Planning Report

Proposed Clonberne Wind Farm and Grid Connection, Co. Galway

DOCUMENT DETAILS

Client:	**Clonberne Windfarm Limited**
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Planning and Environmental Consultants

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1. INTRODUCTION

1.1 Preamble

This Planning Report has been prepared by MKO on behalf of Clonberne Windfarm Limited (the applicant), to accompany a planning application to An Bord Pleanála (the Board) for planning permission for works associated with the proposed Clonberne Renewable Energy Development, located at Clonberne and adjacent townlands, Co. Galway. For ease, as set out in Chapter 1 of the EIAR,

- Where the 'Proposed Project' is referred to, this relates to all the project components described in detail in Chapter 4 of this EIAR i.e., Wind Farm and Grid Connection as detailed in Sections 1.4.1 and 1.4.2 of the 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 of the EIAR.
- Where the 'Proposed Wind Farm' is referred to, this refers to turbines and associated foundations and hard-standing areas, borrow pit, access roads, temporary construction compounds, turbine delivery accommodation works, peatland enhancement area, underground cabling, peat, spoil and overburden management, site drainage, tree felling and all ancillary works and apparatus. The planning application for the Proposed Wind Farm Site is made to An Bord Pleanála in accordance with the provisions of Section 37E of the Planning and Development Act 2000, as amended.
- Where 'Proposed Grid Connection' is referred to, this refers to the onsite substation, and associated underground 220kV cabling connecting into the existing Cashla – Flagford 220kV overhead line at Laughil, subject to a planning application under Section 182A of the Planning and Development Act, 2000, as amended.

The purpose of this Planning Report is to outline the background to the development, the key elements of the proposal and to demonstrate that the Proposed Project complies with all relevant Development Plan provisions and is in accordance with the proper planning and sustainable development of the area.

This report provides a comprehensive assessment of the Proposed Project's consistency with the relevant planning policy framework at national, regional and local levels.

A planning application will be submitted to An Bord Pleanála seeking permission for the proposed 11 No. wind turbines and associated infrastructure with a potential generating capacity of greater than 50 megawatts (MW). The application meets the threshold for wind energy set out in the Seventh Schedule of the Planning and Development Act 2000, as amended (being *'An installation for the harnessing of wind power for energy production (a wind farm) with more than 25 turbines or having a total output greater than 50 megawatts'*) and is therefore being submitted directly to An Bord Pleanála as a Strategic Infrastructure Development (SID) in accordance with Section 37E of the Planning and Development Act, 2000 as amended. This approach has been confirmed following consultations with the Board under the provisions of Section 37B of the Planning and Development Act 2000 as amended (case reference ABP-307058-20).

A second planning application regarding the grid connection infrastructure and associated works will be submitted to An Bord Pleanála in accordance with Section 182A of the Planning and Development Act 2000, as amended. This approach has been confirmed following consultations with the Board under the provisions of, Section 182E of the Planning and Development Acts 2000 as amended (case reference ABP- 314729-22).

The EIAR, along with the Natura Impact Statement (NIS) which accompanies both planning applications will assess the Proposed Project, the Proposed Wind Farm, and the Proposed Grid Connection. Both the EIAR and NIS contain the information necessary for An Bord Pleanála to complete the Appropriate Assessment and Environmental Impact Assessment as required for these planning permission applications.

1.2 Structure of the Report

Section 1 Outlines the preamble and the report structure.

Section 2 Outlines the background of the project, planning history and pre-planning consultations.

Section 3 Provides a description of the Proposed Project.

Section 4 Details the progression of the Proposed Wind Farm design from site selection through to final design.

Section 5 Provides an overview of the relevant national, regional and local planning policy.

Section 6 Provides a planning assessment of the Proposed Project

Section 7 Provides a concluding statement on the Proposed Project contribution to the proper planning and sustainable development of the area.

2. PROJECT BACKGROUND

2.1 The Applicant

The applicant for the Proposed Project is Clonberne Windfarm Limited. Clonberne Windfarm Limited is a subsidiary company of Cregmore Construction Ltd., which is an Irish-owned, Galway-based company owned by Johnny Mullins with extensive experience in the design, construction and operation of wind energy developments throughout Ireland, with projects currently operating in Galway. Cregmore Construction Limited have wide ranging experience in the area of electricity connections to the national grid and electricity substation development and various other utilities projects.

2.2 Site Location and Context

The Site is located within a rural setting in north Galway, approximately 14km north-east of Tuam and approximately 6.5km to the south-east of Dunmore in Co. Galway. Current land-use on the Proposed Wind Farm site comprises a mix of small-scale agriculture with pockets of commercial forestry, low-density residential, public road corridors and cut peat. Current land-use along the Proposed Grid Connection comprises of public road corridor, cut peat, commercial forestry, and agriculture. Land-use in the wider landscape of the Site comprises a mix of agriculture, peat cutting, quarrying, low density residential and commercial forestry.

It is proposed to access the site of the Proposed Project via a newly developed site entrance off the R328 regional road to the north of the site which will act as the main point of entry for construction phase. In addition, an existing access road will be utilised to the west of the site via the L-22321 Local Road for the transport of materials from the proposed borrow pit.

The Site is located within an area designated as **'**Open to Consideration' and 'Acceptable in Principle' for wind energy development in the Galway County Development Plan, 2022-2028.

Figure 2-1 and 2-2 below presents the extent of the Proposed Wind Farm and Proposed Grid Connection Boundary.

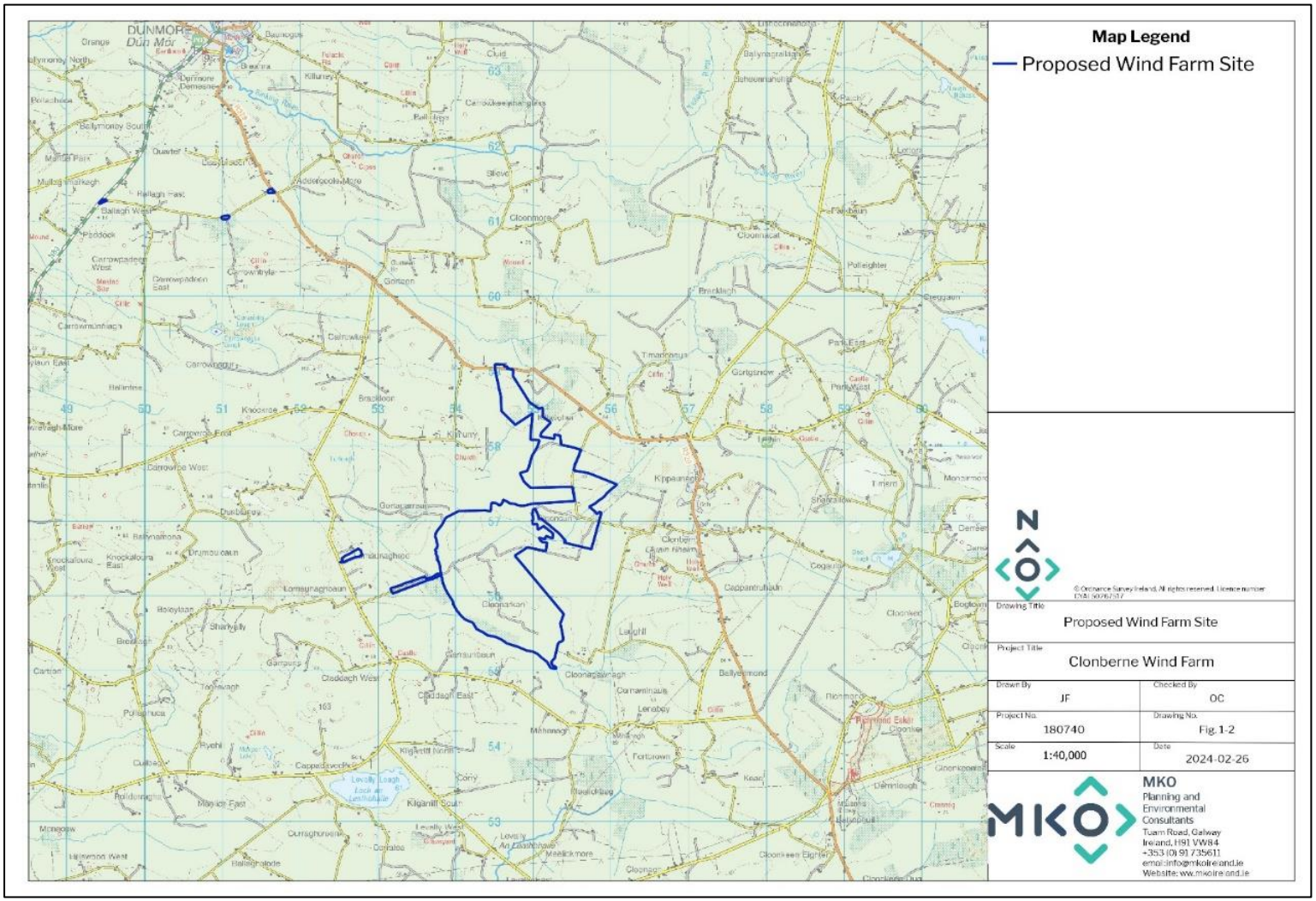

Figure 2-1 Proposed Wind Farm Site

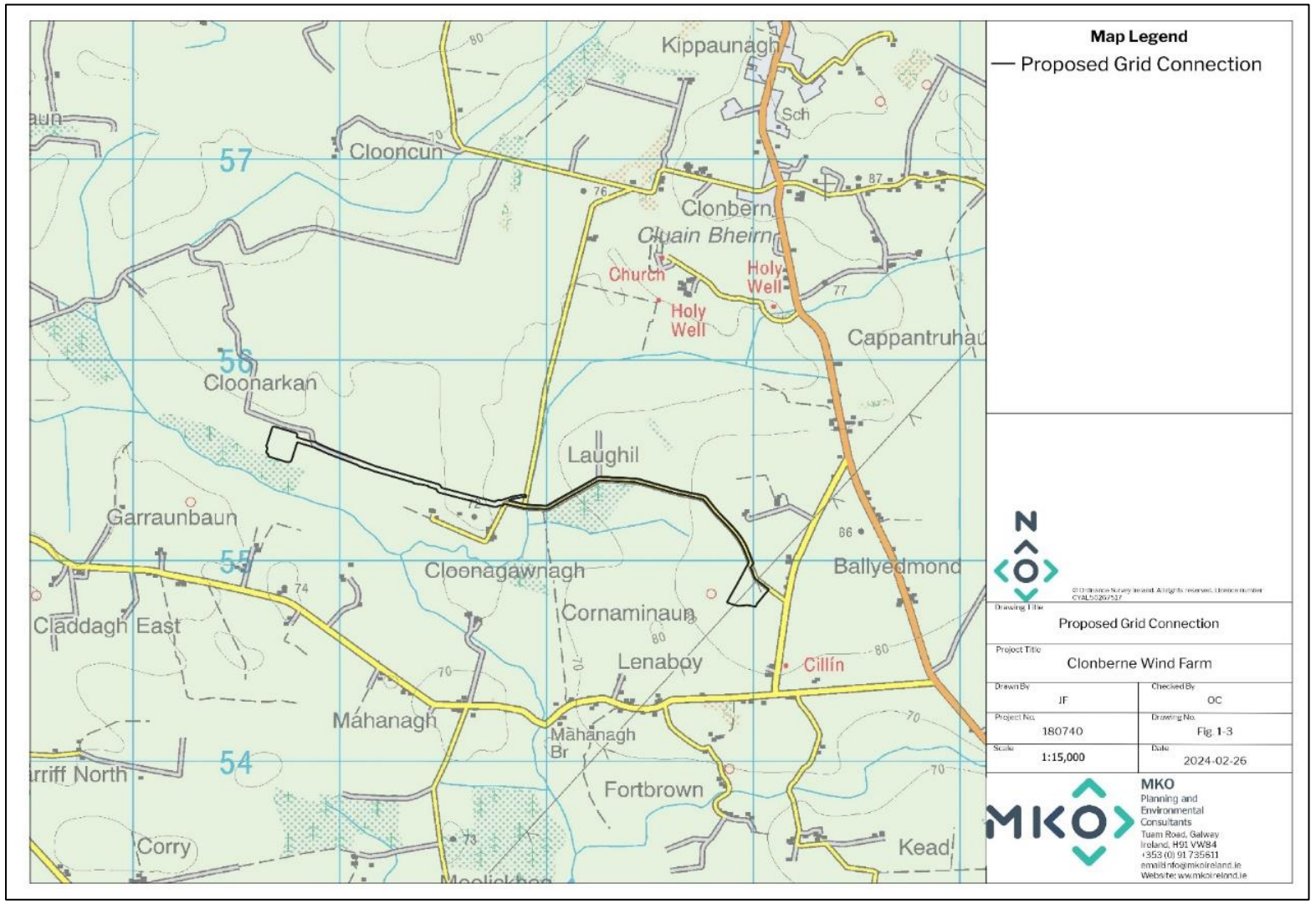

Figure 2-2 Proposed Grid Connection

2.3 Planning History

A planning history search of all planning application within both the Wind Farm and Grid Connection redline boundary was undertaken. A planning history search was carried out through Galway County Council and the Board's planning portals and is set out in **Tables 2-1** and **Table 2-2** below. All applications outside the planning application redline boundary but within the EIAR Site Boundary are set out in **Appendix 2-1** of the EIAR.

Table 2-1 Applications within the Proposed Wind Farm Boundary.

Planning Reference	Development Description	Decision
15/861	Extension of duration: to build a 38kv line from existing Cloon 110kv Station at Cloonascragh, Tuam to a point in the existing 38kv Station at Glenamaddy (previous planning reference no: 10/779)	Granted by GCC 07/09/2015 (Planning Permission Expired 06/09/2020)
19/1827	For the construction of a new forest road bellmouth entrance, for trucks to access forestry plantations and associated site works	Granted by GCC 09/03/2020
20/320	For the renovation of an existing derelict dwelling, the installation of a new treatment plant, secondary treatment filter and percolation area, including all associated site works.	Granted by GCC 08/03/2021
24/60230	for the development consisting of a new 38kV overhead line (OHL) from existing Glenamaddy 38kV station to existing cable ducts approximately 720 metres East of the existing Cloon 110kV station at Cloonascragh. The proposed development involves the construction of 179no. poles (up to 18m in height), 2no. end masts (up to 16.2m in height) and stringing with overhead lines, over a distance of approximately 26.8km, and all associated works including any temporary works required. The project was previously granted under pl. ref. no. 10779 and an extension of this permission was granted under pl. ref. no. 15861. A Natura Impact Statement (NIS) accompanies the application. OSI 2,500 series; 2882, 2883, 2815, 2816, 2748, 2679, 2609, 2610, 2680, 2543, 2544, 2611	Further Information Requested by GCC 26/04/2024.

Table 2-2 Applications within the Proposed Grid Connection Boundary

Planning Reference	Development Description	Decision
15/861	to build a 38kv line from existing Cloon 110kv Station at Cloonascragh, Tuam to a point in the existing 38kv Station at Glenamaddy passing through or in the vicinity of the following townlands: Cloonascragh, Barnacurragh, Shantallow, Toghermore, Ballynakillia, Cahergal, Coolrevagh, Barbersfort, Graddoge, Killmore, Corskeagh Beg, Corskeagh More, Cloonriddia, Lisnaminaun, Lavally West, Corry Kilgarriff North, Mahanagh, Claddagh East, Garraunbaun Cloonarkan, Clonbern, Killavoher, Timadooaun, Cloonmore, Cloonacat, Parkbaun, Lettera,	Granted by GCC 17/09/2015(Planning Permission Expired 06/09/2020)

	Hannagh More(Parkroe), Scotland (Previous Planning reference no: 10/779)	
19/1827	For the construction of a new forest road bellmouth entrance, for trucks to access forestry plantations and associated site works	Granted by GCC 09/03/2020
23/355	To upgrade the existing 220k overhead line between the existing Cashla 220kV Substation in the townland of Barrettspark, Co. Galway, & Tower 138 in the townland of Oughtagh, Co. Galway. The proposed development will consist of refurbishment works to the existing overhead Line (approximately 49 km long & comprising of 138no. steel angle masts). The refurbishment works to towers will consist of: installation of replacement parts on the towers including insulators, shield wire, vibration dampeners, arching horns & anti-climbing guards; associated site development works, including temporary work areas, foundation refurbishment /strengthening & recapping/clearing of shear blocks; clearance of shear block bases; & ancillary works; ancillary site preparation works, site clearance & levelling at the 6no. temporary construction compounds & associated temporary works to existing tracks & new temporary access routes to provide internal access routes to each tower with all associated works required to facilitate the development. No works will be undertaken to the overhead line (conductor). The proposed development will also consist of upgrades to the Cashla 220kV substation that will consist of: the decommissioning and removal of line bay equipment within the substation boundary; construction of a new adjacent offline like for like line bay & associated bay protection cabinets within the substation boundary; & new overhead lines connection between the end mast & the new line bay. A Natura Impact Statement (NIS) will be submitted to the planning authority with the application	Further Information Requested by GCC 19/10/2023
24/60230	For the development consisting of a new 38kV overhead line (OHL) from existing Glenamaddy 38kV station to existing cable ducts approximately 720 metres East of the existing Cloon 110kV station at Cloonascragh. The proposed development involves the construction of 179no. poles (up to 18m in height), 2no. end masts (up to 16.2m in height) and stringing with overhead lines, over a distance of approximately 26.8km, and all associated works including any temporary works required. The project was previously granted under pl. ref. no. 10779 and an extension of this permission was granted under pl. ref. no. 15861. A Natura Impact Statement (NIS) accompanies the application. OSI 2,500 series; 2882, 2883, 2815, 2816, 2748, 2679, 2609, 2610, 2680, 2543, 2544, 2611	Further Information Requested by GCC 26/04/2024

2.4 Pre-Application Engagement

2.4.1 Scoping

A scoping report, providing details of the application site and the Proposed Project, was prepared by MKO and circulated in September 2020. 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. **Appendix 2-2** of the EIAR contains all scoping responses received. The comments of the consultees will be considered in the construction, operation and decommissioning of the Proposed Project in the event of a grant of planning permission. The recommendations of the consultees have informed the scope of the assessments undertaken and the contents of the EIAR.

Please refer to **Section 2.6** of the EIAR for further details.

2.4.2 Pre-Application Meetings

2.4.2.1 Galway County Council

Members of the project team first met with Galway County Council in accordance with Section 247 of the Planning and Development Act 2000 (as amended) (the Act) via MS teams on the on the 19th of November 2020 via MS Teams and included representatives from the Council's Planning, Roads, Environment, Municipal District and Heritage sections. The project team gave a PowerPoint presentation as a high-level overview of the Proposed Project.

A 2nd meeting with representatives from Galway County Council and the project team took place via MS Teams on the 11th December 2023. The project team gave a further overview of the Proposed Project, with particular focus on the Grid Connection, in the form of a PowerPoint presentation.

Please refer to Section 2.7.1.1 of the EIAR for further details.

2.4.3 An Bord Pleanála

2.4.3.1 Section 37B Consultation

The prospective Applicant engaged with An Bord Pleanála (the Board) under the provisions Section 37B (case reference ABP-307058-20) of the Planning and Development Act 2000 (as amended), as to whether the Proposed Project would meet the thresholds of the Seventh Schedule of the Planning and Development Act, 2000, as amended. The prospective applicant opened consultations with the Board in March 2020 with a Proposed Project of 11 no. wind turbines at the Clonberne site. The design team gave an overview of the Proposed Wind Farm in the form of a PowerPoint presentation.

On the 14th October 2020 MKO on behalf of the prospective Applicant sought to close the consultation process with An Bord Pleanála. On the 9th November 2020 An Bord Pleanála the Board wrote to the prospective Applicant and confirmed that the consultation was closed and that the Proposed Wind Farm was considered to be strategic infrastructure within the meaning of Section 37A of the Act and therefore the planning application should be made directly to An Bord Pleanála.

Please refer to **Section 2.7.1.2** of the EIAR for further details.

2.4.3.2 Section 182E Consultation

The prospective Applicant also engaged with An Bord Pleanála under the provisions of Section 182E (case reference ABP- 314729-22) of the Planning and Development Act 2000 (as amended), as to whether

the Grid Connection element of the Proposed Project would be considered SID. A SID meeting under the provisions of Section 182E was held with the Board on the 13th December 2022. The design team gave an overview of the Proposed Grid Connection in the form of a PowerPoint presentation.

A second SID meeting under the provisions of Section 182E was held with the Board on the 11th July 2023. The design team gave an overview of the updated Grid Connection options for the Proposed Project in the form of a PowerPoint presentation. The presentation described both proposed grid connections (110kv connection to substation, or overhead 220kv connection) and it was noted that only one option for grid connection will be applied for planning permission dependent on EirGrids capacity for the connection.

On the 2nd January 2024, the Board wrote to the prospective Applicant and confirmed that the consultation was closed and that the Grid Connection was considered to be strategic infrastructure within the meaning of Section 182E of the Act, and therefore the planning application should be made directly to An Bord Pleanála.

Please refer to **Section 2.7.1.2** of the EIAR for further details.

2.4.1 Community Consultation

The applicant has undertaken extensive consultation with the local community. The project was first introduced to the local community in January 2020, with the delivery of a letter outlining the Applicant's intention to explore the identified area for a wind energy development. The letter was accompanied with a brochure detailing information about the applicant including contact detail and general information on wind energy.

A Public Information Day was held on the 17th November 2022 at Clonberne Community Centre. This event gave those interested in the Proposed Project, an opportunity to discuss the project with experts. Since the initial consultation in January 2020, the applicant and MKO have continued to be available to keep the public informed about the Proposed Project.

The report in **Appendix 2-1** outlines the consultation and community engagement initiatives undertaken by the applicant prior to the submission of the planning application. It also outlines the main issues identified during this process, how the final proposal reflects community consultation and the steps taken to ensure that the Proposed Project will be of enduring economic benefit to the communities concerned.

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

Please refer to **Section 2.7.2** of the EIAR for further details.

3. PROPOSED PROJECT

3.1 Project Description

The proposed Wind farm will comprise of 11 No. turbines with an overall turbine tip height of 180 metres, a hub height of 99 metres and a blade rotor diameter of 162 metres and associated foundations and hard-standing areas, borrow pit, access roads, temporary construction compounds, turbine delivery accommodation works, peatland enhancement area, underground cabling, peat, spoil and overburden management, site drainage, tree felling and all ancillary works and apparatus.

The proposed Grid Connection will comprise of onsite substation, and associated underground 220kV cabling connecting into the existing Cashla – Flagford 220kV overhead line.

A full description of the Proposed Project is available in Chapter 4 of the EIAR.

3.2 Development as Described in Public Notices

An Bord Pleanála – Planning Notice Project Description – Wind Farm Site Application under Section 37E of the Planning and Development Act 2000, as amended

A description of the Proposed Wind Farm as set out in the public planning notices, is as follows:

The proposed development will consist of the provision of the following:

I. *11 no. wind turbines with an overall turbine tip height of 180 metres; a rotor blade diameter of 162 metres; and hub height of 99 metres, and associated foundations, hard-standing and assembly areas;*
II. *Underground electrical cabling (33kV) and communications cabling;*
III. *Provision for the undergrounding of a section of 38kV overhead electrical cabling (as proposed under GCC Ref No. 24/60230), including the provision of 2 no. 38kV Line to Cable Interface End Masts up to a height of 16.2 metres and associated cable ducting to facilitate the undergrounding of the proposed 38kV cabling;*
IV. *Upgrade of existing tracks/roads and provision of new site access roads, junctions and hardstand areas;*
V. *Construction of 1 no. new gated site entrance off the R328 Regional Road to facilitate the delivery of the construction materials and turbine components to site;*
VI. *Construction of 2 no. temporary construction compounds and associated ancillary infrastructure including temporary site offices, staff facilities and car-parking areas for staff and visitors, all to be removed at end of construction phase;*
VII. *Development of 1 no. borrow pit;*
VIII. *Provision of 3 no. passing bays adjacent to the L22321 Local Road and an existing access track to facilitate the transport of stone material to the site;*
IX. *Peat and spoil management including the provision of 4 no. peat repository areas and 1 no. spoil repository area;*
X. *Junction accommodation works including temporary accommodation areas adjacent to the N83 National Secondary Road, R328 Regional Road and L6466 Local Road to facilitate the delivery of turbine components to site;*
XI. *Site Drainage;*
XII. *Peatland Enhancement Area;*

XIII. *Biodiversity Enhancement Measures (including the planting of woodland, linear habitat, grassland management and invasive species removal);*
XIV. *Tree felling and hedgerow removal to facilitate construction and operation of the proposed development;*
XV. *Operational stage site signage; and*
XVI. *All ancillary works and apparatus.*

A thirty five-year operational life from the date of full commissioning of the entire wind farm is being sought and the subsequent decommissioning.

The application is seeking a ten-year planning permission. A concurrent planning application in relation to a proposed substation which will comprise of a 220kV Gas Insulated Switchgear (GIS) building, an Independent Power Producer (IPP) compound, a Battery Energy Storage System (BESS) compound, underground grid connection and associated cabling to connect the proposed Clonberne Wind Farm to the national grid via the existing Flagford to Cashla 220kV overhead line in the townland of Laughil is also being lodged to An Bord Pleanála.

An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) have been prepared in relation to the project and accompany this planning application.

An Bord Pleanála – Planning Notice Project Description – Grid Connection Application under Section 182A of the Planning and Development Act 2000, as amended

The proposed development will consist of the provision of the following:

I. *Construction of a permanent substation which will comprise of a 220kV Gas Insulated Switchgear (GIS) building, an Independent Power Producer (IPP) compound, a Battery Energy Storage System (BESS) compound, including 4 no. 18-metre high Lightning Monopoles, welfare facilities, car parking, wastewater holding tank, 36-metre-high Telecommunications Mast, 2.6-metre high palisade fencing, external lighting, underground cabling, and all associated infrastructure and apparatus;*
II. *All works associated with the connection of the proposed Clonberne Wind Farm to the national electricity grid, including the provision of underground electrical cabling (220kV) to the existing Flagford to Cashla 220kV overhead line, in the townland of Laughil;*
III. *The provision of 2 no. loop-in towers, 2 no. gantries within 2 no. cable compounds to facilitate the connection of the proposed substation to the existing Flagford to Cashla 220kV overhead line;*
IV. *Construction of 2 no. gated permanent site entrances off the L6501 Local Road to facilitate access to the proposed development and the proposed Clonberne Wind Farm;*
V. *Provision of 4 no. joint bays, communication chambers and earth sheath links along the underground electrical cabling route and temporary accommodation areas to facilitate underground cabling works;*
VI. *Provision of a cable access track to facilitate the installation and maintenance of cabling and provide access to the proposed substation;*
VII. *Reinstatement of the road or track surface above the proposed cabling trench along existing roads and tracks;*
VIII. *Operational access road to the proposed development and the proposed Clonberne Wind Farm;*
IX. *Site Drainage;*
X. *Tree felling and hedgerow removal to facilitate construction and operation of the proposed development;*
XI. *Operational stage site signage; and*
XII. *All ancillary works and apparatus.*

The application is seeking a ten-year planning permission. The development subject of this application will facilitate the connection of the proposed 11 no. wind turbine Clonberne Wind Farm to the national electricity grid. A concurrent application in relation to the proposed Clonberne Wind Farm is also being lodged to An Bord Pleanála.

An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) have been prepared in relation to the project and accompany this planning application.

4. PROJECT DESIGN PROCESS

The design of the Proposed Project has been an informed and collaborative process from the outset, involving the project designers, engineers, environmental, ecological, ornithological, hydrological, geotechnical, and traffic consultants and archaeological specialists. The design process has also taken into account recommendations and comments of the relevant statutory and non-statutory organisations, the local community and the local authority where relevant.

The aim of the process being to reduce the potential for environmental effects while designing a commercially viable project capable of being constructed.

Throughout the design process, the layout of the Proposed Wind Farm has been revised and refined to take account of the findings of all desk-based assessments, site surveys/ investigations and baseline assessments which have brought the design from its first initial layout to the current proposed layout.

4.1 Strategic Site Selection

As the cost of building each megawatt of electricity-generating capacity in a wind farm is in the region of €1.5 million, it is critical that the most suitable site for the Subject Development was chosen.

Sites selected for the development of a wind farm must be suitable for consideration under a number of criteria, such as:

- **Planning Policy:** Site location relative to Galway County Development Plan Wind Energy Capacity's classification of areas considered that have capacity for wind farm development from a planning policy perspective;
- **Environmental Sensitivities**: Located outside areas designated for protection of ecological species and habitats;
- **Grid Connection**: Access to the national electricity grid possible within a viable distance;
- **Sensitive Receptors**: Capable of complying with required setbacks from sensitive receptors.
- **Site Scale:** Sufficient area of unconstrained land that could potentially accommodate a wind farm development and turbine spacing requirements;

4.2 Detailed Constraints Mapping

The design and layout of the Proposed Wind Farm follows the recommendations and guidelines set out in the 'Wind Energy Development Guidelines' (Department of the Environment, Heritage and Local Government, 2006) ("the Guidelines") and the 'Best Practice Guidelines for the Irish Wind Energy Industry) (Irish Wind Energy Association, 2012).

The constraints mapping process involves the placing of buffers around different types of constraints to clearly identify the areas within which no development works will take place. The size of the buffer zone for each constraint has been assigned using guidance presented in the Guidelines. Should the 'Draft Revised Wind Energy Guidelines' (Department of Housing, Planning and Local Government, 2019) ("the Draft Guidelines") be adopted in advance of a planning decision being made on this application, the Proposed Wind Farm will be capable of achieving the requirements of the draft Guidelines as currently proposed.

The constraints map for the Proposed Project, was produced following a desk study of all site constraints. **Figure 4-1** encompasses the following constraints and associated buffers:

- Residential dwellings plus a minimum 720-metre buffer (achieving the requirement for a 4x tip height separation distance from properties in line with the new draft Guidelines). There are 3 No. unoccupied dwelling located within 720 metres from any proposed turbine location all belonging to landowners who form part of the Proposed Project.
- Natura 2000 sites plus 200-metre buffer;
- Telecommunication Links plus operator specific buffer;
- Natural Watercourses plus 50-metre buffer;
- Site Specific Flood Modelling for 100-yr and 1000-yr events; and
- Archaeological Sites or Monuments, 50-metre buffer, plus 'Zone of Notification' as required by the National Monuments Service (ROI).

Facilitators at the site build on the existing advantages and include the following:

- Available lands for development;
- Good wind resource;
- Existing access points and general accessibility of all areas of the site due to existing road infrastructure; and
- Limited extent of constraints;
- Supportive Wind Energy policy for the area by Galway County Council.

The inclusion of the constraints on a map of the study area allows for a viable area to be identified. An initial turbine layout is then developed to take account of all the constraints mentioned above and their associated buffer zones and the separation distance required between the turbines. Following the mapping of all known constraints, detailed site investigations were carried out by the project team.

The turbine layout for the Proposed Wind Farm has also been informed by the results of noise, landscape and visual and the separation distance to be maintained between turbines. Thus, the baseline environmental assessment of the site and wind farm design was an iterative process, where findings at each stage of the assessment were used to further refine the design, always with the intention of minimising the potential for environmental impacts

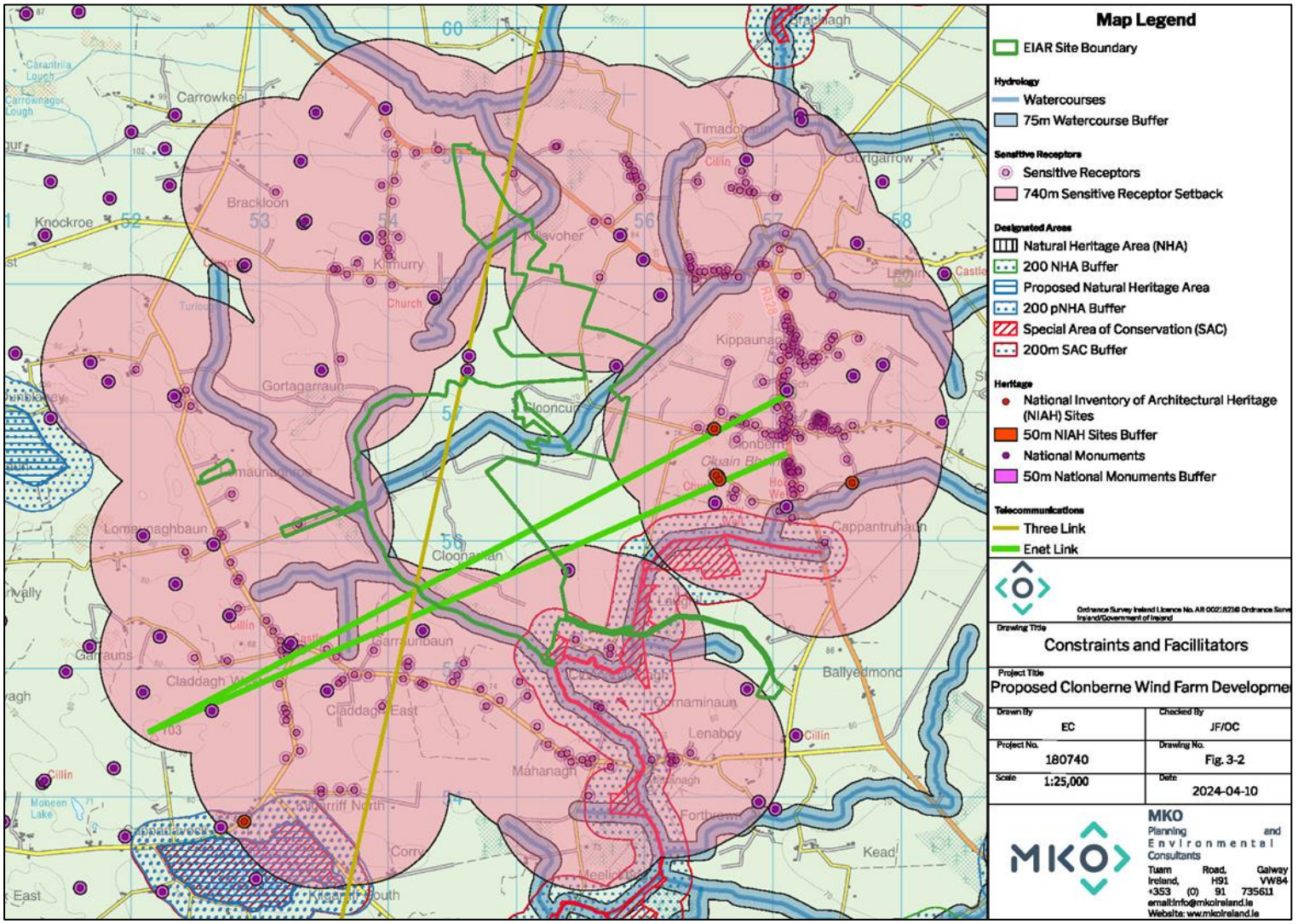

Figure 4-1 Constraints and facilitators Map

4.3 Turbine Layout Design Process

The Proposed Wind Farm has undergone a comprehensive design process, commencing with the identification of constraints through desk-based analysis and initial site surveys. The initial turbine layout consisted of 18 no. turbines within a larger viable area. As subsequent site surveys and further analyses were conducted, adjustments were made to the design following feedback from the project team, landowners, neighbours, and the need to ensure sufficient separation distances are maintained for on-site constraints. The Proposed Project underwent 6 separate iterations in total before culminating in the final design, as shown in **Figure 4-2** below. This final design is regarded as optimal as identified constraints are avoided while also maximising the site's development potential.

Further details of the design process and a selection of design iterations can be found in **Chapter 3** of the EIAR.

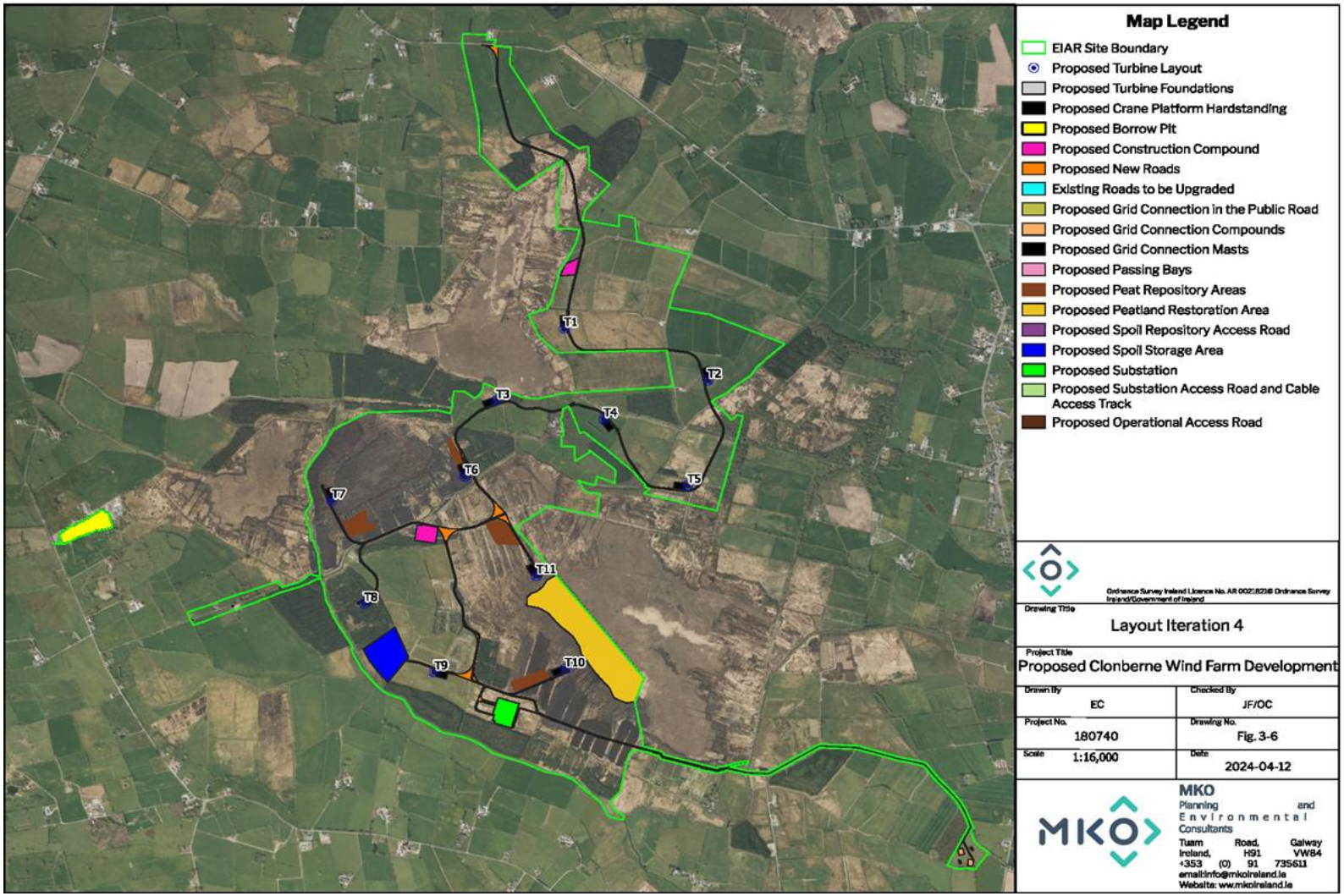

Figure 4-2 Final Proposed Project Layout

5. PLANNING POLICY APPRAISAL

This section of the planning report provides an overview of the relevant planning policies that applies to the Proposed Wind Farm and sets out an appraisal of the Proposed Project against the relevant planning policy context.

As is detailed in the following sections, the policy context that applies to the Proposed Project is characterised by a number of crises that have taken centre stage recently and have been the main drivers behind a large portion of the policy development that have taken place in the last number of years.

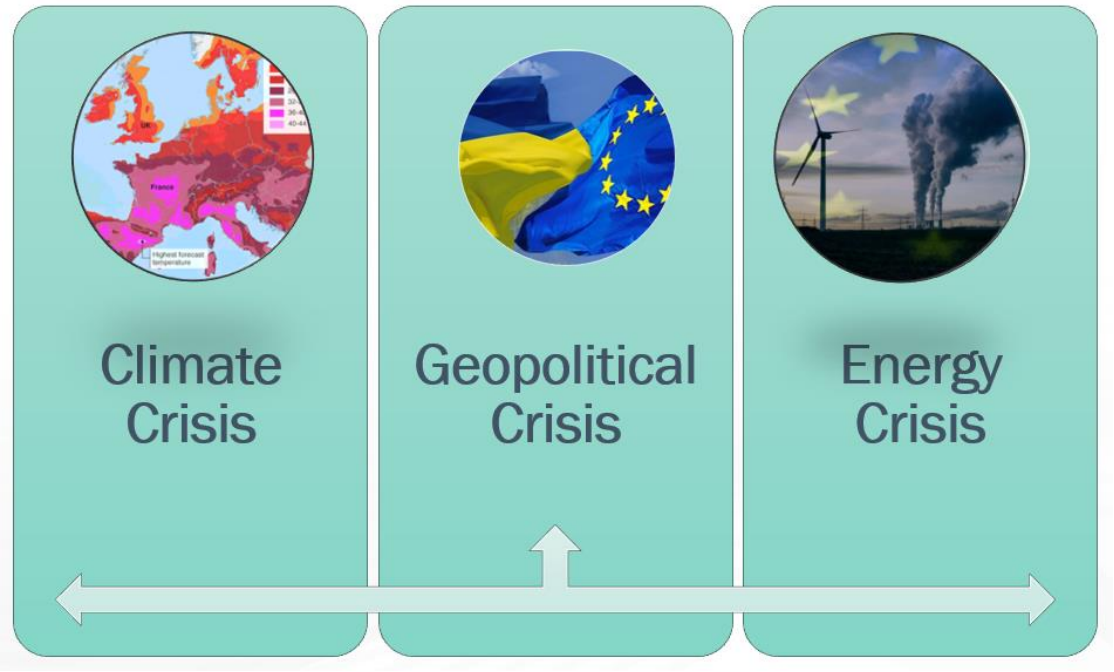

Figure 5-1 A series of Crises

Climate and renewable energy policy at a European and national level is changing at an unprecedented pace to deal with the challenges arising from the climate and energy crisis. The Climate Action Plan 2023 (CAP 23) increased the 2030 onshore wind energy target from 8GW, set out in the CAP 21, to 9GW. This target has been incorporated unchanged into the Climate Action Plan 2024. At the European level, the latest revision of the Renewable Energy Directive (EU/2023/2413) entered into force on the 20th of November 2023. The revised directive sets an overall renewable energy target of at least 42.5% at EU level by 2030 but aims for the achievement of 45%.

The Proposed Project is considered to be supported by, and consistent with all levels of policy from international to the local level. Both the RePowerEU and European Green Deal have overarching targets of achieving energy security, emissions reductions and the transition to a low carbon economy. The Proposed Project will aid in this regard as it has the potential to produce a significant amount of indigenous renewable energy. It is also in line with objectives of a reduction of carbon emissions at the local level which will have a positive impact on the EU's and the State's overall emission reduction targets. A European, national and regional policy compliance table is provided below.

5.1 International Policy Context

REPowerEU

Published in response to Russia's invasion of Ukraine, REPowerEU aims to accelerate the energy transition and increase Europe's energy independence. The European Commission proposed the RePowerEU plan to make Europe independent from Russian fossil fuels including oil and gas, due to the high and volatile energy prices, and security of supply concerns following Russia's unprecedented military attack on Ukraine.

A key pillar of REPowerEU includes reducing faster the use of fossil fuels by boosting energy efficiency, **increasing renewables** and addressing infrastructure bottlenecks.

> *"There is a double urgency to reduce Europe's energy dependence: the climate crisis, compounded by Russia's aggression and EU's dependence on fossil fuels, which Russia uses as an economic and political weapon.*
>
> *The green transformation of Europe's energy system will strengthen economic growth, reinforce its industrial leadership, and put Europe on a path towards climate neutrality by 2050.*
>
> *The European Commission calls on leaders, Member States, regional and local authorities, and indeed every citizen and business, to reduce Europe's energy dependence from Russia through the implementation of [the] REPowerEU plan"*

The key aims and objectives of REPowerEU can be summarised as follows:

- Accelerate the roll-out of renewables.
- Increase the 2030 target for renewables from 40%-45%.
- Tackle slow and complex permitting for major renewable projects.

REPowerEU places renewable energy in the '**overriding public interest**' acknowledging the urgency required to accelerate the roll out of renewables.

In recognition of the worsening energy crises arising from Russia's war against Ukraine, the Council of the European Union adopted Regulation (EU) 2022/2577 on 22 December 2022, '*Laying down a framework to accelerate the deployment of renewable energy*.' This regulation, which has immediate and direct effect in Member States, applies to "*all permit-granting processes that have a starting date within the period of its application*" and includes a number of tangible measures aimed at streamlining the permit-granting process and facilitating the accelerated deployment of renewable energy. The period of application of the Regulation is the 30 December 2022 to 30 June 2025 and therefore applies to the present applications and EIA.

> *'A fast deployment of renewable energy sources can help to mitigate the effects of the current energy crisis, by forming a defence against Russia's actions. Renewable energy can significantly contribute to counter Russia's weaponisation of energy by strengthening the Union's security of supply, reducing volatility in the market and lowering energy prices.'*[1]

Central to the regulation is the presumption that renewable energy development must be considered to be in the overriding public interest when addressing competing interests under the Habitats Directive (92/43/EEC), Birds Directive (2009/147/EEC) and the Water Framework Directive (2006/60/EC) and that renewable energy projects should be given priority when balancing legal interests in a given case – Article 3:

[1] *Council Regulation (EU) 2022/2577, at Recital 1*

1) *'The planning, construction and operation of plants and installations for the production of energy from renewable sources, and their connection to the grid, the related grid itself and storage assets shall be presumed as being in the overriding public interest and serving public health and safety when balancing legal interests in the individual case, for the purposes of Article 6(4) and Article 16(1)(c) of Council Directive 92/43/EEC, Article 4(7) of Directive 2000/60/EC of the European Parliament and of the Council and Article 9(1)(a) of Directive 2009/147/EC of the European Parliament and of the Council....'*

2) *'Member States shall ensure, at least for projects which are recognised as being of overriding public interest, that in the planning and permit-granting process, the construction and operation of plants and installations for the production of energy from renewable sources and the related grid infrastructure development are given priority when balancing legal interests in the individual case....* (emphasis added)'

The Regulation was introduced as a temporary, emergency measure and included provision for the EU Commission to review the application of, and continued need for, the measures included in the Regulation. The Commission completed its review of the Regulation and furnished its report to the Council on the 28 November 2023. In its report the Commission recommended the prolongation of the validity of certain measures in the Regulation, including Article 3(2), and by Regulation 2024/223 of the 22 December 2023 the Council of the European Union, Regulation 2022/2577 was extended and amended, with Article 3 applying to the all permit-granting processes commenced up to the 30 June 2025.

The importance, continued need and effectiveness of Article 3(2) of Regulation 2022/2577 in aiding the accelerated deployment of renewable energy is explained in Recital 14 of Regulation 2024/223:

> *'...Article 3(2) of Regulation (EU) 2022/2577 requires priority to be given to projects that are recognised as being of overriding public interest whenever the balancing of legal interests is required in individual cases and where those projects introduce additional compensation requirements for species protection... The first sentence of Article 3(2) of Regulation (EU) 2022/2577 has the potential, in the current urgent and still unstable energy situation on the energy market which the Union is facing, to further accelerate renewable energy projects since it requires Member States to promote those renewable energy projects by giving them priority when dealing with different conflicting interests beyond environmental matters in the context of Member States' planning and the permit-granting process. The Commission's report demonstrated the value of the first sentence of Article 3(2) of Regulation (EU) 2022/2577 which recognises the relative importance of renewable energy deployment in the current difficult energy context beyond the specific objectives of the derogations foreseen in the Directives referred to in Article 3(1) of Regulation (EU) 2022/2577. Given the particularly severe situation in the supply of energy which the Union is currently facing, it is appropriate to prolong the application of Article 3(2) of Regulation (EU) 2022/2577 in order to appropriately recognise the crucial role played by renewable energy plants to fight climate change and pollution, reduce energy prices, decrease the Union's dependence on fossil fuels and to ensure the Union's security of supply in the context of the balancing of legal interests carried out by permit-granting authorities or national courts. At the same time, it is also appropriate to keep the environmental safeguard that, for projects recognised as being of overriding public interest, appropriate species conservation measures, underpinned by sufficient financial resources, are adopted.* (emphasis added)'

It is clear from the urgency conveyed by the REPowerEU plan and the provisions set out in the Regulation (2022/2577) that the accelerated deployment of renewable energy is crucial mitigate the impact of the energy crisis, eliminate the European Union's dependency on imported Russian gas and provide energy security to Member States.

The Proposed Project is directly supported through the REPowerEU framework. In this regard, the Proposed Project should be considered in the overriding public interest.

Renewable Energy Directive

The renewable energy directive is the legal framework for the development of renewable energy across all sectors of the EU economy, supporting clean energy cooperation across EU countries. Since the introduction of the Renewable Energy Directive (RED) in 2009, the RED has undergone several revisions, all pushing the renewable energy targets upwards, to combat increasing emissions. Since its adoption in 2009, the share of renewable energy sources in energy consumption has increased from 12.5% in 2010 to 23% in 2022[2]. Of the 27 EU member states the lowest proportions of renewables were recorded in Ireland (13.1%). Crucially, the Renewable Energy Directive sets the overall target for renewable energy in the EU.

RED I - 2009

Renewable Energy Directive 2009 (RED I - the original RED) (2009/28/EC), adopted in 2009, set binding targets for EU member states to achieve a 20% share of renewable energy in final energy consumption by 2020. It established a framework for national renewable energy action plans, sustainability criteria for biofuels and bioliquids, and a system of guarantees of origin for renewable energy.

RED II - 2018

RED II, the first major amendment to the RED, (2018/2001/EU) entered into force in December 2018, as part of the Clean Energy for all Europeans package. In RED II, the overall EU target for Renewable Energy Sources consumption by 2030 was raised to 32%.

RED III – 2023

In November 2023, a revision of the Renewable Energy Directive[3] (RED III), came into force. RED III increases the EU wide renewable energy target from 32% set under the previous revision of the directive to at least 42.5%, with an ambition to reach 45% by 2030. The increase was proposed under the publication of REPowerEU plan in May 2022. The Directive also introduces specific targets for Member States in the industry, transport, and building (district heating and cooling) sectors.

Under RED III, EU member states must identify areas for the acceleration of renewables where projects will undergo a simplified and fast-track procedure. The deployment of renewables will also be of "overriding public interest" in order to limit the number of legal challenges on new renewable energy installations. These measures came in response to REPowerEU which found that permitting is the biggest bottleneck for deploying wind at scale, with approximately 80 GW of wind power capacity stuck in permitting procedures across Europe.

[2] *https://ec.europa.eu/eurostat/en/web/products-eurostat-news/w/ddn-20231222-2*
[3] *Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (recast)*

5.2 National Policy Context

The Climate and Low Carbon Development Act 2015 (as amended)

The Climate Action and Low Carbon Development 2015 (as amended) ("the Climate Act") establishes a legislative precedent to reduce Ireland's carbon emissions. The Climate Act 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 Climate Act also 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.

When exercising its decision-making powers under the Planning Act, the Planning Authority, and the Board is obliged to perform its decision-making function (in so far as practicable) in a manner consistent with:

- the most recent approved climate action plan,
- the most recent approved national long term climate action strategy,
- the most recent approved national adaptation framework and approved sectoral adaptation plans,
- the furtherance of the national climate objective, and
- the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.

Specifically, Section 15(1) of the Climate Act provides that:

> *"A relevant body shall, in so far as practicable, perform its functions in a manner consistent with—*
>
> *a) the most recent approved climate action plan,*
> *b) the most recent approved national long term climate action strategy,*
> *c) the most recent approved national adaptation framework and approved sectoral adaptation plans,*
> *d) the furtherance of the national climate objective, and*
> *e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State." (the "National Climate Policies and Objectives")*

The above requirement is a mandatory obligation. The National Climate Policies and Objectives all support the development, and by implication the consenting, subject to proper planning, of wind farm developments.

Climate Action Plan 2023

The Climate Action Plan 2023 (CAP23) launched in December 2022, sets out an updated 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 introduction of the Climate Action and Low Carbon Development (Amendment) Act 2021. The Climate 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.

The CAP23 further emphasised the continued role of onshore wind in addressing the decarbonisation of the electricity sector. Under the CAP23 **onshore wind targets are again increased with a target 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 CAP23. 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.

As set out in this section the renewable energy targets for the State have increased steadily with each new CAP, with the target of 70% renewable electricity by 2030 set out in CAP19 increasing to 80% in CAP21 and the target of 8GW of onshore wind by 2030 set out in CAP 19/21 increasing to 9GW in CAP23.

The Proposed Project will contribute directly towards the CAP23 goals of 9GW of wind energy and 80% renewable electricity by 2030. Onshore wind is identified as being critical in the decarbonisation of the electricity sector and as such the Proposed Wind Farm should be considered in that regard.

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 includes an annex of actions to achieve the renewable energy targets. The actions aim to accelerate the delivery of renewable electricity. The actions focus on revising and updating policy documents to establish a policy framework capable of delivering the quantum of renewable electricity required. The most relevant actions and their associated timelines are set out below:

- EL/24/1: Accelerating Renewable Electricity Taskforce to publish programme of work – Q2 2024
- EL/24/3: Revision to the National Planning Framework to include regional capacities for the allocation of national targets at a regional level in order to inform local development plan policy - Q2 2024
- EL/24/4: Publish Regional Renewable Electricity Strategies – Q4 2024
- EL/24/5: Publish Revised Wind Energy Development Guidelines for onshore wind - Q4 2024

- EL/24/6: Publish revised methodology for Local Authority Renewable Energy Strategies – Q2 2024

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 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 identifies the alignment of local and national policy as critical to accelerate renewable energy rollout.

> *"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".*

The National Planning Framework

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.

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.

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.

The following National Policy Objectives (NPO) are applicable to the Proposed Project.

- **NPO 21:** Enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through the diversification of the rural economy into new sectors and services, including ICT-based industries and those addressing climate change and sustainability.
- **NPO 54:** Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.
- **NPO 55:** Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050.

Relevant to the Proposed Project, National Strategic Outcome 8 is as follows:

National Strategic Outcome 8: *Transition to a low carbon and climate resilient economy*

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 acknowledges that:

> "*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".*

It is clear that the provision of new renewable energy developments is in line with the aims and objectives of the NPF which seeks to transition to a low carbon and climate resilient economy. If permitted, the Proposed Project will contribute to the achievement of NPO 21, 54, and 55, by stimulating economic development and by providing clean, renewable energy allowing for a reduced carbon footprint.

National Development Plan 2021-2030

Prepared by the Department of Public Expenditure and Reform, the National Development Plan 2021 – 2030 (NDP) was published on 4th October 2021 and sets out the major public investment projects identified by Government which are to play a significant role in addressing the opportunities and challenges faced by Ireland over the coming years such as housing, health, population growth, and most relevant to the subject development, climate change. It is stated that the NDP 2021 – 2030 will be the 'largest and greenest ever delivered in Ireland', and in this regard, the NDP highlights that extensive consultation was undertaken to ensure that the plan adequately supports the implementation of climate action measures. Reflecting on the recent publication of the IPCC's 6th Assessment Report, the NDP notes that the Irish Government is fully committed to 'playing its part' to ensure that the worst climate change damage can be avoided, e.g. significant reductions in CO2 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 is certainly an ambitious and an explicit driver for the deployment of new renewable generators such as the Proposed Wind Farm. The focus of investment in renewable energy infrastructure is to contribute to a long-term, sustainable and competitive energy future for Ireland.

The NDP is clear in its priority to reach a low-carbon, climate resilient society over the lifetime of the plan.

The Proposed Project will provide clean, renewable electricity to the national grid, furthering development objectives of the NDP.

The National Energy & Climate Plan 2021 – 2030

Published by the Department of Communications, Climate Action and Environment in 2021, the National Energy & Climate Plan (NECP) was produced in accordance with EU Regulation 2018/1999 on the Governance of the Energy Union and Climate Action. The NECP identifies 5 'dimensions' which form the basis of the policies and measures outlined in the plan. These dimensions have associated key objectives to be achieved over the NECPs lifetime. Most relevant to the Proposed Wind Farm are the dimensions relating to decarbonisation and energy security, the key objectives are outlined below.

- Ireland has established an objective of achieving a 34% share of renewable energy in energy consumption by 2030 *(since raised to 50%).*
- Increase electricity generated from renewable sources to 70% *(since raised to 80%).*
- Onshore wind capacity of up to 8.2 GW *(since raised to 9GW).*
- Ireland is committed to maintaining the security of our energy system in the most cost-effective manner.

The Proposed Project will progress the key objectives of the NECP, particularly the dimensions relating to decarbonisation and energy security, by adding a new renewable electricity generator to the national grid.

National Energy Security Framework

The National Energy Security Framework (NESF), published by Department of the Environment, Climate and Communications in April 2022, clearly highlights 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 (REPowerEU) has brought to the fore the importance of security of supply and how energy policy is designed for long-term resilience. The NESF sets out the responses identified to ensure the security of our energy supply in the near term. It also 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.

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.

There is now a *"double urgency to reduce Europe's energy dependence: the climate crisis, compounded by Russia's aggression and EU's dependence on fossil fuels".* Considering the urgency to increase indigenous renewable energy generation to safeguard our energy supply, it is imperative that the suitable sites, such as the site of the Proposed Project, are developed as soon as possible to achieve the ambitions of the NESF.

Energy Security in Ireland to 2030 – Energy Security Package

Published in November 2023, the energy security package titled 'Energy Security in Ireland to 2030' builds on the policies set out in the NESF. The energy security package is based on the recognition of the following fact:

> *"Ireland's future energy will be secure by moving from an oil-, peat-, coal- and gas-based energy system to an electricity-led system maximising our renewable energy potential, flexibility and being integrated into Europe's energy systems."*

The energy security package includes a range of measures to implement this approach by the prioritisation of the following:

1. Reduced and Responsive Demand.
2. Renewables-Led System.
3. More Resilient Systems.
4. Robust Risk Governance.

Independent research undertaken as part of the package, the McCarthy Report, provides an analysis of developments in the electricity sector in Ireland. The McCarthy Report makes the following observation in relation to the consenting process:

> *"The problem of delays encountered by major infrastructure projects, including in the electricity system, due to planning and environmental consent issues was evident. They had been commented upon by the International Energy Agency in its 2019 review of Ireland which named planning delays as the principal challenge to delivery of policy for the sector."*

A key finding from the technical analysis conducted as part of the energy security package is the interdependence of energy security on two essential pillars: *'harnessing our indigenous renewable energy resources at speed and at scale and the rapid electrification of energy demand'*. As such, the energy security package provides additional measures to supplement the existing measures introduced under previously published government policy documents. Those additional measures most relevant to the Proposed Wind Farm are as follows:

> *"Action 10: To implement Planning and Consenting System Reforms and provide greater certainty to the sector."*

The energy security package aims to ensure that the planning system is fully aligned and resourced to fully support accelerated renewable energy development. It also aims to ensure renewable energy projects are prioritised in line with the recast Renewable Energy Directive and RePowerEU.

The Proposed Project is set to significantly support the government's objectives in ensuring the State's energy security and serves as a domestic renewable energy generator capable of providing clean electricity to the national electricity grid, contributing to a renewables-led system.

Wind Energy Guidelines

In June 2006, the then Department of Environment, Heritage, and Local Government (DoEHLG) published '*Wind Energy Development Guidelines for Planning Authorities'* (the Guidelines) The aim of the 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.

The Proposed Wind Farm adheres to the Guidelines in its design and preparation. In this regard this EIAR considers all relevant potential environmental impacts that could arise (Chapter 5 of the 2006

Guidelines), and the design of the Proposed Wind Farm has followed the design principles established in Chapter 6 of the 2006 Guidelines.

The Department of Housing, Planning and Local Government published the '*Draft Wind Energy Development Guidelines*' in December 2019 (the draft Guidelines). and they remain in draft at the time of writing.

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, 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 and spacing;
- Control of shadow flicker;
- Compliance with Community consultation and dividend requirements, as included within the obligatory Community Report; and
- Consideration of the siting, route and design of the proposed grid connection as part of the whole project.

The design of the Proposed Wind Farm has been designed in accordance with the Guidelines and has also 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 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 the time of writing, the draft Guidelines have not yet been adopted, and the relevant guidelines for the purposes of section 28 of the Act as amended, remain those issued in 2006. Notwithstanding this, however, due to the timelines associated with the planning process for renewable energy projects and the commitment within the Climate Action Plan 2024 to publish the draft Guidelines by Q4 2024, it is possible that the new guidelines are adopted during the consideration period for the Proposed Wind Farm.

Towards this end it is anticipated that the Proposed Wind Farm will be capable of adhering to the relevant standards through the implantation of wind turbine control measures, albeit without sight of the final, adopted guidelines the processes by which the Proposed Wind Farm will comply with the same cannot be confirmed at this stage. It is noted that the Proposed Wind Farm layout achieves the required setback distance from Sensitive receptors (four times the proposed tip height) set out in the draft Guidelines for visual amenity purposes, and noise and shadow flicker levels are controllable by management of the turbine operation as required.

5.3 Regional Policy Context

The Northern and Western Regional Assembly (NWRA) has a recognised leadership role in setting out regional policies and coordinating initiatives which support the delivery and implementation of the National Planning Framework. The primary vehicle for this is the preparation and implementation of the Regional Spatial and Economic Strategy.

The North and Western region is characterised by the RSES as having '*a unique natural endowment of ample carbon-neutral, energy supplies*' such as wind. Specifically, the Western Region is stated as being *'particularly rich'* in renewable energy resources dispersed across the region. The RSES acknowledges that the region has a pivotal role in delivering a successful transition to Ireland's proposed low carbon economy with huge potential for growth in renewables. As such, there is '*still significant potential*' for all new renewable energy outputs to the grid. In order to facilitate the growth of renewables within the region, the RSES notes that the NWRA aims to encourage stakeholders, i.e. industry, commercial etc., to be the first to facilitate new opportunities and concentrate on possibilities to further advance renewable energy generation and use.

These strategic aims are captured in Policy Objectives 4.16, 4.17 and 4.18:

- ***RPO 4.16****: The NWRA shall co-ordinate the identification of potential renewable energy sites of scale in collaboration with Local Authorities and other stakeholders within 3 years of the adoption of the RSES. The identification of such sites (which may extend to include energy storage solutions) will be based on numerous site selection criteria including environmental matters, and potential grid connections.*

- ***RPO 4.17****: To position the region to avail of the emerging global market in renewable energy by stimulating the development and deployment of the most advantageous renewable energy systems, including:*
  - *Stimulating the development and deployment of the most advantageous renewable energy systems;*
  - *Raising awareness and public understanding of renewable energy and encourage market opportunities for the renewable energy industry to promote the development and growth of renewable energy businesses; and*
  - *Encourage the development of the transmission and distribution grids to facilitate the development of renewable energy projects and the effective utilisation of the energy generated from renewable sources having regard to the future potential of the region over the lifetime of the Strategy and beyond.*

- ***RPO 4.18****: Support the development of secure, reliable and safe supplies of renewable energy, to maximise their value, maintain the inward investment, support indigenous industry and create jobs.*

The Regional Policy Objectives above reflect the strong support for renewable energy throughout the RSES. The Proposed Project will generate renewable electricity contributing to the achievement of these objectives. The Proposed Project is therefore in alignment with and strongly supported by the policies of the RSES.

Table 5-1 EU, National & Regional Objectives and Compliance Summary Table

Policy / Legislative Document	Targets / Objectives	Compliance
REPowerEU	• Accelerate the roll-out of renewables. • Increase the 2030 target for renewables from 40%-45%. • Tackle slow and complex permitting for major renewable projects	Considering the urgency required under the REPowerEU, it is imperative that all suitable sites, such as the site of the Proposed Wind Farm, are developed as soon as possible, in accordance with proper planning and sustainable development.
Renewable Energy Directive	42.5% renewable energy by 2030, aiming for 45%.	The Proposed Project will increase Ireland's renewable energy share, contributing towards Ireland's climate and energy obligations under EU law.
Climate Action and Low Carbon Development Act 2015(Amended)	A 51% reduction in emissions by 2030. Net-zero emissions by 2050. Under Section 15, public bodies are required to, in so far as practical, perform its functions in a manner consistent with the Climate Action Plan 2024, the National Energy & Climate Plan 2021 – 2030 and other national climate mitigation and adaptation plans.	The Proposed Project will contribute towards the legally binding emissions reductions targets for 2030 and 2050.
Climate Action Plan 2024	9GW of onshore wind by 2030, 6GW by 2025.	The Proposed Project will contribute directly towards the CAP24 goals of 9GW of wind energy by 2030. Onshore wind is identified as being critical in the decarbonisation of the electricity and as such the Proposed Wind Farm should be considered in that regard.
Project Ireland 2040: The National Planning Framework	National Strategic Outcome 8: Transition to a low carbon and climate resilient economy.	The Proposed Project is in line with the objectives of the NPF which seeks to transition to a low carbon and climate resilient economy. If permitted, the Proposed Wind Farm will contribute to the achievement of National Policy Objectives 8, 21, 54, and 55.
National Development Plan 2021 - 2030	National Strategic Outcomes 8: Transition to a Climate-Neutral and Climate Resilient Society	The NDP is clear in its priority to reach a low-carbon, climate resilient society over the lifetime of the plan. The Proposed Project, if permitted, will provide clean, renewable electricity to the national grid, furthering development objectives of the NDP.
National Energy Security Framework	• Ensuring security of energy supply in the near-term; • Reducing our dependency on imported fossil fuels in the context of the phasing out of Russian energy imports across the EU.	The Proposed Project will reduce the need for imported fossil fuels for electricity, improving national energy security.

The National Energy & Climate Plan 2021 – 2030	• Decarbonisation - Renewable energy • Energy security	The Proposed Project will contribute to achieving key decarbonisation and energy security objectives by adding a new renewable electricity generator to the national grid.
Energy Security in Ireland to 2030 – Energy Security Package	• Reduced and Responsive Demand. • Renewables-Led System. • More Resilient Systems. • Robust Risk Governance.	The Proposed Project supports the objectives to ensure the State's energy security. This Proposed Wind Farm serves as a domestic renewable energy generator capable of providing clean electricity to the national electricity grid.
Wind Energy Guidelines	• Acceptable noise thresholds and monitoring frameworks • Visual amenity setback and spacing • Control of shadow flicker • Compliance with Community consultation and dividend requirements • Consideration of the siting, route and design of the proposed grid connection as part of the whole project.	The Proposed Wind Farm complies with the requirements set out by the Guidelines, including noise, set back, shadow flicker, and community consultation guidelines. It is anticipated that the Proposed Wind Farm will be capable of adhering to the draft Guidelines when finalised.
Regional Economic and Spatial Strategy	**RPO 87 Low Carbon Energy Future:** The RSES is committed to the implementation of the Government's policy under Ireland's Transition to a Low Carbon Energy Future 2015-30 and Climate Action Plan 2019. It is an objective to promote change across business, public and residential sectors to achieve reduced GHG emissions in accordance with current and future national targets, improve energy efficiency and increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport and agriculture. **RPO 99 Renewable Wind Energy:** It is an objective to support the sustainable development of renewable wind energy (on shore and offshore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.	The Proposed Project is in compliance with the Regional Economic and Spatial Strategy which supports the development of renewable energy in the region.

5.4 Local Policy Context

5.4.1 Galway County Development Plan 2022-2028

5.4.1.1 Wind Farm Site

The Galway County Development Plan 2022-2028 (the GCDP) was adopted by the Elected Members of Galway County Council at the Special Metting held on the 9th of May 2022 and came into effect 6 weeks later on the 20th of June 2022.

The GCDP incorporates the aims, objectives, policies and guidelines to provide for the proper planning and sustainable development of County Galway. The CDP outlines the commitment to the development of the county's renewable energy supply and acknowledges the importance of renewable energy in reducing anthropogenic greenhouse gas emissions and the contribution of renewable energy in achieving national and EU targets. Chapter 14 of the CDP states:

> *"Climate action responsibilities have been outlined for every chapter in the plan. Therefore, the responsibilities of climate action must be adhered to in a multi-faceted manner by all sectors and the development plan policy objectives have been thoroughly climate proofed to secure sufficient contribution to the climate action agenda."*

The GCDP further recognises that an efficient and secure energy supply is essential to the future growth and sustainable development of County Galway through the vision set out in Chapter 14 Climate Change, Energy and Renewable Resource:

> *"To reduce the carbon footprint by integrating climate action into the planning system in support of national targets, support indigenous renewable sources in order to reduce dependence on fossil fuels and improve security of supply and the move to a competitive low carbon economy."*

The policies and objectives set out within the GCDP are supportive of the development of renewable energy within the county. Climate change is emphasised as one of the greatest global challenges with Galway County Council acknowledging that continual action is needed for Galway to become a low carbon and climate resilient county.

Table 5-2 Galway County Development Plan 2022-2028 - Energy Expectations

Energy Expectation	Proposed Project Compliance
"A reduction in demand for non-renewable energy sources, such as coal and oil, as well as an increased demand for electricity from all sectors, leading to more sustainable energy usage across the county."	The Proposed Project will generate clean, renewable electricity, which can be integrated into the grid to meet the increasing demand for electricity across various sectors. By supplying sustainable renewable energy, the Proposed Project will reduce the need for non-renewable sources like coal and oil, helping to transition toward cleaner energy usage in the county.
"A significant increase in the demand for electricity is predicted resulting in a decrease in utilisation of fossil fuels. A large factor in this will be the Transport sector, as electric vehicles are developed and become more widespread, the oil usage by the sector is projected to decrease."	Wind-generated electricity can power electric vehicles (EVs). As wind farms contribute to the grid's capacity, the increase in clean energy availability can support the growth of EVs. This transition from traditional gasoline and diesel vehicles to EVs leads to a decrease in oil usage,

	especially in the transport sector, and can be supported by renewable electricity generation.
"A significant reduction in the use of coal and peat for home heating is anticipated due to advances in home heating technology, improvements in home insulation and new laws restricting the burning of fossil fuels for home heating due to environmental and climate change obligations."	Projects such as the Proposed Project are a critical component in decoupling the county from reliance on fossil fuels. By generating renewable energy, wind farms contribute to achieving the long-term goal of replacing fossil fuels with sustainable energy sources. This aligns with the Strategy for Renewable Energy 2012 - 2020, emphasizing a transition away from traditional non-renewable fuels in the energy sector.
"In the longer-term fossil fuels will be replaced by renewable energy sources in County Galway in line with the Strategy for Renewable Energy 2012 – 2020 which is aimed at decoupling energy from reliance on fossil fuels."	

5.4.1.2 Galway County Local Authority Renewable Energy Strategy (LARES)

County Galway's Local Authority Renewable Energy Strategy (LARES) is included as Appendix 1 of the GCDP. The LARES for Galway sets out guidance designed to allow County Galway to both contribute to meeting the national legally binding targets while also capitalising on those opportunities associated with the generation and harnessing of renewable energy in a sustainable manner. The vision as outlined in the LARES is as follows:

> *"To facilitate and encourage renewable energy generation and a low carbon energy transition across County Galway, in the interests of future generations, through the application of energy efficient technology and the harnessing of indigenous renewable energy resources, whilst respecting the need to conserve areas of environmental, cultural and economic value."*

The LARES *"encompasses the entire county of Galway, and comprehensively considers the key sources of renewable energy in the county. The role of non-renewable energy, such as gas, is also incorporated into the LARES to facilitate the transition to a low carbon economy."*

The following relevant key objectives in the LARES in relation to the Proposed Project are identified in **Table 5-3** below:

Table 5-3 Relevant policy from the LARES in relation to the Proposed Project

Policy	Description	Proposed Project Compliance
LARES Policy Objective 3 - Renewable Energy Generation	*"To facilitate and support appropriate levels of renewable energy generation in County Galway, in light of the need to transition to a low carbon economy and to reduce dependency on fossil fuels."*	The Proposed Project will facilitate the production of renewable energy and will contribute to meeting the country's binding targets in relation to renewable energy, helping the transition to a low carbon economy.
LARES Policy Objective 13 Wind Energy Generation	*"To increase renewable energy generation levels from wind energy developments in County Galway, given*	The Proposed Project has the potential to generate c79.2MW of renewable energy which will be connected to the National

	the recognised wind energy potential of the County."	grid and will contribute towards increased renewable energy generation from wind energy in County Galway.
LARES Policy Objective 14 National Wind Energy Guidelines	*"All onshore wind energy developments shall comply with the National Wind Energy Development Guidelines or any subsequent version thereof"*	The Proposed Project has been designed in accordance with all relevant planning policy requirements including the 2006 Wind Energy Development Guidelines (the Guidelines) and the 2019 draft Wind Energy Development Guidelines (the draft Guidelines).
LARES Policy Objective 15 Acceptable in Principle	*"Wind energy development proposals in the areas that are 'Acceptable in Principle' for renewable energy development will be considered in accordance with the LARES and the proper planning and sustainable development of the area."*	The Proposed Project is partially located in an area classified as 'Acceptable in Principle' (6 of 11 turbines) in the LARES, aligning with its policy objectives, and is fully in accordance with all relevant development management standards, policies and guidelines.
LARES Policy Objective 16 Open to Consideration	*"Wind energy development proposals in areas that are identified as 'Open to Consideration' for wind energy development will be considered in accordance with the LARES and the proper planning and sustainable development of the area."*	The Proposed Project is partially located in an area classified as ''Open to Consideration' (5 of 11 turbines) in the LARES, aligning with its policy objectives, and is fully in accordance with all relevant development management standards, policies and guidelines.

A primary aim of the LARES is to set out one integrated, comprehensive suite of policy objectives for renewable energy development in Galway that seek to encourage wind energy developments at appropriate locations and to guide the location and design of new proposals. The LARES identifies areas within the County according to a hierarchy from the most optimal down to areas not generally considered suitable.

As shown in **Figure 5-2**, the LARES classification (outlined in the LARES Map 15) that applies to the Proposed Project site is 'Acceptable in Principle' (AIP) (6 of the 11 turbines) and 'Open To Consideration' (OTC) (5 of 11 turbines). The LARES outlines that applications for wind turbines in the AIP areas are areas where wind energy development will be facilitated as an appropriate land use, subject to conformance with the LARES and the proper planning and sustainable development of the area. Wind turbines located in OTC areas are open to development, also subject to conformance with the LARES and the proper planning and sustainable development of the area.

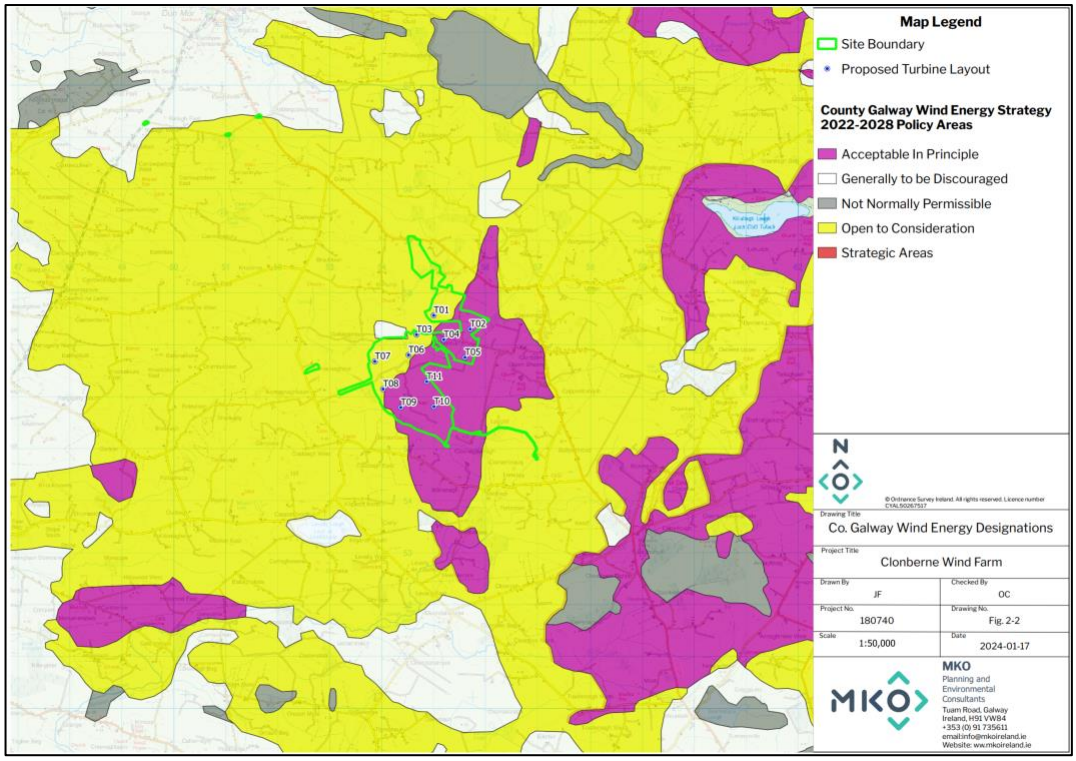

Figure 5-2 Co. Galway Wind Energy Designations

As set out in the EIAR, the Proposed Wind Farm has been designed in accordance with the opportunities and sensitivities set out in the LARES and presents an appropriate and suitable opportunity for wind energy development. Having regard to the factors listed above, the Proposed Wind Farm is in close proximity to the existing energy transmission network and road network, requires minimal vegetation removal and has suitable wind speeds. Furthermore, the Proposed Wind Farm has few sensitivities constraining wind energy development. The site is not prone to landslides or flooding and is not located within an ecologically protected area. The population density is between 20 and 50 persons per square kilometre which is the second lowest category on the population density map. As such it is considered that the Proposed Wind Farm is in accordance with the aims and objectives of the LARES and represents an opportunity to increase the supply of renewable electricity to the national grid on a suitable site.

5.4.1.3 Grid Connection

In relation to electricity, it is the policy objective of the Council to work in conjunction with Eirgrid to protect existing electricity infrastructure, and to facilitate the timely delivery of new electricity infrastructure. As such, the Council have stated their support of EirGrid's *Implementation Plan 2017-2022* and *Transmission Development Plan 2016* and notes that strong electricity infrastructure and transmission grid is essential in order to meet the Country's critical climate change targets. In that vein the GCDP states

> *"A strong electricity infrastructure and transmission grid is essential for the county in order to attract and retain high-tech industrial investment, to ensure competitive energy supplies, to achieve balanced development, to reduce dependency on fossil fuels, and to achieve climate change targets."*

Specific relevant policies of the Plan in relation to the proposed Grid Connection are included in **Table 5-4** below:

Table 5-4 Policy Objectives of the GCDP relating to the proposed Grid Connection.

Policy	Description	Proposed Project Compliance
EG1 Enhancement of Electricity Infrastructure	*"Support and promote the sustainable improvement and expansion of the electricity transmission and distribution network that supply the County, while taking into consideration landscape, residential, amenity and environmental considerations."*	The Proposed Project will include 220kV infrastructure to facilitate the connection and distribution of the renewable energy generated by the Proposed Wind Farm.
EG 2 Delivery of Electricity and Gas Infrastructure	*Support the provision and extension of electricity and gas transmission networks within the county which are critical to the economic development of the County subject to environmental quality, landscape, wildlife, habitats or residential amenity.*	The Proposed Project supports the provision of a secure and reliable electricity transmission infrastructure and transmission grid which is vital to ensure that a reliable electricity supply is available.
EG3 Power Capacity	*"To support and liaise with statutory and other energy providers in relation to power generation, in order to ensure adequate power capacity for the existing and future needs of the County"*	The Proposed Project will contribute positively to the levels of renewable electricity on the national grid. This will aid in ensuring there is adequate capacity for the growing energy needs of the Country.
EG4 Ireland's Grid Development Strategy	*Support the implementation of Ireland's Grid Development Strategy, while taking into account landscape, residential, amenity and environmental considerations.*	The Proposed Project will support the the implementation of Ireland's Grid Development Strategy by contributing to the establishment of a secure and dependable electricity transmission grid. The Proposed Project has been subject to a rigorous design process informed by a comprehensive planning and environmental assessments and surveys, which have collectively concluded that the proposal is in line with proper planning and sustainable development of the area.

5.4.2 Development Management Standards

Chapter 15 of the GCDP sets out the development management standards that apply to a wide range of developments and which are required to be considered as part of the planning application process. Section 15.13.3 relates to 'Renewable Energy Proposals' with development management standard 69 directly applicable to the Proposed Wind Farm, which states as follows: When assessing a wind energy planning application, the Council will consider the proposal with regard to:

- *The Wind Energy Development Guidelines for Planning Authorities, DoEHLG, (2006) and any amendments to the Guidelines which may be made;*
- *The Local Authority Renewable Energy Strategy.*

In addition to the above, Development Management Standard 69 outlines the local considerations taken into account by the Council in relation to a wind energy planning application and these are reproduced below for clarity. The list of development management standards is not exhaustive and other factors may be considered by the Councill on a case-by-case basis. The Proposed Project is assessed against each of the development management standards in Table 5-5 below.

Table 5-5 Wind Energy Development Management Standards

Local considerations taken into account by the Council	Compliance
Impact on the visual amenities	The proposed turbines are sited over 720m (4 x tip height) from the nearest dwelling in a landscape which has a Low sensitivity to wind energy developments. A substantial magnitude of change to the Proposed Wind Farm site and the immediate surroundings is acknowledged, however the LVIA concludes that no Significant landscape effects have been identified and Significant visual effects only have potential to occur at a low number of residential properties located within certain areas identified within 1km of the proposed turbines. Overall, visibility of the Proposed Project throughout the LVIA Study Area is deemed to have no Significant effects.
Impact on the residential amenities of the area	The Proposed Wind Farm has been designed to avoid or mitigate against potential impacts on residential amenity. A 4 x tip height set back, set out in the Draft Guidelines for visual amenity purposes is achieved from all Sensitive receptors. The criteria set out in the Guidelines in relation to Noise and Shadow flicker are achieved and will also be adhered to. The Proposed Wind Farm will also be capable of achieving the criteria set out in the Draft Guidelines. Traffic related impacts will be short term during the construction phase.
Scale and layout of the project, any cumulative effects due to other projects and the extent to which the impacts are visible across the local landscape	The cumulative impact of the Proposed Project and other projects in the area is considered in each chapter of the EIAR. The full list of the projects considered is included in Appendix 2-1 of the EIAR. The LVIA finds, as concluded in Chapter 14 of the EIAR, that the Proposed Wind Farm is deemed to be acceptable from a landscape and visual perspective. The photomontages, prepared by MKO and included in Volume 2 of the EIAR, illustrates the impact of the project on existing views with other existing, permitted and proposed wind turbines included.

Visual impact of the proposal with respect to protected views, scenic routes and sensitive landscapes (Class 2, 3 and 4)	The Proposed Wind Farm site is located in the Northern Galway Complex' which has a rating of Low sensitivity in the GCDP.The visual assessment of 1 no. protected view scoped in for full assessment found no Significant visual effects within the LVIA Study Area. In terms of other sensitive visual receptors, such as recreational, cultural heritage and tourist destinations, settlements and transport routes, visual effects were predominantly deemed either Moderate, Slight, Not Significant, or Imperceptible.There are no designated scenic routes within County Galway in the LVIA Study Area. It is considered that the Proposed Wind Farms impact on the landscape is appropriate given that the development of wind energy is a strategic aim of the GCDP. As set out in the LVIA in Chapter 14 of the EIAR, no significant Landscape or Visual effects will occur as a result of the proposed turbines on designated protected views or scenic routes.
Impact on nature conservation, ecology, soil, hydrology, groundwater, archaeology, built heritage and public rights of way	The EIAR concludes that the Proposed Wind Farm will not have any significant impacts on ecology, soil, hydrology, groundwater, archaeology and the built environment. No public rights of way are interfered with as part of the Proposed Wind Farm.
Impact on ground conditions and geology	A walkover survey, including geological mapping and investigations of the Site, were undertaken by David Broderick of HES (refer to Section 8.1.2 above for qualifications and experience) on 5th March, 10th & 11th May, 21st & 22nd June, 10th August, 21st December 2021, on 19th January and 6th April 2022 and on 28th March 2023. A Peat Stability Risk Assessment and Peat Management Plan were undertaken by Gavin and Doherty Geosolutions (GDG, Feb 2024) for the Proposed Project. The objectives of the intrusive site investigations included mapping the distribution and depth of peat and mineral subsoils at the Wind Farm site and Grid Connection along with assessing the mineral subsoil / bedrock conditions at key Proposed Project locations (i.e. proposed turbines, substation, 2 no. temporary construction compounds, existing and proposed access roads, borrow pit location, grid cable route and substation). This data was used to inform the final layout design. No significant impacts on land, soil and geological environmental are anticipated during the

	construction, operation or decommissioning phases of the Proposed Project. The land, soils and geology impact assessment undertaken in this chapter outlines that significant effects will not occur due to the localised nature of the construction works and therefore there is no potential for cumulative effects. Please refer to Chapter 8 of the EIAR for further details.
Consideration of falling distance plus an additional flashover distance from wind turbines to overhead transmission lines	The nearest overhead transmission line is 2.15km east of turbine 10. This is above the 3.5 x rotor diameter setback distance as of EirGrid's Policy on Clearance to Overhead Lines.[4]
Impact of development on the road network in the area	As detailed in Chapter 14 (Material Assets – Traffic and Transport), there will be there will be a short-term imperceptible negative impact on traffic volumes during the construction phase of the Proposed Wind Farm. A detailed Traffic Management Plan incorporating all the mitigation measures will be agreed with the roads authority prior to construction works commencing on site.
Impact on human health in relation to noise disturbance (including consistency with the Word Health Organisations 2018 Environmental Noise Guidelines for the European Region), shadow flicker and air quality	Based on the assessment detailed in Chapter 5 of the EIAR and the mitigation measures proposed, there will be no significant effects related to human health, including shadow flicker, noise or air quality from the Proposed Wind Farm.
Proposals for the decommissioning of the project following cessation of use or expiry of the permitted duration of use.	A Decommissioning Plan is proposed as Appendix 4-6 of the EIAR. The decommissioning phase of the Proposed Wind Farm is also considered in each chapter of the EIAR.

5.4.3 Landscape Character Assessment

Galway County Council have prepared a Landscape Character Assessment that is contained in *Appendix 4* of the GCDP. This Landscape Character Assessment categorises Galway County into different Landscape Character Types (LCTs). The Proposed Project is located within the North Galway Complex Landscape LCT. This LCT is described as:

> *"An extensive grassland plain stretching from the Suck River in the east to the watershed of the River Clare in the west. It includes elevated areas such as Slieve Dart in the north, as well as lakes, turloughs, raised bogs, wetlands and winding rivers. Agriculture, scattered forestry and associated field patterns are very mixed and can exhibit large and abrupt changes of character over very short distances, especially in areas around bogs. It has a dense network of smaller settlements and roads, though at a lower density than the southern plains of the county. Open areas around bogs produce extensive sky views and the area that are free from light pollution."*

[4] *https://www.eirgridgroup.com/site-files/library/EirGrid/Wind-Turbine-Clearance-Policy.pdf*

The Landscape Character Assessment for County Galway further describes this LCT as follows:

> *"The appearance and character of this landscape is very varied. Most consists of a plain that undulates with gentle slopes and occasional elevated areas like Knockma or Slieve Dart. Areas of high-quality grassland, large bogs and forestry can all be encountered in close proximity.*
>
> *Settlement occurs throughout this landscape, interconnected with a dense network of small roads that also serve extensive areas of dispersed rural housing on smaller holdings. Settlement is, generally, less dense towards the north-east because this part of the county contains large areas of blanket and raised bog, often interspersed with large areas of forestry.*
>
> *The large size of some of the bogs within this landscape provide areas of distinctive character and solitude where natural processes are still dominant. The Suck River lies within a shallow and distinctive lowlands that define much of the eastern boundary of this landscape.*
>
> *A history of less intensive development has resulted in a wealth of intact family-based local knowledge, place names and relatively undisturbed sites of historical importance such as Glinsk Castle.*
>
> *A history of less intensive development has resulted in a wealth of intact and relatively undisturbed sites of historical importance."*

It is further stated in the Landscape Character Assessment that within this LCT the sensitivities are noted as *"Open countryside offers frequent extensive panoramic views from local highpoints."*

This LCT is further categorised into Landscape Character Units (LCUs), which can be seen on *Map 04: North Galway Complex & Shannon Environs Landscape Units* of the Landscape Character Assessment of the GCDP. The Proposed Project is located within the LCU 5e – North River Clare Basin Unit, which is described as an *"Extensive, largely level plain with low enclosure. A long-settled working landscape of large regular stone-walled fields. Extensive areas of bog in east. Transition zone from bog areas to east."* in the GCDP. This LCU and other LCUs within the LCA Study Area (15km from the nearest proposed turbine) are discussed in further detail below in Section **Error! Reference source not found.**, as well as in Appendix 14-2, which contains the full landscape character assessment tables.

> **For purposes of clarity, continuity and reference to mapping figures in this chapter; designated LCUs and LCAs are prefixed by the first letter of the county in which it is located e.g., 'G' for Galway and 'R' for Roscommon. The last number in each label corresponds to the label or number assigned to each designation in the respective county development plans (e.g., G – LCU5e = Galway – Landscape Character Unit 5e).*

The magnitude of change at the site of the Proposed Wind Farm and the immediate surroundings is acknowledged in Chapter 14 of the EIAR, the LVIA. However, the area is not recognised as a landscape of any regional or national value or importance. The Proposed Wind Farm site is located within an Area of Low Sensitivity to wind energy developments. The Proposed Wind Farm site itself and its immediate setting do not comprise any unique landscape receptors of county, regional or national interest. It is also noted that no significant cumulative landscape and visual impacts are likely to occur with any existing, permitted or proposed wind farm developments. It is therefore concluded in the LVIA that the Proposed Wind Farm is deemed to be acceptable from a landscape and visual perspective. Photomontages of the Proposed Wind Farm are provided in Volume 2 of the EIAR

5.4.4 Summary Of Compliance with Planning Policy

In summary, the provision of renewable energy developments such as the Proposed Project is strongly supported by International, National, Regional and Local policies and guidelines aimed at achieving the transition to a low carbon and climate resilient economy, increasing renewable energy generation, and enhancing energy security. Specifically, the Proposed Project will contribute to achieving the target of generating 9GW of electricity from onshore wind and reducing GHG emissions by 80% by 2030 as set out in the CAP23.

The project aligns with National Strategic Outcomes and Objectives outlined in the NPF, particularly Objective 55, which seeks to promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050.

It is re-iterated that the Proposed Project is consistent with the the GCDP, which acknowledges the importance of renewable energy in reducing anthropogenic greenhouse gas emissions and the contribution of renewable energy in achieving national and EU target net zero greenhouse gas emissions by 2050. In addition, the Proposed Project is located in an area classified as 'Acceptable in Principle' and 'Open To Consideration', which are identified in the LARES as the two most favourable areas for wind energy development in County Galway. The Proposed Project will progress the Development Plan's target of increasing the county's wind energy capacity to 965MW, enabling the county to reach its ambition to:

> *"reduce the carbon footprint by integrating climate action into the planning system in support of national targets, support indigenous renewable sources in order to reduce dependence on fossil fuels and improve security of supply and the move to a competitive low carbon economy."*

Furthermore, the landmark agreements at COP 28 has emphasized the global recognition for transitioning away from fossil fuels and increasing the penetration of renewable energy sources into the electricity market. The agreement will play a crucial role in raising awareness and encouraging countries to prioritize the development and adoption of renewable energy technologies.

In summary, the Proposed Project provides the opportunity to capture an additional part of County Galway's valuable renewable energy resource. If the Proposed Project were not to proceed the opportunity to capture this additional part of Galway's valuable renewable energy resource would be lost, as would the opportunity to contribute to meeting Government and EU targets for the production and consumption of electricity from renewable resources and the reduction of greenhouse gas emissions. The opportunity to generate local employment and investment associated with the Proposed Project (and consequently, the Proposed Grid Connection) would also be lost.

6. PLANNING ASSESSMENT

The Proposed Project has been subject to a rigorous design process informed by a comprehensive planning and environmental assessments and surveys, which have collectively concluded that the proposal is in line with proper planning and sustainable development of the area. The Proposed Project has been designed in compliance with the Wind Energy Development Guidelines, 2006 (2006 WEDGs) and it has been demonstrated that the requirements of the Draft Revised Wind Energy Development Guidelines (2019 Draft WEDGs) can also be achieved. Specifically, there are no significant environmental impacts associated with the Proposed Project during the construction, operational or decommissioning phases of the development nor will it have any significant effects on any European Sites. Any potential environmental impacts will be minor and can be addressed through standard mitigation measures. The following section provides a planning assessment of the Proposed Project under the following key material considerations.

6.1 Principle of Development

The principle of development is considered to be established in so far as the Proposed Project is located in an area deemed *'Open to Consideration'* and *'Acceptable in Principle'* as set out in the LARES of Galway County, subject to proper planning and sustainable development, and the guidelines set out in the LARES. Furthermore, it is pertinent to emphasize that the overarching thrust of policy in the GCDP is one of support for the deployment of renewable energy. Policy RE 3 within the GCDP directly supports Renewable Energy Generation *"to meet national, regional and county renewable energy targets, to facilitate a reduction in CO2 emissions and the promotion of a low carbon economy."* This sentiment also exists in the Regional Strategy for the Northern & Western Regional Assembly, which states in RPO 4.18 that it is an objective to "*Support the development of secure, reliable and safe supplies of renewable energy, to maximise their value, maintain the inward investment, support indigenous industry and create jobs."*

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

The Proposed Project provides the opportunity to realise the valuable renewable energy resource. If the Proposed Project were not to proceed the opportunity to capture this additional part of Galways valuable renewable energy resource would be lost, as would the opportunity to contribute to meeting Government and EU targets for the production and consumption of electricity from renewable resources and the reduction of greenhouse gas emissions.

6.2 Residential Amenity

When considering the amenity of residents in the context of a Proposed Project, there are three main potential impacts of relevance: 1) Shadow Flicker, 2) Noise, and 3) Visual Amenity. Shadow flicker and noise are quantifiable aspects of residential amenity while visual amenity is more subjective.

In relation to Noise and Shadow Flicker, it is noted that the recommended limits of the Wind Energy Development Guidelines, 2006 (2006 WEDGs) have been achieved and this is discussed further in Chapter 12 and Chapter 5 of the EIAR, respectively.

Specifically in relation to Noise, the assessment carried out as part of the EIAR has confirmed that the operational noise levels from the Proposed Project meet the Total WEDG Noise Limits at all Noise Assessment Locations

In relation to Shadow Flicker, where exceedances are predicted, suitable mitigation measures are outlined in Chapter 5 of the EIAR which will be employed at the potentially affected properties to ensure that the limits set out in the 2006 WEDGs are not exceeded at any dwelling within the Shadow Flicker Study Area. It is also noted that the Proposed Project can be brought in line with the requirements of the Draft Revised Wind Energy Development Guidelines (2019 Draft WEDGs) should they be adopted while this application is in the planning system, through an alteration of the implementation of the mitigation measures outlined.

Following consideration of the residual effects (post-mitigation) it is noted that the Proposed Project will not result in any significant effects on Human Beings in the area surrounding the Proposed Project. Following appropriate mitigation, the DoEHLG Wind Energy Guideline shadow flicker limits will not be exceeded at any property.

The third aspect of Residential Amenity is visual amenity. A comprehensive assessment of the Landscape and Visuals effects of the Proposed Project is provided in Chapter 14 of the EIAR. Overall, no Significant landscape effects have been identified and Significant visual effects only have potential to occur at a low number of residential properties located within certain areas identified within 1km of the proposed turbines. Overall, visibility of the Proposed Project throughout the LVIA Study Area is deemed to have no Significant effects.

Overall, it has been demonstrated in the accompanying EIAR that an appropriate balance has been achieved in delivering a suitably designed wind farm that protects the Residential Amenity of the sensitive properties surrounding the Site.

6.3 Biodiversity

MKO were appointed to provide ecological assessment of the Proposed Project. The final design takes account of all Site environmental constraints (e.g., ecology, archaeology, hydrology, peat depths etc.) and design constraints (e.g., third party lands, underground electrical cables). The final design also takes account of the findings from the site investigations and baseline assessments that have been carried out during the EIAR process. The Proposed Project is supported by a Natura Impact Statement and Chapter 6: Biodiversity of the EIAR.

The Site is outside of any designated Natural Heritage Area, proposed Natural Heritage Area, Special Area of Conservation and Special Protection Areas. Those located within the Likely Zone of Impact have been identified in Chapter 6, Section 5.1.1.1.1 of the EIAR.

Multidisciplinary walkover surveys were undertaken on the 28th June 2019, 15th July 2019, 19th August 2019, 5th August 2021, 24th August 2021, 24th January 2022, 30th September 2022, 1st October 2022, 26th June 2023, 1st September 2023, 23rd November 2023 and 18th January 2024. Surveys were conducted throughout a range of seasons including optimum periods for vegetation surveys and habitat mapping. Bat surveys were also carried out throughout 2022. A comprehensive walkover of the entire site was completed also.

Provided that the Proposed Project is constructed and operated in accordance with the design, best practice and mitigation that is described within this application, significant impacts on Biodiversity are not anticipated at any geographic scale.

Please refer to Chapter 5 of the EIAR for further details.

6.3.1 Appropriate Assessment and NIS

Screening for Appropriate Assessment was carried out for the Proposed Project, which found that it could not be concluded beyond reasonable doubt, in the view of best scientific knowledge, on the basis of objective information and in light of the conservation objectives of relevant European sites, that the subject development, individually or in combination with other plans and projects, would be likely to have a significant effect on the following European Site:

- Lough Corrib SAC [000297]
- Levally Lough SAC [000295]

As a result, an Appropriate Assessment is required, and a Natura Impact Statement (NIS) has been prepared in respect of the Proposed Project.

The resulting NIS which accompanies this application, provides an assessment of all potential direct or indirect adverse effects on European Sites whether considered individually or in combination with other plans and projects. Where the potential for any adverse effect on any European Site has been identified, the pathway by which any such effect may occur has been robustly blocked through the use of avoidance, appropriate design and mitigation measures as set out within this report and its appendices. The measures ensure that the construction, operation and decommissioning of the Proposed Project will not adversely affect the integrity of any European Sites. Therefore, it can be objectively concluded that the Proposed Project, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site.

Please refer to the NIS that accompanies the Proposed Project for further details.

6.4 Lands, Soil and Geology

Chapter 8 of the EIAR contains a full assessment of the potential likely and significant effects of the Proposed Project on Land, Soils and Geology aspects of the receiving environment.

A walkover survey, including geological mapping and investigations of the Site, were undertaken by David Broderick of HES on 5th March, 10th & 11th May, 21st & 22nd June, 10th August, 21st December 2021, on 19th January and 6th April 2022 and on 28th March 2023.

A Peat Stability Risk Assessment and Peat Management Plan were undertaken by Gavin and Doherty Geosolutions (GDG, Feb 2024) for the Proposed Project.

The objectives of the intrusive site investigations included mapping the distribution and depth of peat and mineral subsoils at the Wind Farm site and Grid Connection along with assessing the mineral subsoil /bedrock conditions at key Proposed Project locations (i.e. proposed turbines, substation, 2 no. temporary construction compounds, existing and proposed access roads, borrow pit location, grid cable route and substation). This data was used to inform the final layout design.

No significant impacts on land, soil and geological environmental are anticipated during the construction, operation or decommissioning phases of the Proposed Project.

The land, soils and geology impact assessment undertaken in this chapter outlines that significant effects will not occur due to the localised nature of the construction works and therefore there is no potential for cumulative effects.

Please refer to Chapter 8 of the EIAR for further details.

6.1 Hydrology and Hydrogeology

An assessment of the potential likely and significant effects of the Proposed Project (Proposed Wind Farm and Proposed Grid Connection) on water aspects (hydrology and hydrogeology) of the receiving environment was also carried out.

No significant impacts to surface water (quality and flows) and groundwater (quality and quantity, and any local groundwater wells) will occur as a result of the Proposed Project provided the proposed mitigation measures are implemented. This EIAR presents proven and effective mitigation measures to mitigate the release of sediment which will reduce the concentration of suspended solids to acceptable levels. The storage and handling of hydrocarbons/chemicals will be carried out using best practice methods which will ensure the protection of surface and groundwater quality. The Proposed Project drainage system will be designed to slow surface water runoff from the proposed site by providing greater attenuation. This will ensure that the Proposed Project does not alter downstream surface water flows and will not contribute to downstream flooding.

A Flood Risk Assessment was carried out at the early design stage of the Proposed Project in order to keep as much of the proposed infrastructure outside of mapped flood zones as possible. The Proposed Project will not increase flood risk in the area of the Site.

The EIAR acknowledges that the Gurteen/Cloonmore GWS spring is a very important local water supply that serves a wide population in the area, and that it is classified as an extremely sensitive water supply source. Considering the springs importance and potential sensitivity to impacts from the Proposed Project detailed hydrogeological investigations/monitoring was undertaken that further advances the knowledge of the ZoC/SPA to the Gurteen/Cloonmore GWS spring. This new knowledge with regard the ZoC/SPA along with our understanding of the geological/hydrogeological setting of the Site means this important local water supply can be managed and protected during all phases of the Proposed Project. Potential effects on other nearby sources (i.e. Dunmore/Glenamaddy PWS and Gallagh GWS) were screened out for further assessment due to lack connectivity with the Site.

A hydrological assessment of potential impacts on local designated sites was undertaken. Lough Corrib SAC is located downstream of the Site and is considered very sensitive to affect. Following implementation of the appropriate mitigation measures as outlined in the EIAR no significant impacts on this designated site will occur as a result of the Proposed Project.

A Water Framework Directive (WFD) Compliance Assessment has been completed for all waterbodies (surface water and groundwater bodies) with the potential to be impacted by the Proposed Project. With the implementation of the mitigation measures detailed in this EIAR there will be no change in the WFD status of the underlying groundwater body or downstream surface waterbodies as a result of the Proposed Project. The Proposed Project has been found to be fully compliant with the WFD and will not prevent any waterbody from achieving its WFD objectives.

An assessment of potential cumulative effects associated with the Proposed Project and other developments on the hydrological and hydrogeological environment has been completed. With the implementation of the mitigation measures detailed in this EIAR, the cumulative assessment found that there will be no significant effects on the hydrological and hydrogeological environments.

Please refer to Chapter 9 of the EIAR for further details.

6.2 Climate

An assessment of the potential significant direct and indirect effects on climate arising from the construction, operation and decommissioning of the Proposed Project has also been completed as part of the EIAR. The objective of the assessment is to assess the potential effects that the Proposed Project

may have on Climate and sets out proposed mitigation measures to avoid, reduce or offset any potential significant effects that are identified.

Based on the Scottish Government carbon calculator, the Proposed Project will result in the loss of 134,051tCO_2e during the construction phase, the details of these carbon losses are provided in Table 11-6 of Chapter 11 of the EIAR. The Proposed Project will have an export capacity of approximately 79.2MW and therefore will help contribute towards the achievement of national and international emission reduction targets, provide much needed grid infrastructure, and the capacity to offset 72,217tCO_2e per annum, or 2,527,595tCO_2e over its operational lifetime, thereby reducing the greenhouse gas effect. Carbon losses to the atmosphere due to changes in soil and ground conditions and due to the construction and operation of the Proposed Project will be offset by the Proposed Project in approximately 22 months of operation.

Potential cumulative effects on climate between the Proposed Project and other permitted or proposed projects and plans in the area, (wind energy or otherwise), as set out in Section 2.9 in Chapter 2 of this EIAR, were also considered as part of this assessment. While there will be greenhouse gas emissions associated with the construction of the Proposed Project, this will take place under the Electricity sector emissions ceiling and will be offset by the operation of the Proposed Project within its operational life. Any cumulative impact and consequential effect that occurs during the decommissioning phase are similar to that which occur during the construction phase, be it of less impact. The mitigation measures prescribed for the construction phase of the Proposed Project will be implemented during the decommissioning phase thereby minimising any potential cumulative effects.

Following construction of the Proposed Project, there will be a Permanent Imperceptible Negative Effect on Climate as a result of greenhouse gas emissions from construction plant and vehicles, embodied carbon associated with the turbines and construction materials. Operation of the Proposed Project will have a Direct Long-Term Moderate Positive Effect on climate as a result of reduced greenhouse gas emissions.

Please refer to Chapter 11 of the EIAR for further details.

6.3 Archaeology and Cultural Heritage

An assessment of the potential effects of the Proposed Project on the Cultural Heritage resource was carried out. Cultural heritage includes archaeology, architectural heritage and any other tangible assets. The assessment was based on desktop research, field survey, GIS based mapping, ZTV, and was also assisted by representative photomontages and photowire images.

Where potential effects have been identified appropriate mitigation measures have been proposed in order to minimise any such effects. Proposed mitigation includes a 20m buffer zone around enclosure GA030-073—, pre-development archaeological testing of the Proposed Project infrastructure (turbine bases, hardstands, compounds, new roads, grid connection in greenfield and peatland areas, etc) and archaeological monitoring during the construction stage of the Proposed Project.

Potential indirect effects on the setting of any UNESCO World Heritage Sites and those on a Tentative List within 20km, National Monuments within 10km, recorded monuments within 5km and RPS/NIAH structures within 5km were included in order to assess potential effects on setting in the wider landscape. The ZTV was utilised to assess the level of theoretical visibility of the proposed turbines from cultural heritage assets within the 5km and 10km study areas.

All cultural heritage assets within 100m of either side of the proposed Grid Connection route were assessed for potential effects to same. No direct effects to the recorded archaeological, architectural or cultural heritage resource as a result of the proposed Grid Connection have been identified. Mitigation measures are recommended where deemed appropriate and include archaeological testing of

greenfield and peatland areas along the Proposed Grid Connection underground cabling route and associated infrastructure.

An assessment of potential cumulative effects was also undertaken taking into consideration other extant planning applications and existing and proposed wind farms within 25km. While some potential cumulative visual effects to the wider setting of cultural heritage assets is possible when considered with the existing, permitted and proposed wind farms, no significant cumulative impacts have been identified and no cumulative effects to the immediate setting of cultural heritage assets will occur.

An assessment of potential cumulative effects was also undertaken taking into consideration other extant planning applications and proposed wind farms within 20km. While some potential cumulative visual effects to the wider setting of cultural heritage assets is possible when considered with the proposed wind farms, no significant cumulative impacts have been identified and no cumulative effects to the immediate setting of cultural heritage assets will occur.

Please refer to Chapter 11 of the EIAR for further details.

6.4 Landscape and Visual Impact Assessment

The Landscape and Visual Impact Assessment (LVIA) considers direct and indirect effects on landscape resources, landscape character and designated landscapes. It examines the nature and extent of effects on existing views and visual amenity, including residential visual amenity. The effects of the Proposed Project are assessed during the construction, operational and decommissioning phases of the Proposed Project. The LVIA also consider cumulative effects i.e., the incremental effects of the Proposed Project in combination with other plans and/or projects.

The landscape area where the Proposed Project is located in an extensively flat, agricultural landscape. ZTV mapping (**Error! Reference source not found.**) indicates full theoretical visibility within 5km of the proposed turbines, with occasional patches of limited visibility due to slight elevations. The flat nature of the landscape in the LVIA Study Area results in widespread theoretical visibility throughout, although it is noted that the landcover typical within the LVIA Study Area will substantially inhibit actual visibility on the ground. On-site surveys found that most actual visibility occurs within 5km of the Site, with intermittent views beyond this distance where the turbines appear as background elements, often visually screened by intervening vegetation.

Overall, the landscape has been deemed to have a low sensitivity to wind energy development, considering its current land use and is capable of accommodating a wind energy development of the scale proposed, given the scale of the landscape and the levels of screening existent within it.

In conclusion, no Significant landscape effects have been identified and Significant visual effects only have potential to occur at a low number of residential properties located within certain areas identified within 1km of the proposed turbines. Overall, visibility of the Proposed Project throughout the LVIA Study Area is deemed to have no Significant effects.

Chapter 14 of the EIAR contains the full landscape and visual assessment carried out for the Proposed Project in accordance with various guidelines for wind energy and visual assessment.

6.5 Material Assets

The EIAR also provides an assessment of the likely significant effects of the Proposed Project on roads, traffic and transport of the traffic movements that will be generated during the construction, operational and decommissioning phase of the Proposed Project.

For developments of this nature, the construction phase is the critical period with respect to the traffic effects experienced on the surrounding road network in terms of the additional traffic volumes that will be generated on the road network, and the geometric requirements of the abnormally large loads associated with the wind turbine components. The requirements of the additional traffic and abnormal loads generated during the construction stage were assessed on the external highway network that will provide access to the Proposed Wind Farm. Locations where remedial measures are required to accommodate the abnormal loads are identified.

The magnitude of the increase in traffic volumes experienced on the surrounding network is identified during the various construction stages of the Proposed Project. A preliminary traffic management plan is also provided in Section 15.2.13.5 of the EIAR aimed at minimising the traffic impact on the local highway network. Refer also to Appendix 15-1 of this EIAR, for the Traffic Management Plan.

During the construction phase of the Proposed Development the extent of the impact identified, ranges from a slight to moderate and temporary negative effect. Once the Proposed Project is operational the traffic impact created by maintenance staff will be imperceptible. The residual effect for the decommissioning phase will be less than that outlined for the construction stage and will be slight to imperceptible.

Please refer to Chapter 15 of the EIAR for further details.

7. SUMMARY AND CONCLUSION

The provision of wind energy developments such as the one proposed is strongly supported by International, National, Regional and Local policies and guidelines aimed at achieving the transition to a low carbon and climate resilient economy, increasing renewable energy generation, and enhancing energy security. Specifically, the Proposed Project will contribute to achieving the target of generating 9GW of electricity from onshore wind and reducing GHG emissions by 80% by 2030 as set out in the CAP.

The Proposed Project aligns with National Strategic Outcomes and Objectives outlined in the National Planning Framework, particularly Objective 55, which seeks to promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050.

It is re-iterated for clarity that the Proposed Project is consistent with the GCDP which acknowledges the importance of renewable energy in reducing anthropogenic greenhouse gas emissions and the contribution of renewable energy in achieving national and EU target net zero greenhouse gas emissions by 2050.

Furthermore, the Proposed Project is located in an area classified as 'Acceptable in Principle' and 'Open To Consideration' in the LARES which outlines that applications for wind turbines are considered appropriate in these areas, subject to conformance with the LARES and the proper planning and sustainable development of the area. In this regard it is reiterated that the Proposed Project has been subject to a rigorous design process informed by comprehensive planning and environmental assessments and surveys, which have collectively concluded that the proposal is in line with the proper planning and sustainable development of the area. Specifically, there are no significant environmental impacts associated with the Proposed Project during either the construction, operational or decommissioning phases of the development nor will the Proposed Project have any significant effects on any European Sites (as assessed within the accompanying Natura Impact Statement). Furthermore, the Proposed Project will support the Council in achieving its objectives to

The Climate Action Plan 2024 estimates that an 8-times increase in renewable energy deployment to 2.3GW annually is required between 2024 and 2030 to reach climate and energy targets. To achieve this, greater alignment between local plans and national and regional renewable energy targets is urgently required. Given the scale of the challenge, it is clear that every viable site brought forward for wind energy development must be considered on its individual merit and suitability, regardless of the current zoning status.

To combat the effects of climate change, Ireland must decarbonise its economy by 2050. There is no "silver bullet" to do so. It will take hundreds, if not thousands, of individual renewable energy projects to decarbonise the Irish economy. The scale of the challenge we face to decarbonise the Irish economy is enormous, but the climate change implications of not doing so are even greater. There is no other way to decarbonise a modern society except through renewable energy projects such as the Proposed Wind Farm.

Having regard to the key points set out in this Report, it is respectfully requested that the Board consider the relevant planning context that applies, and grants permission for the Proposed Project which is the subject of this application