Planning and Environmental Consultants

Planning Report

Knockshanvo Wind Farm and Grid Connection, Co. Clare.

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EXECUTIVE SUMMARY

The Proposed Knockshanvo Wind Farm consists of 9 no. wind turbines located in Co. Clare. The 7 no. wind turbines will have an overall tip height range of 179.5m – 185m, a rotor diameter range of 149m – 163m, and a hub height of 102.5m to 110.5m. The Proposed Knockshanvo Wind Farm will be henceforth referred to using the following terminology, as defined in Chapter 1 Section 1.1.1 of the EIAR: 'The Proposed Development', 'The Site', the 'Wind Farm Site', and the 'Grid Connection'. The Proposed Wind Farm will connect to the national grid via a 110kV underground grid connection cable from a proposed 110kV onsite substation to the national grid at Ardnacrusha 110kV substation.

The planning application for the Proposed Wind Farm is being submitted directly to the Board as a Strategic Infrastructure Development (SID) in accordance with Section 37E of the Planning and Development Act, 2000 (as amended). A design flexibility opinion issued by An Bord Pleanála (Case Reference ABP-319151-24) on 21st May 2024 accompanies the Wind Farm application. The details unconfirmed in this application are the turbine tip height, rotor diameter and hub height. The range of parameters under which the turbine dimensions will fall are specified on the notices and in the design flexibility opinion that accompanies this application. A separate planning application for the Proposed Grid Connection works will be submitted to An Bord Pleanála in accordance with Section 182A of the Planning and Development Act 2000, as amended as it is considered that both the components and function of the Proposed Grid Connection fall within the scope of Section 182A (1) of the Act, based upon the definition of electricity transmission as set out in Subsection 9 of Section 182A. (Case Reference ABP-317763-23).

This planning report has been prepared in support of the application for the Proposed Development which is accompanied by an Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS). This report is structured to provide a comprehensive analysis of the Proposed Development, beginning with an overview in Section 1 and progressing through the project's background and planning history in Section 2. Section 3 details the Proposed Development itself, while Section 4 traces the evolution of the wind farm design. Section 5 reviews pertinent planning policies at various governance levels, and Section 6 Provides a planning assessment of the Proposed Development. Finally, Section 7 provides a concluding statement on the Proposed Development's contribution to the proper planning and sustainable development of the area.

The Proposed Development is strongly supported by EU and national policy and legislation. At an EU level the Proposed Development is supported by the EU Renewable Energy Directive and Repowered. At a national level, the Proposed Wind Farm is supported by the National Planning Framework, Climate Action Plan 2024, the National Energy Security Framework, among other national climate and energy policies. The legally binding greenhouse gas emission reduction target and the obligations of public bodies under the Climate Act 2015 (as amended) should also be considered in the assessment of these applications. A full appraisal of all the relevant policy and legislation is provided in section 4 of this report.

The development of sites viable for wind energy development is essential to meet European, national, and local climate and renewable energy targets. Ireland needs to scale up onshore wind energy development at an unprecedented rate to achieve our 9GW target and 80% RES-E target set out in the Climate Action Plan 2024 (CAP 24). The reality of achieving these targets is the installation of over 600MWs of wind energy per year until 2030. If permitted, the Proposed Development will be installed and operational before the end of the decade, adding over 50MW of renewable, clean energy to our national wind energy capacity. This will not only contribute to the decarbonisation of the electricity sector but will play a role in the decarbonisation of other sectors and the transition to a low carbon, climate resilient economy.

The Proposed Wind Farm turbines are wholly located within an area designated primarily as a 'Strategic Area' and also partially within an area which is designated as 'Acceptable in Principle'. Both areas are considered suitable for wind energy development as outlined in the WES. The Proposed Development will support the Council in achieving its objective to ensure the security of energy supply by

accommodating the development of wind energy resources. The site has been selected because it has favourable characteristics for wind energy development and the site has a sufficient quantum of unconstrained land with good wind resources and limited environmental constraints.

To conclude, it is submitted that, based on the evidence provided in this report, the Proposed Development site is suitable for energy development and the Proposed Wind Farm is in accordance with the proper planning and sustainable development of the area and County Clare as a whole.

1. INTRODUCTION

1.1 Preamble

This Planning Report has been prepared by MKO on behalf of FuturEnergy Knockshanvo Designated Activity Company, to accompany a planning application to An Bord Pleanála (the Board) for planning permission for works associated with the proposed Knockshanvo Wind Farm and Grid Connection, located at Knockshanvo and adjacent townlands, Co. Clare. For ease, as set out in Chapter 1 of the EIAR,

- Where the '**Proposed Development'** is referred to, this relates to all the project components described in detail in Chapter 4 of this EIAR i.e. Wind Farm Site and Grid Connection as detailed below.
- 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. Generally, the study area extends beyond the planning application site boundary depending on the requirements of individual assessments. Individual topics for assessment purposes, i.e., each chapter, will indicate the study area used for that topic. The planning application red line boundary occupies a smaller area within the primary EIAR Site Boundary. The EIAR Site Boundary represents the primary area of study and not necessarily areas where proposed works will occur as part of the Proposed Development.
- Where the **'Wind Farm Site'** is referred to, this refers to turbines and associated foundations and hard-standing areas, meteorological mast, junction accommodation works, access roads, temporary construction compounds, 110kV electrical substation, underground cabling, borrow pits, site drainage, tree felling and all ancillary works.
- Where **'Grid Connection'** is referred to, this refers to the underground 110kV electrical cabling and all associated site development works connecting the Wind Farm Site to the existing Ardnacrusha 110kV electrical substation.

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 Development 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 Developments consistency with the relevant planning policy documents at national, regional and local levels.

This planning application for the Proposed Wind Farm is being submitted directly to the Board as a Strategic Infrastructure Development (SID) in accordance with Section 37E of the Planning and Development Act, 2000 (as amended). The Proposed Wind Farm will have an estimated total generating capacity of greater than 50MW and therefore it 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'*). 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-319215-24).

A design flexibility opinion issued by An Bord Pleanála (Case Reference ABP-319151-24) on 21st May 2024 accompanies the Wind Farm application. The details unconfirmed in this application are the turbine tip height, rotor diameter and hub height. The range of parameters under which the turbine dimensions will fall are specified on the site notice and in the design flexibility opinion that accompanies this application.

A separate planning application for the Proposed Grid Connection works will be submitted to An Bord Pleanála in accordance with Section 182A of the Planning and Development Act 2000, as amended as it is considered that both the components and function of the Proposed Grid Connection fall within the scope of Section 182A (1) of the Act, based upon the definition of electricity transmission as set out in Subsection 9 of Section 182A. (Case Reference ABP-317763-23)

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 Development.

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 Development.

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

2. PROJECT BACKGROUND

2.1 The Applicant

The prospective applicant for the Proposed Development is FuturEnergy Knockshanvo Designated Activity Company (DAC). FuturEnergy Knockshanvo DAC is a wholly owned subsidiary of FuturEnergy Ireland Holdings. FuturEnergy Ireland are an Irish-owned, joint venture company with Coillte and ESB, which launched in November 2021. Combining the Irish State's strongest assets and expertise in renewable energy development, FuturEnergy Ireland's mission is to maximise the potential of our unique wind and land resources and accelerate Ireland's transformation to a low carbon energy economy.

Coillte's portfolio of proposed wind farm projects and its Renewable Energy division transferred to FuturEnergy Ireland in Q4 2021. FuturEnergy Ireland is part of the company's wider strategic plan and commitment to creating a sustainable future. ESB, through its Brighter Future strategy, is furthering its investment in and commitment to onshore wind generation in Ireland, one of the main technologies underpinning the clean electricity systems that will power our society into the future.

FuturEnergy Ireland's ambition is to develop more than 1GW of renewable energy capacity by 2030 and make a significant contribution to Ireland's commitment to produce 80% of electricity from renewable sources by the end of the decade. Using their knowledge and expertise, FEI aim to develop wind farms in a responsible manner with the support of local host communities thereby enabling Ireland, and its people, to combat climate change and contribute to a better, brighter world.

2.2 Site Location and Context

The Wind Farm Site is located approximately 3 km south of Broadford, 3.5 km southeast from Kilkishen, and 4 km northeast from Sixmilebridge, Co. Clare. The site is accessed via local roads from the R465 Regional Road, which travels in a north-south direction between Broadford and Ardnacrusha, the R471 Regional Road which travels east-west between Sixmilebridge and Clonlara and the Crag Local Road, which travels in a northeast-southwest direction between Sixmilebridge and Broadford. The Wind Farm Site is served by a number of existing forestry roads and a public road running through the middle of the site..

Current land-use on the Wind Farm Site comprises coniferous forestry, biodiversity areas under Coillte management and third party lands currently being used for agriculture and forestry. Current land-use along the Grid Connection comprises of public road corridor and coniferous forestry. Land-use in the wider landscape comprises a mix of agriculture, low density residential and commercial forestry.

2.3 Planning History

A planning history search of all planning application within both the Wind Farm and Grid Connection redline boundary was undertaken in August 2024. A planning history search was carried out through Clare County Council, Limerick County Council and the Board's planning portals and is set out in **Tables 2-1** and **Table 2-2** below. The long list of applications which have been considered in the cumulative assessment of this EIAR are included as **Appendix 2-2** of the EIAR.

Table 2-1 Planning applications within the Wind Farm Site Boundary.

Pl Ref	Description	Decision
ABP-318782-23	Planning Permission to develop a Windfarm and Ancillary Infrastructure within the townlands of Ballycr (North), Belvoir, Cloghera, Cloonsheerea, Cloontra, Cloontra East, Cloontra West, Crag, Derrynaveagh, Derryvinnan, Drumsillagh, Sallybank (Merrit), Droomsillagh or Sallybank	Decision Due

	(Parker), Gortacullin, Knockbrack Lower, Knockshanvo, Kyle, Mountrice, Oatfield and Snaty, Co.Clare	
03/2325	To construct an extension to an existing dwelling house.	Permission granted 12/02/2004

Table 2-2 Planning Applications within the Grid Connection Site Boundary.

Pl. Ref	Description	Decision
2460351	To RETAIN changes to original house plans submitted for grant of planning permission P8/10268, and for detached shed and all associated site development works	Decision Due 23/09/2024
24218	To construct a slatted slurry storage tank with associated site works	Decision Due 01/09/2024
ABP-318782-23	Planning Permission to develop a Windfarm and Ancillary Infrastructure within the townlands of Ballycr (North), Belvoir, Cloghera, Cloonsheerea, Cloontra, Cloontra East, Cloontra West, Crag, Derrynaveagh, Derryvinnan, Drumsillagh, Sallybank (Merrit), Droomsillagh or Sallybank (Parker), Gortacullin, Knockbrack Lower, Knockshanvo, Kyle, Mountrice, Oatfield and Snaty, Co.Clare	Decision Due
2348/ ABP-317705-23	For a Medical Centre and all associated site works	Granted Permission by An Bord Pleanála 05/07/2024
2337	To fill land with topsoil, subsoil, stone and inorganic construction material to raise the level of the land for agricultural purposes. A Natura Impact Statement is included with the application.	Granted Permission 21/12/2023
23148/ ABP-317227-23	for development of a wind farm in the townlands of Fahy Beg, Fahy More North, Ballymoloney, Ballyknavin (Ed O'Briensbridge), Balllyquin More, Woodpark and Leitrim, Co Clare together with the development of an underground grid connection cable to the national grid. The underground grid connection is located primarily within the public road within the townlands of Leitrim, Fahy More South, Ballybrack, Aharinaghmore, Tooreen (Ed Cloghera) Aharinaghbeg, Knockdonagh, Roo East, Blackwater, Rosmadda West, Parkroe, Lackyle (Ed Ballyglass) and Castlebank, Co Clare.	Granted Permission by An Bord Pleanála 21/03/2024
21799	for the construction of a new fully serviced two storey detached dwelling house, new single storey detached garage, new vehicular entrance landscaping and boundary treatments, new connection to existing Roo West group water scheme and installation of a new wastewater treatment system and percolation area together with all ancillary and associated site works	Granted Permission 28/10/2021
21843	to construct dwelling house, garage, bored well, waste water treatment system, percolation area, entrance and all associated site works	Granted Permission 08/11/2021
23209	to construct dwelling house, garage, waste water treatment system, percolation area, entrance and all associated site works	Granted Permission 30/08/2023
2298	for a preschool facility, entrance and all associated site works	Granted Permission 01/09/2022
20961	for a dwelling house, entrance and all associated site works	Granted Permission 05/05/2021

21451	to construct dwelling house, garage, bored well, waste water treatment system, percolation area, entrance and all associated site works	Granted Permission 04/11/2021
19118	to construct garage and all associated site works	Granted Permission 04/05/2019
191013	to RETAIN a development at Cois Sionna, Lackyle, Ardnacrusha, Co Clare. The development consists of a) The connection of an unauthorized garage and home office/study to an existing dwelling, b) an unauthorized extension linking the existing unauthorized garage to the existing dwelling house, c) an unauthorized enclosed porch to the front of the dwelling house, d) an unauthorized connection to an existing foul sewer. The Permission to RETAIN is being sought for an unspecified period of time	Granted Permission 27/03/2020
16970	to demolish 180m2 of existing structure and construct a Dairy Parlour and extend cubicle house, along with ancillary site works	Granted Permission 12/03/2017
16713	for the demolition of existing lean-to extension to rear of dwelling house, construction of a new bedroom extension to rear of dwelling house to include internal alterations and modifications, alterations to windows on existing elevations and construction of a single storey granny flat extension to the rear of existing dwelling house and all associated site works	Granted Permission 04/12/2016

2.4 Pre- Application Engagement

2.4.1 Scoping

As part of the constraints mapping process, which is detailed in Chapter 3 of this EIAR, Ai Bridges were commissioned to evaluate the possible impacts that the proposed Wind farm development at Knockshanvo, Co. Clare could have on existing telecommunications operator networks. Telecommunications operators, were initially contacted in October 2020 in order to determine the presence of telecommunications links or aviation assets traversing or located in close proximity to the Site. In August 2023, Ai Bridges undertook a new round of telecom operator consultations, to reflect the new 9-turbine layout. None of the Telecommunication Operators contacted during the consultation process raised any concerns regarding telecommunications networks operating in the licence-exempt frequency bands. There was no impacts reported by any of the telecommunications operators operating GSM Radio Access, Mobile Broadband Data Access, Tetra or Telemetry networks.

A scoping report, providing details of the Proposed Development, was prepared by MKO and circulated to prescribed statutory bodies in January 2023 with follow up scoping taking place in January 2024. The scoping document provided details of the Proposed Development and set out the scope of work for the EIAR. Consultees were invited to contribute to the EIAR by suggesting baseline data, survey techniques and potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR.

Appendix 2-1of the EIAR contains all scoping responses received. The comments of the consultees will be considered in the construction, operation and decommissioning of the Proposed Development 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.

2.4.2 Pre- Applications Meetings

2.4.2.1 Clare County Council

Members of the project team first met with Clare County Council in November 2022. The purpose of this meeting was to discuss the Community Engagement and provide a high-level introduction to the Proposed Development. We also note that in November 2022, the design team met with Clare County Council to discuss the importance and methodology of Community Engagement and Consultation, which has been carried out at a high-level at the beginning of the early design stages of this project.

Members of the project team and the Applicant met with representatives from Clare County Council in accordance with Section 247 of the Planning and Development Act 2000 (as amended) (the Act) via MS teams on the 5th April 2023.

The project team gave an overview of the Proposed Development in the form of a PowerPoint presentation.

A second meeting with representatives from Clare County Council under Section 247 of the Act took place on the 7th December 2023 via MS teams.

The project team gave an update on the Proposed Development in the form of a PowerPoint presentation which set out the following information.

For further information, please refer to Section 2.6.4.1 of the EIAR.

2.4.3 An Bord Pleanála

2.4.3.1 Section 37B Consultation

The Applicant engaged with An Bord Pleanála under the provisions of Section 37B of the Planning and Development Act 2000 (as amended), as to whether the Proposed Development would meet the thresholds of the Seventh Schedule of the Planning and Development Act, 2000, as amended. The applicant opened consultations with the Board in February 2023 in relation to a Proposed Development of approximately 9 no. wind turbines and all associated works including the provision of a dedicated looped grid connection to the existing 110kV Ardnacrusha substation or a dedicated 110kV connection to Drumline 110kV substation at Knockshanvo and adjacent townlands, Co. Clare.

A SID meeting under the provisions of Section 37B was held with the Board on the 4th May 2023(ABP-315797-23).

The design team gave an overview of the Wind Farm element of the Proposed Development in the form of a PowerPoint presentation.

On the 10th October 2023, MKO, on behalf of the Applicant, sought to close the consultation process with An Bord Pleanála. On the 15th of November 2023, the Board wrote to the applicant and confirmed that consultation was closed and that the Wind Farm Site was considered to be strategic infrastructure within the meaning of Section 37A and such any application for approval of the Wind Farm Site should be made directly to the Board.

A second Section 37B Pre-Application Consultation Meeting (ABP-319215-24) was held with An Bord Pleanála on the 4th April 2024 in respect of opening a Section 37CC(1) Consultation under the Design Flexibility process and to determine if the Proposed Development can be classified as a Strategic Infrastructure Development under Section 37 and Section 37CC(1) Design Flexibility which is described in Section 2.4.3.2 below.

On the 29th April 2024, MKO, on behalf of the Applicant, sought to close the second consultation process with An Bord Pleanála. On the 21st May 2024, the Board wrote to the applicant and confirmed that consultation was closed and that the Wind Farm Site was considered to be strategic infrastructure within the meaning of Section 37A and such any application for approval of the Wind Farm Site should be made directly to the Board.

For further information, please refer to Section 2.6.5.1 of the EIAR.

2.4.3.2 Section 37CC(1) Consultation

The Applicant also engaged with An Bord Pleanála (ABP-319151-24) under the Planning and Development Act 2000 (as amended), in respect of the level of design flexibility to be included in the application (as defined in 15I of the Planning and Development Regulations 2001, as amended ("the Regulations") as "opinion on unconfirmed details").

A meeting under Section 37CC(1) Consultation was held with the Board on the 4th April 2024. The design team gave an overview of the details unlikely to be confirmed at application lodgement, which were set out as follows:

- Turbine total tip height,
- Turbine rotor diameter,
- Turbine hub height.

The parameters within which the turbine specifications will fall were set out as follows:

- Total tip height range of 179.5m – 185m,
- Rotor diameter range of 149m – 163m,
- Hub height range of 102.5m to 110.5m.

It was also explained to the Board that the design flexibility requirement arises as the exact make and model of the turbine cannot be confirmed prior to making the application as this will be dictated by a competitive tender process of the various turbines on the market at the time of procurement and construction, which necessitates the requirement for associated unconfirmed details to be included in the application.

On the 21st May, the Board issued an opinion under Section 37CD to the applicant and determined that if it is satisfied that it is appropriate that the proposed application be made and decided before the prospective applicant has confirmed certain details of the application which include the following:

The certain details include the following:

- Turbine Dimensions
    - Turbine Tip Height
    - Rotor Diameter
    - Hub Height

For further information, please refer to Section 2.6.5.3 of the EIAR.

2.4.3.3 Section 182E Consultation

The Applicant engaged with An Bord Pleanála under the provisions of Section 182E of the Planning and Development Act 2000 (as amended).

A SID meeting under the provisions of Section 182E was held with the Board on the 6th October 2023 (ABP-317763-23). The design team gave an overview of the proposed grid route and connection element of the Proposed Development in the form of a PowerPoint presentation.

On the 5th December 2023, MKO, on behalf of the Applicant, sought to close the consultation process with An Bord Pleanála. On the 18th January 2024 the Board wrote to the applicant and confirmed that consultation was closed and that any application for approval of the transmission development should be made directly to the Board.

For further information, please refer to Section 2.6.5.2 of the EIAR.

2.4.3.4 Pre-Application Consultation with Limerick County Council

The Applicant undertook a pre-application consultation with Limerick County Council to address the proposed temporary transition compound as part of the Proposed Development under Section 247 of the Planning and Development Act 2000 (as amended). A meeting was held with Limerick County Council and the design team on the 9th April 2024.

The design team gave an overview of the proposed temporary transition compound element of the Proposed Development in the form of a PowerPoint.

For further information, please refer to Section 2.6.4.2 of the EIAR.

2.4.4 Community Consultation

The applicant has undertaken extensive consultation with the local community. The project was first introduced to the local community in November 2022, providing an update on progress of the proposal as well as the latest draft layout. In July 2023, a further community newsletter was issued which provided more details on how this project could benefit the community and advised that issues could be further discussed with the two CLOs whose details were provided in the newsletter. In October 2023, an information webinar was conducted for the Proposed Development, presenting an overview of the project and highlighting the need for renewable energy. The webinar also provided an opportunity for participants to ask questions about the Proposed Development. In November 2023, a live virtual tour as well as a detailed brochure was issued and delivered to homes within 4km of the proposed turbines. A community clinic was held in late November to give stakeholders the opportunity to meet the Knockshanvo team and discuss any aspect of the Proposed Development. Since the initial consultation in November 2022, the appointed Community Liaison Officer's for the project have continued to be available to keep the public informed about the Proposed Development.

For further information, please refer to Section 2.6.6 of the EIAR.

3. PROPOSED DEVELOPMENT

3.1 Project Description

The proposed wind energy development will comprise of 9 No. turbines with a limited tip height range of 179.5 metres to 185 metres and all associated foundations and hardstanding areas, access roads and entrance(s) including upgrade of existing site roads and provision of new roads, 110kV electrical substation and wind farm control building(s), underground cabling, borrow pit(s), electrical cabling for 110kV grid connection, amenity works, biodiversity enhancement areas, temporary construction compounds, a permanent meteorological mast, temporary transition compound and upgrades to roads along the turbine delivery route.

The proposed Grid Connection will originate from the proposed onsite 110kV electrical substation and will be connected to the national grid via an underground cable connection to Ardnacrusha 110kV electrical substation.

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

3.2 Development as Described in Public Notices

Proposed Wind Farm

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. *Construction of 9 no. wind turbines with a blade tip height range from 179.5m to 185m inclusive, a hub height range from 102.5m to 110.5m inclusive and a rotor diameter range from 149m to 163m inclusive with associated foundations, hard-standing and assembly areas.*
II. *Construction of 1 no. permanent 110 kV electrical substation including 2 no. control buildings, lightning protection, welfare facilities, car parking, and all associated electrical plant and apparatus, security fencing, external lighting, underground cabling, wastewater holding tank and all associated infrastructure, apparatus and landscaping;*
III. *Underground electrical cabling (33kV) and communications cabling connecting the wind turbines to the proposed on-site 110kV electrical substation and associated ancillary works;*
IV. *Erection of 1 no. Meteorological Mast of 105 metres above existing ground level for the measuring of meteorological conditions, including a lightning rod which will extend above the mast;*
V. *Construction of new permanent access roads and upgrade of existing roads to provide access within the site and to connect the wind turbines and associated infrastructure;*
VI. *Construction of 1 no. new permanent access to the site off the R465 regional road to serve as the sole entrance to the wind farm during its operational phase and to facilitate the delivery of the construction materials and turbine components to site during the construction, operational and decommissioning phases;*
VII. *Construction of 2 no. new permanent access points off the L-3042 and L-30144-0 local roads to facilitate traffic movement across the site during construction, operation and decommissioning phases. Both accesses will be gated and opened when required during the operational phase;*
VIII. *Development of 5 no. borrow pits;*

IX. *Construction of 3 no. temporary construction compounds and associated ancillary infrastructure including temporary site offices, staff facilities and car-parking areas, all to be removed at end of construction phase;*
X. *Temporary works at 3 no. locations along the R465 regional road associated with the facilitation of turbine component and abnormal load delivery to site. These works will primarily include the trimming of vegetation and strengthening of road verges;*
XI. *Installation of a temporary transition compound to facilitate turbine blade delivery during the construction phase, within the townland of Court, Co. Limerick. The works will include installation of a temporary stone hard standing area and associated entrance and egress to and from the N69 national road and will be removed at the end of the construction phase.*
XII. *Permanent amenity works comprising the construction of 1 no. new marked trail, the development of 2 no. new viewing areas and upgrade to 1 no. existing viewing area, including the installation of associated signage and seating;*
XIII. *Permanent and temporary Site Drainage;*
XIV. *Operational Stage Site Signage;*
XV. *Ancillary forestry felling to facilitate construction and operation of the proposed development;*
XVI. *Biodiversity enhancement measures including the permanent clear-felling of land, and;*
XVII. *All related site works and ancillary development including landscaping considered necessary to facilitate the proposed development;*

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 planning application for underground electrical cabling (110kV) which will connect the wind farm to the existing Ardnacrusha 110kV electrical substation is also being lodged to An Bord Pleanála.

A design flexibility opinion issued by An Bord Pleanála (Case Reference ABP-319151-24) on 21st May 2024 accompanies this application. The details unconfirmed in this application are the turbine tip height, rotor diameter and hub height. The range of parameters under which the turbine dimensions will fall are specified on this site notice and in the design flexibility opinion that accompanies this application.

The proposed development is partly located within the demesne of a Protected Structure (Court country house - RPS Reg. No. 291).

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

Proposed Grid Connection

A description of the Proposed Grid Connection as set out in the public planning notices, is as follows

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

I. *The provision of underground electrical cabling (110kV) from the proposed Knockshanvo Wind Farm development to the existing Ardnacrusha 110kV electrical substation to facilitate the connection to the national grid;*

II. *Provision of 14 joint bays, communication chambers and earth sheath links along the proposed underground electrical cabling route;*

III. *Permanent and temporary Site Drainage;*

IV. *Ancillary forestry felling to facilitate construction and operation of the proposed development;*

V. Reinstatement of land, road and track surface above the proposed cabling trench;

VI. All related site works and ancillary development considered necessary to facilitate the proposed development.

The development subject of this application will facilitate the connection of the proposed 9 no. wind turbine Knockshanvo Wind Farm to the national electricity grid. A planning application for the Knockshanvo Wind Farm development 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.

3.2.2 Main Development Components

The Main development components of the Proposed Development are set out in **Table 3-1** below.

Table 3-1 Main Development Components of the Proposed Development

Wind Turbine, foundations and associated hard-standing areas.	The proposed wind turbines to be installed have an overall turbine tip height, hub height and blade length within the following ranges: • Turbine Tip Height – Maximum height of 185 metres, Minimum height 179.5 metres • Hub Height – Maximum height 110.5 metres, Minimum height 102.5 metres • Blade Length – Maximum length 81.5 metre, Minimum length 74.5 metres. The associated hardstanding areas will facilitate access and provide a safe, level working area for vehicles and machinery used in the assembly and erection of the turbine.
Underground Electrical and Communications Cabling	Each turbine will be connected to the on-site 110 kV electricity substation via an underground 33 kV electricity cable. Fibre-optic cables will also connect each wind turbine to the wind farm control buildings in the onsite substation compound.
Temporary Construction Compound	3 no. temporary construction compounds are proposed for the Wind Farm Site. Construction compound 1 and 2 measuring approximately 3,060 square metres in area will be located at the western and central section of the site. Construction compound 3 measuring approximately 6,240 in area will be located east of the site, adjacent to the proposed new access road approximately 65 metres to the west of Turbine No. 9, and approximately 700 metres east of the electricity substation. The construction compound will include temporary site offices, staff facilities and car-parking areas for staff and visitors.
Temporary Transition Compound	A temporary transition compound is proposed adjacent to the N69, in the townland of Court, Co. Limerick, to facilitate turbine blade delivery. The compound measures approximately 200m along the N69 and 60m in width. Turbine components are generally transported at night when traffic is lightest and this is done in consultation with the roads authorities and An Garda Síochána, and special permits are generally required
Meteorological Mast	A 105-metre meteorological mast of the self-supporting type equipped with wind monitoring equipment and lightening mast on top will be constructed onsite. The mast will be constructed on a hard standing area measuring 21m by 14m which will also accommodate the crane that will be used to erect the mast.

	Approximately 75 m of new track roads will be required to access the meteorological mast hard standing area.
Site Entrances and onsite tracks/roads	To facilitate the access, delivery and construction of the project, a number of existing site access tracks are required to be upgraded and new access tracks proposed.
Wind Farm Site Entrances	It is proposed to construct 1 no. new permanent access to the site off the R465 regional road to serve as the sole entrance to the wind farm during its operational phase and to facilitate the delivery of the construction materials and turbine components to site during the construction, operational and decommissioning phases. It is also proposed to construct 2 no. new permanent access points off the L-3042 and L-30144-0 local roads to facilitate traffic movement across the site during construction, operation and decommissioning phases. Both accesses will be gated and opened when required during the operational phase.
Borrow Pit	It is proposed to develop 5 no. onsite borrow pits to obtain rock and hardcore material for use during the construction phase of the Proposed Development. Post-construction, the borrow pits areas will be permanently secured and a stock-proof fence will be erected around the borrow pit areas to prevent access to these areas.
Amenity Works	The Proposed Development will provide approximately 1.4km of a dedicated amenity trail in the form of a new track within and connecting to the 12 O'Clock Hills Trailhead. Two new viewing areas and one upgrade to an existing viewing area will be provided by the Proposed Development. Seating, signage and fixed binoculars are proposed for these two viewing areas, where there will be long-ranging views available.
Temporary Works associated with Turbine Component and Abnormal Load Delivery	Temporary works will take place at 3 no. locations along the R465 regional road associated with the facilitation of turbine component and abnormal load delivery to site. These works will primarily include the trimming of vegetation and strengthening of road verges.
Tree Felling	As part of the Proposed Development, tree felling will be required within and around the development footprint to allow the construction of turbine bases, bat buffers, access roads, and the other ancillary infrastructure.
Biodiversity Enhancement Measures	It is proposed to reduce the impact on foraging hen harrier through enhancement of the surrounding lands. A total of 50.41 hectares of forested land is proposed for enhancement. This forestry will be permanently clear-felled, and the habitat restored to one that is suitable for foraging hen harrier. A further 74.38 hectares of land is proposed for enhancement, which will consist of managing farmland to improve this habitat for foraging hen harrier. Please see Appendix 6-5 Biodiversity Enhancement Management Plan for full details.
Grid Connection	It is proposed to construct a 110kV substation at the eastern end of the Wind Farm Site and to connect from here to the existing Ardnacrusha 110kV substation via underground 110kV electrical cabling, measuring approximately 9.2 km in total, utilising public local road networks, existing Coillte forest access tracks, existing private forestry access tracks and private agricultural lands.

	The underground cabling works will consist of the installation of ducts in an excavated trench to accommodate power cables, and a fibre communications cables to allow communications between the proposed 110kV onsite substation and the existing 110kV Ardnacrusha substation. The proposed Grid Connection will involve 2 No. bridge crossings including 2 No. horizontal directional drilling (HDD) crossings. The underground cable will encounter 5 no. water culverts along the Grid Connection route.

A site location map of the Proposed Wind Farm and Proposed Grid Connection is provided in **Figure 3-1**, **Figure 3-2** and **Figure 3-3 below**. A full description of the Proposed Development is provided in Chapter 4 of the EIAR.

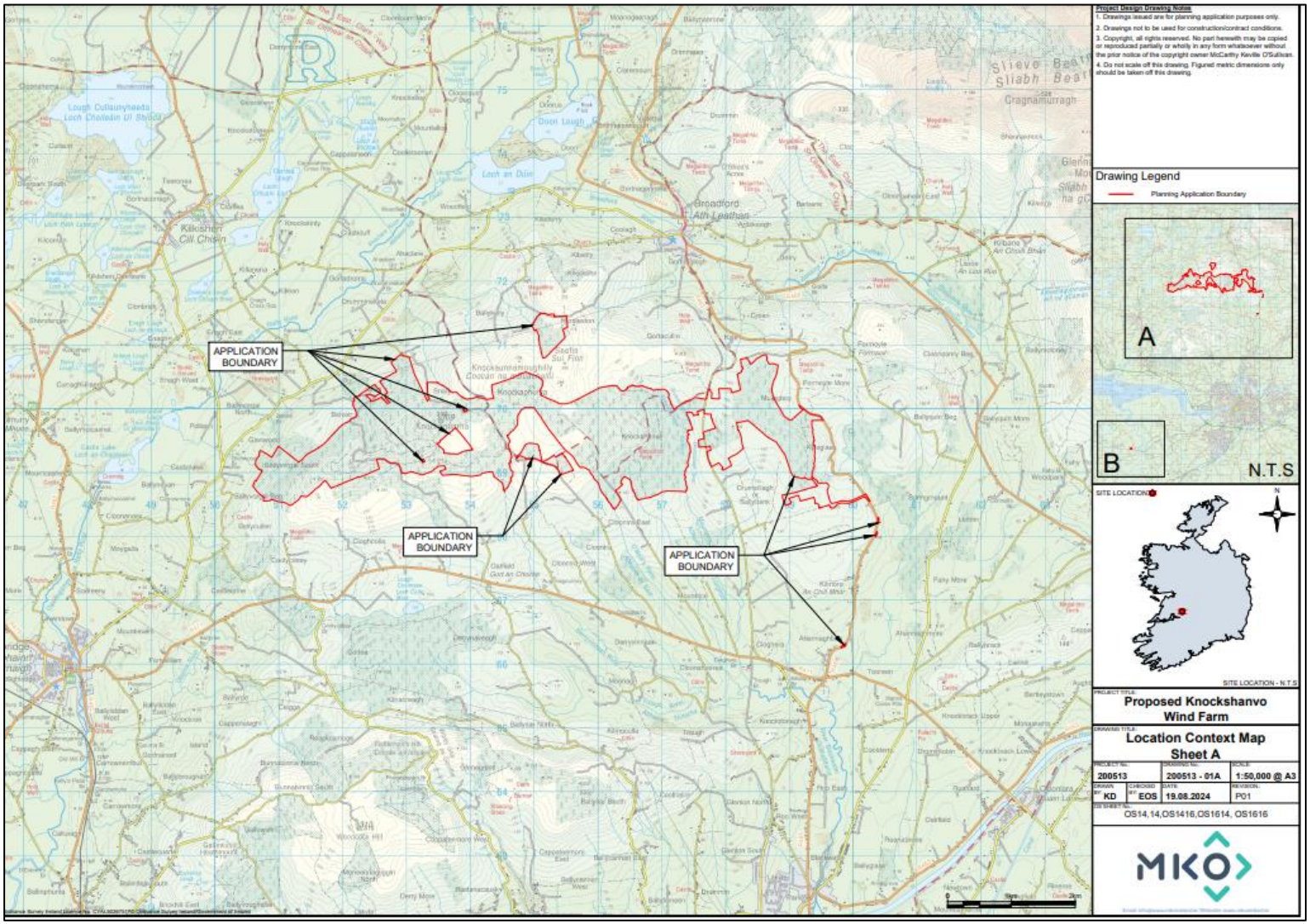

Figure 3-1 Proposed Wind Farm Site Boundary 1 of 2

Figure 3-2 Proposed Wind Farm Site Boundary 2 of 2

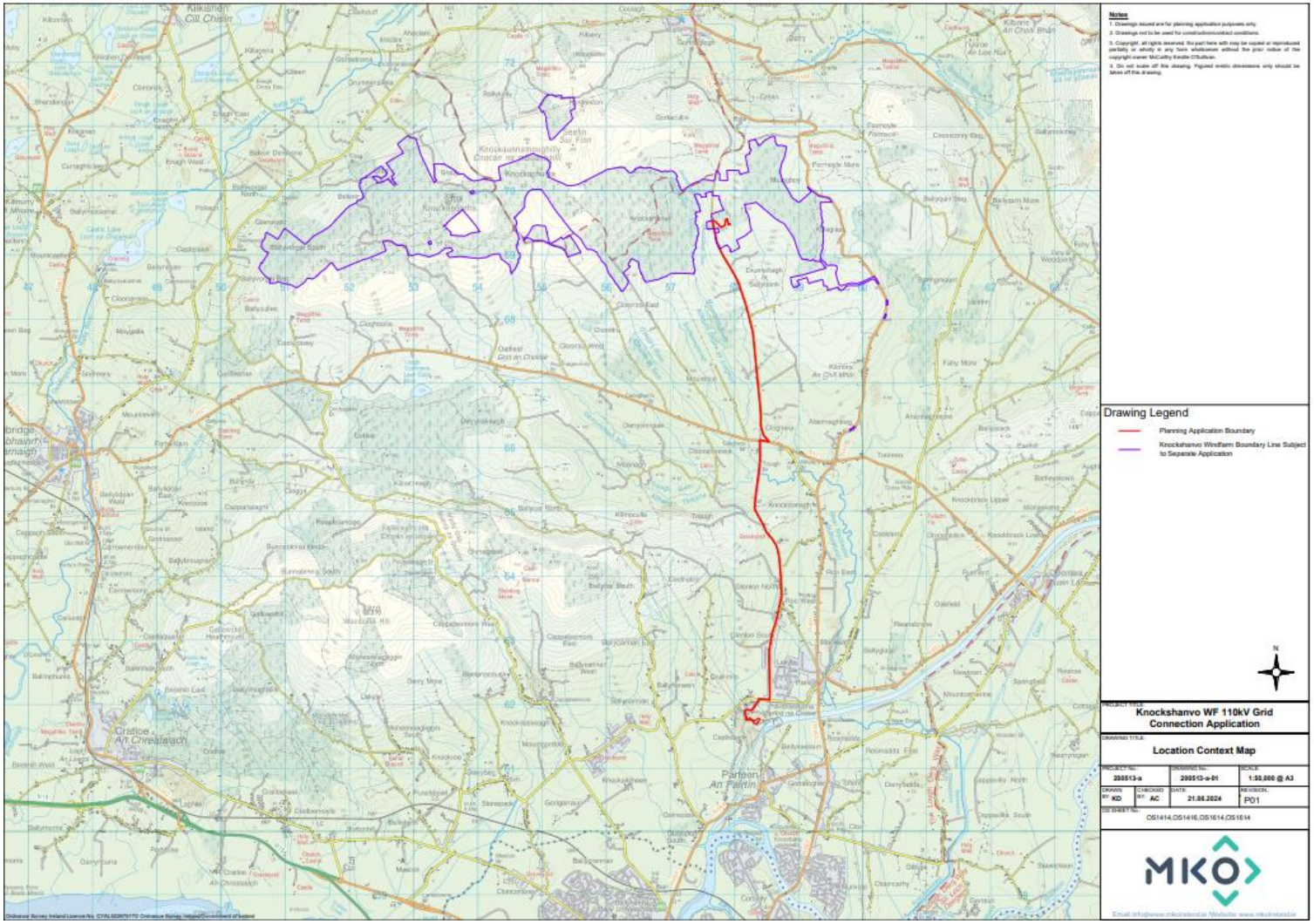

Figure 3-3 Proposed Grid Connection Site Boundary

4. PROJECT DESIGN PROCESS

The design of the Proposed Development 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 Screening

FuturEnergy Ireland (FEI) undertook a detailed screening process in 2014 and again in 2017, through Geographical Information Spatial (GIS) software, using a number of criteria and stages to assess the potential of a large number of possible sites, on lands within Coillte's stewardship (c. 441,000 hectares), suitable to accommodate a wind energy development. The GIS database drew upon a wide array of key spatial datasets such as forestry data, ordnance survey land data, house location data, transport, existing wind energy and grid infrastructure data and environmental data such as ecological designations, landscape designations and wind energy strategy designations available at the time.

The screening process included the following phases:

- Phase 1 – Initial Screening
- Phase 2 – Proximity to National Grid
- Phase 3 – Screening

A full description of the screening process is outlined in Section 3.3 of the EIAR.

4.2 Suitability of the Candidate Site

Knockshanvo, as a candidate site, was further examined under the following criteria:

- **Planning Policy** - The Wind Farm Site is located within an area designated primarily as a 'Strategic Area' with the site also partially located within an area which is designated as 'Acceptable in Principle'
- **Proximity of Existing Grid Infrastructure** - The Wind Farm Site is located within relatively close proximity (c. 10km) of 2 no. existing electrical substations and therefore a wind energy development at this location has multiple options for connection to the national electricity grid.
- **Designated Sites** - There are no Natura 2000 or nationally designated sites located within the Proposed Development boundary.
- **Average Wind Speeds** - With the upland nature of the landscape, the Wind Atlas shows that wind speeds on the Wind Farm Site range from 7.5m/s to 9.25m/s at a 100m elevation. Such wind speeds indicate that this site is viable for commercial wind energy development.
- **Population Density** - The population density of the Population Study Area as described in Chapter 5: Population and Human Health of this EIAR is 24.22 persons per square kilometre. This is significantly lower than the average national population density of 73.27 persons per square kilometre.

The Knockshanvo site is located within an existing commercial forestry property which allows the site to take advantage of existing access roads. This, when combined with the relatively close proximity of the existing 110kV Ardnacrusha electrical substation and 110kV Drumline electrical substation, and associated electricity transmission infrastructure, further highlights the suitability of the site as it can make further sustainable use of these established items of infrastructure.

The Knockshanvo site does not overlap with any environmental designations and is also located in an area with a very low population density, relative to the national average, with viable annual wind speeds.

Please refer to Section 3.3 of the EIAR for further details.

4.3 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 2006 Guidelines") and the *'Best Practice Guidelines for the Irish Wind Energy Industry)* (Irish Wind Energy Association, 2012).

An initial 18 no. turbine layout was proposed following a preliminary desk-based constraints assessment. A more detailed constraints mapping exercise was then carried out to inform the final proposed turbine layout.
The detailed constraints mapping process involved the placing of buffers (separation distance) around different types of constraints so as to identify clearly the areas within which no development works will take place. The size of the buffer zone for each constraint has been assigned using standards presented in the documents listed above. The constraints maps for the site encompasses the following constraints and associated buffers:

- Residential dwellings plus a minimum 750 metre buffer (meeting the requirement of 4 x maximum tip height separation distance as required by the draft Guidelines. Although not adopted, the developer has applied the setback in this instance as it is considered best practice.) (Refer to Chapter 5 Population and Human Health of EIAR);
- Designated sites plus 100 metre buffer (Refer to Chapter 6 Biodiversity of EIAR);
- A 750m Biodiversity Exclusion Zone buffers (Refer to Chapter 7 Ornithology of EIAR);
- Rivers and streams plus 50 metre buffer (Refer to Chapter 9 Hydrology & Hydrogeology of EIAR);
- Recorded Archaeological Sites and Monuments/Protected Structures plus 50 metre buffer (Refer to Chapter 14 Cultural Heritage of the EIAR);
- Telecommunication Links plus operator specific buffer (Refer to Chapter 15 Material Assets of EIAR).

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

- Available lands for development;
- Good wind resource; and
- Existing access points and general accessibility of all areas of the site due to existing forestry road infrastructure.

The final proposed turbine layout was then developed to take account of all the constraints mentioned above including their associated buffer zones and the separation distance required between them. Following the mapping of all known constraints described above, detailed site investigations were carried out by the project team.

The final proposed turbine layout takes account of all site constraints and the distances to be maintained between turbines and from houses, roads, etc. The layout is based on a combination of the results of all site investigations and surveys that have been carried out during the EIAR process, the community

engagement process that began in 2022 (Refer to Appendix 2-4 of this EIAR) and the scoping with statutory and non-statutory consultees (refer to Section 2.6 of this EIAR). As information regarding the site of the Wind Farm Site was compiled and assessed, the proposed layout has been revised and amended to take account of the physical constraints of the site and the requirement for buffer zones and availability of land as well as cumulative impacts.

4.4 Turbine Layout Iterations

The development of the final Proposed Wind Farm layout has resulted following feedback from the various studies and assessments carried out as well as ongoing negotiations and discussions with landowners and the local community.

There were several reviews of the specific locations of the various turbines and site infrastructure during the optimisation of the Proposed Wind Farm site layout. The preliminary desk-based constraints assessment identified a potentially developable area suitable for approximately 18 no. turbines.

Following the application of ornithological, telecommunication, dwelling and aviation buffers, Proposed Turbine Layout Iteration No. 2 reduced the Wind Farm Site to 9 no. turbines. Following detailed constraints mapping exercises, environmental site walkovers, and feedback from the project team, the 9-no. turbine design (i.e. Iteration No. 2) was taken forward and refined further.

The final proposed turbine layout takes account of all site constraints (ecology, ornithology, geology, hydrology, cultural heritage, telecommunications and aviation, and design constraints (setback distance from dwellings and third-party lands/infrastructure and distances between turbines on-site). The layout also takes account of the results of all site investigations and baseline assessments that have been carried out during the EIAR process. 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.

5. PLANNING POLICY CONTEXT

This section of the planning report provides an overview of the relevant planning policies that apply to the Proposed Development and sets out an appraisal of the Proposed Development against the relevant planning policy context.

As is detailed in the following sections, the policy context that applies to the Proposed Development 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.

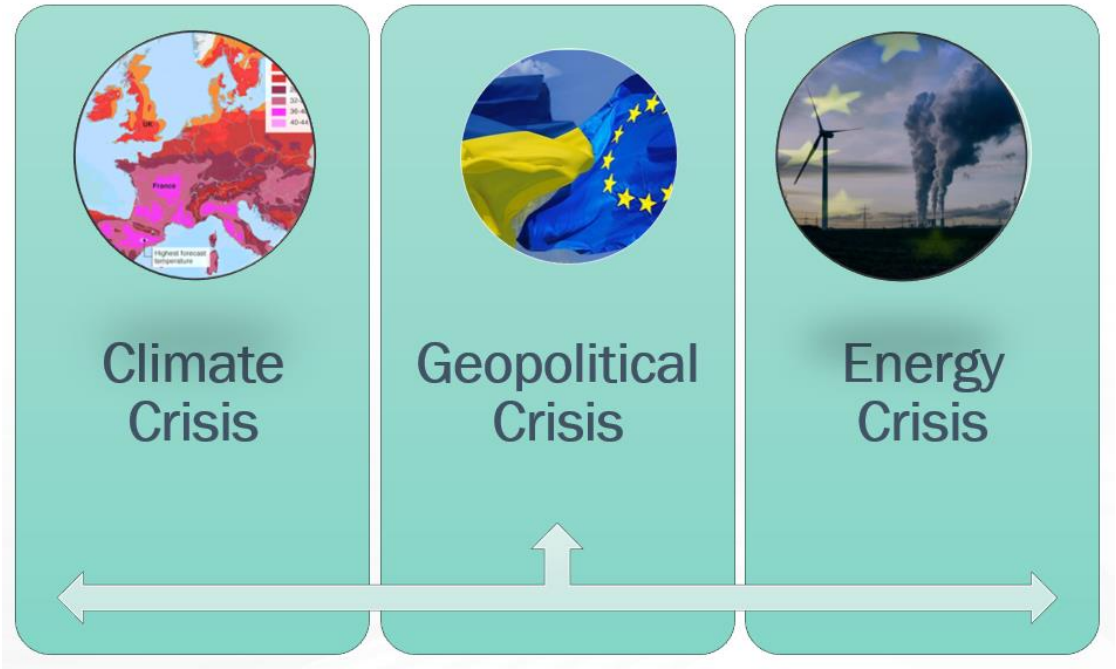

Figure 5-1 A Series of Crises

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. At a national level, the new Climate Action Plan 2024 (CAP 24) has been published since the adoption of the Clare County Development Plan 2023-2029. CAP 24 affirms the 2030 target of 9GW of onshore wind energy and emphasises the urgent need to accelerate the permitting and construction of wind energy projects. 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 Development 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 Development 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 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

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

renewable energy projects should be given priority when balancing legal interests in a given case – Article 3:

> 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 Development is directly supported through the REPowerEU framework. In this regard, the Proposed Development 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.

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.

[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)*

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 Development 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 Development 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 Development.

- **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 Development, 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 Development 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.

Draft Revised National Planning Framework

In July 2024, the Irish Government published the draft revision of the National Planning Framework (NPF) for public consultation. The Draft Revision of the NPF focuses on the need to update the Framework published in 2018 in order to appropriately reflect changes to Government policy that have taken place since the initial publication six years ago, such as climate transition.

There is an increased emphasis on the importance of the renewable energy development and infrastructure needed to support this. Chapter 9 acknowledges that the "**accelerated delivery of the additional renewable energy generation is... essential for Ireland to meet its climate targets**." A number of new or amended National Policy Objectives (NPOs) have been proposed in order to achieve this objective.

Table 9.1 sets regional renewable energy capacity allocations for wind and solar energy. This was one of the key actions for 2024 under the Climate Action Plan 2024. The Southern Region, in which the Proposed Development is located, is allocated an additional 978MW of wind energy. Under NPO 75, the Southern Regional Assembly will be required to plan how and where to deliver the required capacity by identifying capacity allocations for each Local Authority in its area. Clare County Council will then be required to plan for the delivery of the energy capacity target that they have been allocated, under NPO 76.

The introduction of renewable energy targets represents a more active and prescriptive approach to land use planning for renewable energy development. If adopted in the final version of the Revised NPF, it will align the national target of 9GW of onshore wind energy with the policies and objectives of Local Authorities.

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 Development 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 Development 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 Development, 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 Development 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 Southern Regional Spatial & Economic Strategy

The Southern Regional Spatial & Economic Strategy (RSES) came into effect on 31st January 2020. The RSES sets out a strategy to implement the NPF at a regional level. The RSES sets out a strategic vision which includes actions to mitigate against climate change. The RSES recognises the urgency to transition to a low carbon future, accelerate the transition towards low carbon economy and increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport and agriculture.

The RSES states the following in relation to wind energy: "*Wind energy is currently the largest contributor of renewable energy, and it has the potential to achieve between 11-16GW of onshore wind and 30GW of offshore wind by 2050 (SEAI, 2016). The sector can make a significant contribution to meeting national energy demands while attaining our energy and emissions targets for 2020 and beyond.*" The RSES includes a range of policy objectives which specifically supports the development of renewable energy projects such as the Proposed Development.

Supportive policies in relation to the Proposed Development are outlined below;

> ***RPO 50*** *It is an objective to further develop a diverse base of smart economic specialisms across the rural Region, including innovation and diversification in (among other things) renewable energy as a dynamic driver for the rural economy.*
>
> ***RPO 56*** *The RSES recognises the urgency to transition to a low carbon future and it is therefore an objective to accelerate the transition towards low carbon economy and circular economy through mechanisms such as the Climate Action Competitive Fund;*
>
> ***RPO 95*** *It is an objective to support implementation of the National Renewable Energy Action Plan (NREAP), and the Offshore Renewable Energy Plan and the implementation of mitigation measures outlined in their respective SEA and AA and leverage the Region as a leader and innovator in sustainable renewable energy generation.*
>
> ***RPO 99*** *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 development of the Proposed Development will aid in meeting the objectives set out in the RSES including diversification of the rural economy, actions against climate change and the sustainable development of wind energy at an appropriate location.

Table 5-1 EU, National & Regional Objective 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 Development , 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 Development 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 Development 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 Development 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 Development 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 Wind Farm, 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 Development 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 Development 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 Development supports the objectives to ensure the State's energy security. This Proposed Wind Farm will serve 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 Development is in compliance with the Regional Economic and Spatial Strategy which supports the development of renewable energy in the region.

5.4 Local Planning Policy

5.4.1 Clare County Development Plan 2023-2029

The Clare County Development Plan 2023-2029, ("CDP"), sets out an overall strategy for the proper planning and sustainable development of County Clare to 2029. The CDP 2023-2029 was adopted by the Elected Members of Clare County Council at a Special Meeting on 9th March 2023. The Plan came into effect 6 weeks from the date of adoption, on 20th April 2023. The CDP is the primary policy document for planning policy throughout the functional area of Clare County Council.

A final adopted Clare County Development Plan 2023-2029 is currently being prepared and graphically designed. In the interim period, an Interim Version of the Clare County Development Plan 2023-2029 is available.

The strategic vision of the CDP is underpinned by 18 no. key goals, the following goals are considered relevant in respect to the proposed development:

- **Goal I**: A county that is resilient to climate change, plans for and adapts to climate change and flood risk, is the national leader in renewable energy generation, facilitates a low carbon future, supports energy efficiency and conservation and enables the decarbonisation of our lifestyles and economy;

- **Goal VII**: A county with diverse and strong rural communities and economy, where its natural resources are sustainably managed in a manner that is compatible with the fragility of rural areas and the existing quality of life;

- **Goal IX**: A county that builds on the strategic location and natural resources of the Shannon Estuary by facilitating and maximising its potential for various forms of development while managing the estuarine and natural environment in full compliance with all relevant EU Directives; and

- **Goal XIX**: A county that manages and monitors the county level implementation of the National Planning Framework, Regional Spatial Economic Strategy, national plans and guidelines to ensure that quality of life, sustainability, climate action, resilience and inclusivity are the fundamental principles of the future sustainable development of the county.

The CDP acknowledges that the achievement of these above key goals will be dependent upon the Council's capacity to deliver a competitive and uninterrupted energy supply. As such, *energy efficiency*, *renewable energy development* and *progression towards a low carbon economy* are identified as central themes of this Plan.

Due to the '*favourable position*' of County Clare on the western seaboard, it highlighted that the County has significant potential to accommodate further electricity generating activity; specifically, significant potential to increase the production of electricity from renewable energy sources (e.g. wind). Having regard to the County's available renewable resources, the CDP states that Clare County Council will seek to take a '*lead role in respect of renewable energy technology'* to assist in meeting national, regional and County targets in energy consumption and CO_2 reduction. The following policies are considered relevant:

With regard to the above policies, the CDP states that Clare County Council will promote the implementation of the Clare County Renewable Energy Strategy (RES) and will facilitate the development of a range of sustainable forms of energy creation within the County in order to ensure a secure and effective supply of energy. Through the successful delivery of the Renewable Energy Strategy, the CDP states that Co. Clare can make significant advancements in energy security, reduced reliance on traditional fossil fuels, enabling future energy exports and meeting assigned targets.

The Development Plan clearly states that it is essential to ensure '*energy demands are met without compromising environmental quality*'. For example, the CDP notes that almost the entire County has either an excellent or very good wind energy resource. Notwithstanding, the development and siting of wind energy projects must be '*balanced with the potential impacts on the landscape, ecology and the amenities of local communities*'. In this regard, the CDP identifies areas that are considered suitable for commercial wind energy in their Wind Energy Strategy, as discussed later in this section.

In order to facilitate further renewable energy generation within the county, the CDP states that:

> *"A strong transmission grid is essential 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."*

The provision of a secure and adequate electricity transmission infrastructure, including the reinforcement and extension, where required, of the existing grid, will be a critical prerequisite for further investment within the Co. Clare renewable energy sector.

Table 5-2 below sets out the relevant policies and objectives within the CDP which currently support the continued investment in renewable/ wind energy generation in County Clare. A statement of consistency is included with regard to each policy. It is demonstrated through **Table 5-2** that the Proposed Development is in compliance with the policies and objectives of the CDP.

Table 5-2 Renewable Energy Policy – Clare County Development Plan 2023-2029

Policy Theme	Policy/ Objective	Compliance
Climate Action	**CDP2.1: Climate Action** It is an objective of Clare County Council: a) To support the implementation of the National Climate Action Plan 2023 and the National Climate Change Adaptation Framework (and any subsequent versions thereof), and to work with the Regional Climate Action Offices to enable County Clare to transition to a low carbon and climate resilient county; b) To adopt sustainable planning strategies through integrating land use and transportation and by facilitating mixed use developments as a means of supporting national targets of climate policy mitigation and adaptation objectives, and reducing our carbon footprint and greenhouse gas emissions; and; c) To raise awareness and understanding of the impacts of climate change on both the local economy and communities in the county, and the ways communities can increase their response and grow their resilience to these impacts.	The Proposed Development is in compliance with CDP2.1 Climate Action as it supports the implementation of the CAP and 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 Development will reduce the need for non-renewable sources like coal and oil, helping to transition toward cleaner energy usage in the county.
	CDP2.2: Climate Change Mitigation, Adaption and resilience It is an objective of the Clare County Council: a) To support the implementation of the Clare Climate Change Adaptation Strategy 2019-2024 (and any subsequent versions); b) To promote measures that build resilience to climate change to address impact reduction, adaptive capacity, awareness raising, providing for nature-based solutions and emergency planning; c) To raise awareness of issues relating to climate change and climate change adaptation during the lifetime of this plan;	The Proposed Development supports the implementation of the Clare *Climate Change Adaptation Strategy 2019-2024* in promoting measures that build resilience to climate change to address impact reduction, adaptive capacity, awareness raising, providing for nature-based solutions and emergency planning. By providing a potential installed capacity range from a minimum of 51.3 MW up to a maximum 64.8 MW, the Proposed Development of 9 no. wind turbines at Knockshanvo, Co. Clare supports renewable energy generation in the County and contributes to meeting the total renewable energy targets for Strategic Areas.

Policy Theme	Policy/ Objective	Compliance
	d) To liaise, collaborate and work in partnership with the relevant government approved sectors in relation to initiatives and activities across the county; e) To support the Ennis 2040 Spatial and Economic Strategy and its aspiration for Ennis to become Irelands first climate adaptive town; and f) To facilitate and support the relevant stakeholders and enterprises in the progression of advancements in climate adaptation solutions and renewable energy generation and technologies.	The Proposed Development will contribute to the progression of advancements in climate adaptation solutions and renewable energy generation and technologies in Co. Clare.
	CDP2.14 Transition to a Low Carbon Economy and Society It is an objective of Clare County Council: a) To facilitate measures which will accelerate the transition to a low carbon economy and a circular economy through mechanisms such as the Climate Action Competitive Fund; b) To support the development of enterprises that create and employ green technologies and to promote County Clare as a low carbon county as a means of attracting inward investment to the county and to the wider Southern Region; c) To support the Ennis 2040 Strategic Objective to establish Ennis as Ireland's first climate adaptive town; d) To support and facilitate the implementation of the Clare Climate Change Adaptation Strategy 2019-2024; e) To ensure that the development of green industry and technologies incorporates careful consideration of potential environmental impacts at project level including the capacity of the receiving environment and existing infrastructure to serve these new industries. f) To facilitate the development of energy sources which will achieve low carbon output.	By supplying sustainable renewable energy, the Proposed Development will reduce the need for non-renewable sources like coal and oil, helping to transition toward a low carbon economy and cleaner energy usage in the county. By providing up to a maximum 64.8 MW of energy, the Proposed Wind Farm of 9 no. wind turbines at Knockshanvo, Co. Clare supports the implementation of the provisions of Ireland's Transition to a Low Carbon Energy Future 2015-2030 through renewable energy generation in the County.

Policy Theme	Policy/ Objective	Compliance
	g) To support sustainable modes of transport such as walking and cycling through promotional strategies and the provision of active travel infrastructure where required; h) To work to implement the provisions of Ireland's Transition to a Low Carbon Energy Future 2015-2030 as they relate to County Clare; i) To require the submission of an Energy Efficiency and Climate Change Adaptation Design Statements for large scale commercial and residential applications; j) To promote climate change issues across business, public and residential sectors and to target measures and support initiatives to achieve reduced greenhouse gas 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; k) To support investments in the energy efficiency of existing commercial and public building stock with a target of all public buildings and at least one-third of total commercial premises upgraded to BER Rating 'B'; and l) To report annually on energy usage in all public buildings and to achieve a target of 33% improvement in energy efficiency in all buildings in accordance with the National Energy Efficiency Action Plan (NEEAP)	
Renewable Energy	**CDP 11.47: Renewable Energy** It is an objective of Clare County Council the Development Plan: a) To encourage and to favourably consider proposals for renewable energy developments, including community owned developments, and ancillary facilities in order to meet National, Regional and County renewable energy targets, and to facilitate a reduction in CO2 emissions and the promotion of a low carbon economy;	As a renewable energy project that directly contributes to the achievement of a crucial national climate target, the Proposed Wind Farm contributes directly to this objective and therefore should be favourably considered by An Bord Pleanála. The Proposed Wind Farm turbines are wholly located within an area designated primarily as a 'Strategic Area' and also partially within an area which is designated as 'Acceptable in Principle'. Both areas are considered suitable for wind energy development as outlined in the Clare Wind Energy Strategy.

Policy Theme	Policy/ Objective	Compliance
	b) To assess future renewable energy-related development proposals having regard to the Clare Renewable Energy Strategy 2023-2030 in Volume 5 of this plan and associated SEA and AA; c) To support the sustainable development of renewable wind energy (on-shore and offshore) at appropriate locations and of its related grid infrastructure in County Clare, in accordance with all relevant policies, guidance and guidelines pertaining to the protection of the environment and protected habitats and species, and to assess proposals having regard to the Clare Wind Energy Strategy in Volume 6 of this plan and the associated SEA and AA, or any subsequent updated adopted Strategy and to national Wind Energy Guidelines; d) To prepare a new and updated Wind Energy Strategy for County Clare during the lifetime of this plan, subject to the publication of the update to the Wind Energy Development Guidelines for Planning Authorities 2006; e) To strike an appropriate balance between facilitating renewable and wind energy-related development and protecting the residential amenities of neighbouring properties; f) To support and facilitate the development of new options and technological advances in relation to renewable energy production and storage, that may emerge over the lifetime of this Plan; g) To support the integration of indigenous renewable energy production and grid injection; h) To ensure that all proposals for renewable energy developments and ancillary facilities in the County are in full compliance with the requirements of the SEA and Habitats Directives and Objective CDP3.3 of this plan; and To promote and market the County as a leader of renewable energy provision.	The Proposed Development will contribute over 50MW to the Clare Wind Energy Strategy for Strategic Areas and for Acceptable in Principle areas (totalling 550MW of renewable wind energy by 2030). The design and layout of the Proposed Development follows the recommendations and guidelines set out in the '*Wind Energy Development Guidelines'* (Department of the Environment, Heritage, and Local Government, 2006), the '*Draft Wind Energy Guidelines* ', ('WEGs') (Department of the Environment, Heritage and Local Government, 2019), and the '*Best Practice Guidelines for the Irish Wind Energy Industry*' (Irish Wind Energy Association, 2008). Through support of this Proposed Development, Clare County Council will be fulfilling their objective CDP11.47 'Renewable Energy' to *'favourably consider proposals for renewable energy developments, including community owned developments, and ancillary facilities in order to meet National, Regional and County renewable energy targets, and to facilitate a reduction in CO2 emissions and the promotion of a low carbon economy.'*

Policy Theme	Policy/ Objective	Compliance
	CDP 6.17: Energy Supply It is an objective of Clare County Council: a) To contribute to the economic development and enhanced employment opportunities in the county by: b) Enabling the development of a self sustaining, secure, reliable and efficient renewable energy supply and storage for the County in line with CDP Objective 3.3; c) Facilitating the county to become a leader in the production of sustainable and renewable energy for national and international consumption through research, technology development and innovation; and d) Supporting on-land and off-shore renewable energy production by a range of appropriate technologies in line with CDP Objective 3.3.	The Proposed Development will contribute to the development of a self-sustaining, secure, reliable and efficient renewable energy supply and storage for the County by contributing 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.
	CDP 8.12: Renewable Energy Development It is an objective of Clare County Council: To support the implementation of the National Renewable Energy Action Plan (NREAP), the Clare Wind Energy Strategy and the Clare Renewable Energy Strategy to facilitate the development of renewable energy developments in rural areas to meet national objectives towards achieving a low carbon economy by 2050 subject to the requirement of the RES SEA Environmental Report and the mitigation measures arising from the CDP Appropriate Assessment as contained in Volume 10(a)	The Proposed Development will support the development of the National Renewable Energy Action Plan (NREAP), the Clare Wind Energy Strategy and the Clare Renewable Energy Strategy though the production of renewable energy thereby aiding the shift towards a low carbon economy.
	CDP 11.44: Energy Security It is an objective of Clare County Council the Development Plan:	Projects such as the Proposed Development are a critical component in decoupling the county from reliance on fossil fuels.

Policy Theme	Policy/ Objective	Compliance
	To promote and facilitate the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure, to integrate renewable energy sources, thereby creating a secure and efficient energy supply and storage system for County Clare which is ready to meet increased demand as the regional economy grows.	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 CDP 11.44 'Energy Security' emphasizing a transition away from traditional non-renewable fuels in the energy sector.
	CDP 11.45: Electricity Networks It is an objective of Clare County Council: a) To facilitate improvements in energy infrastructure and encourage the expansion of the infrastructure within the county; b) To facilitate future alternative renewable energy developments and associated utility infrastructure throughout the county; c) To support the Integrated Single Electricity Market (ISEM) as a key priority for the Southern Region and the sustainable development and reinforcement of the energy grid including grid connections, transboundary networks to and through County Clare subject to appropriate environmental assessment and planning processes; d) To collaborate with EirGrid to facilitate the development of a safe, secure and reliable supply of electricity, enhanced electricity networks and new transmission infrastructure projects that might be brought forward in the lifetime of this Plan under EirGrid's (2017) Grid Development Strategy (subject to appropriate environmental assessment and the planning process); e) To collaborate with EirGrid over the lifetime of the plan to ensure that the county's minimum target of 1,167MW of renewable energy generation is achieved and can be accommodated on the electricity network in County Clare; and	The Proposed Development will include 110kV infrastructure to facilitate the connection and distribution of the renewable energy generated by the Proposed Wind Farm thereby supporting improvements in energy infrastructure and encouraging the expansion of the infrastructure within the County.

Policy Theme	Policy/ Objective	Compliance
	f) To have regard to environmental and visual considerations in the assessment of developments of this nature and ensure compliance with the environmental requirements of objective CDP 3.3 of this plan.	
	CDP 11.48: Renewable Energy Strategy It is an objective of Clare County Council: a) To support implementation of the National Renewable Energy Action Plan (NREAP), and the Offshore Renewable Energy Plan including mitigation measures outlined in their respective SEA and AA and promote County Clare and the Southern Region as a leader and innovator in sustainable renewable energy generation; b) To support the implementation of the Clare Renewable Energy Strategy 2023-2029 in Volume 5 of this plan; and c) To support the development of a Regional Renewable Energy Strategy with relevant stakeholders	The Proposed Development is supported by the policies and objectives of the NREAP. The Proposed Wind Farm is compliant with the policies and objectives of the Renewable Energy Strategy (RES). Compliance with the RES is discussed in further detail in Section 5.4.1.1 below.
	CDP6.18 Green Technology To support the development of low carbon and green tech businesses and industries throughout the County.	The Proposed Development is a green technology, contributing to a sustainable, low-carbon future.
Flood Risk Management	**CDP2.6: Flood Risk Assessment and Management** It is an objective of Clare County Council: a) To ensure development proposals have regard to the requirements of the SFRA and Flood Risk Management Guidelines; and where required are supported by an appropriately detailed hydrological assessment / flood risk assessment.	A Flood Risk Assessment (FRA) is included as Appendix 9-1 of the EIAR. As outlined within the FRA, the assessment had regard to *'The Planning System and Flood Risk Management Guidelines for Planning Authorities'*. The FRA includes an assessment of historical mapping, fluvial maps, OPW past flooding events, GSI Historic Surface Water Flood Mapping, CFRAM mapping, OPW National Indicative Fluvial Flooding, Groundwater Flooding, Coastal Flooding and flooding resulting from climate change.

Policy Theme	Policy/ Objective	Compliance
	b) To ensure that flood risk assessments include consideration of potential impacts of flooding arising from climate change including sea level rise and coastal erosion; c) To integrate sustainable water management solutions, prioritising nature based solutions (such as SUDS, nonporous surfacing and green roofs) into development proposals; d) To include Natural Water Retention Measures (NWRMS) where appropriate in consultation with the Office of Public Works (OPW) and other relevant stakeholders: e) To support investment in the sustainable development of capital works under the Flood Capital Investment Programme and Flood Risk Management Plans developed under the Catchment Flood Risk Assessment and Management (CFRAM) process; and f) To ensure that potential future flood information obtained/generated through the Development Management process is used to inform suitable adaptation requirements in line with the Guidelines for Planning Authorities on Flood Risk Management (DoECLG & OPW, 2009)	Appendix 9-3 of Chapter 9, the Water Framework Directive Assessment outlines the general principal of the sustainable drainage system (SuDs) drainage controls available for the management of surface waters. Table M of EIAR Appendix 9-3 includes a summary of drainage mitigation measures and their application. As identified within Chapter 2: Background of the EIAR, the OPW was contacted as part of the scoping exercise, however no response was received. Drainage measures, as presented in Chapter 9 of the EIAR and its appendices have followed best practice measures.
	CDP 2.12: Flood Risk Management, Green Infrastructure & Biodiversity It is an objective of Clare County Council: a) To facilitate and implement green infrastructure developments as a means of managing flood risk and enhancing the natural environment in the plan area in compliance with Objective CDP 3.1; and b) To avail of opportunities to enhance biodiversity and amenity and to ensure the protection of environmentally sensitive sites and habitats where flood risk management measures are planned subject to the requirements of the Habitats Directive.	The EIAR includes for a Flood Risk Assessment and Biodiversity Management and Enhancement Plan which allow for the enhancement of biodiversity, protection of sensitive areas and a full assessment of the potential for flooding relating to the Proposed Development, showing full compliance with CDP 2.12.
Biodiversity	**CDP15.1 Biodiversity**	The Proposed Development takes into consideration the importance of the local biodiversity to make sure it is retained during the construction, operation and decommissioning phases of the Proposed

Policy Theme	Policy/ Objective	Compliance
	It is an objective of Clare County Council: a) To implement the National Biodiversity Action Plan 2017- 2021, the All Ireland Pollinator Plan 2021-2025, the EU A Farm to Fork Strategy 2020, the County Clare Heritage Plan 2017-2023 and the County Clare Biodiversity Plan 2017- 2023, or any subsequent plans, in partnership with all relevant stakeholders; b) To review the Clare County Heritage Plan 2017-2023 and to prepare a new plan, which will be set within the context of the National Heritage Plan "Heritage Ireland 2030", upon the expiry of the existing adopted Plan; c) To support National Biodiversity Week and events such as Bioblitz in order to increase awareness of biodiversity and its benefits to the community; d) To ensure that features of importance to local biodiversity are retained as part of developments and projects being undertaken in the County; e) To identify ecological buffer zones, where appropriate, in the Plan area; and f) To support current and future projects with the aim of restoration/ rehabilitation of natural habitats and species.	Development. The Biodiversity Management and enhancement measures outlined in the Biodiversity Management Plan included at Appendix 6-5 will ensure that there will be no residual net loss of habitats as a result of the Proposed Development.
	CDP 3.3: Appropriate Assessment, Strategic Environmental Assessment and Strategic Flood Risk Assessment It is an objective of the Clare County Council: a) To require compliance with the objectives and requirements of the Habitats Directive, specifically Article 6(3) and where necessary 6(4), Birds, Water Framework, and all other relevant EU Directives and all relevant transposing national legislation; b) To require project planning to be fully informed by ecological and environmental constraints at the earliest stage of project development	The Proposed Development will comply with the objectives and requirement of the Habitats Directive, specifically Article 6(3) and where necessary 6(4), Birds, Water Framework, and all other relevant EU Directives and all relevant transposing national legislation. The application for the Proposed Development includes an Ecological Impact Assessment, included as Chapter 6 of the EIAR and NIS including the necessary assessments to ensure that there is 'no net loss' of biodiversity and to ensure that all European sites and Natural Heritage Areas are appropriately protected.

Policy Theme	Policy/ Objective	Compliance
	and any necessary assessment to be undertaken, including assessments of disturbance to species, where required together with the preparation of both statutory and non-Statutory Ecological Impact Assessments (EcIA); c) To protect, manage and enhance ecological connectivity and improve the coherence of the Natura 2000 Network; d) To require all proposals to ensure there is 'no net loss' of biodiversity within developments; e) To ensure that European sites and Natural Heritage Areas (designated proposed NHAs) are appropriately protected; To require the preparation and assessment of all plans and projects to have regard to the information, data and requirements of the Appropriate Assessment Natura Impact Report, SEA Environmental Report and Strategic Flood Risk Assessment Report contained in Volume 10 of this development plan; and f) to require compliance with the objectives of the Water Framework Directive and support the implementation of the 3rd Cycle River Basin Management Plan (and any other iteration during the lifetime of the plan).	
	CDP15.3 European Sites It is an objective of Clare County Council: a) To afford the highest level of protection to all designated European sites in accordance with the relevant Directives and legislation on such matters; b) To require all planning applications for development that may have (or cannot rule out) likely significant effects on European Sites in view of the site's Conservation Objectives, either in isolation or in combination with other plans or projects, to submit a Natura Impact Statement in accordance with the	The Proposed Development recognises the importance of European Sites in accordance with the relevant Directives and legislation. An NIS is submitted as part of the planning application in accordance with the requirements of the EU Habitats Directive and the Planning and Development Act, 2000 (as amended). The NIS concludes that the Proposed Development individually or in-combination with other plans or projects, will not adversely affect the integrity of any designated European sites.

Policy Theme	Policy/ Objective	Compliance
	requirements of the EU Habitats Directive and the Planning and Development Act, 2000 (as amended); and c) To recognise and afford appropriate protection to any new or modified SPAs or SACs that are identified during the lifetime of this Development Plan through the planning application process bearing in mind proposals for development outside of a European site may also have an indirect effect.	
	CDP15.4: Requirement for Appropriate Assessment It is an objective of Clare County Council: a) To implement Article 6(3) and where necessary 6(4) of the Habitats Directive and to ensure that Appropriate Assessment is carried out in relation to works, plans and projects likely to impact on European sites (SACs and SPAs), whether directly or indirectly or in combination with any other plan(s) or project(s); and b) To have regard to Appropriate Assessment of Plans and Projects in Ireland – Guidelines for Planning Authorities 2009 or any updated version.	Appropriate Assessment has been carried out in relation to the works likely to impact the European sites (SACs and SPAs), whether directly, indirectly or in combination with any plans or projects.
	CDP15.5: Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs) It is an objective of Clare County Council: a) To actively promote the conservation and protection of areas designated as NHA's (including proposed sites) and to only consider proposals for development within or affecting an NHA where it can be clearly demonstrated that the proposed development will not have a significant adverse effect on the NHA or pNHA; and b) To identify and afford appropriate protection to any new, proposed or modified NHA's identified during the lifetime of the Development Plan;	Chapter 6 of the EIAR provides a full assessment of any potential impacts from the construction operational and decommissioning phases on all NHAs and pNHAs within 20km of the proposed turbine locations. No negative effects have been identified, thus the Proposed Development is in full compliance with CDP 15.5.

Policy Theme	Policy/ Objective	Compliance
	CDP15.10: Environmental Impact Assessment It is an objective of the Development Plan: a) To implement the EIA Directive, ensuring that all elements/stages or components of the project are included in one overall assessment and all reasonable alternatives are taken into consideration in choosing the option with the least environmental impact; b) To have regard to "Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessments (2018) when considering proposals for which an EIA is required; and c) To ensure full compliance with the requirements of the EU Habitats Directive, SEA Directive and associated legislation/regulations, including the associated European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011), European Communities (Environmental Assessment of Certain Plans and Programmes) regulations 2004-2011, and the European Communities (Environmental Impact Assessment) Regulations 1989 – 2011 (or any updated/superseding legislation).	As set out in Chapter 1: Introduction of the EIAR, and as reinforced throughout the various sections of the document, the EIAR has been prepared in compliance with EIA Directive. Chapter 3 of the EIAR sets out all reasonable alternatives that were assessed as part of the design process of the Proposed Development, ensuring that the final development footprint is the most environmentally prudent version of what it could be. The EIAR has had full regard to all relevant Guidelines, including Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessments (2018), the EU Habitats Directive, SEA Directive and associated legislation/regulations, including the associated European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011), European Communities (Environmental Assessment of Certain Plans and Programmes) regulations 2004-2011, and the European Communities (Environmental Impact Assessment) Regulations 1989 – 2011 (or any updated/superseding legislation).
	CDP15.12: Biodiversity and Habitat Protection It is an objective of Clare County Council: a) To protect and promote the sustainable management of the natural heritage, flora and fauna of the County both within protected areas and in the general landscape through the promotion of biodiversity, the conservation of natural habitats, the enhancement of new and existing habitats, and through the integration of Green Infrastructure (GI), Blue Infrastructure and ecosystem services including landscape, heritage,	Chapter 6: Biodiversity (Flora and Fauna) of the EIAR presents an assessment of all habitats present within the Proposed Development site boundary, and those of EU importance located within the Zone of Influence (i.e. the within the EIAR Site Boundary, those in proximity to the EIAR Site Boundary, and those with hydrological connectivity), and also demonstrates the avoidance of the Proposed Wind Farm relating to these sensitive habitats. A Biodiversity Management Plan is in place as part of the Proposed Development. This Plan sets out measures to plant 1.7km of hedgerow/treeline habitat and replanting

Policy Theme	Policy/ Objective	Compliance
	biodiversity and management of invasive and alien species into the Development Plan; b) To promote the conservation of biodiversity through the protection of sites of biodiversity importance and wildlife corridors, both within and between the designated sites and the wider Plan area; c) To support the implementation of the All Ireland Pollinator Plan, National Biodiversity Action Plan and National Raised Bog SAC Management Plan; d) To ensure there is no net loss of potential Lesser Horseshoe Bat feeding habitats, treelines and hedgerows within 2.5km of known roosts; e) To implement and monitor the actions as set out in the Clare County Biodiversity Plan; and To promote biodiversity net gain in any new plans/projects/policies to promote development that leaves biodiversity in a better state than before	of 0.9ha of oak-ash hazel woodland within the Proposed Development Site. The Biodiversity Management Plan also includes for the reversion of forestry within the EIAR Site Boundary to peatland which will link up existing areas of wet heath and upland blanket bog and result in a net gain in peatland habitat. The measures proposed in the Biodiversity Management Plan will provide benefits for both hen harrier and lesser horseshoe bat. Please refer to Appendix 6-5 of the EIAR for further details.
	CDP15.14 Habitat Fragmentation and Green Infrastructure Corridors It is an objective of Clare County Council: a) To ensure that development proposals support and enhance the connectivity and integrity of habitats in the Plan area by incorporating natural features into the design of development proposals. To ensure that the potential impacts upon the migratory routes of fauna including birds and bats and the movement of species between European Sites are fully considered within the relevant ecological assessment. These assessments shall fully consider flight collision risks, habitat fragmentation and barrier risk as required.	Appendix 6-4 Biodiversity Management and Enhancement Plan (BMEP) of the EIAR aims to promote biodiversity within the local area of the Proposed Wind Farm. Appendix 6-4 includes details on the planting of hedgerows and treelines within the Proposed Development which will ensure that no net loss of these habitats is experienced, and that the connectivity of existing sensitive habitats is maintained. The potential impact of the Proposed Development on migratory routes of fauna, including bats and birds, are assessed in Chapter 6 - Biodiversity and Chapter 7 – Ornithology and in the NIS.
	CDP15.19 Woodlands, Trees and Hedgerows	As detailed in Chapter 3: Consideration of Alternatives of the EIAR, the Proposed Development layout was designed on a constraints-led

Policy Theme	Policy/ Objective	Compliance
	It is an objective of Clare County Council: a) To preserve and conserve individual or groups of trees identified in Volume 2 of this Plan as 'Trees for Preservation' which will enhance the character and appearance of an area; b) To carry out tree survey work during the lifetime of this Plan to identify future trees of importance in the County and facilitate their future protection; c) To protect individual or groups of trees within the Plan area which are important for environmental, recreational, historical, biodiversity and/or aesthetic reasons or by reason of contribution to sense of place, including groups of trees which correspond with protected habitats, or which support protected species, under the Habitats Directive; d) To work with landowners, local communities and other relevant groups to promote the retention and conservation of existing trees and hedgerows and encourage development proposals that enhance the landscape through positive management and additional planting/sensitive replanting of native tree species; e) To protect woodlands and hedgerows from damage and/or degradation and to prevent disruption of the connectivity of woodlands and hedgerows of the County; f) To ensure, where required, applications for development include proposals for planting / leave a suitable ecological buffer zone, between the development works and areas/features of ecological importance; g) Where hedgerows are required to be removed in the interests of traffic safety or where breaches to hedgerows occur due to river drainage/maintenance works and flood repair, to require the applicant/developer to reinstate the hedgerows with a suitable replacement of native species to the satisfaction of the Council; h) To require each green space in new residential developments to have at least one native oak tree, or other naturalised tree species of similar	basis. Chapter 6 and its appendices of the EIAR also details the surveys carried out on the Proposed Development site. There will be no net loss of habitats as a result of the Proposed Development. As detailed within the EIAR, a felling licence will be applied for before any felling works take place. Forestry to be felled to accommodate the Proposed Development is all commercial forestry. Commercial forestry felled in order to facilitate the Proposed Development will be replanted offsite. Hedgerow removal will take place however hedgerows will be replaced within biodiversity enhancement areas.

Policy Theme	Policy/ Objective	Compliance
	stature and lifespan, integrated into the agreed planting/landscaping scheme; and To require, where possible, that all trees felled as a result of development proposals be replaced at a minimum ratio of 10 new native species per 1 tree felled.	
Landscape	**CDP 14.3 Settled Landscape** It is an objective of Clare County Council: a) To permit development in these areas that will sustain economic activity, and enhance social well-being and quality of life - subject to conformity with all other relevant provisions of the Plan and the availability and protection of resources; b) To ensure that selection of appropriate sites in the first instance within this landscape, together with consideration of the details of siting and design, are directed towards minimising visual impact; c) To ensure that particular regard should be had to avoiding intrusions on scenic routes and on ridges or shorelines. Developments in these areas will be required to demonstrate: i. i. That the site has been selected to avoid visual prominence ii. That site layouts avail of existing topography and vegetation to reduce visibility from scenic routes, walking trails, public amenities and roads iii. That design of buildings and structures reduces visual impact through careful choice of form, finishes and colours and that any site works seek to reduce the visual impact of the development.	The Proposed Development is located in the Western Corridor Working Landscape are described as areas that contain pockets of concentrated development or a unique natural resource. In relation to Scenic Routes, the CDP notes that there is a need to protect and conserve views adjoining public roads throughout the county where views are of high amenity value, however it notes that it is not proposed that this should give rise to the prohibition of development along these routes but that development, where permitted, should not seriously hinder or obstruct these views and should be designed to minimise visual impact. The Proposed Development has been designed with regard for the designated Scenic Routes in the area. The impact of the Proposed Development on Scenic Routes are fully assessed in the Chapter 13 - Landscape and Visual of the EIAR.

Policy Theme	Policy/ Objective	Compliance
	CDP14.7 Scenic Routes It is an objective of Clare County Council: a) To protect sensitive areas from inappropriate development while providing for development and change that will benefit the rural community; b) To ensure that proposed developments take into consideration their effects on views from the public road towards scenic features or areas and are designed and located to minimise their impact; and c) To ensure that appropriate standards of location, siting, design, finishing and landscaping are achieved.	The Proposed Development takes into consideration the effects on views from public roads The Proposed Development acknowledges the impact on views from public roads and is strategically positioned to reduce this effect, as illustrated in the photomontage booklet included in Volume 2 of the EIAR that supports the Proposed Development.
Archaeology	**CDP16.1: Archaeology Heritage** It is an objective of Clare County Council: a) To ensure the protection of the architectural heritage of County Clare through the identification of Protected Structures, the designation of Architectural Conservation Areas, the safeguarding of historic gardens, and the recognition of structures and elements that contribute positively to the vernacular and industrial heritage of the county; and b) To ensure that the archaeological and architectural heritage of the county is not damaged either through direct destruction or by unsympathetic developments. c) To support and promote architectural vernacular skills training and facilities in the county	A robust archaeological assessment is provided in Chapter 13 of the EIAR. The Proposed Wind Farm has also been designed with consideration for the recorded monuments of the area. Where potential effects have been identified appropriate mitigation measures have been proposed in order to minimise any such effects. Chapter 13 of the EIAR provides a full assessment of the direct and indirect effects of the Proposed Development on the archaeological and architectural heritage within the study area (i.e. 25km from the proposed turbine locations). This assessment includes a visual assessment of the Proposed Development in relation to monuments/areas of archaeological and architectural heritage.
	CDP16.2: Protected Structures It is an objective of Clare County Council:	No Protected Structures subject to statutory protection are located within the Proposed Wind Farm Site therefore no potential direct effects to this resource are identified. Similarly, No protected Structures

Policy Theme	Policy/ Objective	Compliance
	a) To protect, as set out in the Record of Protected Structures, all structures, which are of special architectural, historical, archaeological, artistic, cultural, scientific, social, or technical interest; and b) To review the Record of Protected Structures periodically and add structures of special interest as appropriate, including significant elements of industrial, maritime or vernacular heritage and any twentieth century structures of merit.	subject to statutory protection are along the proposed Grid Connection route therefore no direct effects to this resource are identified .No Protected Structures are located in the proposed works areas or within the proposed temporary transition compound along the TDR. A Protected Structure, Court country house, (Ref. 291) is situated c. 327m to the north-west but will not be directly impacted by ground works associated with the temporary transition compound. An entrance gateway and associated stone piers associated with the protected structure are located a short distance to the west of the proposed temporary transition compound. No works to the entrance or piers are proposed therefore no direct effects to same are identified. The Proposed Development is therefore in compliance with CDP 16.2: Protected Structures.
	CDP16.8 Sites, Features and Objects of Archaeological Interest It is an objective of Clare County Council: a) To safeguard sites, features and objects of archaeological interest generally; b) To secure the preservation (i.e. preservation in situ or in exceptional cases preservation by record) of all archaeological monuments included in the Record of Monuments and Places as established under Section 12 of the National Monuments (Amendment) Act, 1994, and of sites, features and objects of archaeological and historical interest generally; c) In securing such preservation, to have regard to the advice and recommendations of the Department of the Culture, Heritage and the Gaeltacht;	Chapter 13 of the EIAR presents an assessment of the cultural heritage features (including National Monuments, Protected Structures, those on the National Inventory of Architectural Heritage (NIAH)) and the potential impacts of the ProposedDevelopment on these monuments. The EIAR concludes that '*No direct effects to the recorded archaeological resource* [of the area] *are identified.*' The Cultural Heritage assessment goes on to state that *'Where potential impacts have been identified, such as to potential sub-surface archaeology, appropriate mitigation measures have been proposed in order to minimise any such impacts.* Where relevant mitigation measures have been identified, they will be implemented during the construction, operation and decommissioning phases of the Proposed Development in full.

Policy Theme	Policy/ Objective	Compliance
	d) To have regard to the government publication Framework and Principles for the Protection of the Archaeological Heritage 1999 in relation to protecting sites, features and objects of archaeological interest; and e) To advocate for greater financial assistance for the maintenance and improvement of features of archaeological interests in County Clare.	The Cultural Heritage Chapter of the EIAR has had full regard, and is in compliance with the Record of Monuments and Places, Section 12 of the National Monuments (Amendment) Act, 1994, recommendations of the Department of the Culture, Heritage and the Gaeltacht, Principles for the Protection of the Archaeological Heritage 1999.

5.4.1.1 Clare Renewable Energy Strategy

As reflected within the key goals of the CDP, Clare County Council wants to ensure that Co. Clare has the necessary land use and strategy framework in place to maximise the harnessing and use of its renewable energy resources and inform and guide the planning process for future renewable energy development. The Clare Renewable Energy Strategy 2023-2029 (RES) was adopted as part of the CDP 2023 – 2029, includes the following vision of the RES:

> *"A County Clare that is the national leader in renewable energy generation which supports energy efficiency and conservation, and which achieves balanced social and economic development throughout the County and assists in achieving national climate change mitigation targets."*

This Vision is underpinned by several strategic aims of which the following are considered to be of particular relevance to the Proposed Development:

a) A) To support the attainment of and to exceed in County Clare, where possible, the National targets and commitments to renewable energy;

b) B) To identify/highlight the opportunities for various renewable energy technologies and resources and identify broad areas suitable for their development in full compliance with the requirements of all environmental legislation including the requirements of the Strategic Environmental Assessment Directive, Habitats Directive and Water Framework Directive;

c) D) To maximise the opportunities for renewable energy development whilst safeguarding the environment and existing residential amenities; and

d) E) To safeguard, where appropriate, areas with potential for renewable energy projects and to guide renewable energy development to preferred locations.

The RES acknowledges that Co. Clare has the natural resources needed to maximise energy generation by renewable means: geographical location on the Shannon Estuary and its Atlantic coastline, strong wind resource, undulating topography and a significant grid network. These attributes present opportunities for both on-shore and off-shore wind, wave and tidal energy, and pumped freshwater hydro energy storage. The RES notes that "*energy needs in County Clare are expected to rise by 2020…*" which is balanced against a recognition that "*the County has considerable capacity to produce energy from renewable and indigenous resources*". In this regard, **Policy RES 2.1** states that "*it is an objective of Clare County Council to meet the County's energy needs from 100% indigenous renewable energy sources.*"

The RES sets out a sustainable balance of renewable energy resources up to 2023 which ensures that there is no over reliance or over concentration on any single technology. With regard to wind energy, a target of ***550MW*** has been identified. It should be noted, however, that this target is not a 'cap' and will not limit the potential for greater generation of renewable energy if exceeded.

- ***Objective RES 3.1*** *(Renewable Energy Targets): To facilitate the achievement of (or to exceed where possible) the renewable energy targets set out in Table 3.2 by 2030, ensuring that County Clare is the national leader in sustainable renewable energy generation, supporting energy efficiency, security and conservation, achieving balanced social, environmental and economic development throughout the County and assisting in the achievement of Ireland's Green Energy target.*

5.4.1.2 Clare Wind Energy Strategy 2023-2029

The Interim Wind Energy Strategy (WES) for County Clare was published in April 2023 and is incorporated into the CDP as Volume 6. The WES has been developed as a planning framework to support the implementation of wind developments in the county.

Within the preface of the WES it states:

> *The Clare Wind Energy Strategy forms part of the Clare County Development Plan 2023-2029. In accordance with the requirements of the Department of Environment, Community and Local Government as set out in Circular PL20-13, the previous "Clare Wind Energy Strategy 2017-2023" has not been reviewed as part of the preparation of this draft plan*
>
> *Circular PL20-13, dated 20th December 2013, in the cyclical review of a Development Plan it is advised that, until the national policy review processes have concluded in relation to the Wind Energy Development Guidelines and the Renewable energy Export Policy and Development Framework, local authorities should defer amending their existing Development Plan policies and should instead operate their existing Development Plan policies and objectives until the completion of these processes and further advice is issued."*

The WES highlights 11 Strategic objectives that outline the overall rationale behind the strategy, with the aim of contributing to national legally binding targets while also capitalising on those opportunities associated with the generation and harnessing of wind energy in a sustainable matter. A key objective being:

> *"To promote economic development through wind energy and other renewables in the County, underpinning the need for energy security, the promotion and establishment of a low carbon economy and the development of green business within the County."*

The WES also includes wind energy planning policy and development management standards to manage wind energy development. Strategic policy objectives for the development of the Wind Energy sector set out within the strategy are detailed in **Table 5-3** below.

Table 5-3 Strategic policy objectives for the development of wind energy- Clare Wind Energy Strategy

General Objectives	Description	Proposed Development Compliance
WES One: Development of Renewable Energy Generation	It is the objective of the Council to support, in principle and in appropriate scales and locations, the development of wind energy resources in County Clare. It is an objective of the Council to ensure the security of energy supply by accommodating the development of wind energy resources in appropriate areas and at appropriate scales within the County.	The Proposed Wind Farm turbines are located within an area designated primarily as a *'Strategic Area'* and also partially within an area which is designated as *'Acceptable in Principle'*. Both areas are considered suitable for wind energy development as outlined in the WES. The Proposed Development will support the Council in achieving its objective to ensure the security of energy supply by accommodating the development of wind energy resources.
WES Two: Development of Low Carbon Economy	County Clare will seek to promote itself as moving towards becoming a low carbon County as a means of attracting inward investment to the County and the wider Mid-West region.	The Proposed Development will support County Clare in towards becoming a low carbon County as it will contribute over 50MW of renewable wind energy generation to County Clare's Wind Energy targets.
WES Three: County Partnership Approach	Clare County Council will seek to promote wind energy in appropriate sites in the County and will work with agencies such as the Clare County Development Board, Clare Enterprise Board, Limerick Clare Energy Agency, Shannon Development, I.D.A and Enterprise Ireland to encourage investment in research and technology associated with wind farms and other renewable energy technology.	Projects such as the Proposed Development support Co. Clare in encouraging investment in research and technology associated with wind farms and other renewable energy technology. By generating renewable energy, wind farms such as the Proposed Development contribute to achieving the long-term goal of replacing fossil fuels with sustainable energy sources.

WES Four: Response to National Policy	The White Paper on Energy has set a target of 40% of electricity to be generated from renewable sources by 2020. In the Mid-West Regional Climate Change Strategy, County Clare is identified as having a potential 600MW energy produced from renewables by 2020. Clare County Council will aim to achieve a minimum target of 550MW from wind energy by the conclusion of this Strategy.	The Proposed Development will contribute over 50MW of renewable wind energy generation to Clare's County Clare's Wind Energy targets.
WES Five: Promotion of Community Involvement	Clare County Council will seek to promote community involvement and require community benefit where possible in Wind farm developments.	Two Community Liaison Officers (CLO) were appointed as the points of contact for the Proposed Development and have been engaging with the local community. The purpose of the CLO's was to introduce the Proposed Development to the local community, engage and establish a line of dialogue with the local community and facilitate one-to-one consultation meetings, or group meetings where requested. Please see Section 2.4 of this chapter for further detail on the Community Consultation process.
WES Six: Infrastructure Development Proposals	Proposals for the development of infrastructure for the production, storage, and distribution of electricity through the harnessing of wind energy will be considered in appropriate sites and locations, subject to relevant policy, legislation and environmental considerations.	The design and layout of the Proposed Development follows the recommendations and guidelines set out in the '*Wind Energy Development Guidelines'* (Department of the Environment, Heritage, and Local Government, 2006), the '*Draft Wind Energy Guidelines*', ('WEGs') (Department of the Environment, Heritage and Local Government, 2019), and the '*Best Practice Guidelines for the Irish Wind Energy Industry*' (Irish Wind Energy Association, 2008). The Site has been subject to a comprehensive environmental and ecological appraisal to ensure that the Proposed Development does not result in any significant adverse environmental or ecological impacts. A detailed analysis of site-specific constraints was carried out in order to inform the placement of the proposed infrastructure. These assessments are mainly included within Chapter 6 of this EIAR however

		ecological and environmental considerations are included throughout each chapter of the EIAR
WES Seven: Natura 2000 Sites	Having regard to the provisions of the Habitats Directive 92/43/EEC, where a proposed development will give rise to significant adverse direct, indirect or secondary impacts on Natura 2000 sites, (either individually or in combination with other plans or projects), permission will only be granted where there is no alternative solution and where there are imperative reasons of overriding public interest in favour of granting permission, including those of a social or economic nature.	The impact of the Proposed Development on designated sites is considered in full in the EIAR and the NIS. Chapter 6 of the EIAR and NIS conclude that the Proposed Development will not give rise to any significant negative impacts on designated sites.

Lands classified under the WES have been developed for wind farm developments based on specific objectives. The Proposed Wind Farm turbines are wholly located within an area designated primarily as a *'Strategic Area'* and also partially located within an area which is designated as *'Acceptable in Principle'* (AIP) as outlined in the WES and indicated in **Figure 5-2** below.

Strategic areas are considered suitable for wind farm development with good/excellent wind resources, access to grid, distance from properties and location outside designated sites. A target of minimum 400MW from these areas is identified in the WES. AIP areas are also considered suitable for wind farm development with sufficient wind speeds, access to grid and established patterns of inquiries. A target of a minimum of 150MW from these areas is identified in the WES. However, the Local Authority will assess each application for wind development in line with existing planning policy, objectives, and legislation.

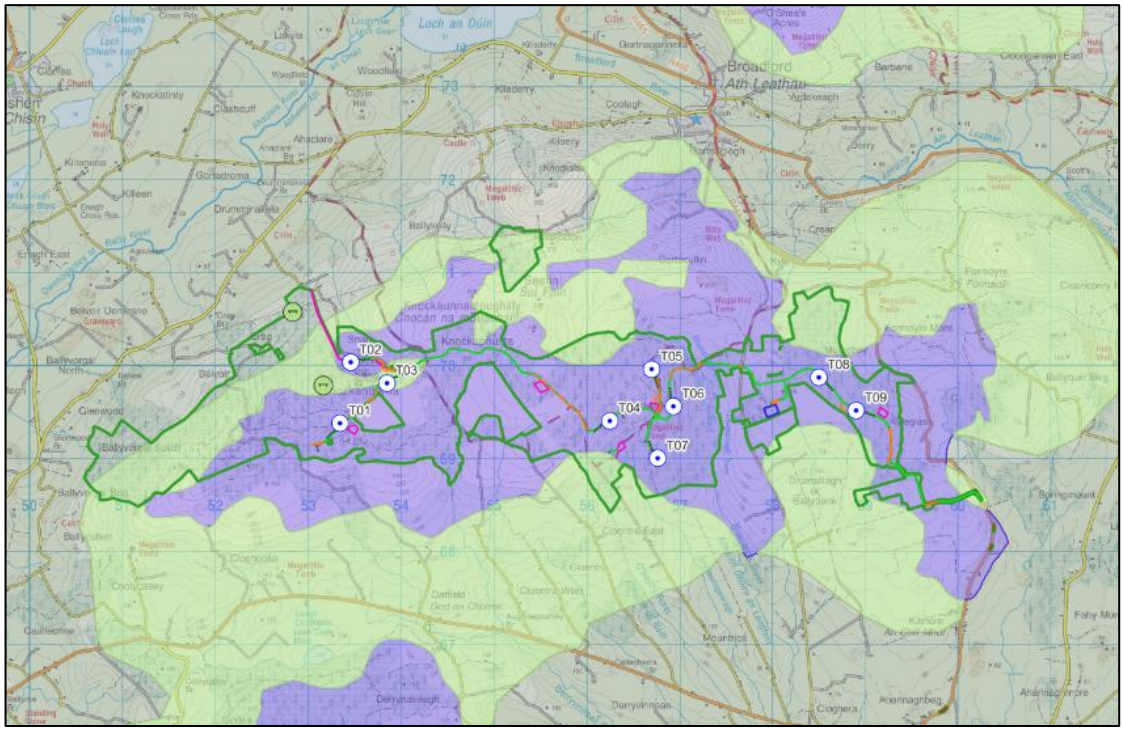

Figure 5-2 Co. Clare Wind Energy Designations

The design and layout of the Proposed Development follows the recommendations and guidelines set out in the 'Wind Energy Development Guidelines' (Department of the Environment, Heritage, and Local Government, 2006), the 'Draft Wind Energy Guidelines ', ('WEGs') (Department of the Environment, Heritage and Local Government, 2019), and the 'Best Practice Guidelines for the Irish Wind Energy Industry' (Irish Wind Energy Association, 2008).

The Proposed Development site layout as submitted as part of this application takes account of all site constraints and the distances to be maintained between turbines and other infrastructure from houses, roads, etc. The layout is based on the results of all site investigations that have been carried out during the EIAR process. As information regarding the site of the Proposed Development was compiled and assessed, the proposed layout has been revised and amended to take account of the physical constraints of the site and the requirement for buffer zones and other areas in which no turbines could be located. The selection of turbine number and layout has also had regard to wind-take, noise and shadow flicker impacts and the separation distance to be maintained between turbines. The EIAR and Wind Farm Site design process was an iterative process, where findings at each stage of the assessment were used to further refine the design, always with the intention of minimising the potential for environmental impacts.

The WES has remained largely unchanged since first published in 2009, in terms of the identified suitable areas and MW targets. The first version of the WES set a 400MW target for wind energy generation from strategic areas, 250MW of which was to be identified as the potential renewable (wind) energy generation

for the Sliabh Callan landscape character area (LCA). The WES set a "working target" of 550MW "to enable the County to make the initial steps towards a low carbon economy by 2020", which was considered to represent "a realistic target that can be achieved over the lifetime of the WES". Despite more than ten years passing since the current WES was first prepared and adopted, there has been no increase in the MW targets of the WES of the CDP. The 550MW (County Clare) and 400MW (Strategic Areas) targets remain in place and unchanged since 2009. As detailed in the preceding sections, the national and international policy context for renewable energy, wind energy and decarbonisation has changed dramatically in the same time period.

To-date, only c.145MW of wind energy projects have been permitted or constructed in the areas designated as Strategic Areas in the WES. The Proposed Development, the vast majority of which is located in such a Strategic Area would further deliver on the on the County's stated targets for Strategic Areas.

Similarly, the WES includes a target of 150 MW of wind energy generation from AIP areas. To-date, only c.81MW of wind energy projects have been permitted or constructed in the areas designated as Acceptable in Principle Areas. The Proposed Development which is partially located (1 of the 10 turbines proposed) within such an area would also further deliver on the County's stated targets for AIP Areas.

The Proposed Development is entirely consistent with the policies and objectives of the WES and CDP in contributing to the achievement of MW targets set out in those policy documents. The WES was first adopted in December 2009 and was considered ambitious at the time. However, the targets and objectives of the current WES have not kept pace with the rapidly evolving national and international policy environment for renewable energy and climate change. As a result, they are now likely to be out of date and will have to be increased further to keep in line with national and international policy.

5.4.1.3 Grid Connection

In relation to electricity, the CDP will facilitate the delivery of a secure and adequate electricity infrastructure to meet the growth in demand and to ensure that an efficient and reliable electricity supply is available to households, business, and industry. The CDP states that CCC will continue to work closely with EirGrid to facilitate the ongoing development of the grid infrastructure in line with national, regional and local requirements.

Please refer to Section 2.4.3.2 of the EIAR for further details.

5.4.2 Limerick City & County Development Plan 2022-2028

The Limerick Development Plan 2022-2028 ('LCDP') was adopted on 17th June 2022 and came into effect on 29th July 2022 and Variation No. 1 to the Limerick Development Plan 2022 – 2028 was adopted by the Elected Members on the 22nd of May 2023.

Whilst the majority of the Proposed Development site is located within County Clare, the Limerick Development Plan was also assessed as a temporary transition compound is proposed as part of the Proposed Development which will be located adjacent to the N69, in the townland of Court, Co. Limerick. At this location, it is proposed that the blades are unloaded and attached to vehicles with the capability to lift the tip of the blades to an angle of 60° in order to significantly shorten the length of the vehicle in the horizontal plane which will facilitate a more streamlined delivery of turbine components to the Site.

Chapter 9 of the LCDP outlines the Climate Action, Flood Risk and Transition to Low Carbon Economy within the Limerick Development Plan 2022-2028. The LCDP states:

"Limerick is committed to becoming a more climate resilient place and it is at the core of the Plan.

Limerick City and County Council recognises the need for a shift away from the traditional methods and play its role as a key stakeholder in making the transition to a low carbon economy."

The development is further supported by the policies and objectives outlined in **Table 5-4** below:

Table 5-4 Renewable Energy Policy – Limerick City and County Development Plan 2022-2028

Policy	Description	Proposed Development Compliance
Policy CAF P6 Renewable Energy	*It is a policy of the Council to support renewable energy commitments outlined in national and regional policy, by facilitating the development and exploitation of a range of renewable energy sources at suitable locations throughout Limerick, where such development does not have a negative impact on the surrounding environment landscape, biodiversity, water quality or local amenities, to ensure the long-term sustainable growth of Limerick.*	The Proposed Development complies with Policy CAF P6 Renewable Energy through supplying sustainable renewable energy, the Proposed Development will reduce the need for non-renewable sources like coal and oil, helping to transition toward cleaner energy usage in the Limerick and Clare region.
Objective CAF O27 Renewable Energy Production	*It is an objective of the Council to encourage and facilitate the production of energy from renewable sources, such as from bioenergy, solar, hydro, tidal, geothermal and wind energy, subject to appropriate levels of environmental assessment and planning considerations.*	The Proposed Development supports Objective CAF O27 by promoting measures that build resilience to climate change to address impact reduction, adaptive capacity, awareness raising, providing for nature-based solutions and emergency planning. The Proposed Development will contribute to the progression of advancements in climate adaptation solutions and renewable energy generation and technologies in the south-west region.
Objective CAF O28 Assessment of Renewable Energy Projects	*It is an objective of the Council to encourage the development of wind energy, in accordance with Government policy and having regard to the principles and planning guidance set out in the Department of Housing, Planning and Local Government publications relating to Wind Energy Development and the DCCAE Code of Practice for Wind Energy Development in Ireland and any other relevant guidance, which may be issued in relation to sustainable energy provisions during the course of the Plan.*	The Proposed Development is considered to be in line with Government policy for the deployment of renewable energy. The design and layout of the Proposed Development follows the recommendations and guidelines set out in the '*Wind Energy Development Guidelines'* (Department of the Environment, Heritage, and Local Government, 2006), the '*Draft Wind Energy Guidelines* ', ('WEGs') (Department of the Environment, Heritage and Local Government, 2019), and the '*Best Practice Guidelines for the Irish Wind Energy Industry*' (Irish Wind Energy Association, 2008). Furthermore, the Proposed Development has been the subject of

Policy	Description	Proposed Development Compliance
		detailed and comprehensive Community Consultation, in line with the DCCAE Code of Practice for wind energy development in relation to community engagement. Two Community Liaison Officers (CLO) were appointed as the points of contact for the Proposed Development and have been engaging with the local community. The purpose of the CLO's was to introduce the Proposed Development to the local community, engage and establish a line of dialogue with the local community and facilitate one-to-one consultation meetings, or group meetings where requested. Please see **Section 2.6.6** of the EIAR forfurther detail on the Community Consultation process.
Objective TR O39 National Roads	*It is an objective of Council to:* a) *Prevent, except in exceptional circumstances and subject to a plan-led evidence-based approach, in consultation with Transport Infrastructure Ireland, in accordance with the Section 28 Ministerial Guidelines Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012), development on lands adjacent to the existing national road network, which would adversely affect the safety, current and future capacity and function of national roads and having regard to reservation corridors, to cater for possible future upgrades of the national roads and junctions;* b) *Avoid the creation of any new direct access points from development, or the generation of increased traffic from existing direct access/egress points to the national road network, to which speed limits greater than 60km/h apply;* c) *Facilitate a limited level of new accesses, or the intensified use of existing accesses, to the national road network on the approaches to, or exit from, urban centres that are subject to*	A temporary transition compound is proposed as part of the Proposed Development which will be located adjacent to the N69, in the townland of Court, Co. Limerick. At this location, it is proposed that the blades are unloaded and attached to vehicles with the capability to lift the tip of the blades to an angle of 60° in order to significantly shorten the length of the vehicle in the horizontal plane which will facilitate a more streamlined delivery of turbine components to the Site. As set out in **Section 2.4.3.4** of the EIAR, the temporary transition compound will be in place solely for the duration of turbine blade delivery to the Wind Farm Site and will take place at night under Garda escort. Following the completion of construction, the temporary transition compound will be closed by means of fencing, and the land and boundary treatments will be restored. Policy TR 039 pertains specifically to *'new direct access point from a development'*, rather than the proposed temporary access which as set out above will be in place solely for the duration of turbine blade delivery to the Wind Farm Site, it is therefore considered that this policy is not directly applicable to the temporary transition compound.

Policy	Description	Proposed Development Compliance
	a speed limit of between 50km/h and 60km/h. Such accesses will be considered where they facilitate orderly urban development and would not result in a proliferation of such entrances;	There is also precedent set by An Bord Pleanála to permit planning applications for wind farms which include direct site access onto a national road. It is therefore concluded that the use of this temporary access will have no material impact on the current or future capacity of the road network and will not compromise the safety of the N62 during the construction phase. Please refer to **Section 2.4.3.4** of the EIAR for further information.

5.5 Policy Conclusion

From review and analysis of the policy context from an international, national, regional and local level, the following conclusions are drawn:

- The Proposed Development is fully supported by EU, national and regional policy and local policy.
- The proposed Wind Farm turbines are wholly located within areas designated as a *"Strategic Area"* and *"Acceptable in Principle"* in the WES, both of which are considered suitable for wind energy development.
- The Proposed Development aligns with the policies and objectives of the WES and CDP, contributing to the achievement of MW targets, which are now out of date and require revision to keep pace with national and international policy development.
- The Proposed Development is in compliance with Renewable Energy policies and objectives of the LCDP which prioritise the transition to a low-carbon economy through the production of energy from renewable sources.
- Policy TR039 of the LCDP, which pertains to 'new direct access point from a development', is not directly applicable to the proposed temporary transition compound for turbine blade delivery to the Wind Farm Site. The temporary transition compound for turbine blade delivery will be in place solely at night, under Garda escort, and will have no material impact on the road network's capacity or safety, with precedent set by An Bord Pleanála for similar wind farm projects.

6. PLANNING ASSESSMENT

The Proposed Development 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 Development has been designed in compliance with the Wind Energy Development Guidelines, 2006 (the Guidelines) and it has been demonstrated that the requirements of the Draft Revised Wind Energy Development Guidelines (the draft Guidelines) can also be achieved. Specifically, there are no significant environmental impacts associated with the Proposed Development 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 Development 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 Development site has been evaluated as a candidate for wind energy development based on several criteria: it is situated in a 'Strategic Area' and an 'Acceptable in Principle' zone per planning policy, is approximately 10km from two existing electrical substations for grid connectivity, and does not contain any Natura 2000 or nationally designated sites. The site's upland location experiences average wind speeds between 7.5m/s and 9.25m/s at 100m elevation, indicating commercial viability. Additionally, it benefits from existing access roads within a commercial forestry area and has a low population density of 24.22 people per square kilometer, significantly below the national average. Overall, these factors underscore the site's suitability for sustainable wind energy development.

The CDP directly supports Renewable Energy Generation through its key goals. Goal I aims for;

> "*A county that is resilient to climate change, plans for and adapts to climate change and flood risk, is the national leader in renewable energy generation, facilitates a low carbon future, supports energy efficiency and conservation and enables the decarbonisation of our lifestyles and economy.*"

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 Development provides the opportunity to harness the valuable renewable energy resources in Co. Clare. If the Proposed Development were not to proceed the opportunity to capture this additional part of Clare'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. Since its first publication in 2009, the Wind Energy Strategy (WES) has remained largely unchanged in terms of MW targets, with 550MW for County Clare and 400MW for strategic areas remaining in place. To date, only about 145MW of wind energy projects have been permitted or constructed in the designated Strategic Areas, while only around 81MW has been achieved in Acceptable in Principle Areas, despite a target of 150MW in the WES. The Proposed Development is entirely consistent with the policies and objectives of the WES and CDP in contributing to the achievement of MW targets set out in those policy documents.

6.2 Residential Amenity

When considering the amenity of residents in the context of a proposed wind farm, there are four main potential effects of relevance: 1) Shadow Flicker, 2) Noise, 3) Visual Amenity and 4) Telecommunications. 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 Guidelines 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 residual cumulative turbine noise levels associated with the Proposed Development will be within the best practice noise criteria curves recommended in the Guidelines. Therefore, it is not considered that a significant effect is associated with the Proposed Development.

In relation to Shadow Flicker, where daily or annual shadow flicker exceedances are experienced, suitable mitigation measures as outlined in Chapter 5 will be employed at the potentially affected properties to ensure that the limits set out in the Guidelines are not exceeded at any sensitive receptor within the Shadow Flicker Study Area. It is also noted that the applicant has committed to a zero-shadow flicker policy, subject to the time needed to allow the safe shut down of the turbine. Where daily shadow flicker has been predicted at buildings by the modelling software, a site visit will be undertaken firstly to determine the level of occurrence, existing screening and window orientation. Upon commissioning of the proposed Wind Farm, the shadow flicker prediction data will be used to select dates on which a shadow flicker event could be observed at one or multiple affected properties and the following process will be adhered to.

1. *Recording the weather conditions at the time of the site visit, including wind speeds and direction (i.e., blue sky, intermittent clouds, overcast, moderate breeze, light breeze, still etc.).*
2. *Recording the dwelling ID number, time and duration of site visit and the observation point GPS coordinates.*
3. *Recording the nature of the dwelling, its orientation, windows, landscaping in the vicinity, any elements of the built environment in the vicinity, vegetation.*
4. *In the event of shadow flicker being noted as occurring at the dwelling the details of the duration (times) of the occurrence will be recorded.*

In the event of an occurrence of shadow flicker at residential receptor locations, mitigation options will be discussed with the affected homeowner, including:

- Installation of appropriate window blinds in the affected rooms of the residence;
- Planting of screening vegetation;
- Other site-specific measures which might be agreeable to the affected party and may lead to the desired mitigation.

If agreement can be reached with the homeowner, then it will be arranged for the required mitigation to be implemented in cooperation with the affected party as soon as practically possible and for the full costs to be borne by the wind farm operator

The third aspect of Residential Amenity is visual amenity. A comprehensive assessment of the Landscape and Visuals effects of the Proposed Development is provided in Chapter 14 of the EIAR.

Overall, the Proposed Development is considered to be an appropriately designed development sited in a suitable landscape for wind energy development. Furthermore, the proposed turbine locations adhere to the recommended 500m set back distance in the Guidelines and also the 4 times tip height set-back

distance (for non-involved Sensitive Properties) set out in the draft Guidelines specifically for the purpose of protecting visual amenity.

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

Chapter 6 of the EIAR assesses the likely significant effects (both alone and cumulatively with other projects) that the Proposed Development may have on biodiversity, and sets out the mitigation measures proposed to avoid, reduce or offset any potential significant effects that are identified.

To inform the assessment, a comprehensive desk study and suite of field surveys have been carried out. Multidisciplinary walkover surveys and targeted habitat and species surveys were undertaken on multiple dates between 2021 and 2024. Habitat surveys of the Proposed Development Site covered the recognised optimum period for vegetation surveys/habitat mapping, i.e. April to September (Smith et al., 2011). Dedicated species/habitat specific surveys including for bats, protected mammals and detailed habitat assessment surveys were carried out, during which any incidental records of other species were also recorded (bird surveys are discussed in the section below). In addition, fisheries surveys and aquatic macroinvertebrate surveys have been undertaken as part of the detailed baseline assessment, the detailed results of which are provided in technical appendices to this EIAR.

The Proposed Wind Farm Site is dominated by commercial conifer plantations, which are dominated by mature stands but also comprise semi-mature stands, recently replanted areas and recently felled areas. Due to the upland nature of the Proposed Wind Farm Site, the majority of watercourses within the site are eroding in nature, typical of headwaters and as such are categorised as eroding/upland rivers. There are some areas of Annex I wet heath, dry siliceous heath and upland blanket bog within the EIAR Site Boundary. These areas were identified early in the design stage of the Proposed Development and the site layout has been designed to avoid these habitats where possible, with the exception of a fragmented and degraded area of wet heath which has been planted with commercial forestry. The majority of the lands on either side of the road along the length of the Proposed Grid Connection route (which is restricted to the existing road) include grassy verges, improved agricultural grasslands, hedgerows, treelines, and private dwellings and sheds. As the Grid Connection approaches the Ardnacrusha electrical substation, it follows a smaller track adjacent to areas of amenity grassland and groves of mature trees, and areas of scrub.

The construction of the Proposed Wind Farm will result in the direct loss of approximately 107.5ha of commercial conifer plantation. This habitat is assessed as being of local importance (lower value), the loss of which is not considered significant at any scale given the prevalence of this habitat in the wider area and its lack of species diversity. The Proposed Grid Connection route will not result in the permanent loss of any habitat. The construction of the Proposed Development will result in the loss of approximately 920m of hedgerow and treeline habitat, 0.45ha of oak-ash-hazel woodland (peripheral to conifer plantation) and 0.9ha of degraded wet heath. However, a Biodiversity Management Plan is in place as part of the Proposed Development. This Plan sets out measures to plant 1.7km of hedgerow/treeline habitat and replanting of 0.9ha of oak-ash hazel woodland within the Proposed Development Site. The Biodiversity Management Plan also includes for the reversion of forestry within the EIAR Site Boundary to peatland which will link up existing areas of wet heath and upland blanket bog and result in a net gain in peatland habitat. The measures proposed in the Biodiversity Management Plan will provide benefits for both hen harrier and lesser horseshoe bat (Appendix 6-5 of the EIAR).

Bat species composition found at the Proposed Development site was typical of the geographic location and habitats present, which primarily include conifer plantation forestry. Bats as an ecological receptor have been assigned Local Importance (Higher value) on the basis that the habitats within the site are utilized by a regularly occurring bat population of Local Importance. The Proposed Development site is

located in proximity of two European Sites designated for the protection of Lesser horseshoe bats (Danes Hole, Poulnalecka Special Area of Conservation (SAC) and Ratty River Cave SAC). This species has been recorded foraging and commuting across the site, with activity peaks considered high during transitional periods in Autumn and Spring. The populations associated with the designated roosts are likely to utilise the site as it is within or in close proximity of their core foraging ranges (2.5km); therefore, the Lesser horseshoe population recorded on the site has been assigned International Importance. Following the implementation of mitigation, no potential for residual significant effects with regard to loss of commuting and foraging habitat, loss or damage to roosts, displacement or other construction phase impacts have been identified. In relation to potential collision risk and injury with operational turbines, a bespoke adaptive monitoring and mitigation strategy has been devised for the Proposed Development in line with NatureScot (2021) Guidance, which will ensure that there is no potential for significant residual effects on local bat populations during the operational phase of the Proposed Development.

Evidence of otter activity was found in the form of an otter print within the EIAR Site Boundary and in the form of spraint along the larger watercourses downstream of the Proposed Development site. However, no otter holts or other resting places were recorded during any of the ecological surveys. There is no potential for direct loss or fragmentation of significant otter habitat including loss of breeding or resting places. All proposed watercourse crossings along the Grid Connection are within or under existing bridge and culvert crossings. Proposed internal water crossing structures associated with wind farm access roads (5 new and 1 existing) will be constructed using bottomless and clear-span culverts, therefore there are no instream works proposed with regard to access roads or the Grid Connection. Given that no otter holts or resting places were recorded within the EIAR Site Boundary, no direct mortality or any barrier to the movement of otter is anticipated. Furthermore, as part of embedded mitigation for the Proposed Development, the majority of wind farm infrastructure is located at least 50m away from natural watercourses. Given the likely presence of otter within the Proposed Development site, a potential for temporary significant effect as a result of disturbance was found on a precautionary basis and mitigation measures have been prescribed such that no residual significant effect is predicted.

Badger and pine marten activity was recorded within the EIAR Site Boundary in the form of scat and mammal trails. Direct observations of red squirrel as well as feeding remains were also recorded. However, following targeted surveys within the footprint and surrounding areas of the Proposed Development, no breeding or resting places of badger, pine marten or red squirrel were recorded. Therefore, no potential for significant effect as a result of habitat loss or direct mortality is predicted. However, on a precautionary basis, mitigation to avoid the potential for significant effect as a result of disturbance has been prescribed and include pre-commencement surveys of the Proposed Development site for these species.

There is no suitable habitat for Marsh Fritillary within the footprint of the Proposed Development. Devil's bit scabious (Succisa pratensis), the foodplant of the caterpillar of this species, is present within the peatland area within the EIAR Site Boundary to the north, adjacent to Gortacullin Bog Natural Heritage Area (NHA). The habitats throughout the rest of the EIAR Site Boundary do not contain a sufficient amount of Devil's Bit Scabious to support the species. Furthermore, there will be no loss of any areas containing the foodplant as a result of the Proposed Development.

Common frog was observed on occasion within the EIAR Site Boundary, however no potential for impacts on these species were identified. Smooth newt, Atlantic salmon, lamprey, European eel, otter, and eDNA of white-clawed crayfish was recorded within watercourses downstream of the EIAR Site Boundary. However, mitigation measures with regard to protection of water quality during construction and operation of the Proposed Development are prescribed such that no potential for residual significant effect is predicted. As detailed above, there is no potential for direct impacts to these species.

No residual significant effects on surface water quality, groundwater quality or the hydrological/ hydrogeological regime were identified during construction, operation, or decommissioning. No significant effects as a result of drainage effects to nearby designated sites or on local peatlands was identified. A full hydrological assessment in relation to the Proposed Development has been carried out in Chapter 9 of the EIAR.

In relation to nationally designated sites, Gortacullin Bog NHA, Danes Hole, Poulnalecka proposed Natural Heritage Area (pNHA) and Cloonlara House pNHA were identified as being within the Likely Zone of Influence and are assessed in the EIAR. In addition, the following nationally designated sites are downstream of the Proposed Development and are also assessed in the EIAR: Doon Lough NHA, Castle Lake pNHA, Fergus Estuary and Inner Shannon – North Shore pNHA and Inner Shannon Estuary – South Shore pNHA.

In relation to European designated sites, the potential for adverse effects on Danes Hole, Poulnalecka SAC, Ratty River Cave SAC, Lower River Shannon SAC and River Shannon and River Fergus Estuaries Special Protection Area (SPA) has been fully assessed within the Appropriate Assessment Screening and Natura Impact Statement (NIS) that accompanies this planning application along with this EIAR. The NIS has been prepared to provide the competent authorities with the information necessary to complete an Appropriate Assessment screening and an Appropriate Assessment for the Proposed Development in compliance with Article 6(3) of the Habitats Directive. The NIS concludes that the Proposed Development, individually or in-combination with other plans or projects, will not adversely affect the integrity of any European Site.

It is therefore judged that, provided that the Proposed Development is constructed and operated in accordance with the design, best practice and mitigation that is described within this application, significant individual or cumulative effects on ecology are not anticipated at the international, national, county, or local scales or on any of the identified Important Ecological Features.Please refer to Chapter 6 of the EIAR for further details.

6.3.1 Appropriate Assessment and NIS

Screening for Appropriate Assessment was carried out for the Proposed Development, 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:

The following European Sites are identified in the AA Screening as being within the Likely Zone of Impact and are assessed fully in the NIS that accompanies this application:

- Danes Hole, Poulnalecka SAC [000030]
- Ratty River Cave SAC [002316]
- Lower River Shannon SAC [002165]
- River Shannon and River Fergus Estuaries SPA [004077]

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

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 and operation of the Proposed Development does not adversely affect the integrity of European sites. Therefore, it can be objectively concluded that the Proposed Development, 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 Development for further details.

6.4 Ornithology

The Ornithology Chapter of the EIAR assesses the likely significant effects that the Proposed Development may have on bird species.

Based on the detailed assessment, it is considered that the potential effects of the Proposed Development upon birds will not be significant. Effects associated with habitat loss, disturbance displacement, collision risk and cumulative effects have been assessed to be no greater than long-term moderate negative effect (EPA, 2022) and low effect significance (Percival, 2003). With the exception of hen harrier, for which long-term significant negative effect (EPA, 2022) and high effect significance (Percival, 2003) were predicted. However, as detailed in Section 7.8, of Chapter 7 of this EIAR, a robust compensation and enhancement plan is proposed to reduce the magnitude of the impact from long-term significant negative effect (EPA, 2022) and high effect significance (Percival, 2003) to long-term slight negative effect (EPA, 2022) and low effect significance (Percival, 2003).

The implementation of the prescribed mitigation measures will render any potential effects on avian receptors to low significance. In conclusion, no significant effects as a result of the Proposed Development are foreseen on key ornithological receptors of the study area.

Please refer to Chapter 7 of the EIAR for further details.

6.5 Land, Soils and Geology

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

A comprehensive impact assessment of the Proposed Wind Farm site and the Proposed Grid Connection on the land, soils and geological environment has been undertaken. The assessment is based on a desk study, walkover surveys and a comprehensive data set which was obtained during site investigations. The design of the Proposed Wind Farm is based on extensive site-specific data, with the layout intended to minimise impacts on the local land, soils and geological environment.

Based on the peat depth information for the Wind Farm Site, the peat is shallow with depths ranging from 0 to 3.9m with an average peat depth of 0.55m. The peat deposits are underlain by glacial tills or lie directly on bedrock. The glacial tills generally consist of slightly sandy slightly gravelly SILT/CLAY with cobbles and boulders and/or silty SAND and/or GRAVEL with cobbles and boulders. In terms of bedrock geology, the Wind Farm Site is underlain predominantly by Old Red Sandstones (undifferentiated) which were encountered during the site investigations.

A Geotechnical and Peat Stability Assessment was undertaken for the Wind Farm Site (Appendix 8-1) and it demonstrates an acceptable margin of safety, that the Wind Farm Site is suitable for the Proposed Development and is considered to be at low risk of peat failure. A number of control measures are prescribed in the peat stability assessment to manage all risks associated with peat instability. All of the detailed control measures will be implemented in full.

An assessment of the construction phase, operational phase and decommissioning phase has been completed, along with a cumulative assessment for each phase. Based on the above, and with implementation of the prescribed mitigation measures, no significant effects on the land, soils and geology environment will occur as a result of the Proposed Development.

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

6.6 Hydrology and Hydrogeology

This chapter assesses the likely significant effects that the Proposed Development may have on hydrology and hydrogeology and sets out the mitigation measures proposed to avoid, reduce or offset any potential significant effects that are identified.

Wind Farm Site

The surface of the Wind Farm Site is drained by a network of forestry drains that are typically spaced every 15 to 20m. The forestry drainage network discharges into several natural streams which are sourced from the area of the Wind Farm Site.

Regionally, the Wind Farm Site is located across 2 no. regional surface water catchments. The east and south of the Wind Farm Site is located in the Lower Shannon surface water catchment and drains to the Blackwater River. Meanwhile, the northwest of the Wind Farm Site is located in the Shannon Estuary North surface water catchment and drains to the Owenogarney River. All watercourses draining the Wind Farm Site and Grid Connection eventually discharge into the Shannon Estuary.

Due to the nature of wind farm developments, being near surface construction activities, effects on groundwater are generally negligible and surface water is generally the main sensitive receptor assessed during impact assessments. The primary risk to groundwater would be from oil spillage and leakages at turbine foundations or during construction plant refuelling. These are common potential impacts to all construction sites (such as road works and industrial sites). These potential contamination sources are to be carefully managed at the Proposed Development site during the construction and operational phases of the development and measures are proposed within the EIAR to deal with these potential minor local impacts.

During each phase of the Proposed Development (construction, operation, and decommissioning) a number of activities will take place at the proposed site, some of which will have the potential to significantly affect the hydrological regime or water quality at or downstream of the Wind Farm Site. These significant potential effects generally arise from sediment input from runoff and other pollutants such as hydrocarbons and cement-based compounds.

Surface water drainage measures, pollution control and other preventative measures have been incorporated into the project design to minimise significant impacts on water quality and downstream designated sites. A self-imposed 50m stream and lake buffer was used during the design of the Proposed Development, thereby avoiding sensitive hydrological features. The surface water drainage plan will be the principal means of significantly reducing sediment runoff arising from construction activities and to control runoff rates. The key surface water control measure is that there will be no direct discharge of wind farm runoff into local watercourses or into the existing drainage network. This will be achieved by avoidance methods (i.e. stream buffers) and design methods (i.e. surface water drainage plan). Preventative measures also include fuel and concrete management and a waste management plan which will be incorporated into the Construction and Environmental Management Plan (CEMP).

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 Development with the implementation of the prescribed mitigation measures. This EIAR chapter 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 Development drainage system will be designed to slow surface water runoff from the proposed site by providing greater attenuation. This will ensure that the Proposed Development does not alter downstream surface water flows and will not contribute to downstream flooding.

A hydrological assessment of potential impacts on local designated sites was undertaken. Following implementation of the appropriate mitigation measures as outlined in the EIAR no significant impacts on any downstream designated sites will occur as a result of the Proposed Development.

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 Development. 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 Development. The Proposed Development has been found to be fully compliant with the WFD. The Proposed Development will not cause a deterioration of the status of any water body under the WFD and will not undermine the attainment by any such body of 'Good' status.

An assessment of potential cumulative effects associated with the Proposed Development 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 cumulative effects on the hydrological and hydrogeological environments.

No significant effects on the water environment will occur during the construction, operation or decommissioning of the Wind Farm.

Turbine Delivery Route

The Turbine Delivery Route extends from Foynes Port to the Wind Farm Site. Works are proposed at a total of 4 no. locations along the route. 3 no. locations involve minor roadworks whilst a temporary construction compound will be constructed along the N69 in the townland of Court.

Minor excavation of soils and subsoils will be required at these work locations. Storage and handling of hydrocarbons/chemicals will be carried out using best practice methods. Due to the shallow and minor nature of the works and with the implementation of the prescribed mitigation measures there will be no effects on surface of groundwater quality.

A flood risk assessment completed for the Proposed Development revealed that the proposed temporary construction compound along the N69 is mapped within 1 in 100-year fluvial flood zone and the 1 in 10-year coastal flood zones. However, given that the compound will only be present for a short period of time (~8 months) and it unlikely that a fluvial/coastal flood event of this magnitude will occur during the period when the compound is present. Furthermore, the compound has a very limited footprint in comparison to the overall flood zones (the footprint equates to 0.2% of the modelled flood zones). Flood displacement calculations have shown that in the event that the compound was completely submerged by a flood event, that it would have an imperceptible effect on flood levels (~3mm rise in water levels across the flooded area).

No significant effects on the hydrological and hydrogeological environment will occur.

Grid Connection

The Grid Connection from the proposed onsite 110kV substation to the existing Ardnacrusha 110kV substation is 9.2km and is located entirely along existing forestry tracks and in the local public road corridor.

The Grid Connection is located with the Lower Shannon surface water catchment with a total of 4 no. crossings over EPA mapped watercourses. The Lower River Shannon SAC is located downstream of the Grid Connection. Due to the minor and transient nature of the proposed works, coupled with the prescribed mitigation measures, there will be no significant effects on water quality or downstream designated sites.

Approximately 1.4km of the Grid Connection is underlain by a Regionally Important Karst Aquifer in the vicinity of Ardnacrusha. However, due to the minor, shallow and transient nature of the works, the lack of any mapped karst features in the vicinity of the Grid Connection and the prescribed mitigation measures, there will be no significant effect on karst features or the underlying karst aquifer. Furthermore, due to the minor, shallow and transient nature of the works and the prescribed mitigation measures, there will be no significant effect on any local well supplies.

An assessment of the construction, operational and decommissioning phases has been completed, along with a cumulative assessment for each phase. Based on the above, and with implementation of the outlined mitigation measures, no significant effects on the surface water and groundwater environments will occur.

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

6.7 Climate

An assessment of the potential significant direct and indirect effects on climate arising from the construction, operation and decommissioning of the Proposed Development has also been completed as part of the EIAR. The objective of the assessment is to assess the potential effects that the Proposed Development may have on Climate and sets out proposed mitigation measures to avoid, reduce or offset any potential significant effects that are identified.

An assessment of the impacts of the Proposed Development in terms of potential carbon losses and savings was undertaken, taking into account drainage, habitat improvement, forestry felling and site restoration was undertaken. Based on the Scottish Government carbon calculator as presented in Section 11.5.3.1, of Chapter 11 of the EIAR, the Proposed Development will result in the loss of 160,051tCO2e during the construction phase, the details of these carbon losses are provided in Table 11-6 of Chapter 11 of the EIAR.

Using the maximum capacity output of 64.8MW, the 160,051 tonnes of CO2 that will be lost to the atmosphere due to changes in soil and ground conditions and due to the construction and operation of the Proposed Development will be offset by the Proposed Development in approximately 33 months of operation. Using the minimum capacity output of 51.3MW, the CO2 that will be lost to the atmosphere during the construction phase will be offset by the Proposed Development in approximately 41 months of operation.

Following construction of the Proposed Development, 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 Development will have a Direct Long-Term Moderate Positive Effect on climate as a result of reduced greenhouse gas emissions. Operation of the Proposed Development 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.

6.8 Archaeology and Cultural Heritage

Chapter 13 of the EIAR provides an assessment of the potential effects of the Proposed Development on the Cultural Heritage resource. 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 30m buffer zone around megalithic

tomb CL044-068— prior to the commencement of construction works, pre-development archaeological testing of the Proposed Development infrastructure (turbine bases, hardstands, compounds, new roads, substation, grid connection route in off-road areas, etc) and archaeological monitoring during the construction stage of the project, including at specified locations along the proposed Grid Connection route.

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 route have been identified. Mitigation measures are proposed where deemed appropriate and include archaeological monitoring of construction works along the proposed Grid Connection where the latter extends through the Zone of Notification for recorded monuments.

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 operational 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 operational and proposed wind farms, no cumulative effects to the immediate setting of cultural heritage assets will occur.

Please refer to Chapter 13 of the EIAR for further details.

6.9 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 Development are assessed during the construction, operational and decommissioning phases of the Proposed Development. The LVIA also consider cumulative effects i.e., the incremental effects of the Proposed Development in combination with other plans and/or projects.

The Wind Farm Site is located in the Slieve Bernagh Uplands LCA of Co. Clare, which is situated on commercial forestry lands of 'Low' sensitivity which has been highly altered by human activity. Imagery was captured from a total of 44 No. viewpoints in the LVIA Study Area for the production of photomontages and photowire visualisations. These visualisations were used to assess the landscape and visual effects of the proposed turbines on all of the receptors scoped in for assessment during preliminary analysis using ZTV mapping. The siting and design of the Proposed Development are found to comply with development guidelines for wind energy in terms of its location on ridgelines and 4-times-tip-height set-back distance, spatial extent, spacing and layout of turbine clusters within undulating mountain topography, height and scale within the landscape and capacity to absorb cumulative wind energy developments.

The LVIA addresses all potential cumulative interactions through the use of photomontage visualisations and written descriptions. The LVIA emphasises that the probability of cumulative effects with other proposed developments is reliant upon the consenting process and a number of other post consent factors

which will influence whether the project is constructed. On balance, the Proposed Development is an appropriately designed development sited in a suitable landscape capable of effectively accommodating the proposed wind energy development.

Please refer to Chapter 13 of the EIAR for further details.

6.10 Material Assets

The EIAR also provides an assessment of the likely significant effects of the Proposed Development on transportation infrastructure (Section 15.1 Traffic and Transport), on Telecommunications and Aviation (Section 15.2.3) and Other Material Assets (Section 15.2.2), which are economic assets of human origin.

Traffic and Transport

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

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 both the additional traffic volumes that will be generated on the road network, and the geometric requirements of the abnormally large loads associated with the delivery of wind turbine components. The requirements of the additional traffic and abnormal sized loads generated during the construction stage are assessed on both the external road network and at the junctions that will provide access to the Site.

It should be noted that abnormal weight loads are not a feature of the turbine delivery vehicles, they are of abnormal in size only. All construction and delivery vehicles for the Proposed Development will be subject to the standard axle weight requirements set out under Road Traffic (Construction and Use of Vehicles) Regulations 2003 (S.I. No. 5 of 2003) and therefore the loadings from construction traffic will not exceed the relevant standards. Notwithstanding the need to use specialist vehicles to facilitate turbine delivery, it should be noted that the number of load-bearing axles for any specialist vehicles carrying large loads are designed to ensure that the load on any one axle does not exceed acceptable load bearing statutory limits. Therefore, the structural integrity of the national and regional road network used during the construction of the Proposed Development is adequate to provide for these accepted loads.

The magnitude of the increase in traffic volumes experienced on the surrounding network is identified during the various construction stages of the Proposed Development. Traffic management measures are also provided in Section 15.1.11.6 aimed at minimising the traffic impact on the local highway network. Refer also to Appendix 15-2 for the Traffic Management Plan (TMP).

Telecommunications and Aviation and Other Material Assets

Wind turbines, like all large structures, have the potential to interfere with broadcast signals, by acting as a physical barrier or causing a degree of scattering to microwave links. The most significant effect at a domestic level relates to a possible flicker effect caused by the moving rotor, effecting, for example radio signals. The most significant potential effect occurs where the renewable energy development is directly in line with the transmitter radio path.

During the development of any large project that holds the potential to affect telecoms or aviation, the Developer is responsible for engaging with all relevant Telecoms Operators and the relevant Aviation Authorities to ensure that the proposal will not interfere with television or radio signals by acting as a physical barrier. In the event of any potential impact, the Developer for each individual project is responsible for ensuring that the necessary mitigatory measures are in place.

A total of 3 no. telecommunications links and 2 no. broadcast transmission links are within the vicinity of the Site. The Applicant commissioned Ai Bridges to carry out a Telecommunications Impact Assessment (TIA) to evaluate the possible impacts of the proposed Wind Farm on existing telecommunications operator networks. The findings of TIA concluded that the Wind Farm will not impact any of the telecom operator radio networks in the area.

The nearest airport to the Proposed Development site is Shannon Airport, County Clare, located approximately 13 kilometres southwest of the Proposed Development. A scoping response was received from the Department of Defence (DoD) and the Irish Aviation Authority (IAA).

The scoping response of the DoD has requested that standard lighting requirements be used at the Proposed Development site. These requirements will be complied with for the Proposed Development and any further details will be agreed in advance of construction with the DoD. The coordinates and elevations for built turbines will be supplied to the IAA, as is standard practice for wind farm developments.

The Proposed Development has been designed to avoid existing underground electricity cables and the appropriate separation distances in accordance with ESB requirements have been maintained.

Due to the Wind Farm Site's proximity to Shannon Airport, and in consideration of the IAA's scoping response, an Aviation Impact Assessment (AIA) has been undertaken by Ai Bridges and Cyrrus Ltd. The AIA in Appendix 15-6 should be consulted for detailed information on the assessments, however a brief summary of the potential impacts and mitigation measures to minimise or eliminate the impacts are summarised below.

- Impact on Instrument Flight Procedures (IFPs) Shannon Airport.
    - IFPs - The impacted IFP's will be withdrawn in line with the State Performance Based Navigation (PBN) Plan for Ireland on 06 June 2030 after which time there will no longer be an impact to the impacted IFP's.

      Applicant Comment

      The implementation of the State PBN Plan by 06th June 2030 is welcomed. What this means in the context of building out the proposed Wind Farm is that several of the potential issues identified in the detailed assessments noted earlier will no longer be relevant. As such, proposed turbines T01, T02 and T03 of the proposed Wind Farm currently noted as penetrating the departure and approach obstacle protection areas at Shannon Airport. Under the new navigation measures, proposed turbines T01, T02 and T03 could be erected, albeit not until the 07th June 2030 when the new measures are rolled out.

      As such, the Applicant confirms that should An Bord Pleanála deem it appropriate, a planning condition attached to any grant of planning permission issued requiring that turbines T01, T02 and T03 will not be erected until the measures are in force, is acceptable. Suggested wording is set out below:

      Turbines T01, T02 and T03 as identified on the plans and particulars accompanying the planning application shall not be erected until such time as the IFP measures relating to Shannon Airport are in force.

      Reason: in the interests of aviation safeguarding

- The IAA agreed in principle that increasing the Procedure Design Gradient for the Standard Instrument Departure (SID) departure would be incorporated in updated IFP designs by late 2022.

- The IAA recommends withdrawal of the VOR IAP on the basis that this would be in line with the State PBN plan and that RNP IAPs are planned for Shannon during 2022. Also as referenced in the State PBN Plan (section 11 in Appendix 14) the Shannon Airport currently has approach runways are in line for Required Navigation Performance (RNP) approaches by 25 January 2024.

- ATCSMAC Chart - The IFP Assessment shows that there are four mitigation options that allows for safe vectoring onto the Instrument Approach Procedures (IAP), which includes an option for a shortened Instrument Landing System (ILS) on an RNP approach. The ATCSMAC can be re-designed on the basis of an Airspace Redesign Concept i.e. a RNP Instrument Approach Procedure (IAP) on a shortened ILS as a possible mitigation, and which would be operationally feasible for Shannon Air Traffic Control (ATC).

  Applicant Comment

  The ATCSMAC at Shannon Airport consists of four sectors. The impact of the turbines on the ATCSMAC Chart on Sector 1 and Sector 2 can be addressed by four proposed redesign options which enable an evaluation of the potential ways to remove the impact to the ATCSMAC. These redesign options would need to be evaluated by Shannon Airport and the IAA to determine of the proposed designs would allow for safe and effective vectoring of aircraft.

  The applicant would be willing to contribute its share of the costs associated with any implementable and viable mitigation measure solution, as required, on a pro-rata basis with any of the listed projects that are granted a planning consent. During the engagements with the IAA in 2022 they stated

  "Aside for the costs in production of further assessments as referenced, system upgrades for filtering, flight procedures changes, ATC changes to support the mitigate for the new obstacles, as well as continuing additional costs associated with more flight check activity on an bi-annual basis, has the potential to cost the ANSP in the region of €200,000.00+, should planning be granted as proposed.

- Impact on Woodcock Hill Radar

  - Reflections - The Thales RSM970 MSSR Sited at Woodcock Hill is 5.6 km from the nearest wind turbine. The Thales radar utilizes a two-stage system to prevent both temporary (Dynamic) and permanent (Static) reflections being displayed. It also has inbuilt adaptive reflection processing. This is referenced in The Thales RSM970 MSSR Technical Description Document (Appendix 11.2).To prevent possible reflection issues, some minor optimisations may be required. This is usually carried out as part of the scheduled maintenance of the equipment.

  - The IAA\AirNav have scheduled an upgrade in the next two to five years of all the radar surveillance equipment in the state and these upgrades will likely include updates to the two-stage system within MSSR to prevent reflections being displayed. This would be conformed as part of an asset conductions survey by the Radar Manufacturer (Thales).

- Deflections - The Thales RSM970 MSSR uses a well-established processing system to remove any False Replies Unsynchronised In Time (FRUIT). This process removes the issue of deflections from the system. No additional optimisation is required as a DEFRUITER is part of the standard MSSR processing on the Thales system.

- Shadowing - Due to the close proximity of the Turbines to the Woodcock Hill radar, some shadowing will occur. A detailed previous assessment was completed by Cyrrus on the previous 18-turbine design. It was considered any shadowing would be minimal and be operationally tolerable. With the reduction in turbines to 9, it is assumed the shadowing would be no worse than the previous assessment and so remain operationally tolerable.

- Impact on Navigation Aids (NAVAIDS)

  - The Proposed Development will have no adverse effect on the Flight Inspection Procedures and procedures associated with the Runway 24 Instrument Landing Systems at Shannon Airport.

Residual Impact

The findings of the AIA concludes that with the assessment outcomes and mitigation measures, the residual effects are not significant.

Significance of Effects

Based on the assessment above there will be no significant effects.

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

7. SUMMARY AND CONCLUSION

The provision of wind energy developments such as the Proposed Wind Farm is strongly supported by International, National and Regional policies aimed at achieving the transition to a low carbon and climate resilient economy, increasing renewable energy generation, and enhancing energy security. Specifically, the Proposed Development will contribute to achieving the State's target of generating 9GW of electricity from onshore wind and reducing GHG emissions by 80% by 2030 as set out in the CAP24. Under the Climate and Low Carbon Development (Amendment) Act 2021, public bodies, including County Councils and An Bord Pleanála, must carry out its functions, in so far as practical, in accordance with the latest Climate Action Plan.

The Proposed Wind Farm, if permitted, will contribute towards the national target of **9GW** of onshore wind energy by 2030. As the largest portion of Ireland's renewable electricity will be generated by wind, achieving the wind energy target is crucial for the country to achieve 80% renewable electricity. Achieving 80% renewable electricity is also critical for decarbonising other carbon emitting sectors (transport, heating, etc) as these sectors decarbonisation are reliant on electrification. Onshore wind energy is, and will continue to be, the backbone of the decarbonisation of the Irish society. Given the scale of the challenge and the importance of onshore wind energy on the Irish grid, it is clear that every viable site brought forward for wind energy development must be considered on its individual merit and suitability for wind energy development.

It is the policy of the Clare County Development Plan 2023 – 2029, ***to 'encourage and to favourably consider proposals for renewable energy developments .... in order to meet National, Regional and County renewable energy targets'*** (CDP 11.47 - a). 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. In this context, it is critical that policy CDP11.47(a) is acted upon, as it will take hundreds, if not thousands, of individual renewable energy projects, such as the Proposed Development, to decarbonise the Irish economy.

It is re-iterated for clarity that the Proposed Development is consistent with the Clare County Development Plan 2023-2029 which acknowledges significance of climate change and the need for continued support /and investment within renewable energy generation. Furthermore, the Proposed Wind Farm turbines are wholly located within an area designated primarily as a 'Strategic Area' and also partially within an area which is designated as 'Acceptable in Principle'. Both areas are considered suitable for wind energy development as outlined in the WES. The Proposed Development will support the Council in achieving its objective to ensure the security of energy supply by accommodating the development of wind energy resources.

The Proposed Development is in compliance with Renewable Energy policies and objectives of the LCDP which prioritise the transition to a low-carbon economy through the production of energy from renewable sources. In addition, Policy TR039 of the LCDP, which pertains to *'new direct access point from a development'* is not directly applicable to the proposed temporary transition compound for turbine blade delivery to the Wind Farm Site. The temporary transition compound for turbine blade delivery will be in place solely at night, under Garda escort, and will have no material impact on the road network's capacity or safety, with precedent set by An Bord Pleanála for similar wind farm projects

The Proposed Development 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 Development during either the construction, operational or decommissioning phases of the development nor will the Proposed Development have any significant effects on any European Sites (as assessed within the accompanying Natura Impact Statement).

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