

Environmental Impact Assessment Report

Cummeennabuddoge Wind Farm

Chapter 1: Introduction and Background

Cummeennabuddoge Wind (DAC)

September 2024



Contents

1	Introduction	1	
	1.1 Structure of the EIA Report	1	
	1.2 The Applicant	2	
	1.3 The Planning Application	2	
	1.4 Proposed Development Site	2	
	1.4.1 Connection to the National Grid	3	
	1.4.2 Site Access and Turbine Delivery Route	3	
	1.4.3 Statutory Designations	3	
	1.5 Proposed Development Overview	4	
	1.6 Purpose of the EIA Report	5	
	1.7 EIA Screening	6	
	1.8 The EIA Team	6	
	1.9 Additional Documents	8	
	1.9.1 Planning Statement	8	
	1.9.2 Natura Impact Statement	8	
	1.10 Public Consultation	9	
	1.10.1 Public Information Days (PIDs)	10	
	1.10.2 Informing the Public and Local Residents	10	
	1.11 Need for the Development	11	
	1.11.1 Summary	11	
	1.11.2 The Climate Action Plan 2023	11	
	1.11.3 The Renewable Energy Directive (recast) 2018/2001/EU	11	
	1.11.4 Revised Renewable Energy Directive EU/2023/2413		
	1.11.5 REPower EU Energy Plan 2022	12	
	1.12 Viewing the EIA Report	13	
	1.13 References	14	

Contents

Tables

Table 1-1: Relationship of E	EIAR Chapters to EIA Directive Requirements	5
Table 1-2: EIA Team		6

Figures

	Figure 1-1a: Site Location Plan
	Figure 1-1b: Site Location Plan – Works Along the Turbine Delivery Route
	Figure 1-2: Site Layout Plan
	Figure 1-3: Abnormal Loads Route
	Figure 1-4: Site Context Plan
Lis	t of Technical Appendices

Appendix 1-1: Curriculum Vitae Appendix 1-2: Community Engagement Report



Glossary of Terms

Term	Definition
The Applicant	Cummeennabuddoge Wind Designated Activity Company (DAC)
The Agent	Atmos Consulting Limited
Environmental Advisors and Planning Consultants	Atmos Consulting Limited
Environmental Impact Assessment	A means of carrying out, in a systematic way, an assessment of the likely significant environmental effects from a development
Environmental Impact Assessment Regulations	Schedule 6 of the Planning and Development Regulations 2001 (as amended)
Environmental Impact Assessment Report	A document reporting the findings of the EIA and produced in accordance with the EIA Regulations
The Proposed Development	Cummeennabuddoge Wind Farm
The Proposed Development Site	The land enclosed by the red line shown on Figure 1-1a
The Planning Act	Directive 2011/92/EU (as amended by Directive 2014/52/EU, the EIA Directive).

List of Abbreviations

Abbreviation	Description
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
FEI	FutureEnenrgy Ireland
GDG	Gavin and Doherty Geosolutions
HGV	Heavy Goods Vehicles
NGR	National Grid Reference
NIS	Natura Impact Statement
NTS	Non-Technical Summary
PNHA	Proposed Natural Heritage Area
RED	Revised Renewable Energy Directive
SAC	Special Area of Conservation
SPA	Special Protection Area



1 Introduction

Atmos Consulting Ltd has prepared this Environmental Impact Assessment Report (EIAR) on behalf of Cummeennabuddoge Wind Designated Activity Company (DAC) 'the Applicant' to accompany an application for consent to An Bord Pleanála ('the Board') to develop a wind farm on land at Clydaghroe and Cummeennabuddoge (CMBG), Clonkeen, County Kerry (the 'Proposed Development').

The Proposed Development consists of 17 wind turbines with a maximum tip height of 200 metres (m) and a maximum export capacity of 122.4 Mega Watts (MW), and associated infrastructure including hardstandings, cabling and access roads. The Proposed Development also consists of a 110kv grid connection to Ballyvouskil and associated works along a turbine delivery route within County Cork.

A full description of the Proposed Development, including details of the limited turbine range, is included in Chapter 4 of this EIAR

The EIAR has been prepared in accordance with the requirements of EIA Directive 2011/92/EU as amended by Directive 2014/52/EU (the 'EIA Directive').

1.1 Structure of the EIA Report

The EIA Report is structured as follows:

- Volume 1: NTS;
- Volume 2: Main EIA Text;
- Volume 3: Figures
- Volume 4: Technical Appendices;
- Volume 5; Confidential Appendices.

The EIAR is structured around the following chapter headings:

- Chapter 1: Introduction and background;
- Chapter 2: EIA Approach & Methodology;
- Chapter 3: Design Evolution and Consideration of Reasonable Alternatives;
- Chapter 4: Description of Development;
- Chapter 5: Population and Human Health;
- Chapter 6: Landscape and Visual Impact Assessment;
- Chapter 7: Traffic Impact and Access Route Assessment;
- Chapter 8: Biodiversity;
- Chapter 9: Ornithology;
- Chapter 10: Soils, Geology and Hydrogeology;
- Chapter 11: Hydrology, Water Quality and Flood Risk;
- Chapter 12: Air and Climate;
- Chapter 13: Noise;
- Chapter 14: Cultural and Archaeological Heritage;
- Chapter 15: Shadow Flicker;
- Chapter 16: Material Assets (including Aviation and telecommunications);
- Chapter 17: Risks and Major Accidents;



- Chapter 18: Interactions of the Foregoing; and
- Chapter 19: Schedule of Mitigation.

1.2 The Applicant

The shareholders of the Applicant are FuturEnergy Ireland (FEI) and SSE Renewables. Both companies have been involved in building and operating wind farm projects in Ireland over the past 10 years and are currently working in a co-development arrangement to reduce carbon emissions and contribute to national and international climate change targets.

FEI is a joint venture company owned on a 50:50 basis by Coillte CGA and ESB. This business combines the State's strongest assets and expertise in onshore renewable energy development on behalf of the people of Ireland.

As one of the largest dedicated developers of onshore wind in Ireland, FEI's mission is to maximise the potential of national resources and accelerate Ireland's transformation to a low carbon energy economy.

The aim of FEI is to materially help the country deliver on its green energy targets, achieving net zero emissions by 2050, as set out in the Government's Climate Action Plan and legislated for under the Climate Action and Low Carbon Development (Amendment) Act 2021. In this regard, FEI is looking to actively drive Ireland's transition to a low carbon economy by developing 1GW of wind energy projects by 2030.

FEI is dedicated to developing best-in-class, commercially successful wind farms while maximising the support from local communities. Its wind farm projects have the potential to play a fundamental role in a green economy by creating jobs in rural areas and growing a green industrial sector, while also funding local development for host communities.

SSE Renewables is a leading developer, owner and operator of renewable energy in Ireland with a vision to make renewable energy the foundation of a zero-carbon world. The renewable electricity generated at wind farms operated by SSE Renewables across Ireland powers SSE Airtricity, Ireland's largest provider of 100% green energy.

The company's onshore portfolio in Ireland comprises 29 windfarms producing nearly 700MW of renewable generation, including Ireland's largest wind farm the 174 MW Galway Wind Park.

1.3 The Planning Application

The Planning Application includes all of. the components (of the Proposed Development see Chapter 4: Description of Development of this EIA Report) but excludes the Turbine Delivery Route. The full extent of the Planning Application can be found in the statutory notices.

1.4 Proposed Development Site

'The Proposed Development Site' is an area of land encompassing all the proposed infrastructure associated with the Proposed Development. The Proposed Development is assessed within this EIAR.



The Proposed Development Site is centred on Grid Reference W 19846 83148 and occupies an area of approximately 765ha, (shown bounded by the red line on Figure 1-1a).

The Proposed Development is located on land at Clydaghroe and Cummeenabuddoge, Clonkeen, almost entirely within County Kerry, although a proportion of the grid connection cabling is proposed within County Cork.

The land use with the Proposed Development is commercial forestry with a proportion of the grid route passing through farmland.

The nearest settlements are Ballyvourney and Millstreet (both in County Cork) located approximately 5km south of and 7km north east of the Site respectively.

The topography of the Proposed Development Site inclines from a low point of approximately 300m AOD in the southeast boundary of the Proposed Development Site to approximately 520m AOD along the north western boundary.

Details of the conditions at the Proposed Development Site are provided as part of the baseline description within each technical chapter.

1.4.1 Connection to the National Grid

It is proposed to connect to the national electricity grid via a 110kV underground cable from the proposed onsite substation to the existing Ballyvouskill 220/110kV substation. The grid connection cabling route from the proposed on-site substation will measure approximately 3.5km in length. The grid connection cabling route forms part of the Proposed Development, the subject of the planning application, and is assessed in this EIAR.

The connection to the National Grid is shown on Figure 1-2e.

1.4.2 Site Access and Turbine Delivery Route

Access to the site, for construction and operation (including Heavy Goods Vehicles (HGV) and abnormal loads (such as turbine blades)) will be via the existing Coillte CGA site entrance currently used for forestry operations, in the west of the site, off a local access road which in turn is accessed from the National Road N22.

The proposed turbine delivery route is from Ringaskiddy Port, County Cork, onto the N28, N40, N22, and then onto the local road to the Site entrance (NGR W 14106 81485).

1.4.3 Statutory Designations

The Site does not lie within any areas designated for ecological or nature conservation interest. However, the Site immediately adjoins and drains directly into the Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment Special Area of Conservation (SAC).

The Proposed Natural Heritage Area (PNHA) of Mullaghanish Bog is directly south of the Site.

The Mullaghanish to Mushera Mountains Special Protection Area (SPA) is within 600m to the east and south of the Site. Hen Harriers are the qualifying interest.



The Proposed Development Site land is designated as a Visually Sensitive Area (to wind development (see Figure 6-1 (Chapter 6 of the EIAR)) by Kerry County Council as part of the County's Development Plan (2022b).

A Site Context Plan can be found in Figure 1-4 which provides an overview of existing designated sites, the proposed wind farm and dwellings.

1.5 Proposed Development Overview

The Proposed Development assessed within this EIAR comprises the following:

- 17 wind turbines and associated hardstand areas;
- The range / value of turbine dimensions are as follows:
 - a total tip height in the range of 199.5m minimum to 200m maximum inclusive;
 - hub height in the range of 118m minimum to 125.5m maximum inclusive; and
 - rotor diameter in the range of 149m minimum to 163m maximum.
- Each turbine will be capable of generating 6 MW to 7.2 MW inclusive, with an overall installed capacity ranging from a minimum of 102MW up to a maximum 122.4MW;
- One 110kV permanent electrical substation including a control building with welfare facilities, electrical plant and equipment, security fencing, underground cabling, wastewater holding tank and ancillary structures and associated works;
- Underground electrical and communication cabling connecting the wind turbines to the proposed on site substation and associated ancillary works;
- 110kV Underground cabling between the new permanent substation to the existing 220/110kV Ballyvouskill Substation to facilitate export of electricity to the National Electricity Grid;
- One Meteorological Mast of 110m in height and associated hardstand area to be removed at the end of the operational period;
- New permanent access tracks and permanent upgrades to existing tracks, roads and site access;
- Four borrow pits;
- Six permanent peat and spoil repository areas;
- Permanent placement of peat and spoil along sections of site access roads where appropriate as part of the peat and spoil management plan for the site;
- Three temporary construction compounds;
- Site drainage;
- Keyhole forestry felling to accommodate the construction and operation of the proposed development;
- Localised temporary works along the turbine delivery route in County Cork to facilitate the delivery of turbine components (namely temporary street furniture removal and vegetation clearance).
- Health and safety signage, information signage, and direction signage; and
- All other associated site development including upgrades to the roads offsite (Chapter 7) to facilitate the delivery of abnormal loads and works to facilitate the



construction and operation of the Proposed Development over an operational lifespan of 35 years, including necessary earthworks.

A detailed description of the Proposed Development is contained in Chapter 4 of this EIAR. and shown on Figures 1-2a to 1-2e.

1.6 Purpose of the EIA Report

This EIAR presents the findings of the EIA process by describing the Proposed Development, the current conditions at the Proposed Development Site and receiving environment and the likely environmental effects which may result from the construction, operation and decommissioning of the Proposed Development.

Where appropriate, mitigation measures designed to avoid, reduce or offset potentially significant effects are proposed and residual effects (those effects that are expected to remain following implementation of mitigation measures) are presented.

As required by the EIA Directive, the findings and conclusions of the EIA are summarised in a standalone, easily accessible, Non-Technical Summary (NTS). This enables anyone with an interest in the Proposed Development to understand and access information on its potential environmental effects.

The EIA is the assessment carried out by the competent authority, which includes an examination that identifies, describes and assesses in an appropriate manner, in the light of each individual case and in accordance with Articles 4 to 11 of the Environmental Impact Assessment Directive, the direct and indirect significant effects of the proposed development on the following:

- Population and Human Health;
- Biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC;
- Land, Soil, Water, Air, Climate;
- Material Assets, Cultural Heritage and the Landscape; and
- Interactions between these factors.

Table 1-1 below shows where these factors have been addressed in this EIAR.

Table 1-1: Relatio	nship of EIAR	Chapters to	EIA Directive	Requirements
--------------------	---------------	-------------	---------------	--------------

EIA Directive Factor	EIAR Chapter
(a) Population and Human Health	Chapter 5: Population and Human Health Chapter 6: Landscape and Visual Amenity Chapter 13: Noise Chapter 15 Shadow Elicker
(b) Biodiversity, with particular attention to species and habitats protected under the Habitats and Birds Directives	Chapter 8: Biodiversity Chapter 9: Ornithology
(c) Land, Soil, Water, Air and Climate	Chapter 8: Biodiversity; Chapter 10: Soils, Geology and Hydrogeology Chapter 11: Hydrology, Water Quality and Flood Risk Chapter 12: Air and Climate



EIA Directive Factor	EIAR Chapter
(d) Material assets, Cultural Heritage and the Landscape	Chapter 6: Landscape and Visual Amenity Chapter 7: Traffic Impact and Access Route Assessment Chapter 14: Cultural Heritage and Archaeology Chapter 16: Material Assets (Including Aviation and Telecommunications)
 (e) the interaction between the factors referred to in points (a) to (d) 	Chapter 18: Interactions of the Foregoing

1.7 EIA Screening

The Proposed Development exceeds the thresholds for completion of an Environmental Impact Assessment (EIA), as detailed in the Planning and Development Regulations 2001 (as amended), Schedule 5, Part 2, Class 3(i).

As such, it is not proposed to provide a report on the screening requirement for an EIA but to proceed on the basis of considering the potential effects of the wind farm development through the process of Environmental Impact Assessment. As such the Planning Application is accompanied by this EIAR.

The scope of the EIA was determined through the responses from the Scope of Works report that was issued to 52 consultees in August 2021. This is detailed further in Chapter 2: EIA Approach and Methodology.

1.8 The EIA Team

The EIA was undertaken by Atmos Consulting with assistance from specialist consultants listed in Table 1-2. All are suitably qualified and competent experts in their field, as is required under the EIA Regulations. A Statement of Competency of the Specialists who wrote each Chapter are included in text of each Chapter.

Atmos Consulting has been involved in the development of projects and planning applications since 2007 having successfully managed EIA and planning applications for c.670MW of onshore wind and currently leading the planning process for a further 1GW. Atmos' staff includes a team of specialist EIA Practitioner delivering Environmental Impact Assessments for large and small scale Windfarms.

Atmos operates a multi-tiered review and approval system for undertaking EIAs which requires all assessments to be reviewed by senior experts in the relevant field to ensure technical correctness, the Atmos Project Manager for compliance with project parameters and EIA legislation and guidance and the Atmos Project Director for quality assurance.

All work is undertaken in accordance with Atmos ISO 9001 accredited Quality System.

EIA Subject	Specialist
Introduction and Background	Atmos Consulting
EIA approach and Methodology	
Design Evolution and consideration of Alternatives	
Description of Development	
Population and Human Health	

Table 1-2: EIA Team



EIA Subject	Specialist
Biodiversity	
Ornithology	
Population and Human Health	
Shadow Flicker	
Material Assets	
Telecommunications & Aviation	
Risks and Major Accidents	
Interactions of the Foregoing	
Schedule of Mitigation	
Air and Climate	
Description of Development	Gavin and Doherty Geosolutions (GDG)
Health and Safety	
Reasonable Alternatives	
Turbine Delivery Route Evaluation	
Soils, Geology and Hydrogeology	
Peat Stability Risk Assessment	
Planning and policy	Fionna O Regan
Hydrology, Water Quality and Flood Risk	McCloy Consulting
Landscape and Visual	Brindleys Associates
Traffic and Transport	SYSTRA
Noise	Hayes McKenzie
Cultural and Archaeological Heritage	Rubicon Heritage Services
Forestry	The Forestry Company
Preliminary Route Assessment	Collett & Sons Limited
Kerry Slug Method Statement	APEM
Telecoms Impact Study	AiBridges
Aviation Review Statement	
Civil & Structural Due Diligence Report	Punch Consulting Engineers

The following Atmos personnel were involved in the overall management and delivery of the EIA:

Malcolm Sangster BSc (Hons) Chemistry MSc Environmental Chemistry, overall Project Director. Malcolm has 27 years' experience in environmental management including 15 years in delivering consents and EIAs for energy projects. This includes a diverse technical knowledge and experience of managing and directing complex projects.

Since 2020 Malcolm has directed 15 large and small scale Windfarm projects including overseeing the delivery of full EIARs and consent applications at both National and local Scale.

Richard Newsham BSc (Hons) Geography and Natural Hazard Management and Prince2 Practitioner, original Project Manager. Richard Managed the preparation of the EIAR from inception to leaving Atmos in June 2023. Richard has over 6 years in the renewable energy industry, including 3 years as an EIA Project Manager and 1 year as a renewable energy developer.

Richard's experience includes the management and delivery of large scale wind consent applications including the management of the entire EIA process from initial screening and scoping to the submission of the completed EIAR.



Ruadh McIntosh BSc Geology and Physical Geography. Current Project Manager. Ruadh is a Senior Engineering Geologist working in both the GDG Geo-Environmental team and the Onshore Renewables team.

She is a Chartered Geologist with the Geological Society of London and has been working in consultancy for over 7 years. Ruadh has worked on a variety of renewables projects in a multidisciplinary capacity, with a focus on project management, geological assessment and borrow pit appraisal;

Tom Hartley MSc Geographical Information Systems, BSc (Hon)s Geosciences. Project GIS and Visualisation lead. Tom has fifteen years' experience in the production, analysis and management of geographical data within the onshore wind sector using a variety of GIS platforms. He has extensive theoretical and technical knowledge of GIS in a variety of placements in both the public and private sectors.

Since joining Atmos in 2007, Tom has been involved in the development of an awardwinning GIS that incorporates geographical data modelling, site search, data management and visualisation. He manages the Atmos Consulting GIS team and has been responsible for the analysis and production of figures supporting the submission of over 100 onshore wind planning applications.

Katie Macintyre MSc Geographic Information Science and Cartography, BSc Ecology and Wildlife Conservation, GIS and mapping Support.

Katie has 9 years' experience in GIS and IT, providing GIS support to an environmental consultancy team, and conceptualising, building, and maintaining bespoke solutions to improve efficiency within teams, as well as client-facing solutions for a range of users including central and local government personnel.

Katie is adept at performing a range of GIS analyses and producing high quality output for internal and external clients.

Jack Graham. MSc Environmental Management (Energy), Assistant Project Manager. Jack has 2 years' experience in supporting the delivery of ElAs for onshore windfarm projects including assisting in the preparation of ElA chapters, overseeing the delivery of technical assessments and assisting in the co-ordination and delivery of ElARs.

1.9 Additional Documents

1.9.1 Planning Statement

The planning application is accompanied by a Planning Statement which provides an assessment against the relevant International, National, Regional and Local Planning and Energy Policies and is intended to be read alongside this EIAR.

1.9.2 Natura Impact Statement

The planning application is also accompanied by a Natura Impact Statement (NIS)). This is an assessment of the likely or possible significant effects of the Development on sites designated as Natura 2000 conservation areas, also defined in Irish legislation as "European sites". It is provided to inform the Board's appropriate assessment under article 6(3) of the EU Habitats Directive (92/43/EEC).



1.10 Public Consultation

In November 2020, at an early stage, the project appointed a local Community Liaison Officer (CLO). The role of a CLO is to introduce and communicate key project information, timelines, updates, activities, benefits and proposals through direct and indirect community engagement, meetings and events with the proposed Cummeennabuddoge Wind Farm's near neighbours and the wider community throughout the project lifecycle.

Initially, the CLO's direct engagement focused on calling to houses within 2km of the project area with the distribution of an introductory letter in December 2020.

Engagement was extended out to 4km thereafter for Newsletter 1 in July/August 2021, a project update letter in February 2022, Newsletter 2 in April 2022, Newsletter 3 in September 2022 and a project update letter in March 2023.

During May 2022, FuturEnergy Ireland sponsored and arranged a Climate Change Education Programme for five local national schools. In October/November, a further two schools took part in the programme. The schools are all located around the project area and the programme, STEAM Education's Climate-Action-in-a-Box, received very positive feedback.

In August 2023, our communications manager sent a media release to local and regional journalists launching Cummeennabuddoge Wind Farm's detailed project brochure and Virtual Exhibition. In tandem, a detailed 44-page project brochure, and a letter with details of the Virtual Exhibition and a request to participate in the engagement process, was distributed to the projects near neighbours and wider community out to 4km, interest groups and local elected representatives in both Co Cork/Kerry.

In September 2023, the CLO delivered an invitation letter to a two-day on-site community engagement clinic to houses within 4km of the project area. This was either emailed/delivered/posted to interest groups and local elected representatives in Co. Cork and Co. Kerry to keep them informed and up to date. In tandem, advertisements for the clinic were placed in the local and regional newspapers while posters were put up in local public places and posted on the local community Facebook page.

Our intention during September 2024 is to distribute a "notice to submit into planning" letter to houses out to 4km of the project area. In tandem, advertisements giving notice of the planning submission will be placed in local and national newspapers. Site notices will also be erected around the proposed project.

Early in the engagement process, the CLO contacted and kept local interest groups from the wider community and local elected representatives in Co. Cork and Co. Kerry up to date and informed. This commitment has continued throughout the engagement process and will continue to do so throughout the project's lifecycle.

The CLO was on hand to discuss any queries and take feedback, comments or concerns that residents may have had back to the project team to respond. Some information requests were logged so that when the information became available it would be provided.



The CLO's work included Saturdays and some evenings in an effort to meet residents unavailable during weekdays in an effort to reach out to all.

At all stages of the project's engagement cycle from 2020 to 2024, all our communications material included our contact number, project email, postal address, and dedicated project website <u>www.cummeennabuddogewindfarm.ie</u> (when launched). All project updates and newsletters were continuously uploaded to the dedicated project website.

To acknowledge the region's proximity to the Gaeltacht, the majority of our communications were provided in both Irish and English.

To reinforce the public consultation programme FuturEnergy Ireland and SSE Renewables organised two Public Information Days (PIDs) to provide an opportunity for the local community and local elected representatives from Co Cork and Co. Kerry to meet the project team, view the proposals and discuss the proposed Cummeennabuddoge Wind Farm.

1.10.1 Public Information Days (PIDs)

The PIDs were held as part of the public consultation process, on September 20 and September 21, 2023, at the Abbey Hotel, Ballyvourney, Co. Cork, P12 FW30, a venue close to the site and easily accessible to local residents. The public consultation events took place September 20, 12:00-20:00, and September 21, 11:00-18:00, to give as many community members as possible the chance to attend.

A Pre-Application Community Consultation (PACC) Report has been submitted to the Board as a standalone document as part of this planning application. The PACC Report summarises the engagement and consultation that has taken place with the local community to date, from project launch to this planning application. It includes PID reports, a long-term community engagement plan and how comments received have been considered and addressed in the project.

1.10.2 Informing the Public and Local Residents

Between 2020 and 2024, this was achieved by having a local dedicated CLO who is easily contactable and available allocated to the project to keep near neighbours, local interest groups, the wider community and local elected representatives up to date and informed. The following materials kept all parties mentioned above updated: a project introduction letter, newsletters 1,2 and 3, two project update letters, a dedicated project website, a 44-page brochure, a Virtual Exhibition, a clinic invitation letter, media releases, advertisements, locally placed posters, sponsored school education programmes, a two-day local engagement clinic (PID) and a "notice to submit" letter.

Further information can be found in Technical Appendix 1-2 Community Engagement Report.



1.11 Need for the Development

1.11.1 Summary

The Proposed Development offers the potential to:

- Diversify Ireland's energy sources, to achieve national renewable energy targets;
- Reduce Ireland's dependency on fossil fuels resulting in lower carbon dioxide (CO₂) emissions;
- Increase Ireland's national energy security;
- Increase Ireland's contribution to wider EU renewable energy goals;
- Aid in the acceleration of actions towards the goals of the Sharm el-Sheikh Implementation Plan and the Breakthrough Agenda (COP27); and
- Increase energy price stability in Ireland by reducing an over-reliance on imported gas and exposure to international market price and supply fluctuations.

The need for the Development is discussed in the accompanying Planning Statement.

1.11.2 The Climate Action Plan 2023

The Climate Action Plan 2023 aims to evaluate the changes that are required in order;

"...to halve our emissions by 2030 and reach net zero no later than 2050, as we committed to in the Programme for Government".

The Plan recognises that increasing the proportion of renewable electricity generation is among the most important measures to reach this target and includes a commitment to increase the proportion of renewable generation to 80% by 2030, which includes increasing the target for onshore wind energy to 9GW (6GW by 2025).

The Proposed Development has the potential to contribute significantly to this target through the size of its generation potential and the ability of onshore wind to be delivered within relatively short timescales.

1.11.3 The Renewable Energy Directive (recast) 2018/2001/EU

The Renewable Energy Directive (recast) 2018/2001/EU entered into force in December 2018 and was transposed into Irish Iaw in September 2020 by the Renewable Energy Regulations 2020.

The Regulations set the parameters for the establishment of future renewable electricity support schemes, and build on the existing regime, which was created by the European Union (Renewable Energy) Regulations 2014 (as amended). The ambition of increased electricity from renewable sources will be significantly strengthened.

Ireland is facing significant challenges in efforts to meet these targets, alongside its commitment to transition to a low carbon economy by 2050. Ireland did not meet its 2020 target for renewable energy.

The European Commission has recommended that an amendment be made to this Directive which would recognise renewable energy as an 'overriding public interest'.



1.11.4 Revised Renewable Energy Directive EU/2023/2413

The Revised Renewable Energy Directive (RED III) entered into force on 20 November 2023.

Whilst RED II had set a binding overall Union target to reach a share of at least 32% of energy from renewable sources in the Union's gross final consumption of energy by 2030. RED III increases this target to 42.5 %. Additionally, the Directive obliges EU Member States to;

"...collectively endeavour to increase the share of energy from renewable sources in the Union's gross final consumption of energy in 2030 to 45 %" (Article 3, paragraph 1).

The associated recital (Recital 5) provides useful context:

"The REPowerEU Plan set out in the Commission communication of 18 May 2022 (the 'REPowerEU Plan') aims to make the Union independent from Russian fossil fuels well before 2030. That communication provides for the front-loading of wind and solar energy, increasing the average deployment rate of such energy as well as for additional renewable energy capacity by 2030 to accommodate the higher production of renewable fuels of non-biological origin. It also invited the co-legislators to consider establishing a higher or earlier target for the increased share of renewable energy in the energy mix. In that context, it is appropriate to increase the overall Union renewable energy target to 42,5% in order to significantly accelerate the current pace of deployment of renewable energy, thereby accelerating the phase-out of the Union's dependence on Russian fossil fuels by increasing the availability of affordable, secure and sustainable energy in the Union. Beyond that mandatory level, Member States should endeavour to collectively achieve an overall Union renewable energy target of 45 % in line with the REPowerEU Plan."

1.11.5 REPower EU Energy Plan 2022

The European Commission presented the REPower EU plan as a key pillar in the EU's response to the disruption which has been caused to energy markets and aims to tackle the climate crisis by transforming Europe's energy system.

Within the overarching goals of strengthening Europe's climate ambitions, security and economic growth, the REPowerEU plan responds to the current energy situation in four ways:

- Energy savings;
- The diversification of energy imports;
- The acceleration of Europe's clean energy transition; and
- Smart investment.

The REPower EU Plan also addresses energy security issues emerging from Russia's invasion of Ukraine. The EU intends on significantly accelerating its transition to clean energy and thereby increasing Europe's energy independence.



1.12 Viewing the EIA Report

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

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

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

- An Bord Pleanála, 64 Marlborough Street, St. Rotunda, Dublin 1, D01 V902;
- The Offices of Kerry County Council, County Buildings, Ratass, Tralee, Co. Kerry, V92 H7VT; and
- The Offices of Cork County Council, Ground Floor, County Hall, Carrigrohane Road, Cork, T12 R2NC.

The EIAR will also be available to view online on its dedicated SID website: <u>https://cummeennabuddogeplanning.ie/</u>

The EIAR will also be available to view online via the Department of Housing, Local Government and Heritage's EIA Portal, which will provide a link to the Department's website on which the application details are contained. (https://www.housing.gov.ie/planning/environmental-assessment/environmental-impact-assessment-eia/eiaportal)



1.13 References

European Council (EC) (1985). Directive on Environmental Assessment (85/337/EEC) as amended by Directive 97/11/EC and Directive 2014/52/EU. European Union, Brussels. [Online]Available at <u>https://www.opr.ie/wp-content/uploads/2019/08/2018-Environmental-Impact-Assessment-1.pdf</u>. Accessed 29 September 2022

European Commission (1992) (2009) - The Habitats Directive - Directive 92/43/EEC and
Directive 2009/147/EC.[Online]Available at
https://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htmAccessed 29 September 2022

European Commission (2001) - Guidance on ElA Scoping'' (EU 2001). [Online]Available at <u>https://ec.europa.eu/environment/archives/eia/eia-guidelines/g-scoping-full-</u> text.pdf. Accessed 29 September 2022

European Commission (2022) - REPower EU Energy Plan 2022 - The European Commission presented the REPower EU plan. [Online]Available at https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-

<u>deal/repowereu-affordable-secure-and-sustainable-energy-europe en</u>. Accessed 29 September 2022

European Council (EC) (2009) - Renewable Energy Directive (2009). [Online]Available at <a href="https://eur-htttps

<u>lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:140:0016:0062:en:PDF</u>. Accessed 29 September 2022

European Council (EC) (2018) - The Renewable Energy Directive (recast) 2018/2001/EU.[Online]Availableathttps://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018L2001.Accessed 29 September 2022

European Council (EC)(2023) Directive (EU) 2023/2413 of the European Parliament and of the Council of 18 October 2023 amending Directive (EU) 2018/2001, Regulation (EU) 2018/1999 and Directive 98/70/EC as regards the promotion of energy from renewable sources, and repealing Council Directive (EU) 2015/652. [Online] Available at: https://eur-lex.europa.eu/legal-

<u>content/EN/TXT/?uri=CELEX%3A32023L2413&qid=1699364355105</u> Accessed 4 December 2023

Government of Ireland (2021) - *The Climate Action Plan 2021*. [Online]Available at <u>https://www.gov.ie/en/publication/6223e-climate-action-plan-2021/</u>. Accessed 29 September 2022

Irish Statute Book, Office of The Attorney General (2021) – Climate Action and Low Carbon Development (Amendment) Act 2021. [Online]Available at https://www.irishstatutebook.ie/eli/2021/act/32/section/15/enacted/en/html. Accessed 29 September 2022

Irish Statute Book, Office of The Attorney General (2001) – Planning and Development Regulations 2001 (as amended) Schedule 5, Part 2, Class 3(j). [Online]Available at https://www.irishstatutebook.ie/eli/2001/si/600/made/en/html. Accessed 29 September 2022