MWP

Planning Statement

Brittas Wind Farm

Brittas Wind Farm Limited

December 2024

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MWP, Engineering and Environmental Consultants
Address: Park House, Bessboro Road, Blackrock, Cork, T12 X251
www.mwp.ie

1. Introduction

This Planning Statement has been prepared by MWP, on behalf of Brittas Wind Farm Limited (the applicant), to accompany a Strategic Infrastructure Development (SID) planning application for a proposed Wind Energy project. The wind farm site is located within the townlands of Brittas, Rossestown, Clobanna, Brownstown, Killeenleigh, Kilkillahara, Brittasroad, Coolgarrane, Athnid More, Cassestown, Laghtagalla, Farranreigh, Furze, Loughlahan, Ballygammane, Co. Tipperary.

The main components of the proposed project include:

- The Wind Farm Site which includes ten (10) wind turbines, associated tracks and infrastructure, an on-site 110kV electrical substation and a Grid Connection Route (GCR) which consists of an underground electrical grid connection from the Wind Farm Site to the existing Thurles 110kV substation.
- A Turbine Delivery Route (TDR) which is the route between the Port of Foynes and the Wind Farm Site along which turbine components will be transported. This will include temporary accommodation works along the public road to allow for the delivery of wind turbine components.

MWP commenced pre-application consultations with An Bord Pleanála on the 23rd of January 2023 and a pre-application meeting was held on the 5th of May 2023. On the 8th of May 2024, the board concluded the pre-application process and issued its opinion that the proposed development would be Strategic Infrastructure and that an application for approval should be made to them under 37E of the Planning and Development Act 2000, as amended.

This report provides a concise overview of the planning merits of the proposed development. The purpose of this planning report is to provide details which will assist An Bord Pleanála in determining whether the proposed development is in accordance with the proper planning and sustainable development of the area, and accordingly whether planning permission should be granted for the proposed development. The report is set out as follows:

- Section 2: Application Site - This section provides a description of the site, its context, and the relevant planning history.
- Section 3: Description of proposed development - This section describes the proposal.
- Section 4: Planning Policy Context – This section outlines the national, regional and local planning policies relevant to the application site and proposed development.
- Section 5: Planning Assessment – This section provides an assessment of the principle of development and other relevant considerations.
- Section 6: Conclusion - This section summarises the key points set out in the report.

This Planning Report comprises part of a suite of application documents, which also includes an Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS). All documents should be read in conjunction in order to have a full understanding of the nature, location and extent of the proposed development.

Other elements of the project which are assessed throughout the EIAR but are not the subject of this SID planning application are as follows:

- Battery Energy Storage Facility (BESS)

- Rerouting of on-site ESB 38kV overhead powerline (OHL)
- Accommodation works along the turbine delivery route which includes temporary removal of traffic signs and lights, electricity poles, bollards and lamp posts, fences, hedge and tree removal/trimming, land take, and road widening.

Separate planning applications for the BESS and re-routing of the Eirgrid OHL will be prepared and lodged with the Tipperary County Council (TCC) after planning permission has been obtained for the main windfarm project. Consent will also need to be obtained from ESB.

2. Application Site

2.1 The Site and Environs

The area within the proposed site boundary is approximately 331.98ha. The proposed Wind Farm site is located in a rural area 3Km north of Thurles Town, within the townlands of Brittas, Rossestown, Clobanna, Killeenleigh, Brownstown, and Kilkillahara. The site mainly comprises of agricultural fields bounded by hedgerows and treelines. An area of broadleaf forestry is located within the southwest portion of the site. The River Suir transects the site from north to south. The N62 is located west of the site, running north to south, connecting Templemore to Thurles. The N62 provides a link to the M6, M7 and M8 motorways. The L8017 local road traverses the centre of site from east to west, crossing the River Suir at a bridge point.

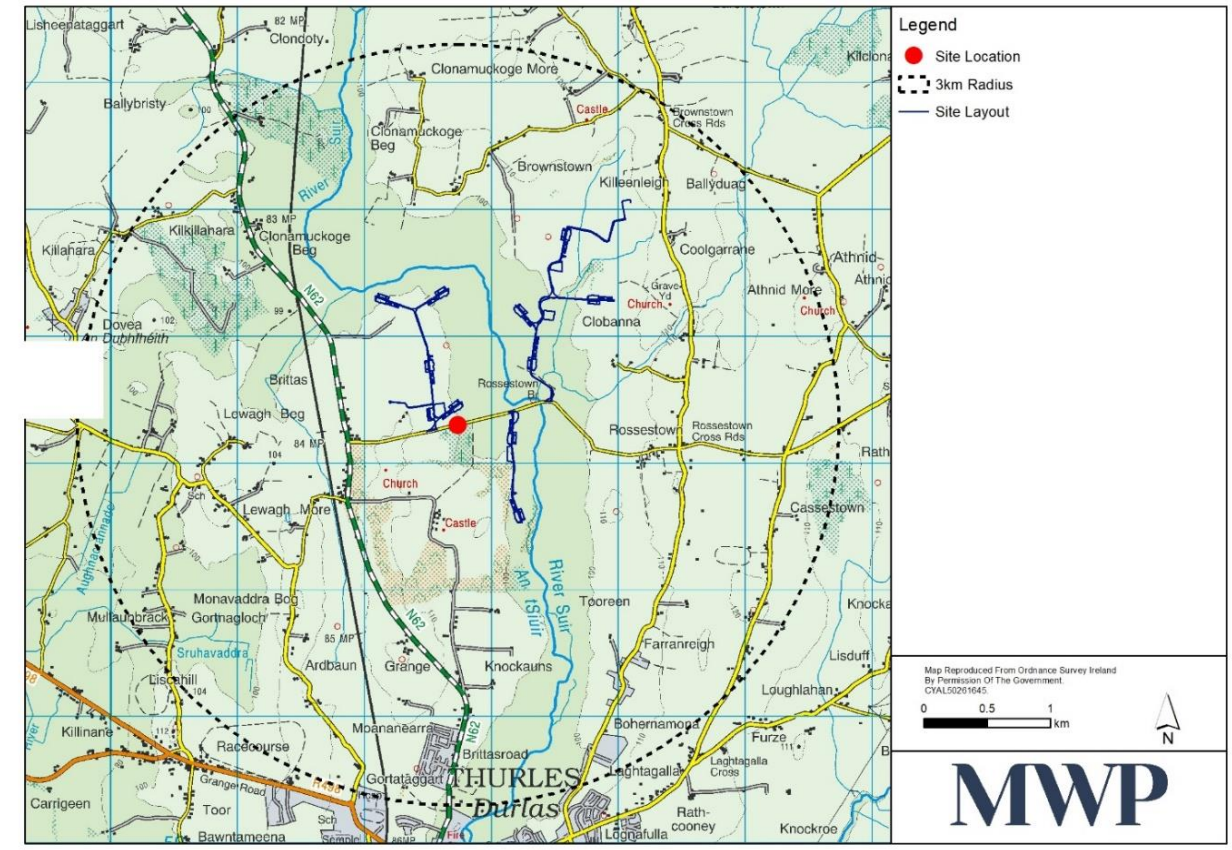

Figure 1- Site Location Map of the Proposed Wind Farm Site

The proposed Grid Connection Route (GCR) is located within the public road between the Wind Farm site and the existing Thurles 110kV Substation within the townlands of Killeenleigh, Coolgarrane, Clobanna, Athnid More, Rossestown, Cassestown, Farranreigh, Laghtagalla, Furze, Loughlahan and Ballygammane (see Figure-2). The Turbine Delivery Route (TDR) runs from the Port of Foynes in County Limerick to the Wind Farm Site via the national, regional and local road network. The small section of land in Thurles town needed for the accommodation works for the Turbine Delivery is located in the townland of Brittasroad. A second section of land is required for accommodation works at the junction of the N62 and L8017 in the townland of Brittas.

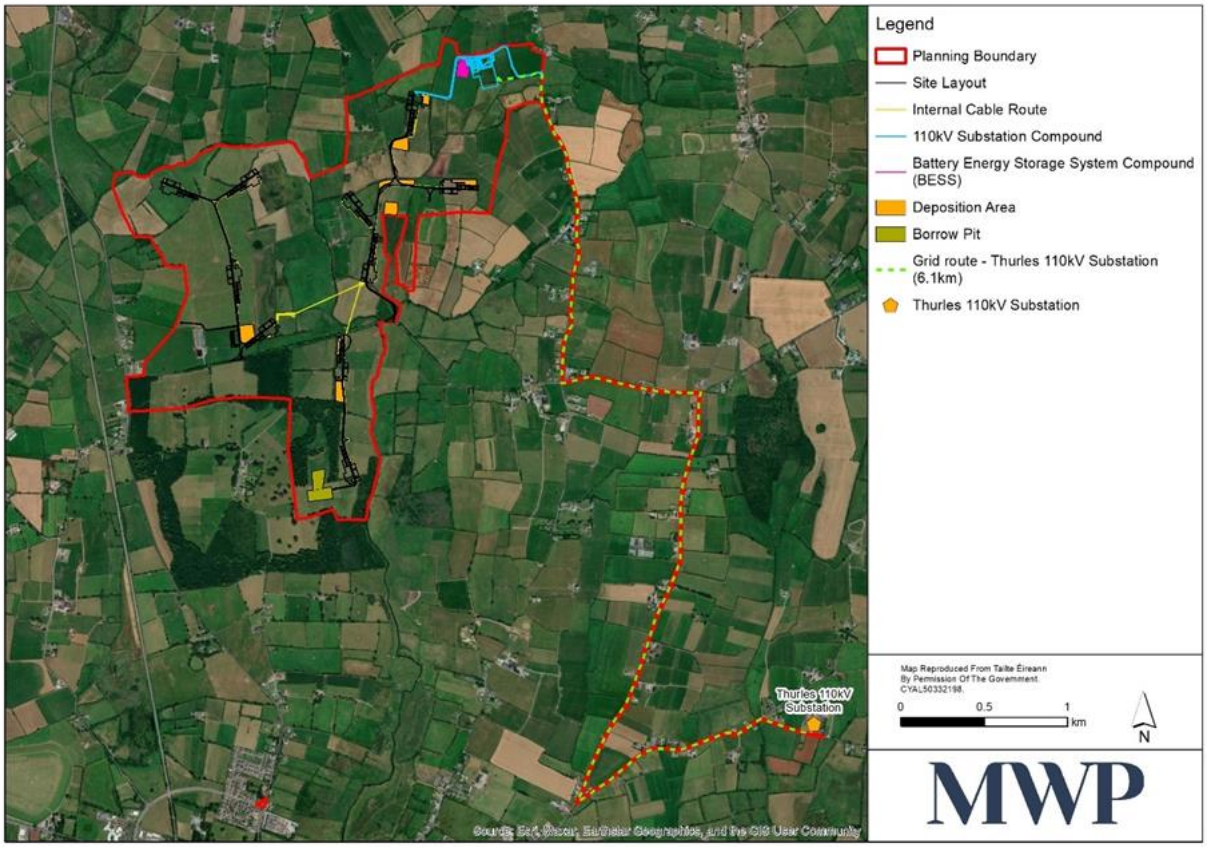

Figure 2- Overall Wind Farm Project Site

2.2 Planning History

The following table outlines the planning history relating to the proposed development site.

Table 1- Planning History Table

Planning Ref.	Description	Location	Planning Authority Decision
Tipperary County Council Ref- 08511136	Overhead 38kV line from Thurles 110kV station in the townland of Ballygammane to the proposed Borrisoleigh 38kV station in the townland of Coolataggle	Ballygammane, Coolataggle, Co. Tipperary	Granted with conditions on 12/03/2009
Tipperary County Council Ref- 18600549 ABP Ref- ABP-302609-18	The erection of a 36 metre high multi-user lattice telecommunications structure, carrying antenna and dishes enclosed within a 2.4 metre high palisade fence compound with associated ground equipment cabinets, creation of new entrance access track and site works	Brittas Td, Thurles, Co. Tipperary	Granted with conditions on 27/08/2018 Permission modified following an appeal to ABP on 01/02/2019
Tipperary County Council Ref- 2460421 ABP Ref- ABP-320550-24	The continued use of an existing temporary 80m high lattice type meteorological mast and associated instruments in the townland of Brittas, near Thurles Co. Tipperary. The structure is fixed to ground mounted anchors by guy wires and includes instruments to measure local meteorological conditions. The mast was erected on site in April 2023 as exempted development pursuant to Class 20(A), Part 1, Schedule 2 of the Planning and Development Regulations 2001 (as	Brittas, Thurles, Co. Tipperary	Granted with conditions on 18/07/2024 Currently appealed to ABP

Planning Ref.	Description	Location	Planning Authority Decision
	amended). Permission is sought for a further period of two years		

2.3 Designation

The Tipperary Renewable Energy Strategy constitutes Volume 5 of the Tipperary County Development Plan 2022-2028. Tipperary's Wind Energy Strategy (WES) forms part of Appendix 1 of this strategy. A key priority of this WES was to identify sites of strategic regional and national importance which have the potential to accommodate wind energy development. The WES identifies the optimum locations for wind energy developments in the county having regard to environmental and geographical constraints and the protection of the amenities of local residents.

The WES designated areas are as follows:

- Areas unsuitable for new wind energy developments
- Areas open to consideration for new wind energy developments

The proposed Wind Farm is located within an area designated as 'Open for Consideration" for new wind energy developments. It is the policy of the Council to assess new wind energy development in accordance with the associated wind energy strategy map and the following parameters:

Areas 'Open for Consideration' – wind energy development in these areas may or may not be appropriate, depending on the character of the landscape and the potential impact of the proposed development. Any impact on the environment must be low and subject to proper planning and sustainable development, and the guidelines set out in this policy document.

A minor section of the Grid Connection Route (GCR) lies within an area designated as being "unsuitable for new wind energy development". The GCR is considered to be an electricity transmission development opposed to a wind energy development and therefore this designation does not apply. The GCR is primarily underground and there will therefore be no impact on the surrounding environment once operational.

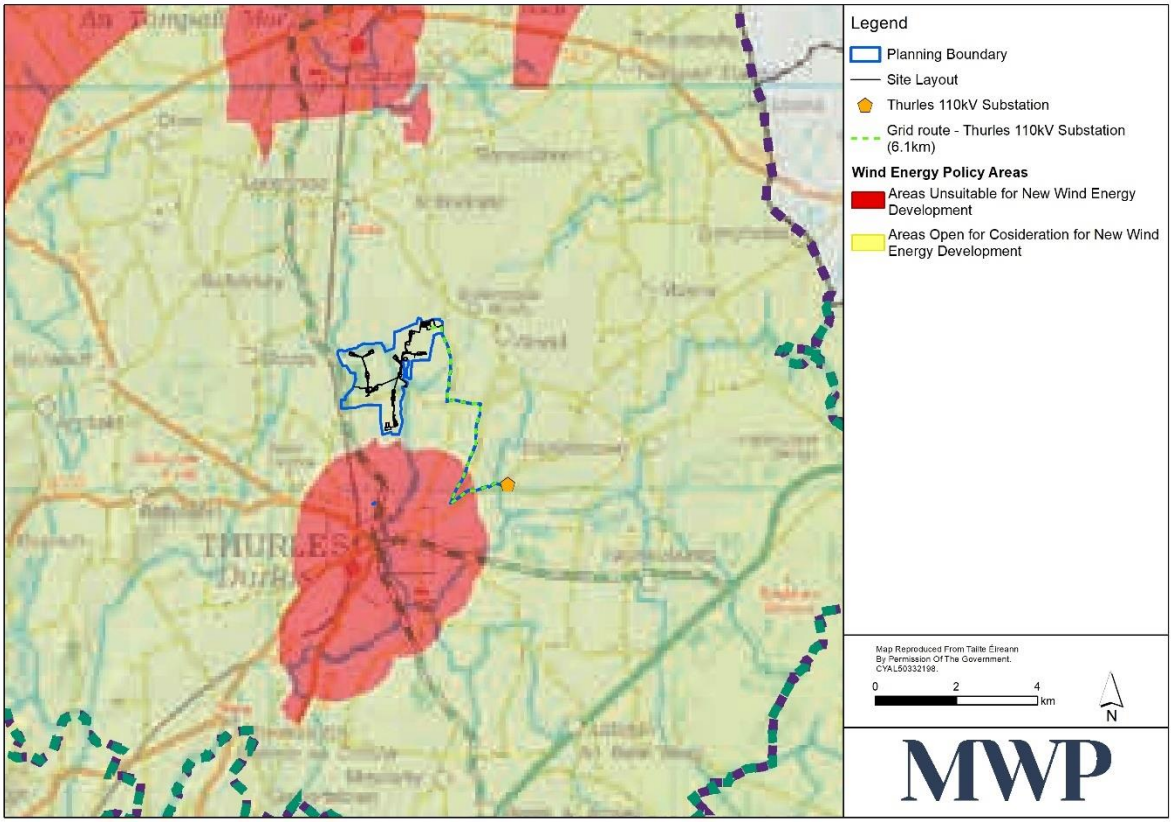

Figure 3- Wind Energy Designation (Tipperary County Development Plan 2022-2028)

3. The Proposed Development

The development for which planning permission is sought in the planning application (the proposed development) will include the following:

- 10 No. Wind Turbines with a blade tip height of 180m, hub height range from 102.5 to 105.5m and a rotor diameter range from 149m to 155m;
- 10 No. Wind Turbine foundations and Hardstand areas and associated drainage infrastructure;
- 1 No. Permanent Lidar unit and associated foundation, hardstand area and compound for Meteorological Monitoring;
- 1 No. 110kV Electrical Substation including 2 No. control buildings, electrical plant and equipment, welfare facilities, carparking, water and wastewater holding tanks, security fencing, lightening protection and telecommunications masts, security cameras, external lighting and, all associated infrastructure;
- Installation of medium voltage underground electrical and communication cabling connecting the wind turbines to the proposed onsite substation and associated ancillary works;
- Installation of approximately 7km of underground electricity and communication cabling between the proposed onsite substation and the nearby existing Thurles 110kV substation in the townland of Ballygammane, Co. Tipperary. The cabling will be laid primarily within the public road and will connect the proposed wind farm to the national grid;

- 4 No. Site Entrances from the public road and associated fencing and signage;
- Construction of new permanent site access tracks, turning heads and associated drainage infrastructure;
- The upgrading of existing access tracks and associated drainage infrastructure;
- 2 No. Temporary construction site compounds and mobile welfare facilities;
- 1 No. Borrow pit and associated drainage infrastructure to be used as a source of stone material during construction;
- Spoil deposition areas;
- Associated surface water management systems;
- Tree felling and hedgerow removal to accommodate wind farm infrastructure;
- Temporary accommodation works at 2 no. locations adjacent to the public road to facilitate delivery of turbine components to site within the townlands of Brittas and Brittasroad, Co. Tipperary. The works primarily relate to trimming and clearing of vegetation, temporary removal of street furniture and fencing, and installation of temporary stone hard standing; and
- All related site works and ancillary development;

The applicant is seeking a ten-year permission and an operational period of no less than 35 years from the date of commissioning of the entire Wind Farm.

Figure 4- Proposed Wind Farm Site Layout Plan

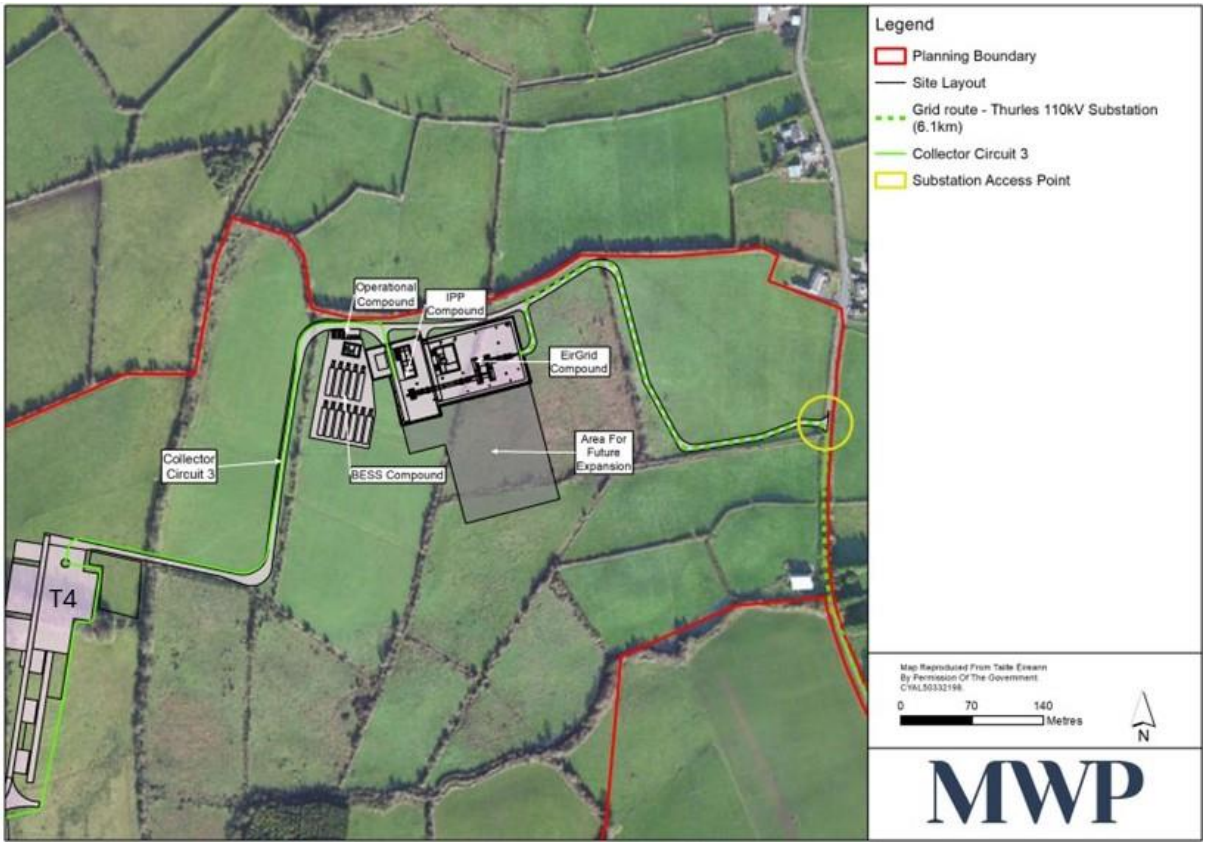

Figure 5- Proposed 110kV on-site Electrical Substation

3.1 Design Flexibility

A design flexibility meeting was held with An Bord Pleanála on 2nd May 2024 where the board considered the report of the inspector, the documents submitted as part of the pre-application consultation under Section 37CC of the Planning and Development Act 2000 as amended on design flexibility. Flexibility was requested on turbine dimensions, hardstand areas and Maximum Export Capacity (MEC).

In accordance with Section 37CD(2) of the Act, the Board determined that due to the specific circumstances of the development, it is satisfied that the proposed application can be made and decided before certain details of the application are confirmed (See Appendix 7 of the Application Form).

The precise turbine models have not yet been determined, this flexibility allows for the application to consider three different types of turbines with variable designs, blade lengths, and hub height. The power output of the proposed project will range from 57-66MW depending on what turbines are chosen. The characteristics of the three turbine types are presented in Table-2 and Figure-6 below. A single turbine type will be taken forward for construction. The final turbine type is subject to a procurement process.

Table 2- Characteristics of the three types of turbines proposed and assessed in the EIAR.

Turbine Type	Rotor Diameter	Tip Height	Blade length	Hub Height
A (1)	150m	180m	73.7m	105m
B (2)	155m	180m	76m	102.5m
C (3)	149m	180m	73m	105m

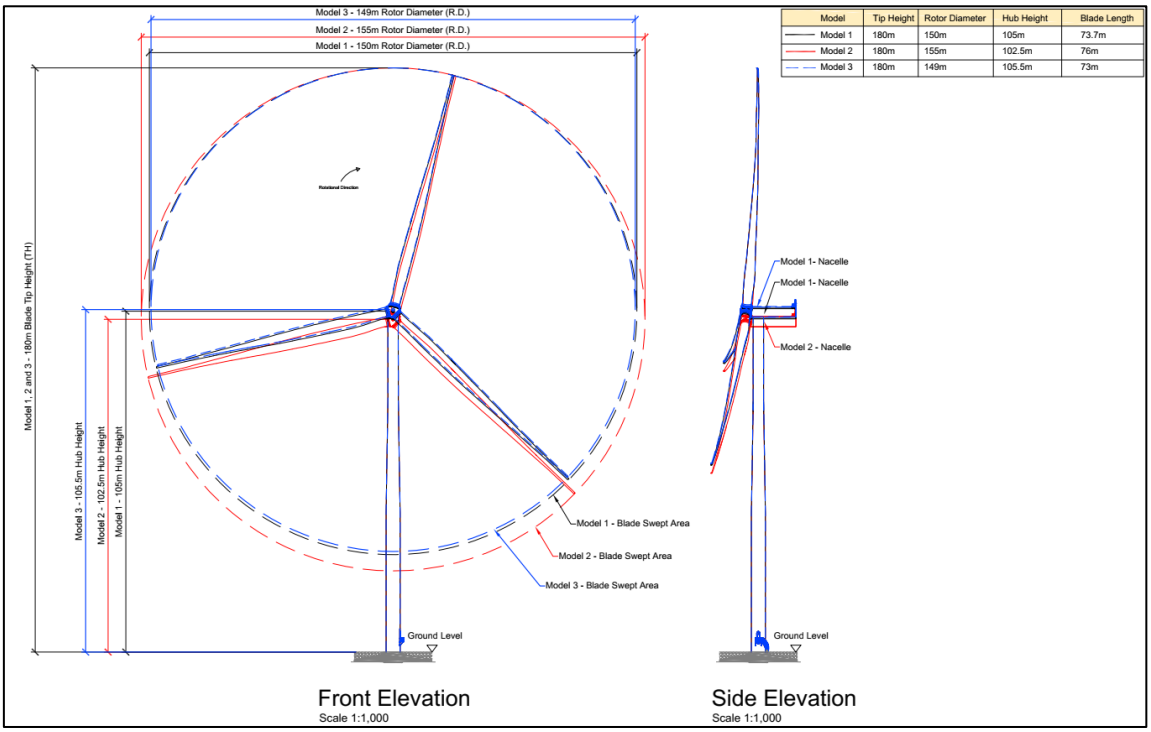

Figure 6- Diagram illustrating the differences between the three types of turbines being considered and applied for in the planning application

Turbine hardstands are required to accommodate the delivery of the turbine components prior to their erection, to support the cranes during erection and to provide a safe working area during construction, operation and decommissioning. Each wind turbine will have an associated turbine hardstand area adjacent to the foundation. It is proposed to construct a combined handstand that is suitable for all the proposed turbine options. The footprint of each turbine hardstand fits within the combined hardstand detailed in Figure.7.

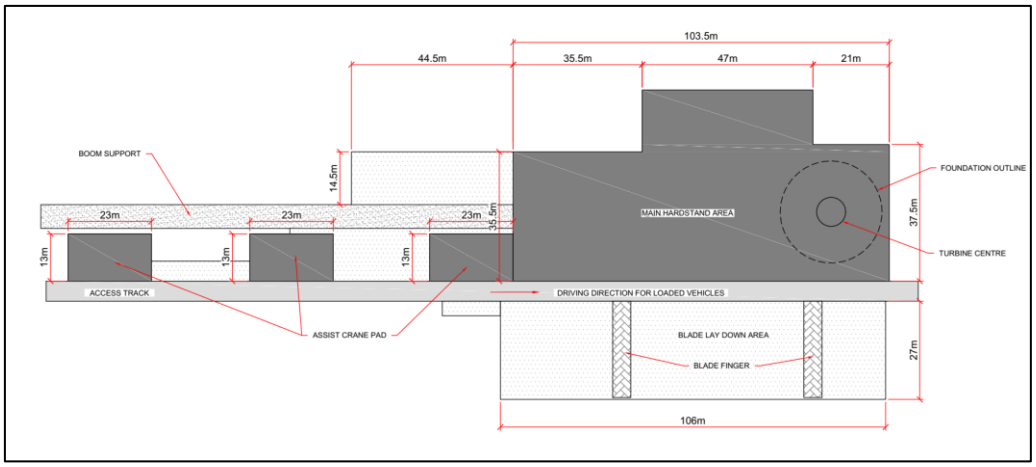

Figure 7- Proposed Combined Hardstand Layout

4. Planning Policy Context

This Section outlines the relevant National, Regional and Local Planning Policies including any new and emerging policy and development objectives relating to climate change and renewable energy.

4.1 International Policy

4.1.1 The Renewable Energy Directive

In June 2009, the European Commission published EU Directive 2009/28/EC (the 'Renewable Energy Directive') on the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC on the promotion of electricity produced from renewable energy sources in the internal electricity market.

The Renewable Energy Directive (2018/2001/EU) entered into force in December 2018, as part of the Clean energy for all Europeans package, aimed at maintaining the EU's status as a global leader in renewables and, more broadly, helping it to meet its emissions reduction commitments under the Paris Agreement.

It established a new binding renewable energy target for the EU for 2030 of at least 32%, with a clause for a possible upwards revision by 2023. This target is a continuation of the 20% target for 2020. In order to help EU countries deliver on this target, the directive introduced new measures for various sectors of the economy, particularly on heating and cooling and transport, where progress has been slower (for example, an increased 14% target for the share of renewable fuels in transport by 2030).

It also included new provisions to allow citizens to play an active role in the development of renewables by enabling renewable energy communities and self-consumption of renewable energy and established better criteria to ensure bioenergy's sustainability

4.1.2 REPower EU Plan

In May 2022, the European Commission published its 'REPowerEU' Plan outlining the EU's path to energy independence from Russian fossil fuels by 2027. The plan outlines short-, medium- and long-term measures covering the following three pillars:

- Demand reduction;
- Diversification of suppliers for conventional (fossil) fuel imports whilst future–proofing the corresponding infrastructure; and
- Acceleration of the transition to renewable energy sources.

In March 2023, the European Union agreed on stronger legislation to increase its renewables capacity, raising the EU's binding target for 2030 to 42.5%, with the ambition to reach 45% - which would almost double the existing share of renewable energy in the European Union.

4.2 National Policy

4.2.1 National Planning Framework

The Project Ireland 2040 - National Planning Framework (NPF) sets the vision and strategy for the development of the country to 2040. The NPF sets out 10 no. strategic outcomes including a 'Transition to a Low Carbon and Climate Resilient Society'. 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. Key features identified in the NPF to facilitate the transition towards a low carbon energy future include:

- A shift from predominantly fossil fuels to predominantly renewable energy sources.
- Increasing efficiency and upgrades to appliances, buildings, and systems.
- Decisions around development and deployment of new technologies relating to areas such as wind, smart grids, electric vehicle2s, buildings, ocean energy and bio energy.
- Legal and regulatory frameworks to meet demands and challenges in transitioning to a low carbon society

The various policies in this Framework are structured under National Policy Objectives (NPOs) and National Strategic Outcomes (NSOs). The key policies of relevance to this proposal are:

- NSO 8: New energy systems and transmission grids will be necessary for a more distributed, renewables focus energy generating system, harnessing both the considerable on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy. As part of this NSO, the following is set out: 'Deliver 40% of our electricity needs from renewable sources by 2020 with a strategic aim to increase renewable deployment in line with EU targets and national policy objectives out to 2030 and beyond. It is expected that this increase in renewable deployment will lead to a greater diversity of renewable technologies in the mix'.
- NPO 54: Reduce our carbon footprint by integrating climate change 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.

4.2.2 Policy Statement on Energy Security in Ireland to 2030

In November 2023, the Government published a Policy Statement on Energy Security in Ireland to 2030 which outlined the key challenges to ensuring security of electricity supply such as having adequate electricity generation capacity, storage, grid infrastructure, interconnection and system services to meet both average and peak demand. It identifies the critical need to maintain security of supply throughout the transition to the target of up-to 80% of electricity consumption from renewable sources. It highlights the need for significant investment in additional flexible conventional electricity generation, electricity grid infrastructure, interconnection and storage in order to ensure security of electricity supply. It states also that the "majority of renewable energy generated by 2030 will be from wind and solar". Meeting our climate, renewable, and energy efficiency targets through actions and measures set out in the annually updated Climate Action Plan will deliver this secure energy future.

4.2.3 Climate Action Plan 2024

The Climate Action Plan 2024 (CAP24) is the third annual update to Ireland's Climate Action 2019. The purpose of the CAP is to lay out a roadmap of actions which will ultimately lead us to meeting our national climate objective of pursuing and achieving, by no later than the end of the year 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy. It aligns with the legally binding economy-wide carbon budgets and sectoral emissions ceilings that were agreed by Government in July 2022. A draft of the CAP24 was agreed by Government in December 2023, and the finalised version was approved on the 21st of May 2024.

The Plan implements the carbon budgets and sectoral emissions ceilings and sets a roadmap for taking decisive action to halve our emissions by 2030 and reach net zero no later than 2050. In 2022, renewable generation accounted for 38.6% of electricity, an increase from 35% in 2021. Electricity emissions decreased by 2% in 2022 which is attributable to an increase in renewable generation, coupled with reductions in coal, fuel oil, and peat use for electricity generation. One of the overarching aims of the CAP is Increasing renewable generation to supply 80% of demand by 2030 through the accelerated expansion of onshore wind and solar energy generation, developing offshore renewable generation, and delivering additional grid infrastructure. Wind energy is at the heart of the Plan with a target of 9GW of onshore wind energy by 2030, to approximately double the existing onshore wind energy resource. The proposed wind farm will contribute to achieving these targets.

4.2.4 Planning Guidelines for Wind Energy (DoEHLG 2006)

In 2006, the Department of Environment, Heritage and Local Government (DEHLG) published Wind Energy Development Guidelines for Planning Authorities under Section 28 of the Planning and Development Act, 2000, requiring planning authorities and An Bord Pleanála to have regard to them. The Guidelines offer advice to planning authorities on planning for wind energy through the development plan process and in determining applications for planning permission. They advise on land use and environmental issues for land-based (onshore) wind farms. They also provide clarity to prospective developers and local communities. The Guidelines are also intended to ensure a consistency of approach throughout the country in the identification of suitable locations for wind energy development and the treatment of planning applications for wind energy developments.

4.2.5 Draft Revised Wind Energy Guidelines (DoHPLG, Dec 2019)

In December 2019, the Department of Housing, Planning and Local Government published proposed draft revised guidelines for wind energy developments addressing a number of key aspects including noise, visual amenity setback, shadow flicker, community consultation obligations, community dividend and grid connections. The Draft Revised Guidelines were consulted on from 12 December 2019 to 19 February 2020.The publication of the Draft Guidelines at the end of 2019 followed a lengthy review process including the issue of draft revisions in December 2013 and a Preferred Draft Approach document in June 2017. At the time of writing, the Guidelines have not yet been finalised and are not formally in place, therefore the 2006 Guidelines continue to apply to new developments. Notwithstanding this, the design and environmental assessment of the proposed project has taken due consideration of the proposed new guidelines (e.g. housing setback, shadow flicker, community engagement).

4.2.6 Best Practice Guidelines for the Wind Energy Industry (IWEA 2012)

These Guidelines were published in April 2012 as a best practice guide for wind energy developments, replacing the 2008 and 1994 publications of the same title. In the 2012 publication, there is a much greater emphasis on the environmental and community aspects of development, reflecting increased awareness and the need for a higher level of scoping and wider consultation. It is intended as a 'reference document' to complement the DoHPCLG's (formerly DoEHLG) 2006 guidelines and its main purpose is to encourage 'responsible and sensitive wind farm development' that takes into consideration the concerns of local communities, planners and other interested parties. The emphasis is on responsible and sustainable design and environmental practices, external stakeholder relations and good community engagement practices.

Issues addressed include:

- Feasibility Study Guidelines;
- Planning and Environmental Legislation;
- Environmental Impact Assessment;
- Wind Farm layout;
- Health and Safety/Construction and Operation; and
- Community Engagement.

4.3 Regional Planning Policy

4.3.1 Southern Regional Assembly- Regional Spatial and Economic Strategy (RSES)

The Southern Regional Assembly is responsible for the preparation and implementation of a Regional Spatial and Economic Strategy (RSES) for the Southern Region. The RSES for the Southern Region came into effect on 31st January 2020 and the primary aim of the RSES is to implement Project Ireland 2040 - the National Planning Framework. Furthermore, the Southern Regional Assembly supports the implementation of the Irish Government's Climate Action Plan.

The RSES recognises and supports the many opportunities for onshore wind as a major source of renewable energy. The RSES sets out the following Policy Objectives (RPO's) on renewable energy:

- 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 off shore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.
- RPO 219 - New Energy Infrastructure It is an objective to support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers (subject to appropriate environmental assessment and the planning process) to ensure the energy needs of future population and economic expansion within designated growth areas and across the Region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs.

- RPO 221 - Renewable Energy Generation and Transmission Network

  a. Local Authority City and County Development Plans shall support the sustainable development of renewable energy generation and demand centres such as data centres which can be serviced with a renewable energy source (subject to appropriate environmental assessment and the planning process) to spatially suitable locations to ensure efficient use of the existing transmission network;

  b. The RSES supports strengthened and sustainable local/community renewable energy networks, micro renewable generation, climate smart countryside projects and connections from such initiatives to the grid. The potential for sustainable local/community energy projects and micro generation to both mitigate climate change and to reduce fuel poverty is also supported;

  c. The RSES supports the Southern Region as a Carbon Neutral Energy Region.

4.4 Local Policy

The Tipperary County Development Plan 2022-2028 sets the overall strategy for the planning and sustainable development within the administration boundaries of County Tipperary, and came into effect on the 22nd of August 2022. This plan has combined the North and South of the County now comprising of one plan opposed to two. The plan outlines its ambition for the development of the County's renewable energy supply. The Plan sets a target of 600MW of wind energy to be constructed and operational by 2028 while stating that the county currently has 475MW of wind energy installed.

Chapter 10 of the Plan outlines the Plans policies and objectives in relation to Renewable Energy and Bioeconomy. This Plan supports investment and development in renewable energy and the bioeconomy, as part of a national transition to a low-carbon, climate resilient and circular economy. The Plan states:

'Renewable energy and the bioeconomy are important aspects of our diverse and vibrant rural economy, with synergies between and across other areas such as climate action, job creation and amenity development. It is understood that by supporting a climate resilient, biodiversity-rich, environmentally-sustainable and climate-neutral economy we can make optimum use of our available renewable energy resources. The Council, with the support of the Tipperary Energy Agency and through the Core Strategy of this Plan, has strongly committed to the support of renewable energy as part of sustainable economic growth in line with the National Renewable Energy Action Plan of the Government.'

Relevant Policies and Objectives in the Plan include:

3 - 1 Promote and facilitate renewable energy development, in accordance with the policies and objectives of the Tipperary Renewable Energy Strategy 2016 (and any review thereof), and the Tipperary Climate Adaptation Strategy 2019.

3 - A Support and facilitate the implementation of European and National objectives for climate adaptation and mitigation, and to prepare a Climate Action Plan for Tipperary in compliance with the Climate Action and Low Carbon Development (Amendment) Bill (DECC, 2020) and any review thereof.

3 - E Support, in collaboration with stakeholders, research and innovation in smart renewable energy technologies and initiatives to accelerate diversification away from fossil fuels

10 - 1 Support and facilitate new development that will produce energy from local renewable sources such as hydro, bioenergy, wind, solar, geothermal and landfill gas, including renewable and non-renewable enabling plant, subject to compliance with normal planning and environmental criteria, in co-operation with statutory and other energy providers. The provisions of the Tipperary Renewable Energy Strategy (and any review thereof) as set out in Volume 3, will apply to new development.

10 - 5 Support and facilitate the co-location of renewable energy development and technologies to ensure the most efficient use of land identified as suitable for renewable energy generation.

10-A- Support the Climate Action Plan (DECC, 2019) as it relates to renewable energy production, having consideration to the strategic importance and potential benefits of renewable energy investment to rural communities.

10-C- To continue to support renewable energy development and to maintain a positive framework for development through the review of the Renewable Energy Strategy over the lifetime of the Plan.

As stated previously in Section 2.3 above, the proposed wind energy project is located within lands designated as being 'open to consideration for wind energy development". Relevant policies in the Wind Energy Strategy for wind energy developments within areas open for consideration include:

- TWIND 4.1- Proposals shall demonstrate conformity with existing and approved wind farms to avoid visual clutter. In this respect, developers should consider the cumulative impact of new development in the context of the location of both existing and permitted developments.
- TWIND 4.2- Proposals in Areas 'Open for Consideration' shall be sited having consideration to the landscape sensitivity and capacity analysis set out in the Tipperary Landscape Character Assessment 2016 and the provisions of the County Development Plan (as varied) in relation to landscape (Chapter 7). All applications shall have regard to the visual impact of turbines and ancillary development (such as access roads, boundary fencing, control buildings and grid connections).
- TWIND 4.4- All Projects are required to be screened for Appropriate Assessment Screening in accordance with Article 6(3) of the Habitats Directive and the provisions of the County Development Plan (as varied).
- TWIND 4.5- Applications for wind development shall be accompanied by a technical assessment in relation to the slope stability, landslide susceptibility of the development site and the proposed project. This assessment shall incorporate slope stability mapping and groundcover assessment in the context of potential cumulative effects arising from multiple developments.
- TWIND 4.6- All proposals for wind energy development will have regard to the cumulative effect of the development on the environment when considered in conjunction with other existing and permitted wind energy developments in the area.
- TWIND 4.7- All applications will have regard to the impact on existing built environment, particularly neighbouring residential properties and other sensitive amenity areas.
- TWIND 4.8- All applications will have regard to the impact of any proposal for wind energy development on surrounding tourism and recreational related activities and the compatibility of same will be carefully considered in the assessment of any planning application.
- TWIND 4.9- All applications will have regard to the impact of any proposal for wind energy development in the context of any flood risk in the area. A comprehensive flood risk assessment for proposals in an area at risk of flooding, adjoining same or where cumulative impacts may result in a flood risk elsewhere, in low lying areas or in areas adjacent to streams.
- TWIND 4.10- All applications will ensure that details of the proposed grid connection and all associated infrastructure are considered in the Environmental Impact Statement (EIA) and Natura Impact Statement as may be required.

- TWIND 4.11- All applications will have regard to the impact on rivers and streams and will demonstrate compliance with the Water Framework Directive.

5. Planning Assessment

5.1 Principle of Development

The principle of the proposed Brittas Wind Farm project is considered to be compatible with Planning Policy at all levels of government. Renewable energy projects are supported in principle at National, Regional and Local policy levels, with the need to reduce greenhouse gas emissions, reduce resilience on fossil fuels and combat climate change.

It is perhaps sufficient to note the Climate Action and Low Carbon Development (Amendment) Bill 2021 establishes a legally binding framework with clear targets and commitments set in law, and ensure the necessary structures and processes are embedded on a statutory basis to ensure we achieve our national, EU and international climate goals and obligations in the near and long term. The Climate Action Plan which implements the carbon budgets and sectoral emissions ceilings and sets a roadmap for taking decisive action to halve our emissions by 2030 and reach net zero no later than 2050. Wind energy is at the heart of the Plan with a target of 9GW of onshore wind energy by 2030.

The common theme throughout policies at a national and regional level is the need to promote and enhance renewable energy in Ireland. This project will contribute directly towards meeting Ireland's renewable energy production targets and specific objectives for onshore wind capacity.

The project is located in an area designated as being 'open to consideration for wind energy development'. It is important to note that there are no lands within the County designated as being acceptable in principle for these developments. Therefore subject to the extensive assessments undertaken as part of this planning application it is considered that a Wind Energy project in this proposed location is in line with the proper planning and development of the area, in line with the policies of the County Development Plan. The site has been assessed as having the potential to accommodate a Wind Energy project.

The 2006 Planning Guidelines and the 2012 IWEA Guidelines were consulted in considering the location of the proposed wind farm, its design and layout and also in assessing and, where applicable, mitigating its impact on the environment and the community in which it is located, with particular attention focused on the chapters of the EIAR that assess the specific impacts of wind farm development (i.e. noise, shadow flicker, biodiversity, land, soils, hydrology, landscape and visual, traffic and cultural heritage).

A community participation and engagement programme will provide a gain for the community in the form of a community benefit fund. Further details are provided in EIAR Volume II Appendix 1F. This meets the requirements of the 2012 IWEA Best Practice Guidelines and the 2016 DCCAE Code of Practice, which informed both the design and execution of the community engagement programme for the project.

5.2 Design and Layout

The layout reflects the outcome of the iterative engineering and environmental analysis approach adopted during the wind farm design process which considered a number of factors including minimising any risk in terms of poor ground conditions, negative influences on the existing drainage, avoidance of sensitive ecological habitats, set

back distances from dwellings and any known archaeological features. The design has also benefitted from input from relevant bodies and the public. The design rationale and evolution is described in EIAR Volume II Chapter 4.

5.3 Environmental Impact Assessment Report (EIAR)

EIA provisions in Irish Law in relation to planning consents are currently contained in the Planning and Development Act, 2000, (Part X) as amended, and in Part 10 of the Planning and Development Regulations, 2001, as amended. The EIA Directive and the Planning and Development Regulations 2001, as amended, provide that in respect of an application for development consent where EIA is required, the developer (applicant) is required to prepare and submit an EIAR to the competent authority.

This Planning Application is supported by an EIAR. The EIAR includes the following chapters:

1. Introduction
2. Project Description
3. Civil Engineering
4. Alternatives
5. Population and Human Health
6. Biodiversity
7. Ornithology
8. Land and Soil
9. Water
10. Material Assets
11. Cultural Heritage
12. Noise and Vibration
13. Shadow Flicker
14. Air Quality and Climate
15. Landscape and Visual
16. Traffic
17. Interaction of Effects
18. Schedule of Environmental Mitigation Measures

Each specialist impact assessment chapter includes a methodology, scoping, baseline assessments, impact assessment of the construction, operation and decommissioning phases, mitigation, any design changes to reduce or remove impacts, residual impacts and cumulative effects.

The main findings of the EIAR are set out in 'Volume 1 – Non Technical Summary' of the EIAR report. It is concluded that with the application of various mitigation measures, there are no impacts that are considered unacceptable within the context of the planning policy framework for assessing wind energy projects and also that the proposed wind farm is supported by Government policy regarding the promotion of renewable energy and is consistent with planning guidance for the development of wind energy.

5.4 Residential Amenity

The proposed wind farm site is located on a site currently used for agriculture. There are no uninvolved occupied properties located within 720 metres of a proposed turbine location. There are three main possible receptors with potential impacts on residential amenity as a result of the Wind Energy development which are Noise and Vibration, Shadow Flicker and Visual Amenity. Detailed shadow flicker and noise modelling have been undertaken

as part of the EIAR, Chapter 12 addresses Noise and Vibration and Chapter 13 addresses Shadow flicker. A detailed landscape and visual impact assessment was undertaken as part of Chapter 15.

Mitigations Measures will be in place at construction, operational and decommissioning phases of development to ensure the impact on the amenity of residents are minimised.

5.5 Appropriate Assessment (AA) Report and Natura Impact Assessment (NIS)

This planning application is supported by a Screening for Appropriate Assessment (AA) Screening Report and Natura Impact Statement (NIS) prepared by Woodrow Sustainable Solutions. The AA Screening Report concluded that on the basis of objective scientific information following screening and in light of the conservation objectives of Lower River Suir SAC, Likely Significant Effects cannot be ruled out during construction, operation and decommissioning activities for the proposed project. This report also concluded that it can be excluded, on the basis of objective scientific information that there will not be any significant effects on any other European Site. Consequently, it is was therefore recommended that the proposed project progress to the Stage 2 of the AA process to determine if the proposed project will adversely affect the integrity of the Lower River Suir SAC.

The Natura Impact Statement sets out a number of mitigation measures which are considered to be sufficient in preventing any effect on the qualifying interests or the integrity of the Natura 2000 sites identified as potentially affected by the project. Therefore, It is considered that the Brittas Wind Farm, individually or in-combination with any other plan or project, will have no adverse effects on the integrity of the Lower River Suir SAC or any other Natura 2000 sites.

5.6 Landscape

An extensive Landscape and Visual Impact Assessment has been undertaken as part of Chapter 15 of the EIAR. In accordance with best practice a 20km applied for this chapter. The vast majority of the study area, including all areas within approx. 9km of the site, is within Co. Tipperary. In addition, eastern sections of the study area are within Co. Kilkenny; the northeast section is within Co. Laois, while a small north-western section is within Co. Offaly.

A summary of the landscape and visual effects within this chapter is outlined as follows:

Landscape Effects

The landscape sensitivity of the site and its immediate surrounds, as well as the wider study area, is considered to be Low-Medium. In terms of the significance of the likely landscape effects during the construction phase, this will result in a Moderate significance of landscape effect for the on-site elements of the proposed development. While the quality of effect will be Adverse, the construction phase will also be short-term in nature (i.e. expected to last for up to 18 months). The proposed grid connection route, as well as some other elements of the project to be assessed, will result in a Slight significance of landscape effect, and will be Neutral-Adverse in nature. For the wider landscape of the study area, this will result in an Imperceptible landscape effect during the construction phase, with a quality of effect that will be Neutral in nature and Short-term in duration.

In terms of the significance of likely landscape effects during the operational phase (i.e. post-construction), this will result in a Moderate significance of landscape effect for the on-site elements of the proposed development. The quality of effect will be Adverse in nature and long-term in duration. In terms of the wider landscape, the likely landscape effects during the operational phase will result in a Slight significance of landscape effect. The quality of effect will be Adverse in nature and long-term in duration.

Thus, no significant landscape effects are likely to be generated by the proposed development.

Visual Effects

In terms of the significance of the likely visual effects during the construction phase, these are likely to be localised and affect only the site and immediate vicinity, with some patrial views from public roads. However, all likely construction-stage visual effects will be short-term in duration. In summary, the visual effects are likely to be Moderate and adverse in the immediate vicinity of the site, while the grid connection is likely to result in Not Significant adverse visual effects. With regards to the other elements of the project that are to be assessed within this EIAR, these are likely to result in Imperceptible and neutral visual effects. Meanwhile, the significance of visual effect on the wider landscape is considered to be Imperceptible and neutral.

In terms of the significance of the likely visual effects during the operational phase, of the 25 No. viewpoint locations assessed: three viewpoints were judged to be Significant and adverse; one viewpoint was considered Moderate-Significant and adverse; three viewpoints were considered Moderate and adverse; three viewpoints were considered Slight-Moderate and adverse; seven viewpoints were considered Slight (five of which were adverse, with two being neutral); three viewpoints were considered Not Significant and neutral, and, finally, five viewpoints were considered Imperceptible and neutral.

Thus, some localised significant visual effects are likely to be generated as a result of the proposed development.

6. Conclusion

This report sought to highlight the relevant planning merits relating to the proposed Wind Energy Development. The proposed wind farm is located in an area 'Open to Consideration' to Wind Energy Developments within the Tipperary Wind Energy Strategy.

The development design has undergone an extensive engineering and environmental analysis and has been informed by consultation with the public and relevant bodies. The environmental studies and assessments completed demonstrate the project will not create an unacceptable impact on the environment and residential amenity. The NIS assessment concludes that the proposed development, either individually, or in combination with other plans/projects, will not affect the integrity of any Natura 2000 Sites.

It is therefore considered that the proposed development is in accordance with the proper planning and sustainable development of the area and will contribute towards achieving National and EU targets and in particular the objectives of the Climate Action Plan. It will also contribute towards Tipperary County Council's goal of becoming a leader of renewable energy provision and meeting the County's energy target for 2030.