4.0 POLICY, PLANNING & DEVELOPMENT CONTEXT

4.1 INTRODUCTION

This chapter considers the proposed project in terms of legislative context and in relation to strategic, national, regional and local planning policies and objectives, in order to ascertain whether it is consistent with the relevant legislation and with the proper planning and sustainable development of the area.

The nature and location of the proposed project is described fully in Chapter 2 (Description of the Proposed Project) and will comprise 15 no. wind turbines, a 110kV electrical substation and grid connection. The proposed wind farm site is in an upland area within the townlands of Knocknanask, Tooranaraheen, Knocknasheega, Scartmountain, Coolagortboy, Took, Moneygorm, Moneygorm East, Moneygorm West, Lackenrea Co. Waterford.

The proposed grid connection (including the proposed substation) is located within the townlands of Lisroe, Staigbraud, Scartmountain, Inchindrislawood, Ballykerin Middle, Colliganmountain, Scart (Sergeant), Carrigaun (Hely), Graigue Beg, Carrowgarriff More, Killadangan, Glen Lower, Coolroe, Vicarstown South, Carrowgarriff Beg, Churchquarter, Colligan More, Graigue More, Scart (Hely), Parkmore, Colliganwood, Newtown, Ballymacmague North, And Inchindrisla, Co. Waterford.

There are also temporary and permanent works required in relation to the proposed Turbine Delivery Route (TDR) to provide safe access to the site for the delivery of oversized loads (turbine components).Proposed permanent works include the widening of the local roads near the proposed wind farm site located within and along the boundaries of the townlands of Lackenrea, Cluttahina, Turbeha, Lacken, Belleville and Crinnaghtaun West, Co. Waterford. Proposed temporary works include junction upgrade works in the Crinnaghtaun West as well as roundabout upgrade works in the townlands of Ballyduff East, Co. Waterford and; Kilmurry and Rathpatrick, Co. Kilkenny.

The site of the proposed wind farm is located approximately 4 km northeast of Cappoquin, and approximately 13 km northwest of Dungarvan in County Waterford. In general terms, the area surrounding the site can be described as rural with a dispersed settlement type.

As the proposed wind farm site and the associated areas lie within the functional areas of Waterford City and County Council, and Kilkenny County Council, the proposed project is informed by the provisions of the Waterford City and County Development Plan 2022-2028 and the Kilkenny City and County Development Plan 2021-2027. The Tipperary County Development Plan 2022-2028 has also been consulted as the proposed wind farm site is located close to the southern border of County Tipperary.

Additionally, **Section 4.2.2** of this chapter sets out the overall approach and methodology for carrying out cumulative impacts assessment across this EIAR, and also includes an overview of wind farm development within the area.

The relevant global, European, national and regional climate, energy and planning policies as set out in **Section 4.3** of this report emphasise the need to generate renewable energy and the importance of moving towards decarbonising the economy. The proposed project will contribute to the expansion of the renewable wind resource in Ireland and contribute towards governmental, national and regional goals and targets by generating more power from renewable resources. The 2009 EU Renewable Energy Directive (2009/28/ EC) set Ireland a legally binding target to meet 16% of our energy requirements from renewable sources by 2020. In 2018, the Directive was recast (2018/2001/EU) to move the legal framework to 2030 targets, setting a new binding target of at least 32% with a clause for a possible upwards revision by 2023. In 2023, the Directive was further amended to set a new binding renewable energy target of at least 42.5% at EU level, but aiming for 45%, emphasising a growing obligation to renewable energy sources.

According to a report by Climate Action Network Europe (CAN), published in 2019, Ireland was *"way off track with its greenhouse gas emission reductions in sectors such as transport, buildings, waste and agriculture (non-ETS) both for 2020 and 2030"*[1].

It is now widely established that Ireland did not meet the 2020 renewable energy targets. A report issued by the Sustainable Energy Authority of Ireland (SEAI) entitled 'Renewable Energy in Ireland – 2020 Update' showed that Ireland was still heavily dependent on fossil fuels.[2] Out of the 27 EU member states, plus the UK, Ireland had made the second lowest progress towards hitting the targets, with only the Netherlands performing worse. Ireland will be subject to tariffs through the EU Emissions Trading System (ETS) until these targets are realised. More recently, a report published in 2023 by the SEAI titled 'Energy in Ireland', states that '*even with a full delivery of the policies and measures identified in the Government's 2023 Climate Action Plan (CAP-23), the energy sector will likely still be off-track to keep within its share of Ireland's legally binding carbon budgets'*. The report also found 85.8% of primary energy came from oil, natural gas, coal, and peat in 2022 with only 13.0% of Ireland's primary energy requirement in 2022 sourced from renewables[3].

The Irish Government published the Climate Action Plan 2024 (CAP24) on the 20th of December 2023 which sets ambitious actions to ensure our 2030 targets can be achieved. This in the context of substantial and continuing failure by Ireland in meeting climate targets to date. CAP24 recognises that Ireland must significantly increase levels of renewable energy in the country sets out the roadmap to deliver on Ireland's climate ambition which aligns with the legally binding economy-wide carbon budgets and sectoral ceilings that were agreed by Government in July 2022. CAP 24 aims to build on the progress made under CAP23 which stated *"transformational policies, measures and actions, and societal change are required to increase the deployment of renewable energy generation, strengthen the grid, and meet the demand for flexibility in response to the challenge"* by delivering policies, measures and actions that will support the achievement of our carbon budgets, sectoral emissions ceilings, and 2030 and 2050 climate targets.

4.2 PLANNING HISTORY AND CUMULATIVE EFFECTS

This section comprises a desktop review of historic planning applications[4] made within the proposed project site and developments considered for cumulative effects within a specific study area from the proposed project site.

[1] 2 CAN, Time to Pick up the Pace – Insights into the draft National Energy & Climate Plans (2019)
[2] https://www.seai.ie/publications/2020-Renewable-Energy-in-Ireland-Report.pdf
[3] https://www.seai.ie/data-and-insights/seai-statistics/key-publications/energy-in-ireland/
[4] Planning application data sourced from DEHLG, ABP and SEAI Wind Atlas.

4.2.1 Planning History Within the Proposed Project Site

A desktop review of planning applications conducted on 13/12/2024 presents the following results within the proposed project site:

1. Proposed Wind farm Site:
   - No prior planning history.
2. Proposed Turbine Delivery Route:
   - **Waterford Ref. 1543** – Permission for the conversion of the garage to habitable accommodation and for the existing as constructed extension along with all associated site works was granted on 01/05/2015.
   - **Kilkenny Ref. 19259** – Permission for the demolition of an existing gate house/security office at the main entrance to Belview Port and its replacement with a new larger gate house/security office and all associated site works including the provision of temporary security offices and temporary weighbridge, relocation of one existing weighbridge, entrance alterations, drains and services. Also planning permission for the construction of a second security office, two number car parking spaces, barriers and associated site works to control access to the rear entrance to Belview Port. Granted on 17/09/2019.
   - **Waterford Ref. 21735 (ABP-311670-21)** - Permission for development of circa 10km of grid connection infrastructure on the public road (N72) to connect the approved Drumroe East Solar Farm (Planning Reference 16/126) to the Dungarvan 100kV ESB Substation, comprising the laying of 38kV underground electricity cables and associated infrastructure, and horizontal directional drilling. A Natura Impact Statement has been prepared in respect of the application. Granted on 09/01/2023.
   - **Kilkenny Ref. 22297**- Permission for the refurbishment of the existing gate house / security office at the main entrance to Belview Port to include new external cladding and windows, and a proposed extension to the existing structure to add toilet facility and associated site works. Granted on 03/08/2022.
   - **Waterford Ref. 2360477** – Permission to retain indefinitely openings for new windows to the existing dwelling house. Planning permission is also required for the construction of a one and a half storey extension with balcony to the rear of the existing dwelling house, alterations to existing entrance driveway and entrance walls, alterations to existing dwelling house and all ancillary works. Granted on 03/04/2024.
   - **Waterford Ref. 2460541 –** Permission for an existing ancillary storage shed and PLANNING PERMISSION for the change of use from convenience shop to convenience shop with ancillary off licence. Granted on 05/11/2024.

3. Proposed Grid Route:
   - **Waterford Ref. 21735 (ABP-311670-21)** - Permission for development of circa 10km of grid connection infrastructure on the public road (N72) to connect the approved Drumroe East Solar Farm (Planning Reference 16/126) to the Dungarvan 100kV ESB Substation, comprising the laying of 38kV underground electricity cables and associated infrastructure, and horizontal directional drilling. A Natura Impact Statement has been prepared in respect of the application. Granted on 09/01/2023.

- **Waterford Ref. 21918**- Permission for the RETENTION of existing car parking (max 40 spaces) in use as an overspill parking area by Radley Engineering staff and a pedestrian access gateway onto the L7001 from the factory site to same. PLANNING PERMISSION is also sought for 1. A 67 no. space permanent car park (to replace that for which retention is sought), a pedestrian crossing to public roadway the L7001, revisions to existing entrance to serve the car park and associated site works; 2. A new wastewater treatment system to replace the existing septic tank system serving the factory site; 3. Modifications to existing western boundary to south of proposed pedestrian crossing to facilitate sightlines and 4. Change of use of an existing residential dwelling house to office accommodation together with the installation of an additional external pedestrian door to the northern elevation of said building. Granted on 12/07/2022.
- **Waterford Ref. 21639**- Permission for Indefinite retention of (1) side and roof coverings added to existing vessel and skid high level assembly area (2) Single bay extension added to sanitary pipe fabrication unit (3) Lean to structure added to entry of existing carbon piping unit and (4) 2 No. 4-bay conjoined portal frame storage warehouse units. Granted on 11/01/2022.
- **ABP Ref. 317265** – Construction of Dyrick Hill Windfarm comprising 12 no. wind turbines and related works. This application was refused on 03/10/2024.
- **ABP Ref. 318446** - Proposed construction of Coumnagappul Wind Farm consisting of 10 no. turbines and associated infrastructure. This application is undecided at the time of authoring this chapter.

4.2.2 Projects Considered for Cumulative Impact Assessments

Legislative Context

The EIA Directive requires that a description of the likely significant effects of a project should include an assessment of cumulative effects that may arise. The factors to be considered in relation to cumulative effects include population and human health, biodiversity, land, soil, water, air, climate, material assets, landscape, and cultural heritage as well as the interactions between these factors.

To gain a comprehensive view of cumulative effects on these environmental considerations and to inform the EIA process being undertaken by the consenting authority, each relevant chapter within this EIAR includes a cumulative impact assessment. The potential for cumulative effects arising from other projects have been fully considered within this EIAR.

Separately, detailed consideration of the approach to afforestation requirements associated with the project is attached in **Appendix 2-11** of this EIAR. Clear-felling of trees in the State requires a felling licence. The associated afforestation of alternative lands equivalent in area to those lands being permanently clear-felled is also subject to licensing ('afforestation licensing'). The Forest Service of the Department of Agriculture, Food & the Marine is Ireland's national forest authority and is responsible for all forest licensing. In light of the foregoing and for the purposes of this proposed project, the applicant commits that the location of any replanting (alternative afforestation) associated with the proposed project will be greater than 10km from the proposed wind farm site and also outside any potential hydrological pathways of connectivity i.e., outside the catchment within which the proposed project is located.

On this basis, it is reasonable to conclude that there will be no more than imperceptible indirect or in-combination effects associated with the replanting. In addition, the developer commits to not commencing the project until both felling and afforestation licences are in place and this ensures the afforested lands are identified, assessed and licensed appropriately by the relevant consenting authority.

Methodology

To aid the cumulative impacts assessment across various chapters of this EIAR, a desktop review of all planning applications[5] made to An Bord Pleanála (ABP), Waterford City and County Council, Tipperary County Council and Kilkenny County Council was conducted to determine a list of permitted and proposed (awaiting a planning decision) projects that are anticipated to have the potential to result in cumulative effects in combination with the proposed project. Additional searches were carried out using Google Search and Google Maps to find any existing facilities (e.g. commercial and industrial operations and services) that might have potential to cause cumulative effects from ongoing operations. Existing forestry and agriculture were also considered as there would be ongoing activities associated with these.

It should be noted that this list of permitted and proposed projects is not exhaustive as each specialist EIAR chapter will investigate and consider additional development types depending on specialist requirements and considerations.

The study area used for this review is set at a 20 km radius of the proposed wind farm site, a 200m buffer from the proposed Grid Connection Route (GCR) and proposed TDR. Applications included within this study area have been selected from applications made to the planning authorities mentioned above, based on their nature and scale as well as their potential for interaction with the proposed project. It is noted that technical EIAR chapters such as Chapters 6 to 16, use their own prescribed study areas to assess for cumulative impacts, as described in the relevant chapters. Project types considered within the cumulative impacts assessment across the EIAR differ according to specialist requirements which are specified in each chapter and therefore will include additional developments to the ones listed in this chapter.

Sensitive receptors within a 2km buffer from the wind farm site have been considered and assessed under Chapter 5 (Population and Human Health).

All applications granted within a 10-year period from 2015 up to December 2024[6] were considered as part of this review. There are no published guidelines that outline the appropriate search period to be used in determining the period, but as regular planning permission normally lasts for 5 years (Strategic Infrastructure Development (SID) permissions lasting generally 10 years) with a possibility to be extended for a further 3, a 10-year planning history period (i.e. for the 10 years before submission of this application) was appropriate in this instance to capture other development in the area with the potential for cumulative impacts. Any projects where permission has expired would not have the possibility of being built/operational at the same time as the proposed project (without further consent).

Projects Considered within the 20km Wind Farm Study Area

Below are select planning applications within 20km from the proposed wind farm site which have been selected based on their scale, strategic importance and potential for cumulative effects:

[5] Planning application data sourced from DEHLG and ABP.

[6] 13th December 2024.

Wind Farms

Coumnagappul Wind Farm ABP Ref. 318446 -The proposed development area of Coumnagappul Wind Farm is located 16 km North of Dungarvan and 4km North of Kilbrien Village in County Waterford. The site was identified in the Waterford County Development Plan as a preferred area for wind development. EMPower propose a ten turbine wind farm. The wind farm site comprises a 110kV substation and is expected to connect to the 110kV Dungarvan substation via underground cable. A decision is due for this application.

Dyrick Hill Wind Farm ABP Ref. 317265 – The proposed development comprises of the construction of Dyrick Hill Windfarm comprising of 12 wind turbines and related works, located within the townlands of Ballymacmague North, Ballymacmague South, Ballynaguilkee Lower, Ballynaguilkee Upper, Broemoutain, Carrigaun (Mansfield) and others, Co. Waterford. A decision was due on the 5th of December 2023.

Knocknamona Wind Farm Waterford Reg. Ref. 20845 (ABP Ref. – 309412) - Proposed amendments to Knocknamona Wind Farm previously authorised under ABP Ref No. PL93.244006, which was accompanied by an EIAR and AA Report. Revised EIAR and NIS received with appeal, was granted with conditions on 28/09/2022. The permitted development is located within Knocknagloch Lower/Barranastook Upper/, Knocknamona/ Woodhouse or Tinakilly/, Monageela/ Killatoor townlands, Dungarvan Co Waterford.

Lyrenacarriga Wind Farm ABP Ref - 309121 - A Wind Farm Development and all associated infrastructure is proposed within the townlands of Lyrenacarriga, Co. Waterford and the townlands of Lyremountain, Co. Cork. The application was granted by ABP on 08/11/2023.

Grid Connections

Waterford Reg. Ref. 21735 (ABP Ref. 311670) - A 10kV underground grid connection infrastructure on N27 road to connect a Solar Farm to ESB Substation accompanied by a Natura Impact Statement was granted with conditions on 09/01/2023. The permitted development is located within Killadangan, Ballymacmaque South, Ballymacmague North, Ballylemon Lower, Knockacullen, Killeeshal, Ballynamintra Upper, Cappagh, Kilcannon (Osbourne), Kilcannon (Hely), Ballyna hemery, Rockfield, Bawnavinnoge, Kilcoher, Boherawillin, Drumroe, Cappoquin, Co. Waterford.

Waterford Reg. Ref. 19/369 (ABP Ref. 306497) – A proposed Windfarm Grid Connection accompanied by an EIAR was granted with conditions on 18/02/2021. The permitted development is located in Keereen Upper/Woodhouse or, Tinakilly/Knocknamona Townlands, Dungarvan, Co. Waterford.

Waterford Reg. Ref. 23/60416 (ABP Ref. 318545) - Underground electrical cabling linking to wind farm (to be constructed) with associated and ancillary site development works is proposed within the townlands of Keereen Upper, Woodhouse or Tinakilly and Knocknamona, Dungarvan, County Waterford. A decision is due for this application.

Additionally, the current Waterford CDP lists projects identified by EirGrid that will be subject to upgrade during the lifetime of the new development plan:

- CPO753: Waterford 110kV Station – Upgrade 110kV Bay (on hold);
- CPO779: Dungarvan 110kV Station – Transmission works associated with installation of new 38kV GIS;
- CP1052: Knocknamona 110kV new Station – Wind Farm connection.

Solar Farms

Waterford Reg. Ref.- 17/564 (ABP Ref. 300004)–10-year permission for construction of Solar PV Energy development, substation, transformer, solar panels and all associated infrastructure and site works was granted with conditions on 19/02/2019. The permitted development is located in Ballyard, Ballyhane & Clashnagoneen, Cappoquin Co. Waterford.

Waterford Reg. Ref. 16/126 (ABP Ref 246902) - 10-year permission for construction of a solar PV energy development within a total site area of 28.8HA and all ancillary site development works was granted with revised conditions on 15/11/2016. The permitted development is located in Drumroe, Cappoquin, Co. Waterford.

Tipperary Reg. Ref. 17/600582 (ABP Ref. 249015) - Solar farm and all associated works located in Magherareagh, Ardfinnan, Co. Tipperary was granted with conditions on 4/12/2018.

Waterford Reg. Ref. 18/598 (ABP Ref. 303576) - Proposed Solar Farm at Poulbautia, Cappoquin County Waterford was granted with conditions on 28/05/2019.

Waterford Reg. Ref. 15/614 - A solar farm comprising photovoltaic panels on ground mounted frames, 2 no. single storey inverter/transformer stations, 1 no. single storey delivery station, security fencing, CCTV, and all associated ancillary development works was granted with conditions on 01/02/2016. The permitted development is located in Kilcannon Cappagh, Dungarvan.

Waterford Reg. Ref. 17/156 – Permission for a 10-year solar farm and all associated works in Killadangan, Dungarvan, Co. Waterford. Permission was granted on 16/06/2017.

Tipperary Reg. Ref. 16/600465 (ABP Ref. 247443) – Permissions for a solar PV installation in Loughlohery, Cahir, Co. Tipperary. Permission was granted on 03/02/2017.

Tipperary Reg. Ref. 16/600565 (ABP Ref. 247589) – Permission for a 10-year solar farm and all associated works in Monaraha, Cahir, Co. Tipperary. Permission granted on 06/02/2017.

Tipperary Reg. Ref. 23/172 (ABP Ref. 319664) – Permission for a 10-year solar farm and all associated works at lands to the north of the N24 National Road in the townlands of Jamestown, Kilmolash Upper, and Rathkeevin County Tipperary. Permission was granted on 21/08/2024.

Quarry

Waterford Reg. Ref. 21/7772 (ABP Ref. 313939) – A proposed extension of satellite quarry to 13.6 hectares, construction of 40m concrete tunnel underpass, and construction and operation of new concrete batching facility, for up to 20 years, and accompanied by a NIS and EIAR is located in Cappagh Quarry, Ballykennedy, Kilgreany and Canty Townlands, Cappagh, Dungarvan Co. Waterford. A decision was due on 01/11/2022, but at the time of authoring this chapter, a decision was not made on this application.

Waste Facility

Waterford Reg. Ref. 16/729 – Permission to construct an anaerobic digestion and organic fertilizer production unit, comprising 1 No. digester tank, 1 No. treatment unit, 1 No. storage tank, 1 No. combined heat and power unit, 1 No. flare and all associated site works was granted on 15/02/2017. The permitted development is located in Ballynameelagh, Cappagh, Co. Waterford.

Projects Considered within the Proposed GCR Study Area
Below are key relevant planning applications surrounding the proposed GCR which have been selected based on their potential for cumulative effects:

Waterford Reg. Ref. 16/706- Permission to continue the use of the existing 36 metre high, free standing lattice communication structure, carrying antennae and communication dishes, within an existing 2.4metre high palisade fence compound, previously granted time limited consent LPA Ref. 12/35 (An Bord Pleanála Ref. PL.24.240510) at ESB Telecoms Ltd existing telecommunication compound was granted 03/02/2017.

Waterford Reg. Ref. 17/83– Permission for the construction of a cattle underpass and associated works was granted 05/05/2017.

Waterford Reg. Ref. 21/666- SECTION 254 permission for the proposed 18m Alpha 2.0 Street pole Solution with Aw3871 multi-operator Alpha antenna and ground equipment was granted 27/04/2022.

Waterford Reg. Ref. 21/918- Permission granted for a 67-no. space permanent car park (to replace that for which retention is sought), a pedestrian crossing to public roadway the L7001 was granted 12/07/2022.

Waterford Reg. Ref. 23/333- Section 254 Licence permission for erection of new over ground fibre optic cables on existing timber poles and erection of new poles and associated fibre cables at Dungarvan/Lismore MD, Co. Waterford. Permission was granted on 12/03/2024.

Projects Considered within the Proposed TDR Study Area
Waterford Reg. Ref. 24/137- Permission for the change of use of part of the building from Cold Storage presently to that of a Packaging/Processing Area together with all associated site works at QK Coldstores LTD., Carrolls Cross, Ballyshunnock Kilmacthomas. Permission was granted on 30/09/2024.

Waterford Reg. Ref. 24/60589 – Permission to amend planning permission ref: 17/156 which is in respect of a 10-year permission for the construction of a 5MW solar PV farm to enhance the Battery Energy Storage System facility (BESS) and associated infrastructure via installation of 48 no. BESS units and associated works at Killadangan, Dungarvan, Co. Waterford. Permission was granted on 25/11/2024.

Kilkenny Reg. Ref. 24/60103- Permission for development on lands with a site area of approximately 11.57ha located at Gorteens, Co. Kilkenny. The development will consist of the construction of an integrated plasterboard manufacturing facility, incorporating a production plant with access from the industrial area road infrastructure. A decision is due for this application.

Summary of Potential Cumulative Effects
Within the wind farm study area, there are a number of other wind farm developments and grid connections that have the potential to result in cumulative impacts in combination with the proposed wind farm. Potential impacts may arise in relation to landscape and visual, traffic and biodiversity impacts during construction works.

During operational phase, the primary impacts are anticipated to be visual. A detailed assessment of visual impacts in combination with other wind farm development and their effects in various viewshed receptors such as scenic routes, protected views, centres of population, etc, in the area is conducted within Chapter 13 (Landscape and Visual Impacts).

There is also potential for cumulative impacts anticipated from the permitted quary in terms of traffic impacts and overlap of haul routes and TDR.

Within the GCR study area, there is a combination of various small scale development which might have the potential to result in cumulative impacts, such as, a cattle underpass, street pole, car park, pedestrial crossing and an agricultural entrance which could impact the traffic levels and road safety along the GCR.

A list of all permitted and proposed developments considered within the 3 no. study areas are provided in **Appendix 4-1** of this chapter, that can be considered cumulatively with the proposed project.

4.3 PLANNING AND DEVELOPMENT POLICY CONTEXT

When considering wind as an energy source, it is important to place its development within the international, national, and local policy context from the perspective of climate, environment, energy, and planning. This section outlines the legislative mechanisms and requirements from a global to local level, which have been formulated to support the generation of energy from renewable sources and reduce the dependency on fossil fuels and support national energy security.

The Irish planning policy system (see **Figure 4-1** below) is set within a hierarchical structure. National planning policy is informed by EU Directives, Planning Legislation, Ministerial Guidelines. Government Policy and Capital programmes.

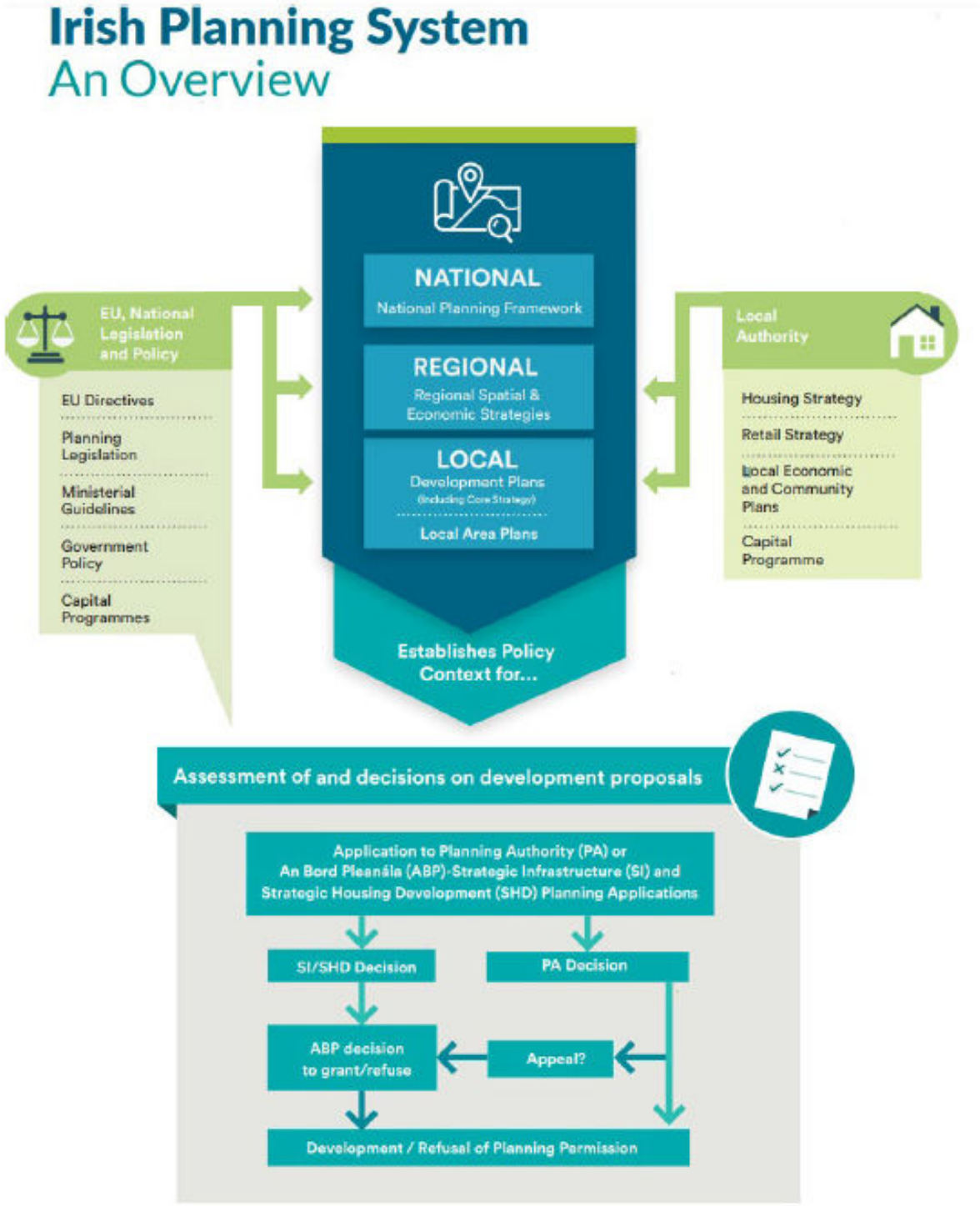

Figure 4-1: The Irish Planning System Overview[7]

[7] Project Ireland 2040, National Planning Framework.

4.3.1 International Policy

This section sets out policy context in chronological order under a series of sub-headings as follows and covers international climate and energy policy:

The 1992 United Nations Framework Convention on Climate Change

The United Nations Framework Convention on Climate Change (UNFCCC) is an international environmental treaty negotiated at the United Nations Conference on Environment and Development (UNCED), in Rio de Janeiro in **1992**. Fifty countries ratified an international treaty, the United Nations Framework Convention on Climate Change (UNFCCC), as a framework for international efforts to combat the challenge posed by climate change. The UNFCCC seeks to limit average global temperature increases and the resulting climate change. In addition, the UNFCCC seeks to cope with effects that are already inevitable. It recognises that the climate system is a shared resource whose stability can be affected by industrial and other emissions of carbon dioxide and other greenhouse gases.

The framework set no binding limits on greenhouse gas emissions for individual countries and contained no enforcement mechanisms. Instead, the framework outlined how specific international treaties (called "Protocols" or "Agreements") may be negotiated to set binding limits on greenhouse gases. The convention enjoys near universal membership, with 197 countries listed as being Parties to the Convention[8].

Energy Roadmap 2050

The Energy Roadmap 2050 was published by the European Commission in **2011** and explores the transition of the energy system in ways that would be compatible with the greenhouse gas reductions targets set out in the Renewable Energy Directive 2009, while also increasing competitiveness and security of supply. To achieve these goals, the Roadmap states that significant investments need to be made in new low-carbon technologies, renewable energy, energy efficiency, and grid infrastructure. Four main routes are identified to achieving a more sustainable, competitive and secure energy system in 2050:

- Energy efficiency;
- Renewable energy,
- Nuclear energy; and
- Carbon capture and storage.

The Roadmap combined these routes in different ways to create and analyse seven possible scenarios for 2050. The analysis found that decarbonising the energy system is technically and economically feasible. Each of the scenarios in the analysis found that increasing the share of renewable energy and using energy more efficiently are crucial, irrespective of the particular energy mix chosen.

Europe 2030 Climate and Energy Framework

EU leaders agreed in October **2014** on new climate and energy objectives for 2030 following a proposal put forward by the European Commission. The 2030 framework aims to make the EU's economy and energy system more competitive, secure and sustainable.

A centrepiece of the 2030 framework is the binding domestic target to reduce greenhouse gas emissions by 40% below 1990 levels by 2030. This will put the EU on the most cost-effective path towards its agreed objective of an 80-95% reduction by 2050. EU leaders also agreed on raising the share of renewable energy to at least 27%.

[8] https://ec.europa.eu/knowledge4policy/organisation/unfccc-united-nations-framework-convention-climate-change_en

As of June 2018, the EU has increased its target of 27% of energy from renewable sources by 2030 to 32% which also includes a clause to allow for a further increase in the target by 2023. In 2023, a renewed target was set via the amended Renewable Energy Directive to 42.5% of energy from renewables but aiming for 45%. This amended target is a clear indication that increased renewable energy remains at the forefront of both EU and national energy policy historically and into the future.

An update to this framework was adopted in July 2021 with a view to 'make the EU's climate, energy, transport and taxation policies fit for reducing net greenhouse gas emissions by at least 55% by 2030, compared to 1990 levels.' This was done to enable the EU to move towards a 'climate-neutral' economy.

The Paris Agreement 2015

This is a legally binding International Treaty on climate change within the United Nations Framework Convention on Climate Change (UNFCCC) dealing with greenhouse gas emissions mitigation, adaptation and finance, starting in the year 2020, which aims to keep the global average temperature rise this century to below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius.

In 2016, the threshold for entry into the agreement was adopted and came into force. Ireland is legally bound by Article 7 of the United Nations COP21 Paris Agreement to prepare and submit periodic updates on its national adaptation and mitigation plans in the global effort to keep global warming below 1.5 °C.

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

The Conference of the Parties, more commonly known as COP, is held annually to agree policies for limiting global temperature rises and policies for adapting to impacts associated with climate change.

In 2021, the following agreements were reached by participating parties under COP26:

- Recognition that impacts from climate change will be lower at a temperature increase of 1.5 °C when compared with an increase of 2 °C;
- A request for participating countries to provide stronger national action plans for the year 2022 instead of the original agreed timeline of 2025;
- Agreement for participating nations to phase-down coal power and phase-out inefficient fossil fuel subsidies;
- A reaffirmed commitment by all parties to deliver financial aid to developing countries with a request for this aid to be doubled;
- An agreement on issues contained within the "Paris Rulebook", pertaining to operational details for the practical implementation of the Paris Agreement;
- An acknowledgment that the impacts of climate change are increasing with developing nations especially affected;
- Agreement to strengthen the Santiago Network for the connection of at-risk countries for the provision of assistance, knowledge and resources.

More recently, COP 28 introduced the first global 'stocktake' which is a process for countries and stakeholders to see where they're collectively making progress towards meeting the goals of the Paris Climate Change Agreement and where they're not. The first global stocktake affirmed that we are not on track to limit global warming to 1.5 degrees Celsius and the window for meaningful change is quickly closing due to slow progress in reducing greenhouse gas emissions, strengthening climate resilience, and providing financial and technological support to vulnerable nations. Countries decided to accelerate action by 2030, including a call for governments to transition from fossil fuels to renewables like wind and solar power.

Renewable Energy Directive 2009/28/EC & Recast Directive 2018/2001/EU

Directive 2009/28/EC on the promotion of the use of energy from renewable sources, known as the "Renewable Energy Directive", implements one of the 20-20-20 targets from the EU's 2020 climate and energy framework, which is:

> "*Raising the share of EU energy consumption produced from renewable resources to 20%*"

The Directive sets national binding targets for all EU countries with the overall aim of making renewable energy sources account by 2020 for 20% of EU energy and for 10% of energy specifically in the transport sector (both measured in terms of gross final energy consumption, i.e., total energy consumed from all sources, including renewables). Ireland has a binding national overall target for renewable energy consumption of 16% in 2020.

In December 2018, the recast Renewable Energy Directive 2018/2001/EU entered into force, as part of the Clean energy for all Europeans package, aimed at keeping the EU a global leader in renewables and, more broadly, helping the EU to meet its emissions reduction commitments under the Paris Agreement. The recast directive moved the legal framework to 2030 and set 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 and comprised measures for the different sectors to facilitate this target. This included new provisions for enabling self-consumption of renewable energy, an increased 14 % target for the share of renewable fuels in transport by 2030 and strengthened criteria for ensuring bioenergy sustainability. The 2019 Green Deal amended the Renewable Energy Directive, and set a new 2030 target of 40% (up from 32%) energy use from renewables by 2030 and strengthening bioenergy sustainability criteria.

In 2023, the Directive was further amended to set a current binding renewable energy target of at least 42.5% at EU level, but aiming for 45%, emphasising a growing obligation to renewable energy sources.

Renewables Go-To Areas

More recently, in accordance with the Green Deal and REPowerEU initiatives, the European Parliament decided to increase the deployment of renewable energy in October 2023 in the form of an update to the Renewable Energy Directive (RED).
The legislation aims to expedite the permitting process for new or modified renewable energy installations, such as wind turbines and solar panels. If a new renewable energy plant is situated in a "renewables go-to area," national authorities should approve it in no more than a year. Outside of these designated areas, the procedure should not exceed 24 months.

Member states are to map the areas necessary for national contributions towards the 2030 renewable energy target within 18 months after the entry into force of this directive; adopt a plan or plans designating 'renewables go-to areas' within 30 months; and adopt mitigation measures that counter the potential adverse environmental consequences of development activities of the projects located in each go-to area.

The European Green Deal 2019

The European Green Deal **2019** reset the European Commission's commitment to tackling climate and environmental-related challenges. It is a growth strategy that aims to transform the EU into a fair and prosperous society, with a modern, resource-efficient and competitive economy where there are no net emissions of greenhouse gases in 2050 and where economic growth is decoupled from resource use. The various elements of the deal are indicated in the infographic below:

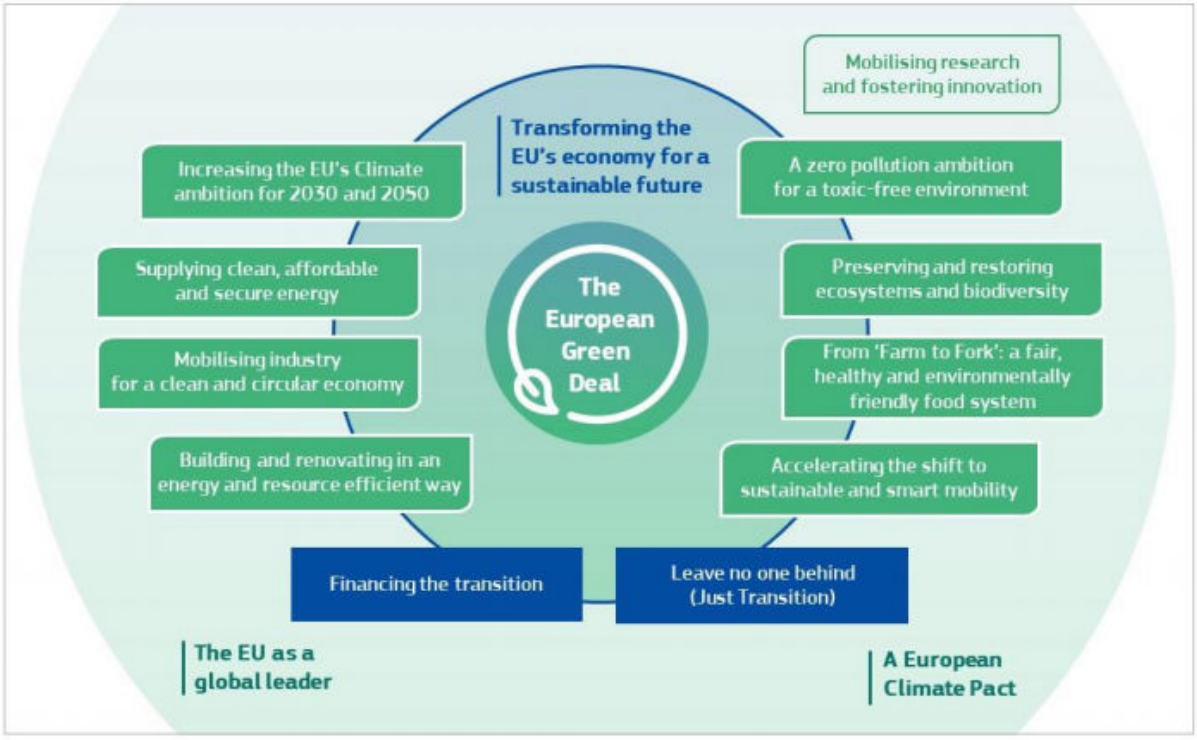

Figure 4-2: Elements of the Green Deal[9]

First climate action initiatives under the Green Deal include:

- European Climate Law to enshrine the 2050 climate-neutrality objective into EU law;
- European Climate Pact to engage citizens and all parts of society in climate action.

Based on a comprehensive impact assessment, analysis of the national energy and climate plans, and considering stakeholder contributions received to the public consultation, the Commission proposed a new EU ambition to reduce greenhouse gas emissions by 2030.

[9] https://ec.europa.eu/info/sites/info/files/european-green-deal-communication_en.pdf

In **July 2021**, the European Commission launched the first tranche of its **'Fit for 55**' measures that will support Europe's climate policy framework and put the EU on track for a 55% reduction in carbon emissions by 2030, and net-zero emissions by 2050. The interconnected proposals cover areas of climate, land use, energy, transport and taxation to bring them into line with the targets agreed in the European Climate Law. The package is comprised of thirteen proposals; eight of them are revisions to existing laws and five are new proposals:

Revisions:

- Revision to the EU Emission Trading Scheme, to lower the overall emissions cap per economic sector, phase out free emission allowances for aviation, and include shipping for the first time;
- Revision to the Effort Sharing Regulation, assigning stronger reduction targets for each Member State in building, road, domestic maritime transport, agriculture, waste and small industry sectors;
- Revision to the Regulation on Land Use, Land Use Change and Forestry, setting an overall EU target for carbon removals by natural sinks and setting national targets;
- Amendment of the Renewable Energy Directive, setting a new 2030 target of 40% (up from 32%) energy use from renewables by 2030 and strengthening bioenergy sustainability criteria;
- Amendment of the Energy Efficiency Directive setting a more ambitious binding annual target at EU level, raised from 32.5% to 36%;
- Amendment of the regulation setting CO2 emission standards for cars and vans requiring average emissions of new cars to come down by 55% from 2021 to 2030 and net-zero by 2035;
- Revision to the Alternative Fuels Infrastructure Directive to require aircraft and ships have access to clean energy supply in major ports and airports; and
- Revision of the Energy Taxation Directive to align taxation of energy products with climate policies and promote clean technologies.

New initiatives:

- An EU Forest Strategy to improve quality, quantity and resilience of EU forests, ensure sustainable use of biomass, and plant three billion trees by 2030;
- The Carbon Border Adjustment Mechanism to place a carbon price on imports and prevent EU companies being undercut by energy-intensive competitors;
- A Social Climate Fund to help citizens finance investment in energy efficiency, clean mobility and renewable energy;
- The ReFuelEU Aviation Initiative to oblige fuel suppliers to blend more sustainable aviation fuels in jet fuel, including e-fuels; and
- The FuelEU Maritime Initiative to stimulate uptake of sustainable maritime fuels and zero-emission technologies.

Further proposals and amendments are expected, including a revision of the Energy Performance of Buildings Directive, and new Climate, Energy and Environmental State Aid Guidelines.

REPowerEU Plan & Council Regulation (EU) 2022/2577

A REPowerEU Plan was published by the European Commission in **2022** with the purpose of saving energy, producing clean energy and diversifying the supply of energy. The plan was produced in response to Ukraine war to reduce Europe's dependence on Russian fossil fuels.

The Plan contains strategies and measures to phase out the EU's dependency on Russian fossil fuels by the end of the decade by building on the implementation of the European Green Deal and the EU's "Fit for 55" proposals (seeking to cut emissions by at least 55% by 2030). It focuses on diversifying energy sources, accelerating a transition from fossil fuels to clean energy, saving energy, smart investment and reinforcing preparedness.
In support of this plan, Council Regulation (EU) 2022/2577 was adopted on the 22nd of December **2022** to provide a framework to accelerate the deployment of renewable energy.

This regulation has been adopted as a temporary measure for the "fast deployment of renewable energy sources" to "help mitigate the effects of the current energy crises".[10]
One significant measure introduced by the Regulation is the "introduction of a rebuttable presumption that renewable energy projects are of overriding public interest and serving public health and safety for the purposes of the relevant Union environmental legislation, except where there is clear evidence that those projects have major adverse effects on the environment which cannot be mitigated or compensated for".[11]

This regulation indicates the international support for the proposed project as it contributes to the much-needed shift away from fossil fuels to clean energy through the production of clean energy, thereby reducing GHG emissions from the electricity sector and highlights the level of urgency required in the deployment of renewable energy projects.

International Policy Summary & Conclusion

While it doesn't impose binding limits, the UN Framework Convention on Climate Change (UNFCCC), established in 1992 began to recognise a framework outlining how to go about negotiating and setting binding limits on greenhouse gases.

Several years later, the Renewable Energy Directive (RED) was introduced in 2009 and still serves as the legal framework for clean energy development across all sectors of the EU economy and set. The RED has significantly increased the share of renewable energy sources in the EU consumption with the revised directive (EU/2018/2001), effective from 2023, setting a binding target of at least 42.5% renewable energy by 2030 (with an aim for 45%). It also streamlines permitting procedures for new renewable energy projects, including solar panels and wind turbines.

By prioritizing renewables, the EU reduces dependency on external energy suppliers and promotes domestically produced, cost-effective energy. Recent developments include raising the 2030 target to 40% (from 32%) in the 'Fit for 55' package, and further increasing it to 45% following geopolitical events. The EU remains committed to sustainability, energy security, and competitiveness through its renewable energy policies.

The introduction of a rebuttable presumption that renewable energy projects are of overriding public interest as introduced by the Council Regulation (EU) 2022/2577 presents direct support for the proposed project as this EIAR finds that there are no anticipated adverse effects on the environment that cannot be mitigated or compensated for. Additionally, the obligations for member states to designate 'renewable go to areas' was brought about to accelerate the consenting of renewable energy development at appropriate locations.

It is clear from the conclusions of the Natura Impact Assessment which accompanies this application, that there is no potential for adverse effects on any designated site (Natura site) from the proposed project including mitigation measures. The NIS concludes that,

[10] https://eur-lex.europa.eu/eli/reg/2022/2577
[11] https://eur-lex.europa.eu/eli/reg/2022/2577

''In line with the provisions of Article 6 of the Habitats Directive 92/43/EEC, an analysis and evaluation of the relevant information including, in particular, the nature of the proposed development, including mitigation measures, characteristics of the qualifying interests, the potential link between the proposed development and the Blackwater River (Cork/Waterford) SAC, the Blackwater Estuary SPA and the Dungarvan Harbour SPA, no significant adverse effects on the integrity of any European sites during development and operation of the proposed development is anticipated, either alone or in-combination with any other plans or projects, and there is no scientific doubt in relation to this conclusion.''

As such the rebuttal presumption is not triggered. However, if it is appropriate to trigger this measure in relation to sites that are afforded the highest level of European protection, it is even more appropriate to permit applications in areas that do not trigger this consideration such as the proposed project.

The importance and urgency of reducing emission to combat global warming was reemphasised at COP28 held in December 2023 which found that we are not on track to limit global warming to 1.5 degrees Celsius and resulted several countries urging governments to shift from fossil fuels to renewable energy sources like wind and solar power.

As such, there is significant policy support for the accelerated development and delivery of renewable energy at EU level. The trends over the last number of years have been of ever-increasing targets for renewable energy deployment and increased policy support.

4.3.2 National Policy Context

This section sets out national climate and energy regulation and policy along with other select environmental policy relevant to the proposed project.

4.3.2.1 National Climate Action Legislation

The relevant EU and international policy and legislation outlined above are transposed into the Irish context through the introduction of the Climate Action and Low Carbon Development Act 2015 (as amended). This Act guides the preparation of Ireland's long term climate action strategies, climate action plans, national climate change adaptation frameworks and carbon budgets which all act as overarching national climate action policies and targets within the State.

Climate Action and Low Carbon Development Act 2015

This Act provides the statutory basis for the national transition objective set in the national policy position. It commits Ireland to being carbon neutral by 2050 and to also match Ireland's targets with those of the EU. It requires that the Minister for Communications, Climate Action, and the Environment must make and submit to Government a series of successive National Mitigation Plans and National Adaptation Frameworks. While there are no explicit targets set out within the Act itself, the legislation obliges the State to consider any existing obligations of the State under the law of the European Union or any international agreement. In effect the Act formally obliges the State to adhere to EU targets.

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

The purpose of the Climate Action and Low Carbon Development (Amendment) Act, 2021 is to provide for the approval of plans '*for the purpose of pursuing the transition to a climate resilient and climate neutral economy by the end of the year 2050*'. The 2021 Climate Act also '*provides for carbon budgets and a decarbonisation target range for certain sectors of the economy*'. The 2021 Climate Act removes any reference to a national mitigation plan and instead refers to both the Climate Action Plan, and a series of National Long Term Climate Action Strategies.

In addition, the local authority shall prepare a 'local authority climate action plan' lasting five years which specifies the mitigation measures and the adaptation measures to be adopted by the local authority. This represents a mandate for Local Authorities to adapt to climate change. The Act has set a target of a 51% reduction in the total amount of greenhouse gases over the course of the first two carbon periods ending 31 December 2030 relative to 2018 annual emissions. The 2021 Climate Act defines the carbon budget as 'the total amount of greenhouse gas emissions that are permitted during the budget period'.
The Act also outlines duties for certain bodies (which includes consenting authorities) under Article 15 (1) as follows:

> *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 Planning Statement attached with this planning application further discusses the obligations of the consenting authority introduced by the Article 15 of the amendment act.

4.3.2.2 National Climate and Energy Policy

The sections below set out the various climate and energy policy documents relevant to the proposed project.

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

The Government White Paper entitled *Ireland's Transition to a Low Carbon Energy Future 2015-2030* sets out a framework to guide Ireland's energy policy development. This White Paper is an update of the 2007 White Paper and sets out a framework to guide policy and actions that the Irish Government intends to take in the energy sector up to 2030 and also reaching out to 2050. The framework was developed in the context of the significant role played by European institutions in determining energy policy, markets and regulation. Similarly, it takes account of European and international climate change objectives, in particular the Renewable Energy Directive.

The Energy Vision 2050 established in the White Paper describes a 'radical transformation' of Ireland's energy system which it is hoped will result in GHG emissions from the energy sector reducing by between 80% and 95%, compared to 1990 levels. This means that the diversification of energy supply during the national transition to a renewable energy system will need to shift away from carbon-intensive fuels such as peat and coal in favour of lower carbon fuels like natural gas.

The White Paper notes that:

> " *Renewable energy will also play a central role in the transition to low carbon energy. No single renewable energy technology – existing or emerging – will alone enable Ireland to overcome the low carbon challenge. Rather, a diverse range of technologies will be required along the supply chains for electricity, heat and transport*".
>
> " *Onshore wind continues to be the main contributor (18.2% of total generation and 81% of RES-E in 2014). It is a proven technology and Ireland's abundant wind resource means that a wind generator in Ireland generates more electricity than similar installations in other countries".*

The White Paper recognizes that the 2020 target of 40% renewables energy was likely to require a total of 3,500-4,000 MW of onshore renewables generation capacity, compared to the 2,500 MW available at the end of December 2014.

National Planning Framework (NPF)

Ireland 2040 - National Planning Framework, hereafter referred to as the NPF, published by the Government in February 2018, is a 20-year planning framework designed to guide public and private investment, to create and promote opportunities for Irish citizens, and to protect and enhance Ireland's built and natural environment. The new framework sets out five strategic actions required to achieve this vision:

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

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

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

The NPF covers a wide range of national policy objectives and National Strategic Outcomes (NSO). The key outcome provided for under NSO 8 is '*the transition our society to a low carbon and more climate resilient society'*. The NSO states that '*new energy systems and transmission grids will be necessary for a more distributed, more renewables focused energy generation 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*'.

The NSO goes on to state that 'diversification of our energy production systems away from fossil fuels and towards green energy such as wind, wave, solar and biomass, together with smart energy systems and the conversion of the built environment into both generator/consumer of energy and the electrification of transport fleets will require the progressive and strategic development of a different form of energy grid'.

However, those most relevant in the overall context of wind energy development are as follows:

Table 4-1: National Strategic Outcomes

National Policy Objective (NPO)	Description
NPO 23	Facilitate the development of the rural economy through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture, energy and extractive industries, the bioeconomy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism.
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.
NPO 59	Enhance the conservation status and improve the management of protected areas and protected species by: Implementing relevant EU Directives to protect Ireland's environment and wildlife; Integrating policies and objectives for the protection and restoration of biodiversity in statutory development plans; Developing and utilizing licensing and consent systems to facilitate sustainable activities within Natura 2000 sites; continued research, survey programs and monitoring of habitats and species.
NPO 60	Conserve and enhance the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance.
NPO 65	Promote the pro-active management of noise where it is likely to have significant adverse effects on health and quality of life and support the aims of the Environmental Noise Regulations through national planning guidance and Noise Action Plans.

In summary the key steps indicated for delivering on a low carbon society are as follows:

- Delivery of 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;
- Reinforce the distribution network and transmission network to facilitate planned growth;
- Strengthen energy security ad resilience to support an island population of 8 million people;
- Consideration of carbon neutral electricity generation that would be facilitated through harnessing carbon capture and storage;
- Interconnectors offer the opportunity to connect to the EU Grid system; and

Planning legislation provides for the Government to revise or replace the NPF every six years. An updated revised draft of the NPF was published in November 2024.

The draft revised NPF retains the original NPF focus on a more balanced distribution of growth across all of Ireland's regions and emphasising the potential for regional growth to harness the attractiveness and assets of all regions and places to a greater extent than ever before.

The revised NPF amends the previous National Strategic Outcome 8 (which outlines the key steps to 'transition to a low carbon and climate resilient society') to reflect the updated legally binding renewable energy and greenhouse gas emissions targets.

Additionally, Chapter 9.2 of the NPF sets out Regional Renewable electricity Capacity Allocations as seen in the figure below. The proposed project is located in the Southern region for which 978MW of additional renewable power capacity has been allocated and aiming to achieve 40% of the total national share in 2030.

Region	Energised capacity 2023 (MW)	Additional Renewable Power Capacity Allocations (MW)	Total % of National Share in 2030	Energised Capacity 2023 (MW)	Additional Renewable Power Capacity Allocations (MW)	Total % of National Share in 2030
	Onshore Wind			Solar PV		
Eastern and Midlands	284	1,966	25%	306	3,294	45%
Northern and Western	1,761	1,389	35%	0.3	959	12%
Southern	2,622	978	40%	138	3,302	43%
Total	**4,667**	**4,333**		**445**	**7,555**	

Figure 4-3:Regional Renewable Energy Capacity Allocations

National Development Plan 2021-2030

The National Development Plan 2021-2030, hereafter referred to as the NDP, sets out the investment priorities at national, regional and local planning levels that will facilitate the implementation of the NPF.

In the context of the energy sector, the principle objective of the NDP is to assist in ensuring a 'long-term, sustainable and competitive energy future for Ireland'. Targeted investment within regulated network infrastructure ensures that Ireland's power grid is:

- Maintained to the highest international safety standards;
- Fit for purpose in the medium to longer-term in order to meet projected demand levels; and
- Meets the challenge of integrating world-leading levels of renewable energy.

The NDP recognises that the national objective of transitioning by 2050 to a competitive low-carbon, climate resilient, and environmentally sustainable economy and society must influence public capital investment choices over the next 10 years. It acknowledges that Ireland's energy system requires a radical overhaul to achieve its energy and climate objectives by 2050. This means how energy in Ireland is generated and used needs to fundamentally change.

The NDP states that investment in renewable energy sources, ongoing capacity renewal, and future technology affords Ireland the opportunity to comprehensively decarbonise our energy generation. Renewable energy, including wind technology, will play a key role in helping to diversify away from a reliance on fossil fuels.

National Policy Objective 55 of the NPF has a stated aim to:

> "*Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050.*"

Renewable Electricity Support Scheme (RESS)

RESS is a Renewable Electricity Support Scheme, which provides financial support to renewable electricity projects in Ireland. It is a pivotal component of the National Energy and Climate Plan and is essential for achieving Ireland's renewable electricity target by 2030, with a primary focus on cost effectiveness, the RESS will deliver a broader range of policy objectives, including:

- An enabling framework for community participation through the provision of pathways and supports for communities to participate in renewable energy projects;
- Increasing technology diversity by broadening the renewable electricity technology mix (the diversity of technologies);
- Delivering an ambitious renewable electricity policy to 2030; and
- Increasing energy security, energy sustainability and ensuring the cost effectiveness of energy policy.

On 27th February 2020, the Department of Communications, Climate Action and Energy published the final terms and conditions for the first competition under the Scheme. The RESS will be implemented through a series of renewable electricity competitions, providing a renewable electricity roadmap and indicative timelines and capabilities.

The first RESS auction (RESS 1) was delivered by a number of organisations and agencies, namely the DCCAE, Commission for Regulation of Utilities (CRU) and EirGrid, working together. RESS 1 took place in August 2020. A total of 114 projects applied to participate, with 82 successful projects.

Following this, the Renewably Electricity Scheme 2 (RESS 2) auction process commenced with qualification for RESS 2 opening in December 2021. The auction sought to support the implementation of the National Development Plan (NDP) and the Climate Action Plan 2021 (CAP21) to secure new renewable energy targets of 80% renewable electricity by 2030. The scheme is crucial in helping Ireland to meet new climate targets and ambitions.The successful projects in RESS 2 represented a potential increase of nearly 20% in Ireland's current renewable energy generation capacity; 2,748 GWh of the 3,772 GWh bids submitted were successful in the auction. This equates to approximately 414 MW of onshore wind and 1,534 MW of solar. These projects will be delivered between 2023 and 2025.
RESS 3 is the third Onshore Renewable Electricity Support Scheme by the Government of Ireland and is a pivotal component of the Programme for Government and the Climate Action Plan 2023. RESS 3 uses a competitive auction process to determine which generators receive support. For projects that are successful in the RESS 3 Auction, this support typically applies for approximately 15 years. As quoted from KPMG insights[12] in the auction,

> *''...contracts were awarded to only three wind farms for a total capacity of 148 MW, and to just under 500 MW of solar. The total annual generation from this capacity is expected to be 934 GWh, which is significantly short of the indicative auction volume of 2,000 – 3,500 GWh targeted by the Department of the Environment, Climate and Communications to meet Ireland's 2030 80% RES-E target."*

Renewable energy projects supported through the RESS scheme are required to provide a community benefit fund for the area local to the proposed project. This is to ensure that communities most effected by the transition to a greener energy system receive the greatest benefit. This a policy initiative to deliver on CAP21.

The terms of the fund are set out under the RESS Good Practice Principles Handbook for Community Benefit Funds. The handbook is in place to ensure there is a good relationship between the developers and communities to ensure they work together to maximise the benefits of the funds to local communities living in proximity to RESS Projects.

Key stakeholders involved are the community, the developer, the fund committee, and the administrator. Ultimately the developer is responsible for ensuring the fund is compliant with the RESS meaning there are limits.

The most recent RESS auction (RESS 3) indicates a significant reduction in wind farm developments awarded contracts which relates to a decline in the quantum of wind farm development consented/granted planning permission. This in turn has knock on effects on the local community, since RESS auction projects enable the set-up of a community benefit fund. It also directly affects the nation's ability to meet the 80% target for energy sources from renewables.
More recently, a public stakeholder information event on the next RESS (i.e., RESS 4) Terms and Conditions was held on Monday 25 March 2024 with the publication of a consultation response by the Department of the Environment, Climate and Communications expected in due course.

In the event that the proposed project is granted permission, it would directly improve the possibility of securing an RESS contract, which would ultimately lead to a timely delivery of the project. It would also increase the capacity awarded contracts from renewable sources towards achieving national and EU climate action goals, as well as enable the creation of a community benefit fund to be established within the local community.

[12] Update on RESS 3 auction - KPMG Ireland

National Energy Security Framework

The National Energy Security Framework was launched in 2022 to provide an overarching and comprehensive response to Ireland's energy security needs in the context of the war in Ukraine.

The Framework sets out how the government can support households and businesses, with a particular focus on protecting those most at risk of fuel poverty, how it is already ensuring Ireland's energy security, and how it will speed up the country's shift to increased energy efficiency and indigenous renewable energy systems. It also sets out how consumers and businesses can be supported to save energy and save money. The Framework sets actions in response to issues such as ensuring the security of energy supply in the near-term and over the longer term, reducing Ireland's dependency on imported fossil fuels.

Within the context of the proposed project, the framework seeks to replace fossil fuels with renewable energy sources such as wind.

Commission for Regulation of Utilities: Grid Connection Policy

The Commission for Regulation of Utilities (CRU) launched a new grid connection policy in March 2018 for renewable and other generators, known as the Enduring Connection Policy (ECP-1), which sought to allow "shovel ready" projects, that already have a valid planning permission, connect to the electricity networks. The principal objective which guides this decision is to facilitate greater opportunities for advanced projects to connect to the network in addition to preparing for future, more regular batches for connection. In August 2018, the successful applicants for new connection capacity under ECP-1 were published.

On the 10th June 2020, the CRU further published the Enduring Connection Policy – Stage 2 (ECP-2) Decision (CRU/20/060). This decision marked a major milestone in the Enduring Connection Policy regime and provides for three batches of new generation connection offers to access the electricity network.

The number of connection offers represents an increase in ambition from ECP-1 and sets a challenging but achievable programme for the System Operators. This will facilitate new renewable generators competing in forthcoming RESS auctions as well as conventional generators and system service providers.
The application window for the fourth annual batch (ECP-2.4) opened on 1 October 2023 and closed on 30 November 2023. Following the closure of the application window, the batch was formed over the next three months. Three batches have been awarded connection offers in May 2024 where projects having the largest volume of GWhrs/yr generated given highest priority under Category A. Maximum number of connection offers were awarded to solar farms, followed by battery and then wind farms. The ECP 2.4 connection report[13] stated that, the SOs were developing a proposal to commence a pilot of "renewable hubs" to run in parallel with the opening of the ECP-2.4 batch window.

According to the Renewables Hub Pilot Consultation report[14], Renewable Hubs will be established in new or existing substations, with network capacity created based on a known pipeline of projects, with SOs engaging industry stakeholders.

The Renewable Hubs pilot is expected to include some, but not all, of the projects within the batch. In the longer-term the CRU expects that,

[13] Enduring Connection Policy (divio-media.com)
[14] CRU202353_Renewable_Hubs_Pilot_Consultation.PDF (divio-media.com)

''Renewable Hubs will be developed in areas which strike a balance between grid-optimal locations and renewable resources, thus providing locational signals for project developers. This could include targeted hubs in areas that could release significant renewable capacity. "

The introduction of this policy demonstrates the strong policy support to accellerate the grid connection for advanced projects such as renewable energy projects (particularly via the ECP-2 which prioritised large reneable enrgy projects) and to further secure success at RESS auctions. The potential introduction of the 'renewable hubs' could further accellerate delivery of the proposed project.

Climate Action Plan 2024 (CAP 24)

The Climate Action Plan 2024 (CAP24) is the third annual update to Ireland's Climate Action Plan and was approved by Government on 20 December 2023, subject to Strategic Environmental Assessment and Appropriate Assessment, which is currently under public consultation.

CAP24 builds upon CAP23 by refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings. The Plan provides a roadmap for taking decisive action to halve Ireland's emissions by 2030 and reach net zero by no later than 2050, as committed to in the Climate Action and Low Carbon Development (Amendment) Act 2021. It sets out the roadmap to deliver on Ireland's climate ambition and aligns with the legally binding economy-wide carbon budgets and sectoral ceilings that were agreed by Government in July 2022.
Six vital high impact sectors are identified, with Powering Renewables identified as being critical to decarbonising the power sector as well as enabling the electrification of other technologies. The Plan seeks to accelerate the delivery of onshore wind by providing up to 9 GW of onshore wind by 2030. CAP24 also acknowledges that some sectors and communities will be more impacted than others with the costs of transition to a low carbon economy. To address this, CAP24 embodies Just Transition principles, and a Just Transition Commission will be established to provide advice to the Government; and retains one of the most important measures of the previous action plan (CAP23) which is to increase the share of electricity demand generated from renewable energy sources to up to 80% by 2030.

CAP24 notes that in the first half of 2023, 43% of all electricity generated in Ireland came from renewable sources, an increase of 0.9 percentage points on the first half of the previous year. Electricity emissions fell by 1.9% due to an increase in renewable electricity generation, coupled with a reduction in the use of coal, oil and peat generation.

It is recognised that a significant step up is now required to meet 2030 targets and to deliver a decarbonised economy for Ireland by 2050, with key metrics identified as shows in **Figure 4-4** below.

Table 12.5 – Key Metrics to Deliver Abatement in Electricity[71]

Theme	2025 KPI	2025 abatement (vs. 2018) $MtCO_2eq.$	2030 KPI	2030 abatement (vs. 2018) $MtCO_2$ eq.	2031-2035 measures
Accelerate Renewable Energy Generation[72]	50% renewable electricity share of demand 6 GW onshore wind capacity Up to 5 GW solar PV capacity, including at least 1 GW of new non-utility solar	2. 21	80% renewable electricity share of demand 9 GW onshore wind capacity At least 5 GW offshore wind capacity 8 GW solar PV capacity, including 2.5 GW of new non-utility solar Green hydrogen production from renewable electricity surplus generation	7.18	Decarbonisation Roadmap for a net-zero power system Green hydrogen production via 2 GW offshore wind
Accelerate Flexibility	Maximum level of renewables at any one time on the grid: 85% Dispatch down (excluding surplus generation) of renewables below 7% Minimise surplus generation Required long term storage (4 hour plus) in place	See above abatement figure	Maximum level of renewables at any one time on the grid: 95-100% Dispatch down (excluding surplus generation) of renewables below 7% Minimise surplus generation Required additional long-term storage (4 hour plus) in place At least 2 GW of new flexible gas-fired generation Zero-emission gas-fired generation from biomethane and hydrogen commencing by 2030	See above abatement figure	Required additional long duration storage technologies in place Increased zero emission gas-fired generation to enable a net zero power system
Demand Management	Demand side flexibility 15-20% Zero carbon demand growth	2.21	Demand side flexibility 20-30% Zero carbon demand growth	7.18	Demand side flexibility 30% Zero carbon demand growth
Total Estimated Abatement Potential					

Figure 4-4: CAP24 Key Metrics to Deliver Abatement in Electricity

National Energy and Climate Plan (NECP) 2021-2030

The NECP was prepared in 2019 to incorporate all planned policies and measures that were identified up to the end of 2019 and which collectively deliver a 30% reduction by 2030 in non-ETS greenhouse gas emissions (from 2005 levels).The NECP recognises the commitment set out under the Climate Action Plan 2021, to reduce CO2 eq. emissions from the sector by 50–55% relative to 2030.

In accordance with the Governance of the Energy Union and Climate Action Regulation, a draft updated National Energy & Climate Plan (NECP) 2021-2030 was submitted to the European Commission in December 2023. It outlines Ireland's energy and climate policies in detail for the period from 2021 to 2030 and looks onwards to 2050. Table 4 of the draft NECP set out the estimated trajectory for the overall share of Renewable energy, which indicated that Ireland's proposed trajectory will not be in line with the desired trajectory. This is primarily due to the fact that large projects, particularly offshore wind projects, cannot be constructed in shorter timeframes and will not be fully operational by the end of the decade.

This draft was further revised to incorporate comments from the Commission, public consultation and updated policies and targets. A final version of the NECP was submitted in July 2024.

National Policy Summary & Conclusion

The adoption of the Climate Action and Low Carbon Development Act 2015 (as amended) brought the applicable EU and international policies and law into the Irish context and directs the development of Ireland's long-term climate action strategies, plans, national frameworks for climate change adaptation, and carbon budgets to adhere to EU targets. More importantly, the Act outlines that relevant consenting authorities must perform its functions consistent with the latest climate action plans and other national strategies and targets set to combat climate change.

Following this, the Government White Paper was introduced as a framework capturing RED objectives and noted that, a diverse range of renewable energy technologies (onshore wind being the main contributor) will play a central role in the transition to low carbon energy generation. The NPF also further supports this objective and states that strategic development of the energy grid is required to facilitate the delivery and connection of a diverse range of renewable energy generation sources.

However, with the latest trends in RESS schemes, it is evident that there is a decrease in renewable energy projects awarded funding. A KPMG article[15] on the RESS 3 auction highlights a significant failure in Ireland's planning and consenting regime, with limited volumes of renewable projects entering the auction. As such, the country's capacity to reach the 80% objective for renewable energy sources is also directly impacted.

Historically, several policy documents on climate change have emphasised the role and potential of renewable energy generation in reducing GHG emissions to pre-1990 levels and in turn net zero emissions (climate neutrality by 2050) which is the ultimate goal of the EU at present. This is reflected in CAP24, which emphasises the need to accelerate renewable energy generation to 80% with 9GW to come from onshore wind.

[15] Update on RESS 3 auction - KPMG Ireland

The updated NECP submitted to the European Commission finds that currently Ireland is not on track to meet the desired trajectory of renewable energy projects and identifies that this is due to the longer construction timeframes associated with constructing wind farms. This further emphasises that a larger number of wind farm projects must be consented nationally to help contribute to achieving renewable energy targets within a shorter period.

Furthermore, since the pilot program called Renewable Hubs released under the ECP 2.4 aims to optimize grid infrastructure and address challenges posed by increased reneewable energy generation. As such, the proposed project is expected to be supported by this programme as it will facilitate a more robust grid network into which wind power can enter the national grid.

4.4.2.3 National Wind Energy Guidance Documents

Wind Energy Development Guidelines 2006

The Wind Energy Development Guidelines (WEDG) provide statutory guidance for wind energy development, including consideration of environmental issues, such as noise and shadow flicker, design, siting, spatial extent and scale, cumulative effect and spacing, as well as the layout and height of wind turbines having regard to the landscape and other sensitivities. The Guidelines indicate the need for a plan-led approach to wind energy development.

In December 2013, the Minister for Housing and Planning announced a public consultation process in respect of revisions to the 2006 Guidelines. The revisions relate primarily to noise (including distance) and shadow flicker and have yet to be finalised and formally adopted. Until such a time as the new guidelines are published, the 2006 guidelines remain the statutory policy guide in relation to all wind energy developments.

Notwithstanding the long delays that have taken place to date with the publication of new guidelines. The draft wind Energy Revised Guidelines have been in circulation for some time and as such are considered in the following section.

Draft Revised Wind Energy Development Guidelines – December 2019

The review of the Wind Energy Development Guidelines 2006 began with the issuing of draft proposals in December 2013. Following consultation, a preferred draft approach was announced in 2017. Accordingly, the Minister for Housing, Planning and Local Government, Eoghan Murphy, T.D. and the Minister for Communications, Climate Action and Environment, Richard Bruton, T.D., launched a public consultation on proposed revisions to the Wind Energy Development Guidelines on Thursday 12th December 2019.

The Draft Revised Wind Energy Development Guidelines were issued for public consultation and primarily focus on addressing a number of key aspects including noise, visual amenity setback, shadow flicker, community consultation obligations, community dividend and grid connections.[16]

The draft guidelines propose the following main changes to the 2006 Guidelines:

- New noise standards;
- Setback distances;

[16] https://www.housing.gov.ie/sites/default/files/publicconsultation/files/draft_revised_wind_energy_development_guidelines_december_2019.pdf

- Automatic shadow flicker control mechanisms;
- Community consultation;
- Community dividend;
- Grid connections;

Once these Guidelines have been issued under Section 28 of the Planning and Development Act, 2000 (as amended) planning authorities and An Bord Pleanála will be required to have regard to the Guidelines and will be required to apply any specific planning policy requirements of the Guidelines in carrying out their functions under section 28(1C). They will offer advice to planning authorities on planning issues relating to wind energy through the development plan process and in determining applications for planning permission. The guidelines are also intended to ensure a uniform approach throughout the country in the identification of suitable locations for wind energy development and the treatment of planning applications for wind energy developments.

The guidelines state that all development plans including local area plans and wind energy strategies must include both a statement of their policies and objectives in relation to wind energy development and matters it will consider in assessing planning applications for wind energy development proposals. Furthermore, it states that

> *''the assessment of individual wind energy development proposals needs to be conducted within the context of a "plan-led" approach. This involves identifying areas considered suitable or unsuitable for wind energy development, and those which may be open for consideration for wind energy development. These areas should then be set out in the development plan in order to provide clarity for developers, the planning authority, and the public".*

Commenting on the draft guidelines as he launched the public consultation, Minister Murphy said:

> "*After much work, analysis and consultation, we are publishing draft Revised Wind Energy Development Guidelines which are aimed at striking a better balance between addressing the needs of local communities and maintaining Ireland's ability to deliver on its renewable energy ambitions."*
> *"Our aim in these draft guidelines is to provide greater consistency of approach in planning for onshore wind energy development; thereby providing greater certainty and clarity to the planning system, the wind energy industry and to local communities."*

These revised guidelines are still under review and until such time as the new guidelines are published, the 2006 guidelines remain the statutory policy guide in relation to all wind energy developments.

As demonstrated in the subsequent chapters of this EIAR, the proposed project will not result in any likely significant effects on the environment and is in accordance with the principles of proper planning and sustainable development and has been designed such that it is anticipated to be capable of adhering to the draft guidelines.
It should be noted that as the Minister has not yet issued the revised guidelines under Section 28 of the Planning and Development Act 2000 and so they are not currently binding.

Code of Practice for Wind Energy Development in Ireland on Guidelines for Community Engagement (DCCAE, 2016)

In December 2016, the DCCAE published a Code of Practice for Wind Energy Development in Ireland on Guidelines for Community Engagement. The Code cites ten key areas for delivery on the part of wind energy developers and includes measures relating to the various project phases and a guide regarding annual reporting. These include:

1. Contact and visibility;
2. Arrangement for making contacts;
3. Engagement;
4. Compliance with statutory and regulatory obligations;
5. Community benefit;
6. Impact mitigation;
7. Independent advisory and information bodies;
8. Expert professional advice;
9. Ancillary development;
10. Reports.

It is intended to ensure that wind energy development in Ireland is undertaken in observance with the best industry practices, and with the full engagement of communities around the country. Community engagement is required through the different stages of a project, from the initial scoping, feasibility, and concept stages, right through construction to the operational phase. The methods of engagement should reflect the nature of the project and the potential level of impact that it could have on a community.

The proposed project is generally compliant with this code of practice and it delivers on the key areas mentioned above.

4.4.2.4 Other Environmental Policy

The sections below set out other environmental policies relevant to the proposed project in terms of consideration for peatlands, river basins, and biodiversity.

National Peatlands Strategy 2015 to 2025

Ireland is one of the few countries in Europe where blanket bogs are able to establish and is the most important country for this habitat. Irish peatlands are the country's last great area of wilderness, a true wetland habitat, providing services for unusual and unique specialist flora and fauna. Historically they have been under a lot of pressure due to turf cutting and agriculture and the overall habitat condition of peatlands in Ireland is poor. To restore these peatland habitats a number of recommendations were set out in the strategy. The main recommendations include removing part of the livestock present in these areas which will improve recovery of vegetation and wildfire management and prevention.

There are opportunities within this project to accommodate the recommendations of the National Peatlands Strategy 2015 to 2025 by managing livestock and burning activities on peatland habitats (see Chapter 6 – Biodiversity).

River Basin Management Plan 2022-2027 (draft)

The River Basin Management Plan (RBMP) for Ireland 2022-2027 sets out the WFD based actions that Ireland will take to protect and improve water quality and achieve 'good' ecological status in water bodies (rivers, lakes, groundwater, estuaries, coastal water, canals and reservoirs) at the latest by 2027 (DoHLGH, 2021)[17]. The RBMP provides a coordinated framework for improving the quality of our waters - to protect public health, the environment, water amenities and to sustain water-intensive industries, including agri-food and tourism, particularly in rural Ireland.

The first cycle of RBMPs included the Eastern River Basin District - River Basin Management Plan (ERBDMP) 2009 – 2015 (EPA, 2023)[18]. These plans summarised the water bodies that may not meet the environmental objectives of the WFD by 2015 and identified which pressures are contributing to the environmental objectives not being achieved. The plans described the classification results and identified measures that can be introduced in order to safeguard water bodies and meet the environmental objectives of the WFD:

- Prevent deterioration of waterbody status;
- Restore good status to waterbodies;
- Achieve protected area objectives; and
- Reduce chemical pollution of water bodies.

Relevant key issues raised included water quality/pollution, agricultural practices, sewage pollution, forestry and peat extraction.

With effective implementation of the RBMP, it can be expected to see the plan's ambitious suite of measures translated into tangible improvements in water quality in over 700 water bodies around Ireland. Assessment of risks to water quality in planning processes will be enhanced and there will be more analyses of water quality carried out at water catchment level.

National Biodiversity Action Plan 2023-2027 (draft)

Ireland's 4th National Biodiversity Action Plan (NBAP) sets the national biodiversity agenda for the period 2023-2030 and aims to deliver the transformative changes required to the ways in which we value and protect nature. The 4th NBAP strives for a "whole of government, whole of society" approach to the governance and conservation of biodiversity. The aim is to ensure that every citizen, community, business, local authority, semi-state and state agency has an awareness of biodiversity and its importance, and of the implications of its loss, while also understanding how they can act to address the biodiversity emergency as part of a renewed national effort to "act for nature".

[17] DoHLGH (2021) 'River Basin Management Plan for Ireland 2022 - 2027. Third Cycle Draft. Prepared by the Department of Housing, Local Government and Heritage', available: https://www.google.ie/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwi17J_37PWEAxWHUEEAHbOgCQwQFnoECAYQAQ&url=https%3A%2F%2Fassets.gov.ie%2F199144%2F7f9320da-ff2e-4a7d-b238-2e179e3bd98a.pdf&usg=AOvVaw1P2u7sp7ohxCmnF7PP_JMm&opi=89978449 [accessed 15 Mar 2024].

[18] Catchments.ie.

This is the first plan to be published on a statutory basis under the 2023 Act, and the first to impose legal obligations on public bodies. It will continue to implement actions within the framework of five strategic objectives, while addressing new and emerging issues:

- Objective 1 - Adopt a Whole of Government, Whole of Society Approach to Biodiversity
- Objective 2 - Meet Urgent Conservation and Restoration Needs
- Objective 3 - Secure Nature's Contribution to People
- Objective 4 - Enhance the Evidence Base for Action on Biodiversity
- Objective 5 - Strengthen Ireland's Contribution to International Biodiversity Initiatives

'Global trends of biodiversity loss are reflected in Irish land and waterscapes. Intensive agricultural and forestry practices, overfishing, invasive species, changes in land use (particularly for residential, agricultural and commercial development) and the over-exploitation of resources such as peatland are the main drivers of biodiversity loss'.

(DoHLGH, 2023)[19]*.*

4.3.3 Regional Policy Context

Regional Spatial and Economic Strategy (RSES) 2019-2031 for the Southern Region

The RSES is a link between the National Planning Framework, the City & County Development Plans, and the Local Economic & Community Plans. Each assembly is centrally involved in the formulation of policies geared towards achieving a greater dispersal of economic growth and development throughout the region. Local Authorities must update their development plans to be in accordance with the RSES. Draft plans or proposed variations to development plans are referred by the Local Authority to the Regional Assembly to ensure alignment.

The proposed project is located within the Southern Region. The Southern Regional Assembly RSES sets out a vision for the Southern Region to[20]:

- *'Nurture all our places to realise their full potential;*
- *Protect, and enhance our environment;*
- *Successfully combat climate change;*
- *Achieve economic prosperity and improved quality of life for all our citizens;*
- *Accommodate expanded growth and development in suitable locations;*
- *Make the Southern Region one of Europe's most creative, innovative, greenest, and liveable regions'.*

The Southern RSES seeks to achieve balanced regional development and full implementation of Project Ireland 2040 – the National Planning Framework and came into effect on 31st January 2020. The Region has nine counties Cork, Clare, Kerry, Limerick, Tipperary, Waterford, Carlow, Kilkenny, and Wexford which are administered by 10 local authorities. The region is further divided into three sub-regional areas, called Strategic Planning Areas (SPAs) - the Mid-West, Southeast and South-West and Waterford belongs in the Southeast (B) Area.

[19] https://www.gov.ie/en/consultation/1566c-public-consultation-on-irelands-4th-national-biodiversity-action-plan/

[20] https://www.southernassembly.ie/uploads/general-files/Regional_Spatial__Economic_Strategy_for_the_Southern_Region_LOW_RES.pdf

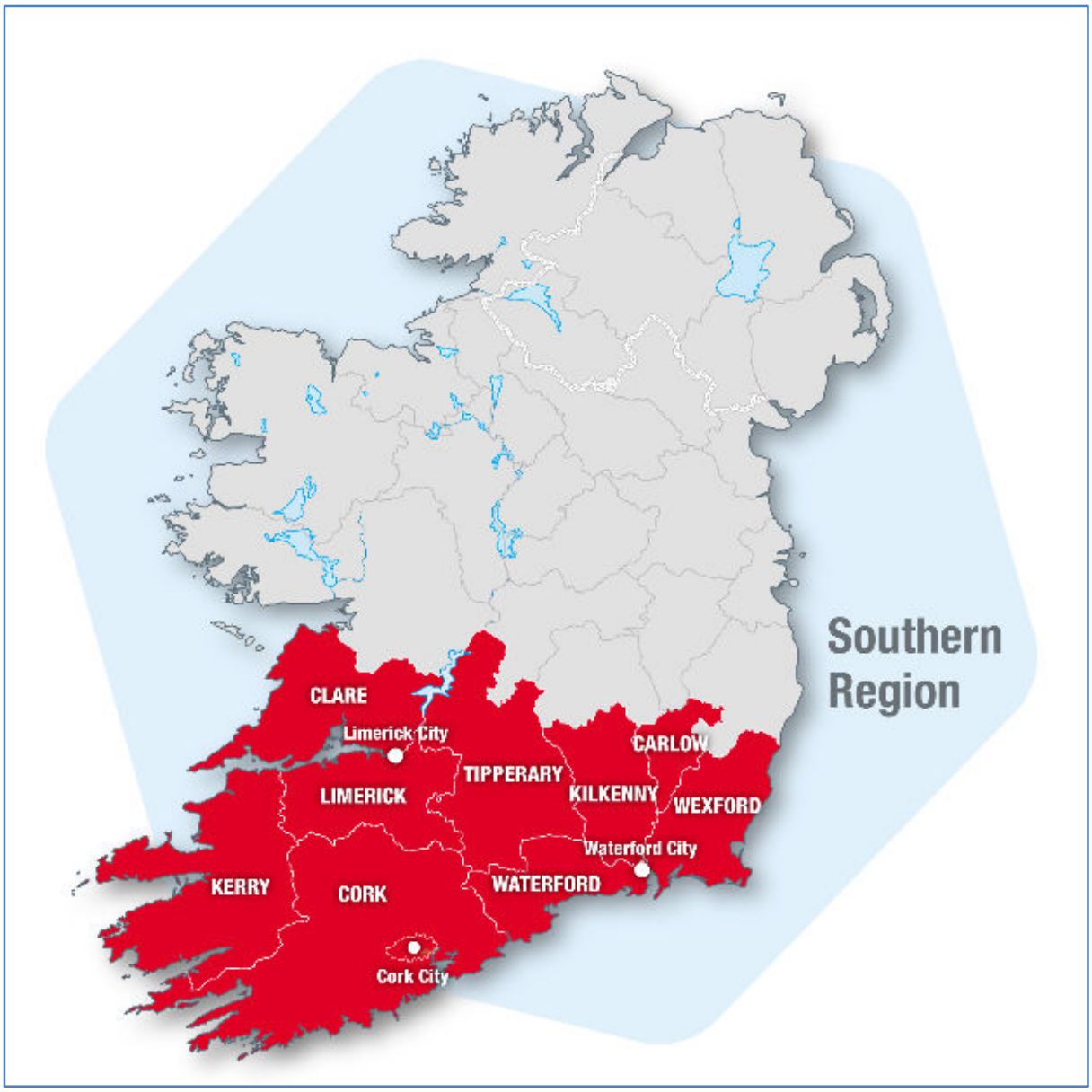

Figure 4-5: RSES Southern Region Spatial Area

The RSES recognises and supports the many opportunities for onshore wind as a major source of renewable energy. It states opportunities for both commercial and community wind energy projects should be harnessed, having regard to the requirements of DoEHLG Guidelines on Wind Energy. It also states that Wind Energy, with current and future developments in technology, has an important role in delivering value and clean electricity for Ireland.

Policies in the RSES relevant to the proposed project are outlined as follows:

Table 4-2: RSES Regional Policy Objectives (Wind and Renewables)

Regional Policy Objective (RPO)	Description
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 95	**Sustainable Renewable Energy Generation:** 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 96	**Integrating Renewable Energy Sources:** It is an objective to support the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure to integrate renewable energy sources and ensure our national and regional energy system remains safe, secure, and ready to meet increased demand as the regional economy grows.
RPO 98	**Regional Renewable Energy Strategy:** It is an objective to support the development of a Regional Renewable Energy Strategy with relevant stakeholders.
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.
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.

The RSES supports the measures outlined in the Climate Action Plan 2024. Supporting actions will focus on renewable energy, energy efficiency, sustainable transport, agriculture and forestry and climate resilience through flood defences. Actions on decarbonisation will be linked to the implementation of the crosscutting measures in the Climate Action Plan 2024, and the National Adaptation Framework in conjunction the work of the Climate Action Regional Offices (CARO).

Section 8.2 of the RSES relates to the Strategic Energy Grid. It notes that the existing infrastructure, developed over many years, represents major and on-going capital and infrastructural investment in strategic national assets and is essential for the continued provision of a secure and reliable electricity supply.

Developing the grid will enable the transmission system to safely accommodate more diverse power flows from surplus regional generation and also to facilitate future growth in electricity demand, particularly from wind. The RSES states that these developments will strengthen the network for all electricity users, and in doing so will improve the security and quality of supply. This is particularly important if the region is to attract high technology industries that depend on a reliable, high-quality, electricity supply. The following regional policy objectives are considered relevant as it supports the proposed grid connection route:

Table 4-3: RSES Regional Policy Objectives (Electrical Grid)

Regional Policy Objective (RPO)	Description
RPO 96	It is an objective to support the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure to integrate renewable energy sources and ensure our national and regional energy system remains safe, secure and ready to meet increased demand as the regional economy grows.
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.
RPO 222	It is an objective to support the development of a safe, secure and reliable supply of electricity and to support and facilitate the development of enhanced electricity networks and facilitate 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) to serve the existing and future needs of the Region and strengthen all-island energy infrastructure and interconnection capacity.

4.3.4 Local Policy Context

Waterford City and County Development Plan 2022-2028

The Waterford City and County Development Plan 2022-2028, hereafter referred to as "the CDP", was adopted on the 7th of June 2022 and came in to effect on the 19th of July 2022. It replaces the following development plans for Waterford:

- Waterford City Development Plan 2013-2019;
- Waterford County Development Plan 2011-2017; and
- Dungarvan Town Development Plan 2012-2018.

The CDP sets out the Council's strategic land use objectives and policies. The vision for County Waterford in the lifetime of the CDP is:

> *"By 2028, Waterford City and County will have continued to grow and will be evolving to become an even more attractive, prosperous, resilient, and sustainable place, anchored by Waterford City and Metropolitan area as the Regional Capital, a University and Learning City, and an economic driver for the region. It will be the best City and County in which to live, learn, visit and do business. We will be recognised as the Regional Capital and for:*

- *Our enterprise and inventiveness in the knowledge economy and high-value markets – with a particular focus on biopharmaceuticals, technological innovation, tourism, food and drink, fishing, and primary industries.*
- *The development and growth of our educational capital through our University and its synergies with the broader economy; and,*
- *Our unique built, historic, cultural and natural environment, which will be protected and, where appropriate, enhanced as a key asset in underpinning a high quality of health/wellbeing, life and place.*

Decision makers will have acted confidently and taken the courageous decisions necessary to further develop a robust, resilient and diversified economy.

The Council will have taken a proactive approach towards development that promotes and facilitates appropriate and sustainable development, that nonetheless:

- *Ensures the sustainable use of natural resources.*
- *Enables us to live within the area's environmental capacity.*
- *Enables and enhances our resilience to climate change; and,*
- *Creates a more open, diverse and inclusive society."*

Section 6.9 of Chapter 6: Utilities Infrastructure, Energy and Communication[21] from the CDP sets out the Council's policy on Wind Energy.

The Council recognises there is significant potential to use renewable energy, including onshore and offshore wind, in meeting future energy demands, enhancing energy security and delivering on EU and National renewable energy and carbon emission reduction targets, as well as presenting economic opportunities for various sectors. However, the Council is also aware that the impact of onshore wind energy developments will vary depending on the location of the individual site together with the number of turbines, their layout, size, design and colour.

The CDP recognises the importance of developing renewable energy resources in the interest of delivering the National Climate Change Adaptation Framework, Climate Action Plans and the Climate Action and Low Carbon Development (Amendment) Act, whilst also balancing this against the need to maintain, and where possible improve, environmental quality. **Table 4-4** below lists relevant Renewable Energy Policies contained in the CDP.

[21] Source: WCCCDP-2022-2028-Vol-1-Chapter-6.pdf (waterfordcouncil.ie)

Table 4-4: Renewable Energy Policies

CDP Policy / Objective	Policy Wording	Response to Policy
UTL 13	***Renewable Energy*** *It is the policy of Waterford City and County Council to promote and facilitate a culture of adopting energy efficiency/ renewable energy technologies and energy conservation and seek to reduce dependency on fossil fuels thereby enhancing the environmental, social and economic benefits to Waterford City and County. It must also be recognised that other sources of electricity generation such as natural gas, particularly renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand. This will be achieved by:* • *Supporting the delivery of renewable energy to achieve the targets identified in Table 6.3 of the Development Plan.* • *Facilitating and encouraging, where appropriate, proposals for renewable energy generation, transmission and distribution and ancillary support infrastructure facilities including the necessary infrastructure required for the development of offshore renewable energy developments developed fully in accordance with the Waterford Renewable Energy Strategy, the wind energy designation map (Appendix 2 of the RES), the Waterford Landscape and Seascape Character Assessment undertaken to inform this Development Plan, and the National Wind Energy Guidelines, or any subsequent update/ review of these* • *The Council recognizes and supports the role that the County can play in facilitating the onshore infrastructure required for the construction, operation and maintenance of offshore wind farm developments. This infrastructure includes but is not limited to: construction facilities, storage and lay-down areas, cable landfalls, onshore cable routing to substations, port and harbour infrastructure and coastal operations and maintenance bases, as well as use, reuse or repowering of existing infrastructure where appropriate.* • *The Wind Energy Designation Map and the Landscape and Seascape Character Assessment Map identify different landscape character areas and associated landscape sensitivities. These designations encompass the concept of buffers between areas of sensitivity which vary across the different landscape character types and their different locations. These buffers allow for a gradual change between contrasting landscape sensitivities and associated wind energy designations to be considered, as necessary, when determining any development proposal.* • *Promote and encourage the use of renewable energy, and low carbon resources, namely solar photovoltaic, geothermal, heat pumps, district heating, solar thermal, hydro, tidal power, offshore and onshore wind, biomass as well as micro-generation among business, agriculture, education, health, and other sectors.* • *Promoting, encouraging, ensuring, and facilitating community engagement, participation and implementation of/ in renewable energy projects.* • *Implementing, including in the Council's own activities and in the provision of services/ works, the use and integration of low carbon, renewable energy infrastructure and technologies.* • *Supporting appropriate options for, and provision of, low carbon and renewable energy technologies and facilities, including the development and provision of district heating (and/ or other low carbon heating technologies); anaerobic digestion and the extraction of energy and other resources from sewerage sludge.* • *The preparation and implementation of a Climate Action Plan (including adaptation and mitigation measures) for Waterford.* • *To support in conjunction with other relevant agencies, wind energy initiatives, both onshore and offshore, and wave energy, and onshore grid connections and reinforcements to facilitate offshore renewable energy development when these are undertaken in an environmentally acceptable manner.*	The proposed project will help in the delivery of much needed renewable energy within the county, further reducing dependency on fossil fuels and is in line with the council's objective to support energy generation through renewable sources. According to Table 6.3 (Renewable Energy Targets) of the CDP, the target for onshore renewable energy to 2030 is 211.2MW. However, this target was set based on 2.64% of the Climate Action Plan 2021 national target of 8GW of onshore wind energy. The current Climate Action Plan 2024 outlines a national target of 9GW, which would result in an updated target of 237.6MW for Waterford. The proposed project would generate an output of c. 85.5-108MW towards the county target. It is suggested that the proposed wind farm and associated transmission infrastructure is appropriate in its location due to a number of factors including: • Wind speeds of between 6.5-8.8 m/s at 100 m above ground level • A contiguous large area of over 900 hectares • Available grid capacity in the region, with an existing available grid connection location near Dungarvan • Good national road network near the site • Absence of areas of deep peat – where peat is present it is extremely shallow • The site will achieve appropriate setbacks from properties including dwellings, existing powerlines, and natural watercourses The proposed project has regard to the Landscape and Seascape Character Assessment policies/objectives and has been designed to minimise any potential effects along with proposed mitigation measures. Compliance with various landscape policy is discussed under **Table 4-5** below which refers to assessment carried out within Chapter 13 (Landscape and Visual Impacts) of this EIAR. The proposed 110kV substation and grid connection route (which will form part of a separate application to ABP) is anticipated to further strengthen the local transmission network and could increase the grid connection options for the network to accommodate more renewable energy projects. Community engagement has been undertaken during the design process of the proposed project and included a webinar, newsletter drops and in person events where attendees raised their key concerns in relation to the proposed project. An example of a clear and direct change to the project as a result of public feedback was the movement of the proposed onsite (wind farm) substation. The previous location was raised as a particular concern by local residents, so the team moved it back to increase the distance to dwelling houses, while also reducing the visibility of it. The final iteration of the proposed project as presented in this EIAR has regard to those issues raised. The proposal has had regard to alternatives in terms of strategic site selection, technology types, turbine and overall site layout design and existing infrastructural assets. Please see Chapter 3 (Reasonable Alternatives) of this EIAR. A detailed environmental constraints assessment was carried out to ensure all existing site conditions are accounted for. This involved both a desk-based GIS assessment as well as a site investigation exercise. As a result, the site layout presenting the least possible environmental affects has been derived and chosen as discussed in Chapter 3 of this EIAR.

CDP Policy / Objective	Policy Wording	Response to Policy
	At initial design stage full consideration should be to reasonable alternatives and existing infrastructural assets. In this regard environmental assessments should address reasonable alternatives for the location of new energy developments, and where existing infrastructural assets such as sub-stations, power lines and roads already exist within proposed development areas, then such assets should be considered for sustainable use by the proposed development where the assets have capacity to absorb the new development. *All planning applications for Renewable Energy Projects such as wind farms and solar farms shall be accompanied by a Decommissioning and Restoration Plan (DRP) consistent with the Wind Energy Guidelines 2006 or any update thereof. Issues to be addressed shall include details of proposed restorative measures, the removal of above ground structures and equipment, the restoration of habitats, landscaping and/or reseeding roads etc.*	As stated in Chapter 2 of this EIAR, wind turbines are expected to last 35 years. When the wind turbines reach the end of their useful life, they may be replaced with new machines, subject to planning permission, or the site will be completely decommissioned, with the exception of the electrical substation, site roads, and drainage. The on-site substation and 110kV grid link will not be removed when the wind farm project reaches the end of its useful life since they will be integrated into the national power network. As a result, the substation will remain permanent and will not be removed. A detailed decommissioning plan will be agreed in advance of works taking place with Waterford City and County Council. A decommissioning plan is contained within the CEMP (Appendix 2-8).

Renewable Energy Strategy (RES) and Wind Energy Strategy (WES)

The Waterford Renewable Energy Strategy (2016-2030) which accompanies the Waterford County Development Plan 2011-2017 has been brought forward to the current CDP. The CDP notes that it is an objective of the Council to undertake a review and update of the Waterford Renewable Energy Strategy (2016-2030) during the lifetime of the CDP in order to assist Waterford in achieving its just transition to carbon emission reduction targets to 2030 and 2050.

The Wind Energy Strategy forms part of the RES and an updated wind energy strategy map was prepared for the current CDP in 2022 and formed Appendix 2[22] to the RES which identified different parts of Waterford as:

- Preferred;
- Open to consideration; and
- Exclusion/No Go areas.

The proposed wind farm site is located primarily lands zoned as an 'exclusion/no go area'' on the WES map, with a relatively small portion of the site within lands zoned as 'preferred' for wind energy development (Please refer to **Figure 4-6** below).

The 2022 WES significantly amended the previous wind energy designations on site. Previously, according to the WES associated with the Waterford County Development Plan 2011-2017 (as extended), the entire proposed wind farm site was located within an area zoned 'open to consideration'. The 2022 WES fails to provide clarity on the basis for which these wind energy designation changes have taken place. Please refer to the accompanying Planning Statement submitted with this application which considers the WES changes in detail, particularly in the context of the urgency of climate change and the merits of this site for wind farm development.

[22] Appendix 7 of the CDP. Source: Volume3-Combined-Appendices-Compr.pdf (waterfordcouncil.ie)

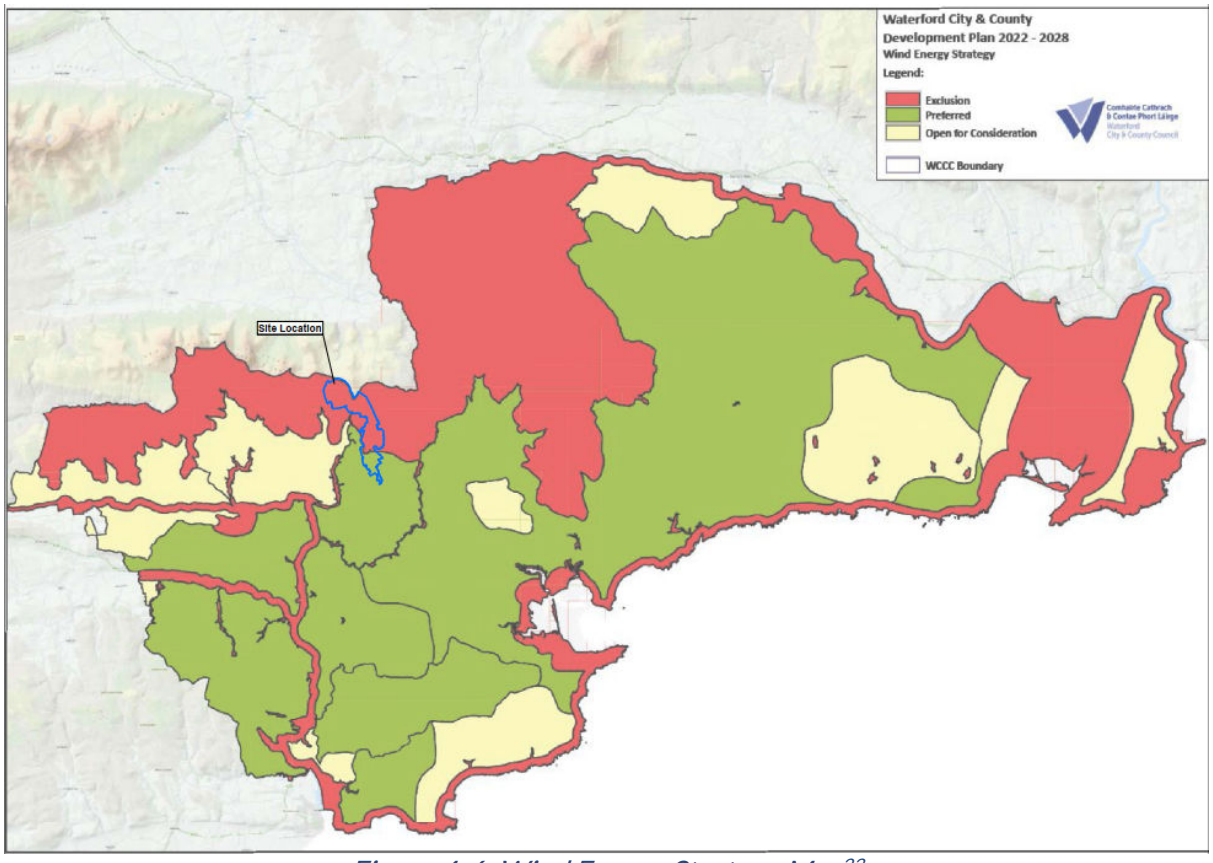

Figure 4-6: Wind Energy Strategy Map[23]

Landscape Character Assessment

Appendix 8[24] of the CDP details policy with respect to Landscape and Seascape Character Assessment, Scenic Routes and Protected Views. It categorises landscapes into a Sensitivity Zoning Key, as per the **Figure 4-7** below.

The proposed wind farm site is located within lands primarily identified as "Most Sensitive," which the current LCA[25] describes as having "very distinctive features with very low capacity to absorb new development without significant alterations of existing character over an extended area." The southern tip of the site is located on lands identified as having ''Low Sensitivity'' which the LCA describes as 'a common character type with a potential to absorb a wide range of new developments''. Chapter 13 (Landscape and Visual Impacts) of this EIAR assesses the potential impacts of the proposed project within the site context and a wider study area, and demonstrates that the landscape character at this location has sufficient capacity to absorb the proposed project without a significant impact on the site and surrounds.

[23] Appendix 2 of Appendix 7 of the Waterford County Development Plan 2022-2028 (CDP).
[24] Appendix 7 of the CDP. Source: Volume3-Combined-Appendices-Compr.pdf (waterfordcouncil.ie)
[25] Appendix 8 of the CDP. Source: Volume3-Combined-Appendices-Compr.pdf (waterfordcouncil.ie)

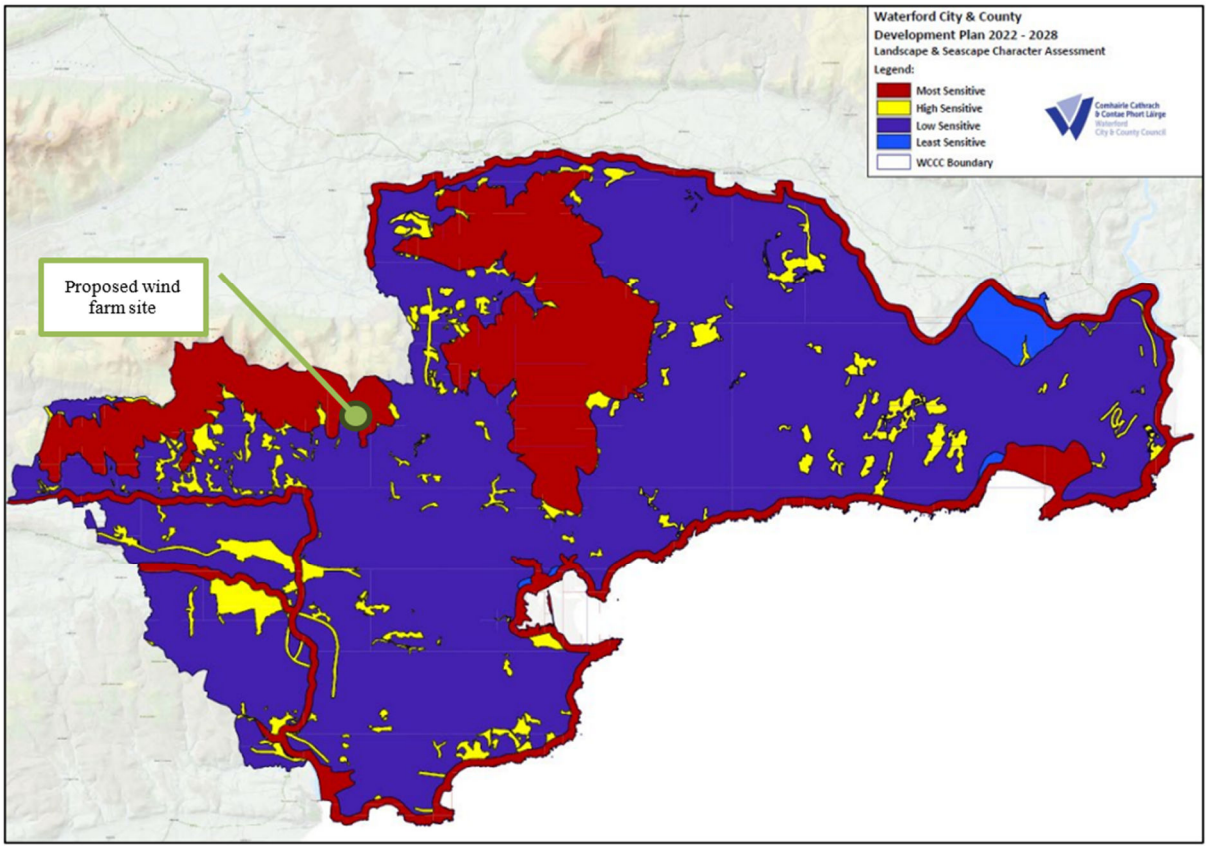

Figure 4-7: Landscape and Seascape Character Assessment Map[26]

Assessment of the Proposed Project against Relevant Policies and Objectives

A number of chapters in the CDP provide a range of policies and objectives aimed at protection of human health, biodiversity, natural and built heritage, air quality and climate. The key policies and objectives which are considered relevant in the context of the proposed project are identified in **Table 4-5** below with a corresponding narrative explaining how each policy and objective has been considered in the design and assessment of the proposed project:

[26] Appendix 8 of the CDP. Source: Volume3-Combined-Appendices-Compr.pdf (waterfordcouncil.ie)

Table 4-5: Other CDP Policies and Objectives Relevant to the Proposed Project

CDP Policy Objectives	Policy Wording	Response to Policy
UTL 14 **Consideration of Human Health**	*Proposals for energy development should demonstrate that human health has been considered, including those relating to the topics of:* • *Noise (including consistency with the World Health Organisation's 2018 Environmental Noise Guidelines for the European Region developments must comply with the Wind Energy Development Guidelines (2006), or any subsequent update/ review of these),* • *Shadow Flicker (for wind turbine developments, including detailed Shadow Flicker Study),* • *Ground Conditions/Geology (including landslide and slope stability risk assessment),* • *Air Quality; and,* • *Water Quality.*	This EIAR considers all potential effects on human health as a result of the proposed project in terms of noise, shadow flicker, ground conditions, air quality and water quality, which are included within the various specialist chapters of this report. The various assessments carried out within those chapters concluded that there are no likely adverse effects as a result of the proposed project on human health.
UTL 19 **Underground Cables**	*Where undergrounding of cables is being pursued, proposals should demonstrate that environmental impacts including the following are minimised:* • *Habitat loss as a result of removal of field boundaries and hedgerows (right of way preparation) followed by topsoil stripping (to ensure machinery does not destroy soil structure and drainage properties).* • *Short to medium term impacts on the landscape where, for example, hedgerows are encountered.* • *Impacts on underground archaeology.* • *Impacts on soil structure and drainage; and* *Impacts on surface waters as a result of sedimentation.*	The proposed grid connection will utilise existing road networks along the vast majority of its length. This ensures that the ecological impact is minimised. There are only localised impacts on trees at one location where it goes off road and this is assessed in Chapter 6 (Biodiversity Flora and Fauna). Containing the proposed works almost entirely within the public road corridor and farm/forest tracks minimises the potential for impacts to soil structure, drainage and sediment runoff (due to the avoidance of machinery disturbing the surface around the works). These areas would also have already been disturbed, so the potential impacts on underground archaeology are also minimised.
UTL 21 **Construction and Environmental Management Plan**	*Construction Environment Management Plans shall be prepared in advance of the construction of relevant projects and implemented throughout. Such plans shall incorporate relevant mitigation measures which have been integrated into the Plan and any lower tier Environmental Impact Statement or Appropriate Assessment. CEMPs typically provide details of intended construction practice for the proposed development, including:* *a) location of the sites and materials compound(s) including area(s) identified for the storage of construction refuse.* *b) location of areas for construction site offices and staff facilities.* *c) details of site security fencing and hoardings.* *d) details of on-site car parking facilities for site workers during the course of construction.* *e) details of the timing and routing of construction traffic to and from the construction site and associated directional signage.* *f) measures to obviate queuing of construction traffic on the adjoining road network.* *g) measures to prevent the spillage or deposit of clay, rubble or other debris.* *h) alternative arrangements to be put in place for pedestrians and vehicles in the case of the closure of any public right of way during the course of site development works.* *i) details of appropriate mitigation measures for noise, dust and vibration, and monitoring of such levels.* *j) containment of all construction-related fuel and oil within specially constructed bunds to ensure that fuel spillages are fully contained (such bunds shall be roofed to exclude rainwater).*	At the commencement of the construction phase, a temporary compound area will be constructed to provide office space, welfare facilities, car parking and hardstands for storing materials. After removal of the compound, the area will be either replanted with forestry (for the southern location) or revegetated with a native seed mixture (for the northern location). Perimeter fencing will be constructed around the substation compound for security and safety purposes. Further information and drawings of the substation and electrical infrastructure. Emergency spill kits with oil boom and absorbent materials will be kept on-site in the event of an accidental spill. Spill kits will be stored in each construction compound, and at the on-site substation in case of emergency. The SHEQ Officer (or equivalent appointed person) will be notified in case of any spills on site. Given the scale of the project, a major consideration for its development is the management of the materials excavated as part of the construction works. Mitigation measures include stepping or battering back of excavations to a safe angle to support the soils during construction. As outlined in Chapter 8 (Soils and Geology) the replacement of natural soil, subsoils, and rock with gravels and concrete for the construction of the infrastructure (temporary and permanent) will result in a change in ground conditions within the proposed project site. Overall, due the relatively low sensitivity of the Land, Soils and Geology conditions locally and the implementation of the mitigation measures, the residual effect is not significant. There will be some temporary dust and exhaust emissions from construction activities during the construction phase.

CDP Policy Objectives	Policy Wording	Response to Policy
	k) disposal of construction/demolition waste and details of how it is proposed to manage excavated soil, including compliance with 'Best Practice Guidelines for the preparation of Resource Management Plans for Construction & Demolition Waste Projects' EPA: 2021, (or any final updates thereof). *l) a water and sediment management plan, providing for means to ensure that surface water runoff is controlled such that no silt or other pollutants enter local watercourses or drains.* *m) details of a water quality monitoring and sampling plan.* *n) if peat is encountered - a peat storage, handling and reinstatement management plan.* *o) measures adopted during construction to prevent the spread of invasive species (such as Japanese Knotweed).* *p) appointment of an ecological clerk of works at site investigation, preparation and construction phases. and* *q) details of appropriate mitigation measures for lighting specifically designed to minimise impacts to biodiversity, including bats.*	The Contractor will have due regard to relevant guidance such as The Control of Dust and Emissions during Construction and Demolition published by the Greater London Authority (GLA) in 2014 and Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes published by the NRA (now TII) in 2011. Potential effects arising from dust and exhaust emissions will be minimised through the implementation of the following best practise measures: • Minimisation of extent of working areas; • Stockpiling of excavated materials will be limited to the volumes required to practically meet the construction schedule; • Drop heights of excavated materials into haulage vehicles will be minimised to a practicable level; • Daily inspections by site personnel to identify potential sources of dust generation along with implementation measures to remove causes where found; • Provision of dust suppression measures (e.g. sweeps/covers/water bowsers) will be used on stockpiles and the road surface during periods of extended dry weather • If necessary, water will be taken from settling ponds in the site's drainage system and will be pumped into a bowser or water spreader to dampen down haul roads and site compounds to prevent the generation of dust; • Silty or oily water will not be used for dust suppression, because this will transfer the pollutants to the haul roads and generate polluted runoff or more dust; • Water bowser movements will be carefully monitored, as the application of too much water may lead to increased runoff; • Traffic coming to site will only use the specified haul routes; • Onsite borrow pits will be used to minimise quantities of stone material being brought to site; • Best practice (including industry recognised dust suppression techniques/equipment) will be used to minimise the potential for dust production during the extraction of rock from the borrow pits and excavations elsewhere; • Vehicles and plant will be routinely serviced to minimise the exhaust emissions during construction; • Vehicles will not be left running unnecessarily and low emission fuels will be used where possible; • A wheel wash will be provided near the main site entrance and used to prevent the transfer of dust from vehicles used during construction works on to public roads - The drawings in Appendix 1-1 of the EIAR include typical details and proposed location of a proposed self-contained wheel-wash system; • A road sweeper will be available if any section of the surrounding public roads becomes soiled by vehicles associated with the proposed project. The proposed project does not involve the closure of any public right of way. However, during the construction phase, there will be temporary closures along the local, regional and national roads. Diversions will be provided, and local access maintained as outlined in the Traffic Management Plan (TMP). Traffic management measures will be implemented in accordance with those included in the Chapter 16 (Traffic and Transportation) of the EIAR and a TMP will be agreed with Waterford County Council.

CDP Policy Objectives	Policy Wording	Response to Policy
		The Contractor undertaking the construction of the works will be obliged to take specific noise abatement measures when deemed necessary to comply with the recommendations of British Standard BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Noise. There will be some temporary dust and exhaust emissions from construction activities during the construction phase. The Contractor will have due regard to relevant guidance such as The Control of Dust and Emissions during Construction and Demolition published by the Greater London Authority (GLA) in 2014 and Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes published by the NRA (now TII) in 2011. Mitigation measures proposed within the NIS will be employed on site at all phases, including measures set out in the BMP to minimise impacts on peat soil and local biodiversity during site preparation/investigation works, and construction phases, which includes the appointment of an Environmental Manager. Please refer to the Construction and Waste Management Plan (CEMP) and a schedule of mitigation measures is prepared and appended to this EIAR for further detail.
UTL 22 **Construction Wastes**	*We will safeguard the environment by seeking to ensure that residual waste is disposed of appropriately. All waste arising during construction will be managed and disposed of in a way that ensures the provisions of the Waste Management Acts and the Southern Waste Management Plan 2015-2021.*	The vast majority of potential waste is expected to be generated at the construction and decommissioning phases of the project. As such, the CEMP report submitted with this application outlines a waste management plan for all phases of the proposed project and relevant mitigation measures to ensure all waste generated from the site is disposed of appropriately. Based on a 2-year construction period and an average of 100 construction staff (Chapter 5, Section 5.4.2.1 references 87-101 staff during peak construction) each year, the maximum municipal waste generated for the proposed project is expected to be in region of 32,250kg. This is a worse-case assessment for the site based on national statistics for the average person. Of this total, according to the national statistics total, 41% will be recycled, 43% thermally treated and 16% send to landfill, equating to the following over the construction period for the proposed project: • 13,223kg recycled, • 13,868kg treated, and • 5,160kg send to landfill. In terms of wastewater generated during construction activities, low volume flush toilets (such as those in commonly used port-a loos) and low volume sink faucets are proposed to significantly reduce the volume of wastewater produced. The proposed project will not generate waste during its operational phase with the exception of very small quantities of office/canteen/welfare waste and small volumes of wastewater generated in the onsite substation compound, which will be removed from site by a licensed waste contractor). Based on a worst-case scenario assessment, the following waste in anticipated to be generated over the operational period for the proposed project: • 397kg recycled, • 416kg treated, and • 155kg send to landfill. Waste management is discussed further in Chapter 11 of this EIAR (Material Assets).

CDP Policy Objectives	Policy Wording	Response to Policy
UTL 23 **Electricity Infrastructure**	*Subject to appropriate environmental assessment and compliance with the policy objectives and development management standards of the development plan, we will support and facilitate the development of a safe, secure and reliable supply of electricity, associated electricity networks and transmission infrastructure to serve existing and future demand.*	A number of grid connection options have been looked into and assessed by TLI, during the design stage of the project, following which one final option for the grid connection route has been selected for approval as part of the proposed project. Chapter 3 (Reasonable Alternatives) outlines a comparison of the potential environmental effects, showing the reasons for the chosen option being favoured relative to the others.
ENV04 **Air and Energy**	*We will contribute towards compliance with air quality legislation; greenhouse gas emission targets; management of noise levels; and reductions in energy usage.*	Section 14.1.4 and 14.1.5 of Chapter 14 (Air Quality and Control) set out the various legislation and guidance the proposed project complies with. The proposed project has been assessed with reference to national guidelines, where available, in addition to international standards and guidelines relating to the assessment of GHG emissions and associated climatic impact from road schemes. Chapter 14 concludes that, *''The assessment of baseline air quality in the region has shown that current levels of key pollutants are significantly lower than their limit values.* *During the construction phase of the project, appropriate mitigation measures will be implemented to minimise any potential adverse effects on air quality and climate. During the operational phase, the proposed project will result in a long-term positive effect on both air quality and climate. The generation of between 262 to 331 GWh per annum of electricity from the proposed project will lead to a net saving in terms of greenhouse gas emissions. The production of this renewable electricity results in the project having a net positive annual effect on GHG emissions of the annual total GHG emissions in Ireland in 2030 in the order of 0.19% to 0.24% of the annual total 2030 GHG Emissions target for Ireland in 2030. The total annual GHG emission savings will amount to between 61,350 tonnes and 77,694 tonnes of CO2eq which is equivalent to 2.05% to 2.59% of the energy sector budget in 2030.''*
BD 01 **Natura 2000 Sites**	*We will protect and conserve all sites designated or proposed for designation as sites of nature conservation value (Natura 2000 Network, Ramsar Sites, NHAs, pNHAs, Sites of Local Biodiversity Interest, Geological Heritage Sites, TPOs) and protect ecological corridors and networks that connect areas of high conservation value such as woodlands, hedgerows, earth banks and wetlands. We will contribute towards the protection and enhancement of biodiversity and ecological connectivity, including woodlands, trees, hedgerows, semi-natural grasslands, rivers, streams, natural springs, wetlands, the coastline, geological and geo-morphological systems, other landscape features, natural lighting conditions, and associated wildlife where these form part of the ecological network and/or may be considered as ecological corridors or stepping stones in the context of Article 10 of the Habitats Directive.*	An AA Screening and NIS has been prepared and submitted with this application. Additionally, a biodiversity and separate ornithology chapter has also been prepared for this EIAR to assess all impacts on biodiversity within and in the vicinity of the site. The NIS submitted with this application concludes that, *''In absence of mitigation, the potential risks to the Blackwater River (Cork/Waterford) SAC, the Blackwater Estuary SPA and the Dungarvan Harbour SPA is the potential reduction in water quality and barrier to commuting otter. However, following the application of the detailed mitigation measures, potential adverse effects will be avoided, and it can be determined that there will be no risk of adverse effects on the qualifying interest habitats and species, or on overall site integrity in light of the conservation objectives for the Blackwater River (Cork/Waterford) SAC, the Blackwater Estuary SPA and the Dungarvan Harbour SPA.* *There will be no adverse effects on the integrity of any European sites during development and operation of the proposed project, either alone or in-combination with any other plans or projects.''*
BD 03 **Compliance**	*All proposed development will be considered in terms of compliance with the standards and legal requirements of the following where they apply;*	The AA and NIS accompanying this application are prepared following all relevant guidance and legislation as set out in Section 1.4 of the NIS.

CDP Policy Objectives	Policy Wording	Response to Policy
with Standards and Legislation	• *Appropriate Assessment of Plans and Projects in Ireland-Guidance for Planning Authorities Department of Housing, Local Government and Heritage (2021).* • *NRA Guidelines on Ecological Impact Assessment (2009)* • *All-Ireland Pollinator Plan (2021)* • *Planning for Watercourses in the Urban Environment (2020)* • *Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites.*	The various other technical chapters relating to soils, hydrology, traffic, noise, biodiversity, etc, all assess the proposed project to comply with the best practice guidance and legislation.
BD 07 **Biodiversity**	*We will protect plant and animal species and habitats which have been identified by the EU Habitats Directive (1997), EU Bird Directive (1979), Wildlife Act (1976) and Wildlife (Amendment) Act 2000 and the Flora Protection Order (2015) and ensure development does not impact adversely on wildlife species or the integrity and habitat value of the site.*	Ecological surveys have been conducted to identify habitat and flora, Annex 1 habitats, fauna, otter, birds, invertebrates, fish and aquatic ecology. Assessments have been made to identify potential impacts at various stages of the proposed project. Relevant mitigation measures have also been proposed to minimise any adverse impacts that arise as a result of the project activities. Table 6-1, 6-2 and 6-3 of the NIS sets out a detailed assessment of potential adverse impacts on the Blackwater River (Cork/Waterford) SAC, Blackwater Estuary SPA, and the Dungarvan Harbour SPA. Various mitigation measures relating to surface water quality management, air quality, and IAPS management have been proposed for the construction stage of the project. Mitigation measures have also been proposed to further minimise impacts during the operational and decommissioning phases of the project. Please refer to Section 6.2 of the NIS for a detailed list of proposed mitigation measures.
BD 08 **Conservation Objectives**	*We will assess all proposed developments at each level of the Development Planning process from City & County Development Plan, Local Area Plan to project level to determine potential for significant effects on the conservation objectives and /or adverse impact on the integrity of the Natura 2000 network and ensure that the requirements of Articles 6(3) and 6(4) of the Habitats Directive are fully satisfied.*	The NIS accompanying this application assesses the various conservation objectives associated with the Blackwater River (Cork/Waterford) SAC, Blackwater Estuary SPA, and the Dungarvan Harbour SPA. The assessments determined that the proposed project has potential to result in indirect impacts due to water quality impacts during various stages of the project. However, various mitigation measures have been prescribed within the NIS which will avoid or reduce potential significant adverse impacts. Consequently, it is determined that there will be no risk of significant adverse effects on the qualifying interests habitats and species, or on overall site integrity, nor in the attainment of the specific conservation objectives for the Blackwater River (Cork/Waterford) SAC, the Blackwater Estuary SPA and the Dungarvan Harbour SPA.
BD 09 **Ecological Impact Assessment**	*We will ensure a sufficient level of information is provided in development applications to enable a fully informed assessment of impacts on biodiversity to be made. Ecological impact assessments submitted in support of development proposals shall be carried out by appropriately qualified professionals and ecological survey work carried out at optimal survey time to ensure accurate collation of ecological data.*	A detailed ecological impact assessment has been carried out as part of Chapter 6 (Biodiversity Flora and Fauna) which includes a review of key ecological receptors, determining their importance, and impact assessment. The chapter also reviews the baseline ecological conditions within a specific study area and outlines proposed mitigation, enhancement and monitoring measures to ensure no significant effects on biodiversity occur as a result of the proposed project. The chapter concludes that,

CDP Policy Objectives	Policy Wording	Response to Policy
		"Following the implementation of the proposed mitigation and monitoring measures associated with the construction, operation and decommissioning phases it is anticipated that the proposed project, will not result in significant residual effects on biodiversity, at any geographical scale, with the exception of the permanent loss of wet [4010] and dry [4030] heath. It was concluded that the loss of these habitats will result in significant residual effect at a County Level. Therefore, appropriate habitat compensation and enhancement measures will be implemented as outlined in Section 6.12 of this Chapter and is further detailed in the BMP in Appendix 2-1 of the EIAR."
BD 13 **Noise and Lighting**	*We will prevent unnecessary noise and light disturbance to wildlife habitats and species by requesting Noise Impact Assessments and Lighting Plans to support development proposals so that wildlife friendly lighting specifications and avoidance of unnecessary noise are incorporated in early design stage of development schemes.*	During the construction phase, as set out in Section 5.1.4 of the NIS, , *"The proposed construction works will result in an increase in noise levels during the construction phase, as well as an increase in personnel and traffic movement to and from the proposed project site. It is proposed to use rock breaking and rock blasting to extract materials from the borrow pits.* *It is likely that temporary construction lighting will be required during the construction works. Fugitive lighting could deter movement of species in the area. A temporary increase in noise levels, disturbance and lighting within the proposed project site may result in disturbance to wildlife within the immediate vicinity of the site."* No construction lighting will be directed towards watercourses within the site, in order to maintain a dark corridor for commuting and foraging Otter. Any temporary construction lighting used during the construction works will be cowled away from potential foraging sites to prevent disturbance to Badger within the area. At operational stage, new lighting will be installed at the proposed substation site and will result in a localised increase in artificial lighting within the immediate surrounding area.
BD 19 **Peatlands**	*We will support the implementation of any relevant recommendations contained in the National Peatlands Strategy 2015. Developments sited on peatlands have the potential to increase overall carbon losses, potentially undermining expected carbon savings (in the case of renewable energy developments) and damaging rare habitats of European importance. It is recommended that when developing project proposals for developments on peatlands assessments are undertaken that consider:* • *Peatland stability;* • *Carbon emissions balance; and* • *Hydrology and Ecology.*	Chapter 6 (Biodiversity Flora and Fauna) which forms part of this EIAR, considers the recommendations of the National Peatlands Strategy. It has been identified that there are opportunities within the project to accommodation recommendations by managing livestock and burning activities. Additionally, a Biodiversity Management Plan (BMP) accompanies this application which outlines habitat heathland (peat soil) restoration measures to be implemented in areas of habitat which have been impacted by the proposed project. According to the BMP, *"The restoration of disturbed habitat will be focused on Knocknanask turbines (1-5) and its related infrastructure which will mainly impact on Wet Heath and small pockets of Dry Heath. On Knocknasheega the restoration works will focus on a small area of Dry Heath between turbines 7 and 8."*
BD 23 **Trees**	*Where development proposals require felling of mature trees a comprehensive tree survey carried out by a suitably qualified arborist shall be submitted assessing the condition, ecological and amenity value of the treestock proposed for removal and mitigation planting and management scheme. We will seek in all cases to ensure when undertaking development or when permitting development that the loss of or damage to existing trees is minimised.*	Any proposed felling of mature trees in order to facilitate the project during the construction of the proposed project will be carried out in accordance with proposed mitigation measures set out in Section 6.8.1.3.5 of Chapter 6 Biodiversity within this EIAR, as follows: • The area to be felled will be determined and demarcated prior to the works commencing.

CDP Policy Objectives	Policy Wording	Response to Policy
		• If trees are to be felled within the bird nesting season, it is recommended that trees are first surveyed for the presence of bird nests. Where a nest is found, and if feasible, the tree will be cornered off until the chicks have fledged or until nesting has failed.
L 03 **Landscape and Seascape Character Assessment**	*We will assess all proposals for development outside of our settlements in terms of the 2020 Landscape and Seascape Character Assessment (Appendix 8) and the associated sensitivity of the particular location. We will require a Landscape and Visual Impact Assessment (LVIA) for proposed developments with the potential to impact on significant landscape features within the City and County. Proposals for significant development (e.g. renewable energy projects, telecommunications and other infrastructure and the extractive industry) shall be accompanied by a LVIA which includes Zones of Theoretical Visibility (ZTV) which indicate the landscape impact zone within which the proposed development may be seen. There will be a presumption against developments which are located on elevated and exposed sites and where the landscape cannot accommodate such development with reasonable and appropriate mitigation.*	A landscape and visual impact assessment including ZTVs has been undertaken as part of this planning application. The assessment concluded that, *''In terms of the residual visual effect, the proposed project operational effects will generate some localised close to significant visual effects, however, these are not considered to reach the significant threshold. Whilst the proposed project will present with a dominant visual presence from some of the nearest receptors, the design of the proposed array directly responds to the guidance for 'transitional marginal' landscape types in the current WEDGs (2006), which aids the development in assimilating into this transitional foothill landscape context.* *Based on the assessment herein, it is considered that the proposed project is of a notable scale but appropriately sited in a broad-scale transitional foothill landscape context and will not give rise to any significant residual landscape effects or visual effects. ''* The assessment also recommends that, *''...the site and its immediate surroundings represent a landscape area that should not be excluded from potential wind energy development based on landscape and visual constraints. Indeed, the intrinsic character of this landscape is that of a gradual transition from productive rolling foothills of forestry and low intensity agriculture into a more open and extensive mountain moorland setting. In the context of the Wind Energy Development Guidelines (2006/2019 revised draft) the subject landscape would fall principally into the category of the 'Transitional Marginal' Landscape Type, which is described as a "landscape type that bridges the organised and intensively managed farmland and the more naturalistic moorland". In this regard, it is no different to foothills landscapes throughout the country, which are the very landscapes that have become synonymous with wind energy development over the past three decades and for a number of pragmatic reasons. The inherent robustness for wind energy development in this type of foothills landscape relates to its intrinsic qualities as well as the favourable wind speeds afforded. This is clearly evident in the western foothills of the Knockmealdown Mountains, where the existing Barranafaddock Wind Farm development is located in an almost identical foothill context to the proposed wind farm. Landscape characteristics in foothill contexts include broad scale landform and land use patterns that can accommodate the height and extent of wind energy developments without a sense of them being over-scaled or overbearing. ''*
L 04 **Scenic Routes and Protected Views**	*We will protect the scenic routes and specified protected views identified in our Landscape Character Assessment (Appendix 8), including views to and from the sea, rivers, landscape features, mountains, landmark structures and urban settlements from inappropriate development that by virtue of design, scale, character or cumulative impact would block or detract from such views.*	The Landscape and Visual Impacts Assessment (LVIA) conducted part of this application assesses all relevant scenic routes and protected views that the proposed turbines might have a visual impact on. As a result, a number of scenic routes and views within Waterford that have been identified to be potentially impacted as assessed under various viewpoints. The LVIA determines that

CDP Policy Objectives	Policy Wording	Response to Policy
		''In summary, the wider study area is richly varied, comprising an array of susceptible landscape areas and features. Nonetheless, the predominance of the wider study area is that of a robust settled rural landscape that is cloaked in a 'low' landscape sensitivity classification. On balance of the reasons outlined above, it is considered that the study area has an overriding Medium landscape sensitivity, although areas of 'High' and even 'Very High' landscape sensitivity are also situated within the study area and relate to the most elevated uplands, the coastline and enclosed river valleys.''
G 01 **Geological Heritage Sites**	*We will contribute towards the appropriate protection and maintenance of the character, integrity and conservation value of features or areas of geological interest. We will protect from inappropriate development the scheduled list of Geological Heritage Sites detailed in Appendix 11.*	Chapter 8 (Land Soils and Geology) of this EIAR finds that in proximity to the proposed wind farm site, *''One geological heritage site is recorded 3 km to the west of the nearest proposed turbine. This is the Knockmealdown gullies, a river channel within extensive gullies. A site report of the Knockmealdown gullies is available through the GSI website27. The geological system comprises Holocene age (post-Ice Age) river channels and sandstones of the Knockmealdown Sandstone Formation. No additional geological heritage sites have been identified within the study area.''* And in proximity to the proposed Grid Connection Route (GCR) and TDR, *''There are no Geological heritage sites within 200m of the proposed GCR. A number of geological heritage sites are located to the south of the proposed GCR. The nearest geological site (Ballynamuck Boreholes) is located 0.4 km to the south of the existing Killadangan Substation. There are no Geological heritage sites within 200m of the proposed TDR.''* In terms of potential impacts to the nearby geological heritage sites, Chapter 8 finds that 'no direct or indirect impacts' were identified as a result of the proposed project.

[27] GSI Geological Site Report of the Bellacorick River - https://secure.dccae.gov.ie/GSI_DOWNLOAD/Geoheritage/Reports/MO011_Bellacorick.pdf (Accessed June 2021)

Development Management Standards for Renewable Energy Development

According to the CDP's Development Management Standards for Renewable Energy Development (DM 31), the following will be critical considerations for wind farm development:

- The Waterford Landscape and Seascape Character Assessment.
- Visual impact particularly on raised/elevated sites.
- Archaeological Impact Assessment and Heritage Impact Assessment.
- Zone of visual influence, and visual impact of the structures.
- Construction impacts, including road access and impact on road network serving the site during the construction phase (A pre and post construction impact report may be required).
- Incorporation of security measures – use of CCTV/surveillance cameras and security fencing, fencing proposals should be appropriate for wildlife through-access.
- The suitability/strength of the grid and accessibility to it.
- The suitability of the site, having regard to other land use policies, including the need to protect areas of important built and natural heritage.
- Impact on drainage patterns and water tables.
- Incorporation of green infrastructure elements and opportunities provided to enhance/ improve biodiversity and biodiversity linkages.
- Decommissioning of obsolete infrastructure and after-use.

The location of the development being within easy access to the electrical grid and having suitable windspeeds, have been important factors in determining the suitability of the site to accommodate a wind farm. The proposed project is located in an area having access to the electrical grid with 110kV lines and also the 110kV substation in Dungarvan nearby. The site is also recorded to have high suitable wind speeds due to its location in an uphill area. The proposed GCR which forms part of the proposed project connects to the existing 110kV substation in Dungarvan.

The proposed project has been designed in line with wind energy guidelines[28] following appropriate setbacks from dwellings (i.e., exceeding 4 times tip as per 2019 Draft Wind Energy Guidelines 2019), while also ensuring effects from noise and shadow flicker are within the relevant standards prescribed within the Draft Wind Energy Guidelines 2019. Additionally, the LVIA conducted for the proposed project concludes it is not considered that any significant visual effect will occur in respect of the identified scenic routes and viewpoints. All of these factors demonstrate the suitability of the site for wind development as there are no anticipated significant adverse effects on local amenities.

[28] Wind Energy Guidelines 2006 and the Draft Wind Energy Guidelines 2019.

Tipperary County Development Plan 2022-2028

Since the proposed wind farm site is located on the border of County Tipperary, the Tipperary County Development Plan (CDP) has been reviewed to consider compliance against policy relating to landscape and visual impacts, cumulative effects, biodiversity, water quality, noise and lighting.

According to the CDP's Landscape Character Assessment (LCA), the proposed wind farm site is adjacent to lands classified as 'the uplands' general landscape area (GLA), which are characterised by mountain landscapes with limited range of uses or types of vegetation and low levels of settlement, services or roads. The LCA also recognises that these areas are increasingly being used for amenities as well as energy and telecoms infrastructure. The 'uplands' GLA is further sub divided into 6 no. Landscape Character Types (LCT), and the proposed wind farm site is located adjacent to the Knockmealdown Mountain Mosaic which forms part of the 'D1 mountain and Upland' LCT.

In terms of landscape sensitivity, the adjacent area north of the site is classified as a Class 5 'vulnerable' area with low capacity to absorb development. There are also guidelines in place to control development in the area with the objective to 'control unavoidable new developments or uses, or the intensification or expansion of established patterns of use and settlement - unless they can demonstrate capacity to sustain existing appearance and character '.

The proposed wind farm site is also located adjacent to areas in County Tipperary categorised as 'primary amenity area' and 'secondary amenity area' along the southern edge of Tipperary. The CDP states that,

> '*these areas are particularly notable by virtue of their scenic and visual quality and offer significant opportunities for tourism development and rural recreational activities. The Council will seek to ensure that a balance is achieved between the protection of sensitive landscapes and the appropriate socio-economic development of these areas. In this respect, development proposals will be required to demonstrate that they integrate and respect the visual quality of the amenity area.*'

Table 4-6: CDP Policies and Objectives Relevant to the Proposed Project

CDP Policy Objectives	Policy Wording	Response to Policy
11 – 16 **Views and Scenic Routes**	*Facilitate new development which integrates and respects the character, sensitivity and value of the landscape in accordance with the designations of the Landscape Character Assessment, and the schedule of Views and Scenic Routes (or any review thereof). Developments which would have a significant adverse material impact on visual amenities will not be supported.*	Chapter 13 (Landscape and Visual Impacts) of this EIAR assesses the visual impacts of the proposed project using 6 no. categories of viewshed reference points (VRP) including designated scenic routes and views within the applied Zone of Theoretical Visibility (ZTV) spanning 20km from the proposed wind farm site. Section 13.7 of Chapter 13 assesses visual effects of the proposed project on designated views and scenic routes within the ZTV, at construction, operational and decommissioning stages. 16 out of the 37 assessed viewshed reference points were selected to represent scenic views and routes within the study area in both counties Waterford and Tipperary. The assessment concluded that, *''the proposed project will generate some notable visual impacts at some of the nearest surrounding scenic route designations that have the potential to generate effects that are close to significant, but are not considered significant in EIA terms. Notwithstanding, the turbines do not appear out of scale or incongruous and will often be viewed offset from or in the opposite direction from the main aspect of visual amenity from surrounding scenic designations."*

11-17 **Amenity Areas**	*Ensure the protection of the visual amenity, landscape quality and character of designated 'Primary' and 'Secondary' amenity areas. Developments which would have a significant adverse material impact on the visual amenities of the area will not be supported. New development shall have regard to the following:* *a) Developments should avoid visually prominent locations and be designed to use existing topography to minimise adverse visual impact on the character of primary and secondary amenity areas.* *b) Buildings and structures shall integrate with the landscape through careful use of scale, form and finishes.* *Existing landscape features, including trees, hedgerows and distinctive boundary treatment shall be protected and integrated into the design proposal*	*The LVIA conducted for the proposed project as part of Chapter 13 of this EIAR, has regard to the landscape zoning designations within Co. Tipperary. The LVIA found that, the proposed wind farm site is located immediately south of lands that transitions from a 'Primary Amenity Area' to an adjoining 'Secondary Amenity Area' (to the east), which reflects the foothill context of the surrounding landscape. These foothill contexts provide a more robust setting for wind energy developments as they are typically influenced by working rural land uses such as forestry and pastoral farmland.* *The proposed project does not provide any renewable energy infrastructure within the primary or secondary amenity areas in County Tipperary, and thus, there will be no direct physical impacts on the landscape within these designations.* *The central study area conclusion within the LVIA states that,* *''Whilst there are some localised areas that would be considered of 'high' sensitivity in the central study area, such as the more elevated uplands and enclosed river valleys, the majority of the central study area presents with robust working rural landscape values. On balance of the reasons outline above, the landscape sensitivity of the central study area is deemed to be* ***Medium****, with localised areas of higher sensitivity.''*

11-1 **Cumulative Impacts**	*In assessing proposals for new development to balance the need for new development with the protection and enhancement of the natural environment and human health. In line with the provisions of Article 6(3) and Article 6 (4) of the Habitats Directive, no plans, programmes, etc. or projects giving rise to significant cumulative, direct, indirect or secondary impacts on European sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this Plan (either individually or in combination with other plans, programmes, etc. or projects[29]).*	This planning application is supported by an NIS following an AA Screening. Plans and projects within of the ZoI of the proposed project were reviewed for potential to act in-combination with the proposed project. The EIA portal and Waterford County Council Planning Portal was accessed to examine planning applications with potential to act in – combination with the proposed project. It was found that 'there is no potential for in combination effects with the proposed project under appraisal.'
11-2 **NIS**	*Ensure the protection, integrity and conservation of European Sites and Annex I and II species listed in EU Directives. Where it is determined that a development may individually, or cumulatively, impact on the integrity of European sites, the Council will require planning applications to be accompanied by a NIS in accordance with the Habitats Directive and transposing Regulations, 'Appropriate Assessment of Plans and Projects, Guidelines for Planning Authorities', (DEHLG 2009) or any amendment thereof and relevant Environmental Protection Agency (EPA) and European Commission guidance documents.*	

[29] Except as provided for in Article 6(4) of the Habitats Directive, viz. There must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the project to proceed; and c) Adequate compensatory measures in place.

11-5 **Ground Water**	*Ensure that new developments proposed in or near 'Ground Water Protection Schemes' and 'Zones of Contribution' which contribute to public water supplies, do not result in a significant negative impact on the integrity, function and management of these important assets.*	There will be no significant negative effect on the integrity, function and management of 'Ground Water Protection Schemes' and 'Zones of Contribution' which contribute to public water supplies.
11-7 **Rivers**	*a) Ensure the protection of water quality in accordance with the EU WFD, and support the objectives and facilitate the implementation of the associated Programme of Measures of the River Basin Management Plan 2018-2021 and any successor. This includes contributing towards the protection of Blue-Dot catchments and drinking water resources. Also, have cognisance of the EU's Common Implementation Strategy Guidance Document No. 20 and 36 which provide guidance on exemptions to the environmental objectives of the WFD.* *b) Support an integrated and collaborative approach to catchment management in accordance with the River Basin Management Plan 2018-2021 and any successor.* *c) Require an undisturbed edge or buffer zone to be maintained, where appropriate, between new developments and riparian zones of water bodies to maintain the natural function of existing ecosystems associated with water courses and their riparian zones, and to enable sustainable public access.*	WFD compliance assessment was undertaken in relation to the proposed Project. Mitigation measures in relation to the protection of water quality are outlined in Chapter 9. Taking into consideration the impacts of the proposed wind farm on the biological, physico-chemical and hydromophological quality elements, it is concluded that, following the implementation of design and mitigation measures, it will not compromise progress towards achieving GES or cause a deterioration of the overall status of the water bodies that are in scope; it will not compromise the qualifying features of protected areas and is compliant with other relevant Directives. The proposed project will work with the planning authority in relation to an integrated/collaborative approach to achieving the WFD goals. There are no proposed works in the riparian zone in Tipperary Co Co. However, Measures to protect surface water and groundwater quality are detailed in Chapter 9.

		The footprint of the proposed infrastructure avoids watercourses and riparian zones as much as possible. Where watercourse crossings are required at the three single span bridge locations and four directional drilling locations for the grid connection, the design minimises disturbance to the riparian habitats. There are no instream works proposed for any natural watercourse. The use of mitigation, including suitable approved silt fences as well as the suspension of works near watercourses in periods of intense rainfall, will maintain the natural function of the aquatic ecosystems within the proposed project and will minimise the potential for downstream effects. A minimum of 20m of riparian vegetation will be maintained between the silt fence and the relevant stream or river and 10m for drainage ditches. All mitigation measures will be closely monitored for the duration of the project by an appointed Environmental Manager.
11 – 18 **<u>Noise</u>**	*Ensure that new development does not result in significant noise disturbance and to ensure that all new developments are designed and constructed to minimise noise disturbance in accordance with the provisions of the Noise Action Plan 2018 and relevant standards and guidance that refer to noise management.*	The predicted noise levels associated with the proposed project will be within best practice noise limits recommended in Irish guidance regardless of which turbine is constructed within the turbine range, therefore it is not considered that a significant effect is associated with the proposed project. Noise from the proposed substation, grid route and other ancillary works has also been assessed and found to be well within the proposed noise criteria.
11 - 19 **Lighting**	*Ensure that new development does not result in significant disturbance as a result of light pollution and to ensure that all new developments are designed and constructed to minimise the impact of light pollution on the visual, environmental and residential amenities of surrounding areas.*	There is no significant lighting proposed as part of the project and thus, there are no anticipated significant disturbances in terms of light pollution at the operational stage of the proposed project. During construction there will be localised lighting during winter evenings in particular, however these will be isolated to the locations where works are being undertaken at that time and are not anticipated to be significant.

Kilkenny City and County Development Plan 2021-2027

Since the temporary works associated with the proposed TDR are located with County Kilkenny, the Kilkenny City and County Development Plan (CDP) has been reviewed to assess compliance against policy relating to the proposed road works.

The proposed TDR works include temporary local road improvements to two roundabouts on the national road network within County Kilkenny to allow delivery of the turbine components. These works include hard standing areas and temporary removal of existing road signage Slieverue and Luffany roundabouts.

There are no specific policies which relate to proposed works on public roads within the CDP. However, CDP sets out the following strategic development management requirements in relation to proposed road works:

Table 4-7: CDP Policies and Objectives Relevant to the Proposed Project

CDP Policy Objectives	Description	Response to Policy
Development management requirements	• *To ensure that future development affecting national primary or secondary roads shall be assessed in accordance with the guidance given in Spatial Planning and National Roads - Guidelines for Planning Authorities.* • *To ensure that the required standards for sight distances and stopping sight distances are in compliance as far as possible, with current road geometry standards as outlined in:* ○ *the TII document Design Manual for Roads and Bridges (DMRB) and TII Standard DN-GEO-03060 Geometric Design of Junctions; and* ○ *the Design Manual for Urban Roads and Streets (DMURS) and TII Standard DN-GEO-03084 'The Treatment of Transition Zones to Towns and Villages on National Roads' where appropriate.* ○ *In the case of single houses in the countryside such standards should not be achieved by the extensive removal of hedgerows, ditches, embankments, trees or old walls, and should be in accordance with Section 2.8 of the Rural Design Guide.* ○ *All significant development proposals will be required to have transport and traffic assessments carried out in accordance with the publication Traffic Management Guidelines and the Traffic and Transport Assessment Guidelines (where the development affects a national road).* ○ *Planning applications involving a new access or significant changes to an existing access to a national road, will be required to include a Road Safety Audit.*	Traffic and transportation impact associated with the proposed project has been assessed for the construction phase, operational and decommissioning phases of the proposed project in accordance with the Spatial Planning and National Roads Guidelines for Planning Authorities (2012). The proposed project will potentially impact a combination of national, regional and local roads as outlined in Section 16.2.6 of Chapter 16 (Traffic and Transportation). As such, a Stage 1 Road Safety Audit was carried out on the following locations: • the proposed wind farm site access, • in three public road crossing points where the internal site roads cross local roads (i.e. L1026, L5054, and L5055) and, • along AIL haul route where works will be required (Drawings 11303-2300 to 11303-2323). The audit recommended that adequate temporary signage and traffic management should be provided to inform road users at all locations where existing signs have been temporarily removed, and traffic management should be in place where AILs tyre paths occupy the opposing lane of the road, preventing traffic from undertaking the AILs. RSA recommendations will be implemented. Additionally, a Traffic Management Plan (TMP) has been prepared prior to the appointment of a Contractor, material suppliers and final Construction Phase programme, and attached with Chapter 16 (Traffic and Transportation). It will be

		updated following grant of planning permission and prior to commencement of any construction works.

4.4 CONCLUSION

There are significant International, European, National and Local policy supports for renewable energy technologies in the country. In September 2022,a it was confirmed that Ireland yet again missed its targets for reducing greenhouse gas emissions as per the latest report from the Climate Change Advisory Council – 'Annual Review September 2022'[30] – *"Ireland has failed to meet its 2020 EU target of a 20% reduction in greenhouse gas emissions and will have to use allowances purchased from other Member States to meet the shortfall"*. More recently, the 'Annual Review For All' published in October 2024[31] states that *"planning processes must ensure that new energy infrastructure is developed to withstand future projected climate impacts."*

2050 European targets mean that Europe's energy production will have to be almost carbon-free by that time, and while Ireland has come a long way in recent years to increase renewable energy generation, the targets are ever increasing. It is this commitment on energy and climate policy that justifies a clear need for renewable energy generation in Ireland. It is recognised that there are a range of renewable resources alternatives that could be explored to meet our International and European commitments, however, onshore wind is central pillar of Ireland's decarbonisation strategy in the short medium and long term.

Ireland is fortunate to have access to the lowest cost renewable electricity resources in the world. As a small island nation, the challenges are to deliver a secure supply of energy to meet our growing needs and drive economic prosperity, while making sure cost is to the forefront of decision-making, alongside reducing CO_2 emissions to protect the environment and limit the impact of climate change for future generations.

Ireland is one of the leading countries in its use of wind energy and is in fifth place worldwide based on 2021 usage after Denmark, Uruguay, Spain and Portugal[32]. As mentioned previously the Irish government is ramping up its aspirations on renewables, aiming for 80% renewable electricity by 2030. Wind energy provides a clean, sustainable solution to our energy problems. It can be used as an alternative to fossil fuels in generating electricity, without the direct emission of greenhouse gases.

The benefits of wind power are considered to be many, and these can be summarised as follows:[33]

- Wind energy releases no pollution into the air or water.
- Wind energy is both renewable and sustainable. The wind will never run out, unlike the earth's fossil fuel reserves (such as oil and gas).
- Adding wind power to the energy supply diversifies the national energy portfolio and reduces reliance on imported fuels.
- Wind turbines have a relatively small footprint. Although they can tower high above the ground, the impact on the land is minimal. The area around the base of the wind turbine can often be used for other purposes such as agriculture.
- Wind turbines are considered relatively low maintenance. A new wind turbine can be expected to last some time prior to any maintenance work needing to be carried out.

[30] https://www.climatecouncil.ie/media/climatechangeadvisorycouncil/contentassets/publications/CCAC-ANNUAL-REVIEW-2022.pdf
[31] CCAC-AR-2024-SfA-final.pdf
[32] https://www.ren21.net/wp-content/uploads/2019/05/GSR2022_Full_Report.pdf [Accessed January 2023]
[33] https://www.esb.ie/tns/education-hub/future-energy/wind-energy

- Local and Economic Benefits. As well as attracting investment into Ireland, wind energy is also contributing to our national growth through paying taxes and is predicted to contribute a tax revenue of €1.8 billion by 2030[34]. Ireland saves money (over €1 billion in the last five years) on wind energy from cutting down on expensive fossil fuel imports. Energy in Ireland 2021 Report published by the SEAI has indicated that wind energy accounted for 86% of renewable electricity in Ireland in 2020. In addition, the SEAI reports that the CO2 intensity of electricity generation fell to 296gCO2/KWh in 2020, which is noted as a historic low for Ireland and 39% lower than in 2016 (481 gCO2/KWh).[35]

It is requested that the Planning Authority has regard to the strong international policy and national objectives that support wind energy development in line with International, European, and National binding agreements to increase the use of renewable energy.

The proposed project fits with the overall strategic aim of the Waterford City and County Development Plan by facilitating the development of a diverse energy portfolio by the sustainable harnessing of the potential of renewable energy. Although the proposed wind farm is located within lands zoned for 'exclusion' of wind farm development. This is contrary to international and national policy and legislation as the adopted wind energy strategy within the CDP was prepared before the adoption of Ireland's new legally binding sectoral emissions ceilings which were approved by Government in July 2022. It was also in advance of the publication of the Climate Action Plan (CAP) 2023 and 2024, which includes further increased targets for onshore wind deployment in Ireland, and RED III. Therefore, the strategy does not locate sufficient viable land for wind farm development which is further reduced due to accommodate existing environmental constraints such as dispersed dwellings and settlements across rural areas.

Based on a mapping analysis presented in the Planning Statement attached with this submission it is contended that the 2022 County Development plan is demonstrably less ambitious for onshore wind energy than its predecessor, at a time when national policy is calling for onshore wind capacity to more than double, and European policy is calling for accelerated mass adoption of renewable energy in response to the twin climate and energy cost / energy security crises. A logical response to national and EU policy (even in advance of the publication of our sectoral emissions ceilings and CAP 24 onshore wind targets) would be to increase the viable areas for onshore wind development in Waterford, but at an absolute minimum, it should have preserved pre-existing ambitions evident from the wind designations maps associated with the previous CDP. This did not occur, and the subject site changed from 'Open to Consideration' to 'No go/ Exclusion area'.

It also complies with the RSES, and the Wind Energy Development Guidelines 2006. The proposed project is cognisant of the Draft Revised Wind Energy Development Guidelines (2019) and other policies as described above.

From an environmental point of view, the EIAR's conclusions show that the site is appropriate for the nature and scope of the proposed project.

[34] Wind Energy (esb.ie)
[35] https://www.seai.ie/publications/Energy-in-Ireland-2021_Final.pdf