Planning and Environmental Consultants

Environmental Impact Assessment Report

Briskalagh Renewable Energy Development, Co. Kilkenny

Chapter 2 – Background

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2. BACKGROUND TO THE PROPOSED PROJECT

2.1 Introduction

This chapter of the EIAR presents the policies and targets which have been put in place at the various levels of Government including international, national, regional and local in relation to planning, renewable energy and climate change which are relevant to the Proposed Project. The details below set out the need for the Proposed Project as it seeks to aid Ireland in meeting its national targets and European commitments in relation to climate change and decarbonisation.

It summarises the EIAR Scoping exercise, the Pre-planning and Community Consultation undertaken and the Cumulative Impact Assessment process.

This chapter also provides a summary of the planning policy context relevant to the Proposed Project and should be read in conjunction with the Planning Report which accompanies the planning application.

The Proposed Project, which will be known as the 'Briskalagh Renewable Energy Development', is being brought forward in response to local, regional, national and European policy regarding Ireland's transition to a low-carbon economy, associated climate change policy objectives and to reduce Ireland's dependence on imported fossil fuels for the production of electricity.

As detailed in Section 1.1.1 in Chapter 1, for the purposes of this EIAR, the various project components are described and assessed using the following references: 'Proposed Project', 'Proposed Wind Farm', 'Proposed Grid Connection', 'Site' and 'Proposed Wind Farm site'. Please see Section 1.1.1 of this EIAR for further details. A detailed description of the Proposed Project is provided in Chapter 4 of this EIAR.

2.1.1 Statement of Authority

MKO has developed extensive expertise and experience over the last 15 years in preparing Background and Planning Policy Context Chapters for a range of projects, including multiple large scale wind energy developments.

This chapter was led by Alan Clancy MIPI with support from Mike Amiel Mekell RTPI Licentiate of MKO. Alan Clancy is a Project Planner with MKO with over 9 years of experience in private practice. Alan holds a BA in Geography & History and a Master's in Planning and Sustainable Development. Alan has experience across a range of sectors including commercial, residential and industrial, Alan's key strengths and areas of expertise are in development management, provision of planning advice and project management. Since joining MKO, Alan has assisting with various projects including Strategic Infrastructure Developments, lodgement and management of Planning Applications, Development Plan Submissions and preparing Development Potential Reports. Alan is a member of the Irish Planning Institute.

Mike Amiel Mekell is a Graduate Planner with MKO having joined the company in June 2024. Mike holds a BA (Hons) in Politics, International Relations and Sociology from University College Dubin and an MSc (Hons) in Planning and Development from Queen's University Belfast. He is a Licentiate of the Royal Town Planning Institute. Since joining MKO, Mike has been involved in a range of renewable energy projects including onshore wind, solar and grid infrastructure developments. His main responsibilities include preparing planning application documents and reports, preparing inputs for Environmental Impact Assessment Reports and liaising with multidisciplinary project teams.

This chapter was reviewed by Eoin McCarthy BSc and Meabhann Crowe MRTPI. Eoin McCarthy is a Project Director with MKO, with over 13 years of environmental consultancy experience. Eoin holds a B.Sc. (Hons) in Environmental Science from NUI, Galway. Eoin's key strengths and areas of expertise are in project management, environmental impact assessment, wind energy site selection and feasibility assessment. He has overseen some of the largest wind energy SIDs in Ireland in recent years. In his role

as project manager, Eoin works with and co-ordinates large multidisciplinary teams including members from MKO's Environmental, Planning, Ecological and Ornithological departments as well as sub-contractors from various fields in the preparation and production of EIARs. He has held the role of project manager on over 550MW worth of wind energy projects.

Meabhann Crowe is a Renewables Project Director with MKO with over 15 years private sector experience. She is a fully chartered member of the Royal Town Planning Institute (MRTPI). Meabhann holds a BA (Hons) in Geography, Sociological and Political Science and a Master's in Urban and Regional Planning. Meabhann brings particular expertise in initial development feasibility appraisals and development strategies. Her experience in managing large multi-disciplinary teams in the preparation of local and major planning applications across residential, mixed-use, renewable energy and retail developments means she has a wealth of knowledge to draw on in the early stages of development. She has particular experience in preparing and managing project strategies which include both responding to emerging planning policy whilst also preparing and progressing complex planning applications and appeals.

2.1.2 Renewable Energy Resources

Renewable energy resources are constantly replenished through the cycles of nature, unlike fossil fuels, which are finite resources that are becoming increasingly scarce and expensive to extract. Renewable energy resources offer sustainable alternatives to our dependency on fossil fuels as well as a means of reducing greenhouse gas (GHG) emissions and opportunities to reduce our reliance on imported fuels.

A gradual shift towards increasing our use of renewable energy is no longer viable. There is an urgency now to ensure real changes occur without delay. Renewable energy development is recognised as a vital component of Ireland's strategy to tackle the challenges of combating climate change and ensuring a secure supply of energy. Ireland is heavily dependent on the importation of fossil fuels to meet its energy needs. 70% of energy used in Ireland is imported from abroad, higher than the European Union (EU) average of almost 60% (National Energy Security Framework 2022). This high dependency on energy imports is highly risky and Ireland is currently extremely vulnerable both in terms of meeting future energy needs and ensuring price stability. As such, expanding indigenous renewable energy supply is critical for energy security and price stability. The provision of the Proposed Project would aid in achieving the shift to decarbonising the electricity sector and energy security in Ireland.

2.2 Climate Change Policy and Targets

International and national policy consistently identifies the need to reduce GHG emissions and stresses the importance of reducing global warming. The context of international policy has altered over the last 30-years from being of a warning nature to the current, accepted belief, that there is a climate change emergency occurring both within Ireland and at a broader global scale. The Intergovernmental Panel on Climate Change (IPCC)'s Sixth Assessment Report[1] published in 2021 provides a stark assessment of global climate change and presents evidence that climate changes will increase in all regions of the globe over the coming decades and that much of the damage caused by climate change up to this point is now likely irreversible, such as the rise in sea levels over the 21st century.

"*The Status of Ireland's Climate 2020*" produced by MET Eireann[2], similarly reflects on clear and distinct impacts arising from climate change effects within an Irish context:

<u>Greenhouse gas emissions continue to rise:</u>

- Background carbon dioxide (CO2) concentrations reached 414 ppm in 2020 which is approximately a 50% increase compared to pre-industrial levels.
- Methane (CH4) concentrations are at 1940 ppb - which is approximately a 170% increase compared to pre-industrial levels.

[1] *Climate Change 2021 'The Physical Science Basis' (Intergovernmental Panel on Climate Change, August 2021)*
[2] *Climate Status Report for Ireland 2020 (Environmental Protection Agency, Marine Institute, Met Éireann, August 2021)*

- Nitrous oxide (N2O) concentrations are now above 330 ppb - which is approximately a 20% increase compared to pre-industrial levels.

Annual average amounts of precipitation are increasing:

- Annual precipitation was 6% higher in the period 1989 to 2018, compared to the 30-year period 1961 to 1990. The decade 2006 to 2015 was the wettest on record.

Annual average air temperature is rising:

- The annual average surface air temperature in Ireland has increased by approximately 0.9°C over the last 120 years, with a rise in temperatures being observed in all seasons.
- An increase in the number of warm spell days the last 60 years with very little change in cold spell duration;

Sea level continues to rise:

- Satellite observations indicate that the sea level around Ireland has risen by approximately 2-3mm/year since the early 1990s. Analysis of sea level data from Dublin Bay suggests a rise of approximately 1.7mm/year since 1938 which is consistent with global average rates.

The ocean is becoming more acidic:

- Measurements in the surface waters to the west of Ireland between 1991 and 2013 indicate an increase in ocean acidity which threatens calcifying species such as corals, shellfish and crustaceans.

The ocean is getting warmer:

- The average sea surface temperature at Malin Head over the 10 years between 2009 and 2018 was 0.47°C above the 1981-2010 mean.

There is an increase in river flows across most of the country:

- However, there is evidence in recent years of an increase in potential drought conditions especially in the east.

The area of forests and artificial surfaces has increased:

- Land cover observations since 1990 show increases in the area covered by both artificial surfaces and forests and a decrease in wetland areas which include peatlands. There was an increase of 38% in the volume of trees between 2006 and 2017.

The IPCC's Sixth Assessment Report does not, however, conclude that a climate catastrophe is inevitable, but rather, there remains a 'narrow path' to determine the future course of climate, mainly by cutting emissions down to net zero. The Proposed Project will contribute to the decarbonisation of the energy sector and reduce harmful emissions. In this regard, it is compliant with national and international climate change policy and targets.

2.2.1 International Climate Change Policy

United Nations Framework Convention on Climate Change

In 1992, countries joined 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 impacts 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 GHGs. The framework set no binding limits on GHG emissions for individual countries and contains no enforcement mechanisms. Instead, the framework outlines how specific international treaties (called "protocols" or "Agreements") may be negotiated to set binding limits on GHGs.

Kyoto Protocol

The Kyoto Protocol operationalises the UNFCCC by committing industrialised countries and economies in transition to limit and reduce GHG emissions in accordance with agreed individual targets. Ireland is a Party to the Kyoto Protocol, which came into effect in 2005, and as a result of which, emission reduction targets agreed by developed countries are now binding.

In Doha, Qatar, on 8th December 2012, the *"Doha Amendment to the Kyoto Protocol"* was adopted. The amendment includes:

- New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from 1st January 2013 to 31st December 2020;
- A revised list of GHGs to be reported on by Parties in the second commitment period; and
- Amendments to several articles of the Kyoto Protocol which specifically referenced issues pertaining to the first commitment period and which needed to be updated for the second commitment period.

Under the protocol, countries must meet their targets primarily through national measures, although market-based mechanisms (such as international emissions trading) can also be utilised.

COP21 Paris Agreement

COP21 was the 21st session of the Conference of the Parties (COP) to the UNFCCC. Every year since 1995 (excluding 2020 due to COVID-19), the COP has gathered the 196 Parties (195 countries and the EU) that have ratified the Convention in a different country, to evaluate its implementation and negotiate new commitments. COP21 was organised by the United Nations (UN) in Paris and held from 30th November to 12th December 2015. COP21 closed with the adoption of the first international climate agreement (concluded by 195 countries and applicable to all). The 12-page text, made up of a preamble and 29 articles, provides for a limitation of the global average temperature rise to well below 2°C above pre-industrial levels and **to limit the increase to 1.5°C**. It is flexible and takes into account the needs and capacities of each country. The IPCC's 6th Assessment Report (2021) further collaborates this need to limit any increase in global average temperature to 1.5°C, stating that (underlined for emphasis),

> *"Humanity has emitted 2,560 billion equivalent tons of CO_2 since 1750, and we only have a budget of 500 more if we want to limit warming to 1.5°C.*
>
> *By following a trajectory of very low GHG emissions (SSP1-1.9), the threshold of 1.5°C will be reached in the short term, between 2021 and 2040, before being very slightly exceeded (1.6°C anticipated over the period 2041-2060) then respected in the long term (1.4°C anticipated over the period 2081-2100).*
>
> *Everything is not lost, but we must pursue the Paris Agreement's most ambitious goal of limiting warming to 1.5°C."*

An article published by the IPCC on the 6th October 2018 titled '*Global Warming of 1.5°C*', notes the impacts of global warming of 1.5°C above pre-industrial levels and related global GHG 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 UNFCC to adopt the Paris Agreement and provides an update on the impact of climate change if emissions are not reduced.

COP25 Madrid

COP25, the 25th session of the COP, was held between the 2nd and 13th of December 2019 in Madrid. The conference was characterised by repeated warnings from civil society (NGOs and corporates) on emerging evidence and scientific consensus on climate change risk. Specifically, it was noted that there are only c. '*10 years left*' before the opportunity of limiting global warming to 1.5°C is no longer feasible. As such, the only remaining approach to limiting raising global temperatures is a '*7.6% reduction of global GHG emissions every year between 2020 and 2030, and to reach net zero emissions by 2050*'. However, consensus was not achieved between States on finalising the operating rules of the Paris Agreement and to ensure that it became operational by 2020. Three issues which emerged between States from the COP25 are summarised below:

- There was no uniform consensus between States to raise countries' climate ambitions, e.g. to make increased commitments in light of growing climate change data. Some States were opposed to imposing any obligation on countries to submit enhanced pledges next year, arguing it should be each country's own decision. All states were required to submit a review of their commitments for COP26 in 2020. At the current level of climate targets, within a decade, the objective of the Paris Agreement will no longer be achievable;
- There was no agreement on finalising Article 6, the foundations for international cooperation to combat climate change. The aim was to establish the rules for new international mechanisms for financing and transferring GHG emission reductions; and
- There was no agreement on financing (Green Climate Fund); specifically, relating to both loss and damage caused by climate change.

Despite the lack of consensus on the above challenges, the COP25 did achieve more limited success with regard to the introduction of the "*San Jose Principles for High Ambition and Integrity of International Carbon Markets*", which sets out the framework on which a robust carbon market should be built. These principles include, but are not limited to:

- Ensures environmental integrity and enables the highest possible mitigation ambition;
- Delivers an overall mitigation in global emissions, moving beyond zero-sum offsetting approaches to help accelerate the reduction of global GHG emissions;
- Prohibits the use of pre-2020 units, Kyoto units and allowances, and any underlying reductions toward Paris Agreement and other international goals; and
- Ensures that double counting is avoided and that all use of markets toward international climate goals is subject to corresponding adjustments.

These principles received backing from 23 EU nations, including Ireland, as well as countries in Latin America, 5 Pacific islands, and 2 Caribbean nations.

COP26 Glasgow

COP26 took place in Glasgow, Scotland between the 31st October and 12th November 2021. The summit was centred around the fact that "*climate change is the greatest risk facing us all.*" The UK, as hosts for the summit, have developed a ten-point plan to deliver a green industrial revolution, seeking to lead the world in tackling and adapting to climate change.

The key items COP26 seeks to achieve are:

- Secure global net zero by mid-century and keep 1.5 degrees within reach
- Adapt to protect communities and natural habitats
- Mobilise finance
- Work together to deliver

All world leaders at the summit confirmed the need to urgently address the gaps in ambition and work together to achieve climate action.

The summit highlighted that the Paris Agreement is working, with leaders outlining national targets and efforts to further reduce emissions. There was a clear commitment to working together to achieve climate aims, with significant announcements including:

- *"Over 40 leaders joined the Breakthrough Agenda, a 10-year plan to work together to create green jobs and growth globally, making clean technologies and solutions the most affordable, accessible and attractive option before 2030 – beginning with power, road transport, steel, hydrogen and agriculture.*
- *Over 120 countries covering more than 90% of the world's forests endorsed the Glasgow Leaders' Declaration on Forests & Land Use committing to work collectively to halt and reverse forest loss and land degradation by 2030, backed by the biggest ever commitment of public funds for forest conservation and a global roadmap to make 75% of forest commodity supply chains sustainable.*
- *A Just Energy Transition Partnership was announced to support South Africa's decarbonisation efforts; a powerful example of collaboration between an emerging economy and international partners.*
  The launch of the Global Methane Pledge saw over 100 countries committing collectively to reduce global methane emissions by 30% by 2030."

COP27 Egypt

COP27 took place in Sharm el-Sheikh from the 6th-20th of November 2022. The COP is a supreme decision-making body of the UNFCCC. COP 27 centred around three major topics:

- Closing the emissions gap to keep 1.5°C alive
- Loss and Damage
- Climate Finance

COP27 officially ended on the 18th of November, but due to the nature of negotiations an outcome text and the final press conference was not held until November 20th. The first outcomes of the negotiations of the COP27 agenda were seen in the first draft document. A consolidated final document followed and while it removed much of the vague wording of the draft, it also removed some critical key points, particularly in relation to the strengthening of actions required by developed nations. The most significant outcomes from COP27 are outlined below:

- **Phase down/out language:** The final agreement was delayed due to the stance of China and India, among others, who were not comfortable with the 'phase out' of coal wording in the draft text. This led to the watering down of this commitment to a 'phase down' of coal use. The hope was that COP27 would work to include further language on coal and fossil fuel reduction efforts. However, the wider commitment to phase out all fossil fuels, led by India, and backed by the US and the EU, was taken out and can be marked as the biggest disappointment of COP27.
- **1.5°C Pathway:** The 1.5°C warming limit has been retained and reassurances have been made that there is no room for backsliding. It gives the key political signals that the phase down of all fossil fuels is happening. There has been the setting of a workplan for 2023 to help articulate the nature and components of a global collective goal on adaptation and resilience and how it can be formatted in a way to take into account the Global Stocktake.
- **Climate Finance & Loss and Damage:** There has been the launch of an initiative by the V20 and G7 known as the Global Shield Against Climate Risk (GSACR). The intention of this initiative has been framed almost as an insurance policy backed by the World Bank to prepare and protect those most vulnerable to climate change disasters. The initiative seeks to reform the current climate finance model currently operating in the form of loans, typically with high interest rates and repayment requirements. The beginnings of a framework to compensate for the unequal distribution of harm that has been caused by climate change and the unequal contributions of emissions has also been put in place.

COP28 United Arab Emirates

COP28 took place in Dubai, United Arab Emirates was held from the 30th November until 13th December 2023. This was a pivotal global agreement that aimed to transition away from fossil fuels and promote renewable energy sources. It recognised the urgent need to reduce GHG emissions and emphasised the importance of mitigating climate change. The agreement provided a significant boost to renewable energy industries and set the stage for countries to prioritise clean and sustainable energy generation. By committing to this transition, the international community took a crucial step towards addressing climate change and creating a more sustainable future. Key actions arising from COP28 include:

- Adoption of enhanced climate commitments and targets by participating countries, aimed at limiting global temperature rise to 1.5 degrees Celsius above pre-industrial levels.
- Development of mechanisms and strategies for implementing these commitments, including the mobilisation of financial resources to support developing nations in their climate mitigation and adaptation efforts.
- Advancing the implementation of the Paris Agreement, with a focus on transparency, accountability, and reporting of progress.
- Accelerating the global transition to clean, renewable energy sources and phasing out fossil fuel subsidies.
- Promoting nature-based solutions and conservation efforts to mitigate climate change and preserve biodiversity.
- Addressing the impacts of climate change, such as adaptation measures for vulnerable communities and sectors.
- Collaborating on international climate finance mechanisms, carbon pricing, and technology transfer to support climate action globally.
- Strengthening international partnerships and cooperation to foster shared responsibility and collective action in addressing climate change.

The final COP28 text includes a pledge whereby signatory countries commit to work together to triple the world's installed renewable energy generation capacity to at least 11,000 GW by 2030, taking into consideration different starting points and national circumstances.

COP29 Azerbaijan

COP29 took place in Baku, Azerbaijan between the 11th and 22nd of November 2024. There was a central focus on climate financing with agreements being reached on tripling finance to developing countries to help them protect their people and economies from climate-related disasters and also sharing the benefits of the boom in renewable energy. Key actions arising from COP29 include:

- Launch of the COP29 Global Energy Storage and Grids Pledge which commits signatories to a collective goal of deploying 1,500 GW of energy storage globally by 2030.
- COP29 Green Energy Pledge: Green Energy Zones and Corridors which promotes the connection of green energy zones and corridors to communities in need through the development of intraregional and interregional interconnected electricity grids.
- Call to action for an equitable and renewable energy transition, and increased renewable energy capacity globally.

Progress was also made on carbon markets and how they will operate under the Paris Agreement. Article 6 of the Paris Agreement allows countries to trade carbon credits, which are produced through reducing greenhouse gas emissions, to support other countries to meet their climate goals. Country-to-country trading and a carbon crediting mechanism have been made fully operational through agreements at COP29.

European Green Deal – European Climate Law (2021)

The European Green Deal, initially introduced by the European Commission in December 2019, sets out the 'blueprint' for a transformational change of the 27-country bloc from a high- to a low-carbon economy, without reducing prosperity and while improving people's quality of life, through cleaner air and water, better health and a thriving natural world. The Green Deal is intended to work through a framework of regulation and legislation setting clear overarching targets, e.g. a **bloc-wide goal of net-zero carbon emissions by 2050 and a 55% cut in emissions by 2030 (compared with 1990 levels)**. This is a substantial increase compared to the existing target, upwards from the previous target of at least 40% (2030 Climate & Energy Framework), and furthermore, these targets demonstrate the ambition necessary to keep the global temperature increase to well below 2°C and pursue efforts to keep it to 1.5°C as per the Paris Agreement. With regard to the energy sector, the Green Deal focuses on 3 no. key principles for the clean energy transition, which will help reduce GHG emissions and enhance the quality of life for citizens:

1. Ensuring a secure and affordable EU energy supply;
2. Developing a fully integrated, interconnected and digitalised EU energy market; and
3. Prioritising energy efficiency, improving the energy performance of our buildings and developing a power sector based largely on renewable sources (e.g. the subject development).

The European Climate Law[3] writes into law the objectives set out above in the European Green Deal for Europe's economy and society to become climate-neutral by 2050. Climate neutrality by 2050 means achieving net zero GHG emissions for EU countries as a whole, mainly by cutting emissions, investing in green technologies and protecting the natural environment. The Climate Law includes:

- A legal objective for the Union to reach climate neutrality by 2050;
- An ambitious 2030 climate target of at least 55% reduction of net emissions of GHGs as compared to 1990, with clarity on the contribution of emission reductions and removals;
- A process for setting a 2040 climate target, taking into account an indicative GHG budget for 2030-2050 to be published by the Commission;
- A commitment to negative emissions after 2050;
- The establishment of European Scientific Advisory Board on Climate Change, that will provide independent scientific advice;
- Stronger provisions on adaptation to climate change; and
- Strong coherence across Union policies with the climate neutrality objective.

The law aims to ensure that all EU policies contribute to this goal and that all sectors of the economy and society play their part. All 27 no. EU Member States have committed to turning the EU into the first climate neutral continent by 2050. One third of the 1.8 trillion-euro investments from the Next Generation EU Recovery Plan, and the EU's seven-year budget, will finance the European Green Deal. On 14th July 2021, the European Commission adopted a set of proposals[4] to make the EU's climate, energy, transport and taxation policies fit for reducing net GHG emissions by at least 55% by 2030, compared to 1990 levels.

Achieving these emission reductions in the next decade which is crucial to Europe becoming the world's first climate-neutral continent by 2050 would clearly be assisted by the Proposed Project.

2.2.1.2 Project Compliance with International Climate Policy

From the review of the relevant international climate policy documents, the Proposed Project will aid in reducing reliance on fossil fuels for electricity generation. This will help to achieve the UNFCC goals of limiting global temperatures as a result of climate change and the goals of the Kyoto Protocol and the several Conference of Parties agreements as outlined above. By making a just transition to more

[3] *European Climate Law was published in the Official Journal on 9 July 2021 and came into force on 29 July 2021.*
[4] *'Fit for 55': delivering the EU's 2030 Climate Target on the way to climate neutrality (July 2021)*

renewable forms of electricity generation, the level of carbon emissions will drop as our reliance on non-renewable forms of energy lessen.

The Proposed Project is also considered to be in line with the European Green Deal which also aims to reduce carbon emissions and achieve net zero carbon emissions by 2050. These goals will not be met if projects, such as the one proposed, are not implemented. The construction of this renewable energy development would also aid in ensuring energy security within the EU which is a target of the European Green Deal. As wind is an indigenous and abundant resource, countries can tap into their own wind potential, reducing the vulnerability to price fluctuations and geopolitical risks associated with fossil fuel imports.

2.2.2 National Climate Change Policy

Programme for Government – Our Shared Future (April 2021)

The Programme for Government- Our Shared Future (originally published in October 2020 and updated in April 2021) places specific emphasis on climate change, stating that the next ten years are a critical period in addressing the climate crisis, and therefore, a deliberate and swift approach to reducing more than half of Ireland's carbon emissions over the course of the decade (2020-2030) must be implemented. The programme states that the government are committed to reducing GHG emissions by an average 7% per annum over the next decade in a push to achieve a net zero emissions by the year 2050.

With regard to energy generation, the Programme notes that the government is committed to the rapid decarbonisation of the energy sector. The Programme states the government's ongoing support and commitment to take "*the necessary action to deliver at least 70% renewable electricity by 2030.*" This target has been updated by subsequent Climate Action Plans.

The Climate and Low Carbon Development (Amendment) Act 2021

The Climate Action and Low Carbon Development (Amendment) Act 2021 ('the Climate Act') legally binds Ireland to achieve net-Zero emissions no later than 2050, and to a **51% reduction in emissions by the end of this decade**.

The Climate Act provides the framework for Ireland to meet its international and EU climate commitments and to become a leader in addressing climate change. As indicated by the premise of the legislation, the reduction of emissions is a key proponent of the Climate Act and incorporates the following key provisions:

- Embeds the process of setting binding and ambitious emissions-reductions targets in law;
- Provides for a national climate objective, which commits to pursue and achieve no later than 2050, the transition to a climate resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy;
- Provides that the first two five-year carbon budgets proposed by the Climate Change Advisory Council should equate to a total reduction of 51% over the period to 2030, relative to a baseline of 2018;
- The role of the Climate Change Advisory Council has been strengthened;
- The government must adopt carbon budgets that are consistent with the Paris agreement and other international obligations;
- Actions for each sector will be detailed in the Climate Action Plan which must be updated annually; and
- Local Authorities must prepare individual Climate Action Plans which will include both mitigation and adaptation measures and will be updated every five years.

Under Section 15 of the Climate Act, public bodies are obliged to, in so far as practical, perform their functions in a manner consistent with the latest Climate Action Plan, the National Energy & Climate Plan 2021 – 2030 and other national climate mitigation and adaptation plans. KCC, as a public body, with consenting functions must comply with this obligation in determining the subject application.

The Proposed Project represents a significant opportunity to contribute to the 51% reduction in emissions being sought, which is as outlined above a legally binding requirement. The Proposed Project is therefore considered compliant with the relevant policies and objectives set out at both the European (e.g. European Green Deal) and national tiers of governance in this regard.

Carbon Budgets

The first national carbon budget programme proposed by the Climate Change Advisory Council, approved by Government and adopted by both Houses of the Oireachtas in April 2022 comprises three successive 5-year carbon budgets[5]. The total emissions allowed under each budget are shown in **Table 2-1 below**.

Table 2-1 Proposed Carbon Budgets of the Climate Change Advisory Council

	2021 – 2025 Carbon Budget 1	2026 – 2030 Carbon Budget 2	2031 – 2035 Provisional Carbon Budget 3
	All Gases		
Carbon Budget (Mt CO_2eq)	295	200	151
Annual Average Percentage Change in Emissions	-4.8%	-8.3%	-3.5%
The figures are consistent with emissions in 2018 of 68.3 Mt CO_2eq reducing to 33.5 Mt CO_2eq in 2030, thus allowing compliance with the 51% emissions reduction target by 2030.			

Section 6C of the Climate Act provides that the Minister shall prepare, within the limits of the carbon budget, the Sectoral Emissions Ceilings. These ceilings set out the maximum amount of GHG emissions that are permitted in each sector. The Government approved Sectoral Emissions Ceilings on 28 July 2022. The electricity sector is allocated a sectoral ceiling of 40 Mt CO_2 eq for the first budget (2021-2025) and a sectoral ceiling of 20 Mt CO_2 eq for the second budget period (2026-2030). In 2022, the electricity sector emissions were 10.1 Mt CO_2 eq[6].

Report of the Joint Committee on Climate Action - Climate Change: A Cross-Party Consensus for Action (2019)

In March 2019, the Joint Committee on Climate Action Change released a report detailing a cross party consensus for action. The report in its introduction states that *"Irelands performance in meeting international obligations has to date been poor"* (refer to *'Emissions Projections for Ireland'* below). The Report highlights on-going concern regarding emission projections and growing evidence that Ireland is off track in meeting its 2030 targets under the relevant the EU Directives.

The report states that the transformation of Ireland's energy system will be required for the country to meet its future 2030 and 2050 GHG emission targets; specifically, in order to reach net zero emissions by 2050, Ireland will be required to fully decarbonise electricity generation. Therefore, there is a clear incentive for developing, and safeguarding, Ireland's capacity in renewable energies and renewable electricity. Since this report was published, the Climate Act has been enacted and there have been recent progress / future scenario assessments (e.g. EirGrid's 'All Island Generation Capacity Statement 2022 – 2031' (October 2022)).

[5] *Climate Change Advisory Council Carbon Budget Technical Report (October 2021)* https://www.gov.ie/en/publication/9af1b-carbon-budgets/

[6] *Climate Change Advisory Council Annual Review 2023 (July 2023)* https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC-AR-2023-postfinal.pdf

Given the clear concern that the county's future emissions targets may be missed, it is crucial that projects such as the Proposed Project which can contribute in a meaningful manner towards climate change targets, and which can be provided without significant adverse environmental effects arising are brought forward and supported with favourable consideration through the planning system and constructed.

Climate Action Plan 2023

The Climate Action Plan 2023 ('CAP23') was published in December 2022 by the Department of the Environment, Climate and Communications. This outlines the actions required to 2035 and beyond to meet Ireland's commitment to becoming carbon neutral by 2050. CAP23 sets out a roadmap to deliver on Irelands climate ambition and is aligned to ensure that Ireland achieves its legally binding target (the Climate Act) of net-zero GHG emissions no later than 2050.

A target aims for a reduction in emissions of 51% over the period 2018 to 2030 and in doing so, prevent / mitigate the potentially devastating consequences of climate change on Ireland's environment, society, economy and natural resources. The CAP23 states that to do so, Ireland must harness the untapped indigenous renewable resources, and has a target of achieving 80% of energy being produced from renewable sources by 2030 (unchanged from the previous Climate Action Plan, 2021) with a target of 9GW of that being produced by onshore wind. Measures set out in CAP23 to achieve these targets include to 'accelerate and increase the deployment of renewable energy to replace fossil fuels' (Section 12.1.4 CAP23). It is clear from the message and ambition of CAP23 that the drive to deploy renewable energy projects such as the Proposed Project in Ireland are critical to achieving the aims and objectives of CAP23 including the 9GW of onshore wind energy by 2030 and carbon neutrality by 2050.

> *"Achieving these ambitions will require a coordinated effort across Ireland and every economic sector will be involved. It requires no less than a national transformation over the coming years in how we work, travel, heat out homes, source our energy and use our land".*

Decarbonisation of the electricity sector is, as noted in CAP23, key to the decarbonisation of other sectors who will depend on electrification including transport, heating and industry. The increase in portion of renewable electricity of 80% by 2023 will come in part from a targeted 9GW of onshore wind. The plan notes:

> *"Achieving further emissions reductions between now and 2030 requires a major step up in how we accelerate and increase the deployment of renewable energy to replace fossil fuels, deliver a flexible system to support renewables, and manage electricity demand"".*

Chapter 12 of CAP 23 sets out the state of play, targets and actions for the decarbonisation of the Electricity sector. Carbon emissions from electricity have fallen by 45% between 2005 and 2020, falling by 19% between 2005-2012 and by 33% between 2012 and 2020. This trend is largely due to the availability of renewable energy generated electricity (a sixfold increase between 2005 and 2020) and an associated reduction in the use of carbon heavy fuels such as peat and coal.

Due to the scale of the challenge, and the recognition of central role of the electricity sector in achieving sector wide targets, the electricity sector has been allocated the smallest carbon budget and will require the steepest carbon emissions decline of all sectors – namely a reduction in carbon emission by -75% relative to 2018 baseline. Carbon budgets 1 and 2 allow for 30.02 MtCO2eq from the electricity sector up to 2025 and 20 MtCO2eq. from 2026-2030. This means an average of 8 MtCO2eq. per annum. Emissions for the period 2021 were 9.98 MtCO2eq., which is in exceedance of 8 MtCO2eq., which means that to keep on track, electricity will now have to achieve annual emissions of c. 7.5 MtCo2eq. from 2022 to 2025.

The measures set out for the electricity sector include *inter alia*:

- Reduce annual CO2eq. emissions from the sector to 3 MtCO2eq by 2031 (75% reduction compared to 2018);
- Accelerate and increase the deployment of renewable energy to replace fossil fuels;
- Accelerate the delivery of onshore wind, offshore wind and solar through a competitive framework to reach 80% of electricity demand from renewable energy by 2030;
- Target 6GW of onshore wind and up to 5 GW of solar by 2025;

- Target 9 GW onshore wind, 8 GW Solar and at least 5 GW of offshore wind by 2030;
- Align the relevant constituent elements of the planning and permitting system to support accelerated renewable energy development, supported by national policy and associated methodologies to inform regional and local planning policies, noting that Development Plans are obliged to set out objectives to facilitate energy infrastructure;

Having regard to the targets and measures set out above, it is clear that there is strong policy support for the provision of additional renewable energy generators, such as the Proposed Project.

Climate Action Plan 2024

The Climate Action Plan 2024 ('CAP 24') builds on CAP23 by refining and updating the status of the actions required to deliver the decarbonisation required under the carbon budgets and sectoral emissions ceilings. The renewable electricity generation targets are unchanged from the CAP23 (9GW of onshore wind & 80% renewable electricity share).

CAP 24 includes the latest trends in the electricity sector:

- In 2022, renewable generation accounted for 38.6% of electricity, an increase from 35% in 2021.
- Electricity accounted for 14.4% of Ireland's GHG emissions in 2022.
- To meet the first carbon budget the electricity sector requires a decarbonisation rate of 17.3% per annum in the period 2023-2025. For context, the decarbonisation rate between 2018 and 2022 was 1.4% per annum.

CAP 24 acknowledges the urgency and importance of the decarbonising the electricity sector. The plan states:

> *"Given that the programme of large-scale offshore wind deployment is expected to be realised towards end decade, deployment rates for onshore renewables will need to increase to match demand growth to ensure we keep electricity emissions within range of the carbon budgets. This requires a major upscaling and accelerating in current deployment of renewables, particularly onshore wind."*

The scale of the challenge is apparent when quantified:

> *"As an example, the historical average deployment of onshore wind installed capacity connected between 2008 and 2020 inclusive was ~280 MW per annum from 19 projects (with an annual maximum of 612 MW). To achieve the necessary emissions abatement, an approximately eight times increase of renewable energy deployment to 2.3 GW annually would be needed between 2024 and 2030."*

CAP 24 identifies the alignment of local and national policy as critical to accelerate renewable energy rollout.

> *"greater alignment between local plans and renewable energy targets at national and regional level to support investment in and delivery of onshore wind and solar renewable energy is also critical."*

Having regard to the targets and measures set out above, it is clear that there is strong policy support for the provision of additional renewable energy generators, such as the Proposed Project.

2.2.2.2 Project Compliance with National Climate Policy

The Proposed Project aligns with the national climate policy objectives. The Proposed Project will make a significant contribution to achieving the CAP24 target of 9GW of onshore wind energy by the year 2030. Furthermore, the Proposed Project will aid Ireland in adhering to, or limiting the exceedance of, the country's carbon budgets. Currently, the electricity sector is rapidly approaching the designated

sectoral ceiling of 20 Mt CO2 eq for the first carbon budget period from 2020 to 2025. The national renewable energy targets and the carbon budgets are integral to the government's response to the climate crisis.

2.3 Renewable Energy Policy and Targets

This section of the EIAR provides a breakdown of international and national renewable energy policy with regards to the Proposed Project. Under this section, the following are discussed:

- EU Renewable Energy Policy
- National Renewable Energy Policy

National policy has developed in line with European and international policies, targets and commitments, in that the importance and urgency of decarbonising the energy generation sector, the economy in general and reducing GHG emissions has become increasingly more apparent.

The Proposed Project complies with the nationally stated need to provide a greater amount of renewable energy onto the national grid and will further reduce the national reliance on fossil fuels for electricity generation.

2.3.1 European Renewable Energy Policy

Renewable Energy Directive

The Renewable Energy Directive is the EU legal framework for the development of renewable energy across all sectors of the EU economy, supporting clean energy cooperation across EU countries. Since the introduction of the Renewable Energy Directive (RED) in 2009, it has undergone several revisions since then and these revisions, the most recent of which occurred in November 2023. Since its adoption in 2009, the share of renewable energy sources in energy consumption has increased from 12.5% in 2010 to 23% in 2022[7]. Of the 27 EU member states the lowest proportions of renewables were recorded in Ireland (13.1%). Crucially, the Renewable Energy Directive sets the overall target for renewable energy in the EU.

RED I - 2009

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

RED II – 2018

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

RED III – 2023

In November 2023, a revision of the Renewable Energy Directive[8] (RED III), came into force. RED III increases the EU wide renewable energy target from 32% set under the previous revision of the directive to at 42.5%, with an ambition to reach 45% by 2030. The increase was proposed under the publication of

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

REPowerEU plan in May 2022. The Directive also introduces specific targets for Member States in the industry, transport, and building (district heating and cooling) sectors.

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

There is an 18-month period to transpose most of the directive's provisions into national law, with a shorter deadline of July 2024 for some of the provisions related to permitting for renewables, in particular Article 16(f) which establishes the legal presumption that the construction and operation of renewable energy development and storage assets are in the "*overriding public interest and serving public health and safety when balancing legal interest in individual cases for the purposes of Article 6(4) and Article 16(1), point (c), of Directive 92/43/EEC [the 'Habitats Directive'], Article 4(7) of Directive 2000/60/EC [the 'Water Framework Directive'] and Article 9(1), point (a), of Directive 2009/147/EC.[the 'Birds Directive']*".

Regulation 2022/2577

In recognition of the worsening energy crises arising from Russia's war against Ukraine, the Council of the European Union adopted Regulation (EU) 2022/2577 on 22 December 2022, '*Laying down a framework to accelerate the deployment of renewable energy.*' This regulation, which has immediate and direct effect in Member States, applies to "*all permit-granting processes that have a starting date within the period of its application*" and includes a number of tangible measures aimed at streamlining the permit-granting process and facilitating the accelerated deployment of renewable energy. The period of application of the Regulation is the 30 December 2022 to 29 June 2024 with a provision for this to be reviewed and extended. The period of application of the Regulation was subsequently extended to the 30 June 2025 and therefore applies to the present application and EIA.

> *'A fast deployment of renewable energy sources can help to mitigate the effects of the current energy crisis, by forming a defence against Russia's actions. Renewable energy can significantly contribute to counter Russia's weaponisation of energy by strengthening the Union's security of supply, reducing volatility in the market and lowering energy prices.'*[9]

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

1. *'The planning, construction and operation of plants and installations for the production of energy from renewable sources, and their connection to the grid, the related grid itself and storage assets shall be presumed as being in the overriding public interest and serving public health and safety when balancing legal interests in the individual case, for the purposes of Article 6(4) and Article 16(1)(c) of Council Directive 92/43/EEC, Article 4(7) of Directive 2000/60/EC of the European Parliament and of the Council and Article 9(1)(a) of Directive 2009/147/EC of the European Parliament and of the Council....'*
2. *'Member States shall ensure, at least for projects which are recognised as being of overriding public interest, that in the planning and permit-granting process, the construction and operation of plants and installations for the production of energy from renewable sources and the related grid infrastructure development are given priority when balancing legal interests in the individual case.... (emphasis added)'*

The Regulation was introduced as a temporary, emergency measure and included provision for the EU Commission to review the application of, and continued need for, the measures included in the

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

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

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

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

While Article 3(1) of the Regulation is mirrored in Article 16(f) of REDIII, the wider obligation placed on competent authorities engaged in the consenting of renewable energy projects under Article 3(2) of Regulation 2022/2577 is not and, as explained in Recital 14 of Regulation 2024/223, is an appropriate additional temporary measure given the particular difficulties which the Union is currently facing in the supply of energy. In considering applications for the development of such projects planning authorities are obliged to give effect to this legislative imperative.

Energy Roadmap 2050

The Energy Roadmap 2050 was published by the European Commission in 2011 and analyses the transition of the contemporary energy system in ways that would be compatible with the GHG reductions targets as set out in the Renewable Energy Directive (Directive 2009/28/EC) while also increasing competitiveness and security of supply. To achieve these targets and objectives, the Roadmap states that significant investments will need to be made in new low-carbon technologies and renewable energy, e.g. wind energy infrastructure, energy efficiency and grid infrastructure. Five main routes are identified to achieving a more sustainable, competitive and secure energy system in 2050:

- High Energy Efficiency;
- Diversified Supply Technologies;
- High Renewable Energy Sources;
- Nuclear energy; and
- Carbon capture and storage.

The analysis found that decarbonising the energy system is technically and economically feasible. The Roadmap notes that all scenarios show the biggest share of energy supply technologies in 2050 comes from renewables. In this regard, it should be noted that the Climate Change Advisory Council states

within their 2023 Annual Review (July 2023) that *"at the current rate of policy implementation, **Ireland will not meet the targets set in the first and second carbon budget periods unless urgent action is taken immediately and emissions begin to fall much more rapidly.**"* As such, a major prerequisite for a more sustainable and secure energy system is a higher share of renewable energy up to and beyond 2030 to 2050. Each of the scenarios assumes in the analysis that increasing the share of renewable energy and using energy more efficiently are crucial, irrespective of the particular energy mix chosen.

The Proposed Project will aid in achieving the scenarios set out in the Energy Roadmap 2050 as if consented, the Proposed Project will increase the share of renewable energy being produced onto the national grid thereby reducing the reliance on more unsustainable forms of electricity production.

European Green Deal

The European Green Deal was launched in December 2019 and proposes to increase the binding target of renewable sources in the EU's energy mix from 32% to **40% by 2030** via amendments to the Renewable Energy Directive as per the 'Fit for 55' package (July 2021)[10]. The Deal recognises that 75% of the EUs GHG emissions stems from the production and use of energy, hence emphasising the need to decarbonise the EU's energy system. The deal identifies three key principles to support a clean energy transition:

1. *ensuring a secure and affordable EU energy supply*
2. *developing a fully integrated, interconnected and digitalised EU energy market*
3. *prioritising energy efficiency, improving the energy performance of our buildings and developing a power sector based largely on renewable sources*[11].

REPowerEU

REPowerEU, launched in May 2022 by the European Commission, proposes an outline of a plan to make Europe independent from Russian fossil fuels, starting with gas, due to the high and volatile energy prices, and security of supply concerns following Russia's unprecedented military attack on Ukraine. Currently, the EU imports 90% of its gas consumption, with Russia providing around 45% of those inputs. Russia also accounts for around 25% of oil and 45% of coal imports. Phasing out dependence on fossil fuels can be done well before 2030, increasing the resilience of the EU-wide energy system based on two pillars:

1. Diversifying gas supplies, via higher Liquefied Natural Gas (LNG) and pipeline imports of biomethane and renewable hydrogen production and imports from non-Russian suppliers
2. Reducing faster the use of fossil fuels by boosting energy efficiency, increasing renewables and addressing infrastructure bottlenecks.

With full implementation of the measures in REPowerEU Plan, at least 155 billion cubic metres (bcm) of fossil gas use could be removed, which is equivalent to the volume imported from Russia in 2021. Nearly two thirds of that reduction can be achieved within a year. A part of this plan includes:

> *'Speeding up renewables permitting to minimise the time for roll-out of renewable projects and grid infrastructure improvements'.*

In September 2023, the European Parliament agreed to update the Renewable Energy Directive. The updates including raising the share of renewables in the EU' s final energy consumption to 42.5% by 2030 with Member States encouraged to achieve 45% and a more efficient approval procedure for deploying renewables in Europe. In addition, as a part of the REPowerEU Plan, the European Commission has proposed a series of additional targeted amendments to the renewable energy directive to reflect the ongoing changes in the energy landscape and the continued invasion of Ukraine. This will make the sector more efficient and reach the set goals faster.

[10] *https://www.consilium.europa.eu/en/policies/eu-plan-for-a-green-transition/*
[11] *https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/energy-and-green-deal_en*

In addition, the REPowerEU Plan highlights the overriding public interest in achieving renewable energy targets. The REPowerEU Plan states that: "the revised proposal operationalises the principle of ***renewable energy as an overriding public interest***, *introduces the designation of* ***'go-to' areas*** *and other ways to shorten and simplify permitting while also minimising potential risks and negative impacts on the environment."* This highlights the importance of public interest and incentive to achieve the renewable energy target, highlighting the importance of appropriate designation of sufficient areas for wind energy development by local authorities within the EU.

2.3.1.2 Project Compliance with EU Policy

The Proposed Project is considered to be fully in accordance with and supported by the above-mentioned EU Policy. The Proposed Project will contribute to the targets outlined in the 2030 Climate and Energy Framework. An EU wide binding target of 27% renewable energy by 2030 and a target of at least 27% energy efficiency by 2030 are both targets that can be achieved through the delivery of the Proposed Project and other similar projects. The target of increasing the binding target of the EUs energy mix from 32% to a minimum of 42.5% by 2030 is also considered to be a target that would be achievable by the construction of schemes such as the one proposed. Similarly, in the Energy Roadmap 2050 which considers scenarios which will lead to achieving the EUs climate action and energy goals. The Roadmap notes that all scenarios show the biggest share of energy supply technologies in 2050 comes from renewables. Therefore, it is submitted that the Proposed Project is in line with the EU Energy Roadmap.

The RePowerEU plan, aims at increasing the energy security within the EU and increasing the share of renewable energy onto the EU electricity grid. A part of this plan includes *'Speeding up renewables permitting to minimise the time for roll-out of renewable projects and grid infrastructure improvement.'* This will make the sector more efficient and reach the set goals faster. Therefore, it is considered that the Proposed Project is strongly supported by EU energy policy.

2.3.2 National Renewable Energy Policy

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

On 19th June 2020, the updated Green Paper on Energy Policy in Ireland was published. The Paper which was originally published on 14th May 2014 marked the start of a public consultation process on the future of Ireland's energy policy over the medium to long-term. The Department of Communications, Climate Action & Environment acknowledged that energy is an integral part of Ireland's economic and social landscape and that *"a secure, sustainable and competitive energy sector is central to Ireland's ability to attract and retain Foreign Direct Investment and sustain Irish enterprise. The three key pillars of energy policy are to focus on security, sustainability and competitiveness".*

Following on from an extensive consultation process, a Government White Paper entitled 'Ireland's Transition to a Low Carbon Energy Future 2015-2030' was published in December 2015 by the (then) Department of Communications, Energy and Natural Resources ("DCENR"). This Paper provides a complete energy update and a framework to guide policy up to 2030. The Paper builds upon the White Paper published in 2007 and takes into account the changes that have taken place in the energy sector since 2007.

The policy framework was developed 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 to ensure a low carbon future that maintains Ireland's competitiveness and ensures a supply of affordable energy. The Energy Vision 2050, as established in the White Paper, describes a *'radical transformation'* of Ireland's energy system which will result in GHG emissions from the energy sector reducing by between 80% and 95%, compared to 1990 levels. The paper advises that a range of policy measures will be employed to achieve this vision with emphasis on the generation of electricity from renewable sources, which there are plentiful indigenous supplies and increasing the use of electricity and bio energy to heat homes and fuel transport.

In this White Paper, the DCENR acknowledges that onshore wind is one of the cheapest forms of renewable energy in Ireland, stating that:

"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. This results in a lower cost of support."

The Green Paper on Energy Policy in Ireland 2015-2030 was updated and republished in 2020 and updated again in January 2021. The updated Paper outlines that:

'The 2020 target of 40% RES-E is likely to require a total of 3,500-4,000 MW of onshore renewables generation capacity, compared to the 2,500 MW available at end December 2014, of which wind generation accounted for 2,200MW. ***To achieve our target, the average rate of build of onshore wind generation will need to increase to up to 260 MW per year. The current rate of build is about 170 MW per year.'***

Furthermore, the White Paper outlines that Solar technology is rapidly becoming cost competitive for electricity, not only compared with other renewables but also compared with conventional forms of generation, it recognises that:

"The deployment of solar in Ireland has the potential to increase energy security, contribute to our renewable energy targets, and support economic growth and jobs."

National Energy Security Framework

More recently, the National Energy Security Framework (DECC, April 2022) highlights clearly the impacts the Russian invasion of Ukraine and the resulting war has had on Europe's energy system. The resulting decision by the European Union to phase out the import of Russian gas, oil and coal has brought to the fore the importance of security of supply and how energy policy is designed for long-term resilience. It takes account of the need to decarbonise society and economy, to reduce Ireland's emissions by 51% over the decade to 2030 and reach net zero emissions by 2050. According to the SEAI's Energy in Ireland (2020) report, oil accounts for 54% of Ireland's primary energy requirement making it one of the highest rates of oil dependency in the EU. The International Energy Agency, of which Ireland is a member country, includes a 10-point plan to cut oil use which calls for an acceleration in the deployment of wind and solar projects. Ireland's response per the Framework is set out over three themes:

- Theme 1 – managing the impact on consumers and businesses
- Theme 2 – ensuring security of energy supply in the near-term
- Theme 3 – reducing our dependency on imported fossil fuels in the context of the phasing out of Russian energy imports across the EU.

In relation to theme 3, the Framework highlights that replacing fossil fuels with renewables, including wind energy, will be a focus area of work. The Framework calls for *"Supportive policies across Government and State agencies"* which *"can reduce barriers and fast track permitting for renewable energy generation projects. Similarly, renewable energy developers need to match this through taking a leadership role in delivering high quality applications to relevant consenting authorities, meeting project milestones on time and minimising delays."* There are a number of 'Responses' set out in the Framework aimed at reducing reliance on imported fossil fuels and increasing indigenous renewable energy generation, including Response 25 which seeks the alignment of all elements of the planning system to support accelerated renewable energy development.

The Government published an update to this in November 2023 which outlines a new strategy to ensure energy security in Ireland for this decade, while ensuring a sustainable transition to a carbon neutral energy system by 2050. The Energy Security Package emphasizes the need to prioritize, monitor, and regularly review energy security during the transition period. It proposes measures focusing on:

1. *Reduced and Responsive Demand*
2. *Transition to Renewables*
3. *Building More Resilient Systems*
4. *Implementing Robust Risk Governance*

The report details mitigation measures under each area, such as expanding indigenous renewable energy capacity, diversifying fuel sources, and enhancing governance structures. Lessons from European energy supply disruptions and domestic electricity sector challenges inform the strategic approach.

Six key pillars guide the response and recommendations outlined in "Energy Security in Ireland to 2030," which includes a public consultation and external reviews. The Government plans to release follow-up reports every five years, with implementation oversight by the Governments Energy Security Group.

Having regard to the above, it is clear that the provision of additional renewable energy generation, such as the Proposed Project is vital in helping to secure the State's energy supplies and reduce reliance on imported fossil fuels.

Energy Security in Ireland to 2030 – Energy Security Package

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

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

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

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

Independent research undertaken as part of the package, McCarthy Report[12], provides an analysis of developments in the electricity sector in Ireland. The McCarthy Report makes the following observation in relation to the consenting process:

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

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

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

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

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

[12] *https://www.gov.ie/pdf/?file=https://assets.gov.ie/276441/eb496e01-5c01-4594-af09-74342b4ac971.pdf#page=null*

2.3.2.2 Project Compliance with the National Renewable Energy Policy

The National Energy Security Framework outlines several steps to accelerate Ireland's shift to renewable energy initiatives. It's evident that the Proposed Project aligns with this framework by increasing the proportion of renewable energy on the national grid, thus expediting Ireland's transition to a low-carbon energy future.

2.4 Climate and Renewable Energy Target Progress

At a European level, the latest data shows that, as of 2022, 23% of energy came from renewable energy sources[13]. This represents an increase of 1.1% compared to 2021 levels. While progress is being made to increase the share of renewable energy, it is clear that all EU member states need to intensify their efforts to collectively comply with the target of 42.5% set in the latest revision of the renewable energy directive.

Of the 27 EU member states, Ireland has the lowest proportion of renewable energy at 13.1%. It is evident that Ireland is not performing well when compared against our European counterparts and that urgent action is required to increase the overall share of renewable energy in our gross final energy consumption. When it comes to the share of renewable energy in electricity, Ireland does perform better generating 36.8% in 2022, but still below the EU average of 41.1%[14].

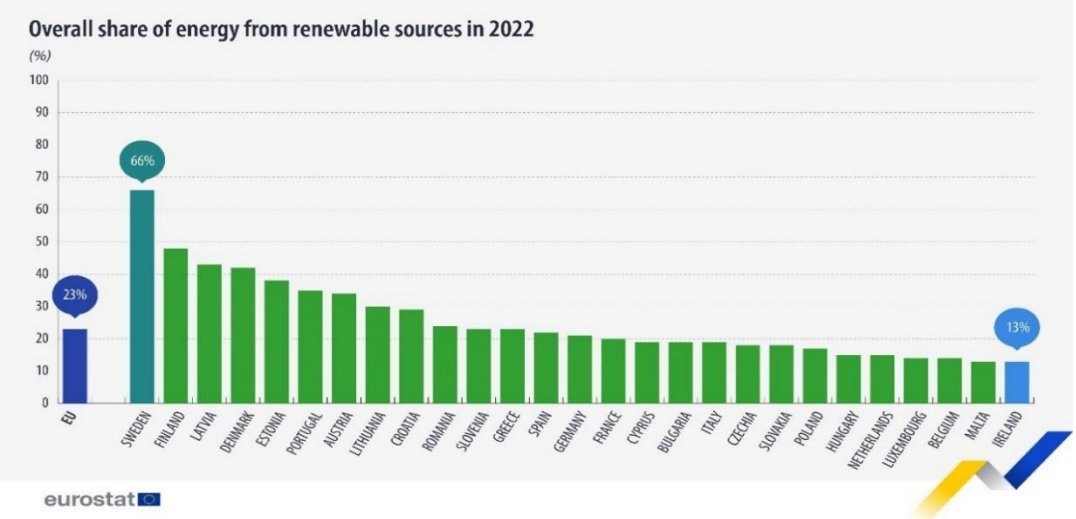

Figure 2-1: Overall share of energy from renewable sources (source: Eurostat)

Ireland's Greenhouse Gas Emissions Projections 2022 – 2040 (June 2023)

The Environmental Protection Agency (EPA) publish Ireland's Greenhouse Gas Emission Projections and at the time of writing, the most recent report, 'Ireland's Greenhouse Gas Emissions Projections 2023–2050' was published in May 2024. The report includes an assessment of Ireland's progress towards achieving its emission reduction targets out to 2030 set under the EU Effort Sharing Regulation (ESR).

The EPA has produced two scenarios in preparing these GHG emissions projections: a "With Existing Measures" (WEM) scenario and a "With Additional Measures" (WAM) scenario. These scenarios forecast Irelands GHG emissions in different ways. The WEM scenario assumes that no additional policies and measures, beyond those already in place by the end of 2022. This is the cut off point for which the latest national GHG emission inventory data is available, known as the 'base year' for

[13] https://ec.europa.eu/eurostat/en/web/products-eurostat-news/w/ddn-20231222-2
[14] https://ec.europa.eu/eurostat/databrowser/view/nrg_ind_ren__custom_9264705/default/bar?lang=en

projections. The WAM scenario has a higher level of ambition and includes the latest government policies and measures (at the time the Projections are compiled) to reduce emissions such as those in Ireland's Climate Action Plan 2024.

The EPA Emission Projections Update notes the following key trends:

- Ireland is not on track to meet the 51 per cent emissions reduction target (by 2030 compared to 2018) based on these projections which include most 2024 Climate Action Plan measures.
- The first two carbon budgets (2021-2030), which aim to support achievement of the 51 per cent emissions reduction goal, are projected to be exceeded by a significant margin of between 17 and 27 per cent.
- Ireland will not meet its non-Emissions Trading Scheme (ETS) EU targets of a 42 per cent emissions reduction by 2030 in WAM even with both the ETS and Land use, Land use Change and Forestry (LULUCF) flexibilities.
- Sectoral emissions ceilings for 2025 and 2030 are projected to be exceeded in almost all cases, including Agriculture, Electricity, Industry, and Transport.
- Emissions from the Energy Industries sector are projected to decrease by between 57 and 62 per cent over the period 2022 to 2030. Renewable energy generation at the end of the decade is projected to range from 69 to 80 per cent of electricity generation as a result of projected further and rapid expansion in wind energy and other renewables

As decarbonising electricity generation will have a significant positive contribution in achieving Ireland's emissions it is clear that additional renewable energy production such as that of the Proposed Project must be encouraged and supported if carbon saving targets are to be met.

National Energy Projections (November 2023)

The National Energy Projections report was published by the SEAI in November 2023 sets outs the most recent updates to Ireland's progress towards its binding European and National renewable energy targets. Based on the EPA projections outlined above published in June 2023, the report presents the findings of the 2023 national energy and climate modelling cycle.

The existing EU wide target set in REDII is 32% RES by 2030. Irelands current national EU binding target for 2030 RES is 34.1%. There are also interim targets for 2022, 2025 and 2027, as shown in **Table 2-2** below. Since the publication of the *National Energy Projections* report, the European Parliament and Council have introduced REDIII, increasing this target to a minimum of 42.5% RES by 2030. It is likely that Ireland's national target will increase in line with the increase at EU level.

Table 2-2: Overall renewable energy share projections under EPA scenarios

Current REDII target for overall renewable energy share (RES) for Ireland		WEM	WAM - CAP 21	WAM – CAP23
2025	Projected overall RES	19%	20%	22%
	REDII overall RES target for Ireland	24%	24%	24%
	Gap to target	-4%	-3%	-2%
2027	Projected overall RES	22%	26%	27%
	REDII overall RES target for Ireland	28%	28%	28%
	Gap to target	-5%	-2%	-1%
2030	Projected overall RES	31%	40%	45%
	REDII overall RES target for Ireland	34%	34%	34%
	Gap to target	-3%	6%	11%

In the interim years of 2025 and 2027, the WAM-CAP23 scenario indicates a failure to meet the interim overall RES targets. This is attributed to the revised profile of renewable generation capacity additions,

which now assumes that more of the planned capacity will arrive later in the decade. If Ireland's target aligns with the increased EU-level goal under RED III, it would widen the gap to the target during the interim years.

The decarbonisation of the electricity generation is critical considering the need to electrify other sectors such as heating and transport in order to achieve the sectoral decarbonisation targets. By 2030, renewable energy sources are anticipated to dominate electricity generation, particularly experiencing a significant surge later in the decade attributed to the integration of substantial offshore wind projects. In the CAP23 scenario, there is an expedited deployment of onshore renewable generation capacity in the earlier years of the decade compared to the CAP21 scenario. However, both scenarios aim to achieve a similar overall percentage of electricity derived from renewable sources (RES-E) by the year 2030.

Figure 4: Fuel use for electricity generation

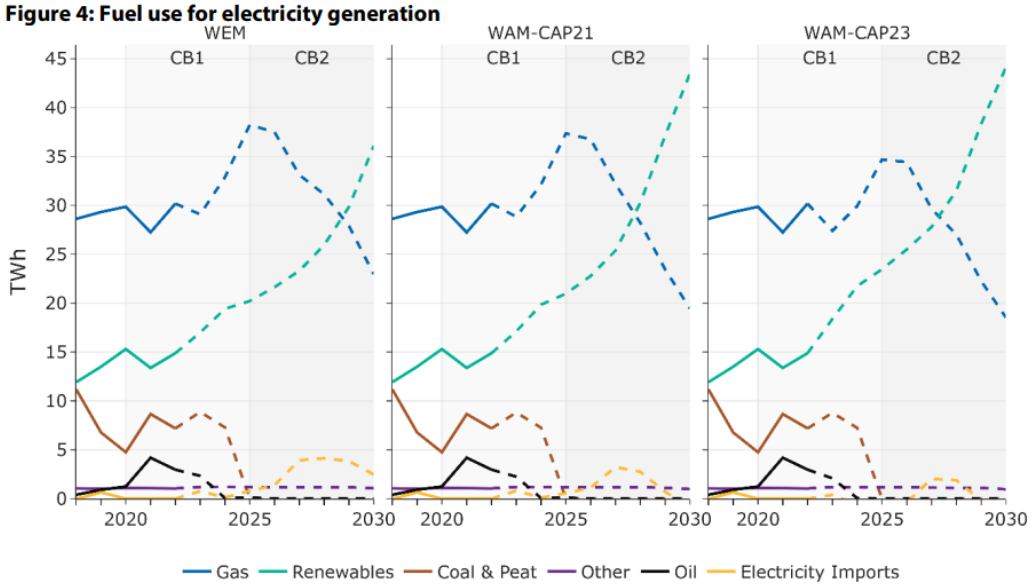

Figure 2-2: Electricity generation by fuel source (source: SEAI)

The report projects GHG emissions under the WEM and WAM scenarios. It is projected that in both the WEM and WAM scenarios, the carbon budget for the electricity sector will be exceeded. This is largely due to the cumulative nature of the carbon budgets, where exceedances in the early years results in steeper emissions reductions in the latter years to compensate. In the WEM scenario, emissions are projected to reach the first sectoral ceiling in 2024. This results in a significant overspend of 7.4 $MtCO_2eq$ (19%) within the final 2 years of the first carbon budget period 2020–2025. This would have a knock-on effect on the second carbon budget period 2025-2030, which would likely be unattainable from the outset.

Under the WAM CAP23 scenario, cumulative emissions reach the first sectoral ceiling in the 2024, leading to an overspend of the first budget period by 5.6 $MtCO_2eq$ 2024-2026. Despite the improvement on the WEM scenario, the WAM CAP23 scenario exceeds the second budget period (2025 – 2030) ceiling by 2027. By the end of the decade, the WAM CAP23 scenario projects an exceedance of 13.8 $MtCO_2eq$ (23%).

It is clear from the projections outlined above that unprecedented action is required as soon as possible. Unless carbon emissions are reduced sharply before 2025, it will be impossible to stay within the second budgeting period as required to by law under the Climate Act.

Energy in Ireland (December 2023)

The SEAI *Energy in Ireland 2023* was published in December 2023 and set outs the most recent updates to Ireland's progress towards its binding European and National renewable energy targets. Some of the key points from this report are outlined below (from 2022):

- Ireland imported 81.6% of its total primary energy requirement.

- 85.8% of Ireland's primary energy requirement came from fossil fuel.
- Ireland's total energy demand was 4.7% higher than in 2021.
- Demand for electricity was 2.5% higher than in 2021, consistent with the annual growth of recent years.

The SEAI report illustrates (Figure 6) the summary of sectoral ceilings within the first two carbon budgets, over the periods 2021-2025 and 2026-2030 – copied below in **Figure 2-3**.

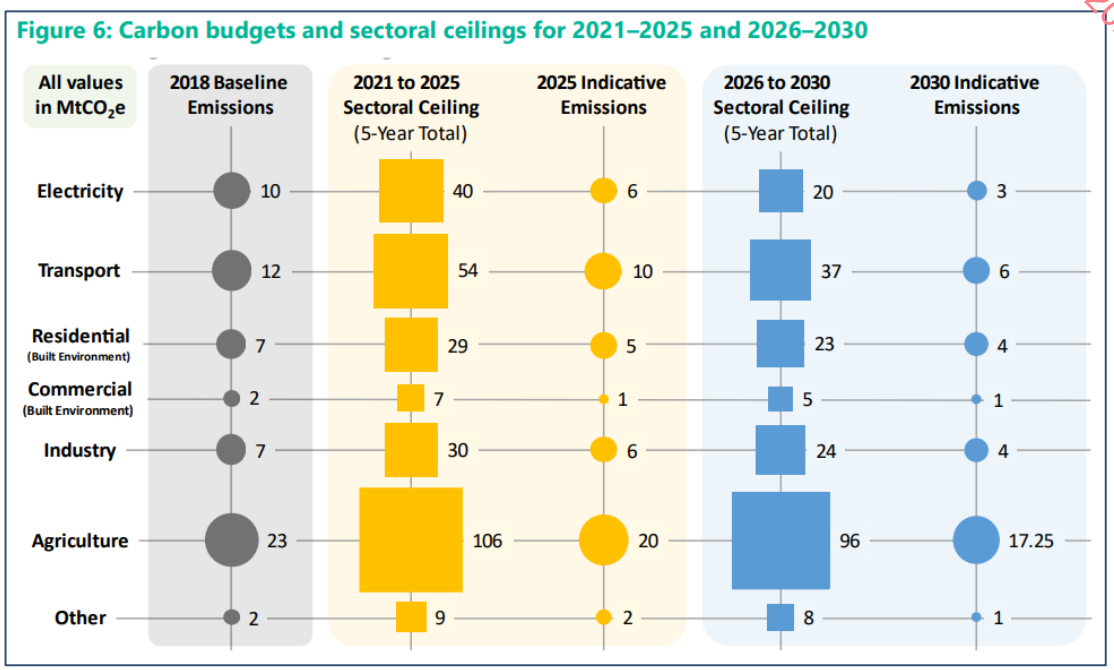

Figure 2-3 Carbon Budgets and Sectoral Ceilings for 2015-2025 and 2026-2030 (SEAI Energy in Ireland 2022)

The emissions ceiling for the electricity sector from 2021 to 2025 stands at 40 MtCO2e in total, with an annual average of 8 MtCO2e (indicated by the dotted bars). In the initial two years of this period, sectoral emissions totalled 19.74 MtCO2e, leaving a remaining budget of 20.26 MtCO2e for 2023-2025, equivalent to an annual average of 6.75 MtCO2e (shown by the dark grey bars).

The report confirms that wind accounted for 85.7% of renewable electricity generated in 2022 having 4.54GW of installed wind capacity in 2022. SEAI's provisional estimate for installed wind capacity in 2023 is based on EirGrid data to the end of August, and ESBN data to the end of September, and totals 4.59 GW.

Security of supply is a focus in the report, noting *"In 2022, Ireland imported 81.6% of its total primary energy requirement. For comparison, the average energy import dependency of all EU member states was 57.5% in 2020. Ireland has a high energy import dependency because it imported all its coal and oil products, and 74.0% of its natural gas supplies."*

The Climate Change Advisory Council Annual Review 2023

The Climate Change Advisory Council (CCAC) concluded within their '*2023 Annual Review*' that at the current rate of policy implementation, *"Ireland will not meet the targets set in the first and second carbon budget periods unless urgent action is taken immediately and emissions begin to fall much more rapidly"*.

In relation to the rollout of renewable energy, the CCAC note that the current rate of renewable energy connections to the national grid needs to increase substantially in order to meet CAP23 targets. The CCAC state:

> *"The current rate of connecting renewables will need to more than double to meet NCAP 2023 targets for 9GW of onshore wind and 8GW of solar power connected to the electricity system*

by 2030, which for context equates to a further approximately 1,500MW of onshore renewables connected to the electricity system on average each year."

The CCAC reiterates the importance of EU Regulation 2022/2577 and its objective to ensure "*the planning, construction and operation of plants and installations for the production of renewable energy is presumed to be in the overriding public interest".* The CCAC acknowledge the quantity of planning applications necessary to achieve the CAP 23 target of 9GW of onshore wind energy and advise that further resources are put in place to ensure that the consenting authorities are well resourced to assess these applications.

Ireland's Climate Change Assessment (January 2024)

In January 2024, the EPA published Irelands Climate Change Assessment (ICCA). This assessment provides a comprehensive overview and breakdown of the state of knowledge around key aspects of climate change with a focus on Ireland. The ICCA report is presented in four volumes.

- Volume 1: Climate Science – Ireland in a Changing World
- Volume 2: Achieving Climate Neutrality in 2050
- Volume 3: Being Prepared for Irelands Future
- Volume 4: Realising the Benefits of Transition and Transformation

The ICCA Synthesis Report states that having peaked in 2001, Irelands GHG emissions have reduced in all sectors except agriculture. However, Ireland currently emits more GHGs per person than the EU average. The report goes on to state that there has been an identified gap in policy that indicates that Ireland will not meet its statutory GHG emission targets. Achieving net zero carbon dioxide emissions by 2050 requires significant and unprecedented changes to Ireland's energy system. Policies tailored to suit different stages of technology development are critical for achieving a net zero energy system. Established technologies, such as wind energy, solar photovoltaics and bioenergy will be key in meeting short-term emission reduction targets (i.e. 2030), whereas offshore wind infrastructure is expected to be the backbone of future energy systems. This can only be achieved with appropriate support schemes, regulation and investments for synergistic growth of offshore wind and other renewable technologies.

There are well-established 'no-regret options' that need to happen now, which can get Ireland most of the way to net zero carbon dioxide emissions. Beyond that, there are 'future energy choices' relating to the scale and magnitude of technologies that will assist in achieving Ireland statutory climate targets. Ireland's no-regret options are demand reduction (e.g. through energy efficiency and reduced consumption), electrification (e.g. electric vehicles and heat pumps), deployment of market-ready renewables (e.g. wind energy and solar photovoltaics) and low-carbon heating options (e.g. district heating); Irelands future choices include hydrogen, carbon capture and storage, nuclear energy and electro-fuels. Renewable energy can increasingly provide our future energy needs but will need to be complemented with carbon dioxide removals to achieve a net zero energy system in hard-to-abate sectors.'

The Climate Change Advisory Council Electricity Sectoral Review 2024

The Climate Advisory Council published its annual review in May 2024, it outlines detailed observations and recommendations for the Electricity sector in Ireland. This review emphasises the urgent need for Ireland to accelerate its transition to renewable energy to meet its 2030 electricity capacity targes and adhere to sectoral emissions ceilings.

The Climate Change Advisory Council states:

"Ireland needs to reduce and ultimately prevent emissions of greenhouse gases. to stay within the agreed carbon budget, the Electricity sector needs to achieve the largest reduction in sectoral emissions of all sectors: a 75% decrease by 2030 compared with 2018."

Key observations in relation to Renewable Electricity are outlined below:

- Renewables accounted for 41% of electricity demand in 2023, up from 39% in 2022.

- By the end of 2023, the total renewable grid capacity in Ireland was 5.7 GW, with the majority (4.7 GW) from onshore wind turbine installations.
- In 2023, only onshore wind (0.2 GW) generation was connected. This is significantly below the annual average increase of 1.6 GW of onshore renewables required to meet 2030 capacity targets.
- In 2023, 0.5 GW of wind projects received planning permission; however, no onshore wind projects were awarded permission before September. Appeals and judicial reviews, including for all of An Bord Pleanála's (the Board) approved projects, continue to delay the development of projects.

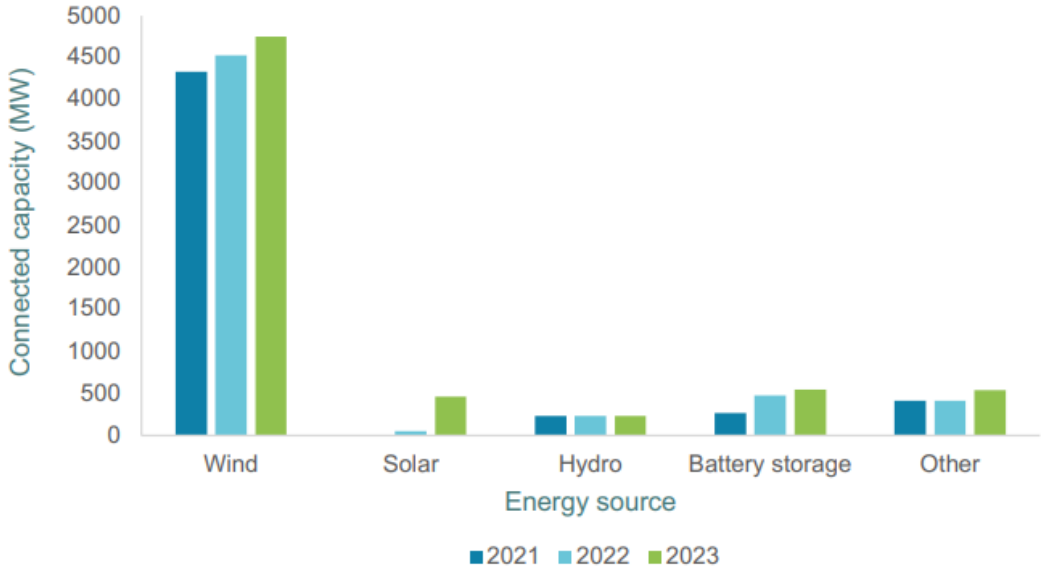

Figure 2-4 Renewable energy capacity and storage connected to the grid in Ireland, 2021-2023

2.5 Planning Policy Context

2.5.1 Introduction

This section of the EIAR provides the strategic planning context of the Proposed Project. As is examined below, the Proposed Project is in line with national, regional and local policies, frameworks, guidelines and plans. This section has been broken down to the following sections:

- National Policy Context
- Regional Policy Context
- Local Policy Context
- Other Relevant Material Considerations

As a renewable energy project, the Proposed Project is consistent with the overall national policy objectives to increase penetration and deployment of renewable energy resources and has been designed in the context of the relevant wind energy and other guidelines. The specific compliance with the National, Regional and Local/County Development Plan provisions is dealt with in detail in the sections below.

2.5.2 National Planning Policy

The Planning and Development Act 2024

The Planning and Development Act 2024 (the new Act) was signed into law by the President on the 17th of October 2024, after passing in both Houses of the Oireachtas. At the time of lodgement of this

planning application, the current Planning and Development Act 2000 (as amended) (the Act) remains in place until the new Act is commenced by Ministerial Orders, with the Government indicating that this will be done on a phased basis.

National Planning Framework: Project Ireland 2040

The National Planning Framework (NPF), published in February of 2018, forms the top tier of the national planning policy structure which establishes the policy context for the Regional Spatial and Economic Strategies (RSES) and local level development plans. In an effort to move away from developer-led system to one informed by the needs and requirements of society up to 2040, a number of objectives and policies have been put in place in the NPF in order for the country to grow and develop in a sustainable manner, including:

- 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 be roughly 5.7 million by 2040. This population growth will place further demand on both the built and natural environment. 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."*

A key focus throughout the NPF is the fostering of a transition toward a low carbon, climate-resilient society. In this regard, one of the stated key elements of the NPF is an Ireland which has a secure and sustainable renewable energy supply and facilitates the ability to diversify and adapt to new energy technologies. Key features identified in the NPF to facilitate the transition towards a low carbon energy future include:

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

Relevant to the Proposed Project, the **National Strategic Outcome 8** (*Transition to Sustainable Energy)*, notes that in creating Ireland's future energy landscape, new energy systems and transmission grids will be necessary to enable a more distributed energy generation which connects established and emerging energy sources, i.e. renewables, to major sources of demand. The successful transition to a low-carbon power system will depend on the pillars of 1) *Sustainability*, 2) *Security of supply* and 3) *Competitiveness*. A common theme underpinning these pillars is the need for a fit-for-purpose transmission and distribution energy network. Specifically, the NPF states that reinforcement of the distribution and transmission network to facilitate planned growth and distribution of a more renewables focused source of energy across the major demand centres, e.g. the functional purpose of the extant grid connection.

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

- **NPO 21:** Enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through the diversification of the rural economy

into new sectors and services, including ICT-based industries and those addressing climate change and sustainability.

- **NPO 54:** Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.

Also relevant to the Proposed Project, Ireland's national energy policy under **Objective 55** aims 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*'. The NPF aims to ensure that decisions that are made today meet our future needs in a sustainable manner.

> *"The manner in which we plan is important for the sustainability of our environment. Our planning system has influence across a wide range of sectors, both directly and indirectly and interacts with many common issues related to effective environmental management, including water services, landscape, flood risk planning, protection of designated sites and species, coastal and marine management, climate mitigation and adaptation, and land use change."*

An overarching objective of the NPF is to foster a transition toward a low carbon, climate-resilient society, which reflects the policy ethos established at the European level of governance (e.g. climate change and renewable energy targets). In this regard, one of the key themes of the NPF is the realisation of an Ireland which has a secure and sustainable renewable energy supply and the ability to diversify and adapt to new energy technologies. The NPF references the national Climate Policy Position which established the fundamental objective of achieving transition to a competitive, low carbon, climate resilient and environmentally sustainable economy by 2050. The NPF emphasises that rural areas have a strong role to play in securing a sustainable renewable energy supply for the country and acknowledges that *"rural areas have significantly contributed to the energy needs of the country and continue to do so"*. In this regard, the NPF states:

> *"In meeting the challenge of transitioning to a low carbon economy, the location of future national renewable energy generation will, for the most part, need to be accommodated on large tracts of land that are located in a rural setting, while also continuing to protect the integrity of the environment".*

The NPF acknowledges that GHG emissions from the energy sector must be reduced by at least 80% by 2050 when compared to 1990 levels while ensuring a secure supply of energy exists. New energy systems and the maintenance / safeguarding of existing grid assets will be necessary for a more distributed, renewables focused energy system required to harness Ireland's considerable indigenous energy sources and *"connect the richest sources of that energy to the major sources of demand"*.

In regard to the above, it is clear that the provision of new renewable energy generation is in line with the aims and objectives of the NPF which seeks to transition to a low carbon economy.

Draft Revised National Planning Framework

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

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

Table 9.1 of the Draft Revised National Planning Framework sets regional renewable energy capacity allocations for wind and solar energy. This was one of the key actions for 2024 under the Climate Action

Plan 2024. The Southern Region, in which the Proposed Project is located, is allocated an additional 978MW of wind energy. Under NPO 75, the Southern Regional Assembly will be required to plan how and where to deliver the required capacity by identifying capacity allocations for each Local Authority in its area. Kilkenny County Council (KCC) will then be required to plan for the delivery of the energy capacity target that they have been allocated, under NPO 76.

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

National Development Plan 2021- 2030

The National Development Plan 2021 – 2030 (NDP) was published on the 4th October 2021 and sets out the major public investment projects identified by Government which are to play a significant role in addressing the opportunities and challenges faced by Ireland over the coming years such as housing, health, population growth, and most relevant to the subject development, climate change. Reflecting on the recent publication of the IPCC's 6th Assessment Report, the NDP notes that the Irish Government is fully committed to 'playing its part' to ensure that the worst climate change damage can be avoided, e.g. significant reductions in CO_2 and other GHG emissions as assisted by the achievement of both European and national renewable energy targets. Specifically, the NDP states that,

> *"The next 10 years are critical if we are to address the climate crisis and ensure a safe and bright future for the planet, and all of us on it.*
>
> *The investment priorities included in this chapter [Ch. 13] must be delivered to meet the targets set out in the current and future Climate Action Plans, and to achieve our climate objectives. The investment priorities represent a decisive shift towards the achievement of a decarbonised society, demonstrating the Government's unequivocal commitment to securing a carbon neutral future."*

Notwithstanding this, the NDP acknowledges that it is not its role to set out a specific blueprint for the achievement of Ireland's climate targets; but as noted above, facilitate capital investment allocations for the climate and environmental strategic priorities.

One of the NDP's strategic climate priorities is the need for low-carbon, resilient electricity systems; specifically, the plan commits to increasing the share of renewable electricity up to 80% by 2030. This is characterised by the NDP as an '*unprecedented commitment to the decarbonisation of electricity supplies*' which, is certainly ambitious and an explicit driver for the deployment of new renewable generators e.g. the Proposed Project and the safeguarding / maintenance of existing assets. It is noted that the reliability of electricity supplies will also be strengthened through investment in the electricity transmission and distribution grid. The focus of investment in regulated network infrastructure is to contribute to a long-term, sustainable and competitive energy future for Ireland.

2.5.2.2 Project Compliance with National Policy

With regard to the above, it is considered that the Proposed Project is in line with and supported by the National Planning Framework and the National Development Plan.

The National Planning Framework projects a population increase of 1 million people by 2040 and therefore recognises the strain and demand this will put on Irelands energy system. In order to ensure Ireland delivers on our renewable energy and carbon emission reduction targets, the NPF recognises the need for increased renewable energy onto the national grid. The Proposed Project is directly supported by National Planning Objective 21, 54, and 55.

The National Development Plan 2021 - 2030 is clear in its priority to reach a low-carbon, climate resilient society over the lifetime of the plan. The Proposed Project, if permitted, will provide clean, renewable electricity to the national grid, furthering development objectives of the NDP, namely the target to increase the share of renewable electricity up to 80% by 2030.

This shift from fossil fuels is dependent upon schemes such as the one proposed to generate renewable energy. Given the projected population increase, it is considered that if the share of renewable energy onto the grid is not increased, Ireland will fail to reach the National and International targets on emission reductions. The addition of 7 no. wind turbines, with an estimated electricity generation capacity of 49MW, will contribute to Ireland's national targets and support the country in meeting its renewable energy and carbon emission reduction goals at the EU level.

2.5.3 Regional Policy

Southern Regional Assembly Regional Spatial & Economic Strategy

The Southern Regional Assembly (SRA) was established in 2015, the Regional Spatial and Economic Strategy (RSES) for the Southern Region (Carlow, Clare, Cork, Kerry, Kilkenny, Limerick, Tipperary, Waterford and Wexford) came into effect on 31st January 2020. The RSES provides a long-term, strategic development framework for the future physical, economic and social development of the Southern Region. The RSES seeks to achieve balanced regional development and full implementation of Project Ireland 2040 – the National Planning Framework.

Adopted on the 31st of January 2020, the principal statutory purpose of the RSES is to support the implementation of the Project Ireland 2040 NPF and NDP and the economic policies and objectives of the Government. The RSES aims to build on the region's strengths and potential to become a more prosperous, sustainable, climate resilient and attractive region for the benefit of all its people up to 2040 and beyond.

The RSES notes that planning policy and objectives must incorporate resilience and adaptability to ensure that the Region are agile and responsive to change. At present, Irish per capita Green House Gas (GHG) emissions are among the highest in Europe and the Government has identified '*Climate Change as the most important long-term challenge facing Ireland' with a stated commitment to 'the transformation required to achieve a low carbon resilient future'*. Transition to a low carbon energy future will require a wide range of policy responses across industry and public sectors, including electricity.

To achieve national and EU targets in the context of the electricity sector, the RSES notes that further investment is required to develop alternative renewable energies with greater interconnection to energy resources. This key enabling action is captured under Strategic Aim 8 which sets out the need to "*safeguard and enhance the environment through sustainable development, prioritising action on climate change across the region, driving the transition to a low carbon and climate resilient society*." Both the NPF and RSES emphasise, however, that the planning process is well placed to implement and integrate climate change objectives.

- **RPO 9 (Holistic Approach to Delivering Infrastructure)**: It is an objective to ensure investment and delivery of comprehensive infrastructure packages to meet growth targets that prioritise the delivery of compact growth and sustainable mobility as per the NPF objectives including for renewable energy and climate change adaption.

The RSES sets out a number of Regional Policy Objectives (RPOs) designed to facilitate greater integration of renewables into the national grid. The RSES notes that there is significant potential to use renewable energy across the Region to achieve climate change emission reduction targets. As such, the RSES supports renewable industries such as the Proposed Project.

- **RPO 50 (Diversification)** It is an objective to further develop a diverse base of smart economic specialisms across the rural Region, including innovation and diversification in (among other things) renewable energy as a dynamic driver for the rural economy.

- **RPO 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 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 100 (Indigenous Renewable Energy Production and Grid Injection)**: It is an objective to support the integration of indigenous renewable energy production and grid injection.

The RSES also acknowledges the need to develop a strong grid to support the integration of renewable energy on to the national electricity grid. The RSES sets out a number of infrastructural RPOs, relevant to the Proposed Project which indicate that the Region is open to, and ready to invest in, renewable energy generation:

2.5.3.2 Project Compliance with Regional Policy

The RSES supports the Southern Region as a Carbon Neutral Energy Region. At present, the RSES notes that the Region has more renewable energy generation than demand which indicates a strategic role for the region's energy assets in national energy generation and transmission with projected increases in population and economic growth, the demand for energy is set to increase in the coming years. It is considered that the provision of the Proposed Project would facilitate this just transition and is particularly in line with the RPO as outlined above. In the region, a noticeable trend has emerged to recognise and take advantage of emerging opportunities related to the shift towards a decarbonised economy, particularly in the realm of renewable energy generation and therefore the Proposed Project is considered to be in line with Regional Policy.

2.5.4 Local Policy Context

Kilkenny City and County Development Plan 2021- 2027

The Kilkenny City and County Development Plan 2021-2027 (KCCDP) came into effect on the 15th of October 2021. The KCCDP incorporates the aims, objectives, policies and guidelines to provide for the proper planning and sustainable development of County Kilkenny.

Draft Ministerial Direction

On the 15th October 2021, the Minister of State at the Department of the Housing, Local Government and Heritage, consequent to a recommendation made to him by the Office of the Planning Regulator under Section 31AM(8) of the Act notified KCC of his intention to issue a Direction to the KCCDP. It states that:

"In accordance with Section 31(4) of the Planning and Development Act 2000, those parts of the Kilkenny City and County Development Plan 2021 – 2027 Plan referred to in the notice shall be taken not to have come into effect, been made or amended; namely;

Chapter 11 Renewable Energy: Section 11.4 Kilkenny Targets, Section 11.5.1 Current status and targets and Figure 11.4 Wind Strategy areas.

The Planning Authority is awaiting a further direction from the Minister in this regard. Consequently, the Renewable Energy policies and Wind Strategy areas as previously set out in the Kilkenny City and County Development Plan 2021- 2027, cannot be taken into account at this time."

The reason for the draft direction is as follows:

1. The Development Plan as made is inconsistent with Ministerial Guidelines issued under Section 28 of the Act, specifically item 2 of the Specific Planning Policy Requirement contained in the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (July 2017), which sets out the requirement for the Planning Authority to comply with the aforementioned Specific Planning Policy Requirement under section 28(1C). In particular, the Development Plan fails to identify renewable energy targets (in megawatts) which Kilkenny can contribute in delivering its share of overall government targets on renewable energy and climate change mitigation over the plan period.
2. The Development Plan contains conflicting objectives on renewable energy sustainable development and climate action such that the adopted Plan, without providing sufficient compensatory measures, significantly reduced the extent of the areas indicated as 'acceptable in principle' that were identified in the draft Development Plan as being necessary to achieve the **target of 201MW required to ensure that 100% of electricity demand for Kilkenny is met from renewable sources by 2030** and to ensure consistency with the Climate Action Plan.

As the previous County Development Plan has since expired and the parts named above shall be taken not to have come in effect, the Wind Energy Strategy Areas and its associated policies cannot be taken into account. At the time of writing, the Proposed Project has been assessed in line with the adopted relevant policies of the KCCDP, as there has been no update on the ministerial direction.

Relevant Policies and Objectives

The KCCDP provides for the development of indigenous energy resources, with an emphasis on renewable energy supplies. The Council acknowledges the importance of renewable energy in reducing anthropogenic GHG emissions and the contribution of renewable energy in achieving national and EU target net zero GHG emissions by 2050.

Climate change mitigation and adaptation objectives have been incorporated into the policies of the KCCDP. This is to ensure that climate change has been consistently integrated into the policy themes addressed by the KCCDP. The strategic aim for climate change as set out in Chapter 2 of the KCCDP is as follows:

"Strategic Aim: To provide a policy framework with objectives and actions in this City and County Development Plan to facilitate the transition to a low carbon and climate resilient County with an emphasis on reduction in energy demand and greenhouse gas emissions, through a combination of effective mitigation and adaptation responses to climate change."

The KCCDP has aligned its policy and objectives with the Strategic Objectives of the NPF and the RSES to maintain and improve the County's attraction in order to maximise investment opportunities. The KCCDP sets out a number of Strategic Objectives relating to Climate Action including the following:

- ***2B*** *To support the implementation of the National Climate Action Plan and the National Climate Action Charter for Local Authorities, and to facilitate measures which seek to reduce emissions of greenhouse gases by embedding appropriate policies within the Development Plan.*

- ***2C*** *To promote, support and direct effective climate action policies and objectives that seek to improve climate outcomes across the settlement areas and communities of County Kilkenny helping to successfully contribute and deliver on the obligations of the State to transition to low carbon and climate resilient society.*

- ***2E*** *To ensure that the Development Plan transposes, supports and implements strategic objectives of the National Planning Framework and the Southern Regional Spatial and Economic Strategy to create an enabling local development framework that: (a) promotes and integrates important climate considerations in local development and the assessment of planning applications and (b) supports the practical implementation of national climate policy and targets to assist in the delivery of the national transition objective.*

- ***2G*** *To reduce energy related CO2 emissions of Kilkenny County Council.*

- ***2H*** *To achieve the commitment under the European Climate Alliance to the reduction of greenhouse gas emissions by 10 percent every 5 years.*

- ***11B*** *To identify and designate a Decarbonation Zone (DZ) in the Council's Climate Action Plan for a spatial area in which a range of climate mitigation, adaptation and biodiversity measures are developed to address local low carbon energy, greenhouse gas emissions and climate needs to contribute to national climate action.*

With regard to the Renewable Energy, the KCCDP acknowledges that Ireland and Kilkenny have excellent renewable energy (RE) resources, which will be a critical and growing component of Irish energy supply to 2020 and beyond. The strategic aim for renewable energy, set out in chapter 11 of the KCCDP sets a clear, ambitious target:

> *"Strategic Aim: To generate 100% of electricity demand for the County through renewables by 2030 by promoting and facilitating all forms of renewable energies and energy efficiency improvements in a sustainable manner as a response to climate change in suitable locations having due regard to natural and built heritage, biodiversity and residential amenities."*

The Renewable Energy chapter (Chapter 11) sets out the policy context for all renewables and includes an analysis of each type of renewable energy within the county, covering three aspects as follows:

- An analysis of the resource potential,
- An outline of development management guidelines including potential impacts and
- Objectives and policies for their future development.

In this regard, it is an objective of the KCCDP:

> *"**11A:** To support and facilitate the provision of energy in accordance with Ireland's transition to a low carbon energy future by means of the maintenance and upgrading of electricity and gas network grid infrastructure and by integrating renewable energy sources and ensuring our national and regional energy system remains safe, secure and ready to meet increased demand as the regional economy grows over the period of the plan."*

It is estimated that, by 2030, County Kilkenny will use 633 Gigawatt hours (Gwh) of electricity, as stated in the KCCDP. If County Kilkenny is to reach its strategic aim of generating 100% of their electricity demand, they will need to install 253MW of energy or "2.09% of the Country's 12.1 GW combined onshore and offshore renewable energy target" as stated in the KCCDP. The Proposed Project will contribute towards achieving this important target by supplying 49MW of energy to the national electricity grid or 19% of the 253MW needed.

Development Management Guidance

Regarding wind energy Development Management Guidance, the KCCDP states that *"all planning applications for wind energy developments shall be assessed against the DEHLG's Wind Energy Development Guidelines, 2006, (and any subsequent update of these guidelines) and the County Council's Wind Strategy"*.

In the absence of KCC's Wind Energy Strategy due to the draft ministerial direction on the KCCDP, it is noted that the design and layout of the Proposed Wind Farm follows the recommendations and guidelines set out in the Guidelines published by the DEHLG in 2006, and the *'Best Practice Guidelines for the Irish Wind Energy Industry'* published by the Irish Wind Energy Association in 2012. The design and layout of the Proposed Wind Farm also has regard to the draft Guidelines published by the DHPLG in 2019. Should the draft Guidelines be adopted in advance of a planning decision being made on Briskalagh Renewable Energy Development, the Proposed Project will be capable of achieving the requirements of the draft Guidelines as currently proposed.

Kilkenny Wind Energy Development Strategy 2021

The Wind Energy Development Strategy (WEDS) for KCC forms Appendix K of the KCCDP. The WEDS provides a clear framework for the Council's objectives and methodology for identifying suitable locations for wind energy development in the county. By considering the relevant policy context, this strategy aims to guide and streamline the process of wind energy development in a way that aligns with the overall goals and priorities set by the Council. This approach ensures that sustainable and well-planned wind energy projects can be successfully implemented in the county. The key objectives of the WEDS are set out below:

> *"The key objectives of this Wind Strategy are as follows:*
>
> - *Recognise the importance of wind energy as a renewable energy source and ensure the security of energy supply by supporting, in principle and at appropriate scales and locations, the development of wind energy resources in the county.*
> - *Promote the development of wind energy and other renewable energy sources in the county to meet national renewable energy targets (supplying a minimum of 100% of electricity consumption from renewable sources by 2030).*
> - *Enable Kilkenny to generate the equivalent of 100% of its electricity needs from renewable energy.*
> - *Identify strategic areas in the county for wind energy development.*
> - *Provide specific criteria for wind energy development that the planning authority will take into account when considering any wind energy or related proposals.*
> - *Investigate the potential for relatively small-scale wind energy developments within urban and industrial areas, and for small community-based proposals outside the strategic areas."*

Chapter 5 of the WEDS characterises the county into 3 different policy areas aimed at facilitating wind farm growth. These policy areas are based on a sieve mapping approach to identify suitable areas for wind energy developments on a number of characteristics. The Strategy areas and descriptions are set out in **Table 2-3** below.

Table 2-3 Kilkenny County Council Wind Energy Strategy Area Designations

Kilkenny County Council – Wind Energy Strategy Areas	
Strategy Areas	Description
Acceptable in Principle -	*This is the preferred area for wind energy development, characterised by high wind speeds, and no significant conflict with environmental designations or sensitivities.*

Open for Consideration -	*This area is characterised by no significant conflict with environmental designations or sensitivities.*
Not Normally Permissible -	*This area is considered to be generally unsuitable for wind farm development. Individual turbines will be considered on a case-by-case basis.*

The Proposed Wind Farm turbine locations are all located within the policy areas designated as 'Acceptable in Principle' (AIP) and 'Open for Consideration' (OTC) as shown in **Figure 2-5**.

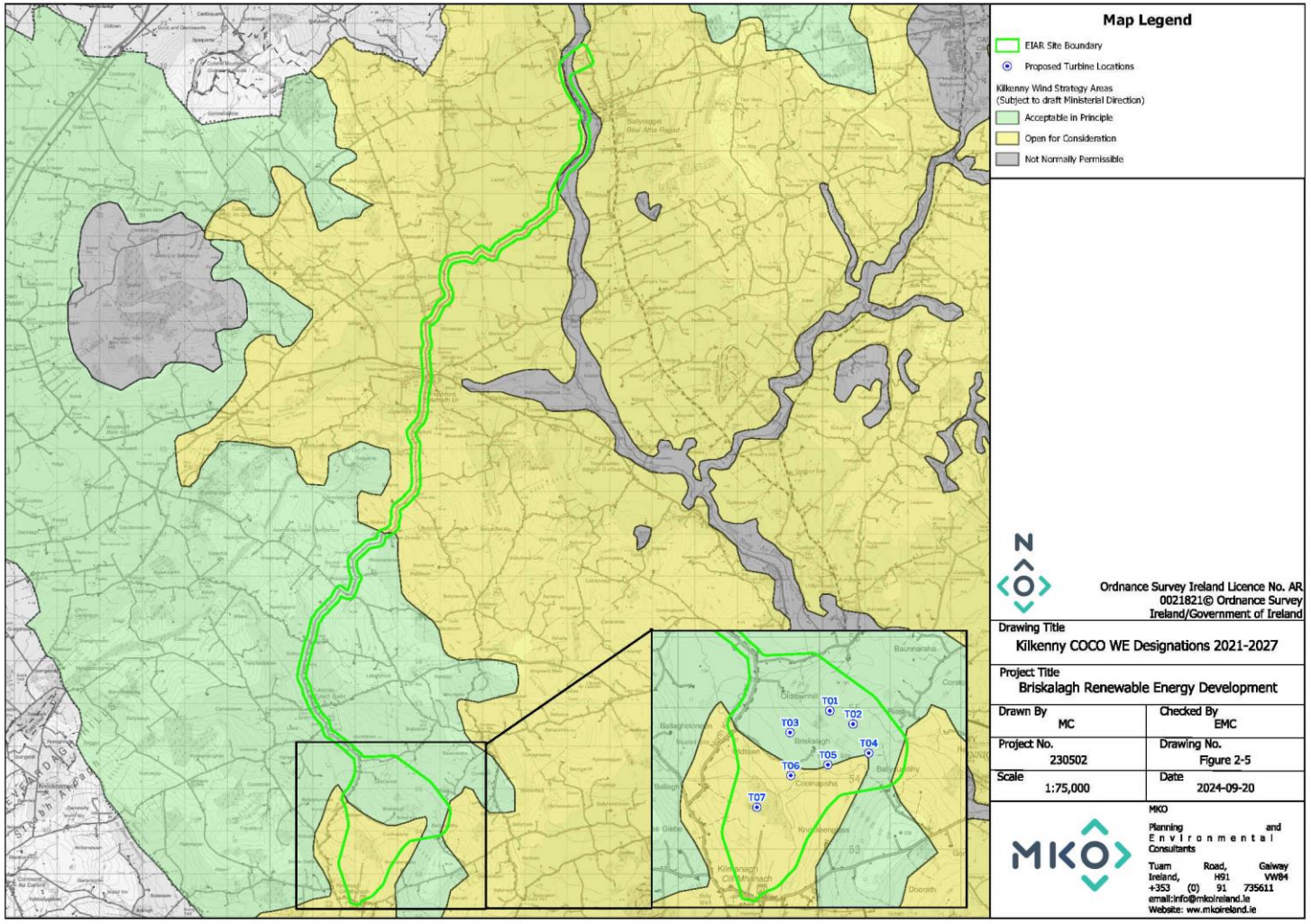

Figure 2-5 Kilkenny County Council Local Authority Wind Strategy Areas Map - Proposed Briskalagh Wind Farm Location

These designations for the Proposed Wind Farm are favourable for wind energy development, given the fact there is *"no significant conflict with environmental designations or sensitivities"* identified within these designated policy areas.

The WEDS also sets out four different categories of wind energy developments depending on their scale as follows:

a) Individual wind turbines

b) Auto producer

c) Small scale wind developments/Community Schemes (Compliant with the REDII Directive definition of community)

d) Large scale wind developments

The WEDS states the following in relation to 'large scale wind energy developments', which are classified as wind energy projects above 5MW:

> *"Large-scale wind energy developments will, in usual circumstances, only be considered in 'Acceptable in principle' areas. The rationale behind this policy is to minimise the visual impacts of such large-scale developments, in addition to effects on the environment of County Kilkenny as a whole, as well as to facilitate appropriate grid connections. These will be assessed in accordance with the Wind Energy Development Guidelines."*

This policy effectively limits all wind energy developments (bar small installations below 5MW) to the *'Acceptable in Principle'* areas. However, due to the absence of a local Wind Energy Strategy with a spatial dimension for Kilkenny, this policy cannot be applied to the Proposed Wind Farm, and so in this scenario there cannot be any contravention of this policy.

Furthermore, it was highlighted by the OPR in their submission to the draft Development Plan, that no national policy basis exists for the restrictive policy relating to large scale wind energy developments and that its inclusion in the KCCDP is unjustified, as set out by the OPR below:

> *"It is also noted that in Table 11.3 'Wind Energy Strategy Areas/ Policy Approach' large scale wind farm development will only be considered in areas designated as 'acceptable in principle', and that wind energy development in areas 'open for consideration' is subject to restrictions under Section 11.5.2. This means that the amendments to change geographical areas designated in the draft Plan as 'acceptable in principle' to 'open for consideration'* ***unreasonably and substantially restrict the opportunity for County Kilkenny to contribute to the national targets for renewable energy set out in the Climate Action Plan 2019.***
>
> *Furthermore the restrictions in relation to the scale of wind farms under section 11.5.2* ***have no national policy basis for such wind development****. This may have implications for the implementation of your plan, including the decisions of An Bord Pleanála in the context of Section 37(2)(b) of the Act"* (emphasis added).

In the absence of a local Wind Energy Strategy for Kilkenny, it is considered that there is sufficient policy direction at national, regional and local level to enable KCC to assess the Proposed Project on its merits. Despite the absence of a local Wind Energy Strategy for Kilkenny, the provision of the Proposed Project remains supported by local climate change and renewable energy policy within the KCCDP, as it recognises the role that indigenous renewable energy has on increasing Kilkenny's energy sustainability and security by reducing dependence on imported fossil fuels.

In similar circumstances in the absence of specific local policy, Planning Authorities have found that there is a comprehensive range of guidance and policy objectives at a national and regional level generally in relation to windfarm developments, and while certain aspects of the KCCDP are not in effect, this does not imply that there is a complete vacuum or lacuna in policy which precludes the Planning Authority

from determining the application before it in accordance with the proper planning and sustainable development of the area.[15]

A full breakdown of the compliance of the Proposed Project against relevant Policies and Objectives and Development Management Guidance of the KCCDP is set out in Section 6.4 of the Planning Report which accompanies this planning application to KCC.

2.5.4.2 Compliance with Local Policy Objectives

The design and layout of the Proposed Project follows the recommendations and guidelines set out in the Guidelines and the draft Guidelines (Department of the Environment, Heritage and Local Government, 2019) and the IWEA Guidelines (Irish Wind Energy Association, 2012.)

As set out in detail in Chapter 3 of the EIAR, a detailed environmental constraints assessment was conducted which led to the siting of turbines wholly within the AIP and OTC areas. The inclusion of the constraints on a map of the study area allowed for a viable area to be identified. An initial turbine layout was then developed to take account of all the constraints and their associated buffer zones and the separation distance required between the turbines. Following the mapping of all known constraints, detailed site investigations were carried out by the project team. Where specific areas were deemed as being unsuitable for the siting of turbines or roads, etc., alternative locations were proposed and assessed, taking into account the areas that were already ruled out of consideration. The turbine layout for the Proposed Wind Farm has also been informed by the results of noise, landscape and visual and shadow flicker assessments as they became available.

Locally, despite the absence of a local Wind Energy Strategy for Kilkenny the KCCDP is supportive of renewable energy developments, such as the Proposed Project, as it sets out the need for Kilkenny to transition to a low carbon and climate resilient County with a focus on renewable energy to increase the County's energy sustainability and security. Specifically a strategic aim of the KCCDP is to generate 100% of the County's electricity demand through renewable energy by 2030, the Proposed Project will support the KCCDP in this aim.

In spite of the absence of a local Wind Energy Strategy for Kilkenny as discussed in Section 2.5.4 above, it is considered that due to the comprehensive suite of international, national, regional and local policy support for wind energy, the principle of the Proposed Project at this location is acceptable.

2.5.5 Other Relevant Onshore Wind Energy Planning Policy Publications

The following relevant onshore wind planning policy publications and/or best practice guidelines were considered in the design and assessment of the Proposed Project.

The Guidelines

In June 2006, the then Department of Environment, Heritage and Local Government (DoEHLG) published the Guidelines under Section 28 of the Act. The aim of the Guidelines was to assist the proper planning of wind power projects in appropriate locations around Ireland. The Guidelines also highlight general considerations in the assessment of all planning applications for wind energy. They set out advice to planning authorities on planning for wind energy through the development plan process and in determining applications for planning permission. They contain guidelines to ensure consistency of approach throughout the country in the identification of suitable locations for wind energy development.

Each wind project has its own characteristics and defining features, and it is therefore impossible to write specifications for universal use. The Guidelines should be applied practically and do not replace existing national energy, environmental and planning policy. While the Guidelines remain the relevant guidelines

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in place, at the time of lodgement, decision makers (Planning Authorities and the Board) are not bound to their provisions and they can (and do) consider updated standards/requirements/specifications in assessing impacts and the proper planning and sustainable development of the area.

The draft Guidelines

The Department of Housing, Planning and Local Government (DHPLG) published the draft Guidelines in December 2019. A consultation process in relation to the draft Guidelines concluded on the 19th of February 2020. A further review of the draft Guidelines is currently underway by the Department of Housing, Local Government and Heritage (DHLGH) and the Department of Environment, Climate and Communications (DECC)particularly in relation to noise limits. Since the publication of the draft Guidelines, there have been significant changes in national policy regarding renewable energy targets, giving further impetus to the importance of the further review. The draft Guidelines set out that that the proper planning and sustainable development of areas and regions must be taken into account when local authorities prepare their development plans and assess planning applications, irrespective of the significant role renewable energy has to play in tackling climate change.

The draft Guidelines note that potential impacts of wind energy development proposals on the landscape, including the natural and built environment, must be considered along with the legitimate concerns of local communities. With this in mind, and in line with the previously stated "*preferred draft approach",* the draft Guidelines primarily focus on addressing a number of key aspects including, but not limited to:

- Acceptable noise thresholds and monitoring frameworks;
- Visual amenity setback;
- Control of shadow flicker;
- Compliance with Community consultation and dividend requirements, as included within the obligatory Community Report; and
- Consideration of the siting, route and design of the proposed grid connection as part of the whole project

The design of the Proposed Project has taken account of the *"preferred draft approach"* as articulated by the Department in June 2017, and accordingly, has been developed with the provisions of the draft Guidelines in mind (for example in relation to 4 times turbine tip height set back distance from third party sensitive receptors) and the inclusion of a standalone community report.

As stated above, the submission period for the draft Guidelines closed in February 2020. Under the consultation, concerns were raised in relation to a number of themes these include but are not limited to noise, visual amenity, set back and shadow flicker. With regards to noise, a number of the received submissions noted that the provisions put forward in the draft Guidelines were unworkable and could impact the viability of the entire onshore wind sector. In relation to set back distances there was strong criticism with regards to this distance being measured to the curtilage of a property due to this measurement being ambiguous and difficult to implement. Furthermore, questions were raised surrounding the strict measures proposed for shadow flicker; the draft Guidelines put forward the provision that '*there will be no shadow flicker at any existing nearby dwelling or other relevant existing affected sensitive property' which didn't allow time for the safe shutting down of turbines.*

At time of writing the draft Guidelines are not yet finalised and have not been adopted. The relevant wind energy guidelines for the purposes of Section 28 of the Act, as amended, remain those published in 2006, the Guidelines. Notwithstanding this, however, due to the timelines associated with the planning process for renewable energy projects it is possible that an updated version of the draft Guidelines may be finalised during the consideration period for the current planning application for the Proposed Project. To this end, on the basis of the details available from the draft Guidelines it is anticipated that the Proposed Project will be capable of adhering to the relevant noise and shadow flicker standards. While the final Guidelines have not yet been published it should be noted that Noise and Shadow Flicker are entirely controllable and are discussed further in Chapter 12 and Chapter 5, respectively, and the Proposed Project maintains a four times tip height set back between turbines and sensitive receptors which is currently the recognised standard for visual amenity purposes, as outlined in the draft Guidelines. Furthermore, detailed community consultations have been carried out (refer to **Appendix 2-**

1) and detail of the Proposed Grid Connection for the Proposed Project has been provided and assessed as part of this EIAR.

IWEA Best Practice Guidelines for the Irish Wind Energy Industry 2012

The Irish Wind Energy Association (IWEA) (now Wind Energy Ireland) published updated *Wind Energy Best Practice Guidelines* for the Irish Wind Industry in 2012. The guidelines aim to encourage and define best practice development in the wind energy industry, acting as a reference document and guide to the main issues relating to wind energy developments. The purpose of the guidelines is to encourage responsible and sensitive wind energy development, which takes into consideration the concerns of local communities, planners, and other interested groups. The guidelines outline the main aspects of wind energy development with emphasis on responsible and sustainable design and environmental practices, on aspects of development which affect external stakeholders, and on good community engagement practices. In approaching the development of IWEA's guidelines the aim was to be complementary to the Department of the Environment Heritage and Local Government's 'Wind Energy Development Guidelines' (2006).

IWEA Best Practice Principles in Community Engagement and Community Commitment 2013

IWEA extended its guidance with the publication of this Best Practice in Community Engagement and Commitment. IWEA and its members support the provision of financial contributions by wind farm operators to local communities and have sought to formulate best practice principles for the provision of a community commitment. The document sets out IWEA's best practice principles for delivering extended benefits to local communities for wind farm developments of 5 Megawatts (MW) or above. Best Practice Principles of community engagement when planning the engagement strategy and preparing associated literature are also outlined in the document. The aim of these guidelines is to ensure that the views of local communities are taken into account at all stages of a development and that local communities can share in the benefits.

DCCAE Code of Practice for Wind Energy Development Ireland – Guidelines for Community Engagement 2016

In December 2016, the (then) Department of Communications, Climate Action and Environment (DCCAE) issued a Code of Practice for wind energy development in relation to community engagement. The Code of Good Practice is intended to ensure that wind energy development in Ireland is undertaken in adherence with the best industry practices, and with the full engagement of local communities. 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 guidelines advise that ignoring or poorly managing community concerns can have long-term negative impacts on a community's economic, environmental or social situation. Not involving communities in the project development process has the potential to impose costly time and financial delays for projects or prevent the realisation of projects in their entirety.

Further details on the community engagement that has been undertaken as part of the Proposed Project are presented below. A Community Engagement Report has been prepared by MKO and in included as **Appendix 2-1** to this chapter. This report outlines the steps taken by the Applicant to communicate effectively with the local community in respect of the Proposed Project.

Department Circular PL5/2017

On the 3rd of August 2017, the (then) Department of Housing, Planning and Local Government issued Circular PL5/2017 to provide an update on the review of the wind energy and renewable policies in development plans, and the advice contained within a previous Departmental Circular PL20-13. Circular PL20-13 advised that local authorities should defer amending their existing Development Plan policies in relation to wind energy and renewable energy generally as part of either the normal cyclical six-yearly review or plan variation processes and should instead operate their existing development plan policies

and objectives until the completion of a focused review of the Guidelines. The new circular (PL05/2017) reconfirms that this continues to be the advice of the Department.

The Circular also set out the four key aspects of a *preferred draft approach* being developed to address the key aspects of the review of the Guidelines as follows:

- The application of a more stringent noise limit, consistent with World Health Organisation noise standards, in tandem with a new robust noise monitoring regime to ensure compliance with noise standards;
- A visual amenity setback of 4 times the turbine height between a wind turbine and the nearest residential property, subject to a mandatory minimum distance of 500 metres between a wind turbine and the nearest residential property;
- The elimination of shadow flicker; and
- The introduction of new obligations in relation to engagement with local communities by wind farm developers along with the provision of community benefit measures.

Commission for Regulation of Utilities: Grid Connection Policy

The Commission for Regulation of Utilities (CRU) (previously the Commission for Energy Regulation (CER)) launched a new grid connection policy in March 2018 for renewable and other generators, known as ECP-1, which seeks 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 allow those projects to have an opportunity to connect to the network, along with laying the foundations for future, more regular batches for connection. August 2018 saw the applicants for new connection capacity under ECP-1 published. ECP-2 was launched in June of 2020, August 2018 saw the applicants for new connection capacity under ECP-1 published. ECP-2 was launched in June of 2020, which set policy for at least three annual batches of connection offers (ECP 2.1, ECP-2.2, and ECP-2.3). On 4th April 2023 the CRU published its Decision on ECP-2.4, confirming a fourth batch under the ECP-2 policy. The first three ECP-2 application windows (2.1 -2.3) opened for the month of September each year. The application window for the fourth annual batch (ECP-2.4) is open from 1st October - 30th November 2023.The enduring connection policy regime replaces the previous 'Gate' system of grid connection applications. The grid connection application window under ECP-1 was the first time since 2007 that certain renewable energy projects including wind farms had an opportunity to secure a new grid connection offer.

The design of the Proposed Project grid connection has taken account of the *"preferred draft approach"* and accordingly, has been developed with the provisions of the draft Guidelines in mind. This grid connection policy will allow for the Proposed Project Grid Connection, once it is permitted, to connect to the electricity networks under the enduring connection policy regime.

Renewable Energy Support Scheme

The CAP24 is the Government's plan to give Irish people a cleaner, safer and more sustainable future to halve emissions by 2030 and reach net zero no later than 2050. The Plan sets out actions across every sector which will ensure we meet our future climate commitments. A key part of the CAP24 is to increase the proportion of renewable electricity to up to 80% by 2030 and a target of 9GW from onshore wind. These measures will be driven by introduction of the Renewable Electricity Support Scheme ('RESS') which aims to promote the generation of electricity from renewable sources.

The RESS is an auction-based scheme which invites renewable electricity projects to bid for capacity and receive a guaranteed price for the electricity they generate.

RESS 1 was the first Renewable Electricity Support Scheme run by the Government of Ireland and concluded in 2020. RESS 2 was run in 2022 and concluded in June 2022. The successful projects in RESS 2 represent a potential increase of nearly 20% in Ireland's current renewable energy generation capacity. They will be delivered between 2023 and 2025. A public consultation was opened in 2022 to refine the Terms and Conditions developed for RESS 2 with a limited and specific set of changes for RESS 3. This consultation closed in December 2022. RESS 3 was ran in 2023 and concluded in September 2023.

The RESS ensures that we are on a pathway to meet our ambitious climate targets and lays the foundations of a thriving and cost-effective renewable electricity market. This will support the growth of the green economy, create sustainable work opportunities, and ultimately benefit the consumer as renewables become more cost effective and increase Ireland's energy security.

The Proposed Project is in accordance with the CAP24 and a grant of permission for the onshore wind energy development will allow for the Proposed Project to participate in the RESS auction and contribute renewable energy generation in achieving Irelands CAP24 target of 9GW of onshore wind generation by 2030.

2.6 Planning History

This Section of the EIAR sets out the relevant planning history of the Proposed Project application site, and also identifies other wind energy developments within the wider area (25km from the proposed turbines).

2.6.1 Planning Applications within the Proposed Project Application Boundary

A planning search was carried out through the national planning application database and An Bord Pleanála's online planning portal in December 2024 for relevant planning applications submitted within the past 10 years that fall within the planning application boundary of the Proposed Project which are outlined in **Table 2-4** below.

Table 2-4 List of planning applications within the Proposed Project planning application boundary.

Pl Ref	Description	Decision
15292	for the retention of 2 no recently constructed farm entrances onto the Kilmanagh Road at Tullaroan. The entrances to be retained replaced 2 no existing entrances recently closed, located approximately 90m to the South East of the entrances to be retained. The retention application also includes gates, fencing and associated works	Granted by Kilkenny County Council 18/08/2015
15784	for the erection of an extension and alterations to existing dwelling house and all associated site works	Granted by Kilkenny County Council 11/03/2016
16274	Extension of Duration of Planning Permission Reference in Planning Register P. 11/108	Granted by Kilkenny County Council 29/07/2016
16273	Extension of Duration of Planning Permission Reference in Planning Register P. 16/273	Granted by Kilkenny County Council 29/07/2016
16558	retention permission for domestic garage as constructed and all associated site works	Granted by Kilkenny County Council 14/11/2016
16561	for the construction of a two storey dwelling, attached garage, new entrance, waste water treatment system and all associated site development works on the curtilage of a protected structure NIAH ref No.12400906 RPS ref No.C337	Granted by Kilkenny County Council 20/03/2017
16674	for construction of single storey dwelling house, domestic garage, foul	Granted by Kilkenny County Council 29/03/2017

	effluent treatment system, percolation area, entrance, demolition of existing habitable dwelling and all associated site works	
16744	to construct a two storey, four bed dwelling served by a packaged wastewater treatment system and a soil polishing filter, private on-site bored well, new site entrance and a garage with all associated site works	Granted by Kilkenny County Council 31/03/2017
16756	for development for a hotel and multi purpose, function conference and Health/Spa centre with a total Gross Floor Area of 5,084 sq m on a site measuring 12.9 ha approximately at Uppercourt House (protected structure, RPS C390). The proposed development includes for 1. The alterations and additions and a change of use (from residential to hotel) to an existing four storey building known as Upper Court House, (Protected Structure RPS C390) to function rooms, Health Spa Rooms and 19 no. bedrooms. 2. The alterations and additions and a change of use (from former Chapel to hotel) of the former Catholic private Chapel to a function room with bar and kitchen. 3.The alterations and internal construction and a change of use (from former dormitory to hotel) of the former 3 storey Dormitory block to 49 no. bedroom units and 2 staff apartments including external alterations to the window fenestration and plaster finish. 4. The alterations, internal construction and single storey extensions and a change of use to a hotel to the single storey link corridor with a front extension comprising of an entrance foyer, a rear extension comprising of a reception and toilet block and the replacement of the felt flat roof to a pitched slate roof with ridge glazing including external alterations to the window fenestration and plaster finish. 5. It is also proposed to locate ancillary structures outside the main complex including a generator, and substation and a guest car park; Landscaping works are to be provided to the surrounding grounds. With modifications to the drive way and to retain existing storm water to existing storm water drains and retain existing foul water connection to public mains and 6. All necessary ancillary services for all of the above	Granted by Kilkenny County Council 29/09/2017

1827	for the proposed demolition of an existing habitable dwelling house, outbuildings and associated agricultural buildings to facilitate the erection of a fully serviced dwelling house along with all associated site works, to include the decommission of an existing septic tank and installation of a package treatment plant and polishing filter	Granted by Kilkenny County Council 14/05/2018
18677	for a) Construction of a new single storey detached dwelling of 289 sq.m. (246 sq.m. at ground floor level and 43 sq.m. at mezzanine floor level within the vaulted roofspace), b) New vehicular entrance to existing road and off street parking, c) New soft landscaping to boundaries and freestanding walls surrounding building to define external spaces, and, d) All associated siteworks at a 0.3035 Hectare Site	Granted by Kilkenny County Council 16/01/2019
19585	to retain domestic garage, dog kennels and stores as constructed including associated site works	Granted by Kilkenny County Council 11/11/2019
19145	to build a two bedroom bungalow, all necessary site works, entrance gateway and connection to existing roadside water and sewage services	Granted by Kilkenny County Council 06/12/2019
19529	for works to existing pharmacy building incorporating adjoining vacant dwelling and associated site works. Works to include: - Demolition of two storey extension at rear of existing vacant dwelling and section of rear wall to allow for the construction of a single storey structure to provide additional dispensary area and new canteen. - Extending pharmacy area at ground floor level and provision of downstairs WC and consultation room. - Alterations to elevation at Church Street-widening of main entrance door to pharmacy, replacement of external door with window at vacant dwelling and fitting new raised door and opening at store building, replacing all windows to match pharmacy windows including removal of dashed wall finish and providing external rendered finish to match pharmacy.	Granted by Kilkenny County Council 18/02/2020
2093	to remove the unauthorised agricultural entrance onto Road No. LP1004 and to retain, widen and improve the existing agricultural entrance onto Road No. LP1002	Granted by Kilkenny County Council 26/06/2020
20590	for new single storey extension to the side of existing dwelling house, consisting of living room/dining area,	Granted by Kilkenny County Council 29/01/2021

	bedroom, internal alterations and associated site works	
20754	for alterations, extension and renovation of existing structure, plus a change of use from disused community hall / technical school house to a new private dwelling, new site entrance, plus all associated site works	Granted by Kilkenny County Council 09/02/2021
21469	for a new single storey sun room extension to the side of existing dwelling house	Granted by Kilkenny County Council 23/08/2021
21752	for development consisting of alterations and single-storey extension to existing school to include 1 no. classroom, 1 no. accessible shower/WC, link corridor and ancillary related works	Granted by Kilkenny County Council 22/11/2021
21627	for a ten-year appropriate period planning permission for development of this site; the proposed development will constitute the provision of the following: The installation of 31.49km of a 38kV underground electrical cabling and all other ancillary works including joint bays, culverts, maker posts and all associated development in the townlands of Killeen, Rathmacan, Gortnagap, Kyleballyoughter, Courtstown, Raheen, Lates, Curraghscarteen, Canvarstown, Trenchardstown, Lisnalea, Hillend, Coldharbour, Killahy, Greenhill, Lughinny, Craddockstown, Tubbrid Lower, Clomantagh Lower, Barna, Newtown, Kilrush, Belville, Lodge, Garranamanagh, Balleen Lower, Lodge, Tifeaghna (Browne), Lodge Demesne West, Lodge Demesne East, Clontubbrid, Clone, Acragar, Skinstown, Lisdowney, Seskin South, Parksgrove Ballyragget & Moatpark, Co. Kilkenny. Advisory Note: The full extent of the grid connection is 33.8km, and a separate planning application will be made for an underground grid connection to Tipperary County Council. The development comprises part of an overall development for which planning permission was granted for a 9 turbine wind farm and all associated works on lands located in the townlands of Farranroy Upper, Farranroy Lower, Coolnashinnagh & Gortnasmuttaun, Co. Tipperary. The planning application will be accompanied by an Environmental	Granted by Kilkenny County Council 26/09/2022

	Impact Assessment Report (EIAR) and Natura Impact Statement.	
22478	for construction of single storey dwelling, domestic garage, entrance, foul effluent treatment system, percolation area and all associated site works	Granted by Kilkenny County Council 27/02/2023
2360248	for an amendment to planning application previously granted under reference PL/21/627 in the townlands of Killeen, Rathmacan, Gortnagap Kyleballyoughter, Courtstown, Raheen, Lates, Curraghscarteen, Canvarstown, Trenchardstown, Lisnalea, Hillend, Coldharbour, Killahy, Greenhill, Lughinny, Craddockstown, Tubbrid Lower, Clomantagh Lower, Barna, Newtown, Kilrush, Belville, Lodge, Garranamanagh, Balleen Lower, Lodge, Tifeaghna (Browne), Lodge Demesne West, Lodge Demesne East, Clontubbrid, Clone, Acragar, Skinstown, Lisdowney, Seskin South, Parksgrove Ballyragget & Moatpark, Co Kilkenny. The previously consented planning application comprised the installation of 31.4 km of a 38kV underground grid connection comprising cable ducting and associated electrical cabling and all other ancillary works including joint bays, culverts, maker posts and all associated development. The proposed amendments to the previously consented grid connection comprise: • Increase in number of joint bays along the extent of the grid connection from a total of 35 to 45 joint bays • Grid connection to be operated at 38kV but installed to a 110kV underground cable design standards/infrastructure • Minor Adjustments to the route and red line boundary	Granted by Kilkenny County Council 17/01/2024
2360330	for the Proposed installation of a network connection and grid connection, and minor amendments to solar farms previously approved under planning application references 17/669 and 22/126. The proposed development will consist of the installation of a 33kV network connection between the solar farms approved under planning application references 17/669 and 22/126	Granted by Kilkenny County Council 02/04/2024

	comprising: c. 921m of overhead line and 9 No. wooden poles; onward connection of said approved solar farms to Ballyragget 38kV Substation by installation of a 38kV cable comprising c. 786m of underground cable and c. 395m of overhead line on 5 No. wooden poles; amendments to solar farm approved under planning reference 17/669 comprising removal of substation and replacement with solar panels; amendments to the layout of the substation approved under planning reference 22/126, and all associated site works	
2460156	PERMISSION for alterations, to a previously granted permission P20/754. Alterations for which indefinite retention is sought include for the construction of a single storey extension as opposed to the permitted two storey extension, variations to permitted façade of both the original structure and new link building, including the omission of a proposed new entrance lobby. The permitted new site entrance, plus all associated site works are as previously granted	Granted by Kilkenny County Council 21/06/2024
23141	(A) 8 No. Semi -detached, two storey, three bedroom dwellings, (with optional ground floor rear extensions) (B) proposed vehicular entrance, (C) Proposed internal roads/ footpaths and public lighting, (D) Proposed connection to existing Foul, Storm and Water main infrastructure. (E) Proposed diversion of existing foul drain. (F) Demolition of 2 No. Existing sheds, (G) Demolition of front boundary wall, (H) Proposed Landscaping/boundary treatments and all associated site works	Granted by Kilkenny County Council 28/06/2024
22493	of planning permission ref. no. 16/756	Granted by Kilkenny County Council 17/10/2024
2485	of planning permission 22/493	Granted by Kilkenny County Council 17/10/2024
2460241	for a Battery Energy Storage System (BESS) in the townland of Moatpark, Ballyragget, Co. Kilkenny. The development will consist of; • A 10-year Planning Permission and an operational life of 35 years • 29 units of 8 containers on concrete plinth foundations containing batteries and related equipment	Notification of Decision to Grant by Kilkenny County Council 10/12/2024

	• 29 no. prefabricated modular power conversion units • Containerised power transformers • Underground electrical and communications cabling • Upgrade of existing site access • Provision of on-site access tracks • 1 no. temporary construction compound • 4 no. spare parts containers • All associated and ancillary site development, lighting, perimeter fence, landscaping, drainage and CCTV. The planning application will be accompanied by a Natura Impact Statement (NIS).	
2460534	for a 2000sq.m extension to the existing Ballyragget 110kV Substation compound including; Site clearance works including the removal of existing palisade fence along the North and West boundaries and demolition of an existing Interface Transformer bund foundation. Provision of new electrical plant and equipment including: 1 No. Power Transformer, associated bund and firewall (c. 67 m2, 5.6 m high), 1 No. 20 / 10 kV Interface Transformer and associated bund (c. 25 m2, and 2.25 m high), 1 No. Arc Suppression Coil and associated bund (c. 18 m2, and 4.0 m high), a 38 kV busbar plinth with 3 No. cubicles and associated cable sealing ends (c. 6.5 m high), associated and ancillary outdoor electrical equipment and other apparatus, including installation of underground cables; Site development works including provision of extension of lighting, internal access road, new fencing, provision of site services including drainage; and all other ancillary works	Decision from Kilkenny County Council due by 10/01/2025
ABP Ref. 308824	N77 Ballyragget Village to Ballynaslee Road Improvement Scheme	Approved by An Bord Pleanála 26/08/2021

2.6.2 Wind Energy Developments within 25km of the Proposed Turbines

A planning search was carried out to establish permitted, operational and proposed wind energy developments within 25km of the proposed turbines for the purposes of informing the potential cumulative effects (see Section 2.8 of this Chapter for further details). The search was carried out using the relevant local authority, the Board's and EIA planning portals in December 2024 for relevant planning applications.

In total, 22 no. applications relating to wind energy were identified within 25km of the proposed turbines, 5 no. of which relate to single turbine development and a further 17 no. of which relate to larger multiple turbine wind farm developments. These are outlined in greater detail in **Table 2-5** below:

Table 2-5 Table of Wind Energy Developments within 25km of the Proposed Project

Pl. Ref.	Applicant	Wind Farm	Description	Decision	Status	Turbine No.	Approximate Distance to Nearest Turbine (km)
Single/ Domestic Turbines							
Tipperary CC Pl. Ref. 09/801 **EOD 15/600723**	Gurteen Wind Farm Ltd	Single turbine – Gurteen Lower Wind Turbine	1 no. wind turbine, site tracks, hard standing areas, anemometry mast, small control building and compound, underground cabling, temporary site works and ancillary works	Granted by Tipperary County Council on 16/12/2010 EOD Granted 29/09/2015	Granted Planning Permission	1	c.11.7km
Tipperary CC Pl. Ref. 13/231 **ABP Ref. 23.243357**	Biogas Environmental Tipperary East Ltd	Single turbine – Ballincurry Wind Turbine 1	a single wind turbine, overall height of up to 126.5 metres, electrical control building, access road, attenuation pond and ancillary site works	Granted by ABP on 01/10/2014	Granted Planning Permission	1	c.14km
Tipperary CC Pl. Ref. 15/600561 **ABP Ref. 92.245874**	Ballincurry Wind Farm Limited	Single turbine – Ballincurry Wind Turbine 2	a single wind turbine, overall height of up to 138 metres, electrical control building, access road and ancillary site works	Granted by ABP on 26/08/2016	Granted Planning Permission	1	c.14km
Kilkenny CC Pl. Ref. 13/151 **EOD 20/281**	Art Generation Ltd.	Extension to Ballybay Wind Farm	for one wind turbine with a hub height of 74.5m and a maximum blade tip height of 110m, together with associated access roads and site works. The proposed turbine will form part of and be operated as an extension to the permitted windfarm Planning Ref No 12/533 on an adjacent site. An appropriate period of 10 years (duration of the planning permission to construct the development) is sought, with an operational life of 25 years after the date of commissioning. An Environmental Impact Statement (EIS) and Natura Impact Statement (NIS) accompany this application.	Granted permission by Kilkenny County Council on 26/06/2013 EOD Granted 18/07/2020	Granted Planning Permission	1	5.4km
Kilkenny CC Pl. Ref. 16/17 **EOD 23/81**	Art Generation Ltd	Extension to Foyle Wind Farm	in the townslands of Killeen, Foylatalure and Courtstown, Tullaroan, Co. Kilkenny, for one wind turbine with a hub height up to 80m and a maximum blade tip height up	Granted permission by Kilkenny County Council on 11/04/2016	Granted Planning Permission	1	c.2.5km

Pl. Ref.	Applicant	Wind Farm	Description	Decision	Status	Turbine No.	Approximate Distance to Nearest Turbine (km)
			to 121m, underground cabling, together with associated access road (337m) and site works. The proposed turbine will form part of a permitted wind farm (PL. Ref. 12/378 as amended by PL13/9) on the adjacent Foylatalure and Courtstown site and will utilise/share the constructed access roads, borrow pit and permitted control building. The development also proposes a 20kV electrical connection between the permitted adjacent Foylatalure Wind Farm (PL.Ref. 12/378 as amended by PL 13/9) and permitted 38kV Sub-station at Ballybeagh Co. Kilkenny (PL.Ref.12/485). The 20kV electrical connection (c.5.275km long) will consist of: c.2.293km of overhead 20kV line mounted on single pole sets and c.2.982km of underground ducted 20kV cable in the townlands of Courtstown, Rathmacan, Kyleballyoughter, Gortnagap and Ballybeagh. An appropriate period of 10 years (i.e. duration of the planning permission to construct the development) is sought, with an operational life of 25 years after the date of commissioning. An Environmental Impact Statement and Natura Impact Statement accompany this application	EOD Granted 12/07/2023			
Larger Wind Energy Applications							
Kilkenny CC Pl. Ref. 12/378	Art Generation Ltd	Foyle Wind Farm	For a windfarm comprising of four turbines with a hub height of 80m and a maximum blade tip height of 121m, together with an electrical transformer plant, control housing, borrow pit, metrological mast and associated access roads and site works. This will replace a previous permission for a windfarm granted under Planning ref no 05/1256 which was extended under 11/461 for five	Granted permission by Kilkenny County Council on 14/11/2012. EOD Granted 12/07/2023	Granted Planning Permission	4	c.2.5km

Pl. Ref.	Applicant	Wind Farm	Description	Decision	Status	Turbine No.	Approximate Distance to Nearest Turbine (km)
			turbines with a hub height of 49m and a maximum blade tip height of 76m on a smaller site, Permission is being sought for a 10 year period. An Environmental Impact Statement (EIS) and Natura Impact Statement (NIS) accompany this application				
Kilkenny CC Pl. Ref. 12/533	ART Generation Ltd.	Ballybay Wind Farm	For windfarm, in the townslands of Boggan and Ballybeagh, Tullaroan, Co. Kilkenny, comprising of six turbines with a hub height of 74.5m and a maximum blade tip height of 110m, together with a borrow pit, 80m permanent metrological mast and associated access roads and site works. This will replace a previous permission for a windfarm granted under Planning ref no. 02/1072 which was extended under 08/735 and subsequently under 12/194 for five turbines, four turbines with a hub height of 60m and maximum blade tip height of 93m and one turbine with a hub height 49m and maximum blade tip height of 82m, on a site at Ballybeagh, Tullaroan, Co. Kilkenny. An appropriate period of 10 years (duration of the planning permission to construct the development) is sought, with an operational life of 25 years after the date of commissioning. An Environmental Impact Statement (EIS) and Natura Impact Statement (NIS) accompany this application.	Granted permission by Kilkenny County Council on 20/02/2013	Granted Planning Permission	6	5.8km
Kilkenny CC Pl. Ref. 16/666 **EOD 24/33**	Art Generation Ltd.	Kyleballyoughter Wind Farm	for 2 No. wind turbines with a hub height up to 80m and a maximum blade tip height up to 121m, A grid control building, underground cabling, borrow pit, together with associated access roads and site works. The proposed turbines will form part of a permitted wind farm (PL. Ref.12/378 as amended by PL 13/9) on the adjacent	Granted permission by Kilkenny County Council on 27/03/2017 EOD Granted 13/05/2024	Granted Planning Permission	2	3.3km

Pl. Ref.	Applicant	Wind Farm	Description	Decision	Status	Turbine No.	Approximate Distance to Nearest Turbine (km)
			Foylatalure and Courtstown site. An appropriate period of 10 years (i.e. duration of the planning permission to construct the development) is sought with an operational life of 25 years after the date of commissioning. An Environmental Impact Statement has been submitted with this application				
Tipperary CC Pl. Ref. 09/781	Cnoc Windfarms Ltd	An Cnoc Wind Farm	5 no. wind turbines, site tracks, hard standing areas, anemometry mast, small control building and compound, underground cabling, site signage, temporary site works and ancillary works; an Environmental Impact Statement has been submitted with application	Granted permission by Tipperary County Council on 22/03/2011	Granted Planning Permission	5	7.1km
Kilkenny CC Pl. Ref. 08/1511	Matt Bergin & Thomas McEvoy	Lisdowney Wind Farm	For development which will consist of 4 wind turbines with service roadways, electrical control and transformer compound and anemometer. The application is accompanied by an Environmental Impact Statement	Granted permission by Kilkenny County Council on 28/01/2010	Granted Planning Permission	4	15.5km
Tipperary CC Pl. Ref. 06/510773	Anglo American Lisheen Mining Ltd.,	Lisheen Wind Farm I	wind turbine farm consisting of 22 No. wind turbine generators, access roads, craneage pads and associated infrastructure. An Environmental Impact Statement will be submitted to the Planning Authority with this Application	Granted permission by Tipperary County Council on 14/08/2007	Granted Planning Permission 22 Turbines applied for, 2 Turbines removed through conditions, 18 turbines built	18	c. 20.7km
Tipperary CC Pl. Ref. 09/510100	SWS Energy Ltd	Lisheen Wind Farm II	12 no wind turbines (hub height 95m, blade diameter 90m), with an overall height from ground to blade tip of 140m, the use of 3 no.	Granted permission by Tipperary County	Granted Planning Permission	12	c. 19km

Pl. Ref.	Applicant	Wind Farm	Description	Decision	Status	Turbine No.	Approximate Distance to Nearest Turbine (km)
			new borrow pits, construction of internal site tracks, upgrade of existing access track and associated works as an extension to Lisheen Wind Farm (Pl Ref no 06/51/0773, ABP Ref PL22.222142). An EIS has been submitted with this application.	Council on 30/09/2009			
Kilkenny CC Pl. Ref. 20/459 **Laois CC Pl. Ref. 20/386**	Lisheen III Wind Farm Limited	Lisheen Wind Farm III	Kilkenny County Council: The development will consist of alterations to a previously permitted wind farm development (Planning Register References 14/202, 15/629 & 19/787 (Kilkenny), 14/139 & 19/597 (Laois) and 14/510138 & 15/600924 (Tipperary) where the permitted development also extends into the townlands of Graigueadrisly, County Laois and Killoran near Templetuohy, County Tipperary. The proposed alteratons will consist of: increasing the tip height of the six permitted turbines from a maximum of 156m to a maximum of 169m and extending the operational lifetime of the wind farm, from the date of commissioning, from 25 years to 30 years. A ten-year permission is sought. The application is accompanied by a Natura Impact Statement, Planning Report and Environmental Considerations Report. Lisheen III Wind Farm Limited also intends to apply to Laois County Council for planning permission for development at Graigueadrisly, County Laois. The proposed alterations will consist of: increasing the tip height of two permitted turbines from a maximum of 156m to a maximum of 169m and extending the operational lifetime of the wind farm, from the date of commissioning, from 25 years to 30 years	Granted permission by Kilkenny County Council on 12/01/2021 Granted permission by Laois County Council on 01/03/2021	Granted Planning Permission	8	c. 21km

Pl. Ref.	Applicant	Wind Farm	Description	Decision	Status	Turbine No.	Approximate Distance to Nearest Turbine (km)
			Laois County Council: The development will consist of alterations to a previously permitted wind farm development (Planning Register References 14/139 & 19/597 (Laois), 14/202, 15/629 & 19/787 (Kilkenny) and 14/510138 & 15/600924 (Tipperary)) where the permitted development also extends into the townlands of Bruckana , Baunmore and Rathpatrick, County Kilkenny and Killoran near Templetuohy, County Tipperary. The proposed alterations will consist of: increasing the tip height of the two permitted turbines from a maximum of 156m to a maximum of 169m and extending the operational lifetime of the wind farm, from the date of commissioning, from 25 years to 30 years. A ten-year permission is sought. The application is accompanied by a Natura Impact Statement, Planning Report and Environmental Considerations Report. Lisheen III Wind Farm Limited also intends to apply to Kilkenny County Council for planning permission for development at Bruckana, Baunmore and Rathpatrick, County Kilkenny. The proposed alterations will consist of : increasing the tip height of six permitted turbines from a maximum of 156m to a maximum of 169m and extending the operational lifetime of the wind farm, from the date of commissioning, from 25 years to 30 years. The planning application includes a Natura Impact Statement.				
Tipperary CC Pl. Ref. 10/510118 **Laois CC**	Bord na Mona Energy Ltd.	Bruckana Wind Farm	Tipperary County Council: four wind turbines of up to 100m hub height and up to 112m rotor diameter with a total height not exceeding 156m; a transformer and crane hardstand area at each turbine;	Granted permission by Tipperary County Council on 11/02/2011	Granted Planning Permission	14	c.22km

Pl. Ref.	Applicant	Wind Farm	Description	Decision	Status	Turbine No.	Approximate Distance to Nearest Turbine (km)
Pl. Ref. 10/129 **Kilkenny CC Pl. Ref. 10/145**			underground electrical and communication cables linking the turbines; internal site tracks; drainage works; a section of the proposed 38kV overhead power line from the proposed 38kV substation in Bruckana to the 110kV Lisheen substation; and associated works. This development is part of a larger development which extends to parts of County Laois (townland of Baunaghra) and County Kilkenny (townlands of Bruckana, Rathpatrick and Baunmore). The development as a whole will consist of a wind farm comprising: sixteen wind turbines of up to 100m hub height and up to 112m rotor diameter with a total height not exceeding 156m; a transformer and crane hardstanding area at each turbine; underground electrical and communication cables linking the turbines; internal site tracks; a permanent meteorological lattice mast 100m high; drainage works; a 38 kV substation and associated equipment and control building with associated septic tank and treatment system; a 38 kV overhead line to the 110 kV Lisheen substation; and associated works. An Environmental Impact Assessment accompanies the application. The development is proposed on a site that is the subject of an integrated Pollution Control Licence (Reg. No. 499) as issued by the EPA in accordance with the provisions of the Environmental Protection Agency Act, 1992 Laois County Council: erect 4 wind turbines of up to 100m hub height and up to 112m rotor diameter with a total height not exceeding 156m; a	Granted permission by Laois County Council on 26/01/2011 Granted permission by Kilkenny County Council on 24/11/2010			

Pl. Ref.	Applicant	Wind Farm	Description	Decision	Status	Turbine No.	Approximate Distance to Nearest Turbine (km)
			transformer and crane hardstand area at each turbine; underground electrical and communications cables linking the turbines; internal site tracks; drainage works and associated works. This development is part of a larger development which also extends to parts of Co. Kilkenny and North Tipperary. The development as a whole will consist of a wind farm comprising; sixteen wind turbines of up to 100m hub height and up to 112m rotor diameter with a total height not exceeding 156m; a transformer and crane hardstanding area at each turbine; underground electrical and communication cables linking the turbines; internal site tracks; a permanent meteorological lattice mast 100m high; drainage works; a 38kV substation and associated equipment and control building with associated septic tank and treatment system; a 38kV overhead line to the 110kV Lisheen substation and associated works. An Environmental Impact Assessment accompanies the application. The development is proposed on a site that is the subject of an integrated Pollution Control Licence (Reg. No. 499) as issued by the EPA in accordance with the provisions of the Environmental Protection Agency act, 1992 Kilkenny County Council: for development. The development will consist of eight wind turbines of up to 100m hub height and up to 112m rotor diameter with a total height not exceeding 156m; a transformer and crane hardstand area at each turbine; under-ground electrical and communication cables linking the turbines;				

Pl. Ref.	Applicant	Wind Farm	Description	Decision	Status	Turbine No.	Approximate Distance to Nearest Turbine (km)
			internal site tracks, the upgrading of existing access tracks; drainage works; a 38kV substation with associated equipment and control building with associated septic tank and treatment system; a section of the proposed 38kV overhead power line from the proposed 38kV substation in Bruckana to the 110kV Lisheen substation; a permanent meteorological lattice mast 100m high; and associated works. This development is part of a larger development which also extends to parts of County Laois (townland of Baunaghra) and North Tipperary (townlands of Killoran and Tullowmacjames). The development as a whole will consist of a wind farm comprising: 16 wind turbines of up to 100m hub height and up to 112m rotor diameter with a total height not exceeding 156m; a transformer and crane hardstanding area at each turbine; underground electrical and communication cables linking the turbines; internal site tracks; a permanent meteorological lattice mast 100m high; drainage works; a 38kV substation and associated equipment and control building with associated septic tank and treatment system; a 38kV overhead line to the 110kV Lisheen substation; and associated works. An Environmental Impact Assessment accompanies the application. The development is proposed on a site that is the subject of an Integrated Pollution Control Licence (Reg. No. 499) as issued by the EPA in accordance with the provisions of the Environmental Protection Agency Act, 1992				

Pl. Ref.	Applicant	Wind Farm	Description	Decision	Status	Turbine No.	Approximate Distance to Nearest Turbine (km)
Tipperary CC Pl. Ref. 20/972	Gromane Limited	Farranrory Wind Farm	a ten year planning permission for a renewable energy development with a 40-year operational life (from the date of commissioning of the renewable energy development). The entirety of the development constitutes the provision of a 9-turbine wind farm and all associated works on lands in both Counties Tipperary and Kilkenny. This development comprises part of an overall development for which planning permission is also sought for a 38kV substation in the townland of Killeen, Co. Kilkenny. A separate planning application will be made for an underground grid connection to Tipperary County Council and to Kilkenny County Council. The proposed development will constitute the provision of the following: • Construction of up to 9 turbines each with a maximum overall ground to blade tip height of up to 150 metres and associated foundations and hardstand areas; • Construction of new site entrances and upgrade of existing site entrances; • Internal wind farm underground power and communications cabling; • Upgrade of existing access tracks and provision of new site access roads; • Removal of existing Meteorological Masts and construction of 1 new Meteorological Mast for monitoring wind speeds with a maximum height of up to 85 metres; • Site drainage network • Construction of a new temporary site compound for use during construction; • Two Borrow Pits • Construction of a new on-site 38kV substation The planning application will be accompanied by an	Granted permission by Tipperary County Council on 20/03/2021	Granted Planning Permission	9	c.6km

Pl. Ref.	Applicant	Wind Farm	Description	Decision	Status	Turbine No.	Approximate Distance to Nearest Turbine (km)
			Environmental Impact Assessment Report (EIAR) and Natura Impact Statement.				
Tipperary CC Pl. Ref. 21/1502 **ABP Ref. 315176**	ABO Wind Ireland Limited	Knockroe Wind Farm	a ten-year permission of a wind farm project. The development will consist of: Construction of up to 7 no. wind turbines with a maximum overall tip height of 150m, comprising a tower of between 75-95m high, to which three blades of between 55-70m in length will be attached; Associated hard stand areas at each turbine; 1 no. 30m permanent meteorological mast and all associated infrastructure and works; 1 no. 38kV electrical substation and all associated infrastructure and works; 20kV underground cables facilitating the connection of turbines to 38kV electrical substation and all associated infrastructure and works; Circa 19km of 38kV underground cabling and all associated works along public roads to facilitate the connection of the proposed 38kV wind farm electrical substation to the existing 38/110kV Doon substation in the townland of Ballyvaughan; Provision of a new site entrance on the L2035; Upgrading of existing agricultural tracks and construction of new site tracks and all associated works as required; A temporary site compound and all associated works; Demolition of 2 no. derelict buildings; Provision of 2 no. cattle underpasses circa 400m and circa 580m to the east of the new site entrance; and all associated infrastructure and site development works. The proposed underground cabling works located within the public road corridor cross Protected Structure RPS S121 (Loughcapple Bridge). An Environmental Impact Assessment	Granted permission by ABP on 01/12/2023	Granted Planning Permission	7	c.17.4km

Pl. Ref.	Applicant	Wind Farm	Description	Decision	Status	Turbine No.	Approximate Distance to Nearest Turbine (km)
			Report (EIAR) and Natura Impact Statement (NIS) have been prepared in respect of the proposed development and will be submitted with the application				
ABP Ref. 315365	White Hill Wind Limited	White Hill Wind Farm	Wind energy development consisting of 7 no. wind turbines and all associated works.	Granted permission by ABP on 21/11/2023	Granted permission by ABP	7	c.23.2km
Wind Farms at Pre-Application Consultation Stage							
ABP Ref. 314186	Killoshulan Renewable Energy Limited	Killoshulan Wind Farm	Proposed development of 13 wind turbines together with all associated works	Consultation has yet to be concluded	Pre-Application Consultation	13	c.12.4km
ABP Ref. 316156	Ecopower Developments	Fassa Wind Farm	Proposed development of Fassa Windfarm which comprises between 13 and 20 wind turbines along with meteorological masts, access roads, an electrical substation and related ancillary works. A grid connection to either Pinewood 110kV substation or Ballyragget 110kV substation will be included in the planning application.	Consultation has yet to be concluded	Pre-Application Consultation	13-20	c. 24km
ABP Ref. 317589	EDF Renewables Ireland Limited	Freneystown Wind Farm	Proposed Renewable Energy Development of 8 wind turbines and all associated works	Consultation has yet to be concluded	Pre-Application Consultation	8	c. 18km
ABP Ref. 311587	Bord na Móna Powergen Limited	Littleton Wind Farm	Proposed development of between 14 and 18 no. wind turbines, 110kV on-site substation and associated connection to the national grid.	Pre-Application	Pre-Application Consultation	14	c. 15km
ABP Ref. 312016	Rowanmere Limited	Ballynalacken Wind Farm	Proposed Ballynalacken Windfarm comprising of nine wind turbines of .6MW/6.5MW installed capacity each, meteorological mast, access roads electrical substation compound and control buildings, grid connection and all associated works.	Pre-Application	Pre-Application Consultation	9-12	c. 20.5km

2.7 Scoping and Consultations

2.7.1 Scoping

Scoping is the process of determining the content, depth and extent of topics to be covered in the environmental information to be submitted to a competent authority for projects that are subject to an Environmental Impact Assessment (EIA). This process is conducted by contacting relevant authorities and Non-Governmental Organisations (NGOs) with interest in the specific aspects of the environment with the potential to be affected by the proposal. These organisations are invited to submit comments on the scope of the EIAR and the specific standards of information they require. Comprehensive and timely scoping helps ensure that the EIAR refers to all relevant aspects of the Proposed Project and its potential effects on the environment and provides initial feedback in the early stages of the EIAR preparation, when alterations are still easily incorporated into the design. In this way scoping not only informs the content and scope of the EIAR, but it also provides a feedback mechanism for the proposal design itself.

As part of the constraints mapping process, which is detailed in Chapter 3 of this EIAR, telecommunications operators, were contacted in August 2023 in order to determine the presence of telecommunications links or aviation assets traversing or located in close proximity to the Proposed Wind Farm site. Following this exercise, an EIAR scoping document, providing details of the Proposed Project, was prepared by MKO and circulated to prescribed statutory and non-statutory bodies in November 2023. The scoping document provided details of the Proposed Project and set out the scope of work for the EIAR. Consultees were invited to contribute to the EIAR by suggesting baseline data, survey techniques and potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR.

2.7.2 Scoping Responses

Table 2-6 lists the responses received from the bodies to whom the scoping document was circulated. Copies of all scoping responses received are included in **Appendix 2-2** of this EIAR. If further responses are received, the comments of the consultees will be considered, where applicable, in the construction, operation and decommissioning of the Proposed Project in the event of a grant of planning permission. The recommendations of the consultees have informed the scope of the assessments undertaken and the contents of the EIAR.

Table 2-6 Scoping Responses

Consultee	Date of Response
2rn (RTÉ Transmission Network Ltd.)	Response received 24th November 2023
An Taisce	No response received
Aviation Navigation Ireland	No response received
Ballycallan Group Water Scheme	No response received
Bat Conservation Ireland	No response received
Birdwatch Ireland	No response received
Coimisiún na Meán (formerly Broadcasting Authority of Ireland)	Response received 24th November 2023
Commission for Communications Regulation	Response received 1st August 2023
Commission for Regulation of Utilities, Water and Energy	No response received

Department of Agriculture, Food and the Marine	Response received 4th December 2023
Department of Environment, Climate and Communications	No response received
Department of Defence	Response received 4th December 2023
Department of Housing, Local Government and Heritage National Parks and Wildlife Service (NPWS)	Response received 15th January 2024 Response received 1st February 2024
Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media	No response received
Department of Transport	Response received 19th December 2023
Eir	Response received 21st December 2023
EirGrid	Response received 10th January 2024
Enet Telecommunications Networks Limited	Response received 27th November 2023
EOBO Ltd	No response received
ESB Networks	Response received 5th January 2024
ESB Telecoms	No response received
Failte Ireland	Response received 6th December 2023
Fastcom Broadband Limited	No response received
Forest Service	No response received
Geological Survey of Ireland	Response received 5th December 2023
Health Service Executive	Response received 4th January 2024
Iarnród Éireann	Response received 28th November 2023
Imagine Group Communications	No response received
Inland Fisheries Ireland	No response received
Irish Aviation Authority	Response received 15th January 2024
Irish Raptor Study Group	No response received
Irish Red Grouse Association - Conservation Trust	No response received
Irish Water (Telecoms)	No response received
Irish Wildlife Trust	Response received 28th November 2023

Ivertec Ltd	Response received 24th November 2023
JFK Communications Ltd	No response received
Kilkenny Airport	No response received
Kilkenny County Council – Environment Department	No response received
Kilkenny County Council – Housing & Heritage Department	No response received
Kilkenny County Council – Planning Department	Response received 23rd February 2024
Kilkenny County Council – Roads and Transport	No response received
Kilkenny County Council – Roads and Water	No response received
Lackabeha Services Ltd T/A Airwaves Internet	No response received
Office of Public Works	No response received
Southern Regional Assembly	Response received 27th November 2023
Sport Ireland	No response received
Sustainable Energy Authority of Ireland	No response received
TETRA Ireland Communications Ltd.	No response received
The Heritage Council	No response received
Three Ireland Ltd.	Response received 27th November 2023
Tipperary County Council – Environment and Climate Action	Response received 24th November 2023
Tipperary County Council – Heritage and Conservation	Response received 24th November 2023
Tipperary County Council – Planning and Building	Response received 24th November 2023
Tipperary County Council- Roads and Transport	Response received 24th November 2023
Towercom	No response received
Transport Infrastructure Ireland	Response received 6th December 2023
Uisce Éireann	Response received 12th December 2023
Viatel Ireland Ltd.	No response received
Virgin Media Ltd (previously UPC)	No response received

Vodafone Ireland Ltd.	No response received
Waterford Airport	No response received
Waterways Ireland	Response received 24th November 2023
Whizzy Internet Limited	No response received

Table 2-7 below provides a summary of the details from the consultees. The table also identifies the relevant chapter where the points raised by each of the consultees are addressed.

Table 2-7 Summary of responses received from Consultees.

Consultee	Response Received	Response Summary	Addressed in Chapter
2rn (formerly RTE Transmission Network Ltd.)	Response received 24th November 2023	States they have no linking in the area but there is a risk of interference to broadcast services and asks that a protocol between the developer and 2rn be signed should the development go ahead.	Chapter 15 Material Assets
Coimisiún na Meán (formerly Broadcasting Authority of Ireland)	Response received 24th November 2023	Coimisiún na Meán does not perform an in-depth analysis of the effect of wind turbines of FM networks. States they are not aware of any issues from existing windfarms into existing FM networks and the proposed windfarm is not close to any existing or planning FM transmission sites.	
Commission for Communications Regulation	Response received 1st August 2023	Provided a list of organisations and contacts that may be of relevance.	
Department of Agriculture, Food and the Marine	Response received 4th December 2023	Letter summarising requirement for felling licence if the Proposed Project involves felling/ removal of trees. Note that there must be absolute spatial consistency between the felling licence areas submitted to DAFM (second authority) and all related planning documents submitted to the first authority in respect of the felling area(s)	Chapter 6 Biodiversity
Department of Defence	Response received 4th December 2023	The department is consulting with their Air Corps colleagues at Casement Aerodrome	Chapter 15 Material Assets
Department of Housing, Local Government and Heritage NPWS	Response received 15th January 2024 Response received 1st February 2024	The Department is not in a position to make specific comments on this particular referral at this time. The Department may submit observations/recommendations at a later stage in the process. Acknowledges receipt of meeting request.	
Department of Transport	Response received 19th December 2023	The Proposed Project especially the connection cables to national grid will have effects on both the environment and the Regional and local road network. Guidance on the placement of cables within the extents of the (regional and local) public road network was provided. Provided a list of items to be considered during the examination of the proposal including an examination of alternative cable routing. Provided conditions for the Board to consider should the decision result in proposal.	Chapter 3 Reasonable Alternatives Chapter 15 Material Assets

Eir	Response received 21st December 2023	Does not have transmission links that will be at risk by the development.	**Chapter 15 Material Assets**
EirGrid	Response received 10th January 2024	Position not to comment.	
Enet Telecommunications Network Limited	Response received 27th November 2023	Development will not affect their current network.	**Chapter 15 Material Assets**
ESB Networks	Response received 5th January 2024	Provided information on: • Avoiding Danger form Overhead Electricity Lines • Safe System of Work for Digging • Safe Construction with Electricity Notes that there are High Voltage Overhead Lines and Underground Cables in the area concerned. Further guidance provided on locating and excavation around cables. The response also states that all relevant documentation must be reviewed in advance of site works.	
Failte Ireland	Response received 6th December 2023	Provided EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects	**Chapter 5 Population and Human Health**
Geological Survey of Ireland	Response received 5th December 2023	Provided a link to a list of publicly available datasets which are recommended to be used when conducting the EIAR, SEA, planning and scoping processes. The Letter also outlined that the audit for Co. Kilkenny was completed in 2007 and revised in 2012, records show that there are no County Geological Sites (CGS) in the vicinity of the proposed Briskalagh Renewable Energy Development site boundary. The Groundwater Data Viewer indicates aquifers classed as a 'Poor Aquifer - Bedrock which is Generally Unproductive except for Local Zones' a 'Regionally important gravel aquifer' and a 'Regionally Important Aquifer – Karstified (diffuse)' underlie the proposed Renewable Energy Development site boundary. Recommend use of the Groundwater Viewer to identify areas of High to Extreme Vulnerability and 'Rock at or near surface' in your assessments, as any groundwater-surface water interactions that might occur would be greatest in these areas. Records show groundwater drinking water abstractions with zones of contribution/source protection areas close to the Renewable Energy Development site boundary. Given the nearby drinking water sources (Public Water Scheme, Group Water Schemes), the effects of any potential contamination as a result of the development would need to be assessed. The Groundwater Karst Viewer indicates that there are karst features in the vicinity of the development site boundary.	**Chapter 8 Land, Soils and Geology** **Chapter 9 Hydrology and Hydrogeology**

		They recommend use of the Aggregate Potential Mapping viewer to identify areas of High to Very High source aggregate potential within the area. Should development go ahead, all other factors considered, Geological Survey Ireland appreciate a copy of reports detailing any site investigations carried out. Should any significant bedrock cuttings be created, we would ask that they will be designed to remain visible as rock exposure rather than covered with soil and vegetated, in accordance with safety guidelines and engineering constraints. In areas where natural exposures are few, or deeply weathered, this measure would permit on-going improvement of geological knowledge of the subsurface and could be included as additional sites of the geoheritage dataset, if appropriate.	
Health Service Executive	Response received 4th January 2024.	Provided general guidance for EIAR sections/ chapters from a health perspective. An Emergency Management Report provided gives recommendations within the context of site operations.	**Chapter 1 Introduction** **Chapter 3 Reasonable Alternatives** **Chapter 4 Description** **Chapter 5 Population and Human Health** **Chapter 8 Land, Soils and Geology** **Chapter 9 Hydrology and Hydrogeology** **Chapter 10 Air Quality** **Chapter 12 Noise and Vibration**
Iarnród Éireann	Response received 28th November 2023	The proposed site is not within the GSM-R (Mobile Network for Railways) exclusion zone. Recommendations provided for exclusion zones and coordination zone.	
Irish Aviation Authority	Response received 15th January 2024	In the event of planning consent being granted, the applicant should be conditioned to contact the IAA to: Agree an aeronautical obstacle warning light scheme for the development. Provide as-constructed coordinates in WGS84 format together with ground and blade tip height elevations at each turbine location. Notify the Authority of intention to commence crane operations with at least 30 days prior notification of their erection	
Irish Wildlife Trust	Response received 28th November 2023	They do not have the staff capacity to respond to the consultation at the moment but will endeavour to respond if possible.	
Ivertec	Response received 24th November 2023	The development has no impact on any of their services.	

Kilkenny County Council	Response received 23rd February 2024	The EIAR address potential impacts pertaining to both County Kilkenny and County Tipperary. The applicant should address the visual impacts and cumulative visual impacts with any other windfarms within a reasonable vicinity of the site. The site is hydrologically connected to the King's River and Natura 2000 Network. There is a recorded monument within the development site ref. KK018-050---. There is potential for significant visual impacts on the nearby settlements of Kilmanagh and Tullaroan. The proposed wind farm and grid connection will require thorough assessment of potential impacts on sensitive receptors to include cumulative impacts with other wind farm proposals in the surrounding area. The applicant is advised to comply with Directive 2014/52/EU and '*Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment'* and any updates subsequent to the above Directive. The applicant shall consult inter-alia with the list of bodies provided. **Roads** Guidance on sightline, surface material and drainage requirements provided. The applicant should be requested by way of condition to provide a photographic & FWD survey of TDR in the case of the local and regional roads prior to construction and be repeated on completion of the TDR. Detailed guidance on TDR, roads, traffic management, grid connection matters and conditions provided. **Environmental Impacts** A list of items to be taken into consideration as a minimum provided. Guidance on surface water management, waste management, material storage, environmental impacts, wastewater management, site works and, vehicle inspection and maintenance plan provided.	**Chapter 6 Biodiversity** **Chapter 7 Ornithology** **Chapter 8 Land, Soils and Geology** **Chapter 9 Hydrology and Hydrogeology** **Chapter 13 Cultural Heritage** **Chapter 14 Landscape and Visual** **Chapter 15 Material Assets**
Southern Regional Assembly	Response received 27th November 2023	Acknowledges receipt of scoping document and forwarded to Southern Regional Assembly Planning Department for review.	
Three Ireland	Response received 27th November 2023	Turbine locations will have no impact on the Three Ireland Microwave Transmission network.	**Chapter 15 Material Assets**
Tipperary County Council – Environment and Climate Action	Response received 24th November 2023	Scoping document forwarded to Environment Section for their attention.	
Tipperary County Council –	Response received 24th November 2023	Scoping document forwarded to Cultural Services for their attention.	

Heritage and Conservation			
Tipperary County Council – Planning and Building	Response received 24th November 2023	Scoping document forwarded to Planning Section for their attention.	
Tipperary County Council- Roads and Transport	Response received 24th November 2023	Scoping document forwarded to Roads Section for their attention.	
Transport Infrastructure Ireland	Response received 6th December 2023	The developer should have regard, inter alia, to the following: • Consultations should be had with the relevant Local Authority/National Roads Design Office with regard to locations of existing and future national road schemes. • TII would be specifically concerned as to potential significant impacts the development would have on the national road network (and junctions with national roads) in the proximity of the Proposed Project, including the potential haul route. • The developer should assess visual impacts from existing national roads. • The developer should have regard to any EIAR/EIS and all conditions and/or modifications imposed by An Bord Pleanála regarding road schemes in the area. The developer should in particular have regard to any potential cumulative impacts. • The developer, in conducting EIA, should have regard to TII Publications. • The developer, in conducting EIA, should have regard to TII's Environmental Assessment and Construction Guidelines, including the 'Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes'. • The EIAR/EIS should consider the 'Environmental Noise Regulations 2006' (SI 140 of 2006) and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts. • It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site with reference to impacts on the national road network and junctions of lower category roads with national roads. In relation to national roads, the Authority's Traffic and Transport Assessment Guidelines (2014) should be referred to in relation to Proposed	**Chapter 3 reasonable Alternatives** **Chapter 12 Noise and Vibration** **Chapter 14 Landscape and Visual** **Chapter 15 Material Assets**

		Project with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of TII's TTA Guidelines, which addresses requirements for sub-threshold TTA. And improvements required to facilitate development should be identified. It will be the responsibility of the developer to pay for the costs of any improvements to national roads to facilitate the private development proposed, as TII will not be responsible for such costs. • The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required. • In the interests of maintaining the safety and standard of the national road network, the EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network. • TII recommends that that applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed. • The provision of cabling along the national road network represents a number of significant implications for TII and the road authorities in the management and maintenance of the strategic national road network, and TII is of the opinion that grid connection cable routing should reflect the foregoing provisions of official policy and therefore, avoid grid connection routing proposals along national roads. • Cable routing should avoid all impacts to existing TII infrastructure such as traffic counters, weather stations, etc. and works required to such infrastructure shall only be undertaken in consultation with and subject to the agreement of TII, any costs attributable shall be borne by the applicant/developer. The developer should also be aware that separate approvals may be required for works traversing the national road network.	
Uisce Eireann	Response received 12th December 2023	There is no Uisce Eireann infrastructure in the area, therefore Uisce Eireann have no objection in principle. General guidance on aspects of water services to be considered in the scope of an EIA provided Further consultation with Uisce Eireann included answering data requests which included shapefiles of Water and Sewer Networks located within the EIAR Site Boundary. This is summarised in Chapter 15 of the EIAR	**Chapter 15 Material Assets**
Waterways Ireland	Response received 24th November 2023	The development is not within any Zone of Influence of their waterways so they will not be commenting.	

2.7.3 Other Consultations

2.7.3.1 Pre- Planning Meetings

2.7.3.1.1 *Kilkenny County Council*

Members of the project team and the Applicant met with representatives from KCC in accordance with Section 247 of the Act via Microsoft (MS) Teams on the 29th February 2024.

The project team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- A high-level overview of the Proposed Project and the subject site.
- An introduction to the Applicant.
- Overview of relevant planning policy including compliance with local wind energy policy.
- Provided specific details of the scheme relating to LVIA and Ecology
- Discussed scoping and pre-application/public consultation undertaken to date.
- Set out the scope of the Environmental Impact Assessment Report to be undertaken.
- Set out the projected project timelines.

Following this presentation, there was further discussion held between the project team and the representatives of KCC. Matters discussed included:

- Draft ministerial direction on the KCCDP Wind Energy Strategy Areas.
- Archaeological impacts.
- Landscape and Visual impacts.
- Land, Soils and Geology impacts.
- Construction Phase Noise impacts.
- Material Assets impacts.
- Grid connection route.
- Operational life of the Proposed Wind Farm and Decommissioning Plan.

Representatives of KCC noted that due to the draft ministerial direction currently in place on the KCCDP, specifically the Wind Energy Strategy Areas, the Proposed Project will be assessed on its own merits with regard to national and regional policy as well as consideration of landscape and visual impact of the Proposed Project.

2.7.3.2 An Bord Pleanála

2.7.3.2.1 *Section 37B Consultation*

The Applicant engaged with the Board under the provisions of Section 37B of the Act (ABP-318714-23), as to whether the Proposed Wind Farm would meet the thresholds of the Seventh Schedule of the Act, as the Proposed Wind Farm initially had a generating potential of greater than 50MW). The applicant opened consultations with the Board in December 2023 in relation to the Proposed Wind Farm.

A SID meeting under the provisions of Section 37B was held with the Board on the 9th of February 2024.

The design team gave an overview of the Wind Farm elements of the Proposed Project in the form of a PowerPoint presentation which set out the following information:

- Introduction to the applicant and project team.
- A High-level overview of the Proposed Project and the Subject Site.

- Overview of planning policy including compliance with local wind energy policy.
- Provided specific details of the scheme relating to LVIA, Ecology and Aviation.
- Discussed scoping & pre-application/public consultation undertaken to date.
- Discussed the relevant Strategic Infrastructure Development criteria as set out in the Seventh Schedule of the Act.
- Set out the scope of the Environmental Impact Assessment Report to be undertaken.
- Set out the projected project timelines.

On the 21st June 2024 MKO, on behalf of the Applicant, sought to close the consultation process with the Board, it was noted that the proposal had been reduced to 7no. wind turbines and on that basis would not have a generating potential of greater than 50MW. On the 19th July 2024 the Board wrote to the Applicant and confirmed that consultation was closed and that the Proposed Wind Farm was not considered to be strategic infrastructure within the meaning of Section 37A and the application for approval of the Proposed Wind Farm should be made to KCC.

2.7.3.3 Community Consultation

The Community Liaison Strategy for the Proposed Project was based around engaging with the local community in an open, honest and transparent manner with the aim to not only provide clear and understandable information but also to gain feedback to understand the views of the local community. This feedback and information was used to inform the design process.

To inform local residents about the Proposed Project, a project Community Liaison Officer (CLO) was appointed and an introductory information pack was delivered via door-door consultation to all householders within a c.2km radius of the area of the site, in November 2022. The information distributed to each household consisted of:

- A company brochure, which provided an overview on Enerco Energy and some general
- information about wind energy;
- A site location map;
- An overview map which divided the properties surrounding the site into 2 zones;
- A map highlighting the potential developable area which was under review at that time and the properties within each zone;
- Dedicated contact details (name, phone and email) for the community liaison officer (CLO) in relation to the project, along with a web address for the dedicated project website.
- All of the information sent to the local community was also made available for public viewing on the project information website.

The community consultation effort was led by Enerco Energy Ltd on behalf of Briskalagh Ltd. which is a project specific company.

Following the initial notification of the proposal to the local community, the CLO liaised with interested parties in helping them to understand the proposal and respond to any queries or concerns raised. As more project information became available, further consultations were organised, with the CLO attending in-person meetings with individuals to answer queries relating to the Proposed Project.

In May 2023 a project update was circulated. This included a letter and 13 Frequently Asked Questions (FAQs) from the CLOs interactions with the community, this was circulated to the original mailing list, which was updated accordingly following the initial consultation with the community, and updated throughout the entire consultation period.

In August 2023 correspondence was circulated, notifying the community about the dates and times of the first Public Information Exhibition to be held August 24th, in the Ballycallan Community Hall.

In September 2023, following the feedback from the first PIE, an updated set of FAQs was circulated with 14 additional FAQs which addressed the main concerns raised at the PIE.

In April 2024 an updated information pack was circulated, this included an updated site layout map and two zone maps showing the dwellings within 2km of the proposed turbines. This round of consultation

also notified the community about the dates and times of the second Public Information Exhibition to be held on May 28th, in the Ballycallan Community Hall.

In July 2024, following feedback from the community and KCC, a further design team review resulted in the removal of T08 from the proposal, reducing the overall number of turbines to 7. The removal of T08 increased the setback between Kilmanagh and the nearest proposed turbines thereby further reducing any potential impacts on residential visual amenity. An updated information pack was circulated to the updated mailing list showing the proposed 7 turbine layout and dwellings within 2km of the proposed turbines.

In September 2024, a further project update was provided to the community with a letter circulated notifying the community that the planning application for the Proposed Project would be submitted to Kilkenny County Council within two weeks, and a copy of the press notice text was enclosed. A leaflet was delivered by the CLO to all properties directly accessed off the Proposed Grid Connection underground cabling route notifying them about the project and providing some information of the proposed works associated with the underground cabling installation. The leaflet included an overview map of the Proposed Grid Connection underground cabling route and contact details for the CLO should any interested parties wish to discuss the proposal further.

Active engagement and consultation with the local community has taken place from an early stage during the pre-application phase of the Proposed Project. The consultation process has been an extremely valuable exercise and has provided a detailed, and enhanced understanding of the key issues and concerns of the local community, which have ultimately shaped the final project proposal. There is currently on-going consultation with the local community, and it is the intention of the applicant to continue with the consultation for the entire lifespan of the Proposed Project.

The development of the proposed Briskalagh Renewable Energy Development will provide an enduring economic benefit to the communities surrounding the Proposed Project, through the potential community benefit package for residents and community groups, employment during the construction and operation of the Proposed Project and through the annual rates payable to the local authority.

Please refer to the Community Engagement Report at **Appendix 2-1** of the EIAR for further details.

2.8 Cumulative Impact Assessment

The EIA Directive and associated guidance documents state that as well as considering any direct, indirect, secondary, transboundary, short, medium-, and long term, permanent and temporary, positive and negative effects of the project the description of likely significant effects should include an assessment of cumulative impacts that may arise. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to the project. 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 gather a comprehensive view of cumulative impacts on these environmental considerations and to inform the EIAR process being undertaken by the consenting authority, each relevant chapter within this EIAR includes a cumulative impact assessment where appropriate.

The potential for cumulative impacts arising from other projects has therefore been fully considered within this EIAR.

2.8.1 Methodology for the Cumulative Assessment of Projects

The potential cumulative impact of the Proposed Project and combined with the potential impact of other projects has been carried out with the purpose of identifying what influence the Proposed Project will have on the surrounding environment when considered collectively with approved and existing

projects and projects pending a decision from the planning authority and land-uses in the in the defined cumulative assessment study areas as set out in **Table 2-8** below.

The cumulative impact assessment of projects has three principle aims:

- To establish the range and nature of existing and approved projects within the cumulative impact study area of the Proposed Project.
- To summarise the relevant projects which have a potential to create cumulative impacts.
- To identify the projects that hold the potential for cumulative interaction within the context of the Proposed Project and discard projects that will neither directly nor indirectly contribute to cumulative impacts. (Note: this is done by individual competent experts with respect to their specialist area of expertise.)

Projects were identified through a search of relevant online planning registers and effects were considered following a review of associated EIARs.

2.8.2 Cumulative Study Area

Table 2-8 below details the cumulative assessment study areas, relative to the Proposed Project, which are considered in this EIAR. Following consultation with the EIAR team on each individual topic, the maximum geographical extent where there is potential for in combination effects/cumulative impact, and justification for this extent was established and is presented below.

Table 2-8: Cumulative Study Areas and Justifications

Individual Topic	Maximum Extent	Justification
Population & Human Health	Shadow Flicker Study Area (10xRD buffer from proposed turbines) Electoral Divisions where the Proposed Wind Farm site is located (i.e. Ballycallan, Kilmanagh, Tullaroan). Consideration for the Population & Human Health cumulative extent is also given to the Air Quality, Climate, Noise and Landscape & Visual (i.e. Residential Visual Amenity) Cumulative Study areas	For the assessment of cumulative shadow flicker, any other existing, permitted or proposed wind farms are considered where their ten times rotor diameter shadow flicker study area are located within the Shadow Flicker Study Area of 1.63km (ten times the rotor diameter from proposed turbines) for the Proposed Wind Farm. As the ten times rotor diameter area for the nearest proposed, permitted or existing wind farms is outside of this 1.63km area of the proposed turbines, there is no potential for cumulative shadow flicker effects. The Study Area for Population is identified in Section 5.3.1 in Chapter 5 as the Electoral Divisions where the Proposed Wind Farm site is located (i.e. Ballycallan, Kilmanagh, Tullaroan).
Biodiversity - Flora and Fauna	**Proposed Project** The hydrological sub-catchment Munster_SC_010 **Proposed Wind Farm** 1km from the Proposed Wind Farm site **Proposed Grid Connection**	To capture other projects within the same hydrological subcatchments within which the Site is located. Using the precautionary approach and given the nature and scale of the Proposed Project, the geographical boundary for terrestrial ecological aspects, i.e. habitats, is 1km for cumulative assessment for the Wind Farm site and 200m from the Proposed Grid Connection underground electrical cabling route.

Individual Topic	Maximum Extent	Justification
	200m from the Proposed Grid Connection underground electrical cabling route Consideration for the Biodiversity cumulative extent is also given to the Bats, Birds and Water Cumulative geographical boundaries.	
Biodiversity - Birds	25km from the proposed turbines for large infrastructural development, such as wind farms, energy and public transport developments	NatureScot guidance '*Assessing the Cumulative Impacts of onshore Wind Energy Developments*' (SNH, 2012; 2018) was consulted while undertaking the cumulative assessment. SNH (2012; 2018) emphasises that its priority is to '*maintain the conservation status of the species population at the national level.*' However, it is acknowledged that consideration should also be allowed for impacts at the regional level '*where regional impacts have national implications (for example where a specific region holds the majority of the national population)*'. Following the guidance of SNH (2012), the cumulative impact assessment has been carried out at the scale of the importance rating of the receptor. A 25km radius of the Proposed Wind Farm turbines was considered a reasonable approximation of the size of a county and a 25km radius of the Proposed Wind Farm turbines was considered a reasonable approximation for the local level.
Biodiversity - Bats	10km from the Proposed Turbines	A 10km buffer of the proposed turbines is used as is recommended for the desktop study and cumulative assessment by NatureScot Guidelines 2021 (Section 4).
Land, Soils and Geology	EIAR Site Boundary	As there is no pathway for offsite cumulative impacts for Land, Soils and Geology, the cumulative study area is the EIAR Site Boundary
Hydrology & Hydrogeology	**Proposed Wind Farm** Hydrological sub-catchment Munster_SC_010 and Kilmanagh Gravels GWB **Proposed Grid Connection:** Within a 200m buffer zone of the proposed underground electrical cabling connection route.	The hydrological cumulative study area is delineated as follows: The mapped extent of the Kilmanagh Gravels GWB; A quantitative assessment based on flow volumes obtained from the EPA HydroTool Nodes downstream of the Proposed Wind Farm site. This assessment concludes that the due to dilution no hydrological cumulative effects will occur beyond EPA Hydrotool Node 15_1733 on the King's River immediately upstream of Callan. At this location the King's River has a total upstream catchment area of 20,000ha. There will be no potential for cumulative effects beyond this cumulative study area due to increases in flow volumes (as the catchment area increases) and increasing distance from the Proposed Wind Farm site.

Individual Topic	Maximum Extent	Justification
		A further assessment has been completed within a 200m zone of the Proposed Grid Connection. Due to the shallow nature of the underground cabling connection trench, a 200m buffer zones is an appropriate scale when considering potential cumulative effects on the water environment.
Air Quality	**Proposed Wind Farm:** Air Quality Study Area is 1km from Proposed Wind Farm site. **Proposed Grid Connection:** 500m from Grid Connection underground electrical cabling route.	Given dust particles do not generally travel greater than 500m from source (*Guidance on the Assessment of Mineral Dust Impacts for Planning*, IAQM 2016) the geographical boundary for the cumulative dust impact is 500m. In line with the TII Publication Air Quality Assessment of Proposed National Roads – Standard PE-ENV-01107, December 2022, a geographical boundary of 1km was used for cumulative air quality assessment.
Climate	The Climate assessment has been considered on a national basis and not confined to a specific study area.	The Climate assessment has considered the cumulative effects of the Proposed Project with other developments on a national basis under the relevant national Sectoral Emissions Ceilings.
Noise and Vibration	**Proposed Wind Farm:** The list of wind farms which were considered in cumulative assessment extended to 6 km from the proposed turbines **Proposed Grid Connection:** 200m from Grid Connection underground electrical cabling route.	The geographical boundary for the cumulative noise assessment is the area within which noise levels from the proposed, consented and existing wind turbine(s) may exceed 35 dB LA90 at up to 10 m/s wind speed (Institute of Acoustics document *Good Practice Guide To The Application Of Etsu-R-97 For The Assessment And Rating Of Wind Turbine Noise*). As the nearest proposed, permitted or existing wind farm is greater than 6km from the proposed turbines, there is no potential for cumulative noise effects. Due to the narrow nature of the underground electrical cabling route trench (~0.6m wide), a 200m buffer zone is an appropriate scale when considering potential cumulative noise effects
Cultural Heritage	**Proposed Wind Farm:** 20km buffer from proposed turbines **Proposed Grid Connection:** 200m from Grid Connection underground electrical cabling route.	Cumulative impacts on setting are more likely to occur at the operational stage of the development (i.e. post-construction). In this regard in order to assess overall cumulative effects on archaeology and cultural heritage the Proposed Project is considered in the context of other developments, in particular other permitted and proposed wind farms within 20km of the Proposed Wind Farm turbines. Direct effects for the Proposed Project are considered to be confined to within the EIAR Site Boundary and relate to construction effects. Due to the narrow nature of the Proposed Grid Connection underground cabling route trench, a 200m buffer zone is an appropriate scale when considering potential cumulative noise effects

Individual Topic	Maximum Extent	Justification
Landscape & Visual	20km from proposed turbines for visual and landscape effects. 15km from proposed turbines for effects on landscape character.	The Guidelines require that *"in areas where landscapes of national or international renown are located within 25 km of a proposed wind energy development, the Zone of Theoretical Visibility should be extended as far (and in the direction of) that landscape".* There are no landscapes of national or international renown within 25km of the Proposed Wind Farm, and therefore the cumulative boundary for visual and landscape effects is reduced to 20km from the Proposed turbines. The Landscape Character Areas (LCA) study area has been chosen as 15 kilometres for effects on landscape character. Through experience conducting LVIA for other wind energy development projects, the assessment team determined that no significant effects on landscape character are likely to arise beyond distances of 15km from the proposed turbines. Therefore, a LCA Study Area of 15km is deemed appropriate for effects on landscape character in relation to the assessment of effects upon designated Landscape Character Areas.
Material Assets: Traffic & Transport	**Proposed Wind Farm:** 25km buffer from proposed turbines for large infrastructural developments such as wind farms, energy and public transport developments. Following that, the proposed transport route for each project is considered. **Proposed Grid Connection:** 200m from Grid Connection underground electrical cabling route	Informed by traffic modelling scenario and the area of influence the Proposed Project has on changing traffic volumes. The potential cumulative traffic effects with the Proposed Project are assessed on the following criteria; • Project status (proposed to operational) • Degree of overlap with the Proposed Project delivery highway network (low to high) • Traffic volumes (low to high) The geographical boundary for the traffic and transport cumulative assessment is defined by the potential for other projects to overlap with the Proposed Project delivery highway network, and so a 25km buffer from turbines and 200m buffer from the proposed underground electrical cabling route is deemed appropriate to capture other plans and projects with the potential for cumulative effects with the Proposed Project. Please refer to Chapter 15 Material Assets for further details on the cumulative assessment methodology.

To gather a comprehensive view of cumulative impacts within the cumulative study area and to inform the EIA process being undertaken by the consenting authority, each relevant chapter within the EIAR addresses the potential for cumulative effects where appropriate and within the context of their identified cumulative study area. A long list of projects considered (i.e. the largest cumulative study boundary of 25km list) across all disciplines in their cumulative impact assessment is included in **Appendix 2-3**.

There are five potential wind farm developments referenced in the cumulative long list and included in **Table 2-5**, above, that are currently at pre-application stage. Three of these wind farms have sufficient information available (approximate turbine locations and tip height) in the public realm to allow them to be considered in the cumulative impact assessments for the topics where the developments fall within the

relevant study areas. Details for two of these projects, Killoshulan and Fassa Wind Farms, are not yet available in the public realm and, therefore, they have been excluded from consideration in the cumulative impact assessment for each topic.

2.8.2.1 Other Developments/Land Uses

The review of the relevant County Council planning registers documented relevant general development planning applications in the vicinity of the Site, the majority of which relate to the provision and/or alteration of one-off rural housing and the provision of agricultural buildings. These applications and land uses have also been taken account in describing the baseline environment and in the relevant assessments.

Furthermore, the cumulative impact assessments carried out in each of the subsequent chapters of this EIAR consider all potential significant cumulative effects arising from all land uses in the vicinity of the Proposed Project. These include permitted and existing wind farms in the area, solar farms, energy storage, ongoing agricultural practices/forestry practices, quarries and extractive industries, intensive production/ processing industries, large infrastructure projects and other EIAR projects. The OPW (www.floodinfo.ie) does not record the presence of any Arterial Drainage Schemes or Benefited Lands within the Site.

2.8.2.2 Summary

The cumulative impact assessments carried out in each of the subsequent chapters of this EIAR consider all potential significant cumulative effects arising from relevant projects and land uses within the cumulative study area. These include ongoing agricultural and forestry practices.

Overall, the Proposed Project has been designed to avoid and mitigate impacts on the environment and a suite of mitigation measures is set out within the EIAR. The mitigation measures set out in this EIAR will ensure that significant cumulative effects do not arise during the construction, operational or decommissioning phases of the Proposed Project. Additional detail in relation to the potential significant cumulative effects arising and, where appropriate, the specific suite of relevant mitigation measures proposed are set out within each of the relevant chapters of this EIAR.