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Environmental Impact Assessment Report

Briskalagh Renewable
Energy Development, Co.
Kilkenny

Chapter 1 - Introduction



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Table of Contents

1.	INTRODUCTION.....	1-1
1.1	Introduction.....	1-1
1.1.1	References to the Proposed Project.....	1-1
1.1.2	Proposed Site Location	1-2
1.2	Legislative Context of Environmental Impact Assessment.....	1-3
1.2.1	EIAR Guidance.....	1-4
1.2.2	Wind Energy Development Guidelines for Planning Authorities.....	1-4
1.3	The Applicant	1-5
1.4	Brief Description of the Proposed Project.....	1-5
1.5	Need for the Proposed Project	1-7
1.5.1	Overview.....	1-7
1.5.1.1	Climate Change and Greenhouse Gas Emissions	1-8
1.5.2	Energy Security.....	1-10
1.5.2.1	REPowerEU.....	1-11
1.5.3	Increasing Energy Consumption.....	1-12
1.5.4	Reduction of Carbon Emissions and Other Greenhouse Gases	1-15
1.5.5	Economic Benefits	1-16
1.5.5.1	Employment potential.....	1-17
1.5.5.2	Commercial Rates	1-17
1.6	Purpose and Scope of the EIAR.....	1-17
1.7	Structure and Content of the EIAR	1-18
1.7.1	General Structure	1-18
1.7.2	Description of Likely Significant Effects and Impacts.....	1-19
1.8	Project Team	1-22
1.8.1	Project Team Responsibilities	1-22
1.8.2	Project Team Members.....	1-24
1.8.2.1	MKO	1-24
1.8.2.2	Hydro Environmental Services Ltd	1-31
1.8.2.3	DANU Engineering Consultancy	1-32
1.8.2.4	AWN Consulting	1-32
1.8.2.5	Tobar Archaeological Services.....	1-33
1.8.2.6	Alan Lipscombe Traffic and Transport Consultants	1-33
1.9	Difficulties Encountered.....	1-34
1.10	Viewing and Purchasing of the EIAR	1-34

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1. INTRODUCTION

1.1 Introduction

This Environmental Impact Assessment Report (EIAR) has been prepared by MKO on behalf of the applicant, Briskalagh Ltd. who intends to apply to Kilkenny County Council (KCC) for planning permission to construct a renewable energy development comprising 7 no. wind turbines, and associated infrastructure in the townlands of Briskalagh and adjacent townlands, near Kilmanagh in Co. Kilkenny, and a 38kV on-site substation and associated works, including underground 38kV cabling to connect to the national grid at Ballyragget 110kV substation, in the townland of Moatpark, Co. Kilkenny.

Full details of the pre-application consultation undertaken with regards both planning applications can be found in Section 2.7.3 in Chapter 2 of this EIAR

1.1.1 References to the Proposed Project

The Proposed Project, will be known as the 'Briskalagh Renewable Energy Development'.

For the purposes of this EIAR:

- Where the 'Proposed Project' is referred to this encompasses the entirety of the project for the purposes of this EIA in accordance with the EIA Directive. The Proposed Project is described in detail in Chapter 4 of this EIAR.
- Where the 'Proposed Wind Farm' is referred to, this refers to turbines and associated foundations and hard-standing areas, meteorological mast, access roads, temporary construction compounds, underground cabling, borrow pit, spoil management, site drainage, biodiversity enhancement and all ancillary works and apparatus. The Proposed Wind Farm is described in detail in Chapter 4 of this EIAR.
- Where the 'Proposed Grid Connection' is referred to, this refers to the 38kV onsite substation, associated temporary construction compound and 38kV underground cabling connecting to the existing Ballyragget 110kV substation, and all ancillary works and apparatus. The Proposed Grid Connection is described in detail in Chapter 4 of this EIAR.
- Where the 'Site' is referred to, this relates to the primary study area for the EIAR, as delineated by the EIAR Site Boundary in green as shown on Figure 1-1 of the EIAR and encompasses an area of approximately 1,000 hectares.
- Where the 'Proposed Wind Farm site' is referred to, this refers to the portion of the Site surrounding the Proposed Wind Farm but excluding the portion of the Site surrounding the Proposed Grid Connection underground cabling route.

This EIAR, along with a Natura Impact Statement ('NIS'), will accompany the planning application for the Proposed Project which will be made to KCC. Both the EIAR and NIS contain the information necessary for KCC to complete the Environmental Impact Assessment and Appropriate Assessment as required for this planning application.

Both the EIAR and NIS take into account the combined impacts of these individual elements of the Proposed Project.

For clarity in this EIAR, all elements of the Proposed Project will be assessed cumulatively and in combination with other projects to aid the competent authority in carrying out an EIA.

The EIAR Site Boundary identifies the primary EIAR study area for the Proposed Project, however, each individual topic, i.e. chapter, has its own study area for assessment purposes relevant to that topic which will be clearly identified in the relevant chapters of this EIAR. The actual planning application site outline (Red Line Boundary) for the purposes of this planning application occupies a smaller area within the primary EIAR Site Boundary. The permanent footprint of the Proposed Project measures approximately 8.75 hectares, which represents approximately 0.875% of the Site.

The Proposed Project is described in detail in Chapter 4 of this EIAR.

1.1.2

Proposed Site Location

The Proposed Wind Farm is located within a rural, agricultural setting in northwest Kilkenny, approximately 8.5km west of Kilkenny City. The settlement of Kilmanagh is located approximately 1.2km south of the nearest proposed turbine, and the settlement of Tullaroan is located approximately 2.7km north of the nearest proposed turbine. The R695 regional road runs immediately south of the Site in an east-west orientation entering the settlement of Kilmanagh and then heading south from Kilmanagh towards Callan, passing within 1.3km of the nearest proposed turbine. Existing access is via farm entrances off the L5023 local road to the northwest, L5024 to the north, and L1009 to the south. The Site is traversed by a number of existing agricultural roads and tracks. The Site location context is shown in Figure 1-1. The Site measures approximately 1,000 hectares. and falls within the townlands listed in below in Table 1-1.

Landuse within the Site currently comprises a mix of pastoral agriculture and small-scale, private forestry. The surrounding land uses predominantly comprise pastoral agriculture and residential within Kilmanagh and Tullaroan.

The Site is located within an area designated in the Draft Kilkenny County Development Plan 2021-2027 as an 'Acceptable in Principle' and 'Open for Consideration' for wind energy development. It is noted that the Kilkenny County Development Plan has been subject to a ministerial direction and, in accordance with Section 31(4) of the Planning and Development Act 2000, the Wind Strategy Areas within the KCDP shall be taken as not having come into effect.

Table 1-1 Townlands within which the Proposed Project is located.

Proposed Project	Project Component	Townlands within the EIAR Site Boundary
	Proposed Wind Farm	Briskalagh, *Bansa Glebe, *Ballagh, *Ballaghcloneen, Ballycuddihy, Coolnapisha, Kilmanagh, Knockeenglass, Oldtown, Oldtownhill and *Riesk.
	Proposed Grid Connection	Oldtown, Huntstown, Tullaroan, Brittas, Rathealy, Picketstown, Monavadroe, Ballyroe (Maher), Ballyroe (Grace), Ballyroe, Sart, Curraghduff, Knockown, Boherkyle, Freshford, Upperwood Desmesne, Tobernapeastia, Freshford Lots, Monabrika, Baunaniska, Graigueswood, Moneenaun, Clone, Acragar, Sweethill, Grange, Parksgrove, Ballyconra, *Ballyragget and Moatpark

*Townlands located within EIAR boundary, but not within planning application boundary

Legislative Context of Environmental Impact Assessment

The consolidated European Union Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment (the 'EIA Directive'), has been transposed into Irish planning legislation by the Planning and Development Act 2000 as amended and the Planning and Development Regulations 2001 as amended. Directive 2011/92/EU was amended by Directive 2014/52/EU which has been transposed into Irish law with the recent European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018). Most of the provisions of the new regulations came into operation on the 1st of September 2018 with a number of other provisions coming into operation on the 1st of January 2019.

This EIAR complies with the EIA Directive 2011/92/EU as amended by Directive 2014/52/EU.

The Environmental Impact Assessment (EIA) will be undertaken by Kilkenny County Council, as the competent authority.

Article 5 of the EIA Directive 2011/92/EU as amended by Directive 2014/52/EU provides where an EIA is required, the developer shall prepare and submit an environmental impact assessment report (EIAR). The information to be provided by the developer shall include at least:

1. *a description of the project comprising information on the site, design, size and other relevant features of the project;*
- a) *a description of the likely significant effects of the project on the environment;*
- b) *a description of the features of the project and/or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;*
- c) *a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment;*
- d) *a non-technical summary of the information referred to in points (a) to (d); and*
- e) *any additional information specified in Annex IV relevant to the specific characteristics of a particular project or type of project and to the environmental features likely to be affected.*

In addition, Article 94 of the Planning and Development Regulations 2001 (as amended) sets out the information to be contained in an EIAR, with which this EIAR complies.

MKO was appointed as environmental consultant on the Proposed Project and commissioned to prepare this EIAR in accordance with the requirements of the EIA Directive 2011/92/EU as amended by Directive 2014/52/EU.

Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended, identifies classes and scales of development that require Environmental Impact Assessment (EIA). The relevant class of development in this case relates to "installations for the harnessing of wind power for energy production (wind farms) with more than 5 turbines or having a total output greater than 5 megawatts", as per Item 3(i) of the Schedule. The Proposed Project exceeds 5 Megawatts in scale and proposes more than 5 turbines, and therefore is subject to EIA.

The EIAR provides information on the receiving environment and assesses the likely significant effects of the proposed project on it and proposes mitigation measures to avoid or reduce these effects. The function of the EIAR is to provide information to allow the competent authority to conduct the EIA of the proposed project.

All elements of the Proposed Project, i.e. the Proposed Wind Farm and Proposed Grid Connection have been assessed as part of this EIAR.

1.2.1 EIAR Guidance

The Environmental Protection Agency (EPA) published its *'Guidelines on the Information to be Contained in Environmental Impact Assessment Reports'* (EPA, 2022) in May 2022, which is intended to guide practitioners preparing an EIAR in line with the requirements set out in the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018).

In preparing this EIAR regard has also been taken of the provisions of the *'Guidelines for Planning Authorities and An Bord Pleanála on Carrying out Environmental Impact Assessment'*, published by the Department of Housing, Planning and Local Government (DHPLG) in August 2018 to the extent these guidelines are relevant having regard to the enactment of the revised EIA Directive.

The European Commission also published a number of guidance documents in December 2017 in relation to Environmental Impact Assessment of Projects (Directive 2011/92/EU as amended by 2014/52/EU) including *'Guidance on Screening'*, *'Guidance on Scoping'* and *'Guidance on the preparation of the Environmental Impact Assessment Report'*. MKO has prepared the EIAR in accordance with these guidelines also.

1.2.2 Wind Energy Development Guidelines for Planning Authorities

The relevant considerations under the *'Wind Energy Development Guidelines for Planning Authorities'* (Department of the Environment, Heritage and Local Government (DOEHLG), 2006) have been taken into account during the preparation of this EIAR.

The *'Wind Energy Development Guidelines for Planning Authorities'* (DoEHLG, 2006) (hereafter referred to as the Guidelines) were the subject of a targeted review. The proposed changes to the assessment of impacts associated with onshore wind energy developments were outlined in the document Draft Wind Energy Development Guidelines (December 2019) (hereafter referred to as the draft Guidelines). A consultation process in relation to the draft Guidelines closed on 19th February 2020. The proposed changes presented in the draft Guidelines give certain focus on the setback distance from residential properties (four times the proposed maximum tip height), along with shadow flicker and noise requirements relative to sensitive receptors.

At time of writing, the draft Guidelines have not yet been adopted, and the relevant guidelines for the purposes of section 28 of the Planning and Development Act 2000, as amended, remain to be the Guidelines. Notwithstanding this, however, due to the timelines associated with the planning process for renewable energy projects and the commitment within the Climate Action Plan 2023 to publish new draft guidelines in 2023 and final new guidelines in 2024 (refer to Section 1.5.1.1 below), it is possible that the draft Guidelines may be adopted during the consideration period for the current planning application. Should the draft Guidelines be adopted in advance of a planning decision being made on this application, the Proposed Wind Farm will be capable adhering to the relevant noise and shadow flicker standards. While the final updated 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. The Proposed Wind Farm achieves the recommended distance of 4 times turbine tip height from proposed turbines to third party sensitive receptors, which has become a recognised standard for the purposes of protecting residential visual amenity, as currently outlined in the draft Guidelines.

1.3

The Applicant

The applicant for the Proposed Project, Briskalagh Ltd, is an associated company of Enerco Energy Ltd., which is an Irish-owned, Cork-based company with extensive experience in the design, construction and operation of wind energy developments throughout Ireland, with projects currently operating or in construction in Counties Cork, Kerry, Limerick, Clare, Galway, Mayo and Donegal.

By Q3 2024, Enerco associated companies had over 875 Megawatts (MW) of wind generating capacity in commercial operation or in construction, with a further c.400MW of projects at various stages in its portfolio to assist in meeting Ireland's renewable energy targets.

1.4

Brief Description of the Proposed Project

The Proposed Project will comprise the construction of 7 no. wind turbines with an overall blade tip height of 185 metres and all associated works, and a 38 kV substation and associated works, including underground 38kV cabling to connect to the national grid at Ballyragget 110kV substation. The full description of the Proposed Project is detailed in Chapter 4 of this EIAR.

The development description for the current planning application as it appears in the public notices is as follows:

The development will consist of the provision of the following:

- i. 7 no. wind turbines with an overall turbine tip height of 185 metres; a rotor blade diameter of 163 metres; and hub height of 103.5 metres, and associated foundations and hard-standing areas;*
- ii. A permanent 38kV substation compound (control building with welfare facilities, all associated electrical plant and apparatus, security fencing, underground cabling, storage containers, wastewater holding tank, site drainage and all ancillary works);*
- iii. Permanent underground electrical (38kV) and communications cabling to the existing Ballyragget 110kV substation in the townland of Moatpark (including joint bays, communication and earth sheath link chambers and all ancillary works along the route). This cabling route is primarily located within the public road corridor which includes a Protected Structure (Kilkenny RPS Ref. C886);*
- iv. Underground electrical (33kV) and communications cabling connecting the wind turbines and meteorological mast to the on-site substation;*
- v. 3 no. temporary construction compounds (including site offices and welfare facilities);*
- vi. A meteorological mast with a height of 30 metres, security fencing and associated foundation and hard-standing area;*
- vii. A new temporary site entrance on the L1009;*
- viii. A new gated site entrance on the L5024;*
- ix. Upgrade of existing site tracks/roads and provision of new site access roads, junctions and hardstand areas;*
- x. A borrow pit;*
- xi. Spoil Management;*
- xii. Tree felling and hedgerow removal;*
- xiii. Biodiversity Management and Enhancement Plan measures (including establishment of a riparian buffer and hedgerow enhancement);*
- xiv. Site Drainage;*
- xv. Operational Stage site signage; and*
- xvi. All ancillary works and apparatus.*

The application is seeking a ten-year planning permission. Current and future wind turbine generator technology will ensure that the wind turbine model, chosen for the Proposed Project, will have an

operational lifespan greater than the 35-year operational life that is being sought as part of the planning application.

Modern wind turbine generators currently have a potential generating capacity in the 4 to 7 MW range, with the generating capacity continuing to evolve upwards as technology improvements are achieved by the turbine manufacturers. For the purposes of this EIAR it is assumed that the wind turbine model installed as part of the Proposed Project will have an generating capacity of 7MW. Therefore, on this basis, the proposed 7 no. wind turbines would have a combined generating capacity of 49MW. The actual turbine procured as part of a competitive tender process may have a generating potential that is marginally lower or greater than the 7MW turbine described in the EIAR. Irrespective of the power output of the actual turbine procured, the conclusions of the EIAR will not be materially affected.

The layout of the Proposed Project has been led by consideration of constraints and facilitators, thereby avoiding the environmentally sensitive parts of the Site. The roads layout for the Proposed Wind Farm makes the use of the existing onsite access roads and tracks where possible, with approximately 1.8 kilometres of existing roadway/ tracks requiring upgrading and approximately 6 kilometres of new access road to be constructed.

A general construction entrance will be constructed off the L-5024 at the north of the Site. This entrance will be used as the main entrance for construction traffic throughout the construction phase. Appropriate sightlines will be established at the proposed Site entrance for the safe egress of traffic during the construction phase. On completion of the construction phase, this Site entrance will be reduced in size and gated for security, and will be used as the operational Site entrance.

A temporary access road will be constructed off the L-1009 in the south of the Site. This will facilitate the delivery of abnormal loads and concrete deliveries for the turbine foundations. This new temporary entrance was subject to autotrack assessment to identify the turning area required, as described in Chapter 15, Section 15.2 of the Traffic and Transport Assessment. Appropriate sightlines will be established to the east and west of the temporary access road for the safe egress of traffic. Following the turbine commissioning, this entrance will be reinstated. This turbine component entrance will not be used for general construction traffic, or HGV deliveries (excepting concrete deliveries).

1.5

Need for the Proposed Project

1.5.1

Overview

In July 2021, the Climate Action and Low Carbon Development (Amendment) Act 2021 was signed into law, committing Ireland to reach a legally binding target of net-zero emissions no later than 2050, and a cut of 51% by 2030 (compared to 2018 levels). On this pathway to decarbonisation, the Government published the Climate Action Plan 2024¹ reaffirming the renewable electricity target of 80% by 2030, without compromising security of energy supply. The Proposed Project is expected to be operational before 2030 and would therefore contribute to this 2030 target.

In July 2023, the EPA² report stated a provisional total of national greenhouse gas emissions in 2022 to be 60.76 million tonnes carbon dioxide equivalent (MtCO₂eq) which is 1.9% lower (or 1.19 Mt CO₂eq) than emissions in 2021 (61.95 MtCO₂eq) and follows a 5.1% increase in emissions reported for 2021. Emissions are 0.5% lower than pre-pandemic 2019 figures. In 2022, the energy industries, transport and agriculture sectors accounted for 74.1% of total GHG emissions. Agriculture is the single largest contributor to the overall emissions, at 38.4%. Transport, energy industries and the residential sector are the next largest contributors, at 19.1%, 16.6% and 10.0%, respectively. The report also states that there was a substantial reduction in coal, oil and peat used in electricity generation (-16%, -29% and -25% respectively), and renewables increased from 35% in 2021 to 39% in 2022. The report highlights that whilst emissions are beginning to reduce, transformative measures will be needed to meet National Climate ambitions.

As such, the Proposed Project is critical to helping Ireland address these challenges as well as addressing the country's over-dependence on imported fossil fuels.

The need for the Proposed Project is driven by the following factors:

1. *A legal commitment from Ireland to limit greenhouse gas emissions under the Kyoto protocol to reduce global warming;*
2. *A requirement to increase Ireland's national energy security as set out in Ireland's Transition to a Low Carbon Energy Future 2015-2030.*
3. *Climate Action Plan 2023 which aims to ensure that Ireland achieves its legally binding target (the Climate Action and Low Carbon Development (Amendment) Act 2021) of net-zero greenhouse gas emissions no later than 2050, and a reduction of 51% by 2030.*
4. *Increasing energy price stability in Ireland through reducing an over reliance on imported fossil fuels.*
5. *Provision of cost-effective power production for Ireland which would deliver local benefits; and*
6. *To facilitate the Government in meeting its ambitious 80% renewable energy target by 2030.*

These factors are addressed in further detail below. Sections 2.2 and 2.3 in Chapter 2 of this EIAR on Background to the Proposed Project, presents a full description of the international and national renewable energy policy context for the Proposed Project. Section 2.4 addresses climate change, including Ireland's current status with regard to meeting greenhouse gas emission reduction targets.

¹ Department of Environment, Climate and Communications (2023) Climate Action Plan 2024

² Ireland's Provisional Greenhouse Gas Emissions (1990-2022) <https://www.epa.ie/publications/monitoring-assessment/climate-change/air-emissions/2023-EPA-Provisional-GHG-Report_Final_v3.pdf>

1.5.1.1 Climate Change and Greenhouse Gas Emissions

At the Paris climate conference (COP21) in December 2015, 195 countries adopted the first-ever universal, legally binding global climate deal the Paris Agreement. The Paris Agreement sets out a global action plan to avoid dangerous climate change by limiting global warming to well below 2°C above pre-industrial levels. Under the Paris Agreement, the EU and Governments also agreed on the need for global emissions to peak as soon as possible but recognised that this will take longer for developing countries to achieve. The most recent climate conference (COP28) in December 2023 in Dubai resulted in the first agreement explicitly calling for the transition away from fossil fuels, the United Arab Emirates (UAE) Consensus. This text raised concerns over the achievement of limiting warming below 1.5°C, as the text to ‘phase out as soon as possible inefficient fossil fuel subsidies’ does not address energy poverty or the just transition. The UAE Consensus further calls for more explicit near-term goals in the lead up to 2050, calling for the world to cut greenhouse gas emissions by 43% as compared to 2019 levels.

In March 2021 the government approved the Climate Action and Low Carbon Development (Amendment) Bill which provide plans to facilitate the ‘transition to a climate resilient and climate neutral economy by the end of year 2050’³ and includes for a 51% reduction in emissions by 2030. Furthermore, government approval was given in February 2021 to draft amendments to the Petroleum and Other Minerals Development Act 1960 which will give statutory effect to ending the issuing of new licences for the exploration and extraction of gas. The Bill, entitled an Act, was passed into law in July 2021 and will manage the implementation of a suite of policies to assist in achieving a 7% average yearly reduction in overall greenhouse gas emissions over the next decade.

The Climate Action and Low Carbon Development (Amendment) Act 2021 also outlines the obligations of An Bord Pleanála and/or local authority in assisting the country reach these targets. Section 15 of the Act states as follows:

‘Section 15. F33 (1) A relevant body shall, in so far as practicable, perform its functions in a manner consistent with—

- a) the most recent approved climate action plan,*
- b) the most recent approved national long term climate action strategy,*
- c) the most recent approved national adaptation framework and approved sectoral adaptation plans,*
- d) the furtherance of the national climate objective, and*
- e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.’*

In February 2022, the International Panel on Climate Change (IPCC) released the report ‘Working Group II-Climate Change 2022: Impacts, Adaptation and Vulnerability’⁴ regarding the impacts of climate change on nature and human activity. The report states that global warming of 1.5°C and 2°C will be exceeded during the 21st century unless deep reductions in CO₂ and other greenhouse gas emissions occur in the coming decades. the report identifies four key risks for Europe with most becoming more severe at 2 °C global warming levels (GWL) compared with 1.5 °C GWL. From 3°C GWL, severe risks remain for many sectors in Europe. The four key risks identified are:

- 1) Key Risk 1: Mortality and morbidity of people and changes in ecosystems due to heat
- 2) Key Risk 2: Heat and drought stress on crops
- 3) Key Risk 3: Water scarcity

³Rialtas na hÉireann 2021. Climate Action and Low Carbon Development (Amendment) Bill 2021 <https://www.gov.ie/en/publication/984d2-climate-action-and-low-carbon-development-amendment-bill-2020/>

⁴ Climate Change 2022: Impacts, Adaptation and Vulnerability. Working Group II Contribution to the IPCC Sixth Assessment Report. Available at: https://www.ipcc.ch/report/ar6/wg2/downloads/report/IPCC_AR6_WGII_SummaryForPolicymakers.pdf

4) Key Risk 4: Flooding and sea level rise

In April 2022, the IPCC released the report ‘Working Group-III – Climate Change 2022: Mitigation of Climate Change’, which assesses literature on the scientific, technological, environmental, economic and social aspects of mitigation of climate change. The report reflects new findings in the relevant literature and builds on previous IPCC reports, including the WGIII contribution to the IPCC’s Fifth Assessment Report (AR5), the WGI and WGII contributions to Sixth Assessment Report (AR6) and the three Special Reports in the Sixth Assessment cycle. This report outlines developments in emission reduction and mitigation efforts, assessing the impact of national climate pledges in relation to long-term emissions goals in a global context.; and states that *“Unless there are immediate and deep emissions reductions across all sectors, limiting global warming to 1.5°C will be beyond reach.”*

In November 2023, the IPCC published the ‘AR6 Synthesis Report: Climate Change 2023’⁵, and is the final product of the AR6 of the IPCC. It summarizes the state of knowledge of climate change, its widespread impacts and risks, and climate change mitigation and adaptation. It confirms that the unsustainable and unequal energy and land use as well as historical use of fossil fuels have unequivocally caused global warming, with global temperatures approximately 1.1°C above 1850-1900 levels. A substantial ‘emissions gap’ exists between global greenhouse gas emissions in 2030 associated with the implementation of NDCs announced prior to COP26, Parties to the Paris Agreement have two years to submit updated NDCs for the period up to 2035, ambition will need to be ratcheted up in order to limit warming to 1.5°C.

In June 2023, the EPA⁶ reported, for the 2021 year, that the energy sector contributed to 17% of Ireland’s total emissions. Under a With Existing Measures (WEM) scenario, emissions from the energy industries sector are projected to decrease by 50% from 10.3 to 5.2 MtCO₂eq; under a With Additional Measures (WAM) scenario, emissions from the energy sector are projected to decrease by 60% from 10.3 to 4.2 MtCO₂eq over the period 2021-2030.

The EPA ‘Ireland’s Provisional Greenhouse Gas Emissions 1990-2022’⁷ report stated that in 2022, overall electricity generation in Ireland increased by a 2.1% and renewable electricity generation increased from 35.0% in 2021 to 38.6%, mainly due to an increase in wind energy production of 14.6%. The increase in renewables, combined with decreases in coal, oil, and peat use, resulted in the emissions intensity of power generation in 2022 decreasing by 4.8%, 331 g CO₂/kWh compared with 348 g CO₂/kWh in 2021.

The ‘National Energy Projections 2023’⁸, published annually by the Sustainable Energy Authority of Ireland (SEAI), state that in 2022, 86% of all energy used in Ireland was from fossil fuels, 13% from renewable sources and the remainder from others such as waste and electricity imports. By 2030, fossil fuels could still provide most of Ireland’s energy, ranging from 68% in the WEM scenario to 57% in the most ambitious WAM scenario. The deployment of renewables needs to outpace the growth of energy demand for the absolute reductions in greenhouse gas emissions that are required to be met. However, the SEAI National Energy Projections show that by the end of the second budget period, the total exceedance in the electricity sector is projected to be 20.1 MtCO₂eq, or 33%, and 13.8MtCO₂eq, or 23%, in the WEM and WAM scenarios, respectively.

The 2024 Climate Action Plan (CAP)⁹ was published on the 20th of December 2023 by the Department of Communications, Climate Action and Environment (DoCCAE). Following on from Climate Action Plans 2019, 2021, and 2023, CAP 2024 sets out the roadmap to deliver on Ireland’s climate ambition. It

⁵ IPCC Sixth Assessment Synthesis Report, Intergovernmental Panel on Climate Change AR6 Report: Climate Change 2023

⁶ Ireland’s Greenhouse Gas Emission Projections 2022-2040 <https://www.epa.ie/publications/monitoring-assessment/climate-change/air-emissions/EPA-GHG-Projections-2022-2040_Finalv2.pdf>

⁷ Ireland’s Provisional Greenhouse Gas Emissions 1990-2022 (June 2023) <https://www.epa.ie/publications/monitoring-assessment/climate-change/air-emissions/2023-EPA-Provisional-GHG-Report_Final_v3.pdf>

⁸ SEAI National Energy Projections 2023 Report. <<https://www.seai.ie/publications/National-Energy-Projections-2023.pdf>>

⁹ Government of Ireland (2023) Climate Action Plan 2024 <https://www.gov.ie/en/publication/79659-climate-action-plan-2024/>

aligns with the legally binding economy-wide carbon budgets and sectoral ceilings that were agreed by Government in July 2022 following the Climate Action and Low Carbon Development (Amendment) Act 2021, which commits Ireland to a legally binding target of net-zero greenhouse gas emissions no later than 2050, and the reduction of 51% by 2030 mentioned above. The CAP sets out an ambitious course of action over the coming years to address the impacts which climate may have on Ireland's environment, society, economic and natural resources. This Plan clearly recognises that Ireland must significantly step up its commitments to tackle climate disruption. The CAP identifies the need to increase the share of electricity demand generated from renewable sources by to up to 80% where achievable and cost effective, without compromising security of electricity supply and a need for 9GW of onshore wind generation. Only 4.3GW is in place in Ireland as of May 2022, therefore Ireland needs to increase its installed capacity of wind generation. The CAP presents clear and unequivocal support for the provision of additional renewable energy generation and presents yet further policy support for increased wind energy.

CAP 2024 has set out the following targets for electricity generation and transmission:

- Share of electricity demand generated from **renewable sources to up to 80%** where achievable and cost effective, without compromising security of electricity supply;
 - Onshore Wind Capacity: up to 9GW
 - Offshore Wind Capacity: 5GW (minimum)
 - Solar PV Capacity: 8GW
- Green hydrogen production via 2 GW offshore wind (2031-2035 measure)
- Phase out and end the use of coal and peat in electricity generation;
- Ensure that 20-30% of system demand is flexible by 2030;
- Ensure electricity generation grid connection policies and regular rounds of connection offers which facilitate timely connecting of renewables, provides a locational signal and supports flexible technologies;

It is estimated that the Proposed Project, with an estimated installed capacity of 49MW (based on a 7MW turbine model) will result in the net displacement of approximately 31,578 tonnes of Carbon Dioxide (CO₂) per annum. The carbon offsets resulting from the Proposed Project are described in detail in Chapter 11 Climate.

1.5.2 Energy Security

At a national level, Ireland currently has one of the highest external dependencies on imported sources. In November 2023 the Department of the Environment, Climate and Communications (DECC) released '*Energy Security in Ireland to 2030*¹⁰ which states that '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 in Europe's energy systems. This report proposes a package of a wide range of measures to implement to 2030 to improve Ireland's energy security. Ireland is currently one of the most energy import dependent countries in the EU, having imported 77% of its energy supply in 2021 and 82% in 2022.¹¹ The '*Energy Security in Ireland to 2030*' report provides a roadmap to energy security in Ireland, on the basis of current energy policies and project and to implement the measures proposed as part of the energy security package. EirGrid in their '*All Island Generation Capacity Statement 2022 - 2031*' (October 2022), states that new wind farms commissioned in Ireland in 2021 brought total wind installed capacity to over 4,300MW, contributing to the overall RES-E percentage of 36.4% with wind energy accounting for 32.5%. Prior to 2015, Ireland's import dependency of energy was over 90% but dropped to 71% in 2016 with the Corrib gas field

¹⁰ Department of the Environment, Climate and Communications (2023) *Energy Security in Ireland to 2030*.
<<https://assets.gov.ie/276471/2d15ce6d-e555-4ada-a3cf-b325a5d7ba20.pdf>>

¹¹ Sustainable Energy Authority of Ireland (2023) *Key insights from SEAI's 2022 National Energy Balance*.
<<https://www.seai.ie/data-and-insights/seai-statistics/key-publications/national-energy-balance/Key-Insights-from-2022-National-Energy-Balance.pdf>>

starting production. Since 2018, Ireland's import dependency has been increasing as the output from the Corrib gas field reduces faster than we are adding new renewable sources.

In January 2024 the SEAI published their 'Energy in Ireland – 2023 Report'¹², stating that in 2022, 49.2% of the electricity generated indigenously in Ireland came from gas, with renewables accounting for a further 38.9%. Coal, oil, non-renewable wastes (NRW), and peat accounted for the remainder of electricity generation in Ireland. The overall renewable energy share for gross final energy consumption for 2022 was 13.1%. 2022 had the lowest energy-related emissions of any year in the last quarter century, except for 2020 which was heavily influenced by the COVID-19 lockdowns. The SEAI 'Energy in Ireland – 2023 Report', using early provisional data from January to September 2023, states that electricity emissions may be significantly reduced from 2022 levels in 2023 and the carbon intensity of the national grid may be down to 259 gCO₂/kWh, which, if achieved, will be the lowest carbon intensity value ever reached in Ireland.

Ireland continues to be hugely energy import-dependent leaving it exposed to large energy price fluctuations as a minimum and possibility of fuel shortages if a major energy crisis were to occur. The international fossil fuel market is growing increasingly expensive and is increasingly affected by international politics which can add to price fluctuations. This volatility will be increased as carbon prices increase in the future. This has implications for every Irish citizen.

The SEAI has stated that Ireland's heavy dependence on imported fossil fuels, "is a lost opportunity in terms of keeping this money here in Ireland and further developing our abundant renewable resources"¹³.

The cost of carbon credits is included in all electricity traded, and the price of electricity generated by coal is particularly vulnerable due to its high carbon emissions per unit of electricity generated. Coal and peat generate almost 5% of Ireland's electricity, while gas generates 51%. Climate Action Plan 2024 calls for a reduction of 75% in electricity related emissions to not exceed the carbon budget allocations. At a time when the energy system is under severe pressure to ensure security of supply, amid projections of rapid electricity demand growth over the coming decade, any steps to reduce Ireland's dependence on imported fossil fuels will add to financial autonomy and stability in Ireland. The use of Ireland's indigenous energy resources, such as wind, will contribute to a reduction in energy imports.

The Energy White Paper 2015¹⁴ (the White Paper) notes "There will be a substantial increase in the cost of carbon in the short and medium term, through the EU Emissions Trading Scheme". Any steps to reduce dependence on imported fossil fuels will add to financial autonomy and stability in Ireland. As the White Paper notes:

"In the longer term, fossil fuels will be largely replaced by renewable sources".

1.5.2.1 REPowerEU

In a Communication from the European Parliament on Joint European Action for more affordable, secure and sustainable energy¹⁵, the European Commission proposed an outline of a plan to make Europe independent from Russian fossil fuels well before 2030 in light of Russia's invasion of Ukraine. Commission President Ursula von der Leyen stated:

"We must become independent from Russian oil, coal and gas. We simply cannot rely on a supplier who explicitly threatens us. We need to act now to mitigate the impact of rising

¹² Sustainable Energy Authority Ireland (2024) Energy in Ireland – 2023 Report

¹³ Dr Eimear Cotter, Head of Low Carbon Technologies, SEAI - "Energy Security in Ireland 2015"

¹⁴ Ireland's Transition to a Low Carbon Energy Future 2015-2030 (Department of Communications, Energy & Natural Resources, 2015)

¹⁵ European Commission (March 2022) REPowerEU: Joint European Action for more affordable, secure and sustainable energy. Strasbourg. https://ec.europa.eu/commission/presscorner/detail/en/ip_22_1511

energy prices, diversify our gas supply for next winter and accelerate the clean energy transition. The quicker we switch to renewables and hydrogen, combined with more energy efficiency, the quicker we will be truly independent and master our energy system.”

In May 2022, the EU published the REPowerEU Plan¹⁶ in light of Russia’s invasion of Ukraine in February 2022. The core purpose of the plan, in addition to accelerating the EU’s transition from the use of fossil fuel to renewable energy sources, is to end the dependence on Russian fossil fuels.

In April 2022, the Government published the National Energy Security Framework (NESF) providing a single overarching and initial response to address Ireland’s energy security needs in the context of the war in Ukraine. This framework mirrors that of the EU, in which accelerating Ireland’s transition from the use of fossil fuel to renewable energy sources is a key objective.

1.5.3 Increasing Energy Consumption

As detailed above, the Climate Action Plan 2024 identifies a need for 9GW of onshore wind generation in order for Ireland to meet its 2030 targets. In their ‘*All Island Generation Capacity Statement 2022 - 2031*’ (October 2022), EirGrid estimate that installed capacity of wind generation is set to increase to at least 12 GW between onshore and offshore capacity as Ireland endeavours to meet its renewable targets in 2030 and beyond.

Failure to meet Ireland’s targets for renewable energy will result in substantial EU sanctions. The Department of Public Expenditure and Reform (DPER) in their report ‘Future Expenditure Risks associated with Climate Change/Climate Finance’¹⁷ concluded that ‘*potential costs of purchasing non-Emission Trading Scheme (ETS) GHG compliance for the Irish Exchequer for the 2020 to 2030 period could have a cumulative total in the billions in the absence of any further policy changes*’. If Ireland decided to backfill shortfalls in the RES-H target with additional renewable electricity this could significantly reduce these costs.

In April 2016¹⁸ the SEAI estimated the historic build rate for wind energy deployment as 180 MW per year since 2005. If this average build rate over the remaining period between 2018 and 2020 is assumed, then approximately 3.85 GW of wind would be built up to 2020. By May 2022, the installed wind capacity in the Republic of Ireland is over 4.3GW according to Wind Energy Ireland¹⁹.

It is noted that the key driver for electricity demand in Ireland for the next number of years is the connection of large new energy users, such as data centres. This statement notes that ‘*Large industrial connections normally do not dominate a country’s energy demand forecast but this is the case for Ireland at the moment*’. EirGrid analysis shows that demand from data centres could account for 28% of all demand by 2031 in a median demand scenario (accounts for the connection of all 1400MVA of potential demand in the connection process). The median demand scenario is now higher than last year’s forecast for high demand, indicating the progression of many data centre projects.

In 2015, IWEA commissioned a study ‘*Data Centre Implications for Energy Use in Ireland*’ which concluded that an extra approx. 1 Gigawatt (GW) of electricity demand could materialise between 2015 and 2020 due to growth in data centres. More recently, data available from Bitpower²⁰ at the end of 2021 noted a 25% increase in completed data centre capacity over the past 12 months with a total of 70 operational data centres with a combined total of 900 MW of connected power capacity. Ten new data centres came online between the period of November 2020 and November 2021. The increase in growth of data centres means an increase in electricity demand, with many of the proposed data centres

¹⁶ https://ec.europa.eu/commission/presscorner/detail/en/IP_22_3131

¹⁷ <https://igees.gov.ie/wp-content/uploads/2013/10/Future-Expenditure-Risks-associated-with-Climate-Change-Climate-Finance1.pdf>

¹⁸ https://www.seai.ie/publications/Ireland_s-Energy-Targets-Progress-Ambition-and-Impacts.pdf

¹⁹ <https://windenergyireland.com/about-wind/facts-stats>

²⁰ https://bitpower.ie/images/Reports/2021_H1_Report.pdf

committing to using 100% renewable energy which will result in an increased demand for renewable electricity as detailed above.

In the context of increasing energy demand and prices, uncertainty in energy supply and the effects of climate change, our ability to harness renewable energy such as wind power plays a critical role in creating a sustainable future. The DECC have set a target for Ireland of 80% of total electricity consumption to come from renewable resources by 2030, this target forms part of the Government's strategy to make the green economy a core component of its economic recovery plan for Ireland. It is envisaged that wind energy will provide the largest source of renewable energy in achieving this target, with a target of 9GW onshore wind installed generation capacity and a target of 5GW offshore wind installed generation capacity.

The Department of Communications, Energy & Natural Resources (DCENR) noted in their Draft Bioenergy Plan 2014, that achieving the anticipated renewable energy usage in the three energy sectors will be challenging, with the 12% for renewable heat being particularly so. SEAI estimate that the shortfall could be in the region of 2% to 4% of the 12% RES-H target. Given that individual member states 2030 targets are set at a more challenging level than 2020, fines could persist for an extended number of years, and so the total cost to Ireland could run to billions. For comparison, the entire wholesale electricity market has an annual value of around €3bn.

In the medium-term, with the introduction of electric vehicles and uptake of smart demand such as storage heating and heat pumps, emissions in the heat and transport sector will be substantially reduced. A high renewables electricity system is the foundation of such a transformation.

The White Paper published by DCENR in December 2015 expanded on the vision set out above. It outlines a radical transition to a low carbon future which will involve amongst other things, '*generating our electricity from renewable sources of which we have a plentiful indigenous supply*' and '*Increasing our use of electricity and biogas to heat our homes and fuel our transport*'.

The DCENR confirmed in the publication of the White Paper '*Ireland's Transition to a Low Carbon Future*' 2015 – 2030, that wind is the cheapest form of renewable energy:

"(Onshore wind) 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."

EU countries have agreed on a new 2030 Framework for climate and energy, including EU-wide targets and policy objectives for the period between 2020 and 2030. These targets aim to help the EU achieve a more competitive, secure and sustainable energy system and to meet its long-term 2050 greenhouse gas reductions target. It is noted that a binding EU target of 32% for renewable energy by 2030 has been set by the EU 2030 Framework for Climate and Energy, with Ireland confirming its own targets for 2030 as detailed below.

Ireland will therefore have to meet even more demanding climate change and renewable energy supply obligations in order to play its part in achieving the European climate and energy ambitions. As announced in December 2022, the Irish Government have pledged to generate 80% of the country's electricity supply from renewable sources by 2030. The development of additional indigenous wind energy generating capacity, such as that proposed at the Proposed Development, will not only help to reduce carbon emissions but will also improve Ireland's security of energy supply. Such penetration levels of wind are technically and economically feasible once paired with other energy system changes such as increasing electric vehicle penetration and electrification of heat. Further information on the 2030 commitments for Ireland are noted in Chapter 2, Section 2.5.

These sources of 'flexible demand' allow the system to match intermittent renewable energy resources with minimal extra cost. Additional interconnection is also planned with the UK and France, further assisting in the integration of wind (and in the future solar) on the power system.

A number of alternative energy types have been examined when considering how best to meet this renewable energy target.

In 2014, a report prepared by UK consultant BW Energy for the Rethink Pylons campaign group has suggested that converting Moneypoint generation station (which runs solely on coal) from coal to biomass would have enabled Ireland to meet 2020 renewable energy targets. Dr Brian Motherway, Chief Executive SEAI²¹ refutes this claim. While Dr Motherway agrees that biomass offers benefits and is helping Ireland to move away from fossil fuels, he states that *“the conversion of Moneypoint to biomass has been considered a number of times over the years, including actual trials of small amounts of biomass in the station. However, the technical and economic challenges have proven far greater than some would have us believe”*.

The reason being that the move of Moneypoint from coal to biomass would not entail a clean swap. In fact, *‘to allow for combustion of biomass, a full redesign and rebuild of much of the station would be required’*. In the UK where this has been done, energy generation stations have required significant financial support to make the process viable and with each unit of energy in the UK being worth approx. 13 cents, almost double that of Ireland which is approx. 7 cents, wind energy works out cheaper in Ireland. Also, the amount of biomass required to feed Moneypoint would require 300,000ha of land; an equivalent area of Counties Wexford and Carlow being planted with willow which is far more than Ireland currently produces which means we would need to import.

Importation raises the question; would this be cost effective? As prices are volatile and availability of biomass is difficult to predict Ireland would become dependent on the uncertainty of imported biomass. It is also noted that there will be emissions from transport and distribution. The further the biomass is transported, the greater the greenhouse gas emissions²². So, while biomass is currently contributing to a move to renewable energy production, on its own it is not the sole answer to meeting Ireland’s renewable energy targets. Ireland has a legal obligation to diversify its energy sources requiring the development of renewable energy to avoid substantial fines.

The Joint Committee on Climate Action published its cross-party report entitled, *‘Climate Change: A Cross-Party Consensus for Action’* (March 2019). This report highlights the requirements for alternate energy production. More specifically, the report notes that it is currently planned to stop burning coal at Moneypoint by 2025 as well as peat at Bord na Mona and ESB stations by 2030. In December 2023, the DECC published Climate Action Plan 2024 which is the third annual update to Ireland’s Climate Action Plan 2019 and the second to be prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021. Climate Action Plan 2024 notes the need for renewable alternatives to coal and peat. Further information on the Climate Action Plan can be seen in Chapter 2, Section 2.2.2.

Climate Action Plan 2024 states that as electrification and decarbonisation of other sectors continues, there will be an increase in electricity demand, and a transferring of emissions from those sectors to the electricity sector. The deployment of renewables needs to outpace the growth in energy demand for it to deliver the absolute reductions in greenhouse gas emissions required. Therefore, the timing of the delivery of the renewable energy generation relative to the scale and pace of growth in electricity demand is a critical factor. In the high demand scenario outlined in the Programme for Government, electricity demand will almost double by 2030, while electricity emissions are to be reduced by 60-80% at the same time.

²¹ http://www.seai.ie/News_Events/Press_Releases/2014/Biomass-is-a-big-part-of-the-solution-but-not-the-whole-solution.html

²² *Sustainability Criteria Options and Impacts for Irish Bioenergy Resources (SEAI 2019)*

Underlying drivers of changes in electricity demand include:

- Data centres are forecast to continue to grow by up to ~9 TWh in 2030 (~2316% of total demand)
- Transport electricity demand is forecast to grow (~23% p.a.) as a result of fast uptake of EV charging
- Electrical heating in industry will increase by more than 2.5 times in 2030 from 2017 levels
- Building energy efficiency improvements from an extensive retrofit programme will moderate the growth in electricity demand from new heat pumps in buildings

Against this backdrop, the importance of wind energy as the main component of Ireland's renewable energy development is acknowledged, and wind energy is accepted as the main contributor to meeting the Country's national climate change and energy supply obligations. Notwithstanding this, it must also be acknowledged that not every part of Ireland is well endowed with wind resources and therefore, not all counties will be able to deliver wind-based renewable energy. Furthermore, whilst it is accepted that there are other renewable energy technologies in operation, for the foreseeable future many areas will be unable to deliver significant renewable energy output. This primarily applies to the more populous areas.

National and international renewable energy and climate change targets must be achieved, and it is crucial that these are appropriately translated and implemented at regional and local levels. Wind farm development and design involves balancing the sometimes-conflicting interests of constraints (e.g., natural and built heritage, human beings, ecological, ground conditions, hydrological, etc.) with visual amenity and the technological/economic requirements/realities of the specific project and turbines.

1.5.4

Reduction of Carbon Emissions and Other Greenhouse Gases

The production of renewable energy from the Proposed Project will assist in achieving the Government's and EU's stated goals of ensuring safe and secure energy supplies, promoting an energy future that is sustainable and competitively priced to consumers whilst combating energy price volatility and the effects of climate change.

In addition to a reduced dependence on oil and other imported fuels, the generation of electricity from wind power by the Proposed Project will displace approximately 31,578 tonnes of carbon emissions per annum from the largely carbon-based traditional energy mix, the detail of which is presented in Section 11.5.3 in Chapter 11 of this EIAR.

The World Health Organisation (WHO) in 2019 estimated that ambient (outdoor) air pollution caused 4.2 million deaths worldwide in 2019.²³ The Environmental Protection Agency (EPA) report '*Air Quality in Ireland 2022*'²⁴ noted that in Ireland, the premature deaths attributable to poor air quality are estimated at 1,300 people per annum. The European Environmental Agency (EEA) Report, '*Air Quality in Europe – 2022 Report*'²⁵ highlights the negative effects of air pollution on human health. The report assessed that poor air quality in Europe accounted for premature deaths of approximately 238,000 people in the 27 EU Member States in 2021. The estimated impacts on the population in Europe of exposure to NO₂ and O₃ concentrations in 2021 were around 49,000 and 24,000 premature deaths per year, respectively. Of these numbers, 610 deaths due to poor air quality were estimated in Ireland in 2020 with 490 Irish deaths attributed to PM_{2.5}, 50 Irish deaths attributed to nitrogen oxides (NO₂) and 70 Irish deaths attributed to Ozone (O₃). These emissions, along with others, including

²³ [https://www.who.int/news-room/fact-sheets/detail/ambient-\(outdoor\)-air-quality-and-health](https://www.who.int/news-room/fact-sheets/detail/ambient-(outdoor)-air-quality-and-health)

²⁴ *Air Quality in Ireland Report 2022* <https://www.epa.ie/publications/monitoring-assessment/air/Air_Quality_Report_22_v8v2.pdf>

²⁵ *Air Quality in Europe 2022* <<https://www.eea.europa.eu/publications/air-quality-in-europe-2022>>

sulphur oxides (SO_x), are produced during fossil fuel-based electricity generation in various amounts, depending on the fuel and technology used, emissions from industry and power plants, vehicles emissions and transport fuels.

The EPA 2016 report *'Ireland's Environment – An Assessment'* states that the pollutants of most concern are NO_x, (the collective term for the gases nitric oxide and nitrogen dioxide, PM (particulate matter) and O₃ (ozone). The EPA 2016 report goes on to state that:

"Ireland has considerable renewable energy resources, only a fraction of which are utilised to address our energy requirements.

Wind, ocean, solar, hydro and geothermal energy do not produce GHG (greenhouse gas) emissions or emissions of air pollutants such as particulates, sulphur dioxide and nitrogen dioxide. Use of these renewable resources can have considerable co-benefits for human health and ecosystems. Meeting energy requirements from renewable resources can provide significant economic and employment benefits at local to national scales."

The Proposed Project therefore represents an opportunity to further harness Ireland's significant renewable energy resources, with valuable benefits to air quality and in turn to human health. The consumption of fossil fuels for energy results in the release of particulates, sulphur dioxide and nitrogen dioxide to our air. The use of wind energy, by providing an alternative to electricity derived from coal, oil or gas-fired power stations, results in emission savings of carbon dioxide (CO₂), oxides of nitrogen (NO_x), and sulphur dioxide SO₂, thereby resulting in cleaner air and associated positive health effects.

1.5.5 Economic Benefits

In addition to helping Ireland avoid significant fines and reducing environmentally damaging emissions, the Proposed Development will have significant economic benefits. At a national level, Ireland currently has one of the highest external dependencies on imported sources of energy, such as coal, oil and natural gas. As detailed in the SEAI Report *'Energy in Ireland 2023'*, Ireland has a high import dependence on oil and gas and is essentially a price-taker on these commodities. The *'Energy in Ireland 2022 Report'*²⁶ stated that 2021 was the first year since 2016, in which Ireland's indigenous production of energy from renewables (17,500 GWh) exceeded that of indigenous gas (14,600 GWh); however, in 2022 indigenous gas production once again exceeded renewables production. The SEAI estimates electricity emissions to be 7.3 MtCO_{2e} in 2023, the addition of this best estimate for 2023 to the definitive 2021 and 2022 electricity emissions reported by the EPA identifies a 3-year 2021 - 2023 total of 27.0 MtCO_{2e}. The 5-year 2021-2025 sectoral emission ceiling for electricity is 40 MtCO_{2e}. This means that 13.0 MtCO_{2e} of budgeted electricity emissions will remain for the last 2 years of the 2021-2025 carbon budget. To remain within its sectoral emission ceiling, electricity emissions would therefore need to remain below an average of 6.5 MtCO_{2e} in both 2024 and 2025. The SEAI report *'Energy in Ireland – 2023 Report'* indicated that wind energy:

- Accounted for 85.7% of renewable energy generated in 2022.
- Capacity at the end of 2022 was 4.54GW, this is a 4.6% increase from wind energy capacity in 2021.

The Proposed Project will be capable of providing electrical energy to approximately 32,703 Irish households every year, as presented in the calculations in Chapter 4 of this EIAR.

²⁶ Sustainable Energy Authority Ireland (2022) *Energy in Ireland – 2022 Report*

1.5.5.1 Employment potential

The 2014 report 'The Value of Wind Energy to Ireland', published by Pöyry, stated that growth of the wind sector in Ireland could support 23,850 jobs (construction and operational phases) by 2030. The reduction in fuel imports not only benefits security of supply but also creates a net transfer to the Irish economy, potentiality allowing for a saving of almost €671m of expenditure on fuel imports per annum by the time we reach 2030.

A 2021 MaREI report²⁷ includes a prospective view of Ireland's energy sector in 2050 whereby an additional 25,000 jobs would be created in the development of onshore and offshore wind to meet the zero carbon targets as pledged in the Climate Action and Low Carbon Development Act 2021 discussed in section 1.5.1 above.

Likewise, the Proposed Project will have several significant long-term and short-term benefits for the local economy including job creation, landowner payments, local authority commercial rate payments and a Community Benefit Scheme.

It is estimated that the Proposed Project has the potential to create up to 100 jobs during the construction phase and 3-4 jobs during operational and maintenance phases. During construction, additional indirect employment will be created in the region through the supply of services and materials. There will also be income generated by local employment from the purchase of local services i.e., travel, goods and lodgings. Further details on employment associated with the Proposed Project are presented in Chapter 5 of this EIAR, Population & Human Health.

Should the Proposed Project receive planning permission, there are substantial opportunities available for the local area in the form of Community Benefit Funds. Based on the current proposal, should the Proposed Project enter the Renewable Energy Support Scheme (RESS), the proposed Community Benefit Fund would attract a community contribution in the region of approximately €275,000/year for the first 15 years of operation, to be used by the local community over the lifetime of the Proposed Project. The value of this fund will be directly proportional to the energy produced by the Proposed Wind Farm and will support and facilitate projects and initiatives in the area.

Further details on the proposed Community Gain proposals are presented in Appendix 2-1 and Section 4.9 in Chapter 4 of this EIAR. Please see Appendix 2-1 'Community Engagement Report' for details.

1.5.5.2 Commercial Rates

Commercial rate payments will be provided to Kilkenny County Council each year which will be redirected to the provision of public services within the County. These services include provisions such as road upkeep, fire services, environmental protection, street lighting, footpath maintenance etc. along with other community and cultural support initiatives.

1.6 Purpose and Scope of the EIAR

The purpose of this EIAR is to document the current state of the environment on and in the vicinity of the Site and to quantify the likely significant effects of the Proposed Project on the environment. The compilation of this document served to highlight any areas where mitigation measures may be necessary in order to protect the surrounding environment from the possibility of any negative impacts arising from the Proposed Project.

²⁷ MaREI 2021 Our Climate Neutral Future: Zero by 2050. <https://www.marei.ie/wp-content/uploads/2021/03/Our-Climate-Neutral-Future-Zero-by-50-Skillnet-Report-March-2021-Final-2.pdf>

It is important to distinguish the Environmental Impact Assessment (EIA) to be carried out by Kilkenny County Council, from the EIAR accompanying the planning application. The EIA is the assessment carried out by the competent authority, which includes an examination that identifies, describes and assesses in an appropriate manner, in the light of each individual case and in accordance with Articles 4 to 11 of the Environmental Impact Assessment Directive, the direct and indirect significant effects of the project on the following:

- a) *population and human health*
- b) *biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC.*
- c) *land, soil, water, air and climate*
- d) *material assets, cultural heritage and the landscape*
- e) *the interaction between the factors referred to in points (a) to (d)*

This EIAR provides the relevant environmental information to enable the EIA to be carried out by the competent authority. The information to be contained in the EIAR is prescribed in Article 5 of the revised EIA Directive described in Section 1.2 above.

1.7

Structure and Content of the EIAR

1.7.1

General Structure

This EIAR uses the grouped structure method to describe the existing environment, the potential impacts of the Proposed Project thereon and the proposed mitigation measures. Background information relating to the Proposed Project, scoping and consultation undertaken and a description of the Proposed Project are presented in separate sections. The grouped format sections describe the impacts of the Proposed Project in terms of population and human health, biodiversity, with specific attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EEC; land, soils and geology, water, air quality, climate, noise and vibration, landscape and visual, cultural heritage and material assets such as traffic and transportation, vulnerability to major accidents and natural disasters, together with the interaction of the foregoing and schedule of mitigation and monitoring.

The chapters of this EIAR are as follows:

- Introduction
- Background to the Proposed Project
- Considerations of Reasonable Alternatives
- Description of the Proposed Project
- Population and Human Health
- Biodiversity (excluding Birds)
- Birds
- Land, Soils and Geology
- Hydrology and Hydrogeology
- Air Quality
- Climate
- Noise and Vibration
- Landscape and Visual
- Cultural Heritage
- Material Assets (including Traffic and Transport, Telecommunications and Aviation)
- Major Accidents and Natural Disasters
- Interactions of the Foregoing
- Schedule of Mitigation Measures

The EIAR also includes a Non-Technical Summary, which is a condensed and easily comprehensible version of the EIAR document. The non-technical summary is laid out in a similar format to the main EIAR document and comprises a description of the Proposed Project followed by the existing environment, impacts and mitigation measures presented in the grouped format.

1.7.2

Description of Likely Significant Effects and Impacts

As stated in the 'Guidelines on the Information to be Contained in Environmental Impact Assessment Reports' (EPA, 2022), an assessment of the likely impacts of a development is a statutory requirement of the EIA process. The statutory criteria for the presentation of the characteristics of potential impacts requires that potential significant impacts are described with reference to the extent, magnitude, complexity, probability, duration, frequency, reversibility and trans-boundary nature (if applicable) of the impact.

The classification of impacts in this EIAR follows the definitions provided in the Glossary of Impacts contained in the EPA Guidelines (EPA, 2022) document.

The European Commission published a number of guidance documents in December 2017 in relation to Environmental Impact Assessment of Projects (Directive 2011/92/EU as amended by 2014/52/EU) including 'Guidance on Screening', 'Guidance on Scoping' and 'Guidance on the preparation of the Environmental Impact Assessment Report', which have also been consulted.

Table 1-2 presents the glossary of impacts as published in the EPA Guidelines (EPA, 2022) document. Standard definitions are provided in this glossary, which permit the evaluation and classification of the quality, significance, duration and type of impacts associated with a proposed project on the receiving environment. The use of pre-existing standardised terms for the classification of impacts ensures that the EIA employs a systematic approach, which can be replicated across all disciplines covered in this EIAR. The consistent application of terminology throughout this EIAR facilitates the assessment of the Proposed Project on the receiving environment.

Table 1-2 Impact Classification Terminology (EPA, 2022)

Impact Characteristic	Term	Description
Quality	Positive	A change which improves the quality of the environment
	Neutral	No effects or effects that are imperceptible, within normal bounds of variation or within the margin of forecasting error.
	Negative	A change which reduces the quality of the environment
Significance	Imperceptible	An effect capable of measurement but without significant consequences
	Not significant	An effect which causes noticeable changes in the character of the environment

Impact Characteristic	Term	Description
		but without significant consequences.
	Slight	An effect which causes noticeable changes in the character of the environment without affecting its sensitivities
	Moderate	An effect that alters the character of the environment in a manner consistent with existing and emerging baseline trends
	Significant	An effect, which by its character, magnitude, duration or intensity alters a sensitive aspect of the environment
	Very significant	An effect which, by its character, magnitude, duration or intensity significantly alters most of a sensitive aspect of the environment
	Profound	An effect which obliterates sensitive characteristics
Extent & Context	Extent	Describe the size of the area, number of sites and the proportion of a population affected by an effect
	Context	Describe whether the extent, duration, or frequency will conform or contrast with established (baseline) conditions
Probability	Likely	Effects that can reasonably be expected to occur because of the planned project if all mitigation measures are properly implemented
	Unlikely	Effects that can reasonably be expected not to occur because of the planned project if all mitigation measures are properly implemented

Impact Characteristic	Term	Description
Duration and Frequency	Momentary	Effects lasting from seconds to minutes
	Brief	Effects lasting less than a day
	Temporary	Effects lasting less than a year
	Short-term	Effects lasting one to seven years
	Medium-term	Effects lasting seven to fifteen years
	Long-term	Effects lasting fifteen to sixty years
	Permanent	Effect lasting over sixty years
	Reversible	Effects that can be undone, for example through remediation or restoration
	Frequency	Describe how often the effect will occur. (once, rarely, occasionally, frequently, constantly – or hourly, daily, weekly, monthly, annually)
Type	Indirect	Impacts on the environment, which are not a direct result of the project, often produced away from the project site or because of a complex pathway
	Cumulative	The addition of many minor or significant effects, including effects of other projects, to create larger, more significant effects.
	‘Do Nothing’	The environment as it would be in the future should the subject project not be carried out
	‘Worst Case’	The effects arising from a project in the case where mitigation measures substantially fail

Impact Characteristic	Term	Description
	Indeterminable	When the full consequences of a change in the environment cannot be described
	Irreversible	When the character, distinctiveness, diversity, or reproductive capacity of an environment is permanently lost
	Residual	Degree of environmental change that will occur after the proposed mitigation measures have taken effect
	Synergistic	Where the resultant effect is of greater significance than the sum of its constituents

Each impact is described in terms of its quality, significance, duration and type, where possible. A 'Do-Nothing' impact is also predicted in respect of each environmental theme in the EIAR. Residual impacts are also presented following any impact for which mitigation measures are prescribed. The remaining impact types are presented as required or applicable throughout the EIAR. Any potential interactions between the various aspects of the environment assessed throughout this EIAR are presented in Chapter 17: Interaction of the Foregoing.

1.8 Project Team

1.8.1 Project Team Responsibilities

The companies and staff listed in Table 1-3 were responsible for completion of this EIAR of the Proposed Project. Further details regarding project team members are provided below.

The EIAR project team comprises a multidisciplinary team of experts with extensive experience in the assessment of wind energy developments and in their relevant area of expertise. The qualifications and experience of the principal staff from each company involved in the preparation of this EIAR are summarised in Section 1.8.2 below. Each chapter of this EIAR has been prepared by a competent expert in the subject matter.

Table 1-3 Companies and Staff Responsible for EIAR Completion

Consultants	Principal Staff Involved in Project	EIAR Input
MKO Tuam Road, Galway, H91 VW84	Gus McCarthy Brian Keville Michael Watson Sean Creedon Eoin McCarthy Jack Smith Michéal Cahill Colm Ryan	Project Managers, Scoping and Consultation, Preparation of Natura Impact Statement, EIAR Sections: 1. Introduction 2. Background to the Proposed Project 3. Considerations of Reasonable Alternatives

Consultants	Principal Staff Involved in Project	ElAR Input
	Meabhann Crowe Alan Clancy Mike Amiel Mekell Pat Roberts John Hynes Aoife Joyce Colin Murphy Aran v.d. Geest Moroney Fiona Killeen Ryan Connors Padraig Cregg Donnacha Woods Catherine Johnson Jack Workman Alan Roache Dija Mazonaite Brian O'Carroll Killian Devereux	4. Description of the Proposed Project 5. Population & Human Health 6. Biodiversity 7. Birds 10. Air Quality 11. Climate 14. Landscape & Visual 15. Material Assets (non-Traffic) 16. Major Accidents and Natural Disasters 17. Interaction of the Foregoing 18. Schedule of Mitigation and Monitoring
Hydro Environmental Services 22 Lower Main Street Dungarvan Co. Waterford	Michael Gill Conor McGettigan Jennifer Law	Drainage Design, Preparation of ElAR Sections: 8. Land, Soils & Geology 9. Hydrology and Hydrogeology
Danu Energy Consulting Ltd Suite B3, 15-18 Earlsfort Terrace, Saint Kevin's, Dublin 2 D02 YX28	Cormac Ó Dubhthaigh John Shanahan	Civil Engineer- Geotechnical Oversight Borrow Pit Design and Spoil Volumes
AWN The Tecpro Building, Clonsaugh Business & Technology Park, Dublin 17	Dermot Blunnie Mike Simms	Baseline Noise Survey, Preparation of ElAR Section 12. Noise and Vibration
Tobar Archaeological Services Saleen Middleton Co. Cork	Miriam Carroll	Preparation of ElAR Section 14. Archaeological, Architectural and Cultural Heritage
Alan Lipscombe Traffic and Transport Consultants Claran, Headford, Co. Galway	Alan Lipscombe	Swept Path Analysis, Preparation of ElAR Section 15. Material Assets - Traffic and Transport

*A Statement of Authority is included in each chapter of this ElAR detailing the experts who contributed to the preparation of this report, identifying for each such expert the part or parts of the report which he or she is responsible for or to which he or she contributed, his or her competence and experience, including relevant qualifications in relation to such parts, and such additional information

in relation to his or her expertise that demonstrates the expert's competence in the preparation of the report and ensures its completeness and quality.

1.8.2 Project Team Members

1.8.2.1 MKO

Gus McCarthy BA, MRUP, MIPI

Augustine (Gus) McCarthy is a Company Director with MKO and is a professional planner with over 35 years of experience in both private practice and local authorities combined. Prior to establishing AP McCarthy Planning Consultants in 2000, Gus worked as a Senior Planner for both Galway County Council and Galway City Council. Gus has significant experience in a wide range of projects and extensive experience in both terrestrial and coastal/marine based developments. He is retained as planning advisor for development programmes of large organisations and has been the lead planning consultant on a wide range of infrastructure, energy, commercial and other projects throughout the Country.

Brian Keville B.Sc. (Env.)

Brian Keville has over 20 years' professional experience as an environmental consultant having graduated from the National University of Ireland, Galway with a first-class honours degree in Environmental Science. Brian was one of the founding directors of environmental consultancy, Keville & O'Sullivan Associates Ltd., prior to the company merging in 2008 to form McCarthy Keville O'Sullivan Ltd. Brian's professional experience has focused on project and environmental management, and environmental impact assessments. Brian has acted as project manager and lead-consultant on numerous environmental impact assessments, across various Irish counties and planning authority areas. These projects have included large infrastructural projects such as roads, ports and municipal services projects, through to commercial, mixed-use, industrial and renewable energy projects. The majority of this work has required liaison and co-ordination with government agencies and bodies, technical project teams, sub-consultants and clients.

Michael Watson BA. MA. CEnv. PGeo

Michael Watson is a Director of Environment in MKO. Michael has over 20 years' experience in the environmental sector. Following the completion of his master's degree in environmental resource management, Geography, from National University of Ireland, Maynooth he worked for the Geological Survey of Ireland and then a prominent private environmental & hydrogeological consultancy prior to joining MKO in 2014. Michael's professional experience includes managing Environmental Impact Assessments, EPA License applications, hydrogeological assessments, environmental due diligence and general environmental assessment on behalf of clients in the wind farm, waste management, public sector, commercial and industrial sectors nationally. Michael's key strengths include project strategy advice for a wide range and scale of projects, project management and liaising with the relevant local authorities, Environmental Protection Agency (EPA) and statutory consultees as well as coordinating the project teams and sub-contractors. Michael is a key member of the MKO senior management team and as head of the Environment Team has responsibilities to mentor various grades of team members, foster a positive and promote continuous professional development for employees. Michael also has a Bachelor of Arts Degree in Geography and Economics from NUI Maynooth, is a Member of IEMA, a Chartered Environmentalist (CEnv) and Professional Geologist (PGeo).

Sean Creedon BSc. MSc

Sean Creedon is an Associate Director in the Environment Team at MKO. He leads a team of highly skilled environmental professionals working on EIAR for large-and medium scale Renewable Energy infrastructure. Sean has directed and overseen multiple renewable energy projects across wind, solar, battery and hydrogen as well as a range of thermal and other energy related developments. He has worked on the planning and environmental impact elements within all stages of wind farm project delivery. Sean's professional experience includes the development and management of a portfolio of wind farm developments to the consenting decision. He is a member of the MKO senior management team. Sean has over 22 years' experience in program and project development, holds an MSc from NUI Galway and a Diploma in Project Management from Institute of Project Management Ireland.

Eoin McCarthy BSc

Eoin is a Project Director with McCarthy O'Sullivan Ltd. with over 13 years of environmental consultancy experience. Eoin holds 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. Since joining MKO in 2011, Eoin has been involved as a Graduate, Assistant and Project Environmental Scientist on a significant range of energy infrastructure, tourism, waste permit, flood relief scheme and quarrying projects. He has overseen some of the largest SID wind energy in Ireland in that time. 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. Eoin is also involved in the development of project strategy for the projects that he manages. He has held the role of project manager on over 550MW worth of wind energy projects. Within MKO Eoin plays a large role in the management of and sharing of knowledge with junior members of staff and works as part of a large multi-disciplinary team to produce EIA Reports.

Jack Smith BCL. ML. MSc

Jack Smith is a Project Environmental Scientist with MKO with over three years' experience in private consultancy. Jack holds a MSc. in Environmental Leadership from NUIG. Jack is a Practitioner member of the Institute for Environmental Management and Assessment. Jack's key strengths and expertise lie Environmental Protection and Management, Environmental Impact Assessment Reports, Project Management, and GIS Mapping and Modelling, and in conducting Landscape and Visual Impact Assessments (LVIA). Since joining MKO, Jack has been involved in a range of renewable energy infrastructure projects. In his role as a project manager, Jack 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. Jack also specialises in preparing Landscape and Visual Impact Assessment Reports for large-scale renewable energy projects including wind farms, solar farms, as well as a range of other projects such as large-scale habitat restoration schemes, quarry extraction and large-scale housing schemes. In addition, Jack has experience in preparing strategic level and project level landscape feasibility reports for large wind farm projects. Jack also has legal and regulatory knowledge and expertise due to his LL.M. in International Environmental and Energy Law.

Michéal Cahill (BSc. Env)

Michéal Cahill is a Graduate Environmental Scientist with MKO. Michéal holds a first-class honours degree in Environmental Science at University of Galway and was awarded the Professor Emer Colleran Medal for his academic achievements. Prior to taking up his position with MKO in June 2024, Michéal previously worked as an environmental sustainability intern with RPS Group. Michéal has

previous experience in the preparation and review of Environmental Impact Assessment Reports for both offshore and onshore wind farm projects, as well as aiding in the research and design phase of a proposed pumped hydroelectric storage plant. Michéal's key strengths and areas of expertise are in environmental impact assessment, the preparation and writing of high-quality reports, proficiency in geographic information systems, ecological assessment and risk assessment. As an environmental scientist within MKO's environmental renewables team, Michéal is involved in the preparation and revision of a variety of reports for a range of energy infrastructure projects.

Colm Ryan

Colm Ryan is the Planning Director of MKO, Planning & Environmental Consultants, with over 16 years of experience as a planner in both private practice and public sector combined. Prior to joining MKO, Colm worked as a planner with a UK and Ireland based Renewable Energy developer. Colm has also spent part of his career in local authority as a planner with Laois County Council. Colm has significant experience in a wide range of projects and extensive experience in large scale residential, renewables and marine based developments. Colm currently heads up the Planning Division in MKO with responsibility for Planning, Project Management, Health & Safety and Project Communications. Colm holds BA (Hons) in Geography & Irish and Masters in Civic Design Town & Regional Planning. Prior to taking up his position with MKO in May 2017, Colm worked as a Senior Planner with Lightsource Renewable Energy Ltd. and held previous posts with Partnerships for Renewables, South Kesteven District Council, Planning Aid, Frank O Gallachoir & Associates in Bray and Laois County Council. Colm is a chartered town planner with specialist knowledge in renewable energy, mixed use development and residential. Colm's key strengths and areas of expertise are in large scale renewable energy development particularly in the ground mounted solar, delivery of local community engagement processes on contentious planning applications, management of community and developers interest through the planning process and post or pre-planning due diligence. Since joining MKO as a Senior Planner Colm has been overseeing and managing a wide range of development projects such as large scale solar applications, site feasibility work for potential wind energy projects, large scale housing and mixed use schemes. Within MKO Colm plays a large role in the management of staff members including several aspects of business development. Colm has proven negotiation skills and stakeholder relationship building across numerous development projects in Ireland and the UK and is a corporate member of the Irish Planning Institute.

Meabhann Crowe

Meabhann Crowe is a Project Director within the Planning Renewables team in MKO and has 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 Masters in Urban and Regional Planning. Prior to taking up her position with McCarthy Keville O'Sullivan in October 2018, Meabhann was employed as an Associate Director with Colliers International in their Edinburgh office, prior to which she was employed for several years with Halliday Fraser Munro. In her time in the industry Meabhann has been active on a number of instructions across a broad spectrum of mixed-use, residential, commercial, renewable energy and retail projects.

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 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.

Alan Clancy BA (Hons), MPlan

Alan Clancy is a Project Planner with MKO with over 8 years of experience in private practice. Alan holds a BA in Geography & History and Masters in Planning and Sustainable Development. Prior to

taking up his position with MKO in February 2022, Alan worked as a Planner for Indigo Telecom Group in Limerick Ireland where he assisted with management of all planning aspects of new telecommunications network roll out programmes for leading telecommunications operators. Prior to this, Alan worked in the UK with the JTS Partnership LLP, where he gained experience as a graduate planner through to planner level. 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 been working closely with Pamela Harty, Meabhann Crowe and the wider planning team, 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 BA, MSc

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 Dublin and an MSc (Hons) in Planning and Development from Queen's University Belfast. He is a Licentiate of the Royal Town Planning Institute. Prior to taking up his position with MKO, Mike worked as a Graduate Environmental Planner with Roughan and O'Donovan. In this role he prepared Environmental Impact Assessment Screening and Scoping reports, environmental monitoring and management reports and planning reports for projects involving public and active transport infrastructure and sustainable tourism development.

His main responsibilities include preparing planning application documents and reports, preparing inputs for Environmental Impact Assessment Reports and liaising with multidisciplinary project teams.

Pat Roberts B.Sc. (Env.)

Pat Roberts is Principal Ecologist with MKO with over 18 years post graduate experience of providing ecological services in relation to a wide range of developments at the planning, construction and monitoring stages. Pat holds B.Sc. (Hons) in Environmental Science. Pat has extensive experience of providing ecological consultancy on large scale industrial and civil engineering projects. He is highly experienced in the completion of ecological baseline surveys and impact assessment at the planning stage. He has worked closely with construction personnel at the set-up stage of numerous construction sites to implement and monitor any prescribed best practice measures. He has designed numerous Environmental Operating Plans and prepared many environmental method statements in close conjunction with project teams and contractors. He has worked extensively on the identification, control and management of invasive species on numerous construction sites. Prior to taking up his position with MKO in June 2005, Pat worked in Ireland, USA and UK as a Tree Surgeon and as a nature conservation warden with the National Trust (UK) and the US National Park Service. Pat's key strengths include his depth of knowledge and experience of a wide range of ecological and biodiversity topics and also in his ability to understand the requirements of the client in a wide range of situations. He is currently responsible for staff development, training and ensuring that the outputs from the ecology team are of a very high standard and meet the requirements of the clients and relevant legislation and guidelines. He is a full member of the Chartered Institute of Ecologists and Environmental Managers (CIEEM)

John Hynes M.Sc. (Ecology), B.Sc.

John Hynes is the Ecology Director at MKO, with over 12 years' professional experience in the public and private sector. John oversees MKO's Ecology, Ornithology, Forestry, Bats, and GIS teams. John holds a B.Sc. in Environmental Science and a M.Sc. in Applied Ecology.

John's key strengths and areas of expertise are in Appropriate Assessment of plans and projects, Ecological Impact Assessment, Flora and Fauna survey methods and design, project management and

project strategy. John is experienced as a coordinator of large multi-disciplinary teams on complex ecological projects. John has been involved as a lead Ecologist on a range of energy infrastructure, commercial, transport, housing, forestry, biodiversity net gain and nature restoration projects. John is a Full member of the Chartered Institute of Ecology and Environmental Management, a member of Galway County Council Climate and Biodiversity Special Policy Committee (SPC) and a contributor to the Wind Energy Ireland (WEI) Biodiversity and Sustainability Working Group.

Aoife Joyce M.Sc. (Agribioscience), B.Sc.

Aoife Joyce is a Project Director (Ecology) with 5 years' professional experience in ecological assessments and has completed CIEEM and BCI courses in Bat Impacts and Mitigation, Bat Tree Roost Identification and Endoscope training, Bat ID, Trapping and Handling and Kaleidoscope Pro Analysis. She is a graduate of Environmental Science (Hons.) at University of Galway, complemented by a first-class honours MSc in Agribioscience. Prior to taking up her position with MKO in 2019, Aoife held previous posts with Inland Fisheries Ireland and Treemetrics Ltd. She has a wide range of experience from bat roost identification, acoustic sampling, sound analysis, electrofishing, mammal and habitat surveying to GIS, soil and water sampling, Waste Acceptability Criteria testing, Environmental Impact Assessments (EIAs) and mapping techniques. Since joining MKO, Aoife has been involved in managing bat survey requirements for a variety of renewables planning applications, as well as commercial, residential and infrastructure projects. This includes scope development, project coordination, roost assessments, remote bat detector deployment, dawn and dusk bat detection surveys, bat handling, sonogram analyses, mapping, impact assessment, mitigation design inputs and report writing. Within MKO, she oversees the bat team and works as part of a wider multidisciplinary team to help in the production of ecological reports and assessments. Aoife is a member of Bat Conservation Ireland and CIEEM and holds current Bat Roost Disturbance and bat photography licenses.

Colin Murphy

Colin Murphy is a Project Ecologist with over with over four years of experience in private consultancy. Colin holds a B.Sc (Hons) in Ecology and Environmental Biology from University College Cork and a M.Sc in Ecosystem Science and Policy from University College Dublin.

Colin has experience in producing Habitats Directive Assessments, Ecological Impacts Assessment Reports (EcIA), Biodiversity Net Gain Assessments and preparing Biodiversity Chapters in Environmental Impact Assessment Reports (EIAR) for a variety of wind farm planning applications, as well as commercial, residential and infrastructure projects. Colin's key strengths and expertise are Ecological Constraints identification, Ecological Impact Assessment, Habitats Directive Assessment, Project Management and GIS Mapping. Colin has extensive experience in conducting a wide range of ecological surveys including habitat surveys, invasive species surveys, bat surveys, winter wildfowl and waders' surveys and protected species surveys (marsh fritillary, otter and badger). Colin is also experienced in providing Ecological Clerk of Work (EcOW) and site supervision on a wide variety of project, including residential and commercial construction projects and wastewater treatment plant upgrade works.

Aran von der Geest Moroney B.Sc.

Aran von der Geest Moroney is an ecologist with MKO having joined the company in February 2021 and having over 3 years experience in professional ecological consultancy. Aran holds a first-class honours BSc (Hons) in Ecology and Environmental Biology from University College Cork. Aran has also completed a Level 8 Special Purpose Award in Digital Mapping and GIS. Aran's key strengths and areas of expertise are wintering bird surveying and identification, freshwater macroinvertebrate identification and sampling, freshwater pearl mussel surveying, white-clawed crayfish surveying, electric fishing, bat surveys, GIS, habitat mapping, preparation of Stage 1 and Stage 2 Appropriate Assessment reports and Ecological Impact Assessment. Since joining MKO, Aran has been involved in a range of mixed use, residential, industrial, restoration, public services, wind energy and forestry projects. Aran

has carried out a wide range ecological field surveys in accordance with NRA Guidelines, bat surveys, bird surveys, recording vegetation relevés and freshwater quality analysis using bioindicators. Aran has provided supervision as an ecological clerk of works in residential and wastewater infrastructure projects. Aran is trained in carrying out bat surveys, non-volant mammal surveys, bird surveys, freshwater pearl mussel surveys, white-clawed crayfish surveys, electric fishing surveys, river condition assessment surveys and in taking vegetation relevés of vascular plants and has experience in habitat identification and habitat mapping. Within MKO, Aran is responsible for independently carrying out and planning a range of ecological field surveys in accordance with NRA Guidelines and carrying out Appropriate Assessment screenings, Natura Impact Statements, Ecological Impact Assessments, Biodiversity chapters for EIARs, Invasive Species Management Plans and Aquatic reports as part of the ecology team. Aran is a member of CIEEM, holds a current Bat Roost Disturbance licence and holds an IFM Certificate in Electric Fishing.

Fiona Killeen

Fiona is an Ecologist with MKO with over 1 year's professional ecological consultancy experience. Fiona holds B.Sc. (Hons) in Environmental Science. Fiona joined the MKO Ecology team as a graduate ecologist in October 2022, and was promoted to Ecologist role in April 2023. Fiona's key strengths and areas of expertise are in undertaking a range of specific ecological surveys i.e. rare plants, otter, badger, birds, bats, marsh fritillary, Annex 1/rare and protected habitats) as well as liaising with clients throughout the planning process and detailing a range of ecological reports for planning including Appropriate Assessments (Stage 1 and Stage 2-NIS), Preliminary Ecological Assessments, Invasive Species Management Plans, Ecological Impact Assessments, Ecological Briefing Notes, Ecological Constraint reports, while advising clients to be precautionary and strategic to reduce planning risks. Since joining MKO Fiona has been involved as an Ecologists on a significant range of energy infrastructure i.e. solar and wind farm developments, commercial, education, tourism, housing and residential projects in addition to Uisce Eireann projects dealing with Wastewater & Water Treatment Plants, with more projects in the pipeline. Within MKO, Fiona plays a key role in report writing, undertaking relevant ecological surveys, liaising with clients/project managers and confidence building of junior members of staff and works as part of a large multi-disciplinary team. Fiona holds qualifying membership with The Chartered Institute of Ecology and Environmental Management.

Ryan Connors

Ryan is a Bat Ecologist with MKO having joined the company in March 2023. Ryan holds a BSc (Hons) in Zoology at National University of Ireland, Galway and a MSc (Hons) in Conservation Behaviour at Atlantic Technological University. He has a range of experience from bat roost identification, acoustic sampling, sound analysis, mammal and habitat surveying to GIS, Ecological Impact Assessments (EclAs) and mapping techniques. Since joining MKO, Ryan has been involved in roost assessments, deploying static bat detectors and weather stations nationwide, dawn and dusk bat detection surveys, sonogram analysis, mapping, impact assessment, mitigation and report writing. He attended BATS Research & Training courses on surveying trees for bats. Within MKO, he works as part of a multidisciplinary team to help in the production of ecological reports and assessments. Ryan currently holds a Bat Roost Disturbance licence and is a member of Bat Conservation Ireland as well as a qualifying member with CIEEM.

Padraig Cregg M.Sc., B.Sc.

Padraig Cregg is employed as a Principal Ornithologist for MKO and has over eleven years' experience of working in environmental consultancies. In his role with MKO, he acts as technical advisor for the ornithology team helping to take projects through their full lifecycle, from site selection through survey design, constraints studies, impact assessment and lodgement of the planning application. He is responsible for training the ornithology team and undertakes to keep up-to-date and keep his colleagues updated on all emerging guidance, legislation, policies, initiatives, industry best practice and emerging trends and market opportunities. Padraig joined MKO in 2018.

Donnacha Woods

Donnacha Woods is a Project Ornithologist with MKO with over 9 years of experience in both private consultancy and public conservation work. He holds a BSc (Hons) in Zoology, and a MSc (Hons) in Biodiversity and Conservation where he focused his studies on feather morphology and its implications on bird flight. Donnacha's key strengths and expertise are bird surveying and identification, survey design, data analysis and report writing. Prior to joining MKO in August 2020, Donnacha has worked in private consultancy as an ecologist with Mott MacDonald and Enviroguide, and has also worked with BirdWatch Ireland and equivalent conservation organisations in France and Canada. Since joining MKO, Donnacha has been involved in a range of wind energy projects, in addition to projects in housing, education, afforestation, fishing and other sectors. In his role as a project manager, Donnacha works with and co-ordinates a team within MKO's Ornithological department, as well as sub-contractor ornithologists, in the collection and analysis of data for the production of EIAR Bird chapters, Natura Impact Statements and other reports as required. Donnacha is also experienced in impact assessment and in the writing of EIAR Bird Chapters for large-scale wind energy projects.

Catherine Johnson

Catherine is an Environmental Scientist and Climate Practitioner at MKO with over two years of consultancy experience in climate and sustainability. Prior to joining MKO in 2022, Catherine worked as an Environmental Social Governance (ESG) analyst for Acasta in Edinburgh. Catherine has expertise in internal climate law and policy, earth science, and sustainability/ESG processes. Catherine has a BSc in Earth and Ocean Science and an LLM in Global Environment and Climate Change Law.

Jack Workman MSc

Jack is the Landscape & Visual Team manager at MKO and is a Technician Member with the British Landscape Institute. He is a Landscape and Visual Impact Assessment Specialist with an academic background in the field of Environmental Science and Geography. Jack's primary role at MKO is conducting Landscape and Visual Impact Assessment (LVIA) for Environmental Impact Assessment reports. Jack holds a BSc. in Psychology, and an MSc. in Coastal and Marine Environments (Physical Processes, Policy & Practice) where he was awarded the Prof. Máirín De Valéra distinction in science research award. Prior to taking up his position with MKO, Jack worked as a Geospatial Analyst and Research Assistant with NUIG and also held previous posts in the coastal engineering sector with Royal Haskoning DHV and Saltwater Technologies. Since joining MKO in February 2020, Jack has conducted and project managed all aspects of LVIA for a broad range of commercial infrastructure developments including wind and solar energy projects, grid infrastructure, extraction industry and Strategic Housing Developments. Jack holds a membership with the Chartered Institute of Water and Environmental Management and is also a member of the Landscape Research Group.

Alan Roache

Alan Roache is a graduate member of the Landscape and Visual Team with MKO. He took up this position in September 2023 upon completion of his MSc. in Environmental Leadership at University of Galway. Alan's primary role at MKO is assisting in Landscape and Visual Impact Assessments for Environmental Impact Assessment reports, as well as supporting the MKO graphics, CAD and drone surveying teams.

Dija Mazonaite

Dija Mazonaite is an Environmental Scientist and LVIA Specialist at MKO with one year of experience. Dija has a BSc (Hons) in Geography & Geosystems and was recognised as a University Scholar at the University of Galway. Dija was also a finalist in Undergraduate of the Year for Innovative Sustainable Thinking. Dija's primary role at MKO is producing the LVIA chapter of EIA reports for large

infrastructure developments. Since joining MKO, Dija has conducted and project managed all aspects of LVIA for a broad range of commercial infrastructure developments including wind and solar energy projects, grid infrastructure, extraction industry and Strategic Housing Developments. Dija's key strengths include proficiency in GIS tools such as ArcGIS and QGIS, conducting landscape and visual impact assessments and capturing image data through drone surveys and photomontages. Dija is an affiliate member with the Landscape Institute and is also a member with IEMA, with qualifications to fly drones in the A1/A3 subcategories.

Brian O'Carroll

Brian O'Carroll currently holds the position of Graphics Technician within MKO.

Brian has obtained a second-class honours degree (level 8) in Design – Visual communications from the Limerick School of art and Design. Prior to taking up his position with MKO in June 2023, Brian worked for close to 20 years as a graphic designer and Pre Press Manager and former Senior graphic designer within the print industry.

Brian has worked within the design department, as a graduate he joined Cube Printing Ltd, (Limerick) and worked his way from junior designer to senior and then lead designer for Cube. Brian then progressed to the design and Pre Press Manager of the well established Davis printers (Limerick). His key skills are the implementation of the skills acquired over the years in the Adobe Suite, primarily but not limited to Indesign, Photoshop, Lightroom and Illustrator. Communication and planning for print are amongst Brian's greatest attributes. Brian is now fully versed in WindPro Software and is a key part of the Graphics Pod within MKO, has recently completed training in Pano2VR and Website design.

Killian Devereux

Killian is currently the Project CAD Technician at MKO, he has over 8 years of drafting experience in various sectors of the building industry. He holds BSc (Hons) in Architectural Technology from Galway Mayo Institute of Technology. Prior to taking up his position with MKO in October 2022, Killian worked as a Structural CAD/BIM Technician for Tobin Consulting Engineers and as an Architectural Technician for some smaller-scale Engineering Consultants. He was primarily involved in a variety of Commercial / Residential projects where he was responsible for the structural drawing packages but also has experience working in RC concrete Drawings, Architectural and Civil drawings, FSC's /DAC's and one-off housing planning applications. His key strengths and areas of expertise are in Auto CAD, Revit, Cads RC and Google Sketch up. Since Joining MKO Killian has been the lead CAD technician on multiple Renewable Energy Planning Applications.

1.8.2.2 Hydro Environmental Services Ltd

Michael Gill

Michael Gill P.Geo (BA, BAI, Dip Geol., MSc, MIEI) is a Civil/Environmental Engineer and Hydrogeologist with over 22 years' environmental consultancy experience in Ireland. Michael has completed numerous hydrological and hydrogeological impact assessments of wind farms and renewable projects in Ireland. In addition, he has substantial experience in geological characterisation, peatland morphology, and surface water drainage design and SUDs design and surface water/groundwater interactions. Michael has worked on the EIS/EIAR for Oweninny WF, Cloncreen WF, Derrinlough WF and over 100 other wind farm related projects across the country.

Conor McGettigan

Conor McGettigan (BSc, MSc) is an Environmental Scientist with 4 years' experience in the environmental sector in Ireland. Conor holds an M.Sc. in Applied Environmental Science (2020) and a B.Sc. in Geology (2016) from University College Dublin. Conor routinely prepares the hydrology and hydrogeology chapters of environmental impact assessment reports for wind farm developments. Conor has also prepared several flood risk assessments and Water Framework Directive compliance assessments for various renewable energy developments in Ireland.

Jenny Law

Jenny Law (BSc, MSc) is an environmental geoscientist holding a first honour's degree in applied environmental geosciences from the University College Cork in 2022. Jenny has assisted in the preparation of the land, soils and geology and hydrology chapters for various environmental impact assessment reports, hydrological impact assessments, Water Framework Directive Assessment reports and Flood Risk Assessment reports for a variety of projects including wind farm developments and strategic housing developments.

1.8.2.3 DANU Engineering Consultancy

Cormac Ó Dubhthaigh BE MEngSc CEng MIEI

Cormac is an experienced chartered civil engineer who has worked in the renewable energy sector since 2009, primarily involved in the design of wind farm, solar farm and energy storage projects in Ireland and further afield. Prior to that he worked for over a decade in the structural design of buildings and bridges in several leading engineering consultancy firms in Ireland and Australia.

Cormac specialises in the structural design of wind turbine foundations, along with all civil engineering aspects of renewable projects from pre-planning stage right through to detailed design and construction stage, as well as assessments of operational projects.

John Shanahan Operations Director BE MSc CEng MIEI

John is a chartered engineer and has been working on renewable energy, grid and substation projects since 2013. Prior to working in the renewable sector, from 2004 he worked on various pharmaceutical, water, transport, environmental and energy projects. John advises on all civil and structural engineering aspects of wind, solar and energy storage projects, in addition to underground grid connections, substations and battery facilities. He has experience in both design and providing technical advisory services at all stages of renewable energy projects.

1.8.2.4 AWN Consulting

Dermot Blunnie

Dermot Blunnie (Principal Acoustic Consultant) holds a BEng (Hons) in Sound Engineering, MSc in Applied Acoustics and has completed the Institute of Acoustics (IOA) Diploma in Acoustics and Noise Control. He has been working in the field of acoustics since 2008 and is a member of the Institute of Engineers Ireland (MIEI) and the Institute of Acoustics (MIOA). He has extensive knowledge and experience in relation to commissioning noise monitoring and impact assessment of wind farms as well as a detailed knowledge of acoustic standards and proprietary noise modelling software packages. He has commissioned noise surveys and completed noise impact assessments for numerous wind farm projects within Ireland.

Mike Simms

Mike Simms (Principal Acoustic Consultant) holds a BE and MEngSc in Mechanical Engineering and is a member of the Institute of Acoustics (MIOA) and of the Institution of Engineering and Technology (MIET). Mike has worked in the field of acoustics for over 20 years. He has extensive experience in all aspects of environmental surveying, noise modelling and impact assessment for various sectors including, wind energy, industrial, commercial and residential.

1.8.2.5 Tobar Archaeological Services

Tobar Archaeological Services is a Cork-based company in its 20th year in business. They offer professional nationwide services ranging from pre-planning assessments to archaeological excavation, and cater for clients in state agencies, private and public sectors.

Miriam Carroll

Tobar's Director, Miriam Carroll, is licensed by the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs to carry out excavations in Ireland and has carried out work directly for the National Monuments Services of the Department of the Environment, Heritage and Local Government. Tobar Archaeological Services has a proven track record and extensive experience in the wind farm industry from EIS/EIAR stage through to construction stage when archaeological monitoring is frequently required. Miriam holds a Degree in Archaeology (1993-1996) and a 2-year Masters in Methods and Techniques in Irish Archaeology (1996-1998) from UCC and has over 20 years' experience in private sector archaeology. Miriam has managed and co-ordinated numerous projects from commencement stage to completion on behalf of numerous small and large companies.

1.8.2.6 Alan Lipscombe Traffic and Transport Consultants

Alan Lipscombe

This section of the EIAR has been prepared by Alan Lipscombe of Alan Lipscombe Traffic and Transport Consultants Ltd. Alan is a competent expert in traffic and transport assessments. In 2007 Alan set up a traffic and transportation consultancy providing advice for a range of clients in the private and public sectors. Prior to this Alan was a founding member of Colin Buchanan's Galway office having moved there as the senior transportation engineer for the Galway Land Use and Transportation Study. Since the completion of that study in 1999, Alan has worked throughout Ireland on a range of projects including: major development schemes, the Galway City Outer Bypass, Limerick Planning Land-Use and Transportation Study, Limerick Southern Ring Road Phase II, cost benefit analyses (COBA) and various studies for the University of Galway. Before moving to Galway in 1997, Alan was involved in a wide variety of traffic and transport studies for CBP throughout the UK, Malta and Indonesia. He has particular expertise in the assessment of development related traffic, including many wind farm developments including the following; Ardderroo, Derrinlough, Knocknamork, Shehy More, Cloncreen, Derrykillew, Ballyhorgan, Lettergull, Barnadivane, Cleanrath, Knockalough, Sheskin South and Borrisbeg.

Alan has a BEng (hons) Degree in Transportation Engineering (Napier University, Edinburgh, 1989), is a member of Engineers Ireland and of the Institute of Highways and Transportation and is a TII accredited Road Safety Audit Team Member.

RECEIVED: 03/01/2025

1.9 Difficulties Encountered

There were no technical difficulties encountered during the preparation of this EIAR.

1.10 Viewing and Purchasing of the EIAR

Copies of this EIAR will be available online for the planning application, including the Non-Technical Summary (NTS), on the Planning Section of the Kilkenny County Council website, under the relevant Planning Reference Number (to be assigned on lodgement of the application).

Kilkenny County Council: <https://kilkennycoco.ie>

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

Kilkenny County Council,
County Hall,
John Street,
Kilkenny,
Co. Kilkenny

The EIAR will also be available to view online via the Department of Planning, Housing and Local Government's EIA Portal, which will provide a link to the planning authority's website on which the application details are contained. This EIA Portal was recently set up by the Department as an electronic notification to the public of requests for development consent which are accompanied by an EIAR.

(<https://www.housing.gov.ie/planning/environmental-assessment/environmental-impact-assessment-eia/eia-portal>)