4 Planning and Policy

4.1 Introduction

This chapter of the Environmental Impact Assessment Report (EIAR) examines the relevant waste management, energy, climate change and planning policy, and the legislative context at European, national, regional, and local levels with relevance to the Proposed Development located within the townlands of townland of Cappanihane, Bruree, Co. Limerick.

The Proposed Development is an agricultural-related development, that will support the sustainability of the agricultural sector, utilising agricultural wastes (from surrounding farms) to produce renewable biomethane and biobased fertiliser in the form of digestate arising from operations.

4.2 Site Planning Application History

A planning history search was conducted using the Limerick City and County Council ('LC&CC' hereafter) online planning search system. The search included the planning history of the Site and relevant surrounding permissions.

As a result of the rural nature of the Site, there is no planning history for the Site.

4.2.1 Adjacent Lands

Reg. Ref.: 86/26307 – Southeast of the Site – Extension to Dwelling House

LC&CC issued a final grant of permission on the 26th June 1986, for an *"extension to dwellinghouse".*

Reg. Ref.: 88/28892 – Southwest of the Site – Renovations to Dwelling House

LC&CC issued a final grant of permission on the 15th September 1998, for *"renovations to dwellinghouse including development of first floor and provision of new roof".*

Reg. Ref.: 89/947 – Southwest of the Site – Erection of 2 Storey House

LC&CC issued a final grant of permission on the 12th October 1989 for the *"erection of two-storey house, garage, entrance and septic tank".*

Reg. Ref.: 93/425 – East of the Site – Retention of Septic Tank

LC&CC granted permission on the 17th June 1993 for the retention of a septic tank.

In relation to the same site, LC&CC granted permission under Reg. Ref.: 07/1414, on the 11th October 2007, subject to 10 no. conditions, for a *"stable barn, entrance and associated site works".*

Prior to the final grant, LC&CC requested further information ('FI' hereafter) on the 4th July 2007 and the 21st August 2007. The requested items are summarised below:

- Show that adequate site lines can be achieved.

- Submit revised proposals for the single access to serve the dwelling and the proposed stables.
- Demonstrate site lines from the entrance of 90 metres in both directions to the near edge of the road measured at a height of 1m from point, 3m back from road edge.

A further application for permission was granted by LC&CC under Reg. Ref.: 14/460, on the 16th June 2014, subject to 9 no. conditions, for the following development as described in the public notices:

"Refurbishment of disused dwelling house, construction of extensions to side & rear, demolition of existing entrance porch, installation of secondary wastewater treatment and associated polishing filter & all associated works."

Reg. Ref.: 94/283 – Southwest of the Site – Slatted Unit for Cows

LC&CC issued a final grant of permission on the 17th May 1994, for the *"construction of slatted unit for cows".*

Reg. Ref.: 96/26114 – Southeast of the Site – Outline Permission - Change of Use to Garage and Erection of Petrol Service Station

LC&CC issued a final grant of outline permission on the 30th April 1986, for the *"change of use of store to garage and erection of petrol service station".*

Reg. Ref.: 96/307 – Southeast of the Site – Outline Permission – Erection of Dwelling House

LC&CC refused outline permission on the 30th July 1999 for the following development, as described in the public notices:

"Erection of dwellinghouse, entrance and Puraflo waste treatment system."

Reg. Ref.: 96/1923 – Southeast of the Site – Reconstruction and Redevelopment of Dwelling

LC&CC issued a final grant of permission on the 8th August 1997, for the *"reconstruction and redevelopment of an existing dwelling".*

Reg. Ref.: 00/1683 – Southeast of the Site – Demolition of Cottage and Construction of Bungalow

LC&CC issued a final grant of permission on the 12th October 2000, for the *"demolition of an existing cottage and construction of bungalow, entrance and septic tank".*

Reg. Ref.: 01/311 – North of the Site – Retention of Septic Tank

LC&CC issued a final grant of permission on the 2nd August 2001, for retention of a septic tank.

Reg. Ref.: 01/1716 – South of the Site – Bungalow

LC&CC refused permission on the 3rd March 2002, for the *"construction of a bungalow, entrance and septic tank".*

Reg. Ref.: 01/1857 – South of the Site – Bungalow

LC&CC issued a final grant of permission on the 2nd May 2002, subject to 6 no. conditions, for the *"erection of bungalow, entrance & biocycle waste water treatment system".*

Prior to the final grant, LC&CC requested FI on the 12th October 2001, 30th November 2001 and 22nd February 2002.

On the same site, LC&CC issued a final grant of permission under Reg. Ref.: 04/2875, subject to 1 no. condition, for the *"construction of a domestic garage"*

Reg. Ref.: 04/2551 – North of the Site – Dwelling House

LC&CC issued a final grant of permission on the 27th January 2005, subject to 14 no. conditions, for the *"construction of dwellinghouse, domestic garage/shed, entrance, wastewater treatment system, percolation area and well".*

Reg. Ref.: 05/3419 – North of the Site – Retention Permission – Extension to Dwelling House

LC&CC issued a final grant of retention permission on the 9th March 2006, subject to 4 no. conditions, for the *"construction of extension to dwellinghouse".*

Reg. Ref.: 07/124 – North of the Site – Slatted Shed and Silage Pit

LC&CC issued a final grant of permission on the 19th April 2007, subject to 6 no. conditions, for the *"construction of a slatted shed, silage pit and associated site works".*

Reg. Ref.: 11/37 – Southwest of the Site – Refused – Construction of Dwelling House

LC&CC refused permission on the 16th March 2011, for *"the construction of a dwelling house, garage, effluent treatment system with polished filter, entrance and all associated works".*

The decision was appealed by the Applicant on the 6th April 2011, and the application was sent to An Bord Pleanála ('the Board' hereafter) for review and final decision under ABP Ref.: 13.238723. The Board issued a final refusal on the 29th July 2011.

4.2.2 Biogas Facility Related Planning History

Reg. Ref.: 03/879 – Kilmore, Granagh, Kilmallock, Co. Limerick

LC&CC issued a final grant of permission on the 28th August 2003, subject to 2 no. conditions, for the following development, as described in the public notices:

"Construction of a digester to process pig manure and other organic materials to produce renewable energy and fertilizer, extension to Dry sow house, extension to Farrowing house, extension to Weaner house, rain protection covers over passageways, an engineered storage basin and associated site works and retention of Weaner house(2 No.), Mill house, Generator house, extension to Dry sow house and offices with septic tank and percolation area. An EIS has been submitted as part of this application. Also the development comprises of an activity in relation to which a licence under Part IV of the EPA Act 1992 is required."

Reg. Ref.: 06/3951 – Kilmore, Granagh, Kilmallock, Co. Limerick

On the same site, under Reg. Ref.: 06/3951, LC&CC issued a final grant of permission on the

29th March 2007, subject to 4 no. conditions, for the following development:

"Construction of an extension to the third stage Weaner House and a new fattening house. Also for the revision of the type and location of tanks, an additional engineered storage basin and shed for a Biogas Plant to process pig manure and other organic material to produce renewable energy and fertilizer granted under planning ref. 03/879."

LC&CC issued a final grant of extension of duration for the same development, under Reg. Ref.: 12/7000.

Prior to this final grant, LC&CC requested FI on 15th May 2012. The requested items are summarised below:

- Four individual site layout plan drawings that clearly and unambiguously identify all structures on the site a follows:

- The site prior to grant of permission 03/879.
- The site as developed under 03/879.
- The site as developed under 06/3951.
- The site as it currently exists having regard to both applications.

- Clarify the status of the digester to process pug manure and other organic materials to produce renewable energy and fertiliser as permitted under 03/879 i.e. has it been constructed having regard to its expiry date of 27/08/2008. Also clarify the planning status of the shed as permitted under 06/3951.

4.3 European Policy and Legislation

4.3.1 Energy and Climate

The need to recognise the impact of anthropogenic climate change and transition our way of life towards dealing with the effects of climate change is dealt with across European policy and legislation. The key energy and climate policies and legislative documents with relevance to the Proposed Development are set out in this section.

The EU has pledged to achieve climate neutrality by 2050, delivering on commitments under the Paris Agreement (COP21). Reaching this objective will require a transformation of Europe's energy supply, society, and economy. With the 2030 Climate Target Plan[1], the EC proposes to raise the EU's ambition on reducing greenhouse gas (GHG) emissions to at least 55% below 1990 levels by 2030. The plan recognises the significant contribution of the agricultural sector to GHG emissions and while these emissions can never be fully eliminated under existing technology and management options, they can be significantly reduced, whilst ensuring food security is maintained in the EU. Efficient use of fertilisers, adopting precision farming, a healthier herd and the deployment of AD technologies treating organic waste to produce renewable biogas are highlighted within the plan as examples of existing technologies.

The European Green Deal package of policy initiatives was launched by the EC in 2019, which aims to set the EU on the path to a green transition, with the ultimate goal of reaching climate

[1] Communication from The Commission to The European Parliament, The Council, The European Economic and Social Committee and The Committee of the Regions - *Stepping up Europe's 2030 climate ambition Investing in a climate-neutral future for the benefit of our people*. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0562

neutrality by 2050. The associated Fit for 55 legislative package aims to translate the ambitions of the Green Deal into law. The policy package itself underlines the need for a cross-sectoral approach in which all relevant policy areas contribute to the ultimate climate-related goal. The package includes initiatives covering the climate, the environment, energy, transport, industry, agriculture, and sustainable finance.

The Green Deal recognises that "*renewable and low-carbon gases, such as biomethane, will play a central role in achieving climate neutrality"*[2]*.* Biogas and biomethane, renewable and low carbon hydrogen have the potential to gradually replace fossil gases, including natural gas, and can be used as a fuel to reduce emissions in hard-to-abate sectors, particularly in industry and transport.

As part of the Deal, the EU Farm to Fork Strategy[3] was published which includes proposals to transform agriculture and position it as a key sector for climate mitigation and adaptation. The development of an agri-led biomethane industry in Ireland is strongly aligned with a number of the headline Farm to Fork goals, including:

- Ensure food production has a neutral or positive environmental impact.
- Carbon Farming Initiative - implement green business models that sequester carbon.
- Promote a circular bio-based economy.
- Reduce pesticide use and excess nutrients in the environment by 2030.
- Achieve a 50% reduction in nutrient losses without reducing soil fertility leading to a 20% reduction in fertiliser use.
- Increase the proportion of organic farming to 25% by 2030.

4.3.2 EU Common Rules on Renewable Gasses

The common rules for the internal markets for renewable gas, natural gas and hydrogen (recast) European Parliament legislative resolution was published on the 11th of April 2024.

The common rules outlined that the Commission communication of 8 March 2022 entitled 'REPowerEU: Joint European Action for more affordable, secure and sustainable energy' (REPowerEU), which was adopted after the beginning of Russia's unprovoked and unjustified military aggression against Ukraine, highlighted the importance of diversification of gas supplies to phase out the Union's dependency on Russian energy.

REPowerEU recognised that "*scaling up sustainable biomethane and the roll-out of renewable hydrogen could play a decisive role"* in ensuring secure and more sustainable power supply for the EU.

The common rules recognise that "*Although electrification is a key element of the green transition, household natural gas consumption, including increasing volumes of renewable gas, in particular biomethane, will continue to exist in the future."*

The common rules go on to state the following:

[2] European Commission, Directorate-General for Communication, (2021) *Delivering the Green Deal: the role of clean gases including hydrogen.* https://data.europa.eu/doi/10.2775/718801

[3] Communication from The Commission to The European Parliament, The Council, The European Economic and Social Committee and The Committee of the Regions - *A Farm to Fork Strategy for a fair, healthy, and environmentally friendly food system.* https://ec.europa.eu/info/sites/default/files/communication-annex-farm-fork-green-deal_en.pdf

"Member States should take concrete measures to assist the wider use of sustainable biomethane, or other types of gas, that can technically and safely be injected into, and transported through, the natural gas system, the producers of which should be granted non-discriminatory access to that system, provided that such access is compatible with the relevant technical rules and safety standards on an ongoing basis and unless otherwise provided for in this Directive"

The rules also state that Member States should seek to expedite and support the connection of biomethane producers to the natural gas network, and that Member States must ensure that transmission and distribution system operators adhere to reasonable time limits to assess requests for the injection of biomethane.

4.3.3 Renewable Energy Directive

The current Renewable Energy Directive 2018/2001/EU[4] entered into force in December 2018 and has since been amended by Directive EU 2023/2413[5] (RED III). On the 12th of September 2023, RED III was adopted by the Parliament. The Directive establishes a basis in policy for the production and promotion of renewable energy, setting a new binding renewable energy target for the EU for 2030 of at least 42.5%, with this target having been revised upward in 2023 from 32%.

This target is a continuation of the 20% target for 2020. In order to help EU member countries to achieve this target, the directive introduces new measures for various sectors of the economy, particularly on heating, cooling, and transport. It also includes new provisions to enable citizens to play an active role in the development of renewables by enabling renewable energy communities and self-consumption of renewable energy. It also establishes strengthened criteria to ensure bioenergy's sustainability.

The 2023 amending Directive altered the 2018 Directive to align with increased climate ambitions and recognise renewable energy as an "overriding public interest" in the Appropriate Assessment process.

Under this revision the planning, construction and operation of renewable energy plants, their connection to the grid and the related grid itself, and energy storage assets are presumed to be in the overriding public interest and serving public health and safety when balancing legal interests for the purposes of the Birds, Habitats, and Water Framework Directives. The revisions to the Directive present further evolution of the target to accelerate the development of renewable energy developments in EU member states.

Building on the 2009 and 2018 directives, the revised directive introduces stronger measures to ensure that all possibilities for the further development and uptake of renewables are fully utilised. This will be key to achieving the EU's objective of climate neutrality by 2050 and to strengthen Europe's security of energy supply.

In addition to the new headline target to double the existing share of renewable energy sources, a strong policy framework will facilitate electrification in different sectors, with new

[4] Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources. https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=uriserv:OJ.L_.2018.328.01.0082.01.ENG

[5] Directive (EU) 2023/2413 of the European Parliament and of the Council of 18 October 2023 amending Directive (EU) 2018/2001, Regulation (EU) 2018/1999 and Directive 98/70/EC as regards the promotion of energy from renewable sources, and repealing Council Directive (EU) 2015/652 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32023L2413&qid=1699364355105

increased sector-specific targets for renewables in heating and cooling, transport, industry, buildings, and district heating/cooling, but also with a framework promoting electric vehicles and smart recharging.

To support renewables uptake in transport and heating and cooling, the revised directive transposes into EU law some of the concepts outlined in the energy system integration and hydrogen strategies, published in 2020. These concepts aim at creating an energy-efficient, circular, and renewable energy system that facilitates renewables-based electrification and promotes the use of renewable fuels, including hydrogen, in sectors like transport or industry where electrification is not yet a feasible option. For these hard-to-electrify sectors, the directive sets new binding targets for renewable fuels of non-biological origin.

As an important bottleneck to the deployment of renewables on the ground, permitting procedures will also be easier and faster both for renewable energy projects (including through shorter approval periods and the creation of 'Renewables acceleration areas') and for the necessary infrastructure projects. Under the amended Directive, member states must identify areas for the acceleration of renewables where projects will undergo a simplified and fast-track procedure.

Member States (including Ireland) must transpose RED III into national law by the 21st May 2025. However, certain provisions – including those aimed at accelerating permit-granting procedures – are required to be transposed into national law by the 1st July 2024.

4.3.4 REPowerEU Energy Plan

The European Commission presented the REPowerEU Energy Plan on the 18th of May 2022, which aims to tackle the climate crisis by accelerating Europe's clean energy transition and adopts a call to end European dependency on Russian fossil fuels. The Plan recognises that the uptake of biomethane involves a continued support to innovative technologies for the production of sustainable biomethane, upgrade of biogas to biomethane and its integration within the gas network.

The proposal contains a Biomethane Action Plan[6] to stimulate the renewable gas value chain within EU member states and achieve production of 35 billion cubic metres (bcm) of biomethane by 2030. This plan also includes a targeted revision of the Fitfor55 energy efficiency and renewable targets, together with the necessary measures to accelerate Renewable Energy Sources (RES) permitting and recommendations to facilitate renewable gas injection.

4.3.5 EU Strategy to reduce Methane Emissions

After CO_2, methane is recognised as the second largest GHG contributor to climate change. Methane emissions from livestock originate from ruminant species, manure management and feed cultivation. The EU Strategy to reduce Methane Emissions[7], published in 2020, acknowledges the agriculture sector as having the highest potential in overall benefits for reducing methane emissions. The Strategy points to the benefits of biogas derived from organic agricultural wastes to reduce methane emissions, generate new revenue streams for

[6] Biomethane Action Plan. https://eur-lex.europa.eu/legal content/EN/TXT/?uri=SWD%3A2022%3A230%3AFIN&qid=1653033922121

[7] European Commission (2020) *Communication from the Commission to the European Parliament, The European Council, The Council, The European Economic and Social Committee and the Committee of the Regions* - on an EU strategy to reduce methane emissions

farmers and contribute to wider rural development.

The use of digestate is also identified as an organic soil improver and mechanism to displace chemical fertilisers. It is noted that sequential cropping can be used with manure as feedstock for sustainable biogas production, while contributing to sustainable farming practices. The Strategy aims to provide targeted support to accelerate the development of the EU market for biogas from sustainable sources such as livestock manure, organic waste, and residues via policy initiatives.

4.3.6 Waste

The benefits of Anaerobic Digestion (AD) are recognised and promoted in European Union (EU) waste management legislation and policy. The EU Directives and policies discussed below, which set the context for the management of waste in Ireland (and which are transposed and implemented by domestic legislation), encourage the use of AD as an essential element of sustainable waste management and an efficient recycling method for organic wastes.

The Waste Framework Directive (2008/98/EC, as amended by Directive (EU) 2018/851) enshrines a key principle which aims to move waste away from landfill and towards treatment options. The separate collection of organic waste with a view to its biological treatment, through processes such as AD, is encouraged by this Directive.

The objective of landfill diversion is also a requirement of the Landfill Directive (1999/31/EC).

The foundation of EU waste management is the five-step “waste hierarchy”, established in the Waste Framework Directive. It establishes an order of preference for managing and disposing of waste.

Figure 4.1: The Waste Hierarchy

On the 5th of July 2023, a targeted revision of the Waste Framework Directive[8] was published by the Environment Directorate General of the European Commission. The proposal aims to bring about increased circular and sustainable management of waste and aims to reduce the environmental and climate impacts of food systems associated with food waste generation.

Towards a circular economy: a zero-waste programme for Europe[9] was proposed in 2014 by the EC to establish a common and coherent EU framework to promote the circular economy. In December 2017, a provisional agreement was reached with representatives of the European Parliament on all four legislative proposals of the package with new targets. An obligation on EU member states to separately collect organic waste and associated ban of organic waste landfilling will come into effect as of 2024. The circular economy principles, and particularly the development of a bioeconomy can provide opportunities for agricultural residues such as those from crops, animal manures and dairy by-products, to be used to produce biobased fertiliser and renewable energy through the AD process.

4.4 National Planning, Climate, and Waste Policy and Legislation

4.4.1 National Biomethane Strategy[10]

The National Biomethane Strategy ('NBS' hereafter) was published by the Department of Environment, Climate, and Communications and the Department of Agriculture, Food and the Marine on the 28th of May 2024. The NBS sets out the necessary policy and regulatory measures and provides a roadmap to developing a biomethane industry of scale in Ireland. In all aspects, this application aligns with the aspirations set out in the NBS as described in more detail below.

A wide range of support mechanisms were assessed during the development of the NBS, including Feed in Tariffs (FiT) and Contracts for Difference (CfD). Given the need to swiftly stimulate the industry, the Renewable Heat Obligation in conjunction with Capital Grants were the chosen method to support the delivery of a biomethane sector in Ireland. This offers budget certainty for the support programme while delivering a sector of scale.

Renewable Heat Obligation: The NBS states, *"To support the need to decarbonise the heat sector, the Government has agreed to the introduction of a Renewable Heat Obligation (RHO). The RHO* ***will support an increased use of renewable energy in the heat sector and contribute to a reduction in emissions*** *in line with Ireland's climate ambitions. As Ireland imports most of its fossil fuels, the heating sector is a significant contributor to Ireland's high energy import dependency. The RHO will also help reduce our reliance on imported fossil fuels and strengthen our energy security due to greater diversification of our energy streams. Under current proposals, the RHO would recognise biomethane as an eligible fuel for certification, providing an important policy tool to support the development of an indigenous biomethane sector. CAP 24 commits to the publication of a high-level RHO scheme by Q3 2024".* [**Emphasis added**].

The vision of the NBS states, *"By 2030, Ireland will have developed a sustainable biomethane industry of scale, meeting ambitious targets set by the Government".*

[8] Proposal for a targeted revision of the Waste Framework Directive. https://environment.ec.europa.eu/publications/proposal-targeted-revision-waste-framework-directive_en

[9] Communication from The Commission to The European Parliament, The Council, The European Economic and Social Committee and The Committee of the Regions - *Towards a circular economy: a zero-waste programme for Europe.* https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A52014DC0398

[10] National Biomethane Strategy (2024): https://www.gov.ie/en/publication/d115e-national-biomethane-strategy/

The primary objective of the NBS is to deliver on the ambitious target set by the Government as part of the agreement on the sector emission ceilings. This ambition is to scale up indigenously produced biomethane to 5.7 TWh (Terawatt hour) per annum by 2030, which has been increased substantially from a previous Climate Action Plan 2019 target of 1.6 TWh by 2030.

The NBS states that *"biomethane has the potential to progressively replace fossil gas supplies at a national level as we substantially reduce our use of gas over the next 15 to 20 years."*

The strategy states that Ireland is recognised by the European Commission as having one of the largest potentials for biomethane production in Europe on a per capita basis due to its substantial agriculture sector. The development of a new agri-centric biomethane industry can engender cross sectoral benefits for Ireland. However, the strategy states that currently Ireland has only two operational biomethane facilities injecting biomethane into the gas grid; the volume of biomethane injected into the grid at present is small, equating to c. 75 GWh per annum (0.001% of Ireland's current gas demand).

The benefits that Ireland can realise from the development of a new agri-centric biomethane industry are summarised as follows:

- Without biomethane, Ireland is unlikely to meet its legally binding climate targets.
- Biomethane helps to reduce agriculture sector emissions.
- Diversification option for farmers.
- Opportunity to replace chemical fertiliser with a supply of biobased fertiliser.
- Helps reduce Ireland's energy emissions.
- Improves gas security and diversification of supply.
- Stimulation of the rural economy.

This application proposes to develop an AD facility to produce biomethane . This proposal is supported by the National Biomethane Strategy, and it is evident from the strategy, that this development type is crucial in order to achieve climate targets, rural and farm diversification, the replacement of chemical fertiliser with a supply of biobased fertiliser and improve gas security and diversification of supply. The proposal will also deliver a notable contribution to local employment (direct and indirect), stimulating the rural economy.

The Strategy also notes the importance of biomethane production for ensuring security of energy supply in Ireland. It is noted that c. 75% of Ireland's gas supply is currently imported from the UK, with biomethane (along with hydrogen in the future) playing a key role in ensuring a domestic supply of renewable gas to diversify gas supply and displace fossil gas. The Proposed Development directly contributes to this objective.

The Strategy analyses a range of policy options for the roll-out of biomethane production, with a combination of small scale and larger-scale facilities ultimately supported by Government Policy. Therefore, the scale of the plant aligns with the aspirations of the NBS.

The strategy recognises the effectiveness and maturity of carbon dioxide capture technology as part of biomethane production. This technology is an integral part of the Proposed Development, with CO_2 resulting from the biogas upgrading / refining process to be captured at source. In summary, this application fully aligns with the aspirations set out in the NBS as presented above.

4.4.2 National Planning Framework

The National Planning Framework[11] (NPF hereafter) was published in 2018 and forms the top tier of Ireland's planning policy hierarchy, setting the policy context at a national level for Regional Spatial and Economic Strategies, County and City Development Plans, and Local Area Plans.

The Proposed Development aligns with the National Planning Framework, the overarching policy and planning framework for the social, economic, and cultural development of Ireland. This development specifically relates to the NPF in terms of Planning for Diverse Rural Places (Chapter 5) and Realising our Sustainable Future (Chapter 9).

National Policy Objective (NPO hereafter) 21 states the following:

"Enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through the diversification of the rural economy into new sectors and services, including ICT-based industries and those addressing climate change and sustainability."

The role of rural areas in providing a sustainable renewable energy supply is recognised in the NPF, which states:

"In planning Ireland's future energy landscape and in transitioning to a low carbon economy, the ability to diversify and adapt to new energy technologies is essential. Innovative and novel renewable solutions have been delivered in rural areas over the last number of years, particularly from solar, wind and biomass energy sources.

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

Furthermore, the competitive advantage of rural activities associated with the bioeconomy is highlighted in the NPF, which states:

"The transition to a more circular economy and bioeconomy, where the value of bio-based products, materials and resources is maintained in the economy for as long as possible, and the generation of waste management is minimised, will provide an essential contribution to our national goal of developing a sustainable, low-carbon, resource efficient and competitive economy.

We take special note of the following National Policy Objectives, which aim to:

Reference	Description
NPO 23	*"Facilitate the development of the rural economy through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture**, energy and extractive industries, the bio-economy and diversification into alternative on-farm and off-farm activities**, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism."* [**Emphasis added**].

[11] Government of Ireland (2020) *National Planning Framework*: 39baaa8c-48dc-4f24-83bd-84bbcf8ff328.pdf (www.gov.ie)

NPO 53	*"Support the circular and bio economy including in particular through greater efficiency in land management, greater use of renewable resources and by reducing the rate of land use change from urban sprawl and new development."*

The NPF identifies the need to reduce emissions while ensuring that Ireland has a reliable and resilient energy supply, as expressed in Section 9.2:

"Ireland's national energy policy is focused on three pillars: (1) sustainability, (2) security of supply and (3) competitiveness. The Government recognise that Ireland must reduce greenhouse gas emissions from the energy sector by at least 80% by 2050, compared to 1990 levels, while at the same time ensuring security of supply of competitive energy sources to our citizens and businesses."

The transition of the energy sector towards low-carbon and renewable sources of energy is recognised as playing a key role in achieving a sustainable and climate-friendly future for Ireland, as expressed by the following National Policy Objectives:

Reference	Description
NPO 54	*"Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions."*
NPO 55	*"Promote renewable energy use and generation **at appropriate locations within the built and natural environment** to meet national objectives towards achieving a low carbon economy by 2050."* [**Emphasis added**].

Finally, the NPF supports circular economy principles that aim to minimise the amount of waste that goes into landfill and maximise the utilisation of waste as a resource, as expressed by the following National Policy Objective:

NPO 56: *"Sustainably manage waste generation, invest in different types of waste treatment and **support circular economy principles**, prioritising prevention, reuse, recycling and recovery, to support a healthy environment, economy and society".* [**Emphasis added**].

Statement of Consistency with the National Planning Framework

The Proposed Development is consistent with the NPF, the principles of which are reflected in the various regional and local policy documents as discussed below.

We note in particular the role that the Proposed Development can play in strengthening the economic and climate resiliency of the county and State. Furthermore, partnerships with the farming community can contribute to the reduction of emissions in the agricultural sector and the sustainable diversification of agricultural activities in response to climate change.

The energy sector must transition towards low-carbon and renewable sources to achieve the 80% reduction in emissions by 2050, as set out in the NPF. AD facilities can play an important role in this transition. Finally, the Proposed Development provides an opportunity to sustainably utilise agricultural waste as a resource, to produce biobased fertiliser and renewable energy through the AD process, allowing for the decarbonisation of the gas network.

The Proposed Development is strongly supported by, and is fully consistent with, the national policy objectives highlighted above. The development will deliver local employment and

significant economic benefits in a rural area, while producing renewable biomethane and helping to improve the sustainability of the agricultural sector in the vicinity.

Additionally, we note the publication of the 'Updated Draft Revised National Planning Framework'[12]. In the event that a decision is made on the current application after the adoption of this revision to the National Planning Framework (which we understand will be finalised by April or May 2025), we note the strong additional policy support for Biomethane development contained at Page 130 of the updated draft revision document. This section of the draft revised National Planning Framework states:

"Biomethane is a carbon-neutral renewable gas made from farm and food waste through a process known as anaerobic digestion. A National Biomethane Strategy has been published which requires the development of policies with the primary objective of delivering the ambitious target of producing 5.7 TWh of indigenous biomethane by 2030."

"To meet Ireland's target of 5.7 TWh of biomethane by 2030, a large number of anaerobic digestion facilities will need to be developed, alongside the related infrastructure necessary to support these facilities."

In the event that a decision is made following the adoption of the revised NPF, it would be appropriate for the Planning Authority to refer to the foregoing.

4.4.3 National Development Plan 2021 – 2030

The National Development Plan[13] ('NDP' hereafter) sets out the national capital investment priorities to realise the objectives of the NPF, providing a guide for national, regional, and local planning and investment decisions during this decade. The NDP recognises that public capital investment choices over the next 10 years must not only contribute to the objective of a 51% reduction in greenhouse gas emissions by 2030 but also lay the pathway to achieve the national climate objective of net-zero greenhouse gas emissions by 2050. The Plan states that significant Exchequer investment, combined with further household, State-Owned Enterprise (SOE), and crucially private sector investment in renewable energy projects such as the Proposed Development, are critical to delivering on these climate action objectives.

The NDP sets out 10 National Strategic Outcomes (NSOs) with Strategic Investment Priorities, with a particular emphasis on Climate Action and strengthening and developing rural economies and communities. The NSOs and Strategic Investment Priorities of particular relevance to the Proposed Development are outlined below:

Reference	Description
NSO 3 - Strengthen Rural Economies and Communities	This outcome recognises the importance of rural communities and community engagement in achieving the goals of the NPF and NDP. The NDP highlights the role that rural economies and communities can play in responding to climate change across sectors and supports the sustainable development of Ireland's agri-food sector. For example, the On-Farm Capital Investment Scheme supports farmers looking to increase their environmental efficiency through, inter alia, the investment in and adoption of new technologies.

[12] Government of Ireland (Nov 2024) *Updated Draft Revised National Planning Framework*: Updated Draft Revised National Planning Framework – November 2024 -

[13] Government of Ireland (2021) *National Development Plan 2021-2030*: a36dd274-736c-4d04-8879-b158e8b95029.pdf (www.gov.ie)

NSO 8 – Transition to a Climate-neutral and Climate Resilient Society	This outcome responds to the significant commitments by the Government to tackle the effects of climate change, reduce greenhouse gas emissions by 51% by 2030 (as compared to 2018 levels), and work towards achieving net-zero greenhouse gas emissions by 2050 in line with the Climate Action and Low Carbon Development (Amendment) Act 2021 (see below). The NDP recognises the special importance of the energy sector in achieving these targets, and that radical changes may be needed to reduce our reliance on fossil fuels: *"Action in the energy sector will be critical to the achievement of Ireland's climate targets and the transformation to a high-renewable, net-zero emissions future. This will require a fundamental shift in the means by which we supply, store, and use energy."* The NDP also recognises the continued need for the supply and use of gas in Ireland, particular with regards to ensuring security of energy supply. Underpinning this theme is a commitment to a just transition, to ensuring that all people are able to participate in and benefit from the decarbonisation of economy: *"A key focus of this investment is to support the transition of the existing workforces and the creation of new enterprise and employment opportunities so that the region remains vibrant, innovative and makes the most of the opportunities that decarbonisation will bring."*
NSO 9 – Sustainable Management of Water and Other Environmental Resources	This outcome highlights the need for investment in the environmental resources and infrastructure Ireland, with a particular focus on the sustainable management of waste and water. This theme is supported by the whole-of-government Circular Economy Strategy (see below) as recognises that investments in waste management is critical to achieving an environmentally and economically sustainable future: *"While the overall focus of Government waste policy is on prevention and waste minimisation, investment in indigenous waste treatment capacity remains critical to our environmental and economic well-being."* AD facilities, such as the Proposed Development, are highlighted as one investment opportunity to achieve this NSO: *"Capacity will continue to be built in waste facilities, **including anaerobic digestion**, hazardous waste treatment, plastics processing, recycling, waste to energy, and landfill and landfill remediation, to meet future waste objectives."* [**Emphasis added**].

Consistency with the National Development Plan

Cross-sectoral investment in agriculture, energy and waste are vital to enable the timely transition to a low-carbon, climate-resilient and environmentally sustainable economy and society by 2050.

The Proposed Development directly aligns with the objectives of the NDP to strengthen rural economies and move towards an economy based on dependable and domestically sourced renewable energy. The Proposed Development is highly integrated with the just transition of the rural and agricultural communities and Circular Economy principles, in terms of the supply of agricultural waste by local farmers to be used as a resource for the sustainable production of biomethane gas and biobased fertiliser within a state of the art facility.

4.4.4 Climate Action Plan 2024

The Climate Action Plan 2024[14] ('CAP24' hereafter) is the third annual update to Ireland's Climate Action Plan, adopted by Government on the 21st of May 2024 following public consultation in early 2024. Under section 15 of the Climate Action and Low Carbon Development Act 2015, as amended, the Planning Authority must perform its functions in a manner which is consistent with the current Climate Action Plan, in so far as is practicable.

CAP24 builds upon the previous year's Plan (CAP23) by refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings. The Plan provides a roadmap for taking decisive action to halve Ireland's emissions by 2030 and reach net zero by no later than 2050, as committed to in the Climate Action and Low Carbon Development (Amendment) Act 2021.

The target for biomethane production under CAP24 is for 1TWh by 2025 and 5.7TWh by 2030.

Section 16 'Agriculture' of the CAP 2024 identifies a required reduction in annual agricultural emissions (on 2018) of 25% (17.25 $MtCO_2eq.$ per annum by 2030).

CAP24 states that the agricultural sector is the largest contributor to Ireland's greenhouse gas emissions.

CAP24 reiterates the need of the "*production of up to 1 TWh of Biomethane by 2025" and the "production of up to 5.7 TWh of Biomethane by 2030".*

Section 14 'Built Environment' consists of a key target of *"up to 0.6 TWh of heating provided by biomethane by 2025, and up to 1.1 TWh by 2030".*

Section 14.4.1 'Measures to Delivery Required Abatement' states that to meet the required level of emissions reduction, in regard to residential, by 2025 we will:

- *"Develop the appropriate policies and safeguards, as set out in chapter 16, to supply up to 0.4 TWh of biomethane to decarbonise residential heating; and*
- *Supply 0.7 TWh of biomethane to decarbonise residential heating."*

In regard to the Commercial/Public sector, by 2025 we will:

"Develop the appropriate policies and safeguards to supply biomethane for use in commercial and public buildings of up to 0.4 TWh".

Section 15.2.1.3 'Road Haulage Strategy – Decarbonisation Programme' states that *"there is a full relief from the carbon component of Mineral Oil Tax for liquid or gaseous fuels that have been produced from biomass. This means that no carbon tax applies to biofuels, such as Hydrogenated Vegetable Oil or biomethane, used in any road vehicle, private or commercial."*

Section 16.6.1 'Actions for 2024' states that *"there is also increasing potential for the use of bio-fertilisers and digestate coming from a developing biomethane industry to replace chemical*

[14] Government of Ireland (2024) *Climate Action Plan 2024:* https://www.gov.ie/en/publication/79659-climate-action-plan-2024/

nitrogen combined with more efficient use of existing animal slurries through achieving our targets for low-emission slurry spreading."

Other key measures to deliver climate adaptation in agriculture, indicated in the CAP include the following:

- RE/24/6: Increase investment in research to support agricultural and land use diversification.
- AG/24/22: Establish a Biomethane Coordination Group to oversee delivery of 5.7 TWh target and National Biomethane Strategy implementation activities.
- AG/24/21: Identify and address the research and knowledge gaps around supply of feedstocks, the role of biobased products including digestate and the sequestration potential regarding biomethane production.
- Introduce obligation in the heat sector, incentivising the production of indigenously produced biomethane.

CAP24 states that *"guided by the Food Vision 2030 Strategy, Irish farmers and food producers will be supported to continue to produce world-class food whilst reducing greenhouse gas emissions and achieving high levels of sustainability".* The Government will also take measures to promote diversification into less greenhouse-gas practices, such as biomethane feedstock production.

It is noted that the 2025 Climate Action Plan has not yet been published by government, however in the event that CAP25 is finalised prior to a decision on this application, it is the new CAP that the Planning Authority should comply with and refer to.

Consistency with CAP24

The Proposed Development directly contributes to the realisation of the aims and objectives of the Climate Action Plan as outlined above. The swift deployment of biomethane production in the state is a key objective of the CAP24, in order to meet the ambitious targets set for 2030.

The Proposed Development will also assist in achieving the steep emissions reductions required if the agricultural sector is to meet its sectoral emissions targets for 2030.

The roll-out of biomethane production is rendered all the more urgent having regard to the recently published EPA projections on Ireland's Greenhouse Gas Emissions 2023 to 2050 (published in May 2024), which warn that Ireland is currently likely to miss both its first and second carbon budget targets, in the absence of additional measures. The timely rollout of additional renewable energy generation will assist in achieving current targets, and reduce the risk of steeper emissions reductions being required in later years to achieve 2030 targets.

4.4.5 Sectoral Emissions Ceilings

Following the approval of the Carbon Budgets, Ireland's Sectoral Emissions Ceilings were agreed by Government on the 28th July 2022. Section 6C of the Climate Action and Low Carbon Development Act 2015 (as amended) (the Act) provides for the preparation of Sectoral Emissions Ceilings which set out the maximum amount of greenhouse gas emissions that are permitted in different sectors of the Irish economy.

This carbon budget programme comprises three successive 5-year Carbon Budgets as follows:

- 2021-2025: 295 Mt CO 2 eq. This represents an average reduction in emissions of 4.8% per annum for the first budget period.
- 2026-2030: 200 Mt CO 2 eq. This represents an average reduction in emissions of 8.3% per annum for the second budget period.
- 2031-2035: 151 Mt CO 2 eq. This represents an average reduction in emissions of 3.5% per annum for the third provisional1 budget.

Following the process set out in the Act, the carbon budget programme proposed by the Climate Change Advisory Council was approved by the Government on 21 February 2022, and subsequently adopted by the Oireachtas on the 6th of April 2022.

For the agriculture sector, the sectoral emissions ceilings mandate a reduction in emissions of 10% over the period from 2021-2025, and a reduction of 25% from 2026-2030.

The rollout of AD and Biomethane production helps to contribute to a reduction in agricultural emissions, while also benefiting efforts to reduce carbon emissions in other hard to abate sectors which are currently reliant on natural gas.

4.4.6 Climate Action and Low Carbon Development Acts 2015 and 2021

The first Climate Action and Low Carbon Development Act 2015[15] provided the statutory basis for the national goal of progressively pursuing a low carbon, climate resilient and environmentally sustainable economy by 2050.

In 2021 the Government passed the Climate Action and Low Carbon Development (Amendment) Act 2021[16] enshrining the target to achieve net zero emissions by 2050 and a 51% reduction in emissions by 2030 into law. The roll-out of an agri-led biomethane industry can help to decarbonise both industry and agriculture, contributing to the goals set out in the new Act.

The Climate Action and Low Carbon Development Act 2015 established the National Mitigation Plan (NMP) and National Adaptation Framework (NAF), both of which are designed to address the causes and consequences of climate change in Ireland.

Published in July 2017, the NMP represented an initial step in transitioning Ireland to a low carbon, climate resilient and environmentally sustainable economy by 2050. This whole-of-government Plan drew on the perspectives and responsibilities of a range of government departments and reflected the central roles of key ministers responsible for electricity generation, the built environment, transport, and agriculture.

The Plan acknowledges the role of the circular economy and particularly the bioeconomy, and opportunities for residues and agriculture residues such as from crops, animal, and dairy by-products to be used to produce biomaterials and biochemicals through biorefining or to produce heat and/or power through combustion or AD.

The NMP identifies the role that anaerobic digestion can play in contributing to the bioeconomy in particular, and the circular economy in general:

[15] *Climate Action and Low Carbon Development Acts 2015:* Climate Action and Low Carbon Development Act 2015 (irishstatutebook.ie)
[16] *Climate Action and Low Carbon Development (Amendment) Act 2021:* Climate Action and Low Carbon Development (Amendment) Act 2021 (irishstatutebook.ie)

"The circular economy, or bioeconomy, provides opportunities for FBB and agriculture residues, such as animal by-products (ABP), to be used to produce heat and/or power through combustion or anaerobic digestion. In addition there is potential to reduce carbon emissions along the full life cycle of the food/processing chain through food waste reduction."

The NAF provides a framework to ensure local authorities, regions, and key sectors can assess the key risks and vulnerabilities of climate change, implement actions to build resilience to climate change, and ensure climate adaptation considerations are mainstreamed into all local, regional, and national policy.

The Climate Action and Low Carbon Development Act 2021 commits the Government to moving to a climate-resilient and climate-neutral economy by the end of 2050. It sets the commitment to achieve net zero emissions by 2050 and a 51% reduction in emissions by 2030. It introduces carbon budgets for the State, and sectoral emissions ceilings.

We note in particular Section 4 of the Climate Action and Low Carbon Development Act 2021 (as amended), which states that:

"4. (8) For the purposes of performing their respective functions under this section, the Minister and the Government shall have regard to the following matters;

- *(h) the fact that the means of achieving a climate neutral economy and other measures to enable the State to pursue the national climate objective may not yet be fully identified and may evolve over time through innovation, evolving scientific consensus and emerging technologies;*

- *(n) the special economic and social role of agriculture, including with regard to the distinct characteristics of biogenic methane."*

Section 15 of the Climate Action and Low Carbon Development Act 2015, as amended, states the following:

"(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."

This places a responsibility on Planning Authorities to consider the compliance of each Proposed Development with these criteria and to make decisions which are consistent with the listed policies in so far as practicable.

The criteria are addressed in turn below to assist the Planning Authority in considering the current application and in undertaking an Environmental Impact Assessment of the Proposed Development with cognisance of the above requirement of the Act.

Consistency with Climate Action Plan

The objectives of the CAP24 (which is now the current most recent approved climate action plan) which the Proposed Development will support have been set out above.

Consistency with Long Term Climate Action Strategy

The Long-term Climate Action Strategy[17] was published on the 28th of April 2023. An update to the Strategy was published in 2024[18]. The Long-term Climate Action Strategy outlines the importance of (i) completing the actions in the Climate Action Plan, (ii) greater demand side management, (iii) better annual forecasting for the electricity and gas systems and (iv) security of gas supply infrastructure, particularly in the context of electricity generation.

The Long-term Climate Action Strategy recognises the role that biogas and biomethane can play in reducing carbon emissions in hard to abate sectors including the industrial sector.

The Strategy states:

"Key measures included in Climate Action Plan 2024 to reduce on-farm emissions include a significant reduction in nitrous oxide emissions by changing farm management practices in relation to nutrient use improved GHG efficiencies from breeding, feed modification and earlier finishing age for cattle, an increase in the proportion of organic farming, and with the waste sector providing feedstocks for the production of ***indigenous sustainably produced biomethane****."* [**Emphasis added**].

The Strategy also recognises at Page 47 that the production of zero-emission fuels including biomethane is a key driver of the pathway to industrial decarbonisation. The same page of the Strategy states:

"The 2030 target is a steppingstone towards the ambition of achieving climate neutrality, with a relatively clear trajectory for the sector to 2050. Achieving a fully decarbonised industry sector will require; driving material efficiency in construction to reduce embodied energy in materials; employing heat pumps for low-temperature heat and ***zero emissions gas/ bioenergy*** *for high-temperature heat; fully switching fuel used for cement (e.g., waste, bioenergy) and alumina; and utilising CCS and innovative binders in cement."* [**Emphasis added**].

The Proposed Development will support the achievement of the goals and objectives of the Long-term Climate Action Strategy.

Consistency with Approved National Adaptation Framework and Approved Sectoral Adaptation Plans

The National Adaptation Framework (NAF hereafter) (DECC, 2024) has outlined several actions to help ensure a targeted approach to achieving climate resilience into the future

[17] Long-term Strategy on Greenhouse Gas Emissions Reductions 2023. https://www.gov.ie/en/publication/e4e81-long-term-strategy-on-greenhouse-gas-emissions-reductions/

[18] Long-term Strategy on Greenhouse Gas Emissions Reductions 2024. https://www.gov.ie/en/publication/e4e81-long-term-strategy-on-greenhouse-gas-emissions-reductions/#:~:text=Ireland%E2%80%99s%20Long-term%20Strategy%20on%20Greenhouse%20Gas%20Emissions

Section 2.2 of the NAF states, that for climate resilience, Ireland must be open to innovative climate change solutions. It must have a reduced reliance on fossil fuel, will need to transition towards sustainable agricultural practices such as agroforestry and organic farming and Irish industries must embrace circular economy principles.

The NAF provides key guiding principles for climate adaptation, grouped into high-level themes including: 'Adaptation governance, engagement and resourcing': *"Mobilise Existing and New Resources: Maximise the efficient use of existing and new resources, including financial, human, and natural resources, to achieve adaptation."*

Section 2.6.4 of the NAF outlines the role of the private sector in enabling climate change adaptation. *"Businesses and industries, being both affected by climate change impacts and contributors to adaptation efforts, are at the forefront of developing and implementing innovative technologies and practices to enhance climate resilience.* ***This entails investments in renewable energy, sustainable agriculture****, and efficient water management systems, for example. Collaborative partnerships with the government further empower businesses to fulfil their role in climate adaptation by pooling resources and expertise, innovation, fostering green job opportunities, and collectively working towards a more sustainable and resilient future for Ireland."* [**Emphasis added**].

Section 2.9 of the NAF outlines the future research prioritise for climate change adaptation in Ireland including the following:

- ***"Ecosystem Resilience:*** *Understanding how ecosystems respond to climate change is crucial. Research into the adaptation of natural environments, biodiversity, and the sustainable management of natural resources will be essential."*
- *"****Infrastructure Adaptation:*** *Investigating how infrastructure, such as buildings, transportation, and energy systems, can be made more resilient to climate impacts, including retrofitting, sustainable design, and disaster preparedness."*
- *"****Agriculture and Food Security:*** *Given the importance of agriculture in Ireland, research into climate-resilient farming practices, crop and livestock management, and the impact of climate change on food security will be critical."* [**Emphasis added**].

The NAF outlines the potential impacts of the electricity and gas networks sector from climate change:

- Water shortages and drought may affect the availability of cooling at conventional power plants,
- Changes in rainfall distribution could reduce hydro power generation during certain seasons, while increasing the role of hydro station flood alleviation.
- Floods may damage electricity and gas transmission systems, and coastal erosion could impact infrastructure.
- Increased wind variability may require backup generation or storage, and strong winds may lead to turbine shutdown or damage.

Climate proofing of the project was undertaken using the approaches outlined in the *Guidance on Integrating Climate Change and Biodiversity into Environmental Impact Assessment* (EC, 2013) and *IEMA EIA Guide to Climate Change Resilience and Adaptation* (IEMA, 2020). Both documents outline a methodology for undertaking a risk assessment where there is a potentially significant impact on the project receptors due to climate change.

Furtherance of the National Climate Objective

Under the Climate Action and Low Carbon Development Act 2015 (as amended by the 2021 amendment Act). The National Climate Objective is as follows:

"The State shall, so as to reduce the extent of further global warming, pursue and achieve, by no later than the end of the year 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy."

The Proposed Development will reduce GHG emissions and help to decarbonise Ireland's energy system by generating renewable gas to displace fossil fuels. The digestate produced by the Proposed Development (which will be a bio-based fertiliser) will also displace chemical fertilisers, which are generally produced using fossil fuels. The development will directly further the National Climate Objective.

The Objective of Mitigating Greenhouse Gas Emissions and Adapting to the Effects of Climate Change in the State

The Proposed Development, which comprises a renewable energy development, directly addresses the need to mitigate greenhouse gas emissions by producing renewable energy to displace conventional natural gas in the gas grid.

The development serves to directly mitigate GHG emissions and to improve the resilience of the state to climate change by enhancing security of renewable energy supply.

4.4.7 Support Scheme for Renewable Heat (SSRH)

This support scheme[19] was developed to contribute towards Ireland's 2020 renewable energy and emission reduction targets. It focuses on support mechanism to increase the energy generated from renewable sources in the heat sector, including an on-going operation support for biomass boiler and AD heating systems. This scheme aims to incentivise the development and Biomethane Utilisation and Renewable Gas Certification

The SSRH comprises an installation grant for heat pumps and an operational support (an ongoing payment for up to 15 years) for biomass and anaerobic digestion (biogas) heating systems. The SSRH was developed to incentivise the delivery of an additional 3% of heat use in Ireland to come from renewable sources. The current National Development Plan includes an allocation of €300 million for the rollout of the SSRH for the period up to 2027.

Gas Networks has recognised that there is significant growth in demand from households and businesses looking to source sustainable fuel alternatives that have been produced in Ireland. They state that:

"Gas Networks Ireland registers and issues certificates to Irish producers that inject renewable gas into the gas network. This includes biomethane, which is a renewable gas produced by anaerobic digestion of biodegradable matter that is then upgraded to network entry specifications prior to injection. Each certificate represents our guarantee that the equivalent

[19] Department of the Environment, Climate and Communications (2019) *Support Scheme for Renewable Heat (SSRH):* gov - Support Scheme for Renewable Heat (SSRH) (www.gov.ie)

amount of renewable gas has been injected into the gas network."[20]

AD facilities must be compliant with the requirements of Gas Networks Ireland's Renewable Gas Certification for the export and utilisation of biogas. This certification system is in place to ensure that natural gas produced in Ireland is compliant with relevant legislation, and to assure customers that their gas has been generated in a sustainable manner. This is also relevant to ensure that gas produced aligns with EU policies and guidance, such as the EU Methane Strategy (2020) which estimates that by 2050, the EU's annual consumption of biogas and biomethane will increase to between 54 and 72 Mtoe (up from c.17 Mtoe in 2017).

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

The White Paper[21] sets out a framework to guide policy and the actions that the Government intends to take in the energy sector from 2015 up to 2030.

We note in particular Section 133 on bioenergy, which sates:

"Bioenergy is a versatile source of energy that can be used for heating, transport, and power generation. The most advantageous economic benefits arise when it is used for heating. Bioenergy encompasses a range of fuels in solid, liquid, and gaseous forms, including forest-based biomass, dry agricultural residues, energy crops, organic materials including wastes, and landfill gas and other biogases. ***Bioenergy can contribute to broader policy objectives such as waste recovery and rural development, as is the case with anaerobic digestion, which not only generates energy, but also gives effect to national waste policy in terms of utilising waste as a resource.*** *It has been highlighted in waste management plans as a technology suitable for development at a local and regional level and at varying scales.* ***Anaerobic digestion also has the potential to improve air quality, for example through mitigation of ammonia emissions and odour by diverting slurry from land spreading.*** *However, expanding the uptake of bioenergy involves several challenges, including the availability of sufficient sustainably-sourced biomass, competition with other land uses such as food production, and the cost of support. Consideration must be given to the most prudent uses for bioenergy."* [**Emphasis added**].

We also note Section 136 on waste policy, which states:

"Waste Management Policy in Ireland recognises the need to develop efficient ways to extract as much value as possible from waste in accordance with the requirements of the waste hierarchy and the opportunity for waste to be used as an indigenous energy resource [34]. In this regard, three new regional waste management plans for the period 2015-2021 support the development of additional thermal recovery and biological treatment capacity within the State. The REFIT schemes, which support the generation of electricity and CHP technologies including waste-to-energy, anaerobic digestion, and landfill gas, continue to support the use of waste as a renewable energy feedstock."

[20] Gas Networks Ireland, *Renewable Gas Certification:* Renewable gas certification (gasnetworks.ie)
[21] Department of Environment, Climate and Communications (2020) *The White Paper:* Department of Communications, Energy and Natural Resources - Ireland's Transition to a Low Carbon Energy Future - 2015-2030 - e5aa9f25-da81-43eb-804d-57309615681e.pdf (www.gov.ie)

4.4.9 Biomethane Energy Report – Gas Networks Ireland

While not a policy or guidance document, the Biomethane Energy Report was published by GNI, who are the public body responsible for connecting customers to the gas network and for connecting developments such as the Proposed Development to the grid. The Energy Report provides a detailed insight into the potential for biomethane production in Ireland. The Gas Networks Ireland (GNI) Biomethane Report[22] provides a rationale for accelerating biomethane production in Ireland and states the following:

- *"Domestically produced biomethane, dispersed throughout the country, boosts security of supply and can displace fossil gas from Corrib as it declines;*
- *Similar to the early years of the wind industry, the biomethane gate price is currently more expensive than natural gas.;*
- *Biomethane could rapidly reduce climate emissions across hard to abate energy demand sectors and can create negative emissions;*
- *Biomethane production boosts employment in rural areas, promotes circular economy in agriculture, and can improve soil health. Digestate, a byproduct of biomethane production can displace fossil produced fertilizer;*
- *Biomethane can deliver highly valuable energy, which is dispatchable, suitable for intensive heat industries, transport and other hard to abate sectors; and*
- *Biomethane is produced with existing technology and can therefore be rapidly scaled up. It can also be transported, stored, and distributed through existing gas grids."*

The GNI report refers to the Climate Action and Low Carbon Development (Amendment) Bill. In 2021 the Bill was *"signed into law and Ireland is now on a legally binding path to net-Zero emissions no later than 2050, and to a 51% reduction in emissions by the end of this decade".*

Section 6 of the report states that after the Russian invasion of Ukraine, *"Ireland must ensure that security of energy supply is maintained as Ireland transitions to a net-zero emissions future".*

The report concludes by stating that *"Ireland has a real opportunity to develop a biomethane industry at scale, which will offer multiple benefits for our agricultural economy, assist in the decarbonisation of Ireland's economy more generally, enhance our security of energy supply and lead to the development of a key renewable indigenous energy resource in the build-up to 2030".*

4.4.10 Energy Security in Ireland to 2030

The Government Strategy for Energy Security in Ireland to 2030 was published in November 2023.

Energy Security in Ireland to 2030 outlines a new strategy to ensure energy security in Ireland for this decade, while ensuring a sustainable transition to a carbon neutral energy system by 2050. This report is being published as part of an Energy Security Package, containing a range

[22] Gas Networks Ireland, *Biomethane Energy Report:* The Biomethane Energy Report (gasnetworks.ie)

of supplementary analyses, consultations, and reviews, which have informed the recommendations and actions related to energy security.

Informed by the Government's energy security policy objectives - to ensure energy is affordable, sustainable, and secure - the review considered the risks to oil, natural gas, and electricity.

The strategy states that "*the National Biomethane Strategy in development sets us on a trajectory to develop a new source of renewable indigenous gas in Ireland*".

The strategy is clear that Biomethane has an important role to play in supporting Ireland's energy transition, while maintaining and safeguarding security of supply through indigenous renewable gas generation.

4.4.11 National Policy Framework on Alternative Fuels Infrastructure for Transport in Ireland

The National Policy Framework on Alternative Fuels Infrastructure for Transport in Ireland: 2017-2030[23] sets an ambitious target that from 2030 all new cars and vans sold in Ireland will be zero emission (or zero emission-capable) and that other technologies, perhaps still unknown, will be fueling larger vehicles, so that by 2050, the nation's car fleet, along with much of our public transport buses and rail lines, will be low/near zero emissions.

The framework highlights the importance of greater diversification of fuels in the freight sector to include a mix of natural gas, biogas/biomethane, electricity and renewable diesel or other biofuels.

4.4.12 Ag Climatise – National Climate & Air Roadmap for the Agriculture Sector

The National Climate & Air Roadmap for the Agriculture Sector[24] sets an ambitious vision for a 'climate neutral agriculture sector by 2050' and includes 29 actions with specific and targets aimed at reducing the environmental footprint and further building on the strong credentials of Irish Agriculture. Of particular relevance to the Proposed Development are the following action and targets:

Reference	Targets
Action 20	Engage with stakeholders to maximise the potential opportunities from Anaerobic Digestion for the agriculture sector. Work closely with DCCAE and other key stakeholders to set a target for the level of energy to be supplied by indigenous biomethane injection and consider the necessary supports including funding mechanisms. Work with DCCAE and other stakeholders to develop the necessary research, policies, and measures to provide policy certainty around the development of an Anaerobic Digestion industry in Ireland.

The roadmap recognises that the agriculture sector has a key role to play in the provision for

[23] Department of Environment, Climate and Communications (2017) *National Policy Framework on Alternative Fuels Infrastructure for Transport in Ireland:* *6186_NPF_Alternative Fuels_V5.indd - 6ce8a48a99c44e1dbf40a59a073cb06d.pdf (www.gov.ie)*

[24] Department of Agriculture, Food and the Marine (2020) *A Roadmap towards Climate Neutrality:* *7c8b812c-d857-4f39-96b9-1e7f134ba896.pdf (www.gov.ie)*

bio-energy feedstocks for the production of biogas/biomethane as a key renewable energy resource for the decarbonisation of the transport and heat sectors in particular.

4.4.13 National Energy and Climate Plan (NECP) 2021-2030

Ireland's National Energy & Climate Plan[25] (NECP hereafter) 2021-2030 was submitted to the European Commission in December 2018. The Plan outlines a long-term vision for the agriculture, forest and land use sectors based on an approach to carbon neutrality in these sectors, which does not compromise the capacity for sustainable food production. This effectively means that agricultural emissions are balanced by reducing emissions of methane, nitrous oxide, and carbon dioxide in so far as the best available science allows, increasing carbon-sequestration through forests and land use and displacing fossil fuel and energy intensive materials with renewable sources.

The NECP set an indicative target of 1.6 TWh/yr (Terawatt hour per year) for the level of energy to be supplied by indigenous biomethane injection in 2030, taking account of the domestic supplies of feedstock that meet strict sustainability criteria and agreed a commitment to consider how the supports necessary to reach this target would be funded.

The NECP stated the following:

"In the absence of certainty in relation to the mechanism by which biomethane will be supported, it is proposed to set an indicative target which will be reviewed in 2023 as part of the review process for the National Energy and Climate Plan. This review will take into account the development of supports and market development for biomethane and progress towards the indicative target. The indicative target for indigenous biomethane is therefore set at 1.6 TWh and will be reviewed in 2023."

As noted previously in this EIAR chapter, the CAP24 include the following key actions relevant to the development of a biomethane industry in Ireland, including:

- *"By 2025 – Production of up to 1 TWh of Biomethane by 2025; Construction of up to 20 AD plants of scale; and*
- *By 2030 – Production of up to 5.7 TWh of Biomethane by 2030; Construction of up to 200 AD plants of scale."*

This represents a significant uplift in the targeted level of biomethane production by 2030 vis a vis the National Energy and Climate Plan.

4.4.14 The Planning and Development Act 2000 (as amended)

The Planning and Development Act 2000[26] (as amended) also sets out provisions for climate change within Section 10 (2) (n). This includes requirements to:

- reduce energy demand in response to the likelihood of increases in energy and other costs due to long-term decline in non-renewable resources,
- reduce anthropogenic greenhouse gas emissions, and

[25] Department of Environment, Climate and Communications (2020) *National Energy and Climate Plan 2021-2030:* NECP_DRAFT_BRANDED - f3e50986-9fde-4d34-aa35-319af3bfac0c.pdf (www.gov.ie)
[26] *Planning and Development Act 2000:* Planning and Development Act, 2000 (irishstatutebook.ie)

- address the necessity of adaptation to climate change; in particular, having regard to location, layout, and design of new development.

The Planning and Development Act, as amended also transposes the requirements of the EIA Directive and provides the framework within which the Planning Authority, as competent authority, will undertake EIA of the current development proposal. It is noted that the Planning and Development Act 2024 has been passed, and is due to be commenced on a phased basis during 2025 and early 2026. At time of writing, the EIA and application process provisions of the 2000 Act remain in force.

4.4.15 Whole of Government Circular Economy Strategy 2022 – 2023

The Whole of Government Circular Economy Strategy 2022-2023[27] is Ireland's first national circular economy strategy. It serves as a driver for the Irish government to achieve a 51% reduction in overall greenhouse gas emissions by 2030 and to reach net-zero emissions by no later than 2050, as per commitments in the Programme for Government and the Climate Act 2021. The strategy was a specific commitment in the Waste Action Plan for a Circular Economy (see below).

The Strategy states:

*"In Europe today, just **16% of bio-waste is recycled into something useful.** The EU has set a **target by 2035 of 65% of bio-waste to be reused or recycled.** In Ireland, the agri-food and municipal wastewater treatment sectors together produce over 100,000 tonnes of bio-waste per year. This waste is largely applied to agricultural land or disposed of as waste, thereby missing the opportunity for recycling into energy."*

This strategy also discusses the role of the bioeconomy in transitioning to a carbon-neutral and circular economy. It describes the bioeconomy as:

"… the part of our economy which uses renewable resources such as crops, forestry, and fisheries to produce food, products, as well as energy, while also reducing waste. Increasing the scope of the bioeconomy will mean diminishing our reliance on fossil-based fuels and carbon intensive resources and will boost our use of renewable biological resources."

4.4.16 A Waste Action Plan for a Circular Economy Strategy 2020-2025

This plan[28] provides a roadmap for cross-sectoral waste planning and management in Ireland. It broadly discusses the role of the Circular Economy in achieving the Sustainable Development Goals, including SDG7 'Affordable and Clean Energy'.

Among the measures outlined to achieve the optimum results of the Waste Action Plan is the following, which commits to the development of a government circular economy strategy (see above):

"One of its first tasks will be the development of a high-level all of government circular economy strategy. This will set a course for Ireland to transition across all sectors and at all levels of government toward circularity. Policy coherence across government will be key to ensuring all

[27] Department of Environment, Climate and Communications (2021) *Whole of Government Circular Economy Strategy 2022-2023:* bd90130d-494e-4d32-8757-46d36c77b912.pdf (www.gov.ie)
[28] Government of Ireland (2020) *A Waste Action Plan for a Circular Economy: Ireland's National Waste Policy 2020-2025:* dcf554a4-0fb7-4d9c-9714-0b1fbe7dbc1a.pdf (www.gov.ie)

policy levers are set towards the same objective."

We note in particular the following:

"We want to realise the Anaerobic Digestion (AD) and composting potential of the food waste resource. AD and composting provide opportunities for regional development with benefits for communities through sales of locally generated energy and compost."

4.4.17 National Policy Statement on the Bioeconomy (2018)

This national policy statement[29] elaborates on how the strategic development of the bioeconomy might be advanced through greater policy coherence across all relevant sectors and dealing with fundamental challenges to its commercial success and social development. It outlines Ireland's comparative advantages in developing bioeconomy and provides commitments in the form of a Policy Framework for Developing the Bioeconomy.

4.4.18 Common Agricultural Policy (CAP) Strategic Plan 2023 – 2027

First established in 1962, the CAP23[30] (as revised) consists of a Two Pillar Structure: Pillar 1 Income Support (including Basic Payment Scheme and Greening) and Pillar 2 Infrastructure, Environment and Development Support (including GLAS, EIP-AGRI and TAMS).

4.4.19 European Union (Waste Directive) Regulations 2020[31]

This Statutory instrument sets out regulations for the mode by which waste compost and digestate is recycled into fertiliser products. We note in particular the following replacement of Regulation 38 in the Regulations of 2011 (Bio-waste):

"38 (2): The Minister shall take measures in accordance with sections 21A and 32(1) of the Act of 1996 to: (a) encourage the recycling, including composting and digestion, of bio-waste in a way that fulfils a high level of environment protection and results in output which meets relevant high-quality standards."

4.4.20 Environmental Protection Agency (Industrial Emissions) (Licensing) Regulations, 2013[32] and Waste Facility Permitting

All operators of an AD Facility require consent to operate under one of the following: Waste Management Act, 1996[33] (as amended), the Environmental Protection Agency Act, 1992[34], the Environmental Protection Agency (Industrial Emissions) (Licensing) Regulations, 2013[35], S.I. No. 821 of 2007, Waste Management (Facility Permit and Registration) Regulation (as amended 2008), the Industrial Emissions Directive (2010/75/EU) which introduced a class of

[29] Government of Ireland (2018) *National Policy Statement on the Bioeconomy:* gov - National Policy Statement on the Bioeconomy (www.gov.ie)
[30] Department of Agriculture, Food and the Marine (2020) *The CAP Strategic Plan 2023-2027*: gov - The CAP Strategic Plan 2023 - 2027 (www.gov.ie)
[31] Gov. of Ireland: *European Union (Waste Directive) Regulations 2020:* S.I. No. 323/2020 - European Union (Waste Directive) Regulations 2020 (irishstatutebook.ie)
[32] Gov. Of Ireland (2013) *Environmental Protection Agency (Industrial Emissions) (Licensing) Regulations 2013:* S.I. No. 137/2013 - Environmental Protection Agency (Industrial Emissions) (Licensing) Regulations 2013. (irishstatutebook.ie)
[33] *Waste Management Act, 1996:* Waste Management Act, 1996 (irishstatutebook.ie)
[34] *Environmental Protection Agency Act, 1992:* Environmental Protection Agency Act, 1992 (irishstatutebook.ie)
[35] *S.I. No. 137/2013:* S.I. No. 137/2013 - Environmental Protection Agency (Industrial Emissions) (Licensing) Regulations 2013. (irishstatutebook.ie)

license that can be granted by the EPA, known as an Industrial Emissions License.

S.I. No. 821 of 2007 Waste Management (Facility Permit and Registration) Regulation (as amended)[36] sets out the procedures for the making of applications for waste facility permits for the purposes of section 39(4) of the Waste Management Act, 1996, and the manner by which a waste authorisation can be granted by the EPA. The Regulations also provide rules pertaining to public consultation, consideration by the local authorities of submissions in relation to permit applications, and the grant, refusal, and review of permits by local authorities. They also prescribe rules for the spreading of organic waste on land from waste facilities and other matters relative to organic waste.

4.4.21 Animal By-Products Regulations

In order to build and operate a biogas plant, an operator must comply with the European Communities (Animal By-Products) Regulations 2014 (S.I. No. 187 of 2014)[37] and in accordance with Regulation (EC) No. 1069/2009 and Regulation (EU) No. 142/2011. If animal by-products are processed within the AD facility, certification may be required and obtained from the Department of Agriculture, Food, and the Marine.

Document 'CN11 – Conditions for Approval and Operation of Biogas Plants Transforming Animal By-Products and Derived Products in Ireland' provides details on the requirements of a biogas plant such as that proposed here. These include general requirements including animal by-product feedstocks, structural and equipment requirements, plant operational requirements, requirements for microbiological testing, Plant HACCP Plans and Plant Pre-requisite Programmes (PRPs), and record keeping requirements.

4.5 Regional Planning Policy

4.5.1 Regional Spatial and Economic Strategy for the Southern Region

The Regional Spatial & Economic Strategy for the Southern Region[38] ('RSES' hereafter) determines at a regional scale how best to achieve the shared goals set out in the NPF.

The RSES acknowledges that the effects of climate change will be felt in the environment, society, and the economy of the Southern Region. Out of the 11 key goals of the RSES, we highlight the following as being of particular relevance for the Proposed Development:

Reference	Regional Policy Statements
Statement 3 – Strengthened Rural Economies and Communities	Strengthening the role of and improving quality of life in the Region's diverse rural areas and communities and valuing our rural Region as dynamic, resilient and outward looking.
Statement 8 – Low Carbon, Climate Resilient and Sustainable Society	Safeguarding and enhancing our environment through sustainable development, prioritising action on climate change across the Region, driving the transition to a low carbon and climate resilient society.
Statement 9 – Sustainable, Planned	Providing infrastructure and services in a sustainable, planned and infrastructure-led manner to ensure the sustainable management of water waste and other environmental resources.

[36] Gov. of Ireland: *Waste Management (Facility Permit and Registration) Regulations 2007*: S.I. No. 821/2007 - Waste Management (Facility Permit and Registration) Regulations 2007 (irishstatutebook.ie)
[37] *European Union (Animal By-Products) Regulations 2014:* S.I. No. 187/2014 - European Union (Animal By-Products) Regulations 2014. (irishstatutebook.ie)
[38] Southern Regional Assembly (2020) *RSES*: Southern Regional Assembly (southernassembly.ie)

and Infrastructure-led Development	

The RSES identifies the significance of the threat of climate change in Chapter 5, stressing the importance to transition to a low carbon economy. The Regional Assembly, evident from the RSES, is committed to implement regional policy consistent with national Climate Action Plans.

We note the following Regional Policy Objectives (RPOs) as being of particular relevance for the Proposed Development:

RPO 44 – Common Agricultural Policy: *"It is an objective to ensure the delivery of sustainable actions under the Rural Development Programme (RDP) 2014-20 and beyond in priority areas of innovation, bio-diversity restoration, water and soil management, renewable energy and waste management, carbon conservation and sequestration, diversification, job creation and ICT development in our rural areas"*

RPO 50 – Diversification: *"It is an objective to further develop a diverse base of smart economic specialisms across our rural Region, including innovation and diversification in agriculture (agri-Tech, food and beverage), the marine (ports, fisheries and the wider blue economy potential), forestry, peatlands, renewable energy, tourism (leverage the opportunities from the Wild Atlantic Way, Ireland's Ancient East and Ireland's Hidden Heartlands brands), social enterprise, circular economy, knowledge economy, global business services, fin-tech, specialised engineering, heritage, arts and culture, design and craft industries as dynamic divers for our rural economy."*

RPO 56 – Low Carbon Economy:

a) *"The RSES recognises the urgency to transition to a low carbon future and it is therefore an objective to accelerate the transition towards low carbon economy and circular economy."*
b) *"It is an objective to develop enterprises that create and employ green technologies."*
c) *"Local authorities should ensure that the development of green industry and technologies incorporates careful consideration of potential environmental impacts at project level including the capacity of receiving environment and existing infrastructure to serve new industries."*

RPO 58 – Bio-economy and Rural Areas: *"It is an objective to facilitate the development of the rural economy through supporting a sustainable and economically efficient agricultural and food sector, together with the bioeconomy."*

RPO 87 – Low Carbon Energy Future: *"The RSES is committed to the implementation of the Government's policy under Ireland's Transition to a Low Carbon Energy Future 2015-30 and Climate Action Plan 2019. It is an objective to promote change across business, public and residential sectors to achieve reduced GHG emissions in accordance with current and future national targets, improve energy efficiency and increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport and agriculture."*

RPO 89 – Building Resilience to Climate Change: *"It is an objective to support measures to build resilience to climate change throughout the Region to address impact reduction, adaptive capacity, awareness raising, providing for nature-based solutions and emergency planning."*

RPO 90 – Regional Decarbonisation: *"It is an objective to develop a Regional Decarbonisation Plan to provide a framework for action on decarbonisation across all sectors."*

RPO 94 – Decarbonisation in the Agricultural Sector: *"It is an objective to support initiatives that advance an approach to achieve carbon neutrality for agriculture and land-use that does not compromise sustainable food production."*

RPO 95 – Sustainable Renewable Energy Generation: *"It is an objective to support implementation of the National Renewable Energy Action Plan (NREAP), and the Offshore Renewable Energy Plan and the implementation of mitigation measures outlined in their respective SEA and AA and leverage the Region as a leader and innovator in sustainable renewable energy generation."*

RPO 96 – Integrating Renewable Energy Sources: *"It is an objective to support the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure to integrate renewable energy sources and ensure our national and regional energy system remains safe, secure and ready to meet increased demand as the regional economy grows."*

RPO 98 – Regional Renewable Energy Strategy: *"It is an objective to support the development of a Regional Renewable Energy Strategy with relevant stakeholders."*

RPO 112 – Water Quality: *"It is an objective to support commitments to achieve and maintain "At Least Good" status, except where more stringent obligations are required, and no deterioration of status for all water bodies under the Marine Strategy Framework Directive and its programme of measures, the Water Framework Directive and the River Basin Management Plan."*

RPO 219 – New Energy Infrastructure: *"It is an objective to support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers (subject to appropriate environmental assessment and the planning process) to ensure the energy needs of future population and economic expansion within designated growth areas and across the Region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs."*

RPO 225 – Gas Network: *"Subject to appropriate environmental assessment and the planning process where required, it is an objective to:*

- *Promote renewable gas leading to carbon emission reduction in agriculture, industry, heating and transport as well as sustainable local employment opportunities; and*
- *Support investment in the sustainable development of agricultural biogas sector and regional gas supply projects which strengthen gas networks in the Region and assist integration of renewable gas to the grid network."*

RPO 102 – Energy Resource Funding: *"It is an objective to support initiatives for energy research funding within our Region to accelerate diversification away from fossil fuels to green energy, including the potential of wind, wave, solar, biomass, biofuels, biogas and hydrogen in the Region."*

Section 8.3 'Gas Networks' of the RSES states that *"Gas Networks Ireland are committed to integrating indigenous renewable has production, including biogas derived from waste… . There is significant potential for the Region to lead in the integration of the biogas sector and biogas production as a core element of sustainable agriculture, developing a significant indigenous renewable energy industry".*

Statement of Consistency with the Regional Spatial and Economic Strategy

The RSES highlights the agricultural and energy sectors as key sources of emissions and recognises that there is a capacity in the region to supply the infrastructure required to reduce the carbon impact of these sectors and to generate renewable energy.

AD facilities apply the principles of the bioeconomy and circular economy, by utilising biomass as a resource for the use and long-term security of renewable energy across the region. Such facilities also contribute to the competitiveness of the agricultural sector, by encouraging the use of green technologies and other mitigation / adaptation opportunities. As such, this proposal is compliant with and supported by the RSES for the Southern Region.

4.6 Local Planning Policy

4.6.1 Limerick Development Plan 2022-2028

The Limerick Development Plan 2022 – 2028[39] ('CDP' hereafter) recognises the central role of land use planning in promoting a low carbon society, mitigating the impact of climate change, and progressing towards a sustainable energy future for County Limerick.

The CDP aligns with the NPF, by recognising the role that rural areas play in driving the economy, for example by attracting entrepreneurship and innovation development, particularly where low carbon outputs can be achieved. The CDP also contains development management standards, policies and objectives and references statutory guidelines which will inform decision making over the period of the CDP.

The Strategic Vision of the CDP for Limerick is as follows:

"Limerick – A Green City Region on the Waterfront By 2030, Limerick will become a green City region on the Shannon Estuary connected through people and places. This will be achieved through engagement, innovation, resilient urban development and self-sustaining rural communities."

Underpinning this vision, the CDP provides the following 'Key Ambitions':

1. **A Green Region:** ***"Limerick will develop as an environmentally sustainable and carbon neutral economy*** *- a pioneer in sustainable growth. This will be underpinned by the promotion of active mobility for all, creating an attractive and distinctive place to live, work and visit."* [**Emphasis added**].

2. **Embracing the River Shannon:** *"Limerick will provide room for people to enjoy the River Shannon/ Estuary. The animation of the waterfront will increase public access and create new recreational opportunities for residents and visitors."*

3. **Resilient, Connected and Inclusive Communities:** *"The future development of Limerick will make it easier to live sustainably and be well prepared for the future, increasing opportunities for movement and connectivity between communities."*

4. **A Sustainable, Innovative and Competitive Economy:** *"The Limerick region will be an inclusive,* ***self-sustaining economy built on growth and innovation*** *and which*

[39] LC&CC (2022) *CDP 2022-2028:* Limerick-Development-Plan-Volume-1-Written-Statement-including-Variation-No-1.pdf

maximises its competitive edge. This will enhance local enterprises, attract international investment in a manner which guarantees quality of life." [**Emphasis added**].

The vision is also underpinned by a number of interlinked strategic objectives. The following are of relevance to the Proposed Development:

- *"Grow Limerick's economy and create opportunity through maximising the potential for development through the promotion and enhancement of the competitive advantages of Limerick, including its strategic location, connectivity and accessibility to international markets, a skilled workforce and a high quality of life. The Limerick brand shall be used to internationalise the city. Any further brands created within and by the Local Authority, including organisations owned by the Local Authority, shall work within the framework outlined in the 'Limerick Atlantic Edge, European Embrace' brand.*

- *Transition to an environmentally sustainable carbon neutral economy.*

- *Create a competitive environment in which to do business. Promote, support and enable sustainable and economic development, enterprise and employment generation. Focus in particular on areas which are accessible by public and sustainable modes of transport. Enable settlements and rural areas to become self-sustaining through innovation and diversification of the rural economy.*

- *Protect, enhance and ensure the sustainable use of key infrastructure, through the provision of support to utility providers including water supplies and wastewater treatment facilities, energy supply including renewables, broadband and transportation. This plan will also foster the linkages to transition from linear model to a circular model which keeps resources in use for as long as possible."*

The Proposed Development will contribute to achieving the vision, key ambitions, and strategic objectives of the CDP by delivering renewable energy in a manner which directly benefits the local community and economy, while also helping to decarbonise the agricultural sector in the locality, enhancing climate resilience.

4.6.1.1 Zoning and Designation Specific to the Site

The Site is not subject to specific zoning pertaining to its rural locality. The Site is located c. 5.9km west (as the crow flies) of the small town of Bruree. Bruree is designated as a 'Level 4 Large Village' within the CDP.

The Site is not subject to any designations for protected structures, protected views or scenic routes. The Site is not subject to any tree protection orders, nor does it contain any trees of special amenity value.

4.6.1.2 Sites of Archaeological and Architectural Importance

The table below outlines the sites/features recorded in the Sites and Monuments Records and the National Inventory of Architectural Heritage, of the National Monuments Service 'Archaeological Survey of Ireland' (Department of Housing Local Government and Heritage).

According to this data base, as seen in the table below, there are no recorded sites/features of archaeological or architectural importance in relevant proximity to the Site.

Sites/Features of Archaeological and Architectural Importance in the Wider Area			
Type	**ID**	**Latitude and Longitude**	**Approx. Location**
Ringfort - rath	LI038-129	52.435491 , -8.756535	170m northwest
Ringfort - rath	LI038-130	52.434378 , -8.749339	80m east
Mound	LI038-156	52.434740 , -8.746051	325m east

Source: National Parks and Wildlife Services – Historic Environment Viewer

There are 2 no. structures recorded by the 'National Inventory of Architectural Heritage' in proximity to the Site:

National Inventory of Architectural Heritage – Recorded Structures in Proximity to the Site				
Name	**ID**	**Rating**	**Coordinates**	**Approx. Location**
Glenbrook House: Well	21903819	Regional	149329, 131689	330m east
Glenbrook House: country house	21903811	Regional	149200, 131830	258m northeast

Source: National Parks and Wildlife Services – Historic Environment Viewer

4.6.1.3 Landscape Character

We take note of CDP **Policy EH P8 (Landscape Character Areas):** *"It is a policy of the Council to promote the distinctiveness and where necessary safeguard the sensitivity of Limerick's landscape types, through the landscape characterisation process in accordance with the Draft Guidelines for Landscape and Landscape Assessment (2000) as issued by the Department of Environment and Local Government, in accordance with the European Landscape Convention (Florence Convention) and with A National Landscape Strategy for Ireland – 2015- 2025. The Council shall implement any relevant recommendations contained in the Department of Arts, Heritage and the Gaeltacht's National Landscape Strategy for Ireland, 2015 – 2025."*

According to the Landscape Character Assessment map (Map 6.1 of the CDP), the Site is located within the 'Agricultural Lowlands'. According to Table 6.2 'Rural Landscape Character Areas' the following is a description of the Agricultural Lowlands:

"This is the largest of the Landscape Character Areas in Limerick and comprises almost the entire central plain. This landscape is a farming landscape and is defined by a series of regular field boundaries, often allowed to grow to maturity. This well-developed hedgerow system is one of its main characteristics. In terms of topography, the landscape is generally rather flat with some locally prominent hills and ridges. The pastoral nature of the landscape is reinforced by the presence of farmyards."

We take note of the following specific objectives pertaining to the 'Agricultural Lowlands' landscape character type:

a) *"Encourage, where housing is permitted, design that reflects existing housing stock, such as the two-storey farmhouses which are a feature in the area.*

b) *Encourage retention of existing landscape features such as hedgerows and trees and their incorporation into landscaping for new developments.*

c) *Discourage development of locally prominent sites.*

d) *Encourage the regular arrangement of turbines with equal spacing in proposed wind farm developments, which take field boundaries into account.*

e) *Encourage development within existing settlements."*

According to Map 6.2 'Views and Prospects' within the CDP, there are no protected views in proximity to the site.

The landscape and visual impact of the Proposed Development is addressed in detail within the EIAR submitted along with the application, based on the preparation of a range of photomontages, which demonstrates the ability of the Proposed Development to integrate effectively into its local visual environment.

4.6.1.4 Chapter 5: A Strong Economy

Policy ECON P2 (Economic Development and Enterprise) states:

"It is a policy of the Council to work in partnership with Enterprise Ireland, IDA Ireland, adjoining Local Authorities, the Regional Assembly and all other relevant agencies to promote, facilitate and enable sustainable enterprise and economic development, in line with the policies and objectives as set out in national, regional and local strategies."

Policy ECON P6 (Enterprise and Employment Development Opportunities) states:

"It is a policy of the Council to promote and facilitate opportunities for sectoral development in Limerick, to increase productivity, create employment and to diversify the economy and ensure future economic resilience."

Objective ECON O35 (Rural Development): *"It is an objective of the Council to:*

a) *Facilitate the development of acceptable rural enterprises and to minimise pollution from agricultural and industrial sources by means of development management and water pollution legislation.*

b) *Encourage the redevelopment of vacant commercial units for enterprise and industry creation including Kantoher Business Park, Castlemahon and other identifiable rural commercial brownfield sites, subject to normal planning and environmental criteria.*

c) *Promote the development of our rural Towns and Villages as an important focus of restaurant, leisure and evening uses - subject to the safeguarding of surrounding residential amenity and environmental criteria."*

This proposal has had regard to CDP Objective '**ECON O36**' which relates to agricultural developments:

"It is an objective of the Council to favourably consider proposals for agricultural development where:

a) *They are appropriate in nature and 151 Chapter 5: A Strong Economy scale to the area in which they are located;*

b) *The proposal is necessary for the efficient use of the agricultural holding or enterprise;*

c) *The development is not visually intrusive in the local landscape and, where the proposal is for a new building(s) and there are no suitable redundant buildings, the proposal is sited adjacent to existing buildings;*

d) *The proposal demonstrates that it has taken into account traffic, environmental and amenity considerations and is in accordance with the policies, requirements and guidance contained in this Plan."*

This proposal has had regard to CDP Objective **ECON O37 (Farm Diversification),** which states, *"It is an objective of the Council to favourably consider proposals for farm diversification in the open countryside where the proposal:*

a) *Would not negatively affect public health or agricultural operation on neighbouring farms;*

b) *Is of a size and scale which is sympathetic to and which does not negatively impact on the character and amenity of the surrounding area; and*

c) *Demonstrates that it has taken into account traffic, environmental and amenity considerations and is in accordance with the policies, requirements and guidance contained in this Plan. All development in the countryside will be required to respect the appearance and character of the rural landscape."*

Objective **ECON O44 (Circular Economy)** states, *"It is an objective of the Council to support the economic benefits and opportunities that exist in the transition to a more circular economy."*

The Proposed Development will assist in the delivery of the above objectives of the CDP. The proposal will generate renewable energy from organic waste, enhance security of energy supply, and will generate a notable element of employment in support of the local and rural economy. The proposal will support the diversification of the agriculture industry on a site located in the open countryside.

4.6.1.5 Chapter 6: Environment, Heritage, Landscape and Green Infrastructure

This proposal takes note of CDP Objective **EH O5 (New Infrastructure Projects)** which states, *"It is an objective of the Council to require new infrastructure and linear developments in particular, to demonstrate at design stage sufficient measures to assist in the conservation of and dispersal of species and to demonstrate a high degree of permeability for wildlife, to allow the movement of species and to prevent the creation of barriers to wildlife and aquatic life in the wider countryside."*

Objective EH O10 (Trees and Hedgerows) states, *"It is an objective of the Council to:*

a) *Retain and protect amenity and biodiversity value of the County and City by preserving as far as possible trees, woodlands and hedgerows, having regard to the significant role that trees and hedgerows play in local ecology, climate change and air quality and their contribution to quality place making and the associated health and wellbeing benefits.*

b) *Require, in the event that mature trees or extensive mature hedgerow is proposed to be removed, that a comprehensive tree and hedgerow survey be carried out by a suitably qualified tree specialist to assess the condition, ecological and amenity value of the tree stock/ hedgerow proposed for removal and to include mitigation planting and a management scheme. The Council will seek in all cases to ensure when undertaking*

development, or when permitting development, that the loss of, or damage to, existing trees is minimised.

c) *Require the planting of native trees, hedgerows and vegetation and the creation of new habitats in all new developments and public realm projects. The Council will avail of tree planting schemes administered by the Forest Service, in ecologically suitable locations, where this is considered desirable."*

4.6.1.6 Chapter 7: Sustainable Mobility and Transport

Objective TR O21 (c) relates to compressed natural gas vehicles, outlining that *"it is an objective of the Council to:*

- *Encourage the switch to Compressed Natural Gas (CNG) vehicles through the roll-out of additional CNG points at appropriate locations, throughout Limerick, in association with relevant agencies and stakeholders."*

We note the following CDP objective which relates to the R518 regional road in the vicinity of the Site:

Objective **TR O41 (Strategic Regional Roads):** *"It is an objective of the Council to:*

a) Improve, manage and maintain the strategic regional road network in Limerick, in a manner which safeguards the strategic function of the road network;

b) Prohibit development generating additional traffic and requiring direct access onto a strategic regional road in areas where speed limits in excess of 50km/h apply;

- *Consider permitting access onto a strategic regional road where members of the farming community wish to build houses for their own occupation, on their own land where the house is required for occupation by a member of the farming community in connection with the working of the farm and where no reasonable alternative access is available to them and where that access is safe and the traffic levels generated are reasonably low. Such developments shall be subject to a Road Safety Audit and all relevant planning criteria."*

The proposed access to the site is from a local road rather than a regional road.

4.6.1.7 Chapter 8: Infrastructure

Policy IN P1 (Strategic Infrastructure) states, *"It is a policy of the Council to:*

a) *Secure investment in the necessary infrastructure (including digital technology, ICT, telecommunications networks, water services, surface water management, waste management, energy networks), which will allow Limerick to grow and realise its full potential.*

b) *Fulfil Limerick's ambition as a contemporary City and County in which to live, work, invest and visit, with supporting infrastructure, whilst complying with the relevant EU Directives and national legislation, including the protection of the environment."*

We take note of the surface water and SuDS objectives outlined in **Objective IN O12**.

Objective IN O13 (Energy and Gas Networks) states, *"It is an objective of the Council to:*

a) ***Support the sustainable reinforcement and provision of new energy infrastructure*** *by infrastructure providers (subject to appropriate environmental assessment and the planning process),* ***ensuring the energy needs of future population and economic expansion across Limerick and the wider Southern Region can be delivered in a sustainable and timely manner****.* [**Emphasis added**].

b) *Protect existing infrastructure and strategic route corridors for energy networks from encroachment by development that might compromise the performance of the networks.*

c) *Require energy transmission infrastructure to comply with best practice with regard to siting, design and least environmental impact, in the interest of landscape protection.*

d) *Require that, in all new developments, multiple services are accommodated in shared strips underground and that access covers are shared, whenever possible. The location of services shall be subterranean, where appropriate. Where existing and proposed high voltage lines traverse new residential, commercial or civic developments, 251 Chapter 8: Infrastructure these should be relocated underground where technically feasible. The Council will require written consent to this relocation as part of the planning application process.*

e) ***Support the transition of the gas network to a carbon neutral network by 2050, thereby supporting Limerick to become carbon neutral****.* [**Emphasis added**].

f) *Support Community Energy Companies to create positive energy districts.*

g) *Ensure that in the delivery of energy infrastructure, the strategic function of the national road network is safeguarded in accordance with national policy by utilising available alternatives."*

Section 8.6 of the CDP states, *"As Ireland transitions to a low carbon society, significant investment and research is being directed towards innovative renewable energy sources, such as bio-energies generated through anaerobic digestion, solar power and the potential of tidal energy and wind energy."*

Objective IN O16 (Gas Development) states:

"It is an objective of the Council to support GNI's Network Development Plan 2018 – Assessing Future Demand and Supply Position to serve the future needs of Limerick. This ***includes the delivery, integration and connection of renewable energy proposals to the grid*** *in a sustainable and timely manner, subject to appropriate environmental assessment and the planning process."* [**Emphasis added**].

Section 8.6.3 of the CDP states:

"In working towards securing a low carbon economy and meeting carbon emission targets, GNI are ***progressing ideas around the development of renewable gas injection infrastructure and Compressed Natural Gas Infrastructure****,* ***which could be used in the*** *transport and* ***agricultural sectors in particular****."* [**Emphasis added**].

Objective IN O17 (Waste Management and the Circular Economy) states, *"It is an objective of the Council to:*

a) ***Support innovative, smart solutions and processes, based on the principles of the circular economy*** *to implement the Regional Waste Management Plan for the Southern Region 2015 – 2021 and any subsequent plan, including any targets contained therein.*

b) *Collaborate with the Regional Waste Management Office and other agencies to implement the EU Action Plan for the Circular Economy – Closing the Loop, 2015, its successor the Circular Economy Action Plan: A New Circular Economy Action Plan for a Cleaner More Competitive Europe, 2020 and the Resource Opportunity-Waste Management Policy, DECLG, 2012 and any subsequent plans.*

c) *Promote sustainable patterns of consumption and production in the areas of product design, production processes and waste management.*

d) *Implement the provisions of the Waste Action Plan for a Circular Economy – Ireland's National Waste Policy 2020 - 2025, DECC, 2020 in the assessment of planning applications.*

- *Protect existing civic amenity sites and bring sites throughout Limerick and support the development of additional sites in accordance with the Southern Regional Waste Management Plan 2015 – 2021 and any subsequent plans.* [**Emphasis added**].

We take note of **Objective IN O20 (Agricultural Waste)** of the CDP: *"It is an objective of the Council to:*

a) *Encourage the development of new alternatives and technological advances in relation to waste management on the farm and waste infrastructure such as Organic Waste to Energy/Combined Heat and Power schemes, subject to compliance with normal planning and environmental criteria.*

- *Require that the disposal of agricultural waste is carried out in a safe, efficient and sustainable manner, having regard to protection of the environment and public health and in compliance with the Nitrates Directive, Good Agricultural Practice for the Protection of Waters) Regulations 2017 (SI 605 of 2017), the Habitats Directives and any other relevant statutory provisions."*

In accordance with the above objectives, the development represents an opportunity to sustainably utilise agricultural waste for the delivery of renewable energy and high-quality biobased fertiliser which will help to displace fossil fuel-based chemical fertilisers.

4.6.1.8 Chapter 9: Climate Action, Flood Risk and Transition to Low Carbon Economy

Policy CAF P1 (Climate Action Policy) states, *"It is a policy of the Council to implement international and national objectives, to support Limerick's transition to a low carbon economy and support the climate action policies included in the Plan".*

Objective CAF O1 (Compliance with Higher Tier Climate Legislation and Guidance): *"It is an objective of the Council to:*

a) *Support the National Adaptation Framework 2018 and the National Climate Change Strategy, including the transition to a low carbon future, taking account of flood risk, the promotion of sustainable transport, soil conservation, the importance of green infrastructure, improved air quality, the use of renewable resources and the re-use of existing resources.*

b) *Support the implementation of the Limerick Climate Change Adaptation Strategy (2019) while cognisance shall be had of any revised or forthcoming adaptation, mitigation or climate action strategies or plans at local, regional and national level in the formulation of any plans or policies."*

This proposal has regard to the following policies and objectives of the CDP:

- **CAF O8 (Renewable Energy Objective):** *"It is an objective of the Council to promote and support development of renewable energy sources, which will achieve low carbon outputs including on-land and offshore renewable energy production, which support tidal turbine, PV, community energy companies and battery technology, subject to adequate environmental and ecological protection."*

- **Objective CAF O9 (Achieving Climate Resilience):** *"It is an objective of the Council to promote climate resilience in development and economic activities that are regulated by planning. It is important to ensure that any developments are climate resilient as they will need to function in a climate altered environment. This means that they will be able to withstand increased intensity of storm events and rainfall and through adequate design, location and drainage elements, would not contribute to problems elsewhere, such as increased run off."*

- **Policy CAF P2 (Transition to a Low Carbon Economy**): *"It is a policy of the Council to support the transition to a low carbon climate resilient economy, by way of reducing greenhouse gases, increasing renewable energy and improving energy efficiency and will future proof policies and objectives to deliver on this approach, in so far as possible."*

- **Objective CAF O14 (Energy Generation):** *"It is an objective of the Council to support the local production of renewable energy and connection to the gas network. Where electricity is being generated locally, the Council will support the provision of infrastructure for its transmission to the grid, subject to it fulfilling technical and environmental requirements."*

- **Objective CAF O16 (Circular Economy):** *"It is an objective of the Council to encourage the adoption of the circular economy through promotion of the reuse, recycling and reduction of the use of raw materials and resources."*

- **Policy CAF P6 (Renewable Energy):** *"It is a policy of the Council to support renewable energy commitments outlined in national and regional policy, by facilitating the development and exploitation of a range of renewable energy sources at suitable locations throughout Limerick, where such development does not have a negative impact on the surrounding environment landscape, biodiversity, water quality or local amenities, to ensure the long-term sustainable growth of Limerick."*

- **Policy CAF P9 (Renewable Energy Technologies):** *"It is a policy of the Council to consider all emerging renewable energy technologies, such as hydrogen electrolysis, pumped storage and small-scale anaerobic digestion and any other source of renewable energy technologies that are viable as a means of energy security, subject to the relevant level of necessary environmental and ecological assessments."*

We take note of the following CDP objectives which promote the production of biogas:

- Objective **CAF O26 (Bio Energy):** *"It is an objective of the Council to support the development of **bio energy** and projects in suitable locations and subject to adequate assessment. The development of grid injection, where this is necessary for renewable energy input will also be supported."* [**Emphasis added**].

- **Objective CAF O27 (Renewable Energy Production):** *"It is an objective of the Council to encourage and facilitate the production of energy from renewable sources, such as from **bioenergy**, solar, hydro, tidal, geothermal and wind energy, subject to appropriate levels of environmental assessment and planning considerations."* [**Emphasis added**].

- **Objective CAF O38 (Emerging Technologies):** *"It is an objective of the Council to facilitate and encourage future renewable energy technologies, such as hydrogen electrolysis, pumped storage and small-scale **anaerobic digestion** and any other source of renewable energy technologies, that are viable as a means of energy security, subject to compliance with all relevant planning criteria."* [**Emphasis added**].

Section 9.4.1 states, *"Technologies such as anaerobic digestion (AD) and dry digestion can play a role in helping to manage sources of farm waste in particular and can help to provide an outlet for farm waste, municipal solid waste, or by products from the food industry.*

The section further emphasises that *"This technology would be particularly appropriate for the treatment of farm wastes".*

Objective CAF O40 (Energy Storage) states, *"It is an objective of the Council to promote the use of efficient energy storage systems and infrastructure that regulates energy supply and helps even out the variable nature of some renewable energy supply sources."*

The Proposed Development supports the CDP policies and objectives pertaining to the climate change and the transition to a low carbon society. The proposal will utilise agricultural wastes to produce renewable energy in the form of biogas, supporting the circular economy and the realisation of a low carbon society.

4.6.1.9 Chapter 11: Development Management Standards

Section 11.7.2.3 of the CDP provides development management standards pertaining to 'Biogas/Bio-energy/Bio-mass and Innovative Energies'. This section states, *"Aligned with national policy, **the Council acknowledges the robust contribution innovative energy solutions make to Ireland's transition to a low carbon society**. **Innovative energy systems provide opportunities for rural diversification using indigenous renewable resources such as** biomass, energy crops, forestry material, **biogas** and farm slurry. Other alternative energy generation projects include hydro-schemes, wave and tidal power, harnessing landfill gas and sewage sludge. **These contemporary energy projects have a role in securing Ireland's future energy supply and create opportunities to export power**."* [**Emphasis added**].

This section lists the general requirements of planning applications for such developments:

- *"Planning history of the site;*
- *Planning justification and assessment of the project outlining how the project is implementing current national, regional and local policy in relation to sustainable energy;*
- *Waste management and disposal, Waste Disposal and Asbestos Assessment if refurbishing existing structures;*
- *Technical specifications of all structures on site including plant buildings, storage facilities, processing structures such as tanks, generators, control buildings, flare stacks, substations, staff facilities, parking provision etc.;*
- *Natural heritage, environmental reports (EIAR and AA), ground conditions, impact on ground waters and surface waters, drainage and flood risk;*
- *Landscape Character Area as designated under this Plan;*
- *Ground conditions, hydrology, geology, hydrogeology, impact on ground water and surface waters;*
- *Implication for traffic including safety, trip generation and movement during construction and at operational stage, transport of the flammable material, impact on road network;*
- *Water services availability;*
- *Connection to the National Grid;*
- *The developer will be requested to submit as part of the planning application a Noise Assessment in accordance with BS 4142:2014+A1:2019 Methods for Rating and Assessing Industrial and Commercial Sound, establishing potential adverse effects at noise sensitive receptors and any necessary noise mitigation measures. The assessment should be prepared by a suitably qualified professional with sufficient expertise;*
- *Mitigation measures for odour and dust nuisance for public health;*
- *Visual impact;*
- *Source and volume of raw material, processing methods including a Nutrient Management Plan if relevant. Details of the destination of final product and method of transport;*
- *Landscaping, security and fencing."*

4.6.1.10 Statement of Consistency with the Limerick Development Plan

The Proposed Development of an anaerobic digestion facility to produce biomethane is highly promoted by the CDP, to achieve renewable energy targets. The Site is located in proximity to the source material and point of demand.

The CDP recognises its role in progressing towards a sustainable energy future for County Limerick, by promoting a low carbon society and mitigating impacts of climate change. It highlights the need to address the causes of climate change in line with the NDP, by reducing greenhouse gas emissions in the agricultural and energy sectors. Biofuels are highlighted as a potential and feasible renewable energy option for the County.

The Site is located on a greenfield site, within a rural location surrounded by agricultural lands, in close proximity to feedstock material. According to the EIAR submitted within this application, there will be no adverse residual impact on the surrounding land, air, water, or properties.

The Proposed Development is an agricultural related development as it will use agricultural wastes from farms in the surrounding area, to produce renewable biomethane and a high quality biobased fertiliser.

The location of the Site is considered to be appropriate due to its strategic nature, strategic location, proximity from source material and point of demand, good transportation connectivity, appropriate size with a low environmental impact and location outside of flood any risk zones.

The EIAR submitted with the application includes a detailed Landscape and Visual Impact Assessment, informed by a series of photomontages, which demonstrate the effectiveness of layout and landscaping measures in ensuring that the proposed development will integrate effectively into its surrounding landscape.

The Proposed Development is consistent with the best practice and planning principles in the CDP, including the prevention of negative impacts on the surrounding environment, landscape, biodiversity or local amenities.

The CDP aims to minimise waste using the Circular Economy concept. The Proposed Development will use organic material to produce renewable biomethane and sustainable biobased fertiliser.

The proposal seeks to utilise the waste agricultural resources of the local area in an environmentally sustainable and beneficial manner, consistent with Limerick City and County Council's support for the development of the circular economy and bioeconomy.

AD is recognised as a potential and feasible option for the production of renewable energy in County Limerick, and as a means for the agricultural and energy sectors to move towards environmentally and economically sustainable models. Innovative developments such as this also recognise the importance of social sustainability, with community buy-in and local partnerships supported at the County level as a means by which communities are empowered to take control of the production and consumption of energy.

The Proposed Development of the anaerobic digestion facility in the proposed location at Cappanihane is coherent with the aims of the CDP.

The Proposed Development will directly contribute to the achievement of ambitious targets for the biomethane sector set out within the 2024 Climate Action Plan and the Government Biomethane Strategy. The EIAR submitted with the application demonstrates that the Proposed Development will not give rise to any significant impact on the environment, including in relation to water quality, landscape, biodiversity, or amenities. This proposal will also deliver local employment and support the local rural economy.

4.6.2 Limerick City and County Council – Local Authority Climate Action Plan 2024-2029

The 'Strategic Vision' of the Limerick City and County Council Climate Action Plan, formally known as the 'Local Authority Climate Action Plan 2024-2029'[40] ('LACAP' hereafter) is outlined as follows:

"Limerick – A Green City Region on the Waterfront By 2030, Limerick will become a green City region on the Shannon Estuary connected through people and places. This will be achieved through engagement, innovation, resilient urban development and self-sustaining rural

[40] LC&CC (2024) *LACAP*: https://www.limerick.ie/sites/default/files/media/documents/2024-04/local-authority-climate-action-plan-2024-2029.pdf

communities."

The following 'Key Ambitions' underpin this vision for the LACAP:

- *"**A Green Region**: Limerick will develop as an environmentally sustainable and carbon neutral economy - a pioneer in sustainable growth. This will be underpinned by the promotion of active mobility for all, creating an attractive and distinctive place to live, work and visit."*

- ***"Embracing the River Shannon**: Limerick will provide room for people to enjoy the River Shannon/ Estuary. The animation of the waterfront will increase public access and create new recreational opportunities for residents and visitors."*

- ***"Resilient, Connected and Inclusive Communities**: The future development of Limerick will make it easier to live sustainably and be well prepared for the future, increasing opportunities for movement and connectivity between communities."*

- ***"A Sustainable, Innovative and Competitive Economy**: The Limerick region will be an inclusive, self-sustaining economy built on growth and innovation and which maximises its competitive edge. This will enhance local enterprises; attract international investment in a manner, which guarantees quality of life."*

Building on this, according to the LACAP, the vision for the LACAP is as follows:

"Limerick City and County Council will lead the transition to a low carbon and climate resilient society. This will be achieved through engagement, innovation and a just transition."

The following is the 'Mission' of the LACAP:

"We will strive to achieve this by focusing on the key sustainability pillars of energy, transport, waste, behavioural change, land use, ecosystems and the built and natural environments. We will achieve this by supporting innovation and co-creation with all stakeholder in a collaborative environment across the county."

The targets of the LACAP are as follows:

- 50% improvement in the Council's energy efficiency by 2030;
- 51% reduction in the Council's greenhouse gas emissions by 2030;
- To make Limerick a climate resilient county, by reducing the impacts of future climate change related events; and
- To actively engage and inform our communities on climate action.

Section 4.2.5.1 (Renewable Energy Sources) states, *"To **support an increase in renewable energy sources** across the county LCCC will prepare a Renewable Energy Strategy for the County **that will include**, wind, solar, integrated renewables as well as District Heating, Green Hydrogen, **Anaerobic Digestion**, including Bio Compressed Natural Gas."* [**Emphasis added**].

Section 4.6 (Circular Economy and Resource Management) states, *"At a national level, the Waste Action Plan for a Circular Economy 2020–2025 set the scene for our transition from waste disposal to preserving resources in a circular economy. Policy is further strengthened by Ireland's first national circular economy strategy, the 'Whole of Government Circular Economy Strategy 2020-2023', and the 'National Waste Management Plan for a Circular Economy 2024-*

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*2030'. Regard will also be had to "**Ireland's Draft National Biomethane Strategy Jan 2024**."*

Statement of Consistency with the Local Authority Climate Action Plan

The Proposed Development will support the LACAP vision of transitioning to a low carbon society. This proposal will support an increase in renewable energy sources across the County. The LACAP references anaerobic digestion specifically, as a source to be promoted for the increased production in renewable energy.

4.7 Summary Statement

This chapter examined and summarised the relevant planning, climate, and waste management policy, and the legislative context at European, and national levels with relevance to the Proposed Development located within the townland of Cappanihane, Co. Limerick.

The Proposed Development aims to lessen the dependence on imported fossil fuels, provide greater security in energy supply, and increase the provision of renewable energy in line with government and planning policy at the national, regional, and local level.

It is considered that the Proposed Development is supported by the Limerick Development Plan 2022-2028 and the local, regional and national policy discussed within this chapter.

The Proposed Development has been carefully designed so it will integrate into the local landscape, will not be prejudicial to public health, and would be acceptable in terms of traffic safety. The Proposed Development would therefore be in accordance with the proper planning and sustainable development of the area and will deliver local renewable energy generation and employment to support the economic development and prosperity of the area.

This EIAR is accompanied by a detailed Planning Report, produced by John Spain Associates.

The Planning Report is intended to supplement this chapter of the EIAR with a more extensive and detailed assessment of the consistency of the Proposed Development with the relevant national, regional, and local planning policy context. We refer the Planning Authority to the accompanying Planning Report prepared by John Spain Associates for further details.