Planning and Environmental Consultants

Environmental Impact Assessment Report (EIAR)

Seskin Renewables Wind Farm

Chapter 2 – Background to the Proposed Development

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2. BACKGROUND AND POLICY

2.1 Introduction

This Chapter of the EIAR presents the policies and targets which have been put in place at the various levels of Government, both national and international in relation to renewable energy and climate change. The details below set out the need for the Proposed Development to aid Ireland in meeting its national targets and European commitments in relation to climate change and decarbonisation. It also summarises EIA scoping and consultation undertaken and the cumulative impact assessment process.

The overall Proposed Development comprises the construction of 8 no. turbines (6 no. turbines located in County Kilkenny and 2 no. turbines located in County Laois), an on-site 38kV electricity substation, underground electrical cabling for grid connection, a permanent meteorological mast, underground electricity cabling to the existing Ballyragget 110kV substation in County Kilkenny and all associated works. As set out in Chapter 1 of the EIAR a single EIAR has been prepared to accompany the planning applications for the Proposed Development.

The Proposed Development comprises the provision of a wind farm which will generate electricity for export onto the national grid. The need to decarbonise and reduce emissions has always been imperative, however, in recent years the urgency involved has become clearer to all stakeholders. The Climate Action Plan (CAP) first published by the Government in 2019, and updated in 2021, 2023, 2024 and 2025 sets out a roadmap to halve emissions by 2030 and reach net zero no later than 2050. Central to this is the set of measures set out to increase the proportion of renewable electricity to up to 80% by 2030 and a target of 9GW from onshore wind. The CAP places front and centre the facts that without urgent action, global warming is likely to be more than 2°C above pre-industrial levels by 2060, with '*devastating*' impacts on nature and '*irreversible changes to many ecosystems*' arising.

Furthermore, the Programme for Government released in January 2025 "*The Government is committed to achieving 80% of Ireland's electricity generation from renewable sources by 2030. To reach this goal, we will establish a clear regulatory pathway, enable network upgrades, improve port facilities, and ensure a dependable schedule of renewable energy auctions. We are focused on ensuring that local communities benefit from Ireland's renewable potential, with job creation, community ownership, and tangible economic returns.*"

The primary driver behind the Proposed Development is the need to provide additional renewable energy to offset the use of fossil fuels within the electricity generating sector. Increasing electricity generation from wind power represents the most economical renewable option to reduce emissions within the power generation sector and is the most mature technology available to achieve national targets that have been established for decarbonisation. The current proposal represents the provision of a significant wind energy proposal and will contribute considerably towards Ireland satisfying its 2030 and 2050 renewable energy targets.

2.1.1 Renewable Energy Resources

Renewable energy resources are constantly replenished through the cycles of nature, unlike fossil fuels, which are finite resources that are becoming increasingly scarce and expensive to extract. Renewable energy resources offer sustainable alternatives to our dependency on fossil fuels as well as a means of reducing greenhouse gas emissions and opportunities to reduce our reliance on imported fuels. These resources are abundantly available in Ireland, yet only a fraction has been tapped so far[1].

[1] *Source: Sustainable Energy Authority of Ireland (SEAI) website, www.seai.ie*

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

2.2 Climate Change Policy and Targets

International and national policy consistently identifies the need to reduce greenhouse gas (GHG) emissions and stresses the importance of reducing global warming. The context of international policy has altered over the last 30-years from being of a warning nature to the current, almost universally accepted belief, that there is a climate change emergency occurring both within Ireland and at a broader global scale. The Intergovernmental Panel on Climate Change (IPCC)'s Sixth Assessment Report[2] published in 2021 provides a stark assessment of global climate change and presents evidence that climate changes will increase in all regions of the globe over the coming decades and that much of the damage caused by climate change up to this point is now likely irreversible, such as the rise in sea levels over the 21st century. The Synthesis Report[3] of the IPCC Sixth Assessment Report published in March 2023 summarises the state of knowledge of climate change, its widespread impacts and risks. The Synthesis Report states that *'continued global warming is projected to further intensify the global water cycle, including its variability, global monsoon precipitation, and very wet and very dry weather and climate events and seasons'*.

The IPCC's projections are evident in extreme climate events occurring across the world. According to the World Meteorological Organisation's State of the Global Climate Report published in November 2024 report[4]:

- Greenhouse gases reached record observed levels in 2023. Real time data indicate that they continued to rise in 2024.
- January – September 2024 global mean surface air temperature was 1.54± 0.12 °C above the pre-industrial 1850–1900 average. Boosted by El Niño, 2024 is on track to be the warmest year on record. Long term warming, measured over decades, still remains below 1.5°C.
- Ocean heat content and sea level continue to rise. In 2023, the ocean absorbed around 3.1 million TWh of heat, equal to approximately 15 times the world's total energy consumption.

According to the World Meteorological Organisation's State of the Global Climate Report published in March 2023[5]:

- In 2023, global mean sea level reached a record high in the satellite record (since 1993), reflecting continued ocean warming (thermal expansion) as well as the melting of glaciers and ice sheets.

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[2] *Source: Sustainable Energy Authority of Ireland (SEAI) website, www.seai.ie*
[2] *Climate Change 2021 'The Physical Science Basis' (Intergovernmental Panel on Climate Change, August 2021)*
[2] *Climate Status Report for Ireland 2020 (Environmental Protection Agency, Marine Institute, Met Éireann, August 2021)*
[3] *Climate Change 2023 Synthesis Report (IPPC)*
https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_FullVolume.pdf
[4] *State of the Global Climate 2024, Update for COP29 (World Meteorological Organisation, November 2024)*
https://library.wmo.int/records/item/69075-state-of-the-climate-2024
[5] *State of the Global Climate 2023 (World Meteorological Organisation, March 2024)* https://library.wmo.int/records/item/68835-state-of-the-global-climate-2024

- Antarctic sea-ice extent reached an absolute record low for the satellite era (since 1979) in February 2023 and remained at record low for the time of year from June till early November. The annual maximum in September was 16.96 million km², roughly 1.5 million km² below the 1991–2020 average and 1 million km² below the previous record low maximum.
- Combining the two main ice sheets (Greenland and Antarctic), the seven highest melt years on record are all since 2010, and average rates of mass loss increased from 105 Gigatonnes per year from 1992–1996 to 372 Gigatonnes per year from 2016–2020. This is equivalent to about 1 mm per year of global sea level rise attributed to the ice sheets in the latter period.

Extreme weather and climate events are having major impacts on all continents, also documented in the World Meteorological Organisation's State of the Global Climate Report:

- Flooding associated with extreme rainfall from Mediterranean Cyclone Daniel affected Greece, Bulgaria, Türkiye, and Libya with particularly heavy loss of life in Libya in September 2023.
- Tropical Cyclone Freddy in February and March 2023 was one of the world's longest-lived tropical cyclones with major impacts on Madagascar, Mozambique and Malawi. Tropical Cyclone Mocha, in May, was one of the most intense cyclones ever observed in the Bay of Bengal.
- Extreme heat affected many parts of the world. Some of the most significant were in southern Europe and North Africa, especially in the second half of July 2023 where severe and exceptionally persistent heat occurred. Temperatures in Italy reached 48.2°C, and record-high temperatures were reported in Tunis (Tunisia) 49.0°C, Agadir (Morocco) 50.4°C and Algiers (Algeria) 49.2°C.
- Canada's wildfire season was more extension than any previously recorded. The total area burned nationally as of 15 October was 18.5 million hectares, more than six times the 10-year average (2013–2022). The fires also led to severe smoke pollution, particularly in the heavily populated areas of eastern Canada and the north-eastern United States.

The IPCC's Sixth Assessment Report does not, however, conclude that a climate catastrophe is inevitable, but rather, there remains a 'narrow path' to determine the future course of climate, mainly by cutting emissions down to net zero.

The Proposed Development will contribute considerably to the decarbonisation of the energy sector and reduce harmful emissions. In this regard, it is in compliance with national and international climate change policy and targets.

2.2.1 International Climate Policy

United Nations Framework Convention on Climate Change

In 1992, countries joined an international treaty, the United Nations Framework Convention on Climate Change (UNFCCC), as a framework for international efforts to combat the challenge posed by climate change. The UNFCCC seeks to limit average global temperature increases and the resulting climate change. In addition, the UNFCCC seeks to cope with impacts that are already inevitable. It recognises that the climate system is a shared resource whose stability can be affected by industrial and other emissions of carbon dioxide and other greenhouse gases. The framework set no binding limits on greenhouse gas emissions for individual countries and contains no enforcement mechanisms. Instead, the framework outlines how specific international treaties (called "protocols" or "Agreements") may be negotiated to set binding limits on greenhouse gases.

Kyoto Protocol

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

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

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

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

COP21 Paris Agreement

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

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

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

COP25 Madrid

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

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

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

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

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

COP26 Glasgow

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

The key items COP26 seeks to achieve are:

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

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

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

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

COP27 Egypt

COP27 took place in Sharm el-Sheikh from the 6th of November to the 20th of November 2022. The Conference of the Parties (COP) is a supreme decision-making body of the United Nations Framework Convention on Climate Change (UNFCCC). COP 27 centred around three major topics:

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

The most significant outcomes from COP 27 are outlined below:

- **Phase down/out language**: The final agreement contains a commitment to a 'phase down' of coal use, as opposed to a wider commitment to phase out all fossil fuels;
- **1.5°C Pathway:** The 1.5°C warming limit has been retained, and reassurances have been made that there is no room for backsliding;
- **Climate Finance & Loss and Damage**: There has been the launch of an initiative by the V20 and G7 known as the Global Shield Against Climate Risk (GSACR). The intention of this initiative has been framed almost as an insurance policy backed by the World Bank to prepare and protect those most vulnerable to climate change disasters.

COP 28 – United Arab Emirates

The 28th session of the COP to the UN Framework Convention on Climate Change, was held in Dubai from 30 November to 13 December 2023. The main objective of COP was to assess the progress made by all parties on the implementation of the 2015 Paris Agreement through the concluding phase of the 'global stocktake', which began after COP26 in 2021.

A key outcome from COP 28 was the agreement to phase out fossil fuels and increase renewable energy capacity. The agreement calls for a tripling of renewable energy capacity globally by 2030. This was the first time that the COP explicitly addressed the need to end the use of fossil fuels. The agreement was signed by the Irish government among 116 other nations. The acceleration of the

permitting of renewable projects and related infrastructure is identified as a crucial enabler to achieve the renewable energy targets set out under the agreement.

COP29 – Azerbaijan

The 29th COP of the UNFCCC (COP29) was held in Baku, Azerbaijan, from November 11th 2024 to November 22nd 2024.

COP29 focused on accelerating global efforts to address climate change, in particular global efforts related to climate finance. The New Collective Quantified Goal on Climate Finance (NCQG) was agreed in the final days of COP; while developing countries advocated for at least USD 1 trillion annually by 2035, developed nations agreed to triples finance to developing countries, with commitments increasing from USD 100 billion annually to USD 300 billion annually by 2035. The NCQG has already drawn criticism for being inadequate given the global financial need of developing nations to mitigate and adapt to climate change effects and due to its lack of strong terminology in relation to the requirements of developed nations and detailed implementation strategies.

At COP29, significant progress was made in the discussions surrounding carbon markets, with nearly 200 nations agreeing on critical rules under Article 6 of the Paris Agreement. These rules aim to establish an UN-backed international carbon market. The adoption of these rules is seen as a crucial step towards operationalising a robust and credible carbon market. Despite the advances, concerns were expressed about the potential for weak governance and risks of exploitation in the system; these issues must be addressed to ensure the market's full functionality.

European Green Deal – European Climate Law (2021)

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

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

The European Climate Law[6] writes into law the objectives set out above in the European Green Deal for Europe's economy and society to become climate-neutral by 2050. Climate neutrality by 2050 means achieving net zero greenhouse gas emissions for EU countries as a whole, mainly by cutting emissions, investing in green technologies and protecting the natural environment. The Climate Law includes:

[6] *Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ('European Climate Law') published in the Official Journal on 9 July 2021 and came into force on 29 July 2021.*

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

The law aims to ensure that all EU policies contribute to this goal and that all sectors of the economy and society play their part. All 27 no. EU Member States have committed to turning the EU into the first climate neutral continent by 2050. One third of the 1.8 trillion-euro investments from the NextGenerationEU Recovery Plan, and the EU's seven-year budget, will finance the European Green Deal. On 14th July 2021, the European Commission adopted a set of proposals[7] to make the EU's climate, energy, transport and taxation policies fit for reducing net greenhouse gas emissions by at least 55% by 2030, compared to 1990 levels.

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

2.2.2 Project Compliance with International Climate Policy

From the review of the relevant policy documents, it is considered that the Proposed Development will aid in reducing reliance on fossil fuels for electricity generation. This will help to achieve the United Nations Framework Convention on Climate Change goals of limiting global temperatures as a result of climate change and the goals of the Kyoto Protocol and the several Conference of Parties agreements as outlined above.

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

2.2.3 National Climate Policy

Programme for Government (2025)

The Programme for Government 2025 (January 2025) places specific emphasis on climate change, stating The Government's approach will ensure continued climate progress while growing the economy. The programme states that the government are committed to delivering actions to achieve a reduction in greenhouse gas emissions by 51% from 2018-2030 and net-zero no later than 2050. The programme commits to publishing an annual Climate Action Plan, placing a focus on a smaller number of strategic and impactful actions across all sectors, and publish a quarterly progress report.

[7] *'Fit for 55': delivering the EU's 2030 Climate Target on the way to climate neutrality (July 2021)*

With regard to energy generation, the Programme notes that the government is committed to achieving 80% of Ireland's electricity generation from renewable sources by 2030 and states that the Government will "*develop a comprehensive plan to accelerate energy generation, connectivity, and planning processes".*

The Climate Action and Low Carbon Development Act 2015 (as amended)

The Climate Action and Low Carbon Development 2015 (as amended) ('the Climate Act') legally binds Ireland to achieve net-zero emissions no later than 2050, **and to a 51% reduction in emissions by the end of this decade.**

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

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

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

A recent judgement of the High court delivered on 10th January 2025, provides clarity on the obligations imposed on public bodies under section 15 of the Climate Act (*Coolglass Wind Farm Limited v An Bord Pleanála [2025] IEHC 1*). While the Supreme Court has since granted An Coimisiún Pleanála (the Commission) leave to appeal the decision (on 20 May 2025), the High Court's reasoning currently stands and offers significant insight into how section 15 should be applied in practice.

The Court confirmed that there was a need for an imperative reading of Section 15(1) *"that the Board and any other relevant body is required to act in conformity with the climate plans and objectives set out in the subsection unless it is impracticable to do so".* The Court set out the following guide as to how a planning authority should apply Section 15(1) when making a decision:

1. Consider if the application, if granted, would contribute to achieving climate targets? In the case of renewable energy projects, the answer is invariably yes.
2. Consider whether granting permission is *"precluded by a mandatory and non-fixable legal requirement"* that does not give the decision maker any flexibility in reaching an outcome favouring climate goals, i.e. a grant of permission.
3. If the decision maker is not precluded from granting permission, then how can the planning authority use its evaluative judgement and discretion to reach an outcome favouring policy goals, including by:

a. Reaching a judgement as to the proper planning and sustainable development of a project in an evaluative way that furthers climate goals if practicable, albeit with an independent judgement that a project did not comply with the principles of proper planning and sustainable development, if those two concepts are properly considered together;

b. Where the need for material contravention arises, exercise the power to permit such contravention in whatever way further climate goals;

c. If non-mitigable impacts on European sites (e.g. SACs, SPAs) arise, apply the public interest override in a manner that furthers climate goals, if practicable to do so; and

d. If there is some impracticability in a grant of permission, but it can or could potentially be resolved by a procedural decisions that is not impracticable, make a procedural decision that is most consistent with climate goals to enable the problem to be fixed – for example to require further information if an applicant's initial assessment or application information is deemed inadequate.

In the Coolglass case, the Court found that the Commission had not engaged in a meaningful way with Section 15 of the 2015 Act. The Court referred to another decision of the Commission (dealt with in the Nagle View Turbine Aware Group v An Bord Pleanála [2024] IEHC 603 judgment) where the Board's Inspector found that climate goals take precedence over visual impacts and other such planning concerns. The Inspector in the Coolglass case had taken the view that the climate policies could not override the policy directives in the County Development Plan, and the Court disagreed with that approach and overturned the decision on this ground.

The Proposed Development aligns directly with national climate policy contributing to the 51% reduction in emissions being sought, which is, as outlined above, is a legally binding requirement. The Proposed Development is therefore consistent with and needed to achieve the binding emissions reduction targets at a national level.

Carbon Budgets

To achieve the 51% emissions reduction target, the Climate Act, requires the Climate Change Advisory Council (CCAC) to recommend a proposed programme of economy-wide 5-year Carbon Budgets to the Minister for the Environment, Climate and Communications. The first national carbon budget programme proposed by the Climate Change Advisory Council, approved by Government and adopted by both Houses of the Oireachtas in April 2022 comprises three successive 5-year carbon budgets[8]. The total emissions allowed under each budget are shown in Table 2-1 below.

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

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

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

Section 6C of the Climate Act provides that the Minister shall prepare, within the limits of the carbon budget, the Sectoral Emissions Ceilings. These ceilings set out the maximum amount of greenhouse gas emissions that are permitted in each sector. The Government approved Sectoral Emissions Ceilings on 28 July 2022. The electricity sector is allocated a sectoral ceiling of 40 Mt CO2 eq for the first budget (2021-2025) and a sectoral ceiling of 20 Mt CO2 eq for the second budget period (2026-2030). In 2022, the electricity sector emissions were 10.1 Mt CO2 eq.

Climate Action Plan 2023

The Climate Action Plan 2023 (CAP23) was published in December 2022 by the Department of the Environment, Climate and Communications. This outlines the actions required to 2035 and beyond to meet Ireland's commitment to becoming carbon neutral by 2050. CAP23 sets out a roadmap to deliver on Irelands climate ambition and is aligned to ensure that Ireland achieves its legally binding target under the Climate Act of net-zero greenhouse gas emissions no later than 2050. A target aims for a reduction in emissions of 51% over the period 2018 to 2030 and in doing so, prevent / mitigate the potentially devastating consequences of climate change on Ireland's environment, society, economic and natural resources.

The CAP23 states that to do so, Ireland must harness the untapped indigenous renewable resources and has a target of achieving 80% of energy being produced from renewable sources by 2030 (unchanged from the previous Climate Action Plan, 2022) with a target of 9GW of that being produced by onshore wind. Measures set out in CAP23 to achieve these targets include to 'accelerate and increase the deployment of renewable energy to replace fossil fuels' (Section 12.1.4 CAP23). It is clear from the message and ambition of CAP23 that the drive to deploy renewable energy projects such as the Proposed Development in Ireland are critical to achieving the aims and objectives of CAP23 including the 9GW of onshore wind energy by 2030 and carbon neutrality by 2050.

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

> *"Decarbonisation of the electricity sector is, as noted in CAP23, key to the decarbonisation of other sectors who will depend on electrification including transport, heating and industry. The increase in portion of renewable electricity of 80% by 2023 will come in part from a targeted 9GW of onshore wind. The plan notes: "Achieving further emissions reductions between now and 2030 requires a major step up in how we accelerate and increase the deployment of renewable energy to replace fossil fuels, deliver a flexible system to support renewables, and manage electricity demand".*

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

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

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

- Reduce annual CO2eq. emissions from the sector to 3 MtCO2eq by 2031 (75% reduction compared to 2018);
- Accelerate and increase the deployment of renewable energy to replace fossil fuels;
- Accelerate the delivery of onshore wind, offshore wind and solar through a competitive framework to reach 80% of electricity demand from renewable energy by 2030;
- Target 6GW of onshore wind and to 5 GW of solar by 2025;
- Target 9 GW onshore wind, 8 GW Solar and at least 5 GW of offshore wind by 2030;
- Align the relevant constituent elements of the planning and permitting system to support accelerated renewable energy development, supported by national policy and associated methodologies to inform regional and local planning policies, noting that Development Plans are obliged to set out objectives to facilitate energy infrastructure.

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

Climate Action Plan 2024

The Climate Action Plan 2024 ('CAP 24') builds on CAP 23 by refining and updating the status of the actions required to deliver the decarbonisation required under the carbon budgets and sectoral emissions ceilings. The renewable electricity generation targets are unchanged from the CAP 23 (9GW of onshore wind & 80% renewable electricity share).

CAP 24 includes the latest trends in the electricity sector:

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

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

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

The scale of the challenge is apparent when quantified:

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

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

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

Climate Action Plan 2025

The Climate Action Plan 2025 (CAP25) represents the third statutory update to Ireland's climate roadmap under the Climate Action and Low Carbon Development (Amendment) Act 2021. Building on the foundations laid by previous plans, CAP25 refines and strengthens the strategies necessary to deliver Ireland's legally binding carbon budgets and sectoral emissions ceilings. It sets out a clear trajectory to reduce greenhouse gas emissions by 51% by 2030 and to achieve climate neutrality no later than 2050.

A cornerstone of CAP25 is the decarbonisation of Ireland's electricity system through a substantial increase in renewable energy generation. The plan reaffirms ambitious targets for renewable electricity share which includes 80% by 2030, and 50% by 2025. This is to be achieved through the accelerated deployment of onshore wind (2 GW by 2025; 9 GW by 2030), offshore wind (8 GW by 2030), and solar energy (up to 5 GW by 2025; 8 GW by 2030).

2.2.4 Project Compliance with National Climate Policy

The proposed Seskin Renewables Wind Farm will generate renewable electricity which will supply to the national grid. The proposed renewable energy will help Ireland address the challenge of decarbonising electricity generation as well as addressing the country's over-dependence on imported fossil fuels. Therefore, it is considered that the Proposed Development is in compliance with climate policy. The Proposed Development will make a significant contribution to achieving the CAP 25 target of 9GW of onshore wind energy by the year 2030. Furthermore, the Proposed Development will aid Ireland in adhering to, or limiting the exceedance of, the country's carbon budgets.

2.3 Renewable Energy Policy and Targets

2.3.1 European Renewable Energy Policy

Renewable Energy Directive

The Renewable Energy Directive is the EU legal framework for the development of renewable energy across all sectors of the EU economy, supporting clean energy cooperation across EU countries. Since the introduction of the Renewable Energy Directive (RED) in 2009, it has undergone several revisions. Since its adoption in 2009, the share of renewable energy sources in energy consumption, across the EU, has increased from 12.5% in 2010 to 23% in 2022[9]. Of the 27 EU member states the lowest proportion of renewable energy in gross final energy consumption was recorded in Ireland (13.1%). Crucially, the Renewable Energy Directive sets the overall target for renewable energy in the EU.

RED I - 2009

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

[9] *https://ec.europa.eu/eurostat/en/web/products-eurostat-news/w/ddn-20231222-2*

RED II – 2018

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

RED III – 2023

In November 2023, a revision of the Renewable Energy Directive[10] (RED III), came into force. RED III increases the EU wide renewable energy target from 32% set under the previous revision of the directive to at 42.5%, with an ambition to reach 45% by 2030. The increase was proposed under the publication of REPowerEU plan in May 2022. The Directive also introduces specific targets for Member States in the industry, transport, and building (district heating and cooling) sectors.

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

There is an 18-month period to transpose most of the directive's provisions into national law, with a shorter deadline of July 2024 for some provisions related to permitting for renewables.

In September 2024, the European Commission opened infringement procedures against Ireland and 25 other member states by sending a letter of formal notice for failing to fully transpose the provisions of the revised Renewable Energy Directive relating to the simplification and acceleration of permitting procedures.

REPowerEU

The European Commission has proposed an outline of a plan to make Europe independent from Russian fossil fuels including oil and gas, due to the high and volatile energy prices, and security of supply concerns following Russia's unprecedented military attack on Ukraine. At the time of publication, the EU imported 90% of its gas consumption, with Russia providing around 45% of those inputs. Russia also accounted for around 25% of oil and 45% of coal imports. Phasing out dependence on fossil fuels can be done well before 2030, increasing the resilience of the EU-wide energy system based on two pillars:

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

With full implementation of the measures in REPowerEU plan, at least 155 billion cubic metres of fossil gas use could be removed, which is equivalent to the volume imported from Russia in 2021. Nearly two thirds of that reduction can be achieved within a year. A part of this plan includes *'Speeding up renewables permitting to minimise the time for roll-out of renewable projects and grid infrastructure improvements*.' This will make the sector more efficient and reach the set goals faster.

[10] *Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (recast)*

As such, it is submitted that the Proposed Development is strongly supported by EU energy policy. Many of the measures outlined in REPowerEU have been incorporated into national policy through the National **Energy Security Framework, which was published by the Government in April 2022.**

Regulation 2022/2577

In December 2022 a text of the proposal for a Council Regulation laying down a framework to accelerate the deployment of renewable energy was agreed by the European Council and published by the European Council[11]. The Regulation (Council Regulation (EU) 2022/2577) specifically seeks to accelerate the deployment of renewable energy sources, by means of targeted measures which are capable of accelerating the pace of deployment of renewables in the European Union in the short term. The regulation focuses therefore on measures which are implementable rapidly at the Member State level, namely the streamlining of the permit-granting processes applicable to renewable energy projects.

In that regard, the Regulation introduces the presumption that, as per Recital 8 of the regulation –

"One of the temporary measures consists of the introduction of a rebuttable presumption ***that renewable energy projects are of overriding public interest*** *and serving public health and safety for the purposes of the relevant Union environmental legislation, except where there is clear evidence that those projects have major adverse effects on the environment which cannot be mitigated or compensated for. Renewable energy plants, including heat pumps or wind energy, are crucial to fight climate change and pollution, reduce energy prices, decrease the Union's dependence on fossil fuels and ensure the Union's security of supply. Presuming renewable energy plants, including heat pumps, are of overriding public interest and serve public health and safety would allow such projects to benefit, where necessary, from a simplified assessment for specific derogations foreseen in the relevant Union environmental legislation with immediate effect."* (***Emphasis*** **added**)

While this Proposed Development is not seeking to utilise any derogations under European environmental legislation, the classification of renewable energy projects being '*in the overriding public interest'* highlights the strong support at a European Union wide level and the urgent need for developments such as the Project at a European wide level.

Wind energy in particular is identified as a significant future opportunity, as resources are stable and abundant, and public acceptance is higher. The plan states *"to further strengthen the EU wind sector's global competitiveness and achieve the REPowerEU ambition with fast wind energy deployment, supply chains need to be strengthened and permitting drastically accelerated.".*

The Proposed Development is directly supported through the REPowerEU framework. In this regard, the Proposed Development is clearly in the overriding public interest.

The regulation, which has immediate application in Member States, applies to "*all permit-granting processes that have a starting date within the period of its application*" and includes a number of tangible measures aimed at streamlining the permit-granting process and facilitating the accelerated deployment of renewable energy.

'A fast deployment of renewable energy sources can help to mitigate the effects of the current energy crisis, by forming a defence against Russia's actions. Renewable energy can significantly contribute to counter Russia's weaponisation of energy by strengthening the Union's security of supply, reducing volatility in the market and lowering energy prices.'[12]

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[11] *General Secretariat of the Council of the European Union, Outcome of Proceedings: Proposal for a COUNCIL REGULATION laying down a framework to accelerate the deployment of renewable energy (File no. 022/0367(NLE)) (22.12.2022)*
[12] *Council Regulation (EU) 2022/2577, at Recital 1*

Central to the regulation is the presumption that renewable energy development must be considered to be in the overriding public interest when addressing competing interests under the Habitats Directive (92/43/EEC), Birds Directive (2009/147/EEC) and the Water Framework Directive (2006/60/EC) and that renewable energy projects should be given priority when balancing legal interests in a given case – Article 3, part 2 states:

> 2) *'Member States shall ensure, at least for projects which are recognised as being of overriding public interest, that in the planning and permit-granting process, the construction and operation of plants and installations for the production of energy from renewable sources and the related grid infrastructure development are given priority when balancing legal interests in the individual case.... (emphasis added)'*

The initial period of application of the Regulation which has since been extended (see below) is the 30 December 2022 to 29 June 2024. However, the Regulation included provision for the EU Commission to review the application of, and continued need for, the measures included in the Regulation. By Regulation 2024/223 of the 22 December 2023 the Council of the European Union, Regulation 2022/2577 was extended and amended, with Article 3 applying to all permit-granting processes commenced up to the 30 June 2025.

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

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

Energy Roadmap 2050

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

- High Energy Efficiency;
- Diversified Supply Technologies;
- High Renewable Energy Sources;

- Nuclear energy; and
- Carbon capture and storage.

The analysis found that decarbonising the energy system is technically and economically feasible. The Roadmap notes that all scenarios show the biggest share of energy supply technologies in 2050 comes from renewables. In this regard, it should be noted that the Climate Change Advisory Council states within their 2022 Annual Review (August 2022) that to reach "*demanding emissions reductions targets required under our climate targets, wind and solar resources will need to be harnessed to a greater and faster extent than previously considered*". As such, a major prerequisite for a more sustainable and secure energy system is a higher share of renewable energy up to and beyond 2030 to 2050. Each of the scenarios assumes in the analysis that increasing the share of renewable energy and using energy more efficiently are crucial, irrespective of the particular energy mix chosen.

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

2.3.1.2 Project Compliance with European Renewable Energy Policy

The Proposed Development is considered to be fully in accordance with the above-mentioned EU Policy targets. The RePowerEU plan, aims at increasing the energy security within the EU and increasing the share of renewable energy onto the EU electricity grid. A part of this plan includes *'Speeding up renewables permitting to minimise the time for roll-out of renewable projects and grid infrastructure improvements'*. This will make the sector more efficient and reach the set goals faster. Therefore, it is considered that the Proposed Development is strongly supported by EU energy policy. Furthermore, Regulation 2022/2577 introduced significant measures to facilitate the acceleration of the deployment of renewable energy, including an obligation on member states to prioritise the roll of renewable energy projects when balancing competing legal interests. This Regulation applies to the present planning applications and EIA and further justifies the granting of consent for the Proposed Development.

2.3.2 National Renewable Energy Policy

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

On 12th May 2014, the Green Paper on Energy Policy in Ireland was launched which marked the start of a public consultation process on the future of Ireland's energy policy over the medium to long-term. The Department of Communications, Climate Action & Environment acknowledged that energy is an integral part of Ireland's economic and social landscape and that "*a secure, sustainable and competitive energy sector is central to Ireland's ability to attract and retain Foreign Direct Investment and sustain Irish enterprise. The three key pillars of energy policy are to focus on security, sustainability and competitiveness*"

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

The policy framework was developed to guide policy and actions that the Irish Government intends to take in the energy sector up to 2030 and also reaching out to 2050 to ensure a low carbon future that maintains Ireland's competitiveness and ensures a supply of affordable energy. The Energy Vision 2050, as established in the White Paper, describes a '*radical transformation*' of Ireland's energy system

which will result in GHG emissions from the energy sector reducing by between 80% and 95%, compared to 1990 levels. The paper advises that a range of policy measures will be employed to achieve this vision with emphasis on the generation of electricity from renewable sources, which there are plentiful indigenous supplies and increasing the use of electricity and bio energy to heat homes and fuel transport.

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

> *"Onshore wind continues to be the main contributor (18.2% of total generation and 81% of RES-E in 2014). It is a proven technology and Ireland's abundant wind resource means that a wind generator in Ireland generates more electricity than similar installations in other countries. This results in a lower cost of support."*

National Energy Security Framework

The National Energy Security Framework (NESF, April 2022) highlights clearly the impacts the Russian invasion of Ukraine and the resulting war has had on Europe's energy system. The resulting decision by the European Union to phase out the import of Russian gas, oil and coal (REPowerEU) has brought to the fore the importance of security of supply and how energy policy is designed for long-term resilience. It takes account of the need to decarbonise society and economy, to reduce Ireland's emissions by 51% over the decade to 2030 and reach net zero emissions by 2050. According to the SEAI's Energy in Ireland (2021) report, oil accounts for 45% of Ireland's primary energy requirement making it one of the highest rates of oil dependency in the EU. The International Energy Agency, of which Ireland is a member country, includes a 10-point plan to cut oil use which calls for an acceleration in the deployment of wind and solar projects. Ireland's response per the Framework is set out over three themes:

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

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

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

Energy Security in Ireland to 2030 – Energy Security Package

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

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

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

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

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

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

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

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

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

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

2.3.3 Project Compliance with the National Renewable Energy Policy

At a European level, there is a clear upward trend in the revisions of renewable energy targets. With a current target of 42.5%, with an ambition to reach 45% by 2030, it is crucial that

National Energy Policy aims to achieve two main gaols, 1) to decarbonise Ireland's national energy network, and 2) to increase Ireland's indigenous energy supply in order to improve the country's energy security. The National Energy Security Framework outlines several steps to accelerate Ireland's shift to renewable energy initiatives. It is evident that the Proposed Development aligns with this framework by increasing the proportion of renewable energy on the national grid, thus expediting Ireland's transition to a low-carbon energy future.

2.4 Climate and Renewable Energy Target Progress

At a European level, the latest data shows that, as of 2022, 23% of energy came from renewable energy sources[13]. This represents an increase of 1.1% compared to 2021 levels. While progress is being made to increase the share of renewable energy, it is clear that all EU member states need to intensify their efforts to collectively comply with the target of 42.5% for 2030 set in the latest revision of the renewable energy directive.

Of the 27 EU member states, Sweden has the highest share of energy from renewable sources. 66% of gross final energy consumption in Sweden comes from renewable energy sources. Ireland on the other hand, has the lowest proportion of renewables in the EU at 13.1%. It is evident that Ireland is not performing well when compared against our European counterparts and that urgent action is required increase the overall share of renewable energy in our gross final energy consumption.

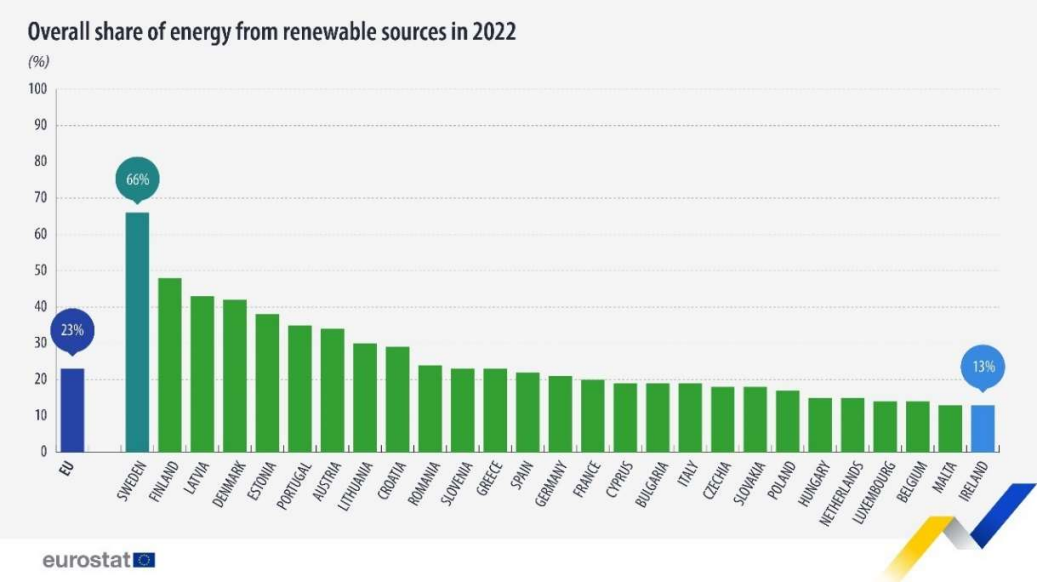


Figure 2-1: Overall share of energy from renewable sources (source: Eurostat)

When it comes to the share of renewable energy in electricity, Ireland does perform better. In 2022, 36.8% of Ireland's electricity was renewable. This puts Ireland below the EU average of 41.1%[14].

Ireland's Greenhouse Gas Emissions Projections 2024 – 2055 (May 2025)

The Environmental Protection Agency (EPA) publish Ireland's Greenhouse Gas Emission Projections and at the time of writing, the most recent report, 'Ireland's Greenhouse Gas Emissions Projections 2024–2055' was published in May 2025. The report includes an assessment of Ireland's progress towards achieving its emission reduction targets out to 2055 set out under the EU emission reduction targets as set out under the Effort Sharing Regulation.

The EPA has produced two scenarios in preparing greenhouse gas emissions projections to 2055, a "With Existing Measures" (WEM) scenario and a "With Additional Measures" (WAM) scenario. These scenarios forecast Irelands greenhouse gas emissions in different ways. The WEM scenario assumes that

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

no additional policies and measures, beyond those already in place by the end of 2023. This is the cut off point for which the latest national greenhouse gas emission inventory data is available, known as the 'base year' for projections. The WAM scenario has a higher level of ambition and includes government policies and measures to reduce emissions such as those in Ireland's Climate Action Plan 2024.

The EPA Emission Projections Update notes the following key trends:

- Ireland is not on track to meet the 51 per cent emissions reduction target (by 2030 compared to 2018) based on these projections which include most 2024 Climate Action Plan measures.
- Emissions from the Energy Industries sector are projected to decrease by between 59 and 68 per cent over the period 2022 to 2030. Renewable energy generation at the end of the decade is projected to range from 69 to 80 per cent of electricity generation as a result of a projected rapid expansion in wind energy and other renewables.
- Sectoral emissions ceilings for 2030 are projected to be exceeded by the Buildings, Electricity, Industry and Transport sectors; and met by the sector 'Other'.
- Budget period 1 (2021-2025) of 295 Mt CO2eq is projected to be exceeded by between 8 to 12 Mt CO2eq. Budget period 2 (2026-2030) of 200 Mt CO2eq is also expected to be exceeded by a significant margin of 77 to 114 Mt CO2eq (with carryover from Budget period 1).

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

National Energy Projections Report 2024

The National Energy Projections Report 2024 sets out the latest renewable energy and climate projections by the SEAI. Based on the EPA projections outlined above which were published in May 2024, the report presents the findings of the 2024 national energy and climate modelling cycle.

The most notable conclusion drawn from this year's projections is the significant gap between projections across all scenarios and legally binding national and EU targets. Even with full implementation of CAP 25, Ireland is projected to miss its national and EU climate and energy targets for 2030.

In this year's projections, in addition to the 'WEM' and 'WAM' scenarios (defined in the previous Section), the SEAI has included a 'risk' scenario, which examines the risk of delays in achieving some of the most significant and ambitious targets set in CAP24, such as the renewable electricity targets. The risk scenario for variable renewable generation capacity was developed using forecasts from surveys of expert stakeholders. The survey results indicated that there is a risk of under-delivery of 2.8 GW onshore wind by 2030.

Energy in Ireland 2024 Report

In December 2024, the Sustainable Energy Authority of Ireland (SEAI) released in annual publication '*Energy in Ireland*' report which looks at trends in national energy use and at the underlying driving forces, such as the economy and weather, and more recently the impacts of high energy prices. It also examines greenhouse gas emissions from energy use, energy security, cost competitiveness, and our progress towards EU renewable energy targets.

The Report identifies that Ireland's national energy-related emissions in 2023 were at their lowest level in over 30 years. Energy-related emissions in 2023 were 31.4 MtCO2eq, down 8.3% on 2022 levels, and lower even than those observed during the height of COVID impacts in 2020. Energy-related emissions

fell by over 2.8 MtCO2eq in 2023 - the largest annual reduction observed in 12 years. The following are some of the key points, relating to renewable energy and energy emissions:

- Ireland's national energy-related emissions have fallen for seven of the last ten years.
- 14.1% of Ireland's primary energy was renewable in 2023, with fossil fuel remaining the dominant source of Ireland's energy.
- Wind generation provided 33.7% of electricity supply in 2023.
- 2023 electricity emissions were 7.6 MtCO2eq, the lowest on record, down 22% on 2022 levels.
- 2023 was the first year in which fossil fuel generation accounted for less than half of Ireland's gross electricity supply.
- In 2023, Ireland had 4.74 GW of installed wind capacity, up 4.5% on the previous year.

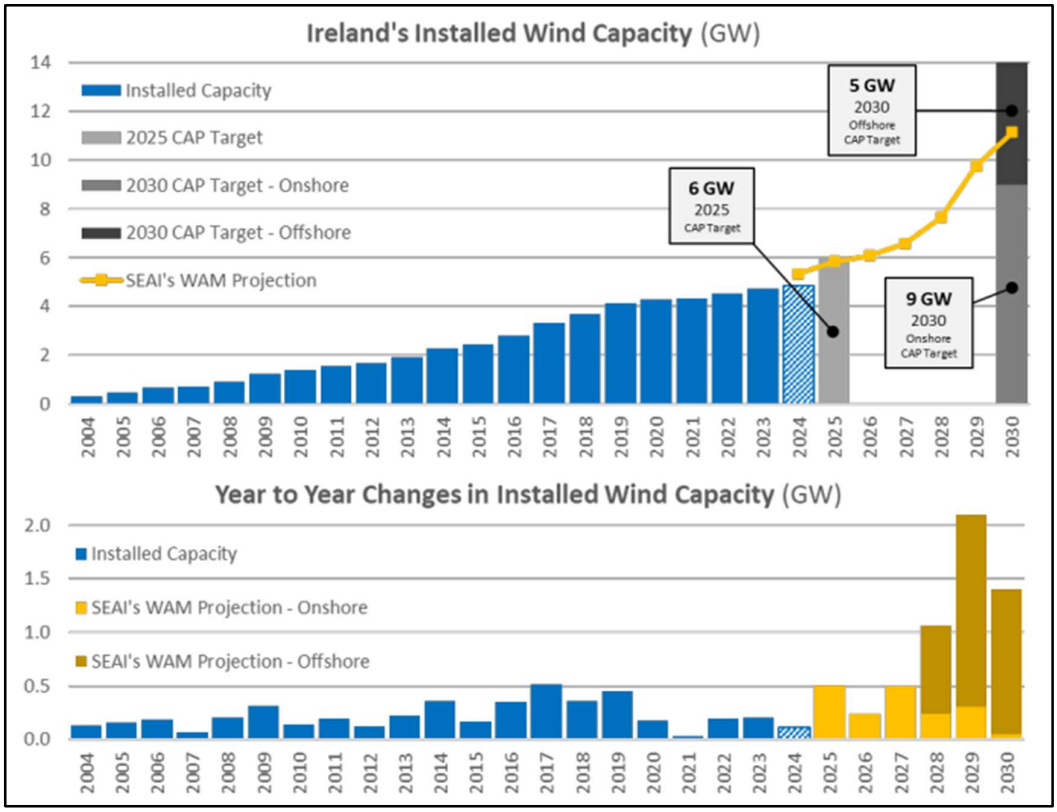


Figure 2-2: Ireland's installed wind capacity with 2024 estimates, projections to 2030, CAP targets
Source: SEAI Energy in Ireland 2024 Report, Figure 1.27

The Report states that over the last 10-years, Ireland has added wind capacity at an average rate of 0.26 GW per annum, although this has dropped to a rate of 0.14 GW over the last 5-years. To align to the pace of the 'With Additional Measures' projections needed to deliver on the 80% RES-E target, the roll-out of onshore wind capacity needs to return to the rate previously achieved between 2016 and 2019. The Report then goes on to state the following:

*"**Increasing wind generation through added wind infrastructure is key to decarbonising Ireland's electricity supply.** The decarbonisation of electricity maximised the positive impact of sustainability technologies like heat pumps and electric vehicles. The recent slow-down in added wind capacity is impacting Ireland's transition to a sustainable energy future. **Renewable capacity must be added faster than electricity demand increases. We must do everything we can to support the roll-out of both onshore and offshore wind** and grid-connected solar PV capacity".* (***emphasis*** **added**)

Ireland's Climate Change Assessment (January 2024)

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

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

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

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

The Climate Change Advisory Council Electricity Sectoral Review 2025

The Climate Advisory Council published its annual review in April 2025, it outlines detailed observations and recommendations for the Electricity sector in Ireland. This review emphasises the urgent need for Ireland to accelerate its transition to renewable energy to meet its 2030 electricity capacity targets and adhere to sectoral emissions ceilings. The Climate Change Advisory Council states:

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

Key observations in relation to Renewable Electricity are outlined below:

- *While 1.6 GW of onshore wind (0.7 GW) and solar (ca 0.9 GW) renewable projects received planning permission during 2024, only an additional 0.5 GW (0.2 GW onshore wind and 0.3 GW solar) of new utility-scale renewable capacity was connected, which is significantly below the 1.8 GW annual average increase in capacity that is required to meet 2030 targets.*

- *Dispatch-down is the practice of deliberately reducing renewable generation due to grid limitations. In 2024, the dispatch-down energy from wind resources was 1,266 GWh (10.1% of the total available wind energy) and 39 GWh from solar resources (5.3% of the total available solar energy).*

- *In addition to the 0.3 GW of grid-scale solar capacity connected in 2024, there has been a significant increase in small-scale renewable generation, comprising mainly domestic rooftop solar photovoltaic panels, with a total of 0.5 GW connected by the end of 2024 (ESB Networks, personal communication, February 2025)*

2.5 Planning Policy Context

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

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

As a renewable energy project, the Proposed Development is consistent with the overall national policy objectives to increase penetration and deployment of renewable energy resources. The specific compliance with the County Development Plan provisions are dealt with in detail in the County Development Plan sections below.

2.5.1 National Planning Policy

The Planning and Development Act 2024

The Planning and Development Act 2024 (the new Act) was signed into law by the President on the 17th of October 2024, after passing in both Houses of the Oireachtas. At the time of lodgement of this planning application, the current Planning and Development Act 2000 (as amended) (the Act) remains in place until the new Act is commenced by Ministerial Orders, with the Government indicating that this will be done on a phased basis.

National Planning Framework First Revision (2025)

In April 2025, the Government agreed to the publication of the National Planning Framework First Revision (First Revision NPF) for public consultation. The revision reflects changes to Government policy that have taken place since the initial publication of the NPF six years ago, such as climate transition.

The Revised NPF provides an updated projection for the population of Ireland, with the population expected to increase to 6.1 million by 2040. This population growth will place further demand on both the built and natural environment, and subsequently, the services required to meet said demands.

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

- **National Policy Objective 69-** *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 as expressed in the most recently adopted carbon budgets.*

- **National Policy Objective 70-** *Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a climate neutral economy by 2050.*
- **National Policy Objective 71-** *Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development.*
- **National Policy Objective 72-** *Support an all-island approach to the delivery of renewable electricity through interconnection of the transmission grid.*
- **National Policy Objective 73-** *Support the co-location of renewable technologies with other supporting technologies and complementary land uses, including agriculture, amenity, forestry and opportunities to enhance biodiversity and promote heritage assets, at appropriate locations which are determined based upon the best available scientific evidence in line with EU and national legislative frameworks.*
- **National Policy Objective 74-** *Each Regional Assembly must plan, through their Regional Spatial and Economic Strategy, for the delivery of the regional renewable electricity capacity allocations indicated for onshore wind and solar reflected in Table 9.1 below, and identify allocations for each of the local authorities, based on the best available scientific evidence and in accordance with legislative requirements, in order to meet the overall national target.*

9.1: Regional Renewable Electricity Capacity Allocations

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

Figure 2-3- Regional Renewable Electricity Capacity Allocations

- **National Policy Objective 75-** *Local Authorities shall plan for the delivery of Target Power Capacity (MW) allocations consistent with the relevant Regional Spatial and Economic Strategy, through their City and County Development Plans.*

The First Revision NPF sets out regional renewable energy capacity allocations for wind and solar energy. The Proposed Development is situated both within the Eastern and Midlands Region and Southern Region. As outlined in the strategic document each Regional Assembly will prepare a Regional Renewable Electricity Strategy (RRES), whereby additional detail will be outlined on how the regional renewable electricity capacity allocations for the region can be achieved.

The introduction of renewable energy targets represents a more active and prescriptive approach to land use planning for renewable energy development. The First Revision NPF aligns itself with the national target of 9GW of onshore wind energy and with the policies and objectives of Local Authorities.

The NPF states that accelerated delivery of additional renewable electricity generation is therefore essential for Ireland to meet its climate targets, reduce its greenhouse gas emissions, and improve its energy security by reducing reliance on imported fossil fuels and diversifying its electricity supply.

National Development Plan 2021-2030

The National Development Plan 2021 – 2030 (NDP) was published on 4th October 2021 and sets out the major public investment projects identified by Government which are to play a significant role in addressing the opportunities and challenges faced by Ireland over the coming years such as Covid-19, Brexit, housing, health, population growth, and most relevant to the subject development, climate change. It is stated that the NDP 2021 – 2030 will be the *'largest and greenest ever delivered in Ireland'* and in this regard, the NDP highlights that extensive consultation was undertaken to ensure that the plan adequately supports the implementation of climate action measures. Reflecting on the recent publication of the IPCC's 6th Assessment Report, the NDP notes that the Irish Government is fully committed to 'playing its part' to ensure that the worst climate change damage can be avoided, e.g. significant reductions in CO_2 and other greenhouse gas emissions as assisted by the achievement of both European and National renewable energy targets. Specifically, the NDP states that,

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

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

One of the NDP's strategic climate priorities in the need for low-carbon, resilient electricity systems; specifically, the plan commits to increasing the share of renewable electricity up to 80% by 2030. This is characterised by the NDP as an '*unprecedented commitment to the decarbonisation of electricity supplies*', which is certainly an ambitious and an explicit driver for the continued operation of renewable generators such as the Proposed Development. The focus of investment in renewable energy infrastructure is to contribute to a long-term, sustainable and competitive energy future for Ireland.

2.5.1.2 Project Compliance with the National Planning Policy

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

The National Planning Framework First Revision (2025) reflects updated government policies, particularly in response to climate transition. It emphasizes the accelerated development of renewable energy infrastructure, introducing specific regional capacity targets for wind and solar energy.

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

2.5.2 Regional Policy Context

Regional Spatial & Economic Strategy for the Eastern and Midland Regional Assembly

The Midlands Regional Area was amalgamated within the Eastern and Midland Regional Assembly (EMRA) as of January 2015. The Region covers nine counties containing twelve Local Authorities namely – Longford, Westmeath, Offaly, Laois, Louth, Meath, Kildare, Wicklow, Fingal, South Dublin

and Dún Laoghaire-Rathdown County Councils and Dublin City Council. As part of the Proposed Development site is located in County Laois, this Strategy is relevant here. One of the principal functions of the Assembly is to deliver a Regional, Spatial and Economic Strategy (RSES) which considers both spatial and economic factors within the regional planning framework. The principal statutory purpose of the RSES for the Eastern and Midland Region is to support the implementation of the Ireland 2040 NPF / NDP and the economic policies and objectives of the Government. Specifically, the RSES will provide a range of plans and strategies relevant to the Ireland 2040 NPF / NDP.

The RSES sets out a Vision Statement which is underpinned by three key cross-cutting principles which best reflect the challenges and opportunities of the Region: healthy placemaking; climate action; and economic opportunity.

> *"To create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all."*

Climate action is described as the need to enhance climate resilience and to accelerate a transition to a low carbon society recognising the role of natural capital and ecosystem services in achieving this. Chapter 7 of the RSES covers the regions plans for the Environment and Climate, and under section 7.9, the RSES sets out the theme of climate change within the region. Under this the RSES is noted:

> "*Climate change is a global challenge which requires a strong and coherent response at national, regional and local level. Observations show that Ireland's climate is changing in terms of sea level rise, higher average temperatures, changes in precipitation patterns, more frequent weather extremes, the spread of invasive alien species and increased risk of wildfires, for example upland gorse fires. These changes are projected to continue over the coming decades. Climate change will have diverse and wide-ranging impacts on the Eastern and Midland Region's environment, society and economic development, including managed and natural ecosystems, water resources, agriculture, food security and bioeconomy, human health and coastal zones.*"

It is recognised that climate change is impacting and will continue to impact many of the policies and objectives contained in the RSES, and as such, informs policies including those in relation to flood risk management and surface water drainage, settlement strategy, transport, waste management, water services, energy, natural heritage, and green and blue infrastructure.

With regards to the current situation, the RSES notes an overall increase in greenhouse gas emissions from most sectors. The main emissions sources which are relevant to the EMRA Region include electricity, built environment, the transport sector and agriculture. To support transition to a low carbon, circular & climate resilient region, the Eastern and Midland Regional Assembly is committed to the Region becoming a low-carbon and circular region. This will require reduction of all greenhouse gases, of which carbon dioxide is the most prominent. The priority is to minimise energy demand and waste and then address how energy will be supplied and renewable technologies incorporated. In order to address this, it is necessary to reduce the effects of climate change through settlement and travel patterns, energy use, waste and protection of green infrastructure. The following Regional Policy Objectives (RPO's) have been proposed:

- **RPO 7.31**: Within 1 year of carrying out a regional emissions assessment, EMRA shall compile and publish an emissions inventory and, in collaboration with the relevant departments and agencies, agree emissions reductions targets in accordance with agreed national sectoral plans and to support an aggregate 40% reduction in greenhouse gas emissions by 2030 in line with the EU 2030 Framework.
- **RPO 7.32**: With the assistance and support of the Climate Action Regional Offices, local authorities shall develop, adopt and implement local climate adaptation and mitigation strategies which shall address issues including local vulnerability to climate risks and

identify and prioritise actions, in accordance with the Guiding Principles of the National Adaptation Framework, National Mitigation Plan.

According to the RSES, the Dublin and Eastern Regions are a major load centre on the Irish electricity transmission system; specifically, approximately one third of total electricity demand is located in these regions. Having regard to projected population and economic growth in the eastern region, the RSES notes that the increasing demand for electricity in the region must be addressed in a way which balances the need for a significant shift towards renewable energy and enabling resources to be harnessed in a manner consistent with the principles of proper planning and sustainable development.

- Facilitating the provision of appropriate renewable energy infrastructure and enabling technologies;
- Expansion and upgrading of the grid with the aim of increasing the share of variable renewable electricity;
- Onshore wind, bioenergy, solar and offshore energy;
- Moving from carbon intense fossil fuel generation to lower emissions fuels such as natural gas; and
- The need to ensure sufficient electricity to meet increased demand.

The RSES supports an increase in the amount of new renewable energy sources in the Region, including provisions for wind energy (both onshore and offshore), biomass, and solar photovoltaics and solar thermal, both on buildings and at a larger scale on appropriate sites in accordance with National policy and the Regional Policy Objectives outlined in this Strategy. The proposed renewable energy development would contribute to increasing the levels of renewable energy supply in a manner consistent with the proper planning and sustainable development of the area/region. Therefore, the Proposed Development is consistent with the provisions of the RSES.

The following RPO's have also been listed within the RSES:

- **RPO 7.35**: EMRA shall, in conjunction with local authorities in the Region, identify Strategic Energy Zones as areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas. The Strategic Energy Zones for the Region will ensure all environmental constraints are addressed in the analysis. A regional landscape strategy could be developed to support delivery of projects within the Strategic Energy Zones.
- **RPO 7.36**: Planning policy at local authority level shall reflect and adhere to the principles and planning guidance set out in Department of Housing, Planning and Local Government publications relating to 'Wind Energy Development' and the DCCAE Code of Practice for Wind Energy Development in Ireland on Guidelines for Community Engagement and any other relevant guidance which may be issued in relation to sustainable energy provisions.

The key drivers for the development and implementation of new infrastructure within the region are climate action and environmental sustainability. In this context, the RSES notes the following on the theme of infrastructure:

> *"The sustainable growth of the Region requires the provision of services and infrastructure in a plan led manner to ensure that there is adequate capacity to support future development. High-quality infrastructure is an important element of a modern society and economy, it provides essential functions and services that support societal, economic and environmental systems at local, regional and national levels."*

As noted above, a 'secure and resilient' supply of energy is critical to a well-functioning region. As population projections are set to increase into the future for the EMRA, the demand for energy and associated infrastructure is set to increase. To meet the State's energy targets, in addition to regional demand, the RSES states that the region will need to better leverage natural resources to increase our

share of renewable energy. Relevant to the Proposed Development, there is an established tradition of energy production in the Midland counties by state agencies; however, key planning, environmental and commercial issues are dictating the wind down of traditional fossil fuel powered stations, such as peat fired power plants (Shannonbridge and Lough Ree Power Stations) in these counties. The subsequent diversification of energy production within the region towards green energy, such as wind, solar and biomass, will require the progressive and strategic development of a different form of energy grid. The RSES also emphasises that it will also be necessary to ensure more geographically focused renewables investment to minimise the amount of additional grid investment required, for example through co-location of renewables and associated grid connections.

The RSES has identified a number of key RPOs which have been designed to ensure the development of the energy networks in a safe and secure way to meet projected demand levels, to meet Government Policy, to ensure a long-term, sustainable and competitive energy future for Ireland to transition to a low carbon economy by 2050:

- **RPO 10.20**: Support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the Region and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this Strategy. Including the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity and gas transmission grid in a sustainable and timely manner subject to appropriate environmental assessment and the planning process.
- **RPO 10.22**: Support the reinforcement and strengthening of the electricity transmission and distribution network to facilitate planned growth and transmission/ distribution of a renewable energy focused generation across the major demand centres to support an island population of 8 million people, including:
- Facilitate the delivery of the necessary integration of transmission network requirements to allow linkages of renewable energy proposals to the electricity transmission grid in a sustainable and timely manner

Regional Spatial & Economic Strategy for the Southern Region

The Southern Regional Assembly ('SRA') was established in 2015, the Regional Spatial and Economic Strategy ('RSES') for the Southern Region (Carlow, Clare, Cork, Kerry, Kilkenny, Limerick, Tipperary, Waterford and Wexford) came into effect on 31st January 2020. As a portion of the Proposed Development is located in County Kilkenny, this RSES is relevant here. The RSES provides a long-term, strategic development framework for the future physical, economic and social development of the Southern Region. The RSES seeks to achieve balanced regional development and full implementation of Project Ireland 2040 – the National Planning Framework. The RSES aims to build on the region's strengths and potential to become a more prosperous, sustainable, climate resilient and attractive region for the benefit of all its people. up to 2040 and beyond.

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

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

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

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

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

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

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

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

- **RPO 99 (Renewable Wind Energy)**: *It is an objective to support the sustainable development of renewable wind energy (on shore and offshore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.*

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

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

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

2.5.3 Project Compliance with Regional Planning Policy

The Southern Regional Assembly states that its region has a crucial role to play in Irelands transition to a low carbon future, this is further echoed by the key principles laid out in the Eastern and Midlands Regional Assembly RSES. In order to utilise the wind energy resource offered around the area of the Proposed Development in Co. Laois and Co. Kilkenny, the Proposed Development will directly contribute to the achievement of a sustainable, secure and resilient energy supply in a manner consistent with the proper planning and sustainable development of the area/region.

2.5.4 Local Policy

2.5.4.1 Kilkenny City and County Development Plan 2021-2027

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

Draft Ministerial Direction

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

> *"In accordance with Section 31(4) of the Planning and Development Act 2000, those parts of the Kilkenny City and County Development Plan 2021 – 2027 Plan referred to in the notice shall be taken not to have come into effect, been made or amended; namely;*
>
> *Chapter 11 Renewable Energy: Section 11.4 Kilkenny Targets, Section 11.5.1 Current status and targets and Figure 11.4 Wind Strategy areas.*
>
> *The Planning Authority is awaiting a further direction from the Minister in this regard. Consequently, the Renewable Energy policies and Wind Strategy areas as previously set out in the Kilkenny City and County Development Plan 2021- 2027, cannot be taken into account at this time."*

The reason for the draft direction is as follows:

1. The Development Plan as made is inconsistent with Ministerial Guidelines issued under Section 28 of the Act, specifically item 2 of the Specific Planning Policy Requirement contained in the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (July 2017), which sets out the requirement for the Planning Authority to comply with the aforementioned Specific Planning Policy Requirement under section 28(1C). In particular, the Development Plan fails to identify renewable energy targets (in megawatts) which Kilkenny can contribute in delivering its share of overall government targets on renewable energy and climate change mitigation over the plan period.

2. The Development Plan contains conflicting objectives on renewable energy sustainable development and climate action such that the adopted Plan, without providing sufficient compensatory measures, significantly reduced the extent of the areas indicated as 'acceptable in principle' that were identified in the draft Development Plan as being necessary to achieve the **target of 201MW required to ensure that 100% of**

electricity demand for Kilkenny is met from renewable sources by 2030 and to ensure consistency with the Climate Action Plan.

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

Relevant Policies and Objectives

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

Climate change mitigation and adaptation objectives have been incorporated into the policies of the KCCDP. The strategic aim for climate change, as set out in Chapter 2, of the KCCDP is as follows:

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

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

- ***2B:*** *To support the implementation of the National Climate Action Plan and the National Climate Action Charter for Local Authorities, and to facilitate measures which seek to reduce emissions of greenhouse gases by embedding appropriate policies within the Development Plan.*
- ***2C:*** *To promote, support and direct effective climate action policies and objectives that seek to improve climate outcomes across the settlement areas and communities of County Kilkenny helping to successfully contribute and deliver on the obligations of the State to transition to low carbon and climate resilient society.*
- ***2E****: To ensure that the Development Plan transposes, supports and implements strategic objectives of the National Planning Framework and the Southern Regional Spatial and Economic Strategy to create an enabling local development framework that: (a) promotes and integrates important climate considerations in local development and the assessment of planning applications and (b) supports the practical implementation of national climate policy and targets to assist in the delivery of the national transition objective.*
- ***2G:*** *To reduce energy related CO2 emissions of Kilkenny County Council.*
- ***2H:*** *To achieve the commitment under the European Climate Alliance to the reduction of greenhouse gas emissions by 10 percent every 5 years.*

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

- An analysis of the resource potential,

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

The KCCDP acknowledges that Ireland and Kilkenny have excellent renewable energy resources, which will be a critical and growing component of Irish energy supply. The strategic aim for renewable energy, set out in Chapter 11 of the KCCDP, sets a clear, ambitious target:

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

The following objective highlights the Council's support for the deployment of renewable energy projects in the county:

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

It is estimated that, by 2030, County Kilkenny will use 633 Gigawatt hours (Gwh) of electricity, as stated in the KCCDP. If County Kilkenny is to reach its strategic aim of generating 100% of their electricity demand, they will need to install 253MW of energy or "2.09% of the Country's 12.1 GW combined onshore and offshore renewable energy target" as stated in the KCCDP. The Proposed Development will contribute towards achieving this important target by supplying 48MW of energy to the national electricity grid or 19% of the 253MW needed.

Development Management Guidance

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

In the absence of KCC's Wind Energy Strategy due to the draft ministerial direction on the KCCDP, it is noted that the design and layout of the Proposed Wind Farm follows the recommendations and guidelines set out in the '*Wind Energy Development Guidelines for Planning Authorities'* (the Guidelines) published by the then Department of Environment, Heritage and Local Government (DEHLG) in 2006, and the *'Best Practice Guidelines for the Irish Wind Energy Industry'* published by the Irish Wind Energy Association in 2012. The design and layout of the Proposed Wind Farm also has regard to the *'Draft Wind Energy Guidelines*' (the draft Guidelines) published by the DHELG in 2019. Should the draft Guidelines be adopted in advance of a planning decision being made on Seskin Renewables Wind Farm, the Proposed Development will be capable of achieving the requirements of the draft Guidelines as currently proposed.

Landscape Policy

Chapter 9 of the KCCDP sets out landscape policy for the development of County Kilkenny. The *'Landscape Character Assessment'* divides the county into four landscape character types (LCTs); *Upland Areas, Lowland Areas, River Valleys, and Transitional Areas*. The portion of the Proposed Seskin Wind Farm in County Kilkenny is located in an area designated as '*Upland Area'*. There are no protected views in close proximity to the site. Furthermore, the subject site area is not identified as being '*highly scenic'* or *'visually pleasing'* on the Landscape Character Assessment map.

'*Development Management Requirements*' are included in the KCCDP, with the following statement relevant to the Proposed Development:

> *'To facilitate, where appropriate, developments that have a functional and locational natural resource requirement to be situated on steep or elevated sites (e.g. reservoir, telecommunications or* ***wind energy structures****) with reference to the appropriate County strategies currently in place, and to ensure that any residual adverse visual impacts are minimised or mitigated.'* (**emphasis added**)

It is evident that KCC support the principle of providing a wind energy development at the subject site, as the Proposed Development has a functional/locational requirement to be located on an elevated site. This is due to the fact that viable wind farm sites are often located in elevated areas due to the increased wind resource available and the lower population densities, allowing for reduced impacts on residential amenity.

Kilkenny Wind Energy Development Strategy 2021

The Wind Energy Development Strategy (WEDS) for KCC forms Appendix K of the KCCDP. The WEDS provides a clear framework for the Council's objectives and methodology for identifying suitable locations for wind energy development in the county. The key objectives of the WEDS are set out below:

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

Chapter 5 of the WEDS characterises the county into three different policy areas aimed at facilitating wind farm growth. This division is the result of evaluating the feasibility in comparison to other factors. These zones are labelled as "Acceptable in Principle," "Open for Consideration," and "Not Normally Permissible." The Proposed Development is located in an area designated as 'Open to Consideration'. These areas are defined as *"characterised by no significant conflict with environmental designations or sensitivities"*. **Figure 1-4** shows the proposed development Site Boundary in relation to the wind energy classifications.

The Wind Energy Strategy also sets out four different categories of wind energy developments depending on their scale with the Proposed Development falling within the 'Large scale wind developments' category. The Wind Energy Strategy states the following in relation to 'large scale wind energy developments', which are classified as wind energy projects above 5MW:

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

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

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

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

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

In similar circumstances in the absence of specific local policy, Planning Authorities have found that there is a comprehensive range of guidance and policy objectives at a national and regional level generally in relation to windfarm developments, and while certain aspects of the KCCDP are not in effect, this does not imply that there is a complete vacuum or lacuna in policy which precludes the Planning Authority from determining the application before it in accordance with the proper planning and sustainable development of the area.

Full details of compliance of the Proposed Development with relevant Policies and Objectives and Development Management Guidance of the KCCDP is set out in Section 5.2.1 of the Planning Report which accompanies the planning application to KCC.

2.5.4.1.2 *Compliance with Kilkenny Local Policy Objectives*

Despite the absence of a local Wind Energy Strategy for Kilkenny as discussed in Section 1.5.4 above, it is considered that due to the comprehensive suite of international, national, regional and local policy support for wind energy, the principle of the Proposed Development at this location is acceptable.

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

2.5.4.2 Laois County Development Plan 2021-2027

The Laois County Development Plan 2021-2027 (LCDP) was adopted on the 25th January 2022 and came into effect on the 8th March 2022. The LCDP sets out a framework for the sustainable spatial and physical development of County Laois while considering the conservation and protection of the built and natural environment.

Ministerial Direction

A ministerial direction was issued by the minister on the LCDP on the 28th September 2022. The ministerial direction directed Laois County Council (LCC) to remove the development control standard which required wind energy developments to adhere to a setback of 1.5km from schools, dwellings, community centres and all public roads. The amended version of the LCDP, published in January 2022, removed the 1.5km setback distance policy from the Wind Energy Strategy.

Relevant Policies and Objectives

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

Climate change mitigation and adaptation objectives have been incorporated into the policies of the LCDP. The strategic aim for climate change, as set out in Chapter 3, of the LCDP is as follows:

"To 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."

The LCDP has aligned its policy and objectives with the Strategic Objectives of the National Planning Framework and the RSES to maintain and improve the County's attraction in order to maximise investment opportunities. The LCDP sets out a number of Strategic Objectives relating to climate action including the following:

The LCDP incorporates numerous policies and objectives aimed at enabling the county to transition effectively to a low-carbon, climate-resilient environment. The most relevant of these are outlined below:

- **CA 1:** *Support and facilitate European and national objectives for climate adaptation and mitigation as detailed in the following documents, taking into account other provisions of the Plan (including those relating to land use planning, energy, sustainable mobility, flood risk management and drainage):*
    - *Climate Action Plan (2019 and any subsequent versions);*
    - *National Climate Change Adaptation Framework (2018 and any subsequent versions);*
    - *Any Regional Decarbonisation Plan prepared on foot of commitments included in the emerging Regional Spatial and Economic Strategy for the Eastern and Midland Region;*
    - *Relevant provisions of any Sectoral Adaptation Plans prepared to comply the requirements of the Climate Action and Low Carbon Development Act 2015, including those seeking to contribute towards the National Transition Objective, to pursue, and achieve, the transition to a low carbon, climate resilient and environmentally sustainable economy by the end of the year 2050; and • Laois Climate Change Adaptation Strategy 2019-2024.*

- **CM RE 1:** *Prepare a Renewable Energy Strategy (RES) for County Laois including to identify the target which County Laois can contribute in delivering its share of overall Government targets on renewable energy and climate change mitigation over the plan period, and in particular wind energy production and the potential wind energy resource (in megawatts), and commencement of the variation to the County Development Plan within 1 year of adoption of the plan. Once adopted this will be by way of a variation to the Laois County Development Plan.*

- **CM RE 2:** *Promote and encourage the development of energy from renewable sources such as hydro, bio-energy, wind, solar, geothermal and landfill gas subject to compliance with normal planning and environmental criteria in co-operation with statutory and other energy providers.*

- **CM RE 3:** Promote County Laois as a low carbon county a mean of attracting inward investment and to facilitate the development of energy sources *which will achieve low carbon outputs.*

- **CM RE 4:** *Protect areas of recognised landscape importance and significant landscape views from construction of large scale visually intrusive energy transmission infrastructure, alternative routing or transmission methods shall be used in this instance. Ensure that the assessment of energy development proposals will have regard to the impacts on public rights of way and walking routes.*

- **CM RE 5:** *Promote and facilitate wind energy development in accordance with the Guidelines for Planning Authorities on Wind Energy Development (Department of Housing, Planning and Local Government) and any update thereof and the Appendix 5 Wind Energy Strategy of this Plan, the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change, and subject to compliance with normal planning and environmental criteria.*

- **CM RE 6:** *Ensure a setback distance for Wind turbines from schools, dwellings, community centres and all public roads in all areas open for consideration for wind farm development as per the Guidelines for Planning Authorities on Wind Energy Development (Department of Housing, Planning and Local Government)*

- **CM RE 12:** *Development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process.*

In addition to the objectives outlined, LCC commits itself to working with key stakeholders to help realise *"overall national targets on renewable energy and climate change, and in particular wind energy production and the potential wind energy resource."*

A full breakdown of the compliance of the Proposed Development against relevant Policies and Objectives and Development Management Guidance of the LCDP is set out in Section 5.2.2 of the Planning Report which accompanies the planning application.

Landscape Policy

The Landscape Policy in County Laois is set out in Appendix 6 of the LCDP '*Landscape Character Assessment'.* County Laois is divided into 6 Landscape Character Types (LCTs). These are Mountains, Hills and Upland Areas, Lowland Agricultural Areas, River Corridors and Lakes, Peatland Areas, Urban Fringe Areas, Rolling Hill Areas. The portion of the Proposed Wind Farm site situated in County Laois, is located in the LCT '*Mountains, Hills and Upland Areas'.*

Four scenic views are located west and southwest of the site, **however none of these scenic views directly face the onto the site.**

Appendix 6 of the LCDP includes the following landscape policy objective:

> ***"LCA 7:*** *Facilitate, where appropriate, developments that have a functional and locational requirement to be situated on steep or elevated sites (e.g. reservoirs, telecommunication masts or wind energy structures) where residual adverse visual impacts are minimised or mitigated"*

This objective demonstrates LCC's commitment to facilitate developments in upland areas where they have a functional requirement, such as wind energy developments. As the portion of the Proposed Development located in County Laois is located in area classified as *'Mountain, Hills and Upland Areas',* the LCDP is supportive of the Proposed Development.

This objective demonstrates LCC's commitment to facilitate developments in upland areas where they have a functional requirement, such as wind energy developments. Given that the portion of the Proposed Development located in County Laois is located in area an classified as *'Mountain, Hills and Upland Areas',* this policy supports the siting of the Proposed Development in this location.

Although turbines T1 and T2 located in an area designated as *"Not Open to Consideration"* as part of the LCDP's Wind Energy Strategy, due to the proximity of this location to the Cullahill Mountain, it is important to note that the turbines are located a significant distance away, approximately 6km north-east of the Mountain.

Section 14.7.3.2.6 of the LVIA submitted with the EIAR concludes the that the Proposed Development is not likely to result in significant visual impacts on the setting of Cullahill Mountain. Although the Zone of Theoretical Visibility indicates theoretical visibility for some areas of the mountain, on-site visibility appraisal and photowire imagery demonstrate that the turbines will be visually screened from the Cullahill walking trails by dense vegetation.

Overall, visual impacts on Cullahill Mountain are assessed as 'Imperceptible'.

Wind Energy Strategy

Appendix 5 of the LCDP sets out the Wind Energy Strategy (WES) for County Laois. It recognises that wind is *"one of Ireland's greatest natural* resources*"* and that *"renewable energy will be a vital part of Ireland's strategy to … ensuring a secure supply of energy and combating climate change".* The following objective transcribes this view into policy:

> ***WES 1: Development of Renewable Energy Generation*** *– It is the policy of the Council to support, in principle and in appropriate scales and locations, the development of wind energy resources in County Laois. The future sustainable development of the County is dependent on a secure supply of energy. There is a need to promote the development of renewable energy to reduce dependency on fossil fuels and to comply with national and European policies with regards to renewable energy resources and to address the challenge of climate change. It will be an objective of the Council to ensure the security of energy supply by accommodating the development of wind energy resources in appropriate areas and at appropriate scales in the country.*

The Laois Wind Energy Map, included in Appendix 5, subdivides County Laois into three wind energy zoning areas. The portion of the Proposed Development which falls within the LCC administrative contains 2 no. turbines of the total proposed 8 no. turbines. This area is designated as "Areas Not Open for Consideration" and is defined as follows:

> *"**WES 7: Areas Not Open for Consideration** - These areas are not considered suitable for wind farm development due to their overall sensitivity arising from landscape, ecological,*

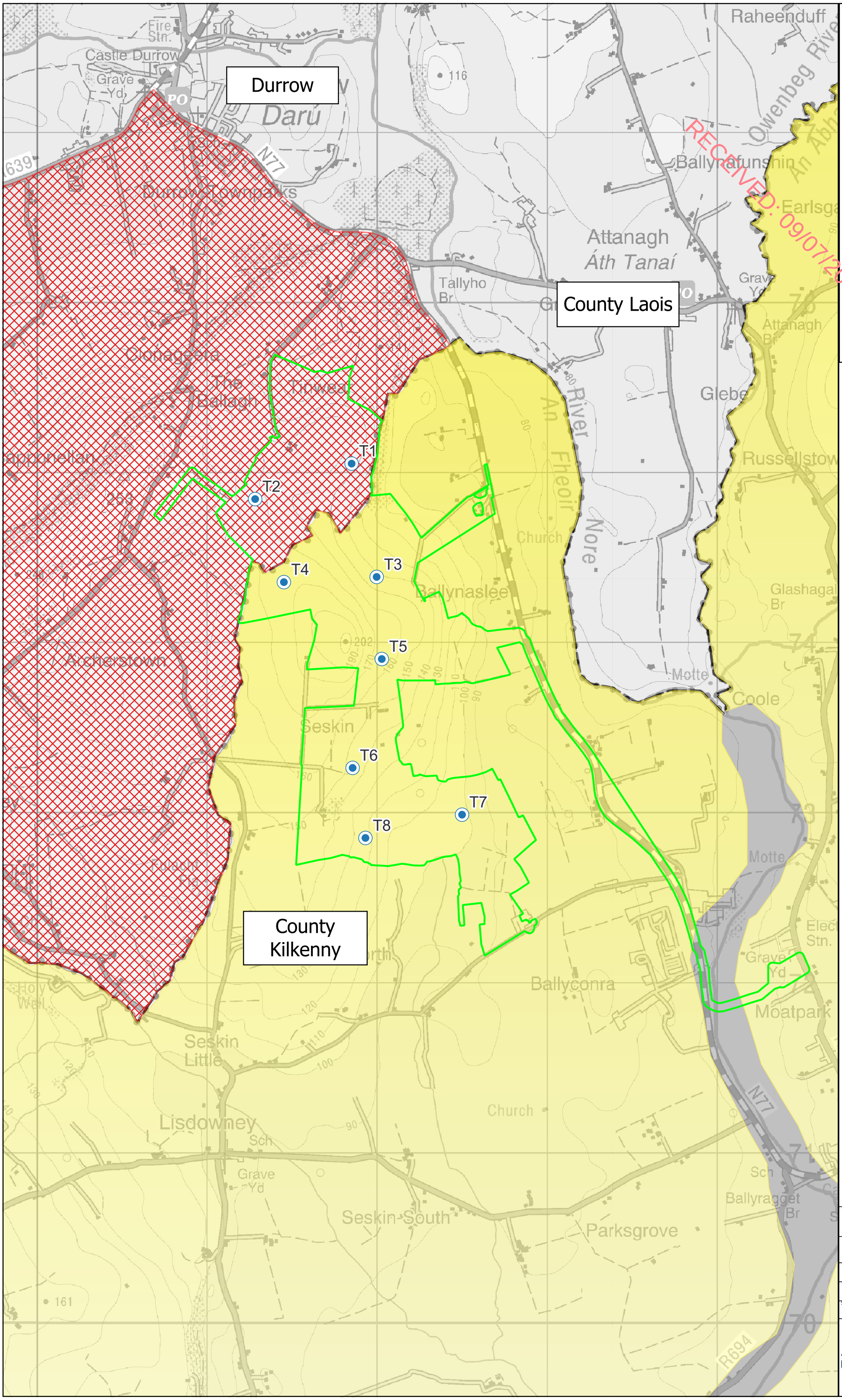
recreational and slash or cultural and built heritage resources as well as their limited wind regime."

Figure 2-4 below shows the proposed development boundary in relation to the wind energy classifications. It should be noted that the wind energy zoning designations, in regard to the Proposed Wind Farm site, differ between the LCDP and the KCCDP, despite the respective portions of lands being located adjacent to each other. It is worth highlighting that in their respective landscape character assessments, the Proposed Wind Farm site is designated as *'Uplands Area'* in the case of the KCCDP, and as '*Mountains, Hills and Upland Areas'* in the LCDP, providing a consistency regarding an assessment of the landscape. As previously mentioned, the landscape policies for both the LCDP and KCCDP support the facilitation of wind energy developments in upland areas which favours the location of the Proposed Development.

2.5.4.2.2 Compliance with the Laois Local Policy Objectives

The LCDP is supportive of renewable energy developments, such as the Proposed Development, as it sets out it's support for the development of renewable resources and more specifically, it's aim to facilitate wind energy developments in appropriate locations. Despite the location of a portion of the Proposed Development in an area deemed as *'Not Open for Consideration'* within the LCDP, there are objectives within the LCDP to support the location of wind energy developments in areas designated as '*Mountains, Hills and Upland Areas'*, of which the Proposed Development is located.

Please refer to the Planning Report for a detailed justification of why the turbines are located within this area.



Drawing Title
Wind Energy Strategy Areas

Project Title
Seskin Renewables Wind Farm

Drawn By	Checked By
ER	EM
Project No.	Drawing No.
231103	Figure 2-4
Scale	Date
1:20,000	2025-06-26

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2.5.5 Other Relevant Material Considerations

DoEHLG Wind Energy Guidelines 2006

In June 2006, the then Department of Environment, Heritage and Local Government (DoEHLG) published '*Wind Energy Development Guidelines for Planning Authorities'* (the Guidelines) under Section 28 of the Planning and Development Act, 2000 (as amended). The aim of these guidelines was to assist the proper planning of wind power projects in appropriate locations around Ireland. The Guidelines highlight general considerations in the assessment of all planning applications for wind energy. They set out advice to planning authorities on planning for wind energy through the development plan process and in determining applications for planning permission. They contain guidelines to ensure consistency of approach throughout the country in the identification of suitable locations for wind energy development.

Each wind project has its own characteristics and defining features, and it is therefore impossible to write specifications for universal use. Guidelines should be applied practically and do not replace existing national energy, environmental and planning policy. While the 2006 Guidelines remain the relevant guidelines in place, at the time of lodgement, decision makers (Planning Authorities and An Coimisiún Pleanála) are not bound to their provisions and they can (and do) consider updated standards/requirements/specifications in assessing impacts and the proper planning and sustainable development of the area.

Draft Revised Wind Energy Guidelines 2019

The Department of Housing, Planning and Local Government published the *Draft Wind Energy Guidelines* (referred to as the Draft Guidelines) in December 2019. The Draft Guidelines were open to public submissions up until the 19th of February 2020. These submissions are now being considered by the Department. At time of writing, the guidelines in place remain the 2006 Guidelines pending the Department publishing a final version of any revised guidance.

The Draft Revised Guidelines clearly sets out the recognition that the proper planning and sustainable development of areas and regions must be taken into account when local authorities prepare their development plans and assess planning applications, irrespective of the significant role renewable energy has to play in tackling climate change.

The Draft Revised Guidelines note that potential impacts of wind energy development proposals on the landscape, including the natural and built environment, must be considered along with the legitimate concerns of local communities. With this in mind, and in line with the previously stated "preferred draft approach", the 2019 Draft Revised Guidelines primarily focus on addressing a number of key aspects including, but not limited to:

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

The submission period for the Draft Revised Guidelines closed in February 2020. Under the consultation it was evident that a number of submissions made appeared to have observations surrounding similar points, these include but are not limited to themes such as noise, visual amenity set back and shadow flicker. With regards to noise, a number of the received submissions noted that the provisions put forward in the Draft Revised Guidelines were unworkable, as such it was considered that

should the noise measures be implemented there is the potential for an on-going impact on the development of onshore wind energy in the future. In relation to set back distances there was strong criticism with regards to this distance being measured to the curtilage of a property due to this measurement being ambiguous and difficult to implement. Furthermore, questions were raised surrounding the strict measures which have been put in place surrounding shadow flicker, the Draft Guidelines put forward the provision that '*there will be no shadow flicker at any existing nearby dwelling or other relevant existing affected sensitive property*'. While the overall provision is possible a number of clarifications were sought to ensure that this provision could be implemented in a reasonable manner.

At time of writing the Draft Guidelines are not yet finalised and are not in force, with the relevant guidelines for the purposes of section 28 of the Planning and Development Act 2000 (as amended) remaining those published in 2006. Notwithstanding this, however, due to the timelines associated with the planning process for renewable energy projects it is possible that an updated version of the Draft Guidelines may be finalised during the consideration period for the current Proposed Development. On the basis of the details available in the Draft Guidelines, it is anticipated that the Proposed Development will be capable of adhering to the relevant noise and shadow flicker standards through the implementation of the mitigation measures, albeit without sight of the final, adopted Guidelines the processes by which this compliance can be achieved cannot be confirmed at this stage.

IWEA Best Practice Guidelines for the Irish Wind Energy Industry 2012

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

IWEA Best Practice Principles in Community Engagement and Community Commitments 2013

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

Further details on the community engagement that has been undertaken as part of the Proposed Development are presented below.

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

In December 2016, the Department of Communications, Climate Action and Environment (DCCAE) issued a Code of Practice for wind energy development in relation to community engagement. The

Code of Good Practice is intended to ensure that wind energy development in Ireland is undertaken in adherence with the best industry practices, and with the full engagement of local communities. Community engagement is required through the different stages of a project, from the initial scoping, feasibility and concept stages, right through construction to the operational phase. The methods of engagement should reflect the nature of the project and the potential level of impact that it could have on a community. The guidelines advise that ignoring or poorly managing community concerns can have long-term negative impacts on a community's economic, environmental or social situation. Not involving communities in the project development process has the potential to impose costly time and financial delays for projects or prevent the realisation of projects in their entirety.

Department Circular PL5/2017

On the 3rd of August 2017, the (then) Department of Housing, Planning and Local Government issued Circular PL5/2017 to provide an update on the review of the wind energy and renewable policies in development plans, and the advice contained within a previous Departmental Circular PL20-13. Circular PL20-13 advised that local authorities should defer amending their existing Development Plan policies in relation to wind energy and renewable energy generally as part of either the normal cyclical six-yearly review or plan variation processes and should instead operate their existing development plan policies and objectives until the completion of a focused review of the Guidelines. The new circular (PL05/2017) reconfirms that this continues to be the advice of the Department.

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

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

Commission for Regulation of Utilities: Grid Connection Policy

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

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

Renewable Energy Support Scheme

The CAP25 is the Government's plan to give Irish people a cleaner, safer and more sustainable future to halve emissions by 2030 and reach net zero no later than 2050. The Plan sets out actions across every sector which will ensure we meet our future climate commitments. A key part of the CAP25 is to increase the proportion of renewable electricity to up to 80% by 2030 and a target of 9GW from onshore wind. These measures will be driven by introduction of the Renewable Electricity Support Scheme ('RESS') which aims to promote the generation of electricity from renewable sources.

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

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

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

The Proposed Development is in accordance with the CAP25 and a grant of permission for the onshore wind energy development will allow for the Proposed Development to participate in the RESS auction and contribute renewable energy generation in achieving Irelands CAP25 target of 9GW of onshore wind generation by 2030.

2.6 Planning History

2.6.1 Planning Applications with the application site boundary

A planning search was carried out through Laois County Council and Kilkenny County Council online planning portal in June 2025 for relevant planning applications within the red line planning application site boundary (as shown in Figure 1-4 in Chapter 1 of this EIAR). 12 no. planning permissions were identified within the red line planning application boundary. The planning applications within the red line boundary are outlined in Table 2-2 below.

Table 2-2: Planning applications within the red line planning application boundary

Pl. Ref.	Planning Authority	Description	Received Date	Decision
2560219	Kilkenny County Council	For development at their Dairy Processing Plant in Ballyconra, Ballyragget, Co Kilkenny- Demolition of an existing diesel bund, a chemical storage bund, and of an existing IBC containment area and for the reconstruction of all, at revised locations. - Construction of a two-storey process building. - Construction of a 6-bay intake / dispatch canopy and associated single storey services and welfare building. - Construction of a refrigeration building with roof mounted mechanical equipment, a transformer enclosure, a chilled water storage tank and a hot water storage tank - Construction of a CIP centre complete with associated tanks and vessels and a hot water storage tank adjacent. - Construction of a new chemical storage bund and relocation of an existing permeate storage silo. - Construction of a silo base and plinth for the housing and installation of 10 number silos. - Installation of a modular site cabin and a lightweight metal shed. - Construction of a penthouse roof arrangement, installation of roof mounted transformers and roof mounted air handling equipment. - Construction of an extension to an existing car park complete with modified access - Construction of a new internal access road and for the widening and realignment of the existing internal road network. - Construction, incorporating modifications to an existing external stair and retaining wall arrangement. - Associated site works including earthworks, berm formation, retaining walls, pipe and service bridges, fencing and screening and drainage works including a new process effluent line with overground and below ground sections, and all associated site works including landscaping. This facility holds an industrial emissions licence issued by the Environmental Protection Agency. An Environmental Impact	24/04/2025	New Application

		Assessment Report (EIAR) and a Natura Impact Statement (NIS) will accompany this application.		
21882	Kilkenny County Council	For the installation of 2 new cooling tower units and associated concrete bases at the existing Waste Water Treatment Plant and associated ancillary site works. Upgrade works to the existing watermain consisting of the installation of a new watermain connecting existing water reservoir tank in the Glanbia Milk Processing Facility to the existing pump house including the crossing of the N77 public road and all ancillary site works. Upgrade of the existing effluent line to include the construction of a new effluent line connection from the Glanbia Milk Processing Facility and the existing Waste Water Treatment Plant including a crossing of the N77 public road and all ancillary site works. Installation of services across the N77 public road and all ancillary site works. The milk processing facility holds an industrial emissions licence issued by the Environmental Protection Agency. A Natura Impact Statement has been prepared and accompanies this application.	26/10/2021	Granted on the 10/03/2022
2360330	Kilkenny County Council	For the Proposed installation of a network connection and grid connection, and minor amendments to solar farms previously approved under planning application references 17/669 and 22/126. The proposed development will consist of the installation of a 33kV network connection between the solar farms approved under planning application references 17/669 and 22/126 comprising: c. 921m of overhead line and 9 No. wooden poles; onward connection of said approved solar farms to Ballyragget 38kV Substation by installation of a 38kV cable comprising c. 786m of underground cable and c. 395m of overhead line on 5 No. wooden poles; amendments to solar farm approved under planning reference 17/669 comprising removal of substation and replacement with solar panels;	21/07/2023	Granted on the 29/02/2024

		amendments to the layout of the substation approved under planning reference 22/126, and all associated site works.		
2460221	Kilkenny County Council	a 10-year planning permission and a 35-year operational life for an energy storage facility comprising (i) energy storage containers installed on concrete plinth foundations; (ii) electrical transformers; (iii) underground electrical and communications cabling; (iv) provision of a new access point from the R432; (v) on-site access track; (vi) security fencing and security gates; (vii) pole-mounted security cameras; (viii) ancillary electrical equipment and storage containers including a staging area; and, (ix) all associated and ancillary site development, drainage, landscaping and reinstatement works. This planning application is accompanied by a Natura Impact Statement.	17/05/2024	Granted on the 23/01/2025
2560144	Kilkenny County Council	For development at this site. The development will consist of: A 10-year planning permission and a 35-year operational life for (i) a compound (with a total footprint of approximately 1,080 square metres [m2]) with a hardcore surface enclosed by security fencing and gates; (ii) a 110kV electricity transformer and associated electrical plant and equipment; (iii) an electrical control building (with a total gross floor area of 64m^2) containing electrical plant and equipment; (iv) underground electrical cabling to connect the permitted Ballyragget Power Reserve (Kilkenny County Council Planning Register Reference 24/60221) to the electrical control building and to connect the 110kV electricity transformer to the existing Ballyragget 110kV electricity substation; and (v) all associated ancillary site development works. This planning application is accompanied by a Natura Impact Statement.	25/03/2025	Granted on the 15/05/2025
21627	Kilkenny County Council	For a ten-year appropriate period planning permission for development	22/07/2021	Granted on the 24/08/2022

		of this site; the proposed development will constitute the provision of the following: The installation of 31.49km of a 38kV underground electrical cabling and all other ancillary works including joint bays, culverts, maker posts and all associated development in the townlands of Killeen, Rathmacan, Gortnagap, Kyleballyoughter, Courtstown, Raheen, Lates, Curraghscarteen, Canvarstown, Trenchardstown, Lisnalea, Hillend, Coldharbour, Killahy, Greenhill, Lughinny, Craddockstown, Tubbrid Lower, Clomantagh Lower, Barna, Newtown, Kilrush, Belville, Lodge, Garranamanagh, Balleen Lower, Lodge, Tifeaghna (Browne), Lodge Demesne West, Lodge Demesne East, Clontubbrid, Clone, Acragar, Skinstown, Lisdowney, Seskin South, Parksgrove Ballyragget & Moatpark, Co. Kilkenny. Advisory Note: The full extent of the grid connection is 33.8km, and a separate planning application will be made for an underground grid connection to Tipperary County Council. The development comprises part of an overall development for which planning permission was granted for a 9 turbine wind farm and all associated works on lands located in the townlands of Farranroy Upper, Farranroy Lower, Coolnashinnagh & Gortnasmuttaun, Co. Tipperary. The planning application will be accompanied by an Environmental Impact Assessment Report (EIAR) and Natura Impact Statement.		
2360248	Kilkenny County Council	For an amendment to planning application previously granted under reference PL/21/627 in the townlands of Killeen, Rathmacan, Gortnagap Kyleballyoughter, Courtstown, Raheen, Lates, Curraghscarteen, Canvarstown, Trenchardstown, Lisnalea, Hillend, Coldharbour, Killahy, Greenhill, Lughinny, Craddockstown, Tubbrid Lower, Clomantagh Lower, Barna, Newtown, Kilrush, Belville, Lodge, Garranamanagh, Balleen Lower, Lodge, Tifeaghna (Browne), Lodge	12/06/2023	Granted on the 06/12/2023

		Demesne West, Lodge Demesne East, Clontubbrid, Clone, Acragar, Skinstown, Lisdowney, Seskin South, Parksgrove Ballyragget & Moatpark, Co Kilkenny. The previously consented planning application comprised the installation of 31.4 km of a 38kV underground grid connection comprising cable ducting and associated electrical cabling and all other ancillary works including joint bays, culverts, maker posts and all associated development. The proposed amendments to the previously consented grid connection comprise: • Increase in number of joint bays along the extent of the grid connection from a total of 35 to 45 joint bays • Grid connection to be operated at 38kV but installed to a 110kV underground cable design standards/infrastructure • Minor Adjustments to the route and red line boundary		
20516	Kilkenny County Council	For development at this site. The development will consist of A Packaging Intake Building, A Butter Despatch comprising two butter despatch docks, An extension of the existing roadside boundary wall, Alterations to the existing building elevations, Associated site works. The proposed development will result in improved site safety, operational efficiency and containment of material deliveries and butter despatch. The milk processing plant site holds an industrial emissions licence issued by the Environmental Protection Agency.	07/08/2020	Granted on the 02/11/2020
An Coimisiún Pleanála				
ACP Ref: 308824	An Coimisiún Pleanála	N77 Ballyragget Village to Ballynaslee Road Improvement Scheme	03/12/2020	Granted
ACP Ref: 316132	Kilkenny County Council	The proposed development will consist of: Construction of two anaerobic digesters, one equalization tank to include concrete base, earth	Received to the Planning Authority- 20/10/2022	Granted on the 25/02/2025

PA Ref: 22687		embankment and associated works; construction of biogas storage dome with biogas flare, desulfurization unit; construction of membrane and control building with yard slab and link road; construction of ferric chloride storage tank; installation of a new pipeline with underground and overground sections for the purpose of conveying renewable biogas to the Glanbia facility east of the N77 road; realignment of the existing internal road to facilitate vehicle movements; drainage works and all associated site works including landscaping. The dismantling and removal of an existing disused sludge mixing tank; dismantling and removal of an existing biotower. This facility holds an industrial emissions licence issued by the Environmental Protection Agency. A Natura Impact Statement (NIS) will accompany this application	21/03/2023- Planning Appeal Lodged	
ACP Ref: 322154 PA Ref: 2560003	Kilkenny County Council	For a period of 10 years for a development at this site situated in the townlands of Acragar, Ballyconra, Ballycuddihy, Ballyroe, Ballyroe (Grace), Ballyroe (Maher), Baunaniska, Boherkyle, Briskalagh, Brittas, Clone, Coolnapisha, Curraghduff, Freshford, Freshford Lots, Graigueswood, Grange, Huntstown, Kilmanagh, Knockeenglass, Knockown, Moatpark, Monabrika, Monavadaroe, Moneenaun, Oldtown, Oldtownhill, Parksgrove, Picketstown, Rathealy, Sart, Sweethill, Tobernapeastia, Tullaroan, Upperwood Demesne, Co. Kilkenny. The development will consist of the provision of the following: i. 7 no. wind turbines with an overall turbine tip height of 185 metres; a rotor blade diameter of 163 metres; and hub height of 103.5 metres, and associated foundations and hard-standing areas; ii. A permanent 38kV substation compound (control building with welfare facilities, all associated electrical plant and apparatus, security fencing, underground cabling, storage containers, wastewater holding tank, site drainage and all ancillary works); iii.	Received to the Planning Authority- 03/01/2025 Planning Appeal Lodged- 26/03/2025	Live Case- Appealed

		Permanent underground electrical (38kV) and communications cabling to the existing Ballyragget 110kV substation in the townland of Moatpark (including joint bays, communication and earth sheath link chambers and all ancillary works along the route). This cabling route is primarily located within the public road corridor which includes a Protected Structure (Kilkenny RPS Ref. C886); iv. Underground electrical (33kV) and communications cabling connecting the wind turbines and meteorological mast to the on-site substation; v. 3 no. temporary construction compounds (including site offices and welfare facilities); A meteorological mast with a height of 30 metres, security fencing and associated foundation and hard standng area; vii. A new temporary site entrance on the L1009; viii. A new gated site entrance on the L5024; ix. Upgrade of existing site tracks/ roads and provision of new site access roads, junctions and hardstand areas; x. A borrow pit; xi. Spoil Management; xii. Tree felling and hedgerow removal; xiii. Biodiversity Management and Enhancement Plan measures (including establishment of a riparian buffer and hedgerow enhancement); xiv. Site Drainage; xv. Operational Stage site signage; and xvi. All ancillary works and apparatus. A thirty five-year operational life from the date of full commissioning of the wind turbines and subsequent decommissioning of the wind turbines is being sought. An Environmental Impact Assessment Report and Natura Impact Statement has been prepared in respect of the proposed development and accompany this application.		

2.6.2 Wind Energy Developments within 25km

A planning search was carried out to establish proposed, permitted and operational wind farms within 25km of the Proposed Wind Farm. The search was carried out using the relevant local authority planning portals in June 2025 for relevant planning applications. In total, 21 no. wind energy developments within 25km were identified:

Table 2-3: Wind Farm developments within 25km

Pl. Ref.	Applicant	County	Wind Farm	Description	Decision	Status	No. of Turbines	Appropriate Distance to Nearest Turbine (km)The
PA Ref: 081511, PA Ref: 12172	Lisdowney Wind Farm Ltd	Kilkenny	Lisdowney Wind Farm	For development which will consist of 4 wind turbines with service roadways, electrical control and transformer compound and anemometer. The application is accompanied by an Environmental Impact Statement	Granted	Existing	4	c.4.2km
ACP Ref: 322069	Rowanmere Limited	Kilkenny	Ballynalackan Wind Farm	The Ballynalacken Windfarm Project is a proposal for a twelve-turbine windfarm on the Castlecomer Plateau, between the towns of Ballyragget and Castlecomer in north Kilkenny and just south of the County Laois border at Ballinakill. The entire Ballynalacken Windfarm	Proposed	Proposed	12	c. 5.7km

				Project is located in County Kilkenny.				
PA Ref: 16/260 ACP Ref: 248518	Pinewood Wind Limited	Laois/ Kilkenny	Pinewoods Wind Farm	11 wind turbines, electricity substation, switch room, equipment compound, site access tracks, 7 site entrances, meteorological mast, upgrade of road junction.	Granted	Permitted	11	c9.9km
PA Ref: 13/268 ACP Ref: 242626	Coillte Teoranta	Laois	Cullenagh Wind Farm	18 wind turbines, internal access roads, 1 meteorological mast, substation compound, 6 parking spaces, widening of 2 entrances for temporary construction access.	Granted	Permitted	18	c.14.4km
KCC PA Ref: 14/202), **LCC PA Ref: 14/109**	SWS Energy Limited	Kilkenny/ Laois /Tipperary	Lisheen 3 Wind Farm	KCC- The development will consist of 6 no. wind turbines, to a maximum tip height of 156m; Associated hardstandings at each turbine location Laois CC- The Development will consist of 2 no. wind turbines	Granted	Existing	8	c.16.8km
ACP Ref: 317809	Coolglass Windfarm Limited	Laois	Coolglass Wind Farm	Proposed Coolglass windfarm, consists of 13 no. turbines and related works	Granted, at Judicial Review	Proposed	13	c.17.6km

PA Ref: 2560003 **ACP Ref: 322154**	Briskalagh Ltd	Kilkenny	Briskalagh Wind Farm	For a period of 10 years for a development at the site. The development will consist of the provision of 7 no. wind turbines , and all ancillary works and apparatus. An Environmental Impact Assessment Report and Natura Impact Statement has been prepared in respect of the proposed development and accompany this application.	Appealed	Proposed	7	c. 17.9km
PA Ref: 12/533; **PA Ref: 14515**	Ballybay Wind Farm Limited	Kilkenny	Ballybay Wind Farm	The development consists of a windfarm, in the townslands of Boggan and Ballybeagh, Tullaroan, Co. Kilkenny, comprising of six turbines with a hub height of 74.5m and a maximum blade tip height of 110m, together with a borrow pit, 80m permanent metrological mast and associated access roads and site works. This will replace a previous permission for a windfarm granted under Planning ref no. 02/1072 which was extended under 08/735 and subsequently under 12/194 for five turbines, four turbines with a hub height of 60m and maximum blade tip height of 93m and one turbine with a hub	Granted	Existing	6	c.18.2km

				height 49m and maximum blade tip height of 82m, on a site at Ballybeagh, Tullaroan, Co. Kilkenny. An appropriate period of 10 years (duration of the planning permission to construct the development) is sought, with an operational life of 25 years after the date of commissioning. An Environmental Impact Statement (EIS) and Natura Impact Statement (NIS) accompany this application. Development				
KCC PA Ref: 10145 **LCC PA Ref: 10129** **TCC PA Ref: 10510118**	Bord na Mona Energy Limited	Kilkenny/ Laois/ Tipperary	Brukana Wind Farm	Kilkenny Description: The development will consist of eight wind turbines of up to 100m hub height and up to 112m rotor diameter with a total height not exceeding 156m; a transformer and crane hardstand area at each turbine; under-ground electrical and communication cables linking the turbines; internal site tracks, the upgrading of existing access tracks; drainage works; a 38kV substation with associated equipment and control building with associated septic tank and treatment system; a section of the	Granted	Existing	14	c.18.8km

				proposed 38kV overhead power line from the proposed 38kV substation in Bruckana to the 110kV Lisheen substation; a permanent meteorological lattice mast 100m high; and associated works. Laois Description: Erect 4 wind turbines of up to 100m hub height and up to 112m rotor diameter with a total height not exceeding 156m; a transformer and crane hardstand area at each turbine; underground electrical and communications cables linking the turbines; internal site tracks; drainage works and associated works. This development is part of a larger development which also extends to parts of Co. Kilkenny and North Tipperary. Tipperary Description four wind turbines of up to 100m hub height and up to 112m rotor diameter with a total height not exceeding 156m; a transformer and crane hardstand area at each turbine; underground electrical				

				and communication cables linking the turbines; internal site tracks; drainage works; a section of the proposed 38kV overhead power line from the proposed 38kV substation in Bruckana to the 110kV Lisheen substation; and associated works.				
PA Ref: 16/17, **PA Ref: 23/81** **PA Ref: 16/666,** **PA Ref: 24/33**	Art Generation	Kilkenny	Foyle Wind Farn Extension	For one wind turbine with a hub height up to 80m and a maximum blade tip height up to 121m, underground cabling, together with associated access road (337m) and site works. And for 2 No. wind turbines with a hub height up to 80m and a maximum blade tip height up to 121m, A grid control building, underground cabling, borrow pit, together with associated access roads and site works.	Granted	Existing	3	c.18.9km
PA Ref: 05/1256; **PA Ref: 12378**	Art Generation	Kilkenny	Foyle Wind Farm	For a windfarm comprising of four turbines with a hub height of 80m and a maximum blade tip height of 121m, together with an electrical transformer plant, control housing, borrow pit, metrological mast and associated access roads and site works.	Granted	Existing	4	c.19.3km

ACP Ref: 315365	White Hill Wind Limited	Carlow/ Kilkenny	White Hill Wind Farm	Wind energy development consisting of 7 no. wind turbines and all associated works.	Granted at Judicial Review	Proposed	7	c.19.3km
PA Ref: 09/781 **ACP Ref :237713**	Cnoc Windfarms Ltd.	Tipperary	An Cnoc Wind Farm	5 no. wind turbines, site tracks, hard standing areas, anemometry mast, small control building underground cabling, site signage, temporary site works and ancillary works; an Environmental Impact Statement has been submitted with application	Granted	Existing	5	c.20.1km
ACP Ref: 317589	EDF Renewables Energy Ltd	Kilkenny	Freneystown Wind Farm	Proposed Renewable Energy Development of 8 wind turbines and all associated works	Pre App	Proposed	8	c. 20.3km
PA Ref: 04/935 **PA Ref: 09237**	Eco Developments Ltd	Laois	Gortahile Wind Farm	Erect 7 no. wind turbines, up to 80m hub height & up to 45m blade length, access roads, control building & ancillary site works and the erection of 1 wind turbine up to 80m hub height and up to 45m blade length, access road and associated works. This application is an extension to the already permitted 7 turbines at Gortahile and Ardough, Co.Laois (04/935).	Granted	Existing	8	c.20.6km

				This application will be accompanied by an EIS.				
PA Ref: 6510773/ **ACP Ref 222142** **PA Ref: 09510100**	Anglo American Lisheen Mining Limited	Tipperary	Lisheen 1 & 2 Wind Farm	Application to ACP: Wind turbine farm consisting of 22 no. wind turbine generators, access roads, craneage pads and associated infrastructure. Barnalisheen, Cooleeny, Application to TCC: 12 no wind turbines (hub height 95m, blade diameter 90m), with an overall height from ground to blade tip of 140m, the use of 3 no. new borrow pits, construction of internal site tracks, upgrade of existng access track and associated works as an extension to Lisheen Wind Farm (Pl Ref no 06/51/0773, ACP Ref PL22.222142). An EIS has been submitted with this application.	Granted	Existing	30	c.20.6km
PA Ref: 11154/ **ACP Ref 240245**	Kilcarrig Quarries trading as Kilcarrig Renewable Energy	Carlow	Bilbao Wind Farm	The erection of five wind turbines (maximum hub height 90m, maximum blade diameter 93m), one permanent meteorological mast, access road and internal site tracks, electricity	Granted	Permitted	5	c.21.7km

				sub-station, underground cabling and all associated site works. An Environmental Impact Statement (EIS) has been prepared in respect of the proposed development and will accompany the planning application				
PA Ref: 2460122 **ACP Ref: 320354**	EDF Renewables Ireland Limited	Carlow	Seskin Wind Farm	Permission for the construction of 7 wind turbines and all associated works. A 10 year planning permission and 35 year operational life of the wind farm from the date of commissioning is sought. Environmental Impact Assessment Report and Natura Impact Statement submitted with application.	Appealed	Proposed	7	c. 21.9km
PA Ref: 20/972, PA Ref: 23/60803	Gromane Limited	Tipperary	Farranroy Wind Farm	A ten year planning permission for a renewable energy development with a 40-year operational life (from the date of commissioning of the renewable energy development). The entirety of the development constitutes the provision of a 9-turbine wind farm and all associated works on lands in both Counties Tipperary and Kilkenny.	Granted	Permitted	9	c.22.8km

PA Ref: 09/801	Gurteen Wind Farm Ltd	Tipperary	Gurteen Lower Wind Turbine	1 no. wind turbine, site tracks, hard standing areas, anemometry mast, small control building and compound, underground cabling, temporary site works and ancillary works.	Granted	Existing	1	c.24.2km
PA Ref: 09/51/0084/ **PA Ref: 11510203** **PA Ref: 12510174**	Monaincha Wind Farm Ltd	Tipperary	Monaincha Wind Farm	10 no. wind turbine generators of hub height 80m; (b) Electrical substation & switch station; (c) Proprietary treatment unit & waste water holding tank; (d) Access tracks & buried cable ducts; (e) All associated site works & miscellaneous landscaping & enabling works. It should be noted that an Environmental Impact Statement is submited with this application And for a modification to Planning Ref. 09/51/0084 (Monaincha Wind Farm) and an amendment to assoicated Planning Conditions. The primary modification is an increase in turbine tip height from 125m to 156m. As a result of this modification there will also be minor (micrositing) changes in the location of 5 no. turbines and associated revisions	Granted	Existing	15	c. 24.7km

				to the supporting civil infrastructure design, including the provision of a borrow pit. An environmental impact statement accompanies this application. For an extension to Monaincha Wind Farm (Planning Ref 11/51/0203). The extension will comprise of 5 No. turbines with a tip height of up to 156m and associated access tracks and site works. An Environmental Impact Statement and Natura Impact Statement				

2.7 Scoping and Consultation

2.7.1 Scoping

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

A scoping report, providing details of the Proposed Development, was prepared by MKO and circulated in May 2024. MKO requested the comments of the relevant personnel/bodies in their respective capacities as consultees with regards to the EIAR process. As part of the constraints mapping process, which is detailed in Section 3.2.5.2.1 of Chapter 3 of this EIAR, telecommunications operators were contacted in April 2023 in order to determine the presence of telecommunications links either traversing or in close proximity to the Wind Farm Site.

2.7.2 Scoping Responses

Tables 2-4 and 2-5 list the responses received to the scoping document circulated. Telecommunications operators were scoped at an earlier stage for the purposes of constraints mapping. Copies of all scoping responses received as of May 2024 are included in Appendix 2-1 of this EIAR. The recommendations of the consultees have informed the scope of the assessments undertaken and the contents of the EIAR. Those bodies engaged with at scoping stage are set out below in Table 1-6 and 1-7.

Table 2-4: Scoping List and Responses

Ref	Consultee	Date of Response
1	An Taisce	No Response
2	Bat Conservation Ireland	15/05/2024
3	BirdWatch Ireland	No Response
4	Commission for Regulation of Utilities, Water and Energy	No Response
5	Department of Agriculture, Food and the Marine	No Response
6	Department of Defence	03/05/2024 23/05/2024
7	Department of Housing, Local Government and Heritage	24/06/2024
8	Department of the Environment, Climate and Communications	31/05/2024
9	Department of Tourism, Culture, Arts, Gaeltacht Sport, and Media	No Response
10	Department of Transport	28/05/2024
11	Environmental Protection Agency	No Response
12	Failte Ireland	10/05/2024
13	Forest Service	10/06/2024
14	Geological Survey of Ireland	31/05/2024
15	Health Service Executive	09/07/2024
16	Iarnród Éireann	08/05/2024
17	Inland Fisheries Ireland	17/05/2024
18	Irish Raptor Study Group	No Response
19	Irish Red Grouse Association	No Response

Ref	Consultee	Date of Response
20	Irish Wildlife Trust	No Response
21	Kilkenny Airport	No Response
22	Kilkenny County Council (Planning Dept.)	No Response
23	Kilkenny County Council (Environment Dept.)	No Response
24	Kilkenny County Council (Roads & Transport Dept.)	No Response
25	Kilkenny County Council (Heritage Officer)	No Response
26	Laois County Council (Planning Dept.)	No Response
27	Laois County Council (Environment Dept.)	No Response
28	Laois County Council (Roads & Transport Dept.)	No Response
29	Laois County Council (Heritage Officer)	No Response
30	Eastern and Midland Regional Assembly	08/07/2024
31	Office of Public Works	No Response
32	Seskin Lisdowney Ballyconra Group Water scheme (Private)	No Response
33	Southern Regional Assembly	No Response
34	Sports Ireland (formerly Irish Sports Council)	No Response
35	Sustainable Energy Authority of Ireland	No Response
36	The Heritage Council	No Response
37	Transport Infrastructure Ireland	27/05/2024
38	Uisce Éireann	06/06/2024
39	Waterways Ireland	03/05/2023

Table 2-5 sets out the detail of Telecommunication consultation responses received. The responses received were fully considered and issues raised where followed up through contact with the respondent where clarification was necessary and addressed throughout the EIAR.

Table 2-5: Telecommunications Scoping and Responses

Ref	Consultee	Date of Response
1	2rn (RTÉ Transmission Network Ltd.)	03/05/2024
2	Airwave Internet	13/04/2023
3	Broadcasting Authority of Ireland	11/04/2023
4	Coimisiún na Meán	02/05/2024
5	Cellnex	21/04/2023
6	Dense air	No Response
7	Eir	25/04/2023
8	Electricity Supply Board	No Response
9	Enet Telecommunications Networks Limited	11/07/2023
10	EOBO Ltd	No Response
11	FastCom Broadband Limited	No Response
12	Hibernian towers	20/04/2023
13	Imagine Networks Services	20/04/2023
14	Irish Rail	13/04/2023
15	Irish Water	No Response
16	Ivertec Ltd	20/04/2023
17	JFK Communications Ltd	No Response
18	JS Whizzy Internet Limited	11/04/2024
19	Lackabeha Services Ltd T/A Airwaves Internet	13/04/2024
20	Meteor Mobile Communications Limited	No Response
21	RTÉ/Saorview	No Response
22	TETRA Ireland	24/04/2023
23	The Irish Aviation Authority	05/06/2024
24	Three Ireland (Hutchison) Ltd	11/04/2023
25	Towercom	No Response
26	Viatel Ireland Ltd	No Response

27	Virgin media	No Response
28	Vodafone	21/04/2023

Table 2-6 below provides a summary of the details received from the consultees. The table also identifies the relevant chapter where the points raised by each of the consultees are addressed.

Table 2-6: Consultee responses and relevant chapters

Consultee	Points Raised by Consultee	Addressed in Chapter
Department of Housing, Local Government and Heritage	**Archaeology** 1. The Archaeological, Architectural and Cultural Heritage Assessment should include an assessment of the possible effects of the proposal on the wider archaeological landscape. 2. The Department advises that the AACHA should incorporate a robust desk-study supported by a comprehensive field inspection as well as a visual impact assessment (to assist in identifying any possible impacts to the setting of sites or monuments) 3. Negative visual impact on monuments and may diminish or interrupt alignment views and alter key aspects of their original function and layout	Chapter 13 Archaeological, Architectural and Cultural Heritage
Department of Agriculture, Food, and the Marine	4. The developer must obtain a Felling License from The Department for Agriculture, Food, and the Marine before trees are felled or removed. 5. The developer should take note of the contents of Felling and Reforestation Policy document which provide a consolidated source of information on the legal and regulatory framework relating to tree felling.	Chapter 6 Biodiversity
Department of Defence	6. Turbines should be illuminated by Type C, Medium intensity, Fixed Red obstacle lighting with a minimum output of 2,000 candela to be visible in all directions of azimuth and be operational 24/7. Obstacle lighting should be incandescent or of a type visible to Night vision equipment. Obstacle lighting must emit light at the near Infra-Red (IR) range of the electromagnetic spectrum, specifically at or near 850 nanometres (nm) of wavelength. Light intensity to be of similar value to that emitted in the visible spectrum of light.	Chapter 15 Material Assets
Department of Transport	7. Proposing the placement of cables within the public road network, the developer should consider: *Potential restrictions on the Road Authority in carrying out its function to construction and maintain a public road and the additional costs of such works.* *Potential impact on the stability of the road with particular emphasis on a 'legacy road' where the design should take into account variable conditions.* *The possible effect on the remaining available road space.* *The necessity of the Road Authority to have the power in the cables to be turned off in order to construct and maintain the public road.*	Chapter 3 Consideration of Reasonable Alternatives Chapter 15 Material Assets

	› The Department consider it important that the examination of the proposal should include consideration of the following: 1. *Examination of options other than cables within the road.* 2. *Examination of connecting to the national grid at a substation closer to the wind farm.* 3. *Details of where in the road cross section cables are to be placed.* 4. *Details of any chambers proposed within the public road cross section.* 5. *The elimination of joint bays and use of temporary removable jointing bays to protect the integrity of the road.* 6. *Prevention of the attachment of cables to all bridge structures and culverts by diverting them beneath or away from these structures* 7. *Rationalisation of the no. of cables involved and their division within the trench.* 8. The Department considers the following should be considered when applying conditions to any approval. 1. *A condition requiring the local authority approval of the final route of cables through the public roads. If, during construction, there was a need to deviate from the detailed design then the approval of the local authority would again be sought.* 2. *A condition requiring the developer to comply with all appropriate standards and, inter alia the Guidelines for Managing Openings in Public Roads 2017.* 3. *A condition requiring that the location of the cables would be recorded as exactly as possible.* 4. *A condition to require the elimination of jointing bays* 5. *A condition requiring the developer to route cables away from bridge structures and specifically preventing the developer from aaching cables to road bridges.* 6. *A condition requiring the replacement of culverts that have been excavated during the cable duct placement operation* 7. *Roads Authority of the owner of the cables (Owner) and the controller (Power Controller) of the power transmitted along the cables.*	
ENET Telecommunications Networks Limited	› Proximity of the Proposed Development to a telecommunication link	Chapter 15 Material Assets
Fáilte Ireland	› To assess the impact of the Proposed Development on tourism assets.	Chapter 5 Population and Human Health

		Chapter 14 Landscape and Visual
Geological Survey of Ireland	**Geoheritage** › GSI records show that there are no County Geological Sites in the vicinity of the proposed wind farm study EIAR study boundary. Groundwater 9. Given the nearby drinking water sources (Public Water Scheme, Group Water Scheme), the effects of any potential contamination as a result of the project would need to be assessed. Geohazards › Use of the GSI data on landslides, flooding and coastal erosion for the Flood Risk Assessment and other management plans. Natural Resources › Use of the GSI data on aggregate potential to identify areas of High to Very High source aggregate potential within the area. Geochemistry › Use of available geochemistry data to assess the chemical status of soil and water at a regional scale and to support the assessment of existing or potential impacts on human activity on environmental chemical quality.	Chapter 8 Land, Soils and Geology Chapter 9 Water
Health Service Executive	**Public Consultation** 1. It is recommended that early and meaningful public consultation with the local community is undertaken to ensure all potentially significant impacts of the Proposed Development have been assessed adequately. 2. To assist with the consultation and planning process it is recommended that the applicant develops a dedicated website for the Proposed Development and all correspondence, maps, project updates and documentation including the EIAR should be uploaded. Decommissioning	Chapter 1 Introduction Chapter 3 Consideration of Reasonable Alternatives Chapter 4 Description of the Proposed Development Chapter 5 Population and Human Health

	› The EIAR should detail the eventual fate of the turbines and associated material. 3. The EIAR should indicate the proposed future use of the development site at the end of the planning permission period. Siting, Location & details of Turbines › The EIAR should include a map and description of the proposed location of each turbine. 4. The Environmental Health Service expects that details of the turbines to be installed will be available at the time of panning permission is sought and will be included in the EIAR. 5. Details of the foundations for the wind turbines including depth, quantity, and material to be sued should be included in the EIAR. Assessment of Consideration of Alternatives › The EIAR should consider an assessment of alternatives. Noise and Vibration › A baseline noise monitoring survey should be undertaken to establish the existing background noise levels. › An assessment of the predicted noise impacts during the construction phase and the operational phase of the Proposed Development must be undertaken. Shadow Flicker › It is recommended that a shadow flicker assessment is undertaken to identify any dwellings and sensitive receptors which may be impacted by shadow flicker. The assessment must include all proposed mitigation measures. › It is recommended that turbine selection will be based on the most advanced available technology that permits shut down during times when residents are exposed to shadow flicker.	Chapter 8 Land, Soils and Geology Chapter 9 Water Chapter 10 Air Quality Chapter 12 Noise and Vibration Appendix 4-2Construction and Environmental Management Plan Appendix 4-4 Decommissioning Plan

Air Quality

6. A Construction Environmental Management Plan should be included in the EIAR which details dust control and mitigation measures.

Surface and Ground Water Quality

7. The proposed development has the potential to have a significant impact on the quality of both surface and ground water. The Environmental Health Service recommends that a walk over survey of the site is undertaken in addition to a desktop analysis of Geological Survey of Ireland data in order to identify the location of private wells used for drinking water purposes.
8. Any potential significant impacts to drinking water sources should be assessed. Details of bedrock, overburden, vulnerability, groundwater flows, aquifers and catchment areas should be considered when assessing potential impacts and any proposed mitigation measures.
9. Any impacts on surface water as a result of the construction of the underground cables should be identified and addressed in the EIAR.

Geotechnical and Peat Stability Assessment

- A detailed assessment of the current ground stability of the site for the proposed renewable energy development and all proposed mitigation measures should be detailed in the EIAR.
- An accurate assessment of the potential impacts of the foundations on water quality and peat stability cannot be undertaken without this information.

Ancillary Facilities

- The EIAR should include details of the location of all site office, construction compound, fuel storage depot, sanitary accommodation and canteen, First Aid facilities, disposal of wastewater and the provision of a potable water supply to the site canteen.

Cumulative Impacts

- All existing or proposed wind farm developments in the vicinity should be clearly identified in the EIAR.
- The impact on sensitive receptors of the proposed development combined with any other wind farm/renewable energy

	developments in the vicinity should be considered. The EIAR should include a detailed assessment of any likely significant cumulative impacts of the proposed renewable energy development.	
Inland Fisheries Ireland	› Inland Fisheries Ireland(IFI)is the statutory authority tasked under section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) with responsibility for the protection, management, and conservation of the inland fisheries resource. I n respect of the proposed wind farm and grid connection route, IFI wish to make the following observations: The proposed development is located predominantly in the catchment areas of the surface water bodies listed below. All a re a part of or have direct hydrological connections with the Barrow–Nore SAC. Article 5 of the Surface Water Regulations (SI 272 of 2009, as amended) states that there should be no deterioration in Ecological Status of surface water bodies. Article 28(2) of the Regulations states that a surface water body whose status is determined to be less than Good shall be restored to at least Good status. The proposed surveys / reports must demonstrate how this project would cause no deterioration to the above surface water bodies and is consistent with their restoration or maintenance at Good Ecological Status of better. IFI requests that the following assessments be provided: › Baseline ecological assessments of water courses potentially affected by the proposed development, including fish species as well as other biological and physico-chemical surveys › Maps of all aquatic habitats potentially affected by the project, including all drainage channels (temporary and permanent) potentially impacted by the proposed development › An assessment of the potential adverse effects of the proposed works on all relevant aquatic receptors, including fish. Assessments should cover area of the proposed development and the potential upstream and downstream impacts › An assessment of the cumulative effects of the proposed development along with other existing or approved projects › An assessment of the impact on the conservation objectives of species listed as qualifying interests in the Barrow–Nore SAC, which includes Lamprey species and Atlantic Salmon › The proposed mitigation measures to prevent erosion from soil disturbance in excavation areas and areas where there is significant movement of plant and machinery	Chapter 6 Biodiversity Chapter 8 Land, Soils and Geology Chapter 9 Water Appendix 4-2 Construction and Environmental Management Plan Appendix 4-3 Surface Water Management Plan

	▸ Among the sources which may be used for fish ecological status and data are the Water Framework Directive Fish Ecological Status 2008-2021 fish survey resultshttp://wfdfish.ie/ and https://opendata-ifigis.hub.arcgis.com/datasets/IFIgis::water-framework-directive-fish-ecological-status-2008-2021.This layer shows WFD fish ecological status for river site locations from2008to2021. Fish species present at each site is also indicated. MKO may also complete a data request form for specific fish survey data from our research department if required. ▸ During the construction and operational phases, the applicant should adhere to the recommendations and guidelines outlined in IFI's Guidelines on Protection of Fisheries during Construction Works in and adjacent to Waters2016. A copy of this document is available here. ▸ Existing watercourse crossings for the proposed grid connection route should be utilised where possible. Crossings must be accompanied by a site-specific method statement provided to IFI. The applicant should provide these at least ten working days before works commence. Written approval from IFI should be obtained before works proceed. ▸ Where existing water crossings must undergo alteration, IFI request that crossings are upgraded in the interests of habitat improvement and biodiversity enhancement. Crossings must satisfy IFI's Fisheries Construction Guidelines referred to above. IFI also recommends that the applicant refer to the OPW's Design Guidance For Fish Passage On Small Barriers(2021). IFI should be consulted at the design stage for any new crossings or alterations to existing crossings. ▸ The storage, management and conveyance of materials must not permit any deleterious matter to reach surface water systems either directly or indirectly. Watercourses must be maintained in their original state, their bankside vegetation preserved, and the existing line of the watercourse left unaltered. There should be no interference with the bed, gradient, profile or alignment of watercourses without the prior notification and the agreement of Inland Fisheries Ireland. Instream works may only take place during the period 1 July to 30 September. ▸ SuDS principles should be incorporated into surface water management plans to attenuate any run-off of suspended solids or other deleterious matter. Natural flow paths should not be interrupted or diverted in a manner that would	

	increase the risk of erosion. Drainage infrastructure should be installed during dry ground conditions. › Before works commence the applicant or the appointed contractor should appoint a suitably qualified person to oversee and implement environmental mitigation measures. Contact details should be provided to Inland Fisheries Ireland. In the event of an environmental incident which threatens an aquatic zone IFI must be informed immediately at the contact details below. › At all times the precautionary principle should be applied throughout the development. Records should be kept of biological and chemical monitoring undertaken before and during the construction phase and operational phase for the development. Records should also be kept of inspections of surface water mitigation measures. These records should be made available upon request to any authorised person as defined under the Local Government (Water Pollution) Acts. › Future correspondence or any requests for clarification can be sent via email to cormac.goulding@fisheriesireland.ieor by post to the address below.	
Transport Infrastructure Ireland	Where the developer proposes the placement of any cables (or additional cables) in one or more trenches within the extents of the (regional and local) public road network, it is necessary to consider the following: 1. Their presence within the public road will likely significantly restrict the Road Authority in carrying out its function to construct and maintain the public road and will likely add to the costs of those works post construction. 2. Their installation within the lands associated with the public road may affect the stability of the road. In particular where the road is a “legacy road” (where there is no designed road structure, and the subgrade may be poor or poorly drained) the design needs to take account of all the variable ground conditions and not be based on a sample of the general soil conditions. 3. The possible effect on the remaining available road space (noting that there may be need to accommodate other utilities within the road cross-section in the future). 4. The necessity to have the power in the cables switched off where the Road Authority considers this necessary in order to carry out its function to construct and maintain the public road. The Department consider it important that the examination of the proposal should include consideration of the following: 5. Examination of all available technologies (including both Overhead Line (OHL) and Underground Cable (UGC) options or combinations of both) and route	Chapter 12 Noise and Vibration Chapter 14 Landscape and Visual Chapter 15 Material Assets Appendix 15-2 Traffic Management Plan

	options other than the routing of cables along the public road, 6. Examination of options for connection to the national grid network at a point closer to the wind farm in order to reduce the adverse impact on public roads, 7. Details of where within the road cross section cables are to be placed so as to minimise the effect on the Roads Authority in its role of construction and maintenance, 8. Examination of details of any chambers proposed within the public road cross section so as to minimise the effect on the Roads Authority in its role of construction and maintenance, 9. Elimination of permanent jointing bays from beneath the road pavement to protect the integrity of the road structure for the safety of those driving on the public road by eliminating hard spots and also preserve the road width for other utilities, 10. Prevention of the attachment of cables to all bridge structures and culverts by diverting them beneath or away from these structures and, 11. Rationalisation of the number of cables involved (including existing electric or possible future cables) and their diversion into one trench, in order to minimise the impacts on the road network and the environment along the road boundary (hedgerows).	
Uisce Éireann	Having reviewed the documentation submitted Uisce Eireann strongly recommend the following items be addressed ahead of lodging a planning application for your proposal: 1. Confirmation of Feasibility for Diversion of UÉ assets To ensure protection of and access ton Uiscen Éireann water mains and sewer pipes located within the road reserve of the N77 and the R432and along the cabling route a Confirmation of Diversion Feasibility must be obtained from Uisce Éireann's Diversions team where the applicant cannot demonstrate separation distances as per UEs codes & practices can be achieved. 2. Proximity to Abstraction Points All potential impacts arising from the development proposal on Uisce Éireann's abstraction points must be identified and addressed in the EIAR and planning application. This includestheBallyraggetInfiltrationGalleryabstractionpoin tlocated approximately2kmto the south of the main turbine site, while the proposed cabling associated with the proposed wind farm is located within the Groundwater Catchments Zone of Contribution (ZOC) for the Ballyragget abstraction. Any other surface water or groundwater abstraction points where a potential hydrological and hydrogeological exists must also be identified and addressed in the EIAR and planning application. The EIAR must include and consider all direct, indirect and cumulative effects on the abstraction points and water sources and provide mitigations for	Chapter 9 Water Appendix 4-2 Construction and Environmental Management Plan Appendix 4-3 Surface Water Management Plan

same to ensure there is no impact to, nor deterioration of ground and surface water source(s) in the area.

3. Stormwater Run Off and Hydrocarbons
   The potential impacts arising from run off and hydrocarbon during construction, operational and decommissioning phases should be addressed to include mitigations against contaminants entering groundwater and surface waters via hydrological and hydrogeological pathways.

In addition to the specific items outlined above requiring clarification within the EIAR, the following aspects of Water Services should also be considered in the scope of an EIA where relevant;

- Where the development proposes the backfilling of materials, the applicant is required to include a waste sampling strategy to ensure the material is inert.
- Mitigations should be proposed for any potential negative impacts on any water source(s) which may be in proximity and included in the environmental management plan and incident response.
- Any and all potential impacts on the nearby public water supply water source(s)are assessed, including any impact on hydrogeology and any groundwater/surface water interactions.
- Impacts of the development on the capacity of water services (i.e. do existing water services have the capacity to cater for the new development). This is confirmed by Uisce Éireann in the form of a Confirmation of Feasibility (COF). Ifa development requires a connection to either a public water supply or sewage collection system, the developer is advised to submit a Pre-Connection Enquiry(PCE)enquiry to Uisce Éireann to determine the feasibility of connection to the Uisce Éireann network.
- The applicant shall identify any upgrading of water services infrastructure that would be required to accommodate the proposed development.
- In relation toa development that would discharge trade effluent–any upstream treatment or attenuation of discharges required prior to discharging to an UisceÉireann collection network.
- In relation to the management of surface water; the potential impact of surface water discharges to combined sewer networks and potential measures to minimize and or / stop surface waters from combined sewers.
- Any physical impact on Uisce Éireann assets–reservoir, drinking water source, treatment

	works, pipes, pumping stations, discharges outfalls etc. including any relocation of assets. › When considering a development proposal, the applicant is advised to determine the location of public water services assets, possible connection points from the applicant's site / lands to the public network and any drinking water abstraction catchments to ensure these are included and fully assessed in any pre-planning proposals. Details, where known, can be obtained by emailing an Ordnance Survey map identifying the proposed location of the applicant's intended › development todatarequests@water.ie › Other indicators or methodologies for identifying infrastructure located within the applicant's lands are the presence of registered wayleave agreements, visible manholes, vent stacks, valve chambers, marker posts etc. within the proposed site. › Any potential impacts on the assimilative capacity of receiving waters in relation to Uisce Éireann discharge outfalls including changes in dispersion / circulation characterises. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified within the report. › Any potential impact on the contributing catchment of water sources either in terms of water abstraction for the development (and resultant potential impact on the capacity of the source) or the potential of the development to influence /present a risk to the quality of the water abstracted by Uisce Éireann for public supply should be identified within the report. › Where a development proposes to connect to an Uisce Éireann network and that network either abstracts water from or discharges wastewater to a "protected"/sensitive area, consideration as to whether the integrity of the site / conservation objectives of the site would be compromised should be identified within the report. › Uisce Éireann does not permit building over of its assets. As an applicant you are required to; › -survey the site to determine the exact location of the assets. Any trial investigations should be carried out with the agreement and in the presence of Uisce Éireann. › -Provide evidence of separation distances between the existing Uisce Éireann assets and proposed structures, other services, trees, etc. have to be in accordance with the Irish Water Codes of Practice and Standard Details. › Where a diversion of Public Infrastructure may be required subject to layout proposal of the	

	development and separation distances, the applicant is required to submit a Diversions Enquiry to diversions@water.ie › Mitigation measures in relation to any of the above ensuring a zero risk to any Uisce Éireann drinking water sources (Surface and Ground water). This is not an exhaustive list. Please note; › Where connection(s) to the public network is required as part of the development proposal, applicants are advised to complete the Pre-Connection Enquiry process and have received a Confirmation of Feasibility letter from Uisce Éireann ahead of any planning application. › Uisce Éireann will not accept new surface water discharges to combined sewer networks.	
Vodafone	4. Proximity of the Proposed Development to a telecommunication link	Chapter 15 Material Assets

2.8 Other Consultations

2.8.1 Community Engagement

Prior to the lodgement of this application, the application engaged with the surrounding community regarding the Proposed Development. Initial consultation commenced in September 2024 and involved correspondence with local elected representatives and door-to-door correspondence with residents within 1.5km of the Proposed Development. This extended to include local businesses, community groups and sporting organisations. The Public Consultation Event was held on the 9th April 2025 in the Castle Arms Hotel, Durrow, Co. Laois, this event provided the public with updates on the Proposed Development and allowed the public to ask queries in relation to the development, to the developer and environmental consultants working on the project. A project website was created in September 2024 and has the most up to date information regarding the project and it hosts a 'Virtual Room' which is viewable to the public, this website also went live on the 9th April 2025. Follow up letters were also sent to residents within 1.5km of the Proposed Development to address the main concerns raised during the community consultation.

The main concerns address in the letter include:

- The proximity of the proposed wind turbines to residential properties
- Shadow Flicker and Noise generated by the proposed wind turbines
- The visibility of the proposed wind turbines from residential dwellings and surrounding area
- The potential effect of the proposed development on house prices
- The potential effects of the proposed development on water quality and supply

The feedback from scoping consultees and through public consultation processes will inform the proposed development design and assessments undertaken during the EIAR.

The Wind Energy Development Guidelines (2006) (the Guidelines) state that:

> *"While it is not a mandatory requirement, it is strongly recommended that developers of a wind energy project should engage in active consultation and dialogue with the local*

community at an early stage in the planning process, ideally prior to submitting a planning application".

This was further addressed in the Preferred Draft Approach to Wind Energy Development in Ireland (June 2017) which stated the following with respect to planning applications for wind farms:

"Planning applications must contain a Community Report prepared by the applicant which will specify how the final proposal reflects community consultation. The Community Report must also outline steps taken to ensure that the proposed development will be of enduring economic benefit to the communities concerned".

The Draft Revised Wind Energy Guidelines (Department of Housing, Planning and Local Government, 2019) (the draft Guidelines) has retained this position stating the following:

"In order to promote the observance of best practice, planning authorities should require applicants to prepare and submit a Community Report with their planning application and a condition on any subsequent planning permission should require developers to carry out the development in accordance with the approved Community Report".

The Proposed Development will provide an enduring economic benefit to the communities surrounding the Proposed Development as outlined in Appendix 2-2 of the EIAR, through the community benefit package for residents and community groups, employment during the construction and operation of the Proposed Development and through the annual rates payable to the local authority.

2.8.2 Pre-Planning Meeting

2.8.2.1 Kilkenny County Council

2.8.2.1.1 *1st Pre-Planning Meeting*

Members of the project team held a pre-application meeting with Kilkenny County Council on the 22nd May 2024 under section 247 of the Planning and Development Act 2000, as amended. The purpose of this meeting was to discuss the Community Engagement and provide a high-level introduction to the Proposed Development.

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

- An introduction to the Applicant and the team
- A high-level overview of the Proposed Development including Site Selection and Site Location
- An overview of relevant planning policies including compliance with local wind energy policy in both County Laois and County Kilkenny.
- A discussion of site constraints and a detailed overview of the Proposed Development, including the grid connection.
- Overview and assessment of Turbine Delivery.
- Nationally Designated Areas and Natura 2000 sites within the area.
- Provided specific details of the scheme relating to LVIA, Ecology and Aviation.
- Set out the scope of the Environmental Impact Assessment Report to be undertaken.
- Discussed scoping and pre-application/ public consultation undertaken to date.

Kilkenny County Council provided feedback and discussion as follows:

- In relation to the Grid Connection the Roads Department of Kilkenny County Council gives concern about the other proposals in the area also having a grid connection into the Ballyragget substation. Stating that the road network is the most concern with coordination of all the grid connections into the same substation.
- Kilkenny County Council advised that landscape photomontages are the most important of this assessment. Stating that the visual impact of the turbines will be the most important.
- The council noted a wind farm east to the site which was submitted to the Commission recently.
- The council closed the meeting by stating that no update has been made on the Ministerial Draft Direction.

2.8.2.1.2 2nd Pre – Planning Meeting

A second meeting was requested with Kilkenny County Council in March 2025, via MS Teams, to discuss updates to the Proposed Development. That request culminated in a second Section 247 meeting between the Council and representatives of the project team on the 22nd May 2024.

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

- Site Location Context
- Proposed Development
- Policy Overview- Laois Wind Energy Strategy and Justification for Turbine Location
- Public Consultation, Scoping and Pre-Application Consultation
- Proposed Development Timeline
- Application Validation Consultation

Kilkenny County Council provided feedback:

- Kilkenny County Council requirement of 1 hard copy of the planning application and to electronically upload the copy first and then discuss which documents are needed in the form of hard copies.
- To discuss drawings/ site notices/ planning fee with Kilkenny County Council technicians.
- Noted Ballynalacken wind farm.
- To make sure noise, vibration, shadow flicker chapters are all discussed robustly and regard to any reports made on the Ballynalacken wind farm application.
- To note to any of the national monuments within the site boundaries.
- Noted that the River Nore and Cullahill Mountains will be assessed by KCC and the NPWS
- Kilkenny County Council Roads department discussed the problem with the national road only recently being recently realigned concerns with TII transverse crossings, it was noted that the grid connection should be plan led, there are a lot of grid connections applied for recently going into the Ballyragget substation, including two solar farms.
- Noted the ESB documentation which encourages to look at multiple route options and other substations.
- Action to get agreed the type of ducting, the depth of ducting, the locations of the chambers is required.
- Queried ownership of the grid connection and how is going to be managed down the line.
- Kilkenny County Council Environment department briefly talked about dust and the technical drilling aspect of the grid connection, also making reference to noise, CEMP and hydrology.

2.8.2.2 Laois County Council

2.8.2.2.1 *1st Pre-Planning Meeting*

Members of the project team met with Laois County Council for a Pre-application Meeting on the 29th May 2024. The purpose of the meeting was to discuss Community Engagement and provide a high level introduction to the Proposed Development

Members of the project team and the Applicant met with representatives from Laois County Council in accordance with Section 247 of the Planning and Development Act 2000 (as amended) (the Act) via MS Teams on the 29th May 2024.

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

- An introduction to the Applicant and the team
- A high-level overview of the Proposed Development including Site Selection and Site Location
- An overview of relevant planning policies including compliance with local wind energy policy in both County Laois and County Kilkenny.
- A discussion of site constraints, including the analysis of the Laois Wind Energy Strategy and a detailed overview of the Proposed Development, including the grid connection.
- Overview and assessment of Turbine Delivery.
- Nationally Designated Areas and Natura 2000 sites within the area.
- Provided specific details of the scheme relating to LVIA, Ecology and Aviation.
- Set out the scope of the Environmental Impact Assessment Report to be undertaken.
- Discussed scoping and pre-application/ public consultation undertaken to date.

The matters that were discussed with Laois County council at the end of this meeting included:

- Project Layout Justification: Rationale for turbine location and final height decisions
- Policy Context: Planning report should clearly articulate the benefits of the wind farm—how it meets policy goals, supports homes/businesses, and provides community value.
- Community Benefit: Highlight the return to the local community, including potential community fund impacts and engagement with landowners.
- Technical Assessments: Address concerns over turbine foundation depth, potential impacts on hydrology and aquifers, to be detailed in the EIAR.
- Decommissioning and Restoration: Include a Decommissioning Plan, Construction Environmental Management Plan (CEMP), and Site Restoration Plan with the application.
- Road Impacts: Identify and assess local roads in Laois that might be affected; confirm if they can handle wind turbine component loads.

2.8.2.2.2 *2nd Pre- Planning Meeting*

A second pre-planning meeting took place with Laois County Council on the 15th May 2025 via MS Teams. This meeting took place to give Laois County Council an update of the Proposed Development.

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

- Site Location Context
- Proposed Development
- Policy Overview- Laois Wind Energy Strategy and Justification for Turbine Location
- Public Consultation, Scoping and Pre-Application Consultation

- Proposed Development Timeline
- Application Validation Consultation

The matters that were discussed in this meeting included:

- Laois County Council gave feedback on the access roads to the sites, confirming that there are no access roads in County Laois and all access is directly from County Kilkenny.
- Laois County Council Environmental Engineer confirmed a number of items in relation to the Barrow Pit, Drainage Silt Traps being discharged locally, breaking out hydrological limestone close to the surface and hydrological assessments taking place.
- Laois County Council questioned the watercourses and Freshwater Pearl Mussel within the area.
- The population and housing within the area was discussed, stating that area is primarily farmhouses in the area and questioning how many landowners are involved in the project.
- Laois County Council makes reference to shadow flicker, noise, aircraft safety, visuals, logistics, constructions, proximity to main road, archaeology, monuments, gird line and flora and fauna within the area.
- Photomontages submitted as part of the application.
- The policy was noted and referred to the Ballynalacken wind farm and the Pinewoods wind farm which is also on the Kilkenny/ Laois Boarder.
- Discussions held on the validation of the planning application. Questioning survey work onsite and also questioned about the Cullahill wind farm.
- Reference made to the larger scale of the development in open to consideration area, making reference to the planning report and how many MW are in each county.

2.9 Cumulative Impact Assessment

The EIA Directive and associated guidance documents state that as well as considering any direct, indirect, secondary, transboundary, short-, medium-, and long-term, permanent, and temporary, positive and negative effects of the project (all of which are considered in the various chapters of this EIAR), the description of likely significant effects should include an assessment of cumulative impacts that may arise. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to the project. The factors to be considered in relation to cumulative effects include population and human health, biodiversity, land, soil, water, air, climate, material assets, landscape, and cultural heritage as well as the interactions between these factors.

To gather a comprehensive view of cumulative impacts on these environmental considerations and to inform the EIAR process being undertaken by the consenting authority, each relevant chapter within this EIAR includes a cumulative impact assessment where appropriate.

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

2.9.1 Methodology for the Cumulative Assessment of Projects

The EIA Directive includes a requirement to consider '*a cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources*.' The methodology for the cumulative assessment has been informed by the relevant Guidance documents and by the nature and scale of the Proposed Development.

The potential cumulative impact of the Proposed Development and combined with the potential impact of other projects or plans has been carried out with the purpose of identifying what influence the

Proposed Development will have on the surrounding environment when considered collectively with approved and existing projects, projects pending a decision from the planning authority, projects in the public domain such as those Strategic Infrastructure Development (SID) at pre-consultation with An Coimisiún Pleanála, and land-uses in the vicinity of the Proposed Development site location.

The cumulative impact assessment of projects has three principle aims:

1. To establish the range and nature of existing and approved projects within the cumulative impact study area of the Proposed Development.

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

Assessment material for this cumulative impact assessment was compiled on the relevant developments within the vicinity of the Proposed Development. The material was gathered through a search of relevant online Planning Registers, reviews of relevant EIAR (or historical EIS) documents, planning application details and planning drawings, and served to identify past and future projects, their activities and their environmental impacts.

2.9.2 Cumulative Study Area

The geographical boundaries of the various zones of sensitivity of and to the Proposed Development from which there may be potential for cumulative impacts to arise relative to each individual EIAR topic, i.e each chapter, is presented below in Table 2-7. Following consultation with the EIAR team on each individual topic, the maximum geographical extent and justification for this extent was established and is presented below.

Table 2-7: Cumulative Study Areas and Justification

Individual Topic	Maximum Extent	Justification
Population & Human Health (including shadow flicker)	**Proposed Wind Farm:** Proposed Wind Farm site Study Area for Population (1.5km) Shadow Flicker Study Area (10xRD buffer from proposed turbines) **Proposed Grid Connection Route:** Proposed Grid Connection Route Study Area for Population (200 from underground electrical cabling route) Consideration for the Population & Human Health cumulative extent is also given to the Air & Climate, Noise and Landscape & Visual (i.e Residential Visual	The Study Area for Population is identified in Section 5.3.1 in Chapter 5 as the District Electoral Divisions where the Proposed Wind Farm site is located. For the Proposed Grid Connection Route, the Study Area for Population is identified as 100m from the proposed underground electrical cabling route. Both the Proposed Wind Farm site and Proposed Grid Connection Route Study Areas for Population identified are considered for cumulative effects on Population. For the assessment of cumulative shadow flicker, any other existing, permitted or proposed wind farms are considered where their ten times rotor diameter shadow flicker study area are located within the Shadow Flicker Study Area of max 1.55km (ten times the rotor diameter from proposed turbines) for the Proposed Wind Farm. As the nearest proposed, permitted or existing wind farm is 1.3km south of the proposed turbines at their

Individual Topic	Maximum Extent	Justification
	Amenity) Cumulative Study areas	closest points, the potential for cumulative shadow flicker impacts has been assessed.
Biodiversity (Bats)	**Proposed Wind Farm:** 10km from Proposed Wind Farm site **Proposed Grid Connection Route:** 200m from the grid underground electrical cabling route. Consideration for the Biodiversity cumulative extent is also given to the Birds and Water Cumulative geographical boundaries.	Using the precautionary approach and given the nature and scale of the Proposed Development, the geographical boundary for terrestrial ecological aspects, i.e. habitats, is 10 km for cumulative assessment for the Proposed Wind Farm and 200 m from the Proposed Grid Connection Route.
Birds	25km buffer from proposed turbines for large infrastructural development, such as wind farms, energy.	NatureScot guidance '*Assessing the Cumulative Impacts of onshore Wind Energy Developments'* (SNH, 2012; 2018) was consulted while undertaking the cumulative assessment. SNH (2012; 2018) emphasises that its priority is to '*maintain the conservation status of the species population at the national level*.' However, it is acknowledged that consideration should also be allowed for impacts at the regional level *'where regional impacts have national implications (for example where a specific region holds the majority of the national population)'*. Following the guidance of SNH (2012), the cumulative impact assessment has been carried out at the scale of the importance rating of the receptor. A 25km radius of the Proposed Wind Farm site turbines was considered a reasonable approximation of the size of a county and a 5km radius of the Proposed Wind Farm site turbines was considered a reasonable approximation for the local level.
Water	**Proposed Wind Farm:** Nore Catchment for large infrastructural developments such as wind farms, energy and public transport developments. River Sub Basins for all smaller proposed, permitted or existing plans or projects (i.e. private and commercial type developments).	Regional surface water catchments are used for cumulative impact assessment with regard large infrastructural developments such as wind farms, energy and public transport developments. The potential for cumulative effects for these developments likely exists on a regional catchment scale (i.e. significant works likely existing in several sub-basins).

Individual Topic	Maximum Extent	Justification
	Proposed Grid Connection Route: Within a 200m buffer zone of the Proposed Grid Connection Route.	Therefore, other wind-farm developments are considered within the Shannon Catchment for cumulative effects. River Sub Basins are used for smaller developments (i.e. private & commercial type developments). These developments are not likely to present a significant cumulative impact risk on a regional catchment scale as any effects would likely be imperceptible as a result of the setback distances and localised nature of the associated works. Given the nature and scale of the proposed works and the lack of hydrological cumulative impact potential beyond the river sub basin scale, the Water cumulative study area is defined by river sub basins in which the Proposed Wind Farm is located. Due to the narrow nature of the Proposed Grid Connection Route trench (~0.6m wide), a 200m buffer zone is an appropriate scale when considering potential cumulative effects on the water environment.
Land, Soils and Geology	EIAR Site Boundary	As there is no pathway for offsite cumulative impacts for Land, Soils and Geology, the cumulative study area is the EIAR Site Boundary.
Air & Climate	**Proposed Wind Farm:** Air Quality Study Area is 1km from Proposed Wind Farm. **Proposed Grid Connection Route:** 200m from Proposed Grid Connection Route.	Given dust particles do not generally travel greater than 500m from source (*Guidance on the Assessment of Mineral Dust Impacts for Planning*, IAQM 2016) the geographical boundary for the cumulative dust impact is 500m. In line with the TII Publication Air Quality Assessment of Proposed National Roads – Standard PE-ENV-01107, December 2022, a geographical boundary of 1km was used for cumulative air quality assessment. The Climate assessment has considered the cumulative effects of the Proposed Developments with other developments on a national basis and within the context of the national Carbon Budget and relevant sectoral emissions ceiling.

Individual Topic	Maximum Extent	Justification
Noise & Vibration	**Proposed Wind Farm:** The list of wind farms which were initially considered in cumulative assessment extended to 10 km. **Proposed Grid Connection Route:** 200m from Grid Connection underground electrical cabling route.	The geographical boundary for the cumulative noise assessment is the area within which noise levels from the proposed, consented and existing wind turbine(s) may exceed 35 dB LA90 at up to 10m/s wind speed (Institute of Acoustics document *Good Practice Guide To The Application Of Etsu-R-97 For The Assessment and Rating of Wind Turbine Noise*).
Cultural Heritage	5km from Proposed Development turbine locations	The study area reflects the 5km study area assessed for the Proposed Wind Farm, in terms of sites subject to statutory protection. Given that any archaeological remains identified within the footprint of the proposed project will be preserved in-situ or by record, no negative cumulative construction effects have been identified.
Landscape & Visual	20km from Proposed Development turbine locations for visual and landscape effects. 15km from Proposed Development turbine locations for effects on landscape character.	The LVIA Study Area was chosen as 20 kilometres for landscape and visual effects as is suggested by guidance: *'For blade tips in excess of 100m, a Zone of Theoretical Visibility radius of 20km would be adequate'* (WEDGs Page 94, DoEHLG, 2006; Page 152, DoHPLG, 2019) Through experience conducting LVIA for other wind energy development projects, the assessment team determined that no significant effects on landscape character are likely to arise beyond distances of 15km from the proposed turbines. Therefore, a LVIA Study Area of 15km is deemed appropriate for effects on landscape character in relation to the assessment of effects upon designated Landscape Character Areas.
Material Assets	**Proposed Wind Farm:** The list of wind farms and other large scale projects which were initially considered in cumulative assessment extended to 10 km. **Proposed Grid Connection Route:**	Informed by traffic modelling scenario and the area of influence the Proposed Development has on changing traffic volumes. The potential cumulative traffic effects with the Proposed Development are assessed on the following criteria; › Project status (proposed to operational)

Individual Topic	Maximum Extent	Justification
	200m from the grid underground electrical cabling route.	› Degree of overlap with the Proposed Development delivery highway network (low to high) › Traffic volumes (low to high) The geographical boundary for the traffic & transport cumulative assessment is defined by the potential for other projects to overlap with the Proposed Wind Farm delivery highway network, and so a 10km buffer from turbines and 200m buffer from the proposed underground electrical cabling route is deemed appropriate to capture other plans and projects with the potential for cumulative effects with the Proposed Development. Please refer to Chapter 15 Material Assets for further details on the cumulative assessment methodology.
Material Assets: Telecoms, Aviation and Other Utilities	The list of wind farms and other projects which were initially considered in cumulative assessment extended to 25 km. 200m from the grid underground electrical cabling route.	The geographical boundary for the telecoms cumulative assessment is defined by the potential for other wind farm projects to interfere with broadcast signals that interact with the Proposed Development.

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

2.9.2.1 Other Developments/Land uses

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

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

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

2.9.3 Summary

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

Overall, the Proposed Development will not have any additional impacts over and above what has been assessed and permitted previously, as there are no additional works proposed. Additional detail in relation to the potential significant cumulative effects arising and, where appropriate, the specific suite of relevant mitigation measures proposed are set out within each of the relevant chapters of this EIAR.