# 4 Planning and Policy

## 4.1 Introduction

This chapter of the Environmental Impact Assessment Report (EIAR) examines waste management, energy, climate change and planning policy, and the legislative context at European, national, regional and local levels with relevance to the Proposed Anaerobic Digestion Facility Development at Glenloughaun, Ballinasloe, Co. Galway.

The planning history most relevant to the Site is also summarised below.

## 4.2 Need for the Proposed Development at Glenloughaun, Ballinasloe

The Proposed Development represents a location-specific form of development. A key factor determining the appropriateness of locating an AD facility within a given area is the availability of significant feed sources. Additional key factors include proximity to a potential connection point to the gas grid, the capacity of local transport infrastructure to support the proposed development, the ability of a site to provide for visual screening to reduce visual impact, and the potential for impact on sensitive environmental receptors. The applicants have undertaken an extensive site selection exercise, as part of their overall roll-out of strategically important biomethane developments in the State. The site selected for the Proposed Development is an appropriate site for a development of the nature and scale of that which is proposed.

- The location of the Proposed Development allows for proximity to feedstock sources and users of the digestate produced in the AD process. This reduces transportation requirements and increases the overall sustainability and efficiency of operations.
- Based on the significant level of feedstock capacity identified by the applicant in the area surrounding the Site, there is a location specific need for the provision of an AD facility in the area, with the Site well suited to this use due to its accessibility, proximity to gas connections, and the ability of the Site to accommodate screening to effectively reduce the visibility and visual impact of the Proposed Development.
- Similarly, the EIAR has determined that the Proposed Development will not give rise to any significant ecology, landscape, soils, air quality / odour impact, or water impact. The Proposed Development is appropriately sited, designed, and laid out to avoid any adverse impacts on the amenity of residential properties in the wider vicinity.
- The applicant and environmental consultants (ORS) have undertaken a robust assessment of alternative locations for the Proposed Development and has been determined that the selected Site is the most appropriate based on a range of environmental considerations. This is set out in detail within Chapter 3 of this EIAR.
- The Proposed Development has been carefully sited and designed, to ensure that a high degree of visual screening is provided through landscaping and layout to achieve a low level of visibility, maintaining and integrating the Proposed Development with the rural character of the local area.

## 4.3 Site Planning Application History

The following planning history is based on a review of the Proposed Development site ('the Site' hereafter) and surrounding area using the Galway County Council ('GCC' hereafter) 'ePlan Online Enquiry' planning application viewer.

### 4.3.1 Subject Site

2 no. planning application have been made on the Site, including the eastern portion of the Site and lands immediately to the north / northeast.

Reg. Ref.: 99/2499 – Abattoir

GCC issued a final grant of permission on the 7th January 2000, subject to 12 no. conditions, for *"extension/alteration of abbatoir and upgrade treatment works".*

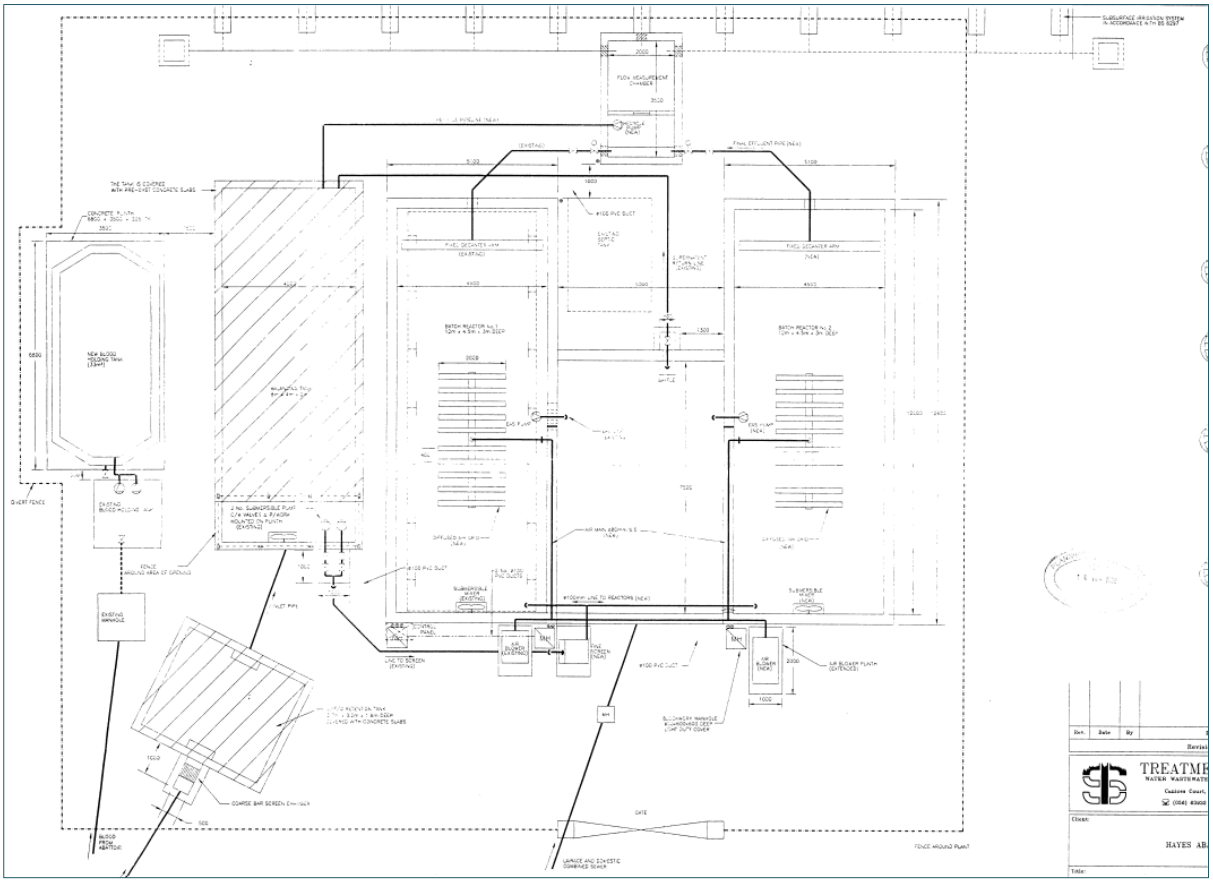

**Figure 4.1:** Extract from Site Layout Plan, Reg. Ref.: 99/2499 [Source: Extract from Site Layout Plan, Reg. Ref.: 99/2499]

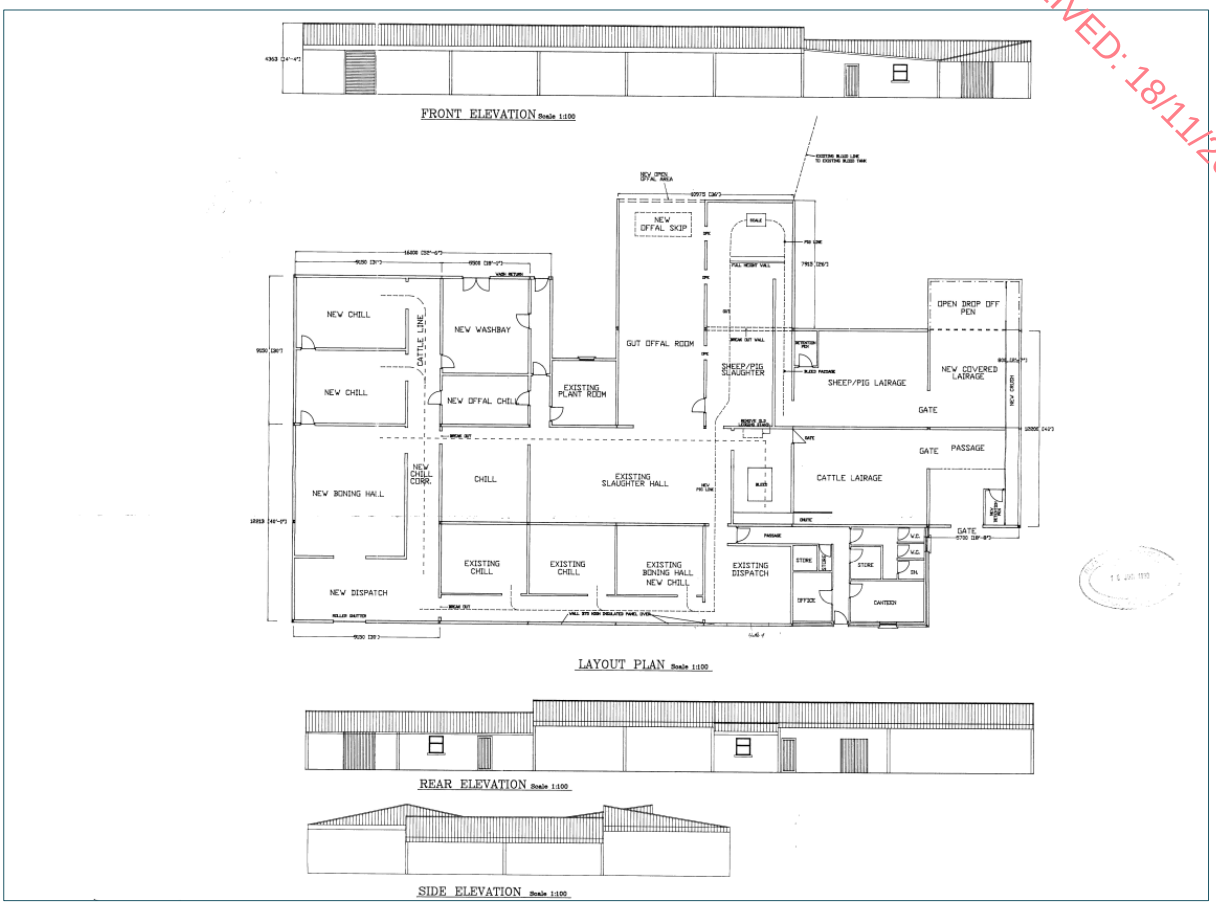


**Figure 4.2:** Extract from Ground Floor Plan, Reg. Ref.: 99/2499 [Source: Extract from Ground Floor Plan, Reg. Ref.: 99/2499]

Reg. Ref.: 05/5103 – Retain Revised Abattoir Layout

Within the same site boundary as the previously approved development under Reg. Ref.: 99/2499, GCC issued a final grant of permission on the 11th of September 2006, subject to 3 no. conditions, for development which includes the eastern portion of the Site. The proposed development was described as follows within the public notices:

*"(a) retention of revised internal layout of existing abattoir including new boning halls, chills, boxing room, wash room, lairage, dispatch areas, stores, offices, welfare areas, toilets and canteen at ground and first floor levels (b) retain revised elevations (c) retain boilerhouse/workshop (gross floor space 1594sqm)."*

GCC requested further information (FI) on the 23rd of February 2006. The requested items are summarised below:

- A report from a suitably qualified person in relation to the existing effluent treatment system on site. Submit a statement, stating that the existing development complies in all respects with the EPA Wastewater Treatment Manual – Treatment Systems for Small Communities, Business, Leisure Centres and Hotels.
- If the current effluent treatment system is not up to the standards required under the EPA Wastewater Treatment Manual, please submit all relevant details (EPA site

suitability assessment, trial hole, loading calculations etc) to ensure that the development complies with these standards.

The conditions of the final grant included the following:

- *"The front boundary of the site setback for the distance of the sight distance, triangle to the west of the access point. This shall be done within 6 months of the date of grant of this permission."*


**Figure 4.3:** Extract from Existing Site Layout Plan, Reg. Ref.: 05/5103 [Source: Extract from Existing Site Layout Plan, Reg. Ref.: 05/5103]

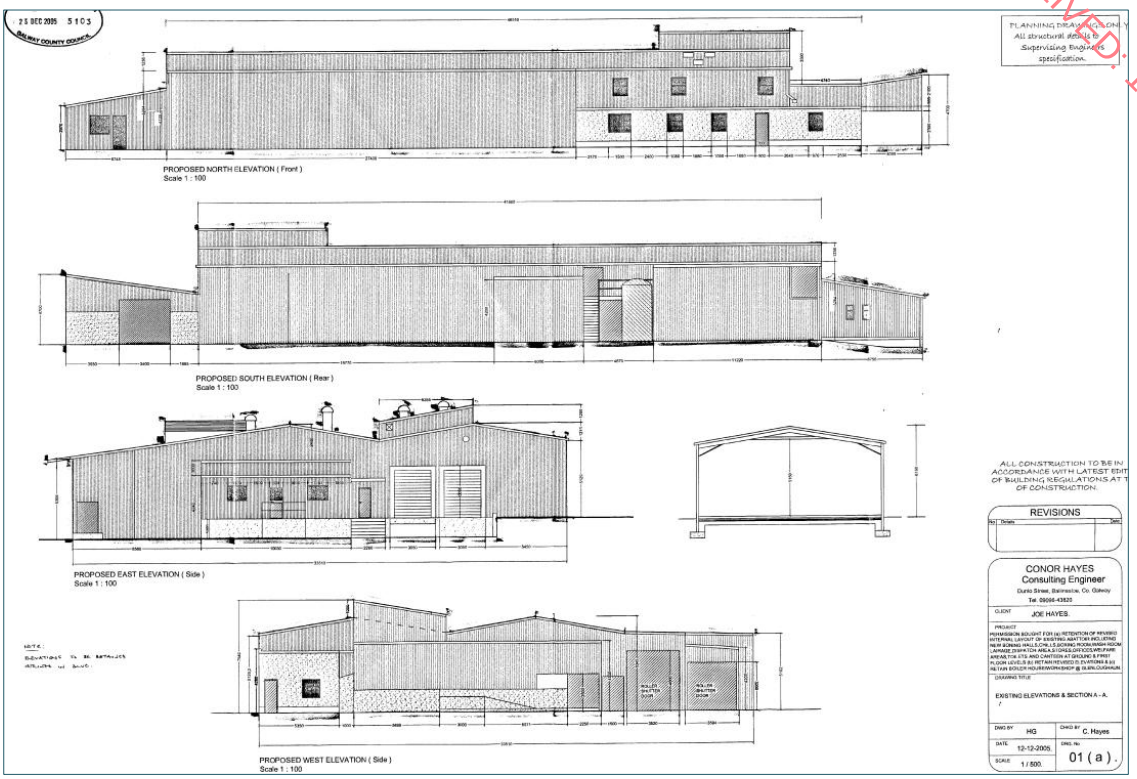


**Figure 4.4:** Extract from Sections and Elevations drawing, Reg. Ref.: 05/5103 [Source: Extract from Sections and Elevations drawing, Reg. Ref.: 05/5103]

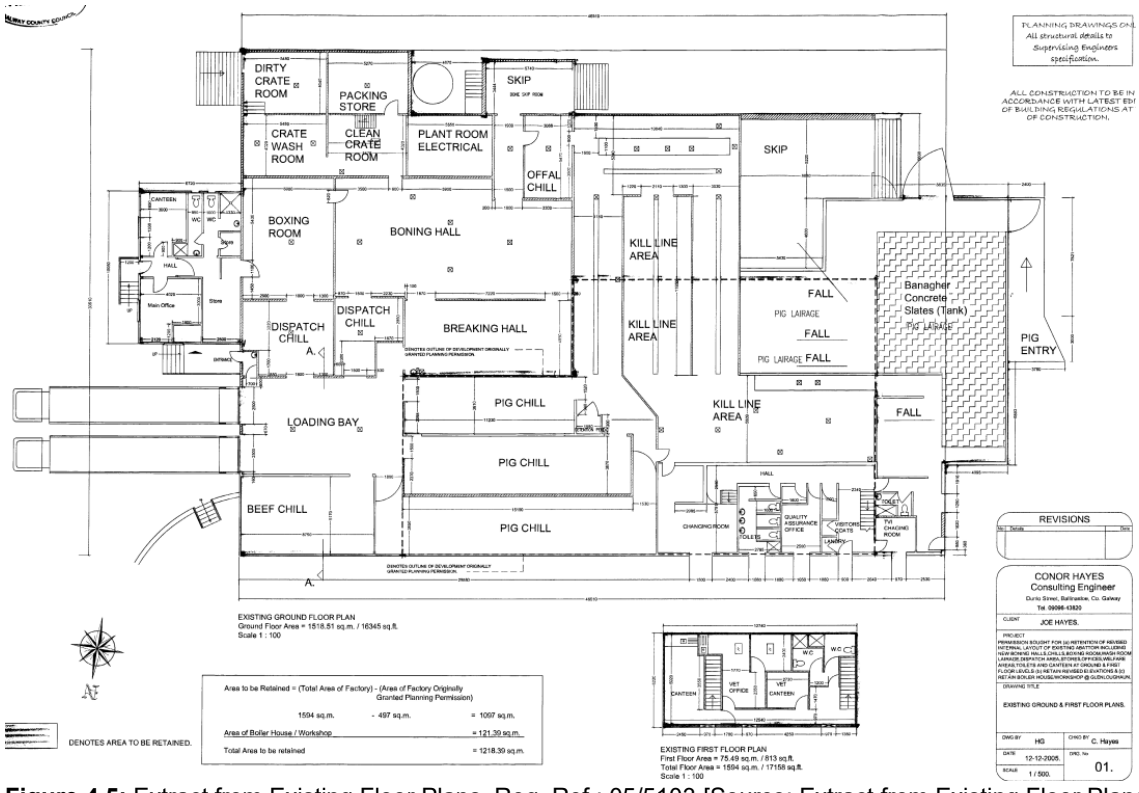


**Figure 4.5:** Extract from Existing Floor Plans, Reg. Ref.: 05/5103 [Source: Extract from Existing Floor Plans, Reg. Ref.: 05/5103

**Nearby Sites:**

We note the following planning history for adjacent and nearby sites relevant for the subject proposal.

Reg. Ref.: 96/887 – East of Site – Extension to Concrete Batching Plant

GCC issued a final grant of permission on the 27th April 1998, subject to 5 no. conditions, for *"retention and completion of extension to concrete batching plant including provision of block making facilities and ancillary site services".*

Reg. Ref.: 08/1827 – East of Site – New Dwellinghouse Refused

GCC refused permission on the 23rd September 2008, for the construction of *"a new dwellinghouse, septic tank with percolation area, domestic garage and all other associated site services (Gross floor area 256.75 sqm)".*

Reg. Ref.: 07/4070 – East of Site – Dwellinghouse Refused

GCC refused permission on the 25th January 2008, for the construction of a *"new dwellinghouse, septic tank with percolation area, domestic garage, site entrance and all other associated site services. (Gross floor area 256.75sqm)".*

Reg. Ref.: 04/798 – East of Site – Dwelling House

GCC issued a final grant of permission on the 24th May 2004, subject to 13 no. conditions, *"for construction of dwelling house and septic tank (gross floor space 163.83 sqm)".*

We note the following conditions of the final grant:

- Dwelling house shall be connected to the Group Water Supply Scheme.
- Overhead and underground lines shall be kept back in line with the new fenceline and no obstructing pole(s) shall be left in the layby or in the sight lines of the proposed development or any existing development.

Reg. Ref.: 09/694 – East of Site – Domestic Garage

On the same site as the development granted under 04/798, GCC issued a final grant of permission on the 24th August 2009, subject to 5 no. conditions, *"to erect a domestic garage/store (gross floor space 75.95sqm)".*

Reg. Ref.: 14/554 – East of Site – EoD – Domestic Garage

On the same site as the development granted under Reg. Ref.: 09/694, GCC issued a final grant of Extension of Duration (EoD) permission on the 15th July 2014, *"to erect a domestic garage/store (gross floor space 75.95sqm. Previous Planning Ref No. 09/694)".*

Reg. Ref.: 98/3475 – Southeast of Site – House Refused

GCC refused permission on the 14th December 1998, *"for the erection of house and construction of septic tank".*

Reg. Ref.: 04/3253 – Southeast of Site – Dwellinghouse

On the same site as development refused under Reg. Ref.: 98/3475, GCC issued a final grant of permission on the 18th October 2004, subject to 14 no. conditions, *"for dwellinghouse, domestic garage with septic tank and associated services (gross floor space house 242.05sqm and shed 34.70sqm)".*

Reg. Ref.: 07/4030 – South of Site – 38 KV Line

GCC issued a final grant of permission on the 3rd March 2008, subject to 4 no. conditions, for the following development (as described within the public notices):

*"to build a 38kvline from existing Somerset 110kv Station to a point on the existing 38 kv line at Glenloughaun passing through or in the vicinity of the following townlands: somerset, Barnpark, Lakefield, Chapelpark, Glenaun, Gortnahorna (Clanricarde) Gortnahorna (Clancarty) Gorteencahill, Glenloughaun, Mackney (Clancarty)."*

Reg. Ref.: 06/2803 – North of Site – Dwelling Refused

GCC refused permission on the 28th November 2006, subject to 3 no. reasons, *"to construct new dwelling house, treatment system and percolation area (Gross floor area 140.4 sqm)".*

Reg. Ref.: 00/1868 – North of Site – Extension to Dwellinghouse

GCC issued a final grant of permission on the 31st July 2000, *"for the construction of an extension and to make alterations to dwellinghouse".*

Reg. Ref.: 15/319 – West of Site - Dwellinghouse

GCC issued a final grant of permission on the 20th July 2015, subject to 12 no. conditions, *"to construct a dwellinghouse, domestic garage & proprietary treatment system (Gross floor space 224.60sqm)".*

Reg. Ref.: 16/596 – West of Site – Relocate Dwellinghouse

On the same site as development granted under Reg. Ref.: 15/319, GCC issued a final grant of permission on the 31st October 2016, subject to 13 no. conditions, *"to retain filled area and to relocate dwellinghouse, domestic garage & proprietary treatment system on a site with revised boundaries (gross floor space 224.60sqm)."*

Reg. Ref.: 04/1748 - West of Site – Quarrying Sand and Gravel Pit

GCC refused permission on the 16th August 2004, *"for construction of a quarrying sand and gravel pit, including retention of a new access road and for retention and completion of excavation works".*

### 4.3.2 Biogas Facility Related Planning Permissions

ACP Ref.: ABP-308942-20 – Granted; and GCC Ref.: 19/1812 – Refused – Within the Townlands of Ballynamantan, Kinincha and Glenbrack, Gort, Co. Galway

GCC refused permission on the 24th January 2020 for the construction of a biogas plant,

located within the townlands of Ballynamantan, Kinincha and Glenbrack, Co. Galway. This application site had an area of 9.486 hectares, located in a rural area north of the town of Gort.

The proposed development was outlined as follows within the public notices:

*"for development of a Biogas Plant on a 10.01 hectare (ha) site located in the townlands of Ballynamantan, Kinincha and Glenbrack. The Biogas plant will utilise anaerobic digestion technology to produce renewable energy and organic fertiliser. The plant will consist of; (i) Two storey office building (509 sq. m floor area) with connection to public sewer; (ii) single store electrical substation building (14.43 sq. m. floor area) and associated bunded transformer; (iii) 13.4m high feedstock reception building (3,806 sq. m floor area) incorporating; airlock lobby, feedstock reception area, processing and mixing areas, pasteurisation vessels and ancillary heating technology, wash down area, feedstock quarantine area, storage areas, workshop area, hygiene facilities, digestate separation area and process wastewater tanks; (iv) bunded tank farm (14,805 sq. m) containing; 2 no. pump house buildings (216 sq. m) and delivery pipework serving feedstock reception building, 8 no. digester vessels (each of c.15m in height and c.5, 120m3 in capacity) and 4 no. storage vessels (each of c.15m in height and c.5,120m3) fitted with gas collection roofs/domes, stairwell towers and gantries, bunded digestate dispatch bays; (v) biogas purification plant on raised concrete apron (vi) Carbon dioxide processing building (10.44m in height, 138 sq. m floor area) containing treatment plant and 4 no. outdoor storage tanks and dispatch area; (vii) Odour control system comprising air scrubber units, carbon adsorption bed and associated stack of up to 23m in height; (viii) energy centre, containing combined heat and power (CHP) plant and 2 no. standby boilers with exhaust stacks (16.4m in height); (ix) Biogas ground flare stack (c. 8m in height) and gas booster station; (x) weighbridge with secure lift barrier and all ancillary development. The development includes for construction of a new entrance to the site from N18/458 with associated signage and an access road (area of 1.734ha) from the new entrance to the Biogas plant. Permission is being sought for 10 years and is a development that is for the purpose of an activity requiring an Industrial Emissions Licence from the EPA. An EIAR and NIS has been prepared and accompanies this planning application. Gross floor space of proposed works: 4163.5 sqm."*

The Council's reason for refusal is summarised below:

1. *"The proposed development would involve the redesign of an existing Regional Road entrance (R458) and associated works and a significant intensification of use of this entrance to facilitate a high daily volume of commercial HGV traffic with associated frequent accessing and egressing daily turning movements onto a busy regional road at a point where the maximum rural speed limit applies for this category of road, where sight distance is below optimum, and where traffic is known to be fast moving for this category of road. It is considered therefore that the proposed development would present undue potential for the creation of dangerous and conflicting traffic movements and would accordingly be prejudicial to public safety. The Planning Authority, in addition, is not satisfied that the proposed development would not, by reason of the volume of HGV movements potentially associated with the proposed use, and residual uncertainties over regulation of the routing and off site control of HGV traffic associated with the proposed use, generate undue traffic congestion and conflict between commercial HGV traffic and other urban traffic in nearby Gort town centre and Junction16. The proposed development would accordingly be contrary to the proper planning and sustainable development of the area.*

2. *The Planning Authority, having reviewed the justification submitted with this application, is not satisfied that the proposed development, located in a rural area close to Gort, which is not zoned for development, due to the nature and scale of the proposed development as outlined in submissions received with this application in the context of Galway County Development Plan Objective ER 8, satisfactorily meets the criteria set out therein. It is considered therefore that the proposed industrial development, located in a rural area, upon which the use is not dependent for electrical or gas grid connection, would be contrary to the provisions of Objective ER 8 and Objective EDT7 of the Galway County Development Plan 2015-2021. The proposed development would accordingly be contrary to the proper planning and sustainable development of the area.*

3. *The proposed development would entail the construction of commercially operated anaerobic digestion biogas plant, which would contain several large structures, within an open, exposed and low-lying rural area which is characterised by low intensity agricultural activities. Having reviewed the submitted plans and particulars, Landscape and Visual Assessment contained within the submitted EIAR and associated photomontages with respect to the chosen receptors, the Planning Authority are not satisfied that the development would not be visually obtrusive and adversely impact on the receiving Class 3 landscape, including the Coole Demesne area to the north, the Kinincha Road/Gort River area and other potentially sensitive receptors. It is also considered that additional viewpoints would have been required to enable the Planning Authority to fully assess the proposal from a visual impact perspective and furthermore that the potential for visual impact of any visible air emissions associated with the use should all have been assessed in detail as well as the potential visual impacts of stacks and any visible air emissions associated with the use from a wider visual catchment study area. The proposed development would accordingly be contrary to the provisions of Policy LCM1and Objective LCM 2 of the Galway County Development Plan 2015-2021, would seriously injure the amenities of the rural area, and would, therefore, be contrary to the proper planning and sustainable development of the area.*

4. *The site of the proposed development is located within c.600m of the Coole Garryland Complex SAC, c.l.lkm from Coole Garryland SPA, and within a distance of 15km of 27no.other designated European site for rare and threatened flora and fauna across the European Union (i.e. Natura 2000 network of sites), which are protected under the EU Habitats Directive (92/43/EEC) & EU Birds Directive (79/409/EEC, as amended by Directive 2009/147/EC) and the European Communities (Natural Habitats) Regulations 1997, as amended by the European Communities (Birds and Natural Habitats) Regulations 2011. The protection of these European sites is further reinforced in the 2015-2021Galway County Development Plan under Policy NHB1,Objective NHB1, Objective NHB 2, Objective NHB 3 and DM Standard 40. Based on the information included with the planning application, and the concerns identified by the Planning Authority in relation to the potential direct, indirect and cumulative impacts of air pollutants, pollutants to water quality, habitat loss/fragmentation and the exclusion of a satisfactory assessment of a number of European sites in the vicinity of the proposed development in the NIS submitted, the planning authority in conjunction with the application of the precautionary principle, consider that significant adverse effects on the integrity and conservation objectives of the European sites in the vicinity, cannot be ruled out, as a result of the proposed project. Therefore, the development is likely to have significant adverse impacts on the qualifying criteria and conservation objectives of nearby European sites, in particular the Coole Garryland Complex SAC, the Coole*

*Garryland SPA, Lough Cutra SAC and Kiltartan Cave SAC which would contravene materially a policy, objectives and a development management standard contained in the current Galway County Development Plan, and would be contrary to the proper planning and sustainable development of the area.*

5. *Based on the information submitted in the Environmental Impact Assessment Report and as identified in the Environmental Impact Assessment carried out by the Planning Authority, it is considered that the EIAR submitted has not presented a sufficient level of information and assessment in relation to impacts on population and human health, biodiversity, land, soil water air and climate, material assets and landscape, for the competent authority to make an EIA determination there is an acceptably low likelihood of environmental effects of a magnitude which would have a significant effect on sensitive environmental receptors as a result of the proposed development and mitigation proposed as part of the submitted EIAR. Therefore if permitted as proposed the development would be contrary to the proper planning and sustainable development of the area."*

A First Party Appeal of the Council's decision to refuse permission was made by the Applicant and the decision was brought to the Board for determination. The Board granted permission for the development on the 23rd December 2022.

The Board's Inspector's Report and Order concluded:

*"The Board considered that the proposed development would be in accordance with national, regional and local policy relating to energy and waste, and notwithstanding that the appeal site is not zoned for industrial use and the proposed development does not include a connection to the gas or electricity network, the Board did not consider that the proposed development was precluded at this location by any of the policies and objectives set out in the Galway County Development Plan 2022-2028 or the Gord Local Area Plan 2013-2023. Furthermore, the Board considered that, subject to compliance with the conditions set out below, the proposed development would be acceptable at this location adjoining the planned industrial expansion of Gort, would not seriously injure the residential or visual amenities of the area, and would be acceptable in terms of pedestrian and traffic safety. The proposed development would, therefore, be in accordance with the proposed planning and sustainable development of the area."*

The conditions of the Commission's final grant are summarised below:

- A maximum of 90,000 tonnes per annum of raw materials shall be treated in the anaerobic digesters.
- An annual report on the operation of the facility herby shall be submitted.
- Prior to commencement, the developer shall enter into water and/or wastewater connection agreements with Irish Water.
- Prior to commencement, and on an annual basis post operation, submit a mobility plan setting out the haul routes to and from the site for the agreement of the planning authority. The plan shall indicate the main feedstock and digestate spreading locations and demonstrate as far as is practicable how routes to and from the site to these locations are restricted to the primary routes and avoid Gort town centre and residential areas.

- Feedstock deliveries to the site and transport of digestate and biogases from the site shall be confined to between the hours of 07:00 and 19:00 Monday to Friday and between the hours of 09:00 and 15:00 on Saturday and Sunday.
- The maximum quantity of biogas and/or biomethane present on the site at one time can never exceed the relevant lower tier thresholds under the Seveso Directive.
- Existing hedgerows along the eastern site boundary shall be retained, protected from damage, and enhanced in such a manner as to ensure that its value as a commuting and foraging habitat is protected. A revised Landscape Mitigation Plan shall be submitted.
- Construction and Environmental Management Plan to be submitted.
- All solid wastes arising on the site shall be recycled as far as possible. Material exported from the site for recover, recycling or disposal shall be managed at an approved facility and in such a manger as agreed with the Planning Authority. In any case, no such wastes shall be stored on the site except with the confined of the buildings on site. Adequate on sit arrangements for the storage of recyclable materials prior to collection shall be made to the satisfaction of the planning authority.

The Commission's decision was quashed by the Order of the High Court (Perfected on the 21st of March 2024), and the case was remitted to the Commission. It is understood that An Bord Pleanála conceded the case.

The new case file for the application is under ACP Ref.: PL07.320207. A decision on the remitted case is awaited.

An Bord Pleanála Ref.: ABP-317749-23 (Donegal CC Ref.: 23/50686)

An Bord Pleanála ('the Board' hereafter) overturned Donegal County Council's (DCC) decision to refuse permission, and granted permission on the 13th July 2023, for the following development, located at Maylin, Newtowncunningham, Co. Donegal:

*"Construction and continuous operation of an agricultural biogas renewable energy facility, consisting of: (1) 3 no. primary digester tanks, (2) 2 no. post digester tanks with pumproom, (3) pasteurisation unit with auxiliary tanks, (4) emergency flare with base and security fencing, (5) 3 no. agricultural solid feeders with associated concrete bases, (6) 2 no. underground pre-reception tanks, (7) 2 no. covered agricultural digestate storage tanks, (8) gas combined heat & power (chp) unit with concrete base, (9) site office/control building with associated staff car parking area and wastewater treatment system and percolating area, (10) biogas upgrading treatment and compression system, (11) electric transformer and sub-station with security fence, (12) covered agricultural storage clamp, (13) nutrient recovery system facility with ancillary tanks and equipment, (14) 4 no. ammonium sulphate solution (ass) storage tanks with concrete bases, (15) digestate drying and pelletising facility, (16) pellet storage facility, (17) weighbridge, (18) construction of new access and entrance improvement works, (19) site lighting with security cameras, (20) surface water drainage system with storage pond and discharge system, (21) boundary earth bunded areas, landscaping, and boundary security fencing and all associated ancillary works. A natura impact statement (nis) accompanies this application."*

The site of this application was an agricultural site located in a rural area, c. 10.2km northeast from the built-up area of Letterkenny.

The Board's grant of permission was subject to 15 no. conditions; we note the following of

relevance:

- Submit a Traffic Management Plan: Include details of proposed haul routes for HGVs and larger vehicles entering and existing and shall include any haul route that necessitates a left-hand turn from the N13 onto the L5024.
- There shall be no material change in the mix of feedstock or a change in the nature of the feedstock mix without the benefit of a further planning permission.
- Submit a Lighting Plan.
- Cash deposit, bond of an insurance company, or such other security as may be acceptable to the planning authority, to secure the reinstatement of the public roads which may be damaged by the transport of materials to the site, coupled with an agreement empowering the planning authority to apply such security or part thereof to the satisfactory reinstatement of the public road.

The Board's Inspector, in their report for a recently granted biomethane facility in Maylin, Newtowncunningham, Co. Donegal, noted the following:

*"Indeed, it would appear that the nature of the development, and its reliance on agricultural feedstocks, as well as the digestate outputs from same, which are used in land spreading, would appear to favour a rural location with farmland surrounding."*

The same logic is applicable to the proposed development, which is an agri-centric anaerobic digestion facility, sourcing feedstock directly primarily from agricultural sources, and providing bio-based fertiliser directly to agricultural receivers in the surrounding area. It is also noted in the same Inspector's Report, that the proposed facility was noted to be "*not defined as 'industrial'*".

The Board's Inspector, in their report, provided the following recommendation: *"it is considered that, subject to compliance with the conditions set out below, the proposed development would support national and regional renewable energy policy objectives, would not conflict with the provisions of the operative Development Plan, would not seriously injure the visual amenities of the area or the residential amenities of property in the vicinity, would not be likely to have significant effects on the environment, or the ecology of the area, would be acceptable in terms of traffic and safety, would be acceptable in terms of archaeology, and would not give rise to increased risk of flooding of the site or of property in the vicinity. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area."*

The Board's reasons for granting permissions, as outlined in the Order, is outlined below:

*"Having regard to the provisions of the Donegal County Development Plan 2024- 2030, Ireland's National Biomethane Strategy (May 2024), the Climate Action Plan 2024 and 2025, Ireland's 4th National Biodiversity Action Plan 2023–2030, the Revised National Planning Framework (April 2025), the nature, scale, extent and layout of the proposed development, the existing hedging and screening on the site, and the pattern of development in the area, it is considered that, subject to compliance with the conditions set out below, the proposed development would support national and regional renewable energy policy objectives, would not conflict with the provisions of the operative development plan, would not seriously injure the visual amenities of the area or the residential amenities of property in the vicinity, would not be likely to have significant effects on the environment, or the ecology of the area, would be acceptable in terms of traffic and safety, would be acceptable in terms of archaeology, and*

*would not give rise to increased risk of flooding of the site or of property in the vicinity. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area."*

ACP Reg. Ref.: PL93.322136 & WC&C Reg. Ref.: 24/60536

A planning application was lodged to Waterford City & County Council (WC&CC) on the 17th September 2024, for an Anaerobic Digestion Facility, with a gross floor area of c. 3,482 sq.m on a site of c. 7.7 hectare, located in the townlands of Curraghnagarraha, Reatagh, and Curraghbalintlea, in a rural area approximately 2.5km southeast of Carrick-On-Suir. The proposal was outlined as follows within the public notices:

*""The proposed development comprises the construction of an anaerobic digestion facility to produce renewable biomethane, CO2 (which will be captured), and a bio-based fertiliser from organic material. The total gross floor area of the proposed development (including internal plant areas and ancillary structures) will be c. 3,482 sq.m. The development will consist of the following: • Construction of 3 no. digesters (c. 15.5m in height), 2 no. digestate storage structures (c. 15.5m and 12m in height), 4 no. pump houses (c. 2.59m in height), a liquid feed tank (c. 4m in height), located in the northeastern section of the site. • Construction of 4 no. pasteurisation tanks (each c. 6m in height), a post pasteurisation cooling tank (c. 4m in height) and pre fertiliser manufacturing tank (c. 4m in height) located in the centre of the site. • Construction of a part single-storey and part two-storey reception hall (with a gross floor area (GFA) of c. 2,113 sq.m and an overall height of c. 16.5m) to accommodate reception and storage areas, a laboratory, panel room, tool store, workshop, located in the northwestern section of the site. • Construction of a single-storey solid digestate storage and a nutrient recovery building (with a GFA of c. 880 sq.m and an overall height of c. 12.4m) located to the south of the reception hall, in the central section of the site. • Odour abatement plant and equipment and a fuel tank will be provided to the south of the solid digestate storage and nutrient recovery building. • 2 no. CO2 tanks (c. 10.7m in height), a CO2 loading pump (c. 2.5m in height), CO2 auxiliaries (c. 2.6m in height), CO2 liqueufactor (c. 8.2m in height), a CO2 compressor (c. 5.9m in height), a CO2 pre-treatment skid (c. 3.5m in height), and associated plant including a backup boiler / biomethane boiler and a Compressed Natural Gas compression unit / biogas compression system located in the southern portion of the site. • A H2S washing tower (c. 7.8m in height), a biogas treatment skid (c. 4.1m in height), a combined heat and power (CHP) unit and panel room (c. 10m in height), a biogas compression system, a biogas upgrading module, and an emergency biogas flare (c. 11.3m in height), also located within the southern section of the site. • Construction of a two-storey office and administration building with an overall height of c. 8.5m and a GFA of c. 272sq.m, located within the southwestern area of the site, adjacent to the main site access. • Construction of a grid injection unit (c. 2.75m in height) within a fenced compound, an ESB substation (c. 3.4m in height and a GFA of c. 23.5 sq.m), and 2 no. propane tanks located in the southwestern portion of the site. • Alterations to the existing public road (c. 475m to the south of the main site area) including provision of boundary setbacks and replacement planting, providing a new site entrance and access road to serve the development. • Associated and ancillary works including parking (6 no. standard, 3 no. EV and 1 no. disabled parking spaces and bike storage for 10 no. bikes), a weighbridge, solar PV arrays at roof level, wastewater treatment equipment, bunding and surface treatments, attenuation pond, boundary treatments, lighting, services, lightning protection masts, drainage, landscaping, and all associated and ancillary works."*

The planning application included an EIAR and NIS.

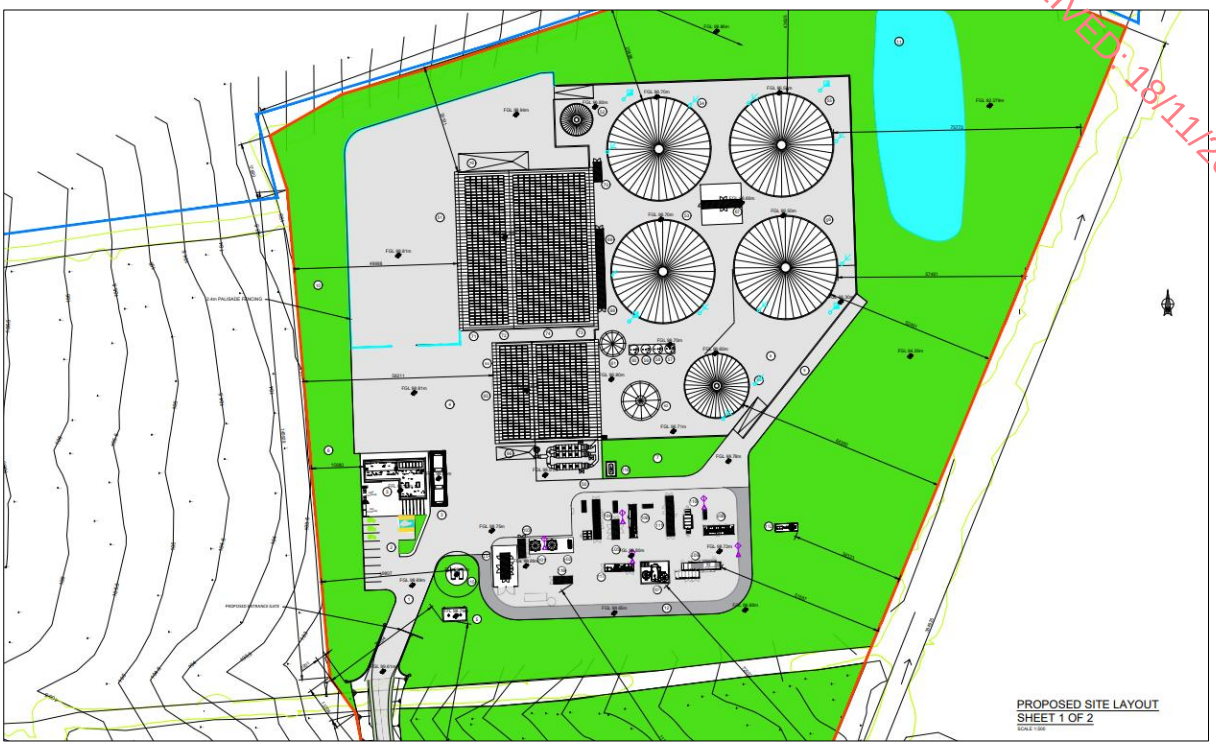


**Figure 3.1:** Extract from Layout Plan – Reg. Ref.: 24/60536 [Source: Extract from Layout Plan – Reg. Ref.: 24/60536]

Waterford City & County Council issued a notification of decision to grant planning permission on the 25th February 2025. The decision was subject to a third party appeal, and the decision was brought to the Commission for final determination. The Commission granted permission on the 24th October 2025, subject to 16 no. conditions. The conditions of relevance are summarised below:

- Maximum of 90,000 tonnes/annum of raw materials.
- Annual report on the operation of the facility.
- Prior to commencement, enter into connection agreements with Uisce Eireann.
- The maximum quantity of biogas and/or biomethane present on the site at one time can never exceed the relevant lower tier thresholds under the Seveso Directive.

The Commission's Inspectors Report stated the following:

Principle of Development:

- *"The benefits of anaerobic digestion are widely recognised in national, regional and local policy."*
- *"The form of development proposed is in my opinion acceptable and compatible with national energy and waste policy. It would contribute towards the achievement of national targets for greenhouse gas emission reductions."*

Location – Rural:

- *"It would also be consistent with policies that support rural/agricultural diversification and would promote the use of digestate as an organic fertiliser in place of the spreading of slurry or the use of chemical fertilisers."*
- *"While there may be some merit in locating anaerobic digestor facilities at zoned industrial sites, I do not accept that these are the only locations that AD plants may be considered. As put forward by the applicant, locating the proposal adjacent to a supply of agricultural feedstocks will reduce journey times to the AD facility, with an additional trip saving with the distribution of digestate fertiliser later in the process."*
- *"National and local policy clearly provides that AD facilities would form part of rural diversification, with the ultimate goal of reducing agricultural emissions. I am therefore satisfied that the location of the subject proposal in a rural area is acceptable."*

Scale:

- *"Regarding scale, I acknowledge that the Climate Action Plan supports the development of micro/small-scale energy generation. However, I do not consider that this is to the exclusion of larger scale projects as proposed."*

Grid Connection:

- *"However, notwithstanding the relative proximity of the gas and electricity grids, I am satisfied that the RSES supports the principle of gas to grid injection facilities, and a connection pipeline can be provided through a separate consenting process. Although not included in the proposed scheme, the gas connection pipeline has been considered in the EIAR and AA for the proposal."*

EIAR:

- *"Having regard to the above, I am satisfied that the likely significant environmental effects arising from the proposed development have been identified, described and assessed, and I consider that, subject to the mitigation measures proposed, the proposed project would not have any unacceptable, direct, indirect or cumulative effects on the environment."*

## 4.4 European Policy and Legislation

### 4.4.1 Energy and Climate

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

The EU has pledged to achieve climate neutrality by 2050, delivering on commitments under the Paris Agreement (COP21). Reaching this objective will require a transformation of Europe's energy supply, society, and economy. With the 2030 Climate Target Plan[1], the EC proposes to raise the EU's ambition on reducing greenhouse gas (GHG) emissions to at least 55% below 1990 levels by 2030. The plan recognises the significant contribution of the agricultural sector

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

to GHG emissions and while these emissions can never be fully eliminated under existing technology and management options, they can be significantly reduced, whilst ensuring food security is maintained in the EU. Efficient use of fertilisers, adopting precision farming, a healthier herd and the deployment of AD technologies treating organic waste to produce renewable biogas are highlighted within the plan as examples of existing technologies.

The European Green Deal package of policy initiatives was launched by the EC in 2019, which aims to set the EU on the path to a green transition, with the ultimate goal of reaching climate neutrality by 2050. The associated Fit for 55 legislative package aims to translate the ambitions of the Green Deal into law. The policy package itself underlines the need for a cross-sectoral approach in which all relevant policy areas contribute to the ultimate climate-related goal. The package includes initiatives covering the climate, the environment, energy, transport, industry, agriculture, and sustainable finance.

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

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

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

### 4.4.2 EU Common Rules on Renewable Gasses

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

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

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

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

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

the EU.

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

The common rules go on to state the following:

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

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

### 4.4.3 Renewable Energy Directive

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

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

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

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

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

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

of renewable energy developments in EU member states.

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

In addition to the new headline target to double the existing share of renewable energy sources, a strong policy framework will facilitate electrification in different sectors, with new increased sector-specific targets for renewables in heating and cooling, transport, industry, buildings, and district heating/cooling, but also with a framework promoting electric vehicles and smart recharging.

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

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

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

The proposed development is a renewable energy development which is subject to the provisions of RED III.

In accordance with the requirements of the Planning and Development Regulations 2001, as amended, which have been amended to include provisions to transport RED III, the public notices for the current application include the following wording:

*This development is covered by the provisions of the Renewable Energy Directive III (Directive (EU) 2023/2413) and it is important to note that the planning application may be subject to section 34D of the Planning and Development Act 2000 , as amended. When a notice issues in accordance with section 34D(b), the provisions of article 26A of the Planning and Development Regulations 2001 to 2025 shall apply.*

The application will be subject to a completeness check by the Planning Authority within 45 days of lodgement, and a completeness check table is included as an appendix to the JSA Cover Letter accompanying this application.

### 4.4.4 REPowerEU Energy Plan

The European Commission presented the REPowerEU Energy Plan[6] on the 18th of May 2022, which aims to tackle the climate crisis by accelerating Europe's clean energy transition and adopts a call to end European dependency on Russian fossil fuels. The Plan recognises that the uptake of biomethane involves a continued support to innovative technologies for the production of sustainable biomethane, upgrade of biogas to biomethane and its integration within the gas network.

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

### 4.4.5 EU Strategy to reduce Methane Emissions

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

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

### 4.4.6 Waste

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

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

[6] European Commission (2022) REPowerEU Energy Plan: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2022%3A230%3AFIN&qid=1653033742483

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

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

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


**Figure 4.6:** The Waste Hierarchy

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

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

## 4.5 National Planning, Climate, and Waste Policy and Legislation

### 4.5.1 National Biomethane Strategy[10]

The National Biomethane Strategy ('NBS' hereafter) was published by the Department of Environment, Climate, and Communications and the Department of Agriculture, Food and the Marine on the 28th of May 2024. The NBS sets out the necessary policy and regulatory

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

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

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

measures and provides a roadmap to developing a biomethane industry of scale in Ireland. In all aspects, this application aligns with the aspirations set out in the NBS as described in more detail below.

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

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

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

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

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

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

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

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

This application proposes to develop an AD facility to produce biomethane for injection into the national grid. This proposal is supported by the National Biomethane Strategy, and it is evident from the strategy, that this development type is crucial in order to achieve climate targets, rural and farm diversification, the replacement of chemical fertiliser with a supply of biobased fertiliser and improve gas security and diversification of supply. The proposal will create full time jobs (direct and indirect), stimulating the rural economy.

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

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

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

The Strategy states that "*Without biomethane, Ireland is unlikely to meet its legally binding climate targets.*"

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

The Strategy further states that "*Due to the nature of feedstocks required for biomethane production, it is envisaged that most developments will occur in rural Ireland*" (emphasis added).

The site of the Proposed Development, which is within a rural area in line with the provisions of the Strategy, seeks to deliver biomethane production in a location that provides access to necessary feedstock sources in proximity to the site, while minimising environmental impact and allowing for direct connection to the gas grid within the site itself.

### 4.5.2 National Planning Framework (First Revision)[11]

Both Houses of the Oireachtas have approved the first revision to the National Planning Framework (Revised NPF). The approval by the Seanad and the Dáil followed the decision of Government to approve the Draft Final Revised NPF on the 8th April.

The NPF forms the top tier of Ireland's planning policy hierarchy, setting the policy context at a national level for Regional Spatial and Economic Strategies, County and City Development

[11] Government of Ireland (2025) *NPF First Revision*: https://www.npf.ie/first-revision-to-the-national-planning-framework/national-planning-framework-first-revision-april-2025/

Plans, and Local Area Plans.

The Proposed Development aligns with the Revised NPF, the overarching policy and planning framework for the social, economic, and cultural development of Ireland. This development specifically relates to the Revised NPF in terms of Planning for Diverse Rural Places (Chapter 5) and Climate Transition and Our Environment (Chapter 9).

The Revised NPF recognised the economic, administrative, and social functions of rural towns, and seeks to strengthen such towns to become centres for local housing and employment growth, based on development that will include new low carbon and energy efficiency initiatives. We specifically note the following National Policy Objective with regard to this:

National Policy Objective ('NPO' hereafter) 32: *"Enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through the diversification of the rural economy into new sectors and services, including ICT-based industries and those addressing climate change and sustainability."*

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

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

Furthermore, the competitive advantage of rural activities associated with the bioeconomy is highlighted in the NPF (Page 129), which states:

*"While rural and coastal areas have the potential for, and will develop, many types of economic activities, those activities associated with the bio-economy such as development of new bio-refining technologies represent a competitive advantage. The bio-economy comprises "the production of renewable biological resources - such as crops, forests, fish, animals, and micro-organisms and the conversion of these resources and waste stream residues, by-products or municipal solid waste into value added products, such as food, feed, bio-based products and bioenergy" (European Commission, 2012). The transition to a more circular and bio economy, where the value of bio-based products, materials and resources is maintained in the economy for as long as possible, and the generation of waste is minimised, will provide an essential contribution to our national goal of developing a sustainable, low-carbon, resource efficient and competitive economy."*

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

| Reference | Description |
|---|---|
| **NPO 30** | *"Facilitate the development of the rural economy, in a manner consistent with the national climate objective, through supporting a* ***sustainable and economically efficient agricultural*** *and food sector, together with forestry, fishing and aquaculture,* ***energy*** *and extractive industries,* ***the bio-economy and diversification into alternative on-farm and off-farm activities****, while at the same time noting the importance of maintaining and protecting biodiversity and the natural landscape and built heritage which are vital to rural tourism."* [**Emphasis added**]. |

| | |
|---|---|
| **NPO 32** | *"Enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through the **diversification of the rural economy** into new sectors and services, including ICT-based industries and **those addressing climate change and sustainability**."* [**Emphasis added**]. |
| **NPO 67** | *"**Support the circular and bio economy** including in particular through greater efficiency in land and materials management, promoting the sustainable re-use and refurbishment of existing buildings and structures while conserving cultural and natural heritage, **the greater use of renewable resources** and by reducing the rate of land use change from urban sprawl and new development."* [**Emphasis added**]. |
| **NPO 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."* |

The Revised NPF also acknowledges the clear link between climate action and the potential for investment generation and employment and jobs, including green technology.

The Revised NPF has transitioned from an overarching climate policy of achieving a low carbon economy, to achieving a climate neutral economy and carbon neutral energy future: *"It is a national objective for Ireland to transition to be a competitive zero carbon, economy no later than 2050… . Government is committed to achieving climate neutrality no later than 2050 with a 51% reduction in GHG emissions by 2030. These legally binding objectives are set out in the Climate Action and Low Carbon Development (Amendment) Act 2021."*

The Revised NPF includes a section on 'Biomethane'. It states:

*"Biomethane is a carbon-neutral renewable gas made from farm and food waste through a process known as anaerobic digestion. A National Biomethane Strategy has been published63 which requires the development of policies with the primary objective of delivering the ambitious target of producing 5.7 TWh of indigenous biomethane by 2030.*

*It is estimated that over 80% of biomethane will be produced from grass silage and cattle slurry. This will require grass from 120,000ha (3% of total agricultural area) to produce the required feedstock.*

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

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

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

This section of the Revised NPF states that our transition to a zero carbon future requires a shift from predominantly fossil fuels to predominantly renewable energy sources and supports

development and deployment of new technologies relating to areas such as bio energy.

Section 9.2 states the following in relation to energy security: *"Gas will continue to play a key role to support the secure transition to an energy system, based on electrification and greatly increased renewables penetration. Ireland imports approximately three quarters of its gas from the UK and this is expected to increase as indigenous supply from the Corrib gas field declines.*

*The technical analysis shows that the existing infrastructure and supply sources are largely able to meet Ireland's gas demand requirements in the medium- to long-term. It also shows, however, that a disruption of gas supplies from the UK, for whatever reason, would have a very significant impact on Ireland's economic and social well-being. The Package is supported by an Annex "Securing Ireland's Gas Supplies" that sets out in more detail, the long-term approach to secure our gas security of supply. The report sets out a range of mitigation measures, including the need for additional capacity of indigenous renewable energy, but also energy imports, energy storage, fuel diversification, demand side response, and renewable gases."*

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

| Reference | Description |
|---|---|
| **NPO 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."* |
| **NPO 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."* |

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

**NPO 76:** *"Sustainably manage waste generation including construction and demolition waste, invest in different types of waste treatment and support circular economy principles, prioritising prevention, reuse, recycling and recovery, to support a healthy environment, economy and society."*

**Consistency with the National Planning Framework**

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

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

The energy sector must transition towards low-carbon and renewable sources to achieve the

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

The proposed development is strongly supported by, and is fully consistent with, the national policy objectives highlighted above. The development will deliver local employment and significant economic benefits in a rural area, while producing renewable biomethane and helping to improve the sustainability of the agricultural sector in the vicinity.

### 4.5.3 National Development Plan 2021 – 2030

The National Development Plan[12] ('NDP' hereafter) sets out the national capital investment priorities to realise the objectives of the NPF, proving a guide for national, regional, and local planning investment decisions from 2025-2023. The NDP recognises that public capital investment choices from 202 to 2030 must not only contribute to the objective of a 51% reduction in greenhouse gas emissions by 2030 but also lay the pathway to achieve the national climate objective of net-zero greenhouse gas emissions by 2050. The NDP states that significant investment is needed by the Department of Climate Energy and the Environment to fund projects and programmes that will support renewable energy development.

The NDP states, *"the allocations outlined in this document represent the continued focus and commitment of this Government to climate action and to ensuring Ireland is well positioned to realise the benefits of the transition to a green and sustainable economy."*

According to the NDP, in addition to the Exchequer allocations, €10 billion in equity and fund releases has been provided for the period to 2030 to support the delivery of large projects in the energy sector, including: *"€3.5 billion in equity funding is being provided to ESB and Eirgrid in 2025 to fund enhanced energy grid capacity to support the Government's housing and competitiveness objectives."*

The NDP states that *"The publication of the NDP in 2018 represented a step change in the Government's commitment to tackle climate change, which has carried forward into the subsequent NDPs, both in 2021 and the current NDP review."*

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

The NDP sets out 10 National Strategic Outcomes (NSOs) with Strategic Investment Priorities, with a particular emphasis on Climate Action and strengthening and developing rural

[12] Government of Ireland (2025) *National Development Plan Review 2025:* https://www.gov.ie/en/department-of-public-expenditure-infrastructure-public-service-reform-and-digitalisation/campaigns/project-ireland-2040/
[13] Government of Ireland (2021*) National Development Plan 2021-2030*: a36dd274-736c-4d04-8879-b158e8b95029.pdf (www.gov.ie)

economies and communities. The NSOs and Strategic Investment Priorities of particular relevance to the Proposed Development are outlined below:

| Reference | Description |
|---|---|
| **NSO 3 - Strengthen Rural Economies and Communities** | This outcome recognises the importance of rural communities and community engagement in achieving the goals of the NPF and NDP. The NDP highlights the role that rural economies and communities can play in responding to climate change across sectors and supports the sustainable development of Ireland's agri-food sector. For example, the On-Farm Capital Investment Scheme supports farmers looking to increase their environmental efficiency through, inter alia, the investment in and adoption of new technologies. |
| **NSO 8 – Transition to a Climate-neutral and Climate Resilient Society** | This outcome responds to the significant commitments by the Government to tackle the effects of climate change, reduce greenhouse gas emissions by 51% by 2030 (as compared to 2018 levels), and work towards achieving net-zero greenhouse gas emissions by 2050 in line with the Climate Action and Low Carbon Development (Amendment) Act 2021 (see below). The NDP recognises the special importance of the energy sector in achieving these targets, and that radical changes may be needed to reduce our reliance on fossil fuels:<br><br>*"Action in the energy sector will be critical to the achievement of Ireland's climate targets and the transformation to a high-renewable, net-zero emissions future. This will require a fundamental shift in the means by which we supply, store, and use energy."*<br><br>The NDP also recognises the continued need for the supply and use of gas in Ireland, particular with regards to ensuring security of energy supply. Underpinning this theme is a commitment to a just transition, to ensuring that all people are able to participate in and benefit from the decarbonisation of economy:<br><br>*"A key focus of this investment is to support the transition of the existing workforces and the creation of new enterprise and employment opportunities so that the region remains vibrant, innovative and makes the most of the opportunities that decarbonisation will bring."* |
| **NSO 9 – Sustainable Management of Water and Other Environmental Resources** | This outcome highlights the need for investment in the environmental resources and infrastructure Ireland, with a particular focus on the sustainable management of waste and water. This theme is supported by the whole-of-government Circular Economy Strategy (see below) as recognises that investments in waste management is critical to achieving an environmentally and economically sustainable future:<br><br>*"While the overall focus of Government waste policy is on prevention and waste minimisation, investment in indigenous waste treatment capacity remains critical to our environmental and economic well-being."*<br><br>AD facilities, such as the Proposed Development, are highlighted as one investment opportunity to achieve this NSO:<br><br>*"Capacity will continue to be built in waste facilities, **including anaerobic digestion**, hazardous waste treatment, plastics processing, recycling, waste to energy, and landfill and landfill remediation, to meet future waste objectives."* [**Emphasis added**]. |

**Consistency with the National Development Plan**

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

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

### 4.5.4 Climate Action Plan

The development directly addresses and will assist in achieving the aims of section 15 of the Climate Action and Low Carbon Development Act 2015, as amended, in that it will contribute to the furtherance of the national climate objective and the most recent approved climate action plan and national long term climate strategy.

The 2025 Climate Action Plan[14] ('CAP25' hereafter) was published on the 15th of April 2025 and is the third statutory annual update to Ireland's Climate Action Plan under the Climate Action and Low Carbon Development (Amendment) Act 2021.

CAP25 builds upon last year's Plan (CAP24) by refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings. The Plan provides a roadmap for taking decisive action to halve Ireland's emissions by 2030 and reach net zero by no later than 2050, as committed to in the Climate Action and Low Carbon Development (Amendment) Act 2021.

The Proposed Development directly contributes to the achievement of objectives within the CAP25, including the objective to achieve the production of up to 5.7 TWh of Biomethane by 2030.

The CAP25 states that *"agriculture remains the highest-emitting sector with 3.4% of $CO_{2e}$eq".*

Section 15 'Agriculture' of the CAP25 states the following in relation to Biomethane:

*"2024 saw the publication of the National Biomethane Strategy and the launch of grant aid towards development of the sector. This is expected to drive expansion of the anaerobic digestion sector towards the target of 5.7 TWh by 2030."*

The Proposed Development will contribute directly to the achievement of this target of CAP25.

The swift deployment of biomethane production in the state was similarly a key objective of the CAP24 (which Government note should be read in conjunction with the new CAP25), in order to meet the ambitious targets set for 2025 and 2030. The urgency of reducing agricultural emissions is acknowledged in CAP25, which states that *"Although agricultural emissions have decreased, they remain above the proposed pathway outlined in Climate Action Plan 2024."*

[14] Dept of the Environment, Climate and Communications (April 2025) *CAP25*: Climate Action Plan 2025

**Consistency with the CAP**

The Proposed Development directly contributes to the realisation of the aims and objectives of the Climate Action Plan as outlined above. The swift deployment of biomethane production in the state is a key objective of the CAP25, in order to meet the ambitious targets set for 2025 and 2030.

The Proposed Development will also assist in achieving the steep emissions reductions required if the agricultural sector is to meet its sectoral emissions targets for 2025 and 2030.

The roll-out of biomethane production is rendered all the more urgent having regard to the recently published EPA projections on Ireland's Greenhouse Gas Emissions 2024 to 2050 (published in May 2025), which warn that Ireland is currently likely to miss both its first and second carbon budget targets, in the absence of additional measures. The timely rollout of additional renewable energy generation will assist in achieving current targets, and reduce the risk of steeper emissions reductions being required in later years to achieve 2030 targets.

### 4.5.5 Sectoral Emissions Ceilings

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

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

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

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

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

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

### 4.5.6 Climate Action and Low Carbon Development Acts 2015 and 2021

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

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

environmentally sustainable economy by 2050.

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

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

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

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

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

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

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

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

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

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

- *(h) the fact that the means of achieving a climate neutral economy and other measures to enable the State to pursue the national climate objective may not yet be fully identified and*

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

*may evolve over time through innovation, evolving scientific consensus and emerging technologies;*

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

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

*"(1) A relevant body shall, in so far as practicable, perform its functions in a manner consistent with—*

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

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

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

**Consistency with Climate Action Plan**

The objectives of the CAP25 (which is now the current most recent approved climate action plan) which the Proposed Development will support have been set out above.

**Consistency with Long Term Climate Action Strategy**

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

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

The Strategy states:

[17] Long-term Strategy on Greenhouse Gas Emissions Reductions 2023. https://www.gov.ie/en/publication/e4e81-long-term-strategy-on-greenhouse-gas-emissions-reductions/
[18] Long-term Strategy on Greenhouse Gas Emissions Reductions 2024. https://www.gov.ie/en/publication/e4e81-long-term-strategy-on-greenhouse-gas-emissions-reductions/#:~:text=Ireland%E2%80%99s%20Long-term%20Strategy%20on%20Greenhouse%20Gas%20Emissions

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

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

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

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

**Consistency with Approved National Adaptation Framework and Approved Sectoral Adaptation Plans**

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

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

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

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

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

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

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

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

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

**Furtherance of the National Climate Objective**

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

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

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

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

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

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

### 4.5.7 Support Scheme for Renewable Heat (SSRH)

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

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

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

*"Gas Networks Ireland registers and issues certificates to Irish producers that inject renewable gas into the gas network. This includes biomethane, which is a renewable gas produced by anaerobic digestion of biodegradable matter that is then upgraded to network entry specifications prior to injection. Each certificate represents our guarantee that the equivalent amount of renewable gas has been injected into the gas network."*[20]

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

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

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

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

*"Bioenergy is a versatile source of energy that can be used for heating, transport, and power generation. The most advantageous economic benefits arise when it is used for heating. Bioenergy encompasses a range of fuels in solid, liquid, and gaseous forms, including forest-*

[19] Department of the Environment, Climate and Communications (2019) *Support Scheme for Renewable Heat (SSRH):* gov - Support Scheme for Renewable Heat (SSRH) (www.gov.ie)
[20] Gas Networks Ireland, *Renewable Gas Certification:* Renewable gas certification (gasnetworks.ie)
[21] Department of Environment, Climate and Communications (2020) *The White Paper:* Department of Communications, Energy and Natural Resources - Ireland's Transition to a Low Carbon Energy Future - 2015-2030 - e5aa9f25-da81-43eb-804d-57309615681e.pdf (www.gov.ie)

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

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

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

### 4.5.9 Biomethane Energy Report – Gas Networks Ireland

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

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

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

- *Biomethane is produced with existing technology and can therefore be rapidly scaled up. It can also be transported, stored, and distributed through existing gas grids."*

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

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

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

### 4.5.10 Energy Security in Ireland to 2030

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

Energy Security in Ireland to 2030 outlines a new strategy to ensure energy security in Ireland for this decade, while ensuring a sustainable transition to a carbon neutral energy system by 2050. This report is being published as part of an Energy Security Package, containing a range of supplementary analyses, consultations, and reviews, which have informed the recommendations and actions related to energy security.

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

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

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

### 4.5.11 National Policy Framework on Alternative Fuels Infrastructure for Transport in Ireland

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

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

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

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

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

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

The roadmap recognises that the agriculture sector has a key role to play in the provision for bio-energy feedstocks for the production of biogas/biomethane as a key renewable energy resource for the decarbonisation of the transport and heat sectors in particular.

### 4.5.13 National Energy and Climate Plan (NECP) 2021-2030

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

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

The NECP stated the following:

*"In the absence of certainty in relation to the mechanism by which biomethane will be supported, it is proposed to set an indicative target which will be reviewed in 2023 as part of the*

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

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

*review process for the National Energy and Climate Plan. This review will take into account the development of supports and market development for biomethane and progress towards the indicative target. The indicative target for indigenous biomethane is therefore set at 1.6 TWh and will be reviewed in 2023."*

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

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

This represents a significant uplift in the targeted level of biomethane production by 2030 vis a vis the National Energy and Climate Plan. The 5.7TWh is retained in the 2025 CAP.

### 4.5.14 The Planning and Development Act 2000 (as amended)

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

- reduce energy demand in response to the likelihood of increases in energy and other costs due to long-term decline in non-renewable resources,
- reduce anthropogenic greenhouse gas emissions, and
- address the necessity of adaptation to climate change; in particular, having regard to location, layout, and design of new development.

The Planning and Development Act, as amended also transposes the requirements of the EIA Directive and provides the framework within which the Planning Authority, as competent authority, will undertake EIA of the current development proposal.

### 4.5.15 Whole of Government Circular Economy Strategy 2022 – 2023

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

The Strategy states:

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

[26] *Planning and Development Act 2000:* Planning and Development Act, 2000 (irishstatutebook.ie)
[27] Department of Environment, Climate and Communications (2021) *Whole of Government Circular Economy Strategy 2022-2023:* bd90130d-494e-4d32-8757-46d36c77b912.pdf (www.gov.ie)

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

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

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

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

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

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

We note in particular the following:

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

### 4.5.17 National Policy Statement on the Bioeconomy (2018)

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

### 4.5.18 Common Agricultural Policy (CAP) Strategic Plan 2023 – 2027

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

[28] Government of Ireland (2020) *A Waste Action Plan for a Circular Economy: Ireland's National Waste Policy 2020-2025:* *dcf554a4-0fb7-4d9c-9714-0b1fbe7dbc1a.pdf (www.gov.ie)*
[29] Government of Ireland (2018) *National Policy Statement on the Bioeconomy:* gov - National Policy Statement on the Bioeconomy (www.gov.ie)
[30] Department of Agriculture, Food and the Marine (2020) *The CAP Strategic Plan 2023-2027*: gov - The CAP Strategic Plan 2023 - 2027 (www.gov.ie)

### 4.5.19 European Union (Waste Directive) Regulations 2020[31]

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

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

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

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

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

### 4.5.21 Animal By-Products Regulations

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

Document 'CN11 – Conditions for Approval and Operation of Biogas Plants Transforming Animal By-Products and Derived Products in Ireland' provides details on the requirements of a biogas plant such as that proposed here. These include general requirements including animal

[31] Gov. of Ireland: *European Union (Waste Directive) Regulations 2020:* S.I. No. 323/2020 - European Union (Waste Directive) Regulations 2020 (irishstatutebook.ie)
[32] Gov. Of Ireland (2013) *Environmental Protection Agency (Industrial Emissions) (Licensing) Regulations 2013:* S.I. No. 137/2013 - Environmental Protection Agency (Industrial Emissions) (Licensing) Regulations 2013. (irishstatutebook.ie)
[33] *Waste Management Act, 1996:* Waste Management Act, 1996 (irishstatutebook.ie)
[34] *Environmental Protection Agency Act, 1992:* Environmental Protection Agency Act, 1992 (irishstatutebook.ie)
[35] *S.I. No. 137/2013:* S.I. No. 137/2013 - Environmental Protection Agency (Industrial Emissions) (Licensing) Regulations 2013. (irishstatutebook.ie)
[36] Gov. of Ireland: *Waste Management (Facility Permit and Registration) Regulations 2007*: S.I. No. 821/2007 - Waste Management (Facility Permit and Registration) Regulations 2007 (irishstatutebook.ie)
[37] *European Union (Animal By-Products) Regulations 2014:* S.I. No. 187/2014 - European Union (Animal By-Products) Regulations 2014. (irishstatutebook.ie)

by-product feedstocks, structural and equipment requirements, plant operational requirements, requirements for microbiological testing, Plant HACCP Plans and Plant Pre-requisite Programmes (PRPs), and record keeping requirements.

## 4.6 Regional Planning Policy

### 4.6.1 Regional Spatial and Economic Strategy for the Northern and Western Region

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

The RSES acknowledges that the effects of climate change will be felt in the environment, society, and economy of the Northern and Western Region. A key 'Growth Ambition' of the RSES is the 'Natural Ambition': *"It has been identified that more strategic actions are required to prepare the region for what is to come and highlights the need to create a combined long term vision for the future of both energy supply and our ability to use renewable energy. To address our energy requirements our RSES emphasises the need for coordination, new thinking, investment, and skills to implement change. All considerations need to be cognisant of our natural resources, landscape, and heritage (natural, social, and cultural)".*

The following objectives are of particular relevance to the proposed development:

| Reference | Regional Policy Objectives |
|---|---|
| **RPO 5.5 (Natural Assets)** | Ensure efficient and sustainable use of our natural resources. |
| **RPO 8.6 (Gas Networks)** | Facilitate the delivery and expansion of natural gas infrastructure throughout the region and have regard to the location of existing gas infrastructure in assessing potential developments. |
| **RPO 8.7 (Gas Networks)** | Encourage and support innovative partnerships extending the gas network in the region, including the potential for gas to grid injection facilities along with anaerobic digestion facilities. |
| **RPO 4.27 (The Bioeconomy)** | It is an objective to support the National Policy Statement on the Bioeconomy (2018), and the exploration of opportunities in the circular resource-efficient economy, including undertaking a bioeconomy feasibility study for this region. This feasibility study will aim to identify (and map) areas of potential growth to inform the National Transition Agenda, enabling a Low Carbon, resilient nation. |
| **RPO 4.28 (The Bioeconomy)** | To support the potential creation of appropriately scaled local multi-feedstock bio-refining hubs across the region as well as potential creation of bio-districts/clusters. |
| **RPO 4.29 (The Bioeconomy)** | The Assembly supports the future-proofing of infrastructure planning to allow for the potential upgrading of existing industrial sites to bio-refining plants while also supporting the use of bio-renewable energy for the sustainable production of bio-based products. |

[38] Northern and Western Regional Assembly (2022) *Regional Spatial and Economic Strategy:* RSES | Northern and Western Regional Assembly (nwra.ie)

**Consistency with the Regional Spatial and Economic Strategy**

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

AD facilities apply the principles of the bioeconomy and circular economy, by utilising biomass as a resource for the use and long-term security of renewable energy across the region.

Such facilities also contribute to the competitiveness of the agricultural sector, by encouraging the use of green technologies and other mitigation / adaptation opportunities. The development will have a positive impact on the rural and bio economy. A such, this proposal is compliant with and supported by the RSES for the Northern and Western Region.

The RSES directly support the expansion of the gas grid and the delivery of anaerobic digestion facilities such as that which is now proposed. The Proposed Development is fully consistent with the objectives of the RSES for the Northern and Western Region.

## 4.7 Local Planning Policy

### 4.7.1 Galway County Development Plan

The Galway County Development Plan 2022-2028[39] ('CDP' hereafter) was adopted on the 9th May 2022 and came into effect on the 20th June 2022. The CDP recognises the central role of land use planning in promoting a low carbon society, mitigating the impact of climate change, and progressing towards a sustainable energy future for County Galway. The CDP aligns with the NPF, by recognising the role that rural areas play in driving the economy, for example by attracting entrepreneurship and innovation development, particularly where low carbon outputs can be achieved. The Vision of the CDP is:

*"The promotion of a balanced urban and rural county that ensures future growth is based on the principles of sustainable development, delivering a high-quality living and working environment meeting the needs of all residents."*

Climate Change and Environmental Sensitivity is a 'Key Principle' of the CDP. At Section 2.3.13 (Key Principles), the CDP states, *"Climate Change has an increasing role to play in how the county is planned in the future. The plan has a critical role to play in ensuring the communities develop having regard to sustainable infrastructure networks which build resilience to climate change."*

The Proposed Development will contribute to achieving the vision and guiding principles of the CDP creating a rural-based enterprise that produces renewable energy in a manner which directly benefits the local community and economy, while also helping to decarbonise the agricultural sector in the locality. This will help to achieve the stated aims of the Development Plan relating to economic development and employment, renewable energy developments, and measures to promote resilience to and mitigation of climate change.

[39] GCC (2022) *CDP*: https://consult.galway.ie/en/consultation/adopted-galway-county-development-plan-2022-2028

#### 4.7.1.1 Zoning and Designation Specific to the Site

The Site comprises agricultural land and is not subject to any specific zoning objective under the CDP. Ballinasloe town Local Area Plan (2022-2028) is located c. 2.3km north of the Site (at the M6 Motorway) and the centre of Ballinasloe town is located c. 3.9km north. Ballinasloe town is designated as a 'Key Town' under the CDP. Key Towns are defined within the CDP as *"Towns that are regionally strategic employment centres of significant scale that can act as regional drivers that complement and support the higher order areas within the settlement hierarchy."*

The lands are outside any settlement boundary, which is appropriate for the nature of use proposed. As noted previously, the National Biomethane Strategy, which is directly referred to and supported by the National Planning Framework, specifically recognises the fact that *"Due to the nature of feedstocks required for biomethane production, it is envisaged that most developments will occur in rural Ireland"* (emphasis added). AD facilities such as that proposed are intrinsically linked with the rural area in which they are situated, based on the requirement to source agricultural feedstock from proximate farms, and to provide digestate to farms within a local catchment.

The site of the Proposed Development, which is within a rural area in line with the provisions of the Strategy, seeks to deliver biomethane production in a location that provides access to necessary feedstock sources in proximity to the site, while minimising environmental impact and allowing for connection to the gas grid. Additionally, the site is located adjacent to an existing commercial use (a meat processing plant). That facility will not be connected to the AD facility in any way operationally, however it does demonstrate the suitability of the location for a use which is connected to the wider agricultural area in terms of feedstock and digestate sourcing and use.

**Landscape Character Area**

According to Volume 1, Appendix 4, Map 01(Landscape Character Type) of the CDP, the Site is located within the 'Shannon Environs Landscape'. This landscape type is a *"nationally significant ecological, scenic and recreation assessment asset".* This landscape is *"very sensitive to any form of development or change of management regime."*

The EIAR which accompanies the application includes a detailed landscape and visual impact assessment chapter, which includes an analysis of intervisibility between the Proposed Development and relevant landscape features, monuments, and structures. The development incorporates extensive design-based mitigation of visual and landscape impact, via the inclusion of a robust buffer of landscaping, berms, and tree / woodland planting around the site boundary.

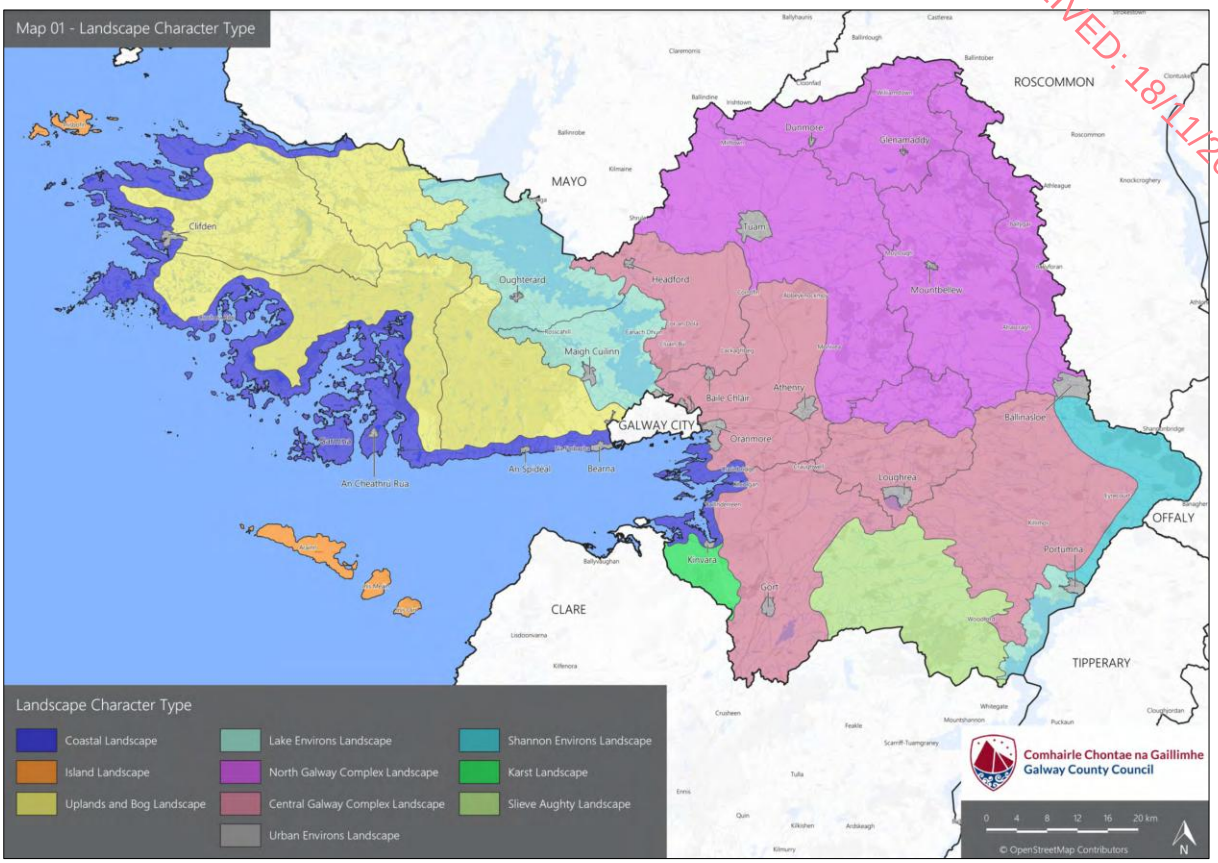


**Figure 4.7:** CDP Landscape Caracter Types Map [Source: CDP, Appendix 4, Map 01]

### 4.7.1.2 Chapter 4: Rural Living and Development

The CDP Goal for 'Rural Living and Development' is: *"Support the role of rural areas in maintaining a stable population base through a strong network of villages and small towns and strengthening rural communities by supporting a resilient rural economy and the sustainable management of land and resources."*

According to Section 4.2, it is a Strategic Aim of this Chapter: *"To support local rural economies and facilitate the diversification of local rural enterprises."*

We note the following Policy Objectives for Rural Living and Development:

- **Policy Objective RD 1 (Rural Enterprise Potential):** *"To facilitate the development of the rural economy through supporting a sustainable and economically efficient agriculture and food industry, together with forestry, fishing and aquaculture, energy and extractive industries, the bio-economy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism. Development of Cafes, Art Galleries, Hot Desk Facilities etc. which are important to the rural economy."*
- **Policy Objective AD 1 (Sustainable Agriculture Practices):** *"To facilitate the development of sustainable agricultural practices and facilities within the county, subject to complying with best practice guidance, normal planning and environmental criteria*

*and the development management standards in Chapter 15 Development Management Standards."*

- **Policy Objective AD 4 (Agriculture Waste):** *"To ensure agricultural waste is managed and disposed of in a safe, efficient and sustainable manner having regard to the environment and in full compliance with the European Communities Good Agricultural Practice for the Protection of Waters Regulations (2014) and relevant best practice guidelines."*

Section 49 (Agri-Diversification) states, *"It is Council policy to facilitate the development of the rural economy through supporting sustainability and economic efficiency in agriculture and diversification into alternative on-farm and off-farm activities such as… **renewable energy and the bio-economy**".* [**Emphasis added**].

Section 4.13 'Commercial Developments in Rural Areas' states, that rural businesses and enterprises are an important source of local employment in the County.

The Proposed Development of an anaerobic digestion facility promotes the diversification of the rural economy and farm diversification, to produce renewable energy and organic fertiliser from agricultural wastes. It will contribute to the circular and bioeconomy by utilising agricultural waste to produce biogas, a renewable gas. The proposal enhances the sustainability and diversification of the County's agricultural sector, and therefore is supported by Chapter 4 of the CDP.

#### 4.7.1.3 Chapter 7: Infrastructure, Utilities and Environmental Protection

Section 7.6 'Waste Management' states, *"Some of the key measures for local authorities and industry contained in the plan can be summarised as follows:*

- *Plan and develop higher quality waste treatment infrastructure including new reprocessing, biological treatment, thermal recovery and pre-treatment facilities;*
- *Grow the biological treatment sector, **in particular** composting and **anaerobic digestion**, **by supporting the development of new facilities**;".* [**Emphasis added**].

We note the following Policy Objectives of Chapter 7:

- **Policy Objective WM 3 (Waste Recovery and Disposal Facilities): "***Support and facilitate the provision of adequate waste recovery and disposal facilities for the county."*
- **Policy Objective EG 2 (Delivery of Electricity and Gas Infrastructure):** *"Support the provision and extension of electricity and gas transmission networks within the county which are critical to the economic development of the County subject to environmental quality, landscape, wildlife, habitats or residential amenity."*

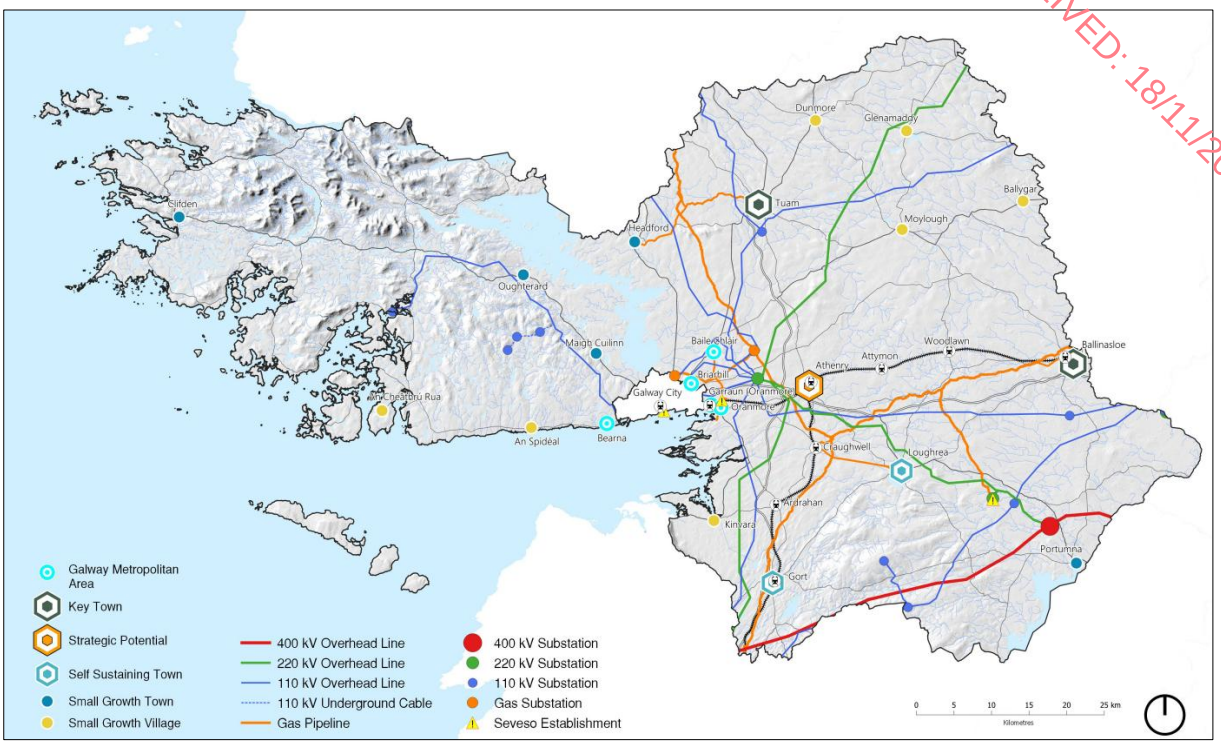


**Figure 4.8:** Map of Utilities Infrastructure [Source: CDP, Chapter 7, Figure 7.1 'Map of Utilities Infrastructure']

According to this Map, a gas pipeline runs through the town of Ballinasloe.

The Proposed Development of an anaerobic digestion facility is an example of high quality renewable energy infrastructure, producing renewable gas (Biomethane) and a bio-based fertiliser.

#### 4.7.1.4 Chapter 14: Climate Change, Energy and Renewable Resource

The Goal for Climate Change, Energy and Renewable Resource is: *"To reduce the carbon footprint by integrating climate action into the planning system in support of national targets, support indigenous renewable sources in order to reduce dependence on fossil fuels and improve security of supply and the move to a competitive low carbon economy."*

We note the following Strategic Aims of this Chapter:

- *"To reduce the County's CO2 emissions by achieving international, national, regional and any local targets for achieving a low carbon economy by 2050; and increase energy efficiency in Local Authority activities through its development management functions".*
- *"To reduce County Galway's dependency on imported fossil fuels and to provide alternative energy sources by harnessing the County's potential for renewable energy sources while strengthening the grid transmission networks".*

It is a mineral/waste climate mitigation measures to *"Locate developments strategically (e.g. waste materials) to minimise the need to travel, subject to health aspects/business needs".*

It is an Agriculture climate mitigation measure to *"Support production of sustainable biofuels (farm contributions to localised energy supplies – biofuels/wind energy production)".*

We note the following Policy Objectives of the CDP:

- **Policy Objective CC 1 (Climate Change):** *"Support and facilitate the implementation of European, National and Regional objectives for climate adaptation and mitigation taking into account other provisions of the Plan (including those relating to land use planning, energy, sustainable mobility, flood risk management and drainage) and having regard to the Climate mitigation and adaptation measures."*
- **Policy Objective CC 2 (Transition to a low carbon, climate-resilient society**): *"It is a policy objective of the Planning Authority to support the transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050, by way of reducing greenhouse gases, increasing renewable energy, and improving energy efficiency."*
- **Policy Objective CC 3 (County Galway Climate Adaptation Strategy 2019-2024):** *"To implement the County Galway Climate Adaptation Strategy 2019-2024 as appropriate."*
- **Policy Objective CC 4 (Local Authority Climate Action Plan):** *"Support the preparation of a Climate Action Plan for County Galway."*
- **Policy Objective CC 6 (Local Authority Renewable Energy Strategy (LARES)):** *"To support the implementation of the Renewable Energy Strategy contained in Appendix 1 of the Galway County Development Plan to facilitate the transition to a low carbon county."*
- **Policy Objective CC 7 (Climate Action Fund):** *"Support the delivery of sustainable development projects under the European Green Deal and utilise the Climate Action Fund/ Just Transition Fund established under the National Development Plan to encourage public and private climate mitigation and adaptation projects in line with criteria set out by the Fund at that time."*

Section 14.7 (Energy and Renewable Resource) states:

*"Ireland remains heavily dependent on fossil fuels and there is currently a need to import two thirds of the country's energy needs at a significant financial cost to the economy and the environment. The main trends in the national energy fuel share for Ireland in 2019 were outlined by SEAI as follows;*

- *Fossil fuels accounted for (87%) of primary energy used in 2019 which included Oil accounting for 49% of the total primary energy requirement, Natural Gas 31%, Coal 2.6% Peat 4.3%.*
- *Renewables are disaggregated into wind, hydro, biomass and other renewables which in total accounted for 11% of primary energy."*

Section 17.7.2 (Energy Strategy) states, *"An efficient and secure energy supply is essential to the future growth and sustainable development of County Galway. Reliable and low-cost energy is essential for a high quality of life for the residents of County Galway and also to ensure that the County is an attractive place in which to do business. However, it is essential to ensure that energy demands are met without compromising environmental quality. Energy efficiency, renewable energy development and progression towards a low carbon economy are therefore central themes of this Plan."*

We take note of the following energy expectations for Galway to 2028, according to Section 17.7.2:

- *"A reduction in demand for non-renewable energy sources, such as coal and oil, as well as an increased demand for electricity from all sectors, leading to more sustainable energy usage across the county."*
- *"Natural gas will continue to have a role to play in the transition to a low carbon economy."*
- *"In the longer-term fossil fuels will be replaced by renewable energy sources in County Galway in line with the Strategy for Renewable Energy 2012 – 2020 which is aimed at decoupling energy from reliance on fossil fuels."*
- *"The implementation of the targets and policy objectives outlined in the Renewable Energy Strategy which has been prepared for County Galway as part of the County Development Plan is contained within Appendix 1."*

Section 17.7.3 (Electricity and Gas Networks) states, *"The Gas network plays a key role as part of the supporting infrastructure for renewable energy developments. Gas will play an important part of Ireland's energy economy for the foreseeable future.*

*Even with a clear move towards renewable energy in the growing electricity sector, Ireland is likely to rely on natural gas for about one-third of electricity generation in 2030 to support the transition to a low carbon economy. By this date, Ireland will be reliant on imported gas or gas generated from innovations in indigenous gas manufacturing."*

This Section further states, *"The NDP identifies existing gas pipeline connections serving Galway City, Craughwell, Tuam, Gort, Tynagh, Loughrea, Ballinasloe and Headford. This demonstrates that there is an established gas transmission network in County Galway capable of supporting renewable energy development across various parts of the County. Ireland owns and operates the gas transmission pipeline running from north to south through County Galway and the adjoining wayleaves"*

We note the following Electricity and Gas Network Policy Objectives:

- **Policy Objective EG 1 (Gas Network and Generating Capacity):** *"To support the development of the gas network and associated generating capacity in order to sustainably support and augment renewable electrical energy generated in County Galway."*
- **Policy Objective EG3 (Natural Gas and Synthetic Networks):** *"To facilitate the delivery and expansion of the Natural Gas and Synthetic Gas infrastructure for storage, transmission and energy generation throughout the County for both domestic and business/industry use and to have regard to the location of existing gas infrastructure pipeline in the assessment of planning applications."*

We note the following Renewable Energy Policy Objectives:

- **Policy Objective RE1 (Renewable Energy Generation and ancillary facilities):** *"To facilitate and support appropriate levels of renewable energy generation and ancillary facilities in the county to meet national, regional and county renewable energy targets, to facilitate a reduction in CO2 emissions and the promotion of a low carbon economy."*
- **Policy Objective RE 2 (Local Authority Renewable Energy Strategy):** *"The policy objectives and Development Management Standards set out in the Local Authority Renewable Energy Strategy for County Galway shall be deemed the policy objectives and development management standards for the purpose of the Galway County Development Plan 2022-2028."*

- **Policy Objective RE 5 (Renewable Energy Strategy):** *"Support and facilitate the sustainable development and the use of appropriate renewable energy resources and associated infrastructure within the County having due regard to the Habitats Directive and to the detailed policy objectives and Development Standards set out in the Local Authority Renewable Energy Strategy as follows: Bioenergy/Anaerobic Digestion".*
- **Policy Objective RE 7 (Renewable Energy Generation -Transition to a Low Carbon Economy):** *"To facilitate and support appropriate levels of renewable energy generation in County Galway, considering the need to transition to a low carbon economy and to reduce dependency on fossil fuels."*

The Proposed Development will support the climate change, energy and renewable resource objectives of the CDP. The proposal consists of a rural-based renewable energy development, deriving its source material from agricultural wastes and feedstock, whilst also providing an organic fertiliser which will be provided to local farms. This proposal will reduce the County's $CO_2$ emissions and dependency on imported fossil fuels.

The proposal is located strategically in a rural area surrounded by farms that can provide the source material, reducing associated travel distances. This proposal will support the transition to a low carbon, climate resilient and environmentally sustainable economy, reducing greenhouse gas emissions by producing renewable gas, increasing renewable energy, and improving energy efficiency.

#### 4.7.1.5 Chapter 5: Economic Development, Enterprise and Retail Development

Section 5.8 of the CDP (Sectors, Clusters and Employment Opportunities) states that renewable energy and a low carbon future and agri-tech and agri-food are some of the emerging sectors most important to the County.

This Section states that *"The development of this circular bioeconomy industry where bio products are used for a range of purposes reduce waste levels and enable rural Ireland to contribute to a low carbon, climate resilient society as set out in the NPF. This approach makes use of new technologies and requires a new way of thinking. Given the contribution that the circular and bioeconomy can make to Ireland's carbon reduction, it is considered that this sector should be supported where appropriate a sentiment that is supported by the NWRA."*

According to Map 5.1 of the CDP, the Site is located within the 'Economic Engine'.

We note **Policy Objective SCO 3** (Agri-food Industry and Rural Diversification), which states, *"Support the development of the agri-food industry and rural diversification in a sustainable manner across County Galway facilitating research and development where appropriate."*

#### 4.7.1.6 Chapter 15: Development Management

This chapter of the CDP sets out the development standards and criteria to ensure development occurs in an orderly and efficient manner.

Section 15.3.4 (Rural Enterprise), **DM Standard 17** states, *"The Council will consider rural enterprises, and resource development (such as agriculture, agri-food sector, agri-tourism, commercial fishing, aquaculture, marine tourism, forestry, bio-energy, the extractive industry, recreation, cultural heritage, marine enterprise sector, research and analysis) and renewable*

*energy resources (such as wind/ocean energy) in rural and coastal areas within the County subject to considerations of proper planning and sustainable development and shall include the following:*

*b) Agriculturally Related Industry*

*New buildings will be considered in rural areas for the provision of agricultural related locally sustainable industry."*

According to this development management standard, the following information shall accompany any application:

- *The type of business proposed;*
- *The nature and extent of the work;*
- *Reason for its location (e.g., justification on why it is not proposed within settlement centre, etc.);*
- *Anticipated levels of traffic generated by the proposal, accessibility, and car-parking;*
- *The effects on the amenities of the adjoining occupiers particularly in relation to hours of work, noise and general disturbance;*
- *Whether the proposal requires delivery/shipment of goods and details of same;*
- *Arrangements for storage and collection of waste. (Materials used or goods manufactured, serviced or repaired in the home-based business must be stored within a building).*
- *No goods manufactured, serviced or repaired should be displayed so that they are visible from outside the site.*
- *Should not have any adverse impacts on the amenities of neighbouring dwellings."*

We note **DM Standard 27** (Access to National and Other Restricted Roads for Commercial & Other Developments), which states, *"Commercial development along National Roads and Other Restricted Roads will be restricted outside the defined settlement centres or the Local Area Plan boundaries as follows:*

*b) Class II Control Roads (Regional Road) Commercial, industrial and community facilities development and land use shall be restricted to essential needs, in the particular locality, of agriculture, tourism infrastructure, fisheries, forestry, park and ride facilities or existing extractive industries, and where these cannot be in the opinion of the Planning Authority, be reasonably located along other non-listed regional or local roads. All restricted regional roads are included under the Class 2 Control Roads designation. Restricted Regional Roads are listed hereunder:"*

The R355 regional road, located northeast of the Site is included in this list. However, the development does not include any direct access onto this regional road, and the TTA prepared by ORS, following consultation with the roads engineers of Galway County Council, details that the development will not prejudice the safety, capacity, or operation of the regional road.

We take note of the following Development Management Standards:

- **DM Standard 28** which relates to sight distances required for access onto National, Regional, Local and Private Roads.
- **DM Standard 31:** Parking Standards. For industry developments, 1 car parking space per 33 sq.m of gross floorspace shall be provided. 1 bike space shall be provided for

every car space. In relation to accessible parking, 1 space shall be provided within 5-25 spaces. EV car parking spaces shall be provided at a rate of up to 20% of the total car parking spaces.
- **DM Standard 33:** Traffic Impact Assessment, Traffic & Transport Assessment, Road Safety Audit & Noise Assessment.
- **DM Standard 34:** Mobility Management Plans.
- **DM Standard 36:** Public Water Supply and Wastewater Collection.
- **DM Standard 38:** Effluent Treatment Plants.
- **DM Standard 39:** Construction and Demolition Waste.
- **DM Standard 46:** Compliance with Landscape Sensitivity Designations.
- **DM Standard 47:** Field Patterns, Stone Walls, Trees and Hedgerows.
- **DM Standard 50:** Environmental Assessments.
- **DM Standard 58:** Protected or Proposed Protected Structures.
- **DM Standard 61:** Archaeological Conservation and Preservation (Urban & Rural Areas).
- **DM Standard 67:** Sustainable Drainage Systems' (SuDS).

Section 15.13.3 relates to the development management of 'Renewable Energy Proposals'. This Section provides DM Standards for wind and solar developments, but not biomethane development, which is considered to be adequately addressed by the standards above.

***Statement of Consistency with the CDP***

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

The proposal seeks to utilise the waste agricultural resources of the local area in an environmentally acceptable manner, consistent with the CDP's support of the development of the circular economy and bioeconomy.

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

The Proposed Development supports the progression of the rural economy, the reduction of agricultural waste and pollution, the transition to renewable gases and the transition to renewable energy (of which energy intensive sectors such as agriculture are promoted to transition in the CDP).

### 4.7.2 Galway County Council Climate Action Plan 2024-2029 (GCAP)[40]

The GCAP was adopted on 19th February 2024. According to the GCAP, agriculture accounted for 44% of emissions (2019).

[40] GCC (2024) *GCAP*: https://consult.galway.ie/en/system/files/materials/8797/Galway%20County%20Council%20Local%20Authority%20Climate%20Action%20Plan%202024-2029_0.pdf

We note the following **Strategic Goal (Energy and Built Environment):** *"Energy and Built Environment: Transform to low-carbon, resilient and sustainable energy and buildings, enhancing the well-being of our community".* **Objective EB1** to support this goal is to *"Support the development of renewable energy sources, such as offshore wind only, solar, tidal, and biomass in suitable location."*

We note the following **Strategic Goal** (Circular Economy): *"Promote and support a circular economy to reduce waste, conserve resources and enhance sustainability."* We note the following objectives to support this goal:

- **Objective CE1:** *"Support communities, businesses and individuals to reduce the generation of waste and increase the quantity of waste reused and recycled."*
- **Objective CE2:** *"Ensure waste is properly managed and reduce the quantity of waste that is sent to landfill or incinerated."*

### 4.7.3 Galway County Council Local Authority Renewable Energy Strategy[41]

The Local Authority Renewable Energy Strategy ('LARES' hereafter) was adopted in 2024, within Appendix 1 of the CDP.

CDP **Policy Objective CC6** states: *"To support the implementation of the Renewable Energy Strategy contained in Appendix 1 of the Galway County Development Plan to facilitate the transition to a low carbon county."*

According to Map 1 of the LARES, at the time the CDP was published, there were 5 Biomass planning applications made to GCC:

- 18/502: Refused: Withdrawn 14/12/2018 - Biogas Plant - Gort, Kinincha & Glenbrack.
- 19/1812: Refused 24/01/2020 – Biogas Plant – Townlands of Ballynamantan, Kinincha and Glenrack.
- 13/356: Refused 29/07/2013 – Anaerobic Digestion Biogas Plant – Cloontoa.
- 11/1729: Withdrawn 11/04/2013 – AD Facility – Airlooney Business Park.
- 14/1197: Granted 16/02/2015 – "*to (1) dismantle existing storage warehouse (2) erect woodchip storage warehouse (3) erect building to house biomass boiler (4) erect building for 4 no. kilns. (gross floor space woodchip storage 133sqm; boiler 480sqm; Kilns 407sqm)".* Located at Hermitage.

The Vision for the LARES is: *"To facilitate and encourage renewable energy generation and a low carbon energy transition across County Galway, in the interests of future generations, through the application of energy efficient technology and the harnessing of indigenous renewable energy resources, whilst respecting the need to conserve areas of environmental, cultural and economic value."*

Section 9.3 outlines the 'Opportunities and Challenges of Bioenergy/Biomass within the County:

*"The main advantage that bioenergy has over other forms of renewable energy is the fact that there are many ways in which bioenergy can be produced at varying scales, where it is viable*

[41] GCC (2022) *Galway County Council Local Authority Renewable Energy Strategy*: https://consult.galway.ie/en/consultation/adopted-galway-county-development-plan-2022-2028/chapter/appendix-1-renewable-energy-strategy

*to do so. This flexibility allows for bioenergy to be effectively utilised in several settings. There are, however, some contentious uses of bioenergy such as biofuels produced from food crops in order to fuel the transport industry or to create heat and electricity. This can potentially harm food production and can be avoided by using agricultural residue or waste as an alternative source. Notwithstanding this, to be effectively widely utilised and to be sustained on a large scale, residual biomass needs to be harvested on a commercial scale. Some residual forms of biomass such as agricultural residue, forest thinning and tallow are not yet harvested on such a scale, therefore their ability to sustain energy requirements at a large scale is limited but the potential to harvest such forms of biomass at larger scale remains.*

*Use of land for harvesting energy crops such as wheat, oilseed rape, sugar beet, maize, willow and miscanthus is not currently implemented on a large scale in Ireland due to concerns surrounding profitability, land use competition and availability. Rather, these energy crops are typically grown for food, fodder or export, which means bioenergy is in direct competition with established and necessary practices in sourcing fuel. The use of land for harvesting energy crops should be considered where suitable land is identified and is not in conflict with food, fodder or exportation production. Notwithstanding this, the remit of the planning process does not generally cover agricultural practices such as planting or harvesting, so energy crop production cannot realistically be guided by this strategy or the wider planning process."*

**Bio-energy and Bio-mass Potential Contribution (Section 6.6):**

Section 6.6 relates to Bio-energy and Bio-mass. The recommended strategy for bioenergy is provided in this section, which states, *"Bio-Energy and Bio-Mass should be supported by policy and should be open for consideration in all areas - subject to compliance with all other statutory requirements."*

***Estimation of Capacity by 2030***

Section 6.6 states, *"Best estimates are that there may be as much as 10MW of existing Bio-energy capacity in Galway."*

This Section further states, *"The strategy limits its estimate of potential future capacity to a qualitative estimate of a 'Moderate' - thus a trebling of output from this type of energy could produce up to an additional 30MW of capacity."*

Section 19 provides an analysis of renewable energy developments refused planning permission in Appendix C shows that the following issues were commonly cited as reasons for refusals:

- *"Location of developments within or close to protected areas which raised concerns about habitat destruction;*
- *Landscape and visual impact;*
- *Location of developments in areas of High Scenic Amenity value;*
- *Insufficient information to allow for a full and proper assessment of impacts; and*
- *Non-compliance with the County Development Plan in place at the time.*

*It is therefore imperative that renewable energy development proposals seek to address the aforementioned issues from the outset, along with the challenges outlined in Section 9 of this LARES."*

The current application addresses each of these issues which have arisen on other applications for similar forms of development. The EIAR includes a detailed ecology assessment, and confirms that no significant impact on habitats and species will arise. The NIS submitted with the application includes appropriate mitigation measures, and ensures that there will be no impact on the integrity of European Sites arising from the development. The development is appropriately sited to minimise visual impact, and a full LVIA is included as part of the EIAR.

We note the following LARES Policy Objectives:

- **LARES Policy Objective 2:** "*Proposed renewable energy generation projects shall fully consider the capacity of the existing transmission grid network in determining the optimal grid connection for the project, in accordance with the proper planning and sustainable development of the area."*
- **LARES Policy Objective 3 – Renewable Energy Generation:** *"To facilitate and support appropriate levels of renewable energy generation in County Galway, in light of the need to transition to a low carbon economy and to reduce dependency on fossil fuels."*
- **LARES Policy Objective 4 – Prioritisation of 'Strategic Areas' for renewable energy development:** *"The areas that are identified as 'Strategic Areas' for renewable energy development will be prioritised for renewable energy uses over other uses, in accordance with the proper planning and sustainable development of the area".*
- **LARES Policy Objective 20:** *"To support and recognise Bioenergy development as a flexible and varied form of renewable energy development that can be implemented in a variety of settings."*
- **LARES Policy Objective 21 (Commercial Bioenergy):** *"Commercial bioenergy proposals should be encouraged to be **located in rural areas** both close to the energy source and the point of demand, and served by public roads with sufficient capacity. All bioenergy facilities will be assessed against the ability of the receiving environment to accommodate them in accordance with the LARES and the proper planning and sustainable development of the area".*
- **LARES Policy Objective 37 (Indigenous renewable energy):** "*To prioritise and actively encourage the generation of indigenous renewable energy in developments throughout County Galway. Proposals involving indigenous renewable energy as the primary source of energy will be considered favourably, in accordance with the LARES and the proper planning and sustainable development of the area."*

**Consistency with the Galway Climate Action Plan (2024-2029) and Galway Renewable Energy Strategy (Appendix 1 CDP)**

The Proposed Development will support the economy of County Galway whilst promoting an enhanced natural environment by diverting agricultural waste into a renewable energy process.

This Proposed Development of a renewable energy development promotes the decarbonisation of the County, will assist in achieving climate change action targets, and supports the circular and bioeconomy, producing renewable gas (biomethane) which can be injected directly into the national gas grid. The proposal will reduce the percentage of overall emissions that the County's two largest sectors (commercial and Industrial and agriculture) contribute. In addition, the proposal contributes to the diversification of the agricultural sector and rural Galway, towards lower carbon and more sustainable practices, whilst also producing and providing organic fertiliser to local farmers.

The Proposed Development will support the County's and nations bioeconomy, whilst being located in a rural area close to the source material and point of demand (as promoted by LARES Policy Objective 21 – Commercial Bioenergy).

### 4.7.4 Galway County Local Economic and Community Plan 2024-2030[42]

According to Section 1 of the LECP, *"The purpose of the Galway County Local Economic and Community Plan (LECP), established under the Local Government Reform Act 2014, is to set a framework, objectives and actions needed to promote and support the economic development and the local and community development of Galway County. The LECP acts as the primary mechanism at the local level to bring forward relevant actions arising from national and regional strategies and policies that have a local remit."*

The Vision of the LECP is: *"An inclusive County, with a clear sense of identity, where we work together to achieve the full economic, social, community, linguistic and cultural potential of Galway County and its people, through citizen engagement at a local level."*

Goal 5 of the LECP is *"A sustainable and climate resilient County."* Section 7 further states that thus goal is to achieve *"A County that protects its environment and supports the transformation to a climate-neutral society".*

At Page 72, a strength of the County in relation to Goal 5 is: *"The Public Sector Climate Action Mandate 2024 requires Irish public bodies to reduce energy-related greenhouse gas emissions by 51% and improve energy efficiency by 50% by 2030, highlighting the need to prioritise climate action targets. (Public Sector Climate Action Mandate 2024)."*

**Objective SCO 5.1:** *"Increase community and business involvement in environmental action and the reduction of Galway County's carbon footprint."* We note **Action 5.1.4** to achieve this objective: *"Implement Galway County Council Climate Action Plan 2024-2029 and increase sustainable practices across the County to contribute to the achievement of regional and national targets."*

**Objective SEDO 5.2:** *"Ensuring a Just Transition in Galway County."* **Action 5.2.1** to achieve this objective is to *"Ensure Just-Transition support for those working in traditional sectors (farming, agriculture, extractive industries) and engage with the EU Just Transition Fund for economy diversification, peatland restoration and sustainable mobility initiatives in qualifying areas of Galway County."*

**Objective SEDO 5.4:** *"Develop Galway's green economy, circular economy and sustainable energy future."* We note the following actions included in the LECP to achieve this objective:

- **5.4.1:** *"Support the development and use of low-carbon technologies such as electric vehicles and low-carbon fuels."*
- **5.4.4:** "Implement effective energy management and projects across community and state agencies aligned with 2030 targets and net zero trajectory."
- **5.4.5:** *"Facilitate climate action throughout the County, by engaging and collaborating with stakeholders and citizens in the development, implementation and review of the Local Authority Climate Action Plan, and provide them with information and support."*

**Goal 6** of the LECP is *"A County that prioritises economic development and education."*

[42] GCC (2024) *LECP*: https://www.galway.ie/en/media/Galway%20County%20LECP%202024-2030.pdf

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**Objective SEDO 6.2** is to *"Attract new and expand existing key sectors and enterprise with significant employment, income and growth potential".* We note the following actions included in the LECP to achieve this objective:

- **6.2.1:** *"To ensure the attractiveness of Galway is retained and developed further as a location for domestic and foreign direct investment and regional development through existing strategic networks including the Strategic Economic Corridor, AEC projects, promotion of key employment locations identified in the GCDP."*
- **6.2.2:** *"Provide targeted support to emerging sectors and clustors including; Tourism; Renewable energy and low carbon future; Marine and Blue Economy; ICT and Digital Enterprise; Life Science (Medtech, Pharma, Biotech, Healthcare); Advanced Manufacturing and Engineering; Argi-tech and Agri-food; and Retail."*

## 4.8 Summary Statement

This chapter examined and summarised the relevant planning, climate, and waste management policy, and the legislative context at European, and national levels with relevance to the Proposed Development at Glenloughaun, Ballinasloe, Co. Galway.

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

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

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

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

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