
INCHAMORE WIND DAC

INCHAMORE WIND FARM

CO. CORK

PLANNING STATEMENT

MAY 2023

Inchamore Wind DAC,
C/O FuturEnergy Ireland,
27/28 Herbert Place,
Dublin 2,
D02 DC97.



Jennings O'Donovan & Partners Limited,

Consulting Engineers,
Finisklin Business Park, Sligo.

Tel: 071 – 9161416

Fax: 071 - 9161080

email: info@jodireland.com

web: www.jodireland.com



JENNINGS O'DONOVAN & PARTNERS LIMITED
Project, Civil and Structural Consulting Engineers,
 FINISKLIN BUSINESS PARK,
 SLIGO,
 IRELAND.






Telephone (071) 9161416
 Fax (071) 9161080

Email info@jodireland.com
 Web Site www.jodireland.com

DOCUMENT APPROVAL

PROJECT	Inchamore Wind Farm	
CLIENT / JOB NO	Inchamore Wind DAC	6226
DOCUMENT TITLE	Planning Statement	

	Prepared by	Reviewed/Approved by
Document Final	Name Breena Coyle Sarah Jones	Name David Kiely
Date May 2023	Signature  	Signature 

This document, and information or advice which it contains, is provided by JENNINGS O'DONOVAN & PARTNERS LIMITED solely for internal use and reliance by its Client in performance of JENNINGS O'DONOVAN & PARTNERS LIMITED's duties and liabilities under its contract with the Client. Any advice, opinions, or recommendations within this document should be read and relied upon only in the context of the document as a whole. The advice and opinions in this document are based upon the information made available to JENNINGS O'DONOVAN & PARTNERS LIMITED at the date of this document and on current standards, codes, technology and construction practices as at the date of this document. Following final delivery of this document to the Client, JENNINGS O'DONOVAN & PARTNERS LIMITED will have no further obligations or duty to advise the Client on any matters, including development affecting the information or advice provided in this document. This document has been prepared by JENNINGS O'DONOVAN & PARTNERS LIMITED in their professional capacity as Consulting Engineers. The contents of the document does not, in any way, purport to include any manner of legal advice or opinion. This document is prepared in accordance with the terms and conditions of JENNINGS O'DONOVAN & PARTNERS LIMITED contract with the Client. Regard should be had to those terms and conditions when considering and/or placing any reliance on this document. Should the Client wish to release this document to a Third Party for that party's reliance, JENNINGS O'DONOVAN & PARTNERS LIMITED may, at its discretion, agree to such release provided that:

- (a) JENNINGS O'DONOVAN & PARTNERS LIMITED written agreement is obtained prior to such release, and
- (b) By release of the document to the Third Party, that Third Party does not acquire any rights, contractual or otherwise, whatsoever against JENNINGS O'DONOVAN & PARTNERS LIMITED and JENNINGS O'DONOVAN & PARTNERS LIMITED, accordingly, assume no duties, liabilities or obligations to that Third Party, and
- (c) JENNINGS O'DONOVAN & PARTNERS LIMITED accepts no responsibility for any loss or damage incurred by the Client or for any conflict of JENNINGS O'DONOVAN & PARTNERS LIMITED's interests arising out of the Client's release of this document to the Third Party.

Directors: D. Kiely, C. McCarthy
Regional Director: A. Phelan
Consultants: C. Birney, R. Gillan

Senior Associates: R. Davis, M. Forbes, S. Gilmartin, J. Healy, S. Lee, J. McEivany, T. McGloin, S. Molloy
Associates: B. Coyle, D. Guilfoyle, L. McCormack, C. O'Reilly, M. Sullivan

Company Reg No. 149104 **VAT Reg. No.** IE6546504D



INCHAMORE WIND DAC

INCHAMORE WIND FARM

PLANNING STATEMENT

CONTENTS

Statement of Authority1

1 Introduction2

1.1 Proposed Development2

1.2 Need for the Development – International and National Policy8

1.3 The Climate Emergency8

1.4 International Energy Policy9

1.5 European Energy Target11

1.6 National Policy13

1.6.1 National Planning Framework.....13

1.6.2 National Energy Security Framework14

1.6.3 Climate Action and Low Carbon Development Act 202115

1.6.4 The Climate Action Plan 202316

1.6.5 National Energy and Climate Plan 2021-203016

1.6.6 Conclusions17

1.7 Regional Energy Policy.....17

1.8 Summary of Need for Development and Compliance with International, National, Regional policies
20

2 Development Plan Policy Appraisal.....21

2.1 Introduction21

2.2 Cork County Development Plan 2022-2028 Assessment21

2.3 Wind Energy Strategy37

2.4 The Kerry County Development Plan 2022 – 202840

2.5 Conclusions of Development Plan Policy Appraisal43

3 Key Environmental Matters44

3.1 Introduction44

4 Economic Importance of the Development.....48

5 The Development as Sustainable Development50

6 Conclusion52

Tables:

Table 1.1: Key Planning Policy Objectives from the RSES

Table 2.1: Relevant Planning Policies from The Cork County Development Plan 2022-2028

Table 5.1: The Development as Sustainable Development

Figures:

Figure 1.1: Candidate Turbine Dimensional Considerations Elevations

Figure 1.2: Site Location Plan with the Site Outlined in Red

Figure 2.1: Wind Farm Designations (Map Extract Taken from The Cork CDP 2022-2028 and Kerry CDP 2022-2028)

Figure 4.1: Onshore Wind Impacts in Ireland (From The Economic Impact of Onshore Wind in Ireland Figure 1.6)

STATEMENT OF AUTHORITY

This Planning Statement has been prepared by Breena Coyle, Sarah Jones and David Kiely of Jennings O'Donovan & Partners Limited.

Breena Coyle, Senior Town Planner in Jennings O'Donovan & Partners Limited (JOD), has a Masters in Environment Planning from Queens University and has over 12 years' experience in Environmental Planning throughout Ireland and the UK. She has a clear understanding of the legislative framework and has experience in the development of windfarms from the pre-planning process through to construction.

Sarah Jones is a Graduate Environmental Scientist and holds a first-class MSc in Environmental Sustainability from University College Dublin and a Bachelor (Hons.) Degree in Geography from Manchester Metropolitan University. Sarah's experience includes EIA screenings, Appropriate Assessment (AA) screenings, planning and environmental reports, Environmental Impact Assessments and Construction Environmental Management Plans.

David Kiely, Director of Jennings O'Donovan & Partners Limited, holds a BE in Civil Engineering from University College Dublin and MSc in Environmental Protection from IT Sligo. He is a Fellow of Engineers Ireland, a Chartered Member of the Institution of Civil Engineers (UK) and has over 39 years' experience. He has extensive experience in the preparation of EIAR and EIS for environmental projects including Wind Farms, Solar Farms, Waste Water Projects, Quarries and various commercial developments. David has also been involved in the construction of over 50 wind farms since 1997.

1 **INTRODUCTION**

This Planning Statement considers the Development's accordance with the principles of Proper Planning and Sustainable Development, having regard to National, Regional and County-level policies and plans, together with relevant statutory guidelines. The assessment considers all permutations within the turbine parameter range as specified in Chapter 1 Introduction, section 1.9.4 of the EIAR.

The Statement is set out as follows:

- **Section 1: Introduction**
- **Section 2: The Need for The Development**
- **Section 3: Development Plan Policy Appraisal**
- **Section 4: Key Environmental Matters**
- **Section 5: Economic Importance of the Proposed Development**
- **Section 6: The Development as Sustainable Development**
- **Section 7: Conclusion**

1.1 **Proposed Development**

Jennings O'Donovan & Partners Limited, Consulting Engineers, have prepared this Planning Statement ("the Statement") on behalf of Inchamore Wind DAC to accompany the application ("the Application") to Cork County Council and Kerry County Council ("the Planning Authority") under Section 34 of the Planning and Development Act 2000, as amended.

The proposed development in county Kerry and County Cork will consist of the following main components:

- A wind farm with an operational lifespan of 35 years (from the date of commissioning of the development).
- The construction of five turbines with an overall ground to blade tip height ranging from 177 m to 185 m inclusive; a rotor diameter ranging from 149 m to 155 m inclusive; and a hub height ranging from 102.5 m to 110.5 m inclusive.
- Construction of permanent turbine hardstands and turbine foundations.
- Construction of one temporary construction compound with associated temporary site offices, parking areas and security fencing.
- Installation of a (35-year life cycle) meteorological mast with a height of 110 m and a 4 m lightning pole on top, such that the overall structure height will be 114 m.
- Development of one on-site borrow pit.
- Construction of new permanent internal site access roads and upgrade of existing internal site access roads to include passing bays and all associated drainage infrastructure.
- Development of a permanent internal site drainage network and sediment control systems.
- Construction of a permanent 38 kV electrical substation including a control building with welfare facilities, all associated electrical plant and equipment, parking, security fencing and

gates, all associated underground cabling, wastewater holding tank, and all ancillary structures and works.

- All associated underground electrical and communications cabling connecting the wind turbines to the on-site wind farm substation.
- Ancillary forestry felling to facilitate construction of the Development.
- All associated site development works including berms, landscaping, and soil excavation.
- Upgrade of existing forest access roads to include passing bays and all associated drainage infrastructure.
- Upgrade works on the Turbine Delivery Route to include the following:
 - Works at an entrance to an existing forest road accessed off the N22 to include localised widening of the forest road and creation of a splayed entrance, removal of existing vegetation for visibility splays and removal of street furniture to facilitate construction traffic including the delivery of abnormal loads and turbine component deliveries.

A 10-year planning permission is sought. A 35-year operational life for the wind turbines and met mast, from the date of commissioning of the entire wind farm is being sought. This reflects the lifespan of modern-day turbines.

A permanent planning permission is being sought for the other elements including the onsite substation which will become an asset of the national grid under the management of ESB & EirGrid and therefore will remain part of the national grid network upon decommissioning of the wind farm.

Decommissioning will include the removal of five wind turbines and above ground concrete plinths. It will also include the meteorological mast structure, all associated underground electrical and communications cabling connecting the wind turbines to the wind farm substation (ducting is to remain in-situ). As stated above all other elements of the proposed development including the on-site substation will remain in-situ. The Site Access Roads and associated drainage systems will serve ongoing forestry and agriculture activity in the area. All other hard surfaced areas will be allowed to revegetate naturally.

Permission is not being sought for a Grid Connection Route or the turning area in Cummeenavrick, however the below is assessed as part of the Project in the EIAR:

- All works associated with the permanent connection of the wind farm to the national electricity grid comprising a 38 kV underground cable in permanent cable ducts from the proposed, permanent, on-site substation, in the townland of Inchamore and onto the townlands of Inchamore, Derreenaling, Derryreag, Cummeenavrick, Glashacormick, Clydaghroe and Cummeennabuddoge to the existing Ballyvouskill 220 kV Substation in the townland of Caherdowney.

- The construction of a temporary access road off the N22 in the townland of Cummeenavrick to facilitate a 180 degrees turning manoeuvre by construction vehicles and reinstatement at the end of the construction period.

Permission is also not being sought for the construction of a temporary access road off the N22 in the townland of Cummeenavrick, Co. Kerry, to facilitate a 180 degrees turning manoeuvre by construction vehicles and reinstatement at end of the construction period. However, the temporary works are assessed in the EIAR as part of the overall Project.

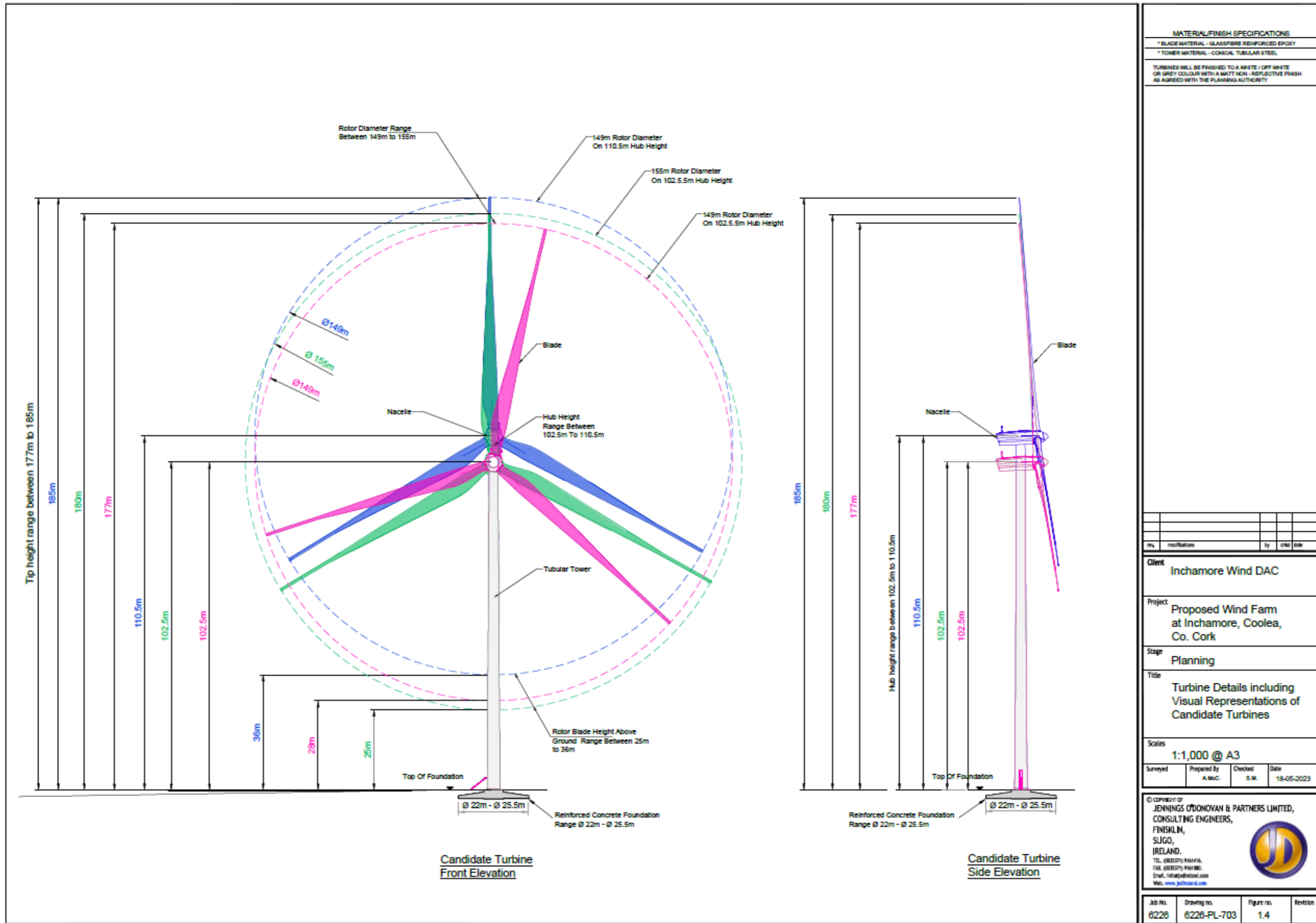


Figure 1.1: Candidate Turbine Dimensional Considerations Elevations

The Site

The Site; all land that falls within the Proposed Inchamore Wind Farm Redline Boundary, extends to 170.1 ha, of which 145.4 ha largely consists of low yielding, commercial forestry. On-going forestry management of the site is independent of the project. There is no interrelationship between the proposed wind farm project and previous forestry consents/activity and the wind farm is a stand alone development. Coillte own 76.0 ha of the forestry (53% of forestry on site) while 69.4 ha (47%) of the forestry is owned privately. Turbines T2, T3, T4 and T5 are surrounded by forestry. Tree felling will be required as part of the Project. To facilitate the construction of access roads, civil works, site compounds, borrow pits and Turbine Hardstands, 26.43 ha coniferous forestry will need to be permanently clearfelled. The felling area proposed is the minimum necessary to construct the Development and to comply with any environmental mitigation. Lands of equivalent in area to those lands being permanently clearfelled will be afforested (the afforestation is not part of the planning application and will be subject to a separate licence process with the Department of Agriculture, Food and the Marine). These replant lands will be greater than 10 km from the (wind farm) Site and also outside any potential hydrological pathways of connectivity i.e., outside the catchment within which the proposed project is located. The remaining third-party land is agricultural land of varied productivity and open mountain heath. The Site is located 5.9 km west of Ballyvourney, Co. Cork and shares the county boundary between Cork and Kerry. It is 54 km west of Cork City, and 23 km north-east of Kenmare, Co. Kerry.

The Site elevations range from 460 m AOD in the north-western side of the Site to 350 m AOD towards the eastern side of the Site. A Site Location Map showing the site boundary (which is also the redline planning application boundary) is outlined in **Figure 1.2**.

The Site is located in a rural setting and housing density in the area is low. There are 39 dwellings within a 2 km radius of the proposed turbines, comprising one off houses and farm holdings. The nearest settlements are Inchamore which is situated 750 m to the south of the Site Boundary, and the townland of Milleeny which is located 1 km to the south-east of the Site Boundary. The nearest house is located 753 m from turbine T2.

The proposed Development is located within the townlands of Inchamore, Mileeny Derryreag and Derreenaling .

Land Ownership

A portion of the Site (73.0 ha) is owned by Coillte. The majority of the Site is located on lands under the ownership of third-party private landowners who have consented to the application and the Development. Letters of consent from all landowners accompany this application.



Figure 1.2: Site Location Plan with the Site Outlined in Red

Environmental Impact Assessment Directive 2011/92/EU (as amended), Habitats Directive 92/43/EEC (as amended) & Birds Directive 2009/147/EU (as amended).

The Development requires an Environmental Impact Assessment (EIA) as it comes within class 3(i) of Annex II to the EIA Directive 2011/92/EU as amended by Directive 2014/52/EU and is above the threshold set for this class of project by Schedule 5, Part 2 of the Planning and Development Regulations 2001, as amended. An Environmental Impact Assessment Report (EIAR) is submitted with this application.

A report to inform screening for appropriate assessment has been prepared by the Developer and is submitted to the competent authority with the application, in this case Cork County Council and Kerry County Council, to assist them in their determination of whether an appropriate assessment is required for the Development in accordance with the Habitats Directive 1992/43/EEC) and the Birds Directive 2009/147/EU, as transposed by Part XAB of the Planning and Development Act 2000, as amended.

While Cork County Council and Kerry County Council, as the competent authorities, carry out the screening assessment and are required to reach their own conclusion, the findings of the screening report indicate that appropriate assessment of the Development is required. Therefore, in anticipation of the competent authority finding that appropriate assessment is required, a Natura Impact Statement (NIS) has been prepared and forms part of the documentation submitted with the planning applications for the Development.

The Natura Impact Statement which accompanies this application has considered the potential effects of the proposed Development, alone and in combination with other plans and projects on the thirteen European sites identified as within the zone of influence of the Development.. The NIS contains sufficient information to allow Cork County Council and Kerry County Council, as the competent authorities, to carry out appropriate assessment of the proposed Development and determines it will not adversely affect the integrity of European sites.

1.2 Need for the Development – International and National Policy

This section outlines the need for the Development based on international policy and an assessment of the need to implement legally binding national climate change targets by encouraging appropriate renewable energy development throughout Ireland.

1.3 The Climate Emergency

On 29th November 2019 the European Parliament declared a climate emergency ahead of the UN COP 25 in Madrid in December 2019. In May 2019 the Oireachtas declared a “climate emergency” in an amendment to the report ‘*Climate Action: A cross-party consensus for action*’ which followed the recommendations of the Citizens Assembly on Climate Action.

There then followed the publication of the Cross-Departmental Climate Action Plan 2019 on 17th June 2019. The Plan reflects the accepted wisdom that decisive and urgent action is required to arrest the acceleration of greenhouse gas emissions within the limited window of opportunity that remains. The Plan is ambitious, affecting almost every sector of the economy. The key focus of the Plan is to identify how the Government will reduce Ireland's, still growing, greenhouse gas emissions.

The Plan includes a commitment to make Ireland 100% carbon neutral by 2050 and contains 183 action points designed to achieve our national climate change targets. The scale of the challenge is huge, and the Plan identifies the need for everyone to contribute to tackling the challenges posed by climate change. It includes increased renewable electricity targets, the end of single use non-recyclable plastics and new building regulations. It will impact how our homes and businesses are heated, how we generate and consume electricity, how we travel and how food is produced. This includes supporting the growth of Electric Vehicles to at least 800,000 and implementing policies to attain the installation of 600,000 heat pumps to decarbonise heating demand and meeting 70% of this increased electricity demand, from renewable sources (increased to 80% in the CAP2023), all by 2030. This is more than double the current level of renewable energy penetration.

More recently, the Government pledged to generate 80% of the country's electricity supply from renewable sources by 2030 in the (updated) Climate Action Plan 2023. Ireland is facing significant challenges in efforts to meet these targets alongside its commitment to transition to a low carbon economy by 2050. Onshore wind energy, in line with the CAP2023 needs to increase to 9 GW by 2030, requiring an additional 4.7 GW of installed capacity, double the existing onshore wind capacity. Renewables accounted for 36.4% of electricity generated in 2021 (with wind energy generating 85% of this), this needs to increase to 80% by 2030 to achieve the national target. Therefore, there is a clear necessity and it is of urgent national importance to increase the amount of energy from renewable sources, especially onshore wind, which is capable of being deployed in the near term.

1.4 **International Energy Policy**

International energy policy is based on the demand to battle climate change and reduce carbon dioxide (CO₂) emissions and, therefore, is relevant to renewable energy development.

The United Nations Framework Convention on Climate Change (UNFCCC)¹ implemented by the United Nations in May 1992, determined a long-term objective to lessen greenhouse gases in the atmosphere, with the purpose of preventing anthropogenic interference with the climatic system. Subsequently, the Kyoto Protocol was implemented in 1997. National governments who signed up to the Kyoto Protocol are committed to reducing their greenhouse gas emissions. The UNFCCC recognises that the climate system is a shared resource whose stability can be affected by industrial and other emissions of carbon dioxide and other greenhouse gases. The convention enjoys near universal membership, with 197 countries listed as being Parties to the Convention.

The Kyoto Protocol is an international treaty which extends the 1992 United Nations Framework Convention. The Kyoto Protocol came into effect in 2005, as a result of which, emissions reduction targets agreed by developed countries, including Ireland, are now binding. Under the Kyoto Protocol, the EU agreed to achieve a significant reduction in total greenhouse gas emissions of 8% below 1990 levels in the period 2008 to 2012. Ireland's contribution to the EU commitment for the period 2008 – 2012 was to limit its greenhouse gas emissions to no more than 13% above 1990 levels.

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

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

¹ The United Nations Framework Convention on Climate Change (UNFCCC) (1992). <http://unfccc.int/resource/docs/convkp/conveng.pdf>
Accessed 23/03/2023

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

The Paris Agreement is a legally binding international treaty on climate change. It was adopted by 196 Parties at COP 21 in Paris, on 12 December 2015 and entered into force on 4 November 2016. It seeks to accelerate and intensify the actions and investment needed for a sustainable low carbon future. Its central aim is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. The Agreement also aims to strengthen the ability of countries to deal with the impacts of climate change. On 5 October 2016, the threshold for entry into force of the Paris Agreement was achieved. Ireland is legally bound by Article 7 of the United Nations COP21 Paris Agreement¹⁰, signed in December 2015, to prepare and submit periodic updates on its national adaptation and mitigation plans in the global effort to keep global warming below 1.5°C. (See section 2.4; National energy Policy below).

The United Nation's (UN) 26th global climate summit was held in 2021 in Glasgow, where nations committed to a range of decisions in a collective effort to limit global temperatures to 1.5 degrees. The conference focussed on driving action across.

- Mitigation - reducing emissions
- Adaptation - helping those already impacted by climate change
- Finance - enabling countries to deliver on their climate goals
- Collaboration - working together to deliver even greater action

Out of 189 Parties that have ratified the Paris Agreement, 90% mentioned renewables and roughly 70% included quantifiable energy targets in their initial Nationally Determined Contributions.

However, a report by the International Energy Agency² cautions that renewables growth will still need to double to reach the Paris Agreement goal of achieving net-zero emissions by 2050. The International Renewable Energy Agency (IRENA), an intergovernmental organisation focusing on sustainable energy, in a report³ on the Nationally Determined Contributions relating to renewable energy also note that even with the renewable energy pledges in the 2021 Paris agreement the 1.5°C goal will still be exceeded before the end of the century.

Ireland is one of the 186 countries signed up to the Paris agreement, under the terms, Ireland is required to reduce greenhouse gas emissions by at least 40% by 2030 when compared with levels in 1990. The proposed Development will displace heavily polluting fossil fuels by producing renewable wind energy.

² IEA. (2021) Renewables 2021 <https://www.iea.org/reports/renewables-2021> Accessed 23/03/2023

³ IRENA. (2021) https://www.irena.org/-/media/Files/IRENA/Agency/Publication/2022/Jan/IRENA_NDCs_RE_Targets_2022.pdf Accessed 23/03/2023

1.5 **European Energy Target**

The European Union's (EU) energy policies are set out and powered by three main objectives:

- To ensure energy providers operate in a competitive environment, ensuring affordable prices for homes and businesses;
- To secure energy supplies and to ensure reliable energy delivery whenever and wherever it is needed; and
- To have sustainable energy consumption, through lowering dependence on fossil fuels and decreasing greenhouse gas emissions and pollution.

The EU enacted the Renewable Energy Directive 2009/28/EC⁶, revised in 2018¹¹, to make the EU a global leader in renewable energy and ensure that the target of the final energy consumption is at least 16% renewables by 2020 and 27% renewables by 2030. Subsequently, in 2015, the EU set itself a long-term goal of achieving net zero greenhouse gas emissions by 2050.

In May 2022, the commission published The REPowerEU Plan⁴ which puts forwards a set of actions to:

- Save energy;
- Diversify supplies;
- Quickly substitute fossil fuels by accelerating Europe's clean energy transition;
- Smartly combine investments and reforms.

It notes that:

"Slow and complex permitting processes are a key obstacle to unleashing the renewables revolution and for the competitiveness of the renewable energy industry"

The REPowerEU plan also includes an amendment to the Renewable Energy Directive⁵ stating: *"Lengthy administrative procedures are one of the key barriers for investments in renewables and their related infrastructure. These barriers include the complexity of the applicable rules for site selection and administrative authorisations for projects, the complexity and duration of the assessment of the environmental impacts of the projects, grid connection issues, constraints on adapting technology specifications during the permit-granting procedure, or staffing issues of the permit-granting authorities or grid operators. In order to accelerate the pace of deployment of renewable energy projects it is necessary to adopt rules which would simplify and shorten permit-granting processes."*

Proposed amendments to the directive made in May 2022 include:

- Renewable energy projects are presumed to be of 'overriding public interest'
- Increasing the European Union's renewable energy target to 45% by 2030.

⁴European Commission. (2022) https://eur-lex.europa.eu/resource.html?uri=cellar:fc930f14-d7ae-11ec-a95f-01aa75ed71a1.0001.02/DOC_1&format=PDF Accessed 23/03/2023

⁵ European Commission. (2022) <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52022PC0222&from=EN> Accessed 23/03/2023

In 2021 the EU reached a 22.8%⁶ share of its gross final energy consumption from renewable sources which leaves a long way to go to reach this increased target.

In accordance with the REPowerEU Communication in May 2022, the Commission published a recommendation ⁷ on speeding up permit-granting procedures for renewable energy projects, accompanied by guidance to help the Member States speed up permitting for renewable energy plants.

The recommendation was created in order to help Member States exploit all possibilities for acceleration that exist within the legislative framework. It proposes measures to streamline procedures at national level, addresses ambiguities in the application of EU legislation and sets out good practices in Member States. It recommends participatory approaches that involve local and regional authorities and providing authorities with the necessary resources so as to facilitate the timely realisation of locally adapted investments.

Recommendations include:

*“Member States should ensure that the planning, construction and operation of plants for the production of energy from renewable sources, their connection to the electricity, gas and heat grid and the related grid itself and storage assets **qualify for the most favourable procedure available in their planning and permit-granting procedures** and are **presumed as being in the overriding public interest** and in the **interest of public safety**, in view of the legislative proposal amending and strengthening the provisions of Directive (EU) 2018/2001 related to administrative procedures and without prejudice to the Union law.”*

“Member States should establish clearly defined, accelerated and as short as possible deadlines for all the steps required for the granting of permits to build and operate renewable energy projects, specifying the instances where such deadlines may be extended and under which circumstances. Member States should establish binding maximum deadlines for all relevant stages of the environmental impact assessment procedure.”

On 22nd December 2022 Council Regulation (EU) 2022/2577 laying down a framework to accelerate the deployment of renewable energy was published. It outlines that renewable energy plants, including wind energy, are crucial to fight climate change and pollution, reduce energy prices, decrease the Union's dependence on fossil fuels and ensure the Union's security of supply. The aim of the regulation is to eliminate bottlenecks in new permitting procedures. It notes that considering renewable energy projects as being presumed of overriding public interest and serving public health and safety would allow new projects to benefit from a simplified assessment for specific derogations foreseen in the relevant Union environmental legislation with immediate effect.

⁶ European Commission. (2023). https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Renewable_energy_statistics#Share_of_renewable_energy_more_than_doubled_between_2004_and_2020 Accessed 23/03/2023

⁷EU. [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=PI_COM:C\(2022\)3219&from=EN](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=PI_COM:C(2022)3219&from=EN) Accessed 23/03/2023

It states:

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

The Renewable Energy Directive target increase, and the use of “over riding public interest” in this regulation underlines the vital nature of investments into new renewable energy developments. Although IROPI does not apply to the Development as there are not any adverse effects on the integrity of a European Site, REPowerEU and Regulation 2022/2577 signals a broad support at the EU level to accelerate the deployment of renewable energy sources.

1.6 National Policy

The EU Governance of the Energy Union and Climate Action Regulation 2018/1999 came into force when it was published in the Official Journal of the EU 11 December 2018. It requires Member States to develop integrated national energy and climate plans (NECP) to cover:

1. Security, Solidarity and Trust – Working closely with Member States to diversify Europe’s sources of energy and ensure energy security.
2. A fully-integrated internal energy market – Energy should flow freely across the EU, without technical or regulatory barriers. This would enable energy providers to compete freely and promote renewable energy while providing the best energy prices.
3. Energy Efficiency – Improving energy efficiency to reduce the EU’s dependence on energy imports, cut emissions and drive jobs and growth.
4. Climate Action – Putting in place policies and legislation to cut emissions, moving towards a low-carbon economy and fulfilling the EU’s commitments to the Paris Agreement on climate change.
5. Research, Innovation and Competitiveness – Supporting research and innovation in low-carbon and clean energy technologies which can boost the EU’s competitiveness.

Ireland’s NECP is discussed in Section 2.4.5

1.6.1 National Planning Framework

The two relevant policies for consideration in the National Planning Framework (NFP) are 54 and 55, see sections below.

1.6.1.1 National Policy Objective 54

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

National Policy Objective 54 has been fulfilled by the establishment of national, regional and local policy to facilitate renewables. By demonstrating accordance with these policies, the Development will contribute to the achievement of this national policy objective.

1.6.1.2 National Policy Objective 55

“Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050.”

The Development is located in an area designated as ‘Open to Consideration’ for wind development in the Cork CDP, the county assessment included consideration of wind resources, avoiding population centres, accessibility to the electrical grid, the value and sensitivity of the surrounding landscape and avoidance of nature conservation sites in particular Natura 2000 sites (SPA and SAC). The Development has also been assessed under each of the topics contained in the EIAR, with adverse residual environmental impacts actively avoided in line with National Policy Objective 55 of the NFP. It is clear from the findings of the EIAR and the NIS that the Development is located in an appropriate location.

1.6.2 National Energy Security Framework

An Energy Security Emergency Group was established in April 2022 to coordinate and oversee Ireland’s response to the Russian invasion of Ukraine. This group, chaired by the Department of the Environment, Climate and Communications, has overseen the development of a new National Energy Security Framework in April 2022.

The National Energy Security Framework coordinates work on energy security across the oil, gas and electricity sectors and sets out a ‘whole-of-government’ response to energy security including a key focus on energy affordability.

It provides a single overarching and initial response to address Ireland’s energy security needs in the context of the war in Ukraine. It sets out how Ireland is seeking to phase out dependency on Russian gas, oil and coal imports as soon as possible in order to address the urgent need to secure Ireland’s energy supply.

It is focused on three areas of work:

- Reducing demand for fossil fuels, which would seek to reduce overall demand for oil, natural gas and coal in Ireland.
- Replacing fossil fuels with renewables, which would seek to reduce the use of gas, oil and coal in Ireland by replacing it with renewable energy sources such as wind energy, solar energy or bioenergy.
- Diversifying fossil fuel supplies, which would seek to replace any Russian supplies of gas, oil and coal (direct or indirect) with supplies from other sources.

The framework highlights the impact of the Russian invasion of Ukraine on energy security, consumer price wise in the short term and how and where energy is sourced to ensure long term system resilience. It notes that:

“The war has highlighted key dependencies in our energy system which can no longer be relied on and has led to affordability issues for many consumers and businesses”.

The framework builds on the idea of energy security as the uninterrupted availability of energy sources at an affordable price and is a response to the challenges of ensuring the ongoing and long-term security of affordable energy supply.

Ireland has one of the highest rates of importing fuel in Europe with imported dependency increasing to 80% in 2021 according to the SEAI⁸. Energy demand in Ireland has been growing and is expected to continue to increase, especially electricity demand which is expected to grow by 37% to 2031⁹. Increases to the cost of carbon, supply issues and potential political insecurity increases fossil fuel price volatility. The high rate of imported fossil fuel dependency and the increasing demand for electricity make it vital to introduce more domestic renewable energy generation plants, such as the Inchamore Wind Farm to provide reliable, secure and affordable energy supplies in Ireland.

The new framework underlines the importance of new renewable energy generation projects, such as Inchamore Wind Farm, in securing Ireland's energy supply in light of the war in Ukraine and resulting energy supply issues.

1.6.3 Climate Action and Low Carbon Development Act 2021

The Climate Action and Low Carbon Development (Amendment) Act 2021 commits Ireland to reach a legally binding target of net-zero greenhouse gas emissions no later than 2050, and a cut of 51% by 2030 (compared to 2018 levels).

It establishes a framework with clear, legally binding targets and commitments, and ensures the necessary structures and processes are embedded on a statutory basis to achieve our national, EU and international climate goals and obligations in the near and long term.

The Act includes the following key elements:

- Places on a statutory basis a 'national climate objective', which commits Ireland to pursue and achieve no later than 2050, the transition to a climate resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy.

⁸ SEAI. (2022). ENERGY IN IRELAND. https://www.seai.ie/data-and-insights/seai-statistics/key-publications/energy-in-ireland/?qclid=EAlaIqobChMI-LH_o6r8_QIV09_tCh23YAykEAAAYASAAEgJipvD_BwE Accessed 29/03/2023

⁹ EirGrid. (2022). EirGrid's Generation Capacity Statement Predicts Challenging Outlook for Ireland <https://www.eirgridgroup.com/newsroom/eirgrids-generation-capac/#:~:text=The%20GCS%2C%20in%20its%20median,relatively%20consistent%20across%20the%20decade.> Accessed 29/03/2023

- Embeds the process of carbon budgeting into law, Government are required to adopt a series of economy-wide five-year carbon budgets, including sectoral targets for each relevant sector, on a rolling 15-year basis, starting in 2021.
- Actions for each sector will be detailed in the Climate Action Plan, updated annually.
- A National Long Term Climate Action Strategy will be prepared every five years.

1.6.4 The Climate Action Plan 2023

The Climate Action Plan 2023 sets out a detailed sectoral roadmap designed to deliver a 51% reduction in greenhouse gas (GHG) emissions by 2030. This requires significant reductions from all sectors. The Plan aims to evaluate in detail the changes that are required in order “*to halve our emissions by 2030 and reach net zero no later than 2050, as we committed to in the Programme for Government*”.

The Plan sets an 80% target for electricity production from renewable sources by 2030 and highlights the need to remove barriers to the development of renewables, including onshore wind. The plan identifies that this will directly reduce emissions but also help with the electrification of other sectors such as transport and heat, reducing emissions in those sectors too. The plan notes that the transition away from fossil fuels and towards locally generated renewables will improve energy security and Ireland's dependence on imported energy.

The Development will contribute to the de-carbonisation of the Irish electricity network by producing between 28 - 33 MW of renewable electricity, contributing to the Government's 80% renewable electricity target by 2030. This will help to mitigate the impacts of climate change by reducing the emissions related to energy production and will help to decarbonise multiple sectors.

1.6.5 National Energy and Climate Plan 2021-2030

The National Energy and Climate (ENCP) Plan¹⁰ is a ten-year integrated document mandated by the European Union to each of its member states in order for the EU to meet its overall greenhouse gases emissions targets.

The plan establishes key measures to address the five dimensions of the EU Energy Union:

- 1) Decarbonisation: GHG emissions and removals and Renewable Energy;
- 2) Energy efficiency;
- 3) Energy security;
- 4) Internal energy market, and
- 5) Research, innovation and competitiveness.

Key, relevant renewable energy objectives include:

¹⁰ Department of Communications, Climate Action and Environment. (2021). National Energy and Climate Plan https://energy.ec.europa.eu/system/files/2020-08/ie_final_necp_main_en_0.pdf Accessed 29/03/2023

- Ireland has established an objective of achieving a 34% share of renewable energy in energy consumption by 2030.
- Increase electricity generated from renewable sources to 70% (note this target has been increased to 80% in the CAP2023), underpinned by the Renewable Electricity Support Scheme (RESS). Streamline consenting and connection arrangements.
- Phase-out of coal and peat-fired electricity generation.
- Increase onshore wind capacity by up to 8.2 GW (note this target has been increased to 9 GW in the CAP2023).

Key, relevant energy security objectives include:

- Support efforts to increase indigenous renewable sources in the energy mix, including wind, solar and bioenergy.
- Facilitate infrastructure projects, including private sector commercial projects, which enhance Ireland's security of supply and are in keeping with Ireland's overall climate and energy objectives.

1.6.6 Conclusions

The Development will contribute between 28 - 33 MW towards Ireland's legally binding targets in the Climate Act and Low Carbon Development Act to reduce greenhouse gas emissions 51% by 2030 and achieve net-zero by 2050 by displacing fossil fuels. This also assists in improving energy security in line with the National Energy Security Framework in light of the war in Ukraine. The Development supports the target of doubling of onshore wind energy generation in Ireland by 2030 and contributes to the nation's target increase of renewable electricity from 30% to 80% by 2030 as set out in the Climate Action Plan 2023. Through the review of policy and legislation (in this section), it has been shown that the Development is firmly in the Irish national interest and is of strategic importance.

1.7 Regional Energy Policy

The Local Government Reform Act 2014 provided for the dissolution of the eight regional authorities and two regional assemblies and for their replacement with three new regional assemblies. The three new regional assemblies were established in 2015 representing the Northern and Western, Eastern and Midland and Southern Regions. Members of the Regional Assemblies consist of the local authorities within that region.

The Regional Spatial and Economic Strategy (RSES) for the Southern Region provides a long-term regional level strategic planning and economic framework, to support the implementation of the National Planning Framework, for the future physical, economic and social development for the Southern Region.

The Regional Spatial and Economic Strategy (RSES) for the Southern Region was adopted on the 31st of January 2020. The objective of the RSES is to support the implementation of the National Planning Framework – Project Ireland 2040 and the economic policies and objectives of the

Government by providing a long-term planning and economic framework, which shall be consistent with the NPF and the economic policies or objectives of the Government.

The RSES for the Southern Region provides a long-term regional level strategic planning and economic framework, to support the implementation of the National Planning Framework, for the future physical, economic and social development for the Southern Region.

One of the key objectives of the RSES is to prioritise action on climate change across all strategic areas and in all economic sectors supported by a robust implementation of time-bound and measurable objectives on climate action for the Southern Region.

The RSES recognises and supports opportunities for onshore wind as a major source of renewable energy with an important role in delivering value and clean electricity for Ireland, stating: "*Opportunities for both commercial and community wind energy projects should be harnessed, having regard to the requirements of DoHPLG Guidelines on Wind Energy*".

Section 2.1 of the RSES sets out the strategic vision for the Southern Region. The RSES acknowledges that climate change represents the most serious threat to human life and the environment. The Southern Regional Assembly supports the implementation of the Government's Climate Action Plan 2019, and the RSES identified three priority areas for action to address climate change and to bring about a Transition to a Low Carbon Economy and Society:

- *Decarbonisation;*
- *Resource Efficiency, and*
- *Climate Resilience.*

The RSES states targets for reduction of emissions across different sectors will be further developed, including key targets for 55% movement by sustainable transport modes. This will be supported by a robust implementation of time-bound and measurable objectives on climate action for the Southern Region. Once adopted, the implementation structures will be established to pursue the objectives identified in the RSES – including the priority areas for action.

There are a number of policies within the RSES which are relevant to the Development. The following policies are of particular relevance:

Table 1.1: Key Planning Policy Objectives from the RSES

RPO	Policy Details	Comment
RPO 96	<p><i>Integrating Renewable Energy Sources</i></p> <p><i>It is an objective to support the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure to integrate a renewable energy source and ensure our national and regional energy system remains safe, secure, and ready to meet increased demand as the regional economy grows.</i></p>	The Development includes a substation which will become an asset of the national grid network and will make a meaningful contribution to electricity supply.
RPO 99	<p><i>Renewable Wind Energy</i></p> <p><i>It is an objective to support the sustainable development of renewable wind energy (on shore and off shore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.</i></p>	The Development has the capacity to generate between 28 - 33 MW of renewable wind energy. The appropriateness of the location has been demonstrated in the EIAR and NIS accompanying this planning application
RPO 100	<p><i>Indigenous Renewable Energy Production and Grid Injection</i></p> <p><i>It is an objective to support the integration of indigenous renewable energy production and grid injection.</i></p>	The Development is a renewable energy generator that captures the indigenous wind resource of the region and has the capacity to generate between 28 - 33 MW of renewable indigenous wind energy which meets the objective of RPO 100.
RPO 101	<p><i>International Hub for Energy Innovation</i></p> <p><i>It is an objective to support continued innovation and research in the energy sector and to develop a role as an international hub for energy innovation.</i></p>	The Development meets the objective outlined in RPO 101 in so far as it will help the southern region's energy sector develop as an international hub for energy innovation.

The RSES sets the framework for the County Development Plans, in this case the Cork County Development Plan 2022-2028 and the Kerry County Development Plan 2022-2028. Both plans highlight the vital importance of a reliable energy supply, increasing renewable energy in line with regional and national targets and the need to transition to a low carbon economy and society.

1.8 Summary of Need for Development and Compliance with International, National, Regional policies

The Russian invasion of Ukraine and resulting energy supply issues combined with Ireland's heavy dependence (80% in 2021¹¹) on imported energy makes it imperative that renewable, domestically produced energy is increased. This is reflected in the REPowerEU Plan, Council Regulation to accelerate the deployment of renewable energy and the National Energy Security Framework.

The National Energy and Climate Plan 2021-2030 and the Climate Action Plan (CAP) 2023 sets out a target for 80% electricity to come from renewable sources by 2030. In 2021 this was at 35% so there is a high demand for new renewable energy sources to achieve this target. Decarbonisation and energy security are also key objectives of both the National Energy and Climate Plan 2021-2030 and CAP2023.

The CAP2023 sets a target of increasing onshore wind to 9 GW by 2030 and a target of 6 GW by 2025. As of May 2022, this was 4.3 GW¹², leaving a shortfall of 4.7 GW to be achieved in 8 years. The Development will contribute 28 – 33 MW of renewable, domestically produced wind energy, helping Ireland to reduce emissions, improve energy security and achieve renewable electricity targets.

The Regional Spatial and Economic Strategy (RSES) for the Southern Region recognises and supports opportunities for onshore wind as a major source of renewable energy with an important role in delivering value and clean electricity for Ireland. Therefore, the Development supports the national and regional policies focusing on onshore wind generation as a central pillar to increase Ireland's energy self sufficiency.

¹¹ SEAI. (2022). ENERGY IN IRELAND 2022. <https://www.seai.ie/publications/Energy-in-Ireland-2022.pdf> Accessed 29/03/2023

¹² Wind energy Ireland. (2022) <https://windenergyireland.com/about-wind/the-basics/facts-stats> Accessed 29/03/2023

2 DEVELOPMENT PLAN POLICY APPRAISAL

2.1 Introduction

The majority of the Development is located within County Cork, bordering the county boundary between Cork and Kerry. It should be noted that a limited range of turbine tip height, hub height and rotor diameter is proposed in the Development and is considered in the analysis in this section. The rationale for how all options have been assessed is described in the relevant EIAR chapters. There are some works required to the site access in County Kerry. The proposed grid connection, which is not part of the development but is considered in the assessments is located in both counties.

This section analyses the County Development Plans for both County Cork and County Kerry.

2.2 Cork County Development Plan 2022-2028 Assessment

The Cork County Development Plan (CCDP) 2022-2028 was adopted on Monday 25th April 2022 and it came into effect on Monday 6th June 2022. The CCDP sets out the blueprint for development in the county.

The CCDP underpins its visions and main aims for the county by core quality of life principles, those most relevant to the Development include Sustainability and Climate Action. It includes a chapter (13) on Energy and Telecommunications, the aim of which is to:

“Facilitate and support investment in sustainable energy production and infrastructure in Cork to meet the future local, regional and national needs, while transitioning to a low carbon economy, addressing the climate change challenge with greenhouse gas emissions and protection of the environmental, cultural and heritage assets of the county.”

The CCDP outlines the importance of reliable energy supply and the growing energy demand in the county. Section 13.5 expands on the commitments of the county towards increasing renewable energy in line with national targets. In terms of wind energy, the plan states:

*“Cork County currently has 38 commissioned wind farms with capacity of 603 MW, equivalent to approximately 16% of the national capacity. However, if Ireland is to meet our renewable energy target then we need to **double capacity nationally over the next ten years**. On a pro rata basis, that could see capacity in **Cork expand to 1,100 MW**. At present there are valid but unimplemented permissions in the county for a further 200 MW of wind power.”*

Accounting for the unimplemented permissions, Cork county remains almost 300 MW behind its stated target for wind energy. The proposed development, by contributing between 28 - 33 MW, will assist Cork Co. Co. in achieving these targets by providing approximately 10% of the shortfall.

The Development Plan includes Chapter 14 ‘Green Infrastructure and Recreation’, within which, subsection 14.7 relates to landscape. A number of general objectives relating to landscape are noted within this chapter and are included below in order to demonstrate how the project is aligned with these landscape policies.

GI 14-9: Landscape:

- a) *Protect the visual and scenic amenities of County Cork's built and natural environment.*
- b) *Landscape issues will be an important factor in all land-use proposals, ensuring that a pro-active view of development is undertaken while maintaining respect for the environment and heritage generally in line with the principle of sustainability.*
- c) *Ensure that new developments meet high standards of siting and design.*
- d) *Protect skylines and ridgelines from development.*
- e) *Discourage proposals necessitating the removal of extensive amounts of trees, hedgerows and historic walls or other distinctive boundary treatments.*

Objective GI 14-10 of the Development Plan states:

"Ensure that the management of development throughout the County will have regard for the value of the landscape, its character, distinctiveness and sensitivity as recognised in the Cork County Draft Landscape Strategy and its recommendations, in order to minimize the visual and environmental impact of development, particularly in areas designated as High Value Landscapes where higher development standards (layout, design, landscaping, materials used) will be required."

Based on the Government's Draft Guidelines for Landscape and Landscape Assessment, Cork County Council prepared a Draft Landscape Strategy in 2007. The Landscape Character Assessment (LCA) of County Cork established a set of 76 landscape character areas reflecting the complexity and diversity of the entire County and involved an evaluation of each landscape character type in terms of its Landscape Value, Sensitivity and Importance. A Landscape Character Assessment was undertaken as part of the Draft Cork Landscape Strategy (2007). This has been incorporated within the current Development Plan in section 14.8 and divides the county into 16 No. Landscape Character Types (LCTs). The site is contained in LCT; 15b 'Ridged and Peaked Upland'

Within the Draft Cork Landscape Strategy (2007), LCT 15b Ridged and Peaked Upland' is described as having:

- Landscape Value: Medium
- Landscape Sensitivity: Medium
- Landscape Importance: County

Within 'Pressure for change' in this LCT (i.e. Page 117 of the Draft Cork Landscape Strategy 2007):

"Windfarms can be seen off in the distance from certain elevated views within this landscape type. While their presence is noted, their visual impact is not major but an accumulation of more windfarms could have a more intolerable visual impact in the future."

The Site is not situated in an area recognised as a 'High Value Landscape' (HVL) and the nearest HVL designation relates to the area within and surrounding Gougane Barra, which is located more than 12 km southwest of the Site.

Relevant objectives relating to 'Landscape Views and Prospects' within the CDP include:

GI 14-12: General Views and Prospects:

"Preserve the character of all important views and prospects, particularly sea views, river or lake views, views of unspoilt mountains, upland or coastal landscapes, views of historical or cultural significance (including buildings and townscapes) and views of natural beauty as recognized in the Draft Landscape Strategy."

GI 14-13: Scenic Routes:

"Protect the character of those views and prospects obtainable from scenic routes and in particular stretches of scenic routes that have very special views and prospects identified in this plan."

GI 14-14: Development on Scenic Routes:

"a) Require those seeking to carry out development in the environs of a scenic route and/or an area with important views and prospects, to demonstrate that there will be no adverse obstruction or degradation of the views towards and from vulnerable landscape features. In such areas, the appropriateness of the design, site layout, and landscaping of the proposed development must be demonstrated along with mitigation measures to prevent significant alterations to the appearance or character of the area."

In the central study area, there are three Co. Cork scenic routes:

- "Scenic Route S23: Road between Macroom and Derrynasaggart Mountains," located approx. 1.1km northeast of the location of the nearest turbine.
- "Scenic Route S24: Road between Coolea and Coom," located within approx. 2.8km south of the location of the nearest turbine.
- "Scenic Route S25: Winding road joining Coolea - Coom road to Lissacresig road," located approx. 4.7km south of the location of the nearest turbine.

The Landscape and Visual Assessment in Chapter 12 of the EIAR has assessed the impacts of the Development taking the sensitivities of the receiving landscape, including the objectives in relation to the landscape character areas, scenic routes and general views and prospects in to account. The assessment concludes that there will be no significant impacts from the Development. (Further commentary is set out in Section 2.3 and 3.0 below.)

The Development Plan includes chapter 15 'Biodiversity and Environment'. The aim of this chapter is to ensure that the natural environment, biodiversity and ecosystems are protected and that Cork County contributes to efforts to reverse the loss of biodiversity and the degradation of ecosystems and

the environment. The chapter highlights the importance of biodiversity to the economy, especially in the form of ecosystems services such as cleaning water and purifying air.

During the Preplanning stages of the Development, meetings were held with Cork County Council, including county ecologists, who flagged that the Development plan's objective BE15-2 is especially relevant to the Development and needed to be considered.

Objective BE 15-2: Protect sites, habitats and species:

- a) *Protect all natural heritage sites which are designated or proposed for designation under European legislation, National legislation and International Agreements. Maintain and where possible enhance appropriate ecological linkages between these. This includes Special Areas of Conservation, Special Protection Areas, Marine Protected Areas, Natural Heritage Areas, proposed Natural Heritage Areas, Statutory Nature Reserves, Refuges for Fauna and Ramsar Sites. These sites are listed in Volume 2 of the Plan.*
- b) *Provide protection to species listed in the Flora Protection Order 2015, to Annexes of the Habitats and Birds Directives, and to animal species protected under the Wildlife Acts in accordance with relevant legal requirements. These species are listed in Volume 2 of the Plan.*
- c) *Protect and where possible enhance areas of local biodiversity value, ecological corridors and habitats that are features of the County's ecological network. This includes rivers, lakes, streams and ponds, peatland and other wetland habitats, woodlands, hedgerows, tree lines, veteran trees, natural and semi-natural grasslands as well as coastal and marine habitats. It particularly includes habitats of special conservation significance in Cork as listed in Volume 2 of the Plan.*
- d) *Recognise the value of protecting geological heritage sites of local and national interest, as they become notified to the local authority, and protect them from inappropriate development*
- e) *Encourage, pursuant to Article 10 of the Habitats Directive, the protection and enhancement of features of the landscape, such as traditional field boundaries, important for the ecological coherence of the Natura 2000 network and essential for the migration, dispersal and genetic exchange of wild species.*

EIAR Chapters 5, 6 and 7 assesses the potential impacts and effects of the development on biodiversity while the report to inform screening for appropriate assessment and Natura Impact statement considers the potential impacts and effects on European (Natura 2000) sites. Surveys were carried out to identify and evaluate the importance of ecological features present within the study area. There are no sites designated for nature conservation within the Project site and as such the Proposed Development only poses a risk of indirect effects on such sites. The nearest designated Natural Heritage Area to the Development is Sillahertane Bog NHA, approximately 5.5 km south-west. The closest European (Natura 2000) site is Killarney National park, Macgillycuddy's Reeks & Caragh River Catchment SAC is approximately 3 km south from the project site. The mitigation measures set out in the Biodiversity chapter of the EIAR, in the Construction Environmental Management Plan (CEMP) and the Natura Impact Statement (NIS) will ensure that there will be no effects on sites designated for nature conservation as a result of the Project. This approach aligns with **Objective BE 15-2 (a)** by

protecting all natural heritage sites which are designated or proposed for designation under European legislation, National legislation and International Agreements.

A number of mitigation measures are embedded into the design to protect habitats and species including minimisation of the works footprint and siting to avoid sensitive ecological features. Mitigation by avoidance for protected species includes timing of specific works to avoid disturbance, or potential mortality of species such as common lizard, the curtailment of turbines for bats at certain times of the year and in certain weather conditions and measures to avoid downstream pollution of watercourses. This approach aligns with **Objective BE 15-2 (b)** Providing protection to species in line with relevant legal requirements.

The proposed wind farm will result in the loss of 2.5 ha of a mosaic of dry heath, wet heath, outcropping silicious rock and some blanket bog (all Annex I listed habitats) resulting in significant residual effects (after mitigation). The residual effects of the 2.5 ha of habitat loss will be offset by the enhancement and management of 10.8 ha of peatland habitats, such as wet heath and degraded blanket bog, in an area west of the site redline boundary. This area of peatland habitat is contiguous with peatland habitats in the wider landscape providing ecological and landscape connectivity. The habitat management and enhancement measures will improve the quality of the degraded peatland habitats through the restoration of the structure and function of the habitats. These measures will also benefit ground nesting birds typically associated with peatland habitats in addition to improving floral diversity and habitat quality for protected species such as common lizard. The biodiversity enhancement and management measures proposed for the peatland habitats are in line with industry good practice and have been applied on other proposed and operational wind farms such as Castlepook wind farm and the nearby Grousemount wind farm. Habitat management and enhancement measures are proposed as compensation for habitat loss and to achieve a net gain for biodiversity. Important documents in the delivery of these are the Habitat Construction Environmental Management Plan (which sets out work approaches and requirements during construction to avoid downstream water quality impacts), and a Surface Water Management Plan to ensure no long-term impacts on water quality within the freshwater pearl mussel catchment. This approach aligns with **Objective BE 15-2 (c)** to protect and where possible enhance areas of local biodiversity value, ecological corridors and habitats that are features of the County's ecological network and **Objective BE 15-2 (e)** to encourage the protection and enhancement of features of the landscape, such as traditional field boundaries, important for the ecological coherence of the Natura 2000 network and essential for the migration, dispersal and genetic exchange of wild species.

There are no Geological Heritage sites in the Project site with the closest such site 6.6 km southeast of the Development. There is no risk of any effects on these sites and thus policy **Objective BE 15-2 (d)** is not applicable in this instance.

The CCDP policies relevant to the Development are set out in **Table 2.1**. The Development has been evaluated against these in order to illustrate that they align with the relevant policies set out in the

CCDP. It should be noted that environmental and amenity considerations have been assessed in the EIAR and the findings confirm the Development is in compliance with the relevant objectives and policies in the CCDP.

Table 2.1: Relevant Planning Policies from The Cork County Development Plan 2022-2028

Chapter	Policy Details	Development Policy Appraisal
13	<p>ET 13.1 Energy</p> <p>a) <i>Ensure that County Cork fulfils its potential in contributing to the sustainable delivery of a diverse and secure energy supply and to harness the potential of the county to assist in meeting renewable energy targets and managing overall energy demand.</i></p> <p>b) <i>During the life of this plan, the Planning Authority will prepare a renewable energy strategy for the county.</i></p>	<p>The Development will make a significant and meaningful contribution to renewable energy targets in the county and harness the wind energy potential of the county</p> <p>The additional renewable energy that the Development will generate will help support Ireland's wider low carbon transition helping to meet the additional electrical demand created by electrification of the transport and heating networks and growing tech industry installations such as data centres.</p>
13	<p>ET 13.2 Renewable Energy</p> <p>a) <i>Support Ireland's renewable energy commitments as outlined in Government Energy and Climate Change policies by facilitating the development of renewable energy sources such as wind, solar, geothermal, hydro and bioenergy and energy storage at suitable locations within the county where such development has satisfactorily demonstrated that it will not have adverse impacts on the surrounding environment (including water quality), landscape, biodiversity or amenities.</i></p> <p>b) <i>Support and facilitate renewable energy proposals that bring about a direct socio-economic benefit to the local community. The Council will engage with local communities and stakeholders in energy and encourage developers to consult with local communities to identify how they can invest in/gain from significant renewable energy development.</i></p> <p>c) <i>Support the development of new and emerging renewable energy technologies / fuels for the transport sector.</i></p> <p>d) <i>To promote the potential of micro renewables where it can be demonstrated that that it will not have adverse impacts on the surrounding environment (including water quality), landscape, biodiversity or amenities.</i></p>	<p>The Policy wording of ET 13.2 recognises the opportunity to benefit from increased renewable energy generation with limited additional environmental impacts and this is consistent with the findings of the EIAR. The impact on the surrounding environment (including water quality), landscape, biodiversity or amenities is addressed in Policy 13.4 below.</p> <p>In Chapter 4 Population and Human Health the socio-economic impacts of the development are assessed in terms of impacts on the economy, employment and population. The overall impacts on population and human health have been assessed as having the potential to result in a moderate, positive, short-term impact during the construction and decommissioning phases and moderate, positive and long-term during the operational phase.</p>

Chapter	Policy Details	Development Policy Appraisal
<p>13</p>	<p>ET 13.4: Wind Energy</p> <p><i>In order to facilitate increased levels of renewable energy production consistent with national targets on renewable energy and climate change mitigation as set out in the National Energy and Climate Plan 2021-2030, the Climate Action Plan 2021, and any updates to these targets, and in accordance with Ministerial Guidelines on Wind Energy Development, the Council will support further development of on-shore wind energy projects including the upgrading, repowering or expansion of existing infrastructure, at appropriate locations within the county in line with the Wind Energy Strategy and objectives detailed in this chapter and other objectives of this plan in relation to climate change, biodiversity, landscape, heritage, water management and environment etc.</i></p>	<p>The Development meets the objectives set down in policy ET 13.4, by providing much needed renewable energy at a time when there is a pressing need to meet the Government ambitious 80% renewable electricity target by 2030 (9GW of onshore wind by 2030 and 6GW by 2025) as set out in the Climate Action Plan 2023.</p> <p>Wind Energy Strategy: The Development complies with the Wind Energy Strategy section 13.6.3 of the CDP; the Site is within a broad area that is deemed to be 'Open to consideration' for Wind Farms.</p> <p>Landscape; In Chapter 12 of the EIAR for the Development, the Landscape and Visual assessment concluded that the Development would not give rise to any significant adverse landscape or visual amenity effects (including residential amenity). The EIAR L&V chapter also considered effects upon "views and prospects" included in the CCDP. The findings demonstrate that the landscape can accommodate the Development without giving rise to significant adverse effects.</p> <p>Climate change; By producing renewable energy the Development contributes to mitigating climate change by reducing emissions from the energy sector. This is Fully assessed in Chapter 10: Air and Climate. A carbon calculator is also included in the assessment which finds the savings due to displacing fossil fuels in electricity generation range from 72,597 to 80,580 tonnes of carbon dioxide per annum.</p> <p>Biodiversity EIAR Chapters 5, 6 and 7 assesses the potential impacts and effects of the development on biodiversity while the report to inform screening for appropriate assessment and Natura Impact statement considers the potential impacts and effects on European (Natura 2000) sites. The mitigation measures set out in the Biodiversity chapter of the EIAR, in the Construction Environmental Management Plan (CEMP) and the Natura Impact Statement (NIS) will ensure that there will be no effects on sites designated for nature conservation as a result of the Project. This approach aligns with Objective BE 15-2 (a), (b), (c) and (e) of the development plan biodiversity policy.</p>

Chapter	Policy Details	Development Policy Appraisal
		<p>Heritage; There are two recorded archaeological sites within the Site, and these comprise a field boundary and a small, stone-built enclosure. Both of these archaeological sites been avoided and will be cordoned off for the duration of the Construction phase. There are no other known archaeological, architectural or cultural heritage remains within the footprint of the Development, and as such there will be no direct physical effects on any known archaeological or architectural heritage features during any phase of the Development. No significant indirect effects to heritage have been predicted. Standard construction mitigation has been proposed to further reduce any potential effects that could arise due to the discovery of any new items of archaeological value. The conclusions of the cultural heritage and archaeological assessment within the EIAR determined that the environment can accommodate the Development without giving rise to significant impacts on cultural heritage. This is Fully assessed in Chapter 14: Cultural Heritage</p> <p>Water management; All surface waters and groundwaters associated with the Site were considered sensitive and important attributes in their own right which must be protected in accordance with the Water Framework Directive to achieve and maintain at least 'Good' status. A comprehensive suite of drainage measures have been developed to protect all receiving waters from potential impacts during the construction, operation and decommissioning of the Development in the catchment of the Site and along the proposed Grid Connection Route. The assessment and associated proposed mitigation measures are in Chapter 6: Aquatic Ecology and Chapter 9: Hydrology and Hydrogeology. The Surface Water Management Plan (Appendix 2.1) details the site drainage that has been designed for the site using the principles of Sustainable Drainage Systems (SuDS). The drainage system for the Development is designed in a manner to ensure there are no changes to the baseline water quality within or downstream of the Site. With the implementation of mitigation measures and appropriate environmental engineering controls, the Development will not jeopardise any waterbody achieving good status under the WFD, nor will it result in</p>

Chapter	Policy Details	Development Policy Appraisal
		<p>the deterioration of any waterbody's status under the WFD. The findings demonstrate that the environment can accommodate the Development without giving rise to significant hydrological impacts.</p> <p>Environment; This is assessed throughout the EIAR</p>
13	<p>ET 13.5: Wind Energy Projects</p> <p>a) <i>Support a plan led approach to wind energy development in County Cork through the identification of areas for wind energy development. The aim in identifying these areas is to ensure that there are no significant environmental constraints, which could be foreseen to arise in advance of the planning process.</i></p> <p>b) <i>On-shore wind energy projects should focus on areas considered 'Acceptable in Principle' and 'Areas Open to Consideration' and generally avoid "Normally Discouraged" areas in this Plan.</i></p>	<p>The project is located in an area Open to Consideration in the CCDP as advised under policy 13.5b.</p> <p>The Development will add to The Cork County Council's renewable energy portfolio and contribute to climate change mitigation. It has been found not to have any (visual/noise/shadowing) significant adverse effect upon the amenity of any inhabited residential dwellings.</p> <p>The Development is located within an Area Open to Consideration in the County.</p> <p>The Development has been assessed against each of the environmental topics contained in the EIAR and adverse residual impacts are avoided.</p>
13	<p>ET 13.7 Open to Consideration</p> <p><i>Commercial wind energy development is open to consideration in these areas where proposals can avoid adverse impacts on:</i></p> <ul style="list-style-type: none"> • <i>Residential amenity particularly in respect of noise, shadow flicker and visual impact;</i> • <i>Urban areas and Metropolitan/Town Green Belts;</i> • <i>Natura 2000 Sites (SPA and SAC), Natural Heritage Areas (NHA's) or adjoining areas affecting their integrity and other sites of significant ecological value.</i> • <i>Architectural and archaeological heritage;</i> • <i>Visual quality of the landscape and the degree to which impacts are highly visible over wider areas.</i> 	<p>The Development is located in an area of the county which is open to consideration for commercial wind energy development.</p> <p>The Development, including the turbine parameters, has been assessed against each of the topics contained in the EIAR and adverse residual impacts are avoided.</p> <p>The EIAR submitted as part of the planning application has considered fully all the criteria listed under the following chapters:</p> <ul style="list-style-type: none"> • Chapter 3: Alternatives Considered • Chapter 4: Population and Human Health including Shadow Flicker • Chapter 5: Terrestrial Ecology • Chapter 6: Aquatic Ecology • Chapter 7: Ornithology • Chapter 8: Soils and Geology

Chapter	Policy Details	Development Policy Appraisal
	<ul style="list-style-type: none"> <i>In planning such development, consideration should also be given to the cumulative impacts of such proposals.”</i> 	<ul style="list-style-type: none"> Chapter 9: Hydrology and Hydrogeology Chapter 10: Air and Climate Chapter 11: Noise Chapter 12: Landscape and Visual Amenity Chapter 13: Material Assets and Other Issues Chapter 14: Cultural Heritage Chapter 15: Traffic and Transportation Chapter 16: Major Accidents & Natural Disasters <p>Residential Amenity;</p> <p>It has been shown that noise due to the Project, including cumulative effects with operational and consented wind farms will meet all current guidelines at all local properties. The closest inhabited dwelling is located over 740m from the nearest turbine. Chapter 11 addresses Noise and concluded that noise effects are not significant. The findings demonstrate that the environment can accommodate the Development without giving rise to significant noise impacts.</p> <p>A significant minimum separation distance from all occupied dwellings of over 740 m has been achieved with the project design. This assessment has identified the potential for shadow flicker to affect between 17 No. and 20 No. out of 39 No. receptors within the shadow flicker study area. Where significant shadow flicker effects are predicted to affect a sensitive receptor, these will be mitigated by adapting turbine control systems to stop the relevant turbine when shadow flicker conditions are present. In this instance, a shadow control system will be installed to eliminate potential for shadow flicker effects. The installation of a blade shadow control system on all wind turbines will eliminate shadow flicker impacts from the Development, therefore, removing cumulative shadow flicker impacts.</p> <p>In Chapter 12 of the EIA for the Development, the Landscape and Visual assessment concluded that the Development would not give rise to any significant landscape or visual amenity effects (including residential amenity). The EIA L&V chapter also considered effects upon “views and prospects” included in the CCDP. The findings demonstrate that the</p>

Chapter	Policy Details	Development Policy Appraisal
		<p>landscape can accommodate the Development without giving rise to significant effects or impacting residential amenity.</p> <p>Urban Areas and Metropolitan/Town Green Belts</p> <p>The Site is located within an agricultural and forested landscape outside of urban and metropolitan areas, and town green belts.</p> <p>Biodiversity</p> <p>Sites designated for nature conservation, such as Natura 2000 sites and Natural Heritage Areas, are considered in both the EIAR and NIS prepared for the Development. There are no sites designated for nature conservation within the Project site and as such the Proposed Development only poses a risk of indirect effects on such sites. The nearest designated Natural Heritage Area to the Development is Sillahertane Bog NHA, approximately 5.5 km south-west. The closest European (Natura 2000) site is Killarney National park, Macgillycuddy's Reeks & Caragh River Catchment SAC approximately 3 km south from the project site. Indirect adverse effects on Natura 2000 sites and NHA sites are not predicted to occur due to embedded mitigation and the implementation of mitigation measures such as timing of specific works to avoid disturbance, or potential mortality of species such as common lizard, the curtailment of turbines for bats at certain times of the year and in certain weather conditions and measures to avoid downstream pollution of watercourses. The Development design has been developed within the constraints of Project site including telecommunications, landscape, hydrology etc. The design has sought to avoid important ecological features where possible and where this has not been possible mitigation, compensation and enhancement measures have been employed to address the potential effect of the Development on the biodiversity of the Project site. While the Development will result in the loss of 2.5 ha of Annex I peatland habitats it will not result in adverse effects on Natura 2000 Sites (SPA and SAC), Natural Heritage Areas (NHA's) or adjoining areas affecting their integrity.</p> <p>Architecture and Archaeological Heritage</p>

Chapter	Policy Details	Development Policy Appraisal
		<p>There are two recorded archaeological sites within the Site, and these comprise a field boundary and a small, stone-built enclosure. Both of these archaeological sites have been avoided and will be cordoned off for the duration of the Construction phase. There are no other known archaeological, architectural or cultural heritage remains within the footprint of the Development, and as such there will be no direct physical effects on any known archaeological or architectural heritage features during any phase of the Development.</p> <p>The findings demonstrate that the environment can accommodate the Development without giving rise to significant impacts to cultural heritage.</p> <p>Cumulative impacts are assessed in each chapter.</p>
<p>13</p>	<p>ET 13-9: National Wind Energy Guidelines</p> <p><i>“Development of on-shore wind should be designed and developed in line with the ‘Planning Guidelines for Wind Farm Development 2006’ and ‘Draft Wind Energy Development Guidelines 2019’ and any relevant update of these guidelines.”</i></p>	<p>The Development is fully compliant with the DEHLG Wind Energy Development Guidelines 2006.</p> <p>Until the draft guidelines are published by the Minister in accordance with section 28, the applicable guidelines are the 2006 Wind Energy Development Guidelines. When the revised guidelines are published by the Minister, Cork County Council will be obliged to have regard to the guidelines when making their decision on the application for planning permission.</p> <p>The Development takes cognisance of this policy. Following feedback received by the Dept. during the public consultation period, the Draft Guidelines have not been progressed or adopted to date.</p> <p>In relation to the Draft Wind Energy Development Guidelines 2019 the following is of note:</p> <ul style="list-style-type: none"> • Noise impacts are assessed in Chapter 11: Noise and are in line with the 2006 Wind Energy Development Guidelines. • The layout has achieved a minimum separation distance of 740m (4x the turbine height) between turbine locations and the closest inhabited houses in line with the Draft guidelines. • To avoid shadow flicker at inhabited houses, assessment and mitigation measures have been included in the Development. The

Chapter	Policy Details	Development Policy Appraisal
		<p>mitigation measures (turbine controlling technology -, Scada system) can comply with the draft guidelines, should they come into effect. Full details of this can be found in Chapter 4: Population and Human Health.</p> <ul style="list-style-type: none"> Community engagement is emphasized in the Draft Guidelines. The project Community Liaison Officer's initial engagement commenced in August 2020 which included direct engagement by calling to all the houses within 2 km of the study area and providing information on the Project. In 2021 and 2022, newsletters were distributed to the local community to provide an update on Project progress and explain how local people would be consulted going forward. which was followed again with an In early 2023, the community were invited to engage with the Virtual Tour and Public Consultation Process. The Project held a Public Information Event including on-site clinic open days on 20th and 21st April 2023 in Coolea Village Hall, Coolea, Co. Cork. The Proposed Development will provide a community benefit fund of €500,000 per annum for the first 15 years of operation.
<p>13</p>	<p>ET 13-10: Development in line with Best Practice</p> <p><i>“Ensure that wind energy developments in County Cork are undertaken in observance with best industry practices, and with full engagement of communities potentially impacted by the development. In accordance with the Code of Practice ‘Good Practice for Wind Energy Development Guidelines 2016’, wind energy development operators are required to put in place an effective complaints procedure in relation to all aspects of wind energy development projects, where members of the public can bring any concerns they have about operational difficulties, including noise and nuisance to the attention of the wind energy development operator.”</i></p>	<p>The design and environmental assessment of the Development has been undertaken to consider all extant, and emerging policy, guidance and best practice on wind energy development.</p> <p>In accordance with the Code of Practice ‘Good Practice for Wind Energy Development Guidelines 2016’ significant community engagement has taken place. The project Community Liaison Officer's initial engagement commenced in August 2020 which included direct engagement by calling to all the houses within 2 km of the study area and providing information on the Project. In 2021 and 2022, newsletters were distributed to the local community to provide an update on Project progress and explain how local people would be consulted going forward. In early 2023, the community were invited to engage with the Virtual Tour and Public Consultation Process. The Project held Public Information Days (PIDs) including on-site clinic open days on 20th and 21st April 2023 in Coolea Village Hall, Coolea, Co. Cork.</p>

Chapter	Policy Details	Development Policy Appraisal
		<p>Communication with the local community has been delivered through providing Newsletters, having a dedicated project website for all to access, an Introduction letter to FuturEnergy Ireland, Project update letter, Detailed project brochure, Virtual Tour, Media releases, Advertisements, Posters, Sponsored Educational programs, PID'S (Elected representatives meeting, a Webinar and on-site local clinic). All communications materials have contact details and provided easy ways of accessing the project team. After both the Webinar and the On-Site engagement Clinic had taken place any queries and questions that arose were replied to by the project team.</p> <p>A complaints process to address concerns from members of the public will be in place for the duration of the construction, operation, and decommissioning phases.</p>
13	<p>ET 13-11: Public Consultation and Community Support</p> <p><i>(a) Require wind energy developers to carry out active public consultation with the local community in advance of and in addition to the statutory public consultation required as part of the planning application process.</i></p> <p><i>(b) Applications for large scale wind energy development require a 'Community Report' with the planning application documents detailing the full extent of community and wider public engagement.</i></p>	<p>In accordance with the Code of Practice 'Good Practice for Wind Energy Development Guidelines 2016', active public consultation was carried out with the local community during the period August 2020 to May 2023.</p> <p>A community report has been prepared and is included with the planning application detailing the full extent of community and wider engagement.</p> <p>Some highlights from the report include:</p> <ul style="list-style-type: none"> • The project Community Liaison Officer's initial engagement commenced in August 2020 which included direct engagement by calling to all the houses within 2 km of the study area and providing information on the Project. • In 2021 and 2022, newsletters were distributed to the local community to provide an update on Project progress and explain how local people would be consulted going forward. • In early 2023, the community were invited to engage with the Virtual Tour • The Project held Public Information Days (PIDs) including on-site clinic open days on 20th and 21st April 2023 in Coolea Village Hall, Coolea, Co. Cork.

Chapter	Policy Details	Development Policy Appraisal
		<ul style="list-style-type: none"> • Communication with the local community has been delivered through providing Newsletters having a dedicated project website for all to access, an Introduction letter to FuturEnergy Ireland, Project update letter, Detailed project brochure, Virtual Tour, Media releases, Advertisements, Posters, Sponsored Educational programs, PID'S (Elected representatives meeting, on-site local clinic). • All project communications materials had contact details and provided easy ways of accessing the project team. • Following both the Webinar and the On-Site Clinic open days, all queries and questions that arose were replied to by the project team. Some questions for information were logged and when the information become available it was provided. <p>In addition to helping Ireland reduce environmentally damaging fossil fuel emissions and helping avoid significant fines from the EU, Inchamore Wind Farm will also contribute positively to the national and regional economy.</p> <p>The Project has the potential to bring significant positive benefits to local communities. It will support sustainable local employment; it will contribute annual rates between €280,000 to €330,000 to the local authority; and it will provide opportunity for local community investment in the project in line with the new Renewable Energy Support Scheme (RESS). This is a Government of Ireland initiative that provides support to renewable energy projects in Ireland. A Community Benefit Fund will be put in place for the RESS period (i.e., 15 years of the operation) of the Project to provide direct funding to those areas surrounding the Project. The significant annual community benefit fund will be established in line with Government policy which will include funding for both wider community initiatives and a Near Neighbour scheme focused on houses in close proximity to the Project.</p>

2.3 **Wind Energy Strategy**

County Cork's Wind Energy Strategy is contained in section 13.6.7 of the CCDP and includes a sieve mapping analysis to identify the most suitable areas for wind energy development. The Site is within a broad area that is deemed to be 'Open to consideration' for wind energy developments (i.e. neither 'Normally discouraged' nor 'Acceptable in principle' nor an 'Urban Area'). See **Figure 2.1 below**.

According to the strategy 'Open to consideration':

"comprises almost 50% of the County area. Within these areas there are locations that may have potential for wind farm developments but there are also some environmental issues to be considered. This area has variable wind speeds and some access to the grid..."

ET 13-7: Open to Consideration (CDP Objective):

Commercial wind energy development is open to consideration in these areas where proposals can avoid adverse impacts on:

- *Residential amenity particularly in respect of noise, shadow flicker and visual impact;*
- *Urban areas and Metropolitan/Town Green Belts;*
- *Natura 2000 Sites (SPA and SAC), Natural Heritage Areas (NHA's) or adjoining areas affecting their integrity and other sites of significant ecological value.*
- *Architectural and archaeological heritage;*
- *Visual quality of the landscape and the degree to which impacts are highly visible over wider areas.*

In planning such development, consideration should also be given to the cumulative impacts of such proposals."

Residential amenity, urban areas, archaeology and Sites Designated for Nature Conservation such as Natura 2000 sites, are all addressed in **Table 2.1** above. Protection of the Natura 2000 network is further dealt with under Development Policy Appraisal for policy 15-2 in table 2.1 above. Based on the landscape, visual and cumulative assessment which can be found in Chapter 12 Landscape and Visual Amenity, it is considered that there will not be any significant effects arising from the proposed Inchamore Wind Farm. The Development is in compliance with the Cork CDP Landscape Policies, including Objective GI 14-10 which requires the management of development in the county consider the relevant landscape character, its distinctiveness and sensitivity in regard to the designations in the Cork County Draft Landscape Strategy and protect High Value Landscapes. The Site has been assessed against this criteria in Chapter 12, is not situated in, or in proximity to, an area recognised as a 'High Value Landscape' (HVL). Impacts to scenic routes, important views and prospects are considered not significant, in line with policy GI 14-12, GI 14-13 and GI 1413. This is due in part to the Development's modest overall scale and extent along with the enclosed nature of the rugged landscape that includes broad scale forestry, farming and existing wind energy developments in the surrounding area which means the Development appears well assimilated in terms of both scale and function in such views.

Environmental issues have been considered throughout the EIAR processes, as effects have been identified, mitigation has been applied to reduce impacts and enhance positive benefits. The findings of the EIAR technical chapters demonstrate that the environment can accommodate the Development without giving rise to significant adverse residual effects including cumulative effects.

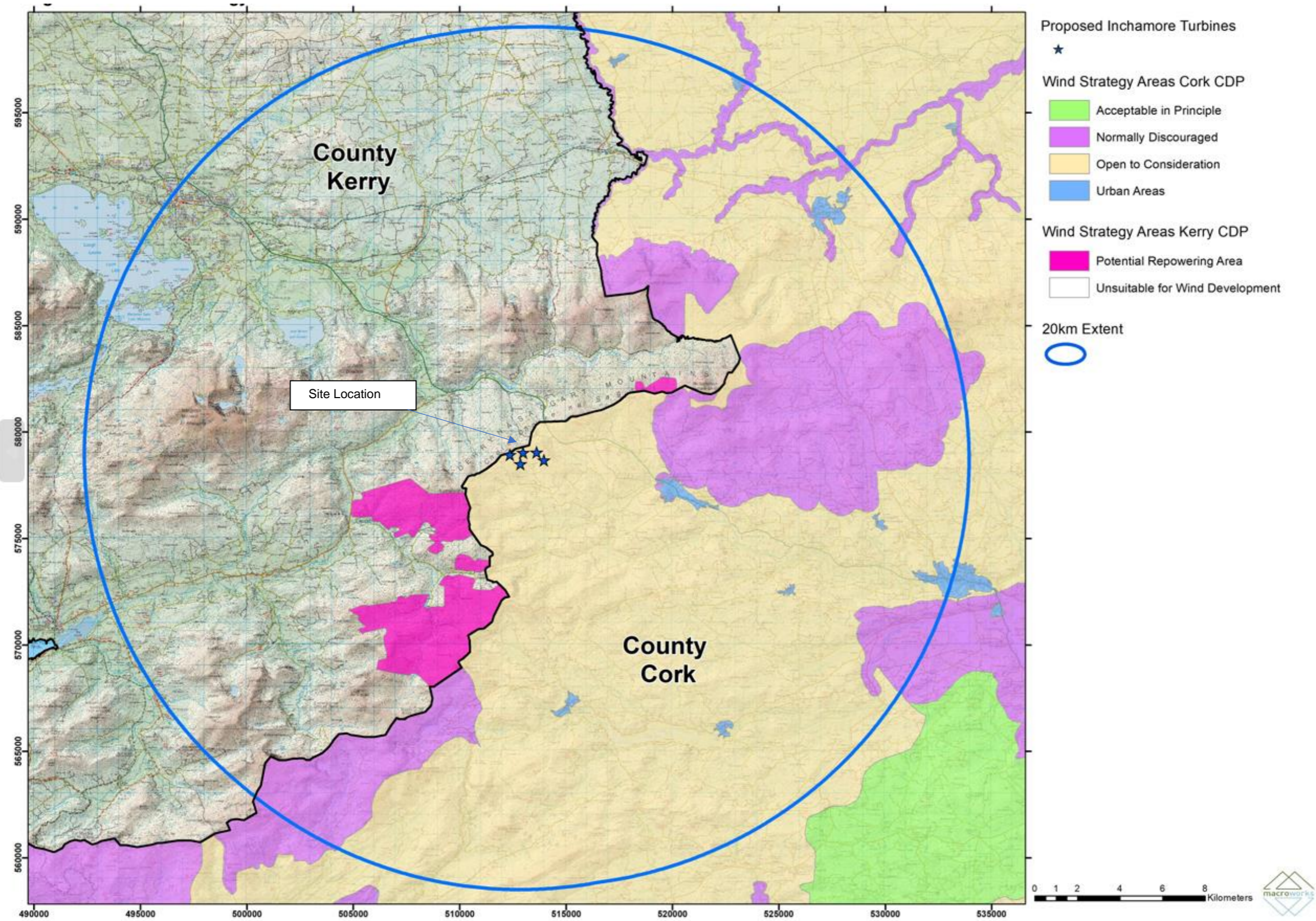


Figure 2.1: Wind Farm Designations (Map Extract Taken from The Cork CDP 2022-2028 and Kerry CDP 2022-2028)

2.4 **The Kerry County Development Plan 2022 – 2028**

Part of the Project is in Co. Kerry; specifically works required to accommodate construction traffic and turbine delivery. The following section addresses how the Project complies with the relevant policies in the Kerry CDP.

The Kerry County Development Plan 2022 – 2028 was adopted on the 7th of July 2022. The plan recognises the critical importance of energy production and distribution to the continued development and expansion of employment in the county.

It states:

“The development of secure and reliable electricity transmission infrastructure is also recognised as a key factor for supporting economic development and attracting investment to the County. The Council supports the development of a safe, secure and reliable supply of electricity and to support and facilitate the development of enhanced electricity networks and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this plan under EirGrid’s (2017) Grid Development Strategy.”

Of particular relevance to the Development is Policy KCDP 12-1:

“Support and facilitate the sustainable provision of a reliable energy supply in the County, with emphasis on increasing energy supplies derived from renewable resources whilst seeking to protect and maintain biodiversity, archaeological and built heritage, the landscape and residential amenity and integration of spatial planning and energy planning in the county.”

Part of the underground grid connection is located in County Kerry (although this is not part of the proposed development and is not being applied for it form parts of the overall project), this aspect of the Project will contribute to this policy objective by enabling an energy supply from a renewable resource and enhancing the electrical grid network in the county.

Part of the site boundary aligns with the county boundary between Cork and Kerry. Given the proximity of the wind turbines to Kerry, it is considered relevant to examine the energy policies and landscape policies/designations in the current Kerry County Development Plan (KCDP).

A landscape review has been included as part of the Kerry County Development Plan 2022-2028. Within this, the landscape is classified by landscape types and landscape character areas. The parts of County Kerry located within the Landscape and Visual Impact Assessment study area are predominantly contained within the landscape ‘Type A – Mountains’, ‘Type B – Pasture with Drystone Walls and Hedgebanks’ and ‘Type D - Coniferous Plantation’. The nearest and most relevant landscape character areas are ‘LCA 27 – Clydagh River, The Paps and the Derrynasaggart Mountains’ and ‘LCA 40 Bonane and Sheen River Valley’. Both of these landscape character areas have been classified with an overall sensitivity of ‘medium / high’.

Relevant policy in relation to landscape includes:

Policy ZL-1KCDP 11-70: *Protect the landscape of the County as a major economic asset and an invaluable amenity which contributes to the quality of people's lives.*

Policy KCDP 11-71: *Protect the landscapes of the County by ensuring that any new developments do not detrimentally impact on the character, integrity, distinctiveness or scenic value of their area. Any development which could unduly impact upon such landscapes will not be permitted.*

The areas in County Kerry adjacent to the Development have been designated as a 'Visually Sensitive Area'. This designation covers much of the upland and coastal rural landscapes of the County.

Chapter 12 of the EIAR; Landscape and Visual Amenity, considered a Study Area to assess the impacts of the Development. There are numerous Co. Kerry designated views and prospects scenic designations within this study area. Section 11.6.5 of the current Kerry CDP pertains to Views and prospects. It states:

"County Kerry contains areas of outstanding natural beauty which are recognised internationally. There is a need to protect and conserve views and prospects adjoining public roads throughout the County. These views and prospects are important to the amenity of the County and to its tourist industry".

Assessment of the Kerry County Development Plan in Chapter 12 of the EIAR has found:

- In the study area, there is one Co. Kerry designated view/prospect 1.4 km, at its closest point, north of the location of the nearest turbine.
- 10-20 km from the Site, there are four further Co. Kerry designated views/prospects, ranging from 8-16 km from the location of the nearest turbine.

The Landscape and Visual Impact Assessment in Chapter 12 of the EIAR assessed the impact of the Development against designated views and prospects in County Kerry and the impact to the overall landscape in County Kerry based on the sensitivity of the adjoining area, as defined in the Kerry County Development Plan. It found that the Development is of a modest overall scale and extent and is viewed within scenes that include broad scale forestry, farming and wind energy developments. The assessment found the Development appears well assimilated in terms of both scale and function in such views and does not have significant adverse effects. Furthermore, the enclosed nature of the rugged landscape in the surrounding landscape reduces the effect of the Development and there are few notable impacts at centres of population, along major routes and on local community views. The assessment concludes that the Development will not give rise to any significant adverse effects on any landscape or visual receptors in County Kerry, taking in to account the sensitivity of the landscape as dictated by the Kerry County Development Plan.

The part of the Project in Co. Kerry specifically relates to works required to accommodate construction traffic and turbine delivery. Chapter 14 of the Kerry County Development Plan is titled "Connectivity",

aims to maintain and provide additional key infrastructure and to enhance regional and county connectivity. The relevant policies to the Project are;

Policy KCDP 14-29: *“Protect the capacity and safety of the National Road and Strategically Important Regional Road network in the County and ensure compliance and adherence to the provisions of official Government policy outlined in the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012) in order to safeguard carrying capacity and safety of National Primary and Secondary Routes and associated national road junctions”*

And

Policy KCDP 14-30 *“Avoid the creation of any additional access point from new development or the generation of increased traffic from existing accesses to National Roads to which speed limits greater than 60 km/h apply. This provision applies to all categories of development, including individual houses in rural areas, regardless of the housing circumstances of the applicant.”*

The access is an existing access to the N22. With reference to Section 2.6 of the Spatial Planning and National Roads Planning Guidelines (DoECLG, 2012), the Project will see the temporary increase in traffic volumes for the 21-months of the construction phase at the already existing entrance off the N22, after which the operational phase effects (traffic levels) will be negligible. Chapter 15 of the EIAR; Traffic and Transport, assesses the impacts on the national road. The majority of deliveries will be made during an 11-month period, with an average of 7 to 9 deliveries per day and with number of deliveries estimated to peak at approximately 150 deliveries per day during turbine foundation concrete pours for approximately 6 days. The Traffic and Transport impact assessment in Chapter 15 concludes that with mitigation the effect is minor to negligible, negative and short-term in nature during the construction phase only and this is in line with policy KC14-30. The capacity and safety of the national road will be protected at all times in line with policy KCDP 14-29. The implications for safety have been assessed in a Road Safety Audit which has been appended to **EIAR Chapter 15: Traffic and Transportation**

In conclusion, the Project complies with Kerry County Development Plan 2022-2028 policies KCDP 12-1, which relates to electrical infrastructure, ZL-1KCDP 11-70 and KCDP 11-71 which relates to landscape and KCDP 14-29 and KCDP 14-30 in relation to roads. In more broad terms the Kerry County Development Plan 2022-2028's 'vision' includes providing for the development of County Kerry as a sustainable place to live, the plan generally supports renewable energy and the wider transition to a climate neutral society. The Development, by producing renewable wind energy is inline with the strategic vision and objectives of the plan.

Kerry Wind Energy Strategy:

The Wind Energy Strategy in the closest portion of County Kerry to the Site, designates the adjoining lands as unsuitable for wind in the recently adopted 2022-2028 CDP. There are no turbines proposed

in Co. Kerry. The impacts of the Development on the adjoining area in Co. Kerry primarily relate to landscape and visual impacts and are assessed in Chapter 12 of the EIAR; the assessment finds that there are no significant adverse effects from the Development on County Kerry in term of landscape policy.

2.5 Conclusions of Development Plan Policy Appraisal

The Development's contribution of between 28 - 33 MW of renewable electricity, supports investment in sustainable energy production and associated infrastructure in Cork and Kerry and is in line with overarching objectives of both County Development Plans. The Development will also provide jobs, economic development and, in conjunction with the community development fund, will result in positive socio-economic impacts, which is also in line with the objectives of the Cork and Kerry CDPs.

The Development also meets the requirements Cork and Kerry County Development Plans' to not have adverse impacts on the surrounding environment, including water quality, landscape, biodiversity or amenities.

In this regard, the development is in an Open to Consideration area in Co. Cork and complies with the objectives of this by avoiding adverse impacts, including cumulative impacts, on residential amenity; urban areas and Metropolitan/Town Green Belts; Natura 2000 Sites (SPA and SAC), Natural Heritage Areas (NHA's) or adjoining areas; architectural and archaeological heritage; visual quality of the landscape and the degree to which impacts are highly visible over wider areas.

Part of the proposed development is in Co. Kerry, specifically works required to accommodate construction traffic and turbine delivery. These works comply with the relevant policies in the Kerry CDP.

The Wind Energy Strategy in the closest portion of County Kerry to the Site, designates the adjoining lands as unsuitable for wind in the recently adopted 2022-2028 CDP. All turbines are outside this area and located in County Cork. The Landscape and Visual Impact Assessment in Chapter 12 of the EIAR assessed the impact of the Development against designated views and prospects in County Kerry and the impact to the overall landscape in County Kerry. The assessment concludes that the Development will not give rise to any significant adverse effects on landscape and visual receptors in County Kerry, taking in to account the sensitivity of the landscape as dictated by the Kerry County Development Plan.

It should be noted that the Development complies with the 'Planning Guidelines for Wind Farm Development 2006' and has had regard to the 'Draft Wind Energy Development Guidelines 2019'. In this regard to achieve the goal of maximising the potential for wind energy development in pursuance of national targets for renewable energy, the Wind Energy Guidelines highlight that securing community and therefore public acceptance of wind energy is important. Suitable and early community engagement formed a key part of the design and planning phase of the Development. This also mirrors objectives and policies set out in the in the CCDP and KCDP.

Ireland is in a climate crisis and the establishment of low carbon economies through increased renewable energy generation is now a time-critical consideration underpinning the development of the Country as a whole. This issue is emphasised in both Cork and Kerry's County Development plans. Chapter 14; Climate Action is included in the Cork CDP and Chapter 2 in the Kerry CDP is Climate Change & Achieving a Sustainable Future. By displacing fossil fuels with renewable wind energy, the Development contributes towards the policies in these chapters. In addition to the Proposed Development's contribution to achievement of the national climate targets, it also offers potential key capacity to address recent issues identified in relation to security of electricity supply. Energy security is of vital importance, particularly considering the ongoing geopolitical conflicts. The Proposed Development represents an opportunity to make a meaningful contribution to Ireland's energy security.

3 KEY ENVIRONMENTAL MATTERS

3.1 Introduction

The planning application should be considered on the basis of the proper planning and sustainable development of the area including the likely effects of the Development on the environment.

During the EIA scoping with key consultees and consultation with the public, three key recurring environmental considerations emerged, these are:

- Landscape
- Biodiversity
- Residential amenity

These topics have been discussed in preceding sections of this statement, however, they are grouped here to provide further detail.

3.1.1.1 *Landscape*

The Development is in an area designated as "Open to Consideration" for wind farms in the Cork County CDP Wind Energy Strategy. The landscape and visual impact assessment (LVIA) in Chapter 12 of the EIAR assesses the impacts of the Development in relation to the Cork CDP and Kerry CDP.

The main landscape impacts relate to changes in landscape character during the operational stage principally from the presence of the proposed turbines. In terms of scale and function, the proposed wind farm is well assimilated within the context of the surrounding area. This is due to the broad scale of the landforms, landscape elements and land use patterns. These attributes prevent the height and extent of the proposed wind farm causing the type of scale conflict that can occur in more intricate landscape areas. The rugged hills and ridges in the immediate surrounds of the Site have a notable utilitarian character due to the presence of the existing wind energy developments, in addition to extensive tracts of commercial conifer plantation. Although the Development represents a stronger human presence and level of built development than currently exists on the Site, it will not detract

significantly from its productive upland rural character, which wind turbines are already a key component of.

The most impacted receptor types were designated scenic routes as there is a high density of them within the surrounding area and they often represent Local Community views as well (those within 5km).

There are three Co. Cork scenic routes:

- “Scenic Route S23: Road between Macroom and Derrynasaggart Mountains,” located approx. 1.1 km northeast of the location of the nearest turbine.
- “Scenic Route S24: Road between Coolea and Coom,” located within approx. 2.8 km south of the location of the nearest turbine.
- “Scenic Route S25: Winding road joining Coolea - Coom road to Lissacresig road,” located approx. 4.7 km south of the location of the nearest turbine.

On the basis that the scheme is of a modest overall scale and extent and is present in views from these scenic routes that include broad scale forestry farming and wind energy developments, the Development appears well assimilated in terms of both scale and function. When broad elevated views are presented, the views tend to be oriented away from high ground towards lower lying areas with the wind farm peripheral or even behind the viewer.

Based on the landscape, visual and cumulative assessment detailed within Chapter 12, it is considered that there will not be any significant effects arising from the proposed Inchamore Wind Farm. For these reasons and the details given in the landscape chapter, the Development has been assessed as being compliant with the Cork County landscape policy as outlined in the CDP.

3.1.1.2 Biodiversity

EIAR Chapters 5, 6 and 7 assesses the potential impacts and effects of the development on biodiversity. Surveys were carried out to identify and evaluate the importance of ecological features present within the study area. There are no sites designated for nature conservation within the Project site and as such the Proposed Development only poses a risk of indirect effects on such sites. The nearest designated Natural Heritage Area to the Development is Sillahertane Bog NHA, approximately 5.5 km south-west. The closest European (Natura 2000) site is Killarney National park, Macgillycuddy's Reeks & Caragh River Catchment SAC is approximately 3 km south from the project site. The mitigation measures set out in the Biodiversity chapter of the EIAR, in the Construction Environmental Management Plan (CEMP) and the Natura Impact Statement (NIS) will ensure that there will be no effects on sites designated for nature conservation as a result of the Project. This approach aligns with **Objective BE 15-2 (a)** by protecting all natural heritage sites which are designated or proposed for designation under European legislation, National legislation and International Agreements.

Mitigation measures are embedded into the design to protect habitats and species including minimisation of the works footprint and siting to avoid sensitive ecological features. Mitigation by avoidance for protected species includes timing of specific works to avoid disturbance, or potential mortality of species such as common lizard, the curtailment of turbines for bats at certain times of the year and in certain weather conditions and measures to avoid downstream pollution of watercourses. This approach aligns with **Objective BE 15-2 (b)** Providing protection to species in line with relevant legal requirements.

The proposed wind farm will result in the loss of 2.5 ha of a mosaic of dry heath, wet heath, outcropping silicious rock and some blanket bog (all Annex I listed habitats) resulting in significant residual effects (after mitigation). The residual effects of the 2.5 ha of habitat loss will be offset by the enhancement and management of 10.8 ha of peatland habitats, such as wet heath and degraded blanket bog, in an area west of the site redline boundary. This area of peatland habitats is contiguous with peatland habitats in the wider landscape providing ecological and landscape connectivity. The habitat management and enhancement measures will improve the quality of the degraded peatland habitats through the restoration of the structure and function of the habitats. These measures will also benefit ground nesting birds typically associated with peatland habitats in addition to improving floral diversity and habitat quality for protected species such as common lizard. Habitat management and enhancement measures are proposed as compensation for habitat loss and to achieve a net gain for biodiversity. Important documents in the delivery of these are the Habitat Construction Environmental Management Plan (which sets out work approaches and requirements during construction to avoid downstream water quality impacts), and a Surface Water Management Plan to ensure no long-term impacts on water quality within the freshwater pearl mussel catchment. This approach aligns with **Objective BE 15-2 (c)** to protect and where possible enhance areas of local biodiversity value, ecological corridors and habitats that are features of the County's ecological network and **Objective BE 15-2 (e)** to encourage the protection and enhancement of features of the landscape, such as traditional field boundaries, important for the ecological coherence of the Natura 2000 network and essential for the migration, dispersal and genetic exchange of wild species.

There are no Geological Heritage sites within in the Project site with the closest such site 6.6 km southeast of the Development. There is no risk of any effects on these sites and thus policy **Objective BE 15-2 (d)** is not applicable in this instance.

3.1.1.3 Residential Amenity

A significant minimum separation distance from all occupied dwellings of over 740m has been achieved with the Project design in line with the 2006 Wind Energy Guidelines. There are 39 dwellings within a 2 km radius of the proposed turbines, comprising one off houses and farm holdings.

The shadow flicker assessment has identified the potential for shadow flicker to affect a number of receptors within the shadow flicker study area. This will be mitigated using a shadow control system, installed on all turbines to reduce the potential for shadow flicker from the Development.

This brings the development in line with the DoEHLG 2006 Guidelines limit (30 hours per year or 30 minutes per day). The Development can be brought in line with the requirements of the 2019 draft guidelines, should they be adopted while this application is in the planning system, through the implementation of the mitigation measures outlined herein.

The main sound heard from wind turbines is the 'swish' from the movement of the blades through the air. Modern turbines are designed to minimise noise and planning conditions are used to ensure compliance with specified noise limits. Chapter 11 assesses noise and vibration, it shows that noise due to the Project, including cumulative effects with operational and consented wind farms will meet all the 2006 Wind Energy Guidelines at all local properties.

4 **ECONOMIC IMPORTANCE OF THE DEVELOPMENT**

The Development would represent a strategically significant investment in the locality of Cork and Kerry and the wider southern region. The Development will provide a multi-million euro benefit to both the Irish and local economies. The Development provides the opportunity to reinforce the existing local renewable energy industry knowledge and skills base, providing the stability and diversity to the rural economy that can stimulate further industry investment to take place.

The influence of the Development to the de-carbonisation of the electricity network will contribute positively to an issue of strategic social importance. This is illustrated by the text of the Irish government's recent Climate Action Plan 2023 which sets an ambitious 80% target for electricity production from renewable sources by 2030 and highlights the need to remove barriers to the development of renewables, including onshore wind, such as streamlining regulation and encouraging reinforcement of the grid to facilitate greater renewables penetration. The significance of the action plan is underlined by the Irish government's recent declaration of a climate emergency.

The RSES recognises and aims to support the many opportunities for wind as a major source of renewable energy. It declares that opportunities for both commercial and community wind energy projects should be harnessed, having regard to the requirements of the 2006 DoHPLG Guidelines on Wind Energy.

As a form of sustainable energy, and with an output level of up to between 28 and 33MW, the Development will contribute to the renewable energy targets in County Cork and in the Southern Regional Assembly Area.

The Development will be a significant regional project providing a sizable economic benefit through local investment, employment, local authority rates, and a local community benefit funds in accordance with Government, regional and local planning policies.

Wind Energy Ireland produced a report on The Economic Impact of Onshore Wind in Ireland¹³ below which illustrated that the onshore wind industry in 2020 supported over 5000 jobs and by 2030 there is a potential to increase this to over 7000, as shown **Figure 4.1**. The report also outlines the current benefits of onshore wind along with how far Ireland has to go to reach binding targets. Note that the installed capacity needs to nearly double within in a ten year period.

¹³ WEI. (2021). The Economic Impact of Onshore Wind in Ireland <https://windenergyireland.com/images/files/economic-impact-of-onshore-wind-in-ireland.pdf> Accessed 29/03/2023

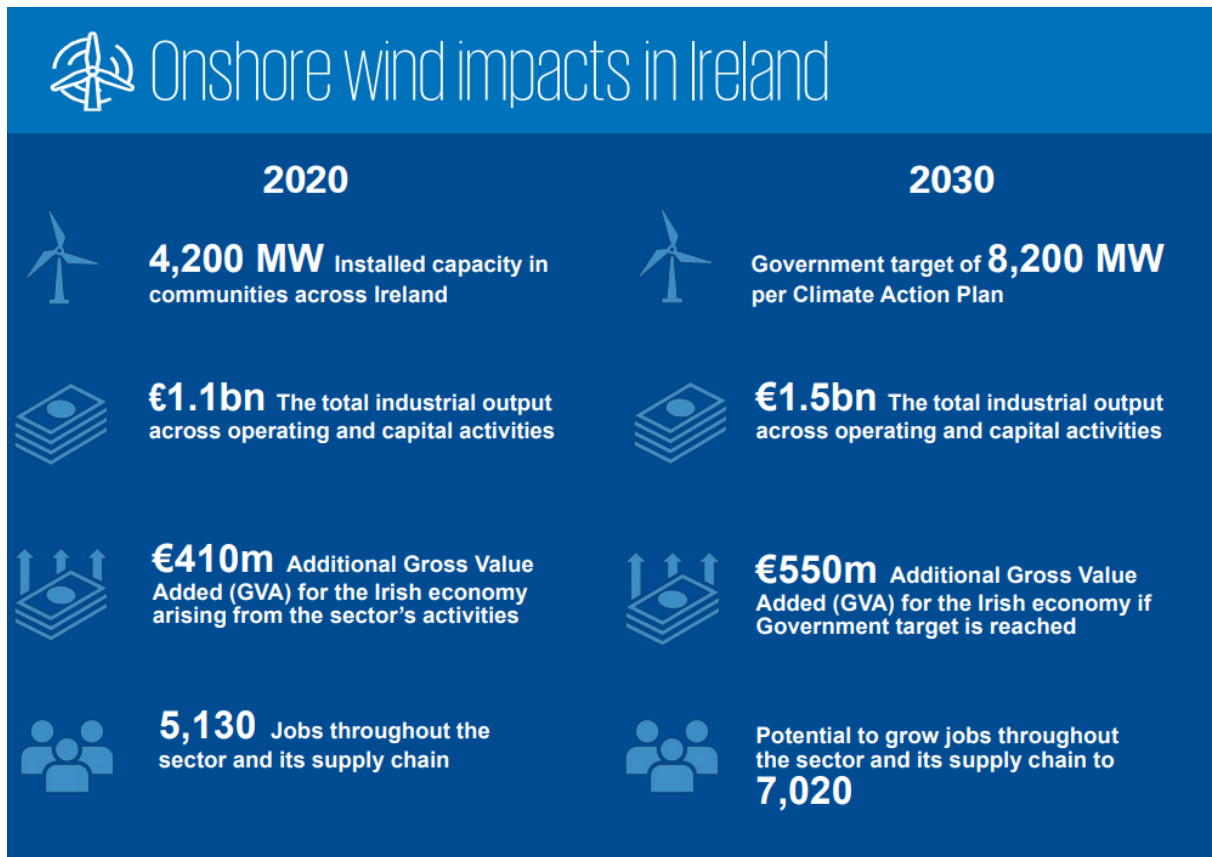


Figure 4.1: Onshore Wind Impacts in Ireland (From The Economic Impact of Onshore Wind in Ireland Figure 1.6)

The construction of the Development will positively contribute to the regional economy bringing investment and jobs that will help to support and retain confidence in the key regional industries of construction and renewable energy. This is assessed in Chapter 4 Population and Human Health.

5 THE DEVELOPMENT AS SUSTAINABLE DEVELOPMENT

The Development could not be a better example of sustainable development, enshrined in the National Planning Framework. There are three facets to sustainable development which are economic, social and environmental. The Development meets each of the three facets of sustainable development as laid out in **Table 5.1**.

Table 5.1: The Development as Sustainable Development

Sustainability Role	<p>¹⁴ The three facets of sustainable development are economic, social and environmental. Sustainable Development can be defined as “<i>Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.</i>”</p>
Economic Role	<p>The Development provides the opportunity to reinforce the existing local renewable energy industry knowledge and skills base by providing new jobs in the industry, providing the stability and diversity to the rural economy that can stimulate further development by attracting new business to the region due to the improved supply of electricity, enabling diversification. The Development will have had a positive economic impact with several Irish firms commissioned to work on the design, environmental assessment and planning. The construction and operational phases will also create jobs locally and nationally and will lead to further economic development.</p> <p>The Development represents a strategically significant investment in the locality</p>
Social Role	<p>The influence of the Development to the de-carbonisation of the Irish electricity network will contribute positively to an issue of strategic social importance. This is illustrated by the Climate Action Plan 2023 which sets an 80% target for electricity production from renewable sources by 2030 and highlights the need to remove barriers to the development of renewables, including onshore wind, such as streamlining regulation and encouraging reinforcement of the grid to facilitate greater renewables penetration. The significance of the action plan is further underlined by the Irish government’s recent declaration of a climate emergency.</p> <p>The deployment of modern, efficient wind turbine technology, which is currently the cheapest form of new generation, will also contribute to reducing the cost of energy and benefit Irish consumers through lower energy prices.</p> <p>The Project has the potential to bring significant positive benefits to local communities. It will support sustainable local employment; it will contribute annual rates between €280,000 to €330,000 to the local authority; and it will provide opportunity for local community investment in the project in line with the new Renewable Energy Support Scheme (RESS). This is a Government of Ireland initiative that provides support to renewable energy projects in Ireland. A Community Benefit Fund will be put in place for the RESS period (i.e., 15 years of the operation) of the Project to provide direct funding to those areas surrounding the Project. The significant annual community benefit fund will be established in line with Government policy which will include funding for both wider community initiatives and a Near Neighbour scheme focused on houses in close proximity to the Project. The additional renewable energy that the Development will generate will help support Ireland’s wider low carbon transition. It will help to meet the additional electrical demand that will be created by the electrification of the transport and heating networks and the growing tech industry installations such as data centres.</p>

¹⁴ Bruntland Report 1987

Environmental Role	<p>The Development has been assessed by the EIA process in terms of its impact on the environment, where impacts have been identified, the design has been amended and mitigation implemented to avoid, prevent and reduce adverse impacts and maximise positive impacts.</p> <p>Approximately 72,043 to 80,026 tonnes of carbon dioxide will be displaced per annum by the Development. This helps to mitigate climate change and will have a positive impact on the environment.</p> <p>The habitat enhancement and management measures proposed for 10.6 ha of degraded, cutover and eroding bog will provide increased diversity of species, habitat connectivity and ecological links with the wider landscape. The proposed enhancement and management measures will encourage peatland species such as Red Grouse, (Red-listed), Snipe (Red-listed), Meadow Pipit (Red-listed) and Irish Hare to use the area selected.</p>
---------------------------	--

The Development has been conceived and designed to align within the planning and sustainable development objectives of the local area. The success of this is documented in comprehensive detail through the EIAR and illustrated in **Table 2.1** which shows accordance with the provisions of the Cork County Development Plan.

The application documents and EIAR show that the Development provides an excellent opportunity to stimulate continued and additional investment to maximise beneficial impact towards national targets, while also minimising the resulting environmental effects.

6 **CONCLUSION**

The Development will contribute to Ireland's indigenous renewable energy generation, which, in the context of the ongoing climate emergency, is an urgent Irish national priority that must be given significant weight based on national and international policies.

Ireland faces significant challenges to its efforts to meet EU and national legally binding targets for renewable energy by 2030, and its commitment to transition to a low carbon economy by 2050. The Irish government has committed to increasing the share of renewables electricity up to 80% by 2030 and targeting 9 GW of onshore wind by 2030. The Development will sustain and contribute (between 28 - 33 MW) towards Ireland's legally binding targets for reductions in CO₂ and produce energy from native and renewable resources.

It is concluded in this planning statement that the Development fully accords with International policies, National Planning Policy, Regional Planning Policy and the Cork and Kerry County Development Plan policies and objectives. In this regard, the Development:

- Is in an area designated "Open to Consideration" for Wind Farms in Cork;
- Contributes 28 MW to 33 MW of renewable wind energy to the national CAP2023 target of 9 GW by 2030, helping to reduce the current 4.7 GW shortfall;
- Contributes to the 45% overall renewable energy target by 2030 for the EU introduced by the RePowerEU plan in light of the war in Ukraine;
- Contributes to assisting Ireland to increase from 42% electricity produced by renewable sources in 2020 to 80% by 2030 to meet the national target;
- Complies with the Regional Spatial and Economic Strategy for the southern region's goal of prioritizing action on climate change across all strategic areas and in all economic sectors;
- Supports the local Cork County Development Plan policy of increasing energy security and promoting renewable energy and contributes approximately 10% of the gap between the installed (and permitted) capacity of wind in County Cork and the prorated national target of 1,100MW as per the CCDP.
- Aligns with Cork and Kerry County Development Plans' requirements with respect to water quality, landscape, biodiversity or amenities, and
- Contributes to rural economic development in line with the Cork CDP.

The development process adopted by the Applicant has represented a best practice approach to a renewable energy scheme design, minimising the potential impact on the receiving environment through multiple design iterations. The proposed layout represents the optimum fit with the technical and environmental parameters of this project and this site. Furthermore, the embedded mitigation, mitigation by avoidance and reduction and compensation through management and restoration of degraded habitats as outlined in the EIAR, CEMP and Habitat Management Plan are considered to adequately mitigate the predicted environmental effects.

Overall, it is considered that the Development aligns with international, European, national and local policy.