

ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIAR) FOR THE PROPOSED COOM GREEN ENERGY PARK, COUNTY CORK

VOLUME 2 – MAIN EIAR – CHAPTER 4 - POLICY

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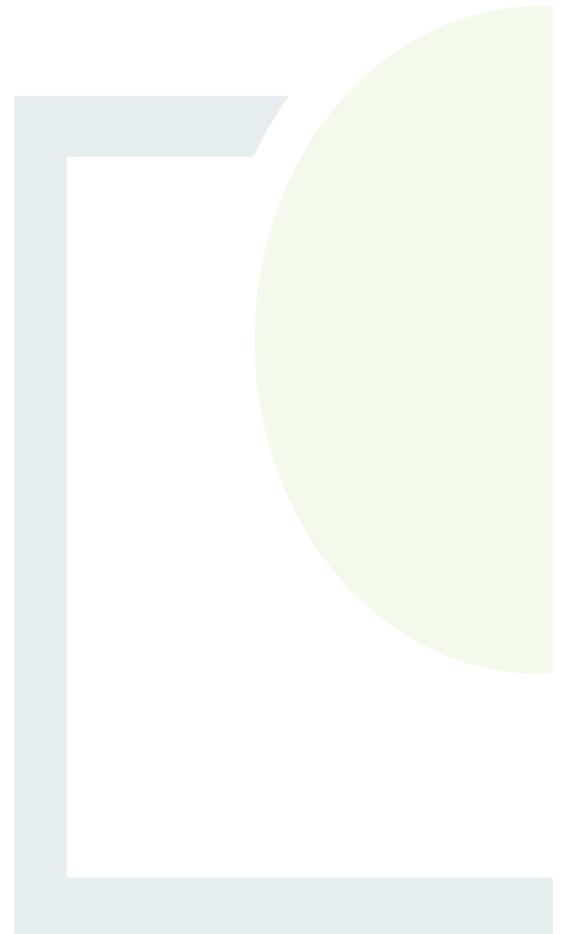


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4. POLICY

4.1 Introduction

This Chapter of the EIAR outlines current EU, national, regional and where relevant local policy and legislation relating to the proposed Coom Green Energy Park (CGEP) Development.

The Irish Planning Policy system is set within a hierarchical structure, as identified in Figure 4.1. National policy is informed by EU Directives, Planning Legislation, Ministerial Guidelines, Government Policy and Capital programmes.

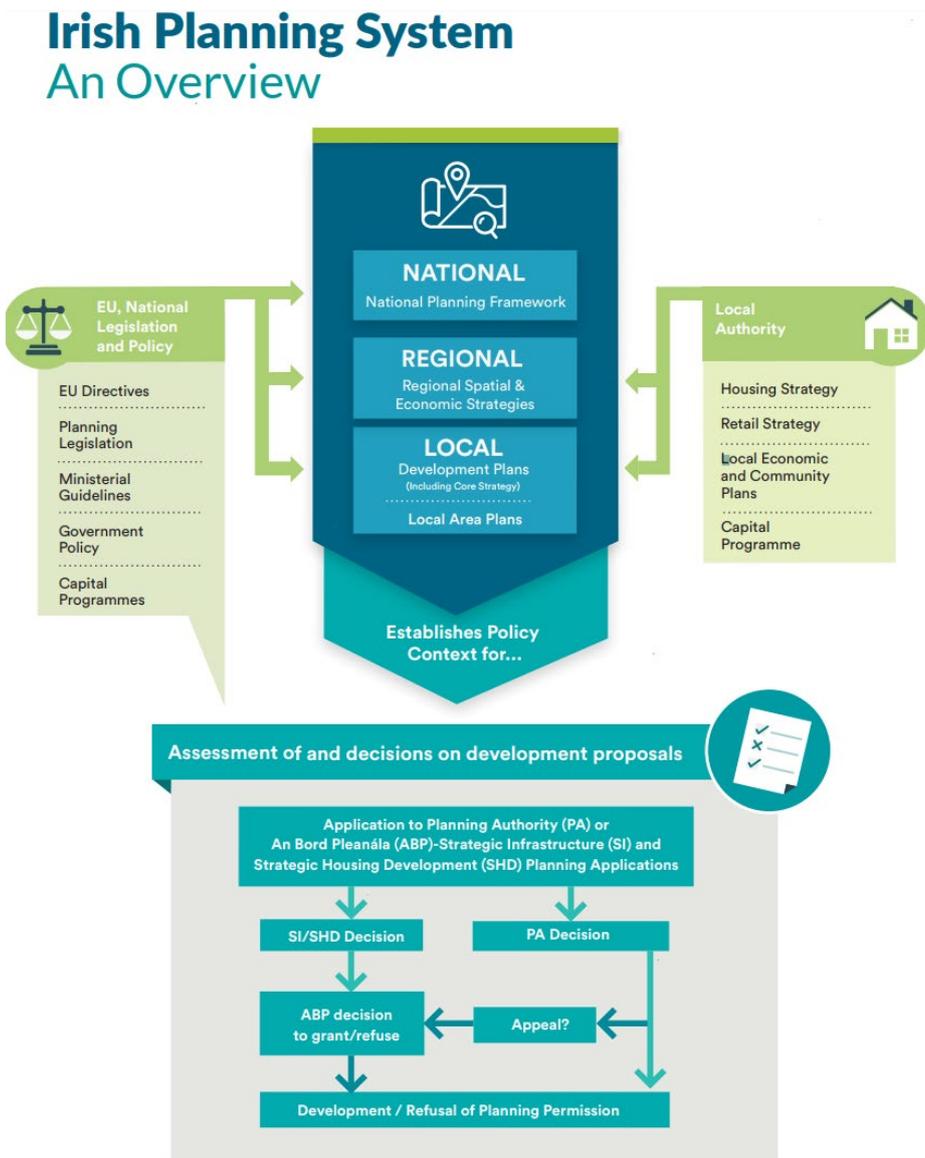


Figure 4-1: Irish Planning System – An Overview Extract from the National Planning Framework – Ireland 2040



International and European legally binding agreements to reduce the reliance on fossil fuels and to manage climate change internationally have been adopted into Ireland's National Energy Policy. This section of the report outlines how these legally binding agreements are being facilitated through national energy policy with a clear mandate to support onshore wind energy development within the state. The importance in complying with the national energy policy at a local level cannot be overstated if Ireland is to achieve its national energy targets. The latest SEAI figures available detail renewable energy production in 2018 and state that Ireland is not on track to meet its 2020 renewable energy targets with overall renewable energy at 11%, 5% below the 16% target.

Renewable electricity production in 2018 was 33.2%. This is 6.8% below the 40% national target (SEAI, 2020). This figure has increased by 3.1% from 2017 figures, indicating that if this positive trend continues, the end of year 2020 target for 40% renewable electricity may be achievable as indicated by the Irish Wind Energy Association in an August 2020 news publication (IWEA, 2020). However, the 2030 target of 70% renewable electricity is now the focus going forward. The following Chapter sets out how the CGEP complies with national and local energy policy and will contribute towards Ireland's national renewable energy targets for 2030.

4.2 International Global Policies

4.2.1 United Nations Framework Convention on Climate change

The United Nations Framework Convention on Climate Change (UNFCCC) is an international environmental treaty negotiated at the United Nations Conference on Environment and Development (UNCED), in Rio de Janeiro in 1992. Its ultimate objective was to achieve "... *stabilisation of greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system* (United Nations, 2013)" There are 195 parties ratified to the Convention and these are subdivided into Annex I, Annex II, Annex B, Non-Annex I and Least Developed Countries.

The Framework Convention specifies the aim of developed (Annex I) parties stabilising their greenhouse gas emissions (carbon dioxide and other anthropogenic greenhouse gases not regulated under the Montreal Protocol) at 1990 levels, by the year 2000. The treaty did not set any limits or binding targets, instead, it provided a framework for negotiating specific international treaties ("protocols") that set binding limits on greenhouse gases. It does, however, require all parties in Annex 1 [Decision 3 CP.5] (of which the European Union 15 (EU-15) forms part of) to prepare and publish National Inventory Reports (NIRs) on emissions. The Environmental Protection Agency (EPA) is responsible for the preparation of Ireland's NIR.

The Conference of the Parties (COP) is the highest body of the UNFCCC and consists of environment ministers who have met annually since 1995 to assess progress in dealing with the issue of climate change. At the Paris climate conference (COP21) in December 2015, 195 countries adopted the first-ever universal, legally binding global climate deal. The agreement sets out a global action plan to put the world on track to avoid dangerous climate change by limiting global warming to well below 2°C above pre-industrial levels and to limit the increase to 1.5°C. Under the agreement, Governments also agreed on the need for global emissions to peak as soon as possible, recognising that this will take longer for developing countries and to undertake rapid reductions thereafter in accordance with the best available science.

The International Panel on Climate Change (IPCC) has put forward its clear assessment that the window for action on climate change is rapidly closing and that renewable energy sources such as wind will have to grow from 30% of global electricity at present to 80% by 2050 if we are to limit global warming to well below 2°C above pre-industrial levels in accordance with the COP 21 agreement. Former Minister Kelly remarked in 2015 that "As a nation we must do everything in our power to curb our emissions".



In this regard the Government enacted the Climate Action and Low Carbon Development Act 2015 which provides for the approval of plans by the Government in relation to climate change for the purpose of pursuing the transition to a low carbon, climate resilient and environmentally sustainable economy.

4.2.2 Kyoto Protocol

In 1997, at one of the COPs, the Kyoto Protocol which set legally binding obligations for developed countries to reduce their greenhouse gas (GHG) emissions in two commitment periods was established.

The first commitment period (2008 - 2012) applied to emissions of six main greenhouse gases (carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) and sulphur hexafluoride (SF₆)), and set targets for:

- A 5% overall reduction in the emission of greenhouse gases in developed countries.
- An average 8% reduction below 1990 levels within the EU.

The EU-15 and other European countries (some of which subsequently acceded to the EU) have individual GHG reduction and limitation targets under the Kyoto Protocol.

Together, these European countries committed to achieve an annual emission reduction of 456 Mt CO₂-equivalent (CO₂eq) below 1990 levels over the period 2008 to 2012 (European Environmental Agency 2010).

Ireland's contribution is a limit of 13% above 1990 greenhouse gas emission levels which corresponds to an average limit of 62.8 million tonnes (Mt) of carbon dioxide equivalent (CO₂eq) per annum during the period 2008 – 2012. Countries not fulfilling their obligations will be forced to purchase carbon credits on an open market from compliant countries.

The second commitment period applies to emissions from 2013 - 2020. All members of the European Union have binding targets in the second commitment period.

The EU-27 countries have committed to reduce their GHG emissions by at least 20% by 2020 compared to 1990 levels and to increase this commitment to a 30% reduction if other major emitting countries agree to similar targets under a global climate agreement.

Developing countries do not have binding targets under the Kyoto Protocol, but are still committed under the treaty to reduce their emissions. Actions taken by developed and developing countries to reduce emissions include support for renewable energy, improving energy efficiency, and reducing deforestation.

One of the key mechanisms introduced under the Kyoto Protocol is the international emissions trading scheme which allows developed countries to trade their commitments. They can trade emissions quotas among themselves and can also receive credit for financing emissions reductions in developing countries.

The EU Emission Trading Scheme (ETS) came into operation on 1 January 2005 and was introduced to facilitate Member States achieve their commitments to limit or reduce greenhouse gas emissions in a cost-effective way. It is the largest such scheme in the world and allows participants to buy or sell emission allowances which means that emission cuts can be achieved at least at cost. The EU ETS is a 'cap and trade' scheme, in that it caps the overall level of emissions allowed but, within that limit, allows participants in the scheme to buy and sell allowances as they require.



These allowances are the common trading 'currency' at the heart of the scheme. One allowance gives the holder the right to emit one tonne of CO₂ or the equivalent amount of another greenhouse gas (CO₂eq).

The categories of activity covered by the EU ETS are set out in Annex 1 of the principal Directive (2003/87/EC) and the greenhouse gases to which the Scheme applies to are set out in Annex II of the same Directive. While all six gases listed in Annex A of the Kyoto Protocol are included in Annex II, not all are in practical terms actually covered by the ETS and the listing of all in Annex II is perhaps a signal of the intention to extend the scheme in the future.

The Scheme operates in periodic cycles that have come to be known as 'phases' as the EU ETS scheme is open ended with no termination date specified. Phase 1 ran from 2005 - 2007 and was known as the commitment period, Phase 2 covered 2008 -2012 (the Kyoto Phase) and Phase 3 extends from 2013 – 2020 and this phase ties in with the EU Commissions end date of 31 December 2020 for its own reduction in greenhouse gases.

Further changes proposed for the ETS commenced in 2013 through Directive 2009/29/EC. In summary Member states, will no longer draw up National Allocation Plans (NAPs) – instead there will be a single EU-wide cap and allowances will be allocated on the basis of harmonised rules amongst other changes to the trading period etc.

Phase 4 will run from 2021-2030 and aims to improve the ETS as part of a revision to the ETS Directive concluded in 2018, to achieve the EU's 2030 emission reduction targets in line with the 2030 climate and energy policy framework and as part of the EU's contribution to the 2015 Paris Agreement (EU, 2019). The legislation governing the auctions of emission allowances required to be changed to take into account new rules agreed as part of the 2018 revision of the ETS Directive. The changes concern in particular the use of the common auction platform to monetise the allowances dedicated to the Innovation and Modernisation Fund. This phase will include a reduced emissions allowance at an annual rate of 2.2%, up from 1.74%, increasing each nation's need to cut emissions on an annual basis.

4.3 EU Directives and Policies

4.3.1 Directive on the Promotion of the use of Energy from Renewable Resources

The EU Directive on the Promotion of the Use of Energy from Renewable Sources (2009/28/EC) sets a target of 20% of EU energy consumption from renewable sources by 2020 and a 20% cut in greenhouse gas emissions by 2020, the so-called 20:20:20 plan.

The Directive recognises the need to promote renewable energy sources and technologies which will have a positive impact on:

- Security of energy supply
- Regional and local development opportunities
- Rural development
- Export prospects
- Social cohesion
- Employment opportunities.



As part of this Directive, Ireland’s overall national target for the share of energy from renewable sources in gross final consumption of energy in 2020 is 16% (increased from 3.1% in 2005). The sectoral components of the overall 16% target are detailed in Table 4.1, which outlines each form of renewable energy supply (RES). The current share of renewable energy in these components is also presented.

Table 4-1: Target and Current Share of Renewable Energy in Energy Sectors

Form of Renewable Energy Supply	Target Share (2020)	2015 Position (SEAI, 2016)	2018 Position (SEAI, 2020)
Electricity (RES-E)	40%	25.3%	33.2%
Heat (RES-H)	12%	6.5 %	6.5%
Transport (RES-T)	10%	5.7%	7.2%

4.3.2 European 2020 Strategy for Growth

Europe 2020 is the EU’s ten-year growth strategy which identifies five headline targets:

1. **Employment** - 75% of the population aged 20 - 64 to be employed
2. **Research and Development** - 3% of the EU's GDP to be invested in research and development
3. **Climate Change and Energy Sustainability**
 - A reduction in greenhouse gas emissions of 20% (or even 30%, if conditions are right)
 - 20% of energy from renewables
 - 20% increase in energy efficiency
4. **Education** - Reducing the rate of early school leavers to below 10% and at least 40% of 30 - 34-year olds completing third level educations
5. **Fighting poverty and social exclusion** - at least **20 million fewer people in or at risk of poverty and social exclusion.**

In 2018, the renewable energy share (RES) in the final energy consumption of the EU was 18% compared to 13% in 2011. With binding national targets, growth in renewable energy has increased but significant improvements are still required to meet the overall 2020 target of 20% renewable energy across the EU (European Commission, 2020). Although the EU is close to meeting the 2020 target, 2030 targets have now been set out as detailed in section 4.3.4, and will be the focus going forward.

In a Renewable Energy Progress Report published by the European Commission (2019) the Commission notes “The EU is on track for reaching its renewable energy target for 2020.”. However, seven Member States – of which Ireland is one, Luxembourg, the Netherlands, Belgium, France, Poland and Slovenia are currently projected not to meet their national binding targets in line with their average 2017-2018 indicative trajectory towards 2020 targets.



Ireland's mandatory national target is to supply 16% of its overall energy needs from renewable sources by 2020. This target covers energy in the form of electricity (RES-E), heat (RES-H) and transport fuels (RES-T). For RES-E alone, Ireland has set a national target of 40% by 2020 as outlined in the National Renewable Energy Action Plan (NREAP). Government policies identify the development of renewable energy, including wind energy, as a primary strategy in implementing national energy policy.

4.3.3 Europe 2020 Indicators – Climate Change and Energy

The 'Europe 2020 Strategy' is the EU's agenda for growth and jobs for the current decade. The Europe 2020 Strategy targets on climate change and energy include:

- Reducing GHG emissions by at least 20% compared with 1990 levels;
- Increasing the share of renewable energy in final energy consumption to 20%; and
- Moving towards a 20% increase in energy efficiency.

These targets are also known as the '20-20-20' targets.

The EU Climate Action Progress Report (2019) provides a summary of the main statistical findings regarding the path to achieving the EU's emissions reduction target for 2020 and 2030.

In 2018, the EU as a whole had cut man-made GHG emissions by 23% compared with their 1990 levels.

In 2017, ten EU nations exceeded their annual emissions allowance including Ireland. In 2018 Ireland exceeded its annual emissions allowance by 12%, the second highest in the EU behind Malta at 27%. The 2019 report indicates that Ireland, Germany, Malta and Austria are likely to incur a net deficit of annual emissions allowances over the 2013-2020 period and are likely to incur penalties.

In relation to 2020, projected GHG emissions based on Member States' existing policy measures shows the EU is on track to surpass its 2020 target, however, it will fall below the 2030 target of reduced GHG emissions by 40% if further measures and interventions are not taken.

4.3.4 2030 Climate and Energy Framework

In October 2014 EU leaders adopted the 2030 Climate and Energy Framework (European Commission, 2014) which was subsequently updated in 2018. The framework provides a long term perspective beyond 2020 targets. The 2030 Climate and Energy Framework sets out three key targets for the year 2030:

- At least 40% cuts in greenhouse gas emissions (from 1990 levels)
- At least 32% share of renewable energy
- At least 32.5% improvement in energy efficiency.

Further to this the European Commission in 2016 published its 2030 emissions targets break down for each Member State. While the overall EU target is a reduction of 40% on 1990 greenhouse gas emissions by 2030, every Member State negotiates an individual target. Ireland will have to reduce its emissions by 30% relative to its 2005 emissions.



Ireland will have 4% one-off flexibility from emissions trading, at the highest end of the ranking. Ireland will have 5.6% flexibility from land use. This is a substantially larger margin than any other Member State except Latvia.

4.3.5 A roadmap for Moving to a Competitive Low Carbon Economy in 2050

Looking beyond 2020 in compliance with the EC Energy Roadmap 2050, an EU target of at least 27% has been indicated as the share of renewable energy consumed in the EU in 2030. While the Department of Communications, Climate Action and Environment (DCCA) is currently examining the potential for diversifying Ireland's renewable technology mix in the post-2020 period, the Department recognises that; *"as a proven and cost effective technology, onshore wind will remain part of Ireland's generation portfolio out to 2030 and will help to meet Ireland's contribution to the binding EU-wide 2030 renewable energy target"*. The Roadmap has informed national policy and has influenced the Climate Action Plan (2019) which sets out actions to reduce climate change towards 2050.

4.3.6 Recast Renewable Energy Directive (RED2)

In June 2018, an agreement was made in Europe between negotiators for the Commission, the European Parliament and the Council with regard to increasing renewable energy use in Europe. The new regulatory framework includes a binding renewable energy target for the EU for 2030 of 32% with an upwards revision clause by 2023. This agreement will help the EU meet the Paris Agreement goals. In terms of renewable energy production, the agreement has achieved:

- A new, binding EU renewable energy target of 32% by 2030, including a review clause by 2023 for an upward revision of the EU level target;
- Improved design and stability of renewable energy support schemes.

The revised renewable energy Directive 2018/2001/EU entered into force in December 2018.

4.3.7 European Green Deal (2019)

The European Green Deal is a growth strategy for the EU which aims to transform the EU into a fair and prosperous society, improving quality of life with modern, resource-efficient and competitive economy where there are no net emissions of greenhouse gases in 2050 and where economic growth is decoupled from resource use. The EU aim to do this by becoming climate-neutral by 2050.

With regard to the supply of clean, affordable and secure energy, the European Green Deal underlines the fact that in order to meet the EU's climate and sustainability goals, all sectors must increase their use of renewable energy and phase out fossil fuels.

The EU aim to increase the greenhouse gas emission reductions targets for 2030 to 55%, compared to 1990 levels, in order to achieve net-zero greenhouse gas emissions by 2050. A key principle for achieving this will be to develop a power sector based largely on renewable resources. At a national level, the Programme for Government (2020) has set out a commitment to an average 7% per annum reduction in overall greenhouse gas emissions from 2021 to 2030 (a 51% reduction over the decade) in line with the EU Commission's commitment to increase the EU-wide greenhouse gas emissions reduction target. This is further detailed in section 4.4.6.



4.4 National Policies

4.4.1 Climate Action and Low Carbon Development Act 2015

The Climate Action and Low Carbon Development Act was published in January 2016 by the then Minister for Environment, Heritage and Local Government. The Act sets out the national objective of transitioning to a low carbon, climate resilient and environmentally sustainable economy in the period up to and including the year 2050. The Act provides for a solid statutory foundation to the institutional arrangements necessary to enable the State to pursue and achieve the “national transition objective”.

While there are no explicit targets set out within the Act itself, the legislation obliges the State to take into account any existing obligations of the State under the law of the European Union or any international agreement. In effect, the Act formally obliges the State to adhere to EU targets such as 20 % reduction in emissions by 2020 over 1995 levels. The other major feature of the Act is the establishment of an expert advisory council of between nine and 11 members which will advise and make recommendations to the Minister for the Environment.

4.4.2 Project Ireland 2040: The National Planning Framework

As a strategic development framework, Project Ireland 2040: The National Planning Framework, demonstrates an approach that joins up ambition for improvement across the different areas of our lives, bringing the various government departments, agencies, State owned enterprises and local authorities together behind a shared set of strategic objectives for rural, regional and urban development.

“The National Planning Framework is a planning framework to guide development and investment over the coming years.

It does not provide every detail for every part of the country; rather it empowers each region to lead in the planning and development of their communities, containing a set of national objectives and key principles from which more detailed and refined plans will follow.”

The Framework sets out the key goals and objectives for the State, and central to this framework is the theme of *Realising Our Sustainable Future*. In particular, the Framework notes in Section 9.2: Resource Efficiency and Transition to a Low Carbon Economy that:

“Our transition to a low carbon energy future requires:

- *A shift from predominantly fossil fuels to predominantly renewable energy sources;*
- *Increasing efficiency and upgrades to appliances, buildings and systems;*
- *Decisions around development and deployment of new technologies relating to areas such as wind, smartgrids, electric vehicles, buildings, ocean energy and bio energy; and*
- *Legal and regulatory frameworks to meet demands and challenges in transitioning to a low carbon economy.”*

The NPF is supported by a series of National Strategic Outcomes which the Framework seeks to deliver.



The purpose of the National Strategic Outcomes (NSOs) is to create a single vision, through a shared set of goals for every community across the country. The most pertinent outcomes in the context of the proposed renewable energy development are as follows:

National Strategic Outcome 3: Strengthened Rural Economies and Communities,

National Strategic Outcome 6: A Strong Economy Supported by Enterprise, Innovation and Skills,

National Strategic Outcome 8: Transition to Sustainable Energy.

A series of National Policy Objectives (NPOs) were developed to set the context for regional and local planning policy in Ireland. In the context of the proposed development, the following NPOs are considered the most relevant:

Table 4-2: National Policy Objectives (NPOs) from Project Ireland 2040: The National Planning Framework

Policy Objective	Description
National Policy Objective 15	Support the sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural communities.
National Policy Objective 21	Enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through the diversification of the rural economy into new sectors and services, including ICT based industries and those addressing climate change and sustainability.
National Policy Objective 23	Facilitate the development of the rural economy through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture, energy and extractive industries, the bio-economy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism.
National Policy Objective 52	The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the requirements of all relevant environmental legislation and the sustainable management of our natural capital.
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 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.



Section 1.2: Making the Vision a Reality, recognises the need for new energy systems and transmission grids in order to deliver a more distributed, renewable focused national energy system in order to harness the potential from wind, wave and solar energy sources.

“The National Climate Policy Position establishes the national objective of achieving transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050. This objective will shape investment choices over the coming decades in line with the National Mitigation Plan and the National Adaptation Framework. New energy systems and transmission grids will be necessary for a more distributed, renewables-focused energy generation system, harnessing both the considerable on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy to the major sources of demand.”

With regard to planning and investment for rural locations, Section 5.4: Planning and Investment to Support Rural Job Creation, recognises the key role of energy production in assisting in the rejuvenation of rural towns and villages to create and sustain vibrant rural communities.

“Rural areas have significantly contributed to the energy needs of the country and will continue to do so, having a strong role to play in securing a sustainable renewable energy supply. In planning Ireland’s future energy landscape and in transitioning to a low carbon economy, the ability to diversify and adapt to new energy technologies is essential. Innovative and novel renewable energy solutions have been delivered in rural areas over the last number of years, particularly from solar, wind and biomass energy sources.”

4.4.3 Project Ireland 2040: National Development Plan 2018 - 2027

The National Development Plan 2018-2027 (NDP) published in February 2018, in tandem with the National Planning Framework (NPF), seeks to drive Ireland’s long term economic, environmental and social progress over the next decade, in accordance with the spatial planning context of the NPF.

The key role of the NDP is to set out the updated configuration for public capital investment over the next 10 years in order to achieve the National Strategic Outcomes as set out within the NPF.

The NDP outlines a number of key energy initiatives, that set out to diversify our energy resources, and to assist in the transition towards a decarbonised society.

The NDP further emphasises National Strategic Outcome 8: Transition to Sustainable Energy, noting that:

“Ireland’s energy system requires a radical transformation in order to achieve its 2030 and 2050 energy and climate objectives. This means that how we generate energy and how we use it, has to fundamentally change. This change is already underway with the increasing share of renewables in our energy mix and the progress we are making on energy efficiency.

Investment in renewable energy sources, ongoing capacity renewal, and future technology affords Ireland the opportunity to comprehensively decarbonise our energy generation. By 2030, peat and coal will no longer have a role in electricity generation in Ireland. The use of peat will be progressively eliminated by 2030 by converting peat power plants to more sustainable low-carbon technologies.”

In achieving a Low-Carbon, Climate Resilient Society, the NDP outlines a New Renewable Electricity Support Scheme to support up to 4,500 megawatts of additional renewable electricity by 2030.



It is considered that such schemes, in conjunction with greater investment in renewable energy, diversity of supply, and increased utilisation and adoption of electricity storage, will significantly assist in promoting a low-carbon, less energy intensive supply.

4.4.4 Climate Action Plan (2019)

The Government published a Climate Action Plan (CAP) in June 2019. The CAP resulted from the Irish Government declaring a climate and biodiversity emergency on 9th May 2019. The CAP identifies how Ireland will achieve its 2030 targets for carbon emissions throughout various sectors with a number of actions. A selection of these relevant to the Coom Green Energy Park are listed below.

The CAP sets out an objective to more than double Ireland's onshore wind energy capacity to 8.2GW by 2030 in order to meet new renewable energy targets and reduce emissions.

The CAP states that:

"The analysis presented in this Plan shows that it is not only technically feasible to meet our 2030 EU target, but that it is also economically achievable. The majority of the required abatement to 2030 could be achieved by deploying measures that are, over their life-time, either cost-neutral or result in net savings to society."

Key actions identified for electricity include:

- Increase reliance on renewables from **30% to 70%** adding 12GW of renewable energy capacity (with peat and coal plants closing).
- Put in place a coherent support scheme for micro-generation with a price for selling power to the grid.
- Open up opportunity for community participation in renewable generation as well as community gain arrangements.
- Streamline the consent system, the connection arrangements, and the funding supports for the new technologies on and offshore.

The following actions are of importance

- Action 2: Establishment of Climate Action Delivery Board.
- Action 4: Publish the Climate Action (Amendment) Bill 2019.
- Action 15: Implement National Planning Framework.
- Action 17: Ensure that ESB Networks and EirGrid plan network and deliver on connecting renewable energy sources to meet the 2030 70% RES-E target.
- Action 18: Facilitate additional hybrid connections (e.g. solar/wind/batteries) operating in the electricity market to increase RES-E penetration.
- Action 19: Ensure that the next phase of renewable connection policy is fit for purpose to deliver on renewable energy targets and community projects, and report annually on the timeliness of grid connection.



- Action 21: Ensure that updated planning guidelines for onshore wind are published in 2019.
- Action 24: Facilitate very high penetration of variable renewable electricity by 2030 (both SNSP and average) through system services and market arrangements.
- Action 28: Design and implement the Renewable Energy Support Scheme (RESS). Increase the volumes and frequencies of RESS auctions to deliver on the 70% renewable electricity target by 2030 ensuring an appropriate community/enterprise mix to achieve an efficient delivery of renewables.
- Action 29: Ensure that 15% of electricity demand is met by renewable sources contracted under Corporate PPA's.

4.4.5 Ireland's Greenhouse Gas Emission Projections 2018 - 2040

The National Climate Change Strategy designated the Environmental Protection Agency (EPA) with responsibility for developing annual national emission projections for greenhouse gases for all key sectors of the economy, including transport.

The EPA publishes greenhouse gas emission projections on an annual basis and submits emission projections to the Commission as required under Monitoring Mechanism Regulation 525/2013.

The EPA's publication entitled *Ireland's Greenhouse Gas Emission Projections (2019)* provides an updated assessment of Ireland's projected greenhouse gas emissions out to 2040 which includes an assessment of progress towards achieving its emission reduction targets to 2020 and 2030 set down under the EU Effort Sharing Decision (Decision No 406/2009/EC). Ireland's 2020 target is to achieve a 20% reduction of non-Emission Trading Scheme (non-ETS) sector emissions (i.e. agriculture, transport, the built environment, waste and non-energy intensive industry) on 2005 levels with annual binding limits set for each year beyond 2020. New 2030 targets for EU Member States were adopted by the European Council in 2018. Ireland's 2030 target under the Effort Sharing Regulation is a 30% reduction of emissions compared to 2005 levels by 2030. There will be binding annual limits over the 2021-2030 period to meet that target.

During its operation, the estimated 300GWh of electricity produced by the proposed CGEP would be sufficient to supply approximately 70,000 Irish households with electricity per year, based on the average Irish household using 4.200 MWh of electricity (this latest figure is available from the March 2017 CER Review of Typical Consumption Figures Decision). Thus, this energy will be used to offset the same amount of energy that would otherwise be generated from burning of fossil fuels at power stations.

It is estimated that approximately 137,371 tonnes of CO₂ emissions per annum will be offset due to the proposed CGEP. As a result, the operational stage, of the CGEP will have a significant long-term positive impact on air quality and climate change in terms of policy and legislation at a local, regional, national and international level. Further details relating to the positive effects of the proposal on air quality and climate change are included in Chapter 6 of this EIAR.

4.4.6 Climate Action and Low Carbon Development (Amendment) Bill 2020

The Climate Action and Low Carbon Development (Amendment) Bill is a piece of legislation which commits Ireland, in law, to move to a climate resilient and climate neutral economy by 2050. The Programme for Government commits to a 7% average yearly reduction in overall greenhouse gas emissions over the next decade, and to achieving net zero emissions by 2050. This Bill will drive implementation of a suite of policies to help us achieve this goal.



The Bill includes for a system of successive 5-year economy-wide carbon budgets, which will outline a ceiling for total greenhouse gas emissions. A requirement is included to revise the Climate Action Plan on an annual basis and prepare a National Long Term Climate Action Strategy at least every decade. The Bill also requires for all Local Authorities to prepare individual Climate Action Plans which will include both mitigation and adaptation measures, representing a mandate for Local Authorities to adapt to climate change.

4.4.7 National Policy Conclusion

The development of the CGEP is in support of national policy as set out above. The project supports the enhancement of the competitiveness of rural areas and facilitates the development and diversification of the rural economy by supporting the energy sector and increasing the share of renewables in Ireland's energy mix.

The CGEP will help achieve the nation's target increase of renewable energy from 30% to 70% by 2030 and supports the doubling of onshore wind energy in Ireland by 2030 as set out in the Climate Action Plan.

The project supports national targets of climate change mitigation and reduction in greenhouse gas emissions. The project promotes the use of renewable energy generation and use at appropriate locations and supports the achievement of a low carbon economy by 2050. It is therefore considered that the CGEP is in line with national policy and supports the achievement of national energy and sustainability targets.

4.5 Regional Policies

4.5.1 Southern Regional Spatial & Economic Strategy

The Southern Regional Spatial & Economic Strategy (RSES) came into effect on 31st January 2020. The RSES sets out a strategy to implement the NPF at a regional level for the Southern Region. This strategy replaces the previous Regional Planning Guidelines which focused on the superseded National Spatial Strategy. The RSES also combines the South East, South West and Mid-West regions to create one cohesive region, as illustrated in Figure 4-2.

The RSES sets out a strategic vision which includes actions to mitigate against climate change. The RSES recognises the urgency to transition to a low carbon future, accelerate the transition towards a low carbon economy and increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport and agriculture in order to safeguard and enhance the region's environment through sustainable development, prioritising action on climate change across the region and driving the transition to a low carbon and climate resilient society. The RSES states the following in relation to wind energy:

“Wind energy is currently the largest contributor of renewable energy and it has the potential to achieve between 11-16GW of onshore wind and 30GW of offshore wind by 2050 (SEAI, 2016). The sector can make a significant contribution to meeting national energy demands while attaining our energy and emissions targets for 2020 and beyond.”

The RSES includes a range of policy objectives which support the development of renewable energy projects such as the CGEP Project.



Objectives include the following:

Table 4-3: Regional Spatial and Economic Strategy Objectives

Policy	Description
RPO 50	It is an objective to further develop a diverse base of smart economic specialisms across the rural Region, including innovation and diversification in (among other things) renewable energy as a dynamic driver for the rural economy.
RPO 56	The RSES recognises the urgency to transition to a low carbon future and it is therefore an objective to accelerate the transition towards low carbon economy and circular economy through mechanisms such as the Climate Action Competitive Fund;
RPO 95	It is an objective to support implementation of the National Renewable Energy Action Plan (NREAP), and the Offshore Renewable Energy Plan and the implementation of mitigation measures outlined in their respective SEA and AA and leverage the Region as a leader and innovator in sustainable renewable energy generation.
RPO 99	It is an objective to support the sustainable development of renewable wind energy (on shore and offshore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.

The development of the CGEP will aid in meeting the objectives set out in the RSES including diversification of the rural economy, actions against climate change and the sustainable development of wind energy at an appropriate location.

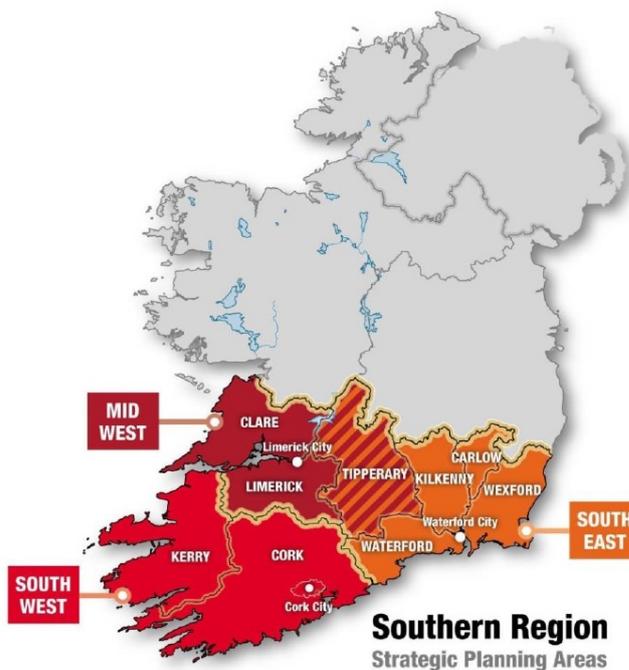


Figure 4-2: The Regional Assemblies and the Southern Region



4.6 Local Policy

4.6.1 Cork County Development Plan 2014

It is a specific planning policy requirement under Section 28 of the Planning & Development Act 2000 (as amended) that in making development plans a planning authority has regard to national policy on renewable energy as contained in the aforementioned policy documents. A County Development Plan is required to indicate how the implementation of the development plan will contribute to realising overall national targets on renewable energy and climate change mitigation. This applies in particular to wind energy production and the potential wind energy resource.

The Cork County Development Plan (CDP) 2014 sets out the strategic framework for land use planning in the county. Chapter 9 of the CDP sets out the energy strategy for the County with an aim to:

“Ensure that through sustainable development County Cork fulfils its optimum role in contributing to the diversity and security of energy supply and to harness the potential of the county to assist in meeting renewable energy targets.” (ED 1-1 Energy)

The most pertinent transposed policies and objectives are outlined in Table 4-4:

Table 4-4: Extracts from County Council Development Plan 2014

Policy / Objective	Description
Objective ED 3-1	National Wind Energy Guidelines - Development of on-shore wind shall be designed and developed in line with the ‘Planning Guidelines for Wind Farm Development 2006’ issued by DoELG and any updates of these guidelines.
Objective ED 3-2	<i>Wind Energy Projects - 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>
Objective ED 3-3	<i>Wind Energy Generation - Support a plan led approach to wind energy development in County Cork and identify 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>

The on-shore wind energy strategy designations of the Cork County Development Plan as set out in figure 9.3 of the CDP places the site within two separate areas identified as ‘**Open to Consideration**’ and ‘**Urban Area**’. The site in relation to these areas is illustrated in figure 4.3. The area identified as ‘Landfill Area’ in figure 4.3 is referred to as ‘Urban Area’ in the wind energy strategy of the Cork County Development Plan. This area is further illustrated in Plate 4.1.



ED 3-5: Open to Consideration - 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.
- Architectural and archaeological heritage;
- Visual quality of the landscape and the degree to which impacts are highly visible over wider areas.

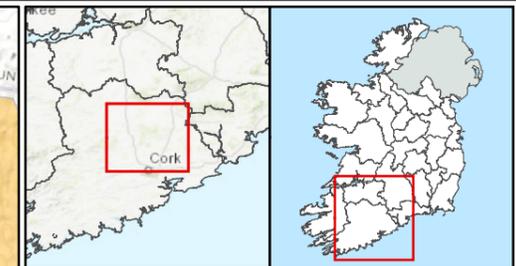
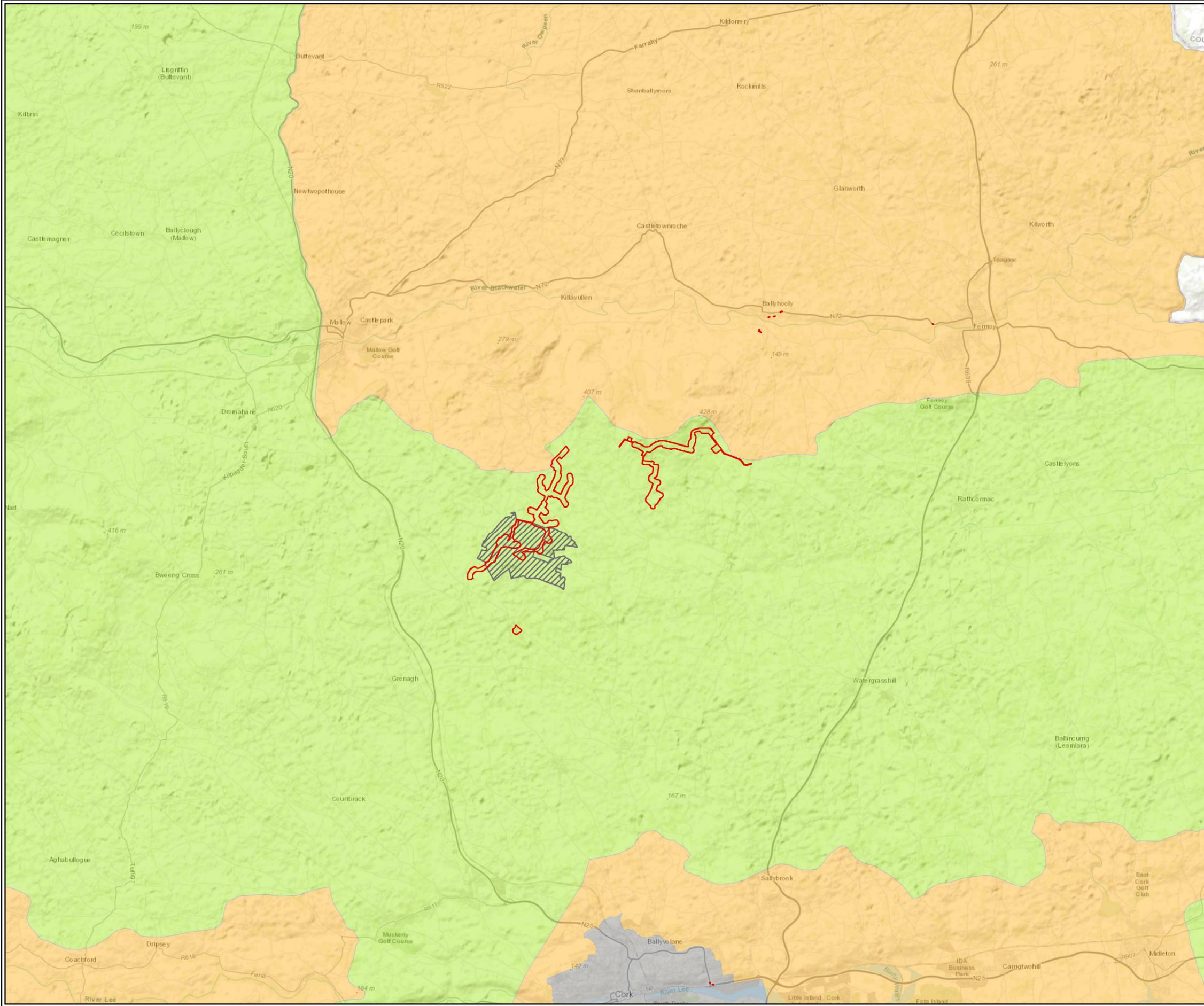
Although the site is contained in an area that is 'Open to Consideration', immediately to the north of the Nagles ridgeline within the Blackwater Valley context, wind energy is 'Normally Discouraged'.

Urban Area – 'Urban Area' is not defined within the Cork County Council Wind Energy Strategy. This designation is associated with towns and villages throughout the County, however, figure 9.2 of the CDP indicates a 'Settlements' area in the location of the Bottlehill Landfill Facility. Within this 'Settlements' area there are no occupied dwellings. The lands consist of forestry, access tracks and the Bottlehill Landfill Facility. The area is identified in figure 4.3 as 'Landfill Area' and is illustrated in Plate 4.1 which shows the 'Urban Area' highlighted in blue along with the proposed development boundary highlighted in red. It is evident from the aerial photograph that The Bottlehill Landfill facility accommodates very little of the area highlighted in the CDP.

The location and design of the CGEP has been considered with respect to the objectives and policies set out in the Cork CDP and as such, is considered to be fully compliant with the CDP policies set out above.



Plate 4-1: Bottlehill Landfill Area



Proposed Development Boundary

Landfill Area (referred to as Urban Area in Cork County Council Wind Energy Strategy)

Cork Wind Policy 2015

- Open to Consideration
- Normally Discouraged
- Cork City Council

TITLE: Cork County Council Wind Energy Policy Areas	
PROJECT: Coom Green Energy Park, Co. Cork	
FIGURE NO: 4.3	
CLIENT: Coom Green Energy Park Ltd.	
SCALE: 1:150000	REVISION: 0
DATE: 28/09/2020	PAGE SIZE: A3

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4.6.2 Cork County Development Plan, Landscape Character Assessment 2014

The site falls within three landscape character types as set out in the Cork County Development Plan landscape character assessment. These areas are further detailed in the Cork County Draft Landscape Strategy 2007.

Landscape Character Type 5: Fertile Plain with Moorland Ridge

This area occupies a substantial portion of northeast Cork. The landscape value and landscape sensitivity are considered very high. The area is characterised as low-lying landscape consisting of extensive areas of predominantly flat or gently undulating topography contained in its periphery by low ridges including the northern slopes of the Nagle Mountains. The proposed turbines are not located within this designation but border it to the south with the closest turbines located approximately 200m south of the Landscape Character Type at T11 and T22. Due to the height of Nagle Mountains and the layout and design of the CGEP, many of the proposed turbines will not be visible when viewed from this Landscape Character Area. Much of the area directly north of the site will only have intermittent views of elements of between 0 and 5 turbines. Greater numbers of turbines will be visible from discrete areas further north when viewed from a distance. Refer to Chapter 15 of this EIAR for information on the zone of theoretic visibility.

Landscape Character Type 10b: Fissured Fertile Middleground

This landscape area runs broadly from Macroom to the west to the Waterford border to the east. According to Appendix E of the Cork CDP: Landscape Character Assessment, the landscape value is classed as medium and the landscape sensitivity is classed as low. This is considered to be of county importance. The area is characterised by flat fertile farmland and high marginal hilly or rugged lands. It is an elevated landscape fissured by rivers and their valleys. The proposed turbines are not located within this Landscape Character Area; however, varying numbers of turbines will be visible when viewed from this Landscape Character Area including intermittent views of between 18 and 22 of the proposed turbines and views where none of the proposed turbines are visible. Refer to Chapter 15 of this EIAR for information on the zone of theoretic visibility.

Landscape Character Type 13b: Valleyed Marginal Middleground

This landscape area includes and surrounds the village of Glenville reaching north to the southern ridgeline of the Nagle Mountains. This landscape comprises of low rounded hills and broad undulating river valleys. According to Appendix E of the Cork CDP: Landscape Character Assessment, the landscape value and landscape sensitivity are considered to be medium and is considered to be of local importance. All of the proposed turbines of the CGEP are located within this Landscape Character Area.

The Landscape Character Area designations are illustrated in relation to the proposed CGEP in figure 4.4.

Scenic Routes

The Cork CDP policy objective GI 7-2: Scenic Routes states the following:

“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.”

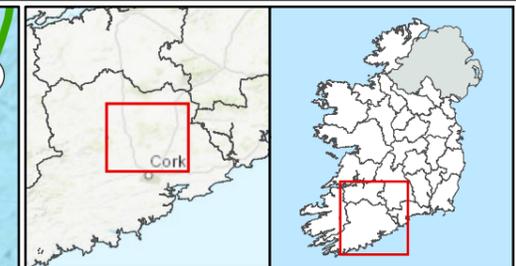
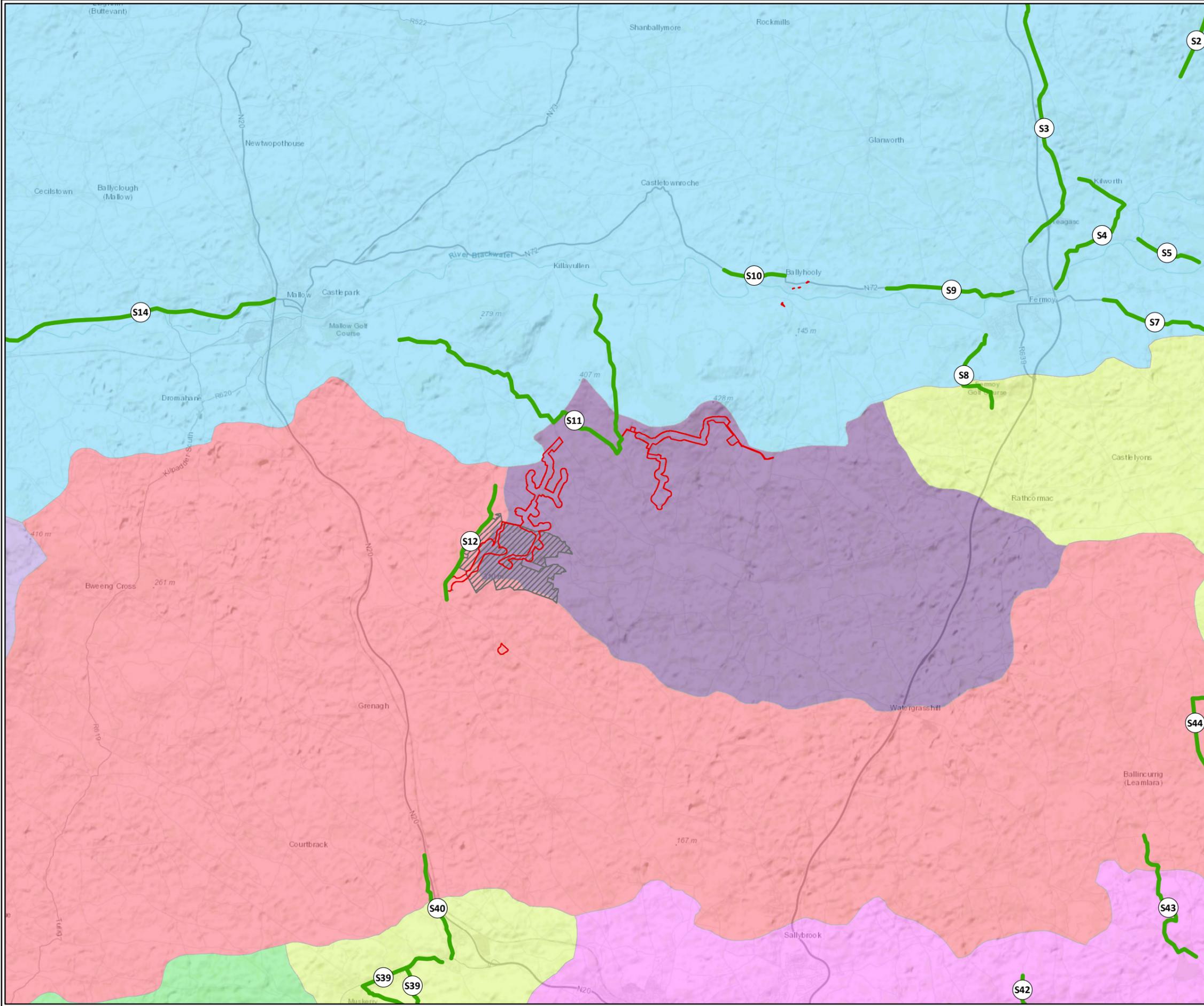
Two scenic routes are in proximity to the proposed development. Route **S11** is a local road at Carrigacunna through the Nagle Mountains to Ross River Valley to Fiddane bridge. The route is designated for the views of the Nagle Mountains. The overall landscape value is considered medium – high. Route **S12** is a local road between Knuttery and Bottlehill. It is designated for views of the rolling landscape. The overall landscape value along this route is considered to be medium.



Three scenic routes are located to the north of the site, routes **S9**, **S10** and **S14**. These routes are located along the N72 and are associated with the Blackwater Valley.

The overall landscape value of these routes is considered to be high. These routes are not likely to be significantly impacted by the proposed development due to the design and layout of the project.

Volume 2, Chapter 5 of the Cork CDP sets out details of each designated scenic route. Details of the relevant routes are included in table 4.5 and illustrated in figure 4.4. An assessment of the potential impact on these scenic routes is described in Chapter 15 - Landscape and Visual.



Scenic Routes

Proposed Development Boundary

Landfill Area (referred to as Urban Area in Cork County Council Wind Energy Strategy)

Landscape Character Types

- Broad Fertile Lowland Valleys
- City Harbour and Estuary
- Fertile Plain with Moorland Ridge
- Fissured Fertile Middleground
- Fissured Marginal and Forested Rolling Upland
- Hilly River and Reservoir Valleys
- Valleyed Marginal Middleground

TITLE:	
Landfill Character Areas and Scenic Routes	
PROJECT:	
Coom Green Energy Park, Co. Cork	
FIGURE NO:	4.4
CLIENT:	Coom Green Energy Park Ltd.
SCALE: 1:130000	REVISION: 0
DATE: 28/09/2020	PAGE SIZE: A3

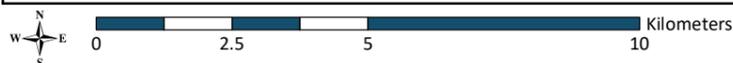




Table 4-5: Scenic Routes (Extract from Cork County Development Plan, Volume 2, Chapter 5)

Scenic Route	Does Route Run Through or Adjoin High Value Landscape	Does the Route adjoin a NHA, pNHA, cSAC a SPA or pSPA	Landscape Type(s) Route Runs Through	Overall Landscape Value	Main Features of Land Cover	Description & General Views Being Protected	Structures of Historic or Cultural Importance Visible from Route	Key Characteristics of Land Use	Is There a Sense of Remoteness as you Travel the Route?	Rural Character
S9	Yes	pNHA and SAC	Type 5 Fertile Plain with Moor land Ridge	High	Agriculture, wooded river valley & mountains. Domain walls & houses.	N72 National Secondary Route between Cregg Castle, Castletyde & Fermoy. Views of the settlement of Fermoy, the Blackwater Valley, the eastern slopes of the Nagle Mountains & demesne walls, characteristic of the area	Castletyde Church of Ireland, Cregg House & Castle, all of which are protected structures, Castletyde Domain & Castletyde Hotel	Agriculture, forestry, stud farms & demesne lands with elements of one-off housing	No	Not Prevalent
S10	Yes	SAC	Type 5 Fertile Plain with Moor land Ridge	High	Settlement, country residences & domain walls, agricultural landscape, Blackwater River Valley, Nagle Mountains & one-off housing	N72, National Secondary Route from Renny Lower through village of Ballyhooly Views of the Blackwater Valley & the northern slopes of the Nagle Mountains	Church of the Nativity of the Blessed Virgin & Convmore Lodge & Farm Buildings all of which are protected structures & substantial houses	Forestry, agriculture & settlement	No	Not prevalent
S11	No	Small section of the western arm adjoins a SAC	Type 5 & southern section falls into Type 13b Valleyed Marginal Middle-ground	High - Medium	Agriculture, forestry, upland moor & bog lands & the slopes of the Nagle & Moyvass Mountains	Local Road at Carrigacunna through Nagle Mountains to Ross River Valley to Fiddane Bridge Views of the Nagle Mountains	No Information Available	Forestry & agriculture	Yes	Prevalent
S12	No	No	Type 10b Fissured Fertile Middle-ground	Medium	Forestry, undulating rural landscape, interspersed grasslands & conifer plantations	Local Road between Knuttery and Bottlenhill Views of rolling landscape	Holy well	Forestry & pastoral grasslands	Yes	Prevalent
S14	No	SAC	Type 5 Fertile Plain with Moor land Ridge	High	Settlement, industrial uses, Mallow Race Course & agriculture	N72 National Secondary Route between Mallow and Roskeen Bridge Views of the Blackwater valley	Period residences & demesne	Industrial, residential & commercial & tillage farming	No	Not prevalent



Relevant landscape policies in relation to the proposed development are listed in Table 4-6 below:

Table 4-6: Landscape Policies / Objectives Pertinent to the Proposed Development

Landscape Policy / Objective	Description
Objective GI 6-1	<ul style="list-style-type: none"> • Protect the visual and scenic amenities of County Cork’s built and natural environment. • Landscape issues will be an important factor in all land use proposals, ensuring that a proactive view of development is undertaken while maintaining respect for the environment and heritage generally in line with the principle of sustainability • Ensure that new development meets high standards of siting and design. • Protect skylines and ridgelines from development. • Discourage proposals necessitating the removal of extensive amounts of trees, hedgerows and historic walls or other distinctive boundary treatments.
Objective GI 6-2	<p>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.</p>
Objective GI 7-1	<p>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.</p>
Objective GI 7-2	<p>Protect the character of those views and prospects obtainable from scenic routes and in particular stretches of scenic routes that <u>have very special views and prospects identified in this plan</u>. The scenic routes identified in this plan are shown on the scenic amenity maps in the CDP Map Browser and are listed in Volume 2 Chapter 5 Scenic Routes of this plan.</p>
Objective GI 7-3	<ul style="list-style-type: none"> • 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. • Encourage appropriate landscaping and screen planting of developments along scenic routes which provides guidance in relation to landscaping.



Having regard to objectives and policies pertaining to landscape, the proposed CGEP is considered to be fully compliant with the CDP. Further details in relation to potential impacts on landscape are included in Chapter 15: Landscape and Visual.

4.6.3 Cork Municipal District Local Area Plans

Cork County Council have prepared a Local Area Plan (LAP) for each of the eight Municipal Districts which cover County Cork. The LAPs set out a land use planning strategy for the development of towns and villages across Cork. The LAPs were adopted in 2017.

The proposed Coom Green Energy Park falls within the boundary of three Municipal District LAPs:

- Cobh
- Fermoy
- Kanturk/Mallow.

As the LAPs focus on development within towns there is very little reference to renewable energy development and few policies regarding rural lands. However, the Cobh Municipal District LAP defines the Bottlehill Landfill site as an 'Other Location'. These are areas which may not form a significant part of the settlement network, but may perform important functions with regard to tourism, heritage, recreation and other uses. General objectives for 'Other Locations' include:

- a) Encourage new development to be designed to ensure that water resources and the natural environment are protected. Protection and enhancement of biodiversity resources within the receiving environment of the village nuclei is also encouraged. Development will only be permitted where it is shown that it is compatible with the protection of sites, designated or proposed to be designated, for the protection of natural heritage.
- b) All proposals for development within the areas identified as being at risk of flooding will need to comply with Objectives WS 6-1 and WS 6-2 as detailed in Chapter 11, Volume 1 of the Cork County Development Plan, 2014, as appropriate, and with the provision of the Ministerial Guidelines - 'The Planning and Flood Risk Management'. In particular, a specific flood risk assessment will be required as described in WS 6-2.

Specific policies for Bottlehill are set out in section 5.3.57(58)(59) of the Cobh Municipal District LAP, including:

This site will manage residual waste from the Cork region in line with the Southern Region Waste Management Plan 2015-2021.

Bottlehill Landfill is an integral part of the waste management infrastructure developed by Cork County Council and Cork City Council. It is envisaged that this facility will contribute positively to the reduction in biodegradable municipal waste being disposed of to landfill.

The proposed CGEP has been designed to avoid potential impact on the future use of the Landfill Facility which has yet to commence operation. Potential cumulative impacts which may occur to the Landfill Facility due to the construction, operation and decommission of the CGEP have been considered and assessed, where relevant, in each respective Chapter of this EIAR. Furthermore, it is considered that the proposed CGEP is fully compliant with local policy as set out in each of the three municipal district Local Area Plans.



4.7 Other Relevant Policies and Guidelines

4.7.1 Department of the Environment, Heritage and Local Government – Wind Energy Development - Planning Guidelines 2006

The Wind Energy Development Planning Guidelines (2006) published by the Department of the Environment, Heritage and Local Government (DoEHLG) offer advice to planning authorities assessing planning applications for wind farm developments. The guidelines set out criteria which assist in the identification of suitable locations for wind energy development. They are also of assistance to developers and the wider public in considering wind energy development.

The proposed development has considered the provisions of the Wind Energy Development Guidelines 2006 in the design and siting of the CGEP. The proposed development is considered to be in line with the recommendations as set out in the Guidelines.

4.7.2 Draft Revised Wind Energy Development Guidelines (December 2019)

The Draft Revised Wind Energy Development Guidelines were published in December 2019 for public consultation. The guidelines will supersede the 2006 guidelines once the document is formally adopted by the government. The revised guidelines aim to applying consistency across all Renewable Energy Strategies with regard to Development Management objectives. The key points of note include:

- Revised set back distances. 4 times the tip height is to be applied between turbines and the nearest point of the curtilage of any residential property with a mandatory minimum set back distance of 500 meters to be applied.
- Revised noise limits provide a higher level of protection to nearby residential receptors. The draft guidelines propose a noise limit, referred to as a Relative Rated Noise Limit in the range of 35 – 43 dB(A), while not exceeding the background noise level by more than 5dB(A) with an upper limit of 43 dB(A).
- The draft guidelines confirm a policy of zero shadow flicker at nearby existing dwellings or other affected properties.
- Wind energy developers will have to provide an opportunity for the proposed development to be of enduring economic or social benefit to the local community, whether by facilitating community investment/ ownership in the project, other types of benefits/ dividends, or a combination of the two.
- The revised guidelines encourage the implementation of a standardised operational period of 30 years for wind energy developments across the country.

The CGEP has been designed in accordance with the current statutory Section 28 Ministerial Guidelines, Wind Energy Development Guidelines 2006. We are aware that these guidelines are subject to targeted review. The layout and design of the wind farm can comply with the key elements of the “Draft Revised Wind Energy Development Guidelines”, published by the Department of Housing, Planning and Local Government (December 2019), as listed above, including commitment to zero shadow flicker, community support and provision of a minimum 750m setback distance from the nearest residential properties.

The proposed layout has sought to achieve an optimum separation distance between dwellings and the proposed turbines by providing a separation distance of 750m between turbines and the closest dwelling buildings.



The Draft Revised Guidelines outline a minimum 500m or 4 times tip height set back which has been exceeded for the proposed CGEP.

The operational noise assessment as detailed in Chapter 7 of this EIAR has been based on the relevant guidelines at the time of assessment (Wind Energy Development Planning Guidelines, 2006), however, the noise assessment has regard to the Draft Revised Wind Energy Development Guidelines (December 2019). We note that the Draft Revised Guidelines are currently under review and will likely be subject to revision.

4.7.3 Irish Wind Energy Association – Best Practice Guidelines for the Irish Wind Energy Industry

The ‘Best Practice Guidelines for the Irish Wind Energy Industry’ were published by the Irish Wind Energy Association in 2008 and the Guidelines were updated in 2012.

These guidelines are to encourage responsible and sensitive wind farm development, and to provide assistance and recommendations for those developing onshore wind projects in Ireland. The approach taken throughout the development process of the CGEP has been in line with the 2012 IWEA guidelines.

4.7.4 IWEA Best Practice Principles in Community Engagement and Community Commitment 2013

IWEA published its Best Practice in Community Engagement and Commitment in 2013. IWEA and its members support the provision of financial contributions by wind farm operators to local communities and have sought to formulate best practice principles for the provision of a community commitment. The document sets out IWEA’s best practice principles for delivering extended benefits to local communities for wind farm developments of 5MW or above.

Best Practice Principles of community engagement when planning the engagement strategy and preparing associated literature are also outlined in the document. The aim of the publication is to ensure that the view of the local communities is taken on board at all stages of development and that local communities share in the benefits of the development. Throughout the consultation process for this project specific regard has been taken of this guidance document. Details of the public and stakeholder consultation process carried out throughout the development of the project is detailed in Chapter 5 – EIA Scoping, Consultation and Key Issues.

4.7.5 Code of Practice for Wind Energy Development in Ireland – Guidelines for Community Engagement

In December 2016, the Department of Communications, Climate Action and Environment (DCCA) issued a code of practice for wind energy development in relation to community engagement.

This Code of Good Practice:

“is intended to ensure that wind energy development in Ireland is undertaken in observance with the best industry practices, and with the full engagement of communities around the country.”

The guidance states that the methods of engagement should reflect the nature of the project and the potential level of impact that it could have on a community. Throughout the consultation process the applicant has had regard to the Code of Practice for Wind Energy including the practical steps that wind farm promoters should comply with in engaging with communities as set out in this Guidance.



4.7.5.1 *Commission for Regulation of Utilities: Grid Connection Policy*

The Commission for Regulation of Utilities (CRU) (previously the Commission for Energy Regulation (CER)) launched a new grid connection policy in March 2018 for renewable and other generators, known as ECP-1, which will seek to allow “shovel ready” projects that already have a valid planning permission, connect to the electricity networks. The principal objective which guides this decision is to allow those projects which are ‘shovel ready’ to have an opportunity to connect to the network, along with laying the foundations for future, more regular batches for connection.

The first connection offers were issued in August 2018 with the system operators expected to hold a further batch as soon as reasonably practical following the conclusion of the 2018 batch. The CRU expects that efficient and timely processing of the 2018 batch will allow the next batch to start in 2019/2020.

The ECP-1 system replaces the previous ‘Gate’ system of grid connection applications. The grid connection application window under ECP-1 is the first time since 2007 that certain renewable energy projects including wind farms, have had an opportunity to secure a new grid connection offer.

4.7.6 Renewable Electricity Support Scheme (RESS)

The new RESS scheme was launched in July 2018. The RESS is different to previous support schemes as it proposes to support renewable electricity projects through a series of scheduled, competitive auctions.

The primary policy objectives relevant to RESS include delivering our renewable electricity ambitions; increasing community participation in and ownership of renewable electricity projects, ensuring value for electricity customers and enhancing security of supply. The new scheme will help deliver Ireland’s contribution to the EU-wide binding renewable energy target of 32% RES by 2030 and the nation’s renewed targets of 70% electricity produced by renewable sources by 2030 as set out in the Climate Action Plan (2019).

In February 2020 the Government of Ireland published the ‘Terms and Conditions for the First Competition Under the Renewable Electricity Support Scheme RESS 2020’. The Renewable Electricity Support Scheme (RESS) is an auction scheme in which renewable energy projects bid for grid capacity. The noted document sets out the terms and conditions that apply to the first competition, RESS - 1.

Eligible projects under RESS include onshore wind, offshore wind, solar, hydro along with many other renewable generation methods. Should an applicant be successful under this system they will be invited to submit an offer price on their RESS project.

The results of the RESS-1 auction were published in August 2020. Successful onshore wind projects accounted for up to approximately 480MW of capacity. RESS-2, the second Renewable Energy Support Scheme auction, is likely to begin pre-qualification in Q2 of 2021, highlighting the governments push towards a transition to a low carbon economy and the achievement of renewable energy targets as set out in the Climate Action Plan (2019).



4.8 Conclusion

It is clear from the above that there is significant international, European, national and local policy support for a move to renewable energy technologies. Ireland is committed to meeting International and European targets and if these targets are not met the government must purchase Carbon Credits to meet compliance with both emissions and renewable energy targets or face fines from the EU.

The SEAI report: Renewable Energy in Ireland (2020) sets out the nation's progress towards 2020 targets, with an overall shortfall expected as renewable energy production accounts for approximately 11% of the nation's energy production while a 16% target has been set for 2020. There is potential for Ireland to achieve its 2020 renewable electricity target (40%) by Q4 of 2020 if progress continues in the installation of renewable energy projects. This was confirmed by IWEA in a press release in August 2020 (IWEA, 2020). However, as detailed in the Comptroller and Auditor General's Report on the Accounts of the Public Services 2018, the shortfall of renewable energy could result in costs of the order of €110 million per year, with up to approximately €14 million to also be spent on purchasing credits to meet the 2020 targets. This is in addition to €121 million that has already been spent as part of Ireland's strategy to meet its targets.

While Ireland has come a long way in increasing renewable energy generation, the targets are ever increasing from a European perspective. 2050 European targets effectively mean that Europe's energy production will have to be almost carbon-free by 2050, with an aim to increase reliance on renewables from 30% to 70% by 2030.

In response to this, Ireland produced the Climate Action Plan (2019) which aims to steer the country towards clean energy and reduce emissions. The CAP sets out an objective to more than double Ireland's onshore wind energy capacity to 8.2GW by 2030, greatly reducing the nation's dependency on fossil fuels. Therefore, there is a clear national mandate to accommodate significant onshore wind within the next decade. Furthermore, the National Planning Framework emphasises a move to a low-carbon economy to reduce Ireland's carbon footprint by integrating climate action into the planning system in support of national targets.

It is this commitment on energy and climate policy that justifies a clear need for renewable energy generation in Ireland. It is recognised that there are a range of renewable resource alternatives that could be explored to meet our International and European commitments however onshore wind is recognised as being the most economically competitive as emphasised in the Climate Action Plan 2019.

The Regional Spatial and Economic Strategy (RSES) for the Southern Region supports the increased use of renewable energy sources to transition the Southern Region to a low carbon, climate resilient and environmentally sustainable economy and mitigate against climate change. The RSES aims to leverage the Southern Region as a leader and innovator in sustainable renewable energy generation, supporting the development of a renewable energy project in an appropriate location, such as that of the proposed CGEP, in line with objective RPO 99 of the RSES.

National and regional energy policies have been reinforced by the Cork County Development Plan 2014 which applies a plan-lead approach to wind energy development. The Coom Green Energy Park is located within an area considered to have capacity for wind energy development and is considered compatible with the existing land use on the site as discussed in detail in Chapter 11.

In conclusion, the policy context for the site and surrounding area is considered favourable for the proposed Coom Green Energy Park, both from a national policy perspective with regard to renewable energy provision, and at a local level with respect to designations and the ability for the site to accommodate the proposed development.



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