Derrygrogan Little Solar Farm

Planning Support Statement

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1 Introduction

This Planning Support Statement has been prepared by Tetra Tech RPS, commissioned by Renewable Energy Systems (RES) on behalf of Ballyteige Solar Limited 'BSL' ('the Applicant') for the development of a Solar Photovoltaic (PV) development ('the Proposed Development') in the townlands of Derrygrogan Little and Derrygrogan Big, Tullamore, Co. Offaly ('the Application Site').

1.1 Proposed Development

The Application seeks planning permission for the following development (hereafter referred to as 'the Proposed Development'):

"The development will consist of planning permission for a period of 10 years to construct and complete a Solar PV development (i.e. a relevant solar energy development as per the Renewable Energy Directive III) with a total site area of c. 28.1 hectares, to include solar PV ground mounted support structures, string inverters, transformer stations, electrical cabling and ducting, internal access tracks and hardstanding areas, perimeter fencing and access gate, CCTV, a temporary construction compound and other ancillary infrastructure including drainage, additional landscaping and habitat enhancement as required and associated site development works relating to the access of the site. The solar farm will be operational for 40 years in the townlands of Derrygrogan Little and Derrygrogan Big, Tullamore, Co. Offaly. A Natura Impact Statement (NIS) has been submitted with this application. This development is covered by the provisions of the Renewable Energy Directive III (Directive (EU) 2023/2413) and it is important to note that the planning application may be subject to section 34D of the Planning and Development Act 2000, as amended. When a notice issues in accordance with section 34D(b), the provisions of article 26A of the Planning and Development Regulations 2001 to 2025 shall apply".

An abridged version of the Proposed Development description is provided within the supporting documents listed below.

1.1.1 Application Documents

This Planning Support Statement should be read alongside the supporting documents submitted with the planning application.

Table 1-1: Application Documents

Title	Author
Planning Application Drawing Pack	RES
Acoustic Impact Assessment	RES
Flood Risk Assessment and Drainage Impact Assessment	Tetra Tech RPS

Transport Statement including Outline Construction Traffic Management Plan	Tetra Tech RPS
Outline Construction Environmental Management Plan (OCEMP)	Tetra Tech RPS
Landscape & Visual Impact Assessment (LVIA), Landscape Mitigation Plan and Restoration Plan	Tetra Tech RPS
Glint and Glare Study	Pager Power
Archaeological & Cultural Heritage Assessment	John Cronin & Associates
Ecological Impact Assessment (EcIA) Report	Tetra Tech RPS
Archaeological Testing Report	Gahan and Long
Report to Inform Screening for Appropriate Assessment and Natura Impact Statement	Tetra Tech RPS

1.2 Need for the Proposed Development

The Sustainable Energy Authority of Ireland (SEAI) released the latest energy supply trends[1] show that in 2024, Ireland's energy demand rose by 2.3%, driven by increases in oil, natural gas, renewables, and electricity, despite declines in coal and peat. Fossil fuels remain dominant, accounting for 81.3% of supply, with nearly half (48.8%) from imported petroleum. Import dependency reached 79.6%, up from 78.3% in 2023, compared to the EU average of 58.3%. Ireland imported all its oil, 79.5% of its gas, and 14% of its electricity.

In terms of trends in electricity supply, SEAI outlined that in 2024, Ireland required a 4.2% increase in electricity supply relative to 2023. Ireland imported 13.9% of its gross electricity supply via international interconnectors in 2024, an increase from 9.4% the previous year. After electricity generation from natural gas (42%) and wind (32%), net imports of electricity across interconnectors were the third largest source of electricity supply in 2024.

Regarding trends in renewable energy supply, renewable energy supplied 14.6% of Ireland's energy requirements, which is up slightly from 14.0% in 2023. In 2024, solar power made a greater contribution to electricity generation, with output from solar PV increasing by 69% compared to the previous year.

The European Climate Law sets a legally binding target for the EU and its member states, including Ireland, to achieve net zero greenhouse emissions by 2050.

At a national level this commitment is underpinned by a series of plans and legislative documents to reinforce interim targets and the actions required to achieve same. This includes:

[1] https://www.seai.ie/data-and-insights/seai-statistics/key-publications/energy-in-ireland

- The Climate Action Plan 2019 and consequent updates
- The Climate Action Charter
- The Climate Action and Low Carbon Development (Amendment) Act 2021

Operational planning policy from national to local levels is underpinned by the requirement to address the climate emergency holistically and to be cognisant of those targets and commitments contained within the above referenced documents (which are reviewed within Section 5.4 – Other Material Considerations of this Planning Support Statement).

Ireland's overarching legislative and policy framework strongly supports the accelerated deployment of renewable energy generation. The National Planning Framework (NPF) explicitly acknowledges the vital role of renewable energy development in driving the transition to a low-carbon society and economy.

The Climate Action Plan 2025 (CAP 25) aims to cut emissions from the electricity sector by 75% by 2030. To achieve this, CAP 25 places greater emphasis on expanding solar energy, with targets of up to 5 gigawatts (GW) of installed solar energy capacity by 2025 and 8 GW by 2030. As of November 2025, only 2 GW of solar energy has been installed[2]. To achieve the CAP 25 target of 8 GW by 2030, deployment of solar energy must accelerate significantly over the coming years.

The National Mitigation Plan 2017 sets out that the deployment of solar PV in Ireland has the potential to contribute to our renewable energy targets. This is supported by ESB, which reported that at the peak of summer 2025, solar supplied over 21% of national electricity demand[1], demonstrating its potential and capacity to assist with achieving Ireland's renewable energy targets.

The White Paper: Ireland's Transition to a Low Carbon Energy Future 2015 – 2030 outlines that the deployment of solar in Ireland has the potential to increase energy security, contribute to renewable energy targets and support economic growth and jobs. The construction and operation of the Proposed Development will increase Ireland's installed solar energy, supporting national targets, while also delivering economic and social benefits.

[2] 2 GW of Installed Solar Power Surpassed - A Landmark in the Nation's Clean Energy Journey

2 Application Site and Surroundings

The Proposed Development is located within the townlands of Derrygrogan Little and Derrygrogan Big in County Offaly. The Application Site for the Proposed Development is located in a generally rural agricultural setting, approximately 7.2km northeast of Tullamore and c. 23 km to the south of Mullingar. . The Application Site occupies an area of approximately 28.1 hectares (ha) and is occupied by agricultural fields bounded by hedgerows, shrubs and mature trees. Centred at approximate Irish Grid Reference (ITM) X 241126 Y 229185, the Application Site is relatively flat and lies at an elevation of approximately 77 – 100m above ordnance datum (AOD). Field pattern surrounding the Proposed Development site is typically small to medium in scale and of a similar in character to the Proposed Development site. Field pattern is well defined by a combination of established field boundary hedgerows, woodland copses and hedgerows with mature trees, which creates a strong sense of enclosure.

An area of Cutover Peat is located immediately east of the Application Site. The L1025 and L1022 are located north of the Application Site, and the Derrygrogan Little Road (L1023 local road) is located immediately west where access to the Proposed Development is proposed. The surrounding area comprises scattered dwellings and clusters of farm buildings. The Grand Canal runs in a general east to west direction, approximately 1.6km to the south of the Proposed Development. The Kilmurry Bog Walk & Nature Trail is located adjacent to a small portion of the northern boundary, whilst the Ballycommon Greenway, forming part of the wider Grand Canal Greenway walking route is located approximately 1.6km south of the site at its closest point. Hedgerow and vegetation along the northern edge of the Kilmurry Bog Walk & Nature Trail screen views of the site from properties located on the L1025 to the north.

The Proposed Development has taken account of the Application Site's location relative to a number of features of interest, including; Raheenmore Bog Special Area of Conservation (SAC), located c. 2.7km to the north-east of the Proposed Development; Split Hills and Long Hill Esker SAC, located c. 6.5km to the north; and, Charleville Wood SAC, located c. 9km south-west of the Proposed Development. Daingean Bog Natural Heritage Area (NHA) is located c. 3.7km south-east of the Application Site and Cloncrow Bog (New Forest) NHA is located c. 7.8km to the north. The Grand Canal proposed Natural Heritage Area (pNHA) is located c. 1.6km south of the Proposed Development, Raheenmore Bog pNHA is located c. 2.7km north-east, Murphy's Bridge Esker pNHA is located c. 3.3km north-west, Derrygolan Esker pNHA is located c. 7km north-west, Ballyduff Wood pNHA is located c. 8.2km west, Ardan Wood pNHA is located c. 6km north-west and Split Hills and Long Hill Esker pNHA is located c. 6.6km north of the Proposed Development.

There are two watercourses located in proximity to the Application Site; the Derrygrogan Little Stream, located c. 145m north-east, and the Kilmurry Stream, located immediately adjacent to the site to the north-east. Both streams are tributaries of the Silver River (Puttaghan Ditch). The Application Site is not directly hydrologically connected to a Natura 2000 site. The Application Site is not at risk of flooding and is located entirely within Flood Zone C, as defined in the OPW Guidelines.

There are no recorded archaeological features located within the Application Site.

2.1 Site Selection

The Applicant undertook a comprehensive assessment of the Proposed Development site in view of relevant policies, technical assessments and planning considerations. Policy CAEP-35 of the Offaly County Development Plan 2021-2027 ('Offaly CDP') sets out that solar farm proposals must have had regard to appropriate site selection, including developing solar farms on previously developed and non-agricultural land, provided it is not of high environmental value. Although the Proposed Development site is situated on agricultural land, it will continue to support agricultural activities through sheep grazing, supporting a dual use. The site has also been assessed as not environmentally sensitive, as confirmed by the accompanying environmental reports included in this planning application. The Proposed Development site initially underwent environmental surveys which revealed the site to be capable of accommodating a solar energy development of this scale. The initial site surveys had regard to surrounding environmental sensitivities including biodiversity, population and human health, archaeology, water and landscape. Furthermore, during the detailed design stage of the Proposed Development, appropriate setback distances were implemented to sensitive features.

As outlined above, the selection of the site on agricultural land will also enable a dual use between renewable energy and farming practices. Sheep grazing will not be impeded by the proposed infrastructure and therefore the site will continue agricultural use.

The development of the proposal has followed the direction provided by the Offaly CDP DMS 110 in respect of the application of the following site selection criteria:

- The Application Site is situated on low lying lands.
- The Application Site is located in an area that facilitates connection to the Derrygrogan Big Solar Farm which in turn connects to Ballyteige Solar Farm. The latter is subject to a recent Strategic Infrastructure Development (SID) application 110kV substation within Field 1 of Ballyteige Solar Farm and underground grid connection submitted to An Coimisiún Pleanála concurrently with the Ballyteige solar amendment application. The Proposed Development will therefore be ideally positioned to enables onward connection to the electricity networks.
- The Proposed Development will not result in the loss of productive agricultural land; and,
- The Proposed Development Site benefits from a south facing aspect and is free from obstacles that may cause shading so that existing vegetation around the site can be retained, thereby minimising any loss of biodiversity.
- Having considered the environmental, landscape and visual impacts arising from the Proposed Development itself and in combination with the consented and proposed developments within the vicinity there are no likely significant individual or cumulative impacts arising from the construction, operation or decommissioning of the Proposed Development.

A full assessment of the Proposed Development against the site selection criteria as outlined in Offaly CDP DMS 110 is provided in Section 5.3.1.1 below.

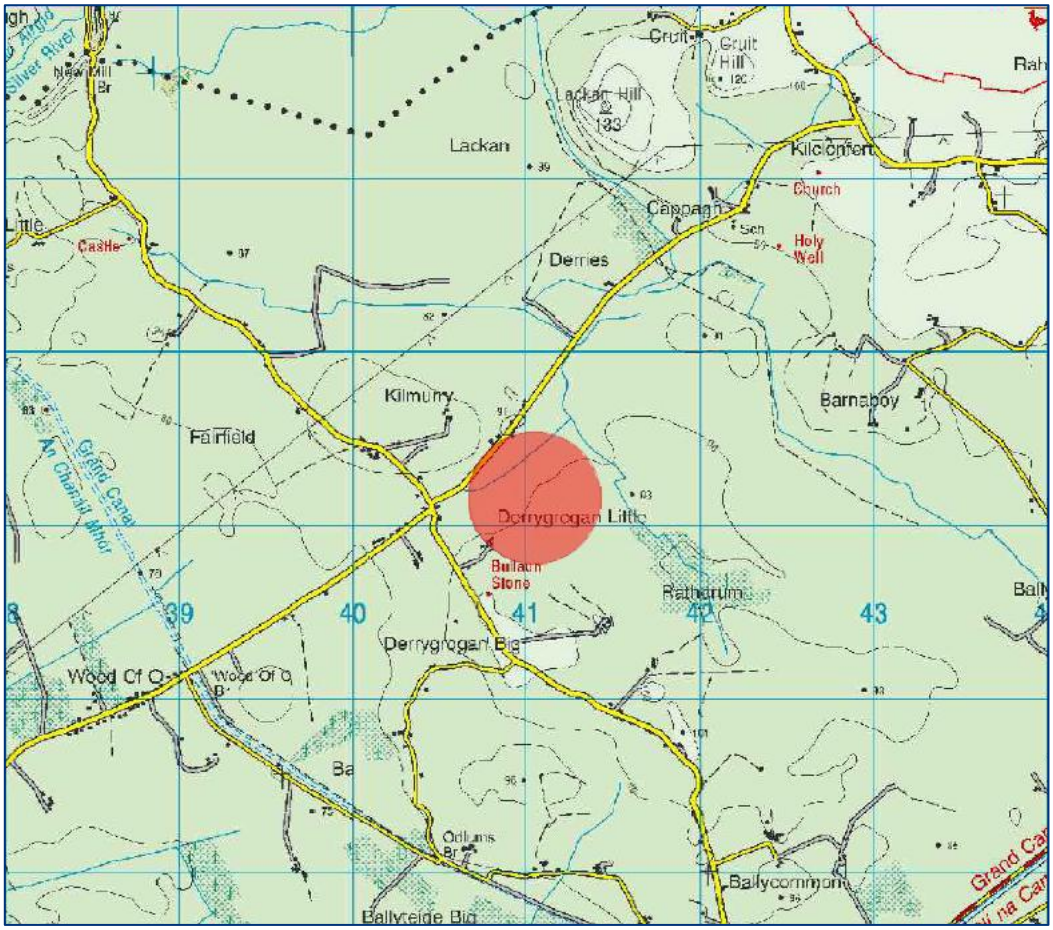

Figure 2-1 Site Location

2.2 Cumulative Assessment

A review of existing, permitted and proposed developments in proximity to the Proposed Development site has been undertaken. To assess for cumulative impacts, a review of Offaly County Council's online planning portal, the EIA Portal and An Coimisiún Pleanála's ('ACP/the Commission') website was completed.

Table 2-1: Developments Considered for Cumulative Assessment

Development	Reference No.	Development Description
Colehill (Ballyteige Solar Farm) new substation and grid connection	-	SID application submitted for 110kV substation and underground connection
Ballyteige solar farm amendment application	-	Amendment to previously consented development (Planning Ref: 2198) including the removal of the 38kV substation and infrastructure within the most northern field (Field 1), minor modifications to the solar farm layout, adjustment of the development period from 5 years to 10 years and increase the operational lifetime from 35 years to 40 years.

Derrygrogan Big Solar Farm	22/378 (ACP Reference 318041-23)	73.9ha solar farm development.
Ballyteige Solar Farm	21/98	60.53ha solar farm development.
Derries Solar Farm	21/8	53.7ha solar farm development.
Ballyduff Solar Farm	17/11, 23/15, 23/16, 25/60334	17.7ha solar farm development.
Gormagh Solar Farm	22/387 (ACP Reference PL19.318001)	83.55ha solar farm development.
Mount Lucas Wind Farm	09/453 (ACP Reference PL.19.237263), 11,232, 15/26	Wind farm development consisting of 28 no. wind turbines.
Clonarrow Wind Farm	25/60189	Wind farm development consisting of 4 no. wind turbines.
Clonminch Tullamore	20579	Conditional approval for 2 no. energy storage containers with a capacity of up to 10mw and associated transformers, inverters, a switchroom building of approximately 88m2 (containing switch and control rooms), internal cabling, electrical and communications.
Derrynagall/ Ballydaly Tullamore	18167	Conditional approval for a grid system services facility within a total site area of 0.84 hectares, to include 1 no. single storey electrical substation building, 1 no. customer switchgear container, 17 no. 2mw electrical inverter/transformer station modules (skids), 10 no. cont
Ballyduff Townland Tullamore	23315	Conditional approval for replacement of a permitted single storey terminal electrical station and separate permitted switchgear enclosure (both previously permitted as part of a solar farm permission by Offaly County Council under planning ref. 17/11)
Tullamore Distillery Campus, Ballard & Clonminch, Tullamore	2460250	Conditional approval for construction of a solar PV development with an installed capacity of up to 2.6 MWdc (MEC=0) to provide electrical power to the existing distillery comprising approximately 4,100 no. photovoltaic panels on ground mounted frames etc.
Tullamore Retail Park, Cloncollog, Tullamore	2460514	Conditional approval for a new prefabricated substation building within the existing car park to cater for 5no. electric car charging points for 10no. electric car parking spaces, along with all associated ancillary site works

Residential	Various	-
Industrial	Various	-
Agricultural	Various	-

It can be concluded that with the implementation of mitigation measures, the Proposed Development, individually or in combination with any of the developments listed above, and likely cumulative environmental impacts arising from the above mentioned developments alongside the Proposed Development has been considered by the relevant experts for each of the disciplines considered in Section 6 and they have concluded that there are no likely significant cumulative impacts arising from the construction, operation or decommissioning of the Proposed Development.

3 Project Description

This Application is for the construction and operation of a solar farm comprising:

- Solar arrays, string inverters on metal support structures or on concrete foundations if archaeological mitigation measures are required);
- 7 no. Low Voltage/Medium Voltage (LV/MV) Transformer Stations with associated hardstanding areas;
- Internal access track with two perimeter gates;
- No.47 CCTV camera units;
- Site access via Derrygrogan Little Road with associated visibility splay;
- Security fencing incorporating timber posts and deer fencing;
- Cable trenching and backfilling;
- Temporary construction compound; and
- Structural landscape planting and ecological enhancement measures.

Approximately 1330m of underground cable is required to connect the proposed solar farm to the Derrygrogan Big Solar Farm. The cable will be installed within the carriageway or roadside verge of the Derrygrogan Little Road (L1023 local road). It is important to note the national grid connection does not form part of this planning application.

When operational, the site will support a dual renewable/farming use, and the land area will remain agricultural. Sheep grazing can take place across the entire area and will not be impeded by the proposed infrastructure.

Solar technology continues to evolve and improve in efficiency. While details are set out in this application, it is anticipated that the final infrastructure specifications will reflect the most efficient and commercially available technology at the time of construction. Any variations in configuration including adjustments to panel spacing angles or equipment arrangement will remain within the overall development envelope established by the extant permission and will not give rise to any materially different environmental or planning effects. To ensure Council approval of the final detailed design layout and elevations of non-substantive elements prior to construction, the applicant proposes the following pre- commencement condition:

"Prior to commencement of the development, full finalised site layout shall be submitted to the local planning authority for agreement in writing."

When complete, the Proposed Development will play a vital role in a low carbon economy facilitating the increased deployment of renewable energy generation across Ireland.

3.1 Solar Panels

The proposed panels will be mounted in frame tables at an inclination of between 10-30 degrees depending upon localised topography, as shown in the accompanying Figure 5: Typical PV Module and Pack Detail Drawing. Each frame will be supported on steel/aluminium posts/frames that will be pushed or screwed into the ground to depths of up to maximum depth of 2.4m. The string inverters will be installed on the rear of

selected frame tables. The front bottom edge of the panels will be typically 500mm above existing ground level depending on local topography. The maximum overall panel heights from ground level will be approximately 3m. The spacing between the arrays will be approximately 2m.

All panels placed on the site will be orientated to face south and are fixed in place. They do not move to follow the path of the sun. Panels are opaque in nature and are designed specifically to absorb rather than reflect the sun's rays.

Where conditions are suitable, frames will be screw-piled into the ground. This method does not require significant excavations and ground disturbance can be minimised. This method is similar to typical agricultural methods routinely used to erect fence posts on farms and in the rural area. Construction of the mounting system involves a small track machine with a ram/screw attached. This machine tracks up and down in rows installing as it goes.

3.2 String Inverters & MV Transformers Stations

Electricity generated from the solar panels will initially be routed to electrical inverters fixed to the mounting frames which combine the output of the solar array strings. The electricity received at the inverters is converted from Direct Current (DC) to Alternating Current (AC).

From the inverters, the electricity is then routed to the transformer stations where the electricity is up-rated to enable onward transmission to the national electricity network. The string inverters are connected to the MV transformer stations (as shown in the accompanying in Figure 6: Typical Transformer Station drawing) by cabling which has been buried underground. There will be 7 no. transformer stations located throughout the site which are accommodated in small modular cabin like buildings. Transformer stations typically measure c. 6.06m x 2.44m with a height of c. 3.1m. Transformer units will be placed on a hardstanding, and if required, will be surrounded by a c. 1.5m wide raised permeable walkway.

3.3 Underground Cables

All electrical cables connecting the solar panels to the electrical inverters will be above ground and fixed to the mounting frames. All other on-site electrical and associated cables will be located underground, as shown in the accompanying Figure 7: Typical Cable Trench Sections drawing.

To connect the Derrygrogan Little Solar Farm to Derrygrogan Big Solar Farm, a 33kV underground cable will exit the Application Site following the proposed access track before being located within the carriageway or roadside verge of the Derrygrogan Little Road (L1023 local road) for approximately 122m. The underground cable will then enter the lands associated with the Derrygrogan Big Solar Farm. The underground cable will be laid in ducts in an excavated trench c. 0.8mdeep with a width of c. 0.28m. Trenching will be via a mechanical digger. After the installation of underground cabling, the trench will be backfilled and reinstated. The public road will be reinstated and resurfaced following the completion of trenching works. It is anticipated that it will take approximately 2 weeks to complete works within the public road. Traffic management measures will be necessary during trenching works. The extent of these measures will be agreed with Offaly County Council

('the Planning Authority') prior to the commencement of development. The extent of trenching works will be short in duration and therefore significant effects are not likely to occur.

3.4 Site Access

Access to the Proposal Site during construction, operation and decommissioning will be via a new site entrance located east of the Derrygrogan Little Road (L1023 local road) and to the west of the site. The proposed site entrance has been assessed on its suitability in accordance with the sightline requirements as set out in the Offaly CDP, providing unobstructed views of 160m in each direction. To maintain safe and compliant sightlines at the site entrances approximately 14.8 linear meters of roadside hedgerows will be removed and subsequently replanted in line with the Landscape Mitigation Plan. The site entrance will be used to facilitate construction, operation decommissioning phase traffic. Construction traffic utilising the site entrance is estimated to be 10 vehicles and a maximum of 10 HGV deliveries i.e. 20 HGV movements a day during peak construction. Once the Proposed Development becomes operational, there will be approximately 5-10 trips per year. The decommissioning phase is anticipated to generate less traffic than during the construction phase.

3.5 Internal Access Track

The Proposed Development will be served by c. 1163m of new on-site access track to allow for access during the construction, operation and decommissioning phases of the Proposed development. The access track will have a typical running width of approximately 4m (with a typical running width of 3.5m) and will be constructed of crushed stone material to allow for rainwater permeability.

3.6 Fencing

For security purposes, the area of development will be enclosed by c. 2.4m high mesh wire deer fencing with security gates. See Figure 3-2 below and also illustrated within accompanying Figure 10 Perimeter Deer Fence drawing. The materials used are chosen to be in keeping with the landscape. The fence will accommodate small mammal gates measuring approximately 300mm x 200mm at appropriate points to allow continued unrestricted access and foraging across the site by small mammals including fox and badger.

Figure 3-2: Proposed Perimeter Fencing

3.7 CCTV

For security purposes, there will be 47 no. CCTV cameras placed strategically throughout the Application Site. These will be pole mounted to a height of approximately 3.5m, located along fence-lines and will be directed inwards and will not overlook adjacent third-party lands, as illustrated in accompanying Figure 11: Typical Security CCTV Detail drawing. The cameras are designed to not move either intentionally or unintentionally due to adverse weather conditions or animal activity. CCTV uses passive infra-red technology, thereby avoiding the need for lighting, and will enable remote surveillance of the Proposed Development.

3.8 Waste

Waste may be generated during the construction, operation and decommissioning phase of the Proposed Development, such as oils and lubricants and packaging from equipment. Toilet facilities on-site during construction will be self-contained and will be appropriately disposed of off-site by qualified contractors. All other waste will be removed from site and reused, recycled or disposed of in accordance with best-practice and at a licensed facility.

3.9 Temporary Construction Compound

At construction stage, a temporary construction compound will be required. The accompanying Figure 4: Site Layout drawing provides the proposed location of the temporary compound and Figure 8 Typical Temporary Construction Compound Layout drawing provides the proposed layout of the temporary compound. The final location and detail of this compound will be agreed with the appointed contractor prior to commencement of works. The temporary construction compound will comprise temporary cabins, vehicle parking, self-contained welfare facilities and storage and waste management areas. Following the completion of construction, the temporary construction compound will be removed from site including all structures and facilities. Further details will be provided in a detailed Construction Environmental Management Plan to be agreed with the Planning Authority prior to the commencement of development. As per standard practice, it is expected that this requirement will be conditioned as part of any planning consent.

3.10 Construction Period

The construction period of the Proposed Development is anticipated to last approximately 8 months, not allowing for holiday periods or any potential work embargos placed on construction via any planning conditions during certain periods. The Proposed Development will give rise to a number of staff vehicle trips and at peak construction, a maximum of 10 HGV movements per day at month 8 the peak of construction.

Project components will be delivered to site using standard articulated lorries.. At construction stage and upon appointment of a final supplier, appropriate mitigation measures will be implemented as part of a Construction Traffic Management Plan to be agreed with the Planning Authority prior to the commencement of development. Again, as per standard practice, this can be conditioned as a requirement of any planning consent.

3.11 Operational Period

The Proposed Development will have an operating life of 40 years after which, solar panels and associated infrastructure will be removed and the site reinstated. Please refer to Section 3.13 below.

During operation the site will largely be unstaffed. Routine maintenance activities such as the cleaning of solar panels may occur throughout the operation phase of the Proposed Development. It is envisaged that 2 vehicles per month will visit the site for maintenance purposes. Under exceptional circumstances, other maintenance activities may occur such as equipment being replaced. Some agricultural activities can continue on site including sheep grazing.

3.12 Decommissioning

At the end of the Proposed Development's operational life the solar farm will be decommissioned. This will involve the careful dismantling of the component elements including the electrical equipment and surrounding housing which encases the components. Equipment will be removed from site for reuse or recycling. The access track may be retained for continued use by the landowner for agricultural purposes. Otherwise all affected ground will be reinstated with sub soil and topsoil together with hydro seeding which will re-establish a grass sward.

The operational lifespan of the project is 40-years and over this time any landscaping associated with proposals and over this period will establish and grow to form mature hedgerows and shrubbery. As outlined within the accompanying Reinstatement Plan tree planting, hedgerow planting, screen planting and infill planting implemented as part of the Proposed Development will be retained following decommissioning. Additionally seeding will be provided to former panel areas and along the former access track. The ecological mitigation and enhancement measures such as 5 No. bird boxes, 5 No. bat boxes, 2 No. invertebrate hotels and 1 No. hibernacular implemented as part of the Proposed Development will also be retained.

All project elements will be removed from site and where possible will be recycled. Any waste generated during the decommissioning process will be removed and transported by a certified and licensed contractor. The site will be restored leaving no permanent visible trace. The solar panels will be removed from the site in the same way they were transported to the site originally. The cables interconnecting the panels to the electricity grid system will be de-energised and removed from the site, with any cable marker signs removed.

Please find in Table 3.1 below, the decommissioning costs for the development which are based on the current planning drawings and market conditions. Please note it is anticipated to keep the cables and tracks in-situ.

Table 3-1: Decommissioning Costs

Decommissioning Item	Estimate €
Mobilisation and Site Set up (Incl. compounds)	€50,000
Dismantle and remove Solar tables (incl. frames)	€190,000

Dismantle and remove ancillary electrical equipment (inverters, transformers)	€75,000
Dismantle and remove security equipment (fencing and CCTV)	€25,000
Civils (remove and reinstate foundations and steel stanchions)	€50,000
Site Restoration, landscaping and planting as required	€50,000
Total	€440,000
Total estimated costs including VAT @13.5%	€499,400

It is also important to highlight that the estimated construction costs could be +/- 15% and the costs do not include finance costs, inflation from the date of the budget, protection of goods and property, design team fees and development contribution.

A decommissioning programme will be agreed with the Planning Authority prior to the commencement of the required works. An alternative option at the end of the solar farm operational life may be for the continued operation of the solar farm. If proposed, this will be subject to a future planning application and consenting process.

4 Legislative Considerations

4.1 EIA Screening

The Planning and Development Act 2000 as amended ('the Act') (section 172(1)) requires that EIA must be carried out in the case of either of the following two scenarios:

- Where a development is of a class of development and threshold (where one is stated) specified in Part 1 or Part 2 of Schedule 5 of the Planning and Development Regulations 2001 as amended – this is referred to as mandatory EIA.
- Where a development is of a class of development specified in Part 2 of Schedule 5 but is below the threshold specified and where the development is likely to have a significant effect on the environment – this is referred to as a sub-threshold development EIA.

Solar developments are not covered by Schedule 5, Part 1 of the EIA Regulations and as such an EIA is not deemed to be a mandatory under Part 1.

We have also reviewed Schedule 5, Part 2 to identify if the Proposed Development would fall within any of these classes of development for EIA.

Schedule 5, Part 2, Item 3 relates to Energy Industry. Having reviewed the development against the contents of same, Tetra Tech RPS do not consider that it falls within this, or indeed any other class of development contained within Part 2 of Schedule 5. This position is one supported by the precedent of the Commission decisions which support the fact that solar development does not come under the umbrella of the EIA Directive.

Under Schedule 5, Part 2, Class 1(a) of the Planning Regulations, EIA is required for developments involving the restructuring of rural land holdings where field boundary removal exceeds 4km, land recontouring exceeds 5ha, or the area of land to be restructured exceeds 50ha. The Proposed Development involves only a minimal removal of hedgerow (approximately 147m) to the facilitate site entrance and access tracks. This removal is solely for vehicular access and does not constitute restructuring of existing field boundaries. The accompanying Ecological Impact Assessment Report found that subject to the implementation of mitigation and enhancement measures as proposed within the Landscape Mitigation Plan; the removal of small sections of hedgerow would have No Significant Effect on habitats, with potential for an overall Significantly Positive Effect in the long term.

Furthermore, the Proposed Development does not include significant land recontouring; only localised site levelling for hardstand and foundation works is proposed, which is not considered recontouring under the Planning and Development Regulations 2001, as amended. Therefore, the Proposed Development is not subject to EIA under Schedule 5, Part 2, Class 1(a).

Schedule 5, Part 2, Class 10(dd) of the Planning Regulations requires that any 'private road' exceeding 2,000m in length must be subject to EIA. The Proposed Development involves constructing approximately 1163m of new on-site vehicular access tracks to enable access across the site during construction and operation phases. These tracks will consist of permeable stone aggregates and will be used infrequently during the operational phase for site maintenance. It is assessed that these on-site access tracks do not constitute the construction

of a 'private road' under the Planning and Development Regulations 2001, as amended, and are materially different from a 'road' as defined in the Roads Act 1993. Therefore, the Proposed Development is not required to be subject to EIA pursuant to Schedule 5, Part 2, Class 10(dd).

Accordingly, it is considered that the Proposed Development is not a class of development for EIA and cannot be construed as either mandatory or sub-threshold EIAR development.

4.2 Appropriate Consent Route – Screening for SID

4.2.1 Consideration of Proposed Development as Strategic Infrastructure Development

The types and sizes of development that fall under the classification of Strategic Infrastructure Development (SID) under section 37A of the Act are set out in the Seventh Schedule to the Act. They include large projects in the energy, transport, environmental and health infrastructure sectors. To qualify as a SID, a proposed development must be one of the specific classes prescribed in the Seventh Schedule and must exceed the defined development thresholds for that class.

The Proposed Development does not fall within the terms of the Seventh Schedule.

Developments may also be classified as SID in certain circumstances including electricity transmission development referred to in section 182A (1) of the Act.

The Proposed Development has been considered against the Commission's 'Strategic Infrastructure Development (SID) Electricity Transmission Guidelines' which outline how the Commission define electricity transmission network infrastructure under the strategic infrastructure provisions of the Act.

Section 182A (1) of the Act requires that where a person (referred to as 'the undertaker') intends to carry out development comprising or for the purposes of electricity transmission, the undertaker shall prepare an application for approval of the development to the Commission.

Section 182A (9) of the Act states:

"'transmission' in relation to electricity, shall be construed in accordance with section 2(1) of the Electricity Regulation Act 1999 but, for the purposes of this section, the foregoing expression, in relation to electricity, shall also be construed as meaning the transport of electricity by means of:

(a) a high voltage line where the voltage would be 110kV or more, or

(b) an interconnector, whether ownership of the interconnector will be vested in the undertaker or not".

Section 2(1) of the Electricity Regulation Act 1999 defines transmission as:

"in relation to electricity, means that transport of electricity by means of a transmission system, that is to say, a system which consists, wholly or mainly, of high voltage lines and electric plant and which is used for conveying electricity from a generating station to a substation, from one generating station to another, from one substation to another, or to or from any interconnector or to final customers but shall not include any such lines which the Board may, from time to time, with the approval of the Commission, specify as being part of the distribution system but shall include any interconnector owned by the Board".

Section 2(1) of the Electricity Regulation Act 1999 defines 'electric plant' as:

"any plant, apparatus or appliance used for, or for purposes connected with, the generation, transmission, distribution or supply or electricity, other than –

(a) An electric line

(b) a meter sued for ascertaining the quantity of electricity supplied to any premises; or

(c) an electrical appliance under the control of the consumer."

As set out previously, the Proposed Development does not include a connection to the national electricity network. The Proposed Development will connect into the consented Derrygrogan Big Solar Farm, via a 33kV underground cable.

As the Proposed Development does not fall within the provisions of Section 2(1) of the Electricity Regulation Act 1999, it is consequently submitted that it does not fall within Section 182A (9) of the Act.

4.2.2 Section 34 is the Appropriate Planning Consent Route

Having concluded that neither section 182A nor section 37A apply in the case of the Proposed Development, then the appropriate planning consent route for this application is a Section 34 application to the local planning authority; Offaly County Council.

5 Planning Policy & Other Material Considerations

5.1 Introduction

The legal framework for the planning system in Ireland is the Planning and Development Act 2000, as amended, which states the purpose of the legislation is 'to provide, in the interests of the common good, for proper planning and sustainable development'.

Section 34(2)(a) of the Act confirms that, when making a decision in relation to a planning application, the planning authority shall be restricted to considering the proper planning and sustainable development of the area, having regard to:

i. The provision of the development plan;

ii. The provision of any special amenity area order relating to the area;

iii. Any European site of other area prescribed for the purposes of Section 10(2);

iv. Where relevant, the policy of the Government, the Minister or any other Minister of the Government;

v. The matters referred to in subsection (4); and,

vi. Any other relevant provision or requirement of this Act, and any regulations made thereunder.

5.2 National and Regional Policy

5.2.1 Project Ireland 2040 – National Planning Framework

The National Planning Framework (NPF) is a national document guiding high-level strategic planning and development for the country over the next 20+ years, so that as the population grows, that growth is sustainable (in economic, social and environmental terms). The NPF states that: "While the overall quality of our environment is good, this masks some of the threats we now face. Some of the key national environmental challenges include the need to accelerate action on climate change".

The Proposed Development will make a positive contribution to the achievement of several National Policy Objectives that relate directly to climate change:

- NPO 8 seeks to drive a transition towards a low carbon and climate resilient society. Incorporating a more renewable energy focused approach prioritising energy sources such as solar, wind and wave. At the time of publication of the Framework, the target was to deliver 40% of the national energy needs via renewable energy by 2020. That target has been subject to significant revision as outlined further below.
- NPO 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.

- NPO 23 Facilitate the development of the rural economy through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture, energy and extractive industries, the bio-economy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism.
- NPO 53 Support the circular and bio economy including in particular through greater efficiency in land management, greater use of renewable resources and by reducing the rate of land use change from urban sprawl and new development.
- NPO 54 Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.
- NPO 55 Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050.

5.2.2 Project Ireland 2040 – National Development Plan 2021 – 2030

A National Development Plan (NDP) review was undertaken to help inform the drafting of the new 2021 NDP. This resulted in a series of recommendations including a commitment to increase the share of renewable energy to 80%. To facilitate this will require strengthening the reliability of electricity supplies through investment in the electricity grid network, to be complemented by measures such as investment in energy storage.

The National Development Plan 2021 – 2030 (NDP) sets out a number of Strategic Investment Priorities for the achievement of the National Strategic Objectives of the National Planning Framework. Chapter 13 of the NDP is entitled, “Transition to a Climate-Neutral and Climate-Resilient Society.” Among the actions to support Strategic Investment Priorities listed are:

- Renewable Energy Support Schemes to help deliver a mix of onshore and offshore renewables.
- Expansion and strengthening of the electricity grid to inter-alia accommodate higher levels of renewables.

It is recognised that private investment will be critical to effect the transition and embed circularity across all sectors. To support the circular use of critical raw materials, private investment will also facilitate a sustainable supply of minerals necessary for the development of solar, wind and battery technologies.

The Proposed Development will assist in the achievement of these national objectives

5.2.3 Eastern and Midlands Regional Spatial and Economic Strategy 2019 – 2031

The Eastern and Midlands Regional Spatial and Economic Strategy (RSES) provides a high-level development framework for the Eastern and Midland Region that supports the implementation of the National Planning Framework (NPF) and the relevant economic policies and objectives of Government.

The Proposed Development draws support from and will assist in delivery of a number of the RSES Regional Policy Objectives (RPO) including:

- RPO 6.23: Support enterprises to create and employ green technologies and to take measures to accelerate transition to a low carbon economy;
- RPO 7.43: Aimed at ensuring the resilience of critical infrastructure including electricity networks to inform longer term adaptation planning and investment prioritisation; and
- RPO 10.20: Supporting the development of enhanced electricity supplies and associated networks in a way that facilitates renewable energy proposals.

The Proposed Development of a solar energy development at this location will support the green energy transition and resilience.

5.3 Offaly County Development Plan 2021-2027

The Offaly CDP is supportive of the development of renewable energy systems to limit greenhouse gas (GHG) emissions which make use of natural resources, in an environmentally friendly manner. The CDP aims to achieve a reasonable balance between responding to government policy on renewable energy and in enabling the natural resources of the county to be harnessed in an environmentally sustainable matter.

5.3.1 Policy

The core Strategy Aim of the Offaly CDP in regard to climate action and energy is "*to achieve a transition to an economically competitive, low carbon climate resilient and environmentally sustainable county, through reducing the need to travel, promoting sustainable settlement patterns and modes of transport, and by reducing the use of non-renewable resources, whilst recognising the role of natural capital and ecosystem services in achieving this*". The Offaly CDP outlines that large solar farms have potential to be built on agricultural land which can function as a dual use with farm practices, such as grazing.

5.3.1.1 General Policies

The Proposed Development complies with and draws support from the following policies in the CDP:

- CAEP-10: It is Council policy to support local, regional, national and international initiatives for climate adaptation and mitigation and to limit emissions of greenhouse gases through energy efficiency and the development of renewable energy sources which make use of all natural resources, including publicly owned lands, in an environmentally acceptable manner;
- CAEP-11: 1 It is Council policy to support the transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050, by way of reducing greenhouse gases, increasing renewable energy, and improving energy efficiency;
- CAEP-25: It is Council policy to encourage and facilitate the production of energy from renewable sources, such as from bioenergy, waste material, solar, hydro, geothermal and wind energy, subject to proper planning and environmental considerations.

- CAEP-26: It is Council policy to encourage developers of proposed large scale renewable energy projects to carry out community consultation in accordance with best practice and to commence the consultation at the commencement of project planning;
- CAEP-27: It is Council policy to ensure that whenever possible, community benefits are derived from all renewable energy development in the county such as near-neighbour benefit funds and general community benefit funds, which may take the form of contributions in kind to local projects, assets and facilities such as public amenities on the renewable energy site, measures to promote energy efficiency or a local energy discount scheme;
- CAEP-29: It is Council policy to support the circular economy and within that the bio-economy including in particular through greater efficiency in land management, greater use of renewable resources and by reducing the rate of land use change from urban sprawl and new development, resulting in optimal socioeconomic and environmental impacts such as resource efficiency and reduction of greenhouse gas emissions;
- CAEP-34: It is Council policy to promote the development of solar energy infrastructure for on-site energy use, including solar PV, solar thermal and seasonal storage technologies subject to Offaly County Development Plan 2021-2027 Chapter 3 Climate Action and Energy Page 95 environmental safeguards and the protection of natural or built heritage features, biodiversity views and prospects; and,
- CAEP-35: It is Council policy to ensure that the assessment of solar farm proposals will have regard to:
    - Site selection, by focusing in the first instance on developing solar farms on previously developed and non-agricultural land, provided that it is not of high environmental value.
    - Where a proposal involves greenfield land, whether (i) the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land; and (ii) the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays. Decommissioning and site rehabilitation plans will be required providing for the land to be restored to its previous use.

The Proposed Development complies with the CDP in that it has been designed to leave room for dual land use so that farm practices, in the form of sheep grazing and can co-exist with the ground mounted solar panels.

The development of the proposal has followed the direction provided by the CDP in respect of the application of the following site selection criteria:

- The Application Site is situated on low lying lands.
- The Application Site is located in an area that facilitates connection to the Derrygrogan Big Solar Farm which enables onward connection to the electricity networks.
- The Proposed Development will not result in the loss of productive agricultural land.

- The Proposed Development Site benefits from a south facing aspect and is free from obstacles that may cause shading so that existing vegetation around the site can be retained, thereby minimising any loss of biodiversity.
- DMS-110 Solar Farms: The Council will consider the following factors in assessing a planning application for a solar farm;
    - The reuse of previously developed land such as brownfield land, contaminated land or industrial land and non-productive agricultural land in preference to productive agricultural land;
    - **Response:** The Proposed Development will support a dual use for agriculture and sheep grazing. The majority of the land within the Proposed Development is relatively low lying agricultural in nature as if the surrounding land, however there are areas of bogland. Bogland is more ecologically sensitive and therefore more difficult to develop on. The Proposed Development respects the environment, and the land will be more sustainably used through the dual-use of less intensive grazing and production of renewable energy. It should be noted that sufficient setbacks have been provided based on noise, glint and glare, landscape and visual and other environmental considerations. The Proposed Development will not result in any significant effects. As illustrated within the landscape Mitigation plan that were submitted as part of the application, this Proposed Development will result in significant biodiversity gains, these measures include bird and bat boxes, hibernaculum and planting of hedgerows and other native species.
    - The proximity of the proposal to the electricity infrastructure such as substations and indicative proposals to connect to existing or proposed grid connections;

      Response: The Proposed Development is ideally located to facilitate a connection to the Derrygrogan Big Solar Farm which enables onward connection to the proposed Colehill 110kV electricity substation and Thornsberry 110kV electricity substation. It should be noted that the Offaly County Development Plan (OCDP) Climate Action and Energy 3.2.4 recommends “accessibility/proximity to electricity networks. Ability to achieve a network connection, typically via a 10kV or 20kV overhead cable on the electricity transmission grid. In general, it is not viable to locate solar farms over 1km from network infrastructure.
    - The effect of glint and glare on landscapes, traffic and aircraft safety;

      Response: A Glint and Glare assessment has been carried out and concludes there will be no significant glint and glare impact from the Proposed Development on surrounding road safety, residential amenity and aviation activity.
    - The extent to which there may be additional impacts if solar arrays follow the daily movement of the sun;

      Response: The solar array will be fixed in position and do not follow the sun’s rotation.
    - The need for, and impact of, security measures such as lights and fencing;

Response: As outlined in Section 3 above the need for fencing and CCTV has been considered and neither will have an impact upon the surrounding environment.

- The visual impact of a proposal on heritage assets, designated sites and key views and prospects identified in Chapter 4 of the Plan;

  Response: A Landscape and Visual Impact Assessment has been submitted with the planning application and confirms that, with the implementation of mitigation measures, there will be no significant effects from the construction, operation or decommissioning of the Proposed Development in terms of impact on heritage assets, designated sites or key views.

- The potential impact on the ecological characteristics and features of the site and its sensitivity to the proposed changes arising from the construction, operation and decommissioning stages of a development. On a proposed site where a significant level of ecological impact is predicted an Ecological Management Plan may be used to mitigate against the predicted impact and/or a Natura Impact Statement if applicable;

  Response: An Ecological Impact Assessment has been submitted with the planning application and confirms that, with the implementation of mitigation measures, the Proposed Development will not have a significant effect on ecological receptors and will have a significant positive effect by the implementation of biodiversity enhancement measures. The accompanying Report to find Screening for Appropriate Assessment and Natura Impact Statement found that based on best scientific knowledge, that there will be no adverse effects upon the integrity of any European site consequent upon the implementation mitigation measures prescribed in this NIS. Accordingly, the competent authority can conclude, beyond reasonable scientific doubt, that the Proposed Development, whether considered alone or in combination with other plans and projects, will not adversely affect the integrity of any European site.

- The potential to mitigate landscape and visual impacts through appropriate siting, design and screening with native hedges;

  Response: The Proposed Development is located on low lying lands, and has been subject to an iterative design process to limit landscape and visual impacts. Additional screening is proposed to mitigate potential visual impacts of the Proposed Development.

- The cumulative impact of the proposal with other ground mounted solar panels and wind turbines in the area;

  Response: The accompanying environmental reports submitted with the planning application have included a cumulative assessment with proposed and permitted developments in proximity to the Proposed Development.

- An appraisal of the existing roads infrastructure and the potential impact of the proposed development, including traffic numbers and movements during the construction, operation and

decommissioning phases of the proposal should be carried out. Evidence of appropriate sight lines at the entrance to the development from public roads shall also be provided;

Response: A Transport Statement including Outline Construction Traffic Management Plan has been submitted with the planning application. It assesses traffic impacts during the construction, operation and decommissioning phases of the Proposed Development in relation to the surrounding road network and found the Proposed Development to be acceptable, subject to mitigation measures identified. It includes a site access visibility splays and HGV swept path analysis which demonstrates appropriate sight lines will be provided at the entrance to the site.

- Adequate drainage, surface water run-off and flooding mitigation. Where access tracks need to be provided, permeable tracks should be used, and localised SUDs, such as swales and infiltration trenches should be used to control any run off. Sites should be selected and configured to avoid the need to impact on existing drainage systems and watercourses. Culverting existing watercourses/drainage ditches should be avoided unless it is demonstrated that no reasonable alternatives exist and where necessary only temporarily for the construction period. The preparation of an outline Construction Environmental Management Plan setting out key environmental management controls for all phases of the development minimising impacts on existing drainage systems and watercourses may be required; and,

  Response: A Flood Risk Assessment and Drainage Strategy has been submitted with the planning application and confirms that the Proposed Development would be safe, without increasing flood risk elsewhere, and that a positive reduction in flood risk would be achieved through the inclusion of onsite drainage features.

- Impact of the development on radio observatories and broadcast communications in the area.

  Response: The Proposed Development will not cause adverse impacts on radio and broadcast communications in the area.

5.4 Other Material Considerations

5.4.1 Climate Action Plan 2025 (CAP25)

The Government's Climate Action Plan 2025 was approved by Government on 15 April 2025 and is the third annual update to Irelands Climate Action Plan 2019. It reflects the central priority for climate change to be embedded within Ireland's political and administrative systems, setting out governance arrangements including the carbon-proofing of government policies. It is Ireland's 'all of Government Plan' to tackle climate break down and achieve net zero GHG emissions by 2050 and includes 183 individual actions which have been updated to include:

- 80% of all electricity generated to be from renewable sources;
- 30% electric vehicles on the road;

- Carbon proofing all Government decisions and major investments; and,
- Greenhouse Gas Emissions reduced by 51%.

The Proposed Development, comprising renewable energy generation, will contribute to achieving net zero GHG emissions by 2050.

5.4.2 Climate Action and Low Carbon Development (Amendment) Act 2021

The Climate Action and Low Carbon Development (Amendment) Act 2021 commits Ireland to 2030 and 2050 targets for reducing GHG emissions and providing the governance framework. This is a legally binding path to net zero emissions no later than 2050 and a 51% reduction in emissions by the end of this decade.

The Proposed Development, comprising renewable energy generation, will contribute to achieving net zero GHG emissions by 2050.

5.4.3 Climate Action Charter 2019

The Climate Action Charter followed the publication of the Climate Action Plan 2019 and represented a collective agreement on the part of Local Government across the State, with all 31 no. local authorities signing an agreement to commit to actions delivering climate action in their communities, through the actions set out in the Climate Action Plan.

The Climate Action Charter requires all local authorities to:

- Put in place a process for carbon proofing major decisions, programmes and projects on a systematic basis, including investments in transport and energy infrastructure;
- Deliver a 50% improvement in energy efficiency by 2030; and,
- Monitor, evaluate and report annually on the implementation of activities under the Charter.

The Proposed Development, comprising renewable solar energy generation, will enhance renewable energy infrastructure and contribute to the overall increase in clean energy production.

5.4.4 National Mitigation Plan 2017

Ireland's first National Mitigation Plan (NMP) was published in July 2017 by the Department of Communications, Climate Action and Environment. It sets out, on a whole-of-government basis, over 100 actions to examine the most effective pathways for Ireland to arrive at a low carbon and climate resilient economy by 2050.

The Proposed Development, comprising renewable solar energy generation, will enhance renewable energy infrastructure and contribute to the overall increase in clean energy production, promoting climate resilience.

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

This White Paper seeks to provide an updated energy policy framework to guide the transition to a low carbon energy system to secure supplies of competitive and affordable energy to our citizens and businesses. It highlights the aspiration to meet renewable energy targets, improve energy efficiency and reduce GHG emissions.

It recognises that the deployment of solar in Ireland has the potential to increase energy security, contribute to our renewable energy targets and support economic growth and jobs.

The Proposed Development, comprising renewable energy generation, will contribute to achieving renewable energy targets and will reduce GHG emissions.

5.4.6 EU Energy Roadmap 2050

The EU's Energy Roadmap 2050 is a long-term strategy to guide the European Union towards a low-carbon economy by 2050. It outlines various scenarios and policy recommendations for achieving an 80-95% reduction in GHG emissions compared to 1990 levels. The roadmap aims to enhance energy security, improve competitiveness, and ensure a sustainable energy system for the future. The roadmap emphasises the importance of energy efficiency as a key strategy for reducing emissions and managing energy demand.

The Proposed Development, comprising renewable energy generation, will contribute to reducing GHG emissions.

5.4.7 Renewable Energy Directive (EU) 2023/2413

The revised Renewable Energy Directive (EU) 2023/2413 (RED III) came into effect 20 November 2023. Its purpose is to make the permitting process for renewable energy projects more streamlined, efficient, and supportive of the EU's ambitious climate and renewable energy targets, while ensuring environmental safeguards and opportunities for local community involvement. In line with these binding EU requirements, Ireland's National Energy and Climate Plan 2021-2030 sets out measures to accelerate the deployment of solar and other renewable energy sources, aiming to supply 80% of electricity demand from renewables by 2030.

This Directive is a key part of the European Green Deal's Fit for 55 legislative package; and transposed into Irish law via The European Union (Planning and Development) (Renewable Energy) Regulations 2025 which aims to reduce net GHG emissions by at least 55% by 2030. The purpose being to update and strengthen the EU's renewable energy framework and accelerate energy transition by speeding up and simplifying renewable infrastructure permitting procedures and mandatory decision-making times. This Directive encourages the development of sustainable technologies and promotion of energy independence. The Proposed Development is a relevant solar energy development as per the Renewable Energy Directive III and will therefore support the objectives of the Directive.

6 Planning Assessment

The suite of documents that accompany the planning application are prepared cognisant of the relevant operational planning policy that apply to this application. This section of the Planning Support Statement summarises the conclusions of the environmental assessments.

The Proposed Development has evolved from the initial concept in response to emerging technical and environmental assessment findings to avoid or sensitively mitigate potential environmental effects through design.

6.1 Principle of Development

Sections 4 and 5 of this Planning Support Statement comprise a review of relevant legislation together, prevailing national, regional and local policy and further material considerations, all of which will inform a planning assessment.

Cognisant of the climate emergency and the drive for Net-Zero 2050, planning policy at all levels supports the increased development of renewable energy and further recognises the need for new approaches to address the intermittent and irregular supply of same.

The assessments of relevant environmental considerations as summarised below all confirm that the Proposed Development will not result in any unacceptable environmental impacts. In that context the Proposed Development can draw significant support from the policy previously summarised.

The site selection process undertaken for this project has sought to avoid all relevant statutory designations such as SACs or SPAs. Therefore, there are no such designations within the Application Site.

Accordingly, in land use terms, there are no zonings or statutory designations that would prohibit the potential to develop the site brought forward for use as a solar energy facility and the principle for the development is considered acceptable.

6.2 Ecology

The Offaly CDP sets out policies in respect of biodiversity to include a range of provisions to protect and conserve Natura 2000 sites, NHAs, pNHAs and protected species.

The site of the Proposed Development is not located within the boundary of any statutory or non-statutory designated sites of international, national or local nature conservation importance; however, there are a number of designated sites located within 10km of the Proposed Development.

The application is supported by a Report to Inform Screening for Appropriate Assessment and Natura Impact Statement and an Ecological Impact Assessment (EcIA) Report which is informed by consultation, a desk-based study and an Extended Phase I Habitat Survey assessing the potential impacts associated with the Proposed Development. As set out below, the assessment concludes that the Proposed Development will not give rise to any unacceptable ecological impacts.

6.2.1 Designated Sites

Having regard to the relevant legislative requirements and methodology outlined above, a Stage One Screening appraisal was completed to identify the likely significant effects of the proposed solar farm development on Raheenmore Bog SAC, River Shannon Callows SAC, Middle Shannon Callows SPA, Lough Derg, North-East Shore SAC and Lough Derg (Shannon) SPA.

Stage One Screening concluded that the Proposed Development is not directly connected with or necessary to the management of any European Site; or the above designated sites, even in absence of mitigation measures.

The Proposed Development was then assessed against other plans and projects and the possibility of likely significant Water Quality and Habitat Deterioration effects could not be excluded at the screening stage for the Proposed Development in combination with other projects. As such a Natura Impact Statement (NIS) was prepared containing a Stage 2 Appropriate Assessment appraisal of the implications of the Proposed Development on European sites in view of their conservation objectives, so as to enable the competent authorities to determine if the Proposed Development would adversely affect the integrity of any European site. A range of site-specific mitigation measures were recommended and it was determined that the measures proposed would avoid or reduce harmful effects of the Proposed Development on European Sites.

6.2.2 Habitats

The assessment of impacts upon identified habitats concludes that the predominant habitats located on site are arable crops and improved agricultural grassland which have a local (lower) ecological value. The site also features scrub, wet grassland/drainage ditches (dry) and tall ruderal/recolonising bare ground, of which have an ecological value ranging between local (lower) level to local (higher). Hedgerows and treelines are also present within the Proposed Development site which have a regional ecological value.

Pre-construction site clearance and construction works will result in a direct impact to habitats with the removal of c. 147m of hedgerow, underlying scrub and tall ruderal / recolonizing bare soil within the construction footprint. Operation of the Proposed Development will have **No Significant Effect** of habitats on site due to the nature and design of the proposal. The Proposed Development will have a **Significant Negative Effect** at a regional scale with the permanent loss (40 years) of short stretches of hedgerows and **Significant Negative Effect** at a local level with the permanent loss (40 years) of scrub, wet grassland / drainage ditches (dry), tall ruderal / recolonising bare ground and increased shading to large sections of existing arable crops and improved agricultural grassland.

The implementation of mitigation and enhancement measures will ensure **No Significant Effect** on habitats, with potential for an overall **Significantly Positive Effect** in the long term.

6.2.3 Bats

The assessment of impacts upon identified bat species concludes that the Proposed Development will have a Significant Negative Effect on bats with impacts from trimming on three trees identified as providing roosting

potential for a small number of individual bats. However, the Proposed Development will have **No Significant Effect** on bats in the long-term following the implementation of mitigation and compensation measures such as the 5 no. bat boxes proposed, as outlined in the EcIA.

6.2.4 Birds

The assessment of impacts upon identified bird species concludes that the Proposed Development has suitable habitat on site that provides nesting, roosting and foraging habitat for bird species. Pre-construction site clearance and construction works will require removal of small stretches of hedgerows, underlying scrub and tall ruderal / recolonizing bare soil. In the absence of mitigation, the Proposed Development will have a Significant Negative Effect on birds. However, the implementation of mitigation measures, including 5 no. proposed bird boxes, as set out in the EcIA will ensure the Proposed Development will have **No Significant Effect** on breeding birds.

6.2.5 Otter

The assessment of impacts upon identified Otter species concludes that there were no otter underground holts, above ground couches or evidence of otter recorded within the site or within 30m of the boundary of the site. However, there is potential for commuting otters to utilise the Kilmurry stream, bordering plantation woodlands and nearby bogs to the northeast. The Proposed Development will have **No Significant Effect** on otter.

6.2.6 Badger

The assessment of impacts upon identified Badger species concludes that there were no badger setts or evidence indicating the presence of badger recorded within the site or within 30m of the site of the Proposed Development.

6.2.7 Marsh Fritillary

The assessment of impacts upon identified Marsh Fritillary species concludes that it is highly unlikely that Marsh Fritillary are present on site and that the NBM Atlas NI (NBN Atlas Partnership 2021) identified no historical records of marsh fritillary butterfly or its food plant within 10km of the Proposed Development.

6.2.8 Ecology Conclusion

In addition to the proposed five bird and five bat boxes as outlined above, additional ecological enhancement measures are proposed such as the provision of two invertebrate hotels and one hibernacula with additional areas for a wildflower meadow – which will be enclosed by fencing to prevent grazing by sheep. From an ecological perspective a key benefit of the scheme is 52 new feathered trees, 643.7 linear meters of hedgerow planting, 2,512 m2 of screen planting and 4,731 m2 of wildflower meadow seeding proposed. Ultimately the Ecological Impact Assessment Report concludes that no residual effects are predicated to arise to any

ecological receptor as a result of the Proposed Development and no significant effects are expected on ecological receptors, individually or in combination with other plans or projects.

6.3 Screening for Appropriate Assessment

In accordance with the Habitats Directive on the Conservation of natural habitat and of wild fauna and flora, a screening for appropriate assessment was undertaken in line with Article 6(3) which defines a 2-tier procedure for consideration of plans and projects to assess the possibility of likely significant effects of the Proposed Development on European Sites conversation objectives.

The Proposed Development is not directly connected with or necessary to the management of any European Site. Water flows from the Application Site into the Kilmurry Stream located east of the site and the Derrygrogan Little Stream, located north of the site. This creates hydrological linkage to a tributary of the Silver River, which flows west into the Clodiagh (Tullamore) River, Brosna River and eventually into several European Sites downstream. In total, three SACs and two SPAs were considered, as these sites lie within the potential Zone of Influence and/or are hydrologically linked to the site.

The Stage 2 Appropriate Assessment appraisal considered that the competent authorities can conclude, based on best scientific knowledge, that there will be no adverse effects upon the integrity of any European site consequent upon the implementation mitigation measures prescribed in this NIS. Accordingly, the competent authorities can conclude, beyond reasonable scientific doubt, that the Proposed Development, whether considered alone or in combination with other plans and projects, will not adversely affect the integrity of any European site.

6.4 Cultural Heritage

The Offaly CDP sets out policies in respect of archaeological heritage alongside a range of legal instruments to protect architectural heritage.

There are no recorded archaeological sites within the Application Site. An inspection of the site did not identify any anomalies which could represent archaeological features.

There are no recorded archaeological sites within a 1km radius.

The Assessment that forms part of the planning application pack acknowledges that the site is set within an undeveloped parcel of agricultural land with the potential for previously unrecorded archaeological features and set within a wider landscape with other recorded sites.

An Archaeological Testing Report accompanies the application. The report details the findings of the archaeological test trenching and recommends mitigation measures to address potential impacts on the identified features on site.

6.5 Landscape and Visual

A Landscape and Visual Impact Assessment (LVIA) has been undertaken based on the relevant guidance described in the Guidelines for Landscape and Visual Impact Assessment, Third Edition (The Landscape

Institute and Institute of Environmental Management & Assessment, 2013) (GLVIA3) and the Technical Guidance Note 06/19 Visual Representation of Development Proposals (The Landscape Institute, 2019).

The purpose of this LVIA is to identify and determine the effects on landscape character, landscape features, visual receptors and visual amenity as a result of the works proposed as part of the construction and the future presence and operation of the Proposed Development.

The Proposed Development is located within an area of 'Low Landscape Sensitivity' according to the Offaly CDP which are classified as being robust landscapes which are tolerant to change.

In relation to trails and walking routes in proximity to the Proposed Development site it is noted that the Kilmurry Bog Walk & Nature Trail is located adjacent to a small portion of the northern boundary associated with the Proposed Development site, whilst the Ballycommon Greenway, forming part of the wider Grand Canal Greenway walking route is located approximately 1.6km south of the site at its closest point. The Grand Canal not only provides a navigational route, but its northern towpath forms the Grand Canal Greenway walking trial with a cycle route on the southern towpath. An offset of the trial known as the Kilbeggan Spur Walk runs along the towpath of the feeder canal by Campbell's Bridge, approximately 1 km to the southwest of Proposed Development site.

Cumulative effects with the consented (and recent amendment application) Ballyteige Solar Farm, Derrygrogan Big Solar Farm, Derries Solar Farm and the proposed Colehill Substation and grid connection development were also assessed. A suite of photomontages accompanies this planning application and considers cumulative developments. The LVIA concludes that there will be no adverse cumulative effects once proposed planting has become established.

Overall, the LVIA concludes that there will be no significant effect on the landscape from the construction, operation or decommissioning of the Proposed Development. The existing hedgerows surrounding the Proposed Development alongside the proposed screening mitigation measures will provide a high level of screening of the Proposed Development.

6.6 Glint and Glare

A Glint and Glare Assessment of the Proposed Development was undertaken to determine the potential solar reflection. As solar panels are fixed south facing and solar reflections at ground level towards the north are highly unlikely, a study area of 1km south, east and west of the Application Site has been applied.

Road receptors were screened out from the assessment as there are no national or regional roads within the study area. Any solar reflection from the Proposed Development that are experienced by a road user along a local road would be considered low impact in a worst-case scenario.

In total, 35 no. dwelling receptors were identified for assessment, with 18 no. dwellings identified as geometrically possible for solar reflection. Further analysis has confirmed that no dwelling receptor is likely to be affected by glint and glare impacts.

The potential for glint and glare effects upon aviation was assessed. This included an assessment upon Spollen's Airstrip, located c. 9km west of the Proposed Development. It was assessed that solar reflections

are geometrically possible at this receptor and it is expected to experience a low impact from the Proposed Development. There are no significant cumulative impacts predicted due to the distance between the Proposed Development and other permitted developments (>300m).

Overall, no significant impacts are predicted on surrounding dwellings, road safety and aviation activity and therefore no mitigation measures are recommended.

6.7 Hydrology and Flood Risk

A Flood Risk Assessment and Conceptual Drainage Strategy report accompanies the planning application for the Proposed Development. The Proposed Development site is located entirely within Flood Zone C, as defined in the OPW Guidelines, and the structures proposed as part of the development are classified as 'Water Compatible Development' and 'Essential Infrastructure', of which are considered appropriate development within Flood Zone C.

The Application Site has a low to moderate risk of surface water flooding. The proposed surface water drainage strategy will control surface water runoff from the transformer stations and associated areas of hardstanding which are placed adjacent to a deep gravel filled infiltration trench. Access tracks will be constructed of permeable Type 3 gravel to allow for surface water infiltration to ground. Solar panels will intercept rainfall, allowing rainwater to drip to the ground, or will be evaporated.

The report concludes that the Proposed Development would be safe, without increasing flood risk elsewhere, and that a positive reduction in flood risk would be achieved through the inclusion of onsite drainage features. Full details of the assessment are provided in the Flood Risk Assessment and Drainage Strategy.

6.8 Noise Impact

An Acoustic Impact Assessment (AIA) has been undertaken in respect of the Proposed Development to assess noise impacts during both construction and operation. The AIA is provided as part of the suite of planning application documents.

The noise assessment has appropriately considered and been informed by the following relevant policy and guidance documents:

- World Health Organisation (WHO) – Guidelines for Community Noise (1999);
- WHO (2009) Night Noise Guidelines for Europe;
- EPA Guidance Note for Noise Action Planning (NAP);
- British Standard BS4142:2014 Methods for Rating and Assessing Industrial and Commercial Sound (BS, 2014); and
- The British Standards Institution (February 2014) BS 5228-1:2009 + A1:2014 Code of Practice for Noise and Vibration Control on Construction and Open Sites – Part 1: Noise

The assessment considered the nearest noise sensitive receptors surrounding the site of the Proposed Development, which comprise 37 no. residential dwellings. The operational assessment was based on overall

sound power levels from string inverters and transformer stations. The assessment according represents a conservative scenario, and the actual noise levels would be expected to be less when the site is not operating at maximum capacity. The construction assessment considered a sound and vibration levels from a wide selection of plant typically utilised for the construction of solar farms. The assessment also included a cumulative assessment considering the consented Derrygrogan Big Solar Farm, Derries Solar and BESS facility, Ballyteige Solar Farm and the proposed amendments to Ballyteige Solar Farm which is soon to be submitted to Offaly County Council as an amendment planning application.

The assessment concluded that no impact is expected during day-time and night-time operation of the Proposed Development. Noise levels will not exceed the daytime and nighttime prescribed noise limits.

6.9 Access, Traffic and Transport

As set out in Section 3.11, the construction period is anticipated to last approximately 8 no. months. During this time, construction traffic will peak at a maximum of 20 no. movements per day, equating to 10 no. deliveries. Construction hours will be from 07:00 – 19:00 during weekdays and 0800 – 14:00 on Saturdays. Breaking down the number of deliveries across a standard 12-hour day equates to less than 1 no. delivery per hour. Whilst it is appreciated that deliveries will not be staggered in this manner, they will not arrive at the site in convoy either. Traffic management arrangements will be agreed with Offaly County Council in advance of construction commencing on site. It is anticipated that the submission of a Construction Traffic Management Plan will be a requirement of any consent for the proposal.

Construction workers will be encouraged to commute to site in shared work vehicles (hi-ace vans or similar), with parking facilitated at the temporary construction compound, the details of which will be agreed with the Planning Authority through a Construction Environmental Management Plan to be provided by the appointed contractor in advance of construction.

The Transport Statement including Outline Construction Traffic Management Plan confirms that Proposed Development components will be delivered to site using standard articulated lorries, and that the existing road network can accommodate these vehicles without need for upgrade. Access into the Proposed Development site is via a new site entrance off the Derrygrogan Little Road/L1023 local road

The Transport Statement including Outline Construction Traffic Management Plan concluded that the construction phase will not have a significant impact upon the surrounding highway network. The decommissioning phase will have a less onerous programme and impact than the construction phase. The operational phase will have an insignificant impact upon the surrounding road network. It is anticipated that during the operation phase the site will largely be unmanned and will generate approximately 5-10 vehicle trips per year for routine maintenance activities.

In summary, the Proposed Development will not result in any significant effects upon the road network during the construction, operation and decommissioning phases of the development.

6.10 Other Environmental Considerations

6.10.1 Outline Construction Environmental Management Plan

An outline Construction Environmental Management Plan (oCEMP) to outline best practice methods for managing the environmental impacts, including mitigation and monitoring, during construction, accompanies this planning application.

The proposed construction hours are Monday to Friday 07:00 to 19:00 inclusive and Saturday 08:00 to 14:00 inclusive. There are no works or traffic movements anticipated on Sundays or Bank holidays unless otherwise agreed. Construction deliveries will approach the site from the M6 motorway followed by the N52 national road.

HGV movements are expected to be most intense throughout the first few weeks of construction. Car/van movements are expected to be constant throughout the construction period and parking provision will be fully within the site. Temporary signage will highlight the entrance for construction traffic.

The oCEMP identifies best practice environmental mitigation and management techniques to ensure there are no significant impacts on the environment during the construction phase of the Proposed Development. Its purpose is to set out the mechanisms by which various construction activities would be managed to comply with the relevant environmental legislation and best practice to minimise the impacts and effects on human and environmental receptors.

The oCEMP is treated as a live document and is further developed to a CEMP as the detailed design stage progresses. The CEMP will be reviewed and updated on a regular basis where necessary. The CEMP would identify any further mitigation measures agreed with key stakeholders. The CEMP may also be revised depending on design modifications.

The submitted oCEMP contains details on matters including: roles and responsibilities; communications; pollution control and contingency plans; storage of materials; environmental performance management; programme of works; mitigation measures; environmental risk assessment; emergency response and environmental plan; and, site waste management plans.

7 Conclusion

The assessment of the Proposed Development supports the following conclusions:

- The Proposed Development is a relevant solar energy development as per the Renewable Energy Directive III and will therefore support the objectives of the Directive.
- Having reviewed the Proposed Development against Schedule 5 of the Planning and Development Regulations 2001, as amended, Tetra Tech RPS consider that the nature of the project is such that it is not a class of development as described for EIA purposes and EIA should not apply.
- As the Proposed Development does not fall within the provisions of Section 2(1) of the Electricity Regulation Act 1999, it is submitted that it does not fall within Section 182A(9) of the Act and an application under Section 182A(1) is not an appropriate consenting route. This position is supported by the Coimisiún case precedent.
- Cognisant of the climate emergency and the drive for Net-Zero 2050, planning policy at all levels supports the increased development of renewable energy and further recognises the need for new approaches to address the intermittent and irregular supply of same.
- The Proposed Development will support energy security and flexibility aiding the integration of renewables onto the network.
- The Proposed Development can draw significant support from planning legislation and policy.
- In land use terms, there are no zonings or statutory designations which would prohibit the potential to develop the site brought forward for use as a solar facility and the principle for the development is considered acceptable.
- The Proposed Development's strategic location, adjacent to the permitted Derrygrogan Big Solar Farm and in proximity to the proposed Colehill Substation and grid connection development, will facilitate a straightforward connection to the grid and will avoid the need for any significant infrastructure works or the potential for associated impacts.
- The planning application pack contains a suite of environmental assessments which demonstrate the Proposed Development will not result in any significant negative effects. This is in part due to the sensitive design approach that works with retaining field boundaries and landscape features.

Appendix 1

Developments Considered for Cumulative Assessment Mapped