

Forest Service Policy on the Granting of Felling Licences for Wind Farm Development

1. Only Limited Felling Licences (LFL) should be applied for and will be issued for wind farms – no General Felling Licences (GFL) will be granted. Two LFLs must be applied for – 1) to cover the turbine bases, the roads, buildings, etc; 2) to cover the area on which ‘turbulence felling’ will take place.

Turbulence felling is deemed to be felling in the vicinity of the turbines. The purpose of such felling is to avoid turbulence which can be created by the forest canopy and which can affect the performance and efficiency of the turbines. Turbulence felling may be allowed in certain cases, at the discretion of the Minister and subject to replanting requirements as outlined at (7) below.

2. In line with general Forest Service policy, where grant-aided forestry is to be used for wind farm development, any grants and premiums that were paid by the Forest Service in respect of the areas felled for the turbine bases, roads, and infrastructure must be refunded. (The refunding of grants applies to the areas licensed under LFL “1” above.)
3. The wind farm developer should, as part of the Environmental Impact Assessment (EIA), report on the potential loss of soil and biomass CO₂ and the reduction in productivity of the forest area associated with different wind farm/forestry management/landscape plans.

It is normal practice in cases of wind farm projects for the developer to carry out an environmental impact assessment as part of the planning permission process. EIA’s undertaken must include an assessment of the impact of any tree felling/replanting proposals on the site and the Forest Service should be consulted in this regard. The assessment should also address any environmental issues that may arise because of the level of felling/replanting operations proposed such as stability of the site, danger to water quality, landscape issues, danger to habitats, etc.

4. A copy of the full planning permission granted by the local authority or Bord Pleanála for the development should be submitted with the felling licence application(s).

5. As standard, areas cleared for turbine bases, access roads, and any other wind farm related uses must be replaced by replanting at an alternative site. The felling licence applicant must own the alternative site at the time the licence is granted.
6. If turbulence felling is necessary it should be kept to the absolute minimum required.
7. Where turbulence felling is necessary, a 'short rotation forestry' (SRF) approach will be made a condition of the LFL. SRF is where premature clearfell is allowed with replanting in the form of SRF, which should use lodgepole pine or another suitable species as the replanting choice, with clearfell again once the crop is 10 metres high. The height of 10 metres is a guideline; the height is selected on turbine manufacturers specification and loss of turbine efficiency.
8. In light of the consideration that the effect on the forest estate should be kept to a minimum, and the principal of retaining healthy and permanent forest, the Forest Service requires the establishment of an area that will provide the same wood production and 'climate change benefit' over the long term plus an additional 10% to allow for the increase in soil carbon emissions at afforestation and the loss of potential carbon sequestration due to the proposed method of forest management.

To this end, the requirement will be for replanting on a hectare for hectare basis for the footprint of the turbines and the other infrastructure developments. In the case of the area to undergo turbulence felling, the requirement will be for replanting on a hectare for hectare basis plus an additional 10% to allow for the increase in soil carbon emissions at afforestation and the loss of potential carbon sequestration due to the proposed method of forest management.

For example, in the case of a 200 ha plantation, where say 15 ha will be for turbine placement, other buildings and roads, etc., and 100 ha will undergo turbulence felling, the requirement would be:

- replanting on 15 ha for the turbines, etc.;
- replanting on 100 ha for turbulence felling;
- replanting on 10 ha (10% of 100) for soil carbon emissions at afforestation and the loss of potential carbon sequestration due to the proposed method of forest management.

Total replanting in this example = 125 ha, with 100 being on the site of the turbulence felling; and the 25 ha balance being on alternative land owned by the licence applicant at the time the licence is granted.

9. In exceptional circumstances a contribution condition can be imposed on a felling licence instead of a replanting condition. Where, for any reason, a contribution condition is imposed, the cost of the contribution condition should be calculated on the area as calculated at policy item 7 above. That is to say, the area on which the calculation is based will contain an additional 10% of the turbulence felling area.

By way of an indication, the contribution amount will equal the cost of acquiring good quality planting land (i.e. at the upper levels of current market prices); the cost of the replacement trees; the planting operation cost; fencing costs; and a 10-year maintenance cost. An additional 10% of the total cost of the aforementioned to cover administration costs, etc. if grants and premiums were paid in respect of the land in question.

If an area is to be licensed for turbulence felling, there will be an additional 10% added to the cost calculated above to allow for the increase in soil carbon emissions at afforestation and the loss of potential carbon sequestration due to the proposed method of forest management, as under item 8 above.