

Information Report on the Approval of the Local Plan Amending the Rūjiena Municipality Spatial Plan for 2012–2024 for the "Lode" Wind Farm in Lode Parish, Valmiera Municipality, and the Issuance of Binding Regulations

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| The information report has been prepared in accordance with Paragraph 27 of Cabinet Regulation No. 157 of 23 March 2004, "Procedures for Strategic Environmental Assessment". | |
| Planning Document: | Local Plan amending the Rūjiena Municipality Spatial Plan for 2012–2024 for the "Lode" Wind Farm in Lode Parish, Valmiera Municipality. |
| Decision of the State Environmental Bureau: | Decision No. 4-02/91/2023 of 4 December 2023 "On the Application of the Strategic Environmental Assessment Procedure to the Local Plan for the 'Lode' Wind Farm in the Territory of Lode Parish, Valmiera Municipality". |
| Opinion of the Energy and Environmental Agency: | Opinion No. 10.3/1/2025 of 26 February 2025 "On Amendments to the Spatial Plan for the Local Plan of the 'Lode' Wind Farm in Lode Parish, Valmiera Municipality, and the Environmental Report". |
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On 24 April 2025, the Valmiera Municipality Council adopted Decision No. 208 (Minutes No. 6, Section 3) "On the Approval of the Local Plan Amending the Rūjiena Municipality Spatial Plan for 2012–2024 for the 'Lode' Wind Farm in Lode Parish, Valmiera Municipality" and issued Binding Regulations No. 150 "Local Plan Amending the Rūjiena Municipality Spatial Plan for 2012–2024 for the 'Lode' Wind Farm in Lode Parish, Valmiera Municipality: Land Use and Building Regulations and Graphic Section."

The Local Plan for the "Lode" Wind Farm in Valmiera Municipality (hereinafter – the Local Plan) is a long-term planning document. The Local Plan establishes the prerequisites for the development of the "Lode" Wind Farm. According to the development proposal, up to 19 high-capacity next-generation wind turbines (WTs) may be constructed within the "Lode" Wind Farm, with the nominal capacity of a single WT potentially exceeding 6 MW.

The solutions set out in the Local Plan have been developed in accordance with the task assigned by the Valmiera Municipality Council for the preparation of the Local Plan, based on the conditions and opinions provided by the institutions involved in the planning process, as well as in compliance with the Environmental Impact Assessment (EIA) report prepared for the proposed activity.

The objective of developing the Local Plan is to amend the functional zoning specified in the current Rūjiena Municipality Spatial Plan by establishing:

- a sub-zone within the "Agricultural Areas" (L) functional zone where construction by energy supply companies (14006) – including wind turbines and wind farms – and technical

infrastructure (14001) is permitted for land parcels currently designated as “Agricultural Areas” (L);

- a sub-zone within the “Forest Areas” (M) functional zone where construction by energy supply companies (14006) – including wind turbines and wind farms – and technical infrastructure (14001) is permitted for land parcels currently designated as “Forest Areas” (M).

In accordance with the applicable regulatory requirements and the decision of the State Environmental Bureau No. 4-02/91/2023 of 4 December 2023 on the application of the strategic environmental assessment procedure to the Local Plan for the “Lode” Wind Farm in the territory of Lode Parish, Valmiera Municipality, a strategic environmental assessment has been carried out for the Local Plan. As part of the assessment, an Environmental Report was prepared, and a public consultation was conducted concurrently with the public display of the draft Local Plan.

On 26 February 2025, the Energy and Environmental Agency issued Opinion No. 10.3/1/2025 “On Amendments to the Spatial Plan for the Local Plan of the ‘Lode’ Wind Farm in Lode Parish, Valmiera Municipality, and the Environmental Report.”

Integration of Environmental Considerations into the Planning Document

To integrate environmental considerations into the solutions proposed in the Local Plan, these solutions are based on the results of the environmental impact assessment of the significant effects of the “Lode” Wind Farm. As the territorial development planning process (i.e., the preparation of the Local Plan) and the environmental impact assessment process were carried out in parallel, detailed research data on all environmental aspects of the proposed activity, its potential impacts, affected areas, and possible mitigation or prevention measures were obtained for the purposes of the Local Plan development. The solutions of the Local Plan have been developed considering the following key territorial studies:

- Study of noise impact
- Study of plant species (vascular plants) and habitats (forests, wetlands)
- Study of flicker effect impact
- Study of bat population
- Assessment of air quality
- Study of ornithofauna
- Assessment of climate impact
- Assessment of landscape and visual impact
- Study of vibration impact
- Assessment of cultural and historical values
- Study of electromagnetic radiation
- Assessment of environmental risks and emergency situations

In Section 3.5 of the Local Planning Area and Land Use Regulations (hereinafter referred to as TIAN), under “Requirements for Environmental Risk Reduction,” Item 11 specifies that environmental risk reduction measures are to be implemented in accordance with the Environmental Monitoring State Bureau's opinion on the Environmental Impact Assessment report titled “Construction of the Wind Power Plant Park ‘Lode’ in the Lode and Ipiķi Parishes of Valmiera Municipality,” which outlines the requirements regarding the location, scope, and type of technology for the proposed activity, as well as the prevention, reduction, and monitoring of impacts.

The integration of the Environmental Review, institutional opinions, and public consultation results into planning documents

The preparation of the Strategic Environmental Impact Assessment (SEA) Environmental Review for the Local Planning Document was conducted concurrently with the preparation of the Local Planning Document and the draft of the Environmental Impact Assessment report for public consultation. Therefore, during the territorial development planning process, based on the data and conclusions of the Environmental Impact Assessment, the potential environmental impact of the Local Planning Document was evaluated, and the necessary measures to reduce negative impacts were incorporated into the solutions of the Local Planning Document, including the requirements of the TIAN.

Environmental Institutions' Feedback on the Environmental Review Project

The Vidzeme Regional Administration of the Nature Conservation Agency, in its opinion, stated the following:

- 1) The mitigation measures defined in the certified bird expert's opinion are only partially reflected in the Local Planning Document (TIAN). The implementation of the Local Planning Document is acceptable if all the mandatory mitigation measures included in the Environmental Impact Assessment (EIA) report, aimed at reducing impacts on ornithofauna, are incorporated into the TIAN requirements. Currently, there is no requirement for the placement of appropriate bird boxes for the woodcock and Ural owl, which would help mitigate the expected negative impact of the proposed activity.

The developers of the Local Planning Document have clarified that Point 11 of the TIAN already includes the implementation of environmental risk reduction measures in accordance with the Environmental Monitoring State Bureau's opinion on the EIA report for the "Construction of the Wind Power Plant Park 'Lode' in the Lode and Ipiķi Parishes of Valmiera Municipality," regarding the location, scope, and type of technology for the proposed activity, as well as the prevention, reduction, and monitoring of impacts. At the time of preparing the Local Planning Document, the Energy and Environment Agency (EVA) had not yet provided its opinion on the EIA Report, therefore, the specific requirements were not known. There is no reason to believe that any of the mandatory requirements mentioned in the EVA's opinion will not be fulfilled if they are not specified in the TIAN.

- 2) The Administration indicated that, like the case with bats, the TIAN should include the expert's requirement for bird monitoring, which must begin before the construction phase of the proposed activities, continuing to collect and supplement the data obtained during the expert's opinion. The planner of the proposed activity must consider that the information obtained through monitoring may lead to the need to introduce operational restrictions on the wind power plant, such as halting operations during bird migration periods or applying other mitigation technological solutions.
- 3) The developers of the Local Planning Document have clarified that this point is addressed in Item 1 of their comments.
- 4) According to available information, the EIA procedure for the construction of the "Lode" Wind Power Plant Park in Lode and Ipiķi Parishes of Valmiera Municipality has not been completed, and the Environmental Monitoring State Bureau (VPVB) has not yet provided an opinion on the EIA report. The VPVB's opinion is required as a timely assessment, without which it is not possible to properly align the proposed activity with environmental and nature protection requirements. The Administration states that the Local Planning Document should be prepared considering the

results of the EIA or the VPVB's opinion on the EIA report. It is not possible to evaluate the environmental impact and acceptability of the wind power plant construction and operation, nor whether the planned locations for the wind power plant construction are in compliance with environmental requirements in the Local Planning Document until the EIA is completed.

- 5) The developers of the Local Planning Document have clarified that this point is addressed in Item 1 of their comments.

The State Environmental Service (SES) Permits Department indicated that the conditions for the development of the Local Planning Document set by the State Environmental Service have been met.

The Health Inspectorate, in its opinion, noted that the project solutions comply with hygiene requirements. It recommended that the wind power plant's predicted noise level be tested through practical measurements during the further design process. After the construction of the wind power plant, accredited laboratories should perform instrumental noise measurements in the impact zone of the wind power plant, where the nearest residential buildings (farmhouses) are located. If the noise level exceeds permissible limits, noise mitigation measures should be implemented.

This proposal applies to the subsequent design and construction process.

Public Consultation Results

The public consultation for the Environmental Review took place from August 12, 2024, to September 10, 2024. The public meeting was held on August 26, 2024, at 17:00 via an online video conference on the Google Meet platform. The meeting was attended by several participants, including representatives from the municipality, the Local Planning Document developers, and the wind park developers. Answers were provided to interested parties regarding the planned wind park. No objections were raised to the Local Planning Document or the Environmental Review.

During the public consultation, opportunities were provided for written suggestions and feedback on the Local Planning Document and the Environmental Review.

A total of three submissions were received during the consultation period. Two of the submissions requested additional independent expertise on the impact of the planned wind park and economic justification for the feasibility of constructing the wind park. The submissions did not contain objections or suggestions related to the Local Planning Document or the Environmental Review.

One of the submissions included several collective petitions that were prepared and signed before the start of the Local Planning Document and Environmental Review consultation. These petitions were submitted during the consultation on the EIA Report, so their content is not relevant to the Local Planning Document or Environmental Review.

Cross-Border Consultations

In its decision dated December 4, 2023 (Nr. 4-02/91/2023), the State Environmental Bureau of Latvia pointed out that the Local Planning area is located within a 15 km zone from the shared border of the Republic of Latvia and the Republic of Estonia. The goal of developing the Local Plan lays the groundwork for the construction of a wind park, which falls under the scope of Appendix 1, Article 22 of the Convention on Environmental Impact Assessment in a Cross-Border Context. According to this, the development of the Local Plan must also take into account the Cabinet of Ministers' Order No. 38 from January 22, 1997, "Agreement between the Government of the Republic of Latvia and the Government of the Republic of Estonia on Environmental Impact Assessment in a Cross-Border Context."

As a result, after preparing the first draft of the Local Plan and Environmental Review, SIA "METRUM" sent the Environmental Review translations in Estonian and English to the State Environmental Bureau of Latvia for further forwarding to the Estonian Ministry of Climate.

On August 23, 2024, the State Environmental Bureau sent the documents to the Estonian Ministry of Climate, requesting comments by October 26, 2024, regarding their participation in the strategic environmental impact assessment of the planning document and cross-border impact evaluation, as well as any feedback received during the public consultation on the Environmental Review.

On October 28, 2024, the State Environmental Bureau forwarded the comments from the Estonian Ministry of Climate, as well as feedback from Estonian environmental and health institutions and local governments regarding the Local Plan's Environmental Review and cross-border impact assessment, to SIA "METRUM."

The governments of Estonia and Latvia agreed to organize a joint remote public consultation meeting on the cross-border environmental impact assessment and strategic environmental impact assessment on November 19, 2024.

Representatives from the Estonian Ministry of Climate, local municipalities, communities, the wind park developer SIA "Utilitas," environmental impact assessment developer SIA "Estonian, Latvian & Lithuanian Environment," the Local Plan and Environmental Review developer SIA "METRUM," and the State Environmental Bureau participated in the remote meeting. The participants were presented with information on the planned wind park development, key findings from the environmental impact assessment, and strategic environmental impact assessment. Attendees were given the opportunity to ask questions and receive responses.

On December 18, 2024, SIA "METRUM" sent a letter to the State Environmental Bureau containing summarized comments from the Estonian Ministry of Climate, Estonian environmental and health institutions, and local municipalities regarding the Local Plan's Environmental Review and cross-border impact assessment. On December 19, 2024, the State Environmental Bureau forwarded the documents to the Estonian Ministry of Climate.

In a letter dated January 10, 2025 (Nr.6-3/23/4047-28), the Estonian Ministry of Climate confirmed that it had reviewed the protocol from the November 19, 2024, remote meeting regarding the "Lodes" wind park project's public consultation on environmental impact assessment and strategic environmental impact assessment. The Ministry also noted that the responses to questions from local residents on the Estonian side of the border, as well as comments provided during the EIA and SIA procedures, had been forwarded to the relevant authorities and interested parties, including residents whose concerns about the "Lodes" wind park project had been addressed.

After reviewing the documents, the Estonian Ministry of Climate confirmed that it had no further comments or suggestions concerning the protocol or responses to the comments.

Energy and Environmental Agency Opinion

On February 26, 2025, the Energy and Environmental Agency issued Opinion No. 10.3/1/2025 regarding the Local Plan's amendments for the "Lode" wind park in Lode parish, Valmiera municipality, and the associated Environmental Review. The Agency pointed out that the Environmental Review must be supplemented, considering the conclusions and recommendations made in sections 1.12, 3.7 (with subsections), and section 6 of the opinion.

Before the Local Plan is approved by the Valmiera municipality, the recommendations in the Energy and Environmental Agency's Opinion from February 26, 2025, have been reviewed, and the following solutions have been adopted for their implementation:

1. The 7.1 section of the Environmental Review, titled "Planning Document and Included Solutions," has been expanded to provide a more detailed description of the objectives and solutions of the Local Plan.
2. The 11th section of the Environmental Review has been supplemented with specific measures for monitoring the implementation of the planning document and relevant indicators.

These steps are taken to address the recommendations of the Energy and Environmental Agency, ensuring the completeness and compliance of the Local Plan and Environmental Review.

Justification for the Approved Planning Document

The current Rūjiena Municipality Territorial Plan for 2012–2024 designates functional zones for the Local Plan area as follows: "Agricultural Territory" (L) and "Forest Territory" (M). Water bodies within the Local Plan area are included under the "Water Territory" (U) functional zone.

According to section 25.1.4 of the Rūjiena municipality's Territorial Use and Construction Regulations, wind power stations with a capacity exceeding 20 kW are allowed to be in "Production and Technical Facility Zones" (R). When preparing the local plan, wind power stations are also permitted in "Agricultural Territories" (L). However, construction of wind power stations **is not** allowed in "Forest Territories" (M).

The proposed functional zones for the Local Plan area have been determined in accordance with the task instructions for the preparation of the Local Plan and the Cabinet of Ministers Regulations No. 240 dated 30.04.2013, which establish the classification of functional zones. The proposal ensures that land use types are aligned with the regulations and the specific nature of the area.

The following functional subzones have been designated for the Local Plan area:

- Agricultural Territory (L1): Assigned to land plots or parts thereof where the existing territorial plan designates the functional zone as "Agricultural Territory" (L).
- Forest Territory (M1): Assigned to land plots or parts thereof where the existing territorial plan designates the functional zone as "Forest Territory" (M).
- Transport Infrastructure Territory (TR1): Assigned to existing transport infrastructure objects within the Local Plan area.
- Water Territory (Ū1): Assigned to existing water bodies within the Local Plan area.

During the Environmental Impact Assessment (EIA) process, both the proposed location for activities, namely the site for the wind power plant - and the alternatives for technical solution - such as the different wind turbine models - were evaluated.

Two Alternatives Considered in the Local Plan Development Process

During the development of the Local Plan, two alternatives were considered from the perspective of territorial development planning:

1. First Alternative – The functional subzones where wind power stations are allowed would be defined only for land plot areas where the construction of wind power stations is planned, as outlined in the Environmental Impact Assessment (EIA) Report.

2. Second Alternative – The functional subzones “Agricultural Territory” (L1) and “Forest Territory” (M1), where the construction of wind power stations and wind farms is allowed, would be defined for all land plots designated as “Agricultural Territory” (L) and “Forest Territory” (M) in the existing territorial plan.

The second alternative is flexible and adaptable to changing circumstances. During the building design phase, more detailed studies will be conducted, and the most suitable location for the wind power station will be determined within the boundaries of the specific land plot. If unforeseen impacts arise, not considered during the preparation of the EIA Report, the potential impacts will be assessed within the framework of the initial environmental impact assessment, considering the extent of changes and the placement of different wind power stations or associated infrastructure.

The second alternative was selected for the Local Plan. Defining the functional subzones for the entire land plot, where wind power stations are planned, rather than just specific portions of it, is a pragmatic and reasonable solution. It increases the feasibility and efficiency of the project’s implementation. The EIA Report does not indicate that any part of a land plot requires maintaining the existing zoning without modifying the functional zone.

Measures for Monitoring the Implementation of Planning Documents

In accordance with the Energy and Environment Agency's opinion dated February 26, 2025, No. 10.3/1/2025 "On the Local Plan Amendments for the Wind Farm 'Lode' in Lode Parish, Valmiera Municipality, Environmental Report," to assess the direct or indirect environmental impact of the implementation of the Local Plan, the Valmiera Municipality is required to prepare a monitoring report at least once during the planning period (in 2030). This report must be submitted to the Energy and Environment Agency both in paper and electronic formats.