From:	Francesca Rowson
To:	SIDS
Cc:	Mike Amiel Mekell
Subject:	260172: ACP case ref: 314186 - Killoshulan wind farm - Close Out Request
Date:	Wednesday 30 September 2026 18:26:16
Attachments:	image001.png 260172 Killoshulan WF - SID Close-Out Request - 2026.09.30 F2 R.pdf

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An Coimisiún Pleanála,

MKO, on behalf of our Client, Killoshulan Renewable Energy Limited ('the Applicant'), wish to formally request to close out pre-planning consultation with An Coimisiún Pleanála in respect to a proposed renewable energy development comprising of a Proposed Wind Farm and Proposed Grid Connection works ('the Proposed Project'), located at Killoshulan and adjacent townlands, County Kilkenny. In support of this request, please see the attached Cover Letter (including appendices no. 1-5).

As discussed during the third pre-application consultation meeting with the Commission, it is the Applicant's intention to submit the planning application to the Commission before the 1st of November 2026, prior to the commencement of mandatory Environmental Impact Assessment scoping under Renewable Energy Directive III. Given the urgent need for renewable energy development to meet national targets, we respectfully request the Commission to expedite this request as a matter of urgency.

We trust that this request above is in order and look forward to receiving the Commission's determination of this case as soon as possible.

Should you require any further information please do not hesitate to get in touch.

Kind regards,
Francesca.

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An Coimisiún Pleanála
Strategic Infrastructure Development
64 Marlborough Street
Dublin 1
D01 V902

Our ref: 260172

Your ref: PC10.314186

Date: 30th September 2026

Re: Formal request for An Coimisiún Pleanála to issue a Strategic Infrastructure Development Determination in relation to a Proposed Renewable Energy Development comprising of a Proposed Wind Farm and Proposed Grid Connection located in Killoshulan and adjacent townlands, County Kilkenny.

To whom it may concern,

I refer to the Strategic Infrastructure Development ('SID') pre-application consultation process in relation to the proposed renewable energy development comprising of a Proposed Wind Farm and Proposed Grid Connection ('the Proposed Project'), located in Killoshulan and adjacent townlands, County Kilkenny. A Site Location Map of the Proposed Project is enclosed with this letter in Appendix 1.

In light of the comprehensive studies that have been carried out and the discussions that have taken place with the Commission and other stakeholders to date in relation to the Proposed Project, MKO, on behalf of our Client, Killoshulan Renewable Energy Limited ('the Applicant'), a subsidiary of Atlantic Infrastructure Renewables (AIR) of 5 Pery Square, Limerick, wish to formally close the pre-application consultation process and requests that the Commission issue a notice containing its SID determination under the provisions of Section 37B(4) of the Planning and Development Act, 2000 (as amended) ('the Planning Act') in relation to this case.

Proposed Project

The forthcoming planning application for the Proposed Project, which the Applicant intends to submit to the Commission will seek permission for a 10no. turbine wind farm, an onsite 110kV electrical substation, Battery Energy Storage System (BESS), associated grid connection and all associated site development works and ancillary infrastructure above and below ground.

Each of the proposed wind turbines will have an estimated generating capacity of approximately 6.2MW, which would result in an estimated installed capacity of approximately 62MW, above the 50MW threshold as set out on the 7th Schedule of the Planning Act. These proposals were outlined and discussed with the Commission during the pre-application consultation process.

The main elements of the Proposed Project are summarised below and in the Site Layout Plan enclosed with this letter in Appendix 2. A Proposed Wind Farm Layout Plan and a Proposed Grid Connection Layout Plan are enclosed with this letter in Appendix 3 and Appendix 4, respectively.

- The construction of 10 no. wind turbines with an overall turbine tip height of 185 metres; a rotor blade diameter of 163 metres; and hub height of 103.5 metres, and associated foundations and hard standing areas;
    - Subsequent decommissioning of the wind turbines, following a thirty five-year operational life from the date of full commissioning of the wind turbines;

- A permanent 110kV substation compound (2 no. control buildings with welfare facilities, all associated electrical plant and equipment, security fencing, entrance on to existing track, all associated underground cabling, wastewater holding tank, site drainage and all ancillary works);
- Underground internal wind farm electrical cabling and communications cabling connecting the wind turbines to the proposed on-site 110kV electrical substation and associated ancillary works;
    - Subsequent decommissioning of all underground internal wind farm electrical cabling and communications cabling connecting the wind turbines to the proposed on-site 110kV electrical substation following a thirty-five-year operational life from the date of full commissioning of the wind turbines;
- A meteorological mast of 103.5m in height, and associated foundation and hard-standing area;
    - Subsequent decommissioning of the meteorological mast, following a thirty five-year operational life from the date of full commissioning of the wind turbines;
- All works associated with the upgrade of the existing agricultural access off the R693 regional road (including the installation of fencing and steel gates) to serve as the main site entrance for the wind farm;
- The provision of 1 no. new access point along the R693 regional road;
- Upgrade of existing tracks/ roads and junctions and provision of new site access roads and junctions;
- 2 no. temporary construction compounds with temporary offices and staff welfare facilities;
- Accommodation works along the public road network in the townlands of Urlingford, Mountfinn, Balief Lower, Balief Upper and Barna, Co. Kilkenny to facilitate the delivery of turbine components and other abnormal loads;
- 1 no. Borrow Pit;
- Spoil Management;
- Site Drainage;
- Tree Felling and hedgerow removal;
- Biodiversity Management and Enhancement Measures;
- Operational stage site signage;
- Battery Energy Storage System and all associated electrical plant and equipment, security fencing, 2 no. static water storage tanks and a firewater retention tank, and all associated infrastructure and apparatus;
- The provision of approximately 12km of underground electrical (110kV) and communications cabling from the proposed on-site 110kV electrical substation to the western boundary of the River Nore to facilitate a future connection to the national grid via the existing Ballyragget 110kV electrical substation;
- Provision of approximately 18 no. joint bays, communication chambers and earth sheath links along the proposed underground electrical cabling route;
- Reinstatement of land, road and track surface above the proposed cabling trench; and
- All related site works and ancillary development considered necessary to facilitate the Proposed Project, including landscaping and the reinstatement of land.

Pre-Application Consultation Review

The first, second and third pre-application consultation meetings with the Commission took place on 13th October 2022, 22nd June 2026 and 15th September 2026 respectively, via Microsoft Teams. Meeting records were prepared by the Commission for each meeting and include the details of the discussions that took place. Across the three meetings, the Applicant outlined the view that the Proposed Project qualifies as SID under Section 37B of the Act. The Commission's representatives indicated a similar view during the discussion, although they noted that the final SID determination ultimately rests with the Commission. Additionally, pre-application meetings were held with Kilkenny County Council (KCC) on the 7th of September 2022 and the 17th of June 2026, both via Microsoft Teams. It should also be noted that a meeting was held with the National Parks and Wildlife Service on the 9th of June 2026, in relation to the Proposed Project.

Contents of the Planning Application

For clarity, it is intended to include the following documentation with the forthcoming planning application for the Proposed Project:

- Planning Application Documents:
  - Required statutory planning application forms, notices and letters of consent
- Planning Application Drawings
- Planning Report
- Environmental Impact Assessment Report ('EIAR') – assessing the following relevant criteria:
  - Consideration of Reasonable Alternatives
  - Population and Human Health (including Shadow Flicker)
  - Biodiversity
  - Ornithology
  - Land, Soils and Geology
  - Hydrology and Hydrogeology
  - Air Quality
  - Climate
  - Noise and Vibration
  - Landscape and Visual
  - Cultural Heritage
  - Material Assets
  - Vulnerability of the Proposed Project to Major Accidents and Natural Disasters
  - Interaction of the Foregoing
  - An assessment of any potential cumulative effects
- Natura Impact Statement ('NIS')

Renewable Energy Directive III – Completeness Check

Section 37JA of the Planning Act provides that for relevant planning applications made under Section 37E, the competent authority shall acknowledge the completeness of the planning application within 45 days. Please find a completeness check table enclosed with this letter in Appendix 5 to assist the Commission in issuing their schedule of information to inform the completeness check as part of the SID determination. For information purposes, an additional 'Note' column has been added to the completeness check table to provide additional context to the Commission. It is MKO's view that the planning application, once submitted, will satisfy the completeness check.

SID Determination Criteria

In order to be considered as SID, the project must exceed the thresholds established in the 7th Schedule of the Planning Act and also satisfy one or more of the three criteria set out in Section 37A(2). The relevant SID threshold established in the 7th schedule of the Planning Act for the current Proposed Project is:

> "*An installation for the harnessing of wind power for energy production (a wind farm) with more than 25 turbines or having a total output greater than 50MW*".

The Proposed Wind Farm will have 10 no. turbines, each with an estimated generating capacity of approximately 6.2MW, which would result in an estimated installed capacity of approximately 62MW, above the 50MW threshold as set out on the 7th Schedule of the Planning Act.

Under Section 37A(2) of the Planning Act the project must satisfy one or more of the following criteria:

a) The development would be of strategic economic or social importance to the State or the region in which it would be situate,

b) The development would contribute substantially to the fulfilment of any of the objectives in the National Planning Framework or in any regional spatial and economic strategy in force in respect of the area or area in which it would be situate,

c) The development would have a significant effect on the area of more than one planning authority.

The consideration of the Proposed Project in the context of these criteria is set out below:

a) **The development would be of strategic economic or social importance to the State or the region in which it would be situate**

Due to the scale of the Proposed Project, with an installed capacity in excess of 50MW of renewable energy, it is considered to be wholly of a strategic nature and of strategic economic and social importance to the region and state. The capital investment required for the construction of a project of the scale proposed, when combined with the commercial rates, contributions and community gain proposals associated with the operation of the Proposed Project, will cumulatively represent a significant economic contribution to the region if not the country as a whole. As a renewable energy proposal, the Proposed Project will assist in meeting national renewable energy targets and will also result in significant reductions in carbon emissions from electricity generation and reduce the country's reliance on imported fossil fuels.

b) **The development would contribute substantially to the fulfilment of any of the objectives in the National Planning Framework or in any regional spatial and economic strategy in force in respect of the area or area in which it would be situate,**

The Proposed Project will contribute to the fulfilment of the transition to a low carbon and climate resilient society strategic outcome (National Strategic Outcome 8) of the National Planning Framework First Revision (Revised NPF), which states that:

> *"New energy systems and transmission grids will be necessary for a more distributed, renewables-focused energy generating system, harnessing both the considerable on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy to the major sources of demand."*

As part of this National Strategic Outcome the following targets are noted in relation to Green Energy:

> *"Deliver 80% of our electricity needs from renewable sources by 2030 with a strategic aim to increase renewable deployment in line with EU targets and National policy objectives out to 2030 and beyond. It is expected that this increase in renewable deployment will lead to a greater diversity of renewable technologies in the mix."*

The Proposed Project is also in accordance with and will contribute to the fulfilment of the following National Policy Objectives:

> **National Policy Objective 70:** *Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a climate neutral economy by 2050.*
>
> **National Policy Objective 74:** *Each Regional Assembly must plan, through their Regional Spatial and Economic Strategy, for the delivery of the regional renewable electricity capacity allocations indicated for onshore wind and solar ..., and identify allocations for each of the local authorities, based on the best available scientific evidence and in accordance with legislative requirements, in order to meet the overall national target.*

The Proposed Project will contribute to the fulfilment of the objectives in the Revised NPF, in particular National Strategic Outcome 8. The Proposed Project will also contribute to the additional capacity allocation of 978MW for onshore wind allocated to the Southern Region, in which the Proposed Project is located, as set out under National Policy Objective 74.

For the Southern Region in particular, the Revised NPF states the following as a '*Key future planning and development and place-making policy*':

> *"Harnessing the potential of the region in renewable energy terms in accordance with the capacity allocation targets set out in Chapter 9: Climate Transition and Our Environment,*

across the technological spectrum from wind and solar, in addition to biomass and wave energy."

The Proposed Project will also contribute to the fulfilment of the objectives of the Regional Spatial & Economic Strategy (RSES) for the Southern Region, which include:

RPO 99 (Renewable Wind Energy): It is an objective to support the sustainable development of renewable wind energy (on shore and offshore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.

RPO 100 (Indigenous Renewable Energy Production and Grid Injection): *It is an objective to support the integration of indigenous renewable energy production and grid injection.*

c) **The development would have a significant effect on the area of more than one planning authority.**

The third criterion set out in section 37A(2) of the Planning Act, that the development would have a "significant effect" on the area of more than one Planning Authority is not considered relevant in the context of the current proposal as the Proposed Wind Farm and Proposed Grid Connection infrastructure are both located entirely within the functional area of KCC.

As the Proposed Project exceeds the relevant thresholds set out in the 7th Schedule and satisfies criteria set out in section 37A(2) of the Planning Act it is contended that the project does constitute SID, as such we look forward to the SID determination of the Commission in this regard.

As discussed during the third pre-application consultation meeting with the Commission, it is the Applicant's intention to submit the planning application to the Commission before the 1st of November 2026, prior to the commencement of mandatory Environmental Impact Assessment scoping under Renewable Energy Directive III. Given the urgent need for renewable energy development to meet national targets, we respectfully request the Commission to expedite this request as a matter of urgency.

We trust the above is in order and look forward to receiving the Commission's determination of this case as soon as possible.

Yours sincerely,

Francesca Rowson

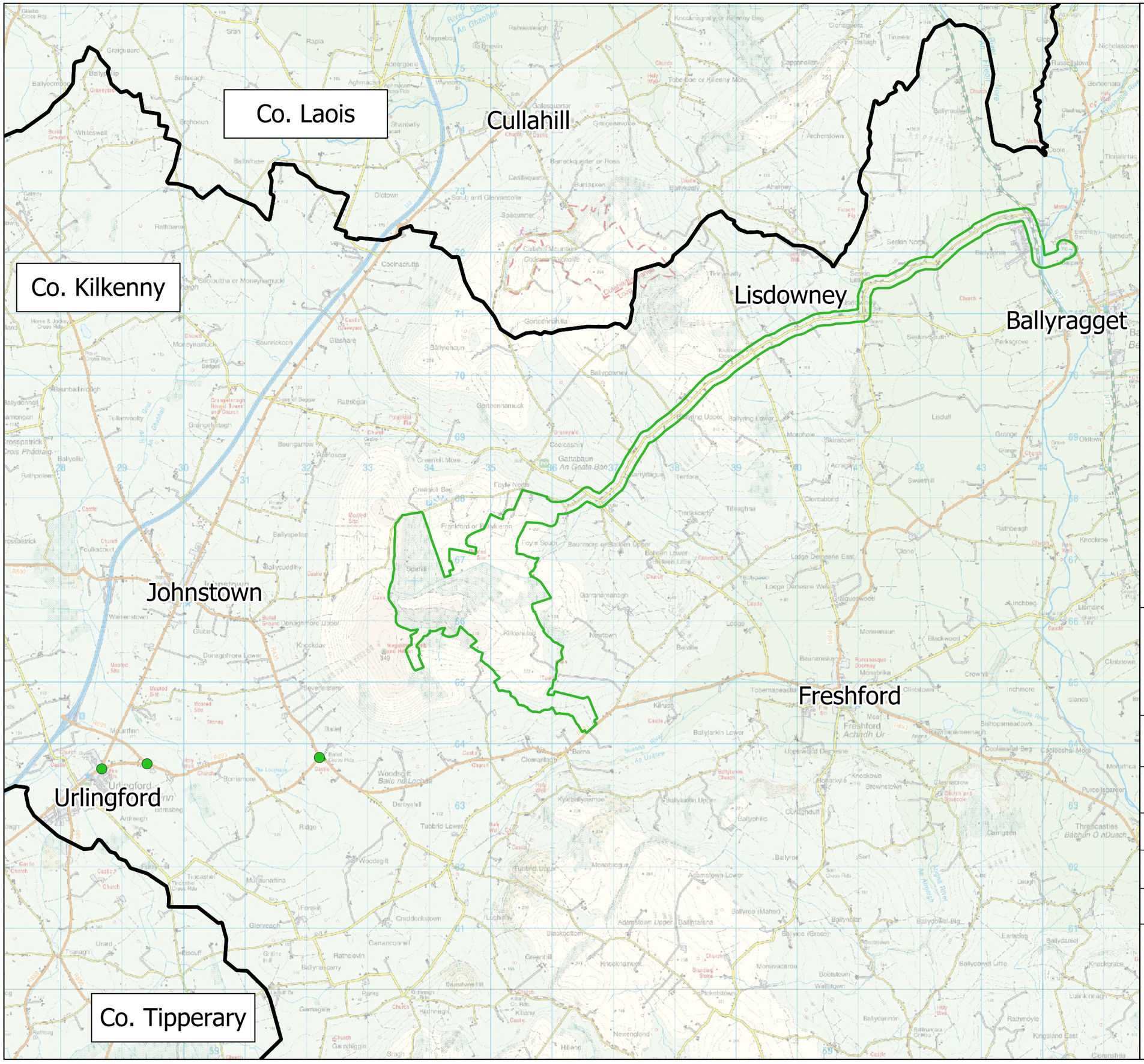
Francesca Rowson

Senior Planner

MKO

Enclosed

- **Appendix 1 –** Site Location Map
- **Appendix 2 –** Site Layout Plan
- **Appendix 3 –** Proposed Wind Farm Layout Plan
- **Appendix 4 –** Proposed Grid Connection Layout Plan
- **Appendix 5 –** Completeness Check Table



Map Legend

- EIAR Site Boundary
- Location of Temporary Accomodation Works
- County Boundary

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Drawing Title

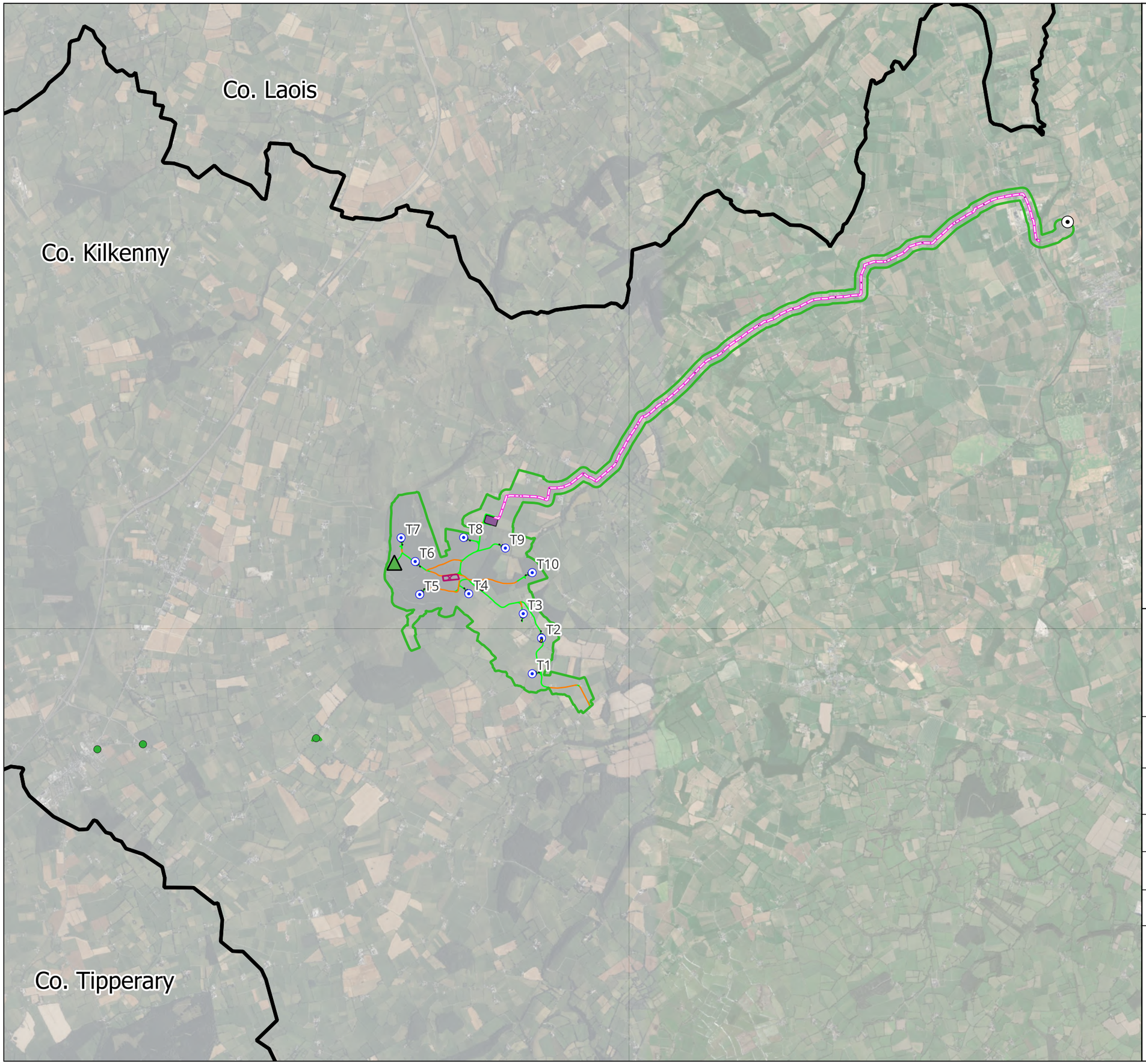
Site Location

Project Title

Killoshulan Wind Farm

Drawn By	Checked By
EC	JF
Project No.	**Drawing No.**
260172	Figure 1
Scale	**Date**
1:60,000	2026-09-21

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Website: ww.mkoireland.ie



Map Legend

- EIAR Site Boundary
- County Boundary
- Proposed Turbine
- Proposed Turbine Hardstands & Cranepads
- Proposed Construction Compounds
- Proposed Substation & BESS Area
- Proposed TDR Accomodation Area
- Proposed New Roads
- Existing Roads to be Upgraded
- Proposed Grid Connection Route
- Proposed Borrow Pit
- Proposed Spoil Management Area
- Proposed Met Mast
- Ballyragget 110kV Substation

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Drawing Title

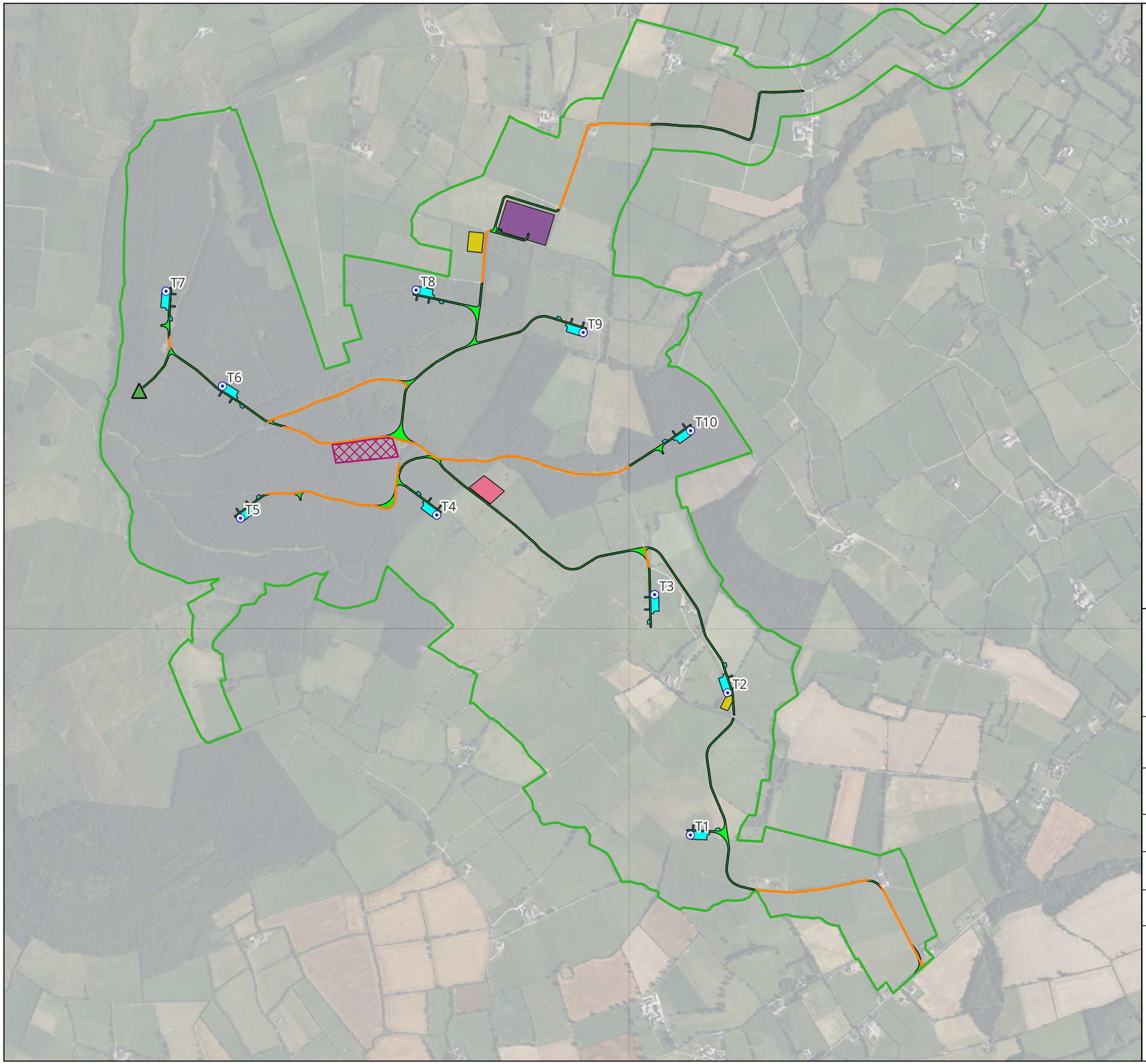
Proposed Site Layout

Project Title

Killoshulan Wind Farm

Drawn By	Checked By
EC	JF
Project No.	**Drawing No.**
260172	Figure 2
Scale	**Date**
1:60,000	2026-09-30

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Map Legend

- EIAR Site Boundary
- Proposed Turbine
- Proposed Turbine Hardstands & Cranepads
- Proposed Construction Compound
- Proposed Substation & BESS Area
- Proposed New Roads
- Existing Roads to be Upgraded
- Proposed Borrow Pit
- Proposed Spoil Management Area
- Proposed Met Mast

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Drawing Title

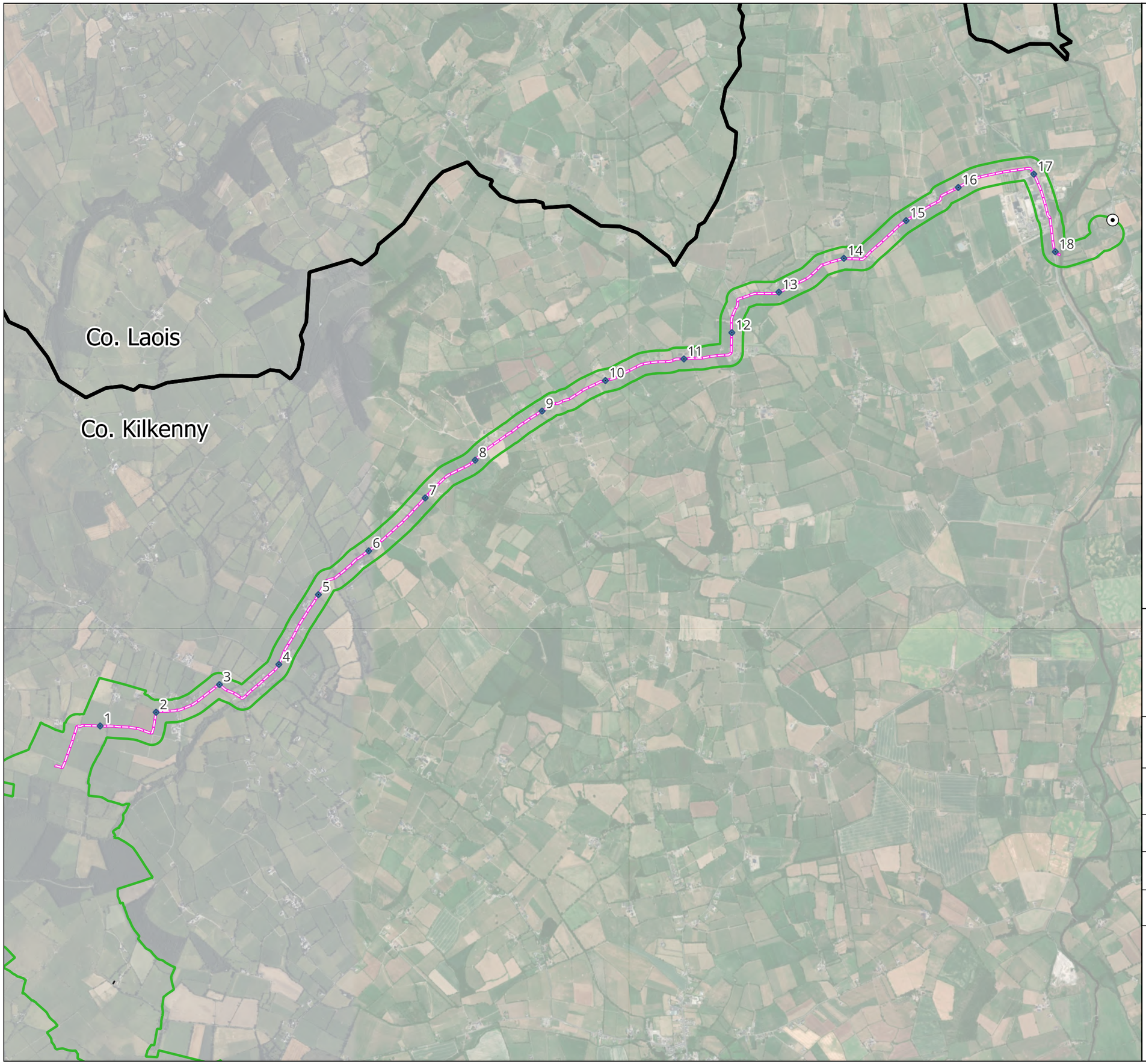
Proposed Wind Farm Layout

Project Title

Killoshulan Wind Farm

Drawn By	Checked By
EC	JF
Project No.	**Drawing No.**
260172	Figure 3
Scale	**Date**
1:15,000	2026-09-21

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Map Legend

- EIAR Site Boundary
- County Boundary
- Proposed Substation & BESS Area
- Proposed Grid Connection Route
- Proposed Joint Bay
- Ballyragget 110kV Substation

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Drawing Title

Proposed Grid Connection Route

Project Title

Killoshulan Wind Farm

Drawn By	Checked By
EC	JF
Project No.	**Drawing No.**
260172	Figure 4
Scale	**Date**
1:32,500	2026-09-30

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Appendix 5 – Completeness Check Table

Requirement	N/A	Yes	No	Note
Miscellaneous				
Correct fee submitted		X		The correct fee will be included with the application.
Completed copy of application form		X		The completed application form will be included with the application.
Is the application in the Gaeltacht area			X	The application is not in the Gaeltacht Area.
Standalone website provided		X		A standalone website will be developed for the application documentation submitted with the application.
1 no. hard copy and 9 no. soft copies		X		1 no. hard copy and 9 no. soft copies will be provided.
Land Ownership				
Interest of applicant in land confirmed, if no, written consent of owner submitted		X		All necessary letters of consent will accompany the planning application.
Design Flexibility				
Was a Design Flexibility Opinion served	X			Design Flexibility is not sought for this application.
If yes – does application comply with the Opinion	X			N/A
Public Notices				
Is time period and fee for submissions/observations specified		X		The Public Notices will provide the time period and fee for submissions/observations.
Reference to Renewable Energy Directive III and completeness check where applicable		X		The Public Notices will include the statutory RED III text as per the Commission's latest notice template.
Include standalone website address		X		The Public Notices will include the relevant standalone website address.
Are notices in Irish if in Gaeltacht area	X			The application is not in the Gaeltacht Area.
Transboundary environmental effects	X			The Proposed Project will not give rise to transboundary environmental effects.
Do COMAH Regulations (Major Accident Hazard Regulations 2015) apply			X	The COMAH Regulations are triggered solely by the presence of specified dangerous substances (or categories of substances, such as those classified as flammable, oxidising, or toxic) on site in quantities meeting or exceeding the lower-tier or upper-tier

Requirement	N/A	Yes	No	Note
				thresholds. The Proposed Project does not meet or exceed any of these thresholds.
If Design Flexibility provided, is this referenced	X			N/A - Design Flexibility is not sought for this application.
Are the EIAR and NIS referenced		X		The Public Notices will reference the EIAR and NIS.
Prescribed Bodies				
Have the Prescribed Bodies specified at conclusion of pre-application consultation been notified		X		The Prescribed Bodies specified at conclusion of pre-application consultation will be notified of the application.
Planning Statement				
Renewable energy designation policy statement		X		The application will be accompanied by a comprehensive Planning Report which will set out compliance of the Proposed Project with all relevant renewable energy policy.
EIAR				
Have EIAR portal requirements been completed		X		All EIAR portal requirements will be completed prior to submission.
Are all appendices referenced included		X		All appendices submitted with the EIAR will be referenced appropriately.
Are derogations required / been obtained (biodiversity)			X	No derogation licence will be required for this application.
Does EIAR comply with Article 94 and Schedule 6 of the Planning and Development Regulations 2001, as amended		X		The qualifications and experience of the principal staff involved in the preparation of the EIAR will be summarised in Chapter 1 of the EIAR. Each chapter of the EIAR has been prepared by a competent expert in the subject matter and their Statement of Authority will be included in the relevant EIAR chapter and appendix.
NPWS survey, methodology requirements		X		EIAR Volume 1: Main EIAR Report, and Volume 3: EIAR Appendices will provide detail on surveys and methodologies that are in line with current and developing best practice and guidance that will facilitate a robust Environmental Impact Assessment of the Proposed Project. Surveys included in the current application will be listed in Chapter 6 (Biodiversity) and Chapter 7 (Ornithology). Similarly, the NIS will provide detail on surveys and methodologies that will aim to be in line with current and developing best practice

Requirement	N/A	Yes	No	Note
				and guidance that will facilitate a robust appropriate assessment of the Proposed Project. On this basis, it is robustly contended that the application will meet the requirements of the completeness test on this aspect.
Peat stability/landslide susceptibility		X		A peat stability assessment is not required for the Site due to the absence of peat withing the proposed development area. Landslide susceptibility will be assessed within Chapter 8 'Land Soils & Geology' of the EIAR.
NIS				
Is a screening report included		X		An Appropriate Assessment Screening Report will be included as part of the NIS
Are all appendices referenced included		X		All NIS Appendices will be included as part of the NIS. A list of appendices will be provided within a table of contents at the beginning of the NIS.
Drawings				
Site Location Map		X		A Site Location Map will be included with the application.
Site Layout Plan – wayleaves, site notices		X		A Site Layout Map will be included with the application showing wayleave and site notice locations.
Are the drawing scales appropriate		X		Drawings will be included at the appropriate scales in line with regulations or as otherwise agreed with the Commission.