An Coimisiún Pleanála

Record of 3rd Meeting
ABP-314186-22

Case Reference / Description	Proposed development of 13 no. wind turbines together with all associated works Killoshulan and adjacent townlands, Co. Kilkenny.		
Case Type	Pre-application consultation		
1st / 2nd / 3rd / 4th Meeting	3rd Meeting		
Date	15/09/2026	**Start Time**	11:00am
Location	Virtually	**End Time**	12:30pm

Representing An Coimisiún Pleanála
Una Crosse, Assistant Planning Director
Alaine Clarke, Senior Planning Inspector
Finbarr Quigley, Senior Environmental Scientist
Fiona Patterson, Senior Ecologist
Sinead White, Executive Officer

Representing the Prospective Applicant
Neil O'Brien, Atlantic Infrastructure
John Tierney, Atlantic Infrastructure
Francesca Rowson, MKO
Mike Mekell, MKO
Eoin Mcarthy, MKO

Padraig Desmond, MKO
Kathryn Sheridan, MKO
Jonny Fearon, MKO
David Broderick, Hydro Environmental
Miriam Carroll, Tobar Archaeological Consultants

Introduction

The Commission referred to the letter received from the prospective applicant requesting a third pre-application meeting and referred to the second meeting held on 22nd June 2026. An Agenda had been forwarded to the prospective applicant in advance of the meeting as follows:

1. Update on Development Proposal/Development Description
2. Planning Policy
3. Biodiversity including Designated Sites, Fauna, Habitats and Aquatics
4. Ornithology including Designated Sites
5. Hydrology & Hydrogeology
6. Land & Soils
7. Noise and Shadow Flicker
8. Landscape & Visual
9. Cultural Heritage
10. Other Material Assets
11. Consultation

Presentation:

The prospective applicant set out their presentation, which is attached to the file.

Discussion:

Update on Development Proposal/Development Description

- The proposed development comprises 10 no. wind turbines, a 110kV substation, a battery energy storage system, grid connection, turbine delivery route accommodation works, meteorological mast and a borrow pit, among other infrastructure works.
- The Prospective Applicant outlined the rationale for the omission of former T4 which arose following the results received from site investigation works undertaken.

Ornithology

- The Commission's representatives advised the prospective applicant to review submissions on other REDIII projects in relation to ornithology within the wider area and consider the matters arising.
- The prospective applicant outlined that consultations undertaken with the NPWS had not raised any matters of concern.
- The applicant provided a list of key ornithological receptors. It was advised that the applicant should follow the relevant NatureScot guidance regarding adequate collection of dawn and dusk flight activity for diurnally active species such as golden plover and whooper swan.
- It was advised that the applicant should follow the relevant NatureScot guidance regarding vantage point survey effort and other ornithological surveys.
- It was advised that the consideration of collision risk should not only include the rate of collisions/year but also collisions over the lifetime of the windfarm.
- Regarding the methodology to be used, it was advised that the consideration of ecology and ornithology impact and statement of significance within said chapters is prepared in line with CIEEM (2024) guidance as the prevailing guidance for impact assessment on ecological receptors. This advice is based on submissions being received from the NPWS on similar applications wherein they are discouraging reliance on Percival (2003), due to it including out of date information and being superseded by other accepted methodologies, and EPA

(2022) guidance, which is not considered appropriate for the consideration of ecological receptors. As such, it was advised that CIEEM (2024) is considered the most appropriate guidance for ecological and ornithological impact assessments.

Appropriate Assessment (AA)

- The Commission's representatives noted the location of Spahill and Clomantagh Hill SAC adjacent to the proposed development boundary, the Loughans SAC to southeast (Applicant presentation noted Loughans turlough c.245m from nearest proposed infrastructure) and River Barrow and River Nore SAC crossed by grid cabling.
- Given the underlying geology & presence of karst in the area, it was advised that the AASR and NIS comprehensively address the potential connectivity from the subject development to the Loughans SAC via potential hydrological and hydrogeological pathways.
- It was advised that sufficient detailed scaled drawings (such as habitat mapping & construction footprint) is provided in the documentation to assist the Commission in undertaking their AA, for example at the proposed HDD crossing of the River Nore at Ballyragget and any works adjacent to the Spahill SAC.
- The Commission's representatives advised the prospective applicant to ensure that the AASR and NIS is robust and that mitigation measures are consistent across the EIAR and NIS.
- It was advised that any mitigation measures proposed need to clearly detail how they mitigate each likely significant impact in addition to describing how they will be implemented and degree of confidence in their likely success.
- The Commission's representatives noted that there are records of crayfish plague in the Nore catchment and advised that a protocol for minimising the risk of spread of crayfish plague during the grid connection works may need to be considered.

Biodiversity

- The Commission's representatives advised the prospective applicant that clarity should be provided in respect of what is proposed as mitigation to minimise likely significant impacts arising from the proposed development and any enhancement measures proposed to improve the current baseline.
- The Commission's representatives advised the prospective applicant that the following impacts should be considered in the consideration of ecology: impacts of dust and construction emissions, lighting impacts on bats and birds (construction and operation), cumulative and in-combination effects.
- The Commission's representatives advised the prospective applicant that any habitat management plans should consider adaptive management where relevant (e.g. replanting if initial planting fails).
- The prospective applicant noted that an existing bat foraging route along a hedgerow will be fragmented by a proposed access route and that new planting would be installed to encourage bats to follow a diversion route. The Commission's representatives advised that details on short/long term impacts should be provided including estimate of how long before the replacement planting would be back to same height and coverage as original existing hedgerow.
- It was advised that new edge habitats created in conifer plantations as a result of construction would be considered in the consideration of the impact assessment for bats.

Noise

- The prospective applicant was advised to include details of the Noise Sensitive Receptors (dwellings) which are associated with each of the 6 Baseline Monitoring Locations.
- The prospective applicant was advised to undertake a noise impact assessment of the BESS facility in accordance with BS4142 and the findings of this should

be considered in combination with the findings of the turbine operational noise impact assessment.

- The prospective applicant was advised to include a detailed curtailment plan if the noise impact assessment deems it necessary and to include sufficient and accurate details of sensitive receptors by way of Eircode, detailed mapping or other form. ITM coordinates of hundreds of receptors is not practical.

Hydrology/Hydrogeology

- The prospective applicant was advised that relying on GSI mapping and tracer dye test may not be sufficient to rule out connectivity between the site and the Loughan SAC. If connectivity is discounted this approach should be based on evidence from site investigation data. ACP advised that submissions relating to this issue are likely as NPWS have already flagged similar concerns on other projects.
- Similarly, the prospective applicant was asked about connectivity between the site and the Balief Group Water Scheme abstraction. The prospective applicant advised that while a letter was issued to the National Federation of Group Schemes, no direct communications between the prospective applicant and the local Group Water Scheme has taken place to date. ACP advised that this matter may be subject of observations associated with any future application.
- The prospective applicant advised that one turbine was removed from the proposed development due to both environmental and geotechnical concerns following ground investigations relating to the presence of karst features.
- The prospective applicant was advised to consider in detail the karst environment when designing the Surface Water Management Plan with particular focus on the locations proposed for disposal/infiltration sites. The expected infiltration rates should be assessed for both the limestone area and the poorly draining area to the north to take account of potential impacts on groundwater and surface water receptors respectively.

- The prospective applicant was advised to tabulate the ground investigation findings for trial pits, geophysics and boreholes for each turbine location or other infrastructure site.
- The prospective applicant confirmed that groundwater levels were generally >15m bgl and level monitoring data would be available for at least 12 months for at least one of the boreholes.
- ACP advised the prospective applicant to develop a 'Karst Protocol' to include a method statement for dealing with any karst features encountered during site excavations during construction. The prospective applicant was advised that template documents were available for other projects already completed.

Landscape and Visual

- It was advised that the prospective applicant address any residential receptors likely to be significantly impacted.
- Include reference to Kilkenny Castle in the assessment and any other historic monuments of significance within the 20km radius.

Cultural Heritage

- The Commissions representatives queried if archaeological geophysical surveys were undertaken/would be undertaken, and if the Department (NMS) had advised within the applicant's scoping exercise. Applicant advised that no archaeological geophysical surveys had been done, that the Department had not advised in relation to same. The Commissions representatives advised to review submissions from the Department in relation to other applications in context of the level of site investigation anticipated.
- The Commission's representatives also advised to consider the likely visual impacts which may arise on structures of historical significance.

EIAR

- The Commissions representatives requested that the prospective applicant to include a separate compendium of potential significant effects, pre- and post-mitigation within a chapter or appendix of the document.

Conclusion:

The Commission's representatives advised that the onus is on the prospective applicant to either request a further meeting or formal closure of the instant pre-application consultation process. The Commission's representatives advised that the record of the meeting will be issued in the meantime, and that the prospective applicant can submit any comments it may have in writing or alternatively bring any comments for discussion at the time of any further meeting.

The Meeting concluded at 12:30pm.

Una Crosse

Assistant Director of Planning