

**Extract of Draft Minutes - Ordinary Meeting of Kerry County
Council held on 15 July 2024**

15.07.2024.08 Section 37E Strategic Infrastructure Application

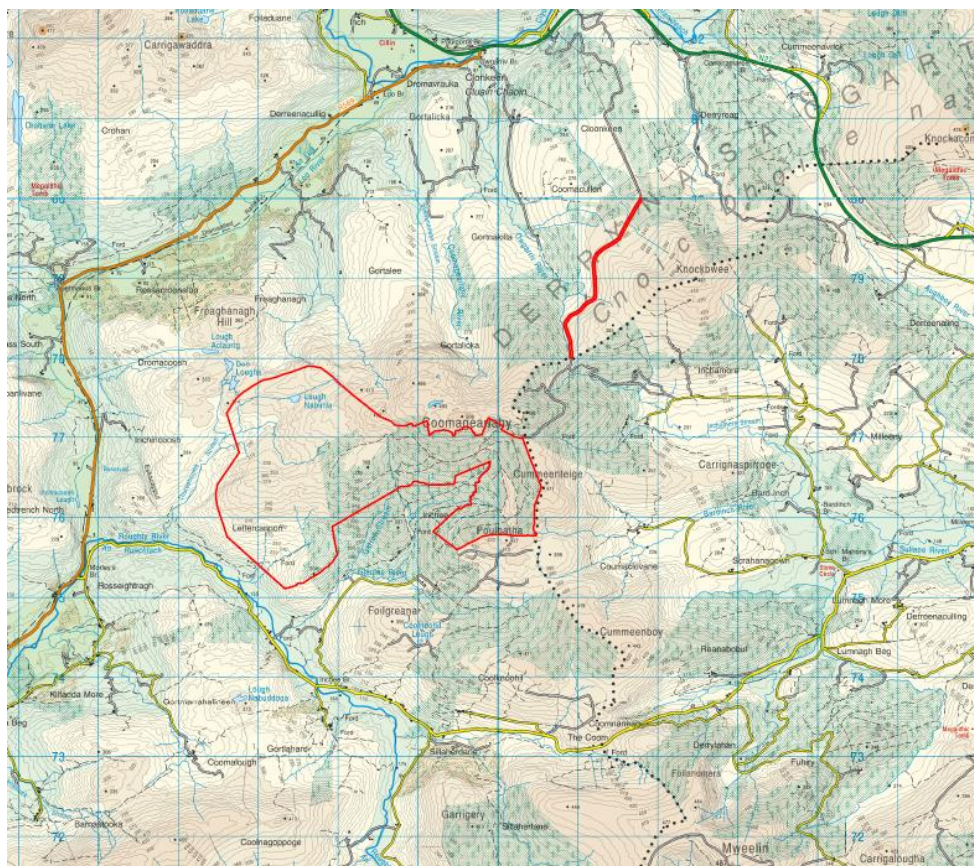
**(b) Section 37E Strategic Infrastructure Application Proposed Repowering
of Kilgarvan Wind Farm**

Mr. D. Ginty Senior Planner referred Elected Members to the report on the Strategic Infrastructure Application Ref. ABP-319471-24 for proposed removal of 28 no. existing turbines and relevant ancillary infrastructure and erection of 11 no wind turbines with a blade tip height range from 199.5m to 200m, a hub height range from 118m to 125m and a rotor diameter range from 149m to 163m, along with associated foundations and hard standing areas in the townlands of Inchincoosh, Inchee, Lettercannon, Coomacullen and Cloonkeen, Co. Kerry, in accordance with Section 37E (4) of the Planning and Development Act 2000 as amended and as inserted by Section 3 of the Planning & Development (Strategic Infrastructure) Act 2006. The detailed report which has been circulated to the Members for their consideration contains the views of the Planning Authority of the effect of the proposed development on the environment and proper sustainable development of the area.

Mr. D. Ginty, Senior Planner, outlined the report as had been circulated:

Proposed Repowering of Kilgarvan Wind Farm

Removal of 28 no. existing turbines and relevant ancillary infrastructure and erection of 11 no wind turbines with a blade tip height range from 199.5m to 200m, a hub height range from 118m to 125m and a rotor diameter range from 149m to 163m, along with associated foundations and hard standing areas in the townlands of Inchincoosh, Inchee, Lettercannon, Coomacullen and Cloonkeen, Co. Kerry



An Bord Pleanála Ref: ABP-319471-24

Submission to An Bord Pleanála by Kerry County Council pursuant to Section 37E (4) of the Planning and Development Acts, 2000, as amended.



July 2024

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1.0 Introduction.

1.1 Legal Context.

This submission has been prepared in accordance with the provisions of Section 37E (4) of the Planning and Development Act 2000 as amended and as inserted by Section 3 of the Planning & Development (Strategic Infrastructure) Act 2006.

This report contains the views of the Planning Authority on the effects of the proposed development on the environment and the proper planning and sustainable development of the area with respect to matters specified under Section 34(2) of the Planning and Development Acts 2000 as amended.

1.2 Applicant Details.

The applicant is Orsted Onshore Ireland Midco Ltd, a renewable energy company who own and operate a 378 MW portfolio of onshore wind farms across the island of Ireland.

Address: Floor 5, City Quarter, Lapp's Quay, Cork, T12 A2XD

1.3 Development Location.

The proposed development is located in the of Inchincoosh, Inchee, Lettercannon, Coomacullen and Cloonkeen, Co. Kerry.

1.4 Development Description.

The proposed development will consist of:

- a) Removal of 28 no. existing turbines and relevant ancillary infrastructure permitted under Kerry County Council and An Bord Pleanála Planning References; 02/124, 03/2176, 03/2306, 07/1605, 07/4364, Pl. 08.209629, 07/4515, 07/4701, Pl. 08.232259 and 05/1351;
- b) Erection of 11 no. wind turbines with a blade tip height range from 199.5m to 200m, a hub height range from 118m to 125m and a rotor diameter range from 149m to 163m, along with associated foundations and hard standing areas;
- c) A thirty-five year operational life from the date of full commissioning of the wind farm;
- d) Underground electrical 33kV and communication cabling connecting the proposed turbines and meteorological mast to the existing 110kV Coomagearlahy substation in the townland of Inchee;
- e) Upgrade of and the continued use of the existing onsite Coomagearlahy 110kV substation in the townland of Inchee, permitted under Kerry County Council References 07/3648, 04/1648, 06/1143, 06/2660;
- f) Upgrade of existing tracks, hardstand areas and provision of new site access roads and junctions;
- g) The extension and reuse of the 1 no. existing borrow pit;
- h) 2 no. temporary construction compounds;
- i) Meteorological mast, with a height of 100m and upgrade of existing associated foundation and hard standing area;
- j) Forestry felling;
- k) Site drainage;
- l) Biodiversity Enhancement measures;
- m) Operational stage site signage; and,
- n) All ancillary works and apparatus.

The applicant is seeking a 10-year permission with an operational life of 35 years once commissioned.

An Environmental Impact Statement Report (EIAR) and Natura Impact Statement (NIS) has been prepared in relation to the project and accompany this planning application.

1.5 Project Overview

This proposal seeks to decommission the existing 28 no. turbines, replace them with 11 no. wind turbines, and upgrade the associated infrastructure at the Existing Kilgarvan Wind Farm site in the townlands of Inchincoosh, Lettercannon, Inchee, Coomacullen, and Cloonkeen in County Kerry. As part of this, it is noted that upgrade works are proposed to the existing 110kV Coomagearlahy sub-station.

The proposal provides for a limited range of turbine dimensions comprising: a total tip height in the range of 199m minimum to 200m maximum; a hub height in the range of 118m minimum to 125m maximum, and a rotor diameter in the range of 149m minimum to 163m maximum. Each turbine will be capable of generating from approximately 6 MW to 7.2 MW, with an overall installed capacity of at least 50MW. A borrow pit, a met mast as well as 2.No construction compounds are also proposed. The borrow pit would be an extension of an existing one. It is outlined that the borrow pit would be excavated by breaking or blasting and would be backfilled with up to 3m of peat and spoil material.

In terms of the range of turbine dimensions proposed, the discussion surrounding multiple design variations with regards to the proposed development took place in the context of the consultations with the Board under Section 37B of the Act. The Board's representatives advised that the prospective applicant could submit an application accompanied by an EIAR that assessed options proposed by the applicant, as outlined in the Board's written record of this meeting on 7th of December 2022. A robust assessment of the turbine options put forward with this application has been included within Chapter 3 Reasonable Alternatives of the EIAR.

This application seeks a ten-year permission and a 35-year operational life from the date of full commissioning of the Proposed Development

The application is accompanied with an EIAR and an NIS. A 'white-tailed eagle outline risk management plan' and other reports are included within the appendices to the EIAR.

2.0 Site Context.

2.1 Site Location and Description.

The Proposed Development site is located entirely in the administrative area of County Kerry, contiguous to the border of County Cork, approximately 5.5km northeast of the village of Kilgarvan Co. Kerry, and approximately 6km west of Coolea, Co. Cork. It is proposed to continue to access the wind farm site via the existing wind farm entrance off the N22 at Cloonkeen.

Current land-use on the site comprises wind energy in relation to the Existing Kilgarvan Wind Farm, low-intensity agriculture and small areas of coniferous forestry. Land-use in the wider area comprises a mix of agriculture, low density residential areas, commercial forestry and wind energy. The Site Location context is shown in Figure 1 below.

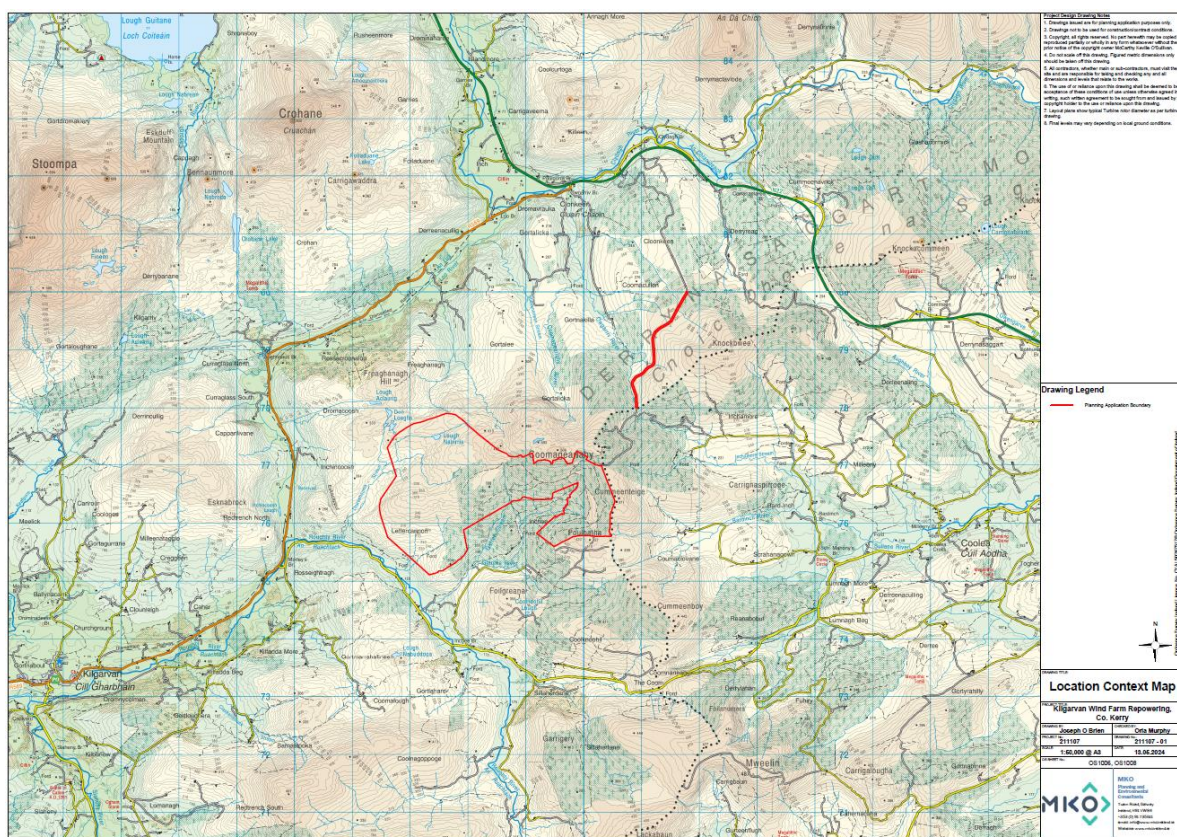


Figure 1: Location Context Map

The Proposed Development is located within an area designated in the adopted Kerry County Development Plan, 2022-2028 as a 'Repower Area'. This area is indicated on Figure 2 below.

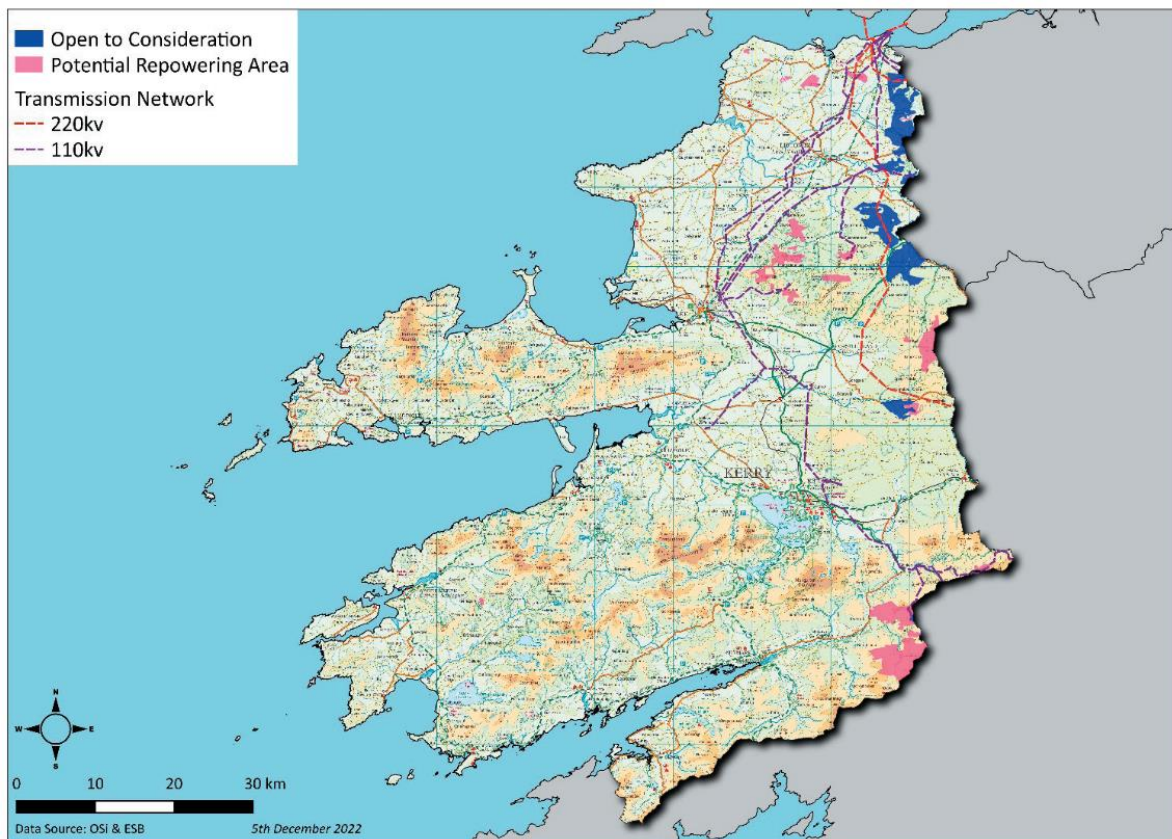


Figure 2: Wind Energy Area (Kerry County Development Plan 2022-2028)

2.2 Relevant Planning History Relating to the Subject Site and the Surrounding Area.

Kilgarvan I

The first windfarm, known as Kilgarvan I was granted planning permission in December 2002 and subsequently began to operate in 2006.

This windfarm consists of a total of 4 no. planning applications:

- Pl. Ref: 02/1241 – The development of 17 no. 60m in height wind turbines
- Pl. Ref: 03/2176 - change the turbine hub height from 60m to 80m in the existing planning permission for a wind farm (Pl. Ref: 02/1241)
- Pl. Ref: 03/992176 (Extension of Duration on 03/2176)
- Pl. Ref: 03/2306 – 4 turbine extension to the existing wind farm

Kilgarvan II

The second windfarm, known as Kilgarvan II was granted permission under three separate windfarm sites – Inchincoosh, Lettercannon and Sillahertane, and began operation collectively in 2009. These are summarised as follows:

Inchincoosh Windfarm: The Inchincoosh project consists of six Nordex N90 turbines, granted planning permission under Kerry County Council Pl. Ref. 07/1605 and Ref. 07/4364, each with a hub height of 80m and a rotor diameter of 90m. The overall height from ground to blade tip for each turbine is 125m.

Lettercannon Windfarm: The Lettercannon project consists of seven Nordex N90 turbines & associated infrastructure granted planning permission under An Bord Pleanala Ref PL 08. 209629 & Kerry County Council Refs. 07/4515 and Ref. 07/4701, each with a hub height of 80m and a rotor diameter of 90m. The overall height from ground to blade tip for each turbine is 125m.

Sillahertane Windfarm: The Sillahertane project consists of 10 no. 850kW Vestas V52 wind turbines granted planning permission under Kerry County Council Pl Ref 03/1359. o This application does not form part of the repowering project, and therefore is not reviewed further in this Report.

Planning Reference	Development Description	Applicant	Decision
Kilgarvan I			
02/1241	Construct a windfarm consisting of 17 wind turbines, an electrical substation with control building, 2 no. 50m high meteorological masts, construct and extend existing internal site tracks and associated works - EIS received	Coillte Teoranta And SWS Services Co-Op	Conditional 27/12/2002 30 Conditions
03/2176	Change the turbine hub height from 60m to 80m in the existing planning permission for a wind farm (EIS received)	Coillte Teoranta & SWS Services Co-Op Ltd	Conditional 2 Conditions 22/10/2003
03/992176	The change of turbine hub height from 60m to 80m in the existing planning permission for a wind farm	SWS Natural Resources Ltd.	Extension of Duration Granted – Expiry 21 st October 2018
03/2306	Construct a wind farm extension to planning reg no 1241/02, extension will consist of 4 wind turbines (hub height 80 m, blade diameter 80 m), construction and extension of existing internal site tracks and associated works. EIS received	SWS Group & Coillte	Conditional 15 Conditions 28/10/2003
07/3648	Carry out alteration to an existing electrical substation (planning ref. No. 02/1241) where the alteration is an additional transformer bay and 20kv substation including a control building, power transformer, reactive power compensation system and associated works.	SWS Natural Resources Ltd.	Conditional 1 Condition 13/11/2007
19/1325	The installation of battery arrays, located within container units (18 number units, each 30m2 by c.2.6m tall), a control building (c.160.5m2 by c.6.4m tall) and transformer (c.5m tall). The development will include for ancillary infrastructure including security fencing, lighting, CCTV,	Brookfield renewable Ireland LTD.	Conditional 8 Conditions 28/07/2020

Planning Reference	Development Description	Applicant	Decision
	internal access roads and drainage. The overall development site is c.1.6ha. The application includes a natura impact statement (NIS)		
Kilgarvan II			
Inchincoosh			
07/1605	Erect six wind turbines hub height 80m, blade diameter 90m, one 80m high meteorological mast, four borrowpits, construction of internal site tracks and associated works	John O'Donoghue, Helen O'Sullivan And Daniel Quill	Conditional for 5 no. turbines 13 Conditions 02/08/2007 Refused Turbine No. 6.
07/4364	Erect one wind turbine, hub height 80m, blade diameter 90m (as an addition to a five wind turbine development granted permission under planning ref. No. 07/1605) and to construct an internal site track and associated works	John O'Donoghue, Helen O'Sullivan And Daniel Quill	Conditional 12 Conditions 29/01/2008
Lettercannon			
ABP Ref: 08.209629 LPA Ref: 03/2508	6 no. 3MW wind turbines, service roadways and control house and 1 no. 60m monitoring mast (temporary) and river crossing (temp.) and associated works	John Dineen	Conditional (Revised) 12 Conditions 27/04/2005
07/4515	Move one wind turbine (T1) as an alteration to a six wind turbine development granted planning permission by An Bord Pleanála (ABP ref pl. 08.209629 and Kerry County Council planning register ref 03/2508). It is proposed to move the turbine approximately 480m to the northeast of its current location	SWS Natural Resources Ltd	Conditional 12 Conditions 13/02/2008
07/4701	Erect one wind turbine (T9), hub height 80m, blade diameter 90m, as an addition to a six wind turbine development granted planning permission by An Bord Pleanála (ABP ref: pl.08.209629 and Kerry County Council planning register ref. 03/2508) and to construct an internal site track and associated works	SWS Natural Resources Ltd	Conditional 12 Conditions 22/02/2008

Planning Reference	Development Description	Applicant	Decision
ABP Ref: P08.232259 LPA Ref: 08/2298	Erect 1 no. permanent meteorological mast of 80 metres in height with internal access road	Inchincoosh Windfarm Ltd.	Conditional (Revised) 5 Conditions 07/07/2009
05/1351	Erect two temporary 75m high meteorological masts for a duration of 3-4 months, the erection of two permanent 75m- high meteorological masts and associated equipment for the purposes of monitoring windspeeds	SWS Natural Resources	Conditional 17 Conditions 31/08/2010
Grid Infrastructure			
04/1648	Construct an overhead transmission line of single circuit 110kv from the windfarm at Inchee and construct a 110kv switching substation. An EIS has been submitted in support of this application.	Coillte Teoranta And South Western Services Co-Op Society	Conditional 10 Conditions 24/02/2005
06/1143	Alteration to 110kv substation (planning ref. No. 04/1648) where the alteration is 1 no. Additional end mast tower (18m high), 1 no. Additional static wire lightening conductor and the re-orientation of site control building as required by ESB national grid	SWS Natural Resources	Conditional 1 Condition 31/05/2006
06/2660	For the alteration to 100kv substation (planning ref no. 04/1648) where the alteration is 1 no. Additional line bay consisting of circuit breaker and associated equipment as required by ESB national grid	ESB National Grid	Conditional 1 Condition 18/10/2006
04/356 – Cork County Council	Construction of 5.8km overhead transmission line of single circuit 110kV	Coillte Teoranta	Granted – Unconditional 12/07/2004
Other Applications			
01/2351	To erect a 30 meter telecommunications hexagonal lattice tower with transmission equipment container	Meteor Mobile Communications	Conditional 13 Conditions 01/11/2006
ABP Ref: PL08.221244 LPA Ref: 06/3727	Retention of development consisting of a 30 metre hexagonal lattice tower with transmission equipment, associated equipment container and previously granted under Planning Ref No. 01/2351	Meteor Mobile Communications Limited	Conditional 2 Conditions 31/05/2007

Planning Reference	Development Description	Applicant	Decision
11/990	Retain and operate an existing 30m hexagonal lattice tower with transmission equipment, equipment container and palisade perimeter fencing as permitted under planning ref no. 06/3727; ABP PL08.221244	Meteor Mobile Communications Limited	Conditional 4 Conditions 26/03/2012
18/496	Retain an existing development at this site. The development consists of an existing 30 metre high telecommunications support structure carrying telecommunications equipment, together with existing equipment container and associated equipment within a fenced compound as previously granted under local authority ref. No. 11/990.	Meteor Mobile Communications Limited	Conditional 3 Conditions 28/09/2018

Table 1 – Valid Planning History

2.3 Relevant enforcement information relating to the subject site.

There are no enforcement procedures relating to the site.

3.0 Relevant European, National, Regional and Local Policies.

3.1 UN Sustainable Development Goals 2030

The UN 2030 Agenda is a plan of action for people, the planet and prosperity which seeks to better incorporate sustainability into planning and policy. The plan sets out 17 Sustainable Development Goals (SDGs) that integrate the three indivisible dimensions of sustainable development – 1) Economic, 2) Social and 3) Environmental (see Figure 2).



Figure 3: UN Sustainable Development Goals

3.2 European Context.

3.2.1 Europe 2020

European spatial planning is closely interlinked with a number of trans-national, regional, economic and environmental policies and programmes. The European Union's cohesion policy is currently divided into 11 no. Thematic Objectives (TO) (see Figure 3), aimed at reducing disparities in the development of its territories and to contribute to the priorities of smart, sustainable and inclusive growth envisaged by the Strategy 'Europe 2020'.



Figure 4: 11 EU Cohesion Policy Thematic Objectives

3.2.2 European Green Deal 2019

The European Green Deal is a new growth strategy that aims to transform the EU into a fair and prosperous society, with a modern, resource-efficient and competitive economy where there are no net emissions of greenhouse gases in 2050 and where economic growth is decoupled from resource use. It is about improving the well-being of people, making Europe climate neutral and protecting the natural habitat which will be good for people, the planet and the economy. The aims of the Green Deal are: for Europe to become climate-neutral by 2050; to protect human life, animals and plants by cutting pollution; to help companies become world leaders in clean products and technologies; and to help ensure a just and inclusive transition.

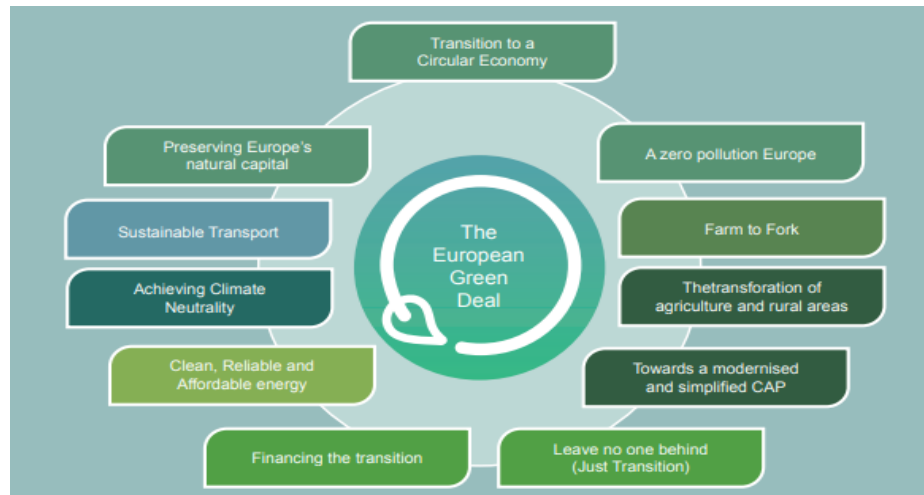


Figure 5: The European Green Deal

The European Green Deal focuses on 3 key principles for the clean energy transition, which will help reduce greenhouse gas emissions and enhance the quality of life of our citizens:

1. Ensuring a secure and affordable EU energy supply
2. Developing a fully integrated, interconnected and digitalised EU energy market
3. Prioritising energy efficiency, improving the energy performance of our buildings and developing a power sector based largely on renewable sources

The Commission's main objectives to achieve this are outlined as to:

- Build interconnected energy systems and better integrated grids to support renewable energy sources
- Promote innovative technologies and modern infrastructure
- Boost energy efficiency and eco-design of products
- Decarbonise the gas sector and promote smart integration across sectors
- Empower consumers and help EU countries to tackle energy poverty
- Promote EU energy standards and technologies at global level
- Develop the full potential of Europe's offshore wind energy

3.2.3 European Commission Energy Roadmap 2050.

In December 2011, the European Commission adopted the Energy Roadmap 2050, which commits the EU to reducing greenhouse gas emissions to 80-95% below 1990 levels by 2050 in the context of necessary reductions by developed countries as a group.

3.2.4 European Green Deal and European Climate Law.

The European Green Deal provides an action plan to boost the efficient use of resources by moving to a clean, circular economy and restore biodiversity and cut pollution. The plan outlines investments needed and financing tools available. It explains how to ensure a just and inclusive transition.

The EU aims to be climate neutral by 2050. A European Climate Law is proposed to turn this political commitment into a legal requirement. As part of the European Green Deal, the Commission proposed in September 2020 to raise the 2030 greenhouse gas emission reduction target, including emissions and removals, to at least 55% compared to 1990.

It looked at the actions required across all sectors, including increased energy efficiency and renewable energy, and started the process of making detailed legislative proposals by June 2021 to implement and achieve the increased ambition.

This will enable the EU to move towards a climate-neutral economy and implement its commitments under the Paris Agreement by updating its Nationally Determined Contribution.

The 2030 climate and energy framework includes EU-wide targets and policy objectives for the period from 2021 to 2030.

3.2.5 2030 Climate and Energy Framework - existing ambition.

Key targets for 2030:

- At least 40% cuts in greenhouse gas emissions (from 1990 levels)
- At least 32% share for renewable energy
- At least 32.5% improvement in energy efficiency

The 40% greenhouse gas target is implemented by the EU Emissions Trading System, the Effort Sharing Regulation with Member States' emissions reduction targets and the Land use, land use change and forestry Regulation. In this way, all sectors will contribute to the achievement of the 40% target by both reducing emissions and increasing removals.

All three pieces of climate legislation will now be updated with a view to implementing the proposed net greenhouse gas emissions reduction target.

3.2.6 Renewable Energy Directive – recast to 2030 (RED II).

In December 2018, the revised renewable energy directive 2018/2001/EU entered into force. In RED II, the overall EU target for Renewable Energy Sources consumption by 2030 has been raised to 32%. The Directive 2009/28/EC specifies national renewable energy targets for 2020 for each country. In particular, the RED II introduces sustainability for forestry feedstocks. It introduces the process known as indirect land use change (ILUC) which relates to development in carbon stock areas such as forests, wetlands and peatlands. As this may cause the release of CO₂ stored in trees and soil, indirect land use change risks negating the greenhouse gas savings that result from renewable energy.

3.3 National Context.

3.3.1 The Climate Action and Low Carbon Development (Amendment) Act 2021

The Climate Action and Low Carbon Development (Amendment) Act 2021 was signed into law on the 1st July 2021. The Act commits Ireland to becoming a carbon-neutral economy by no later than 2050 and to reduce emissions by 51% by the end of this decade and is binding on the entire state. The Act requires local authorities to prepare and update every five years individual Climate Action Plans which will include both mitigation and adaptation measures. The Act also requires that Local Authority Development Plans be aligned with their Climate Action Plan and that more generally that public bodies are required to take account of Climate Action plans in the performance of their functions.

3.3.2 Climate Action and Low-Carbon Development

National Policy Position Ireland. (Department of the Environment, Climate and Communications 2013 & 2021)

National climate policy in Ireland –

- Recognises the threat of climate change for humanity;
- Anticipates and supports mobilisation of a comprehensive international response to climate change, and global transition to a low-carbon future;
- Recognises the challenges and opportunities of the broad transition agenda for society; and
- Aims, as a fundamental national objective, to achieve transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050.

3.3.3 Climate Action Plan 2019.

The Climate Action Plan states Ireland will support the ambition emerging within the EU to achieve a net zero target by 2050. The plan also commits to evaluate in detail the changes required to adopt such a goal in Ireland. A pathway to 2030 is considered which would be consistent with a net zero target by 2050. Key features include:

- A five-year Carbon Budget and sectoral targets with a detailed plan of actions to deliver them
- A Climate Action Delivery Board overseen by the Department of the Taoiseach
- An independent Climate Action Council to recommend the Carbon Budget and evaluate policy
- Strong accountability to an Oireachtas Climate Action Committee
- Carbon proofing all Government decisions and major investments

The proposal is to increase reliance on renewables from 30% to 70% adding 12GW of renewable energy capacity (with peat and coal plants closing). It is noted that this will be a significant challenge. It is proposed to better manage peatlands and soils to deliver carbon abatement from land-use. It notes peatlands cover 21% of the state's land area and accounts for 64% of its total soil organic carbon stock, but is very vulnerable to drainage for forestry, grazing and extraction. Measures to develop and manage this carbon sink include undertaking further research to assess the potential to sequester, store and reduce emissions of carbon through the management, restoration and rehabilitation of peatlands as outlined in the National Peatlands Strategy.

3.3.4 Policy Statement on Security of Electricity Supply

Section 2 identifies key challenges, including maintaining security of electricity supply throughout the transition to up to 80% renewable energy by 2030. Much of the older, higher emission conventional generation is expected to close in coming years and will need to be replaced by generation that provides the same support and backup capability but that is also flexible, supporting high levels of wind and solar generation. As more wind, solar, storage and interconnection is added to the system, conventional generation is expected to operate less. Sufficient conventional generation capacity will still be required but will spend much of its time in reserve for when needed. Natural gas will form the vast majority of this conventional generation, for which there will be a continuing need beyond 2030.

Section 3 recognises the need for significant investment in additional flexible conventional electricity generation, grid infrastructure, interconnection and storage. The Government has approved that:

- The development of new conventional generation (including gas and gasoil / distillate-fired generation) is a national priority and should be permitted and supported to ensure security of supply and support the growth of renewable electricity generation.
- It is appropriate that existing conventional generation capacity, including coal, heavy fuel oil and biomass fired generation, be retained until the new conventional electricity generation capacity is developed.
- The connection of large energy users to the electricity grid should take account of the potential impact on security of supply and the need to decarbonise the grid.
- It is appropriate for additional electricity transmission and distribution grid infrastructure, interconnection and storage to be permitted and developed in order to support the growth of renewable energy and security of electricity supply.
- It is appropriate for additional natural gas transmission and distribution grid infrastructure to be permitted and developed to support security of supply.

3.3.5 National Planning Framework: Project Ireland 2040

The National Planning Framework is the national planning policy document for Ireland. It is a strategic plan that sets out a goal for Ireland to 2040. One of the key principles of the National Planning Framework is that of Transition to a Low Carbon and Climate Resilient Society. It sets out a series of National Policy Objectives, the following being pertinent to the proposed development:

NPO 52 - The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the requirements of all relevant environmental legislation and the sustainable management of our natural capital.

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.

3.3.6 Wind Energy Development Guidelines for Planning Authorities 2006.

The guidelines provide advice on wind energy development in terms of the Development Plan and development management processes. Chapter 6 provides guidance on siting and design of wind energy development in the landscape. This includes advice on siting, spatial extent and scale, cumulative effect, spacing of turbines, layout of turbines and height of turbines. Advice is also given regarding landscape character types as a basis for the application of the guidance on siting and design. It is acknowledged that visual impact is amongst the more important issues to be taken into account when deciding a particular application. The factors to be assessed comprise landscape sensitivity, visual presence of the wind farm, its aesthetic impact on the landscape and the significance of that impact.

As per these Guidelines the current proposed site could be assessed as, in part ‘Flat Peatland’ with some elements of ‘Hilly and flat farmland’ in accordance with the landscape character types. While flat peatlands are considered generally appropriate for wind farm development it is noted that:

‘the openness of vista across these landscapes will result in a clear visibility of other wind energy developments in the area. Given that the wind energy developments are likely to be extensive and high, it is important that are not perceived to crowd and dominate the flat landscape. More than one energy development might be acceptable in the distant background provided it was only faintly visible under normal atmospheric conditions’.

In relation to hilly and flat farmland it is stated ‘*due regard must be given to houses, farmsteads and centres of population*’. In relation to height it is stated ‘*Turbines should relate in terms of scale to landscape elements and will therefore tend not to be tall*’. Again, as with areas characterised as flat peatlands it is noted the wind farms should never dominate the landscape.

The guidelines are currently under review.

3.3.7 Draft Revised Wind Energy Development Guidelines, December 2019 Department of Housing, Planning and Local Government.

The Guidelines primarily focus on addressing a number of key aspects including noise, visual amenity, setback, shadow flicker, community consultation obligations, community dividend and grid connections. The guidelines are intended to ensure a consistency of approach throughout the country in the identification of suitable locations for wind energy development and the treatment of planning applications for wind energy developments.

A setback distance for visual amenity purposes of 4 times the tip height is to be applied between a wind turbine and the nearest point of the curtilage of any residential property in the vicinity of the proposed development, subject to a mandatory minimum setback of 500 metres.

The Draft Guidelines confirm a policy of zero shadow flicker and contain a similar siting and layout guidance with respect to flat peatland areas as the 2006 guidelines.

3.3.8 Department Circular PL5/2017 - Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change

In 2017, the (then) Department of Housing, Planning, Community, and Local Government issued Circular PL5/2017 to provide an update on the advice contained within previous Departmental Circular PL20-13. Circular PL20-13 advised that local authorities should defer

amending their existing Development Plan policies in relation to wind energy and renewable and should instead operate their existing development plan policies and objectives in relation to wind and renewables until the completion of a focused review of the Wind Energy Development Guidelines 2006. The new circular (PL05/2017) reconfirms that this continues to be the advice of the Department.

The Department Circular also sets out the four key aspects of the preferred draft approach being developed to address the key aspects of the review of the 2006 Wind Energy Guidelines including noise limits, visual amenity setback, shadow flicker elimination, and community engagement and benefit obligations.

3.4 Regional Context.

3.4.1 Regional Spatial and Economic Strategy.

Southern Regional Assembly has the responsibility for the preparation and implementation of a Regional Spatial and Economic Strategy (RSES) for the Southern Region. The RSES sets out the strategic regional development framework for the Region. The primary aim of the RSES is to implement Project Ireland 2040 - the National Planning Framework (NPF), at the regional tier of Government and to support NPF policy for achieving balanced regional development.

The Regional Spatial and Economic Strategy supports the research and development of renewable energy resources throughout the southern region. In particular, RPOs 95-104 support renewable energy generation (both onshore and offshore), the upgrading of the grid to integrate renewable energy resources, and innovation and research (including energy storage and carbon capture).

3.5 Local Context.

3.5.1 Kerry County Council Local Authority Climate Action Plan 2024-2029

Local Government has been identified as a key player in leading climate action at a local, community-based level. Local Authorities (LAs) have been tasked with leveraging support and resources to deliver effective climate action from the ground up. This approach has been made into law requiring each Local Authority in the country to lead in Climate Action at a county level. It is envisaged that leadership will be plan-led namely through a Local Authority Climate Action Plan (LACAP). Kerry County Council seeks to influence, advocate and facilitate climate action ambitions within the local community. These ambitions and pathways to achieve targets are outlined in this plan.

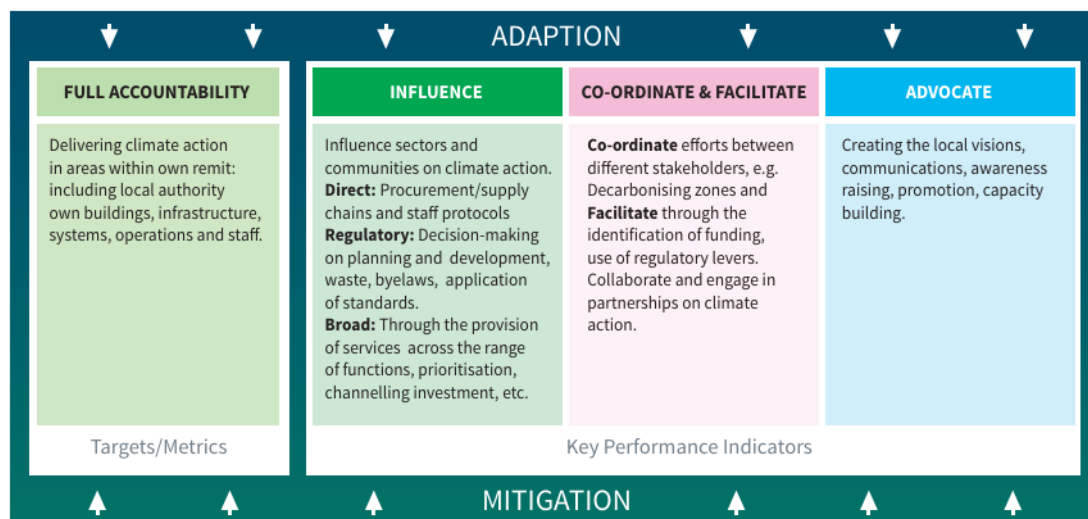


Figure 6: Role of Local Government within Climate Action – from full accountability of its own GHG emissions through to influencing, co-ordinating/facilitating and advocating across its range of functions and responsibilities



Figure 7: Strategic Goals of the Kerry County Council Local Authority Climate Action Plan 2024-2029

REF	MEASURE
EG1	Promote climate action projects that support and maximize environmental cobenefits, such as biodiversity protection and enhancement; improved air, water or soil quality; or enhanced recreation, amenity and cultural heritage value, to ensure win-win benefits are gained.
EG2	Support or facilitate climate action related projects and initiatives which seek to make improvements in soil structure, management and health by increasing soil organic carbon - which will create the environmental co-benefits of improving flood resilience by enhancing water holding capacity of soils and increasing the level of GHG sequestration associated with land use functions.
EG3	Ensure all development underpinned or supported by climate action is planned and implemented in a manner that appropriately considers the potential for environmental co-benefits, potential environmental impacts and environmental protection requirements. No climate action related development project that is likely to have significant negative effects on the receiving environment shall be supported.
EG4	Flood projects, or related maintenance works, shall be carried out in a manner that promotes climate action-biodiversity related co-benefits, and shall have due regard for the protection and enhancement of rare, protected or important habitats and species.
EG5	Ensure climate action related projects are carried out in a manner that promotes climate action-cultural heritage co-benefits, and do not result in unauthorized physical damage to cultural, archaeological or architectural features, or unauthorized or inappropriate alteration of the context of sensitive cultural heritage features.
EG6	Ensure climate action related projects are carried out in a manner that promotes climate action water quality co-benefits, and align with the provisions of the Water Framework Directive and relevant River Basin Management Plan.
EG7	Promote climate action projects that support protected trees, hedgerows and other habitats such as wetlands, flood zones which contribute to green infrastructure.
EG8	Support opportunities to improve ecological connectivity of non-designated habitats and sites to improve overall ecosystem resilience and functioning while supporting climate action within the county.
EG9	Ensure all projects supported by the council have taken the necessary precautions to identify and manage invasives species, particularly with regard to Schedule III species. No climate action related development project that is likely to cause the spread of invasives species listed in Schedule III shall be supported.

Figure 8: Overarching Objectives of the Kerry County Council Local Authority Climate Action Plan 2024-2029

3.5.2 Kerry County Development Plan 2022-2028.

Chapter 2 of the County Development Plan deals specifically with Climate Change & Achieving a Sustainable Future. Section 2.6.2.1 (Transition to a Carbon Neutral Economy and Society) states:

‘The Council will facilitate the provision of a framework, and work with all stakeholders for action on decarbonisation across all sectors including agriculture, transport, electricity, and the built environment..... The council, in conjunction with stakeholders will facilitate low-carbon and renewable energy generation (electricity and heat) technologies. The plan is also supportive of improved energy efficiency projects and initiatives.’

Section 2.6.2.2 Energy Policy and Planning states:

Kerry County Council recognises that the transition to a low carbon economy is an integral part of Ireland's climate change strategy and that renewable energies form a core component of reducing our reliance on fossil fuels. In particular, decarbonisation of the heating and transport sectors are challenges of significance to this plan..... National renewable energy targets are acknowledged and to date, Kerry has made a significant contribution towards realising these targets, having regard to wind energy developments already constructed and permitted in the County. Detailed policy in relation to renewable energy including micro generation and community consultation is contained in Chapter 12 of this plan. In addition, the plan facilitates the development of offshore wind energy proposals and associated 'green' industry.'

Section 2.6.4 (Summary of Mitigation and Adaptation Measures Incorporated into the Plan) identifies one of the mitigatory measures in this plan as

'Promoting repowering of windfarms, renewable energy technologies, spin off industry and enterprise,'

Chapter 9 deals with Economic Development. Section 9.3 (Sustainable Economic Development and Climate Action) states:

'Kerry County Council recognises the need for a 'Just Transition' to a low carbon economy which can offer significant opportunities to achieve sectoral diversification in the Green Economy and lead the way to a greener future including the following:

- *Support the development of the green economy including appropriate renewable energy and bioenergy economic developments that will assist in reducing greenhouse gas emissions and assist with the transition to a low carbon economy.'*

It should also be noted that Objective KCDP 9-3 sets out that it is an objective of the Council to:

'Facilitate and support training, upskilling and employment opportunities for rural communities in areas such as renewable energy, sustainable tourism, energy retrofitting, the Bioeconomy and the Circular Economy.'

Chapter 11 deals with the Environment and Section 11.6 Landscape states:

'The landscape has an important public interest role in the cultural, ecological, environmental and social fields, and constitutes a resource favourable to economic activity and whose protection, management and planning can contribute to job creation; contributes to the formation of local cultures and is a basic component of the European natural and cultural heritage, contributing to human well-being and consolidation of the European identity; is an important part of the quality of life for people everywhere: in urban areas and in the countryside, in degraded areas as well as in areas of high quality, in areas recognised as being of outstanding beauty as well as everyday areas; is a key element of individual and social well-being and its protection, management and planning entail rights and responsibilities for everyone' (European Landscape Convention, 2000).'

Section 11.6.3.1 Visually Sensitive Areas states:

‘Visually sensitive landscape areas comprise the outstanding landscapes throughout the County which are sensitive to alteration. Rugged mountain ranges, spectacular coastal vistas and unspoilt wilderness areas are some of the features within this designation.

These areas are particularly sensitive to development. In these areas, development will only be considered subject to satisfactory integration into the landscape and compliance with the proper planning and sustainable development of the area.

The County enjoys both a national and international reputation for its scenic beauty. It is imperative in order to maintain the natural beauty and character of the County, that these areas be protected.’

Section 11.6.4 Development in Designated Areas states:

‘Visually sensitive landscapes are particularly notable by virtue of their scenic and visual quality and offer significant opportunities for tourism development and rural recreational activities. The Council will seek to ensure that a balance is achieved between the protection of sensitive landscapes and the appropriate socioeconomic development of these areas. Development is not precluded in visually sensitive landscapes however, development proposals will be required to demonstrate that they integrate and respect the visual quality of the landscape.,

Section 11.6.5 Views and Prospects states:

‘County Kerry contains views and prospects of outstanding natural beauty which are recognised internationally. There is a need to protect and conserve these adjoining public roads throughout the County. Any development which hinders or materially affects these views/prospects will not be permitted.’

Objective KCDP 11-69 seeks to

‘Ensure that developments in upland areas provide sufficient storm water attenuation to avoid the occurrence of river erosion or flooding downstream subject to hydrological and ground/peat stability assessments.’

Objective KCDP 11-79 seeks to

‘Preserve the views and prospects as defined on Maps contained in Volume 4.’

Objective KCDP 11-80 seeks to

‘Facilitate the sustainable development of existing and the identification of new Viewing Points along the route of the Wild Atlantic Way in conjunction with Fáilte Ireland, while ensuring the protection of environmental attributes in the area through the implementation of environmental protection objectives, standards and guidelines of this Plan.’

KCDP 11-81 seeks to

‘Prohibit developments that have a material effect on views designated in this plan from the public road or greenways towards scenic features and/or public areas.’

Chapter 12 deals with Energy and Section 12.5 Renewable Energy states:

‘The Council will continue to support and facilitate the sustainable development of the renewable energy sector in line with the strategic goals set out by the Department of

Communications, Climate Action and the Environment whilst balancing the need for new development with the protection of the environmental, cultural and heritage assets of the county.'

Section 12.5.4.1 Wind Energy states:

'It is the policy of the Council to support, in principle and in appropriate locations, the sustainable development of wind energy resources in County Kerry.'

Section 12.5.4.1.7 Repower Areas states

'As wind turbine technology continues to advance, existing windfarms and sites developed today have the potential to greatly increase efficiency and capacity by upgrading older turbines with more efficient technology or their replacement with larger capacity turbines in the future. For the purposes of this plan and related development objectives, repowering includes wind farm upgrades, renewal, repowering or extension to permitted operational duration...'

'Repowering proposals differ from new applications in so far as they may be able to avail of the existing infrastructure and accordingly may not result in direct habitat loss of value within Hen Harrier SPAs. It is further noted that some windfarms in the SPA predate the European Site designation. Nonetheless, repowering proposals may still require grid upgrade works and / or transport upgrade works if taller turbines with greater capacity are proposed. In addition, displacement effects resulting from the unavailability of otherwise suitable habitat may still arise, as may disturbance risks (particularly during the construction stage) and collision risks (at the operational stage)...'

Objective KCDP 12-14 seeks to

'Maximise the development of all renewable energies at appropriate locations in a manner consistent with the proper planning and sustainable development of the County.'

Objective KCDP 12-15 seeks to

'Support and facilitate proposals for hybrid energy systems and/or co-location of renewable energy where applicable where such development has satisfactorily demonstrated that it will not have adverse impacts on the surrounding environment.'

Objective KCDP 12-16 seeks to

'Facilitate and promote sustainable alternative forms of renewable energy including hydro, bio, solar, geothermal and off-shore wind energy.'

Objective KCDP 12-18 seeks to

'Ensure that projects shall be designed and developed in line with the Draft Revised Wind Energy Development Guidelines (DHPLG, 2019) and any update of these guidelines in terms of siting, layout and environmental assessment.'

Objective KCDP 12-21 seeks to

(a) Facilitate the sustainable replacement of turbines or repower energy projects in areas shown as 'Repowering areas' and areas 'Open-to-Consideration'. Such proposals will be

required to comply with Article 6 of the Habitats Directive.

(b) Ensure that repowering proposals within or in proximity to SPAs designated for Breeding Hen Harrier shall not result in insufficient habitat for the Hen Harrier in line with the conservation objectives of the SPA. As part of this re-powering, proposals will not be permitted to result in the taking out of additional Hen Harrier foraging habitat within the SPA.

(c) Ensure that all mitigation measures outlined in a Natura Impact Statement, submitted in support of Repowering proposals within or in proximity to SPAs designated for Breeding Hen Harrier shall be certain beyond all reasonable scientific doubt and shall be supported by robust evidence including at least 2 years of annual ornithological survey work.

(d) Ensure that repowering proposals within or in proximity to SPAs designated for Breeding Hen Harrier do not constitute an unacceptable collision risk to Hen Harrier. As part of this, early engagement with statutory and non-statutory holders of ecological data should be undertaken, including with the Irish Hen Harrier Winter Survey.

3.5.3 Kenmare Municipal District Local Area Plan 2024-2030.

This plan became effective from May 24th 2024. The LAP supports measures to cut emissions in line with national targets, particularly in the key areas of transport and the built environment. This aligns with local targets as they evolve in Kerry's Local Authority Climate Action Plan to be adopted in 2024.

A Climate Action Audit was carried out for this LAP and provides more detail on how the Plan aligns with climate action policy. It sets out that the LAP promotes the development of appropriately scaled renewable energy installations.

3.5.4 Kerry County Council's Climate Change Adaption Strategy Sept. 2019-2024

This strategy identifies specific challenges to be faced by Kerry County Council from climate change. The strategy includes objectives and corresponding actions on how the council will adapt to these challenges. In relation to Land Use and Development, sustainable policies and measures are devised and implemented to influence positive behavioural changes, support climate adaptation actions and endorse approaches for successful transition to a low carbon and climate resilient society.

3.6 Policy Summary

European, National, Regional and Local policy recognises the need for greater security of energy supply and competition in the Irish context. Local Planning Policy in particular, has designated a number of existing wind energy sites as repowering areas within which the replacement of existing wind energy farms may be favorably considered.

4.0 European, National and Local Designations.

4.1 European Designations, Natural Heritage Areas, which may be affected by the proposed development (whether in or proximate to same).

The designated Natura 2000 sites found adjacent to the proposed development include:

- Killarney National Park, Macgillicuddy Reeks and Caragh catchment cSAC (3.3km)
- Old Domestic Building Curraglass Wood (6kmO)
- Kilgarvan Ice House (7km)
- St Gobnet's Wood (9.4km)
- Glanlough Woods (11km)
- Blackwater (Cork/Waterford) (11.5km)
- Mullaghanish Bog (11.9km)
- Derryclogher Bog (12.9km)
- Kenmare River (c.20km)
- Mucksna Wood (c.20km)
- Mullaghareirk to Musheramore mts (10.2km)
- Killarney National Park (12km)

The following Natural Heritage Areas / proposed Natural Heritage Areas are also located within or adjacent to the site:

- The Roughty River pNHA located 2.5km south west of the application site.
- Sillahertane Bog NHA located 3km south of the application site.

4.2 Protected Structures and Architectural Conservation Areas (ACA's).

There are no protected structures or architectural conservation areas within or adjacent to the proposed development site.

4.3 Archaeological Monuments and Sites.

There are 6 no. monuments listed within the subject site boundary as indicated on the table below:

SMR No.	Class	Townland	ITM E	ITM N	Turbine ID	Distance to nearest turbine (m)
KE085-050	Hut site	Inchincoosh	506731	577332	T7	150

SMR No.	Class	Townland	ITM E	ITM N	Turbine ID	Distance to nearest turbine (m)
KE085-051	Hut site	Inchincoosh	506715	577333	T7	165
KE085-052	Hut site	Inchincoosh	506689	577334	T7	189
KE086-012	Building	Inchee	508833	576635	T8	405
KE085-053001	Megalithic tomb - unclassified	Lettercannon	507646	575845	T11	238
KE085-053002	Hut site	Lettercannon	507646	575845	T11	238

Table 2 – List of Monuments within the subject site

Three new archaeological / cultural heritage features were noted within the existing Lettercannon section of the Proposed Development. They are located adjacent to existing roads which were built as part of the Lettercannon windfarm. Indicated on the table below:

CH No.	Class	Townland	ITM E	ITM N	Distance to nearest existing turbine (m)	Distance to nearest proposed turbine (m)
CH 1	Hut / House	Lettercannon	507552	575666	230m to T12 (Lettercannon)	430m to T11
CH 2	Hut site	Lettercannon	507568	575664	230m to T12 (Lettercannon)	430m to T11
CH 3	Hut site	Lettercannon	507555	575881	116m to T12 (Lettercannon)	294m to T11

Table 3 – List of archaeological / cultural heritage features within the subject site

4.4 Special Area Amenity Order.

There is no designated SAAO (Special Area Amenity Order) on site.

4.5 Kerry County Development Plan 2022-2028 Visually Sensitive Areas.

The site is located in an area designated as Visually Sensitive in the Kerry County Development Plan 2022-2028.

5.0 Assessment on the effects of the proposed development on the environment and the proper planning and sustainable development of the area.

5.1 Introduction

It is noted that an existing windfarm is already in situ on the current site. Within this context it is considered that the most pertinent issue relates to the principle of the proposal within the context of land use policy, climate change and energy security. As required by S37 of the Planning and Development Act as amended this assessment is particularly focused on the proper planning and sustainable development of the area. Section 6 contains additional observations regarding the submitted NIS and EIAR.

5.2 Principle of Development

The principle of development has been established through the provision of the existing windfarm(s), which have been lawfully established on site. The repowering of this existing windfarm is in line with Objective KCDP 12-21, which seeks to *(a) Facilitate the sustainable replacement of turbines or repower energy projects in areas shown as 'Repowering areas' and areas 'Open-to-Consideration'.* Such proposals will be required to comply with Article 6 of the Habitats Directive.

5.3 Visual Impact and Landscape Assessment.

The proposed development seeks to remove 28 no. existing turbines and relevant ancillary infrastructure and replace them with 11 no. wind turbines with a blade tip height range from 199.5m to 200m, a hub height range from 118m to 125m and a rotor diameter range from 149m to 163m, along with associated foundations and hard standing areas.

The proposed application site is within the line of sight of Protected Views and Prospects from the R569 regional road to the west, the L3201 local road to the south and the N22 to the north east of the application site. These roads have views to the east, north and southwest over the application site, which contains an existing windfarm.

The Zone of Theoretical Visibility (ZTV) maps submitted with this application clearly illustrate that the proposed turbines will be visible over a very wide area. Figure 13-3 in chapter 13 of the EIAR an Existing Vs Proposed Comparative ZTV. It demonstrates that there are certain locations in the wider area where only the existing turbines are theoretically visible, that there are certain locations in the wider area where only the proposed turbines are theoretically visible and finally that there are certain locations in the wider area where both the existing and proposed turbines are theoretically visible. In summary the ZTV maps submitted indicate that the difference to the Zone of Theoretical Visibility between the existing windfarm and the proposed turbines is minimal.

The photomontages submitted have been analysed and give a general impression of how the new turbines will be viewed from the surrounding area, when compared against the existing windfarm. It should be noted that the photomontages submitted give two wind turbine options. These are as follows:

- 122.5m Hub Height & 155m Rotor Diameter (Option 1)
- 125m Hub Height & 149m Rotor Diameter (Option 2)

The issue of turbine dimensions proposed has been discussed in section 1.5 (project overview) of this report. In terms of visual impact, the difference between the two options is marginal.

Viewpoint 1 from the N22 national road in the townland of Inch shows that the proposed new turbines will be more dominant than the existing turbines when viewed from this stretch of the main Cork/Kerry Road. While it is noted that the proposed turbines are discernibly more

dominant, it is considered that the difference between option 1 and option 2 is not significantly noticeable from the photomontages submitted.

Viewpoints 2 and 8 of the proposed development are from the CDP Protected View/Prospect along the L3201 to the south of the subject site shows that the proposed new turbines will be less dominant than the existing turbines when viewed from various points along this local road. The number of turbines visible at this location has significantly reduced from 15 existing turbines to 6 proposed turbines at viewpoint 2 and from 7 existing turbines to 3 proposed turbines at Viewpoint 8. It is considered that the proposed development reduces the visual clutter at these locations and is an improvement on the existing windfarm when viewed from these 2 points along this Protected View/Prospect. As with viewpoint 1, it is considered that the difference between option 1 and option 2 is not significantly noticeable from the photomontages submitted.

Viewpoint 3 of the proposed development is from Kilgarvan Village along the R569 Regional Road shows that the proposed new turbines will more dominant over the existing landscape given the increased height of the new turbines, but there is a clear and noticeable reduction in visual clutter in terms of the proposed reduction in the number of turbines, when viewed from this location. While the new turbines are more visible, on balance, it is considered that the proposed turbines when viewed from this location, due to a reduction in number, do not impact on visual amenity any more than the existing windfarm.

Viewpoint 9 of the proposed development is from the CDP Protected View/Prospect along the R569 regional road to the west of the subject site. This montage shows that the proposed new turbines would be marginally more visible than the existing turbines when viewed from various points along this regional road. There are currently no turbines visible from this location. Under the current proposal, the blades from proposed turbine 10 would be partially visible from this location. It is considered that the current proposal, with the blades of one turbine being visible at this location would not significantly detract from this protected view/prospect at this location.

Viewpoint 11 of the proposed development is from a County Cork Designated Scenic Route SR22 in the townland of Coomnaclohy, to the east of the subject site. This montage shows that the proposed new turbines would be marginally more visible than the existing turbines when viewed from various points along this route. The existing turbines can be partially seen given the topography of the surrounding landscape. The proposed turbines would also be partially visible, however due to a reduction in number, the difference between the existing and proposed wind turbines is marginal.

Visual Impact and Landscape Assessment Summary.

Having regard to the number, size and scale of the 11 no. proposed turbines to replace the 28 no. existing turbines, it is considered that as per the zone of theoretical visibility and the photomontages submitted, the reduction in the number of wind turbines would make a positive impact, reducing visual clutter and providing clear differentiation between the wind turbines and the landscape that they occupy.

As such and on balance, it is considered that the proposed wind turbines would not have a significant negative visual impact on the landscape and would not materially affect protected views and prospects.

The proposed development if permitted would be in line with current repowering policy in the County Development Plan as well as local regional and national policy in relation to the promotion of renewable energy generation.

5.4 Roads and Transport

An assessment of the traffic effects on the local road network was undertaken for the Proposed Development. The assessment considers the likely impacts resulting from the additional traffic movements that will be generated by the Proposed Development during the construction, operational and decommissioning phases on the transport delivery route to the site.

During this main part of the construction phase, based on the forecast increase in traffic volumes set out above it is forecast that the impact on the delivery routes will be negative, temporary and imperceptible. Once the Proposed Development is operational the traffic impact created by maintenance staff will be imperceptible. The residual effect for the decommissioning phase will be less than for the construction stage as set out above and will be slight to imperceptible.

The proposed development was reviewed by the area engineer and deemed acceptable subject to conditions being imposed on any grant of planning permission issued.

5.5 Flood Risk Management

The application was reviewed in terms of the risk of flooding associated with the proposed windfarm redevelopment. The proposal as detailed in the application will not increase the risk of flooding downstream of the development if all mitigation and monitoring measures relating to the pre-commencement, construction, operational and decommissioning phases of the proposed development as set out in the application and summarised in the Schedule of mitigation and monitoring proposals are implemented.

The Construction Environmental Management Plan (CEMP) outlines measures for the management of all surface water and run-off on the site, for the protection of watercourses and in particular, sediment and erosion control. These measures will need to be implemented in full and a robust monitoring and audit system put in place to ensure compliance with the developed CEMP and to ensure regular inspection, maintenance and repair of the drainage channels, settlement ponds, swales, dams, silt fences and outfalls.

Should the Bord grant permission the detailed design of the surface water drainage and management system and the developed CEMP should be updated prior to the commencement of construction to include all mitigations and monitoring measures, planning conditions and alterations to the EIAR.

The issues outline above can be resolved via recommended conditions to An Bord Pleanála.

5.6 Environment/Water Services

As outlined, the proposal is for the removal of 28 turbines with construction of 11 new turbines. Main issues to note from water quality aspect include:

- Removal of existing 28 turbines
- Construction of 11 turbines
- Underground cabling
- Upgrading existing tracks & hardstand areas
- Extension & re-use of existing borrow pit

- Temporary construction compounds
- Construction of meteorological masts
- Forestry felling of approx. 8.9 hectares
- Drainage works on site.

The Proposed Development site is located within 3 surface water catchments:

- 1) The Dunmanus-Bantry Kenmare surface water catchment;
- 2) The Laune-Maine-Dingle Bay catchment; and,
- 3) The Flesk River sub-catchment.

A total of 36 surface water grab samples were undertaken to determine the baseline water quality of the primary surface waters originating from the Proposed Development site. The monitoring and sampling completed in July 2022 occurred during a dry period with minimal rainfall. Meanwhile the sampling completed in January 2023 was preceded by a mixture of dry and wet days.

5.7 Noise and vibration.

All buildings within 3 km of the Proposed Development were identified. Of the 102 buildings identified, two were subsequently classified as derelict. These locations are not considered to be Noise Sensitive Receptors (NSR's) for the purposes of this part of the EIAR.

All NSRs are shown on EIAR Figure 12-2. For clarity a series of inset maps showing the individual numbering of the NSRs are also included as Figures A1.1a-b within Annex 1 of Technical Appendix 12-2 of the EIAR.

Predicted noise levels associated with the existing turbine removal and construction activities are below the guidelines considered acceptable at all receptors for all phases of the Proposed Development and therefore no significant effects are anticipated.

An additional comparison was made between predicted noise levels from the Existing Kilgarvan Wind Farm turbines, and those turbines associated with the Proposed Development at 14 Noise Assessment Locations (NAL's). The comparison showed that the predicted output of the Proposed Development will be lower at each of the NALs than the Existing Kilgarvan Wind Farm turbines.

Whilst it is not possible to predict if aerodynamic noise from the proposed wind turbines will occur, potential mitigation measures to reduce this possibility have been identified and the developer is proposing to appoint a community liaison officer with a commitment to investigate complaints which may relate to same. However, the detail of appropriate mitigation to be adopted can only be determined once the wind farm is operational, In the event that frequent and sustained aerodynamic noise from the proposed wind turbines is identified, suitable mitigation will be implemented and therefore no significant effects are likely.

5.8 Shadow flicker.

All sensitive receptors within 2km of the EIAR Site Boundary were identified and mapped. This included all occupied and unoccupied dwellings. In addition, a planning history search to identify properties that may have been granted planning permission, but not yet been constructed, was carried out. Any property with a valid planning permission for a dwelling house was also added to the sensitive receptors' dataset.

The study area for the shadow flicker assessment is ten times rotor diameter from each turbine as set out in the Guidelines. All residential properties located within ten rotor diameters which is assumed to be 1.63 kilometres at its largest extent, have been included in the assessment. A significant minimum separation distance of 1,269m from third party dwellings has been achieved with the project design, thus exceeding the necessary setback distance. There are 14 No. properties located within 1.63 kilometres of the proposed turbines as detailed above, of which 4 no. properties are involved. The shadow flicker study area and sensitive receptor locations are shown in Figure 5-6.

In relation to Shadow Flicker, it is noted the proposal adheres to the guidance of the Wind Energy Development Guidelines, 2006 (2006 WEDGs) and are discussed further in Chapter 12 and Chapter 5 of the EIAR, respectively.

Where exceedances are experienced, suitable mitigation measures are outlined in Chapter 5 of the EIAR which will be employed at the potentially affected properties to ensure that the limits set out in the 2006 WEDGs are not exceeded at any dwelling within the Shadow Flicker Study Area. It is also noted that the proposed wind turbines can be brought in line with the requirements of the Draft Revised Wind Energy Development Guidelines (2019 Draft WEDGs) should they be adopted while this application is in the planning system, through an alteration of the implementation of the mitigation measures outlined.

Furthermore, the proposed turbine locations adhere to the recommended 500m set back distance in the 2006 WEDGs and also the 4 times tip height set-back distance (for non-involved Sensitive Properties) set out for visual amenity purposes, prescribed by the 2019 draft WEDGs.

The assessment carried out as part of the EIAR is also based on compliance with the 2019 draft guidelines to ensure that no existing dwelling or other affected property will experience shadow flicker as a result of the wind energy development.

Chapter 5 of the submitted EIAR states:

“...it is noted that the Proposed Development will not result in any significant effects on Human Beings in the area surrounding the Proposed Development. Following appropriate mitigation, as per the draft Guidelines there will be no daily or annual shadow flicker exceedances at any dwelling within 2 km of the Proposed Development.

Provided that the Proposed Development is constructed and operated in accordance with the design, best practice and mitigation that is described within this application, significant effects on population and human health, associated with health and safety, noise, dust, traffic and shadow flicker, are not anticipated.”

Overall, the Proposed Development has been designed in accordance with the 2006 WEDGs and the 2019 draft WEDGs. In this regard the EIAR submitted with the planning application considers all relevant potential environmental impacts that could arise, and the design of the Proposed Development has followed the design principles established in both the 2006 WEDGs and the 2019 draft WEDGs.

5.9 Archaeological, Architectural and Cultural Heritage.

The application in respect of the repowering of the Kilgarvan Windfarm is accompanied by a detailed EIAR, part of which (Chapter 14) deals with Cultural Heritage including archaeology. The EIAR notes that there are 8 archaeological monuments or features within the development

site, 5 monuments listed in the Record of Monuments & Places and/or Sites and Monuments Record:

KE085- 051 Hut site Inchincoosh 506715 577333 T7 165

KE085- 052 Hut site Inchincoosh 506689 577334 T7 189

KE086- 012 Building Inchee 508833 576635 T8 405

KE085- 053001 Megalithic tomb - unclassified Lettercannon 507646 575845 T11 238

KE085- 053002 Hut site Lettercannon 507646 575845 T11 238

And a further three monuments which were recorded during archaeological assessment/monitoring as part of previous windfarm planning applications within the site:

CH 1 Hut / House Lettercannon 507552 575666

CH 2 Hut site Lettercannon 507568 575664

CH 3 Hut site Lettercannon 507555 575881

The EIAR notes that while none of the monuments will be directly impacted by the proposed development there is a potential for a number of the monuments/features to be damaged during the proposed works, particularly during the decommissioning of existing turbines. The EIAR states that this is particularly true in relation to:

KE086- 012 Building Inchee 508833 576635 T8 405

KE085- 053001 Megalithic tomb - unclassified Lettercannon 507646 575845 T11 238

KE085- 053002 Hut site Lettercannon 507646 575845 T11 238

CH 1 Hut / House Lettercannon 507552 575666

CH 2 Hut site Lettercannon 507568 575664

CH 3 Hut site Lettercannon 507555 575881

In the case of these six monuments/features the EIAR recommends that the monuments are fenced off during construction work to protect against accidental damage and this mitigation is appropriate.

The EIAR notes that much of the existing infrastructure will be reused but there will still be a need to construct new roads, turbine bases, cabling ducts/trenches, hardstands, drainage works, compounds etc. The EIAR outlines the potential for the survival of sub-surface monuments/features and artefacts and proposes that all excavations/ground works in previously undisturbed areas of the site will be archaeologically monitored. This monitoring will be carried out under licence from the National Monuments Service and reports will be submitted to the planning authority and the NMS on completion. Again, this mitigation is appropriate.

The proposed mitigation measures outlined in the EIAR are appropriate and address the identified direct and potential impacts on the recorded and potential archaeology of the development site.

There are no Protected Structures on site.

6. EIAR/NIS Observations

The Bord may wish to take the following observations on the submitted Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) into consideration:

General Observations

While it is noted that the planning history of the site is outlined in the planning report submitted, it does not appear to have been indicated if there are limits to the duration of consent for the operation of the existing turbines or if they enjoy the at least theoretical benefit of operating in perpetuity. This information would have been useful, to more fully establish the ‘baseline’ and the ‘Do -Nothing Scenario’. The do-nothing scenario is set out in S6.5.2 of the EIAR, however this does not discuss impacts on Terrestrial Ecology as could result from this scenario – positive or negative.

Notwithstanding the above, this assessment will be undertaken on the ‘worst case scenario’ basis i.e that the existing turbines have a limited operational duration after which the site would have been restored.

6.1 Birdlife

Potential for impact on birdlife and in particular the white-tailed eagle is considered to be an important consideration for this proposal. The field survey constraints and limitations as set

out in S6.4.7 of the EIAR are noted. It is considered that the information collected and submitted is sufficiently detailed and extensive to allow for impact assessment.

Potential operational disturbance / displacement of birdlife is assessed within S6.5.5.5.1 of the EIAR. As part of this, it is outlined that there is low likelihood of any significant change in the pattern of usage of the site post-construction. This is accepted however as outlined previously it does not provide details on the alternative ‘do nothing’ scenario associated with site restoration.

It is noted that in the interest of breeding birds, ‘construction will not commence during the Breeding Bird season from April to July inclusive. Construction may commence at any stage from August onwards to the end of March, so that construction activities are ongoing by the time the next breeding bird season comes around and can continue throughout the next breeding season’. This is considered to be acceptable.

It is also noted and considered appropriate that the proposal has been informed by observed avian flightlines as described and mapped in Appendix 6-2 of the EIAR. It is further noted and welcomed that a ‘white-tailed eagle outline risk management plan’ has been prepared for the proposal and is included as appendix 6.9 of the EIAR. It is noted that this has taken account of the mitigation to prevent eagle mortality as agreed for the existing Grousemount Wind Farm and which is required by the Kerry CDP 2022-2028. This approach is considered to be acceptable. The EIAR outlines that a suitably qualified ornithologist will be appointed to develop and oversee the implementation of the finalised white-tailed eagle risk management plan – which is considered to be appropriate.

6.2 Aquatic interests

While the proposal seeks to utilise existing internal roadways, it is nonetheless considered important that sufficient storm water attenuation is provided so as to avoid the occurrence of river erosion or flooding downstream, as is required by KCDP development objective 11-69. This attenuation should preferably be provided by way of nature-based-solutions e.g. leaky dams, ponds. This is of more relevance now than when the previous applications were permitted, due to recognition of increased likelihood of intense rainfall events associated with climate change.

Sensitive salmonid watercourses are located downstream. It is noted that a peat management plan has been submitted as part of the proposal, which is considered appropriate. As part of this, a safety buffer zone has been identified in the Peat Stability Risk Assessment (PSRA) Appendix 8-1. Similarly stockpile restriction areas are outlined in Appendix A.2 Figure A-2-1 to Figure A-2-3 of the PSRA).

Responsibility for implementation and monitoring of water quality related mitigation measures should be clearly identified and should be overseen by a suitably qualified person/team.

6.3 Lesser Horseshoe Bat

The proposal is located outside of core sustenance zones identified for protection in the conservation objectives for LHB associated with European Sites in the vicinity. There is no potential for impact on LHB related conservation objectives.

6.4 Habitat loss / Blanket bog / site rehabilitation

Habitat value is generally greater towards the west of the wind farm site, where areas of wet heath, outcropping rock, blanket bog and dry heath habitats are present. It is noted that a Blanket Bog Rehabilitation and Management Plan is proposed to rehabilitate/restore an area of blanket bog (c.5.5ha), which has previously been partly drained and planted with conifers, in order to mitigate for the loss of blanket bog and heath habitats as a result of the Proposed Development. The proposed works include the felling of coniferous forestry and drain blocking which will be completed during the construction phase of the Proposed Development.

The application outlined that peat material will be used to reinstate around the existing hardstands which are not proposed to be replaced with new turbines, with an assumed thickness of 0.5m. Site rehabilitation works along the access roadways which would no longer be required by the windfarm does not appear to be proposed.

It is noted that S3.2 of the 'Blanket Bog Rehabilitation and Management Plan' outlines monitored requirements, including monitoring of habitat restoration and revegetation of decommissioned areas of the Existing Kilgarvan Wind Farm, including the borrow pit. As part of this status reports are to be submitted to NPWS and KCC.

6.5 Decommissioning

The EIAR outlines that a decommissioning plan will be agreed with Kerry County Council prior to decommissioning of the Proposed Development. An (outline) Decommissioning Plan is included as Appendix 4-5 of the EIAR. As part of this plan, the importation of soil is provided for to be spread and graded over the turbine foundations. Invasive species management protocols are also outlined.

6.6 European Sites

The Site Boundary does not lie within any EU Natura 2000. The closest Natura 2000 site is Killarney National Park, Macgillycuddy's Reeks & Caragh River Catchment SAC (000365) is located within 0.1km of the entrance from the public road at Cloonkeen. The nearest of the proposed turbines is 1.6km from this SAC. The main risks to the SAC from the proposal are water quality related. Old domestic building, Curraglass Wood SAC 002041 is located c. 2.8km over-land to EIAR Site Boundary. The proposal is located outside of core sustenance zones identified for protection in the conservation objectives for Lesser Horseshoe Bat (LHB) associated with this and other European Sites in the vicinity. There is no realistic potential for impact on LHB related conservation objectives. Mullaghanish to Musheramore Mts. SPA 004162 is c. 7.8km over-land to EIAR Site Boundary with the nearest turbine being c.10km to the SPA. This SPA is designated for breeding Hen Harrier. There is no realistic potential for impact on the conservation objectives of the SPA.

6.7 Overall conclusion

Having regard to the information submitted, significant adverse impacts on biodiversity interests based on existing conditions are not anticipated.

7.0 Assessment of Adequacy and Conclusions of the EIAR submitted.

A considerable amount of ecological surveys and assessments have been undertaken, in support of the proposal. It is evident that the proposal has had regard to the requirements of the Kerry CDP 2022-2028 and that the requirements of same along with the ecological findings have influenced the proposal, including the proposed provision of an outline White-tailed Eagle Risk Management Plan - which is considered to be appropriate. It is noted that the reports submitted

conclude that the proposal is compatible with the requirements of the Habitats Directive. In the interests of clarity, biodiversity and the proper planning and sustainable development, a number of recommended conditions have been outlined.

8.0 Conclusion

While Government policy recognises the need to transition to a zero-carbon economy by 2050, it also recognises that the realisation of renewable energy resources to achieve this target will involve a transitional period. These policy matters and their relevance to the assessment of the project are a matter for the Bord.

The planning application is supported by comprehensive information including mitigation measures by means of the Environmental Impact Assessment Report and Natura Impact Statement. The environmental studies and assessments completed including the mitigation measures proposed demonstrate that the development would not have a significant effect on the environment or on the residential amenity of the area. However, the Planning Authority has included in section 6 a number of observations on the submitted EIAR and NIS that the bord may wish to take into consideration.

The roads, water and in particular the energy infrastructure serving and adjacent to the application site is adequate to cater for the proposed development.

The proposed development accords with National and Regional policy as set out in the National Planning Framework and the Regional and Spatial Economic Strategy for the Southern Region. The proposed development aligns with the goals and objectives of the Kerry County Council Local Authority Climate Action Plan 2024-2029 and is consistent with the land use zoning and objectives contained in Kerry County Development Plan and the Kenmare Municipal District Local Area Plan and is in accordance with the proper planning and sustainable development of County Kerry.

In order to offset any potential impact of a renewable energy development on the community it is the policy of Kerry County Council to seek the developers to provide support to local communities by providing resources for Community Benefit Funds. It is considered reasonable that renewable energy developments contribute to the community within a 20km radius of the development site within the county, at a rate of €2/MWh. An appropriate condition should be attached to any consent issued in this regard.

9.0 Matters to consider in relation to any decision

Kerry County Council requests An Bord Pleanála to consider the following items in making a decision on this application.

9.1 General

- (i) All environmental mitigation measures as set out in the information submitted in support of the application, including within the EIAR and the NIS shall be fully implemented, except as may be otherwise required or specified by way of condition.

Reason: In the interests of clarity and the proper planning and sustainable development of the area.

9.2 Environmental Protection

- (i) The developer shall appoint a full-time, appropriately qualified environmental manager for the duration of the construction and development phases of the project. This person will be responsible for ensuring that all environmental control measures are fully implemented and maintained, and will also act as the point of contact with the Planning Authority in the event of any environmental difficulties arising with the project. Contact details of the person in question shall be provided to the Planning Authority prior to any works commencing on-site.
- (ii) In advance of any works commencing on-site the developer shall prepare and submit a Construction Environmental Management Plan (CEMP) for approval by the Planning Authority. The CEMP shall cover all relevant environmental issues potentially associated with the development phase of the project, including air quality, noise control, water management, waste management etc.
- (iii) No silt/sediment laden water shall be discharged from the development to any watercourse in the vicinity of the site. In this regard, during the development phase of the project, a suitable system for the collection and treatment of any sediment/siltation arising shall be installed on-site and maintained thereafter for the duration of the development works.
- (iv) Bunds shall be installed around all temporary oil-containment facilities and the developer shall ensure that no oil, grease or other objectionable matter is discharged into any drain or watercourse.

Reason: In the interests of clarity, environmental protection and the proper planning and sustainable development of the area.

9.3 Biodiversity

- (i) A Blanket Bog Rehabilitation and Management Plan and a White-tailed Eagle Risk Management Plan shall be provided as outlined in the plans and particulars submitted as part of the planning application.

Reason: In the interests of biodiversity and the proper planning and sustainable development of the area.

9.4 Construction Management Plan

- (i) The construction of the development shall be managed in accordance with a Construction Management Plan, which shall be submitted to, and agreed in writing with, the Planning Authority prior to commencement of development. This plan shall include all environmental and ecological measures arising from reports submitted with the planning application and shall provide details of intended construction practice for the development, including:
 - (a) The location of the site and materials compound(s) including area(s) identified for the storage of construction refuse.
 - (b) The location of areas for construction site offices and staff facilities.
 - (c) Details of boundary treatment, site security fencing and hoardings.
 - (d) Details of on-site car parking facilities for site workers during the course of construction.
 - (e) Details of a monitoring and audit system to be put in place to ensure compliance with the developed CEMP and to ensure regular inspection, maintenance and repair of the drainage channels, settlement ponds, swales, dams, silt fences and outfalls.

Reason: In the interest of clarity, environmental protection and the proper planning and sustainable development of the area.

9.5 Roads and Transportation

- (i) Works adjacent to the Public Road shall not affect the surface water drainage regime of the public road and no surface water within the development shall be allowed to flow onto the public road.
- (ii) The formation of the existing splayed entrance shall not interfere with the roadside drainage, which shall be maintained, repaired or made good by providing a dished channel constructed of concrete or piped culvert.
- (iii) The applicant must make good any damage cause to the public road because of their works to the satisfaction of the Kerry County Council Roads Engineer.
- (iv) All works adjacent to or on the public road shall require a road opening licence approved by the Roads & Transportation Directorate. The approval of this licence will be subject to the developer / contractor possessing the adequate level of insurance which indemnifies Kerry County Council. The developer / contractor will furthermore have to produce a company safety statement along with a site-specific safety plan. The site-specific safety plan shall include a site-specific risk assessment and a traffic management plan.
- (v) The applicant shall institute appropriate measures to prevent material being drawn from the site onto the public road. No earth, soil or other material from this site shall be drawn or deposited onto the public road. Wheel washes shall be installed during the construction phase to prevent construction vehicles and plant from depositing debris and dirt on the public road.
- (vi) All vehicles during construction phase of this proposed development must be parked within the site.

- (vii) During the Construction and Delivery Phases, suitable Advance Warning Signage shall be provided as appropriate on the approaches to entrance to the Windfarm, to the satisfaction of the Road Authority and always maintained in satisfactory condition during the Construction and Delivery phases. The signage shall be clearly legible from the public roadway at the entrance to the site and shall be maintained to not be obscured or rendered illegible by dust, mud or vegetation. This signage should design and located in accordance with the Traffic Signs Manual.
- (viii) The delivery times and haulage routes to be agreed in advance with the Road Authorities and An Garda Síochána.

Reason: In the interest of road safety and the proper planning and sustainable development of the area.

9.6 Water Services

- (i) Detailed design of the surface water drainage and management system and the developed CEMP should be updated prior to the commencement of construction to include all mitigations and monitoring measures, planning conditions and alterations to the EIAR and must be submitted to the Planning Authority for written approval prior to the commencement of development.

Reason: In the interests of clarity, environmental protection and the proper planning and sustainable development of the area.

9.7 Environment Department

- (i) The Run off control and drainage management proposals submitted with this application shall be fully implemented.
- (ii) Runoff from access tracks, turbine bases, and developed areas (construction compounds, met masts) will be collected and treated in local (proposed) silt traps and settlement ponds/swales and then discharged over buffered outfalls. Runoff from the decommissioned areas will be treated in local swales before being discharged over buffered outfalls.
- (iii) The surface water sampling regime highlighted and proposed in the Environmental Impact Assessment submitted with the application shall be fully implemented. The sampling regime will be agreed with the relevant local authority in advance.
- (iv) The developer shall appoint a full-time, appropriately qualified environmental manager for the duration of the project. This person would be responsible for ensuring that all environmental control measures are fully implemented and maintained, and would also act as the point of contact in the event of any environmental difficulties arising with the project.
- (v) No polluting matters including sediment laden waters shall be discharged directly or indirectly to any waters from the proposed works including the felling operations. Suitable measures shall be put in place onsite in advance of any demolition works to prevent sediment laden waters entering any waters. The ongoing management of these measures is critical.
- (vi) The developer shall ensure that proven forestry best practice methods are used to mitigate the risk of release of sediments/suspended solids to any water course/surface

drain during the felling and ground works operations on site for the duration of the proposed development.

- (vii) In the event of complaints being received regarding alleged noise nuisance from the proposed rock breaking or borrow pit excavations and construction phase of this development to which this permission relates and, upon investigation by Kerry County Council, such complaints are found to be justifiable the applicant shall, upon written receipt of notification from the Planning Authority, retain the services of an acoustic specialist to establish the cause of the noise or nuisance and the remediation measures required in order to abate said nuisance. The applicant shall ensure that all such measures are fully implemented and shall be liable for all costs incurred therein.
- (viii) If deemed necessary by the Planning Authority, the applicant shall carry out ambient noise monitoring at locations adjacent to the site during the demolition and construction phase of the development. The scope of the monitoring shall be agreed in advance with the Planning Authority.
- (ix) Settlement ponds shall be designed to suit each specific drainage catchment and the proposed settlement ponds at the borrow pit will be designed to ensure suitable effective retention.
- (x) The burning or burial of waste is prohibited at the site.
- (xi) Any and all hazardous waste/material generated at the site shall be taken directly to a suitably authorised waste facility or transfer to a suitably licensed waste collector.

Reason: In the interests of clarity, environmental protection and the proper planning and sustainable development of the area.

9.8 Archaeology related

- (i) The following archaeological monuments/features should be securely fenced off during construction and appropriate signage should advertise the presence of the monuments in order to avoid accidental damage. The fencing should be established and erected under archaeological supervision. No excavation, storage of materials or traffic of machinery should be permitted within these buffer zones
 - KE086- 012 Building Inchee 508833 576635 T8 405
 - KE085- 053001 Megalithic tomb - unclassified Lettercannon 507646 575845 T11 238
 - KE085- 053002 Hut site Lettercannon 507646 575845 T11 238
 - CH 1 Hut / House Lettercannon 507552 575666
 - CH 2 Hut site Lettercannon 507568 575664
 - CH 3 Hut site Lettercannon 507555 575881
- (ii) All soil/peat stripping, excavations and ground works in proximity to the identified archaeological monuments/features and in previously undisturbed areas of the proposed development site should be archaeologically monitored, under licence from the National Monuments Service. On completion of the monitoring reports outlining the results should be submitted to the planning authority and the NM

Reason: In the interests of archaeological conservation and the proper planning and sustainable development of the area.

9.9 Development levies

- (i) The developer shall pay to the planning authority a financial contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the Development Contribution Scheme made under section 48 of the Planning and Development Act 2000. The contribution shall be paid prior to the commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to any applicable indexation provisions of the Scheme at the time of payment. Details of the application of the terms of the Scheme shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to the Board to determine the proper application of the terms of the Scheme.

The value of the contribution outlined shall be agreed in writing, with the Planning Authority prior to commencement of construction of the development.

Reason: In the interests of orderly development.

9.10 Community Contribution Fund

Prior to commencement of development, details of the community gain proposals shall be submitted to, and agreed in writing, with the planning authority.

Reason: In the interests of the community and orderly development of the area.

9.11 Bond and allied matters

- (i) A Bond of €50,000 shall be placed on this development, to be used if required, to repair any damage to the public road because of this development.

Reason: In the interest of road safety, orderly development and the proper planning and sustainable development of the area.

Signed:

Paul Neary

Actg. Director of Services / Oifig Stiúrthóir Seirbhísí,

Planning, Environment & Emergency Management/Pleanáil, Comhshaol & Bainistíocht Éigeandála

Date: 10th July 2024

Appendix A Internal Consultations.

Internal consultations:

Internal consultations were carried out within Kerry County Council with the following individuals:

1. Dr. Michael Connolly, County Archaeologist.
2. Mr. Eoin Kelleher, Executive Planner & Ecologist.
3. Mick Boyce, Senior Executive Engineer, Environment Department.
4. Eoghan O'Brien, Senior Executive Engineer, Flooding & Coastal Protection Unit.
5. John Ahern, Senior Executive Engineer, Killarney Municipal District.

MEMORANDUM

Date/Dáta: 23rd May 2024.

To/Chuig: Damien Ginty,
Senior Planner

From/O: Michael Connolly
County Archaeologist

**Re/Le: Proposed Windfarm repowering Application of the existing
Kilgarvan Wind Farm in the townlands of Inchincoosh, Inchee,
Lettercannon, Coomacullen and Cloonkeen, Co.Kerry**

Damien,

The application in respect of the repowering of the Kilgarvan Windfarm is accompanied by a detailed EIAR, part of which (Chapter 14) deals with Cultural Heritage including archaeology. The EIAR notes that there are 8 archaeological monuments or features within the development site, 5 monuments listed in the Record of Monuments & Places and/or Sites and Monuments Record:

KE085- 051 Hut site Inchincoosh 506715 577333 T7 165

KE085- 052 Hut site Inchincoosh 506689 577334 T7 189

KE086- 012 Building Inchee 508833 576635 T8 405

KE085- 053001 Megalithic tomb - unclassified Lettercannon 507646 575845 T11 238

KE085- 053002 Hut site Lettercannon 507646 575845 T11 238

And a further three monuments which were recorded during archaeological assessment/monitoring as part of previous windfarm planning applications within the site:

CH 1 Hut / House Lettercannon 507552 575666

CH 2 Hut site Lettercannon 507568 575664

CH 3 Hut site Lettercannon 507555 575881

The EIAR notes that while none of the monuments will be directly impacted by the proposed development there is a potential for a number of the monuments/features to be damaged during the proposed works, particularly during the decommissioning of existing turbines. The EIAR states that this is particularly true in relation to:

KE086- 012 Building Inchee 508833 576635 T8 405

KE085- 053001 Megalithic tomb - unclassified Lettercannon 507646 575845 T11 238

KE085- 053002 Hut site Lettercannon 507646 575845 T11 238

CH 1 Hut / House Lettercannon 507552 575666

CH 2 Hut site Lettercannon 507568 575664

CH 3 Hut site Lettercannon 507555 575881

In the case of these six monuments/features the EIAR recommends that the monuments are fenced off during construction work to protect against accidental damage and this mitigation is appropriate

The EIAR notes that much of the existing infrastructure will be reused but there will still be a need to construct new roads, turbine bases, cabling ducts/trenches, hardstands, drainage works, compounds etc. The EIAR outlines the potential for the survival of sub-surface monuments/features and artefacts and proposes that all excavations/ground works in previously undisturbed areas of the site will be archaeologically monitored. This monitoring will be carried out under licence from the National Monuments Service and reports will be submitted to the planning authority and the NMS on completion. Again, this mitigation is appropriate.

The proposed mitigation measures outlined in the EIAR are appropriate and address the identified direct and potential impacts on the recorded and potential archaeology of the development site. In summary, the following Conditions should attach to any grant of permission:

1. The following archaeological monuments/features should be securely fenced off during construction and appropriate signage should advertise the presence of the monuments in order to avoid accidental damage. The fencing should be established and erected under archaeological supervision. No excavation, storage of materials or traffic of machinery should be permitted within these buffer zones
 - KE086- 012 Building Inchee 508833 576635 T8 405
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2. ALL soil/peat stripping, excavations and ground works in proximity to the identified archaeological monuments/features and in previously undisturbed areas of the proposed development site should be archaeologically monitored, under licence from the National Monuments Service. On completion of the monitoring reports outlining the results should be submitted to the planning authority and the NMS

Regards,

Dr Michael Connolly,
County Archaeologist

Kerry County Council

Memo

From: Eoin Kelleher E.Planner and Ecologist, Environmental Assessment Unit

To: Seán Flahive, E. Planner

RE: SID Project ABP Ref:319471-24- Biodiversity considerations

Date: 17.06.24

1. Project overview

This ([Kilgarvan Planning](#)) proposal seeks to decommission the existing 28 no. turbines, replace them with 11 no. wind turbines, and upgrade the associated infrastructure at the Existing Kilgarvan Wind Farm site in the townlands of Inchincoosh, Lettercannon, Inchee, Coomacullen, and Cloonkeen in County Kerry. As part of this, it is noted that upgrade works are proposed to the existing 110kV Coomagearlahy sub-station.

The proposal provides for a limited range of turbine dimensions comprising: a total tip height in the range of 199m minimum to 200m maximum; a hub height in the range of 118m minimum to 125m maximum, and a rotor diameter in the range of 149m minimum to 163m maximum. Each turbine will be capable of generating from approximately 6 MW to 7.2 MW, with an overall installed capacity of at least 50MW. A borrow pit, a met mast as well as 2.No construction compounds are also proposed. The borrow pit would be an extension of an existing one. It is outlined that the borrow pit would be excavated by breaking or blasting and would be backfilled with up to 3m of peat and spoil material.

This application seeks a ten-year permission and a 35-year operational life from the date of full commissioning of the Proposed Development

The application is accompanied with an EIAR and an NIS. A 'white-tailed eagle outline risk management plan' and other reports are included within the appendices to the EIAR.

KCDP 11-69 Ensure that developments in upland areas provide sufficient storm water attenuation to avoid the occurrence of river erosion or flooding downstream subject to hydrological and ground/peat stability assessments

Volume 6, subsection 1

Fine Sediment Control

S1.3.6 of Volume 6 of the Kerry CDP, includes the requirements in relation to fine sediment control:-

Section 1 Development Management Standards & Guidelines, subsection 1.15.1 Wind Energy is also of relevance.

3. Nature conservation designations in the vicinity

Nature conservation sites located in the vicinity are outlined in S6.4 of the EIAR. The European Sites list is replicated in S2.2 of the NIS. These are considered to be complete lists.

4. Observations

4.1 General observations

While it is noted that the planning history of the site is outlined in the planning report submitted, it does not appear to have been indicated if there are limits to the duration of consent for the operation of the existing turbines or if they enjoy the at least theoretical benefit of operating in perpetuity. This information would have been useful, to more fully establish the 'baseline' and the 'Do -Nothing Scenario'. The do-nothing scenario is set out in S6.5.2 of the EIAR, however this does not discuss impacts on Terrestrial Ecology as could result from this scenario – positive or negative.

Notwithstanding the above, this assessment will be undertaken on the 'worst case scenario' basis i.e that the existing turbines have a limited operational duration after which the site would have been restored.

4.2. Birdlife

Potential for impact on birdlife and in particular the white-tailed eagle is considered to be an important consideration for this proposal. The field survey constraints and limitations as set out in S6.4.7 of the EIAR are noted. It is considered that the information collected and submitted is sufficiently detailed and extensive to allow for impact assessment.

Potential operational disturbance / displacement of birdlife is assessed within S6.5.5.5.1 of the EIAR. As part of this, it is outlined that there is low likelihood of any significant change in the pattern of usage of the site post-construction. This is accepted however as outlined previously it does not provide details on the alternative 'do nothing' scenario associated with site restoration.

It is noted that in the interest of breeding birds, 'construction will not commence during the Breeding Bird season from April to July inclusive. Construction may

commence at any stage from August onwards to the end of March, so that construction activities are ongoing by the time the next breeding bird season comes around and can continue throughout the next breeding season'. This is considered to be acceptable.

It is also noted and considered appropriate that the proposal has been informed by observed avian flightlines as described and mapped in Appendix 6-2 of the EIAR. It is further noted and welcomed that a 'white-tailed eagle outline risk management plan' has been prepared for the proposal and is included as appendix 6.9 of the EIAR. It is noted that this has taken account of the mitigation to prevent eagle mortality as agreed for the existing Grousemount Wind Farm and which is required by the Kerry CDP 2022-2028. This approach is considered to be acceptable. The EIAR outlines that a suitably qualified ornithologist will be appointed to develop and oversee the implementation of the finalised white-tailed eagle risk management plan – which is considered to be appropriate.

4.3 Aquatic interests

While the proposal seeks to utilise existing internal roadways, it is nonetheless considered important that sufficient storm water attenuation is provided so as to avoid the occurrence of river erosion or flooding downstream, as is required by KCDP development objective 11-69. This attenuation should preferably be provided by way of nature-based-solutions e.g. leaky dams, ponds. This is of more relevance now than when the previous applications were permitted, due to recognition of increased likelihood of intense rainfall events associated with climate change.

Sensitive salmonid watercourses are located downstream. It is noted that a peat management plan has been submitted as part of the proposal, which is considered appropriate. As part of this, a safety buffer zone has been identified in the Peat Stability Risk Assessment (PSRA) Appendix 8-1. Similarly stockpile restriction areas are outlined in Appendix A.2 Figure A-2-1 to Figure A-2-3 of the PSRA).

Responsibility for implementation and monitoring of water quality related mitigation measures should be clearly identified and should be overseen by a suitably qualified person/team.

4.4 Lesser Horseshoe Bat (LHB)

The proposal is located outside of core sustenance zones identified for protection in the conservation objectives for LHB associated with European Sites in the vicinity. There is no potential for impact on LHB related conservation objectives.

4.5 Habitat loss / Blanket bog / site rehabilitation

Habitat value is generally greater towards the west of the wind farm site, where areas of wet heath, outcropping rock, blanket bog and dry heath habitats are present. It is noted that a Blanket Bog Rehabilitation and Management Plan is proposed to rehabilitate/restore an area of blanket bog (c.5.5ha), which has previously been partly drained and planted with conifers, in order to mitigate for the loss of blanket bog and heath habitats as a result of the Proposed Development. The proposed works include

the felling of coniferous forestry and drain blocking which will be completed during the construction phase of the Proposed Development.

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It is noted that S3.2 of the 'Blanket Bog Rehabilitation and Management Plan' outlines monitored requirements, including monitoring of habitat restoration and revegetation of decommissioned areas of the Existing Kilgarvan Wind Farm, including the borrow pit. As part of this status reports are to be submitted to NPWS and KCC.

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4.7 European sites

The Site Boundary does not lie within any EU Natura 2000. The closest Natura 2000 site is Killarney National Park, Macgillycuddy's Reeks & Caragh River Catchment SAC (000365) is located within 0.1km of the entrance from the public road at Cloonkeen. The nearest of the proposed turbines is 1.6km from this SAC. The main risks to the SAC from the proposal are water quality related. Old domestic building, Curraglass Wood SAC 002041 is located c. 2.8km over-land to EIAR Site Boundary. The proposal is located outside of core sustenance zones identified for protection in the conservation objectives for Lesser Horseshoe Bat (LHB) associated with this and other European Sites in the vicinity. There is no realistic potential for impact on LHB related conservation objectives. Mullaghanish to Musheramore Mts. SPA 004162 is c. 7.8km over-land to EIAR Site Boundary with the nearest turbine being c.10km to the SPA. This SPA is designated for breeding Hen Harrier. There is no realistic potential for impact on the conservation objectives of the SPA.

5. Overall conclusion

Having regard to the information submitted, significant adverse impacts on biodiversity interests based on existing conditions are not anticipated. However, if the existing windfarm or elements of it are time limited, the Bord should satisfy itself that the 'do nothing scenario' has also been adequately assessed, which may also require a review of environmental data, assessments and requirements of planning history files.

6. Recommended conditions to be included in any grant of planning permission

6.1 General

All environmental mitigation measures as set out in the information submitted in support of the application, including within the EIAR and the NIS shall be fully implemented, except as may be otherwise required or specified by way of condition.

Reason: In the interests of clarity and the proper planning and sustainable development of the area.

6.2 Environmental Protection

- (i) The developer shall appoint a full-time, appropriately qualified environmental manager for the duration of the construction and development phases of the project. This person will be responsible for ensuring that all environmental control measures are fully implemented and maintained, and will also act as the point of contact with the Planning Authority in the event of any environmental difficulties arising with the project. Contact details of the person in question shall be provided to the Planning Authority prior to any works commencing on-site.
- (ii) In advance of any works commencing on-site the developer shall prepare and submit a Construction Environmental Management Plan (CEMP) for approval by the Planning Authority. The CEMP shall cover all relevant environmental issues potentially associated with the development phase of the project, including air quality, noise control, water management, waste management etc.
- (iii) No silt/sediment laden water shall be discharged from the development to any watercourse in the vicinity of the site. In this regard, during the development phase of the project, a suitable system for the collection and treatment of any sediment/siltation arising shall be installed on-site and maintained thereafter for the duration of the development works.
- (iv) Bunds shall be installed around all temporary oil-containment facilities and the developer shall ensure that no oil, grease or other objectionable matter is discharged into any drain or watercourse.

Reason: In the interests of clarity, environmental protection and the proper planning and sustainable development of the area.

6.3 Biodiversity

A Blanket Bog Rehabilitation and Management Plan and a White-tailed Eagle Risk Management Plan shall be provided as outlined in the plans and particulars submitted as part of the planning application.

Reason: In the interests of biodiversity and the proper planning and sustainable development of the area.

6.4 Construction Management Plan

The construction of the development shall be managed in accordance with a Construction Management Plan, which shall be submitted to, and agreed in writing with, the Planning Authority prior to commencement of development. This plan shall include all environmental and ecological measures arising from reports submitted with the planning application and shall provide details of intended construction practice for the development, including:

- (a) The location of the site and materials compound(s) including area(s) identified for the storage of construction refuse.
- (b) The location of areas for construction site offices and staff facilities.
- (c) Details of boundary treatment, site security fencing and hoardings.
- (d) Details of on-site car parking facilities for site workers during the course of construction.

Reason: In the interest of clarity, environmental protection and the proper planning and sustainable development of the area.

6. Summary

A considerable amount of ecological surveys and assessments have been undertaken, in support of the proposal. It is evident that the proposal has had regard to the requirements of the Kerry CDP 2022-2028 and that the requirements of same along with the ecological findings have influenced the proposal, including the proposed provision of an outline White-tailed Eagle Risk Management Plan - which is considered to be appropriate. It is noted that the reports submitted conclude that the proposal is compatible with the requirements of the Habitats Directive. The Bord should satisfy itself that the 'do nothing scenario' has been adequately assessed. In the interests of clarity, biodiversity and the proper planning and sustainable development, a number of recommended conditions have been outlined.

MEMORANDUM

To: Mick Boyce. – SEE Environment Department.

From: Stuart Roche - Environment Department.

Re: ABP-319471-24 - Proposed Windfarm repowering Application of the existing Kilgarven Wind Farm

Date: 30th May 2024.

Mick

I had a look at the above proposed re-powering application on SID Website and the associated Environmental Impact Assessment report submitted. As outlined, the proposal is for the removal of 28 turbines with construction of 11 new turbines. Main issues to note from water quality aspect:

- Removal of existing 28 turbines
- Construction of 11 turbines
- Underground cabling
- Upgrading existing tracks & hardstand areas
- Extension & re-use of existing borrow pit
- Temporary construction compounds
- Construction of meteorological masts
- Forestry felling of approx. 8.9 hectares
- Drainage works on site.

I note that the Proposed Development site is located in 3 surface water catchments. To the southwest, the vast majority of the Proposed Development site, is located within the Dunmanus-Bantry Kenmare surface water catchment. A small area in the northwest and the majority of the main access road are located in the Laune-Maine-Dingle Bay catchment. A total of 36 surface water grab samples were undertaken to determine the baseline water quality of the primary surface waters originating from the Proposed Development site. The monitoring and sampling completed in July 2022 occurred during a dry period with minimal rainfall. Meanwhile the sampling completed in January 2023 was preceded by a mixture of dry and wet days.

Proposed Development site is located within the Flesk River sub-catchment (Flesk [Kerry]_SC_010) and 3 no. WFD river sub-basins. The northwest of the Proposed Development site is located in the Loo_010 river WFD sub-basin.

Should An Bord Pleanála see fit to grant this application, I would recommend that the following conditions should be applied to any permission which might issue in relation to this application :

- All environmental mitigation measures as set in the information submitted in support of the application to which this permission relates shall be fully implemented, except as may be otherwise required or specified by way of planning conditions.
- The Run off control and drainage management proposals submitted with this application shall be fully implemented.
- Runoff from access tracks, turbine bases, and developed areas (construction compounds, met masts) will be collected and treated in local (proposed) silt traps and settlement ponds/swales and then discharged over buffered outfalls. Runoff from the decommissioned areas will be treated in local swales before being discharged over buffered outfalls.
- Bunds shall be installed around all temporary oil-containment facilities and the developer shall ensure that no oil, grease or other objectionable matter is discharged into any drain or watercourse.
- The surface water sampling regime highlighted and proposed in the Environmental Impact Assessment submitted with the application shall be fully implemented. The sampling regime will be agreed with the relevant local authority in advance.
- The developer shall appoint a full-time, appropriately qualified environmental manager for the duration of the project. This person would be responsible for ensuring that all environmental control measures are fully implemented and maintained, and would also act as the point of contact in the event of any environmental difficulties arising with the project.
- No polluting matters including sediment laden waters shall be discharged directly or indirectly to any waters from the proposed works including the felling operations. Suitable measures shall be put in place onsite in advance of any demolition works to prevent sediment laden waters entering any waters. The ongoing management of these measures is critical.
- The developer shall ensure that proven forestry best practice methods are used to mitigate the risk of release of sediments/suspended solids to any water course/surface drain during the felling and ground works operations on site for the duration of the proposed development.

- In the event of complaints being received regarding alleged noise nuisance from the proposed rock breaking or borrow pit excavations and construction phase of this development to which this permission relates and, upon investigation by Kerry County Council, such complaints are found to be justifiable the applicant shall, upon written receipt of notification from the Planning Authority, retain the services of an acoustic specialist to establish the cause of the noise or nuisance and the remediation measures required in order to abate said nuisance. The applicant shall ensure that all such measures are fully implemented and shall be liable for all costs incurred therein.
- If deemed necessary by the Planning Authority, the applicant shall carry out ambient noise monitoring at locations adjacent to the site during the demolition and construction phase of the development. The scope of the monitoring shall be agreed in advance with the Planning Authority.
- Settlement ponds shall be designed to suit each specific drainage catchment and the proposed settlement ponds at the borrow pit will be designed to ensure suitable effective retention.
- The burning or burial of waste is prohibited at the site.
- Any and all hazardous waste/material generated at the site shall be taken directly to a suitably authorised waste facility or transfer to a suitably licensed waste collector.

If you need any further information on the above, please don't hesitate to contact me.

Best regards

Stuart Roche
 Environment Section
 Kerry County Council

Seán Flahive

From: Eoghan O'Brien
Sent: Thursday 13 June 2024 11:03
To: Seán Flahive
Cc: Mike McEnery
Subject: RE: ABP-319471-24 - Proposed Windfarm repowering Application of the existing Kilgarven Wind Farm

Sean

I reviewed the application in terms of the risk of flooding associated with the proposed windfarm redevelopment. The proposal as detailed in the application will not increase the risk of flooding downstream of the development if all mitigation and monitoring measures relating to the pre-commencement, construction, operational and decommissioning phases of the proposed development as set out in the application and summarised in the Schedule of mitigation and monitoring proposals are implemented.

The Construction Environmental Management Plan (CEMP) outlines measures for the management of all surface water and run-off on the site, for the protection of watercourses and in particular, sediment and erosion control. These measures will need to be implemented in full and a robust monitoring and audit system put in place to ensure compliance with the developed CEMP and to ensure regular inspection, maintenance and repair of the drainage channels, settlement ponds, swales, dams, silt fences and outfalls.

If planning is granted the detailed design of the surface water drainage and management system and the developed CEMP should be updated prior to the commencement of construction to include all mitigations and monitoring measures, planning conditions and alterations to the EIAR and must be submitted to the Planning Authority for written approval prior to the commencement of development.

Eoghan O'Brien

Senior Executive Engineer | Flooding & Coastal Protection Unit |
Kerry County Council | Princes Street | Tralee | Co. Kerry V92 YX54
Mob: 086-3891039 ☎ 066-7162126 | ✉ eoghan.obrien@kerrycoco.ie



Comhairle Contae Chiarraí
Kerry County Council



To: Sean Flahive, Executive Planner,
From: John Ahern S.E.E., Killarney M.D. Engineer
CC: Dawn Diggins
Date: 26th June 2024
Re: ABP-319471-24, Proposed Repowering of the Existing Kilgarvan Wind Farm, Co. Kerry

Regarding the above proposed development, I have no object to the proposal subject to the following conditions and recommendations of the Directorate of the Roads & Transportation which are to be applied,

Conditions and Recommendation

1. Works adjacent to the Public Road shall not affect the surface water drainage regime of the public road and no surface water within the development shall be allowed to flow onto the public road.
2. The formation of the existing splayed entrance shall not interfere with the roadside drainage, which shall be maintained, repaired or made good by providing a dished channel constructed of concrete or piped culvert.
3. The applicant must make good any damage cause to the public road because of their works to the satisfaction of the Kerry County Council Roads Engineer.
4. All works adjacent to or on the public road shall require a road opening licence approved by the Roads & Transportation Directorate. The approval of this licence will be subject to the developer / contractor possessing the adequate level of insurance which indemnifies Kerry County Council. The developer / contractor will furthermore have to produce a company safety statement along with a site-specific safety plan. The site-specific safety plan shall include a site-specific risk assessment and a traffic management plan.
5. The applicant shall institute appropriate measures to prevent material being drawn from the site onto the public road. No earth, soil or other material from this site shall be drawn or deposited onto the public road. Wheel washes shall be installed during the construction phase to prevent construction vehicles and plant from depositing debris and dirt on the public road.
6. All vehicles during construction phase of this proposed development must be parked within the site.
7. During the Construction and Delivery Phases, suitable Advance Warning Signage shall be provided as appropriate on the approaches to entrance to the Windfarm, to the satisfaction of the Road Authority and always maintained in satisfactory condition during the Construction and Delivery phases. The signage shall be clearly legible from the public roadway at the entrance to the site and shall be maintained to not be obscured or rendered illegible by dust, mud or vegetation. This signage should design and located in accordance with the Traffic Signs Manual.

8. The delivery times and haulage routes to be agreed in advance with the Road Authorities and An Garda Síochána.
9. A Bond of €50,000 shall be placed on this development, to be used if required, to repair any damage to the public road because of this development.

Yours faithfully,

**John Ahern, S.E.E.,
Municipal District Engineer,
Killarney**

Cathaoirleach Breandan Fitzgerald welcomed the application and said as outlined by the Senior Planner, the report circulated sets out the views of the Planning Authority on the application and will be submitted to An Bord Pleanála. The views of the Elected Members will also be included with the submission to An Bord Pleanála.

Cllr. Michael Foley noted the report and said that he had no doubt there will be further applications and asked what will happen to the existing 28 concrete bases.

Cllr. Johnny Healy-Rae said this location was one of the first places in Kerry where Wind Turbines were erected. It is a very remote area and during the County Development Plan process it is the location where the Elected Members requested the zoning of additional wind turbines, so there would be no further requirement to zone any additional lands / location. It is situated in the Glenflesk / Kilgarvan area with no residential properties anywhere nearby. If there was such a place to erect wind energy this would be an ideal location, he said. It is in a remote location with access to the N22 and will have no effect on anyone. He outlined that a number of additional wind farms were erected a number of years ago and there was no objection to same. He said it is unlikely to have any visual impact, as the area is so vastly remote. He said if green energy is the way of the future, it is an ideal location for wind turbines.

Mr. D. Ginty Senior Planner confirmed that it would be more problematic from an environmental perspective to remove the existing 28 turbines. The new turbines will be located very close to the existing turbines and there is a peat restoration plan submitted with the application.

It was agreed to accept the Chief Executive's Report on Strategic Infrastructure Application for Removal of 28 no. existing turbines and relevant ancillary infrastructure and erection of 11 no wind turbines with a blade tip height range from 199.5m to 200m, a hub height range from 118m to 125m and a rotor diameter range from 149m to 163m, along with associated foundations and hard standing areas in the townlands of Inchincoosh, Inchee, Lettercannon, Coomacullen and Cloonkeen, Co. Kerry