

File With _____

SECTION 131 FORM

Appeal NO: ABP 322154-25Defer Re O/H ☐Having considered the contents of the submission dated/ received 22-04
fromDR. I. STUIJTS I recommend that section 131 of the Planning and Development Act, 2000
be/not be invoked at this stage for the following reason(s): _____

E.O.: _____

Date: _____

For further consideration by SEO/SAO

Section 131 not to be invoked at this stage. ☐Section 131 to be invoked – allow 2/4 weeks for reply. ☐

S.E.O.: _____

Date: _____

S.A.O.: _____

Date: _____

M _____

Please prepare BP _____ - Section 131 notice enclosing a copy of the attached
submission

to: _____ Task No: _____

Allow 2/3/4 weeks – BP _____

EO: _____

Date: _____

AA: _____

Date: _____

File With _____

CORRESPONDENCE FORMAppeal No: ABP 322154-25

M _____

Please treat correspondence received on 22-04 as follows:

1. Update database with new agent for Applicant/Appellant _____	
2. Acknowledge with BP <u>BL50</u>	1. RETURN TO SENDER with BP _____
3. Keep copy of Board's Letter ☐	2. Keep Envelope: ☐
	3. Keep Copy of Board's letter ☐

Amendments/CommentsObs from Dr. Ingelise Stuijts.**4. Attach to file**

- (a) R/S ☐ (d) Screening ☐
 (b) GIS Processing ☐ (e) Inspectorate ☐
 (c) Processing ☒

RETURN TO EO ☐

	Plans Date Stamped ☐ Date Stamp Filled in ☐
EO: <u>Dorothy Carroll</u>	AA: <u>[Signature]</u>
Date: <u>25-04-25</u>	Date: <u>25/04/25</u>

AN BORD PLEANÁLA

LDG- 079473-25

ABP- _____

22 APR 2025

Fee: € 50 Type: cash

Time: 11:15 By: hand

Details

Submitter details

Name	DR INGELISE STUIJTS
Address	BANSE, KILMANAGH, COUNTY KILKENNY R95V9F6
Email	ingelise@woodarch.eu
Note	Attached Appendix 1

In relation to application

An Bord Pleanála Case Reference	PL10.322154
Kilkenny County Council Planning File Number	2560003
Applicant	Briskalagh Ltd.
Address	In the townlands of Acragar, Ballyconra, Ballycuddihy, Ballyroe, Ballyroe (Grace), Ballyroe (Maher), Baunaniska, Boherkyle, Briskalagh, Brittas, Clone, Coolnapisha, Curraghduff, Freshford, Freshford Lots, Graigueswood, Grange, Huntstown, Kilmanagh, Knockeenglass, Knockown, Moatpark, Monabrika, Monavadaroe, Moneenaun, Oldtown, Oldtownhill, Parksgrove, Picketstown, Rathealy, Sart, Sweethill, Tobernapeastia, Tullaroan, Upperwood Demesne, Co. Kilkenny.

Subject: An Bord Pleanála Case Reference: PL10.322154

Kilkenny County Council Planning Application Reference: 2560003

To: An Bord Pleanála

This submission is made in response to the First Party Grounds Of Appeal (GOA) lodged by Briskalagh Ltd. following Kilkenny County Council's (KCC's) decision to refuse permission for the proposed wind farm development at Briskalagh. This submission supports the refusal and reiterates serious and well-founded concerns regarding residential amenity, fourteen chapters of the Environmental Impact Assessment Report (EIAR) not meeting statutory EIA requirements and the planning authority's statement that there is a 'lack of supporting information for certain ecological receptors (such as birds) in both the Stage 1 Screening and Stage 2 Natura impact Statement' and that the planning authority was 'not satisfied that there is no risk of adverse effects on the integrity of the associated European Sites.'

The applicant's Grounds of Appeal (GOA) document fails to demonstrate that the proposed development is either responsible or compliant with established standards and regulations.

Equally concerning is the lack of a meaningful assessment of the project's cumulative impacts, as stated by Kilkenny County Council "insufficient detail has been provided on the matter of cumulative effects, especially in regard to the likely effect on the residential amenity of the immediately adjacent residential areas".

Well-found concerns regarding human health and well-being have also not been allayed by the contents of the applicants appeal document.

The Grounds of Appeal (GOA) fails to overcome the reasons for refusal issued by Kilkenny County Council and as a resident of the area I wish to highlight the following flaws within the GOA:

1. Planning Policy Contravention: Including, but not isolated to, the Kilkenny County Development Plan 2021–2027.

2. Human Health & Amenity: The applicant has failed to address judicial precedent (Justice Egan ruling) and failing to rebut community's health-based evidence.

Shadow flicker impacts exceed legal thresholds for 41 homes.

3. Water & Flooding: The proposed development is sited on and near a vulnerable aquifer and local drinking water source, CAAS and KCC confirm significant data gaps, invoking the precautionary principle. These gaps are not overcome within the GOA.

4. Biodiversity: The EIAR and NIS are non-compliant with EU law (Habitats Directive), there continues to be critical data gaps and errors along with new errors. Ornithological assessments flawed and the applicant denies bird sightings that appear in their own communications.

5. Cumulative Impacts: The GOA document does not resolve the inadequacies and deficiencies across 14 EIAR chapters and there continues a failure to properly assess combined effects of nearby wind farms (noise, visual, ecology, infrastructure).

6. Visual and Landscape Assessment: The applicant presented selective viewpoints in the application which obscured the true scale and visual impact. Rather than addressing this issue within the GOA, the applicant chose to focus on dismissing the community montages presented by KBT Responsible Energy in their submission to Kilkenny County Council.

7. Separation Distances: The turbine spacing violates the 2006 WEDGs. The appeal does not supply minimum turbine manufacturer distances and uses hypothetical turbine model for noise and flicker modelling.

8. Property Values: The applicant dismisses Irish research showing negative impacts (CERIS 2023) on property prices while relying on older, foreign studies irrelevant to this context. A high volume of homes within 2km are likely to experience severe amenity degradation.

9. Company Structure & Responsibility: The applicant misrepresented company structure in community engagement and the GOA does not satisfactorily address concerns relating to compliance, enforcement and liability.

10. Planning Application Deficiencies: Failure to address issues relating to incomplete maps (e.g. missing scale bars, housing omissions), national schools omitted from scoping stage and exclusion of refused projects.

11. Heritage: Potential impacts on St. Aidan's Church and Kilmanagh Creamery have not been appropriately addressed.

12. Community Engagement: The statements within the GOA of "active engagement" with the community and "understanding of the key issues" are contradicted the 199 personal submissions and 547 signatures attached to the KBT Responsible Energy- Community Submission to KCC, which appears to have been completely disregarded by the applicant. In addition, the applicant fails to mention the July 2023 letter signed by 800+ locals, nor do they address the multiples of emails to the developer voicing concerns.

13. Haul & Grid Routes: Concerns relating to the excessive distance and multiple grid routes have not been adequately addressed. Additionally, the haul route through Kilmanagh village and knock-on impacts locally in terms of safety and inconvenience have also not been sufficiently addressed.

14. Omission of the true impact on Kilmanagh village as the primary impacted settlement.

Conclusion:

This community is not against renewable wind energy as evidenced by the existing and permitted wind farms in our community. However, there continues to be serious concerns regarding this proposed development.

As stated by Kilkenny County Council under the schedule of effects, "Having regard to the size and scale of the proposed development, the Planning Authority considers that the proposed seven (7) number turbines with 185metre tip height will, due to the cumulative effects of visual intrusion, combined with noise, flicker and disturbance of access, on a significant number of nearby dwellings in and around the settlements of Tullaroan, Kilmanagh, and Ballycallan, give rise to excessive levels of adverse effects on residential amenity in the area. These effects are integral and incapable of being mitigated because they arise from the extent and scale of the proposed works and their proximity and position relative to dwellings."

The Briskalagh Wind Farm appeal fails across critical technical, legal, environmental, and procedural domains. The potential impact of this proposed development poses a serious threat to human health for those of us who would live within such close proximity.

I respectfully urge An Bord Pleanála to uphold Kilkenny County Council's refusal and safeguard the planning integrity, legal standards, and community wellbeing of the residents of Kilmanagh, Ballycallan and Tullaroan and I thank you for taking the time to read my submission.

In addition, I support the KBT Responsible Energy Submission to An Bord Pleanála on this appeal.

Please find enclosed fee of €50.

Yours sincerely,



Date: 21-04-2025

Name	Dr Ingelise Stuijts
Address	Banse Glebe, Kilmanagh, Co. Kilkenny R95V9F6
Telephone No.	086-4090050

In relation to application

An Bord Pleanála Case Reference	PL 10.322154
Kilkenny County Council Planning File Number	2560003
Name	Briskalagh Ltd.
Address	In the townlands of Acragar, Ballyconra, Ballycuddihy, Ballyroe, Ballyroe (Grace), Ballyroe (Maher), Baunaniska, Boherkyle, Briskalagh, Brittas, Clone, Coolnapisha, Curraghduff, Freshford, Freshford Lots, Graigueswood, Grange, Huntstown, Kilmanagh, Knockeenglass, Knockown, Moatpark, Monabrika, Monavadaroe, Moneenaun, Oldtown, Oldtownhill, Parksgrove, Picketstown, Rathealy, Sart, Sweethill, Tobernapeastia, Tullaroan, Upperwood Demesne, Co. Kilkenny
Note	Appendix 1

21 April 2025

To: An Bord Pleanála

Dear Sir or Madame,

In addition to the 3-page signed submission and fee, I wish to add a number of additional issues that are very important to me, in my particular situation.

- Visual impact

I am very concerned that the proposed Wind Farm will disrupt the natural landscape and obstruct scenic views of the valley area of the proposed development site, turning a rural landscape into an industrial zone. It is important to consider the cumulative effect of the existing and /permitted wind turbines already in the locality.

- Impact on water

I am extremely concerned that the proposed development has raised concerns regarding the potential for water contamination, alteration of groundwater flow, impact on private wells and all group and public water schemes fed from the aquifer. I refer to a report commissioned by **Kilmanagh Ballycallan Tullaroan (KBT) Responsible Energy Submission 1 Expert Review** on Flooding and Hydrogeology by **Hydro-G** and the Appeal Response from Hydro-G to the GOP from MKO/HES (**KBT Appeal Response Submission Appendix 2**).

My house (H079) is in an area where access to water is not easy. Finding a good well through boreholes has been challenging. A neighbouring farm (which has a great water demand) was also not successful in reaching a proper source for its needs in Banse Glebe in September 2020 and had to go down to the river to achieve a proper supply. My own well is thus quite deep to reach a good flow of water. I am very careful in management and usage of my water source.

If the water bearing levels are altered or contaminated in any way, I will have no water supply for my house nor my land. Any concerns regarding impact on wells are dismissed in the GOP by the developer and there is no mitigation in case this happens.

- Human health impact including noise and shadow flicker

I am particularly concerned regarding the potential for noise pollution, infrasound, shadow flicker and other exposure, **especially electro-magnetic fields**. Please refer to **KBT Responsible Energy Submission 2, Group Submission, Appendix 1 Human Health Impact Including Noise** to Kilkenny County Council, and **KBT Appeal Response Submission, Appendix 1** from **Grosvenor Consultancy Appeal Response** to An Bord Pleanála, as well as my own living experiences.

Health Impacts

I am one of those persons who unfortunately is sensitive to infrasound and electro-magnetic fields. I experienced this in September 2020 when a 4G mast - unknown to me - started operating in the area. When Internet from this mast later that week was introduced into my home I almost fainted and my ears were ringing, then I knew for sure it was from the mast. I subsequently cancelled my just installed connection. My complaints were laughed at by the Company when I told them.

When the mast started operating, I almost fell from the stairs from sudden dizziness and tinnitus followed by fast heartbeats and not being able to stand properly. Later that week I developed high blood pressure, followed by insomnia, spreading skin discolourings, tinnitus, depression, and other health issues for which I consulted my GP regularly and who forwarded me to specialists. Currently, (April 2025) there is still no medical explanation nor proper diagnosis for my skin discolourings. Over the years I learned how to shield myself and my environment and made adaptations to my way of living and my house, though it remains a delicate balance.

I am seriously afraid that the proposed development will negatively affect my personal health through the cumulative effects of these sizeable turbines and the other existing and planned turbines in the area, added to my current living experience with a completely different source of exposure from electro-magnetic fields.

The developer, in their GOP, completely dismisses electromagnetism as a reason for concern. Chapter 5.36 of the Planning documents *"To date, there is no credible peer reviewed scientific evidence that demonstrates a direct causal link between wind turbines and adverse health impacts in people living in proximity to them. There is no*

evidence for any adverse health effects from wind turbine shadow flicker or electromagnetic frequency."

Yet, in Chapter 5.85 it is stated that *"Wind turbines, like all large structures, have the potential to interfere with broadcast signals, by acting as a physical barrier or causing a degree of scattering to microwave links. The alternating current, electrical generating and transformer equipment associated with wind turbines, like all electrical equipment, also generates **its own electromagnetic fields**, and this can interfere with broadcast communications."*

I am a human receptor with senses.

Health Impacts and Noise

The turbines are planned in a valley and on sloping hills beyond two recent large agricultural sheds in front of my fields. I am afraid that the sound of these turbines will interact with the metal roofs and lead to even more noise and infrasound experiences.

I also wonder about interaction/wake effects between the 7 turbines - with **60m height difference** - in an undulating landscape and bowl-shaped valley, where sound already travels far.

The cumulative effects of the proposed Briskalagh Wind Farm, added to the already existing Foyle Wind Farm 2.5 km uphill, in my view will be severe at my residence. The Foyle Wind Farm is very audible in some situations, but the Foyle turbines are much lower (120m) than the proposed Briskalagh turbines (185m). Moreover, the latter are planned close to my house only c. 870m away, rather than 2.5km for the Foyle ones.

The EIAR suggests (Appendix 12.7 and 8) that both Foyle Wind Farm and the proposed Briskalagh Wind Farm would produce 35-40 dB(A) max, which I respectfully do not believe, having my living experiences with Foyle.

Appendix 12.2 Cumulative screening suggests output from Briskalagh of 35dB(A) and Foyle 25 dB(A) max. It suggests that noise levels from Briskalagh will stop short just outside my front gate. This is too convenient to accept. It suggests to me that MKO/the developer play with data, numbers and lines to reach just the maximal or minimal acceptable targets whatever and whenever it suits them best.

Shadow Flicker

With regards to shadow flicker, table 5-9 suggests that my house H079, **873m** from the nearest turbine T07, would experience max daily shadow flicker of 48 minutes, annually max 54 hours and 17 minutes. The table suggests that *after the developer's adjustments* this would give rise to annually 16 hours 10 minutes and 19 seconds of shadow flicker from turbines 6 and 7, and that daily and annual mitigations are required. That table does not make for happy reading at all.

Given that occasionally I do experience shadow flicker at sunset (and moonset) from the Foyle turbines about 2.5km away, and the proposed higher and closer located turbines affecting my daily experiences at sunrise, my world seems to close in on me.

The developer is suggesting, that the Foyle Wind Farm would be too far away to experience shadow flicker. The developer has restricted the flicker zone to 1.6 kms from wind turbines. The developer has his information from online information from the Danish Wind Industry Association which he accessed in **2010** (Chapter 5). This is **not true**. I am living here and I am experiencing occasional shadow flicker from Foyle. (And shadow flicker is experienced in my garden, too.)

Table 5-10 shadow flicker mitigation indicates that my house H079 would have **66** days in which mitigation for shadow flicker is needed, because it would exceed the developer's set threshold. This would be between days 141-206, from **May 21 through July 25th**, basically the time of the year with the most enjoyment of spring and early summer. Mitigation would bring it **just** below the threshold max of 30 hours per year. Just below is **not** good enough for me. This seriously affects my enjoyment of house and garden. It seems very much juggling with numbers to reach the developer's target, such as I note elsewhere in various chapters in the developer's planning proposal.

This house was particularly attractive to me because of its setting with views to the East of the rising sun, which throughout the year shifts ('rolls' over the Slieveardagh hilltop) from South to North, and back again to its Southern position in winter. In short, my daily living experience will be very much negatively affected by this development health-wise, and quality-wise.

- Cumulative effect

To my knowledge there are no similar sized 185-metre-high turbines currently operational on the Island of Ireland in such close proximity to two village settlements in a densely populated and diverse landscape, affecting about 40 homes severely. There are about 215 homes and business located within a range of 2 km of the proposed project which would be seriously affected by this project. Moreover, the height differential between the proposed new turbines and the existing turbines in the area is a massive 60m.

I am concerned that the cumulative effects of the multiple wind turbines already permitted in the locality could not have been appropriately assessed with regards to noise, visual impact, environmental effects, plus human health. I refer to **KBT Responsible Energy Submission 1 Expert Review** the various sections on noise and infrasound (Les Huson, Grosvenor).

I refer to my comments above that I am seriously afraid my personal health and quality of life will suffer from this development.

- Land use and cumulative effect

My land (about 5 acres) is rented out to a local person who keeps horses on it. One of them is occasionally sensitive to the Foyle wind turbines when they are particularly noisy. He gets quite anxious and agitated, and avoids my upper field. I am concerned that the proposed development which includes taller and more powerful turbines much closer by, will negatively impact their health and wellbeing through noise and shadow flicker, and that my land use for horses will become impossible. This will negatively affect my land use and finances.

I add that one of my cats is also afraid of the Foyle turbines when they are noisy and runs inside.

- Haul Routes

The proposed Wind Farm and haul routes involved will have significant negative impacts on the surrounding area during the construction phase causing traffic disruption, wear and tear to the roads, safety concerns and could also impact local infrastructure for a considerable period up to two years.

I envisage that my regular trips to Freshford and Threecastles may become impossible or dangerous at least because of the heavy traffic over narrow roads during especially the construction phase. Basically, our villages of Kilmanagh, Tullaroan and Ballycallan will become a no-go area with much extra traffic from site workers too. The traffic from these villages back-and-forth to Kilkenny will be seriously affected, including school transport, shopping, home care etc.

There is already much (farming) traffic on the roads during the year with slurry tanks, silage operations and harvests, fertilizers, milk and feeding trucks, transport of animals, cattle food etc. which can be dangerous to other road users at times. And there is the normal traffic including school busses, bikers following the North Kilkenny Scenic cycling Route, motorcycles, cars and pedestrian walkers. How this can be combined with the proposed development works I just cannot see.

With schools, churches, graveyards, patterns, shops, pubs and post-offices it is difficult to see how life will go on during the construction period (that includes Saturdays). Would traffic through Kilmanagh, Tullaroan and Ballycallan be halted whenever there is a funeral or wake going on? Or a hurling/camogie match? How about weddings against the backdrop of heavy loaded trucks and mud on the roads?

It is very likely that the traffic through Kilmanagh, which is the main thoroughfare for travel to both Kilkenny and Callan, also will be affected more than is described (rather than only for turbine components and concrete pouring delivery route).

- Grid Route

Works along the proposed Grid Route will cause significant disruption to residents and visitors from the wider area for an excessive time where works are planned moving from one location to the next for many kilometres.

I refer to my point Haul Route above. It will be impossible to cross the Hills to go North to Freshford/Ballyragget. Local people living in Freshford to Ballyragget will be seriously negatively affected. The road North of Freshford is very bendy and sometimes quite narrow especially near bridges.

- Flood risk

I am **very** concerned that the proposed development will exacerbate excessive flooding that Kilmanagh and surrounding areas are already experiencing. I refer to the specialist report commissioned by **KBT Responsible Energy Submission 1 Expert Review** by **Hydro-G** from February 2025 and the **GOP** submission from **KBT 21 April 2025** and attached **Appendix 2** by **Hydro-G**.

I add that the proposed project includes removal of vegetation including trees, forestry and hedgerows in the proposed Wind Farm area and near the planned Substation, and undoubtedly also along the transport and proposed grid routes. Those trees are important storages for moisture and rain, with roots holding soils/humus together. Trees capture rainwater, thus mitigating natural disasters such as flooding events and (land)slides. If these trees are felled, roads and verges will be more exposed to (soil) erosion, flooding and aqua planing. Especially during the construction period, which could last up to two years, this will be an added big risk to the already challenging conditions caused by increased (heavy) traffic and undoubtedly dirty roads.

I refer to the **GOP Response** from **KBT Responsible Energy Chapter 3 Water and Flooding** and **Appendix 2 Hydro-G Appeal Response** about serious concerns arising from works planned in the Briskalagh Wind Farm site and Substation area for a variety of reasons, that could have serious impacts on flooding risks South of the development area in the village of Kilmanagh.

There is a gap in information on the exact geological underground especially near the turbine locations, and borehole information onto at least the layers underneath the base of the turbines is essential. Especially the area around T7, for which there is no information at all, this causes real concern.

The remains nearby T7 of a historical weir in the Kilmanagh / Tullaroan River, that in some way must be connected to a mill race near the Kilmanagh bridge, suggests a special environment in this area. These could have (had) significant geological impacts, potentially altering groundwater levels and sediment transport which - considering a bridge is proposed here - should be properly assessed.

I repeat that as a result of tree removal and road building, the Briskalagh Wind Farm area and floodplain along the Kilmanagh/ Tullaroan River will be much more exposed to erosion and flooding. The receptors of this live South of the proposed development, and traffic through Kilmanagh will be seriously affected as the local bridge in Kilmanagh will be regularly impassable. Not to talk about erosion of amenities such as GAA fields and threat to houses, and possible contamination of group water scheme well and private wells.

- Biodiversity

I note that the MKO report recorded:

"...rich ground flora by hedgerow habitat in the west of the Proposed Wind Farm. Species recorded include wood anemone (*Anemone nemorosa*), bluebells (*Hyacinthoides non-scripta*), ground ivy (*Glechoma hederacea*), barren strawberry (*Potentilla sterilis*), primrose (*Primula vulgaris*) and early-purple orchid (*Orchis mascula*)."

Surely that habitat including early-purple orchid and wood anemone deserves preservation. I could not find any description where exactly the area was located. Likewise, apart from some hedgerows there are no exact locations given for plants, and moreover some information of the EIAR is inaccessible to readers.

I highlight the welcome presence of **black poplar** (*Populus nigra*) near the Kilmanagh/Tullaroan stream (Biodiversity Chapter). Along with the presence of otter and kingfisher this is surely a habitat that must be preserved. The black poplar is a very rare occurrence in Ireland and should have been more highlighted. This observation needs confirmation and further investigation.

MKO however states in their GOP that the black poplar was located outside the Wind Farm area, without giving further details. This is not good enough, and very selective information to the community. Moreover, this tree still warrants attention.

For the botany, I further refer to **KBT Responsible Energy Submission 2 Group Submission, Chapter 5a** from February 2025. In response to the GOP, I refer to **KBT Responsible Energy GOP Submission Chapter 4** and the **two specialist reports Appendix 3** from Mr. **Roger Goodwillie**, BSBA County recorder for Kilkenny, attached here for the Bord's convenience.

From my background as a palaeo-environmentalist/archaeobotanist I am very concerned about the planned removal of on the one hand topsoil, and the other hand hedgerows and woodland in the proposed wind farm area, as well as individual trees and shrubs along the proposed grid route including the substation.

Especially near the proposed substation, and along the proposed grid route through Tullaroan including Brittas Bridge there are mature trees **including oaks** (*Quercus robur*) of more than 50-100 years old (lining the "Monk's walk"), that have created their own micro-environment with humus and soil and capturing CO₂. I also note the presence of **mature oak** in the planned wind farm area, according to the MKO report. It is almost an affront to suggest that replanting of mainly whips in hedges and saplings (which do not include *Quercus robur*) along the Kilmanagh/ Tullaroan River combined with planting of wind turbines would save Ireland and the planet so much CO₂ and enhance biodiversity. Oaks are known to be an extremely rich source of biodiversity, CO₂ capture and water storage, building their micro-environment over hundreds of years.

I note the animal species listed on the proposed development site and I am concerned that the proposed development will cause significant adverse effects to those species listed, including red listed bird species, protected bats, fish and protected mammals.

Mammals mentioned by MKO occurring on the proposed Wind Farm site include Otter (*Lutra lutra*), Badger (*Meles meles*), pine marten (*Martes martes*, scat was recorded), red squirrel (*Sciurus vulgaris*), and the Irish hare (*Lepus timidus hibernicus*) who are all known to inhabit the area and who will be endangered by this project.

I refer to KBT Responsible Energy GOP Submission Chapter 4 for summary on the EIAR section regarding birds. There is a significant presence of red-listed and amber-listed bird species on the site. It is evident that this development would gravely reduce the area's biodiversity value and adversely affect several threatened bird species.

The Slieveardagh Hills landscape is an important route for migratory birds such as the golden plovers. The cumulative effect of multiple existing and permitted wind farms in this area, makes those birds vulnerable, especially when negotiating winds and flying at night times. Another wind farm in this area forces birds to spend much of their vital energy to "read the maps" to avoid collision and fight the winds, if they can at all.

I would like to add insects such as butterflies and (honey)bees to this list. Some butterflies travel long distances to get here carried by the winds.

The precious microbalance between trees/hedges and soil/humus layer that developed over more than, to take a conservative approach, 100 years to hundreds of years is much longer than the lifetime of a turbine. Not to talk about all small life-forms living in the soil such as Enchytraeids etc. and smaller soil organisms including algae, fungi and bacteria. These are all crucial for litter decomposition and **CO2 storage**, nutrient recycling, and soil/humus formation which will all be lost with tree felling, leaving **dead topsoil** behind.

This will also occur over a large area where the Wind Farm is planned. The proposed Wind Farm most certainly (as indicated in the EIAR) will require many acres of topsoil clearance to allow for road/turbine hardstands/borrow pit/buildings and parking places for 100 daily workers etc. I foresee a denuded moonscape...

Another observation is that the proposed project does not clearly show who would be responsible for the maintenance and care of new/amended hedgerows and riparian vegetation, and care of floodplain. Who owns what, who is responsible and how would this all be implemented, and controlled. This would be a closed area with a gated secured entrance, with the all-important Kilmanagh/ Tullaroan River and aquifer at its heart. See also attached letter from Roger Goodwillie re. the likely destructive influence on bat refuge, timescale of establishment ecological values of new planted vegetation etc.

I further refer to the report by **KBT Responsible Energy 2, Group Submission Chapter 5 Biodiversity**, and **Chapter 4** in their **GOP response**.

Mobile phone reception

I am concerned that my mobile phone and possibly internet/tv reception will be affected by this proposed development. I have read about experiences from people living close to turbines/wind farms. They repeatedly refer to problems with reception as well as interference with internet/tv reception.

I do note the remarks from the developer regarding tv reception, however, I am still concerned because of the living experiences of affected residents in Ireland living near other wind farms which tells a different story. The mitigation would be intrusive. There is no mitigation in the Briskalagh proposal how to solve any phone reception issue.

- Impact on property prices

I am concerned that the impact on the market value of property/sites in the locality will be seriously negatively affected. Please refer to the relevant chapter in **KBT Responsible Energy Submission 3, Group Submission, Chapter 3 House price index report**.

I feel trapped in my own house as I foresee that it might even be impossible to sell and flee, and my house value will be very negatively affected. And where to go? This has made me feeling depressed and sad, after living here more than 25 years. I saw myself living here for the rest of my life and I have invested in my living space and garden.

- Archaeology and Heritage

I am concerned that the archaeology and heritage of the area to be developed is not given much consideration. The proposed mitigation is monitoring during development and when something is found, take action. The proposed area is large and rural, and constitutes an area where people formerly are known to have lived with remnants/ruins of houses still present. The location on both sides of a river in an area where ringforts do occur points to at least presence during Early Christian times. It is very well possible that earlier remains could be found.

I also note that a weir, where a crossing is proposed to facilitate turbine 7, is not mentioned in the Heritage section. Stones from the weir works are still present in the location though it is unclear how much remains. The mill race near the bridge in Kilmanagh village probably was connected in a way to the weir. Surely, if works are planned in that location, that should be preceded with detailed geophysical surveys and test excavation.

For these reasons, I do not think monitoring is a good approach. This whole area to be developed should be investigated prior to any development by non-intrusive geophysical and other surveys, and trial excavations in sensitive locations. This was also requested by NMS.

I find it highly unlikely that development would be halted by the company to allow for excavations, as it takes time to get excavation licenses, licensed archaeologists and material to do a proper excavation.

- The planning of a (temporary) construction compound 01 including parking and spoil management areas about 700m from road R695 through Kilmanagh village and houses is **intrusive** to the living quality of Kilmanagh village. The proposed location lies at the southern end of the planned development, further South than proposed T7. This will be a constant noise of transport, spoil management, building etc. This is moreover not an environmentally friendly location as traffic need to come from the Northern entrance to the South – and back again- for multiple times, requiring petrol/diesel and unnecessary travel. Why this was not planned further North near where most turbines are planned?

Ingelise Stuyt

21-04-2025

KBT Responsible Energy GOP Submission Appendix 3a



Roger Goodwillie

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Kilmanagh Ballycallan Tullaroan (KBT) Responsible Energy
Kilmanagh

Co Kilkenny

Attn: Ingelise

16th January 2025

**Re: Review of Briskalagh windfarm reports: Biodiversity, AA/NIS and appropriate
Appendices PL. 2560003**

I have read the ecological surveys and appendices and find the botanical aspects particularly bad.

The knowledge of species shown is poor and the overall lack of awareness of botanical information is concerning. For example

The first part of the report deals with the general situation of the country. It is a very interesting and informative study of the country's development. The author has done a great deal of research and has gathered a wealth of material. The report is well written and is a valuable contribution to the study of the country's development.

The second part of the report deals with the economic situation of the country. It is a very interesting and informative study of the country's economic development. The author has done a great deal of research and has gathered a wealth of material. The report is well written and is a valuable contribution to the study of the country's economic development.

The third part of the report deals with the social situation of the country. It is a very interesting and informative study of the country's social development. The author has done a great deal of research and has gathered a wealth of material. The report is well written and is a valuable contribution to the study of the country's social development.

- Creeping jenny *Lysimachia nummularium* is most unlikely to occur in ryegrass fields particularly in the proportion of 20% coverage as quoted. It is associated with river floodplains, wet woodland etc, places that experience annual flooding. If it was really present, it requires a comment as to the reason it was there.
- The mention of *Alopecurus aequalis* at the end of the list of species shows a similar lack of botanical knowledge. This species is very rare in the country and is in fact listed in the Flora Protection Order 2022. It grows in pools that dry out during summer and its nearest wild occurrence is in a reservoir in Waterford. Slipping it into a list of improved grassland species shows a lamentable lack of awareness and calls into question the whole basis of the botanical/habitat section. (cf. the conclusion in 6.6.3)
- In the same way a record of *Polystichum aculeatum* in the woodland section has been included without comment although the species has only been recorded in two sites in the County this century.

Three mistakes in a section, probably made by an over-reliance on Google for identification, make one wonder if the information that is given there or elsewhere can be trusted. A glance at Stroh, P.A. et al (2023) *Plant Atlas 2020*. BSBI/Princeton, or access to the NBDC maps, would have alerted the writer or, later, the reviewer to these botanical errors.

In consultation there was also no contact made with the County Recorder of the BSBI (Botanical Society of Britain & Ireland) who collates such plant records.

Other points

It is not clear that the mitigation measures of habitat augmentation, extra hedges and trees will work in the long term. Who is going to own the hedges and can they not be clipped down to nothingness once 5 years pass? Perhaps a farmer agreement of some sort is mentioned somewhere?



Roger Goodwillie

(I am a full Member of the Chartered Institute of Ecology and Environmental Management (CIEEM), having qualified in Botany as B.A. (Mod.), M.Sc. I have been a practising ecologist for 50 years and am BSBI County Recorder for Kilkenny).

KBT Responsible Energy GOP Submission Appendix 3b



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Kilmanagh Ballycallan Tullaroan (KBT) Responsible Energy
Kilmanagh
Co Kilkenny

Attn: Ingelise

17th April 2025

Re: Comments on EIAR (Kilkenny PL. 2560003) and First Party Appeal to ABP by Briskalagh/MKO

In relation to botanical detail in the EIAR I would maintain that the inclusion of orange foxtail *Alopecurus aequalis* rather than marsh foxtail *Alopecurus geniculatus* is not a typographical error as suggested by the First Party appeal document but a factual error, a mistaken identification that was repeated with two other species, as mentioned previously to Kilkenny County Council – creeping jenny *Lysimachia nummularia* and hard shield-fern *Polystichum aculeatum*. No attempt has been made by MKO to discover if these species really occur on site and no reference to existing information introduced to justify them.

The lack of response from MKO only reduces confidence in the botanical/habitat identification if these noteworthy species remain without qualification.

Some hedgerow clearance is necessary for grid connections and haul routes and it is not clear if any of these hedge sections are of value. In such an intensively farmed area the hedges are often the only remaining refuges of plant species and invertebrates other than those associated with ryegrass. There is no data to show if they have any associated species of interest. To replace them with new planting is not a full mitigation as it will take many years for a hedge to accumulate biodiversity and a natural ecology if valuable sections are taken out and the seed sources removed. Hedge removal also has knock-on effects on bat behaviour and commuting routes. A newly-planted hedge will not become available to bats for several years so there may be temporary impacts on these organisms.



Roger Goodwillie

(I am a full Member of the Chartered Institute of Ecology and Environmental Management (CIEEM), having qualified in Botany as B.A. (Mod.), M.Sc. I have been a practising ecologist for 50 years and am BSBI County Recorder for Kilkenny).

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