

Cathy Carleton

From: Mike Amiel Mekell <mamekell@mkoireland.ie>
Sent: Tuesday 28 October 2025 16:23
To: Appeals2
Cc: Alan Clancy; Eoin McCarthy; Micheal Cahill
Subject: 230502-h Briskalagh Renewable Energy Development - Response to Further Information - ACP Ref. 322154-25 (Email 1 of 5)
Attachments: Cover Letter - ACP Ref. 322154-25.pdf; Response to Further Information (RFI) - ACP Ref. 322154-25.pdf

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An Coimisiún Pleanála,

On behalf of our client Briskalagh Ltd. (the Applicant), MKO wish to submit a Response to the Further Information Request (ACP Ref. 322154-25) issued by An Coimisiún Pleanála on the 6th of October 2025, under Section 132 of the Planning and Development Act 2000 (as amended).

Please see attached a Cover Letter, Response to Further Information report and its associated appendices. Due to the large file size of the documents, multiple emails will be issued. **This is email 1 of 5.**

I would be grateful if you could please confirm receipt of this email and the attached submission.

If you require any further details, please don't hesitate to get in touch.

Thanks so much for your time and consideration.

Is mise le meas,
Mike.

Mike Amiel Mekell BA, MSc, RTPI Licentiate
Planner

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An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
Ireland,
D01 V902.

Our ref: 230502-h

ACP ref: 322154-25

Date: 28th October 2025

Re: Response to Further Information Request in relation to An Coimisiún Pleanála Ref. 322154-25, for the Proposed Briskalagh Renewable Energy Development, Co. Kilkenny.

Dear Sir/Madam,

On behalf of our client Briskalagh Ltd. (the Applicant), MKO have prepared a detailed Response to Further Information (RFI) report in response to a Further Information Request (FIR) issued by An Coimisiún Pleanála ('the Commission') (ACP Ref. 322154-25) initially issued on the 15th of July 2025, and reissued on the 6th October 2025. The FIR was issued in relation to a First-Party Appeal made by the Applicant concerning a proposed renewable energy development which will comprise 7 no. wind turbines and associated infrastructure in the townland of Briskalagh and adjacent townlands near Kilmanagh, Co. Kilkenny which will be known as the Briskalagh Renewable Energy Development. A response to the FIR is due by the 28th of October 2025.

The Applicant is seeking a 10-year planning permission and a 35-year operational life. The planning application was submitted to Kilkenny County Council (KCC) on the 3rd of January 2025 (KCC Pl. Ref. 2560003), under the provisions of Section 34 of the Planning and Development Act 2000, as amended ('the Act'). On the 27th of February 2025 KCC decided to refuse the planning application. A first-party appeal was lodged with the Commission (ACP Ref. 322154-25) on the 26th of March 2025 against KCC's decision to refuse permission.

The proposed development description as set out in the public notices is as follows:

The development will consist of the provision of the following:

- i. 7 no. wind turbines with an overall turbine tip height of 185 metres; a rotor blade diameter of 163 metres; and hub height of 103.5 metres, and associated foundations and hard-standing areas;
- ii. A permanent 38kV substation compound (control building with welfare facilities, all associated electrical plant and apparatus, security fencing, underground cabling, storage containers, wastewater holding tank, site drainage and all ancillary works);
- iii. Permanent underground electrical (38kV) and communications cabling to the existing Ballyragget 110kV substation in the townland of Moatpark (including joint bays, communication and earth sheath link chambers and all ancillary works along the route). This cabling route is primarily located within the public road corridor which includes a Protected Structure (Kilkenny RPS Ref. C886);
- iv. Underground electrical (33kV) and communications cabling connecting the wind turbines and meteorological mast to the on-site substation;
- v. 3 no. temporary construction compounds (including site offices and welfare facilities);
- vi. A meteorological mast with a height of 30 metres, security fencing and associated foundation and hard-standing area;
- vii. A new temporary site entrance on the L1009;

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MKO Water Limited t/a MKO, Registered in Ireland No. 233589 VAT No. IE83585800
MKO Estates & Project Management Ltd, Registered in Ireland No. 013029 VAT No. IE97580211

- viii. *A new gated site entrance on the L5024;*
- ix. *Upgrade of existing site tracks/roads and provision of new site access roads, junctions and hardstand areas;*
- x. *A borrow pit;*
- xi. *Spoil Management;*
- xii. *Tree felling and hedgerow removal;*
- xiii. *Biodiversity Management and Enhancement Plan measures (including establishment of a riparian buffer and hedgerow enhancement);*
- xiv. *Site Drainage;*
- xv. *Operational Stage site signage; and*
- xvi. *All ancillary works and apparatus.*

A thirty five-year operational life from the date of full commissioning of the wind turbines and subsequent decommissioning of the wind turbines is being sought.

An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) have been prepared in respect of the proposed development and accompany this application.

Please find enclosed a detailed response to the items of the FIR issued by the Commission. The response has been prepared by MKO in collaboration with the wider project team including Alan Lipscombe Traffic and Transport Consultants Limited, AWN Consulting, Fluvio R&D Limited and Hydro-Environmental Services.

As part of the FIR, the Commission has requested a revised Natura Impact Statement. The revised Natura Impact Statement is included as Appendix 3 of the Response to Further Information.

The following documents are included in the RFI submission:

- This Cover Letter, dated 28th October 2025
- Response to Further Information Report, including the following appendices:
 - Appendix 1 – An Coimisiún Pleanála Further Information Request
 - Appendix 2 – Additional and Amended Plans and Detailed Drawings
 - Appendix 3 – Revised Natura Impact Statement
 - Appendix 4 – Revised Bat Survey Report
 - Appendix 5 – Baseline Environmental Noise Survey at Ballyragget
 - Appendix 6 – Predicted Omni-Directional Noise Levels
 - Appendix 7 – Predicted Cumulative Omni-Directional Noise Levels
 - Appendix 8 – Response by Hydro-Environmental Service
 - Appendix 9 – Detailed Site-Specific Hydraulic Modelling

I trust that the enclosed information is sufficient for the requirements of the Commission. If, however, there is anything further that you require, or if you have any queries, please do not hesitate to contact me.

Yours sincerely,

Mike McKell

Mike Amiel Mekell

Planner

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Response to Further Information

Briskalagh Renewable
Energy Development, Co.
Kilkenny

First Party Appeal: ACP-322154-25





DOCUMENT DETAILS

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Project Title: **Briskalagh Renewable Energy Development,
Co. Kilkenny**

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Document Title: **Response to Further Information**

Document File Name: **230502-h Briskalagh - FI Response Doc -
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Planning and
Environmental
Consultants

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F	Final	24/10/2025	MC, MM	AC, EMC

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- Appendix 2 – Additional and Amended Plans and Detailed Drawings
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- Appendix 4 – Revised Bat Survey Report
- Appendix 5 – Baseline Environmental Noise Survey at Ballyragget
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- Appendix 9 – Detailed Site-Specific Hydraulic Modelling

1

INTRODUCTION

1.1.1

MKO have been instructed by our client, Briskalagh Ltd., (the Applicant) to prepare this Response to Further Information (RFI) report in response to a Further Information Request (FIR) issued by An Coimisiún Pleanála ('the Commission') (ACP Ref. 322154-25) initially issued on the 15th of July 2025, and reissued on the 6th October 2025. The FIR was issued in relation to a First-Party Appeal made by the Applicant concerning a proposed renewable energy development which will comprise 7 no. wind turbines and associated infrastructure in the townland of Briskalagh and adjacent townlands near Kilmanagh, Co. Kilkenny which will be known as the Briskalagh Renewable Energy Development.

The Applicant is seeking a 10-year planning permission and a 35-year operational life. The planning application was submitted to Kilkenny County Council (KCC) the 3rd of January 2025 (KCC Pl. Ref. 2560003), under the provisions of Section 34 of the Planning and Development Act 2000, as amended ('the Act'). On the 27th of February 2025 KCC decided to refuse the planning application. A first-party appeal was lodged with the Commission (ACP Ref. 322154-25) on the 26th of March 2025 against KCC's decision to refuse permission.

On the 6th of October 2025, the Commission issued an FIR in accordance with Section 132 of the Act, which sought information on several items, a response to any issues raised in the third-party observations to the appeal is also sought. Section 2 of this RFI presents a full response to the individual Further Information (FI) items raised by the Commission. Section 2.7.4 of this RFI presents a response to the matters raised in the third-party observations to the appeal.

The proposed development description as set out in the public notices is as follows:

"The development will consist of the provision of the following:

- i. 7 no. wind turbines with an overall turbine tip height of 185 metres; a rotor blade diameter of 163 metres; and hub height of 103.5 metres, and associated foundations and hard-standing areas;
- ii. A permanent 38kV substation compound (control building with welfare facilities, all associated electrical plant and apparatus, security fencing, underground cabling, storage containers, wastewater holding tank, site drainage and all ancillary works);
- iii. Permanent underground electrical (38kV) and communications cabling to the existing Ballyragget 110kV substation in the townland of Moatpark (including joint bays, communication and earth sheath link chambers and all ancillary works along the route). This cabling route is primarily located within the public road corridor which includes a Protected Structure (Kilkenny RPS Ref. C886);
- iv. Underground electrical (33kV) and communications cabling connecting the wind turbines and meteorological mast to the on-site substation;
- v. 3 no. temporary construction compounds (including site offices and welfare facilities);
- vi. A meteorological mast with a height of 30 metres, security fencing and associated foundation and hard-standing area;
- vii. A new temporary site entrance on the L1009;
- viii. A new gated site entrance on the L5024;
- ix. Upgrade of existing site tracks/ roads and provision of new site access roads, junctions and hardstand areas;
- x. A borrow pit;
- xi. Spoil Management;
- xii. Tree felling and hedgerow removal;
- xiii. Biodiversity Management and Enhancement Plan measures (including establishment of a riparian buffer and hedgerow enhancement);
- xiv. Site Drainage;

- xv. *Operational Stage site signage; and*
- xvi. *All ancillary works and apparatus.*

A thirty five-year operational life from the date of full commissioning of the wind turbines and subsequent decommissioning of the wind turbines is being sought.

An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) have been prepared in respect of the proposed development and accompany this application."

Terminology

The terminology of project elements used within this RFI, remains consistent with the terminology used throughout the original planning application documents including the EIAR and is outlined below.

- Where the 'Proposed Project' is referred to this encompasses the entirety of the project for the purposes of this EIA in accordance with the EIA Directive. The Proposed Project is described in detail in Chapter 4 of the EIAR.
- Where the 'Proposed Wind Farm' is referred to, this refers to turbines and associated foundations and hard-standing areas, meteorological mast, access roads, temporary construction compounds, underground cabling, borrow pit, spoil management, site drainage, biodiversity enhancement and all ancillary works and apparatus. The Proposed Wind Farm is described in detail in Chapter 4 of the EIAR.
- Where the 'Proposed Grid Connection' is referred to, this refers to the 38kV onsite substation, associated temporary construction compound and 38kV underground cabling connecting to the existing Ballyragget 110kV substation, and all ancillary works and apparatus. The Proposed Grid Connection is described in detail in Chapter 4 of the EIAR.
- Where the 'Site' is referred to, this relates to the primary study area for the EIAR, as delineated by the EIAR Site Boundary in green as shown on Figure 1-1 of the EIAR and encompasses an area of approximately 1,000 hectares.
- Where the 'Proposed Wind Farm site' is referred to, this refers to the portion of the Site surrounding the Proposed Wind Farm but excluding the portion of the Site surrounding the Proposed Grid Connection underground cabling route.

Policy Overview

This section of the RFI provides an update to the policy overview relating to the Proposed Project since lodgement of the First-Party Appeal and should be read in conjunction with that document, as well as Chapter 2 Background and Policy of the EIAR and the Planning Report submitted with the planning application.

Programme for Government – Securing Ireland's Future

The Programme for Government 2025 – Securing Ireland's Future (January 2025) places specific emphasis on climate change, recognising that time is critical in addressing the climate crisis. The Programme states that the Government is committed to taking "decisive action to radically reduce our reliance on fossil fuels and to achieve a 51% reduction in emissions from 2018 to 2030, and to achieving net-zero emissions no later than 2050".

With regard to renewable energy generation, the Programme notes that the Government is committed to the rapid decarbonisation of the energy sector. The Programme states the Government's ongoing support and commitment to "achieving 80% of Ireland's electricity generation from renewable sources by 2030" and to delivering 9GW of onshore wind by 2030, as set out in the national Climate Action Plan.

The Proposed Project aligns with the Programme for Government as it will contribute to the achievement of 80% renewable energy and the delivery of 9GW of onshore wind by 2030.

Subsequently, the Proposed Project will support the Government's commitment to reducing reliance on fossil fuels and achieving net-zero by 2050.

Energy in Ireland 2024 Report

In December 2024 the SEAI published their '*Energy in Ireland 2024 Report*', stating that in 2023, 44.3% of the electricity generated indigenously in Ireland came from gas, with renewables accounting for a further 40.7%. The overall renewable energy share for gross final energy consumption for 2023 was 14.1%. 2023 had the lowest energy-related emissions of any year in the last quarter century, except for 2020 which was heavily influenced by the COVID-19 lockdowns. The SEAI Energy in Ireland 2024 report, states that energy-related emissions were down 8.3% from 2022 levels in 2023 and the carbon intensity of the national grid was down to 254 gCO₂/kWh, which is the lowest carbon intensity value ever reached in Ireland.

The Proposed Project will support the reduction of greenhouse gas (GHG) emissions in Ireland through the generation of clean renewable wind energy.

Revised National Planning Framework

In April 2025, both houses of the Oireachtas approved the Government's Revised National Planning Framework (Revised NPF). The revision reflects changes to Government policy that have taken place since the initial publication of the NPF six years ago, such as climate transition.

There is an increased emphasis on the importance of the renewable energy development and infrastructure needed to support this. Chapter 9 acknowledges that the "*accelerated delivery of the additional renewable energy generation is... essential for Ireland to meet its climate targets.*" A number of new or amended National Policy Objectives (NPOs) have been proposed in order to achieve this objective.

The Revised NPF sets out regional renewable energy capacity Southern Region, in which the Proposed Project is located, has been allocated an additional 978MW to meet these targets. Under NPO 74, all Regional Assemblies will be required to plan how and where to deliver the required capacity by identifying capacity allocations for each Local Authority in its area. Kilkenny County Council will then be required to plan for the delivery of the energy capacity target that they have been allocated, under NPO 75.

The introduction of renewable energy targets represents a more active and prescriptive approach to land use planning for renewable energy development. The Revised NPF aligns itself with the national target of 9GW of onshore wind energy with the policies and objectives of Local Authorities.

The Proposed Project is in line with the objectives of the Revised NPF which seeks to transition to a low carbon and climate resilient economy. If permitted, the Proposed Project will contribute to renewable energy generation, therefore supporting the relevant NPOs.

National Development Plan Review 2025

The National Development Plan Review 2025 (NDP) sets out a comprehensive capital investment framework for the period 2026–2035, totalling €275.4 billion. Within this framework, wind energy is recognised as a key enabler of the State's legally binding commitment to reduce GHG gas emissions by 51% by 2030, including a 75% reduction in emissions from the electricity sector, compared to 2018 levels.

The NDP highlights the “the continued focus and commitment of this Government to climate action and to ensuring Ireland is well positioned to realise the benefits of the transition to a green and sustainable economy”. The NDP emphasises Ireland’s climate and renewable energy commitments, “in addition to the national climate objective and 2030 target, Ireland has similar obligations under the Paris Agreement to limit global warming, and at a European level as part of the European Climate Law to reduce GHG emissions by at least 55% by 2030 compared to 1990 levels, and to achieve climate neutrality by 2050”.

To support the expansion of renewable electricity generation, the Government has allocated €3.5 billion in equity funding to ESB Networks and EirGrid to enhance grid transmission and distribution infrastructure, which will directly facilitate increased integration of wind energy developments such as the Proposed Project.

Climate Action Plan 2025

The Climate Action Plan 2025 (CAP25) represents the third statutory update to Ireland’s climate roadmap under the Climate Act. Building on the foundations laid by previous plans, CAP25 refines and strengthens the strategies necessary to deliver Ireland’s legally binding carbon budgets and sectoral emissions ceilings. It sets out a clear trajectory to reduce GHG emissions by 51% by 2030 and to achieve climate neutrality no later than 2050.

A cornerstone of CAP25 is the decarbonisation of Ireland’s electricity system through a substantial increase in renewable energy generation. The plan reaffirms ambitious targets for renewable electricity share which includes 80% by 2030, and 50% by 2025. This is to be achieved through the accelerated deployment of onshore wind (6GW by 2025; 9GW by 2030), offshore wind (5GW by 2030), and solar energy (up to 5GW by 2025; 8GW by 2030).

The Proposed Project accords with the provisions of CAP25. The Proposed Project will contribute to the achievement of 80% renewable energy and the delivery of 9GW of onshore wind by 2030. The Proposed Project will reduce Ireland’s reliance on imported fossil fuels for electricity generation and contribute to energy security by generating indigenous renewable wind energy.

European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. No. 274 of 2025)

On 6 August 2025, the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. No. 274 of 2025) were adopted for the purpose of giving effect to Articles 15e(5), 16, 16b, 16c(2), 16d, 16e and 16f of the Renewable Energy Directive III (RED III).

The legislation introduces new decision timelines based on a “completeness check” (ss.34E, 37JB, 295B): 52 weeks for new wind farms, 30 weeks for repowering projects, and one to two years for IROPI cases (two years for projects over 150 kW, one year for projects under 150 kW or repowering). Importantly, renewable energy developments, including related grid and storage infrastructure, are now presumed to be in the overriding public interest.

The development is fully covered by the provisions of the Renewable Energy Directive III (Directive 2023/2413) and is subject to the timelines set out therein.

In order to ensure that the RED III target of 42.5% renewable energy share is achieved, EU Member States must notify their climate and energy objectives, targets, policies, and measures to the European Commission and were established under Regulation (EU) 2018/1999 of the European Parliament and of the Council on the Governance of the Energy Union and Climate Action (“the Governance

Regulation")¹. The Department of the Environment, Climate and Communications (DECC) submitted an updated National Energy and Climate Plan (NECP) 2021-2030 to the European Commission in July 2024. The updated NECP committed to achieving a 43% share of renewable energy in total energy consumption by 2030. In the trajectories set out in the updated NECP, it states that Ireland's proposed trajectory will not be in line with the desired trajectory set out in the Governance Regulation.

Given that Ireland had the lowest share of renewables in energy consumption among EU Member States 2023² (15.3%), the implementation of RED III represents both a legal obligation and an opportunity to remove procedural bottlenecks that hinder critical infrastructure, such as the Proposed Project.

¹ Regulation (EU) 2018/1999 of the European Parliament and of the Council on the Governance of the Energy Union and Climate Action, available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32018R1999>

² https://ec.europa.eu/eurostat/databrowser/view/hrg_ind_ren/default/table?lang=en

Further Information Request

This section of the RFI addresses each of the individual FI items in detail. It should be read in conjunction with the relevant supporting information enclosed with and/or appended to this report. The Commission's FI items have been categorised as follows:

- Biodiversity
- Noise
- Hydrology and Hydrogeology
- Roads and Traffic
- Cultural Heritage
- Landscape and Visual Assessment
- General

The Commission has requested an updated NIS (hereafter referred to as "the Revised NIS"). The Revised NIS is included as Appendix 3 of the RFI.

A copy of the FIR issued by the Commission (ACP Ref. 322154-25) has also been enclosed with this RFI as Appendix 1 in the interest of clarity.

Biodiversity

Further Information Item No. 1

You are required to submit an updated AA Screening Report and NIS which has regard to the changes to the SSCO for the River Barrow and River Nore SAC, as published on the 6th of June 2025.

Response to FI Item No. 1

MKO has provided an Revised Appropriate Assessment Screening Report and Natura Impact Statement (NIS) as a standalone report (included here as Appendix 3 of the RFI). The Revised NIS has considered the changes to the SSCOs for the River Barrow and River Nore SAC, as published on the 6th June 2025, specifically the removal of Nore Freshwater Pearl Mussel (*Margaritifera durrovensis*) [1990] and inclusion of Reefs [1170] as Qualifying Interests (QI) of this SAC. In addition, updates to the conservation objectives for Freshwater Pearl Mussel (*Margaritifera margaritifera*), Estuaries [1130] and Mudflats and sandflats not covered by seawater at low tide [1140] have been captured in the Revised NIS provided. All elements of the FIR relevant to Appropriate Assessment have been captured in the Revised NIS (e.g. Further Information Item No. 2 and Further Information Item No. 3) to ensure that a full and complete assessment is provided.

Conclusion

MKO is satisfied that the Revised NIS has fully considered all changes to the SSCO for the River Barrow and River Nore SAC, as published on the 6th of June 2025, and these updates have not resulted in any fundamental changes to the conclusions of the previously submitted NIS, which stated that

"it can be objectively concluded that the Proposed Project, individually or in-combination with other plans or projects, will not adversely affect the integrity of any European Site".

Further Information Item No. 2

It is noted that Otter is a QI species of European sites within the Zone of Influence (ZoI) of the proposed development (i.e. River Barrow and River Nore SAC [002162]). All aspects of the proposed

development which could result in significant effects on Otter must be considered and assessed within the NIS. Mitigation measures designed to avoid any adverse effects on site integrity must be included and assessed for effectiveness within the NIS. In this regard, the Applicant is requested to submit a revised NIS which includes this information, including details of all Otter activity within all aspects of the proposed development (wind farm site, grid connection etc). Furthermore, the Applicant shall outline in detail their survey methodology for this QI species both within the proposed wind farm site and along the proposed grid connection route to determine its adequacy.

2.1.2.1 Response to FI Item No. 2

Potential effects on Otter are comprehensively assessed in the Revised NIS, included as Appendix 3 of the RFI.

The survey methodology employed to detect signs of Otter during field surveys is provided in Section 3.3.1.2 of the Revised NIS. An additional survey of previously identified potential otter holts within approximately 150m upstream and downstream of any proposed infrastructure, and the proposed HDD location, was carried out on 3rd September 2025. The purpose of this survey was to assess whether any changes to these previously identified potential holts had occurred during the interim period and determine what level of otter activity, if any, these areas are subject to.

The results of the surveys are provided in Section 3.5.3.5. No active Otter holts were recorded within 150m of any proposed infrastructure within the Proposed Wind Farm site or within 150m upstream or downstream of the proposed Horizontal Directional Drilling (HDD) location on the River Nore, along the Proposed Grid Connection underground cabling route. During 2024 surveys, Otter prints were recorded within 110m of the proposed HDD location along the River Nore. Otter prints were recorded approximately 625m upstream of the proposed HDD location under the River Nore as well as 60m upstream of survey location GR-13, along the right-hand bank during 2024 surveys also. No signs of otter, including otter holts, were recorded within 150m upstream or downstream of the HDD location during the updated survey on 3rd September 2025.

The possibility of potential effects on Otter has been examined during the AA Screening Stage with the following potential effects considered and assessed:

- Potential for habitat degradation as a result of the deterioration of surface and ground waters during construction, operational and decommissioning phases
- Potential for habitat loss
- Potential for disturbance to local populations of Otter

The potential for direct habitat loss has been discounted, given the results of surveys undertaken and the lack of suitable otter habitat where habitat loss is expected. A full examination of indirect impacts which could affect Otter, namely effects to water quality resulting in habitat degradation and potential disturbance effects is provided in Section 6.2.1 and Section 6.2.2 of the Revised NIS. Prescribed mitigation measures to avoid or reduce the significance of such effects is presented in Sections 6.2.1.2 and Section 6.2.1.3 of the Revised NIS. In recognition of the fact that otter is a mobile species which could potentially migrate within the site, and that there is suitable habitat for otter in the vicinity of the Proposed Project (i.e. watercourses and associated riparian vegetation), mitigation includes a pre-commencement otter survey which will be undertaken in accordance with best practice guidance prior to the commencement of site works. Mitigation measures to reduce the effects of construction-related disturbance to local otters are also provided.

2.1.2.2 Conclusion

Following the updates made to the previously submitted NIS, MKO is satisfied that all aspects of the proposed development which could result in significant effects on Otter, which is a Qualifying Interest (QI) species for the River Barrow and River Nore SAC, have been identified and comprehensively

assessed, and where required, appropriate mitigation measures have been prescribed to avoid any adverse effects on site integrity.

213

Further Information Item No. 3

The proposed grid connection route includes underground cabling works which will cross beneath the River Nore SPA [004233] which is designated for Kingfisher. It is noted that no information on the baseline noise conditions at this location and predicted noise/vibration levels associated with the HDD are included in the NIS such that potential significant disturbance effects on kingfisher can be determined. In this regard, the Applicant is requested to submit a revised NIS which responds to this issue which includes the provision of baseline noise conditions, noise/vibration levels associated with HDD, timing and duration of works etc. The Applicant shall also clearly outline the survey methodology adopted for Kingfisher along this section of the River Nore to determine its adequacy.

2131

Response to FI Item No. 3

Kingfisher Survey and Results

Since the submission of the planning application, an additional kingfisher survey was undertaken by MKO. In May 2025, a kingfisher survey was conducted at the location where the Proposed Grid Connection would cross the River Nore. Survey methodology followed Cummins *et al.* (2010): the surveyor walked along the river course searching for kingfisher nest holes or suitable nesting banks during daylight hours. The survey encompassed the Proposed Grid Connection underground cabling crossing location and extended approximately 150m upstream and downstream of this location. During the breeding kingfisher survey, no nesting burrows were recorded within the survey area. The majority of bank habitat within the survey area was assessed as unsuitable nesting habitat for kingfisher (i.e. shallow sloping banks; densely overgrown with no exposed substrate or steep/vertical faces present). A minor section (c.10m) of sub-optimal nesting habitat was identified on the western bank, c.45m from the HDD crossing location (where there has been erosion of a section of bank, leaving an exposed sloping soil face extending approximately 1m above water level at the time of survey). A section of suitable nesting habitat was recorded approximately 85m upstream of the cable crossing location. No burrows were recorded at either of these locations.

Noise and Vibration Survey

On the 2nd of September 2025, baseline noise and vibration surveys were undertaken at the Proposed Grid Connection HDD crossing location of the River Nore SPA. Please see Appendix 5 for details. The dominant noise sources was from road traffic, other noise sources audible in the environment included birdsong and foliage rustling. At the noise monitoring location N1 (i.e. the location nearest the proposed drilling), ambient noise levels were measured in the range of 57 to 60 dB. Background noise levels were in the range 41 to 42 dB. Vibration levels were assessed to be imperceptible.

In relation to noise levels associated with HDD, levels vary with, among other things, the site conditions, but are predicted to be similar to existing ambient noise levels, i.e. approx. 62 dB at the riverbank, which is 30m distant from the proposed HDD drilling pit. Please refer to drawing 230502-76FI, included in Appendix 2 of this RFI, for layout and section details of the HDD crossing. The noise levels associated with construction machinery are predicted to be similar but slightly above ambient noise levels at 30m, i.e. the cumulative construction noise level is predicted to be 71 dB.

Table 1: Predicted Cumulative Noise Levels at River Nore HDD Crossing

Item (BS 5228 Ref.)	Plant Noise level at 10m Distance (dB LAeq,T)	Predicted Noise Level (dB LAeq,T) at distance (m)
Distance (m)		30 m
Mini Tracked Excavator with Rock Breaker (C5.2)	83	67
Dumper Truck (C.4.2)	78	62
Wheeled Loader Lorry (C.2.28)	76	60
Asphalt Spreader (C5.30)	75	59
Vibratory Rollers (C.5.30)	75	59
Microtunnelling (Generator) (based on C2.44)	77	61
HGV Movement (C.2.30)	79	63
Cumulative Predicted Construction Noise Level		71

It is noted that once the site of the HDD is prepared there is unlikely to be much machinery noise other than the drill and generator, this should lead to reduced noise levels during these periods. Using the sound power levels for the Vermeer D8x12 and the Vermeer D40x55, the predicted noise level at the rivers edge (30m from the drill pit) is 62 dB LAeq assuming on-time of 100%, i.e. running continuously.

Studies of vibration levels have been conducted for a 450 mm diameter HDD operation in south Dublin (Reilly et al. 2020)³. The operation was on land and during this project vibration limits of no more than 10 mm/s were imposed during the HDD works. The HDD profile was approximately 150 m long and the drill was 9 m below the ground level. The vibration levels recorded were typically less than 1 mm/s with a maximum of 5 mm/s. It is our professional judgment that these vibration levels of >1 mm/s to a maximum of 5 mm/s are representative of what would be expected at the Proposed Grid Connection HDD crossing at the River Nore.

Updated Impact Assessment

There is the potential to cause disturbance to kingfisher where the Proposed Grid Connection underground cabling route crosses the River Nore SPA, approximately 1km north-west of Ballyragget. The crossing will be via HDD and has been designed to pass cabling beneath the River Nore. The drilling has the potential to generate noise and vibration that could lead to a short-term (indirect) disturbance effect on kingfisher.

The development context is an important consideration when assessing the potential for noise and vibration effects. Sudden loud noises in a quiet environment have the greatest potential to cause

³ Studies of vibration levels have been conducted for a 150 mm diameter HDD operation in south Dublin, Ireland (Reilly et al. 2020).

disturbance (Cutts, 2013⁴). The drilling and construction noise levels at the HDD crossing point of the River Nore are predicted to be 62-71 dB at the riverbank, which is 30m distant. This is a moderate to low noise stimulus as per Cutts criteria (2013). At the higher end of the predicted vibration range, i.e. at 5mm/s there is the potential for disturbance.

Disturbance (visual and noise) has been observed in this species within 50-100m (Goodship & Furness, 2022). There is, therefore, a noise/vibration stimulus within this potential zone of disturbance, i.e. within 50-100m.

As previously outlined, there are no kingfisher breeding sites within this potential zone of disturbance; therefore, no adverse effects on breeding sites are predicted for the SPA.

While it can not be ruled out that kingfisher forage within the zone of potential disturbance (i.e. within 50-100m of the HDD location), the likelihood is that they do not. The rationale for this is that there is an uneven distribution of the species in the River Nore. As outlined in the SPA site conservation objectives⁵, in 2010, densities of 0.10-0.14 territories/km length of channel were recorded for this site (Cummins et al., 2010). Despite the low rate of occurrence in a given 1km length of channel, following the precautionary principle, foraging can not be ruled out locally.

The noise levels, which are predicted to be similar to existing ambient noise levels, are unlikely to give rise to an adverse effect on foraging kingfisher. However, there is a possibility of disturbance from vibration at the high end of the predicted range (5mm/s). Without intervention, following the precautionary principle, adverse effects can not therefore be ruled out for the foraging kingfisher of the SPA at the HDD crossing point.

To avoid potential adverse effects, it is proposed to seasonally constrain the HDD works, which would thereby (effectively) eliminate any possibility of an adverse effect for kingfisher during the breeding season. Following this approach, it is proposed to undertake the proposed HDD underground crossing of the River Nore SPA outside the Kingfisher breeding season, i.e. outside March and July inclusive.

Notwithstanding the above, a pre-commencement kingfisher survey will be undertaken prior to any works to confirm the absence of kingfisher nest sites within 100m of the crossing point. If breeding sites are identified and occupancy confirmed, all construction works within 100m will be suspended until the nest is no longer occupied.

2.1.3.2 Conclusion

The baseline noise survey conducted at the River Nore crossing, and predicted noise levels as a result of operation of machinery and the drill generator are not dissimilar to the existing baseline noise levels, which features noise interference from vehicles commuting on the nearby N77, in which the launch pit will be located. The noise levels are classified as moderate to low noise stimulus as per Cutts criteria (2013) and is therefore not expected cause any potentially significant effects on the Kingfisher, nor the SPA. While vibration levels cannot be determined, levels recorded in a south Dublin study reached a maximum of 5 mm/s, which could potentially disturb foraging Kingfisher. However, mitigation measures outlined above will eliminate any possibility of an adverse effect for kingfisher during the breeding season.

2.1.4 Further Information Item No. 4

You are requested to submit a detailed site layout plan for the crossing of the River Nore where HDD is proposed. The submitted plan shall clearly identify the locations of the launch and reception pits on either side of the river along with details of all the proposed mitigation measures. A similarly detailed

¹ Waterbird Disturbance Mitigation Toolkit Informing Estuarine Planning & Construction Projects
⁵ https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CC001233.pdf



layout plan shall also be provided for all other locations where HDD is proposed along the grid connection route

21.4.1 Response to FI Item No. 4

Please see drawing 230502-76FI of Appendix 2 for details on the proposed HDD crossing under the River Nore.

21.5 Further Information Item No. 5

You are requested to submit an indicative landscape plan and section diagram for the proposed riparian buffer along the Tullaroan Stream (known locally as the Kilmanagh/Tullaroan River). This plan shall provide details of the proposed planting and protective fencing (if required).

21.5.1 Response to FI Item No. 5

Please see drawing 230502-78FI of Appendix 2 for an indicative landscape plan and section diagram for the proposed riparian buffer.

21.6 Further Information Item No. 6

You are requested to submit a site-specific plan and section diagram of the bridge crossing over the Tullaroan Stream between T6 and T7. The plan and section diagram shall include spot levels for the riverbed and banks and shall clearly illustrate the relationship between the proposed clearspan bridge and the new access roads on either side of the watercourse. The plan shall also include details of the relevant mitigation measures required for the protection of water quality.

21.6.1 Response to FI Item No. 6

Please see drawing 230502-52FI of Appendix 2 for a plan and section diagram of the clearspan crossing over the Tullaroan stream.

21.7 Further Information Item No. 7

Noting the width of the existing access road leading from the site entrance on the L1009 (Kilmanagh Village) to T7 and the dimensions provided for the proposed and upgraded access roads (including its associated drainage), concerns are raised that the proposal will result in the loss of additional hedgerows and treelines along this route. This includes a grouping of mature trees at the location where the new access road is proposed. In addition, it is noted that there are treelines and dense hedgerows that entirely enclose a small field located directly to the north-east of T5, adjacent to the proposed spoil management area. The extent of hedgerow and tree loss would appear to be under reported given the extent of new access tracks proposed at this location. The Applicant is therefore requested to respond to this issue. Should further hedgerow removal/tree loss be required, this shall be clearly identified, and the extent of habitat loss should be updated within EIAR accordingly. It is also noted that the Applicant's Bat Survey Report (Appendix 6-2) should be updated to have regard to the additional hedgerow removal/tree loss on site, if required.

21.7.1 Response to FI Item No. 7

The access track and associated works areas, including the northern and southern site entrances and the proposed substation location, were reviewed in detail. Additional areas of hedgerow and linear habitat loss have been identified. These comprise:

- > A 7 m section of heavily managed hedgerow at northern Site entrance (Plate 1);
- > A 15 m section of hedgerow at the entrance to the temporary construction compound proposed for temporary removal with reinstatement following construction (Plate 2);
- > A 27 m section of hedgerow at the temporary site entrance to the south proposed for temporary removal with reinstatement following construction (Plate 3);
- > A 72 m section of treeline along the access route in the south of the site (Plate 4);
- > A 10 m section where the access track meets the conifer forestry block south of T7 (Plate 5);
- > A 16 m section of heavily managed, low-level hedgerow will require removal at the proposed substation entrance (Plate 6).

At the spoil management area to the east of the T5 access track (Plates 7 & 8), the hedgerow loss appears to have been accurately quantified in the EIAR (see Figure 6-1 of the Bat Report and Figure 1-1 of the BMEP). This assumes that loss is confined to the road and hedgerow intersections, with no removal required where the access track runs parallel to the hedgerow. Figures 1 and 2 below illustrate the extent of hedgerow loss stated in the EIAR and the extent of additional hedgerow loss respectively.

2172 Conclusion

In conclusion, approximately 120 m of additional hedgerow loss has been identified. This has been incorporated in the mapped figures and updated within the Revised NIS (Appendix 3) and Revised Bat Survey Report (Appendix 4 of this RFI) ensuring that the total habitat loss is accurately reflected across all relevant assessments. The revised total loss of linear vegetation (1,508m) is an accurate reflection of the extent of linear vegetation removal expected within the Proposed Wind Farm site. The inclusion of this short additional extent of hedgerow loss is not of a significant magnitude in the context of the overall assessment and does not alter the findings, conclusions, or significance of effects reported in the EIAR.



Map Legend

- EIAR Site Boundary
- Linear Vegetation Loss (as previously submitted)
- Proposed New Roads
- Existing Roads to be Upgraded
- Proposed Turbine Locations
- Proposed Hardstands
- Proposed Onsite Substation
- Temporary Construction Compound
- Proposed Borrow Pits
- Proposed Spoil Management Areas

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Drawing Title

Linear Vegetation Loss as per EIAR submitted

Project Title
Briskalagh Renewable Energy Development

Drawn By
CK

Checked By
SM

Project No.
230502-h

Drawing No.
Figure 1

Scale
1:18,000

Date
2025-10-22

MKO

Planning and Environmental Consultants
Tulla Road, Galway
+353 (0)91 950444
email: info@mkogalway.ie
Website: www.mkogalway.ie

Map Legend

- EIA Site Boundary
- Linear Vegetation Loss (as previously submitted)
- Additional Permanent Linear Vegetation Loss
- Temporary Linear Vegetation Loss
- Proposed New Roads
- Existing Roads to be Upgraded
- Proposed Turbine Locations
- Proposed Hardstands
- Proposed Onsite Substation
- Temporary Construction Compound
- Proposed Borrow Pits
- Proposed Spoil Management Areas

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Drawing Title	
Additional Linear Vegetation Loss	
Project Title	
Brisklagh Renewable Energy Development	
Drawn By	CK
Checked By	SM
Project No.	230502-h
Figure	Figure 2
Scale	1:18,000
Date	2025-10-22

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Plate 1 Heavily managed 7 m hedgerow at northern Site entrance proposed for removal



Plate 2 15 m hedgerow section (right) at entrance to temporary construction compound – proposed for removal



Plate 3 Heavily managed 27 m hedgerow at site entrance (L1000) – proposed for removal and reinstatement



Plate 4 72 m section of tree line to be removed to facilitate access road in the south of the site



Plate 5 10 m section of habitat loss at conifer forestry block south of T7 for access road, with new edge habitat created along the new road



Plate 6 16 m substation entrance location





Plate 7 Hedgerow surrounding spoil management area adjacent to T5. No additional removal required.



Plate 8 Additional view of hedgerow enclosing spoil management area at T5. No additional removal required.

216

Further Information Item No. 8

You are advised that updated guidance has recently been published from DHLGH on Regulation 54 derogation process for protected species listed on Annex IV (Applications for Regulation 54 Derogations for Annex IV species, Guidance for Applicants, Version 1.0, 1 July 2025). In summary, this guidance requires any derogation to be granted before the approval of the consent to the proposed activity. Noting the number of mature trees on site that have been identified as presenting potential roosting features and which require removal, the Applicant shall satisfy themselves that they can comply with the updated guidance. This may necessitate further surveys of the trees in question to determine whether a derogation may be required.

2181

Response to FI Item No. 8

As part of the 2023 bat surveys presented in Appendix 6-2 of the EIAR, trees within the site were assessed from ground level in accordance with best practice guidance (Collins, 2016). Following the FIR, a more detailed assessment was undertaken in August 2025 of all the trees proposed for removal to facilitate the bat felling buffers and the infrastructure footprint, including the site entrance (L1009), temporary construction compound, spoil management area, substation entrance, and access track to T7. This assessment was carried out in line with the updated Collins (2023) guidance, supported by Bat Tree Habitat Key (2018).

The survey was undertaken by licenced bat ecologist Ryan Connors (M.Sc., B.Sc., DER-BAT-2025-119). The methodology included ground-level inspections supplemented by use of binoculars, a thermal camera, an endoscope, high powered torch and a ladder where necessary. Any potential features identified during the inspection were assessed at height using a torch/endoscope/thermal camera to check for roosting suitability or evidence of bat use. This enabled a comprehensive examination of Potential Roost Features (PRFs).

In total, 83 no. trees were inspected across the Site. The majority of trees comprised ash affected by ash dieback, often with areas of ivy cover. Features noted during the initial 2023 survey, such as broken branches, knot holes, and cankers, were found upon close-up inspection to be superficial, with no actual cavities or crevices capable of supporting roosting bats.

Using Table 4.2 of the 2023 Collins guidance, all inspected trees were classified as *None* (i.e. either no PRFs or unlikely to be any) due to their size and/or lack of suitable features. No PRF-I or PRF-M trees were identified within the bat felling buffers (Plates 9-19) or along the proposed infrastructure footprint (Plates 20-28). The plates provided are a representative sample of the trees inspected.

218.2 Conclusion

A total of 83 no. trees proposed for removal were subject to detailed assessment, and none were found to support features suitable for roosting bats. On this basis, MKO are satisfied that a derogation licence is not required. As outlined in Appendix 6-2, Section 6.1.4, Confirmatory Pre-construction Tree Survey, the applicant commits to carrying out a precautionary survey prior to felling to confirm the updated baseline status of trees. This does not represent a lacuna in the survey effort but reflects standard best practice, recognising that tree condition can change over time.



Plate 9 Sessile oak tree with ivy cover within T3 buffer



Plate 10 Close inspection showed no visible PRFs



Plate 11 Sessile oak with broken branch within T3 buffer



Plate 12 Broken branch does not contain roosting suitability



Plate 13 Ash tree with canker within T3 Buffer



Plate 14 Close up inspection revealed no roosting suitability





Plate 15 Ash tree within buffer at T6. No visible PRFs



Plate 16 Close-up of oak; no PRFs observed and unlikely to be present (assessed as None)



Plate 17 Ash tree with wound within T6 buffer



Plate 18 Close up inspection revealed no roosting potential



Plate 19 Stand of dead ash trees with ivy cover within T6 buffer; assessed as None



Plate 20 Existing Road to be upgraded at access track to T7





Plate 21 Ash trees to the west of access track – No PRFs identified



Plate 22 Stand of ash trees to the east of the access track – No PRFs identified.

219

Further Information Item No. 9

It is noted that there are potential roosting features present within a number of the bridges along the proposed grid connection route (as per Appendix 6-2 of the EIAR). A combination of flatbed formation and horizontal directional drilling are proposed at these bridges. Notwithstanding the Applicant's response in their grounds of appeal, the level of noise and vibration associated with the proposed works is unclear. Uncertainty therefore remains regarding the potential impact of the works on roosting bats and whether a derogation may be required. In this regard, the Applicant is requested to respond to this matter.

2191

Response to FI Item No. 9

As part of the survey effort outlined in Appendix 6-2 Bat Report (See Appendix 4 of this RFI for Revised Bat Survey Report), all watercourse crossings associated with the Proposed Grid Connection were assessed for bat roost potential in 2024. A total of eight structures (bridges/culverts) were identified as presenting features with some potential for use by bats. These were subject to inspections using a thermal camera, an endoscope and a torch, with roosting potential categorised in line with Collins (2023) guidance. No evidence of roosting bats was identified during these surveys.

Following the FIR, a detailed re-inspection was undertaken in August 2025 of all eight crossings. This survey was carried out by licensed MKO bat ecologist Ryan Connors and involved the use of binoculars, a thermal camera, high powered torch, a ladder, and an endoscope to facilitate a comprehensive examination of the structures including any crevices, expansion joints, and bridge arches, where accessible. Improved access to WC7 in particular allowed for a closer inspection than was possible during the 2024 effort.

No evidence of roosting bats (droppings, staining, feeding remains, or live specimens) was identified during the inspection survey. While no evidence of roosting was identified during either the 2024 or 2025 inspection surveys, all eight crossings were reconfirmed as having Low suitability (Plates 23-32). This is due to the presence of a small number of potentially suitable gaps/crevices for opportunistic use by individual bats.

It is noted that works at these crossings will either be confined to the existing road infrastructure or completed using temporary construction methods such as horizontal directional drilling (Launch pits set-back from crossing infrastructure) or flatbed formation within the existing road build-up over the structure. No works are proposed on the underside or abutments of the crossing infrastructure. No evidence of bats or roosting activity was recorded at these locations; therefore, a derogation licence is not required, and no adverse impacts on bats are anticipated. No evidence of bats or roosting activity



was recorded at these locations; therefore, a derogation licence is not required, and no adverse impacts on bats are anticipated.

On a precautionary basis, and in line with industry best practice, confirmatory pre-construction inspections will be carried out at all crossings assessed as having *Low* suitability. Surveys undertaken in March 2024 and reinspected in August 2025 confirmed that no bat roosts were present at any of the watercourse crossings (see Appendix 4 of this RFI, Section 4.3.1.2), however baseline conditions can change over time. These inspections will be undertaken by a suitably qualified ecologist immediately prior to works to ensure no bats are roosting in the structures and to safeguard compliance with relevant legislation. If roosting bats are identified, a derogation licence will be obtained from NPWS and mitigation measures prescribed by a licensed ecologist before works proceed. This requirement does not represent a lacuna in the survey assessment but reflects standard best practice and the precautionary principle.

Given the temporary nature of the works, the setback distances for HDD launch pits and the fact that flatbed formation cabling installation will take place within the existing road build-up over the structure, no significant effects on bats are anticipated. Accordingly, a derogation licence is not required.



Plate 23 WC4 Stone Arch Bridge - Small crevices in stonework but otherwise solid construction. No evidence of bats. Low roost potential



Plate 24 WC5 Stone Arch Bridge - Ivy cover and small gaps present, but underside is smooth concrete. No evidence of bats. Low roost potential



Plate 25 WC6 Stone Arch Bridge - Some cracks under arch offering limited opportunity. No evidence of bats. Low roost potential

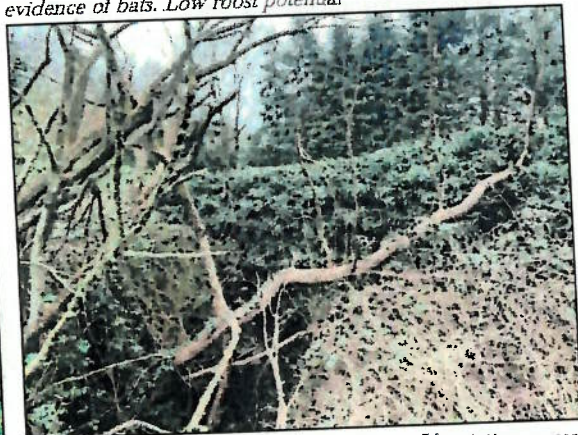


Plate 26 WC7 Stone Arch Bridge - Dense Vegetation cover



Plate 27 WC7 Small gaps and crevices underneath dense vegetation. No evidence of bats. Low roost potential



Plate 28 WC7 Smooth concrete underside - no roost potential in bridge arch





Plate 29 WC9 Stone Arch Bridge - Dense ivy on one side; cracks and crevices present. No evidence of bats. Low roost potential



Plate 30 WC11 Stone Arch Bridge - Minimal cracks and ivy cover present. No evidence of bats. Low roost potential



Plate 31 WC12 Stone Arch Bridge - Cracks and ivy present above/below bridge. No evidence of bats. Low roost potential



Plate 32 WC13 Stone Arch Bridge - Crevices and ivy cover noted. No evidence of bats. Low roost potential



2110

Further Information Item No. 10

You are requested to provide a rationale for the exclusion of amphibians or reptiles as KERs given that suitable habitat exists within site and the absence of dedicated surveys for these species. Should amphibians or reptiles be included as KERs, the EIAR should be updated to include suitable mitigation measures.

2110.1

Response to FI Item No. 10

Key Ecological Receptors (KERs) were selected in accordance with guidance contained in *Guidelines for Assessment of Ecological Impacts of National Road Schemes* (NRA, 2009), in line with industry best practice. The NRA guidance states that KERs must occur within the zone of influence of a Proposed Project and are “both of sufficient value to be material in decision making and likely to be affected significantly”.

Whilst no evidence of populations of reptiles or amphibians were recorded in the vicinity of the Proposed Project, it is acknowledged that suitable supporting habitat, in the form of watercourses and drainage ditches, exists within the Proposed Wind Farm site and wider environs. The Proposed Project is not anticipated to result in a significant amount of loss of suitable supporting habitat given the availability of suitable supporting habitat in the locality, the loss of such habitat is not considered significant to the degree that it would affect populations of reptiles or amphibians, where they occur, at a local level or greater. In consideration of this, reptiles and amphibians are not regarded as KERs for the Proposed Project and are therefore not considered further in the assessment presented in the Biodiversity Chapter of the EIAR.

Any potential effects with regards the deterioration of surface water quality are assessed in Section 6.7.2.1.1 and 6.7.3.1.1 of the Biodiversity Chapter which forms part of the EIAR submitted.

2111

Further Information Item No. 11

You are required to submit a restoration plan (plan and section diagrams) for the proposed borrow pit.

2111.1

Response to FI Item No. 11

Please see drawing DANU-BSK-D004.1FI of Appendix 2 for details on the borrow pit restoration plan.

22

Noise

22.1

Further Information Item No. 1

In terms of cumulative noise impacts associated with the construction phase, it is noted that no detailed analysis of other projects has been provided which would assist in establishing their potential to contribute to cumulative effects in combination with the subject proposal. An example of which includes the multiple grid connection routes connecting wind farms in the area to Ballyragget 110kV Substation. The Applicant is therefore requested to respond to this issue.

2211

Response to FI Item No. 1

Grid Connection Projects

The long list of cumulative projects from Appendix 2-3 of the EIAR has been reviewed to ascertain proposed grid connections for developments connecting to the Ballyragget 110kV Substation, which include the following:

- KCC 21627 Grid Connection to Farranrory Wind Farm, amended by KCC 2360248;
- KCC 2360330 Grid Connection to a Solar Farm at Ballyconra;
- KCC 2560418 Grid Connection to Seskin Wind Farm, and
- KCC 2460241 Battery Energy Storage System (BESS) at Moatpark, Ballyragget

The applicant confirms that if the Proposed Project is approved, at construction stage, the appointed contractor will coordinate with the contractors for other projects to ensure that works do not coincide so as to cause cumulative significant noise or vibration effects at noise-sensitive locations (NSL's) along the Proposed Grid Connection underground cabling route.

Wind Farm Projects

There are no other permitted wind farm projects in the cumulative assessment i.e. wind farms yet to be constructed, therefore no cumulative wind farm construction effects are likely

2.2.2 Further Information Item No. 2

You are required to submit omni-directional noise predictions for each NSL in tabular format for the proposed development only.

2.2.2.1 Response to FI Item No. 2

Appendix 6 of this response document presents predicted omni-directional noise levels in tabular format due to the Proposed Wind Farm alone.

2.2.3 Further Information Item No. 3

You are required to submit the predicted cumulative omni-directional turbine noise levels for each NSL in tabular format, which illustrates both the day and night criterion and identifies any relevant excess.

2.2.3.1 Response to FI Item No. 3

Appendix 7 of this response document presents predicted cumulative omni-directional noise levels in tabular format.

2.2.4 Further Information Item No. 4

It is acknowledged that you have submitted a map of the study area which shows the predicted cumulative noise level contours at 9m/s wind speed (i.e. Appendix A of Appendix 3 of the First Party Appeal prepared by AWN Consulting) and all NSLs included within Appendix 12-7 (Predicted Cumulative Noise Levels) appear to have now been identified. From a review of the study area a map, it is noted that NSL 270 & 275 are relocated within the 40dB(A) contour associated with the Foyle Wind Farm. However, a predicted noise level of 35.9dB(A) and 35.3dB(A) has been indicated at these NSLs respectively at 9m/s within Appendix 12-7 of the ELAR. You are therefore requested to clarify these apparent discrepancies

2.2.4.1 Response to FI Item No. 4

A new noise contour map has been provided with corrected NSL references. Please see Figure 3 below:

**Briskalagh Renewable
Energy Development,
Co. Kilkenny**

Figure 3

0 400 800 m



NSLS

Proposed Turbines

Foyle Turbines

Noise Contour at 9 m/s

35 dB(A)

40 dB(A)

45 dB(A)

50 dB(A)

55 dB(A)

OpenStreetMap



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AWN Job Reference: 237501.0460

Issue Date: 03/10/2025



2.3 Hydrology and Hydrogeology

2.3.1 Further Information Item No. 1

You shall provide a robust rationale for the adequacy of the trial pits provided across the site, noting their depth relative to the depth of the foundations for the proposed turbine bases.

2.3.1.1 Response to FI Item No. 1

Section 2.1 of Appendix 8 comprehensively provides rationale as to the appropriateness of the level and scope of site investigation at the Site and contends that the site investigations undertaken are more than sufficient to characterise the baseline geological environment. It should also be noted that further Site investigation has been undertaken in the vicinity of T7 and is comprehensively addressed in Section 2.3 of Appendix 8.

2.3.2 Further Information Item No. 2

Concerns are raised regarding the extent of site investigations undertaken for the proposed borrow pit given its proximity to the aquifer and nearby watercourse on site. Noting its location relative to this regionally important gravel aquifer, you are required to establish the impacts of such an excavation on the potential to impact surface water and groundwater flows in the area. Further detailed site investigations shall be provided to fully establish a conceptual site model for flow regimes in this area of the site.

2.3.2.1 Response to FI Item No. 2

Section 2.2 of Appendix 8 addresses concerns regarding the proposed borrow pit and the local hydrogeological regime. To summarise, the proposed borrow pit location is adequately distant from the sand and gravel aquifer (993m) and nearby streams (196m at closest point), a water monitoring well has been drilled at the proposed borrow pit location on the 7th of August 2025, the proposed borrow pit will not significantly alter the existing hydrogeological regime and drawdown impacts will not occur at the proposed borrow pit location. To conclude, when taking into account the existing groundwater and surface water conditions, as well as best practice mitigation measures which will be employed at the proposed borrow pit location, there is no potential for significant impacts on local watercourses nor the sand and gravel aquifer. Please see Section 2.2 of Appendix 8 for further detail.

2.3.3 Further Information Item No. 3

Concerns are raised regarding the complete absence of site investigations at the location of T7. Notwithstanding the rationale provided by the Applicant within the Chapter 9 of the EIAR, the absence of data prohibits an adequate assessment of the potential impacts of the development on both groundwater quality and flow dynamics and surface water flows and quality at this location. Therefore, you are required to undertake further site investigations proximate to the location of T7 to address this issue.

2.3.3.1 Response to FI Item No. 3

Section 2.3 of Appendix 8 details the additional site investigations which were completed in August 2025 within 90m of T07. A slow water strike was encountered in the clay deposits at a depth of 5.5mbgl with a more significant strike at 11.5mbgl. A permeability test determined that the permeability value was relatively high at 1.79×10^{-4} m/s. However, the results of the site investigation do not alter the conclusions presented in the EIAR, which assessed both gravity and piled foundations of which a piled foundation will most likely be implemented at T07. To summarise, the construction of T07 with piled

foundation will not have any significant effects on the receiving land, soil, geology or water environment. Please see Section 2.3 of Appendix 8 for further detail.

2.3.4 Further Information Item No. 4

You are required to provide an assessment pertaining to all potential impacts on surface water flows and/or groundwater flows as a result of dewatering associated within the excavations for the turbine foundations.

2.3.4.1 Response to FI Item No. 4

Section 2.4 of Appendix 8 clarifies that an assessment of the effects of dewatering at the turbine bases on surface and groundwater flows is presented in Sections 9.5.2.5 and 9.5.2.5 of the EIAR and provides a summary of reasons as to why no effects in surface or groundwater flows will occur. Please see Section 2.4 of Appendix 8 and Section 9.5.2.5 and 9.5.2.5 of the EIAR for further information.

2.3.5 Further Information Item No. 5

It is noted that the crossing of the Tullaroan Stream and some access roads are proposed to be located within a flood zone (National Indicative Fluvial Mapping). In addition, there is a history of flood events immediately downstream of the site within the village of Kilmanagh. In this regard, you are required to submit an updated Flood Risk Assessment (FRA) which includes detailed site-specific hydraulic modelling of the Tullaroan Stream which should examine the potential impact on the existing flood plain or on flood risk elsewhere downstream. The updated FRA shall also have regard to the alterations that have been undertaken to the Tullaroan Stream within the boundaries of the site

2.3.5.1 Response to FI Item No. 5

Fluvio R&D Limited have produced a detailed site-specific hydraulic flood model along the Kilmanagh/Tullaroan River, which can be viewed in Appendix 9. The detailed site-specific flood modelling concludes that there is no significant change to flood water levels between the existing baseline flood scenario and the future flood scenario which includes the Proposed Wind Farm. There is no significant change in the flood extents or the flow rates between the existing baseline flood scenario and the future flood scenario which includes the Proposed Wind Farm infrastructure. Channel alterations and watercourse crossings within the Site are considered within the model.

2.4 Roads and Traffic

2.4.1 Further Information Item No. 1

With the exception of the concrete deliveries for the turbine foundations (7no.days) and the delivery of the abnormally sized loads (19no.nights), all other vehicles are proposed to access the wind farm site via the new junction proposed from the L5024 to the north. As per Figure 15- of the EIAR, deliveries and construction traffic will access the site from direction of Kilkenny City via the L1007. Vehicles will pass through the village of Tullaroan and then continue south along the L5023, before entering the site via the L5024. To minimise the impact on the local road network, it has been proposed that all vehicles leaving the site will turn right when exiting the site and continue along the L5024 until it meets the L1010. Traffic will then continue south until it meets the R695 and from there, travel east in the direction of Kilkenny City. It is noted that the link flow assessment has been prepared for the section of the turbine delivery route, only (i.e. 7 no. days and 19 no. nights as per above). It would therefore appear that the additional volumes of traffic through the settlement of Kilmanagh would be significantly less than what has been depicted within the link flow assessment. However, given the volume of traffic that will utilise the Alternative Route' as per Table 15-15 of the EIAR (i.e. General construction + grid

connection construction(222days),and Turbine delivery(standard HGVs) + grid connection construction (7days)), you are required to demonstrate that the surrounding local road network can adequately cater for the additional traffic generated during the construction phase of the proposed development.

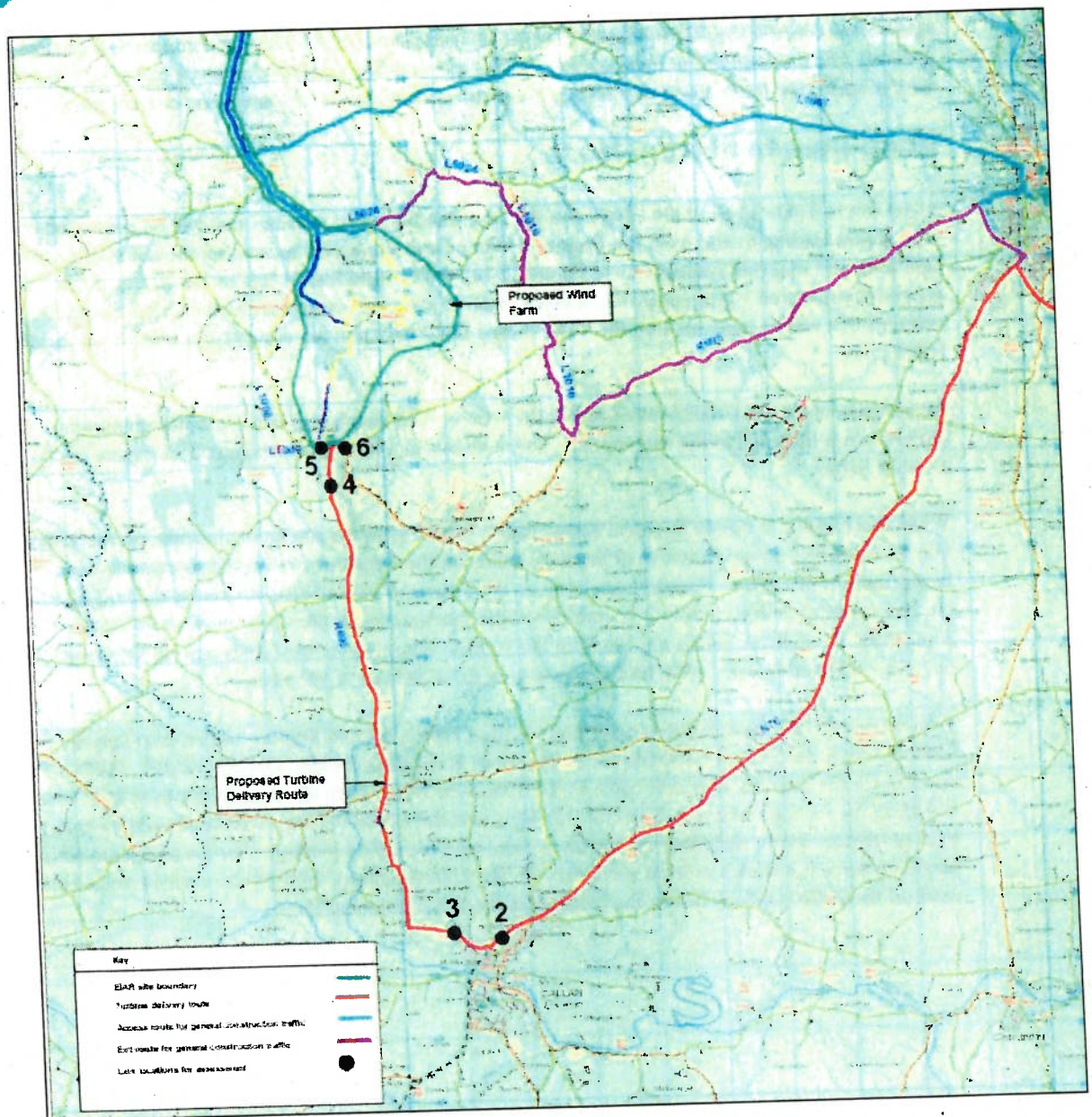
2.4.1.1 Response to FI Item No. 1

As set out in Table 15-15 of the EIAR, it is the case that the traffic volumes that will be generated on the local routes leading to and from the Proposed Wind Farm site access located on the L5024 (shown in light blue and magenta respectively in Figure 15-1a) will be significantly less on the 222 days that general construction + grid construction takes place (+ 123 pcus) compared to the additional traffic volumes that will be generated on the TDR during the 7 days that the concrete foundation are poured (+454 pcus).

An assessment for the L1009 located just to the west of Kilmanagh and which a traffic count was undertaken is included in the assessment. This is shown as Link 5 in the extract from Figure 15-2b inserted below.

While this location is not on the local access routes to and from the site access junction on the L5024, it may be taken to be representative of the local roads on these routes in terms of link capacity and background traffic flows. Based on site visits to the Proposed Wind Farm site access on the L5024 and on the proposed delivery routes it is considered that background traffic levels on the local roads comprising the delivery routes are less than the volume observed on the L1009 west of Kilmanagh. The forecast construction year, 2028, traffic volumes on the L1009 are 1,320 pcus.

With respect to link capacity and road standard the L1009 is a Local Primary with a link capacity of 5,000 pcus per day (Based on Table 6.1 of TII Rural Road Link Design, DN-GEO-03031, 2017). This is the case for the majority of access route to the Proposed Wind Farm site access (shown in light blue), including the local primary roads L1007 (12.6km), and the L1008 (0.6km), with short sections being local secondary roads, including the L5023 (1.1km) and the L5024 (0.8km). For the exit route (shown magenta) there is a stretch of local secondary on the L5024 (2.6km), followed by a stretch local primary road on the L1010 (4.3km) before the route joins the R695 Regional Road.



Extract from Figure 15-2b of the EIA

Based on professional judgement, the capacity L1009 is representative of the capacity of the local roads accessing and exiting the site, from the assessment presented in the EIA, the following may be stated:

- For 222 days when the general construction of the wind farm will take place at the same time as the construction of the Proposed Grid Connection underground cabling route, an additional 123 pcus will travel on the delivery route to the site, resulting in a 9.3% increase in traffic volumes (EIA Table 15-20).
- For 7 days when deliveries are made to the site for smaller turbine components using standard HGVs at the same time as grid construction takes place, an additional 85 pcus will travel on the local road network, resulting in a 6.4% increase in traffic volumes (EIA Table 15-21).
- For background traffic levels the local road network will operate at 26% of link capacity, increasing to 29% on the 222 days that general construction takes place at the same time as grid construction, and at 28% of link capacity on the 7 days that standard HGVs deliver small turbine components at the same time as the grid construction continues. (Note:

Taking a precautionary approach, it has been assumed that the grid construction works on the L5023 and L1008 local roads will overlap with the delivery of general construction materials for the construction of the Proposed Wind Farm, however, the grid construction works on those local roads will be scheduled such that there is minimal overlap with the delivery of general construction materials).

While the above applies to the majority of the delivery routes on the local road network, there are locations where the carriageway characteristics narrow to short stretches of one-way operation.. While there is no existing guidance in Ireland with respect to the link capacity for such situations. Reference is made to a UK Department for Transport Traffic Advisory Leaflet 2/046 where it is recommended that a maximum hourly capacity for a single lane road with passing opportunities is 300 vehicles per hour. Based on this, a conservative 24-hour capacity of 3,000 PCUs (10 peak hours) per day is adopted. At locations where this occurs on the local road network, the above third bullet point reads as follows;

- For background traffic levels the *constrained sections* of the local road will operate at 44% of link capacity, increasing to 48% on the 222 days that general construction takes place at the same time as grid construction, and at 47% of link capacity on the 7 days that standard HGVs deliver small turbine components at the same time as the grid construction continues.

In addition to the assessment above, as set out in the EIAR the following traffic management measures are proposed to ensure that the impact of the additional traffic that will be generated on the local road network will be minimised during the construction stage;

- Introduction of one-way system on local road network, as described in Section 15.1.2.3 and Figure 15-1b of the EIAR, in order to ensure that HGV trips generated by the Proposed Project do not meet travelling in opposite directions.

And as set out in Sections 15.1.12.5.1 and 15.1.12.5.2 of the EIAR;

- The introduction of temporary traffic management measures at the L5024 access junction, including temporary road signs and the presence of flagmen.
- Discussions and agreement with the Local Authority with respect to any additional traffic management measures required on the delivery routes to and from the access junction on the L5024.
- Pre and post construction condition surveys on the delivery routes and the re-instatement of all road surfaces and boundaries to predevelopment condition, also to be agreed with the Local Authority.

Based on the above, with the introduction of the mitigation measures proposed, it is concluded that the local road network will accommodate the additional traffic that will be generated on the local road network during the construction stage of the Proposed Project.

2.4.2. Further Information Item No. 2

Full road closures and diversions are proposed for Section Nos. 5&6 (Table 15-29 of the EIAR) of the proposed grid connection route. This comprises a c.8.1km stretch of the R694 between Freshford Village and the N77 and it is confirmed that this portion of the route will be subject to road closures for c.81 days. Noting that the R694 is a key route linking Freshford to Ballyragget and the uncertainty regarding the adequacy of the diversion routes to cater to significant increases in commercial traffic (notably the L1810 and L1811 for Section 5 and the L1811 for Section 6), you are required to consider whether full road closures along this route can be avoided or significantly minimised given that work

⁶ <https://tsrgd.co.uk/pdf/tal/2004/tal-2-04.pdf>

zone works will typically vary from 100m to 200m in length. Where diversions cannot be avoided, you shall demonstrate that the indicative diversion routes can adequately cater for two-way traffic.

24.21 Response to FI Item No. 2

A precautionary scenario of a road closure being required at the point of construction along the full length of Sections 5 and 6 on the R694 of the Proposed Grid Connection underground cabling route was adopted in the assessment of the potential traffic impacts, as presented in Section 15.1.7 of the EIAR. The traffic management measures required to be implemented for each location of the Proposed Grid Connection underground cabling route will be prepared by the Applicant in consultation with the Local Authority and will likely include significant stretches of the R694 where it will be feasible to retain 2-way operation by means of a "stop & go" arrangement.

With respect to the diversion routes identified and assessed in Section 15.1.7 of the EIAR, it is stated that the potential diversion routes identified during the construction of the Proposed Grid Connection underground cabling route are examples of routes that may be used, and are identified for the purpose of assessing the potential impacts to local traffic. Prior to the construction of the Proposed Grid Connection underground cabling route, the final diversion routes that will be used during the construction of the various sections of the cabling route will be agreed with the Local Authority. The routes identified are based on the shortest feasible diversion routes available, but in practice, alternative routes of a similar or higher standard may be considered the preferred solution as part of the detailed traffic management plan for the construction of the Proposed Grid Connection, with agreement of the Local Authority.

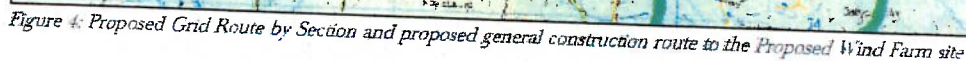
24.3 Further Information Item No. 3

During the proposed road closures and diversions within Section Nos.1 and 2 (Table 15-29) of the proposed grid connection route, you shall clarify how construction access to the site via the L5024 is to be maintained and demonstrate that the indicative diversion routes can adequately cater to the volumes of construction traffic during this period (i.e. 58 no. days).

24.31 Response to FI Item No. 3

The proposed general construction route to the Proposed Wind Farm site, as shown in Figure 15-1a of the EIAR, is shown together with Sections 1 and 2 of the Proposed Grid Connection underground cabling route, as shown in Figure 15-4a of the EIAR, and reproduced in Figure 4 below. With this information combined, it may be seen that there is just one part of Section 2 with a distance of approximately 1.6km that is common to both the general construction route accessing the Proposed Wind Farm site and the Proposed Grid Connection underground cabling route. It is estimated that this section of the underground cabling route will take 16 days to construct.

The Applicant commits that the construction schedule will be developed to ensure that there will be no occasion when the Proposed Grid Connection underground cabling route is constructed on the relevant part of Section 2 at the same time as deliveries are made to the Proposed Wind Farm site on this route. While the total construction duration for the Proposed Project is predicted to be 12 to 18 months, the traffic impact assessment presented in Section 15 of the EIAR is based on a 12 month delivery period as a conservative approach, in order to test the maximum volumes of traffic that may be generated by the Proposed Project. In the event that an additional 16 days are required for the construction of the relevant part of Section 2 outside of general construction delivery days, this will be accommodated within the additional available 6 month period (127 days) that remain in the 18 month designated construction period.



2.4.4

As per Table 15-9 (Trip generation –Stage 1- Site preparation and groundworks - total movements and volumes per delivery day - Proposed Wind Farm) of the EIAR, it is estimated that a total of 2,400 truckloads of stone will be required for the construction of the proposed windfarm. This constitutes the majority of 2-way PCUs/day (51.59 out of a total of 70.51) during this phase of the construction works. You are therefore requested to clarify whether this is in addition to the site-won material (c.70,000m3) from the proposed borrow pit, noting the estimated volume (c.70,000m3) that is to be extracted.

2441

As stated in Chapter 4, Section 4.3.1.8 of the ELAR:

"It is estimated that approx. 65,370m³ of stone material will be required to construct the Proposed Project. It is intended to obtain the majority of materials for the construction of the Proposed Project from the proposed onsite borrow pit (engineer's specified material may be imported onto the Site should sufficient volumes of suitable material not be encountered during the excavation phase of the proposed infrastructure, to come from local licenced quarries)."

While it is not anticipated that significant volumes of additional imported material will be required, in order to robustly assess the potential effects on the local traffic in the event of delivery of engineer's specified material from local licenced quarries to the Site, 2,400 truckloads of material were included for the purpose of the assessment. This is approximately 30% of the entire stone volume required to construct the Proposed Project, which represents a precautionary estimate. This material will be used for the initial surface dressing of the Proposed Wind Farm site roads and turbine hardstands and for maintenance of the same throughout the construction phase.



24.5

Further Information Item No. 5

You are required to submit a proposed boundary treatment plan/elevation for the northern site access off the L5024.

24.5.1

Response to FI Item No. 5

Please see Drawing 230502-79FI of Appendix-2, which showcases the proposed boundary treatment plan.

25

Cultural Heritage

25.1

Further Information Item No. 1

Section 14.3.4.8 of the EIAR notes that there are a 6 no. bridges (CH3-8) of local cultural heritage merit located on the proposed grid connection route and it is proposed to utilise directional drilling at all bridge crossings. Therefore, it is contended that direct effects to the structures are not anticipated. However, it is stated elsewhere in the Chapter and the accompanying drawings that Horizontal Directional Drilling (HDD) is only proposed where the grid connection will cross the River Nore and at Grange Bridge (NIAH Reg.12400902)(WC2). The underground cables are proposed to be laid in a flatbed formation for all other watercourse crossings. Furthermore, it is noted on Table 4-5 of Appendix 6-2 (Bat Survey Report) of the EIAR that HDD is proposed at WC2, WC10 and WC13. You are therefore requested to clarify these apparent discrepancies and clarify the method proposed for each river crossing.

25.1.1

Response to FI Item No. 1

To clarify, HDD was initially intended at WC01 and WC02 only (i.e. the River Nore and Grange Bridge crossings). Reference to HDD occurring at bridges CH3 to CH8 (WC4, WC7, WC9, WC11, WC12 and WC13) was included in errata. It should be noted that as part of this RFI, updated watercourse crossing drawings for watercourses WC3, WC5, WC6, WC7 (CH4) and WC11 (CH6) have been included in Appendix 2. Where bridges identified as cultural heritage features in Chapter 14 of the EIAR are not proposed to be crossed using HDD, detailed surveys of these bridges have indicated that they have sufficient road depth to accommodate underground cables without any potential for negative effects on the bridge structure. Reference to HDD occurring at WC10 and WC13 in Appendix 6-2 of the EIAR was also included in error.

Watercourses WC3, WC5, WC6 and WC7 (CH4) will now be HDD crossings to ensure there is no potential for any impact on the existing bridge structure. WC11 has also been changed from a 'Crossing Using Standard Trefoil Formation' to a 'Flatbed Formation over Bridges/Culverts' crossing type. It is confirmed that there is sufficient road depth to accommodate this without the need to raise the road level. Table 4-5 of Chapter 4 of the EIAR: has been updated, and reproduced below as Table 2, to reflect changes to the Proposed Grid Connection underground cabling route watercourse crossing types. All crossing methodologies have been correctly referenced in Table 2 below. Please also see Appendix 2 for detailed drawings of amended watercourse crossings along the Proposed Grid Connection Underground Cabling route.

Table 2: Updated Watercourse Crossing Methodologies

Crossing No.	Watercourse Type	Width of Channel (m)	Cover from Road Level to	Crossing Type Description	Extent of in-channel works
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			Top of Culvert (m)		
WC 1 (EPA Mapped WC)	River	NA	NA	Horizontal Directional Drilling	None. No in- stream works required.
WC 2 (EPA Mapped WC)	Stone Arch Bridge	15	0.45	Horizontal Directional Drilling	None. No in- stream works required.
WC 3 (EPA Mapped WC)	Stone Culvert	1	0.48	Horizontal Directional Drilling	None. No in- stream works required.
WC 4	Stone Arch Bridge	1.5	1.40	Flatbed Formation over Bridges/Culverts	None. No in- stream works required.
WC 5 (EPA Mapped WC)	Stone Arch Bridge	8	0.63	Horizontal Directional Drilling	None. No in- stream works required.
WC 6	Stone Arch Bridge	1	0.26	Horizontal Directional Drilling	None. No in- stream works required.
WC 7 (EPA Mapped WC)	Stone Arch Bridge	1.5	0.53	Horizontal Directional Drilling	None. No in- stream works required.
WC 8	Stone Culvert	0.5	0.90	Flatbed Formation over Bridges/Culverts	None. No in- stream works required.
WC 9 (EPA Mapped WC)	Stone Arch Bridge	3	0.67	Flatbed Formation over Bridges/Culverts	None. No in- stream works required.
WC 10 (EPA Mapped WC)	Concrete Pipe	0.3	0.40	Flatbed Formation over Bridges/Culverts	None. No in- stream works required.
WC 11 (EPA Mapped WC)	Stone Arch Bridge	3.5	1.43	Flatbed Formation over Bridges/Culverts	None. No in- stream works required.

WC 12 (EPA Mapped WC)	Stone Arch Bridge	2	0.66	Flatbed Formation over Bridges/Culverts	None. No in- stream works required.
WC 13 (EPA Mapped WC)	Stone Arch Bridge	3	0.63	Flatbed Formation over Bridges/Culverts	None. No in- stream works required.

252 Further Information Item No. 2

Concerns have been raised by the Planning Authority's Conservation Officer regarding the potential impact of the works on the various historic bridges along the proposed grid connection route i.e. structural damage, insufficient road depth to accommodate the new cables and the potential requirement for heightened parapets due to road buildup. You are required to respond to this issue and put forward proposals for HDD at bridges both included on the Record of Protected Structures (RPS Ref. C886)(WC6) and the National Inventory of Architectural Heritage (NIAH Ref. Reg. 12305031(C886) and 12305012 (NewBridge)(WC5)) located within the urban centre of Freshford.

2521 Response to FI Item No. 2

Additional Layout Plans for HDD at WC5 and WC6 have been included as part of this RFI. Please see drawings 230502-62FI and 230502-77FI for the updated plans. As HDD crossings will be employed at these locations, there is no potential for direct negative impacts on both protected structures as the Proposed Grid Connection underground cabling will not directly interact with the bridge structures, instead drilling beneath the road surface. Therefore the findings of the EIAR (that no significant effects on bridge structures of cultural heritage significance) has not been altered.

25 Landscape and Visual Assessment

251 Further Information Item No. 1

As per Section 13.2.1 (Scope and Definition of the Landscape and Visual Impact Assessment (LVIA) Study Area) of the EIAR (Chapter 13), a study area of 15km, referred to as the 'LCA Study Area', was deemed appropriate for effects on landscape character. Notwithstanding this, a 20km study area has been provided on all mapping within the Chapter. Please clarify whether a 20km study area has been adopted for the purposes of the LVIA.

2511 Response to FI Item No. 1

It is confirmed that a 20km Study Area has been adopted for the purposes of the LVIA. As outlined in Section 13.2.1 (Scope and Definition of the Landscape and Visual Impact Assessment (LVIA) Study Area) of Chapter 13, "Landscape and visual baseline mapping and viewpoint selection are based on a wider study area referred to as the 'LVIA Study Area', which extends to 20km for landscape and visual effects, in line with the Guidelines: "For blade tips in excess of 100m, a Zone of Theoretical Visibility radius of 20km would be adequate" (Guidelines, p.94; Draft Guidelines, p.152). The 'LCA Study Area'—a 15km radius—applies specifically to the assessment of landscape character and the evaluation of effects on County designated Landscape Character Areas.

2.7 General

2.7.1 Further Information Item No. 1

In terms of the consideration of alternatives (Chapter 3 - Consideration of Reasonable Alternatives of the EIAR), a total of four no. 110kV substations have been identified by you within 25km of the development site. It is stated that initial grid studies identified Ballyragget 110kV substation as the suitable option and a grid connection route to this substation was considered and assessed to determine its viability. You are required to provide a rationale for the identification of Ballyragget 110kV substation as the optimum connection node for the proposed development.

2.7.1.1 Response to FI Item No. 1

Please find below a breakdown in Table 3 below of the 3 no. alternative grid connection routes identified during the consideration of alternative connection nodes and rationale for the identification of Ballyragget 110kV substation as the optimum connection node.

Table 3: Alternative Grid Connection Nodes Assessment

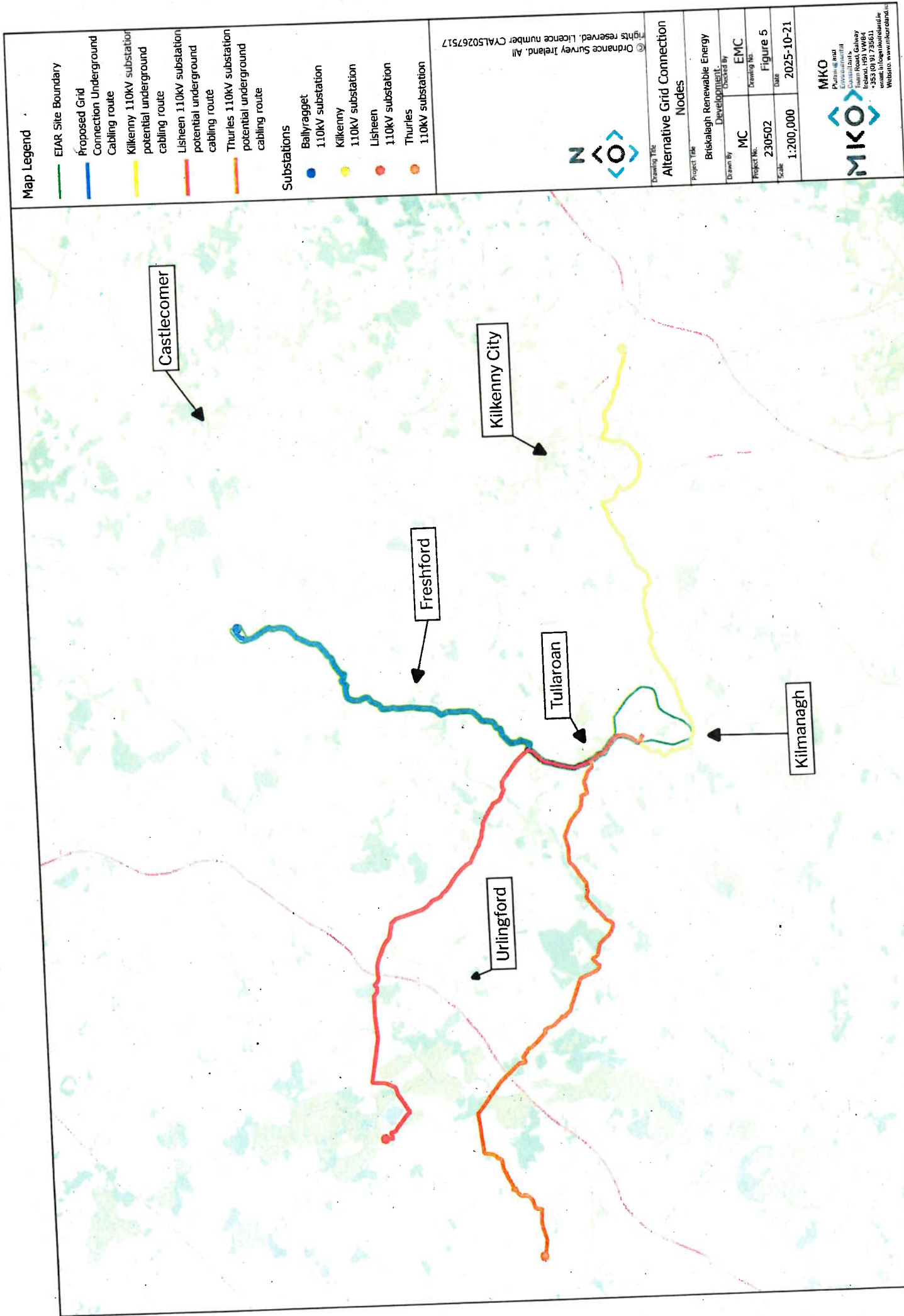
Environmental Consideration	Ballyragget 110kV substation (23.1km in length)	Kilkenny 110kV substation (24.4km in length)	Lisheen 110kV substation (28.2km in length)	Thurles 110kV substation (31.1km in length)
Population & Human Health	Potential for temporary visual impact for a shorter construction phase considering the shorter route, from presence of plant machinery onsite during the construction period. Potential for temporary noise and dust impacts for a shorter construction phase considering the shorter route, from plant machinery onsite during construction phase.	Potential for temporary visual impact for a longer construction phase considering the longer route, from presence of plant machinery onsite during the construction period. Potential for temporary noise and dust impacts for a longer construction phase considering the longer route, from plant machinery onsite during construction phase.	Potential for temporary visual impact for a longer construction phase considering the longer route, from presence of plant machinery onsite during the construction period. Potential for temporary noise and dust impacts for a longer construction phase considering the longer route, from plant machinery onsite during construction phase.	Potential for temporary visual impact for a longer construction phase considering the longer route, from presence of plant machinery onsite during the construction period. Potential for temporary noise and dust impacts for a longer construction phase considering the longer route, from plant machinery onsite during construction phase.
Land, Soils, & Geology	Lower volume of earthworks required due to shorter route. The Proposed Grid Connection underground cabling route will be primarily located within the public road carriageway.	Greater volume of earthworks required due to longer route.	Greater volume of earthworks required due to longer route.	Greater volume of earthworks required due to longer route.
Hydrology and Hydrogeology	The Proposed Grid Connection Underground Cabling route has 10 no. EPA mapped watercourse crossings. An additional 3 no. watercourse crossings were identified during surveys.	This Option has 13 no. EPA mapped watercourses. for any of these watercourse crossings.	This Option has 7 no. EPA mapped watercourses.	This Option has 11 no. EPA mapped watercourses.

Air Quality	As a result of the shorter route, this option has a lower potential for effects from dust, and vehicle emissions during construction	As a result of the longer route, this option has a greater potential for effects from dust, and vehicle emissions during construction.	As a result of the longer route, this option has a greater potential for effects from dust, and vehicle emissions during construction.
Climate	This option would result in less vehicle emissions during construction given the shorter route.	This option would result in increased vehicle emissions during construction given the longer route.	This option would result in increased vehicle emissions during construction given the longer route.
Noise & Vibration	All options would have similar noise and vibration emissions during construction. However, given the reduced length, noise and vibration emissions would be shorter in length than the other options.	All options would have similar noise and vibration emissions during construction. However, given the increased length, noise and vibration emissions would be longer in length than the Proposed Grid Connection Underground Cabling route to Ballyragget.	All options would have similar noise and vibration emissions during construction. However, given the increased length, noise and vibration emissions would be longer in length than the Proposed Grid Connection Underground Cabling route to Ballyragget.
Landscape and Visual	Neutral – there is no material difference of environmental effect between all options considered.	Neutral – there is no material difference of environmental effect between all options considered.	Neutral – there is no material difference of environmental effect between all options considered.
Cultural Heritage & Archaeology	Neutral – there is no material difference of environmental effect between all options considered. Potential to impact undiscovered	Neutral – there is no material difference of environmental effect between all options considered. Potential to impact undiscovered	Neutral – there is no material difference of environmental effect between all options considered. Potential to impact undiscovered

	subsurface archaeology across all options.	subsurface archaeology across all options.	subsurface archaeology across all options.	subsurface archaeology across all options.
Material Assets	Shortest route when compared with the 3 no. Alternative connection nodes. Shorter route would involve less road works with a greater potential for lesser impact on traffic and transport along the Proposed Grid Connection Underground cabling route. Given the shorter length of cabling required, construction duration and cost would be lesser than the 3 no. Alternative substation connection considered below.	Route is 1.4km longer than the Proposed Grid Connection route and would involve roadworks on the Kilkenny ring road (N10 & N76). Potential for greater impacts on traffic and transport given road works in close proximity to a densely populated residential node (Kilkenny city). Given the additional length of cabling, construction duration and costs would be increased.	Route is 5.2km longer than the Proposed Grid Connection route and crosses the M8 motorway. Potential for significantly increased impacts on traffic and transport due to the additional length. Given the additional length of cabling, construction duration and costs would be significantly increased	Route is 8.1km longer than the Proposed Grid Connection route and crosses the M8 motorway. Potential for significantly increased impacts on traffic and transport due to the additional length. Given the additional length of cabling, construction duration and costs would be significantly increased



When considering the 3 no. alternative substations, it was concluded that Ballyragget 110kV substation would be the optimum connection node to lower potential effects across multiple environmental considerations, such as air quality, climate and material assets, as well as reduce the construction duration and costs associated with an increased grid connection length. Figure 5 below showcases the 4 connection nodes and associated grid connection routes which were assessed.



2.7.2 Further Information Item No. 2

Noting the concerns raised by both the Planning Authority and TII regarding the absence of a plan led approach to private grid connections and its associated impacts, you shall also outline why Proposed Grid Connection Underground Cabling Route Option No.1 was discounted despite this route being adopted for the permitted Farranrory grid connection route (Kilkenny CCPI.Ref.21/627) and the absence of an acknowledgement of same within the consideration of alternatives (i.e. Chapter 2 of the EIAR). You are also required to consider further the cumulative impact of the proposed grid connection route from a traffic and transportation perspective given a number of the indicative diversion routes (Section Nos.5&6 (Table 15-29 of the EIAR)) for the proposed grid connection overlap with the permitted grid connection route (Kilkenny CCPI.Ref.21/627) serving the Farranrory Wind Farm (Tipperary CCPI.Ref.20/972).

2.7.2.1 Response to FI Item No. 2

The 'Proposed Grid Connection underground cabling route Option No. 1' -would involve the installation of an additional 6.8km of 110kV underground cabling than the Proposed Grid Connection underground cabling route (Option 3 in Chapter 3 of the EIAR), which would increase construction duration and costs, and potentially have a greater impact on traffic and transport. The longer route would also have greater impacts on air quality, climate, feature more EPA mapped watercourse crossings. This has been comprehensively addressed in Section 3.2.6.2 of the EIAR. While it is acknowledged that reference to the permitted Farranrory grid connection was absent within Chapter 3 of the EIAR, it should be noted that factors such as the increased length of Option 1 and associated disadvantages as discussed above had rendered Option 1 suboptimal prior to consideration of cumulative effects with the permitted Farranrory Grid Connection.

The construction of the permitted Farranrory grid connection is underway and is expected to be completed well in advance of the construction of the Proposed Grid Connection underground cabling route and the use of the potential diversion route sections 5 and 6, as per Figures 15-4e and 15-4f of the EIAR, which overlap with the Farranrory grid connection route. Therefore, there is no potential for cumulative effects from a traffic or transportation perspective.

2.7.3 Further Information Item No. 3

Having regard to this further information request, you are required to provide a summary of all amendments to the EIAR, NIS and other supporting information. All changes are to be clearly identified. You are also invited to submit any errata/corrections to the EIAR, NIS and any other supporting information with its response to this further information request. As above, all changes are to be clearly identified.

2.7.3.1 Response to FI Item No. 3

Where information has been altered, supported or omitted from the content submitted in the EIAR as a result of this RFI or correction of errata, this has been compiled below in subsections denoting the relevant EIAR chapters, appendices and other documents. It should be noted that the chapters listed below, nor any of their associated appendices have been altered as a result of the RFI, nor has there been any correction of errata:

- > Chapter 2: Background of the Proposed Project
- > Chapter 5: Population and Human Health
- > Chapter 10: Air Quality
- > Chapter 11: Climate

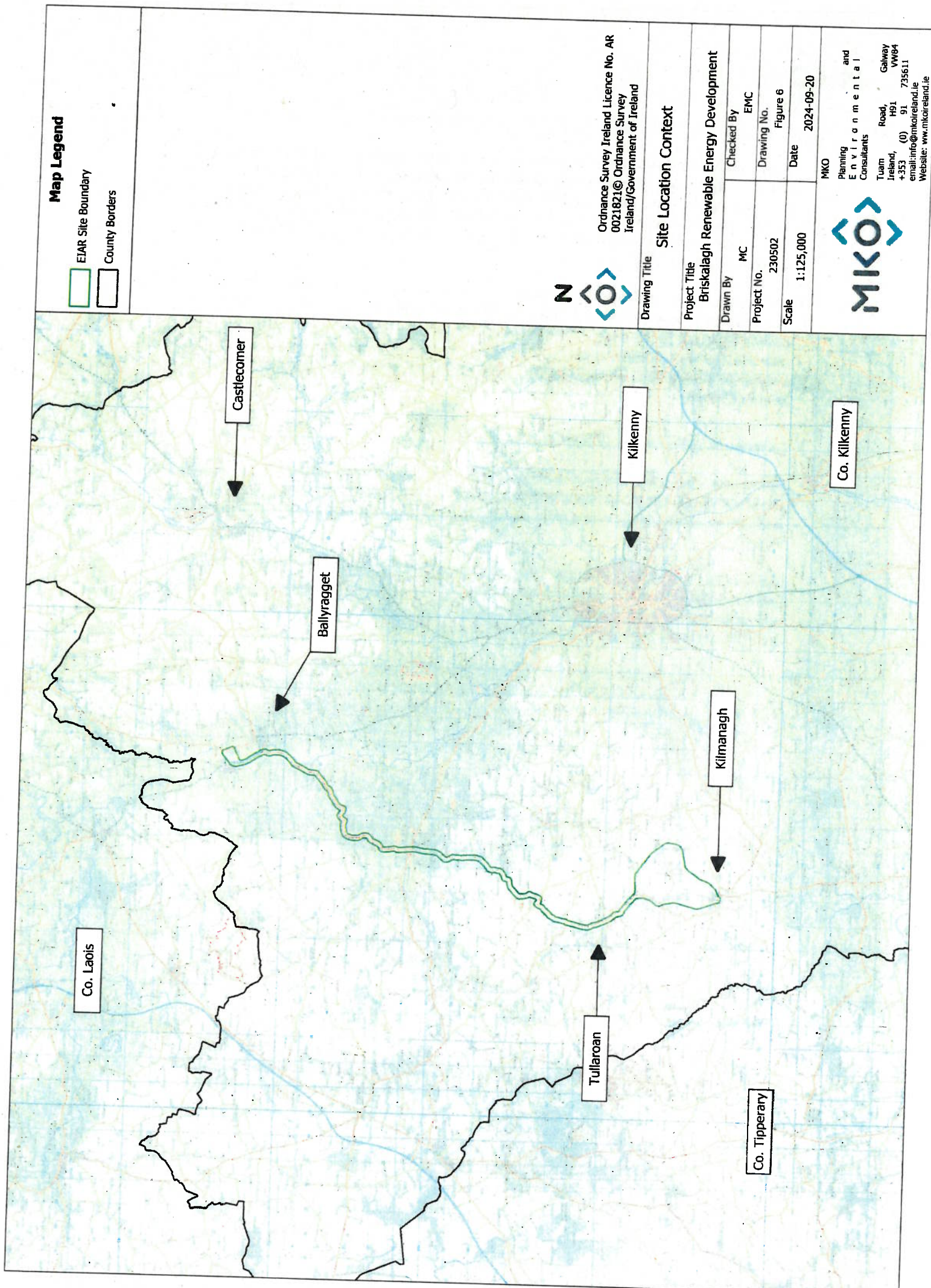


- > Chapter 13: Landscape and Visual
- > Chapter 16: Major Accidents and Natural Disasters
- > Chapter 17: Interaction of the Foregoing

2.7.3.1.1 **EIAR Chapters**

Chapter 1 - Introduction

Figure 1-1 – Site Location Context was erroneously omitted from Chapter 1 of the EIAR. This has now been included as Figure 6 below.



Map Legend

- EIAR Site Boundary
- County Borders



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Site Location Context

Drawing Title		Project Title	
Briskalagh Renewable Energy Development		Briskalagh Renewable Energy Development	
Drawn By	MC	Checked By	EMC
Project No.	230502	Drawing No.	Figure 6
Scale	1:125,000	Date	2024-09-20



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Chapter 3 – Consideration of Reasonable Alternatives

This chapter of the EIAR introduces the reasonable alternatives studied by the applicant which are relevant to the Proposed Project and its specific characteristics and an indication of the main reasons for the option chosen, taking into account the environmental effects. The consideration of alternatives typically refers to alternative design, technology, location, size and scale. A 'Do-Nothing Alternative' i.e., an outline of what is likely to happen to the environment should the Proposed Project not be implemented, has also be considered.

Additional supporting information regarding the comparison of potential environmental effects of alternative grid connection routes to Kilkenny, Thurles and Lisheen 110kV Substations when considered against the Proposed Grid Connection underground cabling route to Ballyragget 110kV substation has been provided in Section 2.7.1 and 2.7.2 of this RFI. This supporting information does not alter the finding that Ballyragget 110kV substation was the optimum connection node for the Proposed Project.

Chapter 4 – Description of the Proposed Project

This chapter of the EIAR describes the Proposed Project and all its component parts, site activities, site access and transportation, site drainage features and principles, construction methodologies and management, as well as the construction, operation and decommissioning phases of the Proposed Project.

Section 4.3.1.1.2 of Chapter 4 includes a list of site investigations carried out December 2023 and February 2024, prior to the preparation of the EIAR. As part of this RFI, additional site investigations were undertaken in August 2025 in the form of drilling 2 no. additional monitoring wells approx. 90m from T07 and at the proposed borrow pit. The list now reads as:

- A total of 22 no. trial pits, supervised by HES, at all proposed turbine locations and at other key locations (i.e. internal access roads and borrow pit location) to investigate the underlying mineral soil lithology and subsoil/bedrock interface;
- A total of 2 no. boreholes carried out by Peterson Drilling Services Ltd and supervised by HES, in order to understand the groundwater regime within the Site and the depth to bedrock;
- Logging of subsoil exposures across the site where mineral soils were exposed;
- Mineral subsoils and peat were logged according to BS: 5930.
- An additional 2 no. monitoring wells were drilled as part of a further information response to the Commission (1 no. monitoring well at the proposed borrow pit location and 1 no. monitoring well ~90m from T07)

Details of these additional site investigations are included in Appendix 8 of this response document.

Table 4-5 of Chapter 4 has been updated to reflect changes to the proposed watercourse crossing types at multiple locations (WC3, WC5, WC6, WC7, WC11) along the Proposed Grid Connection underground cabling route. An incorrect reference to Horizontal Directional Drilling occurring at WC13 has also been amended to now correctly reference *Flatbed Formation over Bridges/Culverts*. Please see Section 2.5.1.2 above for the updated table.

Multiple drawings from Appendix 4-1 of the EIAR have been amended in accordance with changes to watercourse crossing methodologies, as well as responses to further information items above, and are listed below. The updated and additional drawings are included in Appendix 2 of this RFI.

- 230502-52 (now 230502-52FI);
- 230502-60 (now 230502-60FI);
- 230502-61 (now 230502-61FI);
- 230502-62 (now 230502-62FI);

- 230502-63 (now 230502-63FI); and,
- 230502-66 (now 230502-66FI)

Chapter 6 - Biodiversity

Chapter 6 of the EIAR assesses the likely significant effects (both alone and cumulatively with other plans and projects) that the Proposed Project may have on Biodiversity. Particular attention is paid to species and habitats of ecological importance. These include species and habitats with national and international protection under the Wildlife Acts 1976-(as amended) and the EU Habitats Directive 92/43/EEC (not including avian receptors). Updates to chapter content (and associated appendices) and summaries of supporting information which have been collated in order to adequately respond to the FI items outlined in Section 2.1.1 to 2.1.11 of this RFI have been outlined below. Amendments to the NIS will not be discussed here, instead being outlined in Section 2.7.3.1.2 of this RFI (also see Appendix 3 for Revised NIS document).

Otter (Biodiversity Further Information Item No. 2)

An additional Otter (*Lutra lutra*) survey was undertaken on the 3rd of September 2025, in addition to the effort outlined in Section 6.4.3.3.2 and 6.6.4.2 of the EIAR in order to respond to Biodiversity FI Item 2 (See section 2.1.2 of the this RFI), which requests that all aspects of the Proposed Project which may result in potentially significant effects on the Otter be assessed. The updated survey carried out on 3rd September 2025 did not detect signs of otter activity, or identify any indication of otter breeding or resting at the mammal burrow (including 150m upstream and downstream) recorded on the banks of the Tullaroan stream on the 26th February 2024. No otter signs were recorded within 150m upstream and downstream of the proposed HDD location under the River Barrow and River Nore SAC during the updated survey on 3rd September 2025, but surveyors did note that the area provides suitable otter habitat and the river here is fast flowing

While existing literature acknowledges that anthropogenic disturbance affects Otter, adopting a highly precautionary approach, in the absence of appropriate design and mitigation measures, the construction phase of the Proposed Project has the potential for some localised disturbance to otter resulting from noise and increased anthropogenic activities adjacent to the Tullaroan stream within the Proposed Wind Farm site and at the River Nore crossing (WC1) along the Proposed Grid Connection underground cabling route.

From a precautionary basis, a pre-commencement otter survey will be undertaken in accordance with standard best practice guidance prior to the commencement of site works.

- Should the surveys identify the presence of an otter holt, the following measures will be undertaken. A National Parks and Wildlife Service and a derogation licence will be applied for (although compliance with such a licence has not been relied on in this assessment).
- No works will be undertaken within 150m of any holts at which breeding females or cubs are present.
- Mitigation measures relating to noise outlined in Chapter 12 of the EIAR will also reduce the potential for disturbance on Otter.

Following the implementation of mitigation measures outlined above, as well as those already outlined in Chapter 6 of the EIAR, there remains no significant residual effect on Otter as a result of the Proposed Project.

The additional Otter surveys outlined above similarly build upon Otter surveys outlined in Appendix 6-3 of the EIAR, and support the evidence that while Otters likely use the Tullaroan stream and the river Nore HDD crossing location for foraging and commuting, no small mammal burrows/Otter holts are utilised by the species within 150m of any proposed infrastructure.

Bats (Biodiversity Further Information Items No. 7, 8 and 9)

Changes have been made throughout the Bat Report (Appendix 6-2), in response to information gathered in additional surveys carried out to address Biodiversity FI Items no. 7, 8 and 9, of which the changes to the content have been coloured **green** when added and given a **red strikethrough** where removed. The Revised Bat Survey Report can be viewed in Appendix 4 of this RFI. A summary of the additional survey effort and findings has been provided below.

An additional site visit was undertaken on the 25th of August 2025 to survey features which could potentially be used by bats (e.g. structures along the Proposed Grid Connection underground cabling route, trees and linear vegetation with potential to support roosting bats which are likely to be lost as a result of the Proposed Project). This survey further builds upon the survey effort and findings outlined in Section 6.6.4.1 of Chapter 6 – *Biodiversity* of the EIAR, as well as those outlined in Section 4 of Appendix 6-2 *Bat Survey Report*, of the EIAR (See Appendix 4 of this RFI for Revised Bat Survey Report).

The methodology included more detailed inspections, supplemented by use of binoculars, a thermal camera, an endoscope, high powered torch and a ladder where necessary. Any potential features identified during the inspection were assessed at height using a torch/endoscope/thermal camera to check for roosting suitability or evidence of bat use. This enabled a comprehensive examination of potential roost features (PRFs). In total, 83 no. trees were inspected across the Site. The majority of trees comprised ash affected by ash dieback, often with areas of ivy cover. Features noted during the initial 2023 survey, such as broken branches, knot holes, and cankers, were found upon close-up inspection to be superficial, with no actual cavities or crevices capable of supporting roosting bats. Using Table 4.2 of the 2023 Collins guidance, all inspected trees were classified as None (i.e. either no PRFs or unlikely to be any) due to their size and/or lack of suitable features. No PRF-I or PRF-M trees (trees with potential roosting features capable of accommodating a small number of bats, and a larger roost respectively) were identified within the bat felling buffers, or along the proposed infrastructure footprint.

In respect of structures along the Proposed Grid Connection underground cabling route, a detailed re-inspection was undertaken in August 2025 of all structures where potential to support roosting bats was previously identified in 2024. This survey involved the use of binoculars, a thermal camera, high powered torch, a ladder, and an endoscope to facilitate a comprehensive examination of the structures including any crevices, expansion joints, and bridge arches, where accessible. Improved access to WC7 (see Table 4.5 in Bat Survey Report (Appendix 6-2) for details and location) in particular allowed for a closer inspection than was possible during the 2023 effort. During the update inspection survey of structures in August 2025, no evidence of roosting bats (droppings, staining, feeding remains, or live specimens) was identified. While no evidence of roosting was identified during either the 2023 or 2025 inspection surveys, all eight crossings were reconfirmed as having Low suitability for roosting. This is due to the presence of a small number of potentially suitable gaps/crevices for opportunistic use by individual bats. No works are proposed on the underside or abutments of the crossing infrastructure. Potential noise and vibration associated with temporary works at crossing points are not expected to be out of character with existing traffic activity or typical roadworks, to which any potential roosting bats in the area would already be accustomed. Given the short-term nature of these works, significant disturbance or displacement of bats is not anticipated. For the reasons outlined above, the findings of the EIAR in relation to bats have not been altered.

Amphibians and Reptiles (Biodiversity Further Information Item No.10)

In addition to text included in Section 6.6.5 of the EIAR, it is noted that given the widespread presence of suitable habitats on site to support these species, and in consideration of their respective conservation status and protection afforded to them, it has been assumed, for the purpose of this assessment, that commonly encountered amphibian and reptile species occur within the Proposed Wind Farm site and along the Proposed Grid Connection underground cabling route. However, this assumption does not alter the conclusion in the EIAR that the Proposed Project will not result in significant loss to habitat for amphibians and reptiles. This has been discussed in Section 2.1.10 of this RFI document.

Linear Habitat Removal (Biodiversity Further Information Item No. 7)

The linear vegetation removal figure of 1,388m presented throughout Chapter 6 of the EIAR, Section 5.2 and 6.1.5 of Appendix 6-2 Bat Report (Revised Bat Survey Report available as Appendix 4 of this RFI), as well as Section 1.1 and 2 of Appendix 6-4 *Biodiversity Management and Enhancement Plan*, has been updated with an overall loss of 1,508m of linear vegetation (not inclusive of the additional 27m of temporary linear vegetation removal at the southern site entrance), leading to a loss of an additional 120m of linear habitat (not including an additional 27m of linear habitat to be temporarily removed at the southern site entrance off the L1009), as a result of recalculations requested by the Commission, discussed in Section 2.1.7 of this RFI. This additional loss does not alter the conclusions of the EIAR, as the planting of additional hedgerows (270m), a narrow band of riparian woodland (approx. 918m in length) and enhancement of existing hedgerows (3,640m), ensure no significant effects on linear habitat will occur as a result of the Proposed Project.

Chapter 7 - Birds

Updated supporting information in relation to the predicted noise and vibration impact of the HDD crossing at the River Nore Crossing (WC1) on the Kingfisher (*Alcedo atthis*), including baseline noise levels, as well as an updated Impact Assessment and mitigation measures in relation to the Kingfisher at this location is provided in Section 2.1.3 of this RFI at the request of the Commission (See Section 2.1.3 of this RFI). The additional information does not alter the conclusions of the EIAR that no significant effects on Kingfisher will occur as a result of the Proposed Project once mitigation measures are employed. Additional mitigation measures to protect potential commuting and foraging Kingfisher at the River Nore crossing are proposed below:

- To avoid potential adverse effects, it is proposed to seasonally constrain the HDD works at the River Nore crossing, which would thereby (effectively) eliminate any possibility of an adverse effect for kingfisher during the breeding season. Following this approach, it is proposed to undertake the proposed HDD underground crossing of the River Nore SPA outside the bird nesting season, i.e. outside March and July inclusive
- A pre-commencement kingfisher survey will be undertaken prior to any HDD works to confirm the absence of kingfisher nest sites within 100m (i.e. the upper end of the predicted zone of influence for noise and vibration effects) of the proposed crossing point. If breeding sites are identified and occupancy confirmed, all construction works within 100m will be suspended until the nest is no longer occupied

Chapter 8 - Land, Soils and Geology

Chapter 8 - *Land, Soils and Geology* provides a baseline assessment of the environmental setting of the Proposed Project, in terms of Land, Soils and Geology and discusses the potential likely significant effects that the construction, operation and decommissioning of the Proposed Project will have on the receiving environment.

Additional supporting information has been provided in relation to site investigation at T07 in response to Hydrology and Hydrogeology FI Item No. 3, and can be viewed in Appendix 8 of this further information document. The findings of the site investigation do not alter the findings of the impact assessment presented in chapter 8 of the EIAR. Section 8.6.2.8 of the EIAR states that "*piling foundations may be required at T7*". Results of the additional site investigation corroborate and effectively confirm this assertion, with piled foundations most likely being required at T07, subject to pre-commencement geotechnical surveys.

Chapter 9 - Hydrology and Hydrogeology

Chapter 9 *Hydrology and Hydrogeology* of the EIAR provides a baseline assessment of the environmental setting of the Site, in terms of hydrology and hydrogeology, and discusses the potential

likely significant effects that the construction, operation and decommissioning of the Proposed Project will have

Additional site investigations have been conducted which add to those outlined in Section 9.2.2 of the EIAR in response to Hydrology and Hydrogeology FI Item No. 2 and No. 3. This included the installation of a monitoring well within 90m of T07 as well as a monitoring well at the proposed borrow pit location. The hydrogeological regime at the proposed borrow pit location is currently characterized by high rates of surface water runoff and low rates of groundwater recharge, and a low bedrock permeability of 3.97×10^{-7} m/s was measured. The findings of the site investigation do not suggest that any significant effects are likely to occur at the proposed borrow pit location due to the topographic setting and the local hydrogeological regime, that there will be no significant inflows of groundwater that will require dewatering in most excavations. Therefore the results of the additional site investigation do not alter the conclusions outlined in Section 9.5.2.5 of the EIAR.

Regarding site investigations within 90m of T07, a slow water strike was encountered in the clay deposits at a depth of 5.5mbgl with a more significant strike at 11.5mbgl. A permeability test determined that the permeability value was relatively high at 1.79×10^{-4} m/s. However, the results of the site investigation do not alter the conclusions presented in the EIAR, which assessed both gravity and piled foundations, of which a piled foundation will most likely be implemented at T07. This is subject to ground conditions encountered at the turbine location given a consent is granted. The conclusion that potential piling works will not result in any significant effects remain unchanged.

A site specific hydraulic flood model has been completed in response to the FIR outlined in Section 2.3.5 above (See Appendix 9 for detailed report). To summarise, the hydraulic flood model includes for models of watercourse crossings and channel alterations within the site. The hydraulic model results suggest that there is no significant change in the flow rate downstream of the Proposed Wind Farm site and this confirms that downstream flooding will not be impacted. Total catchment area upstream of Kilmanagh is c. 40km², and the Proposed Wind Farm footprint is ~0.087km², ~0.22%, so the ability of the proposed development to effect downstream flows is very small. Therefore the site specific flood model corroborates the conclusions of the semi quantitative and qualitative flood risk assessments included in Appendix 9-1 and Table 9-20 of the EIAR.

Reference to 4 no. HDD watercourse crossings included in Section 9.5.2.13 of the EIAR has been superseded by those outlined in Table 2 of Section 2.5.1.1 above. 6 no. HDD watercourse crossings will no be employed along the Proposed Grid connection Underground cabling route.

Appendix 9-3 – Water Framework Directive Assessment

Section 2.2.2 and Section 3.3 of Appendix 9-3 of the EIAR *Water Framework Directive Assessment* states that there is 1 no. proposed crossing over the River Nore. To clarify, this crossing will be a HDD crossing underneath the River Nore, with no in stream works proposed. This clerical error does not alter the findings of the WFD Assessment.

Reference to 4 no. HDD crossings occurring along the Proposed Grid Connection underground cabling route in Section 4.3.1.7 of Appendix 9-3 had been included in errata and that WC13 was never intended to be crossed with HDD. To clarify, 6 no. HDD crossings will now be employed along the Proposed Grid Connection underground cabling route, as outlined in Section 2.5.1 above.

Chapter 12 – Noise and Vibrations

This chapter of the EIAR describes the assessment undertaken of the potential noise and vibration impacts associated with the Proposed Project and its component parts (Proposed Wind Farm and Proposed Grid Connection underground cabling route). Both of which are discussed below.

Proposed Grid Connection

Information in relation to noise levels at the HDD crossing at the River Nore (WC1) has been provided in Appendix 5 of this RFI in response to Biodiversity FI Item No. 3. There are no NSL's within 200m of the drilling pits at this location so no significant impacts are predicted as a result of these works. Impact of HDD works as a result of the predicted noise and vibration of HDD works at the River Nore have been discussed in 'Chapter 7 - Birds' above and Section 2.1.3 of this RFI.

Proposed Wind Farm

Additional predicted omni-directional and cumulative omni-directional noise data has been provided in Appendix 6 and 7 of this RFI respectively. Additional cumulative projects have been considered as outlined in Section 2.2.1.1 above and listed below. These additional projects do not alter the assessment provided in Section 12.7.4.2.2 and it is confirmed that the appointed contractor will coordinate with the contractors for other projects to ensure that works do not coincide so as to cause cumulative significant noise or vibration effects at NSL's along the Proposed Grid Connection underground cabling route.

- KCC 21627 Grid Connection to Farranrory Wind Farm, amended by KCC 2360248;
- KCC 2360330 Grid Connection to a Solar Farm at Ballyconra;
- KCC 2560418 Grid Connection to Seskin Wind Farm, and
- KCC 2460241 Battery Energy Storage System (BESS) at Moatpark, Ballyragget

The addition of the supporting information outlined above do not alter the conclusions of Chapter 12 of the EIAR that there will not be any significant effects associated with noise and vibration as a result of the Proposed Project.

Appendix 12-8 of the EIAR has been superseded by Figure 3 in Section 2.2.4 above.

Chapter 14 - Cultural Heritage

Reference to watercourse crossing types have been superseded by those outlined in Section 2.5.1.2 above. The clapper bridge (WC6)(RPS Ref. C886/ NIAH Reg. 12305031) and New Bridge (WC5)(Reg. 12305012) in Freshford will now be crossed using HDD, superseding reference to flatbed formation in Section 14.3.4.6, 14.4.3.6 and 14.4.3.7 of the EIAR. Reference to HDD occurring at CH 3 to 8 (WC4, WC7, WC9, WC11, WC12, WC13) had initially been included in error. The Applicant wishes to clarify that of these bridge of local cultural heritage merit, HDD crossing will now only occur at CH4 (WC7). The other 5 no. bridges of local cultural heritage merit can be suitably crossed using flatbed formation crossings. Inspection of these bridges has confirmed that they can suitably accommodate the grid connection cabling without compromising the integrity of the structure, and that no works or alterations to the bridge structure (inclusive of parapet heightening) are necessary to facilitate crossing these structures. Changes to bridge crossing methodology, as well as reference to HDD which had initially been included in error do not alter the conclusion that there will not be any significant effects at any historic bridges along the Proposed Grid Connection underground cabling route

Chapter 15 - Material Assets

All FI Items relating to Traffic and Transport have been comprehensively addressed in Section 2.4 above. While clarifications on the local roads ability to accommodate the additional traffic generated by the Proposed Project, as well as the adequacy of the diversion routes, no additional, nor amended information has been provided outside what was initially included in Chapter 15 *Material Assets* of the EIAR and as such, the conclusions of this Chapter have not been altered.

Chapter 18 – Schedule of Mitigation and Monitoring Measures

Whilst no alteration have been made to mitigation measures outlined in Chapter 18, additional mitigation measures proposed throughout this RFI have been listed below

Table 4: Additional Mitigation and Monitoring measures Proposed in RFI

Ref. MM no.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
Response to Further Information Document					
MM118	Environmental Management	RFI Section 2.1.4 RFI Appendix 3, Section 6.2.3	➤ To avoid potential adverse effects, it is proposed to seasonally constrain the HDD works at the River Nore crossing, which would thereby (effectively) eliminate any possibility of an adverse effect for kingfisher during the breeding season. Following this approach, it is proposed to undertake the proposed HDD underground crossing of the River Nore SPA outside the bird nesting season, i.e. outside March and July inclusive		
MM119	Environmental Management	RFI Section 2.1.4 RFI Appendix 3, Section 6.2.3	➤ A pre-commencement kingfisher survey will be undertaken prior to any HDD works to confirm the absence of kingfisher nest sites within 100m (i.e. the upper end of the predicted zone of influence for noise and vibration effects) of the proposed crossing point. If breeding sites are identified and occupancy confirmed, all construction works within 100m will be suspended until the nest is no longer occupied.		
MM120	Communications	RFI Section 2.2.1	➤ At construction stage, the appointed contractor will coordinate with the contractors for other projects to ensure that works do not coincide so as to cause cumulative significant noise or vibration effects at noise-sensitive locations along the proposed grid connection		
MM121	Otter	RFI Appendix	➤ From a precautionary basis, a pre-commencement otter survey will be undertaken in accordance		

Ref. MM no.	Reference Heading	Reference Location	Mitigation Measure	Audit Result	Action Required
		3, Section 6.2.2	with standard best practice guidance prior to the commencement of site works. Should the surveys identify the presence of an otter holt, the following measures will be undertaken. ➤ A National Parks and Wildlife Service and a derogation licence will be applied for (although compliance with such a licence has not been relied on in this assessment). ➤ No works will be undertaken within 150m of any holts at which breeding females or cubs are present. ➤ No wheeled or tracked vehicles (of any kind) will be used within 20m of active, but non-breeding, otter holts. Light work, such as digging by hand or scrub clearance will also not take place within 15m of such holts, except under licence (NRA, 2008).		

2.7.3.1.2 Natura Impact Statement and First Party Grounds of Appeal Document

In response to Biodiversity FI Items No. 1 and 2, a Revised Appropriate Assessment Screening Report and Natura Impact Statement (NIS) has been prepared and included in Appendix 3 of this RFI. Updated and/or additional text has been coloured green. Where text has been removed, this is identified by ~~red, strikethrough text~~.

It should firstly be highlighted that Figure 3-1 of the Appeal Document contained incorrect site boundaries and legend references. The correct figure has been included below (See Figure 7). A summary on updated surveys and findings has been provided below, but has also been discussed in Section 2.7.3.1.1.

Detail on additional Otter surveys has been provided in Section 3.3.1.1 and 3.3.1.2 of the Revised NIS (Appendix 3 of this RFI). Results of the Otter survey (Section 3.5.3.5 of the Revised NIS) found that Otter spraint and slides were also recorded approximately 150m downstream of WF4 along the Tullaroan Stream. A mammal burrow which had potential to be used as a holt was recorded along the banks of the Tullaroan Stream within the Proposed Wind Farm site in February 2024, however a

camera trap was deployed for 3 weeks on the 12th of March 2024 confirming the burrow is not an active holt. An updated survey was carried out on the 3rd of September 2025 which again did not detect signs of otter activity. Another mammal burrow with the potential to be used as a holt was recorded approximately 155m downstream of WF4 in 2024, again along the banks of the Tullaroan Stream within the Proposed Wind Farm site. A camera trap was deployed on the 12th of March 2024 and footage revealed mink and pine marten activity in the vicinity of the burrow and riverbank on multiple occasions, but no fauna was recorded emerging or entering the burrow itself. Audio recorded by the camera trap on one occasion, can likely be attributed to otter, based on a comparison of published audio recordings of this species, revealing that otter are likely using the Tullaroan Stream in the vicinity of the Site to some degree, as would be expected. No evidence of otter using this burrow nor indication of otter breeding was recorded during this time and it is therefore considered to not be an otter holt. No otter signs were recorded within 150m upstream and downstream of the proposed HDD location during the updated survey on 3rd September 2025, but surveyors did note that the area provides suitable otter habitat and the river here is fast flowing.

Section 4 of the Revised NIS screens in the River Barrow and River Nore SAC, as well as the River Nore SPA for further assessment, of which, both are discussed below in the context of new and previous information gained during Otter and Kingfisher surveys.

Section 6.2.2 of the Revised NIS thoroughly discussed literature on disturbance to otters and the potential for impacts to Otter as a result of the Proposed Project. Adopting a highly precautionary approach, in the absence of appropriate design and mitigation measures, the construction phase of the Proposed Project has the potential for some localised disturbance to otter resulting from noise and increased anthropogenic activities adjacent to the Tullaroan stream within the Proposed Wind Farm site and at the River Nore along the Proposed Grid Connection underground cabling route. Mitigation measures to reduce any potential disturbance are outlined below:

- From a precautionary basis, a pre-commencement otter survey will be undertaken in accordance with standard best practice guidance prior to the commencement of site works.
- Should the surveys identify the presence of an otter holt, the following measures will be undertaken. A National Parks and Wildlife Service and a derogation licence will be applied for (although compliance with such a licence has not been relied on in this assessment).
- No works will be undertaken within 150m of any holts at which breeding females or cubs are present.
- No wheeled or tracked vehicles (of any kind) will be used within 20m of active, but non-breeding, otter holts. Light work, such as digging by hand or scrub clearance will also not take place within 15m of such holts, except under licence (NRA, 2008).

However, given the published literature discussed in Section 6.2.2 of the Revised NIS, noting the lack of significant effect on otter as a result of disturbance caused by anthropogenic sources (of which Otter that commute or forage in proximity of the Site and River Nore HDD crossing are likely well accustomed to), and the precautionary provision of mitigation measures irrespective of the findings of available literature, it can be objectively concluded that the construction of the Proposed Project (including HDD beneath the River Nore) will not result in any adverse impact to populations of otter associated with the River Barrow and River Nore SAC, to the extent that it would undermine the conservation objectives of this QI species.

Additional Kingfisher surveys are discussed in Section 3.5.4 of the Revised NIS document. During the breeding kingfisher survey carried out at the Nore HDD crossing point (WC1) in May 2025, no nesting burrows were recorded within the survey area. The majority of bank habitat within the survey area was assessed as unsuitable nesting habitat for kingfisher, with a minor section (c.10m) of sub-optimal nesting habitat being identified on the western bank of the river, c.45m from the HDD crossing point. A section of suitable nesting habitat was recorded approximately 85m upstream of the proposed crossing location. No burrows were recorded at either of these locations. In addition, no evidence of kingfisher was

recorded during surveys of the banks of the River Nore approximately 150m upstream and downstream of the proposed HDD crossing location on the 3rd September 2025. However, the watercourse was deemed to offer suitable commuting and foraging habitat for kingfisher owing to the presence of occasional overhanging branches which could be used for perching.

The Noise and Vibration survey carried out by AWN Consulting Ltd is briefly discussed in Section 3.5.5 of the Revised NIS (Please see Appendix 5 of this RFI for details on this assessment). In summary, the baseline noise levels are similar to the predicted cumulative construction noise levels at the riverbanks of the Nore. It is therefore contended that the noise levels as a result of HDD at the River Nore are unlikely to give rise to significant effects on foraging kingfisher, however, there is a possibility of disturbance from vibration on the high end of the predicted range (5mm/s).

While it cannot be ruled out that kingfisher forage within the zone of potential disturbance (i.e. within 50-100m of the HDD location), the likelihood is that they do not. The rationale for this is that there is an uneven distribution of the species in the River Nore. As outlined in the River Nore SPA site conservation objectives, in 2010, densities of 0.10-0.14 territories/km length of channel were recorded for this site (Cummins et al., 2010). Despite the low rate of occurrence in a given 1km length of channel, following the precautionary principle, foraging cannot be ruled out locally.

Without intervention, following the precautionary principle, adverse effects cannot therefore be ruled out for the foraging kingfisher of the SPA at the HDD crossing point.

To avoid potential adverse effects with regard to potential disturbance effects on this SCI species, the following mitigation measure is prescribed:

- The HDD works proposed beneath the River Nore will be undertaken outside the bird nesting season (i.e. outside March and July inclusive). This measure will effectively eliminate any possibility of an adverse effect for kingfisher during the breeding season.

Notwithstanding the above, the following additional mitigation measure is prescribed:

- A pre-commencement kingfisher survey will be undertaken prior to any HDD works to confirm the absence of kingfisher nest sites within 100m (i.e. the upper end of the predicted zone of influence for noise and vibration effects) of the proposed crossing point. If breeding sites are identified and occupancy confirmed, all construction works within 100m will be suspended until the nest is no longer occupied.

It can therefore be objectively concluded that the Proposed Project, individually or in-combination with other plans or projects, will not adversely affect the integrity of any European Site.

Map Legend

- ETAR Site Boundary
- Special Area of Conservation (SAC)
- Special Protection Area (SPA)

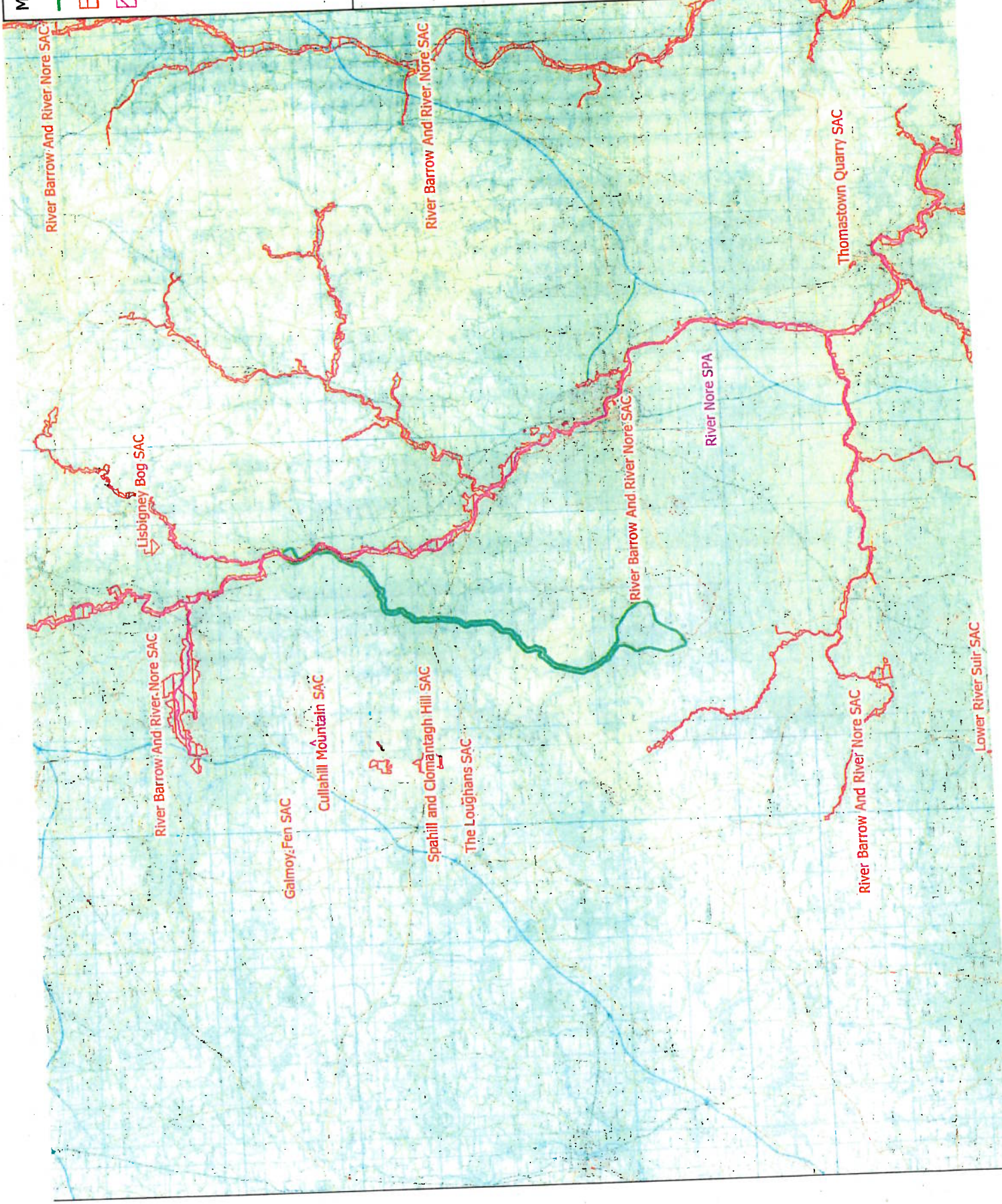


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Drawing Title
Enerco Briskalagh Wind Farm
European Designated Sites in relation to the Proposed Project

Project Title	Checked By	CM
Drawn By	FK	CM
Project No	230502	Figure 7
Scale	1:246,100	Date
		08.10.2024

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274 Further Information Item No. 4

You are required to provide a response to any issues raised in the third-party observations to the appeal, all of which are enclosed with this letter.

2741 Response to FI Item No. 4

Responses to third party submissions have been provided below, addressing only the new submission items that were not previously responded to in the First-Party Grounds of Appeal Document (the Appeal Document) submitted to the Commission.

A total of 60 third-party submissions were submitted to the Commission in relation to the First Party Appeal of the Proposed Project. Table 5 below outlines the common themes identified within the Third-Party submissions and specifies who in the project team is responsible for the corresponding response. Table 6 details the third-party observers, the themes raised within submissions, and where they have been addressed within this RFI, or if it has been comprehensively addressed in the Appeal Document previously. It is noted that 55 of the 60 no. submissions from Observers are identical. These have been addressed in Table 6 under the Observer 'Community Submission Template', rather than including a row for each Observer individually.

Table 5:5 Items raised in Third-Party Submissions

Theme	Lead Author for Response
Landscape and Visual	MKO
Impact on Water and Flood Risk	MKO/HES
Human Health and Property Prices	MKO
Cumulative Effects	MKO
Biodiversity	MKO
Community and Community Engagement	MKO
Built Heritage and Archaeology	MKO
Turbine Spacing and Site Design	MKO
Policy and Legislation	MKO

Table 6 Submissions on the Proposed Project - First Party Appeal

Third-Party Observers		
Community Submission Template	Planning Policy and Legislation	> Section 2.7.4.1.9 > Appeal Document
	Human Health and Property Values	> Appeal Document > Section 2.7.4.1.3
	Biodiversity	> Appeal Document > Section 2.7.4.1.5
	Cumulative Effects	> Appeal Document
	Landscape and Visual	> Appeal Document
	Site Design	> Appeal Document > Section 2.7.4.1.8
	Company Structure	> Appeal Document
	Heritage	> Appeal Document > Section 2.7.4.1.7
	Community Engagement	> Appeal Document
	Water and Flood Risk	> Appeal Document > Appendix 8 of the RFI
Graigie Ballycallan GAA Club and St. Brigid's Camogie Club	Flooding Concerns	> Appeal Document > Appendix 8 of the RFI > Appendix 9 of the RFI
	Noise and Visual Impact	> Appeal Document > Section 2.7.4.1.1
	Human Health	> Appeal Document
	Youth Emigration / Rural Decline	> Appeal Document > Section 2.7.4.1.6

	Increased Traffic	> Appeal Document
KBT Responsible Energy	Planning Policy, Legislation and Planning Application	> Appeal Document > Section 2.7.4.1.9
	Human Health, Property Prices and Noise	> Appeal Document > Section 2.7.4.1.3
	Biodiversity	> Appeal Document > Section 2.7.4.1.5
	Cumulative Effects	> Appeal Document
	Landscape and Visual Impact	> Appeal Document > Section 2.7.4.1.1
	Site Design	> Appeal Document > Section 2.7.4.1.8
	Company Structure	> Appeal Document
	Cultural Heritage and Archaeology	> Appeal Document > Section 2.7.4.1.7
	Haul Route and Grid Route	> Appeal Document > Section 2.4 > Section 2.7.1 > Section 2.7.2
	Community Engagement	> Appeal Document
Kilkenny West Group Water Scheme Cooperative society ltd.	Groundwater Vulnerability and Sensitivity of Aquifer	> Appeal Document > Appendix 8 of the RFI > Appendix 9 of the RFI
	Testing at T07	> Appendix 8 of the RFI
	Surface and Groundwater Interaction with the Tullaroan Stream	> Appeal Document > Appendix 8 of the RFI
	Borrow Pits	> Appeal Document > Appendix 8 of the RFI



	Limitations of Mitigation Measures	> Appeal Document > Appendix 8 of the RFI
Sharon Trayer	Site Location	> Appeal Document
	Deficiencies in the EIAR	> Appeal Document > Appendix 3 of the RFI > Appendix 8 of the RFI > Appendix 9 of the RFI
	Natura Impact Statement	> Appeal Document > Section 2.1.2 > Appendix 3 of the RFI
	Planning Policy and Legislation	> Appeal Document > Section 2.7.4.1.9
	Community and Community Engagement	> Appeal Document
	Human Health and Property Value	> Appeal Document > Section 2.7.4.1.3
	Cumulative Impact	> Appeal Document

2.7.4.1.1 Landscape and Visual

A number of submissions make reference to the adequacy of the viewpoints selected in the application, vegetation screening and impact on the amenity value at the Tom Ryall Park. All viewpoints selected are consistent with best practice guidance, ensuring a balanced and representative assessment of the visibility and impact of the Proposed Project on residential visual amenity. All other observations/submissions relating to landscape which have been made to the Commission have been comprehensively addressed in Section 4.1.1 of the First Party Grounds of Appeal document.

2.7.4.1.2 Impact on Water and Flood Risk

A number of third-party observations make reference to the impact of the Proposed Project on the underlying aquifer, mitigation measures proposed, flood risk in Kilmanagh and surrounding environs and the drinking water supply. It is considered that Chapter 9 and associated appendices of the EIAR, as well as Section 4.1.2 of the First Party Grounds of Appeal document and Section 2.3 of this RFI have comprehensively addressed the observations raised.

Appendix 8 of this RFI contains responses to water related submissions prepared by HES.

2.7.4.1.3 Human Health and Property Prices

Third party observations raise concern over the Proposed Projects potential to impact human health and property prices in Kilmanagh and the surrounding environs. While human health and property prices have been discussed comprehensively throughout Chapter 5, 10 and 12 of the EIAR and Appeal Document, concern has also been raised in relation to the impact of the Proposed Project on property prices, particularly within 2km of Proposed Turbines.

While the impact of the Proposed Project on property prices has been comprehensively dealt with in Section 5.7 of Chapter 5 'Population and Human Health' of the EIAR, as well as Section 4.1.10 of the First Party Grounds of Appeal document, many submissions claim that the Applicant has dismissed the CERIS (2023) report regarding the impact of wind farms on property prices in Ireland. This is not the case as Section 5.7.1 of Chapter 5 refers to this study and its findings directly. It should be iterated that whilst potential devaluation of -14.7% was found to occur within properties within 1km of wind turbines, the author states that there are *"no significant reductions in house prices beyond 1km"*, that *"there is evidence to suggest that the price effect is not persistent"* and *"analysis shows that effects attenuate over time, becoming insignificant beyond 10 years post-connection"*.

2.7.4.1.4 Cumulative Effects

Observations claim that the cumulative effect of the Proposed Project when considered alongside existing and permitted windfarms in the area remains unaddressed. It must be clarified that all EIAR chapters have assessed the cumulative effects that have the potential to arise from all wind farms within the cumulative study areas. These include cumulative noise and vibration impacts, residential amenity, cumulative visual impacts, cumulative impacts on biodiversity (including birds), impacts on hydrology and geology, et cetera. The Proposed Project design and mitigation measures proposed will ensure that significant cumulative effects do not arise during the construction, operational or decommissioning phases of the Proposed Project. The cumulative impact of the Proposed Project with other developments has also been discussed in Section 4.1.5 of the First Party Grounds of Appeal Document.

2.7.4.1.5 Biodiversity

Some observations claim that the EIAR and NIS are non-compliant with EU law (Habitats Directive) and there *"continues to be critical data gaps and errors along with new errors"* in these reports. MKO is confident that the Revised NIS and provision of information to satisfy the FIR has amended any such errors and there are no critical data gaps, with updated surveys at targeted locations also informing the

Revised NIS (Please refer to the Responses provided to Further Information Items No. 1 and No. 2 for further details). In addition, mitigation relating to pre-construction other surveys, in line with best practice guidance, prescribed in the Biodiversity Chapter (see Section 6.7.2.2.2), has been replicated in Section 6.2.2 of the NIS to ensure consistency. The Biodiversity Chapter has been prepared in accordance with relevant legislation and best-practice guidance (see Section 6.3 of the Biodiversity Chapter). Sufficient ecological data, from a combination of available desktop information and the results of surveys undertaken, has been used to assess the Proposed Project's potential to result in likely significant effects to protected habitats and species, designated sites (including Natura 2000 sites) and habitats and species of local biodiversity importance.

One submission states that there is a lack of information regarding the presence of invasive species listed on the Third Schedule of the Birds and Natural Habitats Regulations, 2011. MKO refute this position. No evidence of any such invasive species was recorded within the footprint of the Proposed Wind Farm or Proposed Grid Connection during multiple surveys conducted. Japanese knotweed (*Reynoutria japonica*) was recorded along the proposed turbine delivery route in one location, but the delivery of turbine components will not interact with this stand, meaning that there is no risk of exacerbating the spread of this species as a result of the Proposed Project.

The same submission states that no observations of mosses/liverworts/lichens are made in the reports. This is factually incorrect with bryophyte species, where relevant to the habitat classification or vegetative composition (for example in woodlands), being described in the habitat descriptions in Section 6.6.1 of the Biodiversity Chapter. In addition, the submission claims that the ecological value/condition of various areas of hedgerows/treelines that will be removed/felled is missing from the biodiversity assessments. This is in fact incorrect with all hedgerows and treelines being assigned an ecological valuation of Local Importance (Higher Value), owing to the ecological connectivity they provide across the wider landscape and foraging and nesting resources they provide to mobile fauna species (see Table 6.10 in Section 6.6.7 in the Biodiversity Chapter).

The same submission notes that no surveys for amphibians or reptiles were undertaken to inform the assessment. It is misleading to claim that no surveys for amphibians or reptiles were undertaken when in fact the multidisciplinary surveys carried out were designed to detect the presence, or likely presence, of a range of protected species or suitable supporting habitat for such species, including amphibians and reptiles (see Section 6.4.3.1 of the Biodiversity Chapter). No direct observations of amphibian or reptile species were made during the range of surveys undertaken. Potential supporting habitat was recorded in the form of watercourses and drainage ditches (see Section 6.6.5 of the Biodiversity Chapter). No significant loss of supporting habitat is anticipated as a result of the construction or operation of the Proposed Project. It should be noted that mitigation to prevent impacts to surface water quality deterioration is included in Section 6.7.2.1.1 of the Biodiversity Chapter. As a result, amphibians and reptiles have not been considered as KER's in this project (see Section 2.1.10 of this RFI for rationale). The same submission highlights that the Biodiversity Chapter of the EIAR does not mention any tree felling along the grid/haul route and substation, despite locals being told otherwise. MKO confirm that there is no tree felling proposed as part of the Proposed Grid Connection underground cabling route. Felling at the proposed on-site substation has been re-assessed and discussed in Section 2.1.7 of this RFI. In addition, there will be no loss of road fringe habitats (such as treelines or hedgerows) required to facilitate the delivery of the turbine components. Minor works and vegetative pruning may be necessary, but no felling is proposed. As detailed in Section 6.7.2.1.2 of the Biodiversity Chapter, linear habitat (comprising mainly hedgerow with a lesser amount of treeline habitat) will be removed within the boundary of the Proposed Wind Farm site to facilitate the construction of the Proposed Wind Farm footprint, including required bat buffers.

The same submission also states that the badger survey used to inform the assessment was not carried out within the optimal season and cannot therefore be taken as a reliable representation of badger usage within the site. To note, the NRA (2009) guidance states that "surveys to identify setts and field signs can be undertaken at any time of the year but are most effective between November and April when vegetation cover is reduced". While some of the multidisciplinary surveys were conducted outside the optimal survey window, others fell within that window. What's more, the camera trap

surveys, used to determine whether burrows identified as having potential to be used by badger where in active use by the species, were carried out in March and April 2024. MKO are satisfied that the results of badger surveys undertaken do provide an accurate reflection of badger usage within the site from that point in time. Acknowledging that badger is a mobile species, a pre-construction survey is proposed to be undertaken in advance of works commencing, in line with best practice. MKO are confident that a robust assessment with respect to potential effects of the Proposed Project in relation to badger has been completed.

This submission also claims that “no assessment of impacts on water quality and effects on SAC and annexed species” from construction works has been undertaken. MKO strongly disagree with this position. A comprehensive assessment of the Proposed Projects capacity to result in significant effects on the receiving hydrological environment is presented in the Section 6.2.1 of the Revised NIS (included as Appendix 3 to the RFI). This assessment includes indirect effects on protected species (such as those listed on Annex II of the Habitats Directive) and overall effects to the River Barrow and River Nore SAC.

2.7.4.16 Community and Community Engagement

Some observations make reference to the impact of the Proposed Project on the community, highlighting the potential for young people to leave the locality and claims there was a lack of meaningful community engagement.

Chapter 2 and Appendix 2-1 of the EIAR, as well as Section 4.1.11 of the First party Grounds of Appeal document provide comprehensive detail on the extensive community consultation that occurred and on the substantial community benefit fund associated with the proposal and will not be discussed further in this RFI document.

Regarding claims that young people will leave the locality, there is no evidence to suggest that young people, or local residents in general are more inclined to emigrate from an area with wind energy developments present or proposed. On the contrary to claims about emigration of youth as a result of wind energy developments, findings from an Irish based study on attitude towards wind energy developments found that a majority of residents with ‘strong willingness to accept’ and ‘moderate willingness to accept’ wind energy development are 35 years old or younger, making up 49% and 55% of each latent class respectively. It was also found that younger people (ages 18-35) make up a much smaller proportion (19%) of residents with ‘unwillingness to accept’ wind energy developments in their locality⁴.

2.7.4.17 Built Heritage and Archaeology

Some observations have raised concerns about the Proposed Projects impacts on built heritage and the archaeology of the area. Items raised in observations include the impact on St. Aidans church, Kilmanagh Creamery, and an unrecorded fish weir at the proposed Turbine 7 watercourse crossing. A response to concerns regarding the impact on St. Aidan’s church was provided in Section 4.1.13 of the First Party Grounds of Appeal Document. Impacts on Kilmanagh creamery have been appropriately assessed within Chapter 14: ‘Cultural Heritage’ of the EIAR. Regarding the weir structure included in historic mapping at the watercourse crossing east of Turbine 7, no remaining evidence of this structure was recorded during the site walkovers discussed in Chapter 14 of the EIAR. However, as outlined in Chapter 14 of the EIAR, pre-development archaeological testing of the proposed infrastructure in previously undisturbed areas of the Site will be carried out under licence from the National Monuments Service. This is to identify any archaeological features at the earliest stage possible in the project to allow time to deal with any requirements such as preservation in situ (redesign / avoidance) or preservation by record (archaeological excavation). The Applicant confirms that the Project Archaeologist will observe works at this watercourse crossing location to ensure the development does not impact any potential remains of this weir.

2.7.4.18 Turbine Spacing and Site Design

Some observations have raised concerns regarding the spacing and design of turbines within the Site, with claims that they are poorly sited and that separation distances will cause turbulence within the farm, lead to wake effects reducing energy yield, increasing noise emissions and accelerating wear and tear of turbines.

The design of the Proposed Wind Farm has been an informed and collaborative process from the outset, involving the designers, developers, engineers, landowners, environmental, hydrological and geotechnical, archaeological specialists and traffic consultants. The aim being to reduce potential for environmental effects while designing a project capable of being constructed and viable.

As stated in Chapter 4, Section 4.3.1.1 of the EIAR, the proposed wind turbine and met mast layout has been optimised using wind farm design software (WindPro) to maximise the energy yield from the Proposed Wind Farm, while maintaining sufficient distances between the proposed turbines, as well as the met mast, to ensure turbulence and wake effects do not compromise turbine performance and compilation of meteorological data.

In conclusion, the proposed Wind Farm layout has been carefully designed using industry-standard software to optimise energy yield while maintaining appropriate separation distances. The design process has been a collaborative effort, ensuring technical feasibility while minimising environmental impact.

Please refer to Chapter 3 and Chapter 4 of the EIAR for further details in relation to the locations of the Proposed Wind Farm turbines and associated infrastructure.

27.1.9 Policy and Legislation

A number of submissions make reference to policy and legislation in relation to the Proposed Project, particularly in relation to the Kilkenny City and County Development Plan 2021-2027 (KCCDP), with claims that the Proposed Project is in contravention of the KCCDP.

It should be noted, however, that as outlined in Section 6.4 of the Planning Report submitted with the Application, the parts of the KCCDP which are subject to a ministerial direction are taken not to have come in effect. Accordingly, the Wind Energy Strategy Areas and its associated policies cannot be taken into account in the assessment of the Proposed Project.

Despite the absence of a Wind Energy Strategy, as set out in detail in Chapter 3 of the EIAR, a detailed environmental constraints assessment was conducted which led to the siting of turbines wholly within the Acceptable in Principle (AIP) and Open To Consideration (OTC) Areas. Furthermore, the KCCDP is supportive of renewable energy developments, such as the Proposed Project, as it sets out the need for Kilkenny to transition to a low carbon and climate resilient County with a focus on renewable energy to increase the County's energy sustainability and security. Specifically, a strategic aim of the KCCDP is to generate 100% of the County's electricity demand through renewable energy by 2030, and the Proposed Project will directly support this objective.

The KCCDP, is supportive of the Proposed Wind Farm, as it will directly contribute to the onshore wind energy target of 9GW and 80% renewable energy share as set out in CAP25. The Proposed Project will generate clean, renewable energy, which will be integrated into the grid, helping to electrify and decarbonise other sectors, reducing the reliance on imported fossil fuels and non-renewable sources such as coal and oil. As such, reducing GHG emissions and helping to transition towards a low carbon and climate resilient economy and society.

Furthermore the Proposed Wind Farm aligns with the National Policy Objectives in relation to climate resilience and renewable energy as set out in the National Planning Framework First Revision. The Regional Spatial and Economic Strategy for the Southern Region (where the Proposed Project is located) also supports the promotion of renewable energy in the region.



Importantly, none of the refusal reasons cited by the Local Authority related to contravention of local policy objectives. The Proposed Project is strongly supported by the policies and objectives of the KCCDP, as it will support the County in achieving its strategic aim of generating 100% of electricity demand from renewable energy sources, transitioning to a low-carbon and climate resilient economy and society and supporting national renewable energy and climate action targets. Accordingly, It is submitted that the Proposed Project does not contravene local policy.

In conclusion, All matters and observations relating to policy and legislation made to the commission have been comprehensively addressed in Section 4.1.18 of the First Party Grounds of Appeal document and reiterated in this RFI. Furthermore, Compliance of the Proposed Project against relevant policies and objectives, and development management guidance of the KCCDP has been demonstrated Chapter 2 (Background and policy) of the EIAR and Section 6.4 of the submitted Planning Report included with the application.

CONCLUSION

The information provided in this Response to Further Information, and the accompanying appendices constitutes a full and comprehensive response to the Further Information Request received from the Commission on the on the 6th of October, 2025. Responses to third party submissions have also been provided within this RFI, addressing the new submission items that were not previously responded to in the First-Party Grounds of Appeal Document submitted to the Commission.

In summary, it is determined that the Proposed Project is strongly supported by European, national, regional and local policies and guidelines aimed at achieving the transition to a low carbon and climate resilient economy, increasing renewable energy generation, and enhancing energy security. Specifically the Proposed Project will contribute to achieving the target of generating 9GW of electricity from onshore wind and 80% renewable energy share by 2030, as set out in CAP25.

Therefore, it is respectfully requested that the Commission overturn the decision of Kilkenny County Council and grant planning permission for the Proposed Development in accordance with the provisions of proper planning and sustainable development.

Cathy Carleton

From: Mike Amiel Mekell <mamekell@mkoireland.ie>
Sent: Tuesday 28 October 2025 16:25
To: Appeals2
Cc: Alan Clancy; Eoin McCarthy; Micheal Cahill
Subject: RE: 230502-h Briskalagh Renewable Energy Development - Response to Further Information - ACP Ref. 322154-25 (Email 2 of 5)
Attachments: RFI Appendix 1 - An Coimisiún Pleanála Further Information Request.pdf; RFI Appendix 2 - Additional and Ammended Layout and Detailed Drawings.pdf

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

An Coimisiún Pleanála,

Due to the large file size of the documents, multiple emails will be issued. **This is email 2 of 5.**

Is mise le meas,
Mike.

Mike Amiel Mekell BA, MSc, RTPI Licentiate
Planner

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From: Mike Amiel Mekell
Sent: Tuesday 28 October 2025 16:22
To: Appeals2 <appeals@pleanala.ie>
Cc: Alan Clancy <aclancy@mkoireland.ie>; Eoin McCarthy <emccarthy@mkoireland.ie>; Micheal Cahill <mcahill@mkoireland.ie>
Subject: 230502-h Briskalagh Renewable Energy Development - Response to Further Information - ACP Ref. 322154-25 (Email 1 of 5)

An Coimisiún Pleanála,

On behalf of our client Briskalagh Ltd. (the Applicant), MKO wish to submit a Response to the Further Information Request (ACP Ref. 322154-25) issued by An Coimisiún Pleanála on the 6th of October 2025, under Section 132 of the Planning and Development Act 2000 (as amended).

Please see attached a Cover Letter, Response to Further Information report and its associated appendices. Due to the large file size of the documents, multiple emails will be issued. **This is email 1 of 5.**

I would be grateful if you could please confirm receipt of this email and the attached submission.

If you require any further details, please don't hesitate to get in touch.

Thanks so much for your time and consideration.

Is mise le meas,
Mike.

Mike Amiel Mekell BA, MSc, RTPI Licentiate
Planner

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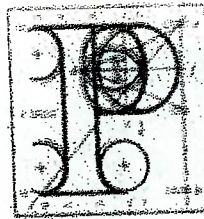
APPENDIX 1

**AN COIMISIÚN PLEANÁLA
FURTHER INFORMATION
REQUEST**

Our Case Number: ABP-322154-25

Planning Authority Reference Number: 2560003

Your Reference: Briskalagh Limited



An
Coimisiún
Pleanála

MKO
9C Beckett Way
Parkwest Business Park
D12 XN9W

Date: 06 October 2025

Re: For a period of 10 years for a development at the site. The development will consist of the provision of 7 no. wind turbines, and all ancillary works and apparatus. An Environmental Impact Assessment Report and Natura Impact Statement has been prepared in respect of the proposed development and accompany this application.

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, Pi

Dear Sir / Madam,

I have been asked by An Coimisiún Pleanála to refer to the above-mentioned appeal.

Please note: this letter supersedes our original letter dated 15 July 2025

The Commission has examined the appeal and is of the opinion that certain information is necessary for the purpose of enabling it to determine the appeal.

In accordance with section 132 of the Planning and Development Act, 2000, (as amended), you are required to submit, on or before 28 October 2025, the following document/particulars/other information:

Biodiversity

1. You are required to submit an updated AA Screening Report and NIS which has regard to the changes to the SSCO for the River Barrow and River Nore SAC, as published on 6th June 2025.
2. It is noted that Otter is a QI species of European sites within the Zone of Influence (Zoi) of the proposed development (i.e. River Barrow and River Nore SAC [002162]). All aspects of the proposed development which could result in significant effects on Otter must be considered and assessed within the NIS. Mitigation measures designed to avoid any adverse effects on site integrity must be included and assessed for effectiveness within the NIS. In this regard, the Applicant is requested to submit a revised NIS which includes this information, including details of all Otter activity within all aspects of the proposed development (wind farm site, grid connection etc). Furthermore, the Applicant shall outline in detail their survey methodology for this QI species both within the proposed wind farm site and along the proposed grid connection route to determine its adequacy.
3. The proposed grid connection route includes underground cabling works which will cross beneath the River Nore SPA [004233] which is designated for Kingfisher. It is noted that no information on the baseline

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D01 V902

noise conditions at this location and predicted noise/vibration levels associated with the HDD are included in the NIS such that potential significant disturbance effects on kingfisher can be determined. In this regard, the Applicant is requested to submit a revised NIS which responds to this issue which includes the provision of baseline noise conditions, noise/vibration levels associated with HDD, timing and duration of works etc. The Applicant shall also clearly outline the survey methodology adopted for Kingfisher along this section of the River Nore to determine its adequacy.

4. You are requested to submit a detailed site layout plan for the crossing of the River Nore where HDD is proposed. The submitted plan shall clearly identify the locations of the launch and reception pits on either side of the river along with details of all the proposed mitigation measures. A similarly detailed layout plan shall also be provided for all other locations where HDD is proposed along the grid connection route.

5. You are requested to submit an indicative landscape plan and section diagram for the proposed riparian buffer along the Tullaroan Stream (known locally as the Kilmanagh/Tullaroan River). This plan shall provide details of the proposed planting and protective fencing (if required).

6. You are requested to submit a site-specific plan and section diagram of the bridge crossing over the Tullaroan Stream between T6 and T7. The plan and section diagram shall include spot levels for the riverbed and banks and shall clearly illustrate the relationship between the proposed clear span bridge and the new access roads on either side of the watercourse. The plan shall also include details of the relevant mitigation measures required for the protection of water quality.

7. Noting the width of the existing access road leading from the site entrance on the L1009 (Kilmanagh Village) to T7 and the dimensions provided for the proposed and upgraded access roads (including its associated drainage), concerns are raised that the proposal will result in the loss of additional hedgerows and tree lines along this route. This includes a grouping of mature trees at the location where the new access road is proposed. In addition, it is noted that there are tree lines and dense hedgerows that entirely enclose a small field located directly to the north-east of T5, adjacent to the proposed spoil management area. The extent of hedgerow and tree loss would appear to be underreported given the extent of new access tracks proposed at this location. The Applicant is therefore requested to respond to this issue. Should further hedgerow removal/tree loss be required, this shall be clearly identified, and the extent of habitat loss should be updated within EIAR accordingly. It is also noted that the Applicant's Bat Survey Report (Appendix 6-2) should be updated to have regard to the additional hedgerow removal/tree loss on site, if required.

8. You are advised that updated guidance has recently been published from DHLGH on Regulation 54 derogation process for protected species listed on Annex IV (Applications for Regulation 54 Derogations for Annex IV species, Guidance for Applicants, Version 1.0, 1 July 2025). In summary, this guidance requires any derogation to be granted before the approval of the consent to the proposed activity. Noting the number of mature trees on site that have been identified as presenting potential roosting features and which require removal, the Applicant shall satisfy themselves that they can comply with the updated guidance. This may necessitate further surveys of the trees in question to determine whether a derogation may be required.

9. It is noted that there are potential roosting features present within a number of the bridges along the proposed grid connection route (as per Appendix 6-2 of the EIAR). A combination of flatbed formation and horizontal directional drilling are proposed at these bridges. Notwithstanding the Applicant's response in their grounds of appeal, the level of noise and vibration associated with the proposed works is unclear. Uncertainty therefore remains regarding the potential impact of the works on roosting bats and whether a derogation may be required. In this regard, the Applicant is requested to respond to this matter.

10. You are requested to provide a rationale for the exclusion of amphibians or reptiles as KERs given that suitable habitat exists within site and the absence of dedicated surveys for these species. Should amphibians or reptiles be included as KERs, the EIAR should be updated to include suitable mitigation measures.

11. You are required to submit a restoration plan (plan and section diagrams) for the proposed borrow pit.

Noise

1. In terms of cumulative noise impacts associated with the construction phase, it is noted that no detailed analysis of other projects has been provided which would assist in establishing their potential to contribute

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to cumulative effects in combination with the subject proposal. An example of which includes the multiple grid connection routes connecting wind farms in the area to Ballyragget 110kV Substation. The Applicant is therefore requested to respond to this issue.

2. You are required to submit omni-directional noise predictions for each NSL in tabular format for the proposed development only.

3. You are required to submit the predicted cumulative omni-directional turbine noise levels for each NSL in tabular format, which illustrates both the day and night criterion and identifies any relevant excess.

4. It is acknowledged that the you have submitted a map of the study area which shows the predicted cumulative noise level contours at 9m/s wind speed (i.e. Appendix A of Appendix 3 of the First Party Appeal prepared by AWN Consulting) and all NSLs included within Appendix 12-7 (Predicted Cumulative Noise Levels) appear to have now been identified. From a review of the study area map, it is noted that NSL 270 & 275 are located within the 40dB(A) contour associated with the Foyle Wind Farm. However, a predicted noise level of 35.9dB(A) and 35.3dB(A) has been indicated at these NSLs respectively at 9m/s within Appendix 12-7 of the EIAR. You are therefore requested to clarify these apparent discrepancies.

Hydrology and Hydrogeology

1. You shall provide a robust rationale for the adequacy of the trial pits provided across the site, noting their depth relative to the depth of the foundations for the proposed turbine bases.

2. Concerns are raised regarding the extent of site investigations undertaken for the proposed borrow pit given its proximity to the aquifer and nearby watercourse on site. Noting its location relative to this regionally important gravel aquifer, you are required to establish the impacts of such an excavation on the potential to impact surface water and groundwater flows in the area. Further detailed site investigations shall be provided to fully establish a conceptual site model for flow regimes in this area of the site.

3. Concerns are raised regarding the complete absence of site investigations at the location of T7. Notwithstanding the rationale provided by the Applicant within the Chapter 9 of the EIAR, the absence of data prohibits an adequate assessment of the potential impacts of the development on both groundwater quality and flow dynamics and surface water flows and quality at this location. Therefore you are required to undertake further site investigations proximate to the location of T7 to address this issue.

4. You are required to provide an assessment pertaining to all potential impacts on surface waters flows and/or groundwater flows as a result of dewatering associated within the excavations for the turbine foundations.

5. It is noted that the crossing of the Tullaroan Stream and some access roads are proposed to be located within a flood zone (National Indicative Fluvial Mapping). In addition, there is a history of flood events immediately downstream of the site within the village of Kilmanagh. In this regard, you are required to submit an updated Flood Risk Assessment (FRA) which includes detailed site-specific hydraulic modelling of the Tullaroan Stream which should examine the potential impact on the existing floodplain or on flood risk elsewhere downstream. The updated FRA shall also have regard to the alterations that have been undertaken to the Tullaroan Stream within the boundaries of the site.

Roads and Traffic

1. With the exception of the concrete deliveries for the turbine foundations (7 no. days) and the delivery of the abnormally sized loads (19 no. nights), all other vehicles are proposed to access the wind farm site via the new junction proposed from the L5024 to the north. As per Figure 15-1a of the EIAR, deliveries and construction traffic will access the site from direction of Kilkenny City via the L1007. Vehicles will pass through the village of Tullaroan and then continue south along the L5023, before entering the site via the L5024. To minimise the impact on the local road network, it has been proposed that all vehicles leaving the site will turn right when exiting the site and continue along the L5024 until it meets the L1010. Traffic will then continue south until it meets the R695 and from there, travel east in the direction of Kilkenny City. It is noted that the link flow assessment has been prepared for the section of the turbine delivery route only (i.e. 7 no. days and 19 no. nights as per above). It would therefore appear that the additional volumes of traffic through the settlement of Kilmanagh would be significantly less than what has been depicted within the link flow assessment. However, given the volume of traffic that will utilise the 'Alternative Route' as per Table 15-15 of the EIAR (i.e. General construction + grid connection construction (222 days), and Turbine delivery (standard HGVs) + grid connection construction (7 days)), you are required to

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demonstrate that the surrounding local road network can adequately cater for the additional traffic generated during the construction phase of the proposed development.

2. Full road closures and diversions are proposed for Section Nos. 5 & 6 (Table 15-29 of the EIAR) of the proposed grid connection route. This comprises a c. 8.1km stretch of the R694 between Freshford Village and the N77 and it is confirmed that this portion of the route will be subject to road closures for c. 81 days. Noting that the R694 is a key route linking Freshford to Ballyragget and the uncertainty regarding the adequacy of the diversion routes to cater to significant increases in commercial traffic (notably the L1810 and L1811 for Section 5 and the L1811 for Section 6), you are required to consider whether full road closures along this route can be avoided or significantly minimised given that work zones works will typically vary from 100m to 200m in length. Where diversions cannot be avoided, you shall demonstrate that the indicative diversion routes can adequately cater for two-way traffic.

3. During the proposed road closures and diversions within Section Nos. 1 and 2 (Table 15-29) of the proposed grid connection route, you shall clarify how construction access to the site via the L5024 is to be maintained and demonstrate that the indicative diversion routes can adequately cater to the volumes of construction traffic during this period (i.e. 58 no. days).

4. As per Table 15-9 (Trip generation - Stage 1 - Site preparation and groundworks - total movements and volumes per delivery day - Proposed Wind Farm) of the EIAR, it is estimated that a total of 2,400 truck loads of stone will be required for the construction of the proposed wind farm. This constitutes the majority of 2-way PCUs/day (51.59 out of a total of 70.51) during this phase of the construction works. You are therefore requested to clarify whether this is in addition to the site-won material (c. 70,000m³) from the proposed borrow pit, noting the estimated volume (c. 70,000m³) that is to be extracted.

5. You are required to submit a proposed boundary treatment plan/elevation for the northern site access off the L5024.

Cultural Heritage

1. Section 14.3.4.8 of the EIAR notes that there are a 6 no. bridges (CH3-8) of local cultural heritage merit located on the proposed grid connection route and it is proposed to utilise directional drilling at all bridge crossings. Therefore, it is contended that direct effects to the structures are not anticipated. However, it is stated elsewhere in the Chapter and the accompanying drawings that Horizontal Directional Drilling (HDD) is only proposed where the grid connection will cross the River Nore and at Grange Bridge (NIAH Reg. 12400902) (WC2). The underground cables are proposed to be laid in a flatbed formation for all other watercourse crossings. Furthermore, it is noted on Table 4-5 of Appendix 6-2 (Bat Survey Report) of the EIAR that HDD is proposed at WC2, WC10 and WC13. You are therefore requested to clarify these apparent discrepancies and clarify the method proposed for each river crossing.

2. Concerns have been raised by the Planning Authority's Conservation Officer regarding the potential impact of the works on the various historic bridges along the proposed grid connection route i.e. structural damage, insufficient road depth to accommodate the new cables and the potential requirement for heightened parapets due to road build up. You are required to respond to this issue and put forward proposals for HDD at bridges both included on the Record of Protected Structures (RPS Ref. C886) (WC6) and the National Inventory of Architectural Heritage (NIAH Ref. Reg. 12305031 (C886) and 12305012 (New Bridge) (WC5)) located within the urban centre of Freshford.

Landscape and Visual Assessment

1. As per Section 13.2.1 (Scope and Definition of the Landscape and Visual Impact Assessment (LVIA) Study Area) of the EIAR (Chapter 13), a study area of 15km, referred to as the 'LCA Study Area', was deemed appropriate for effects on landscape character. Notwithstanding this, a 20km study area has been provided on all mapping within the Chapter. Please clarify whether a 20km study area has been adopted for the purposes of the LVIA.

General

1. In terms of the consideration of alternatives (Chapter 3 - Consideration of Reasonable Alternatives of the EIAR), a total of four no. 110kV substations have been identified by you within 25km of the development site. It is stated that initial grid studies identified Ballyragget 110kV substation as the suitable option and a grid connection route to this substation was considered and assessed to determine its viability. You are required to provide a rationale for the identification of Ballyragget 110kV substation as the optimum connection node for the proposed development.

2. Noting the concerns raised by both the Planning Authority and TII regarding the absence of a plan led approach to private grid connections and its associated impacts, you shall also outline why 'Proposed Grid Connection Underground Cabling Route Option No. 1' was discounted despite this route being adopted for the permitted Farranrory grid connection route (Kilkenny CC Pl. Ref. 21/627) and the absence of an acknowledgement of same within the consideration of alternatives (i.e. Chapter 2 of the EIAR). You are also required to consider further the cumulative impact of the proposed grid connection route from a traffic and transportation perspective given a number of the indicative diversion routes (Section Nos. 5 & 6 (Table 15-29 of the EIAR)) for the proposed grid connection overlap with the permitted grid connection route (Kilkenny CC Pl. Ref. 21/627) serving the Farranrory Wind Farm (Tipperary CC Pl. Ref. 20/972).

3. Having regard to this further information request, you are required to provide a summary of all amendments to the EIAR, NIS and other supporting information. All changes are to be clearly identified. You are also invited to submit any errata/corrections to the EIAR, NIS and any other supporting information with its response to this further information request. As above, all changes are to be clearly identified.

4. You are required to provide a response to any issues raised in the third party observations to the appeal, all of which are enclosed with this letter. If the document/particulars/other information required is/are not received before the end of the specified period, the Commission will dismiss or otherwise determine the appeal without further notice to you in accordance with section 133 of the 2000 Act, (as amended). Your submission in response to this notice must be received by the Commission not later than 5.30 p.m. on the date specified above.

If the document/particulars/other information required is/are not received before the end of the specified period, the Commission will dismiss or otherwise determine the appeal without further notice to you in accordance with section 133 of the 2000 Act, (as amended). Your submission in response to this notice must be received by the Commission not later than **5.30 p.m. on the date specified above.**

Please quote the above appeal reference number in any further correspondence.

If you have any queries in the meantime, please contact the undersigned officer of the Commission at appeals@pleanala.ie.

Yours faithfully,



Daniel O'Connor
Executive Officer
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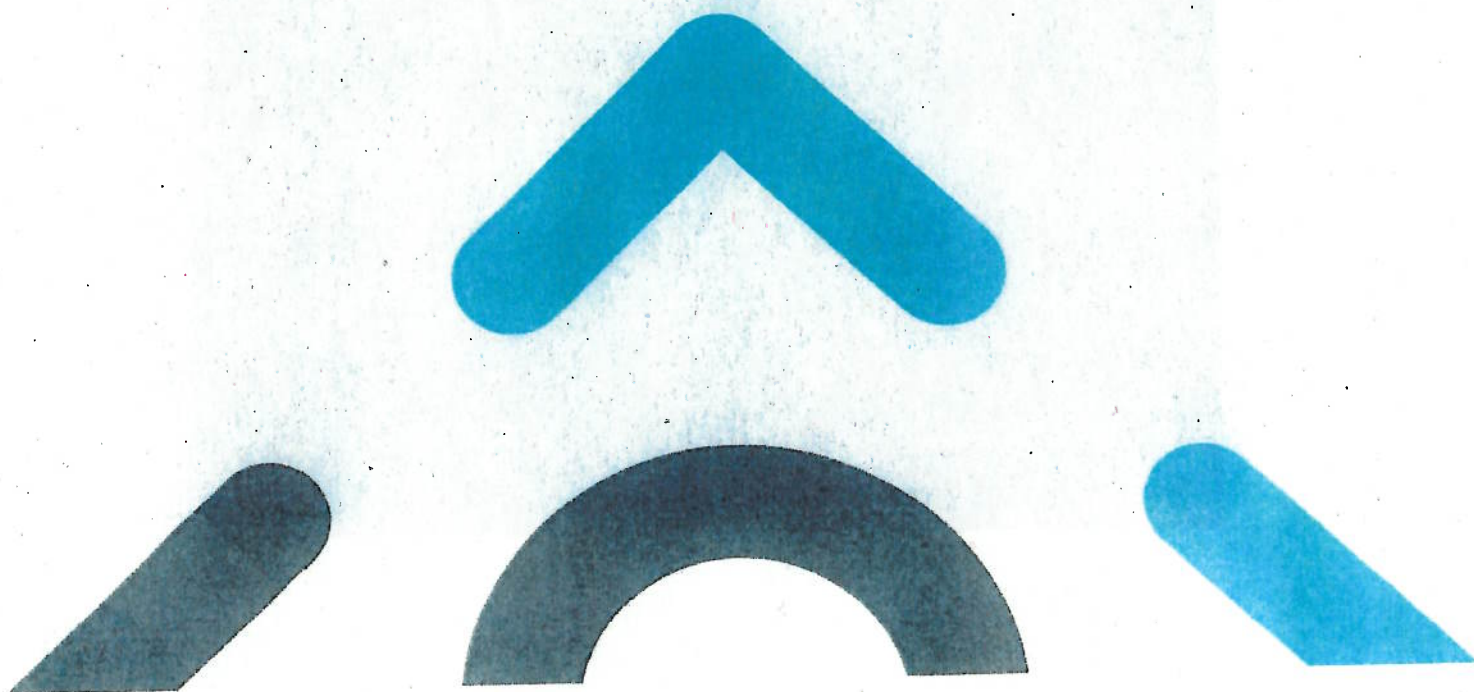
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APPENDIX 2

**ADDITIONAL AND AMENDED
PLANS AND DETAILED
DRAWINGS**

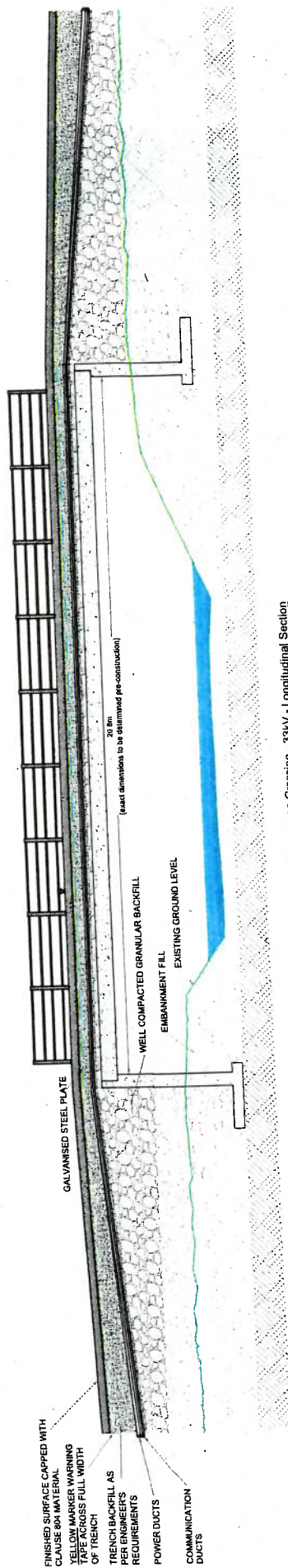
**Proposed Briskalagh Renewable Energy
Development, Co. Kilkenny**
Planning Permission Application Drawings
FURTHER INFORMATION RESPONSE



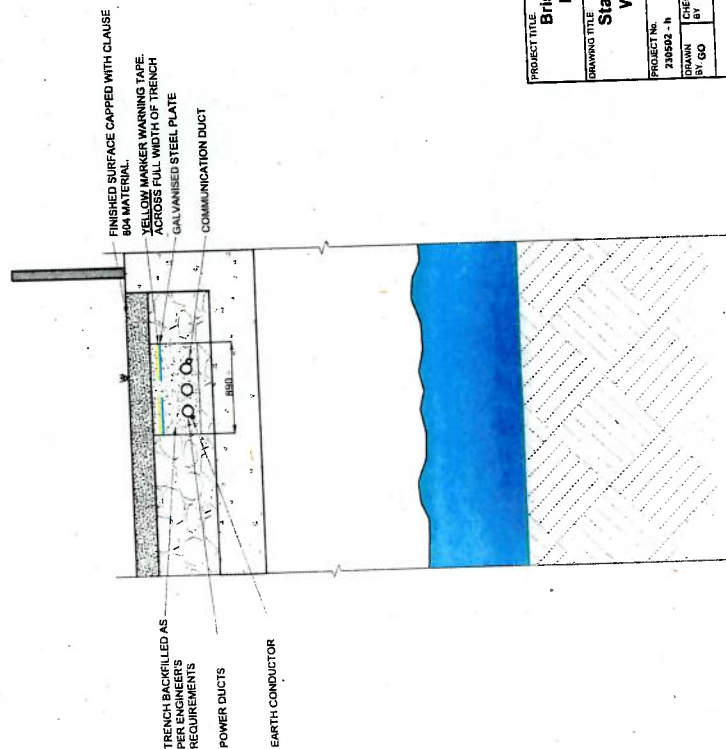
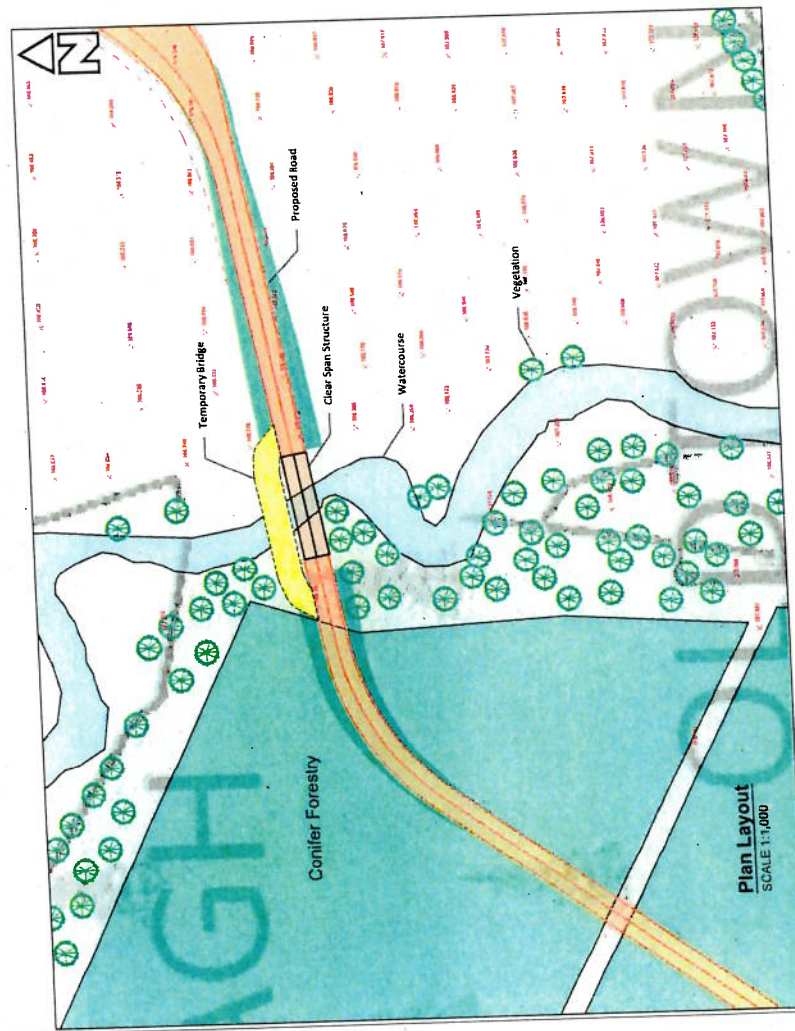


Schedule of Drawings

Drawing No.	Drawing Title	Scale	Page Size
230502 - 52FI	Standard 33kV Clear Span Watercourse Crossing	As shown	A3
230502 - 60FI	Proposed Grid Connection Watercourse Crossing 02	As shown	A3
230502 - 61FI	Proposed Grid Connection Watercourse Crossing 03	As shown	A3
230502 - 62FIF	Proposed Grid Connection Watercourse Crossing 05	As shown	A3
230502 - 63FI	Proposed Grid Connection Watercourse Crossing 07	As shown	A3
230502 - 66FI	Proposed Grid Connection Watercourse Crossing 11	As shown	A3
230502 - 76FI	Proposed Grid Connection Watercourse Crossing 01	As shown	A3
230502 - 77FI	Proposed Grid Connection Watercourse Crossing 06	As shown	A3
230502 - 78FI	Proposed Riparian Planting	As shown	A3
230502 - 79FI	Proposed Access Road from L5024	As shown	A3
DANU-BSK-D004.1FI	Borrow Pit Reinstatement	As shown	A1



Clear Span Watercourse Crossing - 33kV - Longitudinal Section
SCALE 1:10



Clear Span Watercourse Crossing - 33kV - Cross Section
SCALE 1:5

PROJECT TITLE		Briskalagh Appeal - Further Information Response	
DRAWING TITLE		Standard 33kV Clear Span Watercourse Crossing	
PROJECT NO.	DRAWING NO.	SCALE:	AS SHOWN @ A3
230502 - N	230502 - 52/F1		
DRAWN BY	CHECKED	DATE	REVISION
GO	N/A	23.10.2023	FID1

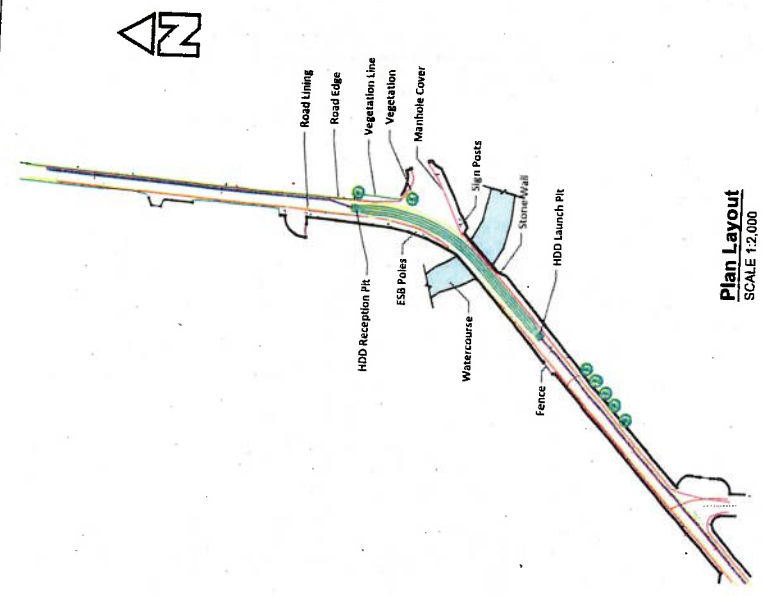


Note: Please refer to Drawing D104 of Appendix 4-3 of the EIA for detail on proposed mitigation measures at this location

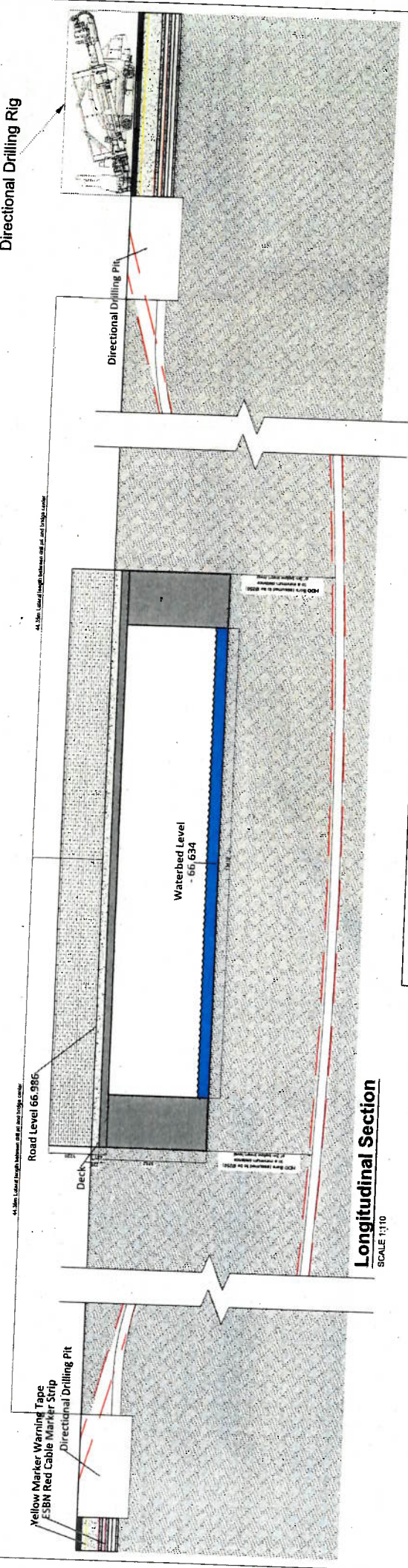


PROJECT TITLE		Briskeagh Appeal - Further Information Response	
DRAWING TITLE		Proposed Grid Connection Watercourse Crossing 02	
PROJECT No.	DRAWING No.	SCALE	AS SHOWN @ A3
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DRAWN BY	CHECKED BY	DATE	REVISION
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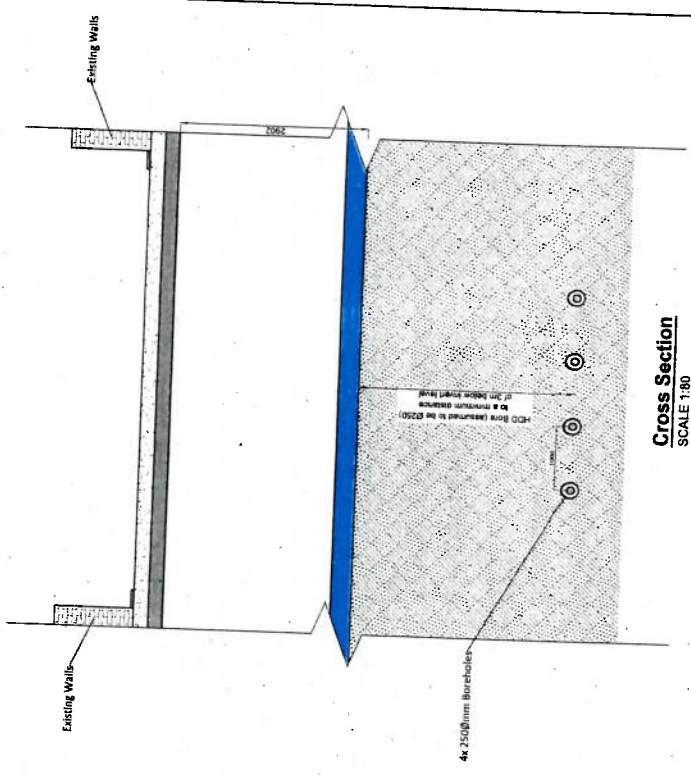
Plan Layout
SCALE 1:2,000



Longitudinal Section
SCALE 1:10



Cross Section
SCALE 1:80



Directional Drilling Pit

41.5m Lateral length between dist pit and bridge center

41.5m Lateral length between dist pit and bridge center

Existing Wall

Yellow Marker Warning Tape
ESB Red Cable Marker Strip

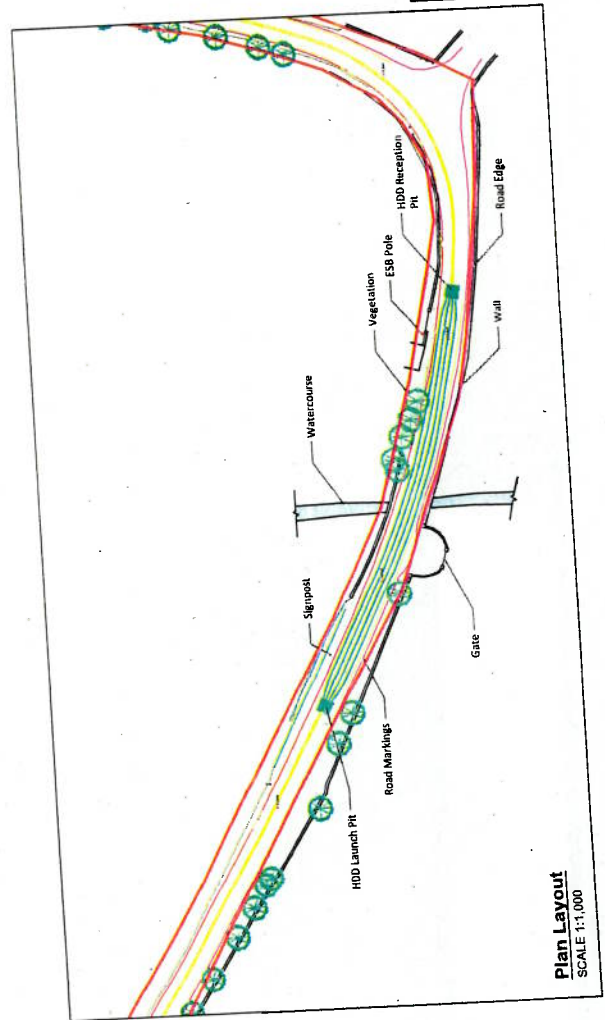
Directional Drilling Pit

Road Level 71.415

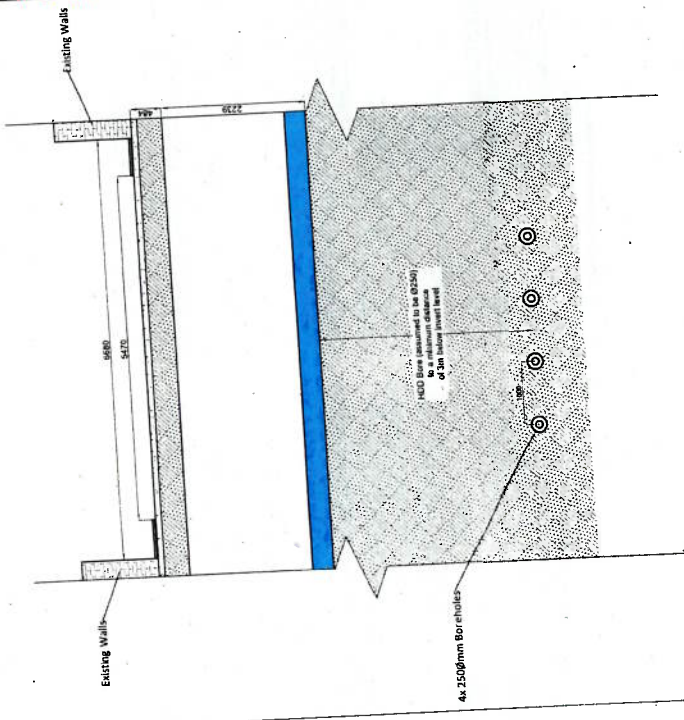
Water Level
60.00

HDD Bore (assumed to be Ø250)
to a minimum diameter
of 300mm

Longitudinal Section
SCALE 1:120



Plan Layout
SCALE 1:1,000



Cross Section
SCALE 1:80

PROJECT TITLE:
**Briskilagh Appeal - Further
Information Response**

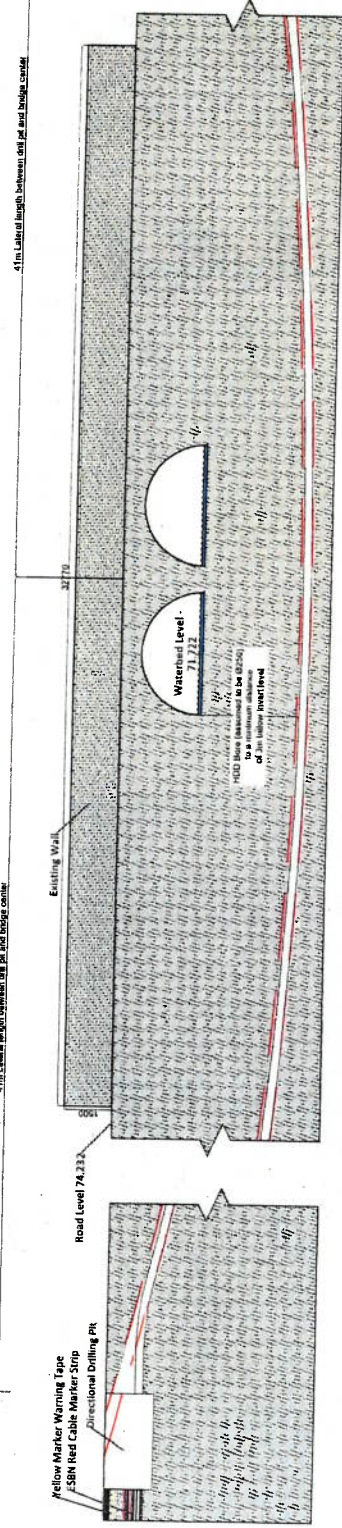
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**Proposed Grid Connection
Watercourse Crossing 03**

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DRAWN BY: GD	CHECKED BY: N/A	DATE: 23.10.2025
		REVISION: F(01)



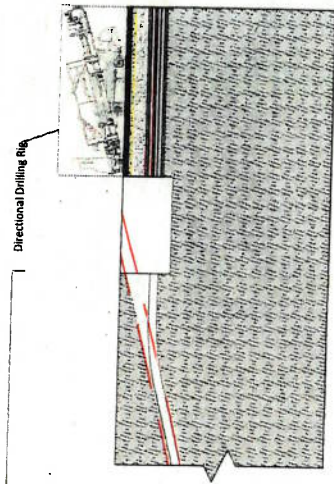
For more information, visit us at www.mko.ie

41m clear length between off pt and bridge center

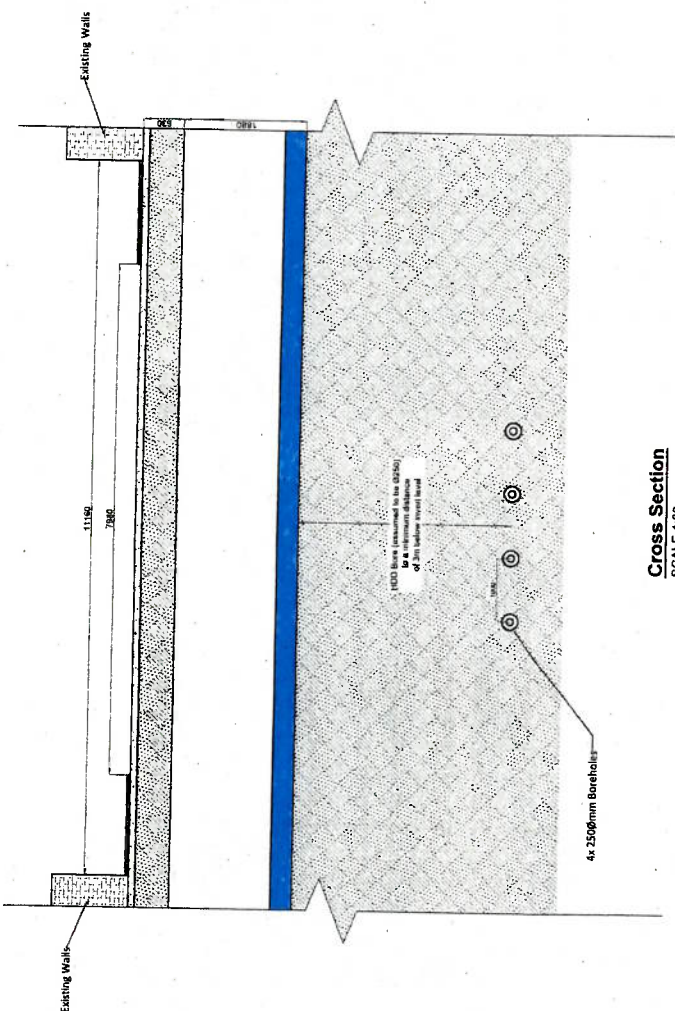


Longitudinal Section
SCALE 1:100

41m lateral length between off pt and bridge center



Plan Layout
SCALE 1:1,000

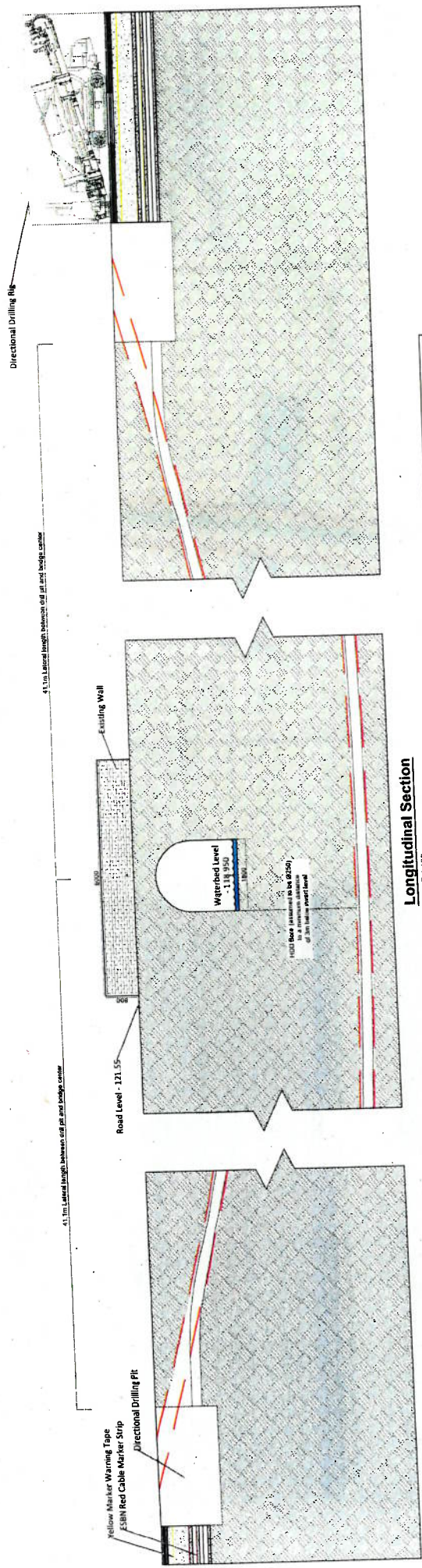


Cross Section
SCALE 1:80

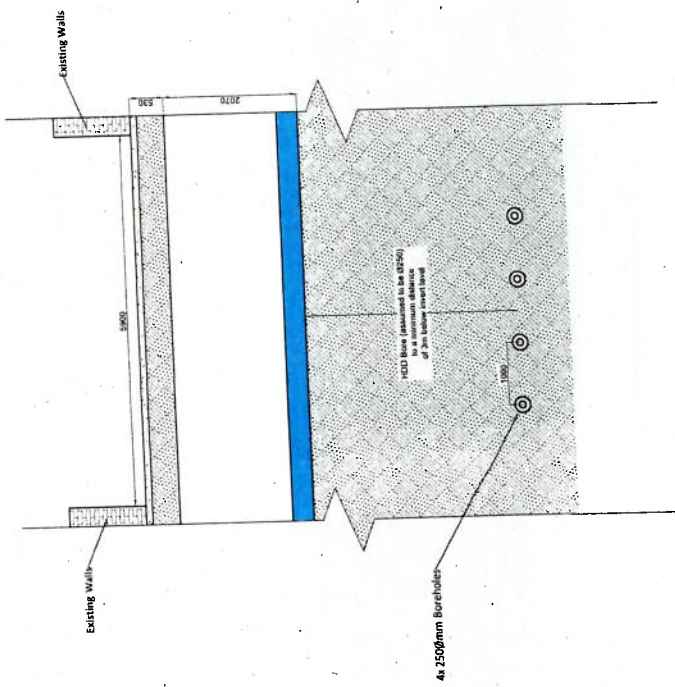
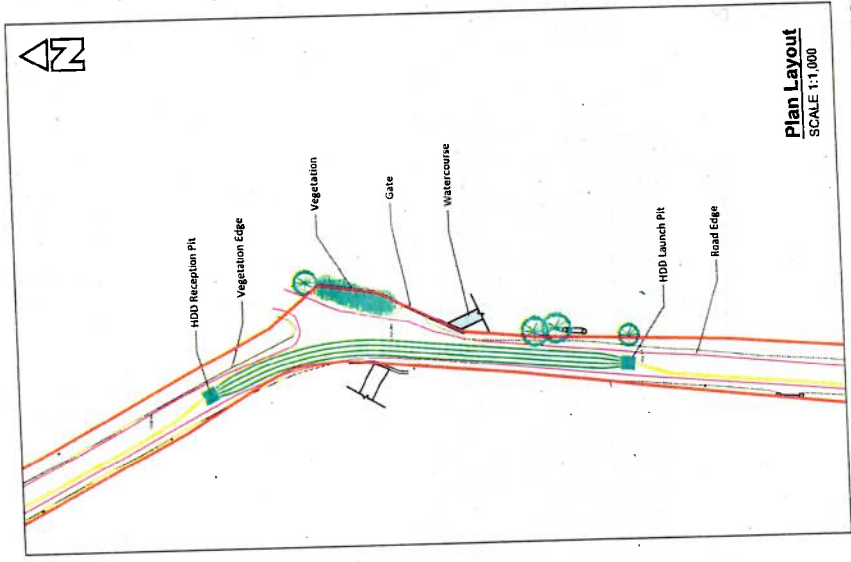
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DRAWING TITLE		Proposed Grid Connection Watercourse Crossing 05	
PROJECT No.	230602 - N	DRAWING No.	230602 - 001
DRAWN BY	GD	CHECKED BY	NA
DATE	23.10.2023	REVISION	F101
SCALE		As Shown @ A3	



Unit 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100



Longitudinal Section
SCALE 1:100

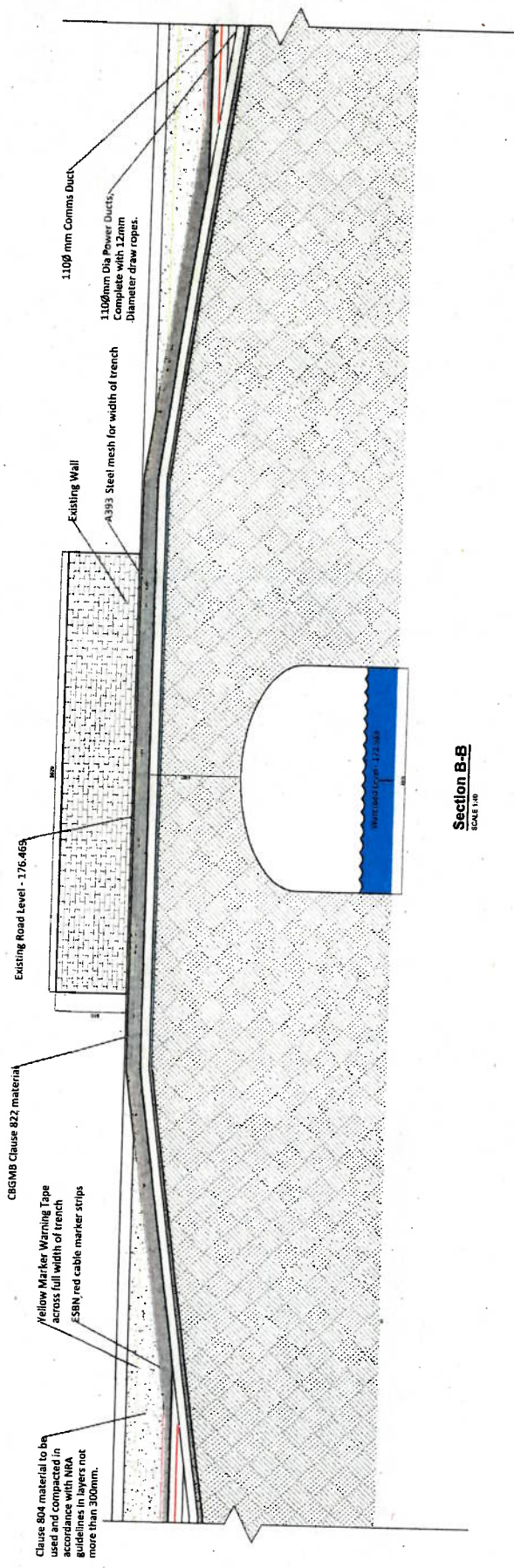


Cross Section
SCALE 1:80

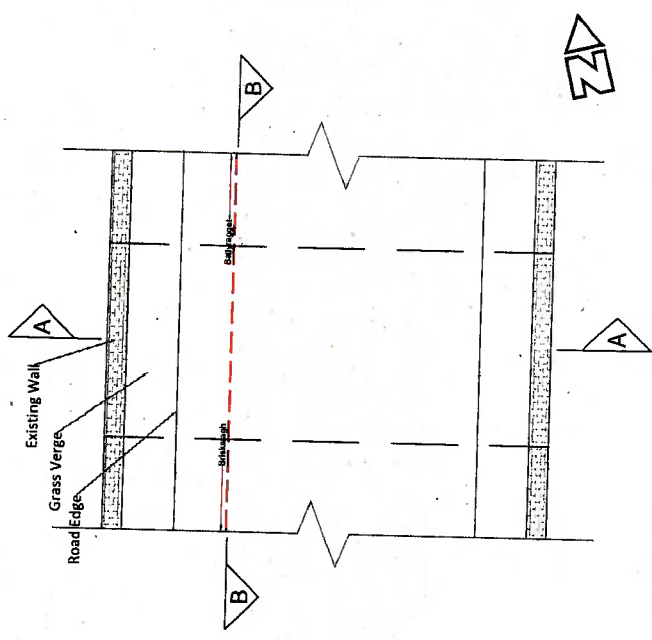
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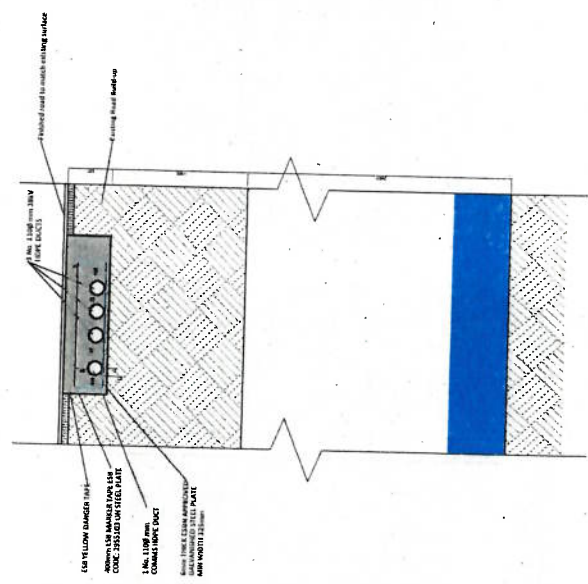
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Section A-A
SCALE 1:20



Section B-B
SCALE 1:40



Plan View
SCALE 1:80

PROJECT TITLE		Briekalagh Appeal - Further Information Response	
DRAWING TITLE		Proposed Grid Connection Watercourse Crossing 11	
PROJECT No.	230502 - H	DRAWING No.	230502 - 04F1
DRAWN BY: GO	CHECKED BY: N/A	DATE	23.10.2025
SCALE		AS SHOWN @ A3	REVISION: F101

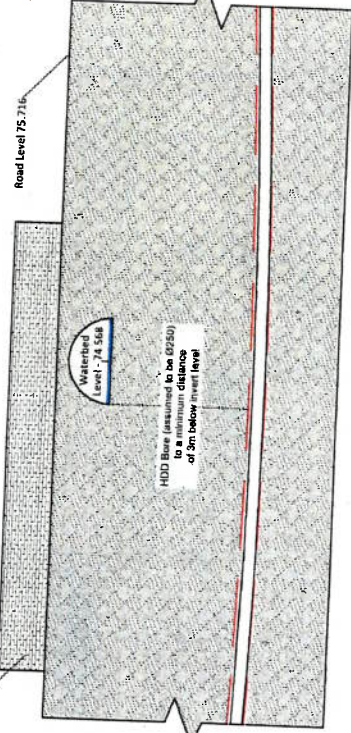
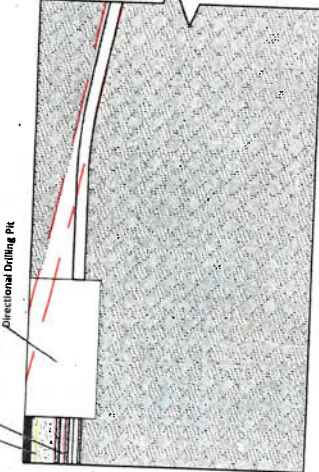


35.4m Lateral length between drill pit and bridge center

Yellow Marker Warning Tape
ESB Red Cable Marker Strip

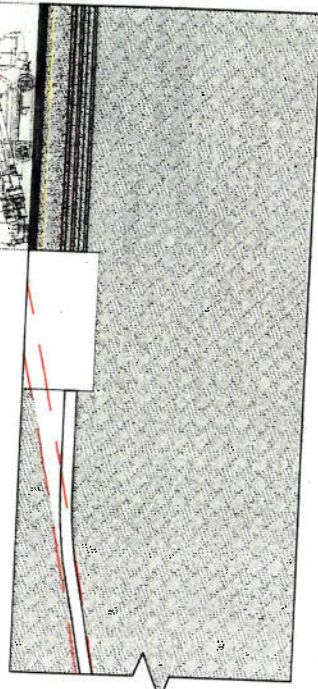
Existing Wall

Directional Drilling Pit



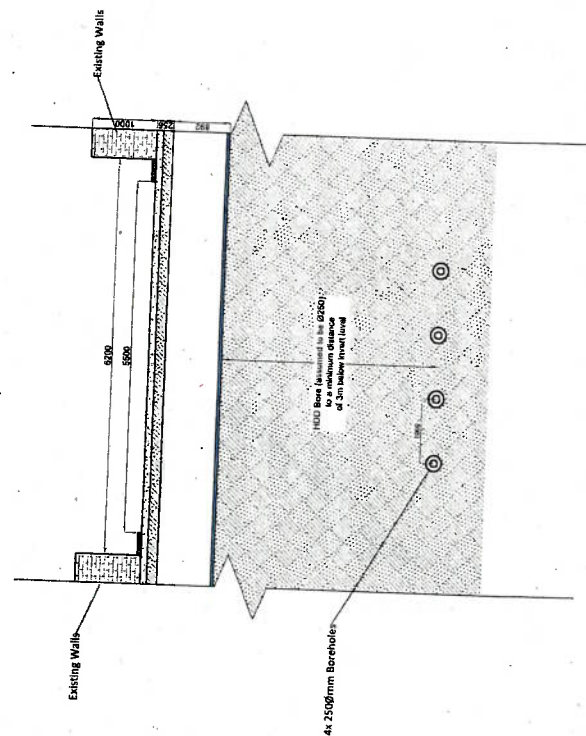
35.4m Lateral length between drill pit and bridge center

Road Level 75.716

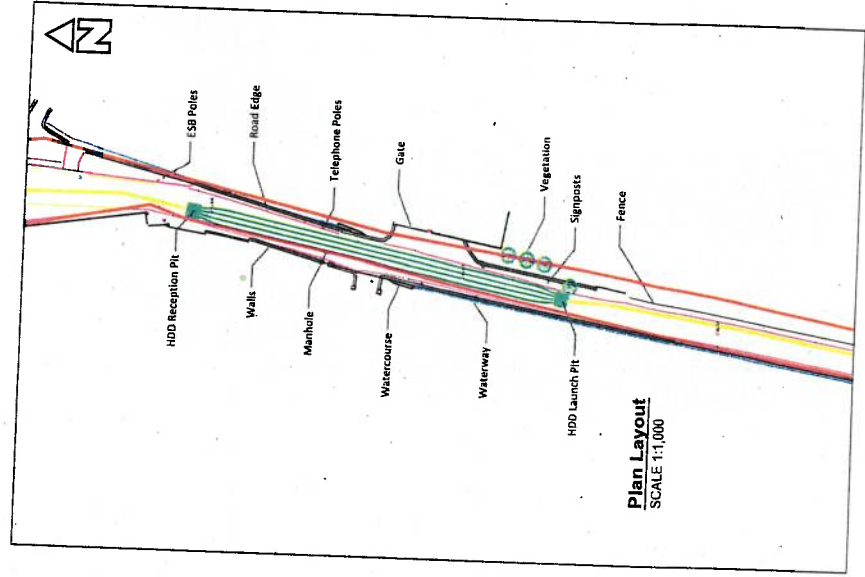


Directional Drilling Rig

Longitudinal Section
SCALE 1:110



Cross Section
SCALE 1:80



Plan Layout
SCALE 1:1,000

PROJECT TITLE		Briskalagh Appeal - Further Information Response	
DRAWING TITLE		Proposed Grid Connection Watercourse Crossing 06	
PROJECT NO.	230502 - N	DRAWING NO.	230502 - T/F1
DRAWN BY	GO	CHECKED BY	N/A
DATE	23.10.2025	REVISION	As Shown @ A3
		F101	



Notes

All saplings will be planted by hand to reduce to potential for bare soil exposure and sediment runoff. This riparian buffer zone will be managed such that it remains uncultivated and no future cutting will be avoided.

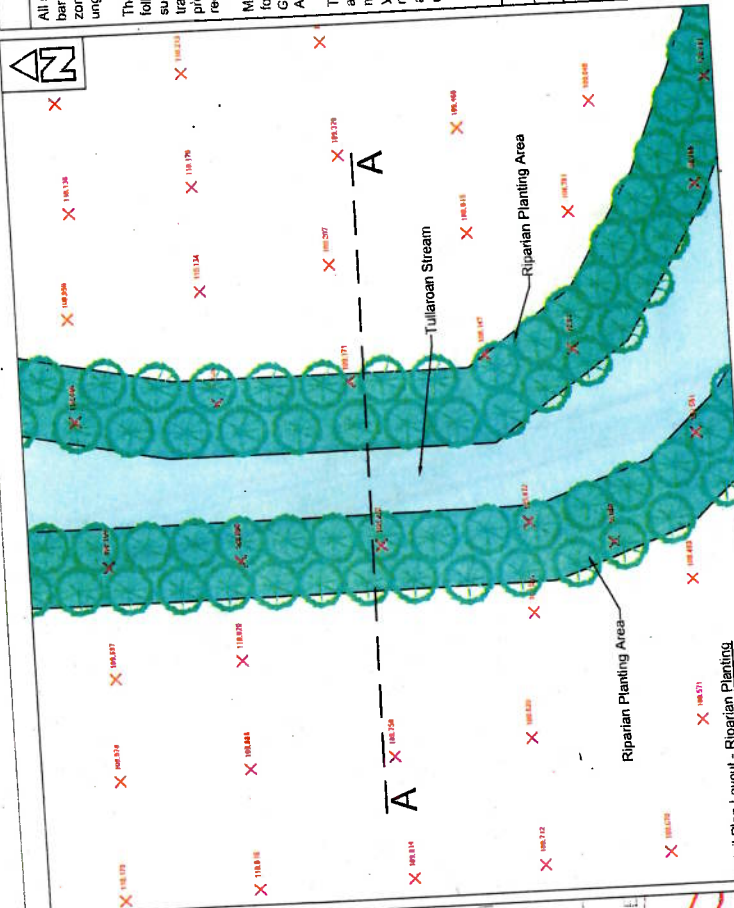
The control and management of the proposed planted areas following planting is critical for riparian establishment and success. The focus will be on minimising disturbance i.e. trampling and grazing. Tree guards are appropriate and will provide protection against grazers and will be inspected regularly.

Maintenance of the proposed woodland planting will be followed out as per the *Native Woodland Establishment GPC9 & GPC10 Silvicultural Standards* (Department of Forest and the Marine, 2015).

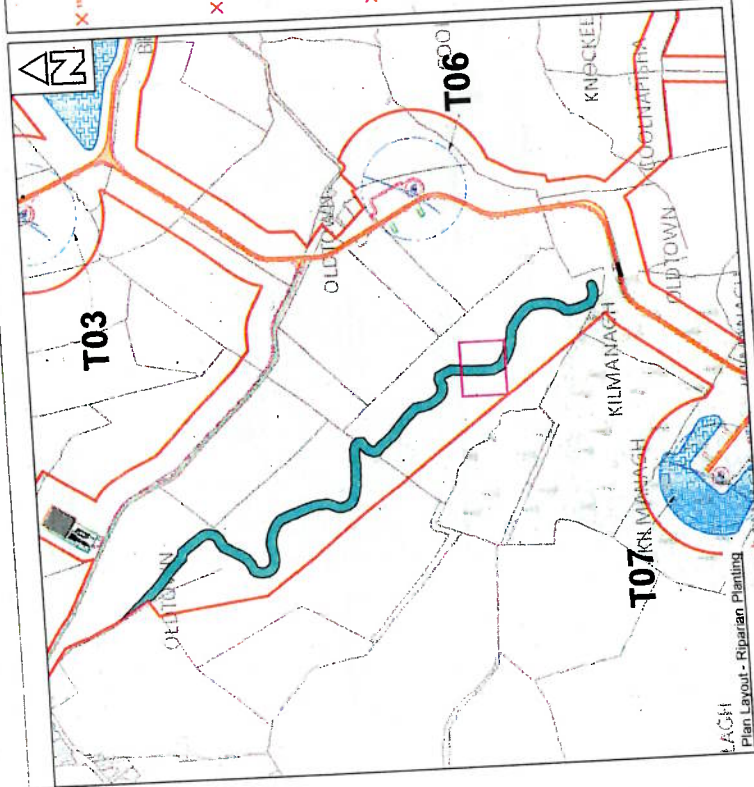
To confirm that habitat creation has been successful the above outlined woodland replanting scheme will be monitored by a qualified ecologist at intervals of 6 months, 1 year, 2 years, and 3 years. Where tree guards are no longer required these will be removed to avoid damage to the tree. If any shrubs are dead or damaged these will be replaced by the next planting season.

Species mix to be finalised in conjunction with the project ecologist.

ecologist.	Species	Size	%
	Alder (<i>Alnus glutinosa</i>)	Bare Root (2-3lit)	30%
	Black poplar (<i>Populus nigra</i>)	Bare Root (2-3lit)	10%
	Downy birch (<i>Betula Pubescens</i>)	Bare Root (2-3lit)	15%
	Willow spp. (<i>Salix</i> spp.)	Bare Root (2-3lit)	20%
	Aspen (<i>Populus tremulus</i>)	Bare Root (2-3lit)	10%
	Hazel (<i>Corylus avellana</i>)	Bare Root (2-3lit)	15%



Plant - Plant - Riparian Planting



AGH
Plan Layout - Riparian Planting



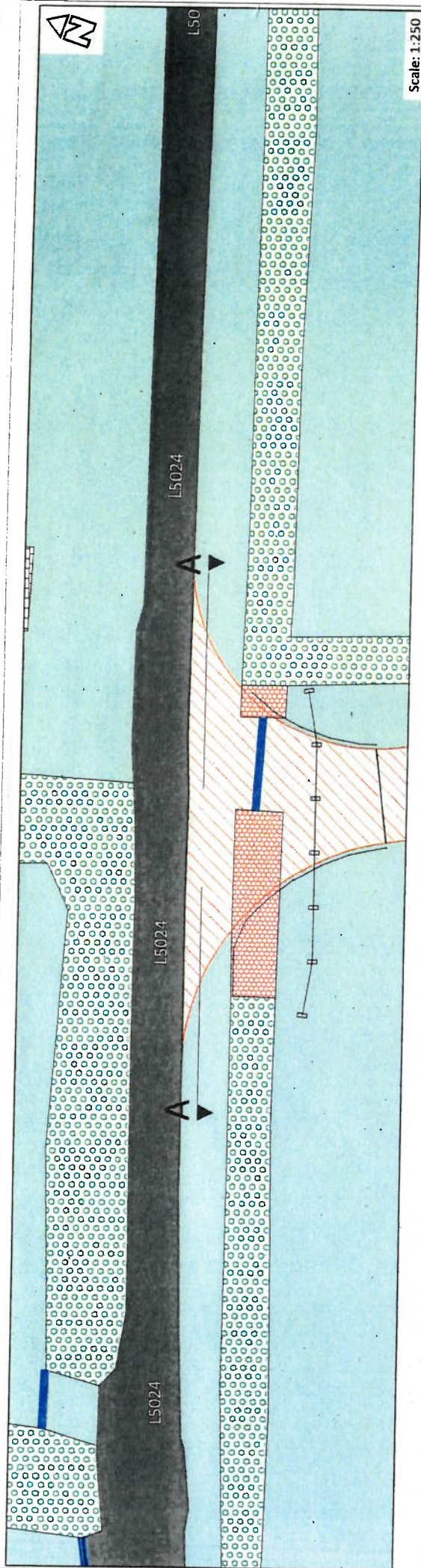
Discoidian Planting

PROJECT TITLE:
**Briskalagh Appeal - Further
Information Response**

DRAWING TITLE:
**Proposed Riparian
Planting**

PROJECT No.	DRAWING No.	SCALE.
230582 - h	230582 - 78F1	As Shown @ A3
CHECKED BY: N/A	DATE 23.10.2025	REVISION: F101
DRAWN BY: GO		





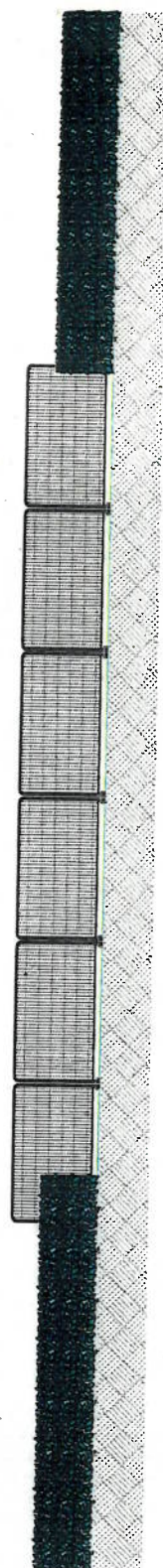
Legend:

- Hedgerow to be removed
- Temporary Fencing
- Stock Proof Fencing
- Access Road

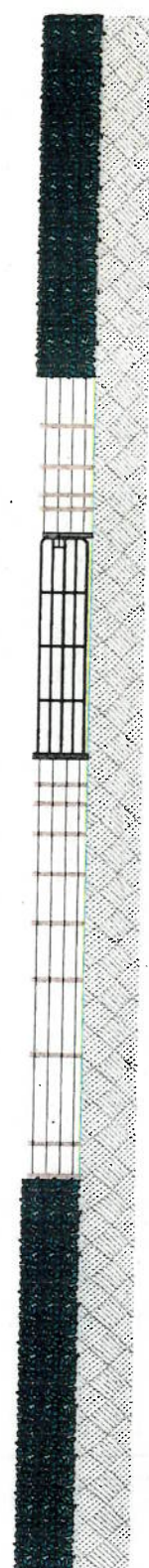
PROJECT TITLE			
Briskalagh Appeal - Further Information Response			
DRAWING TITLE			
Proposed Access Road from L5024			
PROJECT NO.	DRAWING NO.	SCALE	As Shown @ A3
230502 - N	230502 - N		
CHECKED DATE	BY	DATE	REVISION
BY QD	NA	23.10.2025	F01



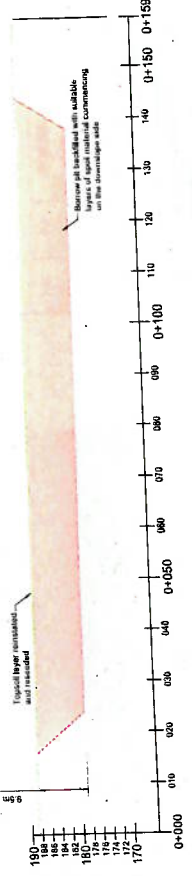
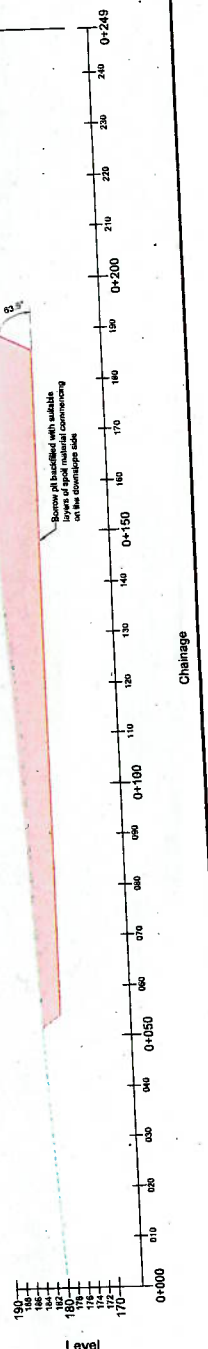
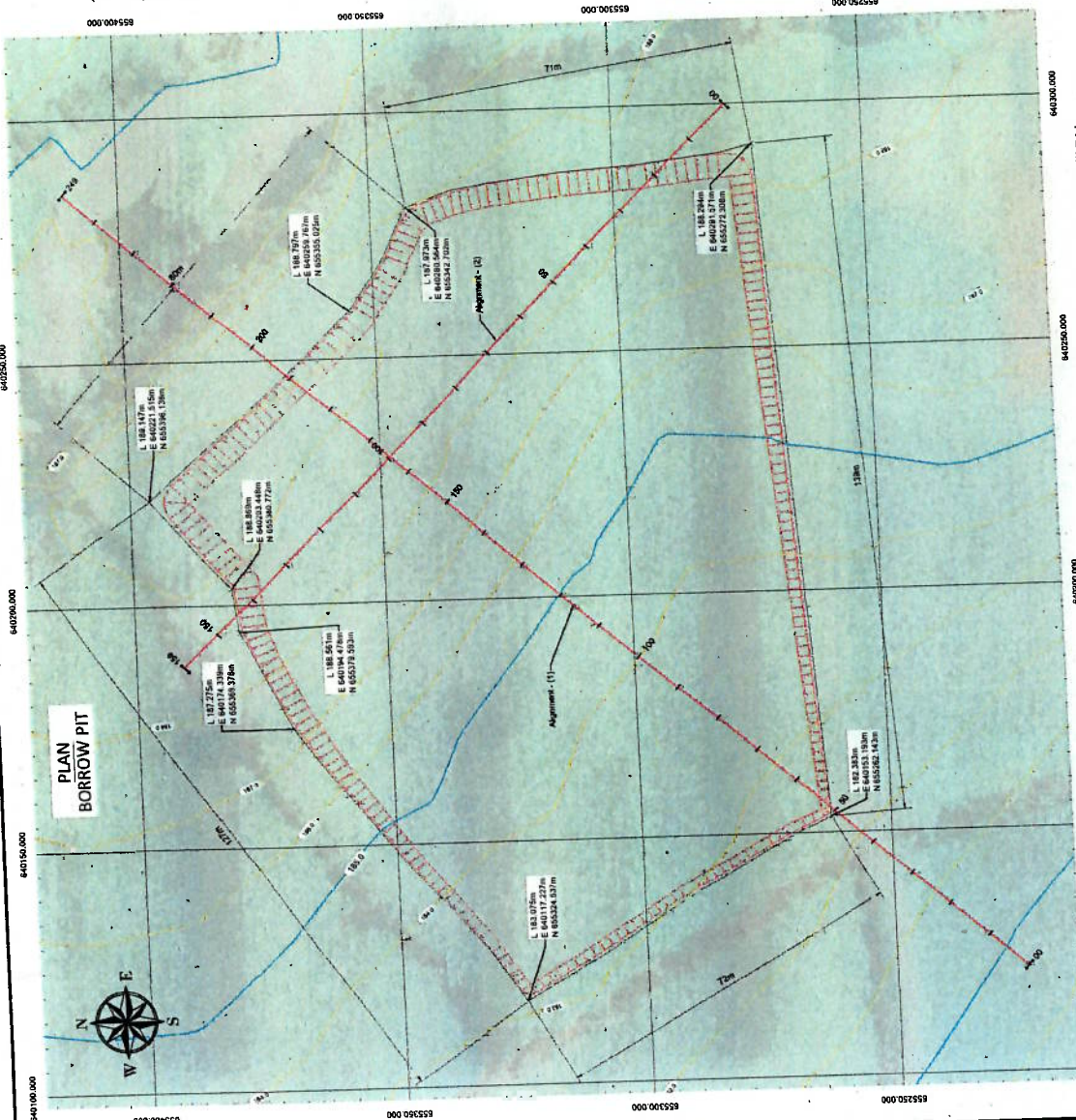
Elevation A-A - Hedgerow to be removed



Elevation A-A - Construction Phase



Elevation A-A - Operational Phase



Chainage

Volume Dashboard	
BORROW PIT - SPOIL VOLUME	98 500 m3

NOTE:
Coordinate system - ITM

BRISKALAGH WIND FARM	
BORROW PIT REINSTATEMENT	
DATE: 1:500	APPROVAL: A. ZOLOTAROV
DATE: 20/06/2024	DATE: 20/06/2024
PLANNING: C. O'DUBHATHAIGH	DATE: 20/06/2024
DANU-BSK-D004.1FI	
V4	