

File With _____

SECTION 131 FORM

Appeal NO: ACP-ABP-322154-25Defer Re O/H ☐Having considered the contents of the submission dated/ received 19/12/25
fromIrrelize Stuijs I recommend that section 131 of the Planning and Development Act, 2000
be/not be invoked at this stage for the following reason(s): No new planning issuesE.O.: Daniel O'ConnorDate: 8/1/26

For further consideration by SEO/SAO

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

S.E.O.: _____

Date: _____

S.A.O.: _____

Date: _____

M _____

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

to: _____ Task No: _____

Allow 2/3/4weeks – BP _____

EO: _____

Date: _____

AA: _____

Date: _____

File With _____

CORRESPONDENCE FORM

Appeal No: ~~ACF~~ ABP-322154-25

M _____

Please treat correspondence received on 19/12/25 as follows:

1. Update database with new agent for Applicant/Appellant _____

2. Acknowledge with BP233. Keep copy of Commission's Letter ☐

1. RETURN TO SENDER with BP _____

2. Keep Envelope: ☐3. Keep Copy of Commission's letter ☐

Amendments/Comments

Ingelise Stuyts's response to
S131 notice

4. Attach to file

(a) R/S ☐(d) Screening ☐(b) GIS Processing ☐(e) Inspectorate ☐(c) Processing ☐RETURN TO EO ☐Re-submit drawer

	Plans Date Stamped ☐
	Date Stamped Filled in ☐
EO: <u>Danier & Lomar</u>	AA: <u>Shirley Connolly</u>
Date: <u>8/1/26</u>	Date: <u>08/01/26</u>

Details

Submitter:

Name	Dr Ingelise Stuijts
Address	Banse, Kilmanagh, County Kilkenny, R95V9F6
Note	Attached Appendix 1 (14 pages)

In relation to application

ACP Reference	322154-25
KCC Planning File	256003
Name	Briskalagh Ltd.
Address	In the townlands of Acragar, Ballyconra, Ballycuddihy, Ballyroe, Ballyroe (Grace), Ballyroe (Maher), Baunaniska, Boherkyle, Briskalagh, Brittas, Clone, Coolnapisha, Curraghduff, Freshford, Freshford Lots, Graigueswood, Grange, Huntstown, Kilmanagh, Knockeenglass, Knockown, Moatpark, Monabrika, Monavadaroe, Moneenaun, Oldtown, Oldtownhill, Parksgrove, Picketstown, Rathealy, Sart, Sweethill, Tobernapeastia, Tullaroan, Upperwood Demesne, Co. Kilkenny.

AN COIMISIÚN PLEANÁLA	
LDG-	_____
ACP-	_____
19 DEC 2025	
Fee: €	_____ Type: _____
Time: 9.48	By: <i>Hend</i>

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ACP
19 OCT 1951
For C
Thom

Subject: An Coimisiún Pleanála Reference 322154-25

KCC Planning Application Ref. 2560003

To: An Coimisiún Pleanála

Dear Inspector,

I make this observation as a party to the First Party Grounds of Appeal (GOA) submitted by Briskalagh Ltd, in response to the Further Information provided in respect of the proposed wind farm development within the Kilmanagh, Ballycallan, and Tullaroan communities.

This submission reiterates serious and well-founded concerns regarding residential amenity, the inadequacy of the Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS), and failures in stakeholder engagement.

My opposition to the Briskalagh Wind Farm is rooted in deep concern over how this specific proposal has been handled, both in terms of its excessive scale and the lack of transparency and engagement throughout the process.

Kilkenny County Council (KCC) conducted a comprehensive review of the planning application and have found *"there are a number of significant deficiencies in the quality and quantum of data provided, particularly in the areas of landscape and visual effects, material assets, noise, ecology and hydrology. Furthermore, insufficient detail has been provided on the matter of cumulative effects, especially in regards to the likely effect on the residential amenity of the immediately adjacent residential areas."*

The EIAR was found not meet the statutory EIA requirements in relation to fourteen sections contained therein.

Having considered the applicant's First Party Grounds of Appeal and the subsequent response to Further Information (FI) submitted to An Coimisiún Pleanála, including the updated bat surveys and hydraulic modelling, my position remains unchanged. The Briskalagh proposal is inappropriately scaled, poorly sited, and procedurally flawed. The proposed development is located within an area that is already making a substantial contribution to national renewable energy targets.

Furthermore, the FI responses fail to address the serious deficiencies identified by local residents, independent experts, Kilkenny County Council, and CAAS.

"The cumulative effects of the proposed development will impose an unreasonable and disproportionate environmental loading on the character of a rural area with a locally concentrated population due principally to the combined effect of potential visibility and noise, as well as flicker and disruption of material assets, especially roads, during a prolonged period."

"While proximities between individual turbines and individual dwellings appear to fall at, or close to, minimum standards, the cumulative effects will, arguably, exceed the threshold of what a community can be reasonably expected to tolerate for the overall residential amenity of the community. Guidelines and precedence do not offer reliable relevant thresholds for cumulative effects such as will occur." **Kilkenny County Council Planning Report, Appendix 3, CAAS Ltd, Environmental Impact Assessment Review Page 55.**

Issues which have not been resolved through the FI response

1. Human health and residential amenity: The proposal presents an unacceptable risk to nearby residents arising from operational noise (including low-frequency noise and infrasound), shadow flicker, construction disturbance, and the close proximity of 185-metre turbines to two villages and approximately 218 homes within a 2 km radius. These impacts also give rise to legitimate concerns regarding adverse effects on residential amenity and property values.
2. Inadequate assessment of cumulative effects: There is a clear failure to properly evaluate the combined impacts of this proposed development and other wind farm developments in the area, particularly in relation to human health, landscape character, noise, ecology, and the cumulative burden on the local area. The communities of Kilmanagh, Ballycallan and Tullaroan have accommodated several wind farms including Foyle, An Cnoc, Ballybay, Farranrory.
3. Risks to water resources and flooding: The development poses a significant threat to a sensitive aquifer, local group water schemes, and the already flood-prone village of Kilmanagh. The new Fluvio R&D Ltd report contains significant and concerning errors.
4. Deficiencies in environmental assessment: The EIAR and NIS are fundamentally inadequate, with serious shortcomings in baseline data, cumulative assessment, hydrology, ecology, noise, landscape and visual impact, and human health. These deficiencies have been independently identified and confirmed by CAAS.
5. There remain ongoing failures to protect biodiversity and comply with Appropriate Assessment requirements.
6. Landscape and visual impacts: The visual impact assessment understates the worst-case effects, especially from the most affected homes and from the communities of Kilmanagh, Ballycallan, and Tullaroan.
7. Traffic, haul routes and construction impacts: The proposed construction phase would impose a disproportionate and unreasonable burden on the local community, with serious traffic and road safety implications. Of particular concern are risks to children and school users arising from haul routes and construction compounds located close to Kilmanagh village centre.
8. Corporate structure and accountability: Serious concerns remain in relation to the applicant's limited structure, offshore ownership arrangements, and similarities with other wind farm developments that have experienced significant compliance issues.
9. Planning policy compliance and site suitability: The site is not identified as suitable for large-scale wind energy development under the operative Wind Energy Strategy (Figure 10.2 of the Kilkenny City and County Development Plan 2014–2020). As such, the proposal represents a material contravention of both local and national planning policy objectives.
10. Community engagement and Aarhus Convention concerns: The developer has consistently failed to engage in a meaningful and transparent manner with the affected communities of Kilmanagh, Ballycallan and Tullaroan. This includes repeated errors in identifying sensitive receptors and the provision of inconsistent, poor-quality information over time, contrary to the principles and my rights as a resident of this community under the Aarhus Convention.

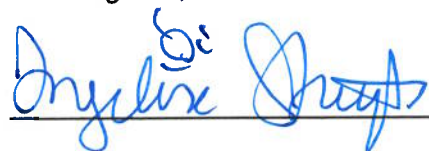
In light of all of the above, my view remains that the developer's appeal, the Further Information, and the updated technical reports largely restate the original position and fail to resolve the substantive issues, which are incapable of remediation.

As per **Kilkenny County Council's Planning Report, page 73**

"there is evidence that the proposed development by reason of its size and scale will give rise to excessive levels of adverse effects on residential amenity due to the cumulative effects of visual intrusion, combined with noise, flicker and disturbance of access on many nearby dwellings in and around the settlements of Tullaroan, Kilmanagh, and Ballycallan. These effects are integral and incapable of being mitigated because they arise from the extent and scale of the proposed works and their proximity and position relative to dwellings."

The FI response does not alter these facts.

Kind regards,

_____

Dated 17-12-2025

Name	Dr Ingelise Stuijts
Address	Banse, Kilmanagh, Co. Kilkenny, R95V9F6
Telephone No./ Note	086-4090050 Appendix 1, 11 pages

In relation to application

An Bord Pleanála Planning Reference	ABP-322154-25 (or PL10.322154)
KCC Planning File	25/6003
Name	Briskalagh Ltd.
Address	In the townlands of Acragar, Ballyconra, Ballycuddihy, Ballyroe, Ballyroe (Grace), Ballyroe (Maher), Baunaniska, Boherkyle, Briskalagh, Brittas, Clone, Coolnapisha, Curraghduff, Freshford, Freshford Lots, Graigueswood, Grange, Huntstown, Kilmanagh, Knockeenglass, Knockown, Moatpark, Monabrika, Monavadaroe, Moneenaun, Oldtown, Oldtownhill, Parksgrove, Picketstown, Rathealy, Sart, Sweethill, Tobernapeastia, Tullaroan, Upperwood Demesne, Co. Kilkenny.

18 December 2025,

To An Coimisiún Pleanála,
64 Marlborough Street, Dublin 1
D01 V902

Dear Inspector,

I wish to reiterate my concerns relating to the proposed Briskalagh Wind Energy Development near Kilmanagh, Co. Kilkenny, as put forward in my letter to ABP, dated 21-04-2025 and the attached letter to ACP dated 17-12-2025.

Firstly, I note that my submission was not registered in Table 6 (Page 60), but was probably included under the 'Community Submission Template'.

I disagree with this approach, as using similar headings and agreeing to expert reviews does not reflect many other concerns I alluded to, which refer to my personal situation and views.

I note that several points from my submission were not mentioned, and thus remain an issue for me. These should have been addressed.

My main concerns remain the following:

General:

- a) Visual impact.
- b) Impact on and danger for (drinking) water including private wells.
- c) Impact of flooding risk from Kilmanagh village to the South, including Killaloe and Callan (see Review Hydro-G dd.18-12-2025, and see further below).
- d) My personal health, including noise, infrasound and shadow flicker.
- e) Cumulative effect of the planned Briskalagh turbines so close to my home (ca 870 m away), in addition to the **six** number of wind farms already active or permitted in the cumulative study area around Kilmanagh and Tullaroan (8.1.1.3 page 116 Revised NIS).
- f) Property prices: the developer dismisses impact of the proposed wind farm on property prices in the long term however, it should be clear that nowhere in Ireland a wind farm is proposed so close to a village and of this intrusive height, and surrounded by so many more existing and planned turbines.
- g) Mobile phone/Internet reception, this point was equally **not addressed**. The reality in Ireland is, that residents living near wind farms do experience phone reception issues and probably also radio reception issues. I note that we locally also regularly experience disruptions to our electrical supply due to storms and other reasons, relying on battery radio for information.
- h) Negative effects on my land use, which is rented out to a person who uses it for his horses, were **not addressed**.
- i) Traffic disruptions and safety concerns for a prolonged period (**up to two years**) during construction in my living area are dismissed.
- j) Wider traffic implications from works on the grid and haul routes which will affect a period of up to **two years**. In my view this essentially blocks any normal travel possibilities in a wide area between Kilmanagh/Tullaroan/Ballycallan and Tullaroan to Freshford to Ballyragget and further between Tullaroan to Kilkenny and Kilmanagh and Ballycallan to Kilkenny, creating road blocks and increased (heavy) traffic which would have to be negotiated by locals and visitors (and plant traffic) alike every day of the week. This is separate from any roadworks that would be needed to repair/strengthen roads and verges during this period.
- k) An important point **not addressed** is how turbine delivery would affect the electricity provision for Kilmanagh village and beyond. The Revised NIS indicates the removal of a length of hedgerow that borders the R695 to the North within Kilmanagh village. But there are many electricity poles on the main street on this side connecting houses, pub, shop/post office and farm, and street lanterns which most likely will be in the way. Will we get serious electricity disruptions locally as a result beforehand too?

- l) The electricity provision to the planned spoil management area/construction compound 700m from Kilmanagh village is equally **not discussed**.
- m) Is this compound intended to remain in some form? I note the current absence of the electricity supply (see point above). Is the area going to be (flood)ighted at night, disrupting the night sky of the village?
- n) I am particularly concerned to see this planned construction compound/welfare/spoil management area so close to Kilmanagh village, I consider this intrusive for the living quality of the local inhabitants including myself, as construction works would go on for up till two years. Sound travels far in this rural setting, and work will go on for six days of the week.
- o) Moreover, as the planned construction compound/welfare/spoil management is planned in an area which would only be receiving delivery of concrete for turbine bases and turbines themselves, it makes no sense *environmentally-wise* to have spoil heaps etc. in this area rather than closer to the main entrance/exit in the North of the planned Wind Farm area and the main turbine area. Refuelling, traffic, crossing of streams and rivers including (temporary) bridges will all bring *unnecessary* negative impacts from noise, dust, vibration, earthworks, and poses *unnecessary* risks and danger to river and streams and floodplain, and also *unnecessary* travel. Moreover, this increased traffic will likely have an influence on the subsoils, porosity etc. hence influence water drainage and influence possible flooding (Report Hydro-G dd. 18-12-2025).

Information requested by An Coimisiún Pleanála in their letter to MKO dd. 06-10-2025

Biodiversity

Point 5 *you are requested to submit an indicative landscape plan and section diagram for the proposed riparian buffer along the Tullaroan Stream..... This plan shall provide details of the proposed planting and protective fencing (if required).*

The response 2.1.5.1 on page 13 refers to Appendix 2 for an indicative landscape plan and section diagram for the proposed riparian buffer.

Appendix 2, Figure 230502-78FI Proposed Riparian Planting presents a generic list of names (with typos), identical to the list presented in previous documents. Oak is not suggested, though this tree species is known to be present in the area.

It also does not indicate whether trees from Irish genetic stock would be used.

This is not answering the question of ACP.

Moreover, concerns remain about the implementation and control of the riparian planting and hedgerow improvement, and the way the Tullaroan/Kilmanagh River can be monitored by the Inland Fisheries. An issue that also was highlighted by reviewer Roger Goodwillie in his letter of January 2025.

Point 8 mentions updated guidelines DHLGH for derogation process for protected species such as bats and that a survey of trees required for removal might be required.

MKO responds on page 18 of the RFIR 2.1.8.1, that 83 trees - which need to be removed - were inspected. The majority was identified as ash. No other tree species are mentioned. **What were the other tree species, that need to be removed? How many are ash trees, how many are other tree species?**

MKO previously in their reports noted there are mature oaks (*Quercus robur*) that would need to be removed.

In addition – **in contrast to previous observations** – no tree at all now seems to be suitable (*for bats*) and/or are dead.

Point 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.*

MKO answers in their RFIR document on page 26 section 2.1.10.1. MKO dismisses this request as there are enough habitats in the area where any amphibians or reptiles can move to.

This was not the question of ACP.

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

The response of MKO in 2.1.11 refers to drawing DANU-BSK-D004.1F1, Appendix 2.

This drawing does not give any restoration plan just a general drawing of the proposed borrow pit and its dimensions, and the suggestion for it to be backfilled with suitable layers of spoil material.

Thus, the request is not answered as there is no restoration plan, just a filling plan (*with what sort of material, what is deemed suitable?*) topped with a topsoil layer to be reseeded (*with what plants, grass, trees, shrubs? Is this area to be grazed?*).

Some remarks on the Revised documents accompanying the RFIR

Archaeology and Heritage

Archaeology and Heritage, I am disappointed that the possibility for non-intrusive geophysical and other surveys for the wider area was disregarded and not further addressed, apart from the historic bridges. Considering the fact, that the whole rural landscape area of Briskalagh will be forever changed into an industrial area, and has potential for many historical and archaeological remains, esp. considering its location on both sides of a river, a more thorough approach in any preparation stage would be preferred.

Appendix 2, Amended figures and drawings

230502 -52FI standard 33kV Clear Span Watercourse Crossing

This is the proposed crossing near T7 and location of a former fish weir. In contrast to other drawings, where proposals are given, no specifics are presented. This is just a generic standard clear span crossing with a temporary bridge added to the North. "Dimensions to be decided upon construction" leaves much uncertainty, noting for example different depth of supports into the underground, giving rise to concerns.

230402-51 detail B1: this is presented as a typical culvert crossing a stream again, no specifics are given. One must wait until construction occurs, and see?

Appendix 3 Revised Natura Impact Statement

General

The developer was asked to highlight deleted or amended text with red strike-through or green text. This has not consistently been done. Here are a few examples:

3.3.1.5 Bird Surveys, Page 10, 3rd paragraph, line 1

The results of the bird surveys, relevant to this Appropriate Assessment, are discussed in Section 3.5.4 of this report.

This was originally "Section 3.2.5 of this NIS", this is not indication with red strike through/green colour

3.4.2 Proposed Grid Connection, Page 12, 6th bullet point, first line

A new proposed crossing under the Nore River, via horizontal directional drilling (HDD)

This was previously “via directional drilling”, not indicated with red strike through/green colour

3.5.1 Description of Habitats within the Site, Page 13, 3rd Paragraph, 2nd line

The habitats recorded along the Proposed Grid Connection underground cabling route are detailed in Section 3.5.1.2.

This was previously “Section 3.2.1.2”, not indicated red strike through/green colour

3.5.4 Kingfisher Surveys, Page 37-38 and page 83

New paragraph 4 is almost identical to the one mentioned on page 83 for River Nore SCA, describing identical “suitable locations” for both Tullaroan Stream or River Nore settings, but this paragraph clearly focuses on Tullaroan River/Killaloe. It may be cut and pasted and thereby some typos occurred.

7e Line A (second) section of suitable nesting habitat was recorded approximately 85m upstream of the proposed crossing location.

The word *second* is missing on page 38, whereas it is present in the identical text on page 83.

Page 47, 4th column first paragraph 6th line after ...works within the SPA boundary

Section omitted re. kingfisher but not indicated as such.

Biodiversity, botany

Reviewer Roger Goodwillie, 50 years practising ecologist and BSBI County Recorder for Kilkenny, in his report of January 2025) indicated that

“The knowledge of species shown by the botanical report is poor and the overall lack of awareness of botanical information is concerning.Three mistakes in a section, probably made by an over-reliance on Google for identification, make one wonder if the information that is given there or elsewhere can be trusted. “

MKO has not directly responded to his observations, but has amended identifications, that Goodwillie highlighted. It is unclear in how far these were just administrative corrections or whether this was done after further field studies to ground truth the original identifications

Page 79 Appendix 3 section 5.1.1.3.2, European Habitat Petrifying with Tufa Formation (7220)

Using the NPWS 2025 guide, MKO concludes that the nearest known record for this QI habitat is found in excess of 20km from this site.

However, this must be corrected, as a study from 2021 in Ballykeeffe Amphitheatre, that includes a biodiversity assessment by Deborah D'Arcy, concludes that this habitat is in effect present in Ballykeeffe, **ca. 3 km** from Kilmanagh. Several moss species are found here that are indicators of calcareous conditions and three moss species marked with an asterisk are indicator species for the EU Habitats Directive priority Annex I habitat Petrifying with Tufa Formation (7220).

Elaboration on value of certain habitats/species

There is no further elaboration/appreciation on the value of some areas and trees, including mature oak and poplar and presence of cherry in hedgerows, and some species-rich ground flora vegetation including orchids. No indication of locations is given, apart from general, near the river, in the west of the Wind farm area or underneath a photograph, in hedgerow.

Poplar (*Populus nigra*)

There is mention of a poplar (*Populus nigra*) tree in previous biodiversity sections, where otter traces were investigated near the Kilmanagh/Tullaroan stream (Vol 1 Chapter 6.6.4.2 Otter page 61 *Tree species Salix spp. and black poplar (Populus nigra) were recorded by the riverbanks in the Proposed Wind Farm.*).

This observation is further ignored. In its response to a previous question about this tree, MKO responded that this tree species is not located within the footprint of the wind farm. However, the relevant section mentions specifically that poplar was present within the wind farm, near the water stream (see above). If this was a correct identification. As native *Populus nigra* trees are rare occurrences, this would warrant further studies and/or confirmation.

3.5.1.1.5. Cherry tree

In one of the photographs Plate 3-11, a cherry tree is indicated in a hedgerow (WL1). This tree species is not further discussed or if this tree would be retained. The tree is not mentioned in the text on page 21 Hedgerow (WL1).

Locations with mature oak (*Quercus robur*)

In same section page 21 (identical to Vol 1 6.6.1.1.5) mention is made of several mature oak found within the footprint of the wind farm, of which some need to be felled. There is no location given for these mature trees apart that they (some? Or all?) are included in hedgerows.

Rich ground flora

Same section mentioned rich ground flora by hedgerow habitat in the west of the Proposed Wind Farm site without further details. With wood anemone, bluebells, ground ivy, barren strawberry, primrose and early-purple orchid.

Biodiversity, birds

While acknowledging that kingfisher has received much attention, there has been no response to other red-listed and amber-listed bird species, raptors as well as affected migratory birds, especially considering the *cumulative* effects of **36** existing/permited/planned turbines all around Kilmanagh/Tullaroan/Slieveardagh Hills in a close setting.

Revised NIS appendix 3 page 116-117 8.1.1.3. cumulative effect with other wind farm developments

Pages 116-117 present numbers of existing/permited wind farms and associated turbine. A total of **6** no. existing/permited wind farms have been identified within the cumulative study area.

The **8 wind turbines** permited from Faranrory mentioned by MKO have now been erected and are dominating the skyline West of Kilmanagh Village. These could start any moment.

The exact numbers of *existing/permited* turbines are given and MKO comes to a total of **23** turbines. However, this is **incorrect**. This should be **29 turbines!**

Including the proposed 7 turbines for Briskalagh, the total turbines surrounding Kilmanagh/my home would be 29 plus 7 is 36 turbines, divided into 7 separate wind farm companies.

Apart from the counting error, the developer does not seem to understand that for the local inhabitants of the area, including myself, the cumulative effect is not only resulting from the construction phase of turbines, but even more from the operational stage of the wind farms, with wind turbines in all directions surrounding our quiet rural area.

Appendix 9 Detailed Site-Specific Hydraulic Modelling – Fluvio R&D Ltd

Location Substation and work/spoil area near Tullaroan/Kilmanagh River

The new information from Fluvio makes me very concerned for the location of the proposed substation and work/spoil area, within the 50m buffer zone along the River to the West, and with streams located to the North and an area that is prone to flooding in the East. Surely, a substation should be located away from a buffer zone and a floodplain should be respected for what it is. (Page 57 Figure 36 and Page 59 Figure 38 flood map)

Flood levels in Kilmanagh (page 50)

We have experienced serious flooding events in Kilmanagh, where the bridge cannot be crossed and water floods the hurling pitch close to the location of existing houses. Further downstream at Killaloe the roads can often be blocked, and in Callan flooding can also present a problem. This report downplays the scale and occasions of these events, and any effect turbines and hardstands as well as ground works could have on the local hydrological situation, let alone any rain events during construction. I refer to the report of Hydro-G from 17-12-2025.

On a personal note: I experienced serious problems in January and February 2016 at home, when my terminally ill husband needed round the clock intensive care and depended on electricity for vital medical instruments and monitoring. On various occasions the carers could not come, as roads and bridge were flooded, leaving me in a desperate situation. This still haunts me to this day.

Crossing/bridge B2

I remain very concerned about the crossing/bridge B2, proposed to facilitate Turbine 07 near the location of a historic fish weir on the narrowest spot of the river. The report from Fluvio recommends further information and planning (Page 31). But Drawing 230502-52-FI revision F101 is a standard bridge without dimensions and scale, presenting a standard clear span structure wider than 20m, and moreover also suggesting a temporary bridge at this location (without details).

Placing of bridges B2 and B3

Bridges B2 and B3 are closely placed, in an area that is not geologically and hydrologically mapped in-depth. Bridge 2 is indicated at 18m wide, whereas B3 would be 4m wide (Table 8). B2 is substantial. Would 4m wide suffice for turbine transport? I am concerned for the carrying capacity of the subsoil in this area, which in effect is a dynamic floodplain.

Uncertainty of area around and South of T07

The new information from Fluvio further indicates the uncertainty of the area around and south of T07. According to Fluvio both T07 (and T08 and T09 which are not proposed), are placed in an area that could experience flooding, and raised height for roads and crossings (i.e. bridges) and turbine grounds are proposed. This could also mean that there is danger for environmental hazards to river/water source during such events.

Fig. 36 gives flood map for the extreme 1000-year flood.....'The main access roads affected are in the vicinity of turbines T7, T8 and T9 where there is significant flooding with relatively high water depth. It is important that the turbine hardstands at these locations should be elevated constructions with ground levels 0.5m higher than the extreme flood level. The access roads to these elevated hardstands should be ramped at a suitable gradient.'

Surely, the FI response has not resolved many issues, including the above mentioned points.

Sincerely,



Dr Ingelise Stuijts

01-12-2025

