

File With _____

SECTION 131 FORM

Appeal NO: ~~ACP~~ App-32254-25Defer Re O/H ☐Having considered the contents of the submission dated/ received 24/11/25
fromIngelese Stuijts I recommend that section 131 of the Planning and Development Act, 2000
be/not be invoked at this stage for the following reason(s): No new planning issuesE.O.: Daniel O'ConnorDate: 25/11/25

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 FORMAppeal No: ~~ACP~~ ASP-322154-25

M _____

Please treat correspondence received on 24/11/25 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: Englise Stuart'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 drawerEO: Daniel O'ConnorPlans Date Stamped ☐Date Stamped Filled in ☐AA: Shirley ConnollyDate: 25/11/25Date: 27/11/25

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

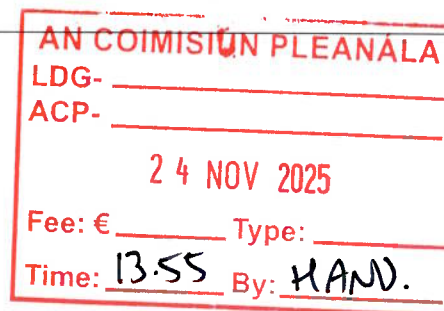
In relation to application

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.

23 November 2025,

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

Dear Sir/Madame,



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.

I have received the RFI and additional text from the developer per registered post. I have not yet been able to go through all documents though, because of the limited time and the number of printed pages. Therefore, this letter serves as a first response to the Further Information before 25th of November, as requested by ACP.

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 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:

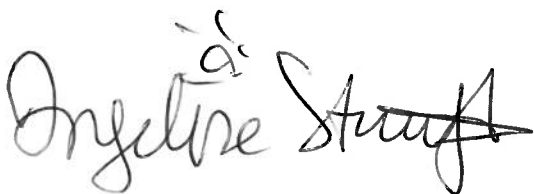
- Visual impact
- Impact on water
- Impact from risk to flooding from Kilmanagh village to the south, including Killaloe and Callan
- My personal health, including noise, infrasound and shadow flicker
- Cumulative effect of the planned Briskalagh turbines so close to my home (ca 870 m away)
- Cumulative effects of **29** existing/permitted turbines, which including Briskalagh would come to **36 turbines** surrounding Kilmanagh
- Negative effects on my land use, which is rented out to a person who uses it for his horses
- Traffic disruptions and safety concerns for a prolonged period (**up to 2 years**) during construction
- Wider traffic implications from works on the grid and haul routes which will again affect a similar period of up to **2 years**. In my view this essentially blocks any normal travel possibilities in a wide area between Kilmanagh/Tullaroan/Ballycallan/Freshford to Ballyragget/and 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
- Biodiversity, while accepting that some plant names were corrected in Appendix 3 of the RFI Submission, 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.
- Biodiversity, riparian planting and hedgerow improvement. Concerns remain about the implementation and control, and the way the Tullaroan/Kilmanagh River can be monitored by the Inland Fisheries.
- Biodiversity, riparian tree species. The list mentioned in Table 3 is a generic list, identical to the Table presented in the original NIS.
- Biodiversity, birds. 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/permitted/planned turbines all around Kilmanagh/ Slieveardagh Hills in a close setting.
- Mobile Phone 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.
- 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.
- Archaeology and Heritage, I am disappointed that the possibility for non-intrusive geophysical and other surveys for the wider area was disregarded. Considering the fact, that this whole rural landscape 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.

- 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)
- I am very concerned to have a construction compound/welfare/spoil management area about 700m from 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 2 years. Sound travels far in this rural setting, and work will go on for 6 days of the week. Moreover, as this is in the section 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. Refuelling, traffic, crossing of water and bridges will all bring unnecessary negative impacts from noise, dust, vibration, earthworks, danger to river and unnecessary travel.
- 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. But Drawing 230502-52-F1 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).
- Bridges B2 and B3 are closely placed, in an area that is not geologically and hydrologically mapped in-depth.
- The new information from Fluvio also highlights 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 05m higher than the extreme flood level. The access roads to these elevated hardstands should be ramped at a suitable gradient.'

I hope my submission will be taken into account by ACP.

Sincerely,



Dr Ingelise Stuijts