

File With _____

SECTION 131 FORM

Appeal NO: ~~ACP~~ ABP-32284-25Defer Re O/H ☐Having considered the contents of the submission dated/ received 22/12/25
fromEdward Fennelly I recommend that section 131 of the Planning and Development Act, 2000
be not 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 2/3/4 weeks – BP _____

EO: _____

Date: _____

AA: _____

Date: _____

File With _____

CORRESPONDENCE FORM

Appeal No: ACP AP-322154-25

M _____

Please treat correspondence received on 22/12/25 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 Edward Fennelly's response to
S131 notice

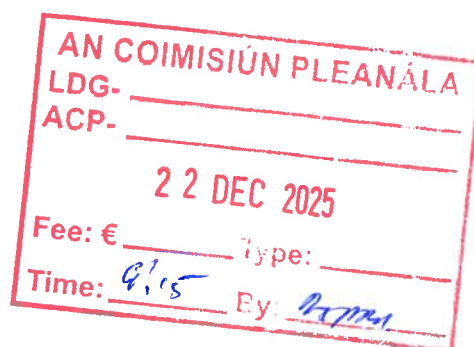
4. Attach to file

(a) R/S ☐(b) GIS Processing ☐(c) Processing ☐(d) Screening ☐(e) Inspectorate ☐RETURN TO EO ☐EO: Daniel O'ConnorDate: 8/1/25Plans Date Stamped ☐Date Stamped Filled in ☐AA: Shirley ConnollyDate: 08/01/26

Oldtown
Kilmanagh
Co Kilkenny
R95 XE10

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

Date: 18th December 2025



Re: Case Number: ABP-322154-25

Planning Authority Ref No. 2560003

The development which will consist of the provision of 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.

Re: Briskalagh Wind Farm – Planning Authority Ref. No. 2560003

Dear Sir or Madam,

I wish to lodge an observation and objection to the Response to Further Information (RFI) submitted by MKO on behalf of Briskalagh Ltd. in response to the Further Information Request issued by An Coimisiún Pleanála (ACP Ref. 322154-25).

The principal ground of this submission is that the RFI fails to adequately assess reasonable alternatives for the proposed grid connection and, as a result, does not demonstrate how impacts on the local communities in Tullaroan and Freshford, road network, traffic including operating safely at schools can be mitigated.

The assessment of reasonable alternatives is a mandatory requirement of the Environmental Impact Assessment process under Directive 2011/92/EU (as amended by Directive 2014/52/EU) and as transposed into Irish planning law. EPA Guidelines (2022) clearly require an EIAR to describe reasonable alternatives considered and the reasons for selecting the preferred option, including a comparison of environmental effects. This has not been adequately addressed.

While Section 2.7.1.1 of the RFI identifies three alternative grid routes, the applicant has failed to consider a reasonable and clearly available alternative: connection via the permitted Farranrory Wind Farm substation and its 110kV grid connection to Ballyragget substation. Farranrory Wind Farm is located approximately 6.5km west of the subject site and is



currently under construction and is very close to my home place in Ballingarry, Co Tipperary. I understand that the Farranrory grid connection to Ballyragget will be operated by ESB or EirGrid. It should be properly assessed to see if there would be additional capacity in this cable to connect the proposed Briskalagh project.

Use of this existing connection would significantly reduce route length, construction impacts, and environmental effects. It would also remove the need for additional drilling beneath the River Nore at Ballyragget, thereby substantially reducing risk to this designated site. The failure to assess this option represents a serious omission and has not been remedied by the RFI.

The Tullaroan community has already experienced severe disruption from the Farranrory grid connection works. The proposed Briskalagh grid connection overlaps some sections of the same road network, meaning prolonged and cumulative disruption to local residents, businesses and road users and has not been adequately addressed.

An Coimisiún Pleanála specifically raised concerns regarding proposed full road closures along an 8.1km stretch of the R694 for up to 81 days. The applicant has failed to demonstrate that these closures can be avoided or minimised, or that diversion routes can safely accommodate additional commercial traffic including milk lorries drawing milk to Tirlan Creamery in Ballyragget. Crucially, I cannot see if a proper assessment has been made as to whether local roads can physically accommodate a second cable duct alongside the existing Farranrory infrastructure, nor of the environmental impacts should this prove unfeasible. The EIAR and RFI also fail to account for existing services (e.g. water, fibre, sewerage (e.g. Tullaroan sewerage system goes through the village in multiple directions) within these roads, which will further complicate and prolong works.

Overall, the applicant has failed to properly consider reasonable alternatives, to assess cumulative impacts, or to adequately address the significant and long-term effects on the local communities near the wind farm and along the proposed grid route. Construction traffic, extensive road works along approximately 23km of rural roads will have substantial negative impacts. These impacts are not adequately assessed or mitigated in the EIAR or RFI.

In conclusion, the applicant has not demonstrated that the proposed Briskalagh Wind Farm development will not cause significant adverse impacts, that the site and grid route are suitable, and that appropriate mitigating solutions are put forward that can adequately and sufficiently address the negative impact of the proposed grid connection to Ballyragget in particular to schools, local businesses (e.g. farming, transportation, milk and feed lorries). I therefore respectfully request that An Coimisiún Pleanála refuse permission for the proposed development.'

Your faithfully,

Edward Fennelly

