

Dáire Littleton Caden

From: Elaine O'Reilly <elaine.oreilly@kilkennycoco.ie>
Sent: Dé Céadaoin 23 Aibreán 2025 14:51
To: Appeals2
Subject: ABP-322154-25 (2560003)
Attachments: PA Response to appeal ABP 322154 25.pdf

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Hello,

Please find attached the Kilkenny County Council Planning Authority comments relating to the above appeal.

Kind Regards,

Elaine

Planning Section



Comhairle Chontae Chill Chainnigh

Halla an Chontae Sraid Eoin Cill Chainnigh
R95 A39T

Foras Águs Ailseana i nGairneoireacht & Eitheadh

Kilkenny County Council

County Hall John Street Kilkenny
R95 A39T



Creidimh Suidh i nGairneoireacht & Eitheadh

To: An Bord Pleanála
appeals@pleanala.ie

23/04/2025

Re: ABP-322154-25 (2560003)

Permission 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 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, Picketstown, Rathealy, Sart, Sweethill, Tobernapeastia, Tullaroan, Upperwood Demesne, Co. Kilkenny.

A Chara,

In relation to the above appeal Kilkenny County Council refers to the planning report and associated appendices prepared in the assessment of application ref. P.25/60003.

Additional points for consideration of An Bord Pleanála are set out as follows:

MKO document "First Party Grounds of Appeal", page 18, states:

This text cited above from within Refusal Reason 1 relates to cumulative landscape and visual interactions with other wind energy development, and not the in combination interactions of effects related to visual intrusions, noise, shadow flicker and road access on residential amenity, which is addressed above.

This assertion is incorrect. Kilkenny County Council considers that the cumulative effects of the proposed development on its own will impose an unreasonable and disproportionate environmental loading on the character of this 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.

On a second point, it is noted that section 4.1.1.3 of the MKO appeal document states "As well as being a landscape of Low sensitivity, the Proposed Wind Farm is sited in an area of the landscape mapped as both 'Acceptable in Principle' and 'Open to Consideration' in local planning policy"; however, Figure 11.4 'Wind Strategy Areas' of the current development plan have not come into effect following a ministerial direction.

Conservation

The MKO appeal document from MKO 4.1.13 makes little or no reference to the ACO comments concerning the historic bridge, and crossing of same. The ACO report dated 21st February 2025 states as follows:

There are a number of bridge crossings also, i.e., Britta's cross roads, and bridge NIAH 12400902, while there are a number of bridges that are visible on the OSi historic maps

which are also in the PDS. Protected structures C886, C89, and Freshford ACA, are also with the PDS.

Proposals submitted to cross bridges which are on the PRS, NIAH or which are historic masonry bridges (but maybe not included in either the RPS or the NIAH) include insertion of an underground cable laid in a flatbed formation within the public road over the bridge deck and also options for underground directional drilling.

Works to the carriageway of a bridge may be problematic for the following reasons:

- Insufficient road depth to accommodate the new cables*
- Road build up results in requirements to heighten parapets, negatively impacts the character of these bridges while potentially weakens masonry elements when excavating.*
- Significant rubbing strips / kerbing negatively impacts the character of these bridges*
- Attaching hardware directly the facade of the bridge negatively impacts character while potentially weakens masonry elements*

Section 9.3.7 Bridges of the Kilkenny City and County Development Plan 2021-2027 states:

There are many 18th and 19th century bridges still in use in the county today. Such structures are constructed from traditional materials of local stone, lime, and sand. They are testament to the durability of local materials and civil engineering at local level, while adding significantly to the architectural heritage of the County.

While section 9.3.7.1, includes Development Management Requirements:

To ensure appropriate materials and methodologies are used for the repair works for Kilkenny's historic bridges.

Section 14.4.3.8 'Features of Local Cultural Heritage Merit' of Environmental Impact Assessment Report Briskalagh Renewable Energy Development Chapter 14, Cultural Heritage, states:

Six bridges (CH3-8) of local cultural heritage merit are located on the Proposed Grid Connection underground cabling route. None of the bridges, which comprise stone road bridges, are named on the historic mapping. The proposed crossing methodologies are outlined in Chapter 4, Section 4.8.2.8 of this EIAR.

Appendix 4-1 contains crossing methods for the hardware installations of bridges. Where bridges are historic, it is recommended that they are kept free from hardware connected with the project, and directional drilling be undertaken. Where historic bridges are to be crossed, directional drilling under masonry bridge is the recommended approach.

- Bridge 13 - The submitted proposal is for installation in the road make up. Directional drilling under historic masonry bridge is a more appropriate approach.
- Bridge 12 – The submitted proposal is for in the road make up. Directional drilling under historic masonry bridge is a more appropriate approach.
- Bridge Brittas Cross Roads - nothing proposed but it is an early masonry bridge – directional drilling required – this should be detailed by way of a further information request.
- Bridge 11 – The submitted proposal is for in the road make up. Directional drilling under historic masonry bridge is a more appropriate approach.
- Bridge 8 – Directional drilling under masonry bridge is the recommended approach.
- Bridge 7 – The submitted proposal is for in the road make up. Directional drilling under historic masonry bridge is a more appropriate approach.
- Bridge 6 – Directional drilling under masonry bridge is the recommended approach.
- Bridge 5 – The submitted proposal is for in the road make up. Directional drilling under historic masonry bridge is a more appropriate approach.