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Catherine Flynn

From: Elaine O'Reilly <elaine.oreilly@kilkennycoco.ie>
Sent: Tuesday 6 May 2025 16:06
To: Appeals2
Subject: ABP-322225-25 (2460210)
Attachments: PA Response to Appeal.pdf

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Hello,

Please find attached the Kilkenny 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

Pobail agus Áiteanna Inbhuanaíthe a Chruthú

Kilkenny County Council

County Hall John Street Kilkenny
R95 A39T



Creating Sustainable Communities and Places

TO: An Bord Pleanála
appeals@pleanala.ie

06/05/2025

Re: ABP-322225-24 (24/60210)

Permission for development. The development will consist of: (i) All works (within County Kilkenny) associated with the connection of the proposed Seskin Wind Farm to the national electricity grid, via underground 38kV electrical cabling within the public road corridor to the existing Kilkenny 110kV substation; (ii) Provision of 16 no. joint bays, communication chambers and earth sheath links along the underground electrical cabling route; (iii) Reinstatement of the road and track surfaces above cabling trench along existing roads and tracks; (iv) Carriageway strengthening works at 'Black Bridge' on the L1835 / L3037 (Protected Structure RPS Ref. D84); (v) A new temporary access road off the N78 to the L30372 in the townlands of Cloneen, Co. Kilkenny to facilitate the delivery of turbine components and other abnormal loads; (vi) All ancillary apparatus and site development works above and below ground at Kilmagar, Clara Upper, Mountnugent upper, Mountnugent lower, Ossoryhill, Feathallagh Churchclara, Rathgarvan or Clifden, Clarabricken, Coolgreany, Coolcullen, Reevanagh, Scart, Highrath, Ballysallagh, Ballynamona, Coan East and Cloneen, Co. Kilkenny.

A Chara,

In relation to the first party appeal to the above referenced planning application, An Bord Pleanála are advised that the main areas of concern relate to the grid connection route selection process and the potential significant impacts in particular on the road infrastructure itself and its carrying capacity, and the potential impacts on the receiving environment and on the residential amenities as a result of the proposed grid connection works. This is summed up in the recommendation of the Planning Authority which states:

Having regards to the decision of Carlow County Council to refuse planning permission for Seskin Windfarm (P24/60122) which is a fundamental component of the proposed grid connection development, and the lack of a plan led strategy for the connection of multiple private developments to the national grid network, it is considered that the proposed grid connection is premature pending an overall grid connection strategy which would provide guidance in relation to such matters as the capacity of the road network and the impacts of the associated grid connection works on the environment, traffic safety, public amenity and the public road network itself.

In addition, it is considered that the applicant has failed to adequately address the potential impacts of the proposed grid connection in particular, the lack of alternative grid connection routes assessed such as overhead cables and connection via third party lands, to ensure that the optimal route has been selected which would not have a detrimental impact on the environment, the public road network or local amenity. There is no consideration given to the effect of the ducting of cables under a public roadway on the carrying capacity of the roadway for other services, including potential demand from other energy projects. The significant environmental effects, including effects on material assets, noise, hydrology, biodiversity, amenity, nuisance and cumulative effects, the lack of information on alternative grid connection routes and comparison of their environmental effects have not been adequately addressed in the submitted EIAR.

In addition to the above summary, the following assessment is set out in the Planner's report. **During the assessment of this planning application, an updated Preliminary Route Development report was submitted at further information stage. It notes that initially four preliminary routes were identified from a desktop analysis. Two routes are directed toward the Carlow 110Kv substation with the remaining two towards the Kilkenny 110Kv substation. With the exception of a short section of ducting located in private land to avoid the Milford Weir on option 2, these are predominately located within the public road with the fourth option included a section (5.3km) of over-head line (OHL).**

The applicant notes that *When assessing potential grid connection routes, ESBN Specification No. 18149 (General Specification for Contestably Built Underground Networks) was followed where possible in relation to property ownership along the proposed grid connection route. It is the policy of ESB Networks to install underground cables in property which is in public ownership or is in the charge of the local government authority. The route of the underground power cable shall not be on private property insofar as this is physically possible.*

It would appear that this policy requirement influenced the selection of routes as there is no assessment of grid connection options substantially or entirely as OHL or underground within third party lands. A full assessment of alternatives has therefore not been carried out.

The referral report received from Kilkenny County Council's Roads Department states that following:

It is noted that under section 5.0 of ESBN Specification No. 18149 (General Specification for Contestably Built Underground Networks), that the proposed design shall be submitted for review by ESB Networks at the following project stages:

- *Route selection and survey (before planning submission)*
- *Route risk assessment*
- *Material selection*
- *Detailed Design*

Having regards to planned grid connection infrastructure and other potential windfarm/solar/energy schemes in the area, there is concern that there will be separate ducting runs for each operation which will severely limit the public road capacity and the Local Authority's ability to carry out its functions in respect to maintenance works and future services provision. There is significant merit in rationalising the ducting and grid connection infrastructure to cater for all the different parties/developments. In particular, the crossing of culverts structures and the ducting in the R712 should be rationalised. The applicant has identified that the proposed grid connection route will utilise the same route corridor over a portion of the grid connection route as other proposed grid connections either in development or planning stage.

It is unclear if the ESBN design review and detailed analysis was fully undertaken in respect of the route selection and route risk assessment having regard to the changes in availability of existing OHL infrastructure, the limited engagement with TII in respect of the traversing the N10 and R712 for Route Options 1-KK and 2-KK, and the impact of grid connection roadworks in terms of duration and traffic diversion route and impacts on the travelling public raised by third party submissions. Furthermore, the risk of being unable to obtain a Road Opening

Licence due to lack of capacity in the road network due to other potential grid connection installations does not appear to have been fully addressed in this instance.

A revised Traffic Assessment report carried out By Alan Lipscombe, Traffic and Transport Consultant was also submitted in response to a further information request. In relation to road closures/diversions the following is indicated in the report:

- Over the 221 working days that the construction of the Proposed Grid Connection Route will take place, it is estimated that a total of 71,822 trip will be impacted with an average of 325 trips impacted on each of 221 days,*
- For the trips impacted it is forecast each will experience an average increase in trip length of 3.1km and in increase in trip duration of 3m 41 seconds.*

The referral report received from Kilkenny County Council's Roads Dept states:

The applicant has provided additional information in respect of the Traffic and Transport Assessment (TTA). It is noted that this primarily relates to the windfarm project (Proposed Project) and notes that the traffic impacts will generally be confined to the construction period and the impact will be therefore temporary. A link assessment was conducted on the proposed site delivery routes from the N78/ L1834 and from the R448. In respect to the grid connection works, the construction traffic is estimated to comprise 14 return HGV trip and 7 return car trips daily. It is noted that the estimate of the background traffic on the diversion routes for link capacity assessment was based on two junction counts which may not be fully reflective of the background traffic. The submission states that short term diversions are forecast for local traffic although the traffic volumes that will be impacted on the local road are low. By its nature the effects of these additional trips and diversions on the network will be transient, will be temporary and will be light. It is forecast that the additional traffic that will appear on the public road network serving the Proposed Wind Farm site and during the construction of the Proposed Grid Connection Route will have a slight to moderate and temporary negative effect on existing road users, which will be minimised with the implementation of the mitigation measures included in the proposed Traffic Management Plan included as Appendix 15-2.

The traffic volume estimate does not consider any construction traffic accessing the windfarm construction site which does not travel on the indicated site access link roads.

Whilst the information submitted suggests that there is sufficient link capacity for construction generated traffic, the applicant has not carried out a detailed assessment of the affected road infrastructure for both construction haul routes and diversions to demonstrate that the road network has adequate structural and cross-sectional capacity, given the condition of the existing legacy local road network, to cater for the generated construction traffic for the windfarm development and associated grid connection.

The applicant refers to a UK Department of Transport Traffic Advisory Leaflet 2/04 to estimate an appropriate link capacity for the local road network. It should be noted that this document relates to a pilot scheme for rural traffic calming measures including inter alia, cross-section control, passing bays, signage and road-markings. No proposals in respect of these provision have been submitted.

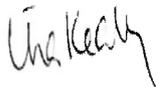
The applicant indicates that traffic volumes will significantly increase on the proposed traffic diversions over extended periods (8-10 weeks for a number of diversions) with an overall time frame of approximately 10-12 months (221 construction days) of consecutive diversions over

the extent of the grid connection. Projected additional vehicle detour distances travelled are estimated at 221,122 kms over this period with detour additional lengths ranging from 1.5 to 7.2 km and increased average trip times of approximately 4 minutes.

The applicant has not provided information regarding the suitability of the roads for traffic diversion in terms of structural capacity and cross-section to cater for diverted traffic for the anticipated closure periods. Proposals for carriageway improvements, road-widening/passing bays, junction improvements, signage and any other relevant traffic management controls have not been provided as requested. The applicant has indicated that this would be done post planning at detailed design/road opening licence stage.

An Bord Pleanála are advised that full details of the issues raised by third parties and statutory consultees are set out in the Planner's report for further review.

Mise le Meas,



Una Kealy
Administrative Officer
Planning Section

