

Our Case Number: ACP-322845-25

Your Reference: North Kildare Wind Farm Limited



An
Coimisiún
Pleanála

Fehily Timoney & Company Consultants
Core House
Pouladuff Road
Ballyphehane
Co. Cork
T12D773

Date: 02 April 2026

Re: Proposed development of 11 wind turbines and ancillary development within the townlands of Ballynamullagh, Kilmurry, Coolree, Killyon, Mulgeeth and Drehid, County Kildare (www.drehidwindfarmSID.ie)

Dear Sir / Madam,

I have been asked by An Coimisiún Pleanála to refer further to the above mentioned proposed development which is before the Commission for consideration.

Please be advised that the Commission, in accordance with section 37F(1)(a) of the Planning and Development Act 2000, as amended, hereby requires you to furnish the following further information in relation to the proposed development:

Biodiversity

- (a) It is fundamental that biodiversity baseline data are fit for purpose, up-to-date and sufficient. Where the lifespan of ecological survey data exceeds the typical validity period as set out in recognised guidelines, the applicant is required to provide up to date information or justification on the sufficiency of the information provided with respect to site condition, species mobility, species population and distribution trends and clearly disclose any limitations in reporting.

Therefore, the following is requested:

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Avifauna

- i. As per NatureScot, 2025 guidelines *Recommended bird survey methods to inform impact assessment of onshore windfarms*, survey data is collected within five years of planned submission, and within three years where bird species populations are rapidly changing. You are requested to review the ornithological assessment particularly with respect to rapidly changing species recorded including Curlew, Lapwing and Golden Plover.
- ii. An Coimisiún Pleanála shares the concerns of the Department of Housing Local Government and Heritage, Development Applications Unit in their submission dated **14th August 2025**, relating to the absence of rationale for the selection of transects for breeding waders. The Commission also has concerns relating to the variability in survey effort during the survey period. Please provide reasoning to support your rationale and to update the breeding bird survey transects to ensure survey effort is compliant with best practice and representative of the diversity of habitats across the site and bird species associated with same.
- iii. An Coimisiún Pleanála shares the concerns of the Department with respect to the adequacy of the barn owl survey. You are required to update the barn owl surveys with respect to best practice guidelines appropriate to wind farm development.
- iv. With respect to the request items i-iii listed above, you are requested to update the planning application documentation including the ornithological impact assessment, collision risk assessment and cumulative effects, as required.

Fauna

- v. An assessment of the status of existing or new features to support mobile species such as otter, badger and bat, is requested to update the planning application documentation and liaison with the NPWS if Regulation 54 derogations are required.
- (b) You are requested to review the bat impact assessment and to reconsider the recommended 90m buffer zones proposed in the Bat Survey (Aughney, 2019), given the high levels of Leisler's bat and pipistrelle bat species recorded across the site and their elevated collision risk; and update the planning application documentation accordingly.

- (c) You are requested to provide further assessment and evidence base on the approach and effectiveness of the proposed mitigation on the use of treelines and hedgerows to divert bats away from turbine locations.
- (d) You are requested to provide an ecohydrological assessment on the potential impacts from the construction turbines T8, T9 and T10 on the hydrological functioning of the proximal Annex I habitat PB1 Raised Bog habitat, specifically Mulgeeth Bog.
- (e) You are requested to provide further information on habitat suitability in the wider environs and landscape connectivity for red squirrel and the likelihood of effectiveness of proposed mitigation to minimise impacts on red squirrel.
- (f) You are requested to review the extent of felling proposals particularly with respect to mature broadleaved vegetation due to the scarcity of such habitat in the wider environs.
- (g) You are requested to review the impact of the amenity trail in the context of cumulative loss of woodland habitat, habitat fragmentation, edge effects, wildlife disturbance and displacement.

Water Framework Directive

It is requested that you provide a standalone Water Framework Directive Compliance Report.

Flood Risk

Turbine 6 is noted to be located in Flood Zones A and B. The *Planning System and Flood Risk Management Guidelines for Planning Authorities* state that development in Zone A should be avoided and/or only considered in exceptional circumstances and where the justification test has been applied. Only water compatible development is considered appropriate. The guidelines state that in Zone B less vulnerable development should only be considered if adequate lands or sites are not available in Zone C and subject to a flood risk assessment.

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You are requested to provide the following:

- (a) supporting detail and evidence as to why it considers that turbines are 'largely considered to be water compatible' having regard to what is defined as 'water compatible' in the guidelines (Table 3.1),
- (b) details of alternative locations/absence of alternative locations with low flood probability within the application site which were considered for the turbine location and reasoning for the chosen turbine location, and,
- (c) what exceptional circumstances arise in the current proposal to justify the location of the turbine in an identified area of flood risk. This should be supported by a justification test in accordance with the details provided in Box 5.1 of the guidelines

Noise

- (a) As per the details provided in Table 7.1.2 in Appendix 7 of the EIAR the noise assessment is based on baseline noise measurements at 5 no. monitoring locations (N1 to N5) that are in excess of 7 years old (at the time of the lodgement of the application to the Commission). The measurements at the other two monitoring locations (N6 and N7) are in excess of 6 years old (at the time of the lodgement).

Please provide up to date baseline noise measurements of the existing environment. Any amendments to the noise assessment including amendments to the EIAR and relevant appendices resulting from the noise measurements should be clearly delineated.

- (b)
 - (i) You are requested to clarify the nature and extent of the noise mitigation measures to be employed at the northern site entrance to protect the properties to the east and west during the construction of the said entrance and access track.
 - (ii) Please clarify and amend, as appropriate, the details provided under the heading 'Adjacent Dwellings' on page 31 of Chapter 13 (Traffic and Transportation) of the EIAR including details of the proposed entrance(s) referred to and proposed mitigation measures.
- (c) You are requested to submit a mitigation strategy for operational Amplitude Modulation and Tonal Noises.

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Sensitive Receptors

You are requested to submit a table setting out the separation distances of the turbines from the nearest sensitive receptors. The sensitive receptors are to be appropriately labelled to allow for comparative analysis of the details provided in Table 7.3.1 of Appendix 7 (noise sensitive location details) and Table A12-1-1 of Appendix 12 (receptors assessed for shadow flicker).

Landscape

You are requested to consider the proposed variation to the Kildare County Development Plan 2023-2029 to replace the Landscape Character Assessment (2004) with the Landscape Character Assessment (2025). The variation comprises of amendments to Chapter 12 Landscape, Recreation and Amenity of the Written Statement (Volume 1), Appendix 2 Wind Energy Strategy and the insertion of a new Appendix 13 Landscape Character Assessment (2025). Any alterations to the EIAR and associated appendices to be clearly delineated.

Mitigation Measures

You are requested to submit a compendium of proposed mitigation measures.

The further information referred to above should be received by the Commission within **6 months** from the date of this notice (i.e. no later than the **1st October 2026**).

In this regard, please submit 3 hard copies and one electronic copy of the above information.

Please note that following its examination of any information lodged in response to this request for additional information, the Commission will then decide whether or not to invoke its powers under section 37F(2) of the Planning and Development Act 2000, as amended, requiring you to publish notice of the furnishing of any additional information and to allow for inspection or purchase of same and the making of further written submissions in relation to same to the Commission.

If you have any queries in relation to the matter, please contact the undersigned officer of the Commission. Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

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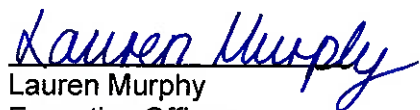
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Yours faithfully,



Lauren Murphy
Executive Officer
Direct Line: 01-8737275

PA11

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