



An Coimisiún Pleanála
Strategic Infrastructure Development Section
64 Marlborough Street
Dublin 1

Our ref: 240740

Your ref:

Date: 10 July 2025

Re: Proposed Slievegrine Renewable Energy Development, County Waterford, Strategic Infrastructure Development (SID) Consultation Request

Dear Sir/Madam,

On behalf of our client, Slievegrine Ltd. (Lissarda Business Park, Lissarda Cork, Ireland), MKO are seeking a determination from An Coimisiún Pleanála in relation to the Strategic Infrastructure Development (SID) status or otherwise in relation to the Slievegrine Renewable Energy Development (the Proposed Project) This request is being made under the provision of Section 37B of the Planning and Development Act 2000, as amended (the Act), as the Proposed Project comprises 24 no. wind turbines, associated hardstands, electrical cabling, site development works, and an onsite 110kV substation and grid connection, with the potential for the wind farm to generate greater than 50 Megawatts (MW) of electricity to the National Grid. This request provides An Coimisiún Pleanála with information relating to the Proposed Project, the prospective applicant, the proposed site location, planning policy context and an assessment of the proposal against the SID legislative thresholds and determination criteria.

Prospective Applicant

The prospective Applicant for the Proposed Project, Slievegrine Ltd., is an associated company of Enerco Energy Ltd., an Irish-owned, Cork-based company with extensive experience in the design, construction and operation of wind energy developments throughout Ireland, with projects currently operating or in construction in Counties Cork, Kerry, Limerick, Clare, Galway, Mayo and Donegal.

By Q2 2025, Enerco associated companies had over 925 Megawatts (MW) of wind generating capacity in commercial operation or in construction, with further c.400MW of projects at various stages in its portfolio to assist in meeting Ireland's renewable energy targets.

Proposed Project

The location of the Proposed Project is included here as **Figure 1: Site Location Context**. The EIAR Site Boundary spans the townlands of Ballyguiry, Carronadavderg, Carronahyla, Carronbeg, Clashbrack, Cloghraun, Drumslogh, Garrynagree, Glen Beg, Glen More, Knocknahoola, Knocknaglogh Upper, Knockatoor, Lackamore, Lyre, Monacullee, Moyng, Pulla, Reamanagh East, Reamanagh West, Reanaviddoge, Toor North, Toor South, Toor and Windgap, County Waterford. Current land-

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use on the subject site comprises primarily of forestry and agriculture. Land-use in the wider landscape comprises a mix of agriculture, low density residential properties and renewable energy developments. The EIAR Site Boundary area extends to approximately 1195 hectares (ha). It should be noted that the EIAR Site Boundary currently only represents the Proposed Wind Farm and does not currently include the grid connection cabling route. The EIAR Site Boundary will be updated to include the grid connection route once the exact route has been chosen.

As noted above, the Proposed Project comprises of 24 no. wind turbines with a maximum ground to blade tip height of 185 metres, associated foundations and hard standing areas, underground electrical cabling, an onsite 110kV substation, meteorological mast, access roads, temporary construction compounds, borrow pit(s), spoil management, and site drainage. It is intended that a design flexibility request will be issued to the Commission once the range of turbine dimensions has been confirmed.

The point of connection of the wind turbines subject of the Proposed Project to the national grid is still under consideration, with the grid connection options below emerging as the most favourable options:

- Connection to the national grid via a new proposed 220kV loop-in substation under the existing 220kV Knockraha-Cullenagh overhead line;
- Underground cabling to the existing Dungarvan 110kV substation, located 6km northeast of the EIAR Site Boundary;
- Underground cabling to the existing Woodhouse 110kV substation, located 4.8km northwest of the EIAR Site Boundary

The above connection points can be viewed in **Figure 2: Grid Connection Points Under Consideration**. The underground cabling will be located within existing private roads / land, and within the public road corridor. An Environmental Impact Assessment Report (EIAR) will be prepared for the Proposed Project which will include an assessment of the grid connection works.

The Proposed Project is being brought forward in response to local, national, regional and European policy regarding Ireland's transition to a low carbon economy and associated climate change policy objectives. The site of the proposed renewable energy development is located within an area designated in the Waterford County Development Plan, 2022-2028 (as varied) as a 'Preferred Area', the most favourable policy level for wind energy (See **Figure 3: Wind Energy Strategy**).

While the turbine technology to be used at the site of the Proposed Development remains under review at this time, the Export Capacity of the Proposed Project will have an output in excess of 50MW. This request to open consultations with An Coimisiún Pleanála in respect of the Proposed Project is therefore being made under Section 37B of the Planning and Development Act 2000, as amended.

Need for Wind Energy Development

There remains an ongoing and critical need to decarbonise the economy and reduce fossil fuel emissions. As highlighted in the Climate Action Plan 2025 (CAP 25), 2023 was the warmest year on record globally, and record breaking-warming has continued in 2024 meaning that the 1.5-degree limit on global warming set by the Paris Climate Agreement looking increasingly likely to be exceeded.

The severity of impacts of climate change across the globe highlights the urgency with which real change is required. CAP 25 makes clear that central to achieving real decarbonisation is new renewable energy projects; *“A renewables-led system is at the core of Ireland’s plan to radically reduce emissions in the electricity sector, protect our energy security, and ensure our economic competitiveness. This requires the accelerated and increased deployment of new renewable electricity generation capacity and related infrastructure”*

The Climate Change Advisory Council (2025), *Annual Review 2025 – Electricity: Summary for All* states that *“To meet the carbon budgets, emissions from the Electricity sector will need to reach zero by the end of the 2030.”*; *“Renewable energy is still not being rolled out fast enough...”*, and key recommendations includes *“The Government should immediately align the legal mandate and strategy for all public bodies to act in conformity with the Climate Act 2021, particularly those operating in the energy sphere, such as An Bord Pleanála, the Maritime Area Regulatory Authority, the Commission for Regulation of Utilities (CRU), EirGrid, ESB Networks and Gas Networks Ireland, and ensure full depreciation of fossil fuel regulatory assets by 2050 as an integral part of the energy transition plan.”*

The National Planning Framework – First Revision (‘Revised NPF’) National Policy Objective 70 directly supports renewable energy:

“Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a climate neutral economy by 2050.”

While the Revised NPF further states, in relation to actions required to reduce greenhouse gas emissions:

“the continued reduction in dependency on imported fossil fuels and decarbonisation of the energy system as a whole and in particular the electricity sector through the identification of targets for renewable electricity and the accelerated roll out of on-shore wind energy and solar development”

At regional level, the Southern Regional Assembly’s Regional Spatial Economic Strategy (RSES) supports an increase in the amount of renewable energy sources in the region, including the provision of wind energy. The RSES supports the provision of the renewable energy in the region; a matter which is clearly set out in Regional Policy Objective (RPO) 99:

“It is an objective to support the sustainable development of renewable wind energy (on shore and offshore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.”

At Local Policy level, the Waterford County Development Plan 2022-2028 came into force on 7th June 2022. The Plan contains development management standards, policies and objectives aimed to inform decision making over the 6-year period. Policy Objective UTL 13 provides support for wind energy: *“It is the policy of Waterford City and County Council to promote and facilitate a culture of adopting energy efficiency/renewable energy technologies and energy conservation and seek to reduce dependency on fossil fuels thereby enhancing the environmental, social and economic benefits to Waterford City and County...”*

- *Supporting the delivery of renewable energy to achieve the targets identified in Table 6.3 of the Development Plan.*

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- *Facilitating and encouraging, where appropriate, proposals for renewable energy generation, transmission and distribution and ancillary support infrastructure facilities including the necessary infrastructure required for the development of offshore renewable energy developments developed fully in accordance with the Waterford Renewable Energy Strategy, the wind energy designation map (Appendix 2 of the RES), the Waterford Landscape and Seascape Character Assessment undertaken to inform this Development Plan, and the National Wind Energy Guidelines, or any subsequent update/review of these...*
- *Promote and encourage the use of renewable energy, and low carbon resources, namely solar photovoltaic, geothermal, heat pumps, district heating, solar thermal, hydro, tidal power, offshore and onshore wind, biomass as well as micro-generation among business, agriculture, education, health, and other sectors.*
- *Promoting, encouraging, ensuring, and facilitating community engagement, participation and implementation of/in renewable energy projects...*
- *To support in conjunction with other relevant agencies, wind energy initiatives, both onshore and offshore, and wave energy, and onshore grid connections and reinforcements to facilitate offshore renewable energy development when these are undertaken in an environmentally acceptable manner.”*

It is therefore held that, subject to full consideration of all matters as part of the planning application and EIAR process, the subject site can meet the clear need to deploy additional wind energy and assist in tackling climate change.

Strategic Infrastructure Development Legislative Thresholds and Determination Criteria

The current SID thresholds for wind energy are set out in the Seventh Schedule of the Act. The relevant threshold established in the Seventh Schedule for the current project is *“An installation for the harnessing of wind power for energy production (a wind farm) with more than 25 turbines or having a total power output greater than 50MW”*. The Proposed Project is anticipated to have a power output well in excess of 50MW and therefore will exceed the generating capacity threshold specified in the Seventh Schedule.

Under Section 37A(2) of the Act the project must satisfy one or more of the following criteria:

- a. The development must be of strategic economic or social importance to the State or the Region in which it would be situate;
- b. The development would contribute substantially to the fulfilment of any of the objectives in the National Planning Framework or in any regional spatial and economic strategy in force in respect of the area in which it would be situate;
- c. The development would have a significant effect on the area of more than one planning authority.

It is acknowledged that the Commission will consider whether the Proposed Project satisfies other criteria in relation to its national or regional importance and its contribution towards fulfilling national and regional objectives.

Assessing the proposal against each of the development criteria listed above, we would comment as follows:

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- a. The development would be of strategic economic or social importance to the State or the region in which it would be situated.

Given the scale of the Proposed Project, it will have an installed capacity in excess of 50MW of renewable energy - it is considered to be wholly of a strategic nature and of strategic economic and social importance to the region and state. The capital investment required for the construction of a project of the scale proposed, when combined with the commercial rates, contributions and community gain proposals associated with the operation of the Proposed Project, it will cumulatively represent a significant economic contribution to the region if not the country as a whole. The Proposed Project will generate a large quantity of electricity to contribute to Ireland's renewable energy generation and carbon saving targets as set out at national level. As a renewable energy proposal, the project will assist in meeting national renewable energy targets and will also result in significant reductions in carbon emissions from electricity generation and reduce the country's reliance on imported fossil fuels.

- b. The development would contribute substantially to the fulfilment of any of the objectives in the National Planning Framework or in any regional spatial and economic strategy in force in respect of the area or areas in which it would be situated

The Proposed Project is in accordance with the promotion of sustainable energy development as set out in the provisions of Project Ireland 2040: National Planning Framework, Project Ireland 2040: National Development Plan and the Regional Spatial and Economic Strategy for the Southern Region (RSES). The project is also compliant with the objectives of the National Mitigation Plan 2017, Climate Action Plan 2024 and the overall national objective to decarbonise electricity generation. National Planning Framework ('NPF') Policy Objective 55 directly supports renewable energy:

"Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050."

At regional level, the Proposed Project will directly contribute to meeting the following Regional Policy Objectives of the RSES for the Southern Region:

- *RPO 87: The RSES is committed to the implementation of the Government's policy under Ireland's Transition to a Low Carbon Energy Future 2015-30 and Climate Action Plan 2019 [superseded by CAP 2021]. It is an objective to promote change across business, public and residential sectors to achieve reduced GHG emissions in accordance with current and future national targets, improve energy efficiency and increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport and agriculture."*
- *RPO 95 - It is an objective to support implementation of the National Renewable Energy Action Plan (NREAP), and the Offshore Renewable Energy Plan and the implementation of mitigation measures outlined in their respective SEA and AA and leverage the Region as a leader and innovator in sustainable renewable energy generation.*
- *RPO 98 - It is an objective to support the development of a Regional Renewable Energy Strategy with relevant stakeholders.*
- *RPO 99 - It is an objective to support the sustainable development of renewable wind energy (on shore and offshore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.*

In summary, the proposal will significantly contribute towards meeting sustainable energy targets and objectives at County, Regional and National level and this criterion is therefore accorded with.

- a. The development would have a significant effect on the area of more than one planning authority. The third criterion set out in Section 37A(2) of the Act, that the development would have a “significant effect” on the area of more than one Planning Authority. “Planning Authority” is defined within the Act as either:
- b. In the case of a county, exclusive of any borough or urban district therein the council of the county,
- c. In the case of a county or other borough, the corporation of the borough, and
- d. In the case of an urban district, the county of the urban district.

The proposed wind turbines and grid connection options are located entirely within the functional area of Waterford County Council.

Concluding Remarks and Consultation Request

At the time of writing, it is our view that the Proposed Project will exceed the relevant thresholds set out in the Seventh Schedule of the Planning and Development Act 2000, as amended, and satisfy the criteria of Section 37A(2) of the Act, as set out above. As such, the Proposed Project constitutes Strategic Infrastructure Development, and we look forward to a determination from An Coimisiún Pleanála in this regard. It is intended that a design flexibility opinion will be sought from An Coimisiún Pleanála in relation to the Proposed Project.

In view of the above and on behalf of our client, we are seeking to enter into pre-application consultation with the Commission as to whether or not the Proposed Project as outlined constitutes Strategic Infrastructure Development.

In this regard it is important that any final planning application is made to the appropriate competent authority to ensure compliance with due process. We understand the Commission will facilitate a meeting/meetings to discuss the details of the Proposed Project and are seeking to convene same at the Commission’s earliest convenience.

The statutory fee of €4,500 has been paid by to An Coimisiún Pleanála by Electronic Funds Transfer (Ref no: 0MAP6KTFBW1UTKN5, Payment Ref: Slievegrine Renewable Energy Development Pre-app request, Date of Payment: 7th July 2025).

I trust the information contained in this request is of use and look forward to receiving a meeting date with the Commission in due course.

Yours faithfully,



Ronan Dunne

Project Planner,

MKO

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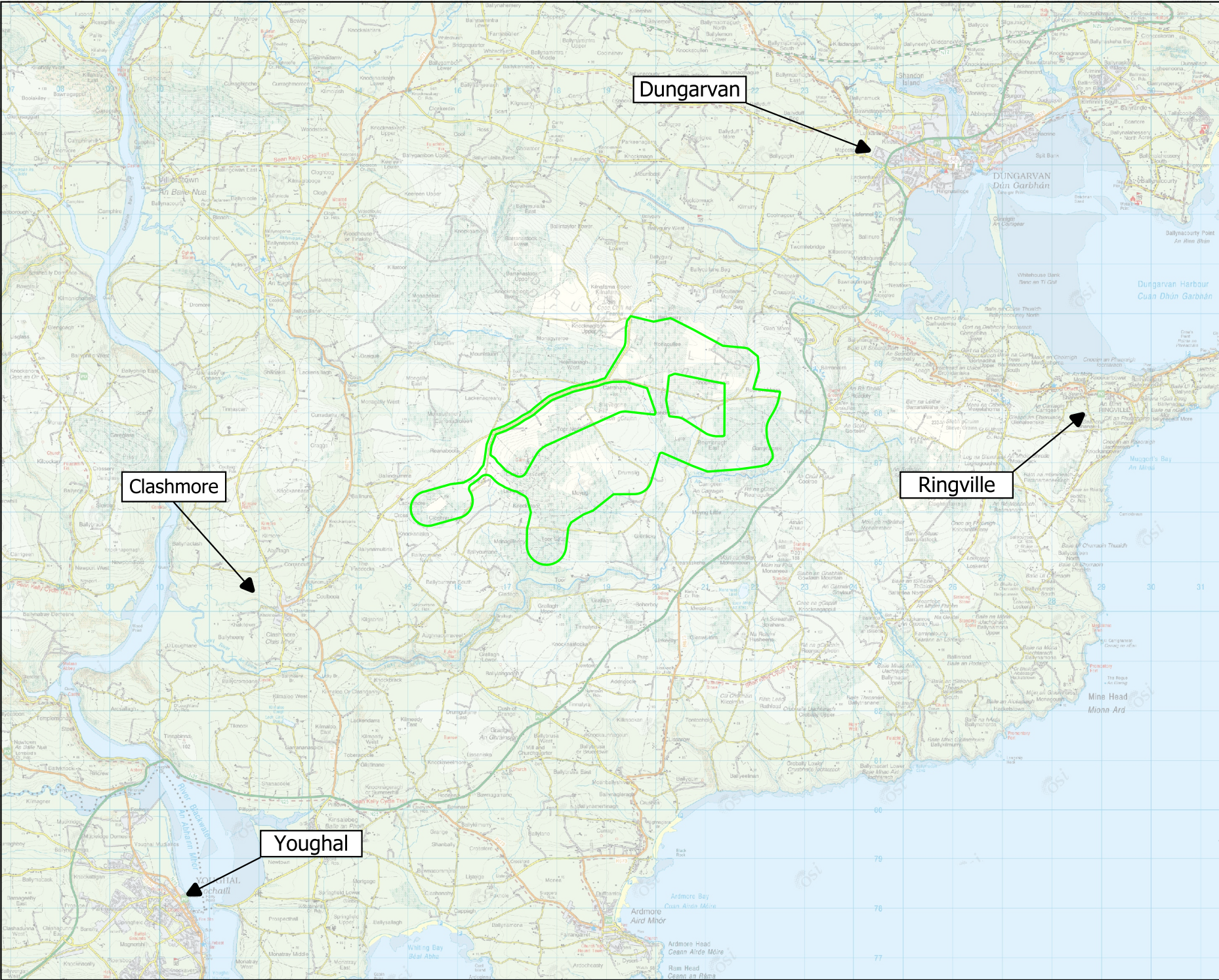
Enclosed

- Site Location Context Map (Scale: 1:100,000)
- Grid Connection Points Map (Scale: 1:75,000)
- Wind Energy Strategy Map (Scale: 1:50,000)

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Map Legend

 EIAR Site Boundary



Drawing Title

Site Location Context

Project Title

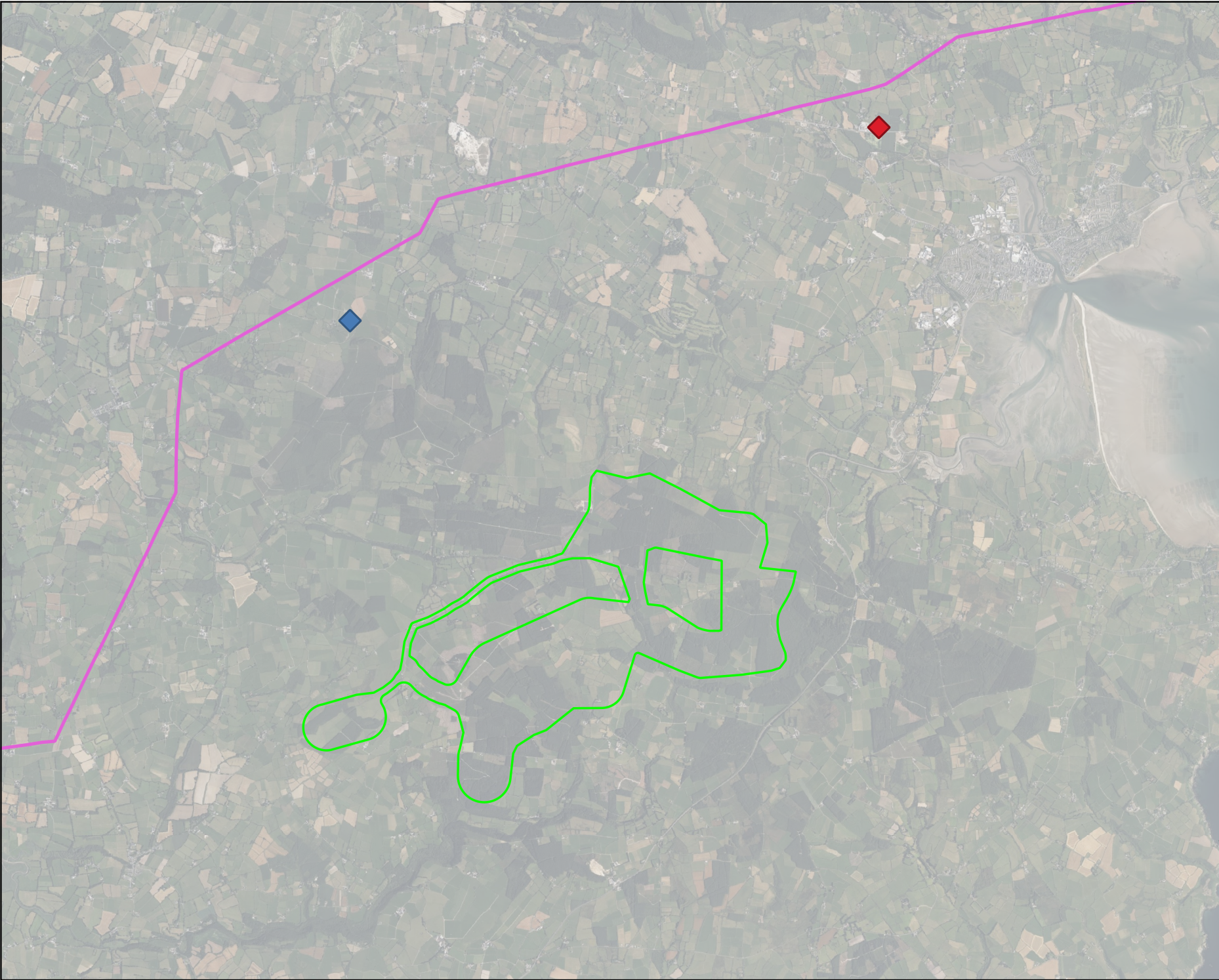
Slievegrine Renewable Energy Development

Drawn By	Checked By
MC	EMC
Project No.	Drawing No.
240740	Figure 1
Scale	Date
1:100,000	02.07.2025



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Map Legend

-  EIAR Site Boundary
-  Woodhouse 110kV substation
-  Dungarvan 110kV substation
-  220kV Knockraha-Cullenagh Overhead Line



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Drawing Title

Grid Connection Points

Project Title

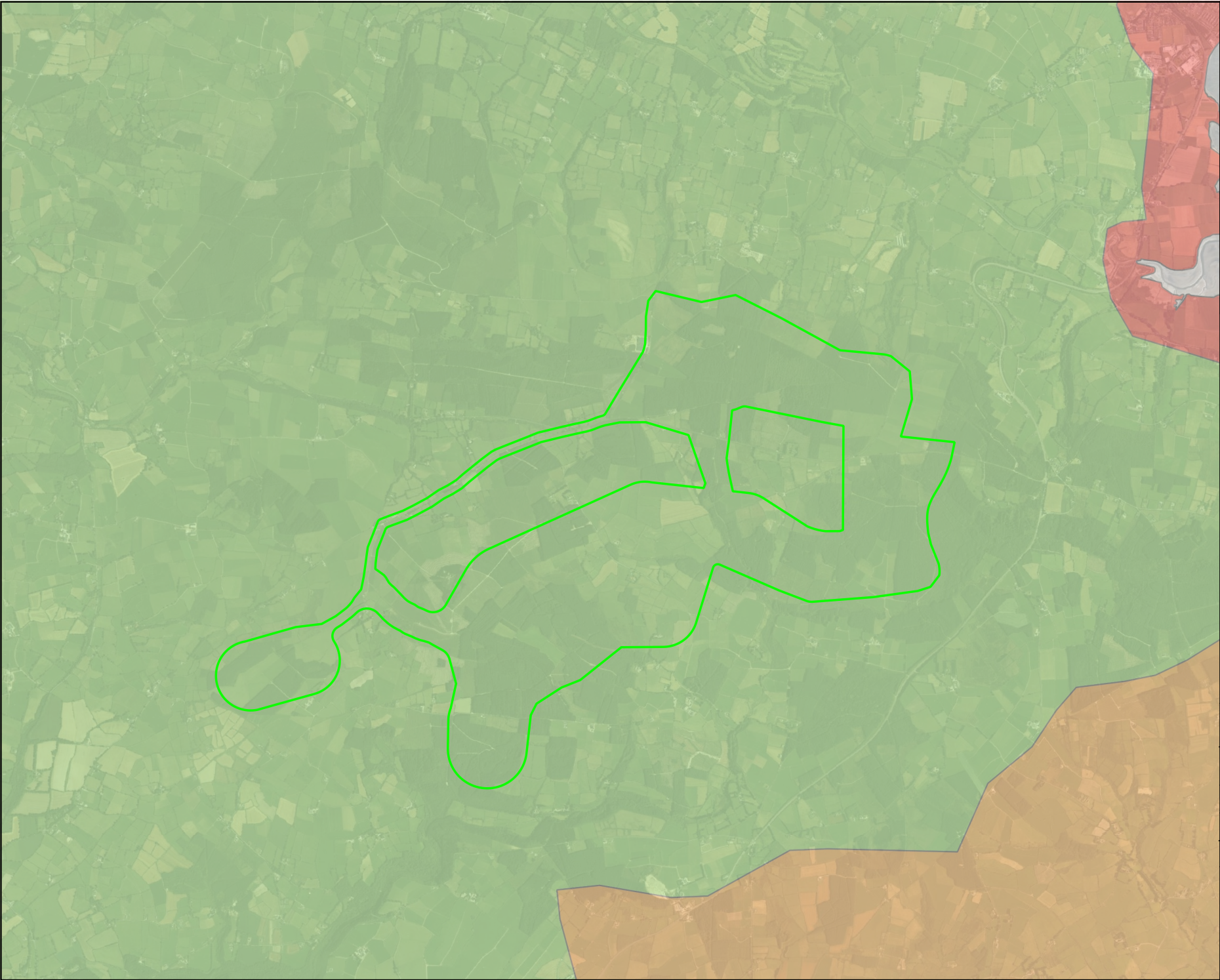
Slievegrine Wind Farm

Drawn By	MC	Checked By	EMC
Project No.	240740	Drawing No.	Figure 2
Scale	1:75,000	Date	02.07.2025



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Map Legend

 EIAR Site Boundary

**Waterford City and County Council
Wind Energy Strategy 2016-2030**

 Exclusion Area

 Open for Consideration

 Preferred Area



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Drawing Title

Wind Energy Strategy

Project Title

**Slivegrine Renewable Energy
Development**

Drawn By

MC

Checked By

EMC

Project No.

240740

Drawing No.

Figure 3

Scale

1:50,000

Date

02.07.2025



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