



An Coimisiún Pleanála,
Strategic Infrastructure Development,
64 Marlborough Street,
Dublin 1.

Our ref: 230841

Your ref: N/A

Date: 17th October 2025

Re: Proposed Repowering of the existing Dunneill and Kingsmountain Wind Farms, located in the townlands of Ballyglass, Crowagh or Dunneill Mountain, Tawnadremira, Dunowla and Kingsmountain, Co. Sligo - Consultation Request under Section 37B / Design Flexibility Request under Section 37CC(1) of the Planning and Development Act 2000 (as amended).

Dear Sir/Madam,

On behalf of our client, SSE Renewables (Ireland) Ltd (“SSER”), MKO hereby submits two related requests to An Coimisiún Pleanála (the Commission) in respect of the proposed repowering of the existing Dunneill and Kingsmountain Wind Farms, located in the townlands of Ballyglass, Crowagh or Dunneill Mountain, Tawnadremira, Dunowla and Kingsmountain, Co. Sligo (the Proposed Development). These are as follows:

1. A Request for a Further Strategic Infrastructure Development (SID) Pre-Application Consultation Meeting under Section 37B of the of the Planning and Development Act 2000 (as amended) (the Act).
2. A Request for a Design Flexibility Meeting under Section 37CC(1) of the Act.

Each request is addressed separately below.

The Prospective Applicant

The prospective applicant for the Proposed Development is SSE Renewables (Ireland) Ltd (SSER). SSER is a leading developer and operator of renewable energy across the UK and Ireland, with a portfolio of around 4GW of onshore wind, offshore wind and hydro. SSE Renewables owns over 700MW of operational onshore wind farms in locations across the Republic of Ireland. These include Ireland’s largest wind farm, 174MW Galway Wind Park in Connemara, County Galway, which is co-owned with Greencoat Renewables.

Site Location and Context

The Proposed Development is located approximately 3.5 kilometres (km) south of the village of Dromore West and approximately 3.7 km southwest of the village of Templeboy in County Sligo. An assessment of the proposed site access is currently ongoing. The site will be accessed via the L2702 local road and off the N59 National Road, which runs in a north-south direction to the west of the site. And by existing access roads within the Dunneill and Kingsmountain Wind Farms.

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Dunneill and Kingsmountain Wind Farms encompasses two separate wind farm projects. Dunneill Wind Farm has a capacity of 11.1MW and currently contains 13 Vesta V52 turbines, while Kingsmountain has a capacity of 25MW and currently contains 10 Nordex N18 alpha turbines.

1. Request for second Pre-Application Consultation Meeting under Section 37B of the Act.

The prospective applicant engaged with the Commission (ABP-320934-24) under the provisions of Section 37B of the Planning and Development Act 2000 (as amended), as to whether the Proposed Development would meet the thresholds of the Seventh Schedule of the Act. A SID meeting under the provisions of Section 37B was held with the Commission on 25th November 2024.

MKO, on behalf of our client, SSER, are requesting a second meeting with the Commission to further consider the SID status, or otherwise, of the repowering of the existing Dunneill and Kingsmountain Wind Farms (to be known as Crumhach Wind Farm).

In brief, the purpose of this meeting is to discuss recent updates and refinements to the project design and scope since the first SID meeting to address the implications of the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. No. 274 of 2025). These Regulations, published on 12th August 2025, transpose several key aspects of the Renewable Energy Directive (RED III) into national law, including the immediate introduction of “Completeness Checks” following application lodgement.

It is now considered necessary to undertake a further Pre-Application Consultation meeting with the Commission to ensure a shared understanding of, and where possible, agreement on, the content and requirements of the Completeness Check, as well as to address any other pertinent aspects of this new legislation that may impact the project prior to submission.

2. Request for a Design Flexibility Meeting under Section 37CC(1) of the Act

MKO, as part of the consultations under Section 37B, is also seeking a design flexibility meeting with the Commission under Section 37CC(1) of the Act. This request for a flexibility meeting is in accordance with the recently commenced legislative provisions related to design flexibility introduced by the Planning and Development, Maritime and Valuation (Amendment) Act 2022. The legislation establishes a process where prospective applicants can seek a meeting with the Commission to receive an opinion on whether it is appropriate to submit an application for permission before certain details of the Proposed Development are finalised. Section 37CC (1) provides that the request for such a meeting would be as part of consultations referred to in section 37B(1).

This request provides the Commission with information as to the proposed site location, components, planning policy context and finally an assessment of the proposal against the Strategic Infrastructure Development thresholds and determination criteria. It further provides the information identified in section 37CC of the Act.

Development Description and Possible Effects on the Environment

The Proposed Development is nearing the final stage of design and the Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) are currently being prepared. The main elements of the Proposed Development as of the latest design includes, inter alia, the following:

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- Repowering of the existing SSE Dunneill and Kingsmountain Wind Farms which currently have a combined generating capacity of 36.1MW and 23 no. wind turbines,
- The provision of 17 no. new wind turbines comprising the Crumhach Renewable Energy Development. The new turbine layout will incorporate the existing Dunneill and Kingsmountain Wind Farms as well as additional greenfield lands,
- An onsite 110kV substation,
- All associated site development works.

The Proposed Grid Connection (underground grid connection cabling route to the existing Srananagh 220kV substation, Co. Sligo) is an integral part of the planning application for the Proposed Development and is fully assessed in the EIAR, however, it will be subject to a separate planning application at a later stage.

It is proposed that the grid connection for the Proposed Development will utilise the existing grid connections to Cunchill Substation, currently shared by Dunneill and Kingsmountain Wind Farms, that has an existing capacity of 36MW. To accommodate the additional energy generation from Crumhach Renewable Energy Development, it is proposed that a new 39km underground cable and an onsite substation will be constructed to connect the remaining capacity to the Srananagh 220kV Substation. The proposed new onsite 110kV substation will be included in the planning application submitted to the Commission.

Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended (the Regulations), identifies classes and scales of development that require Environmental Impact Assessment (EIA). The relevant class of development in this case relates to *“installations for the harnessing of wind power for energy production (wind farms) with more than 5 turbines or having a total output greater than 5 megawatts”*, as per item 3(i) of the Schedule. The Proposed Development exceeds 5 Megawatts in scale and proposes more than 5 turbines and therefore is subject to EIA. All elements of the Proposed Development are assessed as part of the EIAR that will form part of the planning application.

The EIAR uses the grouped structure method to describe the existing environment, the potential impacts of the Proposed Development thereon and the proposed mitigation measures. Background information relating to the Proposed Development, scoping and consultation undertaken and a description of the Proposed Development will be presented in separate sections. The grouped format sections describe the impacts of the Proposed Development in terms of population and human health, biodiversity, with specific attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EEC; land, soils and geology, water, air quality, climate, noise and vibration, landscape and visual, cultural heritage and material assets such as traffic and transportation, and vulnerability to natural disasters together with the interaction of the foregoing, and schedule of mitigation and monitoring.

The EIAR will comply with the EIA Directive as amended by Directive 2014/52/EU. Industry-wide, best practice methodologies and standards will be used in preparation of the EIAR. The likely significant effects of the Proposed Development will be described using standard, best-practice terminology. In consultation with the project design team, appropriate mitigation measures will be proposed in the EIAR to reduce, remedy or eliminate any likely negative effects identified.

The EIAR that will be submitted by the applicant provides the relevant environmental information to enable the EIA to be carried out by the competent authority. An Appropriate Assessment Screening

Report (AASR) and Natura Impact Statement (NIS) will also be prepared in line with the Habitats Directive.

Proposed Design Flexibility Parameters

The details of the Proposed Development unlikely to be confirmed at the time of the proposed application are as follows:

- Turbine total tip height,
- Turbine rotor diameter,
- Turbine hub height.

The parameters within which the turbine specifications will fall are as follows:

- Turbine total tip height range of 176.6m – 180m,
- Turbine rotor diameter range of 133.2m – 150m,
- Turbine hub height range of 105m – 110m.

Each turbine will be capable of generating from 5.5MW to 6.6MW, with an overall installed capacity of between 93.5MW and 112.2MW.

In accordance with the new legislative provisions, the proposed application for permission will include the sufficient information, in respect of the parameters outlined above, within which the unconfirmed details fall as is considered necessary to enable the competent authority to make a decision on the application.

The turbine parameters described above will be clearly shown on the suite of planning drawings, including elevations, in accordance with the requirements of the Regulations. The proposed application will also include an EIAR and NIS with the necessary information to enable the Commission to carry out an assessment of all the likely significant effects of the Proposed Development on the environment. The assessment of the wind turbine parameters will be complete and of sufficiently high quality, in accordance with Annex IV of the EIA Directive.

The design flexibility requirement arises due to the inherent lengthy timescales associated with developing a wind farm project. It can be a number of years between planning submission and commencement of construction due to various factors including planning determination timescales, timing of support scheme auctions, and grid availability.

During this time, wind turbine technology is continuously evolving. There is therefore a degree of uncertainty as to which make/model of wind turbine will be available to the project at the time of construction. Therefore, it is difficult to establish exact turbine dimensions at the pre-planning stage.

The final wind turbine type will be chosen at the pre-construction stage, following a competitive tender process with eligible turbine suppliers. The dimensions of the chosen turbine will fall within the range specified above. The final turbine dimensions will be confirmed with the Planning Authority at least 2 weeks prior to the erection of the turbines at the proposed site.

Request for Meeting under Section 37CC

On behalf of SSER, MKO wishes to request a design flexibility meeting with the Commission at the earliest convenience, in order to discuss details of the Proposed Development that are unlikely to be confirmed at the time of the proposed application.

We note that the Regulations, facilitate the making of this request in the form set out at Form No. 20 of Schedule 3, or a form substantially to the like effect. A copy of this completed form accompanies this request. Furthermore, in accordance with Article 15(J)(2) of the Regulations, we request the Commission consents for this request (i.e., to enter into a meeting referred to in sub-article (1)) be made in electronic form.

In accordance with Schedule 9 of the regulations a fee of €4,500 was paid at the commencement of pre-application consultation with the Commission.

In support of this request, we have enclosed the following:

- Completed Flexibility Meeting Request Form (Form No.20),
- Figure 1: Site Location at a scale of 1:100,000,
- Figure 2: Draft Turbine Layout Map at a scale of 1:20,000,
- Figure 3: Wind Turbine Elevation Plan.

It is kindly requested that both meetings are scheduled back-to-back, in the interests of practicality and efficiency. I trust the above is in order and look forward to hearing from the Commission in due course.

Yours sincerely,

Alan Clancy

Alan Clancy BA, MPlan, MIPI

Senior Planner, MKO

Tel: 091 735 611

Email: aclancy@mkoireland.ie

Schedule

Form No. 20

Article 15J

Flexibility meeting request form

BEFORE FILLING OUT THIS FORM PLEASE NOTE THE FOLLOWING

Failure to complete this form or attach the necessary documentation, or the submission of incorrect information or omission of required information, **will** lead to the planning authority or An Coimisiún Pleanála refusing to deal with your request. Therefore, ensure that each section of this request form is fully completed and signed, entering n/a (not applicable) where appropriate, and that all necessary documentation is attached to the request form.

HOLDING OF MEETING WITH THE PLANNING AUTHORITY OR AN COIMISIÚN PLEANÁLA

Under section 32J of the Planning and Development Act 2000, as amended, neither the taking place of a meeting under section 32H nor the provision of an opinion or notification under section 32I shall prejudice the performance by the planning authority of its functions under this Act or any regulations under this Act or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Under section 37C of the Planning and Development Act 2000, as amended, the holding of consultations under section 37B shall not prejudice the performance by An Coimisiún Pleanála of any other of its functions under this Act or regulations under this Act and cannot be relied upon in the formal planning process or in legal proceedings.

Under section 182E of the Planning and Development Act 2000, as amended, neither the holding of consultations under subsection (1), nor the provision of an opinion under subsection (3), shall prejudice the performance by An Coimisiún Pleanála of any other of its functions under this Act or regulations under this Act, or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Under section 288(2) of the Planning and Development Act 2000, as amended, the performance by An Coimisiún Pleanála of functions under section 287 shall not prejudice the performance by it of any of its other functions in relation to the prospective applicant, proposed application or proposed development concerned, or be relied on by any person in relation to; an application or request under this Chapter, the consideration by An Coimisiún Pleanála of such application or request, or the making of a decision under this Chapter in respect of such application or request, or in proceedings before a court relating to, or in connection with, such application, request, consideration or decision.

DATA PROTECTION

It is the responsibility of persons or entities wishing to use any personal data on this form for direct marketing purposes to be satisfied that they may do so legitimately under the requirements of the Data Protection Acts 1988 to 2018. The Office of the Data Protection Commissioner states that the sending of marketing material to individuals without consent may result in action by the Data Protection Commissioner against the sender including prosecution.

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Form No. 20	Planning Authority Logo
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Flexibility Meeting Request to **An Coimisiún Pleanála** regarding

Flexibility with regard to Proposed Application for Permission or Approval

1) Prospective Applicant's Name:	SSE Renewables (Ireland) Ltd
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2) Request for meeting	
☐	Section 32H(1) Request- section 34 application
☒	Section 37CC(1) Request- section 37E application (SID)
☐	Section 182F(1) Request- section 182B Strategic Electricity Application
☐	Section 182F(1) Request- section 182D Strategic Gas Application
☐	Section 287A(1) Request- section 291 Maritime Area Application

3) Contact details of person authorised to operate on behalf of the Prospective Applicant (Applicant or Agent): (Not for Public release)	
Name:	Alan Clancy
Correspondence Address:	MKO, Tuam Road, Galway, Ireland, H91 VW84
Telephone:	091 735 611
Email:	aclancy@mkoireland.ie

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4) Proposed Development	
Address of the proposed development:	In the townlands of Ballyglass, Crowagh or Dunneill Mountain, Tawnadremira Ballygreighan Barr, Dunowla and Kingsmountain Co. Sligo.
Description of the proposed development:	The main elements of the Proposed Development as of the latest design includes, <i>inter alia</i>, the following: • Repowering of 23 no. turbines at the existing SSE Dunneill and Kingsmountain Wind Farms. • The provision of 25 no. new wind turbines comprising the Crumhach Wind Farm. • Cabling for grid connection. • All associated site development works.

5) Declaration:	
I hereby declare that, to the best of my knowledge and belief, the information given in this form is correct and accurate and fully compliant with the Planning and Development Act 2000, as amended, and the Regulations made thereunder.	
6) Signature of person authorised to operate on behalf of the Prospective Applicant:	
<i>Alan Clancy</i>	
Date:	17 th October 2025

7) Formal Request:

In accordance with section 37CC of the Planning and Development Act 2000, as amended*,* and article 15J of the Planning and Development Regulations 2001, as amended, **SSE Renewables (Ireland) Ltd** formally requests to enter into a meeting with **An Coimisiún Pleanála** regarding the **Proposed Wind Farm Repowering of the existing Dunneill and Kingsmountain Wind Farms in County Sligo**.

8) Information to be included where relevant, with a meeting request under section 32H, 37CC, 182F or 287A of the Planning and Development Act 2000, as amended and article 15J the Planning and Development Regulations 2001, as amended.

Information	Enclosed with Request
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(a) A site location map sufficient to identify the land on which the proposed development would be situated.	Yes:[X]	No:[]	See Cover letter
(b) A brief description of the nature and purpose of the proposed development and of its possible effects on the environment.	Yes:[X]	No:[]	See Cover letter
(c) A draft layout plan of the proposed development.	Yes:[X]	No:[]	See Cover letter
(d) A description of the details, or groups of details, of the proposed development that, owing to the circumstances set out in paragraph below, are unlikely to be confirmed at the time of the proposed application.	Yes:[X]	No:[]	See Cover letter
(e) A description of the circumstances relating to the proposed development, that indicate that it is appropriate that the proposed application be made and decided, before the prospective applicant has confirmed the details referred to in paragraph (d) above.	Yes:[X]	No:[]	See Cover letter

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(f) An undertaking to provide with the proposed application, either - i. two or more options, in respect of each detail or group of details, referred to in paragraph (d) above, containing information on the basis of which the proposed application may be made and decided, or ii. parameters within which each detail referred to in paragraph (d) above will fall and on the basis of which the proposed application may be made and decided, or iii. a combination of (i) and (ii).	Yes:[X]	No:[]	See Cover letter
(g) Such other information, drawings or representations as the prospective applicant may wish to provide or make available. (Turbine Drawing)	Yes: [X] See enclosed with cover letter	No:[]	N/A:[]
(h) The appropriate fee.	Yes:[X]	No:[]	No fee required

9) Official Use only:	
Planning Reference:	
Planning Authority/ An Pleanála Stamp:	

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Map Legend

EIAR Site Boundary

Spatial Reference
Name: IRENET95 Irish Transverse Mercator
Datum: IRENET95
Projection: Transverse Mercator

SITE LOCATION - NOT TO SCALE

Drawing Title

Site Location

Project Title

Crumhach Renewable Energy Development

Project No.	Drawing No.	Scale
230841	1	1:100,000
Drawn By	Checked By	Date
EM	BT	17/10/2025

Email: info@mkofireland.ie / Website: www.mkofireland.ie

545000

830000



Map Legend

- ElAR Site Boundary
- Proposed Turbines
- Proposed Turbine Hardstands
- Proposed Temporary Construction Compounds
- Proposed New Roads
- Proposed Upgrades to Existing Roads
- Proposed Upgrades to Public Road
- Proposed Peat and Spoil Management Areas
- Proposed Borrow Pits
- Proposed Decommissioned Turbine Laydown Area
- Proposed Onsite 110kV Substation
- Proposed Grid Connection Route
- Proposed Turbine Delivery Route

Spatial Reference
Name: IRENET95 Irish Transverse Mercator
Datum: IRENET95
Projection: Transverse Mercator



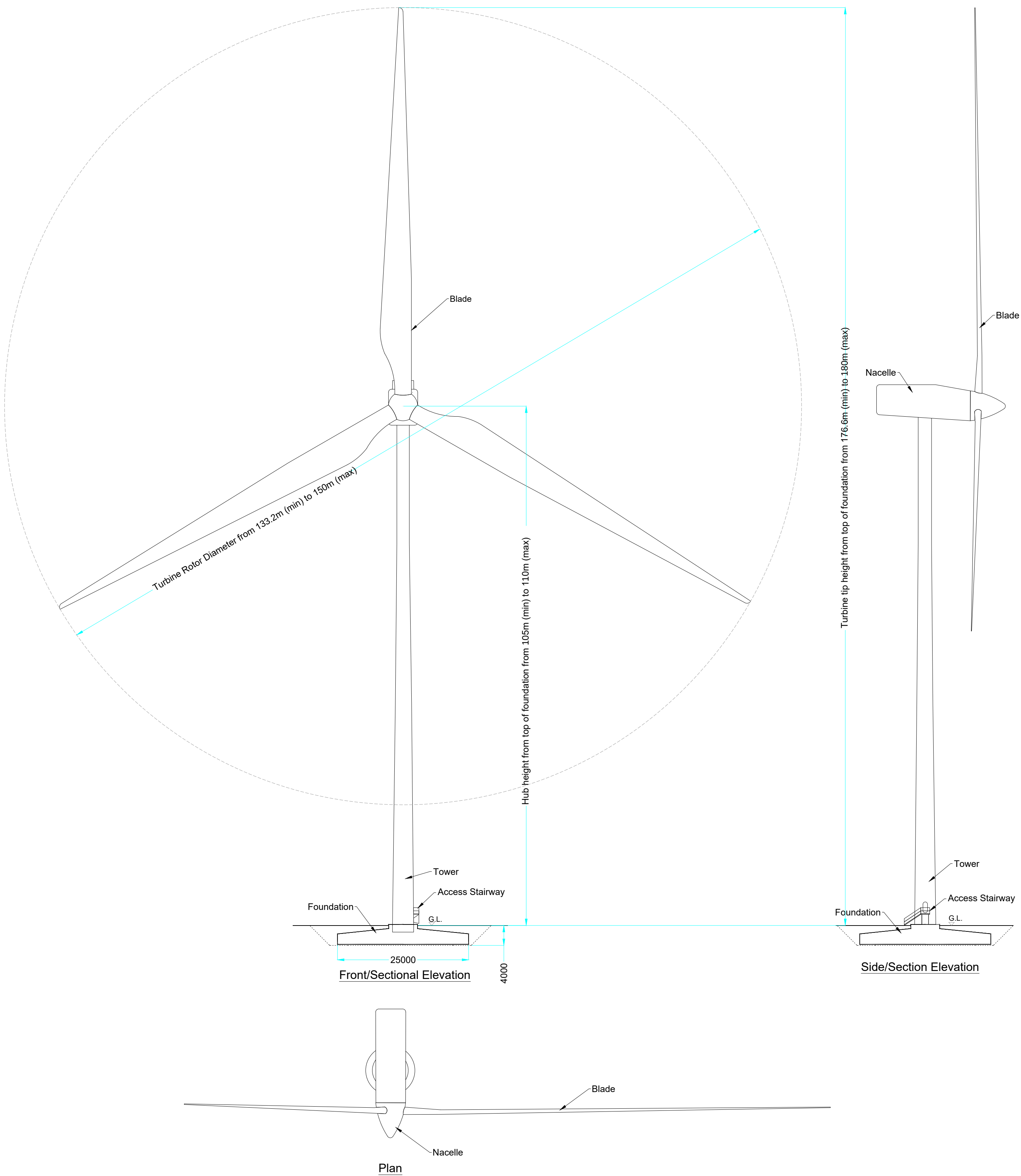
SITE LOCATION - NOT TO SCALE

Drawing Title		
Proposed Site Layout		
Project Title		
Crumhach Renewable Energy Development		
Project No.	Drawing No.	Scale
230841	2	1:20,000
Drawn By	Checked By	Date
EM	BT	17/10/2025



Email: info@mkofireland.ie / Website: www.mkofireland.ie

545000



PROJECT TITLE: Crumhach Renewable Energy Development			
DRAWING TITLE: Wind Turbine Elevations & Plan Rotor Diameter and Hub Height Range			
PROJECT No.: 230841	DRAWING No.: 230841 - 01	SCALE: 1:500 @ A1	
DRAWN BY: KD	CHECKED BY: AC	DATE: 13.10.2025	REVISION.: D01
 Email: info@www.mkoireland.ie /Website: www.mkoireland.ie			