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Sent: Thursday 23 April 2026 10:14

To: SIDS <sids@pleanala.ie>

Subject: ACP Ref: 323958-25 Ballyfasy Wind Farm Grid Connection

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Good morning,

In relation to ACP Ref: 323958-25, please find attached the Ballyfasy Wind Farm Grid Connection Response to Submissions report prepared on behalf of Manogate Ltd.

As requested, one hard copy will also be submitted to ACP today.

Should you have any queries, please do not hesitate to get in contact.

Can you please confirm receipt of this email?

Best regards,

Allison Murphy BSc MSc

Associate Director - Environment & Planning

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Case Number ACP – 323958-25

Ballyfasy Wind Farm Grid Connection

Response to Submissions Report



MANOGATE LTD

A FuturEnergy Ireland and ART Generation Joint Venture

Document Control Sheet	
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Client:	Manogate Ltd
Project Reference	11474

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1. INTRODUCTION

1.1 PURPOSE OF THIS REPORT

This report has been prepared in response to a letter from An Coimisiún Pleanála (ACP) dated 25th February 2026, inviting the applicant (Manogate Ltd) to respond to the 36 no. submissions received in respect of a planning application for the proposed Ballyfasy Wind Farm Grid Connection (case number ACP-323958-25). The two Grid Connection Options (GCO) which form this application are illustrated herein on Figure 1-1 for ACP ease of reference.

We confirm that the following responses address all the grid connection matters raised in the submissions.

1.2 FORMAT OF RESPONSE

This response document firstly addresses the themes raised in the prescribed body submissions followed by the third party submissions. Each theme is discussed in a specific section of this response. The submissions contain a large number of comments. Although many comments do not necessitate response, it should not be taken that the applicant accepts or agrees with those comments. This submission has focused on the points raised under each theme where a response is warranted and may be helpful for ACP in making a determination on the application.

All specialists involved in the preparation of the Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) have reviewed each of the individual observations and have provided a technical response to the items relevant to their area of expertise and EIAR chapter.

1.3 RELEVANT PLANNING AND LEGAL CONTEXT

This section of the report will respond to observations received relating to the general planning and legal context of the planning application, which we note is dynamic and changing. There have been some notable changes to planning case law, which we are set out below. This section will provide a short summary of the following key case law and government policy relevant to the proposed Ballyfasy Wind Farm project:

- Coolglass Wind Farm Limited v An Coimisiún Pleanála [2026] IESC 5
- Friends of Killymooney Lough -v- An Coimisiún Pleanála & Ors [No.2] [2025] IEHC 576
- Energy Security in Ireland to 2030

Coolglass Wind Farm Limited v An Coimisiún Pleanála [2026] IESC 5

Since the lodgement of this planning application on the 15th December 2025, a Supreme Court judgment has been issued, which is of relevance to the consideration of the proposed project.

The Supreme Court's judgment in *Coolglass Wind Farm Limited v An Coimisiún Pleanála [2026] IESC 5*, was issued on 4th of February 2026, and provides important support for the proposed Ballyfasy Wind Farm insofar as it confirms that, in determining an application for renewable energy development, ACP must engage in a **real and substantive way** with the **climate benefits** of the project.

The judgement emphasises that renewable electricity and climate mitigation benefits of development must be expressly considered as part of the planning balance. At the same time,



the Court made clear that Section 15 of the Climate Action and Low Carbon Development Act 2015 (as amended) does **not** create an automatic presumption in favour of every renewable energy project, **but it does require that climate objectives be meaningfully addressed within the decision-making process.**

The Climate Action and Low Carbon Development Act 2015 (as amended), outlines duties for certain bodies (which includes consenting authorities) under Article 15 (1) as follows:

A relevant body shall, in so far as practicable, perform its functions in a manner consistent with—

- (a) *the most recent approved climate action plan,*
- (b) *the most recent approved national long term climate action strategy,*
- (c) *the most recent approved national adaptation framework and approved sectoral adaptation plans,*
- (d) *the furtherance of the national climate objective, and*
- (e) *the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.*

In this regard, the proposed Ballyfasy Wind Farm Grid Connection is consistent with each of the matters identified in Section 15(1)(a)–(e) of the Climate Action and Low Carbon Development Act 2015, as amended, insofar as it would contribute to the delivery of renewable electricity, support national emissions reduction and climate neutrality objectives, and form part of the wider transition to a climate-resilient energy system:

Article 15(1) Criterion	Response of Proposed Development
<p><i>(a) The most recent approved climate action plan</i></p>	<p>The proposed grid connection aligns with the most recent approved Climate Action Plan, namely Climate Action Plan 2025, which identifies the transition to renewable electricity as a central part of Ireland’s pathway to halving emissions by 2030 and achieving climate neutrality by no later than 2050. The Plan provides that Ireland is to achieve 80% of electricity demand from renewable sources by 2030. In that context, the proposed grid connection would facilitate the transmission of renewable electricity from the associated wind farm to the national grid and would therefore represent essential enabling infrastructure for the delivery of additional renewable electricity generation capacity. It is noted that the associated wind farm will have the capacity to generate between 57 MW and 72 MW, which in turn is capable of generating clean electricity for over 40,313 to 50,922 households annually. The proposed grid connection infrastructure would facilitate the transmission of this electricity and therefore make a direct contribution to the delivery of additional renewable electricity generation capacity.</p>
<p><i>(b) The most recent approved national long term climate action strategy</i></p>	<p>The proposed grid connection is also consistent with Ireland’s Long-term Strategy on Greenhouse Gas Emissions Reductions, which sets out the pathway to achieving carbon neutrality by 2050 and identifies the decarbonisation of the electricity sector as a key component of that transition. By enabling the export of indigenous renewable electricity</p>



	generated by the associated wind farm to the national electricity network, the proposed development would support the long-term structural decarbonisation of the national energy system.
<i>(c) The most recent approved national adaptation framework and approved sectoral adaptation plans</i>	The proposed grid connection is capable of being advanced in a manner consistent with the National Adaptation Framework , published in 2024, which provides the national strategy for adaptation measures and requires public bodies and infrastructure sectors to plan for climate resilience. While adaptation is distinct from mitigation, resilient and appropriately designed grid infrastructure forms part of the electricity network required to respond to the effects of climate change. On that basis, the proposed development would support a more climate-resilient energy system, subject to detailed design and assessment.
<i>(d) The furtherance of the national climate objective</i>	The national climate objective under the 2015 Act, as amended, is for the State to pursue and achieve, by no later than 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy . The proposed grid connection would support the furtherance of that objective by enabling renewable electricity generated by the associated wind farm to be connected to and transmitted through the national grid. In doing so, it would facilitate the integration of renewable energy into the electricity system and contribute to the transition to a climate neutral economy and the wider decarbonisation of Ireland’s energy sector.
<i>(e) The objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State</i>	The proposed grid connection supports the objective of mitigating greenhouse gas emissions by enabling the transmission of renewable electricity from the associated wind farm to the national grid, thereby supporting reduced reliance on carbon-intensive generation. As enabling infrastructure, the development would make an important contribution to national emissions reduction efforts by facilitating the use of renewable energy. In addition, by strengthening the capacity of the electricity network to accommodate renewable generation, the proposed development also supports climate adaptation in a broader strategic sense by improving energy resilience and supporting a more sustainable electricity system.

Of note, Section 3 “Strategic Justification” of the submitted Planning Statement outlines EU and National level policy that clearly drives the need for this type of renewable energy development.

The need for the proposed project is driven by the following factors:

- A legal commitment from Ireland to limit greenhouse gas emissions under the Kyoto protocol to reduce global warming;
- A requirement to increase Ireland’s national energy security as set out in Ireland’s Transition to a Low Carbon Energy Future 2015-2030 Adopted Paper;
- A requirement to diversify Ireland’s energy sources, with a view to achievement of national renewable energy targets and an avoidance of significant fines from the EU (the Renewable Energy Directive (EU) 2023/2413 (RED III));
- Provision of cost-effective power production for Ireland which would deliver local benefits;
- Increasing energy price stability in Ireland through reducing an over reliance on imported gas; and



- The proposed project will also aid in bridging the gap of over 4 GW electricity shortfall in Ireland, in turn contributing towards achieving the CAP25 target of 9 GW of energy to be sourced from onshore wind by 2030. The current installed wind capacity at the end of 2024 is 4.8 GW according to Wind Energy Ireland.

Of relevance is the Energy White Paper – Ireland’s Transition to a low Carbon Energy Future, as well as the target outlined under CAP24. Ireland faces significant challenges to meet its EU targets for renewable energy by 2030 and its commitment to transition to a low carbon economy by 2050. The proposed project is critical to helping Ireland address these challenges as well as addressing the country’s over-dependence on imported fossil fuels.

On a regional scale, RPO 44 of the Southern RSES states that:

‘It is an objective to ensure the delivery of sustainable actions under the Rural Development Programme (RDP) 2014-20 and beyond in priority areas of innovation, bio-diversity restoration, water and soil management, renewable energy and waste management, carbon conservation and sequestration, diversification, job creation and ICT development in our rural areas’.

Additionally policy RPO 87 Low Carbon Energy Future:

“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. 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.”

In conclusion, the proposed Ballyfasy Wind Farm project (including grid connection) will contribute towards international, EU, national, regional, and local policy regarding the reduction of dependence on fossil fuels, increased reliance on renewable energy and reducing emissions of GHGs. It will contribute to meeting the EU’s challenging target of at least 42.5% renewable energy by 2030.

It will contribute towards national policies by enabling the transmission of renewable energy which will assist in the exploitation of Ireland’s renewable energy resources. With a proposed capacity of between 57 MW and 72 MW, the proposed Ballyfasy Wind Farm will generate clean electricity for over 40,313 and 50,922 households annually, thereby significantly reducing reliance on imported fossil fuels and contributing to Ireland’s legally binding target of achieving net-zero emissions by 2050.

Friends of Killymooney Lough -v- An Coimisiún Pleanála & Ors [No.2] [2025] IEHC 576

In climate policy terms, the proposed Ballyfasy Wind Farm Grid Connection represents a form of enabling infrastructure that directly supports the achievement of the State’s statutory climate objectives and should be assessed in that context.

As referenced earlier, Section 15 of the Climate Action and Low Carbon Development Act 2015, as amended, requires public bodies, so far as practicable, to perform their functions in a manner consistent with national climate goals.



In *Friends of Killymooney Lough v. An Coimisiún Pleanála*, the High Court made clear that this statutory framework is relevant to the exercise of consent functions, and that a development may properly be regarded as “compatible” where it contributes to those goals, including where it aligns with and assists implementation of the relevant Climate Action Plan. The High Court articulated three essential steps for projects that cause greenhouse gas emissions: 1. Identify net emissions, 2. Evaluate against targets, and 3. Evaluate practicability.

This reasoning is particularly supportive of renewable energy infrastructure such as the proposed grid connection. The purpose of the grid connection is to enable and facilitate decarbonisation of the electricity sector and to support delivery of the State’s legally recognised transition pathway.

This is important in the context of carbon budgets. Unlike forms of development that may give rise to significant operational greenhouse gas emissions, a grid connection is understood as infrastructure to enable and transmit renewable energy, which in turn assists in the reduction of reliance on fossil-fuel-based electricity generation. As such, it thereby supports compliance with the national carbon budget framework. Government policy expressly identifies the expansion of onshore wind energy and its associated infrastructure such as the proposed grid connection, as necessary to achieving the target of 80% renewable electricity by 2030 and for supporting the electricity sector’s carbon budget programme. In that way, the proposed development does not consume carbon-budget headroom; rather, it contributes to the structural changes required for the State to remain within its carbon budget trajectory. The carbon-budget analysis in the case law therefore supports the grant of permission for the proposed Ballyfasy Wind Farm project.

Energy Security in Ireland to 2030

The Irish Government’s Energy Security in Ireland to 2030 outlines a new strategy to ensure energy security in Ireland for this decade while ensuring a sustainable transition to a carbon neutral system by 2050. This is extremely important given the current Middle East crisis and energy emergency.

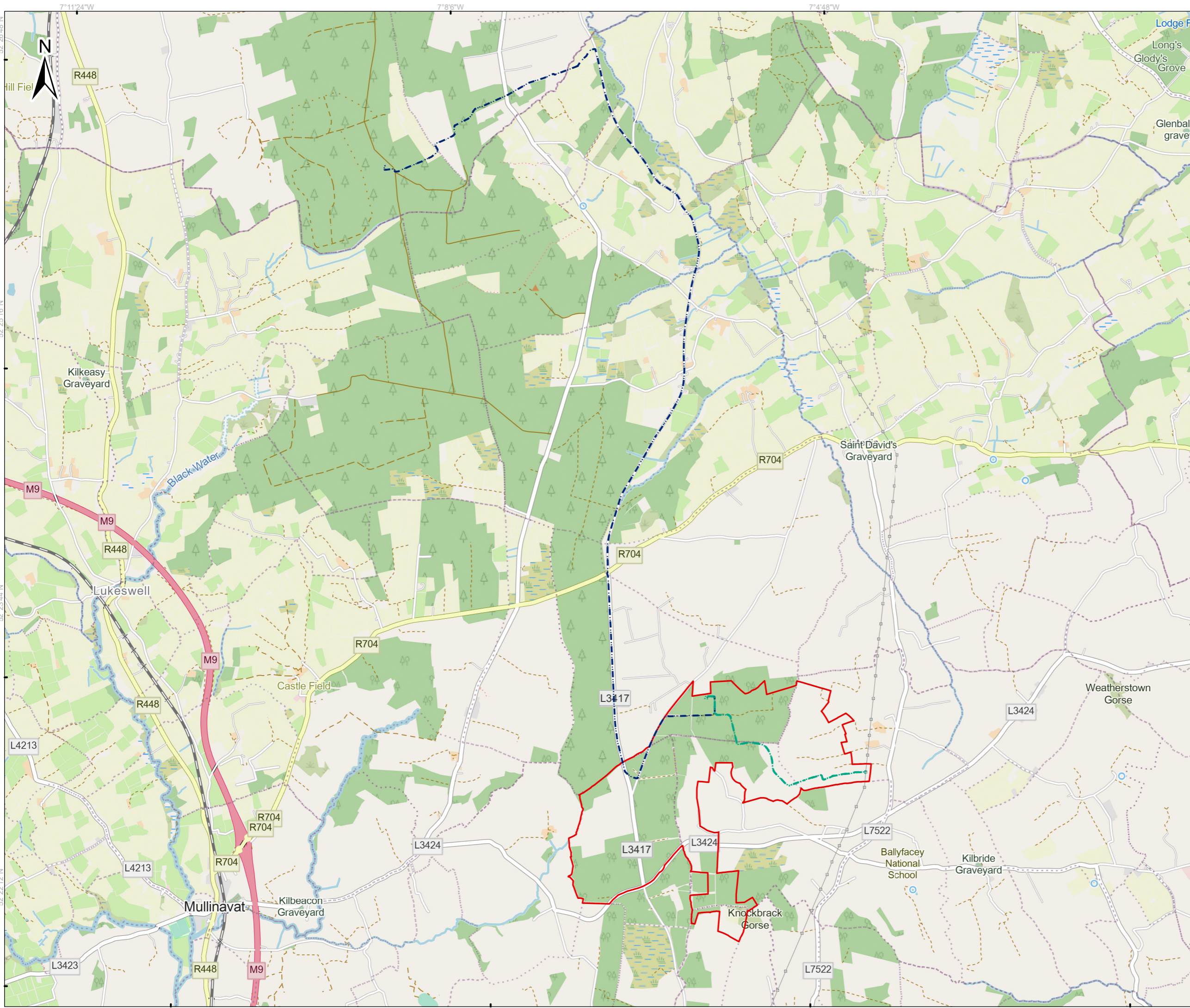
This policy recognises that Ireland faces particular vulnerabilities due to its geographic isolation, heavy reliance on imported fossil fuels, and limited interconnection with other energy markets.

“Informed by the government’s energy security policy objectives - to ensure energy is affordable, sustainable, and secure - the review considered the risks to oil, natural gas, and electricity. The report sets out that Ireland’s future energy will be secure by moving from an oil- and gas-based energy system to an electricity-led system, maximising our renewable energy potential, flexibility and being integrated into Europe’s energy systems. Meeting our climate, renewable, and energy efficiency targets through actions and measures set out in the annually updated Climate Action Plan will deliver this secure energy future”¹.

The development of the proposed Ballyfasy Wind Farm Grid Connection facilitates a project which aligns with this approach and is capable of transmitting clean electricity for over 40,313 to 50,922 households annually. This would make a direct contribution to the delivery of additional renewable electricity generation capacity.

¹ <https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/energy-security-in-ireland-to-2030/>



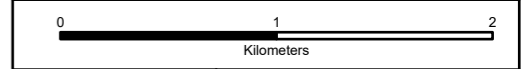


Legend

Wind Farm Study Area

Grid Connection Options

- Option 1
- Option 2



Spatial Reference
Datum: IRENET95
EPSG: 2157

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Rev	Date	Description	By	Chkd.
A	24/11/2025	First issue	S.P	A.M

Client: **Manogate Ltd.**

Project: **Ballyfasy Wind Farm**

Title: **Figure 1-1:
Proposed Grid Connection Options**

Scale @ A3: 1:35,000

Prepared by: S.Pezzetta
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Draft: **A**

2. PRINCIPAL OF RESPONSE

2.1 PRESCRIBED BODIES

2.1.1 Development Applications Unit (DAU)

2.1.1.1 Archaeology

The DAU submission advises of four conditions which should be a condition of any grant of planning 'To ensure the continued preservation (either in situ or by record) of places, caves, sites, features or other objects of archaeological interest'. These conditions are agreeable to the applicant.

2.1.2 Kilkenny County Council (KCC)

2.1.2.1 Kilkenny Wind Strategy

In relation to the Kilkenny City and County Development Plan 2021-2027, the KCC submission states that on the 15th of October 2021, the Minister of State at the Department of Housing, Local Government and Heritage, notified KCC of his intention to issue a Direction to the Kilkenny City and Council Development Plan 2021-2027. In accordance with Section 31 (4) of the Planning and Development Act 2000, those parts of the Kilkenny City and Council Development Plan 2021-2027 referred to in the notice shall be taken to have not come into effect, been made or amended; namely;

- Chapter 11 Renewable Energy
- Section 11.4 Kilkenny Targets
- Section 11.5.1 Current status and targets
- Figure 11.4 Wind Strategy Areas

KCC are awaiting further direction from the Minister in this regard and currently wind energy projects in Kilkenny are being assessed on a project by project basis.

The applicant is aware of this from project consultations with KCC. This issue is discussed in the submitted Planning Statement with the application.

2.1.2.2 Separate Planning Applications / Prematurity

Page 10 of the KCC submission notes that a separate planning application for the grid connection (of the proposed Ballyfasy Wind Farm) is not practical as one application does not function without the other application and therefore they must be considered as a single application.

In response, the applicant has acknowledged that both the wind farm and grid connection applications are linked and has provided an EIAR which assessed both applications. It is a single project for the purposes of EIA (which was stated in statutory notices) and therefore the EIAR addresses all elements of the project (i.e. both applications). Both applications were also submitted on the same date however, both fall under different provisions of Irish planning legislation as discussed at pre planning meetings (proposed wind farm - ACP case number; 320900-24 and proposed grid connection - ACP case number 321814-25) with An Coimisiún Pleanála. Therefore they are required to be submitted separately under Sections 182A and 37E of the Planning and Development Act, 2000, as amended, respectively.



It is also deemed by KCC that the submission of the grid connection application with two options is premature as a route has not been selected. In response, design flexibility has been sought from An Coimisiún Pleanála (ACP case number 322293-25) for the project grid connection (see EIAR Chapter 1 (Introduction), Section 1.10.1 and the ACP design flexibility opinion in EIAR Appendix 1-3). Two options for the grid connection are considered to connect the proposed project to the national grid and both were fully assessed in the EIAR.

As seen in Figure 1-1 above, Grid Connection Option (GCO) One proposes to install a 110kV underground cable from the proposed onsite substation to the consented Castlebanny Wind Farm 110kV substation approximately 12 km to the north.

GCO Two proposes to connect the onsite substation with the existing 110kV Great Island-Kilkenny overhead line which crosses approximately 2.3 km to the east of the proposed wind farm site.

A single grid connection will be constructed for the proposed project. The GCO constructed is subject to receiving a grid connection offer following EirGrid/ESBN post planning system studies.

Design flexibility was sought as the grid connection cannot be confirmed prior to grant of planning. ACP provided a design flexibility opinion on the 12th November 2025 (ACP case number – 322293-25) regarding the two grid connection options under Section 182G of the Planning and Development Act 2000, as amended and the Planning and Development Regulations 2001, as amended. This opinion was provided in EIAR Appendix 1-3.

It is confirmed that both grid connection options have been considered and fully assessed within the project EIAR.

2.1.2.3 Sensitive Receptors

On page 11 of the KCC submission it notes that there are two Eircodes within 400 m of turbine T10 which are assumed to have a private well.

In response, there are two Eircodes in this location (both within Folio 9122F) for which there are legal agreements in place to purchase. The property owner is financially involved. These properties will not be residential at the time of construction/ operation. Please see solicitor letters from both landowners in Appendix A of the Planning Statement submitted with the application.

2.1.2.4 Construction Environmental Management Plan (CEMP)

The KCC submission makes several comments and suggestions regarding the CEMP. It is of note some of these comments are specifically for the wind farm development works, not the grid connection application, but all are addressed herein as part of the project CEMP.

A CEMP is provided in EIAR Appendix 2-6. As noted within this document, it is a live document and will be reviewed and updated, to comply with the requirements of any planning conditions. Upon appointment, the Contractor for construction of the proposed project shall update the CEMP to produce an updated version (i.e. the Contractor's CEMP) which will account for any requirements set out in planning conditions. This updated CEMP will be provided to KCC for approval before construction commences.



Staff Inductions

In relation to staff inductions, all staff will be inducted before commencing work on site. The CEMP will form part of staff inductions.

Schedule of works

KCC have asked for a more inclusive schedule of works to be included within the CEMP covering both ducting options and noting how Grid Connection Option One will avoid seasonal flooding risk periods.

The project schedule of works sets out the proposed works. If planning permission is granted, the schedule of works will be progressed as part of detailed design, within the parameters proposed as part of the planning application. The updated schedule of works will cover the grid connection option being progressed. Currently the grid connection option is unconfirmed and forms part of the project design flexibility opinion sought. The grid connection option that will be constructed is subject to receiving a grid connection offer following EirGrid/ESBN post planning system studies.

The Flood Risk Assessment (FRA) (see EIAR Appendix 9-3) acknowledges that while the wind farm site itself is not at risk of flooding, certain access routes and local roads associated with the project may be affected during flood events. The assessment identifies both fluvial and pluvial flood extents along sections of the access tracks and Grid Connection Option One. The FRA confirms that where tracks cross watercourses, a Section 50 consent will be required to ensure these crossings are designed so that they do not alter existing hydraulic conditions or contribute to increased flood risk.

The FRA further recognises that construction access should not take place during an active flood event and that temporary flooding along local roads may, on occasion, restrict access to certain parts of the works and access limitations can simply be deferred until floodwaters have naturally receded. In addition, the stormwater drainage design for the project incorporates SuDS measures to maintain greenfield runoff rates, ensuring that the development does not exacerbate existing flooding on surrounding roads or within the site access network.

The FRA demonstrates that flood risk affecting access routes has been appropriately assessed and that the identified mitigation and operational measures effectively address the potential for temporary inundation.

Specific KCC requests

KCC request that proposed buffer zones to protect aquatic zones should be clearly marked in advance of works commencing to preserve their integrity. It is also requested that site compounds or any area designated for maintenance, cleaning, refuelling and repair work of vehicles and machinery must be located at least 50 m of the nearest aquatic zone. It is also requested that buffer zones and methodology to install and manage the same should be included in the CEMP. KCC also request that the CEMP fully detail direction drilling mitigation measures and reclamation process and disposal of bentonite slurry.

There are two temporary construction compounds on the wind farm site in which any maintenance, cleaning, or refuelling will be undertaken. A third temporary construction compound is located along Grid Connection Option One. These are shown in the project



planning drawings and are located at a distance greater than 50 m from the nearest aquatic zone.

The applicant recognises these requests by KCC and will ensure they form part of the CEMP prior to construction works commencing.

Waste Permit

KCC note that a waste permit will be needed for the temporary storage of waste. The applicant is aware of this and confirms they will apply for all necessary permits and licences required.

Risk Assessment Method Statement (RAMS)

KCC has requested that the applicant provides a Risk Assessment Method Statement (RAMS) for the removal of contaminated material in event of a hydrocarbon spill during the construction stage. The applicant commits to preparing a RAMS in advance of site works commencing as these documents also form part of the applicants' own health and safety process and records.

Spoil Management

KCC raised concerns in relation to management of soils including tarmac.

In response there is no tarmac removal from the windfarm site. Any tarmac removed during construction works along Grid Connection Option One will be removed to a permitted facility. Tarmac excavated does not require a waste permit or licence for temporary storage in accordance with the Waste Management Act 1996 as amended.

Soils vary across the wind farm site however there is not a pronounced distinct delineation between the basic and acidic areas due to the deposition history. It is proposed to reuse material on site in accordance with the circular economy principles and the Waste Management Act 1996 as amended. There is a requirement to separate topsoils and subsoils. Soils will be tested in accordance with the EPA Soil recovery protocols.

Dewatering and Ground Water monitoring

KCC suggested continuous turbidity monitoring in the groundwater.

This appears to be a misunderstanding of the risks to groundwater and is likely a reference to surface water monitoring. Turbidity monitoring is proposed for the surface water with details provided in the Surface Water Management Plan (SWMP) (see EIAR Appendix 2-8). Turbidity in groundwater is not a significant risk due to the low permeability and natural filtering effects in the bedrock aquifer.

The potential generation of suspended solids (and therefore elevated turbidity) is a result of construction works and any discharge from the excavations will pass through the surface water management network. Measures are also outlined in the SWMP to prevent the generation of elevated suspended solids at source.

Blasting

KCC queried the need for blasting at the borrow pits. Based on the site investigation, blasting is unlikely to be required at the wind farm site borrow pits. There are no potential significant effects on hydrogeology or hydrology as a results of the borrow pit excavation methods. It is confirmed that no blasting is required for the grid connection application.



Spill kits/ alternative measures

KCC queried the use of spill kits or alternative measures on site. It should be noted that an oil interceptor will be used for the higher risk areas. Low risk areas will be managed in accordance with the Construction Environmental Management Plan. Unsealed pavement (like asphalt) is semi-porous, therefore liquids can quickly soak into the surface. The first step for any spill is to use a standard spill kit to contain and absorb the bulk of the liquid. The proposed procedure is as follows:

- Containment: Absorbent socks or booms are used to circle the spill and prevent it from spreading.
- Absorption: Apply the absorbent materials (like pads, granules) to soak up the hydrocarbons. For spills on unsealed pavement, clay-based or universal absorbents are effective.
- Disposal: The used absorbent material must be swept up and disposed of properly according to waste management regulations.

Site specific refuelling details

Refuelling will be undertaken in dedicated areas on the wind farm site as outlined in EIAR Chapter 9 (Hydrology and Hydrogeology). No refuelling will take place along either grid connection option route.

On the wind farm site it is proposed to install an oil/water separator at the construction compounds and substation prior to discharging to the proposed settlement ponds. The storm water entering this system will include run-off from the refuelling areas and therefore may contain hydrocarbons which require removal. The separator has been sized to cater for 2000 m².

Refuelling with bowser will be undertaken in accordance with the mitigation outlined in EIAR Chapter 9 (Hydrology and Hydrogeology), the Construction Environmental Management Plan and in accordance with HSA guidance on ADR (2025) *Agreement Concerning the International Carriage of Dangerous Goods by Road*².

Forestry clearance and risk of suspended solids as a cumulative impact with wind farm works

Forest felling will be undertaken as part of the construction works. The standards for felling and reforestation describe the universal standards that apply to all felling (thinning, clear felling) and reforestation projects on all sites. The standards will be implemented under a felling licence issued by the Department of Agriculture, Food & the Marine.

In accordance with the Forestry and Water Quality Guidelines (Forestry Service, 2000), buffer zones will be identified and marked out on the ground. These guidelines deal with sensitive areas, erosion, buffer zone guidelines for aquatic zones, ground preparation and drainage, chemicals, fuel and machine oils. Construction activities will be curtailed within the buffer zones in order to reduce erosion and sedimentation and, therefore, to protect surface water quality.

A Forestry Report is included with the application as detailed in EIAR Appendix 2-3.

²https://www.hsa.ie/eng/your_industry/adr_carriage_of_dangerous_goods_by_road/information_guidance



Stream crossings – silt fencing

KCC raises a query in relation to the use of silt fencing. For watercourse crossings on the chosen grid connection option for construction, silt fencing will be erected at the location of watercourse crossings. Installing silt fencing requires proper placement based on the contours, fencing without long runs, heavy gauge (>130 g/m²) porous filter fabric i.e. Terrastop™, posts with proper depth and spacing, and tight soil compaction on both sides of the silt fence. Silt fencing specifications and locations will be mapped prior to works commencing on site and form part of the Contractors Construction Environmental Management Plan.

2.1.2.5 Road Section observations

The KCC submission from the Roads Section outlines the two grid connection option routes proposed. These are illustrated for ease in Figure 1-1 of this response document.

Design flexibility has been sought from An Coimisiún Pleanála (ACP case number 322293-25) for the project grid connection (see EIAR Chapter 1 (Introduction), Section 1.10.1 and the ACP design flexibility opinion in EIAR Appendix 1-3).

Grid Connection Option (GCO) One proposes to install a 110kV underground cable from the proposed onsite substation to the consented Castlebanny Wind Farm 110kV substation approximately 12 km to the north (see Figure 1-1).

GCO Two proposes to connect the onsite substation with the existing 110kV Great Island-Kilkenny overhead line which crosses approximately 2.3 km to the east of the proposed wind farm site (see Figure 1-1).

A single grid connection will be constructed for the proposed project. The GCO chosen for construction is subject to receiving a grid connection offer following EirGrid/ESBN post planning system studies.

Design flexibility was sought as the grid connection cannot be confirmed prior to grant of planning. ACP provided a design flexibility opinion (ACP case number – 32229325) regarding the two grid connection options under Section 182G of the Planning and Development Act 2000, as amended and the Planning and Development Regulations 2001, as amended.

It is confirmed that both grid connection options have been considered and fully assessed within the project EIAR.

It is confirmed the proposed grid connection will not be installed within or attached to any bridge. Horizontal directional drilling (HDD) as discussed and assessed in the EIAR and Grid Construction Methodology Reports (see EIAR Appendix 2-2) will be used to cross under any watercourses. Mitigation measures to address drilling fluid is included in the Natura Impact Statement (NIS) and EIAR Chapter 9 (Hydrology and Hydrogeology).

It is noted that KCC Roads Section have noted that GCO Two (which is included for planning approval in the application) is their optimal solution followed by GCO Four as discussed in EIAR Chapter 3 (Consideration of Reasonable Alternatives).

However, as noted in EIAR Chapter 3 (Consideration of Reasonable Alternatives) following a review of technical and environmental constraints, along with road impacts, GCO One and Two were deemed by the project specialists to be the better options brought forward for planning



approval. Options Three, Four and Five are discussed in relation to GCO One and Two in Table 3-9 from EIAR Chapter 3 (Considerations of Reasonable Alternatives).

EIAR Table 3-9: Potential environmental effects of alternative grid connection options in relation to GCO One and Two

Environmental Considerations	Alternative GCO Three	Alternative GCO Four	Alternative GCO Five
Human Health and Population	There are more residential properties along this route in comparison to GCO One and Two. Greater disturbance effects on local residents living opposite cables works and using the local roads over a distance of approximately 12 km. A new 110 kV substation would also be required bringing this infrastructure type closer to residents.	Increased risk of collision from increased number of staff and machinery working on site and at road entrance for two projects being constructed/ operated concurrently. Increased local disturbance particularly on R704 road as a longer stretch of this road is needed to lay cables than in GCO One. GCO Two works are within the wind farm site.	There are more residential properties along this route in comparison to GCO One. Greater disturbance effects on local residents living opposite cables works. Air, noise, traffic effects would be greater along this route including for people visiting St Moling's Well. GCO Two works are within the wind farm site and therefore not passing residential properties.
Biodiversity	Similar potential impacts in comparison to GCO One and more than GCO Two due to the level of works required over approximately 12 km. Greater impact than GCO One and Two due to required land take required for a new 110 kV substation.	Greater potential ecological impacts in comparison to GCO One and Two as additional lands (including broadleaved woodland, conifer/ wet heath habitats) would be required for cables and habitats disturbed / removed.	Neutral in comparison with GCO One and GCO Two.
Land, Soils and Geology	Greater potential disturbance impacts in comparison to GCO One and Two due to the level of works required for approximately 12 km and land take required for developing a new 110 kV substation.	Greater potential impacts as there would not be available space for the cables within the internal site roads. Therefore, more land take would be required and soils disturbed.	Neutral in comparison with GCO One and GCO Two.
Hydrology and Hydrogeology	Greater potential disturbance impacts in comparison to GCO One and Two due to the level of works within several public roads for approximately 12 km and land take required for developing a new 110 kV substation.	This option crosses two streams in comparison to GCO One which has four additional crossings along the R3418 road. No instream works are planned for the project. Neutral in comparison with GCO Two.	Neutral in comparison with GCO One and GCO Two.
Visual Impact	Greater visual impact in comparison to GCOs One and Two as a new standalone	A decrease in visual effect in comparison to GCO One as the works would not directly	Neutral in comparison with GCO One and GCO Two.



	110 kV substation would be required.	pass any residential properties. Neutral in comparison with GCO Two.	
Noise and Vibration	Numerous residential properties border these roads. A new 110 kV substation would also be required bringing this infrastructure closer to residents causing greater impacts in comparison to GCOs One and Two.	A decrease in visual effect in comparison to GCO One as the works would not directly pass any residential properties. Neutral in comparison with GCO Two.	This route passes more residential properties along public roads in comparison to GCO One therefore more noise disturbance is likely. GCO Two works are within the wind farm site and therefore not passing residential properties.
Cultural Heritage	This route would pass numerous archaeological features and therefore have a potential greater impact. A new site is required for new 110 kV substation and potentially would impact or be closer to archaeological features.	Neutral in comparison with GCO One and GCO Two.	This route passes St Moling's Well, a recorded holy well. Disturbance effects would be likely to people visiting this recorded site. GCO One and Two do not pass St Moling's Well.
Traffic	Similar potential impacts to GCO One due to the level of works within several local roads for approximately 12 km and less than GCO Two which is within the wind farm site. A new site is required by this option for a new 110 kV substation which would increase traffic levels in this area. GCO One and Two do not need an additional substation site.	This GCO would cause greater traffic effects in comparison to GCO One & Two on the R704 road as the cables are constructed within the road from Three Friars Cross to the proposed Castlebanny Wind Farm site entrance.	This route passes more residential properties than GCO One therefore more local traffic disturbance is likely. It involves cable laying works and road closures to five roads within the local area. GCO Two works are within the wind farm site and therefore not passing residential properties or using public roads.

Ultimately the grid connection option constructed (should a planning grant be received) is subject to receiving a grid connection offer following EirGrid/ESBN post planning system studies.

2.1.2.6 Road Section Recommendations

The KCC submission on pages 14-16 suggests a number of recommendations. These are presented in the table below along with the Applicant response to each. In the event of a dispute regarding proposed works within the road network, the issue can be referred back to ACP for a resolution.



KCC Recommendation	Applicant Response
<p>The public road network is of limited capacity and grid connection installations risk restricting or sterilising the road network for future development. Impacts the Road Authority in terms of its ability to carry out its functions in respect of maintenance works and future services provision.</p>	<p>This is acknowledged by the Applicant.</p>
<p>Recommendation of Road Design Section that Grid Connection Option (GCC) Two be designated as the permitted option for the proposed development as GCO Two is located within the development lands and no interface with public road network, as proposed grid connection from the substation to the 110kV overhead lines is contained within the development site as part of a loop in-loop out arrangement. Considered by Road Design Section to be “optimal solution “ from road infrastructure perspective.</p>	<p>As noted in the EIAR and Section 2.1.2.5 of this Submission Response, the grid connection cannot be confirmed by the Applicant pre planning approval and design flexibility has been sought.</p> <p>A single grid connection will be constructed for the proposed project.</p> <p>The grid connection option constructed is subject to receiving a grid connection offer following EirGrid/ESBN post planning system studies.</p>
<p>Should an alternative option be approved it is recommended that GCO Four is further developed to minimise impact on public road network in lieu of proposed Option GCO One.</p>	<p>As above.</p>
<p>Prior to commencement of construction works, the applicant shall be conditioned to submit a detailed construction programme for the grid connection development which shall comprise a detailed traffic impact assessment for the construction phase including details of anticipated traffic types and volumes for development which should be provided broken down in daily, weekly, and monthly figures. Details should also Include expected peak site traffic, day to day hours and duration.</p>	<p>This is acknowledged by the Applicant.</p>
<p>Applicant shall be conditioned to conduct Pre and Post construction condition surveys of roads affected by works and construction haul routes in accordance with the "Pavement Survey Standard for Regional and Local Roads" in consultation with Municipal District Office. Proposals to upgrade a road or structure shall be provided where it is shown to be structurally unsuitable and/or where excessive damage to public road(s) is identified based on the Pre and Post surveys.</p>	<p>This is acknowledged by the Applicant.</p>
<p>Applicant shall be conditioned to develop Construction and Traffic Management Plan for duration of the project for construction phase as part of Construction Environmental Management Plan (CEMP). This is a live working document, and the applicant will be required to prepare an updated environmental, construction and traffic management plan for the construction phase which shall be submitted to the Municipal District Office prior to commencement of development works for</p>	<p>This is acknowledged by the Applicant.</p>



<p>agreement. The Construction Traffic Management Plan is also considered a live working document and shall be amended where required as project progresses and shall reflect any changes to construction and staffing traffic patterns during work phases or arising from Health and Safety Audits.</p>	
<p>The applicant shall be conditioned to comply with the guidelines as set out in the "Interim Guidance to Road Authorities regarding the proposed placement of Medium or High Voltage electricity assets, including ducts, cables, and associated infrastructure under public roads " and in particular the requirements set out in Section 7 and Section 8, unless where modified by the following:</p>	<p>This is acknowledged by the Applicant.</p>
<p>With respect to trenching detail for cable installation, concerns regarding vertical clearance from road surface to proposed ducting. Proposed construction detail potentially limits the vertical clearance for the installation of other services, drainage improvement and maintenance. Applicant shall be conditioned to submit revised typical trenching details following consultation with Municipal District Office, which shall address the appropriate clearances to facilitate future maintenance works. Detail of the backfill arrangements and materials shall also be reviewed to ensure that significant lengths of linear hard strips of concrete backfill do not adversely affect pavement substructural lateral drainage paths.</p>	<p>This is acknowledged by the Applicant.</p>
<p>Principles of the duct installation in verges, wheel track or road centres and the associated road restoration requirements, particularly in protected roads shall be developed and agreed in principle in consultation with the Municipal District Offices. Interim Guidance to Road Authorities regarding proposed placement of Medium or High Voltage electricity assets, including ducts, cables, and associated infrastructure under public roads has been provided by the Department of Transport (Ref: Circular RW 07 of 2025 dated 14 March 2025). Kilkenny County Council notes guidance indicates depth of cover to the Transmission HV cable duct(s) should be no less than 950mm to top of cable unless agreed otherwise in specific circumstances.</p>	<p>This is acknowledged by the Applicant.</p>
<p>Having regard to interim guidance, further particular requirement of Kilkenny County Council that minimum depth requirement of 950mm shall apply to all associated grid connection service ducting including telecommunications and ECC (Earth Continuity Conductor) ducts unless otherwise agreed with the Local Authority.</p>	<p>This is acknowledged by the Applicant and liaison with KCC will take place to agree depths.</p> <p>The project currently has 750mm to top of ECC and Telecommunications ducts and 950mm to top of HV ducts.</p>
<p>Applicant shall be advised that due to width of the proposed trench and the existing local road widths that full road reconstruction may be required over the full local road carriageway. Applicant shall be conditioned to</p>	<p>This is acknowledged by the Applicant.</p> <p>The Applicant proposes to construct (cut/backfill/tar the trench) as per EirGrid requirements and as per recent KCC</p>



<p>carryout full assessment of existing road drainage network to ensure that proposed works do not adversely impact drainage. Works to maintain or improve drainage networks shall be agreed with relevant Municipal District Office;</p>	<p>requirements for example on the Castlecomer Solar Farm project, Co. Kilkenny (see Plate 2-1 below).</p>
<p>With respect to the joint pit chambers, noted that Kilkenny County Council's preference for chambers to be located in third party lands. In the event chambers are located in public road, the vertical clearance distance from the finished road/verge level to the top of the pit walls shall be reassessed to ensure adequate space for maintenance of the pavement structure and no less than 600mm below finished road level. Technical Acceptance of joint bay structures beneath regional and or local roads and which do not interface with national roads should be carried out in accordance with DOT Circular RW 10/2021. Integral to the Technical Acceptance procedure is the: Technical Acceptance Report (TAR) which records the agreed basis and criteria for detailed design of joint bay structure; and; Certification by Design/Assessor/Checker confirming that the design, assessment, specification or construction works complies with the TAR.</p>	<p>This is acknowledged by the Applicant.</p>
<p>Where structures including culverts are located within public road, applicant shall be conditioned to carry out a structure/bridge specific design report on structural condition at each of identified bridges/structures and determine how cable installation will impact the structure and to assess how directional drilling, where approved, will affect the individual bridge or structure due to the unique ground conditions under it. Shall be carried out by Chartered Engineer with bridge and geotechnical experience. Clearance depth of any thrust-bores, where approved, under structures, watercourse beds shall be such as to ensure that there is no adverse impact or settlement of structure or watercourse bed. Each design shall be submitted to the Local Authority for consideration and approval. Applicant shall be required to consult with the Bridge Maintenance Engineer of Kilkenny County Council in relation to all affected structures on road network having regard to Kilkenny County Council's preference in the first instance that cabling should not be installed within the bridge structure envelope and should be constructed offline to preserve existing structures and to facilitate unrestricted access for maintenance in the future. Costs of any design review requiring independent assessment by Local Authority shall be recouped from applicant. The design review shall inform whether any bridge remedial works, structural or otherwise, are required in advance of cable installation\works.</p>	<p>This is acknowledged by the Applicant.</p>



Plate 2-1: Castlecomer road completion works



2.1.2.7 Road Opening Licences

The KCC submission on pages 16-17 suggests a number of recommendations with regards to road opening licences. These are presented in the table below along with the Applicant response to each.

KCC Recommendation	Applicant Response
This application notes that the installation of the grid connection will be subject to Road Opening Licence process which is managed by Local Authority.	All necessary Road Opening Licences and agreements will be obtained prior to commencement of works.
It is noted that, subject to approval, applicant shall be required to enter into individual Licence Agreement with Kilkenny County Council for facilitation of the laying, installation and maintenance of conduits or cable for the conveyance of services within structures and public road as Kilkenny County Council will not be responsible for costs associated with future relocation or protection of cable routing and infrastructure arising from the carrying out of its duties and functions in respect of the maintenance and operation of public roads.	This is acknowledged by the Applicant.



<p>Furthermore, the risk of being unable to obtain a Road Opening Licence, arising from a lack of capacity in road network due to other potential grid connection installations, or where the local authority is not in a position to grant structure agreement licences for construction methodologies in envelope of structures, is noted.</p>	<p>The Applicant is unaware of any other grid connection installations within the required roads or being crossed by the proposed project.</p> <p>Where there is a shortage of capacity or space is limited within the public road network, the Applicant will design a detailed civil and electrical technical solution that is consistent with the system operators requirements and in consultation with KCC.</p> <p>All bridge structures to be crossed by the grid connection will be done so using horizontal directional drilling to preserve the integrity of the structures. This is detailed within the EIA assessments, EIA Appendix 2-2 Construction Methodologies, and shown on submitted Planning Drawings 1262 and 1263.</p>
<p>As previously noted, the applicant shall take into consideration particular requirements of Kilkenny County Council in respect of duct and trench installation, backfill and reinstatement details and minimum depth of cover to all service ducts when applying for Road Opening Licence.</p>	<p>This is acknowledged by the Applicant and liaison with KCC will take place to agree depths.</p> <p>The Applicant proposes to construct (cut/backfill/tar the trench) as per EirGrid requirements and as per recent KCC requirements for example on the Castlecomer Solar Farm project, Co. Kilkenny (see Plate 2-1).</p>
<p>A Road Opening Licence shall be required in respect of works affecting the public road.</p>	<p>This is acknowledged by the Applicant.</p>

2.1.2.8 Archaeology

The submission from KCC recommends that all groundworks will be monitored under archaeological licence and supervision with condition reference no. 3 within the archaeology section of the October 2022 OPR Practice Note PNO3 Planning Conditions to be adhered to. Archaeological monitoring of topsoil stripping across the proposed project is included as a mitigation measure in Chapter 15 (Archaeology and Cultural Heritage) of the submitted EIA.

2.1.3 Transport Infrastructure Ireland (TII)

The TII submission has been reviewed and the applicant is in agreement with the recommendations made. We have no further comment.

2.1.4 Uisce Eireann

Uisce Eireann have included two recommendations within their submission to ensure adequate protection to water facilities. The applicant is in agreement with these recommendations.



2.2 THIRD PARTY SUBMISSIONS

Within the third party submissions the concerns and themes have been reviewed and are addressed within the relevant sections herein.

2.2.1 Design Flexibility

A submission by Annerose Schichhold and Family highlights that the application is seeking planning permission for two different grid connections and that the proceeding option will not be selected until after planning approved. Therefore, the submission states that this lack of certainty significantly limits the ability to properly assess environmental, landscape and community impacts.

In response, the submission is correct in the fact two grid connection options have been applied for through Section 37CC of the Planning and Development Act, 2000, as amended.

Design flexibility has been sought from An Coimisiún Pleanála for the project grid connection (see EIAR Chapter 1 (Introduction), Section 1.10.1 and ACP's design flexibility opinion in EIAR Appendix 1-3). Two options for the grid connection are considered to connect the proposed project to the national grid (see Figure 1-1).

GCO One proposes to install a 110kV underground cable from the proposed onsite substation to the consented Castlebanny Wind Farm 110kV substation approximately 12 km to the north.

GCO Two will connect the onsite substation with the existing 110kV Great Island-Kilkenny overhead line which crosses approximately 2.3 km to the east of the proposed wind farm site.

A single grid connection will be constructed for the proposed project. The GCO constructed is subject to receiving a grid connection offer following EirGrid/ESBN post planning system studies.

Design flexibility, as described above and discussed with An Coimisiún Pleanála at our project design flexibility meeting (ACP case number –322293-25) on the 26th May 2025, was sought as the grid connection cannot be confirmed prior to grant of planning. This is the purpose of Section 37CC (i.e. to facilitate the identification of details which are not confirmed at the application stage for large projects and to provide design parameters and associated assessment in respect of those). The provision of parameters, and the assessment of the likely significant effects of the various permutations within them allows ACP to undertake robust EIA and assess the full range of impacts, and reach a reasoned EIA conclusion.

It is confirmed that all likely significant effects arising from the two proposed grid connection options have been fully assessed in the EIAR so there is sufficient information provided for ACP to make a decision. This approach has also been deemed appropriate by ACP as per their decision to grant the request for design flexibility on November 12th 2025 (see EIAR Appendix 1-3).

2.2.2 Decommissioning and Drainage

Concern was raised into the decommissioning plans which suggest that site drainage works will be upgraded during decommission works however the nature of this upgrading works is unclear. It is confirmed there is no proposed decommissioning for the permanent grid connection which will form part of the national grid.



2.2.3 Hydrogeology and hydrology – Private well queries

Queries were raised in relation to private wells and the potential for contamination. Due to the nature of the Grid Connection Option One within the carriageway of public roads no potential effects are anticipated along the cable route due to the limited scale of works within the public road. No wells were identified within 100 m of the offroad section.

The aquifer potential of a bedrock unit is determined by the groundwater productivity, which in turn is determined based on hydraulic characteristics compiled from borehole data throughout the country. The GSI categorises the aquifer bodies into Regionally Important Aquifers, Locally Important Aquifers and Poor Aquifers.

As detailed in the EIR Chapter 9 (Hydrology and Hydrogeology), the proposed project is underlain by a poorly productive bedrock and short flow paths. The proposed wind farm is predominantly underlain by a Poor Aquifer - Bedrock which is Generally Unproductive except for Local Zones and partially by a Locally Important Aquifer (LI) - Bedrock which is Moderately Productive only in Local Zones. The subsoil deposits overlying the bedrock are not considered to be of sufficient lateral extent or depth to represent a significant aquifer body. Depths required for the Grid Connection Option One are shallow and utilise standard trenching methods (with some short sections having HDD or flat formation) and will not result in direct or indirect adverse effects on private wells. The trench within the road is similar to other utility installations. The standard trench is 825 mm wide, 1315 mm deep. Each 250 m of trench will be completed at a time and therefore the excavation is limited in extent and temporally. There were no likely significant effects on wells or hydrogeology identified as a result of excavations along the proposed grid connection.

The main source of contamination for groundwater wells is local contamination from septic tanks and agriculture. These sources introduce harmful bacteria, viruses, and nitrates into groundwater, which can then enter poorly protected wells. The minimum recommended distance between a wastewater treatment system and well varies from 15 m to 60 m depending on the slope and soil type and is set out in the Code of Practice for new builds - Site suitability assessment³. The proposed grid connection options do not have a proposed septic tank and will not significantly alter agricultural practices.

2.2.4 Requirement for a Comprehensive Schedule of Works Demonstrating Seasonal Flood Risk Avoidance for Grid Connection Option One

The Flood Risk Assessment (FRA) (see EIR Appendix 9-3) acknowledges that while the wind farm site itself is not at risk of flooding, certain access routes and local roads associated with the project may be affected during flood events. The assessment identifies both fluvial and pluvial flood extents along sections of the access tracks and Grid Connection Option One, noting that although turbine and substation locations have adequate freeboard and lie outside mapped flood zones, some portions of the access infrastructure intersect areas classified as flood-prone within the PFRA datasets. The FRA confirms that where tracks cross watercourses, a Section 50

³ <https://www.epa.ie/environment-and-you/drinking-water/faqs/>



consent will be required to ensure these crossings are designed so that they do not alter existing hydraulic conditions or contribute to increased flood risk.

The FRA further recognises that construction access should not take place during an active flood event and that temporary flooding along local roads may, on occasion, restrict access to certain parts of the works. However, given the low maintenance requirements associated with the operational wind farm, any temporary access limitations can simply be deferred until floodwaters have naturally receded. In addition, the stormwater drainage design for the project incorporates SuDS measures to maintain greenfield runoff rates, ensuring that the development does not exacerbate existing flooding on surrounding roads or within the access network.

The FRA demonstrates that flood risk affecting access routes has been appropriately assessed and that the identified mitigation and operational measures effectively address the potential for temporary inundation, even though the development site itself remains outside areas susceptible to flooding.

2.2.5 Requirement for a Detailed Schedule of Works Demonstrating Seasonal Flood Risk Avoidance for Both Ducting Options, Including Specific Measures for Option One Near the River

The Flood Risk Assessment (FRA) acknowledges that elements of the grid connection, specifically Grid Connection Option One (GCO One), intersect areas identified within PFRA mapping as being subject to fluvial flood extents. In doing so, the FRA explicitly states that construction works in these locations should not be undertaken during a flood event, thereby establishing an avoidance-based approach to construction in flood-prone areas. This requirement confirms that works within the flood-affected sections of GCO One must be scheduled for periods when flood conditions are not present.

In addition to these avoidance measures, the FRA identifies that all watercourse crossings associated with access routes or cable routes will be required to obtain Section 50 consent. This regulatory process ensures that the design, timing and methodology of any in-channel or near-channel works comply with OPW standards, including the requirement that both the soffit level and construction approach do not interact with elevated river levels. Where Horizontal Directional Drilling (HDD) techniques are used, these further avoid direct in-channel disturbance and reinforce the need for timing that aligns with periods of low hydrological risk.

Although the FRA does not provide a fully detailed schedule of works or specify seasonal timing windows, the combined requirements: to avoid undertaking works during flood events, to comply with OPW constraints imposed through Section 50 approval, and to employ construction methodologies that are sensitive to water level conditions, mean that the final construction programme for the ducting option and access to site must inherently be aligned with periods when flooding is not anticipated. Accordingly, the FRA already establishes that the implementation schedule for both ducting options will need to be compatible with flood-risk-dependent timing constraints and will necessarily avoid high-risk seasonal periods as part of the consenting and design process.



2.2.6 Grid Connection Excavated Material Management

Concerns are expressed regarding the management of excavated material during the construction of the grid connection and the potential for mud slides.

In response, the grid connection construction methodologies are presented in EIAR Appendix 2-2. As noted within the grid connection construction methodologies:

- Works will be supervised by the contractors site management team and other relevant stakeholders at all times.
- Trenching works will be undertaken in a manner to ensure that no more than circa. 250 m sections of trench is opened at any one time.
- No spoil shall be stored within 50 m of any watercourse.
- Cabins, containers, workshops, plant, materials storage and storage tanks shall not be located near any surface water channels and will be located beyond the 50 m hydrological buffer at all times
- At watercourse crossings, the contractor will be required to adhere to the environmental control measures outlined within the EIAR, the CEMP and best practice construction methodologies.
- If dewatering is required as part of the proposed works e.g. in trenches for underground cabling or in wet areas, water must be treated prior to discharge.
- Where the grid connection intersects with culverts or other services, the culvert or service will remain in place (where possible) and the ducting will be installed either below or above the culvert to provide minimum separation distances in accordance with EirGrid and the relevant service providers specifications.
- In the event that a culvert require temporary removal or replacement during ducting installation due to its condition, it is proposed that a suitable method of damming the water source and pumping the water around the work area will be deployed as outlined in Section 5.4 and agreed with the relevant stakeholders. Once the ducts are installed the culvert will be reinstated to match existing levels and dimensions. If works of this nature are required, the contractor will liaise with Inland Fisheries Ireland in advance of works.

Any excavated material will be removed to a dedicated deposition area each day (see temporary deposition locations and compounds shown on the project planning drawings). No excavated materials will be left on the road to cause mud nuisance or slides. These deposition areas have been selected due to their location to the proposed works and are positioned at a distance greater than 50 m to a watercourse. As noted above trenching works will be undertaken in a manner to ensure that no more than circa. 250 m sections of trench is opened at any one time limiting the amount of material being excavated at any one time. The Construction Environmental Management Plan (EIAR Appendix 2-6) also contains procedures for dealing with complaints, such as mud or dust on roads, from members of the public should one arise.

2.2.7 Community Engagement

Several submissions raised concerns regarding the lack of or inadequate public consultation. Public consultation is detailed in EIAR Section 1.10.5 and a Community Engagement Report detailing the consultation process is included as EIAR Appendix 1-7. Please refer to pages 12-17 of the Community Engagement Report which summarises the community engagement process



which took place from December 2024 to December 2025. Post planning submission, the two designated Community Liaison Officers remain available on the ground as key points of contact should any queries arise.

A public consultation clinic (held on the 11th of November 2025) was selected over a town hall event because previous team experience has shown that these are more effective at fostering widespread participation and allowing everyone an opportunity to speak (rather than a few people, including non-residents, taking over the floor) and get their concerns voiced with the applicant team members. Everyone that sought a meeting with the applicant at the public clinic was accommodated.

The public consultation clinic was held in Belview Port which is involved in the proposed project as the port location to where the turbines will be delivered and the beginning of the project turbine delivery route. Belview Port also has suitable parking and facilities for holding such events.

During the construction phase, communication with local stakeholders will be maintained regarding planned construction activities and traffic management measures. Advance notice will be provided where significant deliveries or temporary traffic management measures are required, ensuring that local residents and road users are informed of construction activities.

2.2.8 Radon and Air Quality

Concern was raised over potential radon impacts during the construction phase particularly digging for the project infrastructure. Section 14.2 of Chapter 14 (Air Quality and Climate) of the EIAR assesses impacts of the proposed project with the potential for significant effects on air quality. These impacts include construction dust during the construction phase and the savings of nitrogen oxides (NO_x) emissions due to the displacement of power generation from fossil fuels by the renewable electricity produced by the proposed project. The assessment concluded that there are no significant effects on air quality associated with these impacts. There are no other impacts with the potential for significant effects on air quality associated with the proposed project.

The impact of radon release due to the construction works associated with the proposed project will not have a significant effect on air quality, as it is only considered a significant risk to human health in confined spaces such as homes or workplaces^{4,5,6}, where it is then readily controlled via heavy duty plastic radon membranes. There is no significant risk to human health as a result of radon exposure out in the open due to atmospheric dispersion and natural ventilation^{4,7}, and the proposed project will not result in an increased risk of exposure in existing properties in the vicinity of the project.

2.2.9 Greenhouse gas (GHG) emissions and savings

The carbon footprint associated with the proposed project was queried.

⁴ Geological Survey of Ireland (<https://www.gsi.ie/en-ie/geoscience-topics/environmental-health/Pages/Radon.aspx>)

⁵ EPA (2024) Ionising Radiation National Dose Report

⁶ Benà, E. et. al (2025) From collective to individual radon risk exposure: An insight into the current European regulation. Environment International, Volume 196, <https://doi.org/10.1016/j.envint.2025.109264>.

⁷ Dublin City Council (2026) Radon Information for Homeowners, Builders, and Employers. <https://www.dublincity.ie/construction/building-control/radon-information-homeowners-builders-and-employers>



The project grid connection was considered in the EIAR as part of the overall proposed project. Section 14.3 of Chapter 14 (Air Quality and Climate) of the EIAR assesses the climate and the potential greenhouse gas (GHG) emissions during the construction, operational and decommissioning phases of the proposed project (also known as a carbon balance assessment). It also assesses the offsetting of GHG emissions through renewable electricity generation, which will contribute to reducing national GHG emissions and Ireland's reliance on fossil fuels. This assessment takes into account the grid connection, which is required to deliver this renewable energy to the national grid and is therefore considered essential enabling infrastructure for renewable energy production.

The methodology for quantification of GHG emissions associated with the proposed project is detailed in Sections 14.3.3.1.1 of Chapter 14 (Air Quality and Climate), and describes the sources of GHG emissions during the construction, operational and decommissioning phases of the proposed project. The primary sources of GHG emissions associated with the proposed project include:

- Materials and staff required during the construction period and their associated transport. Details of vehicle movements are provided in Chapter 16 (Traffic and Transportation) and are incorporated into the GHG assessment as part of Chapter 14 (Air Quality and Climate).
- The GHG emissions associated with the manufacture of the wind turbines themselves have been considered in the GHG assessment as follows. Due to the flexibility sought regarding the range of design parameters associated with the wind turbines for the proposed project the make and manufacturer of the turbines to be installed has not yet been decided at this stage of the project and will be decided post consent should permission be granted. As a result, indicative information from Life Cycle Assessments (LCAs) from various wind turbine manufacturers (based on experience of similar projects and publicly available information from manufacturers such as Nordex and Vestas) has been considered in the GHG assessment.
- These LCAs are produced by the manufacturer at one specific site for specific turbine models, and consider variables such as project lifespan and local wind conditions. An LCA is not produced by the manufacturer on a project by project basis i.e. not for this proposed project. The GHG emissions are typically presented as an overall value, and detailed information for each stage is not provided. It is therefore not possible to extract only the relevant elements (such as materials for the turbines) for the proposed project and incorporate them quantitatively into this assessment. However, LCAs do provide an indication of the payback period for the turbines, which ranges from 5-8 months based on the LCAs reviewed. The proposed project is therefore expected to offset the GHG emissions associated with the turbine manufacture in a similar time frame. This has been considered qualitatively as part of GHG assessment for the proposed project.
- Changes to forestry area as part of site clearance (including along GCO One) and excavation works during construction. The total area of forest and the methods by which it will be affected are described in EIAR Appendix 2-3 and are incorporated into the GHG assessment as part of Chapter 14 (Air Quality and Climate).
- The GHG emissions associated with the construction and decommissioning phases are overall short term in nature, due to the length of the phases and the activities involved (e.g. material manufacture and site clearance).



As noted above, the grid connection is considered part of the overall proposed Ballyfasy Wind Farm project assessed within the EIAR. The 57-72 MW capacity wind turbines assessed for the purposes of the GHG assessment will contribute to the Climate Action Plan 2025 (CAP25) key targets of producing 80% of energy from renewable sources by 2030. CAP25 is a statutory road map of actions necessary for Ireland to comply with legally binding economy-wide carbon budgets and sectoral GHG emissions ceilings. Without the actions identified by CAP25 (and future CAPs), Ireland will not meet its national climate objective of “*pursuing and achieving, by no later than the end of the year 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy*”. Decarbonising energy production will not be achieved by a single form of renewable energy production, and will require a variety of technologies, including wind turbines and associated grid infrastructure. Meeting the 80% renewable energy production target will require at least 9 GW of onshore wind capacity, 8 GW of solar capacity, 5 GW of offshore wind capacity and 2 GW of new flexible gas plant. Onshore wind energy production and its associated grid infrastructure is a large component of meeting the 80% renewable energy target, and the proposed development is therefore fully aligned with national climate policy.

The proposed project will offset GHG emissions (both its own and total national emissions) during its operation. This offset is primarily due to the renewable electricity generated by the wind turbines over the 35 year lifespan of the proposed wind farm development.

The GHG emissions offset from the operation of the wind turbines (approx. 52,606 tonnes of CO₂ equivalent (tCO₂e)) as well as the construction and decommissioning phase emissions (approx. 11,533 tCO₂e from materials, change in forestry area, site clearance and excavation and energy use) associated with the project (turbines and grid connection), and the alignment of the proposed development with Ireland’s trajectory to net zero by 2050 and CAP25 are taken into account in determining the significance of effect of the proposed development on climate. The annual GHG operational emissions offset (which has taken the construction phase emissions into account) from the proposed project is equivalent to 1.8% of the total carbon budget for the electricity sector in 2030 i.e. the proposed project has the potential to reduce Ireland’s GHG emissions in this sector by this percentage.

The proposed project is therefore predicted to have a direct, long term, positive and slight effect on climate, which is overall not significant in Environmental Impact Assessment terms.

2.2.10 Noise and Vibration

Third party submissions that had comments or raised issues relating to noise and vibration are addressed here.

Several observations highlighted concerns regarding the impacts of noise during the construction phase of the proposed project.

Section 12.4.2.5.1 of the EIAR presents a detailed assessment of the potential effects of noise and vibration during the construction phase of the proposed Grid Connection Options (GCO). The EIAR confirms that for all elements of the GCO construction, the likely significant effects are temporary and classified as ‘Not Significant’, with predicted impacts remaining within the recommended threshold and limit values contained in the best practice guidelines presented in Section 12.1.7.1 of the EIAR.



It is acknowledged that construction noise will be audible at some Noise Sensitive Locations (NSLs). The following statement is reiterated from Section 12.6.1 of the EIAR:

'During the construction phase of the proposed project, there will be some impacts on nearby NSLs due to noise emissions from site traffic and other construction activities. However, given the distances between the main construction works and the NSLs, the short-term duration of the construction phase, and the assessment's findings that the expected noise and vibration emissions will be below the identified threshold and limit values, the impacts will not be significant.'

In conclusion, the EIAR demonstrates that while the short-term construction noise associated with the grid connection may be audible at certain NSLs, the predicted levels remain within acceptable thresholds. With the implementation of best practice mitigation measures as per Section 12.5.2 of the EIAR, the likely associated impacts are not significant, ensuring that the construction phase can proceed without undue adverse effects on nearby NSLs.

2.2.11 Electromagnetic Interference

Concern regarding electromagnetic interference and potential health implications was mentioned in a few submissions.

Electromagnetic Fields (EMF) together with optical radiation, which includes infrared (IR), visible light (and laser), and ultraviolet radiation, collectively make up the non-ionising radiation (NIR) spectrum. This type of radiation does not have enough energy to break up (ionise) atoms or molecules. It is therefore different to ionising radiation such as X-rays or radioactive substances, that can break up molecules and is known to cause damage to human cells.

EMF are generated by everyday items such as mobile phones and electrical appliances. EMF are intentionally produced and used to transmit information or to heat things such as food. So, we use EMF every time we listen to the radio, watch television, warm up food in a microwave oven or use our mobile phone. EMF are also generated when electricity is produced (e.g., power plants) and distributed (e.g., power lines), and whenever we use an electric appliance at home or in work. EMF sources also occur in nature and include the earth's magnetic field, that causes compasses to point North, or the electric fields produced in the atmosphere during lightning storms. EMF are also emitted by the Sun and even by our own bodies.

Electromagnetic Compatibility (EMC) relates to the ability of different electromagnetic devices to function properly when they are situated in the same environment, i.e., it relates to the compatibility between different devices. Electromagnetic devices can generate and propagate energy causing electromagnetic interference (EMI). Devices can also receive and be interfered with by energy generated and propagated by other devices in the same environment. If an electromagnetic device is not compatible with other devices in the same environment, EMI can lead to the device not functioning properly.

2.2.11.1 Guidelines

The EU Council 'Recommendation on the limitation of exposure of the general public to electromagnetic fields' (0Hz to 300GHz) 1999/519/EC outlines a set of both 'reference' and 'restriction' levels for limiting overall exposure to electromagnetic fields and ensuring an increased level of protection.



This recommendation is based on the International Commission on Non-Ionising Radiation Protection ‘Guidelines for limiting exposure to time-varying electric, magnetic, and electromagnetic fields (up to 300GHz)’. Health Physics 74 (4): 494-522; 1998.

The electric and magnetic fields associated with Ireland’s transmission grid do not exceed the recommendations of EU1999/519/EC.

EirGrid, who is responsible for Ireland’s electricity grid operates to stringent safety recommendations set out by the EU as well as national and international agencies. These recommendations are based on peer-reviewed medical and health studies, independent of any grid operator.

EirGrid has reviewed the current and voltage of every transmission circuit in the country every hour for a year. These averages were then used to determine the typical electric and magnetic fields near our lines. The results are shown in Table 2-1 herein and on EirGrid’s website⁸.

Magnetic flux densities for AC magnetic fields are reported using units of microtesla (μT) and AC electric fields are reported as Volts per metre (V/m).

Table 2-1 shows that the restriction level for electric fields is 9000 V/m. With regards to 110kV cables the result is negligible. Table 2-1 also shows that the magnetic field restriction level is 360 μT , whereas 110kV cables is 11.53 μT when standing directly above the circuit. This is still well below the 360 μT restriction level.

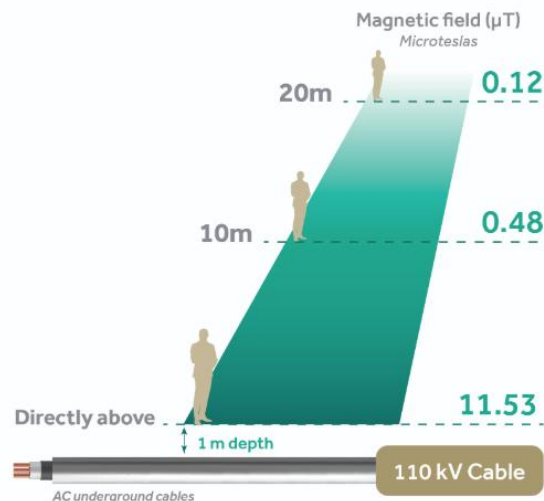
Table 2-1: Electromagnetic Fields in Ireland (Source: <https://www.eirgrid.ie/EMF>)

Type of field	EU/ICNIRP restriction level	Highest level calculated for 400 kV	Highest level calculated for 220 kV	Highest level calculated for 110 kV
Electric field (V/m)	9,000	N/A	N/A	N/A
Magnetic field (μT)	360	43.27 (1m above the ground directly above the circuit)	30.74 (1m above the ground directly above the circuit)	11.53 (1m above the ground directly above the circuit)

It is also important to note that the strength of both magnetic and electric fields drops significantly with distance (away from the source) as shown in the image below. Standing directly above the cable has a 11.53 μT magnetic field (below recommended restriction levels) which significantly reduces further to 0.48 μT at a distance of 10 m.

⁸ <https://www.eirgrid.ie/EMF>





As described in EIAR Chapter 5 (Population and Human Health), the proposed underground electrical cables will adhere to the international guidelines for ELF-EMF (Extremely Low Frequency Magnetic Field) which are described by the International Commission on Non-Ionizing Radiation Protection (ICNIRP). This is a formal advisory agency to the WHO. The proposed wind farm will also adhere to the EU guidelines for human exposure to EMF (Electric Magnetic Field). As the ICNIRP guidelines will not be exceeded, even directly above the underground cables, there will be no associated operational effects on Human Health.

2.2.11.2 Pacemaker Interference

“The likelihood of an adverse impact to a pacemaker or other implanted cardiac device from a power line is extremely small given the low levels of electric and magnetic fields typically measure so close to the line, where the fields would be highest”.⁹ As noted in Table 2-1, the levels associated with a 110kV cable which is proposed for this project, are well below the guidance thresholds when standing above, decreasing further with distance.

110kV cables and overhead lines are also located through Ireland and generally are not considered to pose a risk to pacemakers, as EMF levels around such infrastructure are within international safety guidelines. Also modern implanted cardiac devices are equipped with multiple design features and internal circuitry specifically engineered to mitigate electromagnetic interference.

2.2.11.3 Risk of Cancer

As outlined in Chapter 5 (Population and Human Health) of the EIAR, guidance from the World Health Organisation (WHO) notes that electromagnetic fields (EMF) are sometimes cited in relation to potential health effects, including childhood leukaemia, brain tumours, and other cancers (WHO, 2007). However, laboratory experiments have provided no reliable evidence that EMF exposure causes cancer, nor do human epidemiological studies indicate that they cause cancer in general. The UK Health Promotion Agency stated, in November 2007, that “there is little scientific evidence to support these claims, and the current body of evidence does

⁹ <https://www.eirgrid.ie/EMF>

not show that exposure to EMF below guideline levels presents a human health hazard". As outlined above, the EMF levels associated with the proposed 110kV cable for this project are well below the guidance thresholds.

Furthermore, as outlined in the study referenced by one of the Third-Party submissions¹⁰, the National Radiological Protection Board (the UK Government body established to monitor radiation risks), discounted the cited theory on the potential negative effects of electric and magnetic fields on the human body as "implausible and highly speculative". Additionally, the Scientific Advisor to the UK Electrical Association, noted that the industry has spent huge sums on investigations into the health effects of power lines, and that the balance of evidence indicates that power lines and the fields they produce do not have an effect on human health.

2.2.12 County Development Plan Policy

A number of submissions raise concerns relating to the policy context for renewable energy development in County Kilkenny. These issues are addressed in detail herein.

2.2.12.1 Renewable Energy Targets

Some submissions refer to Section 11.5.1 of the Draft Kilkenny City and County Development Plan 2021–2027 (CDP), which states that Kilkenny's renewable-energy targets were expected to be met by a mix of renewable sources with solar playing an increasingly significant role. They argue that this implies wind energy should be reduced and that additional wind farms represent a "proliferation" inconsistent with the CDP.

In response, we wish to confirm and make clear that Section 11.5.1 of the Draft Kilkenny City and County Development Plan 2021–2027 (CDP) has not come into effect. It was among the provisions explicitly withheld under the Minister's Direction, referenced above. Thus, the policy basis cited by observers is not part of the operative CDP. As such it cannot be relied upon as a rationale to limit wind development or favour solar as a substitute. In the absence of operative county-level targets or zoning provisions proposals must be assessed having regard to national and regional renewable-energy objectives, which continue to require the delivery of onshore wind capacity alongside solar and offshore energy.

2.2.12.2 Alternative Renewable Energy Sources

A submission suggests that wind energy should be developed offshore instead of onshore, or that greater emphasis should be placed on solar energy developments. These submissions imply that further onshore wind development is unnecessary or inappropriate in County Kilkenny. In response, it is important to clarify both the wider national policy context for renewable energy and the status of the relevant Development Plan provisions.

At national level, energy policy supports the continued development of onshore wind as a critical component of Ireland's renewable electricity mix. While offshore wind and solar energy form key pillars of the energy transition, they are intended to complement, rather than replace, onshore wind development. Large-scale offshore wind projects are subject to lengthy consenting processes, substantial grid and port infrastructure requirements, and extended

¹⁰ Research breakthrough on health effects of pylons? | News | CORDIS | European Commission



delivery timelines, while solar PV, although expanding rapidly, continues to represent a relatively modest proportion of national electricity generation.

Under the Climate Action Plan 2025, Ireland is required to deliver approximately 9 GW of onshore wind, 8 GW of solar PV, and at least 5 GW of offshore wind by 2030. Achieving this balanced mix is necessary to maintain grid stability, meet interim emissions-reduction targets, and ensure security of electricity supply during the transition to a low-carbon energy system. Onshore wind is a proven, cost-effective, and readily deployable technology capable of delivering significant renewable capacity within the current decade.

The grid application associated with this development facilitates the delivery of indigenous renewable electricity to the national grid at a time of increasing demand driven by electrification of heat, transport, and industry. Ireland's electricity system remains highly dependent on imported fossil fuels, particularly natural gas, with no strategic gas storage and a high reliance on interconnection with the UK. Enhancing domestic renewable generation through timely grid connections is therefore central to improving system resilience and reducing exposure to external energy supply risks.

Continued onshore wind development, supported by appropriate grid infrastructure, is consistent with national policy and the objectives of the Development Plan. It plays a necessary role in ensuring a secure, reliable, and sustainable electricity system while offshore wind capacity is progressively developed and brought online.

2.2.12.3 Applicable CDP Policies

Some submissions further argue that the absence of active renewable-energy targets or wind-strategy mapping in the Kilkenny City and County Development Plan 2021–2027 (CDP) renders onshore wind development premature or inappropriate. However, this interpretation is incorrect. Certain elements of Chapter 11, specifically Section 11.4 (Kilkenny Targets), Section 11.5.1 (Current Status and Targets), and Figure 11.4 (Wind Strategy Areas) did not come into effect due to the Minister's Draft Direction under Section 31 of the Planning and Development Act. The Direction did not remove or invalidate the entire Renewable Energy chapter; it simply required revision of specific parts that were considered insufficient in demonstrating how Kilkenny would contribute to national renewable-energy and climate obligations. This reflected a need for greater policy support for renewable energy, including wind. This approach is also consistent with Government energy-security policy. "Energy Security in Ireland to 2030" confirms that Ireland's transition from an import-dependent fossil-fuel system to a secure electricity-led system requires the accelerated delivery of indigenous renewable electricity, supported by timely grid connections. Onshore wind, as a mature and readily deployable technology, is identified as critical to maintaining security of supply during the transition period to 2030.

The suspension of effect of these sections does not render renewable-energy development inconsistent with the CDP. Instead, applications are assessed on their merits under the operative policies of the CDP, national legislation, EU renewable-energy directives, and the corresponding provisions of the 2014–2020 County Development Plan, which remain in effect where the corresponding provisions in the new plan did not come into effect. This approach is supported by the High Court decision in *Save The South Leinster Way & Anor v An Coimisiún Pleanála* [2025] IEHC 541, which confirmed that where a Section 31 Draft Ministerial Direction



prevents parts of a new plan from taking effect, the corresponding provisions of the earlier development plan continue to apply.

Accordingly, the following elements of the 2014 CDP are relevant to the assessment of the proposed development:

- Section 10.5.3 (Development Management Guidance);
- Appendix J (Wind Energy Development Strategy); and
- Figure 10.2 (Wind Strategy Map).

Under the 2014 Wind Energy Strategy and its associated strategy map, the Ballyfasy site lies mostly within a “Preferred Area,” defined as a location deemed most suitable for wind-energy development due to strong wind resources, low landscape and heritage sensitivity, feasible grid access, and limited risk of conflict with residential or community interests. The proposed Ballyfasy Wind Farm is therefore fully capable of being assessed within the existing statutory and policy context and is consistent with both national and local renewable energy objectives.

The principle of the proposed development is supported by the operative elements of the 2014 CDP, which remain in force for the purposes of planning assessment, due to the Draft Ministerial Direction. As such, the project is being assessed within a clear and established planning-policy framework. Assertions that onshore wind should be deprioritised in favour of offshore or solar energy, or that the proposed site is inappropriate, are not supported by national policy, regional obligations, or the applicable development plan provisions.

2.2.13 Project Splitting / Cumulative Effects

The wind farm and its associated grid connection were submitted to ACP as two separate planning applications, as is required under the Planning and Development Act, 2000:

- The wind farm is submitted under Section 37E of the Planning and Development Act; and
- The grid application is submitted under Section S182A.

This does not constitute project splitting which is defined as “A tactic where a larger project is divided into smaller parts to evade comprehensive environmental assessments.”¹¹

The Ballyfasy planning application documents and specifically, the submitted EIAR assesses the wind farm and the full grid connection as a single, integrated project, including all combined and cumulative effects. The EIAR contains a full cumulative assessment of other existing, permitted and proposed energy projects in the region, ensuring complete transparency on turbine concentration and overall impacts. The proposal therefore meets the NPF’s requirement for plan-led, appropriately assessed renewable-energy development, and the use of two ACP applications does not undermine cumulative assessment nor conflict with national planning principles. This approach was confirmed as appropriate by ACP under pre application references ACP 320900-24 and ACP 321814-25.

The proposed project was also cross referenced in both applications, statutory notices and within the EIAR.

¹¹ Coyne v An Bord Pleanála: A Landmark Judgment on Environmental Impact Assessment and Project-Splitting in Ireland: High Court of Ireland | CaseMine



2.2.14 Objections to Use of the 2006 Wind Energy Development Guidelines

Observers argue that the 2006 Wind Energy Development Guidelines (WEDG) are outdated, have not undergone SEA, and therefore cannot be relied upon by the Commission.

The 2006 Wind Energy Development Guidelines apply primarily to wind farm developments and their ancillary infrastructure. While they make limited reference to grid connections in that context, they do not set policy or standards for standalone electricity transmission projects.

As a linear electricity transmission development submitted under S.182A, the application documentation assesses relevant environmental factors within the EIAR and NIS submitted with the application, together with the policies of the Kilkenny CDP which address underground cabling and transmission infrastructure.

In respect of the associated wind farm, the 2006 WEDG remain the operative national guidance issued under Section 28 of the Planning and Development Act until formally replaced. They continue to be applied by planning authorities and by An Coimisiún Pleanála in current decision making.

It is also noted that updated Wind Energy Development Guidelines were published in draft form in 2019. However, these draft guidelines were never finalised or adopted and therefore do not have statutory status. As such, they do not replace the 2006 Wind Energy Development Guidelines, which remain the operative national guidance. In any event, neither the 2006 Guidelines nor the 2019 draft Guidelines set policy or assessment standards for standalone electricity transmission or grid-connection infrastructure. The assessment of the Ballyfasy Grid Connection is therefore correctly undertaken with reference to the applicable provisions of the Kilkenny CDP, together with the EIAR and NIS submitted with the application.

2.2.15 Grid Capacity and Energy Output

Observers argue that the project overstates its likely energy yield, and that Kilkenny is a constrained grid region. They state that additional onshore wind capacity should not proceed until the national grid is upgraded.

Ireland's national target of achieving 80% renewable electricity by 2030 requires ongoing reinforcement and expansion of the transmission system, and all such grid infrastructure is subject to the statutory planning and consenting process. EirGrid, as the national Transmission System Operator, is responsible for planning, developing and operating the transmission network, and all new high-voltage infrastructure, such as substations, cables and overhead lines must comply with EirGrid's Transmission Policies and Standards, which govern the design, construction and siting of transmission assets. The proposed wind farm's grid connection infrastructure will be developed in consultation with EirGrid to ensure full compliance with these requirements.

National policy reforms and investment programmes are actively strengthening Ireland's grid to accommodate increasing levels of renewable generation and to support progress toward the 2030 renewable electricity target. EirGrid's ongoing system development, regulatory framework, and established compliance processes ensure that new renewable generators, such



as the proposed wind farm can be safely and effectively integrated into the national electricity system.

The Government's Climate Action Plan 2024 explicitly recognises that additional transmission infrastructure is essential to meet Ireland's renewable energy commitments and requires public bodies to support its delivery, including facilitating optimal routing of transmission assets through public roads where appropriate. Within this policy context, renewable energy projects and their associated grid connections are supported by an evolving, plan-led planning system that acknowledges the parallel need to deliver both renewable generation and the transmission upgrades required to accommodate that generation on the national grid.

In the context of Kilkenny, the South East of Ireland is seen as a good area of the grid in terms of having very low constraints for wind. EirGrid are responsible for planning, developing and operating the grid and where they see issues they are best placed to manage grid constraints. They are progressing projects, including new and upgraded infrastructure along with operational improvements, to add capacity. At the end of last year they got approval for the revenue allowance to proceed with a number of projects under CRU's PR6 which adds more grid capacity, and they can look for a higher revenue allowance if they need to carry out more projects beyond those already identified.

In terms of the proposed Ballyfasy Wind Farm project, it is proposed to connect to the 110kV Transmission System which has a much higher capacity and lower constraints in this area than the Distribution System.

It is also of note that grid constraints should not be seen as an impediment to granting permission for windfarms since a critical mass of projects with consent is a key enabler for further grid investment (and that there are various strategies in respect of the latter being advanced at present).

2.2.16 Road Closures, Traffic Disruption and Community Impact

Concerns were raised that trenching works associated with the underground grid connection could result in prolonged road closures and significant disruption to local communities.

GCO One will be laid within approximately 8.45 km of public road. GCO Two is located within the proposed wind farm site and does not require any public road works. The installation of the underground cable will be undertaken in short, sequential construction sections, with no more than approximately 250 m of trench open at any one time, ensuring that disruption on the public road network is localised and temporary rather than continuous along the route.

Temporary lane closures and, where necessary, short-duration road closures may be required to facilitate safe construction, particularly at road crossings. These closures will:

- be limited to the immediate work area;
- occur during working hours only;
- be undertaken outside peak traffic periods where practicable; and
- be agreed in advance with the Roads Authority.

A detailed Construction Traffic Management Plan will be prepared prior to commencement of works on public roads and agreed with Kilkenny County Council. This plan will specify the traffic



management measures to be implemented, including arrangements for temporary closures, traffic control, diversion routes and access provisions.

Trenches will be backfilled at the end of each working day and provided with suitable temporary surfacing, thereby maintaining trafficability outside working hours. Diversions will be provided where required, and local access will be maintained.

Due to the short length of road affected at any one time and the provision of diversion routes, widespread rerouting of traffic onto minor local roads is not anticipated.

2.2.17 Impact R704 as an Emergency Diversion Route for the N25

Submissions note that the R704 may function as part of an emergency diversion route for the N25 and express concern that construction works could affect this role.

The proposed works involve only a temporary lane closure of the R704 at the trench crossing location. Traffic management measures will be agreed in advance with Kilkenny County Council. An Garda Síochána and emergency services through the Construction Traffic Management Plan to ensure that the safe operation of the regional road network is maintained.

Given the short duration and localised nature of the works at any one location, significant disruption to the wider network is not anticipated.

2.2.18 Road Condition, Structural Stability and Heavy Vehicle Impacts

Concerns were raised regarding potential damage to rural roads, soft verges and road structure from construction activities.

Grid connection works associated with underground cable installation are not significant generators of heavy goods vehicle (HGV) traffic. The construction process is primarily labour-intensive and involves trenching, cable laying and reinstatement activities conducted using smaller plant and equipment. As such, the majority of construction traffic will consist of light vehicles transporting personnel and smaller equipment, with only limited HGV movements required for delivery of materials and removal of excavated material.

A pre-construction road condition survey will be undertaken along the sections of public road affected by the grid connection works. This survey will document the existing condition of the carriageway, verges and associated road infrastructure.

Works on public roads will be undertaken under a Road Opening Licence issued by the local authority and in accordance with its requirements. Trenches will be reinstated following installation of the cable, and any damage attributable to construction activities will be repaired.

The level of traffic associated with grid connection works is substantially lower than that associated with the main wind farm construction activities and will occur over a shorter duration.

2.2.19 Traffic Safety and Potential Hazards

Submissions expressed concern that increased traffic could create additional road hazards, particularly on narrow rural roads.



The grid connection works are linear, temporary in nature (occurring over 9 months) and will be undertaken in short, sequential sections, thereby limiting the extent of any safety impact at a given location. Construction traffic associated with the works will consist predominantly of light vehicles transporting personnel and smaller equipment, with relatively limited heavy goods vehicle movements required.

Appropriate temporary traffic management measures will be implemented to ensure the safe interaction of construction vehicles with other road users, including pedestrians, cyclists and local traffic. These measures may include traffic control systems, signage, speed management and, where necessary, temporary lane restrictions.

A detailed Construction Traffic Management Plan will be prepared prior to commencement of works on public roads and agreed with Kilkenny County Council, in consultation with An Garda Síochána. This plan will set out the specific safety measures to be implemented, taking account of local road conditions and traffic patterns.

Given the temporary, localised nature of the works and the predominance of light vehicle traffic, significant long-term safety impacts on the surrounding road network are not anticipated.

2.2.20 Emergency Services Access

Concerns were raised that construction activities associated with the grid connection could impede emergency vehicles or affect emergency response capability.

The proposed works are temporary and will be undertaken in short, sequential sections, ensuring that only limited portions of the road network are affected at any one time. Construction traffic will consist predominantly of light vehicles, and significant increases in heavy traffic volumes are not anticipated.

Prior to the implementation of any road closures or traffic restrictions, the appointed Contractor will consult with Kilkenny County Council, An Garda Síochána and other emergency services to agree appropriate traffic management arrangements and diversion routes. These arrangements will be incorporated into the Construction Traffic Management Plan to be prepared and agreed prior to commencement of works on public roads.

Traffic control measures will be designed to ensure that emergency access is maintained at all times. Where necessary, temporary traffic management systems will allow for the safe and priority passage of emergency vehicles through the works area.

Given the temporary, localised nature of the construction activities and the coordination proposed with relevant authorities, significant impacts on emergency response capability are not anticipated.

2.2.21 Agricultural and Local Access

Submissions note potential disruption to agricultural activities and access to local properties during trenching works associated with the grid connection.

Access to residential properties, farms and local businesses will be maintained throughout the construction period as far as practicable. The works will progress in short, sequential sections, ensuring that disruption to any individual property or landholding is temporary and localised.



The timing and implementation of works affecting property access will be coordinated in advance with affected landowners and occupiers. Where temporary restrictions are unavoidable, alternative access arrangements will be provided where feasible, and advance notice will be given. Particular consideration will be given to maintaining access for agricultural operations, including the movement of machinery and livestock where required.

Specific access arrangements relating to works on public roads will be addressed within the Construction Traffic Management Plan to be prepared and agreed with Kilkenny County Council prior to commencement of works. This plan will include measures to ensure that local access needs are appropriately managed throughout the construction period.

2.2.22 Roadside Drainage and Road Integrity

Concerns were raised that trenching works associated with the grid connection could disrupt roadside drainage systems, alter water runoff patterns and adversely affect adjacent land.

Construction activities will be undertaken in accordance with standard engineering practice and local authority requirements to protect existing drainage infrastructure. Where works occur within public roads, they will be conducted under a Road Opening Licence issued by Kilkenny County Council, which will specify requirements for the protection, management and reinstatement of drainage systems and road structures.

Any drainage features disturbed during construction will be reinstated following installation of the underground cable, ensuring that existing runoff patterns and road drainage performance are maintained. Road surfaces, verges and associated infrastructure will likewise be restored on completion of the works.

Given the temporary and localised nature of the trenching activities, significant long-term impacts on roadside drainage, adjacent lands or the structural integrity of the road network are not anticipated.

2.2.23 Ornithology

Concerns were raised with regards to the impact on birds including breeding birds in the area.

Grid Connection Option One involves buried cables from the proposed onsite 110kV substation predominantly along existing roads and tracks to Castlebanny 110kV substation. Grid Connection Option Two involves buried cables from the proposed onsite 110kV substation predominantly along site access tracks to loop in with the existing Great Island to Kilkenny 110kV line. As the infrastructure for both grid connection options are predominantly underground, impacts will be short-term and are not likely to be significantly more disturbing than baseline conditions. Therefore the potential for significant effects on ornithological receptors (including SPAs) is negligible during construction, and there would be no impacts during the operational phase. An ECoW will be present to ensure that works are completed in compliance with relevant legislation and best practice. The project NIS stated with “*no reasonable scientific doubt that the implementation of the proposed project, subject to the identified mitigation measures, will not adversely affect the integrity of any European sites during the construction, operational and decommissioning phases of the proposed project, either alone or in combination with any other plans or projects*”.



Also as noted within EIA Chapter 2 (Description of the Proposed Project), EIA Chapter 7 (Ornithology), and the Construction Environmental Management Plan (CEMP) the applicant has confirmed the following. With the exception of commercial forestry felling, vegetation clearance will commence outside the breeding birds season, which runs from the 1st of March to the 31st of August to protect any active bird nests and chicks. If any minor clearance or trimming is required within those dates, or if the initial vegetation clearance extends past the 1st of March due to unsuitable weather conditions, the works will be preceded by a confirmatory ecological survey (carried out by a qualified and suitably experienced ecologist) to ensure there are no active bird nests within the vegetation involved. If active bird nests are identified, works will stop and consultation will be undertaken with the National Parks and Wildlife Service (NPWS).

2.2.24 Biodiversity (excluding birds and bats)

Concerns raised in third party submissions with regard to designated sites, habitats and flora and fauna (excluding bats) are addressed hereunder. These have been addressed by TOBIN, as authors of Chapter 6 (Biodiversity) of the EIA and the Natura Impact Statement (NIS).

2.2.24.1 Biodiversity and Protected Species

Submissions raise concerns about potential effects on a range of fauna species during construction and operation of the proposed project. Chapter 6 (Biodiversity) of the EIA evidences the presence or likely presence of these receptors and evaluates the significance of potential effects and proposes mitigation measures where required.

The EIA describes the baseline ecological conditions of the proposed project and study area. Baseline information was collected according to the methodologies outlined in Section 6.7 and results are included in Section 6.10 of Chapter 6 (Biodiversity) of the EIA.

In brief, the mammal species confirmed or likely to be present include badger (foraging signs near T6; no setts recorded), otter (no signs recorded but assumed to be present based on habitat suitability and connectivity to the River Barrow and River Nore SAC), pine marten (one scat recorded near the proposed substation suggesting infrequent use), fallow deer (droppings recorded in conifer plantation/recently felled woodland), hedgehog (likely present, based on the desktop study) and red squirrel (likely present based on the desktop study). The only amphibian species recorded as present is the common frog (observed at three locations; likely widespread). Habitat suitability was noted for smooth newt, however, no evidence of this species was returned from the desktop study or recorded during field surveys and therefore was not considered in the assessment. Fish species which were raised in the submissions, which are confirmed or likely to be present include salmon and lamprey species.

The EIA identifies potential impacts on the fauna species identified as important ecological features. During the construction phase of the proposed grid connections (GCO One and Two), these potential impacts include temporary habitat loss and habitat fragmentation, disturbance/displacement, habitat degradation as a result of water quality and dust deposition impacts and construction mortality. These potential impacts are assessed in Section 6.12 of Chapter 6 (Biodiversity) of the EIA. Where required, mitigation measures have been prescribed to avoid/reduce potential impacts on fauna species.



Having regard to the baseline surveys, the impact assessment set out in Chapter 6 (Biodiversity) of the EIAR, and the mitigation measures incorporated, the assessment concludes that no significant residual effects are predicted for any fauna species (excluding bats which are discussed separately).

2.2.24.2 Adequacy of Surveys

A submission by Breda Deasy raised a concern about the adequacy of ecological surveys carried out of the Grid Connection Option (GCO) One route. The proposed GCO One is a 12 km underground cable connection which mainly follows the public road network and will cut across agricultural grassland (GA1) and conifer plantation habitat (WD4). This submission noted the lack of targeted badger, pine marten, fallow deer and otter surveys. Habitat surveys were carried out of the proposed GCO One route in August 2025. It is acknowledged that Chapter 6 (Biodiversity) of the EIAR does not specifically mention that terrestrial mammal surveys were carried out, however, it can be confirmed that they were carried out in conjunction with the habitat surveys in August 2025, according to the methodology outlined in Section 6.7.2.2 of Chapter 6 (Biodiversity). Additionally, surveys for signs of otter and habitat suitability for same were conducted in conjunction with the aquatic surveys carried out at the proposed GCO One watercourse crossings. The results of these surveys are incorporated into the relevant sections of Chapter 6 (Biodiversity).

2.2.24.3 Cumulative Effects

A submission by Breda Deasy raised a concern about the availability of alternative habitat in the surrounding area when considering the construction of the 'combined proposed wind farm and the proposed GCO One 12 km route'. The EIAR assesses the proposed project as a whole, including the wind farm, GCO One and GCO Two. With regards to cumulative effects arising as a result of the proposed project interacting with other proposed and existing projects, particularly other wind farms. Chapter 6 (Biodiversity) of the EIAR assesses cumulative effects in Section 6.12.5, and the NIS addresses in-combination effects in Section 6.3.

Projects with potential to interact cumulatively/in-combination with the proposed project to result in likely significant effects on biodiversity/European sites were identified from a search of the local authorities planning registers (KCC, 2025), the EIA portal (EIA, 2025), planning applications (MyPlan, 2025), EIAR documents and planning drawings which facilitated the identification of past and future projects, their activities and their potential environmental impacts. All projects listed in Chapter 1 (Introduction) of this EIAR were reviewed as part of the cumulative effects assessment.

The EIAR's cumulative ecological assessment evaluates the proposed project together with other operational, permitted and proposed projects in the wider area, including other wind farms. The assessment considers:

- shared impacts, such as habitat loss/fragmentation, disturbance, and hydrology/water-quality effects etc;
- spatial overlap in zones of influence for ecological receptors; and
- temporal overlap in construction periods where relevant.

The NIS's in-combination assessment follows the same approach as described above for the EIAR, in relation to European sites.



The cumulative assessment carried out in Chapter 6 (Biodiversity) of the EIAR identified six projects with potential for cumulative effects with this proposed project, five wind farms and one flood relief scheme. It was concluded that no significant cumulative effects are anticipated in relation to habitats or fauna (excluding bats). The in-combination assessment carried out for the NIS identified the same six projects with potential for in-combination effects with the proposed project. However, it was concluded that there is no potential for these projects to result in in-combination effects with the proposed project on European sites.

2.2.24.4 Horizontal Direct Drilling and Biodiversity

Submissions noted that proposed GCO One will cross the Arrigle River and its tributaries using Horizontal Direct Drilling, and noted potential impacts associated with these works. Horizontal Direct Drilling has been incorporated into this proposed project as an embedded mitigation measure, as it is a trenchless method to remove direct impact to watercourses and habitats. It is acknowledged that there are potential impacts associated with this aspect of the proposed project, and they have been assessed in full and mitigated according to Section 6.12.2.3.4.2 of Chapter 6 (Biodiversity) of the EIAR. Following the implementation of the mitigation measures, there will be no significant residual effects on habitats or species.

2.2.24.5 Invasive Species

A submission by Kathleen Moore Walsh raised a concern about the potential for invasive species to colonise areas following removal of habitats. Surveys carried out identified no invasive plant species listed on the Third Schedule (S.I. No. 477 of 2011) within the footprint of the proposed project. It was therefore not considered likely that the proposed project would result in the spread of invasive species and this potential impact was not considered further within Chapter 6 (Biodiversity) of the EIAR. Although unlikely, in a worst-case scenario it is acknowledged that the removal of vegetation as a result of the proposed project could provide suitable habitat for invasive species to colonise from outside of the footprint of the proposed project. Therefore, the applicant proposes to implement the following mitigation measures with regard to invasive species:

- An Ecological Clerk of Works (ECoW) with adequate and evidenced experience in dealing with invasive plant species will be appointed for the project.
- The ECoW will carry out pre -construction confirmatory surveys of the footprint of the proposed project to record any invasive species which may have colonised the proposed project site. A post-construction confirmatory survey will be conducted within 12 months of completion, in the invasive species growing season (May to September).
- If any Third Schedule invasive plant species are recorded during these surveys, the ECoW will produce an Invasive Species Management Plan (ISMP) for the proposed project, detailing treatment measures required to control and/or eradicate populations of invasive species on the proposed project site.
- An invasive species contractor will be appointed to implement the treatment measures, as specified by the ECoW, and under their supervision.
- If an ISMP is required, it will detail a follow up treatment monitoring plan which will be implemented and updated by the ECoW.



2.2.24.6 Mill Race River

A submission by Kathleen Moore Walsh raised a concern about the Mill Race River which flows through Glenmore Village, this is also known as the Glenmore River, or the Oaklands_010 waterbody as per the Water Framework Directive. This waterbody is located in a separate subcatchment to the proposed project i.e. this waterbody is located within the Nore_SC_140 subcatchment, and the proposed project is located across the Nore_SC_130 and Blackwater[Kilmacow]_SC_010 subcatchments. Therefore, there is no downstream hydrological connectivity between the proposed project and this waterbody. It is acknowledged that this waterbody is part of the River Barrow and River Nore SAC. Potential effects relating to this European site have been fully assessed in the NIS and Chapter 6 (Biodiversity) of the EIAR

2.2.24.7 Additional Observations

One submission expressed the opinion that the application for the grid connection should have an EIAR & NIS completed specifically for Horizontal Direct Drilling (HDD) works due to the size and magnitude of these works. HDD works are a work element of the overall project and as such they are included within the project description and assessed in the project EIAR and NIS as part of the overall project.

2.2.25 Bats

Submissions relevant to bat ecology have been reviewed and categorised based on their topics as follows:

- Survey methods; and
- Data interpretation.

2.2.25.1 Survey Methods

The Bat Conservation Trust (BCT) (Collins, 2023)¹² and NatureScot (2021)¹³ provide guidance for the assessment of potential impacts on bats arising from development projects. While much of this guidance is directed toward wind farm developments, its principles are used here to inform a proportionate assessment of bat-related impacts associated with the proposed grid connection

2.2.25.1.1 Surveys of Grid Connection Areas

Regarding surveys within the Grid Connection Option (GCO) and Turbine Delivery Route (TDR) areas, ecological walkover surveys were undertaken within these areas to identify potential constraints relevant to the routing of the grid connection and delivery infrastructure. These walkovers were used to highlight where further ecological confirmatory surveying may be required prior to construction. Any features of potential value to bats (roosting, resting, commuting or foraging habitat) along the GCO/TDR areas that require confirmatory pre-construction inspection will be subject to inspection by a suitably qualified ecologist prior to works commencing and appropriate action will be taken in line with standard practice.

¹² Collins, J. (ed.) (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edition). The Bat Conservation Trust, London. ISBN-13 978-1-872745-96-1.

¹³ NS (2021) Bats and Onshore Wind Turbines – Survey, Assessment and Mitigation, NatureScot, <https://www.nature.scot/doc/bats-and-onshore-wind-turbines-survey-assessment-and-mitigation>.



2.2.25.1.2 Zone of Influence

Concerns were raised regarding the likely presence of maternity roosts that were considered outside of the Zone of Influence (Zol) for the proposed wind farm. The Zol is defined by Chartered Institute of Ecology and Environmental Management (CIEEM) (2018) as *'the areas/resources that may be affected by the biophysical changes caused by activities associated with the project'*. It is highlighted that Zol often extends outside the boundaries of the project and that the Zol varies depending on the sensitivity of different ecological features to environmental change. The guidance also states that scoping should be proportionate to potential effects of ecological features. This requires the professional knowledge and experience of an ecologist to judge the resources required to complete an adequate and effective assessment.

Custom Zols for the desk study and field surveys were used, taking into consideration the potential effects posed by wind farms:

- collision mortality, barotrauma and other injuries;
- loss or damage (including effects of lighting) to commuting and foraging habitat;
- loss of, or damage to, roosts; and
- displacement of individuals or populations (due to wind farm construction and operation including noise and human activity).

For the desk study aspect of the assessment, the maximum core sustenance zones (CSZs) for bat species known to occur in Ireland were used. The BCT guidance defines CSZ as *'the area surrounding a communal bat roost within which habitat availability and quality will have a significant influence on the resilience of the colony using the roost.'* As such it is a good proxy for Zol. This Zol was extended to 10 km for the cumulative impact assessment on a precautionary basis only.

Given the nature of the proposed grid connection, which comprises predominantly underground cabling, there is no potential for operational bat impact pathways such as collision risk, barotrauma or population-level displacement. Accordingly, considerations relating to wide Zones of Influence, turbine buffers or activity-based collision mitigation are not applicable to the grid connection.

For the purposes of assessing the grid connection, it was considered proportionate to limit bat survey coverage to the immediate works corridor and adjoining habitats that could be subject to temporary disturbance during construction. This approach is consistent with relevant best-practice guidance, which requires survey effort to be proportionate to the scale, duration and nature of potential effects.

Bat considerations for the grid connection are therefore addressed through ecological walkover surveys to identify features of potential bat value and, where relevant, confirmatory pre-construction checks to ensure that baseline conditions have not changed prior to works commencing.

2.2.25.1.3 Survey Limitations

The limitation on automated detector surveys was recognised in paragraph 2.6.10 of the Bat Survey Report (Appendix 6-5 of the EIAR). This limitation arose due to health and safety constraints related to the presence of livestock and was therefore unavoidable. The original location of the detector was along the hedgerow immediately south of proposed Turbine 8. The relocation of the static detector is not considered significant because the detector was



relocated along the same linear feature and thus was functionally connected to and similar in nature to the original detector location. There was no obstruction along the linear feature or other evidence to suggest that bats would have a preference between the original location of the detector or the relocation areas. As such the data collected is representative of the bat activity in the vicinity of Turbine 8.

The limitation on aerial/close inspection and emergence surveys is recognised in paragraph 2.6.9 of the Bat Survey Report (Appendix 6-5 of the EIAR). The limitation was that potential roost features (PRFs) were only assessed once between May and September due to a delay in obtaining access for these assessments. This limitation was not considered significant for the aerial/close inspections in relation to the proposed development. All trees scheduled for removal to facilitate turbine buffers were classified as PRF-I during the GLTA. PRF-I features are only suitable for individual bats or occasional use and are not of a type typically associated with maternity or hibernation roosts (Table 6.2, Collins 2023). No confirmed roosts were recorded during aerial/close inspection. As such, impacts on PRF-I trees can be assessed using the precautionary principle without requiring additional survey effort as per the BCT guidance (Collins, 2023).

Conversely, this limitation is considered relevant for the assessment of PRF-M features, which are suitable for use as maternity roosts. Although this limitation is acknowledged, the impact assessment incorporates it by adopting a precautionary approach. As stated in paragraph 3.2.6 of the Bat Survey Report (EIAR Appendix 6-5), if more than 18 months elapse between the original GLTA and proposed vegetation removal, an updated GLTA will be undertaken to confirm the current status of PRF-M features and identify any requirement for further survey. Should any PRF-M feature subsequently be confirmed as supporting roosting bats, a derogation licence would be required at that stage before any works take place. However, as no roosts were identified and only PRF-I trees are scheduled for removal, a derogation licence is not required at this time.

2.2.25.2 Data Interpretation

The purpose of the automated detector surveys was to evaluate the bat activity within the survey area. This data provides information about the habitat being assessed such as the value it has for the local bat population and the proximity of roosts. It should be noted that the number of passes alone is not indicative of population size. The total of 52,100 bat passes recorded across the automated detector network represents the number of echolocation files triggered during the survey period rather than the number of individual bats present. Bat passes represent feeding and commuting patterns and are influenced by repeated foraging loops and species-specific call rates, which means it is not possible to determine population size without manual surveillance or the use of night vision aides in conjunction with the automated detectors.

2.2.26 Landscape and Visual Impact Assessment (LVIA)

This section deals with third party observations raised with regard to the submitted landscape and visual assessment. Overall, there were two observations raised with reference to landscape and visual issues. Issues raised within the submission response are addressed by way of themes rather than on an individual basis. The themes to be addressed may be summarised as follows;

- 1) Landscape impact of the proposed Grid Connection facilities;



2) Perceived visual effects generated by the proposed Grid Connection facilities.

The EIAR chapter and this response were prepared by Macro Works (Part of APEM Group) who are the LVIA consultants for this project. Macro Works are Ireland's leading landscape consultancy firm specialising in LVIA development projects and one of the only companies in Ireland wholly dedicated to LVIA and associated mapping and visualisations.

2.2.26.1 Landscape impact of the proposed Grid Connection facilities

Concerns have been raised regarding the perceived landscape impacts generated by the proposed grid connection facilities. In this regard, it is important to note that, to a large extent, the proposed grid connection infrastructure comprises underground cable connections, which have relatively limited physical and perceptual landscape impacts. Indeed, much of the potential landscape effect associated with underground cabling relates primarily to the construction phase, during which small trenches will be excavated to accommodate the underground cable corridors.

While there will be some temporary disruption to prevailing land uses and adjacent vegetation during this phase, the underground cable corridors will have little to no lasting impact during the operational phase of the proposed project, as the affected areas will be fully reinstated following completion of construction works.

With regard to the substation compound, a more notable, though highly localised, landscape impact will occur. The proposed 110 kV on-site substation will be located within an area of existing forestry, set back from the surrounding road network to the north of proposed turbine T3 and to the west of turbine T4. The proposed substation compound will include a control building with a pitched roof and concrete render finish, along with the electrical infrastructure required to export the generated electricity from the wind farm to the transmission system. A smaller switchgear building will also be located within the compound, together with a telecommunications mast.

The compound will be enclosed by 2.6 m high steel palisade fencing. Some physical landscape effects will arise from the clearing of limited areas of forestry and from localised excavation works required to facilitate the foundations of the proposed buildings and associated infrastructure. There will also be a conversion of a small area of rural working land to accommodate the more anthropogenic land use associated with the substation compound.

Notwithstanding these changes, the substation compound will be well contained by the surrounding conifer forestry, which will assist in limiting its visibility and reducing its potential to materially alter the wider landscape character of the area. Accordingly, while the proposed substation development will introduce a degree of change to the immediate landscape context, its effects are expected to remain confined largely to the immediate vicinity of the site.

Overall, the landscape impacts associated with the proposed grid connection facilities are considered to be modest and highly localised. While the substation component will give rise to some landscape effects, these are assessed as Not Significant, with limited influence beyond the immediate surroundings of the compound. The underground cable elements of the grid connection will have no discernible impact on the surrounding landscape character during the operational phase of the development due to their subterranean nature.



2.2.26.2 Perceived visual effects generated by the proposed grid connection facilities

As noted in the above section, the proposed underground cable connections will be located below ground level and will therefore generate no residual visual effects during the operational phase of the proposed project. Accordingly, any residual visual effects associated with the proposed grid connection facilities relate solely to the proposed substation development.

With regard to the proposed substation, it is located within a well-contained part of the surrounding landscape, as illustrated in the submitted photomontage booklet. While the substation is visible in several of the wireframe views, the actual visibility of the proposed substation and its associated structures is very limited, even at the nearest surrounding receptors. The proposed substation compound will be enclosed on all sides by existing conifer forestry and boundary vegetation, which partially, and in many instances fully, screens the proposed built structures.

Where residual visibility of elements within the substation compound does occur, this typically relates to brief and intermittent views of the taller structures within the compound. In particular, this relates to the proposed lightning protection masts, which are slender structures rising to approximately 19 m above existing ground level. However, due to their slender profile, these structures will have a limited visual presence and are not expected to materially affect the visual amenity of the surrounding landscape.

It should also be noted that the proposed Grid Connection Option Two includes the installation of new 110 kV overhead interface masts as part of a loop-in arrangement. Whilst these permanent structures have the potential to give rise to some localised visual effects, such built features are not uncommon within the surrounding rural landscape, which is influenced by existing overhead cable corridors and other surrounding pylon structures. As such, the introduction of these features is not considered to give rise to significant visual effects, even within the immediate surrounding landscape context.

From Tory Hill, one of the more elevated and sensitive receptors within the study area, the proposed substation may be partially visible at a distance of approximately 4 km. While some elements of the substation infrastructure—principally the lightning protection masts—may theoretically be perceptible from this location, the considerable viewing distance and the minimal visual profile of these structures means that they will contribute little in the way of notable adverse visual effects.

In summary, while limited and occasional views of elements of the proposed substation development may be available from parts of the surrounding local and wider landscape, the primary built components of the substation will be substantially screened by the surrounding conifer forest plantation and intervening vegetation. Where visible, the slender lightning protection masts will have a very limited visual presence and will not materially affect the visual amenity of the surrounding area. Accordingly, the visual effects associated with the proposed grid connection infrastructure are assessed as Not Significant.

2.2.27 The setting of archaeological and cultural heritage within the wider Ballyfasy area

Concerns were raised regarding the setting of archaeological and cultural heritage within the wider Ballyfasy area. Chapter 15 (Archaeology and Cultural Heritage) of the submitted EIAR

assessed the predicted impacts of the proposed project on the archaeological, architectural and cultural heritage resource. The assessment considered the sensitivity of the heritage receptor and the magnitude of the potential impact, and assigned a predicted significance of effect. The assessment concluded that neither Grid Connection Option (GCO) One nor GCO Two will negatively impact the setting of archaeological and cultural heritage, as cables will be embedded within the ground.

2.2.28 Archaeological Mitigation

A submission questions whether the “preservation by record” approach is an appropriate form of mitigation. Although Chapter 15 (Archaeology and Cultural Heritage) has confirmed that no known archaeological remains are located within the footprint of the proposed wind farm, the potential remains for previously unknown archaeological remains to survive below the current ground level. The mitigation measures described in Chapter 15 (Archaeology and Cultural Heritage) include archaeological test trenching and archaeological monitoring, which will ensure that potential sub-surface archaeological remains are identified. The “preservation by record” approach is outlined in Framework and Principles for the Protection of the Archaeological Heritage (Department of Arts, Heritage, Gaeltacht and the Islands 1999). The approach ensures that archaeological remains are excavated under licence by suitably qualified archaeologists, and “ensures that, as a minimum, a complete and meaningful record is preserved of all archaeological deposits, features and information likely to be damaged as a result of the development” (DAHGI 1999, 25).

A submission notes that archaeological remains may be encountered during excavation of the greenfield section of the proposed grid connection. Chapter 15 has assessed this, noting that ground disturbances associated with the excavation of the Grid Connection Option (GCO) One trench have the potential to result in direct and negative (permanent) effects on any currently unknown archaeological remains that may be present. Archaeological test trenching and monitoring along this route will be carried out, ensuring that any sub-surface archaeological remains are identified and preserved (by record or in-situ).

A submission queries the 50 m study area of the grid connection. This is an established methodology that has been applied to several grid connections assessments. The study area is sufficient to identify monuments which may extend across a wide area, and could potentially extend into the proposed grid connection.

The submission notes that the townland of Ballyfasy Upper was the scene of a failed eviction in 1885, when Tighe of Woodstock, Inistigue, the landlord, moved to evict six tenants. A group organised by the local Land League branches and local clerics resisted the eviction party at the home of Mrs. Anastasia Dollard. It is acknowledged that this is an important facet of the local history of Ballyfasy. The submission notes that the site of the failed eviction should be remembered, although a location for the specific house where the event occurred is not given. Griffith’s Valuation records Dollards living in parcels 11A–E, although no historic buildings survive within these parcels apart from one included in CH18 in Chapter 15 (Archaeology and Cultural Heritage). Neither GCO One nor GCO Two will impact CH18.

The submission questions that Chapter 15 (Archaeology and Cultural Heritage) has not identified significant residual effects. The effects of the proposed project on the archaeological, architectural and cultural heritage resource range from imperceptible to moderate, prior to the



application of mitigation. The assessment has followed the methodology defined in Chapter 15 (Archaeology and Cultural Heritage), with the combination of a receptor's sensitivity and the magnitude of impact resulting in the significance of effect.

2.2.29 Ballyfacey National School - Local Heritage

A submission notes that the Ballyfacey National School is part of the local heritage. The school is recorded in EIAR Chapter 15 (Archaeology and Cultural Heritage) with the designation BH15. Following the methodology outlined in Chapter 15 (Archaeology and Cultural Heritage) neither Grid Connection Option (GCO) One nor GCO Two will negatively impact BH15. Neither grid connection option passes the school.

The submission also describes Glenmore GAA, although the club is located outside the 50 m study area of the grid connections for cultural heritage.

2.2.30 Archaeologically rich area

A submission notes that the area is archaeologically rich and subject to statutory protection. EIAR Chapter 15 (Archaeology and Cultural Heritage) has included both recorded and unrecorded archaeological, architectural and cultural heritage in its assessment, including sites subject to statutory protection. The submission notes that impacts are predominantly managed through monitoring rather than avoidance. This statement is incorrect. As part of the embedded mitigation, both Grid Connection Option (GCO) One and GCO Two have avoided all recorded heritage receptors. The route of GCO One passes through the Zone of Notification of one group of recorded monuments (AH02), although no likely direct impacts upon the recorded features themselves are predicted. This is further discussed below. Further mitigation includes archaeological monitoring across greenfield locations of the proposed grid connections. This will mitigate impacts to potential sub-surface archaeological remains that may be present. If any archaeological remains are present, further mitigation will be implemented as required and agreed with the National Monuments Service.

2.2.31 Mullenakill Church

Several submissions express concern with regards to the construction of Grid Connection Option (GCO) One in the vicinity of Mullenakill Church.

This site has been recorded as AH02 in Chapter 15, along with a related graveyard and mill recorded at this location. The church survives in a roofless, ruinous condition, and is located in a pasture field to the east of the existing L3418 road. It should be noted that the grid connection cable will be laid within the existing road surface of the L3418, and not through the site itself. The L3418 is present at the time of the 1842 OS map, and therefore formed a western boundary to the church and graveyard site from 1842 onwards. Mullennakill Church is depicted on the 1842 map, with the annotation 'Church (in ruins)', indicating that it had fallen out of use by the mid-19th century at the latest. The church is also shown as ruinous on the 1902 OS map. It is of note that an associated graveyard is not shown on either the 1842 or 1902 OS maps.

The interior of the church has been reused as a small graveyard. The church was described in 1970 by William Canon Murphy in 'The Pattern of Mullinakill' (Kilkenny Archaeological Society), who noted that although some graves were present within the church, none were located outside. These will not be impacted by the proposed grid connection, nor will the field within



which the church is located. The field is separated from the L3418 by a hedge field boundary, and is accessed by a gateway comprising two circular plan rubble limestone gate piers. This boundary aligns with that marked on the 1842 OS map, and defines the western edge of the site. This boundary will not be impacted by the proposed grid connection.

The construction of the current road is likely to have impacted on the potential archaeological resource, although it is acknowledged that it remains possible that excavation activities may have direct and negative (permanent) effects on currently unknown associated archaeological remains that survive below the road construction. Monitoring mitigation is detailed in Chapter 15, as whilst the sites themselves will not be directly impacted, there may be direct effects on archaeological features that extend beyond their known limits. The recorded sites will not be damaged, and the impact assessment allows for the identification and preservation (by record or in-situ) of any sub-surface features that may be exposed during the excavation of the grid connection trench. As the cable is laid within the existing road, there will be no indirect impacts to the setting of AH02.

A submission refers to the Pattern of Mullinakill, associated with a holy well. This is a recorded monument, although it is located c. 750m to the southwest of GCO One, and c. 5km to the north of GCO Two. The construction of GCO One or GCO Two is not predicted to impact upon the site, or the Pattern of Mullinakill.

2.3 THIRD PARTY SUBMISSION - MARTIN LAVELLE

This third party submission has been separated out due to the size of the submission provided. The sections herein have focused on the matters raised in this submission where we feel a response is warranted and may be helpful for ACP in making a determination on the grid connection application. Some themes in this submission are also already addressed in Sections 2.1 and 2.2.

It is however noted that this submission reflects the same matters raised in the same third party's wind farm application submission and most themes are specifically related to the wind farm development. These have been addressed in the applicants wind farm submissions response document. These wind farm application themes include the separation distance of turbines, positioning of turbines to roads, wake effects from turbines, noise impacts from turbines, no. of turbines on Coillte lands etc.

2.3.1 Strategic Infrastructure Development

This submission raises concerns that this project is not valid as an SID project due to output below 50MW. However, as noted within the planning documents and previous consultations with An Coimisiún Pleanála the installed output capacity range for this project is 57-72MW. The SID determination letter from An Coimisiún Pleanála was submitted as EIAR Appendix 1-3.

2.3.2 Drawing colouring/ Statutory Undertaker / Private lands along Grid Connection Option One / Trespassing concerns

Submissions by Save the South Leinster Way co Tara Heavey and Martin Lavelle raise concerns regarding Grid Connection Option (GCO) One and works trespassing on private lands. The red colouring for GCO One indicates the planning application red line boundary, within which the



grid connection works will be constructed within the public road. The red line shown on the planning drawings follows the public roads based on the Tailte Eireann background mapping.

It is confirmed, grid connection construction works will be in the public road. In response to the submission that traversing private properties will amount to trespass, it must be noted that landowner agreements are in place and a letter of consent was submitted with the planning application. In respect of the laying of the cables in the public road, the Developer will be entitled to make an application to the Commission for Regulation of Utilities (CRU) under S48 of the Electricity Regulation Act 1999, as amended for their consent to exercise the powers of ESB to lay electric lines under Section 51 and Section 52(1) of the Electricity (Supply) Act, 1927 as amended.

The letter from FuturEnergy Ireland and ART Generation (Manogate Ltd) to An Coimisiún Pleanála dated 21 November 2025, and as submitted as part of planning application (ACP Ref: 323958-25) confirms that the works will be undertaken by a statutory undertaker to facilitate connection to the national grid.

2.3.3 Planning Drawing Scales / Landowners

This submission queries the planning drawing scales. It is confirmed that the scales on the planning drawings submitted are correct and in compliance with scales agreed with ACP. It is believed the viewer may be reviewing printouts at a smaller page size, not the planning drawings scale submitted as part of the application which are legible to the naked eye and scaled correctly.

The relevant private landowner consent letters for this project were submitted with the planning application including for the two grid connection options.

2.4 CONCLUSION

This Submissions Response document has been prepared to address the Ballyfasy Grid Connection submissions made to ACP. As noted in the submitted planning application, design flexibility for the proposed grid connection was sought as this cannot be confirmed prior to grant of planning. ACP provided a design flexibility opinion on the 12th November 2025 (ACP case number – 322293-25) regarding the two grid connection options under Section 182G of the Planning and Development Act 2000, as amended and the Planning and Development Regulations 2001, as amended. This opinion was provided in EIAR Appendix 1-3.

It is confirmed that both grid connection options have been considered and fully assessed within the project EIAR.

A single grid connection will be constructed for the proposed project. The grid connection option constructed is subject to receiving a grid connection offer following EirGrid/ESBN post planning system studies.

The proposed grid connection forms part of the overall Ballyfasy Wind Farm project for which the EIAR was prepared and will support the connection of 57-72 MW of renewable electricity to the national network.

As noted within the submitted EIAR and Planning Statement, along with Section 1.3 of this report, this project is needed to assist Ireland in achieving its renewable energy and climate targets. The current global energy emergency due to the USA/Israel/Iran war and the recent



national Irish fuel protests also emphasise the need for Ireland to become more energy sustainable through renewable energy projects and a strengthened national grid.





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