TOBIN

Ballyfasy Wind Farm
Grid Connection
Planning Statement

December 2025

BUILT ON KNOWLEDGE

Document Control Sheet	
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Client:	Manogate Ltd
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EXECUTIVE SUMMARY

This Planning Statement has been prepared by TOBIN on behalf of Manogate Ltd., a development company supported by ART Generation and FuturEnergy Ireland. This Planning Statement accompanies a planning application for the proposed Ballyfasy Wind Farm Grid Connection, which will facilitate the transmission of renewable energy generated by the proposed Ballyfasy Wind Farm to the national grid. The proposed grid connection is located within the administrative boundaries of Kilkenny County Council.

A pre-application consultation meeting in accordance with the provisions of Section 182E of the Planning and Development Act, 2000, as amended ("PDA") was held with, the then, An Bord Pleanála representatives on 24th February 2025. Subsequently, the now, An Coimisiún Pleanála (ACP) determined that the proposed project falls within the scope of Section 182A of PDA and that a planning application for it should be made directly to ACP (ref. ABP-321814-25).

A design flexibility consultation meeting in accordance with the provisions of Section 182F(1) of the PDA, as amended, for the proposed grid connection options associated with the proposed Ballyfasy Wind Farm was held with An Bord Pleanála representatives on the 26th May 2025, with a formal determination issued thereafter (ref. ABP-322292-25).

The proposed grid connection will facilitate the generation of renewable energy through wind, thus addressing issues of security of supply and reduction of carbon emissions. As such, the proposed grid connection assists in meeting the National Climate Objective (i.e. achieving a competitive, low-carbon, climate resilient and environmentally sustainable economy by 2050), in full accordance with Section 3 of the Climate Action and Low Carbon Development Act (2015), as amended ("CALCDA").

The proposed grid connection will facilitate the construction and operation of the Ballyfasy Wind Farm, which is a crucial piece of strategic infrastructure necessary to achieve Ireland's national renewable energy targets.

1. PROJECT INTRODUCTION

For ease of reference, this report is structured as follows:

- Section 1 – Project Introduction
- Section 2 – Policy and Legislative Context
- Section 3 – Conclusion

This Planning Statement has been prepared by TOBIN on behalf of Manogate Ltd., a development company supported by ART Generation and FuturEnergy Ireland. This Planning Statement accompanies a planning application for the proposed Ballyfasy Wind Farm Grid Connection in County Kilkenny (see Figure 1-1).

The overall proposed project will be the subject of two applications for planning permission to An Coimisiún Pleanála. The first is for the wind farm along with the onsite 110 kV substation and works on the proposed Turbine Delivery Route (TDR) under Section 37E of the Planning and Development Act 2000, as amended.

The second application, to which this Planning Statement accompanies, is for two Grid Connection Options (GCO), as it comprises development for the purposes of electricity transmission, under Section 182A of the Planning and Development Act 2000, as amended.

This grid connection planning application is accompanied by a number of plans and particulars (listed in the accompanying cover letter), including an Appropriate Assessment Screening Report and Natura Impact Statement (NIS) and an Environmental Impact Assessment Report (EIAR). In the interest of efficiency and to avoid repetition, ACP is directed to the latter for detailed descriptions and assessments of the proposal.

It is also noted that a comprehensive Planning Statement has been submitted with the Ballyfasy Wind Farm application. Whilst acknowledging that each application must be judged on its own merits, we note that the subject proposed grid connection and the proposed wind farm development form part of a single project. As such, ACP is requested to have regard to the legal and policy imperatives supporting the wind farm development when considering the proposed grid connection.

1.1 SITE LOCATION

Two GCO options are being considered to connect the proposed wind farm to the national grid, however, only one grid connection option will be constructed for the project. Both grid connection options are located in County Kilkenny.

Proposed GCO One is an underground cable connection which will run from the proposed onsite 110 kV substation to the consented Castlebanny Wind Farm 110 kV substation. GCO One is 12 km in length and mainly follows the public road network northwards via local roads L7499 and L3417, before crossing at the junction at Three Friars Cross (regional road R704), continuing north along the L3418 local road, before travelling west over agricultural grassland and conifer plantation and terminating at the consented Castlebanny 110 kV substation.

Proposed GCO Two is 2 km in length and will connect the proposed onsite 110 kV substation to the existing 110kV Great Island-Kilkenny Line via a loop in connection. This grid connection

option travels from the proposed onsite substation, along the proposed site access roads for the wind farm, before connecting to the existing overhead line.

1.2 Project Description

A full and detailed description of the proposed project is provided in Chapter 2 of the Environmental Impact Assessment Report (EIAR). An overview of the proposed grid connection options is summarised below. The two GCOs are presented herein on Figure 1-2.

Grid Connection Option One

Grid Connection Option One will consist of 12 km of underground 110kV electrical cable, connecting the proposed Ballyfasy 110kV Substation to the proposed Castlebanny 110kV Substation in the townland of Castlebanny Co. Kilkenny.

The Grid Connection works will consist of the installation of 6 No. ducts in an excavated trench to accommodate 3 No. power cables, 1 No. fibre communications cable to allow communications between the Ballyfasy Wind Farm Substation and Castlebanny 110kV substation, 1 No. spare fibre communications cable and 1 No. earth continuity duct where required.

Due to the narrow width of the public road network in the area, the grid connection will be constructed primarily within the public road roadway. Sections of the grid connection will be constructed in private land at the beginning and the end of the route.

Grid Connection Option Two

Grid connection Option Two proposes to connect to the existing overhead line (Great Island-Kilkenny Line) via a loop in connection, and thus, all the proposed cabling and associated infrastructure will be located within the proposed Ballyfasy Wind Farm site.

1.3 Proposed Ballyfasy Wind Farm

The proposed wind farm to which the proposed grid infrastructure will be connected to will have an installed capacity of between 57 MW and 72 MW, which will improve the security of supply and reduce reliance on energy imports.

The 179,755 and 227,059 MWh of electricity produced by the proposed wind farm will be sufficient to supply the equivalent of between 40,313 and 50,922 Irish households with electricity per year.

The planning application for the proposed grid infrastructure seeks a 10-year planning permission. The grid connection will not be removed at the end of the useful life of the wind farm project as it will form part of the national electricity network.

1.4 Cable Works

Detailed Construction Methodology Reports for both GCOs are presented in Appendix 2-1 of the proposed project EIAR.

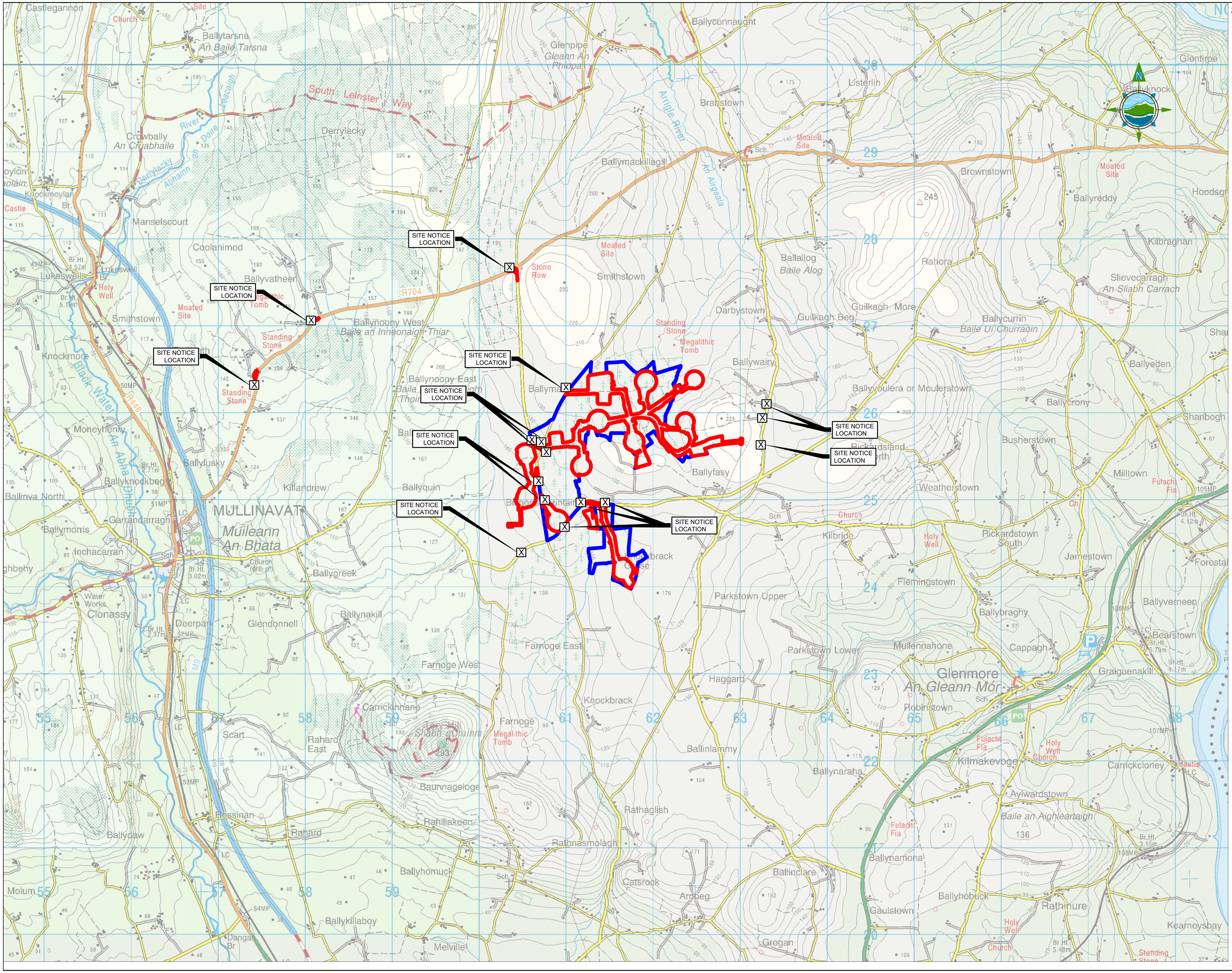
1.5 TRAFFIC

A Traffic Management Plan has been prepared for the proposed project and is included as Appendix 16-1 of the EIAR. This is a live document and will be updated ahead of construction to address the requirements of any relevant planning conditions, including any additional mitigation measures which are conditioned by An Coimisiún Pleanála, in the event approval is granted. Also, a confirmatory survey of road condition, including the condition of all water crossings will be carried out in advance of any works.

1.6 ENVIRONMENTAL ASSESSMENT

The proposed project (wind farm and grid connection) is in proximity to three European sites, namely Lower River Suir SAC, the River Barrow and River Nore SAC and the River Nore SPA. Horizontal directional drilling (HDD) will be implemented when installing the cable across watercourses. No instream works are proposed for any natural watercourse. HDD works will commence a minimum of 50 m from any watercourse.

ACP is referred to the EIAR and NIS accompanying this planning application, which finds that following the application of detailed mitigation measures, likely significant effects arising from HDD works will be avoided, and that the project will not adversely affect the integrity of any European site(s) either individually or in combination with other plans and projects in view of the sites' conservation objectives.



GENERAL LEGEND

PLANNING APPLICATION BOUNDARY

LANDS UNDER CONTROL OF DEVELOPER

SITE NOTICE LOCATION X

NOTES:

GRID CONNECTION APPLICATION TO BE SUBMITTED AS A SEPARATE APPLICATION TO AN COIMISIÚN PLEANÁLA.

NOTES:

1. DRAWINGS FOR PLANNING PURPOSES ONLY.
2. FIGURED DIMENSIONS ONLY TO BE TAKEN FROM THIS DRAWING.
3. GRID REFERENCES TO ITM.
4. ALL LEVELS SHOWN RELATE TO ORDNANCE SURVEY DATUM AT MALIN HEAD

Co. Kilkenny

Tailte Éireann 1:50,000 Sheet No's: 2410, 2412, 2610, 2612.

A	26.11.25	PLANNING ISSUE	MN	AM
Rev	Date	Description	By	Chkd.

Client: MANOGATE LTD.

Project: BALLYFASY WIND FARM PLANNING APPLICATION

Title: Figure 1-1: REGIONAL SITE LOCATION MAP

Scale @ A1: 1:20,000

Prepared by: M. Nolan | Checked by: A. Murphy | Date: November 2025

Drawing Status: Planning

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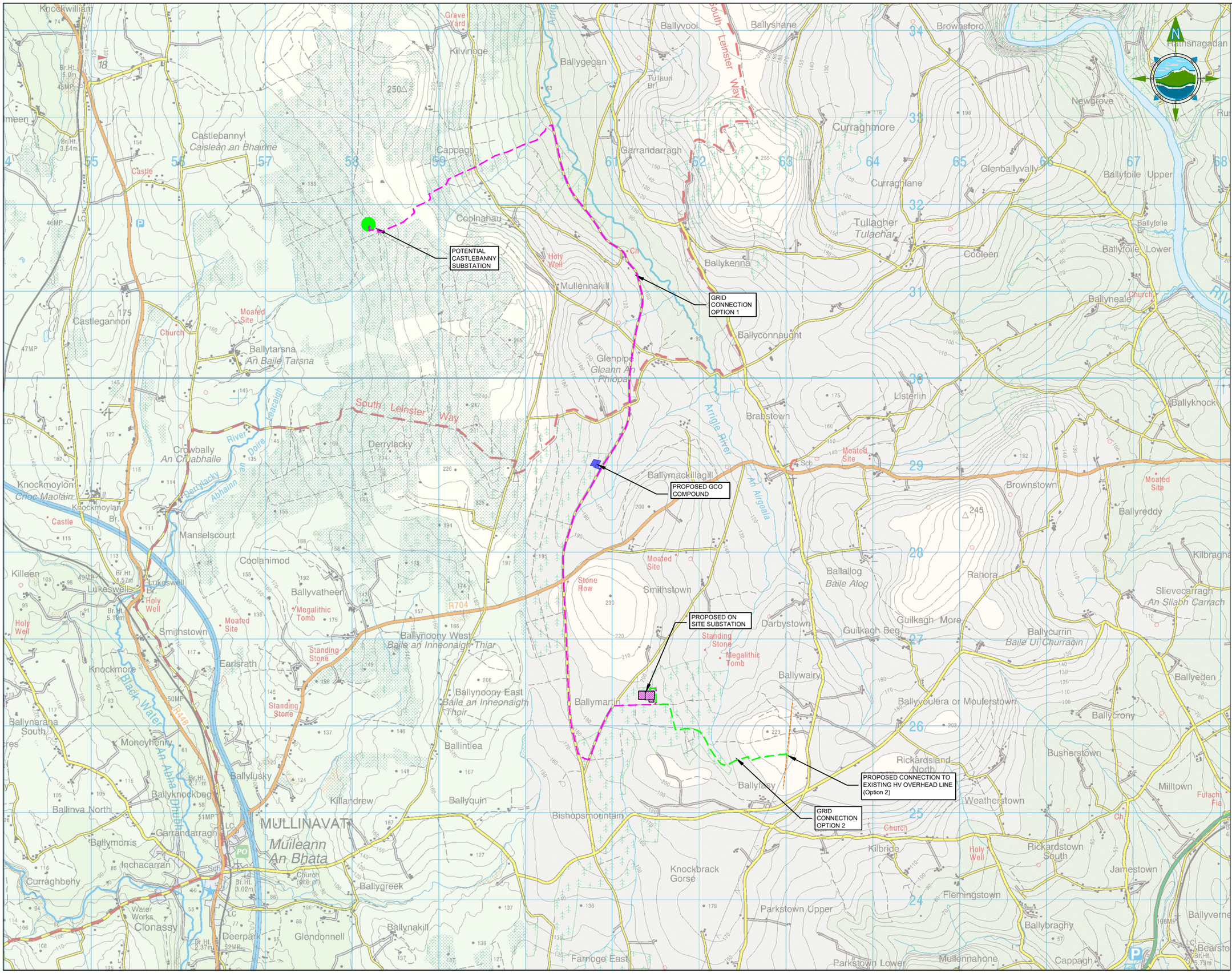
Drawing No.: 11474-2000

Revision: A



GENERAL LEGEND

STUDY AREA BOUNDARY

GRID CONNECTION OPTION 1

GRID CONNECTION OPTION 2

EXISTING HV OVERHEAD LINE

PROPOSED ON SITE SUBSTATION

POTENTIAL CASTLEBANNY SUBSTATION

PROPOSED ON SITE SUBSTATION

NOTES:

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4. ALL LEVELS SHOWN RELATE TO ORDNANCE SURVEY DATUM AT MALIN HEAD

Co. Kilkenny

Tailte Éireann 1:50,000 Sheet No's: 2410, 2412, 2610, 2612.

Rev	Date	Description	By	Chkd.
D03	25.09.25	DRAFT ISSUE FOR REVIEW	MN	AM
D02	09.06.25	DRAFT ISSUE FOR REVIEW	MN	AM
D01	13.03.25	DRAFT ISSUE FOR REVIEW	MN	AM

Client: MANOGATE LTD.

Project: BALLYFASY WIND FARM PLANNING APPLICATION

Title: Figure 1-2: GRID CONNECTION OPTIONS

Scale @ A1: 1:20,000

Prepared by: M. Nolan | Checked by: A. Murphy | Date: March 2025

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Revision: D03

2. POLICY AND LEGISLATIVE CONTEXT

This section of the report summarises the most relevant legislation and planning policy matters to be considered by ACP when assessing the proposed grid connection development. A comprehensive overview of the international legislative and policy context supporting the Ballyfasy Wind Farm Project as a whole is set out in Chapter 4 of the EIAR and the Planning Statement submitted with the Ballyfasy Wind Farm application. The summary below will confine itself to a summary of the national context in the interest of brevity and to avoid repetition.

2.1 CLIMATE ACTION AND LOW CARBON DEVELOPMENT ACT 2015 (AS AMENDED)

In addition to its duties under the Climate Action and Low Carbon Development Act 2015 (CALCDA) as amended, and other EU and national law, as a "relevant body", ACP has particular duties under the section 15 of the CALCDA which provides as follows:

> *15. (1) 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*

The CALCDA 2015 was amended by the Climate Action and Low Carbon Development (Amendment) Act 2021, transposing Ireland's commitment to climate neutrality into legislation by establishing a legally binding framework that mandates carbon budgeting, sectoral emissions ceilings, and annual climate action plans to ensure the country meets its national, EU, and international climate obligations. Summary of Irelands legally binding targets under the 2021 Act are as follows:

- **Net-Zero Emissions by 2050**: Ireland is legally committed to achieving a climate-neutral economy no later than the end of 2050.
- **51% Reduction in Greenhouse Gas Emissions by 2030**: Compared to 2018 levels, Ireland must reduce total emissions by 51% by 2030, as part of its medium-term climate goal.
- **Carbon Budgets**: The Act introduces five-year carbon budgets that cap total emissions across the economy. These budgets are binding and must align with the long-term targets.
- **Sectoral Emissions Ceilings**: Each sector (e.g., transport, agriculture, energy) is assigned a specific emissions ceiling within the carbon budget period, making individual ministers accountable for delivery.
- **Annual Climate Action Plans:** The government must publish annual plans detailing how each sector will meet its targets, ensuring transparency and continuous progress.

- **Local Authority Climate Action Plans:** Every local authority is required to prepare a five-year climate action plan covering both mitigation and adaptation.

2.2 Climate Action Plan 2025

The Climate Action Plan 2025 (CAP25) is the third statutory update which serves as a roadmap as to how Ireland will achieve its legally binding national climate objective via carbon budgets and sectoral emissions ceilings. Notably, this plan says that Ireland must now focus on "turbocharging delivery". The Plan includes the following key provisions in relation to renewable electricity, and in particular, to onshore wind and grid infrastructure development:

- Renewable electricity targets of 50% by 2025 and 80% by 2030;
- Onshore wind installed capacity of 6GW by 2025 and 9GW by 2030;
- 51% reduction in emissions to 2030, and to achieving climate neutrality by no later than 2050; and
- A key action is to 'accelerate renewable energy generation' in accordance with the grid transmission infrastructure policies within the National Planning Framework.

Similar to EU policy, national policy is clearly calling for the rapid acceleration in deployment of renewable electricity projects.

The Climate Action Plan's binding target of 9 GW of onshore wind by 2030 is widely acknowledged to be in jeopardy, and the latest EPA Greenhouse Gas Emissions Projections Report finds that Ireland is further from its 2030 national climate target compared to previous assessments[1].

It has taken Ireland over 20 years to deliver 4.3 GW of onshore wind. The Government is now asking the sector, supported by all relevant national stakeholders (relevant bodies), to more than double that in the next 7 years. This is a proportionate response to the twin climate and energy security / energy cost crises. The emphasis on urgency and the necessity to scale up ambition for renewable energy development in the Climate Action Plan is completely consistent with International and European policy and legislation contained in the Directive (EU) 2023/2413. These ambitions have all been effectively restated in CAP25.

2.3 National Planning Framework (Revised 2025) & RSES for the Southern Region

The need for increased renewables at appropriate locations across the country is clear in national and regional spatial planning frameworks and strategies. The revised National Planning Framework (NPF) 2025, states that it is an objective to:

> *"Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050." (Objective 70)*

Outlined below are key policy objectives from the Revised National Planning Framework (NPF), which constitute legal obligations under CALCDA, in support of the proposed grid infrastructure and associated wind farm referenced in this planning application:

- **National Policy Objective 71** Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development.

- **National Policy Objective 72** Support an all-island approach to the delivery of renewable electricity through interconnection of the transmission grid.

Furthermore, National Strategic Outcome 8 of the NPF recognises that, *'new energy systems and transmission grids will be necessary for a more distributed, more renewables-focused energy generation system, harnessing both the considerable on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy'*. It further states that *'the development of onshore and offshore renewable energy is critically dependent on the development of enabling infrastructure including grid facilities to bring the energy ashore and connect to major sources of energy demand.'*

More recently in 2025, the Government has approved a landmark €3.5 billion investment in electricity grid infrastructure for the period 2026–2030, as part of the National Development Plan (NDP)[1]. This represents the largest single investment in Ireland's electricity network to date and is aimed at strengthening energy security, supporting economic growth, and accelerating the transition to a renewables-led energy system. The investment includes €1.5 billion for ESB Networks and €2 billion for EirGrid, enabling both entities to expand onshore and offshore transmission and distribution infrastructure.

This policy commitment is directly tied to Ireland's climate and energy targets, including the goal of generating 80% of electricity from renewable sources by 2030. Achieving this requires the construction of 9 GW of onshore wind, 8 GW of solar, and 5 GW of offshore wind capacity all of which depend on a modern, resilient electricity grid. The enhanced grid will facilitate the connection of new renewable generation, and positioning Ireland to become an energy exporter and meet its climate obligations.

The Regional Spatial & Economic Strategy (RSES) published by the Southern Regional Assembly states:

> *"It is an objective to support the sustainable development of renewable wind energy (on shore and off shore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines." (RPO 99)*

Additional policies in support of the proposed grid infrastructure include:

- **RPO 96 Integrating Renewable Energy Sources** It is an objective to support the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure to integrate a renewable energy sources and ensure our national and regional energy system remains safe, secure and ready to meet increased demand as the regional economy grows.
- **RPO 100 Indigenous Renewable Energy Production and Grid Injection** It is an objective to support the integration of indigenous renewable energy production and grid injection.
- **RPO 219 New Energy Infrastructure** It is an objective to support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers (subject to appropriate environmental assessment and the planning process) to ensure the energy needs of future population and economic expansion within designated growth areas and across the Region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs

[1] Minister O'Brien welcomes €3.5 billion investment in Ireland's electricity infrastructure

- **RPO 221 Renewable Energy Generation and Transmission Network** a. Local Authority City and County Development Plans shall support the sustainable development of renewable energy generation and demand centres such as data centres which can be serviced with a renewable energy source (subject to appropriate environmental assessment and the planning process) to spatially suitable locations to ensure efficient use of the existing transmission network; b. The RSES supports strengthened and sustainable local/community renewable energy networks, micro renewable generation, climate smart countryside projects and connections from such initiatives to the grid. The potential for sustainable local/community energy projects and micro generation to both mitigate climate change and to reduce fuel poverty is also supported; c. The RSES supports the Southern Region as a Carbon Neutral Energy Region.
- **RPO 222 Electricity Infrastructure** It is an objective to support the development of a safe, secure and reliable supply of electricity and to support and facilitate the development of enhanced electricity networks and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this plan under EirGrid's (2017) Grid Development Strategy (subject to appropriate environmental assessment and the planning process) to serve the existing and future needs of the Region and strengthen all-island energy infrastructure and interconnection capacity.
- **RPO 224 Delivery of Energy Networks** Local Authorities shall work in partnership with existing service providers to facilitate required enhancement and upgrading of existing infrastructure and networks (subject to appropriate environmental assessment and the planning process) and support the safeguarding of strategic energy corridors from encroachment by other developments that could compromise the delivery of energy networks.

The proposed grid connection development will facilitate the Ballyfasy Wind Farm project, the location for which has been evaluated as having a suitable wind resource. It has also been assessed against each of the topics contained in the EIAR and adverse residual environmental impacts are avoided demonstrating the appropriateness of the site in line with National and Regional planning objectives.

Furthermore, the Natura Impact Statement (NIS) assessment considers both grid connection options as part of the overall evaluation and concludes that neither option will result in adverse effects on the integrity of any European site, including Special Areas of Conservation (SACs) or Special Protection Areas (SPAs), either alone or in combination with other plans or projects. The proposed grid connection development is therefore aligned with the NPF and RSES.

2.4 GRID IMPLEMENTATION PLAN 2023–2028

The Grid Implementation Plan 2023–2028, published by EirGrid in September 2024, provides a comprehensive national framework for the development of Ireland's electricity transmission infrastructure. It is designed to support the integration of renewable energy sources and meet Ireland's climate and energy targets, including 80% renewable electricity by 2030 and carbon neutrality by 2050. The plan aligns with key national policies such as the Climate Action Plan 2023, the Climate Action and Low Carbon Development Act 2021, and the National Planning Framework. It outlines a strategic roadmap for grid reinforcement, expansion, and modernization, including offshore wind integration, interconnection with neighbouring countries, and regional development.

Specific measures and policies within the plan reinforce Ireland's commitment to enabling renewable energy injection into the grid. These include the adoption of innovative technologies such as HVDC, modular power flow control, and demand-side management; the implementation of a six-step development framework balancing technical, environmental, and social factors; and the designation of EirGrid as the offshore transmission asset developer.

The policies relevant to the proposed grid infrastructure development are as follows:

Table 2-1: Policy Compliance Response

Policy/Objective	Policy Compliance Response
ENVP1: To uphold best environmental practice in the design and appraisal of onshore and offshore grid development, considering impacts onshore, offshore, cumulatively and across state boundaries where relevant.	The proposed grid connection infrastructure, comprising two route options associated with the Ballyfasy Wind Farm development, has been designed and appraised in accordance with best environmental practice, consistent with the objectives of Policy ENVP1. While the proposed infrastructure is entirely onshore, the appraisal has also taken into account cumulative effects in combination with other existing and permitted energy and infrastructure developments in the region. This includes consideration of potential interactions with other grid assets, renewable energy projects, and land use changes, as documented in the EIAR and NIS. The route selection process was informed by a constraints-led approach, incorporating environmental, technical, and planning criteria to ensure that the infrastructure avoids sensitive receptors and minimises residual effects.
ENVP4: To require the use of sustainable urban drainage systems in all new grid developments where appropriate.	A Surface Water Management Plan (SWMP) has been prepared for the project and is included as Appendix 2-8 to the EIAR. The project surface water drainage system follows the recommendations of sustainable urban drainage systems (SuDS) and uses SuDS measures, as detailed within the SWMP.
ENVP6: To seek to preserve and maintain air quality in accordance with good practice and relevant legislation in the construction of grid development projects onshore and offshore.	Air quality considerations have been integrated into the EIAR, which includes a dedicated assessment of potential emissions and dust generation during construction activities. Both route options have been evaluated for their potential to impact local air quality, particularly in relation to construction traffic, excavation works, and material handling. Mitigation measures, including dust suppression techniques, vehicle emission controls, and construction best practices have been proposed to ensure compliance with relevant national legislation and environmental standards. The project will be implemented in accordance with recognised good practice, including adherence to EPA guidance and applicable air quality thresholds. Monitoring protocols will be established where

	necessary to ensure that air quality is maintained throughout the construction phase.
ENVP7: To facilitate new technologies which minimise noise emissions on onshore and offshore grid development.	Both route options have been assessed for potential noise impacts during construction and operation phases as part of the EIAR. GCO One, which is fully underground, inherently reduces operational noise emissions and avoids the need for above-ground installations that may generate noise emissions. GCO Two includes a partial above-ground loop in connection, which has been designed using low-noise components and will be subject to mitigation measures to ensure compliance with noise thresholds. Construction-related noise will be managed through best practice measures, including restricted working hours, noise monitoring, and the use of low-emission machinery.
ENVP8: To seek to preserve and maintain noise quality (including underwater noise) in accordance with good practice and relevant legislation.	
ENVO5: That all grid development proposals and, in particular, transmission substation developments, shall carry out, to an appropriate level of detail, a site-specific Flood Risk Assessment that shall demonstrate compliance with all current Guidelines, standards and best practice. The Flood Risk Assessment shall pay particular emphasis to residual flood risks, site-specific mitigation measures, flood-resilient design and construction and any necessary management measures.	A detailed FRA has been prepared for the proposed project, consistent with the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009), and other relevant national standards and best practice guidance. The FRA evaluates both grid route options as well as the onsite substation with particular emphasis on residual flood risks, site-specific mitigation measures, and the incorporation of flood-resilient design and construction techniques. The assessment confirms that the substation infrastructure is not located within areas of high flood risk. The grid connections are predominantly installed underground, which provides resilience against flood impacts and makes them suitable for placement within any flood zone. These connections will primarily follow the alignment of site access roads and the existing local road network. It is advised that construction activities related to the grid connection be avoided during active local flood events to ensure safety and minimize disruption.
CLIMP2: To support, through all activities and, in particular, connection of low-carbon and renewable energy generation onshore and offshore, delivery of the Government's target of up to 80% electricity consumption generated from renewable energy sources by the year 2030.	The proposed grid connection infrastructure is a critical component in facilitating the integration of renewable energy generated by the proposed Ballyfasy Wind Farm to the nation grid, thereby contributing to the decarbonisation of Ireland's electricity supply. By enabling the connection of renewable generation to the grid, the project aligns with the Government's target of achieving up to 80% electricity consumption from renewable sources by 2030, as set out in national climate and energy strategies.

TP1: To promote and facilitate the sustainable development of a high-quality transmission grid to serve the existing and future needs of the country, in accordance with EirGrid's strategy and the Shaping Our Electricity Future Transmission Network Analysis.	The proposed grid infrastructure aligns with EirGrid's strategic framework and the *Shaping Our Electricity Future Transmission Network Analysis*, by contributing to grid resilience, enabling renewable integration, and addressing both current and future electricity demand.
PCP2: To have regard to precedent arising from decisions of the Competent Authorities and of the High Court in Judicial Review of decisions, relating to the planning and consenting of grid development projects.	The proposed grid connection infrastructure, comprising two route options associated with the proposed Ballyfasy Wind Farm, has been prepared with full regard to precedent established through decisions of the Competent Authorities and the High Court in Judicial Review proceedings relating to grid infrastructure planning and consenting.
PDP2: To promote sustainable grid development by balancing complex and/or competing technical, economic, environmental, social and deliverability goals and priorities in decision-making.	The proposed grid connection infrastructure, comprising two route options associated with the proposed Ballyfasy Wind Farm, reflects a balanced and sustainable approach to grid planning by integrating technical feasibility, environmental protection, economic viability, and social considerations.

2.5 KILKENNY CITY AND COUNTY DEVELOPMENT PLAN 2021-2027

The statutory development plan pertaining to the subject site is the Kilkenny City and County Development Plan 2021-2027 (the "CDP"). On 15th October 2021, the Minister of State at the Department of the Housing, Local Government and Heritage, consequent to a recommendation made to him by the Office of the Planning Regulator notified Kilkenny County Council of his intention to issue a Direction to the Kilkenny City and County Development Plan 2021-2027.

In accordance with the relevant section of the Planning and Development Act 2000, those parts of the Kilkenny City and County Development Plan 2021 – 2027 Plan referred to in the notice shall be taken not to have come into effect, been made or amended; namely the following section under Chapter 11, Renewable Energy,

- Section 11.4 Kilkenny Targets,
- Section 11.5.1 Current status and targets and
- Figure 11.4 Wind Strategy areas.

As such, the policies listed below relating to the proposed grid infrastructure are understood to remain in effect.

Section 10.3.1 of the CDP recognises that projects may arise to facilitate electricity demand growth and the connection of new electricity generation projects and states that:

> *" The Council will support the development of a safe, secure and reliable supply of electricity and to support and facilitate the development of enhanced electricity networks and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this plan".*

The following objective directly supports the proposed grid connection infrastructure:

- **Objective 11A** To support and facilitate the provision of energy in accordance with Ireland's transition to a low carbon energy future by means of the maintenance and upgrading of electricity and gas network grid infrastructure and by integrating renewable energy sources and ensuring our national and regional energy system remains safe, secure and ready to meet increased demand as the regional economy grows over the period of the plan.

According to Section 10.3.2 of the CDP, which outlines Development Management Requirements for Grid infrastructure, Kilkenny County Council will facilitate the provision of energy networks in principle, provided that it can be demonstrated that the requirements listed in the table below are met. The table below outlines the proposed grid infrastructure development compliance against CDP requirements for grid infrastructure.

Table 2-2: Compliance with CDP development management requirements

Development Management Requirements	Compliance
10.3.1 The National Transmission/Distribution network The Council will support the development of a safe, secure and reliable supply of electricity and to support and facilitate the development of enhanced electricity networks and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this plan.	Both grid connection options have been designed to integrate seamlessly with the existing electricity network infrastructure, thereby contributing to the resilience and capacity of the national grid. The development will support the transition to renewable energy sources in line with national and regional climate and energy targets. Both route options have been assessed to ensure technical feasibility, environmental compliance, and alignment with spatial planning objectives. The infrastructure will not only support the operational viability of the wind farm but also contribute to the strategic expansion of the electricity network during the lifetime of the Development Plan.
10.3.2 Kilkenny County Council will facilitate the provision of energy networks in principle, provided that it can be demonstrated that –	
• the development is required in order to facilitate the provision or retention of significant economic or social infrastructure;	This infrastructure directly supports the provision of significant economic and social infrastructure by enabling the integration of clean energy into the transmission/distribution network, thereby contributing to national decarbonisation targets and energy security. By facilitating the operational viability of the wind farm, the grid connection supports long-term economic investment in rural areas, job creation during construction and operation phases, and the delivery of low-carbon energy to consumers. Furthermore, the infrastructure contributes to the retention and strengthening of the electricity network, ensuring continued reliability and resilience in the face of increasing demand and climate-related challenges.
• the route proposed has been identified with due consideration for social, environmental and cultural impacts;	A multidisciplinary assessment process informed the route selection, incorporating constraints mapping,

• the design is such that will achieve least environmental impact; • the lines should be planned to avoid areas of high landscape sensitivity;	stakeholder engagement, and specialist input across ecology, archaeology, landscape, and land use. Both route options have been evaluated through the EIAR and NIS, ensuring that sensitive receptors—including residential communities, designated habitats, and cultural heritage features—were appropriately considered and avoided where possible. The routing strategy prioritised minimising disruption to local communities, avoiding areas of high ecological value, and preserving the integrity of archaeological and cultural landscapes.
• preference should be given to undergrounding services where appropriate	GCO One proposes a fully underground cable route, designed to minimise visual and landscape impacts, avoid sensitive receptors, and reduce potential ecological disturbance. This option reflects best practice in infrastructure planning and aligns closely with the policy preference for undergrounding, particularly in areas of high environmental or landscape sensitivity. GCO Two includes a partial above-ground loop section, which has been incorporated based on technical and operational requirements. The above-ground element has been carefully sited to avoid areas of high visual prominence and environmental sensitivity and is supported by mitigation measures to reduce its impact. The remainder of GCO Two is undergrounded, ensuring that the overall design still reflects a strong commitment to minimising environmental and social impacts.
• the proposed infrastructure complies with all internationally recognised standards with regard to proximity to dwellings and other inhabited structures including best practice and new accepted research on the impacts on health; • new power lines and power installations should be sited in accordance with the requirements of the "Health Effects of Electromagnetic Fields" Report issued by the Department of Communications, Marine and Natural Resources in 2007, and	The proposed grid connection infrastructure, comprising two route options to facilitate the export of electricity from the associated wind farm, has been designed in accordance with all applicable national standards and guidance relating to the proximity of electrical infrastructure to dwellings and other inhabited structures. The siting and design of both options have been informed by the recommendations set out in the "Health Effects of Electromagnetic Fields" report issued by the Department of Communications, Marine and Natural Resources in 2007. GCO One proposes a fully underground cable route, which inherently minimises electromagnetic field (EMF) exposure and visual impact. GCO Two includes a partial above-ground loop section, which has been carefully sited to ensure appropriate separation from residential properties and sensitive receptors, in line with the precautionary principles outlined in the 2007 report. Both options have been assessed to ensure that the infrastructure does not pose any risk to public health and complies with best practice in terms of EMF management, noise, and amenity protection.

• where impacts are inevitable, mitigation features have been included.	Chapter 19 of the EIAR submitted with this application provides a summary of the findings of this EIAR, based on the design and mitigation measures identified within the technical assessments of this report. The schedule below details the measures upon which the findings of this EIAR have been based and are an integral part of the proposed project. During the pre-construction, construction, operational and decommissioning phases of the project, all personnel working on the project will be required to be responsible for the environmental control of their own work and to perform their duties in accordance with the requirements and procedures of the CEMP (see Appendix 2-6 of the EIAR).
• where considered necessary by the Council, a Visual Impact Assessment and a Landscape Impact Assessment will be required for significant Grid Infrastructural projects.	The proposed grid connection infrastructure, comprising two route options associated with the wind farm development, has been treated as a significant grid infrastructural project and has therefore been subject to detailed visual and landscape impact assessment in accordance with planning policy. Both route options have been assessed through a Landscape and Visual Impact Assessment (LVIA) as part of the EIAR. The LVIA considered factors such as landscape character, sensitivity, visual receptors, and cumulative impacts, and informed the design and refinement of the proposed infrastructure. GCO One, which is fully underground, presents minimal visual impact and avoids intrusion into sensitive landscape areas. GCO Two, which includes a partial above-ground loop, has been carefully sited to reduce visibility and avoid areas of high landscape sensitivity, with mitigation measures proposed to further minimise residual effects.
• That existing grid infrastructure should be used where possible in preference to erecting new grid infrastructure.	GCO One proposes to connect into the consented Castlebanny 110kV Substation. GCO Two proposes to connect with the existing Great Island to Kilkenny 110kV overhead line which passes through the site. Only one grid connection will be construction. Both grid connection options have considered the existing grid infrastructure in the area and this will be used when connecting the project to the national grid.
• Any proposed development must avoid impact on any Special Area of Conservation.	The proposed grid connection infrastructure, comprising two route options to facilitate the export of electricity from the associated wind farm, has been designed to avoid any direct or indirect impact on designated Special Areas of Conservation (SACs). Both route options were subject to detailed ecological and planning constraints analysis, and have been refined to ensure that no part of the infrastructure intersects or encroaches upon any SAC. The NIS prepared confirms that the proposed project will not result in adverse effects on the integrity of any SAC, either alone or in combination

	with other plans or projects, in accordance with the requirements of the Habitats Directive. Where proximity to designated sites occurs, appropriate mitigation measures have been incorporated to prevent potential indirect impacts, such as hydrological changes, disturbance during construction, or habitat fragmentation.

Additionally, Section 11.5.3 of the CDP highlights the importance of considering grid connection details and associated visual impacts when assessing wind energy developments. The Ballyfasy Wind Farm grid connection options have been carefully planned to integrate seamlessly with the wider project, ensuring that visual and environmental impacts are minimised. The entirety of the proposed project has been thoroughly evaluated within both the EIAR and the NIS accompanying this application. Overall, the proposed grid infrastructure demonstrates a responsible and policy-aligned approach to energy development, supporting both national climate objectives and local planning requirements.

3. CONCLUSION

The proposed Ballyfasy Wind Farm, which this grid connection development will facilitate, has the potential to generate between 57 MW and 72 MW of renewable electricity annually, which is enough to power between 40,313 and 50,922 Irish households with electricity per year. This contribution is significant in the context of Ireland's legally binding target of 9 GW of installed onshore wind capacity by 2030. The Ballyfasy Wind Farm project will support national climate objectives and enhance energy security by reducing reliance on imported fossil fuels.

Further national policy support is provided by the Grid Implementation Plan 2023–2028, published by EirGrid, which sets out a strategic framework for grid reinforcement, expansion, and modernisation to enable Ireland's transition to a low-carbon energy system.

In addition to its strategic national importance, the proposed GCOs One and Two are fully aligned with the Kilkenny City and County Development Plan 2021–2027. Section 10.3.1 of the CDP explicitly supports the development of enhanced electricity networks and new transmission infrastructure to meet growing energy demand and to facilitate renewable energy generation. Objective 11A of the CDP further reinforces this by committing to the integration of renewable energy sources and the upgrading of grid infrastructure to support Ireland's transition to a low-carbon future. The proposed GCOs One and Two meet all Development Management Requirements outlined in Section 10.3.2 of the CDP, including prioritisation of underground cabling under GCO One while GCO Two minimises any over ground cabling components. The project design prioritises the avoidance of areas with high landscape sensitivity, ensures compliance with health and safety standards, and incorporates mitigation measures to address any unavoidable impacts. It also avoids Special Areas of Conservation (SAC) and, where feasible, utilises existing infrastructure corridors to minimise disruption and reduce environmental impact.

By enabling the delivery of clean electricity from the Ballyfasy Wind Farm to the national grid, the proposed grid connection will directly support Kilkenny County Council in fulfilling its obligations under the CDP and national climate legislation. It represents a responsible, policy-compliant infrastructure investment that contributes to both local and national renewable energy targets. In light of its strategic importance, environmental safeguards, and alignment with statutory planning frameworks, it is respectfully submitted that the proposed grid connection development merits approval.

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