

Cllr. Tomás Breathnach

Forge Road, Narabane, Kilmacow, Co. Kilkenny
Phone: 051 885483 Mobile: 086 0704114
Email: breathnachomas@eircom.net
www.labour.ie/tomasbreathnach



An Comisiún Pleanála
64 Marlborough Street
Rotunda
Dublin
D01 V901

Date : 13th February '26
Ref : 26-245

Re : Strategic Infrastructure Development application 323958-25

A chara,

I would be grateful if the attached submission was placed on the above planning file for the installation of Grid Connection for wind turbines at Ballyfasy in South Kilkenny.

My submission on 323957-25, dated 2nd February '26 refers. See enclosed.

Also enclosed is a cheque for €50 being the appropriate fee.

Thank you for your attention to this matter. I look forward to hearing from you.

Is mise, le meas

Tomás Breathnach

AN COIMISIÚN PLEANÁLA	
LDG-	086628-26
ACP-	
13 FEB 2026	
Fee: €	50 Type: Chq
Time:	9:15 By: Reg post

- 1 This proposal is for works on a grid connection to facilitate a grid connection for 10 Wind Turbines subject to application 323957-25 at Ballyfasy in South Kilkenny. At the outset I think it is unfair that a submission needs to be made a second time as both applications refer to the one project and are intrinsically linked. My understanding is that both will be assessed as one and hence one submission only should be required as part of the consultation process.
- 2 Having made a submission on 323957-25 consistency impels me to make this submission as the Grid Connection facilitates a project on which many local people have expressed concerns to me. I respectfully ask that this submission be read in conjunction with its sister submission.
- 3 As this is one project the concerns referred to already apply in this case. I allude to these concerns as follows:
 - a. The absence of clear and agreed guidelines
 - b. The concentration on wind turbines to provide renewable energy, especially their intended concentration in South-East Kilkenny.
 - c. Deferral of the review of the County Development Plan. The review would be currently underway if the existing cycle was in place. The review would have looked at built and planned provision in relation to local, regional and national targets for energy generation and use.
- 4 There are concerns about the number and scale of construction traffic required for excavation foundation and base construction for both the turbines and the grid connection. Likewise, there is concern about impacts on the structure of the local road network and about possible impacts on the water table and local water courses.
- 5 Local roads generate their own traffic. There are a number of schools in close proximity to the site of the wind turbines and grid connection and/or on the access roads to them. These include Listerlin, Ballyfacey, Bigwood, Glenmore, Mullinavat and Slieverue. There are also secondary schools accessed along these roads including towards Ballyhale, New Ross, Ferrybank and Waterford.

It is a rural part of South East Kilkenny and there is always an array of agricultural vehicles on the local roads and at all times of the day. The R704 is a very busy regional road connecting Mullinavat and the M9 to New Ross.
- 6 There are concerns that much roadside work will be required for trenching to accommodate ducting to transfer power from the turbines to the grid installation and then onwards to the receiving installation at Castlebanny and/or Great Island.
- 7 My understanding is that Castlebanny Wind Farm has come through the planning process. Should works begin at that location then there will be a greater concentration of vehicles, traffic conflict, roadside works and potential inconvenience and hazard.

- 1 The Wind Energy Development Guidelines date from 2006. Interim guidelines were issued in 2017 and draft guidelines were issued in 2019. This creates a confused set of criteria by which an application for a windfarm can be assessed.

A moratorium should be in place so that there can be clarification on these criteria. The Department for Housing, Local Government and Heritage has stated that no moratorium will be considered while the guidelines are being finalized.

Given the scale in terms of height and the extent of the area in which these windfarms operate there should be a consultation process so that the new guidelines can reflect the views of all. The absence of the updated guidelines is a major grievance in this process.

- 2 Reference is made to the requirement to deliver on renewable energy targets to meet with Ireland's Climate Change commitments. Not all renewable energy targets need to be met solely by the generation of energy from wind turbines and certainly not from wind turbines on the scale proposed in this application.

- 3 Kilkenny already has a large number of wind turbines within its boundary. From my researches I note the following:

Built	Bruckana	8	North-West	Built	
	Foylature	7	North-West	Built	15
	Ballybeagh	7	North-West	Built	22
	Ballymartin	3	South-East	Built	25
	Ballymartin	4	South-East	Built	29
	Rahora	5	South-East	Built	34
	Lisdowney	4	North-West	Built	38
	Ballinclare	1	South-East	Built	39
Granted	Pinewood		Laois		
	White Hill	3	North-East	Granted	42
	Seskin		Carlow		
Under Appeal	Seskin	6	North	Appeal	48
	Briskalagh	7	West	Appeal	55
Judicial Review	Castlebanny	21	South East	JR	76
Live	Ballyfasy	10	South-East		86

Pre-Planning	Freneystown	8	North-East	Pre-Planning	94
	Killoshulan	13	North-West	Pre-Planning	107
	Glashare	13-18	North-West	Pre-Planning	120
	Fassa	13-20	North-East	Pre-Planning	133
Proposed	Castlegarden	5	East	Proposed	138

The above table indicates that 39 turbines have been built and that 99 are at different stages in the planning process. I understand that some of them may not go all the way to installation and some wind turbines in existing use may cease to operate. However, other applications not yet included in the above may proceed into a planning process in the future.

- 4 South-East Kilkenny has 13 wind turbines in the existing built category above. It represents 33% of the total for the county.

If all wind turbines under all the categories included above proceed to installation then South East Kilkenny will have 39% of the wind turbines in the county.

- 5 According to the Wind Energy Ireland (WEI) website a typical recently installed wind turbine in Ireland will generate 4mw of electricity. If this amount is applied to the already built category then the amount generated is 156mw. (Please note I accept this may overstate the output of turbines based on older technology. According to WEI the average output per wind farm is 15.18mw which would equate 106mw for 7 built wind farms.)

- 6 Chapter 11 of Kilkenny County Council's City & County Development Plan has remained effectively suspended since 2021. In it Kilkenny County Council set a target for the county to provide electricity 100% from renewable resources. This was then, and continues to be, a laudable objective which places the Council to the forefront of climate change initiative and action.

The concept was to strive to achieve self-sufficiency as a county in the provision of electricity from renewable resources so as not to be dependent on the import of electricity generated elsewhere into the county. As noted above the concept refers to all acceptable methods of generating electricity from renewable resources, including hydro and solar.

The 3 Counties Energy Agency estimate in the County Development Plan stated that by 2030 the county will require 633GWH of electricity. This equates to 253mw of electricity.

As per the outputs referred to above on the existing built wind farms Kilkenny is well on the way to achieving the 2030 target. If 100mw is being provided by the existing built wind farms then, at a typical output of 4mw per turbine only an additional 40 of the advanced technology turbines are required. The requirements for beyond 2030 can be included in deliberations as part of the review of the current County Development Plan and as part of the preparation for the next.

The laudable objective of providing for the county's energy needs from renewable resources was due to a local authority having a realistic, but idealistic, vision for its citizens. It was not intended as a base, which once achieved, could be used as justification for the export of electricity into the grid network and onto the energy market for profitable return.

- 7 People locally have genuine concerns about the health impacts of wind turbines, especially due to their scale, number and the proximity to their homes. Their concerns revolve around noise, disturbance of sleep and shadow flicker. They have not been assuaged as part of this planning process.
- 8 There are too genuine concerns for the impact of this proposal on the environment of this unspoilt area of South-East Kilkenny. A huge amount of heavy traffic hauling heavy loads of equipment and concrete will enter the area. Excavations and foundations may lead to contamination of water courses and disruption of the water table. There are also concerns about the removal of hedgerows, trees and vegetation to facilitate this proposal. Local wildlife including animal and birdlife has flourished relatively undisturbed in the fields and woodlands of Bishop's Mountain, Ballywairy, Knockbrack, Farnogue and Ballyfacey until now. This proposal represents a shock to that undisturbed existence.
- 9 Many of the townlands have families who have lived in them for generations. Others have been attracted to the area by proximity of family and/or the character of the terrain and landscape. This proposal seeks to overwhelm their sense of place, connection and attachment. Those who were attracted by the landscape will feel it has been taken from them. Others who might have considered moving to the area now, or at some time in the future, will rethink and hesitate to make such a move.
- 10 There are already significant local traffic flows on the roads which will be used to facilitate this proposal. There are schools at primary level at Ballyfacey, Glenmore, Bigwood and Mullinavat and Slieverue which generate traffic on them. Likewise, there are secondary schools at Ballyhale, New Ross and Waterford. As the area is a strong agricultural heartland there will be significant movements on it by agricultural machinery and equipment. The R704 is a main artery from South Kilkenny to New Ross.
- 11 The imposition of 10 turbines on the scale proposed represents an intrusion into the landscape and there will never be a possibility of obscuring them from view.
- 12 The proposal seeks to take away a huge element of the residential amenity of the area. A community benefit fund recognises it but does not compensate those who are the loss. In fact, such a loss cannot be quantified.
- 13 People in the area have accommodated 13 wind turbines of lesser heights into their area over the past 20 years. They look northwards and see another proposal for 21 wind turbines at Castlebanny under Judicial Review and another for 5 turbines, at Castlegarden, at a pre-planning stage. The siting of so many and on such a scale in a relatively small area is too intense.
- 13 The view along the M9 southwards from the interchange at Knocktopher will be of a continuum of wind turbines.
- 14 The landscape of South Kilkenny will be completely altered by this proposal.
- 15 Tory Hill, Three Friars and St. Moling's Well are sites which everyone in South Kilkenny seeks to care for and protect. There are views into Wexford, Waterford, Tipperary which are worthy of protection from intrusion.