MKO Planning and Environmental Consultants

Planning Report

Killoshulan Wind Farm



DOCUMENT DETAILS

Client:	**Killoshulan Renewable Energy Limited**
Project Title:	**Killoshulan Wind Farm**
Project Number:	**260172**
Document Title:	**Planning Report**
Document File Name:	**260172 Killoshulan Planning Report – 2026.10.30 F**
Prepared By:	**MKO** **Tuam Road** **Galway** **Ireland** **H91 VW84**

Planning and Environmental Consultants

Rev	Status	Date	Author(s)	Approved By
01	Draft	24/08/2026	IG, MM	FR
02	Draft	01/10/2026	IG, MM	FR
03	Final	30/10/2026	IG, MM	FR

Table of Contents

1. EXECUTIVE SUMMARY 1
2. INTRODUCTION 3
2.1 Report Definitions 3
2.2 Report Content and Structure 4
3. PROPOSED DEVELOPMENT BACKGROUND 6
3.1 The Applicant 6
3.2 Site Location and Context 6
3.3 Planning History 6
4. CONSULTATION 24
4.1 EIAR Scoping 24
4.2 Pre-Application Meetings 24
4.3 Community Consultation 28
5. PROPOSED DEVELOPMENT 30
5.1 Proposed Development Description 30
5.2 Proposed Project Design Process 33
6. LEGISLATIVE CONTEXT 42
6.1 Planning and Development Act 2000 (as amended) 42
6.2 Climate and Renewable Energy Legislation 44
7. PLANNING POLICY CONTEXT 46
7.1 International, European, National and Regional Policy 46
7.2 Local Policy Context 54
8. WIND ENERGY CAPACITY ASSESSMENT 78
8.1 Constraint Buffer Rationale 78
8.2 Step 1: County Kilkenny 81
8.3 Step 2: Wind Energy Strategy Areas 82
8.4 Step 3: Housing Constraint 83
8.5 Step 4: Transport Corridors and Grid Constraints 84
8.6 Step 5: Watercourses and Waterbodies 85
8.7 Step 6: Designated Sites 86
8.8 Step 7: Existing and Permitted Wind Farms 87
8.9 Step 8: Small Areas Filter 88
8.10 Actual Viable Area 89
8.11 Area Remaining for New Wind Energy Development 90
8.12 Wind Energy Capacity Assessment and Wind Energy Targets 91
9. PLANNING ASSESSMENT 93
9.1 Strategic Need for the Proposed Project 93
9.2 Compliance with Planning Policy 94
9.3 Compliance with Legislation 95
9.4 EIAR Findings 95
9.5 NIS Findings 96
9.6 Principle of Development 96
10. CONCLUSION 98

TABLE OF TABLES

Table 3-1 Planning Applications within the Proposed Development Site 1
Table 3-2 Wind Energy Developments within 25km of the Proposed Turbines 5
Table 4-1: Kilkenny County Council Pre-Application Consultation Summary 24
Table 4-2: An Coimisiún Pleanála Pre-application Consultation Summary 26
Table 7-1 International, European, National and Regional Policy Objective and Compliance Summary Table 51
Table 7-2 KCCDP (as varied) Local Policy Objective and Compliance Summary Table 58
Table 7-3 KCCDP (as varied) Wind Energy Development Management Guidance 61
Table 7-4 Grid Connection Development Management Guidance 68
Table 7-5 Kilkenny WEDS Wind Energy Strategy Areas 71
Table 8-1 Constraints and Rationale 79
Table 8-2 KCCDP (as varied) Wind Energy Strategy Areas compared to MKO wind energy capacity assessment findings 91
Table 8-3 Capacity of favourable KCCDP (as varied) Wind Energy Strategy Areas as of MKO wind energy capacity assessment 91

TABLE OF FIGURES

Figure 3-1 Site Location Context 21
Figure 3-2 EIAR Site Boundary 22
Figure 3-3 Planning Application Boundary 23
Figure 5-1 Proposed Project Layout 32
Figure 5-2 Constraints and Facilitators Map 38
Figure 7-1 KCCDP (as varied) Wind Strategy Areas showing Proposed Wind Farm location 74
Figure 7-2 Extract of Figure 10.2 Wind Energy Development Strategy from the KCCDP 2014-2020 77
Figure 8-1 Illustrative example of the application of the small area filter 79
Figure 8-2 County Kilkenny 81
Figure 8-3 KCCDP (as varied) Wind Energy Strategy Areas 82
Figure 8-4 700m buffer from residential dwellings (700m based on a 4 x 175m turbine tip height) 83
Figure 8-5 Remaining viable area after housing buffer is applied 83
Figure 8-6 Buffer from transport and grid constraints 84
Figure 8-7 Remaining viable area after transport and grid corridor buffer is applied 84
Figure 8-8 Buffer from watercourses and waterbodies 85
Figure 8-9 Remaining viable area after water constraints are applied 85
Figure 8-10 100m buffer from designated sites 86
Figure 8-11 Remaining viable area after designated sites buffer is applied 86
Figure 8-12 Existing and permitted wind farms in County Kilkenny 87
Figure 8-13 Remaining viable area after existing and permitted wind farms are removed 87
Figure 8-14 Remaining viable area after sites less the 0.5km² are removed 88
Figure 8-15 KCCDP (as varied) Wind Strategy Areas 89
Figure 8-16 Actual remaining viable area 89

Figure 8-17 Remaining viable area with favourable and unfavourable KCCDP (as varied) Wind Energy Strategy Areas 90

Figure 8-18 Wind Farm Project Attrition 92

1. EXECUTIVE SUMMARY

The Proposed Killoshulan Wind Farm ('the Proposed Project') consists of 10 no. wind turbines, a battery energy storage system facility, and associated infrastructure and works ('the Proposed Wind Farm') and a 110kV onsite electrical substation, grid connection, and associated infrastructure and works ('the Proposed Grid Connection') in Co. Kilkenny.

The Proposed Development for the Proposed Wind Farm and the majority part of the Proposed Grid Connection will be the subject of a Strategic Infrastructure Development planning application for approval to An Coimisiún Pleanála under the provisions of Section 37E of the Planning and Development Act 2000, as amended and is the subject of this Planning Report. The proposed development for the remaining part of the Proposed Grid Connection will be the subject of a separate planning application and will be the subject of a separate planning report.

The Proposed Wind Farm will have an installed capacity of approximately 62 Megawatts. The Proposed Grid Connection will connect the Proposed Wind Farm to the national electricity grid via a proposed 110kV onsite electrical substation and grid connection connecting to the existing Ballyragget 110kV electrical substation in the townland of Moatpark Co. Kilkenny, located approximately 12.6km east of the Proposed Wind Farm site boundary. The 10 no. wind turbines will have a blade tip height of 185 metres; a rotor diameter of 163 metres; and hub height of 103.5 metres. The site area of the Proposed Development, delineated by the red line Strategic Infrastructure Development planning application boundary, is 543.63 hectares.

This Planning Report has been prepared in support of the Strategic Infrastructure Development planning application for the Proposed Development which is accompanied by an Environmental Impact Assessment Report and Natura Impact Statement. The terminology for the Proposed Project is defined in Section 2.1 of this Planning Report.

The introductory sections of this Planning Report provide an overview of the Proposed Development, the Applicant, the site location and context, the site's planning history and a summary of the consultation undertaken. The design process is outlined, demonstrating the rationale for the site's selection and its suitability for wind energy development. The iterative design process outlines the design stages from the initial design to the final design iteration. Each design iteration responded to the specific constraints on the site, as they were identified by site surveys and detailed analysis.

The Proposed Development is strongly supported by European and national policy and legislation on renewable energy. At a European level, the Proposed Project is supported by the European Union Renewable Energy Directive and REPowerEU. At a national level, the Proposed Project is supported by the National Planning Framework First Revision, Climate Action Plan 2025, the National Energy Security Framework, among other national climate and renewable energy policies. The legally binding greenhouse gas emission reduction target and the obligations of public bodies under the Climate Action and Low Carbon Development Act 2015, as amended, should also be considered in the assessment of this application. At a local level, the Proposed Development is supported by climate and renewable energy policies as set out in the Kilkenny City and County Development Plan 2021-2027. A full appraisal of the relevant legislation and policy is provided in Section 6 and Section 7 of this Planning Report.

The development of viable sites for wind energy development is essential to meet European, national, regional and local climate and renewable energy targets. Ireland needs to scale up onshore wind energy development at an unprecedented rate to achieve its 9GW and 80% renewable energy share targets, as set out in the Climate Action Plan 2025. The reality of achieving these targets is the installation of over 800 Megawatts of wind energy per year until 2030.

A major step up in renewable energy deployment levels is now required for Ireland to reach its renewable energy target and its carbon budgets. The latest climate and energy reports all make one message abundantly clear; Ireland is not acting fast enough. The Environmental Protection Agency report Ireland's Greenhouse Gas Emissions Projections 2025-2030 (May 2026) highlights that Ireland is not on track to meet its national target of 51% emissions reduction target by 2030, compared to 2018 as required under the Climate Action and Low Carbon Development Act 2015, as amended, nor is the country projected to meet its European Union target of 42% emissions reduction, compared to 2005 under the

Effort Sharing Regulations. Similarly, the Climate Change Advisory Council make clear in its Annual Review – Electricity (May 2026) that '*2025 saw Ireland fail to achieve multiple key CAP* [Climate Action Plan] *targets including capacity for both onshore wind and solar*'. Without decisive action to facilitate renewable energy deployment, Ireland risks missing national and European Union commitments, incurring financial penalties, and undermining energy security.

If permitted, the Proposed Development will generate and provide approximately 62 Megawatts of clean and sustainable renewable wind energy to Ireland's national electricity grid and national renewable energy capacity. This will not only contribute to the decarbonisation of the electricity sector but will play a role in the decarbonisation of other sectors and the transition to a sustainable and climate-resilient economy and society.

To conclude, it is submitted that, based on the evidence provided in this Planning Report, the Proposed Development is strongly supported by European, national, regional and local planning policy and will contribute to the achievement of national and local climate and renewable energy targets. The Proposed Development will also support Ireland's energy security by generating and increasing indigenous renewable wind energy, which will reduce Ireland's reliance on imported fossil fuels for energy generation. Ultimately, it is submitted that the Proposed Development is in accordance with principles of proper planning and sustainable development.

2. INTRODUCTION

This Planning Report has been prepared by MKO on behalf of Killoshulan Renewable Energy Limited ('the Applicant'), to accompany a Strategic Infrastructure Development ('SID') planning application to An Coimisiún Pleanála ('ACP' or 'the Commission') under Section 37E of the Planning and Development Act 2000, as amended ('the Planning Act'). The Proposed Killoshulan Wind Farm ('the Proposed Project') comprises 10 no. wind turbines, a battery energy storage system ('BESS') facility, and associated infrastructure and works ('the Proposed Wind Farm') and a 110kV onsite substation, grid connection, and associated infrastructure and works ('the Proposed Grid Connection') in Co. Kilkenny. The site area of the Proposed Development, as delineated by the red line SID planning application boundary ('the Proposed Development Site') as shown in Figure 3-3, is 543.63 hectares ('ha'). The Proposed Development Site is located in the townlands of Barna, Killoshulan, Spahill, Frankford or Ballykieran, Foyle South, Clomantagh (Mt. Garret), Urlingford, Mountfinn, Balief Lower, Balief Upper, Coolcashin, Garrydague, Ballygowney, Ballyring Upper, Lisdowney, Seskin Little, Seskin North, Seskin South and Ballyconra, Co. Kilkenny. A site location context map is shown in Figure 3-1.

The Proposed Development which is the subject of the SID planning application to the Commission under Section 37E of the Planning Act and this Planning Report comprises the Proposed Wind Farm and the majority part of the Proposed Grid Connection (including the a 110kV onsite electrical substation, approximately 12km of underground electrical and communications cabling from the proposed 110kV onsite electrical substation to the western boundary of the River Nore to facilitate a future connection to the national grid via the existing Ballyragget 110kV electrical substation, and associated infrastructure and works).

The proposed development for the remaining part of the Proposed Grid Connection (including approximately 0.6km of underground electrical and communications cabling from the western boundary of the River Nore to the existing Ballyragget 110kV electrical substation to facilitate the connection of the Proposed Development to the national grid, and associated infrastructure and works) will be the subject of a separate planning application and will be the subject of a separate planning report.

The Proposed Development falls within the definition of a 'renewable energy development' and is therefore covered by the provisions of the Renewable Energy Directive III (Directive 2023/2413). The SID planning application is subject to a completeness check under section 37JA of the Planning Act, as amended by the European Union (Planning and Development) (Renewable Energy) Regulations 2025.

The SID planning application for the Proposed Development is accompanied by an Environmental Impact Assessment Report ('EIAR'), an Appropriate Assessment ('AA') Screening Report, and a Natura Impact Statement ('NIS').

2.1 Report Definitions

For the purposes of this Planning Report and as set out in Chapter 1 of the EIAR, the Proposed Project will be referenced as follows:

- Where the **'Proposed Project'** is referred to this encompasses the entirety of the project for the purposes of the Environmental Impact Assessment ('EIA') in accordance with the EIA Directive. The Proposed Project is described in detail in Chapter 4 of the EIAR.
- Where the **'Proposed Wind Farm'** is referred to, this refers to turbines (Proposed Turbines) and associated foundations and hardstanding areas, including entrances and access roads, underground cabling, permanent meteorological mast, temporary construction compounds, turbine delivery accommodation works, spoil management areas, borrow pit, tree felling, site drainage, operational stage signage, BESS, biodiversity enhancement areas and all ancillary works and apparatus. The Proposed Wind Farm is described in detail in Chapter 4 of the EIAR.
- Where the **'Proposed Grid Connection'** is referred to, this refers to the on-site 110kV Substation, all ancillary works and underground 110kV grid connection cabling connecting to the existing Ballyragget 110kV Substation, Co. Kilkenny, and all ancillary works and apparatus. The Proposed Grid Connection is described in detail in Chapter 4 of the EIAR.

- The **'Proposed 110kV Substation'** refers to the new proposed onsite electricity infrastructure proposed within Frankford or Ballykeiran townland, Co. Kilkenny comprising 2 no. control buildings and the electrical substation components necessary to consolidate the electrical energy generated by each wind turbine and export that electricity from the onsite 110kV substation to the national grid.

- The **'Proposed 110kV Underground Cabling'** refers to new proposed 110kV underground electrical cabling connection from the 'Proposed 110kV Substation' to the existing 110kV Ballyragget substation, in the townland of Moatpark, approximately 1km north of Ballyragget, Co. Kilkenny. The underground electrical cabling route measures approximately 12.6km in length, the majority of which is located within the curtilage of the public road network.

- Where the **'Site'** is referred to, this relates to the primary study area for the EIAR, as delineated by the EIAR Site Boundary in green as shown on Figure 3-2 below and encompasses an area of approximately 796 ha. Where the 'Proposed Wind Farm site' is referred to, this relates the EIAR Site Boundary without the corridor that encompasses the Proposed 110kV Underground Cabling route.
- Where the **'Proposed Development'** is referred to, this refers to the Proposed Wind Farm as described above and the Proposed Grid Connection as described above (excluding approximately 0.6km of underground electrical and communications cabling from the western boundary of the River Nore to the existing Ballyragget 110kV electrical substation to facilitate the connection of the Proposed Development to the national grid, and associated infrastructure and works, which will be the subject of a separate planning application and will be the subject of a separate planning report). The Proposed Development the subject of the SID planning application to the Commission under Section 37E of the Planning Act and this Planning Report. The Proposed Development is described in detail in Section 5.1 of this Report.
- Where the **'Proposed Development Site'** is referred to, this relates to the site area of the Proposed Development, as delineated by the red line SID planning application boundary, as shown in Figure 3-3 of this Report and encompasses area of 543.63 ha.

2.2 Report Content and Structure

This Planning Report provides a comprehensive evaluation and robust justification for the Proposed Development against relevant policy and legislation at the European, national, regional and local levels.

The Proposed Development is strongly supported by European and national policy and legislation on renewable energy as demonstrated in Section 6 and Section 7 of this Planning Report. The development of renewable energy generation projects, such as the Proposed Development, is essential to meet European, national, regional and local climate and renewable energy targets. Critically, Section 7 demonstrates that there is a clear and urgent need for additional renewable energy generation projects to be developed across the State to meet Ireland's legally binding greenhouse gas emission reduction targets as set out under the Climate Action and Low Carbon Development Act 2015, as amended ('the Climate Act').

Section 7 of this Planning Report demonstrates that the Proposed Development is strongly supported in principle by the climate and renewable energy policies set out in the Kilkenny City and County Development Plan 2021-2027 ('KCCDP') including the policies and objectives of the Kilkenny Wind Energy Development Strategy 2021 ('Kilkenny WEDS') of the KCCDP. Kilkenny County Council ('KCC') have made 10 no. Variations to the KCCDP. However, it should be noted that the Variations do not relate to the climate and renewable energy policies or objectives within the KCCDP (as varied).

Section 7 presents a comprehensive local planning policy compliance assessment which demonstrates that the Proposed Development is in accordance with all other relevant policies and objectives of the KCCDP (as varied) including development management guidance (refer to Table 7-2, Table 7-3, and Table 7-4).

Section 5.2 of this Planning Report provides a clear rationale for the selection of the Proposed Development Site demonstrating that it represents a suitable site for wind energy development.

This Planning Report is structured as follows:

- **Introduction:** Introduction to the Proposed Development and an outline of the Planning Report definitions, structure and contents.
- **Proposed Development Background:** Outlines the Applicant for the Proposed Development, the site location and context, and the planning history.
- **Consultation:** Presents EIAR scoping, pre-application and community consultations details.
- **Proposed Development:** Description of the main elements of the Proposed Development subject to the Section 37E SID planning application to the Commission along with the design process for the Proposed Project from site selection through to the final design.
- **Legislative Context:** Requirements under the Planning Act, along with an overview of the legislative framework for renewable energy and climate action.
- **Planning Policy Context:** Review and evaluation of the Proposed Development against international, European, national, regional, and local policy.
- **Wind Energy Capacity Assessment:** Outlines the results of the County-wide constraints analysis which identifies the County's potential to meet the wind energy targets as previously stated in the KCDP (as varied) and Kilkenny WEDS.
- **Planning Assessment:** Provides an evaluation of the Proposed Development against the relevant legislative and policy requirements.
- **Conclusion:** Presents the overall conclusions of this report.

3. PROPOSED DEVELOPMENT BACKGROUND

3.1 The Applicant

The Applicant for the Proposed Development, Killoshulan Renewable Energy Limited, is a subsidiary of Atlantic Infrastructure Renewables Limited (AIR), which is an Irish-owned, Limerick-based company.

AIR invests in infrastructure projects across Ireland. Their projects help deliver high-quality infrastructure assets that are essential to society and the communities where they are located. AIR helps bridge funding, capacity, and delivery gaps and provides critical infrastructure ahead of when others might have been able to so.

3.2 Site Location and Context

The Proposed Development Site, as delineated by the red line SID planning application boundary as shown in Figure 3-3, encompasses an area of 543.63 ha and is located in the townlands of Barna, Killoshulan, Spahill, Frankford or Ballykieran, Foyle South, Clomantagh (Mt. Garret), Urlingford, Mountfinn, Balief Lower, Balief Upper, Coolcashin, Garrydague, Ballygowney, Ballyring Upper, Lisdowney, Seskin Little, Seskin North, Seskin South and Ballyconra, Co. Kilkenny. The site location context map is shown in Figure 3-1 below.

The Proposed Wind Farm is located approximately 4km west of the village of Freshford, 3.7km northeast of the village of Urlingford, Co. Kilkenny and approximately 15km northwest of Kilkenny City. Co. Kilkenny. The R693 runs along the southern boundary of the Proposed Wind Farm site in the townland of Barna, Co. Kilkenny. The Proposed Wind Farm is served by a number of existing public, forestry and agricultural roads and tracks.

The Proposed Grid Connection includes a Proposed 110kV Underground Cabling from the Proposed 110kV Substation, in the townland of Frankford or Ballykieran, Co. Kilkenny to the existing Ballyragget 110kV Substation in the townland of Moatpark, Co. Kilkenny. The Proposed Grid Connection to Moatpark, Co. Kilkenny measures approximately 12.6km in length and is primarily located within the public road corridor. Approximately 772m is proposed within National Roads (N77), 9.6km proposed within Local Roads, 653m proposed within the Proposed Wind Farm internal road network and approximately 1.5km proposed within agricultural lands in Frankford or Ballykieran, and Moatpark, Co. Kilkenny.

Accommodation works will be required at various locations on the national, regional and local road network between the port of entry and the Proposed Wind Farm site. These will be limited to temporary measures including temporary local road widening, temporary access road through agricultural land, overruns of roundabout islands and temporary relocation of some signs and street furniture.

Current land-use on the Proposed Wind Farm site comprises commercial forestry, agricultural pastural land, mixed forest and transitional woodland-shrub. Current land-use along the Proposed Grid Connection comprises of public road corridor, public open space, agriculture, commercial forestry, land principally used by agriculture with significant areas of natural vegetation, mineral extraction sites, mixed forest and discontinuous urban fabric. Land-use in the wider landscape of the site comprises a mix of agriculture, quarrying, renewable energy, low density residential and commercial forestry. Land-use in the areas proposed for turbine delivery route accommodation comprises a mix of agriculture, transitional woodland-shrub, and coniferous forest and public open space.

A Site Location Context map, an EIAR Site Boundary map and a Planning Application Boundary Map are shown in **Figure 3-1, Figure 3-2 and Figure 3-3 respectively,** below.

3.3 Planning History

3.3.1 Planning Applications within the Proposed Development Site

A planning search was carried out through KCC's and the Commission's online planning portals in October 2026 for relevant planning applications submitted within the past 10 years, that fall within the planning application red line boundary of the Proposed Development. The relevant planning applications are outlined in Table 3-1 below.

3.3.2 Wind Energy Developments within 25km of the Proposed Turbines

A planning search was carried out to establish proposed, permitted and operational wind energy developments within 25km of the Proposed Turbines. This distance was chosen as it is considered that cumulative impacts would not exist with any development proposed, permitted or operational, greater than 25km from the proposed turbines. Section 2.9 in Chapter 2 of the EIAR details the methodology adopted for the cumulative assessment undertaken within the EIAR.

The search was carried out using the relevant Local Authority and Commission databases in October 2026 for relevant planning applications. In total, 24 no. wind energy developments were identified within 25km of the Proposed Turbines of the Proposed Development, 22 no. of which relate to proposed, permitted or existing multiple turbine wind farm developments and a further 2 no. of which relate to proposed, permitted or existing single turbine developments. These are outlined in greater detail in Table 2-3 of Chapter 2 of the EIAR and are summarised in Table 3-2 below.

Table 3-1 Planning Applications within the Proposed Development Site

Planning Authority	Pl. Ref.	Description	Planning Authority Decision
Kilkenny County Council	1773	For Milk Powder Processing Building including alterations to adjacent existing buildings, partial demolition and extension to the existing Boiler House; demolition of an existing penthouse and its replacement with a similar but higher bag off penthouse; alterations and extension to the Amenity Building, and all associated works.	Granted by Kilkenny County Council on 05/04/2017
Kilkenny County Council	18187	To construct (i) milking parlour with collecting yard and handling/crush yard (ii) slatted tank (iii) over ground slurry tower (iv) cubicle area (v) meal bin and all associated site works.	Granted by Kilkenny County Council on 29/05/2018
Kilkenny County Council	21627	For a ten-year appropriate period planning permission: The installation of 31.49km of a 38kV underground electrical cabling and all other ancillary works including joint bays, culverts, maker posts and all associated development. Advisory Note: The full extent of the grid connection is 33.8km, and a separate planning application will be made for an underground grid connection to Tipperary County Council. The development comprises part of an overall development for which planning permission was granted for a 9 turbine wind farm and all associated works on lands located in the townlands of Farranroy Upper, Farranroy Lower, Coolnashinnagh & Gortnasmuttaun, Co. Tipperary. The planning application will be accompanied by an Environmental Impact Assessment Report (EIAR) and Natura Impact Statement.	Granted by Kilkenny County Council on 24/08/2022
Kilkenny County Council	21882	For the installation of 2 new cooling tower units and associated concrete bases at the existing Waste Water Treatment Plant and associated ancillary site works. Upgrade works to the existing watermain and all ancillary site works. A Natura Impact Statement has been prepared and accompanies this application.	Granted by Kilkenny County Council on 10/03/2022
Kilkenny County Council	22687	Construction of two anaerobic digesters, one equalization tank to include concrete base, earth embankment and associated works; construction of biogas storage dome with biogas flare, desulfurization unit; construction of membrane and control building with yard slab and link road; construction of ferric chloride storage tank; installation of a new pipeline with underground and overground sections for the purpose of conveying renewable biogas to the Glanbia facility east of the N77 road; realignment of the existing internal road to facilitate vehicle movements; drainage works and all associated site works including landscaping. The dismantling and removal of an existing disused sludge mixing tank; dismantling and removal of an existing biotower. This facility holds an industrial emissions licence issued by the Environmental Protection Agency. A Natura Impact Statement (NIS) will accompany this application.	Granted by Kilkenny County Council on 27/02/2023
Kilkenny County Council	2360147	To construct (i) Slatted tank (ii) Calf shed and all associated site works.	Granted by Kilkenny County Council on 19/07/2023
Kilkenny County Council	2360248	For an amendment to planning application previously granted under reference PL/21/627.	Granted by Kilkenny County Council on 06/12/2023
Kilkenny County Council	2460265	1. New single storey extension to the side of their existing community centre consisting of 2 no. new changings rooms, shower rooms, toilets, physio room, store, entrance lobby and gym, 2. New external signage, 3. New ball wall with all-weather synthetic playing area and associated perimeter fencing, 4. New wastewater treatment system and percolation area, 5. New public lighting to walking track, 6. All associated site developments works.	Granted by Kilkenny County Council on 11/11/2024
Kilkenny County Council	2560003	For a period of 10 years for a development;	Refused by Kilkenny County Council on 27/02/2025

Planning Authority	Pl. Ref.	Description	Planning Authority Decision
		i. 7 no. wind turbines with an overall turbine tip height of 185 metres; a rotor blade diameter of 163 metres; and hub height of 103.5 metres, and associated foundations and hard-standing areas; ii. A permanent 38kV substation compound (control building with welfare facilities, all associated electrical plant and apparatus, security fencing, underground cabling, storage containers, wastewater holding tank, site drainage and all ancillary works); iii. Permanent underground electrical (38kV) and communications cabling to the existing Ballyragget 110kV substation in the townland of Moatpark (including joint bays, communication and earth sheath link chambers and all ancillary works along the route). This cabling route is primarily located within the public road corridor which includes a Protected Structure (Kilkenny RPS Ref. C886); iv. Underground electrical (33kV) and communications cabling connecting the wind turbines and meteorological mast to the on-site substation; v. 3 no. temporary construction compounds (including site offices and welfare facilities); A meteorological mast with a height of 30 metres, security fencing and associated foundation and hard standng area; vii. A new temporary site entrance on the L1009; viii. A new gated site entrance on the L5024; ix. Upgrade of existing site tracks/ roads and provision of new site access roads, junctions and hardstand areas; x. A borrow pit; xi. Spoil Management; xii. Tree felling and hedgerow removal; xiii. Biodiversity Management and Enhancement Plan measures (including establishment of a riparian buffer and hedgerow enhancement); xiv.Site Drainage; xv. Operational Stage site signage; and xvi. All ancillary works and apparatus. A thirty five-year operational life from the date of full commissioning of the wind turbines and subsequent decommissioning of the wind turbines is being sought. An Environmental Impact Assessment Report and Natura Impact Statement has been prepared in respect of the proposed development and accompany this application.	Appealed to An Coimisiún Pleanála on 27/03/2025 under ACP Case Ref. PL10.322154
An Coimisiún Pleanála	322154	For a period of 10 years for a development at the site. The development will consist of the provision of 7 no. wind turbines , and all ancillary works and apparatus. An Environmental Impact Assessment Report and Natura Impact Statement has been prepared.	Granted by An Coimisiún Pleanála on 21/08/2026
Kilkenny County Council	2560219	Demolition of an existing diesel bund, a chemical storage bund, and of an existing IBC containment area and for the reconstruction of all, at revised locations. Construction of a two-storey process building. Construction of a 6-bay intake / dispatch canopy and associated single storey services and welfare building. Construction of a refrigeration building with roof mounted mechanical equipment, a transformer enclosure, a chilled water storage tank and a hot water storage tank Construction of a CIP centre complete with associated tanks and vessels and a hot water storage tank adjacent. Construction of a new chemical storage bund and relocation of an existing permeate storage silo. Construction of a silo base and plinth for the housing and installation of 10 number silos.	Granted by Kilkenny County Council on 29/07/2025

Planning Authority	Pl. Ref.	Description	Planning Authority Decision
		Installation of a modular site cabin and a lightweight metal shed. Construction of a penthouse roof arrangement, installation of roof mounted transformers and roof mounted air handling equipment. Construction of an extension to an existing car park complete with modified access Construction of a new internal access road and for the widening and realignment of the existing internal road network. Construction, incorporating modifications to an existing external stair and retaining wall arrangement. Associated site works including earthworks, berm formation, retaining walls, pipe and service bridges, fencing and screening and drainage works including a new process effluent line with overground and below ground sections, and all associated site works including landscaping. This facility holds an industrial emissions licence issued by the Environmental Protection Agency. An Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS) will accompany this application.	
Kilkenny County Council	2560418	i. The construction of 6 no. wind turbines with an overall turbine tip height of 175 metres; a rotor blade diameter of 150 metres; and hub height of 100 metres, and associated foundations and hard standing areas; ii. A permanent 38kV substation compound (control building with welfare facilities, all associated electrical plant and apparatus, security fencing including vegetative screening, underground cabling, wastewater holding tank, site drainage and all ancillary works); iii. Permanent underground electrical (38kV) and communications cabling to the existing Ballyragget 110kV substation in the townland of Moatpark (including joint bays, communication and earth sheath link chambers and all ancillary works along the route); iv. Underground electrical and communications cabling connecting the wind turbines and meteorological mast to the on-site substation; v. A meteorological mast with a height of 100m above ground and associated foundation and hard-standing area; vi. Upgrade of existing tracks and roads and the provision of new site access roads; vii. All works associated with the upgrade of the existing agricultural access off the L58333 local road (including the installation of fencing and steel gates); viii. 2 no. temporary construction compounds (including temporary site offices and welfare facilities); ix. Accommodation works along the N77 National secondary road in the townland of Ballynaslee, Co. Kilkenny to facilitate the delivery of turbine components and other abnormal sized loads; x. A borrow pit; xi. Spoil Management; xii. Hedgerow removal; xiii. Biodiversity Management and Enhancement Plan measures (including establishment of new hedgerow, translocation of existing hedgerow and enhancement of existing hedgerow); xiv. Site Drainage; xv. Operational stage site signage; and, xvi. All associated site development works, ancillary works and apparatus. A 10-year planning permission and 35-year operational life from the date of commissioning of the entire wind farm is being sought.	Refused by Kilkenny County Council on 02/09/2025 Appealed to An Coimisiún Pleanála on 27/10/2025 under ACP Case Ref. PL10.323759

Planning Authority	Pl. Ref.	Description	Planning Authority Decision
		An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) accompany this planning application."	
An Coimisiún Pleanála	323759	The construction of 6 no. wind turbines and all associated works. An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) accompanies this application.	Ongoing case with An Coimisiún Pleanála
An Coimisiún Pleanála	308824	N77 Ballyragget Village to Ballynaslee Road Improvement Scheme.	Granted by An Coimisiún Pleanála on 26/08/2021
An Coimisiún Pleanála	316132	Two anaerobic digesters with storage dome with associated and ancillary site development works. A Natura Impact Statement (NIS) will accompany this application.	Granted by An Coimisiún Pleanála on 25/02/2025
An Coimisiún Pleanála	324680	10 year planning permission for Gathabawn Wind Farm consisting of 12 no. wind turbines and ancillary works.	To be decided by An Coimisiún Pleanála on 27/09/2027

Table 3-2 Wind Energy Developments within 25km of the Proposed Turbines

Pl. Ref	Wind Farm	County	Description	Decision	Status	No. of Turbines
Single/ Domestic Turbine Developments						
Tipperary County Council (TCC) Pl. Ref. 09/801	Gurteen Lower Single Wind Turbine	Tipperary	1 no. wind turbine, site tracks, hard standing areas, anemometry mast, small control building and compound, underground cabling, temporary site works and ancillary works.	Granted by TCC on 16/12/2010	Existing	1
KCC Pl. Ref. 26/60292	Loan Single Wind Turbine	Kilkenny	For construction of a Single Wind Turbine development on a 5.98-hectare site consisting of: - I. A single 4.26-megawatt (MW) wind turbine with an overall tip height of 150 metres, comprising a rotor diameter of 138m and a hub height 81m; II. Wind turbine foundation, crane hardstanding and assembly area; III. Temporary Construction Compound; IV. Upgrading and repositioning of existing farm entrance; V. Upgrading and widening of existing access track; VI. New access track; VII. An on-site 20kV electrical substation building; VIII. Electrical and communication cabling within private lands; IX. Underground 20kV grid connection within private lands and within the L5851 and the R426 public roads connecting to the existing ESB Castlecomer 38kV Substation; X. Hedge and tree removal, landscaping and reinstatement works; and XI. All associated ancillary works. The operational lifespan of the development will be 35-years from the date of commissioning. This Planning Application is accompanied by a Natura Impact Statement (NIS). This Planning Application is not subject to an Environmental Impact Assessment Report (EIAR). This development is covered by the provisions of the Renewable Energy Directive III (Directive (EU) 2023/2413) and it is important to note that the planning application may be subject to section 34D of the Planning and Development Act 2000, as amended. When a notice issues in accordance with section 34D(b), the provisions of article 26A of the Planning and Development Regulations 2001 to 2025 shall apply.	Application submitted to KCC on 15/05/2026 – Decision pending	Proposed	1
Large Wind Energy Developments						
TCC Pl. Ref. 09/781 ACP Case Ref. PL23.237713	An Cnoc Wind Farm	Tipperary	5 no. wind turbines, site tracks, hard standing areas, anemometry mast, small control building and compound, underground cabling, site signage, temporary site works and ancillary works; an Environmental Impact Statement has been submitted with application.	Granted by TCC on 10/09/2010 Appealed and granted by	Existing	5

Pl. Ref	Wind Farm	County	Description	Decision	Status	No. of Turbines
				ACP on 22/03/2011		
TCC Pl. Ref. 13/231 ACP Case Ref. 23.243357	Ballincurry Wind Farm	Tipperary	A single wind turbine, overall height of up to 126.5 metres, electrical control building, access road, attenuation pond and ancillary site works.	Refused by TCC on 10/04/2014 Appealed and granted by ACP on 01/10/2014	Existing	2
TCC Pl. Ref. 15/600561 ACP Case Ref. 92.245874			A single wind turbine, overall height of up to 138 metres, electrical control building, access road and ancillary site works.	Refused by TCC on 17/11/2015 Appealed and granted by ACP on 26/08/2016		
KCC Pl. Ref. 12/533	Ballybay Wind Farm	Kilkenny	For windfarm, in the townslands of Boggan and Ballybeagh, Tullaroan, Co. Kilkenny, comprising of six turbines with a hub height of 74.5m and a maximum blade tip height of 110m, together with a borrow pit, 80m permanent metrological mast and associated access roads and site works. This will replace a previous permission for a windfarm granted under Planning ref no. 02/1072 which was extended under 08/735 and subsequently under 12/194 for five turbines, four turbines with a hub height of 60m and maximum blade tip height of 93m and one turbine with a hub height 49m and maximum blade tip height of 82m, on a site at Ballybeagh, Tullaroan, Co. Kilkenny. An appropriate period of 10 years (duration of the planning permission to construct the development) is sought, with an operational life of 25 years after the date of commissioning. An Environmental Impact Statement (EIS) and Natura Impact Statement (NIS) accompany this application. Development.	Granted by KCC on 20/02/2013	Existing	6

Pl. Ref	Wind Farm	County	Description	Decision	Status	No. of Turbines
KCC Pl. Ref. 14/515			For development. The development consists of:- Modification of planning permission Reg.ref 12/533 for a six turbine wind farm, located in the townlands of Boggan and Ballybeagh, Tullaroan, Co. Kilkenny. Planning permission was granted for six turbines each with a hub height of 74.5m, blade length of 35.5m and a maximum blade tip height of 110m and all associated infrastructure under Reg. ref 12/533. The proposed modification will consist of (i) reducing each turbine hub height from 74.5m to 69m; and (ii) increase each turbine blade length from 35.5m to 41m keeping within the overall permitted maximum tip height of 110m as granted under Reg.ref 12/533. The location of the turbines and all other elements of the wind farm layout will remain unaltered as granted planning permission under Reg.ref 12/533.	Granted by KCC on 20/02/2015		
KCC Pl. Ref. 10/145	Bruckana Wind Farm	Kilkenny	For development. The development will consist of eight wind turbines of up to 100m hub height and up to 112m rotor diameter with a total height not exceeding 156m; a transformer and crane hardstand area at each turbine; under-ground electrical and communication cables linking the turbines; internal site tracks, the upgrading of existing access tracks; drainage works; a 38kV substation with associated equipment and control building with associated septic tank and treatment system; a section of the proposed 38kV overhead power line from the proposed 38kV substation in Bruckana to the 110kV Lisheen substation; a permanent meteorological lattice mast 100m high; and associated works. This development is part of a larger development which also extends to parts of County Laois (townland of Baunaghra) and North Tipperary (townlands of Killoran and Tullowmacjames). The development as a whole will consist of a wind farm comprising: 16 wind turbines of up to 100m hub height and up to 112m rotor diameter with a total height not exceeding 156m; a transformer and crane hardstanding area at each turbine; underground electrical and communication cables linking the turbines; internal site tracks; a permanent meteorological lattice mast 100m high; drainage works; a 38kV substation and associated equipment and control building with associated septic tank and treatment system; a 38kV overhead line to the 110kV Lisheen substation; and associated works. An Environmental Impact Assessment accompanies the application. The development is proposed on a site that is the subject of an Integrated Pollution Control Licence (Reg. No. 499) as issued by the EPA in accordance with the provisions of the Environmental Protection Agency Act, 1992.	Granted by KCC on 24/11/2010	Existing	14

Pl. Ref	Wind Farm	County	Description	Decision	Status	No. of Turbines
Laois County Council (LCC) Pl. Ref. 10/129		Laois	Erect 4 wind turbines of up to 100m hub height and up to 112m rotor diameter with a total height not exceeding 156m; a transformer and crane hardstand area at each turbine; underground electrical and communications cables linking the turbines; internal site tracks; drainage works and associated works. This development is part of a larger development which also extends to parts of Co. Kilkenny and North Tipperary. The development as a whole will consist of a wind farm comprising; sixteen wind turbines of up to 100m hub height and up to 112m rotor diameter with a total height not exceeding 156m; a transformer and crane hardstanding area at each turbine; underground electrical and communication cables linking the turbines; internal site tracks; a permanent meteorological lattice mast 100m high; drainage works; a 38kV substation and associated equipment and control building with associated septic tank and treatment system; a 38kV overhead line to the 110kV Lisheen substation and associated works. An Environmental Impact Assessment accompanies the application. The development is proposed on a site that is the subject of an integrated Pollution Control Licence (Reg. No. 499) as issued by the EPA in accordance with the provisions of the Environmental Protection Agency act, 1992.	Granted by LCC on 26/01/2011		
TCC Pl. Ref. 10/510118		Tipperary	Four wind turbines of up to 100m hub height and up to 112m rotor diameter with a total height not exceeding 156m; a transformer and crane hardstand area at each turbine; underground electrical and communication cables linking the turbines; internal site tracks; drainage works; a section of the proposed 38kV overhead power line from the proposed 38kV substation in Bruckana to the 110kV Lisheen substation; and associated works. This development is part of a larger development which extends to parts of County Laois (townland of Baunaghra) and County Kilkenny (townlands of Bruckana, Rathpatrick and Baunmore). The development as a whole will consist of a wind farm comprising: sixteen wind turbines of up to 100m hub height and up to 112m rotor diameter with a total height not exceeding 156m; a transformer and crane hardstanding area at each turbine; underground electrical and communication cables linking the turbines; internal site tracks; a permanent meteorological lattice mast 100m high; drainage works; a 38 kV substation and associated equipment and control building with associated septic tank and treatment system; a 38 kV overhead line to the 110 kV Lisheen substation; and associated works. An Environmental Impact Assessment accompanies the application. The development is proposed on a site that is the subject of an integrated Pollution Control Licence (Reg. No. 499) as issued by	Granted by TCC on 11/02/2011		

Pl. Ref	Wind Farm	County	Description	Decision	Status	No. of Turbines
			the EPA in accordance with the provisions of the Environmental Protection Agency Act, 1992.			
KCC Pl. Ref. 08/1511	Lisdowney Wind Farm	Kilkenny	For development which will consist of 4 wind turbines with service roadways, electrical control and transformer compound and anemometer. The application is accompanied by an Environmental Impact Statement.	Granted by KCC on 28/01/2010	Existing	4
KCC Pl. Ref. 12/172			For a modification for the redesign of a previously approved development at site address Lisdowney, Ballyragget, Co. Kilkenny planning reference no 08/1511. The previously approved development consisted of a wind farm with 4 turbines, a meteorological mast, electrical control transformer building, burrow pit and associated site roads. The proposed revision is to optimise the layout of the 4 turbines and associated road infrastructure and associated ancillary works and increase the hub height from 64m up to a hub height of 80m and increase the maximum blade tip height from 99.5m to 121.5m. Permission is being sought for a 10 year period. An environmental impact statement (EIS) and natura impact statement (NIS) accompany this application.	Granted by KCC on 23/07/2012		
TCC Pl. Ref. 06/510773 ACP Case Ref. PL22.222142	Lisheen Wind Farm I	Tipperary	Wind turbine farm consisting of 22 No. wind turbine generators, access roads, craneage pads and associated infrastructure. An Environmental Impact Statement will be submitted to the Planning Authority with this Application.	Granted by TCC on 31/01/2007 Appealed and Granted by ACP on 14/08/2007	Existing	18
TCC Pl. Ref. 09/510100	Lisheen Wind Farm II	Tipperary	12 no wind turbines (hub height 95m, blade diameter 90m), with an overall height from ground to blade tip of 140m, the use of 3 no. new borrow pits, construction of internal site tracks, upgrade of existng access track and associated works as an extension to Lisheen Wind Farm (Pl Ref no 06/51/0773, ABP Ref PL22.222142). An EIS has been submitted with this application.	Granted by TCC on 30/09/2009	Existing	12
KCC Pl. Ref. 14/202	Lisheen Wind Farm III	Kilkenny	For development. The development will consist of 6 no. wind turbines, to a maximum tip height of 156m; Associated hardstandings at each turbine location; Underground electrical and communication cables, linking the turbines to the substation and control building at the existing 110kV Lisheen Sub-Station, Co. Tipperary; Upgrade of approximately 380m of existing access tracks; Construction of approximately 4.5km of	Granted by KCC on 09/03/2015	Existing	8

Pl. Ref	Wind Farm	County	Description	Decision	Status	No. of Turbines
			new internal site access tracks; Construction of new drainage system and watercourse crossings; 2 no. borrow pits; associated felling of forestry and replanting; and Related site works and ancillary development. A ten-year permission is sought. The application is accompanied by an Environmental Impact Statement and Natura Impact Statement. The development is part of a larger development and the site also extends into the townlands of Graigueadrisly, Co.Laois and Killoran near Templetuohy, Co. Tipperary. SWS Energy Limited also intends to apply to Laois County Council for planning permission for development at Graigueadrisly, Co. Laois. The development will consist of two wind turbines to a maximum tip height of 156m; Associated hardstandings at each turbine location; Underground electrical and communication cables, linking the turbines to the substation and control building at the existing 110kV Lisheen Sub-Station, Co.Tipperary; Construction of approximately 1.2km of new internal site access tracks; Construction of new drainage system and watercourse crossings; associated felling of forestry and replanting; and Related site works and ancillary development. A ten-year permission is sought. The application is accompanied by an Environmental Impact Statement and Natura Impact statement. SWS Energy Limited also intends to apply to North Tipperary County Council for planning permission for development at Killoran near Templetuohy, Co. Tipperary. The development will consist of underground electrical and communication cables, linking the turbines to the substation and control building at the existing 110kV Lisheen Sub-Station, Co. Tipperary; and Construction of approximately 1.3km of new internal site access tracks. A ten-year permission is sought. The application is accompanied by an Environmental Impact Statement and Natura Impact Statement.			
KCC Pl. Ref. 19/787			The development will consist of alterations to a previously permitted wind farm development (Planning Register References 14/202 & 15/629 (Kilkenny), 14/109 (Laois) and 14/510138 & 15/600924 (Tipperary)) where the permitted development also extends into the townland of Graigueadrisly, County Laois and Killoran near Templetuohy, County Tipperary. The proposed alterations will consist of: increasing the turbine rotor diameter of the six permitted turbines from a maximum of 113m to a maximum of 136m, while maintaining the overall tip height of up to 156m per the permitted development. A ten-year permission is sought. The application is accompanied by a Natura Impact Statemet, Planning Report and Environmental Considerations Report. Lisheen III Wind Farm Limited also intends to apply to Laois County Council for planning permission for development at Graigueadrisly, County	Granted by KCC on 24/01/2020		

Pl. Ref	Wind Farm	County	Description	Decision	Status	No. of Turbines
			Laois. The proposed alterations will consist of increasing the turbine rotor diameter of two permitted turbines from a maximum of 113m to a maximum of 136m, while maintaining the overall tip height of up to 156m per the permitted development.			
KCC Pl. Ref. 20/459			The development will consist of alterations to a previously permitted wind farm development (Planning Register References 14/202, 15/629 & 19/787 (Kilkenny), 14/139 & 19/597 (Laois) and 14/510138 & 15/600924 (Tipperary) where the permitted development also extends into the townlands of Graigueadrisly, County Laois and Killoran near Templetuohy, County Tipperary. The proposed alteratons will consist of: increasing the tip height of the six permitted turbines from a maximum of 156m to a maximum of 169m and extending the operational lifetime of the wind farm, from the date of commissioning, from 25 years to 30 years. A ten-year permission is sought. The application is accompanied by a Natura Impact Statement, Planning Report and Environmental Considerations Report. Lisheen III Wind Farm Limited also intends to apply to Laois County Council for planning permission for development at Graigueadrisly, County Laois. The proposed alterations will consist of: increasing the tip height of two permitted turbines from a maximum of 156m to a maximum of 169m and extending the operational lifetime of the wind farm, from the date of commissioning, from 25 years to 30 years.	Granted by KCC on 12/01/2021		
LCC Pl. Ref. 14/139		Laois	The development will consist of two wind turbines to a maximum tip height of 156m; Associated hardstandings at each turbine location; Underground electrical and communication cables, linking the turbines to the substation and control building at the existing 110kV Lisheen Sub-station; Co. Tipperary Construction of approximately 1.2km of new internal site access tracks; Construction of new drainage system and watercourse crossings; associated felling of forestry and replanting; and Related site works and ancillary development . A ten-year permission is sought. The application is accompanied by an Environmental Impact Statement and Natura Impact Statement.	Granted by LCC on 09/04/2015		
LCC Pl. Ref. 19/597			Alter previously permitted wind farm development (Planning Register References 14/139 (Laois), 14/202 & 15/629 (Kilkenny) and 14/510138 & 15/600924 (Tipperary)) where the permitted development also extends into the townlands of Bruckana, Baunmore and Rathpatrick, County Kilkenny and Killoran near Templetuohy, County Tipperary. The proposed alterations will consist of: increasing the turbine rotor diameter of the two permitted turbines from a maximum of 113m to a maximum of 136m, while maintaining the overall tip height of up to 156m per the permitted development. A ten-year permission is sought. The application is accompanied by a	Granted by LCC on 01/04/2020		

Pl. Ref	Wind Farm	County	Description	Decision	Status	No. of Turbines
			Natura Impact Statement, Planning Report and Environmental Considerations Report. Lisheen III Wind Farm Limited also intends to apply to Kilkenny County Council for planning permission for development at Bruckana, Baunmore, Rathpatrick, County Kilkenny. The propped alterations will consist of: increasing the turbine rotor diameter of six permitted turbines from a maximum of 113m to a maximum of 136m, while maintaining the overall tip height of up to 156m per the permitted development.			
LCC Pl. Ref. 20/386			The development will consist of alterations to a previously permitted wind farm development (Planning Register References 14/139 & 19/597 (Laois), 14/202, 15/629 & 19/787 (Kilkenny) and 14/510138 & 15/600924 (Tipperary)) where the permitted development also extends into the townlands of Bruckana , Baunmore and Rathpatrick, County Kilkenny and Killoran near Templetuohy, County Tipperary. The proposed alterations will consist of: increasing the tip height of the two permitted turbines from a maximum of 156m to a maximum of 169m and extending the operational lifetime of the wind farm, from the date of commissioning, from 25 years to 30 years. A ten-year permission is sought. The application is accompanied by a Natura Impact Statement, Planning Report and Environmental Considerations Report. Lisheen III Wind Farm Limited also intends to apply to Kilkenny County Council for planning permission for development at Bruckana, Baunmore and Rathpatrick, County Kilkenny. The proposed alterations will consist of : increasing the tip height of six permitted turbines from a maximum of 156m to a maximum of 169m and extending the operational lifetime of the wind farm, from the date of commissioning, from 25 years to 30 years. The planning application includes a Natura Impact Statement.	Granted by LCC on 01/03/2021		
TCC Pl. Ref. 03/510957	Monaincha Wind Farm	Tipperary	Construct a windfarm to consist of (a) 10 wind turbine generators of hub height 80m; (b) a 50m anemometer mast; (c) electrical substation and switch station; (d) proprietary treatment unit and raised irrigation area; (e) access tracks and buried cable ducts; (f) associated site works. E.I.S. submitted with application.	Granted by TCC on 06/04/2004	Existing	10
TCC Pl. Ref. 09/510084			Windfarm development which has been the subject of a successful previous planning application reference 03510957. This application seeks a ten year permission for the previously permitted development and will consist of: (a) 10 no. wind turbine generators of hub height 80m; (b) Electrical substation & switch station; (c) Proprietary treatment unit & waste water holding tank; (d) Access tracks & buried cable ducts; (e) All associated site works & miscellaneous landscaping & enabling works. It should be noted that an Environmental Impact Statement is submitted with this application.	Extension of duration granted by TCC on 17/12/2009		

Pl. Ref	Wind Farm	County	Description	Decision	Status	No. of Turbines
TCC Pl. Ref. 11/510203			For a modification to Planning Ref. 09/51/0084 (Monaincha Wind Farm) and an amendment to associated Planning Conditions. The primary modification is an increase in turbine tip height from 125m to 156m. As a result of this modification there will also be minor (micrositing) changes in the location of 5 no. turbines and associated revisions to the supporting civil infrastructure design, including the provision of a borrow pit. An environmental impact statement accompanies this application.	Granted by TCC on 08/09/2011		
TCC Pl. Ref. 12/510174	Monaincha Wind Farm Extension	Tipperary	For an extension to Monaincha Wind Farm (Planning Ref 11/51/0203). The extension will comprise of 5 No. turbines with a tip height of up to 156m and associated access tracks and site works. An Environmental Impact Statement and Natura Impact Statement accompany this application.	Granted by TCC on 09/08/2012	Existing	5
KCC Pl. Ref. 12/378	Foyle Wind Farm	Kilkenny	For a windfarm comprising of four turbines with a hub height of 80m and a maximum blade tip height of 121m, together with an electrical transformer plant, control housing, borrow pit, metrological mast and associated access roads and site works. This will replace a previous permission for a windfarm granted under Planning ref no 05/1256 which was extended under 11/461 for five turbines with a hub height of 49m and a maximum blade tip height of 76m on a smaller site, Permission is being sought for a 10 year period. An Environmental Impact Statement (EIS) and Natura Impact Statement (NIS) accompany this application.	Granted by KCC on 14/11/2012	Existing	4
KCC Pl. Ref. 13/9			To amend the terms of use of a permitted development, the operational period of which is restricted to 10 years under condition 5 b of permission reference P12/378. The permitted development (12/378) comprises four wind turbines with hub height of 80m and a maximum blade tip height of 121m, together with an electrical transformer station, control housing, borrow pit, meteorological mast and associated access roads and site works at this site. The proposed development will comprise a material amendment to the terms of the use by extending the operational period of the turbines from the permitted 10 years to 25 years. An Environmental Impact Statement (EIS) and a Natura Impact Statement (NIS) will be submitted to the Planning Authority with the application.	Granted by KCC on 04/04/2013		
KCC Pl. Ref. 16/17	Foyle Wind Farm Extension	Kilkenny	In the townslands of Killeen, Foylatalure and Courtstown, Tullaroan, Co. Kilkenny, for one wind turbine with a hub height up to 80m and a maximum blade tip height up to 121m, underground cabling, together with associated access road (337m) and site works. The proposed turbine will form part of a permitted wind farm (PL. Ref. 12/378 as amended by PL13/9) on the adjacent Foylatalure and Courtstown site and will utilise/share the constructed access roads, borrow pit and permitted control building.	Granted by KCC on 11/04/2016	Permitted	3

Pl. Ref	Wind Farm	County	Description	Decision	Status	No. of Turbines
			The development also proposes a 20kV electrical connection between the permitted adjacent Foylatalure Wind Farm (PL.Ref. 12/378 as amended by PL 13/9) and permitted 38kV Sub-station at Ballybeagh Co. Kilkenny (PL.Ref.12/485). The 20kV electrical connection (c.5.275km long) will consist of: c.2.293km of overhead 20kV line mounted on single pole sets and c.2.982km of underground ducted 20kV cable in the townlands of Courtstown, Rathmacan, Kyleballyoughter, Gortnagap and Ballybeagh. An appropriate period of 10 years (i.e. duration of the planning permission to construct the development) is sought, with an operational life of 25 years after the date of commissioning. An Environmental Impact Statement and Natura Impact Statement accompany this application.			
KCC Pl. Ref. 23/81			Of Planning Permission Reference P.16/17	Extension of duration granted by KCC on 12/07/2023		
KCC Pl. Ref. 16666			For 2 No. wind turbines with a hub height up to 80m and a maximum blade tip height up to 121m, A grid control building, underground cabling, borrow pit, together with associated access roads and site works. The proposed turbines will form part of a permitted wind farm (PL. Ref.12/378 as amended by PL 13/9) on the adjacent Foylatalure and Courtstown site. An appropriate period of 10 years (i.e. duration of the planning permission to construct the development) is sought with an operational life of 25 years after the date of commissioning. An Environmental Impact Statement has been submitted with this application.	Granted by KCC on 27/03/2017		
KCC Pl. Ref. 24/33			of Planning Permission Ref P16666	Extension of duration granted by KCC on 13/05/2024		
ACP Case Ref. PA10.322069	Ballynalacken Wind Farm	Kilkenny	Proposed Development of the Ballynalacken Windfarm Project.	Granted by ACP on 15/04/2026	Permitted	12
ACP Case Ref. PA92.318704	Borrisbeg Wind Farm	Tipperary	10 year development of 9 Wind Turbines and associated infrastructure.	Granted by ACP on 12/09/2024	Permitted	9

Pl. Ref	Wind Farm	County	Description	Decision	Status	No. of Turbines
KCC Pl. Ref. 25/60003 ACP Case Ref. PL10.322154	Briskalagh Wind Farm	Kilkenny	For a period of 10 years for a development at this site situated in the townlands of Acragar, Ballyconra, Ballycuddihy, Ballyroe, Ballyroe (Grace), Ballyroe (Maher), Baunaniska, Boherkyle, Briskalagh, Brittas, Clone, Coolnapisha, Curraghduff, Freshford, Freshford Lots, Graigueswood, Grange, Huntstown, Kilmanagh, Knockeenglass, Knockown, Moatpark, Monabrika, Monavadaroe, Moneenaun, Oldtown, Oldtownhill, Parksgrove, Picketstown, Rathealy, Sart, Sweethill, Tobernapeastia, Tullaroan, Upperwood Demesne, Co. Kilkenny. The development will consist of the provision of the following: i. 7 no. wind turbines with an overall turbine tip height of 185 metres; a rotor blade diameter of 163 metres; and hub height of 103.5 metres, and associated foundations and hard-standing areas; ii. A permanent 38kV substation compound (control building with welfare facilities, all associated electrical plant and apparatus, security fencing, underground cabling, storage containers, wastewater holding tank, site drainage and all ancillary works); iii. Permanent underground electrical (38kV) and communications cabling to the existing Ballyragget 110kV substation in the townland of Moatpark (including joint bays, communication and earth sheath link chambers and all ancillary works along the route). This cabling route is primarily located within the public road corridor which includes a Protected Structure (Kilkenny RPS Ref. C886); iv. Underground electrical (33kV) and communications cabling connecting the wind turbines and meteorological mast to the on-site substation; v. 3 no. temporary construction compounds (including site offices and welfare facilities); A meteorological mast with a height of 30 metres, security fencing and associated foundation and hard standng area; vii. A new temporary site entrance on the L1009; viii. A new gated site entrance on the L5024; ix. Upgrade of existing site tracks/ roads and provision of new site access roads, junctions and hardstand areas; x. A borrow pit; xi. Spoil Management; xii. Tree felling and hedgerow removal; xiii. Biodiversity Management and Enhancement Plan measures (including establishment of a riparian buffer and hedgerow enhancement); xiv. Site Drainage; xv. Operational Stage site signage; and xvi. All ancillary works and apparatus. A thirty five-year operational life from the date of full commissioning of the wind turbines and subsequent decommissioning of the wind turbines is being sought. An Environmental Impact Assessment Report and Natura Impact Statement has been prepared in respect of the proposed development and accompany this application.	Refused by KCC on 27/02/2025 Appealed and Granted by ACP on 21/08/2026	Permitted	7

Pl. Ref	Wind Farm	County	Description	Decision	Status	No. of Turbines
ACP Case Ref. PA92.321454	Brittas Wind Farm	Tipperary	Proposed development of 10 Wind Turbines, 110kV Electrical Substation and ancillary development.	Granted by ACP on 02/04/2026	Permitted	10
TCC Pl. Ref. 20/972	Farranrory Wind Farm	Tipperary	A ten year planning permission for a renewable energy development with a 40-year operational life (from the date of commissioning of the renewable energy development). The entirety of the development constitutes the provision of a 9-turbine wind farm and all associated works on lands in both Counties Tipperary and Kilkenny. This development comprises part of an overall development for which planning permission is also sought for a 38kV substation in the townland of Killeen, Co. Kilkenny. A separate planning application will be made for an underground grid connection to Tipperary County Council and to Kilkenny County Council. The proposed development will constitute the provision of the following: • Construction of up to 9 turbines each with a maximum overall ground to blade tip height of up to 150 metres and associated foundations and hardstand areas; • Construction of new site entrances and upgrade of existing site entrances; • Internal wind farm underground power and communications cabling; • Upgrade of existing access tracks and provision of new site access roads; • Removal of existing Meteorological Masts and construction of 1 new Meteorological Mast for monitoring wind speeds with a maximum height of up to 85 metres; • Site drainage network • Construction of a new temporary site compound for use during construction; • Two Borrow Pits • Construction of a new on-site 38kV substation The planning application will be accompanied by an Environmental Impact Assessment Report (EIAR) and Natura Impact Statement.	Granted by TCC on 30/03/2021	Permitted	9
TCC Pl. Ref. 23/60803			An amendment to the planning application previously granted permission under planning reference 20/972. The previously consented planning application included the construction of 9 turbines with maximum overall ground to blade tip height of up to 150 metres, associated foundations and hardstand areas; new site entrances, upgrade of existing site entrances; new on-site 38KV substation and all ancillary site works. The proposed amendments to the previously consented application comprise: (1) Increase the tip height of the turbines from 150 to 156.5 metres and increase the rotor diameter from 133 to 136 metres (3) Reconfiguration of a number of the consented hardstand layouts and associated changes to internal access roads (4) Minor Adjustments to the red line boundary (5) Provision of LiDAR (This application is accompanied by a NIS).	Granted by TCC on 10/01/2024		
LCC Pl. Ref. 16/260	Pinewoods Wind Farm	Laois	Construct 11 no. wind turbines, each with a maximum height of up to 136.5 metres, and all associated site development and ancillary works, including a 110kV electricity	Refused by LCC on	Permitted	11

Pl. Ref	Wind Farm	County	Description	Decision	Status	No. of Turbines
ACP Case Ref. PL11.248518			substation, switchroom and equipment compound; two single circuit strain towers with a maximum height of up to 26.5 metres; turbine foundations; crane hardstandings; 5.4 kilometres of site access tracks; underground electricity and communications cabling; site drainage works; 7 no. site entrances; a permanent meteorological mast with a maximum height of up to 85 metres; and temporary upgrade to the R430/L7800 road junction. The proposed development is part of a larger development which also extends onto lands in the townland of Crutt, Co. Kilkenny within the adjoining planning authority administrative jurisdiction of Kilkenny County Council. The proposed development as a whole will comprise 10 no. wind turbines, each with a maximum height of up to 136.5 metres, and all associated site development and ancillary works, including a 110kV electricity substation, switchroom and equipment compound; two single circuit strain towers with a maximum height of up to 26.5 metres; turbine foundations; crane hardstandings; 7.4 kilometres of site access tracks, underground electricity and communications cabling; site drainage works; 7 no. site entrances; a permanent meteorological mast with a maximum height of up to 85 metres; and temporary upgrade to the R430/L7800 road junction. This planning application is accompanied by an Environmental Impact Statement which includes an assessment of the likely impacts of the proposed development as a whole and in combination with the relevant off-site or secondary developments which will occur as a direct result of the proposed development, including connection to the national electricity grid. A Natura Impact Statement will also be submitted to the planning authority with the planning application.	19/04/2017 Appealed and Granted by ACP on 03/09/2019		
LCC Pl. Ref. 22/507 ACP Case Ref. PL11.316305			Amend the wind farm development permitted under An Bord Pleanála Reference PL11.248518 (Laois County Council Planning Register Reference 16/260) to provide: (i) an increase in the rotor diameter of the wind turbines from 103 metres to 117 metres; (ii) a reduction in the hub height of the wind turbines from 85 metres to 78 metres, thus retaining the permitted overall tip height of the wind turbines of 136.5 metres; (iii) the re-siting of wind turbines T8, T9, and T10 and their associated foundations and crane hardstandings by 3 metres, 5.5 metres and 10 metres respectively; and (iv) all associated site development, drainage, access and reinstatement works. This planning application is accompanied by an Environmental Impact Assessment Report/Environmental Impact Statement which includes an assessment of the likely effects of the proposed development, as a whole and In combination with the relevant off-site or secondary developments which will occur as a	Granted by LCC on 22/03/2023 Appealed and Granted by ACP on 16/09/2024		

Pl. Ref	Wind Farm	County	Description	Decision	Status	No. of Turbines
			direct result of the proposed development, including the infrastructure associated with the wind farm development permitted pursuant to Laois County Council Planning Register Reference 16/260 (An Bord Pleanála Reference PL11.248518) and Kilkenny County Council Planning Register Reference 17/62 (An Bord Pleanála Reference PL10.248392) and the electricity substation permitted pursuant to An Bord Pleanála Reference ABP-308448-20. This planning application is also accompanied by Natura Impact Statement.			
ACP Case Ref. PA01.315365	White Hill Wind Farm	Kilkenny and Carlow	Wind energy development consisting of 7 no. wind turbines and all associated works.	Granted by ACP on 21/11/2023	Permitted – Currently under Judicial Review	7
ACP Case Ref. PM01.319903			Proposed amendments to the previously authorised White Hill Wind Farm (ABP-315365-22) to alter the location of 2 number wind turbines.	Granted by ACP on 10/09/2024		
Old ACP Case Ref. PA11.317809 New ACP Case Ref. PA11.324343	Coolglass Wind Farm	Laois	for a ten year permission, for development comprising the construction of a wind farm and related works. The development will consist of: Construction of 13 No. wind turbines within two clusters with an overall ground to blade tip height of 180m. The wind turbines will have a rotor diameter ranging from 155m to 162m inclusive and a hub height ranging from 99 to 102.5m inclusive. Construction of permanent turbine hardstands and turbine foundations. Construction of 1 no. permanent 110 kV electrical substation including 2 no. control buildings with welfare facilities, all associated electrical plant and equipment, security fencing and gates, all associated underground cabling, wastewater holding tank, and all ancillary structures and works. Construction of a 33kV collector cable circuit connecting the wind farm two clusters along the L3851/Knocklead Road Construction of two temporary construction compounds with associated temporary site offices, parking areas and security fencing. Development of one on-site borrow pit. Construction of new permanent internal site access roads, upgrade of existing internal site access roads, including passing bays and all associated drainage infrastructure Development of an internal site drainage network and sediment control systems. All associated underground electrical and communications cabling connecting the wind turbines to the wind farm substation. All associated site development works including berms, landscaping, and soil excavation. Improvement of a site entrance to an existing access off the L3851/Knocklead local road to include localised widening of the road and creation of a splayed entrance to facilitate the	Refused by ACP on 23/08/2024 Decision Quashed by High Court and affirmed by Order of Supreme Court 18/03/2026 - Decision Pending	Refused - Quashed by High Court – New Reference –Decision Pending	13

Pl. Ref	Wind Farm	County	Description	Decision	Status	No. of Turbines
			delivery of abnormal loads and turbine component deliveries. Improvements include removal of existing vegetation for visibility splays to facilitate the use of the access for the delivery of construction materials to the site. A new site entrance slip road from the L3851 / Knocklead local road to facilitate the delivery of abnormal loads and turbine component deliveries. Works at this location require the removal of existing forestry to facilitate the use of the access for the delivery of construction materials to the site and for use during the operational phase. Construction related temporary upgrade works on the turbine delivery route to facilitate the delivery of turbine components to include the use of temporary road surfaces at a roundabout at the southern exit of Junction 16 of the M7, the R425/N80 roundabout and the R426 – L3851 junction. The erection of a permanent meteorological mast 102.5m in height A 35-year operational life from the date of commissioning of the entire proposed development.			
ACP Case Ref. PC10.313780	Gathabawn Wind Farm	Kilkenny	Windfarm development comprising between 13 and 18 wind turbines.	N/A	Proposed	12
ACP Case Ref. PAX92.324370	Littleton Wind Farm	Tipperary	The proposed Littleton Wind Farm comprising of 11 no. turbines and all associated works.	Application submitted to ACP on 15/06/2026 – Decision pending	Proposed	11
LCC Pl. Ref. 25/60414 ACP Case Ref. PL11.323775	Seskin Wind Farm	Laois	i. construct 2 no. wind turbines with an overall turbine tip height of 175 metres; a rotor blade diameter of 150 metres; and hub height of 100 metres, and associated foundations and hard standing areas; ii. Upgrade of existing tracks and roads and the provision of new site access roads; iii. Underground electrical and communications cabling connecting the wind turbines to a proposed 38kV on-site substation located in the townland of Ballynaslee Co. Kilkenny; iv. Accommodation works along the N77 National secondary road in the townland of Durrow Townparks, Co. Laois to facilitate the delivery of turbine components and other abnormal sized loads; v. Hedgerow Removal; vi. Biodiversity Management and Enhancement Plan measures (including establishment of new hedgerow, translocation of existing hedgerow and enhancement of existing hedgerow); vii. Spoil Management; viii. Site Drainage; ix. Operational stage site signage; and, x. All associated site development works, ancillary works and apparatus. A 10-year planning permission and 35-year operational life from the date of commissioning of the entire wind farm is being sought. An Environmental Impact	Refused by LCC on 02/09/2025 Appealed to ACP on 29/09/2025 – Decision pending	Proposed	8

Pl. Ref	Wind Farm	County	Description	Decision	Status	No. of Turbines
			Assessment Report (EIAR) and Natura Impact Statement (NIS) accompany this planning application.			
KCC Pl. Ref. 25/60418 ACP Case Ref. PL10.323759		Kilkenny	For development at this site.The proposed development, subject of this application, will consist of: i. The construction of 6 no. wind turbines with an overall turbine tip height of 175 metres; a rotor blade diameter of 150 metres; and hub height of 100 metres, and associated foundations and hard standing areas; ii. A permanent 38kV substation compound (control building with welfare facilities, all associated electrical plant and apparatus, security fencing including vegetative screening, underground cabling, wastewater holding tank, site drainage and all ancillary works); iii. Permanent underground electrical (38kV) and communications cabling to the existing Ballyragget 110kV substation in the townland of Moatpark (including joint bays, communication and earth sheath link chambers and all ancillary works along the route); iv. Underground electrical and communications cabling connecting the wind turbines and meteorological mast to the on-site substation; v. A meteorological mast with a height of 100m above ground and associated foundation and hard-standing area; vi. Upgrade of existing tracks and roads and the provision of new site access roads; vii. All works associated with the upgrade of the existing agricultural access off the L58333 local road (including the installation of fencing and steel gates); viii. 2 no. temporary construction compounds (including temporary site offices and welfare facilities); ix. Accommodation works along the N77 National secondary road in the townland of Ballynaslee, Co. Kilkenny to facilitate the delivery of turbine components and other abnormal sized loads; x. A borrow pit; xi. Spoil Management; xii. Hedgerow removal; xiii. Biodiversity Management and Enhancement Plan measures (including establishment of new hedgerow, translocation of existing hedgerow and enhancement of existing hedgerow); xiv. Site Drainage; xv. Operational stage site signage; and, xvi. All associated site development works, ancillary works and apparatus. A 10-year planning permission and 35-year operational life from the date of commissioning of the entire wind farm is being sought. An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) accompany this planning application.	Refused by KCC on 02/09/2025 Appealed to ACP on 29/09/2025 – Decision pending		

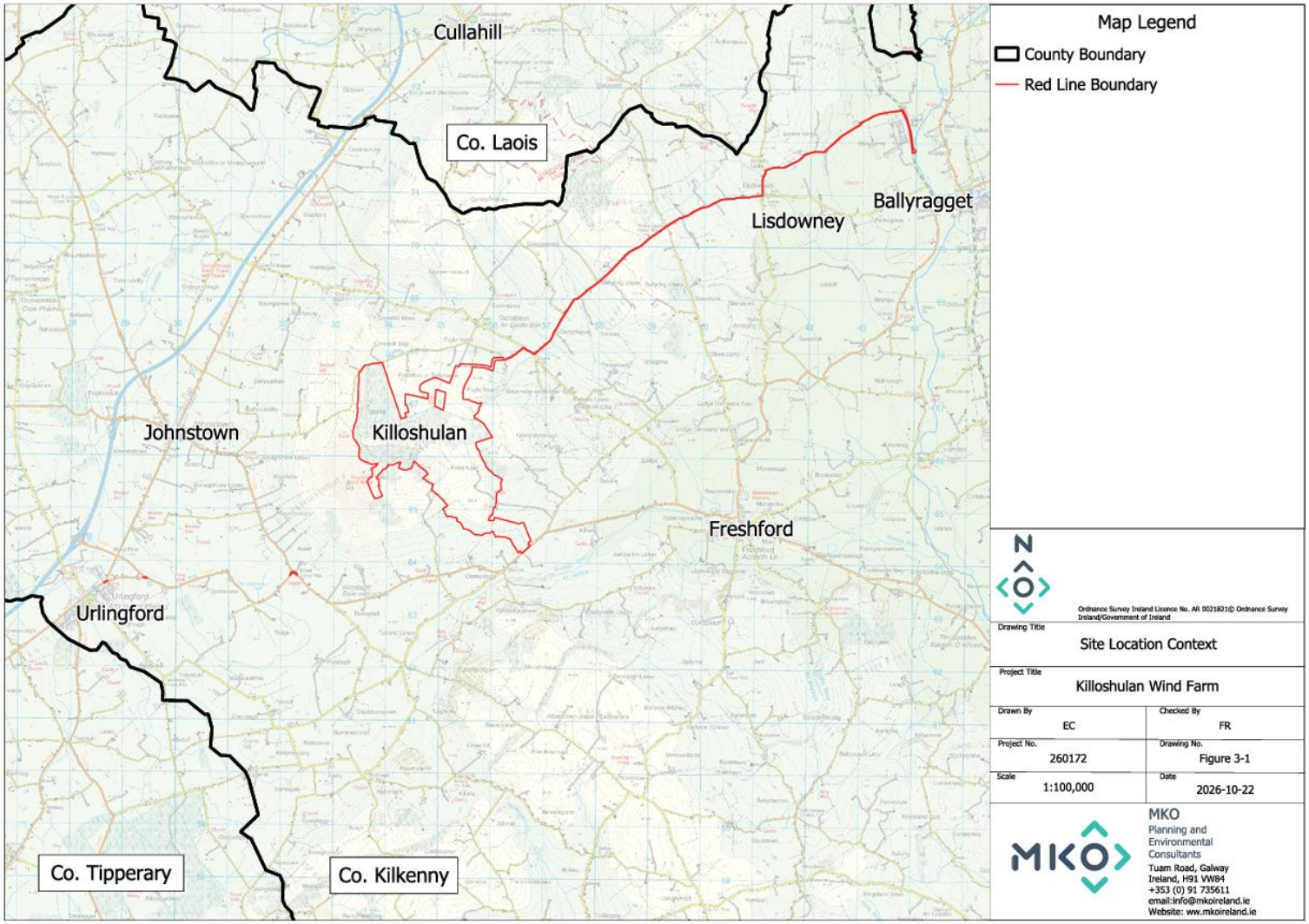


Figure 3-1 Site Location Context

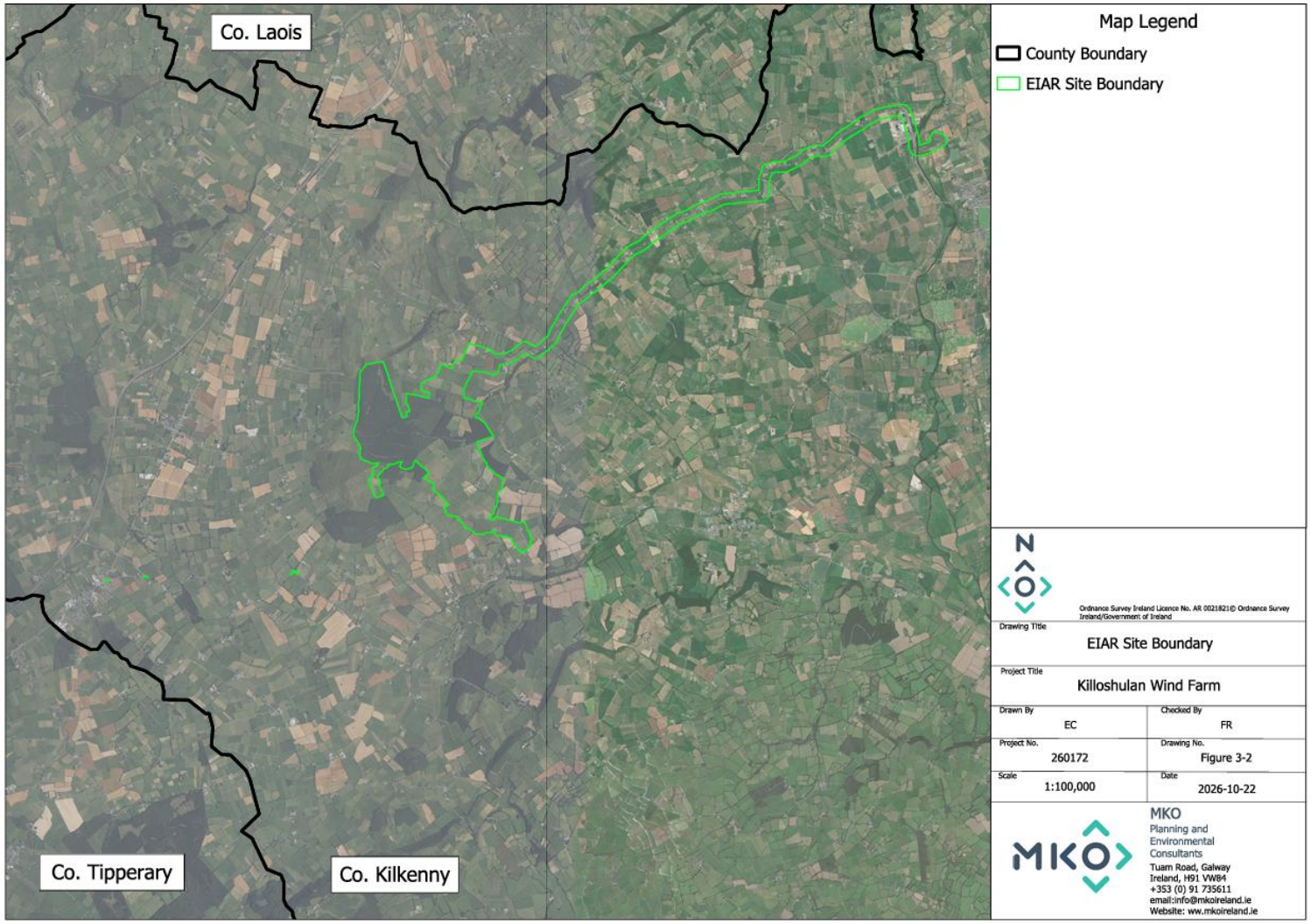


Figure 3-2 EIAR Site Boundary

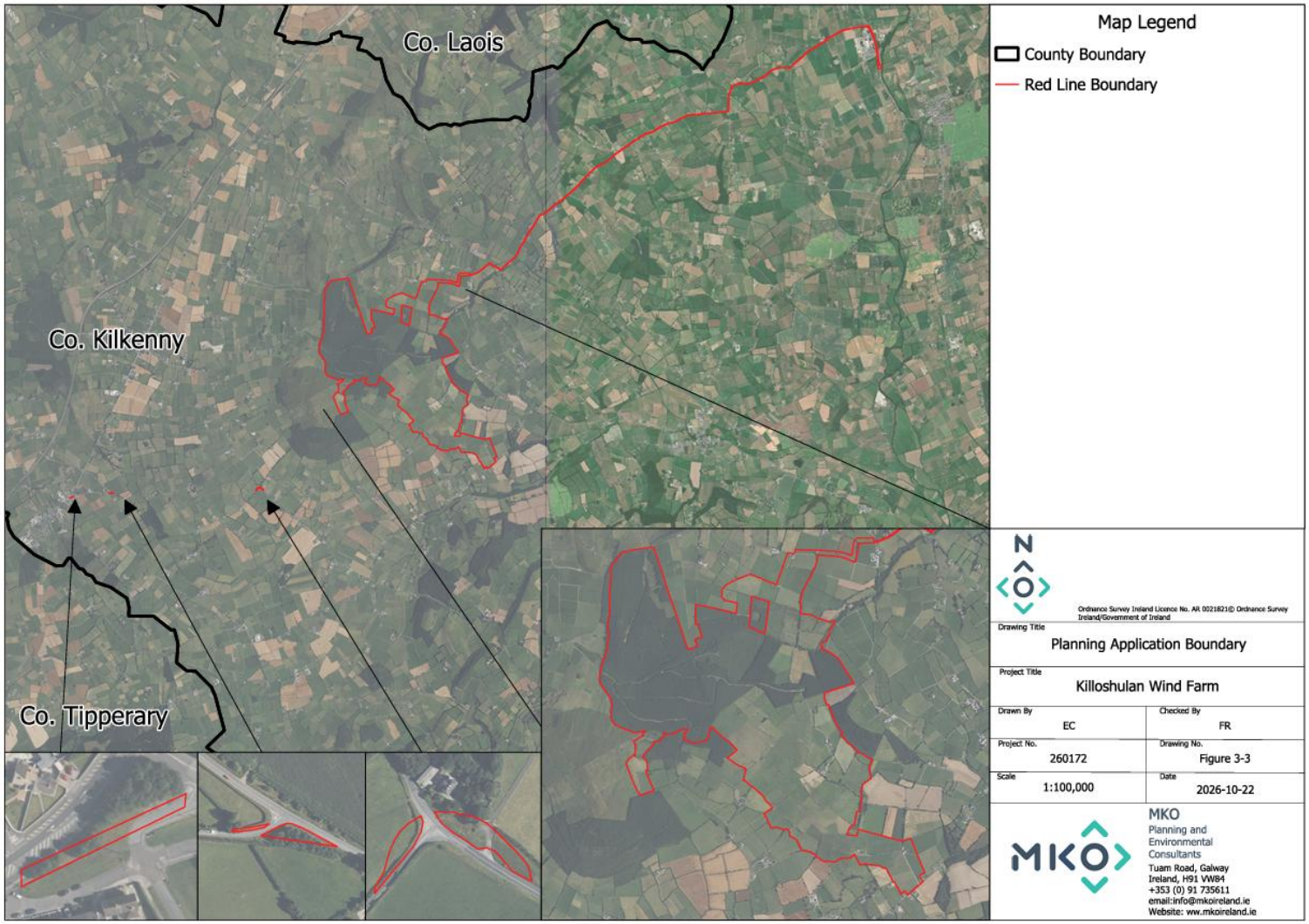


Figure 3-3 Planning Application Boundary

4. CONSULTATION

This section of the Planning Report outlines the pre-application consultation undertaken by the Applicant for the Proposed Project. This includes Scoping as part of the EIAR, pre-application meetings with KCC, the Commission, and consultation with the local community.

4.1 EIAR Scoping

Scoping is the process of determining the content, depth and extent of topics to be covered in the environmental information to be submitted to a competent authority for projects that are subject to an EIA. This process is conducted by contacting relevant authorities and Non-Governmental Organisations ('NGO') with interest in the specific aspects of the environment with the potential to be affected by the proposal. These organisations are invited to submit comments on the scope of the EIAR and the specific standards of information they require. Comprehensive and timely scoping helps ensure that the EIAR refers to all relevant aspects of the Proposed Project and its potential effects on the environment and provides initial feedback in the early stages of the EIAR preparation, when alterations are still easily incorporated into the design. In this way scoping not only informs the content and scope of the EIAR, but it also provides a feedback mechanism for the proposal design itself.

As part of the constraints mapping process, which is detailed in **Chapter 3** of the EIAR, telecommunications operators, were contacted in January 2022 in order to determine the presence of telecommunications links or aviation assets traversing or located in close proximity to the Proposed Wind Farm. Table 2-6 of Chapter 2 of the EIAR represents the latest scoping response received from all rounds of telecom scoping undertaken.

Following this initial exercise, an EIAR scoping document, providing details of the Proposed Project, was prepared by MKO and circulated in January 2022. The scoping document provided details of the Proposed Project and set out the scope of work for the EIAR. Consultees were invited to contribute to the EIAR by suggesting baseline data, survey techniques and potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR.

A revised scoping exercise was carried out in May 2026 due to time elapsed from when previous scoping was carried out, updates in local and national policy and legislation, updates in relevant EIAR guidance, changes in the environmental baseline and refinement of the Proposed Project layout and design. Consultees were invited to contribute again to the EIAR, following these changes.

Copies of all scoping responses received are included in **Appendix 2-1** of the EIAR. The recommendations of the consultees have informed the scope of the assessments undertaken and the contents of the EIAR.

4.2 Pre-Application Meetings

4.2.1 Kilkenny County Council

Two pre-application meetings were held with KCC under the provisions of Section 247 of the Planning Act in relation to the Proposed Project. Both meetings included attendees from the Applicant and the Agent ('the project team') and KCC.

The pre-application consultation meetings are summarised in Table 4-1 below. Further detail is provided in relation to each meeting in Section 2.7.3 in Chapter 2 of the EIAR.

Table 4-1: Kilkenny County Council Pre-Application Consultation Summary

Meeting Details	Matters Discussed

1st Meeting **7th of September 2022** **Online via Microsoft Teams**	The project team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information: › Introduction to the Proposed Project, the Applicant and the project team › Overview of the Site location and site selection process › Proposed Wind Farm design, Proposed Grid Connection design, and the proposed haul route › Site constraints, environmental designations, and habitats › Surveys completed to date › Environmental Impact Assessment Report › Landscape and Visual Impact Assessment › Planning policy context › Proposed Project timeline Following this presentation, there was further discussion held between the project team and the representatives of KCC. Matters discussed included: › National planning policy context › Local planning policy context including the Draft Ministerial Direction and the Wind Energy Strategy › Significance of overriding public interest › Permitted works to the N77 and the Proposed Grid Connection Route › Scoping, community consultation and community benefit › Site constraints › Ecology › Landscape and visual › Archaeology › Planning application contents
2nd Meeting **17th June 2026** **Online via Microsoft Teams**	The project team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information: › Introduction, Agenda, Proposed Project progress, and the previous pre-planning meetings held with KCC and the Commission › Need for the Proposed Project to achieve European and national targets › SID policy context, Renewable Energy Directive ('RED III'), national, regional and local policy, KCCDP (as varied) Wind Strategy Areas › Community benefit and engagement › Site background, Proposed Wind Farm and the Proposed Grid Connection › Site selection and constraints › Proposed Grid connection route › Designated sites and biodiversity › EIA Scoping exercise, connectivity to designated sites and biodiversity › Ornithology, including key ornithological receptors and potential impacts › Water › Geology and karst investigations › Noise and shadow flicker › Landscape and Visual Impact Assessment › Other material assets, transport delivery route and temporary construction entrance › Planning application documents and drawings › Project timeline and conclusion Following this presentation, there was further discussion held between the project team and the representatives of KCC. Matters discussed included: › Local planning policy context including the KCCDP (as varied) Wind Energy Strategy

	› EIA Scoping exercise and KCC response › Proposed Grid Connection route and construction methodology › Groundwater considerations › Drainage › Noise monitoring and policy context › Cumulative visual impact of the Proposed Wind Farm and exiting Wind Farms

4.2.2 An Coimisiún Pleanála

SID pre-application consultations were opened with the Commission in July 2022 in respect of both the Proposed Wind Farm (ACP Case Ref. 314186), under Section 37B of the Planning Act, and the Proposed Grid Connection (ACP Case Ref. 314187), under Section 182E of the Planning Act. 3 no. pre-application consultation meetings were subsequently held with the Commission to discuss the Proposed Project and to determine whether it met the thresholds of the Seventh Schedule of the Planning Act.

The pre-application consultation meetings are summarised in Table 4-2 below. Further detail is provided in relation to each meeting in Section 2.7.3 in Chapter 2 of the EIAR.

Table 4-2: An Coimisiún Pleanála Pre-application Consultation Summary

Meeting Details	Matters Discussed
1st Meeting 13th of October 2022 Online via Microsoft Teams	The project team gave an overview of the Proposed Project in the form of a presentation which set out the following information: › Introduction from the Commission and various procedures involved › Introduction to the Proposed Project, the Applicant and the project team › Description of SID criteria › Policy context, Wind Energy Strategy, Draft Ministerial Direction, and Landscape Character Assessment › Site Selection › Design process › Project timeline Following this presentation, there was further discussion held between the project team and the representatives of the Commission. Matters discussed included: › Planning strategy and justification, including submission of a Section 182A SID planning application for the Proposed Grid Connection and a Section 37E SID planning application for the Proposed Wind Farm › Local planning policy context, Ministerial Direction, Wind Energy Strategy and the location of the Proposed Wind Farm turbines › Archaeology › Ecology and NIS › Land, Soils and geology › Cumulative Impact Assessment of Proposed Wind Farm and existing wind energy developments › Proposed Wind Farm turbine specifications
2nd Meeting 22nd of June 2026 Online via Microsoft Teams	The project team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information: › Introduction to the Proposed Project, the Applicant and the project team › Meeting Agenda, 1st pre-planning meeting and the Proposed Project progress to date

	› Proposed Wind Farm and the Proposed Grid Connection › Withdrawal of Section 182E pre-application consultation › Community engagement undertaken to date › SID planning policy context, RED III, national, regional and local policy, Wind Energy Strategy Areas, site level constraints, and the reduction of viable areas, with viable areas being within areas deemed as not normally permissible. › EIA Scoping, pre-application consultation and public consultation › Designated sites and biodiversity, river crossing, significant European sites › Ornithology, stated importance of cumulative assessment for birds › Hydrology › Geology and karst investigations › Noise and shadow flicker › Landscape and Visual Impact Assessment › Other material assets, traffic and transport, transport delivery route and proposed site entrance › Proposed Project timeline Following this presentation, there was further discussion held between the project team and the representatives of the Commission. Matters discussed included: › Submission of the Proposed Project which comprises the Proposed Wind Farm and the Proposed Grid Connection under the provisions of Section 37E of the Planning Act › Withdrawal of Section 182E pre-application consultation › Inclusion of Battery Energy Storage System › Further pre-application meetings
3rd Meeting 15th of September 2026 Online via Microsoft Teams	The project team gave an overview of the Proposed Project in the form of a PowerPoint presentation which set out the following information: › Introduction to the Proposed Project › Proposed Wind Farm and the Proposed Grid Connection › Local Policy Context – Wind Energy Strategy Areas and Draft Ministerial Direction › SID Criteria and Part 4, Chapter 4 of the 2024 Planning Act › EIA Scoping and pre-application consultation › Biodiversity, designated sites, and key ecological receptors › Ornithology and key ornithological receptors › Hydrology, hydrogeology, geology and karst › Noise and shadow flicker › Landscape and Visual Impact Assessment › Cultural heritage › Material assets, traffic and transport, other material assets and transport delivery route › Planning Application Documents, Drawings, EIAR and NIS › Proposed Project timeline Following this presentation, there was further discussion held between the project team and the representatives of the Commission. Matters discussed included: › Local Policy Context › The Planning and Development Act 2024 › Climate Action Plan 2026 › Biodiversity, designated sites, and key ecological receptors › Ornithology and key ornithological receptors › Hydrology, hydrogeology, geology and karst › Noise and shadow flicker › Landscape and Visual Impact Assessment

	› Cultural heritage › Traffic and transport › EIAR Chapters and Appendices › Proposed Project timeline and the SID Determination

SID Determination

Following discussions during the first pre-application meeting with the Commission, which was held under the provisions of Section 182E and Section 37B of the Planning Act, it was proposed to submit a single SID planning application for the Proposed Project which includes both the Proposed Wind Farm and the Proposed Grid Connection under the provisions of Section 37E of the Planning Act, subject to an SID determination from the Commission. This proposal was discussed with the Commission during the second pre-application meeting, which was held under the provisions of Section 37B of the Planning Act. During this discussion the representatives of the Commission advised that the Applicant should withdraw the Section 182E pre-application consultation request. On the 18th of August 2026, the Applicant issued a letter to the Commission requesting the withdrawal of the Section 182E pre-application consultation request, the Commission confirmed the withdrawal of the request in a letter from the Commission dated the 19th of August 2026. As such, the SID planning application for the Proposed Project will be submitted to the Commission in accordance with Section 37E of the Planning Act 2000.

An SID Determination Letter received from the Commission dated the 9th October 2026 stated that under Section 37B, it is the opinion of the Commission that the Proposed Project falls within the scope of the paragraphs 37A(2)(a) and (b) of the Planning Act. This confirmed that the Proposed Project constitutes SID and therefore the planning application should be made directly to the Commission.

4.3 Community Consultation

The community consultation carried out for the Proposed Project was based around engaging with the local community in an open, honest and transparent manner with the aim to not only provide clear and understandable information but also to gain feedback to understand the views of the local community.

To inform local residents about the Proposed Project, Mark Higgins of MKO was appointed as Community Liaison Officer (CLO) on the project. In 2026, Declan Dooley of Morland Land Property Services Ltd took over the role as CLO on the project. The CLO has the responsibility for acting as the first point of contact for members of the public with questions or queries about the Proposed Project.

The CLO provided an introductory information pack which was delivered via door-to-door consultation to all householders within a c.1.5km radius of the Proposed Project site, in April 2026. The information distributed to each household consisted of a company brochure, which provided information on the Proposed Project, such as the location of the development study area, the estimated project timeline and contact details. Residents were also given a feedback questionnaire (please see Appendix 2-2 of the EIAR) and asked to respond with any concerns or questions they may have. The questionnaire asked four questions about the development:

- If the Proposed Project is developed, what types of benefits should the Killoshulan Wind Farm provide to the local community?
- Do you have any concerns about this Proposed Wind Farm and if so, what are they?
- Have you any further comments in relation to the Proposed Project?
- Killoshulan Renewable Energy Limited is committed to keeping the local community informed about the Proposed Project. Please help us identify any other local groups which you feel should be consulted with.

Following the initial notification of the proposal to the local community, the CLO liaised with interested parties in helping them to understand the proposal and respond to any queries or concerns raised.

In August 2026, the project CLO recommenced a programme of 'door-knocking' and a leaflet drop, including an advertisement for the upcoming Public Information Event (PIE) to be held on Tuesday, September 1st, 2026. The venue chosen for the event was the Graine Community Hall, County

Kilkenny, this location was chosen during feedback from the local residents closest to the Proposed Wind Farm site. While revisiting all the houses within a 1.5km distance from the Proposed Project site, alongside all schools and GAA / sports clubs servicing the catchment area, and all local shops and business in the locality the CLO took this time to explain how the Proposed Project had evolved and how feedback from the first Door-to-Door event. The CLO also explained the channels available to the residents to get in touch with the project team remained available and encouraged those who wished to discuss the Proposed Project further to reach out via those channels.

In September 2026, following the feedback from the first PIE, there was supporting information uploaded to the Virtual Consultation Room on the project website to help provide further information on the main concerns raised at the PIE.

The consultation process has been an extremely valuable exercise and has provided a detailed, and enhanced understanding of the key issues and concerns of the local community. There is currently on-going consultation with the local community, and it is the intention of the Applicant to continue with the consultation for the entire lifespan of the Proposed Project.

The development of the Proposed Project will provide an enduring economic benefit to the communities surrounding the Proposed Project, through the community benefit package for residents and community groups, employment during the construction and operation of the Proposed Project and through the annual rates payable to the Local Authority.

Please refer to the Community Engagement Report at **Appendix 2-2** of the EIAR for further details.

5. PROPOSED DEVELOPMENT

5.1 Proposed Development Description

This section of the Planning Report describes the Proposed Development. The development description for the current SID planning application as it appears in the public notices is as follows:

> *"In accordance with Section 37E of the Planning and Development Act 2000 (as amended) Killoshulan Renewable Energy Limited gives notice of its intention to make an application to An Coimisiún Pleanála for permission for a renewable energy development in the townlands of Barna, Killoshulan, Spahill, Frankford or Ballykieran, Foyle South, Clomantagh (Mt. Garret), Urlingford, Mountfinn, Balief Lower, Balief Upper, Coolcashin, Garrydague, Ballygowney, Ballyring Upper, Lisdowney, Seskin Little, Seskin North, Seskin South and Ballyconra, Co. Kilkenny.*
>
> *This development is covered by the provisions of the Renewable Energy Directive III (Directive 2023/2413) and the planning application is subject to a completeness check under section 37JA of the Planning and Development Act 2000, as amended by the European Union (Planning and Development) (Renewable Energy) Regulations 2025. The proposed development will consist of the provision of the following:*
>
> i. *The construction of 10 no. wind turbines with an overall turbine tip height of 185 metres; a rotor blade diameter of 163 metres; and hub height of 103.5 metres, and a meteorological mast of 103.5m in height and subsequent decommissioning of the wind turbines and meteorological mast, following a 35-year operational life from the date of full commissioning of the wind turbines;*
> ii. *Turbine and meteorological mast foundations, hard-standing and assembly areas;*
> iii. *A 110kV substation compound (2 no. control buildings with welfare facilities, all associated electrical plant and equipment, security fencing, access gates, all associated underground cabling, wastewater holding tanks, rainwater holding tanks, site drainage and all ancillary works);*
> iv. *Underground internal wind farm electrical cabling and communications cabling connecting the wind turbines to the proposed on-site 110kV electrical substation and associated ancillary works;*
> v. *All works associated with the upgrade of the existing agricultural access off the R693 Regional Road (including the installation of fencing and steel gates) to serve as the main site entrance for the wind farm;*
> vi. *The provision of 1 no. new access/egress point along the R693 Regional Road;*
> vii. *The provision of 1 no temporary access/egress point along the L1805;*
> viii. *Upgrade of existing tracks/roads and junctions and provision of new site access roads and junctions;*
> ix. *2 no. temporary construction compounds with temporary offices and staff welfare facilities;*
> x. *Accommodation works along the public road network in the townlands of Urlingford, Mountfinn, Balief Lower, Balief Upper, and Barna Co. Kilkenny to facilitate the delivery of turbine components and other abnormal loads;*
> xi. *1 no. Borrow Pit;*
> xii. *Spoil Management;*
> xiii. *Site Drainage;*
> xiv. *Tree Felling and hedgerow removal;*
> xv. *Biodiversity Management and Enhancement Measures;*
> xvi. *Operational stage site signage;*
> xvii. *Battery Energy Storage System (BESS) and all associated electrical plant and equipment, security fencing, 2 no. static water storage tanks and a firewater retention tank, and all associated infrastructure and apparatus;*
> *xviii. The provision of approximately 12km of underground electrical (110kV) and communications cabling from the proposed on-site 110kV electrical substation to the*

western boundary of the River Nore to facilitate a future connection to the national grid via the existing Ballyragget 110kV electrical substation;

xix. *Provision of 17 no. joint bays, communication chambers and earth sheath links along the proposed underground electrical cabling route;*
xx. *Reinstatement of land, road and track surface above the proposed cabling trench; and*
xxi. *All related site works and ancillary development considered necessary to facilitate the proposed development, including landscaping and the reinstatement of land.*

A 10-year planning permission and a 35-year operational life of the wind farm from the date of full commissioning is sought.

An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) have been prepared in respect of the construction, operation and decommissioning of the proposed development and accompany the planning application. The EIAR and NIS assess both the full extent of the proposed development as described above in i – xxi and integral elements of the wider project infrastructure, consisting of the provision of approximately 700m of underground electrical (110kV) and communications cabling between the western boundary of the River Nore and the existing Ballyragget 110kV electrical substation in the townland of Moatpark, Co. Kilkenny to facilitate the connection to the national grid and which will be the subject of a separate, future planning application to the relevant consenting authority."

The Proposed Wind Farm will have a generating capacity of approximately 62MW. A full description of the Proposed Project is provided in Chapter 4 of the EIAR. The Proposed Project layout is illustrated in Figure 5-1 below.

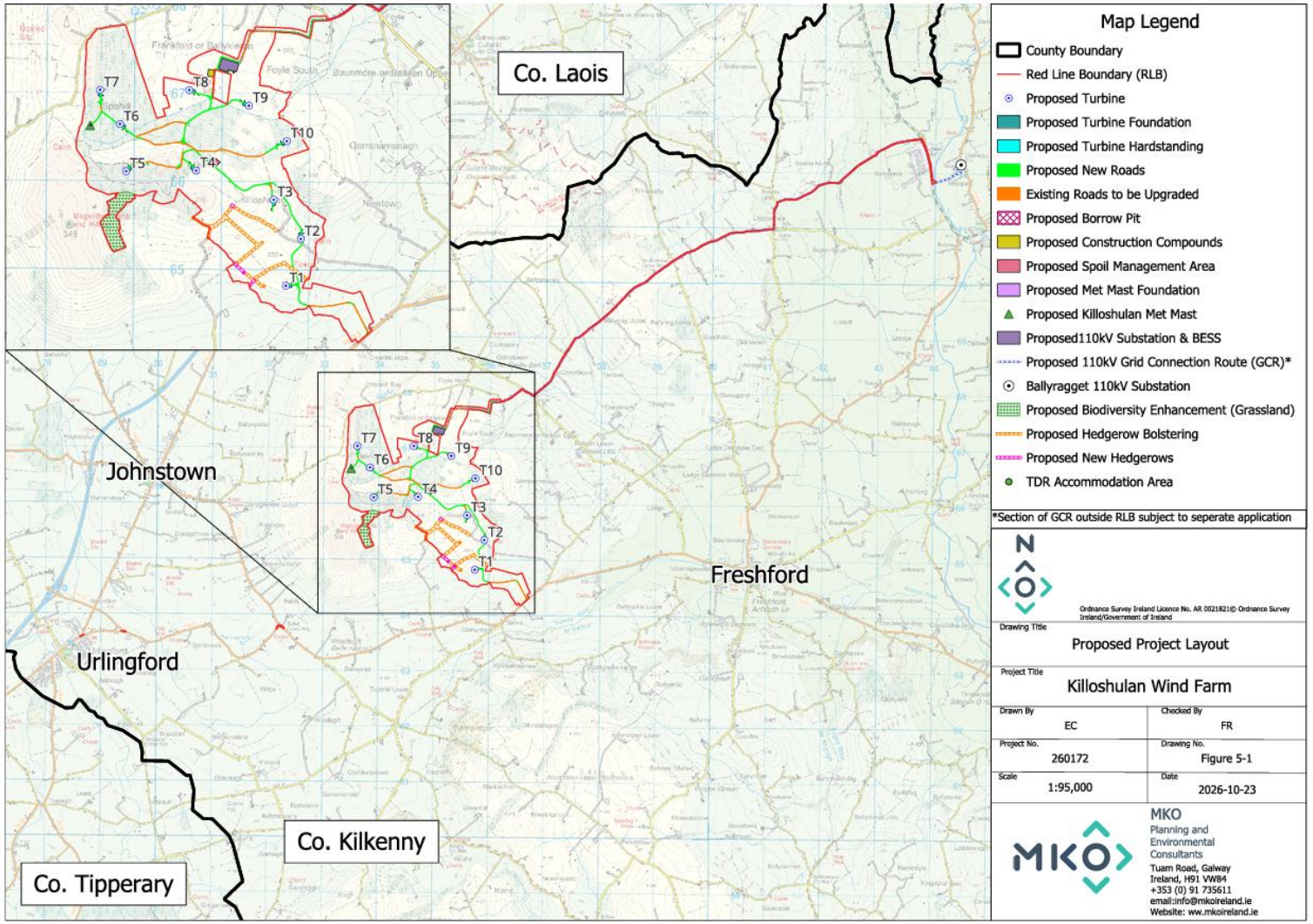


Figure 5-1 Proposed Project Layout

5.2 Proposed Project Design Process

The design of the Proposed Wind Farm has been an informed and collaborative process from the outset, involving the designers, developers, engineers, landowners, environmental, hydrological, archaeological, traffic specialists, statutory and non-statutory stakeholder and the local communities.

Throughout the preparation of the EIAR, the layout of the Proposed Wind Farm has been revised and refined to take account of the findings of all site investigations and baseline assessments, which have brought the design from its initial layout, through an interim layout to the Proposed Wind Farm layout. The design process has also considered the recommendations and comments of the relevant statutory and non-statutory organisations, the local community and local authorities (as detailed in Chapter 2 of the EIAR) while seeking to ensure that a viable project can be constructed and connected to the national grid.

5.2.1 Strategic Site Selection

As the cost of building each MW of electricity generating capacity in a wind farm is in the region of €1.5 million, it is critical that the most suitable site for the Proposed Project is chosen.

As set out in Section 3.1 of this Planning Report, the Applicant, Killoshulan Renewable Energy Limited, is a subsidiary of AIR, which is an Irish-owned Limerick-based company with extensive experience in renewable energy and is responsible for multiple projects throughout Ireland. MKO, on behalf of AIR, undertook a detailed site identification process, through Geographical Information Systems (GIS) software, within multiple counties and has led to the identification of a number of sites which AIR has brought forward into the planning system, and further sites under consideration including the Proposed Project site and others in Co. Galway and Co. Cork.

Site selection for the development of a wind farm must be suitable for consideration under a number of criteria, such as:

- Grid Access/ Capacity
- Wind Resource Assessment
- County Development Plans and Zoning
- Proximity to Houses
- Population Density
- Environmental Sensitivity
- Landscape Capacity/ Cumulative Impact
- Site Scale
- Communications Infrastructure
- Flood Plain Analysis
- Supporting Infrastructure

Local Policy

The site falls across the administrative area of KCC and therefore, is subject to the planning policies and objectives set out in the KCCDP (as varied).

County Kilkenny's Wind Energy Strategy[1] identifies areas within the County according to a hierarchy from the most optimal down to areas not generally considered suitable. There are three categories within the Wind Energy Strategy:

- Open for Consideration for Wind Energy development
- Not deemed Suitable for Wind Energy Development
- Not Normally Permissible for Wind Energy Development

[1] https://kilkennycoco.ie/eng/services/planning/development-plans/city-and-county-development-plan/city-and-county-development-plan-2021-appendices.pdf

The Proposed Wind Farm turbines are located in various areas as per Figure 11 Wind Strategy Areas of the KCCDP (as varied), specifically Turbine 1 (T1) and T2 are located in an 'Acceptable in Principle' (AIP) area, and all other proposed turbines (T3-T10) are located in a 'Not Normally Permissible' area as shown in Figure 7-1. A detailed site-specific constraints assessment has been undertaken as part of the design process as detailed in **Section 3.2.5.2** in **Chapter 3** of the EIAR which demonstrates that the Site is considered a suitable location for the provision of a renewable energy development of the scale proposed. **Table 3-2** of **Chapter 3** of the EIAR presents the findings of the site-specific assessment for the Proposed Project and includes the basis for assessment and potential environmental effects associated with each of the key site selection criteria.

Section 7.2 below provides further information on the KCCDP (as varied) and County Kilkenny Wind Energy Strategy.

Environmental Sensitivities

The Proposed Wind Farm is not located within any area designated for ecological protection. The Proposed 110kV Underground Cabling route crosses the River Nore Special Protection Area (SPA), and River Barrow and River Nore Special Area of Conservation (SAC) in the townland of Moatpark, Co Kilkenny. At this location, the Proposed 110kV underground cabling route will cross the river via horizontal direction drilling (HDD), with the drilling commencing within the N77 national secondary road verge, and finishing in agricultural land, outside of the European designated sites. The Proposed 110kV Underground Cabling route also crosses the River Nore/Abbeyleix Woods Complex proposed Natural Heritage Area (pNHA) at this location. One of the drilling pits required for HDD is located within the boundary of the pNHA, although it is located within agricultural grassland.

The nearest Natura 2000 site to the Proposed Wind Farm site is the Spahill and Clomantagh Hill SAC, which is located approximately 263m southeast of the Proposed Wind Farm infrastructure at its nearest point. The Spahill and Clomantagh Hill SAC borders the Site and is adjacent to the proposed grassland enhancement area. The Spahill and Clomantagh Hill SAC is a semi-natural dry grasslands and scrubland facies on calcareous substrate. The proposed grassland enhancement area beside the SAC will enhance the extent and connectivity between habitats, this is described further in the proposed Biodiversity Enhancement and Management Plan ('BEMP') (please see Appendix 6-4 of the EIAR for further details).

The closest Natural Heritage Area (NHA) or pNHA, is Spahill and Clomantagh Hill pNHA, which is located approximately 263m southeast of the Proposed Wind Farm infrastructure at its nearest point.

The Proposed Wind Farm site is located primarily on lands comprising of commercial forestry, agricultural pastural land, mixed forest and transitional woodland-shrub.

Population Density and Proximity to Houses

The Applicant sought to identify an area with a relatively low population density to allow for appropriate setback distances from residential sensitive receptors. Having reviewed the settlement patterns in the vicinity, the study area has emerged as suitable to accommodate the Proposed Wind Farm. The population density of the Population Study Area of the Proposed Wind Farm as described in the Population and Human Health section of the EIAR is 24.6 persons per square kilometre, as described in Chapter 5 of the EIAR. This is significantly lower than the average national population density of 73.3 persons per square kilometre. The Proposed Turbine positions achieve the recommended setbacks in both the Wind Energy Development Guidelines published by the then Department of Environment, Heritage and Local Government (DoEHLG) in June 2006 ('the Guidelines') (500m) and the draft Revised Wind Energy Development Guidelines published by the then Department of Housing, Planning and Local Government (DoHPLG) in December 2019 ('the Draft Guidelines') (4 x the proposed turbine tip height). The nearest settlement to the Proposed Turbines is the village of Johnstown, Co. Kilkenny located approximately 3.8km southwest of T7.

Site Scale

The Site, covering a total of 796 hectares, with the Proposed Wind Farm site measuring 573 ha comprises a mix of commercial forestry, agricultural pastural land, mixed forest, transitional woodland-shrub and public road corridors. The Proposed Wind Farm site has an elevation range of approximately 300 to 316 meters above ordnance datum (mAOD) at its highest point in the southwest to approximately 120 mAOD at its lowest point at its southeastern boundary of the Proposed Wind Farm site. Land-use in the wider vicinity of the Site comprises a mix of agriculture, commercial and private forestry, low density residential, quarrying, renewable energy, industrial and commercial uses. The Proposed Wind Farm site benefits from existing forestry and agricultural tracks (approximately 10.7km). The Proposed Wind Farm site is easily accessible via a site entrance off the R693 Regional Road along the southern boundary of the Proposed Wind Farm site in the townland of Barna, Co. Kilkenny. The Site comprises habitats of low ecological value and the recommended setback distance to sensitive receptors is achieved. The constraints and facilitators mapping process is outlined in Section 3.2.5.2.1 of Chapter 3 of the EIAR.

Summary

From the review of the criteria set out in Section 3.2.3.2 of Chapter 3 of the EIAR, the Site is considered a suitable location for the provision of a renewable energy development of the scale proposed. The Proposed Wind Farm is located on agricultural land and commercial forestry which allows the Site to take advantage of the existing access roads (some of which will be upgraded) and highlights the suitability of the Proposed Wind Farm as it can make sustainable use of established items of infrastructure.

The Proposed Wind Farm site is not located within European Union ('EU') or national protected areas. An area of exposed limestone pavement and dry grassland is located southeast of T4. The exposed limestone pavement exhibits an affinity with the Annex I Priority Habitat [8420] and dry grassland an affinity with semi-natural dry grasslands [6210]. Accordingly, owing to its high conservation significance and Priority Annex I status, the habitat has been assessed as being of County Importance. However, the Proposed Project has been designed to completely avoid this habitat and therefore, will have no effect on EU or national protected areas.

The Proposed Wind Farm site is located adjacent to the Spahill and Clomantagh Hill SAC and the Spahill and Clomantagh Hill pNHA. The Proposed Wind Farm site is located primarily on agri-pastoral lands and mixed/commercial forestry, of low ecological value, within a rural setting. Required setbacks from sensitive receptors, as set out in Section 3.2.3.2 of Chapter 3 of the EIAR are achievable. The Proposed Grid Connection underground cabling route crosses the River Nore SPA, and the River Barrow and River Nore SAC in the townland of Ballyconra, Co. Kilkenny. At this location, the proposed underground cabling route will cross the river via HDD, with the drilling commencing and finishing in agricultural land, outside of the SAC.

From the review of the criteria set out in Section 3.2.3.2 of Chapter 3 of the EIAR, the Proposed Grid Connection was identified for the provision of a connection of the Proposed Wind Farm to the national electricity grid. The Proposed 110kV Underground Cabling route is located primarily within the public road corridor and does not directly interact with any environmental designations. The Proposed 110kV Underground Cabling route overlaps with the River Nore SPA, and the River Barrow and River Nore SAC when crossing the River Nore along its route. However, there are no instream works proposed as part of the Proposed 110kV Underground Cabling route construction, so no significant impacts have been identified.

Factoring all required environmental constraints into the project design, a site of considerable scale, with an estimated installed capacity of approximately 62MW, and potential to power approximately 49,560 Irish households with renewable energy and displace 28,277 tonnes of carbon dioxide per annum (989,687 tonnes over the 35-year operational life), the Site is considered appropriate for wind energy development and represents a positive contribution to national and EU climate action targets.

5.2.2 Detailed Constraints and Facilitators Mapping

The design and layout of the Proposed Wind Farm follows the recommendations and guidelines set out in the Guidelines and the *'Best Practice Guidelines for the Irish Wind Energy Industry'*[2] (Irish Wind Energy Association, 2012).

The Guidelines are currently the subject of a targeted review. The proposed changes to the assessment of impacts associated with onshore wind energy developments are outlined in the document *'Proposed Revisions to Wind Energy Development Guidelines 2006 – Targeted Review'* (2013), the '*Review of the Wind Energy Development Guidelines 2006 – Preferred Draft Approach'* (June 2017), and the Draft Guidelines. A consultation process in relation to the Draft Guidelines closed on 19th February 2020. The proposed changes presented in the Draft Guidelines give certain focus on the setback distance from residential properties (four times the proposed maximum tip height), along with shadow flicker and noise requirements relative to sensitive receptors. At time of writing, Draft Guidelines have not yet been adopted, and the relevant guidelines for the purposes of Section 28 of the Planning Act, remain the Guidelines. Please note that while Section 28 of the Planning Act has since been repealed, the Guidelines are still in force under Section 27(1) of the Planning and Development Act 2024, as amended ('the New Planning Act') and are considered National Planning Policy Guidance under Section 27(2) of the New Planning Act. Due to the timelines associated with the planning process for renewable energy projects and the commitment within the Climate Action Plan 2025 to publish revised wind energy development guidelines for onshore wind by Q1 2025, it is possible that the Draft Guidelines will be adopted during the consideration period for the Proposed Project.

The constraints mapping process involves the placing of buffers around different types of constraints so as to clearly identify the areas within which no development works will take place. The size of the buffer zone for each constraint has been assigned either using guidance presented in the Draft Guidelines which is more onerous than the buffer zones as detailed in the current Guidelines or based on industry best practice.

The constraints map for the Site, as shown in Figure 5-2 below, was produced following a desk study of all site constraints. Figure 5-2 encompasses the following constraints and associated buffers:

- **Sensitive Receptors:** a minimum 740-metre setback from third party sensitive receptors (achieving the 4 x tip height separation distance from third party sensitive receptors in line with the Draft Guidelines);
- **Telecommunications:** Setback buffers determined following detailed assessment of telecommunication links that traverse the Proposed Wind Farm site boundary.
- **Designated Sites/Natura 2000:** a minimum 100-metre setback of the Proposed Project infrastructure from Special Areas of Conservation, Special Protected Areas and Proposed Natural Heritage Areas;
- **Hydrology:** Watercourses plus 50m buffer;
- **Archaeology:** Archaeological Sites or Monuments: 50-metre buffer, plus 'Zone of Notification' as required by the National Monuments Service (ROI). Recorded Monuments plus 50m buffer;
- **Transport:** Draft Guidelines setback from National and Regional roads and railways of a distance equal to turbine tip height plus 10% (i.e., 203.5m). To note, for the purposes of identifying the greatest setback buffer from national and regional roads and railway, a tip height of 185m has been utilised;

Facilitators at the Proposed Wind Farm refer to those aspects which build on the existing advantages and include the following:

- Available lands for development;
- Acceptable wind resource;
- Opportunity to win construction materials on site, minimising the potential for additional traffic (and associated environmental impacts) and cost generation by acquiring all materials offsite;
- Existing access points and general accessibility of all areas of the Proposed Wind Farm site due to existing road infrastructure; and

[2] https://windenergyireland.com/images/files/9660bdfb5a4f1d276f41ac9ab54e991bb600b7.pdf

- Limited extent of constraints.

The inclusion of the constraints on a map of the study area allows for a viable area to be identified. An initial wind farm layout was then developed to take account of all the constraints mentioned above and their associated buffer zones and the separation distances required. Following the mapping of all known constraints, detailed site investigations were carried out, see Section 4.3.1.1.2 of Chapter 4 of the EIAR for detail on site investigative works completed to date.

The ecological assessment of the Proposed Wind Farm encompassed habitat mapping and extensive surveying of birds, bats and other fauna. This assessment, as described in Chapter 6 and 7 of the EIAR on Biodiversity and Ornithology, optimised the decision on the siting of turbines and the carrying out of any development works, such as the construction of roads.

The hydrological and geotechnical investigations at the Proposed Wind Farm examined the proposed locations for turbines, roads and other components of the Proposed Project, such as the Proposed Grid Connection infrastructure. Where specific areas were deemed as being unsuitable for the siting of turbines or roads, etc., alternative locations were proposed and assessed, taking into account the areas that were already ruled out by constraints. In other specific areas, infrastructure elements under consideration were omitted from the final Proposed Wind Farm layout to eliminate the potential for significant environmental impacts within the Balief Zone of Contribution.

Archaeological investigations, comprising a desktop study and detailed field surveys, identified all recorded National Monuments and Recorded Monuments within the vicinity of, and within, the Proposed Wind Farm site. Key constraints and appropriate buffer distances were established to inform both the landscape and visual assessment and the design evolution of the Proposed Project. Please see Chapter 13 Landscape and Visual Impact Assessment (LVIA) and 14 Cultural Heritage of the EIAR for further details.

The turbine layout for the Proposed Wind Farm has also been informed by wind data, the results of noise assessments, shadow flicker and the separation distance to be maintained between turbines. Thus, the baseline environmental assessment of the Proposed Wind Farm site and wind farm design was an iterative process, where findings at each stage of the assessment were used to further refine the design, always with the intention of minimising the potential for environmental impacts.

As the Proposed Wind Farm design was refined, the biodiversity and ornithology mitigation and enhancement measures, detailed in the BEMP included as Appendix 6-4 of the EIAR, for the Proposed Project were also refined through an iterative design process. This process is outlined in Section 3.2.5.2.2 of Chapter 3 of the EIAR. Please refer to the constraints and facilitators map in Figure 5-2 below.

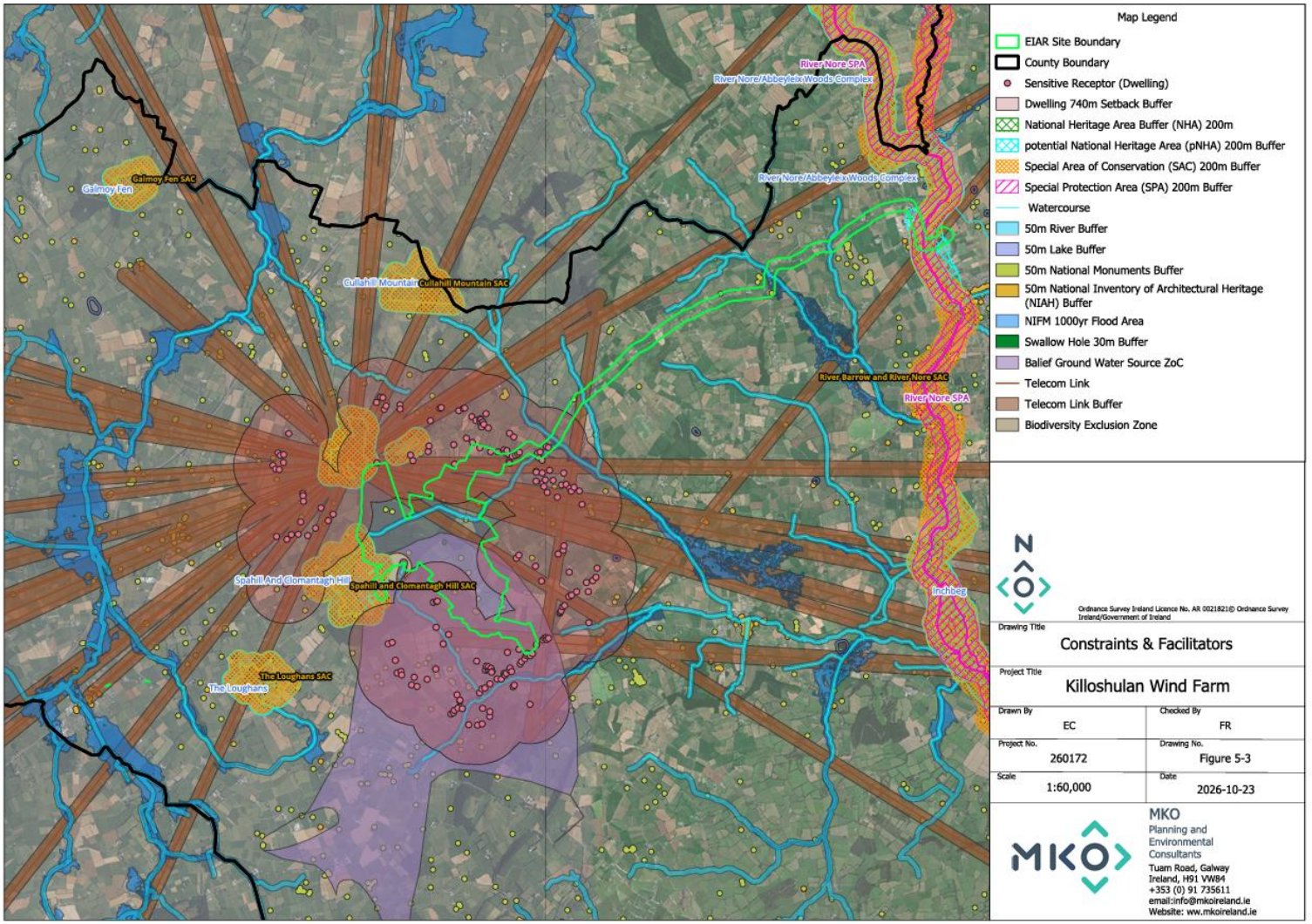


Figure 5-2 Constraints and Facilitators Map

5.2.3 Proposed Wind Farm Design Process

The final design of the Proposed Wind Farm takes account of all identified constraints and the distances that is to be maintained between turbines and the constraints such as houses, roads, etc. The layout is based on the results of all site investigations that have been carried out during the EIAR process and the EIA scoping process with statutory and non-statutory consultees. As information regarding the Proposed Project was compiled and assessed, the number of turbines and the proposed layout have been revised and amended to take account of the physical constraints of the Proposed Wind Farm and the requirement for buffer zones and other areas which should be avoided. The selection of the number of turbines and layout has also had regard to wind-take and the separation distance to be maintained between turbines, as well as landscape and visual, cultural heritage, noise and shadow flicker elements. The EIAR and Proposed Project design process was an iterative process, where findings at each stage of the assessment were used to further refine the design, always with the intention of minimising the potential for environmental impacts.

The development of the final Proposed Wind Farm layout has evolved following feedback from the various studies and assessments carried out as well as ongoing negotiations and discussions with landowners, the local community, and statutory consultees.

There were a number of reviews by the wind farm design team of the specific locations of turbines during the optimisation of the Proposed Wind Farm site layout. The initial constraints study identified a significant viable area within the overall study area of the Proposed Wind Farm site. Please refer to Figure 3-2, Figure 3-3 and Figure 3-4 in Chapter 3 of the EIAR to see the evolution of the turbine layout for the Proposed Wind Farm.

Further details of the design process and a selection of design iterations can be found in Chapter 3, Section 3.2.5 of the EIAR.

5.2.4 Proposed Grid Connection Design Process

Proposed 110kV Substation

The Proposed 110kV Substation is located in the north of the Proposed Wind Farm site and is sited within an agricultural grassland field. This grassland is of low ecological value. Given its location relative to the proposed turbines, the Proposed 110kV Substation is in a suitable position for the collection of the internal electrical cabling from the turbines. The Proposed 110kV Substation is located an appropriate distance from the nearest proposed turbine (twice the 185m Tip Height)[3] and is located close to the public road network along which the Proposed 110kV Underground Cabling will run for approximately 12.6km.

This location was deemed to be suitable due to the habitats it is located on, its position within the overall Proposed Wind Farm site and relative to the public road network.

The footprint of the Proposed 110kV Substation compound measures approximately 23,665 m^2 in area and will include 2 no. control buildings and the electrical substation components necessary to consolidate the electrical energy generated by each wind turbine and export that electricity from the Proposed 110kV Substation to the national grid.

Site Selection

Following determination of the Proposed 110kV Underground Cabling route, potential locations for the Proposed 110kV Substation were considered, having regard to landscape and visual sensitivity, proximity to residential receptors, and review of all potential environmental constraints.

[3] https://www.eirgrid.ie/sites/default/files/publications/6-110-220-400-kV-Substation-General-Requirements.pdf

Of the locations considered, the northern portion of the Proposed Wind Farm was identified as the most suitable location for the Proposed 110kV Substation.

Constraints

The siting of the Proposed 110kV Substation infrastructure was determined through the application of known environmental constraints, informed by detailed ecological, ornithological, and landscape and visual surveys, together with the Proposed 110kV Underground Cabling route feasibility assessment described above.

The Proposed 110kV Substation is sited within agricultural fields currently in use as grazing pasture. This is considered to be a working agricultural landscape that has been extensively modified through agricultural activity, is not subject to any landscape designation, and is not considered to be of particular scenic or aesthetic value. A small number of residential properties are located to the north of the Proposed 110kV Substation.

It was determined that the location of the Proposed 110kV Substation will achieve appropriate separation distances from sensitive receptors while remaining suitably positioned to connect the Proposed Wind Farm to the national grid.

It is noted that, while the operational lifespan of the Proposed Wind Farm is expected to be 35 years (following which the Proposed Turbines may be repowered or decommissioned), the Proposed 110kV Substation, the Proposed 110kV Underground Cabling route and all the associated transmission infrastructure i.e. underground cables, etc will form part of the national grid infrastructure.

Proposed 110kV Underground Cabling Route

The Proposed Wind Farm will connect to the national grid via underground electrical cabling, located primarily within the public road corridor, with some small sections passing through private agricultural land. Underground electrical cables will transmit the power output from each wind turbine to the Proposed 110kV Substation, and from there to the existing Ballyragget 110kV substation, via an underground electrical cabling route, measuring approximately 12.6km in length.

A key consideration in determining the grid connection method for a proposed wind energy development is whether the cabling is underground or run as an overhead line (OHL). An alternative to the approximately 12.6km Proposed 110kV Underground Cabling would be to construct an OHL from the Proposed 110kV Substation to the existing 110kV Ballyragget Substation following a similar route to that of the Proposed 110kV underground cabling route. While OHL are less expensive and allow for easier repairs when required, underground cabling will have no visual impact. For this reason, it was considered that underground cabling would be a preferable alternative to overhead lines. The Guidelines also indicate that underground cables are the preferred option for connection of a wind energy development to the national grid. The Proposed 110kV underground cabling will follow the route of existing public road insofar as possible in order to minimise the amount of ground disturbance required.

An entirely off-road grid connection route alternative was considered at an early stage of the design process, however, this was discounted due to requirement to construct significant lengths of access and maintenance tracks to access joint bays along the route, increasing the potential for environmental effects compared to a route that predominantly follows existing roads. In addition, the requirement for a significant number of landowner agreements along the length of the route would have significantly increased the time required to confirm the final proposed, design of the Proposed Project and driven up the overall costs associated with the project.

Existing substations located within 20km of the Proposed Wind Farm site were considered, 3 no. existing electricity substation were assessed for the Proposed Wind Farm to connect to the national grid, the electricity substations included:

- Ballyragget 110kV Substation
- Thurles 110kV Substation
- Tirlán facility 38kV Substation

The Proposed 110kV underground cabling route to Ballyragget 110kV substation and the proposed underground electrical cabling route has been revised and refined to take account of the findings of the site investigations and baseline assessments, which have informed the Proposed Grid Connection design as presented in Figure 3-6. The alternative options considered are shown Figures 3-7 to Figure 3-10 of Chapter 3 of the EIAR.

Further details of the design process and a selection of design iterations can be found in Chapter 3, Section 3.2.5 of the EIAR.

6. LEGISLATIVE CONTEXT

6.1 Planning and Development Act 2000 (as amended)

6.1.1 Strategic Development Infrastructure Planning Application

This SID planning application for the Proposed Development is being made pursuant to Section 37E of the Planning Act. Section 37E provides the statutory framework for the assessment of applications for SID which, by reason of their nature and scale, are of strategic economic or social importance to the State or the region concerned. The threshold for SID infrastructure is established in the 7th Schedule of the Planning Act. The relevant threshold established in the 7th Schedule for the Proposed Project provided below:

> *"An installation for the harnessing of wind power for energy production (a wind farm) with more than 25 turbines or having a total power output greater than 50MW".*

Along with meeting the threshold established in the 7th Schedule, one or more of the following criteria, set out under Section 37A(2) of the Planning Act, must be satisfied.

i. *be of strategic economic or social importance to the State or the region in which it would be situate,*
ii. *contribute substantially to the fulfilment of any of the objectives of the National Planning Framework or of any regional spatial and economic strategy, or*
iii. *have a significant effect on the area of more than one planning authority,*

The Proposed Project exceeds the 7th Schedule threshold and meets criteria set out under Section 37A(2) of the Planning Act.

In accordance with Section 37B of the Planning Act, the Applicant engaged in pre-application consultations with the Commission in order to determine whether the Proposed Project constituted SID. Following pre-application consultation with the Commission in relation to Proposed Project, the Commission formed the opinion, under Section 37A(2)(a) and (2)(b), that the Proposed Project does fall within the definition of SID within the meaning of the Planning Act. The Commission served notice of their opinion under Section 37B(4)(a) in an SID Determination Letter dated the 9th of October 2026.

Accordingly, pursuant to Section 37E of the Planning Act, the SID planning application for permission for the Proposed Development is being made directly to the Commission.

6.1.2 Ministerial directions regarding development plans

As further detailed in Section 7.2.1 below, 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 (OPR) under Section 31AM(8) of the Act notified KCC of his intention to issue a Direction to the KCCDP enclosing a draft direction outlining the measures required to be taken by the planning authority in order to ensure that the plan is in compliance with the requirements of the 2000 Act and sets out an overall strategy for the proper planning and sustainable development of the area (hereafter 'the Draft Ministerial Direction').

Section 31(6)(a) of the 2000 Act provides that where a part of a plan is referred to in such a notice then that part of the plan shall not have effect, it states:

"Notwithstanding section 12(17), 13(11) or 20(4A), a plan shall not have effect in accordance with those sections in relation to a matter contained in the plan which is referred to in a notice under subsection (3)."

Section 31(6)(b) of the 2000 Act provides that where a part of a plan is referred to in such a notice then the corresponding provision(s) in the previous plan shall not cease to have effect, it states:

'If a part of a plan proposed to be replaced under section 12, 13 or 20 contains a matter that corresponds to any matter contained in that plan which is referred to in a notice under subsection (3), that part shall not, save where subsection (17) applies, cease to have effect in respect of that matter.'

This matter is detailed further in the context of the KCCDP subject to the Draft Ministerial Direction as it applies to the Proposed Development in Sections 7.2.1 - 7.2.3 below.

6.1.3 Renewable Energy Directive III

On the 6th of August 2025, the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. No. 274 of 2025) were adopted for the purpose of giving effect to Articles 15e(5), 16, 16b, 16c(2), 16d, 16e and 16f of RED III.

The legislation introduces new decision timelines (ss.34E, 37JB, 295B): 52 weeks for new wind farms, 30 weeks for repowering projects, and one to two years for IROPI cases (two years for projects over 150 kW, one year for projects under 150 kW or repowering). Importantly, renewable energy developments, including related grid and storage infrastructure, are now presumed to be in the overriding public interest.

Appendix 1 of the Cover Letter included with this application includes a table demonstrating compliance with the '*schedule of information to inform the completeness check*' as appended by the Commission to the SID Determination. An additional 'Note' column has been added to provide additional context to the Commission. It is the Applicant's view that the planning application satisfies the completeness check.

6.1.4 Requirement for Environmental Impact Assessment Report

The EIA Directive 2011/92/EU, as amended (the 'EIA Directive'), has been incorporated into Irish law primarily through the Planning Act and the Planning and Development Regulations 2001, as amended ('the Regulations').

Part 2 of Schedule 5 of the Regulations identifies classes and scales of development that require EIA. The relevant class of development in this case relates to "*installations for the harnessing of wind power for energy production (wind farms) with more than 5 turbines or having a total output greater than 5 megawatts*", as per Item 3(i) of the Schedule. The Proposed Project exceeds 5 Megawatts in scale and proposes more than 5 turbines and therefore is subject to EIA. As such, the application for the Proposed Development is accompanied by an EIAR.

6.1.5 Requirement for Appropriate Assessment / Natura Impact Statement

Article 6(3) of the Habitats Directive sets out the requirement for an Appropriate Assessment (AA) of any plan or project that is not directly related to the management of a protected site but is likely to have a significant effect on it. This assessment evaluates the potential implications for the site in light of its conservation objectives. Competent authorities are mandated to grant development consent only if it is ascertained that a proposed project will not adversely affect the integrity of the site concerned or if it will, if there are imperative reasons of overriding public interest why it should proceed, and the relevant criteria is met.

Under Section 177U of the Planning Act, the legal requirements pertaining to AA set out in Part XAB of the Planning Act, apply to this application for development permission under Section 37E. This application is therefore accompanied by an AA Screening Report and an NIS.

6.1.6 The Planning and Development Act 2024

The Planning and Development Act 2024 ('the New Planning Act') was signed into law by the President on the 17th of October 2024, after passing in both Houses of the Oireachtas. At the time of lodgement of this SID planning application, the Planning and Development Act 2000, as amended remains in place until such time as the New Planning Act is commenced by Ministerial Orders, with the Government indicating that this will be done on a phased basis.

Should the consenting provisions of the New Planning Act commence while this application is being decided, it is noted that, upon repeal of the Planning Act, a grant of permission under Section 37G of the Planning Act will be deemed to be a permission granted under Section 123 of the New Planning Act.

6.2 Climate and Renewable Energy Legislation

6.2.1 European Legislation

The Renewable Energy Directive (RED) is the EU's legal framework for the development of renewable energy across all sectors of the EU economy, supporting clean energy cooperation across EU countries. Since its adoption in 2009, the RED has evolved through three major iterations-RED I (2009), RED II (2018), and RED III (2023)- each raising ambition to support decarbonisation and energy security.

Under RED I, Member States were legally required to meet a 20% share of renewables in final energy consumption by 2020. RED II increased this target to 32% by 2030. Most recently, RED III, which entered into force in November 2023, raised the target further to 42.5% by 2030, with an indicative ambition of 45%, in line with the REPowerEU Plan.

In order to ensure that the RED III target of 42.5% is achieved, EU Member States must notify their climate and energy objectives, targets, policies, and measures to the European Commission and were established under Regulation (EU) 2018/1999 of the European Parliament and of the Council on the Governance of the Energy Union and Climate Action ('the Governance Regulation')[4]. The Department of the Environment, Climate and Communications (DECC) submitted an updated National Energy and Climate Plan (NECP) 2021-2030 to the European Commission in July 2024. The updated NECP committed to achieving a 43% share of renewable energy in total energy consumption by 2030. In the trajectories set out in the updated NECP, it states that Ireland's proposed trajectory will not be in line with the desired trajectory set out in the Governance Regulation.

Given that, of 27 EU member states, Ireland had one of the lowest proportions of renewable energy at 16% in 2024[5], the implementation of RED III represents both a legal obligation and an opportunity to remove procedural bottlenecks that hinder critical infrastructure, such as the Proposed Project.

Regulation (EU) 2026/667 of the European Parliament and the Council was adopted on the 11th of March 2026. The Regulation amends Regulation (EU) 2021/1119 with regard to the setting of an EU intermediate climate target for 2040.

Considering the scientific advice of the European Scientific Board on Climate Change and a detailed impact assessment, the Regulation sets a legally binding intermediate climate target of a 90% reduction in greenhouse gas emissions by 2040, compared to 1990 levels.

[4] *Regulation (EU) 2018/1999 of the European Parliament and of the Council on the Governance of the Energy Union and Climate Action, available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32018R1999*
[5] *https://ec.europa.eu/eurostat/statistics-explained/index.php?title=File:Renewable_energy_2024_infographic.jpg*

The Regulation supports the European Climate Law's objective of climate neutrality by 2050. The Proposed Project by generating and providing renewable energy to the national electricity grid, will support the decarbonisation of the electricity sector, which will support the decarbonisation of other sectors. The Proposed Project by reducing reliance on greenhouse gas emitting fossil fuels will support the achievement of a 90% reduction in greenhouse gas emissions by 2040 (relative to 1990 levels) and climate neutrality by 2050.

6.2.2 National Legislation

Climate Action and Low Carbon Development Act 2015 (as amended)

The Climate Action and Low Carbon Development Act 2015, as amended ('the Climate Act') establishes a legislative imperative to reduce Ireland's carbon emissions. The Climate Act legally binds Ireland to achieve net-zero emissions no later than 2050, and to a 51% reduction in emissions by the end of this decade.

The Climate Act also incorporates the following key provisions:

- Embeds the process of setting binding and ambitious emissions-reductions targets in law;
- Provides for a national climate objective, which commits to pursue and achieve no later than 2050, the transition to a climate resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy;
- Provides that the first two five-year carbon budgets proposed by the Climate Change Advisory Council should equate to a total reduction of 51% over the period to 2030, relative to a baseline of 2018;
- The role of the Climate Change Advisory Council has been strengthened;
- The government must adopt carbon budgets that are consistent with the Paris agreement and other international obligations;
- Actions for each sector will be detailed in the Climate Action Plan which must be updated annually; and
- Local Authorities must prepare individual Climate Action Plans which will include both mitigation and adaptation measures and will be updated every five years.

Section 15(1) below places an obligation on public bodies to exercise their functions in favour of climate concerns when making decisions, unless it is objectively impracticable to do so.

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

The implications for public bodies in exercising their functions in accordance with Section 15 of the Climate Act has been scrutinised by the Irish legal system. The Supreme Court judgment on 4th February 2026 (Coolglass Wind Farm Limited v An Coimisiún Pleanála [2026] IESC 5) confirmed that consenting authorities must make decisions in a manner 'consistent with' the approved national long term climate action strategy, 'in so far as is practicable'. This means that departure from climate objectives is permissible but only where there are genuine practical difficulties that make full alignment impracticable.

Consenting Authorities, in making a decision on this application, must meaningfully engage with national climate objectives when exercising their decision-making functions. Consenting Authorities, must also ensure that their decision on an application falls within a spectrum of outcomes which can be considered to be consistent with, in so far as practicable, national climate objectives.

7. PLANNING POLICY CONTEXT

This section of the Planning Report provides a summary of the planning, renewable energy and climate policy context relevant to the Proposed Project. A more detailed and comprehensive breakdown of planning policy at all levels is set out in Chapter 2 of the EIAR.

It is clear from the policies outlined below that the Proposed Project is strongly supported in principle by policy at all levels. The following section contains a synopsis of the current policies in place and their relevance to the Proposed Project.

The Proposed Project sits within a policy framework characterised by several recent crises, which have significantly influenced policy changes in recent years. These crises have heightened the imperative for Ireland to transition towards a renewable energy-focused electricity grid and have emphasised the necessity for diversifying its energy sources.

7.1 International, European, National and Regional Policy

7.1.1 International Policy

Paris Agreement

On an international level, Ireland is a signatory of the Paris Agreement, a global initiative adopted in 2015 that aims to address climate change by limiting global warming to well below 2 degrees Celsius above pre-industrial levels, with efforts to limit the increase to 1.5 degrees Celsius. Under the Paris Agreement, countries submit Nationally Determined Contributions (NDCs), outlining their individual climate action plans and commitments. Ireland's contribution comes under the European Union's (EU) NDCs targets and is based on the European Union's 2030 emissions reductions targets.

7.1.2 European Policy

European Green Deal

On a European level, the European Green Deal, initially introduced by the European Commission in December 2019, sets out the 'blueprint' for a transformational change of the 27-country bloc from a high- to a low-carbon economy. The European Green Deal is intended to work through a framework of regulation and legislation setting clear overarching targets, e.g. a bloc-wide goal of net zero carbon emissions by 2050 and a 55% cut in emissions by 2030 (compared with 1990 levels). This is a substantial increase compared to the existing target, upwards from the previous target of at least 40% (2030 Climate & Energy Framework), and furthermore, these targets demonstrate the ambition necessary to keep the global temperature increase to well below 2°C and pursue efforts to keep it to 1.5°C as per the Paris Agreement.

The EU Fit for 55

The EU Fit for 55 package was published in late 2021 with the aim of reducing EU emissions by at least 55% by 2030 compared to 1990 levels and making the EU carbon-neutral by 2050. This EU package is a set of proposals to revise all existing EU acts on climate and energy and increase the EU target for renewables in the overall energy mix from 32% in 2030 to 40%.

Renewable Energy Directive & REPowerEU

In November 2023, a revision of the Renewable Energy Directive[6] ('RED III'), came into force. RED III increases the EU wide renewable energy target from 32% set under the previous revision of the directive to at 42.5%, with an ambition to reach 45% by 2030. This increase comes following the Russian invasion of Ukraine and the publication of REPowerEU plan in May 2022. REPowerEU aims to make Europe independent from Russian fossil fuels including oil and gas by rapidly transitioning to renewable energy. The plan aims to accelerate the scale up of renewables by speeding up the permitting process and placing renewable energy developments in the category of overriding public interest. Notwithstanding that REPowerEU specifically relates to making Europe independent from fossil fuels imported from Russia, the provision of indigenous renewable energy developments such as the Proposed Project, will reduce Ireland's vulnerability to price fluctuations and geopolitical risks associated with the importation of fossil fuels.

AccelerateEU

AccelerateEU was published by the European Commission in April 2026. AccelerateEU addressed the EU's rising energy costs and the acceleration of the renewable energy transition to strengthen energy resilience.

AccelerateEU sets out five pillars which set out the key areas of action of the plan, they are as follows:

1. *Closer EU coordination,*
2. *Protecting consumers and businesses,*
3. *More homegrown clean energy,*
4. *Stepping up our energy system, and*
5. *Boosting investments.*

The two pillars relevant to the Proposed Project relate to increasing indigenous renewable energy and improving our energy system. The Proposed Project which is an indigenous renewable wind energy development with an onsite 110kV substation that will produce and increase Irelands renewable energy capacity and will provide a new substation which will connect to the national electricity grid.

7.1.3 National Policy

Climate Action Plan 2025

Climate Action Plan 2025 ('CAP25') represents the third statutory update to Ireland's climate roadmap under the Climate Act. Building on the foundations laid by previous plans, CAP25 refines and strengthens the strategies necessary to deliver Ireland's legally binding carbon budgets and sectoral emissions ceilings. It sets out a clear trajectory to reduce greenhouse gas emissions by 51% by 2030 and to achieve climate neutrality no later than 2050.

A cornerstone of CAP25 is the decarbonisation of Ireland's electricity system through a substantial increase in renewable energy generation. The plan reaffirms ambitious targets for renewable electricity share which includes 80% by 2030, and 50% by 2025. This is to be achieved through the accelerated deployment of onshore wind (2 GW by 2025; 9 GW by 2030), offshore wind (8 GW by 2030), and solar energy (up to 5 GW by 2025; 8 GW by 2030).

National Development Plan 2021 – 2030

The National Development Plan 2021 – 2030 ('NDP') sets out the major public investment projects identified by Government which are to play a significant role in addressing the opportunities and challenges faced by Ireland over the coming years such as housing, health, population growth, and most

[6] *Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (recast)*

relevant to the subject development, climate change. It is stated that the NDP will be the *'largest and greenest ever delivered in Ireland'*, and in this regard, the NDP highlights that extensive consultation was undertaken to ensure that the plan adequately supports the implementation of climate action measures.

One of the NDP's strategic climate priorities is the need for low-carbon, resilient electricity systems; specifically, the plan commits to increasing the share of renewable electricity up to 80% by 2030. This is characterised by the NDP as an '*unprecedented commitment to the decarbonisation of electricity supplies'*, which is certainly an ambitious and an explicit driver for the deployment of new renewable generators such as the Proposed Wind Farm. The focus of investment in renewable energy infrastructure is to contribute to a long-term, sustainable and competitive energy future for Ireland.

The National Development Plan Review 2025 ('NDP Review') sets out a comprehensive capital investment framework for the period 2026-2035, totalling €275.4 billion. Within this framework wind energy is recognised as a key enabler of the State's legally binding commitment to reduce greenhouse gas emissions by 51% by 2030, including a 75% reduction in emissions from the electricity sector. To support the expansion of renewable electricity generation, the Government has allocated €3.5 billion in equity funding to ESB Networks and EirGrid to enhance grid transmission and distribution infrastructure, which will directly facilitate increased integration of wind energy developments such as the Proposed Project.

National Planning Framework First Revision (2025)

On 8th April 2025, the Government approved the National Planning Framework First Revision ('Revised NPF') which was subsequently passed through both Houses of the Oireachtas. The Revised NPF aims to address changes that have occurred in Ireland since 2018.

The Revised NPF provides an updated projection for the population of Ireland, with the population expected to increase to 6.1 million by 2040. This population growth will place further demand on both the built and natural environment, and subsequently, the services required to meet said demands. **National Strategic Outcome 8** to Transition to a Carbon Neutral and Climate Resilient Society remains unchanged.

Regional Renewable Energy Capacity Allocations have been introduced under the Revised NPF. This was one of the key actions for CAP24 and is supported under CAP25. The Southern region, in which the Proposed Project is located, is allocated a target of installing an **additional 978 MW of onshore wind energy, by 2030.**

Under **NPO 74** Regional Assemblies are required to plan for the delivery of the regional renewable electricity capacity allocations outlined in the Revised NPF and identify allocations for each of the local authorities within their RSES. Furthermore, **NPO 75** requires Local Authorities to plan for the delivery of Target Power Capacity (MW) allocations consistent with the relevant RSES, through their City and County Development Plans. At the time of writing, no local Target Power Capacity allocations have been established, however it is clear from the regional allocation that the Southern region is set to deliver a significant amount of onshore wind energy in the coming years.

For the Southern Region in particular, the Revised NPF states the priority of '*Harnessing the potential of the region in renewable energy terms in accordance with the capacity allocation targets set out in Chapter 9: Climate Transition and Our Environment, across the technological spectrum from wind and solar, in addition to biomass and wave energy'*.

The introduction of renewable energy targets represents a more active and prescriptive approach to land use planning for renewable energy development. The Revised NPF aligns the national target of 9GW of onshore wind energy with the policies and objectives of Local Authorities. Regarding this, it is clear that the provision of new renewable energy generation through the Proposed Project is in line with aims and objectives of the Revised NPF, which seeks to transition to a carbon neutral economy.

National Energy Security Framework

The National Energy Security Framework ('NESF'), adopted in 2022, and implements many of the aims and objectives of REPowerEU on a national level, reinforcing the State's requirement to urgently diversify

away from imported fossil fuels and accelerate the roll out of renewables. The NESF is supported by the recently published Energy Security Package 'Energy Security in Ireland to 2030'. The Energy Security Package provides further long-term energy security measures which includes the prioritisation of achieving a renewables-led energy system.

Programme for Government – Securing's Ireland's Future (January 2025)

The Programme for Government 2025 – Securing Ireland's Future (January 2025) places specific emphasis on climate change, recognising that time is critical in addressing the climate crisis. The Programme states that the Government is committed to taking *"decisive action to radically reduce our reliance on fossil fuels and to achieve a 51% reduction in emissions from 2018 to 2030, and to achieving net-zero emissions no later than 2050".*

The Programme states that the next ten years are a critical period in addressing the climate crisis, and therefore, a deliberate and swift approach to reducing more than half of Ireland's carbon emissions over the course of the decade (2020-2030) must be implemented. The programme states that the Government are committed to reducing Greenhouse Gas emissions by an average 7% per annum over the next decade in a push to achieve a net zero emissions by the year 2050.

Regarding renewable energy generation, the Programme notes that the Government is committed to the rapid decarbonisation of the energy sector. The Programme states the Government's ongoing support and commitment to take "*the necessary action to deliver at least 70% renewable electricity by 2030"*. This target has been updated by subsequent Climate Action Plans.

Wind Energy Development Guidelines 2006

In June 2006, the then Department of Environment, Heritage and Local Government ('DoEHLG') published the Guidelines under Section 28 of the Planning Act. The aim of the Guidelines was to assist the proper planning of wind power projects in appropriate locations around Ireland. The Guidelines also highlight general considerations in the assessment of all planning applications for wind energy. They set out advice to planning authorities on planning for wind energy through the development plan process and in determining applications for planning permission. They contain guidelines to ensure consistency of approach throughout the country in the identification of suitable locations for wind energy development.

Draft Wind Energy Development Guidelines 2019

The Department of Housing, Planning and Local Government ('DoHPLG') published the Draft Guidelines in December 2019. A consultation process in relation to the Draft Guidelines concluded on the 19th of February 2020. A further review of the Draft Guidelines is currently underway by the Department of Housing, Local Government and Heritage ('DoHLGH') and the Department of Environment, Climate and Communications ('DoECC'), particularly in relation to noise limits. Since the publication of the Draft Guidelines there have been significant changes in national policy regarding renewable energy targets, giving further impetus to the importance of the further review. The Draft Guidelines set out that that the proper planning and sustainable development of areas and regions must be considered when local authorities prepare their development plans and assess planning applications, irrespective of the significant role renewable energy has to play in tackling climate change.

7.1.4 Regional Policy Context

Southern Regional Assembly Regional Spatial & Economic Strategy for the Southern Region 2020-2032

The Southern Regional Assembly ('SRA') was established in 2015, the Regional Spatial and Economic Strategy ('RSES') for the Southern Region (Carlow, Clare, Cork, Kerry, Kilkenny, Limerick, Tipperary, Waterford and Wexford) came into effect on 31st January 2020. The RSES provides a long-term, strategic development framework for the future physical, economic and social development of the Southern

Region. The RSES seeks to achieve balanced regional development and full implementation of Project Ireland 2040 – the National Planning Framework.

Adopted on the 31st of January 2020, the principal statutory purpose of the RSES is to support the implementation of the Project Ireland 2040 NPF and NDP and the economic policies and objectives of the Government. The RSES aims to build on the region's strengths and potential to become a more prosperous, sustainable, climate resilient and attractive region for the benefit of all its people up to 2040 and beyond.

The RSES notes that planning policy and objectives must incorporate resilience and adaptability to ensure that the Region are agile and responsive to change. At present, Irish per capita greenhouse gas emissions are among the highest in Europe and the Government has identified '*Climate Change as the most important long-term challenge facing Ireland'* with a stated commitment to *'the transformation required to achieve a low carbon resilient future'*. Transition to a low carbon energy future will require a wide range of policy responses across industry and public sectors, including electricity.

To achieve national and EU targets in the context of the electricity sector, the RSES notes that further investment is required to develop alternative renewable energies with greater interconnection to energy resources. This key enabling action is captured under Strategic Aim 8 which sets out the need to "*safeguard and enhance the environment through sustainable development, prioritising action on climate change across the region, driving the transition to a low carbon and climate resilient society*."

The RSES is ultimately supportive of the future growth of renewable energy technology e.g. the Proposed Project in the region and sets a clear precedent to identify and capitalise on those opportunities associated with the transition to renewable energy generation.

It should be noted that at the time of writing of this Planning Report, the SRA has commenced their review of the RSES. The current SRA RSES remains the relevant regional spatial and economic strategy for the Southern Region at the time of submission.

Table 7-1 below sets out the compliance of the Proposed Project against relevant policy at the international, European, national and regional level.

Table 7-1 International, European, National and Regional Policy Objective and Compliance Summary Table

Policy Document	Targets / Objectives	Compliance
Paris Agreement	Limit global warming to well below 2 degrees Celsius above pre-industrial levels, with efforts to limit the increase to 1.5 degrees Celsius.	The Proposed Project will generate clean, renewable and sustainable wind energy which will reduce reliance on greenhouse gas emitting fossil fuels for energy generation. This will contribute to limiting global warming.
Renewable Energy Directive	42.5% renewable energy by 2030, aiming for 45%.	The Proposed Project will increase Ireland's renewable energy share, contributing towards Ireland's climate and energy obligations under EU law.
REPowerEU	Accelerate the roll-out of renewables. Increase the 2030 target for renewables from 40%-45%. Tackle slow and complex permitting for major renewable projects	Considering the urgency required under the REPowerEU, it is imperative that all suitable sites, such as the site of the Proposed Project, are developed as soon as possible, in accordance with proper planning and sustainable development.
European Green Deal	Increase renewable energy share Reduce greenhouse gas emissions Clean energy transition	The Proposed Project will generate and provide clean renewable onshore wind energy which will increase Ireland's renewable energy share, reduce reliance on greenhouse gas emitting fossil fuels for energy generation and will support the transition to a clean, renewables led energy system.
Climate Action Plan 2025	9GW of onshore wind by 2030, 6GW by 2025.	The Proposed Project will contribute directly towards the CAP25 goals of 9GW of wind energy by 2030. Onshore wind is identified as being critical in the decarbonisation of the electricity sector and as such the Proposed Wind Farm should be considered in that regard.
The National Planning Framework First Revision	National Strategic Outcome 8: Transition to a low carbon and climate resilient economy.	The Proposed Project is in line with the National Strategic Outcome 8 of the Revised NPF which seeks to transition to a low carbon and climate resilient economy. If permitted, the Proposed Project will

		contribute to the achievement of National Policy Objectives 70, 71, 73, 74 and 75.
National Development Plan 2021 - 2030	National Strategic Outcomes 8: Transition to a Climate-Neutral and Climate Resilient Society	The NDP is clear in its priority to reach a low-carbon, climate resilient society over the lifetime of the plan. The Proposed Project, if permitted, will provide clean, renewable electricity to the national grid, furthering development objectives of the NDP.
The National Energy & Climate Plan 2021 – 2030	Decarbonisation - Renewable energy Energy security	The Proposed Project will contribute to achieving key decarbonisation and energy security objectives by adding a new renewable electricity generator to the national grid.
National Energy Security Framework	Ensuring security of energy supply in the near-term; Reducing our dependency on imported fossil fuels in the context of the phasing out of Russian energy imports across the EU.	The Proposed Project will reduce the need for imported fossil fuels for electricity, improving national energy security.
Energy Security in Ireland to 2030 – Energy Security Package	Reduced and Responsive Demand. Renewables-Led System. More Resilient Systems. Robust Risk Governance.	The Proposed Project supports the objectives to ensure the State's energy security. The Proposed Project serves as a domestic renewable energy generator capable of providing clean electricity to the national electricity grid.
Wind Energy Guidelines	Acceptable noise thresholds and monitoring frameworks Visual amenity setback and spacing Control of shadow flicker Compliance with Community consultation and dividend requirements Consideration of the siting, route and design of the proposed grid connection as part of the whole project.	The Proposed Project complies with the requirements set out by the Guidelines, including noise, set back, shadow flicker, and community consultation guidelines. It is anticipated that the Proposed Project will be capable of adhering to the Draft Guidelines when finalised. The design of the Proposed Grid Connection was considered in Chapter 3 of the EIAR.
Southern Region – Regional Economic & Spatial Strategy	**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	The Proposed Project will generate clean and renewable wind energy, reducing reliance on greenhouse gas emitting fossil fuels for energy generation and supporting the region's transition to a low carbon, climate resilient and sustainable economy and society.

	business, public and residential sectors to achieve reduced GHG emissions in accordance with current and future national targets, improve energy efficiency and increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport and agriculture. **RPO 99 Renewable Wind Energy:** It is an objective to support the sustainable development of renewable wind energy (on shore and offshore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.	The Proposed Project which is a renewable energy development will align with national climate and renewable energy policy and targets as set out in the RSES.

7.2 Local Policy Context

7.2.1 Kilkenny City and County Development Plan 2021-2027

The Kilkenny City and County Development Plan 2021-2027 ('KCCDP') (as varied) came into effect on the 15th of October 2021. The KCCDP (as varied) incorporates the aims, objectives, policies and guidelines to provide for the proper planning and sustainable development of County Kilkenny. KCC have made 10 no. Variations to the KCCDP. However, it should be noted that the Variations do not relate to the climate and renewable energy policies or objectives within the KCCDP (as varied).

The KCCDP (as varied) is the statutory county development plan in effect for the County and provides the framework against which all planning applications for development in the county are assessed. The policies and objectives set out within the KCCDP (as varied) have maintained strong linkages with the key aims and themes set out within the previous development plan. Climate change is again emphasised as one of the greatest global challenges, with KCC acknowledging that continual action is needed for Kilkenny to become a low carbon and climate resilient county.

Draft Ministerial Direction

On the 15th of 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 ('OPR') under Section 31AM(8) of the 2000 Act notified KCC of his intention to issue a Direction to the KCCDP (as varied) stating as follows:

"In accordance with Section 31(4) 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;

*Chapter 11 Renewable Energy: **Section 11.4 Kilkenny Targets**, Section 11.5.1 Current status and targets and **Figure 11.4 Wind Strategy areas." (emphasis added)***

The enclosed Draft Ministerial Direction directs the Planning Authority to take the following steps with regard to the 'wind energy strategy' within the KCCDP:

"a. Reinstate sections 11.4 and 11.5.1 of the draft Development Plan, including the identification of 201 MW renewable energy to meet the objective for the generation of 100% of electricity needs from renewable sources for the county by 2030 consistent with the Climate Action Plan.

b. Amend the adopted wind energy strategy map (reference Figure 11.4) to ensure consistency with the renewable energy target at (a) above as follows:

> *i. Reinstate areas designated at Templeorum/Mullenbeg to 'acceptable in principle' in accordance with the 'draft wind energy strategy' of the draft Plan.*
>
> *ii. Reinstate areas designated at Castlebanny to 'acceptable in principle' in accordance with the 'draft wind energy strategy' of the draft Plan.*
>
> *iii. Reinstate the 3 no. smaller areas to the south of the county as 'acceptable in principle' in accordance with the 'draft wind energy strategy' of the draft Plan."*

The reason for the Draft Ministerial Direction is as follows:

1. *"The Development Plan as made is inconsistent with Ministerial Guidelines issued under Section 28 of the Act, specifically item 2 of the Specific Planning Policy Requirement contained in the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and*

Climate Change (July 2017), which sets out the requirement for the Planning Authority to comply with the aforementioned Specific Planning Policy Requirement under section 28(1C). In particular, the Development Plan fails to identify renewable energy targets (in megawatts) which Kilkenny can contribute in delivering its share of overall government targets on renewable energy and climate change mitigation over the plan period.

2. *The Development Plan contains conflicting objectives on renewable energy sustainable development and climate action such that the adopted Plan, without providing sufficient compensatory measures, significantly reduced the extent of the areas indicated as 'acceptable in principle' that were identified in the draft Development Plan as being necessary to achieve the* ***target of 201MW required to ensure that 100% of electricity demand for Kilkenny is met from renewable sources by 2030*** *and to ensure consistency with the Climate Action Plan.*
3. *The Development Plan has therefore not been made in a manner consistent with the recommendations of the Office of the Planning Regulator under Section 31 AM and fails to set out an overall strategy for the proper planning and sustainable development of the area."*

As the parts of the KCCDP (as varied) named above are taken not to have come in effect, **the Wind Strategy Areas** (as shown in Figure 11.4 of the KCCDP) and its associated policies cannot be taken into account. The Proposed Development has therefore been assessed in line with the relevant adopted policies of the KCCDP (as varied), and the extant provisions of the Kilkenny County Development Plan 2014-2020 (KCCDP 2014-2020) which remain in effect under Section 31(6)(b) of the 2000 Act as detailed in Section 7.2.3 below since there has been no conclusion the Minister's intervention in the KCCDP at time of writing.

Relevant Policies and Objectives

The KCCDP (as varied) provides for the development of indigenous energy resources, with an emphasis on renewable energy supplies. KCC acknowledges the importance of renewable energy in reducing anthropogenic greenhouse gas emissions and the contribution of renewable energy in achieving national and EU target net zero greenhouse gas emissions by 2050.

Climate change mitigation and adaptation objectives have been incorporated into the policies of the KCCDP (as varied). This is to ensure that climate change has been consistently integrated into the policy themes addressed by the KCCDP (as varied). The strategic aim for climate change as set out in Chapter 2 of the KCCDP (as varied) is as follows:

> *"Strategic Aim: To provide a policy framework with objectives and actions in this City and County Development Plan to facilitate the transition to a low carbon and climate resilient County with an emphasis on reduction in energy demand and greenhouse gas emissions, through a combination of effective mitigation and adaptation responses to climate change."*

The KCCDP (as varied) has aligned its policy and objectives with the Strategic Objectives of the NPF and the RSES to maintain and improve the County's attraction in order to maximise investment opportunities. The KCCDP (as varied) sets out a number of Strategic Objectives relating to Climate Action including the following:

- **2B** *To support the implementation of the National Climate Action Plan and the National Climate Action Charter for Local Authorities, and to facilitate measures which seek to reduce emissions of greenhouse gases by embedding appropriate policies within the Development Plan.*

- ***2C*** *To promote, support and direct effective climate action policies and objectives that seek to improve climate outcomes across the settlement areas and communities of County Kilkenny helping to successfully contribute and deliver on the obligations of the State to transition to low carbon and climate resilient society.*

- ***2E*** *To ensure that the Development Plan transposes, supports and implements strategic objectives of the National Planning Framework and the Southern Regional Spatial and Economic Strategy to create an enabling local development framework that: (a) promotes and integrates important climate considerations in local development and the assessment of planning applications and (b)*

supports the practical implementation of national climate policy and targets to assist in the delivery of the national transition objective.

- **2G** *To reduce energy related CO2 emissions of Kilkenny County Council.*
- ***2H*** *To achieve the commitment under the European Climate Alliance to the reduction of greenhouse gas emissions by 10 percent every 5 years.*
- ***11B*** To identify and designate a Decarbonation Zone (DZ) in the Council's Climate Action Plan for a spatial area in which a range of climate mitigation, adaptation and biodiversity measures are developed to address local low carbon energy, greenhouse gas emissions and climate needs to contribute to national climate action.

With regard to Renewable Energy, the KCCDP (as varied) acknowledges that Ireland and Kilkenny have excellent renewable energy resources, which will be a critical and growing component of Irish energy supply to 2020 and beyond. The strategic aim for renewable energy, set out in Chapter 11 of the KCCDP (as varied) sets a clear, ambitious target:

> *"Strategic Aim: To generate 100% of electricity demand for the County through renewables by 2030 by promoting and facilitating all forms of renewable energies and energy efficiency improvements in a sustainable manner as a response to climate change in suitable locations having due regard to natural and built heritage, biodiversity and residential amenities."*

The Renewable Energy chapter (Chapter 11) sets out the policy context for all renewables and includes an analysis of each type of renewable energy within the county, covering three aspects as follows:

- An analysis of the resource potential,
- An outline of development management guidance including potential impacts and
- Objectives and policies for their future development.

In this regard, it is an objective of the KCCDP (as varied) to:

> *"**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."*

KCCDP states that it is estimated that, by 2030, County Kilkenny will use 633 Gigawatt hours (Gwh) of electricity. If County Kilkenny is to reach its strategic aim of generating 100% of their electricity demand, they will need to install 253MW of energy or "*2.09% of the Country's 12.1 GW combined onshore and offshore renewable energy target*" . The Proposed Project will contribute towards achieving this important target by installing 62MW of installed capacity to the national electricity grid or almost 25% of the 253MW needed.

Table 7-2 below sets out the relevant policies and objectives within the KCCDP (as varied) which currently support the continued investment in renewable wind energy generation in County Kilkenny. A statement of consistency is included with regard to each relevant policy outlined. It is demonstrated through Table 7-2 that the Proposed Project is in compliance with the relevant policies and objectives of the KCCDP (as varied).

Development Management Guidance

Chapter 11 of the KCCDP (as varied) sets out the Development Management Guidance that the Planning Authority may consider when considering applications for wind energy development and grid development. The Proposed Project is assessed against each of the requirements as set out in Table 7-3 and Table 7-4 below.

Regarding wind energy Development Management Guidance, the KCCDP (as varied) states that "*all planning applications for wind energy developments shall be assessed against the DEHLG's Wind Energy Development Guidelines, 2006, (and any subsequent update of these guidelines) and the County Council's Wind Strategy*".

In the absence of the KCCDP (as varied)'s Wind Energy Strategy Areas and its associated policies due to the Draft Ministerial Direction, it is noted that the design and layout of the Proposed Wind Farm follows the recommendations and guidelines set out in the Guidelines published by the DEHLG in 2006, and the *'Best Practice Guidelines for the Irish Wind Energy Industry'* published by the Irish Wind Energy Association in 2012. The design and layout of the Proposed Wind Farm also has regard to the Draft Guidelines published by the DHPLG in 2019. Should the draft Guidelines be adopted in advance of a planning decision being made on Killoshulan Renewable Energy Development, the Proposed Wind Farm will be capable of achieving the requirements of the Draft Guidelines as currently proposed.

Table 7-2 KCCDP (as varied) Local Policy Objective and Compliance Summary Table

Policy Theme	Policy/ Objective	Compliance
Climate Action	**2B)** To support the implementation of the National Climate Action Plan and the National Climate Action Charter for Local Authorities, and to facilitate measures which seek to reduce emissions of greenhouse gases by embedding appropriate policies within the Development Plan.	The Proposed Project is in compliance with 2B as it directly contributes to the onshore wind energy target of 9GW as set out in CAP25. The Proposed Project will generate clean, renewable electricity, which will be integrated into the grid, helping to electrify and decarbonise other sectors, reducing the reliance on imported fossil fuels and as such reducing emissions of greenhouse gases. This will also aid in achieving the climate change and renewable energy objectives to reach national targets and transition to a low-carbon economy.
	2C) To promote, support and direct effective climate action policies and objectives that seek to improve climate outcomes across the settlement areas and communities of County Kilkenny helping to successfully contribute and deliver on the obligations of the State to transition to low carbon and climate resilient society.	By supplying sustainable renewable wind energy, the Proposed Project will reduce the need for greenhouse gas emitting, non-renewable sources like coal and oil for energy generation, helping to transition toward a low-carbon economy and cleaner energy usage in the County. By providing c. 62 MW of installed energy generating capacity, the Proposed Project will support the County and the State to transition to a low-carbon and climate-resilient society.
	2E) To ensure that the Development Plan transposes, supports and implements strategic objectives of the National Planning Framework and the Southern Regional Spatial and Economic Strategy to create an enabling local development framework that: (a) promotes and integrates important climate considerations in local development and the assessment of planning applications and (b) supports the practical implementation of national climate policy and targets to assist in the delivery of the national transition objective.	The Proposed Project aligns with Objective 2E as it contributes to the relevant National Policy Objectives within the Revised NPF, which seeks to transition to a low carbon and climate resilient economy. The Southern Region RSES supports the advancement of renewable energy in the area, and the Proposed Project, which will have a generating capacity of approximately 62 MW of clean renewable energy, is in line with this objective.
	2G) To reduce energy related CO2 emissions of Kilkenny County Council.	Projects such as the Proposed Project are a critical component in decoupling the County from reliance on fossil fuels and as such reducing energy related CO2 emissions.

Policy Theme	Policy/ Objective	Compliance
		By generating renewable energy, wind farms contribute to achieving the long-term goal of replacing fossil fuels with sustainable energy sources.
	2H) To achieve the commitment under the European Climate Alliance to the reduction of greenhouse gas emissions by 10 percent every 5 years.	By supplying sustainable renewable energy, the Proposed Project will reduce the need for non-renewable fossil fuel-based energy sources, helping to reduce greenhouse gas emissions.
Renewable Energy	**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.	The Proposed Project aligns with Objective 11A as it will generate clean, renewable electricity, which will be integrated into the grid, helping to electrify and decarbonise other sectors, therefore, reducing the reliance on imported fossil fuels and improving the sustainability and security of our national and regional energy system.
	Support the implementation of the NECP (National Energy & Climate Plan (NECP) and associated adaptation & mitigation measures	The Proposed Project will contribute to achieving key decarbonisation and energy security objectives within the NECP by adding a new renewable electricity generator to the national grid.
	Support the implementation of Ireland's Transition to a Low Carbon Energy Future	By providing c. 62 MW of installed energy generating capacity, the Proposed Project will support the County and the State to transition to a low carbon and climate resilient economy and society.
	Support the implementation of the All of Government Climate Action Plan (CAP) and associated adaptation and mitigation measures	The Proposed Wind Farm is in compliance with this Policy as it directly contributes to the wind energy target of 9GW of onshore wind introduced by CAP 23 and reiterated in CAP 24 and CAP 25.
	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	The Proposed Project aligns with this Policy as it will generate clean, renewable electricity, which will be integrated into the grid, helping to electrify and decarbonise other sectors. Reducing the reliance on imported fossil fuels and improving the sustainability and security of our national and regional energy system.

Policy Theme	Policy/ Objective	Compliance
	Support alternative forms of renewable energy for the electricity, heat, and transport sectors	By providing clean renewable energy and integrating into the grid, the Proposed Project will help to electrify and decarbonise other sectors, such as the heat and transport sectors.
Biodiversity	**1A)** To implement the provisions of Articles 6(3) and 6(4) of the EU Habitats Directive and ensure that any plan or project within the functional area of the Planning Authority is subject to appropriate assessment in accordance with the Guidance Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities, 20091 or any subsequent version, and is assessed in accordance with Article 6 of the Habitats Directive in order to avoid adverse impacts on the integrity and conservation objectives of the site.	The Proposed Project recognises the importance of European Sites in accordance with the relevant Directives and legislation. An NIS is submitted as part of the SID planning application in accordance with the requirements of the EU Habitats Directive and the Planning Act. The NIS concludes that where the potential for any adverse effect on any European Site has been identified, the pathway by which any such effect may occur has been robustly blocked through the use of avoidance, appropriate design and mitigation measures as set out within this report and its appendices. The measures ensure that the construction and operation of the Proposed Project do not adversely affect the integrity of European sites. Therefore, it can be objectively concluded that the Proposed Project, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site. Please refer to the NIS for further details.
Archaeology	**9C)** To protect archaeological sites and monuments (including their setting), underwater archaeology, and archaeological objects, including those that are listed in the Record of Monuments and Places, and in the Urban Archaeological Survey of County Kilkenny or newly discovered sub-surface and underwater archaeological remains.	Chapter 14 of the EIAR presents the results of an archaeological, architectural and cultural heritage impact assessment of the construction, operation and decommissioning of the Proposed Project. Chapter 14 assesses the potential direct and indirect effects of the Proposed Project on the surrounding archaeological, architectural and cultural heritage landscape. Chapter 14 of the EIAR concludes that no significant direct or indirect effects to the recorded cultural heritage resource as a result of the

Policy Theme	Policy/ Objective	Compliance
		Proposed Project have been identified. Where potential direct effects to sub-surface archaeology have been identified appropriate mitigation measures are proposed in order to ameliorate this potential effect. Please refer to Chapter 14 of the EIAR for further details.

Table 7-3 KCCDP (as varied) Wind Energy Development Management Guidance

Wind Energy Development Management Guidance	Compliance
Environmental Assessments (EIA, AA etc) including mitigation included in Construction Environment Management Plans (CEMPs);	An EIAR along with an AA Screening Report/NIS will accompany the SID planning application for the Proposed Development to the Commission. Both the EIAR and AA Screening Report/NIS contain the information necessary for the Commission to complete the Environmental Impact Assessment and Appropriate Assessment as required for this SID planning application. A full suite of mitigation measures for the Proposed Project are set out in the Construction and Environmental Management Plan which is included as Appendix 4-3 of the EIAR and in Chapter 18 of the EIAR. Please refer to the EIAR and AA Screening Report/NIS for further details.
Community engagement and participation aspects of the proposal and how its Community Benefit Fund will contribute to the wider County of Kilkenny's Energy Efficiency targets at a local level. (3CEA coordinate such proposals under the County Climate Action Plan.)	A Community Engagement Report has been prepared to accompany the planning application and is included at Appendix 2-2 of the EIAR. The Report outlines the consultation and community engagement initiatives undertaken by the Applicant prior to the submission of the SID planning application. It also outlines the main issues identified during this process, how the final proposal reflects community consultation and the steps taken to ensure that the Proposed Project will be of enduring economic benefit to the communities concerned. Please refer to Appendix 2-2 of the EIAR for further details.
Grid connection details	All elements of the Proposed Project including the Proposed Grid Connection have been assessed as part of the EIAR. Full details of the Proposed Grid Connection are included in **Chapter 4** of the EIAR as well as the full suite of planning drawings that accompany the SID planning application. Please refer to Chapter 8 of the EIAR for further details.
Geology and ground conditions, including peat stability; and management plans to deal with any potential material impact. Reference should be made to the	**Chapter 8** of the EIAR assesses the likely significant effects that the Proposed Project may have on land, soils and geology and sets out the mitigation measures prescribed to avoid, reduce or offset any potential significant effects that are identified.

National Landslide Susceptibility Map to confirm ground conditions are suitably stable for project;	The land, soils and geology of the Proposed Project site has been characterised using a combination of desk study and site investigation data. Several walkover surveys of the Proposed Wind Farm site have been completed as well as trial pits, boreholes, 2D resistivity (ERT) survey and seismic survey, microgravity geophysical survey and subsoil analysis. Chapter 8 concludes that with the proposed design, construction controls and ground-stability measures in place, the remaining effects on land, soils and geology are assessed as not significant. No significant combined effects with other developments are expected. Please refer to Chapter 8 of the EIAR for further details.
Site drainage and hydrological effects, such as • water supply and quality and watercourse crossings; • management plans to deal with any potential material impact on watercourses; • the hydrological table; • flood risk including mitigation measures;	Chapter 9 of the EIAR assesses the likely effects of the Proposed Project on rivers, streams, groundwater, water supplies and flood risk during construction, operation and decommissioning phases. It also considers effects on protected sites and potential combined effects with other developments. The assessment was informed by published information, site surveys, ground investigations, groundwater-level monitoring and water-quality testing. Three new watercourse crossings are proposed within the wind farm site, using clear-span or bottomless structures. Grid connection crossings will use existing structures or drilling beneath the channel. The River Nore crossing will be drilled beneath the river, with monitoring and procedures to manage any drilling-fluid release. No instream works are proposed. The Flood Risk Assessment identifies the wind farm, substation and battery storage compound as being in Flood Zone C, where the risk of river flooding is low. Some underground cable crossings pass through mapped flood zones, where construction will be managed to avoid flood conditions. The drainage system will slow runoff and prevent an increase in downstream flood risk. During operation, permanent drainage controls will remain in place and ground disturbance will be limited mainly to occasional maintenance. Decommissioning effects will be similar to construction effects but smaller in scale, with corresponding pollution-prevention measures applied. With the proposed design, mitigation and monitoring measures implemented, no significant effects on surface water, groundwater, water supplies or water-dependent protected sites are predicted. No significant effects on Water Framework Directive status, or significant combined effects with other developments, are predicted. Please refer to Chapter 9 of the EIAR for further details.

Landscape and visual impact assessment, including the size, scale and layout and the degree to which the wind energy project is visible over certain areas and in certain views;	Chapter 13 of the EIAR includes the Landscape and Visual Impact Assessment (LVIA) of the Proposed Project, focusing on the likely significant effects on landscape and visual amenity within a 20km LVIA Study Area. Although all elements of the Proposed Project are assessed, the Chapter focusses upon the Proposed Turbines, as they are deemed to be the primary essential aspects of the proposal under assessment from a landscape and visual perspective. The assessments were informed by site visits, photomontages (Volume 2 of the EIAR), ZTV mapping, a Route Screening Analysis, and an impact assessment methodology which follows best practice guidance for LVIA of wind farms. Chapter 13 concludes that the LVIA determined that the Proposed Wind Farm is located within a landscape that can effectively accommodate a wind energy development of this scale, given the large scale and nature of the receiving environment, comprising marginal upland foothills, agricultural pasture and commercial forestry, and the mitigation measures incorporated into the design of the Proposed Project. Whilst 'Significant' residual landscape and visual effects were identified in relation to Clomantagh Hillfort, these effects are localised and do not involve any direct alteration to the physical fabric of the hillfort. The assessments have determined that the landscape of the Proposed Wind Farm site is capable of effectively accommodating the Proposed Project. Please refer to Chapter 13 of the EIAR for further details.
Visual impact of ancillary development, such as grid connection and access roads;	Chapter 13 of the EIAR includes the Landscape and Visual Impact Assessment (LVIA) of the Proposed Project, focusing on the likely significant effects on landscape and visual amenity within a 20km LVIA Study Area. Although all elements of the Proposed Project are assessed, the Chapter focusses upon the Proposed Turbines, as they are deemed to be the primary essential aspects of the proposal under assessment from a landscape and visual perspective. The assessments were informed by site visits, photomontages (Volume 2 of the EIAR), ZTV mapping, a Route Screening Analysis, and an impact assessment methodology which follows best practice guidance for LVIA of wind farms. As the Proposed 110kV Underground Cabling Route which forms part of Proposed Grid Connection is located underground, landscape and visual effects during the operational phase will be 'Imperceptible' once the road surface has been reinstated and vegetation has re-established along the roadway or within agricultural land following earthworks during the construction phase. Please refer to Chapter 13 of the EIAR for further details.
Potential impact of the project on natural heritage, to include direct and indirect effects on protected sites or species, on habitats of ecological sensitivity and biodiversity value and, where necessary, management plans to deal with the satisfactory co-existence of the wind energy development and the particular species/habitat identified;	Chapter 6 of the EIAR assesses the likely significant effects (both alone and cumulatively with other projects) that the Proposed Project may have on Biodiversity, Flora and Fauna, and sets out the mitigation measures proposed to avoid, reduce or offset any potential significant effects that are identified. Chapter 6 concludes that provided that the Proposed Project is constructed and operated in accordance with the design, best practice and mitigation that is described within this application, significant residual impacts on biodiversity, flora and fauna will not occur. The biodiversity enhancement measures outlined for the Proposed Project will result in an improvement of the existing ecological conditions of the Site.

	The NIS provides an assessment of all potential direct or indirect adverse effects on European Sites. Where the potential for any adverse effect on any European Site has been identified, the pathway by which any such effect may occur has been robustly blocked through the use of avoidance, appropriate design and mitigation measures as set out within this report and its appendices. The measures ensure that the construction and operation of the Proposed Project do not adversely affect the integrity of European sites. Therefore, it can be objectively concluded that the Proposed Project, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site. Please refer to the Chapter 6 of the EIAR and the NIS for further details.
Potential impact of the project on the built heritage including archaeological and architectural heritage;	An assessment of the potential effects of the Proposed Project on the Cultural Heritage resource was carried out in Chapter 14 of the EIAR. Cultural heritage includes archaeology, architectural heritage and any other tangible assets. The assessment was based on desktop research, field survey, GIS based mapping, ZTV, and was also assisted by representative photomontages. Where potential effects have been identified, such as to potential sub-surface archaeology appropriate mitigation measures have been recommended in order to minimise any such effects. Proposed mitigation includes pre-development testing, archaeological monitoring of construction stage ground works and any further geotechnical site investigations. No potential direct effects to National Monuments, recorded monuments, Protected Structures or NIAH structures are identified. Potential indirect effects on the setting of any UNESCO World Heritage Sites and those on a Tentative List within 20km, National Monuments within 10km, recorded monuments within 5km and RPS/NIAH structures within 5km were included in order to assess potential effects on setting in the wider landscape. The ZTV was utilised to assess the level of theoretical visibility of the Proposed Turbines from cultural heritage assets within the 5km and 10km study areas. No significant effects on setting of recorded cultural or archaeological heritage assets, as a result of the Proposed Project, have been identified. An assessment of potential cumulative effects was also undertaken taking into consideration other extant planning applications and existing and proposed wind farms within 20km. While some potential cumulative visual effects to the wider setting of cultural heritage assets is possible when considered with the existing, permitted and proposed wind farms, no significant cumulative impacts have been identified and no cumulative effects to the immediate setting of cultural heritage assets will occur. Please refer to Chapter 14 of the EIAR for further details.

It is recommended that consideration of carbon emissions balance is demonstrated when the wind energy developments requires peat extraction	**Chapter 8** of the EIAR assesses the likely significant effects that the Proposed Project may have on land, soils and geology and sets out the mitigation measures prescribed to avoid, reduce or offset any potential significant effects that are identified. Chapter 8 states that there is no peat present at the Site. Chapter 10 of the EIAR identifies, describes, and assesses the potential significant direct and indirect effects on air quality arising from the construction, operation and decommissioning of the Proposed Project. By providing an alternative to electricity derived from coal, oil or gas-fired power stations, the Proposed Project will result in emission savings of carbon dioxide (CO2), oxides of nitrogen (NOx), and sulphur dioxide (SO2). The production of renewable energy from the Proposed Project will have a Long-Term Moderate Positive effect on air quality due to the offsetting of approximately 28,277 tonnes of Carbon Dioxide (CO2) per annum, or 989,687 tonnes of carbon dioxide over the proposed 35 year lifecycle of the Proposed Project. Please refer to Chapter 8 and Chapter 10 of the EIAR for further details.
Local environmental impacts including noise, shadow flicker, electromagnetic interference, etc.	Chapter 12 of the EIAR includes a noise and vibration assessment to determine the likely significant effects from the construction, operational and decommissioning phases of the Proposed Project, at nearby noise sensitive receptors (residential properties). Predicted operational noise levels from the Proposed 110kV Substation and BESS have a low impact as defined in BS 4142, at all of the nearest noise sensitive receptors during the daytime and the night-time. Accordingly, no significant effects are anticipated. Site-Specific Noise Limits (SSNL) have been derived in accordance with the IOA GPG with due regard to cumulative noise by accounting for the proportion of the Total Guidelines Noise Limit which is potentially being used by other nearby developments. Predicted operational noise levels from the Proposed Wind Farm on its own indicate that SSNL at all Noise Assessment Locations (NAL) will be met and therefore the effect is deemed to be not significant. The use of SSNL will ensure that the Proposed Wind Farm could operate concurrently with other operational wind farm developments in the area and will also ensure that the Proposed Wind Farm's individual contribution could be measured and enforced if required. The key issues examined in Chapter 5 of the EIAR include population, human health, employment and economic activity, land use, residential amenity (including visual amenity, shadow flicker and noise), community facilities and services, tourism, property values, traffic and health and safety. Shadow flicker is an effect that occurs when rotating wind turbine blades cast shadows over a window in a nearby property. Shadow flicker lasts only for a short period of time and occurs only during certain specific combined circumstances. The Guidelines recommend that shadow flicker at neighbouring dwellings within 500 metres of a proposed turbine location should not exceed a total of 30 hours per year or 30 minutes per day.

	The results of the cumulative shadow flicker assessment found no potential cumulative shadow flicker effects from the Proposed Wind Farm and the proposed Gathabawn Wind Farm. Chapter 15 assesses the likely significant effects of the Proposed Project on material assets. There are no electromagnetic interference impacts for telecommunications and aviation assets or operations associated with the construction phase of the Proposed Wind Farm or Proposed Grid Connection and therefore no mitigation is required. The potential for electromagnetic interference from proposed turbines may only occur during the operational phase of the Proposed Project. Please refer to Chapter 12, Chapter 5 and Chapter 15 of the EIAR for further details.
Adequacy of local access road network to facilitate construction of the project and transportation of large machinery and turbine parts to site, including a traffic management plan;	Chapter 15 of the EIAR considers the likely significant effects of the Proposed Project on the surrounding road network during the construction, operation and decommissioning phases. An assessment of cumulative traffic effects was undertaken, taking account of other permitted and proposed developments in the surrounding area. Gathabawn Wind Farm and Littleton Wind Farm were identified as having the greatest potential for cumulative traffic effects due to their use of the R639. Where possible, construction of the Proposed Project will be scheduled to avoid overlapping with these developments. Should construction periods overlap, cumulative traffic effects are expected to be negative, short-term and slight, with no significant effects predicted. Overall, the assessment concludes that the most noticeable traffic and transport effects will occur during construction, particularly during concrete deliveries and the installation of the Proposed 110kV Underground Cabling. Following implementation of the proposed mitigation measures, residual construction traffic effects are assessed as short-term, slight and negative, with no significant effects anticipated. Please refer to Chapter 15 of the EIAR for further details.
Information on any cumulative effects due to other projects, including effects on natural heritage and visual effects;	Chapter 6 of the EIAR assesses the likely significant effects (both alone and cumulatively with other projects) that the Proposed Project may have on Biodiversity, Flora and Fauna, and sets out the mitigation measures proposed to avoid, reduce or offset any potential significant effects that are identified. Chapter 6 concludes that provided that the Proposed Project is constructed and operated in accordance with the design, best practice and mitigation that is described within this application, significant residual impacts on biodiversity, flora and fauna will not occur. The biodiversity enhancement measures outlined for the Proposed Project will result in an improvement of the existing ecological conditions of the Site. Chapter 13 of the EIAR includes the Landscape and Visual Impact Assessment (LVIA) of the Proposed Project, focusing on the likely significant effects on landscape and visual amenity within a 20km LVIA Study Area. Although all elements of the Proposed Project are assessed, the Chapter focusses upon the Proposed Turbines, as they are deemed to be the primary essential aspects of the proposal under assessment from a landscape and visual perspective. The assessments were informed by site visits, photomontages (Volume 2 of the EIAR), ZTV mapping,

	a Route Screening Analysis, and an impact assessment methodology which follows best practice guidance for LVIA of wind farms. Cumulative visual effects have the greatest potential to arise with other existing, permitted and proposed wind energy developments. The most notable combined views of the Proposed Turbines and cumulative turbines occur from elevated vantage points within the surrounding Slieveardagh Hills landscape. Cumulative visual effects will also occur from longer ranging views of the upland area from elevated vantage points throughout the wider landscape. The proposed Gathabawn, Seskin Renewables and Littleton Wind Farms may contribute to further cumulative visual effects in an uncertain future receiving environment, subject to the outcome of the planning process. Chapter 13 concludes that the LVIA determined that the Proposed Wind Farm is located within a landscape that can effectively accommodate a wind energy development of this scale, given the large scale and nature of the receiving environment, comprising marginal upland foothills, agricultural pasture and commercial forestry, and the mitigation measures incorporated into the design of the Proposed Project. Whilst 'Significant' residual landscape and visual effects were identified in relation to Clomantagh Hillfort, these effects are localised and do not involve any direct alteration to the physical fabric of the hillfort. The assessments have determined that the landscape of the Proposed Wind Farm site is capable of effectively accommodating the Proposed Project. Please refer to Chapter 6 and Chapter 13 of the EIAR for further details.
Information on the location of quarries to be used or borrow pits proposed during the construction phase and associated remedial works thereafter;	Chapter 4 of the EIAR describes the Proposed Project in full detail, including the development of an on-site Borrow Pit. The construction of the Proposed Project will require the excavation of spoil. The quantities of spoil, requiring management on the Proposed Wind Farm site has been calculated is presented. Stone material will be required to construct the Proposed Project and it is intended to obtain the majority of materials for the construction of the Proposed Project from the proposed on-site borrow pit. The extraction of material from the borrow pit is a construction phase activity only of the Proposed Project which will be a temporary operation run over a short period of time during the construction phase. It is proposed to manage excess overburden generated through construction activities within the Wind Farm site. A portion of the excavated material will be used as fill for the creation of level works areas for construction. The remaining volume of spoil to be placed within the spoil management area, within linear berms alongside sections of Proposed Wind Farm site roads (where appropriate, avoiding environmentally constrained areas) and through backfilling of the proposed borrow pit void. Please refer to Chapter 4 of the EIAR for further details.
Disposal or elimination of waste/surplus material from construction/site clearance, particularly significant for peatland	Chapter 15 of the EIAR considers other utilities or built services in the area such as electricity supply and transmission, water, gas and underground telecommunications. This section also considers waste management during the construction, operational and decommissioning phases of the Proposed Project.

	There are no EPA-licensed or local authority-authorised waste facilities or activities located within the Site. The nearest licensed waste facility to the Proposed Wind Farm site is Dunmore Recycling and Waste Disposal located approximately 14.5km to the southeast of the Site. A Waste Management Plan (WMP) has been prepared and forms part of the CEMP. The WMP outlines the methods of waste prevention and minimisation by recycling, recovery and reuse at each stage of construction of the Proposed Project. Disposal of waste will be a last resort. The WMP outlines the methods of waste prevention and minimisation by recycling, recovery and reuse at each stage of construction of the Proposed Project. Disposal of waste will be a last resort. Please refer to Chapter 15 of the EIAR for further details.

Table 7-4 Grid Connection Development Management Guidance

Grid Connection Development Management Guidance	Compliance
The development is required in order to facilitate the provision or retention of significant economic or social infrastructure;	In accordance with Section 37B of the Planning Act, the Applicant engaged in pre-application consultations with the Commission in order to determine whether the Proposed Project constituted Strategic Infrastructure Development. Following pre-application consultation with the Commission in relation to Proposed Project, the Commission formed the opinion, under Section 37A(2)(a) and (2)(b), that the Proposed Project does fall within the definition of Strategic Infrastructure Development within the meaning of the Planning Act. The Commission served notice of their opinion under Section 37B(4)(a) in an SID Determination Letter dated the 9th of October 2026. The Proposed Grid Connection which forms part of the Proposed Project will connect the Proposed Wind Farm to the national electricity grid and will support to the contribution or national renewable energy and climate action targets.
The route proposed has been identified with due consideration for social, environmental and cultural impacts; The design is such that will achieve least environmental impact; Where impacts are inevitable, mitigation features have been included.	Chapter 6 of the EIAR assesses the likely significant effects (both alone and cumulatively with other projects) that the Proposed Project may have on Biodiversity, Flora and Fauna, and sets out the mitigation measures proposed to avoid, reduce or offset any potential significant effects that are identified. Chapter 6 concludes that provided that the Proposed Project is constructed and operated in accordance with the design, best practice and mitigation that is described within this application, significant residual impacts on biodiversity, flora and fauna will not occur. The biodiversity enhancement measures outlined for the Proposed Project will result in an improvement of the existing ecological conditions of the Site. The NIS provides an assessment of all potential direct or indirect adverse effects on European Sites. Where the potential for any adverse effect on any European Site has been identified, the pathway by which any such effect may occur has been robustly blocked through the use of avoidance, appropriate design and mitigation

	measures as set out within this report and its appendices. The measures ensure that the construction and operation of the Proposed Project do not adversely affect the integrity of European sites. Therefore, it can be objectively concluded that the Proposed Project, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site. An assessment of the potential effects of the Proposed Project on the Cultural Heritage resource was carried out in Chapter 14 of the EIAR. Cultural heritage includes archaeology, architectural heritage and any other tangible assets. The assessment was based on desktop research, field survey, GIS based mapping, ZTV, and was also assisted by representative photomontages. Chapter 14 concludes that no significant direct or indirect effects to the recorded cultural heritage resource as a result of the Proposed Project have been identified. Where potential direct effects to sub-surface archaeology have been identified appropriate mitigation measures are proposed in order to ameliorate this potential effect. Please refer to the Chapter 6 and Chapter 14 of the EIAR, and the NIS for further details.
The lines should be planned to avoid areas of high landscape sensitivity; Where considered necessary by the Council, a Visual Impact Assessment and a Landscape Impact Assessment will be required for significant Grid Infrastructural projects.	Chapter 13 of the EIAR includes the Landscape and Visual Impact Assessment (LVIA) of the Proposed Project, focusing on the likely significant effects on landscape and visual amenity within a 20km LVIA Study Area. Although all elements of the Proposed Project are assessed, the Chapter focusses upon the Proposed Turbines, as they are deemed to be the primary essential aspects of the proposal under assessment from a landscape and visual perspective. The assessments were informed by site visits, photomontages (Volume 2 of the EIAR), ZTV mapping, a Route Screening Analysis, and an impact assessment methodology which follows best practice guidance for LVIA of wind farms. As the Proposed 110kV Underground Cabling Route which forms part of Proposed Grid Connection is located underground, landscape and visual effects during the operational phase will be 'Imperceptible' once the road surface has been reinstated and vegetation has re-established along the roadway or within agricultural land following earthworks during the construction phase. Please refer to Chapter 13 of the EIAR for further details.
Preference should be given to undergrounding services where appropriate; 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;	The Proposed Wind Farm will connect to the national grid via underground electrical cabling, located primarily within the public road corridor, with some small sections passing through private agricultural land. Underground electrical cables will transmit the power output from each wind turbine to the Proposed 110kV Substation, and from there to the existing Ballyragget 110kV substation, via an underground electrical cabling route, measuring approximately 12.6km in length. A key consideration in determining the grid connection method for a proposed wind energy development is whether the cabling is underground or run as an overhead line (OHL). An alternative to the approximately 12.6km Proposed 110kV Underground Cabling would be to construct an OHL from the Proposed 110kV Substation to the existing 110kV Ballyragget substation following a similar route to that of the Proposed 110kV underground cabling route.

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	While OHL are less expensive and allow for easier repairs when required, underground cabling will have no visual impact. For this reason, it was considered that underground cabling would be a preferable alternative to overhead lines. The Guidelines also indicate that underground cables are the preferred option for connection of a wind energy development to the national grid. The Proposed 110kV underground cabling will follow the route of existing public road insofar as possible in order to minimise the amount of ground disturbance required. The Proposed 110kV Underground Cabling to Ballyragget 110kV substation has been revised and refined to take account of the findings of the site investigations and baseline assessments, which have informed the Proposed Grid Connection design. Please refer to Chapter 3 of the EIAR for further details.
That existing grid infrastructure should be used where possible in preference to erecting new grid infrastructure.	
Any proposed development must avoid impact on any Special Area of Conservation.	The NIS provides an assessment of all potential direct or indirect adverse effects on European Sites. Where the potential for any adverse effect on any European Site has been identified, the pathway by which any such effect may occur has been robustly blocked through the use of avoidance, appropriate design and mitigation measures as set out within this report and its appendices. The measures ensure that the construction and operation of the Proposed Project do not adversely affect the integrity of European sites. Therefore, it can be objectively concluded that the Proposed Project, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site. Please refer to the NIS for further details.

7.2.2 Kilkenny City and County Development Plan 2021-2027 Wind Energy Development Strategy

The Kilkenny Wind Energy Development Strategy 2021 ('Kilkenny WEDS') forms Appendix K of the KCCDP (as varied). The Kilkenny WEDS provides a clear framework for the Council's objectives and methodology for identifying suitable locations for wind energy development in the county. By considering the relevant policy context, this strategy aims to guide and streamline the process of wind energy development in a way that aligns with the overall goals and priorities set by the Council. This approach ensures that sustainable and well-planned wind energy projects can be successfully implemented in the county. The key objectives of the WEDS are set out below:

"The key objectives of this Wind Strategy are as follows:

- *Recognise the importance of wind energy as a renewable energy source and ensure the security of energy supply by supporting, in principle and at appropriate scales and locations, the development of wind energy resources in the county.*
- *Promote the development of wind energy and other renewable energy sources in the county to meet national renewable energy targets (supplying a minimum of 100% of electricity consumption from renewable sources by 2030).*
- *Enable Kilkenny to generate the equivalent of 100% of its electricity needs from renewable energy.*
- *Identify strategic areas in the county for wind energy development.*
- *Provide specific criteria for wind energy development that the planning authority will take into account when considering any wind energy or related proposals.*
- *Investigate the potential for relatively small-scale wind energy developments within urban and industrial areas, and for small community-based proposals outside the strategic areas."*

Chapter 5 of the WEDS characterises the county into 3 different policy areas aimed at facilitating wind farm growth. These policy areas are based on a sieve mapping approach to identify suitable areas for wind energy developments on a number of characteristics. The Strategy areas and descriptions are set out in Table 7-5 below.

Table 7-5 Kilkenny WEDS Wind Energy Strategy Areas

Kilkenny County Council – Wind Energy Strategy Areas	
Strategy Areas	Description
Acceptable in Principle -	*This is the preferred area for wind energy development, characterised by high wind speeds, and no significant conflict with environmental designations or sensitivities.*
Open for Consideration -	*This area is characterised by no significant conflict with environmental designations or sensitivities.*
Not Normally Permissible -	*This area is considered to be generally unsuitable for wind farm development. Individual turbines will be considered on a case-by-case basis.*

The Proposed Turbines are located within two Wind Strategy Areas as per Figure 11.4 Wind Strategy Areas of KCCDP (as varied) and as shown in Figure 7-1 below, specifically T1 and T2 are located in an area classified in the 'Acceptable in Principle' ('AIP'), and T3-T10 are located in an area classified as 'Not Normally Permissible' ('NNP').

However, as outlined above the Draft Ministerial Direction, published on the 15th of October 2021, states that:

> *"In accordance with Section 31(4) 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;*
>
> *Chapter 11 Renewable Energy: Section 11.4 Kilkenny Targets, Section 11.5.1 Current status and targets and* ***Figure 11.4 Wind Strategy areas."*** (emphasis added).

The Kilkenny WEDS sets out four different categories of wind energy developments depending on their scale as follows:

a) Individual wind turbines
b) Auto producer
c) Small scale wind developments/Community Schemes (Compliant with the REDII Directive definition of community)
d) Large scale wind developments

The Kilkenny WEDS states the following in relation to 'large scale wind energy developments', which are classified as wind energy projects above 5MW:

> *"Large-scale wind energy developments will, in usual circumstances, only be considered in 'Acceptable in principle' areas. The rationale behind this policy is to minimise the visual impacts of such large-scale developments, in addition to effects on the environment of County Kilkenny as a whole, as well as to facilitate appropriate grid connections. These will be assessed in accordance with the Wind Energy Development Guidelines."*

This policy effectively limits all wind energy developments (bar small installations below 5MW) to the *'Acceptable in Principle'* areas. However, since the wind strategy areas for Kilkenny (as shown in Figure 11.4 of the KCCDP) are taken not to have come into effect, this policy cannot be applied to the Proposed Development, and so in this scenario there cannot be any contravention of this policy.

Furthermore, it was highlighted by the OPR in their submission to the draft Development Plan, that no national policy basis exists for the restrictive policy relating to large scale wind energy developments and that its inclusion in the KCCDP (as varied) is unjustified, as set out by the OPR below:

> *"It is also noted that in Table 11.3 'Wind Energy Strategy Areas/ Policy Approach' large scale wind farm development will only be considered in areas designated as 'acceptable in principle', and that wind energy development in areas 'open for consideration' is subject to restrictions under Section 11.5.2. This means that the amendments to change geographical areas designated in the draft Plan as 'acceptable in principle' to 'open for consideration'* ***unreasonably and substantially restrict the opportunity for County Kilkenny to contribute to the national targets for renewable energy set out in the Climate Action Plan 2019.***
>
> *Furthermore the restrictions in relation to the scale of wind farms under section 11.5.2* ***have no national policy basis for such wind development****. This may have implications for the implementation of your plan, including the decisions of An Bord Pleanála in the context of Section 37(2)(b) of the Act"* (emphasis added).

In the absence of an up-to-date Wind Energy Strategy with a spatial dimension for Kilkenny, it is considered that there is sufficient policy direction at European, national, regional and local level to enable the Proposed Project to be assessed on its merits. The provision of the Proposed Project remains supported by local climate change and renewable energy policy within the KCCDP (as varied), as it recognises the role that indigenous renewable energy has on increasing Kilkenny's energy sustainability and security by reducing dependence on imported fossil fuels.

In similar circumstances in the absence of specific local policy, Planning Authorities have found that there is a comprehensive range of guidance and policy objectives at a national and regional level generally in relation to wind farm developments, and while certain aspects of the KCCDP (as varied) are not in effect,

this does not imply that there is a complete vacuum in policy which precludes the Planning Authority from determining the application before it in accordance with the proper planning and sustainable development of the area.

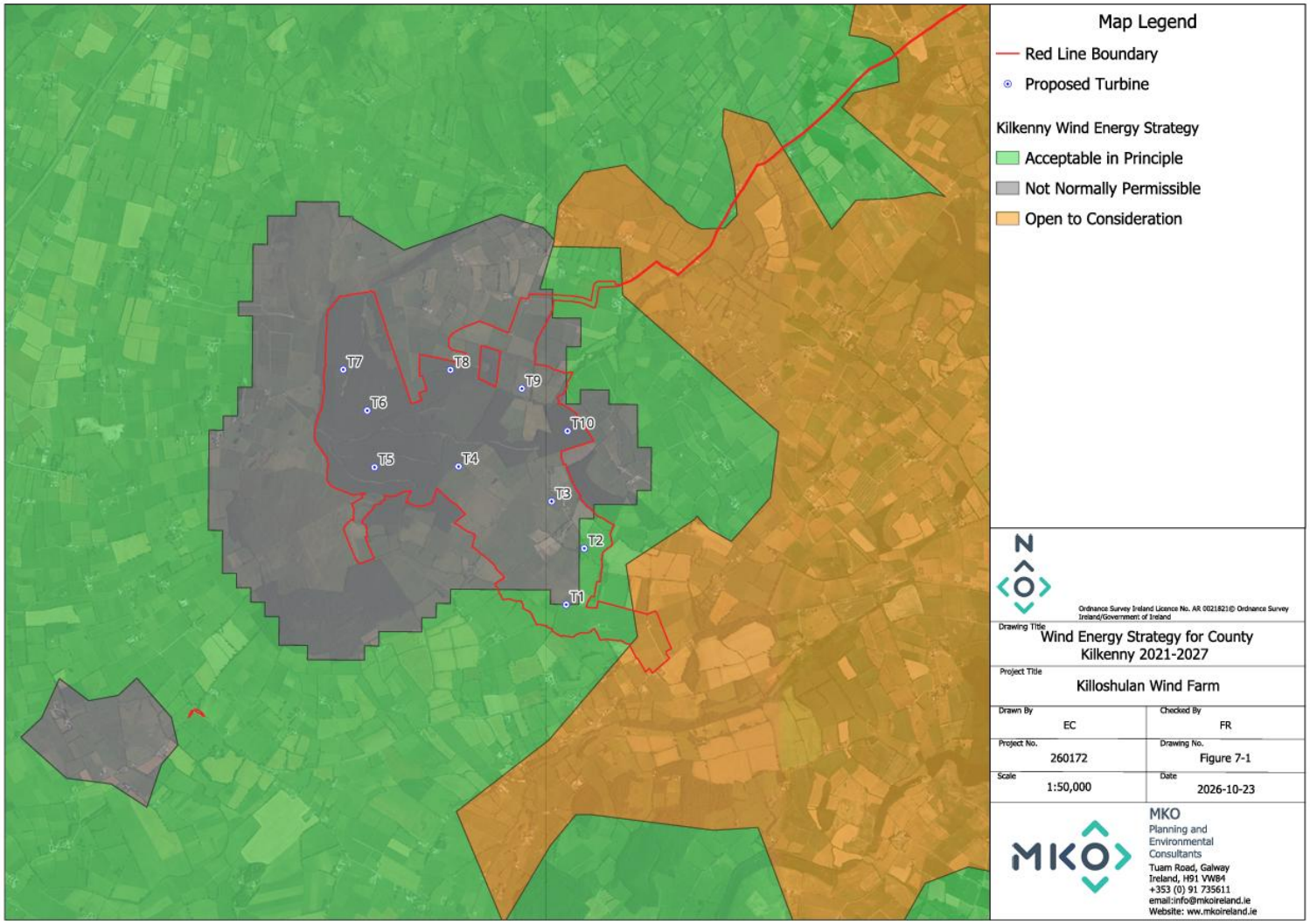


Figure 7-1 KCCDP (as varied) Wind Strategy Areas showing Proposed Wind Farm location

7.2.3 Kilkenny City and County Development Plan 2014-2020

As detailed in Sections and 6.1.2 and 7.2.1 above, while the KCCDP is the statutory development plan in effect for the County the following parts of the plan referred to within the 2021 Draft Ministerial Direction are taken not to have come in effect; Section 11.4 Kilkenny Targets, Section 11.5.1 Current status and targets and Figure 11.4 Wind Strategy Areas contained in Chapter 11 Renewable Energy of the KCCDP.

Accordingly, in accordance with Section 31(6)(b) of the 2000 Act, the corresponding provisions of the previous KCCDP 2014-2020 shall not cease to have effect until such a time that there is a conclusion to the Minister's intervention in the KCCDP and a final Ministerial Direction is issued. At time of writing a final Ministerial Direction has not been issued.

The status of the relevant 'corresponding provisions' of the KCCDP 2014-2020 was the subject of a recent decision of the High Court in Save the South Leinster Way & Anor v An Coimisiún Pleanála & Ors [2025] IEHC 541. This decision confirms that it is only the directly corresponding provisions of the KCCDP 2014-2020 which are deemed to have continued effect on a limited 'vestigial basis[7]' (i.e. Figure 10.2, Wind Energy Development Strategy map and the associated explanatory policy text in Section '10.5.4 Wind Energy Policy Areas') and not the Renewable Energy Strategy in the KCCDP 2014-2020 as a whole.

Accordingly, the relevant 'corresponding provision' of the KCCDP 2014-2020 which continue to have effect in this case is the Wind Energy Development Strategy map presented in Figure 10.2, Chapter 10 Renewable Energy Strategy and explanatory policy text in Section '10.5.4 Wind Energy Policy Areas'.

In the KCCDP 2014-2020 the Proposed Development Site is situated on lands identified as 'Unsuitable' (for wind energy development) in the Wind Energy Development Strategy map presented in Figure 10.2 in the KCCDP 2014-2020. Figure 7-2 contains an extract of Figure 10.2 (Wind Energy Development Strategy map). The associated explanatory policy text in Section 10.5.4 'Wind Energy Policy Areas' states that only 'Individual turbines' or 'Auto producers' will be considered on such 'Unsuitable' designated lands. It further states that 'Large-Scale Wind Energy Developments of >5MW, such as the Proposed Project, *'will, in usual circumstances, only be considered in 'Preferred' areas'.* The rationale behind this policy is to minimise the visual impacts of such large-scale developments, in addition to effects on the environment of County Kilkenny as a whole, as well as to facilitate appropriate grid connections.

The KCCDP 2014-2020 therefore effectively limits all wind energy developments (bar small installations below 5MW) to the 'acceptable in principle' areas in usual circumstances. However, the KCCDP 2014-2020 does not explain what may constitute circumstances which are other than usual. It is submitted that this leaves scope for evaluative planning judgement as to what circumstances might otherwise justify large scale wind energy developments of >5MW in areas which are not 'acceptable in principle'.

In this context it is relevant to consider the overarching zoning rationale for such 'large scale wind developments of >5MW' such as the Proposed Development. The KCCDP 2014-2020 states:

"Large-scale wind energy developments will, ***in usual circumstances****, only be considered in 'Preferred' areas. The rationale behind this policy is to* ***minimise the visual impacts*** *of such large scale developments, in addition to* ***effects on the environment*** *of County Kilkenny as a whole, as well as to* ***facilitate appropriate grid connections****. These will be* ***assessed in accordance with the Wind Energy Development Guidelines."*** (emphasis added)

In this context it is also relevant to consider the strategic climate change and renewable energy objectives of the KCCDP which are in force and the significant contribution that the Proposed Development will makes to the achievement of same.

[7] *Save the South Leinster Way & Tara Heavey v An Coimisiún Pleanála & Ors ([2025] IEHC 541.*

It is a strategic aim of the KCCDP to provide a policy framework with objectives and actions to facilitate the transition to a low carbon and climate resilient County by reducing greenhouse gas emissions (Chapter 2 Climate Change). The Proposed Development which will displace 28,277 tonnes of carbon dioxide per annum, or 989,687 tonnes over the 35-year operational life, represents a positive contribution to the strategic climate change objectives of the KCCDP and national and EU climate action targets.

It is a strategic aim of the KCCDP to generate 100% of electricity demand for the County through renewables by 2030, by promoting and facilitating all forms of renewable energies in suitable locations having due regard to natural and built heritage, biodiversity and residential amenities (Chapter 11 Renewable Energy). As detailed in Section 7.2.1, the KCCDP identified that County Kilkenny will need to install 253MW of renewable capacity to reach its strategic aim of generating 100% of their electricity demand from renewables. The Proposed Project will make a significant contribution towards achieving this important target by delivering 62MW of installed capacity to the national electricity grid or almost 25% of the 253MW needed.

The Proposed Development has been designed having due regard to natural and built heritage, biodiversity and residential amenities. Overall, the Site is considered appropriate for the proposed wind farm and represents a positive contribution to national and EU climate action targets with an estimated installed capacity of approximately 62MW, and potential to power approximately 49,560 Irish households with renewable energy and displace 28,277 tonnes of carbon dioxide per annum (989,687 tonnes over the 35-year operational life).

As concluded in the EIAR and outlined in Section 8.4, the Proposed Project has been thoroughly assessed and with the mitigation measures outlined in the EIAR in place the Proposed Project will be capable of being constructed, operated and decommissioned without likely significant effects on the environment with the exception of a Significant' residual landscape and visual effects identified in Chapter 13 in relation to Clomantagh Hillfort, however, these effects are localised and do not involve any direct alteration to the physical fabric of the hillfort generally.

It should be noted that in all instances, the Proposed Project exceeds the recommended 500m set back distance in the Guidelines and also is in line with the 4 times tip height set-back distance (in this case 740m) set out for residential visual amenity prescribed by the Draft Guidelines.

Similarly, as concluded in the NIS and outlined in Section 8.5 above, all potential effects arising from the Proposed Project have been mitigated to the extent that there is no potential for adverse effects on the integrity of any European Site, as a result of the Proposed Project.

The 2021 Draft Ministerial Direction identifies that the KCCDP as adopted contains conflicting objectives on renewable energy, sustainable development and climate action and as such '*fails to set out an overall strategy for the proper planning and sustainable development of the area'*. Specifically, the 2021 Draft Ministerial Direction identifies that the adopted Plan does not identify sufficient areas as 'acceptable in principle' for wind energy development in order to achieve the target to ensure that 100% of electricity demand for Kilkenny is met from renewable sources by 2030 and to ensure consistency with the climate action plan.

A detailed County-wide wind energy capacity analysis has been prepared as part of this application and is detailed in Section 8 of this report which demonstrates that it is only possible for County Kilkenny to reach its renewable energy capacity target (of 253MW) if viable areas outside of the mapped AIP and OTC Wind Strategy Areas (in Figure 11.4 of the KCCDP) are considered. Given the urgency of national climate and energy targets, it is imperative that all viable sites within the county are considered for wind energy development. As such, every site brought forward for wind energy development needs to be assessed on the individual merit and suitability of the site for wind energy, regardless of its wind energy classification. Refer to Section 8 below for details.

Considering the 2021 Draft Ministerial Direction, the findings of the County-wide wind energy capacity analysis and the findings of the EIAR and NIS, it is submitted that Proposed Development which constitutes a large-scale wind energy development under the extant provisions of the KCCDP 2014-2020 is in accordance with the provisions of proper planning and sustainable development due to the suitability of the site and the urgent need for renewable energy development of this scale.

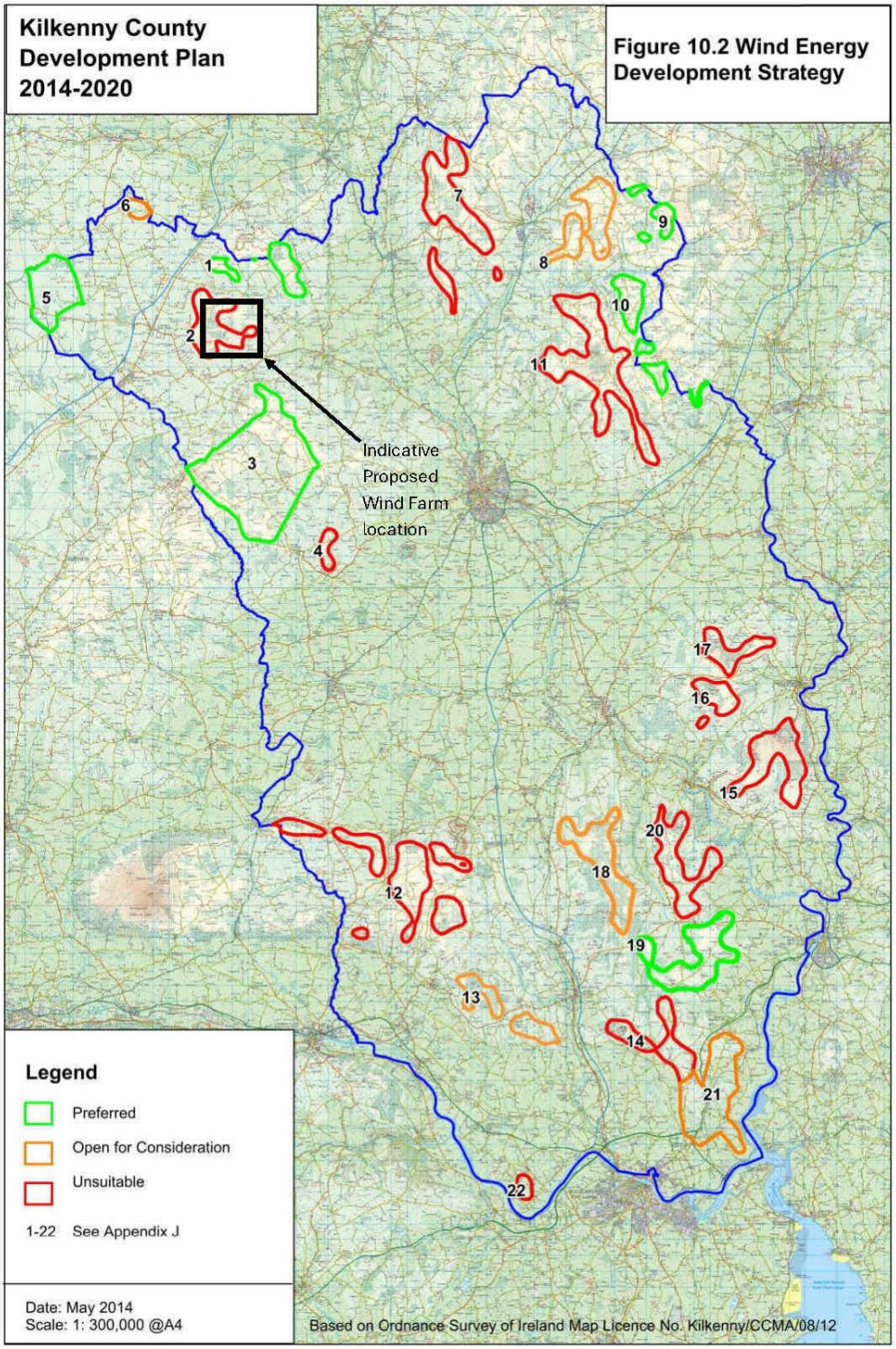


Figure 7-2 Extract of Figure 10.2 Wind Energy Development Strategy from the KCCDP 2014-2020

8. WIND ENERGY CAPACITY ASSESSMENT

A constraints analysis was carried out for the Site at an early stage in the design process to identify a 'viable area' for wind energy development which is detailed in Section 5 of this Planning Report and Chapter 3 of the EIAR.

This project level constraints analysis was then applied to the entire County in order to determine the County's potential to meet the wind energy targets stated in the KCCDP (as varied). The KCCDP (as varied) has a strategic aim of generating 100% of their electricity demand from renewable sources which equates to 253MW of installed renewable energy capacity by 2030 or "2.09% of the Country's 12.1 GW combined onshore and offshore renewable energy target". This assessment is based on the mapped Wind Strategy Areas contained in Figure 11.4 of the KCCDP which represents the most up to date publicly available dataset of Wind Strategy Areas for County Kilkenny.

8.1 Constraint Buffer Rationale

The rationale for selecting and applying the various constraints and setback distances as part of this wind energy capacity assessment is based on statutory guidelines, best practice industry standards and expert judgement. The rationale for each constraint buffer is summarised in Table 8-1 below.

It should be noted that the buffer with the largest impact, being the 4 times tip height set-back from dwellings, is a requirement of Special Planning Policy Requirement 2, as set out in the Draft Guidelines, which states as follows:

> *"With the exception of applications where reduced setback requirements have been agreed with relevant owner(s) as outlined at 6.18.2 below, planning authorities and An Coimisiún Pleanála (where relevant), shall, in undertaking their development planning and development management functions,* ***ensure that a setback distance for visual amenity purposes of 4 times the tip height of the relevant wind turbine shall apply between each wind turbine and the nearest point of the curtilage of any residential property in the vicinity of the proposed development,*** *subject to a mandatory minimum setback of 500 metres from that residential property. Some discretion applies to planning authorities when agreeing separation distances for small scale wind energy developments generating energy primarily for onsite usage. The planning authority or An Coimisiún Pleanála (where relevant), shall not apply a setback distance that exceeds these requirements for visual amenity purposes."* (**Emphasis added**)

The 700m setback distance applied in this instance, is based on a wind turbine tip height of 175m (175m x 4 = 700m), which is less than the 185m tip height range being applied for as part of the subject SID planning application. A 175m tip height was selected as it represents average turbine tip heights for wind energy developments. A rotor diameter of 150m was also selected, based on a typical rotor diameter of a wind turbine of 175m tip height.

While it is acknowledged that a smaller turbine would result in reduced setback requirement, it should be noted that wind turbine technology has been advancing rapidly in recent years with a trend towards larger, more efficient models. As a result, many smaller models that have been constructed in the past are no longer widely available and would not make the most efficient use of the wind resource of the County.

Designated sites (such as SACs, SPAs, NHAs, pNHAs) plus a 100m buffer was excluded from the capacity assessment due to the ecological sensitivity of such sites and the restrictions on development that could negatively impact such sites.

A setback of 3.5x Rotor Diameter (525m) from overhead lines was also applied, as set out in EirGrid's Policy on Wind Turbine Clearance to Overhead Lines[8].

[8] https://www.eirgridgroup.com/site-files/library/EirGrid/Wind-Turbine-Clearance-Policy.pdf

A setback of 192.5m from motorways, primary, regional and secondary roads, and from railway lines was applied in line with the Draft Guidelines, which states as follows:

> *"Although wind turbines erected in accordance with standard engineering practice are stable structures, best practice indicates that it is advisable to achieve a safety set back from National and Regional roads and railways of a distance equal to the height of the turbine to the tip of the blade plus 10%."*

A setback of 82.5m (blade length plus 10%) from local roads was also applied in line with best practice. A setback of 50m from watercourses/water bodies was applied in line with best practice.

Sites with existing and permitted turbines were also excluded due to these sites being unavailable for development. As of Section 5.13 of the Guidelines, turbine windtake is equal to 7 x rotor diameter in prevailing wind direction and 3 x rotor diameter in crosswind direction.

Wind energy developments must be of a certain scale to justify the required investment in grid connection infrastructure and still be commercially competitive. Therefore, very small unconstrained and potentially viable areas, particularly where they are isolated from larger viable areas, are unlikely to be able to support the development of a commercially competitive wind farm. To account for this commercial reality, a "small area filter" was applied to the viable areas mapped in this study, to identify and discount areas below a certain size from being considered further in the study.

Two criteria were used for the small area filter, as described below and illustrated in Figure 8-1 below.

1. Areas must be greater than 0.5km2 in area, or
2. Areas less than 0.5km2 must be located in close proximity to other viable areas that, when considered cumulatively, are greater than 0.5 km^2

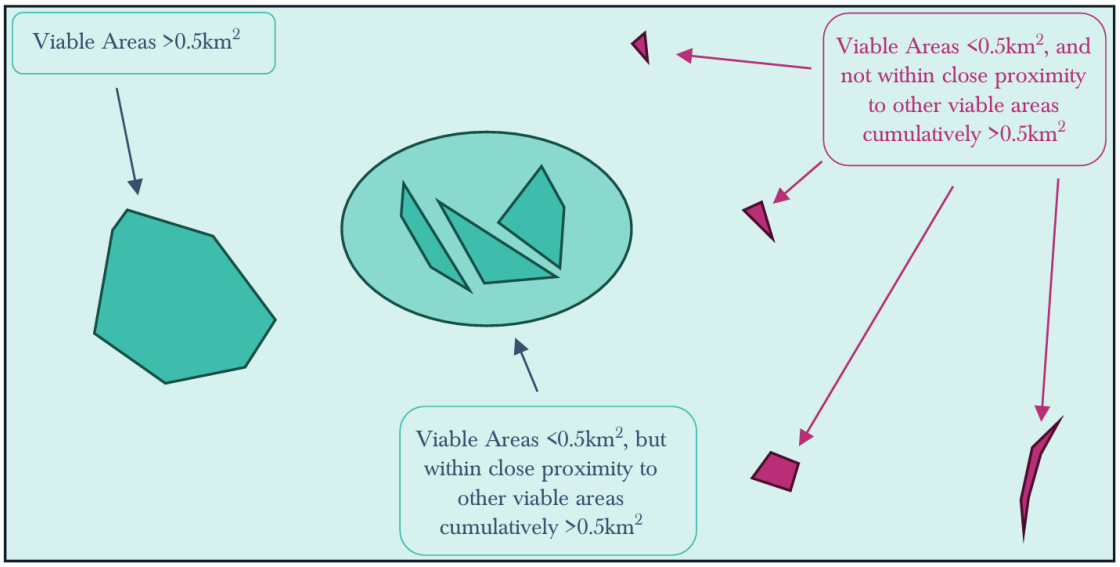


Figure 8-1 Illustrative example of the application of the small area filter

Table 8-1 below shows a summary table of the constraints applied in the wind energy assessment.

Table 8-1 Constraints and Rationale

Constraint	Buffer	Constraint Rationale
Housing	700m	Approximately 4x tip height in accordance with the setback requirements set out in the Draft Guidelines for the protection of residential amenity, based on a tip height of 175m.

Designated Sites	100m	Best practice industry standard based on ecological sensitivity.
Overhead Lines	525m (3.5x Rotor Diameter for 110kV, 220kV and 440kV lines) 192.5m (Tip Height + 10% for 38kV lines)	EirGrid's Policy on Wind Turbine Clearance to Overhead Lines.
Watercourses/ Waterbodies	50m	Best practice industry standard.
Roads	192.5m (Motorways, national & regional) 82.5m (Local)	Draft Guidelines require a turbine tip height plus 10% setback from motorways and national and regional roads.
Railways	192.5m	Draft Guidelines require a turbine tip height plus 10% setback from railways.
Airfields	1km	Best practice industry standard.
Existing Wind Farms	The Guidelines Section 5.13 - Windtake (7 x RD in prevailing wind direction & 3 x RD in crosswind direction)	Sites no longer available.
Small areas	Areas must be greater than $0.5km^2$ in area, or must be areas of viable area in close proximity which cumulatively are greater than $0.5km^2$	Small areas are generally not commercially viable.

8.2 Step 1: County Kilkenny

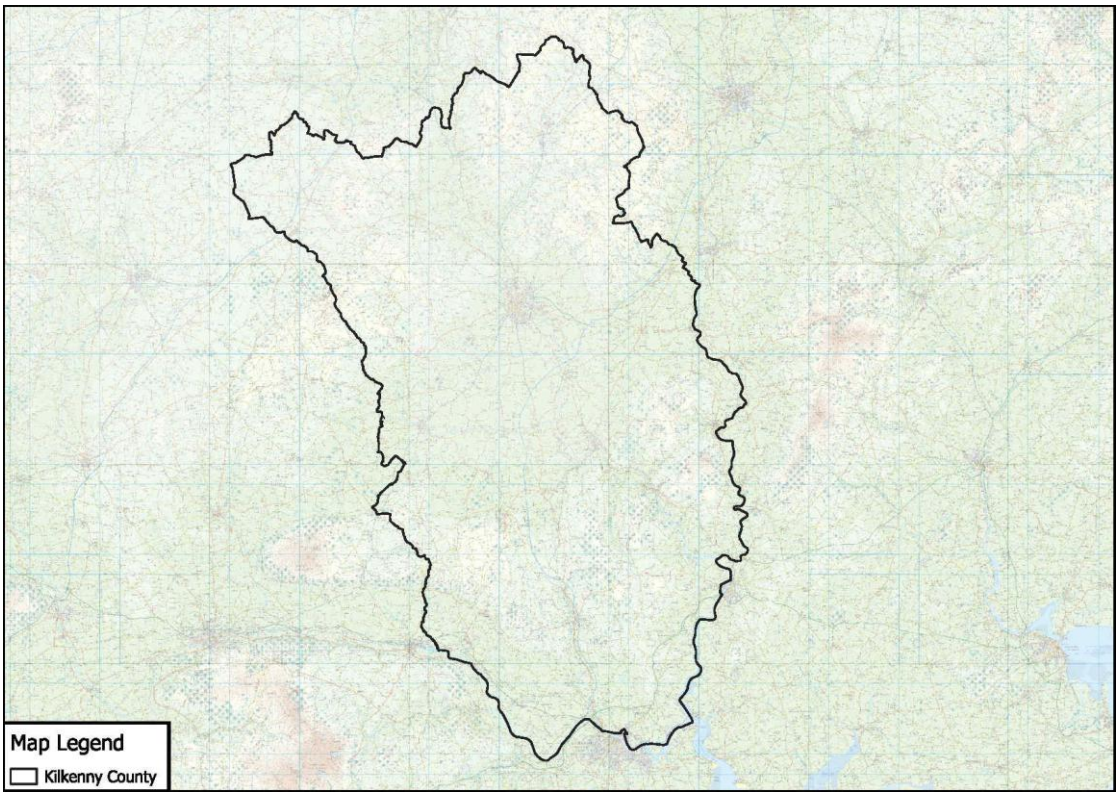


Figure 8-2 County Kilkenny

County Kilkenny
Area: 2073km^2

Using the area, (2073km^2) of the County as 100% of the area available for wind energy development, the capacity assessment eliminates in a step wise sequence areas which are subject to constraints set out in Table 8-1 and thus make that area not available for potential wind energy development.

8.3 Step 2: Wind Energy Strategy Areas

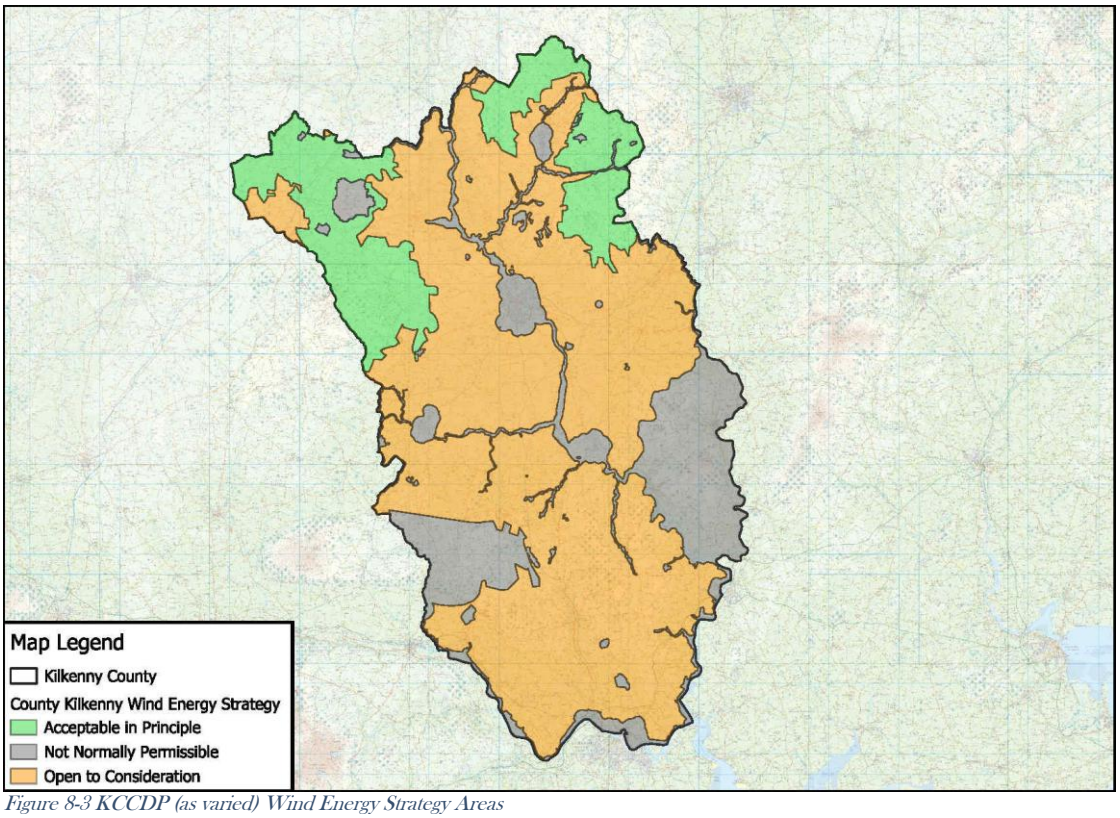


Figure 8-3 KCCDP (as varied) Wind Energy Strategy Areas

Wind Energy Strategy Area	Area	% of County
Acceptable in Principle	1668km^2	80%
Open to Consideration		
Not Normally Permissible	405km^2	20%

The Wind Strategy Areas as defined in the KCCDP (as varied) are applied to the County. Favourable policy areas, i.e. those areas that are zoned for new wind energy development (Acceptable in Principle, and Open to Consideration) account for 80% of the county. Unfavourable policy areas, i.e. those areas where new wind energy development is not envisaged (Not Normally Permissible) account for 20% of the County.

8.4 Step 3: Housing Constraint

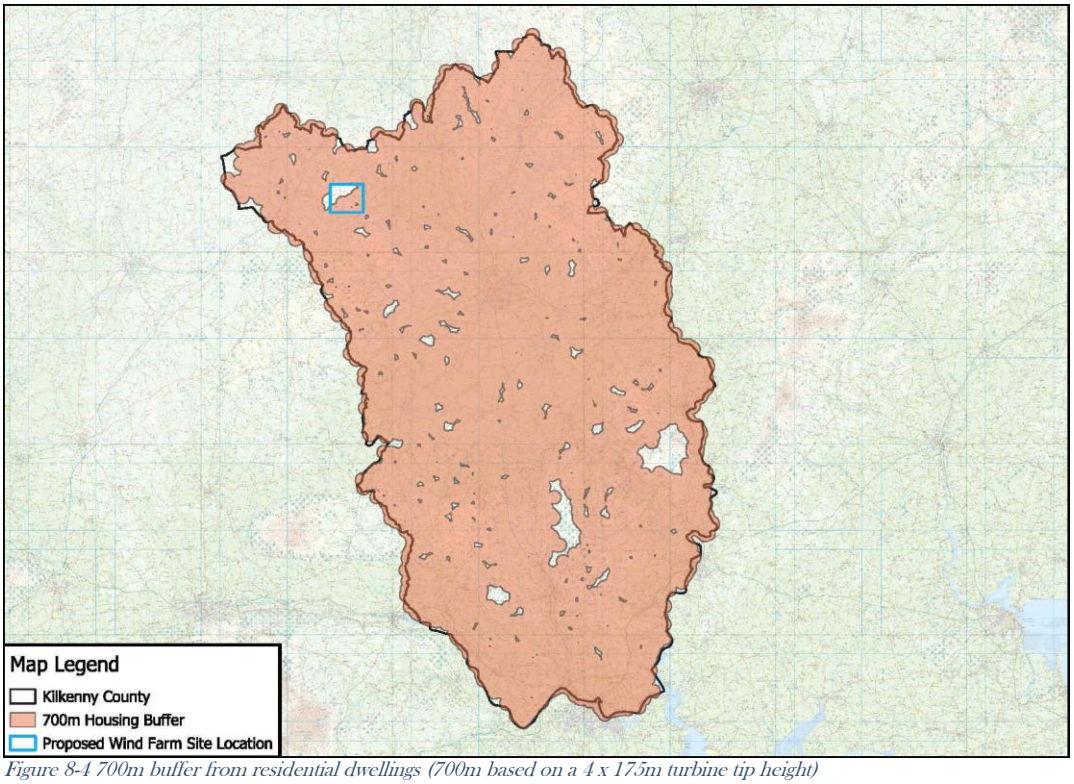


Figure 8-4 700m buffer from residential dwellings (700m based on a 4 x 175m turbine tip height)

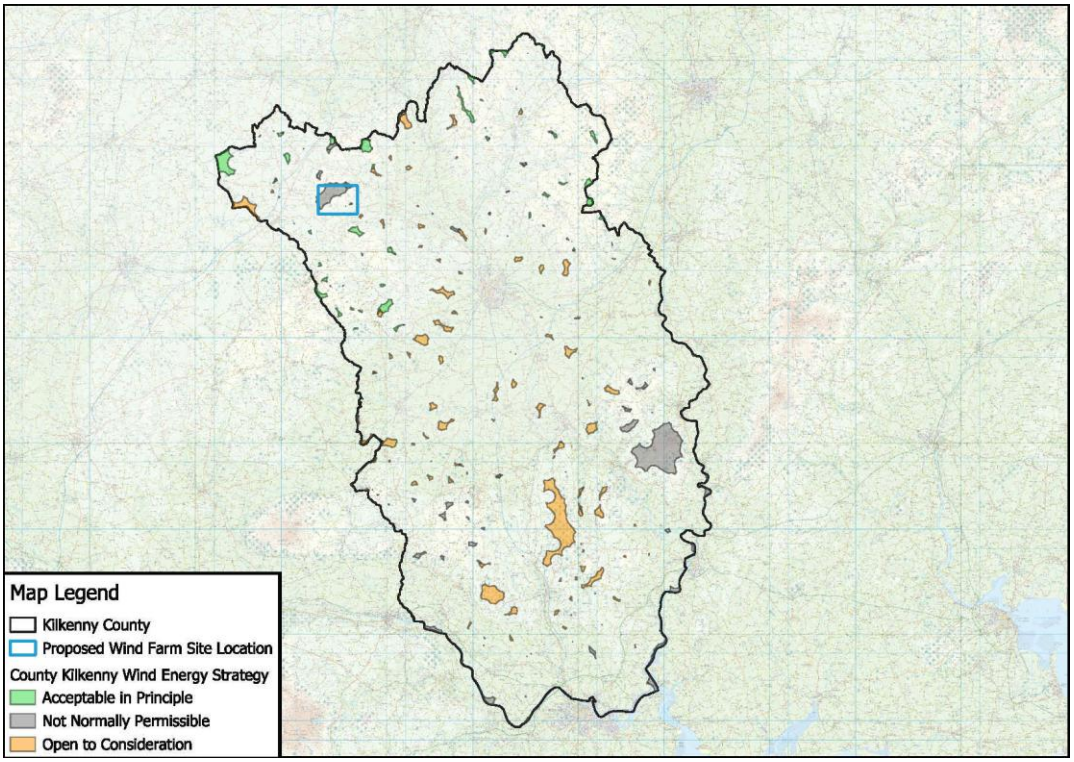


Figure 8-5 Remaining viable area after housing buffer is applied

Wind Energy Strategy Area	Area remaining following housing constraint	% of County
Favourable	48km^2	2.31%
Unfavourable	30km^2	1.47%

8.5 Step 4: Transport Corridors and Grid Constraints

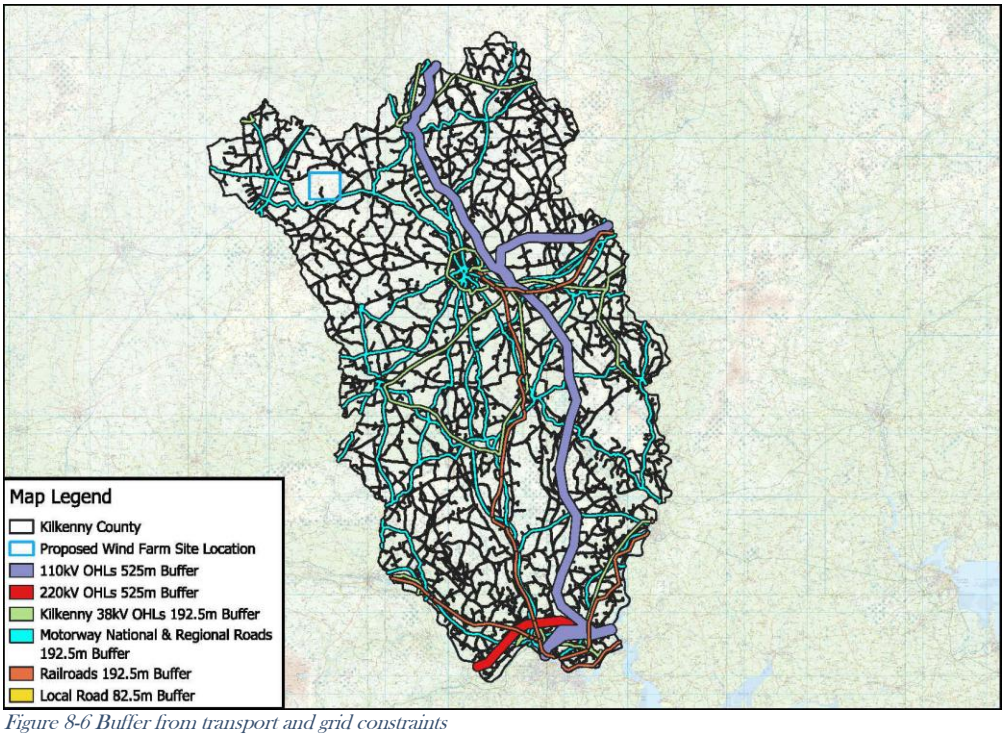


Figure 8-6 Buffer from transport and grid constraints

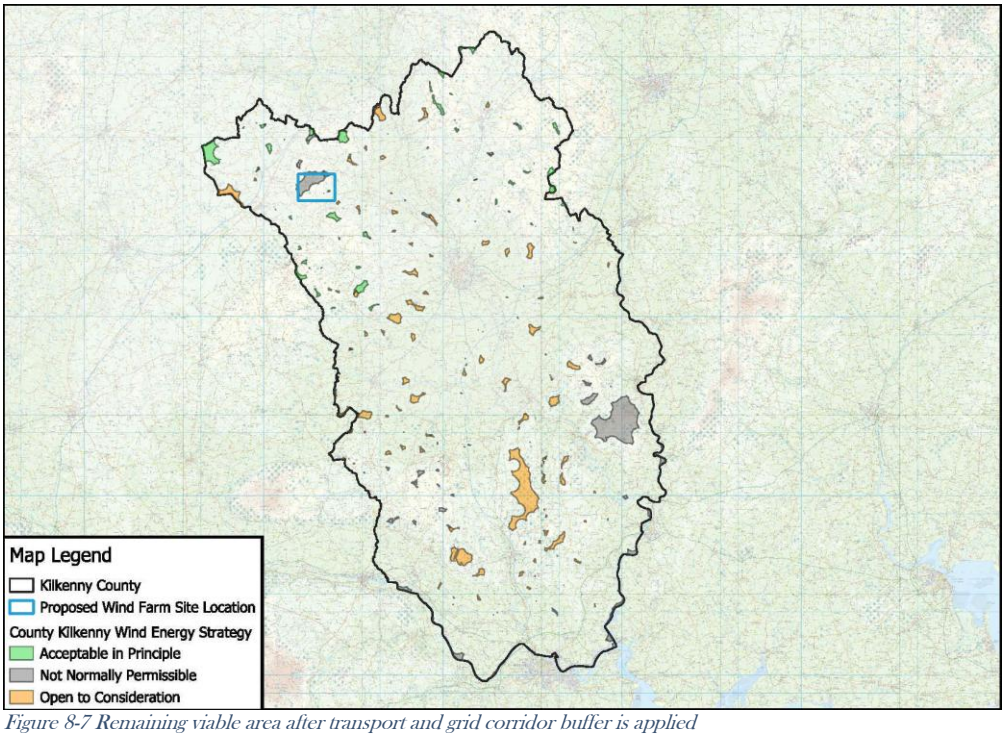


Figure 8-7 Remaining viable area after transport and grid corridor buffer is applied

Wind Energy Strategy Area	Area remaining following Transport Corridors and Grid Constraints	% of County
Favourable	46km^2	2.20%
Unfavourable	30km^2	1.43%

8.6 Step 5: Watercourses and Waterbodies

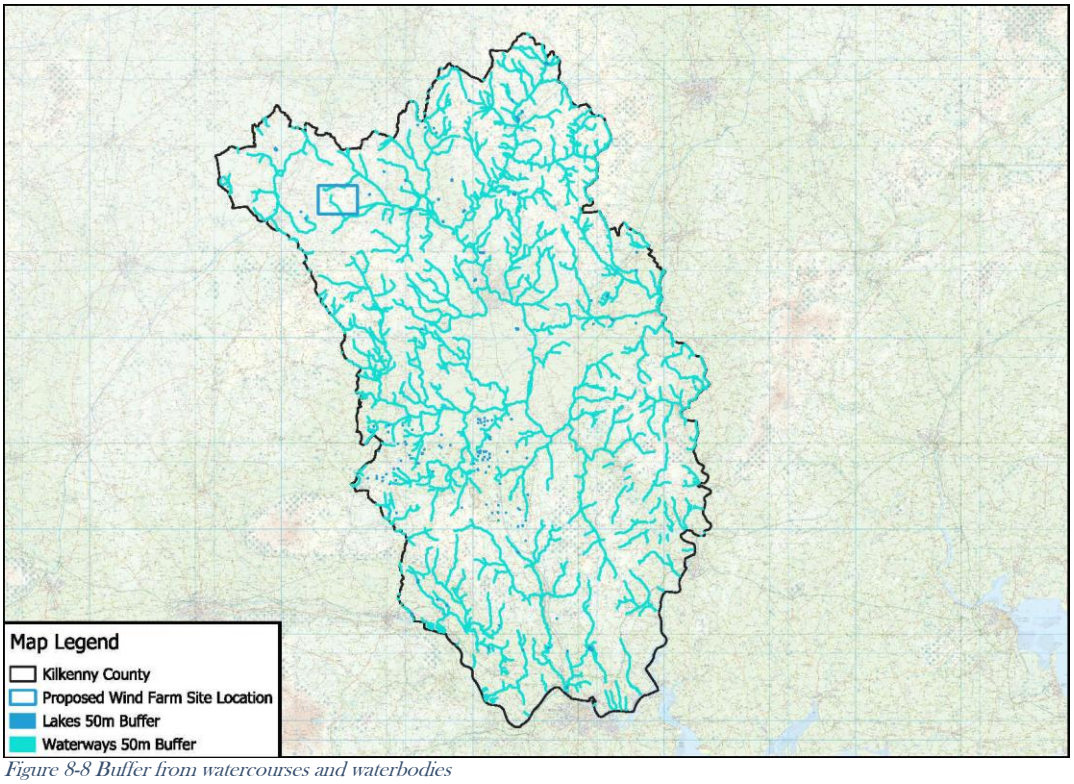


Figure 8-8 Buffer from watercourses and waterbodies

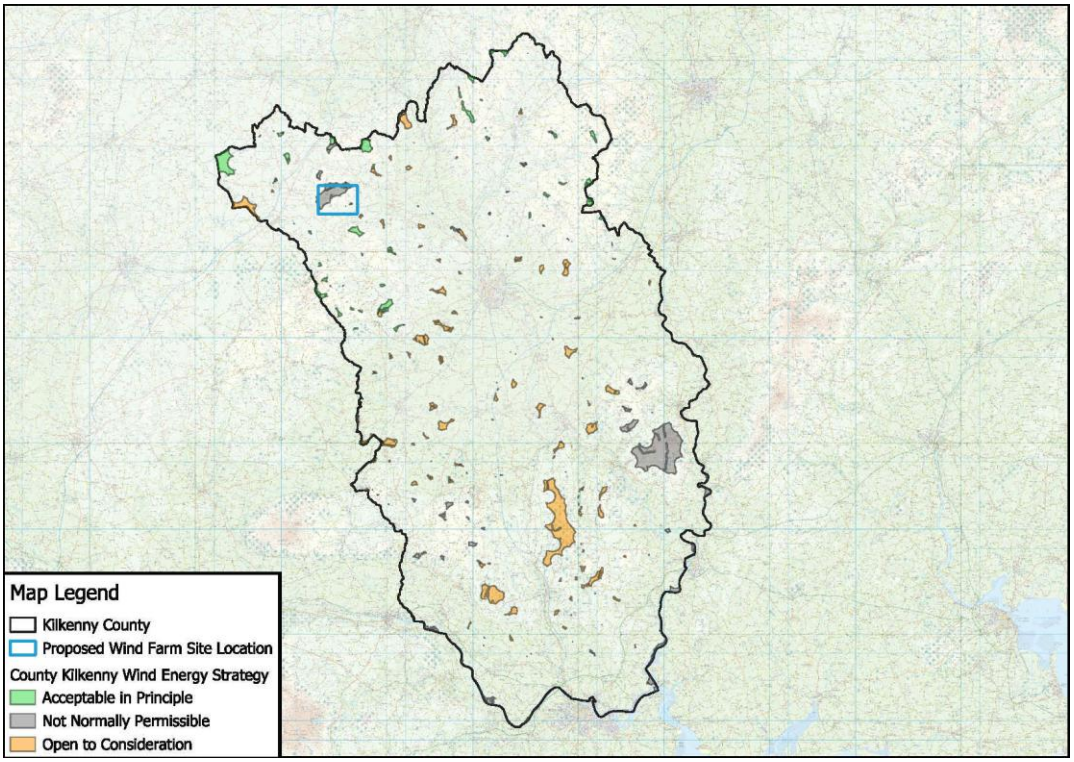


Figure 8-9 Remaining viable area after water constraints are applied

Wind Energy Strategy Area	Area remaining following waterbodies constraint	% of County
Favourable	43km^2	2.06%
Unfavourable	28km^2	1.33%

8.7 Step 6: Designated Sites

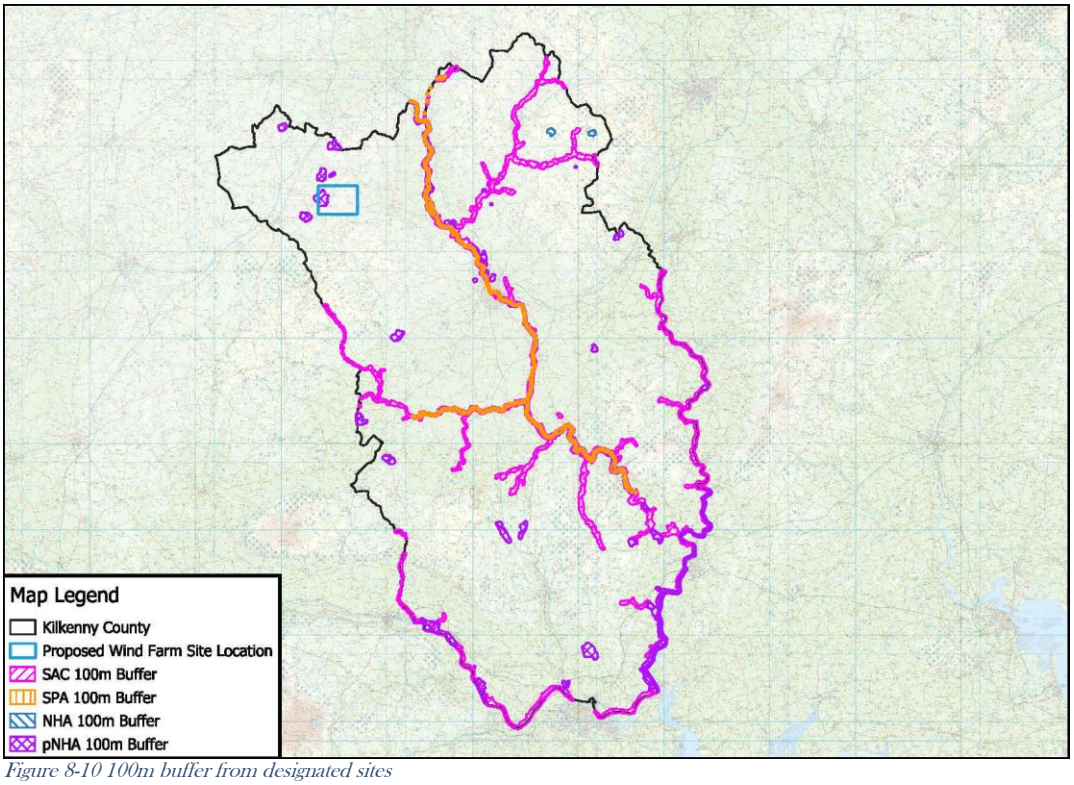


Figure 8-10 100m buffer from designated sites

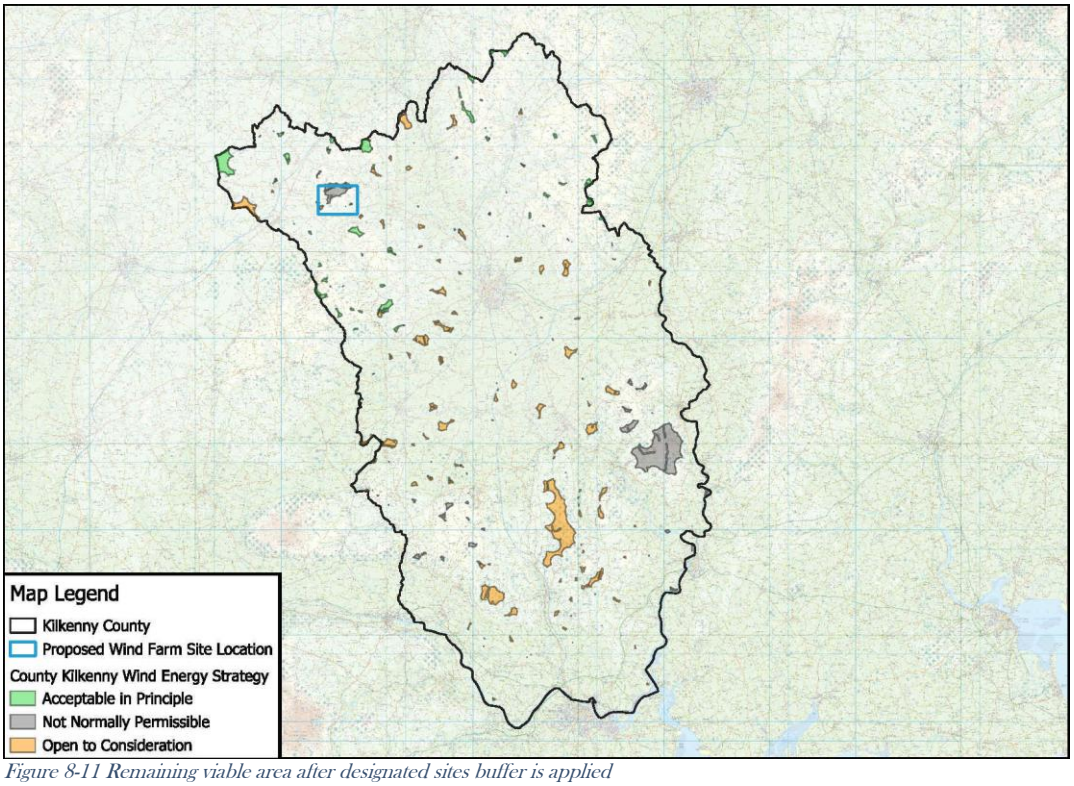


Figure 8-11 Remaining viable area after designated sites buffer is applied

Wind Energy Strategy Area	Area remaining following designated sites constraint	% of County
Favourable	42km^2	2.04%
Unfavourable	22km^2	1.06%

8.8 Step 7: Existing and Permitted Wind Farms

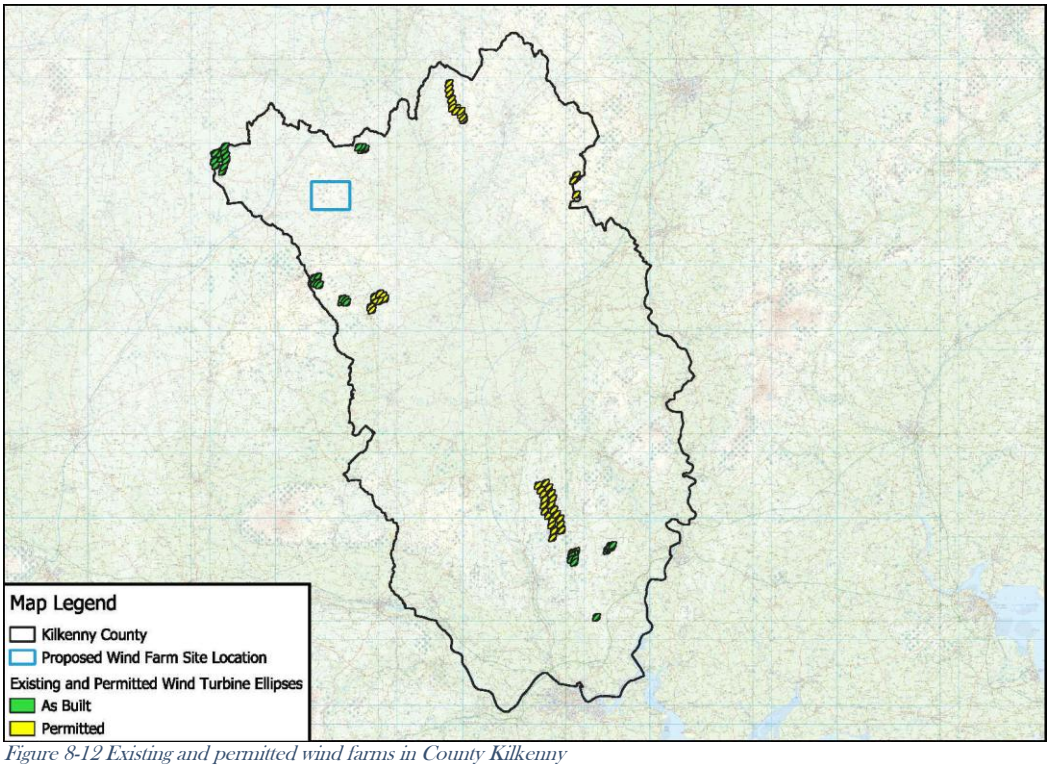


Figure 8-12 Existing and permitted wind farms in County Kilkenny

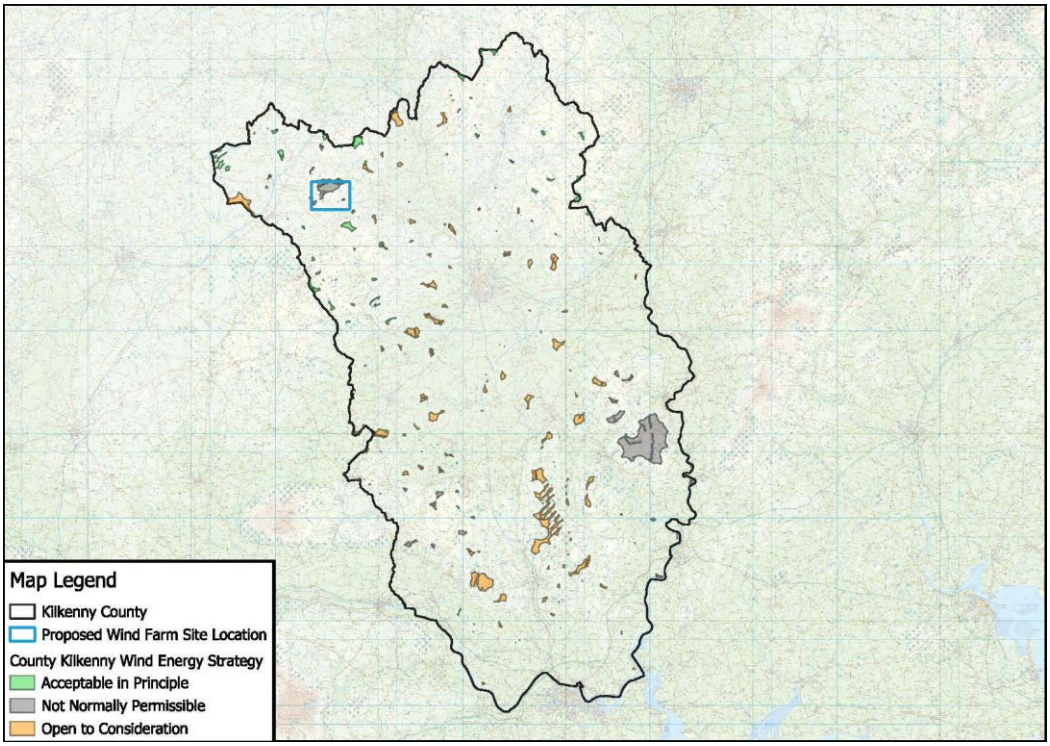


Figure 8-13 Remaining viable area after existing and permitted wind farms are removed

Wind Energy Strategy Area	Area remaining following existing and permitted wind farms constraint	% of County
Favourable	32km^2	1.56%
Unfavourable	22km^2	1.06%

8.9 Step 8: Small Areas Filter

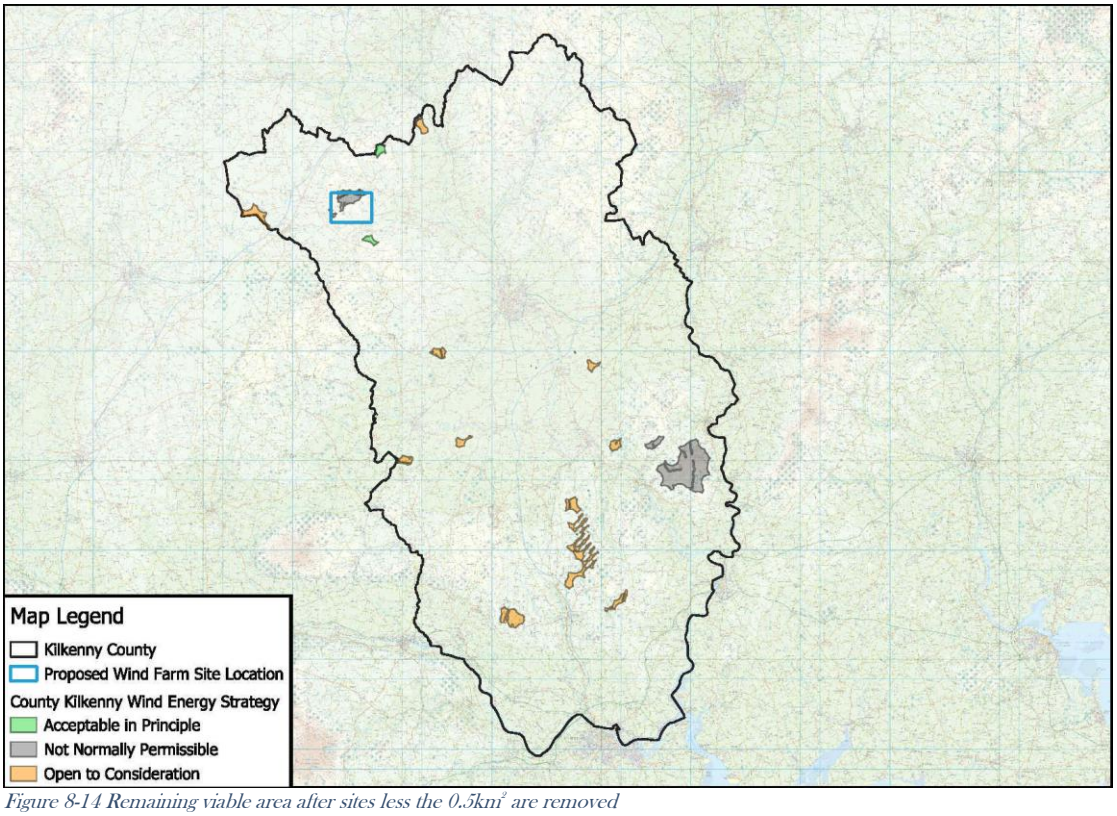


Figure 8-14 Remaining viable area after sites less the 0.5km² are removed

Wind Energy Strategy Area	Area remaining following small areas filter	% of County
Favourable	19km²	0.90%
Unfavourable	20km²	0.95%

8.10 Actual Viable Area

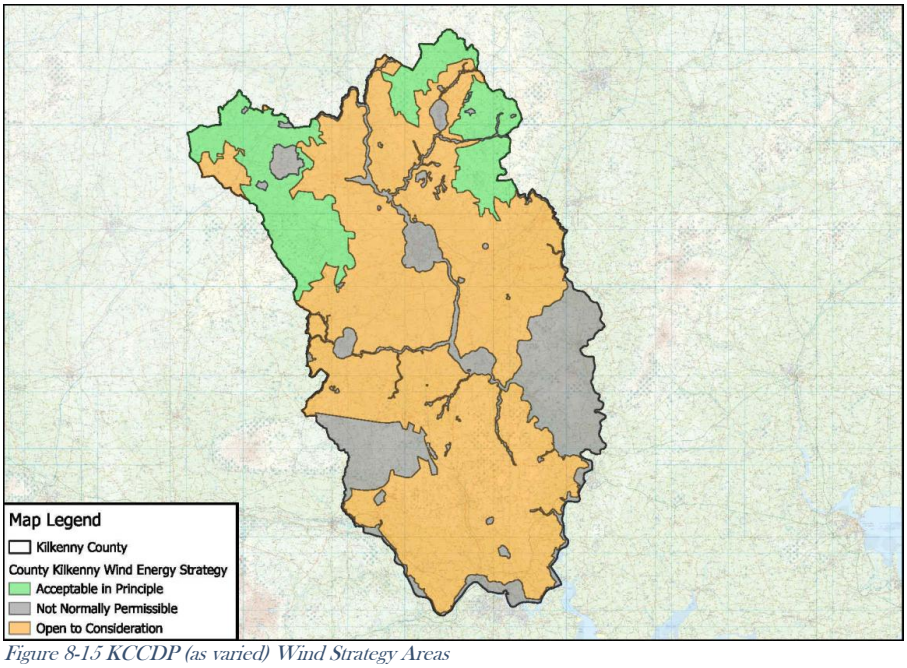


Figure 8-15 KCCDP (as varied) Wind Strategy Areas

Wind Energy Strategy Area	Area	% of County
Acceptable in Principle	1668km^2	80%
Open to Consideration		
Not Normally Permissible	405km^2	20%

Vs.

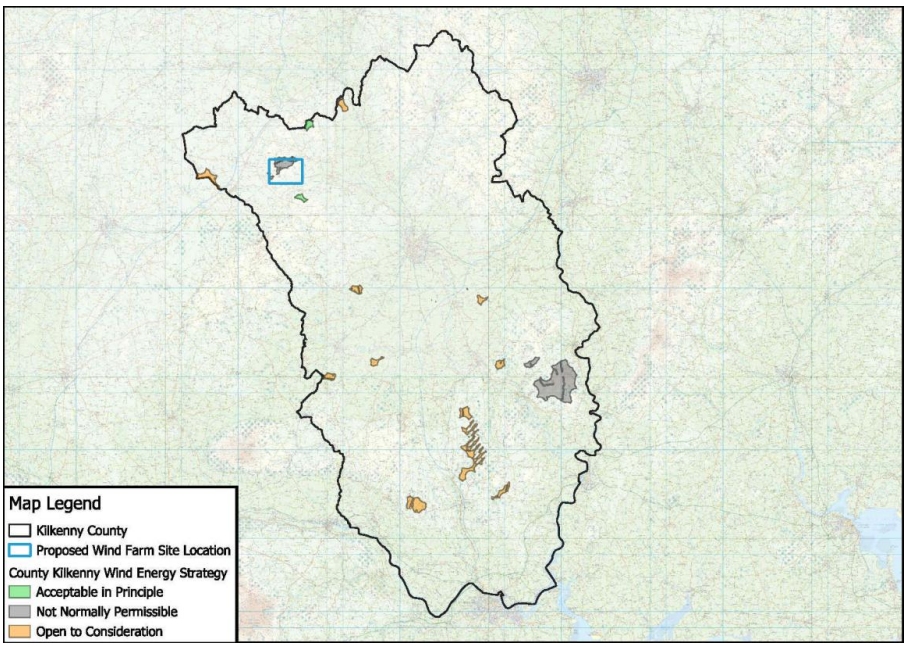


Figure 8-16 Actual remaining viable area

Wind Energy Strategy Area	Area remaining with constraints considered	% of County
Favourable	19km^2	0.90%
Unfavourable	20km^2	0.95%

8.11 Area Remaining for New Wind Energy Development

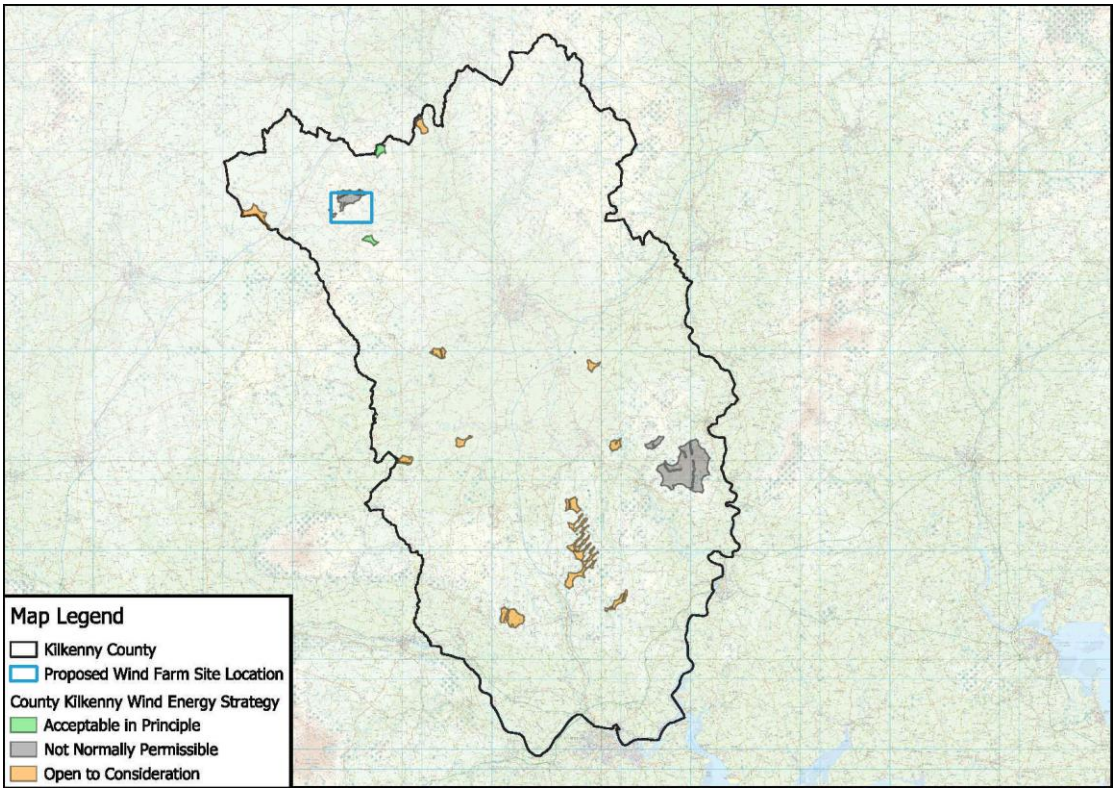


Figure 8-17 Remaining viable area with favourable and unfavourable KCCDP (as varied) Wind Energy Strategy Areas

Wind Energy Strategy Area	Area remaining with constraints considered	% of County
Favourable	19km^2	0.90%
Unfavourable	20km^2	0.95%

As can be seen in the maps above, the favourable KCCDP (as varied) Wind Strategy Areas zoned 'Acceptable in Principle' and 'Open to Consideration' are vastly reduced once project level constraints are applied. Once these buffers and constraints are applied, we find that only 0.90% (19km^2) of the County is actually available within these areas designated for new wind energy development projects. In relation to unfavourable KCCDP (as varied) Wind Strategy Areas zoned 'Not Normally Permissible', we find that 0.95% (20km^2) of the County is available within this area.

8.12 Wind Energy Capacity Assessment and Wind Energy Targets

From the wind energy capacity assessment carried out above, it is found that only 0.90% (19km^2) of County Kilkenny has both:

- A favourable wind energy zoning as per the KCCDP (as varied) Wind Energy Strategy Areas ('Acceptable in Principle' or 'Open to Consideration') and,
- Potential for wind energy development when project level constraints are applied.

The KCCDP (as varied) show 80% or 1668km^2 of County Kilkenny as having a favourable zoning for wind energy development as per the Wind Energy Strategy Areas, including both 'Acceptable in Principle' and 'Open to Consideration' areas. However, this representation significantly overestimates the actual quantum of land viable for wind energy development in the favourably zoned areas. This assumption in the KCCDP (as varied) is compared to the findings of the wind energy capacity assessment in Table 8-2 below.

Table 8-2 KCCDP (as varied) Wind Energy Strategy Areas compared to MKO wind energy capacity assessment findings

Wind Energy Strategy Area	KCCDP (as varied)	MKO Wind Energy Capacity Assessments	% Decrease
Acceptable in Principle	1668km^2	19km^2	-98.86%
Open to Consideration			

The overestimation of the quantum of viable land within these favourably zoned areas inflates the estimated potential yield from the favourably zoned areas. From MKO's vast experience in the renewable energy sector, operational wind farms typically accommodate installed generating capacities of approximately 10MW per km^2 of viable area. The table below considers the findings of the wind energy capacity assessment and a generating capacity of 10MW per km^2. It is acknowledged that in some circumstances a higher MW output per km^2 may be achieved, however the 10MW km^2 used for the purposes of this wind energy capacity assessment is considered reasonable.

Table 8-3 Capacity of favourable KCCDP (as varied) Wind Energy Strategy Areas as of MKO wind energy capacity assessment

MKO Wind Energy Capacity Assessments	MKO Wind Energy Capacity Assessments	10MW per km2
Acceptable in Principle	19km^2	190MW
Open to Consideration		

As shown in Table 8-3, the estimated capacity of all viable and favourably zoned lands in the County is just 190MW which falls short the 253MW installed capacity target required to meet the strategic aim in the KCCDP to ensure that 100% of electricity demand for Kilkenny is met from renewable sources by 2030.

Moreover, this capacity assessment presented in Tables 8-2 and 8-3 assumes that all viable favourably zoned sites identified in the assessment are developed for wind energy. However, in reality the probability of all the viable and favourably zoned sites being developed for wind energy is very low from MKO's vast experience in the renewable energy sector. The graphic provided in Figure 8-18 below is intended to illustrate the concept of project attrition, where for example, four fifths (80%) of potential sites successfully pass through each stage in the wind farm development cycle.

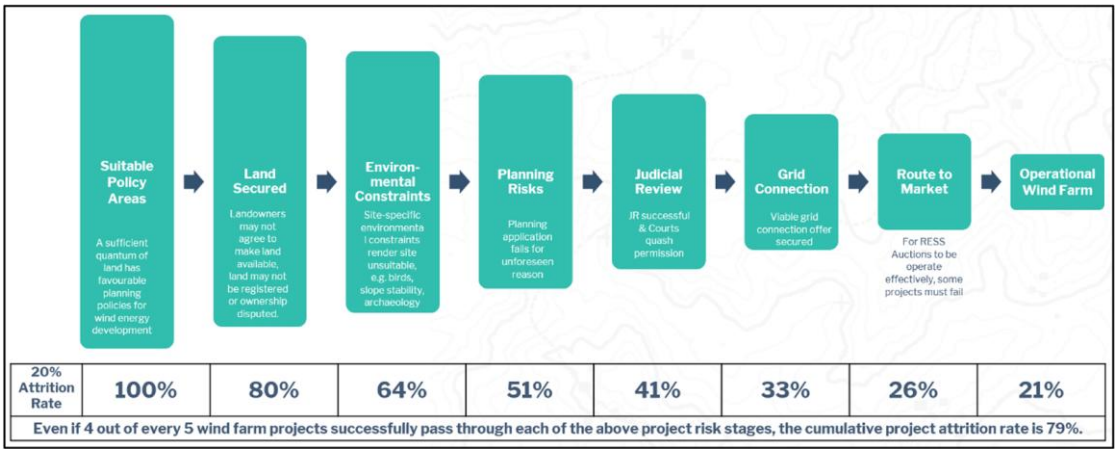


Figure 8-18 Wind Farm Project Attrition

It is acknowledged that new wind energy generating capacity may be installed on existing wind farm sites through repowering or extensions. However, the Wind Energy Ireland (WEI) Repowering Ireland report (June 2024) identified that across Ireland a total of 76 no. operational wind farms with an installed capacity of 854 MW will reach the end of their operational lifetime and will be decommissioned by 2030, unless re-powered or extended. By 2040, this figure will rise cumulatively to 201 wind farms with an installed capacity of 2,488 MW[9]. The report identified that a large proportion of operational wind farms will not be able to retain their existing installed capacity if repowered due to design, planning and environmental constraints and that only 65% of operational wind farms are located in favourably designated areas for wind energy development.

It is clear from the assessment that for County Kilkenny to effectively contribute to National climate and renewable energy targets, viable areas outside of the AIP and OTC areas as identified in the KCCDP must be considered such as the Proposed Development Site. Specifically, the achievement of the following climate and renewable energy targets at National, Regional and local level is reliant on the provision of a sufficient supply of viable land for wind energy development across the State including in Kilkenny:

- Legally binding objective for Ireland to achieve net-zero emissions no later than 2050, and to a 51% reduction in emissions by the end of this decade as set out in the Climate Act,
- National targets of 9GW of electricity from onshore wind and 80% renewable energy share by 2030 as set out in the CAP25,
- The Southern Region's allocated target of installing an additional 978 MW of onshore wind energy, by 2030 as set out in the revised NPF, and
- County Kilkenny's strategic aim of generating 100% of their electricity demand, equivalent to installing 253MW of renewable energy generating capacity.

The wind energy capacity analysis demonstrates that it is only possible for County Kilkenny to reach its renewable energy capacity target (of 253MW) if viable areas outside of AIP and OTC areas are considered. Given the urgency of national climate and energy targets, it is imperative that all viable sites within the county are considered for wind energy development. As such, every site brought forward for wind energy development needs to be assessed on the individual merit and suitability of the site for wind energy, regardless of its wind energy classification.

[9] *https://windenergyireland.com/images/files/final-repowering-ireland-report-june-2024.pdf*

9. PLANNING ASSESSMENT

The Proposed Project has been subject to a rigorous design process informed by a comprehensive planning and environmental assessments and surveys, which have collectively concluded that the proposal is in line with proper planning and sustainable development of the area. The Proposed Project has been designed in compliance with the Guidelines and it has been demonstrated that the requirements of the Draft Guidelines can also be achieved.

There are no significant environmental impacts associated with the Proposed Project with the exception of a Significant' residual landscape and visual effects identified in Chapter 13 in relation to Clomantagh Hillfort, however, these effects are localised and do not involve any direct alteration to the physical fabric of the hillfort. In all instances, the Proposed Project exceeds the recommended 500m set back distance in the Guidelines and also is in line with the 4 times tip height set-back distance (in this case 740m) set out for residential visual amenity prescribed by the Draft Guidelines. The Proposed Project will not have any significant effects on any European Sites.

9.1 Strategic Need for the Proposed Project

The global climate is breaking down as a result of greenhouse gas emissions from the burning of fossil fuels. News stories of climate change-related extreme weather events are now a constant in the daily news cycle. According to the World Meteorological Organisation's '*State of the Global Climate 2025'* published in March 2026[10], atmospheric concentration of CO_2 in 2024 reached the highest levels in the last 2,000,000 years, and methane and nitrous oxide reached their highest levels in the last 800,000 years. The annual carbon dioxide concentration increase in 2024 was the largest increase since 1957, when modern measurements began. The report also states that the year 2024 was the warmest year on observational record, with temperatures at 1.55 °C ± 0.13 °C above the 1850–1900 average.[11]. The year 2025 was the second or third warmest year (depending on the datasets used) in the 176-year record[12].

The European State of the Climate Report 2024 produced by World Meteorological Organisation and European Union[13] reported that:

- Global average values of surface air and sea surface temperatures have increased significantly since the pre-industrial era, by around 1.3°C to 1.4° C and 1°C, respectively.
- Since 1999, an average sea level rise of around 3.7mm globally and 2mm-4mm in the European region has been observed.
- A record increase in CO2 (+2.4 ppm) and methane (+12 ppb) has been observed since 2020.
- Glaciers in Scandinavia and Svalbard recorded the highest annual rates of mass loss.
- In 2024, Europe experiences the most widespread flooding since 2013.

The impacts of climate change are currently being felt, the severity of which is expected to increase with further greenhouse gas emissions. Ireland's Climate 2024 Provisional Summary Report produced by Met Éireann[14], reflects clear and distinct impacts arising from climate change in Ireland:

- 2024 was noted to be the fourth warmest year on record in Ireland with an average temperature of 10.72°C.
- Further precipitation changes are expected, with a 9% potential decrease in the summer, causing water shortages and impacting agriculture, and a 24% potential increase in winter, elevating the risk of flooding in various regions.
- Seven named storms impacted Ireland in 2024, with Storms Isha and Darragh both producing particularly violent storm-force winds.

[10] *State of the Global Climate 2025 (World Meteorological Organisation, March 2026)*
[11] *State of the Global Climate 2025 (World Meteorological Organisation, March 2026)*
[12] *State of the Global Climate 2025 (World Meteorological Organisation, March 2026)*
[13] *The European State of the Climate Report 2024 (World Meteorological Organization and European Union, April 2025)*
[14] *Ireland's Climate 2024 Provisional Summary Report (Met Éireann, March 2025)*

To mitigate climate change, Ireland must decarbonise its economy by 2050. There is an urgency to ensure that real changes occur without delay, which means that a gradual shift towards increasing Ireland's use of renewable energy generation is no longer viable. Over the last 25 years, Ireland has become a world leader in onshore wind energy, with a total of 41.8%% of the Ireland's gross electricity supply from onshore wind in 2024[15]. As a country, Ireland only became a world leader by consenting and building one wind farm at a time.

Since 1992, Ireland has installed 5,000 MW of onshore wind. Now, with the 2025 Climate Action Plan requiring the amount of onshore wind energy to increase from 5,000 MW to 9,000 MW by 2030, Ireland must install almost double its existing capacity in just under 5 years. To reach this target, hundreds of additional wind farms will have to be connected to the national grid over the rest of this decade. The scale of Ireland's challenge was quantified in the 2024 Climate Action Plan, which states that *'To achieve the necessary emissions abatement, an approximately* ***eight times increase*** *of renewable energy deployment to* ***2.3 GW*** *annually would be needed between* ***2024 and 2030.'*** (emphasis added)

The latest climate and energy reports all make one message abundantly clear; Ireland is not acting fast enough. If a major step up in renewable energy deployment levels does not occur, Ireland will fail to reach its renewable energy target and will exceed its carbon budgets. The EPA report *Ireland's Greenhouse Gas Emissions Projections 2024-2055* (May 2025) highlights that Ireland is not on track to meet its national target of 51% emissions reduction target by 2030 compared to 2018 as required under the Climate Act, nor is the country projected to meet its EU target of 42% emissions reduction compared to 2005 under the Effort Sharing Regulations. Similarly, the Climate Change Advisory Council make clear that *'progress to reduce emissions is not sufficient for Ireland to meet its national and EU climate obligations'*[16].

As a nation, Ireland is legally bound to its climate targets. The Climate Act legally binds Ireland to achieve net-zero emissions no later than 2050, and to a 51% reduction in emissions by the end of this decade. Section 15(1) of the Climate Act requires public bodies (including the planning authorities) to carry out its functions consistently, insofar as practicable, with specified climate plans and objectives, including the latest, which includes CAP25.

Ireland is also legally bound by renewable energy targets at a European level. The latest revision of the Renewable Energy Directive (RED III) introduced a binding EU-wide target for overall Renewable Energy Share (RES) of at least 42.5% by 2030 and requires Member States to set their national contributions to the EU-wide target. In accordance with RED III and the revised RES target, the Department of the Environment, Climate and Communications have published an updated National Energy and Climate Plan 2021-2030 in July 2024. The updated NECP committed to achieving a 43% share of renewable energy in total energy consumption by 2030. The updated NECP states that Ireland's proposed trajectory will not be in line with the desired trajectory set out in the Governance Regulation (Regulation 2018/1999).

Every viable renewable energy project plays a crucial role in meeting Ireland's climate targets. The approval of well-planned, appropriately located renewable energy projects, such as the Proposed Project is not just beneficial, it is imperative. Without decisive action to facilitate renewable energy deployment, Ireland risks missing national and EU commitments, incurring financial penalties, and undermining energy security.

9.2 Compliance with Planning Policy

The provision of renewable energy developments such as the Proposed Project is strongly supported by European, national, regional and local policies and guidelines aimed at achieving the transition to a low carbon and climate resilient economy, increasing renewable energy generation, and enhancing energy security. Specifically, the Proposed Project will contribute to achieving the target of generating 9GW of electricity from onshore wind and 80% renewable energy share by 2030 as set out in the CAP25. The comprehensive suite of European, national, regional and local policy support for wind energy,

[15] *https://www.seai.ie/sites/default/files/publications/Energy-in-Ireland-2025.pdf*
[16] *https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC-AR-2024-SfA-final.pdf*

demonstrates that the principle of the Proposed Project at this location is acceptable and suitable for wind energy development.

At a European level, the Proposed Project will support Ireland in reaching its legally binding obligations as an EU Member State of achieving at least 42.5% renewable energy by 2030, as set out in REDIII. Furthermore, the RePowerEU plan aims to increase energy security within the EU and increase the share of renewable energy onto the EU electricity grid by *'Speeding up renewables permitting to minimise the time for roll-out of renewable projects and grid infrastructure improvements'.*

The Proposed Project aligns with National Strategic Outcome 8 and Objectives outlined in the Revised NPF, particularly Objective 70, which seeks 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. The Proposed Project will contribute to the substantial Regional Renewable Electricity Capacity Allocation for the Southern Region.

Regionally, the Proposed Project will support the future growth of renewable energy technology in the Southern Region as called for in the RSES which sets a clear precedent to identify and capitalise on those opportunities associated with the transition to renewable energy generation.

Locally, the KCDP (as varied) is supportive of renewable energy development as it sets out the need for Kilkenny to transition to a low-carbon and climate-resilient County with a focus on renewable energy to increase the County's energy sustainability and security. Specifically, a strategic aim of the KCDP (as varied) is to transition to a competitive, low-carbon, climate-resilient and environmentally sustainable economy, the Proposed Project will support the KCDP (as varied) in this aim. Compliance with all relevant policies within the KCDP (as varied) is demonstrated in Table 7-2, Table 7-3 and Table 7-4 above.

In summary, the Proposed Project provides the opportunity to significantly contribute to energy and climate targets in a manner which is in accordance with planning policy at all levels.

Considering the 2021 Draft Ministerial Direction, the findings of the County-wide wind energy capacity analysis (in Section 8) and the findings of the EIAR and NIS, it is submitted that Proposed Development which constitutes a large-scale wind energy development under the extant provisions of the KCCDP 2014-2020 is in accordance with the provisions of proper planning and sustainable development due to the suitability of the site and the urgent need for renewable energy development of this scale.

9.3 Compliance with Legislation

This planning application has been prepared in accordance with Section 37 of the Planning Act. Pre-application consultation with the Commission was undertaken in accordance with Section 37A and the application has been prepared in accordance with the requirements for an application under Section 37E, including the requirements under REDIII.

The Proposed Project is also consistent with the Climate Act and the legal requirement for the State to achieve a 51% reduction in emissions by 2030.

The application for development permission is accompanied by an EIAR and NIS in accordance with the requirements of the Planning Act and the Planning and Development Regulations 2001, as amended.

9.4 EIAR Findings

The purpose of the EIAR is to document the current state of the environment on and in the vicinity of the Proposed Project site and to determine the likely significant effects of the Proposed Project on the environment and where mitigation measures may be required.

The findings of the EIAR and the mitigation measures set out within the documents demonstrates the Proposed Project will be capable of being constructed, operated and decommissioned without likely significant effects on the environment with the exception of a Significant' residual landscape and visual

effects identified in Chapter 13 in relation to Clomantagh Hillfort, however, these effects are localised and do not involve any direct alteration to the physical fabric of the hillfort. It should be noted that in all instances, the Proposed Project exceeds the recommended 500m set back distance in the Guidelines and also is in line with the 4 times tip height set-back distance (in this case 740m) set out for residential visual amenity prescribed by the Draft Guidelines.

Section 5.7 and 5.10 in Chapter 5 of the EIAR present as assessment on property values which concludes as follows: *'As noted in Section 5.7.1 above, the available scientific literature demonstrates that there is insufficient evidence and studies conducted to determine that there is the potential for a significant effect on property values as a result of the Proposed Wind Farm. The impact assessment on property values outlined below takes a precautionary approach and assumes that based on the inconclusive evidence summarised above in Section 5.7, there is the potential for short-term, slight, negative impacts on property values located within 1km of the Proposed Turbines during the construction phase of the Proposed Wind Farm.'*

9.5 NIS Findings

The NIS provides an assessment of all potential direct or indirect adverse effects on European Sites.

Where the potential for any adverse effect on any European Site has been identified, the pathway by which any such effect may occur has been robustly blocked through the use of avoidance, appropriate design and mitigation measures as set out within this report and its appendices. The measures ensure that the construction and operation of the Proposed Project do not adversely affect the integrity of European sites.

Therefore, it can be objectively concluded that the Proposed Project, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site.

9.6 Principle of Development

There exists a comprehensive platform of policy support for wind energy at a European, national, regional and local level that supports the principle of renewable energy development at the site to be acceptable at this location.

The Proposed Project is in accordance with and has the support of European, national, regional policies pertaining to achieving the transition to a low-carbon economy, climate resiliency, increasing renewable energy generation, and enhancing energy security.

At a local level, the Proposed Project is in line with the KCDP (as varied), as it identifies the need for Kilkenny to transition into a low-carbon and climate-resilient County. The Proposed Project will contribute to a strategic aim of the KCDP (as varied) to transition to a competitive, low carbon, climate resilient and environmentally sustainable economy. The wind energy capacity analysis in Section 8 above demonstrates that it is only possible for County Kilkenny to reach its renewable energy capacity target (of 253MW) under the current wind energy zoning set out in the KCCDP if viable areas outside of AIP and OTC areas are considered. Given the urgency of national climate and energy targets, it is imperative that all viable sites within the county are considered for wind energy development. As such, every site brought forward for wind energy development needs to be assessed on the individual merit and suitability of the site for wind energy, regardless of its wind energy classification.

As concluded in the EIAR, the Proposed Project has been thoroughly assessed and with the mitigation measures outlined in the EIAR in place the Proposed Project will be capable of being constructed, operated and decommissioned without likely significant effects on the environment with the exception of a Significant' residual landscape and visual effects identified in Chapter 13 in relation to Clomantagh Hillfort, however, these effects are localised and do not involve any direct alteration to the physical fabric of the hillfort.

Similarly, as concluded in the NIS, all potential effects arising from the Proposed Project have been mitigated to the extent that there is no potential for adverse effects on the integrity of any European Site, as a result of the Proposed Project.

A detailed County-wide wind energy capacity analysis has been prepared as part of this application and is detailed in Section 8 of this report which demonstrates that it is only possible for County Kilkenny to reach its renewable energy capacity target (of 253MW) if viable areas outside of the mapped AIP and OTC Wind Strategy Areas (in Figure 11.4 of the KCCDP) are considered. Given the urgency of national climate and energy targets, it is imperative that all viable sites within the county are considered for wind energy development. As such, every site brought forward for wind energy development needs to be assessed on the individual merit and suitability of the site for wind energy, regardless of its wind energy classification. Refer to Section 8 below for details.

Considering the 2021 Draft Ministerial Direction, the findings of the County-wide wind energy capacity analysis and the findings of the EIAR and NIS, it is submitted that Proposed Development which constitutes a large-scale wind energy development under the extant provisions of the KCCDP 2014-2020 is in accordance with the provisions of proper planning and sustainable development due to the suitability of the site and the urgent need for renewable energy development of this scale.

As such the principle of development is considered to be acceptable and in accordance with proper planning and sustainable development.

10. CONCLUSION

The provision of the Proposed Project is strongly supported by European, national, regional and local policies and guidelines aimed at achieving the transition to a low-carbon and climate-resilient economy, increasing renewable energy generation, and enhancing energy security. Specifically, the Proposed Project will contribute to achieving the target of generating 9GW of electricity from onshore wind and reducing greenhouse gas emissions by 80% by 2030 as set out in the CAP25.

The Proposed Project aligns with National Strategic Outcome 8 and Objectives outlined in the Revised NPF, particularly Objective 70, which seeks 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.

CAP25 highlights that "*a renewables-led system is at the core of Ireland's plan to radically reduce emissions in the electricity sector, protect our energy security, and ensure our economic competitiveness*". To achieve this, greater alignment between local plans and national and regional renewable energy policy and targets is urgently required. If permitted, the Proposed Project will add approximately 62MW of renewable, clean energy to Ireland's national wind energy capacity. This will not only contribute to the decarbonisation of the electricity sector but will play a role in the decarbonisation of other sectors and the transition to a low-carbon, climate-resilient economy. By harnessing indigenous wind resources and generating and providing renewable onshore wind energy, the Proposed Project will enhance Ireland's energy security by reducing reliance on imported fossil fuels.

It is acknowledged that, as a significant infrastructure project, the Proposed Project will have an impact on the receiving environment in which it is proposed. The application for the Proposed Project recognises the parallel interests of tackling climate change while aiming to safeguard residential amenity and to protect species and habitats. Consideration of this fact has been central to the design of the Proposed Project and in the preparation of the EIAR, NIS, and mitigation measures proposed. The EIAR demonstrates that, if consented, the Proposed Project will be capable of being constructed, operated and decommissioned without giving rise to any significant impacts on the environment with the exception of a Significant' residual landscape and visual effects identified in Chapter 13 in relation to Clomantagh Hillfort, however, these effects are localised and do not involve any direct alteration to the physical fabric of the hillfort.

Ultimately, it is considered that this Proposed Project is in accordance with the provisions of proper planning and sustainable development due to the suitability of the site and the urgent need for renewable energy development of this scale. National climate and renewable energy objectives, and the decarbonisation of Irish society as a whole is dependent on the rapid expansion of wind energy in Ireland. The scale of the challenge Ireland faces in decarbonising its economy is enormous, but the climate change implications of not doing so are even greater. The Proposed Project will support the decarbonisation of the electricity sector and the decarbonisation of other sectors, reducing reliance on imported fossil fuels for energy generation and enhancing Ireland's energy security.

Having regard to the key points set out in this Report, it is respectfully requested that the Commission considers the relevant planning context that applies, and grants permission for the Proposed Project which is the subject of this application.

