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Sean McKeown  
Chief Executive  
Kilkenny County Council  
County Hall  
John Street  
Kilkenny

19 December 2022

**Our Ref:** WHI001

**Your Ref:** --/--

Dear Sir,

**Location:** Ridge, Knocknabranagh and Knockbaun, Baunreagh, and Agharue, Co. Carlow; and Coolcullen, Cloneen and Coan East, Co. Kilkenny

**Re:** (i) 7 no. wind turbines with hub height of 104 metres, a rotor diameter of 162 metres and an overall tip height of 185 metres; (ii) all associated turbine foundations and crane hardstanding areas; (iii) all associated underground electrical and communications cabling; (iv) construction of internal wind farm access tracks; (v) construction of a site entrance from the L3037 local road and upgrades to 2 no. existing agricultural entrances from the L7122 local road; (vi) 1 no. guy-wired meteorological mast with an overall height of 30 metres; (vii) 1 no. temporary construction compound; (viii) 3 no. borrow pits which, when exhausted, will be utilised to permanently store excess excavated material; (ix) the storage, as required, of excavated material at 2 no. further dedicated spoil deposition areas; (x) change of use of existing residential dwelling to wind farm site office; (xi) felling of 15 hectares of commercial forestry plantation to facilitate the construction of wind farm infrastructure; (xii) the construction of a temporary access track (150m in length) between the N78 national road and L1834 local road; (xiii) Carriageway strengthening works at 'Black Bridge' on the L1835 and L3037; (xiv) all associated and ancillary site development, excavation, construction, landscaping and reinstatement works, upgrade works to public roads along the turbine component haul route, the provision of site drainage infrastructure and environmental mitigation measures; and (xv) a 35-year operational life from the date of commissioning of the entire proposed development.

**An Environmental Impact Assessment Report and Natura Impact Statement have been prepared in respect of the proposed development and accompany this planning application.**

## 1.0 Introduction

On behalf of our client, White Hill Wind Limited ('the Applicant'), please find enclosed a Strategic Infrastructure Development (SID) planning application for the abovementioned proposed development in accordance with Section 37E of the Planning and Development Act 2000 (as amended) ('the Act').

## 2.0 Pre-Application Consultation

The Applicant entered into pre-application consultations with An Bord Pleanála (Reference ABP-312224-21), pursuant to Section 37B. On 25 July 2022, An Bord Pleanála served notice of its determination that the proposed development constitutes SID and that a planning application for same must be made directly to it.

## 3.0 Description of the Proposed Development

The planning application seeks permission for a 10-year planning permission for a proposed development generally described as follows:-

- i. 7 no. wind turbines with hub height of 104 metres, a rotor diameter of 162 metres and an overall tip height of 185 metres;
- ii. All associated turbine foundations and crane hardstanding areas;
- iii. All associated underground electrical and communications cabling;
- iv. Construction of internal wind farm access tracks;
- v. Construction of a site entrance from the L3037 local road and upgrades to 2 no. existing agricultural entrances from the L7122 local road;
- vi. 1 no. guy-wired meteorological mast with an overall height of 30 metres;
- vii. 1 no. temporary construction compound;
- viii. 3 no. borrow pits which, when exhausted, will be utilised to permanently store excess excavated material;
- ix. The storage, as required, of excavated material at 2 no. further dedicated spoil deposition areas;
- x. Change of use of existing residential dwelling to wind farm site office;
- xi. Felling of 15 hectares of commercial forestry plantation to facilitate the construction of wind farm infrastructure;
- xii. The construction of a temporary access track (150m in length) between the N78 national road and L1834 local road;
- xiii. Carriageway strengthening works at 'Black Bridge' on the L1835 and L3037;
- xiv. All associated and ancillary site development, excavation, construction, landscaping and reinstatement works, temporary works to public roads along the turbine component haul route, the provision of site drainage infrastructure and environmental mitigation measures; and,
- xv. A 35-year operational life from the date of commissioning of the entire proposed development.

## 4.0 Environmental Impact Assessment

A full Environmental Impact Assessment Report (EIAR) has been submitted with this planning application to inform the Environmental Impact Assessment (EIA) to be carried out by An Bord Pleanála.

The EIAR is presented as 2 no. volumes, which should be read in conjunction with each other, as follows:-

- **Volume I** comprises the main EIAR text and follows a 'grouped format' structure where each environmental factor is assessed and presented as a separate chapter. The EIA Directive prescribes the range of environmental factors which

should be used to organise descriptions of the environment and likely environmental effects. These have been supplemented with additional environmental factors owing to the characteristics of the project under assessments, as follows:-

- Chapter 1: Introduction;
- Chapter 2: Assessment of Project Alternatives;
- Chapter 3: Description of the Proposed Development;
- Chapter 4: Population & Human Health;
- Chapter 5: Biodiversity;
- Chapter 6: Land & Soils;
- Chapter 7: Water;
- Chapter 8: Air Quality & Climate;
- Chapter 9: Landscape;
- Chapter 10: Cultural Heritage;
- Chapter 11: Noise & Vibration;
- Chapter 12: Shadow Flicker;
- Chapter 13: Material Assets; and
- Chapter 14: Interactions of the Foregoing; and
- **Volume II** comprises a range of annexes, including technical data and reports, which informed the impact assessment provided in **Volume I** so as to ensure the EIAR is transparently supported by evidence. All environmental mitigation measures, as prescribed within the EIAR, have also been compiled into a standalone document and submitted at **Volume II**.

A Non-Technical Summary of the EIAR is also provided as a separate standalone volume in order to facilitate the wider public concerned in their involvement in the statutory consultation during the planning application determination stage.

## 5.0 Appropriate Assessment

A Natura Impact Statement (NIS) has been prepared by Ecology Ireland and submitted with this planning application. The NIS is presented as a separate document and submitted to inform a Habitats Directive Appropriate Assessment to be carried out by An Bord Pleanála (Council Directive 92/43/EC & Council Directive 2009/147/EC). The NIS addresses the entirety of the project, including relevant off-site and secondary developments.

The NIS concludes that the proposed development, individually or in combination with other plans or projects, will not, beyond reasonable scientific doubt, adversely affect the conservation objectives or integrity of any Natura 2000 site

## 6.0 Planning Application Documentation

This planning application is being made directly to An Bord Pleanála under the provisions of Section 37E the Planning and Development Act 2000 (as amended). An Bord Pleanála has instructed the Applicant to notify Kilkenny County Council, as a prescribed body, of the lodgement of the planning application and to furnish you with a copy (or copies) of the planning application documentation. As agreed with the Planning Authority, 6 no. hard copies and 2 no. digital copies of the following has been

provided:-

- Planning Application Notification Letter issued to An Bord Pleanála;
- Completed planning application form;
- Site notice;
- Copy of each newspaper notice (3 no.);
- EIA Portal Confirmation Notice;
- Planning Application Notification Letter issued to each Prescribed Body;
- Planning Application Drawings (see Schedule of Drawings attached to Planning Application Form);
- Environmental Impact Assessment Report;
  - Volume I – Assessment of Proposed Development;
  - Volume II – Technical Annexes in support of Volume I;
  - Non-Technical Summary; and
- Natura Impact Statement.

All planning application and associated documentation is also available to view at the dedicated project website [www.whitehillwindfarmplanning.ie](http://www.whitehillwindfarmplanning.ie).

## 7.0 Planning Application Procedure

You are advised that An Bord Pleanála may, in respect of an application for permission, decide to:-

- (a) (i) grant the permission/approval; or  
(ii) make such modifications to the proposed development as it specifies in its decision and grant permission/approval in respect of the proposed development as so modified; or  
(iii) grant permission/approval in respect of part of the proposed development (with or without specified modifications of the foregoing kind), and any of the above decisions may be subject to or without conditions; or
- (b) Refuse to grant the permission/approval.

Submissions or observations may be made only to An Bord Pleanála, 64 Marlborough Street, Dublin 1; or via the An Bord Pleanála website [www.pleanala.ie/en-ie/observations](http://www.pleanala.ie/en-ie/observations); relating to:-

- (i) The implications of the proposed development for proper planning and sustainable development;
- (ii) The likely effects on the environment of the proposed development; and
- (iii) The likely significant effects of the proposed development on a European site, if carried out.

Any submissions or observations from Kilkenny County Council must be received by An Bord Pleanála no later than 5.30p.m. on 19 February 2023.

## 8.0 Conclusion

This planning application is being lodged with An Bord Pleanála following a determination that the proposed development constitutes a SID. Government policy recognises that onshore wind energy, as a proven and cost effective technology in



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the context of Ireland's abundant wind resource, will continue to be the major contributor to Ireland's renewable electricity generation to 2030 and the generation of electricity from the proposed development will make a substantial contribution to the reduction of fossil fuel generated electricity and the abatement of greenhouse gas emissions.

The EIAR and NIS submitted with this planning application provide a comprehensive assessment of the likelihood of significant adverse environmental effects arising as a result of the proposed development individually and in combination with other existing, permitted and proposed developments. Overall, it is assessed that any likely adverse environmental effects resulting from the proposed development can be managed and mitigated and that there are lasting social and environmental benefits as a result of the proposed development.

We trust that the documentation provided is in order and is sufficient for your consideration of this proposed development. Should you have any queries in relation to any of the information enclosed, please do not hesitate to contact this office.

Yours sincerely,

*Galetech Energy Services*

**Galetech Energy Services Ltd**

