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Senior Executive Officer
Draft Carlow County Development Plan 2022-2028
Planning Department
Carlow County Council
Athy Road
Carlow
R93 E7R7

1 October 2021

To whom it may concern,

Re: Draft Carlow County Development Plan 2022-2028

1.0 Executive Summary

On behalf of our client, Carlow Wind Limited, we wish to make the following submission to the Draft Carlow County Development Plan (CDP) 2022-2028.

On the basis of the clear, long-standing policy support provided in the Carlow County Development Plan 2015-2021 for the development of wind energy, our client has, for a number of years, been assessing the suitability of lands to the west of Oldleighlin (identified in the Carlow County Development Plan 2015-2021 as 'Lackan') for the siting of a wind farm. The lands are presently designated as a 'Preferred Location' for wind energy development. Following the positive outcome of this assessment, our client is currently progressing the preparation of a planning application for development at this location. The subject lands of the proposed development are identified, in red, at **Annex 1**.

However, following a review of the Draft Carlow County Development Plan 2022-2028, and the Draft Renewable Energy Strategy contained therein, our client is very concerned to discover that Carlow County Council is now proposing to reverse this positive designation to 'Not Normally Permissible'. Having reviewed the Draft Renewable Energy Strategy, and the wider policies of the Draft CDP 2022-2028, we can find no substantive rationale whatsoever that would justify such a significant and abrupt policy reversal.

The subject lands adhere to, and are fully in accordance with, the key criteria set out in the Draft Carlow CDP 2022-2028 upon which the designation of preferred locations for wind energy development is based. In particular:-

- 1) The subject lands are assessed to have a wind speed in excess of 7.6m/s (per Figure 6.2 of the Draft Renewable Energy Strategy);
- 2) The subject lands are not the subject of any overwhelming environmental, heritage and amenity constraints, including the presence of European or Ramsar sites; significant groundwater vulnerability or flood risk susceptibility; geoheritage significance or geological instability concerns; or cultural heritage features (per Figure 3.4 of the Draft Renewable Energy Strategy, and Maps 10.1 and 10.2 of the Draft Carlow County Development Plan 2022-2028);
- 3) There is a sufficient spatial extent (land) available for the development of a wind energy development which, in the first instance, allows for adherence to turbine

manufacturer requirements for inter-turbine spacing and, secondly, accords with the visual amenity setback requirements (separation distances) to residential dwellings as set out in the *Draft Revised Wind Energy Development Guidelines 2019*; and

- 4) The proposed development would not directly interfere with any identified scenic routes or viewpoints. A number of scenic routes and viewpoints are located to the northeast of the subject lands; however, the protected vista provides for panorama views across the Central Plain, to the east, away from the subject lands.

Our client therefore wishes to express very serious concern that the proposed de-classification of Lacklan as a 'Preferred Location' to 'Not Normally Permissible' has not been undertaken on the basis of any of the key determining criteria as prescribed in the Section 28 Wind Energy Development Guidelines of Planning Authorities 2006 and the Draft Renewable Energy Strategy, and in the absence of any material alteration to the Landscape Character Assessment. It is therefore entirely unjustified and fails to have any substantive evidential basis.

Accordingly, our client submits that the exclusion of the subject lands is inappropriate and wholly unwarranted having regard to the pressing urgency of delivering on binding national renewable energy targets. Our client therefore respectfully requests that the Planning Authority:-

- 1) Reverse the proposed de-classification such that the area identified as 'Lackan' continues to be designated as a 'Preferred Location' for wind energy development; and
- 2) Carry out a full re-appraisal of all lands within County Carlow for wind energy development, including the entirety of the subject lands, to identify suitable locations for wind energy development such that the wind resource of the county can be fully exploited.

2.0 Introduction

Firstly, our client welcomes the opportunity to make this submission on the Draft Carlow County Development Plan 2022-2028 ('the Draft Plan') which will guide the appropriate development of County Carlow over the period of the plan, including in respect of the delivery of renewable energy development. Furthermore, our client welcomes the preparation of a dedicated Draft Renewable Energy Strategy ('Draft RES') by Carlow County Council ('the Planning Authority') which addresses the broad range of renewable energy technologies available in meeting Ireland's binding renewable energy targets.

As the Planning Authority will be aware, the current Programme for Government commits to an average 7% per annum reduction in overall greenhouse gas emissions from 2021 to 2030 (a c.51% reduction over the decade) and to achieving 'net-zero' emissions by 2050. This has recently been legislated for in the Climate & Low Carbon Development (Amendment) Bill 2021 and is one of the most ambitious decarbonisation pathways anywhere in the world. The Programme for Government also recommits to a renewable energy target of at least 70% by 2030. According to the latest EPA projections, a 70% contribution of renewable energy in electricity

generation by 2030 will mainly result from a further expansion in wind energy, including a total of 8.2 gigawatts (GW) of onshore wind as set out in the Climate Action Plan 2019.

At the time of writing, the Republic of Ireland has an approximate installed capacity of 4.3GW thus requiring the delivery of a further 3.9GW of capacity to be installed up to 2030 to achieve the overall target of 8.2GW. Effectively, a doubling of the currently installed onshore wind capacity will be required in order for Ireland to meet the targets set out in the Climate Action Plan 2019. This target, and others, can only be achieved where all stakeholders; including Government, the general public, developers, and planning authorities; endeavour to maximise the delivery of wind energy developments to fully exploit the substantial wind resource available in Ireland. It is, therefore, imperative that planning authorities, including Carlow County Council, set ambitious local targets for the delivery of wind energy developments and that local planning policy creates an environment which is conducive to the delivery of such developments at appropriate locations.

3.0 Carlow County Development Plan 2015-2021

In accordance with the criteria included in the Wind Energy Development Guidelines for Planning Authorities 2006, the Carlow County Development Plan 2015-2021 ('the current Plan'), and incorporated Wind Energy Strategy ('WES'), provides a detailed assessment of the suitability of the existing environment of County Carlow to accommodate wind energy developments having regard to *inter alia* wind speeds, landscape character and visual impacts, biodiversity, residential amenity (noise and shadow flicker) and geological conditions. The outcome of this detailed assessment was the production of a Wind Energy Strategy Map (Map 10) which identified a number of 'Preferred Location[s]' for wind energy developments and others categorised as being 'Open for Consideration' for such developments.

On foot of the WES, and the designation of suitable lands therein; our client has, over a number of years, undertaken comprehensive assessments of the lands located within, and in the immediate environs of, the 'Lackan' preferred location, located approximately 4km west of Oldleighlin immediately adjacent to the county boundary with County Kilkenny. These extensive assessments have demonstrated that there are lands ('the subject lands') available within the preferred location, and immediately adjacent to it, which are generally suitable for a wind energy development.

In particular, the subject lands are not assessed to be of any particular ecological significance, are not susceptible to ground instability or flood risk, are not of any particular scenic value or quality, and are of a sufficient scale such that substantial separation or setback distances to residential dwellings can be achieved¹.

The suitability of the subject lands, and this general location, is further reinforced by virtue of the fact that the adjoining lands in County Kilkenny are, in the recently adopted Kilkenny City & County Development Plan 2021-2027, designated as being 'Acceptable in Principle' for wind energy development. The wind energy strategy

¹ Separation distances to residential dwellings can be achieved in accordance with the requirements of the Draft Revised Wind Energy Development Guidelines 2019.

mapping from the current Plan (Carlow County Council) and the Kilkenny City & County Development Plan 2021-2027 have been amalgamated at **Annex 1**, and clearly demonstrates the consistent approach taken by the respective planning authorities in the classification of lands in this area.

Our client submits that the current designation of lands in this general area, within both currently adopted County Development Plans is reflective of a consistent assessment approach having been implemented by each planning authority and is clear and unequivocal evidence of the suitability of these lands for wind energy development.

4.0 Draft Carlow County Development Plan 2021-2027

4.1 Introduction

Our client welcomes the overall objective of the Draft RES and the clear recognition that, “[a] Renewable Energy Strategy (RES) for Carlow is vital to enable the county to fully harness its natural resources in a way that is both economical and sustainable” [emphasis added]. Furthermore, our client supports the ‘Vision for Renewable Energy’, at Section 1.3 of the Draft RES, which seeks, “[t]o encourage and support the transition of Carlow to a sustainable county through community engagement, energy efficiency and the sustainable development of renewable energy, whilst providing environmental and economic benefit at a local and national level in accordance with all relevant planning and environmental considerations.”

Initially, therefore, it would appear that the Draft RES is fully supportive of the further development of renewable, including wind, electricity generating projects and is delivering on its objective to cascade national renewable energy policy to the local level. However, following a detailed assessment, our client submits that the ambition displayed by the overall objective and vision of the Draft RES is not reflected throughout and, unfortunately, it does little to actively encourage and promote the delivery of onshore wind energy developments which, as described above, is heavily supported by Government and widely recognised as the key mechanism in reaching renewable energy generation and greenhouse gas emission targets.

As described above, the current electrical capacity of wind energy developments in the Republic of Ireland is approximately 4.3GW². According to Table 6-1 of the Draft RES, County Carlow currently has an installed capacity of c. 5.8 MW which accounts for 0.13% of the currently installed national wind energy capacity. While the relative scale of the county, when compared to others, is acknowledged, our client submits that there is significant untapped potential within the county for a substantial increase in the contribution of County Carlow to the volume of renewable electricity being generated; however, this potential fails to be recognised by the Planning Authority.

Section 6.1.5 of the Draft RES describes, on the basis of certain mapping exercises and assumptions, what the Planning Authority considers to be the estimated available capacity in County Carlow. However, as will be demonstrated further below, our client submits that the calculations and assumptions significantly underestimate the

² Wind Energy Ireland (<https://windenergyireland.com/about-wind/facts-stats>) estimates the electrical capacity in the Republic of Ireland to be 4,309 megawatts (MW)

available lands for development and, consequently, estimate that County Carlow will only contribute a further 18.3MW of wind energy. On this basis, and assuming that Ireland meets its target of 8.2GW of onshore wind energy, County Carlow will be contributing, a barely perceptible, 0.29% to Ireland's overall wind energy generation.

This clearly demonstrates a very significant overall lack of ambition in the Draft RES, in terms of wind energy, and is therefore entirely at odds with settled national policy regarding the development of wind energy projects.

4.2 Technical Analysis & Mapping Exercise

As described above, following the identification of 'Lackan' as a 'Preferred Location' for wind energy development in the current Plan, our client has undertaken extensive assessments to confirm the suitability of lands within this location for a wind farm. These assessments have demonstrated that there are lands available, both within the 'Preferred Location' and immediately adjacent, which can accommodate a wind farm and our client has progressed plans for such a development.

However, our client is disappointed to note that the Planning Authority now proposes to remove this currently positive designation of the 'Lackan' area and, instead, designate this area as being 'Not Normally Permissible'³. It is not apparent, from reading the Draft RES, as to precisely why the Planning Authority proposes to undertake such a radical reversal of the designation of this area. As no justification is provided, our client has completed a comprehensive 'compare and contrast' exercise of the current Plan and the Draft Plan in an effort to fully understand the rationale and justification for same.

The Draft RES, at Section 6.1.5, sets out a stepwise '*technical analysis and mapping exercise*' in order to identify the most suitable locations for wind energy development and 4 no. key criteria in assessing the suitability of a location/area for wind energy development. These criteria are as follows:-

- 1) Wind Speed – using data presented in the SEAI Wind Energy Atlas;
- 2) Environmental, Heritage and Amenity Constraints – taking into account constraints posed by features such as European and Ramsar protected sites including waterbodies, settlements and existing infrastructure/material assets, and also taking into account natural physical attributes such as groundwater vulnerability, geological heritage sites, soil drainage, landslide and flooding susceptibility;
- 3) Available Area > 5km² - taking into account the spatial requirements for large wind farm development; and
- 4) Separation distances from housing – taking into account the mandatory setback distance of 500m from all sensitive receptors as per the Draft 2019 WEDGs.

³ It is evident that the Planning Authority has not had regard to Section 3.1.1.4 of the *Methodology for Local Authority Renewable Energy strategies*, and the guidance to consult the policy documents of neighbouring local authorities to avoid transboundary issues, given the stark difference in the designation of the Lackan area in the Draft Plan compared to the adjoining lands in the Kilkenny City & County Development Plan 2021-2027.

Each of these steps/criteria are addressed in turn below, including in terms of their relevance to subject lands.

4.2.1 Wind Speed

Figure 6.3 of the Draft RES illustrates areas which are assessed to have a wind speed of greater than 7.6 metres per second (m/s). Having reviewed the Sustainable Energy Authority of Ireland (SEAI) Wind Mapping System⁴, it is noted that the 'Lackan' area, and the subject lands, generally have an estimated wind speed in excess of 8m/s at 100m height. Separately, our client has installed a meteorological mast on the subject lands and the data gathered to date indicates an average wind speed of 7.8m/s at 100m height. Our client submits, therefore, that the wind speeds of the subject lands, both predicted and actual, are of a sufficient level to ensure the viability of a wind energy development at this location. This is reaffirmed at Section 6.1.5.1 of the Draft WES where it is stated that, "[i]n the western area of the county, in the Killeshin Hills landscape character area, close to border with County Kilkenny, the wind speeds are favourable".

4.2.2 Environmental, Heritage and Amenity Constraints

The second step in the Draft RES's evaluation of potentially suitable sites for wind energy development predominately involves an evaluation of lands having regard to the natural environmental, heritage and amenity designations. The Draft RES assesses the presence of environmental constraints which could limit, or preclude, wind energy developments at certain locations including *inter alia* European and Ramsar protected sites including waterbodies, settlements and existing infrastructure/material assets, groundwater vulnerability, geological heritage sites, soil drainage, ground stability and flooding susceptibility.

Unfortunately, the Planning Authority has not completed a detailed assessment of the 'Lackan' area, or adjoining lands, to determine the presence, or lack thereof, of specific constraints; however, we set out a brief assessment below.

4.2.2.1 Ecological/Biodiversity Designations

There are no European or Ramsar designated site either within the 'Lackan' area or in its immediate vicinity. The nearest Special Protection Area (SPA), designated for the protection of avian species, is the River Nore SPA and is located c. 12km to the west. The nearest Special Conservation Area (SAC), designated for the presence of protected habitats of species, is the River Barrow and River Nore SAC located c. 2.5km to the north. There are no Ramsar sites located within 20km of the 'Lackan' area or the subject lands.

As part of our client's assessment of the subject lands, extensive ornithological and other ecological surveys have been completed which have concluded that the subject lands are of no particular ecological/biodiversity significance.

⁴ <https://gis.seai.ie/wind/>

4.2.2.2 Settlements, Existing Infrastructure, and Material Assets

The 'Lackan' area and subject lands are located in rural County Carlow which exhibits a dispersed settlement pattern comprising one-off rural dwellings often accompanied by agricultural buildings. The subject lands have been assessed for the presence of infrastructure or other material assets which could constrain the development of a wind farm; however, no particular constraints have been identified which would preclude such a development.

4.2.2.3 Groundwater Vulnerability

The 'Lackan' area and subject lands are located in an area considered, by Geological Survey Ireland, to have a groundwater vulnerability ranking of 'Moderate' to 'Extreme'. However, it should be noted that due to the near-surface nature of construction activities and the characteristics during their operational phase, wind energy developments do not pose a significant risk to groundwater.

Therefore, the vulnerability classification of 'Moderate' to 'Extreme' should not, of itself, be a determining factor in the designation of suitable areas for wind energy development due to the specific characteristics of such developments and the availability of measures to ensure the protection of the hydrogeological, and hydrological, environment.

4.2.2.4 Geological Heritage Sites

There are no geological heritage sites within the 'Lackan' area or the subject lands. The nearest such site is Bannagagole Quarry, located immediately south of Oldleighlin approximately 500m east of the 'Lackan' area.

4.2.2.5 Ground Stability

The 'Lackan' area and subject lands are generally considered, by Geological Survey Ireland, to have a 'Low' susceptibility to landslides. It is noted, however, that isolated parcels of land have a higher classification but these are assessed as being related to localised escarpments and the natural topography of the area. The subject lands are located on the Castlecomer Plateau which, as the name suggests, is a relatively flat site despite its increased elevation when compared to the surrounding landscape. Ground stability is not, therefore, assessed to be a significant constraint in this general location.

4.2.2.6 Flood Risk Susceptibility

The Strategic Flood Risk Assessment, prepared to support the Draft Plan, does not identify any risk of flooding in the 'Lackan' area or within the subject lands. This is a logical outcome of the assessment given the characteristics of the local topography and the location of the site on the Castlecomer Plateau.

4.2.2.7 Summary

Evidently; on the basis of the key environmental, heritage and amenity criteria under which the Planning Authority have assessed the suitability of areas for wind energy development; the 'Lackan' area and the subject lands exhibit a high degree of compliance with the stated requirements and clearly do not contain any

overwhelming constraints which would preclude a wind energy development on the subject lands. The absence of environmental constraints in this general area is, in fact, recognised at Section 6.1.5.1 of the Draft RES which states, "...there are no environmental designations that would preclude wind farm construction."

4.2.3 Available Area > 5km²

The Draft RES takes the view that a minimum spatial extent of 5km² is required in order to accommodate a wind energy development. However, no evidence base, justification or rationale has been offered for this entirely arbitrary figure.

While turbine manufacturers often require specific inter-turbine spacings, a careful iterative design and siting process can often deliver wind energy development within relatively compact sites. The assumed requirement, of the Draft RES, that a minimum area of 5km² is required to accommodate a wind energy development is, therefore, overly-restrictive and would preclude the delivery of small-scale developments of, for example, less than 5 no. turbines.

As a consequence of the selection of this arbitrary spatial extent, the Planning Authority has completely undermined the entire Draft RES (as it relates to wind energy) given that all subsequent wind energy developments will be subject to this minimum criteria.

4.2.4 Separation distances from housing

As part of our client's evaluation of the subject lands, it has been identified that substantial setback distances to dwellings, in excess of 500m, are readily achievable. This evaluation has been undertaken using a desktop approach followed by fieldwork to verify and validate the desktop study. In fact, the preliminary design of our client's proposed development facilitates a separation distance of 720m to all non-involved residences; while, in accordance with the *Draft Revised Wind Energy Development Guidelines 2019*, reduced separation distances can be applied to involved dwellings. In the case of our client's preliminary project design, there would be no residential dwellings located within 500m of a proposed wind turbine.

Our client submits, therefore, that Figure 6.3 of the Draft RES fails to fully identify all lands located in excess of 500m from a residential dwelling. Moreover, Section 6.1.5.1 states that, "...the constraints mapping suggests that it may be difficult to meet separation distances between wind turbines and dwellings..." in the 'Lackan' area and subject lands. This has been demonstrated, through detailed investigations by our client, to be incorrect. Therefore, it is recommended that a further assessment of available lands is undertaken to ensure that all suitable lands within County Carlow are correctly identified.

4.2.5 Summary

The above appraisal of the 'Lackan' area and the subject lands identified by our client as being suitable for development clearly, and unequivocally, demonstrates that this area is generally suitable for wind energy development. No particular constraints have been identified in this general location and, in the event and any site-specific constraints were identified, appropriate design measures could be

implemented to avoid these localised constraints. The 'Lackan' area and subject lands are, therefore, undoubtedly a suitable location for wind energy development in accordance with the Planning Authority's very own assessment criteria.

4.3 Landscape Character Assessment

It is noted, at Section 6.1.5 of the Draft RES, that an assessment of landscape and visual constraints is specifically excluded from the technical analysis and mapping exercise undertaken. A separate assessment of the landscape and visual capacity of the county to accommodate wind energy developments is provided at Section 6.1.5.1.

In the first instance, it is noted that a revised Landscape Character Assessment (LCA) has not been prepared and the LCA from the current Plan has been incorporated into the Draft Plan. In doing so, the Planning Authority are confirming that there has been no substantive alteration to the existing landscape such that would warrant a revision to the landscape character areas, landscape character types or, indeed, landscape sensitivities.

In the LCA, the 'Lackan' area and the subject lands are located wholly within the 'Killeshin Hills' principal landscape character area and the 'Uplands' landscape type. The 'Uplands' landscape type is, on a scale of 1-to-5, assessed as having a sensitivity of '5' (i.e. the highest sensitivity ranking). Additionally, the LCA considered that the Killeshin Hills had a 'Moderate' capacity to accommodate wind energy developments.

The Wind Energy Strategy ('WES') contained within the current Plan states, however, that *“Preferred areas in the county are in the Killeshin Hills...These are considered suitable because they are not identified as important in the tourist strategy for the County, their scenic value is limited, and the landscape has capacity to visually absorb wind farms because of the relatively level terrain and the high incidence of forest plantations”* [emphasis added]. This WES, as informed by the LCA of the current Plan, clearly assess the Killeshin Hills to be a preferred location for wind energy development.

However, despite the fact that:-

- (i) a revised LCA has not been prepared and previously assessed landscape sensitivities have not been altered; and
- (ii) no additional scenic views or routes have been introduced into this general location, re-affirming the absence of any substantive alterations;

the Planning Authority is now proposing to designate all 'Upland' landscape types as 'Not Normally Permissible' for wind energy developments.

This alteration has been proposed without any justification whatsoever and seems wholly irrational given the inference that the existing landscape has not been altered. The Planning Authority has not offered any rationale or explanation for this radical reversal. Given that the LCA of the Draft Plan remains identical to that of the current Plan, our client submits that there is no evidence or reasoning to support such a proposal and requests that the Planning Authority reverse this decision and again re-classify the 'Lackan' area, and, indeed, the subject lands' as a 'Preferred Location'

for wind energy development.

4.4 Absence of Overall Wind Energy Strategy Map

Despite the analysis undertaken in the Draft RES; which, as described above, our client submits is fundamentally flawed; the Draft RES fails to provide any clear direction or wind strategy map which clearly conveys the location of suitable wind energy development areas in the county. Put simply, the Draft RES simply indicates that there are 2 no. locations within the county designated 'Not Normally Permissible' but fails to identify any locations where wind energy developments should be directed (i.e. Preferred Locations) or areas where such development may be acceptable subject to compliance with prevailing national policy or guidance (i.e. Areas Open to Consideration').

While it is noted that the Draft RES states that, "*the technical mapping exercise in and of itself does not support nor preclude wind energy development. It is a tool which flags areas of having a higher or lower concentration/ distance from various sensitive receptors*"; our client submits that the failure of the Draft RES to clearly and coherently identify suitable lands for development represents a flawed approach to the overall preparation of this Draft RES.

5.0 Conclusion

The recently published Programme for Government commits to an average 7% per annum reduction in overall greenhouse gas emissions from 2021 to 2030 (a 51% reduction over the decade) and to achieving net zero emissions by 2050. This is one of the most ambitious decarbonisation pathways anywhere in the world.

Having regard to the above, our Client submits that the Planning Authority has not offered any reasoned explanation or evidence for the de-classification of the 'Lackan' area or the subject lands. The de-classification of these lands has been proposed despite meeting the criteria applied in the Draft RES by the Planning Authority for the identification of suitable lands. Moreover, the application of these criteria has, as explained in detail above, been found to be undermined by inaccuracies and is fundamentally flawed.

The de-classification of the 'Lackan' area and the failure of the Draft RES to identify and designate the subject lands as suitable for wind energy development is inappropriate. Having regard to the pressing urgency of delivering on binding national renewable energy targets, our client, therefore, respectfully requests that the Planning Authority:-

- 1) Reverse the proposed de-classification such that the area identified as Lackan continues to be designated as a 'Preferred Location' for wind energy developments; and
- 2) Carry out a full re-appraisal of all lands within County Carlow for wind energy development, including the entirety of the subject lands, to identify suitable locations for wind energy development such that the wind resource of the county can be fully exploited.



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The development of renewable energy infrastructure is a long term investment with a long lead time and which requires policy certainty and information consistency. In accordance with the principles of evidence-based planning, the Planning Authority must provide a justification as to why a location which was designated as a 'Preferred Location' under the current Plan is now considered 'Not Normally Permissible' and, where sufficient evidence and reasoning cannot be provided, the positive designation should be reinstated.

Kind Regards,

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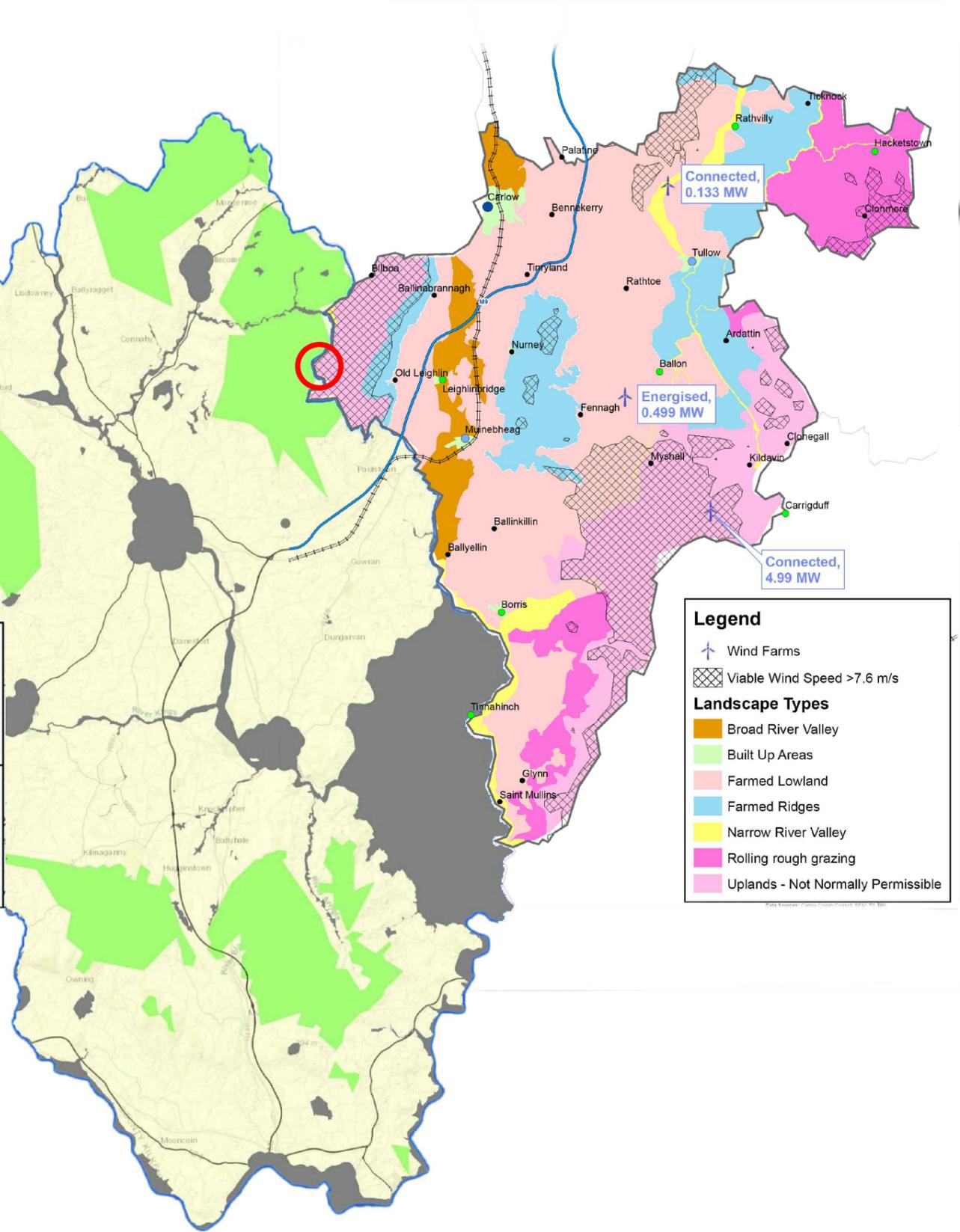
**Annex 1 –
Comparison of adjoining Wind Energy Designations in County Carlow and County
Kilkenny**





Kilkenny City and County Draft Development Plan 2021-2027
 Figure Draft Wind Strategy Areas
 Date: December 2020

- Open for Consideration
- Acceptable in Principle
- Not normally permissible
- County Boundary



Legend

- Wind Farms
- Viable Wind Speed >7.6 m/s

Landscape Types

- Broad River Valley
- Built Up Areas
- Farmed Lowland
- Farmed Ridges
- Narrow River Valley
- Rolling rough grazing
- Uplands - Not Normally Permissible



Prepared by:
Legend:
 Approximate Site Location

Date	Rev.	Description	Drawn By

Agent Address:
 Gaitech Energy Services,
 Clondargan,
 Stradone,
 Co. Cavan

Job Title:
Whitehill Wind Farm

Client:
 Carlow Wind Ltd

Drawing Title:
 Wind Strategy Mapping for Kilkenny
 (Draft 2021) and Carlow (Draft 2021)

Drawing No.: WHL01_CDP_LOC_001	Revision No.: 0
Scale: NTS	Date: 23/09/2021
Drawn By: C.M.P	Checked By: J.B
	Confirmed By: S.C