



Kilkenny City and County
Development Plan 2021-2027

Chief Executive's Report

Report of the Chief Executive on Submissions to the Ministerial Draft
Direction

Forward Planning

Date: 10th December 2021

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1 Introduction and Overview

1.1 Background – Draft Ministerial Direction

On the 15th October 2021, the Minister for Housing, Local Government and Heritage, consequent to a recommendation made to him by the Office of the Planning Regulator under Section 31AM(8) of the Planning and Development Act 2000 (as amended) (hereafter referred to as the Act), issued a Draft Ministerial Direction to Kilkenny County Council (for full text see Appendix A).

The Draft Ministerial Direction relates to the Kilkenny City and County Development Plan 2021-2027 (KCCDP) and requires the following steps to be taken:

- a) Reinstatement of 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. Reinstatement of areas designated at Templeorum/Mullenbeg to 'acceptable in principle' in accordance with the 'draft wind energy strategy' of the draft Plan.
 - ii. Reinstatement of areas designated at Castlebanny to 'acceptable in principle' in accordance with the 'draft wind energy strategy' of the draft Plan.
 - iii. Reinstatement of 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.

1.2 Legislative context for the Direction

In his notice dated 15th October 2021, the Minister stated that in his opinion, the adopted Plan is not consistent with specific planning policy requirements specified in guidelines issued by the Minister under subsection (1) of Section 28 of the Act.

This refers to the Specific Planning Policy Requirement (SPPR) contained in the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change* (July 2017) issued by the Minister under Section 28 of the Act, which states as follows:

It is a requirement under Section 28(1C) of the Act that where guidelines may contain Specific Planning Policy Requirements that planning authorities, regional assemblies and the Board shall, in the performance of their functions, comply.

The *Interim Guidelines* of July 2017 contain the following Specific Planning Policy Requirement:

- (1) Ensure that overall national policy on renewable energy is acknowledged and documented in the relevant plan;

(2) Indicate how the implementation of the relevant plan over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts).

1.3 Details of Public Display

Notice of the Draft Ministerial Direction was published on 29th October, 2021. A copy of the Draft Direction was made available for inspection and submissions or observations were invited for a two-week period between 29th October, 2021 and 12th November, 2021.

The documents were on public display on the Council's public consultation portal **Consult.Kilkenny.ie** and hard copies of the documents were made available for public display at the Planning public counter and in all the County Libraries subject to Covid-19 protocols in place during the display period.

1.4 Purpose of the Chief Executive's Report

Section 31 of the Act sets out the requirement for the Chief Executive to prepare a report on any submissions or observations received.

In this regard, the report of the Chief Executive must:

- a) summarise the views of any person who made submissions or observations
- b) summarise the views of and recommendations (if any) made by the Elected Members
- c) summarise the views of and recommendations (if any) made by the Regional Assembly
- d) make recommendations in relation to the best manner in which to give effect to the draft direction.

The report of the Chief Executive must be furnished to the Elected Members of the Planning Authority, the Office of the Planning Regulator (OPR) and the Minister, no later than four weeks after the expiry of the public consultation period.

1.5 Next Steps

In accordance with the provisions of Section 31AN(4) of the Act, the OPR shall consider the report of the Chief Executive on the submissions, together with any submission made under section 31(10) of the Act, and shall recommend to the Minister that he or she issue the direction with or without minor amendments or where the Office is of the opinion that:

- a) a material amendment to the draft direction may be required
- b) further investigation is necessary in order to clarify any aspect of the report furnished or submissions made, or
- c) it is necessary for any other reason, then the Office may, for stated reasons, appoint a person to be an inspector no later than 3 weeks after the date of receipt of the Chief Executive's Report.

If the Minister agrees with the Recommendation, then he shall issue the direction with or without minor amendments. Pursuant to Section 31(17) of the Act, the direction issued by the Minister is

deemed to have immediate effect and its terms are considered to be incorporated into the Plan, or, if appropriate, to constitute the Plan.

2 Summary of submissions received in relation to the Draft Ministerial Direction

In total 723 individuals or groups engaged in this process and made a submission. It is important to note that many of these submissions were made by more than one person, so in total 271 different submissions were received by Kilkenny County Council to the Draft Ministerial Direction, as listed in Appendix B¹. Where a submission was sent on behalf of a number of individuals, the individual names are all contained in Appendix B.

The 723 submissions made to the content of the Ministerial Draft Direction have been categorised according to the aspect of the Ministerial Direction that they relate to as follows:

- Renewable energy targets,
- Designation of the Templeorum/Mullenbeg area,
- Designation of the Castlebanny area,
- Designation of the three smaller areas
- All other issues, including the legality of the Direction

A total of 5 submissions were received from industry stakeholders. These have been summarised in Section 2.5.

2.1 Renewable Energy Targets

2.1.1 Target

KK-C183-2, KK-C183-3, KK-C183-5, KK-C183-7, KK-C183-8, KK-C183-9, KK-C183-25, KK-C183-33, KK-C183-40, KK-C183-41, KK-C183-145, KK-C183-148, KK-C183-214, KK-C183-218, KK-C183-220, KK-C183-260, KK-C183-271

- Ministerial Directive is not taking full cognisance of all the facts when they have asked for 100% renewable energy for County Kilkenny when the national target is lower at 70%, as it doesn't take account of solar or hydro energy.
- Why should the Council's renewable energy target exceed the national target? The Climate Action Plan 2021 published on the 4th November, 2021 calls for 80% of electricity to be generated from renewable sources by 2030.
- There appears to be a lack of support and acceptance for alternative and viable renewable energy options.
- Renewable energy developments can easily meet the targets specified without increasing the area designated as "Acceptable in Principle". This is evidenced by some examples of the output from large scale renewable developments including wind farms, ABP Ref: 306706 Bord na Mona Powergen Ltd (Offaly) 21 Turbines generating 88.2MW (4.2MW per turbine) within a footprint totalling 25 hectares, and ABP Ref: PA0029 Oweninny Power Limited (Mayo) 112 Turbines generating 370MW (3.3MW per turbine) within a footprint of 5,000 hectares. Two solar farm examples are ABP Ref: 310367 Elgin Energy Services Ltd (Offaly) 60MW within a

¹ The full text of the submissions received are available to view at the following link: <https://consult.kilkenny.ie/en/node/5380/submissions>

footprint of 86.7 hectares and ABP Ref: 302681 Terra Solar II Ltd. (Kerry) 50MW within a footprint of 99.2 hectares.

- As a country, we are not lagging behind in the generation of onshore wind power.
- Compliance with the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change* can be achieved by simply providing a figure in megawatts for the potential wind energy resource already identified.
- Eirgrid has stated they cannot achieve Government targets under present policy as countrywide scattered developer led wind farms at present will be difficult to connect to the grid.
- Eirgrid has requested Government led clustered off shore wind farms to be in close proximity to high demand centres.
- The proposal of 100% renewable energy is beyond possible in County Kilkenny.

2.1.2 Reliability of Wind Energy

KK-C183-1

- Renewable energy is not necessarily sustainable energy. There was no wind energy produced over three months between early July and the end of September 2021, and we may well have similar windless months in the future.

2.1.3 Other sources of Energy

KK-C183-1, KK-C183-2, KK-C183-4, KK-C183-8, KK-C183-9, KK-C183-220

- Nuclear reactors should be considered.
- Farm sheds have ample roof space to generate solar energy without any intrusion and environmental damage.
- There is ample land to grow crops for anaerobic digesters.
- Biogas could be harnessed. Kilkenny already is one of the most advanced farming regions in the country, with an opportunity to utilise this renewable resource.
- There are efficient, viable and practical alternative options and technologies for our inland county, such as solar, and there are examples of large-scale solar farms elsewhere in the country, e.g. Meath.
- Biogas and solar are both more welcoming to biodiversity and less visually offending than wind.
- The Government has committed to the rapid development of offshore wind technology and the Climate Emergency Bill had identified offshore wind energy as the most efficient wind energy solution to Ireland's climate crisis. Unwise to redesignate a heritage area in Kilkenny within this context.

2.1.4 Effects on landscape

KK-C183-1

- Such a renewable energy target will negatively affect the beautiful, unspoilt countryside

2.2 Templeorum/Mullinbeg/Tullahought

KK-C183-2, KK-C183-3, KK-C183-4, KK-C183-5, KK-C183-6, KK-C183-220 KK-C183-2, KK-C183-3, KK-C183-4, KK-C183-5, KK-C183-6, KK-C183-7, KK-C183-8, KK-C183-13, KK-C183-14, KK-C183-15, KK-C183-17, KK-C183-22, KK-C183-23, KK-C183-25, KK-C183-31, KK-C183-33, KK-C183-39, KK-C183-40, KK-C183-41, KK-C183-57, KK-C183-61 KK-C183-66, KK-C183-124, KK-C183-129, KK-C183-130, KK-C183-131, KK-C183-132, KK-C183-188, KK-C183-189, KK-C183-209, KK-C183-216, KK-C183-219, KK-C183-221, KK-C183 223. K KK-C183-248, K-C183-261 KK-C183-264 KK-C183-265, KK-C183-266, KK-C183-267, KK-C183-269, KK-C183-270.

- The Councillors and Planners have done so much to protect the heritage of the Lingaun Valley.
- The recognition of the importance of the Linguan Valley area is welcomed, however the Lingaun Valley area needs to be enlarged in order to protect the heritage sites and the visual aspect of the Knockroe Passage Tomb and the Ahenny High Crosses.
- Turbines erected in the Templeorum/Mullinbeg area would affect the Lingaun Valley area.
- If the Templeorum/Mullinbeg area was zoned as a preferred area for turbines it could impact on the important national and international heritage sites, such as the Knockroe Passage Tomb and Ahenny High Crosses
- The protected Lingaun Valley area should be extended into the Templeorum/Mullinbeg area by a distance where large industrial wind turbines would not impact on the visual aspect and connectivity from the important archaeological sites in the valley.
- Turbines erected in the Templeorum/Mullinbeg and Harristown areas will put the many families, nature and quality of life at risk. The alternative of solar farms would provide consistent green energy production without the dangerous and polluting effects of turbines.
- Vital Knockroe horizon is protected and also the surrounding hills remote from Knockroe to a distance where the location of turbines would not protrude over the Knockroe horizon. Nothing should obstruct, distract, or interfere with the horizons or sight lines that are only starting to be understood.
- Turbines in Templeorum/Mullinbeg would be highly visible from the summit of Baunfree Hill.
- Wind turbines would dominate the entire landscape of this historic area, and the ancient and sacred sites of this legendary valley.
- The high crosses of Killamery and Kilkieran are just outside the circle of hills. They are an integral part of the area and should be included with the circle of hills and the enclosed valley in an area zoned unsuitable for turbines.
- To protect the archaeological landscape of Lingaun Valley it is essential that the hills and the area within are designated unsuitable for turbines.
- Wind turbines on the hills of the proposed preferred area of Templeorum/Mullinbeg would seriously impinge on the scenery, landscape and views especially in regard to the Viewing Tower, Baunfree Megalithic Tomb and Kilmacoliver Loop Walk.
- There will be lasting damage done to the local environment, landscape, water tables, water quality, biodiversity, scenic amenity and archaeology. Landslides, noise, and flashing are very unpleasant for all life, animals, birds and people in the area.
- Impacts on archaeological heritage have not been properly assessed, such as on the very important portal tomb of Leac na Scail or Harristown Dolmen.
- The road from Templeorum to Mullinavat, passing through the townlands of Raheen, Ballygown, Dowling and Cashel is one of great scenic amenity.

- Questions the logistics of such a large-scale development given the existing infrastructure with narrow roads in all areas. Very heavy truck traffic during construction poses serious dangers for road users and children. These roads were never designed for industrialisation.
- There may be an impact on farm villages in this area.
- Wind turbine construction phase would be detrimental to this wildlife and turbines would likely result in loss, damage and impact negatively on the nationally decreasing local population of species that include red squirrel, common pipistrelle bats and buzzards.
- Submissions are concerned about the erection of industrial type and size of turbines in large numbers. No definition as to what is large scale on areas that had been classified as not normally permissible now reclassified as permissible.
- Turbines should be at least 1km from any occupied dwelling.
- Blackbog is designated as preferred and windfarm developments would destroy the eastern horizon and ambience of Sliabh Díle.
- Seek to retain the current wind energy designation of 'Open for Consideration' at Castlebanny, Templeorum/Mullenbeg and 3 smaller unnamed areas to the south of the County and request these areas are not redesignated as 'Acceptable in Principle'.
- Large scale industrial wind energy developments should not influence the respected landscape of the county.
- Extremely concerned about the detrimental effects wind turbines would have on the Passage Tomb and the other significant historic sites of the area.
- Any tall manmade structure in the Blackbog/Garryduff/Templeorum/Mullenbeg area which runs the risk of damaging the horizon lines of the ancient landscape and devastating a precious world renowned 5,000 year-old heritage site must be strongly resisted.
- The Wind Energy Guidelines of 2006 are shockingly out of date and unfit for purpose. It is premature to insist on the renewable and particularly wind strategy of a single county when the Government has yet to enact new guidelines and when the new Maritime Bill is on the cusp of being enacted.
- The Ministerial Direction removes autonomy from the people of Kilkenny and from Kilkenny County Council to choose what is best for our County. People living in Kilkenny, many for generations, know the land. These people should have a choice as to which renewable energy resource is most fitting for their locality.
- Has consideration been given to limiting the heights of the proposed wind turbines?
- Has consideration been given to solar energy or bio-gas energy?
- Must carefully decide on and implement renewable energy options for a better future for generations to come without industrialisation of rural environments along with negative visual and noise impacts on our communities and animals.
- The visual and physical attributes of the Lingaun Valley, the scenic views within the area and the intimacy and scale of much of its landscape pattern, the abundance of archaeological heritage sites result in significant aesthetic, recreational and cultural amenity as acknowledged in the Plan which seeks to develop the Lingaun Valley's tourism offer.
- Wind energy development, that would be visible from any part of the Castletown Cox Demesne lands and its unspoilt setting is unacceptable
- Given the importance of the bloodstock industry nationally, regionally and locally, and the sensitivity of equine facilities to environmental change and impacts, a specific policy should be included in the Renewable Energy Strategy that requires any renewable energy proposal within the County to include a detailed assessment of potential impacts on equine facilities

within a 5km radius. Any proposed development that has the potential to adversely impact the industry or the perception of the industry should not be permitted.

2.3 Castlebanny

KK-C183-8 to KK-C183-10 KK-C183-11, KK-C183-12, KK-C183-16, KK-C183-17, KK-C183-18, KK-C183-19, KK-C183-20, KK-C183-21, KK-C183-24, KK-C183-26, KK-C183-27, KK-C183-28, KK-C183-29, KK-C183-30, KK-C183-32, KK-C183-34, KK-C183-35, KK-C183-36, KK-C183-37, KK-C183-38, KK-C183-142, KK-C183-43, KK-C183-44, KK-C183-45, KK-C183-46, KK-C183-47, KK-C183-48, KK-C183-49, KK-C183-50, KK-C183-51, KK-C183-52, KK-C183-53, KK-C183-54, KK-C183-55, KK-C183-56, KK-C183-58, KK-C183-59, KK-C183-60, KK-C183-62, KK-C183-63, KK-C183-64, KK-C183-65, KK-C183-67, KK-C183-68, KK-C183-68, KK-C183-69, KK-C183-70, KK-C183-71, KK-C183-72, KK-C183-73, KK-C183-74, KK-C183-75, KK-C183-76, KK-C183-77, KK-C183-78, KK-C183-79, KK-C183-80, KK-C183-81, KK-C183-82, KK-C183-83, KK-C183-84, KK-C183-85, KK-C183-86, KK-C183-87, KK-C183-88, KK-C183-89, KK-C183-90, KK-C183-91, KK-C183-92, KK-C183-93, KK-C183-94, KK-C183-95, KK-C183-96, KK-C183-97, KK-C183-98, KK-C183-99, KK-C183-100, KK-C183-101, KK-C183-102, KK-C183-103, KK-C183-104, KK-C183-105, KK-C183-106, KK-C183-107, KK-C183-108, KK-C183-109, KK-C183-110, KK-C183-111, KK-C183-112, KK-C183-113, KK-C183-114, KK-C183-115, KK-C183-116, KK-C183-117, KK-C183-118, KK-C183-119, KK-C183-120, KK-C183-121, KK-C183-122, KK-C183-123, KK-C183-125, KK-C183-126, KK-C183-127, KK-C183-128, KK-C183-133, KK-C183-134, KK-C183-135, KK-C183-136, KK-C183-137, KK-C183-138, KK-C183-139, KK-C183-140, KK-C183-141, KK-C183-142, KK-C183-143, KK-C183-144, KK-C183-146, KK-C183-147, KK-C183-149, KK-C183-150, KK-C183-151, KK-C183-152, KK-C183-154, KK-C183-155, KK-C183-156, KK-C183-157, KK-C183-158, KK-C183-159, KK-C183-160, KK-C183-161, KK-C183-162, KK-C183-163, KK-C183-164, KK-C183-165, KK-C183-166, KK-C183-167, KK-C183-168, KK-C183-169, KK-C183-170, KK-C183-171, KK-C183-172, KK-C183-173, KK-C183-174, KK-C183-175, KK-C183-176, KK-C183-177, KK-C183-178, KK-C183-179, KK-C183-180, KK-C183-181, KK-C183-182, KK-C183-183, KK-C183-184, KK-C183-185, KK-C183-186, KK-C183-187, KK-C183-190, KK-C183-191, KK-C183-192, KK-C183-193, KK-C183-194, KK-C183-195, KK-C183-196, KK-C183-197, KK-C183-198, KK-C183-199, KK-C183-200, KK-C183-201, KK-C183-202, KK-C183-203, KK-C183-204, KK-C183-205, KK-C183-206, KK-C183-207, KK-C183-208, KK-C183-210, KK-C183-211, KK-C183-212, KK-C183-213, KK-C183-215, KK-C183-222, KK-C183-224, KK-C183-225, KK-C183-226, KK-C183-228, KK-C183-229, KK-C183-230, KK-C183-231, KK-C183-232, KK-C183-233, KK-C183-234, KK-C183-235, KK-C183-236, KK-C183-237, KK-C183-238, KK-C183-239, KK-C183-240, KK-C183-241, KK-C183-242, KK-C183-243, KK-C183-244, KK-C183-245, KK-C183-246, KK-C183-249, KK-C183-250, KK-C183-252, KK-C183-253, KK-C183-256, KK-C183-257, KK-C183-258, KK-C183-262, KK-C183-268

- Submissions seek to retain the current wind energy designation of 'Open for Consideration' at Castlebanny and request that Castlebanny is not re-designated as 'Acceptable in Principle'.
- Submissions sincerely thank the Councillors of Kilkenny County Council for hearing and standing with the people.
- Ministerial Directive makes a mockery of our democracy and public consultation process as members of the public, local community and Council Members voted to re-instate Castlebanny as 'Open for Consideration'.
- Ministerial Directive removes autonomy from the people of Kilkenny and from Kilkenny County Council to choose what is best for our county. Their decision preserves County Kilkenny's heritage, landscape, biodiversity and ground water supply for the future and for generations to come.

- The strategic aim in the Development Plan to generate 100% of electricity demand for the County through renewables by 2030 is ambitious and unnecessary as the Climate Action Plan 2021 published on the 4th November, 2021 calls for 80% of electricity to be generated from renewable sources by 2030. By requiring 100% of electricity demand to be met by renewables, the Minister's Direction is therefore inconsistent with the Climate Action Plan.
- The question is posed that if many forms of 'renewable' energy technologies exist and can be used to meet targets, then why the emphasis on wind energy?
- The Castlebanny application (Reference No. ABP-309306) seeks to construct 21 turbines at a height of 185 metres. By bypassing the local planning process this development is severely flawed and lacking public consultation strategy. The application includes a plan to blast for turbine foundations and place 185 metre (607 feet) high wind turbines within 650 metres of people's homes, a plan to drill the Natura 2000 River Nore & River Barrow Special Area of Conservation (SAC) for cabling, a plan to blast three onsite borrow pits in a Sandstone Quartz area of Kilkenny increasing the very real risk to health with silica dust. The application will lead to the permanent felling of approx. 185 acres of carbon sequestering forestry.
- There are six Natura 2000 sites potentially within its zone of influence. Based on the immense level of construction work required for the proposed development, there is a very real risk of damage or pollution occurring to any of these sites. The developer's Environmental Impact Assessment Report identified Castlebanny as a vast and sophisticated network of ecologies living in harmony and relying heavily on each other for survival, including Red Squirrels and Pine Martins and other mammals and bats.
- Three river sources begin in Castlebanny and the area includes a large aquifer that supplies potable water to the locality and nearby towns. Any potential loss of water supply would impact on livestock, crops and farming activities. With this in mind, it would be unwise to re-designate Castlebanny as 'Acceptable in Principle' to large scale Industrial Development.
- Kilkenny is ideally located to deliver on all kinds of renewable energy such as Solar Photovoltaic Farms and Bio-gas energy. The submissions note several examples including a 54 Megawatt solar farm project which is underway at Ballymacarney in Co. Meath and has the potential to power 11,000 houses. Energy export payments to those who install renewable technologies means farms and existing commercial industry in Kilkenny can now benefit from installing renewable energy projects on existing buildings. Ireland with its large agriculture sector is considered the EU member state with the best potential to make use of bio-gas. Bio-gas could unlock a sustainable solution to farm waste management in Kilkenny and provide a double benefit by reducing greenhouse gas emissions from farming and displacing fossil fuels. In the case of Green Generation in Nurney, Co. Kildare, an anaerobic digester plant set up by a local pig farmer uses pig slurry and 23,000 tonnes of food waste a year, generating enough electricity to power 500 homes.
- Any decisions taken now on renewable energy should not be looked back on with regret.
- We can utilise County Kilkenny's unique natural resources while maintaining the core values of Kilkenny's heritage, environmental and biodiversity protection objectives. Large scale industrial wind energy developments should not influence the respected landscape of the county.
- It would seem foolish to proceed with onshore wind farms when PV offers a more suitable alternative for the region.
- The Draft Direction issued by the Minister extend beyond what is reasonable to ensure the Development Plan accords with National Policy.

- The Kilkenny City & County Development Plan can comply with the Interim Guidelines by simply providing a figure in megawatts for the potential wind energy resource already identified.
- There is no requirement for additional areas of the County to be designated.
- The Development Plan does not fail to set out an overall strategy for the proper planning and sustainable development of the area during its lifetime as stated by the Minister.
- The Minister should therefore amend his directive to simply request that a value in Megawatts for the potential wind energy resource in the County is inserted in the plan.

2.4 Other aspects of the Ministerial Direction

2.4.1 Process/legality of Ministerial Direction

KK-C183-8, KK-C183-9, KK-C183-220, KK-C183-271

- The Ministerial Directive makes a mockery of our democracy and public consultation process. Why have the people been ignored and our public representatives not been listened to?
- The Direction extends beyond what is reasonable to comply with national policy. There is no requirement for additional areas to be included as "Acceptable in Principle" to comply with national policy (the Climate Action Plan has set a target of 80% renewable electricity generation). Therefore, the Plan does not fail to set out an overall strategy for the proper planning and sustainable development of the area.
- Compliance with the *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change* can be achieved by providing a figure in megawatts for the potential wind energy resource already identified. The Minister should therefore amend his Direction to request that a value in Megawatts be inserted for the potential wind energy resource in the County.

KK-C183-214, KK-C183-220

- Ministerial interference with the content of a democratically adopted County Development Plan is only permitted in certain closely circumscribed situations. The Minister is not entitled to make a final Direction in terms of the draft he has furnished, as the Council has behaved correctly, and has shown that it is mindful of its obligations. The Council's approach to wind development designations are carefully considered and explained by it.
- The Minister is in error in imputing to the Council a failure to set out an overall strategy for the proper planning and sustainable development of the area, as non-compliance with the Guidelines does not imply a lack of strategy. The recent judgment of Humphreys J. delivered on 5th November, 2021 in the case of *Cork County Council v Minister for Housing, Local Government and Heritage, Ireland, the Attorney General and Notice Party Office of the Planning Regulator* is cited as reference.
- The Minister has provided no scientific or technical evidence for his quite sweeping allegations against the Council. For example, no evidence is offered to substantiate the statement that the reduction in the area designated "Acceptable in Principle" for wind development from 50,000 hectares to 35,000 hectares would make it impossible for the Council to meet its

obligations in respect of renewable energy targets. Examples of the output of some large scale renewable projects are included in the submission for illustration.

- The vast bulk of the County is in fact potentially available for renewables, specifically wind. Only a small proportion of the County is designated as “Not Normally Permissible”. There is no legal justification for insisting that it is not open to the Council to favour small scale wind turbine developments in designated areas of the County. The national policy and strategy is not focused exclusively on large scale wind turbine development. The Council is entirely entitled to make the decision it has made in this respect.
- The Minister is wrong in his accusation that the Council have not abided by binding guidelines and has not demonstrated how this failure to abide by guidelines has occurred.
- As the National Renewable Energy Action Plan 2010, the Government’s Strategy for Renewable Energy 2012 – 2020, the Interim Guidelines on Climate Change and the 2006 Wind Energy Development Guidelines were not subjected to Strategic Environmental Assessment, they have no legal force,- see cases *D’Oultremont v Region Wallonne Case C-290/1* and *A & Others v Gewestelijke stedenbouwkundige ambtenaar van het departement Ruimte Vlaanderen, afdeling Oost-Vlaanderen Case C-24/19*. As the Minister invokes and relies on these policy documents, the Council cannot be obliged to abide by any such requirements.
- The Minister’s letter is devoid of any acknowledgment of the constitutionally protected role of local government under Art. 28A of Bunreacht na hÉireann in providing a forum for the democratic representation of local communities.
- Submission asks that the letter outlining the legal submissions be provided in full by the Chief Executive to the OPR, and be provided in full by the OPR to the Minister².

2.5 Submissions from wind energy stakeholders

Coillte KK-C183-153

- Concurs with the draft Ministerial Direction and the three reasons contained therein.
- Delivery of onshore wind is key to meeting commitments in the National Development Plan 2021 – 2030 (increased Ireland’s renewable electricity target from 70% to 80% by 2030) and the 2021 Climate Action Plan (CAP 2021) of 5th November, 2021.
- The inclusion of the strategic aim to generate 100% of electricity demand through renewables, without the inclusion of the areas named in the Draft Direction, renders the Plan flawed.
- The potential wind energy development in MW on lands designated ‘acceptable in principle’ in the Plan (circa 35,000ha) equates to circa 86MW only.
- Commend Kilkenny County Council for including a 100% county target.
- Submission notes and respects the local plan making process and that this must uphold national policy in the CAP 2021 including onshore wind targets.

EDF Renewables KK-C183-227

² The full text of submission reference KK-C184-214 is available, along with all other submissions, at <https://consult.kilkenny.ie/en/node/5380/submissions>

- The current references to wind energy projects greater than 5MW as “large-scale” and limited to areas designated “Acceptable in Principle” is inappropriate and an artificial restriction, and will effectively prevent the development of any wind energy projects in areas designated as “Open for Consideration.” This in turn will hinder Kilkenny’s ability to contribute to national renewable energy targets and act as an inappropriate precedent for County Development Plans around the country.
- If individual sites are capable of demonstrating that significant adverse impacts will not arise on identified environmental sensitivities in the Wind Energy Strategy, including landscape and residential amenities, it should be considered on its own merits.

Art Generation KK-C183-251

- The Draft Direction recognises that the adopted Plan will result in no further renewable development of required scale on the suitable sites in the county. The Plan fails to set out clearly how its policies and designations for renewable energy will contribute to the national renewable energy targets and fails to provide an adequate land area in the ‘acceptable in principle’ category to deliver a sufficient wind energy quantum and removes specific targets in the Draft Plan to generate 100% / 70% of electricity demand from renewables by 2030. The Plan defines impractical rules for ‘open for consideration’ areas which are not evidence based and in effect stymie wind development. An analysis carried out by MKO Planning & Environmental Consultants in April, 2021 concluded that only 1.4% of the available area of the county was available for wind energy development.

Wind Energy Ireland KK-C183-254

- Submission fully supports the draft Ministerial Direction and the three reasons provided.
- It is highly likely that renewable energy ambition levels will continue to increase over the course of the decade.
- Agree that the adopted Plan has failed to identify renewable energy targets (in MW) and to comply with item 2 of the Specific Planning Policy Requirement, (SPPR) as the Plan has not indicated the wind energy production and the potential wind energy resource (in MW) as required in the SPPR.
- The inclusion of the strategic aim to generate 100% of electricity demand through renewables while omitting the areas named in the draft direction leaves the Plan inconsistent and fails to provide an overall strategy for the proper planning and development of the area of the Plan.
- Submission notes the restrictions on the ‘Open for Consideration’ lands, where wind energy projects greater than 5MW / 5 turbines are designated as “large-scale” and are excluded from areas designated ‘Open for Consideration’. This definition is inappropriate and will prevent any commercial development of wind projects in these areas, hindering Kilkenny’s ability to contribute to national renewable energy targets.
- An analysis undertaken by their members (included in the submission on the Material Amendments) found that the potential wind energy development in MW on lands designated ‘Acceptable in Principle’ in the Plan (circa 35,000ha total) in reality equates to circa 86MW only and this is a significant over-estimate because of the high attrition rate associated with the development of wind energy projects.
- The 100% County target is welcomed and reflects the supportive and ambitious policy necessary to progress national targets.

Springfield Renewables KK-C183-255

- Submission notes at the outset that Springfield Renewables Ltd has specific commercial and development interests in the County (Castlebanny Wind Farm).
- Submission fully supports the draft Ministerial Direction.
- Support the Minister in that the adopted Plan has failed to identify renewable energy targets (in MW) and to comply with item 2 of the Specific Planning Policy Requirement (SPPR) as the Plan has not indicated the wind energy production and the potential wind energy resource (in MW) as required in the SPPR.
- The inclusion of the strategic aim to generate 100% of electricity demand through renewables while omitting the areas named in the Draft Direction leaves the Plan inconsistent and fails to provide an overall strategy for the proper planning and development of the area of the Plan.
- Submission notes the restrictions on the 'Open to Consideration' lands where wind energy projects greater than 5MW / 5 turbines are designated as "large-scale" and are excluded from areas designated 'Open to Consideration' resulting in an elimination of the ability to develop commercial wind projects on such lands.
- Submission respects the local plan making process and that this must uphold national policy, otherwise national policy becomes defunct and meaningless.

3 Summary of Elected Members' Views

TUAIRIMÍ CHOMHALTAÍ TOFA CHOMHAIRLE CONTAE CHILL CHAINNIGH

Ó CHRUINIÚ SPEISIALTA A TIONÓLADH DÉ LUAIN, 6 NOLLAIG 2021

VIEWS OF THE ELECTED MEMBERS OF KILKENNY COUNTY COUNCIL FROM SPECIAL MEETING HELD ON MONDAY, 6TH DECEMBER, 2021

Cllr Patrick O'Neill:

- Neither the Elected Members, Executive or the public wanted to get to this point - a Ministerial Direction on this issue.
- A significant amount of time and effort was invested by everyone in preparing the City & County Development Plan - our Plan for our people.
- What was adopted in the Development Plan in relation to wind energy is sensible and achievable - there is plenty of scope for wind development.
- Not anti-wind energy but the 100% renewable energy target is too ambitious, being asked to over achieve in the short term.
- National policy is still only in draft format and needs to be updated - understands this is at least 2 years away, no legislation in place for off shore. In the meantime, local division is being created, local landscapes need to be protected and local communities are being damaged while national politicians get their act together.
- Off-shore wind is more productive and should be the focus of National Policy.

Cllr Joe Lyons:

- We all agree that renewable energy is needed to reduce our carbon footprint.
- However, the scale of wind turbines proposed at Castlebanny would be a blight on the landscape, heritage and tourist value of the area, adversely impact on wildlife and equine businesses and devalue land/house properties.
- It is not clear what impact such wind farm developments have on water supply and water quality. The River Arrigle runs through Castlebanny and wind turbine development will impact on it.
- The proposed height of wind turbines is a huge issue for local people; the proposed distance from their homes and the number of turbines permissible in an area – these are issues for communities.
- Wind velocity in Ireland has reduced in recent years, island nation should have a whole process around off shore, no legislation in place for off shore.
- Ireland has highest concentration of on-shore wind farm developments in the world - Government needs to look more at off-shore wind that are 10 km from the coast as opposed to just 500m from a home.

- Turbines – can they be recycled when no longer required, what will happen with unused turbines in years to come.
- There are 723 submissions received on the draft Direction and these people must be listened to.
- We have to stand up for local communities.

Cllr Michael Doyle:

- One of the main functions of the Council is to adopt a Development Plan that represents the views of the people, Councillors represent the people.
- Has a huge concern about the way the OPR is getting involved and what is being proposed, wishes/concerns of people in the areas must be respected.
- The wind strategy as adopted in the Development Plan needs to remain in place as it reflects the views of the people and it provides plenty of scope for wind farm developments, decision of Elected members on Development Plan should stand.
- There are no proper guidelines or policy in place for wind energy and it is not right that local authorities and An Bord Pleanála are being asked to make decisions without policy/legislation in place in this regard.
- Is personally in favour of wind energy developments but they need to be smaller in size and scale.
- Small existing turbines – are they obsolete.

Cllr Pat Dunphy:

- Agrees with previous speakers.
- Local democracy cannot be ignored or undermined by the OPR, high number of submissions received.
- There are too many local people opposed to wind farm developments in their area, so such developments need to be diverted to areas where they are acceptable and more suitable.
- Disappointed on decision from OPR and direction from Minister, bad day for democracy.
- Covid impacted people's ability to engage in the public consultation process for the Development Plan. They were unable to attend face-to-face meetings where they could get across their frustration at wind farm developments.
- 21 Turbines of 185m in height and only 500m from people's homes is unacceptable.
- The Government expect that twice as much energy will be generated by off-shore wind developments than on-shore yet there are very little off-shore developments in progress.
- Some other counties don't appear to have made much provision for wind energy in their Development plans so why is Kilkenny being targeted? Divide targets among all counties.
- How can we be expected to make decisions without definitive policy on wind energy?
- A huge area of the County is designated as 'Open for Consideration'.
- The unique heritage and tourism value of Knockroe Passage Tomb/Tullahought will be adversely impacted if wind turbines are allowed in areas such as Owning Hill and Mullinbeg.
- Totally supportive of what was adopted in the Development Plan and hopes Minister will listen to local democracy.
- Whole country needs renewable energy not only some areas.

Cllr Eamon Aylward:

- Agrees with previous speakers.
- Public have been involved in an extensive consultation process and they have made their submissions, made their views known.
- We are democratically Elected by the people, we represent them and we need to listen to them.
- OPR stepping beyond his role- where is democracy?
- 100% agree with the adopted Development Plan and not for changing.
- Good Development Plan – progressive Plan accepted by all.

Cllr Maria Dollard:

- Supports the development of wind energy - wind is our new oil. The world is changing and our energy sources need to change as well.
- The target of 100% of our electricity needs to be met from renewable energy is over ambitious. Target of 80% set by Government is challenging enough.
- We have failed to bring the people with us on renewable energy and there is a disproportionate emphasis on wind energy relative to all of the other forms of renewable energy.
- Size and scale - Industrial scale wind farm developments only create fear, concern and anger among local communities.
- Deeply concerned that the local objection to industrial scale wind energy developments will become objection to all forms of renewable energy, perception among the public that windfarms are the only source.
- We need a renewable energy strategy that works for everyone, that brings the people with us and that everyone can benefit from.
- Other renewable energy strategy must have combination of different renewable energy sources.

Cllr Eugene McGuinness:

- Annoyed that it has come to this.
- Kilkenny County Council have been handed a poisoned chalice. Oireachtas Members have failed to do their job and we should hand the chalice back to them. OPR should be interested in implementing Government Policy. Oireachtas not making Guidelines.
- Windfarm Companies offering inducements to solve green energy requirements.
- Large wind turbines 185 metres are a complete and utter blight on the landscape, impact on communities.
- Turbine syndrome is now leading to legal cases in France and elsewhere in Europe. What will happen if similar legal cases are brought in Kilkenny if these largescale wind developments are allowed go ahead.

Cllr Matt Doran:

- Agrees with previous speakers.
- Wants in particular to express his concern about the Lingaun Valley - one of the most beautiful areas in the County. It needs to be protected.

Cllr. Joe Malone:

- Supports all previous speakers.
- Development Plan is owned by Kilkenny not OPR.
- Have to listen to the people and the communities.

Cllr Deirdre Cullen:

- Supports all previous speakers.
- We are not doing our job as Elected Members if we do not listen to those people directly impacted by wind energy developments. They have real concerns.
- The renewable energy targets of 80% should be achieved by other renewable energy sources rather than being front-loaded by wind energy.
- There should not be any wind turbines allowed near Knockroe Passage Tomb. Negative impact on this scenic area. They wouldn't be allowed near Newgrange.
- OPR must take note of local knowledge.
- Fully supports the adopted Development Plan - not for changing.

Cllr Mary Hilda Cavanagh:

- Wants to fully endorse comments by previous speakers.
- We didn't make decision in adopting the County Development Plan lightly - we consulted widely and we listened to the people and reflected the will of the people.
- It is unfair to local democracy if OPR is allowed to overturn what has been agreed by the Elected Members.
- Need to protect our national beauty.
- Don't want commercial wind turbines on the highest hills in Kilkenny.
- We should co-operate with neighbouring Counties where there are large-scale wind farms visible from County Kilkenny such as in Templetuohy and Lisdowney. These should be considered to contribute to Kilkenny's renewable energy targets of 80%.
- Just because technology is available to build larger turbines doesn't mean that it should be followed. Smaller turbines are less obtrusive and more acceptable to local people. Large turbines should be out at sea.

Cllr Michael Delaney:

- Concurs with colleagues who have spoken.
- Tullaroan is surrounded by wind farm developments.
- We have to go green but we should only consider wind turbines where they are suitable and where there are no issues or concerns. Must not impact on our heritage areas.

Cllr Denis Hynes:

- It is only when you see first-hand a large-scale wind turbine and speak to the people that live near them that you can understand the negative impact they have on wildlife, quality of life and the value of people's homes.
- Concerns from public is reflected in the huge number of submissions.
- Need to consider off shore.
- Not going to cede to pressure from the OPR. Pressure needs to be applied at national level and look at other sources of energy.

Cllr John Brennan:

- Agrees with previous speakers.
- There will have to be alternative sources of energy in future but we have to listen to the people and respect their views.
- Need to preserve/maintain local communities and their scenic areas.
- We need to work with the people in local communities that are concerned about the height of turbines - they are too tall.
- More leadership needs to come at national level on decisions - local Councillors are being left out to dry.

Cllr Pat Fitzpatrick:

- Councillors need to stand together with our local communities on this issue.
- Wind farms cannot be forced on local communities. They have a negative impact on equine businesses. Concerns of communities must be listened to.
- Wind is not a reliable source of energy as wind velocity reduces during the summer months.
- We should talk to other Counties who are more in favour of wind and off set our obligations.
- There is no clear Government policy or guidelines on wind energy. There is also no clarity on off-shore wind.
- Oireachtas Members and Department Officials should be dealing with policies.

Cllr Tomás Breathnach:

- The Development Plan is the vision and roadmap for the Council over the next 6 years. The Council has put a lot of time into the whole process of adopting a Plan for the County.
- It contains the criteria, guidance and rule book by which we will judge the success or otherwise of our activity.
- It involved a lengthy process of engagement of almost 3 years. During that time the national targets on electricity generation from renewable energy appear to have changed from 70% at the start of the Plan to 80% in revised Climate Action Targets announced last September.
- The Council needs to be able to consider this revised target (additional 10%) rather than have it imposed on us.
- 100% is a laudable target, but we need to work over time to achieve this, technology is changing and there are different sources of renewable energy.
- Renewable energy is vital for our County to 2030 and 2050.
- The Ministerial Direction is not of our making. It came to us at the last minute on 15th October and the public consultation process was rushed into a very short period of time - after almost 3 years of drafting the Development Plan. That is a very disappointing outcome.
- Acknowledges everyone that got involved in the process.

Cllr Ger Frisby:

- Wants to thank the public for their time and effort in responding to this issue.
- They are the loudest voices that have spoken and they need to be heard and taken on board by the Elected Members.
- Areas of the County where natural beauty and heritage have been preserved for hundreds and thousands of years cannot now be impacted.
- There are other ways of meeting our renewable energy targets without imposing wind turbine monstrosities on local people.
- Local democracy is being eroded by this Direction.

Cllr Fidelis Doherty:

- Hydropower should be harnessed to help generate renewable energy. We have a lot of rivers throughout the County.
- 100% target should be reduced to 80%.
- Additional 10% from 70% to 80% - members should be given time to consider.
- Need to protect Knockroe, Lingaun Valley and scenic views across Kilkenny and Tipperary.

4 Summary of Southern Regional Assembly (SRA) Submission KK-C183-259

The submission from the Southern Regional Assembly refers back to the submission made in connection with the Material Amendments to the Draft Plan. That submission was wide ranging but the section relevant to Chapter 11 on wind energy is as follows:

The SRA asks that the final Plan should have the policy approach objectives (and targets) that can be applied in the Plan to contribute towards the achievement of the Climate Action Plan.

Concern is expressed at the removal of large sections of the draft Plan content on wind energy and the amendments to Figure 11.4 wind strategy areas indicating an expansion of areas in the County where wind energy proposals will “not normally be permitted”. The concern relates to the extent of the proposed material alterations which would weaken the Development Plan response to Climate change.

5 Recommendation on the Best Manner to Give Effect to the Draft Direction

5.1 Targets

The draft direction requires the identification of 201 MW renewable energy to meet the objective for the generation of 100% of electricity needs from renewable sources. This figure was initially proposed in the Draft Development Plan (Section 11.5.1). For the Draft Development Plan, a 20% increase in electricity demand to 2030 was taken, giving a required output of 201Mw from renewable energy resources. Since the publication of the Draft Development Plan, revised electricity demand figures for the Country have been published in the Eirgrid Capacity statement³.

The Planning Department has reviewed the demand figures with 3CEA and concluded on the basis of the most recent demand statement that the:

Total Electricity forecast demand for County Kilkenny in 2030	= 758 GWh
Current Electricity demand in County Kilkenny	= 530 GWh
Current Renewable electricity output in County Kilkenny	= 189 GWh
Renewables capacity for requirement for 2030 in Co. Kilkenny	= 569 GWh (758-189)

Assuming that all of that renewable energy is produced through wind gives a required output of 228Mw. This equates to an additional 46 turbines of 5Mw each.

Assuming that all of that renewable energy is produced by solar gives a required output of 499Mw (An additional 102 solar farms of 8ha (20 acres) each).

At present planning permission exists for 14 solar projects of various sizes with a potential to deliver 114GWh. Assuming that this will be delivered up to 2030 gives a required wind output of 455GWh (i.e. 569-114= 455GWh).

This is the equivalent of 182Mw of wind power which can be provided for by 37 turbines of 5Mw each.

In order to achieve these revised figures, it is recommended that the following text be inserted in the Adopted Plan as Section **11.4 Kilkenny Targets** which includes for updated figures and appropriate revised text as follows:

³ Eirgrid Energy Capacity Statement 2021 – 2030

11.4 Kilkenny Targets

In line with the Council's strategic aim, this Renewable Energy Strategy aims to enable Kilkenny to generate a minimum of 100% of its electricity needs from renewable sources by 2030. The 3 Counties Energy Agency (3CEA), covering the counties of Carlow, Kilkenny and Wexford, has estimated that by 2030, County Kilkenny will use 758 Gigawatt hours⁴ (Gwh) of electricity. The current renewable energy output within County Kilkenny is 189GWh. Therefore, there is a requirement to generate the equivalent of an additional 569GWh of electricity in the County.

Assuming that all of that renewable energy is produced through wind would give a required output of 228Mw. This equates to an additional 46 turbines of 5Mw each.

Assuming that all of that renewable energy is produced by solar will give a required output of 499Mw (An additional 102 solar farms of 20 acres each).

Planning permission exists for 14 solar projects⁵ of various sizes with a potential to deliver 114GWh.

Assuming that this will be delivered up to 2030 gives a required wind output of $569 - 114 = 455$ GWh

That translates into an additional 182 Mw of wind energy or 37 additional turbines of 5Mw.

Objective:

11C To meet 100% of electricity needs for Kilkenny from renewable sources by 2030, including Wind energy, Solar energy and bio energy and to work with agencies, including the 3CEA to proactively achieve this target.

⁴ Calculations provided by 3CEA Nov. 2021

⁵ Planning register KCC Nov. 2021

Similarly, in order to accommodate the revised electricity demand figures, the text of Section 11.5.1 is recommended to incorporate updated figures and minor changes to the original text as follows:

11.5.1 Current status and Targets

In line with the Council's strategic aim, this Renewable Energy Strategy aims to enable Kilkenny to generate the equivalent of 100% of its electricity needs from renewable sources by 2030, including wind energy at 182 Mw and solar energy at 100Mw. According to the Three Counties Energy Agency, 3CEA by 2030 the electricity demand for County Kilkenny is expected to be 759GWh. The gap to meeting the target through all renewable energy resources is currently 569GWh.

Assuming generation of 114 GWh by 2030 through solar energy⁶ this leaves 455GWh to be generated by wind. This equates to approximately 37 new 5MW turbines, representing 182 MW in output. It is however expected that the renewable energy target will be met by a mix of renewable energies, in which solar will play a significant role (see Section 11.6 Solar Energy).

Table 11.2: Approved Wind Farms in Kilkenny

Wind Farm name	Applicant	Townland	No. Turbines	Total output in MW
Bruckana	Bord na Mona	Rathpatrick, Bruckana & Baunmore, Johnstown	8	20
Foylature	Art Generation	Foylature, Courtstown, Tullaroan	7	12
Ballybeagh	ART Generation Ltd.	Ballybeagh, Tullaroan	7	13.8
Ballymartin Phase 1	ART Generation Ltd./Bord Gais Energy	Ballymartin, Smithstown	3	7
	Paul Martin			
Ballymartin Phase 2	Bord Gais Energy	Smithstown, Tullogher	1	9.2
	ART Generation Ltd.		3	
Rahora	Ecopowers Developments Ltd.	Guillkagh More, Brownstown	5	4
Lisdowney Community	Matt Bergin and Thomas McEvoy	Lisdowney Ballyragget		9.2
			4	
Ballinclare	Michael Aylward	Glenmore	1	0.5
		Total	39	75.7

⁶ 14 permitted solar schemes within County Kilkenny

Rationale for County Development Plan Policy

The Council, in the preparation of its Renewable Energy Strategy including wind, took a strategic approach to the spatial distribution of wind energy developments.

This approach allows for:

- The management of the predicted expansion of renewable energy, while ensuring that Kilkenny contributes to national targets,
- The areas with greatest potential to be identified and deemed eminently suitable for windfarm.,
- Limiting the extent of developments across the county.
- Certainty as to the preferred areas for wind energy developments for everybody.
- Directs investment to the identified areas.
- Prohibits the potential random scattering of significant developments.
- Gives more certainty to the industry in bringing proposals forward.

To secure the the required outputs the Council has had regard to:

- The current Guidelines on Windfarm Development 2006,
- The Draft Guidelines on Wind Energy 2019,
- The Interim Guidelines for Planning Authorities containing the SPPR of 2017,
- The Climate Action Plan,
- The development management standards set out in the Kilkenny City & County Development Plan 2021 – 2027.
- The potential challenges in bringing significant wind energy developments to fruition,
- The need for public sector leadership in the shift to a carbon neutral society.

It is considered that the 100% county target reflects the supportive, and ambitious policy taken by Kilkenny County Council to progress national targets within the county.

In the Draft Plan, the Council proposed strategic areas of approximately 50,000 hectares within the County where large scale wind energy developments would be “acceptable in principle”.

This is considered reasonable and practicable in order to facilitate the required level of wind farm development, having regard to all the variables involved in progressing wind energy developments.

Draft Direction Fig 11.4

Having regard to the foregoing rationale it is therefore recommended that Figure 11.4 be amended as per section 2(b) of the draft Direction, i.e.

Amend the adopted wind energy strategy map (reference Figure 11.4) as follows:

- i. Reinstate areas designated at Templeorum/Mullenbeg to ‘acceptable in principle.’
- 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. (see map p.31)

6 Summary and Conclusion

This report sets out:

1. A summary of the views of persons who made submissions, (Section 2, p.6-15)
2. A summary of the views and recommendations of the Elected Members, (Section 3, p.16-21)
3. A summary of the views and recommendations of the Regional Assembly (Section 4 p.22)
4. Makes recommendations in relation to the best manner in which to give effect to the draft direction. (Section 5, p.23)

In compiling this report, I have had regard to the following:

- i. Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended) including the *Wind Energy Development Guidelines* (2006) and *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change* (July 2017).
- ii. The obligations under Planning and Development Act 2000 (as amended).
- iii. Submissions received on foot of public consultation in respect of the draft Ministerial Direction.
- iv. The views of the Elected Members of Kilkenny County Council expressed at the Special Meeting of Kilkenny County Council held on 6th December 2021,
- v. The Climate Action Plans 2019⁷ and 2021⁸.

and further, having regard to the previous advice provided by me at the meetings of Kilkenny County Council to consider the *Chief Executive's Report on the Draft Kilkenny City and County Development Plan* (8th June 2021) and the *Chief Executive's Report on the Proposed Material Alterations to the Draft Kilkenny City and County Development Plan* (3rd September 2021), it is considered that the best manner in which to give effect to the draft direction is to amend the Kilkenny City and County Development Plan 2021 – 2027 as follows:

⁷ Government of Ireland, *Climate Action Plan*, 2019

⁸ Government of Ireland, *Climate Action Plan*, November 2021

Direction:

(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.

Chief Executive's Recommendation:

The following to be inserted as sections 11.4 and 11.5.1 of the Plan.

11.4 Kilkenny Targets

In line with the Council's strategic aim, this Renewable Energy Strategy aims to enable Kilkenny to generate a minimum of 100% of its electricity needs from renewable sources by 2030. The 3 Counties Energy Agency (3CEA), covering the counties of Carlow, Kilkenny and Wexford, has estimated that by 2030, County Kilkenny will use 758 Gigawatt hours⁹ (Gwh) of electricity. The current renewable energy output within County Kilkenny is 189GWh.

Therefore it would be a requirement to generate the equivalent of an additional 569GWh of electricity in the County.

Assuming that all of that renewable energy is produced through wind will give a required output of 228Mw. This equates to an additional 46 turbines of 5Mw each.

Assuming that all of that renewable energy is produced by solar will give a required output of 499Mw (An additional 102 solar farms of 20acres each).

Planning permission exists for 14 solar projects¹⁰ of various sizes with a potential to deliver 114GWh. Assuming that this will be delivered up to 2030 gives a required wind output of 569-114= 455GWh

That translates into an additional 182 Mw of wind energy or 37 additional turbines of 5Mw.

Objective:

11C To meet 100% of electricity needs for Kilkenny from renewable sources by 2030, including Wind energy, Solar energy and bio energy and to work with agencies, including the 3CEA to proactively achieve this target.

⁹ Calculations provided by 3CEA nov 2021

¹⁰ Planning Register KCC Nov 2021

11.5.1 Current status and Targets

In line with the Council's strategic aim, this Renewable Energy Strategy aims to enable Kilkenny to generate the equivalent of 100% of its electricity needs from renewable sources by 2030, including wind energy at 182 Mw and solar energy at 100Mw. According to the Three Counties energy Agency, 3CEA by the 2030 the electricity demand for County Kilkenny is expected to be 759GWh. The gap to meeting the target through all renewable energy resources is currently 589GWh. Assuming generation of 114 GWh by 2030 through solar energy¹¹ this leaves 455GWh to be generated by wind. This equates to approximately 37 new 5MW turbines, representing 182 MW in output. It is however expected that the renewable energy target will be met by a mix of renewable energies, in which solar will play a significant role (see solar below section 11.8).

Table 11.2: Approved Wind Farms in Kilkenny

Wind Farm name	Applicant	Townland	No. Turbines	Total output In MW
Bruckana	Bord na Mona	Rathpatrick, Bruckana & Baunmore, Johnstown	8	20
Foylature	Art Generation	Foylature, Courtstown, Tullaroan	7	12
Ballybeagh	ART Generation Ltd.	Ballybeagh, Tullaroan	7	13.8
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	Paul Martin			
Ballymartin Phase 2	Bord Gais Energy	Smithstown, Tullogher	1	9.2
	ART Generation Ltd.		3	
Rahora	Ecopowers Developments Ltd.	Guillkagh More, Brownstown	5	4
Lisdowney Community	Matt Bergin and Thomas McEvoy	Lisdowney Ballyragget		9.2
			4	
Ballinclare	Michael Aylward	Glenmore	1	0.5
		Total	39	75.7

¹¹ 14 permitted solar schemes within County Kilkenny

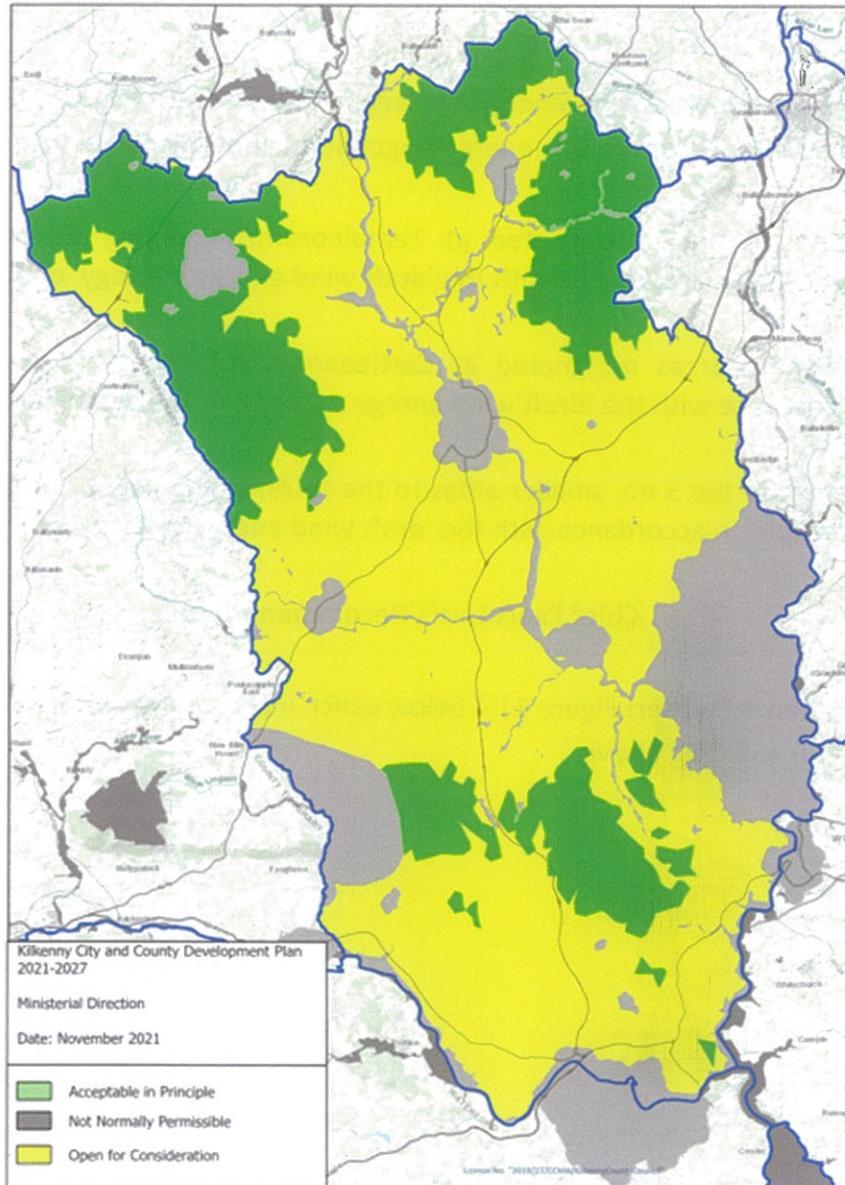
Direction

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.

Chief Executive's Recommendation:

The recommendation is to insert Figure 11.4 below which incorporates the areas identified in paragraphs C(i),C(ii) and C(iii) above.



Colette Byrne

Colette Byrne
Chief Executive

Appendices

Appendix A Draft Direction

DRAFT DIRECTION IN THE MATTER OF SECTION 31
OF THE PLANNING AND DEVELOPMENT ACT 2000 (as amended)
Kilkenny City & County Development Plan 2021-2027

“Development Plan” means the Kilkenny City & County Development Plan 2021-2027

“Planning Authority” means Kilkenny County Council

WHEREAS the powers and duties of the Minister for Housing, Local Government and Heritage under the Planning and Development Act 2000 (as amended), other than the power to prosecute an offence, have been delegated to the Minister of State for Local Government and Planning pursuant to the Housing, Planning and Local Government (Delegation of Ministerial Functions) (No. 2) Order 2017 (S.I. 352 of 2017).

WHEREAS the Minister of State at the Department of Housing, Local Government and Heritage in exercise of the powers conferred on him by section 31 of the Act 2000, and consequent to a recommendation made to him by the Office of the Planning Regulator under section 31AM(8) of the Act hereby directs as follows:

- (1) This Direction may be cited as the Planning and Development (Kilkenny City & County Development Plan 2021-2027) Direction 2021.
- (2) The Planning Authority is hereby directed to take the following steps with regard to the ‘wind energy strategy’ within the Development Plan:
 - 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.

STATEMENT OF REASONS

- I. 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.
- II. 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.
- III. 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.

GIVEN under my hand,

Minister for Housing, Local Government and Heritage

day of October, 2021.

Appendix B List of submissions received

List of submissions received to the Draft Ministerial Direction to Kilkenny City and County Development Plan 2021-2027

Ref. No	Name/Group
KK-C183-1	Anne Baily
KK-C183-2	Sacha Maxwell
KK-C183-3	Mairéad Sheehan
KK-C183-4	Mary O Shea
KK-C183-5	Noelle Kennedy
KK-C183-6	Tullahought Community Development Ltd
KK-C183-7	Suir Valley Env Group
KK-C183-8	Janet Ging
KK-C183-9	Sarah Ging
KK-C183-10	Fergal Ging
KK-C183-11	Emily Ging
KK-C183-12	Christopher Ging
KK-C183-13	Walter Power
KK-C183-14	Anna Morrissey
KK-C183-15	Tom Morrissey
KK-C183-16	Neal McCormack
KK-C183-17	Denis Deasy
KK-C183-18	Anne O Mahoney
KK-C183-19	Save Our Hills
KK-C183-20	Cian McCormack
KK-C183-21	John O Mahoney
KK-C183-22	Declan Blanchfield
KK-C183-23	Caiseal Conservation Committee
KK-C183-24	Mary Harrington
KK-C183-25	Tony Musiol
KK-C183-26	Eoghan Kinane
KK-C183-27	Catriona Carroll
KK-C183-28	Jessie Teehan
KK-C183-29	Jamie Fennelly
KK-C183-30	Marie Fennelly
KK-C183-31	Susan Forsyth
KK-C183-32	Richard Deasy
KK-C183-33	Pat & Theresa Hearne
KK-C183-34	Mark Wilschut
KK-C183-35	Caroline O'Keefe
KK-C183-36	Sean O'Keefe
KK-C183-37	Max O'Keefe
KK-C183-38	Mia O'Keefe
KK-C183-39	Elaine Fitzgerald
KK-C183-40	Tara Heavey
KK-C183-41	Caroline Cahill
KK-C183-42	Monica Mullen
KK-C183-43	Patrick Mullen
KK-C183-44	Kevin Mullen

KK-C183-45	Siobhan Hughes
KK-C183-46	Patrick Hughes
KK-C183-47	Alicia Hughes
KK-C183-48	Sarai Hughes
KK-C183-49	Aaron Hughes
KK-C183-50	Gerard Hughes
KK-C183-51	Sharon Hughes
KK-C183-52	Naoise Hughes
KK-C183-53	Meabh Hughes
KK-C183-54	Sarah Smyth
KK-C183-55	Josie Allen
KK-C183-56	Reuben Allen Grace
KK-C183-57	Walter Power
KK-C183-58	Darren Mullen
KK-C183-59	Adrian Mullen
KK-C183-60	Shanelle Mullen
KK-C183-61	Aine Ryan Consulting on behalf of Eamon Whelan
KK-C183-62	Jake Mullen
KK-C183-63	Gemma Keogh
KK-C183-64	Thomas Keogh
KK-C183-65	Anthony Heavey
KK-C183-66	Declan Brasil on behalf of Whisperview Trading and Carriganog Racing
KK-C183-67	Rhona Dempsey
KK-C183-68	Willie Dempsey
KK-C183-69	Jack Dempsey
KK-C183-70	Sam Dempsey
KK-C183-71	Anne Maria Laffen
KK-C183-72	Colin Fennelly
KK-C183-73	Laura Bergin
KK-C183-74	Lorraine Maher
KK-C183-75	Claire O' Brien
KK-C183-76	Kayla Maher
KK-C183-77	John O'Brien
KK-C183-78	Shay Maher
KK-C183-79	Jimmy Phelan
KK-C183-80	Carmel Phelan
KK-C183-81	Noel O'Keefe
KK-C183-82	Kitty O'Keefe
KK-C183-83	Patrick Brennan
KK-C183-84	Michael Cullen
KK-C183-85	Tom Fitzpatrick
KK-C183-86	Billy Kiely
KK-C183-87	Brieda Kiely
KK-C183-88	Faith Kiely

Chief Executive's Report on submissions to the Draft Ministerial Direction

KK-C183-89	Irene Kiely
KK-C183-90	Lisa Kiely
KK-C183-91	Martin Kiely
KK-C183-92	Rose Kiely
KK-C183-93	Vincent Kiely
KK-C183-94	Adam Cullen
KK-C183-95	James Cullen
KK-C183-96	Tammi Brennan
KK-C183-97	Lily Brennan
KK-C183-98	Daisy Brennan
KK-C183-99	Thomas Brennan
KK-C183-100	Breda Slane
KK-C183-101	John Dermody
KK-C183-102	Michael & Margaret Fennelly
KK-C183-103	Kathleen O Keefe
KK-C183-104	Anthony Fitzpatrick
KK-C183-105	Katie Fennelly
KK-C183-106	Amanda Fitzpatrick
KK-C183-107	Matthew Fennelly
KK-C183-108	Elaine Cleere
KK-C183-109	Kieran Furlong
KK-C183-110	Thomas Cleere
KK-C183-111	Michael & Valerie Fitzpatrick
KK-C183-112	Claire Cotterell
KK-C183-113	Gillian Griffin
KK-C183-114	Shane O Keefe
KK-C183-115	Harry O Keefe
KK-C183-116	Sam O Keefe
KK-C183-117	Deirdre Walsh
KK-C183-118	Celine Phelan
KK-C183-119	Sarah Knox
KK-C183-120	Neal Heavey
KK-C183-121	Eileen Landy
KK-C183-122	Elaine Grant
KK-C183-123	Abbie Furlong
KK-C183-124	Marian Kendrick
KK-C183-125	Emma Furlong
KK-C183-126	Amy O Mahoney
KK-C183-127	Carmel Furlong
KK-C183-128	Ciara Fennelly
KK-C183-129	Kathleen Corcoran
KK-C183-130	John Corcoran
KK-C183-131	Shane Kendrick
KK-C183-132	Pat & Theresa Hearne
KK-C183-133	Antoin O Niell
KK-C183-134	Breda Deasy
KK-C183-135	Denis Murray

KK-C183-136	Saraid Murray
KK-C183-137	Aodan Murray
KK-C183-138	Cliona Gerathy
KK-C183-139	Michelle Cullen
KK-C183-140	Catherine O Brien
KK-C183-141	Frank O Keefe
KK-C183-142	Conor Murphy
KK-C183-143	Tom Moylan
KK-C183-144	Therese Moylan
KK-C183-145	Sean Kennedy
KK-C183-146	Laurie Moylan
KK-C183-147	Eva Moylan
KK-C183-148	Eric Dignan
KK-C183-149	Jim O Brien
KK-C183-150	Larry O Niell
KK-C183-151	Ann Delahunty
KK-C183-152	Bernadett O Niell
KK-C183-153	Coillte
KK-C183-154	Djana Ponder
KK-C183-155	Noleen Bookle
KK-C183-156	Thomas Bookle
KK-C183-157	Kyle Bookle
KK-C183-158	Lauren Bookle
KK-C183-159	Tom Grace
KK-C183-160	Eugene Duggan
KK-C183-161	Mary Duggan
KK-C183-162	Miriam O Niell
KK-C183-163	Rebecca Duggan
KK-C183-164	Amy Duggan
KK-C183-165	Angela Walsh
KK-C183-166	Paul Walsh
KK-C183-167	David Walsh
KK-C183-168	Seamus Walsh
KK-C183-169	Grace Fennelly
KK-C183-170	John O Shea
KK-C183-171	Natasha Drennan
KK-C183-172	John Drennan
KK-C183-173	Eoin Long
KK-C183-174	Paula McGrath
KK-C183-175	Dave McGrath
KK-C183-176	Liam McGrath
KK-C183-177	Aoife McGrath
KK-C183-178	Jenny Harrington
KK-C183-179	Edward O Niell
KK-C183-180	Lisa Alyward
KK-C183-181	Maureen Heavey
KK-C183-182	Mark Collins

Chief Executive's Report on submissions to the Draft Ministerial Direction

KK-C183-183	Patricia Morohan
KK-C183-184	Leo Callery
KK-C183-185	Eamon Bookle
KK-C183-186	Linda Fitzpatrick
KK-C183-187	Marianne Callery
KK-C183-188	Pat O Gorman
KK-C183-189	Joan O Gorman
KK-C183-190	Edwina Lawlor
KK-C183-191	Breda O Dywer
KK-C183-192	Aine
KK-C183-193	Ann Marie O Brien
KK-C183-194	Richard O Brien
KK-C183-195	Lucy Cahill
KK-C183-196	Dean Mason
KK-C183-197	Patrick Bookle
KK-C183-198	Dara Mason
KK-C183-199	Trish Morohan
KK-C183-200	Andrew Murphy
KK-C183-201	Niamh Reynolds
KK-C183-202	Christina Walsh
KK-C183-203	Alexander Walsh
KK-C183-204	Jack Walsh
KK-C183-205	Conor Walsh
KK-C183-206	Megan Walsh
KK-C183-207	Callum Walsh
KK-C183-208	Kari Alyward
KK-C183-209	Richard Walsh
KK-C183-210	Kieran O Driscoll
KK-C183-211	Pauline Fitzpatrick
KK-C183-212	Ann Connolly
KK-C183-213	John Phelan
KK-C183-214	NOONAN LINEHAN CARROLL COFFEY LLP SOLICITORS on behalf of Save Sth Leinster Way
KK-C183-215	Shane Alyward
KK-C183-216	Save Our Hills
KK-C183-217	Save Our Hills
KK-C183-218	Stephen Keogh
KK-C183-219	James Deasy
KK-C183-220	Save the South Leinster Way Group
KK-C183-221	Martin Doheny
KK-C183-222	Paschal Connolly
KK-C183-223	Linguan Valley Tourism
KK-C183-224	Patrick & Juliann Drennan
KK-C183-225	Michael Fitzpatrick
KK-C183-226	Michael Fitzpatrick Jnr

KK-C183-227	EDF Renewables
KK-C183-228	Rachel Barron
KK-C183-229	Tresa Barron
KK-C183-230	Richard Barron
KK-C183-231	Ellen McCormack
KK-C183-232	Darren McCormack
KK-C183-233	Conor McCormack
KK-C183-234	Ava McCormack
KK-C183-235	Mary Molloy
KK-C183-236	John Lawlor
KK-C183-237	Kian Molloy
KK-C183-238	Claire Molloy
KK-C183-239	David Molloy
KK-C183-240	Jacinta O Brien
KK-C183-241	Katie May Boyce
KK-C183-242	Carol Keane
KK-C183-243	Eoin Lawlor
KK-C183-244	Robert Alyward
KK-C183-245	Ivo Wilschut
KK-C183-246	Maragret & Simon Kennedy
KK-C183-247	Eileen Butler
KK-C183-248	Paddy Butler
KK-C183-249	Aisling O Mahoney
KK-C183-250	Janelle O Brien
KK-C183-251	Art Generation
KK-C183-252	Majella Lawlor Kehoe
KK-C183-253	Cindy Alyward
KK-C183-254	Wind Energy Ireland
KK-C183-255	Springfield Renewables
KK-C183-256	Mairin Devlin
KK-C183-257	Scoil Phádraig, Ballyhale
KK-C183-258	Pol Brennan
KK-C183-259	Southern Regional Assembly
KK-C183-260	Michael Boyd
KK-C183-261	Shane Walsh
KK-C183-262	Molly O Keefe
KK-C183-263	Paddy O Keefe
KK-C183-264	Judith Phelan
KK-C183-265	Dermot Early Sheehan
KK-C183-265	David Shee
KK-C183-265	John Sheehan
KK-C183-265	Treasa Sheehan
KK-C183-265	Ben Sheehan
KK-C183-265	Cillian Sheehan
KK-C183-265	Adam Sheehan
KK-C183-265	Ann Sheehan
KK-C183-265	Martina Sheehan

Chief Executive's Report on submissions to the Draft Ministerial Direction

KK-C183-265	Johnathon Wall
KK-C183-265	Therese Wall
KK-C183-265	Noel Sheehan
KK-C183-266	Jamie Fennelly
KK-C183-266	Maebh Hearne
KK-C183-266	Conor Hearne
KK-C183-266	Robert Pearson
KK-C183-266	Orla Munroe
KK-C183-266	Anita Foley
KK-C183-266	Pamela Frisby
KK-C183-266	John Frisby
KK-C183-266	Joseph O'Brien
KK-C183-266	Marie Fogarty
KK-C183-266	Nioamh Phelan
KK-C183-266	Olivia Kennington
KK-C183-266	Pat Hearne
KK-C183-266	Rebecca
KK-C183-266	Aisling Murphy
KK-C183-266	John O'Halloran
KK-C183-266	Aisling Briscoe
KK-C183-266	Denise Champion
KK-C183-266	Paula Begley
KK-C183-266	Siobhan Brophy
KK-C183-266	Mark Anthony McGrath
KK-C183-266	Siobhan Carroll
KK-C183-266	Catherine O'Neill
KK-C183-266	Mary Downey
KK-C183-266	Marie Fitzgerald
KK-C183-266	Wyn Mathias
KK-C183-266	Sarah Walshe
KK-C183-266	Lorraine Walsh
KK-C183-266	Cathal Phelan
KK-C183-266	Kevin Walsh
KK-C183-266	Paudie O'Gorman
KK-C183-266	Aileen Roche
KK-C183-266	Annie Drohan
KK-C183-266	Sean Kerin
KK-C183-266	Marie Duggan
KK-C183-266	Aiden Slane
KK-C183-266	John Corcoran
KK-C183-266	Kathleen Corcoran
KK-C183-266	Marian Kendrick
KK-C183-266	Alana Kophamel
KK-C183-266	Dave Fingleton
KK-C183-266	Mary O'Shea
KK-C183-266	Robert Duggan
KK-C183-266	Martina Power

KK-C183-266	James Miller
KK-C183-266	John Maher
KK-C183-266	John Duggan
KK-C183-266	Anna Ryle
KK-C183-266	Fiona Purcell
KK-C183-266	Tom Gartland
KK-C183-266	Lisa Walsh
KK-C183-266	Joe Dunne
KK-C183-266	Catherine McCarthy
KK-C183-266	EM Power
KK-C183-266	Maurice J Power
KK-C183-266	Geraldine Power
KK-C183-266	A Duggan
KK-C183-266	Cian Ryla
KK-C183-266	Claire Ryle
KK-C183-266	Tommy Ryle
KK-C183-266	Chloe Holden
KK-C183-266	Rob Duggan
KK-C183-266	Tony Jeffrey
KK-C183-266	Robert Blackmore
KK-C183-266	Pat Dunne
KK-C183-266	Aisling Lonergan
KK-C183-266	Mary Drennan
KK-C183-266	Shane Kendrick
KK-C183-266	Margaret Keever
KK-C183-266	Michael Butler
KK-C183-266	Brid O'Gorman
KK-C183-266	Aoibheann Kavanagh
KK-C183-266	Sine Kavanagh
KK-C183-266	Josephine Rohan
KK-C183-266	Ruth Maher
KK-C183-266	John O'Neill
KK-C183-266	Mary Kinsella
KK-C183-266	Patricia O'Dea
KK-C183-266	Anne Bradley
KK-C183-266	Justin Moore
KK-C183-266	Barbara Cooke
KK-C183-266	Teresa Lawlor
KK-C183-266	Louise Purcell
KK-C183-266	Mag Ann O'Shea
KK-C183-266	Jennifer Wong
KK-C183-266	Miriam Reid
KK-C183-266	Pauline O'Shea
KK-C183-266	Shirley Power
KK-C183-266	Margaret Doyle
KK-C183-266	Katrina Dunne
KK-C183-266	Jacqueline Norris

Chief Executive's Report on submissions to the Draft Ministerial Direction

KK-C183-266	Avril Prout
KK-C183-266	Maria McGowan
KK-C183-266	Sandra Murphy
KK-C183-266	Michelle Mullally
KK-C183-266	Anna Leveque
KK-C183-266	Roisin Prendergast
KK-C183-266	Catherine Carroll
KK-C183-266	Carrie Saunderson
KK-C183-266	Carol Lawlor
KK-C183-266	Elaine Fitzgerald
KK-C183-266	Jim Norris
KK-C183-266	Julianne Cody
KK-C183-266	Emma Moran
KK-C183-266	Thomas Howley
KK-C183-266	Sarah Landy
KK-C183-266	Siobhan
KK-C183-266	Niall Power
KK-C183-266	Nicola Briscoe
KK-C183-266	Cathy O Callaghan
KK-C183-266	Margaret Cronin
KK-C183-266	Sarah O Dwyer
KK-C183-266	Louise Power
KK-C183-266	Clare O Sullivan
KK-C183-266	Ed O Reilly
KK-C183-266	Sinead Kenny
KK-C183-266	Anne Purcell
KK-C183-266	Dylan O Gorman
KK-C183-266	Ciara O Dwyer
KK-C183-266	Brenda Kelly
KK-C183-266	Niall Brophy
KK-C183-266	Brid Murphy
KK-C183-266	Robert Kennington
KK-C183-266	Petie Maher
KK-C183-266	Sarah Culleton
KK-C183-266	Clarissa Landy
KK-C183-266	Emer Fitzpatrick
KK-C183-266	Nichola Barry
KK-C183-266	Mary Power Landy
KK-C183-266	Stacey Miller
KK-C183-266	Mairead Sheehan
KK-C183-266	Aisling McEvoy
KK-C183-266	Katherine Russell
KK-C183-266	Joan Cusack
KK-C183-266	Martina O Dwyer
KK-C183-266	Helen C Grant
KK-C183-266	Robert Iddon
KK-C183-266	Melissa Norris

KK-C183-266	Ciara Dignam
KK-C183-266	Mairead O Shea
KK-C183-266	Michael Prendergast
KK-C183-266	Mervyn Briscoe
KK-C183-266	Leanne Butler
KK-C183-266	Colette White
KK-C183-266	Paul Purcell
KK-C183-266	Lorraine Maher
KK-C183-266	Karen Comerford
KK-C183-266	Deirdre Ruane
KK-C183-266	Sharon Dignam
KK-C183-266	Christina O Connell
KK-C183-266	Joe White
KK-C183-266	Caroline Cahill
KK-C183-266	Anne Reid
KK-C183-266	Paschal Cooney
KK-C183-266	Tina Dwyer
KK-C183-266	Owen McMullan
KK-C183-266	Richie Cahill
KK-C183-266	Patsy Kenny
KK-C183-266	Dawn Fox
KK-C183-266	Kathleen Hearne
KK-C183-266	John Hearne
KK-C183-266	Una O Shea
KK-C183-267	Gerry Moran
KK-C183-267	Sean Phelan
KK-C183-267	Louise Kelly
KK-C183-267	Margaret Phelan
KK-C183-267	John Phelan
KK-C183-267	M Cronin
KK-C183-267	Thomas Cronin
KK-C183-267	Claire Cahill
KK-C183-267	Paul Dermody
KK-C183-267	Maragret Barron
KK-C183-267	William Woodgate
KK-C183-267	Martin Walsh
KK-C183-267	Rebecca Linares
KK-C183-267	Nancy Hearne
KK-C183-267	Philomena Cronin
KK-C183-267	Sean Connolly
KK-C183-267	Erica
KK-C183-267	James Hearne
KK-C183-267	Stevie Cahill
KK-C183-267	Anita Cuddihy
KK-C183-267	Patrick Cronin
KK-C183-267	Gillian
KK-C183-267	Amy

Chief Executive's Report on submissions to the Draft Ministerial Direction

KK-C183-267	Glyn
KK-C183-268	Eugene O Sullivan
KK-C183-268	Bob Duggan
KK-C183-268	Riann Dignan
KK-C183-268	Ray Brophy
KK-C183-268	Joey Shore
KK-C183-268	Esther Doyle
KK-C183-268	Orla Cloney
KK-C183-268	Yvonne Dowling
KK-C183-268	Anna Colclough
KK-C183-268	Cuan Dignan
KK-C183-268	Eric Dignan
KK-C183-268	Yvonne Curran
KK-C183-268	Damien Brett
KK-C183-269	Dee Power
KK-C183-269	Claire Grace
KK-C183-269	Eileen Grace
KK-C183-269	Maria Power
KK-C183-269	Leo Power
KK-C183-269	Edel Power
KK-C183-269	Patricia Power
KK-C183-269	Lena Power
KK-C183-269	Seamus Power
KK-C183-269	Maria Power
KK-C183-269	Michael Grace
KK-C183-269	Joan
KK-C183-270	Helen Wall
KK-C183-270	Christian Lloyd Wall
KK-C183-270	Aoye Sheehan
KK-C183-270	Pat Lloyd
KK-C183-270	Dickie Sheehan
KK-C183-270	Keeva Sheehan
KK-C183-270	Carol Ryan Sheehan
KK-C183-270	Matt Kenny
KK-C183-270	Emma Sheehan
KK-C183-270	Alex Lloyd Wall
KK-C183-271	Gary Whelan
KK-C183-271	Conor Whelan
KK-C183-271	Noel Whelan
KK-C183-271	Martin Curran
KK-C183-271	Elizabeth Kinsella
KK-C183-271	Michael Kinsella
KK-C183-271	Brendan Nolan
KK-C183-271	Elizabeth Nolan
KK-C183-271	Richard Nolan
KK-C183-271	Brigid Nolan
KK-C183-271	Ruairi Breen

KK-C183-271	Ray Brophy
KK-C183-271	Andy Whelan
KK-C183-271	Catherine Whelan
KK-C183-271	Grainne Whelan
KK-C183-271	Fran Whelan
KK-C183-271	Yvonne Curran
KK-C183-271	Brigid Kiely
KK-C183-271	Timothy G McDonald
KK-C183-271	Gertrude McDonald
KK-C183-271	Pauline O Connell
KK-C183-271	Reuben Colman
KK-C183-271	Eamon Colman
KK-C183-271	Fan Comerford
KK-C183-271	Esther Doyle
KK-C183-271	Laura Kelly
KK-C183-271	Breda Comerford
KK-C183-271	Eugene O Sullivan
KK-C183-271	Jim Kiely
KK-C183-271	Niko Doyle
KK-C183-271	Karen Kealy
KK-C183-271	Sinead Butler
KK-C183-271	Dinnah O Shea
KK-C183-271	Eileen O Shea
KK-C183-271	William Butler
KK-C183-271	John O Shea
KK-C183-271	Ann Butler
KK-C183-271	Andrew Barron
KK-C183-271	Sean Walsh
KK-C183-271	Martin Butler
KK-C183-271	James Butler
KK-C183-271	Katherine Butler
KK-C183-271	Breda Butler
KK-C183-271	Tony Brennan
KK-C183-271	Edward Gormley
KK-C183-271	Margaret Hutchison
KK-C183-271	Kelley Hutchison
KK-C183-271	Ollie Hutchison
KK-C183-271	Tom Hutchison
KK-C183-271	Lisa Claesson
KK-C183-271	Andrew Nash
KK-C183-271	Patrick Foley
KK-C183-271	Majella Keane
KK-C183-271	Seamus Keane
KK-C183-271	Phil Brennan
KK-C183-271	E Griffith
KK-C183-271	Caroline Griffith
KK-C183-271	Trisha Gormley

Chief Executive's Report on submissions to the Draft Ministerial Direction

KK-C183-271	Mark Gormley
KK-C183-271	Tom Gormley
KK-C183-271	S Butler
KK-C183-271	Jim Butler
KK-C183-271	Martha Bolger
KK-C183-271	B Bergin
KK-C183-271	Martin Bergin
KK-C183-271	James Powell
KK-C183-271	Debbie Cantwell
KK-C183-271	Carl Giffney
KK-C183-271	Elaine Hanlon
KK-C183-271	Tom Brennan
KK-C183-271	Gillian Brennan
KK-C183-271	Isabelle Bergin
KK-C183-271	Eamon Bergin
KK-C183-271	Pauline Bergin
KK-C183-271	Matthew Bergin
KK-C183-271	James Bergin
KK-C183-271	Oliver Sutton
KK-C183-271	Damien O Reilly
KK-C183-271	Robert Duncan
KK-C183-271	Daniel McDaid
KK-C183-271	Conor Brett
KK-C183-271	Maura Brett
KK-C183-271	Lorraine Brett
KK-C183-271	Gavin Comerford
KK-C183-271	Jane
KK-C183-271	Chloe McDonald
KK-C183-271	Barry Colclough
KK-C183-271	Louise
KK-C183-271	Eamon Murphy
KK-C183-271	Dr Claire Cusack
KK-C183-271	Ann Colclough
KK-C183-271	George Clinton
KK-C183-271	Liam Meany
KK-C183-271	Alex McDonald
KK-C183-271	Luke McDonald
KK-C183-271	Bridget Coady
KK-C183-271	Margaret O Brien
KK-C183-271	Anthony Coady
KK-C183-271	Simon Bourke
KK-C183-271	Angela Malone
KK-C183-271	Joey Shore
KK-C183-271	Jackie Cullen
KK-C183-271	Laura Wemyss
KK-C183-271	Gina Quinlan
KK-C183-271	Alan Brennan

KK-C183-271	Desmond Barry
KK-C183-271	Enya Kennedy
KK-C183-271	James Langton
KK-C183-271	Shiela Keane
KK-C183-271	Anthony Morrissey
KK-C183-271	Conor Holohan
KK-C183-271	Jenny Kane
KK-C183-271	Jean Brett
KK-C183-271	Fiona Donnelly
KK-C183-271	Dean Lannon
KK-C183-271	Eamon Hayes
KK-C183-271	Paul Cleere
KK-C183-271	Pauline Cummins
KK-C183-271	Angela Walsh
KK-C183-271	Robert Hayes
KK-C183-271	Adrian O Niell
KK-C183-271	Eilish Kavanagh
KK-C183-271	John Glennon
KK-C183-271	Noel Brett
KK-C183-271	Gerard Campion
KK-C183-271	Thomas Brennan
KK-C183-271	Cuan Dignan
KK-C183-271	Ted Petrie
KK-C183-271	Greg Good
KK-C183-271	Chara McDonald
KK-C183-271	April O Brien
KK-C183-271	Harry Reid
KK-C183-271	Paul Moore
KK-C183-271	Olivia Hutchison
KK-C183-271	Jan Murphy
KK-C183-271	Denise Delaney
KK-C183-271	Pauline Cass
KK-C183-271	Sinead Butler
KK-C183-271	Grainne Gaffney
KK-C183-271	Justin Duggan
KK-C183-271	Andy Cunningham
KK-C183-271	Sharon Phelan
KK-C183-271	Kevin O Brien
KK-C183-271	Sue Anne Brett
KK-C183-271	Paul Wall
KK-C183-271	Robert Grimley
KK-C183-271	Mary Manning
KK-C183-271	Anthony O Brien
KK-C183-271	James Cloney
KK-C183-271	Michael Walsh
KK-C183-271	Darren Whelan
KK-C183-271	Therese Drummond

Chief Executive's Report on submissions to the Draft Ministerial Direction

KK-C183-271	Sturt Watkin
KK-C183-271	Eoin McMullan
KK-C183-271	Harry Watkin
KK-C183-271	Joan Brennan
KK-C183-271	Pat Delaney
KK-C183-271	Harry Watkin
KK-C183-271	Roisin Kelly
KK-C183-271	Mark Watkin
KK-C183-271	Pauric Curran
KK-C183-271	Niko Doyle
KK-C183-271	Miriam Copeland
KK-C183-271	Sophie Gaspard
KK-C183-271	Celine Dignan
KK-C183-271	Kieran White
KK-C183-271	Marie Kelly
KK-C183-271	Aoife Tyrell
KK-C183-271	John Quinn
KK-C183-271	Caroline Cahill
KK-C183-271	Andrew Keating Eustace
KK-C183-271	Mairead Buckley
KK-C183-271	Teige Powell
KK-C183-271	Helen Colclough
KK-C183-271	Gerry Byrne
KK-C183-271	Esther Lennon
KK-C183-271	Pat Galvin
KK-C183-271	Yvonne Moseley
KK-C183-271	Martin Matthews
KK-C183-271	Ciara Maher
KK-C183-271	Niall Dignan
KK-C183-271	Bob Murphy
KK-C183-271	Stephen Keogh
KK-C183-271	Eric Dignan
KK-C183-271	Ray Brophy
KK-C183-271	Michael O Farrell
KK-C183-271	Linda Dempsey
KK-C183-271	Bernard Dempsey
KK-C183-271	Samantha Keogh
KK-C183-271	Kieran Brett
KK-C183-271	Kid Keogh
KK-C183-271	Linda Phelan
KK-C183-271	Robert Duggan
KK-C183-271	Anne Marie Watkin
KK-C183-271	Victoria Muldowney
KK-C183-271	Jean Williams
KK-C183-271	Pat Comerford
KK-C183-271	Alex McDonald
KK-C183-271	Ian McDonald

KK-C183-271	Shane O Regan
KK-C183-271	Fiona O Niell
KK-C183-271	Bob Murphy
KK-C183-271	Geoff Deane
KK-C183-271	Cillian Coakley
KK-C183-271	Margaret McDonald
KK-C183-271	Paula Kelly
KK-C183-271	Damien Brett
KK-C183-271	Michael Boyd
KK-C183-271	Riann Dignan
KK-C183-271	Seamus Doyle
KK-C183-271	Goretti O Regan
KK-C183-271	Anne Watkin
KK-C183-271	Conor Harrington
KK-C183-271	Sean McMullan
KK-C183-271	Lillian Holohan
KK-C183-271	Yvonne Dowling
KK-C183-271	Noel Corr
KK-C183-271	Mark Collins
KK-C183-271	Greg Watkin
KK-C183-271	Angela Crowson
KK-C183-271	Patrick O Flynn
KK-C183-271	Eric Dignan
KK-C183-271	Kieran O Regan
KK-C183-271	Ray Cantwell
KK-C183-271	Kate Doyle
KK-C183-271	Clodagh