An Bord Pleanála

Inspector's Report

ABP-321238-24

Development	110kV Electricity Substation, approximately 7.5km of Underground Electricity Line & All Associated Works.
Location	Located at Moyvannan, Feamore, Lisbaun, Carrownolan, Carrowncloghan, Carrowkeeny, Ardmullan, Curraghboy, Gortnasythe, Derryglad, Eskerbaun & Brideswell, Co. Roscommon. (https://moyvannansubstation.ie)
Planning Authority	Roscommon County Council
Applicant(s)	Energia Renewables ROI Limited.
Type of Application	Application under provisions of Section 182A of the Planning and Development Act, 2000 (as amended)
Submissions	Transport Infrastructure Ireland Department of Housing Local Government and Heritage Rose Burke Ciara Farrell & the Wind Turbine Action Group South Roscommon

	Shane and Orla Kinahan
	Anne and PJ Daly
	Margaret Daly
	Maureen Kelly
	John Joe Kennedy
	Eileen Kelly
	Gerard and Angela Lennon
	Shane Butler
	Ulick Burke
	Marty and Mary Moore
	Skeavalley Wind Turbine Action Group C/O Orla Glennon
	Gearoid and Grainne Cunniffe/Ni Mheachair
	Dermot Butler
	Christopher Walsh and Mairead Farrell
	Liam Kildea
Date of Site Inspection	07/02/2025.
Inspector	Hugh O'Neill

Contents

1.0 Introduction

This case concerns an application for strategic infrastructure under section 182A of the Planning and Development Act, 2000, as amended. It is made on foot of pre-application discussions with the Board under ABP-319042-24 for a 110kV 'loop-in loop-out' electricity substation and approximately 6.5km of underground electricity, where the Board decided that the development would fall within the scope of section 182A of the Act and would be strategic infrastructure.

The purpose of the cable and substation is to connect Seven Hills Windfarm (consented development of 17 no. wind turbines ABP-313750-22) to the transmission network.

2.0 Site Location and Development Description

2.1. Site location

The project is located in rural County Roscommon approximately 9 km due northwest of the M6 bridge over the Shannon in Athlone, approximately 2.5km due west of lough Ree, 2.7km east southeast of Lough Funshinagh and immediately north/northeast of the village of Brideswell.

2.2. Site description

The application boundary encompasses an area for a substation and access thereto which consists of free draining agricultural soil in use for grazing sheep. The landscape in the immediate vicinity is undulating with turloughs at circa 200m to the south of the substation site.

There is a farmyard complex to the east of the site consisting of slatted sheds stocked with cattle at the time of inspection. The Athlone to Lanesboro 110kV Circuit Overhead Line passes to the north of the substation site on timber pole sets.

The site and surrounding area is set out in large fields defined by dry stone walls subdivided into paddocks by post and wire fencing. A low density single hedgerow forms the Western boundary of the proposed substation site.

There are recently constructed houses to the east and south of the substation at circa 500m and 300m respectively. There is a small farmyard immediately off the local road 50m to the south of the proposed substation site entrance.

Other than within the substation compound and access track the cable route (c.7.5km), and application boundary falls entirely within the carriageway of local roads L7551, L7556, L2018, L7731, L2023, and L7636 and for c. 350m within regional road R362.

The cable route is proposed to connect the existing permitted cable in the village of Bridewell to the southwest to the proposed substation to the northeast. Roadside boundaries, punctuated by regular domestic and agricultural accesses consist of stone walls, hedgerow, associated verge vegetation and other domestic and agricultural boundaries of typical construction.

3.0 Proposed Development

The planning application seeks a 10-year approval for:

1. A 110 kilovolt (kV) 'loop-in/loop-out' Air-Insulated Switchgear (AIS) electricity substation. The Substation includes a single-storey control building (with a Gross Floor Area of 450 m2 and ridge height of 9m over FFL of 72.65m); busbars, insulators, cable sealing ends, and lightning poles at a height of c.17m above a proposed ground level of 72.5m, within a secure compound (with a total footprint of approximately 8,500 m2) surrounded by a 2.6m security fence.

2. Replacement of 1 no. existing 14m high wooden pole-set at a surveyed ground level of c.76.76m with 2 no. lattice-type interface masts, each of which is described as being between 15 and 18 metres in height, to connect to the 110kV overhead line.

3. Approximately 270 metres of 110kV underground electricity line between the electricity substation and the interface masts below an access track to be constructed with an unbound surface and associated drainage within the agricultural field.

4. Approximately 630 metres of track, within the agricultural field finished with a permeable surface accommodating the cable below with associated drainage is

proposed to access the substation from the public road which includes an upgrade of the existing agricultural entrance.

5. Approximately 7.5 kilometres of 110kV underground electricity line in public road between the substation and the junction of the L7636 local road and R363 regional road, at which point the proposed cable connects to the electricity cables permitted as part of the Seven Hills Wind Farm (An Bord Pleanála Reference ABP-313750-22). Trenching of 1.3 deep and 0.6m wide is required for the cable duct installation. With HDD proposed for the single river crossing. Cable Joint bays (estimated 11 no.) with plan dimensions of 6m by 2.5m and communication chambers are required at intervals to be determined along the cable route. Full carriageway surface reinstatement is proposed post construction.
6. A temporary construction compound, temporary security compound, soil deposition areas and landscaping works are proposed adjacent to and in the same field as the substation compound
7. The estimated 14,010 m3 of excavated material arising from the substation is proposed to be utilised within the site including a portion within deposition areas. Of the estimated 11,240m3 arising from the underground line 10,550 m3 is to be disposed of off site
8. Construction is proposed to be undertaken in tandem with the Seven Hills Windfarm and is proposed to last approximately 15-18 months.

The application documentation includes the following:

- Natura impact statement. (NIS)
- Planning Application Drawings
- Site boundary .dwg.
- Environmental Impact Assessment Report, consisting of;
    1. Volume I – Assessment of Proposed Development;
    2. Volume II – Technical Annexes in support of Volume I;

The Non-Technical Summary is presented as a standalone volume.

The detailed list of contents of the EIAR is set out in the EIA section 10.1.1 of this report.

The applicant has created a standalone website for the development, http://www.moyvannansubstation.ie/. In addition to the website, the application includes details of site and newspaper notices, and public consultation by way of door-to-door visits, and a public information event.

4.0 Consultations

4.1. Planning Authority

The Planning Authority have submitted a report which concludes by stating the support of the Council for the principle of the proposal. The submission states satisfaction that the likely adverse environmental effects have been identified and can be managed and mitigated. However, the submission raises concerns regarding impacts on the local road network.

The submission states that the subject site is not zoned, land is located in the 'Lough Funshinagh, Stone Wall Grasslands and Esker Ridges' landscape character area which it states is classified as 'Moderate Value' in the Roscommon County Development Plan 2022 – 2028. The submission also provides an extensive CDP policy review pertaining to the proposal.

The submission highlights the importance of the measures of the CEMP and in particular the appointment of an Ecological Clerk of Works.

The submission concludes with a request that the assessment by the Board give due consideration to the impact on the local roads as set out in a report from the Roads Department. Concerns set out therein include:

- Lack of detail in the proposal,
- Nonadherence to advice given at pre-planning to locate cables in the road verge,
- Constraints and liabilities on RCC as the roads authority with responsibility for the subject roads.

- Increased costs on RCC for road maintenance and repair over time.

Roscommon County Council Roads Department report as appended to the submission sets out a number of standards to be adhered to and points to be agreed, with regard to opening, back filling and reinstatement of wearing course.

4.2. **Prescribed bodies**

Details of the application to the Board were circulated to the following prescribed bodies as advised at pre-planning stage:

- An Taisce
- Department of Agriculture, Food and the Marine
- Department of Defence
- Department of Environment, Climate and Communications
- Department of Housing, Local Government and Heritage (c/o Development Applications Unit)
- Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media
- Environmental Protection Agency
- Fáilte Ireland
- Inland Fisheries Ireland
- Irish Aviation Authority
- Office of Public Works
- Roscommon County Council
- The Arts Council
- The Heritage Council
- Transport Infrastructure Ireland
- Uisce Éireann

Submissions received by An Bord Pleanála from prescribed bodies are summarised as follows:

4.2.1. **Department of Housing Local Government and Heritage**

The Department report highlights concern regarding:

- Potential for the flight lines of Whooper Swan to transect/intersect with the proposed substation and/or areas of construction.

- Low number of dawn/dusk winter bird surveys to establish whooper swan flight paths.
- The potential for discovery of previously unknown archaeology highlighted in chapter 10 of the EIAR is noted.
- Having reviewed Chapter 10 of the EIAR The Department propose a condition to be attached to any consent granted.

4.2.2. **Transport Infrastructure Ireland (TII)**

TII note the absence of impact on the National Road Network.

4.3. **Public Submissions**

A total of 17 public submissions were received within the statutory period a number of which sought an Oral Hearing. Issues and concerns raised are summarised as follows:

General:

- Chronology, procedural and technical aspects of the planning and legal history of the wider Seven Hills windfarm development are set out with the implication that the applicant had knowledge of issues with the consented connection earlier than described in the current application.
- Level of public participation limited. Validity of the application questioned by virtue of notices, inspection thereof, inconsistency with ABP advice at pre-planning, and the absence of consent from ESB to access overhead line.
- Roscommon County Council (RCC), ABP inspector and the Board did not understand the proposal for joint bays for the cable route and implications of their construction in the Seven Hills windfarm assessment and considers joint bays to be important in assessing in combination effects in the AA of the subject proposal.
- Concerns regarding both the practicality and consequences of the HDD below the Cross Drain where it is traversed by the L2023, the structural integrity of the bridge parapet are questioned.

- The granting of the Seven Hills windfarm by the Board is evidence of the lack of regard for relevant issues.
- The application is not by way of 146B which may present procedural challenges.
- The need for the development has not been established as the previously permitted connection is retained.
- Applying for a second connection by S182A and amending the previous approval by 146B could be seen as a deliberate circumvention of a finding that the changing of the grid connection constitutes a material alteration.
- Approval of the subject development under Section 182A, could prejudice any future consideration of The Board of an application under Section146B to amend Seven Hills. The submission considers that this scenario would render any decision arising ultra vires.
- Inadequate justification for the extension of the appropriate period to 10 years.
- A number of submissions present case law and schedules of document references setting out wider (non-project specific) concerns regarding decisions of the Board.
- Property devaluation.
- Visual Impact.

Roads and Transportation

- The application boundary exceeds the width of the road in a number of locations.
- Road verges insufficient to accommodate cables.
- Disruption of vulnerable road users, businesses. Emergency services access of concern.

Geology, hydrogeology, hydrology flooding

- Insufficient detail has been provided with regard to surface water bodies including the Cross River.

- Potential hydrogeological interconnectivity in the location of proposed works along the L2017 to Lough Funshinagh.
- Risk of destabilising ground.

EIA/AA/Biodiversity/WFD

- Baseline hydrogeology and implications for AA as well as the technical expertise of the inspectorate and Board in these matters are of concern.
- Inconsistency in layout of subject EIAR and Seven Hills EIAR limits public engagement.
- EIAR chapter 7 (water) is fundamentally flawed and is invalid.
- Objectives of WFD of concern.
- Concerns regarding the potential for cable trenching to unknown dolines which are the start of the turloughs and as such are protected.
- Narrative in Chapters 6 and 7 of the EIAR do not accurately reflect the findings in Annex 6.1 (geophysical investigation) and 6.2 (Ground Investigation).
- A small section of a 2016 specialist hydrology report for ABP for ABP-244346 and 244347 (Seven Hills Windfarm) which reflects on the use of a standard of 'absence of scientific doubt' with respect to karst hydrogeology is presented, the submission then seeks to highlight a view of what can be proven with respect to the hydrogeological impacts of the proposal.
- Project splitting, having regard to its relationship to the Seven Hills windfarm.
- In response to a scoping request the DAU response to the applicant states that the proposal was impermissible project splitting.
- Alleged non-compliance with the EPA Guidelines on information to be contained in Environmental Impact Assessment reports with particular reference to an annex of the scoping report.
- Area potentially affected contains Annex I habitats as part of an interconnected network.

- Cumulative effects with the receiving waters from Lough Funshinagh temporary piping.
- The environmental baseline for the EIAR is out of date.
- Insufficient reconciliation of the methodologies in the ornithological studies conducted for the proposal and Seven Hills Wind Farm.
- Concern for the consideration given to the conservation objectives and cumulative impacts thereon to Whooper Swan, Lapwing and Blackheaded gull in the subject application.
- Insufficient baseline data has been presented for and consideration of cumulative impact on mammals with particular reference to Badgers, and Otters at water course crossings.
- Existing and future flood impacts arising from the proposal on roads, agriculture and septic tanks. The design and maintenance of flood mitigation measures are highlighted.
- Concerns regarding health impacts of electromagnetic fields (EMF) on general health and specific conditions generated by the substation.
- Impacts of noise from the substation on Humans and wildlife.
- Increased traffic and road safety concerns including for cyclists, pedestrians and runners. Lack of comprehensive traffic management plan and impact on businesses and schools in culmination with other developments.
- specific concerns regarding impacts on swans Egyptian Vulture and egrets.
- Impacts on ecology of the area. Impacts of cables on Curlew and Hen Harriers.

5.0 Applicant response to submissions

5.1. Applicant's response to Roscommon County Council submission

- Applicant unaware of any proposals for construction of other services within the subject roadways.

- Required separation distances are achievable. The proposal will not preclude future development along the proposed route.
- Joint bays will, insofar as possible, be located within the roadside verge or at agricultural access points to minimise their impact on the public road carriageway.
- Where the cable route must be altered in the future, provision for same could be agreed between the Planning Authority and the operator in charge of the electricity line at that time.
- Due to the absence or restricted availability of roadside verge, it will not be possible to maintain the separation distance of 1.2m from the road edge to the underground electricity line. There is no evidence base for the requested separation distance.
- The proposed development can be fully constructed within the planning application boundary.
- Full road width reinstatement of all public roads within which the underground electricity line is installed is proposed.
- The annual payment of €2,000 per kilometre is entirely unwarranted and unreasonable.
- The applicant is committed to ongoing engagement with the Planning Authority as part of the post-consent detailed design process.
- In the event that the proposed development is required to be relocated in the future, the costs of same would be borne by the statutory undertaker in charge of the infrastructure at that time.
- Each of the requests of the Planning Authority will be adhered to in full. In particular:-

1) A Construction Management Plan shall be prepared and agreed in writing with the Planning Authority;

2) Details of the Project Supervisor for the Design Process (PSDP), Project Supervisor Construction Stage (PSCS) and involved contractors shall be provided to the Planning Authority;

3) All necessary insurances and performance bonds shall be put in place;

4) An engineer shall be appointed to manage consultations with the Planning Authority;

5) Consultation will be undertaken with An Garda Síochana, emergency services and public transport operators in the area; and,

6) A Community Liaison Officer will be appointed to coordinate consultation with *inter alia* the public, local residents, business owners, schools and elected officials.

The Applicant acknowledges the requests of the Planning Authority and confirms that:-

1) Details of cable installation will be provided to the Planning Authority prior to the commencement of construction. It should be noted that, as committed to above, the Planning Authority will be engaged continuously throughout the post-consent detailed design process;

2) Road closure licences will be applied for a minimum of 8-weeks prior to the closure period;

3) Requests for temporary road work speed limits will be submitted to the Planning Authority a minimum of 8-weeks in advance and all signage will be installed and maintained by the Applicant;

4) Diversionary routes shall be maintained by the Applicant;

5) Traffic Management Plans will be prepared and submitted to the Planning Authority;

6) A pre-condition survey of the route of the underground electricity line and adjoining private entrances and boundary structures shall be undertaken and a copy provided to the Planning Authority. Any damage arising, which is directly attributable to the proposed development, shall be put right to the satisfaction of the Planning Authority and/or private landowner, as applicable, and the cost of same shall be borne by the Applicant;

7) Where necessary, pre-construction structural surveys of adjoining properties shall be undertaken;

8) All works shall be undertaken in accordance with Transport Infrastructure Ireland's *Specification for Road Works* unless otherwise specified and agreed with the Planning Authority;

9) All public road reinstatement works will be undertaken in accordance with the *Guidelines for the Opening, Backfilling and Reinstatement of Trenches in Public Roads (April 2017)* and shall be completed to the satisfaction of the Planning Authority;

10) All public roads within which the underground electricity line is installed will be subject to a full-carriageway (i.e. full road width) reinstatement and all reinstatement proposals shall be agreed with the Planning Authority;

11) All ironworks, road marking and road studs shall be reinstated to their original condition;

12) As part of the detailed design process, full details will be provided relating to any interactions with existing services and watercourse crossings;

13) In the event that any existing drainage features are affected, proposals for the management of surface waters shall be agreed with the Planning Authority;

14) The Applicant is agreeable to the implementation of a 2-year defects liability period.

5.2. Prescribed bodies

5.2.1. Applicant's response to Department of Housing Local Government and Heritage submission.

Archaeological and cultural heritage

The Applicant would welcome a condition of consent reflecting the requests as set out in the observation and notes that:

1) All mitigation measures set out at Chapter 10 (Volume I) of the EIAR shall be implemented in full;

2) Section 10.6.1 of Chapter 10 (Volume I) of the EIAR provides for the monitoring, under licence, of excavation associated with the proposed development.

3) A Planning-Stage Construction Environmental Management Plan has been prepared, and the Applicant has committed to the preparation of a detailed plan prior to the commencement of development.

4) The archaeological monitoring results will be furnished to the Planning Authority and the Department of Housing, Local Government and Heritage.

Whooper Swan flight lines

- No new tall infrastructure is to be developed in a location where none was previously present. No material increase in the height of the Athlone-Lanesborough 110kV overhead electricity line is proposed. Therefore, no cumulative effect on Whooper Swan flight paths or increase in collision risk arises as a consequence of the proposed development.
- Carrying out of a significant volume of dawn/dusk surveys was not assessed as being required.

5.2.2. Applicant's response to Transport Infrastructure Ireland (TII) submission

No works to the national road network are proposed.

5.3. Applicant's response to Public submissions

General

- A 10-year planning consent has been applied for to ensure that all necessary consents and licences can be obtained and implemented many of which can only be applied for following the granting of planning consent.
- The rationale for the approach to the proposed development is set out in detail at Section 1.0 of the Planning Statement.
- Engagement with EirGrid will ensure that all necessary supplementary licences and consents are in place.
- The proposed development is not likely to result in any adverse effect on property values.
- No significant effects arising from noise are assessed as likely.

- Decommissioning of the substation and line is not anticipated due their ongoing function as grid infrastructure.
- The information submitted with the planning application allows the public to understand the project and its impacts.
- The instructions of the Board at pre-planning stage have been complied with in full.

Roads and Transportation

- Over the course of an assumed 18-month construction phase average daily increase of 3 no. HGVs is forecast, this is assessed to be an imperceptible increase in traffic volumes.
- With implementation of traffic management measures the proposed development is not likely to result in significant congestion or delays or a significant risk of accidents.
- Any remedial works to roads shall be undertaken at the expense of the Applicant to the satisfaction of the Planning Authority.
- Construction and operational phase traffic will be strictly managed such that it will not pose a risk of likely significant effects on road and public safety.
- A Planning-Stage TMP has been prepared and submitted with the response to the submissions.
- Provision will be made in the TMP to maintain access for emergency services including prior notification of road closures and diversionary routes
- With the exception of 5 no. passing bays no substantial works are required to accommodate construction traffic.
- Potential impacts of the proposed development on transport, access and the road network have been assessed in full.
- Any works to carriageways which are identified as being required to accommodate the delivery of components or materials shall be undertaken.
- Full road closures will be implemented on a rolling basis; however the section of road to be closed at any given time is unlikely to exceed c. 100m. Given the

extensive road network in the local area, diversionary routes are readily available while specific arrangements; which will form part of a TMP to be agreed prior to the commencement of development; will be implemented to maintain access for residents, landowners and business operators.

- Joint bays have a width of 2.5m and not 4m as stated in a submission.

Geology, hydrogeology, hydrology, flooding

- The flood risk assessment has been conducted in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)
- Assessment of likely effects on the water environment (surface and ground water) adheres to all relevant best practice methodologies and guidelines and has been undertaken in the context of extensive fieldwork and site-specific geological, hydrological and hydrogeological data.
- The drainage system to be installed at the electricity substation will be subject to regular maintenance.
- Notable volumes of surface water runoff are not likely to arise as a consequence of the proposed development.
- No likely significant environmental effects have been assessed as likely as a result of the discharge of surface water runoff.
- There will be no discharge of excess water directly into any third party property.
- There is no significant likelihood of ground instability.
- The likelihood of significant cumulative effects on the hydrogeological environment have been fully assessed and significant effects are not likely to arise.
- In the event that any road proposed to be utilised for construction material deliveries is affected by flooding, or closed for any other reason, delivery vehicles will follow the diversionary route(s) implemented by the Planning Authority.

- The underground electricity line comprises of a 1.2m deep trench below an existing roadway and, based on these characteristics, it is assessed that there is a negligible likelihood of ground instability.
- No effects on groundwater are expected due to the shallow nature of the proposed works
- Significant effects on any eskers are not assessed as likely.
- There is no likelihood of significant effects on groundwater flows or on the risk of flooding.

EIA/AA/Biodiversity/WFD

- Cumulative effects of the proposed development and the permitted Seven Hills Wind Farm have been fully and comprehensively assessed throughout the EIAR and NIS.
- EMF at the proposed substation will be very substantially below the accepted limits. Given the separation distance between the electricity substation residences, significant effects are not assessed as likely.
- Significant residual effects are not likely to be experienced by any natural habitats or species
- Data recorded during site investigations is accurately set out at Chapter 6 (Volume I) of the EIAR and at Annexes 6.1 and 6.2 (Volume II).
- A suggestion that the proposed development represents project splitting has no basis.
- Residual effects during the construction phase (Section 12.2.6.1) are assessed to be slight-to-imperceptible negative and short-term; and significant effects are not assessed as likely.
- Most construction activities at the electricity substation, which have the potential for disturbing sensitive bird species, will be undertaken during the breeding season (April to August inclusive) to minimise disturbance to wildfowl and waders which use the turloughs to the south of the electricity substation site.

- The proposed development site is not located within or in the immediate environs of any proposed Natural Heritage Area (pNHA).
- The proposed development is not likely to have a significant adverse effect on any ecological receptors.
- The proposed development is fully compliant with the requirements of the Water Framework Directive and Environmental Objectives (Groundwater) Regulations 2010 (as amended).
- The EIAR includes a set of mitigation measures to ensure that likely significant effects on archaeological features are avoided.
- Full cumulative assessment of the likely significant noise and vibration effects is provided at Section 11.5.5 of Chapter 11 (Volume I) of the EIAR.
- A comprehensive cumulative assessment of the proposed development has been conducted; within both the EIAR and NIS; in combination with all relevant existing, permitted and proposed developments, including the permitted Seven Hills Wind Farm.
- The screening of Natura 2000 sites and the establishment, or otherwise, of ecological connectivity is described in the NIS.
- The proposed development is not likely to give rise to significant effects on any avian species, the conservation objectives regarding avian species will not be contravened.
- All surveys including mammalian were undertaken in accordance with best practice methods.
- Otter, as a qualifying interest of River Shannon Callows SAC, and as an Annex IV species, have been assessed in full in the NIS.
- A Planning stage Traffic Management Plan has been submitted as an annex and in response to concerns set out in a number of submissions.

6.0 Planning History

6.1. History of Seven Hills windfarm:

ABP 313750-22 Energia Renewables ROI Ltd applied to An Bord Pleanála for Strategic Infrastructure consent Section 37E for Construction of 20 x turbines including cable and connection to Monkland Substation Athlone and all associated works (Seven Hills Windfarm) at Cronin, Skyvalley and adjoining townlands, west of Athlone, Co. Roscommon. Consent was granted subject to 26 conditions on 23 November 2023.

ABP 307075-20 pre-planning consultation, Proposed wind farm consisting of 20 5-6 MW turbines, 110 kV substation associated works for (Seven hills Windfarm Development). On 30/06/2021 the Board confirmed that the proposed development would constitute strategic infrastructure.

ABP PL.20.239759 RCC 10/541 Galetech Energy Developments Limited 16 wind turbines with hub height of 85m and rotor diameter of 100m. overall height of 135m; all associated site development works at Cronin, Gortaphuill, Glenrevagh (ED Turrock), Mullaghardagh, Tullyneeny and Turrock Townlands,, Dysart,, Co. Roscommon. Granted by RCC subject to 33 conditions 4/10/2011, Third Party appeal, ABP Granted 09/09/2013 subject to 29 conditions. Decision Quashed 18/09/2014. Remitted to ABP ref: PL.20.244346 with significant further information the Board decided 28/02/2017 it was precluded from granting planning due to uncertainty, in relation to impact on the qualifying interests and consequently the integrity of the European Sites in the area.

ABP L.20.241069 RCC 11/273 Galetech Energy Developments Limited 19 no wind turbines each with a hub height of 85m and rotor diameter of 100m with an overall height of 135m at Boleyduff, Cam, Cloonacaltry, Cuilleenoolagh, Feacle, Milltown, Skeavally, Tawnagh and Tobermacloughlin, Co Roscommon Granted by RCC subject to 30 conditions 17/08/2012 third part appeal, granted subject to 25 conditions by ABP 13/09/2013 Decision Quashed 18/09/2014. Remitted to ABP under ref: PL.20.244347 with significant further information on 28/02/2017. The Borad decided it was precluded from granting planning due to uncertainty, in relation

to impact on the qualifying interests and consequently the integrity of the European Sites in the area.

6.2. History relating to substation and cable route

ABP-319042-24 Pre-Application Consultation Request 110kV 'loop-in loop-out' electricity substation and approximately 6.5km of underground electricity cables as alternative to Seven Hills permitted connection to Monksland substation. An Bord Pleanála Decided, Is a Strat. Infrast. Dev. signed 25/10/2024.

RCC 2560188 Decision due 22/06/2025 for retention of slatted shed containing cattle handling facilities, 2. Existing silage base, 3. Existing straw bedded shed. Planning Permission sought to construct new slatted shed. This yard is immediately adjacent to the proposed substation and within the substation and cable application landownership boundary.

RCC 2460559 Permission for works to uprate approximately 35.7km of the overall 35.82km of the existing Athlone to Lanesboro 110 kV overhead line (OHL) circuit to which the substation is proposed to connect. Permission granted 21/05/2025. The application notes the pole sets within the substation application boundary are 12 and 14 metres in height and are to be replaced with new pole sets of 16 meters. New pole sets are to be standardised ranging from 16m to 23m in height resulting in increases of between 0.1m to 4m across the 155 intermediate pole sets subject to the application.

Recently decided cases along the cable route:

Application Number	**Development Description**	**Development Address**	**Decision**
16331	demolition of an existing barn, relocation of existing carpark; the construction of 6 number houses	Brideswell Townland , Brideswell , Co. Roscommon	REFUSED
17164	to erect a memorial	Brideswell , Athlone , Roscommon	CONDITIONAL
17211	dwelling house, and septic tank	Pollalaher , Brideswell , Athlone	CONDITIONAL
18565	dwelling house,	Gortnasythe , Kiltoom , Athlone	CONDITIONAL
212	extension to dwelling house	Eskerbaun , Brideswell , Co Roscommon	CONDITIONAL

21268	dwelling house, septic tank	Moyvannion , Kiltoom , Athlone	CONDITIONAL
21465	dwelling house and proprietary treatment system	Eskerbane , Brideswell , Co.Rocommon	CONDITIONAL
2360162	conversion and **extension of school, pedestrian footpath**	Brideswell TD. , Brideswell Athlone , Co. Roscommon	CONDITIONAL
2460293	retain access track and hard standing Planning permission to erect a 24-metre-high lattice telecommunications support structure together with antennas, dishes and associated telecommunications equipment,	Carrowkeeny , Kiltoom , Co. Roscommon	CONDITIONAL

7.0 Legislative and Policy Context

7.1. European

EU, National and Regional policy with regard to renewable energy and infrastructure generally supports proposals for renewable energy including its connectivity to the national power grid.

EU Directive 2009/28/EC and Directive 2018/2001/EU (Renewable Energy) Promotes and sets out legally binding targets for renewable energy.

European 2020 Strategy for Growth, Sets out targets for renewables and greenhouse gas emissions.

EU 2030 Climate and Energy Framework A longer-term framework to cut greenhouse emissions and renewable energy.

EU Energy Roadmap 2050 sets out options to achieve above referenced goals.

REPowerEU Plan May 2022 phase out dependency on Russian energy as a matter of urgency.

7.2. National

Climate Action and Low Carbon Development Act 2015 as amended,

This Act sets out a roadmap for Ireland's transition towards a low carbon economy and details mechanisms for the implementation of the National Mitigation Plan (NMP), published in July 2017. The aim of these mechanisms is to lower Ireland's

level of greenhouse emissions. In addition, the Act requires a National (Climate Change) Adaptation Framework (NAF) to provide responses to changes caused by climate change.

National Mitigation Plan 2017 (updated January 2021)

Sets out a pathway to achieve deep decarbonisation in line with overall Government policy objectives and EU renewable Energy targets for 2030.

Ireland's Long-term Strategy on Greenhouse Gas Emissions Reductions 2024

The National long-term Climate Action Strategy, entitled Ireland's Long-term Strategy on Greenhouse Gas Emissions Reductions 2024, sets out indicative pathways, beyond 2030, towards achieving carbon neutrality for Ireland by 2050. The Strategy provides a pathway to a whole-of-society transformation and serves as a vital link between shorter-term Climate Action Plans and Carbon Budgets and the longer-term objective of the European Climate Law and Ireland's National Climate Objective.

The National Adaptation Framework; Planning for a Climate Resilient Ireland June 2024

The most recent approved national adaptation framework, the National Adaptation Framework; Planning for a Climate Resilient Ireland June 2024 (NAF) is Ireland's second statutory National Adaptation Framework (NAF) and was published on 5th of June 2024.

The NAF and its successors do not identify specific locations or propose adaptation measures or projects in individual sectors, but sets out the context to ensure local authorities, regions and key sectors can assess the key risks and vulnerabilities of climate change, implement climate resilience actions and ensure climate adaptation considerations are mainstreamed into all local, regional and national policy making.

The NAF identifies 13 (previously 12) priority sectors under 7 lead Departments that are required to prepare sectoral adaptation plans under the Climate Act in accordance with the Sectoral Planning Guidelines for Climate Change Adaptation which were published in 2018 and updated in 2024. The original 12 sectoral Plans prepared in 2019 and a new sectoral Plan for tourism are to be updated/prepared by end of Q3 2025.

National Energy & Climate Plan 2021-2030

Sets out a detailed statutory set of targets for achieving a 51% reduction in CO2 emissions with net zero at 2050.

Climate Action Plan 2025 (2024)

The Climate Action Plan 2025 states that an accelerated and increased deployment of new renewable electricity generation capacity and related infrastructure is required and sets out measures and actions that support its delivery.

CAP25 sets national targets for the proportion of renewable energy in the mix, 80% Renewable Electricity Share by 2030 – 9 GW onshore wind and 8 GW Solar PV aligned with the legally binding economy-wide carbon budgets and sectoral emissions ceilings that were agreed by Government in July 2022. The CAP theme titled Accelerate Renewable Energy Generation sets out measures and high level actions for delivery of CAP 25 which include the acceleration of generation and of flexibility. Both measures depend on the connection of renewables to and enhancement of the electricity grid. CAP25 contains reproduces a table from the NPF first revision which sets out that energised capacity for onshore wind in the northern and western region is provided at 1761MW in 2023 with an additional renewable power capacity allocation of 1389MW in pursuit of national targets.

National Development Plan 2021-2030

As part of Project Ireland 2040 sets out an overall investment strategy and budget for the period to 2030. Policy NSO 8 addresses the need for development to be climate neutral and the need to build a climate resilient society by way of a co-ordinated programme of investment in grid scale renewable energy with associated electricity transmission networks.

National Planning Framework (first review April 2025).

National Strategic Outcome NSO 8 seeks to drive a transition towards a low carbon and climate resilient society. This seeks to deliver goals set down within the National Mitigation Plan and National Adaptation Framework incorporating a more renewable energy focused approach. In addition to NPO 55, (grid connectivity enhancements), NPO 71 makes it an objective to upgrade the grid including supporting delivery of a renewable energy allocation of 17,61MW of onshore wind for the Northern and Western Region.

National Biodiversity Action Plan 2023-2030

The plan takes account of the wide range of policies, strategies, conventions, laws and targets at the global, EU and national level that influence our shared environment in order to scale up biodiversity action and aims to meet urgent conservation and restoration objectives across Ireland's terrestrial, marine, and freshwater ecosystems. Taking an 'all-of-government, all-of-society' approach 5 objectives are set out towards protecting and enhancing our biodiversity.

7.3. Regional

Northern and Western Regional Assembly's Regional Spatial and Economic Strategy (RSES) 2020- 2032

In the Economy and Employment Section (3) of the RSES, Regional Policy Objectives (RPO) 4.17 Encourages development of transmission and distribution grids to facilitate the development of renewable energy projects.

Section 8.2 of Chapter 8, Infrastructure addresses the Electrical Grid Network and sets out objectives including RPO 8.3 which supports linkages with renewable energy proposals to the electricity transmission grid.

7.4. Local

Roscommon County Development Plan 2022-2028

A Renewable Energy Strategy, Climate Adaptation Strategy and a Landscape Character Assessment support the County Development Plan.

Chapter 8 of the Development Plan deals with Climate Action, Energy and Environment, and contains relevant policy objectives including the following:

Renewable energy:

CAEE 8.3: seeks to support developments and actions that assist in achieving national targets for renewable energy and reducing greenhouse gas emissions.

CAEE 8.4: seeks to encourage & facilitate the various forms of renewable energy development detailed in the Renewable Energy Strategy (RES).

CAEE 8.5: seeks to facilitate wind energy developments primarily in areas designated as “Most Favoured” & secondarily in “Less Favoured” areas in the RES.

CAEE 8.7: seeks to ensure that renewable energy developments are considered in the context of relevant EU & national legislation (incl. environmental protection).

CAEE 8.8: seeks to ensure that renewable energy developments do not undermine the preservation & conservation of the natural & built environment.

CAEE 8.9: seeks to work in collaboration with EirGrid and other service providers and statutory bodies to facilitate a modern electricity network within the county.

Table 1.1 sets out Strategic Aims and Table 8.1 deals with Renewable Energy Potential in the county.

Strategic Aim SA1 seeks to achieve a transition to a competitive, greener, low carbon, climate resilient and environmentally sustainable county, …… by promoting and facilitating renewal energy initiatives on a domestic and commercial scale.

Chapter 9 deals with Built Heritage and Chapter 10 deals with Natural Heritage. Appendix 6 deals with Climate Action, Adaptation & Mitigation.

SA11: seeks to protect & enhance the natural assets of the County, including clean water, biodiversity, landscape, green infrastructure, heritage & agricultural land.

SA14: seeks to protect, conserve & enhance built & natural heritage & landscape.

Landscape:

NH 10.25: seeks to minimise visual impacts on areas including of high landscape value.

NH 10.26: seeks to protect important views & prospects in the rural landscape.

The location of the proposed substation falls within character area 7, mid lough Ree Pastureland which is classified as being of very high landscape value with the cable route falling under a classification of Moderate Value as presented in Figure 8, of the Landscape Character Assessment. There are no designated scenic routes or scenic views which could be impacted by the proposal.

Heritage:

BH 9.13: seeks to secure the preservation of artefacts (in situ or by record).

NH 10.1: seeks to ensure the protection, conservation & enhancement of biodiversity.

NH 10.7/8/9/10: seeks to protect European sites & NHAs.

8.0 Natural Heritage Designations

The site of the proposed development does not overlap with any natural heritage designations. The following are most proximate to the site with approximate distance indicated in brackets:

- Lough Croan SAC & SPA, pNHA (5.5km)
- Four Roads Turlough SAC & SPA, pNHA (10km)
- Lough Funshinagh SAC, pNHA (2km)
- River Suck Callows SPA, NHA (9km)
- Killeglan Grassland SAC (7.5km)
- Castlesampson Esker SAC, pNHA (4km)
- Ballynamona Bog/Corkip Lough SAC (1km)
- Middle Shannon Callows SPA (9km)
- River Shannon Callows SAC, pNHA (9km)
- Mongan Bog SPA (16km)
- Lough Ree SAC, SPA, pNHA (2km)
- Carrickynaghtan Bog NHA (10km)

2 unnamed and undesignated turloughs circa 300m to the south of the substation are noted in the application as being Priority 1 habitats.

9.0 Assessment

Having regard to the requirements of the Planning and Development Act, 2000, as amended, the assessment of the proposed development is divided into three parts to include the planning assessment (section 9) environmental impact assessment (section 10) and appropriate assessment (section 11). Invariably there is a significant

overlap in the assessments, and to avoid undue repetition where issues arise they are addressed in the environmental impact assessment (EIA) and appropriate assessment (AA) sections.

Planning Assessment

Having inspected the site and examined the application details and all other documentation on file, including all of the submissions received in relation to the application, I consider that the main issues in the planning assessment relate to the following matters:

- Procedural Matters
- Principle of the development
- Roads and transport
- Residential/Visual/Landscape impact
- Flood risk

It should be noted that many of the public submissions received raise concerns that relate to the Seven Hills Windfarm which benefits from an extant consent. This assessment addresses the proposed substation and cable route in combination with the permitted windfarm addressed where relevant.

9.1. Procedural Matters

The applicant has demonstrated sufficient legal title to undertake the proposed development.

The future use of S146B to amend the Seven Hills approval is a discrete and separate process to the subject matter and beyond the scope of this report. In the event of a future application being made pursuant to S146B, due consideration would be given to matters including EIA. I am content that no conflict arises in this regard.

I am satisfied that the need for the extended 10 year appropriate period has been established in principle by virtue of the complexities in implementing the subject proposal and associated permits that may be required and consents including the Seven Hills Windfarm which the proposal is an integral part.

Notwithstanding the request for development contribution scheme to be applied in the submission from Roscommon County Council, as this application has been made and is considered under S182A of the Planning and Development Act 2000 as amended, development contributions are not applicable in this case.

Possible/predicted design deviations which are considered to constitute points of detail and therefore within the scope of the consent sought include the following:

- Layout of Substation compound and internal control building therein to comply with eirgrid/prevailing standards
- Exact specification of substation components
- Final design of works to facilitate construction of the HDD at Cross river
- Final location of cable joint boxes

9.2. **Principle of the development**

The site consists of un-zoned agricultural land and public road on which the proposal is acceptable in principle.

National, regional, and local planning policy support the provision of electricity infrastructure. Objective CAEE 8.3 of the Roscommon County Development Plan 2022-2028 supports developments and actions supplying this energy via national grid.

The proposed development is for the purpose of connecting a consented windfarm to the national grid. The proposal contributes to future grid resilience and reinforcement in connecting the consented Seven Hills Windfarm and is consistent with delivery of the targets and policies in Climate Action Plan 2025 (CAP25) supported by Climate Action Plan 2024 (CAP24) providing capacity and resilience in accordance with the national long term climate action strategy.

A balance needs to be struck between the carbon emitting activities (incl. manufacture, transport and construction), the loss of any carbon storage capacity in excavated and/or drained soils, and the generation of renewable energy from non-carbon emitting sources.

The roadway in which the cable route is to be located passes through a relatively short area of peaty soils with only 145m^3 of peaty soils estimated to be excavated in total. No significant area of trees, wetlands or other significant carbon storage are to be impacted. The Seven Hills windfarm application anticipated a contribution of c.3,600MW of wind energy over 30-years with further use of the cable and substation expected beyond this likely. The embodied carbon associated with the construction and operation of the substation and cable connection will be offset when balanced against its function of delivering renewable energy, at scale to the national grid.

The need for the development in the absence of the previously permitted connection is clear. I conclude that the proposal should be viewed favourably subject to normal planning and environmental considerations.

I am satisfied that the principle of a 110kV substation and cable is in accordance with the overarching planning policy framework and for that reason is in accordance with the proper planning and sustainable development of the area and acceptable in principle.

9.3. **Roads and transport**

The proposed development has the potential to impact on the local road network during construction because of disruption and traffic management measures arising from excavation of the road for installation of cable ducting and joint bays. Taking account of the temporary nature of the disruption and the mitigation proposed I consider the traffic and transport impacts to be acceptable in the context of the proper planning and sustainable development of the area.

Notwithstanding the request by Roscommon County Council for a special contribution towards annual road maintenance and taking account of the application being made under S.182A I consider the defects liability period proposed to be appropriate and an adequate response to the concerns of the roads authority. I therefore am not recommending that The Board attach a condition in this regard as requested in the submission of Roscommon County Council.

Road and transportation are considered and addressed further in chapter 12 of the EIAR and assessment thereof within the EIA consideration at section 10.10 this report.

9.4. **Residential and Visual impact**

The potential for impacts arising from noise, dust, disturbance and landscape impact are addressed in the EIA below.

Whilst acknowledging the locally elevated siting of the substation has the effect of increasing potential for visual impact, the proposed siting of the substation has taken many factors into consideration. The wider topography and the immediate natural and built environment of the substation which include a substantial farmyard and the 110kv overhead power line to which it is proposed to connect create an assimilative capacity for the proposed development without significant negative impact on the landscape quality. I consider that the assessment of the impact presented in the application to be reasonable and accurate, and that the proposed development is acceptable in visual terms.

The proposed development would not overlook, overshadow, or result in a loss of privacy to any nearby houses.

Whilst acknowledging that there will be a construction phase impact on the amenity of residential property in the vicinity of the works, I am content that with consideration of noise thresholds and other proposed mitigation measures set out in the EIAR into account the loss of residential amenity will not be of a magnitude and duration such that it is incompatible with the proper planning and sustainable development of the area.

The applicant has stated the intention to construct the subject development in tandem with the Seven Hills Wind farm. The Seven Hills Windfarm consent restricts construction hours by condition to 08:00 to 16:00 Mondays to Saturdays. The subject application proposes working hours of 07:00 to 19:00 Monday to Friday and 7:00 to 13:00 Saturday. If the Board are minded to grant approval, in the interests of clarity and consistency, for the protection of residential amenity during the construction I recommend that the Board attach a specific condition restricting construction hours to 08:00 to 16:00 Mondays to Saturdays as drafted below.

9.5. **Flood risk assessment**

Concern has been raised in submissions regarding the potential for the proposal to result in and or exacerbate flooding in the area as summarised in section 4 of this report.

The submitted Flood Risk Assessment Annex 7.2 Volume II of the EIAR contains a site specific Flood risk Assessment and concludes that the substation is entirely located in Flood Zone C and therefore not subject to risk. The cable route passes through an area subject to risk (crossing of Cross River) but is not development vulnerable to flooding. The risk of the project contributing to downstream flooding is very low, as the plan for the site is to discharge water to ground as per the existing hydrological regime. I consider on the basis of the materials submitted including the surface water controls proposed that the development is not vulnerable to flood risk and that it will not impact on flood risk in the wider area.

10.0 **Environmental Impact Assessment**

10.1. **Introduction**

This section of the report deals with the potential environmental impacts of the proposed development during the construction and operational phases. Decommissioning is not proposed as the development is to form part of the national grid. This section should be read in conjunction with Section 9 (Planning Assessment) and Section 11 (Appropriate Assessment).

The proposal is an integral part of a large project as well as a potential change to a development already authorised but not executed and is treated as such for the purpose of this EIA.

In carrying out this EIA, I have examined the information presented by the applicant, including the EIAR, along with the submissions made by the planning authority, prescribed bodies and observers summarised in sections 4 and 5 of this report. I have also had regard to relevant legislation and guidance including, Guidelines on the information to be contained in Environmental Impact Assessment Reports (EPA 2022)

10.1.1. Compliance with the Requirements of Article 94 and Schedule 6 of the Regulations 2001

The applicant has submitted an Environmental Impact Assessment Report (EIAR) which is presented in a 'grouped format' whereby each environmental factor (topic) is assessed and presented as a separate chapter comprising the following:

Volume I

Chapter 1: Introduction.
Chapter 2: Assessment of Project Alternatives.
Chapter 3: Description of the Project.
Chapter 4: Population & Human Health.
Chapter 5: Biodiversity.
Chapter 6: Land & Soils.
Chapter 7: Water.
Chapter 8: Air Quality & Climate.
Chapter 9: Landscape.
Chapter 10: Cultural Heritage.
Chapter 11: Noise & Vibration.
Chapter 12: Material Assets.
Chapter 13: Interactions of the Foregoing.

Volume II

Annex 1.1 Environmental impact assessment scoping report.
Annex 1.2 Record of meeting.
Annex 1.3 Strategic infrastructure development determination.
Annex 1.4 Scoping request letter.
Annex 1.5 Scoping responses.
Annex. 1.6 Community consultation report.
Annex. 1.7 Schedule of mitigation measures.
Annex 2.1 Alternative substation locations.
Annex 2.2 Alternative electricity substation designs.
Annex 2.3 Alternative underground electricity line routes.
Annex 2.4 Alternative construction material delivery routes.
Annex 3.1 Site location plan.
Annex 3.2 Electricity substation site layout.
Annex 3.3 Control building plans and elevations.

Annex 3.4 Planning stage construction and environmental management plan.
Annex 5.1 Figures.
Annex 5.2 Bird survey report.
Annex 5.3 Aquatic survey Report.
Annex 5.4 Desktop survey Data.
Annex 5.5 County development plan extract.
Annex 5.6 Site synopsis.
Annex 6.1 Geophysical investigation report.
Annex 6.2 Ground investigation report.
Annex 6.3 Figures.
Annex 7.1 Figures.
Annex 7.2 Flood risk assessment.
Annex 7.3 Laboratory reports.
Annex 7.4 Water framework directive assessment.
Annex 8.1 Planning stage dust minimisation plan.
Annex 9.1 Zone of theoretical visibility map.
Annex 9.2 Photomontages.
Annex 9.3 Landscape and ecological mitigation plan.
Annex 11.1 Glossary of acoustic terms.
Annex 11.2 Noise metre calibration certificates.
Annex 12.1 Air Corp wind farm and tall structures position paper.
Non-Technical Summary is presented as a standalone volume.

Article 94 (a) Information to be contained in an EIAR (Schedule 6, paragraph 1)
A description of the proposed development comprising information on the site, design, size and other relevant features of the proposed development (including the additional information referred to under article 94(b).
A description of the proposed development is contained in Chapter 3 of the EIAR including details on the location, site, design and size of the development, arrangements for access and construction methodology, off-site/secondary developments; description of materials, plant and equipment used to facilitate construction together with a description of potential emissions; waste, traffic and project duration.

In each technical chapter the EIAR details are provided on use of natural resources and the production of emissions and/or waste (where relevant). It is noted that the proposal does not involve demolition works beyond the excavation for trenching of roads.
A description of the likely significant effects on the environment of the proposed development (including the additional information referred to under section 94(b).
An assessment of the likely significant direct, indirect, and cumulative effects of the development is carried out for each of the technical chapters of the EIAR. I am satisfied that the assessment of significant effects is adequate to draw robust conclusions.
A description of the features, if any, of the proposed development and the measures, if any, envisaged to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment of the development (including the additional information referred to under section 94(b).
The EIAR includes designed in mitigation measures and measures to address potential adverse effects identified in technical studies. These, and arrangements for monitoring, are set out in individual chapters and are summarised in **Annex 1.7**, **Volume II** (Schedule of Mitigation Measures), and Annex 3.4 Planning-Stage Construction & Environmental Management Plan. Mitigation measures comprise standard good practices and site-specific measures and are largely capable of offsetting significant adverse effects identified in the EIAR.
A description of the reasonable alternatives studied by the person or persons who prepared the EIAR, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the proposed development on the environment (including the additional information referred to under Article 94(b).
A description of the alternatives considered is contained in Chapter 2 of the EIAR. The alternatives considered include, do nothing', strategic site selection, alternative substation locations and designs, alternative layout and design, and alternative electricity line route options.

Electricity line route options G1 and G2 are explored in detail, route option G3 appears to have been introduced at a late stage and was selected as the preferred option. The main reasons for opting for the current proposed substation location and cable route were based on minimising environmental effects. Notwithstanding the apparent late consideration of cable route option G3 I am satisfied, that the applicant has studied reasonable alternatives in assessing the proposed development and has outlined the main reasons for opting for the current proposal before the Board and in doing so the applicant has taken into account the potential impacts on the environment.
Article 94(b) Additional information, relevant to the specific characteristics of the development and to the environmental features likely to be affected (Schedule 6, Paragraph 2).
A description of the baseline environment and likely evolution in the absence of the development.
A description of the baseline environment and an assessment of the likely evolution thereof in the absence of the development is included in each technical chapter of the EIAR. NPWS have expressed concern regarding the timing of bird survey work. However I consider the baseline presented to be adequate for the purpose of the subject EIA.
A description of the forecasting methods or evidence used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information, and the main uncertainties involved
The applicant has indicated in the different chapters of EIAR where difficulties have been encountered (technical or otherwise) in compiling the information to carry out EIA. The extent and therefore consequence of difficulties encountered are addressed as necessary in the assessment where they arise. I am satisfied that forecasting methods are adequate in respect of likely effects.

A description of the expected significant adverse effects on the environment of the proposed development deriving from its vulnerability to risks of major accidents and/or disasters which are relevant to it.
This issue is specifically dealt with in Chapter 4 Population and Human Health of the EIAR. Specific risks have been identified in relation to the project's vulnerability to flooding and fire. These risks are adequately set out and are assessed in my report.
Article 94 (c) A summary of the information in non-technical language.
This information has been submitted as a separate standalone document. I have read this document, and I am satisfied that the document is concise and comprehensive and is written in a language that is easily understood by a lay member of the public.
Article 94 (d) Sources used for the description and the assessments used in the report
The sources used to inform the description, and the assessment of the potential environmental impact are set out in each chapter. Notwithstanding concerns set out in a number of submissions I consider the sources relied upon are generally appropriate and sufficient.
Article 94 (e) A list of the experts who contributed to the preparation of the report
A list of the various experts who contributed to the report are set out in Table 1.2 in Chapter 1 of the Report. Where relevant the introductory section of each of the chapters also details of the individual's expertise, qualifications which demonstrates the competence of the person in preparation of the individual chapters within the EIAR. I am satisfied that the EIAR has been prepared by experts with competency in the technical subject areas.

10.1.2. **Consultations**

Issues raised in respect of consultations are summarised in section 4 above and in at the outset of the assessment of each chapter below. Issues raised therein are taken into account throughout this report including in undertaking the EIA, in advance of decision making.

Although adequacy is contested by a number of objectors, the applicant has carried out consultation including in the scoping the EIAR. In addition to correspondence with prescribed and other relevant parties, the site and newspaper notices, and the provision of a development website, the applicant provides the following detail at section 1.10.2 of the EIAR.

> *In June 2024, door-to-door visits were undertaken with local residents together with leaflet drops. In addition, a public information event was held on 19 June 2024 at the St. Brigid's GAA Club, Kiltoom, Co. Roscommon where members of the public and community groups were afforded the opportunity to discuss the project directly with the project team.*
>
> *A full report on the public consultation process undertaken by the Developer is presented at* ***Annex 1.6*** *(****Volume II****).*

Submissions have been received from statutory bodies and the public as set out in section 4 above.

I am satisfied that the application has been submitted in accordance with the requirements of the Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001 (as amended) in respect of public notices. I am satisfied, therefore, that appropriate consultations have been carried out and that there has been ample opportunity to comment on the proposed development in advance of decision making.

10.1.3. Article 94 Compliance

Having regard to the foregoing, I am satisfied that the information contained in the EIAR, and supplementary information provided by the developer is sufficient to comply with article 94 of the Planning and Development Regulations, 2001.

10.1.4. Assessment of Likely Significant Effects

This section of the report sets out an assessment of the likely environmental effects of the proposed development including those, as set out Section 171A of the Planning and Development Act 2000, as amended:

- Population and human health,

- Biodiversity, with particular attention to species and habitats protected under the Habitats Directive and the Birds Directive,
- Land, soil, water, air and climate,
- Material assets, cultural heritage and the landscape,
- Interaction between the above factors, and
- The vulnerability of the proposed development to risks of major accidents and/or disasters.

10.2. Population and Human Health - Chapter 4

10.2.1. Issues raised in submissions.

Health impacts of electromagnetic fields.

Altered flooding regimes could impact on farm incomes.

Noise from substation impacts on human health.

10.2.2. Examination of EIAR

1. Context

Chapter 4 addresses the topic of Population and Human Health. The approach to this chapter accords with Environmental Protection Agency (EPA) Advice Notes on Current Practice in the preparation of Environmental Impact Statements (2003), in selection of issue specifically examined in this chapter.

The chapter refers to an ESB document '*EMF & You*' (ESB, 2017).

In respect of human health, the chapter takes into consideration the results of other assessments in the EIAR which have relevance to health, namely soils; water; air quality; noise; and landscape.

2. Baseline

EIAR baseline contains a brief summary of key socio-economic baseline data relating to the wider study area, baseline for associated topics including water, air, noise and landscape are set out in their respective chapters.

3. Potential effects

Project Phase	Potential Direct, Indirect and Cumulative Effects
Do Nothing	• Seven Hills windfarm not connected to grid.
Construction	• Commercial and employment opportunities • Effect on local population as a result of construction related disruption with particular reference to the cable route
Operation	• None
Decommissioning	• The project will form part of the national electricity network and decommissioning of the project is not proposed. Therefore, decommissioning phase effects will not occur
Cumulative	• None

4. Mitigation

Designed in water protection, noise and dust minimisation measures will ensure that significant population or human health effects are unlikely to occur.

5. Residual effects

The submitted assessment concludes that the project will have no likely significant adverse effects on population and human health Therefore no specific mitigation measures, other than full adherence to all health and safety and public health guidance, have therefore been identified as being required.

10.2.3. **Analysis, Evaluation and Assessment: Direct and Indirect Effects**

I have examined, Chapter 4 of the EIAR which includes consideration of Population, Labour Market/Education and Skills, Business Diversity and Supply Chain, Visitor Economy, in the wider study area and community recreation, visitor economy assets and land use in the local study area.

I have analysed and evaluated the direct and indirect effects on population and human health in the wider and Local study areas as presented in this chapter.

I have assessed that the impacts on employment and local investment, tourism economy, population sustainability and residential amenity, general amenity and wellbeing, land use and tourism, recreation assets and major accidents or natural disasters at construction and operational phases as presented in the chapter are not likely to be significant.

Whilst acknowledging the potential for cumulative effects with the Seven Hills Windfarm in the wider study area during the construction phase such as trenching of roads, these effects are of a temporary and transient nature and with mitigation by the construction practices described in the proposal are not considered to be significant.

Concerns expressed in submissions regarding the magnitude of, and sensitivity to Electromagnetic Fields arising from the proposed infrastructure are specifically addressed in section 4.5.2.2, of the EIAR and are determined therein to be imperceptible at residential dwellings. ESB guidance and exposure thresholds with reference to WHO and EU guidelines are referenced in the consideration of the issue in this chapter.

The risk of flooding, noise and dust arising from the proposal resulting in effects on Population and Human Health is determined to be negligible. Further consideration is given to these topics under relevant chapter headings in this report.

I am satisfied that the applicant understanding of the baseline environment, by way of desk and site surveys, is comprehensive and that the key impacts in respect of likely effects on Population and Human Health, as a consequence of the development have been identified.

10.2.4. **Conclusion: Direct and Indirect Effects**

I have examined Chapter 4 of the EIAR which deals with Population and Human Health. Having regard to the survey work carried out, the location of the site and existing environment I am satisfied that there is no potential for any significant direct, indirect or cumulative effects on Population and Human Health as a result of the proposed development.

10.3. **Biodiversity - Chapter 5**

10.3.1. **Issues raised**

Department of Housing Local Government and Heritage (the Department) have set out concerns that the location of the substation site relative to the Lough Ree SPA and the Shannon callows SPA could intersect/transect potential flight paths and that

survey times for Whooper Swans prevent an assessment of a potential effect. Further data is recommended by the Department in order to address concerns.

Submissions allege a deficiency arising from inconsistency in presentation of ornithological survey between the current proposal and the Seven Hills Windfarm EIAR.

Impacts on swans and other birds using the turlough adjacent to the substation were raised as concerns.

Impacts on hedgerows from construction of trenches and joint bays were highlighted in submissions.

This section should be read in conjunction with Section 11 (Appropriate Assessment).

10.3.2. Examination of EIAR

1 Context

Chapter 5 addresses the topic of biodiversity and was prepared by SLR with Triturus. The approach of this chapter accords with the Environmental Protection Agency (EPA) advice on current practise in the preparation of environmental impact statements in selection of issues specifically examined.

The chapter makes reference to a broad range of national and international guidance documents, legislation and policy at section 5.1.4.

Study areas and survey results related to Biodiversity are set out in Annexes 5.1, 5.2 and 5.3.

2 Baseline

The baseline environment including details of all desk based and field survey works is set out in section 5.3. A Habitat survey was undertaken to Fossitt classification within the project site and is set out at table 5.7.

Bird survey results are set out in table 5.8, mammal survey in 5.3.4 and 5.3.5. survey for other fauna at 5.3.6. Fishery and aquatic survey results which include Otter are presented at 5.3.7.

Detailed description of international sites (SAC, cSAC, SPA, Ramsar) is set out in Table 5.4, Table 5.5 (pNHA) and Table 5.6 (NHA) list national sites, considered to fall within the Zone of Influence of the project with qualifying interests, and the source pathway receptor as identified in the submitted NIS.

Japanese knotweed *Fallopia japonica* was recorded in one location on a roadside verge.

Annex 2.3 sets out the alternative underground electricity line routes considered. Section 1.2 of the EIAR, project description, notes the extent of survey undertaken of the chosen cable route option. Annex 2.3 contains mapping demonstrating areas surveyed relative to that proposed.

3 Potential effects

Evaluation criteria and methodologies for assessment of significance of impacts, the determination of Zone of Influence, determination of importance, impact assessment, significance and cumulative, are all clearly set out within the chapter.

Project Phase	Potential Direct, Indirect and Cumulative Effects
Do Nothing	• Seven Hills windfarm not connected to grid.
Construction	• Significant indirect effects related to Water quality • Significant direct effects related to disturbance/displacement are likely to arise for birds • Any accidentally spread of pollutants into the Annex I turloughs south and southwest of the substation site, could lead to significant negative short-term effects on the regional scale. • The release of suspended solids, hydrocarbons or cement leachate to Cross river in the course of constructing the cable crossing could result in a significant negative effect on downstream species and habitats. • Spread of invasives
Operation	• Loss of agricultural grass land and stone walls (15m).

	• Collision, barrier, disturbance, displacement of ex situ species • Lighting of the substation could result in indirect effects on the assemblage of bats and could be significant negative permanent at the local higher scale.
Decommissioning	• the project will form part of the national electricity network and decommissioning of the project is not proposed. Therefore, decommissioning phase effects will not occur
Cumulative	• The potential for Cumulative effects in consideration of projects within a 15km radius is set out at section 5.5 which concludes that in the absence of mitigation, possible cumulative effects include deterioration of water quality within the catchment with potential for downstream effects on brook lamprey, otter, Annex I turloughs and wetland birds and amphibians that could use them

4 Mitigation

Definitions and methodologies for mitigation, compensation and enhancement are all clearly set out.

Table 5.14 Summary of Effects starting on page 5:109 sets out a clear summary of the identified direct and indirect effects along with consideration of cumulative, significance and mitigation measures as they relate to each identified effect.

To avoid widespread disturbance to birds, access is to be restricted to the footprint of the proposed works corridor. Avoidance of impact is proposed by way of spatial and temporal restrictions to works. Taking account of fluctuation in levels and extent of the turloughs to the south of the site it is proposed that the siting of the substation away from the turlough is mitigation of potential water and disturbance effect by design. Restricting construction of the substation to occur after erection of acoustic and visual screening serves to mitigate the potential for disturbance and displacement of overwintering species identified as using the turloughs and surrounding fields.

Horizontal Direction Drilling (HDD) works will only be undertaken over a dry period between July and September (as required by IFI for in-stream works) to avoid the salmon spawning season and to have more favourable (dryer) ground conditions. This will also have the effect of mitigating potential for disturbance of overwintering birds.

A 15m buffer for works from the Cross river is proposed along with a percolation area at 50m from the watercourse for disposal of water away from the cross river in order to mitigate potential identified impacts from works associated with HDD crossing.

An invasive species management plan is proposed as mitigation to avoid accidental spread.

Protection and replacement of any damaged hedgerow along with planting of new and bolstering of existing hedgerow is proposed.

The embedded mitigation proposed including an extensive drainage control system will prevent any surface run off effects occurring to any surface or groundwater body.

The EIAR proposes that risk to birds from construction disturbance at the substation site will be further mitigated by avoiding sensitive areas through the implementation of visual and acoustic screening, as well as to otter at the crossing by appropriately defined buffer zones, monitoring and by timing of construction activities to avoid periods where sensitive species are present.

5 Residual effects

This chapter concludes that with implementation of mitigation measures there will be no residual effects.

10.3.3. **Analysis, Evaluation and Assessment: Direct and Indirect Effects**

Following my analysis and evaluation of the available data related to the project and the receiving environment including as presented in the EIAR, my assessment is that the potential effects on biodiversity are concentrated at construction phase. The effects, alone and in culmination and in combination with other projects have been appropriately identified as, primarily effects arising from impacts on water bodies and disturbance/ displacement of species.

The potential for effects on water bodies are addressed by means of a comprehensive suite of mitigation measures set out in Chapter 7 of the EIAR. Mitigation measures related to water are addressed in more detail within my analysis evaluation and assessment of effects in section 10.5 of this report and are found to satisfactorily to address effects on biodiversity as identified in Chapter 5 Biodiversity of the EIAR.

The submission by the Department of Housing Local Government and Heritage sets out concerns regarding the potential for flight lines of whooper swans to intersect/transect with the proposed substation and interface masts. The department recommended seeking clarification or acquisition of additional data to address this observation. The applicant response contends that that the proposal entails no significant change to the existing 110 kV line and for that reason the proposal will not lead to an increased risk of effect. The proposal seeks to replace 1 pole set with 2 number new interface masts of between 15 and 18m in height. Pole sets to each side of the set to be replaced are separated by c. 285m these would represent fixed points between which the height of the overhead cable would increase. In the event that the uprating of the line as permitted is undertaken the magnitude of the increase is likely to be smaller.

The longstanding overhead line extends from Athlone to Lanesborough along the western shore of Lough Ree (c.36 km). Details submitted with planning application reg ref: RCC 2460559 indicate that the pole set proposed for removal in this application is 14m in height, the replacement pole sets in the area as permitted by reg ref: RCC 2460559 are to be 16m in height. The increase at the highest point following construction of the interface masts is in the range of 1-4m.

Taking account of the scale, extent and long standing nature of the existing overhead line along with the extent of the increase proposed relative to the existing overhead line, I am satisfied that there will be no material change to potential effects on whooper swans arising from the localised and relatively minor increase in height and introduction of new structures as a result of the proposed development.

The potential effect of disturbance of species during construction of the substation is mitigated by means of acoustic and visual screening of the substation site from the turloughs to the south as proposed in the EIAR and NIS. As noted elsewhere in this

report and as set out in the Appropriate Assessment, I recommend the extension of this screening to the western boundary of the substation construction site due to my observation of a flock of 100+ Lapwing in these fields during my site visit.

During my site inspection 07/02/2025 I observed a flock (150+) of whooper swans at a distance from circa 150m to the east of the proposed HDD crossing of the River Cross. This was an incidental sighting, no other record of whooper swans in this location has been identified. As works in this area are to be undertaken in summer months there is no potential for disturbance/displacement of wintering birds such as Whooper Swan.

Standard measures including separation buffers (15m) incorporating silt fencing are proposed as mitigation to protect surface water including at the Cross River crossing. The separation distances proposed exceed the c.8m application boundary width available in this location. However, I consider the principle of the water protection measures proposed to be appropriate subject to final design within the specific space constraints. Further detail and consideration of this issue is set out below in my assessment of Chapter 7 of the EIAR water.

10.3.4. Conclusion: Direct and Indirect Effects

Having reviewed this chapter of the submitted EIAR and inspected the subject site it is my opinion that subject to mitigation measures set out in the EIAR, CEMP and proposed conditions that there is no likelihood of significant direct or indirect effects on Biodiversity arising from the project alone or in cumulation with other plans or projects.

10.4. Land and Soil - Chapter 6

10.4.1. Issues raised

Submissions relevant to this chapter, set out in section 4 above include the following:

- baseline presented for geology including hydrogeology is inadequate to support the submitted assessment conclusions and that there is ample evidence to the contrary.
- Concerns about risks of construction leading to destabilisation of ground.

- Construction in Karst hydrogeology could lead to diversion of groundwater.
- Insufficient expertise available to the inspector and the Board to make an informed decision with regard to the hydrogeology of the area.

10.4.2. **Examination of EIAR**

1 Context

Chapter 6 Land and Soil was prepared by Michael Gill, Jenny Law and Conor McGettigan for specialist consultants Hydro-Environmental Services (HES) providing an assessment of the likely and significant effects of the project on the land, soil and geological environment. The chapter references a comprehensive list of legislation and guidance at sections 6.1.4 and 6.1.5.

2 Baseline

Extensive investigation of the hydrogeological context of the substation site is reported in the EIAR with trial holes, cores and geophysical investigations undertaken. Reporting of geophysical survey of the substation site by APEX Geophysics Limited is set out in annex 6.1 and intrusive site investigations by Ground Investigations Ireland Ltd (GII) in annex 6.2. A bedrock geology map and full borehole logs are provided in Annex 6.3.

The applicant contends that taking account of the testing undertaken the geological composition of the substation site was found not to be complex.

3 Potential effects

Project Phase	**Potential Direct, Indirect and Cumulative Effects**
Do Nothing	No effects
Construction	loss of agricultural land which will be replaced by electricity substation compound and on-site access tracks Excavated spoil management within the project could give rise to a potential negative effect via surface water management.
Operation	loss of agricultural land which will be replaced by electricity substation compound and on-site access tracks

Decommissioning	The project will form part of the national electricity network and decommissioning of the project is not proposed. Therefore, decommissioning phase effects will not occur
Cumulative	None

The EIAR concludes that potential impacts in the absence of mitigation are assessed to be negative, slight, direct, likely, permanent effect on land, land use, soil, subsoils and bedrock excavation. The only deviation from the characterisation of these potential effects is in consideration of erosion of soils and subsoils and the potential thereof for contamination, the effect of which is presented as short term.

The EIAR concludes that the potential effect of instability and failure arising from the construction of the electrical line in the road built over the area of cutover peat to be of a negligible likelihood by virtue of the depth and the nature of the excavation being into an existing roadway.

4 Mitigation

Mitigation and monitoring are set out in section 6.5 of the EIAR. Measures are extensive and include those proposed under hydrology and hydrogeology, with the associated Surface Water Management Plan and Construction Environmental Management Plan. Notable measures include the proper handling of excavated materials which include the temporary storage of excavated material from roads on the road edge. Operational phase measures are confined to good practice.

5 **Residual effects**

No significant residual effects are anticipated after application of mitigation.

10.4.3. **Analysis, Evaluation and Assessment: Direct and Indirect Effects**

The methodology is comprehensive and robust. The geophysical survey identified 2 no. zones of potential karstification within the site of the electricity substation, these were investigated, and no karst features were found. I am satisfied that the investigation and conclusions thereof were appropriate for the purpose of EIA.

Acknowledging the complexity and variability of karst geology generally I consider that an appropriate, precautionary and proportionate baseline has been established which adequately describes the baseline for the purpose of EIA of this project.

The road on each side of the river Cross is constructed over an area reported as being of cutover peat. There is visual evidence of structural movement in the parapet of the existing bridge with cracking along mortar joints and through concrete blocks. There is no overt evidence of significant movement of the road at the bridge or across the peat area. Reference is made in this chapter to a walkover survey and inspection of the section of road mapped as being underlain by peat which includes the bridge. The EIAR concludes that no further investigation was necessary.

The stability of the road currently, and the potential for impacts during and/or after trenching and HDD is identified, considered and dismissed in section 6.4.3.5. The EIAR concludes that the potential effect of instability and failure arising from the construction of the electrical line in the road built over the area of cutover peat to be of a negligible likelihood. I am of the opinion that subject to detailed measures in the final CEMP I am satisfied that the proposed mitigation measures are appropriate.

Taking account of the expert investigations of ground conditions, the relatively shallow depth, limited extent and duration of excavation for the electricity line, no impacts with potential for significant environmental effects are anticipated to any karst, peat or other features relevant to Land and Soil.

10.4.4. **Conclusion: Direct and Indirect Effects**

I have examined, analysed and evaluated Chapter 6 of the EIAR, all of the associated documentation and submissions on file in respect of Land and Soil. I am satisfied that the applicant understanding of the baseline environment, by way of desk and site surveys, is comprehensive and that the key impacts in respect of likely effects on land and soil including potential karst geology, as a consequence of the development have been identified. Submissions have raised concerns regarding impacts of the project alone and in combination with other projects particularly the Seven Hills Windfarm on the karst geology. I consider the investigations undertaken, the consideration given to the project alone cumulatively and in combination, and the conclusions reached in this regard to be comprehensive, precautionary in nature and proportionate. I conclude that subject to the proposed mitigation the proposal would not result in any likely significant effects on Land and Soils.

10.5. Water - Chapter 7

10.5.1. Issues raised.

- Concerns regarding potential impacts of the proposal alone and the context of wider development of the Seven hills windfarm on the dynamics of the karst hydrogeology of the area.
- That the baseline presented for geology including hydrogeology is inadequate to support the submitted assessment and conclusions and that there is ample evidence to the contrary.
- Surface and ground water quality and potential for flooding as a result of impacts on hydrogeological flow regimes as a result of works impacting on agriculture and on septic tanks in the area.
- Insufficient baseline for the Cross river.
- Impacts on Dolines from road trenching, dolines are protected by virtue of supporting/critical functioning of turloughs.
- Impacts of project on achievement of the objectives of the Water Framework Directive have been highlighted.

10.5.2. Examination of EIAR

1 Context

Chapter 7 Water was prepared by Michael Gill, Jenny Law and Conor McGettigan for specialist consultants Hydro-Environmental Services (HES) providing an assessment of the likely and significant effects of the project on the water environment including ground and surface water bodies. The chapter references a comprehensive list of legislation and guidance at sections 7.1.4 and 7.1.5 and references further reporting of geophysical survey of the substation site by APEX Geophysics Limited in annex 6.1, intrusive site investigations by Ground Investigations Ireland Ltd (GII) in annex 6.2 and WFD catchments in Annex 7.1. A detailed Flood Risk Assessment is presented in Annex 7.2. A Water Framework Directive Assessment (WFDA) presented as Annex 7.4 of the EIAR.

2 **Baseline**

Extensive evidence based qualitative and quantitative baseline is set out for surface and groundwater bodies in the zone of influence of the development with a detailed water body identification and classification of surface and ground water bodies as described in 2016-2021 WFD cycle at section 2 of the WFDA. The WFDA notes that it was drafted prior to finalisation of the River Basin Management plan for Ireland 2022-2027. The River Basin Management plan has since been published. The publication of the revised river basin management plan has not resulted in any impacts on the assessment or conclusions thereof.

The complexity of the Karst Hydrogeology of the area is acknowledged. A traced underground connection from Lough Funshinagh showing overall groundwater flow to the south, is noted. Turloughs are described in the context of surface water bodies within the EIAR. I consider the water baseline has been adequately described insofar as it relates to the undertaking of EIA for the subject proposal.

3 Potential effects

Likely significant effects of the development, as identified in the EIAR, include impacts from earthworks and handling of excavated and potentially hazardous materials such as hydrocarbons. Potential effects on the Cross river arising from the Horizontal Directional drilling are identified at section 7.4.3.8.

Project Phase	**Potential Direct, Indirect and Cumulative Effects**
Do Nothing	None
Construction	Earthworks (Removal of Vegetation Cover, Excavations and Stock Piling) Resulting in Suspended Solids Entrainment in Drainage Recharge Groundwater Flows and Levels due to Alteration of Recharge Rates Groundwater Levels During Excavation Works Accidental Release of Hydrocarbons Wastewater Disposal Release of Cement-Based Products Directional Drilling Works Effects on Karst Features Effects on the WFD Status Effects on Designated Sites Effects on Groundwater Supplies
Operation	Progressive Replacement of Natural Surface with Lower Permeability Surfaces Contaminated Runoff/Recharge

Decommissioning	the project will form part of the national electricity network and decommissioning of the project is not proposed. Therefore, decommissioning phase effects will not occur.
Cumulative	None

The Shannon (Upper)_110, the Ballybay_010 and the Cross (Roscommon)_010 and _020 SWBs, the Funshinagh Ground Water Body (GWB) and as a consequence Ballynamona Bog and Corkip Lough SAC (002339), Castlesampson Esker SAC / pNHA (001625), Lough Ree SAC / pNHA (000440) and SPA (004064) have been screened in for assessment. By virtue of being screened in for WFDA it follows that potential effects if unmitigated have been identified.

4 Mitigation

Mitigation measures are set out in section 7.5 of the EIAR and section 4.3 of the Water Framework directive Assessment report. Measures are extensive and include those proposed under hydrology and hydrogeology along with the associated Surface Water Management Plan and Construction Environmental Management Plan to prevent pollution of waterbodies including avoidance, silt fencing/bags, interception drains, check dams, settlement ponds, and discharge by infiltration across grasslands. Timing and monitoring measures are also set out therein.

Specific mitigation measures are described for the surface water protection at works required at the cable route crossing of the Cross river. A range of measures are proposed and include a proposed 15m buffer zone, a proposed percolation area in excess of 50m from the water course and the use of new alignments in the event of a frac-out.

5 Residual effects

No residual effects are anticipated by the EIAR in relation to water.

10.5.3. **Analysis, Evaluation and Assessment: Direct and Indirect Effects**

I have examined, analysed and evaluated Chapter 7 of the EIAR, all of the associated documentation and submissions on file in respect of the water environment. I am satisfied that the applicants understanding of the baseline environment, by way of desk and site surveys, is comprehensive and that the key impacts in respect of likely effects on water bodies, as a consequence of the

development have been identified. Submissions to the application have raised a number of issues in respect of water which are addressed below.

Investigation of ground conditions and hydrology of the substation site as presented in the EIAR is comprehensive and appropriate to the site and to the project. Amongst mitigation measures proposed for protection of water quality is the use of settlement ponds. The proposed location and/or extent of any such ponds has not been indicated within the application, I consider this to be a point of detail which can be agreed post consent.

As noted elsewhere in this report the narrow application boundary for the proposed electricity line presents a challenge to the application of generic surface water mitigation measures including separation buffers as referenced in the EIAR particularly at the crossing of the River Cross. Measures proposed include a 15m buffer zone incorporating silt fences, a proposed percolation area in excess of 50m from the water course and the use of new alignments in the event of a frac-out. The application of these measures as described are impractical due to the constrained nature of the application boundary at c. 8 meters across, and due to the proximity of the river running parallel to the road. However, I consider the principles of the suite of mitigation measures and methodologies to be acceptable subject to final design. Although the constrained nature of space available presents challenges, I am of the view that these can be addressed by use of construction methodologies utilised in constrained sites and can be agreed in the detailed post consent CEMP, I consider the final design of these measures to be a point of detail falling within the environmental envelope considered in this EIA. For that reason, where the Board are minded to grant approval a specific condition should be attached in this regard as drafted below.

Section 7.4.3.10 and 7.4.4.3 of the EIAR address the Effects on the WFD Status with a standalone Water Framework Directive Assessment Report at Annex 7.4 of the EIAR. That assessment concludes that the project is compliant with the requirements of the Water Framework Directive (2000/60/EC).

10.5.4. **Conclusion: Direct and Indirect Effects**

Having reviewed this chapter of the submitted EIAR it is my opinion that subject to mitigation there is no likelihood of significant direct or indirect effects alone, cumulative or in combination with other plans or projects on surface or groundwater quality following implementation of mitigation measures. In addition to the mitigation proposed I recommend that where The Board are minded to approve the proposal a requirement for specific agreement of construction and water control measures in and around the proposed HDD works should be included by condition.

10.5.5. Conclusion/determination of Water Framework assessment

In addition to consideration in Sections 7.4.3.10 and 7.4.4.3 of the EIAR a standalone Water Framework Directive Assessment Report is presented at Annex 7.4 of the EIAR. That assessment concludes that the project is compliant with the requirements of the Water Framework Directive (2000/60/EC).

The development site is located within the Funshinagh Groundwater Body. The substation site and the northern section of the electricity line are within the Upper Shannon (Lough Ree) regional surface water catchment within Hydrometric Area 26E. The southern section of the electricity line is in the Upper Shannon (Mid Shannon) regional surface water catchment within Hydrometric Area 26G. Both of these regional surface water catchments are situated in the Shannon Irish River Basin District.

The electricity substation site and c. 1.6km of the underground electricity line are in the Shannon (Upper)_110 WFD river sub-basin with c. 1.8km of the underground electricity line is mapped in the Ballybay_010 WFD river sub-basin.

Within the Upper Shannon Catchment, the project site is drained by the Cross (Roscommon) River with c. 1.4km of the underground electricity line mapped in the Cross (Roscommon)_010 WFD river sub-basin and c. 2.7km mapped in the Cross (Roscommon)_020 WFD river sub-basin. There is 1 no. mapped watercourse crossing, which is over the Cross (Roscommon) River in the townland of Derryglad. This is an existing crossing along a public road. It is proposed that the cable route will cross below the river at the location of the existing road crossing by way of HDD. The Cross (Roscommon) River is mapped as flowing to the southeast and discharges into the River Shannon downstream of Athlone.

Concerns were raised in the submissions regarding potential impacts on groundwater flow regimes.

No abstraction of groundwater or alteration of drainage patterns is proposed. Notwithstanding the complexity of the Karst hydrogeology of wider south Roscommon area, based on available data I am content that the quantitative status and the wider flow regime of receiving waters will not be adversely affected by the construction and operation phases of the proposal to any extent that could impact on the achievement of the objective of the Water Framework Directive.

With the application of various mitigation measures to protect surface and groundwaters, I am content that the qualitative status of waters will not be adversely affected by construction and operation phases of the project. I am therefore satisfied that the project will not affect any surface water body or groundwater body and will not cause a deterioration of the status of any such body and nor will it jeopardise the attainment of a 'Good' status in any water body.

I have assessed the proposal having regard to the objectives as set out in Article 4 of the Water Framework Directive to protect and, where necessary, restore surface and ground waterbodies in order to reach good status (meaning both good chemical and good ecological), and to prevent deterioration. Having considered the nature, scale and location of the project, I am satisfied that there is no conceivable risk to any surface and/or ground waterbodies.

The reason for this conclusion is as follows:

- Chapter 7 of the EIAR and The Water Framework Directive Assessment report at Annex 7.4 of the EIAR submitted by the applicant.
- Extensive baseline data collected relating to the hydrogeology for the site of the proposed substation including Annex 6.1 - Geophysical Investigation Report, and Annex 6.2 - Ground Investigation Report.
- Rainfall infiltrating through the subsoils to the groundwater aquifer will not change as a result of the project.
- The proposed cable route within and below existing road surfaces at shallow depths will result in no significant effects on groundwater.

- The design of the proposal generally and mitigation proposed relating to surface water control and protection of surface water bodies.
- A comprehensive set of mitigation measures are set out in section 4.3.1.5 relating to the HDD at the Cross river crossing.
- The project includes no abstraction from or emission to or other alteration of any water body or of drainage patterns.

I conclude that on the basis of objective information, that the proposed development will not result in a risk of deterioration on any waterbody (rivers, lakes, groundwaters, transitional and coastal) either on a temporary or permanent basis or otherwise jeopardise any water body in reaching its WFD objectives.

10.6. Air Quality and the Climate - Chapter 8

10.6.1. Issues raised

No issues raised in submissions received.

10.6.2. Examination of EIAR

1. Context

Chapter 8 Air Quality and the Climate was prepared by various members of the Galetech Energy Services (GES) Environment & Planning Team providing an assessment of the likely and significant effects of the project on Air Quality and Climate. The chapter references statutory provisions guidelines and air quality standards, and WHO targets relevant to air quality in Section 8.2.1 and Climate including International and National Guidelines, Policy and Legislation and resultant carbon budgets in section 8.2.2. The Climate Action Plan target of bringing 9GW of onshore wind power into production by 2030 is referenced.

2. Baseline

Baseline data for air quality, climate and sensitive receptors is presented from national data sets.

3. Potential effects

Project Phase	Potential Direct, Indirect and Cumulative Effects
Do Nothing	None
Construction	Dust emissions associated with the construction works GHG emissions from, Manufacture of materials, Materials transport to site and Construction works (including personnel travel and project size) peat to be excavated (145m3) and removed
Operation	Transmission of approximately 313GWh of renewable electricity per annum from permitted Seven Hills Windfarm off-setting c. 136,500 tonnes of CO2 equivalent per annum
Decommissioning	the project will form part of the national electricity network and decommissioning of the project is not proposed. Therefore, decommissioning phase effects will not occur.
Cumulative	None

4. Mitigation

Standard dust mitigation measures have been prepared in the form of a Planning-Stage Dust Minimisation Plan in Annex 8.1 to the EIAR.

5. Residual effects

Air Quality effects have been assessed to be imperceptible, short-term during the construction phase only, no residual effects are anticipated by the EIAR in relation to Climate.

10.6.3. Analysis, Evaluation and Assessment: Direct and Indirect Effects

I have examined, analysed and evaluated Chapter 8 of the EIAR and all of the associated documentation and submissions on file in respect of Air Quality and Climate. I am satisfied that the applicant understanding of the baseline environment, is comprehensive and that the key impacts in respect of likely effects of the project alone and in combination with other plans and projects on Air Quality and Climate, have been identified.

10.6.4. Conclusion: Direct and Indirect Effects

No issues have been raised by any party to the application in respect of Air quality and Climate. I have examined Chapter 8 of the EIAR which deals with this topic. Consideration of embodied carbon emitted during manufacture and construction is minimal in the chapter. However, I consider, in this instance taking account of the

nature of the project and site the information is adequate for the purpose of reaching a reasoned conclusion for the purpose of this EIA.

Having regard arrangements for the management of dust, and the transient nature of works on the cable route I am satisfied that there is no potential for any significant direct, indirect or cumulative negative effects alone or in combination on Air Quality and Climate as a result of the proposed development.

10.7. Landscape - Chapter 9.

10.7.1. Issues raised

Submissions contain concerns regarding, visual amenity negative landscape and visual impact of the proposed substation.

10.7.2. Examination of EIAR

1. Context

Chapter 9 describes the landscape context of the project and assesses the likely significant landscape and visual impacts on the receiving environment. The methodology employed is set out with reference to national and European guidance in section 9.1 and was prepared by Rory Curtis (GDip.LA MILI) of Macro Works Ltd. Photomontages are presented at Annex 9.2

1. Baseline

A study area for the assessment was determined to be a 5km radius around the electricity substation site. A baseline description is set out in section 9.3 including consideration of the landscape character as set out in the Roscommon Landscape Character Assessment and the related policy context set out in the Roscommon County Development Plan 2022-2028. A zone of theoretical visibility was established and is presented in Annex 9.1.

2. Potential effects

5 Viewpoints were chosen and photomontages (Annex 9.2) prepared to illustrate the modelled landscape and visual impacts.

Project Phase	Potential Direct, Indirect and Cumulative Effects

Do Nothing	None
Construction	Short term negative for substation Temporary low negligible effect for cable
Operation	Permanent negative of slight to moderate significance for substation
Decommissioning	None
Cumulative	low and extremely localised magnitude of impact cumulatively with Seven Hills windfarm.

3. Mitigation

Mitigation is proposed in the form of planting new and supplementing existing hedgerows, manging newly created grassland and allowing the proposed cut face in the northeast corner of the compound to colonise with indigenous species as shown in a Landscape & Ecological Mitigation Plan at Annex 9.3.

Where construction of the cable route including joint bays impact on roadside verges the EIAR mitigation proposes sowing grass and wildflower mixes.

5. Residual effects

No significant, pre-mitigation or residual landscape effects are assessed as likely to arise from the proposal on its own or cumulatively with other plans or projects. Taking account of the wider landscape context of the project remains not significant which is consistent with that presented in table 9.7 of the EIAR.

10.7.3. **Analysis, Evaluation and Assessment: Direct and Indirect Effects**

Having regard to the potential cumulative landscape and visual effects, I consider that the functional interdependency of the proposed substation with both the consented Seven Hills Windfarm and the proposed upgrade of the existing 110kV line will serve to limit the magnitude of the cumulative landscape and visual impact.

I have examined, analysed and evaluated Chapter 9 of the EIAR, all of the associated documentation and submissions on file in respect of Landscape. I am satisfied that the applicant understanding of the baseline environment, by way of desk and site surveys, is comprehensive and that the key impacts in respect of likely visual and landscape effects, as a consequence of the development have been adequately identified. I have taken account of the concerns raised in submissions, the permanent nature of the impact, the characteristics of the receiving environment

as well as the functional interdependency of the proposed substation with the consented Seven Hills Wind farm and the existing Athlone-Lanesborough 110kV Overhead Transmission Line.

10.7.4. Conclusion: Direct and Indirect Effects

Taking account of landscape and visual context which includes significant structures such as the 110kV Overhead Transmission Line and farmyard and the reported medium sensitivity of the wider landscape, the relatively small footprint of the substation and the distance/relative position to sensitive receptors, I conclude that there will be no significant landscape or visual effects arising from the project on its own or cumulatively.

10.8. Cultural Heritage - Chapter 10.

10.8.1. Issues raised

The submission of the Development Applications unit recommends a condition to address the potential for unknown archaeology.

10.8.2. Examination of EIAR

1. Context

Chapter 10 describes the cultural heritage context of the project and assesses the likely significant cultural heritage aspects of the receiving environment. The methodology employed is set out with reference to national and European guidance in section 10.2 and was prepared by Dermot Nelis BA ArchOxon AIFA MIAI (Horizon Archaeology).

2. Baseline

The baseline environment is described in section 10.4 of the EIAR and was prepared through a combination of desk-based research and field observations. The development site proposed for construction of the substation and cable route was analysed and described in adequate detail.

3. Potential effects

Project Phase	Potential Effects
Do Nothing	No effects
Construction	Likely permanent, direct and imperceptible construction phase effect on any previously unrecorded archaeological remains that may exist within the project site and which may be discovered during the construction phase
Operation	No effects
Decommissioning	No effects
Cumulative	Cumulative direct effects are not likely to occur during the construction phase of the project

4. Mitigation

Archaeological monitoring of all excavations associated with construction of the electricity substation shall be carried out under licence.

5. Residual effects

The visual impact of the substation on the wider setting is acknowledged. It is concluded that no significant residual effects are anticipated.

10.8.3. **Analysis, Evaluation and Assessment: Direct and Indirect Effects**

I have examined, analysed and evaluated Chapter 10 of the EIAR, all of the associated documentation and submissions on file in respect of Cultural Heritage, taking account of the submission received from the Department of Housing, Local Government and Heritage I am satisfied that the applicants understanding of the baseline environment, by way of desk and site surveys, is comprehensive and that the key impacts in respect of likely effects on cultural heritage, as a consequence of the development have been identified.

As a result of the deviation between archaeological mitigation by way of monitoring proposed in the EIAR and that which has been requested by the Department I recommend that where the Board are minded to grant approval that the condition recommended by the Department as the competent statutory authority be included as drafted below.

10.8.4. Conclusion: Direct and Indirect Effects

Having regard to the examination of environmental information pertaining to Cultural Heritage it is considered that by virtue of the location, relatively small footprint of the substation on agricultural land as well as the location of the cable route within the public roadway that, subject to the condition prescribed by the Development Applications Unit of the Department of Housing, Local Government and Heritage (the Department) there is no potential for significant environmental effects.

10.9. Noise and Vibration - Chapter 11.

10.9.1. Issues raised

Noise from substation impacts on human and animal health have been highlighted in a number of submissions to the application as set out in section 4 of this report.

10.9.2. Examination of EIAR

1. Context

Chapter 11 of the EIAR deals with Noise and Vibration and was prepared by Mike Simms BE MEngSc MIOA MIET, Principal Acoustic Consultant at AWN Consulting Ltd. Annex 11.1 (Volume II) presents a glossary of the acoustic terminology. The assessment was undertaken in accordance with best practice guidelines as described in section 11.3. The assessment methodology includes consultations with statutory/non-statutory agencies, desk top survey, and site specific noise monitoring/surveys. No limitations are identified nor evident in the assessment.

2. Baseline

The baseline environment is described in section 11.4 of the EIAR. Baseline monitoring was carried out by Robert Holohan, Acoustic Consultant with AWN Consulting and Cormac McPhillips, Technical Services Manager at Galetech Energy Services (GES). Baseline data adequate for the purpose of EIA was collected by way of attended and unattended monitoring.

6. Potential effects

The EIAR identifies the potential for a range of noise effects. Effects of the development, as identified in the EIAR, are summarised in the Table below.

Project Phase	Potential Direct, Indirect and Cumulative Effects
Do Nothing	None
Construction	Short term negative generation of significant levels of noise is possible Likely effect at the nearest Noise Sensitive Location associated with the construction of the electricity substation are assessed to be negative, temporary and not significant.
Operation	the operational noise effects are assessed to be neutral, imperceptible and long-term.
Decommissioning	the project will form part of the national electricity network and decommissioning of the electricity substation and associated infrastructure is not proposed.
Cumulative	no cumulative effects that would give rise to likely significant effects at the nearest noise sensitive locations.

7. Mitigation

While project specific noise mitigation measures were determined not be required, section 11.6 presents general guidance and best practice measures which will be followed by the contractor to ensure that no significant noise effects occur.

4. Residual effects

During the construction phase, there will likely be some effect on nearby noise sensitive locations due to noise emissions from site traffic and other activities. However, given the temporary nature and distances between the construction works and nearby noise sensitive properties, it is assessed that the noise generated will not be excessively intrusive. Residual effects are assessed to be likely, negative, not significant, and temporary.

10.9.3. **Analysis, Evaluation and Assessment: Direct and Indirect Effects**

Acoustic screening is proposed in Chapter 5 as mitigation for potential disturbance of birds as a result of substation construction. Birds or other noise sensitive species are not considered as receptors in the noise and vibration chapter of the EIAR however I

consider the issue to be adequately addressed in chapter 5, Biodiversity. The provision of acoustic screening as a mitigation measure for the potential impact on Bird Species will also have a mitigating effect on the residential noise sensitive receptors.

I have examined, analysed and evaluated Chapter 11 of the EIAR, all of the associated documentation and submissions on file in respect of noise. I am satisfied that the applicant understanding of the baseline environment, by way of desk and site surveys, is comprehensive and that the key impacts in respect of likely effects on the identified Noise Sensitive Receptors, as a consequence of the development have been identified, modelled and quantified to fall within a range determined not be significant in the context of the nature of the development. Notwithstanding the lack of cross reference within the relevant chapters including chapter 5 Biodiversity and 13 Interactions I consider chapter 11 to be adequate for the purpose of considering noise and vibration in the undertaking of the EIA.

10.9.4. **Conclusion: Direct and Indirect Effects**

Having regard to the examination of environmental information it is considered that by virtue of nature of the location and construction method for the cable route, and the substation, noise generation as modelled relative to sensitive receptors, subject to monitoring and mitigation which includes the acoustic screening of the substation site during construction I am satisfied there is no potential for significant individual or cumulative environmental effects arising from noise and vibration.

10.10. **Material Assets - Chapter 12.**

10.10.1. **Issues raised.**

Roscommon County Council raised concerns regarding medium- and long-term impacts on the road network.

The issue of stray electrical currents resulting in accelerated corrosion of metals with implications for water supplies in particular' has been raised in submissions.

The future of substation land on obsolescence of the windfarm is raised as a concern.

10.10.2. **Examination of EIAR**

1. Context

Chapter 12 of the EIAR deals with Material Assets primarily addressing transport and access; aviation; telecommunications; renewable and non-renewable resources; and utility infrastructure and was prepared by various members of the Galetech Energy Services ('GES') Planning & Environment Team.

The methodological approach to the assessment of each topic is set out at the start of each sub section with references to policy, guidelines, position papers, and consultations with statutory/non-statutory agencies, desk top and walk over surveys. No limitations are identified and none are evident in the assessment.

The environmental baseline with regards to material assets is adequately described for the purpose of the assessment.

2. Potential effects

Project Phase	**Potential Direct, Indirect and Cumulative Effects**
Do Nothing	None
Construction	Traffic and transport effects are assessed as not likely to be significant, are likely to be of short-term duration and ranging between moderate-slight and imperceptible negative.
Operation	the operational noise effects are assessed to be neutral, imperceptible and long-term.
Decommissioning	the project will form part of the national electricity network and decommissioning of the electricity substation and associated infrastructure is not proposed.
Cumulative	Cumulative effects on traffic and transport are assessed as likely to be no greater than moderate, indirect, negative and temporary.

3. Mitigation

Mitigations for impacts on transport relate to operation of a traffic management plan.

4. Residual effects

Residual effects during construction are short term and limited to increases in traffic volumes on roads in the vicinity of the project site and disruption caused due to traffic management measures (road closures and diversionary routes). With the implementation of mitigation measures (including monitoring), the assessment

concludes that no significant residual effects on material assets including in combination with existing, permitted or proposed developments will arise.

10.10.3. Analysis, Evaluation, Assessment and conclusion: Direct and Indirect Effects

I have examined, analysed and evaluated Chapter 12 of the EIAR, all of the associated documentation and submissions on file in respect of Material Assets. I am satisfied that the applicants understanding of the baseline environment, by way of desk and site surveys, is comprehensive and that the key impacts in respect of likely effects on the identified material assets, as a consequence of the development have been identified. Submissions have raised a number of issues in respect of roads in particular which I address as follows:

- The effects of electromagnetic radiation are addressed in consideration of principles set out in referenced publication by the grid operator in the population and human health chapter of the EIAR.
- Medium and long-term structural impacts on the road network are addressed by the design and construction of the proposed trenching along with the full road surface reinstatement.
- Concerns regarding the future of the agricultural land on obsolescence of the wind farm are addressed by reference to the fact that the substation becomes part of the grid and is not considered to be at risk of obsolescence.

10.10.4. Conclusion: Direct and Indirect Effects

Having regard to the examination of environmental information it is considered that there is no potential for significant direct, indirect and/or cumulative environmental effects on material assets.

10.11. Interaction of the Foregoing - Chapter 13

Interactions are shown by a means of a matrix, as set out in Table 13.1 with discussion on each identified interaction in subsequent text. I am satisfied that the applicant understanding and assessment of interactions is comprehensive, that the

key impacts in respect of likely effects have been identified and that no impacts that could magnify or accumulate effects through interaction are anticipated.

10.12. **Reasoned Conclusion on Significant Effects**

Having regard to the examination of environmental information contained above, and in particular to the EIAR, the submission received including from those from Roscommon County Council, the Department of Housing Local Government and Heritage as well the response by the developer to the submissions received in the course of the application the main significant direct and indirect effects of the proposed development on the environment are disturbance/displacement/ of birds and construction related surface water control and pollution. These effects are mitigated by means of scheduling works and screening of construction from birds as well as the operation of surface water and the pollution controls during construction. It is considered that there will be no significant direct and/or indirect effects arising from the proposed development on the environment with the implementation of the mitigation measures proposed by the EIA and compliance with conditions in the event of consent being granted. I am, therefore, satisfied that the proposed development would not have any unacceptable direct or indirect effects on the environment.

11.0 **Appropriate Assessment**

11.1. **Stage 1 AA screening Report**

See Appendix 1

In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in the AA screening, I conclude that it is not possible to exclude the potential that the proposed development alone will give rise to significant effects on:

- River Shannon Callows SAC
- Middle Shannon Callows SPA
- Ballynamona and Corkip Lough SAC
- Lough Ree SAC
- Lough Ree SPA

- Castlesampson Esker SAC
- River Suck Callows SPA

in view of these sites' conservation objectives. Appropriate Assessment is required.

This determination is based on:

- Objective information presented in the application including the Screening Report
- The zone of influence of potential impacts
- Distance and connectivity and pathways to European Sites
- The conservation objectives of each site.

11.2. **Stage 2 Appropriate Assessment**

See Appendix 1

In screening the need for Appropriate Assessment, it was determined that the proposed development could result in significant effects on River Shannon Callows SAC 000216, Middle Shannon Callows SPA 004096, Ballynamona and Corkip Lough SAC 002339, Castlesampson Esker SAC 001625, River Suck Callows SPA 004097, Lough Ree SAC 000440 and Lough Ree SPA 004064 in view of the conservation objectives of those sites and that Appropriate Assessment under the provisions of S177U was required.

Following an examination, analysis and evaluation of the proposal and receiving environment, the NIS and all associated material submitted including observations of the Department of Housing, Local Government and Heritage, I consider that adverse effects on site integrity of the River Shannon Callows SAC 000216, Middle Shannon Callows SPA 004096, Ballynamona and Corkip Lough SAC 002339, Castlesampson Esker SAC 001625, River Suck Callows SPA 004097, Lough Ree SAC 000440 and Lough Ree SPA 004064 can be excluded in view of the conservation objectives of these sites and that no reasonable scientific doubt remains as to the absence of such effects.

My conclusion is based on the following:

- Detailed assessment of construction and operational impacts.
- Assessment of the immediate and wider receiving environment and components thereof insofar as they relate to and support the functioning of

the network of Natura sites towards the achievement of conservation objectives. Including:

- Consideration of potential qualitative and quantitative impacts on surface and groundwater bodies and the relationship of those waterbodies to species and habitats including conservation objectives of the above referenced Natura sites.
- Consideration of ex situ impacts on mobile species which are conservation objectives of the above referenced Natura sites.

- the proposed development will not affect the attainment of conservation objectives for River Shannon Callows SAC 000216, Middle Shannon Callows SPA 004096, Ballynamona and Corkip Lough SAC 002339, Castlesampson Esker SAC 001625, River Suck Callows SPA 004097, Lough Ree SAC 000440 and Lough Ree SPA 004064 or prevent or delay the restoration of favourable conservation condition as relevant.
- Effectiveness of mitigation measures proposed and amended by proposed conditions as recommended for application where The Board are minded to approve the application.
- Application of planning conditions to:
  - Extend the requirement for construction phase noise barriers at the substation site to include the western boundary.
  - Restrict construction of the cable route and HDD crossing of the River Cross to the summer period to ensure the mitigation of impacts on QI winter populations of birds is ensured.

12.0 **Recommendation**

I recommend that the Board approve the application for the proposed development for the following reasons and considerations, subject to the conditions set out below.

13.0 Reasons and Considerations

The Board performed its functions in relation to the making of its decision, in a manner consistent with Section 15(1) of the Climate Action and Low Carbon Act 2015, as amended by Section 17 of the Climate Action and Low Carbon Development (Amendment) Act 2021, (consistent with the Climate Action Plan 2025 and Climate Action Plan 2024 and, The National Adaptation Framework; Planning for a Climate Resilient Ireland June 2024 and approved sectoral adaptation plans set out in those Plans and in furtherance of the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State).

And in coming to its decision, the Board had regard to the following:

(a) European, national, regional and local planning, energy, climate and other policy of relevance, including in particular the following:

European, policy/legislation including:

- Directive 2014/52/EU amending Directive 2011/92/EU (Environmental Impact Assessment Directive)
- Directive 92/43/EEC (Habitats Directive) and Directive 79/409/EEC as amended by 2009/147/EC (Birds Directive);
- Directive 2000/60/EC (Water Framework Directive)
- EU Directive 2009/28/EC and Directive 2018/2001/EU (Renewable Energy)
- EU 2030 Climate and Energy Framework
- EU Energy Roadmap 2050
- REPowerEU Plan May 2022

National Policy and Guidance including:

- National Development Plan 2021-2030
- National Planning Framework (first review April 2025)
- National Energy Security Framework (April 2022)
- National Energy & Climate Action Plan 2021-2030
- National Biodiversity Action Plan 2023-2030

- Long-term Strategy on Greenhouse Gas Emissions Reduction (2024);
- Policy Statement on Security of Electricity Supply (November 2021);

Regional and local policy support for developing renewable energy, in particular:

- Northern and Western Regional Assembly's Regional Spatial & Economic Strategy, 2020-2032
- Roscommon County Development Plan 2022-2028,

b) The nature, scale, extent and layout of the proposed development,

c) The pattern of development within the area and context of the receiving environment, including the absence of any specific conservation or amenity designation for the site,

d) Documentation submitted with the application,

e) The submissions on file including those from observers, prescribed bodies and the Planning Authority,

f) Mitigation measures proposed for the construction and operation of the development,

g) The national targets for renewable energy contribution to the overall national grid,

h) The proximity of the proposal to the 110kV overhead line and the permitted wind farm (Ref. ABP. 313750-22),

i) The distance to dwellings and other sensitive receptors from the proposed development,

Proper Planning and Sustainable Development

It is considered that, subject to compliance with the conditions set out below, the proposed development would accord with European, National, Regional and Local planning and related policy, would not have an unacceptable impact on the character of the landscape or on cultural heritage, would not seriously injure the visual and residential amenities of the area, would be acceptable in terms of public health, traffic safety, would not have undue impacts on surrounding land uses, would not have an unacceptable impact on ecology or on any European Site, would not lead to

an increased risk of flooding within the site or adjoining lands, and would make a positive contribution to Ireland's requirements for renewable energy in accordance with national regional and local policy. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

Stage 1 Screening for Appropriate Assessment

The Board agreed with the screening assessment and conclusion carried out in the Inspector's report that the River Shannon Callows SAC 000216, Middle Shannon Callows SPA 004096, Ballynamona and Corkip Lough SAC 002339, Castlesampson Esker SAC 001625, River Suck Callows SPA 004097, Lough Ree SAC 000440 and Lough Ree SPA 004064 are European sites for which there is a possibility of significant effects and must therefore be subject to Appropriate Assessment.

Stage 2 Appropriate Assessment

The Board considered the Natura Impact Statement and all other relevant submissions including observations of the Department of Housing, Local Government and Heritage and carried out an appropriate assessment of the implications of the proposed development for European Sites in view of the Conservation Objectives for River Shannon Callows SAC 000216, Middle Shannon Callows SPA 004096, Ballynamona and Corkip Lough SAC 002339, Castlesampson Esker SAC 001625, River Suck Callows SPA 004097, Lough Ree SAC 000440 and Lough Ree SPA 004064. The Board considered that the information before it was sufficient to undertake a complete assessment of all aspects of the proposed development in relation to the sites conservation objectives using the best available scientific knowledge in the field.

In completing the assessment the Board considered, in particular, the following:

(i) Site Specific Conservation Objectives for these European Sites,

(ii) Current conservation status, threats and pressures of the qualifying interest features including Otter, Whooper Swan, Lapwing, Wetlands, Turloughs, Bog woodland, Little Grebe, Wigeon, Teal, Mallard, Shoveler, Tufted Duck, and Coot.

(iii) Likely direct and indirect impacts arising from the proposed development both individually or in combination with other plans or projects, specifically Seven Hills

Windfarm, and the uprating of the Athlone to Lanesboro 110 kV overhead line and others set out in section 5.4 of the NIS

(iv) Mitigation measures which are included as part of the current proposal.

In completing the Appropriate Assessment, the Board accepted and adopted the Appropriate Assessment carried out in the Inspector's report in respect of the implications of the proposed development on the integrity of the aforementioned European sites, having regard to the sites Conservation Objectives.

In overall conclusion, the Board was satisfied that the proposed development would not adversely affect the integrity of European sites in view of the sites Conservation Objectives and there is no reasonable scientific doubt as to the absence of such effects.

Environmental Impact Assessment reasoned conclusion

The Board completed an environmental impact assessment of the proposed development taking account of:

a. the nature, scale and extent of the proposed development,
b. the Environmental Impact Assessment Reports (EIAR's) and associated documentation submitted in support of the application,
c. the Screening for Appropriate Assessment and NIS and associated documentation submitted in support of the application,
d. the planning authority reports, and the submissions received from the Observers and Prescribed Bodies, and
e. the Inspector's report.

The Board considered that the environmental impact assessment report, supported by the documentation submitted by the applicant, adequately considers alternatives to the proposed development, and identifies and describes adequately the direct, indirect, residual and cumulative effects of the proposed development on the environment.

The Board agreed with the examination, set out in the Inspector's report, of the information contained in the environmental impact assessment report and associated

documentation submitted by the applicant and submissions made in the course of the application.

The Board considered, and agreed with the Inspectors reasoned conclusions, that the main significant direct and indirect effects of the proposed development on the environment are disturbance/displacement of birds and construction related control of surface water and pollution. These effects are mitigated by means of scheduling works, screening of construction from birds and operation of surface water and the pollution controls during construction.

The Board completed an environmental impact assessment in relation to the proposed development and concluded that, subject to the implementation of the mitigation measures proposed as set out in the Environmental Impact Assessment Report, and subject to compliance with the conditions set out below, the effects of the proposed development on the environment, by itself and in combination with other plans and projects in the vicinity, would be acceptable. In doing so, the Board adopted the report and conclusions of the Inspector.

14.0 Conditions

1. The proposed development shall be carried out and completed in accordance with the plans and particulars lodged with the application, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the proposed development shall be carried out in accordance with the agreed particulars.

Reason: In the interest of clarity.

2. The period during which the development hereby permitted may be carried out shall be 10 years from the date of this Order.

Reason: Having regard to the nature of the development and its interdependent relationship to other developments, the Board considers it appropriate to specify a period of validity of this consent in excess of five years.

3. The mitigation measures contained in Annex 1.7 the submitted Environmental Impact Assessment Report (EIAR), shall be implemented in full.

Reason: To protect the environment.

4. In addition to mitigation measures set out in Chapter 10 of the EIAR

a. The developer shall engage a suitably qualified archaeologist to monitor (licensed under the National Monuments Acts) all site clearance works, topsoil stripping or groundworks associated with the development.

i. The use of appropriate machinery to ensure the preservation and recording of any surviving archaeological remains shall be necessary.

ii. Should archaeological remains be identified during the course of archaeological monitoring, all works shall cease in the area of archaeological interest pending a decision of the Planning Authority, in consultation with the Department, regarding appropriate mitigation.

iii. The developer shall facilitate the archaeologist in recording any remains identified.

iv. Any further archaeological mitigation requirements specified by the Planning Authority, following consultation with the Department, shall be complied with by the developer.

b. The Construction Environment Management Plan (CEMP) shall include the location of any and all archaeological or cultural heritage constraints relevant to the proposed development as set out in Chapter 13 of the EIAR and by any subsequent archaeological investigations associated with the project. The CEMP shall clearly describe all identified likely archaeological impacts, both direct and indirect, and all mitigation measures to be employed to protect the archaeological or cultural heritage environment during all phases of site preparation and construction activity.

c. The Planning Authority and the Department shall be furnished with a final archaeological report describing the results of all archaeological monitoring and any archaeological investigative work/excavation required, following the completion of all archaeological work on site and any necessary post-

excavation specialist analysis. All resulting and associated archaeological costs shall be borne by the developer.

Reason: To ensure the continued preservation (either in situ or by record) of places, caves, sites, features or other objects of archaeological interest.

5. In advance of commencement the applicant shall receive written agreement of the planning authority to a complete schedule of mitigation measures including those described in section 5.7 of the submitted Natura Impact Statement (NIS) subject to the additions/amendments below. The schedule shall identify who is responsible for the implementation of these measures and a timescale for implementation. The schedule of Mitigation measures shall be implemented in full:
    i. No trenching, backfilling, road reinstatement or HDD drilling shall be undertaken in the Townlands of Derryglad or Eskerbaun in the months from October to March inclusive in order to avoid disturbance of Whooper Swans or other wintering birds utilising this area.
    ii. Temporary acoustic and visual barriers described in section 5.7.1.8 of the submitted Natura Impact Statement NIS shall extend to the western boundary of the substation construction site in addition to that proposed to the southwest.
    iii. Construction details/measures for surface water control including drawings in plan and cross section to a suitable scale at
        a. the site of the substation and at
        b. the crossing of the Cross River.
    iv. Detailed construction details/measures for directional drilling below the Cross River.

Reason: To protect the environment and the integrity of European sites and prevent disturbance of ex-situ wintering bird species in the vicinity of the works.

6. All road surfaces, culverts, watercourses, verges, and public lands shall be protected during construction and, in the case of any damage occurring, shall

be reinstated to the satisfaction of the planning authority at the developer's expense. Prior to commencement of development, a road condition survey shall be carried out to provide a basis for reinstatement works. Details in this regard shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Reason: In order to protect the road network

7. The developer shall comply with the following requirements:
   a) Prior to commencement the final construction height of interface masts shall be agreed with the planning Authority.
   b) No additional artificial lighting shall be installed or operated on site unless authorised by a prior grant of planning permission.
   c) External finishes to fencing, gates and exposed metalwork (non-galvanised/subject to EirGrid requirements), roof and external walls of substation, and interface masts, shall comply with the requirements of the planning authority.

Reason: In the interest of clarity, of visual and residential amenity.

8. Prior to the commencement of development, details of CCTV cameras shall be submitted to the planning authority for written agreement. These shall be fixed and angled to face into the site and shall not be directed towards adjoining property or roads.

Reason: In the interest of clarity, of visual and residential amenity.

9. Site development and building works shall be carried out between the hours of 08:00 to 16:00 Mondays to Saturdays and not at all on Sundays and public holidays. Deviation from these times shall only be allowed in exceptional circumstances where prior written agreement has been received from the planning authority.

Reason: For consistency with the Seven Hills Windfarm consent working hours and to safeguard the amenity of property in the vicinity.

10. The landscaping scheme shown in Annex 9.3 Volume II of the EIAR on drawing number LD.SVNHLLS-SBST 1.0, shall be carried out within the first planting season following commencement unless as otherwise agreed with the Planning Authority. All new planting shall be of native Irish species only unless otherwise agreed.

    All planting shall be adequately protected from damage until established. Any plants which die, are removed or become seriously damaged or diseased, within a period of five years from the completion of the development, shall be replaced within the next planting season with others of similar size and species, unless otherwise agreed in writing with the planning authority.

Reason: In the interest of residential and visual amenity.

11. Prior to commencement of development, a detailed Construction Environmental Management Plan (CEMP), incorporating a Traffic Management Plan for the construction phase shall be submitted to and agreed in writing with the planning authority, generally in accordance with the Outline Construction Methodology submitted with the application. The CEMP shall incorporate the following:

a.

i. Project Supervisor for the Design Process (PSDP), Project Supervisor Construction Stage (PSCS) and involved contractors shall be provided to the Planning Authority

ii. All necessary insurances and performance bonds

iii. Consultation with An Garda Síochana, emergency services and public transport operators in the area

iv. Community Liaison Officer consultation with, inter alia schools, the public, local residents, business owners, and elected officials

v. Road closure licences, diversionary routes and temporary road work speed limits required. Applications to be made a minimum of 8-weeks prior to the closure period. All signage by applicant.

vi. Pre-condition survey to the satisfaction of the planning authority of haul routes and the route of the underground electricity line and adjoining private entrances and boundary structures with structural surveys of adjoining properties where necessary.

vii. Any proposed deviation from Transport Infrastructure Ireland's Specification for Road Works

viii. All public roads within which the underground electricity line is installed will be subject to a full-carriageway (i.e. full road width) reinstatement and all reinstatement proposals shall be agreed with the Planning Authority

ix. All ironworks, road marking and road studs shall be reinstated to their original condition;

x. Full details will be provided relating to any interactions with existing services and watercourse crossings

xi. A 2-year defects liability period

(b) A detailed plan for the construction phase incorporating, inter alia, construction programme, supervisory measures, noise, dust, and surface water management measures including appointment of a site noise liaison officer, construction hours and the management, transport and disposal of construction waste. This shall address any concurrent construction phase of the Seven Hills Wind Farm.

(c) a comprehensive programme for the implementation of all monitoring commitments made in the application and supporting documentation during the construction period;

(d) an Invasive Species Eradication and Management Strategy for the site, to include monitoring post completion of works;

(e) an emergency response plan;

(f) proposals in relation to public information and communication. A record of daily checks that the works are being undertaken in accordance with the Construction Environmental Management Plan shall be kept for inspection by the planning authority.

Reason: In the interest of environmental protection and orderly development.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

Hugh O'Neill
Planning Inspector
25 June 2025

Appendix 1

Screening the need for Appropriate Assessment Stage 1

Screening for Appropriate Assessment Test for likely significant effects	
Step 1: Description of the project and local site characteristics	
Brief description of project	A 110kV substation and 7.5km underground cable is proposed to connect the Seven Hills Windfarm to the 110kV transmission line. This includes replacement of an existing wooden pole set with 2 no. 15 to 18m high lattice-type interface masts.
Brief description of development site characteristics and potential impact mechanisms	The application site consists of 2 main elements, the 110KV sub station and associated connections and a c.7.5km cable route and its associated connections. The proposed substation is contained within an agricultural field of free draining soil defined by a mix of stone walls, post and sheep wire fences and hedgerow. The site was under grass and being grazed by sheep at the time of site inspection. A 110kV transmission line traverses the northern end of the site in a south east to north west direction to which the grid connection is proposed. There is a farmyard complex to the east of the site consisting primarily of slatted sheds. The cable route which includes junction bays is proposed to be constructed for the most part within local and to a lesser extent regional roads both road categories are bound by a hedgerows, stone walls verges and domestic boundary treatments.

	The cable route is proposed below the Cross River by way of HDD. There are turloughs (Annex I habitats) located less than 200m to the south of the proposed substation. There are no other water bodies with surface expression on or in close proximity of the site. A more detailed description of the receiving environment is set out at section 3.2.2 of the submitted screening report.
Screening report	Y
Natura Impact Statement	Y
Relevant submissions	**Department of Housing Local Government and Heritage** Concern regarding potential for the flight lines of Whooper Swan utilising the area to intersect with substation. **Public submissions raised concerns relating to:** hydrogeological connections from the proposal to groundwater dependent protected habitats, adequacy of expertise available to ABP and methodology in proposal to exclude potential impacts. Four roads Turlough SAC/SPA and Feacle Turlough pNHA and tracked connections with Funshinagh Tubermore springs and Feacle turlough specifically mentioned. Project splitting with seven Hills, (reference to NPWS scoping response). Cumulative effect with pumped water from Lough Funshinagh.

	Inadequate baseline including, ornithological studies conducted for the proposal and Seven Hills Wind Farm irreconcilable. Noise and other impacts on wildlife including named species a number of which are subject to protection. A broader summary of issues raised in submissions is set out in section 4 of the inspector's report.

This proposal is integral to the permitted Seven Hills Windfarm and proposes an alternative Grid connection from to that which is permitted.

Planning application (PD/24/60559) to Roscommon County Council to uprate the existing Athlone to Lanesboro 110 kV overhead line was granted permission By RCC following, further information relating to AA and arising from NPWS reporting. See the planning history section of inspector report for further detail.

Step 2. Identification of relevant European sites using the Source-pathway-receptor model

The AA screening report submitted as part of the NIS included a more extensive list than is set out in this screening. The submitted screening report utilised a 15 km study area for SACs, whilst a different approach was undertaken for SPAs, following NatureScot guidance on dispersal and foraging ranges of bird species which are frequently encountered when considering plans and projects.

European Site (code)	Qualifying interests[1] Link to conservation objectives (NPWS, date)	Approx km from proposal	Ecological connections[2]	Consider further in screening[3]
Lough Funshinagh SAC 000611	https://www.npws.ie/protected-sites/sac/000611 COs date: 19 Feb 2018 Turloughs [3180] Rivers with muddy banks with Chenopodion rubri p.p. and Bidention p.p. vegetation [3270]	2	Potential remote indirect hydrogeological connection to GWDTE habitats that share the Funshinagh groundwater body, but excluded by consideration of pathway as Lough Funshinagh SAC	**N**

			is up gradient of the proposal as demonstrated with traced connections.	
Ballynamona Bog and Corkip Lough SAC 002339	https://www.npws.ie/protected-sites/sac/002339 COs date: 23 Sep 2016 Turloughs [3180] Active raised bogs [7110] Degraded raised bogs still capable of natural regeneration [7120] Depressions on peat substrates of the Rhynchosporion [7150] Bog woodland [91D0]	1	Potential upstream hydrological connection via Cross and Barr's Drain watercourses (instream distance 6.6 km). Potential groundwater connection to Turlough and bog woodland habitats	**Y**
Castlesampson Esker SAC 001625	https://www.npws.ie/protected-sites/sac/001625 COs date: 21 Oct 2021 Turloughs [3180] Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210]	4	Potential hydrogeological connection to ~QI turlough.	**Y**
Lough Ree SAC 000440	http://www.npws.ie/protected-sites/sac/000440 COs date: August 2016 Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation [3150] Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210] Active raised bogs [7110]1 Degraded raised bogs still capable of natural regeneration [7120] Alkaline fens [7230] Limestone pavements [8240] Bog woodland [91D0] Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) [91E0] 1 Lutra lutra (Otter) [1355] 1Note: There are no site specific conservation objectives for active raised bogs or alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae).	1.7	Potential upstream hydrological connection via Cross [Roscommon] and Shannon [Upper] watercourses (instream distance 17.2 km). Potential hydrogeological connection to GWDTE habitats that potentially share the Funshinagh groundwater body.	**Y**

River Shannon Callows SAC 000216	River Shannon Callows SAC | National Parks & Wildlife Service CO's: 18 Jan 2022 *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*) [6410] Lowland hay meadows (*Alopecurus Sanguisorba officinalis*) [6510] Alkaline fens [7230] Limestone pavements [8240] Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion, Alnion incanae, Salicion albae*) [91E0] Otter *Lutra lutra* [1355]	9	Downstream hydrological connectivity via Cross and Shannon river. Otter recorded 2.8km down stream of proposal.	**Y**
Lough Ree SPA 004064	https://www.npws.ie/protected-sites/spa/004064 COs date: 12/10/2022 Little Grebe (Tachybaptus ruficollis) [A004] Whooper Swan (Cygnus cygnus) [A038] Wigeon (Anas penelope) [A050] Teal (Anas crecca) [A052] Mallard (Anas platyrhynchos) [A053] Shoveler (Anas clypeata) [A056] Tufted Duck (Aythya fuligula) [A061] Common Scoter (Melanitta nigra) [A065] Goldeneye (Bucephala clangula) [A067] Coot (Fulica atra) [A125] Golden Plover (Pluvialis apricaria) [A140] Lapwing (Vanellus vanellus) [A142] Common Tern (Sterna hirundo) [A193] Wetland and Waterbirds [A999]	1.8	Mobile QI species with core foraging areas in excess of the distance between the development site and the SPA.	**Y**
River Suck Callows SPA 004097	https://www.npws.ie/protected-sites/spa/004097 COs date: 04 Apr 2025 Whooper Swan (Cygnus cygnus) [A038] w Wigeon (Mareca penelope) [A050] w Golden Plover (Pluvialis apricaria) [A140] w Lapwing (Vanellus vanellus) [A142] w	8.8	Mobile QI species with core foraging areas in excess of the distance between the development site and the SPA.	**Y**

	Greenland White-fronted Goose (Anser albifrons flavirostris) [A395] w Wetland and Waterbirds [A999]			
Lough Croan Turlough SPA 004139	https://www.npws.ie/protected-sites/spa/004139 Shoveler (*Anas clypeata*) [A056] r, w Golden Plover (*Pluvialis apricaria*) [A140] w Greenland White-fronted Goose (*Anser albifrons flavirostris*) [A395] w Wetland and Waterbirds [A999]	5.4	Mobile QI species out of best evidence range, not recorded in surveys.	**N**
Middle Shannon Callows SPA 004096	https://www.npws.ie/protected-sites/spa/004096 Nov 2022 Whooper Swan (Cygnus cygnus) [A038] Wigeon (Anas penelope) [A050] Corncrake (Crex crex) [A122] Golden Plover (Pluvialis apricaria) [A140] Lapwing (Vanellus vanellus) [A142] Black-tailed Godwit (Limosa limosa) [A156] Black-headed Gull (Chroicocephalus ridibundus) [A179] Wetland and Waterbirds [A999]	9	Mobile QI species with core foraging areas in excess of the distance between the development site and SPA.	**Y**
Four Roads Turlough SPA 004140	https://www.npws.ie/protected-sites/spa/004140 COs: 24 Jan 2025 Golden Plover (*Pluvialis apricaria*) [A140] w Greenland White-fronted Goose (*Anser albifrons flavirostris*) [A395] w Wetland and Waterbirds [A999]	11	Mobile QI species out of best evidence range, not recorded in surveys	**N**

Step 3. Describe the likely effects of the project (if any, alone or in combination) on European Sites

Likely significant effects alone:

Downstream Hydrological connectivity to the River Shannon Callows SAC and Middle Shannon Callows SPA with a potential effect by way of a reduction in the quality of Annex I habitats or habitats that support Annex species requires further consideration.

The identified potential for hydrogeological connectivity of Ballynamona and Corkip Lough SAC, Lough Ree SAC, Lough Ree SPA and Castlesampson Esker SAC to the project site, and a potential effect by way of a reduction in the quality of Annex I habitats or habitats that support Annex species requires further consideration.

Potential ecological connectivity between the River Shannon Callows SAC Lough Ree SPA, River Suck Callows SPA and Middle Shannon Callows SPA and the project site and a potential effect by way of a reduction in the quality of Annex I habitats or habitats that support Annex species by way of disturbance requires further consideration.

The submission of the **Department of Housing Local Government and Heritage** highlight the potential for the substation site to intersect/transect with Whooper Swan Flight paths.

Step 4 Conclude if the proposed development could result in likely significant effects on a European site

It is not possible to exclude the possibility that proposed development alone would result significant effects on:

- River Shannon Callows SAC
- Middle Shannon Callows SPA
- Ballynamona and Corkip Lough SAC
- Lough Ree SAC
- Lough Ree SPA
- Castlesampson Esker SAC
- River Suck Callows SPA

from effects associated with a reduction in the quality of Annex I habitats or habitats that support Annex species including by disturbance/displacement during the construction phase.

An appropriate assessment is therefore required on the basis of the possible effects of the project 'alone'. Further assessment in-combination with other plans and projects is not required at screening stage.

Screening Determination

Significant effects cannot be excluded

In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that it is not possible to exclude the potential that the proposed development alone will give rise to significant effects on:

- River Shannon Callows SAC
- Middle Shannon Callows SPA
- Ballynamona and Corkip Lough SAC
- Lough Ree SAC
- Lough Ree SPA
- Castlesampson Esker SAC
- River Suck Callows SPA

in view of these sites conservation objectives. Appropriate Assessment is required.

This determination is based on:

- Objective information presented in the application including the Screening Report
- The zone of influence of potential impacts
- Distance and connectivity and pathways to European Sites,
- The conservation objectives of each site.

Appropriate Assessment. Stage 2

The Natura Impact Statement

The application includes a Natura Impact Statement (NIS) prepared by SLR Environmental Consulting (Ireland) Ltd (SLR) dated on the title page as 30 August 2024 with a final revision date in the revision record as 18 September 2024. The NIS included a Screening for Appropriate Assessment. (see determination above).

Template 3: Standard AA Template and AA Determination

Appropriate Assessment
The requirements of Article 6(3) as related to appropriate assessment of a project under part XAB, sections 177V of the Planning and Development Act 2000 (as amended) are considered fully in this section.
Taking account of the preceding screening determination, the following is an appropriate assessment of the implications of the proposed development, described in section 5.1 of the NIS, of a 110kV substation and c. 7.5km underground cable proposed to connect the Seven Hills Windfarm to the 110kV transmission line including replacement of an existing wooden pole set with 2 no. 15 to 18m high lattice-type interface masts in view of the relevant conservation objectives of • River Shannon Callows SAC • Middle Shannon Callows SPA • Ballynamona and Corkip Lough SAC • Lough Ree SAC • Lough Ree SPA • Castlesampson Esker SAC • River Suck Callows SPA based on scientific information provided by the applicant and considering relevant opinions set out in submissions received to the application. The information relied upon includes the following: • Natura Impact Statement prepared by SLR Environmental Consulting (Ireland) Ltd (SLR) dated with the date of 30 August 2024 on the title page and a final revision date of 18 September 2024 including appendices • Energia Renewables ROI Limited (2024) Moyvannan Electricity Substation Environmental Impact Assessment Report (Energia Renewables ROI Limited, 2024); • SLR (2024) Moyvannan – Bird Survey Report Non-Breeding Season 2023-24 (SLR, 2024) (Appendix B of NIS); • Triturus Environmental Ltd (2024) Aquatic ecological assessment of the Cross River, northwest of Athlone, Co. Roscommon (Triturus, 2024) (Appendix C of NIS); • Outline CEMP (Appendix E of NIS)

- Direct observations made during inspection of the site on 07/02/2025
- Burke, B. et al., 2021. Population size, breeding success and habitat use of Whooper Swan Cygnus cygnus and Bewick's Swan Cygnus columbianus bewickii in Ireland: results of the 2020 International Swan Census. Irish Birds, Volume 43, pp. 57-70.
- Goodship, N. & Furness, R., 2022. Disturbance Distances Review: An updated literature review of disturbance distances of selected bird species. A report from MacAruthur Green to NatureScot, Battleby: NatureScot.
- Site Synopses, Conservation Objectives and Standard Data Forms for European Sites
- National Planning Database; Department of Housing, Local Government and Heritage; Available at https://data.gov.ie/dataset/national-planning-applications;
- Energia Renewables ROI Limited (2022) Proposed Seven Hills Wind Farm, Co. Roscommon. Natura Impact Statement (Energia Reneables ROI Limited, 2022);
- Roscommon County Development Plan 2022-2028 (Roscommon County Council, 2022);
- Westmeath County Development Plan 2021-2027 (Westmeath County Council, 2021);
- National Biodiversity Action Plan (NPWS, 2023);
- Northern and Western Regional Spatial and Economic Strategy 2020-2032 (RSES) (Government of Ireland, 2020).

Detailed ornithological survey was undertaken for the alternative cable routes but not for the route selected as noted in table 5.3 of the NIS. I am satisfied however that sufficient information is available to undertake Appropriate Assessment in this regard. I am satisfied that all aspects of the project which could result in significant effects are considered and assessed in the NIS and mitigation measures designed to avoid or reduce any adverse effects on site integrity are included and assessed for effectiveness.

Submissions/observations

Department of Housing Local Government and Heritage

Concern regarding potential for the flight lines of Whooper Swan utilising the area to intersect/transect with the substation site.

Submission concerns relating to:

Hydrogeological connections from the proposal to groundwater dependent protected habitats, adequacy of expertise available to ABP and methodology in proposal to exclude potential impacts. Four roads Turlough SAC/SPA and Feacle Turlough pNHA and tracked connections with Funshinagh Tubermore springs and Feacle turlough specifically mentioned.

Project splitting with Seven Hills, (reference to NPWS scoping response).

Cumulative effect with pumped water from Lough Funshinagh.

Inadequate baseline including, ornithological studies conducted for the proposal and Seven Hills Wind Farm irreconcilable.

Noise and other impacts on wildlife including named species a number of which are subject to protection.

A broader summary of issues raised submissions is set out in section 4 of the inspector's report.

Summary of Key issues that could give rise to adverse effects (from screening stage):

Downstream Hydrological connectivity to the River Shannon Callows SAC and Middle Shannon Callows SPA with a potential effect by way of a reduction in the quality of Annex I habitats or habitats that support Annex species requires further consideration. The identified potential for hydrogeological connectivity of Ballynamona and Corkip Lough SAC, Lough Ree SAC, Lough Ree SPA and Castlesampson Esker SAC to the project site, and a potential effect by way of a reduction in the quality of Annex I habitats or habitats that support Annex species requires further consideration. Potential ecological connectivity between the River Shannon Callows SAC Lough Ree SPA, River Suck Callows SPA and Middle Shannon Callows SPA and the project site and a potential effect by way of a reduction in the quality of Annex I habitats or habitats that support Annex species by way of creation of a barrier, disturbance, displacement requires further consideration. Also **See Tables 5.13 to 5.18 unmitigated risk of undermining Conservation Objectives for each of the Natura Sites in the NIS.**			
Qualifying Interest features likely to be affected	**Conservation Objectives**	**Potential adverse effects**	**Mitigation measures (summary)** further detail in Section 5.7 and 5.19 of the NIS
River Shannon Callows SAC 000216			
1355 Otter Lutra lutra	maintain the favourable conservation condition	adverse effect on the integrity because of the release of suspended solids and / or other pollutants spread of non-native invasive species disturbance / displacement of otter reduction of prey biomass due to the release of suspended solids and / or other pollutants	Near stream construction works (river Cross HDD crossing) shall be carried out from July to September inclusive only. Detailed mitigation measures during construction including buffers and barriers at the HDD site are set out in S.5.7.1.7 of the NIS. Detailed otter specific mitigations are set out in section 5.7.1.9 of the NIS, including survey buffers and time restrictions as necessary. Best practice construction phase ground and surface water pollution control measures including buffers and barriers for each element of the proposal and specifically for the HDD are set out in the NIS. Operational phase surface water control measures have been designed into the proposal. Industry standard controls are described in CEMP.
91E0 Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion	To maintain the favourable conservation condition of Alluvial forests with Alnus	Adverse effect on the integrity because of the release of suspended	Best practice construction and operational phase ground and surface water pollution and volumetric control measures

incanae, Salicion albae)*	glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)* in River Shannon Callows SAC, w	solids and / or other pollutants spread of non-native invasive species	including buffers and barriers for each element of the proposal and specifically for the HDD are set out in the NIS. An invasive species management plan contains measures set out in the NIS. Industry standard controls are described in CEMP.
8240 Limestone pavements*	To maintain the favourable conservation condition of Limestone pavements		
7230 Alkaline fens	To maintain the favourable conservation condition of Alkaline fens		
6510 Lowland hay meadows (Alopecurus pratensis, Sanguisorba officinalis)	To restore the favourable conservation condition of Lowland hay meadows (Alopecurus pratensis, Sanguisorba officinalis)		
6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae)	To restore the favourable conservation condition of Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae)		
Middle Shannon Callows SPA 004096			
A038 Whooper Swan Cygnus cygnu	To maintain the favourable conservation condition	disturbance / displacement of, barriers to, QI's Ex Situ.	Aspects of the construction with most potential for disturbance at the substation are restricted to April to August Acoustic and visual screening to be utilised at the substation site along with monitoring October to March inclusive
A142 Lapwing Vanellus vanellus	To restore the favourable conservation condition of lapwing	adverse effect on the integrity of Middle Shannon Callows SPA during construction works because of disturbance / displacement of wintering lapwing that use fields in the vicinity and turloughs south and southwest of the proposed substation	
A999 Wetlands	To maintain the favourable conservation condition of wetlands	adverse effect on the integrity of Middle Shannon Callows SPA during construction because of the release of suspended solids and / or other pollutants.	Best practice construction and operational phase ground and surface water pollution control measures including buffers and barriers for each element of the proposal and specifically for the HDD are set out in the NIS. Industry standard controls are described in CEMP
Ballynamona and Corkip Lough SAC 002339			
3180 Turloughs	To restore the favourable conservation condition	Impact on hydrological regime and/or water quality.	Best practice construction and operational phase ground and surface water pollution and volumetric control measures including buffers and barriers for each element of the proposal and specifically for the HDD are set out in the NIS.
91D0 Bog woodland	To restore the favourable conservation condition of Bog woodland	Impact on hydrological regime and/or water quality.	

			Industry standard controls are described in CEMP
Castlesampson Esker SAC 001625			
3180 Turloughs	To restore the favourable conservation condition	Impact on hydrological regime and/or water quality.	Best practice construction and operational phase ground and surface water pollution and volumetric control measures including buffers and barriers for each element of the proposal and specifically for the HDD are set out in the NIS. Industry standard controls are described in CEMP
River Suck Callows SPA 004097			
Whooper Swan (Cygnus cygnus) [A038] w Wigeon (Mareca penelope) [A050] w Lapwing (Vanellus vanellus) [A142] w	To maintain the favourable conservation condition of whooper swan To restore the favourable conservation condition of wigeon and Lapwing.	Barriers limiting the population's access to ecologically important sites outside the SPA will ultimately affect the achievement of targets. Construction disturbance / displacement, ex situ. wintering whooper swan that use the turloughs southwest of the proposed substation and fields along cable route are at risk of disturbance and displacement wintering wigeon that use the turloughs south and southwest of the proposed substation are at risk of disturbance and displacement wintering lapwing that use fields in the vicinity and turloughs south and southwest of the proposed substation are at risk of disturbance and displacement	Aspects of the construction with most potential for disturbance at the substation are restricted to April to August Acoustic and visual screening to be utilised at the substation site along with monitoring October to March inclusive
Lough Ree SAC 000440			
1355 Otter Lutra lutra	To maintain the favourable conservation condition	construction disturbance / displacement.	Near stream construction works (river Cross HDD crossing) shall be carried out from July to September inclusive only. Detailed mitigation measures during construction including

			buffers and barriers at the HDD site are set out in S.5.7.1.7 of the NIS. Detailed otter specific mitigations are set out in section 5.7.1.9 of the NIS, including survey buffers and time restrictions as necessary. Best practice construction phase ground and surface water pollution control measures including buffers and barriers for each element of the proposal and specifically for the HDD are set out in the NIS. Operational phase surface water control measures have been designed into the proposal. Industry standard controls are described in CEMP.
7230 Alkaline fens	To maintain the favourable conservation condition	Impact on hydrological regime and/or water quality.	Best practice construction and operational phase ground and surface water pollution, and volumetric control measures including buffers and barriers for each element of the proposal and specifically for the HDD are set out in the NIS. An invasive species management plan contains measures set out in the NIS. Industry standard controls are described in CEMP.
91E0 Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)*	No conservation objective in published CO's August 2016	adverse effect on the integrity because of the release of suspended solids and / or other pollutants spread of non-native invasive species	
Lough Ree SPA 004064			
A004 Little Grebe Tachybaptus ruficollis A038 Whooper Swan Cygnus cygnus A050 Wigeon Anas penelope A052 Teal Anas crecca A053 Mallard Anas platyrhynchos A056 Shoveler Anas clypeata A061 Tufted Duck Aythya fuligula A125 Coot Fulica atra A142 Lapwing Vanellus vanellus	maintain or restore the favourable conservation condition	Barriers limiting the population's access to ecologically important sites outside the SPA construction disturbance / displacement, ex situ including:. wintering little grebe that use the turloughs south and southwest of the proposed substation are at risk of disturbance and displacement wintering whooper swan that use the turloughs southwest of the proposed substation and fields along cable route	Aspects of the construction with most potential for disturbance at the substation are restricted to April to August Acoustic and visual screening to be utilised at the substation site along with monitoring October to March inclusive

		are at risk of disturbance and displacement wintering wigeon that use the turloughs south and southwest of the proposed substation are at risk of disturbance and displacement wintering lapwing that use fields in the vicinity and the turloughs south and southwest of the proposed substation are at risk of disturbance and displacement	

The above table is based on the documentation and information provided on the file and my observations on sites, I am satisfied that the submitted NIS has identified the relevant attributes and targets of the Qualifying Interests. In particular, I note those relating to ex-situ impacts on QI's of the above referenced SPA's which are also highlighted in a number of submissions set out in section 4 of this report including the submission of the Department of Housing Local Government and Heritage.

I consider that concerns set out in submissions in relation to the potential for impacts on hydrogeology leading to impacts on groundwater dependant terrestrial ecosystems including those protected by Habitats and/or Birds directive have been addressed in the NIS.

Assessment of issues that could give rise to adverse effects in view of conservation objectives:

(i) Water degradation

The release of suspended solids and / or other pollutants into surface and ground waters and volumetric variations arising during construction have potential to result in significant negative impacts on species and habitats subject to conservation objectives where such changes exceed the ranges of tolerance.

Mitigation measures and conditions

I am satisfied that mitigation measures proposed for the protection/maintenance of existing water environment in the NIS and proposed for inclusion by condition in the event of a grant will prevent adverse effects on the integrity of any European sites.

(ii) Disturbance and displacement of mobile species

There is a risk by way of disturbance to Otter during construction of the cable route in the vicinity of the crossing of the Cross River. Limitations in survey detail presented is set out above.

Taking account of the numbers of recorded and observed (Lapwing and Whooper Swans) the potential for disturbance of QI birds during construction presents a potentially significant adverse impact on conservation objectives which requires mitigation.

The potential for the substation to impact on flight paths of Whooper Swans has been excluded as the proposal is considered not to materially alter any potential existing effect from the 110kV overhead. Section 5.3.1.1 of the NIS

Mitigation measures and conditions

Otter:

Mitigation for potential disturbance of Otters is proposed by way of time and season limits to construction in the vicinity of the watercourse along with a programme of ongoing monitoring. Taking account of the proposed scheduling of the HDD I am satisfied with the proposed mitigation.

Wintering Birds in the area of the Substation:

The substantial farmyard near the substation site, occupied by cattle housed for the winter at the time of my site visit is noteworthy in consideration of extant levels of disturbance and habituation to activity. I am satisfied that mitigation of potential disturbance during construction, of ex situ QI species in the vicinity of the substation site by use of barriers is acceptable. However, having observed a flock of Lapwing in fields to the west of the substation, where The Board are minded to grant approval I recommend the barriers be extended to include the Western boundary in addition to the applicant proposed south and southwest boundaries.

Wintering Birds in the area of the HDD crossing of the river Cross

I am satisfied that the potential for disturbance and displacement of the Whooper Swans observed in the vicinity of the Cross River Crossing is mitigated by design in that the applicant proposes to construct this element of the proposal during summer months for reasons of water levels and protection of aquatic species. Where The Board are minded to grant approval I recommend a specific condition be included in this regard to ensure recognition of the extended purpose of this mitigation.

(iii) Spread of invasive species

There is a small risk including on conservation objectives arising as a consequence of the spread of invasive species.

Mitigation measures and conditions

An invasive species management plan is proposed in accordance with best practice which I am satisfied mitigates the risk of invasive species spread.

In-combination effects

I am satisfied that in-combination effects has been assessed adequately in the NIS. A comprehensive list of projects and plans is set out in section 5.4 along with a summary table of interactions at table 5.12 of the submitted NIS.

Submission received expressed particular concern regarding potential impacts of the proposal in combination with the Seven Hills windfarm and Eirgrid Athlone to Lanesborough 110 kV line upgrade and with Quarries from which materials will be sourced for the project.

A submission sets out concerns regarding cumulative impacts with the pumped water from Lough Funshinagh to the Cross River. The development subject of this assessment will result in no change

to the flow regime in the Cross River. The absence of an impact in this regard negates the potential for an impact in culmination with the Lough Funshinagh pumping.

The applicant has demonstrated satisfactorily that no significant residual effects will remain post application of mitigation measures and there is therefore no potential for in-combination effects. I am satisfied that each of the concerns highlighted in submissions have been adequately addressed.

Findings and conclusions

The applicant determined that following implementation of mitigation measures, the construction and operation of the proposed development alone, **or in combination with other plans and projects**, will not adversely affect the integrity of any European site.

Based on the information provided, I am satisfied that adverse effects arising from aspects of the proposed development can be excluded for the European sites considered in the appropriate Assessment. No direct impacts are predicted. Potential indirect impacts would be temporary in nature and mitigation measures are described to prevent qualitative and quantitative impacts on ground and surface water and to prevent disturbance of ex situ species. Monitoring measures are proposed to ensure compliance and effective management of measures. I am satisfied that the mitigation measures proposed to prevent adverse effects have been assessed as effective and can be implemented.

Reasonable scientific doubt

I am satisfied that no reasonable scientific doubt remains as to the absence of adverse effects.

Site Integrity

The proposed development will not affect the attainment of the Conservation objectives of:

- River Shannon Callows SAC 000216,
- Middle Shannon Callows SPA 004096,
- Ballynamona and Corkip Lough SAC 002339,
- Castlesampson Esker SAC 001625,
- River Suck Callows SPA 004097,
- Lough Ree SAC 000440
- Lough Ree SPA 004064.

Adverse effects on site integrity can be excluded and no reasonable scientific doubt remains as to the absence of such effects.

Appropriate Assessment Conclusion: Integrity Test

In screening the need for Appropriate Assessment, it was determined that the proposed development could result in significant effects on River Shannon Callows SAC 000216, Middle Shannon Callows SPA 004096, Ballynamona and Corkip Lough SAC 002339, Castlesampson Esker SAC 001625, River Suck Callows SPA 004097, Lough Ree SAC 000440 and Lough Ree SPA 004064 in view of the conservation objectives of those sites and that Appropriate Assessment under the provisions of S177U was required.

Following an examination, analysis and evaluation of the proposal and receiving environment, the NIS and all associated material submitted including observations, and submissions including by the Department of Housing, Local Government and Heritage, I consider that adverse effects on site integrity of the River Shannon Callows SAC 000216, Middle Shannon Callows SPA 004096, Ballynamona and Corkip Lough SAC 002339, Castlesampson Esker SAC 001625, River Suck Callows SPA 004097, Lough Ree SAC 000440 and Lough Ree SPA 004064 can be excluded in view of the conservation objectives of these sites and that no reasonable scientific doubt remains as to the absence of such effects.

My conclusion is based on the following:

- Detailed assessment of construction and operational impacts.
- Assessment of the immediate and wider receiving environment and components thereof insofar as they relate to and support the functioning of the network of Natura sites towards the achievement of conservation objectives. Including:
    - Consideration of potential qualitative and quantitative impacts on surface and groundwater bodies and the relationship of those waterbodies to species and habitats including conservation objectives of the above referenced Natura sites.
    - Consideration of ex situ impacts on mobile species which are conservation objectives of the above referenced Natura sites including by loss/restriction of access to supporting habitats including by the creation of barriers, disturbance and displacement.
- the proposed development will not affect the attainment of conservation objectives for River Shannon Callows SAC 000216, Middle Shannon Callows SPA 004096, Ballynamona and Corkip Lough SAC 002339, Castlesampson Esker SAC 001625, River Suck Callows SPA

004097, Lough Ree SAC 000440 and Lough Ree SPA 004064 or prevent or delay the restoration of favourable conservation condition as relevant.

- Effectiveness of mitigation measures proposed and amended by conditions recommended for application where The Board are minded to approve the proposal.
- Application of planning conditions to:
  - Extend the requirement for construction phase noise barriers at the substation site to include the western boundary.
  - Restrict construction of the cable route and HDD crossing of the River Cross to the summer for the purpose of mitigating potential impacts on QI winter populations of birds.

Inspector: _____ Date: 25/06/2025