Niamh Hickey

From: Gormley, Cora <Cora.Gormley@rps.tetratech.com>
Sent: Thursday 22 January 2026 17:14
To: SIDS
Cc: Mulryan, Karen; Brennan, Valerie
Subject: Response to Submissions under An Coimisiún Pleanála Ref. ACP-323821-25
Attachments: IE002700 Submissions Response 22.01.2026.pdf

Categories: Niamh

RE: Response to Submissions made to An Coimisiún Pleanála in relation to the proposed Strategic Infrastructure Development Planning Application for Borrisbeg Grid Planning.
An Coimisiún Pleanála Ref. ACP-323821-25

Dear Sir/Madam,

I hope you are well. Tetra Tech RPS, are instructed by the Applicant, Buirios Limited, to submit the attached response to the submissions received on An Coimisiún Pleanála (ACP) Ref. ACP-323821-25 for the Borrisbeg Grid Planning in accordance with correspondence from ACP dated 14th January 2026.

I would greatly appreciate if you could confirm receipt of this response. Please contact me if there are any issues.

Many thanks in advance.

Kind regards,
Cora Gormley

Cora Gormley
Project Planner
West Pier Business Campus,
Dún Laoghaire, Co. Dublin,
A96 N6T7, Ireland
T +353 (0)1 488 2900
E cora.gormley@rps.tetratech.com

West Pier Business
Campus
Dun Laoghaire,
Co. Dublin
A96 N6T7

Tel +353 1 488 29 00

Our Ref: IE002700

Date: 22 January 2026

The Secretary,
An Coimisiún Pleanála.
64 Marlborough Street,
Dublin 1,
D01 V902.
Sent by email to: sids@pleanala.ie

Your Case Ref: VA92.323821

RE: RESPONSE TO SUBMISSIONS MADE ON THE PROPOSED 110KV ELECTRICAL INFRASTRUCTURE AND CONNECTION TO THE NATIONAL GRID AT THE EXISTING 110KV IKERRIN-THURLES OVERHEAD LINE, CO. TIPPERARY.

Dear Sir / Madam,

Tetra Tech RPS, West Pier Business Campus, Dun Laoghaire, Co. Dublin, A96 N6T7, is instructed by the Applicant, Buirios Limited of Lissarda Business Park, Co. Cork, to submit this response to submissions made to An Coimisiún Pleanála (ACP) in relation to the Strategic Infrastructure Development (SID) planning application for a 110kV AIS substation, 110kV underground cabling and ancillary development including a connection to the national grid at the Ikerrin–Thurles 110kV overhead line, in the townlands of Strogue and Clonmore, Co. Tipperary (Case Ref. VA92.323821).

We understand that that the deadline for providing ACP with a response to the submissions / observations received in relation to the application is the 11th of February 2026. It is noted that the planning application includes a robust Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS) and a suite of drawings in support of the Proposed Grid Connection.

A total of 5 no. submissions were received and accepted by ACP in relation to the application for Proposed Grid Connection. In this regard, we refer to the enclosed letter (see Appendix A) received from ACP dated 14th of January 2026. Of the submissions received, 4 no. were made by prescribed bodies namely, Transport Infrastructure Ireland, the Health Service Executive National Environmental Health Service, the Department of Housing, Local Government and Heritage and Tipperary County Council and 1 no. submission was made by a local resident.

This letter sets out the Applicant's full and robust response to each of the submissions received, with reference to the documentation submitted as part of the SID planning application included where relevant. We hope that the response information contained herein will assist ACP in their ongoing consideration of this SID planning application.

1.1 Background to the Proposed Grid Connection

The SID planning application for the Proposed Grid Connection was lodged with ACP on 23 October 2025. The Proposed Grid Connection involves constructing a grid connection and associated electrical infrastructure necessary for connecting the Borrisbeg Renewable Energy Development consented under Case Ref. PA92.318704 to the national transmission system. The Proposed Grid Connection, will consist of the provision of the following:

i. *"A 110 kilovolt (kV) 'loop-in/loop-out' Air-Insulated Switchgear (AIS) electrical substation, including 2 no. single-storey control buildings with staff welfare facilities, underground wastewater storage tank, all associated electrical plant, cabling, equipment and apparatus, and security fencing, within a substation compound with a total footprint of approximately 1.41ha;*

ii. *2.1 kilometre 110kV underground cabling route, with 0.9km following the public road corridor and 1.2km along new proposed access track across agricultural grassland (including joint bays, communication and earth sheath link chambers and all ancillary works along the route);*

iii. *2 no. lattice-type end masts with a height of 16 metres to facilitate connection to the existing 110kV Ikerrin-Thurles overhead electricity transmission line;*

iv. *1 no. temporary construction compound (including offices and staff welfare facilities);*

v. *Vegetation removal and Spoil Management;*

vi. *Site Drainage; and*

vii. *All ancillary works and apparatus.*

A ten-year planning permission is sought."

The consented Borrisbeg Renewable Energy Development comprises 9 No. wind turbines with a tip height of 185 metres with an estimated installed generating capacity of 63MW (herein referred to as the "Consented Wind Farm"). Upon decommissioning of the Consented Wind Farm, the Proposed Grid Connection will remain in situ and form part of the national grid infrastructure.

1.1.1 Site Location

The site is located within a rural setting in north Tipperary, approximately 14.5km south of Roscrea Town and approximately 3.8km northeast of Templemore town centre in Co. Tipperary. The site location context is shown in **Figure 1-1**. The site measures approximately 47.5 hectares and falls within the townlands of Clonmore, Strogue, and Ballycahill.

Land use at the site currently comprises a mix of pastoral agriculture and local roads. The surrounding land use predominantly comprises pastoral agriculture, local roads and commercial and residential within Templemore town. Existing access is the L-7039, L-70391, L7038 in the southeast. Upgrades to the L-70391 local road within the site and upgrade of the junction between the L70391 and the L-7039 will be undertaken as part the Consented Wind Farm. The consented works will result in the widening of 460m of the L-70391 road and resurfacing of the of the entire L-70391 (approx. 1.1km total length). This site entrance will provide operational access for maintenance of the Proposed Grid Connection and the Consented Wind Farm, as well as maintaining the existing public access to involved lands.

Figure 1-1: Site Context Map

1.2 Response to Submissions by Prescribed Bodies

There were 4 no. submissions received from Prescribed Bodies namely; Transport Infrastructure Ireland, the HSE, Tipperary County Council and the Department of Housing, Local Government and Heritage.

1.2.1 Transport Infrastructure Ireland (TII) Submission

TII acknowledge and welcome the contribution the Proposed Grid Connection will have to a low carbon and climate resilient economy, increasing renewable energy generation and enhancing energy security giving effect to National Strategic Outcome no. 8 of the National Planning Framework 'Transition to a Low Carbon and Climate Resilient Society'.

TII provide commentary on the Proposed Grid Connection's compliance with national road network maintenance and safety, and the requirements of official policy '*concerning maintaining the strategic capacity and safety of the national road network in accordance with National Strategic Outcome no. 2 of the National Planning Framework 'Enhanced Regional Accessibility'.*

1.2.1.1 New Access Points on National Roads

Section 28 Ministerial Guidelines published by the Department of Environment, Community and Local Government (DoECLG) entitled 'Spatial Planning and National Roads Guidelines for Planning Authorities, January 2012' (hereafter the 'DoECLG Guidelines') set out policy that seeks to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses (i.e. non-public road access) to national roads, to which speed limits greater than 50 km/h apply.

TII acknowledges that the application documentation submitted in relation to the subject application for a proposed 110kV grid connection and related works indicates no direct access requirements to the national road network.

1.2.1.2 Proposed Development Haul Route

The TII Submission states that:

> *"The applicant/developer should consult with all PPP Companies, MMaRC[1] Contractors and road authorities over which the haul routes traverse to ascertain any operational requirements such as delivery timetabling, etc. and to ensure that the strategic function of the national road network is maintained.*
>
> *TII requests referral of all proposals agreed between the road authorities, PPP Concessions and MMaRC Companies and the applicant impacting on national roads."*

The TII Submission goes on to request that:

> *"Where temporary works within any MMaRC Contract Boundary are required to facilitate the transport of any abnormal loads to site, the applicant/developer shall contact thirdpartyworks@tii.ie in advance, as a works specific Deed of Indemnity will be needed by TII before the works can take place.*
>
> *In the interests of clarification, any proposed works to the national road network to facilitate substation component delivery to site shall comply with TII Publications and shall be subject to Road Safety Audit as appropriate."*

Response:

The Applicant will consult with all PPP Companies, MMaRC Contractors and road authorities over which the Proposed Grid Connection components and materials will traverse to ascertain any operational requirements such as delivery timetabling, etc. and to ensure that the strategic function of the national road network is maintained.

The Applicant agrees to provide copies of all agreements with road authorities, PPP Concessions and MMaRC Companies to TII in advance of deliveries.

Neither temporary accommodation works nor permanent works within any MMaRC Contract Boundary are required to facilitate the substation components and building materials to Site for the Proposed Grid Connection. Moreover, temporary or permanent works are not required to the National Road networks to facilitate the delivery of substation or supporting components or construction materials to the Site.

[1] Motorway Maintenance and Renewal Contracts

1.2.1.3 Structures/Abnormal Loads

The TII Submission requests that any operator who wants to transport a vehicle or load where the weight falls outside the limits allowed by the Road Traffic (Construction Equipment & Use of Vehicles) Regulations 2003, S.I. 5 of 2003, must obtain a permit for its movement from each Local Authority through whose jurisdiction the vehicle shall travel.

In their Submission, TII have requested that full details of the transportation of all Abnormal Loads and all 'Exceptional Abnormal Loads' (EALs) associated with the subject development shall be agreed with all planning and road authorities along all proposed haul routes prior to the commencement of any development.

The TII Submission states that where relevant and required, all structures to be crossed by any 'EAL' will need a full structural assessment by the developer in accordance with TII Publications AM-STR-06048 to verify that they can sustain any 'EAL' load safely and without any damage. Reference should be made to Department of Transport Circular RW18 of 2024 ('Exceptional Abnormal Loads') in that regard.

Response:

The design of the proposed substation will be to the specification of EirGrid at the time of construction (anticipated construction year 2028). It is not anticipated that the substation components will fall into the EAL weight class (above 180 tonnes). However, it is likely that the transformer will be considered an abnormal load (above 46 tonnes) and as such the following will be required:

- A permit for its movement from each Local Authority through whose jurisdiction the vehicle shall travel shall be obtained;
- Full details of the transportation of the Abnormal Load shall be agreed with all planning and road authorities along all proposed haul routes prior to the commencement of any development; and

Although not anticipated, should a component of the Proposed Grid Connection be of a weight class that deems it an EAL, the above points will be required. All structures to be crossed by an EAL will be the subject of a full structural assessment by the project developer in accordance with TII Publications AM-STR-06048 in order to verify that they can sustain an EAL load safely and without any damage.

1.2.1.4 Grid Connection Cabling Route

In their Submission, TII acknowledges that the proposed grid connection cabling route does not interfere or impact in any way upon the national road network.

1.2.1.5 Greenways

The TII Submission recommends that Tipperary County Council liaise with the Applicant regarding any Greenway or Active Travel proposals in the vicinity of the Proposed Grid Connection.

Response:

There are no Greenway or Active Travel proposals in the vicinity of the Proposed Grid Connection. Nonetheless, a Construction Traffic Management Plan will be provided and agreed with the local

authority prior to the commencement of any works. This Plan will mitigate for potential traffic and transportation impacts in the area during the short-term construction phase.

1.2.2 Health Service Executive National Environmental Health Service Submission

The Health Service Executive National Environmental Health Service (hereafter, the 'HSE')Submission provides commentary on the Proposed Grid Connection's likelihood to cause significant effects on the Public or Environmental Health and to provide opinion on the mitigation proposed to prevent such effects.

1.2.2.1 Public Consultation

The HSE recommends that there is engagement with the local community and in particular during the construction phase including a Community Liaison Officer (CLO) where feedback including complaints can be received and acted upon.

Response:

The Applicant has extensive experience in the design, construction and operation of wind farm developments with over 925MW of wind generating capacity in construction or operation throughout the country. Community consultation has been underway since the inception of the Consented Wind Farm (June 2021).

The Applicant has been actively engaging with the local community via the ongoing and continuous presence of a Community Laision Officer (CLO), the issuing of letter drops, the provision of updates via the project website and Public Information Exhibitions (PIE). All correspondence with the local community can be found at: https://borrisbeginfo.com/community-discussion-2/.

Two PIEs were held in the local community for the Consented Wind Farm which included mapping, design, and construction and operational phase detail of the Proposed Grid Connection. It was made known to the community and attendees that the Proposed Gird Connection would be assessed across the EIAR and NIS within the application for the Consented Wind Farm; however these elements would be applied for separately as required under Section 182A of the Planning and Development Act 2000, as amended. Details of the information displayed at the PIEs can be found at: https://borrisbeginfo.com/community-discussion-2-2/ and https://borrisbeginfo.com/community-discussion-2-2-2/.

A letter drop was undertaken to local residences (383 no. residences in total) in May 2025 by the CLO to inform the community that the application for the Proposed Grid Connection would be submitted within 3 months of that correspondence. The letter confirmed that the proposed works remained unchanged from what was assessed in the application for the Consented Wind Farm. A copy of this letter can be found at https://borrisbeginfo.com/wp-content/uploads/2025/05/May-2025-Letter-to-Residents.pdf.

The letter requested that should any resident have any concerns or comments, to please contact via phone number, email address and website address provided. The letter included a map of the Proposed Grid Connection works in relation to the Consented Wind Farm. A copy of this map can be found at https://borrisbeginfo.com/wp-content/uploads/2025/05/Grid-Connection.pdf.

Communication between the public and the CLO has remained open since June 2021 to date.

Information regarding the proposed construction phase will be communicated to all residences located within a c.2km radius of the Consented Wind Farm via a letter drop prior to the

commencement of construction. The information provided will include details of the proposed traffic management plans along the L-7039, R433 and L-7038, refer to the supporting CEMP section 3.4.1.

Local residents will be kept informed of the proposed working schedule, where appropriate, including the times and duration of any abnormally noisy activity that may cause concern.

The CLO will remain contactable throughout the construction and operational phase and will ensure that any complaints logged are raised with the Site Manager and acted upon immediately.

1.2.2.2 Air Quality and Climate

The HSE Submission states that Climate is not addressed in the Population and Human Health chapter of the EIAR, however, it acknowledges that climate and emissions to air are addressed in the Air Quality and Climate Chapters later in the EIAR.

The HSE recommends that the construction phase mitigation measures described under Section 9.4.2,Chapter 9 Air Quality, in relation to air quality are set as minimum conditions of planning if permission is granted. The HSE Submission also includes the following: *'Additional measures not listed may include a wheel wash for HGVs exiting the site, covering of loads and covering of soil stockpiles that may be on site.'*

The HSE recommends that all mitigation measures detailed in Section 10.5 of the Chapter 10 of the EIAR are employed at a minimum in relation to Climate. The HSE also recommends that vehicles, plant and machinery which do not use fossil fuels are considered for the construction phase, where possible.

Response:

The issues raised by the HSE have been fully addressed within the EIAR.

- The provision of a wheel wash is covered in the design of the Proposed Grid Connection. Refer to MM15 of Table 16-1 in Chapter 16: Schedule of Environmental Commitments of the EIAR.
- The covering of imported loads is included as a mitigation measure within the EIAR, refer to MM70 of Table 16-1 in Chapter 16: Schedule of Environmental Commitments.
- The covering of stockpiles is included as a mitigation measure within the EIAR, refer to MM55 of Table 16-1 in Chapter 16: Schedule of Environmental Commitments.
- MM69 of Table 16-1 in Chapter 16: Schedule of Environmental Commitments of the EIAR outlines provisions to minimise exhaust emissions during the construction phase. The use of vehicles, plant and machinery that do not consume fossil fuels will be considered during the construction phase, where practical.

1.2.2.3 Noise

The HSE Submission recommends that all mitigation measures detailed in Section 11.5 of Chapter 11 of the EIAR are implemented during the construction phase. The HSE Submission also recommends that work hours on a Saturday should cease at 1400hrs, with no work taking place on Sundays and public holidays.

Response:

The Applicant agrees to cease works at 1400 hrs on Saturdays, with no works taking place on Sundays or public holidays and will accept these hours as a condition of any consent that ACP may issue. However, as noted in Section 3.6.1 of Chapter 3 Development Description, to ensure that optimal use is made of good weather periods or at critical periods within the programme, it could be necessary on occasion to work outside of these hours. Any such out of hours working will be agreed in advance with the Local Authority.

1.2.3 Department of Housing, Local Government and Heritage (DHLGH) Submission

The Submission made by the Development Applications Unit of the DHLGH provides commentary relating to the potential to encounter unknown subsurface archaeology and provides a list of preferred mitigation and monitoring measures to minimise the potential for likely significant effects.

1.2.3.1 Mitigation and Monitoring Measures

The DHLGH Submission recommends that all measures listed in Chapter 12 of the EIAR are implemented during the construction phase. They further add that the following mitigation measures should be included:

1. *'All mitigation measures in relation to archaeology and cultural heritage as set out in Chapter 12 of the EIAR (Tobar Archaeological Services; date 15 September 2025) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order,*
2. *The developer shall engage a suitably qualified archaeologist (licensed under the National Monuments Acts) to carry out pre-development archaeological testing in all greenfield areas of the development site and to submit an archaeological impact assessment report for the written agreement of the planning authority, following consultation with the Department, in advance of any site preparation works or* groundworks, including site investigation works/topsoil stripping/site clearance *and/or construction works*
    a. *The report shall include an archaeological impact statement and mitigation strategy. Where archaeological material is shown to be present, avoidance preservation in-situ, preservation by record (archaeological excavation) and/or monitoring may be required.*
    b. *Any further archaeological mitigation requirements specified by the planning authority, following consultation with the Department, shall be complied with by the developer.*
    c. *No site preparation and/or construction works shall be carried out on site until the archaeologist's report has been submitted to and approval to proceed is agreed in writing with the planning authority.*
3. *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 12 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.*

4. *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,*
5. *All resulting and associated archaeological costs shall be borne by the developer.'*

Response:

It should be noted that items 1,2 and 4 detailed above are included in the EIAR for the Proposed Grid Connection in Section 12.8.3.4.2 of Chapter 12 Cultural Heritage and reiterated in the CEMP and chapter 16 Schedule of Environmental Commitments (MM76, MM77 and MX14). Items 3 and 5 above are standard procedures which are undertaken the Applicant in any event; however, the Applicant is happy to haves these items explicitly included as conditions of consent.

1.2.4 Tipperary County Council Submission

Section 1, 2 and 3 of the Tipperary County Council's (TCC) Submission provides a summary the Consented Wind Farm and the Proposed Grid Connection. Section 4 of the TCC's Submission dated 17 December 2025 states:

> *"District Engineer: There is no objection to the proposal. The report from the District Engineer notes that the applicant has included all recommended mitigation measures as part of the application."*

Section 5 sets out TCC's considerations in relation to the Proposed Grid Connection; specifically national, regional and local policies pertaining to climate action.

The TCC Submission states that in relation to the NIS submitted in support of the planning application for the Proposed Grid Connection, TCC refer back to the NIS submitted for the Consented Wind Farm development (Case Ref. PA92.318704) under Section 37E of the Planning and Development Act 2000, as amended, which assessed both the Consented Wind Farm and the proposed substation and underground cabling route. The TCC Submission notes that based on the information provided, it considered that "*the proposed development would not lead to detrimental effect on any Natura Site.*"

In their Submission, TCC state that in relation to the EIAR submitted as part of the planning application for the Consented Wind Farm under Section 37E of the Planning and Development Act 2000, as amended, this report included an assessment of the proposed substation and underground cable. TCC conclude that based on the information provided in the EIAR, the Planning Authority considers that the "*proposed development may not result in significant impacts on the Environment.*"

TCC go on to further state that the "*Planning Authority considers the proposed development as enabling works to an already permitted development and so would view the principle of the same as acceptable.*"

TCC provides 8 recommended conditions should the Proposed Grid Connection receive a grant of permission by ACP.

Response:

The Applicant welcomes the positive report received on the file from TCC and will have no difficulty with the recommended conditions provided by the Planning Authority should they be included in a consent issued by ACP.

1.3 Response to Submission by Local Resident

In addition to the 4 no. Submissions by Prescribed Bodies, a singular Submission was made by a local resident, namely Katie O Sullivan. Responses to this local resident's submission are addressed in detail under the following headings:

- Residential Amenity (including Noise, Visuals and Lighting).
- Rural Roads, Access, Safety and Emergency Response
- Flood Risk
- Planning Policy and Prejudice to Residential Development
- Agricultural Impacts
- Ecology
- Cumulative Impact

1.3.1.1 Residential Amenity (including Noise, Visuals and Lighting).

The Submission expresses concerns in relation to permanent background noise from the Proposed Grid Connection, lighting and visual obtrusion. The observer states that there are very low background noise levels in the area and present noise levels in the area are mainly caused by wind passing through vegetation, natural wildlife sounds, and minimal traffic outside of normal farming activity noise.

Response:

As discussed in Section 4.5.1.14 of Chapter 4 Population and Human Health, the impact on residential amenity is derived from an overall judgement of the combination of impacts due to visual amenity, noise, traffic, dust and general disturbance. In the context of the Proposed Grid Connection, impacts from noise, dust and traffic may generally occur during the construction phase while visual intrusion is generally considered for the operational phase. With the implementation of the mitigation measures listed in Sections 4.7.3.2.2, 4.7.3.4.2 and 4.7.3.5.2 of Chapter 4 pertaining to dust, noise and traffic, respectively, the effects are considered to be short term only and ranging from Slight to Imperceptible. Furthermore, background noise monitoring was undertaken for the Proposed Grid Connection and the impact assessment concluded that with the addition of a substation at the Site, noise levels are not predicted to increase at any Noise Sensitive Location (NSL). As demonstrated in Chapter 13 Landscape and Visual Impact, the landscape and visual effects from the proposed substation compound are assessed as not significant. The substation compound will be screened via both existing vegetation and a proposed berm of up to 4m which will naturally reseed overtime.

These factors were considered throughout the iterative design process and with the various mitigation measures listed in Chapter 9 Air Quality, Chapter 11 Noise and Vibration, Chapter 13 Landscape and Visual Impact and Chapter 14 Material Assets, impacts on residential amenity from noise and dust emissions, traffic disruption and visual effects are assessed as Not Significant.

Lighting will be in place during the construction phase and will be used only when needed. Lighting in the operational phase will only be used when required for maintenance purposes.

Detailed mitigation measures are included for the control of artificial lighting during the construction and operational phase of the Proposed Grid Connection and Consented Wind Farm, see MM74 and MM79 in Appendix A of the CEMP (Appendix 3-2 of the EIAR). Whilst these measures are

primarily to mitigate impacts on bats, they will also mitigate any unlikely potential impacts on residential amenity caused by artificial lighting.

1.3.1.2 Rural Roads, Access, Safety and Emergency Response

The observer comments that the local roads are used for vehicles, livestock movements and pedestrians and the presence of heavy construction traffic and abnormal loads would be incompatible with this shared rural function. The observer also states that heavy vehicles on these roads would impede emergency vehicles should they be required in the area.

Response:

As detailed in Chapter 14 of the EIAR which assesses Traffic and Transport, the construction phase of the Proposed Grid Connection (and the Consented Wind Farm), will include a Construction Traffic Management Plan which will detail road closure and diversion requirements for the construction phase, all of which will be agreed with Tipperary County Council prior to the commencement of the construction phase. It is assessed in the EIAR that there will be No Significant effects to local traffic and transport as a result of diversions incurred during the construction of the Proposed Grid Connection underground cabling route. Furthermore, the route selected for the Proposed Grid Connection underground cabling route is the shortest route possible along the public road network with suitable diversion routes available when required, and the proposed use of off road sections will result in the minimum impact on the public road network.

Section 6 'Emergency Response Plan' (ERP) of the supporting CEMP provides details of procedures to be adopted in the event of an emergency, including construction traffic related emergencies. This document will be updated by the contractor/Project Supervisor Construction Stage (PSCS) and suppliers as the project progresses. The CEMP sets out the chain of command during an emergency response i.e. who is responsible for coordinating the response. All health and safety measures as detailed across the EIAR and CEMP will be strictly adhered to and in the unlikely event that an emergency occurs on site, the procedures within the Emergency Response Plan will be activated and followed explicitly.

As noted previously, the project CLO will remain available to the local community to ensure that any potential issues around pedestrian and livestock access are communicated to the contractor and ensure that the needs of the local community are accommodated.

1.3.1.3 Flood Risk

The Submission comments that flood risk, drainage, and potential pollution pathways (including sediment-laden runoff, hydrocarbons and construction materials) require robust assessment and demonstration of safety over the lifetime of the development and that the application does not adequately address these issues for a sensitive receiving environment.

Response:

Flood Risk

A site specific robust and comprehensive Flood Risk Assessment (Appendix 8-1 Flood Risk Assessment) was undertaken for the Proposed Grid Connection. The Assessment was undertaken following comprehensive desktop studies, on-site walkovers, existing site drainage surveys, Stage

3 Flood Modelling (for both the Consented Wind Farm Site and the Proposed Grid Connection Site) and a Justification Test. The Flood Risk Assessment concludes:

i. *The design of the Proposed Grid Connection has undergone an iterative process which ensured that the sensitive elements of the development i.e. the proposed 110kV substation and temporary construction compound are outside of the modelled flood zones.*

ii. *No increase in flood risk to people, property, the economy or the environment during extreme flood events as a result of the Proposed Grid Connection is predicted due to the appropriate design measures which will result in imperceptible upstream and downstream effects.*

Drainage

A detailed, design specific drainage design which includes settlement ponds and interceptor drains has been developed for the Proposed Grid Connection, refer to Section 8.4.1 of Chapter 8 Hydrology and Hydrogeology. Pre-emptive site drainage management i.e. weather monitoring will be undertaken to ensure no earthworks take place during periods of forecasted heavy rain/storms. it should also be noted that the detailed drainage design included an allowance for Climate Change.

Potential Pollution Pathways

Section 8.5.2.4 of Chapter 8 Hydrology and Hydrogeology details proven and effective measures to mitigate the risk of hydrocarbon release and will break the pathway between the potential sediment sources and watercourse receptors. The residual effects are assessed as negative, imperceptible, indirect, short term, unlikely effect on local groundwater and surface water quality. These proven mitigation measures are also detailed in the supporting CEMP (MM52) and Chapter 16 Schedule of Environmental Commitments.

Section 8.5.2.6 of Chapter 8 Hydrology and Hydrogeology includes proven and effective mitigation measures to prevent the release of cement based products and concrete truck wash water and will break the pathway between the potential source and each receptor. These measures are also detailed in the supporting CEMP (MM63) and Chapter 16 Schedule of Environmental Commitments.

It is clearly and robustly demonstrated through the infrastructure siting, detailed drainage design, site specific Flood Risk Assessment and suite of mitigation measures, that flood risk, drainage, and potential pollution pathways have been robustly considered, assessed and mitigated for construction and operational phases of the Proposed Grid Connection.

1.3.1.4 Planning Policy and Prejudice to Residential Development

The Submission comments that the Proposed Grid Connection would preclude future rural residential planning applications due to the proximity to 'industrial electrical infrastructure.' The submission also states that the proposal materially contravenes the Tipperary County Development Plan 2022-2028, the National Planning Framework (NPF), and the National Landscape Strategy, all of which aim to support rural communities.

Response:

The Proposed Grid Connection does not preclude the application for, or development of one off rural housing in the area. There are no mandatory setbacks from substations for residential development and therefore the argument that a planning authority would reject an application for a

new dwelling due to its location across the road from the proposed substation is unsubstantiated. It should be noted that there are several examples of existing substations operating successfully in close proximity to dwellings, for example the existing substation in Templemore town is located on Mary Street within a residential area, surrounded by houses, commercial businesses and directly opposite a national school, demonstrating that all types of development can coexist in proximity to substations. Furthermore, both the Ikerrin 110kV substation and Thurles 110kV substations are located in rural settings with one off rural dwellings in close proximity. As such, the Applicant would reject the argument that the introduction of the Proposed Grid Connection in close proximity to these lands would fundamentally alter their planning context.

As demonstrated within the EIAR and Planning Report, the Proposed Grid Connection is compliant with national, regional and local policy by indirectly supporting our obligations to increase renewable energy generation, enhance energy security and achieve a low carbon transition and climate resilient economy. Furthermore, TCC considered national, regional and local policy in their review of the Proposed Grid Connection and are broadly in support of its development, refer to Section 1.2.4 above.

1.3.1.5 Agricultural Impacts

The Submission comments that the Proposed Grid Connection would impact on agricultural activity, livestock welfare and animal management practise in the area, citing the incompatibility of noise and lighting with farming realities.

Response:

As stated above in Section 1.3.1.4, substations coexist in rural areas across the State and farming practises continue daily around them with no adverse effects on agriculture or livestock reported. As discussed in Section 1.2.1, a Construction Traffic Management Plan will be in place on the local roads which will facilitate and manage the movement of local traffic, construction traffic, farming traffic and livestock in the area for the short-term construction phase. During the operational phase, traffic movements will be 1-2 daily visits in light goods vehicles and will be imperceptible from local traffic.

As discussed in Section 1.3.1.1, the addition of a substation will not increase noise levels from the current existing baseline and there will be no ongoing operational lighting that would impact on agriculture or livestock.

1.3.1.6 Ecology

The local resident's Submission states that hedgerows, pastures, boundaries and mammals may be impacted by the Proposed Grid Connection.

Response:

Detailed habitat, mammal and botanical surveys were undertaken at the Site as part of the Proposed Grid Connection application and the Consented Wind Farm.

The substation and end mast fields comprise agricultural grassland (GA1) while 2.1km the grid cable route will be laid within 1.2km of agricultural grassland (GA1) and 0.9km of built land (BL3), with little to no vegetation present here save for common daisy and grass species growing in the middle of the road.

No otter signs, couches or holts, badger signs, hairs, latrines or setts, trees with potential bat roost features, amphibians or reptiles, protected or notable terrestrial invertebrates or signs of or significant potential for other protected mammals were reordered during the ecology surveys undertaken in May 2025 to inform the Proposed Grid Connection impact assessment. In addition, the habitats recorded are unlikely to support any protected/notable species or notable assemblage of invertebrate species. No protected or notable bird species or assemblage of species or evidence of breeding was encountered during the ecological walkover surveys in May 2025.

As part of the Proposed Grid Connection, it is intended to restore the segments of hedgerow that will be removed to facilitate the underground grid connection cable. These restored hedgerows will be monitored following the main growing season (i.e., in September) in a given year for the first five years of growth.

Included as part of the Consented Wind Farm design, is the commitment to provide a biodiversity net gain through the planting of over 3km of hedgerow/treeline within the wind farm site. Should the Proposed Grid Connection not receive a grant, the Consented Wind Farm will not be constructed and therefore the net gain in these habitats will not be realised.

Likewise, the Consented Wind Farm includes a commitment to plant approximately 1.8 hectares of natural woodland along a section of the Eastwood River within the adjacent wind farm site. This replanting effort exceeds the area of habitat loss and will be preserved as a Woodland Conservation Area for the duration of the Consented Wind Farm's operation. This initiative is expected to yield a long-term, slight positive impact on biodiversity.

In addition to the above, the Consented Wind Farm includes a commitment to restore the pattern, profile, and dimensions of a 340m segment of the Eastwood River, which will also contribute to a long-term, slight improvement in local water quality and aquatic species. Should the Proposed Grid Connection not receive a grant, the Consented Wind Farm will not be constructed and therefore the river restoration project and subsequent improvement to water quality and aquatic ecology will not occur.

1.3.1.7 Cumulative Impact

The observer comments that the Proposed Grid Connection "would contribute to cumulative industrialisation and planning creep, resulting in gradual erosion of rural character and amenity contrary to proper planning and sustainable development."

Response:

The Proposed Grid Connection has been cumulatively assessed across the EIAR and NIS with the Consented Wind Farm, and all other proposed, consented and operational projects and/or plans within the cumulative study area. Please refer to Chapter 15 and Appendix 15.1 of the EIAR which assesses the cumulative impact for further details. The Cumulative Impact Assessment completed as part of the EIAR concluded that there is no significant environmental effects with other projects and/or plans within the study area. Future unknown developments would have to be assessed alone and cumulatively with other projects and/or plans by the Competent Authority on their own merit for compliance with proper planning and sustainable development.

1.4 Conclusion

The Proposed Grid Connection has been designed with regard for its surrounding context and in particular its proximity to existing residential neighbourhoods. Statutory and non-statutory consultation has been undertaken with the local community and with TCC and other stakeholders to ensure concerns were fully addressed in the EIAR for the Proposed Grid Connection.

The documentation submitted as part of the planning application has fully assessed the potential impacts that the Proposed Grid Connection may have in terms of, inter alia, air quality, noise, vibration, traffic, transportation, health and safety, visual impact and cumulative impact. The application documentation also includes a comprehensive NIS and CEMP. In this regard, it is submitted that concerns raised in the submissions to ACP are fully addressed in the planning application documentation, with relevant sections referenced in this Response.

Having regard to the key points set out in this response to observations, it is respectfully requested that ACP consider the relevant international, national, regional and local planning context that applies to the Proposed Grid Connection and its role in indirectly supporting our obligations to increase renewable energy generation, enhance energy security and achieve a low carbon transition and climate resilient economy. The Proposed Grid Connection will indirectly contribute to the target of generating 9GW of renewable energy from onshore wind, and reducing greenhouse gas emissions by 80% by 2030, as set out in the Climate Action Plan 2025.

The Applicant is fully committed to undertaking ongoing consultation with the local community, TCC and other key stakeholders to agree various details of the subject proposals prior to the commencement of development and throughout all development phases.

Therefore, it is respectfully requested that An Coimisiún Pleanála grant planning permission for the Proposed Grid Connection in accordance with the provisions of proper planning and sustainable development.

Yours faithfully,

Karen Mulryan

Karen Mulrayan
Principal Scientist
karen.mulryan@rps.tetratech.com
+353 (1) 488 2900