Planning Statement

For Development at Rathmorrissy and Pollnagroagh, (Townlands), Athenry, Co. Galway

on behalf of Bord Gáis Energy Limited

February 2026

McCutcheon Halley
CHARTERED PLANNING CONSULTANTS

McCutcheon Halley
CHARTERED PLANNING CONSULTANTS

Document Control Sheet

Client	Bord Gáis Energy Limited	
Project Title	Cashla Peaker Plant	
Document Title	Planning Statement	
Document Comprises	**Volumes**	1
	Pages (Including Cover)	95
	Appendices	3
Prepared by	Muireann Carroll	
Checked by	Paula Galvin	
Office of Issue	Dublin	
Document Information	**Revision**	1
	Status	Final
	Issue Date	February 2026

www.mhplanning.ie

CORK
6 Joyce House
Barrack Square
Ballincollig
Cork
P31 YX97
T. +353 (0)21 420 8710

DUBLIN
Kreston House
Arran Court
Arran Quay
Dublin 7
D07 K271
T. +353 (0)1 804 4477

Contents

1. Introduction

1.1 Overview of Report

McCutcheon Halley Planning Consultants (MHP) have prepared this planning statement on behalf of Bord Gáis Energy Limited (the Applicant). This planning statement has been prepared to accompany and support an application being submitted to An Coimisiún Pleanála (the Commission[1]) pursuant to section 37E of the Planning and Development Act 2000, as amended (PDA 2000) for the proposed development of a natural gas-fuelled electricity generation plant (named 'Cashla Peaker Plant'), referred to as the 'Proposed Development' hereafter. It is noted that the Proposed Development will operate primarily on natural gas however it will be designed with dual-fuel capability, allowing the use of low sulphur diesel on a limited basis for emergency or back-up operation where required to ensure security of electricity supply. The Proposed Development also includes an above ground installation (AGI) and associated infrastructure and is located within the townlands of Rathmorrissy and Pollnagroagh, Athenry, Co. Galway.

The purpose of the Proposed Development is to enhance the capacity and resilience of the national grid by providing additional generation at times when renewable energy production is insufficient to meet demand. The proposed development plays an important enabling role in Ireland's transition to a low-carbon electricity system. As renewable energy generation continues to increase, flexible and responsive electricity infrastructure is required to maintain security of supply during periods when renewable output is low. The Proposed Development is specifically designed to perform this supporting role, facilitating the continued expansion of renewable energy while ensuring a stable and reliable electricity system for homes, businesses and critical services.

Operating as a 'peaking plant' with minimal annual use (i.e. anticipated to be in the order of 100 hours per annum though actual dispatch will be determined by system requirements), the Proposed Development will provide backup or 'flexible' generation during critical periods when renewable energy sources are not sufficient to meet demand. For the avoidance of doubt, the term 'peaker', or 'peaking', in this context refers to a dispatchable, fast-start facility operating intermittently to support system adequacy during periods of high demand and low renewable output. A detailed description of the proposed development is set out in Section 2 of this planning statement.

The purpose of this planning statement is to present a clear and structured rationale for the proposed development, to assess the proposal in the context of relevant European, national, regional, and local planning policy,

[1] An Bord Pleanála (the Board) officially changed its name to An Coimisiún Pleanála (the Commission) in June 2025 following the enactment of Part 17 of the Planning and Development Act, 2024.

and to demonstrate that the development is consistent with and supported by the applicable planning and energy policy framework

It is noted that, to operate, the proposed development requires a 220kV substation and grid connection to connect into the existing Cashla 220kV Substation. The substation will be located within the proposed development site boundary. The grid connection will follow the L7109, L71093, L7108 and L3103 roads, across the townlands of Rathmorrissy, Pollnagroagh, Moanbaun, Castlelambert, Knocknacreeva, Caraunduff, Caherbriskaun, Lisheenkyle East, Barrettspark, Cashla, Athenry, Co. Galway. As these elements of the project constitute electricity transmission infrastructure, as is required by Irish planning law, a separate planning application under Section 182B of the PDA 2000 will be submitted to An Coimisiún Pleanála (ACP) for approval (refer to Section 1.3 of this planning report for further detail on the application processes). The Proposed Development will also require a connection to the gas transmission infrastructure to operate. This connection will be subject of a separate consent under s39A of the Gas Act 1976 (as amended)[the Gas Act] and will be located within the townland of Rathmorrissy, Athenry, Co. Galway.

This application for permission is accompanied by an Environmental Impact Assessment Report (EIAR), and a Natura Impact Statement (NIS). As such, environmental matters, such as traffic, noise, air quality, biodiversity, water, and landscape are comprehensively assessed within those supporting reports. To avoid unnecessary duplication, this Planning Statement does not seek to replicate that material but instead refers to the EIAR or the NIS where appropriate, focusing primarily on the planning and policy framework underpinning the proposed development.

1.2 Applicant Details

Bord Gáis Energy Limited (BGE) is the applicant for this planning application.

The company was established in 2009 following the separation of Bord Gáis Éireann's roles of gas network operator and energy supplier. In 2014, Bord Gáis Energy became part of the Centrica plc Group. Centrica is a leading international energy services and solutions provider. Centrica supplies international energy and services to 26.2 million customer accounts mainly in Ireland, the UK and North America through its brands including BGE, British Gas and others.

As a vertically integrated energy company, Bord Gáis Energy is investing for the future in innovation energy projects and assets, to support a secure and stable supply of energy in Ireland; and, using their market leading position to support their customers to decarbonise their homes, farms and businesses.

BGE is fundamentally repurposing its business to become a leading green energy business, working towards energising a greener, fairer future. They are committed to achieving net zero by 2045, and to helping our customers to get to net zero by 2050. This involves significant investment. The company is underpinned by its parent company, Centrica, who has committed to investing £4 billion globally (with €1 billion in Ireland) over the next five years

in the energy transition. This transition will see the company move from 500 megawatts of green and energy transition investments to 3,200 megawatts over the next six years, and in the process lead Ireland's energy transition agenda.

Bord Gáis Energy will continue to be a major player in ensuring Ireland's security of supply as the State transitions to greener energy. They operate the 445 MW Combined Cycle Gas Turbine (CCGT) power plant in Whitegate, County Cork and is currently finalising the development of two new power plants, one within the Monksland Industrial Estate in Athlone, County Roscommon and the other at Profile Park, Dublin 22 involving investment of over €300 million.

In September 2024, Bord Gáis Energy entered Ireland's Single Electricity Market Operator (SEMO) T-4 capacity auction for the 2027/2028 delivery year and secured a 10-year capacity contract from October 2028 to September 2038 for the proposed development. The award of this capacity contract confirms the identified need for the project within the electricity system and reflects its role in supporting security of supply during periods of peak demand, in accordance with the objectives of national energy and climate policy.

Capacity contracts are time-limited market instruments and are awarded for a maximum duration of ten years. The proposed operational life of the development, which is limited to no later than 31 December 2050, is a separate planning consideration and reflects alignment with national climate action policy and long-term decarbonisation objectives. There is therefore no inconsistency between the duration of the capacity contract and the proposed time-limited operational life of the development.

1.3 Background and Legal Framework

1.3.1 Overview

Under the PDA 2000, Strategic Infrastructure Development (SID) is regulated by Sections 37A – 37J, which set out the processes for applications to be made directly to the Commission where a proposed development falls within a project class specified in the Seventh Schedule. The relevance of these provisions to the proposed development are set out in further detail in section 1.3.2 below.

Section 182A of the PDA 2000 sets out that where a person intends to carry out development comprising or for the purposes of electricity transmission infrastructure[2], an application shall be prepared and submitted to the

[2] Section 182A(9) sets out that ""*transmission", in relation to electricity, shall be construed in accordance with section 2(1) of the Electricity Regulation Act 1999 but, for the purposes of this section, the foregoing expression, in relation to electricity, shall also be construed as meaning the transport of electricity by means of—*

(a) *a high voltage line where the voltage would be 110 kilovolts or more; or*

(b) *an interconnector, whether ownership of the interconnector will be vested in the undertaker or not."*

Commission for approval of the development under Section 182B. The relevance of these provisions to the project are set out in further detail in section 1.3.4 below.

1.3.2 Strategic Infrastructure Development

Section 37B of the PDA 2000 requires a person proposing to apply for permission for any development specified in the Seventh Schedule of the PDA 2000 to enter into statutory pre-application consultation with the Commission. The Seventh Schedule includes the following project class:

Energy Infrastructure

(1) Development comprising or for the purposes of any of the following:

…

- An industrial installation for the production of electricity, steam or hot water with a heat output of 300 megawatts or more…

An industrial installation for the production of electricity is a system of non-domestic equipment, infrastructure and processes that are utilised to generate electrical energy. The Proposed Development is a non-domestic arrangement of equipment, infrastructure and processes that are used for the production of electrical energy. Therefore, the Proposed Development is such an industrial installation.

A heat output of 300 megawatts or more is heat energy of 300 megawatts or more produced at the end of a process with no further conversions of this heat energy thereafter. A heat output of 300 megawatts or more does not discriminate between the useful or non-useful use of the heat energy at the end of the process. The Proposed Development's process will result in the output of more than 300 megawatts of electrical energy as well as more than 500 megawatts of heat which is output through the plant's exhaust stack with no further conversion of this to heat energy.

The Proposed Development is therefore considered to be an industrial installation for the production of electricity, steam or hot water with a heat output of 300 megawatts or more.

In addition to the aforementioned project class, the Proposed Development is also considered to fall under the following project class listed under 'Energy Infrastructure' in the Seventh Schedule:

- *A thermal power station or other combustion installation with a total energy output of 300 megawatts or more.*

A thermal power station is an installation that converts heat energy obtained from various original sources into electrical energy. The Proposed Development's gas turbine and generator will convert heat energy obtained from the combustion of gaseous or liquid fuel into electrical energy.

The Proposed Development is capable of generating electricity at more than 300 megawatts of electrical energy. Therefore, the Proposed Development is considered to have a total energy output of 300 megawatts or more.

The Proposed Development is therefore considered to be a thermal power station with a total energy output of 300 megawatts or more.

The Proposed Development therefore constitutes Seventh Schedule development for the purposes of Section 37B of the Planning and Development Act 2000, as amended, and is subject to statutory pre-application consultation with the Commission.

1.3.3 S.37B Pre-Application Consultation (Case Ref: ABP-320975-24)

The applicant submitted a request on the 24th of October 2024 to enter into pre-application consultation with the Commission in relation to the proposed development.

Two meetings were held with the Commission as part of the pre-application consultation process with the first meeting held on the 20th of January 2025 and the second meeting held on the 28th of May 2025. The pre-application consultation process was formally closed by the Commission on the 26th of August 2025. A notice was served under Section 37B(4)(a) setting out that the Commission is of the opinion that the proposed development falls within the scope of paragraphs 37A(2)(a) and (b) of the Act and that the proposed development would be strategic infrastructure within the meaning of Section 37A of the PDA 2000. The applicant was instructed that an application for permission for the proposed development must be made directly to the Commission under Section 37E of the Act.

A copy of the Direction, the Inspector's Report, the Written Record of Meeting held on 20th of January 2025 and the Written Record of the Meeting held on the 28th of May 2025 in relation to the pre-application consultation held under Case Ref: ABP-320975-24 can be found enclosed in **Appendix 1** of this planning statement.

1.3.4 Electricity Transmission Infrastructure

Certain electricity transmission infrastructure developments fall under the provisions of Section 182A of the PDA 2000 and as such an application is required to be submitted directly to An Coimisiún Pleanála under Section 182B for such development.

Section 182E of the PDA 2000 requires that an applicant who proposes to apply for approval under Section 182B shall enter into consultation with the Commission in relation to the proposed development before making the application.

In line with the provisions set out in relation to electricity transmission infrastructure under the PDA 2000, the applicant submitted a request on the 5th of November 2025 to enter into pre-application consultation with the Commission in relation to the 220kV Substation and 220kV Grid Connection elements of the project (Case Ref: ACP-323874-25).

A notice was served to the applicant under Section S182E on the 9th February 2026 that the Commission is of the opinion that the proposed development (subject of the consultation under S182E) falls within the scope of paragraphs S182A of the PDA 2000. The applicant was instructed that an application for

permission for the proposed development must be made directly to the Commission under section 182A(1) of the Act.

On the basis of the opinion received from the Commission, a separate planning application will be lodged to the Commission shortly for this element of the project.

1.3.5 Environmental Impact Assessment

Under Section 37E of the PDA 2000, an application for permission for development in respect of which a notice has been served under section 37B(4)(a) shall be made to the Commission and shall be accompanied by an Environmental Impact Assessment Report (EIAR) in respect of the proposed development.

As set out in section 1.3.3, a notice has been served under section 37B(4)(a) and as such an EIAR has been prepared and can be found enclosed with this planning application.

The proposed development forms part of a wider overall project, which also includes the associated connection to the national electricity grid and a connection to the mains gas transmission network. While separate planning applications are required for the generation plant and the grid connection infrastructure in accordance with the PDA 2000, and a separate consent for the gas transmission infrastructure in accordance with the Gas Act, the project has been assessed as a single project. Accordingly, the accompanying EIAR and the NIS assess the full project in its entirety, including both the Proposed Development, subject of this application, and the associated grid and gas infrastructure. Further detail on the overall project description is provided in Chapter 2 of the EIAR.

2. Description of Proposed Development

2.1 Statutory Development Description

In accordance with section 37E of the Planning and Development Act 2000 (as amended), Bord Gáis Energy Limited gives notice of its intention to make an application to An Coimisiún Pleanála for a 10-year permission for the proposed development of a natural gas-fuelled electricity generation plant (named 'Cashla Peaker Plant') designed to provide flexible support to Ireland's power system. The plant will operate primarily on natural gas. The facility will be designed with dual-fuel capability, allowing the use of low sulphur diesel on a limited basis for emergency or back-up operation where required to ensure security of electricity supply. The proposed development site is 11.54 hectares and is located on lands at Pollnagroagh and Rathmorrissy (Townlands), Athenry, Co. Galway. The proposed development is intended to operate on a time-limited basis only, with an operational life up to and including 31 December 2050.

The proposed development will consist of:

a) The construction of a proposed power plant which will comprise an open-cycle gas turbine (OCGT) and generator with ancillary equipment including a 30m high stack and emissions monitoring unit, fuel storage and supply systems, cooling and air systems, compressed air and gas handling skids, a grid step-up transformer within a bund, an auxiliary transformer and an emergency diesel generator. The construction of ten buildings on-site including one single-storey administration building (approximately 390sqm), one-single storey ESB Substation building (approximately 32.5sqm), one single-storey workshop building (approximately 750.5sqm), one single storey water treatment plant building (approximately 104sqm), one covered fuel forwarding and unloading area (approximately 104sqm), one single-storey electrical control building (approximately 243.5sqm), one single storey gas analyser kiosk (approximately 6.25sqm), one single-storey boiler house kiosk (approximately 37sqm) including ten boiler flues (approximately 5.67m above ground level), one single-storey ancillary pressure reduction kiosk (approximately 21.7sqm) including four vents (approximately 3.72m high) and a single-storey electrical and instrumentation kiosk (approximately 19sqm). The installation of five above-ground tanks including two bunded fuel tanks (approximately 11.1m high), one fire and service water tank (approximately 13m high), one demineralised water tank (approximately 15.4 high) and one demineralised waste tank (approximately 5m high).

b) Ancillary works including the provision of a new gated vehicular entrance from the L3103, the construction of an access road from the proposed Cashla Peaker Plant site entrance to the proposed new entrance on the L3103, the demolition of one farm outbuilding (in

ruin), construction of internal circulation routes, hardstanding, security fencing (2.4m high), CCTV and gates, provision of a wastewater treatment system and associated underground wastewater storage tanks, drainage (foul and storm), soakaway retention pond, propane tank, underground firewater retention tanks, parking (12 no. spaces including mobility and EV Parking) and laydown area, 20 no. cycle parking spaces, landscaping and all ancillary on-site development works.

c) The construction of a Gas Networks Ireland (GNI) above ground pressure regulating installation, known as an Above Ground Installation (AGI). The AGI (named Rathmorrissy AGI) will connect to the mains transmission gas network which exists within the site. The AGI infrastructure will occupy an enclosed area of approximately 2,500 sq.m. It encompasses five single-storey buildings: a gas analyser kiosk (approximately 6.25 sqm), a boiler house kiosk (approximately 37 sqm) including ten boiler flues approximately 5.67m above ground level and emergency generator, two pressure reduction kiosks – main kiosk (approximately 72 sqm) including nine vents (approximately 5.24m high), and ancillary kiosk (approximately 21.7 sqm) including four vents (approximately 3.72m high) and an electrical and instrumentation kiosk (approximately 19 sqm). Ancillary infrastructure will include a gas meter, filters, heat exchangers, and above-ground pipework. The compound will include lighting, 3 no. parking spaces, internal circulation routes, concrete bases to support the infrastructure, and stone-chipped surfacing. It will be secured by an approximately 2.4 m high fence with an access gate.

An Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS) have been prepared in respect of the proposed development and accompany this planning application.

In addition to the above outlined proposed development, the "project", subject of the EIAR and NIS, includes the above proposed development and the construction of a 220kV substation compound within the Cashla Peaker Plant site and the construction an underground grid connection route from the proposed ESB Substation in the Cashla Peaker Plant Site to the Cashla 220kV Substation located across the townlands of Rathmorrissy, Pollnagroagh, Moanbaun, Castlelambert, Knocknacreeva, Caraunduff, Caherbriskaun, Lisheenkyle East, Barrettspark, Cashla, Athenry, Co. Galway. The grid connection route traverses approximately 8.1km including along the L7109, L71093, L7108 and L3103 roads. The substation and grid connection will be subject to a separate Strategic Infrastructure Development planning application submitted to An Coimisiún Pleanála. It is noted that the project, subject of the EIAR and NIS, also includes the connection to the existing mains gas network (Mayo–Galway pipeline (BGE/85)) which will be undertaken via a new transmission pipeline (named GNI146) located within the townland of Rathmorrissy, Athenry, Co. Galway. A separate application to obtain approval for the GNI146 gas pipeline will be submitted under section 39A of the Gas

Act 1976, as amended. It is anticipated that the substation, grid connection, AGI and gas connection will remain part of the national infrastructure and are not subject to the 2050 operational life end proposed for the Cashla Peaker Plant.

The application relates to development for the purposes of an activity requiring an Industrial Emissions license from the Environmental Protection Agency under the Environmental Protection Agency Act 1992, as amended.

It also relates to a COMAH establishment and therefore falls under the requirements of the Chemicals Act (Control of Major Accident Hazards Involving Dangerous Substances) Regulations, 2015.

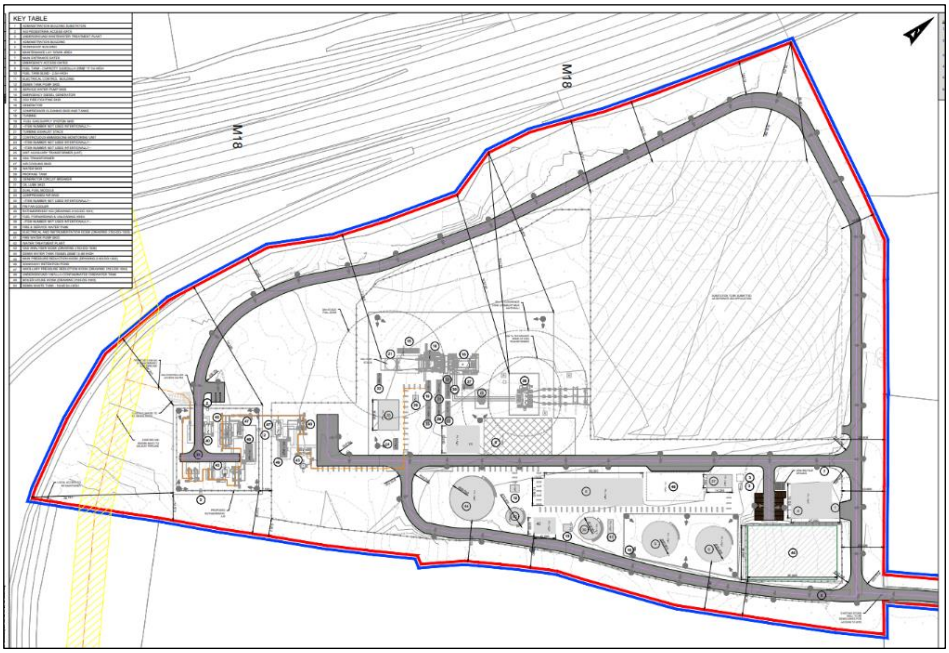


Figure 2.1 Extract of Site Layout Plan excluding access track and new entrance
Drawing No: PEK3-ATK-ZZ-01-DR-CE-900037 Source: AtkinsRéalis

2.2 Overview of Proposed Development and Processes

Chapter 2 of the EIAR provides a detailed overview of the project, including a full description of the processes involved. To avoid unnecessary repetition and in the interest of clarity, this section of the Planning Statement presents a summary description of the Proposed Development subject of this planning application i.e. the Peaker Power Plant, the Above-Ground Installation (AGI) and ancillary site development works. It does not provide detail on the proposed 220kV Substation and 220kV underground Grid Connection, or the proposed gas transmission connection infrastructure elements of the wider project set out in the EIAR as these will form part of separate consenting processes which will be submitted in due course, as detailed in section 1.3.

Reference should also made to the accompanying planning application drawings for further detail on the Proposed Development.

2.2.1 Cashla Peaker Plant

The Cashla Peaker Plant will operate as a 'peaking plant' with low annual use (i.e. anticipated to be in the order of 100 hours per annum though actual dispatch will be determined by Eirgrid's system requirements) running only during periods of high demand and lower renewable generation availability. The Proposed Development comprises an open-cycle gas turbine powering a generator to provide an electrical supply.

The gas turbine draws in air through an air inlet filtration system, compresses the air to raise the pressure, heats the air by combusting it with fuel, expands the hot pressurised air through a turbine connected to an electrical generator to produce electrical power and finally exhausts the air via an exhaust stack (30m high). The height of the stack was determined through a dispersion modelling assessment. The purpose of the stack is to safely expel exhaust air from the gas turbine in compliance with Air Quality Standards which will be monitored during the operational period.

Depending on the turbine technology selected at procurement stage, the overall electrical output of the plant will be either 325MW or 334MW. All physical parameters of the turbines, including dimensions, siting, stack height and associated infrastructure remain the same in both scenarios. The only variable relates to the generating output capacity, which reflects differences in turbine model efficiency rather than any change in built form or environmental envelope. As there is no alteration to the physical characteristics of the development, a design flexibility opinion from An Coimisiún Pleanála is not required.

A proposed step-up transformer will increase the voltage of the electricity generated by the gas turbine to the export voltage of 220kV. The electricity will then be transferred to a proposed on-site 220kV substation. From there, it will be exported via an underground grid connection cable to the existing Cashla 220kV Substation.

As noted elsewhere in this Planning Statement, the proposed 220kV substation and associated grid connection infrastructure will be the subject of a separate planning application to the Commission.

The electricity for the Plant's electrical equipment will be supplied via a proposed Unit Auxiliary Transformer which will either be supplied from electricity generated by the gas turbine generator when in operation or from imported power from the 220 kV grid connection when the gas turbine generator is not in operation.

The gas turbine will operate primarily on natural gas. In accordance with EirGrid requirements, the plant will also be equipped to operate on low sulphur diesel as a secondary back-up fuel. A supply of secondary fuel will be stored on site to ensure the plant can provide support to the electrical transmission network in circumstances where the primary gas supply is unavailable. The electrical generation capacity required to be achieved using secondary fuel is stipulated by EirGrid to be at least 90% of the capacity achieved with the primary gas fuel. Accordingly, the plant must be capable of

delivering at least 90% of its natural gas generation capacity when operating on secondary fuel.

Testing of the secondary fuel system is anticipated to be limited to approximately 18 hours per annum, and routine operation on secondary fuel is not expected outside of such testing or exceptional grid security events.

The Proposed Development has been designed to retain fuel flexibility within the assessed parameters, thereby enabling the potential future substitution of lower-carbon fuels, including Hydrotreated Vegetable Oil (HVO) or equivalent alternatives, subject to availability, regulatory approval, and confirmation that no additional environmental effects would arise.

Ancillary Buildings & Structures

To support the operation of the Cashla Peaker Plant, the following buildings and structures, in addition to those listed in section 2.2.2 below, are required and proposed as part of this planning application:

- 1 Administration Building;
- 1 ESB Substation Building;
- 1 Workshop Building;
- 1 Electrical Control Building;
- 1 Water Treatment Plant Building;
- 1 Covered Fuel Forwarding and Unloading Area;
- 1 Gas Analyser Kiosk;
- 1 Boiler House Kiosk;
- 1 Ancillary Pressure Reduction Kiosk;
- 1 Electrical and Instrumentation Kiosk;
- 2 Fuel Tanks;
- 1 Fire and Service Water Tank;
- 1 Demineralised Water Tank;
- 1 Demineralised Waste Tank
- 1 Demin Tank Pump Skid
- 1 Service Water Pump Skid
- 1 CO2 Firefighting Skid
- 1 Compressor Cleaning Skid and Tanks
- 1 Fuel Gas Supply System Skid
- 1 Air Cooling Skid
- 1 Water Skid
- 1 Oil Lube Skid
- 1 Dual Fuel Module
- 1 Compressor Air Skid
- 1 Fin Fan Cooler
- 1 Fire Water Pump Skid
- 1 Underground Wastewater Treatment Plant
- 1 Underground Firewater Tank

The proposed Cashla Peaker Plant will operate with modern automated control systems, with on-site personnel present for maintenance, inspection and security as required. Day-to-day staffing levels will typically comprise 2–

3 maintenance or security personnel, with an expected maximum of approximately 10 persons on site at any one-time.

The proposed development will also include the installation of a main carpark including 1 accessible (disability) parking space, 3 electric vehicle (EV) charging spacesand 8 standard parking spaces. An additional 3 parking spaces are proposed within the AGI compound (discussed below) bringing the total number of parking spaces for the Proposed Development subject of this planning application to 15 spaces.

In addition, 20 bicycle parking spaces are proposed to support sustainable travel

Further information and detail on the buildings and structures can be found in Chapter 2 of the EIAR, the Architectural Design Statement enclosed in Appendix 2 of the EIAR and the enclosed planning application drawings.

2.2.2 Above Ground Installation

To supply gas to the gas turbine and generator, an above ground installation (AGI) compound is proposed as part of this planning application. The proposed AGI compound will consist of five buildings, in addition to those listed in section 2.2.1 above, including;

- 1 Gas Analyser Kiosk;
- 1 Boiler House Kiosk;
- 1 Main Pressure Reduction Kiosks;
- 1 Ancillary Pressure Reduction Kiosk;
- 1 Electrical and Instrumentation Kiosk

The compound will also include lighting, 3 parking spaces, internal access routes, concrete bases to support the infrastructure, and stone-chipped surfacing. It will be secured by an approximately 2.4 m high fence with an access gate.

The Gas Networks Ireland (GNI) Mayo–Galway gas transmission pipeline (BGE/85) exists within the southern portion of the Proposed Development site. Natural gas will be supplied to the proposed AGI from this gas transmission network, via a new transmission pipeline (named GNI146) that will connect to the existing BGE/85 pipeline.

The proposed GNI146 gas pipeline is subject to Section 39A Consent under the Gas Act 1976, as amended and does not form part of this section S.37E planning application but has been assessed in the accompanying EIAR as an integral part of the project.

No full-time staff are required during the operation of the AGI. Maintenance staff will carry out routine checks every 2-4 weeks.

2.2.3 Ancillary Site Development Works

Access

The proposed development site will be accessed from a proposed new entrance off the L3103 local road to the north of the main development site via a proposed access track approx. 1.15km in length (refer to Figure. The

proposed new entrance will be gated, and works will include the realignment of the existing stone wall, the removal of several trees and the relocation of the existing ESB pole to achieve 90m sightlines in both directions. Further detail is provided in the 'Entrance Gate' drawing (Drawing Ref No. PEK3-ATK-ZZ-ZZ-DR-A-ATK-000040) and the Site Access Sightline drawing prepared by AtkinsRéalis (Drawing Ref No. PEK3-ATK-ZZ-01-DR-CE-901200).

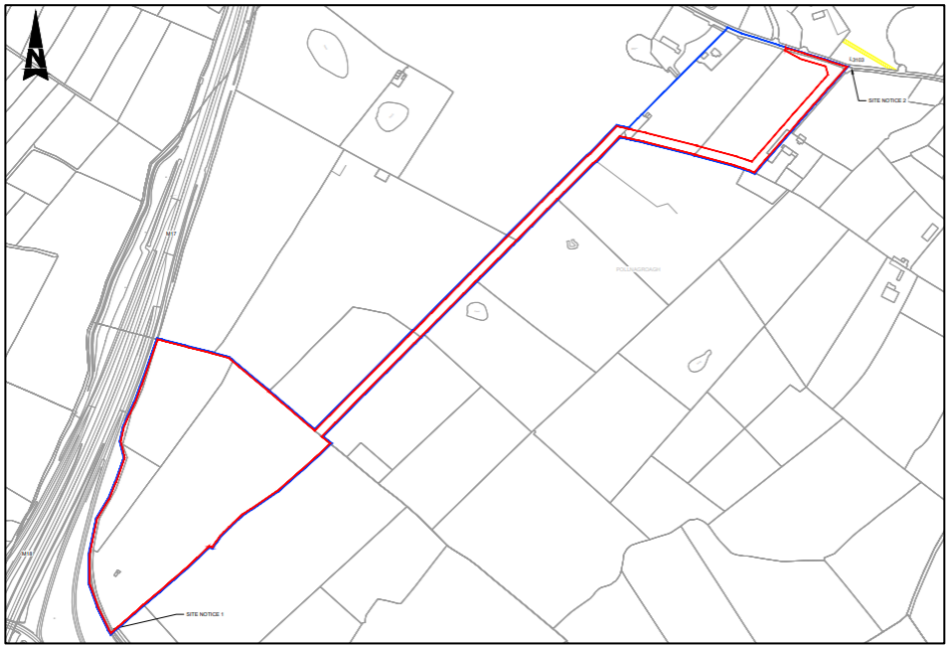


Figure 2.2 Extract from Site Location Map prepared by AtkinsRéalis (Drawing Ref. No. PEK3-ATK-ZZ-01-9000002)

Demolition

There is one existing agricultural building comprising two sheds (in ruin) located in the area of the proposed AGI development which is proposed for demolition as part of this planning application. The demolition of the stone agricultural building is required due to its unsafe condition and lack of reuse potential. Refer to Drawing No: PEK3-ATK-ZZ-ZZ-DR-A-ATK-000048 prepared by Atkins Réalis for detail on the sheds to be demolished.

Landscaping

Excavated subsoil and topsoil arising from the Proposed Development will be reused onsite as part of the landscaping works, including landform re-shaping and the creation of bunds and other features.

Any excess subsoil or topsoil that cannot be reused onsite will be removed and transported to a suitably permitted or licensed waste recovery or disposal facility in accordance with relevant waste management legislation. All soils will be characterised in accordance with EPA guidance prior to any offsite removal.

Where applicable, an application may be made to the EPA under Article 27 of the European Communities (Waste Directive) Regulations 2011 in respect of

by-product status, where a definite use for the material can be demonstrated. Alternatively, an application may be made under Article 28 in respect of end-of-waste criteria, where the material has been recovered or recycled and meets the relevant statutory requirements. These provisions facilitate the beneficial reuse of suitable materials in accordance with the regulatory framework.

Soft landscape measures comprised of structural planting of mixed native woodland belts and seeding will be implemented as early as possible on areas of land to be left undeveloped or undisturbed by construction activity, to allow the establishment of new planting. Landscape Drawings have been prepared by Eamonn Byrne Landscape Architects and can be found enclosed with the planning application drawing pack (Refer to Drawing Nos: 24032-CO-LP-1-01-REV-10, 24032-CO-LP-1-02-REV-10 and 24032-CO-LP-1-03-REV-10, Refer also to Chapter 6 Landscape and Visual of the EIAR).

Figure 2.3 Extract of 'View 1 Proposed' from photomontage booklet. Source: EIAR Volume 3: Appendix 6.1

Lighting

A proposed site lighting layout for the Cashla Peaker Plant, including the AGI compound, has been developed by AtkinsRéalis and a proposed site lighting layout plan can be found enclosed with the planning application drawing pack (Refer to Drawing No: PEK3-ATK-ZZ-ZZ-DR-EE-901300).

Two lighting design reports i.e. one for the AGI compound prepared by Fingleton White and one for the remaining site prepared by Lighting Reality, can also be found enclosed in Appendix 2 of the EIAR. Site lighting will be cowled with the exception of the AGI compound (where 4 no. 8-metre-high floodlights are proposed). Lighting within and around the perimeter of the site will consist of 57 no. 8-metre-high lighting columns. 5 no. 20-metre-high lighting columns are also proposed around the turbine and stack area. No

lighting is proposed along the 1.15km access track from the L3103 to the main entrance of the site to minimise the impact on the surrounding area.

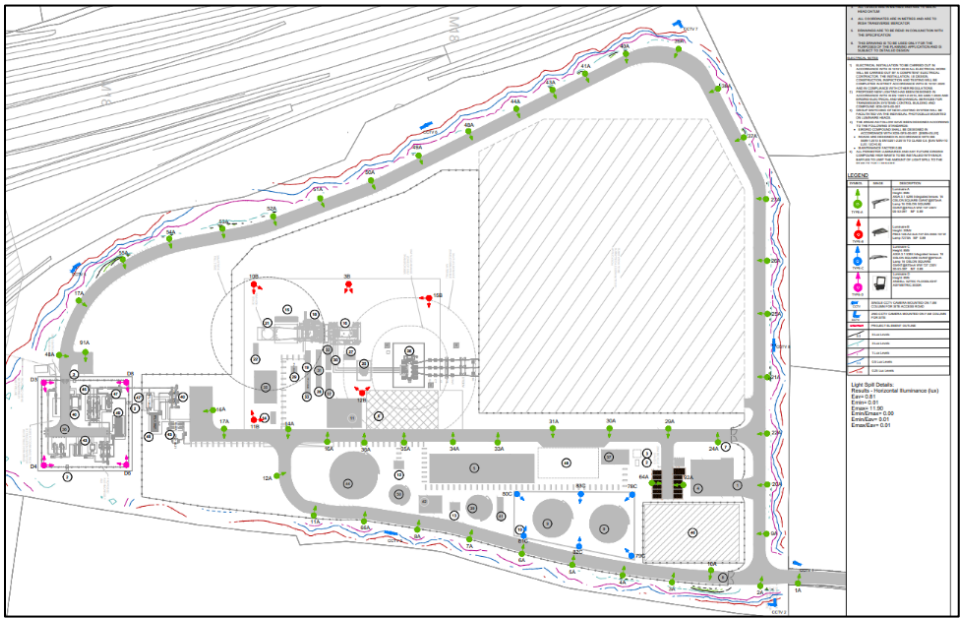


Figure 2.1 Extract from Site Lighting Layout Plan. Drawing Ref No. PEK3-ATK-ZZ-ZZ-DR-EE-901300 Source: AtkinsRéalis

Fencing

The proposed development site will be enclosed by a 2.4m high palisade security fence (refer to Figure 2.4 below).

The proposed new access track running from the internal main entrance of the peaker plant compound to the proposed new entrance off the L3103 will be enclosed by a post and rail fence of approximately 1.3m in height. This fence will include a 350mm gap from the bottom edge of the fence to the ground for wildlife access clearance (refer to Figure 2.5. below).

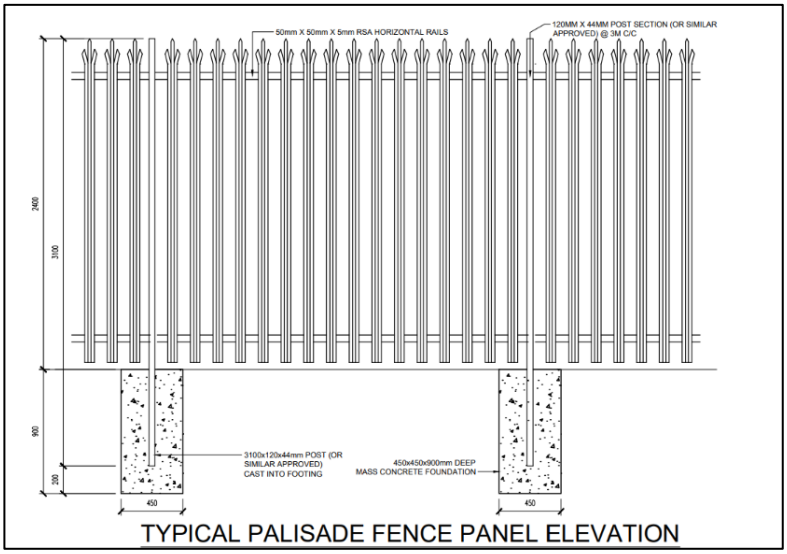


Figure 2.4 Extract of Typical Palisade Fence. Source: AtkinsRéalis Drawing No. PEK3-ATK-ZZ-01-DR-CE-903106

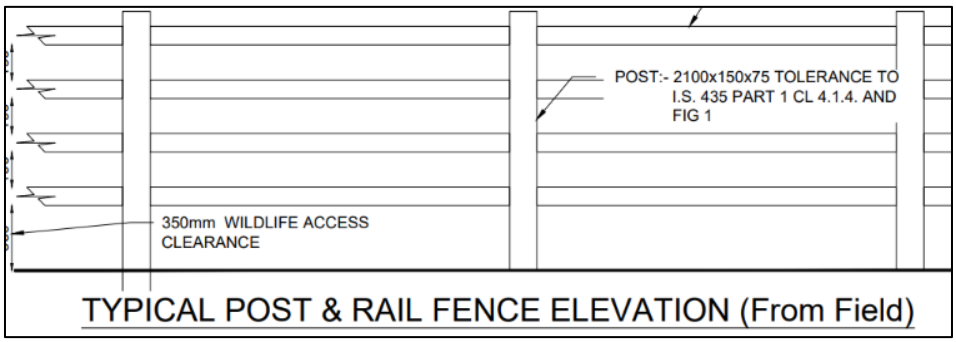


Figure 2.5 Extract of Post and Rail Fence. Source: AtkinsRéalis Drawing No. PEK3-ATK-ZZ-01-DR-CE-903106

Refer to Drawing No. PEK3-ATK-ZZ-01-DR-CE-903106 prepared by Atkins Réalis for further detail.

Emergency Diesel Generator

In the event that the facility was to be disconnected from the EirGrid transmission network and an alternative power supply was not immediately available from the local ESB distribution connection, a back-up power supply is required and as such a containerised Emergency Diesel Generator is proposed.

Propane Gas Storage

If the gas turbine is required to start-up with secondary diesel fuel, a small quantity of propane gas, circa 35 kg, would be used. The propane is required to reliably establish a flame in the combustion system prior to injecting the diesel fuel.

Surface Water Drainage

It is proposed to provide the site with a new stormwater management network incorporating Sustainable Drainage Systems (SuDS) measures. There are no existing storm sewers or culverts in the immediate surroundings and, accordingly, it is proposed that stormwater generated by the development will discharge via infiltration to ground.

The proposed SuDS measures will include:

- Filter drains (external to the site)
- An infiltration pond incorporating a hydrocarbon interceptor
- Sealed permeable paving within the car parking areas

Storm runoff will be collected via a series of gullies, linear drains and filter drains, and will ultimately discharge to the proposed infiltration pond located to the north of the site. Prior to discharge, runoff will pass through a Class 1 full retention hydrocarbon separator.

The stormwater network will be segregated into distinct drainage zones to facilitate the containment and collection of potentially contaminated firewater. These segregated areas will operate by gravity flow and will be controlled by actuator valves to manage and direct flow paths as required.

The site will be subject to an EPA Industrial Emissions Licence (IEL). As such, strict controls will apply to stormwater discharge, including measures to prevent the uncontrolled release of contaminated firewater to ground. The proposed drainage design has been developed in accordance with these regulatory requirements.

Further detail is provided in the enclosed planning application drawings and the Engineering Planning Report contained in Appendix 2 of the EIAR.

Potable Water Supply

It is proposed to supply the site with potable water via a new 150mm diameter water main which will come from Athenry (approx. 2km) and be installed by Uisce Éireann to the site entrance on the L3103 as outlined in the Confirmation of Feasibility enclosed in appendix B of the Engineering Planning Report (which can be found in appendix 2 of the EIAR). The expected average daily use of potable water for 10 P.E is 1000 L/day. All new water mains have been designed and installed in accordance with Uisce Éireann Code of Practice for Water Infrastructure and standard details (IW-CDS-5020-03).

Foul Wastewater

The onsite foul sewer network has been designed in accordance with Uisce Éireann standards and will comprise a combination of gravity-fed and pumped systems. The pumped section will lift effluent from the administration building to the proposed wastewater treatment plant (WWTP).

The proposed WWTP will be designed and installed in accordance with the EPA Code of Practice for Domestic Wastewater Treatment Systems. Given the limited on-site staffing levels typically 2–3 maintenance or security personnel, with a maximum of approximately 10 persons present at any one time the system will be appropriately sized to accommodate domestic wastewater arising from these low occupancy levels.

The WWTP will comprise a packaged domestic treatment unit (e.g. a 10-person ONE2CLEAN Wastewater Treatment System by Graf G50006 or equivalent approved system). Treated effluent will discharge to underground storage tanks. These tanks will be emptied by tanker on a regular basis (anticipated weekly) and transported to an appropriately licensed off-site wastewater treatment facility nearby by a licensed contractor.

The inclusion of the on-site package treatment unit will ensure adequate treatment of effluent prior to storage and will prevent septicity occurring within the storage tanks between collection intervals.

Demineralised Water

As part of the plant's turbine operation requirements, demineralised water is necessary. Demineralised water (highly purified water with dissolved minerals removed) will be used on site for equipment protection and operational purposes. The use of demineralised water prevents scaling and

corrosion within plant systems and supports efficient and compliant operation of the facility.

This water is injected into the turbine either for power augmentation when using gas or to reduce nitrogen oxide (Nox) gases when running on fuel oil. In both cases, the injected water vaporizes and exits the turbine through the stack.

To produce the demineralised water, an onsite water treatment plant will convert potable water supplied by Uisce Éireann into demineralised water, which will be stored in a tank until needed. The conversion process is expected to be approximately 75% efficient, meaning that 25% of the water used will be rejected as heavily mineralised wastewater. This wastewater will be stored in the contaminated firewater tank and removed off-site as required toa suitably licenced treatment plant. Please refer to the Engineering Planning Services Report prepared by Atkins Réalis enclosed in Appendix 2 of the EIAR for further detail.

Contaminated Firewater

The IE licensing requirements mean the site must collect all potentially contaminated firewater produced during a fire and store it for later disposal off-site by tankers. To manage the contaminated firewater tank, it is proposed to divide the storm network into multiple individual areas. Each area will have a pH-controlled actuator valve. In the event of a fire, the firewater from the affected area will be diverted to the firewater tanks using these actuator valves, while any rainfall during the fire in other areas will continue to flow unimpeded to the soakaway pond northeast of the site.

The contaminated firewater will be disposed of off-site by tanker to a suitable licenced treatment facility. The tank will also have a dual use as a storage tank for rejected water during the production of demineralised water. Please refer to the Engineering Planning Services Report prepared by Atkins Réalis enclosed in Appendix 2 of the EIAR for further detail.

2.3 Construction Phase

2.3.1 Overview

This section should be read in conjunction with Chapter 2 of the EIAR, the Outline Construction Environmental Management Plan (oCEMP), the Engineering Planning Services Report and the Resource & Waste Management Plan (RWMP) all prepared by AtkinsRéalis and enclosed in Appendix 2 of the EIAR.

Construction will be managed by an appointed Contractor in accordance with good practice and procedures set out in the oCEMP and the RWMP. The oCEMP outlines the environmental management and control framework for the construction phase relating to waste, air quality, noise and vibration, climate management, pollution prevention, water resources and energy use, ecology, light pollution, archaeology and cultural heritage, traffic management, contaminated land control, soil erosion and sedimentation,

material assets and landscape and visual, along with other best practice approaches.

2.3.2 Description and Duration

It is expected that construction will commence in Q2 2027 with procurement, construction, and commissioning activities lasting approximately 18 months. The plant is expected to be fully operational by Q4 2028 as detailed in table 2.1, subject to timely receipt of the necessary statutory consents.

Table 2.1. Construction Phasing

Milestones	Timeframe
Submission of planning application	Q1 2026
ACP Planning Application decision	Q1 2027
Civil, Mechanical, Electrical Design, Site Survey works & Mobilisation start	Q1 2027-Q2 2027
Construction and Installation	Q2 2027-Q3 2028
Commissioning	Q3 2028
Commercial Operational Date	Q4 2028

2.3.3 Construction Hours

Table 2.2. outlines the proposed standard working hours which are set out for the proposed development in the oCEMP.

Table 2.2. Standard Working Hours

Time Period	Peaker Plant	AGI
Weekdays: Mon -Fri	07h00 – 18h00	07h00 – 18h00
Saturdays	07h00 -14h00	07h00 -14h00
Sundays, Bank Holidays and Public Holidays	No Work	No Work

On certain occasions, work may need to be undertaken outside of the typical working day to expedite progress, meet critical milestones, or address unforeseen circumstances that could impact the programme; however all such works would only be carried out following prior consultation with Galway County Council. Refer to Section 6.3 of the oCEMP for further details.

To facilitate this, it is respectfully requested that any forthcoming Grant of Permission include the following **Condition** or similar:

Construction activities associated with the development shall be carried out only between the hours of:

- 07:00 to 18:00 Monday to Friday; and

- 07:00 to 14:00 on Saturdays,

with no construction activity permitted on Sundays or Public Holidays, unless otherwise agreed in writing with Galway County Council.

In exceptional circumstances, work outside these hours may be undertaken where necessary to address unforeseen events, ensure safety, maintain programme-critical activities, or facilitate abnormal or exceptional load deliveries, subject to prior written agreement with Galway County Council save in the event of an emergency where prior written agreement shall not be required.

Reason:
In the interests of residential amenity and environmental protection during the construction phase of the development.

2.3.4 Demolition

Localised demolition works will take place prior to construction involving the demolition of the farm outbuilding which is in-ruin. All demolition waste will be managed in accordance with the RWMP prepared by AtkinsRéalis.

2.3.5 Construction Compound

There will be one site compound onsite during the construction and demolition works. Facilities will include welfare facilities and site offices for construction management and staff. Refer to Section 7.2. of the oCEMP for further information.

2.3.6 Construction Traffic

The project will generate short-term employment during construction. It is expected that at peak construction, up to 150 workers are expected on-site. All parking during the construction period will be provided on the Cashla Peaker Plant/AGI site within the site compound.

Construction traffic volumes, access routes, and traffic mitigation measures are addressed in the Construction Traffic Management Plan (CTMP) prepared by AtkinsRéalis provided in Appendix 2 of the EIAR and Chapter 10 Traffic and Transportation of the EIAR.

The proposed new entrance to the Cashla Peaker Plant site is expected to receive both standard and abnormal load deliveries. Standard deliveries will be facilitated via the immediate regional road system which include the following roads (in order of proximity to the site): L3103, R339, R347, M6 and the M17.

2.3.7 Exceptional Abnormal Loads

The Proposed Development requires the transfer of Exceptional Abnormal Loads to the site. An Exceptional Abnormal Load is defined as a vehicle heavier than 180 Tonnes and the Proposed Development will require the transport of components that exceed this weight.

The anticipated haul route for the abnormal loads will originate at the Port of Galway, proceeding via Lough Atalia Road (R339) before joining the N6 (which

becomes the M6 motorway). The route will continue eastbound along the M6 to Junction 17 (R348) at Athenry. From this junction, the route will proceed via the R348 onto Ballygarraun South Road, before connecting to the L3103, which provides direct access to the Proposed Development site.

The final haul route will be confirmed prior to the first abnormal load delivery in accordance with the statutory abnormal load permitting process.

An Abnormal Load Assessment report and Haulage Route Pavement Analysis have been prepared by AtkinsRéalis and can be found enclosed in Appendix 2 of the EIAR. These reports evaluated the feasibility of transporting components from Galway Port to the Proposed Development site via two proposed routes and served to identify the preferred haul route which was confirmed as suitable for abnormal load transport (refer to oCTMP for detail on the haul route).

As set out in the oCTMP, the final haul route will be agreed prior to the delivery of extraordinary or abnormal loads to the site, which may occur several months after on-site construction begins. Pre and post-construction surveys of the public road network proposed for use as haul routes, including inspections of bridges, culverts, and other relevant structures, shall be carried out by the applicant before any phase involving abnormal load movements. These requirements do not apply to earlier phases without such movements. The scope and locations of these surveys shall be agreed in advance with Galway County Council Roads Authority and include structural capacity assessments where required.

In accordance with national abnormal-load permitting requirements, the applicant will undertake detailed route assessment, secure the necessary Garda or Local Authority permits, and coordinate escorts and traffic management measures as required. This process includes early engagement to ensure no undue disruption to other road users. Final delivery timing and movement arrangements, such as off-peak or night-time transport to minimise traffic impacts will be confirmed with An Garda Síochána and Galway County Council and Galway City Council, reflecting best-practice planning to reduce disruption to regular traffic and maintain safety during abnormal-load movements.

It is respectfully submitted that any condition relating to construction working hours should have regard to the fact that abnormal or exceptional load deliveries are governed by the statutory abnormal load permitting process and agreed traffic management arrangements and deliveries may take place outside of standard construction hours.

It is envisaged that, prior to the first delivery of any abnormal or exceptional load to the site (and not prior to commencement of development generally), a detailed Abnormal Load Management Plan will be submitted to and agreed in writing with the Planning Authority. This Plan will confirm the final haul route, condition surveys of affected sections of the public road network (including bridges and culverts), any necessary accommodation works, traffic management measures, and confirmation of statutory abnormal load permits and Garda escort arrangements. The timing and management of

such deliveries will be coordinated with the relevant road authorities and An Garda Síochána in accordance with the statutory abnormal-load permitting process.

It is respectfully submitted that any Grant of Permission include a **Specific Condition** to address this as follows:

> Prior to the first delivery of any abnormal or exceptional load associated with the development, the applicant shall submit to, and agree in writing with the relevant the Roads Authority(s) an Abnormal Load Management Plan. The Plan shall confirm the final haul route, pre- and post-delivery condition surveys of the public road network (including bridges and culverts where required), any necessary accommodation works, traffic management measures, and confirmation of statutory abnormal load permits and Garda escort arrangements.
>
> The delivery of abnormal or exceptional loads may take place outside standard construction working hours where required under the statutory abnormal load permitting process and as agreed with the relevant Roads Authority(s).
>
> ***Reason:***
> *In the interests of road safety, protection of public infrastructure, and the orderly management of abnormal load movements.*

2.4 Decommissioning

An operational life up to and including the 31st of December 2050 is proposed for the Cashla Peaker Plant. Any proposal to extend the operational life of the plant or to repower in the future would require a separate planning application and would be subject to the relevant statutory consent requirements and any associated environmental assessment in force at that time.

The Cashla Peaker Plant will be subject to IE Licence requirements, and the applicant will be required to prepare and maintain an Environmental Liabilities Risk Assessment (ELRA) and/or a Closure, Restoration and Aftercare Management Plan (CRAMP).

The proposed AGI will be owned and operated by GNI, who will retain full responsibility for the operation, maintenance, and any future development of the facility.

The operational lifespan of the AGI is not linked to the consented life of the Cashla Peaker Plant. The AGI is a standalone grid infrastructure installation and is not dependent on the continued operation of the proposed peaker plant. The AGI does not generate electricity. It is a grid interface and control installation that facilitates connection and management of electrical infrastructure. As such, it does not constitute a power generating development.

It is anticipated that the AGI will be maintained over the long term to accommodate future grid demand.

2.5 Project Need

The following section sets out the need for the project with specific reference to the policy support for the project, the rationale for open-cycle vs combined-cycle technology and the operational lifespan proposed.

The purpose of this project is to enhance the capacity of the national grid by providing additional generating power when renewable energy production is insufficient to meet demand. Operating as a 'peaker plant' with minimal annual use (i.e. anticipated to be in the order of 100 hours per annum though actual dispatch will be determined by system requirements), the facility will provide backup or 'flexible' generation during critical periods when renewable energy sources are not sufficient to meet demand.

For the avoidance of doubt, the term 'peaker' in this context refers to a dispatchable, fast-start facility operating intermittently to support system adequacy during periods when 'renewable energy sources' cannot meet demand.

2.5.1 Policy Support

The need for new gas demand flexibility measures, such as the Cashla Peaker Plant Project, is directly related to energy security and is highlighted in national planning, regulatory and power system operator policies. This is particularly emphasised in the '*Policy Statement on Security of Electricity Supply*' published by the Government in November 2021 where it states that the Government has approved that:

> *"the development of new conventional generation (including gas-fired and gasoil/distillate-fired generation) is a national priority and should be permitted and supported in order to ensure security of electricity supply and support the growth of renewable electricity generation…". (p.5)*

Planning authorities were advised through *Circular Letter PL/2021 - Government Policy Statement on Security of Electricity Supply,* issued by the Government on the 10th December 2021, that where planning applications are submitted for electricity infrastructure or infrastructure that may impact on electricity supply – including for existing conventional electricity generation – that they should, until further notice, be considered having regard to the Policy Statement on Security of Electricity Supply. The National Energy Security Framework, published by the Government in 2022, further reiterated the importance of increasing the level of dispatchable electricity generation capacity significantly over the coming years in order to reliably meet the expected demand for electricity.

'Energy Security in Ireland to 2030', which was published by the Government in November 2023 as part of an Energy Security Package, outlines a new strategy to ensure energy security in Ireland for this decade, while ensuring a sustainable transition to a carbon neutral energy system by 2050. The strategy acknowledges that Ireland's current energy system presents several

risks in ensuring uninterrupted availability of energy sources. Two key risks relevant to the project are supply-side risks and demand-side risks.

From a supply-side perspective, the report notes that

> *"Supply-side risks usually occur where there is the loss of supply from production or infrastructure facilities. Potential disruptions to supply can be caused by (i) infrastructure or technical risks such as an outage of network infrastructure facilities, (ii) market risks such as expected imports being diverted to other markets due to sudden events and price responsiveness (this includes price risk rather than loss of physical supplies), and (iii) geopolitical risks such as when a key supply source becomes unavailable or significantly reduced due to global geopolitical events and/or natural disasters. As one of the most energy import dependent countries in the EU with limited diversity of supply, Ireland is exposed to this risk. In 2022, 82% of Ireland's energy needs came from imports. 48% of energy used in 2022 was from imported oil and nearly 31% from natural gas. 74% of Ireland's natural gas came from imports through two interconnectors from the UK." (p.8)*

From a demand-side perspective, the reports states that

> *"a risk can occur where there is the possibility of sudden increases in energy demand over a relatively short period of time that cannot be met by corresponding increases in supply. Demand-side risks are generally caused by weather-related events such as cold snaps or periods of low wind or a combination of these events." (p.9)*

The strategy recognises that, while the supply-side risks will reduce as Ireland increases its renewable energy generation capacity, there will be an increase in demand-side risks as we transition away from fossil fuels such as coal and oil. Weather events will impact on the availability of renewables such as wind and solar power and the dependence of the electricity system on natural gas is expected to increase in the short- to medium-term, particularly at times of very low wind.

> *"In addition, the peak day demand for natural gas is expected to increase. This means the electricity system will continue to rely on natural gas as a fuel source as it transitions to a majority-renewables system and phases out natural gas in the medium-term." (p.9)*

Taken together, national energy and climate policy clearly recognises that additional flexible, dispatchable electricity generation is required as a matter of public interest to maintain security of supply during the transition to a renewables-led electricity system. This need is identified at national level and is not dependent on local electricity demand.

The strategy document sets out a number of actions required to strengthen Ireland's Energy Security including Action 8 *'to complete the implementation of the CRU Security of Electricity Supply Programme'*. This action acknowledges the programme of work undertaken by the Commission for the Regulation of Utilities (CRU) to mitigate the risks of an identified shortfall in generation capacity in the electricity sector since the declaration of a capacity crisis in

this sector in 2021. The procurement of at least 2GW of new, flexible, enduring, capacity through market mechanisms is included in the CRU-led Security of Supply programme of actions under Action 8.

This target is also reflected in the latest annual Climate Action Plan published by the government, Climate Action Plan 2025 (CAP 2025), which sets out the specific target to deliver at least 2GW of new flexible gas plant by 2030. CAP 2025, to be read in conjunction with CAP 2024, reiterates the role of flexible capacity in maintaining security of supply during the net zero transition. CAP 2024 states that:

> *"Considerable progress has been made in decarbonising the electricity sector, resulting in electricity emissions falling by 45% between 2001 and 2022. This was possible through the deployment of renewables and their successful integration into the electricity grid, as well as the increased use of higher efficiency gas turbines. 2021 and 2022 have seen increases in emissions of 1.4-1.5 million tonnes when compared to 2020, as 2021 saw both a "low wind" yield and a number of outages of the lower-carbon intensity gas-fired generators, resulting in an increase in the use of coal and oil. This highlights the need to diversify our renewable electricity generation sources and increase our gas-fired generation capacity." (p,158)*

The Cashla Peaker Plant project directly supports the achievement of this and, depending on the technology that is used, the turbines will have a total output capacity of either 325MW or 334MW (refer to Chapter 8: Climate of accompanying EIAR) and as such is aligned with Government policy on security of electricity supply and the transitional pathway set out in national climate and energy policy.

As set out in the letter prepared by Mason, Hayes and Curran LLP (MHC) enclosed in Appendix 2 of this planning statement, under S34(13) of the Planning and Development Act 2000 (as amended) "*A person shall not be entitled solely by reason of a permission under this section to carry out any development*" (p.2). In this regard it is important to note that the project has been allocated a capacity contract in the 2028 / 2029 T-4 Capacity Auction. As stated by MHC in the enclosed letter, the importance of the capacity contract is twofold:

> *"Firstly, this is an important requirement outside of planning to facilitate development…*
>
> *Secondly, it is notable that the capacity auctions, run by EirGrid and SONI in their roles as Transmission System Operators in Ireland and Northern Ireland respectively, through the joint venture SEMO (Single Electricity Market Operator) were designed by the electricity regulators in Ireland and Northern Ireland to ensure sufficient capacity is secured to meet demand across the island." (p.3)*

It is clear from the awarding of the capacity contract to the Cashla Peaker Plant that the project is deemed necessary by the electricity regulators to ensure that sufficient capacity is secured to meet demand, and there is a

need for this project in line with the actions set out in the national energy security package.

The allocation of a capacity contract does not confer any planning entitlement and is not relied upon as such; rather, it is material evidence that the Proposed Development forms part of the regulated framework designed to ensure sufficient generation capacity is secured to meet forecast demand.

In planning terms, electricity generation infrastructure of this nature serves a strategic, national function and is not directed by local demand in the manner of conventional land uses. While national policy establishes the need for such development in principle, the suitability of the Proposed Development at this location has been assessed having regard to the availability of grid and gas infrastructure and the capacity of the receiving environment to accommodate the development without significant environmental effects, as addressed in the accompanying EIAR.

2.5.2 Open Cycle Vs Combined Cycle Technology

As set out above, the purpose of the Cashla Peaker Plant is to provide backup or 'flexible' generation during critical periods when renewable energy sources are not sufficient. It is therefore essential that the project is designed to allow for a quick response to shortfalls in power generation at times of high demand. This is a critical factor when considering whether to use open-cycle or combined-cycle technology in the design of a peaking power plant. For the proposed development, open-cycle technology was selected and the rationale for this is set out in detail in Chapter 3 Reasonable Alternatives of the accompanying EIAR.

In summary, the open-cycle technology configuration provides a much quicker response time to start and begin generation in comparison to combined-cycle. This fast response time is required to meet the rapid changes in the transmission grid electrical supply and demand imbalance. The time to reach maximum load for an open cycle gas turbine is about 30 minutes but can be over 2 hours for a combined cycle. Therefore, if EirGrid require 1 hour of generation at a given time, the combined cycle technology would combust fuel at various loads for at least 1.5 hours more than the open cycle technology before the required 1-hour operating period. On this basis, the combined cycle technology would be expected to consume more fuel for the total period and therefore produce more total emissions in the context of a peaking plant.

While it is acknowledged that over longer operating periods, combined cycle gas turbines are more efficient and produce less emissions per MW once operating at maximum load, for short generation periods to support the grid, the combined cycle can require more fuel to be combusted and therefore more emissions due to its much longer startup time compared to an open cycle. On this basis, an open cycle design is appropriate for the function of a Peaker Plant operating for occasional short peak periods to support the grid.

The consideration of reasonable alternatives, including alternative technologies, is addressed in detail in Chapter 3 of the accompanying EIAR in accordance with the requirements of the EIA Directive.

2.5.3 Operational Life

An operational life up to and including the 31st December 2050 is proposed for the development. The operational life sought is based on the use of natural gas to fuel the turbine.

As detailed above, the use of natural gas to fuel the turbine for an operational period up to the end of 2050 is anticipated in national policy where flexible gas generation in support of renewable energy sources is recognised as a critical component of the achievement of energy security in Ireland. As such the proposal is aligned with Government policy on security of electricity supply and the transitional pathway set out in national climate and energy policy as set out in the Climate Action and Low Carbon Development Act 2015, as amended by the Climate Action and Low Carbon Development (Amendment) Act 2021 (together the "Climate Act"), to achieve a climate neutral economy by no later than the end of 2050. In this regard, the letter provided by MHC in Appendix 2 includes the following extracts from the judgments of the High Court and Supreme Court in Coolglass Wind Farm Limited v An Coimisiún Pleanála [2025] IEHC 1, [2026] IESC 5:

> *High Court, at para132*
>
> *"The concept of net zero implies a continuing necessity for some emissions in the short term at least. That relates to the fact that pending complete adaptation of the economy, there will be other imperatives of economic necessity that require projects that, in and of themselves, wouldn't support climate goals in isolation."*
>
> *Supreme Court, at para 86*
>
> *"**The second reason the [High Court] judgment gives is more important. It acknowledges that the concept of net zero contemplates a balance between projects, and can encompass some which may be emission generating, but are of particular economic, social, and community advantage, and other projects**. Because the national climate objectives are stated as a total global figure, the refusal of permission for a particular project which is said to be climate friendly, and **the grant of permission for one which may create greenhouse gases, may still be consistent with the overall achievement of climate targets**. A target is a net one to be assessed globally. But if that is so, and it is, the qualified consistency obligation imposed by s. 15(1) cannot be the sole or even principal determinant of the refusal or grant, or grant subject to conditions (subject to practicability) of planning permission. Considerations of proper planning and sustainable development are necessarily taken into account in any decision, and **the High Court judgment correctly recognises that emission creating developments may be properly permitted**."*

It is noted that the turbine is technically capable of operating on alternative gaseous fuels, including biomethane and hydrogen. This is subject to the future decarbonisation of the national gas network, as anticipated in relevant Government and gas system operator policy such as Gas Networks Ireland's (GNI) strategy for decarbonisation '*Pathway to a Net Zero Carbon Network*'

published in 2024 and the '*National Biomethane Strategy*' published by the Government in 2024. However, the operational life sought has been assessed on a conservative, worst-case basis assuming continued operation on natural gas, in order to ensure compliance with national climate policy and legal requirements.

The operational life applied for does not imply any entitlement to operate beyond the period sought. Any proposal to extend the operational life of the plant or to repower it would constitute a separate project and would be subject to the relevant statutory consent requirements and any associated environmental assessment, having regard to the policy and environmental context prevailing at that time.

As described in the MHC letter provided at appendix 2, the competent authority is required to perform its functions in a manner consistent with climate objectives in so far as practicable, alongside other matters of public interest, including the maintenance of security of electricity supply.

3. Site Location & Context

3.1 Site Context

The proposed development site is located in County Galway and is situated approximately 2 kilometres west of Athenry and approximately 17km northeast of Galway city centre (refer to Figure 3.1). Residential development in the surrounding area is dispersed and generally follows the pattern of the local road network.

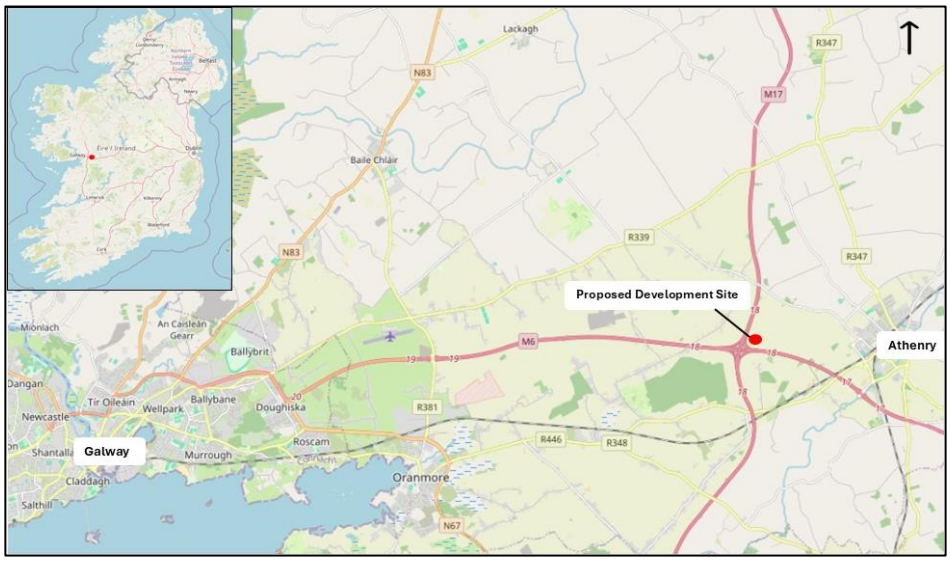


Figure 3.1 Proposed Development Site: Regional Context. Source: MHP GIS

The Proposed Development site is strategically located at the interface of the M18 and M17 motorways, within an established infrastructure corridor characterised by significant transport, gas and electricity transmission infrastructure. The presence of the M18, M17 and nearby M6 motorways, together with existing high-voltage electricity transmission lines and proximity to national gas transmission infrastructure operated by GNI, establishes the area as one already influenced by strategic infrastructure.

Land use in the immediate vicinity is primarily agricultural in character, comprising fields bounded by traditional stone walls and hedgerows. However, the wider surrounding area includes a range of established industrial, infrastructural and commercial land uses. Notable developments include the existing Cashla 220kV Substation (approximately 3.4km to the west), Coshla Quarry (approximately 3.5km to the west), Coffey Civil Engineering (approximately 1.2km to the north), and extensive areas of commercial forestry (approximately 1.2km to the south). The existing Mayo-Galway gas transmission pipeline which runs through the southern portion of the site (see Figure 3.2).

As stated in Section 2.4, the applicant has been allocated a capacity contract in the 2028 / 2029 T-4 Capacity Auction to connect into the existing Cashla 220kV Substation.

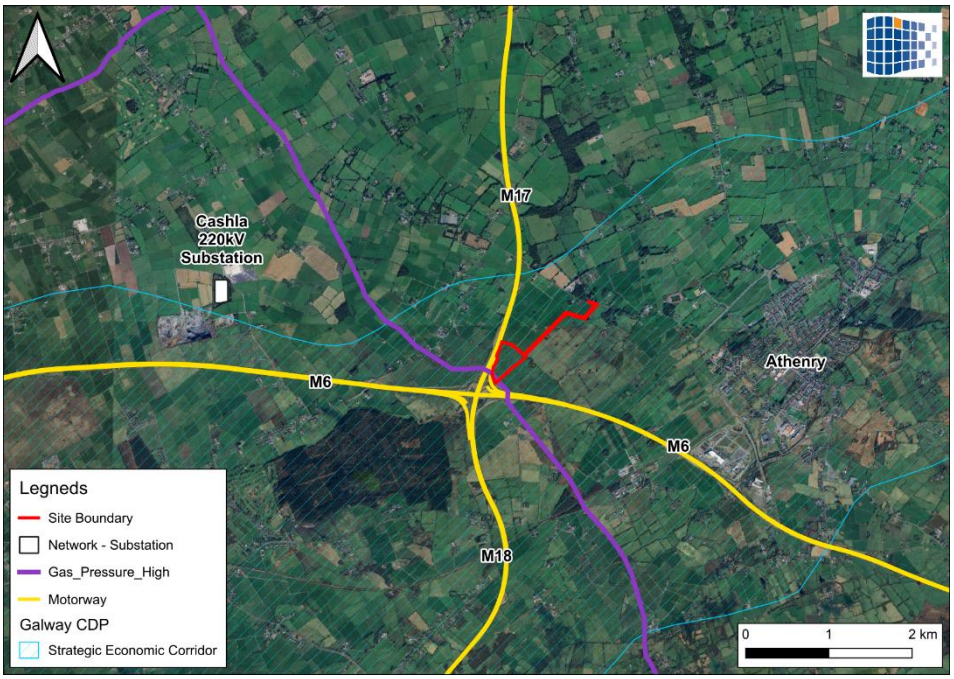


Figure 3.2 Site Context Map: Utilities and Strategic Economic Corridor Designation. Source: MHP

The proximity of the existing Cashla 220kV substation and the presence of the existing Mayo-Galway gas transmission pipeline within the southern portion of the site are important factors in considering the suitability of the site from a strategic location perspective.

3.2 Proposed Development Site

The proposed development site comprises an area of approximately 11.54 hectares and is located within the townlands of Pollnagroagh and Rathmorrissy, Athenry, Co. Galway.

The subject site comprises greenfield lands that are in use for agriculture. There are two derelict agricultural outbuildings within the site. The surrounding land use to the north and east is also primarily agriculture. The site is bounded to the west by the M18 motorway and to the south by the M6 motorway.

The closest residential dwelling is located approximately 850m to the north of the site. There are a number of dwellings situated greater than 1km from the site. Residential dwellings located within 1km to the west of the site are notably separated from the site by the M17 Motorway.

3.2.4 Strategic Economic Corridor

The Proposed Development Site is located within the Oranmore and Athenry Strategic Economic Corridor (SEC), as identified in the Galway County Development Plan 2022–2028 (refer to Figure 3.3). The SEC is designated as a regionally significant location for large-scale enterprise and industrial development and is intended to attract nationally and internationally significant investment.

The Development Plan recognises the corridor as a strategic infrastructure hub benefitting from the convergence of the M6 motorway, the Dublin–Galway rail line, high-capacity gas and electricity transmission networks and advanced telecommunications infrastructure. Policy EL 2 of the Plan commits to reserving and servicing lands within the SEC to international standards in order to support high-value specialist enterprise and regionally significant economic activity.

The siting of the Proposed Development within this Strategic Economic Corridor aligns with the Development Plan's objectives to consolidate infrastructure within established corridors and to support the economic functioning of the wider Galway Metropolitan Area. The provision of strategic energy infrastructure within the SEC will assist in underpinning enterprise activity, supporting employment growth and enhancing regional economic resilience.

3.2.5 Landscape Character

The site consists of grass-based agricultural land with fields enclosed by low stone wall boundaries, characteristic of the surrounding area. It is categorised as the Central Galway Complex Landscape Character Type in the Galway County Development Plan 2022-2028. This Landscape Character Type is recognised as a busy working landscape in which most of Galway's settlement and agriculture, with associated roads and infrastructure, occur. The site is located within an area designated as having a low landscape sensitivity which is defined as unlikely to be adversely affected by change.

A detailed assessment of the landscape and visual effects of the project are set out in Chapter 6 of the accompanying EIAR.

3.2.6 Built Heritage & Archaeology

No known archaeological monuments are located within the proposed development site boundary. The closest archaeological monument is a ringfort (GA084-065) located approximately 100m to the west, separated from the proposed development site by the M17 motorway. This monument was partially excavated under licence no. E004024.

There are no records on the National Inventory of Architectural Heritage and there are no protected structures, as set out within the Galway County Development Plan 20222-2028, located within the proposed development site boundary. The site is not located within an Architectural Conservation Area (ACA) however the closest ACA is Athenry Town Centre located approximately 2km to the east.

The proposed development site was subject of a geophysical survey carried out under licence by Dr. Ger Dowling. Subsequent test excavation of the site was carried out under licence by Rubicon Archaeology Limited. The test excavation found that none of the anomalies identified in the geophysical survey were of archaeological significance. The 'plough trends' recorded by the geophysical survey were found to be the orientation of the underlying limestone bedrock, belonging to the Burren formation. Further

interpretation, significance, and mitigation measures are addressed in the Chapter 13 of the accompanying EIAR.

Figure 3.3: Archaeological Features in surrounding area. Site outlined in red. Source: MHP

3.2.7 Flood Risk

A desktop review of floodinfo.ie indicates that the subject site is not at risk of flooding. A Stage 1 Flood Risk Assessment, prepared by AtkinsRéalis, has been undertaken and can be found enclosed in Appendix 2 of the EIAR.

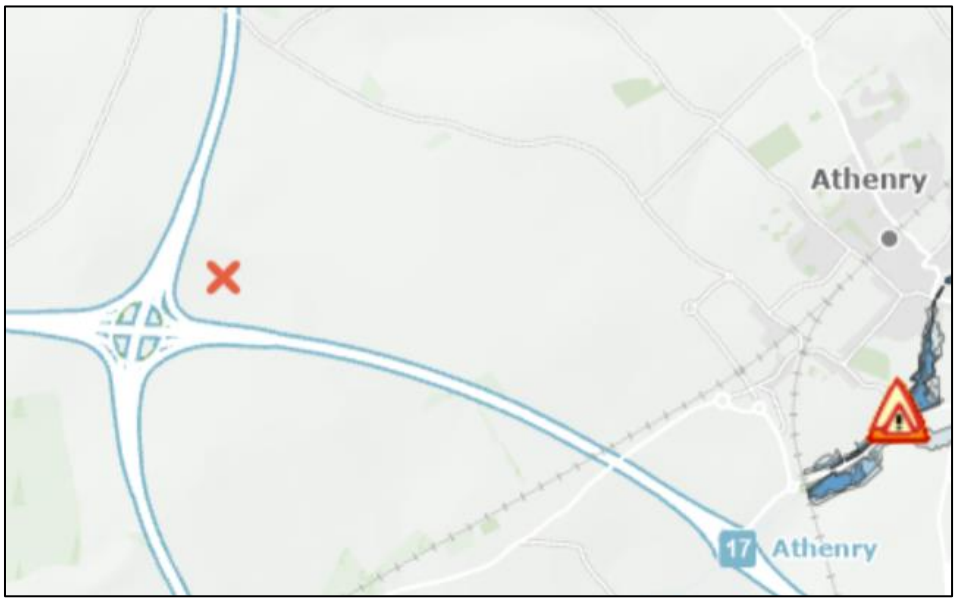


Figure 3.4 Extract from FloodInfo.ie. Site indicated by red X. Source: https://www.floodinfo.ie/map/floodmaps/

4. Planning History

4.1 Proposed Development Site

A desktop review of both Galway County Council and An Coimisiún Pleanála's online planning registers indicates that there is no planning history associated within the proposed development site.

Figure 4.1 and Table 4.1 identify the planning history within the immediate environs of the proposed development site. These permissions reflect the agricultural uses consistent with the existing land use in the area. Planning Ref. 25/61637 also reflects the more infrastructural nature of some of the land-uses in the surrounding area. Energy, Infrastructure and Manufacturing applications in the wider surrounding area are discussed further in Section 4.3.

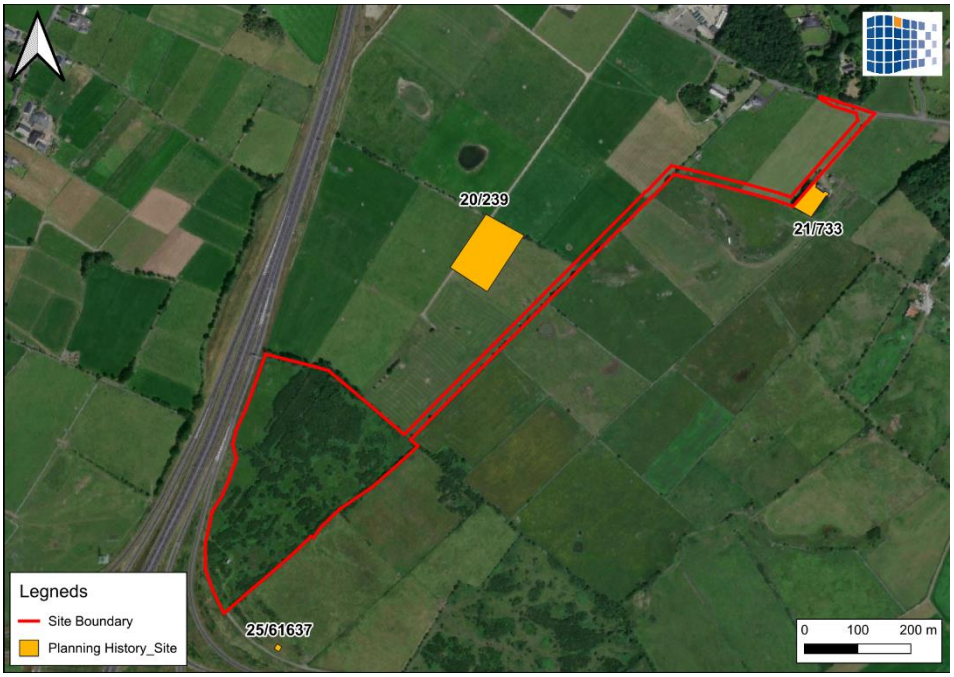


Figure 4.1 Planning History within the immediate environs of the site. Source: MHP

Table 4.1 Planning history within the immediate environs of the site

Planning Ref: 20/239	**Consenting Authority:** Galway County Council
Applicant: Francis & Frank Curran	**Decision:** Granted – August 2020
Location: Pollnagroagh, Athenry, Co. Galway	
Development Description: to construct i) Milking parlour building incorporating holding yard with crush/drafting yard, Office, storage rooms and plant rooms and eternal bulk tank, water tank and meal bin, ii) Cubicle shed with slatted tank iii) Calf shed, iv) Silage pits and all assorted site works; Gross floor space of proposed works 2,171sqm	

Planning Ref: 21/733	**Consenting Authority:** Galway County Council
Applicant: Damien Collins	**Decision:** Granted – August 2021
Location: Pollnagroagh, Athenry, Co. Galway	
Development Description: to construct a 4 bay slatted shed with a calf creep. Gross floor space of proposed works: 292.56 sqm	
Planning Ref: 25/61637	**Consenting Authority:** Galway County Council
Applicant: APW UK WIP	**Decision:** Granted – February 2026
Location: Rathmorrissey, Athenry, Co. Galway, H91 WC1P	
Development Description: to erect a 30m high telecommunications lattice structure together with antennas, dishes and associated telecommunications equipment all enclosed by security fencing	

4.2 Comparable Strategic Infrastructure Development Projects

Having regard to the nature of the proposed development, a review of similar strategic infrastructure development applications nationally has been undertaken.

The review identified a number of relevant proposals, with the most recent being the Shannon LNG Ltd. development in Co. Kerry (Planning Ref. 319566-24) permitted in March 2025. The examination of these cases provides useful guidance for the current proposal. In particular, it highlights the importance of:

- Compliance with European, National and Local Policy on Energy Security and Renewable Energy
- Robust environmental assessments, including climate, air, biodiversity, landscape and visual, noise, water, and traffic and transport impacts;
- Operation compliance with the terms of an EPA IE Licence

Overall, the review demonstrates that peaker power plant developments are recognised for their important role in the net-zero transition and are generally considered acceptable in principle on both brownfield sites and lands designated for infrastructure development. This is relevant to the Cashla Peaker Plant as the site is located within the strategic economic corridor which is designated for enterprise and industrial use.

Table 4.2 Comparable Strategic Infrastructure Development Projects

Planning Ref: 318540	**Consenting Authority:** An Coimisiún Pleanála

Applicant: SSE Generation Ireland Limited	**Decision:** Granted - October 2024
Location: Tarbert Island, Tarbert, Co. Kerry	
Development Description: a 10-year permission for a 350MW Open Cycle Gas Turbine (OCGT)	
Planning Ref: 317810	**Consenting Authority:** An Coimisiún Pleanála
Applicant: EP Energy Development Ltd	**Decision:** Granted – November 2024
Location: Loughrea, Co. Galway	
Development Description: 350MW Open Cycle Gas Turbine (OCGT)	
Planning Ref: 319566	**Consenting Authority:** An Coimisiún Pleanála
Applicant: Shannon LNG Ltd	**Decision:** Granted – March 2025
Location: Kilcolgan Lower and Ralappane between Tarbert and Ballylongford Co. Kerry.	
Development Description: The proposed development will comprise of a 600MW Powerplant, 120MW Battery Energy Storage System, Above Ground Installation and associated ancillary works.	

4.3 Nearby Energy, Infrastructure & Manufacturing Applications

A desktop review of both Galway County Council and An Coimisiún Pleanála's online planning registers was carried out for large-scale developments within the wider surrounding area (within approximately 5km of the subject site), . The review focused on energy, infrastructure and manufacturing planning applications and the relevant planning applications identified are outlined in table 4.3. The review highlights that the surrounding area has a record of supporting large-scale energy, infrastructure and manufacturing developments.

The surrounding area also has a record of permitted development for Strategic Infrastructure Development. In 2016, permission a granted for a Power Supply Development on lands located to the southwest of the subject site (An Bord Pleanála Case reference: VA0020), which included the construction of a 220kV substation and associated works, all located on the townlands of Palmerstown, Toberroe, Rathmorrissy, Caraunduff, and Athenry. This permission has now lapsed. The proposed sub-station was to support a permitted data centre for Apple Distribution Ireland (ref. 15/488, ABP ref. PL07.245518), located to the south-west. An extension of duration of the permission was granted by Galway County Council in 2021, but the

decision was quashed by the High Court. Permission on the nearby lands has therefore now lapsed.

A review of the planning application files highlights the recognition that the Strategic Economic Corridor Designation, which also covers the proposed development site, supports the proposed development of nationally or regionally significant activities in this location. A detailed discussion on the principle of the proposed development is set out in Section 7 of this planning statement.

Table 4.3 Nearby Energy, Infrastructure & Manufacturing Applications

Planning Ref. No.	Description of Development	Decision
17/1538 (Galway County Council)	Soleirtricity applied for permission for a photovoltaic farm at Toberoe and other townlands, Co. Galway.	Refused on 13/06/2018 and appealed to ACP (Case Ref: 302034). Refused by ACP on 18/02/2019
17/1544 (Galway County Council)	Terra Solar II Ltd. applied for a 10-year permission for a photovoltaic farm at Shantallow & Moyveela, Co. Galway.	Granted on 11/06/2018
20/101 (Galway County Council)	C& F Tooling Ltd applied for permission for a wind turbine test site comprising - 1 12m high turbine tower with adjacent 12m high wind measuring mast and 1 20m high turbine tower with adjacent 20m high wind measurement mast.	Granted on 08/06/2020
20/961 (Galway County Council)	Renewable Energy Systems Ltd applied for permission for a period of 5 years to construct and complete a Solar PV Energy and Battery Storage development with a total site area of circa 140.9 Hectares.	Granted on 08/03/2021
310141-21 (An Coimisiún Pleanála)	Shantallow Solar Farm Ltd applied for permission for an electrical substation, 110kV and 33kV compound, underground cable (110kV) installations with associated electrical plant, equipment, control buildings and all associated works.	Granted on 17/12/2021
22/406 (Galway County Council)	Renewable Energy Systems Ltd applied for permission to construct and complete a Solar PV Energy development with a total site area of circa 25 hectares.	Refused on 05/08/2022

22/61105 (Galway County Council)	Renewable Energy Systems Ltd applied for permission to construct and complete a solar PV energy development with a total site area of circa 24.51 hectares,	Granted on 17/04/2023
23/61035 (Galway County Council)	Dexcom International Ltd applied for permission for a manufacturing facility to the south of Athenry town.	Granted on 27/11/2023
25/60220 (Galway County Council)	Coshla Quarry applied for permission for the continued use of the existing quarry.	Granted Permission. Appealed to ACP and granted (Ref: ABP- 322624-25).
25/61412 (Galway County Council)	Gannow Ltd applied for a 10-year permission for a development consisting of 8 no. wind turbines; a permanent 38kV substation compound; permanent underground electrical (38kV) and communications cabling to the existing Cashla Substation; Underground electrical (20/33kV) and communications cabling connecting the wind turbines and meteorological mast; A meteorological mast with a height of 30 metres and all ancillary works and apparatus.	Refused permission. Appealed to ACP (Ref: PL07.500493) and decision pending.

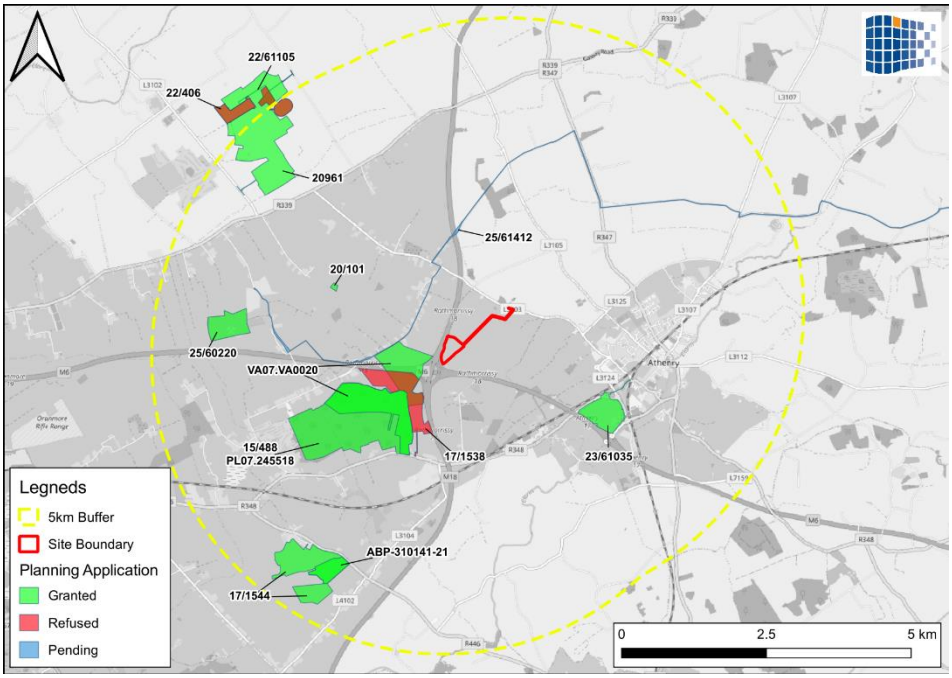


Figure 4.2 Planning History Map Energy, Infrastructure & Manufacturing Applications within 5km of the Proposed Development. Source: MHP

The review of planning history within the wider surrounding area demonstrates that the locality has an established record of accommodating large-scale energy, infrastructure and manufacturing developments, including Strategic Infrastructure Development. While individual applications have been assessed on their merits and some have been refused, the overall pattern of decisions confirms that the area is recognised as suitable, in principle, for regionally and nationally significant infrastructure. The Strategic Economic Corridor designation further reinforces the appropriateness of the location for strategic employment and infrastructure development.

Accordingly, the planning history of the area supports the principle of the Proposed Development in this location.

5. Pre-Planning Consultation

5.1 S.37B Pre-Application Consultation with An Coimisiún Pleanála

Two pre-application consultation meetings were held with the Commission under the provisions of S.37B of the PDA 2000. The primary purpose of the pre-application consultation is to address the issue of whether or not the proposed development constitutes strategic infrastructure for the purposes of the PDA 2000.

The first meeting was held on 20th of January 2025, and the second meeting was held on the 28th of May 2025 under Case Ref: ABP-320975-24 (a copy of the meeting records can be found enclosed with this planning statement at Appendix 1).

The meetings informed the Board's determination that the proposed development constitutes Strategic Infrastructure Development. They also served to clarify the scope and information requirements of the application and to identify key matters to be addressed within the EIAR and accompanying planning documentation. The principal themes arising from these consultations are summarised below.

5.1.1 Open Cycle vs Combined Cycle Technology

The Commission sought clarification on the rationale for the technology chosen for the gas turbine.

Applicant Response

Section 2.5 of this Planning Statement and Chapter 3 Reasonable Alternatives of the accompanying EIAR provide detail on the rationale for the technology chosen in the design of the proposed development. In summary, the open-cycle technology configuration provides a much quicker response time to start and begin generation in comparison to combined-cycle. This fast response time is required to meet the rapid changes in the transmission grid electrical supply and demand imbalance and as such is a critical element in the design of a peaker power plant.

5.1.2 Karst Features

The Commission noted that the area is karst limestone and advised that a full investigation of potential karst features including caves would be required.

Applicant Response

Chapter 11 Lands, Soils and Geology of the accompanying EIAR provides an assessment of potential effects on the lands, soils and geology within the study area, including on the karst landscape. This chapter provides details on the geophysical survey, geotechnical surveys and ground investigation works undertaken as part of the assessment to provide a robust understanding of the geotechnical setting. Section 7.5.4 of this Planning Statement also provides a further discussion on this matter.

5.1.3 Traffic & Haul Routes

The Commission requested that the applicant confirm that the haul routes have the capacity for the weight of the delivery loads and whether the haul route would follow the proposed new access track to the north.

Applicant Response

A comprehensive assessment was undertaken on two haul route options from the Port of Galway to the proposed development site as part the preparation of Chapter 10 Traffic and Transport of the EIAR. A structural review of 9 structures along the two route options was undertaken as part of an Exceptional Abnormal Load (EAL) assessment prepared by AtkinsRéalis (and enclosed in Appendix 2 of the EIAR) for several large components required for the implementation of the project subject of the EIAR.

The results of the analyses indicated that the load effects of the EAL vehicle are less than the design load effects for each structure, apart from one structure which was only relevant to one of the routes. As such, this route option was ruled out and a preferred haul route was identified for the transfer of EAL to the Proposed Development site. The preferred haul route is anticipated to originate at the Port of Galway via Lough Atalia Rd (R339) before connecting directly onto the N6 (which later becomes the M6). It runs on the M6 until Exit 17 (R348) at Athenry, before turning onto Ballygarraun South Rd. From Ballygarraun South Rd, the route runs onto the L3103 off of which access to the proposed main project site is provided. Refer to Chapter 10 Traffic and Transport and CTMP enclosed in Appendix 2 of the EIAR for further detail.

5.1.4 Operational Life

The Commission stated that the operational duration of the application must be consistent with the current Climate Action Plan having regard to the involvement of fossil fuels in the proposed development.

Applicant Response

An operational life up to and including the 31st of December 2050 is proposed for the project. The operational life sought is based on the use of natural gas to fuel the turbine. Section 2.4 of the planning statement provides further detail on the rationale for the operational period sought.

5.1.5 Grid Connection Route

The Commission queried whether a direct route for the underground cabling to the Cashla Substation along the M6 had been considered.

Applicant Response

For clarity, the grid connection route was discussed in detail at the pre-application consultations held under ABP-320975-24. The proposed grid connection route does not form part of this S.37E planning application and will be subject to a separate S.182B planning application submitted to the Commission in due course. However, as the grid connection route forms part of the wider project, the alternative route options for the grid connection

have been assessed and are set out in detail in Chapter 3 Reasonable Alternatives of the EIAR.

5.1.6 Consultation with HSA

The Commission recommended that consultation with the HSA should be undertaken prior to submitting the application.

Applicant Response

Consultation with the HSA was undertaken as part of the preparation of the EIAR and further detail on the consultation can be found in Chapter 1 of the accompanying EIAR.

5.2 Pre-Application Consultation with Galway County Council

A pre-application consultation meeting was held with Galway County Council (GCC) on the 13th of February 2025 to introduce the applicant and design team to the Council. A presentation was provided on the project including detail of the site, the proposed development, the design of the layout and the preliminary planning issues. A copy of the pre-application consultation minutes from the meeting on the 13th February 2025 have been provided in Appendix 3 of this planning statement. Four further meetings were held with the Galway County Council (GCC) roads department and this consultation is summarised in section 5.2.1. below.

The key themes raised by GCC are summarised below:

5.2.7 Community Engagement

GCC highlighted the importance of robust community consultation for the project and recommended that in-person drop-in sessions, recorded engagement and other interactive methods to involve the community were considered as part of the applicant's approach.

Applicant Response

The applicant has undertaken comprehensive public consultation as part of the proposed project and a detailed public consultation report has been prepared and can be found enclosed with this application. The public consultation approach consisted of a combination of public information events, local advertisement of the public information events including posters, leaflet drops and a newspaper advertisement, publication of a non-statutory project website, briefing with elected representatives and press releases to local and regional media outlets.

Three public information events were held between May and December 2025. The first two public information events were held on Wednesday 7th May 2025 and Tuesday 13th May 2025, in the Raheen Woods Hotel, Athenry, Co. Galway to provide information on the project proposals and to invite feedback from local residents, and the wider community.

The third public information event was held on Thursday 4th December 2025 from 1pm to 8pm in the Raheen Woods Hotel, Athenry, Co. Galway to

provide further information to the local community in advance of the submission of the formal planning application. These events provided an opportunity for stakeholders to learn more about the project, and to engage directly with members of the project team. A total of 184 people attended the three public information events.

To raise awareness of the non-statutory public consultation and the public information events, posters were designed and displayed in prominent locations throughout Athenry and the surrounding area. A total of 20 consultation posters were erected on local notice boards in community centres, libraries, civic buildings, and business premises in the Athenry area. Additionally, to ensure local residents and businesses were informed about the public information events, a project leaflet was prepared and distributed to approximately 320 addresses within a 2km – 3km radius of the peaker plant, as well as the proposed underground cable route to the Cashla 220kV substation. A newspaper advertisement was published in the Tuam Herald on Wednesday, 30th March 2025 to further promote the public information events.

To coincide with the leaflet drop and erection of consultation posters, Bord Gáis Energy issued a press release to local and regional media outlets. The press release outlined the purpose of the Cashla Peaker Plant project, its importance in supporting Ireland's energy transition and energy security, and the opportunity for the public to provide feedback.

In advance of the public information events, Bord Gáis Energy's Community Liaison Officer issued invitations to local elected representatives from Galway County Council and TDs from Dáil Éireann to introduce the Cashla Peaker Plant project and offer opportunities for one-to-one engagement.

In addition to the public consultation events, a dedicated, non-statutory website was launched in April 2025 to serve as a central hub for all information relating to the Cashla Peaker Plant project (www.cashlapeakerplant.ie). The website played a key role in broadening the reach of the non-statutory public consultation, particularly for those unable to attend the in-person public information events.

5.2.1 Traffic and Road Access

GCC advised that engagement with TII and the GCC Road Section should be undertaken. It was recommended that access via the entrance near the Coffey Depot be explored as part of the application.

Applicant Response

Extensive engagement with the Galway County Council Road Department was undertaken to inform this planning application and the EIAR. As set out above, four meetings were held with the Roads Department on the 1st April 2025, 28th April 2025, 4th July 2025 and the 10th September 2025. The purpose of these meetings was to discuss the Exceptional Abnormal Loads associated with the project and the proposed haul routes, understand the requirements of GCC Roads Department in terms of traffic management measures and to discuss the routing of the proposed grid connection which forms part of the

project assessed in the EIAR. A summary of the key issues raised during these meetings is provided in Chapter 1 Introduction of the EIAR along with the applicant's response to where these items are addressed in the relevant chapters of the EIAR.

The applicant consulted with TII as part of the preparation of the EIAR and Chapter 1 of the accompanying EIAR provides a summary on the consultation details.

5.2.2 Visual Impact

GCC emphasised the importance of providing detailed visual representations and mitigation strategies for the proposed development. It was recommended that a 5km study area was used for the visual impact assessment with greater emphasis on area within 2km of sensitive receptors. GCC requested that sections were provided of the proposed development and that visuals from different perspectives, such as views from the opposite side of the motorway through the site, were included to provide a clear understanding of the overall scale.

Applicant Response

An assessment of the landscape and visual effects of the project was carried out as part of the EIAR and further detail can be found in Chapter 6 Landscape and Visual of the EIAR. As set out in the 'study assessment and methodology' section for this chapter, the study area includes areas of land within a 3.5km radius of the centre of the proposed main project site which was devised as an area sufficient to enable the potential significant effects of the project on landscape character and views/visual amenity to be analysed. The Zone of Theoretical Visibility (ZTV) or areas of land from which the proposed main project site may be potentially visible were identified and mapped to inform Chapter 6. Details of the ZTV methodology can be found in Chapter 6 however in summary, the results of the study shows that the proposals (in theory) give rise to ZTV area primarily located in a cluster within a 2km radius of the proposed main project site with further areas of potential visibility located outside the primary cluster especially in areas of rising topography to the north of the study area.

Twenty-four viewpoint locations were selected based on professional judgement informed by the Zone of Theoretical Visibility (ZTV) and field surveys, to represent the experience of visual receptors. The viewpoints chosen were selected to represent the different users from a range of directions and distances from the site. Sixteen of these viewpoints were visited for the purpose of preparing verified photomontage visualisation sequences, showing the existing view, Year 1 view, and Year 15 view (where relevant, when screen planting would be approximately 9 m in height), and these are illustrated in Appendix 6. The applicant sought agreement on the viewpoint locations with the planning authority during the preparation of the EIAR, however no feedback was received.

Sections of the Proposed Development have also been prepared as part of the suite of planning drawings accompanying this planning application.

In terms of visual effects, Chapter 6 of the EIAR found that during the construction, operation and decommissioning phases, the Proposed Project will result in a limited number of significant residual visual effects, principally within the immediate context of the main site. Significant adverse effects would be experienced by a small number of nearby receptors where the project would introduce new elements into the landscape and partially alter some existing views. Beyond these areas, residual effects would be slight or neutral and not significant in EIAR terms. During the post decommissioning phase, any adverse effects would become beneficial as all site structures are removed and mitigation screen planting is retained and has matured contributing to an improvement in views.

Further detail on the Landscape and Visual impacts of the Proposed Development are set out in Section 7.5.5. of this planning statement and Chapter 6 of the EIAR.

5.2.3 Environmental Sensitivities

GCC noted the karst landscape in the area and the importance of providing robust mitigation measures in the application including wastewater treatment proposals. An Appropriate Assessment (AA) screening was also requested given the proximity of the site to the Lough Corrib SAC. An evaluation on the risk of explosions was also requested.

Applicant Response

The applicant's response in relation to the Karst landscape is discussed further in Section 7.5.4. of this Planning Statement and is to be read in conjunction with Chapter 11 Lands and Soils of the EIAR.

Detail on the wastewater treatment proposals are set out in the Engineering Planning Report provided in Appendix 2 of the EIAR. In summary, the proposed wastewater treatment plant (WWTP) will be a package domestic plant that will discharge to underground storage tanks which will be emptied by tanker once a week and taken to a nearby licenced WWTP for disposal. The onsite WWTP will prevent septicity occurring in the storage tanks during collection times.

An AA Screening was undertaken by AtkinsRéalis as part of this planning application. Based on the findings of the AA Screening, a Stage 2 AA was determined to be required and a copy of the NIS can be found enclosed with this planning application. The NIS concluded that there will be no residual impacts and that the Proposed Project, alone or in combination with other plans and projects, will not have an adverse effect on any European sites.

As set out in the development description, the Proposed Development comprises a lower tier COMAH establishment. Chapter 15 Major Accidents and Disaster of the accompanying EIAR evaluates the risk of major accidents and disasters for the Proposed Development across construction, operation and decommissioning. The assessment concludes that, after implementation of the committed design, operational and emergency measures no significant adverse off-site effects from major accidents or disasters are predicted. Refer to Chapter 15 of the EIAR for further detail.

5.2.4 Decommissioning

GCC sought clarification regarding decommissioning plans for the proposed development.

Applicant Response

As set out earlier, an operational life up to and including the 31st December 2050 is proposed for the development. Chapter 2 Project Description of the accompanying EIAR provides an overview of the decommissioning phase for the project and outline the decommissioning process. Additionally, Under IE Licence requirements BGE will be required to prepare and maintain an Environmental Liabilities Risk Assessment (ELRA) and/or a Closure, Restoration and Aftercare Management Plan (CRAMP) for the proposed development.

In respect of the AGI element of the proposed development, this infrastructure will be owned and operated by GNI who would be responsible for the future intentions of this facility if the Cashla Peaker Plant were decommissioned. The lifespan of the AGI is not defined but it is anticipated that it will be maintained, with periodic upgrading undertaken over a long lifetime to meet future demand and upgrade in technology. The costs associated with the decommissioning, removal and disposal of the asset will be met by GNI.

5.2.5 Emissions

A discussion was held in regard to assessing the potential impacts of nitrogen oxides on any nearby SACs.

Applicant Response

Chapter 7 Air Quality of the EIAR assesses the likely air quality impacts associated with the proposed development. The impact of NOx emissions from the proposed development on ambient ground level concentrations was assessed using AERMOD within European sites, NHAs, and pNHAs. Reference should be made to Chapter 7 for further detail on the assessment methodology however in summary the chapter concludes that effect of NOX, emissions are considered to be not significant.

5.3 Galway City Council

Non-statutory pre-application consultation was undertaken with Galway Citty Council's roads authority to discuss the proposed haul route and associated abnormal loads. The haul route for the abnormal loads are anticipated to start at the Port of Galway and traverses through Galway City Council's jurisdiction before running into Galway County Council's jurisdiction.

It was noted that Exceptional Abnormal Loads (EAL) require a formal permitting process distinct from the planning application consent process. The meeting clarified the key requirements for obtaining an EAL permit, including the need for robust commitments such as engaging a structural engineer who will provide indemnities and assume insurance risk related to bridge crossings.

The Roads Authority emphasised the importance of demonstrating that the bridge structures and culverts along the transport route can safely accommodate the proposed loads, and that any necessary approvals from Transport Infrastructure Ireland (TII) will be obtained.

The applicant has acknowledged these requirements and will undertake the necessary detailed structural assessments and statutory permitting procedures prior to the first abnormal load delivery. The consultation process has therefore confirmed a clear regulatory pathway for the delivery of the turbine and generator components, subject to compliance with the abnormal load permitting regime and associated technical requirements.

6. Policy and Legal Context

6.1 European Policy and Legal Context

Current European energy policy places strong emphasis on maintaining security of electricity supply alongside decarbonisation. As renewable generation capacity increases, the electricity system becomes more dependent on assets capable of responding quickly to fluctuations in demand and variable generation.

European policy recognises that flexible and dispatchable generation continues to play a role in safeguarding system resilience, particularly during periods of extreme weather, seasonal peak demand, and reduced renewable output. Infrastructure designed to operate at limited load factors and provide rapid response capability is therefore consistent with the objectives of ensuring a stable and reliable energy system during the transition to climate neutrality.

The recognition of transitional infrastructure reflects the understanding that the pathway to climate neutrality will require phased change, during which existing and new assets may provide essential support functions while longer-term solutions such as large-scale energy storage and renewable overcapacity continue to develop.

6.1.1 Renewable Energy Directive (RED II & III) - 2018

The Renewable Energy Directive (Directive (EU) 2018/2001) (RED II) entered into force in 2018 as part of the '*Clean energy for all Europeans*' package aimed at maintaining the EU's status as a global leader in renewables and, more broadly, helping it to meet its emissions reduction commitments under the Paris Agreement.[3] It was subsequently amended by Directive (EU) 2023/2413 (RED III) in 2023 which set an overall binding EU-wide target of at least 42.5% renewable energy consumption by 2030, but with an aspirational goal of 45%.

While the REDIII focuses on increasing the proportion of energy generated from renewable sources, it also operates within a wider policy framework that recognises the need for electricity systems capable of integrating variable renewable generation. Infrastructure that supports system flexibility and reliability during periods of low renewable output or peak demand plays an enabling role in facilitating the increased deployment of renewable energy envisaged by RED III.

6.1.2 EU Green Deal – 2019

The European Green Deal, set out in the communication from the Commission of 11 December 2019 (the 'European Green Deal'), Regulation (EU) 2021/1119 of the European Parliament and of the Council, established the objective of climate neutrality in the Union by 2050 and an intermediate

[3] The Paris Agreement is a 2015 international treaty under the UNFCCC aiming to limit global warming to well below 2°C, while pursuing efforts to limit it to 1.5°C.

target of a reduction of net greenhouse gas emissions by at least 55% compared to 1990 levels by 2030.

The Union's climate neutrality objective requires an increase in energy efficiency and significantly higher shares of energy from renewable sources.

In pursuing these objectives, European policy recognises that the transition to a climate-neutral energy system must be achieved while maintaining security of supply and system resilience. Infrastructure that supports efficient system operation and manages peak demand during periods of variable renewable generation is therefore consistent with the objectives of the European Green Deal.

6.1.3 European Climate Law – 2021

The European Climate Law (Regulation (EU) 2021/1119) came into effect in July 2021, as part of the European Green Deal framework aimed at making the European Union climate-neutral by 2050.

The regulation legally binds the European Union as a whole to achieve climate neutrality by 2050, setting an intermediate target of at least a 55% net reduction in greenhouse gas emissions by 2030 relative to 1990 levels.

It establishes a legal obligation for Member States to ensure that their national legislation, policies, and measures are consistent with achieving the Union's 2030 and 2050 climate targets.

In this context, European climate policy recognises that measures to reduce greenhouse gas emissions must be accompanied by provisions that ensure the continued operability and resilience of the electricity system. Energy infrastructure that supports reliable system operation during periods of peak demand or reduced renewable generation is compatible with the objectives of the European Climate Law, provided it operates within the broader framework of emissions reduction and system transition.

6.1.4 REPowerEU

REPowerEU is a plan published by the European Commission in 2022 to phase out Europe's reliance on Russian fossil fuels by 2030. It aims to achieve this by accelerating clean energy, diversifying energy supplies, implementing energy saving measures and providing financial support.

REPowerEU places strong emphasis on improving the resilience and security of Europe's energy system through diversification of supply and the maintenance of reliable electricity infrastructure. Within this context, energy assets that support system flexibility and provide dependable capacity during periods of supply constraint or peak demand are consistent with the objectives of strengthening energy security during the transition to a lower-carbon energy system.

6.1.5 EU Electricity Market Design Reform (2024–2026)

The EU Electricity Market Design Reform, adopted in 2024 and implemented across Member States from 2025 onwards, updates the regulatory framework governing electricity markets to reflect higher penetrations of

variable renewable energy. The reform places increased emphasis on security of supply, system adequacy, and flexibility, recognising that dispatchable capacity remains necessary to maintain grid stability during periods of peak demand and low renewable output.

The reformed framework supports the continued role of capacity mechanisms and flexible generation assets as part of a resilient energy system, particularly during the transition to a climate-neutral electricity sector. This policy context is relevant to the consideration of infrastructure that provides short-duration, low-load-factor generation in support of renewable integration.

6.1.6 Fit for 55 – Implementation Phase

The Fit for 55 legislative framework represents the primary mechanism for delivering the European Climate Law's binding emissions reduction targets. By 2026, the majority of Fit for 55 measures have moved from policy adoption into implementation at Member State level, including reforms affecting energy markets, emissions trading, and renewable deployment.

The framework acknowledges that achieving net-zero greenhouse gas emissions requires both rapid expansion of renewable energy and measures to ensure electricity system resilience and reliability during the transition. Within this context, energy infrastructure that supports system flexibility and peak demand management is recognised as compatible with the European Union's decarbonisation objectives.

6.2 National Policy and Legal Context

National energy and climate policy in Ireland is framed by the statutory commitment to achieve significant greenhouse gas emissions reductions while ensuring the continued security and resilience of the electricity system. The following sections set out the principal national legislative, policy, and strategic documents relevant to the delivery of a secure, flexible, and low-carbon electricity system during the transition to climate neutrality.

6.2.1 Climate Action and Low carbon Development (Amendment) Act - 2021

The Climate Action and Low Carbon Development (Amendment) Act 2021 was introduced to amend the Climate Action and Low Carbon Development Act 2015 to strengthen Ireland's legislative framework for climate action in response to both domestic climate policy objectives and international obligations under European and international climate agreements, including the European Climate Law (Regulation (EU) 2021/1119).

The 2021 Act legally commits Ireland to achieving a 51% reduction in greenhouse gas emissions by 2030 (relative to 2018 levels) and to reaching net-zero emissions no later than 2050.

In this context, the Act recognises that the achievement of national emissions reduction targets must be accompanied by measures that ensure the continued security and operability of the electricity system during the transition to climate neutrality.

6.2.2 Policy Statement on Security of Electricity Supply - 2021

The Policy Statement on Security of Electricity Supply sets out a number of updates to national policy in the context of the Programme for Government commitments relevant to the electricity sector, planning authorities and developers. It addresses and responds to challenges, including rising electricity demand, the planned retirement of older dispatchable generation capacity, and delays in the delivery of new flexible generation projects.

The statement confirms government approval for the development of new conventional generation (including gas-fired and gasoil/distillate-fired generation) as a national priority and should be permitted and supported in order to ensure security of electricity supply and support the growth of renewable electricity generation. The Government's approach to electricity security, as set out in the 2021 Policy Statement, has since been reaffirmed and expanded upon in the broader National Energy Security Framework (2022).

The policy statement therefore confirms that the provision of new dispatchable electricity generation capacity forms part of the Government's approach to maintaining security of supply while supporting the growth of renewable electricity generation.

6.2.3 National Energy and Climate Plan 2021 – 2030

National Energy and Climate Plans (NECPs) are the framework within which European Union Member States must set out their climate and energy objectives, targets, policies, and measures to the European Commission. Energy Security is a key priority in the NECP and the plan recognises that continuing secure supply of gas is crucial to support a highly renewable electricity system given the variability of wind and solar energy. It is a specific objectives in the NECP to ensure that there is sufficient flexibility in the energy system to maintain energy security of supply and facilitate the integration and transition to clean energy sources in the most cost-effective way.

6.2.4 National Energy Security Framework - 2022

The National Energy Security Framework, published by the Department of the Environment, Climate and Communications, sets out Ireland's response to energy security challenges arising from the war in Ukraine and broader market volatility. It complements existing national and energy policies, and establishes immediate, medium, and long-term, actions aimed at safeguarding the security of energy supply while advancing the energy transition.

While the Framework prioritises reducing dependency on imported fossil fuels through accelerated and renewable energy deployment and energy efficiency, it acknowledges that oil, gas, and coal supplies will continue to be required in the short-to medium-term to maintain energy security.

In this context, the framework recognises the critical role of natural gas in electricity generation, and the importance of maintaining sufficient

dispatchable generation capacity and backup fuel capabilities during the transition period.

The framework recognises that maintaining sufficient dispatchable generation capacity, including gas-fired plant, remains necessary to safeguard energy security during the transition to a lower-carbon energy system.

6.2.5 Energy Security in Ireland to 2030

Ireland is currently one of the most energy import dependent countries in the EU, having imported 77% of its energy supply in 2021 and 82% in 2022. Energy Security in Ireland to 2030 outlines a new strategy to achieve energy security in Ireland for this decade, while ensuring a sustainable transition to a carbon neutral energy system by 2050. The strategy outlines areas where action is required to fulfil this ambition including the introduction of gas demand flexibility measures. Demand-side mechanisms developed in the gas sector will not only reduce system stress when needed, but it can also ensure Ireland is efficiently using its gas infrastructure – an important component of meeting national emissions ambitions.

The strategy also aims to ensure that all of the required policy enablers are in place for a secure transition to a renewables-led electricity sector including to complete the implementation of the CRU Security of Supply Programme. The CRU-led Security of Supply Programme includes the procurement of at least 2GW of new flexible, enduring, capacity through market mechanisms by 2030 as one of its key actions.

In this regard, the strategy identifies flexible generation and demand-side measures as key components of ensuring a secure and resilient electricity system while progressing towards a renewables-led energy mix.

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

This strategy document is the first Long-term Climate Action Strategy prepared under the Climate Action and Low Carbon Development Act 2021. This strategy recognises that in the transition to a climate neutral future, the pathway to decarbonisation must be underpinned by affordability and security in how we access and use energy, which includes the requirement for new gas-fired generation as back-up.

6.2.7 EirGrid Generation Capacity Statement

EirGrid's most recent Generation Capacity Statement identifies ongoing and forecast challenges in maintaining adequate electricity generation capacity to meet peak demand and ensure system security, particularly in the context of increasing renewable penetration, rising electricity demand, and the planned retirement of older thermal plant. The statement highlights the continued requirement for new flexible and dispatchable generation capacity to address periods of system stress and to support the reliable operation of the electricity system.

In this context, the delivery of additional flexible generation capacity is identified as a necessary component of maintaining security of supply over the coming decade, complementing renewable energy deployment and other system flexibility measures.

6.2.8 Climate Action Plan – 2025

The Climate Action Plan 2025 (CAP25), approved by the Irish Government on 15 April 2025, is the third statutory update under the Climate Action and Low Carbon Development (Amendment) Act 2021.

It reaffirms the national commitment to a 51% reduction in greenhouse gas emissions by 2030 (relative to 2018 levels) and climate neutrality by 2050. The Plan emphasises accelerated implementation across key sectors and highlights the need for flexible and resilient electricity system to support increased renewable generation. The delivery of at least 2GW of New Flexible Gas Plant by 2030 is included as a national target within the CAP 25 alongside other renewable energy generation targets, recognising the role that flexible gas plants have to play in supporting a flexible and resilient electricity system.

The Plan therefore acknowledges that the delivery of new flexible generation capacity forms part of the policy pathway to achieving national climate targets while maintaining a resilient electricity system.

6.2.9 Revised National Planning Framework - 2025

The Revised National Planning Framework (NPF), approved by Government in April 2025, updates Ireland's long-term, spatial strategy to reflect emerging challenges including climate action targets, energy security, and infrastructure resilience. The revised framework was prepared in the context of evolving national commitments to climate neutrality by 2050, increased electricity demand projections, and heightened risks to energy supply arising from international geopolitical developments.

It places stronger emphasis on ensuring the resilience and security of Ireland's energy systems, recognising the need for fuel diversification, enhanced system flexibility, and investment in critical infrastructure.

National Strategic Outcome (NSO 8) 'Transition to a Low Carbon and Climate Resilient Society' is the main NSO relevant to the proposed development. It recognises the need to:

> *Reinforce the distribution and transmission network to facilitate planned growth and distribution of a more renewables focused source of energy across the major demand centres.*

Chapter 9 of the revised NPF 'Climate Transition and Our Environment' recognises the need to accelerate action on climate change to enable our transition to a climate neutral energy future. In this regard National Policy Objective 69 seeks to:

> *Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy, mitigation and adaptation objectives, as well as targets for greenhouse*

gas emissions reductions as expressed in the most recently adopted carbon budgets.

The framework acknowledges the transitional role of natural gas in supporting energy security. On page 132, it states:

Gas will continue to play a key role to support the secure transition to an energy system, based on electrification and greatly increased renewables penetration.

6.2.10 National Development Plan 2021– 2030

The National Development Plan (NDP) was published by the Government of Ireland as the capital investment strategy underpinning Project Ireland 2040. It was prepared to align public infrastructure investment with the objectives of the NPF, including balanced regional development, climate action and economic resilience.

The NDP commits to over €165 billion in capital investment across sectors, with major funding allocated to energy infrastructure, including the electricity grid, renewable energy integration, and system resilience measures. The NDP outlines that ensuring continued security of energy supply is considered a priority at national level and within the overarching EU policy framework in which the Irish energy markets operate. In the short-to-medium-term, conventional (mainly gas-fired) electricity generation capacity is noted as being critical to support the operation of the electricity system and to provide security of supply for when variable generation (wind/solar) is not sufficient to meet demand. In this regard, the NDP states that circa 2 GW of new conventional electricity generation capacity will need to be delivered over the course of the coming decade with much of this needed by mid-decade.

The NDP was reviewed in 2025 and features annual sectoral capital allocations from 2026-2030 and overall capital expenditure ceilings to 2035. The review process and substantive capital allocations provided within the document were driven by a number of key factors, including climate. The revised document acknowledges that to achieve the targets set out in the Climate Action and Low Carbon Development (Amendment) Act 2021 and the policies and measures set out in the CAP 2025, significant capital investment is required. Importantly, it also notes that public investment alone will not be sufficient to reach these goals and that private investment is required along with the use of other key policy levers, such as well-designed regulatory measures, taxation, education and behavioural change programmes to further climate action.

6.3 Regional Policy Context

Regional policy provides the spatial and strategic framework through which national planning and energy objectives are implemented at regional level. The following section outlines the relevant regional policy context, the Regional Spatial and Economic Strategy, which supports the delivery of critical energy infrastructure and the transition to a low-carbon and resilient energy system

6.3.1 Regional Spatial and Economic Strategy (RSES) for the Northern and Western Region 2020 – 2032

The Regional Spatial and Economic Strategies (RSES) were prepared by the regional assemblies to support the implementation of the NPF and the economic policies and objectives of Government by providing a long-term strategic planning and economic framework for the development of the region. It seeks to determine at a regional scale how best to achieve the shared goals set out in the National Strategic Outcomes of the NPF.

The RSES for the Northern and Western Region 2020-2032 includes several policy measures aimed at supporting the development and reinforcement of the electricity grid, the expansion delivery and expansion of natural gas infrastructure throughout the region, promoting the transition to a low-carbon economy, and enabling the transfer of electricity generated from renewable sources. These are outlined in Regional Policy Objectives (RPOs) 8.1, 8.3, 8.4 and 8.6:

> *RPO 8.1 - The Assembly support the development of a safe, secure and reliable electricity network and the transition towards a low carbon economy centred on energy efficiency and the growth projects outlined and described in this strategy*
>
> *RPO 8.3 - The Assembly support the necessary integration of the transmission network requirements to allow linkages with renewable energy proposals at all levels to the electricity transmission grid in a sustainable and timely manner.*
>
> *RPO 8.6 Facilitate the delivery and expansion of natural gas infrastructure throughout the region and have regard to the location of existing gas infrastructure in assessing potential developments.*

Collectively, these Regional Policy Objectives support the provision of electricity and gas infrastructure required to ensure a secure, resilient, and low-carbon energy system at regional scale.

6.4 Local Planning Context

The local planning context is set by the Galway County Development Plan 2022–2028, which provides the statutory framework for land use, infrastructure delivery, environmental protection, and climate action at county level. The following section outlines the relevant provisions of the Development Plan that apply to the site and to the assessment of strategic energy and infrastructure development.

6.4.1 Galway County Development Plan 2022 – 2028

The Galway County Development Plan (CDP) is informed by the projected population and economic growth targets set out in the National Planning Framework (NPF) and the Northern and Western Regional Spatial and Economic Strategy (RSES). It reflects the county's ambition for sustainable development by aligning growth with the delivery of essential infrastructure.

The plan also aligns with the Galway County Council Local Authority Renewable Energy Strategy (LARES) 2022, which recognises Galway's significant contribution to Ireland's renewable energy generation - producing approximately 11% of national wind energy capacity. Both the CDP and LARES acknowledge the key role that the gas network plays as part of the supporting infrastructure for renewable energy developments and the CDP states that "*gas will play an important part of Ireland's energy economy for the foreseeable future.*"

Chapter 5: Economic Development, Enterprise and Retail Development

Chapter 5 of the CDP identifies key locations for employment and enterprise growth alongside its network of towns and villages. The overarching policy objective for this chapter is:

> *To develop and build on the economic strengths and assets of the county as a thriving, competitive and attractive place for a range of sectors to locate, based on the principles of a well-established economic base that is highly appealing to both investors and employees.*

Central to this strategy is the Oranmore Strategic Economic Corridor (SEC), stretching from Oranmore to Athenry in which the proposed development is located (refer to Figure 3.2 of this planning statement).

Recognised in the Regional Spatial and Economic Strategy (RSES), Galway is positioned for compact, connected and inclusive growth as a competitive location for both people and businesses. The Plan notes that the SEC is aligned with the Galway – Dublin railway and the M6 motorway and benefits from high accessibility and established infrastructure, making it a prime area for investment.

The following policy objective relates to the Strategic Economic Corridor Designation:

> *EL 2 Strategic Economic Corridor: In relation to the Strategic Economic Corridor the Planning Authority will take steps to:*
>
> - *Reserve lands to support nationally and regionally significant activities and to attract specialist enterprise development that is large scale of high value;*
> - *Facilitate opportunities for employment and technology-based uses;*
> - *Ensure that development is compatible with the enhancement, preservation and protection of the environment and cultural resources recognised within the corridor;*
> - *Identify sites of adequate size and location to accommodate necessary infrastructure or support activities which would not be appropriate in proximity to centres of population or sensitive environments or environmentally sensitive economic activities;..*

Chapter 6: Transport and Movement

Chapter 6 of the CDP recognises the critical role of national roads which serve as key elements of the county's strategic transport network. These roads support regional accessibility, economic development, and connections to the wider Atlantic Economic Corridor and Dublin. Policy objectives for national roads aim to protect the carrying capacity, safety and strategic function of these corridors by ensuring development proposals do not compromise their performance.

The following policy objectives are of relevance to the proposal:

> *NR 1 Protection of Strategic Roads: To protect the strategic transport function of national roads and associated national road junctions, including motorways through the implementation of the 'Spatial Planning and National Roads Guidelines for Planning Authorities' DECLG, (2012) and the Trans-European Networks (TEN-T) Regulations.*
>
> *NR 3: Traffic and Transport Assessment (TTA) and Road Safety Audit (RSA): Require all applications for significant development proposals which have the potential to impact on the National Road Network to be accompanied by a Traffic and Transport Assessment (TTA) and Road Safety Audit (RSA), carried out by suitably competent persons, in accordance with the TII's Traffic and Transport Assessment Guidelines and TII Publications (Standard) GE-STY-01024 (Road Safety Audit) respectively.*
>
> *NNR 2 Safeguard Regional and Local Roads: To safeguard the carrying capacity and safety of the County's regional and local road network.*

Chapter 7: Infrastructure, Utilities and Environmental Protection

Chapter 7 of the CDP sets out the strategic objectives for the sustainable provision and enhancement of infrastructure and utility services across the county. Chapter 7 of the CDP has the overarching objective to:

> *"support and encourage investment and improvement in utilities, water, wastewater, electricity and gas infrastructure and support the development and enhancement of digital infrastructure."*

The CDP further recognises that

> *"a strong electricity infrastructure and transmission grid is essential for the county in order to attract and retain high-tech industrial investment, to ensure competitive energy supplies, to achieve balanced development, to reduce dependency on fossil fuels, and to achieve climate change targets".*

The following policy objectives are relevant to the proposed development:

> *EG 1 Enhancement of Electricity Infrastructure: Support and promote the sustainable improvement and expansion of the electricity transmission and distribution network that supply the County, while taking into consideration landscape, residential, amenity and environmental considerations.*

EG 3 Power Capacity: To support and liaise with statutory and other energy providers in relation to power generation, in order to ensure adequate power capacity for the existing and future needs of the County.

The CDP recognises the importance of maintaining high air quality standards to protect public health and the environment. Poor air quality is linked to significant environmental and health impacts, particularly in built-up areas and near major transport routes. The Council acknowledges the role of the Environmental Protection Agency as the statutory body responsible for monitoring air quality and commits to collaboration with the EPA to ensure compliance with national and EU air quality standards.

The following policy objectives are relevant to air quality management within the County:

AQ 1 Ambient Air Quality: To promote the preservation of best ambient air quality compatible with sustainable development in accordance with the EU Ambient Air Quality and Cleaner Air for Europe (CAFÉ) Directive (2008/50/EC) and ensure that all air emissions associated with new developments are within Environmental Quality Standards as set out in the Air Quality Standards Regulations 2011 (SI No. 180 of 2011) (or any updated/superseding documents).

AQ 2 Assessment of Air Quality: To require developments which would have the potential to have adverse impacts on air quality to carry out assessments of the impact of the development on air quality.

AQ 3 Air Quality Mitigation Measures: To require the use of appropriate mitigation measures such as dust dampeners to minimise the potential impacts of developments on air quality

The CDP recognises that environmental noise is a significant issue that can impact human health, quality of life, and the natural environment. Galway County Council has prepared the Galway County Council Noise Action Plan 2019–2023, in accordance with its statutory obligations under the Environmental Noise Regulations. The Action Plan focuses on major transport corridors, but the CDP also sets out general policy objectives to ensure new developments mitigate potential noise impacts at the planning and operational stages.

The following noise-related policies are of relevance:

NP 1 Galway County Council Noise Action Plan 2019-2023: To implement the Galway County Council Noise Action Plan 2019-2023 (and any subsequent Plan) in order to avoid, prevent and reduce the harmful effects, including annoyance, due to environmental noise exposure.

NP 2 Developments within Noise Maps (Noise Action Plan 2019-2023): To require that where new developments are proposed within the noise limits of the noise maps for the designated sections of roads in the County, appropriate mitigation measures are undertaken so as to prevent harmful effects from environmental noise.

NP 3 Noise Impact Assessments: To require an assessment of impact of the development on noise levels, having regard to the provisions of the Environmental Protection Agency Acts 1992 and 2003 and the EPA Noise Regulations 1994 when assessing planning application.

NP 4 Noise Pollution and Regulation: Restrict development proposals causing noise pollution in excess of best practice standards and regulate and control activities likely to give rise to excessive noise, other than those activities which are regulated by the EPA.

NP 5 Noise Mitigation Measures Require activities likely to give rise to excessive noise to install noise mitigation measures and monitors. The provision of a noise audit may be required where appropriate.

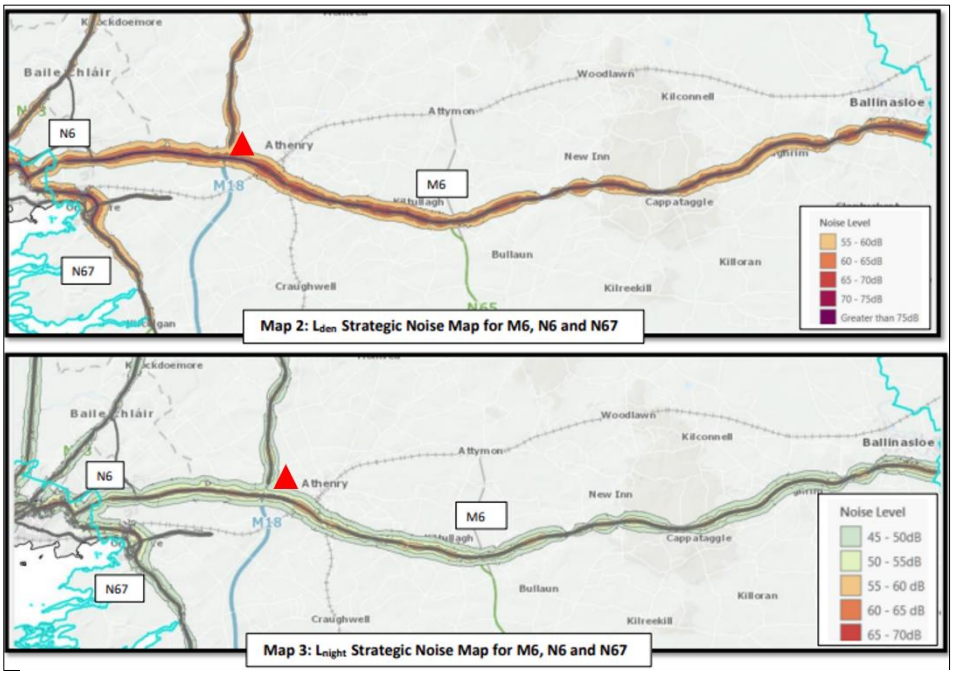


Figure 6-6.1: Strategic Noise Maps. Map source: Galway County Council Noise Action Plan 2024 - 2028. Approximate site location identified by red icon.

Chapter 7 of the CDP recognises the importance of controlling light pollution in order to protect residential amenity, nature conservation, visual quality, road safety, and energy efficiency. While acknowledging the necessity of artificial lighting for safety and security, the Plan places emphasis on minimising excessive light spillage and maintaining dark skies in rural areas. The following policy objectives are of relevance:

LP 1 Lighting Schemes: To require that all developments shall ensure lighting schemes are designed so that excessive light spillage is minimised to ensure light pollution in the surrounding environment including residential amenity, wildlife and near public roads is limited. Such lighting schemes shall be submitted and agreed with the Planning Authority.

LP 2 Lighting and Climate Action: To require the use of low energy LED (or equivalent) lighting in support of Climate Action.

LP 3 Dark Skies: To encourage the maintenance of dark skies in rural areas and to limit light pollution in urban and rural areas.

Chapter 7 of the CDP addresses the need to manage risks associated with the presence of hazardous substances. The European Communities (Control of Major Accident Hazards Involving Dangerous Substances) Regulations 2006, which transpose the Seveso II Directive (96/82/EC) into Irish law, provide the legislative basis for this. These regulations aim to prevent major accidents and limit their consequences by guiding the siting of new establishments, modifications to existing facilities, and development in the vicinity of such sites.

The following policy objectives are of relevance to the proposed development:

MAS 2 Soil Protection Measures: To require that, the siting of new establishments, or modification of existing establishments classified under the Seveso II Directive, and new development in the vicinity of existing establishments shall take into account the need to prevent major accidents involving hazardous substances and safeguard both the public and the environment.

MAS 3 SEVESO III Sites: Take into account the provisions of the Major Accidents Directive, relating to the control of major accident hazards involving dangerous substances, and the recommendations of the Health and Safety Authority in the assessment of all planning applications located within the consultation distance of such sites.

Chapter 8 Tourism and Landscape

Chapter 8 of the CDP highlights the importance of Galway's Landscapes and recognises them as one of the key attributes within the County. The chapter notes that the Council aims to support sustainable development at appropriate locations throughout the county whilst also protecting the landscapes from inappropriate developments.

The site lies within the Central Galway Complex Landscape designation which has a low-class sensitivity attributed to it. The low sensitivity is noted in the CDP as being unlikely to be adversely affected by change. The following policy objects are relevant to the proposed development:

LCM 2 Landscape Sensitivity Classification: The Planning Authority shall have regard to the landscape sensitivity classification of sites in the consideration of any significant development proposals and, where necessary, require a Landscape/Visual Impact Assessment to accompany such proposals. This shall be balanced against the need to develop key strategic infrastructure to meet the strategic aims of the plan.

LCM 4 Open/Unfenced Landscape: Preserve the status of traditionally open/unfenced landscape. The merits of each case will be considered in light of landscape sensitivity ratings and views of amenity importance.

Chapter 10 Natural Heritage, Biodiversity and Green/Blue Infrastructure

Chapter 10 of the CDP sets out how the Plan will contribute towards the protection and enhancement of biodiversity and natural heritage including sites designated on a national and EU Level and protected species and habitats outside of designated ecological sites within the County.

The following Policy Objectives are relevant to the proposed development:

> *NHB 2 European Sites and Appropriate Assessment: To implement Article 6 of the Habitats Directive and to ensure that Appropriate Assessment is carried out in relation to works, plans and projects likely to impact on European sites (SACs and SPAs), whether directly or indirectly or in combination with any other plan(s) or project(s). All assessments must be in compliance with the European Communities (Birds and Natural Habitats) Regulations 2011. All such projects and plans will also be required to comply with statutory Environmental Impact Assessment requirements where relevant.*
>
> *NHB 4 Ecological Appraisal of Biodiversity: Ensure, where appropriate, the protection and conservation of areas, sites, species and ecological/networks of biodiversity value outside designated sites. Where appropriate require an ecological appraisal, for development not directly connected with or necessary to the management of European Sites, or a proposed European Site and which are likely to have significant effects on that site either individually or cumulatively.*
>
> *NHB 9 Protection of Bats and Bats Habitats: Seek to protect bats and their roosts, their feeding areas, flight paths and commuting routes. Ensure that development proposals in areas which are potentially important for bats, including areas of woodland, linear features such as hedgerows, stonewalls, watercourses and associated riparian vegetation which may provide migratory/foraging uses shall be subject to suitable assessment for potential impacts on bats. This will include an assessment of the cumulative loss of habitat or the impact on bat populations and activity in the area and may include a specific bat survey. Assessments shall be carried out by a suitably qualified professional and where development is likely to result in significant adverse effects on bat populations or activity in the area, development will be prohibited or require mitigation and/or compensatory measures, as appropriate. The impact of lighting on bats and their roosts and the lighting up of objects of cultural heritage must be adequately assessed in relation to new developments and the upgrading of existing lighting system*

Chapter 12: Architectural, Archaeological and Cultural Heritage

Chapter 12 of the CDP sets out the policy framework for the protection, conservation, and management of the county's archaeological, architectural, and cultural heritage. The Plan recognises that archaeological heritage includes structures, groups of structures, sites, features, or portable objects and their context, located above and below ground, on land or underwater, and includes areas with potential for such remains. The Record of Monuments and Places (RMP), maintained under the National Monuments

Acts 1930-2014, identifies protected archaeological sites within the County. All planning applications in the vicinity of known or suspected archaeological sites are required to take account of these designations and the archaeological potential of the site. Development proposals within or near an RMP site or Zone of Archaeological Potential (ZAP) must be accompanied by an archaeological impact assessment.

The following policy objectives are of relevance:

> *ARC 1 Legislative Context: Support and promote the preservation, conservation and appropriate management and enhancement of the County's archaeological sites and monuments, together with the settings of these monuments, having regard to the legislative, statutory and policy provisions relevant to the conservation of the archaeological heritage.*
>
> *ARC 4 Protection of Archaeological Sites: Protect archaeological sites and monuments their settings and visual amenity and archaeological objects … that are listed in the Record of Monuments and Places, in the ownership/guardianship of the State, or that are subject of Preservation Orders or have been registered in the Register of Historic Monuments, or that are newly discovered and seek to protect important archaeological landscapes.*
>
> *ARC 5 Development Management: All planning applications for new development, redevelopment, any ground works, refurbishment, and restoration, etc. within areas of archaeological potential or within close proximity to Recorded Monuments or within the historic towns of County Galway will take account of the archaeological heritage of the area and the need for archaeological mitigation.*
>
> *ARC 9 Recorded Monuments: Ensure that any development in the immediate vicinity of a Recorded Monument is sensitively designed and sited and does not detract from the monument or its visual amenity.*

Chapter 14: Climate Change, Energy and Renewable Resource.

Chapter 14 of CDP outlines Galway County Council's commitment to addressing climate change through an integrated policy approach encompassing both mitigation and adaptation. Chapter 14 of the CDP has the overarching objective to:

> *Reduce the carbon footprint by integrating climate action into the planning system in support of national targets, support indigenous renewable sources in order to reduce dependence on fossil fuels and improve security of supply and the move to a competitive low carbon economy.*

The following policy objectives are relevant to the proposed development:

> *CC 1 Climate Change: Support and facilitate the implementation of European, National and Regional objectives for climate adaptation and mitigation taking into account other provisions of the Plan (including those relating to land use planning, energy, sustainable mobility, flood*

risk management and drainage) and having regard to the Climate mitigation and adaptation measures.

CC 2 Transition to a low carbon, climate-resilient society: It is a policy objective of the Planning Authority to support the transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050, by way of reducing greenhouse gases, increasing renewable energy, and improving energy efficiency.

CC 8 Climate Action and Development Location: To implement, through the plan and future local areas plans, policies that support and encourage sustainable compact growth and settlement patterns, integrate land use and transportation, and maximise opportunities through development location, form, layout and design to secure climate resilience and reduce carbon dioxide and greenhouse emissions.

CC 9 Mainstreaming Climate Change Adaptation: Galway County Council shall incorporate climate change adaptation into land use planning, building layouts, energy, transport, natural resource management, forestry, agriculture and marine waters.

Chapter 14 of the CDP sets out the strategic objectives for managing flood risk within the county, aligned with national and European legislative frameworks. The following policy objectives are relevant to the proposed development:

FL 8 Flood Risk Assessment for Planning Applications and CFRAMS: Protect Flood Zone A and Flood Zone B from inappropriate development and direct developments/land uses into the appropriate Flood Zone in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 (or any superseding document) and the guidance contained in Development Management Standard 68.

Site-specific Flood Risk Assessment (FRA) is required for all planning applications in areas at elevated risk of flooding, even for developments appropriate to the particular flood zone.

The detail of these site-specific FRAs will depend on the level of risk and scale of development. A detailed site-specific FRA should quantify the risks, the effects of selected mitigation and the management of any residual risks. The Planning Authority shall have regard to the results of any CFRAM Studies in the assessment of planning applications.

Development proposals will need to be accompanied by a Development Management Justification Test in addition to the site-specific Flood Risk Assessment. Where only a small proportion of a site is at risk of flooding, the sequential approach shall be applied in site planning, in order to seek to ensure that no encroachment onto or loss of the flood plain occurs and/or that only water compatible development such as Open Space would be permitted for the lands which are identified as being at risk of flooding within that site.

In Flood Zone C, where the probability of flooding is low (less than 0.1%, Flood Zone C), site-specific Flood Risk Assessment may be required and

the developer should satisfy themselves that the probability of flooding is appropriate to the development being proposed.

In addition to the County Plan SFRA datasets (including the Flood Zones, CFRAMS mapping, historical and predictive groundwater mapping, predictive pluvial mapping and historical flood risk indicator mapping, such as the Benefitting Lands mapping), new and emerging datasets (such as the OPW's National Fluvial Mapping that will supersede existing PFRA fluvial mapping for catchments greater than 5km2) must be consulted by prospective applicants for developments and will be made available to lower-tier Development Management processed in the Council. Applications for developments in coastal areas and associated assessments shall also consider wave overtopping and coastal erosion.

FL 11 FRA and Environmental Impact Assessment (EIA): Flood risk may constitute a significant environmental effect of a development proposal that in certain circumstances may trigger a sub-threshold EIA. FRA should therefore be an integral part of any EIA undertaken for projects within the County.

Section 14.7 sets out the policy objectives relating to Energy and Renewable Resource and recognises that

"An efficient and secure energy supply is essential to the future growth and sustainable development of County Galway."

In this regard, the Energy Expectation for Galway for the plan period identifies that there will be a reduction in demand for non-renewable energy sources, such as coal and oil, as well as an increased demand for electricity from all sectors, leading to more sustainable energy usage across the county and that natural gas will continue to have a role to play in the transition to a low carbon economy.

Section 14.7.3. further states that

"The de-carbonisation of the economy will require a significant increase in the provision of a secure and adequate electricity infrastructure to meet the growth in demand and to ensure that an efficient and reliable electricity supply is available to households, business and industry. A strong transmission grid is essential to attract and retain industrial investment, to ensure competitive energy supplies, to achieve balanced development, to reduce dependency on fossil fuels, and to achieve climate change targets."

The role of gas in the path to decarbonisation is recognised in the CDP where is states that:

"The Gas network plays a key role as part of the supporting infrastructure for renewable energy developments. Gas will play an important part of Ireland's energy economy for the foreseeable future. Even with a clear move towards renewable energy in the growing electricity sector, Ireland is likely to rely on natural gas for about one-third of electricity generation in 2030 to support the transition to a low carbon economy"

The following policy objectives are of relevance to the proposed development:

EG 1 Gas Network and Generating Capacity: To support the development of the gas network and associated generating capacity in order to sustainably support and augment renewable electrical energy generated in County Galway.

EG 2: Electricity Transmission Networks: To support the development of the transmission grid network in order to sustainably accommodate both consistent and variable flows of renewable energy generated in County Galway…

EG3 Natural Gas and Synthetic Networks: To facilitate the delivery and expansion of the Natural Gas and Synthetic Gas infrastructure for storage, transmission and energy generation throughout the County for both domestic and business/industry use and to have regard to the location of existing gas infrastructure pipeline in the assessment of planning applications

RE1 Renewable Energy Generation and ancillary facilities: To facilitate and support appropriate levels of renewable energy generation and ancillary facilities in the county to meet national, regional and county renewable energy targets, to facilitate a reduction in CO2 emissions and the promotion of a low carbon economy.

RE 2 Local Authority Renewable Energy Strategy: The policy objectives and Development Management Standards set out in the Local Authority Renewable Energy Strategy for County Galway shall be deemed the policy objectives and development management standards for the purpose of the Galway County Development Plan 2022-2028.

Taken together, the provisions of the Galway County Development Plan support the delivery of critical energy and infrastructure development at appropriate locations, subject to environmental protection, amenity considerations, and compliance with development management standards.

6.4.2 County Galway Local Authority Renewable Energy Strategy (LARES) 2022

The County Galway Local Authority Renewable Energy Strategy (LARES), as outlined in Appendix 1 of the Galway County Development Plan 2022–2028 (GCDP), is a strategic framework developed to guide the county's transition towards sustainable energy sources.

The LARES was prepared to replace the previous Wind Energy Strategy from the GCDP 2015-2021, ensuring alignment with updated national and regional policies. The document provides specific policy objectives and development management standards related to renewable energy.

While the key focus of the strategy is renewable energy, it recognises that the development of a proper functioning renewable energy system requires good quality supporting infrastructure. The strategy states that:

> *"It must also be recognised that natural gas, particularly renewable and Indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand. Indeed, there are aspects of bioenergy developments that generate renewable gas such as biogas which needs to be appropriately dispersed in the transmission network. Therefore, the gas network plays a key role as part of the supporting infrastructure for renewable energy developments"*

In this context, the Local Authority Renewable Energy Strategy recognises that supporting infrastructure, including the gas network, continues to play a role in enabling the effective integration and operation of renewable energy systems during the transition to a low-carbon energy framework.

6.4.3 Athenry Local Area Plan 2024 – 2030

The proposed development is located outside the settlement boundary for Athenry and is therefore outside the boundary of the Athenry Local Area Plan (LAP) however the due to the scale of the project and its proximity to Athenry, relevant policy objectives of the LAP have been considered as part of this planning application. The LAP sets out the overall Development Strategy and Planning Policy Objectives for the town and seeks to provide medium-term planning and development benefits for Athenry.

As defined in the RSES and the GCDP 2022-2028, Athenry now forms the eastern focus point of the Strategic Economic Corridor. The LAP recognises the importance of the Economic Corridor from Oranmore to Athenry to attract further investment building on the existing strategic location and infrastructure. Paragraph 2.4 of the LAP states that it is a key objective to promote Athenry as a designation for business, growing the economy to a scale appropriate to its strategic location.

Within the Athenry Plan Area there is a designated Architectural Conservation Area (ACA). An ACA is a place, area, group of structures or townscape, which is of special architectural, historical, archaeological, artistic, cultural, scientific, social, or technical interest. The LAP sets out that:

> *"the fundamental significance of Athenry ACA is its degree of survival as a medieval fortified town, which includes a number of fine monuments and Archaeological Heritage and/or Archaeological Objects. This historic function is visible in the street plan, land sizes, buildings,and architectural coherence. The majority of structures date from the late 19th Century and share many characteristics. Traditional shop fronts that have been retained are key features. The open fields and pastures within the walls are of the utmost significance. The form, attractiveness, and originality of the town as a whole are of international significance and have the potential to attract a larger cultural audience."*

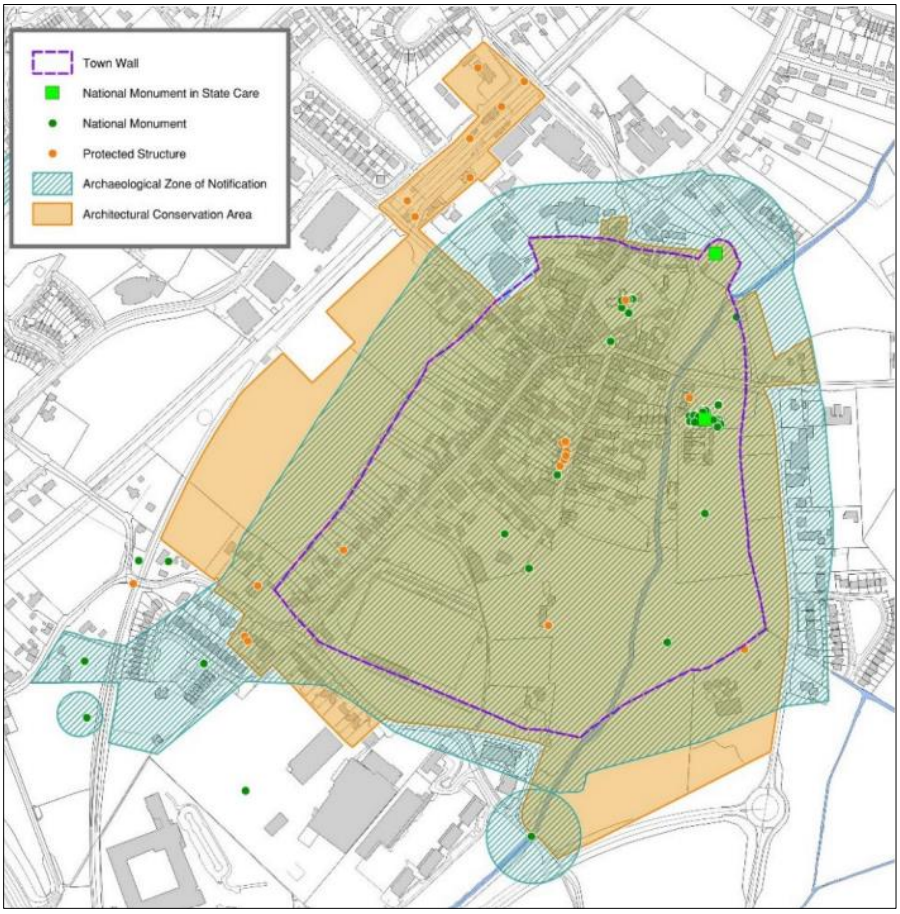


Figure 6.2: Athenry Architectural Conservation Area shown in orange. Map Source: Athenry Local Area Plan 2024 - 2030.

Although the proposed development is located outside the LAP boundary, the presence and proximity of the ACA and the scale of the proposed development were considered to inform this planning statement. The following policy objective is relevant to the proposed development:

> *ASP 40 – Architectural Conservation Areas: Protect, conserve and enhance the essential character of the Athenry Architectural Conservation Areas (ACAs) through the appropriate management and control of the design, location and layout of new development, respecting surviving historic plots and street patterns, alterations or extensions to existing structures, and/or modifications to the character or setting of the Architectural Conservation Areas. The identification of areas of special interest within the plan boundary may be considered during the lifetime of the plan.*

The proposed development site is not located within the Architectural Conservation Area and does not form part of the LAP plan area.

However, while the proposed development is located outside the Athenry LAP boundary, consideration of the relevant objectives demonstrates appropriate regard for the setting of the town and the protection of the Architectural Conservation Area in accordance with local planning policy.

7. Planning Assessment

This section of the Planning Statement sets out the key planning considerations relevant to the Proposed Development having regard to applicable local, regional and national planning policy.

An EIAR has been prepared and accompanies this application to inform the competent authority's Environmental Impact Assessment (EIA) of the Proposed Development. In addition, Appropriate Assessment Screening was undertaken, which concluded that the preparation of a NIS was required. A NIS has therefore been prepared and submitted with the application to inform the competent authority's Appropriate Assessment.

It is not the purpose of this Planning Statement to duplicate the detailed environmental assessments contained within the EIAR and NIS. This section should therefore be read in conjunction with those documents.

All emissions to the environment arising from the operation of the Cashla Peaker Plant open-cycle gas turbine will be subject to regulation by the Environmental Protection Agency (EPA) under the Industrial Emissions licensing regime.

The EPA is the statutory body responsible for assessing, issuing and enforcing Industrial Emissions Licences (IELs). The operator will be required to obtain an IEL prior to operation of the Cashla Peaker Plant OCGT. The licence will prescribe binding emission limit values, monitoring requirements, reporting obligations, accident prevention measures and site closure requirements, including decommissioning obligations.

Operational environmental controls, including emissions to air, water and land, the prevention of soil and groundwater contamination, and the management of accidental spill risks, fall within the regulatory remit of the EPA. Any potential risks associated with fuel storage or operational activities will be subject to control through the IEL process, including requirements for containment, monitoring and environmental management systems.

At decommissioning stage, the facility will be required to comply with a site closure and restoration framework approved by the EPA under the Industrial Emissions licensing regime. This ensures that soil and groundwater are protected and that any residual environmental risks are appropriately managed.

Accordingly, matters relating to emissions control, environmental monitoring and compliance with Industrial Emissions licence requirements fall within the statutory remit of the Environmental Protection Agency.

7.1 Principle of Proposed Development

The site of the Proposed Development is located within the administrative boundary of Galway County Council and is governed by the provisions of the Galway County Development Plan 2022-2028 (CDP).

The lands are unzoned and situated outside any defined settlement boundary, within the townlands of Pollnagroagh and Rathmorrissy, Athenry, Co. Galway. In this context, the assessment of the Proposed Development is not governed by land-use zoning designations applicable within towns or villages, but rather by the overarching policies and objectives of the County Development Plan. The absence of zoning does not preclude development; rather, the acceptability of development is determined having regard to the proper planning and sustainable development of the area and the specific policy provisions applicable to the location and development proposed.

The site forms part of the Oranmore-Athenry Strategic Economic Corridor (refer to Figure 3.2 of this planning statement). Policy Objective EL 2 of the CDP seeks to reserve lands within the SEC to support nationally and regionally significant activities and to identify sites of appropriate size and location to accommodate necessary infrastructure or support activities which would not be appropriate in proximity to centres of population or sensitive environments. The Proposed Development, comprising strategic electricity generation infrastructure, is consistent with this objective.

> *"..Identify sites of appropriate size and location to accommodate necessary infrastructure or support activities which would not be appropriate in proximity to centre of populations or sensitive environments or economically sensitive activities.."* ***(Policy Objective EL 2)***

The CDP further recognises the importance of upgrading, improving and maximising infrastructural facilities within the SEC (Policy Objective EL 1) in order to attract investment and support economic growth. The Proposed Development will contribute to this objective by providing strategic energy infrastructure that supports security of electricity supply and underpins the continued functioning of the SEC as a location for enterprise and employment.

The suitability of the site is further reinforced by its proximity to established energy infrastructure. The existing 220kV Cashla Substation is located nearby, and the Galway–Mayo Gas Transmission Pipeline (BGE/85) traverses the southern portion of the site. Natural gas will be supplied via Gas Networks Ireland's national transmission network, facilitating efficient connection without the need for extensive new off-site infrastructure. Electricity generated by the plant will be exported via a proposed 220kV substation and underground grid connection to the existing Cashla Substation (the subject of a separate planning application).

The proposed development constitutes a lower-tier SEVESO site, and is therefore appropriately located outside centres of populations.

The development will be the subject of an Industrial Emissions Licence, as required under Section 82(1) of the Environmental Protection Agency Act 1992, in compliance with the EU Industrial Emissions Directive (IED). This will ensure that the proposed power plant will meet environmental standards, including air quality, noise, and emissions limits, as required by the Environmental Protection Agency (EPA).

As noted in section 6 of this report, Chapter 7 of the CDP outlines the county's objectives for infrastructure, utilities and environmental protection, and sets out the county's aim to:

> *"support and encourage investment and improvement in utilities, water, wastewater, electricity and gas infrastructure and support the development and enhancement of digital infrastructure".*

Furthermore, Policy Objective EG 2 Delivery of Electricity and Gas Infrastructure aims to:

> *"Support the provision and extension of electricity and gas transmission networks within the county which are critical to the economic development of the county subject to environmental quality, landscape, wildlife, habitats or residential amenity."*

The proposed development is consistent with the economic development strategy outlined in Chapter 5 of the CDP, as outlined in section 6 of this report, which supports the delivery of infrastructure-led economic growth, enterprise diversification, and job creation across the county. The proposed development aligns with the function of the SEC corridor by facilitating energy infrastructure of strategic scale, which supports economic activity while being appropriately located away from sensitive environments and residential centres. This designation, as outlined in the CDP, aims to attract national and international investment and promote the area as a centre for major national and international enterprise. In this regard, the proposal is considered to be in accordance with the economic development objectives of the Oranmore – Athenry SEC and **Policy Objective EL 2**.

In view of the foregoing, and having regard to the site's location within the Strategic Economic Corridor its proximity to existing gas and electricity transmission infrastructure, and alignment with the objectives of the CDP, particularly those related to infrastructure development, electricity transmission and economic growth, it is considered that the principle of the proposed development is acceptable and appropriate at this location.

7.2 Compliance with European Legislation and Policy

A detailed overview of the European Legal and Policy Context is provided in Section 6.1 of this planning statement. It highlights the progressive strengthening of policy measures and legal frameworks designed to meet a legally binding EU-wide target of at least 42.5% renewable energy consumption by 2030 under RED III, achieving the objective of climate neutrality in the Union by 2050 under the European Green Deal and the legal commitment of at least a 55% net reduction in greenhouse gas emissions by 2030 relative to 1990 levels as mandated by the European Climate Law (Regulation (EU) 2021/1119. The Fit for 55 legislative and policy framework is a central part of the EU's broader European Green Deal aiming to meet the 55% emissions reduction goal in a fair, cost-effective and competitive way.

Within this Legal and Policy context framework, the challenge of phasing out Europe's reliance on Russian fossil fuels by 2030 while improving the resilience and security of Europe's energy system is recognised. REPower EU

proposes to achieve an acceleration in the green energy transition by supporting the diversification of supply, and the maintenance of reliable electricity infrastructure. This was further supported by EU Electricity Market Design Reform (2024-2026) which updated the regulatory framework governing electricity markets to reflect higher penetrations of variable renewable energy. The reformed framework acknowledges that accelerated deployment of renewable energy sources necessitates a growing availability of flexibility solutions as part of a resilient energy system.

The proposed development consists of a flexible market solution designed to support the integration of renewable energy sources into the electricity system. It will provide backup or 'flexible' generation during critical periods as determined by system requirements when renewable energy sources is reduced and demand is high.

Having regard to the European Policy and Legal Framework set out above and in section 6.1 of this planning statement, the provision of flexible and dispatchable capacity forms part of the broader system architecture required to facilitate increased renewable energy penetration while maintaining security of electricity supply. In this context, the Proposed Development is considered to be consistent with EU policy objectives supporting decarbonisation, renewable integration and energy system resilience.

7.3 Compliance with National Policy and Legislation

A detailed overview of the National legal and policy context is provided in Section 6.2 of this planning statement. It sets out Ireland's legal commitment under the Climate Action and Low Carbon Development (Amendment) Act 2021 to achieve a 51% reduction in greenhouse gas emissions by 2030 (relative to 2018 levels) and to reach net-zero emissions no later than 2050. Within this overarching legal framework several key policy documents and plans have been prepared by the Government including the Policy Statement on Security of Electricity Supply 2021, the National Energy and Climate Plan 2021-2030, the National Energy Security Framework 2022, Energy Security in Ireland to 2030, Ireland's Long-term Strategy on Greenhouse Gas Emissions Reduction 2024 and the Climate Action Plan (CAP) 2025.

A key message within these plans and policy frameworks is the importance of ensuring the continuation of a secure supply of gas as a critical component of an increasingly renewable energy-based electricity system. The development of new conventional generation (including gas-fired and gasoil/distillate-fired generation) is outlined as a national priority (*Policy Statement on Security of Electricity Supply 2021*) and the procurement of at least 2GW of new flexible, enduring, capacity through market mechanisms by 2030 is recognised as a key policy enabler to support a secure transition to a renewables-led electricity sector (*Energy Security in Ireland to 2030*). The delivery of at least 2GW of New Flexible Gas Plant by 2030 is included as a national target within the CAP 25. Similarly, the National Development Plan 2021-2030 includes the following as a Strategic Investment Priority:

> *Delivery of circa 2 GW of new conventional (mainly gas-fired) electricity generation capacity to support the operation of a predominantly*

wind/solar electricity system and provide security of supply for when variable electricity generation (wind/solar) is not sufficient to meet demand

The NDP review undertaken in 2025 confirmed that the strategic investment priorities set out in the National Development Plan 2021-2030 will continue to be implemented.

It is intended that the Proposed Development will be operational in 2029 and, once constructed, will provide flexible generation capacity of either 325 MW or 334 MW, depending on the final turbine technology selected during procurement. The maximum output capacity will not exceed 334 MW (0.334 GW). Refer to Chapter 8, Climate, in the EIAR. The variation in output reflects only differences in turbine model efficiency. There is no change to the physical parameters of the development, including footprint, building dimensions, stack height, layout or associated infrastructure.

Taking into account the evolving national policy context, the Revised National Planning Framework (NPF) 2025 places stronger emphasis on ensuring the resilience and security of Ireland's energy systems, recognising the need for fuel diversification, enhanced system flexibility, and investment in critical infrastructure. The proposed development forms part of a wider project that, once connected to the National grid, will serve to reinforce the transmission network and facilitate the distribution of a more renewables focused source of energy across the major demand centres in line with **National Strategic Outcome 8**.

It is therefore considered that the Proposed Development's flexible and dispatchable operational profile aligns clearly with Ireland's national climate and energy policy framework. The project will contribute to the delivery of nationally identified flexible generation capacity required to support renewable energy integration, safeguard security of electricity supply and facilitate the transition to a low-carbon and climate-neutral energy system. In this regard, the Proposed Development accords with the strategic direction set out in national legislation, energy security policy and capital investment priorities.

In respect of NSO 9, Sustainable Management of Environmental Resources and relevant NPOs concerning environmental protection, climate integration and river basin management, the environmental parameters of the development have been comprehensively assessed in the accompanying Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS).

The EIAR evaluates potential impacts across all relevant environmental factors, including climate, air quality, water, land and soils, noise, biodiversity and landscape. The NIS assesses potential effects on European Sites in accordance with the Habitats Directive. These assessments demonstrate that, subject to the mitigation measures proposed and regulatory controls including Industrial Emissions licensing, the development is consistent with the environmental safeguards and climate objectives embedded within the NPF.

7.4 Compliance with Regional Planning Policy

The Proposed Development comprises a flexible and dispatchable generation asset designed to support the secure integration of renewable energy into the electricity transmission network. Once connected to the existing Cashla 220kV Substation, the development will provide either 325MW or 334MW of generation capacity, reinforcing the regional and national transmission system and contributing to system resilience during periods of peak demand or reduced renewable output.

The Regional Spatial and Economic Strategy (RSES) for the Northern and Western Region 2020–2032 includes specific Regional Policy Objectives (RPOs) supporting the development and reinforcement of electricity and gas infrastructure as set out in Section 6.3.1.

The Proposed Development directly aligns with these objectives. It supports a secure and reliable electricity network (RPO 8.1), facilitates renewable integration through flexible dispatchable capacity (RPO 8.3), and is strategically located in proximity to existing high-capacity gas transmission infrastructure (RPO 8.6), thereby optimising established energy assets within the region.

Accordingly, the Proposed Development is consistent with, and supports the implementation of, the Regional Spatial and Economic Strategy for the Northern and Western Region 2020–2032.

7.5 Compliance with Local Planning Policy: Galway County Development Plan 2022-2028

7.5.1 Climate Change, Energy & Renewable Resources

Chapter 14 of the CDP acknowledges the fundamental role of secure, resilient, and decarbonised energy infrastructure in facilitating economic development, maintaining regional competitiveness, and delivering Ireland's legally binding climate and energy targets. The Plan recognises that while the expansion of renewable energy is critical to the national transition towards a low-carbon economy, there remains a continued need for flexible, dispatchable generation capacity to support grid stability during periods of variable renewable output.

The proposed development, comprising a gas-fired open cycle gas turbine (OCGT) power plant, represents a strategic form of dispatchable energy infrastructure. It will operate in a flexible manner to provide fast-response electricity generation during times of peak demand or grid constraint, thereby complementing intermittent renewable sources such as wind and solar. This supporting role is consistent with the Plan's recognition of the need for secure and reliable electricity infrastructure to underpin renewable deployment and economic development. .

In alignment with **Policy Objective RE 1**, the proposal supports the delivery of energy infrastructure that will enable greater integration of renewable

energy into the national grid by mitigating risks associated with supply intermittency. Although the development does not itself constitute renewable generation, it is functionally interdependent with renewable deployment by ensuring overall system resilience and continuity of supply.

In addition, the Proposed Development is consistent with **Policy Objectives EG 1 and EG 2**, which support the sustainable improvement and expansion of electricity transmission and distribution infrastructure to accommodate both consistent and variable renewable energy flows. The development will reinforce existing grid infrastructure in proximity to the Cashla 220kV Substation and support the stable operation of the wider transmission network.

Furthermore, the proposal aligns with **Policy Objective CC 2**, which supports the transition to a competitive, low-carbon and climate-resilient economy, by facilitating renewable integration while maintaining security of supply.

To conclude, the Proposed Development is consistent with the objectives of the Galway County Development Plan 2022–2028, particularly those set out in Chapter 14 relating to climate action, energy infrastructure and the transition to a low-carbon economy. The siting of the development within the Oranmore–Athenry Strategic Economic Corridor reflects the Plan's spatial strategy of directing nationally and regionally significant infrastructure to locations capable of accommodating such development, including areas proximate to existing high-voltage electricity and gas transmission infrastructure. The facility will operate within a robust regulatory framework, including the requirement for an Industrial Emissions Licence, ensuring that operational emissions and environmental performance are independently regulated. Furthermore, as a lower-tier Seveso site, the development is appropriately located outside centres of population in accordance with the Plan's objectives relating to the management of hazardous substances. Having regard to the foregoing, the principle of the Proposed Development is considered to be consistent with the local planning policy framework and appropriate at this location.

7.5.2 Biodiversity

The proposed development has regard to the policy framework set out in Chapter 10 of the CDP, which aims to protect and enhance biodiversity, including both designated ecological sites and non-designated habitats of value. Chapter 5: Biodiversity of the EIAR outlines the baseline ecological conditions of the study area, informed by desk-based and ecological field surveys, and provides an assessment of potential effects. Mitigation measures and biodiversity enhancements including pre-construction ecological surveys, additional planting, bunding, containment and groundwater monitoring, monitoring of landscape implementation during the operational phase, bat sensitive lighting, limits on construction hours and limitations on vegetation clearance during the bird breeding season are proposed (refer to Chapter 5 for further detail). The assessment and mitigation measures proposed are consistent with Chapter 10 policy aims **(NHB 4 and NHB 9)**.

This Habitats Directive (Council Directive 92/43/EEC) requires that all plans and projects must be screened for potential impact on Special Areas of conservation (SACs) or Special Protection Areas (SPAs). SACs and SPAs form a pan-European network of protected sites known as Natura 2000 sites. In accordance with **Policy Objective NHB 2**, an Appropriate Assessment (AA) screening has been undertaken to assess whether the project would result in likely significant effects on any European site, either alone or in combination with other pans or projects.

The AA screening identified that during the construction phase, works may involve the exposure of highly sensitive groundwater to potential contamination, and therefore, there is the possibility for contaminated groundwater to flow and ultimately discharge into Oranmore Bay and/or Dunbulcaun Bay. Although the distance via groundwater to the nearest relevant surface waterbody is significant (>6km), the precautionary principle was applied and potential effects on the qualifying interests/special conservation interest species and habitats present in Galway Bay Complex SAC, Cregganna Marsh SPA and Inner Galway Bay SPA were screened in for Stage 2 AA.

A Stage 2 Appropriate Assessment was therefore undertaken, and a Natura Impact Statement (NIS) accompanies this planning application. The NIS concludes that following a comprehensive evaluation of the potential direct, indirect and in-combination impacts on the qualifying interests of Galway Bay Complex SAC, Cregganna Marsh SPA and Inner Galway Bay SPA and taking account of the proposed mitigation measures, the Proposed Development will not adversely affect the integrity of any European site, either alone or in combination with other plans or projects.

The findings of the EIAR and the conclusions of the Stage 2 Appropriate Assessment demonstrate compliance with Policy Objective NHB 2 of the CDP and the requirements of Article 6(3) of the Habitats Directive. The Proposed Development, subject to the mitigation measures identified in the EIAR and NIS, will not result in adverse effects on European sites or on biodiversity within the receiving environment.

7.5.3 Flood Risk

In accordance with Chapter 14 of the CDP, which sets out the strategic approach to flood risk management in line with the Flood Risk Management Guidelines (2009), the proposed development has been assessed for flood risk. A Stage 1 Flood Risk Assessment, prepared by AtkinsRéalis, has been undertaken and can be found enclosed in Appendix 2 of the EIAR. The Stage 1 Flood Risk Assessment (Flood Risk Identification) concluded as follows::

- Historic risk of flooding is not identified at the proposed development site;
- Alluvium deposits were not identified on the site;
- The OPW Floodmaps and the general viewer indicate that the proposed site is in Flood Zone C; AND,
- Karst formations have been identified in the vicinity of the project but no groundwater flooding is recorded.

The Proposed Development constitutes "Highly Vulnerable Development" within the meaning of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009), as it comprises electricity generating infrastructure and a lower-tier Seveso site. A Stage 1 Flood Risk Assessment confirms that the site is located within Flood Zone C i.e. it has a low probability of flooding.

In accordance with the Flood Risk Matrix set out in the Guidelines, Highly Vulnerable Development is considered appropriate in Flood Zone C. As such, the Proposed Development is appropriate at this location from a flood risk perspective and neither a Justification Test nor a Stage 2 Flood Risk Assessment is required.

The proposal therefore complies fully with the relevant national guidance and the requirements of the CDP **Policy Objectives FR8 and FR11.**

7.5.4 Karst

During the pre-application consultation meetings both the Commission and Galway County Council identified the Karst Landscape in the area as a key consideration. A detailed assessment of the potential effects of the project on Lands, Soils and Geology, including Karst, is set out in Chapter 11 of the EIAR and the potential effects on hydrogeology is dealt with in Chapter 12 Water. Both chapters conclude that no significant effects are predicted and should be referred to in conjunction with this section.

In summary, comprehensive geophysical and geotechnical surveys were undertaken to inform Chapters 11 and 12. The scope of the ground investigation was carefully developed by the AtkinsRéalis geotechnical and environmental teams to ensure that sufficient, project-specific geo-environmental and engineering data was obtained for the Proposed Project at the preliminary design stage. The investigation strategy was tailored to the receiving environment and aligned with the evolving engineering design, baseline monitoring data, and environmental assessment requirements.

The results of these surveys confirmed there is potential for subsurface karst features beneath the Proposed Development site. This has been fully characterised within the EIAR on a precautionary basis and has informed both the impact assessment and preliminary foundation design. Given the inherent heterogenous nature of karst geology, supplementary ground investigations will be undertaken at detailed design and pre-commencement stages to further refine and validate the established ground model. These investigations represent refinement of an already robust understanding of site conditions. Foundation solutions have been specifically developed to accommodate karst geology as set out in the Ground Conditions and Preliminary Foundation Design Commentary: Technical Note prepared by AtkinsRéalis and enclosed in Appendix 11 of the EIAR. Robust karst management protocols set out in the CEMP (enclosed in Appendix 2 of the EIAR) will be implemented during construction to identify and appropriately address any features encountered. These measures will effectively manage risks relating to foundation performance, ground stability, and structural

integrity, including protection of groundwater pathways ensuring no significant impact on the receiving land, soils, or geological environment.

During operation, no significant environmental impacts are anticipated in relation to underlying karst conditions.

The design incorporates fully sealed secure onsite containment systems for fuel, wastewater, and contaminated stormwater/firewater runoff, together with the offsite management of associated waste streams. As such, Chapters 11 and 12 conclude that no significant effects are expected at the construction, operational or decommissioning stage having regard to the precautionary assessment undertaken and the embedded mitigation measures described above.

7.5.5 Landscape & Visual Impact

The CDP recognises the significance of the county's landscapes and seeks to balance sustainable development with landscape protection. A comprehensive landscape and visual impact assessment is set out in Chapter 6 Landscape and Visual of the EIAR in accordance with policy objective LCM 2. The subject site is located within the Central Galway Complex Landscape designation, specifically the Southern River Clare Basin Unit, which is classified as having low landscape sensitivity and value. This designation reflects a landscape unlikely to be adversely affected by change. Furthermore, there are no recorded protected views, prospects, or scenic routes in the vicinity of the site.

A Zone of Theoretical Visibility (ZTV) was prepared to determine likely visual impacts and inform Chapter 6 of the EIAR. The ZTV demonstrated that visual impacts will be primarily experienced from the motorway corridor to the west and south of the subject site. There may also be distant views from the surrounding regional road networks (R339, R347 and R348), sections of the surrounding local road networks (L3103, L7109, L3105 and L3125) and some dwellings located along these routes.

Figure 7.1 Photomontage Viewpoint Locations. Source: EIAR Volume 3 Appendix 6.1.

Sixteen representative viewpoints were selected for the purpose of preparing verified photomontages which show the existing view, Year 1 view, and Year 15 view (where relevant, when screen planting would be approximately 9 m in height)(refer to Figure 7.1). The photomontage booklet can be found in Appendix 6 of the EIAR. Overall, Chapter 6 of the EIAR concluded that during the construction, operation and decommissioning phases, the Proposed Project will result in a limited number of significant residual visual effects, principally within the immediate context of the main site. Significant adverse effects would be experienced by a small number of nearby receptors where the project would introduce new elements into the landscape and partially alter some existing views. Beyond these areas, residual effects would be slight or neutral and not significant in EIAR terms.

During the post decommissioning phase, any adverse effects would become beneficial as all site structures are removed and mitigation screen planting is retained and has matured contributing to an improvement in views.

While the proposed development will introduce a new built element within an open landscape, the site is located within a landscape of low sensitivity and in proximity to existing infrastructure, including the M17/M18 Motorway and other infrastructural features (such as electricity pylons). In this context the development will not appear incongruous within the receiving environment. The proposed landscaping and boundary treatments (as demonstrated in Landscape Drawing Refs: 24032-CO-LP-1-01-REV-10, 24032-CO-LP-1-02-REV-10 and 24032-CO-LP-1-03-REV-10) will be implemented to mitigate effects.

While the development will introduce built form and boundary treatments within a traditionally open landscape, the site is located within a low sensitivity landscape that is already influenced by significant infrastructural elements, including the M17/M18 Motorway and existing electricity transmission infrastructure.

The LVIA demonstrates that significant effects are limited, localised and experienced by a small number of receptors, with effects reducing over time as mitigation planting establishes. Post-decommissioning, residual effects will become beneficial.

In this context and having regard to the strategic infrastructure nature of the proposal, the development does not materially undermine the objective of preserving the character of open landscape areas. Rather, it represents a proportionate and appropriately mitigated intervention, consistent with Policy Objectives LCM 2 and LCM 4 of the County Development Plan.

7.5.6 Lighting

Chapter 7 of the CDP acknowledges the need to control artificial lighting in order to safeguard residential amenity, protect biodiversity, maintain visual and landscape quality, promote road safety, and support energy efficiency objectives. While recognising the operational need for lighting in certain developments, the Plan places strong emphasis on minimising unnecessary light spillage and maintaining dark skies, particularly in rural settings. The

relevant policy framework includes Policy Objectives LP 1 Lighting Schemes, LP 2 Lighting and Climate Action and LP 3 Dark Skies.

A lighting report has been prepared by Lighting Reality and can be found enclosed in Appendix 2 of the EIAR. Lighting drawings have also been prepared by Lighting Reality and can be found as part of the planning application drawing pack. The lighting design has been prepared in accordance with EN-13201 and relevant national guidance, and demonstrates compliance with the performance standards set out in the County Development Plan.

The operational lighting for the proposed project has been designed in line with Bat Conservation Trust guidance (GN 08/23) insofar as practicable having regard to safety and operational requirements, and has been informed by site-specific bat survey data.

With the exception of the AGI, boundary lighting will utilise warm-colour luminaires (2700K), while lighting along the AGI boundary will be 3000K. The lighting has been designed so that levels reduce to less than 1 lux before reaching the site boundary. This ensures that light spill into adjoining lands and habitats is effectively controlled and that excessive light pollution is avoided. In the majority of cases this has been achieved by careful placement, orientation and mounting height of the luminaries.

Importantly the current design achieves less than 1 lux before reaching the northern boundary which recorded the most bat activity during the bat surveys and contains trees which have bat roost potential (although no bats were recorded using the trees to roost during the surveys). This demonstrates that the lighting design responds directly to identified ecological sensitivities.

In addition, as part of the proposed landscaping, extensive tree planting has been included along the western and northern boundaries to provide screening. This will further reduce light spill from the proposed development.

The combined effect of directional lighting, reduced colour temperature, shielding measures and landscape screening will maintain the rural character of the receiving environment and protect local biodiversity.

Accordingly, the lighting strategy demonstrably complies with Policy Objectives LP 1, LP 2 and LP 3 of the County Development Plan. The scheme minimises light spillage, utilises energy-efficient LED fittings, limits colour temperature, avoids upward light distribution, and protects identified ecological receptors. The proposed development therefore does not give rise to any material contravention of the lighting or dark skies policies of the County Development Plan.

7.5.7 Traffic & Access

This section should be read in conjunction with Chapter 10 Traffic and Transportation of the EIAR which includes details of the traffic and transport assessment carried out. The assessment methodology is consistent with Transport Infrastructure Ireland's (TII) Traffic and Transport Assessment Guidelines in accordance with **Policy Objective NR3.**

Access to the Proposed Development will be facilitated by way of a newly proposed 1.15km long access road connecting from the main development site to a proposed new vehicular entrance off the L3103 road, approximately 1km east of the M17 motorway. This access will facilitate both construction and operational traffic to and from the site in a safe and efficient manner.

The proposed development site is expected to receive both standard and abnormal load deliveries. Standard deliveries will be facilitated via the immediate regional road system which include the following roads (in order of proximity to the site): L3103, R339, R347, M6 and the M17. The extraordinary abnormal loads are anticipated to utilise the route illustrated in figure 7.1 below and will be managed in accordance with the statutory abnormal load permitting process and the approved Construction Traffic Management Plan (CTMP).

The development is not anticipated to generate significant volumes of traffic during its operational phase due to the minimal staff presence on-site and its peaking operational profile. The majority of traffic movements will occur during the construction phase, which will be temporary in nature and managed via an approved CTMP to ensure no significant adverse impact on the capacity, safety or operational efficiency of the surrounding road network. Chapter 10 of the EIAR concludes that the construction phase of the project will result in short-term significant impacts however significant mitigation measures will be implemented to reduce the overall impact. No other significant impacts are anticipated during any other phase.

Abnormal Loads and Construction Traffic Management

It is anticipated that abnormal load movements will be required during the construction phase of the Proposed Development, particularly for the delivery of oversized plant equipment and specialist components which fall under the definition of Exceptional Abnormal Loads. These movements will be planned in close coordination with Transport Infrastructure Ireland (TII), Galway County Council, and An Garda Síochána, in accordance with relevant TII guidance and abnormal load permitting requirements.

The exceptional abnormal load deliveries are anticipated to utilise the haul route illustrated in figure 7.2. below. The final haul route will be agreed prior to the delivery of extraordinary or abnormal loads, which may occur several months after the commencement of on-site construction activity for the Proposed Development.

As part of the abnormal load delivery process pre-construction and post-construction surveys of the public road network proposed for use as haul routes, including inspections of bridges, culverts, and other relevant structures, shall be carried out by the applicant in advance of the first abnormal load delivery. These requirements shall not apply to earlier phases of development that do not involve such movements.

The locations and scope of the surveys and inspections shall be agreed in advance with Galway County Councils Roads Authority and shall include structural capacity assessments, where required, to confirm the network's suitability to accommodate the proposed load types and volumes.

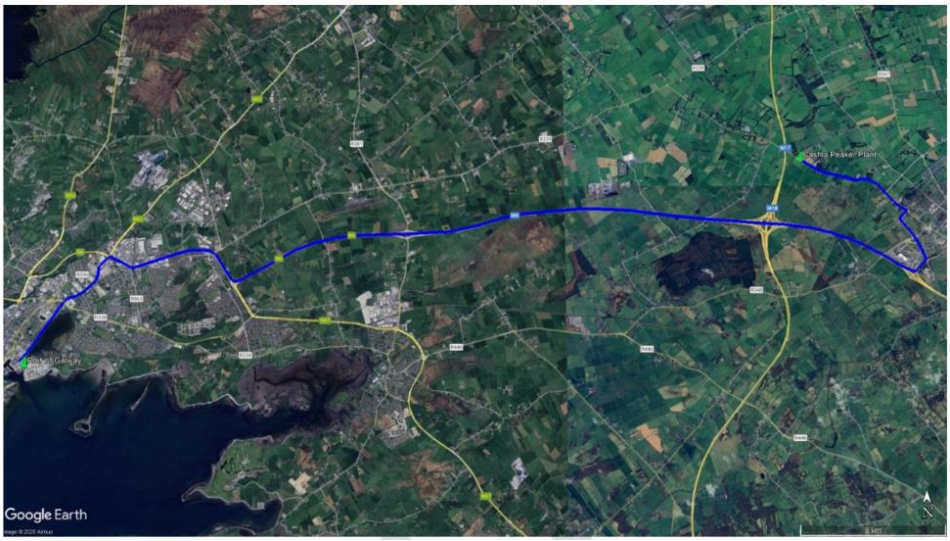


Figure 7.2 Proposed Abnormal Load Haul Route. Source: Chapter 10 Traffic and Transportation EIAR (AtkinsRéalis, 2026)

As set out in Section 2.3.7 of this Planning Statement, it is respectfully submitted that any Grant of Permission include a condition requiring the submission and agreement of an Abnormal Load Management Plan prior to the first delivery of any abnormal or Exceptional Abnormal Load (and not prior to commencement of development generally).

Having regard to the findings of the Traffic and Transport Assessment, the limited operational traffic generation associated with the peaking plant, and the management measures proposed for the construction phase (including abnormal load coordination as set out in Section 2.3.7), it is concluded that the Proposed Development will not give rise to any significant adverse impact on the capacity, safety or operational efficiency of the surrounding road network. Accordingly, the proposal is consistent with Policy Objectives NR1 Protection of Strategic Roads, NR3 Traffic and Transport Assessment and NNR2 Safeguard Regional and Local Roads of the County Development Plan.

Parking

DM Standard 31 of the CDP sets out the parking standards for the County and the car parking standards for both 'Industry, Manufacturing and Light Industry' as set out in Table 7.1 below:

Table 7.1 Maximum Car Parking Standards

Development	Car Parking Standard
Industry/Manufacturing/Light Industry	1 car space per 33m2 of gross floorspace
Data Centre 1 per 100m2 gross floor area	1 space per 100m2 gross floor area

DM Standard 31 sets out that a flexible approach to these standards may be applied where such a case is substantiated, there is no traffic safety issue, and it is clearly demonstrated to the Planning Authority.

The proposed development comprises an industrial development. However, the facility is designed to operate with a minimal on-site staffing requirement, with only a minimal on-site presence (approx. 3 people) consisting primarily of security and routine maintenance personnel. Although the exact number of vehicles associated with these functions cannot be precisely determined, the site is expected to accommodate up to 2 security vehicles and 10 maintenance vehicles during peak activity.

Given the low level of staffing, it is considered that the parking standards for a Data Centre are an appropriate comparison in this instance. If the development were to be classified similarly to a data centre based on its low occupancy the maximum parking requirement would be approximately 17 spaces (based on an overall floor area for the Proposed Development of 1664.4sqm).

The current proposal includes provision for 15 parking bays in total broken down between the Peaker Plant Parking Area, which comprises 1 accessible bay, 4 EV charging bays, and 7 standard bays and the AGI compound which comprises 3 standards bays.

This level of provision is considered proportionate to the operational characteristics of the development and reflects the flexible approach permitted under DM Standard 31.

The CDP does not specify bicycle parking standards for 'Industry/Manufacturing/Light Industry' or 'Data Centre' developments. However, it does state that for 'Other Developments' 1 bike storage space for every car space should be allocated. The Proposed Development has provided 20 bicycle spaces.

Accordingly, the proposed parking and bicycle provision is considered consistent with DM Standard 31 and will not give rise to any traffic safety or capacity concerns.

7.5.8 Archaeology & Cultural Heritage

The CDP establishes the policy framework for the protection, conservation, and management of archaeological, architectural, and cultural heritage within the county. Archaeological heritage encompasses both known and potential sites, structures, features, and objects above and below ground, as identified in the Record of Monuments and Places (RMP) and Zones of Archaeological Potential (ZAP). The CDP states that Council requires that a proposed development (due to location, size or nature) which may have archaeological implications for archaeological heritage be subject to an archaeology assessment. As set out in the CDP

"This includes areas close to archaeological monuments, extensive in area (half hectare or more) or length (1km or more) and development that require an Environmental Impact Statement[4]."

The proposed development is 11.54ha in area and is also accompanied by an EIAR therefore an archaeological assessment was carried out in accordance with the requirements of the CDP. Full detail of the archaeological impact assessment is set out in Chapter 13 Cultural Heritage of the accompanying EIAR. The assessment was informed by a desktop study, field inspection, geophysical survey (under Licence No. 25R0081) and test excavation (under Licence No: 25E0549).

No RMPs were identified within the red-line boundary of the proposed development as part of the desk-based study and although the geophysical survey recorded several areas of enhanced magnetic responses/anomalies, the test excavation carried out confirmed that none of these anomalies were of archaeological significance.

Due to the proximity of the proposed development to the Athenry Town Centre ACA, an assessment was undertaken to consider whether there are any potential effects on the ACA. This assessment was informed by overlaying a map of the cultural heritage features within the visual buffer of the Zone of Theoretical Visibility produced by Eamonn Byrne Landscape Architects Ltd. The assessment concluded that the proposed development will have no visual effect on the view or setting of the historic town centre.

The assessment concludes that, subject to the implementation of appropriate archaeological mitigation measures during the construction phase of the project, no significant residual impacts on archaeological, architectural or cultural heritage are predicted. As such, it is considered that the proposed development aligns with Policy Objectives ARC 1, ARC 4, ARC 5 and ARC 9 of the CDP and ASP 40 of the Athenry LAP by safeguarding archaeological interests through the robust assessment of potential archaeology which informed the layout and design of the proposed development.

Furthermore, the assessment demonstrates that the proposed development will not adversely affect the significance, setting, character or visual amenity of any Recorded Monument, Archaeological Site, or the Athenry Architectural Conservation Area. Accordingly, the proposal is considered fully consistent with the heritage protection objectives of the CDP and the Athenry LAP.

7.5.9 Noise

The CDP recognises environmental noise as a significant issue affecting human health, quality of life, and the natural environment. The proposed development has been designed to fully address the noise-related requirements of the CDP and **Objectives NP3, NP4** and **NP5**. A detailed Noise and Vibration Assessment has been undertaken as part of the EIAR (refer to Chapter 9).

[4] It is assumed that the CDP is referring to an Environmental Impact Assessment Report.

This assessment considers construction, operational and decommissioning noise with particular focus on noise-sensitive locations. Construction noise sources include construction plant, machinery and construction related traffic on surrounding roads. Decommissioning noise sources are considered comparable to the construction phase. Operational noise sources primarily include operational plant noise with an element on-site vehicular activity and traffic flows to and from the development site onto the public roads.

The assessment found that no significant construction noise effects are expected for the proposed development. Notwithstanding this, various mitigation measures will be applied during the construction of the proposed development and reference will be made to BS5228 Parts 1 and 2, which offer detailed guidance on the control of noise and vibration from demolition and construction activities. Similar measures will apply at the decommissioning phase.

The Peaker Plant site operations will be subject to an IE licence issued by the EPA and therefore the guidance in EPA Guidance Note for Noise – NG4 (2016) was used to review appropriate limit values relating to the facilities operational phase. The dominant noise source in the operational phase is the gas turbine. The design of the power plant incorporates a range of effective noise controls, including the use of appropriately designed acoustic enclosure for the gas turbine and noise reducing silencers. With due consideration as part of the detailed design process, the assessment concludes that this approach will result in the site operating within the constraints of the best practice guidance noise limits at the nearest noise sensitive receptors. It is noted that all plant will be selected such that no tonal noise emissions are evident at Noise Sensitive Locations.

Accordingly, the proposed development will not give rise to significant adverse noise or vibration effects during construction or operation and is considered consistent with Policy Objectives NP3, NP4 and NP5 of the County Development Plan.

7.5.10 Air Quality

The proposed development has been assessed with regard to potential impacts on air quality, recognising the importance of maintaining ambient air standards to protect human health and the environment, as outlined in the CDP.

Consistent with Policy Objectives **AQ1, AQ2** and **AQ3** of the CDP, a comprehensive air quality impact assessment has been undertaken as part of the EIAR (refer to Chapter 7 Air). The assessment demonstrates that, subject to the implementation of proposed mitigation measures (such as dust minimisation measures), emissions associated with the construction phase of the proposed development will comply with all EU ambient air quality legislative limit values (set out in Directive (EU) 2024/2881 and the Air Quality Standards Regulations 2022).

During the operational phase, the proposed development will be subject to an Industrial Emissions Licence, which will be required for the facility to operate and is issued and regulated by the Environmental Protection Agency

(EPA). As part of the Industrial Emissions Licence, air emissions from the stack will be monitored continuously during plant operation. This monitoring will be undertaken using regulated and independently verified permanent monitoring equipment, which is subject to regular maintenance and calibration in line with statutory requirements.

The Licensee will provide these results to the EPA under the conditions of the Industrial Emissions Licence, and they will also be available to the public on the EPA's website. The EPA can make unannounced inspections to the facility at their discretion and undertake monitoring of their own to verify the accuracy of the monitoring data being reported by the Licensee.

In terms of decommissioning activities, monitoring will be undertaken in accordance with the implementation of the Closure, Restoration and Aftercare Management Plan (CRAMP), in line with EPA Industrial Emissions Licence requirements. Monitoring will remain in place for the duration of the decommissioning phase as required by the EPA. The site cannot be surrendered and formally closed until the EPA is satisfied that all closure, restoration and aftercare requirements have been met, in accordance with the Industrial Emissions Licence.

Having regard to the findings of the EIAR, the implementation of construction-phase dust mitigation measures, the operational controls and continuous emissions monitoring required under the Industrial Emissions Licence, and the EPA's ongoing regulatory oversight (including during decommissioning in accordance with the CRAMP), it is demonstrated that the proposed development will operate within applicable Environmental Quality Standards and legislative limit values. The preparation of a comprehensive Air Quality Impact Assessment and the incorporation of appropriate mitigation and monitoring measures ensure that potential impacts on ambient air quality are appropriately assessed, avoided and controlled. The proposed development therefore accords with Objectives AQ1, AQ2 and AQ3 of the CDP and complies with relevant EU and national air quality legislation.

7.5.11 Major Accidents

A Land Use Planning Assessment was undertaken by AWN Consulting to inform Chapter 15 Major Accidents and Disaster of the EIAR and is included as Appendix 15 of the EIAR. The assessment concluded that the individual location-based risk contours corresponding to tolerable levels for new COMAH establishments do not extend to an off-site work location or to an indoor area where the public are present. Therefore, it is concluded that the criteria in Table 1 of the Guidance on Technical Land Use Planning advice (HSA, 2023) are met, and the level of off-site risk at the proposed project is acceptable.

Having regard to the findings of the Land Use Planning Assessment, it is demonstrated that the proposed development satisfies the Health and Safety Authority's Technical Land Use Planning criteria for new COMAH establishments, with risk contours not extending to sensitive off-site receptors. The proposed development accordingly complies with the relevant policies and objectives of the County Development Plan relating to

major accident prevention, land use planning, and the protection of public health and safety.

8. Conclusion

This Planning Statement has assessed the Proposed Development against relevant European, national, regional, and local planning policy frameworks and objectives. This assessment demonstrates that the Proposed Development is consistent with *RED III*, the *European Green Deal 2019, European Climate Law 2021, REPower EU, Fit for 55* and *the EU Electricity Market Design Reform (2024–2026)* by supporting the integration of renewable energy into the electricity system through the provision of flexible, fast-responding backup generation capacity.

At the national level, the project aligns with the *Climate Action and Low Carbon Development (Amendment) Act 2021,* the *Policy Statement on Security of Electricity Supply 2021*, the *Climate Action Plan 2025, the National Energy and Climate Plan 2021 – 2030*, the *National Energy Security Framework 2022, Energy Security in Ireland to 2030, Ireland's Long-term Strategy on Greenhouse Gas Emissions Reduction – 2024, EirGrid Generation Capacity Statement, Climate Action Plan 2025,* the *Revised National Planning Framework* and the *Revised National Development* Plan all of which identify the need for secure, resilient, and flexible energy infrastructure to support Ireland's transition to a low-carbon, climate-resilient economy while maintaining system security.

Regionally, the development supports the objectives of the *Regional Spatial and Economic Strategy for the Northern and Western Region 2020–2032*, contributing to a secure and reliable electricity network and facilitating the integration of renewable energy in a manner consistent with Regional Policy Objectives RPO 8.1 and 8.6.

At the local level, the proposed development is consistent with the *Galway County Development Plan 2022–2028*, which recognises that an efficient and secure energy supply is essential to the future growth and sustainable development of County Galway. The project also aligns with the strategic objectives for economic development and infrastructure delivery within the Oranmore and Athenry Strategic Economic Corridor.

Extensive environmental assessment has demonstrated that all potential impacts across noise, air quality, traffic, landscape, land and soils, biodiversity, and climate have been robustly evaluated as part of the EIAR process. A comprehensive suite of avoidance, mitigation, and monitoring measures ensures that impacts are prevented at source, minimised during construction, and controlled throughout the operational lifecycle. A Natura Impact Statement also accompanies this planning application and concludes beyond reasonable scientific doubt that there will be no residual impacts and that the Proposed Development, alone or in combination with other plans and projects, will not have an adverse effect on the integrity of these, or any other, European sites.

In overall terms, the Proposed Development represents critical enabling infrastructure that supports Ireland's legally binding climate targets, renewable energy integration, and electricity system security objectives. The project is fully aligned with the relevant European, national, regional and local

policy frameworks and has been subject to comprehensive environmental assessment in accordance with statutory requirements. The EIAR and Natura Impact Statement confirm that environmental effects are appropriately avoided, mitigated and managed, with no adverse effects on the integrity of European sites. Accordingly, it is respectfully submitted that the Proposed Development accords with the proper planning and sustainable development of the area and merits a grant of permission.

Appendix 1: Details of Pre-Application Consultation with An Coimisiún Pleanála (ABP-320975-24)

Contents:

Our Case Number: ABP-320975-24

Your Reference: Bord Gais Energy

An Coimisiún Pleanála

McCutcheon Halley
Chartered Planning Consultants
6 Joyce House
Barrack Square
Ballincollig
Co. Cork
P31 YX97

Date: 26 August 2025

Re: Construction of a 300MW Open Cycle Gas Turbine plant, primarily fuelled by Natural Gas and ancillary development, including a 220kV Substation and 220kV connection from the substation to the existing Cashla 220kV Substation.
Located in Rathmorrissy/Pollnagroagh, Athenry, Co. Galway

Dear Sir / Madam,

Please be advised that following consultations under section 37B of the Planning and Development Act, 2000 as amended, the Commission hereby serves notice under section 37B(4)(a) that it is of the opinion that the proposed development falls within the scope of paragraphs 37A(2)(a) and (b) of the Act. Accordingly, the Commission has decided that the proposed development would be strategic infrastructure within the meaning of section 37A of the Planning and Development Act 2000, as amended. Any application for permission for the proposed development must therefore be made directly to An Coimisiún Pleanála under section 37E of the Act.

Please also be informed that the Commission considers that the pre-application consultation process in respect of this proposed development is now closed.

Attached is a list of prescribed bodies to be notified of the application for the proposed development.

- Minister for Housing, Local Government and Heritage
- Minister for the Environment, Climate and Communications
- Galway County Council
- Commission for the Regulation of Utilities
- Transport Infrastructure Ireland
- Uisce Éireann
- Inland Fisheries Ireland
- Office of Public Works

Teil	**Tel**	(01) 858 8100		
Glao Áitiúil	**LoCall**	1800 275 175		
Facs	**Fax**	(01) 872 2684	64 Sráid Maoilbhríde	64 Marlborough Street
Láithreán Gréasáin	**Website**	www.pleanala.ie	Baile Átha Cliath 1	Dublin 1
Ríomhphost	**Email**	communications@pleanala.ie	D01 V902	D01 V902

- An Taisce
- Heritage Council
- An Chomhairle Ealaíon
- Fáilte Ireland
- Health Service Executive

Further notifications should also be made where deemed appropriate.

In accordance with section 146(5) of the Planning and Development Act, 2000 as amended, the Commission will make available for inspection and purchase at its offices the documents relating to the decision within 3 working days following its decision. This information is normally made available on the list of decided cases on the website on the Wednesday following the week in which the decision is made.

The following information relates to challenges to the validity of a decision of An Coimisiún Pleanála under the provisions of the Planning and Development Act 2000, as amended.

Judicial review of An Coimisiún Pleanála decisions under the provisions of the Planning and Development Acts (as amended).

A person wishing to challenge the validity of a Commission decision may do so by way of judicial review only. Sections 50, 50A and 50B of the Planning and Development Act 2000 (as substituted by section 13 of the Planning and Development (Strategic Infrastructure) Act 2006, as amended/substituted by sections 32 and 33 of the Planning and Development (Amendment) Act 2010 and as amended by sections 20 and 21 of the Environment (Miscellaneous Provisions) Act 2011) contain provisions in relation to challenges to the validity of a decision of the Commission.

The validity of a decision taken by the Commission may only be questioned by making an application for judicial review under Order 84 of The Rules of the Superior Courts (S.I. No. 15 of 1986). Sub-section 50(7) of the Planning and Development Act 2000 requires that subject to any extension to the time period which may be allowed by the High Court in accordance with subsection 50(8), any application for judicial review must be made within 8 weeks of the decision of the Commission. It should be noted that any challenge taken under section 50 may question only the validity of the decision and the Courts do not adjudicate on the merits of the development from the perspectives of the proper planning and sustainable development of the area and/or effects on the environment. Section 50A states that leave for judicial review shall not be granted unless the Court is satisfied that there are substantial grounds for contending that the decision is invalid or ought to be quashed and that the applicant has a sufficient interest in the matter which is the subject of the application or in cases involving environmental impact assessment is a body complying with specified criteria.

Section 50B contains provisions in relation to the cost of judicial review proceedings in the High Court relating to specified types of development (including proceedings relating to decisions or actions pursuant to a law of the state that gives effect to the public participation and access to justice provisions of Council Directive 85/337/EEC i.e. the EIA Directive and to the provisions of Directive 2001/12/EC i.e. Directive on the assessment of the effects on the environment of certain plans and programmes). The general provision contained in section 50B is that in such cases each party shall bear its own costs. The Court however may award costs against any party in specified circumstances. There is also provision for the Court to award the costs of proceedings or a portion of such costs to an applicant against a respondent or notice party where relief is obtained to the extent that the action or omission of the respondent or notice party contributed to the relief being obtained.

Teil	**Tel**	(01) 858 8100		
Glao Áitiúil	**LoCall**	1800 275 175		
Facs	**Fax**	(01) 872 2684	64 Sráid Maoilbhríde	64 Marlborough Street
Láithreán Gréasáin	**Website**	www.pleanala.ie	Baile Átha Cliath 1	Dublin 1
Ríomhphost	**Email**	communications@pleanala.ie	D01 V902	D01 V902

General information on judicial review procedures is contained on the following website, www.citizensinformation.ie.

Disclaimer: The above is intended for information purposes. It does not purport to be a legally binding interpretation of the relevant provisions and it would be advisable for persons contemplating legal action to seek legal advice.

If you have any queries in the meantime, please contact the undersigned officer of the Commission or email sids@pleanala.ie quoting the above mentioned An Coimisiún Pleanála reference number in any correspondence with the Commission.

Yours faithfully,

PP EGM

Sinead White
Executive Officer
Direct Line: 01-8737202

PC09

Teil	**Tel**	(01) 858 8100
Glao Áitiúil	**LoCall**	1800 275 175
Facs	**Fax**	(01) 872 2684
Láithreán Gréasáin	**Website**	www.pleanala.ie
Ríomhphost	**Email**	communications@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

An Coimisiún Pleanála

Direction
CD-020506-25
ABP-320975-24

The submissions on file and the inspector's report were considered at a Board Meeting held on the 19/8/2025.

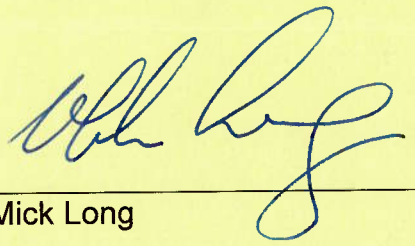
The Commission decided that the proposed 300 MW Open Cycle Gas Turbine (OCGT) plant on lands at Rathmorrissy/Pollinagroagh, Athenry, County Galway, as set out in the plans and particulars received by An Coimisiún Pleanála on the 20th January 2025 and 28th May 2025 falls within the scope of section 37B and the Seventh Schedule of the Planning and Development Act 2000, as amended, and that a planning application should therefore be made directly to An Coimisiún Pleanála.

The applicant shall be informed that the application documentation should be forwarded to the following prescribed bodies:

- Minister for Housing, Local Government and Heritage
- Minister for the Environment, Climate and Communications
- Galway County Council
- Commission for the Regulation of Utilities
- Transport Infrastructure Ireland
- Uisce Éireann
- Inland Fisheries Ireland
- Office of Public Works
- An Taisce
- Heritage Council
- An Chomhairle Ealaíon

- Fáilte Ireland
- Health Service Executive

Further notifications should also be made, where deemed appropriate.

Planning Commissioner:  **Date:** 19/08/2025

Mick Long

An Bord Pleanála

Inspector's Report
ABP-320975-24

Development	Construction of a 300MW Open cycle gas turbine plant
Location	Lands at Rathmorrissy/Polinagroagh, Athenry, Co. Galway
Planning Authority	Galway County Council
Type of Application	Pre-application consultation under section 37B of the Planning and Development Act 2000, as amended
Prospective Applicant	Bord Gáis Energy
Inspector	Philip Davis

1. Introduction

The Coimisiún received a request on the 3rd October 2024 from the prospective applicant, Bord Gáis Energy, to enter into pre-application consultations under Section 37B of the Planning and Development Act, 2000, as amended ('2000 Act'), in relation to the proposed development of a 300MW Open Cycle Gas Turbine Plant on lands at Rathmorrissy/Polinagroagh, County Galway.

The primary purpose of the pre-application consultation is to address the issue of whether or not the proposed development constitutes strategic infrastructure for the purposes of the 2000 Act.

Two pre-application consultation meetings were held with the prospective applicant on the 20th January 2025 and 28th May 2025. Records of the two meetings are on file. An email requesting closure of the consultation process was received on the 2nd July 2025.

This report provides an overview of the proposed development, as well as details of legislative provisions, and relevant precedent. My recommendation is that the proposed open cycle gas turbine plant does constitute strategic infrastructure development.

2. Site Location & Description

The site in question is agricultural grazing land of around 9.1 hectares in extent, just over 3 km west of the town Athenry in County Galway. It is on the north-east quadrant of the junction of the M6 and M18/19. The area is characterised by fields on gently rolling topography, mostly in pasture with some small areas of conifer plantation. Fields are generally bounded by ditches and patchy hedgerows, with many stone walls characteristic of limestone areas. The motorway junction - on raised embankments -is the most prominent local feature of the landscape. A third class road runs east to west north of the site, connecting to the south of Athenry. There are no houses on the site, but there are intermittent ribbons of residential development along the road network. North of the site are a number of small ponds, possibly turloughs, with the remains of a castle further north. The site is generally dry and well drained, with a farm lane connecting it to the road network to the north.

3. Proposed Development

The proposed development consists of the following main components:

- A 300 MW Open Cycle Gas Turbine (OCGT) plant primarily fuelled by natural gas, with a secondary diesel generator
- One emissions stack with a proposed height of 40-50 metres
- One 22-kV electrical transformer
- Secondary fuel (diesel) storage and transfer facilities.
- Workship, stores, carpark and administrative buildings.
- Above ground gas installation (AGI).
- Ancillary grid connection infrastructure, and
- Ancillary infrastructure including internal roads, external lighting, security fencing, etc
- Associated landscaping.

Additionally, it is proposed to have an underground connection via the local road network to the Cashla 220 kV substation – this is located some 3km to the west.

The plant is intended to operate as a peaking plant with low annual use to provide power during periods of high demand and low renewable generation availability.

4. Prospective Applicant's Case

The prospective applicant's case, as outlined in the cover letter submitted can be summarised as follows:

- It is submitted by the applicant that the proposed development qualifies under the 7th Schedule of the Planning and Development Act 2000 as it constitutes an industrial installation for the production of energy, with a heat output of 300 megawatts.

With regard to Section 37A(2), it is submitted that:

- It is strategic in nature, as it is consistent with the Climate Action Plan 2024 and will facilitate government policy as set out in the documents 'Energy

Security in Ireland 2030' and 'Irelands transition to a low Carbon Energy Future 2015-2030' and will contribute to the objectives of the NPF and the RSES, specifically policies RPO 8.1; RPO 8.3 and RPO 8.4

5. Relevant Precedents

There is no relevant planning history or precedents on file for the proposed development.

6. Legislative provisions

6.1 Planning and Development Act 2000, as amended

The Seventh Schedule of the 2000 Act as amended lists the classes of infrastructure development which, if considered by the Board (Commission) to be strategic infrastructure development, would require direct application for permission to the Board (Commission) instead of the local planning authority. This list includes under 'Energy Infrastructure':

1. Development comprising for the purposes of any of the following:

A thermal power station or other combustion installation with a total energy output of 300 megawatts or more.

An industrial installation for the production of electricity, steam or hot water with a heat output of 300 megawatts or more.

7. Consultation Meeting

Two pre-application consultation meetings were held with the prospective applicant on the 20th January 2025 and 28th May 2025. The meeting records relating to this development proposal and the presentations made by the applicant to the Board's representatives are attached to the file.

8. Assessment

The definition of 'strategic infrastructure' for the purposes of Sections 37A and 37B of the 2000 Act, as revised, includes:

> *—A thermal power station or other combustion installation with a total energy output of 300 megawatts or more.*
>
> *—An industrial installation for the production of electricity, steam or hot water with a heat output of 300 megawatts or more.*
>
> *—An industrial installation for carrying gas, steam or hot water with a potential heat output of 300 megawatts or more, or transmission of electrical energy by overhead cables, where the voltage would be 220 kilovolts or more, but excluding any proposed development referred to in section 182A(1).*

The proposed power station is intended to act as a back up peaking plant for the grid to facilitate energy intensive commercial developments within the locality. It will be fuelled by natural gas from the Gas Networks Ireland network, with a low sulphur diesel oil backup. It is to be connected to the 220kv substation at Cashla. The need for the project is set out in section 5 of the original submission – it is argued that it is fully in line with national policy and the RSES and is strategically important for the further expansion of industrial development in the region. It is acknowledged by the prospective applicant that an EIAR is required, and one is now underway. Pre-planning consultations have taken place with the planning authority and TII.

Notwithstanding its policy context, the question put to the Commission now is whether it is strategic infrastructure for the purposes of Section 37 (A and B) of the 2000 Act, as amended. The nature and scale of the proposed development constitutes an installation for the production of electricity with an output of 300 megawatts or more, so it falls under the Seventh Schedule, and as such falls under the definition of 'strategic infrastructure'.

Also, with regard to Section 37A(2), the proposed development is of sufficient size and scale and is likely to be necessary to fulfil regional economic developments that require energy security in line with the Climate Action Plan 2025, the RSES, and

related national policy on energy security and securing a low carbon energy future ('Energy Security in Ireland 2030' (published 14 November 2023, updated 12 June 2025, and 'Irelands Transition to a Low Carbon Energy Future 2015-2030 White Paper, published 19 June 2020). I note in particular the role of such peaking plants in maintaining grid stability and demand peaks in the context of an electrical system with a high dependency on renewables. As such, I concur with the argument put forward by the prospective applicant that the proposed development can be considered to be of strategic economic importance to the region and would contribute substantially to the fulfilment of objectives set out in the NPF and RSES with regard to energy resilience.

In conclusion, therefore, I recommend that An Coimisiún issues a determination that the proposed 300 MW OCGT plant falls within the scope of section 37B of the 2000 Act, as amended, and that a planning application should be made directly to the Coimisiún.

A list of prescribed bodies is set out in Appendix 1.

9. Recommendation

I recommend that the prospective applicant, Bord Gáis Energy, be informed that:

> The proposed 300 MW Open Cycle Gas Turbine (OCGT) plant on lands at Rathmorrissy/Pollinagroagh, Athenry, County Galway, as set out in the plans and particulars received by An Coimisiún Pleanála on the 20th January 2025 and 28th May 2025 falls within the scope of section 37B and the Seventh Schedule of the Planning and Development Act 2000, as amended, and that a planning application should therefore be made directly to An Coimisiún.

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.

Philip Davis

Senior Planning Inspector

Date: 31st July 2025

Appendix 1: Prescribed Bodies

The following is a list of prescribed bodies considered relevant by the Coimisiún:

- Minister for Housing, Local Government and Heritage
- Minister for the Environment, Climate and Communications
- Galway County Council
- Commission for the Regulation of Utilities
- Transport Infrastructure Ireland
- Uisce Éireann
- Inland Fisheries Ireland
- Office of Public Works
- An Taisce
- Heritage Council
- An Chomhairle Ealaíon
- Fáilte Ireland

Further notifications should also be made, where deemed appropriate.

An Bord Pleanála

Record of 1st Meeting ABP-320975-24

Case Reference / Description	ABP-320975-24		
Case Type	Pre-application Consultation		
1st / 2nd / 3rd / 4th Meeting	1st		
Date	20/01/2025	**Start Time**	14:00 hrs
Location	Virtual	**End Time**	14:43 hrs

Representing An Bord Pleanála
Staff Members
Sarah Lynch, Assistant Director of Planning (Chair)
Phil Davis, Planning Inspector
Raymond Muwaniri, Executive Officer

Representing the Prospective Applicant
Mairi Henderson, Director, McCutcheon Halley Planning
Muireann Carrol, Planning Consultant, McCutcheon Halley Planning
Owen Zamboglou, Project Manager, Bord Gais Energy
Olivia Holmes, Project Officer, Bord Gais Energy
AJ Brown, Project Manager, Atkins Realis
Deirdre Larkin, EIAR Coordinator, Atkins Realis

Introduction

The Board referred to the letter received from the prospective applicant on the 3rd of October 2024 requesting pre-application consultations under Section 37B of the Planning and Development Act 2000, as amended, and advised the prospective applicant that the first meeting constituted an information-gathering exercise for the Board. It also invited the prospective applicant to outline the nature of the proposed development and to highlight any matters that it wished to receive advice on from the Board. The Board's representatives mentioned the following general procedures in relation to the pre-application consultation process:

- The Board will keep a record of this meeting and any other meetings, if held. Such records will form part of the file which will be made available publicly at the conclusion of the process. The record of the meeting will not be amended by the Board once finalised, but the prospective applicant may submit comments on the record which will form part of the case file.
- The Board will serve notice at the conclusion of the process as to the strategic infrastructure status of the proposed development. It may form a preliminary view at an early stage in the process on the matter.
- A further meeting or meetings may be held in respect of the proposed development.
- Further information may be requested by the Board and public consultations may also be directed by the Board.
- The Board may hold consultations in respect of the proposed development with other bodies.
- The holding of consultations does not prejudice the Board in any way and cannot be relied upon in the formal planning process or in any legal proceedings.

Presentation made by the prospective applicant:

Bord Gais Energy is proposing the development of a 300MW open cycle gas turbine plant, 1 no. emissions stack, 220kV air insulated switchgear electrical substation, electricity transformer, grid connection and above ground gas installation. The site is on agricultural grassland in relatively flat topography, located 3.5km west of Athenry, County Galway. Permission is being sought for 25 years, after which the development may be decommissioned or recommissioned.

Two grid connection routes have been considered for the connection. The grid connection route mostly follows existing roads, but some sections will go through private lands. The grid connection route is still to be finalised. Alternatives are being assessed as the cables need to cross the motorway, so the application may include different options for grid connection route. The development is adjacent to the M17-M18 and M6 motorway and will be visible to passing traffic. Mitigation for nearby residents is being explored. Archaeological surveying and testing are being undertaken as part of the EIAR process.

The development requires oversized loads to be delivered to the site. There are currently 2 route options for site access being explored. A delivery route assessment and TIA will be undertaken, and the CEMP and CTMP will accompany the application. The EIAR will determine the construction route. No significant environmental sensitivities have been identified on initial scoping. The area is grassland and has a low ecological value. There is no known flooding in the area and the nearest residential developments are approximately 830m north of the gas turbine plant. The development will be subject to an IED licence from the EPA. Noise and air emissions will be compliant with legislation and consenting requirements. A land use planning assessment will also accompany the application.

The application is expected to be submitted to the Board by August 2025. It is anticipated that construction will take at least 2 years to complete, the project to be operational by 2028.

Discussion:

- The Board's representatives explained to the prospective applicant that if they are considering more than one option that they will need to request an opinion from the Board on design flexibility. If not, only one option can be submitted with the application. The prospective applicant stated they may request an opinion on design flexibility from the Board.

- The Board's representatives queried why the prospective applicant is going with open cycle instead of closed cycle, and noted that this may have implications under the Climate Change Act.

- The prospective applicant outlined a number of environmentally sensitive issues to be addressed in the EIAR. They have identified environmental constraints in the geological surveys, and geology investigations are ongoing. The Boards representatives noted that the area is karst limestone and a full investigation of potential karst features including caves would be required. The EIAR and ecological surveys will be vital.

- The Board's representatives reminded the prospective applicant to confirm that the haul routes have the capacity for the weight of the delivery loads. They reiterated that if the prospective applicant has 2 options, they need to engage in the design flexibility consultation process.

- The Board's representative advised the prospective applicant to set up a meeting as soon as possible if they are considering design flexibility. The prospective applicant mentioned that more work needed to be done on the routes they are considering.

Conclusion:

The Board's representatives advised that onus is on the prospective applicant to either request a further meeting or formal closure of the instant pre-application consultation process. The Board's representatives advised that the record of the instant meeting will be issued in the meantime and that the prospective applicant can submit any comments it may have in writing or alternatively bring any comments for discussion at the time of any further meeting.

Sarah Lynch

Assistant Director of Planning

An Bord Pleanála

Record of 2nd Meeting
ABP-320975-24

Case Reference / Description	Construction of a 300MW Open Cycle Gas Turbine plant, primarily fuelled by Natural Gas, and ancillary development, including a 220kV Substation and 220kV connection from the substation to the existing Cashla 220kV Substation. Located in Rathmorrissy/Pollnagroagh, Athenry, Co. Galway		
Case Type	Pre-application consultation		
1st / 2nd / 3rd / 4th Meeting	2nd Meeting		
Date	28/05/2025	**Start Time**	11:00am
Location	Virtually	**End Time**	12:00pm

Representing An Bord Pleanála
Sarah Lynch, Assistant Planning Director
Philip Davis, Senior Planning Inspector
Sinead White, Executive Officer
Raymond Muwaniri, Executive Officer

Representing the Prospective Applicant
Keith Johnson
Muireann Carroll
Owen Zamboglou
Paula Galvin

Sinead Hickey
Mairi Henderson
Alan Brodie
Cormac Woods
Deirdre Larkin
Gareth O'Hare
Avril Mcollom
Nik Dewhirst

Introduction

The Board referred to the letter received from the prospective applicant on the 3rd October 2024, requesting pre-application consultations under section 37B of the Planning and Development Act 2000, as amended, and advised the prospective applicant that the meeting essentially constituted an information-gathering exercise for the Board. It also invited the prospective applicant to outline the nature of the proposed development and to highlight any matters that it wished to receive advice on from the Board.

The Board's representatives outlined the following general procedures in relation to the pre-application consultation process:

- The Board will keep a record of this meeting and any other meetings, if held. Such records will form part of the file which will be made available publicly at the conclusion of the process. The record of the meeting will not be amended by the Board once finalised, but the prospective applicant may submit comments on the record which will form part of the case file.

- The Board will serve notice at the conclusion of the process as to the strategic infrastructure status of the proposed development. It may form a preliminary view at an early stage in the process on the matter.
- A further meeting or meetings may be held in respect of the proposed development.
- Further information may be requested by the Board and public consultations may also be directed by the Board.
- The Board may hold consultations in respect of the proposed development with other bodies.
- The holding of consultations does not prejudice the Board in any way and cannot be relied upon in the formal planning process or in any legal proceedings.

Presentation made by the prospective applicant:

The presentation began by the prospective applicant introducing their team and the nature of the application. They also went through the agenda for the meeting.

The prospective applicant gave a summary of the progress of the application in relation to the proposed development thus far, including that Environmental Impact Assessment consultation is currently underway and that a meeting was held with Galway County Council regarding construction haul routes for the project. Drawings and documents are being prepared for the prospective application, and it is hoped to submit the application in August 2025, if the proposed development is decided by the Board to be Strategic Infrastructure Development.

The prospective applicant discussed the proposed grid connection routes and highlighted that the route option to the east of proposed development following the minor road network is the one they intend to use for the proposed development.

The prospective applicant discussed the proposed layout of the development in detail, how the turbines are fuelled and highlighted that there is no storage of gas onsite, with a direct connection to the national gas grid being used to suppy the gas. The locations of the control building and workshop building were also highlighted. Diesel fuel will be stored on the site in accordance with Eirgrid requirements for backup supply in the event of a disruption to gas supplies.

The prospective applicant went on to discuss their stakeholder engagement project and the website launched April 2025. Public Information events were held in a local hotel within the area to maximise attendance and awareness. Leaflets were distributed within a 2km radius and there has been communication with local TD's and community stakeholders as well as newspaper and poster advertising. Feedback was received at the public information events, and it is thought that it is likely there will be a community group that may be opposed to the development.

The prospective applicant went on to discuss the Construction Traffic Management Plan methodology. It was said that data collection and scoping is to be completed for delivery routes, the number and scales of loads for assessment in the EIAR will need to be identified, and a Construction Traffic Management Plan report will also be prepared.

The prospective applicant stated that specifying full details of haul routes will be included in the application and it is proposed that a traffic management plan will be submitted with the application. This will include information on any abnormal load deliveries.

The presentation was concluded by the prospective applicant highlighting an error in 1st Meeting record regarding red lining a route, it is confirmed that this was not stated at the meeting and was included in the meeting record in error.

Discussion:

- The prospective applicant stated that they wish to apply for planning permission without a limit on the operational duration period, one reason being that the main plant components have an operational life well in excess of 25 years, due to low annual hours of operation.

- The Board's representatives stated that the application must be consistent with the current Climate Action Plan and advised the prospective applicant to be mindful of the wording of their request. The Board's representatives also advised the prospective applicant to consider the required duration of the permission having regard to the involvement of fossil fuels in the proposed development.

- The prospective applicant stated that they will take this advice on board and a permanent permission is hoped for but if it is more appropriate to define a time, a 40-year permission could be considered.

- The Board's representatives asked if a direct route for the underground cabling to the Cashla Substation along the M6 had been considered.The prospective applicant stated that there had been alternative routes considered including the M6 alignment but initial inquiries indicate that no permission from landowners or statutory authorities would be forthcoming for a more direct route.

- The Board's representatives asked if the construction haul route will follow the proposed new access track to the north. It was confirmed that this is the probable alignment.

- The applicant confirmed that there would be no storage of natural gas on the site. Only diesel fuel will be stored on the site.

- The Board's representatives asked if the HSA had been engaged with regarding the proposed development. It was also advised that the HSA can get involved in these cases at application stage, however, this can slow down the process so it would be best practice to consult the HSA prior to submitting the application.

- The prospective applicant stated that the HSA have been contacted in relation to consultation. There are further risk assessments to take place, and it is intended that the HSA will be contacted again in relation to this.

- The Board representatives concluded the meeting by advising the prospective applicant that if any karst features such as turloughs or caves have been identified on the lands, these need to be addressed in detail in the Environmental Impact Assessment report.

- The prospective applicant asked about the process of closing the pre-application consultation stage and how long it would take to get a decision. They stated they would be likely to request closure once they received the meeting record for the meeting as they hope to submit the prospective application in early August.

- The Board's representatives advised it could be around 6-8 weeks for a decision.

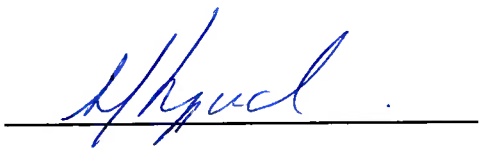
- The prospective applicant asked who to contact if they had any queries regarding the validation process.

- The Board's representatives concluded the meeting by advising that any questions regarding the application process could be emailed to SIDS@pleanala.ie for the attention of Sinead White.

Conclusion:

The Board's representatives advised that the onus is on the prospective applicant to either request a further meeting or formal closure of the instant pre-application consultation process. The Board's representatives advised that the record of the instant meeting will be issued in the meantime, and that the prospective applicant can submit any comments it may have in writing or alternatively bring any comments for discussion at the time of any further meeting.

The Meeting concluded at 12:00pm.



Sarah LynchAssistant Director of Planning

Appendix 2: Mason Hayes Curran Letter

MASON HAYES & CURRAN

Barrow Street
Dublin 4, Ireland
D04 TR29
DX11 Dublin
+353 1 614 5000
dublin@mhc.ie

Bord Gáis Energy Limited
1 Warrington Place
Dublin 2

February 2026 **Our ref:** MHC/43206.34

MHC-39634763-1

Matter: Cashla Peaker Plant Development (the "Proposed Project")

1 Introduction

1.1 This letter is provided to supplement and support the planning application for the Proposed Project.

1.2 This letter considers the legal framework and national policy supporting the Proposed Project, in particular the national target of '*at least 2 GW*' new flexible gas plant by 2030 as provided for in Chapter 11 of the Climate Action Plan 2025.[1]

2 The Climate Act

2.1 The Climate Action and Low Carbon Development Act 2015 was amended by the Climate Action and Low Carbon Development (Amendment) Act 2021 (together the "**Climate Act**")

2.2 Section 15 of the Climate Act states that:

> *"15. (1) A relevant body shall, in so far as practicable, perform its functions in a manner consistent with—*
>
> *(a) the most recent approved climate action plan,*
>
> *(b) the most recent approved national long term climate action strategy,*
>
> *(c) the most recent approved national adaptation framework and approved sectoral adaptation plans,*
>
> *(d) the furtherance of the national climate objective, and*

[1] https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/climate-action-plan-2025/

MASON HAYES & CURRAN

(e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State".

2.3 Section 15 of the Climate Act provides that the Government and State's climate objectives shall be considered "*in so far as practicable*".

3 Climate Action Plan ("**CAP25**")

3.1 CAP25 sets a target of delivering '*at least 2 GW'* of new flexible gas plant by 2030.

3.2 It is recognised that based on current consents granted at the time of the planning application for the Proposed Project, Ireland appears to be on target to reach the 2GW minimum of new flexible gas generation projects. However, it must also be recognised that the majority of consents granted have yet to be constructed. In reality, there is no guarantee that these projects will be built in a timely manner or indeed if all permissions granted to date will be implemented.

3.3 Several key factors can influence if a permitted development is constructed including financing, grid connection allocation of a capacity contract, planning delays such as judicial reviews, contractor, skills and materials availability, and costs. These are factors that are outside of the control of a developer and are entirely separate to the grant of planning.

3.4 Given the broad scope of factors that can influence the progression of permitted development, there must be a recognised attrition rate for same. As set out in section section 34(13) of the Planning and Development Act 2000 (as amended):

> "*A person shall not be entitled solely by reason of a permission under this section to carry out any development."*

3.5 Section 2.1 of CAP25, sets out '*Trends in Ireland's Emissions to Date'*:

> "The sectoral makeup of our emissions has changed considerably since 1990. Emissions in the transport sector increased by 129.2% to 2023 driven by a high reliance on private car travel as well as rapidly increasing road freight transport. On the other hand, emissions from electricity generation fell by 32.1% during a timeframe where electricity consumption grew by 164%. This was driven by more efficient gas-fired power plants replacing older peat and oil-fired plants, an increased share of renewables, and increased interconnectivity"
>
> (emphasis added)

3.6 In addition, CAP25 explicitly references the policy document '*Energy Security in Ireland to 2030*', as follows:

> *"In November 2023, Energy Security in Ireland to 2030, was published. This sets out the strategic approach to ensure a secure transition for Ireland's energy systems, in line with our climate objectives, and sets out the energy security related actions to be taken out to 2030".*

MASON HAYES & CURRAN

3.7 The policy document "*Energy Security in Ireland to 2030*"[2] supports the use of gas as part of the energy transition, including the addition of new gas-fired generation such as the Proposed Project, as flexible back-up on the electricity system.

3.8 It is clear from the above that CAP25 clearly supports the Proposed Project. As further set out in Chapter 8 – Climate (sections 8.4 and 8.6) of Volume 2 of the EIAR the Proposed Project is designed to work in partnership with and support renewable energy generating projects to ensure energy security during the transition to a net zero economy.

3.9 In addition, it is important to note that the Proposed Project has been allocated a capacity contract in the 2028 / 2029 T-4 Capacity Auction. The importance of this is twofold. Firstly, this is an important requirement outside of planning to facilitate development, as set out at section 3.3 above.

3.10 Secondly, it is notable that the capacity auctions, run by EirGrid and SONI in their roles as Transmission System Operators in Ireland and Northern Ireland respectively, through the joint venture SEMO (Single Electricity Market Operator) were designed by the electricity regulators in Ireland and Northern Ireland to ensure sufficient capacity is secured to meet demand across the island.

3.11 The 2028 / 2029 T-4 Capacity Auction, as set out in the Capacity Auction Results Report dated 16 January 2025[3], awarded the Proposed Project its capacity contract. Auction requirement quantities identified in this auction incorporated all successful existing MW of gas turbine technology into the assessment identifying the requirement for new capacity, in order to maintain security of supply on the system. It should be noted that auction required quantities were adjusted by the Regulatory Authorities to account for various considerations such as reserves and non-participating capacity.

4 National Policy

4.1 As set out in section 10.1.7 of CAP 25:

> *"The planning system plays an integral role in meeting the National Climate Objective and having a vertically integrated policy framework that supports the actions in this Climate Action Plan is critical. From a national planning policy perspective, the National Planning Framework (NPF) provides an established means through which to implement and integrate climate change objectives, including adaptation, at national, regional, and local levels, and the transition to a low carbon and climate resilient society.*
>
> *The NPF sits at the top of the planning hierarchy and provides the overarching context for the regional and local tiers below it, thereby securing the alignment of policies and*

[2] https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/energy-security-in-ireland-to-2030/

[3] https://www.sem-o.com/sites/semo/files/documents/general-publications/20282029-T-4-Final-Capacity-Auction-Results-Report-FCAR2829T-4.pdf

objectives as part of the plan-making process, including alignment with the Climate Action Plan."

4.2 The Revised NPF also highlights the need for a diversified energy portfolio from multiple sources including gas, to underpin the growth of renewable electricity and safeguard energy security.[4] The Proposed Project directly contributes to these objectives by enabling the transition to a low-carbon energy system.

4.3 Finally, it should be noted that the Proposed Project falls squarely within Government policy, enabling and supporting the decarbonisation of energy systems, as set out in the Policy Statement on Security of Electricity Supply (November 2021)[5] and the CRU Information Paper: Security of Electricity Supply Programme of Actions (September 2021). The Proposed Project comprises Gas Powered Turbine Peaking Plant that will provide back-up electricity to the national grid.

4.4 The Proposed Project is further supported by national and European policy as set out in Chapter 8 – Climate (sections 8.3.1.2.1 - 8.3.1.2.2) of Volume 2 of the EIAR submitted with the planning application for the Proposed Project.

5 Coolglass Wind Farm Limited v An Bord Pleanála [2026] IESC 5

5.1 For completeness, we refer to the decision of the Supreme Court in *Coolglass Wind Farm Limited v An Bord Pleanála* [2026] IESC 5 dated 4 February 2026 in relation to the obligations on a relevant body under section 15 of the Climate Act, as set out at section 2 above.

5.2 In the High Court's judgment in *Coolglass* [2025] IEHC 1, Humphreys J acknowledged that *"the concept of net zero implies a continuing necessity for some emissions in the short term at least"* and that *"there will be other imperatives of economic necessity that require projects that, in and of themselves, wouldn't support climate goals in isolation"*.

5.3 In this respect, we refer to the following extracts from that judgment: -

> *"119. The logical implication of that is that s15 applies to the board as it applies to other relevant bodies and as other provisions of the legislation apply to central and local government. It imposes an obligation to act consistently with the climate plans and objectives referred to in s15 insofar as practicable. That does not mean allowing an application which is prohibited by law. That wouldn't be practicable apart from anything else. But it does mean exercising discretionary and evaluative powers in whatever way is most likely to be consistent with the relevant plans and objectives.*
>
> ***132. I do need to emphasise that the obligation to use discretionary powers favourably to renewable energy infrastructure does not automatically translate into an obligation to refuse permission for developments that cause emissions**.*

---

[4] Page 133, revised NPF April 2025 https://www.npf.ie/first-revision-to-the-national-planning-framework/national-planning-framework-first-revision-april-2025/

[5] https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/policy-statement-on-security-of-electricity-supply/

> *One can see an argument as to why the board would not be required to start from a position of scepticism in relation to projects causing emissions to quite the same extent as it should start from a presumption of favourability regarding renewable projects. We can save detailed consideration for a case in which it arises but there are two obvious reasons for this:*
>
> *(i)* ***The concept of net zero implies a continuing necessity for some emissions in the short term at least. That relates to the fact that pending complete adaptation of the economy, there will be other imperatives of economic necessity that require projects that, in and of themselves, wouldn't support climate goals in isolation****. Energy security to enable the ongoing orderly functioning of society, especially in the context of the Russian Federation's full-scale criminal war of aggression against Ukraine, is one example.*
>
> *(ii) Even if a project is not in itself driven by such an imperative, one has to be conscious of displacement effects. Refusal of a project in Europe may simply have the effect of the project being relocated to a jurisdiction with lower environmental standards, thus producing more emissions overall. Emissions are definitionally a cumulative global problem, so while refusing such projects feels good in the moment, it may or may not be doing anything to combat climate change. Rightly or wrongly, that was an explicit part of my thinking in An Taisce v. An Bord Pleanála [2021] IEHC 254, [2021] 7 JIC 0205 (Unreported, High Court, 2nd July 2021). Such an approach doesn't particularly give one a feeling of virtue, but it makes a certain amount of sense depending on the context.*
>
> ***133. In other words, it doesn't automatically follow from a pro-renewables interpretation that there must be, say, an anti-cheese factory interpretation, an anti-data centre interpretation or an anti-LNG storage interpretation. The trade-offs and displacement effects would need to be considered".***
>
> (emphasis added)

5.4 The Supreme Court upheld the High Court's decision in *Coolglass*, although it did not fully agree with the High Court's reasoning. That said, the Supreme Court did agree with the High Court in finding that the concept of net zero does allow for emissions generating projects. At paragraph 86 of the Supreme Court's judgment it states:

> *"****The second reason the judgment gives is more important. It acknowledges that the concept of net zero contemplates a balance between projects, and can encompass some which may be emission generating, but are of particular economic, social, and community advantage, and other projects****. Because the national climate objectives are stated as a total global figure, the refusal of permission for a particular project which is said to be climate friendly, and* ***the grant of permission for one which may create greenhouse gases, may still be consistent with the overall achievement of climate targets****. A target is a net one to be assessed globally. But if that is so, and it is, the qualified consistency obligation imposed by s. 15(1) cannot be the sole or even principal determinant of the refusal or grant, or grant subject to conditions (subject to practicability) of planning permission. Considerations of proper planning and sustainable development are necessarily*

MASON HAYES & CURRAN

taken into account in any decision, and ***the High Court judgment correctly recognises that emission creating developments may be properly permitted****."*

(emphasis added)

5.5 These statements from the *Coolglass* judgments align with the current abundance of national policy supporting the Proposed Development, as set out in the application documentation and at sections 3 and 4 above.

5.6 The Supreme Court's judgment confirms that there may be projects which result in emissions, but which should not necessarily be refused on the basis of emissions. The obligation is on the decision maker to ensure its decision is consistent with the policies and objectives listed in s15 of the Climate Act in so far as practicable. The Supreme Court confirmed at paragraph 118(ii) of its judgment that this obligation to ensure consistency in so far as practicable involves more than an obligation to "have regard to" the climate objectives referred to in section 15.

5.7 Peaking plants are only required to provide power for limited durations when wind or solar energy cannot meet demand, such as the Proposed Project, they support the development and integration of renewable generation infrastructure and are therefore consistent with the Climate Action Plan and necessary for the security of Ireland's energy supply. The transition to renewable energy would not be possible without such back-up infrastructure.

5.8 It should also be noted that in the more recent High Court case of *Friends of Kilmoney v An Bord Pleanala* [2025] IEHC 407, Humphreys J made observations about projects that cause emissions and how decision makers should deal with the same. In this respect, we refer to the following extracts from the judgment:

"172. Some potential considerations are as follows:

(i) All consent functions have to be exercised as far as practicable in a manner consistent with climate goals – as required by s15 of the 2015 Act as amended by the 2021 Act.

(ii) Compatible essentially means contributing to the goals set out. Thus a project has to be either climate-neutral (not causing emissions, or any emissions being balanced by off-sets), ***or else provided for in the relevant climate action plan (either as a specific project or as part of a category of projects which are sufficiently identifiable by size and number such that the commission can determine whether any individual grant of permission would be compatible with the plan)****. The commission is not a catch-all national policy-making body – Government has to be specific enough to allow the commission to make individual decisions. In the absence of specificity the commission may not be able to come lawfully to a conclusion of consistency.*

(iii) The commission's conclusion that the project is compatible with such goals can be challenged if irrational or unreasoned, or if based on flawed reasons.

(iv) Only the additional GHG emissions of the project are crucial, bearing in mind that the scenario of no consent is not normally one of no emissions but of an alternative

(sometimes higher) level of emissions. Displacement effects such as relocation of projects may be relevant in some cases but in other cases relocation may not lead to higher emissions given the continually intensifying global focus on renewable energy and the many areas of the world where renewables are more readily accessible than here (solar energy in the tropics, geothermal power in Iceland, and so on).

(v) Consistent with the 2015 Act, ***the commission may determine that it is not practicable to ensure compliance with climate goals. This may arise by virtue of imperative requirements of social order such as energy security or other essential infrastructure, or even where energy projects based on fossil fuels are required to stabilise the grid during periods when the winds are not blowing, to put it colloquially****…"*

(emphasis added)

6 Conclusion

6.1 The Proposed Project is assisting to advance Ireland's energy transition goals in conformity with both the current Climate Action Plan and the obligations under the Climate Act.

MASON HAYES & CURRAN LLP

Appendix 3: Galway County Council Meeting Minutes 13th February 2025

Comhairle Chontae na Gaillimhe
Galway County Council

SID pre-planning meeting, Bord Gáis Energy (Rathmorrissy and Pollnagroagh, Athenry, Co. Galway)

Minutes of Meeting – Thursday 13/02/2025 at 10:30 a.m. via MS Teams

Present:

Bordgais (applicant)
Olivia Holmes
Owen Zamboglou

Atkins Realis (Engineers and EIAR Consultants)
AJ Brown, Engineering Project Lead
Nik Dewhirst, Senior Civil Engineer
Deirdre Larkin, EIAR Co-ordinator
Avril McCollom, Environmental Consultant

AWN Consulting (Climate Chapter of EIAR)
Jovanna Arndt, Climate Consultant
Edward Porter, Director of Air Quality Climate section of AWN Consulting

McCutcheon Halley (Planning Consultants)
Màiri Henderson
Muireann Carroll

Galway County Council
Liam Hanrahan, Director of Services, Planning Section, Galway County Council
Patrick O'Sullivan, A/Senior Executive Planner, Planning Section, Galway County Council
Tina Ryan, Climate Change Co-Ordinator, Climate Change, Galway County Council
Rebecca Mooney, Climate Action Officer, Climate Change, Galway County Council
Colette Cronin, Executive Technician Environment, Galway County Council
Ivana Arsic, Assistant Staff Officer, Planning Section, Galway County Council

Apologies:
Valerie Loughnane, Senior Planner, Planning Section, Galway County Council
Robert Lundon, Executive Engineer Roads and Transportation, Galway County Council
Fintan Donnelly, Assistant Scientist, Environment, Galway County Council

The meeting commenced with a brief introduction.

Ms. Holmes and Ms. Handerson delivered the presentation on the proposal.

Ms. Holmes provided an overview of the applicant's background and outlined the need for the proposed project.

Applicant's background

- Bord Gáis Energy, part of Centrica Group, is one of Ireland's leading energy companies, serving Irish families and businesses for nearly 50 years.
- Committed to playing a key role in Ireland's energy transition - aiming to be net zero by 2040 and helping its 730,000 customers reach net zero by 2050.
- Operates 430 MW Combined Cycle Gas Turbine (CCGT) at Whitegate.
- Two 100MW dual fuel Peaker plants nearing completion of construction - Athlone and Profile Park.

Need for the Project

The project will play a key role in developing future renewables and is grounded in policy.
Flexible gas generation is recognised as a necessary part of the energy transition to Net Zero.

National Level

- The Government's Policy Statement on Security of Electricity Supply acknowledges that conventional power generation is needed to support the growth of renewable energy.
- The Government of Ireland Climate Action Plan 2024 sets a key national target to have at least 2GW of new flexible gas generation by 2032 to deliver, accelerate and manage a flexible system to support renewables.
- EirGrid identified a shortfall in Ireland's Electricity Supply / Demand Balance (Ten Year Generation Capacity 2023-2032).
- CRU's information paper on the Security of Electricity Supply 2021 - supports the procurement of 2,000 MW of additional gas plant capacity to increase Security of Supply in Ireland.

Local Level

- GCDP (2022-2028) Policy objective CC supports the transition to increasing renewable energy and improving energy efficiency.

Key objective of the development is:

- To facilitate expansion of renewable generation while maintaining security of supply via the provision of flexible electricity generation.
- Natural gas Peaker plants play a crucial role in stabilising the energy grid, especially as renewable energy sources become more prevalent. Provide rapid, flexible power during peak demand, ensuring reliability while supporting the broader renewable energy transition.
- Proposed Gas-fired Peaking Power Plant will support electrical grid, running only during periods of high demand.
- Connection to the electrical grid has been approved by EirGrid for a 10-year contract (Oct 2028 - Sept 2038).
- Plant to be operational to meet EirGrid's requirements for 2028/2029 Capacity year.

Ms. Handerson provided an overview of the following:

The Site Location Map was presented

- Site located c. 3.5 km west of Athenry, adjacent the M17-M18 & M6 motorway.
- Site suitable given proximity to gas pipeline, existing electrical substation (Cashla) and road network.
- Cashla is an important node on the electrical grid, this power plant will help strengthen supply to the substation. Suitability of connection to Cashla has been approved by EirGrid.

Overview of Proposed Development

- 320 to 340 MW open cycle (simple cycle) gas turbine plant
- *1 no. emissions stack 40-45 m high*
- *220 kV Air Insulated Switchgear (AIS) Electrical Substation*
- *Electrical transformer*
- *Grid connection to existing ESBN Cashla 220 kV substation*
- *Above-ground gas installation (AGI) - planning application to Galway County Council for this element is to be progressed separately by Gas Networks Ireland within the next 6 to 12 months*
- Permission sought for an operational period of 25 years.
- Development will be future proofed to facilitate adaptation via. alternative gas mixes as technology evolves (hydrogen/ hydrogen blend, low carbon ammonia, etc).
- Open Cycle plants have fast ramp up speeds, making them compatible with a transition to renewable energy as they 'fill the troughs' in renewable power generation.

Project overview map was presented detailing development site location, potential cable route (preliminary option for grid connection), potential access and cable wayleave, existing gas transmission line, Cashla sub-station, M6, M17 & M18 motorway.

Indicative Layout map was presented detailing DRAFT Proposed Development.

Site Photographs

- Site is agricultural grassland.
- Relatively flat topography.
- Some limited hedgerows and a few mature trees along northern boundary.
- Immediately adjacent to Junction 17 of M17-M18 & M6 motorway.

Preliminary Planning Issues

- Grid Connection Route to be finalised.
- *Alternatives are being assessed. Application may need to include options for grid connection. The cables will need to cross the motorway.*
- Archaeology - main site subject to intense reclamation works. Access /grid routes traverse greenfield. NMS features in the wider area.
- *Archaeological surveying and testing are being undertaken as part of the EIAR.*
- Visual Impact - development is adjacent to the motorway and will be visible to passing traffic.
- *Optimised siting and configuration of power plant. Landscape proposals and a full LVIA will form part of the application*.

- Construction Access - development includes some heavy plant, which will be oversized loads be delivered to the site.
- *A full delivery route assessment and TIA will be undertaken and a CEMP and CTMP will accompany the application. There are currently two options for site access being explored.*
- Environmental Sensitivities
- *Closest residential development approx. 830m north of the plant site.*
- *Site of low ecological value. Biodiversity enhancement measures will be incorporated into the project design.*
- *No known flooding on site. Nature-based drainage solutions will be incorporated into the design philosophy.*
- *Hydro-geologically the site is deemed to be vulnerable, with rock at or near surface or Karst. Foundation design will be informed by geotechnical investigation and developed with appropriate mitigation.*
- *The development will be the subject of an IED licence from the EPA.*
- *Noise and air emissions will be compliant with legislative and consenting requirements.*
- *An assessment of construction and operational stage activities likely to produce GHG emissions will form part of the ElAR.*
- COMAH
- *Lower tier COMAH establishment.*
- *Land-use planning assessment will accompany the application.*
- *Consultation with Health and Safety Authority.*
- Programme
- *As per Capacity Auction, project must be operational by October 2028. Anticipated construction duration of at least 2 years. Application to be lodged August 2025, Anticipated ABP decision - Autumn 2026.*

SID Application Preparation

- EIAR to assess full project (power plant, on-site sub-station, AGI and grid connection).
- Engineering and ElAR survey work commenced in December 2024.
- Consultation with An Bord Pleanála has commenced - 1st PAC held 20th January 2025.
- *Application to include justification for Open Cycle element, as opposed to Closed Cycle.*
- *Likelihood of Karst features noted.*
- *Haul routes are to be investigated, including weight bearing capacity of haul routes.*
- *Design Flexibility route may be required if more than one grid option is proposed.*
- Public Consultation Strategy
- *Outline Plan has been developed by Bord Gáis Energy and Consultants*
- *Consultees include but are not limited to:*
    - *Landowners and local residents,*
    - *Local community groups and elected representatives,*
    - *Statutory stakeholders and prescribed bodies including the EPA, CRU, Uisce Éireann, TII, HSA, NPWS, NMS, Gas Networks Ireland.*

Mr. Hanrahan has highlighted the importance of robust community consultation for this project, and emphasised that it is critical to conduct meaningful, localised engagement. This

should include in-person drop-in sessions, recorded engagements, and other interactive methods to genuinely involve the community.
Mr. Hanrahan suggested reviewing the community consultation processes for the Tynagh and Coolpowra applications. Both cases illustrate how inadequate consultation can undermine a project's acceptance. Coolpowra's approach-relying on limited outreach and delayed community consultations-proved highly problematic, leading to significant criticism from local councillors and residents. This demonstrates that launching a website alone does not suffice, especially in rural areas where direct interaction is essential. Our councillors will carefully assess the quality of community engagement and will include their observations in our report to An Bord Pleanála.

Mr. Hanrahan additionally addressed the following concerns:

1. Traffic and Road Access:

The site's proximity to the motorway necessitates engagement with Transport Infrastructure Ireland (TII), as well as coordination with our Road Section regarding the L-road. Access via the side of the farm, which runs parallel to the motorway, may present safety risks, particularly with potential glare and light confusion for motorway users. A traffic analysis and alternative access plans, such as utilising the entrance near the coffee depot, should be explored.

2. Visual Impact:

Given the site's visibility-especially on the Athenry side of the motorway-detailed visual representations and mitigation strategies are crucial. The Coolpowra project serves as an example where initial consultations promised minimal visual impact (one tower), but subsequent plans showed multiple towers, resulting in significant community and councillor opposition. Clear, accurate visuals from the outset, displayed locally, would help manage expectations and minimise concerns.

3. Engagement Standards:

As a reference, please review the Dexcom development, which successfully integrated thorough consultation, visual analysis, and detailed motorway impact studies.
Once your application is lodged, we will bring it through the municipal district for further comment. This process ensures local councillors can provide input, which will then be incorporated into the Chief Executive's report, along with technical assessments and recommendations.
Mr. Hanrahan emphasised the importance of effective community consultation to avoid the challenges seen in other projects, stressing the need for timely and transparent communication with local stakeholders to avoid common issues such as insufficient notice for public events. This will not only facilitate smoother progress but also foster stronger local support.

Mr. O'Sullivan acknowledged the inclusion of a visual impact assessment and recommended following the approach used in the Coolpowra project. This approach focused on a 5 km radius, with greater emphasis on areas within 2 km of sensitive receptors.

Mr. O'Sullivan sought clarification on the road referenced in Section 8.6 of the report, presuming it refers to the L3103, rather than the L3101, which is located near Cashla.

Ms. Henderson confirmed this was likely a typo.

Mr. O'Sullivan highlighted the importance of including robust mitigation measures (in Karst areas) and AA Screening - given the proximity of the site (7 km) to the Lough Corrib SAC.

Ms. Henderson confirmed that AA screening would be carried out as part of the application.

Mr. O'Sullivan stated that it is excellent to see the inclusion of an archaeological survey as part of the application. He recommended contacting the Roads Department for additional feedback related to the site.

Ms. Henderson confirmed that consultations with Transport Infrastructure Ireland (TII) are already underway and that an extensive community consultation program is planned. While a dedicated individual for public consultation has not yet been identified, she confirmed that further details could be shared with stakeholders as needed.

Mr. O'Sullivan sought clarification regarding decommissioning plans for the site.

Ms. Henderson confirmed that the Environmental Impact Assessment Report (EIAR) will include a detailed decommissioning proposal, ensuring this aspect is fully addressed in the application.

Ms. Ryan raised a point regarding the climate assessment, noting that while carbon capture may not currently be feasible due to cost, it would be beneficial to include a mention of it in the report. She suggested considering the site's design to accommodate future implementation, should it become economically viable. Additionally, she highlighted the importance of assessing the potential impact of nitrogen oxides on any nearby Special Areas of Conservation (SACs), even if they are not in close proximity, as well as clarifying the number of staff that would be present on-site once constructed.

Ms. Henderson responded that the number of staff on-site would be minimal. Once constructed, the site may have up to six people on-site for maintenance purposes, but it is more likely to be unmanned or have one or two staff members present at any given time.

Ms. Ryan also emphasised the need to address wastewater treatment in the assessment, considering the Karst geology, and to identify any necessary mitigations. She further pointed out the need to evaluate the risk of explosions, as this has been a significant public concern in previous applications.

Ms. Larkin assured that these issues would be addressed comprehensively. She stated that the COMAH assessment, as well as the major accidents and disasters section of the EIAR, would be fully detailed in the EIAR chapters to ensure all potential risks are mitigated.

Mr. Porter highlighted the low hours of operation for the Peaker plant, estimating less than 100 hours annually, which accounts for only 1% of the time. He noted that this would result in very low emissions and that the plant would fall under the EU ETS and carbon pricing mechanisms. While the initial fuel would be natural gas, projections indicate an increasing fraction of renewable gas in the network by 2028 (15%) and 2036 (30%). He explained that carbon capture would not be feasible for this type of operation, given its limited hours of use, but emphasised the plant's low-emission profile.

Ms. Henderson added that while the plant is designed to be available for up to 1500 hours annually, the actual operation hours would be much lower. She confirmed that the EIAR would adopt a worst-case scenario for the assessment to ensure a thorough analysis of any potential impacts.

Ms. Ryan acknowledged these responses and emphasised the importance of including these considerations in the final application to ensure all potential impacts are addressed effectively.

Mr. O'Sullivan revisited the topic of visuals, inquiring whether the application would include sections showing existing and proposed levels, as well as the proposed development. He emphasised the importance of incorporating visuals from different perspectives, such as views from the opposite side of the motorway through the site, to provide a clear understanding of the overall scale.

Ms. Holmes confirmed that full photomontages will be provided as part of the application. She explained that specialists will identify key viewpoints both close to and further away from the site, with "before and after" photomontages being included to illustrate the visual impacts.

Ms. Henderson assured that site sections will also be included in the application drawing pack. However, she noted that photomontages would likely be more accessible and easier to interpret for third parties.

Ms. Larkin added that six photomontage locations have already been identified, and specialists are scheduled to visit the site within the next two weeks to finalise the viewpoints and prepare the required visuals.

It was agreed that Mr. O'Sullivan would serve as the primary contact person from Galway County Council (GCC) regarding viewpoints for visual impact assessment. Additionally, it was agreed that the Roads Department would be contacted to provide feedback regarding road and traffic management issues.

Mr. Hanrahan once again emphasised the importance of conducting robust community consultations as a critical component of the project. He stressed that council members should be informed in a timely manner, with adequate notice given for public consultation events. He cited examples of past projects, where communities expressed dissatisfaction with short notice for events. He commended projects like Sceirde Rocks for their proactive and effective community engagement efforts, emphasising the visibility and accessibility of their liaison officer, who was well-known and trusted within the local community.

Ms. Henderson and Ms. Holmes thanked GCC for the open and constructive discussions, expressing their appreciation for the collaborative approach and the valuable feedback provided by all members.

Meeting Concluded.