

## **Appendix 2. Project Description**

### **2.2. Stage 1 Flood Risk Assessment**

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# Stage 1 Flood Risk Assessment

Bord Gáis Energy Ltd

August 2025

PEK3-ATR-ZZ-ZZ-RP-300003

# CASHLA PEAKER PLANT

# Notice

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## Client signoff

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# 1. Introduction

AtkinsRéalis (The Consultant) has been commissioned by Bord Gáis Energy (The Client) to provide design services for the Cashla Peaker Plant. The proposed development is a greenfield site, known as the 'proposed site' hereafter in this report. This report presents the Flood Risk Assessment (FRA) for this proposed site.

## 1.1 Relevant Guidance

This FRA has been undertaken in consideration with 'The Planning System and Flood Risk Management – Guidelines for Planning Authorities' DOEHLG November 2009, which is the latest guidance document. The guidance has been issued to ensure that flood risk is a key consideration for developers, planning & regional authorities, and the public in preparing and submitting development proposals. The principles of the guidance are as follows:

- Avoid the risk, where possible
- Substitute less vulnerable users, where avoidance is not possible, and
- Mitigate and manage the risk, where avoidance and substitution are not possible.

A staged approach is recommended within the guidance document in relation to identifying and assessing flood risk. The three stages of appraisal and assessment are as follows:

- Stage 1 Flood risk identification
- Stage 2 Initial flood risk assessment
- Stage 3 Detailed flood risk assessment

## 1.2 Flood Risk

Flood risk can be quantified by relating the probability of the flood event occurring to the consequence of the flood. Probability, in flood event terms, is gauged by potential annual occurrence/return period and flood consequence is dependent on the nature of the flood hazard and the vulnerability of the inundated area. The source-pathway-receptor model considers the components of flood risk.



The source is the hazard with the potential to cause harm through flooding (e.g., rainfall, high sea levels). The pathway is the mechanism by which the source can affect the receptor (e.g., inadequate drainage, overtopping of coastal defences) and finally, the receptor is anything which is affected by the flood event (e.g., people, infrastructure, property).

## 1.3 Causes of Flooding

The Planning System and Flood Risk Management Guidelines requires a FRA to consider all potential causes of flooding including the following:

- Coastal flooding
- Inland flooding
  - Overland flow
  - River flooding
  - Flooding from artificial drainage systems
  - Groundwater flooding
  - Estuarial flooding
  - Failure of infrastructure

## 1.4 Floodplains

A river flood plain is a low-lying area which receives excess flood water when the flow within the watercourse exceeds the capacity of the channel. A coastal flood plain is an area which, during high tide or increased sea levels, becomes inundated with sea water.

## 1.5 Assessing Flood Risk

In the context of the 'Planning System and Flood Risk Management Guidelines, DOEHLG, 2009' three flood zones are designated in the consideration of flood risk to a particular site. The three flood zones are described in Table 1-1 below.

**Table 1-1 - Flood Zones**

Flood Zone	Description
<b>Flood 'Zone A'</b>	where the probability of flooding from watercourses is the highest (greater than 1% or 1 in 100 year for watercourse flooding or 0.5% or 1 in 200 for coastal flooding).
<b>Flood 'Zone B'</b>	where the probability of flooding from watercourses is moderate (between 0.1% or 1 in 1000 year and 1% or 1 in 100 year for watercourse flooding, and between 0.1% or 1 in 1000 year and 0.5% or 1 in 200 for coastal flooding).
<b>Flood 'Zone C'</b>	where the probability of flooding from watercourses and the sea is low or negligible (less than 0.1% or 1 in 1000 year for both watercourse and coastal flooding). Flood Zone 'C' covers all areas which are not in Zones 'A' or 'B'.

The planning implications for each of the flood zones are:

Zone A - High probability of flooding. Most types of development would be considered inappropriate in this zone. Development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere, and where the Justification Test has been applied. Only water-compatible development, such as docks and marinas, dockside activities that



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require a waterside location, amenity open space, outdoor sports and recreation, would be considered appropriate in this zone.

Zone B - Moderate probability of flooding. Highly vulnerable development, such as hospitals, residential care homes, Garda, fire and ambulance stations, dwelling houses and primary strategic transport and utilities infrastructure, would generally be considered inappropriate in this zone, unless the requirements of the Justification Test can be met. Less vulnerable development, such as retail, commercial and industrial uses, sites used for short-let for caravans and camping and secondary strategic transport and utilities infrastructure, and water-compatible development might be considered appropriate in this zone. In general, however, less vulnerable development should only be considered in this zone if adequate lands or sites are not available in Zone C and subject to a flood risk assessment to the appropriate level of detail to demonstrate that flood risk to and from the development can or will adequately be managed.

Zone C - Low probability of flooding. Development in this zone is appropriate from a flood risk perspective (subject to assessment of flood hazard from sources other than rivers and the coast) but would need to meet the normal range of other proper planning and sustainable development considerations.



## 2. Planning Context

The following planning policy documents are relevant to the assessment of the proposed developments:

- The National Planning Guidelines published by the OPW and the Department of the Environment, Heritage and Local Government in November 2009 entitled ‘The Planning System and Flood Risk Management Guidelines for Planning Authorities’
- Galway County Development Plan (2022-2028)<sup>1</sup>

### 2.1 The Planning System and Flood Risk Management Guidelines

#### 2.1.1 Introduction

In November 2009, the Department of Environment, Heritage and Local Government and the Office of Public Works jointly published a Guidance Document for Planning Authorities entitled “The Planning System and Flood Risk Management”.

The Guidelines are issued under Section 28 of the Planning and Development Act 2000. Planning Authorities and An Coimisiún Pleanála are therefore required to implement these Guidelines in carrying out their functions under the Planning Acts.

The aim of the Guidelines is to ensure that flood risk is neither created nor increased by inappropriate development.

The Guidelines require the planning system to avoid development in areas at risk of flooding, unless the development can be justified on wider sustainability grounds and the risk can be reduced or managed to an acceptable level.

The Guidelines require the adoption of a Sequential Approach (to Flood Risk Management) of Avoidance, Reduction, Justification and Mitigation and they require the incorporation of Flood Risk Assessment into the process of making decisions on planning applications and planning appeals.

Fundamental to the Guidelines is the introduction of flood risk zoning and the classifications of different types of development having regard to their vulnerability.

The management of flood risk is now a key element of any development proposal in an area of potential flood risk and should therefore be addressed as early as possible in the site master planning stage.

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<sup>1</sup> [Adopted Galway County Development Plan 2022-2028 | Galway County Council Online Consultation Portal](#)

## 2.1.2 Definition of Vulnerability Classes

Table 2-1 summarises the Vulnerability Classes defined in the Guidelines and provides a sample of the most common type of development applicable to each.

**Table 2-1 - Vulnerability Classes**

Vulnerability class	Land uses and types of development which include*:
Highly vulnerable development (including essential infrastructure)	Garda, ambulance and fire stations and command centres required to be operational during flooding; Hospitals; Emergency access and egress points; Schools; Dwelling houses, student halls of residence and hostels; Residential institutions such as residential care homes, children’s homes and social services homes; Caravans and mobile home parks; Dwelling houses designed, constructed or adapted for the elderly or other people with impaired mobility; Essential infrastructure, such as primary transport and utilities distribution, including electricity generating power stations and sub-stations, water and sewage treatment plants, and significant sources of pollution (SEVESO sites, IPPC sites, etc.) in the event of flooding.
Less vulnerable development	Buildings used for: retail, leisure, warehousing, commercial, industrial and non-residential institutions; Land and buildings used for holiday or short-let caravans and camping subject to specific warning and evacuation plans; Land used for agriculture and forestry; Waste treatment (except landfill and hazardous waste); Mineral working processing; Local transport infrastructure.
Water-compatible development	Flood control infrastructure; Docks marinas and wharves Navigation facilities Ship building repairing dismantling dockside fish processing refrigeration compatible activities requiring waterside location Water-based recreation tourism (excluding sleeping accommodation) Lifeguard coastguard stations Amenity open space outdoor sports recreation essential facilities such as changing rooms Essential ancillary sleeping residential accommodation staff required by uses category subject specific warning evacuation plan



Table 2-2 illustrates the types of development that would be appropriate to each flood zone and those that would be required to meet the Justification Test.

**Table 2-2 - Matrix - Development Vulnerability and Flood Zone**

Vulnerability Class	Flood Zone A	Flood Zone B	Flood Zone C
Highly vulnerable development	Justification Test	Justification Test	Appropriate
Less vulnerable development	Justification Test	Appropriate	Appropriate
Water-compatible development	Appropriate	Appropriate	Appropriate



## 3. Project and Site Description

### 3.1 Site Location

The proposed site is located approximately 2km west of Athenry, County Galway at a site in Pollynagroagh and Rathmorrisey and it is within the corner adjacent to the M17-M18 and the M6 motorway.

The proposed site is bounded by Greenfields and the proposed cable route begins in the northeast section of the proposed site and is 8.1 km in length. The proposed route connects to the L3103, heading west underneath the M17, going Southwest underneath the M6 before travelling Northwest and concluding at Cashla Substation.



Figure 3-1 - Site Location Map for Wider Project including HV cable route

### 3.2 Project Description

The following provides a summary description of the project assessed as part of the EIAR. The overall project is subject to two separate planning applications: one for the proposed Cashla Peaker Plant and one for the electricity transmission infrastructure. The project will function as a balancing asset, operating intermittently during periods of low renewable energy generation and high electricity demand. Notwithstanding the dual consenting approach, the developments constitute a single, integrated project, whereby the peaker plant will generate electricity for supply to the national grid. The submission of separate planning applications arises solely from planning legislation requirements, which necessitate distinct applications for Strategic Infrastructure Development.

Each application will seek a 10-year permission and detail on the relevant statutory development description is set out in the planning application form.

The proposed operational life is up to and including the 31st of December 2050, which is tied to Ireland's Climate Action Plan 2025.

The project site is approximately 19.17 hectares. This is broken down into the 'Cashla Peaker Plant Site' which is approximately 11.54 hectares and is located within the townlands of Pollnagroagh and Rathmorrissy, Athenry, Co. Galway. The balance, 7.63 hectares, relates to the grid connection and substation and is 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 project comprises the following infrastructure:

- a. The construction of 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, a generator circuit breaker 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), 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), one single-storey ancillary pressure reduction kiosk (approximately 26sqm) 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 15.4m high) and one demineralised waste tank (approximately 5m high).
- b. 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: the gas analyser kiosk (approximately 6.25 sqm), the boiler house kiosk (approximately 37 sqm) including 10 no boiler flues approximately 5.67 m above ground level and emergency generator, two pressure reduction kiosks – main (approximately 73 sqm) including approximately 5.24 m high vents, and ancillary (approximately 26 sqm) including approximately 3.72 high vents – and the 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 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.

*It is noted that the connection to the existing mains gas network (Mayo–Galway pipeline (BGE/85)) will be undertaken via a new transmission pipeline (named GNI146). The GNI146 gas pipeline is subject to Section 39A Consent under the Gas Act 1976, as amended.*

- c. Ancillary works including the provision of a new gated vehicular entrance off the L3103, the construction of an access road from the proposed Cashla Peaker Plant Site entrance to the new entrance off the L3103, the demolition of one farm outbuilding (in ruin), construction of internal access roads, 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, construction of underground firewater retention tanks, provision of 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.
- d. The electricity transmission infrastructure comprises the construction of an ESB substation compound within the Cashla Peaker Plant site. The infrastructure will include a 4-bay 220 kV substation incorporating a single-storey Air-Insulated Switchgear (AIS) substation building (approximately 388sqm) and access road; a 36m high telecommunications mast; a shunt reactor, ancillary works including lighting, security fencing (2.4m high),



internal tracks, and 4 no. carparking spaces. It also consists of the construction of approximately 8.1 kilometres of an underground grid connection route and laying of cable from the proposed ESB Substation in the Cashla Peaker Plant Site to the Cashla 220kV Substation. The construction methodology includes three horizontal directional drilling (HDD) operations beneath the M6 and M17 motorways to minimise surface disruption.

The Cashla Peaker Plant involves an activity that will require an Industrial Emission Licence from the Environmental Protection Agency (EPA). This ensures that the project meets all necessary environmental standards related to emissions and other factors impacting the surrounding area. This does not apply to the electricity transmission infrastructure.

Additionally, the Cashla Peaker Plant includes the establishment of a facility where safety measures under the Major Accident Directive (Seveso) will apply. These regulations are designed to prevent and limit the consequences of potential industrial accidents, ensuring the project is both safe and compliant with industry best practices. This does not apply to the electricity transmission infrastructure.

### 3.3 Topography

According to the desktop study, the topographical levels of the proposed site are ranging from highest point 59mOD to the lowest point at 54mOD. The levels fall from the northwest point of the proposed site in a south-easterly direction.

The topographical survey for the proposed HV Cable Route shows the eastern section of the route (until it meets the M17) has levels of 56.94mOD to 46.05mOD falling in a north-westerly direction. The levels for the remainder of the HV Cable Route based on the desktop study are between 60mOD and 26.05mOD descending in a north-westerly manner.

### 3.4 Local Hydrology & Existing Drainage

The Environmental Protection Agency (EPA) Geoportal (<https://gis.epa.ie/EPAMAPS/>) was consulted in relation to the proposed scheme to identify nearby waterbodies. The closest water body to the proposed site is the River Clarin (EPA code 29C02) approximately 3.9km East of the proposed scheme and runs in a South-westerly manner as shown in Figure 3-2.





Figure 3-2 - Hydrological Features with respect to the proposed project

## 4. Flood Risk Identification for the Site

In accordance with the planning guidelines, a Stage 1 Flood risk identification is required to be undertaken to identify if there are any flooding or surface water management issues related to the proposed site that may warrant further investigation. Initially, the following possible flood mechanisms for the site have been identified:

Source/Pathway	Significant?	Comment/Reason
<b>Tidal/Coastal flooding</b>	No	The proposed site is not close to a coastal location
<b>Overland flow</b>	No	The surrounding topography is relatively shallow
<b>Fluvial/River flooding</b>	No	The surrounding area is not close to a river
<b>Flooding from artificial drainage systems</b>	No	There is no urban drainage infrastructure within the proposed site and in the immediate vicinity of the proposed site.
<b>Groundwater flooding</b>	No	There are no significant springs or groundwater discharges recorded in the immediate vicinity of the proposed site.
<b>Estuarial flooding</b>	No	The site is not at an estuarial location.
<b>Failure of infrastructure</b>	No	There are no hydraulic structures in the direct vicinity of the route.

**Table 4-1 – Possible Flooding Mechanisms**

The above Table 4-1 demonstrates that the proposed site is not at risk of flooding, however the report will continue to confirm the initial assumptions detailed above.

### 4.1 Flood Risk Investigation

#### 4.1.1 OPW Flood Maps

The Office of Public Works (OPW) interactive map viewer (<http://www.floodinfo.ie/map/floodmaps/>) displays the predicted flood extents for both rivers and coastal areas over various return periods. The viewer was consulted in relation to the proposed site.

Since there are no available flood maps, based on the map viewer, there is no flooding indicated at the proposed site.

#### 4.1.2 Historical Flood Records

The GeoHive map viewer (<http://map.geohive.ie/mapviewer.html>) was consulted to review available historic mapping for the plant site which can contain evidence of historical flooding incidences or occurrences. The maps consulted



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were the pre-1900's historic 6-inch colour and 25-inch maps. The maps did not show any evidence of historic flooding on the plant site. The 6-inch map and the 25-inch map are shown in Figure 4-1 and Figure 4-2 respectively.

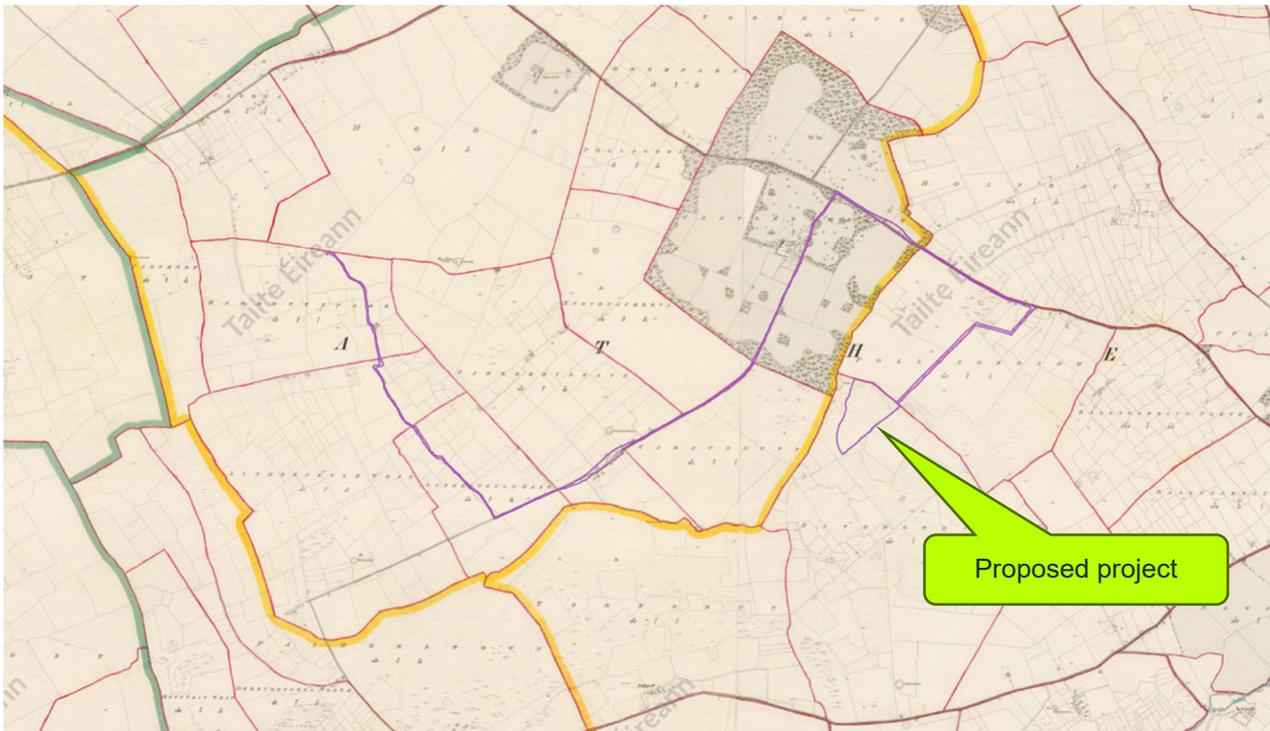


Figure 4-1 - Historic 6-Inch Colour Map

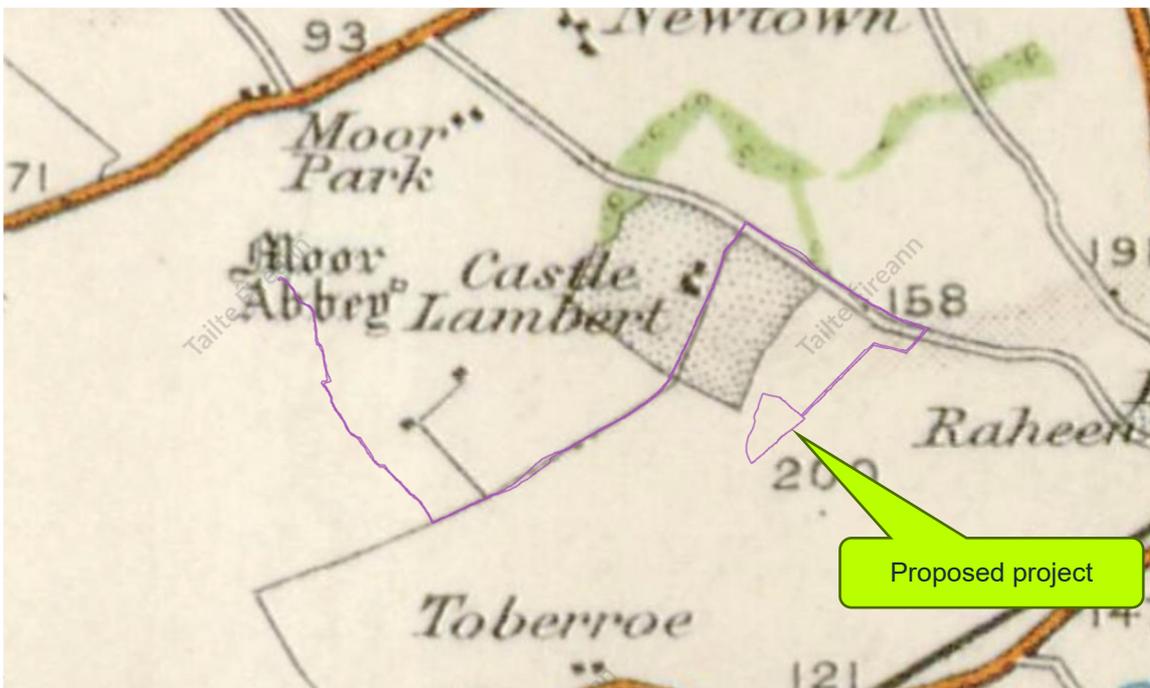


Figure 4-2 - Historic 25-Inch Map



### 4.1.3 Historic Flooding

The Office of Public Works (OPW) interactive map viewer <http://www.floodinfor.ie/map/floodmaps> was consulted to view any historic flood events located along the proposed route.

Figure 4-3 shows the flood events approximately 3.9km east from the proposed site. The single flood event at Clarin Bridge was caused due to drainage overflowing after exceptionally heavy rain, according to a meeting held by the Galway County Council on 10<sup>th</sup> May 2005. According to the meeting the flooding was caused by the River Clarin overflowing its banks every year after heavy rain.



Figure 4-3 - Historic Flood Events

### 4.1.4 Geological Survey of Ireland Mapping

The soil maps of Geological Survey of Ireland (GSI) were consulted to determine the presence of Alluvium deposits in the vicinity of the proposed site. Deposition of Alluvium can be an indicator of areas which have flooded in the recent geological past.

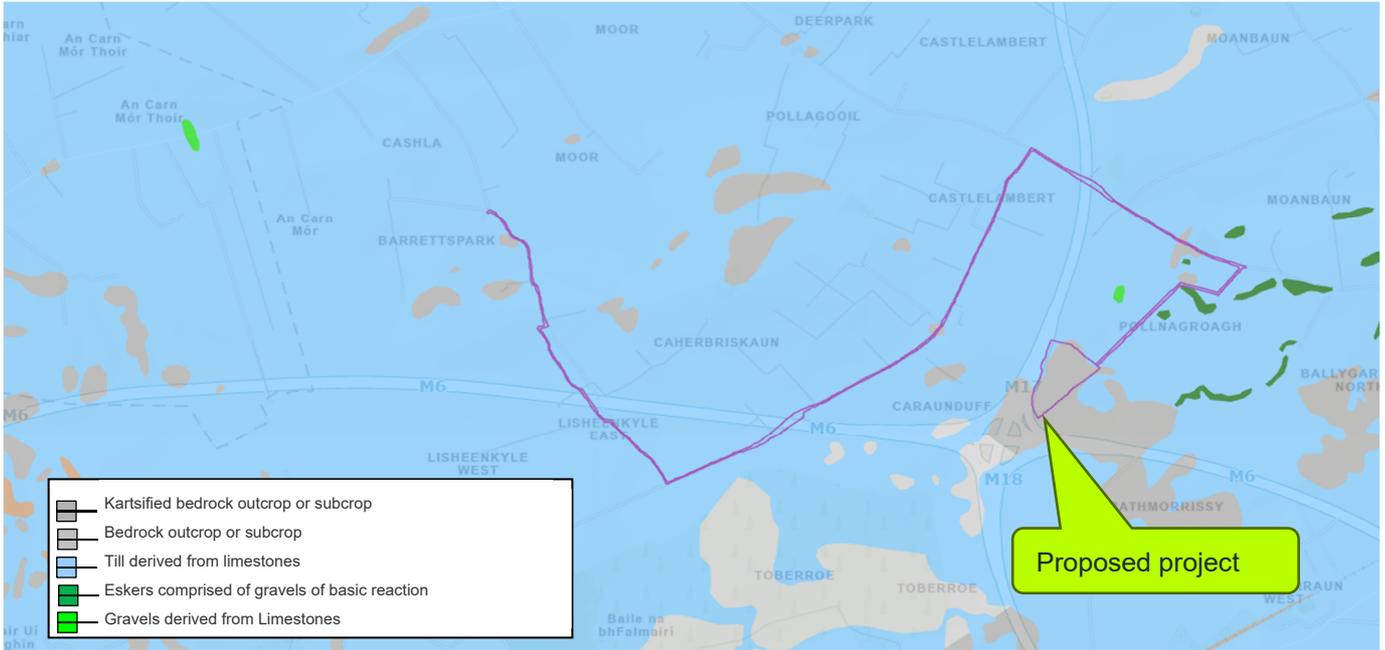


Figure 4-4 – GSI Soil Mapping

Figure 4-4 above shows the soils mapping for the proposed project which does not indicate the presence of alluvium. Other sediments identified on and around the proposed site include; Kartsified bedrock outcrop or subcrop, Bedrock outcrop or subcrop, Till derived from limestones, Eskers comprised of gravels of basic reaction and Gravels derived from Limestones.

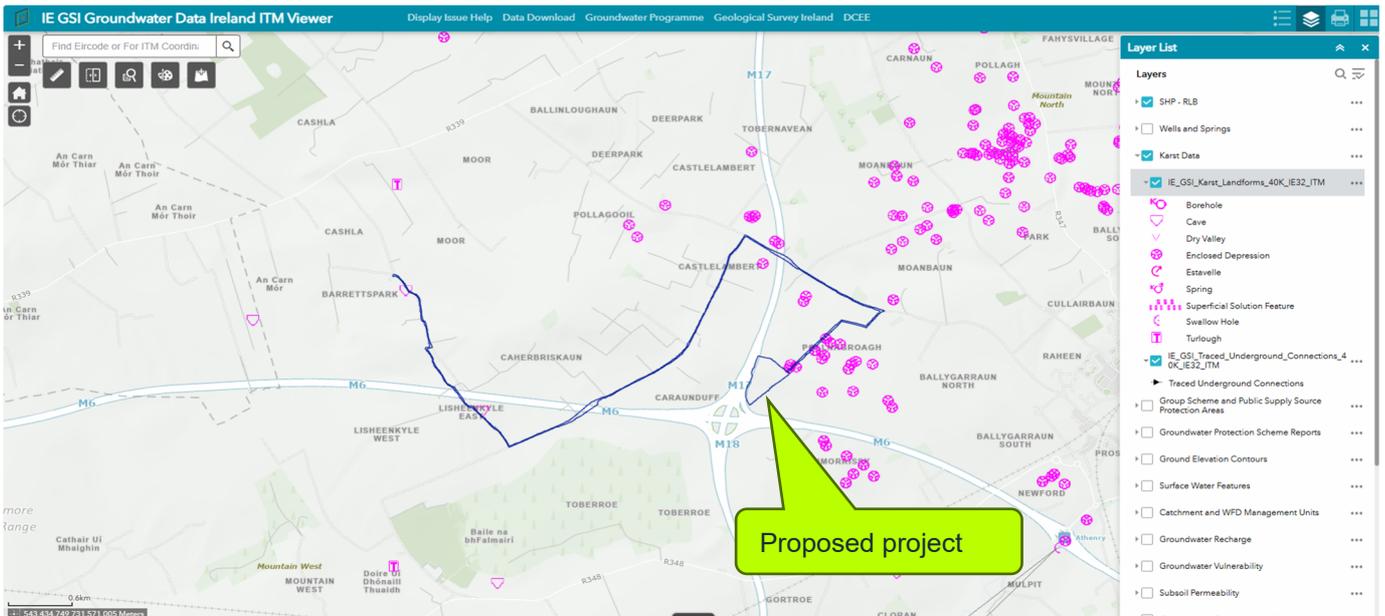


Figure 4-5 - Karst formations recorded on GSI



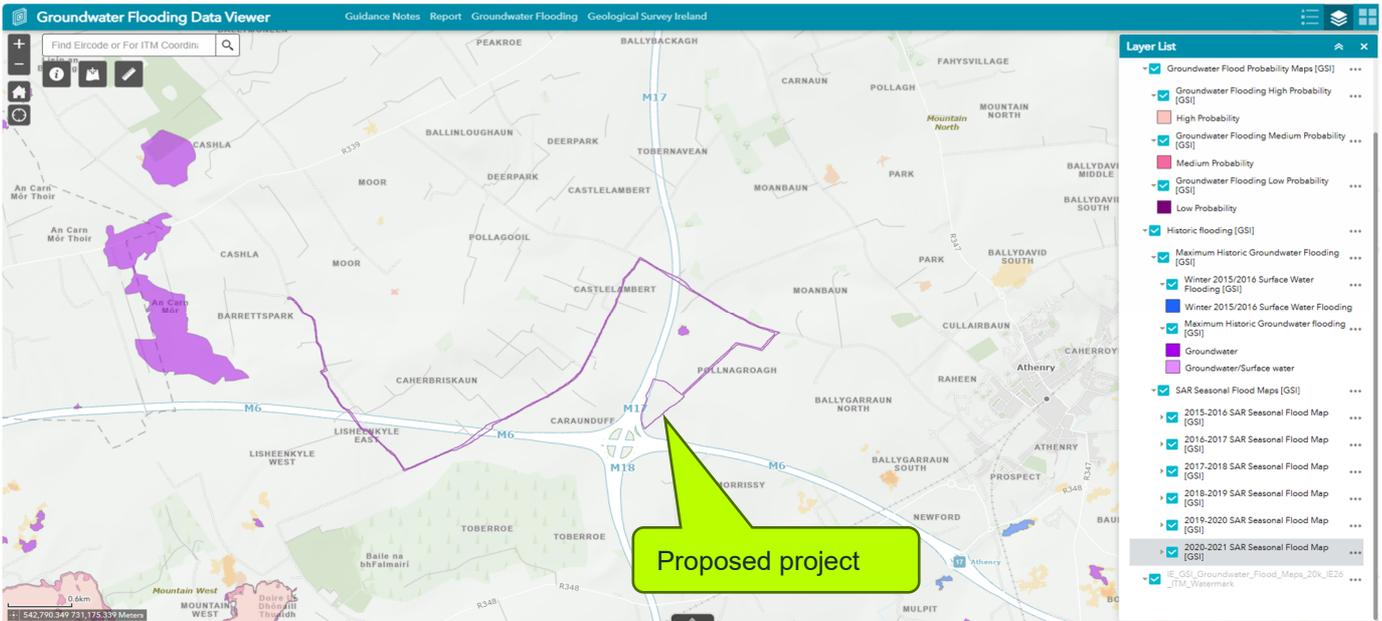


Figure 4-6 – GSI Groundwater flooding map

From checking the groundwater flood maps on Geological Survey Ireland presented in Figure 4-6 it is clear that there is no groundwater flooding in the entire project area of any find.

### 4.1.5 Galway County Council Development Plan

With reference to the Galway County Development Plan (2022-2028), the proposed site is in and around the area of Athenry and no Strategic Flood Maps are available.

The Development Plan states the following:

With regard to Athenry, the Galway Bay South East River Basin FRMP identifies:

“No structural Flood Relief Scheme is proposed at this time for Athenry. There is a relatively low level of flood risk to this community from rivers and/or the sea, and no structural flood relief measures are therefore proposed at this time. The current level of risk will be reviewed, along with all areas, on a regular basis into the future.”

## 5. Conclusion and Recommendations

### 5.1 Conclusion of Flood Risk Identification

The purpose of the Stage 1 Flood risk identification process is to establish whether a flood risk issue currently exists or may exist in the future. If a potential flood risk issue is identified the risk will be investigated in further detail by undertaking a Stage 2 – Initial flood risk assessment. However, if no potential flood risk is identified then the overall assessment can conclude at this point.

A Stage 1 flood risk assessment has been completed in accordance with *The Planning System and Flood Risk Management – Guidelines for Planning Authorities* and the following conclusions can be drawn;

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

In relation to the proposed project, based on the Stage 1 – Flood risk identification findings discussed above, the flood risk study will not need a stage 2 Initial flood risk assessment as the proposed site is not at risk of flooding.

#### 5.1.1 Recommendations

The following recommendations should be considered;

- The design for the storm-water drainage for the proposed site is to take into consideration all other standards for drainage design, from the 'Greater Dublin Strategic Drainage Study Volume 2 – New Developments.'
- Suitable Sustainable Urban Drainage systems (SUDs) are to be used within the proposed site to reduce surface water runoff from the site where feasible and designed in accordance with CIRIA report C753 'The SuDS Manual V-6'.



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