

Response to Observations

Cahermurphy West Grid
Connection Co. Clare

An Coimisiún Pleanála Ref
No: 324156-26



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EXECUTIVE SUMMARY

MKO have been instructed by Cahermurphy Renewables Designated Activity Company to prepare this Response to Observations, having been invited to respond to same by An Coimisiún Pleanála (the Commission) on the 4th of June 2026. The request was made in relation to a Strategic Infrastructure Development (SID) planning application under Section 182A of the Planning and Development Act 2000, as amended, which is currently before the Commission for consideration (Case reference: ACP-324156-26), concerning a proposed 110kV grid connection from the Proposed Cahermurphy West Wind Farm to the national grid at the existing 110kV Moneypoint Substation located in Cahermurphy and associated townlands in Co. Clare.

As set out in Section 1, this response to submissions document first comments on observations from Third Parties which have been categorised into themes, followed by commentary on observations from Statutory Bodies and finally deals with an observation made by Clare County Council.

As discussed in Section 2 of this Response to Observations, there were 43 no. submissions received on the application from Third Party Observers. Table 1 outlines the common themes identified within the Third-Party submissions and the relevant areas of expertise within the project team assigned to address each theme. Each theme is outlined and addressed in full in Section 2.

Section 3 of this Report deals directly with observations by Statutory Consultees, namely the Development Applications Unit, Geological Survey Ireland, National Environmental Health Service, Office of Public Works and Transport Infrastructure Ireland. Each Statutory Body is dealt with under a separate heading, and all relevant items are addressed in full, with appendices referenced where appropriate.

Section 4 of this report deals directly responds to observations contained in the observations submitted by the local authority in which the Proposed Project is located, Clare County Council.

As set out in the summary section in Section 5, the information contained in this Response to Observations constitutes a full and robust response to all matters raised and the information provided here will directly assist An Coimisiún Pleanála in their ongoing consideration of the planning application. The Proposed Grid Connection will facilitate a wind farm that will contribute up to 57.6MW towards the national wind energy target of 9GW by 2030 and is strongly supported by a comprehensive suite of European, national, regional, and local policy.

To combat the effects of climate change, Ireland must decarbonise its economy by 2050. There is no “silver bullet” to do so. It will take several individual renewable energy projects to decarbonise the Irish economy. The scale of the challenge we face to decarbonise the Irish economy is enormous, but the climate change implications of not doing so are even greater. There is no other way to decarbonise a modern society except through renewable energy projects such as the Proposed Project.

The Proposed Project will deliver a range of benefits including the following:

- Supporting the transition to a low-carbon and climate resilient society by reducing greenhouse gas emissions, through the generation of wind energy and displacing electricity that would otherwise be produced from fossil fuel sources.
- Providing clean, renewable, electricity to the national grid, thus contributing to the decarbonisation of the electricity sector and in the process reduce the need for imported fossil fuels for electricity, improving national energy security.
- Helping to moderate energy costs for consumers over time, both locally and nationally.
- Delivering up to 57.6MW of onshore renewable energy, making a meaningful contribution towards achieving the transition to a low-carbon economy and climate resiliency, increasing renewable energy generation, and enhancing energy security. It will contribute directly towards the CAP25 goals of 9GW of wind energy by 2030 and renewable electricity share of 80% by 2030.

- Contributing to the achievement of Clare County Council's renewable energy targets of a minimum of 550MW, as set out in the Clare County Development Plan 2023-2029, through development on lands identified as suitable for renewable energy development.
- Enabling the development of a self-sustaining, secure, reliable and efficient renewable energy supply and storage for County Clare, further advancing the Council's goal of contributing to economic development and enhanced employment opportunities in the county.
- Delivering a long-term positive impact on climate by offsetting of 37,110 tonnes of CO₂ from the largely carbon-based traditional energy mix per annum, including the 134,942 tonnes of CO₂ emissions associated with the construction and operational phase of the Proposed Project in approximately 43.6 months of operation.
- Providing a significant positive benefit to the local community through the creation of sustainable local employment, contributing annual rates to the local authority and providing a local Community Benefit Fund in line with the new Renewable Electricity Support Scheme (RESS) to provide direct funding to those areas surrounding the project.

Having regard to the key points set out in this Response to Observations, it is respectfully requested that the Commission consider the relevant international, national and regional planning context that applies to the Proposed Grid Connection, and grants permission for the application as proposed.

1. INTRODUCTION

MKO have been instructed by Cahermurphy Renewables Designated Activity Company (the Applicant), to prepare this Response to Observations, having been invited to respond to same by An Coimisiún Pleanála (the Commission) on the 4th of June 2026. The request was made in relation to a Strategic Infrastructure Development (SID) planning application under Section 182A of the Planning and Development Act 2000, as amended (the Act), which is currently before the Commission for consideration (ACP ref: 324156-26), concerning a proposed 110kV grid connection to the national grid at the existing 110kV Moneypoint Substation located in Cahermurphy and associated townlands in Co. Clare. The letter from the Commission states that the deadline for submission is the 2nd of July 2026 by 5.30pm. A subsequent extension was granted to the 9th July 2026.

At the outset, it is reiterated that the Cahermurphy West Wind Farm development is one integrated project comprising of two distinct components:

- The wind farm and its associated infrastructure, which is the subject of a separate application under Section 37E of the Act.
- The electrical grid connection works to connect the wind farm to the national grid, which is the subject of this current application under Section 182A of the Act.

For ease of reference, the following terminology is used throughout this document:

- Where the **‘Proposed Wind Farm’** is referred to, this relates to all components within the Wind Farm Application under Section 37E of the Act.
- Where the **‘Proposed Project’** is referred to, this relates to all the project components i.e. the Wind Farm Site and Grid Connection.
- Where the **‘Proposed Grid Connection’** is referred to, this relates to all components within the Grid Connection Application under Section 182A of the Act.

Both the Environmental Impact Assessment Report (EIAR) and the Natura Impact Statement (NIS) consider the combined impacts of these individual elements of the Proposed Project. However, many of the themes raised in the observations relate to the Proposed Wind Farm. In line with the Commission’s letter and to avoid duplication, this Response to Observations only addresses those issues directly relating to the Proposed Grid Connection application, except where stated otherwise. A separate response on the Proposed Wind Farm application is also being submitted to the Commission.

1.1 Response Structure

This response to submissions document comments firstly on observations from Third Parties which have been categorised into themes, followed by commentary on observations from Statutory Bodies and finally deals with observations made by the relevant local authority, Clare County Council (CCC).

This response is structured as follows:

- **Section 1** – Introduces the document and its structure,
- **Section 2** – Addresses Third-Party observations in accordance with the Commission’s request.
- **Section 3** – Addresses Statutory Consultees’ Observations in accordance with the Commission’s request.
- **Section 4** – Addresses the Local Authority Observations in accordance with the Commission’s request.
- **Section 5** – Presents a summary of the document.

2. RESPONSE TO THIRD PARTY OBSERVATIONS

2.1 Preamble

MKO wishes to reaffirm that the EIAR and Planning Application submitted to the Commission are both comprehensive and robust and are of a standard which enables the Commission to undertake an adequate assessment of the Proposed Project.

MKO can only comment on the scope, quality and adequacy of the documentation submitted as part of this application. In this regard, MKO considers that the EIAR and supporting documentation provide a strong evidence base for the Commission to undertake an assessment of the Proposed Grid Connection.

The Cahermurphy site is an extremely well-studied site and has been the subject of extensive survey work over a number of years, including six years of bird survey data, numerous ground investigations and ecological surveys, which have been collected at the site since 2018. The findings of these surveys have informed both the design and assessment of the Proposed Project present with the application documentation.

Based on the evidence collected and assessments carried out, MKO considers the site appropriate for a proposed wind energy development including the Proposed Grid Connection. MKO acknowledges that submissions made on this application express an alternative view. However, from a review of those submissions, MKO does not consider that they have identified any clear deficiencies in the survey dates, methodologies or assessments carried out which would alter the conclusions reached in the EIAR. Furthermore, it is considered that the submissions have not provided an equivalent body of technical analysis, survey data or assessment evidence that supports any alternative conclusions to those presented in the EIAR.

Notwithstanding the above, MKO acknowledges the concerns that have been raised in the submissions and every effort has been made to address these concerns throughout this Response to Observations.

2.2 Observation Themes

There were 43 no. submissions received on the application from Third Party Observers. **Table 2-1** below outlines the common themes identified within the Third-Party submissions and the relevant areas of expertise within the project team assigned to address each theme.

Table 2-1 Common themes identified within Third-Party submissions

Theme	Lead Expert for Response
Proposed Grid Connection Route	MKO Environment
Impact on Local Roads	MKO Environment
Constraints on Future Development	MKO Planning
Hydrology	MKO Environment
Biodiversity	MKO Environment
Public Consultation and Engagement	MKO Planning
Population & Human Health	MKO Environment
Cultural Heritage	MKO Environment
Landowner Consent	MKO Planning
Property Devaluation	MKO Environment

2.2.1 Proposed Grid Connection Route

An observation raises concerns regarding the consistency of the Proposed Grid Connection route, suggesting that multiple different routes are showcased throughout the EIAR.

MKO notes that a single Proposed Grid Connection is assessed throughout the EIAR. Each chapter of the EIAR assesses the impacts of the same grid connection route, with all figures across the EIAR displaying the same grid connection route, unless otherwise stated.

Where variations in the Grid Connection route are present, this relates to the assessment of reasonable alternatives, which is presented in Chapter 3 *'Consideration of Reasonable Alternatives'* of the EIAR.

For clarity, the Proposed Grid Connection route is illustrated in Figure 4-1b of the EIAR, and in Appendix 4-2 of the EIAR in greater detail.

2.2.2 Impacts on Local Roads

Multiple submissions raise concern over the potential for the construction of the Proposed Grid Connection to cause damage to the local road network.

Firstly, it should be noted that the road network will be fully reinstated as per Road Authority specifications post construction. Any works within the public road will be carried out under a Road Opening Licence issued by the Local Authority. This licence will specify requirements relating to reinstatement standards and will also provide for long-term impact and reinstatement fees, that are held for a minimum of two years following the completion of works, to cover any road maintenance works that may be required.

In addition to the above, where required by the Local Authorities, a pre-condition survey of roads associated with the Proposed Project will be carried out immediately prior to construction commencement to record an accurate condition of the road at the time. A post construction survey will be carried out after works are completed to ensure that any remediation works are carried out to a satisfactory standard. The timing of these surveys will be agreed with the local authority. All road surfaces and boundaries will be re-instated to pre-development condition, as agreed with the Local Authority Engineers.

As the grid connection works will be temporary and localised in nature and coupled with the statutory controls that will be applied as part of the Road Opening Licence process, no significant long-term damage to the local road network is anticipated. It should be noted that many of the local roads in which the Proposed Grid Connection will be located will have the road surfaces improved as a result of the Proposed Grid Connection once construction is finished when compared to the poor condition the roads are currently in at some locations.

2.2.3 Constraints on Future Development

A number of observations raise concerns regarding the potential for the Proposed Grid Connection to impact and constrain future development.

It is considered that the Proposed Grid Connection will not result in any significant constraints on future development within the surrounding area. The proposed infrastructure is linear in nature and occupies a limited physical footprint. Its design and routing have been developed to minimise interaction with existing properties, infrastructure, and planned development areas. The proposal will not sterilise land or preclude future development, and any wayleave or easement requirements associated with the development are limited to those necessary to ensure the safe operation and maintenance of the infrastructure.

Furthermore, the Proposed Grid Connection has been assessed having regard to the relevant planning policy framework and existing land use patterns. It is considered that the Proposed Grid Connection can coexist with other compatible forms of development and will not adversely affect the ability of lands within the area to accommodate future development in accordance with the objectives of the Clare County Development Plan 2023-2029 (CCDP).

2.2.4 Hydrology

A number of observations raise concerns regarding the potential for the Proposed Grid Connection to impact on private wells, as well as groundwater and surface water features. Furthermore, concern is raised in relation to proposed river crossings and Horizontal Direct Drilling (HDD) beneath watercourses along the route. A response to each of the above concerns has been provided in the following subsections.

2.2.4.1 Groundwater & Private Wells

The potential for impacts on private domestic wells and groundwater levels is discussed in Sections 9.3.11.2, 9.5.2.3, 9.5.2.6 and 9.5.2.10 of the EIAR. As outlined therein, no specific assessment of wells along the Proposed Grid Connection route was carried out, as no potential for significant effects were identified. This is due to the nature of the works, which consist of a shallow underground cable installed primarily within the existing public road network outside the Proposed Wind Farm. The cable trench will typically be approximately 825 mm wide and 1,315 mm deep and will be largely confined to the road corridor, with limited variations at bridge crossings and HDD locations. The Proposed Grid Connection departs from the public roadway at four locations, all of which were considered to not have any potential for effect on groundwater wells, given the absence of flow paths to any groundwater resource.

2.2.4.2 Surface Water (including rivers)

Concerns are also raised regarding the potential for the Proposed Grid Connection to impact surface water bodies, such as rivers and streams along the Proposed Grid Connection route. This is comprehensively addressed in Section 9.5.2.14 of the EIAR. To reiterate, the majority of the Proposed Grid Connection underground cabling route is located within the public road network and no in-stream works are proposed along said route. Any HDD that is required will occur at a large distance from the watercourses, with drilling and laying of the 110kV grid connection cabling occurring well below the watercourse bed. As such, no significant effects are anticipated on surface water features as a result of the Proposed Grid Connection works.

2.2.5 Biodiversity

An observation raises concerns about the Proposed Grid Connections impacts on hedgerows and the species they support. MKO wish to clarify that no felling, nor pruning of any hedgerow is required to facilitate the Proposed Grid Connection. As such, the Proposed Grid Connection will not impact hedgerow, nor any associated species in any manner outside of temporary disturbance during the construction of the Proposed Grid Connection, which will not be a significant impact.

An observation raised a concern regarding the adequacy of the Appropriate Assessment and Natura Impact Statement (NIS) undertaken, stating that it is not legally robust. This observation states that the AASR/NIS relies on mitigation measures that are not yet defined, surveys that will be carried out in the future, and management measures that will be refined later.

MKO considers that the findings of the Appropriate Assessment and the conclusions therein are both legally and scientifically robust. No specific deficiencies or evidence in relation to the assessment carried out have been identified within the observation that would alter the findings of the AASR or NIS. Mitigation measures are defined throughout the AASR/NIS in sufficient detail to reach the conclusions of the report, and pre/post construction surveys are considered to be best practice to inform construction

on the Site should ecological conditions change between the application and construction. These are not weaknesses but rather methods to reduce and mitigate and potential for environmental impacts prior to, as well as during construction

2.2.6

Public Consultation and Engagement

Concerns have been raised about the lack of community consultation with local residents in relation to the Proposed Project. A concern was also raised about the grid connection not being discussed as a part of the community consultation.

It is important to note that information on the proposed grid connection has been provided throughout the project's community engagement programme. A Community Consultation Report detailed the full and comprehensive community consultation effort that was undertaken for the overall Proposed Project and is included as Appendix 2-4 of the EIAR. As outlined in that document, the key elements of the Applicant's community engagement model is as follows:

- Appointment of two dedicated Community Liaison Officers (CLOs)
- Community outreach through online platforms and local print media advertisements,
- A commitment to open, transparent dialogue and communications,
- Creating opportunities for discussion on key issues via door-to-door visits by CLO's.
- Ensuring that the local community has access to all relevant information, as soon as it is available, in a user-friendly format.

Throughout the lengthy consultation period the CLO's have continued to liaise with any interested parties and answer any questions as promptly as possible.

Also, on the 27th of June 2024, a public information event was held in Kilmihil village. This was to further introduce the Proposed Project and brief the local residents on ways to get involved and provide feedback. This event also provided an opportunity for residents to ask any questions they had about the Proposed Project. A further public event was held in Kilmihil village on the 27th of August 2025 in which the Proposed Grid Connection route was available to view in full. This event was held to inform the local residents of the expected final wind farm design along with the proposed grid connection route, showcase photomontage booklets, as well as the community benefits that the Proposed Project would provide. A brochure was similarly distributed prior to this event detailing the Proposed Project in full, including the Proposed Grid Connection route, and was available to view on the project website.

In conclusion, active engagement and consultation with the local community has taken place from an early stage during the pre-application phase of the Proposed Grid Connection (and Proposed Wind Farm). The consultation process has been an extremely valuable exercise and has provided a detailed, and enhanced understanding of the key issues and concerns of the local community, which have ultimately shaped the final project proposal. The CLOs remain active and are available to the community for discussion on any matter relating to the project.

Please refer to the Community Consultation report at Appendix 2-4 of the EIAR for further details.

2.2.7

Population and Human Health

Multiple observations raise concern regarding the potential health impacts on residents living in proximity of the Proposed Grid Connection route, with particular concern being raised in regard to Electromagnetic Fields (EMF).

The study of electricity transmission infrastructure and potential health effects is an ongoing and complex area of research. A part of this body of evidence is a literature review entitled "*Literature review of electromagnetic fields (EMF) and human health, and an evidence base of EMF measurements from the Irish Transmission System*", which was commissioned by EirGrid and prepared by RPS Group in July

2014. This study sought to both review existing literature, as well as measure existing EMF generated by a range of high-voltage electricity transmission infrastructure in Ireland.

To briefly summarise, the literature review found that whilst there is no substantive link between Extremely Low Frequency (ELF) and EMF and some health effects such as Alzheimer's, cardiovascular disease and effects on the immune system, there remains some limited evidence that there is a casual link between EMF/ELF exposure and childhood leukaemia. Investigation into this link has been continuous for decades, with research consistently being inconclusive, so whilst a causal correlation is noted, the exact mechanism behind this is not yet fully understood with many studies finding no direct correlation between ELF/EMF and human health effects. It is considered appropriate by health protection bodies to remain within set guidelines to manage health risks and reduce unnecessary exposure where possible.

Furthermore, as stated in Section 5.8.4 of the EIAR, the ESB document 'EMF & You' (ESB, 2017)¹ provides further practical information on EMF. To summarise, ESB iterate that established national and international scientific agencies have consistently concluded that their research does not indicate that EMF causes any adverse health effects (on human health or animals) at levels encountered in our everyday environment.

Given the Proposed Grid Connection route is located within cable sheath and located entirely underground, direct exposure to the public is limited. According to the aforementioned EirGrid study, the maximum magnetic field strength measured at all overhead lines, underground cables and substation perimeters surveyed was well below the ICNIRP public exposure reference level, set to protect public health. Furthermore, the study found that *"There is no electric field above ground level for underground cables, as the field is fully screened by the cable sheath"*.

As such, having regard to the nature of the Proposed Grid Connection and the available scientific data, no significant health effects in relation to EMF on any residents along the Proposed Grid Connection route are anticipated.

2.2.8 Cultural Heritage

Observations have raised concerns regarding the proximity of the Proposed Grid Connection route to multiple recorded monuments and protected heritage structures.

The Proposed Grid Connection is predominately located within the public road corridor, which significantly minimises any potential risk of any impact on cultural heritage assets. Where the grid connection cabling route is required to be off-road, no significant impacts on cultural heritage features are anticipated. Furthermore, all excavation works will be subject to pre-construction archaeological monitoring, with any unrecorded archaeological features either being preserved by record or in-situ.

An observation makes specific reference to a ringfort located 5m east of the grid connection at its closest point. This is in reference to a Recorded Monument (CL067-059) in the townland of Doonnagurroge. MKO wish to clarify that the Proposed Grid Connection 110kV cabling route will remain within the public road corridor at this location, and as such will not impact the ringfort in any manner. No felling works or vegetation trimming are needed at this location, therefore no direct impacts on the ringfort are anticipated.

¹ *EMF & You: Information about Electric & Magnetic Fields and the electricity network in Ireland* Available at: https://esb.ie/docs/default-source/default-document-library/emf-public-information_booklet_v9.pdf?sfvrsn=0.

3.

RESPONSE TO STATUTORY CONSULTTEES' OBSERVATIONS

A total of 5 submissions were submitted to the Commission from Statutory Consultees in relation to the Proposed Grid Connection. **Table 3-1** below identifies the Statutory Consultees who lodged a submission to the Commission in relation to the grid connection application and who in the project team is responsible for the corresponding response. The submission from Clare County Council is covered in **Section 4** of this document.

Table 3-1: List of Statutory Consultees and Lead Author for Response

Statutory Consultee	Themes Included	Lead Author for Response
The Department of Housing, Local Government and Heritage	Archaeology	MKO Environment
Geological Survey Ireland	Geology/Hydrogeology	MKO Environment
Health Service Executive	Health Impacts	MKO Environment
Office of Public Works	Aviation	MKO Environment
Transport Infrastructure Ireland	Traffic & Transport	Alan Lipscombe Traffic and Transport Consultants – Traffic Consultants, MKO Environment

3.1

The Department of Housing, Local Government and Heritage (Development Applications Unit)

The Department of Housing, Local Government and Heritage (DoHLGH) raised 4 no. requirements in relation to Archaeology, which are discussed individually below:

1. Requirement 1:

“All mitigation measures in relation to archaeology and cultural heritage as set out in Chapter 13 of the EIAR (IAC Ltd; dated 20 February 2026) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.”

Response:

The Applicant confirms that all mitigation measures as set out in Chapter 13 of the EIAR shall be implemented in full, except as may otherwise be required in order to comply with the conditions of any grant of permission.

2. Requirement 2:

“The developer shall engage a suitably qualified archaeologist (licensed under the National Monuments Acts) to carry out pre-development archaeological testing in areas of proposed ground disturbance and to submit an archaeological impact assessment report for the written agreement of the planning authority, following consultation with the National Monuments Service of the Department, in advance of any site preparation works or groundworks, including site investigation works/topsoil stripping/site clearance and/or construction works,

- a. *The report shall include an archaeological impact statement and mitigation strategy. Where archaeological material is shown to be present, avoidance, preservation in situ, preservation by record (archaeological excavation) and/or monitoring may be required*

- b. *Any further archaeological mitigation requirements specified by the planning authority, following consultation with the National Monuments Service of the Department, shall be complied with by the developer.*
- c. *No site preparation and/or construction works shall be carried out on site until the archaeologist's report has been submitted to and approval to proceed is agreed in writing with the planning authority"*

Response:

As detailed in Section 13.5.2.1 of Chapter 13 pre-development archaeological testing areas of the Proposed Grid Connection within existing greenfield, as well as where it runs through bridges CH59 and CH60 (as identified in table 13-9 of the EIAR) will be carried out under licence from the National Monuments Service (NMS). A report on the testing will be compiled on completion of the work and submitted to the NMS and the Planning Authority. The report will include an archaeological impact statement and mitigation strategy. Further mitigation including preservation in situ (avoidance), preservation by record (excavation) and/or buffer zones may be required depending on the results of the testing.

3. Requirement 3:

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

Response:

As detailed in Chapter 13 of the EIAR all mitigation measures set out therein pertaining to archaeological or cultural heritage constraints will be included in the Construction Environment Management Plan (CEMP). The CEMP will include the location of all archaeological and cultural heritage constraints, will identify any potential direct or indirect impacts to same and will detail all mitigation measures to be implemented to ensure the protection of the archaeological and cultural heritage assets during all phases of site preparation and construction activity. The CEMP will be updated with the locations of any unrecorded monuments which may be discovered during the pre-development archaeological testing.

4. Requirement 4:

"The planning authority and the National Monuments Service of the Department shall be furnished with a final archaeological report describing the results of all archaeological monitoring and any archaeological investigative work/excavation required, following the completion of all archaeological work on site and any necessary post-excavation specialist analysis. All resulting and associated archaeological costs shall be borne by the developer."

Response:

A final report detailing the results of archaeological monitoring of ground works and any archaeological investigations such as archaeological testing and excavation undertaken as part of the Proposed Grid Connection will be compiled on completion of the site work. The report will be illustrated with relevant drawings, photographs and plans and will also contain any necessary specialist reports. The final report will be submitted to the NMS and the relevant planning authority, Clare County Council, in the event that planning permission is granted.

3.2 Geological Survey Ireland

Geological Survey Ireland (GSI) did not raise any concerns in relation to the Proposed Grid Connection in their submission. GSI acknowledged the use of its hydrogeological and geological datasets in preparation of the EIAR.

No issues in relation to lands, soil or hydrogeology were identified.

3.3 The National Environmental Health Service (NEHS) National Environmental Health Service (NEHS)

The National Environmental Health Service (NEHS) raised a number of items in their submission for consideration. For the purposes of this response document, key points have been extracted from the report and are responded to below:

Issue 1: Noise & Vibrations

“The NEHS recommends that, if permission is granted, the following measures are secured

a) Implementation of a construction noise management and curtailment strategy.

b) Construction hours restricted to

- • Monday–Friday: 07:00–19:00
- • Saturday: 08:00–13:00
- • Sundays/Public Holidays: No noisy works permitted

c) Noise and vibration monitoring at sensitive receptor locations.

d) Restrictions on working hours near schools and community facilities where feasible

e) Consideration of cumulative noise impacts, including nearby quarry operations

f) Maintenance of safe access to residential and community receptors

g) Implementation of a complaints management procedure.”

Responses

- a) Construction noise along the grid connection route is anticipated to be within the construction noise criterion of 70 dB LAeq,12hr set out in Section 12.3.2.1.1 of the EIAR. The Applicant will endeavour to ensure that construction noise will be managed to appropriate levels, however, a curtailment strategy should not be necessary given the effects will be Brief at sensitive receptors along the Proposed Grid Connection.
- b) The Applicant agrees to the above construction hours, however, to ensure that optimal use is made of good weather periods or at critical periods within the programme, it could occasionally be necessary to work out of these hours. Any out of hours works will be coordinated with the local authority and communicated to local residents in advance of any works.

- c) Given the noise and vibration effects at sensitive receptors along the Proposed Grid Connection route will be Brief to Temporary in duration, the monitoring of noise and vibrations at specific receptors should not be necessary. Whilst significant noise exceedances are not anticipated along the Proposed Grid Connection, and working hours will be limited to daytime hours as outlined in Section 3.3 of this document, if a complaint is made regarding noise, the Applicant will endeavour to reduce noise levels to reduce any impact on local receptors through a noise complaint procedure on a case-by-case basis.
- d) The Applicant is agreeable to this condition, where feasible.
- e) The appointed contractor will endeavour to communicate with other contractors responsible for operations in the wider area which may have potential to give rise to cumulative impacts and ensure that noise and vibration levels are kept within the construction noise criterion of 70 dB LAeq,12hr.
- f) The Applicant will ensure that safe access to residential and community receptors is provided to residents in the area.
- g) A Noise Complaint Management Protocol has been included as Appendix 12-9 of the EIAR. The Applicant endeavours to ensure that any noise complaints will be promptly resolved.

Issue 2: Dust

“The NEHS recommends a receptor-focused dust management plan be implemented, including monitoring and mitigation measures at schools, residential clusters and sensitive community facilities along the grid connection route”

Response

A range of mitigation and monitoring measures to manage dust emissions during the construction phase of the Proposed Project (both the Proposed Wind Farm and Proposed Grid Connection) are outlined in Sections 10.4.2.3 and 10.4.2.4 of Chapter 10 ‘Air Quality’ of the EIAR. These include but are not limited to:

- Sporadic wetting of loose stone surface
- All plant and materials vehicles will be stored in dedicated areas within the Site
- Turbines and construction traffic will be transported to the Site on specified haul routes only.
- The agreed haul route road adjacent to the Site will be regularly inspected for cleanliness and cleaned as necessary.
- The transportation of materials from the borrow pit around the Site will be covered by tarpaulin or similar covered vehicles where necessary.

The Applicant can produce a designated dust management plan for the Proposed Grid Connection should the need for such a plan be conditioned.

Issue 3: Land Soils & Geology / Water / CEMP

“If consent is given for this development then the mitigation measures outlined in the Construction Environmental Management Plan (CEMP) should be fully implemented and secured by condition of consent.

The EIAR identifies potential indirect interactions with water receptors including local rivers, private wells, and regional water supplies.

While no direct human health impacts are anticipated, there is potential for indirect effects during construction through sediment runoff, spills, or disturbance of drainage pathways

The NEHS recommends strict adherence to the CEMP, with particular emphasis on:

- *surface water protection,*
- *spill prevention,*
- *and management of excavated material.”*

Response:

The Applicant is agreeable to the above and would accept the imposition of an appropriate planning condition in this regard.

Issue 4: Food Safety Compliance

“The development itself will bring level of employment in the construction phase. Should welfare facilities in any of the temporary construction compounds become a commercial kitchen/canteen or food preparation area, then it operates as a food business. The NEHS require that registration be undertaken in accordance with Article 6(2) of Regulation (EC) No. 852/2004, and that early engagement with the appropriate registering authority be undertaken to ensure compliance with food hygiene legislation.

Where smoking shelter(s) are provided if any within temporary construction compounds, they shall comply with Section 47 of the Public Health (Tobacco) Act 2004 (as amended). The unit recommends that early engagement with the appropriate registering authority is undertaken to ensure compliance with Tobacco legislation.”

Response

The Applicant is agreeable to the above conditions and will ensure compliance with all with food safety and tobacco legislation, where applicable.

Issue 5: Pest Control Plan

“A pest control plan should be implemented throughout the construction phase to protect workers and sensitive receptors, including nearby residences, schools and food premises, Construction activities should ensure that drains and sewers are not damaged or left open, in order to prevent rodent access and infestation”

Response

The applicant is agreeable to the above condition.

3.4

Office of Public Works (OPW)

The Office of Public Works (OPW) submitted an observation which raised two key issues relating to benefitting lands and bridge crossings along the Proposed Grid Connection, which have been discussed below.

3.4.1

Benefitting Lands

The OPW noted that a portion of the Proposed Grid Connection is located within benefitting lands and must be considered as part of the development proposals.

MKO wish to clarify that the benefitting lands have been considered as part of the development proposals. It should be noted that no excavation works are proposed within the benefitting lands highlighted in the OPWs observation. Instead, the underground 110kV grid connection cabling will be horizontally directionally drilled underneath the Creegh River, and the benefitting lands at this location. Figure 1 below showcases the location of the receptor pits (pink hatched polygon) and grid connection 110kV cabling (purple polyline) in relation to the benefitting lands (blue spotted polygon). The area of 110kV cabling between both receptor pits will be installed entirely underground.

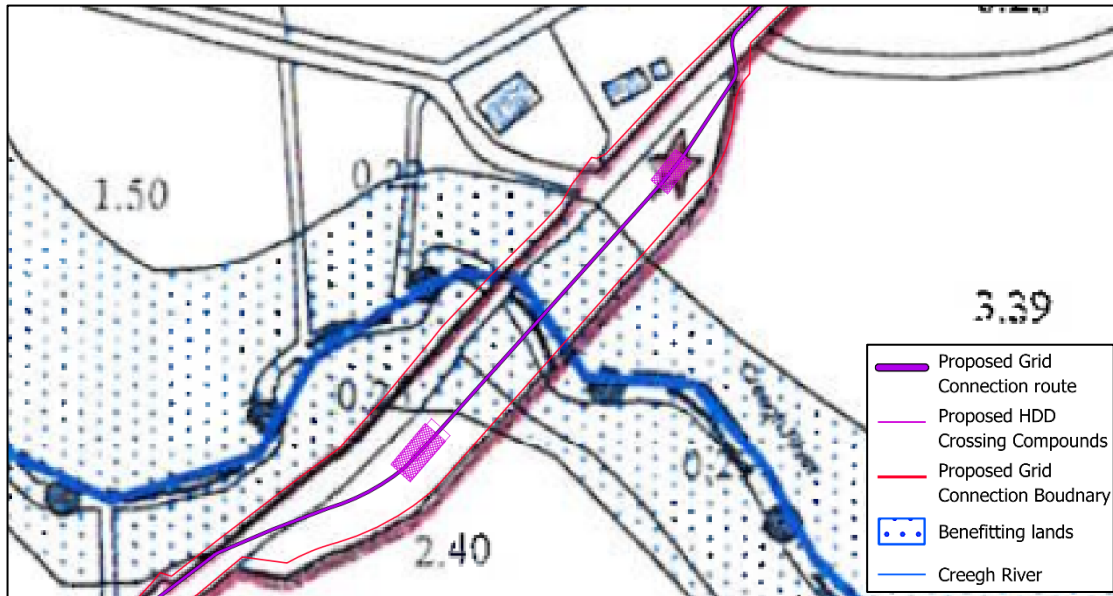


Figure 1: Receptor pits in relation to benefitting lands

The purpose of benefitting lands is to be drained or otherwise improve the execution of drainage works. The HDD underneath the Creegh River will not influence the drainage function, or future drainage function of the benefitting lands. Accordingly, it can be determined that no effects on the benefitting lands nor its drainage function are predicted.

3.4.2 Bridge Crossings

The OPW highlight that if the Proposed Grid Connection were to pass the cable in its ducting through the opening of a bridge or culvert that it would be considered a modification of a bridge and would require Section 50 consent to be obtained. MKO wish to clarify that the Proposed Grid Connection will not lead to any modifications of bridges as defined above, and instead, all cable ducting will either be buried within the road network as it crosses the bridge or drilled underneath the structure using HDD methodology. As such, a Section 50 consent is not applicable to the Proposed Grid Connection.

3.5 Transport Infrastructure Ireland

Transport Infrastructure Ireland (TII) raised concerns regarding the underground cabling route and its potential impacts on the road infrastructure, services and future maintenance and improvement requirements. TII have proposed a condition and multiple principles to said condition, which have been discussed below:

Proposed Condition

“Crossings of the N67 and N68 national road network shall be by HDD only. All standards for grid connection cable construction and associated infrastructure in the public road shall be agreed with the Road Authority prior to the commencement of any development.”

Reason; in the interests of clarity as to the construction of this permission, to ensure adherence to Department of Transport Circulars RW 07 of 2025 and RW 05 of 2026, to safeguard the strategic function and maintain levels of safety on the national road network in accordance with National Strategic Outcome no. 2 of the National Planning Framework, RPO 140 of the Southern Regional Assembly Regional Spatial and Economic Strategy and Development Plan Objective CDP 11.11 of the Clare County Development Plan, 2023 - 2029’.”

Response

MKO wish to clarify that the crossing of the N68 national road is currently proposed to be via HDD, as the N68 crossing contains a number of existing Uisce Éireann potable water pipes and HDD would therefore minimise disruption to traffic. This method was not considered necessary for the crossing of the N67, as there are no existing Uisce Éireann within the confines of the N67 carriageway at this crossing. It is important to note that the crossing of the National Road Network via HDD is not considered to be standard practice for the crossing of roads and instead a method of crossing watercourses to limit the potential for impacts on water quality, aquatic receptors and material assets (such as bridges and underground services).

The construction methodology of providing an underground grid connection cabling route under and along the national road networks is well established and accepted nationwide. There are in excess of 300 wind farms currently operational in Ireland and the majority of these are connected to the national grid via underground cable connections predominantly along the public road networks.

Once the Proposed Grid Connection underground cabling works have been completed, it will become an ESNB asset and be treated no differently to any other existing service or utility within the public road corridor and will not in any way hinder the ability to safeguard the strategic function and maintain levels of safety on the national road network. There is sufficient space within the road corridor to support any existing utilities alongside the Proposed Grid Connection underground cabling.

In the case of the N67, the crossing is limited to a 10m section of road within an overall grid connection route of 25km. Therefore, having regard to the nature and scale of the crossing, HDD is not considered necessary at this location.

Principles to the above condition

TII Principle 1

“Any cable routing should avoid all impacts to existing TII infrastructure such as traffic counters, weather stations, embankments, drainage, structures, etc. and works required to such infrastructure shall only be undertaken in consultation with and subject to the agreement of TII, any costs attributable shall be borne by the applicant/developer. The developer should also be aware that separate approvals may be required for works traversing the national road network”

Response

The Applicant acknowledges the above and confirms its willingness to comply with these requirements.

TII Principle 2

“The Commission will also note that Section 5.5 of TII Publications DN-STR-03012 (Design for Durability) requires that electricity cables 10kV or greater shall not be located on or over road structures, including buried structures. Where electricity cables 10kV or greater are required to cross a road structure they shall pass below the structure, at a sufficient depth so as to remove the potential for any impacts on the structure during operation”

Response

It is proposed that the Proposed Grid Connection will pass below all road structures with a minimum depth of cover to the top of the communications duct of 950mm, which is compliant with the Department of Transport Circulars RW 07 of 2025 and RW 05 of 2026.

4. RESPONSE TO LOCAL AUTHORITY OBSERVATIONS

A submission was received on the application from Clare County Council (CCC) in accordance with the requirements of Section 182 (A) of the Act. Although CCC have not recommended outright refusal of the application, they have raised a number of concerns in relation to the Proposed Grid Connection, and their Observations can be grouped into the following items:

- Carrying capacity and safety of road network,
- Contributions.

4.1 Carrying capacity and safety of Road Network

Impact on road network

CCC have highlighted concerns in respect of the impact of the Proposed Grid Connection on the public road network, and in particular the local roads serving the site which will be mostly affected by the Proposed Grid Connection. CCC highlight concerns that the roads are in poor condition with regards to capacity and also that the Proposed Grid Connection will give rise to impacts on the structure of the road.

As discussed in Chapter 15 of the EIAR, all road surfaces will be fully reinstated as per Road Authority specifications. Furthermore, the Road Opening Licence process includes for long-term impact and reinstatement fees, that are held for a minimum of two years following the completion of works, to cover any road maintenance works that may be required.

CCC similarly highlight concerns regarding the impact of road diversions on the capacity of the wider road network, as well as any cumulative impact with the windfarm Turbine Delivery Route (TDR) works. As stated in Section 15.1.13.2 of the EIAR, traffic volumes along the Proposed Grid Connection route are relatively low and as such any impacts will be Short-term and Slight. Furthermore, any road closures will be temporary in nature, with the maximum length of closure being 51 days at grid section 5 (see Table 15-29 of the EIAR for breakdown of grid sections). Regarding cumulative effects alongside TDR works, the TDR works will not require any road closures and regardless, there is only a small degree of overlap between the diversion area associated with grid section 4 (as identified in Table 15-29 of the EIAR) and the proposed TDR works. Furthermore, grid section 4 will only see road closures for a predicted 33 days.

To reduce any potential for cumulative impacts, The Applicant will coordinate the timing of the works associated with section 4 of the Proposed Grid Connection route, and any TDR accommodation works, insofar as practicable, to avoid overlap and minimise cumulative traffic and road network impacts. It should also be noted that the quantity of vehicles required for the construction of the TDR accommodation areas will be minor and will not have any bearing on the ability for the L-2080/L-2082 to function within capacity, given the works are primarily confined to private lands adjacent to the road network.

Further to the above, CCC recommend the below conditions be incorporated in the event of a grant of permission:

Road Opening Licenses

CCC have stated the following regarding the requirement for a Road Opening Licence:

- *Road Opening licences will be required for the overall Grid Connection and any other works proposed along the public road.*
- *Road Opening License fees will automatically be calculated by Map Road Licensing*
- *A Bond to cover any reinstatement works shall be required*
- *A Clerk of works will be required to supervise the works from Clare County Council, the applicant shall bear these costs*
- *The applicant is to provide a community relations officer.*

Response

The Applicant acknowledges the above conditions and would accept their inclusion as part of any grant of permission. It should also be noted that two CLO's have already been appointed in the local area.

Road Reinstatement

CCC have stated the following regarding road reinstatement requirements:

- *All Junctions with Opening and Changes in Direction of routes at Junctions with require Full Junction reinstatement in compliance with Standard Drawing SD4 of the Guidelines for Managing Opening in Public Roads, Second Edition (Rev 1) April 2017*
- *Launch And received pits from Directional drilling will require reinstatement in compliance with Standard Drawing SD4 of the Guidelines for Managing Opening in Public Roads, Second Edition (Rev 1) April 2017*
- *Any cabling laid on Local roads shall receive Double Surface dressing on 100mm paved Cl.806 full road reinstatement. Surface dressing to be carried out by an approved contractor, works to be completed within the surface dressing season in compliance with Standard Drawing SD5 of the Guidelines for Managing Opening in Public Roads, Second Edition (Rev 1) April 2017 and in compliance with the IAT Guidelines for Surface Dressing.*
- *Any cabling shall also comply with the Department Guidance "Interim Guidance to Road Authorities regarding the proposed placement of Medium or High Voltage electricity assets, including ducts, cables, and associated infrastructure under public roads", 2026*

Response

The Applicant acknowledges the above conditions and would accept their inclusion as part of any grant of permission.

Road Closures

CCC have stated the following regarding road closures;

- *Road closures are to be advertised in advance of works with key dates provided taking account of diversion routes*
- *Road closures and diversion routes are to be agreed with the Kilrush Municipal District Office*

Response

The Applicant acknowledges the above conditions and would accept their inclusion as part of any grant of permission.

Bridges/Culverts/Pipelines

- *Pre-condition survey to be carried out on all Bridges/Culverts and pipelines along the route to the site*

- *Damage to any structure will require immediate notification to the Kilrush Municipal District Office - full replacement will be required to damaged structures and pipelines*
- *Post works surveys of each Bridge/Culvert structures will be required*

Response

The Applicant acknowledges the above conditions and would accept their inclusion as part of any grant of permission.

Sharing of Infrastructure

CCC have stated the following regarding the sharing of infrastructure:

- *An appropriate condition that requires the developer to ensure that other utilities can lay their services in the public road once this development has been completed*
- *A condition requiring the developer to facilitate the use by other renewable energy developments of the cable grid connection (This condition may require additional ducting, the use of Faraday shielding material etc)*
- *A condition requiring that the location of the electrical connection cables would be recorded as exactly as possible (maybe using BIM type technology) to facilitate the further use of road space for other utilities and the maintenance / construction of the public road by the Road Authority. This record should include as constructed surveys of all infrastructure altered, added, removed or relocated and exact detail of the road construction including any drains or other features encountered. The record should be lodged with the local authority and with the ESB Networks for retention on their records.*

Response

- The design of the Proposed Grid Connection allows for the concurrent use of the public road network with existing utilities/service and where the road depth/width are appropriate, can accommodate future development. The delivery and assessment of any future services or utilities is ultimately the responsibility of the relevant developer and consenting authority. Any such development will be assessed on its own merits, and should take account of the Proposed Grid Connection. It should also be noted that once operational, the ownership of the Proposed Grid Connection infrastructure will be transferred to ESNB and become part of the national grid network and any future access may be granted by ESNB thereafter.
- The Applicant is agreeable to this condition.

4.2

Contributions

Requirement

CCC have stated that the Clare Co. Council Development Contribution scheme 2025-2029 specifies a contribution rate of €10,000.00 per km for overhead and/or underground distribution lines for the distribution of electricity and or telecommunication. In the event of a grant of permission an appropriate condition in respect of same should be attached.

Response

The Applicant acknowledges the above condition and would accept its inclusion as part of any grant of permission.

5.

SUMMARY

This document has been prepared to address the observations made by Third-Party observers and Statutory Consultees including the local authorities in respect of the Proposed Grid Connection application for the proposed Cahermurphy West Wind Farm development. The information constitutes a full and robust response to all matters raised and the information provided here will directly assist the Commission in their ongoing consideration of the planning application.

The Proposed Grid Connection, through facilitation of the Proposed Wind Farm, will contribute towards the national wind energy target of 9GW by 2030. The importance of this application with regards to the climate goals cannot be overlooked.

In exercising its functions under the Climate Act, the Commission is required, insofar as practicable, to perform its functions in a manner consistent with the requirements of Section 15(1) of the Climate Act, namely:

- the most recent approved climate action plan,
- the most recent approved national long term climate action strategy,
- the most recent approved national adaptation framework and approved sectoral adaptation plans,
- the furtherance of the national climate objective, and
- the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.

In determining the application, the Commission is therefore required to have regard to these statutory obligations. In this regard, the Proposed Grid Connection through facilitation of a wind farm will make a meaningful contribution to the implementation of the Climate Action Plan, the delivery of renewable energy infrastructure, the reduction of greenhouse gases and the furtherance of the national climate objective. These are material considerations to which the Commission should attach significant weight in their assessment of the application.

Ireland has committed to decarbonising its economy by 2050. Achieving this objective will require the delivery of a renewable energy infrastructure across the Country. No single project on its own will achieve this goal, rather, this will be dependent upon the accumulation of many individual renewable energy developments. The Proposed Grid Connection, through the facilitation of a wind farm, will help to deliver a range of benefits including the following:

- Supporting the transition to a low-carbon and climate resilient society through the generation of wind energy and displacing electricity that would otherwise be produced from fossil fuel sources, thereby reducing greenhouse gas emissions,
- Providing clean, renewable, electricity to the national grid, thus contributing to the decarbonisation of the electricity sector and in the process reduce the need for imported fossil fuels for electricity, improving national energy security.
- Helping to moderate energy costs over the longer term for consumers through increased renewable energy generation.
- Delivering up to 57.6MW of onshore renewable energy, making a meaningful contribution towards the CAP25 goals of 9GW of wind energy by 2030 and a renewable electricity share of 80% by 2030.
- Contributing to the achievement of Clare County Council's renewable energy targets of a minimum of 550MW, as set out in the Clare County Development Plan 2023-2029, through development on lands identified as suitable for renewable energy generation.
- Enabling the development of a self-sustaining, secure, reliable and efficient renewable energy supply and storage for County Clare, further advancing the Council's goal of contributing to economic development and enhanced employment opportunities in the county.

- Delivering a long-term positive impact on climate by offsetting of 37,110 tonnes of CO₂ from the largely carbon-based traditional energy mix per annum, including the 134,942 tonnes of CO₂ emissions associated with the construction and operational phase of the Proposed Project in approximately 43.6 months of operation.
- Providing a significant positive benefit to the local community through the creation of sustainable local employment, contributing annual rates to the local authority and providing a local Community Benefit Fund in line with the new Renewable Electricity Support Scheme (RESS) to provide direct funding to those areas surrounding the project.

Having regard to the key points set out in this Response to Observations, it is respectfully requested that the Commission give appropriate weight to the significant contribution that the Proposed Grid Connection will make towards Ireland's National Climate Objective and, having regard to the relevant international, European, national, regional and planning context that applies to the Proposed Grid Connection and grant permission for the application as proposed.