

Response to Observations

Cahermurphy West Wind
Farm, Co. Clare

An Coimisiún Pleanála Ref
No: 324156-25



1.

INTRODUCTION

MKO have been instructed by Cahermurphy Renewables Designated Activity Company to prepare this Response to Observations from the National Parks and Wildlife Services (NPWS) and Uisce Éireann, having been invited to respond to same by An Coimisiún Pleanála (the Commission) on the 4th of September 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 stated that the deadline for submission is the 2nd of October 2026.

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 **‘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. A separate response to observations relating to the Proposed Wind Farm (Case reference: ACP-324155-26), as well as the Proposed Grid Connection planning application (Case Reference – ACP-324156-26) has already been submitted to the Commission.

All matters raised in the NPWS and Uisce Éireann submissions are fully addressed in Section 2 of this Response to Observations, with the response structured under the observation themes identified by the NPWS.

2. NPWS OBSERVATION RESPONSE

2.1 Preamble

This Response to Observations has been separated into the themes as outlined in the submission by the NPWS, which consists of the following:

- > Water Quality and Hydrological Connectivity
- > Watercourse Crossings
- > Otter
- > Wintering Birds
- > Invasive Species
- > Cumulative and In-combination Effects
- > Monitoring and Adaptive Management
- > Mitigation and Certainty

2.2 Water Quality and Hydrological Connectivity

The NPWS raised matters in relation to potential impacts on water quality, Natura 2000 sites and their qualifying interests and associated habitats, highlighting the potential of suspended solids, hydrocarbons and other pollutants to impact such. The NPWS recommends that the mitigation measures proposed throughout the EIAR and Appropriate Assessment Screening Report & Natura Impact Statement (AASR/NIS) be implemented and secured through the Construction Environmental Management Plan (CEMP) and any conditions attached to a permission.

A CEMP has been provided as Appendix 4-5 of the EIAR and shall be updated in line with any planning conditions attached to a grant of planning permission. It should be noted that it is standard the Commission to condition the full implementation of all mitigation and monitoring measures contained within the EIAR and NIS. The Applicant welcomes the imposition of such a planning condition.

2.3 Watercourse Crossings

The NPWS note that the Proposed Grid Connection involves approximately 24 mapped watercourse crossings, highlighting that particular care will be required during construction to avoid impacts on water quality and aquatic ecology. The NPWS similarly request that detailed construction methodologies be provided for the watercourse crossings, including measures to prevent the following pollution incidents:

- > Sediment mobilisation
- > Fuel or hydrocarbon contamination
- > Concrete/cementitious pollution
- > Accidental spills
- > Obstruction of watercourses

The NPWS similarly recommend that ecological and environmental supervision is provided during works at sensitive watercourse crossings.

As stated in Section 2.3.4.4 of Appendix 4-5 of the EIAR, the Proposed Grid Connection will cross all watercourses using either Horizontal Directional Drilling (HDD) or the cabling will be placed either underneath or above the culvert by open trench method. The exact methodology for each crossing is presented in the planning drawings submitted alongside the EIAR, and mitigation and monitoring

measures to be adhered to are located within the Surface Water Management Plan (SWMP), included as Appendix 4-7 to the EIAR (See Section 2.5 of the SWMP for a list of mitigation measures, Section 3 for management measures and Section 4 for Monitoring Measures).

A dedicated Ecological Clerk of Works (ECoW) and Project Hydrologist shall oversee watercourse crossing works at all sensitive watercourse crossings. The ECoW will have the power to halt the works, should the need arise and will be supported by the developer to ensure the contractor adheres to such an instruction.

2.4

Otter

The NPWS note that the impact assessment identifies the potential for impacts associated with construction activities and watercourse crossings on Otter, a qualifying interest of the Lower River Shannon Special Area of Conservation (SAC). The NPWS note the proposed mitigation measures for the protection of Otter and its associated habitat and recommends that pre-construction surveys are undertaken where appropriate to confirm the status of any Otter holts or resting places that may be affected. The NPWS similarly state that watercourse crossings and associated fencing should be designed and maintained to ensure that Otter movement and connectivity be retained.

As stated in Section 6.5.2.5.2 of Chapter 6: ‘Biodiversity’ of the EIAR, in the event of a grant of planning permission, a pre-construction otter survey will be carried out by a qualified ecologist to identify the presence of any breeding sites along the Proposed Grid Connection route, that may have been established in the intervening period. It should be noted that no in-stream works are proposed along the Proposed Grid Connection and as such, watercourse crossing works will not limit the movement of Otter at any location.

2.5

Wintering Birds

It is noted that the NPWS welcomes the proposal to restrict construction activities within 500 metres of the River Shannon and River Fergus SPA (i.e. no construction works will be undertaken within 500m of the SAC between October-March). In the event of a grant of planning permission, the Applicant shall update the construction drawings to denote these restricted areas and welcomes the imposition of any planning condition requiring such. Any such restricted zones will also be included within the CEMP, which shall be updated prior to any construction works occurring.

2.6

Invasive Species

It is noted that the NPWS welcomes the proposed Invasive Species Management Plan (ISMP), included as Appendix 6-4 of the EIAR. MKO acknowledges the recommendation for the ISMP to be fully incorporated into the construction environmental management arrangements. MKO wish to clarify that the purpose of the ISMP is for it to be maintained as a working document, similar to the CEMP, and be updated with the findings of pre-commencement invasive species surveys. The NPWS list a number of measures to be included within the ISMP which includes the following:

- › Machinery and equipment hygiene
- › Soil movement
- › Storage and disposal of contaminated material
- › Treatment of invasive species
- › Monitoring
- › Follow-up management

It should be noted that the above list of measures has been considered within the ISMP submitted as part of the EIAR.

2.7

Cumulative and In-combination Effects

MKO note the NPWS' comments on the cumulative and in-combination effects with other wind energy developments and projects. MKO wish to note that mitigation measures relied upon for the in-combination assessment have been clearly identified throughout the entirety of the EIAR and across all disciplines. MKO wish to clarify that the proposed mitigation measures are absolutely capable of being secured through the relevant planning permissions, and this has been done on numerous wind farm developments nationally, as it is standard for the Commission to condition the full implementation of all mitigation and monitoring measures contained within the EIAR and NIS.

2.8

Monitoring and Adaptive Management

The NPWS recommends that appropriate ecological monitoring is undertaken during construction and, where necessary, during the operational phase. Ecological monitoring for invasive species and otter is proposed at the pre-construction and construction stages along the Proposed Grid Connection where necessary. Please see Section 6.5.2.5.2 of Chapter 6: '*Biodiversity*' for details on pre-commencement otter surveys, Section 3.1.1.1 and Section 3.2.1.1 of Appendix 6-4 for details on Invasive species monitoring and Section 8 of the CEMP for a compiled list of monitoring measures to be carried out across all phases of the Proposed Project.

2.9

Mitigation and Certainty

The NPWS recommends that mitigation measures which are required to prevent the potential for adverse impact on the integrity of the European Sites identified in the NIS are expressly secured through conditions, including the CEMP, water-quality controls, watercourse crossing measures, wintering-bird restrictions, Otter protection and invasive-species management.

It should be noted that it is standard for the Commission to condition the full implementation of all mitigation and monitoring measures contained within the EIAR and NIS. The Applicant welcomes the imposition of such a planning condition.

3. **UISCE ÉIREANN OBSERVATION RESPONSE**

Uisce Éireann note that no new connections to Uisce Éireann's water and wastewater networks are proposed, that the Applicant has engaged with Uisce Éireann's diversions team and has entered a diversions agreement with Uisce Éireann, which resolves any potential interactions to Uisce Éireann's satisfaction, and that Uisce Éireann do not anticipate any impacts on their assets as a result of the Proposed Project.

MKO, nor the Applicant have any further comment regarding the above.

4.

SUMMARY

This Response to Observations acknowledges the requests of the NPWS, which do not seek to propose any new mitigation nor monitoring measures, but seek to ensure that all mitigation and monitoring measures proposed as elements of the Proposed Project are implemented in full. The Applicant welcomes the imposition of any planning conditions which would expressly secure the requirement for the Applicant to implement all mitigation and monitoring measures proposed throughout the EIAR and AASR/NIS for the protection of European designated sites downstream of the Proposed Grid Connection and their qualifying interests.

The Response to Observations also acknowledges the observations provided by Uisce Éireann, who are satisfied that the Proposed Grid Connection will not result in any impacts to any Uisce Éireann assets.

Having regard to the key clarifications and points set out in this response document, it is respectfully requested that the Commission give appropriate weight to the significant contribution that the Proposed Project 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 Project, grant permission for the application as proposed.