



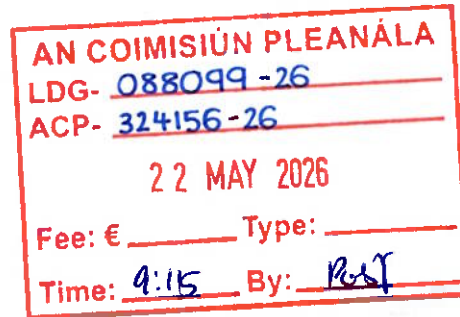
COMHAIRLE | CLARE
CONTAE AN CHLÁIR | COUNTY COUNCIL

Via Post & Email: sids@pleanala.ie

19th May 2026

Your Ref: ACP-324156-26
Our Ref: GR/EC

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902



Re: 10 Year Planning Permission for a 110kV grid connection to the national grid at the existing 110kV Moneypoint Substation located in the townlands of Cahermurphy, Cloonwhite South, Sheeaun, Leitrim, Cloonreddan, Kilmacduane East, Clooncullin, Lissanair, Teernagloghane, Brisla East and West, Gowerhass, Tullagower and others, Co. Clare

A Chara,

I refer to your letter dated 26th March 2026. The Planning Authority's submission is as follows:

1.0 Introduction

This report has been prepared in accordance with the requirements of Section 182 (A) of the Planning and Development Act, 2000, as amended, following on from the submission of an application by Cahermurphy Renewables Designated Activity Company application to An Coimisiún Pleanála for permission for a proposed development in the townlands of Cahermurphy, Cloonwhite South, Sheeaun, Leitrim, Cloonreddan, Kilmacduane East, Clooncullin, Lissanair, Teernagloghane, Brisla East, Brisla West, Gowerhass, Tullagower, Garraunnatooha, Knockerry West, Carrowfree, Derrylough, Dunneill, Doonnagurroge, Pouladarree, Carrowdotia South, Carrowdotia North Co. Clare.

The proposed development will comprise:

- i. The provision of c.25km of underground electrical cabling (110kV) from the proposed Cahermurphy West Wind Farm development to the existing Moneypoint 110kV electrical substation to facilitate a connection to the national grid;
- ii. Provision of 36 no. joint bays, communication chambers and earth sheath links along the proposed underground electrical cabling route;
- iii. Permanent and temporary Site Drainage;
- iv. Reinstatement of land, road and track surface above the proposed cabling trench;
All related site works and ancillary development considered necessary to facilitate the proposed development.
- v. A ten-year planning permission is being sought. The development subject of this application will facilitate the connection of the proposed 8 no. wind turbine Cahermurphy West Wind Farm development to the national electricity grid. A separate, concurrent planning application for the Cahermurphy West Wind Farm development is also being lodged to An Coimisiún Pleanála

An Roinn Pleanála
Pleanáil, agus Forbairt Eacnamaíoch, Tuaithe agus Pobail
Áras Contae an Chláir, Bóthar Nua, Inis, Co. an Chláir, V95 DXP2

Planning Department
Planning, Economic, Rural and Community Development
Áras Contae an Chláir, New Road, Ennis, Co. Clare, V95 DXP2

2.0 Relevant planning history relating to the subject site and the surrounding area.

20/658:

Application by MCRE Windfarm Ltd (MCRE) for the development of a windfarm of 10 no. turbines and associated works. This application is largely on the same site as the current SID application. It was refused by the Planning Authority and initially refused by An Bord Pleanála (PL03.311044 refers). Following a High Court Order that decision was quashed and remitted back to the Board (assigned file no. PL03.318525). No decision has been made on this application to date.

19/159: Permission granted for an amendment to a previously permitted Wind Farm in the townland of Cahermurphy, Kilmihil, Co. Clare (Clare County Council Pl. Ref. P14-551, An Bord Pleanála PL03.245189) A ten-year planning permission is sought for the proposed development which will amend the height of the turbine no. 3 only of the previously permitted Cahermurphy Wind Farm. The proposed development will consist of the provision of a larger wind turbine with a tip height of up to 150m (increase in tip height of 19m from the previously approved 131 m turbine) at the previously permitted location of turbine no. 3 and associated site works

18/492: Permission granted for revisions to a previously permitted electrical substation and all associated works. The proposed development constitutes a revision and reduction of the substation design previously permitted at the same location under the provisions of Clare County Council Planning Reference 14-551 (An Bord Pleanála PL03.245189)

14/551: Permission refused by Clare County Council, Granted on Appeal by An Bord Pleanála (PL03.245189) on 28/7/2016, for:

a ten year planning permission to construct a windfarm and all associated infrastructure in the townland of Cahermurphy, Kilmihil. The proposed windfarm will comprise a) the provision of a total of 4 No. wind turbines, with a maximum ground to top blade tip height of up to 131m, b) upgrading of existing and provision of new internal access roads, c) provision of a wind anemometry mast (up to 90m in height), d) borrow pit, e) an electricity sub-station with control rooms and f) associated equipment, underground electricity connection cabling, temporary construction compound and all ancillary site works, and includes the upgrading of site access junctions. The current proposed development is intended to replace an existing planning permission for a six turbine wind farm development permitted under Pl. Ref. 03-2071, as extended by Pl. Ref. 09-267 and pl. Ref. 13-507 which is valid until 2019. This application is accompanied by an Environmental Impact Statement (EIS) and Natura Impact Statement (NIS).

13-507 – Granted - to Extend the Appropriate Period of Planning Permission P09/267 and P03/2071 for a 6mw Windfarm and associated facilities.

09-267 – Granted - for Extension of Duration in respect of planning ref no. P03/2071.

03-2071 – Granted (at appeal PL03 .205692) - to erect 6 No. 1 MW wind turbines, 1 No. 40m Wind Monitoring Mast (Temporary) Service roadways and control house .

3.0 Relevant national, regional and local policies.

3.1 National Planning Framework (Project Ireland 2040)

National Policy Objective 54:

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

National Policy Objective 55:

Promote renewable energy use and generation at appropriate locations within the built and natural heritage environment to meet national objectives towards achieving a low carbon economy by 2050.

3.2 Wind Energy Development Guidelines – DHPLG – June 2006

These guidelines state that the assessments of individual wind energy development proposals need to be conducted with a “*plan led*” approach. Areas should be identified that are considered suitable or unsuitable for wind energy development. In areas identified as suitable for wind energy development there will be an assumption that such development will be acceptable in principle to the Planning Authority. The guidelines seek to assist Planning Authorities in their assessment of wind energy applications in terms of location, design, spatial context and technical considerations.

3.3 Draft Revised Wind Energy Development Guidelines DHPLG - December 2019.

At time of writing, the Draft Revised Guidelines have not yet been adopted, and the relevant guidelines remain those published in 2006.

3.4 Regional Spatial & Economic Strategy for the Southern Region (Southern Regional Assembly)

The Regional Spatial & Economic Strategy for the Southern Region came into effect on the 31st January 2020. Section 8.2 “Strategic Energy Grid” states that “There is significant potential to use renewable energy across the Region to achieve climate change emission reduction targets. With costs actively driven down by innovation in solar, onshore and offshore wind in particular, the renewable industry is increasingly cost competitive. The RSES supports renewable industries and requirements for transmission and distribution infrastructure”.

Regional Policy Objective RPO 95 ‘Sustainable Renewable Energy Generation’ states:

It is an objective to support implementation of the National Renewable Energy Action Plan (NREAP), and the Offshore Renewable Energy Plan and the implementation of mitigation measures outlined in their respective SEA and AA and leverage the Region as a leader and innovator in sustainable renewable energy generation.

Regional Policy Objective RPO 99 ‘Renewable Wind Energy’ states:

It is an objective to support the sustainable development of renewable wind energy (on shore and off shore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.

Regional Policy Objective RPO 219 ‘New Energy Infrastructure’ states:

It is an objective to support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers (subject to appropriate environmental assessment and the planning process) to ensure the energy needs of future population and economic expansion within designated growth areas and across the Region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs.

3.5 Clare County Development Plan 2023-2029 - Volume 1

The relevant policies of the Development Plan include:

CDP 2.1: Climate Action
CDP 2.2: Climate Change Mitigation, Adaption and Resilience
CDP2.14 Transition to a Low Carbon Economy and Society
CDP6.17 Energy Supply
CDP8.12 Renewable Energy Development
CDP11.44 Energy Security
CDP11.45 Electricity Networks
CDP11.47: Renewable Energy
CDP 11.48: Renewable Energy Strategy
CDP 14.2 Western Corridor Working Landscapes
CDP15.1 Biodiversity
CDP 15.5 Natural Heritage Areas and Proposed National Heritage Areas
CDP15.3 European Sites
CDP 16.8 Sites, Features and Objects of Archaeological interest
CDP 16.2 Protected structures
CDP 16.8 Archaeology and infrastructure Schemes

Vol 5 Clare Renewable Energy strategy

Development Plan Objective **RES16. 1** Renewable Energy and Supporting Infrastructure.

It is an objective of Clare County Council:

- A. To collaborate with EirGrid over the lifetime of the Strategy to ensure that County Clare has the grid infrastructure in place to maximise its potential for renewable energy generation to meet its own energy needs and to enable export to the demand market.
- B. To promote and as far as practicable facilitate Eirgrid and ESB Networks in the development and delivery of a Smart Grid with its constituent elements.
- C. To support and facilitate the emergence of a competitive supply chain economy that will sustain and assist in further developing a robust renewable energy sector in County Clare.
- D. To request medium and large scale heat / energy users to utilise waste heat and power to meet on site energy requirements and to supply or utilise future district heating networks.
- E. To request that the expansion or upgrading of existing infrastructure, including roads, ports, piers, power lines and substations etc. to support the development of renewable energy projects.
- F. To ensure that the County's ICT and broadband network enables it to be a leader in renewable energy research and development.
- G. To require planning applications for multi unit housing developments, large commercial and industrial developments to be accompanied by a feasibility study setting out the potential for incorporating district heating infrastructure into the proposed development

Development Plan Objective **RES18. 3** Community Consultation for energy projects, and community benefit

It is an objective of Clare County Council:

To encourage developers of proposed renewable energy projects to carry out community consultation in accordance with best practice and to commence the consultation at the start of project planning.

Development Plan Objective **RES18. 4** Community Benefit from Renewable Energy

It is an objective of Clare County Council:

To ensure that, wherever possible, community benefits are derived from all renewable energy development in County Clare. This will be through RESS community fund requirements, and also other voluntary approaches where RESS requirements do not apply.

4.0 Any Special Area Amenity Order which may be affected by the proposed development.

There are no Special Area Amenity orders which affect the proposed development.

5.0 European Designations, National Heritage Areas, which may be affected by the proposed development (whether in or proximate to same).

The proximity of the subject site to the following European sites is noted:

- Lower River Shannon SAC [002165]
- Carrowmore Dunes SAC [002250]
- Carrowmore Point to Spanish Point and Islands SAC [001021]
- River Shannon and River Fergus Estuaries SPA [004077]
- Mid-Clare Coast SPA [004182]

It is also noted that a NIS has been prepared for the application and it is considered that all mitigation measures should be implemented in full in the event of a grant of permission.

6.0 Protected Structures, Archaeology and Architectural Conservation Areas etc.

From examination of the route of the cable the following is noted:

- The route passes protected structure no 34 Donagrogue Castle (which is also a national Monument being a castle tower house CI 067-058).
- At the same location, but on the eastern side of the road, the zone of notification associated with CI 067-059 overlaps a section of the public road.
- At Knockerry West the route passes St Senan's Church protected structure no. 204.
- At Creagh the route passes Creagh bridge (Protected Structure no 198).

The mitigation measures as set out in Chapter 13 (Cultural Heritage) are noted and relevant conditions should be attached in the event of a grant of permission.

7.0 Availability and capacity of public surface water drainage facilities and any history of flooding relevant to the site.

The Flood Risk Assessment as set out in Appendix 9-1 is noted. All mitigation measures for surface water management should be conditioned in the event of a grant of permission.

8.0 Assessment of landscape status and visual impact, as appropriate.

The subject site is located within a 'Settled Landscape' where Objective CDP 14.2 applies. Under this designation, developments are required to demonstrate the sites have been selected to avoid visually prominent locations, that layouts avail of existing topography and vegetation to reduce visibility from scenic routes, walking trails, water bodies public amenities and roads; and that design for buildings and structures reduce visual impact through careful choice of forms, finishes and colours. Based on the specific nature of this development (underground cabling) it is not considered that the proposal would negatively impact on the visual amenities of the area.

9.0 Carrying capacity and safety of road network serving the proposed development.

The Planning Authority has serious concerns in respect of the impact of this development on the public road network, and in particular the local roads serving the site which will be mostly affected by this development. At present these roads are poor in terms of capacity and width and the subject development will inevitably give rise to impacts on the structure of the road.

In addition there is a concern that any road closures will have a knock-on impact on the wider road network by reason of diversions and use of other roads which may not have capacity for the level of traffic generated. Furthermore, the proposal in conjunction with the windfarm route works will lead to additional disturbance and road closures and the cumulative impact of such works and disturbance to the local community is of concern.

In the event that the Commission decide to grant permission for this development then appropriate conditions should be attached to incorporate the following:

Road Opening Licenses

- 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.

Road Reinstatement

- 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 CI.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.

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.

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.

Bond:

- It is recommended that a planning condition is attached to include for a bond to cover damage to national, regional and local roads that will be affected by this development.

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

The Planning Authority wishes to bring to the attention of ACP the provisions of Circular RW 05 of 2026 'Interim Guidance for the placement of Medium or High Voltage Electricity Infrastructure beneath public roads', Dept. of Transport Feb 2026, and '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' Version 2 effective from 01/03/2026, Dept of Transport. Two requirements arising are:

- No cables near existing structures – bridges, culverts etc.
- No jointing chambers in the public road.

10.0 Environmental carrying capacity of the subject site and surrounding area, and the likely significant impact arising from the proposed development, if carried out.

As set out in point no. 9, above, it is considered that the main impact of this development will be on the road network in the area.

11.0 Planning Authority view in relation to the decision to be made by the Commission.

The Planning Authority notes that the proposed cabling works are to facilitate the development of a windfarm which has been lodged separately and which a separate CE Report will be submitted to the Commission.

It is noted that the proposed windfarm is located within an area primarily designated as 'Strategic' in the Development Plan. As such from a planning policy perspective, the Planning Authority recognises that the development would, in principle, be in compliance with the designations as set out in the Plan and associated Wind Energy Strategy noting also European, national and regional level policy objectives with respect to renewable energy.

The Planning Authority notes the significant level of existing and proposed windfarm developments in the West Clare area and is concerned that the manner in which further proposals are being advanced lacks a coordinated or strategic approach. This has clear implications for the proper assessment of cumulative impacts, including roads and infrastructure impacts as is the case here.

The Planning Authority has significant concerns regarding the potential impacts of the proposed development on the public road network, particularly the local road infrastructure serving the site which is likely to experience the greatest level of impact. These roads are currently substandard in terms of width and carrying capacity, and it is considered that the proposed development would give rise to adverse effects on the structural integrity and operational performance of these routes.

Furthermore, concern arises in relation to potential road closures associated with the development, which may result in displacement of traffic onto the wider road network. Such diversions could place additional pressure on alternative routes that may not be designed to accommodate increased traffic volumes. In addition, when considered cumulatively with the proposed wind farm haulage routes and associated works, the development is likely to result in increased disruption, including further road closures and traffic management measures. The combined impact of these activities is considered likely to give rise to a significant level of disturbance and inconvenience for the local community.

12.0 Planning Authority view on community gain conditions which may be appropriate.

Having regard to the extent of underground cabling and associated infrastructure within the functional area of Clare County Council and noting the impacts of such works on the local community in terms of noise, traffic and disruption, it is respectfully requested that the Board, in the event of a grant of

permission, include relevant community gain conditions for this area. Having regard to the provision of Vol 5 (section 18.5 refers), the Council generally supports the establishment of community benefit funds for large scale energy projects.

13.0 Details of relevant Section 48/49 development contribution scheme conditions which should be attached.

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.

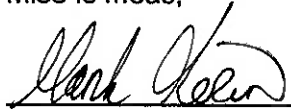
14.0 Details of any special contribution conditions which should be attached along with detailed calculations and justification for the conditions.

With the exception of a bond, it is not considered that a special development contribution is required in this instance.

Conclusion

It is respectfully requested that the Board take the above points into consideration when assessing this application.

Mise le meas,



Mark Kerin
Assistant Staff Officer
Planning, Placemaking & Economic Development