

Response to Submissions

For Development at Rathmorrissy, Pollnagroagh,
Moanbaun, Castlelambert, Knocknacreeva,
Caraunduff, Caherbriskaun, Lisheenkyle East,
Barrettspark, Cashla, Athenry, County Galway.

on behalf of Bord Gáis Energy Limited

August 2026



McCutcheon Halley
CHARTERED PLANNING CONSULTANTS

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1. Introduction

This report has been prepared by McCutcheon Halley Planning Consultants in response to third-party submissions on the planning application for the construction of a 220kV substation and 220kV underground electricity cabling connecting to the existing Cashla 220kV substation (Case Ref. ACP-324162-26).

The purpose of this report is to provide a response to the issues raised by prescribed bodies (4 no.) and the third-party submissions (82 no.) received during the statutory consultation period.

In addition to the response received from Galway County Council, submissions were received from the following prescribed bodies:

- Department of Housing, Local Government and Heritage (DHLGH)
- Transport Infrastructure Ireland (TII)
- Uisce Éireann

1.1 Scope of the Current Application

The Applicant notes at the outset that a number of third-party submissions refer to matters associated with the proposed Cashla Peaker Plant (Case Ref: ACP-324113-26). While the 220kV substation and grid connection are functionally related to the wider energy infrastructure proposals at Cashla, the subject matter of the current application is limited to the proposed 220kV substation and associated underground grid connection infrastructure to the existing Cashla 220kV Substation.

The current application relates solely to electricity transmission infrastructure, comprising the proposed 220kV substation and underground 220kV grid connection located in the townlands of Rathmorrissey, Pollnagroagh, Moanbaun, Castlambert, Knocknacreeva, Caraunduff, Caherbriskaun, Lisheenkyle East, Barrettspark, Cashla, Athenry, County Galway. These elements are the subject of the present application under sections 182A and 182B of the Planning and Development Act 2000, as amended.

For the avoidance of doubt, the proposed Cashla Peaker Plant does not form part of the development for which consent is sought in this application. The Peaker Plant, comprising a natural gas-fuelled electricity generation facility with dual-fuel capability and associated plant infrastructure, is the subject of a separate Strategic Infrastructure Development application under section 37E of the Planning and Development Act 2000, as amended (An Coimisiún Pleanála case reference: ACP-324113-26).

Similarly, the proposed gas transmission connection required to supply the generating station does not form part of the current application and will be subject to a separate consent process with the Commission for Regulation of Utilities (CRU) under section 39A of the Gas Act 1976 (as amended).

Accordingly, while the interrelationship and cumulative effects of the wider project components have been considered as part of the environmental assessment process, the proposed natural gas-fuelled electricity generation facility and associated infrastructure are not subject of the present application and will be considered by the Commission pursuant to separate statutory consent processes. Submissions relating specifically to the design or consent of those infrastructure elements should therefore be considered in the context of those separate applications and statutory assessment processes.

1.2 EPA Licensing and Environmental Regulation

All emissions to the environment arising from the operation of the Cashla Peaker Plant (An Coimisiún Pleanála case reference: ACP-324113-26) will be subject to regulation by the Environmental Protection Agency (EPA) under the Industrial Emissions licensing regime. Reference to the Industrial Emissions Licence (IEL) is made where relevant below however, it is important to note that the proposed 220kV substation and 220kV grid connection subject of this planning application will not form part of the applicable Industrial Emissions Licence (IEL) boundary. The construction and operational phases of the proposed 220kV substation and grid connection will adhere to the mitigation measures set out in the accompanying Environmental Impact Assessment Report (EIAR) along with any planning conditions attached to a grant of permission.

1.3 Structure of Report

The report is structured as follows:

- A summary and response to key issues raised by Galway County Council is provided in Section 2.
- A summary and response to key issues raised by prescribed bodies is provided in Section 3. Where an issue has been addressed in an earlier comment, a cross-reference is provided to the response.
- A summary of the key issues raised in the third-party submissions is outlined in Section 4. Due to the volume of third-party submissions received, and the nature of these submissions which largely followed a standardised template, the key issues raised are addressed thematically. Where an issue has been addressed in an earlier comment, a cross-reference is provided to the response.

2. Response to Galway County Council

2.1.1 Principle of Development and Planning Policy

Galway County Council acknowledges that the selected site benefits from proximity to existing gas transmission and electricity grid infrastructure, land availability and the absence of significant environmental constraints. The Council noted the strategic policy context for the proposed 220kV substation and grid connection and considered that *“the principle of the proposed use of the subject site for electricity generation would be fully consistent with the proper planning and sustainable development of the area as well as with Government’s most up-to-date policy on climate change, facilitating the transition to increased renewable energy outputs, energy efficiency and the imperative requirement for decarbonising of the country’s electricity generation system”*.

Response

Galway County Council concluded that the principle of the proposed development is consistent with national, regional and local planning policy and would contribute to security of electricity supply and the transition to increased renewable generation. The Applicant considers that this represents significant support from the Planning Authority for the overall planning merits of the proposal.

2.1.2 Public Consultation

Galway County Council noted that the applicant submitted a non-statutory Public Consultation Report outlining the engagement undertaken with the local community and other stakeholders in advance of the application. The Planning Authority was satisfied that the Applicant sought to engage with the public and relevant stakeholders in an appropriate and transparent manner prior to lodgement of the application.

Response

The consultation process informed a number of refinements to the proposed development and ensured that issues raised by local residents and stakeholders were considered during project evolution. While not all concerns could be resolved, the engagement process formed an important part of the design development and environmental assessment process.

The Applicant welcomes Galway County Council’s comments in relation to the public consultation approach adopted in advance of the submission of the planning application. The Applicant notes the Planning Authority’s satisfaction that engagement with the local community and relevant stakeholders was undertaken in an appropriate and transparent manner as part of the pre-application consultation process.

2.1.3 Visual Impact, Design and Layout

The Council noted that the site is located within the Central Galway Complex Landscape Character Area, which is classified as having low landscape sensitivity, and is not located within the vicinity of a designated scenic route or protected viewpoint. While the LVIA indicates that the development would intensify industrial development in the local landscape, particularly when considered cumulatively with existing and proposed energy infrastructure, the Council referred to the wider policy context and recent case law which indicates that renewable energy and energy security objectives may carry significant weight relative to localised landscape and visual impacts.

Response

The Applicant notes Galway County Council's comments in relation to the landscape and visual context of the proposed development, including the rural character of the receiving environment, the presence of dispersed residential receptors, and the wider infrastructural context associated with the M17 and M6/M18 junction.

The Landscape and Visual Impact Assessment carried out as part of Chapter 6 Landscape and Visual, Volume 2 of the EIAR provides a detailed assessment of the receiving landscape, visual receptors and cumulative context. The Applicant notes that the site is located within a Class 1 low landscape sensitivity area, is not within or adjoining any designated scenic route or protected view and is situated within a landscape already influenced by strategic transport infrastructure and existing and proposed energy infrastructure.

It is acknowledged that the proposed development will introduce additional built infrastructure into the local landscape and that, for certain nearby residential receptors, visual effects may be experienced depending on orientation, distance, intervening screening and the extent to which existing infrastructure is already visible. The LVIA concludes that operational effects on the Central Galway Complex Landscape Type would be Slight Adverse and that effects on the Urban Environs/Athenry Landscape Character Type would be Neutral.

The design and layout of the proposed development have been informed by the findings of the LVIA and the broader environmental assessment process. Mitigation measures, including appropriate siting, layout, external finishes, boundary treatment and landscape planting, will assist in integrating the development into the receiving environment and reducing visual prominence over time.

While the development will introduce additional built infrastructure into the receiving landscape, the LVIA concludes that operational landscape effects will be Slight Adverse on the Central Galway Complex Landscape Type and Neutral on the Urban Environs/Athenry Landscape Character Type. The assessment also identifies significant visual effects for a limited number of nearby receptors, while effects beyond the immediate vicinity are assessed as slight or neutral and not significant in EIAR terms. Accordingly, the landscape and visual effects do not outweigh the wider planning and policy benefits associated with the proposed development. The Applicant further notes the Planning Authority's acknowledgement that, while cumulative landscape and visual effects must be

considered, the proposed development is to be assessed in the context of national energy policy, renewable energy transition objectives and security of electricity supply and in accordance with the statutory 'national climate objective' and duties of relevant bodies under Sections 3 and 15, respectively, of the Climate Action and Low Carbon Development Act 2015 (as amended) (the "Climate Act") and the decision of the Supreme Court in Coolglass Wind Farm Limited v An Coimisiún Pleanála [2026] IESC 5". These matters are of significant public interest and carry substantial weight in the overall planning balance.

2.1.4 Designated Sites, Appropriate Assessment and EIAR

The Council noted that there are no European Sites within the application boundary, but that potential hydrogeological pathways have been identified to Galway Bay Complex SAC, Inner Galway Bay SPA and Cregganna Marsh SPA. The submission noted that a Natura Impact Statement has been submitted and states that An Coimisiún Pleanála, as competent authority, should be satisfied that the proposal will not adversely affect the integrity of the European Sites network. The Council also noted that an EIAR has been submitted and that the Commission should be satisfied that the EIAR is sufficient to inform its determination and that the proposed development would not give rise to significant effects on the receiving environment.

Response

The Applicant notes Galway County Council's comments in relation to designated sites, Appropriate Assessment and Environmental Impact Assessment. A Natura Impact Statement and EIAR were submitted with the application and provide a detailed assessment of the potential effects of the proposed development, including consideration of potential hydrogeological pathways to Galway Bay Complex SAC, Inner Galway Bay SPA and Cregganna Marsh SPA.

The Applicant considers that the NIS provides the necessary information to enable An Coimisiún Pleanála, as competent authority, to undertake Appropriate Assessment and to conclude, beyond reasonable scientific doubt, that the proposed development, either alone or in combination with other plans or projects, will not adversely affect the integrity of any European site, subject to the implementation of the mitigation measures identified. Accordingly, the information submitted enables the Commission to conclude that the proposed development will not adversely affect the integrity of any European Site, either alone or in combination with other plans or projects.

The EIAR also provides a comprehensive assessment of the likely significant effects of the proposed development on the receiving environment, including land, soils, geology, water, biodiversity and related pathways.

2.1.5 Roads and Transportation

Galway County Council's Roads and Transportation Department raised a range of detailed concerns in relation to the proposed site access, the adequacy of the supporting traffic and transport documentation, the design and location of grid connection infrastructure within the public road, construction traffic management, abnormal load movements, and the protection and reinstatement of the public road network. It recommended that these matters be addressed through revised design information, technical assessments, road safety audits, management plans, licence requirements and specific conditions in the event of a grant of permission. The specific concerns are summarised in sections 2.1.5.1 to 2.1.5.8 below (inclusive). The specific conditions are addressed in Appendix 1.

2.1.5.1 Road Safety Traffic Concerns: Road Safety Auditing, Sightlines, Stopping Sight Distances and Forward Visibility

The Roads Department stated that sightlines and stopping sight distances for the proposed permanent substation entrance had not been adequately demonstrated. It requested revised site layout and longitudinal information, based on detailed topographical survey data, to show that 90m visibility can be achieved from a setback distance of 2.4m from the road edge. Supporting photographs were requested, together with details of any required boundary setbacks, including roadside walls, vegetation and stationary roadside objects such as overhead service poles. It also requested that the vertical envelope of visibility be demonstrated in accordance with the relevant TII standards. In addition, Galway County Council requested that any third-party boundaries affected by required sightline splays be clearly identified on revised drawings, and that written consent and supporting ownership details be provided where lands outside the applicant's control are needed to achieve visibility standards. The Roads Department also noted the absence of a Stage 1 / Stage 2 Road Safety Audit and required that such an audit be undertaken for the entire scheme, with all issues raised to be addressed in revised layouts. It further stated that a detailed Traffic and Transport Assessment should be prepared in accordance with TII guidance, and that this assessment should also consider indirect road safety impacts, including the effect of the proposed 20m public lighting mast and the absence of lux contouring and glare assessment.

Response

The Applicant notes that the proposed 220kV substation is located within the boundary of the proposed Cashla Peaker Plant site (Case Ref. ACP-324113-26) and will be accessed via the proposed entrance forming part of that separate application. Matters relating to site access, sightlines and boundary setbacks were raised by Galway County Council in its submission on the Cashla Peaker Plant planning application and were addressed in the Applicant's response to submissions under that application.

In relation to the traffic assessment, the proposed development is below the thresholds requiring a full Traffic and Transport Assessment (TTA) due to the lack of operational trip generation. Table 2.1 within PE-PDV-02045 - Traffic and

Transport Assessment Guidelines (TII) provides a list of thresholds at which the production of Traffic and Transport Assessments in relation to planning applications is recommended. The fundamental basis for the thresholds are related to trip generation – specifically in the operational phase. The proposed project is unique in that, during the operational phase, the trip generation is essentially nil. As a result, the development was determined to be sub-threshold.

A detailed assessment was, however, undertaken to determine and mitigate impacts during the construction phase. The details of this assessment are provided in Chapter 10 (Traffic), Volume 2 of the EIAR which includes details of the proposed Construction Traffic Management Plan (CTMP), Outline Construction Traffic Management Plan (OCTMP), Haulage Routes Pavement Analysis and a Haulage Routes Structural Assessment. Reference should also be made to section 4.2 of this report responding to matters raised in public submissions in relation to roads and traffic in conjunction with the above.

With regard to road safety auditing, a Stage 1/2 Road Safety Audit is not required for the grid connection given that there are no material impacts on the existing road/active travel network during the operational phase and construction phase impacts are not within the scope of a RSA.

In respect of indirect road safety impacts associated with the proposed 20 m lighting mast, the mast forms part of the internal site lighting scheme and is not intended to illuminate the public road network. The detailed lighting design will be developed during the detailed design stage and will be designed to minimise light spill beyond the site boundary. The lighting scheme will incorporate directional luminaires, shielding and appropriate beam control measures to avoid glare or distraction to road users on the surrounding road network. A detailed lighting assessment, including lux contouring and glare analysis, will be completed during detailed design to demonstrate compliance with the relevant lighting standards and to confirm that the proposed lighting installation will not adversely affect road safety on the surrounding road network, including the strategic road network where relevant.

2.1.5.2 Site-Specific Grid Connection Infrastructure Drawings and Relocation of Joint Slabs

Galway County Council raised a concern regarding the proposed location of 10 no. joint bays and associated communications infrastructure within the public road carriageway. It considered that the scale and depth of the proposed structures would effectively sterilise the roadway and interfere with the Council's ability to undertake future drainage, watermain and service connection works. It therefore requested that the joint slabs be relocated off the public road and positioned within adjacent lands under the applicant's control as it had not been demonstrated that no practical off-carriageway alternative exists. The Roads Department also required that any joint bay structures be subject to a Technical Acceptance Report in accordance with the relevant standards and circulars, including certification from the relevant design, assessment and checking parties. Clarification was also requested regarding the type of lids proposed, compliance with TII standards, backfill

and compaction standards, and ongoing maintenance responsibility for link box and chamber lids.

Response

EirGrid have been engaging with the Roads Sector and other key stakeholders for the last two or so years, on the understanding of the impacts and opportunities for laying HV cable in roads through a HV Forum. Through this working group, the focus is on consolidating all the specifications from the participating TII, Regional Management Offices (RMO) and EirGrid/ESBN relating to cables in roads. The understanding of this is that the final consolidated specification is not readily available. Albeit the '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' are welcomed, the technical working group still yet has to conclude on a final document, that aligns with the current EirGrid functional specifications.

As the work within the technical working group will still take time to be completed, the Department of Transport (DoT) prepared the aforementioned interim guidance note for Roads Authorities, which is understood to support authorities when reviewing planning submissions and engaging with developers. It is intended that it is interim. Not all the criteria within the guidance note are consistent with the current EirGrid specifications. The current design complies with the EirGrid standards, cognizant of the interim guidance where it is practical and technically feasible.

The placement of Joint Bays (10 in total) for this project has been strategically sited within natural widenings, hard shoulder areas, or access/ entrances into arable lands where available. 5 Joint Bays out of 10 in total are sited off the road curtilage as follows:

- *Joint Bay 01 within the Cashla Substation bell mouth*
- *Joint Bay 03 Discarded section of local road @ Ch1480m*
- *Joint Bay 05 with widened section of roadway @Ch.3190m*
- *Joint Bay 08, discarded section of local road @Ch.5850m*
- *Joint Bay 10 OCGT access road*

The remaining joint bays are located within the road curtilage (refer to the Construction Grid Connection Report enclosed in Appendix 2-7, Volume 3 of the EIAR). Galway County Council have raised concerns relating to the scale and depth of the proposed structures and the impact this could have on sterilising the roadway and interfering with the Council's ability to undertake future drainage, watermain and service connection works are noted. As set out in the planning application drawings the current proposal provides for a minimum depth of cover above Joint Bays of 300mm in paved roads (refer to Drawing Ref. 300101269-DR-136-P2, Note 8B). The 5 no joint bays which are proposed within the road carriageway will be installed with a cover depth of 600 mm, ensuring sufficient clearance to accommodate future maintenance and drainage works while protecting the underlying cable infrastructure.

In accordance with the Department of Transport's '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' (March 2026), the Joint Bay structures within the road will conform to standards required by the Roads Authorities and will have a concrete lid, unless exceptional circumstances arise and are otherwise agreed with the Roads Authority. The detailed design of the joint bay structures, Communication chambers, Earth Link boxes will be agreed with the roads authority via Technical Acceptance of joint box/bay and ancillary chamber structures beneath regional and/or local roads, carried out in accordance with DOT Circular RW 10/2021. All works shall be designed and carried out in accordance with the relevant Transport Infrastructure Ireland (TII) standards, specifications and requirements, including those relating to road openings, reinstatement, materials, workmanship, inspection and certification. Backfilling and compaction shall be completed using approved materials and methods to achieve the required bearing capacity, settlement control and surface reinstatement standard, with records retained where required to demonstrate compliance. The installation, reinstatement and final finish around all link boxes, chambers and associated covers shall be completed to a safe and durable standard, ensuring that lids are correctly seated, level with the surrounding surface, traffic-rated where applicable, and do not present a hazard to road users, pedestrians or maintenance personnel. Responsibility for the ongoing inspection, maintenance, repair and replacement of link box and chamber lids shall remain clearly assigned, including prompt action where defects, rocking covers, settlement, damage or safety concerns are identified.

In this regard, the applicant welcomes inclusion of condition 14 (Xiii) as set out in Galway County Council's submission on the planning application and as detailed in Appendix 1 of this report.

2.1.5.3 Haulage Route Analysis

The Roads Department requested a full haulage route analysis identifying all works required to accommodate construction and abnormal loads. This is to include any amendments to existing junctions, road widening, edge strengthening, signage measures, and tree or hedge clearance, together with articulated and abnormal load swept path analysis.

Response

A full haulage route analysis was undertaken for both abnormal load movements and construction-related vehicle access. This included a structural appraisal of bridges and structures (refer to Cashla Peaker Plant – Abnormal Load Assessment Report included in Appendix 2-6, Volume 3 of the EIAR. Document Ref. 0114485DG0025), pavement assessment (refer to Cashla Peaker Plant Pavement Analysis provided in Appendix 2-4, Volume 3 of the EIAR. Document Ref. 0114485DG0032), and AutoTrack swept path analysis of articulated and abnormal load vehicles. A summary of the haulage assessment is provided in Section 10.4.6 of the EIAR, with extracts from the full swept path analysis included in Section 11.4 of the Civil Engineering Planning Report (Document Ref: PEK3-ATR-ZZ-ZZ-RP-CE-300001 enclosed in Appendix 2-1 in Volume 3: Appendices of the EIAR).

The assessment identified a limited number of locations where temporary traffic management measures will be required, including at the Port Access on the Yellow Route, the transfer from the L5034 to the Tuam Road, and the right turn from the R339 to the R381 on the Red Route. Temporary signage removal and temporary relocation of street furniture were also identified where necessary to facilitate abnormal load movements. No tree or hedge clearance was identified as necessary. No road widening, junction amendments, edge strengthening, or pavement strengthening works were identified as necessary on the adopted haulage route. While widening at the R339/L3103 junction was identified as potentially required on one assessed option, that route was discounted due to the insufficient load-bearing capacity of the two-span bridge, as set out in the aforementioned Abnormal Load Assessment Report. The pavement assessment confirmed that the existing road network will retain adequate residual service life following the abnormal load deliveries.

2.1.5.4 Construction Traffic Route

In relation to the grid connection works, Galway County Council requested details of the proposed construction traffic routes for concrete, tarmacadam and stone deliveries. It also requested a draft construction programme setting out the timing of ducting works, joint chamber construction, cable transport, cable pulling and jointing works. The Roads Department stated that the traffic management proposals should be revised to reduce the duration of road closures and minimise impacts on the public road margin, including consideration of alternative methodologies and the use of strategic passing bays to facilitate cabling and jointing works while maintaining traffic movement on narrow local roads.

Response

It should be noted that the proposed closure timeframes represent a conservative scenario and are anticipated to be shorter than those indicated in the planning application.

As part of the Construction Traffic Management Plan (refer to Appendix 2.11 CTMP in Volume 3 of the EIAR, Document Ref: PEK3-ATR-ZZ-ZZ-RP-CE-300002) that was developed for the planning application, construction haul routes were identified in the vicinity of the site. These routes cover the national and regional road network. Haul routes for specific materials can only be identified once a contractor has been appointed. This principle also applies to the detailed programme for the timing of ducting works, joint chamber construction, cable transport, cable pulling and jointing works which will be developed prior to construction.

In addition, a detailed construction traffic management plan (CTMP) has been developed for the sections which will be subject to road closures. The CTMP provides details on routing of construction traffic, timing of material deliveries, detours during road segment closure periods and emergency procedures. It also notes that cable joint chambers have been designed in strategic locations (such as junctions and wider roads) and to increased depths in order to reduce the impacts of traffic disruption as well as potential road sterilisation.

As recommended by Galway County Council, the applicant welcomes the inclusion of a condition requiring a final CTMP to be submitted to the Roads Authority for agreement in advance of commencement of development (see Condition 18(i) of Appendix 1 of this report).

2.1.5.5 Transport Load Assessment

The Roads Department requested an assessment of the laden weight of HGVs and articulated vehicles transporting abnormal loads, with particular regard to route suitability and the capacity of culverts and bridges along the route.

Response

The laden weight of the transport vehicle, including the trailer, has been fully incorporated into the assessment. As outlined in Section 3.3.3 and Table 3-2 of the Abnormal Load Assessment Report, Appendix 2-6, Volume 3 of the EIAR, the applied loads are based on gross trailer weights (i.e. cargo + trailer), from which axle loads were derived and applied in the structural models.

With respect to the assessment methodology, the Abnormal Load Assessment Report follows the TII exceptional abnormal load assessment process, whereby a comparative assessment is undertaken in the first instance. The load effects from the EAL vehicle were directly compared against the governing design load models (HA+HB and LM1+LM3), as presented in Tables 5-1 and 5-2 of the Abnormal Load Assessment Report

In accordance with TII AM-STR-06048, a detailed capacity assessment is only required where the EAL load effects exceed the design load effects. As the comparative assessment demonstrated that the EAL effects are lower than the design effects for all structures on the preferred route (with the exception of DC-M17-005.00), no further capacity calculations were required.

While the comparative assessment identified DC-M17-005.00 as the only structure where the Exceptional Abnormal Load (EAL) effects exceeded the governing design load effects, this structure is located on the Red Route. Following the route appraisal, the Blue Route was identified as the preferred and viable transport route, as all structures along this route were demonstrated to safely accommodate the proposed EALs through the comparative assessment. In contrast, the Red Route presents a number of significant operational constraints, including tight turning movements and overhead electrical infrastructure, which adversely affect its suitability for the transport of the proposed loads. As the Red Route is not required for the transport operation and is not proposed as part of the preferred haul route, a detailed capacity assessment of DC-M17-005.00 was not considered necessary. Consequently, the assessment effort was focused on the preferred Blue Route, which has been demonstrated to be structurally suitable for the proposed abnormal load movements in accordance with the TII assessment methodology.

2.1.5.6 Directional Drilling in Proximity to Motorway Bridges

Galway County Council stated that a detailed structural survey would be required where directional drilling is proposed in proximity to motorway bridge structures.

Response

Detailed confirmatory surveys of each TII Eirspan Bridge encountered will be carried out, executing Principal Inspection Task Orders which are issued by TII or the Local Authority, to inform the detailed design phase. These will be assessed by including inspections, assessment and report preparation of structures.

Risk assessment and Method statements will be conducted by an approved Department of Transport (DTTAS) Bridge Asset Management System (BAMS) Qualified Engineering Inspector.

2.1.5.7 Culvert Installation Restriction

The Roads Department expressly noted that ducting installations over culverts within the public road would not be permitted.

Response

The Roads Authority's comment on culverts are noted and the applicant can confirm that the ducting installation will be carried out in accordance with Eirgrid's 220kV functional specification guidance. The 220kV cable route will be routed under existing infrastructure as recommended in the guidance document. Should exceptional circumstances arise, alternative arrangements will be subject to agreement with EirGrid, to ensure compliance with the applicable standards, and the Roads Authority.

2.1.5.8 Road Opening Licence Requirement and Road Closure

Galway County Council advised that any works affecting the public road network, including junction works and grid connection infrastructure, would require a Road Opening Licence and possibly a Road Closure Licence. It also stated that preliminary trial holes under a Road Opening Licence would be required to confirm the cable route, and that separate licences and possible closures would be needed for the main construction works. The Council also advised that separate consent under Section 53 of the Roads Act 1993 will be required for the proposed M6 and M17 motorway crossings.

Response

The Applicant acknowledges these requirements and confirms that all works within the public road will be undertaken in full compliance with the requirements of Galway County Council and the relevant statutory provisions. All necessary Road Opening Licences, traffic management approvals and any associated road closure consents will be obtained in advance of the commencement of works. Works will be planned and implemented in consultation with the Roads Authority to minimise disruption to road users and to ensure that all reinstatement is carried out in accordance with the applicable standards and specifications.

2.1.6 Water and Wastewater

The Council noted the assessment of hydrology, hydro-ecology, hydrogeology and drainage in the EIAR. It identifies the presence of a regionally important aquifer and potential karst formations beneath the site, together with the relationship to the Galway Bay Groundwater Dependent Terrestrial Ecosystem. Where permission is granted, the Council

recommends conditions requiring appropriate agreement in respect of water supply and wastewater treatment and requiring surface water to be disposed of within the site and not discharged onto the public road or adjoining lands.

Response

The Council's confirmation that the proposed development will not have significant effects on receiving water bodies is acknowledged. The recommended conditions are welcomed (refer to Appendix 1 of this report). The proposed development has been designed, specifically taking account of the hydrogeological sensitivity of the site. A robust engineering design has been developed for the project, informed by the site specific geological and hydrogeological conditions, including the potential presence of onsite subsurface karst geology. Section 11.4.2., Chapter 11 Land Soils and Geology, Volume 2 of the EIAR, sets out in detail the key design mitigation measures which have informed the iterative design process, and Environmental Impact Assessment (EIAR). These measures will ensure that the proposed development does not give rise to significant effects from the outset.

Key extracts from Section 11.4.2., Chapter 11 Land Soils and Geology, Volume 2 of the EIAR are replicated for ease as follows:

'11.4.2.1 Engineering measures (potential structural / geotechnical risk)

A robust karst protocol will be adapted during foundation construction comprising the following:

- *Soil strip across each foundation footprint to expose the bedrock surface.*
- *Targeted closely spaced proof coring to confirm the presence of any possible Karst within 15 to 20m of the bedrock surface.*
- *If no significant voids or Karst features are encountered during the proof coring process then Foundation Solution 1 will be adapted.*
- *If a significant Karst feature is encountered during the proof coring process then Foundation Solution 2 will be adapted.'*

The proposed substation will be provided with surface water drainage infrastructure designed in accordance with applicable industry standards and best practice. Surface water generated within the substation compound will be discharged to the Cashla Peaker Plant storm sewer network which is described in a separate application to the Planning Authority and covered with the EIAR.

The underground grid connection principally comprises buried electrical infrastructure and does not give rise to wastewater discharges during operation. The cable route will be reinstated following construction

The Applicant further notes that the closest public water supply reservoir (Ballydavid Reservoir) is located in excess of 4 km from the proposed development and that the EIAR concluded that the risk to this receptor is negligible due to the separation distance and limited interaction between the proposed development and groundwater resources.

Having regard to the embedded design measures, construction controls and findings of the EIAR, the Applicant confirms that the proposed 220kV substation

and underground grid connection will not have a significant effect on receiving water bodies, groundwater resources, hydrogeological receptors or groundwater dependent terrestrial ecosystems during either the construction or operational phases, as clearly demonstrated in Chapter 5 Biodiversity, Chapter 11 Land Soils and Geology and Chapter 12 Water, Volume 2 of the EIAR.

2.1.7 Flood Risk

The Council noted that the submitted site-specific Flood Risk Assessment concludes that the proposed development is not at significant flood risk, that no historic flooding was identified, that no alluvium deposits were present on site, and that OPW mapping places the site within Flood Zone C. Where An Coimisiún Pleanála is minded to grant permission, the Council stated that it should be satisfied that the proposed development would not have a significant effect on the receiving environment or give rise to flood risk impacts.

Response

The Applicant notes the Planning Authority's observations in respect of flood risk and confirms that a Stage 1 Flood Risk Assessment has been undertaken in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities. The assessment concluded that the proposed development is not at significant risk of flooding, that no historic flooding has been identified within the project area, that no alluvial deposits are present, and that the entirety of the proposed 220kV substation site and underground grid connection route is located within Flood Zone C (Low Probability of Flooding).

The Applicant further notes that the current application relates solely to the proposed 220kV substation and associated underground grid connection infrastructure. The Cashla Peaker Plant forms part of a separate planning application and is not the subject of the current consent application. This distinction is set out within the application documentation.

Surface water drainage from the proposed substation will discharge to the drainage infrastructure being provided as part of the separately consented Peaker Plant development. The proposed underground grid connection comprises predominantly buried electrical infrastructure and does not introduce any significant impediment to overland flow paths, flood storage areas, or conveyance routes. As such, the installation and operation of the grid connection will not alter flood risk elsewhere, increase flood risk to adjacent lands, or give rise to residual flood risk impacts.

Accordingly, having regard to the findings of the Flood Risk Assessment, the location of the development entirely within Flood Zone C, and the nature of the proposed works, the Applicant considers that the proposed 220kV substation and grid connection will not have a significant adverse effect on the receiving environment in terms of flood risk and will neither generate nor exacerbate flood risk on-site or elsewhere.

2.1.8 Air Quality and Emissions

The Council noted the EIAR conclusions that dust and air quality impacts can be appropriately mitigated and that the proposed development would not

have a significant effect on air quality, subject to the implementation of the identified mitigation measures. In the event of a grant of permission, the Council recommends conditions requiring a dust and emissions monitoring programme, including any mitigation measures, to be agreed with the Planning Authority.

Response

This recommendation is noted. All mitigation measures, as outlined in Chapter 7 Air Quality, and Chapter 18 Schedule of Environmental Commitments, Volume 2 of the EIAR, will be fully implemented, as relevant throughout the project. The requirement for dust and emissions monitoring is consistent with the relevant monitoring commitments as detailed in Section 7.8.1, Section 7.8.2 and Section 7.8.3, Volume 2 of the EIAR, which is replicated for ease as follows:

7.8.1 Construction Phase

Monitoring of construction dust deposition along the site boundary to nearby sensitive receptors during the construction phase of the Proposed Project (i.e. proposed 220kV substation site and underground grid connection route) will be carried out to ensure mitigation measures are working satisfactorily. This will be carried out using the Bergerhoff method in accordance with the requirements of the German Standard VDI 2119. The Bergerhoff Gauge consists of a collecting vessel and a stand with a protecting gauge. The collecting vessel is secured to the stand with the opening of the collecting vessel located approximately 2m above ground level. The TA Luft limit value is 350 mg/m²/day during the monitoring period of 30 days (+/- 2 days).

7.8.2 Operational Phase

There will be no operational air emissions associated with the Proposed Project i.e. proposed 220kV substation site and underground grid connection route. Air Quality monitoring is not required for this element of the Project.

7.8.3 Decommissioning Phase

The proposed 220kV substation and grid connection will become Eirgrid assets once operational and will become a permanent node on the transmission network as such no decommissioning phase is anticipated.

2.1.9 Noise and Vibration

The Council noted the EIAR conclusions that operational noise can comply with relevant standards and that construction noise effects are predicted to be short-term and slight to moderate in nature. In the event of a grant of permission, the Council recommends conditions requiring a noise compliance monitoring programme, implementation of appropriate mitigation measures, and compliance with specified construction working hours.

Response

This recommendation is noted and a response to the proposed conditions is provided in Appendix 1 of this report. All mitigation measures, as clearly outlined in Chapter 9 Noise and Vibration, and Chapter 18 Schedule of Environmental Commitments, Volume 2 of the EIAR, will be fully implemented, as relevant throughout the project.

Underground Cable Construction

Section 9.8.1.2 of Volume 2 the EIAR notes that the nearest Noise Sensitive Locations (NSLs), are at distances of the order of 10 to 30m from the underground electrical cable route.

The construction of the proposed underground cable will progress along the cable route in sections of 30–50 m per day. Works will therefore be in proximity to any individual NSLs for limited amount of time, no greater than one day. Given the absence of any significant impacts at NSLs due to the rolling method of construction, monitoring is not required.

Horizontal Directional Drilling

Section 9.8.1.3 of Volume 2 the EIAR notes that Horizontal Direction Drilling (HDD) construction method will be used at 3 crossing points with M6 motorway and M17 motorway to install cable ducts under the motorway. Micro-tunnelling machinery will be used to construct a lined tunnel through which the transmission cable duct will pass. The closest NSLs are at distances of between 45 to 90m from these crossing points. The calculated noise levels are below the daytime construction noise limits and there are no significant effects predicted relating to this activity. In this instance, noise monitoring is not proposed for HDD sites as standard.

Operational Phase

Once constructed, there are no operational noise emissions associated with the underground cable connection. Noise monitoring is not required for this element of the Project.

For clarity, the proposed 220kV substation and grid connection will become EirGrid assets once operational and will become a permanent node on the transmission network.

2.1.10 Fuel Storage, COMAH and Other Consents

The Council noted the proposed use and storage of low sulphur diesel associated with the wider Peaker Plant project and acknowledges that the

development will constitute a lower-tier COMAH establishment. It also notes that the facility will require an Industrial Emissions Licence from the EPA and that separate consents and licences may be required under other statutory codes, including fire safety, road opening, waste, environmental health, public health and archaeological legislation. The Council recommends that any permission should include conditions addressing bunded storage, hydrocarbon management, waste management and environmental monitoring.

Response

To clarify, the proposed 220kV substation and grid connection does not constitute a lower-tier establishment itself but is associated with the Cashla Peaker Plant which in itself will constitute a lower-tier COMAH establishment. In this regard the above points are noted, and are consistent with the following:

- *Proposed development design, as submitted within the planning application;*
- *Volume 2 of the EIAR (specifically Chapter 7 Air Quality, Chapter 8 Climate, Chapter 9 Noise and Vibration, Chapter 11 Land, Soils and Geology, Chapter 12 Water, Chapter 15 Major Accidents and Disasters, and Chapter 18 Schedule of Environmental Commitments);*
- *Volume 3 of the EIAR, Appendix 15-1 COMAH Land Use Planning Assessment.*

Furthermore, it is noted that the submission made by the HSA on the Cashla Peaker Plant application (Case Ref: ACP-324113-26) confirmed that the siting criteria for new establishments have been met and did not advise against permission on major accident hazard grounds.

2.1.11 Recommended Conditions

Overall, Galway County Council recommended a comprehensive suite of conditions addressing environmental mitigation and monitoring, Natura Impact Statement mitigation, water and wastewater, reinstatement bonds, noise and emissions monitoring, waste management, road safety, traffic management, road condition surveys, public road reinstatement, construction management and community gain.

Response

Refer to Appendix 1 for details of Applicant's response to each recommended condition.

3. Response to Prescribed Bodies

3.1 Department of Housing, Local Government and Heritage

3.1.1 Archaeology

The DHLGH noted in their submission that the Department had reviewed the EIAR and are broadly in agreement with the findings in relation to Archaeology and Cultural Heritage as set out therein. The submission focused on heritage-related observations/recommendations and advised that the following should be included as a condition of any grant of permission:

1. All mitigation measures in relation to archaeology and cultural heritage as set out in Chapter 13 of the EIAR (February 2026) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.
2. A Project Archaeologist shall be appointed to oversee and advise on all aspects of the scheme from design, through inception to completion.
 - a. The Project Archaeologist shall liaise with the Department of Housing, Local Government & Heritage and the Planning Authority to agree in advance an overall strategy for archaeological works to be carried out both in advance of and in parallel with construction of the development.
 - b. This shall include the scope of any Archaeological Monitoring as well as any additional mitigation measures that may be required to protect archaeological heritage
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 (date February 2026) 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.
4. The planning authority and the Department of Housing, Local Government & Heritage 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.

Reason: To ensure the continued preservation (either in situ or by record) of places caves, sites, features or other objects of archaeological interest.

Response

The applicant notes the above recommendation by the DHLGH and would welcome inclusion of the same should ACP be minded to grant permission for the proposed development.

3.2 Transport Infrastructure Ireland

Transport Infrastructure Ireland (TII) acknowledges that the proposed development has the potential to contribute to the achievement of national renewable energy generation targets, the reduction of greenhouse gas emissions and the enhancement of resilience in energy supply. In this context, TII confirms that it welcomes and supports proposals which facilitate the transition to a low-carbon and climate-resilient economy, increase renewable energy generation and strengthen energy security, thereby giving effect to National Strategic Outcome No. 8 of the National Planning Framework, "Transition to a Low Carbon and Climate Resilient Society".

3.2.1 Abnormal and Exceptional Abnormal Loads

TII identified that the project would involve the transportation of abnormal and exceptional abnormal loads to the site as set out in the application documentation. It noted that, while the applicant has engaged in the permitting process and prepared an Exceptional Abnormal Load Report, the statutory process set out in Department of Transport Circular RW18 of 2024 should be fully completed. It further advised that the following alteration to the proposed condition wording set out in Section 2.3.6 of the Planning Statement should be made and included by the Commission in any decision to grant permission:

"Proposed Condition;

*'Prior to the first delivery of any abnormal or exceptional **abnormal** load associated with the development, the applicant shall submit to, and agree in writing, with the relevant the Roads Authority(s) an Abnormal Load **and Exceptional Abnormal Load** Management Plan. The Plan shall confirm the final haul route, pre- and post-delivery condition surveys of the public road network (including bridges and culverts where required), any necessary accommodation works, traffic management measures, and confirmation of statutory abnormal load permits and Garda escort arrangements. **Prior to the first delivery of any exceptional abnormal load, the permitting process required under Department of Transport Circular RW18 of 2024 ('Exceptional Abnormal Loads') shall be completed to the satisfaction of the planning authority.***

'The delivery of abnormal or exceptional loads may take place outside standard construction working hours where required under the statutory abnormal load permitting process and as agreed with the relevant Roads Authority(s).

'Reason: In the interests of road safety, protection of public infrastructure, and the orderly management of abnormal load movements'.

Response

The Applicant notes TII's comments in relation to the transportation of abnormal and exceptional abnormal loads and confirms that the statutory permitting process required under Department of Transport Circular RW18 of 2024 will be fully completed prior to the first delivery of any exceptional abnormal load associated with the Proposed Development.

The Applicant welcomes the inclusion of a condition as recommended by TII should ACP be minded to grant permission for the proposed development.

3.2.2 Management of the National Road Network

The submission emphasised the need for consultation with all relevant road authorities, PPP concessionaires and Motorway Maintenance and Renewal Contractors in relation to haul routes, delivery timetabling, temporary works, accommodation works and traffic management measures. It also noted that any works affecting the national road network should comply with the relevant standards, road safety audits, approvals and reinstatement requirements, in the interests of safeguarding the strategic function, safety and integrity of the national road network.

Response

The Applicant acknowledges the requirements outlined in relation to the management of the national road network, including the need for consultation with relevant road authorities, PPP concessionaires and maintenance contractors, and the requirement to comply with applicable standards, approvals, road safety audits and reinstatement procedures.

A comprehensive Exceptional Abnormal Load (EAL) Assessment has already been undertaken in accordance with the TII EAL Management Flow Chart and associated standards and can be found enclosed in Appendix 2.6, Volume 3 Appendices of the EIAR. This process identifies the required level of assessment based on the characteristics of the proposed loads and the infrastructure affected, and establishes the appropriate methodology for structural verification and route selection.

As part of this process:

- *Consultation has been undertaken with all relevant stakeholders, including TII, Iarnród Éireann, the PPP motorway operator and the relevant local authorities, to agree assessment standards and obtain the necessary structural information for the affected assets.*
- *As-built drawings and inspection records were obtained where available to inform the structural review and assessment of all relevant structures along the proposed route.*
- *Structural assessments have been carried out in accordance with applicable TII standards (AM-STR-06030, AM-STR-06048, DN-STR-03020) and Eurocode requirements, adopting a conservative approach where necessary.*

The EAL assessment concludes that the preferred haul route (Blue Route) is suitable for the transport of the proposed abnormal loads under controlled conditions, with all assessed structures demonstrating adequate capacity when assessed against the relevant design load criteria.

The assessment also defines the operational controls required to protect the integrity and safety of the network, including:

- *controlled vehicle speeds,*
- *use of designated lanes, and*
- *traffic management measures to restrict concurrent loading on structures during crossings.*

It is noted that engagement with the relevant authorities has already been initiated as part of the preliminary permitting process, and this will be continued through detailed design and pre-construction stages. All necessary approvals, including:

- *EAL permits,*
- *traffic management approvals,*
- *road safety audits, and*
- *any required agreements with PPP operators or maintenance contractors*

will be obtained in advance of works.

Based on the above, it is considered that the requirements of the Roads Authority in respect of the protection, safety and integrity of the national road network have been fully addressed through the completed EAL assessment and associated stakeholder engagement, with remaining matters appropriately managed through standard permitting and detailed design processes.

The Transport Assessment demonstrates that the predicted traffic associated with both the construction and operational phases can be accommodated without giving rise to unacceptable impacts on the safety, efficiency or carrying capacity of the national road network.

3.2.3 Grid Connection and HDD Motorway Crossings

TII acknowledged that the proposed development consists of the construction of a 220kV substation and grid connection cable route to the existing Cashla 220kV substation. The following observations were made for the consideration of the Commission in relation to the proposed grid connection as follows:

- The application involves proposed HDD motorway crossings. The submission stated that such crossings would require consent under Section 53 of the Roads Act, together with any other necessary licences, approvals or third-party access arrangements. The submission provides guidance on general requirements for directional drilling under a motorway and advised that consultation would be required with TII and any

other relevant parties e.g. PPP Companies, MMarC Contractors and local road authorities.

- TII referred the commission to Department of Transport Circular RW 07 of 2025 and the 'Interim Guidance to Road Authorities (placement of Medium or High Voltage electricity assets)' and the associated update issued with Circular RW 05 of 2026. In particular, the submission identified the need for engagement with the roads authority to determine the 'optimal solution' for grid connection routing.
- TII identified the proposals under the Gannow windfarm, case ref. PL07.500493 where it appears to utilise the same sections of local road in some instances. The submission noted that clarification may be necessary to demonstrate that the proposals can both be accommodated in the finite road space, where proposed grid connection routes interact and that opportunities to co-ordinate proposals in that regard, to ensure deliverability and to mitigate impact on the road network, may be available. The submissions also noted that the Gannow windfarm proposes only one HDD crossing of the motorway whereas the grid connection application proposes three, noting that there may be opportunities to optimise the impact on the strategic national road network.

Response

The Applicant acknowledges TII's comments regarding the proposed HDD motorway crossings. All required consents, licences, approvals and access arrangements, including consent under Section 53 of the Roads Act 1993 where applicable, will be obtained prior to commencement of any HDD works beneath the motorway network.

The detailed design and construction methodology will be developed in consultation with TII, the relevant PPP Company, MMarC Contractor, Galway County Council and any other relevant parties. The HDD works will be undertaken in accordance with applicable standards and requirements to ensure the safety and integrity of the motorway network.

AtkinsRéalis undertook early and sustained pre-application engagement with Galway County Council on behalf of the applicant in relation to the proposed Cashla Peaker Plant, with particular focus on the grid connection route, associated cable routing constraints, joint bay locations, and interface with the local road network. AtkinsRéalis prepared and circulated agendas, a roadmap of actions and deliverables, supporting presentation material, meeting minutes, traffic management information, and relevant technical inputs to facilitate informed discussion with Galway County Council and other stakeholders. This engagement helped clarify the Council's expected role, the information required to support review of the proposed route, and the follow-on actions needed to progress the grid connection and abnormal load interfaces in a structured manner. A summary of the consultation is provided in section 1.10 of the Chapter 1 Introduction, Volume 2 of the EIAR and details of the alternative grid connection routes assessed are presented in Chapter 3 Reasonable Alternatives, Volume 3 of

the EIAR. The alternative routes were assessed using a multicriteria analysis (MCA) for 7 no. potential grid route options in accordance with the EirGrid 2021 Multi-Criteria Analysis Guidelines. The current route option presents the optimal routing identified in accordance with the 'Interim Guidance to Road Authorities (placement of Medium or High Voltage electricity assets)'.

The Applicant acknowledges TII's observations regarding the proposed Gannow Wind Farm grid connection. The potential cumulative interaction between the two proposals has been assessed in Chapter 16 (Cumulative Impacts) of the EIAR, including the shared sections of the local road network. The assessment considers the potential effects should both developments proceed concurrently and concludes that the principal cumulative impact would arise during construction, with mitigation provided through phased construction programming, implementation of the Construction Traffic Management Plan and appropriate diversion signage.

The Applicant notes that the Gannow Wind Farm proposal is the subject of a separate planning application and that its detailed design, implementation and programme are matters for its promoter. The Applicant therefore does not consider it appropriate to comment on the deliverability of that proposal.

For completeness, it is noted that, at the time of preparing the EIAR, no Grid Connection Agreement or connection offer was in place for the proposed Gannow Wind Farm connection to Cashla Substation, whereas the Proposed Development has secured a grid connection offer through the relevant EirGrid process. Nevertheless, the cumulative assessment has conservatively assumed that both projects could proceed concurrently and has evaluated the resulting cumulative effects accordingly.

Chapter 16 concluded that, assuming that the Gannow windfarm project proceeds and the construction phases overlap, the Proposed Project and the Gannow Windfarm will result in short-term, significant impacts on the local road network, specifically along L-7108 and L-7109, due to full road closures during grid connection works. Comprehensive traffic management plans, phased construction scheduling, and clear diversion signage are proposed as detailed in the CTMP presented in Appendix 2-11, Volume 3 of the EIAR. As set out in section 4.6.5 of this response, the CTMP explicitly provides that continuous access to all properties, farms and businesses will be maintained throughout the construction phase. No other significant impacts are anticipated for the Proposed Project during any other phase.

Maintaining appropriate separation distances from existing underground services is standard engineering practice and will be implemented in accordance with the requirements of the relevant utility owners and applicable standards. Where localised service congestion or other site-specific constraints are encountered, the relevant utility or service provider will be consulted to agree an appropriate and practicable separation distance.

In the case of maintaining electrical clearances, the horizontal separation between cable circuits will maintain thermal interdependence and prevent mutual heating effects, overheating and derating of the circuits, in compliance with EirGrid requirements. In general, for parallel runs of cables, a separation of 2

meters from other HV networks can proceed as normal without causing this de-rating effect.

The proposed alignments diverge in the vicinity of the motorway crossings due to the different engineering, environmental, land access, and land ownership constraints applicable to each project. Consequently, a common HDD crossing solution has not been incorporated into the design of the Proposed Development.

3.2.4 Motorway Reservation

TII requested clarification that any permission granted would not extend to works within the M6, M17 or M18 motorway reservations. It stated that, based on the information submitted, the proposed development can be carried out outside the motorway reservation and requested that this be expressly reflected in any decision with the following condition:

“Proposed Condition;

This permission does not approve nor imply consent for any works within the M6, M17 and M18 Motorway Reservations.

Reason; In the interests of clarity as to the construction of this permission and to safeguard the strategic function and maintain levels of safety on the national road motorway network in accordance with National Strategic Outcome no. 2 of the National Planning Framework, RPO 6.5 of the Northern and Western Regional Assembly Regional Spatial and Economic Strategy and Policy Objective NR 1 of the Galway County Development Plan, 2022 – 2028.”

Response

TII’s observation is noted and the applicant welcomes the inclusion of a similarly worded condition with one amendment as per below in red:

“Proposed Condition;

*This permission does not approve nor imply consent for any works within the M6, M17 and M18 Motorway Reservations **without the prior written agreement of TII.***

Reason; In the interests of clarity as to the construction of this permission and to safeguard the strategic function and maintain levels of safety on the national road motorway network in accordance with National Strategic Outcome no. 2 of the National Planning Framework, RPO 6.5 of the Northern and Western Regional Assembly Regional Spatial and Economic Strategy and Policy Objective NR 1 of the Galway County Development Plan, 2022 – 2028.”

In requesting this amendment, the applicant wishes to draw the Commission’s attention to the definition of works as set out in both the Planning and Development Act, 2000 (as amended)[PDA 2000] and the Planning and Development Act, 2024 (as amended)[PDA 2024]:

PDA 2000 -

*“works” includes any **act or operation of construction**, excavation, demolition, extension, alteration, repair or renewal and, in relation to a protected structure or proposed protected structure, includes any act or operation involving the application or removal of plaster, paint, wallpaper, tiles or other material to or from the surfaces of the interior or exterior of a structure.” [emphasis added]*

PDA 2024

*“works” includes **an act or operation—***

*(a) **of construction**, excavation, demolition, extension, alteration, repair or renewal (including in relation to a protected structure, a proposed protected structure or a structure situated in an architectural conservation area), on, in, over or under land or a maritime site,.... [emphasis added]*

In this regard, the applicant notes that the final haul route, which can be considered an operation of construction, will be agreed in writing with relevant Roads Authority(s) as part of an Abnormal Load and Exceptional Abnormal Load Management Plan prior to the first delivery to the site and will comply with the requirements of the Exceptional Abnormal Load permitting process under Department of Transport Circular RW18 of 2024 (‘Exceptional Abnormal Loads’).

As such, the amended wording is proposed to ensure the applicant’s ability to adhere to the requirements of a separate permitting process is not prejudiced by a restrictive planning condition.

3.2.5 External Lighting

The submission also identified the potential for external lighting associated with the proposed development to affect road safety on the adjoining motorway network through glare, overspill or distraction. It therefore recommended that all external lighting be designed, installed and maintained so as to avoid adverse effects on road users, with details to be agreed prior to commencement by way of the following planning condition:

“Proposed Condition;

All external lighting shall be designed, installed and maintained to ensure no incidence of glare, overspill or potential distraction to road users on the adjoining motorway network. Lighting shall be directed and cowled, where warranted, and all external lighting details shall be agreed with the planning authority prior to commencement of development. Agreement with the planning authority shall provide for monitoring and subsequent modification or amendment to external lighting where glare, overspill or potential distraction to road users arises.

Reason; In the interests of safeguarding the strategic function and maintaining levels of safety on the national road motorway network in accordance with National Strategic Outcome no. 2 of the National Planning Framework, RPO 6.5 of the Northern and Western Regional Assembly Regional Spatial and Economic Strategy and Policy

Objective NR 1 of the Galway County Development Plan, 2022 – 2028.”

Response

External lighting has been designed to provide the minimum illumination necessary for operational and safety purposes while avoiding unnecessary light spill beyond the site. This approach also assists in reducing potential impacts on nearby ecological receptors and road users.

The TII observation in relation to external lighting is noted and agreed. The final detailed lighting design will take full account of potential glare, light spill and overspill, and will be developed to ensure that the proposed lighting does not adversely affect the adjacent motorway network or road users on the surrounding local road network.

The lighting design will incorporate appropriate directional fittings and mitigation measures to control light distribution and minimise obtrusive light. As demonstrated in the submitted AGI Lighting Report, the design has been developed using appropriate modelling and assessment of illuminance, luminance and glare. Reference is made to the previously submitted Lighting Report EIAR Appendix 2 Part 8.

Detailed lighting specifications, including lux levels and final layout/design parameters, will be submitted to the Planning Authority for agreement prior to commencement of development. The proposed condition, including provisions for monitoring and modification where required, is therefore accepted.

3.2.6 Greenway and Active Travel Considerations

Finally, TII recommended consultation with Galway County Council in relation to any greenway or active travel proposals in the vicinity of the proposed works.

Response

Consultation with GCC was undertaken and no greenways/active travel proposals were identified in the area.

3.3 Uisce Éireann

3.3.1 Water and Wastewater Services

Uisce Éireann notes that the proposed 220kV substation includes human welfare facilities and that a water connection to serve these facilities was deemed viable under a pre-connection enquiry (CDS2500094). The submission states that the connection can be facilitated without the need for upgrades to the Uisce Éireann water network. Wastewater servicing requirements are proposed to be met by an on-site private treatment system.

Response

It is acknowledged that a water connection to serve the human welfare facilities within the proposed 220kV substation has been deemed feasible under Pre-Connection Enquiry Reference CDS2500094 and that the connection can be

accommodated without the need for upgrades to the existing public water network. The Applicant will continue to engage with Uisce Éireann throughout the detailed design process and will enter into all required connection agreements prior to commencement of development, as appropriate.

With respect to wastewater, the proposed 220kV substation will not be served by an independent on-site wastewater treatment system. Foul wastewater arising from the substation welfare facilities will instead be conveyed to the wastewater treatment infrastructure being provided as part of the separately submitted Cashla Peaker Plant development application. The current application therefore does not include a standalone wastewater treatment plant, septic tank, polishing filter or percolation area associated with the substation.

The wastewater treatment infrastructure proposed as part of the wider Cashla Peaker Plant development has been assessed separately under that application and will be designed and operated in accordance with all relevant EPA guidance, applicable standards and planning authority requirements.

Given the limited nature of wastewater generation associated with the substation welfare facilities and the provision of treatment infrastructure within the adjacent Peaker Plant development, the Applicant is satisfied that a robust and sustainable wastewater servicing strategy is available for the proposed development.

Accordingly, it is considered that the proposed water supply and wastewater arrangements represent a satisfactory servicing strategy for the development and will not give rise to significant impacts on public water services infrastructure or the receiving environment.

3.3.2 Public Infrastructure and Diversions

Uisce Éireann identifies the presence of significant in-situ network infrastructure assets along the proposed grid connection route to Cashla Substation, with potential for adverse interaction at a number of locations. The submission confirms that the applicant has engaged with Uisce Éireann's diversions team and that a Diversions Agreement (DIV25311) has been reached, which Uisce Éireann states resolves potential impacts to its satisfaction.

Response

It is acknowledged that Uisce Éireann has identified existing public water and wastewater infrastructure assets within the vicinity of the proposed underground cable route and that engagement has been undertaken with Uisce Éireann's Diversions Team to assess and address any potential interactions with these assets.

The Applicant further notes Uisce Éireann's confirmation that a Diversions Agreement (Reference DIV25311) has been agreed between the parties and that the proposed arrangements satisfactorily address the potential impacts on Uisce Éireann infrastructure. The Applicant welcomes this confirmation and acknowledges that the agreed diversion and protection measures will ensure the continued operation, maintenance and integrity of the public water services network during both the construction and operational phases of the development.

All works in the vicinity of existing Uisce Éireann infrastructure will be undertaken in accordance with the requirements of the Diversions Agreement, Uisce Éireann standards and specifications, and any associated permit or approval requirements. Detailed design and construction methodologies will continue to be coordinated with Uisce Éireann to ensure the protection of existing assets and to avoid interruption to public water and wastewater services.

Accordingly, it is considered that the potential interaction between the proposed development and existing Uisce Éireann infrastructure has been satisfactorily addressed, and no significant effects on public water services infrastructure are anticipated as a result of the proposed development.

3.3.3 Public Water Supply and Source Protection

Uisce Éireann states that it is its policy to maintain safe and secure drinking water supplies and to ensure that development does not give rise to any deterioration in water quality. The submission notes that the proposed development is located within the abstraction catchment for the Tuam Regional Water Supply. However, Uisce Éireann acknowledges the findings of the EIAR, which conclude that no surface water features were identified within the study area and that there will be no hydrological connection from the development to any Uisce Éireann water sources. Uisce Éireann also notes the mitigation measures set out in the EIAR and Construction Environmental Management Plan for the protection of surface water and groundwater.

Response

The Applicant acknowledges Uisce Éireann's statutory responsibility to safeguard drinking water quality and to ensure that new development does not adversely affect existing or future public water supplies.

It is noted that the proposed development is located within the abstraction catchment of the Tuam Regional Water Supply. However, Uisce Éireann has acknowledged the findings of the Environmental Impact Assessment Report (EIAR), which conclude that no surface water features occur within the study area and that there is no hydrological connection between the proposed development and any Uisce Éireann drinking water source.

The Applicant further notes Uisce Éireann's acknowledgement of the comprehensive mitigation measures incorporated into the project design and set out within the EIAR and CEMP. These measures have been specifically developed to protect groundwater and surface water resources during the construction, and operational phases of the development. They include robust pollution prevention controls, appropriate storage and handling procedures for fuels and hazardous materials, engineered drainage systems, and emergency response measures designed to prevent any adverse effects on the receiving water environment.

Having regard to the site-specific hydrogeological assessment undertaken, the absence of any identified hydrological pathway to public water supply sources, and the implementation of the proposed mitigation measures, it is considered that the development will not adversely affect public drinking water sources, groundwater quality, or surface water quality.

Accordingly, the Applicant considers that the proposed development is consistent with the objectives of protecting public water supplies and maintaining water quality, and agrees to continue engagement with Uisce Éireann during detailed design and construction to ensure all relevant requirements are fully implemented.

3.3.4 Recommended Conditions

To ensure adequate provision and protection of water and wastewater facilities, Uisce Eireann recommends that permission be granted on the following conditions:

1. The applicant shall ensure there is no deterioration in ground water quality because of any pre-construction works and/or the operation of and/or the decommissioning of the development as proposed.
2. The applicant shall ensure compliance with the proposed mitigation measures outlined in the EIAR, to ensure protection of any Uisce Eireann abstraction sources and ensure that these measures be fully complied with as a condition of grant during the pre-construction, operational and decommissioning phases of the development to ensure that there will be no negative impact to any of UE's Assets and / or infrastructure which may be in proximity to the development.
3. That the applicant shall adhere to the terms of any agreements with Uisce Eireann.

Reason: To protect existing public infrastructure and public water sources

Response

The applicant welcomes these recommended conditions and will ensure full compliance with them.

4. Response to Public Submissions

This section summarises the key issues raised in the third-party submissions received in respect of the proposed development. Given the number of submissions received and the extent of overlap between the matters raised, the issues are addressed thematically rather than on a submission-by-submission basis.

Where non-statutory third-party submissions refer to or rely on commentary made by prescribed bodies, it is requested that full regard is had to the relevant prescribed body submissions and the Applicant's responses thereto, as set out in Section 3 of this report. This ensures that such matters are considered in their full context.

4.1 Project Scope, Cumulative Assessment and Alternatives

Summary

A recurring theme in the submissions relates to the scope of the current application and its relationship with the wider Cashla energy infrastructure proposals, including the separate Cashla Peaker Plant and associated gas infrastructure. Submissions refer to the functional relationship between these elements and raise questions regarding the approach to cumulative assessment across the relevant consent processes. Matters identified include cumulative construction traffic, road closures, emissions, groundwater, biodiversity, residential amenity and interaction with other infrastructure proposals, including the Gannow Wind Farm grid connection. A number of submissions also refer to the consideration of alternatives, including alternative site locations, alternative grid connection routes and alternative energy technologies.

Response

The Applicant notes the concerns raised regarding the use of separate statutory consent processes for the wider Cashla Peaker Plant Project. The current application relates specifically to electricity transmission infrastructure, comprising the proposed 220kV substation and underground 220kV grid connection to the existing Cashla 220kV Substation, and has been submitted pursuant to Section 182A of the Planning and Development Act 2000, as amended.

The proposed Cashla Peaker Plant is the subject of a separate Strategic Infrastructure Development application under Section 37E of the Planning and Development Act 2000, as amended (Case Ref. ACP-324113-26). The proposed gas connection to the national gas grid will also be subject to a separate consent process to the CRU under Section 39A of the Gas Act 1976, as amended. The use of separate consent processes reflects the applicable statutory framework for each element of the wider project.

Prior to lodgement of the current application, the Applicant entered into pre-application consultation with An Coimisiún Pleanála under Section 182E (Case Ref: ACP-323874-25). The Commission issued its opinion on 9th February 2026

confirming that the proposed 220kV substation and grid connection fall within the scope of Section 182A and that an application should be made directly to the Commission.

While the project components are subject to separate statutory consent processes, the Applicant recognises their functional relationship. Accordingly, the wider Cashla Peaker Plant Project has been considered in the EIAR and NIS submitted with this application, including cumulative and in-combination effects where relevant. Matters including traffic, noise, air quality, biodiversity, water, landscape and cumulative effects are addressed in those supporting assessments.

On this basis, the Applicant considers that the scope of the current application is clear and appropriately grounded in the statutory provisions for electricity transmission infrastructure. The Cashla Peaker Plant and gas connection will be determined under their respective consent processes, while the environmental interrelationship between the project components has been assessed through the EIAR and NIS submitted with this application.

A range of reasonable alternatives was considered during the design and assessment of the Proposed Project, which are presented in Chapter 3, Volume 2 of the EIAR. The consideration of alternatives focused on options that were technically feasible, realistic, and capable of delivering the required level of electricity generation and grid support. Environmental considerations were a key factor throughout the process and played an important role in shaping the final design. A number of broad areas east of Galway City were examined where suitable gas and electricity infrastructure exists. Within these areas, several potential site locations were identified and assessed against environmental, planning, engineering, and availability constraints. Following this assessment, the selected site near Athenry was identified as the most suitable option. The Proposed Project site location was the best performing site option, due to the intersection of the existing gas transmission lines and electricity grid infrastructure, land availability and lack of significant environmental constraints.

Different operational lifespans were considered for the Proposed Project. A time-limited operational life up to 31 December 2050 was selected for the Cashla Peaker Plant (Case Ref: ACP-324113-26) to ensure consistency with national climate policy and Ireland's statutory commitment to achieving net-zero greenhouse gas emissions by 2050. This approach also allows flexibility for future changes in technology, policy, and energy demand. The proposed 220kV substation and 220kV grid connection subject of this planning application (Case Ref: ACP-324162-26) will become Eirgrid Assets once operational and will not be decommissioned. Alternative plant capacities were examined. The selected capacity reflects the requirements set by the national electricity grid operator to support the grid during periods of high demand or low renewable output. Different generation technologies were assessed (i.e. open-cycle versus combined cycle). The project will use an open-cycle gas turbine, which was selected because it can start up quickly and respond rapidly to changes in electricity demand.

The use of natural gas (via. existing network and a proposed minor extension that will subject to a S39A consent) for the Cashla Peaker Plant is proposed as the primary fuel. This option avoids the need for large on-site fuel storage and is

compatible with the existing energy infrastructure. The plant is designed to accommodate future changes to lower-carbon gases, in line with national plans for gas network decarbonisation.

A secondary fuel supply is required under electricity grid code rules to ensure the plant can operate during rare situations when gas is unavailable. Two main options were considered and assessed:

- *Hydrotreated Vegetable Oil (HVO)*
- *Low sulphur diesel.*

Low sulphur diesel was selected as the secondary fuel because it is widely available, fully compatible with available turbine technology, and meets national grid requirements for emergency operation. Its use is expected to be very infrequent and limited to exceptional circumstances. The development is designed to remain fuel flexible within the parameters of the assessed scheme, allowing for the future substitution of lower-carbon fuels.

Alternative grid connection options were examined, including different substations, connection technologies, and route corridors. The 220kV Cashla Substation was selected based on its proximity, available capacity, and compatibility with the gas supply network.

The assessment of reasonable alternatives demonstrates that the Proposed Project has been shaped by a careful and iterative design process that integrates environmental considerations with technical and policy requirements. The selected options for site location, plant design, technology, grid connection, fuel use, and transport represent the most appropriate and balanced solutions available. The selected design meets the project's objectives while avoiding or minimising potential environmental effects wherever practicable.

4.2 Roads, Traffic, Access and Construction Disruption

Summary

The principal issue raised in the public submissions relates to the potential effects of construction activity on the local road network and on access to residential, agricultural, educational, childcare, commercial and community receptors. Submissions identify concerns regarding the duration and extent of temporary road closures, stop/go traffic management, diversion arrangements, construction traffic movements, HGV activity, abnormal load movements, road opening works, joint bay construction, cable installation, road reinstatement and the capacity of the existing rural road network to accommodate the proposed works. Matters raised also include the suitability of local roads for construction traffic, the adequacy of the traffic surveys carried out, the adequacy of diversion routes, potential congestion on alternative routes and the need for clear construction phasing and advance communication with affected road users.

Access-related matters raised include access to dwellings, the location of joint bays at private entrances, family homes, schools, childcare facilities, farms, agricultural lands, rural businesses, local services and community infrastructure during construction. Particular issues referenced include

access to Lisheenkyle National School and childcare facilities, school bus movements, drop-off and collection arrangements, commuting routes, access to Athenry, Galway and surrounding services, farm machinery movements, milk collection, feed deliveries, veterinary access, contractor access, business deliveries, staff commuting and customer or client access. A number of submissions also identify concerns regarding emergency access, including ambulance and fire service access, community defibrillator access, access to elderly or medically vulnerable residents and potential effects on emergency response times during periods of temporary traffic management or road closure.

Response

The concerns raised in relation to roads, traffic, access and construction disruption are acknowledged. The Applicant recognises that the construction of the proposed grid connection will require works within the public road network, including trench excavation, cable installation, joint bay construction, reinstatement works and associated traffic management measures. These matters have been comprehensively assessed within the EIAR and supporting Construction Traffic Management Plan (CTMP) enclosed in Volume 3, Appendix 2 - 11.

The assessment confirms that construction impacts will be temporary in nature and that a range of mitigation measures will be implemented to minimise disruption to local communities, road users, businesses and agricultural activities. Construction activities will be carefully planned, phased and managed in consultation with Galway County Council, TII, emergency services and including local stakeholders supported via a community liaison officer. The CTMP will provide detailed arrangements for traffic routing, temporary traffic management, road closures, diversions, stakeholder communications and maintenance of local access throughout the construction period.

Regarding concerns on the suitability and capacity of the local road network, comprehensive traffic assessments, pavement assessments and abnormal load assessments have been undertaken. A detailed traffic assessment has been provided in EIAR Chapter 10 (Traffic and Transport). While the development does not meet the threshold criteria for a full Traffic and Transport Assessment (TTA), the submitted assessment adequately considers construction and operational traffic impacts (Traffic and Transport Assessment Guidelines, TII). The traffic assessment was undertaken utilising an automatic traffic count (ATC) on the L3103 which was conducted on Wednesday the 12th February 2025. The primary reason for the traffic count was to determine vehicle speeds on the road for the purposes of sight distances at the proposed access. No further traffic counts were undertaken because of the proposed development not meeting the threshold for a full TTA (on the basis that there is no operational impact on the surrounding road network). Given that the cable installation is not anticipated to coincide with the peak construction activities (deemed to be "Not Significant"), the traffic associated with the cable construction (cable-drum deliveries, trenching plant movements, excavator movements, HDD rig movements, resurfacing vehicles, reinstatement-material deliveries) are anticipated to be negligible. Further to this,

the impacts are only anticipated to impact on the R3103 as the L7108 and L7109 are expected to be under "local access only" conditions.

The assessments concluded that the existing road network can accommodate the proposed construction traffic, abnormal load movements subject to the implementation of the proposed traffic management measures and operational controls as set out in Section 10.6 of the EIAR. Dedicated assessments of haul routes, bridge structures and pavement condition informed the development of the proposed construction strategy and route selection process.

The Applicant acknowledges concerns regarding temporary road closures, stop/go systems, diversion routes and potential congestion on alternative routes. The conservative estimate for closure is anticipated to be 1 month on the L3103, 3 months on the L7108 and 2 months on the L7109. To minimise the impacts of these closures, closure segments are minimised to 30m and will allow local access on either side of the closure section. This will only impact through-traffic who will be required to take a detour of an additional approx. 4km.

The Applicant further acknowledges concerns regarding access to dwellings, farms, schools, childcare facilities, businesses and community services. Maintaining access to these receptors is a key requirement of the construction strategy. Continuous access to residences, farms, agricultural lands, businesses and community facilities will be maintained throughout the construction phase as committed to in the CTMP. Where works are required adjacent to entrances or access points, these will be managed on a case-by-case basis through phased construction, temporary access arrangements, plated crossings or short-term reinstatement measures as necessary.

Specific concerns relating to Lisheenkyle National School, childcare facilities, school transport services, drop-off and collection activities and general commuter traffic are recognised. Construction traffic management measures will include restrictions on construction traffic movements during peak travel periods where practicable, together with ongoing liaison with affected stakeholders to minimise potential disruption. As set out in the CTMP, Heavy Vehicles traffic will be restricted to 9am – 4pm on weekdays and 9am – 2pm on Saturdays. As set out in the CEMP, Deliveries will be scheduled to avoid morning and evening peak hours. This will avoid HGV traffic arriving during the morning peak hours and creating conflict with local residents' commute or school run. Construction personnel will be encouraged to car-pool, or to travel to site in minibuses. Abnormal loads are expected to occur in the afternoon, outside peak periods. Traffic management arrangements will be reviewed and adjusted as required in agreement with Galway County Council throughout the construction phase to respond to local conditions and stakeholder feedback. Exceptional Abnormal Loads (EAL) will be subject arrangements with relevant statutory authorities under an EAL licence, including an Garda Síochána.

The Applicant also recognises the importance of maintaining access for agricultural operations. Farm entrances, livestock movements, milk collection, feed deliveries, veterinary access and agricultural contractor access will be accommodated throughout the construction period. Engagement will be undertaken with affected landowners and occupiers in advance of works to

identify specific requirements and to ensure that construction sequencing and traffic management arrangements take account of seasonal farming activities and operational needs.

Concerns regarding emergency access are similarly acknowledged. The CTMP provides that access for emergency services, including ambulances, fire services and An Garda Síochána, will be maintained at all times during construction. Construction traffic management arrangements will include procedures for the immediate facilitation of emergency vehicles where required, including temporary suspension of works and removal of traffic management controls where necessary. Engagement will be undertaken with relevant emergency service providers during detailed planning of the works to ensure emergency access requirements are fully incorporated into the construction arrangements. Specific emergency access procedures are outlined in Section 10.5.2.4 of the EIAR.

The Applicant further acknowledges the need for clear communication with local communities and road users. Advance notice of road works, traffic management measures, road closures and diversion arrangements will be provided to affected residents, businesses, schools, transport operators, emergency services and other stakeholders. Appropriate communication channels and contact arrangements will be established to facilitate ongoing engagement throughout the construction phase

Accordingly, having regard to the assessments undertaken, the mitigation measures proposed, the commitments contained within the CTMP and CEMP, and the ongoing stakeholder engagement process, the Applicant considers that the potential impacts on roads, traffic, access and community connectivity will be effectively managed and mitigated. The proposed development will not result in significant adverse effects on the operation of the local road network, access to residences, farms, schools, businesses, community facilities or emergency services.

4.3 Public Health, Air Quality and Emissions

Summary

A number of submissions refer to public health, air quality and emissions, particularly in relation to the wider Cashla Peaker Plant, which is the subject of a separate Section 37E application. Issues raised include operational emissions, construction dust, traffic emissions, diesel use, nitrogen oxides, particulate matter, respiratory health and potential effects on children, older persons and medically vulnerable residents.

Response

The Applicant recognises that concerns regarding human health are of particular importance to nearby communities. These matters have been assessed using recognised assessment methodologies. A response to concerns raised regarding Electromagnet Fields (EMF) can be found under section 4.12 below.

There will be no operational air emissions associated with the proposed substation and grid connection. It is also noted that the proposed development will form a permanent part of the national grid under the control of EirGrid.

With regard to the effects of construction dust on sensitive receptors, these have been assessed in Chapter 7 Air Quality Volume 2 of the EIAR and appropriate dust control and mitigation measures were identified. The proposed development will not have a significant effect on air quality, subject to the implementation of the identified mitigation measures. These are also shown in Chapter 18 Schedule of Environmental Commitments, Volume 2 of the EIAR, and will be fully implemented as relevant throughout the project. Monitoring of construction dust deposition along the site boundary to nearby sensitive receptors during the construction phase of the Proposed Project will be carried out to ensure mitigation measures are working satisfactorily.

4.4 Noise and Vibration

Summary

Submissions refer to potential noise and vibration effects associated primarily with the construction phase of the proposed 220kV substation and underground grid connection works. Matters raised include construction noise from excavation, trenching, plant movements, HGV traffic, joint bay construction, cable installation and potential rock breaking along sections of the proposed route. A number of submissions refer to the presence of limestone or karst ground conditions and seek clarification on the construction methodology, the likely requirement for rock breaking, the duration of noisy activities and the proximity of such works to dwellings, farm buildings, boundary walls, older structures and other property features.

Concerns are also raised regarding vibration and the potential for construction works to affect the structural condition of nearby properties, including dwellings, entrance pillars, stone walls, farm structures and buildings located close to the public road corridor. Submissions request that pre-construction condition surveys, vibration monitoring and appropriate procedures for responding to any reported damage be considered as part of construction-stage management. Some submissions also identify potential disturbance to residents, children, schools, livestock and agricultural operations arising from construction noise, vibration, dust and traffic-related activity.

Further matters raised include the adequacy of baseline noise information and a requirement for a standalone noise assessment, the need for clear construction working hours, temporary mitigation measures, monitoring arrangements and communication with affected receptors during particularly noisy or vibration-generating works.

Response

Construction Noise Impacts Along Grid Connection

Chapter 9 of Volume 2 of the EIAR presents an assessment of potential noise impacts associated with the construction of the proposed grid connection route which consider excavation, trenching, plant movements, cable installation and potential rock breaking. The assessment notes "The associated construction works will occur for short durations (rolling construction method, approximately 30 – 50 m per day) at varying distances from NSLs. As the underground electrical

cable route is approximately 8km in length, it will take an estimated 9 months to construct the full length of the route. Review of the underground electrical cable route has identified that the nearest NSLs, are at distances of the order of 10 to 30m”.

A range of construction noise levels have been calculated and presented in Table 9.17 of the EIAR for varying distances from the works, representing the closest noise sensitive locations along the 8km length of the underground cable. The assessment concludes:

“The predicted construction phase noise levels at the closest NSLs, at distances of 40m and greater from works, are within the construction noise criterion of 70 dB $L_{Aeq,12hr}$ set out in Section **Error! Reference source not found..** At shorter distances this criterion is exceeded; this would indicate a potential significant effect. However, taking into account that the proposed underground electrical cabling works will be undertaken in a rolling construction method with 30 –50 m of road constructed and back filled each day, the works close to any individual NSL will last for less than one day, after which the works are at greater distance from the NSL and therefore construction noise levels will be lower. With reference to the time periods in Section 9.5.3.3.4 it is not considered that a significant noise effect is associated with the construction of this element of the proposed works. The overall potential impact is negative, not significant and temporary”.

The time periods referred to in Section 9.5.3.3.4 relates to those taken from the DMRB Noise and Vibration (UKHE 2020) document, which recommends that construction noise and construction traffic noise impacts shall constitute a significant effect where it is determined that a major or moderate magnitude of impact will occur for a duration exceeding:

- Ten or more days or night in any 15 consecutive day or nights; and
- A total number of days exceeding 40 in any six consecutive months

As discussed with Chapter 9, the periods during which highest noise levels will be experienced outside any one NSL will be significantly lower than the time periods discussed above.

Impacts at residential dwellings and schools along the length of the proposed underground cable will therefore not be exposed to significant noise effects for prolonged periods and will not results in an overall significant effect due to the linear nature of the works.

Construction Vibration Impacts Along Grid Connection

A number of submissions raise concern over potential for vibration impacts associated with the construction of the Proposed Development. The potential vibration impacts of the underground cable connection has been assessed within Chapter 9, Volume 2 of the EIAR.

The assessment notes: “In terms of construction vibration, it is anticipated that excavations will be made using standard excavation machinery, which do not generate appreciable levels of vibration close to the source. There will be intermittent periods during which breaking of the existing road surface is required to excavate the cable trench. The depth of excavations is shallow (typically less than 2m in depth) and are highly unlikely to require rock breaking below the road

surface. Notwithstanding, the use of breakers mounted on excavators used for road surface breaking and breaking of rock (where required) generate vibration levels less than 1mm / s at distances of 10m from the activity." These vibration levels are orders of magnitude below those associated with any form of cosmetic damage for light framed buildings and structures or for more vulnerable or protected structures as set out within Table 9.4 of Volume 2 of the EIAR. There is therefore no potential for any form of structural damage as a result of the proposed underground cable route construction.

The intermittent periods during which any breaking would occur in the vicinity of residential or educational buildings will also ensure the potential vibration impact to building occupants will not be significant.

Procedures for reporting any potential damage

The CEMP submitted as part of this planning application sets out the procedures for reporting of any incidents, such as any potential damage to existing infrastructure, and corrective actions during the construction stage. The CEMP also sets out the procedure for responding to emergency situations, to prevent and mitigate any potential adverse environmental impacts.

Baseline noise levels

Commentary has been made relating to the absence of baseline noise data along the underground cable route. The assessment has set a fixed construction noise threshold relating to the grid connection cable. This is set in line with the documents outlined in Chapter 9 of the EIAR which is set for areas set back from main road traffic and industrial noise sources.

The construction noise calculations are based on the various items of construction plant and hence, the baseline noise environment does not feed into the construction noise assessment. Survey data along the route is therefore not required for the noise assessment of this element of project.

Standalone Noise Assessment

Chapter 9 of Volume 2 of the EIAR considers the potential noise impacts associated with both the proposed Peaking plant and the cable grid connection. This has been prepared to avoid separating out both elements and to ensure any potential cumulative effects are assessed. The construction phase of both elements are assessed in the EIAR. The assessment is robust and fulfils all requirements for understanding the potential impacts of both projects individually and cumulatively.

Construction Working Hours

The construction working hours proposed for the project are set out within the CEMP and Planning Statement that accompanies the planning application, construction works for the proposed development are expected to take place between 07h00 and 18h00 (Monday to Friday – Substation and Grid Connection) and between 07h00 and 14h00 (Saturdays – Substation only). No works are expected to take place outside these hours or on Sundays or Bank Holidays. On certain occasions, work may need to be undertaken outside of the typical working day to expedite progress, meet critical milestones, or address unforeseen

circumstances that could impact the programme; however all such works would only be carried out following prior consultation with Galway County Council.

4.5 Water and Groundwater

Summary

A number of submissions refer to water, groundwater and hydrogeological matters, with particular reference to karst limestone conditions in the wider area. Issues raised include the potential for excavation, trenching, joint bay construction, dewatering, road opening works and construction traffic to disturb groundwater flowpaths, affect drainage patterns or increase the risk of sediment, fuel, concrete washout or other contaminants entering groundwater or surface water pathways. Submissions also refer to potential hydrological or hydrogeological connectivity to European Sites, including through groundwater, drainage or surface water pathways, and seek assurance that such pathways have been appropriately considered in the EIAR and NIS. Submissions also refer to potential effects on private wells, livestock water supplies, farm drainage, roadside drains, water mains, service pipes and the Lisheenkyle Group Water Scheme. Matters raised include the need for detailed mapping of existing water infrastructure, protection of group water scheme and Uisce Éireann assets, avoidance of service interruption, restoration of any affected services, monitoring of water quality and groundwater conditions, consultation with affected landowners and water supply interests, and safeguards to ensure that construction-stage works do not result in deterioration of groundwater quality or interference with existing water supplies.

Response

The concerns raised in relation to water resources, groundwater protection and hydrogeological conditions are noted. The proposed development has been subject to a comprehensive assessment of potential impacts on surface water, groundwater and sensitive hydrogeological receptors, including consideration of the underlying karst limestone geology and the potential for hydrological and hydrogeological connectivity to downstream receptors and designated sites. The findings of these assessments are presented within the EIAR and Natura Impact Statement (NIS).

The Applicant acknowledges that construction activities associated with the development, including trench excavation, joint bay construction, road crossings, dewatering (where required), road opening works and construction traffic, have the potential to interact with the receiving groundwater environment if not appropriately managed. Accordingly, the project has been designed to incorporate a comprehensive suite of mitigation measures and environmental controls to protect both groundwater and surface water resources throughout the construction phase. These include construction-stage pollution prevention measures, controls on fuel and chemical storage, management of concrete and grout works, emergency spill response procedures, sediment control measures, and environmental monitoring requirements.

The hydrogeological assessment undertaken for the project confirms that groundwater flow conditions, potential karst features and groundwater vulnerability have been considered in the design and assessment process. Where excavations encounter groundwater, appropriate construction methodologies and environmental controls will be implemented to prevent deterioration of groundwater quality or adverse effects on groundwater flow regimes. All construction works will be undertaken in accordance with the CEMP and relevant best practice guidance for working within sensitive groundwater environments.

In relation to European Sites, the NIS specifically considered potential hydrological and hydrogeological pathways, including groundwater connectivity associated with the underlying karst geology. The assessment concluded that, having regard to the characteristics of the site, the absence of direct surface water pathways, the distance to designated sites, and the implementation of the proposed mitigation measures, the development will not adversely affect the integrity of any European Site, either alone or in combination with other plans or projects.

The Applicant also acknowledges the importance of protecting existing water infrastructure and private water supplies. Detailed design and construction planning will ensure that existing water mains, service connections, drainage infrastructure, farm drainage systems, private wells, livestock water supplies, group water schemes and other utility services are identified and protected. Where existing services are crossed or are located in proximity to the proposed works, the works will be undertaken in consultation with the relevant asset owners and service providers, including Uisce Éireann and the Lisheenkyle Group Water Scheme, as appropriate. Any temporary disruption or potential damage arising during construction will be promptly rectified and affected services reinstated in accordance with the requirements of the relevant asset owner.

The Applicant further confirms that construction activities will be subject to ongoing environmental management, inspection and monitoring to ensure compliance with the mitigation measures outlined in the EIAR, NIS and CEMP. This will include implementation of appropriate safeguards to prevent sediment release, fuel contamination, concrete washout or other pollutants entering groundwater, drainage systems or watercourses.

Accordingly, having regard to the site-specific hydrogeological assessment, the mitigation measures incorporated into the project design, and the commitments contained within the CEMP, it is concluded that the proposed development will not result in deterioration of groundwater quality, adverse effects on existing water supplies, disruption of groundwater flowpaths, or significant impacts on surface water, groundwater, private water supplies, group water schemes or public water infrastructure.

4.6 Biodiversity, Hedgerows and Trees

Summary

Submissions raise matters relating to biodiversity, habitats and ecological receptors along and in the vicinity of the proposed 220kV substation and underground grid connection route. Issues identified include potential effects on hedgerows, drystone walls, mature roadside trees, shelter belts,

root systems, roadside vegetation, ecological corridors and general rural biodiversity during construction. A number of submissions refer to the potential disturbance or loss of habitat used by bats, birds and other wildlife, including the role of hedgerows and mature trees as commuting, foraging and nesting habitat. Concerns are also raised regarding the adequacy of ecological surveys, the timing of vegetation clearance, protection of protected species, reinstatement of hedgerows and roadside vegetation, and the need for appropriate construction-stage mitigation, monitoring and ecological supervision.

Response

The potential for impacts on protected sites (European and national) and sensitive habitats or species as a result of the Proposed 220kV substation and underground grid route construction or operation have been considered in detail in the EIAR and NIS. It is important to note the proposed grid route is located within the existing road network, with the exception of the three Directional Drilling locations and from the proposed substation to the L3103. These reports have been prepared in line with all relevant European and national legislation, and the most up to date guidance documents available. Where required, design and mitigation measures have been developed to reduce any potential impacts. In addition, the landscaping plan includes significant tree planting along the boundary of the site and new hedgerows along the access road which are habitats that are rare in the area. The EIAR and NIS concluded that there would be no significant impact on protected species or local ecology due to construction or operation of the Proposed Project (no adverse effects on the integrity of Natura 2000 sites which were screened in for the NIS).

*The design and scope of the bat surveys were appropriate and proportionate to the nature, scale and location of the proposed development, and were informed by a combination of desk study, preliminary site appraisal, habitat characterisation and expert opinion. The survey approach was developed having regard to the existing baseline conditions, including the predominantly open, exposed and intensively managed agricultural character of the proposed substation site. The bat surveys methodology was based on the most recent Conservation Trust guidelines (2023), as stated in Section 5.2.2.1 of Volume 2 of the EIAR. Chapter 5 Biodiversity, Volume 2 of the EIAR presents results of the baseline bat surveys undertaken by Dr. Caroline Sheil on behalf of AtkinsRéalis. No Lesser Horseshoe bats (*Rhinolophus hipposideros*), which is listed on Annex II of the EU Habitats Directive, were recorded using the site.*

The full grid connection route was surveyed by suitably qualified Ecologists on 7/02/2025 and 6/06/2025. With the exception of the three HDD locations the grid connection is located within existing road carriageway, as such this will not require the removal of any habitats. The three HDD crossing are located on the historic road alignment prior to the construction of the motorway and new overpasses. As such these areas have been recently disturbed, with grassy verges, hedgerows and scrub re-establishing in recent years. Therefore, the habitats present are relatively young and do not provide roosting habitats for bats. Given

that these habitats lead to the motorway and not to other suitable bat habitats they are not considered important commuting routes. The HDD locations will be reinstated post works. Given the above no additional surveys were considered necessary for the grid connection route.

The design and scope of the ornithological surveys were appropriate and proportionate to the nature, scale and location of the proposed development, and were informed by a combination of desk study, preliminary site appraisal and habitat characterisation. The survey approach was developed having regard to the existing baseline conditions, including the predominantly open, exposed and intensively managed agricultural character of the proposed substation site, the absence of wetland habitat within the development footprint, the limited availability of suitable roosting, nesting or foraging habitat for birds of conservation concern, and the existing influence of surrounding transport and infrastructure corridors. The scope of survey was also informed by desktop review of previous bird records, the location and qualifying interests of designated sites within the wider area, and the identification of any potential ecological corridors or functionally linked habitat. On this basis, the survey methodology was targeted to the receptors and impact pathways most likely to be relevant, including breeding birds, wintering birds, field-feeding species and potential disturbance pathways. The survey work therefore provided a robust and proportionate baseline for the assessment presented in Chapter 5 Biodiversity, section 5.4.2.7, Volume 2 of the EIAR.

The full grid connection route was surveyed by suitably qualified Ecologists on 7/02/2025 and 6/06/2025. As set out above, with the exception of the three HDD locations, the grid connection is located within existing road carriageway, as such this will not require the removal of any habitats. The three HDD crossing are located on the historic road alignment prior to the construction of the motorway and new overpasses. As such these areas have been recently disturbed, with grassy verges, hedgerows and scrub re-establishing in recent years. There are no suitable habitats for wintering or field feeding birds along the grid connection route. There is some suitable habitat at the HDD crossings for breeding birds, however, this is considered as low quality given the sparseness of the vegetation and level of disturbance due to the proximity to the motorway. In addition, any vegetation clearance will take place outside of the breeding bird season and the area will be reinstated post works. Given the above additional surveys were not considered necessary for the grid connection route.

It is acknowledged that the potential impact of the project on mature roadside trees, shelter belts, and root systems is of great concern to the neighbouring landowners and local community. A robust arboricultural assessment and survey has been carried out, as presented in Volume 3, Appendix 5.3 of the EIAR. There will be no significant impact on trees (including root systems) and bushes following the implementation of the tree protection measures which are clearly set out in Volume 3, Appendix 5.3 of the EIAR. The applicant is committed to

ensuring that all mitigation measures are fully implemented during the construction phase of the grid connection.

4.7 Landscape, Visual Impact and Rural Character

Summary

A number of submissions refer to potential effects on landscape character, visual amenity and the rural setting of the area. Matters raised include the visual presence of the proposed substation, telecommunications mast, underground grid connection works and wider energy infrastructure proposals, as well as cumulative infrastructure pressure, local heritage, rural character and the cultural identity of Athenry. Submissions also raise concern that insufficient visual material, including photomontages, verified views or other visual representations, has been provided to enable local residents and decision-makers to fully understand the likely appearance of the proposed development from nearby dwellings, local roads and surrounding viewpoints.

Response

The substation, telecommunications mast and underground grid connection, subject of this planning application, form part of the wider Cashla Peaker Plant Project and were assessed within the EIAR as part of a single, combined project. Chapter 6 therefore considers the landscape and visual effects of these elements together with the other components of the Proposed Project, rather than in isolation.

The LVIA was undertaken in accordance with GLVIA3 and is supported by ZTV mapping, field survey, representative viewpoint photography and verified photomontages. The submitted visual material illustrates the combined appearance of the above-ground elements of the Proposed Project from a range of surrounding receptor locations and viewing directions and provides a proportionate basis for assessing the likely landscape and visual effects. Chapter 6 confirms that the ZTV was used to inform the selection of representative viewpoints and that the subsequent viewpoint assessment considers visual effects from within the ZTV study area.

The ESB substation building and compound, telecommunications mast and other above-ground elements form part of the Proposed Project identified and assessed in Chapter 6. The LVIA identifies visibility of taller structures from certain locations and reflects this visibility in the reported magnitude and significance of visual effects.

The underground grid connection is also included within the Chapter 6 assessment. The LVIA identifies short-term visual effects during construction associated with the laying of the underground cable for certain nearby receptors. Once construction of the underground cable is completed, these effects reduce to Neutral.

Chapter 6 concludes that, while a limited number of significant residual visual effects would occur principally within the immediate context of the main site, effects beyond these areas would be Slight or Neutral and not significant in EIAR

terms. Effects on the Central Galway Complex Landscape Type during operation are assessed as Slight Adverse, while effects on the Urban Environs (Athenry) Landscape Character Type are assessed as Neutral and not significant in EIAR terms. Cumulative landscape and visual effects with other relevant proposed and permitted developments are also specifically considered in Chapter 16.

Accordingly, the landscape and visual effects of the substation and underground grid connection infrastructure, including their relationship with the wider Proposed Project, have been assessed within the EIAR. The above-ground elements are considered through the ZTV, representative viewpoint and verified photomontage assessment, while the LVIA separately addresses the temporary construction-phase visual effects associated with installation of the underground grid connection. The EIAR therefore provides information to understand the likely landscape and visual effects of the development from the surrounding area.

On this basis, the Applicant considers that sufficient visual information has been provided to enable the likely landscape and visual effects of the proposed development to be understood and assessed, including its relationship with the wider Cashla Peaker Plant Project and other relevant cumulative developments.

4.8 Consultation, Public Participation and Landowner Engagement

Summary

A number of submissions refer to the extent and nature of consultation with residents, landowners, farmers, schools, businesses and vulnerable residents. Issues raised include direct engagement, availability of property-specific information, clarity on road closures and construction phasing, diversion arrangements, wayleaves, compensation and landowner consent. Some submissions also refer to public participation and transparency obligations, including under the Aarhus Convention.

Response

The Applicant acknowledges that a number of submissions express dissatisfaction with the public consultation process. While it is recognised that not all concerns can be resolved through consultation, the Applicant undertook a comprehensive programme of non-statutory engagement prior to submission of the application. Galway County Council acknowledged this engagement and did not raise any concern in principle regarding the approach taken.

Community engagement formed an integral part of the project development process. Consultation commenced at pre-application stage, before the S182A application was finalised, so that feedback could be received at a point when it could inform the project design and preparation of the EIAR. Bord Gáis Energy remains committed to providing information as the project progresses through the planning, construction and operational phases, should permission be granted.

A range of communication channels was used to maximise awareness of the project and provide accessible opportunities for engagement. These included public information events, locally distributed information, direct correspondence

with stakeholders, print media activity, a dedicated project website, and project contact details for follow-up queries. Following submission of this grid connection application, a hard copy of the EIAR was also made available in Athenry public library. This multi-channel approach was intended to enable members of the public, including those without technical expertise, to understand the nature and purpose of the proposed development, identify the principal environmental topics under assessment, raise questions and receive timely responses.

The leaflet distribution area was selected on a reasonable and proportionate basis having regard to the location and nature of the proposed development, the surrounding settlement pattern, nearby residential receptors, local roads, the community catchment and the grid connection route. The May 2025 and December 2025 leaflet drops provided plain-English information directly to households and premises within the area most likely to be aware of, affected by, or interested in the proposed development. Wider awareness was supported by public information events, newspaper notices, 20 consultation posters displayed locally, the project website, stakeholder correspondence and the availability of the Community Liaison Officer.

The consultation process is summarised in Section 1.11 of Volume 2 of the EIAR and in the Cashla Peaker Plant Non-Statutory Public Consultation Report submitted with the application. Engagement included local residents, landowners, businesses, community groups, a local concern group, TDs, councillors and other stakeholders. The process was supported by a Community Liaison Officer, who acted as an accessible point of contact between the local community and the project team. The CLO attended local meetings, engaged with landowners and residents, participated in leaflet drops, and attended a meeting with local concern group representatives and elected representatives, including TDs and county councillors, on 16 October 2025. The CLO's mobile number and email address were made available from the outset and formed part of the project communication strategy.

Feedback received through consultation was recorded, reviewed and directed to the relevant project team members and technical specialists for consideration in the EIAR. Bord Gáis Energy used the Atlas stakeholder management system to record stakeholder details and interactions, including letters, emails, telephone calls, meeting notes and submissions. The most frequent issues raised related to potential health impacts from air emissions, operating hours, potential diesel use, construction disruption, visual impact, noise, construction traffic and the Community Benefit Fund. These matters are addressed in the relevant sections of the EIAR, with a summary of key feedback and cross-references provided in Section 1.11 of Volume 2. Bord Gáis Energy also committed to acknowledging queries within 72 hours and to providing timely and appropriate responses.

The Applicant also took steps to ensure that public-facing material was fit for purpose and accessible to a non-technical audience. The project website, consultation brochure and information boards used at public consultation events explained the key elements of the project, the main environmental topics under assessment and the process for raising queries or concerns. Technical issues raised by members of the public were directed to the appropriate specialists for response and, where relevant, addressed in the EIAR.

The Applicant considers that the non-statutory consultation approach supported the principles underpinning the Aarhus Convention, including early access to project and environmental information, opportunities for participation at an early stage, and transparency in how issues raised were recorded and considered. While the statutory public participation process is provided through the SID application procedure before An Coimisiún Pleanála, the Applicant's early engagement supplemented that process by making information available in advance of the application, providing accessible points of contact, recording feedback received and ensuring that relevant matters were considered by the project team and addressed in the EIAR where appropriate.

Bord Gáis Energy's approach to community engagement is also informed by its Code and Values, which set expectations for engagement to be undertaken with integrity, fairness, responsibility and respect. The Applicant considers that the consultation process to date has established communication channels and stakeholder records that can continue to support transparent engagement, timely responses to queries and the provision of project updates. Bord Gáis Energy remains committed to ongoing engagement throughout the SID application process and, should permission be granted, through the construction and operational phases. A Community Liaison and Engagement Plan could also be developed if required by condition.

On this basis, the Applicant considers that the consultation process provided meaningful opportunities for public participation and that the issues raised through consultation were appropriately recorded, reviewed and considered as part of the project assessment.

The proposed development subject of this planning application will be carried out entirely within the red-line boundary shown on the site Layout plans (Refer to site layout plan drawings prepared by TLI included in the planning application drawings pack with the Drawing Ref Nos: 300101269-DR-105 to 300101269-DR-116 inclusive). The relevant landowner consents were submitted with the planning application. No additional third-party lands or boundaries are affected or required to facilitate access to the proposed development.

Additionally, it is important to note that the works along the public road will be carried out by a statutory undertaker, namely either by the Electricity Supply Board (ESB) or by the applicant pursuant to a consent granted by the Commission for the Regulation of Utilities (CRU) under section 48 of the Electricity Regulation Act 1999 (as amended). Accordingly, there is no requirement for the applicant to have landowner consent to apply for planning approval in respect of this aspect of the proposed development that will be carried out in the public road.

4.12 Electromagnetic Fields

Summary

Some submissions refer to electromagnetic fields associated with high-voltage underground cabling. Matters raised include perceived health concerns, potential effects on livestock and requests for clarification regarding the assessment of electromagnetic fields associated with the proposed 220kV underground grid connection.

Response

The potential human health and environmental effects which could be generated via electromagnetic fields (EMF) associated with high-voltage underground cabling has been fully and robustly assessed within Volume 2 of the EIAR (refer to Chapter 4 Population and Human Health).

No potentially significant EMF will be generated during the construction or operational phases of the proposed development.

The guidelines that apply to extremely low frequency (ELF) fields, including those from power systems at 50 Hz are: ICNIRP 1998 Guidelines (basis for EU Council Recommendation 1999/519/EC).

While, detailed design is still ongoing, it is possible at this stage to note some key elements and assumptions that demonstrate there will be negligible risk to human health from the Proposed Project. It is anticipated that the cable will be of 220 kV and buried at a depth of approximately 0.6 – 1.2m. For such a cable at this depth, at surface level directly above the trench, magnetic fields typically range from a few μT up to 20–30 μT under maximum load for 220 kV circuits.

As such, these values are well below the ICNIRP public limit of 100 μT (and even further below the 200 μT 2010 guideline). It is also understood that the operation of the proposed plant will only be at periods when national electricity demand requires. Magnetic fields only occur when an electric current is flowing. As such, the potential for magnetic fields to be generated, will only occur during those days when the Proposed Project is operational.

There are not anticipated to be any impacts on residents from EMF arising during the operational period. Design will be within the required thresholds set out in appropriate guidance (including ICNIRP). No significant effects will occur.

4.13 Utilities and Existing Infrastructure

Summary

Submissions also raise matters relating to interaction with existing utilities and infrastructure. Issues identified include private water services, public water infrastructure, telecommunications, monitored emergency systems, public lighting, gas infrastructure, group water scheme assets, Uisce Éireann infrastructure, future service connections and the need to maintain service continuity during construction. A number of submissions raise concern regarding the capacity of the Castletambour bridge to facilitate the grid connection works due to the conclusions set out in the application documentation regarding its capacity to facilitate project loads.

Response

The concerns raised regarding interaction with existing utilities and infrastructure are noted. The Applicant recognises the importance of maintaining continuity of existing services throughout the construction and operational phases of the proposed development and has undertaken detailed assessment and consultation with relevant utility providers and infrastructure stakeholders as part of the design process.

The proposed development has been designed to minimise impacts on existing infrastructure, including public water infrastructure, group water scheme assets, private water services, gas infrastructure, telecommunications networks, public lighting, service connections, monitored systems and other third-party utilities. Existing utility records, site investigations and stakeholder engagement have informed the design and routing of the proposed works, and further detailed utility surveys will be undertaken prior to construction, where required.

In respect of public water infrastructure, Uisce Éireann has confirmed that the Applicant has engaged extensively with its Diversions Team and that a Diversions Agreement has been reached in relation to identified asset interactions along the route. Uisce Éireann has advised that the agreed diversion and protection measures resolve the potential impacts on its infrastructure to its satisfaction. Works in the vicinity of public water and wastewater assets will be undertaken in accordance with the requirements of Uisce Éireann, the Diversions Agreement, and all applicable standards and specifications.

The Applicant also acknowledges the importance of protecting existing local utility infrastructure. Prior to construction, engagement will be undertaken with affected landowners, utility providers and relevant stakeholders to confirm the location of existing services and agree appropriate protection measures. Where crossings or temporary interventions are required, construction methodologies will be developed to ensure continuity of service and minimise disruption. Any damage or interruption arising during construction will be promptly rectified and services reinstated to the satisfaction of the asset owner.

Construction activities will be carried out in accordance with the CEMP and Construction Traffic Management Plan (CTMP), which include procedures for utility protection, stakeholder liaison, traffic management, emergency access arrangements and service reinstatement. These measures will ensure that existing infrastructure continues to operate safely and effectively throughout the construction period.

With regard to Castletambert Bridge, submissions referencing the findings of the project assessments are noted. A detailed structural assessment of bridges and structures along the proposed haul and construction routes was undertaken as part of the engineering design process and formed part of the Exceptional Abnormal Load (EAL) assessment. This assessment considered the capacity of relevant structures to accommodate construction traffic and abnormal load movements in accordance with applicable TII standards and methodologies. The completed assessment identified suitable routes and operational controls for project-related traffic, including abnormal load deliveries, and informed the selection of the preferred route. Any construction traffic, temporary works or utility installation activities associated with the proposed development will be undertaken in accordance with the findings and recommendations of these assessments and in consultation with the relevant road authority and bridge owner. From a structural perspective, no issues are anticipated regarding the proposed grid connection works in relation to Castletambert Bridge. Construction traffic and normal highway vehicles, including trucks and lorries associated with the works, would be within the loading range for which the bridge is designed.

Accordingly, having regard to the utility consultations undertaken, the agreed diversion arrangements, the proposed protection and reinstatement measures, and the construction management controls incorporated into the project, it is considered that the proposed development can be implemented without significant adverse effects on existing utilities, infrastructure, service continuity or public assets.

4.14 COMAH, Safety and Fuel Storage

Summary

Several submissions raise concerns regarding safety matters associated with the wider Cashla Peaker Plant, including fuel storage, low sulphur diesel, gas infrastructure, fire and explosion risk and COMAH considerations. These matters primarily relate to the separate Section 37E application for the Cashla Peaker Plant rather than the current 220kV substation and grid connection application.

Response

It is noted that a number of submissions raise concerns regarding major accident hazards and emergency response arrangements associated with the adjacent Cashla Peaker Plant project. These matters were raised in the public submissions made under Case Ref. ACP-324113-26 and have been comprehensively addressed in the Applicant's response to submissions for that application. As the proposed 220kV substation and grid connection do not form part of the COMAH site, these matters are not considered to be relevant to the current application.

4.15 Emergency Planning and Emergency Access

Summary

Submissions also raise matters relating to emergency planning and emergency access. Issues identified include the potential for construction traffic management, temporary road closures or diversion arrangements to affect ambulance access, fire service access, community defibrillator access, access to medically vulnerable residents and general emergency response times. Some submissions also refer to the need for clear communication protocols, emergency access arrangements and coordination with relevant emergency service providers during the construction phase.

Response

The concerns raised regarding emergency planning, emergency access and the potential impacts of construction activities on emergency response arrangements are noted. The Applicant recognises the importance of maintaining uninterrupted access for emergency services, medically vulnerable residents, community facilities and critical response infrastructure throughout the construction phase of the proposed development.

The construction works will be undertaken in accordance with the CEMP and CTMP which can be found enclosed in Volume 3 Appendix of the EIAR. A final Construction Traffic Management Plan (CTMP) and Construction Environmental Management Plan (CEMP), will be developed and implemented in consultation

with the relevant authorities and stakeholder prior to commencement of development. These plans will include specific provisions to ensure that emergency access is maintained at all times during construction, including during periods where temporary traffic management measures, lane restrictions, shuttle working arrangements or localised road closures are required.

The CTMP provides for the maintenance of access to properties, farms, businesses and emergency services throughout the construction period. Traffic management arrangements will be designed to ensure that emergency vehicles, including ambulances, fire appliances and Garda vehicles, can safely and efficiently access all areas served by the local road network. Procedures will also be implemented to facilitate immediate passage of emergency vehicles where necessary, including the temporary suspension of works, removal of traffic management controls or the provision of alternative access routes where appropriate.

The Applicant acknowledges the concerns raised in relation to access for medically vulnerable residents, community defibrillator facilities and other critical community services. Prior to commencement of construction, engagement will be undertaken with local stakeholders, emergency service providers and affected landowners to identify any location-specific access requirements and to ensure that appropriate contingency arrangements are incorporated into construction planning.

Clear communication protocols will form part of the construction management process. Advance notification of planned traffic management measures, road closures and temporary diversions will be provided to affected residents, landowners, emergency service providers and other relevant stakeholders. Construction traffic management arrangements will be subject to ongoing review and monitoring throughout the construction phase to ensure their continued effectiveness and to allow modifications where required to address emerging issues or stakeholder concerns.

In addition, the proposed road closure and utility installation works will be undertaken in a phased and controlled manner, with works generally progressing in short sections to minimise disruption and maintain local accessibility. Diversion routes and traffic management measures will be implemented where required, while maintaining access to residences, farms, businesses, community facilities and emergency services at all times.

Accordingly, having regard to the commitments contained within the CTMP and CEMP, the Applicant is satisfied that appropriate emergency access arrangements can be maintained throughout the construction phase. The proposed development will not give rise to significant adverse effects on emergency service response, access to medically vulnerable residents, community emergency facilities or the management of emergency incidents.

5. Conclusion

The Applicant acknowledges the concerns expressed by members of the public throughout the consultation process. These submissions have informed careful consideration of the issues raised and have been reviewed alongside the findings of the EIAR, Natura Impact Statement and accompanying technical reports. Having regard to the environmental assessments undertaken, the proposed mitigation measures and the applicable legislative and policy framework, the Applicant considers that the matters raised in the public submissions have been comprehensively addressed and do not alter the overall planning conclusions reached in support of the proposed development.

Appendix 1 Recommended Conditions by Galway County Council and Applicant Response

Recommended Condition	Applicant Response
1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, except as may otherwise be required in order to comply with the following conditions. Reason: In the interest of clarity.	<i>The applicant welcomes inclusion of the same.</i>
2. The period during which the development hereby permitted may be carried out shall be 10 years from the date of this order. Reason: In the interest of clarity and the proper planning and sustainable development of the area.	<i>The applicant notes that there are no defined appropriate periods for S182A development set out within the Planning and Development Act, 2000 and therefore requests that this condition is omitted.</i>
3. (i) The development shall be carried out strictly in accordance with all of the mitigation measures and monitoring proposals and in accordance with any timelines as set out in the Environmental Impact Assessment Report (EIAR) and appendices. (ii) The services of a suitably qualified and experienced environmental professional shall be retained to oversee and supervise the entirety of the construction works, and to provide monthly electronic reports to the planning authority (Planning and Environment Sections) detailing the stage of the works, and compliance with EIAR (including appendices). They shall be responsible for preparing and submitting quarterly reports to the Planning Authority during construction phase, detailing the results of any proposed monitoring, including the cleaning maintenance and inspection of the on-site systems including the site drainage system and hydrocarbon prevention measures. When site development works are completed, the suitably qualified and experienced environmental professional shall lodge with the planning	<i>The applicant welcomes inclusion of a similarly worded condition as follows to cover (i) and (ii):</i> <i>The development shall be carried out strictly in accordance with all of the mitigation measures and monitoring proposals detailed in the submitted documentation, including the Environmental Impact Assessment Report (EIAR) and the Natura Impact Statement (NIS) which shall be implemented in full within the timescales listed in the EIAR and the NIS. The developer shall appoint a project manager with appropriate experience to ensure the implementation of the mitigation measures within the timescales listed</i>

authority, a certificate indicating completion and compliance with the planning permission. All reports shall be forwarded in electronic format and shall be available to the public on request

(iii) The operational phase of the development shall be overseen by an appropriately qualified environmental professional to ensure that the operational mitigation measures as set out in the EIAR are fully implemented. Yearly monitoring reports shall be submitted to the planning authority by the annual anniversary of the grant of permission and shall detail the results of any monitoring proposed during operation.

(iv) In the event of any incident which poses a significant risk to surface water quality the developer shall immediately notify Inland Fisheries Ireland, the National Parks and Wildlife Service and the Environment Section of Galway County Council.

Reason: In the interest of clarity and protection of the environment during construction and operation.

Response to (iii): The operational phase of the wider Cashla Peaker Plant will be subject to an IE licence issued by the EPA. The substation and grid connection will not be subject to an IE Licence and will become Eirgrid Assets once operational and as such condition 3(iii) is not considered appropriate for this element of the project.

(iv) The applicant welcomes inclusion of this and notes that the IE Licence associated with the Cashla Peaker Plant will include a similar requirement to notify third parties in the event of a particular environmental incident on site.

4. (i) The development shall be carried out strictly in accordance with all of the mitigation measures as set out in the Natura Impact Statement. If there is a conflict between the EIAR, CEMP and the Natura Impact Statement (NIS), the provisions and mitigation measures in the Natura Impact Statement shall take precedence.

(ii) During the enabling works/construction stage of the proposed development, the appointed contractor shall adhere to Mitigation Measures as set out NIS. A suitably qualified ecologist shall oversee the implementation of the construction, operation and decommissioning mitigation measures set out in the NIS and shall list and certify that the construction mitigation measures as set out in the NIS have been carried out in full and that all operational mitigation measures are in place. This certification shall be submitted to the planning authority for written agreement prior to the commissioning of any turbine.

- (i) The applicant welcomes inclusion of the same.*
- (ii) The applicant welcomes inclusion of the same with a minor amendment to remove reference to the operational and decommissioning phases as, once operational, the proposed substation and grid connection will become Eirgrid Assets forming a permanent node on the transmission network. Recommended amendment below:*

"During the enabling works/construction stage of the proposed development, the appointed contractor shall adhere to Mitigation Measures as set out NIS. A suitably qualified ecologist shall oversee the implementation of the construction operation and

REASON: In the interest of ensuring the proper planning and sustainable development of the area and in order to protect Natura 2000 sites.	decommissioning mitigation measures set out in the NIS and shall list and certify that the construction mitigation measures as set out in the NIS have been carried out in full and that all operational mitigation measures are in place. This certification shall be submitted to the planning authority for written agreement prior to the commissioning of any turbine."
5. The external finishes, materials and colours of the proposed buildings shall be submitted to and agreed in writing with the Planning Authority prior to commencement of works. Reason: In the interests of visual amenity and orderly development.	<i>The applicant welcomes inclusion of the same.</i>
6. The Planning Authority shall be informed in writing of the date of commencement of site development works and shall be given at least two weeks' notice. Reason: In the interest of proper planning and sustainable development and to protect the amenity of the area.	<i>The applicant welcomes inclusion of the same.</i>
7. Prior to the commencement of development, the development shall lodge with the planning authority a cash deposit/bank bond or other such security as may be acceptable to the planning authority, to secure the satisfactory reinstatement of the site on cessation of the project coupled with an agreement empowering the planning authority to apply such security or part thereof to such reinstatement. The form and amount of security shall be as agreed between the planning authority and developer or, in default of agreement, shall be referred to An Comisiún Pleanála for determination. Reason: To ensure the site is restored to a satisfactory condition.	<i>The applicant notes that the proposed development will become a permanent Eirgrid asset once operational therefore a site reinstatement bond is not required for this element of the project.</i>

8. Prior to commencement of development, the developer shall submit to and agree in writing with the Planning Authority a noise compliance monitoring programme for the subject development, including any mitigation measures. All noise measurements shall be carried out in accordance with International Organisation of Standardisation Recommendation R 1996 "Acoustics – Description, measurement and assessment of environmental noise" as amended by IOS Recommendations R 1996-1. The results of the initial noise compliance monitoring shall be submitted to, and agreed in writing with, the planning authority within six months of commissioning of the Peaker Plant. Reason: In the interest of residential amenity.	<i>The applicant notes that as the proposed substation and grid connection will form part of the national grid once operational and will become EirGrid assets this condition is not appropriate for the proposed development.</i>
9. Prior to commencement of development, the developer shall submit to and agree in writing with the Planning Authority a dust and emissions monitoring programme for the subject development, including any mitigation measures. All noise measurements shall be carried out in accordance with International Organisation of Standardisation Recommendation R 1996 "Acoustics – Description, measurement and assessment of environmental noise" as amended by IOS Recommendations R 1996-1. The results of the initial noise compliance monitoring shall be submitted to, and agreed in writing with, the planning authority within six months of commissioning of the Peaker Plant. Reason: In the interest of residential amenity.	<i>There appears to be an error with the latter half of the condition wording recommended by Galway County Council as it repeats condition 8 and requires noise mitigation and monitoring. However, the first part of the condition relates to dust.</i> <i>The applicant will ensure that mitigation measures for construction dust emissions are adhered to, as set out in the oCEMP (Appendix 2.10, Volume 3 of the EIAR). Any conditioned dust monitoring and mitigation requirements should only apply to the construction stage as, once operational, the proposed development will form part of the national grid and will become Eirgrid assets.</i>
10. All liquids, hydrocarbons, chemicals, oils, etc. shall be stored in a dedicated, waterproof bunded area of sufficient volume to hold 110% of the volume of the largest tank within the bund. All valves on the tanks shall be contained within the bunded	<i>The applicant notes that this condition is not appropriate to the proposed development which only comprises the substation and grid connection. The</i>

area. All operations involving the loading and unloading of hydrocarbon products shall take place in a bunded area in such as manner as to safeguard the amenities of the area and prevent water pollution Reason: To avoid pollution of waters.	<i>Peaker Plant, to which this condition relates, is subject of a separate planning application.</i>
11. All construction waste generated on site shall be disposed of through appropriately licenced collection and disposal contractors. Reason: To safeguard the amenities of the area.	<i>The applicant welcomes inclusion of the same.</i>
12. Construction works shall take place between 0800 and 1800 Monday to Friday and between 0800 and 1400 on Saturday. No works shall take place outside these hours or on Sundays or Bank Holidays unless otherwise agreed in writing with the Planning Authority. Reason: To protect residential amenities.	<i>As set out in the oCEMP and Planning Statement that accompanies the planning application, construction works for the proposed development are expected to take place between 07h00 and 18h00 (Monday to Friday – Substation and Grid Connection) and between 07h00 and 14h00 (Saturdays – Substation only). No works are expected to take place outside these hours or on Sundays or Bank Holidays. On certain occasions, work may need to be undertaken outside of the typical working day to expedite progress, meet critical milestones, or address unforeseen circumstances that could impact the programme; however all such works would only be carried out following prior consultation with Galway County Council.</i> <i>To facilitate this, it is respectfully requested that any forthcoming Grant of Permission include the following Condition or similar:</i> <i>“Construction activities associated with the development shall be carried out only between the hours of:</i>

	• 07:00 to 18:00 Monday to Friday; and • 07:00 to 14:00 on Saturdays (Substation only), with no construction activity permitted on Sundays or Public Holidays, unless otherwise agreed in writing with Galway County Council. In exceptional circumstances, work outside these hours may be undertaken where necessary to address unforeseen events, ensure safety, maintain programme-critical activities, or facilitate abnormal or exceptional load deliveries, subject to prior written agreement with Galway County Council save in the event of an emergency where prior written agreement shall not be required. <i>Reason: In the interests of residential amenity and environmental protection during the construction phase of the development."</i>
13. Construction and demolition waste shall be managed in accordance with a construction waste and demolition management plan, which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. This plan shall be prepared in accordance with the "Best Practice Guidelines for the Preparation of Resource & Waste Management Plans for Construction and Demolition Projects", published by the Department of the Environment, Heritage and Local Government in 2021. Reason: In the interest of sustainable waste management.	<i>The applicant welcomes inclusion of the same.</i>
14. Prior to commencement of development, details of the following shall be submitted to, and agreed in advance with the area engineer and agreed in writing with, the planning authority:	<i>The applicant notes the following response to each subsection:</i>

(i) Technical & structural pavement analysis such as level 1 and Level 2 pavement analysis that includes recommended Falling Weight Deflectometer (FWD) Testing, Ground Penetrating Radar (GPR) and core logs shall be provided to assess the pavement stress and strains at the critical design locations as required are to be calculated on proposed regional and local road trafficked routes, including number of axles to failure calculation requires verification.

(ii) Structural evaluation of all trafficked regional and local road network structures shall be evaluated and assessed for trafficked abnormal loads being generated by development.

(iii) The Applicant shall submit the following in support of the proposed development:

(iv) A comprehensive and detailed traffic and transport assessment in accordance with TII publications PE-PDV-02045.

(v) On site overhead lighting report assessed in line with the adverse impacts of indirect luminaire spill in accordance with National Spatial guideline publications (2012).

(vi) Prior to commencement of the development, the applicant shall commission a road safety audit (stage 1 / stage 2 audit). Recommendations arising from the audit, or alternative measures proposed therein by the developer and accepted by the auditor, shall be incorporated into the final design of the development at the expense of the developer. The audit shall be completed by an independent road safety auditor, at the developer's expense, and shall be submitted the planning authority.

(vii) Prior to commencement of the development, A design report shall be submitted to Roads & Transportation Dept and to the satisfaction of the Area Engineer in accordance to TII standards 'DN-GEO-03030 Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes'

(i) *Pavement structural assessment and structural assessment of bridges and culverts have been undertaken and submitted under EIAR Appendix 2 Part 4 (Pavement Analysis) and Appendix 2 Part 6 (Abnormal Load / Structural Assessment). These assessments confirm that the existing road network has adequate residual structural capacity to accommodate the proposed abnormal loads and construction traffic. No requirements for road widening or pavement strengthening were identified. These assessments will be updated at detailed design stage if required.*

(ii) *Abnormal load route assessment, including AutoTrack swept path analysis, structural appraisal of bridges and culverts, and identification of a preferred haul route, has been completed and is presented in EIAR Chapter 10, Appendix 2 Parts 4 & 6, and the Engineering Planning Report (Appendix 2 Part 1).*

(iii) *n/a*

(iv) *A detailed traffic assessment has been provided in EIAR Chapter 10 (Traffic and Transport). While the development does not meet the threshold criteria for a full Traffic and Transport Assessment (TTA), the submitted assessment adequately considers construction and operational traffic impacts.*

whilst on receipt of detailed design works to public road physical alterations including swept path analysis Road widening, Road make up materials, specifications and finishes that includes Drainage infrastructure and necessary visibility works which shall be further assessed as part of the Road Safety Audit Report.

(viii) Prior to commencement of development, and to the satisfaction of the Planning Authority, The applicant shall Submit a revised site layout plan to demonstrate sight distance triangles from new substation trafficked junction onto LP 3103 clearly showing details of both exit and entry sightline triangles and details of the vertical alignment available in the form of a longitudinal section in order to depict the existing road profile sightlines in both directions in respect of vehicular entrances. The required visibility from the proposed entrance and access to/from the LP-3103 local road network should strictly comply with Galway County Development plan 2022-2028 per DM Standard 28 and TII standards, in particular the provisions of visibility requirements as stated within Table 5.4 and Table 5.5 of TII Publications - DN-GEO-03060 Geometric Design of Junctions (priority junctions, direct accesses, roundabouts, grade separated and compact grade separated junctions) May 2023 for the design speed of the road from an x-distance 2.4m setback from the road edge and measured along the y-distance to the nearside road edge at specified object height from the dwell area to the sightline distance in accordance to TII standards. Forward visibility and stopping sight distances pertaining to right hand turning movements shall also be presented in both directions for each entrance in accordance with TII standards. The current extents of current hedgerow and/or boundary walling shall be set back to achieve clear and unobstructed sightlines in both directions and replaced with soft landscaping with new roadside passively safe boundary treatments proposed.

(ix) A letter(s) of consent from any adjoining landowner and relevant third parties consenting to set back their boundary in order to permanently achieve clear and

- (v) *The condition proposed by TII in section 3.2.5 of this report is of relevance and the applicant would welcome inclusion of the same in lieu of wording proposed under (v) here.*
- (vi) *The applicant notes that a RSA is not required in respect of grid connection works.*
- (vii) *The applicant welcomes inclusion of the same*
- (viii) *As set out in section 2.1.5.1 of the response, access to the site is subject of a separate live planning application and matters relating to sightlines and sight distances are not relevant to this application. As such this condition is not considered necessary.*
- (ix) *As per above, this condition is not considered necessary.*
- (x) *As above.*
- (xi) *As above.*
- (xii) *See response provided in section 2.1.5.2.*
- (xiii) *The applicant welcomes inclusion of same.*
- (xiv) *The applicant welcomes inclusion of same.*

obstructed required sight distances where current sight distance y- splay traverses through adjoining third party boundary is required.

(x) The applicant shall demonstrate that any adjoining lands to achieve required sight distance triangles as referred to above are within their control i.e. sightlines triangles outside the applicants red line boundary shall be outlined in blue on a revised site location map as per Article 22 (2)(b)(ii) of the Planning and Development Regulations, 2001 (as amended).

(xi) Sight distance triangles shall be maintained and kept free from boundary walling, vegetation, overhead poles or other obstructions that would reduce the minimum visibility required.

(xii) Grid connection Joint Slabs must be relocated off the public road and repositioned within adjacent lands under the applicant's control. It has not been demonstrated that no off carriageway alternative is practical in addition to the feasibility and construction of placement of such joint slabs within alternative /strategic passing bays.

(Xiii) A technical acceptance Report Technical Acceptance of joint bay structures beneath regional and/or local roads and which do not interface with national roads should be carried out in accordance with DOT Circular RW 10/2021 and TII standards. Technical Acceptance Report (TAR) shall record the agreed basis and criteria for the detailed design of the joint bay structure; and Certification by the Design/Assessor/Checker confirming that the design, assessment, specification or construction works complies with the TAR.

(xiv) Third party Networks shall be contacted prior to construction of any works shall be consented in advance by each service provider

REASON: In interest of Traffic Safety

15. (i) All surface water generated by the development shall be disposed of within the site and shall not be discharged onto the public road or adjoining property. (ii) Proposed development vehicular entrance(s) onto the public road and any tie into the existing road margin shall be cleared, graded, levelled and surfaced to a standard suitable for use to the satisfaction of the Area Engineer to prevent unbound material (loose stone) entering onto the public road. Proposed roads make up and tie in to include suitable drainage infrastructure to collect and dispose of surface water runoff from the existing public road. The provisions shall not increase the likelihood of flooding to the development property, the road or adjoining properties. Reason: In the interests of road safety and proper planning and sustainable development.	<i>The applicant welcomes inclusion of Condition 15(i) and (ii).</i>
16. Prior to commencement, details of the following shall be submitted to, and agreed in advance with the Area Engineer and agreed in writing with, the planning authority: (i) An independent vehicular Lazer road condition pavement survey for all surrounding local roads and bridges along the grid connection route, abnormal load routes, haul routes shall be carried out at the developer's expense by a suitably qualified person/firm during pre and post construction of the proposed development. This survey shall include a schedule of required works to enable the haul routes to cater for construction-related traffic. The extent and scope of the survey and the schedule of works shall be agreed to the satisfaction of the area engineer prior to commencement of development. The survey shall give a description of the local road network including each chainage section, lane, survey direction and measured length for each section. GPS co-ordinates at the beginning and end of each section shall also be tabulated with a clear map of start point of survey / chainage 0m-10m etc and shall	<i>The applicant welcomes inclusion of a requirement for a pre and post-construction road condition survey for the grid connection route, abnormal load route and haul routes.</i>

include pavement surface condition index (PCSI), structural index and surface index results for each 10 meter section surveyed. Results shall include details of any pavement distress including type, severity and quantity within each 10m intervals sections of local road surveyed. Post construction phase, Road Condition Pavement survey shall then be repeated in order for the Planning Authority to assess any damage of the public road network that may arise during the development works. (ii) Within three months of the cessation of the use of each public road/haul route to transport material to and from the site, aforementioned road survey and scheme of works detailing works to repair any damage to these routes shall be agreed in advance with the area engineer and shall be submitted to the planning authority. (iii) All works arising from the aforementioned arrangements shall be completed to the satisfaction of the area engineer at the developer's expense within 3 months of the cessation of each road's use as a haul route or other for the proposed development. Reason: In the interests of road safety.	
17. All necessary measures shall be taken by the applicant to prevent the spillage or deposit of clay, rubble or other debris on adjoining roads during the course of the works	<i>The applicant welcomes inclusion of the same.</i>
18. (i) A revised detailed Traffic Management Plan to incorporate existing road conditions., grid connection and cabling/ jointing works including detailed design of temporary traffic measures and signs for roadworks shall be submitted prior to development commencement and agreed in advance with the Area Engineer, which sets out proposed measures and best practice to be implemented during the construction phase of development. The outline TMP should address the following:	(i) <i>A Construction Traffic Management Plan (CTMP) has been submitted (EIAR, Volume 3, Appendix 2 Part 11), which provides a comprehensive framework for traffic routing, abnormal load management, temporary traffic measures, stakeholder coordination and mitigation proposals. An updated final CTMP can be submitted to the area engineer for agreement prior to commencement of development.</i>

Site Access and Egress, Traffic Management Signage, Stop/Go or road closure/diversion arrangements, Traffic Management Speed Limits, Road Cleaning, Road Condition, Implementation of Traffic Management Plan. It shall include details of construction traffic routing, the number of trips generated for deliveries and collections of materials from the site, provision for a storage compound and parking provision within the site, wheel washing and measures for control of dust and other pollutant materials the installation of which shall be the responsibility of the applicant.

(ii) A road opening license and an abnormal load license shall be obtained from Galway County Council, with aforementioned TMP & accompanying detailed Traffic management Design in accordance with Traffic Signs Manual (Chapter 8 - Temporary Traffic Measures and Signs for Roadworks), to be further agreed with Local Area Engineers including a phasing programme of the works indicating the timescale within which it is intended to use each public route to facilitate construction of the proposed development.

(iii) Regarding abnormal delivery routes, the Motorway/National Dual Carriageway Clearance shall be sought For abnormal loads exceeding 3 metres in width, the applicant shall contact TII's Motorway Traffic Control Centre via email at abnormalload@mtcc.ie

(iv) The applicant is advised that under a separate process, formal consent under Section 53 of the Roads Act, 1993 (as amended), for the proposed crossing of the M6 & M17 Motorway. Prior to the commencement of any development to implement this permission, the applicant shall submit to Galway County Council documentary evidence that Section 53 consent has been approved for the proposed M6 & M17 Motorway Crossing.

(v) Public Road including areas within Public Road Margins backfill and reinstatements including finished road levels shall be in accordance with Guidelines for Managing

- (ii) *All necessary consents will be obtained by the applicant. A phasing programme can be agreed with the area engineer.*
- (iii) *The applicant will engage with TII and all relevant stakeholders as part of the EAL permit process.*
- (iv) *All necessary consents will be obtained by the applicant.*
- (v) *The applicant notes this condition and welcomes include of the same. The area engineer will be consulted in advance of commencement of development.*
- (vi) *The applicant notes the reinstatement requirements and will engage with the roads engineer in advance of commencement of development.*

Openings in Public Roads (Purple Book – April 2017) as amended and shall be to the satisfaction of the Area Engineer.

(vi) Backfilling and reinstatement of excavations to be in accordance with the DOT's Guidelines for Managing Openings in Public Roads and in the case of National Roads, TII's publication CCPAV-04007 "Requirements for the reinstatement of Openings in National Roads". Additional ground improvement measures may be required, derived from the site investigations carried out. Where local road width is 6m or less, a full width of pavement reinstatement is required. This will include reconstruction of the DBM binder base and subbase on roads significantly impacted. In addition, certain roads may require additional strengthening in the form of geotextiles and shall be placed at the cost of the applicant as deemed applicable by the Roads Authority.

Reason: In the interests of road safety.

19. Prior to commencement of development, the developer/applicants shall lodge a transportation bond with the planning authority of a cash deposit amount to the sum to be agreed with the Planning authority, or other cash amount or form of security, as may be acceptable to the relevant planning authority, to secure the reinstatement of the public road and road markings which may be damaged by the transport of materials to the site, to secure the provision of existing drains, open space and other services required in connection with the development coupled with an agreement empowering the relevant planning authority to apply such security or part thereof to the satisfactory reinstatement of the public road network which includes any identified diversion routes.

Reason: In the interest of traffic safety and proper planning and sustainable development.

The applicant welcomes inclusion of same.

20. On completion of the development, a stage 3 road safety audit shall be completed by an independent road safety auditor, at the developer's expense, and submitted for the written approval of the planning authority. Any safety issues highlighted in the audit shall be reviewed and addressed by the developer at their expense. Reason: In the interests of road safety.	<i>The applicant welcomes inclusion of the same.</i>
21. Prior to commencement of development, unless otherwise agree in writing, the applicant shall pay a financial contribution to the Planning Authority, unless a phased payment has been agreed in writing with the Planning Authority. This charge shall be calculated using the Development Contributions Scheme adopted by Galway County Council in accordance with the provisions of Section 48 of the Planning and Development Act, 2000 (as amended). Reason: So that the developer shall pay an equitable portion of the cost of the services which facilitates and or which will facilitate the proposed development.	<i>The applicant welcomes inclusion of the same</i>

Appendix 2 Bord Gáis Energy Supplementary Responses

Bord Gáis Energy notes that a number of observations submitted by third parties raise concerns regarding the Applicant's approach to public consultation and stakeholder engagement. While the Applicant acknowledges and respects the views of all participants in the planning process, it considers that some aspects of these comments do not fully reflect the consultation activities undertaken or the extent of engagement carried out during the pre-application stage.

The three core pillars of the Stakeholder Engagement strategy for the Cashla Peaker Plant and Grid connection planning applications are to **Inform, Involve and Respond** to stakeholders regarding the planning, development and, subject to planning consent the construction and operation of the Cashla Peaker Plant. The key objectives of the three public information events carried out to date were to:

- Share and distribute accurate, accessible information with the public;
- Build trust, transparency and rapport between Bord Gáis Energy and the local community; and
- Capture any feedback, questions, or concerns from attendees at the event

As outlined in the EIAR and accompanying Planning Report, Bord Gáis Energy implemented a structured programme of non-statutory public consultation prior to the submission of the SID application. This programme included public information events, locally distributed information materials, newspaper notices, posters, a dedicated project website, direct stakeholder correspondence, and the appointment of a Community Liaison Officer (CLO) to serve as an accessible point of contact for residents and other stakeholders. One to one engagement with residents along the grid route was specifically organised and information leaflets provided including details of the December public consultation event.

In addition, the Applicant maintained a stakeholder management system to record correspondence, meetings, telephone calls and queries received throughout the consultation process. Queries and concerns raised by stakeholders were reviewed and responded to, and where technical matters arose, they were referred to the appropriate project specialists for consideration as part of the environmental assessment process and, where relevant, reflected in the EIAR.

Based on the key themes raised by third parties during the ongoing pre planning consultation phase, Bord Gáis Energy ensured that relevant third party subject matter experts were in attendance in respect of air quality and emissions, Health Safety and COMAH and road safety and construction traffic management. These third party SME's in addition to the core Atkins Réalis technical and environmental team and representatives from Bord Gáis Energy supported peoples understanding of the development and operational phases. Where there were specific questions raised during the consultation events Bord Gáis Energy arranged follow-up 1:1: sessions with, for example, the project ecologist and the project arborist.

Bord Gáis Energy respectfully requests that the Inspector consider the documented consultation record, including the Non-Statutory Consultation Plan and the information provided in Section 1.1 of the EIAR, when assessing matters relating to stakeholder engagement. The Applicant fully recognises the importance of public participation in the planning process and welcomes the opportunity for interested parties to express their views. It is, however, important that consideration of the consultation process is informed by the documented record of engagement activities undertaken and the information submitted as part of the application.

Person / Group	Issue Raised requiring clarification	Bord Gáis Energy Response
Damien Collins	Alleged he was pressured to sign an Option Agreement; claimed no surveying was undertaken on his lands; stated his concerns were not assessed; alleged Bord Gáis Energy and its agents did not contact him during project development.	Mr Collins submission has been addressed in Case Ref. ACP-324113-26. For completeness it may be noted that participation in the Option Agreement was entirely voluntary and Mr Collins engaged for approximately six months. Discussions ceased after it emerged an existing option agreement was already in place with another developer and later when Mr Collins chose not to proceed. Ecological surveys were undertaken with his permission before access was withdrawn. Mr Collins' property and farming concerns were assessed within relevant EIAR chapters and the CLO maintained regular contact, including invitations to public information events which he attended.
Oliver Freeney	Notes he owns two folios along grid route and company have not sought permission or engaged with Mr Freeney nor made any effort to discuss disruption along the route .	Bord Gáis Energy notes regular engagement with Mr Freeney in his role as Chair of the Cashla Concern Group, including meetings and follow-up correspondence. In respect of folios along the grid route this is addressed in Section 4.11. BGE have engaged widely and specifically with residents along grid route including 1:1: engagements created public awareness of impacts and mitigation measures proposed.