Planning Statement

For Cashla Peaker Plant 220kV Substation and Grid Connection

on behalf of Bord Gáis Energy Limited

March 2026

McCutcheon Halley
CHARTERED PLANNING CONSULTANTS

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1. Introduction

1.1 Overview of Report

McCutcheon Halley Planning Consultants (MHP) have prepared this planning statement on behalf of Bord Gáis Energy Limited (the Applicant). This planning statement has been prepared to accompany and support an application being submitted to An Coimisiún Pleanála (the Commission[1]) pursuant to Section 182A of the Planning and Development Act 2000, as amended (PDA 2000) for the proposed development of a 220kV Substation and 220kV Grid Connection, hereafter referred to as the 'Proposed Development'.

The Proposed Development is required to facilitate the connection of the proposed Cashla Peaker Plant, which is the subject of a separate Section 37E planning application (Case Ref: ACP-324113-26), to the existing Cashla 220kV Substation. The purpose of the Cashla Peaker Plant is to enhance the capacity and resilience of the national grid by providing additional generation at times when renewable energy production is insufficient to meet demand.

The proposed 220kV substation will be located within the boundary of the proposed Cashla Peaker Plant site within the townland of Rathmorrissy, Athenry, Co. Galway. The proposed 220kV grid connection will extend from the proposed 220kV substation to the existing Cashla 220kV substation via approximately 8.1km of underground cabling across the townlands of Rathmorrissy, Pollnagroagh, Moanbaun, Castlelambert, Knocknacreeva, Caraunduff, Caherbriskaun, Lisheenkyle East, Barrettspark, Cashla, Athenry, Co. Galway and within the L7109, L71093, L7108 and L3103 roads.

The purpose of this planning statement is to present a clear and structured rationale for the Proposed Development, to assess the proposal in the context of relevant European, national, regional, and local planning policy, and to demonstrate that the development is consistent with and supported by the applicable planning and energy policy framework

This application for approval is accompanied by an Environmental Impact Assessment Report (EIAR), and a Natura Impact Statement (NIS). These documents assess matters, such as traffic, noise, air quality, biodiversity, water, and landscape are comprehensively assessed within those supporting reports. To avoid unnecessary duplication, this Planning Statement does not replicate that material but instead refers to the EIAR or the NIS where appropriate, focusing primarily on the planning and policy framework underpinning the proposed development.

[1] An Bord Pleanála (the Board) officially changed its name to An Coimisiún Pleanála (the Commission) in June 2025 following the enactment of Part 17 of the Planning and Development Act, 2024.

1.2 Applicant Details

Bord Gáis Energy Limited (BGE) is the applicant for this planning application.

The company was established in 2009 following the separation of Bord Gáis Éireann's roles of gas network operator and energy supplier. In 2014, BGE became part of the Centrica plc Group. Centrica is a leading international energy services and solutions provider. Centrica supplies international energy and services to 26.2 million customer accounts mainly in Ireland, the UK and North America through its brands including BGE, British Gas and others.

As a vertically integrated energy company, BGE is investing for the future in innovation energy projects and assets, to support a secure and stable supply of energy in Ireland; and, using their market leading position to support their customers to decarbonise their homes, farms and businesses.

BGE is fundamentally repurposing its business to become a leading green energy business, working towards energising a greener, fairer future. They are committed to achieving net zero by 2045, and to helping its customers to get to net zero by 2050. This involves significant investment. The company is underpinned by its parent company, Centrica, who has committed to investing £4 billion globally (with €1 billion in Ireland) over the next five years in the energy transition. This transition will see the company move from 500 megawatts of green and energy transition investments to 3,200 megawatts over the next six years, and in the process lead Ireland's energy transition agenda.

BGE will continue to be a major player in ensuring Ireland's security of supply as the State transitions to greener energy. They operate the 445 MW Combined Cycle Gas Turbine (CCGT) power plant in Whitegate, County Cork and is currently finalising the development of two new power plants, one within the Monksland Industrial Estate in Athlone, County Roscommon and the other at Profile Park, Dublin 22 involving investment of over €300 million.

In September 2024, BGE entered Ireland's Single Electricity Market Operator (SEMO) T-4 capacity auction for the 2027/2028 delivery year and secured a 10-year capacity contract from October 2028 to September 2038 for the project. The award of this capacity contract confirms the identified need for the project within the electricity system and reflects its role in supporting security of supply during periods of peak demand, in accordance with the objectives of national energy and climate policy.

1.3 Background and Legal Framework

1.3.1 Overview

Section 182A of the PDA 2000 provides that where a person intends to carry out development comprising, or for the purposes of electricity transmission infrastructure[2], an application shall be prepared and submitted to the An

[2] Section 182A(9) sets out that ""*transmission", in relation to electricity, shall be construed in accordance with section 2(1) of the Electricity Regulation Act 1999 but, for the purposes of this section,*

Coimisiún Pleanála (the Commission) for approval of the development under Section 182B.

The Proposed Development subject of this planning application constitutes electricity transmission infrastructure that is required to facilitate the connection of the proposed Cashla Peaker Plant development to the national grid. The proposed Cashla Peaker Plant, which comprises a natural gas fuelled electricity generation peaking plant, above-ground installation and ancillary infrastructure, is subject of a separate Section 37E planning application submitted to An Coimisiún Pleanála under Case Ref: ACP-324113-26.

The proposed Cashla Peaker Plant subject of the S37E application and the Proposed Development subject of this S182B application, along with a gas connection to the national gas grid which will be subject of a separate consent mechanism under section 39A of the Gas Act 1976, comprise the wider 'Cashla Peaker Plant Project'. While subject to separate statutory consent processes, these elements form a single integrated project that has been assessed within the accompanying EIAR and NIS.

1.3.2 Electricity Transmission Infrastructure

As set out above, certain electricity transmission infrastructure developments fall under the provisions of Section 182A of the PDA 2000 and as such an application for approval is required to be submitted directly to the Commission under Section 182B for such development.

Section 182E of the PDA 2000 requires that an applicant proposing to apply for approval under Section 182B shall enter into consultation with the Commission in relation to the proposed development before making the application.

In line with the provisions set out in relation to electricity transmission infrastructure under the PDA 2000, the applicant submitted a request on the 5th of November 2025 to enter into consultation with the Commission in relation to the proposed 220kV Substation and 220kV Grid Connection (Case Ref: ACP-323874-25).

The Commission issued a notice to the applicant under Section 182E on the 9th February 2026 that the Commission is of the opinion that the Proposed Development (subject of the consultation under S182E) falls within the scope of Section 182A of the PDA 2000. The applicant was instructed that an application for permission for the proposed development must be made directly to the Commission under Section 182A(1) of the Act. A Copy of the Commission's Opinion can be found enclosed in Appendix 1 of this Planning Statement.

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the foregoing expression, in relation to electricity, shall also be construed as meaning the transport of electricity by means of—

(a) *a high voltage line where the voltage would be 110 kilovolts or more; or*

(b) *an interconnector, whether ownership of the interconnector will be vested in the undertaker or not."*

1.3.3 Cashla Peaker Plant

Under the PDA 2000, Strategic Infrastructure Development (SID) is regulated by Sections 37A –37J, which set out the processes for applications to be made directly to the Commission where a proposed development falls within a project class specified in the Seventh Schedule.

Bord Gáis Energy Limited submitted a formal Section 37E planning application to the Commission on the 27th of February 2026 following receipt of an opinion under Section 37B(4)(a) that the proposed Cashla Peaker Plant is strategic infrastructure within the meaning of Section 37A of the PDA 2000. Although the Project is assessed in the EIAR and NIS submitted as part of this Section 182A application, for further details of the proposed Cashla Peaker Plant development, please refer to the plans and particulars submitted to the Commission under case ref ACP-324113-26.

2. Description of Proposed Development

2.1 Statutory Development Description

In accordance with section 182A of the Planning and Development Act 2000 (as amended), Bord Gáis Energy Limited gives notice of its intention to make an application to An Coimisiún Pleanála for approval for the proposed development of a 220kV Electrical Substation on lands at Rathmorrissy (Townland), Athenry, Co. Galway and the construction an underground grid connection route from the proposed Electrical Substation to the existing Cashla 220kV Substation. The grid connection route traverses approximately 8.1km along the L7109, L71093, L7108 and L3103 roads and across the townlands of Rathmorrissy, Pollnagroagh, Moanbaun, Castlelambert, Knocknacreeva, Caraunduff, Caherbriskaun, Lisheenkyle East, Barrettspark, Cashla, Athenry, Co. Galway. The site area is 12.11 hectares.

The proposed development will consist of:

a) The construction of a 4-bay 220kV electrical substation comprising of: one single-storey 220kV Air-Insulated Switchgear (AIS) Substation Building (approximately 388sqm) with welfare facilities, transformer, all associated electrical plant and apparatus, one telecommunication mast (approximately 36m high), security fencing, entrance gate, lighting, lightning masts, internal tracks, drainage (foul and storm), carparking (4 no. spaces), watermains and all ancillary works.

b) The installation of 220kV underground electricity cabling connecting the proposed 220kV electrical substation to the existing Cashla 220kV substation within a trench, consisting of underground cabling and ducting, 10 no. joint bays and associated communication chambers and link boxes, 2 no. crossings of the M6 motorway and 1 no. crossing of the M17 motorway by way of horizontal directional drilling, and all associated site development and reinstatement works.

An Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS) have been prepared in respect of the proposed development and accompany this planning application.

The proposed development will facilitate the export of electrical energy from a proposed natural gas fuelled electricity generation peaking plant, the 'Cashla Peaker Plant' on lands at Pollnagroagh and Rathmorrissy (Townlands), Athenry, Co. Galway which is the subject of a separate Strategic Infrastructure Development application to An Coimisiún Pleanála (Ref. ACP-324113-26) under section 37E of the Planning and Development Act 2000 (as amended). The Cashla Peaker Plant relates to development for the purposes of an activity requiring an Industrial Emissions Licence from the Environmental Protection Agency under the Environmental Protection Agency Act 1992, as amended and also relates to a COMAH establishment and falls under the requirements of the Chemicals Act (Control of Major Accident Hazards Involving Dangerous Substances) Regulations, 2015. It is

noted that the "project", subject of the EIAR and NIS, includes the Cashla Peaker Plant and Above-Ground Installation subject of the section 37E application (Ref. ACP-324113-26) and also includes the connection to the existing mains gas network (Mayo–Galway pipeline (BGE/85)) which will be undertaken via a new transmission pipeline (named GNI146) located within the townland of Rathmorrissy, Athenry, Co. Galway. A separate application to obtain approval for the GNI146 gas pipeline will be submitted under section 39A of the Gas Act 1976, as amended.

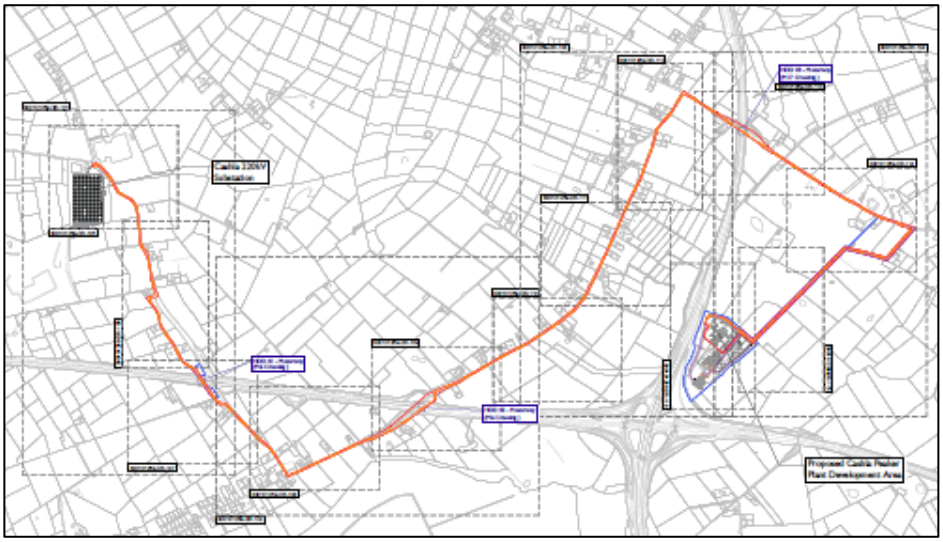

Figure 2.1 Extract from Site Location Map Overview Key Plan. Source: TLI Drawing No. 300101269-DR-100

2.2 Overview of Proposed Development and Processes

Chapter 2 of the EIAR provides a detailed overview of the project, including a full description of the processes involved. To avoid unnecessary repetition and in the interest of clarity, this section of the Planning Statement presents a summary description of the Proposed Development the subject of this planning application i.e., the proposed 220kV substation, 220kV underground grid connection and ancillary site development works only. It does not provide detail on the proposed Cashla Peaker Plant or the proposed gas transmission connection infrastructure elements of the wider project set out in the EIAR as these form part of separate consenting processes, as detailed in section 1.3. Reference should be made to the accompanying planning application drawings for further detail on the Proposed Development.

Having regard to the location of the proposed 220kV substation compound and a portion of the proposed 220kV grid connection route, which lie within the boundary of the wider Cashla Peaker Plant development site the subject of a separate S.37E planning application to the Commission (Case Ref: ACP-324113-26), access arrangements and landscaping proposals do not form part of this application for approval under S.182A. These elements are included within the separate Section 37E application and are assessed as part of the overall project in the EIAR. It is intended that the proposed 220kV substation compound will be accessed via a proposed new entrance off the L3103 and associated access track (approximately 1.15km in length) subject

of the S.37E planning application. Extensive landscaping proposals have also been provided as part of the S.37E planning application.

2.2.1 Proposed 220kV Substation Compound

A 220kV 4-bay Air Insulated Substation (AIS) will be constructed on site including a 220kV/33kV transformer, a shunt reactor and all associated electrical apparatus and equipment. This will be designed and constructed to meet EirGrid requirements and standards.

Within the AIS compound, a 220kV AIS Substation Building is proposed which will contain control and communication equipment for the transmission system operator to operate the substation and communicate with their external facilities. The building contains a workshop space, mess room and toilet facility. The building also contains a back-up low sulphur diesel generator to power the site in an exceptional case when neither the transmission connection nor the local ESB distribution connection are available. 4 car parking spaces will be provided adjacent to the substation building.

A 36m-high telecommunication mast will be located within the substation.

13 no. 20m-high lighting columns are proposed within the substation compound. Site lighting will be cowled and a lighting design report prepared by Lighting Reality can be found in Appendix 2 of the EIAR. Lightning Protection Masts will also be located within the substation compound.

The proposed 220kV substation compound will be accessed via a gated entrance at the eastern perimeter of the compound. The proposed 220kV substation will be enclosed by a 2.4m high palisade fence.

A storm sewer will be provided around the proposed 220kV substation building. It will tie into the proposed storm sewer for the Cashla Peaker Plant submitted under the Section 37E application.

A potable water connection will be provided to the proposed 220kV substation building. It will tie into the proposed potable water for the Cashla Peaker Plant submitted under the Section 37E application.

A foul sewer will be provided to the proposed 220kV substation building and will tie into the proposed foul sewer network for the Cashla Peaker Plant submitted under the Section 37E application.

2.2.2 220kV Grid Connection

Electrical power will be exported from the on-site 220kV AIS via an underground grid connection cable (approximately 8.1km in length) to the existing Cashla 220kV Substation which is owned and operated by EirGrid. The grid connection route consists of underground electricity cabling and ducting, 10 no. joint bays with associated communication chambers and link boxes and all necessary site development and reinstatement works.

For the majority of the route, the underground grid connection (UGC) follows the public road network in a westward direction from proposed 220kV Substation at Rathmorrissy, Athenry, Co. Galway to the existing Cashla 220kV substation at Barrettspark, Athenry, Co. Galway.

The UGC route predominantly traverses within the public road with some minor sections traversing within the margin of the public road (HDD Crossing 02 and 03, refer to Drawing Nos. 300101269-DR-109 and 300101269-DR-113) and privately owned lands (HDD Crossing 01, refer to Drawing No. 300101269-DR-107 prepared by TLI). This is necessitated by the use of a horizontal directional drilling (HDD) section to cross the M6 motorway in two separate locations and the M17 motorway in one location. The exact alignment of the underground cable within the public road network may be subject to minor localised adjustments at detailed design stage, where necessary, having regard to site-specific constraints identified during pre-construction surveys and in consultation with EirGrid and ESB Networks. Any such adjustments will not give rise to effects materially different from those assessed in the EIAR.

2.3 Construction Phase

2.3.1 Overview

This section should be read in conjunction with Chapter 2 of the EIAR, the Outline Construction Environmental Management Plan (oCEMP) and the Resource & Waste Management Plan (RWMP) prepared by AtkinsRéalis and the Construction Grid Connection Report prepared by TLI all enclosed in Appendix 2 of the EIAR.

Construction will be managed by an appointed Contractor in accordance with good practice and procedures set out in the oCEMP, the RWMP and the Construction Grid Connection Report. The oCEMP outlines the environmental management and control framework for the construction phase relating to waste, air quality, noise and vibration, climate management, pollution prevention, water resources and energy use, ecology, light pollution, archaeology and cultural heritage, traffic management, contaminated land control, soil erosion and sedimentation, material assets and landscape and visual, along with other best practice approaches.

2.3.2 Description and Duration

The construction of the proposed 220kV Substation and installation of the 220kV grid connection will be carried out in conjunction with the construction of the Cashla Peaker Plant (Case Ref: ACP-324113-26). It is anticipated that the construction will commence in Q2 2027 with procurement, construction, and commissioning activities lasting approximately 18 months, while the construction of the grid connection route is estimated to take nine months some of the elements may occur concurrently from Q2 2027 if necessary. The Cashla Peaker Plant Project is expected to be fully operational by Q4 2028 as detailed in Table 2.1, subject to timely receipt of the necessary statutory consents.

Table 2.1. Construction Phasing

Milestones	Timeframe
Submission of planning application	Q1 2026

ACP Planning Application decision	Q1 2027
Civil, Mechanical, Electrical Design, Site Survey works & Mobilisation start	Q1 2027-Q2 2027
Construction and Installation	Q2 2027-Q3 2028
Commissioning	Q3 2028
Commercial Operational Date	Q4 2028

2.3.3 Construction Hours

Table 2.2 outlines the proposed standard working hours which are set out for the proposed development in the oCEMP. It is anticipated that the 220kV Substation will be subject to the same construction hours as the Section 37E application, Cashla Peaker Plant.

Table 2.2. Standard Working Hours

Time Period	220kV Substation	Underground Grid Connection
Weekdays: Mon -Fri	07h00 – 18h00	07h00 – 18h00
Saturdays	07h00 -14h00	No Work
Sundays, Bank Holidays and Public Holidays	No Work	No Work

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. Refer to Section 6.3 of the oCEMP for further details.

To facilitate this, it is respectfully requested that any forthcoming Grant of Approval include the following **Condition** or similar:

Construction activities associated with the development shall be carried out only between the hours of:

- 07:00 to 18:00 Monday to Friday; and
- 07:00 to 14:00 on Saturdays (excluding grid connection works which will not take place on Saturdays),

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.

Reason:
In the interests of residential amenity and environmental protection during the construction phase of the development.

2.3.4 Construction Compound

There will be one site compound located adjacent to the proposed 220kV Substation during the construction works. Facilities will include welfare facilities and site offices for construction management and staff. Refer to Section 7.2. of the oCEMP for further information.

2.3.5 Construction Traffic

Construction traffic volumes, access routes, and traffic mitigation measures are addressed in the Construction Traffic Management Plan (CTMP) prepared by AtkinsRéalis provided in Appendix 2 of the EIAR and Chapter 10 Traffic and Transportation of the EIAR.

The grid connection installation activities are anticipated to generate small volumes of traffic and are not expected to coincide with peak construction activities associated with the proposed Cashla Peaker Plant.

However, due to limited road width along Lisheenkyle East (L7108) and L7109 roads, full road closures will be required to facilitate the grid connection works. While full closure is identified on these roads, only through-traffic will be impacted as residents will be able to access their properties from each side of the closure segments.

This will be facilitated via limiting trench lengths to sequential 30 to 50m sections (shorter segments between 2 – 5m will be implemented in scenarios where adjacent properties create short segments between access points). This will ensure residents' entry and egress from one side of a property is maintained at all times.

Partial road closures are anticipated on the L3103 where sufficient width is available for one-way traffic. Installation works will be carried out on one side of the road, while a minimum 2.5m wide carriageway will be maintained for traffic flow on the other side. The duration of grid connection activities is outlined in Table 2.3 below.

Table 2.3 Duration of Grid Connection Activities

Construction Activity	Total Duration	L3103	L7108	L7109
Main Cable Construction	6 months	1 month	3 months	2 months
Resurfacing	4 months	2 weeks	2 months	1.5 months

2.3.6 Exceptional Abnormal Loads

The Proposed Development requires the transfer of an Exceptional Abnormal Load (a transformer) to the site. An Exceptional Abnormal Load is defined as a vehicle heavier than 180 Tonnes and the Proposed Development will require the transport of components that exceed this weight.

The anticipated haul route for the abnormal loads will originate at the Port of Galway, proceeding via Lough Atalia Road (R339) before joining the N6 (which becomes the M6 motorway). The route will continue eastbound along the M6 to Junction 17 (R348) at Athenry. From this junction, the route will proceed via the R348 onto Ballygarraun South Road, before connecting to the L3103, which provides direct access to the Proposed Development site.

The final haul route will be confirmed prior to the first abnormal load delivery in accordance with the statutory abnormal load permitting process.

An Abnormal Load Assessment report and Haulage Route Pavement Analysis have been prepared by AtkinsRéalis and can be found enclosed in Appendix 2 of the EIAR. These reports evaluated the feasibility of transporting components from Galway Port to the Proposed Development site via two proposed routes and served to identify the preferred haul route which was confirmed as suitable for abnormal load transport (refer to oCTMP for detail on the haul route).

As set out in the oCTMP, the final haul route will be agreed prior to the delivery of extraordinary or abnormal loads to the site, which may occur several months after on-site construction begins. Pre- and post-construction surveys of the public road network proposed for use as haul routes, including inspections of bridges, culverts, and other relevant structures, will be carried out by the applicant before any phase involving abnormal load movements. These requirements do not apply to earlier phases without such movements. The scope and locations of these surveys will be agreed in advance with Galway County Council Roads Authority and include structural capacity assessments where required.

In accordance with national abnormal-load permitting requirements, the applicant will undertake detailed route assessment, secure the necessary Garda or Local Authority permits, and coordinate escorts and traffic management measures as required. This process includes early engagement to ensure no undue disruption to other road users. Final delivery timing and movement arrangements, such as off-peak or night-time transport to minimise traffic impacts will be confirmed with An Garda Síochána and Galway County Council and Galway City Council, reflecting best-practice planning to reduce disruption to regular traffic and maintain safety during abnormal-load movements.

It is respectfully submitted that any condition relating to construction working hours should have regard to the fact that abnormal or exceptional load deliveries are governed by the statutory abnormal load permitting process and agreed traffic management arrangements and deliveries may take place outside of standard construction hours.

It is envisaged that, prior to the first delivery of any abnormal or exceptional load to the site (and not prior to commencement of development generally), a detailed Abnormal Load Management Plan will be submitted to and agreed in writing with the relevant Roads Authorities. This Plan will confirm the final haul route, condition surveys of affected sections of the public road network (including bridges and culverts), any necessary accommodation works, traffic management measures, and confirmation of statutory abnormal load permits and Garda escort arrangements. The timing and management of such deliveries will be coordinated with the relevant road authorities and An Garda Síochána in accordance with the statutory abnormal-load permitting process.

It is respectfully submitted that any Grant of Permission include a **Specific Condition** to address this as follows:

> Prior to the first delivery of any abnormal or exceptional load associated with the development, the applicant shall submit to, and agree in writing with the relevant Roads Authority(s) an 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.
>
> 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.*

2.4 Project Need

2.4.1 Overview

The Proposed Development will facilitate the export of electricity generated from the proposed Cashla Peaker Plant to the national grid. Along with the gas connection the subject of a separate S39A consent, these elements constitute a single integrated project i.e., the Cashla Peaker Plant Project.

The purpose of this project is to enhance the capacity of the national grid by providing additional generating power when renewable energy production is insufficient to meet demand. The Cashla Peaker Plant will operate as a 'peaker plant' with minimal annual use (i.e. anticipated to be in the order of 100 hours per annum, though actual dispatch will be determined by system requirements), the facility will provide backup or 'flexible' generation during critical periods when renewable energy sources are insufficient to meet demand. In this context, a 'peaker plant' refers to a dispatchable, fast-start

facility operating intermittently to support system adequacy during periods when 'renewable energy sources' cannot meet demand.

Taking into account the interdependencies of the different elements, the following sets out an overview of the policy support for the project as a whole, not solely the electricity transmission infrastructure subject of this planning application.

2.4.2 Policy Support

The need for new gas demand flexibility measures, such as the Cashla Peaker Plant Project, is directly related to energy security and is highlighted in national planning, regulatory and power system operator policies. This is particularly emphasised in the '*Policy Statement on Security of Electricity Supply*' published by the Government in November 2021 where it states that the Government has approved that:

> *"the development of new conventional generation (including gas-fired and gasoil/distillate-fired generation) is a national priority and should be permitted and supported in order to ensure security of electricity supply and support the growth of renewable electricity generation…". (p.5)*

Planning authorities were advised through *Circular Letter PL/2021- Government Policy Statement on Security of Electricity Supply,* issued by the Government on the 10th December 2021, that where planning applications are submitted for electricity infrastructure or infrastructure that may impact on electricity supply – including for existing conventional electricity generation – that they should, until further notice, be considered in the context of the Policy Statement on Security of Electricity Supply. The National Energy Security Framework, published by the Government in 2022, further reiterated the importance of increasing the level of dispatchable electricity generation capacity significantly over the coming years in order to reliably meet the expected demand for electricity.

'Energy Security in Ireland to 2030', which was published by the Government in November 2023 as part of an Energy Security Package, outlines a new strategy to ensure energy security in Ireland for this decade, while ensuring a sustainable transition to a carbon neutral energy system by 2050. The strategy acknowledges that Ireland's current energy system presents several risks in ensuring uninterrupted availability of energy sources. Two key risks relevant to the project are supply-side risks and demand-side risks.

From a supply-side perspective, the report notes that:

> *"Supply-side risks usually occur where there is the loss of supply from production or infrastructure facilities. Potential disruptions to supply can be caused by (i) infrastructure or technical risks such as an outage of network infrastructure facilities, (ii) market risks such as expected imports being diverted to other markets due to sudden events and price responsiveness (this includes price risk rather than loss of physical supplies), and (iii) geopolitical risks such as when a key supply source becomes unavailable or significantly reduced due to global geopolitical events and/or natural disasters. As one of the most energy import dependent countries in the EU with limited diversity of supply, Ireland is*

exposed to this risk. In 2022, 82% of Ireland's energy needs came from imports. 48% of energy used in 2022 was from imported oil and nearly 31% from natural gas. 74% of Ireland's natural gas came from imports through two interconnectors from the UK." (p.8)

From a demand-side perspective, the reports states that:

"a risk can occur where there is the possibility of sudden increases in energy demand over a relatively short period of time that cannot be met by corresponding increases in supply. Demand-side risks are generally caused by weather-related events such as cold snaps or periods of low wind or a combination of these events." (p.9)

The strategy recognises that, while the supply-side risks will reduce as Ireland increases its renewable energy generation capacity, there will be an increase in demand-side risks as we transition away from fossil fuels such as coal and oil. Weather events will impact on the availability of renewables such as wind and solar power and the dependence of the electricity system on natural gas is expected to increase in the short- to medium-term, particularly at times of very low wind.

"In addition, the peak day demand for natural gas is expected to increase. This means the electricity system will continue to rely on natural gas as a fuel source as it transitions to a majority-renewables system and phases out natural gas in the medium-term." (p.9)

Taken together, national energy and climate policy establishes that additional flexible, dispatchable electricity generation is required as a matter of public interest to maintain security of supply during the transition to a renewables-led electricity system. This need is identified at national level and is not driven by local demand considerations.

The strategy document sets out a number of actions required to strengthen Ireland's Energy Security including Action 8 *'to complete the implementation of the CRU Security of Electricity Supply Programme'*. This action acknowledges the programme of work undertaken by the Commission for the Regulation of Utilities (CRU) to mitigate the risks of an identified shortfall in generation capacity in the electricity sector since the declaration of a capacity crisis in this sector in 2021. The procurement of at least 2GW of new, flexible, enduring capacity through market mechanisms is included in the CRU-led Security of Supply programme of actions under Action 8.

This target is also reflected in the latest annual Climate Action Plan published by the Government, Climate Action Plan 2025 (CAP 2025), which sets out the specific target to deliver at least 2GW of new flexible gas plant by 2030. CAP 2025, to be read in conjunction with CAP 2024, reiterates the role of flexible capacity in maintaining security of supply during the net zero transition. CAP 2024 states that:

"Considerable progress has been made in decarbonising the electricity sector, resulting in electricity emissions falling by 45% between 2001 and 2022. This was possible through the deployment of renewables and their successful integration into the electricity grid, as well as the increased use of higher efficiency gas turbines. 2021 and 2022 have seen increases in

emissions of 1.4-1.5 million tonnes when compared to 2020, as 2021 saw both a "low wind" yield and a number of outages of the lower-carbon intensity gas-fired generators, resulting in an increase in the use of coal and oil. This highlights the need to diversify our renewable electricity generation sources and increase our gas-fired generation capacity." (p.158)

The Cashla Peaker Plant project directly supports the achievement of this and, depending on the technology that is used, the turbines will have a total output capacity of either 325MW or 334MW (refer to Chapter 8: Climate of accompanying EIAR) and as such is aligned with Government policy on security of electricity supply and the transitional pathway set out in national climate and energy policy.

As set out in the letter prepared by Mason, Hayes and Curran LLP (MHC) enclosed in Appendix 2 of this planning statement, under S34(13) of the Planning and Development Act 2000 (as amended) "*A person shall not be entitled solely by reason of a permission under this section to carry out any development*" (p.2). In this regard it is important to note that the project has been allocated a capacity contract in the 2028 / 2029 T-4 Capacity Auction. As stated by MHC in the enclosed letter, the importance of the capacity contract is twofold:

"Firstly, this is an important requirement outside of planning to facilitate development…

Secondly, it is notable that the capacity auctions, run by EirGrid and SONI in their roles as Transmission System Operators in Ireland and Northern Ireland respectively, through the joint venture SEMO (Single Electricity Market Operator) were designed by the electricity regulators in Ireland and Northern Ireland to ensure sufficient capacity is secured to meet demand across the island." (p.3)

The awarding of the capacity contract to the Cashla Peaker Plant confirms that the project is deemed necessary by the electricity regulators to ensure that sufficient capacity is secured to meet demand, and there is a need for this project in line with the actions set out in the national energy security package.

The allocation of a capacity contract does not confer any planning entitlement and is not relied upon as such; rather, it is material evidence that the project forms part of the regulated framework designed to ensure sufficient generation capacity is secured to meet forecast demand.

Electricity generation and transmission infrastructure of this nature serves a strategic, national function and is not directed by local demand in the manner of conventional land uses. While national policy establishes the need for such development in principle, the suitability of the project at this location has been assessed having regard to the availability of grid and gas infrastructure and the capacity of the receiving environment to accommodate the development without giving rise to significant adverse environmental effects, as addressed in the accompanying EIAR.

3. Site Location & Context

3.1 Site Context

The Proposed Development site is located in County Galway. The proposed 220kV substation compound will be located on agricultural lands approximately 2km west of Athenry and approximately 17km northeast of Galway city centre. The proposed 220kV grid connection route is located across both greenfield lands, the public road, comprising the L7109, L71093, L7108 and L3103 local roads, and a small portion of discarded road (formerly in the public domain before the construction of the motorway) that is now under private ownership. The grid connection route will make one crossing of the M17 motorway and two crossings of the M6 motorway by way of horizontal directional drilling (refer to Figure 3.1). Residential development in the surrounding area is dispersed and generally follows the pattern of the local road network.

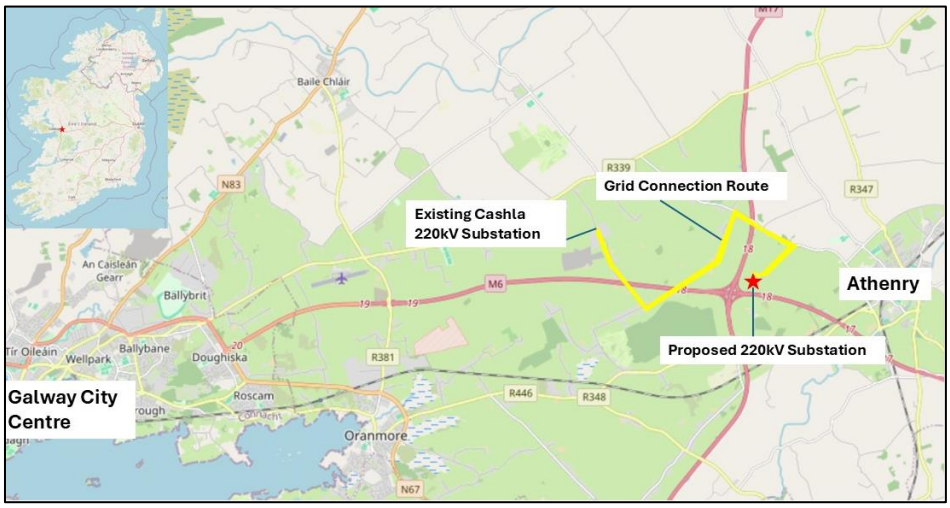

Figure 3.1 Proposed Development Site: Regional Context. Indicative route of grid connection outlined in yellow. Indicative location of substation indicated by red star. Source: MHP GIS Team

The Proposed 220kV substation compound is strategically located at the convergence of the M6, M18 and M17 motorways, within an established infrastructure corridor characterised by significant transport, gas and electricity transmission infrastructure. The presence of the M18, M17 and M6 motorways, together with existing high-voltage electricity transmission lines and proximity to national gas transmission infrastructure operated by Gas Networks Ireland (GNI), establishes the area as already characterised by strategic infrastructure.

Land use in the immediate vicinity is primarily agricultural in character, comprising fields bounded by traditional stone walls and hedgerows. However, the wider surrounding area includes a range of established industrial, infrastructural and commercial land uses. Notable developments include the existing Cashla 220kV Substation (approximately 3.4km to the west of the proposed substation), Coshla Quarry (approximately 3.5km to the

west of the proposed substation), Coffey Civil Engineering (approximately 1km to the north of the proposed substation), and extensive areas of commercial forestry (approximately 1.2km to the south). The existing Mayo-Galway gas transmission pipeline dissects the red-line boundary along the route of the grid connection and runs through the southern portion of the land parcel outside the red-line boundary of the proposed 220kV substation location (see Figure 3.2).

As stated in Section 2.4, the applicant has been allocated a capacity contract in the 2028 / 2029 T-4 Capacity Auction to connect into the existing Cashla 220kV Substation. The proximity of the existing Cashla 220kV substation and the allocation of the Capacity Contract are relevant considerations in assessing the strategic suitability of the site from a strategic location perspective. However, the suitability of the site is primarily determined by its proximity to existing transmission infrastructure and its capacity to accommodate the development without significant environmental effects, as assessed in the EIAR.

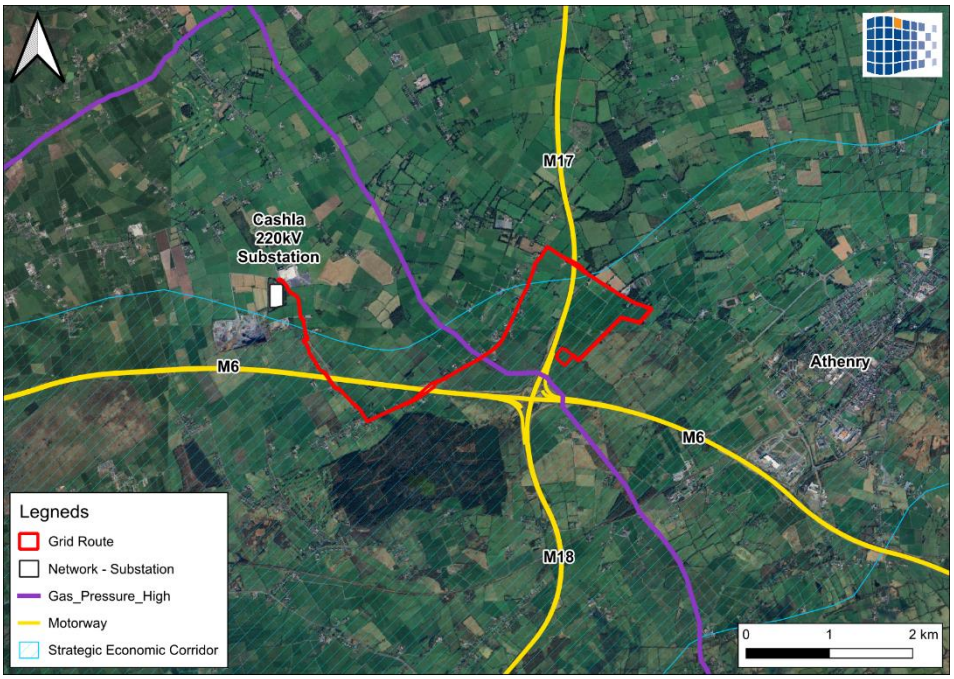

Figure 3.2 Site Context Map: Utilities and Strategic Economic Corridor Designation. Source: MHP GIS Team

3.2 Proposed Development Site

The Proposed Development site comprises an area of approximately 12.11 hectares and is located within the townlands of Rathmorrissy, Pollnagroagh, Moanbaun, Castlelambert, Knocknacreeva, Caraunduff, Caherbriskaun, Lisheenkyle East, Barrettspark, Cashla, Athenry, Co. Galway.

The site of the proposed 220kV substation compound comprises greenfield agriculture lands. The surrounding land use to the north, east and south of the proposed substation compound is primarily agricultural in nature. The closest residential dwelling is located approximately 850m to the north of the proposed substation compound.

The grid connection route traverses greenfield lands, the public road along the L7109, L71093, L7108 and L3103 local roads, and a small portion of discarded road (public domain before the construction of the motorway) that is now under private ownership. There are a number of dwellings located along the route of the grid connection corridor.

3.2.3 Strategic Economic Corridor

The Proposed Development Site is primarily located within the Oranmore and Athenry Strategic Economic Corridor (SEC), as identified in the Galway County Development Plan 2022–2028 (CDP) (refer to Figure 3.2). A small portion of the underground grid connection cable route lies outside the SEC. The SEC is designated as a regionally significant location for large-scale enterprise and industrial development and is intended to attract nationally and internationally significant investment.

The CDP recognises the corridor as a strategic infrastructure hub benefitting from the convergence of the M6 motorway, the Dublin–Galway rail line, high-capacity gas and electricity transmission networks and advanced telecommunications infrastructure. Policy EL 2 of the CDP commits to reserving and servicing lands within the SEC to international standards in order to support high-value specialist enterprise and regionally significant economic activity.

The siting of the Proposed Development within this Strategic Economic Corridor aligns with the CDP's objectives to consolidate infrastructure within established corridors and to support the economic functioning of the wider Galway Metropolitan Area. The provision of strategic electricity transmission infrastructure within the SEC will assist in underpinning enterprise activity, supporting employment growth and enhancing regional economic resilience.

3.2.4 Landscape Character

The proposed substation and a portion of the underground grid connection route will be located on grass-based agricultural land with fields enclosed by low stone wall boundaries, characteristic of the surrounding area. The remaining underground grid connection route will be located within the public road corridor and a small portion of discarded road (public domain before the construction of the motorway) that is now under private ownership. The overall site is located within a landscape categorised as the Central Galway Complex Landscape Character Type in the CDP. This Landscape Character Type is recognised as a busy working landscape in which most of Galway's settlement and agriculture, with associated roads and infrastructure, occur. The site is located within an area designated as having a low landscape sensitivity which is defined as unlikely to be adversely affected by change and is therefore capable of accommodating change of this nature.

A detailed assessment of the landscape and visual effects of the project are set out in Chapter 6 of the accompanying EIAR.

3.2.5 Built Heritage & Archaeology

The grid connection route crosses the Zone of Notification for two Records of Monument and Places (RMPs), a castle (CH019/ GA084-096001-) and an earthwork (CH020/ GA084-096002-) located within the townland of Moanbaun.

There are no entries in the National Inventory of Architectural Heritage and there are no protected structures, as set out within the CDP, located within the Proposed Development site boundary. The site is not located within an Architectural Conservation Area (ACA) however, the closest ACA is Athenry Town Centre located approximately 2km to the east.

The Proposed Development site (greenfield land) was the subject of a geophysical survey carried out under licence by Dr. Ger Dowling. Subsequent test excavation of the site was carried out under licence by Rubicon Archaeology Limited. The test excavation found that none of the anomalies identified in the geophysical survey were of archaeological significance. The 'plough trends' recorded by the geophysical survey were found to be the orientation of the underlying limestone bedrock, belonging to the Burren formation. Further interpretation, significance, and mitigation measures are addressed in Chapter 13 of the accompanying EIAR.

Figure 3.3: Archaeological Features in surrounding area. Site outlined in red. Source: MHP

3.2.6 Flood Risk

A desktop review of floodinfo.ie indicates that the subject site is not at risk of flooding. A Stage 1 Flood Risk Assessment, prepared by AtkinsRéalis, has been undertaken and can be found enclosed in Appendix 2 of the EIAR.

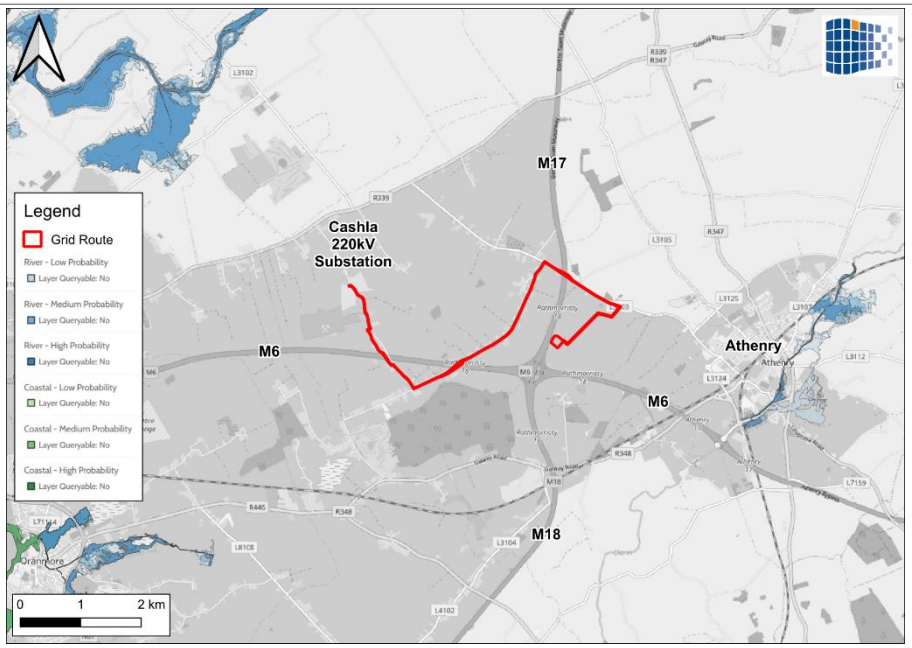

Figure 3.4 Overview of River and Coastal Flood Probability. Data from EPA Server and FloodInfo.ie. Site boundary outlined in Red. Source: MHP GIS Team

4. Planning History

4.1 Proposed Development Site

A desktop review of both Galway County Council and An Coimisiún Pleanála's online planning registers was undertaken to review planning applications within the Proposed Development site boundary. Given the nature of the proposed grid connection route which will be constructed largely within the public road corridor, planning applications within 200m of the site boundary were also reviewed to inform this planning history search. Figure 4.1 and Table 4.1 identify the planning history within the site boundary and within the immediate environs of the Proposed Development site (i.e. within 200m). Energy, Infrastructure and Manufacturing applications in the wider surrounding area are discussed further in Section 4.2.

The majority of permissions within the immediate environs of the Proposed Development site consists of agricultural and small-scale residential developments reflective of the existing land uses in the area. There is a high concentration of large-scale infrastructural planning applications surrounding the existing Cashla 220kV Substation which largely relate to refurbishments and reinforcement of the electricity transmission infrastructure at this location. There is also a concentration of large-scale infrastructural planning applications located to the south of the proposed development site.

In 2016, permission was granted for a Power Supply Development on lands located to the southwest of the subject site (An Bord Pleanála Case reference: VA0020), which included the construction of a 220 kV substation and associated works, all located on the townlands of Palmerstown, Toberroe, Rathmorrissy, Caraunduff, and Athenry. This permission has now lapsed. The proposed sub-station was to support a permitted data centre for Apple Distribution Ireland (ref. 15/488, ABP ref. PL07.245518), located to the south-west. An extension of duration of the permission was granted by Galway County Council in 2021 but the decision was quashed by the High Court. Permission on the nearby lands has therefore now lapsed.

In 2025, permission was refused for the Gannow windfarm development and associated grid connection by Galway County Council (Planning Ref. 25/61412). The decision has been appealed to An Coimisiún Pleanála (Case Ref: PL07.500493). A portion of the grid connection associated with the Gannow windfarm overlaps with the proposed grid connection route subject of this planning application and a cumulative assessment of the Gannow Windfarm has been carried out to inform the Traffic and Transport chapter of the EIAR (Chapter 10). Section 7.5.7 of this Planning Statement sets out the key traffic and transport considerations relevant to the Proposed Development and has considered the refusal reasons provided for the Gannow Windfarm, where relevant to this Proposed Development.

Table 4.1 Planning history summary within the immediate environs of the site

Planning Ref. No.	Description of Development	Decision
20/239 (Galway County Council)	Construction of a milking parlour	Granted on 17/08/2020
21/733 (Galway County Council)	To construct a 4-bay slatted shed with a calf creep. Gross floor space of proposed works: 292.56 sqm	Granted on 28/06/2021
22/60793 (Galway County Council)	Extension to dwelling and replacement of septic tank	Granted on 05/12/2022
22/60907 (Galway County Council)	to install an external S-5500 milk silo with 25,200 litres capacity	Granted on 12/12/2022
22/60533 (Galway County Council)	Construction of a new detached dwelling house, Domestic Garage and proposed effluent treatment system and percolation area and all associated site works.	Granted on 29/08/2022
22/1006 (Galway County Council)	For the development and operation of a 150 to 500 MVA (electrical rating) synchronous condenser.	Granted on 06/03/2023
23/355 (Galway County Council)	Upgrade the existing 220k overhead line between the existing Cashla 220kV Substation in the townland of Barrettspark, Co. Galway, & Tower 138 in the townland of Oughtagh, Co. Galway	Granted on 21/10/2024
23/60948 (Galway County Council)	For retention and completion of extension to Industrial Premises.	Granted on 27/06/2024
23/61460 (Galway County Council)	Ballymoneen applied for permission for amendments to 110kV electricity sub-station within an approved solar farm, and grid connection to Cashla sub-station at Grange East and other townlands, Co. Galway.	Granted on 18/03/2024
23/61172 (Galway County Council)	To erect dwellinghouse, domestic garage, wastewater treatment system, percolation area & all associated services.	Granted on 13/02/2024
24/60331 (Galway County Council)	Retention of part of agricultural shed to an office unit, and to retain treatment plant with percolation area.	Granted on 13/06/2024

24/60154 (Galway County Council)	Retention of domestic shed	Granted on 13/05/2024
25/60052 (Galway County Council)	Replacement of existing OHL circuit conductor wires, replacement and retention of towers, replacement of polesets and associated works.	Granted on 22/04/2025
25/60358 (Galway County Council)	To subdivide parents site and to construct a dwelling house and a garage with treatment plant and percolation area.	Refused on 29/05/2025
25/60880 (Galway County Council)	To extend office unit and revise site boundaries.	Granted on 26/08/2025
25/61412 (Galway County Council)	Gannow Ltd applied for a 10-year permission for a development consisting of 8 no. wind turbines; a permanent 38kV substation compound; permanent underground electrical (38kV) and communications cabling to the existing Cashla Substation; Underground electrical (20/33kV) and communications cabling connecting the wind turbines and meteorological mast; A meteorological mast with a height of 30 metres and all ancillary works and apparatus.	Refused permission by Galway County Council Appealed to ACP (Ref: PL07.500493) and decision pending.
25/61471 (Galway County Council)	Replacement of existing OHL circuit conductor wires, replacement of angle masts, replacement of polesets and associated works	Granted on 20/01/2026
26/60235 (Galway County Council)	for internal and external alterations to a dwelling house.	Lodged on 16th February 2026.
26/60282 (Galway County Council)	Construction of a single dwelling house	Lodged on 21st February 2026
ACP-324113-26 (An Coimisiún Pleanála)	Construction of an open-cycle gas turbine power plant, primarily fueled by Natural Gas, Above Ground Installation and ancillary development	Lodged on 27th February 2026

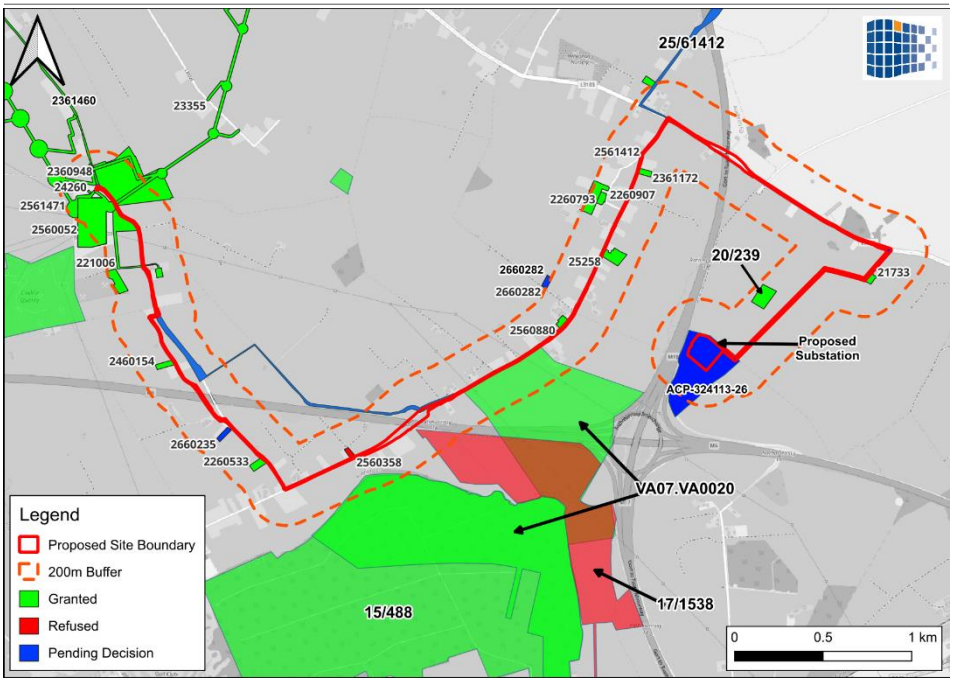

Figure 4.1 Planning History within the immediate environs of the site. Source: MHP GIS Team

4.2 Nearby Energy, Infrastructure & Manufacturing Applications

A desktop review of both Galway County Council and An Coimisiún Pleanála's online planning registers was carried out for large-scale developments within the wider surrounding area (within approximately 5km of the subject site). The review focused on energy, infrastructure and manufacturing planning applications and the relevant planning applications identified are outlined in table 4.2. The review highlights that the surrounding area has an established record of accommodating large-scale energy, infrastructure and manufacturing developments.

A review of the planning application files demonstrates that the Strategic Economic Corridor Designation, which also covers the proposed development site, supports the proposed development of nationally or regionally significant activities in this location. A detailed discussion on the principle of the proposed development is set out in Section 7 of this planning statement.

Table 4.2 Nearby Energy, Infrastructure & Manufacturing Applications

Planning Ref. No.	Description of Development	Decision
17/1538 **(Galway County Council)**	Soleirtricity applied for permission for a photovoltaic farm at Toberoe and other townlands, Co. Galway.	Refused on 13/06/2018 and appealed to ACP (Case Ref: 302034).

		Refused by ACP on 18/02/2019
17/1544 (Galway County Council)	Terra Solar II Ltd. applied for a 10-year permission for a photovoltaic farm at Shantallow & Moyveela, Co. Galway.	Granted on 11/06/2018
20/101 (Galway County Council)	C& F Tooling Ltd applied for permission for a wind turbine test site comprising - 1 12m high turbine tower with adjacent 12m high wind measuring mast and 1 20m high turbine tower with adjacent 20m high wind measurement mast.	Granted on 08/06/2020
20/961 (Galway County Council)	Renewable Energy Systems Ltd applied for permission for a period of 5 years to construct and complete a Solar PV Energy and Battery Storage development with a total site area of circa 140.9 Hectares.	Granted on 08/03/2021
310141-21 (An Coimisiún Pleanála)	Shantallow Solar Farm Ltd applied for permission for an electrical substation, 110kV and 33kV compound, underground cable (110kV) installations with associated electrical plant, equipment, control buildings and all associated works.	Granted on 17/12/2021
22/406 (Galway County Council)	Renewable Energy Systems Ltd applied for permission to construct and complete a Solar PV Energy development with a total site area of circa 25 hectares.	Refused on 05/08/2022
22/61105 (Galway County Council)	Renewable Energy Systems Ltd applied for permission to construct and complete a solar PV energy development with a total site area of circa 24.51 hectares,	Granted on 17/04/2023
22/1006 (Galway County Council)	For the development and operation of a 150 to 500 MVA (electrical rating) synchronous condenser.	Granted on 06/03/2023
23/355 (Galway County Council)	Upgrade the existing 220k overhead line between the existing Cashla 220kV Substation in the townland of Barrettspark, Co. Galway, & Tower 138 in the townland of Oughtagh, Co. Galway	Granted on 21/10/2024
23/60948 (Galway County Council)	For retention and completion of extension to Industrial Premises.	Granted on 27/06/2024
23/61460	Ballymoneen applied for permission for amendments to 110kV electricity sub-station	Granted on 18/03/2024

(Galway County Council)	within an approved solar farm, and grid connection to Cashla sub-station at Grange East and other townlands, Co. Galway.	
23/61035 (Galway County Council)	Dexcom International Ltd applied for permission for a manufacturing facility to the south of Athenry town.	Granted on 27/11/2023
25/60052 (Galway County Council)	Replacement of existing OHL circuit conductor wires, replacement and retention of towers, replacement of polesets and associated works.	Granted on 22/04/2025
25/60220 (Galway County Council)	Coshla Quarry applied for permission for the continued use of the existing quarry.	Granted Permission. Appealed to ACP and granted (Ref: ABP- 322624-25).
25/61471 (Galway County Council)	Replacement of existing OHL circuit conductor wires, replacement of angle masts, replacement of polesets and associated works	Granted on 20/01/2026
25/61412 (Galway County Council)	Gannow Ltd applied for a 10-year permission for a development consisting of 8 no. wind turbines; a permanent 38kV substation compound; permanent underground electrical (38kV) and communications cabling to the existing Cashla Substation; Underground electrical (20/33kV) and communications cabling connecting the wind turbines and meteorological mast; A meteorological mast with a height of 30 metres and all ancillary works and apparatus.	Refused permission. Appealed to ACP (Ref: PL07.500493) and decision pending.
25/61637 (Galway County Council)	to erect a 30m high telecommunications lattice structure together with antennas, dishes and associated telecommunications equipment all enclosed by security fencing	Granted – February 2026
ACP-324113-26 (An Coimisiún Pleanála)	Construction of an open-cycle gas turbine power plant, primarily fueled by Natural Gas, Above Ground Installation and ancillary development	Lodged on 27th February 2026

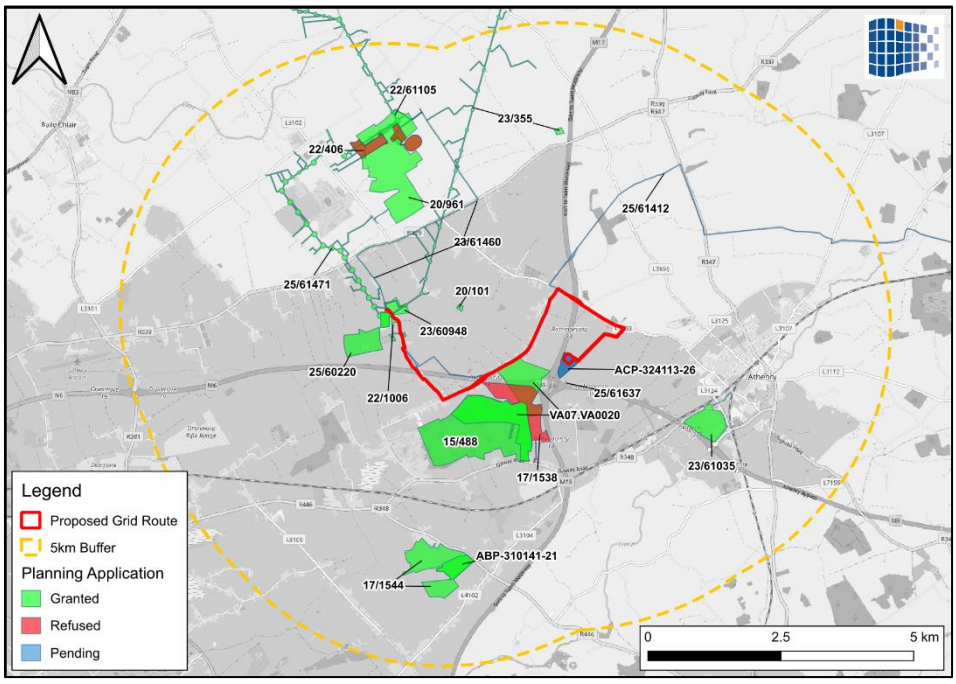

Figure 4.2 Planning History Map Energy, Infrastructure & Manufacturing Applications within 5km of the Proposed Development. Source: MHP GIS Team

The review of planning history within the wider surrounding area demonstrates that the locality has an established record of accommodating large-scale energy, infrastructure and manufacturing developments, including Strategic Infrastructure Development. While individual applications have been assessed on their merits and some have been refused, the overall pattern of decisions confirms that the area is recognised as suitable, in principle, for regionally and nationally significant infrastructure. The Strategic Economic Corridor designation further reinforces the appropriateness of the location for strategic employment and infrastructure development.

Accordingly, the planning history reinforces the established pattern of development and supports the consideration of the Proposed Development in this location.

5. Pre-Planning Consultation

5.1 An Coimisiún Pleanála

As set out in Section 1.3, the Applicant entered into consultation with the Commission in relation to the proposed 220kV Substation and 220kV Grid Connection under Case Ref: ACP-323874-25. A notice was served to the Applicant under Section 182E on the 9th of February 2026 that the Commission is of the opinion that the Proposed Development falls within the scope of Section 182A of the PDA 2000. A copy of the Commission's Opinion is included in Appendix 1 of this Planning Statement.

Matters discussed as part of the Cashla Peaker Plant pre-application consultation (Case Ref: ABP-320975-24) are also relevant to the Proposed Development having regard to the interrelationship between both elements of the project. Meetings were held with the Commission on the 20th of January 2025 and the 28th of May 2025 and a record of the meetings can be found on the Commission's website under Case Ref: ABP-320975-24. For completeness, the key planning considerations relevant to the 220kV Substation and Grid Connection discussed during these meetings are set out below.

5.1.1 Karst Features

The Commission noted that the area is karst limestone and advised that a full investigation of potential karst features including caves would be required.

Applicant Response

Chapter 11: Lands, Soils and Geology of the accompanying EIAR provides an assessment of potential effects on the lands, soils and geology within the study area, including effects on the karst landscape. This chapter provides details on the geophysical survey, geotechnical surveys and ground investigation works undertaken as part of the assessment to provide a robust understanding of the geotechnical setting. Section 7.5.4 of this Planning Statement also provides further discussion on this matter.

5.1.2 Traffic & Haul Routes

The Commission requested that the applicant confirm that the haul routes have the capacity to accommodate the delivery loads.

Applicant Response

A comprehensive assessment was undertaken on two haul route options from the Port of Galway to the proposed development site as part of the preparation of Chapter 10: Traffic and Transport of the EIAR. A structural review of 9 structures along the two route options was undertaken as part of an Exceptional Abnormal Load (EAL) assessment prepared by AtkinsRéalis (and included in Appendix 2 of the EIAR) for several large components required for the implementation of the wider project assessed in the EIAR.

The results of the analyses indicated that the load effects of the Exceptional Abnormal Loads (EAL) vehicle are less than the design load effects for each

structure, apart from one structure, which was only relevant to one of the routes. As such, this route option was ruled out, and a preferred haul route was identified for the transfer of EAL to the Proposed Development site. The preferred haul route is anticipated to originate at the Port of Galway via Lough Atalia Road (R339) before connecting directly onto the N6 (which later becomes the M6). It runs on the M6 until Exit 17 (R348) at Athenry, before turning onto Ballygarraun South Road. From Ballygarraun South Road, the route runs onto the L3103 from which access to the proposed main project site is provided. Refer to Chapter 10: Traffic and Transport and CTMP enclosed in Appendix 2 of the EIAR for further detail.

5.1.3 Grid Connection Route

The Commission queried whether a direct route for the underground cabling to the Cashla Substation along the M6 had been considered.

Applicant Response

The alternative route options for the grid connection have been assessed and are set out in detail in Chapter 3: Reasonable Alternatives of the EIAR.

5.2 Consultation with Galway County Council

Consultations were also held with Galway County Council (GCC) planning and roads authorities in relation to the Cashla Peaker Plant Project on the following dates:

- 13th of February 2025 (Planning Authority)
- 1st of April 2025 (Roads Authority)
- 28th of April 2025 (Roads Authority)
- 4th of July 2025 (Roads Authority)
- 10th of September 2025 (Roads Authority)

The key themes raised by GCC in relation to the 220kV substation and grid connection route are summarised below:

5.2.1 Traffic and Road Access

Galway County Council advised that engagement with TII and the GCC Road Section should be undertaken.

Applicant Response

Extensive engagement with the Galway County Council Roads Department was undertaken to inform this planning application and the EIAR. As set out above, four meetings were held with the Roads Department on the 1st April 2025, 28th April 2025, 4th July 2025 and the 10th September 2025. The purpose of these meetings was to discuss the Exceptional Abnormal Loads associated with the project and the proposed haul routes, understand the requirements of GCC Roads Department in terms of traffic management measures and to discuss the routing of the proposed grid connection. A summary of the key issues raised during these meetings is provided in Chapter 1 Introduction of the EIAR along with the applicant's response to where these items are addressed in the relevant chapters of the EIAR.

The Applicant consulted with TII as part of the preparation of the EIAR and Chapter 1 of the accompanying EIAR provides a summary on the consultation details.

5.2.2 Visual Impact

GCC emphasised the importance of providing detailed visual representations and mitigation strategies for the project. It was recommended that a 5km study area was used for the visual impact assessment with greater emphasis on areas within 2km of sensitive receptors. GCC requested that visuals from different perspectives, such as views from the opposite side of the motorway through the site, were included to provide a clear understanding of the overall scale.

Applicant Response

An assessment of the landscape and visual effects of the project was carried out as part of the EIAR, and further detail can be found in Chapter 6: Landscape and Visual of the EIAR. As set out in the 'study assessment and methodology' section for this chapter, the study area includes areas of land within a 3.5km radius of the centre of the proposed main project site which was identified as sufficient to enable the potential significant effects of the project on landscape character and views and visual amenity to be analysed. The Zone of Theoretical Visibility (ZTV) or areas of land from which the proposed main project site may be potentially visible were identified and mapped to inform Chapter 6. Details of the ZTV methodology can be found in Chapter 6 however in summary, the results of the study show that the proposals (in theory) give rise to ZTV area primarily located in a cluster within a 2km radius of the proposed main project site with further areas of potential visibility located outside the primary cluster especially in areas of rising topography to the north of the study area.

Twenty-four viewpoint locations were selected based on professional judgement informed by the Zone of Theoretical Visibility (ZTV) and field surveys, to represent the experience of visual receptors. The viewpoints chosen were selected to represent the different users from a range of directions and distances from the site. Sixteen of these viewpoints were visited for the purpose of preparing verified photomontage visualisation sequences, showing the existing view, Year 1 view, and Year 15 view (where relevant, when screen planting would be approximately 9 m in height), and these are illustrated in Appendix 6. The Applicant sought agreement on the viewpoint locations with the planning authority during the preparation of the EIAR, however, no feedback was received.

In terms of visual effects, Chapter 6 of the EIAR found that during the construction, operation and decommissioning phases, the Proposed Project will result in a limited number of significant residual visual effects, principally within the immediate context of the main site. Significant adverse effects would be experienced by a small number of nearby receptors where the project would introduce new elements into the landscape and partially alter some existing views. Beyond these areas, residual effects would be slight or neutral and not significant in EIAR terms. Further detail on the Landscape

and Visual impacts of the Proposed Development is set out in Section 7.5.5. of this Planning Statement and Chapter 6 of the EIAR.

5.2.3 Environmental Sensitivities

GCC noted the karst landscape in the area and the importance of providing robust mitigation measures in the application. An Appropriate Assessment (AA) screening was also requested given the proximity of the site to the Lough Corrib SAC.

Applicant Response

The applicant's response in relation to the Karst landscape is discussed further in Section 7.5.4 of this Planning Statement and is to be read in conjunction with Chapter 11: Lands and Soils of the EIAR. An AA Screening was undertaken by AtkinsRéalis as part of this planning application. Based on the findings of the AA Screening, it was determined that a Stage 2 AA was required, and a copy of the Natura Impact Statement (NIS) can be found enclosed with this planning application. The NIS concluded that there will be no residual impacts and that the Proposed Project, alone or in combination with other plans and projects, will not adversely affect the integrity of any European site.

5.2.4 Community Engagement

GCC highlighted the importance of robust community consultation for the project and recommended that in-person drop-in sessions, recorded engagement and other interactive methods to involve the community were considered as part of the applicant's approach.

Applicant Response

The Applicant has undertaken comprehensive public consultation as part of the proposed project and a detailed public consultation report has been prepared and can be found included with this application. The public consultation approach consisted of a combination of public information events, local advertisement of the public information events including posters, leaflet drops and a newspaper advertisement, publication of a non-statutory project website, briefing with elected representatives and press releases to local and regional media outlets.

Three public information events were held between May and December 2025. The first two public information events were held on Wednesday 7th May 2025 and Tuesday 13th May 2025, in the Raheen Woods Hotel, Athenry, Co. Galway to provide information on the project proposals and to invite feedback from local residents, and the wider community.

The third public information event was held on Thursday 4th December 2025 from 1pm to 8pm in the Raheen Woods Hotel, Athenry, Co. Galway to provide further information to the local community in advance of the submission of the formal planning application. These events provided an opportunity for stakeholders to learn more about the project, and to engage directly with members of the project team. A total of 184 people attended the three public information events.

To raise awareness of the non-statutory public consultation and the public information events, posters were designed and displayed in prominent locations throughout Athenry and the surrounding area. A total of 20 consultation posters were erected on local notice boards in community centres, libraries, civic buildings, and business premises in the Athenry area. Additionally, to ensure local residents and businesses were informed about the public information events, a project leaflet was prepared and distributed to approximately 320 addresses within a 2km – 3km radius of the Cashla Peaker Plant, as well as the proposed underground cable route to the Cashla 220kV substation. A newspaper advertisement was published in the Tuam Herald on Wednesday, 30th March 2025 to further promote the public information events.

To coincide with the leaflet drop and erection of consultation posters, Bord Gáis Energy issued a press release to local and regional media outlets. The press release outlined the purpose of the Cashla Peaker Plant project, its importance in supporting Ireland's energy transition and energy security, and the opportunity for the public to provide feedback.

In advance of the public information events, Bord Gáis Energy's Community Liaison Officer issued invitations to local elected representatives from Galway County Council and members of Dáil Éireann to introduce the Cashla Peaker Plant project and offer opportunities for one-to-one engagement.

In addition to the public consultation events, a dedicated, non-statutory website was launched in April 2025 to serve as a central hub for all information relating to the Cashla Peaker Plant project (www.cashlapeakerplant.ie). The website played a key role in broadening the reach of the non-statutory public consultation, particularly for those unable to attend the in-person public information events.

5.3 Consultation with Galway City Council

Consultation was undertaken with Galway City Council's roads authority to discuss the proposed haul route and associated abnormal loads. The haul route for the abnormal loads is anticipated to start at the Port of Galway and traverses through Galway City Council's jurisdiction before running into Galway County Council's jurisdiction.

It was noted that EALs require a formal permitting process distinct from the planning application consent process. The meeting clarified the key requirements for obtaining an EAL permit, including the need for robust commitments such as engaging a structural engineer who will provide indemnities and assume insurance risk related to bridge crossings.

The Roads Authority emphasised the importance of demonstrating that the bridge structures and culverts along the transport route can safely accommodate the proposed loads, and that any necessary approvals from Transport Infrastructure Ireland (TII) will be obtained.

The applicant has acknowledged these requirements and will undertake the necessary detailed structural assessments and statutory permitting procedures prior to the first abnormal load delivery. The consultation

process has therefore confirmed a clear regulatory pathway for the delivery of the turbine and generator components, subject to compliance with the abnormal load permitting regime and associated technical requirements.

6. Policy and Legal Context

This section of the Planning Statement outlines the European, National, Regional and Local planning policy and legal frameworks relevant to the Proposed Development. The Proposed Development comprises electricity transmission infrastructure required to connect a proposed natural gas-fuelled electricity generation plant (i.e. Cashla Peaker Plant) to the national grid in order to provide flexible support to Ireland's power system. While recognising that this application relates specifically to electricity transmission infrastructure this section adopts a holistic approach, considering not only the planning policy framework directly applicable to the transmission infrastructure, but also the broader policy and legislative context that supports the overall project.

For clarity, this section distinguishes between policy support for the overall Cashla Peaker Plant Project and policy support specific to the Proposed Development as electricity transmission infrastructure.

6.1 European Policy and Legal Context

Current European energy policy places strong emphasis on maintaining security of electricity supply alongside decarbonisation. As renewable generation capacity increases, the electricity system becomes more dependent on assets capable of responding quickly to fluctuations in demand and variable generation.

European policy recognises that flexible and dispatchable generation continues to play a role in safeguarding system resilience, particularly during periods of extreme weather, seasonal peak demand, and reduced renewable output. Infrastructure designed to operate at limited load factors and provide rapid response capability is therefore consistent with the objectives of ensuring a stable and reliable energy system during the transition to climate neutrality.

The recognition of transitional infrastructure reflects the understanding that the pathway to climate neutrality will require phased change, during which existing and new assets may provide essential support functions while longer-term solutions such as large-scale energy storage and renewable overcapacity continue to develop.

6.1.1 Renewable Energy Directive (RED II & III) - 2018

The Renewable Energy Directive (Directive (EU) 2018/2001) (RED II) entered into force in 2018 as part of the '*Clean energy for all Europeans*' package aimed at maintaining the EU's status as a global leader in renewables and, more broadly, helping it to meet its emissions reduction commitments under the Paris Agreement.[3] It was subsequently amended by Directive (EU) 2023/2413 (RED III) in 2023 which set an overall binding EU-wide target of at least 42.5% renewable energy consumption by 2030, but with an aspirational goal of 45%.

[3] The Paris Agreement is a 2015 international treaty under the UNFCCC aiming to limit global warming to well below 2°C, while pursuing efforts to limit it to 1.5°C.

While the REDIII focuses on increasing the proportion of energy generated from renewable sources, it also operates within a wider policy framework that recognises the need for electricity systems capable of integrating variable renewable generation. Infrastructure that supports system flexibility and reliability during periods of low renewable output or peak demand plays an enabling role in facilitating the increased deployment of renewable energy envisaged by RED III.

6.1.2 EU Green Deal – 2019

The European Green Deal, set out in the communication from the Commission of 11 December 2019 (the 'European Green Deal'), Regulation (EU) 2021/1119 of the European Parliament and of the Council, established the objective of climate neutrality in the Union by 2050 and an intermediate target of a reduction of net greenhouse gas emissions by at least 55% compared to 1990 levels by 2030.

The Union's climate neutrality objective requires an increase in energy efficiency and significantly higher shares of energy from renewable sources.

In pursuing these objectives, European policy recognises that the transition to a climate-neutral energy system must be achieved while maintaining security of supply and system resilience. Infrastructure that supports efficient system operation and manages peak demand during periods of variable renewable generation is therefore consistent with the objectives of the European Green Deal.

6.1.3 European Climate Law – 2021

The European Climate Law (Regulation (EU) 2021/1119) entered into force in July 2021, as part of the European Green Deal framework aimed at making the European Union climate-neutral by 2050.

The regulation legally binds the European Union as a whole to achieve climate neutrality by 2050, setting an intermediate target of at least a 55% net reduction in greenhouse gas emissions by 2030 relative to 1990 levels.

It establishes a legal obligation for Member States to ensure that their national legislation, policies, and measures are consistent with achieving the Union's 2030 and 2050 climate targets.

In this context, European climate policy recognises that measures to reduce greenhouse gas emissions must be accompanied by provisions that ensure the continued operability and resilience of the electricity system. Energy infrastructure that supports reliable system operation during periods of peak demand or reduced renewable generation is compatible with the objectives of the European Climate Law, provided it operates within the broader framework of emissions reduction and system transition.

6.1.4 REPowerEU

REPowerEU is a plan published by the European Commission in 2022 to phase out Europe's reliance on Russian fossil fuels by 2030. It aims to achieve this by accelerating clean energy, diversifying energy supplies, implementing energy saving measures and providing financial support.

REPowerEU places strong emphasis on improving the resilience and security of Europe's energy system through diversification of supply and the maintenance of reliable electricity infrastructure. Within this context, energy assets that support system flexibility and provide dependable capacity during periods of supply constraint or peak demand are consistent with the objectives of strengthening energy security during the transition to a lower-carbon energy system.

6.1.5 EU Electricity Market Design Reform (2024–2026)

The EU Electricity Market Design Reform, adopted in 2024 and implemented across Member States from 2025 onwards, updates the regulatory framework governing electricity markets to reflect higher penetrations of variable renewable energy. The reform places increased emphasis on security of supply, system adequacy, and flexibility, recognising that dispatchable capacity remains necessary to maintain grid stability during periods of peak demand and low renewable output.

The reformed framework supports the continued role of capacity mechanisms and flexible generation assets as part of a resilient energy system, particularly during the transition to a climate-neutral electricity sector. This policy context is relevant to the consideration of infrastructure that provides short-duration, low-load-factor generation in support of renewable integration.

6.1.6 Fit for 55 – Implementation Phase

The Fit for 55 legislative framework represents the primary mechanism for delivering the European Climate Law's binding emissions reduction targets. By 2026, the majority of Fit for 55 measures have moved from policy adoption into implementation at Member State level, including reforms affecting energy markets, emissions trading, and renewable deployment.

The framework acknowledges that achieving net-zero greenhouse gas emissions requires both rapid expansion of renewable energy and measures to ensure electricity system resilience and reliability during the transition. Within this context, energy infrastructure that supports system flexibility and peak demand management is recognised as compatible with the European Union's decarbonisation objectives.

6.2 National Policy and Legal Context

National energy and climate policy in Ireland is framed by the statutory commitment to achieve significant greenhouse gas emissions reductions while ensuring the continued security and resilience of the electricity system. The following sections set out the principal national legislative, policy, and strategic documents relevant to the delivery of a secure, flexible, and low-carbon electricity system during the transition to climate neutrality.

6.2.1 Climate Action and Low Carbon Development (Amendment) Act - 2021

The Climate Action and Low Carbon Development (Amendment) Act 2021 was introduced to amend the Climate Action and Low Carbon Development

Act 2015 to strengthen Ireland's legislative framework for climate action in response to both domestic climate policy objectives and international obligations under European and international climate agreements, including the European Climate Law (Regulation (EU) 2021/1119).

The 2021 Act legally commits Ireland to achieving a 51% reduction in greenhouse gas emissions by 2030 (relative to 2018 levels) and to reaching net-zero emissions no later than 2050.

In this context, the Act recognises that the achievement of national emissions reduction targets must be accompanied by measures that ensure the continued security and operability of the electricity system during the transition to climate neutrality.

6.2.2 Policy Statement on Security of Electricity Supply - 2021

The Policy Statement on Security of Electricity Supply sets out a number of updates to national policy in the context of the Programme for Government commitments relevant to the electricity sector, planning authorities and developers. It addresses and responds to challenges, including rising electricity demand, the planned retirement of older dispatchable generation capacity, and delays in the delivery of new flexible generation projects.

The statement confirms government approval for the development of new conventional generation (including gas-fired and gasoil/distillate-fired generation) as a national priority and should be permitted and supported in order to ensure security of electricity supply and support the growth of renewable electricity generation. The Government's approach to electricity security, as set out in the 2021 Policy Statement, has since been reaffirmed and expanded upon in the broader National Energy Security Framework (2022).

The policy statement therefore confirms that the provision of new dispatchable electricity generation capacity forms part of the Government's approach to maintaining security of supply while supporting the growth of renewable electricity generation.

6.2.3 National Energy and Climate Plan 2021 – 2030

National Energy and Climate Plans (NECPs) are the framework within which European Union Member States must set out their climate and energy objectives, targets, policies, and measures to the European Commission. Energy Security is a key priority in the NECP and the plan recognises that continuing secure supply of gas is crucial to support a highly renewable electricity system given the variability of wind and solar energy. It is a specific objective in the NECP to ensure that there is sufficient flexibility in the energy system to maintain energy security of supply and facilitate the integration and transition to clean energy sources in the most cost-effective way.

6.2.4 National Energy Security Framework - 2022

The National Energy Security Framework, published by the Department of the Environment, Climate and Communications, sets out Ireland's response to energy security challenges arising from the war in Ukraine and broader market volatility. It complements existing national and energy policies, and

establishes immediate, medium, and long-term, actions aimed at safeguarding the security of energy supply while advancing the energy transition.

While the Framework prioritises reducing dependency on imported fossil fuels through accelerated and renewable energy deployment and energy efficiency, it acknowledges that oil, gas, and coal supplies will continue to be required in the short-to medium-term to maintain energy security.

In this context, the framework recognises the critical role of natural gas in electricity generation, and the importance of maintaining sufficient dispatchable generation capacity and backup fuel capabilities during the transition period.

The framework recognises that maintaining sufficient dispatchable generation capacity, including gas-fired plant, remains necessary to safeguard energy security during the transition to a lower-carbon energy system.

6.2.5 Energy Security in Ireland to 2030

Ireland is currently one of the most energy import dependent countries in the EU, having imported 77% of its energy supply in 2021 and 82% in 2022. Energy Security in Ireland to 2030 outlines a new strategy to achieve energy security in Ireland for this decade, while ensuring a sustainable transition to a carbon neutral energy system by 2050. The strategy outlines areas where action is required to fulfil this ambition including the introduction of gas demand flexibility measures. Demand-side mechanisms developed in the gas sector will not only reduce system stress when needed, but it can also ensure Ireland is efficiently using its gas infrastructure – an important component of meeting national emissions ambitions.

The strategy also aims to ensure that all of the required policy enablers are in place for a secure transition to a renewables-led electricity sector including to complete the implementation of the CRU Security of Supply Programme. The CRU-led Security of Supply Programme includes the procurement of at least 2GW of new flexible, enduring, capacity through market mechanisms by 2030 as one of its key actions.

In this regard, the strategy identifies flexible generation and demand-side measures as key components of ensuring a secure and resilient electricity system while progressing towards a renewables-led energy mix.

6.2.6 Ireland's Long-term Strategy on Greenhouse Gas Emissions Reduction - 2024

This strategy document is the first Long-term Climate Action Strategy prepared under the Climate Action and Low Carbon Development Act 2021. This strategy recognises that in the transition to a climate neutral future, the pathway to decarbonisation must be underpinned by affordability and security in how we access and use energy, which includes the requirement for new gas-fired generation as back-up.

6.2.7 EirGrid Generation Capacity Statement

EirGrid's most recent Generation Capacity Statement identifies ongoing and forecast challenges in maintaining adequate electricity generation capacity to meet peak demand and ensure system security, particularly in the context of increasing renewable penetration, rising electricity demand, and the planned retirement of older thermal plant. The statement highlights the continued requirement for new flexible and dispatchable generation capacity to address periods of system stress and to support the reliable operation of the electricity system.

In this context, the delivery of additional flexible generation capacity is identified as a necessary component of maintaining security of supply over the coming decade, complementing renewable energy deployment and other system flexibility measures.

6.2.8 Climate Action Plan – 2025

The Climate Action Plan 2025 (CAP25), approved by the Irish Government on 15 April 2025, is the third statutory update under the Climate Action and Low Carbon Development (Amendment) Act 2021.

It reaffirms the national commitment to a 51% reduction in greenhouse gas emissions by 2030 (relative to 2018 levels) and climate neutrality by 2050. The Plan emphasises accelerated implementation across key sectors and highlights the need for a flexible and resilient electricity system to support increased renewable generation. The delivery of at least 2GW of New Flexible Gas Plant by 2030 is included as a national target within the CAP 25 alongside other renewable energy generation targets, recognising the role that flexible gas plants have to play in supporting a flexible and resilient electricity system.

The Plan therefore acknowledges that the delivery of new flexible generation capacity forms part of the policy pathway to achieving national climate targets while maintaining a resilient electricity system.

6.2.9 Revised National Planning Framework - 2025

The Revised National Planning Framework (NPF), approved by Government in April 2025, updates Ireland's long-term, spatial strategy to reflect emerging challenges including climate action targets, energy security, and infrastructure resilience. The revised framework was prepared in the context of evolving national commitments to climate neutrality by 2050, increased electricity demand projections, and heightened risks to energy supply arising from international geopolitical developments.

It places stronger emphasis on ensuring the resilience and security of Ireland's energy systems, recognising the need for fuel diversification, enhanced system flexibility, and investment in critical infrastructure.

National Strategic Outcome (NSO 8) 'Transition to a Low Carbon and Climate Resilient Society' is the main NSO relevant to the Proposed Development. It recognises the need to:

Reinforce the distribution and transmission network to facilitate planned growth and distribution of a more renewables focused source of energy across the major demand centres.

Chapter 9 of the revised NPF 'Climate Transition and Our Environment' recognises the need to accelerate action on climate change to enable our transition to a climate neutral energy future. In this regard National Policy Objective 69 seeks to:

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

The framework acknowledges the transitional role of natural gas in supporting energy security. On page 132, it states:

Gas will continue to play a key role to support the secure transition to an energy system, based on electrification and greatly increased renewables penetration.

6.2.10 National Development Plan 2021– 2030

The National Development Plan (NDP) was published by the Government of Ireland as the capital investment strategy underpinning Project Ireland 2040. It was prepared to align public infrastructure investment with the objectives of the NPF, including balanced regional development, climate action and economic resilience.

The NDP commits to over €165 billion in capital investment across sectors, with major funding allocated to energy infrastructure, including the electricity grid, renewable energy integration, and system resilience measures. The NDP outlines that ensuring continued security of energy supply is considered a priority at national level and within the overarching EU policy framework in which the Irish energy markets operate. In the short-to-medium-term, conventional (mainly gas-fired) electricity generation capacity is noted as being critical to support the operation of the electricity system and to provide security of supply for when variable generation (wind/solar) is not sufficient to meet demand. In this regard, the NDP states that circa 2 GW of new conventional electricity generation capacity will need to be delivered over the course of the coming decade with much of this needed by mid-decade.

The NDP was reviewed in 2025 and features annual sectoral capital allocations from 2026-2030 and overall capital expenditure ceilings to 2035. The review process and substantive capital allocations provided within the document were driven by a number of key factors, including climate. The revised document acknowledges that to achieve the targets set out in the Climate Action and Low Carbon Development (Amendment) Act 2021 and the policies and measures set out in the CAP 2025, significant capital investment is required. Importantly, it also notes that public investment alone will not be sufficient to reach these goals and that private investment is required along with the use of other key policy levers, such as well-designed regulatory

measures, taxation, education and behavioural change programmes to further climate action.

This policy context establishes the need for the overall project, while the following sections address the policy support for the Proposed Development.

6.3 Regional Policy Context

Regional policy provides the spatial and strategic framework through which national planning and energy objectives are implemented at regional level. The following section outlines the relevant regional policy context, the Regional Spatial and Economic Strategy, which supports the delivery of critical energy infrastructure and the transition to a low-carbon and resilient energy system

6.3.1 Regional Spatial and Economic Strategy (RSES) for the Northern and Western Region 2020 – 2032

The Regional Spatial and Economic Strategies (RSES) were prepared by the regional assemblies to support the implementation of the NPF and the economic policies and objectives of Government by providing a long-term strategic planning and economic framework for the development of the region. It seeks to determine at a regional scale how best to achieve the shared goals set out in the National Strategic Outcomes of the NPF.

The RSES for the Northern and Western Region 2020-2032, within which the Proposed Development is situated, includes several policy measures aimed at supporting the development and reinforcement of the electricity grid, the expansion delivery and expansion of natural gas infrastructure throughout the region, promoting the transition to a low-carbon economy, and enabling the transfer of electricity generated from renewable sources. These are outlined in Regional Policy Objectives (RPOs) 8.1, 8.2, 8.3, 8.4 and 8.6:

> *RPO 8.1 - The Assembly support the development of a safe, secure and reliable electricity network and the transition towards a low carbon economy centred on energy efficiency and the growth projects outlined and described in this strategy*
>
> *PO 8.2 Support the reinforcement and strengthening of the electricity transmission network with particular reference to the regionally important projects contained within Table 11.*
>
> *RPO 8.3 - The Assembly support the necessary integration of the transmission network requirements to allow linkages with renewable energy proposals at all levels to the electricity transmission grid in a sustainable and timely manner.*
>
> *RPO 8.4 That reinforcements and new electricity transmission infrastructure are put in place and their provision is supported, to ensure the energy needs of future population and economic expansion within designated growth areas and across the region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs. Ensure that development minimises impacts on designated areas.*

RPO 8.6 Facilitate the delivery and expansion of natural gas infrastructure throughout the region and have regard to the location of existing gas infrastructure in assessing potential developments.

Collectively, these Regional Policy Objectives support the provision of electricity and gas infrastructure required to ensure a secure, resilient, and low-carbon energy system at regional scale.

6.4 Local Planning Context

The local planning context is set by the Galway County Development Plan 2022–2028 (CDP), which provides the statutory framework for land use, infrastructure delivery, environmental protection, and climate action at county level. The following section outlines the relevant provisions of the CDP that apply to the site and to the assessment of strategic energy and infrastructure development.

6.4.1 Galway County Development Plan 2022 – 2028

The CDP is informed by the projected population and economic growth targets set out in the National Planning Framework (NPF) and the Northern and Western Regional Spatial and Economic Strategy (RSES). It reflects the county's ambition for sustainable development by aligning growth with the delivery of essential infrastructure.

The plan also aligns with the Galway County Council Local Authority Renewable Energy Strategy (LARES) 2022, which recognises Galway's significant contribution to Ireland's renewable energy generation - producing approximately 11% of national wind energy capacity. Both the CDP and LARES acknowledge the key role that the gas network plays as part of the supporting infrastructure for renewable energy developments and the CDP states that "*gas will play an important part of Ireland's energy economy for the foreseeable future.*"

Chapter 5: Economic Development, Enterprise and Retail Development

Chapter 5 of the CDP identifies key locations for employment and enterprise growth alongside its network of towns and villages. The overarching policy objective for this chapter is:

To develop and build on the economic strengths and assets of the county as a thriving, competitive and attractive place for a range of sectors to locate, based on the principles of a well-established economic base that is highly appealing to both investors and employees.

Central to this strategy is the Oranmore Strategic Economic Corridor (SEC), stretching from Oranmore to Athenry in which the proposed development is located (refer to Figure 3.2 of this planning statement).

Recognised in the Regional Spatial and Economic Strategy (RSES), Galway is positioned for compact, connected and inclusive growth as a competitive location for both people and businesses. The CDP notes that the SEC is aligned with the Galway – Dublin railway and the M6 motorway and benefits from high accessibility and established infrastructure, making it a prime area for investment.

The following policy objective relates to the Strategic Economic Corridor Designation:

EL 2 Strategic Economic Corridor: In relation to the Strategic Economic Corridor the Planning Authority will take steps to:

- *Reserve lands to support nationally and regionally significant activities and to attract specialist enterprise development that is large scale of high value;*
- *Facilitate opportunities for employment and technology-based uses;*
- *Ensure that development is compatible with the enhancement, preservation and protection of the environment and cultural resources recognised within the corridor;*
- *Identify sites of adequate size and location to accommodate necessary infrastructure or support activities which would not be appropriate in proximity to centres of population or sensitive environments or environmentally sensitive economic activities;..*

Chapter 6: Transport and Movement

Chapter 6 of the CDP recognises the critical role of national roads which serve as key elements of the county's strategic transport network. These roads support regional accessibility, economic development, and connections to the wider Atlantic Economic Corridor and Dublin. Policy objectives for national roads aim to protect the carrying capacity, safety and strategic function of these corridors by ensuring development proposals do not compromise their performance.

The following policy objectives are of relevance to the proposal:

NR 1 Protection of Strategic Roads: To protect the strategic transport function of national roads and associated national road junctions, including motorways through the implementation of the 'Spatial Planning and National Roads Guidelines for Planning Authorities' DECLG, (2012) and the Trans-European Networks (TEN-T) Regulations.

NR 3: Traffic and Transport Assessment (TTA) and Road Safety Audit (RSA): Require all applications for significant development proposals which have the potential to impact on the National Road Network to be accompanied by a Traffic and Transport Assessment (TTA) and Road Safety Audit (RSA), carried out by suitably competent persons, in accordance with the TII's Traffic and Transport Assessment Guidelines and TII Publications (Standard) GE-STY-01024 (Road Safety Audit) respectively.

NNR 2 Safeguard Regional and Local Roads: To safeguard the carrying capacity and safety of the County's regional and local road network.

The routing of the underground grid connection within the public road corridor, where feasible, is consistent with the protection of the strategic function and safety of the road network.

Chapter 7: Infrastructure, Utilities and Environmental Protection

Chapter 7 of the CDP sets out the strategic objectives for the sustainable provision and enhancement of infrastructure and utility services across the county. Chapter 7 of the CDP has the overarching objective to:

> *"support and encourage investment and improvement in utilities, water, wastewater, electricity and gas infrastructure and support the development and enhancement of digital infrastructure."*

The CDP further recognises that

> *"a strong electricity infrastructure and transmission grid is essential for the county in order to attract and retain high-tech industrial investment, to ensure competitive energy supplies, to achieve balanced development, to reduce dependency on fossil fuels, and to achieve climate change targets".*

The following policy objectives are relevant to the Proposed Development:

> *EG 1 Enhancement of Electricity Infrastructure: Support and promote the sustainable improvement and expansion of the electricity transmission and distribution network that supply the County, while taking into consideration landscape, residential, amenity and environmental considerations.*
>
> *EG 2 Delivery of Electricity and Gas Infrastructure Support the provision and extension of electricity and gas transmission networks within the county which are critical to the economic development of the County subject to environmental quality, landscape, wildlife, habitats or residential amenity.*
>
> *EG 3 Power Capacity: To support and liaise with statutory and other energy providers in relation to power generation, in order to ensure adequate power capacity for the existing and future needs of the County.*
>
> *EG 4 Ireland's Grid Development Strategy Support the implementation of Ireland's Grid Development Strategy, while taking into account landscape, residential, amenity and environmental considerations.*

These policies directly support the provision of electricity transmission infrastructure of the nature proposed. In particular, the Proposed Development constitutes transmission infrastructure required to facilitate connection to the national grid, consistent with the CDP's support for grid reinforcement and network expansion.

> *ICT 8 Underground Cabling To co-operate with the relevant agencies to facilitate the undergrounding of all electricity, telephone and television cables in all environments, wherever possible, in the interests of visual amenity subject to fish and fisheries habitat considerations, especially where watercourse crossings are involved. Where undergrounding of cables is being pursued, proposals should demonstrate that environmental impacts including the following are minimised:*

• Habitat loss as a result of removal of field boundaries and hedgerows (right of way preparation) followed by topsoil stripping (to ensure machinery does not destroy soil structure and drainage properties);

• Short to medium term impacts on the landscape where, for example, hedgerows are encountered;

• Impacts on underground archaeology;

• Impacts on soil structure and drainage; and

• Impacts on surface waters as a result of sedimentation.

The use of underground cabling for the grid connection is consistent with the objectives of ICT 8 and represents an appropriate design response in minimising landscape and visual impacts.

The CDP recognises the importance of maintaining high air quality standards to protect public health and the environment. Poor air quality is linked to significant environmental and health impacts, particularly in built-up areas and near major transport routes.

The following policy objectives are relevant to air quality management within the County:

AQ 1 Ambient Air Quality: To promote the preservation of best ambient air quality compatible with sustainable development in accordance with the EU Ambient Air Quality and Cleaner Air for Europe (CAFÉ) Directive (2008/50/EC) and ensure that all air emissions associated with new developments are within Environmental Quality Standards as set out in the Air Quality Standards Regulations 2011 (SI No. 180 of 2011) (or any updated/superseding documents).

AQ 2 Assessment of Air Quality: To require developments which would have the potential to have adverse impacts on air quality to carry out assessments of the impact of the development on air quality.

AQ 3 Air Quality Mitigation Measures: To require the use of appropriate mitigation measures such as dust dampeners to minimise the potential impacts of developments on air quality

The CDP recognises that environmental noise is a significant issue that can impact human health, quality of life, and the natural environment. Galway County Council has prepared the Galway County Council Noise Action Plan 2024–2028, in accordance with its statutory obligations under the Environmental Noise Regulations. The Action Plan focuses on major transport corridors, but the CDP also sets out general policy objectives to ensure new developments mitigate potential noise impacts at the planning and operational stages.

The following noise-related policies are of relevance:

NP 1 Galway County Council Noise Action Plan 2019-2023: To implement the Galway County Council Noise Action Plan 2019-2023 (and any subsequent Plan) in order to avoid, prevent and reduce the harmful effects, including annoyance, due to environmental noise exposure.

NP 2 Developments within Noise Maps (Noise Action Plan 2019-2023): To require that where new developments are proposed within the noise limits of the noise maps for the designated sections of roads in the County, appropriate mitigation measures are undertaken so as to prevent harmful effects from environmental noise.

NP 3 Noise Impact Assessments: To require an assessment of impact of the development on noise levels, having regard to the provisions of the Environmental Protection Agency Acts 1992 and 2003 and the EPA Noise Regulations 1994 when assessing planning application.

NP 4 Noise Pollution and Regulation: Restrict development proposals causing noise pollution in excess of best practice standards and regulate and control activities likely to give rise to excessive noise, other than those activities which are regulated by the EPA.

NP 5 Noise Mitigation Measures Require activities likely to give rise to excessive noise to install noise mitigation measures and monitors. The provision of a noise audit may be required where appropriate.

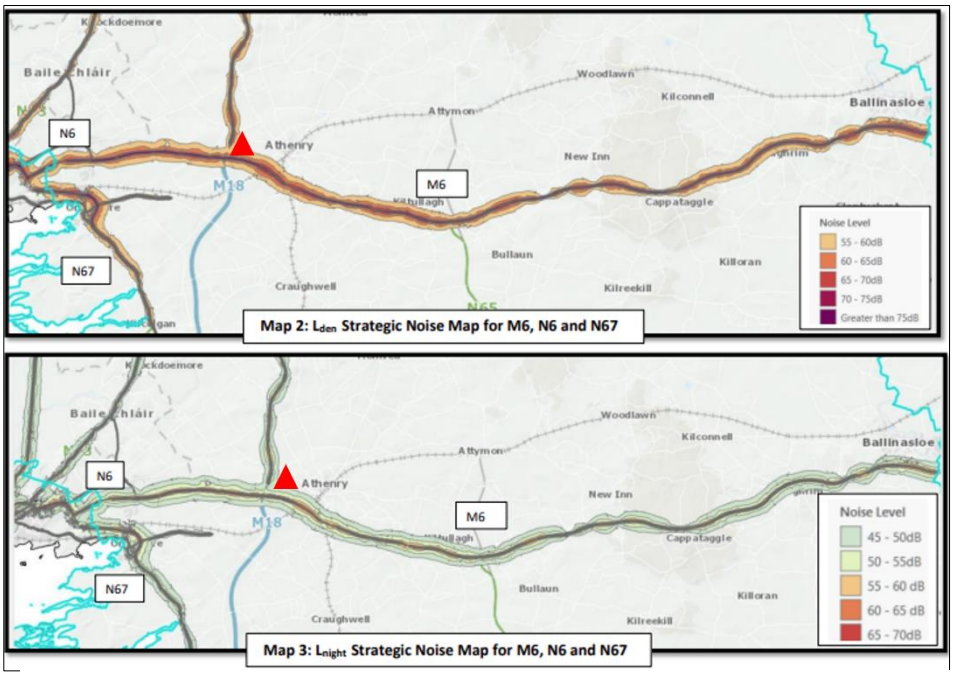

Figure 6-6.1: Strategic Noise Maps. Map source: Galway County Council Noise Action Plan 2024 - 2028. Approximate site location identified by red icon.

Chapter 7 of the CDP recognises the importance of controlling light pollution in order to protect residential amenity, nature conservation, visual quality, road safety, and energy efficiency. While acknowledging the necessity of artificial lighting for safety and security, the Plan places emphasis on minimising excessive light spillage and maintaining dark skies in rural areas. The following policy objectives are of relevance:

LP 1 Lighting Schemes: To require that all developments shall ensure lighting schemes are designed so that excessive light spillage is minimised to ensure light pollution in the surrounding environment including

residential amenity, wildlife and near public roads is limited. Such lighting schemes shall be submitted and agreed with the Planning Authority.

LP 2 Lighting and Climate Action: To require the use of low energy LED (or equivalent) lighting in support of Climate Action.

LP 3 Dark Skies: To encourage the maintenance of dark skies in rural areas and to limit light pollution in urban and rural areas.

Chapter 8 Tourism and Landscape

Chapter 8 of the CDP highlights the importance of Galway's Landscapes and recognises them as one of the key attributes within the County. The chapter notes that the Council aims to support sustainable development at appropriate locations throughout the county whilst also protecting the landscapes from inappropriate developments.

The site lies within the Central Galway Complex Landscape designation which has a low-class sensitivity attributed to it. The low sensitivity is noted in the CDP as being unlikely to be adversely affected by change. The following policy objects are relevant to the proposed development:

LCM 2 Landscape Sensitivity Classification: The Planning Authority shall have regard to the landscape sensitivity classification of sites in the consideration of any significant development proposals and, where necessary, require a Landscape/Visual Impact Assessment to accompany such proposals. This shall be balanced against the need to develop key strategic infrastructure to meet the strategic aims of the plan.

LCM 4 Open/Unfenced Landscape: Preserve the status of traditionally open/unfenced landscape. The merits of each case will be considered in light of landscape sensitivity ratings and views of amenity importance.

Chapter 10 Natural Heritage, Biodiversity and Green/Blue Infrastructure

Chapter 10 sets out how the CDP will contribute towards the protection and enhancement of biodiversity and natural heritage including sites designated on a national and EU Level and protected species and habitats outside of designated ecological sites within the County.

The following Policy Objectives are relevant to the Proposed Development:

NHB 2 European Sites and Appropriate Assessment: To implement Article 6 of the Habitats Directive and to ensure that Appropriate Assessment is carried out in relation to works, plans and projects likely to impact on European sites (SACs and SPAs), whether directly or indirectly or in combination with any other plan(s) or project(s). All assessments must be in compliance with the European Communities (Birds and Natural Habitats) Regulations 2011. All such projects and plans will also be required to comply with statutory Environmental Impact Assessment requirements where relevant.

NHB 4 Ecological Appraisal of Biodiversity: Ensure, where appropriate, the protection and conservation of areas, sites, species and ecological/networks of biodiversity value outside designated sites. Where appropriate require an ecological appraisal, for development not directly

connected with or necessary to the management of European Sites, or a proposed European Site and which are likely to have significant effects on that site either individually or cumulatively.

NHB 9 Protection of Bats and Bats Habitats: Seek to protect bats and their roosts, their feeding areas, flight paths and commuting routes. Ensure that development proposals in areas which are potentially important for bats, including areas of woodland, linear features such as hedgerows, stonewalls, watercourses and associated riparian vegetation which may provide migratory/foraging uses shall be subject to suitable assessment for potential impacts on bats. This will include an assessment of the cumulative loss of habitat or the impact on bat populations and activity in the area and may include a specific bat survey. Assessments shall be carried out by a suitably qualified professional and where development is likely to result in significant adverse effects on bat populations or activity in the area, development will be prohibited or require mitigation and/or compensatory measures, as appropriate. The impact of lighting on bats and their roosts and the lighting up of objects of cultural heritage must be adequately assessed in relation to new developments and the upgrading of existing lighting system

Chapter 12: Architectural, Archaeological and Cultural Heritage

Chapter 12 of the CDP sets out the policy framework for the protection, conservation, and management of the county's archaeological, architectural, and cultural heritage. The CDP recognises that archaeological heritage includes structures, groups of structures, sites, features, or portable objects and their context, located above and below ground, on land or underwater, and includes areas with potential for such remains. The Record of Monuments and Places (RMP), maintained under the National Monuments Acts 1930-2014, identifies protected archaeological sites within the County. All planning applications in the vicinity of known or suspected archaeological sites are required to take account of these designations and the archaeological potential of the site. Development proposals within or near an RMP site or Zone of Archaeological Potential (ZAP) must be accompanied by an archaeological impact assessment.

The following policy objectives are of relevance:

ARC 1 Legislative Context: Support and promote the preservation, conservation and appropriate management and enhancement of the County's archaeological sites and monuments, together with the settings of these monuments, having regard to the legislative, statutory and policy provisions relevant to the conservation of the archaeological heritage.

ARC 4 Protection of Archaeological Sites: Protect archaeological sites and monuments their settings and visual amenity and archaeological objects … that are listed in the Record of Monuments and Places, in the ownership/guardianship of the State, or that are subject of Preservation Orders or have been registered in the Register of Historic Monuments, or that are newly discovered and seek to protect important archaeological landscapes.

ARC 5 Development Management: All planning applications for new development, redevelopment, any ground works, refurbishment, and restoration, etc. within areas of archaeological potential or within close proximity to Recorded Monuments or within the historic towns of County Galway will take account of the archaeological heritage of the area and the need for archaeological mitigation.

ARC 9 Recorded Monuments: Ensure that any development in the immediate vicinity of a Recorded Monument is sensitively designed and sited and does not detract from the monument or its visual amenity.

Chapter 14: Climate Change, Energy and Renewable Resource.

Chapter 14 of CDP outlines Galway County Council's commitment to addressing climate change through an integrated policy approach encompassing both mitigation and adaptation. Chapter 14 of the CDP has the overarching objective to:

Reduce the carbon footprint by integrating climate action into the planning system in support of national targets, support indigenous renewable sources in order to reduce dependence on fossil fuels and improve security of supply and the move to a competitive low carbon economy.

The following policy objectives are relevant to the Proposed Development:

CC 1 Climate Change: Support and facilitate the implementation of European, National and Regional objectives for climate adaptation and mitigation taking into account other provisions of the Plan (including those relating to land use planning, energy, sustainable mobility, flood risk management and drainage) and having regard to the Climate mitigation and adaptation measures.

CC 2 Transition to a low carbon, climate-resilient society: It is a policy objective of the Planning Authority to support the transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050, by way of reducing greenhouse gases, increasing renewable energy, and improving energy efficiency.

CC 8 Climate Action and Development Location: To implement, through the plan and future local areas plans, policies that support and encourage sustainable compact growth and settlement patterns, integrate land use and transportation, and maximise opportunities through development location, form, layout and design to secure climate resilience and reduce carbon dioxide and greenhouse emissions.

CC 9 Mainstreaming Climate Change Adaptation: Galway County Council shall incorporate climate change adaptation into land use planning, building layouts, energy, transport, natural resource management, forestry, agriculture and marine waters.

Chapter 14 of the CDP sets out the strategic objectives for managing flood risk within the county, aligned with national and European legislative frameworks. The following policy objectives are relevant to the proposed development:

FL 8 Flood Risk Assessment for Planning Applications and CFRAMS: Protect Flood Zone A and Flood Zone B from inappropriate development and direct developments/land uses into the appropriate Flood Zone in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 (or any superseding document) and the guidance contained in Development Management Standard 68.

Site-specific Flood Risk Assessment (FRA) is required for all planning applications in areas at elevated risk of flooding, even for developments appropriate to the particular flood zone.

The detail of these site-specific FRAs will depend on the level of risk and scale of development. A detailed site-specific FRA should quantify the risks, the effects of selected mitigation and the management of any residual risks. The Planning Authority shall have regard to the results of any CFRAM Studies in the assessment of planning applications.

Development proposals will need to be accompanied by a Development Management Justification Test in addition to the site-specific Flood Risk Assessment. Where only a small proportion of a site is at risk of flooding, the sequential approach shall be applied in site planning, in order to seek to ensure that no encroachment onto or loss of the flood plain occurs and/or that only water compatible development such as Open Space would be permitted for the lands which are identified as being at risk of flooding within that site.

In Flood Zone C, where the probability of flooding is low (less than 0.1%, Flood Zone C), site-specific Flood Risk Assessment may be required and the developer should satisfy themselves that the probability of flooding is appropriate to the development being proposed.

In addition to the County Plan SFRA datasets (including the Flood Zones, CFRAMS mapping, historical and predictive groundwater mapping, predictive pluvial mapping and historical flood risk indicator mapping, such as the Benefitting Lands mapping), new and emerging datasets (such as the OPW's National Fluvial Mapping that will supersede existing PFRA fluvial mapping for catchments greater than 5km2) must be consulted by prospective applicants for developments and will be made available to lower-tier Development Management processed in the Council. Applications for developments in coastal areas and associated assessments shall also consider wave overtopping and coastal erosion.

FL 11 FRA and Environmental Impact Assessment (EIA): Flood risk may constitute a significant environmental effect of a development proposal that in certain circumstances may trigger a sub-threshold EIA. FRA should therefore be an integral part of any EIA undertaken for projects within the County.

Section 14.7 sets out the policy objectives relating to Energy and Renewable Resource and recognises that

"An efficient and secure energy supply is essential to the future growth and sustainable development of County Galway."

In this regard, the Energy Expectation for Galway for the plan period identifies that there will be a reduction in demand for non-renewable energy sources, such as coal and oil, as well as an increased demand for electricity from all sectors, leading to more sustainable energy usage across the county and that natural gas will continue to have a role to play in the transition to a low carbon economy.

Section 14.7.3. further states that

> *"The de-carbonisation of the economy will require a significant increase in the provision of a secure and adequate electricity infrastructure to meet the growth in demand and to ensure that an efficient and reliable electricity supply is available to households, business and industry. A strong transmission grid is essential to attract and retain industrial investment, to ensure competitive energy supplies, to achieve balanced development, to reduce dependency on fossil fuels, and to achieve climate change targets."*

The Proposed Development forms part of such transmission infrastructure and contributes to the delivery of a secure and resilient electricity network at county and regional level.

The role of gas in the path to decarbonisation is recognised in the CDP where is states that:

> *"The Gas network plays a key role as part of the supporting infrastructure for renewable energy developments. Gas will play an important part of Ireland's energy economy for the foreseeable future. Even with a clear move towards renewable energy in the growing electricity sector, Ireland is likely to rely on natural gas for about one-third of electricity generation in 2030 to support the transition to a low carbon economy"*

The following policy objectives are of relevance to the Proposed Development:

> *EG 1 Gas Network and Generating Capacity: To support the development of the gas network and associated generating capacity in order to sustainably support and augment renewable electrical energy generated in County Galway.*
>
> *EG 2: Electricity Transmission Networks:*
>
> *(a) To support the development of the transmission grid network in order to sustainably accommodate both consistent and variable flows of renewable energy generated in County Galway…*
>
> *(b) Proposed renewable energy generation projects shall fully consider the capacity of the existing transmission grid network in determining the optimal grid connection for the project, in accordance with the proper planning and sustainable development of the area.*
>
> *(c) In respect of proposed renewable energy developments, transmission grid capacity should be considered as a*

constraint where the Transmission Development Plan, or any other equivalent plan of the TSO, does not identify infrastructure reinforcement measures unless transmission grid capacity can be demonstrated.

(d) Notwithstanding ecological and environmental considerations, grid connection routing for development proposals should show all alternative routes that were considered, and should avoid materially impacting the road network, where possible. Undergrounding should be considered where it will significantly negate any identified impacts.

(e) It is important that the necessary transmission and distribution infrastructure is facilitated and put in place in order to maximise the renewable energy potential of County Galway. Liaison with Eirgrid, as a TSO, and alignment with their transmission plans and strategies will be of vital important in this respect

EG3 Natural Gas and Synthetic Networks: To facilitate the delivery and expansion of the Natural Gas and Synthetic Gas infrastructure for storage, transmission and energy generation throughout the County for both domestic and business/industry use and to have regard to the location of existing gas infrastructure pipeline in the assessment of planning applications

RE1 Renewable Energy Generation and ancillary facilities: To facilitate and support appropriate levels of renewable energy generation and ancillary facilities in the county to meet national, regional and county renewable energy targets, to facilitate a reduction in CO2 emissions and the promotion of a low carbon economy.

RE 2 Local Authority Renewable Energy Strategy: The policy objectives and Development Management Standards set out in the Local Authority Renewable Energy Strategy for County Galway shall be deemed the policy objectives and development management standards for the purpose of the Galway County Development Plan 2022-2028.

Taken together, the provisions of the Galway County Development Plan support the delivery of critical energy and infrastructure development at appropriate locations, subject to environmental protection, amenity considerations, and compliance with development management standards.

Accordingly, the CDP provides clear policy support for the delivery of electricity transmission infrastructure required to facilitate connection to the national grid, subject to environmental and amenity considerations.

6.4.2 County Galway Local Authority Renewable Energy Strategy (LARES) 2022

The County Galway Local Authority Renewable Energy Strategy (LARES), as outlined in Appendix 1 of the Galway County Development Plan 2022–2028

(GCDP), is a strategic framework developed to guide the county's transition towards sustainable energy sources.

The LARES was prepared to replace the previous Wind Energy Strategy from the GCDP 2015-2021, ensuring alignment with updated national and regional policies. The document provides specific policy objectives and development management standards related to renewable energy.

While the key focus of the strategy is renewable energy, it recognises that the development of a proper functioning renewable energy system requires good quality supporting infrastructure. The strategy states that:

> *"It must also be recognised that natural gas, particularly renewable and Indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand. Indeed, there are aspects of bioenergy developments that generate renewable gas such as biogas which needs to be appropriately dispersed in the transmission network. Therefore, the gas network plays a key role as part of the supporting infrastructure for renewable energy developments"*

In this context, the Local Authority Renewable Energy Strategy recognises that supporting infrastructure, including the gas network, continues to play a role in enabling the effective integration and operation of renewable energy systems during the transition to a low-carbon energy framework.

6.4.3 Athenry Local Area Plan 2024 – 2030

The proposed development is located outside the settlement boundary for Athenry and is therefore outside the boundary of the Athenry Local Area Plan (LAP) however due to the scale of the project and its proximity to Athenry, relevant policy objectives of the LAP have been considered as part of this planning application. The LAP sets out the overall Development Strategy and Planning Policy Objectives for the town and seeks to provide medium-term planning and development benefits for Athenry.

As defined in the RSES and the GCDP 2022-2028, Athenry now forms the eastern focus point of the Strategic Economic Corridor. The LAP recognises the importance of the Economic Corridor from Oranmore to Athenry to attract further investment building on the existing strategic location and infrastructure. Paragraph 2.4 of the LAP states that it is a key objective to promote Athenry as a destination for business, growing the economy to a scale appropriate to its strategic location.

Within the Athenry Plan Area there is a designated Architectural Conservation Area (ACA). An ACA is a place, area, group of structures or townscape, which is of special architectural, historical, archaeological, artistic, cultural, scientific, social, or technical interest. The LAP sets out that:

> *"the fundamental significance of Athenry ACA is its degree of survival as a medieval fortified town, which includes a number of fine monuments and Archaeological Heritage and/or Archaeological Objects. This historic function is visible in the street plan, land sizes, buildings,and*

architectural coherence. The majority of structures date from the late 19th Century and share many characteristics. Traditional shop fronts that have been retained are key features. The open fields and pastures within the walls are of the utmost significance. The form, attractiveness, and originality of the town as a whole are of international significance and have the potential to attract a larger cultural audience."

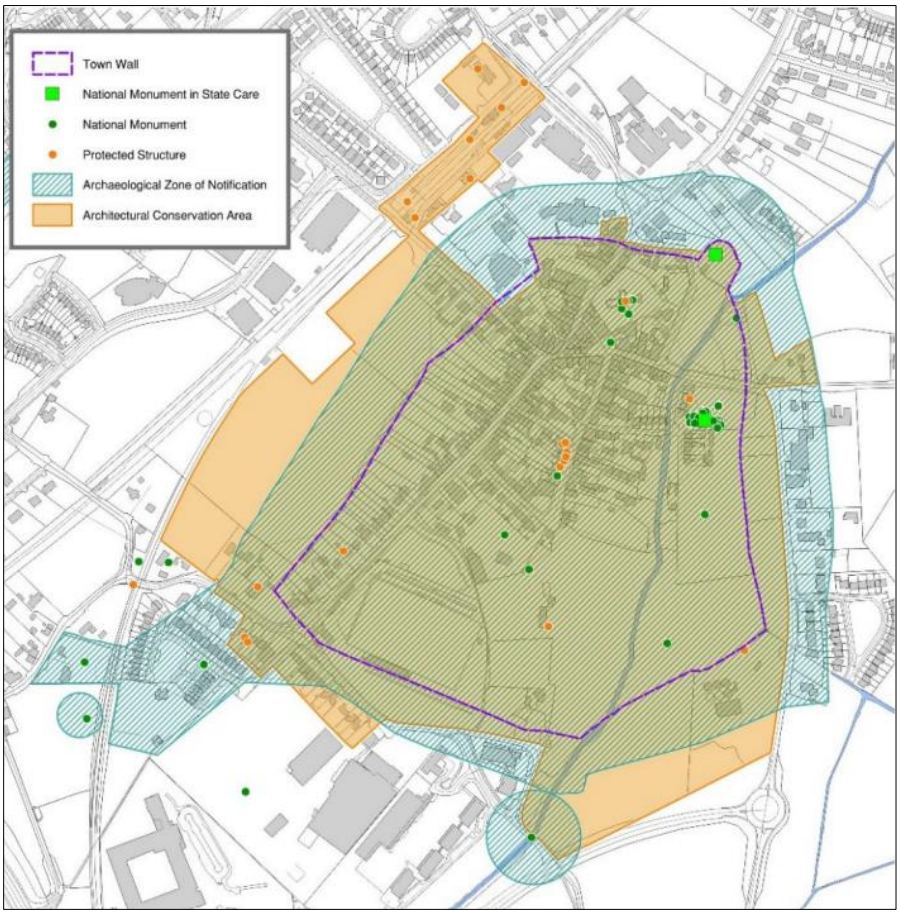

Figure 6.2: Athenry Architectural Conservation Area shown in orange. Map Source: Athenry Local Area Plan 2024 - 2030.

Although the Proposed Development is located outside the LAP boundary, the presence and proximity of the ACA and the scale of the Proposed Development were considered to inform this planning statement. The following policy objective is relevant to the Proposed Development:

ASP 40 – Architectural Conservation Areas: Protect, conserve and enhance the essential character of the Athenry Architectural Conservation Areas (ACAs) through the appropriate management and control of the design, location and layout of new development, respecting surviving historic plots and street patterns, alterations or extensions to existing structures, and/or modifications to the character or setting of the Architectural Conservation Areas. The identification of areas of special interest within the plan boundary may be considered during the lifetime of the plan.

The Proposed Development site is not located within the Architectural Conservation Area and does not form part of the LAP plan area.

However, while the proposed development is located outside the Athenry LAP boundary, consideration of the relevant objectives demonstrates appropriate regard for the setting of the town and the protection of the Architectural Conservation Area in accordance with local planning policy. Refer to section 7.5.8 of this Planning Statement and Chapter 13 Cultural Heritage of the accompanying EIAR for further detail on the assessment of the impacts of Proposed Development on Archaeology and Cultural Heritage.

7. Planning Assessment

This section of the Planning Statement sets out the key planning considerations relevant to the Proposed Development having regard to applicable local, regional and national planning policy.

An EIAR has been prepared and accompanies this application to inform the competent authority's Environmental Impact Assessment (EIA) of the Proposed Development. In addition, Appropriate Assessment Screening was undertaken, which concluded that the preparation of a NIS was required. A NIS has therefore been prepared and submitted with the application to inform the competent authority's Appropriate Assessment.

It is not the purpose of this Planning Statement to duplicate the detailed environmental assessments contained within the EIAR and NIS. This section should therefore be read in conjunction with those documents.

7.1 Principle of Proposed Development

For clarity, the subject of this application is limited to the 220kV substation and grid connection infrastructure only. While functionally linked to the proposed Cashla Peaker Plant, the planning assessment herein relates solely to the transmission infrastructure.

The site of the Proposed Development is located within the administrative boundary of Galway County Council and is governed by the provisions of the Galway County Development Plan 2022-2028 (CDP).

The lands are unzoned and situated outside any defined settlement boundary, within the townlands of Rathmorrissy, Pollnagroagh, Moanbaun, Castlelambert, Knocknacreeva, Caraunduff, Caherbriskaun, Lisheenkyle East, Barrettspark, Cashla (Townlands), Athenry, Co. Galway. In this context, the assessment of the Proposed Development is not governed by land-use zoning designations applicable within towns or villages, but rather by the overarching policies and objectives of the County Development Plan. The absence of zoning does not preclude development; rather, the acceptability of development is determined having regard to the proper planning and sustainable development of the area and the specific policy provisions applicable to the location and development proposed.

The site forms part of the Oranmore-Athenry Strategic Economic Corridor (refer to Figure 3.2 of this planning statement). Policy Objective EL 2 of the CDP seeks to reserve lands within the SEC to support nationally and regionally significant activities and to identify sites of appropriate size and location to accommodate necessary infrastructure or support activities which would not be appropriate in proximity to centres of population or sensitive environments.

The Proposed Development constitutes strategic infrastructure by virtue of its function within the high-voltage transmission network and its role in supporting national electricity system operation.

The Proposed Development, comprising strategic electricity transmission infrastructure, is consistent with this objective.

> *"..Identify sites of appropriate size and location to accommodate necessary infrastructure or support activities which would not be appropriate in proximity to centre of populations or sensitive environments or economically sensitive activities.."* ***(Policy Objective EL 2)***

The CDP further recognises the importance of upgrading, improving and maximising infrastructural facilities within the SEC (Policy Objective EL 1) in order to attract investment and support economic growth. The Proposed Development will contribute to this objective by providing strategic electricity transmission infrastructure that supports security of electricity supply by connecting a proposed peaker plant (Cashla Peaker Plant) to the National grid and underpins the continued functioning of the SEC as a location for enterprise and employment.

The suitability of the site is further reinforced by its proximity to established energy infrastructure such as the existing 220kV Cashla Substation which is located nearby and to which it is proposed to connect into. The location within an established infrastructure corridor ensures that development is consolidated rather than dispersed, thereby limiting wider impacts on rural residential amenity.

As noted in section 6 of this report, Chapter 7 of the CDP outlines the county's objectives for infrastructure, utilities and environmental protection, and sets out the county's aim to:

> *"support and encourage investment and improvement in utilities, water, wastewater, electricity and gas infrastructure and support the development and enhancement of digital infrastructure".*

Furthermore, Policy Objective EG 2 Delivery of Electricity and Gas Infrastructure aims to:

> *"Support the provision and extension of electricity and gas transmission networks within the county which are critical to the economic development of the county subject to environmental quality, landscape, wildlife, habitats or residential amenity."*

The proposed development is consistent with the economic development strategy outlined in Chapter 5 of the CDP, as outlined in section 6 of this report, which supports the delivery of infrastructure-led economic growth, enterprise diversification, and job creation across the county. The proposed development aligns with the function of the SEC corridor by facilitating electricity transmission infrastructure of strategic scale, which supports economic activity while being appropriately located away from sensitive environments and residential centres. This designation, as outlined in the CDP, aims to attract national and international investment and promote the area as a centre for major national and international enterprise. The need for the Proposed Development arises from the requirement to provide additional grid infrastructure capacity at this location, in proximity to existing

high-voltage transmission assets, to facilitate efficient connection to the national electricity network

In this regard, the proposal is considered to be in accordance with the economic development objectives of the Oranmore – Athenry SEC and Policy Objective EL 2.

In view of the foregoing, and having regard to the site's location within the Strategic Economic Corridor its proximity to existing electricity transmission infrastructure, and alignment with the objectives of the CDP, particularly those related to infrastructure development, electricity transmission and economic growth, it is considered that the principle of the proposed development is acceptable and appropriate at this location.

7.2 Compliance with European Legislation and Policy

A detailed overview of the European Legal and Policy Context is provided in Section 6.1 of this planning statement. It highlights the progressive strengthening of policy measures and legal frameworks designed to meet a legally binding EU-wide target of at least 42.5% renewable energy consumption by 2030 under RED III, achieving the objective of climate neutrality in the Union by 2050 under the European Green Deal and the legal commitment of at least a 55% net reduction in greenhouse gas emissions by 2030 relative to 1990 levels as mandated by the European Climate Law (Regulation (EU) 2021/1119. The Fit for 55 legislative and policy framework is a central part of the EU's broader European Green Deal aiming to meet the 55% emissions reduction goal in a fair, cost-effective and competitive way.

Within this Legal and Policy context framework, the challenge of phasing out Europe's reliance on Russian fossil fuels by 2030 while improving the resilience and security of Europe's energy system is recognised. REPower EU proposes to achieve an acceleration in the green energy transition by supporting the diversification of supply, and the maintenance of reliable electricity infrastructure. This was further supported by EU Electricity Market Design Reform (2024-2026) which updated the regulatory framework governing electricity markets to reflect higher penetrations of variable renewable energy. The reformed framework acknowledges that accelerated deployment of renewable energy sources necessitates a growing availability of flexibility solutions as part of a resilient energy system.

The Proposed Development consists of electricity transmission infrastructure required to support a flexible market solution, i.e. the Cashla Peaker Plant, designed to support the integration of renewable energy sources into the electricity system. The Cashla Peaker Plant will provide backup or 'flexible' generation during critical periods as determined by system requirements when renewable energy sources are reduced and demand is high. Having regard to the European Policy and Legal Framework set out above and in section 6.1 of this planning statement, the provision of flexible and dispatchable capacity forms part of the broader system architecture required to facilitate increased renewable energy penetration while maintaining security of electricity supply.

In this context, the Proposed Development, as electricity transmission infrastructure, performs a critical enabling function within the electricity system by facilitating the transfer, distribution and integration of energy, including renewable energy, across the grid. As such, it is consistent with European policy objectives relating to system flexibility, grid resilience and security of electricity supply.

7.3 Compliance with National Policy and Legislation

A detailed overview of the National legal and policy context is provided in Section 6.2 of this planning statement. It sets out Ireland's legal commitment under the Climate Action and Low Carbon Development (Amendment) Act 2021 to achieve a 51% reduction in greenhouse gas emissions by 2030 (relative to 2018 levels) and to reach net-zero emissions no later than 2050. Within this overarching legal framework several key policy documents and plans have been prepared by the Government including the Policy Statement on Security of Electricity Supply 2021, the National Energy and Climate Plan 2021-2030, the National Energy Security Framework 2022, Energy Security in Ireland to 2030, Ireland's Long-term Strategy on Greenhouse Gas Emissions Reduction 2024 and the Climate Action Plan (CAP) 2025.

A key message within these plans and policy frameworks is the importance of ensuring the continuation of a secure supply of gas as a critical component of an increasingly renewable energy-based electricity system. The development of new conventional generation (including gas-fired and gasoil/distillate-fired generation) is outlined as a national priority (*Policy Statement on Security of Electricity Supply 2021*) and the procurement of at least 2GW of new flexible, enduring, capacity through market mechanisms by 2030 is recognised as a key policy enabler to support a secure transition to a renewables-led electricity sector (*Energy Security in Ireland to 2030*). The delivery of at least 2GW of New Flexible Gas Plant by 2030 is included as a national target within the CAP 25. Similarly, the National Development Plan 2021-2030 includes the following as a Strategic Investment Priority:

> *Delivery of circa 2 GW of new conventional (mainly gas-fired) electricity generation capacity to support the operation of a predominantly wind/solar electricity system and provide security of supply for when variable electricity generation (wind/solar) is not sufficient to meet demand*

The NDP review undertaken in 2025 confirmed that the strategic investment priorities set out in the National Development Plan 2021-2030 will continue to be implemented.

Taking into account the evolving national policy context, the Revised National Planning Framework (NPF) 2025 places stronger emphasis on ensuring the resilience and security of Ireland's energy systems, recognising the need for fuel diversification, enhanced system flexibility, and investment in critical infrastructure. The proposed development forms part of a wider project that, once connected to the National grid, will serve to reinforce the transmission network and facilitate the distribution of a more renewables focused source

of energy across the major demand centres in line with National Strategic Outcome 8.

The project will contribute to the delivery of nationally identified flexible generation capacity required to support renewable energy integration, safeguard security of electricity supply and facilitate the transition to a low-carbon and climate-neutral energy system. In this regard, the Proposed Development accords with the strategic direction set out in national legislation, energy security policy and capital investment priorities.

In respect of NSO 9, Sustainable Management of Environmental Resources and relevant NPOs concerning environmental protection, climate integration and river basin management, the environmental parameters of the development have been comprehensively assessed in the accompanying Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS).

The EIAR evaluates potential impacts across all relevant environmental factors, including climate, air quality, water, land and soils, noise, biodiversity and landscape. The NIS assesses potential effects on European Sites in accordance with the Habitats Directive. These assessments demonstrate that, subject to the mitigation measures proposed, the development is consistent with the environmental safeguards and climate objectives embedded within the NPF.

While national policy strongly supports the delivery of flexible generation capacity, it equally recognises the need for corresponding investment in electricity transmission infrastructure to ensure that such capacity can be effectively integrated into the national grid. The Proposed Development forms part of this essential transmission network infrastructure, enabling the efficient operation, reinforcement and resilience of the electricity system in accordance with national policy objectives.

7.4 Compliance with Regional Planning Policy

The Proposed Development comprises electricity transmission infrastructure required to connect a flexible and dispatchable generation asset to the National Grid which in turn will serve to support the secure integration of renewable energy into the electricity transmission network. Once connected to the existing Cashla 220kV Substation, the project will provide either 325MW or 334MW of generation capacity, reinforcing the regional and national transmission system and contributing to system resilience during periods of peak demand or reduced renewable output.

The Regional Spatial and Economic Strategy (RSES) for the Northern and Western Region 2020–2032 includes specific Regional Policy Objectives (RPOs) supporting the development and reinforcement of electricity and gas infrastructure as set out in Section 6.3.1.

The Proposed Development directly aligns with these objectives. It supports a secure and reliable electricity network (RPO 8.1), supports the strengthening of the electricity transmission network through the provision of new infrastructure (RPOs 8.2 & 8.4), facilitates renewable integration

through the provision of flexible dispatchable capacity (RPO 8.3), and is strategically located in proximity to existing high-capacity gas transmission infrastructure (RPO 8.6), thereby optimising established energy assets within the region.

Accordingly, the Proposed Development is consistent with, and supports the implementation of, the Regional Spatial and Economic Strategy for the Northern and Western Region 2020–2032.

7.5 Compliance with Local Planning Policy: Galway County Development Plan 2022-2028

7.5.1 Climate Change, Energy & Renewable Resources

Chapter 14 of the CDP acknowledges the fundamental role of secure, resilient, and decarbonised energy infrastructure in facilitating economic development, maintaining regional competitiveness, and delivering Ireland's legally binding climate and energy targets. The Plan recognises that while the expansion of renewable energy is critical to the national transition towards a low-carbon economy, there remains a continued need for flexible, dispatchable generation capacity to support grid stability during periods of variable renewable output.

The proposed development, comprising a 220kV substation and grid connection, represents a strategic form of electricity transmission infrastructure that is required to connect a proposed gas-fired open cycle gas turbine (OCGT) power plant (i.e. Cashla Peaker Plant) to the National grid. The purpose of the overall project is to provide fast-response electricity generation during times of peak demand or grid constraint, thereby complementing intermittent renewable sources such as wind and solar. This supporting role is consistent with the Plan's recognition of the need for secure and reliable electricity infrastructure to underpin renewable deployment and economic development.

In alignment with Policy Objective RE 1, the proposal supports the delivery of energy infrastructure that will enable greater integration of renewable energy into the national grid by mitigating risks associated with supply intermittency. Although the project itself does not constitute renewable generation, it is functionally interdependent with renewable deployment by ensuring overall system resilience and continuity of supply.

In addition, the Proposed Development is consistent with Policy Objectives EG 1 and EG 2, which support the sustainable improvement and expansion of electricity transmission and distribution infrastructure to accommodate both consistent and variable renewable energy flows. The development will reinforce existing grid infrastructure in proximity to the Cashla 220kV Substation and support the stable operation of the wider transmission network.

Furthermore, the proposal aligns with Policy Objective CC 2, which supports the transition to a competitive, low-carbon and climate-resilient economy, by facilitating renewable integration while maintaining security of supply.

To conclude, the Proposed Development is consistent with the objectives of the Galway County Development Plan 2022–2028, particularly those set out in Chapter 14 relating to climate action, energy infrastructure and the transition to a low-carbon economy. The siting of the Proposed Development within the Oranmore–Athenry Strategic Economic Corridor reflects the Plan's spatial strategy of directing nationally and regionally significant infrastructure to locations capable of accommodating such development, including areas proximate to existing high-voltage electricity and gas transmission infrastructure. The proposed grid connection will be located completely underground and the allocation of a capacity contract in the 2028 / 2029 T-4 Capacity Auction demonstrates that the project has developed in direct response to the capacity of the existing transmission grid network as required by Policy EG 2.

Having regard to the foregoing, the principle of the Proposed Development is considered to be consistent with the local planning policy framework and appropriate at this location.

7.5.2 Biodiversity

The Proposed Development has regard to the policy framework set out in Chapter 10 of the CDP, which aims to protect and enhance biodiversity, including both designated ecological sites and non-designated habitats of value. Chapter 5: Biodiversity of the EIAR outlines the baseline ecological conditions of the study area, informed by desk-based and ecological field surveys, and provides an assessment of potential effects. Mitigation measures including pre-construction ecological surveys, bunding, containment and groundwater monitoring, incorporation of bat sensitive lighting, limits on construction hours and limitations on vegetation clearance during the bird breeding season are proposed (refer to Chapter 5 for further detail). The assessment and mitigation measures proposed are consistent with Chapter 10 policy aims (NHB 4 and NHB 9).

The Habitats Directive (Council Directive 92/43/EEC) requires that all plans and projects must be screened for potential impact on Special Areas of conservation (SACs) or Special Protection Areas (SPAs). SACs and SPAs form a pan-European network of protected sites known as Natura 2000 sites. In accordance with Policy Objective NHB 2, an Appropriate Assessment (AA) screening has been undertaken to assess whether the project would result in likely significant effects on any European site, either alone or in combination with other pans or projects.

The AA screening identified that during the construction phase, works may involve the exposure of highly sensitive groundwater to potential contamination, and therefore, there is the possibility for contaminated groundwater to flow and ultimately discharge into Oranmore Bay and/or Dunbulcaun Bay. Although the distance via groundwater to the nearest relevant surface waterbody is significant (>6km), the precautionary principle was applied and potential effects on the qualifying interests/special conservation interest species and habitats present in Galway Bay Complex SAC, Cregganna Marsh SPA and Inner Galway Bay SPA were screened in for Stage 2 AA.

A Stage 2 Appropriate Assessment was therefore undertaken, and a Natura Impact Statement (NIS) accompanies this planning application. The NIS concludes that following a comprehensive evaluation of the potential direct, indirect and in-combination impacts on the qualifying interests of Galway Bay Complex SAC, Cregganna Marsh SPA and Inner Galway Bay SPA and taking account of the proposed mitigation measures, the Proposed Development will not adversely affect the integrity of any European site, either alone or in combination with other plans or projects.

The findings of the EIAR and the conclusions of the Stage 2 Appropriate Assessment demonstrate compliance with Policy Objective NHB 2 of the CDP and the requirements of Article 6(3) of the Habitats Directive. The Proposed Development, subject to the mitigation measures identified in the EIAR and NIS, will not result in adverse effects on European sites or on biodiversity within the receiving environment.

7.5.3 Flood Risk

In accordance with Chapter 14 of the CDP, which sets out the strategic approach to flood risk management in line with the Flood Risk Management Guidelines (2009), the Proposed Development, along with the wider Cashla Peaker Plant Project, has been assessed for flood risk. A Stage 1 Flood Risk Assessment, prepared by AtkinsRéalis, has been undertaken and can be found enclosed in Appendix 2 of the EIAR. The Stage 1 Flood Risk Assessment (Flood Risk Identification) concluded as follows:

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

The Cashla Peaker Plant project constitutes “Highly Vulnerable Development” within the meaning of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009), as it comprises electricity generating and transmission infrastructure, with the Cashla Peaker Plant also comprising a lower-tier Seveso site. A Stage 1 Flood Risk Assessment confirms that the site is located within Flood Zone C i.e. it has a low probability of flooding.

In accordance with the Flood Risk Matrix set out in the Guidelines, Highly Vulnerable Development is considered appropriate in Flood Zone C. As such, the Proposed Development is appropriate at this location from a flood risk perspective and neither a Justification Test nor a Stage 2 Flood Risk Assessment is required.

The proposal therefore complies fully with the relevant national guidance and the requirements of the CDP Policy Objectives FR8 and FR11.

7.5.4 Karst

During the pre-application consultation meetings, both the Commission and Galway County Council identified the Karst Landscape in the area as a key consideration. A detailed assessment of the potential effects of the project on Lands, Soils and Geology, including Karst, is set out in Chapter 11 of the EIAR and the potential effects on hydrogeology is dealt with in Chapter 12 Water. Both chapters conclude that no significant effects are predicted and should be referred to in conjunction with this section.

In summary, comprehensive geophysical and geotechnical surveys were undertaken to inform Chapters 11 and 12. The scope of the ground investigation was carefully developed by the AtkinsRéalis geotechnical and environmental teams to ensure that sufficient, project-specific geo-environmental and engineering data was obtained for the Proposed Project at the preliminary design stage. The investigation strategy was tailored to the receiving environment and aligned with the evolving engineering design, baseline monitoring data, and environmental assessment requirements.

The results of these surveys confirmed there is potential for subsurface karst features beneath the Proposed Development site. This has been fully characterised within the EIAR on a precautionary basis and has informed both the impact assessment and preliminary foundation design. Given the inherent heterogenous nature of karst geology, supplementary ground investigations will be undertaken at detailed design and pre-commencement stages to confirm the established ground model. These investigations represent refinement of an already robust understanding of site conditions. Foundation solutions have been specifically developed to accommodate karst geology as set out in the Ground Conditions and Preliminary Foundation Design Commentary: Technical Note prepared by AtkinsRéalis and enclosed in Appendix 11 of the EIAR. Robust karst management protocols set out in the CEMP (enclosed in Appendix 2 of the EIAR) will be implemented during construction to identify and appropriately address any features encountered. These measures will effectively manage risks relating to foundation performance, ground stability, and structural integrity, including protection of groundwater pathways ensuring no significant impact on the receiving land, soils, or geological environment.

During operation, no significant environmental impacts are anticipated in relation to underlying karst conditions.

As such, Chapters 11 and 12 conclude that no significant effects are expected at the construction or operational stage having regard to the precautionary assessment undertaken and the embedded mitigation measures described above.

7.5.5 Landscape & Visual Impact

The CDP recognises the significance of the county's landscapes and seeks to balance sustainable development with landscape protection. A comprehensive landscape and visual impact assessment is set out in Chapter 6: Landscape and Visual of the EIAR in accordance with policy objective LCM 2. The subject site is located within the Central Galway Complex Landscape

designation, specifically the Southern River Clare Basin Unit, which is classified as having low landscape sensitivity and value. This designation reflects a landscape unlikely to be adversely affected by change. Furthermore, there are no recorded protected views, prospects, or scenic routes in the vicinity of the site.

Residential receptors in proximity to the site are limited and dispersed in nature, consistent with the rural settlement pattern of the area.

A Zone of Theoretical Visibility (ZTV) was prepared to determine likely visual impacts and inform Chapter 6 of the EIAR. Due to the nature of the grid connection route which will be entirely underground, the ZTV focused on the above-ground elements of the project. The ZTV demonstrated that visual impacts will be primarily experienced from the motorway corridor to the west and south of the subject site. There may also be distant views from the surrounding regional road networks (R339, R347 and R348), sections of the surrounding local road networks (L3103, L7109, L3105 and L3125) and some dwellings located along these routes.

Sixteen representative viewpoints were selected for the purpose of preparing verified photomontages which show the existing view, Year 1 view, and Year 15 view (where relevant, when screen planting undertaken as part of the Cashla Peaker Plant development would be approximately 9 m in height)(refer to Figure 7.1). The photomontage booklet can be found in Appendix 6 of the EIAR. Overall, Chapter 6 of the EIAR concluded that during the construction and operational phases, the Proposed Project will result in a limited number of locally significant residual visual effects, principally within the immediate context of the main site. Significant adverse effects would be experienced by a small number of nearby receptors where the project would introduce new elements into the landscape and partially alter some existing views. Beyond these areas, residual effects would be slight or neutral and not significant in EIAR terms.

Figure 7.1 Photomontage Viewpoint Locations. Source: EIAR Volume 3 Appendix 6.1.

While the Proposed Development will introduce a new built element (proposed 220kV Substation) within an open landscape, the site is located within a landscape of low sensitivity and in proximity to existing infrastructure, including the M17/M18 Motorway and other infrastructural features (such as electricity pylons). In this context the Proposed Development will not appear incongruous within the receiving environment.

While the assessment identifies localised significant visual effects in the immediate vicinity of the Proposed Development, these effects are confined to a small number of nearby receptors and do not extend to the wider landscape. The site is located within a landscape of low sensitivity and within an established infrastructure corridor characterised by existing transport and energy infrastructure. In this context, the Proposed Development does not materially alter the overall character of the landscape. Furthermore, the implementation of mitigation measures, including boundary planting and screening as proposed in the separate S37E planning application, will reduce visual effects over time. On this basis, the visual effects identified are considered to be acceptable in the context of the strategic infrastructure proposed. Having regard to the nature, scale and function of the Proposed Development, the level of visual impact identified is not unexpected and is proportionate.

In this context and having regard to the strategic infrastructure nature of the proposal, the development does not materially undermine the objective of preserving the character of open landscape areas. Rather, it represents a proportionate intervention, consistent with Policy Objectives LCM 2 and LCM 4 of the County Development Plan.

7.5.6 Lighting

Chapter 7 of the CDP acknowledges the need to control artificial lighting in order to safeguard residential amenity, protect biodiversity, maintain visual and landscape quality, promote road safety, and support energy efficiency objectives. While recognising the operational need for lighting in certain developments, the CDP places strong emphasis on minimising unnecessary light spillage and maintaining dark skies, particularly in rural settings. The relevant policy framework includes Policy Objectives LP 1 Lighting Schemes, LP 2 Lighting and Climate Action and LP 3 Dark Skies.

A lighting report has been prepared by Lighting Reality and can be found enclosed in Appendix 2 of the EIAR. Lighting drawings have also been prepared by Lighting Reality and can be found as part of the planning application drawing pack. The lighting design has been prepared in accordance with EN-13201 and relevant national guidance, and demonstrates compliance with the performance standards set out in the CDP.

The operational lighting for the proposed project has been designed in line with Bat Conservation Trust guidance (GN 08/23) insofar as practicable having regard to safety and operational requirements, and has been informed by site-specific bat survey data.

The lighting has been designed so that levels reduce to less than 1 lux before reaching the site boundary. This ensures that light spill into adjoining lands and habitats is effectively controlled and that excessive light pollution is avoided. Baffles have been included on the lighting with the substation compound to direct the light as needed. The lighting design ensures no material impact on residential amenity

Importantly the current design achieves less than 1 lux before reaching the northern boundary which recorded the most bat activity during the bat surveys and contains trees which have bat roost potential (although no bats were recorded using the trees to roost during the surveys). This demonstrates that the lighting design responds directly to identified ecological sensitivities.

In addition, the Proposed Development will also benefit from the landscaping proposals submitted as part of the S37E planning application for the proposed Cashla Peaker Plant where extensive tree planting has been included along the western and northern boundaries to provide screening. This will further reduce light spill from the proposed development.

The combined effect of directional lighting, reduced colour temperature, shielding measures and landscape screening will maintain the rural character of the receiving environment and protect local biodiversity.

Accordingly, the lighting strategy demonstrably complies with Policy Objectives LP 1, LP 2 and LP 3 of the County Development Plan. The scheme minimises light spillage, utilises energy-efficient LED fittings, limits colour temperature, avoids upward light distribution, and protects identified ecological receptors. The Proposed Development therefore does not give rise to any material contravention of the lighting or dark skies policies of the CDP.

7.5.7 Traffic & Access

This section should be read in conjunction with Chapter 10 Traffic and Transportation of the EIAR which includes details of the traffic and transport assessment carried out. The assessment methodology is consistent with Transport Infrastructure Ireland's (TII) Traffic and Transport Assessment Guidelines in accordance with Policy Objective NR3 and DM33a.

Access to the Proposed Substation will be facilitated by way of a newly proposed 1.15km long access road subject of a separate S37E application (Case Ref: ACP-324113-26) which will connect from the proposed development site and wider Cashla Peaker Plant site to a proposed new vehicular entrance, also subject of the same S37E planning application, off the L3103 road, approximately 1km east of the M17 motorway. This access will facilitate both construction and operational traffic to and from the site in a safe and efficient manner. All parking during the construction period will be provided within the temporary construction compound adjacent to the proposed 220kV Substation within the site compound. The underground grid connection installation will be facilitated via a shuttle service for all operatives.

The proposed development site is expected to receive both standard and abnormal load deliveries. Standard deliveries will be facilitated via the

immediate regional road system which include the following roads (in order of proximity to the site): L3103, R339, R347, M6 and the M17. The extraordinary abnormal loads are anticipated to utilise the route illustrated in figure 7.2 below and will be managed in accordance with the statutory abnormal load permitting process and the approved Construction Traffic Management Plan (CTMP).

The development is not anticipated to generate significant volumes of traffic during its operational phase due to the minimal staff presence on-site, including when considered in combination with the wider Cashla Peaker Plant development. The majority of traffic movements will occur during the construction phase which will be temporary in nature and managed via an approved CTMP to ensure no significant adverse impact on the capacity, safety or operational efficiency of the surrounding road network.

Due to the nature of the grid connection works, which will largely take place within the public road corridor, a detailed construction traffic management plan was prepared to provide additional clarity on the mitigation measures proposed to reduce the impacts on the local road network, where both full and partial road closures will be required. The CTMP provides detailed information on the possible diversion routes and proposed traffic management measures which ensure that access along the local roads will be maintained for residents with trench lengths limited to sequential 30-50m sections and shorter segments between 2-5m implemented in scenarios where adjacent properties create short segments between access points. This will ensure residents' entry and egress from their properties is maintained at all times.

Chapter 10 of the EIAR takes into account the cumulative impact of the Gannow Windfarm (Planning Ref: (Ref: 25/61412) which is currently subject of an appeal to An Coimisiún Pleanála and where sections of the grid connection routes would overlap if both projects were permitted. It concludes that the construction phase of the project will result in short-term significant impacts however significant mitigation measures will be implemented to reduce the overall impact. These effects are temporary in nature and will be managed to ensure continued access to all residential properties at all times. No other significant impacts are anticipated during any other phase.

Abnormal Loads and Construction Traffic Management

It is anticipated that abnormal load movements will be required during the construction phase of the Proposed Development, particularly for the delivery of oversized plant equipment and specialist components which fall under the definition of Exceptional Abnormal Loads. These movements will be planned in close coordination with Transport Infrastructure Ireland (TII), Relevant Local Authorities, and An Garda Síochána, in accordance with relevant TII guidance and abnormal load permitting requirements.

The exceptional abnormal load deliveries are anticipated to utilise the haul route illustrated in figure 7.2. below. The final haul route will be agreed prior to the delivery of extraordinary or abnormal loads, which may occur several

months after the commencement of on-site construction activity for the Proposed Development.

As part of the abnormal load delivery process pre-construction and post-construction surveys of the public road network proposed for use as haul routes, including inspections of bridges, culverts, and other relevant structures, shall be carried out by the applicant in advance of the first abnormal load delivery. These requirements shall not apply to earlier phases of development that do not involve such movements.

The locations and scope of the surveys and inspections shall be agreed in advance with the Roads Authority and shall include structural capacity assessments, where required, to confirm the network's suitability to accommodate the proposed load types and volumes.

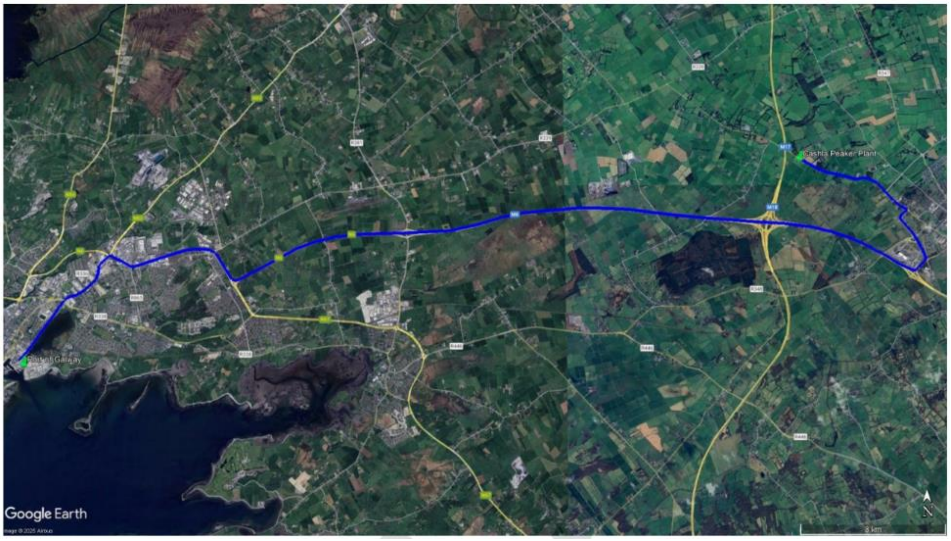

Figure 7.2 Proposed Abnormal Load Haul Route. Source: Chapter 10 Traffic and Transportation EIAR (AtkinsRéalis, 2026)

As set out in Section 2.3.7 of this Planning Statement, it is respectfully submitted that any Grant of Permission include a condition requiring the submission and agreement of an Abnormal Load Management Plan prior to the first delivery of any abnormal or Exceptional Abnormal Load (and not prior to commencement of development generally).

Having regard to the findings of the Traffic and Transport Assessment, the limited operational traffic generation associated with the proposed 220kV Substation and grid connection, and the management measures proposed for the construction phase (including abnormal load coordination as set out in Section 2.3.7), it is concluded that the Proposed Development will not give rise to any significant adverse impact on the capacity, safety or operational efficiency of the surrounding road network. Accordingly, the proposal is consistent with Policy Objectives NR1 Protection of Strategic Roads, NR3 Traffic and Transport Assessment and NNR2 Safeguard Regional and Local Roads of the County Development Plan.

Parking

DM Standard 31 of the CDP sets out the parking standards for the County and the car parking standards for both 'Industry, Manufacturing and Light Industry' as set out in Table 7.1 below:

Table 7.1 Maximum Car Parking Standards

Development	Car Parking Standard
Industry/Manufacturing/Light Industry	1 car space per 33m2 of gross floorspace
Data Centre 1 per 100m2 gross floor area	1 space per 100m2 gross floor area

DM Standard 31 sets out that a flexible approach to these standards may be applied where such a case is substantiated, there is no traffic safety issue, and it is clearly demonstrated to the Planning Authority.

The Proposed Development comprises an industrial development. However, the facility is designed to operate with a minimal on-site staffing requirement, consisting primarily of routine maintenance personnel.

Given the low level of staffing, it is considered that the parking standards for a Data Centre are an appropriate comparison in this instance. If the development were to be classified similarly to a data centre based on its low occupancy the maximum parking requirement would be approximately 4 spaces (based on an overall floor area for the Proposed Development of 388sqm).

The current proposal includes provision for 4 parking bays. This level of provision is considered proportionate to the operational characteristics of the development and reflects the flexible approach permitted under DM Standard 31.

7.5.8 Archaeology & Cultural Heritage

The CDP establishes the policy framework for the protection, conservation, and management of archaeological, architectural, and cultural heritage within the county. Archaeological heritage encompasses both known and potential sites, structures, features, and objects above and below ground, as identified in the Record of Monuments and Places (RMP) and Zones of Archaeological Potential (ZAP). The CDP states that Council requires that a proposed development (due to location, size or nature) which may have archaeological implications for archaeological heritage be subject to an archaeology assessment. As set out in the CDP

> *"This includes areas close to archaeological monuments, extensive in area (half hectare or more) or length (1km or more) and development that require an Environmental Impact Statement[4]."*

[4] It is assumed that the CDP is referring to an Environmental Impact Assessment Report.

The Proposed Development is 12.11 ha in area and is also accompanied by an EIAR therefore an archaeological assessment was carried out in accordance with the requirements of the CDP. Full detail of the archaeological impact assessment is set out in Chapter 13 Cultural Heritage of the accompanying EIAR. The assessment was informed by a desktop study, field inspection, geophysical survey (under Licence No. 25R0081) and test excavation (under Licence No: 25E0549).

No RMPs were identified within the red-line boundary of the Proposed Development as part of the desk-based study however the grid connection route crosses the zone of notification for two RMPs (Monument No: GA084-096001 Monument No: GA084-096002). Mitigation measures have been provided for archaeological monitoring of any works undertaken within the zone of notification for these monuments however it is noted that the effect on these monuments is reduced by the location of the L3103 within which the works will take place. Archaeological monitoring is also required for areas targeting CH059 (which is a vernacular structure identified from the cartographic record) where the groundworks for proposed HDD exit pit under the M6 will take place and also for the footprint of the proposed grid connection cable route in areas not previously disturbed by services, road or other modern construction.

A Geophysical survey was carried out on the lands where the proposed substation will be located which recorded several areas of enhanced magnetic responses/anomalies. However, the test excavation carried out confirmed that none of these anomalies were of archaeological significance.

Due to the proximity of the Proposed Development to the Athenry Town Centre ACA, an assessment was undertaken to consider whether there are any potential effects on the ACA. This assessment was informed by overlaying a map of the cultural heritage features within the visual buffer of the Zone of Theoretical Visibility produced by Eamonn Byrne Landscape Architects Ltd. The assessment concluded that the Proposed Development will have no visual effect on the view or setting of the historic town centre.

The assessment concludes that, subject to the implementation of appropriate archaeological mitigation measures during the construction phase of the project, no significant residual impacts on archaeological, architectural or cultural heritage are predicted. As such, it is considered that the proposed development aligns with Policy Objectives ARC 1, ARC 4, ARC 5 and ARC 9 of the CDP and ASP 40 of the Athenry LAP by safeguarding archaeological interests through the robust assessment of potential archaeology which informed the layout and design of the Proposed Development.

Furthermore, the assessment demonstrates that the Proposed Development will not adversely affect the significance, setting, character or visual amenity of any Recorded Monument, Archaeological Site, or the Athenry Architectural Conservation Area. Accordingly, the proposal is considered fully consistent with the heritage protection objectives of the CDP and the Athenry LAP.

7.5.9 Noise

The CDP recognises environmental noise as a significant issue affecting human health, quality of life, and the natural environment. The proposed development has been designed to fully address the noise-related requirements of the CDP and Objectives NP3, NP4 and NP5. A detailed Noise and Vibration Assessment has been undertaken as part of the EIAR (refer to Chapter 9).

This assessment considers construction and operational noise with particular focus on noise-sensitive locations. Construction noise sources include construction plant, machinery and construction related traffic on surrounding roads. Operational noise sources primarily include operational plant noise with an element on-site vehicular activity and traffic flows to and from the development site onto the public roads.

As the grid connection works will be undertaken using a rolling construction method, with approximately 30–50 m of road constructed and backfilled each day, the assessment considered that no significant noise effects will be associated with the construction of this element of the proposed works. An assessment of the noise impact of the horizontal directional drilling was also undertaken and concluded that significant effects were not predicted at the identified noise sensitive locations. Notwithstanding this, various mitigation measures will be applied during the construction of the Proposed Development and reference will be made to BS5228 Parts 1 and 2, which offer detailed guidance on the control of noise and vibration from construction activities.

Accordingly, the Proposed Development will not give rise to significant adverse noise or vibration effects during construction or operation and is considered consistent with Policy Objectives NP3, NP4 and NP5 of the County Development Plan.

7.5.10 Air Quality

The Proposed Development has been assessed with regard to potential impacts on air quality, recognising the importance of maintaining ambient air standards to protect human health and the environment, as outlined in the CDP.

Consistent with Policy Objectives AQ1, AQ2 and AQ3 of the CDP, a comprehensive air quality impact assessment has been undertaken as part of the EIAR (refer to Chapter 7 Air). The assessment demonstrates that, subject to the implementation of proposed mitigation measures (such as dust minimisation measures), emissions associated with the construction phase of the Proposed Development will comply with all EU ambient air quality legislative limit values (set out in Directive (EU) 2024/2881 and the Air Quality Standards Regulations 2022).

Having regard to the findings of the EIAR, the implementation of construction-phase dust mitigation measures demonstrate that the proposed development will operate within applicable Environmental Quality Standards and legislative limit values. The preparation of a comprehensive Air Quality Impact Assessment and the incorporation of appropriate

mitigation and monitoring measures ensure that potential impacts on ambient air quality are appropriately assessed, avoided and controlled. The proposed development therefore accords with Objectives AQ1, AQ2 and AQ3 of the CDP and complies with relevant EU and national air quality legislation.

7.5.11 Residential Amenity

The Proposed Development has been carefully assessed in terms of its potential effects on residential amenity, having regard to proximity to dwellings, visual impact, noise, traffic and lighting. The receiving environment is characterised by a dispersed rural settlement pattern, with a limited number of residential receptors in the vicinity of the proposed substation. Residential development along the grid route is notably ribbon development whereby impacts are limited to the construction phase only and would be temporary having regard to the nature of laying cables in linear segments.

While the Landscape and Visual Impact Assessment identify localised significant visual effects for a small number of nearby receptors, these effects are confined to the immediate context of the site and do not materially alter the character of the wider landscape, which is of low sensitivity and already influenced by existing infrastructure.

Construction-related impacts, including traffic, noise and temporary disturbance associated with the installation of the underground grid connection, will be short-term in duration and managed through the implementation of a Construction Traffic Management Plan and standard construction mitigation measures, ensuring that access to all residential properties is maintained at all times.

Operational impacts are limited, with minimal traffic generation, controlled lighting design to prevent light spill, and noise levels that will comply with applicable standards at the nearest residential receptors.

Having regard to the above, it is considered that the Proposed Development will not give rise to any unacceptable impact on residential amenity and is therefore consistent with the proper planning and sustainable development of the area.

8. Conclusion

This Planning Statement has assessed the Proposed Development against relevant European, national, regional, and local planning policy frameworks and objectives. This assessment demonstrates that the Proposed Development is consistent with RED III, the European Green Deal 2019, European Climate Law 2021, REPower EU, Fit for 55 and the EU Electricity Market Design Reform (2024–2026), by supporting the integration and distribution of renewable energy within the electricity system through the provision of critical electricity transmission infrastructure.

At the national level, the Proposed Development aligns with the Climate Action and Low Carbon Development (Amendment) Act 2021, the Policy Statement on Security of Electricity Supply 2021, the Climate Action Plan 2025, the National Energy and Climate Plan 2021 – 2030, the National Energy Security Framework 2022, Energy Security in Ireland to 2030, Ireland's Long-term Strategy on Greenhouse Gas Emissions Reduction – 2024, the EirGrid Generation Capacity Statement, the Revised National Planning Framework and the National Development Plan. Collectively, these documents identify the need for secure, resilient, and flexible electricity infrastructure, including transmission networks, to support Ireland's transition to a low-carbon, climate-resilient economy while maintaining system security.

Regionally, the Proposed Development supports the objectives of the Regional Spatial and Economic Strategy for the Northern and Western Region 2020–2032, contributing to a secure, strengthened and reliable electricity network and facilitating the integration of renewable energy, in a manner consistent with Regional Policy Objectives RPO 8.1, 8.2, 8.3, 8.4 and 8.6.

At the local level, the Proposed Development is consistent with the Galway County Development Plan 2022–2028, which recognises that an efficient and secure electricity supply is essential to the future growth and sustainable development of County Galway. The project also aligns with the strategic objectives for economic development and infrastructure delivery within the Oranmore and Athenry Strategic Economic Corridor, which seeks to accommodate nationally and regionally significant infrastructure at appropriate locations.

Extensive environmental assessment has demonstrated that all potential impacts across noise, air quality, traffic, landscape, land and soils, biodiversity, and climate have been robustly evaluated as part of the EIAR process. A comprehensive suite of avoidance, mitigation, and monitoring measures ensures that impacts are prevented at source, minimised during construction, and controlled throughout the operational lifecycle. A Natura Impact Statement also accompanies this planning application and concludes beyond reasonable scientific doubt that the Proposed Development, alone or in combination with other plans and projects, will not adversely affect the integrity of any European site.

In overall terms, the Proposed Development represents critical electricity transmission infrastructure that supports Ireland's legally binding climate

targets, renewable energy integration, and electricity system security objectives. The project is fully aligned with the relevant European, national, regional and local policy frameworks and has been subject to comprehensive environmental assessment in accordance with statutory requirements. The EIAR and Natura Impact Statement confirm that environmental effects are appropriately avoided, mitigated and managed, with no adverse effects on the integrity of European sites.

Having regard to the strategic importance of the Proposed Development, its consistency with policy at all tiers of the planning hierarchy, the suitability of the site within an established infrastructure corridor, and the fact that any identified environmental effects are localised, limited in extent and appropriately mitigated, it is considered that the Proposed Development will not give rise to any material contravention of the Development Plan or adverse impact on the receiving environment. The Proposed Development therefore constitutes an appropriate form of development at this location and is consistent with the proper planning and sustainable development of the area.

Appendix 1: Opinion issued by An Coimisiún Pleanála under Case Ref: ACP-323874-25

Our Case Number: ACP-323874-25

Your Reference: Bord Gais Energy

An Coimisiún Pleanála

McCutcheon Halley Planning Consultants
6 Joyce House
Barrack Square
Ballincollig
Co. Cork
P31 YX97

Date: 09 February 2026

Re: 220kV Substation and 220kV Grid Connection and all associated works located on lands in Rathmorrissy, Pollnagroagh, Moanbaun, Castlelambert, Knocknacreeva, Caraunduff, Caherbriskaun, Lisheenkyle East, Barrettspark, Cashla (Townlands), Co. Galway.

Dear Sir / Madam,

Please be advised that following consultations under section 182E of the Planning and Development Act 2000, as amended, the Commission hereby serves notice that it is of the opinion that the proposed development falls within the scope of section 182A of the Planning and Development Act 2000, as amended. Accordingly, the Commission has decided that the proposed development would be strategic infrastructure within the meaning of section 182A of the Planning and Development Act 2000, as amended. Any application for approval for the proposed development must therefore be made directly to An Coimisiún Pleanála under section 182A(1) of the Act.

Please also be informed that the Commission considers that the pre-application consultation process in respect of this proposed development is now closed.

The following is a list of prescribed bodies to be notified of the application for the proposed development:

• Minister for Housing, Local Government and Heritage • Minister for the Environment, Climate and Communications

• Galway County Council

• Commission for the Regulation of Utilities

• Transport Infrastructure Ireland

• Uisce Éireann

• Inland Fisheries Ireland

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- Office of Public Works
- An Taisce
- Heritage Council
- An Chomhairle Ealaíon
- Fáilte Ireland
- HSE

Further notifications should also be made where deemed appropriate.

In accordance with section 146(5) of the Planning and Development Act 2000, as amended, the Commission will make available for inspection and purchase at its offices the documents relating to the decision within 3 working days following its decision. This information is normally made available on the list of decided cases on the website on the Wednesday following the week in which the decision is made.

The following contains information in relation to challenges to the validity of a decision of An Coimisiún Pleanála under the provisions of the Planning and Development Act 2000, as amended.

Judicial review of An Coimisiún Pleanála decisions under the provisions of the Planning and Development Acts (as amended).

A person wishing to challenge the validity of a Commission decision may do so by way of judicial review only. Sections 50, 50A and 50B of the Planning and Development Act 2000 (as substituted by section 13 of the Planning and Development (Strategic Infrastructure) Act 2006, as amended/substituted by sections 32 and 33 of the Planning and Development (Amendment) Act 2010 and as amended by sections 20 and 21 of the Environment (Miscellaneous Provisions) Act 2011) contain provisions in relation to challenges to the validity of a decision of the Commission.

The validity of a decision taken by the Commission may only be questioned by making an application for judicial review under Order 84 of The Rules of the Superior Courts (S.I. No. 15 of 1986). Sub-section 50(7) of the Planning and Development Act 2000 requires that subject to any extension to the time period which may be allowed by the High Court in accordance with subsection 50(8), any application for judicial review must be made within 8 weeks of the decision of the Commission. It should be noted that any challenge taken under section 50 may question only the validity of the decision and the Courts do not adjudicate on the merits of the development from the perspectives of the proper planning and sustainable development of the area and/or effects on the environment. Section 50A states that leave for judicial review shall not be granted unless the Court is satisfied that there are substantial grounds for contending that the decision is invalid or ought to be quashed and that the applicant has a sufficient interest in the matter which is the subject of the application or in cases involving environmental impact assessment is a body complying with specified criteria.

Section 50B contains provisions in relation to the cost of judicial review proceedings in the High Court relating to specified types of development (including proceedings relating to decisions or actions pursuant to a law of the state that gives effect to the public participation and access to justice provisions of Council Directive 85/337/EEC i.e. the EIA Directive and to the provisions of Directive 2001/12/EC i.e. Directive on the assessment of the effects on the environment of certain plans and programmes). The general provision contained in section 50B is that in such cases each party shall bear its own costs. The Court however may award costs against any party in specified circumstances. There is also provision for the Court to award the costs of proceedings or a portion of such costs to an applicant against a

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respondent or notice party where relief is obtained to the extent that the action or omission of the respondent or notice party contributed to the relief being obtained.
General information on judicial review procedures is contained on the following website, www.citizensinformation.ie.
Disclaimer: The above is intended for information purposes. It does not purport to be a legally binding interpretation of the relevant provisions and it would be advisable for persons contemplating legal action to seek legal advice.

If you have any queries in the meantime, please contact the undersigned officer of the Commission or email sids@pleanala.ie quoting the above mentioned An Coimisiún Pleanála reference number in any correspondence with the Commission.

Yours faithfully,

pp DC

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VC11

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Appendix 2: MHC Letter

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February 2026 **Our ref:** MHC/43206.34

MHC-39634763-1

Matter: Cashla Peaker Plant Development (the "Proposed Project")

1 Introduction

1.1 This letter is provided to supplement and support the planning application for the Proposed Project.

1.2 This letter considers the legal framework and national policy supporting the Proposed Project, in particular the national target of '*at least 2 GW*' new flexible gas plant by 2030 as provided for in Chapter 11 of the Climate Action Plan 2025.[1]

2 The Climate Act

2.1 The Climate Action and Low Carbon Development Act 2015 was amended by the Climate Action and Low Carbon Development (Amendment) Act 2021 (together the "**Climate Act**")

2.2 Section 15 of the Climate Act states that:

> *"15. (1) A relevant body shall, in so far as practicable, perform its functions in a manner consistent with—*
>
> *(a) the most recent approved climate action plan,*
>
> *(b) the most recent approved national long term climate action strategy,*
>
> *(c) the most recent approved national adaptation framework and approved sectoral adaptation plans,*
>
> *(d) the furtherance of the national climate objective, and*

[1] https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/climate-action-plan-2025/

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(e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State".

2.3 Section 15 of the Climate Act provides that the Government and State's climate objectives shall be considered "*in so far as practicable*".

3 Climate Action Plan ("**CAP25**")

3.1 CAP25 sets a target of delivering '*at least 2 GW'* of new flexible gas plant by 2030.

3.2 It is recognised that based on current consents granted at the time of the planning application for the Proposed Project, Ireland appears to be on target to reach the 2GW minimum of new flexible gas generation projects. However, it must also be recognised that the majority of consents granted have yet to be constructed. In reality, there is no guarantee that these projects will be built in a timely manner or indeed if all permissions granted to date will be implemented.

3.3 Several key factors can influence if a permitted development is constructed including financing, grid connection allocation of a capacity contract, planning delays such as judicial reviews, contractor, skills and materials availability, and costs. These are factors that are outside of the control of a developer and are entirely separate to the grant of planning.

3.4 Given the broad scope of factors that can influence the progression of permitted development, there must be a recognised attrition rate for same. As set out in section section 34(13) of the Planning and Development Act 2000 (as amended):

> "*A person shall not be entitled solely by reason of a permission under this section to carry out any development."*

3.5 Section 2.1 of CAP25, sets out '*Trends in Ireland's Emissions to Date'*:

> "The sectoral makeup of our emissions has changed considerably since 1990. Emissions in the transport sector increased by 129.2% to 2023 driven by a high reliance on private car travel as well as rapidly increasing road freight transport. On the other hand, emissions from electricity generation fell by 32.1% during a timeframe where electricity consumption grew by 164%. This was driven by more efficient gas-fired power plants replacing older peat and oil-fired plants, an increased share of renewables, and increased interconnectivity"
>
> (emphasis added)

3.6 In addition, CAP25 explicitly references the policy document '*Energy Security in Ireland to 2030*', as follows:

> *"In November 2023, Energy Security in Ireland to 2030, was published. This sets out the strategic approach to ensure a secure transition for Ireland's energy systems, in line with our climate objectives, and sets out the energy security related actions to be taken out to 2030".*

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3.7 The policy document "*Energy Security in Ireland to 2030*"[2] supports the use of gas as part of the energy transition, including the addition of new gas-fired generation such as the Proposed Project, as flexible back-up on the electricity system.

3.8 It is clear from the above that CAP25 clearly supports the Proposed Project. As further set out in Chapter 8 – Climate (sections 8.4 and 8.6) of Volume 2 of the EIAR the Proposed Project is designed to work in partnership with and support renewable energy generating projects to ensure energy security during the transition to a net zero economy.

3.9 In addition, it is important to note that the Proposed Project has been allocated a capacity contract in the 2028 / 2029 T-4 Capacity Auction. The importance of this is twofold. Firstly, this is an important requirement outside of planning to facilitate development, as set out at section 3.3 above.

3.10 Secondly, it is notable that the capacity auctions, run by EirGrid and SONI in their roles as Transmission System Operators in Ireland and Northern Ireland respectively, through the joint venture SEMO (Single Electricity Market Operator) were designed by the electricity regulators in Ireland and Northern Ireland to ensure sufficient capacity is secured to meet demand across the island.

3.11 The 2028 / 2029 T-4 Capacity Auction, as set out in the Capacity Auction Results Report dated 16 January 2025[3], awarded the Proposed Project its capacity contract. Auction requirement quantities identified in this auction incorporated all successful existing MW of gas turbine technology into the assessment identifying the requirement for new capacity, in order to maintain security of supply on the system. It should be noted that auction required quantities were adjusted by the Regulatory Authorities to account for various considerations such as reserves and non-participating capacity.

4 National Policy

4.1 As set out in section 10.1.7 of CAP 25:

> *"The planning system plays an integral role in meeting the National Climate Objective and having a vertically integrated policy framework that supports the actions in this Climate Action Plan is critical. From a national planning policy perspective, the National Planning Framework (NPF) provides an established means through which to implement and integrate climate change objectives, including adaptation, at national, regional, and local levels, and the transition to a low carbon and climate resilient society.*
>
> *The NPF sits at the top of the planning hierarchy and provides the overarching context for the regional and local tiers below it, thereby securing the alignment of policies and*

[2] https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/energy-security-in-ireland-to-2030/

[3] https://www.sem-o.com/sites/semo/files/documents/general-publications/20282029-T-4-Final-Capacity-Auction-Results-Report-FCAR2829T-4.pdf

objectives as part of the plan-making process, including alignment with the Climate Action Plan."

4.2 The Revised NPF also highlights the need for a diversified energy portfolio from multiple sources including gas, to underpin the growth of renewable electricity and safeguard energy security.[4] The Proposed Project directly contributes to these objectives by enabling the transition to a low-carbon energy system.

4.3 Finally, it should be noted that the Proposed Project falls squarely within Government policy, enabling and supporting the decarbonisation of energy systems, as set out in the Policy Statement on Security of Electricity Supply (November 2021)[5] and the CRU Information Paper: Security of Electricity Supply Programme of Actions (September 2021). The Proposed Project comprises Gas Powered Turbine Peaking Plant that will provide back-up electricity to the national grid.

4.4 The Proposed Project is further supported by national and European policy as set out in Chapter 8 – Climate (sections 8.3.1.2.1 - 8.3.1.2.2) of Volume 2 of the EIAR submitted with the planning application for the Proposed Project.

5 Coolglass Wind Farm Limited v An Bord Pleanála [2026] IESC 5

5.1 For completeness, we refer to the decision of the Supreme Court in *Coolglass Wind Farm Limited v An Bord Pleanála* [2026] IESC 5 dated 4 February 2026 in relation to the obligations on a relevant body under section 15 of the Climate Act, as set out at section 2 above.

5.2 In the High Court's judgment in *Coolglass* [2025] IEHC 1, Humphreys J acknowledged that *"the concept of net zero implies a continuing necessity for some emissions in the short term at least"* and that *"there will be other imperatives of economic necessity that require projects that, in and of themselves, wouldn't support climate goals in isolation"*.

5.3 In this respect, we refer to the following extracts from that judgment: -

> *"119. The logical implication of that is that s15 applies to the board as it applies to other relevant bodies and as other provisions of the legislation apply to central and local government. It imposes an obligation to act consistently with the climate plans and objectives referred to in s15 insofar as practicable. That does not mean allowing an application which is prohibited by law. That wouldn't be practicable apart from anything else. But it does mean exercising discretionary and evaluative powers in whatever way is most likely to be consistent with the relevant plans and objectives.*
>
> ***132. I do need to emphasise that the obligation to use discretionary powers favourably to renewable energy infrastructure does not automatically translate into an obligation to refuse permission for developments that cause emissions**.*

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[4] Page 133, revised NPF April 2025 https://www.npf.ie/first-revision-to-the-national-planning-framework/national-planning-framework-first-revision-april-2025/

[5] https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/policy-statement-on-security-of-electricity-supply/

> *One can see an argument as to why the board would not be required to start from a position of scepticism in relation to projects causing emissions to quite the same extent as it should start from a presumption of favourability regarding renewable projects. We can save detailed consideration for a case in which it arises but there are two obvious reasons for this:*
>
> *(i)* ***The concept of net zero implies a continuing necessity for some emissions in the short term at least. That relates to the fact that pending complete adaptation of the economy, there will be other imperatives of economic necessity that require projects that, in and of themselves, wouldn't support climate goals in isolation****. Energy security to enable the ongoing orderly functioning of society, especially in the context of the Russian Federation's full-scale criminal war of aggression against Ukraine, is one example.*
>
> *(ii) Even if a project is not in itself driven by such an imperative, one has to be conscious of displacement effects. Refusal of a project in Europe may simply have the effect of the project being relocated to a jurisdiction with lower environmental standards, thus producing more emissions overall. Emissions are definitionally a cumulative global problem, so while refusing such projects feels good in the moment, it may or may not be doing anything to combat climate change. Rightly or wrongly, that was an explicit part of my thinking in An Taisce v. An Bord Pleanála [2021] IEHC 254, [2021] 7 JIC 0205 (Unreported, High Court, 2nd July 2021). Such an approach doesn't particularly give one a feeling of virtue, but it makes a certain amount of sense depending on the context.*
>
> ***133. In other words, it doesn't automatically follow from a pro-renewables interpretation that there must be, say, an anti-cheese factory interpretation, an anti-data centre interpretation or an anti-LNG storage interpretation. The trade-offs and displacement effects would need to be considered".***
>
> (emphasis added)

5.4 The Supreme Court upheld the High Court's decision in *Coolglass*, although it did not fully agree with the High Court's reasoning. That said, the Supreme Court did agree with the High Court in finding that the concept of net zero does allow for emissions generating projects. At paragraph 86 of the Supreme Court's judgment it states:

> *"****The second reason the judgment gives is more important. It acknowledges that the concept of net zero contemplates a balance between projects, and can encompass some which may be emission generating, but are of particular economic, social, and community advantage, and other projects****. Because the national climate objectives are stated as a total global figure, the refusal of permission for a particular project which is said to be climate friendly, and* ***the grant of permission for one which may create greenhouse gases, may still be consistent with the overall achievement of climate targets****. A target is a net one to be assessed globally. But if that is so, and it is, the qualified consistency obligation imposed by s. 15(1) cannot be the sole or even principal determinant of the refusal or grant, or grant subject to conditions (subject to practicability) of planning permission. Considerations of proper planning and sustainable development are necessarily*

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taken into account in any decision, and ***the High Court judgment correctly recognises that emission creating developments may be properly permitted****."*

(emphasis added)

5.5 These statements from the *Coolglass* judgments align with the current abundance of national policy supporting the Proposed Development, as set out in the application documentation and at sections 3 and 4 above.

5.6 The Supreme Court's judgment confirms that there may be projects which result in emissions, but which should not necessarily be refused on the basis of emissions. The obligation is on the decision maker to ensure its decision is consistent with the policies and objectives listed in s15 of the Climate Act in so far as practicable. The Supreme Court confirmed at paragraph 118(ii) of its judgment that this obligation to ensure consistency in so far as practicable involves more than an obligation to "have regard to" the climate objectives referred to in section 15.

5.7 Peaking plants are only required to provide power for limited durations when wind or solar energy cannot meet demand, such as the Proposed Project, they support the development and integration of renewable generation infrastructure and are therefore consistent with the Climate Action Plan and necessary for the security of Ireland's energy supply. The transition to renewable energy would not be possible without such back-up infrastructure.

5.8 It should also be noted that in the more recent High Court case of *Friends of Kilmoney v An Bord Pleanala* [2025] IEHC 407, Humphreys J made observations about projects that cause emissions and how decision makers should deal with the same. In this respect, we refer to the following extracts from the judgment:

"172. Some potential considerations are as follows:

(i) All consent functions have to be exercised as far as practicable in a manner consistent with climate goals – as required by s15 of the 2015 Act as amended by the 2021 Act.

(ii) Compatible essentially means contributing to the goals set out. Thus a project has to be either climate-neutral (not causing emissions, or any emissions being balanced by off-sets), ***or else provided for in the relevant climate action plan (either as a specific project or as part of a category of projects which are sufficiently identifiable by size and number such that the commission can determine whether any individual grant of permission would be compatible with the plan)****. The commission is not a catch-all national policy-making body – Government has to be specific enough to allow the commission to make individual decisions. In the absence of specificity the commission may not be able to come lawfully to a conclusion of consistency.*

(iii) The commission's conclusion that the project is compatible with such goals can be challenged if irrational or unreasoned, or if based on flawed reasons.

(iv) Only the additional GHG emissions of the project are crucial, bearing in mind that the scenario of no consent is not normally one of no emissions but of an alternative

(sometimes higher) level of emissions. Displacement effects such as relocation of projects may be relevant in some cases but in other cases relocation may not lead to higher emissions given the continually intensifying global focus on renewable energy and the many areas of the world where renewables are more readily accessible than here (solar energy in the tropics, geothermal power in Iceland, and so on).

(v) Consistent with the 2015 Act, ***the commission may determine that it is not practicable to ensure compliance with climate goals. This may arise by virtue of imperative requirements of social order such as energy security or other essential infrastructure, or even where energy projects based on fossil fuels are required to stabilise the grid during periods when the winds are not blowing, to put it colloquially****…"*

(emphasis added)

6 Conclusion

6.1 The Proposed Project is assisting to advance Ireland's energy transition goals in conformity with both the current Climate Action Plan and the obligations under the Climate Act.

MASON HAYES & CURRAN LLP