

Submitted online via the web portal

The Secretary,
An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1.

26 May 2026

Dear Sir/Madam,

Third Party Objection in respect of a proposed Strategic Infrastructure Development located in County Galway, An Coimisiún Pleanála reg. ref. VA07.324162. The planning application proposes development consent for grid connection infrastructure comprising an approximately 8 km underground 220kV electricity cable route, a new 220kV electrical substation compound, and associated underground cabling, electrical infrastructure, and construction works on lands in the townlands of Rathmorrissy, Pollnagroagh, Moanbaun, Castletambert, Knocknacreeva, Caraunduff, Caherbriskaun, Lisheenkyle East, Barrettspark, Cashla, Athenry, County Galway.

We, BPS Planning & Development Consultants LTD, a firm of Irish Planning Institute accredited town planning consultants, have been retained by Athenry Peaker Plant Concern Group, c/o Chair, Oliver Freeney, Castletambert, Athenry, Co. Galway, H65RX77 [hereafter "client" or "clients"] to prepare and to lodge to An Coimisiún Pleanála [hereafter "ACP" or "the Commission"] a Third Party objection in respect of planning application, reg. ref. VA07.324162¹.

The planning application refers to the proposed development of grid connection infrastructure for the Cashla Peaker Plant (ACP Ref: 324113), comprising underground 220kV cabling, a new 220kV substation compound, extensive trenching and road-opening works, and associated permanent electrical infrastructure, on lands at Rathmorrissy, Pollnagroagh, and adjoining townlands, Athenry, County Galway.

Please find our client's Planning Objection Report attached. Section 5.0 of this report sets out 'Grounds for Objection'. For the avoidance of doubt, this letter, the attached form, the attached Planning Objection Report, and its accompanying supporting submissions comprise the extent of this planning objection.

1.0 Validation

For the purpose of validation of this objection, we note how:

- This planning application was lodged to An Coimisiún Pleanála on 27 March 2026. The final deadline for submissions of objections is Tuesday, 26 May 2026. This objection is submitted on or prior to this deadline.
- Payment of the €50 statutory fee for a third-party objection will be paid online at the web portal.
- Grounds for Objection are set out in the attached Planning Objection Report.

2.0 Oral Hearing Request

Our client requests that An Coimisiún Pleanála holds an oral hearing in respect of this application. The scale and complexity of the proposed development, the number of affected residents, the technical nature of the environmental assessment issues, and the public interest in proper scrutiny of the application warrant the convening of an oral hearing to enable full examination of the grounds for objection.

¹ <https://www.pleanala.ie/en-ie/case/324162>

3.0 Finally

We trust that everything is in order, and we look forward to receiving a refusal decision from An Coimisiún Pleanála in due course.

Best wishes,

A handwritten signature in black ink that reads "Brendan Buck". The script is cursive and fluid.

Brendan Buck MIPI
Managing Director
BPS Planning & Development Consultants LTD

Third Party Strategic Infrastructure Development Planning Objection Check List

1. Name and address of the Objector(s): Athenry Peaker Plant Concern Group, c/o Chair, Oliver Freeney, Castletambert, Athenry, Co. Galway, H65RX77.
2. If an agent is involved, state the name of the agent: Brendan Buck MIPI.
3. Address of the agent: BPS Planning Consultants LTD., PO BOX 13658, Dublin 14.
4. State the Subject Matter of the Objection: Third Party Objection in respect of a proposed Strategic Infrastructure Development located in County Galway, An Coimisiún Pleanála reg. ref. VA07.324162. The planning application proposes development consent for grid connection infrastructure comprising an approximately 8 km underground 220kV electricity cable route, a new 220kV electrical substation compound, and associated underground cabling, electrical infrastructure, and construction works on lands in the townlands of Rathmorrissey, Pollnagroagh, Moanbaun, Castletambert, Knocknacreeva, Caraunduff, Caherbriskaun, Lisheenkyle East, Barrettspark, Cashla, Athenry, County Galway.
5. Location of development: On lands in the townlands of Rathmorrissey, Pollnagroagh, Moanbaun, Castletambert, Knocknacreeva, Caraunduff, Caherbriskaun, Lisheenkyle East, Barrettspark, Cashla, Athenry, County Galway.
6. Local authority area: Galway County Council.
7. Planning authority: An Coimisiún Pleanála.
8. Planning authority register reference number: An Coimisiún Pleanála ref. VA07.324162.
9. Attach, in full, the grounds for appeal objection and the reasons, considerations and arguments on which they are based. Please find a Planning Objection Report and cover letter attached setting out the Grounds for Objection and the reasons, considerations and arguments on which they are based.
10. Enclose/Pay the correct fee for the **third** party Objection: €50.
11. Oral hearing: An oral hearing is requested.
12. Ensure that the OBJECTION is received by An Coimisiún Pleanála in the **correct manner** and in **time**. This planning application was lodged to An Coimisiún Pleanála on 27 March 2026. The final deadline for submissions of objections is Monday, 26th of May 2026. This objection is submitted on or prior to this deadline.



Planning & Development
Consultants

Third Party Planning Objection vs. an SID for Grid Connection Infrastructure in County Galway

Third Party Objection in respect of a proposed Strategic Infrastructure Development located in County Galway, An Coimisiún Pleanála reg. ref. VA07.324162. The planning application proposes development consent for grid connection infrastructure comprising an approximately 8 km underground 220kV electricity cable route, a new 220kV electrical substation compound, and associated underground cabling, electrical infrastructure, and construction works on lands in the townlands of Rathmorrissy, Pollnagroagh, Moanbaun, Castlelambert, Knocknacreeva, Caraunduff, Caherbriskaun, Lisheenkyle East, Barrettspark, Cashla, Athenry, County Galway.

This Planning Objection Report has been produced by BPS Planning & Development Consultants LTD for and on behalf of Athenry Peaker Plant Concern Group, c/o Chair, Oliver Freeney, Castlelambert, Athenry, Co. Galway, H65RX77.

Document Control Sheet

Project	Third Party Planning Objection vs. an SID for Grid Connection Infrastructure in County Galway. SID planning application reg. ref. VA07.324162.
Project No.	2026-334.
Document title	Planning Objection Report.

Contents	No. of pages
Cover page	1
Control sheet	1
Table of contents	3
Text	49
Total No. of Pages	54 (excluding appendices)

Rev.	Distribution	Author	Checked	Approved	Day	Month	Year
1	Internal	ZB	BB	FB	20	5	2026
2	Client	BB	FB	EB	20	5	2026
3	An Coimisiún Pleanála	BB	FB	EB	26	5	2026

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Date: 26 May 2026.

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Attachment 1 - Community Submission / Objection Notes to An Coimisiún Pleanála prepared by Athenry Peaker Plant Concern Group, c/o Chair, Oliver Freeney, Castlet Lambert, Athenry, Co. Galway, H65RX77.

Attachment 2 – Áine McCann BSc.(Hon) Environmental Scientist Expert Observation in respect of Strategic Infrastructure Development Planning Application VA07.324162.

1.0 Introduction

BPS Planning & Development Consultants LTD, a firm of Irish Planning Institute¹ accredited town planning consultants, have been appointed by Athenry Peaker Plant Concern Group, c/o Chair, Oliver Freeney, Castletambert, Athenry, Co. Galway, H65RX77 [hereafter "client" or "clients"] to prepare and to lodge to An Coimisiún Pleanála [hereafter "ACP"] a planning objection in respect of a proposed Strategic Infrastructure Development located in County Galway, An Coimisiún Pleanála reg. ref. VA07.324162.

The planning application proposes development consent for grid connection infrastructure comprising an approximately 8 km underground 220kV electricity cable route, a new 220kV electrical substation compound, and associated underground cabling, electrical infrastructure, and construction works on lands in the townlands of Rathmorrissy, Pollnagroagh, Moanbaun, Castletambert, Knocknacreeva, Caraunduff, Caherbriskau, Lisheenkye East, Barrettspark, Cashla, Athenry, County Galway.

The full description of development is set out on the statutory notices.

The proposed development is functionally dependent on and forms an integral part of the Cashla Peaker Plant (ACP Ref: 324113). The grid connection does not constitute standalone infrastructure but represents essential enabling works for the operation of the generating station. Accordingly, this objection must be read in conjunction with the objection lodged by the Concern Group in respect of ACP Ref: 324113, as the proposed infrastructure cannot be properly assessed in isolation from the wider integrated project.

This planning application was lodged to An Coimisiún Pleanála on the 27 March 2026. The final deadline for submissions of objections is **Tuesday, 26 May 2026**. This objection is submitted on or prior to this deadline

For the convenience of ACP, we have commented on both technical, planning law, and planning history issues prior to setting out our clients' Grounds for Objection.

This objection is structured to address the principal planning, environmental, and legal deficiencies identified in the application documentation. The grounds for objection are set out as follows:

- The Principle of the Development is not Accepted.
- Project Fragmentation and Integrated Assessment.
- Alternatives Assessment, Site Selection, and Route Selection.
- Traffic, Construction, and Road Infrastructure.
- Cumulative Infrastructure Impact – Gannow Wind Farm Grid Connection.
- Hydrogeology, Groundwater, and Water Environment.
- Landscape, Visual Impact, and Rural Character.
- Biodiversity, Ecology, and European Sites.
- Cultural Heritage, Archaeology, and Historic Landscape.
- Residential Amenity and Human Health.
- Procedural Compliance and Planning Law.

Each section identifies specific deficiencies in the EIAR, assesses the adequacy of the applicant's environmental impact assessment, and sets out the planning and environmental grounds upon which permission should be refused.

Having regard to the scale and complexity of the proposed development, and the significant deficiencies identified in the EIAR, it is respectfully requested, on behalf of the Athenry Peaker Plant Concern Group, that an oral hearing be convened to facilitate a full and proper examination of the issues arising.

We highlight the recent decision of the Supreme Court in respect of the Balz² judgement wherein it was clarified that "It is a basic element of any decision making affecting the public that relevant submissions should be addressed [by the Planning Authority] and an explanation given why they are not accepted, if indeed that is the case. This is fundamental not just to the law, but also to the trust which members of the public are required to have in decision making institutions if the individuals concerned, and the public more generally, are to be expected to accept decisions with which, in some cases, they may profoundly disagree, and with whose consequences they may have to live". We trust that the Planning Authority will give full attention to each of the issues raised within this submission.

¹ <https://ipi.ie/>

² Balz and Heubach-v- An Bord Pleanála and Cork County Council, Cleanrath Windfarms Ltd. [2019] IESC 90 Balz.

2.0 Rationale and Summary of this Objection

This Planning Objection Report has been prepared by BPS Planning & Development Consultants on behalf of Athenry Peaker Plant Concern Group in respect of Strategic Infrastructure Development planning application ACP Ref: 324162, which proposes grid connection infrastructure comprising an approximately 8 km underground 220kV electricity cable route, a new 220kV electrical substation compound, and associated underground cabling, electrical infrastructure, and construction works.

The proposed development is located on lands in the townlands of Rathmorrissey, Pollnagroagh, Moanbaun, Castlambert, Knocknacreeva, Caraunduff, Caherbriskaun, Lisheenkyle East, Barrettspark, and Cashla, Athenry, County Galway.

This application must be read in conjunction with ACP Ref: 324113 (Cashla Peaker Plant), as the proposed grid connection does not constitute standalone infrastructure but forms an integral and functionally dependent component of a single overall development project. The separation of interdependent infrastructure into multiple consent processes gives rise to significant concerns regarding project fragmentation, inadequate cumulative assessment, and the reliability of the Environmental Impact Assessment process.

Nature of the Proposed Development

The proposed development comprises high-voltage electrical connection infrastructure, including:

- An approximately 8 km underground 220kV electricity cable route traversing rural roads and agricultural lands;
- A new 220kV electrical substation compound incorporating switching equipment, control infrastructure, telecommunications mast, security fencing, and lighting columns;
- Extensive trenching, excavation, and road-opening works affecting approximately 8 km of rural road network;
- Associated construction compounds, haul routes, construction traffic movements, and temporary works;
- Permanent electrical infrastructure, access tracks, hardstanding areas, and ongoing operational requirements.
- The receiving environment comprises an established mixed rural-residential landscape characterised by ribbon development, agricultural activity, school-related traffic, commuter movement, local businesses, constrained rural roads, and high sensitivity to prolonged infrastructure disruption. The area is underlain by highly vulnerable karst limestone geology with documented groundwater sensitivity and hydrological connectivity to sensitive European sites.

Receiving Environment and Context

The proposed cable route traverses a sensitive rural environment characterised by:

- Dispersed residential properties with many dwellings in close proximity to the proposed works;
- Active agricultural land use and established rural land use patterns;
- Narrow rural road networks serving local residential, agricultural, and commuter traffic;
- Groundwater-sensitive karst limestone geology with documented hydrogeological vulnerability;
- Ecological corridors, hedgerows, and field boundaries of biodiversity significance;
- Established rural landscape character with high sensitivity to industrial infrastructure.

The applicant's own Planning Statement confirms that substantial trenching and road-opening works will be required, that full and partial road closures may occur during construction, that concurrent infrastructure works are anticipated, and that aspects of the final underground cable alignment may be subject to later adjustment.

These acknowledged uncertainties materially limit the reliability of the Environmental Impact Assessment Report as a basis for planning determination.

Core Planning and Environmental Concerns

The Concern Group has identified significant planning, environmental, and cumulative-impact concerns regarding the proposed development, including:

- The fragmented assessment and consenting of infrastructure which forms part of a single integrated project together with the generating station and associated infrastructure (ACP Ref: 324113);
- The inadequacy of cumulative and in-combination environmental assessment, particularly having regard to concurrent infrastructure works, shared corridor occupation, and cumulative impacts on the receiving environment;

- The inadequacy of the Environmental Impact Assessment in addressing the full extent of construction-related, environmental, and residential impacts associated with the cable route and substation infrastructure;
- Significant risks to groundwater and the water environment arising from trenching and construction activities within a highly vulnerable karst limestone setting;
- Potentially significant impacts on residential amenity, local communities, and rural road infrastructure arising from prolonged construction activity and permanent industrial infrastructure;
- Visual, landscape, and lighting impacts arising from the proposed substation, telecommunications mast, and associated infrastructure;
- Uncertainty regarding the final route alignment and associated environmental impacts;
- Concerns regarding the compatibility of the development with the proper planning and sustainable development of the area when considered in conjunction with the wider Cashla Peaker Project.
- The cumulative effect of unresolved design detail, deferred technical assessment, unresolved infrastructure interaction, incomplete cumulative assessment, and acknowledged uncertainty materially limits the reliability of the EIAR as a basis for environmental assessment and planning determination.

Grounds for Objection – Summary

The Concern Group respectfully submits that the proposed development gives rise to serious planning, environmental, residential, and cumulative-impact concerns which have not been adequately addressed within the application documentation. This objection is structured to address the following principal grounds:

1. Project Fragmentation and Integrated Assessment

The proposed grid connection infrastructure is functionally dependent on and forms an integral part of the wider Cashla Peaker Project (ACP Ref: 324113). The separation of interdependent infrastructure into multiple consent processes gives rise to project fragmentation, inadequate cumulative assessment, and failure to properly assess the development as a single integrated project. This represents a fundamental deficiency in the environmental assessment process and fails to comply with the requirements of the EIA Directive.

2. Cumulative and In-Combination Environmental Effects

The EIAR fails to adequately assess cumulative and in-combination effects arising from concurrent infrastructure works, shared corridor occupation, cumulative traffic impacts, overlapping construction programmes, and the interaction of multiple infrastructure projects within the receiving environment. The assessment does not properly consider the cumulative industrialisation of the rural landscape or the combined impacts on residential amenity, ecological receptors, groundwater systems, and community infrastructure.

3. Hydrogeology, Groundwater, and Water Environment

The proposed development is located within a highly vulnerable karst limestone environment characterised by documented groundwater sensitivity, rapid groundwater flow pathways, and hydrological connectivity to sensitive European sites. The EIAR fails to adequately assess the risks to groundwater quality and quantity arising from extensive trenching, excavation, dewatering, concrete placement, and the potential for contamination pathways. The assessment does not demonstrate that significant adverse effects on the water environment can be avoided or adequately mitigated.

4. Traffic, Construction Disruption, and Community Impact

The proposed cable route traverses approximately 8 km of narrow rural roads serving residential, agricultural, school, and commuter traffic. The EIAR fails to adequately assess the scale and duration of traffic disruption, road closures, construction traffic impacts, and effects on residential amenity arising from prolonged trenching and road-opening works. The assessment does not demonstrate that construction works can be undertaken without giving rise to significant adverse effects on road safety, emergency access, community connectivity, and residential quality of life.

5. Landscape, Visual Impact, and Rural Character

The proposed 220kV substation compound, telecommunications mast, security fencing, lighting columns, and associated infrastructure will introduce large-scale industrial development into an open rural landscape of high sensitivity. The EIAR adopts an inappropriately constrained study area and fails to adequately assess the scale, prominence, and long-term visual effects of permanent electrical infrastructure. The assessment does not properly consider cumulative landscape impacts or the progressive industrialisation of the rural environment.

6. Biodiversity, Ecology, and European Sites

The proposed development has the potential to affect sensitive ecological receptors through habitat loss, hedgerow removal, disturbance to fauna, and indirect effects arising from groundwater pathways and surface water connectivity. The Appropriate Assessment Screening and Natura Impact Statement fail to adequately assess potential pathways linking the development to European sites, particularly via groundwater systems within the karst limestone environment. The assessment does not demonstrate that significant effects on European sites can be excluded.

7. Cultural Heritage, Archaeology, and Historic Landscape

The proposed development is located within the historic hinterland of Athenry, a heritage town of national significance. The EIAR adopts an overly narrow interpretation of cultural heritage and fails to adequately assess impacts on historic landscape character, setting of heritage assets, and the relationship between the town and its rural hinterland. The assessment does not properly consider the potential for subsurface archaeological remains or impacts on the historic context of the receiving environment.

8. Residential Amenity and Human Health

The proposed development will give rise to significant impacts on residential amenity arising from construction noise, vibration, dust, traffic disruption, visual intrusion, and loss of rural amenity. The EIAR fails to adequately assess the scale, duration, and cumulative nature of construction-related impacts on residential receptors in close proximity to the cable route and substation. The assessment does not demonstrate that residential amenity can be protected or that significant adverse effects on human health and wellbeing can be avoided.

9. Procedural Compliance and Planning Law

The proposed development fails to comply with the requirements of national and European planning and environmental law, including the EIA Directive, the Habitats Directive, the Water Framework Directive, and relevant national planning policy. The separation of interdependent infrastructure, inadequate cumulative assessment, and unresolved environmental uncertainties undermine the reliability of the environmental assessment process and fail to provide a proper basis for planning determination.

Conclusion

Our client respectfully submits that the proposed development gives rise to serious planning, environmental, residential, and cumulative-impact concerns which have not been adequately addressed within the application documentation. In particular, significant concerns remain regarding:

- Project fragmentation and the separation of interdependent infrastructure into multiple consent processes;
- The inadequacy of cumulative and in-combination environmental assessment;
- Groundwater vulnerability and hydrogeological risk within a sensitive karst limestone environment;
- Prolonged construction disruption arising from trenching, road-opening works, and associated infrastructure activity;
- Uncertainty regarding the final route alignment and associated environmental impacts;
- Long-term landscape, visual, and lighting impacts arising from permanent electrical infrastructure; and
- The cumulative industrialisation of the surrounding rural environment.

The proposed development cannot be properly assessed in isolation from the wider integrated Cashla Peaker Project and associated infrastructure. When assessed cumulatively, the identified environmental, infrastructural, procedural, and community impacts materially outweigh the limited and insufficiently justified planning benefits associated with the proposed development.

Accordingly, An Coimisiún Pleanála cannot be satisfied that the proposed development would be consistent with the proper planning and sustainable development of the area or that significant adverse environmental effects have been adequately identified, assessed, and mitigated.

In these circumstances, the proposal has not been shown to be acceptable in principle or in practice, and it is respectfully submitted that planning permission should be refused.

3.0 Location and Description of the Subject Site

The Proposed Development site is located in County Galway. The proposed 220kV substation compound are 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.

The Proposed Development site comprises an area of approximately 12.11 hectares and is located within the townlands of Rathmorrissy, Pollnagroagh, Moanbaun, Castletambert, 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 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.

The proposed cable route traverses a sensitive rural environment characterised by dispersed residential development, active agricultural land use, narrow rural road networks, and groundwater-sensitive karst limestone geology. The receiving environment is not a remote or undeveloped area but rather an established mixed rural-residential landscape with the following characteristics:

- Ribbon development along rural roads with residential properties in close proximity to the proposed works;
- Active agricultural holdings and established farming operations;
- Local road network serving residential, agricultural, school, and commuter traffic;
- Highly vulnerable karst limestone geology with documented groundwater sensitivity;
- Ecological corridors, hedgerows, and field boundaries;
- Heritage context within the rural hinterland of Athenry, a heritage town of national significance; and
- High sensitivity to prolonged infrastructure disruption and industrial development.

The applicant's Planning Statement acknowledges that substantial trenching and road-opening works will be required, that full and partial road closures may occur during construction, that concurrent infrastructure works are anticipated, and that aspects of the final cable alignment may be subject to later adjustment. These acknowledged uncertainties materially limit the reliability of the Environmental Impact Assessment Report (EIAR) as a basis for planning determination.

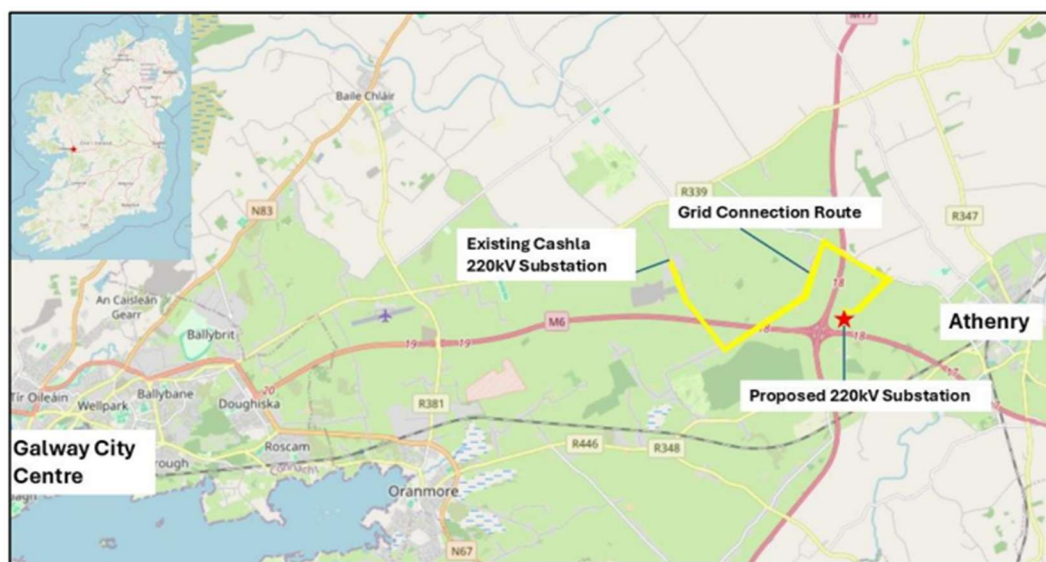


Fig. 1: Site Context Map (Source: Planning File)

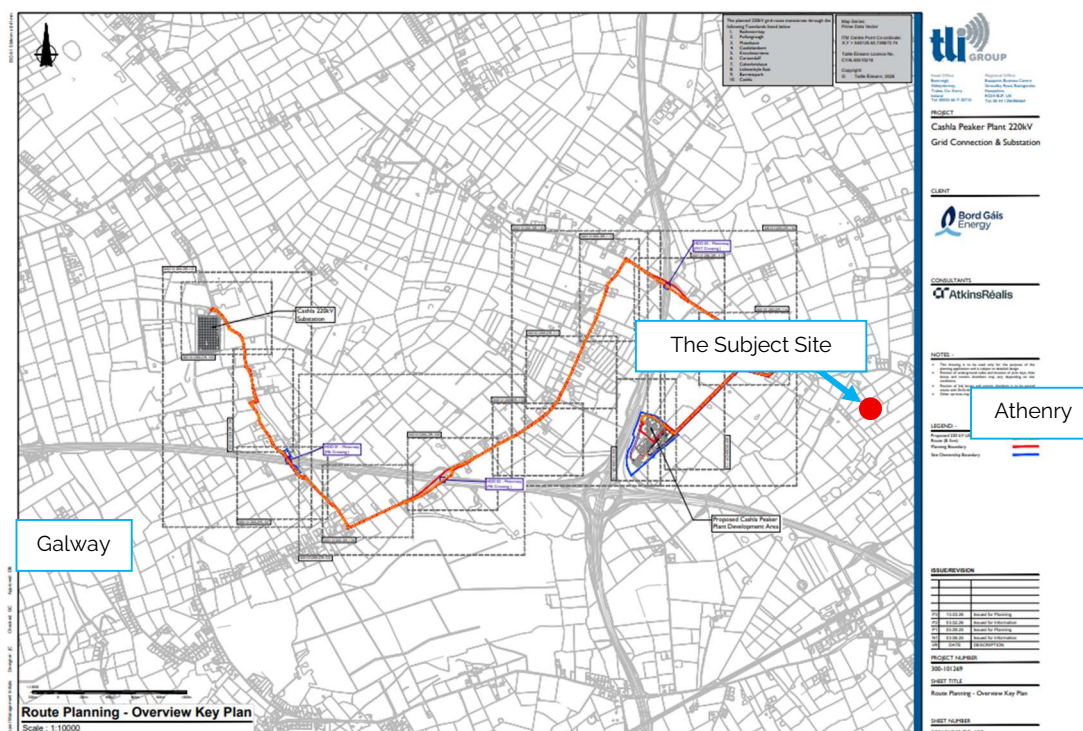


Fig. 2: Site Location Map (Source: Planning File)

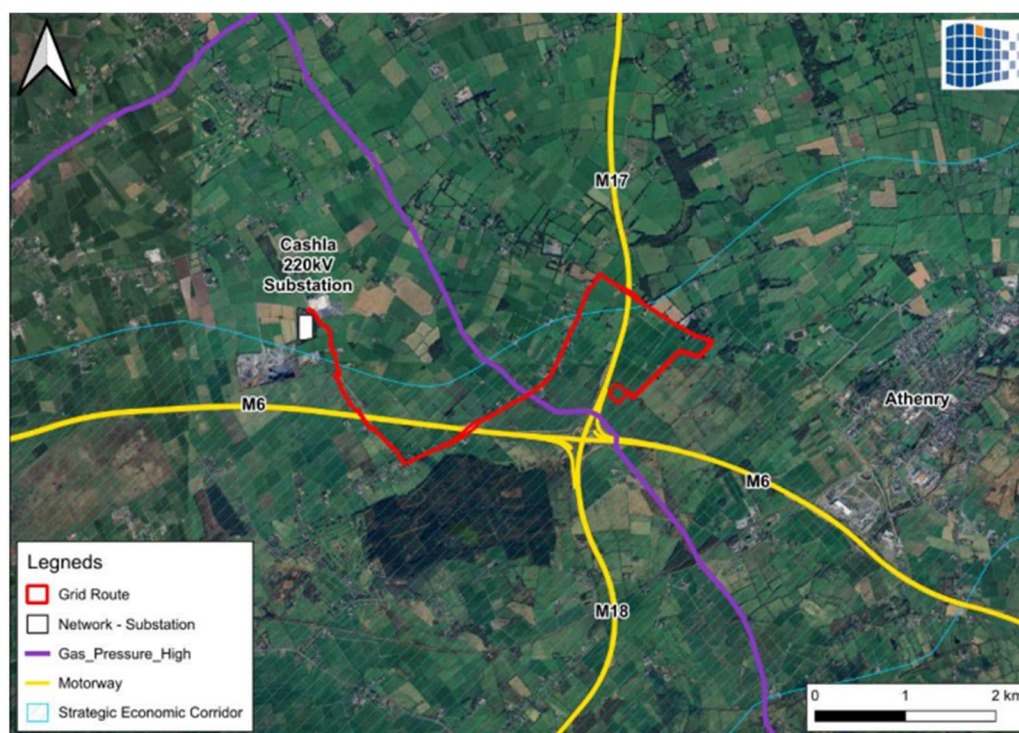


Fig. 3: Site Context Aerial Photograph (Source: Planning File)

3.1 Functional Dependency on the Cashla Peaker Project

The proposed grid connection infrastructure exists solely to facilitate the operation of the Cashla Peaker Plant. The applicant's own documentation confirms this functional dependency:

- The grid connection has no independent function or purpose separate from the generating station;
- The infrastructure would not be proposed in the absence of the peaker plant;
- The cable route, substation location, and design parameters are entirely determined by the requirements of the generating station;

- The construction programme and operational requirements are intrinsically linked to the peaker plant project timeline; and
- The economic justification for the development relies entirely on the operation of the generating station.

Notwithstanding this clear functional dependency, the applicant has separated interdependent infrastructure into two distinct consent applications. This project fragmentation raises significant concerns regarding the adequacy of environmental assessment, cumulative impact analysis, and compliance with the EIA Directive. These concerns are addressed in detail in Section 2.0 of this objection.

4.0 Proposed Development

The statutory notices state the following.

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 Rathmorrissey (Townland), Athenry, Co. Galway and the construction of 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 Rathmorrissey, Pollnagroagh, Moanbaun, Castlelambert, Knocknacreeva, Caraunduff, Caherbriskaun, Lisheenkye 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 Rathmorrissey (Townlands), Athenry, Co. Galway which is the subject of a separate Strategic Infrastructure Development application to An Coimisiún Pleanála (Ref. ACP324113-26) 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 Rathmorrissey, 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.

5.0 Grounds for Objection

It is submitted to An Coimisiún Pleanála that there are very significant concerns with the proposed development and its potential impact on the residential amenities of our clients' properties, on the safety of the local road network, and on the local area. Our clients consider the key issues to be set out below.

5.1 Ground 1: The Principle of the Development is not Accepted

It is submitted that the proposed development is not acceptable in principle at this location, having regard to the provisions of the Galway County Development Plan 2022–2028, the characteristics of the receiving environment, and the requirements of proper planning and sustainable development.

While the applicant asserts that the principle of the development is established by virtue of its location within the Oranmore–Athenry Strategic Economic Corridor (SEC), its proximity to existing electricity and gas infrastructure, and its alignment with national and regional energy objectives, this position represents an overly simplistic and selective interpretation of the relevant policy framework.

The acceptability of development in an unzoned rural area is not determined solely by reference to strategic designations or infrastructure proximity, but must instead be assessed on the basis of a holistic evaluation of site suitability, environmental constraints, and the potential for adverse impacts on residential amenity and human health. In this regard, the County Development Plan is clear that support for infrastructure development is expressly qualified, and contingent upon the protection of environmental quality, landscape, and residential amenity.

As set out in the sections that follow, the proposed development gives rise to significant concerns in respect of its proximity to established residential receptors, the intensity and nature of the development, and the potential for adverse impacts across multiple environmental pathways. These matters are not peripheral considerations, but go to the core question of whether the development is appropriate at this location.

Accordingly, it is submitted that the applicant has failed to demonstrate that the principle of the proposed development is acceptable, and that the reliance on high-level policy support, in the absence of a robust assessment of site-specific constraints, is fundamentally flawed.

5.1.1 Misinterpretation of strategic economic corridor (SEC) policy

The applicant places significant reliance on Policy Objective EL2 of the Galway County Development Plan, which seeks to support the Oranmore–Athenry Strategic Economic Corridor as a location for nationally and regionally significant activities, including infrastructure which may not be appropriate within or in close proximity to centres of population.

Policy EL 2 states:

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 ...*

However, it is submitted that this policy has been misinterpreted and misapplied in the context of the proposed development.

Firstly, Policy Objective EL2 does not provide blanket support for all forms of infrastructure within the Strategic Economic Corridor. Rather, it requires that such development be accommodated on sites of **appropriate size and location**, having regard to the nature of the development and the characteristics of the receiving environment. The policy must therefore be read as **conditional and criteria-based**, rather than permissive.

Secondly, the applicant's reliance on the phrase "*which would not be appropriate in proximity to centres of population*" is misplaced. This provision does not imply that such development is automatically appropriate in rural or unzoned areas. On the contrary, it reflects the need to carefully site such infrastructure in locations where it will not give rise to adverse impacts on sensitive receptors, including residential properties and community facilities.

In the present case, the evidence presented within the EIAR demonstrates that the site is not removed from sensitive receptors, but is instead located within an established rural residential environment. A substantial number of dwellings are located within close proximity to the site, together with a range of other sensitive receptors in the wider area, including educational and healthcare facilities.

In this context, the site cannot reasonably be characterised as being “*away from centres of population*” in any meaningful planning sense. The presence of a dispersed rural population does not diminish sensitivity; rather, it gives rise to a pattern of development where individual dwellings are highly susceptible to localised impacts.

Furthermore, Policy Objective EL2 must be read in conjunction with other provisions of the County Development Plan, including those relating to environmental protection and residential amenity. In particular, Policy Objective EG2 supports the delivery of electricity and gas infrastructure “**subject to environmental quality, landscape, wildlife, habitats, and residential amenity.**” These are not secondary considerations, but fundamental criteria which must be satisfied in order for development to be considered acceptable.

The applicant’s interpretation of the Strategic Economic Corridor designation fails to engage with these qualifying provisions and instead seeks to elevate the policy to a form of strategic justification for development at this location. This approach is not supported by the wording or intent of the Development Plan.

Accordingly, it is submitted that the reliance on Policy Objective EL2 as establishing the acceptability of the proposed development in principle is misplaced. When properly interpreted, the policy does not support the siting of a large-scale combustion-based energy facility in close proximity to residential receptors, and the proposed development is therefore contrary to the proper application of the County Development Plan.

5.1.2 Site is not remote and is characterised by a high density of sensitive receptors

A central premise underpinning the applicant’s justification of the proposed development is that the site is suitably located “away from centres of population” and therefore appropriate for a development of this nature. This assertion is not supported by the evidence contained within the EIAR and represents a mischaracterisation of the receiving environment. The EIAR clearly establishes that the subject site is located within a settled rural landscape, characterised not by isolation, but by a pattern of dispersed one-off housing and established residential clusters. While the area may not constitute a defined urban centre, it nevertheless contains a significant number of sensitive receptors within close proximity to the site.

Accordingly, the evidence before the Commission clearly demonstrates that the subject site is receptor-rich rather than remote, and that the applicant’s reliance on the absence of a defined settlement boundary to characterise the site as suitable for large-scale energy infrastructure is fundamentally misplaced.

This proximity further undermines any suggestion that the site is remote or isolated in planning terms, and instead confirms that it forms part of a wider settled and functionally connected hinterland.

Furthermore, while the EIAR describes the area as “relatively rural” with a “limited range of built assets”, this characterisation must be considered in context.

The absence of dense urban form does not equate to an absence of sensitivity. On the contrary, dispersed rural housing patterns give rise to a situation where individual dwellings are often located in close proximity to proposed development sites, with limited buffering or screening, thereby increasing susceptibility to adverse effects.

In this regard, the Planning Authority and ACP have consistently recognised that rural dwellings are not less sensitive receptors by virtue of their location. The expectation of a high standard of residential amenity applies equally in rural areas, and in many cases is heightened due to the generally low baseline levels of noise, light, and air pollution.

The evidence presented within the EIAR therefore clearly demonstrates that the subject site is receptor-rich rather than remote. The applicant’s reliance on the absence of a defined settlement boundary or zoning designation to characterise the site as suitable for large-scale energy infrastructure is fundamentally flawed.

Accordingly, it is submitted that the proposed development is not located in an area that can reasonably be described as “away from centres of population” or free from sensitive receptors. On the contrary, it is located within an established residential environment where the potential for adverse impacts on human health and amenity is both real and significant.

5.1.3 Industrialisation of a rural area

It is submitted that the proposed development represents a significant and inappropriate industrialisation of a rural landscape, which is fundamentally at odds with the existing character of the area and the established pattern of development.

The receiving environment, as described within the EIAR, is characterised as a "relatively rural area" with a dispersed settlement pattern comprising one-off housing, agricultural lands, and limited localised commercial activity.

This is not an area that has an established industrial or energy generation character, nor is it one that has been identified for such intensive forms of development.

Furthermore, the applicant's reliance on the Strategic Economic Corridor designation to justify this level of development fails to recognise that such designations do not override the fundamental requirement to ensure that development is compatible with its receiving environment.

The County Development Plan does not support the indiscriminate siting of large-scale industrial infrastructure within rural areas, particularly where such development would adversely affect residential amenity and environmental quality. Rather, policy support for infrastructure is expressly conditional, and must be considered in the context of site-specific constraints and sensitivities.

In the present case, the introduction of a large-scale gas-fired power plant into a receptor-rich rural area represents a clear overdevelopment of the site and a misalignment between land use and location.

Accordingly, it is submitted that the proposed development would result in the industrialisation of a rural area, giving rise to unacceptable impacts on the character of the landscape and the amenity of existing residents, and is therefore contrary to the proper planning and sustainable development of the area.

5.1.4 Infrastructure proximity does not equate to site suitability

The applicant places significant reliance on the proximity of the site to existing strategic infrastructure, including the Cashla 220kV Substation and the Galway–Mayo Gas Transmission Pipeline (BGE/85), in order to justify the suitability of the proposed development at this location.

While it is acknowledged that access to existing electricity and gas infrastructure is a relevant planning consideration, it is submitted that the applicant has afforded this factor disproportionate weight, and has incorrectly presented infrastructure proximity as determinative of site suitability.

In this regard, proximity to infrastructure is only one element of a broader site selection and planning assessment. It does not, in and of itself, establish that a site is appropriate for large-scale industrial development, nor does it override the requirement to ensure that development is compatible with its receiving environment.

The Planning Statement asserts that the availability of grid and gas connections allows for efficient integration of the proposed development without the need for extensive off-site infrastructure. However, this represents a technical and operational advantage, rather than a land-use planning justification.

Critically, no evidence has been presented to demonstrate that the subject site represents the most appropriate location for the proposed development when considered against alternative sites that may offer:

- Greater separation distances from residential receptors;
- Lower environmental sensitivity; and
- A more established industrial or infrastructural character.

Instead, the applicant's approach appears to have been driven primarily by engineering convenience, rather than a robust assessment of environmental capacity or land-use compatibility.

This approach is inconsistent with the principles of proper planning and sustainable development, which require that infrastructure projects of this scale be plan-led and site-appropriate, rather than opportunistically located based on existing connections.

Furthermore, the reliance on infrastructure proximity fails to engage with the clear evidence of receptor sensitivity in the surrounding area, as outlined above. The presence of a substantial number of residential dwellings within close proximity to the site fundamentally undermines any argument that the site is suitable for intensive energy infrastructure, regardless of its connection to the gas and electricity networks.

It is also noteworthy that the existence of strategic infrastructure within an area does not, in itself, confer an industrial zoning or designation, nor does it imply that surrounding lands are appropriate for further industrialisation. To suggest otherwise would set an undesirable precedent whereby the presence of linear infrastructure (such as pipelines or transmission lines) could be used to justify the incremental expansion of incompatible land uses into rural and residential areas.

In this context, the applicant's reliance on infrastructure proximity represents a misapplication of planning principles, whereby a secondary consideration is elevated to a primary justification.

Accordingly, it is submitted that the proximity of the site to existing gas and electricity infrastructure does not render the site suitable for the proposed development, and that this factor cannot outweigh the significant concerns identified in respect of residential amenity, environmental sensitivity, and land-use compatibility.

5.1.5 Failure to properly assess reasonable alternatives

It is submitted that the Environmental Impact Assessment Report (EIAR) fails to provide an adequate, transparent and reasoned assessment of reasonable alternatives, as required under the EIA Directive and associated Irish legislation. The consideration of alternatives is a central component of the EIA process and must demonstrate that the proposed development represents the most appropriate option having regard to environmental constraints, land-use compatibility and the protection of sensitive receptors. In this instance, the assessment presented is limited in scope, constrained in geographic extent, and lacking in any meaningful comparative analysis.

The methodology adopted relies heavily on a desktop review of environmental constraints, including datasets from NPWS, EPA, GSI and other sources. While appropriate as an initial screening tool, this approach does not extend to a structured or evidence-based comparison of sites. There is no indication that the identified options were assessed against consistent criteria, nor that any weighting or balancing of environmental, social or land-use factors was undertaken. The absence of any comparative framework means that the process does not demonstrate why the selected site is preferable, or whether it represents the least environmentally damaging option.

The deficiencies in this approach are further illustrated by the manner in which identified constraints have been applied. The EIAR identifies a range of constraints affecting alternative sites, including ecological sensitivities, karst limestone, archaeological features and proximity to designated sites. However, there is no evidence that these same constraints have been applied consistently or rigorously to the selected site. In effect, constraints appear to have been used selectively to exclude alternatives, rather than as part of a balanced and objective site appraisal.

Furthermore, the assessment of alternatives does not include any meaningful comparative analysis of grid alternatives, alternative locations, technologies, or configurations. The EIAR does not quantify or compare lifecycle emissions, emissions intensity, or cumulative climate impacts over the operational lifetime of the development. This omission represents a failure to comply with Article 5 of the EIA Directive, which requires the assessment of reasonable alternatives having regard to environmental effects, including climate change. In the absence of such analysis, the competent authority cannot determine whether the proposed development represents a climate-compliant or least-harm option. The EIAR does not provide sufficient information to enable the competent authority to determine whether the proposed development complies with its statutory obligations under Section 15(1) of the Climate Action and Low Carbon Development Act 2015. In particular, there is no assessment of the compatibility of the proposed development with carbon budgets, sectoral emissions ceilings, or the national climate objective. This represents a fundamental deficiency in the EIAR, as the competent authority cannot lawfully grant permission in the absence of sufficient information to demonstrate compliance with these binding climate obligations.

Having regard to the foregoing, it is submitted that the assessment of reasonable alternatives is inadequate, lacks transparency, and does not comply with the requirements of the EIA Directive. The failure to undertake a robust and evidence-based site selection process represents a fundamental deficiency which undermines the integrity of the environmental assessment as a whole and prevents the competent authority from reaching a properly informed conclusion on the acceptability of the proposed development at this location.

5.1.6 Ground 1 - Conclusion

Having regard to the foregoing, it is submitted that the proposed development is not acceptable in principle at this location and fails to accord with the proper planning and sustainable development of the area.

The applicant's justification for the development is overly reliant on high-level policy support, the Strategic Economic Corridor designation, and proximity to existing infrastructure. However, as demonstrated

throughout this section, these factors have been **misinterpreted, overstated, and applied in isolation**, without due regard to the specific characteristics and sensitivities of the receiving environment.

In particular, the evidence clearly establishes that the site is **not remote**, but is instead located within a receptor-rich rural area characterised by a significant number of residential dwellings and community facilities in close proximity. The introduction of a large-scale, combustion-based energy facility in such a context would result in the **industrialisation of a rural landscape**, giving rise to clear land-use incompatibility and unacceptable risks to residential amenity and human health.

Furthermore, the applicant's reliance on proximity to gas and electricity infrastructure as justification for the chosen site is fundamentally flawed. While such proximity may offer operational efficiencies, it does not constitute an adequate planning rationale. There must be **more to site selection than technical convenience or financial benefit to the developer**. The location of strategic energy infrastructure must be informed by a robust, plan-led approach that prioritises environmental protection, appropriate separation from sensitive receptors, and long-term sustainability. To suggest otherwise would imply that such developments could be located wherever infrastructure happens to exist, which is clearly not consistent with established planning principles.

The failure to undertake a meaningful assessment of reasonable alternatives further undermines the applicant's position, as it has not been demonstrated that this site represents the most appropriate or least environmentally sensitive option.

Finally, the proposed development does not satisfy the qualifying criteria of the County Development Plan, including the requirement that infrastructure be delivered **subject to the protection of environmental quality and residential amenity**, nor does it appropriately address the implications of its SEVESO classification in a receptor-rich environment.

Accordingly, it is submitted that the proposed development is inappropriate in principle at this location, and that permission should be refused.

5.2 Ground 2: Project Fragmentation and Integrated Assessment

5.2.1 Introduction

The proposed grid connection infrastructure is functionally dependent on and forms an integral component of the wider Cashla Peaker Project (ACP Ref: 324113). The separation of interdependent infrastructure into multiple consent processes gives rise to project fragmentation, inadequate cumulative assessment, and failure to properly assess the development as a single integrated project.

This represents a fundamental deficiency in the environmental assessment process and fails to comply with the requirements of the Environmental Impact Assessment Directive (Directive 2011/92/EU as amended by Directive 2014/52/EU). The European Court of Justice has consistently held that Member States may not use fragmented consent procedures to circumvent the requirements for integrated environmental assessment of projects which form a functional whole.

5.2.2 Evidence of Functional Integration

The applicant's documentation provides clear evidence that the grid connection and generating station constitute a single integrated project.

The Planning Statement accompanying ACP Ref: 324162 explicitly confirms the relationship between the two applications stating: "This application should be read in conjunction with ACP Ref: 324113 (Cashla Peaker Plant), as the proposed grid connection does not constitute standalone infrastructure but forms an integral and dependent component of a single overall project."

This statement confirms that:

- The grid connection is not standalone infrastructure;
- It forms an "integral and dependent component" of the peaker plant;
- The infrastructure constitutes a "single overall project";
- The applications cannot be properly assessed in isolation.
- 2.2.2 Functional Dependency
- The grid connection exists solely to facilitate the operation of the Cashla Peaker Plant. The infrastructure has no independent purpose or function separate from the generating station. Key indicators of functional dependency include:
 - The cable route connects the peaker plant site directly to the existing Cashla 220kV substation;
 - The design parameters (voltage, capacity, alignment) are entirely determined by the generating station requirements;
 - The construction programme is intrinsically linked to the peaker plant development timeline;

- The economic justification relies entirely on the operation of the generating station; and
- The grid connection would not be proposed in the absence of the peaker plant.

This functional dependency demonstrates that the grid connection and generating station constitute a single integrated development project rather than separate, standalone infrastructure proposals.

5.2.3 Legal and Policy Framework

EIA Directive Requirements

Article 2(1) of the EIA Directive requires that projects are assessed "before consent is given" and that the assessment takes account of "the direct and indirect significant effects of a project". Article 3(1) further requires assessment of cumulative effects with other existing and/or approved projects.

The European Court of Justice has consistently held that Member States may not use fragmented consent procedures to circumvent the requirements for integrated environmental assessment. In Case C-227/01 (Commission v Spain), the Court held that the division of a project into separate components for the purposes of avoiding the requirement for environmental impact assessment constitutes a breach of the Directive.

In Case C-392/96 (Commission v Ireland), the Court confirmed that where multiple elements form part of a single project, they must be assessed together as an integrated whole, stating: "The splitting up of projects may not be used to avoid the application of [EIA requirements] where the projects are intrinsically connected."

Irish Planning Law

Section 146B(3)(b) of the Planning and Development Act 2000 (as amended) requires that applications for Strategic Infrastructure Development shall include "an environmental impact assessment report" prepared in accordance with the EIA Directive.

Section 176(1) provides that An Coimisiún Pleanála may refuse permission where a proposed development would contravene the provisions of the Development Plan, would be contrary to the proper planning and sustainable development of the area, or would give rise to significant effects on the environment.

The separation of functionally dependent infrastructure into multiple consent applications undermines the reliability of the environmental assessment process and fails to provide a proper basis for planning determination in accordance with these statutory requirements.

5.2.4 Consequences of Project Fragmentation

The separation of interdependent infrastructure into multiple consent processes gives rise to the following deficiencies:

Inadequate Cumulative Assessment

The EIAR for ACP Ref: 324162 does not adequately assess cumulative and in-combination effects arising from the operation of both the grid connection and the generating station. Critical cumulative impacts which have not been properly assessed include:

- Combined construction traffic impacts on the rural road network;
- Overlapping construction programmes and concurrent infrastructure works;
- Cumulative landscape and visual effects of multiple industrial installations;
- Combined effects on groundwater systems and surface water quality;
- Cumulative impacts on ecological receptors and European sites;
- Combined residential amenity impacts arising from prolonged construction activity; and
- Long-term cumulative industrialisation of the rural landscape.

The assessment of these cumulative effects cannot be properly undertaken through separate, standalone EIARs for functionally dependent infrastructure. The fragmented assessment approach results in an incomplete and unreliable basis for environmental decision-making.

Incomplete Alternatives Assessment

The EIA Directive requires that applicants provide "an outline of the main alternatives studied by the developer and an indication of the main reasons for the selection, taking into account the environmental effects". This requirement cannot be properly satisfied through fragmented consent applications.

For the Cashla Peaker Project as a whole, alternative locations for the generating station would necessarily result in different grid connection requirements, routes, and environmental effects. Similarly, alternative grid connection routes would have implications for the feasibility and environmental impacts of the generating station location.

The separation of infrastructure into multiple applications precludes meaningful assessment of integrated alternatives and prevents proper evaluation of whether the proposed development as a whole represents the most appropriate environmental solution.

Undermining Public Participation

The fragmentation of a single integrated project into multiple consent applications undermines the effectiveness of public participation in the environmental decision-making process. Members of the public are required to engage with multiple, parallel planning processes in order to properly understand and respond to the full environmental implications of the proposed development.

This places an unreasonable burden on local communities and fails to provide an effective mechanism for integrated public consultation on the project as a whole. The approach is inconsistent with the public participation requirements of the Aarhus Convention and the EIA Directive.

Piecemeal Consent and Regulatory Risk

The separation of infrastructure into multiple consent applications creates the potential for piecemeal consent, whereby one element of an integrated project may be granted permission while another element is refused or subject to material conditions.

In the present case

- If permission were granted for the grid connection (ACP 324162) but refused for the peaker plant (ACP 324113), the result would be consented infrastructure with no functional purpose;
- If permission were granted for the peaker plant but refused for the grid connection, the generating station could not operate;

If materially different conditions were attached to each consent, the integrated operation of the project could be compromised.

These scenarios demonstrate the inherent deficiencies in the fragmented consent approach and the need for integrated assessment and determination of functionally dependent infrastructure.

5.2.5 Subsequent Information Relating to the Integrated Project

Since the lodgement of the applications, additional information has emerged which further demonstrates the integrated nature of the proposed development and the inadequacy of the fragmented assessment approach.

Shared Construction Methodology

The construction methodology for the grid connection infrastructure is intrinsically linked to the peaker plant construction programme. The applicant's documentation indicates that:

- Construction compounds will serve both the grid connection works and the peaker plant development;
- Haul routes will be shared between the two elements of the project;
- Construction traffic associated with both developments will utilise the same rural road network; and
- The timing of cable installation works is dependent on progress with the peaker plant construction;
- The grid connection cannot be commissioned independently of the generating station.

These shared construction arrangements cannot be properly assessed or managed through separate, standalone consent applications. The cumulative construction impacts require integrated assessment and coordinated mitigation.

Economic and Financial Integration

The economic justification for the grid connection infrastructure is entirely dependent on the operation of the peaker plant. The applicant has not demonstrated:

- That the grid connection has any independent economic viability;
- That the infrastructure would be developed in the absence of the generating station;
- That the project financing arrangements treat the grid connection as a standalone investment; and
- That decommissioning costs have been separately allocated to each element of the integrated project.

This economic integration further confirms that the grid connection and generating station constitute a single development project which should be assessed and consented as an integrated whole.

5.2.6 Conclusion - Project Fragmentation

Our client respectfully submits that the proposed grid connection infrastructure (ACP Ref: 324162) and the Cashla Peaker Plant (ACP Ref: 324113) constitute a single integrated development project which has been inappropriately separated into multiple consent applications.

This project fragmentation:

- Fails to comply with the requirements of the EIA Directive for integrated environmental assessment;
- Results in inadequate assessment of cumulative and in-combination effects;
- Precludes meaningful evaluation of project alternatives;
- Undermines effective public participation in the decision-making process;
- Creates the potential for piecemeal consent with resultant regulatory and operational risks; and
- Fails to provide a reliable basis for environmental decision-making in accordance with Irish and European planning law.

Accordingly, An Coimisiún Pleanála cannot be satisfied that the environmental assessment process has been properly conducted or that the planning application provides an adequate basis for environmental consent. Permission for the proposed development should be refused on this ground alone.

5.3 Ground 3: Alternatives Assessment, Site Selection, and Route Selection

5.3.1 Introduction and Legal Framework

Article 5(1)(d) of the EIA Directive requires that an EIAR includes "a description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects".

This requirement serves a critical function within the environmental assessment process. The consideration of alternatives enables:

- Identification of less environmentally damaging options;
- Demonstration that the proposed development represents an appropriate environmental solution;
- Transparency in decision-making regarding site selection and design;
- Meaningful public participation in the evaluation of different options; and
- Compliance with the overarching principle of environmental protection.

The European Court of Justice has confirmed that the alternatives assessment must be robust, transparent, and undertaken at an appropriate stage in the project development process. In Case C-348/15 (Stadt Wiener Neustadt), the Court held that alternatives must be "studied" rather than merely identified, and that the assessment must provide sufficient detail to enable proper evaluation of environmental effects.

5.3.2 Infrastructure-Led Site Selection

The EIAR acknowledges that the site selection process for the substation compound was determined by the location of existing electrical infrastructure. Specifically:

The substation must be located in proximity to the existing Cashla 220kV substation;
The peaker plant location was determined prior to assessment of substation alternatives;
The cable route is constrained by the fixed start point (peaker plant) and end point (Cashla substation); and
No assessment was undertaken of alternative generating station locations which might result in different grid connection requirements.

This infrastructure-led approach to site selection means that the alternatives assessment was constrained from the outset by prior decisions regarding the location of the generating station. The EIAR does not demonstrate that these prior decisions were themselves subject to proper alternatives assessment or that the integrated project represents the most appropriate environmental solution.

Substation Location Assessment

The applicant identifies four potential substation locations in the EIAR:

- Site A: Adjacent to the existing Cashla substation (north);

- Site B: Adjacent to the existing Cashla substation (south);
- Site C: Within the peaker plant site boundary; and
- Site D: At an intermediate location along the cable route.

However, the EIAR does not provide a comparative environmental assessment of these four options. Instead, the applicant relies on the following selection criteria:

- Proximity to existing infrastructure;
- Landowner willingness to facilitate development;
- Avoidance of residential receptors; and
- Technical feasibility and cost considerations.

The reliance on these criteria, without comparative environmental assessment, undermines the alternatives analysis and fails to demonstrate that the selected option represents the most appropriate environmental solution. In particular:

- No quantified comparison of landscape and visual impacts is provided;
- No assessment of differential groundwater risks between sites is presented;
- No evaluation of alternative cable route requirements arising from different substation locations;

No consideration of cumulative landscape effects arising from clustering of electrical infrastructure. The absence of comparative environmental assessment means that the Commission cannot be satisfied that the proposed substation location represents the option with the least environmental impact.

5.3.3 Cable Route Selection – Multi-Criteria Analysis Deficiencies

The EIAR presents a Multi-Criteria Analysis (MCA) of seven cable route options connecting the peaker plant site to the existing Cashla substation. The Concern Group has identified significant deficiencies in this assessment which undermine its reliability and fail to demonstrate that the selected route represents the most appropriate environmental solution.

All Routes Found "Broadly Comparable"

A critical acknowledgement within the EIAR route selection assessment is that all seven routes were found to be "broadly comparable" in environmental terms. The applicant states: "All route options were assessed as broadly comparable from an environmental perspective, with no route demonstrating clear environmental superiority across all assessment criteria."

This finding raises fundamental questions regarding the robustness of the route selection process:

- If all routes are broadly comparable, the selection criteria must be insufficiently sensitive to differentiate between options;
- The finding suggests that environmental considerations did not meaningfully inform the route selection decision;
- The assessment fails to identify a "least environmental impact" option as required by the EIA Directive; and
- The conclusion undermines confidence in the MCA methodology and its application.

Where an alternatives assessment concludes that options are broadly equivalent, it typically indicates either that the assessment criteria are too coarse to properly differentiate impacts, or that insufficient environmental investigation has been undertaken to enable meaningful comparison.

Karst Geology and Groundwater – Inadequate Differentiation

The MCA assessment includes "karst geology and groundwater sensitivity" as an environmental criterion. However, the EIAR acknowledges that:

- All seven routes traverse karst limestone terrain;
- All routes were scored equally for groundwater sensitivity;
- No site-specific hydrogeological investigation was undertaken to differentiate between routes; and
- The assessment relied on desk-based review of geological mapping and GSI datasets.

This approach is fundamentally deficient. Within a karst limestone environment, local variations in geological structure, groundwater flow pathways, karstification intensity, and connectivity to surface water systems can give rise to materially different environmental risks between alternative routes.

The failure to undertake route-specific hydrogeological investigation means that:

- The MCA cannot reliably differentiate between routes on groundwater risk grounds;
- Routes with potentially higher risk of groundwater contamination may not have been identified;

- The selected route has not been demonstrated to represent the option with least hydrogeological risk;
- Opportunities to avoid high-risk areas through alternative routing have not been properly explored.

This represents a significant deficiency in the alternatives assessment and fails to comply with the requirements of the EIA Directive for robust comparison of environmental effects.

Residential and Community Sensitivity

The selected route (Route 4) traverses approximately 8 km of narrow rural roads serving established residential communities. The EIAR acknowledges that:

- Multiple residential properties are located in close proximity to the cable route;
- The route serves active school traffic and commuter movements;
- Full and partial road closures will be required during construction; and
- Prolonged disruption to residential access and community connectivity is anticipated.

Notwithstanding these acknowledged impacts, the MCA does not demonstrate that alternative routes with lower residential and community sensitivity were properly considered. In particular:

- No quantified assessment of the number of residential receptors affected by each route option;
- No evaluation of differential impacts on community severance and access;
- No consideration of routes which might utilise wider roads with lower residential density; and
- No assessment of cumulative impacts arising from concurrent infrastructure works on shared road corridors.

The absence of this comparative assessment means that the Commission cannot be satisfied that the selected route represents the option with least impact on residential amenity and community infrastructure.

5.3.4 Technology Options – Overhead Line Discounted

The EIAR states that overhead line (OHL) technology was considered but discounted in favour of underground cabling on landscape and visual grounds. The applicant states: "Overhead line infrastructure was discounted due to unacceptable landscape and visual impacts arising from the installation of electrical poles and conductors within the rural landscape." However, the EIAR does not provide:

- Quantified visual impact assessment of OHL technology;
- Photomontages or visualisations demonstrating the scale of visual effects;
- Comparative assessment of environmental trade-offs between underground and overhead options; and
- Assessment of whether mitigation measures (e.g. alternative pole designs, routeing through less sensitive areas) could reduce OHL impacts to acceptable levels.

The decision to discount OHL technology appears to have been taken at an early stage without proper comparative environmental assessment. This is inconsistent with the requirements of the EIA Directive for robust evaluation of technology alternatives.

Furthermore, the impacts associated with underground cabling—including extensive trenching, road disruption, groundwater risks, and community impacts—have not been properly weighed against the landscape impacts of OHL technology. The absence of this comparative assessment means that the Commission cannot be satisfied that underground cabling represents the most appropriate technology option from an integrated environmental perspective.

5.3.5 Cumulative Infrastructure and Corridor Constraints

A critical deficiency in the route selection assessment is the failure to properly account for cumulative infrastructure occupation of the proposed cable corridor. The selected route (Route 4) shares a significant length of road corridor with the proposed Gannow Wind Farm grid connection (separate planning application).

The implications of this shared corridor occupation include:

- Two separate cable systems will be installed in the same narrow rural roads;
- Prolonged and potentially overlapping construction programmes affecting the same communities;
- Cumulative disruption to residential access, agricultural operations, and community connectivity;
- Long-term constraints on future road maintenance, utility installations, and infrastructure upgrades; and
- Cumulative environmental effects which have not been properly assessed in either EIAR.

The failure to properly assess these cumulative corridor constraints within the route selection process represents a fundamental deficiency in the alternatives assessment. Alternative routes which would avoid shared corridor occupation were not identified or properly evaluated.

This cumulative infrastructure burden is addressed in detail in Section 5.0 of this objection.

5.3.6 Conclusion - Alternatives Assessment

The Concern Group respectfully submits that the alternatives assessment presented in the EIAR is fundamentally deficient and fails to comply with the requirements of the EIA Directive. In particular:

- The site selection process was infrastructure-led rather than environmentally led;
- No comparative environmental assessment of substation location alternatives was undertaken;
- The cable route MCA concluded that all options were "broadly comparable", indicating insufficient environmental differentiation;
- Karst geology and groundwater sensitivity were not properly investigated or differentiated between route options;
- Residential and community impacts were inadequately assessed in the route comparison;
- OHL technology was discounted without proper comparative environmental assessment; and
- Cumulative infrastructure and shared corridor constraints were not properly accounted for in route selection.

These deficiencies mean that An Coimisiún Pleanála cannot be satisfied that the proposed development represents the option with least environmental impact or that proper alternatives assessment has been undertaken in accordance with the EIA Directive.

Permission for the proposed development should be refused on this ground.

5.4 Ground 4: Traffic, Construction, and Road Infrastructure

5.4.1 Introduction

The proposed grid connection requires extensive trenching and road-opening works along approximately 8 km of narrow rural roads serving residential, agricultural, school, and commuter traffic. The scale and duration of construction works will give rise to significant impacts on traffic flow, road safety, residential access, and community connectivity.

The Concern Group has identified fundamental deficiencies in the traffic and transport assessment presented in the EIAR, including:

- Inadequate baseline traffic survey methodology;
- Failure to properly assess the scale and duration of road closures and traffic disruption;
- Insufficient evaluation of cumulative traffic impacts arising from concurrent infrastructure works;
- Inadequate assessment of impacts on residential access, emergency services, and community connectivity; and
- Unresolved concerns regarding pavement integrity, road reinstatement, and long-term infrastructure constraints.

These deficiencies are addressed in detail in the following subsections.

5.4.2 The Receiving Road Network

The proposed cable route traverses the following roads:

- L-7108: Constrained rural road serving agricultural and residential traffic;
- L-7109: Narrow road serving school traffic and local residential access; and
- Regional and local roads connecting to the M18 motorway.

These roads are characterised by:

- Substandard width (typically 3.5-4.5m carriageway);
- Limited forward visibility and constrained horizontal alignment;
- Absence of footpaths or pedestrian facilities;
- Stone walls, hedgerows, and roadside boundaries in close proximity to carriageway;
- Established residential access points and agricultural entrances;
- School-related traffic movements during peak periods; and

- Use by agricultural vehicles, commercial traffic, commuter traffic, and local residents.

The receiving road network is sensitive to prolonged construction disruption and has limited capacity to accommodate significant construction traffic, road closures, or temporary traffic management arrangements without giving rise to material impacts on road safety and community connectivity.

5.4.3 Scale and Duration of Proposed Works

The proposed cable installation will require:

- Trenching to depths of 1.2-1.5m along approximately 8 km of rural roads;
- Excavation, cable laying, backfilling, and pavement reinstatement over extended linear works;
- Full road closures for sections where trenching cannot be undertaken under traffic management;
- Partial road closures with temporary traffic lights or stop-go systems;
- Diversion of traffic onto alternative rural roads during closure periods;
- Construction traffic movements associated with materials delivery, spoil removal, and workforce transport;
- Concrete batching and placement for cable ducting and joint bays; and
- Testing, commissioning, and reinstatement works following cable installation.

The EIAR states that construction works will extend over a period of approximately 18-24 months. However, the EIAR does not provide:

- A consolidated closure programme showing which road sections will be closed at which times;
- An assessment of the cumulative duration of disruption affecting individual residential properties;
- Evaluation of the feasibility of maintaining emergency access during closure periods; and
- Assessment of impacts on school traffic, agricultural operations, and business access.

The absence of this information means that the Commission cannot properly assess the scale and acceptability of traffic and community impacts arising from the proposed works.

5.4.4 Baseline Traffic Assessment – Fundamental Deficiencies

Limited Survey Scope

The EIAR traffic baseline is based on traffic surveys undertaken on the L3103 local road only. The local roads which form the majority of the cable route. Other possible routes were not surveyed.

This represents a fundamental deficiency in the traffic assessment methodology. Without baseline traffic data for the roads which will be most significantly affected by the proposed works, the EIAR cannot:

- Properly characterise existing traffic flows and patterns;
- Assess the capacity of these roads to accommodate construction traffic;
- Evaluate the significance of traffic diversions and road closures; and
- Predict traffic impacts on residential receptors along these routes.

The failure to survey the roads most affected by the proposed development undermines the reliability of the entire traffic impact assessment.

5.4.5 Single-Day Winter Survey

The traffic survey was undertaken on a single day in January 2026. The EIAR does not provide:

- Assessment of seasonal traffic variations;
- Evaluation of school term versus holiday period traffic patterns;
- Consideration of agricultural traffic peaks associated with silage-making, harvest, and livestock movements; and
- Assessment of summer tourism-related traffic.

A single-day winter survey does not provide a representative baseline for roads serving agricultural, residential, and recreational traffic with significant seasonal variation. The use of winter baseline data is likely to underestimate traffic flows during the summer construction period and therefore underestimate the significance of construction-related traffic impacts.

5.4.6 Comparison with Gannow Wind Farm Assessment

The Concern Group notes that the traffic assessment undertaken for the Gannow Wind Farm grid connection—which proposes a substantially smaller cable installation on the same roads—adopted a materially more rigorous baseline survey methodology:

- Multiple survey locations along the cable route;
- Seven-day continuous automatic traffic counting;
- Assessment of daily and weekly traffic variations; and
- Classification of vehicle types and movements.

The present EIAR provides no explanation for why a larger and more disruptive cable installation has been assessed to a lower standard of traffic baseline survey than a smaller project on the same roads. This discrepancy raises serious concerns regarding the adequacy and reliability of the traffic impact assessment.

5.4.7 Traffic Management and Road Closures

The EIAR proposes a combination of full road closures and temporary traffic management (traffic lights, stop-go systems) along the cable route. However, critical aspects of the traffic management strategy remain unresolved:

Absence of Consolidated Closure Programme

The EIAR does not provide a consolidated closure programme showing:

- Which road sections will be closed at which times;
- The duration of closures affecting specific residential properties;
- Sequencing of works to minimise cumulative disruption; and
- Coordination with other infrastructure works (Gannow grid connection, local authority road works, utility installations).

This information has never been presented to the local community or to An Coimisiún Pleanála in consolidated form. The absence of a detailed closure programme means that:

- Residents cannot assess the likely duration and frequency of access disruption;
- The Commission cannot evaluate the acceptability of proposed traffic management arrangements;
- Emergency services cannot plan for alternative access provision; and
- Cumulative impacts on individual properties cannot be properly assessed.

Diversion Routes – Mutually Dependent and Incapacitated

The proposed diversion routes for road closures rely on alternative narrow rural roads which are themselves part of the cable route or subject to concurrent infrastructure works. This creates the following concerns:

- Diversion Route A cannot be used if works are ongoing on Diversion Route B, and vice versa;
- Simultaneous closures on multiple sections of the cable route have not been addressed;
- The capacity of diversion routes to accommodate increased traffic volumes has not been demonstrated;
- Impacts on residential properties located on diversion routes have not been assessed; and
- Pavement condition and structural capacity of diversion routes have not been verified.

The reliance on mutually dependent diversion routes which have not been properly assessed raises serious concerns regarding the feasibility and acceptability of the proposed traffic management strategy.

Emergency Access and Services

The EIAR does not adequately address emergency access requirements during construction. Critical deficiencies include:

- No assessment of emergency service response times during road closures;
- No evaluation of alternative access routes for ambulance, fire, and Garda services;
- No consultation with emergency services regarding the acceptability of proposed traffic management;
- No contingency arrangements for emergency access during simultaneous closures on multiple routes; and
- No assessment of access requirements for elderly or vulnerable residents requiring regular healthcare visits.

The absence of this assessment means that the Commission cannot be satisfied that emergency access can be maintained to an acceptable standard during the construction period.

5.4.8 Pavement Condition, Road Integrity, and Reinstatement

The EIAR provides limited assessment of existing pavement condition, structural capacity, or reinstatement methodology for roads affected by the cable installation works.

Pre-Works Condition Survey

The EIAR does not include a pre-works condition survey of the road network. The absence of this baseline information creates the following concerns:

- Existing pavement defects, cracks, and structural weaknesses have not been recorded;
- There is no baseline against which to assess construction-related damage; and
- Disputes regarding responsibility for post-construction pavement failures cannot be objectively resolved;
- The extent of reinstatement works required cannot be properly scoped or costed.

Standard industry practice for linear infrastructure works requires a detailed pre-works condition survey, including photographic and video recording of pavement condition, drainage infrastructure, roadside boundaries, and adjacent properties. The absence of this survey from the EIAR represents a significant deficiency in the construction methodology assessment.

Reinstatement Standards and Long-Term Performance

The EIAR states that road reinstatement will be undertaken in accordance with local authority standards and specifications. However, the EIAR does not provide:

- Details of proposed pavement construction and materials;
- Structural design calculations demonstrating adequate load-bearing capacity;
- Assessment of differential settlement risk between reinstated and existing pavement;
- Long-term monitoring and maintenance arrangements; and
- Financial bonding or guarantee arrangements for reinstatement works.

The Concern Group notes that cable trenching and reinstatement works frequently give rise to long-term pavement performance issues, including:

- Differential settlement between reinstated trench and adjacent original pavement;
- Longitudinal cracking along trench edges;
- Water ingress and pavement deterioration;
- Reduced structural capacity and accelerated maintenance requirements; and
- Ongoing community impacts arising from pavement failures and repeated repair works.

The absence of detailed reinstatement methodology and long-term performance guarantees means that the Commission cannot be satisfied that the proposed works will not give rise to ongoing pavement integrity issues and community impacts.

5.5 Ground 5: Infrastructure Interaction Concerns

5.5.1 **Castlelambert Overbridge – Unresolved Structural Concerns**

The proposed cable route crosses beneath the Castlelambert Overbridge, which carries the M18 motorway over the local road network. The EIAR acknowledges that cable installation in this location raises structural engineering concerns, including:

- Limited clearance beneath the bridge structure;
- Proximity of cable trench to bridge foundations;
- Potential for ground movement during excavation to affect bridge stability;
- Requirements for temporary support of the bridge structure during works; and
- Coordination with Transport Infrastructure Ireland (TII) and structural engineering oversight.

The EIAR states that detailed design and methodology for works at this location will be developed in consultation with TII. However, the absence of this detailed design information from the EIAR means that:

- The feasibility of cable installation at this location has not been demonstrated;
- The Commission cannot assess the adequacy of proposed construction methodology;

- Risks to the structural integrity of motorway infrastructure have not been properly evaluated; and
- Alternative routing options to avoid this constraint have not been properly assessed.

The deferral of critical design matters to post-consent stages is inconsistent with the requirements of the EIA Directive for assessment of all significant environmental effects prior to consent. If the works at Castletambert Overbridge prove to be infeasible or require materially different methodology, this could necessitate alternative routing with consequent environmental effects which have not been assessed in the EIAR.

Gas Transmission Pipeline Interaction

The proposed cable route crosses the high-pressure gas transmission pipeline which supplies natural gas to the peaker plant site. The EIAR acknowledges that this interaction raises safety concerns, including:

- Risk of pipeline damage during excavation and rock-breaking works;
- Requirements for hand-digging and exposure of the pipeline;
- Standoff distances and clearance requirements;
- Gas Networks Ireland (GNI) supervision and safety protocols; and
- Potential for construction delays and programme constraints.

The EIAR does not provide detailed methodology for works in proximity to the gas pipeline or demonstrate that safe working procedures can be implemented without unacceptable risk. In particular:

- No assessment of the risk of pipeline rupture or gas release during rock-breaking works;
- No evaluation of safety implications for construction workers and nearby residents;
- No assessment of the potential for pipeline damage to delay or prevent cable installation; and
- No consideration of alternative routing to avoid this high-risk interaction.

The interaction between cable installation works and a live high-pressure gas transmission main represents a significant safety concern which has not been adequately addressed in the EIAR. The Commission cannot be satisfied that the proposed works can be undertaken without unacceptable risk to public safety and critical infrastructure.

5.5.2 Conclusion - Traffic and Construction Impacts

Our client respectfully submits that the traffic and transport assessment presented in the EIAR is fundamentally deficient and fails to provide a reliable basis for assessment of construction-related impacts. In particular:

- The baseline traffic survey is limited in scope, duration, and geographic coverage;
- The scale and duration of road closures and traffic disruption have not been properly assessed;
- No consolidated closure programme has been presented to demonstrate the feasibility and acceptability of traffic management arrangements;
- Diversion routes are mutually dependent and have not been demonstrated to have adequate capacity;
- Emergency access requirements have not been adequately addressed;
- Pavement condition, reinstatement methodology, and long-term performance have not been properly assessed;
- Critical infrastructure interactions (Castletambert Overbridge, gas pipeline) remain unresolved; and
- Cumulative traffic impacts arising from concurrent infrastructure works have not been properly assessed.

These deficiencies mean that An Coimisiún Pleanála cannot be satisfied that the proposed development can be undertaken without giving rise to significant adverse effects on traffic flow, road safety, residential access, and community connectivity.

Permission for the proposed development should be refused on this ground.

5.6 Ground 6: Cumulative Infrastructure Impact – Gannow Wind Farm Grid Connection

5.6.1 Introduction

A critical deficiency in the environmental assessment presented in the EIAR is the failure to adequately assess cumulative impacts arising from the proposed installation of two separate underground cable systems within the same constrained rural road corridor.

The proposed Cashla Peaker grid connection (ACP Ref: 324162) shares a significant length of road corridor with the proposed Gannow Wind Farm grid connection (separate planning application). Both projects

propose underground 220kV cabling along narrow rural roads serving the same residential communities, agricultural holdings, and local infrastructure.

The simultaneous or sequential installation of two major cable systems within the same road corridor will give rise to significant cumulative impacts on traffic flow, residential amenity, construction disruption, pavement integrity, and long-term infrastructure constraints. These cumulative impacts have not been adequately assessed in either EIAR, resulting in a fundamental deficiency in the environmental assessment process.

5.6.2 Extent of Shared Corridor Occupation

The two cable systems share approximately 4-5 km of common road corridor, including:

- The road from the junction with the R348 to Castlelambert;
- Sections of the L-7108 serving residential properties and agricultural holdings;
- Local road connections to the M18 motorway corridor; and
- Access roads serving multiple residential receptors.

This shared corridor occupation means that the same roads, the same residential properties, and the same local communities will be affected by two prolonged periods of construction disruption, traffic management, and infrastructure works.

Physical Infrastructure Constraints

The installation of two separate 220kV cable systems within narrow rural roads (typically 3.5-4.5m carriageway width) raises fundamental questions regarding:

- Physical accommodation of two cable trenches within constrained road reserve;
- Separation distances between cable systems;
- Interaction with existing underground utilities (water mains, telecommunications, drainage);
- Long-term constraints on future road maintenance, widening, or utility installations; and
- Structural capacity of reinstated pavement to accommodate overlapping trench lines.

The EIAR for the present development does not demonstrate that the road corridor has adequate capacity to accommodate both cable systems without unacceptable constraints on future infrastructure provision and/or road maintenance operations.

Applicant's Acknowledgement of Cumulative Concern

Significantly, the applicant's own EIAR acknowledges the potential for cumulative impacts arising from the Gannow Wind Farm grid connection. The EIAR states: "The potential for cumulative construction impacts arising from concurrent or sequential cable installation works is acknowledged. Coordination with other infrastructure providers will be required to minimise cumulative disruption to the local community."

This acknowledgement confirms that:

- The applicant is aware of the Gannow Wind Farm grid connection proposal;
- The applicant recognises the potential for cumulative construction impacts;
- Coordination between projects is required to manage cumulative effects; and
- The potential for cumulative disruption to the community is acknowledged.

Notwithstanding this acknowledgement, the EIAR does not provide quantified assessment of cumulative impacts, does not demonstrate that cumulative effects can be adequately mitigated, and does not provide a coordination framework for managing concurrent or sequential works. The acknowledgement of cumulative concern without robust assessment represents a fundamental deficiency in the environmental impact assessment process.

5.6.3 Cumulative Construction Impacts

Overlapping Construction Programmes

The construction programme for the Cashla Peaker grid connection extends over approximately 18-24 months. The Gannow Wind Farm grid connection proposes a similar construction duration. The potential for overlapping construction programmes raises the following cumulative impact concerns:

- Prolonged disruption to residential access and community connectivity extending over multiple years;
- Cumulative traffic impacts on the same constrained rural roads;
- Overlapping road closures and traffic management arrangements;

- Cumulative noise, dust, and vibration impacts affecting the same residential receptors;
- Combined construction traffic movements on unsuitable rural roads; and
- Cumulative impacts on commercial traffic, school traffic, agricultural operations, and emergency access.

The EIAR does not assess these cumulative construction impacts or demonstrate that overlapping construction programmes can be managed without unacceptable effects on residential amenity and community infrastructure.

Sequential Works – Prolonged Disruption

Even if the two cable installations are sequenced rather than concurrent, the cumulative duration of construction disruption affecting individual residential properties could extend over 3-4 years or more. This raises fundamental questions regarding:

- The acceptability of prolonged construction disruption in a residential environment;
- Cumulative impacts on property values and residential amenity;
- The ability of local businesses and agricultural holdings to operate effectively during extended construction periods;
- Cumulative effects on community cohesion and quality of life; and
- The proportionality of infrastructure burden relative to the limited local benefit from the developments.

The EIAR does not assess the cumulative duration of construction impacts or demonstrate that sequential construction programmes represent an acceptable approach to infrastructure provision in this sensitive residential environment.

Pavement Reinstatement and Long-Term Integrity

The installation of two separate cable trenches within the same narrow rural roads raises serious concerns regarding long-term pavement integrity. Key concerns include:

- Repeated excavation and reinstatement of the same road sections;
- Differential settlement between multiple trench lines and original pavement;
- Reduced structural capacity of extensively reinstated pavement;
- Accelerated deterioration and maintenance requirements;
- Ongoing community impacts arising from pavement failures and repeated repair works; and
- Financial burden on the local authority for long-term road maintenance.

The EIAR does not address these long-term cumulative impacts on pavement integrity or demonstrate that the road network can accommodate two major cable installations without unacceptable long-term maintenance implications.

5.6.4 Comparison of EIAR Methodologies

A significant concern identified by the Concern Group is the disparity in EIAR methodology between the present application and the Gannow Wind Farm grid connection. Specifically:

Traffic Assessment Standards

The Gannow Wind Farm grid connection EIAR adopted a materially more rigorous traffic baseline survey methodology than the present application:

Assessment Criterion	Gannow (Smaller Cable)	Cashla (Larger Cable)
Survey locations	Multiple locations along route	Mostly L3103
Survey duration	7-day continuous counting	Limited
Local roads surveyed	Yes – L7106, L7108, L7109	Limited
Vehicle classification	Detailed breakdown	Limited

Table 1: Comparison of the current scheme with the Cashla scheme

This comparison demonstrates that a substantially larger and more disruptive cable installation (the present development) has been assessed to a materially lower standard than a smaller project on the same roads. The present EIAR provides no justification for this disparity in assessment methodology.

5.6.5 Cumulative Landscape and Visual Impacts

The proposed Cashla Peaker grid connection includes a substantial 220kV substation compound with associated telecommunications mast, security fencing, and lighting infrastructure. The Gannow Wind Farm grid connection also proposes electrical infrastructure within the same rural landscape.

The cumulative landscape and visual impacts arising from multiple electrical installations within this rural environment have not been adequately assessed. Key concerns include:

- Progressive industrialisation of the rural landscape;
- Cumulative visual effects of multiple substations, masts, and electrical infrastructure;
- Combined lighting impacts during construction and operation;
- Erosion of rural landscape character and sense of place; and
- Cumulative impacts on the setting of Athenry heritage town.

The EIAR does not provide cumulative viewpoint analysis, photomontages, or visual impact assessment incorporating both developments. The Commission cannot therefore properly assess the cumulative landscape and visual effects of the proposed infrastructure.

5.6.6 Conclusion - Cumulative Impacts

The Concern Group respectfully submits that the cumulative impacts arising from two major underground cable installations within the same constrained rural road corridor represent a fundamental concern which has not been adequately addressed in the EIAR.

The inadequacy of cumulative assessment includes:

- Failure to quantify the cumulative duration of construction disruption affecting individual properties;
- Inadequate assessment of overlapping or sequential construction programmes;
- Failure to demonstrate that the road corridor has adequate capacity for two cable systems;
- Inadequate assessment of long-term pavement integrity implications;
- Disparity in EIAR methodologies between related projects on the same roads; and
- Inadequate assessment of cumulative landscape and visual effects.

The Commission cannot be satisfied that cumulative impacts have been properly assessed or that cumulative effects can be adequately mitigated. Permission should be refused on this ground.

5.7 Ground 7: Hydrogeology, Groundwater, and Water Environment

5.7.1 Introduction

The proposed development is located within a highly vulnerable karst limestone environment characterised by rapid groundwater flow pathways, extensive karstification, and documented hydrological connectivity to sensitive surface water and groundwater receptors.

The installation of approximately 8 km of underground cabling requiring trenching to depths of 1.2-1.5m, together with excavation for joint bays, cable ducts, and substation foundations, will give rise to significant risks to groundwater quality and quantity. These risks have not been adequately assessed in the EIAR.

5.7.2 Geological and Hydrogeological Setting

Karst Limestone Geology

The proposed cable route traverses the Burren Formation limestone, a highly karstified bedrock unit characterised by:

- Extensive dissolution features including caves, swallow holes, and conduit systems;
- Rapid groundwater flow through fractures, fissures, and solution channels;
- Limited overburden thickness with bedrock at or near ground surface in many locations;
- High permeability and transmissivity; and
- Direct hydraulic connection between surface water and groundwater systems.

The Geological Survey of Ireland (GSI) classifies the groundwater vulnerability in this area as "Extreme" to "High", indicating:

- Minimal natural attenuation capacity;
- Rapid vertical infiltration of surface contaminants;
- Potential for rapid and extensive groundwater contamination; and

- High sensitivity to construction-related impacts.

Groundwater Receptors and European Sites

The groundwater system underlying the proposed cable route is hydrologically connected to:

- Lough Corrib SAC (Site Code 000297) – located approximately 12 km northwest;
- Galway Bay Complex SAC (Site Code 000268) – located approximately 15 km west;
- Private groundwater wells and springs serving residential properties;
- Agricultural water supplies and livestock watering systems; and
- Surface water features including streams, drains, and wetland areas.

The GSI Groundwater Body status for this area is classified as "Good". The Water Framework Directive requires that this status is protected and that no deterioration in water quality occurs as a result of new developments.

The hydrological connectivity between the development site and European sites means that any contamination of groundwater during construction or operation has the potential to affect qualifying interests and conservation objectives of these protected sites.

5.7.3 Construction-Related Groundwater Risks

Excavation and Dewatering

The proposed trenching works will involve excavation to depths of 1.2-1.5m along approximately 8 km of cable route. In karst limestone terrain, excavation activities give rise to the following groundwater risks:

- Interception of groundwater flow pathways and fracture systems;
- Dewatering requirements where groundwater is encountered in excavations;
- Discharge of turbid water containing suspended sediment to ground or surface water;
- Potential for creating new hydraulic connections between previously isolated flow systems;
- Risk of sinkhole development or ground subsidence in areas of shallow karst features.

The EIAR does not provide:

- Site-specific hydrogeological investigation to identify groundwater levels along the cable route;
- Assessment of likely dewatering requirements and volumes;
- Evaluation of discharge options and receiving water capacity;
- Water quality monitoring proposals for construction-phase discharges; and
- Contingency procedures for encountering unexpected groundwater inflows or karst features.

The absence of this assessment means that the Commission cannot be satisfied that construction-related groundwater impacts can be adequately managed or mitigated.

Concrete Placement and Cement-Based Materials

The cable installation requires substantial concrete placement for:

- Cable duct bedding and surround;
- Joint bay construction;
- Cable chamber and manhole structures; and
- Substation foundations and hardstanding areas.

In karst limestone environments, the placement of cement-based materials gives rise to significant contamination risks:

- Highly alkaline pH of fresh concrete (pH 12-13) is toxic to aquatic organisms;
- Cement-contaminated water can cause rapid and severe impacts on surface water and groundwater quality;
- Concrete washout and spillage can result in long-lasting contamination of karst conduits;
- Rapid infiltration through fractures can result in contamination of deep groundwater systems; and
- Contamination events in karst terrain can affect extensive areas due to rapid groundwater flow velocities.

The EIAR does not demonstrate that concrete placement can be undertaken without unacceptable risk of groundwater contamination. In particular:

- No assessment of protocols for concrete batching, placement, and curing in groundwater-sensitive areas;
- No evaluation of washout and spillage containment measures;
- No groundwater quality monitoring proposals during concrete placement; and
- No contingency procedures for responding to cement contamination incidents.

Fuel, Oil, and Chemical Storage

Construction activities will involve on-site storage and use of:

- Diesel fuel for plant and machinery;
- Hydraulic oils and lubricants;
- Chemical additives for concrete; and
- Cleaning solvents and maintenance products.

In a karst limestone environment with extreme groundwater vulnerability, any spillage or leakage of these substances represents a significant contamination risk. The rapid infiltration pathways and limited natural attenuation capacity mean that even small spills can result in extensive groundwater contamination.

The EIAR does not provide adequate assessment of fuel and chemical storage protocols, spill containment measures, or emergency response procedures appropriate to the highly vulnerable hydrogeological setting.

5.7.4 Inadequacy of Hydrogeological Investigation

A fundamental deficiency in the EIAR is the limited extent of site-specific hydrogeological investigation undertaken to characterise groundwater conditions along the cable route.

Reliance on Desk-Based Assessment

The hydrogeological assessment presented in the EIAR relies primarily on:

- Review of GSI datasets and published geological mapping;
- Consultation of EPA water quality data;
- Desk-based review of karst features database; and
- Walkover survey of the cable route.

No intrusive site investigation works were undertaken. In particular:

- No trial pits or boreholes to establish groundwater levels along the route;
- No groundwater sampling or water quality analysis;
- No aquifer testing to determine hydraulic properties;
- No dye-tracing studies to establish groundwater flow pathways and connectivity; and
- No geophysical survey to identify subsurface karst features or voids.

The reliance on desk-based assessment is inadequate for a development of this scale in a highly vulnerable karst environment. Site-specific investigation is required to:

- Identify locations where groundwater will be encountered during excavation;
- Determine groundwater flow directions and velocities;
- Establish connectivity to sensitive receptors and European sites;
- Identify locations of high karstification or subsurface voids; and
- Provide a reliable basis for design of groundwater protection measures.

The absence of site-specific hydrogeological investigation means that the EIAR cannot reliably predict or assess groundwater impacts.

5.7.5 Water Framework Directive Compliance

The Water Framework Directive (Directive 2000/60/EC) requires that:

- All water bodies achieve "Good Status" by specified deadlines;
- No deterioration in water body status occurs as a result of new developments; and
- Appropriate measures are taken to protect water quality and prevent pollution.

The proposed development has the potential to affect:

- Corrib Groundwater Body (Status: Good) – risk of deterioration through construction-related contamination;
- Dunkellin River Surface Water Body (Status: Moderate) – risk of further deterioration through sediment-laden runoff; and
- Galway Bay Transitional Water Body – risk of contamination via groundwater pathways.

The EIAR does not demonstrate that the proposed development can be undertaken without risk of water quality deterioration or that adequate protection measures will be implemented to ensure Water Framework Directive compliance.

In the absence of robust groundwater impact assessment and mitigation, the Commission cannot be satisfied that the development is consistent with the objectives of the Water Framework Directive.

5.7.6 Conclusion - Hydrogeology and Groundwater

The Concern Group respectfully submits that the hydrogeological assessment presented in the EIAR is fundamentally deficient and fails to provide a reliable basis for assessment of groundwater impacts. In particular:

- The development is located in a highly vulnerable karst limestone environment;
- The groundwater system is hydrologically connected to European sites and private water supplies;
- Extensive trenching and excavation works will give rise to significant groundwater risks;
- No site-specific hydrogeological investigation has been undertaken;
- Construction-related contamination risks have not been adequately assessed; and
- Compliance with Water Framework Directive requirements has not been demonstrated.

The Commission cannot be satisfied that significant adverse effects on groundwater quality and quantity can be avoided or adequately mitigated. Permission should be refused on this ground.

5.8 Ground 8: Landscape, Visual Impact, and Rural Character

5.8.1 Introduction

The proposed development comprises substantial electrical infrastructure including a 220kV substation compound, telecommunications mast exceeding 20m in height, security fencing, lighting columns, access tracks, and associated electrical equipment within an open rural landscape of high sensitivity to industrial development.

The Concern Group has identified significant deficiencies in the Landscape and Visual Impact Assessment (LVIA) presented in the EIAR, including inadequate study area definition, insufficient viewpoint analysis, unresolved cumulative landscape effects, and failure to properly assess the long-term visual impact of permanent industrial infrastructure in a sensitive rural setting.

5.8.2 Landscape Character Assessment

Receiving Landscape Context

The proposed substation is located within Landscape Character Area 12: Central Galway Complex, as defined in the Galway County Development Plan 2022-2028. This landscape is characterised by:

- Mixed agricultural land use with pastoral and tillage farming;
- Dispersed rural settlement pattern with traditional farmsteads and ribbon development;
- Field pattern defined by stone walls and mature hedgerows;
- Open, gently undulating topography with long-distance views;
- Rural character with limited industrial or commercial development; and
- High sensitivity to large-scale built development and industrial infrastructure.

The Development Plan classifies this landscape as having High landscape sensitivity and states that development should "respect the existing character and pattern of development" and "avoid undue visual intrusion".

The proposed substation compound, telecommunications mast, and associated infrastructure represent a substantial departure from the prevailing rural character and introduce large-scale industrial development into a landscape with limited capacity to absorb such infrastructure without significant adverse effects.

Substation Compound – Scale and Prominence

The proposed substation compound comprises:

- Electrical switching equipment and transformers up to 6-7m in height;
- Telecommunications mast exceeding 20m above ground level;
- 2.4m high palisade security fencing surrounding the entire compound;
- Lighting columns for security and operational purposes;
- Access tracks with stone aggregate surfacing;
- Hardstanding areas and equipment platforms; and
- Control buildings and ancillary structures.

The compound will occupy approximately 0.8 hectares of open agricultural land. The EIAR acknowledges that the substation will be "visible from surrounding roads and residential properties" but concludes that visual effects will be "moderate" following mitigation.

The Concern Group submits that this conclusion significantly underestimates the scale and prominence of the proposed infrastructure. In particular:

- A 20m+ telecommunications mast will be highly prominent in the flat to gently undulating landscape;
- The 2.4m security fencing will create a hard industrial boundary at odds with the rural field pattern;
- Lighting columns will introduce light pollution in an area with dark night skies;
- The cumulative bulk and height of electrical equipment will be readily apparent from multiple viewpoints; and
- The industrial character of the development is fundamentally incompatible with the rural agricultural landscape.

5.8.3 Study Area and Viewpoint Assessment Deficiencies

Constrained Study Area

The LVIA adopts a study area of 3.5 km radius from the proposed substation. This represents a constrained assessment scope which fails to capture the full extent of potential visual effects.

Our client notes that Galway County Council, during pre-application consultation, specifically recommended: "A wider study area (5km) with particular focus within 2km of receptors was recommended to provide a clear understanding of the overall scale."

The applicant's decision to adopt a 3.5 km study area represents a clear departure from the recommendations of the Planning Authority and results in an incomplete assessment of visual effects. In particular:

- A 20m+ telecommunications mast will be visible from elevated viewpoints well beyond 3.5 km;
- Cumulative visual effects arising from multiple electrical installations require wider-area assessment;
- The relationship between the substation and the heritage town of Athenry (approximately 4 km distant) has not been properly assessed; and
- Potential visual effects from elevated viewpoints to the north and east have not been evaluated.

The use of a constrained study area undermines the reliability of the LVIA and is likely to result in underestimation of significant adverse visual effects.

Limited Viewpoint Selection

The EIAR presents photomontages from six viewpoints. However, the viewpoint selection does not adequately represent:

- Views from residential properties in close proximity to the substation;
- Views from elevated locations to the north and east;
- Views from local roads and walking routes; and
- Views from the opposite side of the M18 motorway (as specifically requested by Galway County Council);
- Sequential views experienced by road users along the cable route corridor.

The limited viewpoint selection means that the Commission cannot properly assess the extent and significance of visual impacts on residential receptors, road users, and recreational users of the landscape.

Photomontage Methodology Concerns

The photomontages presented in the EIAR were prepared during winter months when deciduous hedgerows and trees are not in full leaf. This seasonal baseline has the effect of:

- Overestimating the screening effect of vegetation during the leafless winter period;
 - Presenting a "best case" visual scenario which does not represent year-round visibility; and
 - Underestimating visual prominence during summer months when foliage provides greater screening.
- A robust LVIA should present photomontages representing both winter (maximum visibility) and summer (vegetated) scenarios to enable proper assessment of seasonal variation in visual effects. The reliance on winter photography only undermines the reliability of the visual impact assessment.

5.8.4 Mitigation Measures – Inadequate and Unenforceable

The EIAR proposes landscape planting and hedgerow enhancement as mitigation for visual impacts. However, the proposed mitigation strategy is fundamentally inadequate:

Screening Planting Effectiveness

The following problems arise:

- Native hedgerow planting will require 10-15 years to reach effective screening height;
- During this establishment period, the substation will be fully visible;
- Deciduous planting provides limited screening during winter months;
- A 20m telecommunications mast cannot be screened by hedgerow planting; and
- Security fencing and lighting will remain visible above vegetation.

The reliance on landscape planting as primary mitigation fails to address the immediate and long-term visual prominence of industrial infrastructure in a sensitive rural setting.

Absence of Lighting Assessment

The EIAR acknowledges that security lighting will be installed at the substation but provides no detailed assessment of lighting impacts. Critical deficiencies include:

- No lighting design drawings showing luminaire locations, heights, or specifications;
- No assessment of light spill onto surrounding residential properties;
- No evaluation of sky glow or light pollution in an area with dark night skies;
- No consideration of lighting impacts on nocturnal wildlife; and
- No assessment of cumulative lighting effects with the peaker plant and other infrastructure.

The absence of detailed lighting assessment means that the Commission cannot properly evaluate night-time visual impacts or ensure that residential amenity will be protected.

5.8.5 Cumulative Landscape Impacts

The proposed substation must be assessed cumulatively with:

- The Cashla Peaker Plant (ACP Ref: 324113) – large-scale industrial development 3.4 km to the west;
- The existing Cashla 220kV substation – located adjacent to the proposed development;
- The Gannow Wind Farm grid connection infrastructure;
- M18 and M6 motorway corridors;
- Existing telecommunications masts and electrical infrastructure.
- The cumulative effect of multiple industrial installations within this rural landscape gives rise to progressive industrialisation and erosion of rural character. The EIAR does not provide:
- Cumulative viewpoint analysis incorporating all developments;
- Assessment of the combined visual prominence of multiple electrical installations;
- Evaluation of the cumulative effect on landscape character and sense of place; and
- Assessment of the threshold at which cumulative development results in unacceptable landscape impacts.

The failure to properly assess cumulative landscape impacts represents a fundamental deficiency in the environmental assessment process.

5.8.6 Heritage Landscape Context

The proposed development is located within the rural hinterland of Athenry, a heritage town of national significance with a medieval core, town walls, castle, and priory. The Athenry Town Centre First Plan identifies: "Athenry is one of the best preserved medieval market towns in Ireland... The town is set within agricultural hinterland ...". The visual relationship between Athenry and its surrounding agricultural landscape contributes to the heritage value and setting of the town. The introduction of large-scale electrical infrastructure within this heritage landscape has the potential to:

- Alter the rural character of the historic hinterland;
- Introduce industrial development at odds with the medieval settlement pattern;
- Erode the visual relationship between the town and its agricultural setting; and
- Diminish the visitor experience and perception of heritage assets.

The EIAR does not adequately assess impacts on heritage landscape character or the setting of Athenry heritage town. This represents a significant omission in the landscape assessment.

5.8.7 Conclusion - Landscape and Visual Impact

The Concern Group respectfully submits that the LVIA presented in the EIAR is fundamentally deficient and fails to provide a reliable basis for assessment of landscape and visual impacts. In particular:

- The study area is constrained and departs from Planning Authority recommendations;
- Viewpoint selection is limited and fails to represent key residential and public receptors;
- Photomontages present winter-only scenarios which underestimate year-round visibility;
- Proposed mitigation is inadequate and cannot screen prominent infrastructure;
- Lighting impacts have not been properly assessed;
- Cumulative landscape effects have not been adequately evaluated; and
- Impacts on heritage landscape setting have not been properly addressed.

The Commission cannot be satisfied that significant adverse landscape and visual effects can be avoided or adequately mitigated. Permission should be refused on this ground.

5.9 Ground 9: Biodiversity, Ecology, and European Sites

5.9.1 Introduction

The proposed development has the potential to affect sensitive ecological receptors through direct habitat loss, hedgerow removal, disturbance to protected species, and indirect effects arising from groundwater pathways and hydrological connectivity to European sites.

Our client has identified significant deficiencies in the ecological impact assessment and Appropriate Assessment process, including inadequate survey methodology, unresolved connectivity pathways, and failure to properly assess cumulative effects on European sites.

5.9.2 Baseline Ecological Survey Deficiencies

Survey Timing and Scope

The ecological surveys undertaken to inform the EIAR were conducted during limited survey periods and do not provide a comprehensive baseline for assessment of ecological impacts. Critical deficiencies include:

- Bat activity surveys limited to summer months – no spring or autumn migration period assessment;
- Breeding bird surveys undertaken during sub-optimal weather conditions;
- No dedicated badger survey – reliance on incidental observations only;
- Limited otter survey coverage along watercourses; and
- No assessment of invertebrate populations or protected species.

The reliance on limited-scope surveys means that the presence and significance of protected species along the cable route may not have been properly identified. This creates the risk that construction works will result in unforeseen impacts on protected fauna.

Hedgerow Assessment

The proposed cable route requires removal or modification of hedgerows and field boundaries at multiple locations. The EIAR acknowledges that hedgerows provide:

- Habitat and foraging resources for bats, birds, and small mammals;
- Wildlife corridors enabling species movement through the agricultural landscape;
- Ecological connectivity between habitat patches; and
- Nesting and breeding habitat for protected bird species.

However, the EIAR does not provide:

- Detailed hedgerow survey using standard assessment methodologies;
- Classification of hedgerows according to ecological importance;

- Assessment of connectivity value for protected species;
 - Quantified calculation of hedgerow loss along the cable route; and
 - Demonstration that compensatory planting will provide equivalent ecological value.
- The absence of detailed hedgerow assessment means that the Commission cannot properly evaluate the significance of habitat loss or the adequacy of proposed mitigation.

5.9.3 European Sites and Appropriate Assessment

Screening Conclusion – Significant Effects Not Excluded

The Appropriate Assessment Screening Report concludes that significant effects on European sites cannot be excluded and that Natura Impact Statement (NIS) is required. The relevant European sites identified include:

- Lough Corrib SAC (Site Code 000297) – located approximately 12 km northwest;
 - Galway Bay Complex SAC (Site Code 000268) – located approximately 15 km west;
 - Lough Corrib SPA (Site Code 004042) – supporting populations of wintering waterfowl.
- The screening assessment identifies potential impact pathways including:
- Groundwater connectivity via karst limestone aquifer system;
 - Surface water connectivity via tributary streams and drainage networks;
 - Indirect effects arising from construction-phase contamination; and
 - Hydrological effects arising from excavation and dewatering.

The identification of these pathways and the conclusion that significant effects cannot be excluded confirms that the proposed development has the potential to affect European sites. The adequacy of the NIS in addressing these pathways is addressed below.

Natura Impact Statement – Pathway Assessment Deficiencies

The NIS concludes that the proposed development will not adversely affect the integrity of any European site, subject to implementation of mitigation measures. However, the Concern Group has identified fundamental deficiencies in the assessment of hydrological pathways:

- No site-specific hydrogeological investigation to establish groundwater flow directions and velocities;
- No dye-tracing studies to confirm connectivity between the site and European sites;
- No quantitative assessment of potential contaminant transport via groundwater pathways; and
- Reliance on generic mitigation measures without demonstration of effectiveness in karst environments;
- No assessment of cumulative effects arising from concurrent infrastructure works.

In karst limestone environments, groundwater pathways can be complex, rapid, and variable. The absence of site-specific investigation means that the NIS cannot reliably:

- Identify all potential pathways linking the site to European sites;
- Predict the transport time for contaminants to reach sensitive receptors;
- Demonstrate that proposed mitigation will be effective in preventing contamination; and
- Assess the significance of construction-phase risks to water quality.

The reliance on desk-based assessment and generic mitigation measures is inadequate for a development in a highly vulnerable hydrogeological setting with documented connectivity to European sites.

In-Combination Effects

Article 6(3) of the Habitats Directive requires assessment of in-combination effects with other plans or projects. The NIS identifies the following relevant projects:

- Cashla Peaker Plant (ACP Ref: 324113);
- Gannow Wind Farm grid connection;
- Existing Cashla 220kV substation; and
- Agricultural activities and existing land use.

However, the in-combination assessment is superficial and does not provide quantified evaluation of cumulative effects. In particular:

- No assessment of cumulative construction-phase discharges to groundwater;
- No evaluation of combined abstraction or dewatering effects;
- No assessment of cumulative nutrient or contaminant loading; and
- No consideration of sequential or overlapping construction programmes.

The inadequacy of in-combination assessment means that the Commission cannot be satisfied that cumulative effects on European sites have been properly evaluated.

5.9.4 Protected Species – Bat Populations

A bat activity survey of the main site has identified multiple bat species utilising hedgerows and field boundaries – this may also be the case along the cable route which has not been surveyed. The bat species are:

- Common pipistrelle (*Pipistrellus pipistrellus*);
- Soprano pipistrelle (*Pipistrellus pygmaeus*); and
- Leisler's bat (*Nyctalus leisleri*).

All bat species are legally protected under the Wildlife Acts and the EU Habitats Directive. The proposed development will result in:

- Temporary loss of foraging habitat during construction;
- Removal or modification of commuting routes along hedgerows;
- Disturbance from construction lighting and noise; and
- Permanent alteration of habitat structure.

A bat activity survey was carried out on the main site only, not along grid connection however grid connection would be close to site and along flight path and area for bats foraging, so should carry some points, however a detailed survey should be carried out along grid route

The Department of Housing, Local Government and Heritage states, with reference to bats (in its submission on application reg. ref. 324113, prepared by Julie Sullivan)

Bats

The survey comprises a preliminary walkover survey and a period of static detector monitoring over thirteen consecutive nights in June. While this provides information on summer activity, it does not constitute a comprehensive multi-season assessment. The absence of survey effort during spring and autumn periods introduces uncertainty regarding commuting, dispersal, and swarming behaviour.

The baseline identifies a number of bat species actively foraging within the site and along its boundaries, including species known to be sensitive to artificial lighting. The report also 4 identifies treeline habitat along the site boundary as supporting higher levels of activity and indicates potential roosting within tree features. However, no detailed roost assessment has been undertaken to confirm or exclude this potential.

The assessment is primarily confined to the development footprint and does not adequately consider the role of boundary habitats and linear features as commuting routes within the wider landscape. The potential ecological connectivity of the site has therefore not been fully evaluated.

Having regard to the Site Lighting Report, the Department notes that the proposed development includes extensive permanent lighting infrastructure, including luminaires mounted at heights of approximately 8 metres and 20 metres, with lighting levels designed to achieve average horizontal illuminance in the order of 10 lux, with higher localised values.

Artificial lighting is not assessed within the bat report, notwithstanding the scale of proposed lighting infrastructure. The absence of a bat-specific lighting impact assessment represents a significant deficiency, particularly given the known sensitivity of certain bat species to illumination. In the absence of such assessment, the potential for disruption of commuting routes and displacement from foraging habitat cannot be excluded.

Mitigation measures are limited in scope and lack specificity. There is no clear strategy for habitat retention, avoidance of key features, or mitigation of lighting impacts. On this basis, the assessment does not provide sufficient information to support a conclusion of no adverse effect on bat species.

The EIAR proposes pre-construction surveys and timing restrictions as mitigation. However:

- No adequate bat activity surveys were carried out along the cable route.
- No detailed lighting strategy to minimise disturbance to light-sensitive bat species;
- No assessment of whether hedgerow removal will sever important commuting routes;
- No demonstration that compensatory planting will provide equivalent habitat value within relevant timeframes; and
- No provision for ongoing monitoring of bat populations post-construction.

The adequacy of mitigation for protected bat populations has not been demonstrated.

5.9.5 Invasive Species Risk

The EIAR acknowledges the presence of Japanese knotweed (*Fallopia japonica*) at one location within the cable route corridor. This species is listed on the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations 2011, prohibiting introduction and spread.

The construction works, involving extensive soil excavation and movement, create significant risk of spreading Japanese knotweed and potentially other invasive species to new locations. The EIAR proposes:

- Pre-construction survey to identify invasive species locations;
- Implementation of biosecurity protocols;
- Segregation of contaminated soil;
- However, the EIAR does not provide:
- Detailed methodology for excavation and disposal of contaminated material;
- Specification of biosecurity measures for plant and equipment;
- Long-term monitoring and eradication programme; and
- Assessment of the risk of spreading invasive species along the 8 km cable corridor.

The absence of detailed invasive species management strategy creates unacceptable risk of environmental harm through spread of prohibited species.

5.9.6 Conclusion - Biodiversity and Ecology

The Concern Group respectfully submits that the ecological impact assessment and Appropriate Assessment process are fundamentally deficient. In particular:

- Baseline ecological surveys are limited in scope and timing;
- Hedgerow assessment does not quantify ecological value or connectivity;
- The NIS relies on desk-based assessment without site-specific hydrogeological investigation;
- Hydrological pathways to European sites have not been properly characterised;
- In-combination effects have not been adequately assessed;
- Mitigation for protected bat populations is inadequate; and
- Invasive species management strategy lacks necessary detail.

The Commission cannot be satisfied that the proposed development will not adversely affect the integrity of European sites or that significant effects on protected species can be avoided. Permission should be refused on this ground.

5.10 Ground 10: Cultural Heritage, Archaeology, and Historic Landscape

5.10.1 Introduction

The proposed development is located within the historic hinterland of Athenry, a heritage town of national significance with a medieval core designated as an Architectural Conservation Area. The cable route and substation site are located within a landscape which has been continuously occupied and farmed since medieval times.

The Concern Group submits that the archaeological and cultural heritage assessment presented in the EIAR adopts an overly narrow interpretation of heritage significance and fails to adequately assess impacts on historic landscape character, setting of heritage assets, and potential for subsurface archaeological remains.

5.10.2 Archaeological Baseline and Recorded Monuments

Recorded Monuments Within Study Area

The Record of Monuments and Places (RMP) identifies multiple recorded monuments within the vicinity of the proposed development, including:

- GA096-054 – Ringfort, located 100m west of the M18 motorway;
- GA096-055 – Enclosure, located 300m north of the cable route;
- GA096-056 – Holy well, located 400m east of the substation site; and
- Multiple additional ringforts, enclosures, and field systems within 1 km radius.

The density of recorded monuments in this area indicates that the landscape has high archaeological potential and that the cable route corridor may contain previously unrecorded subsurface features.

Archaeological Testing – Limited Scope

The EIAR states that archaeological testing will be undertaken in advance of construction. However:

- No pre-planning archaeological testing has been conducted;
- The extent and methodology of proposed testing are not specified;
- No assessment of whether testing will cover the full 8 km cable corridor;
- No provision for contingency if significant archaeological features are encountered.
- The deferral of archaeological testing to post-consent stages means that the Commission cannot assess:
- The likelihood of encountering significant archaeological remains;
- The potential for construction delays arising from archaeological investigations;
- Whether the proposed cable route can be constructed as designed without impacting archaeological features; and
- Whether alternative routing may be required to avoid archaeological constraints.

This represents a fundamental deficiency in the archaeological assessment process.

5.10.3 Historic Landscape Character***Athenry Heritage Town Context***

Athenry is recognised as one of the best-preserved medieval market towns in Ireland. The Athenry Town Centre First Plan states: "Athenry is celebrated for its medieval architecture, castle, and walls, attracting tourists and historians... The town is set within agricultural hinterland ..."

The historic relationship between the medieval town and its agricultural hinterland forms an integral part of Athenry's heritage significance. The surrounding rural landscape:

- Retains the historic field pattern and settlement structure;
- Preserves the visual setting of the medieval town within its agricultural context;
- Contains archaeological features reflecting continuous occupation since medieval times; and
- Contributes to the visitor experience and interpretation of the heritage town.

The Galway County Development Plan recognises this relationship through policies requiring protection of heritage assets "together with the integrity of their character and setting" (Policy ASP 39).

Impact on Heritage Setting

The introduction of large-scale electrical infrastructure within the historic hinterland of Athenry has the potential to:

- Alter the rural character of the historic landscape;
- Introduce industrial development incongruous with the medieval settlement pattern;
- Erode the visual relationship between the heritage town and its agricultural setting;
- Diminish the authenticity and integrity of the historic landscape; and
- Affect the heritage tourism experience and interpretation of cultural assets.

The EIAR does not assess impacts on heritage setting or historic landscape character. The archaeological assessment is limited to direct physical impacts on recorded monuments and does not consider the wider cultural landscape context.

This narrow interpretation of heritage assessment fails to comply with the requirement to consider impacts on the setting of heritage assets as required by national and European heritage protection frameworks.

5.10.4 Historic Environment and Land Use Change

The EIAR provides limited assessment of historic land use patterns or previous ground disturbance within the cable route corridor. Examination of historic mapping indicates:

- The landscape has been in agricultural use since at least the Ordnance Survey First Edition (1840s);
- Field boundaries and road alignments have remained largely unchanged;
- No evidence of significant previous ground disturbance or development; and
- Retention of historic landscape structure and character.

The continuity of land use and absence of previous disturbance increases the archaeological potential of the site. Areas which have not been subject to modern development are more likely to retain intact subsurface archaeological features.

The EIAR does not adequately assess historic land use patterns or their implications for archaeological potential. This represents a gap in the cultural heritage baseline assessment.

5.10.5 Construction Phase Impacts – Vibration and Ground Disturbance

The proposed construction methodology involves:

- Trenching and excavation along 8 km of cable route;
- Rock-breaking and mechanical excavation in areas of shallow bedrock;
- Heavy construction traffic on roads in proximity to recorded monuments; and
- Vibration from piling or ground stabilisation works at the substation site.

Construction-related vibration and ground disturbance have the potential to affect:

- Structural stability of recorded monuments in proximity to the works;
- Subsurface archaeological features along the cable route;
- Historic buildings and structures affected by construction traffic; and
- Historic field boundaries and stone walls.

The EIAR does not provide:

- Vibration impact assessment on heritage structures;
- Pre-construction condition survey of historic buildings and monuments;
- Monitoring strategy for construction-phase impacts on heritage assets; and
- Contingency procedures if damage to heritage features occurs.

The absence of this assessment means that construction-phase heritage impacts cannot be properly evaluated or mitigated.

5.10.6 Conclusion - Cultural Heritage

The Concern Group respectfully submits that the archaeological and cultural heritage assessment presented in the EIAR is fundamentally deficient. In particular:

- Archaeological testing has not been undertaken in advance of planning determination;
- The assessment adopts an overly narrow interpretation of heritage significance;
- Impacts on heritage setting and historic landscape character have not been assessed;
- The relationship between Athenry heritage town and its rural hinterland has not been considered;
- Construction-phase impacts on heritage assets have not been properly evaluated; and
- Compliance with heritage protection policy has not been demonstrated.

The Commission cannot be satisfied that significant adverse effects on archaeological and cultural heritage can be avoided or adequately mitigated. Permission should be refused on this ground.

5.11 Ground 11: Residential Amenity and Human Health

5.11.1 Introduction

The proposed cable route traverses approximately 8 km of narrow rural roads characterised by ribbon residential development, with multiple dwelling houses located in close proximity to the works. The scale and duration of construction activity will give rise to significant impacts on residential amenity through noise, vibration, dust, traffic disruption, visual intrusion, and loss of rural tranquillity.

The Concern Group submits that the EIAR fails to adequately assess the scale, intensity, and cumulative duration of residential amenity impacts or to demonstrate that the quality of life of affected residents can be protected during the prolonged construction period.

5.11.2 Proximity of Residential Receptors

The cable route corridor contains residential properties at the following proximities to the proposed works:

- Multiple properties with direct frontage onto roads where trenching will occur;
- Dwelling houses within 10-20m of excavation works and construction compounds;
- Residential properties reliant on roads subject to full or partial closure for access;
- Homes with direct line-of-sight to the proposed substation compound;
- Properties which will experience prolonged construction activity on roads serving their private access.
- The EIAR acknowledges the presence of these residential receptors but does not provide:
- Identification of individual properties and their specific proximity to works;

- Assessment of cumulative duration of disruption affecting each dwelling;
- Evaluation of differential impacts on vulnerable residents (elderly, young children, persons with disabilities);
- Quantified assessment of the number of people directly affected by the works. and

The absence of this receptor-specific assessment means that the Commission cannot properly evaluate the scale and acceptability of residential amenity impacts.

5.11.3 Construction Phase Noise and Vibration

Noise Impact Assessment Methodology

The EIAR presents a construction noise assessment based on predictive modelling using standard plant noise emission levels. However, the assessment adopts certain assumptions which may underestimate actual noise impacts:

- Reliance on best-case plant noise levels without margin for variability;
- Assumption of optimal equipment maintenance and operation;
- Limited consideration of impulsive or intermittent noise sources (rock-breaking, compaction);
- Inadequate assessment of night-time and weekend working requirements; and
- No assessment of cumulative noise arising from concurrent works on multiple road sections.

The assessment concludes that noise levels will comply with relevant guidelines at most receptors. However:

- Compliance with numerical guidelines does not necessarily ensure acceptable residential amenity;
- Prolonged exposure to construction noise over 18-24 months will affect quality of life;
- Rural residential areas have low baseline noise levels – construction noise will be highly intrusive; and
- The assessment does not consider cumulative duration of noise exposure affecting individual properties.

Vibration from Rock-Breaking and Excavation

The cable installation will require rock-breaking and mechanical excavation in areas where limestone bedrock is at or near ground surface. The EIAR acknowledges that vibration from these activities may be perceptible at nearby properties but concludes that structural damage is unlikely.

However, the assessment does not address:

- The potential for vibration to cause distress, sleep disturbance, or anxiety among residents;
- Effects on vulnerable residents or persons working from home;
- Cumulative stress arising from prolonged exposure to vibration events;
- The potential for vibration to affect water supply systems or septic tanks; and
- Monitoring arrangements or complaint response procedures.

The focus on structural damage risk without proper assessment of residential wellbeing impacts represents a gap in the amenity assessment.

5.11.4 Dust and Air Quality Impacts

Trenching, excavation, spoil handling, and traffic movements on unpaved surfaces will generate dust emissions affecting residential properties in proximity to the works. The EIAR proposes standard dust suppression measures including:

- Water spraying of exposed surfaces and haul routes;
- Covering of spoil stockpiles;
- Vehicle wheel washing; and
- Speed restrictions on construction haul routes.

However, the effectiveness of these measures is highly dependent on implementation, weather conditions, and ongoing monitoring. The EIAR does not demonstrate:

- That dust suppression will be effective during dry or windy conditions;
- How dust control will be maintained across 8 km of active works;
- What monitoring arrangements will be in place to verify dust control effectiveness;
- How complaints from residents will be addressed; and
- What remedial action will be taken if dust impacts exceed acceptable levels.

For residents with respiratory conditions, young children, or elderly persons, inadequate dust control can have significant health implications. The absence of a robust dust management and monitoring strategy creates unacceptable amenity and health risks.

5.11.5 Traffic Disruption and Access Impacts

Residential Access During Construction

Many properties along the cable route rely on the local road network for sole vehicular access. During periods of road closure or traffic management, residents will experience:

- Extended travel times and diversions via unsuitable alternative routes;
- Difficulty accessing homes for deliveries, healthcare visits, and emergency services;
- Constraints on everyday activities (school runs, commuting to work, shopping);
- Reduced social connectivity and isolation, particularly for elderly residents; and
- Anxiety and stress arising from uncertainty about access arrangements.

The EIAR states that "reasonable access will be maintained" but does not specify:

- What constitutes "reasonable access" in practical terms;
- Maximum acceptable diversion lengths or travel times;
- How access will be maintained during simultaneous closures on multiple sections;
- What alternative arrangements will be provided for residents unable to navigate diversion routes; and
- Compensation arrangements for residents experiencing prolonged access disruption.

The absence of these details means that residents cannot assess the practical implications of the works and the Commission cannot evaluate the acceptability of access disruption.

Impact on Home-Based Businesses and Remote Working

The cable route serves residential properties which are also used for home-based businesses, remote working, and agricultural operations. Prolonged construction disruption will affect:

- Ability to conduct business meetings or receive clients at home;
- Suitability of home environment for remote working (noise, disruption);
- Agricultural operations requiring regular vehicular access; and
- Business viability and income for self-employed residents.

The EIAR does not assess economic impacts on home-based businesses or provide any mechanism for compensation or mitigation. This represents a significant gap in the social and economic impact assessment.

5.11.6 Cumulative Duration of Disruption

A critical deficiency in the amenity assessment is the failure to quantify the cumulative duration of construction disruption affecting individual residential properties. The EIAR states that construction will extend over 18-24 months but does not specify:

- How long works will continue in proximity to specific properties;
- Whether some properties will experience multiple phases of disruption;
- The combined duration of disruption from both the grid connection and the Gannow Wind Farm project;
- Recovery periods between phases of work; and
- The total timeframe from commencement to final reinstatement and restoration.

For properties located at intersections or junctions of multiple cable routes, the cumulative disruption could extend over 3-4 years or more when both projects are considered together. The EIAR does not assess whether this prolonged disruption represents an acceptable burden on residential communities.

5.11.7 Visual Amenity and Loss of Rural Character

Beyond the direct construction phase impacts, the proposed development will result in long-term changes to visual amenity and rural character experienced by residents:

- The 220kV substation compound will be a permanent industrial feature in the rural landscape;
- Security lighting will introduce light pollution affecting dark night skies;
- The telecommunications mast will be a prominent vertical element visible from multiple properties;
- The industrial character of the substation is at odds with the rural residential setting; and

- Cumulative visual impacts from multiple electrical installations will progressively industrialise the landscape.

For residents who have chosen to live in a rural setting specifically for its tranquillity, landscape quality, and absence of industrial development, these permanent changes represent a significant diminution of residential amenity and quality of life.

The EIAR does not assess the psychological or wellbeing impacts of landscape change on long-term residents or consider whether compensation mechanisms should be provided for loss of residential amenity.

5.11.8 Health Impact Assessment Deficiency

The EIAR does not include a Health Impact Assessment (HIA) evaluating the potential effects of the development on human health and wellbeing. A comprehensive HIA would consider:

- Mental health and stress impacts arising from prolonged construction disruption;
- Physical health effects from noise, dust, and vibration exposure;
- Social impacts including isolation, community severance, and loss of social connectivity;
- Economic impacts on livelihoods and financial wellbeing; and
- Differential impacts on vulnerable groups (elderly, young children, persons with disabilities or chronic health conditions).

The absence of HIA represents a significant gap in the assessment of environmental effects on human beings as required by the EIA Directive. The Commission cannot be satisfied that health and wellbeing impacts have been properly identified and assessed.

5.11.9 Conclusion - Residential Amenity

Our client respectfully submits that the assessment of residential amenity and human health impacts is fundamentally deficient. In particular:

- Residential receptors in close proximity to the works have not been specifically identified and assessed;
- The cumulative duration of disruption affecting individual properties has not been quantified;
- Construction phase noise, vibration, and dust impacts have been inadequately assessed;
- Traffic disruption and access impacts on everyday life have not been properly evaluated;
- Long-term visual amenity and rural character impacts have not been adequately addressed;
- No Health Impact Assessment has been undertaken; and
- The combined and cumulative impacts of multiple infrastructure projects have not been assessed.

The Commission cannot be satisfied that residential amenity and human health can be protected or that the proposed development represents an acceptable burden on affected communities. Permission should be refused on this ground.

5.12 Ground 12: Procedural Compliance and Planning Law

5.12.1 Introduction

This section addresses compliance of the proposed development with the requirements of Irish and European planning and environmental law, including the Planning and Development Act 2000 (as amended), the EIA Directive, the Habitats Directive, the Water Framework Directive, and relevant national planning policy.

Our client submits that the proposed development fails to comply with statutory requirements in multiple respects, rendering the application deficient and incapable of being properly assessed or consented.

5.12.2 EIA Directive Compliance

Project Fragmentation and Integrated Assessment

Directive 2011/92/EU (as amended by Directive 2014/52/EU) requires that projects are assessed as integrated wholes and that Member States may not use fragmented consent procedures to circumvent environmental assessment requirements.

As detailed in Section 2.0 of this objection, the proposed grid connection and the Cashla Peaker Plant constitute a single integrated development project which has been inappropriately separated into multiple consent applications. This fragmentation:

- Precludes proper assessment of cumulative and in-combination effects;
- Prevents meaningful evaluation of integrated project alternatives;
- Undermines public participation in the environmental decision-making process; and
- Fails to comply with the requirement for integrated environmental assessment.

The European Court of Justice has consistently held that such fragmentation constitutes a breach of the EIA Directive (Case C-227/01, Case C-392/96). The Commission cannot lawfully grant consent to infrastructure which forms part of a fragmented project requiring integrated assessment.

Alternatives Assessment

Article 5(1)(d) of the EIA Directive requires applicants to provide "a description of the reasonable alternatives... studied by the developer... and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects."

As detailed in Section 3.0 of this objection, the alternatives assessment is fundamentally deficient:

- The Multi-Criteria Analysis concluded that all routes were "broadly comparable", indicating insufficient environmental differentiation;
- No site-specific investigation was undertaken to distinguish karst geology and groundwater risks between routes;
- Overhead line technology was discounted without proper comparative environmental assessment; and
- No assessment of integrated alternatives considering both the generating station location and grid connection routing.

The inadequacy of alternatives assessment means that the Commission cannot be satisfied that the proposed development represents the option with least environmental impact, as required by the EIA Directive.

Baseline Information Deficiencies

Annex IV of the EIA Directive requires that the EIAR includes "a description of the relevant aspects of the current state of the environment (baseline scenario)" to enable proper assessment of environmental effects.

The EIAR contains fundamental deficiencies in baseline information:

- Traffic surveys limited to one road on one day;
- No site-specific hydrogeological investigation;
- Limited-scope ecological surveys;
- No pre-works pavement condition survey; and
- No detailed archaeological testing.

The inadequacy of baseline information undermines the reliability of the entire impact assessment and precludes meaningful evaluation of environmental effects.

5.12.3 Habitats Directive Compliance

Appropriate Assessment Requirements

Article 6(3) of the Habitats Directive (Directive 92/43/EEC) requires that any plan or project likely to have a significant effect on a European site shall be subject to Appropriate Assessment. Consent may only be granted where the competent authority has ascertained that the plan or project "will not adversely affect the integrity of the site concerned."

As detailed in Section 8.0 of this objection, the Natura Impact Statement is fundamentally deficient:

- Hydrological pathways to European sites have not been properly characterised through site-specific investigation;
- The assessment relies on generic mitigation measures without demonstration of effectiveness in karst environments;
- In-combination effects have not been adequately assessed; and
- The precautionary principle has not been properly applied.

In the absence of scientific certainty that the development will not adversely affect European sites, the Commission is precluded from granting consent under the Habitats Directive.

5.12.4 Water Framework Directive Compliance

The Water Framework Directive (Directive 2000/60/EC) establishes a framework for the protection of inland surface waters, transitional waters, coastal waters, and groundwater. Article 4 requires that Member States:

- Implement measures to prevent deterioration of the status of water bodies;
- Protect, enhance, and restore water bodies with the aim of achieving good status; and
- Progressively reduce pollution of water bodies.

As detailed in Section 6.0 of this objection, the proposed development creates significant risks to groundwater quality within the Corrib Groundwater Body (Status: Good). The construction works have the potential to cause deterioration through:

- Contamination from cement-based materials;
- Fuel, oil, and chemical spillages;
- Sediment-laden dewatering discharges; and
- Alteration of groundwater flow pathways.

The EIAR does not demonstrate that the development can be undertaken without risk of water quality deterioration or that adequate protection measures will prevent Water Framework Directive non-compliance.

The Commission cannot grant consent to a development which creates an unacceptable risk of Water Framework Directive breach.

5.13 Ground 13: Planning Policy Compliance Concerns

5.13.1 Galway County Development Plan 2022-2028

The proposed development must comply with the policies and objectives of the Galway County Development Plan. Relevant policies include:

- Policy LCR 1: Landscape Character – "Protect and enhance the landscape and visual amenity of County Galway."
- Policy HER 5: Archaeological Heritage – "Preserve and protect the archaeological heritage of County Galway."
- Policy NHB 4: European Sites – "Protect European sites and ensure that development does not adversely affect the integrity of any European site."

As detailed throughout this objection, the proposed development is inconsistent with these policies:

- Landscape and visual amenity will be significantly adversely affected by industrial infrastructure;
- Archaeological heritage has not been adequately assessed or protected;
- Adverse effects on European sites cannot be excluded; and
- Rural character and residential amenity will be materially harmed.

The development is therefore contrary to the proper planning and sustainable development of the area as expressed in the statutory Development Plan.

5.13.2 Athenry Local Area Plan

The Athenry Local Area Plan includes specific policies for the protection of heritage setting and rural character:

- Policy ASP 39: "Ensure the protection [of heritage assets] together with the integrity of their character and setting."
- Policy ASP 40: "Protect, conserve and enhance... the character... respecting... setting of the Architectural Conservation Areas."

The proposed development, located within the historic hinterland of Athenry heritage town, fails to respect the character and setting of heritage assets and is inconsistent with these Local Area Plan policies.

5.13.3 Proportionality and Public Interest

An Coimisiún Pleanála is required to balance the identified environmental, residential, and heritage impacts against the planning benefits and public interest justification for the proposed development.

In the present case:

- The grid connection infrastructure serves solely to facilitate the operation of the Cashla Peaker Plant;
- The peaker plant is subject to a separate planning application which has not been determined;
- The public interest justification for the development is entirely dependent on the case for the generating station;
- No independent planning benefit arises from the grid connection in isolation; and
- The identified environmental and residential impacts are significant and inadequately mitigated.

The Commission cannot properly assess proportionality without first determining the acceptability of the peaker plant itself. The fragmented consent approach prevents proper evaluation of whether the overall project serves the public interest in a manner which justifies the identified environmental harm.

5.13.4 Conclusion on Planning Law Compliance

Our client respectfully submits that the proposed development fails to comply with the requirements of Irish and European planning and environmental law in multiple fundamental respects:

- Project fragmentation breaches the EIA Directive requirement for integrated assessment;
- Alternatives assessment is inadequate and fails to identify the least environmentally damaging option;
- Baseline information is deficient and undermines the reliability of impact assessment;
- Appropriate Assessment has not demonstrated that European sites will not be adversely affected;
- Risks to water quality create potential Water Framework Directive non-compliance;
- Development Plan policies for landscape, heritage, and environmental protection are not satisfied; and
- Proportionality cannot be properly assessed in the absence of determination on the wider project.

These deficiencies are fundamental and cannot be remedied through conditions or further information. Permission should be refused.

5.14 Ground 14: Group concerns align with statutory authorities

The proposed grid connection is premature, inadequate, and contrary to proper planning and sustainable development due to unresolved cumulative impacts, road safety deficiencies, and environmental risks highlighted by statutory bodies

The Athenry Peaker Plant Concern Group strongly objects to the proposed underground grid connection (VA07.324162) and fully endorses and adopts the detailed concerns raised in the submissions from Galway County Council, Transport Infrastructure Ireland (TII), and the Department of Housing, Local Government and Heritage submission - ACP-324113-26. These statutory submissions identify fundamental shortcomings in the application that align closely with the serious local community concerns regarding traffic, biodiversity, landscape, and cumulative industrialisation in the Athenry area.

Detailed Common Grounds Between the Statutory Bodies and the Concern Group:

- **Serious Deficiencies in Road Safety and Construction Traffic Management** - TII's submission (TII26-135457) raises significant concerns regarding the transportation of Exceptional Abnormal Loads (up to 380 tonnes for the generator and 360 tonnes for the gas turbine) and the overall management of construction traffic on the local and national road network, including the M6, M18, L3103, L7109, and L7108. TII emphasises the need for proper abnormal load permits under Department of Transport Circular RW18 of 2024, pre- and post-construction surveys, and a comprehensive Abnormal Load Management Plan. Galway County Council also notes the potential for substantial HGV movements during construction. The Concern Group fully supports these positions. The proposed grid connection route will generate heavy construction traffic through rural roads serving residential areas and schools in Athenry. The lack of a sufficiently detailed Construction Traffic Management Plan that addresses cumulative traffic impacts with the main Peaker Plant and other developments is a material defect.
- **Inadequate Assessment of Cumulative and In-Combination Effects** - Both Galway County Council and TII highlight the need for a proper assessment of cumulative impacts, particularly with other energy projects (e.g. the concurrent Gannow Windfarm grid connection). TII specifically notes that both projects seek to utilise similar sections of local roads and motorway crossings, raising concerns about deliverability and network disruption. The Concern Group strongly agrees. The grid connection cannot be assessed in isolation from the main 300MW Peaker Plant (ACP-324113-26) or other industrial/energy developments in the Athenry area. The EIAR and NIS fail to adequately address the combined long-term impacts on traffic, air quality, noise, biodiversity, and landscape.
- **Biodiversity and Appropriate Assessment Shortcomings** - Galway County Council identifies potential hydrogeological pathways to Galway Bay Complex SAC (000268), Inner Galway Bay SPA (004031), and Cregganna Marsh SPA (004142). The Council notes that a full Natura Impact Statement is required. The Concern Group fully concurs. The AA Screening and NIS submitted are inadequate. The cable route

crosses sensitive hydrological connections, and the cumulative biodiversity effects with the main Peaker Plant have not been robustly assessed.

- **Technical Deficiencies in Grid Routing and Motorway Crossings** - TII highlights that the proposal involves three HDD motorway crossings (one of the M18 and two of the M6) and stresses the need for co-ordination with other projects to minimise impact on the strategic road network. TII also requires specific safeguards for any works near or under the motorway reservation. The Concern Group supports this view. The routing and construction methodology have not been sufficiently justified or mitigated, particularly given the rural character of the area and proximity to residential properties.
- **Landscape, Visual, and Amenity Impacts** - The statutory submissions note the introduction of significant infrastructure into a rural/semi-rural landscape. The Concern Group adds that the grid connection, when combined with the main plant, will contribute to the further industrialisation of the Athenry hinterland, adversely affecting residential amenity, property values, and the attractiveness of the area for tourism and living.
- **Failure to Conclude No Adverse Effect on European Sites (Appropriate Assessment)** - The Department of Housing, Local Government and Heritage has concluded that, on the basis of the information provided, it cannot be established beyond reasonable scientific doubt that the proposed development (including the grid connection) will not adversely affect the integrity of European sites, either alone or in combination with other plans and projects. The Concern Group fully supports this position. Significant uncertainty remains in relation to hydrological connectivity, disturbance, and in-combination effects. The application should therefore be refused as it fails to comply with Article 6(3) of the Habitats Directive.
- **Inadequate Assessment of Hydrological Connectivity** - The Department states that the Natura Impact Statement (NIS) relies on generalised assumptions and does not provide sufficient site-specific evidence or detailed mapping of drainage pathways to demonstrate the absence of hydrological connectivity to the Galway Bay Complex SAC and other European sites. The Concern Group shares this concern. The risk of surface water runoff, sediment, and accidental pollution events during construction has not been adequately characterised. This represents a fundamental deficiency in the assessment.
- **Insufficient Ornithological Baseline and Disturbance Assessment** - The Department highlights that the breeding and wintering bird surveys are limited in scope, number of visits, and spatial coverage. The assessment does not adequately consider functionally linked lands or the potential for displacement of species such as Golden Plover. The Concern Group agrees that the disturbance assessment (including lighting, noise, and human activity) is insufficiently developed. The proposed development would therefore pose an unacceptable risk to bird species associated with nearby SPAs.
- **Major Deficiencies in Bat Assessment** - The Department identifies serious shortcomings in the bat survey work, including the lack of multi-season surveys (only June data), absence of detailed roost assessments, and failure to evaluate the impact of extensive proposed artificial lighting (up to 20m high luminaires achieving 10 lux). The Concern Group shares these concerns. The potential disruption to commuting routes, foraging habitat, and swarming behaviour has not been properly assessed. This is particularly significant given the sensitivity of bat species to lighting and disturbance.
- **Inadequate and Insufficiently Specific Mitigation Measures** - The Department notes that many of the mitigation measures proposed in the NIS are described in general terms, lack specificity, and do not demonstrate how they will be effective in this specific context. The Concern Group supports this view. Mitigation must be precise, certain, and enforceable. The current proposals fall short of what is required for Appropriate Assessment.

Additional concerns of the Athenry Peaker Plant Concern Group which are reflected in these other submissions:

- The grid connection forms an integral and indivisible part of the overall Peaker Plant project and should not be fragmented for assessment purposes.
- Insufficient meaningful consultation with the local community.
- The proposal conflicts with Ireland's decarbonisation objectives and the transition to renewable energy, representing a retrograde step reliant on fossil fuel infrastructure.

Conclusion

The submissions from Galway County Council, Transport Infrastructure Ireland, and the Department demonstrate that the application, as currently presented, is fundamentally deficient in its assessment of traffic, road safety, cumulative impacts, and biodiversity effects. These deficiencies are of direct and significant concern to the local community represented by the Athenry Peaker Plant Concern Group.

We therefore respectfully request that ACP refuse permission for the grid connection under case reference VA07.324162. In the alternative, ACP should require Substantial Further Information to address all the points raised jointly by the statutory bodies and the local community before any determination is made.

6.0 Attached Community and expert submissions

In preparing this planning objection, BPS has been summarising and/or relying on the two attachments to this report which are:

- **Attachment 1** - Community Submission / Objection Notes to An Coimisiún Pleanála prepared by Athenry Peaker Plant Concern Group, c/o Chair, Oliver Freeney, Castletambert, Athenry, Co. Galway, H65RX77.
- **Attachment 2** - Áine McCann BSc(Hon) Environmental Scientist Expert Observation in respect of Strategic Infrastructure Development Planning Application VA07.324162.

These attachments are summarised as follows:

Attachment 1

This is the formal community submission, prepared with input from residents directly affected by the project. It complements the McCann report and focuses on local impacts and procedural fairness. The community wanted to set out its concerns in their own words while having these concerns also articulated by BPS. ACP is asked to carefully review this submission.

Key Findings:

- **Integrated Project Argument:** Repeatedly stresses that the grid connection is not standalone but forms an essential, interdependent part of the overall Cashla Peaker Project. Fragmented consenting undermines proper planning.
- **Construction & Amenity Impacts:** Significant concern regarding prolonged construction disruption, road closures, noise, dust, vibration, and impacts on residential amenity, local schools, and daily life in a rural community.
- **Infrastructure Constraints:** Highlights practical deliverability issues, including cumulative corridor pressures, unresolved separation distances between cables, and interaction with existing utilities (e.g. gas pipelines).
- **Policy Conflict:** Argues the development conflicts with the Galway County Development Plan 2022-2028, climate policy, and the proper planning and sustainable development of the rural area.
- **Procedural & Participation Issues:** Criticises the complexity and fragmentation of the documentation, which hinders meaningful public participation.

The submission is comprehensive, well-referenced, and includes detailed chapters on traffic, biodiversity, hydrology, landscape, and residential amenity.

Attachment 2

This independent expert report, prepared by Áine McCann BSc (Hons) Environmental Scientist, provides a detailed technical critique of the EIAR and planning documentation for the proposed 8.1km 220kV underground grid connection.

Key Findings:

- **Project Splitting & Inadequate Cumulative Assessment:** Strongly argues that the grid connection cannot be assessed in isolation from the main Cashla Peaker Plant (ACP-324113-26). The fragmentation prevents a proper integrated assessment of cumulative effects.
- **Site Description & Visual Impact:** Highlights serious deficiencies in the baseline description of the receiving environment. The site is undulating (up to 5m elevation change) in a low-lying karst area, yet this is not adequately reflected. No comprehensive 3D visualisations or photomontages are provided for the full project (including the 30m stack and 36m mast).
- **Traffic & Construction Impacts:** Detailed criticism of the traffic assessment, which is based on very limited survey data. Predicts significant disruption on constrained rural roads (L3103, L7108, L7109),

including prolonged road closures, abnormal loads, and cumulative impacts with other projects (e.g. Gannow Wind Farm).

- **Biodiversity & AA Deficiencies:** Raises concerns regarding inadequate bat surveys (single season only), lack of roost assessment, and insufficient evaluation of lighting impacts. Questions the robustness of the NIS in relation to hydrological pathways to European sites.
- **Karst & Groundwater:** Emphasises the high vulnerability of the karst limestone setting and the risks associated with trenching and HDD works.

The attachment is well-structured, evidence-based, and includes extensive photographic evidence and references to EU case law on project splitting and public participation.

Overall Conclusion (both attachments)

Both documents provide strong, mutually reinforcing grounds for objection that have been relied on by BPS. They demonstrate that:

- The application has not properly assessed the development as part of an integrated project.
- There are material deficiencies in the EIAR and NIS, particularly regarding cumulative effects, visual impact, traffic, bats, and karst hydrology.
- Significant uncertainty remains, such that the Commission cannot be satisfied, beyond reasonable scientific doubt, that the proposal will not adversely affect European sites or the proper planning of the area.

Recommendation

These documents strongly support a recommendation for refusal of permission for VA07.324162, or, at minimum, a request for substantial further information to address the identified deficiencies.

7.0 Conclusion

In light of the foregoing, it is respectfully submitted that there is a clear and consistent body of planning precedent, both at the level of An Coimisiún Pleanála and across major infrastructure decisions, which supports the refusal of large-scale SID developments where fundamental issues arise in relation to site suitability, environmental assessment, public safety, and residential amenity.

This Planning Objection Report, prepared by BPS Planning & Development Consultants on behalf of Athenry Peaker Plant Concern Group, has identified fundamental deficiencies in the planning application for grid connection infrastructure at Athenry, County Galway (ACP Ref: 324162).

The principal grounds for objection are summarised as follows:

Project Fragmentation

The proposed grid connection and the Cashla Peaker Plant constitute a single integrated development project which has been inappropriately separated into multiple consent applications. This fragmentation:

- Breaches the EIA Directive requirement for integrated environmental assessment;
- Precludes proper assessment of cumulative and in-combination effects;
- Prevents meaningful evaluation of integrated alternatives;
- Undermines public participation in environmental decision-making; and
- Fails to provide a reliable basis for planning determination.

Alternatives Assessment

The alternatives assessment is fundamentally deficient and fails to demonstrate that the proposed development represents the option with least environmental impact. Key deficiencies include:

- Infrastructure-led site selection rather than environmentally-led assessment;
- Multi-Criteria Analysis concluding all routes "broadly comparable" without proper differentiation;
- Inadequate investigation of karst geology and groundwater sensitivity differences between routes;
- Overhead line technology discounted without comparative environmental assessment; and
- Failure to assess integrated alternatives considering both generating station and grid connection.

Traffic and Construction Impacts

The traffic and transport assessment is deficient and fails to demonstrate that construction works can be undertaken without unacceptable impacts:

- Baseline traffic surveys limited in scope and duration;
- No consolidated closure programme demonstrating feasibility of traffic management;
- Mutually dependent diversion routes without demonstrated capacity;
- Emergency access requirements inadequately addressed;
- Pavement reinstatement and long-term integrity concerns unresolved; and
- Critical infrastructure interactions (Castlelambert Overbridge, gas pipeline) requiring further design.

Cumulative Infrastructure Impact

The shared corridor occupation with the Gannow Wind Farm grid connection creates cumulative impacts which have not been adequately assessed:

- Two major cable installations in the same constrained rural road corridor;
- Prolonged cumulative disruption to the same residential communities;
- Physical infrastructure constraints and long-term maintenance implications; and
- Disparity in EIAR methodologies between related projects on the same roads.

Hydrogeology and Groundwater

The development is located in a highly vulnerable karst limestone environment with documented connectivity to European sites. The hydrogeological assessment is deficient:

- No site-specific investigation to characterise groundwater conditions;
- Construction-phase contamination risks inadequately assessed;
- Water Framework Directive compliance not demonstrated; and
- Reliance on generic mitigation without demonstration of effectiveness in karst settings.

Landscape and Visual Impact

The landscape and visual impact assessment adopts constrained study area and limited viewpoint selection:

- Study area departs from Planning Authority recommendations;
- Photomontages present winter-only scenarios;
- Mitigation inadequate to screen prominent infrastructure;
- Lighting impacts not properly assessed;
- Cumulative landscape effects inadequately evaluated; and
- Impacts on heritage landscape setting not addressed.

Biodiversity and Ecology

The ecological assessment and Appropriate Assessment process are deficient:

- Limited-scope baseline surveys;
- Hedgerow assessment does not quantify ecological value;
- Natura Impact Statement relies on desk-based assessment without site-specific investigation;
- Hydrological pathways to European sites inadequately characterised;
- In-combination effects not properly assessed; and
- Adverse effects on European sites cannot be excluded.

Cultural Heritage

The archaeological and heritage assessment adopts overly narrow interpretation:

- Archaeological testing not undertaken in advance of planning determination;
- Impacts on heritage setting and historic landscape not assessed;
- Relationship with Athenry heritage town not properly considered; and
- Construction-phase heritage impacts inadequately evaluated.

Residential Amenity

The assessment of residential amenity impacts is inadequate:

- Individual residential receptors not specifically identified and assessed;
- Cumulative duration of disruption not quantified;

- Noise, vibration, and dust impacts inadequately assessed;
- Traffic disruption and access impacts on everyday life underestimated;
- No Health Impact Assessment undertaken; and
- Long-term visual amenity impacts not adequately addressed.

Planning Law Non-compliance

The proposed development fails to comply with Irish and European planning law:

- EIA Directive requirements for integrated assessment not met;
- Habitats Directive Appropriate Assessment inadequate;
- Water Framework Directive compliance not demonstrated;
- Development Plan policies for landscape, heritage, and environment not satisfied; and
- Proportionality cannot be assessed in isolation from wider project.

Material Contraventions and Policy Conflicts

The proposed development is inconsistent with the policies and objectives of the Galway County Development Plan 2022-2028 and the Athenry Local Area Plan, including:

- Policy LCR 1: Protection of landscape character and visual amenity;
- Policy HER 5: Preservation and protection of archaeological heritage;
- Policy NHB 4: Protection of European sites;
- Policy ASP 39: Protection of heritage setting and character; and
- Policy ASP 40: Conservation and enhancement of heritage areas.

The development is therefore contrary to the proper planning and sustainable development of the area.

Inadequacy of Environmental Impact Assessment

The cumulative effect of baseline information deficiencies, inadequate impact assessment, unresolved design matters, and deferred technical investigations means that the EIAR does not provide a reliable basis for environmental consent.

The Commission cannot be satisfied that:

- All significant environmental effects have been identified and assessed;
- The proposed mitigation measures will be effective;
- Residual impacts after mitigation are acceptable;
- Cumulative and in-combination effects have been properly evaluated; and
- The development represents the option with least environmental impact.

In the absence of a reliable environmental assessment, the Commission is precluded from granting consent under the EIA Directive and the Planning and Development Act 2000 (as amended).

BPS respectfully submits that the proposed grid connection infrastructure, when considered both individually and in combination with the wider Cashla Peaker Project, gives rise to serious planning, environmental, residential, and procedural concerns which have not been adequately addressed in the application documentation.

The identified deficiencies in environmental assessment, the inadequacy of baseline information, the unresolved environmental risks, and the failure to comply with the requirements of Irish and European planning law mean that the Commission cannot properly assess the acceptability of the proposed development or grant environmental consent.

When the cumulative environmental, infrastructural, residential, and community impacts are considered alongside the inadequacy of assessment, the limited planning benefits, and the policy conflicts, it is clear that the proposed development does not represent proper planning and sustainable development.

An Coimisiún Pleanála is therefore respectfully requested to refuse permission for the proposed development.

8.0 Recommendation

Having regard to the grounds set out in this Planning Objection Report, BPS respectfully recommends that An Coimisiún Pleanála refuse permission for the proposed development (ACP Ref: 324162) on the following grounds:

1. The proposed development, by reason of project fragmentation and separation from the functionally dependent Cashla Peaker Plant, fails to comply with the requirements of the EIA Directive for integrated environmental assessment and precludes proper evaluation of cumulative impacts, alternatives, and environmental effects. The development is therefore contrary to the proper planning and sustainable development of the area.
2. The proposed development, by reason of inadequate alternatives assessment, failure to properly differentiate environmental effects between route options, and inadequate investigation of karst geology and groundwater sensitivity, has not been demonstrated to represent the option with least environmental impact as required by the EIA Directive. The development is therefore contrary to the proper planning and sustainable development of the area.
3. The proposed development, by reason of its location within a highly vulnerable karst limestone environment, inadequate hydrogeological investigation, unresolved construction-phase contamination risks, and failure to demonstrate Water Framework Directive compliance, would give rise to unacceptable risks to groundwater quality and European sites. The development is therefore contrary to the proper planning and sustainable development of the area and would contravene the requirements of the Water Framework Directive and the Habitats Directive.
4. The proposed development, by reason of prolonged construction disruption, traffic impacts, noise, vibration, dust, and visual intrusion affecting residential properties in close proximity to the works, would seriously injure the residential amenities of property in the vicinity and would be contrary to the proper planning and sustainable development of the area.
5. The proposed development, by reason of inadequate landscape and visual impact assessment, constrained study area, limited viewpoint selection, and failure to properly assess lighting impacts and cumulative landscape effects, has not been demonstrated to be acceptable in landscape and visual terms. The development would result in significant adverse visual impacts and progressive industrialisation of a sensitive rural landscape, contrary to the proper planning and sustainable development of the area.
6. The proposed development, by reason of inadequate Appropriate Assessment, failure to properly characterise hydrological pathways to European sites, inadequate assessment of in-combination effects, and absence of scientific certainty regarding impacts on European sites, would be contrary to the requirements of Article 6(3) of the Habitats Directive. The Commission cannot grant consent where it has not been ascertained that the development will not adversely affect the integrity of European sites.
7. The proposed development, by reason of inadequate assessment of impacts on archaeological heritage, heritage setting, and historic landscape character, and failure to undertake pre-determination archaeological testing, would be contrary to the policies and objectives of the Galway County Development Plan and the Athenry Local Area Plan for the protection of heritage assets and their setting. The development would be contrary to the proper planning and sustainable development of the area.
8. The Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) submitted with the application do not adequately assess the cumulative and in-combination effects of the proposed grid connection with the associated Cashla Peaker Plant and other energy infrastructure projects in the Athenry area. Having regard to the submission of Galway County Council, the information before the Commission is insufficient to enable a complete assessment of the likely significant effects on the environment, particularly in respect of biodiversity, traffic, and landscape. The proposed development would therefore be contrary to the proper planning and sustainable development of the area.
9. The proposed development involves the transportation of Exceptional Abnormal Loads (including components weighing up to 380 tonnes) and significant construction traffic on the local and national road network. Having regard to the submission of Transport Infrastructure Ireland, the applicant has failed to demonstrate that a robust Abnormal Load Management Plan, pre- and post-construction road surveys, and appropriate structural assessments of motorway crossings have been completed in accordance with Department of Transport Circular RW18 of 2024. The development would therefore endanger the safety and strategic function of the national road network and would be contrary to the proper planning and sustainable development of the area.
10. The proposed grid connection includes multiple HDD crossings of the M6 and M18 motorways. Having regard to the submission of Transport Infrastructure Ireland, the application does not contain sufficient detail or safeguards to ensure that these crossings can be carried out without risk to the integrity of the motorway network, associated structures, or drainage systems. No consent has been provided by TII for any works within the motorway reservation. The proposed development would therefore be contrary to the proper planning and sustainable development of the area.

11. Having regard to the submission of Galway County Council, the Natura Impact Statement has not sufficiently demonstrated that the proposed development, either individually or in combination with other plans and projects, would not adversely affect the integrity of the Galway Bay Complex SAC (000268), Inner Galway Bay SPA (004031), and Cregganna Marsh SPA (004142), particularly via potential hydrogeological pathways. The information before the Commission is insufficient to allow it to conclude, beyond reasonable scientific doubt, that the development would not adversely affect these European Sites. The proposed development would therefore contravene Articles 6(3) of the Habitats Directive and would be contrary to the proper planning and sustainable development of the area.
12. The application does not adequately address the potential for on-site external lighting to cause glare, overspill, or distraction to road users on the adjoining national motorway network. Having regard to the submission of Transport Infrastructure Ireland, no detailed lighting design or mitigation measures have been provided. The proposed development would therefore be prejudicial to road safety and contrary to the proper planning and sustainable development of the area.
13. The Commission, having regard to the submission of the Department of Housing, Local Government and Heritage (dated 24 April 2026, Ref: SID-GW-2026-006), is not satisfied that it can be concluded, beyond reasonable scientific doubt, that the proposed development, either individually or in combination with other plans and projects, would not adversely affect the integrity of the Galway Bay Complex SAC (000268), Inner Galway Bay SPA (004031), and Cregganna Marsh SPA (004142). The Natura Impact Statement submitted does not provide sufficient information to enable the Commission to carry out a complete and appropriate assessment in accordance with Article 6(3) of the Habitats Directive. The proposed development would therefore contravene the Habitats Directive and would be contrary to the proper planning and sustainable development of the area.
14. The Natura Impact Statement fails to adequately demonstrate the absence of hydrological connectivity between the proposed grid connection works and European sites. Having regard to the Department's submission of (Department of Housing, Local Government and Heritage dated 24 April 2026, Ref: SID-GW-2026-006), the assessment relies on generalised assumptions rather than detailed site-specific mapping of drainage pathways, surface water runoff, or pollution prevention measures. In the absence of such evidence, the potential for significant effects on European sites via hydrological pathways cannot be excluded. The proposed development would therefore be contrary to the proper planning and sustainable development of the area.
15. The ornithological assessment submitted with the application is inadequate. Having regard to the Department's submission of (Department of Housing, Local Government and Heritage dated 24 April 2026, Ref: SID-GW-2026-006), the breeding and wintering bird surveys are limited in scope, duration, and spatial coverage and do not sufficiently assess the potential for disturbance or displacement of bird species of conservation concern, including Golden Plover, from functionally linked habitats associated with nearby Special Protection Areas. The proposed development would therefore pose an unacceptable risk to the conservation objectives of European sites and would be contrary to the proper planning and sustainable development of the area.
16. The bat assessment submitted is insufficient. Having regard to the Department's submission of (Department of Housing, Local Government and Heritage dated 24 April 2026, Ref: SID-GW-2026-006), the surveys are limited to a single season (June), lack multi-season data, do not include a detailed roost assessment, and fail to evaluate the significant impacts of the proposed extensive artificial lighting regime on commuting routes and foraging habitat. The potential adverse effects on bat species cannot be adequately assessed on the basis of the information provided. The proposed development would therefore be contrary to the proper planning and sustainable development of the area.
17. The mitigation measures proposed in the Natura Impact Statement are insufficiently precise, certain, or enforceable. Having regard to the Department's submission of (Department of Housing, Local Government and Heritage dated 24 April 2026, Ref: SID-GW-2026-006), many measures are described in general terms without adequate site-specific detail or demonstration of their effectiveness. In the absence of robust and specific mitigation, it is not possible to conclude that adverse effects on European sites would be avoided. The proposed development would therefore be contrary to the proper planning and sustainable development of the area.

Signed:

Brendan Buck

BPS Planning Consultants LTD
Members of the Irish Planning Institute
26 May 2026



Planning & Development
Consultants



ATHENRY
Peaker Plant
Concern Group

Attachment 1

Community Submission /
Objection to An Coimisiún
Pleanála prepared by the
Athenry Peaker Plant Concern
Group

SUBMISSION OVERVIEW

Introduction and Statement of Concerns

This submission is made by the Athenry Peaker Plant Concern Group on behalf of residents in the Athenry area in respect of the proposed **grid connection development (ACP Ref: 324162) associated with the Cashla Peaker Plant**.

This submission should be read in conjunction with the Concern Group's submission under **ACP Ref: 324113 (Cashla Peaker Plant)**, as the proposed grid connection does not constitute standalone infrastructure but forms an integral and dependent component of a single overall project.

The proposed development comprises high-voltage electrical infrastructure, including an approximately 8 km underground cable route, a new 220kV substation compound, trenching and road-opening works, underground cabling and associated permanent electrical infrastructure within a sensitive rural environment characterised by dispersed residential properties, agricultural land use, constrained rural roads, groundwater-sensitive karst limestone geology, ecological corridors and established rural landscape character.

The Concern Group notes that the applicant's own Planning Statement confirms that:

- substantial trenching and road-opening works will be required;
- full and partial road closures may occur during construction;
- concurrent infrastructure works are anticipated;
- aspects of the final underground cable alignment may be subject to later adjustment;
- and the proposed infrastructure forms part of the wider integrated Cashla Peaker Project.

The receiving environment comprises an established mixed rural-residential landscape characterised by ribbon development, agricultural activity, school-related traffic, commuter movement, local businesses, constrained rural roads and high sensitivity to prolonged infrastructure disruption.

Many of the concerns identified within this submission arise directly from the applicant's own engineering and technical documentation, including acknowledged unresolved infrastructure interaction, deferred design matters, cumulative corridor constraints and uncertainty regarding final infrastructure configuration.

The Concern Group identifies significant planning, environmental and cumulative-impact concerns regarding the proposed development, including:

- the fragmented assessment and consenting of infrastructure forming part of a single integrated project together with the generating station and associated infrastructure;
- the inadequacy of cumulative and in-combination environmental assessment;
- significant risks to groundwater and the water environment arising from trenching and construction activities within a highly vulnerable karst limestone setting;
- potentially significant impacts on residential amenity, local communities and constrained rural road infrastructure arising from prolonged construction activity and permanent industrial infrastructure;
- visual, landscape and lighting impacts arising from the proposed substation, telecommunications mast and associated infrastructure;
- uncertainty regarding final infrastructure configuration and route alignment;
- and concerns regarding the compatibility of the proposed development with the proper planning and sustainable development of the area when considered in conjunction with the wider Cashla Peaker Project.

The Concern Group respectfully submits that the cumulative effect of unresolved design detail, deferred technical assessment, unresolved infrastructure interaction, incomplete cumulative assessment and acknowledged uncertainty materially limits the reliability of the EIAR as a basis for environmental assessment and planning determination.

Basis of Submission – Core Concerns

This submission is based on a detailed review of:

- the Environmental Impact Assessment Report and supporting documentation submitted with the application;
- the documentation associated with ACP Ref: 324113;
- the applicant's Planning Statements and technical reports;
- and relevant national and European planning and environmental law.

The Concern Group respectfully submits that the proposed development gives rise to significant concerns regarding:

- **incomplete cumulative assessment** — failure to assess the development in combination with the Cashla Peaker Plant and other planned infrastructure;
 - **project fragmentation** — the separation of interdependent infrastructure into multiple consent processes;
 - **groundwater vulnerability** — trenching and construction activities within a highly vulnerable karst limestone setting;
 - **unresolved infrastructure interaction** — practical deliverability of the underground cable corridor having regard to cumulative infrastructure constraints, unresolved separation distances and prolonged traffic management requirements
 - **deferred design detail** — material uncertainty regarding final route alignment, construction methodology and separation distances which undermines the reliability of the environmental assessment;
 - **inadequate baseline data** — particularly in relation to traffic, groundwater and residential amenity impacts;
 - and **failure to demonstrate proper planning** — the applicant has not shown that the proposed development, either individually or cumulatively with the wider Cashla Peaker Project, is consistent with the proper planning and sustainable development of the area.
-

Conclusion and Overarching Concern

The Concern Group respectfully submits that the proposed development gives rise to serious planning, environmental, residential and cumulative-impact concerns which have not been adequately addressed within the application documentation.

In particular, significant concerns remain regarding:

- project fragmentation and the separation of interdependent infrastructure into multiple consent processes;
- the inadequacy of cumulative and in-combination environmental assessment;
- groundwater vulnerability and hydrogeological risk within a sensitive karst limestone environment;
- prolonged construction disruption arising from trenching, road-opening works and associated infrastructure activity;
- uncertainty regarding the final route alignment and associated environmental impacts;
- long-term landscape, visual and lighting impacts arising from permanent electrical infrastructure;
- and the cumulative industrialisation of the surrounding rural environment.

When assessed cumulatively, the identified environmental, infrastructural and community impacts materially outweigh the limited and insufficiently justified planning benefits associated with the proposed development.

The Concern Group further submits that the proposed development cannot be properly assessed in isolation from the wider integrated Cashla Peaker Project.

Accordingly, having regard to the deficiencies identified within the EIAR, the unresolved cumulative impacts associated with the wider integrated Cashla Peaker Project, the acknowledged environmental sensitivity of the receiving environment, the scale of the proposed infrastructure intervention and the material uncertainty remaining regarding likely significant environmental effects, the Concern Group respectfully submits that An Coimisiún Pleanála cannot presently be satisfied that the proposed development is consistent with the proper planning and sustainable development of the area. **In these circumstances, and applying the precautionary principle, permission should therefore be refuse**

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1 Introduction

We, the Athenry Peaker Plant Concern Group, comprising residents and stakeholders within the affected receiving environment, submit this formal observation in respect of the proposed 220kV substation, underground grid connection, and associated infrastructure development (ACP Ref: 324162) linked to the wider Cashla Peaker Project located in the townlands of Pollnagroagh and Rathmorrissy, Athenry, Co. Galway.

This submission has been prepared following a detailed review of the Environmental Impact Assessment Report (EIAR), including the Non-Technical Summary, technical appendices, planning documentation, supporting reports, and associated application materials, together with documentation associated with ACP Ref: 324113 and relevant national and European planning, environmental, and climate policy frameworks.

The Concern Group wishes to make clear that its objection is not to energy security, electricity infrastructure, or national energy policy in principle. Rather, the concerns raised within this submission relate to the scale, location, cumulative impacts, and inadequacy of the assessment of the proposed development within an established rural and residential environment directly affecting homes, farms, local roads, and the wider community.

The Concern Group further notes the significant scale and technical complexity associated with strategic infrastructure applications of this nature, and the practical challenges this may present for meaningful public participation by affected residents and community members.

The Concern Group is further concerned that the fragmented presentation of the proposed infrastructure across multiple application documents, technical appendices and separate consent processes, makes it particularly difficult for affected residents and members of the public to fully understand the overall scale, physical extent, cumulative construction burden, visual impact and long-term implications of the wider integrated project within the receiving environment.

The proposed development comprises substantial electrical infrastructure, including a new 220kV substation compound, underground cable infrastructure, trenching and road-opening works, telecommunications infrastructure, lighting, security infrastructure, and associated construction and access works extending through an established rural-residential environment.

The Concern Group submits that the EIAR and supporting documentation contain significant deficiencies and unresolved uncertainties regarding assessment methodology, cumulative environmental assessment, construction impacts, infrastructure interaction, and the assessment of the proposed development within the context of the wider integrated Cashla Peaker Project.

Particular concern arises regarding the separation of interconnected infrastructure into multiple consent processes, which risks preventing a complete, transparent, and integrated assessment

of the cumulative environmental effects arising from the wider project and associated infrastructure.

This submission addresses cumulative environmental effects, groundwater and hydrological risks, construction and infrastructure impacts, residential amenity concerns, and the long-term landscape, environmental, and community implications arising from the proposed development. It should be read together with the Concern Group's submission under ACP Ref: 324113, as the proposed grid connection and substation infrastructure form integral and interdependent components of the wider Cashla Peaker Project.

The Concern Group further submits that unresolved design detail, deferred technical assessment, acknowledged infrastructure interaction, and uncertainty regarding final infrastructure configuration materially limit the reliability of the EIAR as a basis for environmental assessment and planning determination.

1.1 Nature of Receiving Environment

The proposed development is located within a sensitive rural receiving environment characterised by dispersed residential occupation, ribbon development, agricultural land use, constrained local and regional roads, vulnerable groundwater-dependent karst limestone geology, ecological corridors, hedgerows and established rural landscape character.

The receiving environment also accommodates significant levels of daily residential, agricultural, commuter, school-related and commercial movement and is highly sensitive to prolonged trenching works, road-opening activity, groundwater disturbance, construction disruption, visual impacts and cumulative infrastructure intensification.

The proposed development would introduce substantial and permanent electrical infrastructure into a rural landscape and community setting already subject to increasing strategic infrastructure pressure associated with the wider Cashla Peaker Project, including gas infrastructure, electrical infrastructure and associated operational development.

1.2 Relationship to the Wider Cashla Peaker Project

The proposed substation and grid connection infrastructure are functionally, physically and operationally linked to the wider Cashla Peaker Project (ACP Ref: 324113) and cannot reasonably be considered standalone infrastructure.

The proposed development forms part of a wider integrated energy infrastructure project comprising the proposed gas-fired generating station, associated gas infrastructure and AGI

works, the proposed 220kV substation, underground grid connection infrastructure and associated construction, access and operational infrastructure.

The proposed 220kV substation, telecommunications mast and underground cable corridor have no independent operational purpose separate from the proposed generating station and associated infrastructure.

The Concern Group submits that the separation of interconnected infrastructure into multiple consent processes risks preventing a complete and transparent assessment of cumulative environmental effects, construction and traffic impacts, groundwater and hydrogeological risks, landscape and visual impacts, residential and community impacts and the wider industrialisation effects arising from the overall project.

Residents, road users and the receiving environment would experience the practical effects of a single integrated infrastructure project rather than separate isolated developments.

The submission further raises significant concerns regarding the practical deliverability of the proposed underground cable corridor having regard to cumulative infrastructure interaction, unresolved separation distances, shared corridor occupation, bridge constraints and prolonged traffic management requirements.

Accordingly, the proposed development must be assessed in the context of the wider integrated Cashla Peaker Project and associated infrastructure rather than as isolated standalone development.

1.3 Scope of Submission

This submission addresses the principal planning, environmental and legal concerns arising from the proposed development, including project fragmentation and cumulative assessment; groundwater and hydrogeological impacts; construction, traffic and road infrastructure impacts; biodiversity, ecological and heritage impacts; landscape, visual and lighting impacts; residential amenity and community impacts; strategic utility infrastructure and procedural planning issues; proportionality and long-term infrastructure burden concerns; and compliance with national and European planning and environmental law.

The submission should be read as a single integrated document, as many of the concerns identified are interconnected, cumulative and cross-cutting in nature.

2 Project fragmentation and integrated assessment

2.1 Introduction

The Concern Group submits that the proposed substation and grid connection infrastructure cannot reasonably be considered standalone development and must instead be assessed as integral and interdependent components of the wider Cashla Peaker Project.

The applicant's own Environmental Impact Assessment documentation expressly characterises the wider Cashla Peaker Project as a "single, combined project" comprising the generating station, gas infrastructure, substation and underground grid connection infrastructure.

The Concern Group respectfully submits that this further demonstrates that the proposed substation, telecommunications mast and underground cable infrastructure cannot reasonably be assessed as standalone utility infrastructure independent of ACP Ref. 324113.

The proposed development is functionally, physically and operationally linked to:

- the proposed gas-fired generating station (ACP Ref: 324113);
- associated gas infrastructure and AGI works;
- electrical transmission infrastructure;
- and associated construction and operational activities.

The proposed infrastructure appears to have no independent function separate from the wider Cashla Peaker Project and exists solely to facilitate the operation and connection of the proposed generating station. The proposed substation compound, telecommunications mast and underground cable infrastructure exist solely to facilitate operation of ACP Ref. 324113 and cannot reasonably be characterised as standalone utility development.

The Concern Group further notes that the applicant's own Civil Engineering Report expressly states that:

"Notwithstanding the dual consenting approach, the developments constitute a single, integrated project."

Accordingly, the Concern Group submits that the proposed development forms part of a single integrated project for the purposes of Environmental Impact Assessment and proper planning assessment.

2.2 Project Fragmentation Concerns

The Concern Group is concerned that the separation of interconnected infrastructure into multiple consent applications risks preventing a complete, transparent and integrated assessment of the cumulative environmental effects arising from the wider Cashla Peaker Project.

The proposed generating station, gas infrastructure, AGI works, 220kV substation and underground grid connection infrastructure are interdependent components of a single integrated infrastructure project. The separation of these elements across multiple consent processes creates a significant risk that the full environmental effects of the overall project are not assessed in a coordinated and cumulative manner.

Substantial overlap exists between the applications in relation to construction activity, traffic generation, environmental impacts, operational infrastructure and cumulative interaction within the receiving environment. Residents, road users and the wider environment would experience the practical effects of a single integrated infrastructure project rather than separate isolated developments.

Particular concern arises regarding the interaction between the proposed underground cable corridor and other strategic infrastructure proposals affecting the same receiving environment. The applicant's own Technical Note confirms that approximately 2.2 km of the proposed underground cable corridor would share sections of the L7108 corridor with the proposed Gannow Wind Farm 38kV grid connection project (Galway County Council Ref. 2561412; ABP Ref. PL07.500493). The Technical Note further confirms that final horizontal separation distances between the respective cable systems remain subject to detailed design confirmation.

The Concern Group submits that this demonstrates that significant aspects of cumulative infrastructure interaction, corridor occupation and long-term infrastructure configuration remain unresolved at the current stage of assessment.

The cumulative interaction between the generating station, gas infrastructure, substation, telecommunications mast and underground cable infrastructure may give rise to environmental effects materially greater than those assessed within each individual application considered separately. These include cumulative construction impacts, traffic and road infrastructure effects, groundwater and hydrological impacts, landscape and visual effects, archaeological impacts and long-term industrialisation effects affecting the wider receiving environment.

The applicant's own documentation states that the submission of separate planning applications arises "solely from planning legislation requirements" while repeatedly acknowledging the integrated and interdependent nature of the wider project. The Concern Group respectfully submits that this confirms that the proposed generating station, substation and underground

grid connection infrastructure are not independent developments, but constituent elements of one overall infrastructure project.

Accordingly, the Concern Group submits that the proposed development must be assessed within the context of the wider integrated Cashla Peaker Project and associated infrastructure and that the cumulative environmental effects of the combined project require coordinated and integrated assessment.

2.3 Subsequent Information Relevant to the Wider Project Assessment

The Concern Group notes that certain information now available through the EIAR and supporting documentation accompanying Application Ref. 324162 was not fully available, clearly identifiable or capable of comprehensive assessment at the time the Concern Group prepared its submission in relation to Application Ref. 324113.

The documentation accompanying ACP Ref. 324162 materially expands the understanding of the scale, intensity and cumulative infrastructure implications associated with the wider Cashla Peaker Project. In particular, the documentation provides substantially greater detail regarding the extent of the proposed 8.1 km underground cable corridor, trenching and HDD works, road-opening activity, permanent above-ground infrastructure, archaeological interaction and cumulative infrastructure impacts arising across multiple rural townlands.

The Concern Group is also concerned that the scale, configuration and cumulative implications of the proposed infrastructure appear to have materially evolved between the pre-application consultation stage, the Inspector's pre-application report, and the final EIAR documentation submitted with the application. The level of technical detail, extent of construction activity, cumulative infrastructure interaction, and long-term infrastructure burden now apparent within the final application documentation significantly exceeds what many affected residents and members of the public could reasonably have understood during earlier stages of the project and public consultation process.

Of particular significance is the extent of interaction identified between the proposed cable corridor and archaeological notification zones, recorded monuments, vernacular heritage features and established rural landscape character throughout Rathmorrissey, Castlelambert, Moanbaun and surrounding townlands. The documentation further confirms substantial reliance on construction-stage archaeological monitoring and mitigation measures together with a relatively limited level of investigative trenching along sections of the route corridor.

The documentation also materially expands the understanding of cumulative interaction between the proposed substation, telecommunications mast, underground cable infrastructure and associated energy infrastructure affecting the wider receiving environment.

The Concern Group further submits that insufficient information has been provided regarding the comparative assessment of alternative route alignments, construction methodologies and reduced-impact infrastructure options capable of minimising disturbance to established residential properties, rural roads, agricultural landholdings and sensitive receiving environments along the proposed cable corridor.

The Concern Group submits that this additional information significantly alters the understanding of the scale, extent and cumulative implications of the overall project and further reinforces concerns regarding project fragmentation, cumulative environmental assessment, archaeological sensitivity and progressive industrialisation of the rural receiving environment.

The Concern Group respectfully submits that the proposed generating station, substation, underground cable infrastructure and associated works comprise interdependent elements of a single integrated strategic infrastructure project and that observations, concerns and environmental assessment issues arising within either application are materially relevant to the assessment of the wider project as a whole.

Accordingly, the Concern Group respectfully requests that An Coimisiún Pleanála consider the cumulative implications of the combined infrastructure proposals and the extent to which the information now available through Application Ref. 324162 provides additional context and detail relevant to matters previously raised in relation to ACP Ref. 324113.

2.4 Integrated Environmental Assessment

The Concern Group respectfully submits that the EIAR and supporting documentation do not adequately assess the proposed development within the context of the wider integrated Cashla Peaker Project and associated infrastructure.

The cumulative environmental footprint arising from the combined operation of the generating station, substation, telecommunications mast and underground cable infrastructure materially exceeds the impacts assessed within either application considered independently.

The Concern Group further submits that the proposed underground cable corridor and associated linear infrastructure appear to have been subject to a materially lower level of route-specific assessment and baseline scrutiny than the principal generating station site, notwithstanding the extensive geographical spread of the proposed works and their direct interaction with residential properties, rural roads, agricultural landholdings, ecological corridors and groundwater-sensitive environments throughout the receiving environment.

Particular concern arises regarding the adequacy of cumulative and in-combination assessment, the interaction between overlapping construction activities, the combined effects of trenching

and road-opening works, cumulative impacts on groundwater, roads, biodiversity and residential amenity and the long-term industrialisation effects arising from the overall project.

The Concern Group submits that the separation of interconnected infrastructure into multiple consent applications risks undermining the objectives of the Environmental Impact Assessment process by preventing a complete evaluation of the likely significant environmental effects of the project as a whole.

The Concern Group further submits that the presentation of the proposed generating station, substation, telecommunications mast, underground cable infrastructure and associated works across separate but interdependent applications risks creating an artificially reduced understanding of the overall scale, intensity, duration and cumulative environmental burden of the wider integrated Cashla Peaker Project within the receiving environment.

2.5 Conclusion

The Concern Group respectfully submits that ACP Ref. 324113 and ACP Ref. 324162 comprise interdependent components of a single integrated infrastructure project and cannot reasonably be assessed as isolated standalone developments.

The proposed substation, telecommunications mast and underground grid connection infrastructure have no meaningful standalone purpose separate from the proposed Cashla Peaker Plant and should therefore be assessed cumulatively as part of the overall project.

The Concern Group further submits that the separation of the generating station and associated grid infrastructure into separate planning applications creates significant difficulty in ensuring transparent cumulative assessment, coherent public participation and integrated planning evaluation.

The cumulative effect of project fragmentation, deferred design detail, unresolved infrastructure coordination and additional information now available through ACP Ref. 324162 materially limits the ability of the public and An Coimisiún Pleanála to fully assess the likely significant environmental effects of the wider integrated project at the current stage of determination.

Accordingly, the Concern Group respectfully submits that the cumulative environmental, infrastructural, residential, traffic, ecological, hydrogeological, landscape and planning implications arising from both applications require coordinated and transparent assessment having regard to the requirements of proper planning and sustainable development.

3 Alternatives Assessment, Site Selection and Route Selection

3.1 Introduction

This chapter addresses the alternatives assessment, site selection and route selection process associated with the proposed Cashla Peaker Project underground grid connection infrastructure, as described within the EIAR and associated application documentation.

The Concern Group notes that Chapter 3 of the EIAR Volume 2 sets out the reasonable alternatives considered for the Proposed Project. The chapter addresses alternatives across five areas: Site Location, Operational Features, Grid Connection (including technology), Transportation of Exceptional Abnormal Loads, and Alternative Designs and Construction Methodologies. The Concern Group respectfully submits that, notwithstanding the breadth of this framework, the assessment as presented is deficient in a number of material respects, particularly as regards the grid connection, substation selection and route corridor assessment.

The Concern Group respectfully submits that insufficient information has been provided regarding the identification, assessment and comparative evaluation of:

- alternative route corridors;
- alternative substation locations;
- alternative infrastructure configurations; and
- alternative construction approaches for the proposed 220kV underground cable connection between the proposed onsite substation at Rathmorrissy and the existing Cashla substation.

Given the scale of the proposed development, the sensitivity of the receiving environment and the extent of potential impacts arising from trenching, road-opening and associated infrastructure works, the Concern Group respectfully submits that a robust and transparent alternatives assessment is essential.

Particular concern arises regarding the extent to which the selected route traverses constrained rural roads and established rural-residential communities characterised by ribbon development, residential occupation, agricultural activity, commuter-related traffic movement, local business operations, groundwater sensitivity, and limited alternative access arrangements.

The Concern Group further submits that the alternatives assessment process appears to place significant emphasis upon engineering feasibility, constructability and strategic infrastructure considerations while insufficiently assessing:

- residential and community impacts;
- cumulative infrastructure occupation;
- cumulative construction disruption;

- traffic and access disruption;
- long-term road infrastructure implications;
- geological and groundwater sensitivity; and
- cumulative interaction with other proposed infrastructure projects affecting the same road network.

Accordingly, the Concern Group respectfully submits that the EIAR does not adequately demonstrate that the selected underground cable corridor represents the least environmentally damaging, least disruptive or most appropriate route option available.

3.2 Infrastructure-Led Site and Substation Selection

3.2.1 EIA Directive Framework Acknowledged but Not Met

Section 3.1 of EIAR Volume 2, Chapter 3 (p.141) confirms that the alternatives assessment is framed by the requirements of Article 5(1)(d) of Directive 2011/92/EU as amended by Directive 2014/52/EU.

The EIAR states that the chapter '*describes the reasonable alternatives considered and the main reasons for the selection of the Proposed Project taking into account the effects on the environment.*'

Source : EIAR Volume 2, Chapter 3, Section 3.1, p.141,

The Concern Group notes that the EPA (2022) guidelines are cited within the EIAR as the basis for the alternative's framework, with the EIAR stating it is '*generally sufficient to provide a broad description of each main alternative and the key issues associated with each.*'

The Concern Group respectfully submits that, while reliance on this EPA guidance is acknowledged, it does not diminish the requirement under the **EIA Directive** for a clear, reasoned and comparative assessment of alternatives where those alternatives are identified. In this regard, **the Court of Justice of the European Union** has confirmed in *Holohan v An Bord Pleanála* and *Commission v Ireland* that the assessment of alternatives must be sufficiently detailed, reasoned and evidence-based to enable the competent authority to carry out a fully informed assessment.

3.2.2 Site Selection — Infrastructure-Led from the Outset

Section 3.3 of EIAR Volume 2 (Site Location and Alternatives, p.142) confirms explicitly that site selection was driven by infrastructure availability rather than environmental suitability. The EIAR states:

"The Peaker Plant requires a connection to an existing gas supply. This limits site selection to areas within the vicinity of an existing gas pipeline... Site selection was therefore also limited to sites within the vicinity of a substation connection. The location for the Peaker Plant was primarily selected because there is an intersection of the existing gas transmission lines and electricity grid infrastructure."

Source : EIAR Volume 2, Section 3.3.1, p.142

Section 3.3.1 further confirms that the Mayo–Galway pipeline (BGE/85), commissioned in 2006, was the determining factor. The EIAR states: *'The transportation of exceptional abnormal loads via a suitable Port was also a consideration by BGE.'* Four zones east of Galway City were then identified (p.144–145):

- North of Carrowmoneash on Station Road (N67);
- A larger area covering Carnmore and Lissarulla, north of the M6 and extending west to Cashla on the R339;
- East of Ballymoneen (Clare By) at Grange East north of the R339; and
- Along the M6 motorway north-east of Derrydonnell North as far east as the M6/M18 interchange.

Source : EIAR Volume 2, Section 3.3.1, pp.144–145, Figure 3-3

Within these zones, clusters of potential sites were identified at Deerpark Industrial Estate (Oranmore), between Galway Airport and Cashla, Ballymoneen, Barretspark/Knocknacreeva, and Carraunduff/Pollnagroagh (p.145). Section 3.3.1.2 (Selected Site Option, p.147) states:

"BGE determined that the Proposed Project (Figure 3-4) was the best performing site option, specifically due to the intersection of the existing gas transmission lines and electricity grid infrastructure, land availability and lack of significant environmental constraints."

Source : EIAR Volume 2, Section 3.3.1.2, p.147

The Concern Group respectfully submits that this is a significant admission. The selected site was chosen primarily because infrastructure was available there — not because it performed better on environmental or community grounds than other candidate sites. No comparative matrix, scoring table or ranked assessment of the specific candidate site clusters is provided. The EIAR does not explain on what basis Deerpark, Carnmore, Ballymoneen or the Barretspark cluster were eliminated relative to the selected site.

Furthermore, the constraints identified at Section 3.3.1.1 (p.146) — including limestone pavement, SAC proximity, COMAH facilities, and archaeological sensitivity — which were applied to exclude other zones, are themselves present at or in the vicinity of the selected site. The assessment does not demonstrate that these constraints were applied consistently across all candidate locations.

3.2.3 Substation Selection — Four Options, No Comparative Environmental Assessment

Section 3.5.2 of EIAR Volume 2 (Cashla Substation Connection, p.154) confirms that four 220kV substations were proposed to EirGrid for connection: Prospect, Naas, Dunstown and Cashla. The EIAR states:

"Prospect and Naas were rejected by EirGrid due to grid design considerations. Consultation with GNI recommended avoiding the lower half of the country because of natural gas supply constraints and therefore Dunstown was ruled out on that basis as a feasible alternative... there was a narrow band between Galway and Dublin where gas and electricity connections could be obtained."

Source : EIAR Volume 2, Section 3.5.2, p.154

The EIAR further confirms at Section 3.5.2 that *'a loop-in connection was avoided due to concern around EirGrid's ability to schedule outages to deliver the project to the required Capacity contract milestones.'* This demonstrates that Capacity Market delivery timelines were a material factor in substation selection — a commercial and programme consideration, not an environmental one.

Source : EIAR Volume 2, Section 3.5.2, p.154

The Concern Group respectfully submits that the elimination of Prospect, Naas and Dunstown was conducted entirely on grid design and gas supply grounds. No environmental comparison between the four substation locations is provided. No assessment of the relative community, residential or groundwater impacts of alternative substation connections is presented. The selection of Cashla was predetermined by infrastructure availability and Capacity Market constraints.

3.2.4 Onsite Substation — 2-Bay, 4-Bay and GIS Options

Section 3.5.1 of EIAR Volume 2 (Proposed Main Project Site Substation, pp.153–154) confirms that both 2-bay and 4-bay Air Insulated Switchgear (AIS) substations were primarily considered, with a Gas Insulated Switchgear (GIS) substation also given due consideration. The EIAR states:

"During consultation between BGE and EirGrid, a preference for the onsite construction of an 8-bay substation was identified by EirGrid. Following further consultation with EirGrid, it was agreed that a proposed 4-bay AIS substation orientated 90 degrees to allow for future extension to enhance both connectivity and grid reinforcement would be incorporated into the design."

Source : EIAR Volume 2, Section 3.5.1, pp.153–154

The Concern Group respectfully submits that this confirms the substation configuration was shaped by EirGrid's future grid reinforcement objectives rather than by environmental or community minimisation criteria. The 4-bay design was selected specifically to enable future expansion. This introduces the prospect of further infrastructure intensification at this location beyond the impacts currently assessed within the EIAR, and that future expansion has not been assessed.

3.3 Grid Connection Route Corridor Assessment — MCA Deficiencies

3.3.1 Technology Options — OHL Discounted on Landscape Grounds Alone

Section 3.5.3.1 of EIAR Volume 2 (Technology Options, p.154) confirms that the OHL option was considered but dismissed. The EIAR states:

"An OHL could be implemented which would reduce the installation cost both from construction and from the cost of the cables themselves... The OHL Option was not further explored due to the presence of a significant number of pre-existing OHL which in cumulation would have resulted in a congested landscape appearance."

Source : EIAR Volume 2, Section 3.5.3.1, p.154

The Concern Group notes that landscape appearance was the stated basis for dismissing the OHL option without further exploration. No assessment was provided of whether an OHL route could have avoided the most constrained sections of the L7108 and L7109 corridors and thereby reduced the community, residential and groundwater impacts associated with prolonged trenching in established rural communities.

3.3.2 Seven Routes Assessed — MCA Findings

Section 3.5.3.2 of EIAR Volume 2 (Cable Route Corridor Options, p.154) confirms that seven potential grid route corridors were identified: six underground cable options (UGC_1 to UGC_5 and a combined UGC_7) and one overhead line option (OHL_6). A Multi-Criteria Analysis (MCA) was carried out by TLI and AtkinsRéalis for all seven options, aligned with the EirGrid (2021) Framework for Grid Development Multi-Criteria Analysis Guidelines, based on five key criteria: Technical Factors, Economic Factors, Deliverability Factors, Environment Factors, and Socio-Economic Factors.

The full MCA scoring as set out in Table 3-1 of the EIAR (p.156) is reproduced below:

Route Option	Technical	Economic	Deliverability	Environment	Socio-Economic	Benchmarked Score
Pink — UGC_1 (Selected)	Med-High	Medium	Medium	Med-High	Most Preferable	Med-High
Orange — UGC_2	Med-High	Med-High	Med-High	Med-High	Most Preferable	Med-High
Blue — UGC_3	Med-High	Medium	Medium	Med-High	Most Preferable	Med-High
Yellow — UGC_4	Med-High	Med-High	Med-High	Med-High	Most Preferable	Med-High
Green — UGC_5	Med-High	Med-High	Med-High	Med-High	Most Preferable	Med-High
Red — OHL_6	Med-High	Medium	Medium	Med-High	Most Preferable	Medium
Combined Green + Orange — UGC_7	Most Preferable	Med-High	Med-High	Med-High	Most Preferable	Med-High

Source: EIAR Volume 2, Table 3-1 — MCA Scoring for Grid Route Options and Technology, p.156, Main EIAR_rev7 Final, 0114485DG0005

The EIAR's own commentary on the MCA results (pp.156–157) confirms the following:

- Technical performance: *'there was very little difference between the route options with 6 no. routes scoring Medium-High preference. However, Route 7 was the most preferable technically.'*
- Economic performance: UGC_1 scored only Medium preference — below UGC_2, UGC_4, UGC_5 and UGC_7.
- Deliverability performance: UGC_1 scored only Medium preference — below UGC_2, UGC_4, UGC_5 and UGC_7. *'The number of wayleaves required was a key differentiator between options.'*
- Environmental performance: *'all options were ranked as Medium-High preference overall with few constraints identified to differentiate between the options.'* Karst features and groundwater vulnerability were identified as potential constraints but were scored equally across all six UGC routes.
- Socio-Economic performance: all options scored Most Preferable.

3.3.3 The Critical Admission — All Routes Broadly Comparable

The EIAR states at p.157 Section 3.5.3.2:

"In summary, the overall score for 6no. of the 7no. route options (UGC/OHL) comprised Medium-High preference, while 1no. route option (OHL 6) scored Medium preference. All 7no. route options scored Medium-High preference for Environmental Performance. Therefore, all route options (i.e. the selected preferred grid route option, UGC 1, and 6no. alternative route options) were broadly comparable, based on the above assessment criteria."

The EIAR then states the basis on which UGC_1 was selected:

"The preferred UGC route (UGC_1; pink line in Figure 3-5) was chosen as the preferred route as it utilised the existing road network, thereby minimising impacts to greenfield sites and landowners."

Source : EIAR Volume 2, Section 3.5.3.2, p.157

The Concern Group respectfully submits that these two statements, taken together, are determinative of the deficiency in the alternatives assessment. The EIAR confirms that all seven routes were broadly comparable on the MCA criteria applied. Despite this, UGC_1 was selected — not because it scored higher environmentally or on community grounds, but because it followed the existing road network and avoided greenfield land and wayleave requirements.

Critically, the MCA table confirms that UGC_1 scored lower than several alternatives on Economic and Deliverability criteria and was only equal to other routes on Environmental and Socio-Economic criteria. The combined option UGC_7 scored Most Preferable on Technical grounds and Medium-High across all other criteria — yet was not selected.

The Concern Group respectfully submits that the applicant's own MCA demonstrates that the selection of UGC_1 was driven by land access convenience and wayleave minimisation, not by superior environmental or community performance. The Concern Group further submits that the reliance upon existing road corridors as a principal route selection factor does not adequately account for the extensive interaction between the proposed works and constrained rural roads, adjoining private property, residential entrances, agricultural access arrangements and established rural community movement patterns throughout the receiving environment. This does not constitute a transparent, evidence-based demonstration that the selected route represents the least environmentally damaging or least disruptive option available.

3.3.4 Environmental Criterion — Karst and Groundwater Scored Equally, Not Investigated

The EIAR states at p.156 that for Environmental performance: *'Potential environmental constraints included potential for karst features to exist and the potential for groundwater vulnerability and impacts to groundwater bodies as well as impacts to lands, soils and geology. While environmental risk associated with these factors was lower for the OHL, the potential risk was comparable for all 6no. UGC routes.'*

Source: EIAR Volume 2, Table 3-1 commentary, p.156

The Concern Group respectfully submits that the equal scoring of all six UGC routes on Environmental criteria — despite the acknowledged presence of karst features and groundwater vulnerability along the selected route — demonstrates that these constraints were not adequately differentiated between route options. The applicant's own Construction Methodology report (Appendix 2.7) acknowledges that fissured or fractured rock conditions are **'considered unsuitable for HDD'** and may cause **bentonite loss** during drilling operations. The selected route requires three HDD crossings beneath the M6 and M17 motorways in a receiving environment characterised by shallow limestone bedrock (0.7–1.3m depth confirmed in the Foundation Note) and a karstified conduit aquifer classified as Extreme to High vulnerability.

The fact that all six UGC routes received identical Environmental scores in the MCA does not establish that karst and groundwater constraints were equivalent across all corridors — it demonstrates only that the MCA methodology was insufficiently granular to differentiate between routes on environmental grounds. This is a material deficiency in the assessment.

3.4 Residential and Community Sensitivity of the Selected Route

The selected underground cable corridor (UGC_1) traverses an established mixed rural-residential environment extending through Rathmorrissey, Pollnagroagh, Moanbaun, Castlelambert, Knocknacreeva, Caraunduff, Caherbriskaun, Lisheenkyle East, Barrettspark and Cashla.

The Concern Group respectfully submits that insufficient regard has been given to the extent to which the selected route passes through settled rural communities characterised by ribbon development, residential occupation, commuter-related traffic movement associated with the Galway fringe and Athenry commuter belt, agricultural activity, school-related traffic, local business operations, vulnerable groundwater conditions and constrained rural roads with limited alternative access arrangements.

The affected road network facilitates:

- residential and school access;

- commuter traffic associated with the wider Galway and Athenry commuter catchment;
- agricultural machinery, livestock movement and milk collection activity;
- emergency service access, carers and home-support services; and
- commercial traffic associated with Coffey Construction, Tribal Foods / Heneghan's Nursery, Ryantown Toys, Avrame, Creva Agri, C&F Tooling, and Cashla Quarries.

The affected road network also facilitates pedestrian, walking, cycling and recreational use which may experience prolonged disruption during periods of road closure and traffic management operation.

The EIAR's own MCA confirms that Socio-Economic performance scored Most Preferable for all route options — including alternatives that may not have traversed the same settled residential and agricultural communities. The Concern Group respectfully submits that the equal Socio-Economic scoring of all seven routes does not withstand scrutiny when UGC_1 specifically traverses the most established and constrained community corridors in the study area.

Particular concern arises regarding the selection of sections of the L7108 and L7109 corridors for prolonged trenching, road-opening and joint bay installation works. The Concern Group further notes the relevance of **Chapter 4 (Rural Living and Development) of the Galway County Development Plan 2022–2028**, which recognises the importance of protecting residential amenity and supporting sustainable rural communities within evolving commuter-influenced settlement areas.

Accordingly, the Concern Group respectfully submits that the selected route corridor traverses a materially more sensitive receiving environment than the MCA scoring reflects, and that the likely cumulative residential, agricultural and community impacts have been materially underestimated.

3.5 Cumulative Infrastructure and Corridor Impacts

3.5.1 Gannow Wind Farm Grid Connection — Applicant's Own Concession

The applicant's own documentation — TLI Group Technical Note 03, Gannow Wind Farm Grid Connection Review (Appendix 16.2, Volume 3, January 2026) — confirms that both the proposed 220kV UGC Grid Connection and the 38kV Gannow Route Option converge on the L7103 and share the L7108 corridor for approximately 2.2km. The Technical Note states:

"The cumulative impact for this local road section will result in 2 Nr. 220kV circuit Joint Bays being encountered... Both options, proposed 220 kV UGC Grid Connection & 38kV Gannow Route Option circuits do converse on different grid alignments, to avoid and navigate the

Motorway crossings respectively. These circuits will converge again, within the L-7109, approximately 850m south of the Cashla 220kV/110kV substation node."

Source: TLI Group Technical Note 03 — Gannow Wind Farm Grid Connection Review, Appendix 16.2, Volume 3 of EIAR, January 2026, Job No. 300-101269

The NTS (Volume 1, AtkinsRéalis, February 2026) further confirms:

"The cumulative impact assessment indicates that the Proposed Project and a proposed development, referred to as Gannow Windfarm (Ref: 25/61412; Refused, currently under appeal to An Coimisiún Pleanála) will result in short-term, significant impacts on the local road network, specifically along L-7108 and L-7109, due to full road closures during grid connection works."

Source: NTS Volume 1, Section 16, Cashla Peaker Plant EIAR, 0114485DG0036, February 2026, AtkinsRéalis

The Concern Group respectfully submits that the applicant's own documentation therefore concedes short-term significant cumulative impacts on L7108 and L7109. This is a material concession. It demonstrates that the route selection process did not give adequate weight to cumulative corridor occupation. Both applications are for consideration concurrently before An Coimisiún Pleanála, and this cumulative context is directly relevant to the assessment of route selection adequacy.

3.5.2 Construction Methodology Confirms Extent of Disruption

The Construction Methodology Report (Vol. 3, Appendix 2.7, TLI Group / AtkinsRéalis, January 2026) confirms that:

- the UGC route is approximately 8km in length, with 6,050m on public road and 1,662m on third party lands;
- three HDD operations are required beneath the M6 and M17 motorways;
- multiple permanent joint bays are proposed within narrow local roads;
- a 22-tonne rock breaker may be required in sections with shallow bedrock; and
- passing bays may require construction to facilitate construction access and traffic management.

Source: Vol. 3 Appendix 2.7 — Grid Connection for Athenry Gas Peaker Plant — Construction Methodology, Tables 1 and 2, 300101269-R02-04, TLI Group / AtkinsRéalis, January 2026

The Concern Group further notes that aspects of the final cable alignment remain subject to modification following further assessment and detailed design work, as confirmed at Section 2.0 of the Construction Methodology Report. This introduces additional uncertainty regarding

the final extent of construction impacts, utility interactions, and community disruption at the time of determination.

3.6 Geological and Groundwater Constraints — Inadequately Differentiated in MCA

As noted above, the MCA Environmental scoring treated all six UGC routes as equivalent despite the acknowledged presence of karst features and groundwater vulnerability. The Concern Group submits that this equal scoring conceals a material failure to investigate whether alternative routes offered materially lower geological risk.

The Construction Methodology Report acknowledges:

"A number of geologies are considered unsuitable for HDD because they increase the chances of bentonite being lost and eventually breaking up through the overburden soils. A standard example is fissured or fractured rock."

Source: Vol. 3 Appendix 2.7, Section 11.1.3, p.32

The EIAR's own MCA commentary (p.156) acknowledges karst features and groundwater vulnerability as potential environmental constraints along the route corridors. Yet all six UGC routes received identical Environmental scores. The Concern Group respectfully submits that if karst and groundwater vulnerability genuinely varied between corridors — as the receiving environment data would suggest — then the equal scoring indicates either that the assessment was insufficiently granular to capture these differences, or that the MCA was not designed to differentiate on these grounds. Either conclusion represents a deficiency.

3.7 Long-Term Infrastructure Burden

The Concern Group respectfully submits that insufficient consideration has been given to the long-term implications associated with the permanent installation of major underground electrical infrastructure within constrained rural roads and evolving rural-residential communities.

The EIAR confirms that the 4-bay AIS substation was designed to allow for future extension, and that EirGrid identified a preference for an 8-bay arrangement during consultation. This design intent — confirmed at Section 3.5.1 (p.153–154) — demonstrates that the proposed development has been shaped by future grid reinforcement objectives extending beyond the currently assessed scheme. Future expansion of the substation and associated infrastructure requirements have not been assessed within the EIAR.

The affected townlands comprise an evolving rural-residential environment experiencing ongoing commuter-related development pressure within the wider Galway fringe and Athenry area. Long-term implications include:

- future maintenance access requirements within constrained rural roads;
- future infrastructure upgrade implications associated with grid reinforcement;
- cumulative underground infrastructure congestion as further utility works are undertaken;
- future interaction with other underground utilities including water mains, drainage and telecoms; and
- long-term road network resilience and flexibility for future residential and agricultural access requirements.

The EIAR improperly treats the underground cable corridor primarily as temporary construction infrastructure while insufficiently assessing the permanent long-term infrastructure burden associated with retaining substantial underground electrical infrastructure within constrained local roads.

Accordingly, the Concern Group respectfully submits that insufficient consideration has been given to the long-term strategic implications associated with concentrating major electricity transmission infrastructure within constrained rural roads serving established residential and agricultural communities.

3.8 Conclusion

The Concern Group respectfully submits that the EIAR does not adequately demonstrate that the selected underground cable corridor (UGC_1) represents the least environmentally damaging, least disruptive or most appropriate route option available within the receiving environment.

The following specific and evidenced deficiencies have been identified, each supported by reference to the applicant's own documentation:

- Site selection was explicitly infrastructure-led from the outset. The EIAR confirms at Section 3.3.1 (p.142) that the site was selected 'primarily' due to the intersection of gas transmission and electricity grid infrastructure. No comparative matrix of candidate site clusters is provided.
- The constraints applied to exclude alternative sites — including limestone pavement, COMAH proximity, and SAC adjacency — are also present at the selected site, yet were not applied with equivalent scrutiny. This inconsistency is confirmed across Sections 3.3.1.1 (p.146) and 3.3.1.2 (p.147).

- Substation selection was conducted on grid design and Capacity Market grounds alone. The elimination of Prospect, Naas and Dunstown (Section 3.5.2, p.154) involved no comparative environmental assessment.
- The MCA confirms all seven route options were broadly comparable (EIAR Volume 2, p.157). UGC_1 was selected on road-use convenience grounds, not environmental or community superiority. UGC_1 scored lower than several alternatives on Economic and Deliverability criteria.
- The combined route UGC_7 scored Most Preferable on Technical criteria and Medium-High across all other criteria — yet was not selected. No explanation is provided for preferring UGC_1 over UGC_7.
- Environmental scoring treated all six UGC routes as equivalent on karst and groundwater grounds, despite acknowledged constraints along the selected corridor. This is insufficient differentiation.
- The applicant's own TLI Technical Note 03 concedes short-term significant cumulative road impacts on L7108 and L7109 arising from interaction with the Gannow Wind Farm grid connection.
- The 4-bay substation was designed for future expansion to 8 bays at EirGrid's request (Section 3.5.1, pp.153–154). This future intensification has not been assessed within the EIAR.
- Aspects of the final cable alignment remain unresolved at the time of application (Construction Methodology Report, Section 2.0), introducing uncertainty regarding the final extent of impacts at the time of determination.

The Concern Group further submits that the absence of a sufficiently robust and transparent alternatives assessment materially limits the ability of An Coimisiún Pleanála to fully assess the environmental effects of the proposed development, the cumulative implications associated with the selected route, and the compatibility of the proposed development with proper planning and sustainable development.

In these circumstances and having regard to the requirements of **Article 5(1)(d) of the Environmental Impact Assessment Directive** and the principles established in *Holohan v An Bord Pleanála* and *Commission v Ireland*, the Concern Group respectfully submits that significant uncertainty remains regarding whether the proposed development represents the most appropriate, proportionate or environmentally acceptable option within this sensitive rural receiving environment.

4 Traffic, Construction and Road Infrastructure

4.1 Introduction

This chapter addresses the Traffic and Transport assessment contained within Chapter 10 of the EIAR for the proposed Cashla Peaker Project and associated 220kV underground grid connection infrastructure (An Coimisiún Pleanála Case Reference: 324162).

The Concern Group respectfully submits that the EIAR materially underestimates the likely traffic, transport, construction and community impacts arising from the proposed underground cable corridor and associated infrastructure works.

The proposed development comprises a substantial linear infrastructure project extending through the townlands of Rathmorrissy, Pollnagroagh, Moanbaun, Castlelambert, Knocknacreeva, Caraunduff, Caherbriskaun, Lisheenkyle East, Barrettspark and Cashla, connecting the proposed onsite 220kV substation within the Peaker Plant site to the existing 220kV Cashla substation.

The EIAR places significant reliance upon phased trenching operations, temporary traffic management arrangements and sequential road closures while materially underestimating the cumulative and prolonged disruption likely to arise within the receiving environment. Particular concern arises regarding the practical implications of prolonged construction activity occurring within constrained rural roads serving established residential, agricultural and commercial communities.

The Concern Group further submits that insufficient regard has been given to:

- repeated excavation and reinstatement operations;
- prolonged occupation of constrained rural roads;
- full and partial road closures;
- stop/go traffic management systems;
- substantial excavation and rock-breaking activity;
- and cumulative interaction with other infrastructure proposals affecting sections of the same road network.

Particular concern also arises regarding the cumulative interaction between the proposed underground cable corridor and the proposed Gannow Wind Farm grid connection project (Galway County Council Ref. 2561412; ACP Ref. PL07.500493), which would affect sections of the same constrained local road network, including the L7108 and L7109 corridors.

This chapter therefore addresses:

- the adequacy of the Traffic and Transport assessment methodology;
- baseline traffic assumptions and the complete absence of survey information for the L7108 and L7109;

- construction traffic and road closure impacts, including the aggregate consolidated closure programme;
- traffic management, emergency access and the mutual dependency of the proposed diversion arrangements;
- pavement integrity, reinstatement concerns and unresolved structural safety matters at Castlelambert Overbridge;
- rock-breaking in proximity to a live high-pressure gas transmission main;
- cumulative impacts and monitoring proposals;
- decommissioning and long-term infrastructure implications;
- and the overall conclusions of the EIAR Traffic and Transport assessment.

Accordingly, the Concern Group respectfully submits that the likely traffic, transport and cumulative community impacts associated with the proposed development have been materially underestimated within the EIAR.

4.2 Existing Receiving Environment

The Concern Group respectfully submits that the receiving environment traversed by the proposed underground cable corridor has not been adequately characterised within the EIAR.

The affected road network comprises an established and intensively occupied mixed rural-residential environment extending through Rathmorrissy, Pollnagroagh, Moanbaun, Castlelambert, Knocknacreeva, Caraunduff, Caherbriskaun, Lisheenkyle East, Barrettspark and Cashla. The affected area cannot reasonably be characterised as an isolated or sparsely populated rural landscape.

Rather, the receiving environment is characterised by:

- established ribbon development;
- high levels of residential occupation;
- commuter-related traffic movement associated with the wider Galway fringe and Athenry commuter belt;
- agricultural activity and farm access requirements;
- school-related traffic;
- local business and employment-generating activity;
- constrained carriageway widths;
- and limited alternative access arrangements.

Particular regard should be had to the extent of ribbon development along sections of the affected road network where residential properties, agricultural entrances and local business access points are located in close proximity to the proposed underground cable corridor and associated construction works.

The affected roads experience regular:

- commuter traffic travelling toward Athenry, Galway City and surrounding employment centres;
- school-related traffic associated with Lisheenkyle National School, Presentation College Athenry and Coláiste an Chláirín;
- traffic associated with Athenry Golf Course;
- agricultural machinery and livestock transport;
- milk collection and agricultural servicing activity;
- carers and home-support services;
- emergency service access;
- and commercial traffic associated with
 - Coffey Construction, Tribal Foods / Heneghan's Nursery on L3103
 - Ryantown Toys, Avrame, Creva Agri on L7108
 - and C&F Tooling, and Cashla Quarries on L7109

The Concern Group respectfully submits that insufficient regard has been given within the EIAR to the extent to which the proposed underground cable corridor would traverse an established lived rural-residential environment characterised by significant levels of daily residential, agricultural, educational and commercial movement.

The Concern Group further notes the relevance of Chapter 4 (Rural Living and Development) of the Galway County Development Plan 2022–2028, which recognises the importance of supporting sustainable rural communities, protecting residential amenity and appropriately managing development impacts within evolving rural settlement patterns influenced by urban-generated growth pressures.

Accordingly, the Concern Group respectfully submits that the receiving environment is materially more sensitive to prolonged construction-related disruption than is reflected within the EIAR Traffic and Transport assessment.

4.2.1 Existing Traffic and Road-Safety Constraints within the L7109 / L7108 Corridor

The Concern Group further notes that the wider L7109 corridor adjoining the proposed development area has been the subject of longstanding planning, traffic and road-safety considerations associated with quarry-related development activity, including matters considered within Galway County Council planning permissions Ref. 09/1958 and 20/499 together with An Bord Pleanála proceedings including ABP Ref. 308549-20.

Planning and judicial review documentation associated with quarry operations adjoining the L7109 corridor reference traffic hazard concerns, constrained road conditions and road-safety interaction affecting users of the local road network.

The Concern Group respectfully submits that this established planning history demonstrates that the receiving environment within the L7109/L7108 corridor is already recognised as constrained and sensitive in terms of:

- rural road geometry;
- carriageway width;
- bridge interaction;
- pedestrian safety;
- school access;
- cyclist movement;
- and vehicle passing capacity.

Particular concern arises regarding sections of constrained carriageway and bridge infrastructure where vehicle passing opportunities are limited, pedestrian refuge space is limited or absent, verge conditions are constrained, visibility may be restricted and vulnerable road users including pedestrians, cyclists and schoolchildren may be exposed to elevated road-safety interaction during construction activity.



Figure 4.1. L7109- Photographic evidence demonstrating constrained road width, limited pedestrian refuge space and restricted vehicle passing conditions further illustrates the sensitivity of the receiving environment and the potential incompatibility of prolonged construction occupation within sections of the proposed route corridor.

The Concern Group further notes that restrictions and controls relating to certain heavy vehicle movements have previously applied within parts of the wider corridor, further indicating recognition of the constrained nature and limited carrying capacity of the receiving road environment.

The Concern Group respectfully submits that this is particularly relevant in the context of the proposed development, which would introduce prolonged construction-phase occupation of the local road corridor involving:

- trench excavation works;
- excavators and tracked plant;
- cable installation machinery;
- surfacing machinery;
- temporary traffic management infrastructure;
- construction worker vehicles;
- delivery vehicles;
- and associated construction activity over an extended duration.

Particular concern arises regarding the cumulative interaction between:

- trench excavation works;
- temporary road closures;
- construction plant and machinery;
- school traffic;
- agricultural traffic;
- commercial traffic;
- pedestrian and cyclist movement;
- local residential access;
- emergency vehicle access;
- and constrained bridge and carriageway geometry within the receiving environment.

The Concern Group respectfully submits that insufficient assessment appears to have been undertaken regarding the cumulative interaction effects arising from prolonged construction occupation of constrained sections of the L7109/L7108 corridor in combination with existing sensitivities associated with school access, pedestrian movement, rural road geometry and vulnerable road users.



Figure 4.2 – L7109, Barrettspark townland, before Cashla Substation

The Concern Group respectfully submits that the historical imposition of traffic-related controls and mitigation measures within the wider corridor further demonstrates that the local road network cannot reasonably be characterised as a standard rural receiving environment capable of absorbing prolonged construction occupation without significant interaction effects.

The above conditions must additionally be considered in the context of the applicant's own acknowledgment that:

“Due to limited road width along Lisheenkyle East (L7108) and L7109 roads, full road closures will be required.”

(EIAR Volume 2, Chapter 2, p.108)

The Concern Group respectfully submits that the proposed development introduces prolonged construction occupation into a receiving environment already characterised by acknowledged physical constraints, vulnerable road-user interaction and documented traffic-sensitivity considerations, warranting a significantly more precautionary and site-specific assessment than presently provided within the EIAR.



Figure 4.3 - This image shows cyclist and vehicle interaction on a constrained section of the L7108/L7109 corridor, highlighting the narrow carriageway, limited verge space and exposure of vulnerable road users.

4.3 Scale and Extent of the Proposed Construction Works

Chapter 10 of the EIAR confirms that the proposed underground cable corridor extends approximately 8.1 kilometres between the proposed substation site at Rathmorrissy and the existing Cashla substation. The proposed route traverses multiple constrained rural roads, including substantial sections of the L7108 and L7109 road network.

The EIAR confirms that the proposed development would require temporary road closures, stop/go traffic management systems, diversion routes, temporary junction restrictions, haulage and construction traffic activity, HDD launch and exit compounds, trench excavation and reinstatement operations, and prolonged construction activity extending over an approximate six-month period for the main cable installation alone.

The Concern Group further submits that the true aggregate closure burden should be assessed cumulatively, including main cable installation, resurfacing and commissioning closures. When these elements are considered together, the likely closure burden appears to be approximately 5.5 months on the L7108, approximately 3.9 months on the L7109 and approximately 2.2

months on the L3103. This consolidated closure burden has not been clearly presented within the EIAR in a single transparent assessment.

The Construction Methodology documentation confirms that the proposed works include:

- extensive underground cable trenching operations;
- horizontal directional drilling (HDD) beneath the M6 and M17 motorways;
- installation of permanent underground joint bay infrastructure;
- repeated excavation and reinstatement operations within the local road network;
- and prolonged occupation of constrained rural roads throughout the construction programme.

The Construction Methodology documentation further confirms that construction works will require up to 10 electrical and civil construction crews operating simultaneously; substantial excavation plant and construction machinery; tracked excavators; 22-tonne excavators equipped for rock-breaking operations; tracked dumpers; tractors and trailers; cranes; generators; and associated heavy construction equipment required for installation of the underground cable corridor.

Particular concern arises regarding the prolonged sequential nature of the proposed works, repeated excavation and reinstatement operations within constrained carriageway widths, installation of permanent underground joint bay infrastructure and the confirmed requirement for rock-breaking operations associated with shallow bedrock and karst limestone conditions throughout significant sections of the route corridor.

4.3.1 The Aggregate Closure Programme Has Never Been Presented to the Community or to An Coimisiún Pleanála in Consolidated Form

The Concern Group respectfully submits that the EIAR presents the road closure programme in a fragmented manner across multiple documents, such that the true aggregate period of disruption on each affected road has not been presented to An Coimisiún Pleanála or to the affected community in consolidated form.

The EIAR at Table 10-1 of Chapter 10 sets out road closure durations for main cable construction and resurfacing. A separate document — the Construction Methodology Report (Vol. 3, Appendix 2.7, Section 7.0.2) — separately confirms that road closures will additionally be required during the commissioning phase, in the following terms:

"Road closures for commissioning will be in the order of 2 weeks per Local Road and 2 weeks for the Regional Road."

This confirmation does not appear in Chapter 10 of the EIAR, in the Non-Technical Summary, or in any single summary document accessible to affected residents. When the commissioning closures confirmed by the applicant's own Construction Methodology Report are incorporated alongside the construction and resurfacing closures set out in Table 10-1, the aggregate road closure programme on each affected road is as follows:

Table 4.1: Aggregate Road Closure Programme

Road	Main Cable Construction	Resurfacing	Commissioning	Total Aggregate Closure Period
L7108 (Lisheenkyle East)	3 months	2 months	2 weeks	approximately 5.5 months
L7109	2 months	1.5 months	2 weeks	approximately 3.9 months
L3103	1 month	3 weeks	2 weeks	approximately 2.2 months

Source: EIAR Table 10-1; Construction Methodology Report Vol. 3, Appendix 2.7, Section 7.0.2

The Concern Group respectfully submits that these aggregate figures represent the realistic and foreseeable road closure programme that will be experienced by residents, agricultural users, businesses and road users throughout the receiving environment. The failure to present these figures in consolidated form within the EIAR prevents An Coimisiún Pleanála from properly assessing the cumulative disruption burden and prevents affected residents from understanding the true duration of impact on their access, daily lives and livelihoods.

The characterisation within the EIAR of the road closure impacts as temporary and short-term is irreconcilable with an aggregate closure programme of approximately 5.5 months on the L7108 alone. A road closure of that duration on a constrained rural road serving established residential, agricultural and commercial communities across multiple townlands is not a temporary or negligible event.

The Concern Group respectfully submits that the reliability of the EIAR's conclusions regarding traffic and transport effects is fundamentally dependent upon the adequacy of the baseline assessment and construction methodology. Significant deficiencies arise in this regard.

4.4 Adequacy of the EIAR Traffic and Transport Assessment Methodology

The Concern Group respectfully submits that the methodology and scope of the Traffic and Transport assessment contained within Chapter 10 of the EIAR are insufficiently robust having regard to the scale, duration and engineering intensity of the proposed underground cable corridor and associated infrastructure works.

While the EIAR acknowledges that sections of the affected road network would be subject to temporary road closures, phased traffic management measures and prolonged construction activity, insufficient assessment has been undertaken regarding the cumulative and recurring effect of these works on the receiving environment.

In particular, the EIAR does not provide sufficient route-specific assessment of traffic management arrangements, cumulative road occupation durations, repeated residential and business access restrictions, agricultural traffic interaction, school-related traffic impacts, emergency access resilience or detailed baseline traffic count information for the two roads most substantially affected by the proposed development — the L7108 and the L7109.

The EIAR places significant reliance upon phased trenching operations, sequential closures and stop/go traffic management systems without adequately demonstrating how the effectiveness of these measures would be maintained throughout the construction programme or how they would function in practice within constrained rural roads serving settled communities.

The Concern Group further submits that relevant information regarding road closures, resurfacing requirements, commissioning closures, diversion arrangements and traffic management assumptions appears to be dispersed across multiple EIAR chapters and appendices, rather than presented in one consolidated assessment. This fragmented presentation limits the ability of affected residents, road users and An Coimisiún Pleanála to understand the full cumulative duration and practical effect of the proposed road occupation.

The Concern Group respectfully submits that the reliability of the EIAR's conclusions regarding traffic and transport effects is fundamentally dependent upon the adequacy of the baseline assessment and construction methodology. Significant deficiencies arise in this regard.

4.4.1 The Traffic Baseline Is Confined to a Single Road on a Single Winter Day — The L7108 and L7109 Were Not Surveyed at All

The Concern Group respectfully submits that the baseline traffic assessment is fundamentally deficient in a respect that goes beyond general methodology. It is not a case of insufficient survey detail. It is a case of no survey at all for the two roads that will bear the greatest construction burden arising from the proposed development.

The EIAR confirms, at Section 10.1 of Chapter 10 and at Section 10 of the Non-Technical Summary, that the entirety of the baseline traffic data for this application was obtained from a single Automatic Traffic Counter (ATC) survey conducted on the L3103 at a location 50 metres east of the junction with Moanbaun, on one day only — 13 February 2025. The EIAR states:

"Baseline traffic data for the nearest local road, L3103, was obtained from an Automatic Traffic Counter (ATC) survey conducted 50 m east of the junction with Moanbaun on 13 February 2025."

The proposed underground cable corridor does not follow the L3103 for the majority of its length. The cable route traverses approximately 8.1 kilometres across multiple roads, the greater part of which runs along the L7108 (Lisheenkyle East Road) and the L7109 — the two roads subject to full closure for the longest durations in the entire construction programme. No traffic survey of any kind has been carried out on the L7108. No traffic survey of any kind has been carried out on the L7109. No traffic count data, peak period analysis, agricultural vehicle count, school traffic assessment or commuter profile has been collected for either road.

The Concern Group respectfully submits that this is not an omission of degree. It is a complete absence of baseline information for the two roads most substantially affected by the proposed development and subject to the longest periods of full road closure.

The single survey that has been conducted — on the L3103 on 13 February 2025 — is itself materially inadequate for an application of this nature. February is a period of reduced agricultural activity and represents one of the lowest traffic periods in the annual cycle for rural roads of this character. The survey does not capture:

- peak silage and harvest season traffic;
- peak livestock transport associated with Athenry (sheep sales Mondays, cattle sales Tuesdays, calf sales Thursdays);
- peak commuter and school traffic associated with Presentation College Athenry and Coláiste an Chláirín;
- seasonal variations in agricultural machinery use; or
- the particular characteristics of peak commuter periods on a road serving the wider Galway fringe and Athenry commuter belt.

The consequence of this absence of baseline data is that An Coimisiún Pleanála is being asked to assess the likely significant traffic and community effects of full road closures lasting up to five and a half months on roads for which no existing traffic volumes, peak period characteristics, seasonal variations or community usage patterns have been quantified. The assessment cannot demonstrate that the proposed works will not give rise to significant adverse effects on road users, residents, agricultural operations or businesses in the affected townlands, because it has not measured the baseline against which impact would be assessed.

Accordingly, the Concern Group respectfully submits that the absence of any traffic survey on the L7108 or the L7109 represents a fundamental failure of the baseline assessment, the consequences of which undermine the reliability of every subsequent traffic management, capacity, diversion and impact conclusion drawn in the EIAR for these roads.

4.4.2 A Community-Conducted Baseline Traffic Survey on the L7108

In the absence of any traffic survey conducted by the applicant on the L7108 or L7109, the Concern Group undertook its own baseline traffic survey on the L7108 at Castlambert (Eircode H65 WY26) on Friday, 15 May 2026. The survey was conducted using a fixed residential security camera facing the road which recorded all traffic movements over a 24-hour period (Appendix E). While individual vehicle registration numbers are not visible in the recorded footage, all vehicle types, movements and timings are clearly identifiable. The video record is retained and available for inspection by An Coimisiún Pleanála if required.

The survey date of Friday, 15th May 2026 represents a typical working weekday during a period of normal agricultural activity and is therefore considered more representative of prevailing traffic conditions within the receiving environment. The survey period captures commuter movement associated with the wider Galway fringe and Athenry commuter belt, school-related traffic, and the normal range of residential, commercial and agricultural activity characteristic of the affected rural road network.

The Concern Group further notes that this survey location at H65 WY26 within Castlambert does not appear to capture the full extent of agricultural and commercial traffic activity associated with the wider receiving environment. In particular, significant agricultural vehicle movement associated with a major dairy farming operation located towards the L3103 corridor would not appear to have been fully reflected within the survey location or survey period.

The Concern Group's survey was undertaken during a period that did not capture traffic patterns associated with peak silage-cutting, slurry-spreading or other seasonal agricultural operations and therefore may still underrepresent the actual agricultural traffic characteristics of the affected road network. The survey date also did not coincide with livestock sale activity associated with Athenry Mart and therefore may not reflect peak livestock transport movements characteristic of the wider rural road network.

The survey period also may not fully reflect peak operational traffic associated with existing commercial and industrial activity within the receiving environment, including vehicle movements associated with Ryantown Toys, Avrame, Creva Agri, C&F Tooling, and Cashla Quarries, together with the broader pattern of agricultural, commercial and commuter-related activity characteristic of the surrounding rural road network.

The Concern Group respectfully submits that this baseline survey provides An Coimisiún Pleanála with the first and only quantified traffic data for the L7108 corridor — the road subject to the longest aggregate closure period (approximately 5.5 months) in the entire construction

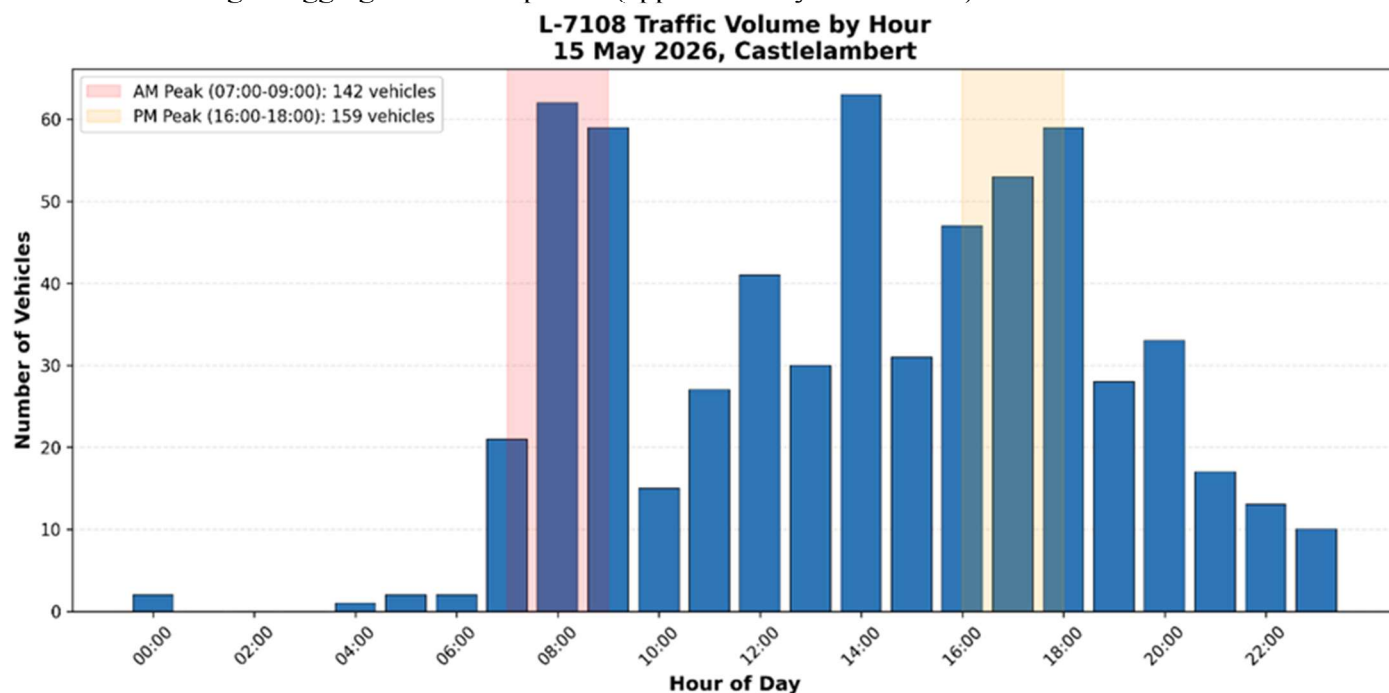


Figure 4.4: L7108 Traffic Volume by Hour — 15 May 2026

The survey identified clear peak traffic periods consistent with commuter, school and agricultural activity patterns

- Morning peak (07:00–09:00): 83 vehicles, including multiple school buses and commuter traffic
- Mid-morning activity (08:00–09:00): 62 vehicles in the single busiest hour
- Afternoon peak (14:00–15:00): 62 vehicles, coinciding with school collection times
- Evening peak (16:00–18:00): 94 vehicles over the two-hour period

Agricultural vehicle movements were recorded throughout the working day, with particular concentration during mid-morning and evening periods. The survey recorded 5 solo tractors, 10 tractors towing equipment, 11 jeeps towing trailers (livestock, silage equipment, farm machinery), and 1 milk collection lorry. This agricultural activity reflects the normal pattern of farming operations throughout the affected townlands. However, the survey date did not coincide with livestock sale activity at Athenry Mart, peak silage-cutting or slurry-spreading

periods, or other intensive seasonal farming operations, and therefore does not reflect peak agricultural traffic conditions within the receiving environment.

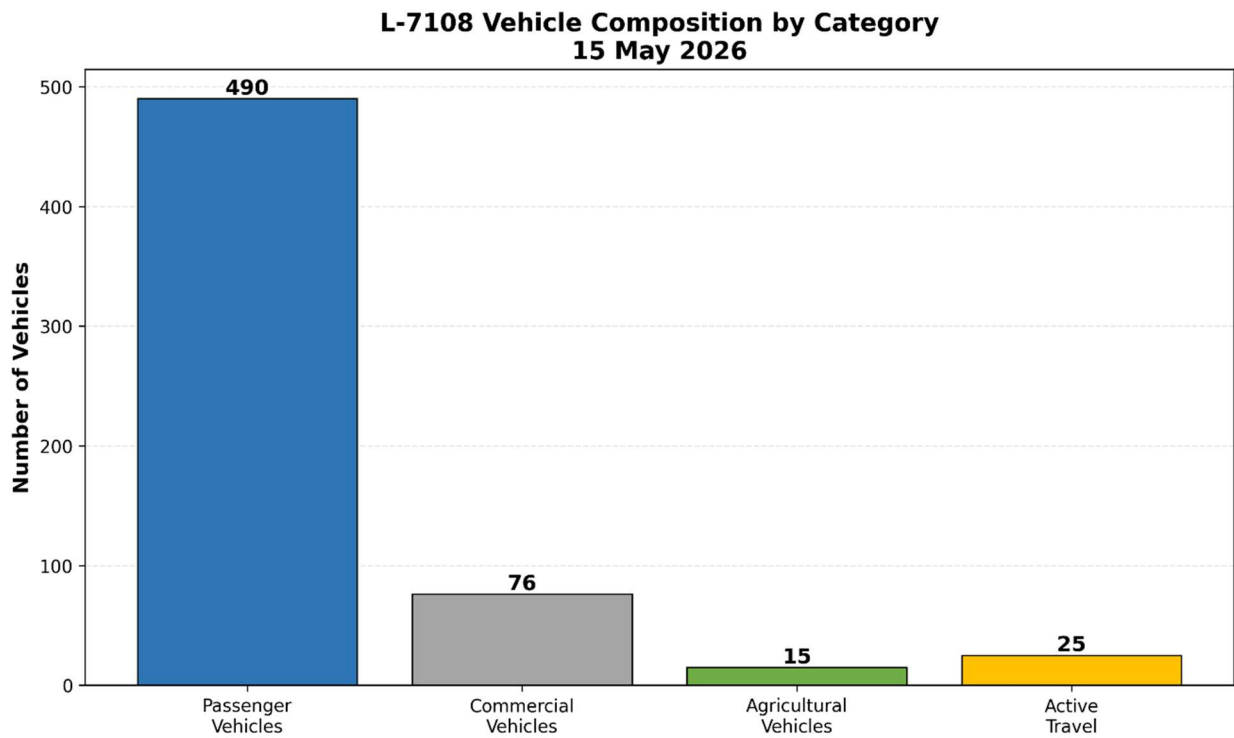


Figure 4.5 L7108 Vehicle Composition by Category — 15 May 2026

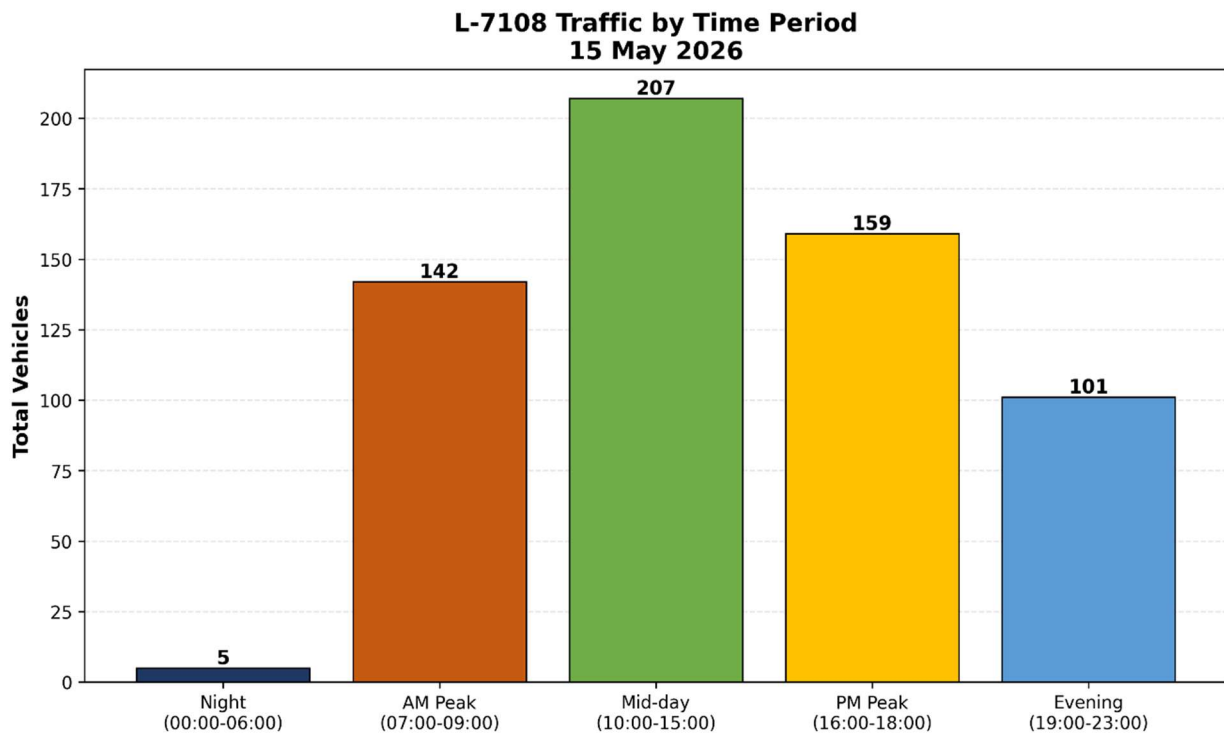


Figure 4.6: L7108 Traffic by Time Period — 15 May 2026

The traffic composition and volume characteristics recorded on 15 May 2026 demonstrate that the L7108 is not a lightly trafficked rural laneway. It is an actively used local distributor road serving established residential, agricultural and commercial communities across multiple townlands. The recorded daily traffic volume of 606 vehicles represents the real baseline against which the impact of a 5.5-month aggregate road closure on this corridor should be assessed.

4.4.4 Comparison with the L3103 Survey

The Concern Group respectfully draws An Coimisiún Pleanála's attention to the substantial difference between the traffic characteristics recorded on the L7108 and the limited baseline data provided in the EIAR for the L3103.

The EIAR's single Automatic Traffic Counter survey on the L3103 was conducted on 13 February 2025 — a winter weekday during a period of minimal agricultural activity. No peak period analysis, vehicle composition breakdown or seasonal variation assessment was provided for that survey. No comparable survey was conducted on the L7108 or L7109.

The community-conducted survey on the L7108 on 15 May 2026 provides peak period analysis, vehicle composition by category, hourly distribution data and agricultural vehicle detail. This level of baseline characterisation is essential for assessing the likely significant

effects of prolonged road closures, traffic management measures and diversion arrangements on the receiving environment.

The Concern Group respectfully submits that the 606 vehicle movements recorded on a single working day on the L7108 in May — during a period of relatively normal agricultural activity and school term, but outside peak silage-cutting, slurry-spreading and livestock sale periods — demonstrates the inadequacy of relying upon a single winter-day survey on a different road to characterise the baseline traffic environment for roads subject to full closure for up to 5.5 months.

Furthermore, the recorded presence of 26 agricultural vehicle movements in a single day — including solo tractors, tractors towing equipment, jeeps towing livestock trailers and milk collection vehicles — directly contradicts any assumption that the affected roads carry only occasional or negligible agricultural traffic. These recorded movements do not represent peak agricultural traffic conditions associated with busy seasonal farming activity such as silage-cutting or slurry-spreading operations. The survey date also did not coincide with livestock sale activity at Athenry Mart and therefore does not reflect peak livestock transport requirements. Nevertheless, the survey demonstrates the extent of normal agricultural activity, milk collection logistics and rural road usage characteristic of the receiving environment, all of which would be directly disrupted by prolonged road closures and stop/go traffic management systems operating within constrained rural roads.

4.4.5 Significance for Impact Assessment

The baseline traffic data now available to An Coimisiún Pleanála for the L7108 demonstrates that:

- The L7108 carries substantially higher and more varied traffic than would be inferred from the absence of any survey in the EIAR;
- The road serves distinct peak periods associated with commuter, school and agricultural activity that would be directly affected by prolonged road closures and traffic management measures;
- Agricultural vehicle movements occur throughout the working day and represent a material proportion of total traffic, with particular implications for the interaction between large agricultural machinery and stop/go traffic management systems within constrained rural roads;
- The aggregate 5.5-month closure period proposed for the L7108 would affect 606 daily vehicle movements — representing real residents, farmers, businesses, school transport, emergency access and community activity throughout the receiving environment;
- The absence of any equivalent baseline survey conducted by the applicant for the L7108 or L7109 represents a material deficiency in the assessment, the consequences of which undermine the reliability of all subsequent traffic management, capacity, diversion and impact conclusions drawn in the EIAR for these roads.

The Concern Group further submits that the affected road network, including the L3103, L7108 and L7109 corridors, performs a significantly broader function than that of simple rural access roads. These roads serve established homes, farms, schools, businesses, sporting and community facilities and form part of the daily movement network connecting Athenry with the surrounding rural area. The roads are regularly used by pedestrians, cyclists, school transport, agricultural traffic and local residents undertaking daily work, education and community activities.

Insufficient consideration has been given within the EIAR to the likely effects of prolonged trenching works, traffic management systems, shuttle activity and recurring road disruption on vulnerable road users, active travel movement, local road safety, community connectivity and the practical day-to-day burden likely to arise for residents and businesses throughout the construction period.

The Concern Group further submits that the EIAR does not adequately assess the wider community and wellbeing implications associated with prolonged disruption to established movement patterns, local accessibility and daily rural life. More robust and enforceable measures are required in relation to traffic management, emergency access, pedestrian and cyclist safety, resident access continuity and construction-stage community protection.

The Concern Group respectfully submits that this community-conducted baseline survey provides An Coimisiún Pleanála with the first quantified evidence of the real traffic characteristics, community usage patterns and likely significant effects associated with the proposed prolonged road closures on the L7108 corridor.

4.4.6 The Gannow Comparison: A Substantially Smaller Cable on the Same Roads Was Assessed to a Materially Higher Standard

The Concern Group respectfully submits that the adequacy of the Traffic and Transport assessment in this application is directly demonstrated to be insufficient by comparison with the assessment provided for a related and concurrent infrastructure project affecting sections of the same road network.

The proposed Gannow Wind Farm grid connection (Galway County Council Ref. 2561412; ACP Case Reference 500493) involves the installation of a 38kV underground cable which follows sections of the same L7108 and L7109 road network as the proposed 220kV cable the subject of this application. The Gannow cable is of substantially lesser scale, lesser voltage, lesser trench depth and lesser engineering intensity than the proposed 220kV cable. Notwithstanding this, the Traffic Management Plan submitted with the Gannow application (EIAR Appendix 15-2) provided a materially more detailed and specific road-by-road assessment, including:

- L7108, Section 11: 24 working days of road closure; diversion route adding 5.9 kilometres of additional travel per trip for affected residents and road users;
- L7109, Section 13: 8 working days of road closure; diversion route adding 9.2 kilometres of additional travel per trip.

No equivalent road-by-road closure duration has been provided for the L7108 or the L7109 in this application. No road-specific diversion distance has been calculated or disclosed. No assessment of additional daily travel burden on any affected resident, farmer or business along any of the five affected road corridors has been provided.

Furthermore, the Gannow application (EIAR Appendix 12-9) provided a dedicated baseline noise survey for the cable corridor comprising five measurement receptor points at specific locations along the shared road sections, with recorded daytime ambient levels of 43–48 dB LA90 at receptor N4 on the L7108. No baseline noise survey of any description has been provided for any receptor along the 8.1 kilometre cable corridor in this application.

The Concern Group respectfully asks An Coimisiún Pleanála to consider whether it is appropriate to grant permission for a 220kV strategic infrastructure cable of significantly greater scale, voltage, engineering intensity and community impact than the Gannow 38kV cable, on the basis of a materially lesser standard of assessment than that provided for the smaller project affecting the same constrained local roads.

The Concern Group further submits that the cumulative infrastructure implications of the shared corridor between the two cable systems — extending to 2.2km of the L7108 and a further converging section of the L7109 — raise concerns that go beyond traffic management methodology. These matters are addressed in full in the Cumulative Infrastructure Impact chapter of this submission, which should be read in conjunction with this section.

In particular, An Coimisiún Pleanála is respectfully referred to the analysis of Technical Note 03 (Appendix 16.2, Volume 3 of the EIAR) and the unresolved questions of thermal independence between the two cable systems, physical accommodation within the road cross-section, the accumulation of permanent joint bay structures within a constrained road, and the absence of any coordinated construction programme across both projects.

4.5 Traffic Management, Access and Emergency Access

The Concern Group respectfully submits that the traffic management and access arrangements proposed within the EIAR and associated Construction Methodology documentation do not adequately assess the practical implications of prolonged construction activity occurring within constrained rural roads serving established residential, agricultural and commercial communities.

The EIAR confirms that the proposed underground cable corridor would require phased trenching operations, stop/go traffic management systems, temporary full and partial road closures, diversion routes and prolonged occupation of sections of the local road network throughout the construction programme.

Particular concern arises regarding the proposed full closures affecting sections of the L7108 and L7109 corridors. The EIAR states that only through-traffic would be affected and that residents would retain access from one side of closure segments. The Concern Group respectfully submits that this materially understates the practical effect of the proposed works within an established ribbon-developed rural-residential environment where excavation, trenching, traffic management and reinstatement operations may occur immediately adjacent to residential entrances, farm accesses and local business access points over prolonged periods.

The affected roads serve established residential communities, agricultural holdings, local businesses, commuter traffic and school-related traffic throughout the receiving environment. The road network also facilitates agricultural machinery, milk collection vehicles, carers, emergency service access and access to defibrillator and emergency medical response locations throughout the affected townlands.

Particular concern arises regarding school transport and educational access associated with Lisheenkyle National School, Presentation College Athenry and Coláiste an Chláirín, together with emergency service access, carers, home-support services, agricultural servicing and milk collection activity. These are ordinary daily movements within the receiving environment and should have been assessed specifically rather than treated as incidental local traffic.

4.5.1 The Proposed Diversion Routes Are Mutually Dependent — Simultaneous Closure Has Not Been Addressed

The Concern Group respectfully submits that the proposed diversion arrangements contain a fundamental circularity that has not been acknowledged or addressed within the EIAR.

The EIAR confirms at Section 10.2.1.2.1 that the diversion routes for the L7108 and L7109 closures are as follows:

- L7108 (Lisheenkyle East) diversion route: via the L7109, then the R339, then the L3103;
- L7109 diversion route: via the L7108, then the L3103, then the R339.

Each road's proposed diversion route passes directly through the other road that is simultaneously subject to closure under the same construction programme. The L7108 closure programme extends to approximately 5.5 months in aggregate. The L7109 closure programme extends to approximately 3.9 months in aggregate. Both closures fall within the same overall construction programme, and neither the EIAR nor the Construction Methodology Report

provides any scheduling commitment that would guarantee these closures occur in strict sequence rather than concurrently or with overlapping periods.

No assessment has been provided of the scenario in which the L7108 and L7109 closures overlap in time. During any period of simultaneous or overlapping closure, the proposed diversion routes are unavailable. Traffic diverted from the L7108 cannot proceed via the L7109 if that road is simultaneously closed, and vice versa. The practical consequence — which has not been assessed — is that affected residents, agricultural users, emergency services and commercial traffic may have no viable diversion route and may face extended detours via the wider regional road network that have not been identified, assessed or agreed with Galway County Council.

No evidence has been provided demonstrating that Galway County Council has agreed or approved any viable alternative diversion strategy in the event of overlapping closures affecting the L7108 and L7109.

The absence of any assessment of simultaneous closure scenarios, overlapping diversion route conflicts or emergency access resilience during periods of concurrent road occupation is a material deficiency in the Traffic and Transport assessment, with direct implications for emergency vehicle response times, agricultural access, milk collection, school transport and the daily functioning of established residential communities throughout the construction programme.

This concern is further compounded by the cumulative construction scenario addressed in the Cumulative Infrastructure Impact chapter of this submission. If the construction programmes of the proposed 220kV cable and the proposed 38kV Gannow cable overlap — as the applicant's own Non-Technical Summary acknowledges is the assumed basis for the cumulative assessment — the L7108 and L7109 would face two entirely separate construction programmes, each requiring their own road closures, with diversion routes that are already internally circular for the Bord Gáis programme alone. The interaction between two overlapping construction programmes and a diversion network that is already inadequate for a single programme has not been assessed.

Particular concern also arises regarding:

- emergency vehicle response times during active construction phases;
- restricted access during periods of active trenching and road occupation;
- the absence of detailed emergency access protocols;
- the suitability of diversion routes for agricultural machinery and heavy vehicles;
- disruption affecting school and commuter traffic; and
- cumulative interaction between construction traffic and existing local traffic movement within constrained carriageway widths.

The Concern Group respectfully submits that the EIAR does not provide a route-specific access continuity plan for residents, schools, farms, businesses, carers or emergency services during prolonged road closures and active trenching works.

Insufficient assessment has also been provided regarding the practical traffic management implications arising from the proposed works in proximity to existing high-pressure gas infrastructure, including temporary traffic restrictions associated with gas main crossing works, emergency access resilience during periods of restricted road operation, and contingency arrangements in the event of utility-related incidents during the construction programme. Insufficient information has been provided regarding coordination arrangements between the applicant, gas infrastructure operators, emergency services and Galway County Council during periods of active construction and utility interaction works.

The EIAR further states that construction parking would be accommodated within the main project compound and that shuttle transport arrangements would be utilised for construction operatives associated with the underground cable corridor.

However, insufficient information has been provided regarding:

- the routing and operation of shuttle vehicles;
- interaction between shuttle traffic and local road users;
- the location of roadside shuttle pick-up, drop-off or turning areas within constrained rural roads used daily by residents, school traffic, agricultural vehicles and local businesses;
- cumulative vehicle activity associated with multiple construction crews;
- or the practical functioning of shuttle arrangements within constrained local roads already subject to phased closures and traffic management operations.

Particular concern also arises regarding the proposed onsite substation and associated infrastructure, which appear to rely primarily upon a limited local road access arrangement within a constrained rural road network characterised by limited alternative access routes.

Insufficient information has been provided regarding:

- emergency access resilience to the substation compound during periods of active construction activity;
- contingency arrangements in the event of road obstruction or restricted access;
- and the interaction between emergency response requirements and prolonged traffic management measures affecting the surrounding road network.

Accordingly, the Concern Group respectfully submits that the proposed traffic management and access arrangements are insufficiently detailed and materially underestimate the likely practical impact of prolonged construction activity on residential access, agricultural movement, emergency response and the wider functioning of the receiving environment.

4.5.2 Comparative Planning Treatment of the L7108 Corridor

The Concern Group further notes that previous strategic-scale development proposals within the wider Athenry area have expressly recognised the constrained and sensitive nature of the L7108 local road corridor in the context of construction-related traffic impacts.

Planning documentation associated with the Apple Strategic Data Centre development at Derrydonnell, Athenry (**ABP Ref. PL07.245518**) and associated electricity infrastructure permissions, including the Apple grid connection and substation development (ABP Ref. 07.VA0020), included restrictions preventing construction-related traffic from using sections of the local road network, including the L7108 corridor.

The relevant planning documentation stated:

“No construction related traffic shall be permitted to use the L3104 or the L7108. All construction related traffic shall use only the National Road and Regional Road network to access the proposed development.”

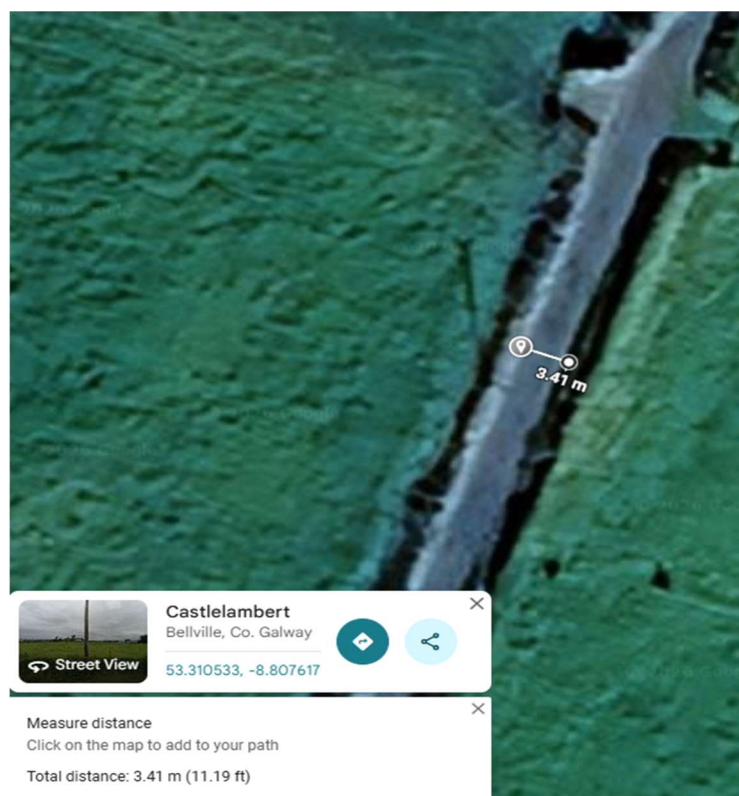


Figure 4.7 The image show Castlelambert Road (L7108), beside agricultural land. This road is too narrow for two cars to pass safely. Measuring 3.4m in width on google maps (Figure 4.8).

The Concern Group respectfully submits that this demonstrates prior recognition by the planning authority that the L7108 was unsuitable for significant construction-related traffic activity associated with major infrastructure development.

This previous planning treatment is materially relevant in the context of the present application because the proposed underground cable corridor would not merely permit occasional construction traffic movement along the L7108, but would instead involve:

- prolonged occupation of the road corridor by construction operations;
- trench excavation within the carriageway;
- repeated excavation and reinstatement works;
- stop/go traffic management systems;
- temporary full road closures;
- operation of heavy tracked plant and construction machinery;
- rock-breaking operations using 22-tonne excavators;
- installation of permanent underground joint bay infrastructure;
- and associated construction traffic and machinery movements extending over an aggregate closure programme of approximately 5.5 months.



Figure 4.8 The images show Castlelambert Road (L7108), beside agricultural land. This road is too narrow for two cars to pass safely. Measuring 3.4m in width on google maps.

The Concern Group respectfully submits that the present proposal therefore represents a materially greater level of road occupation, engineering intensity and disruption than the form of construction traffic restriction previously considered necessary in relation to the L7108 corridor.

The Concern Group further submits that the previous planning treatment of the L7108 corridor supports the position that:

- the affected roads possess recognised physical and operational constraints;
- residential amenity and road safety considerations are particularly sensitive within the receiving environment;
- reliance upon constrained local roads for major infrastructure construction activity has previously been considered inappropriate;
- and the EIAR materially underestimates the sensitivity and limited carrying capacity of the receiving environment traversed by the proposed underground cable corridor.

The Concern Group respectfully submits that insufficient explanation has been provided as to why road infrastructure previously considered unsuitable for construction-related traffic associated with major strategic infrastructure proposals is now proposed to accommodate prolonged trench excavation works, road closures, heavy construction occupation and associated infrastructure activity in the context of the present application (ACP Ref. 324162).

4.6 Pavement Analysis, Road Integrity and Reinstatement

The Concern Group respectfully submits that the EIAR does not adequately assess the likely impact of the proposed underground cable corridor on the long-term condition, structural integrity and reinstatement performance of the affected local road network.

The proposed development would require extensive trench excavation, repeated road openings, prolonged occupation of constrained rural roads, heavy construction traffic and installation of permanent underground infrastructure throughout sections of the local road network. The application documentation also acknowledges the presence of **shallow bedrock** and **karst limestone conditions** within sections of the route corridor, together with the confirmed requirement for rock-breaking operations using 22-tonne excavators.

The Concern Group respectfully submits that repeated trench excavation and reinstatement within such roads may give rise to:

- long-term pavement settlement;
- differential surface degradation;
- edge deterioration and cracking;

- weakened pavement structure;
- reduced carriageway lifespan;
- deterioration of verge stability;
- and drainage performance impacts.

The Concern Group further notes that the Civil Engineering Report (Appendix 2.1, Section 4.6) confirms that the proposed development includes the installation of a new 150mm potable water main along the L3103 corridor. This represents an additional permanent underground infrastructure burden on the affected road network, over and above the proposed 220kV cable and associated joint bay structures. The cumulative long-term underground infrastructure burden on the L3103 — comprising the proposed 220kV cable, permanent joint bay structures, a new 150mm water main and existing utility services — has not been assessed within the EIAR.

Particular concern arises regarding repeated reopening of recently reinstated road surfaces associated with cumulative infrastructure projects affecting the same constrained rural road corridors. The EIAR further does not adequately assess the implications of retaining the underground cable infrastructure in situ following decommissioning of the proposed development.

Accordingly, the Concern Group respectfully submits that the EIAR materially underestimates the likely long-term impact of the proposed underground cable corridor on pavement condition, road integrity, reinstatement performance and the future resilience of the affected local road network.

4.6.1 Castlelambert Overbridge: Unresolved Structural Safety Concerns Affecting the Proposed Cable Route

The Concern Group respectfully draws An Coimisiún Pleanála's attention to a critical and unresolved structural finding within the applicant's own documentation that is directly material to the safety and deliverability of the proposed grid connection works at Castlelambert.

The Exceptional Abnormal Loads (EAL) Structural Assessment Report (Document Reference: 0114485DG0025, Revision 8, AtkinsRéalis, dated 21 August 2025), submitted as part of the related Peaker Plant application (ACP Case Reference: 324113), formally assessed the structural capacity of Castlelambert Overbridge (structure reference DC-M17-005.00), which carries the L3103 local road over the M17 motorway. The Structural Review Form signed by the Lead Structural Assessment Engineer and the Principal Officer of the applicant's own design team records the following unambiguous conclusion:

"A comparative assessment using EAL, 30HB+HA, and LM1+LM3 (SV100) load combinations indicates that the bridge remains UNSAFE under EAL loading conditions. The permit vehicle should NOT be allowed to pass over the bridge."

The overall conclusions of the EAL Report state:

"Therefore the red route has been discounted for passage of 380 tonne equipment."

The applicant's own engineers formally certified, in August 2025, that Castlambert Overbridge cannot safely carry the loading conditions associated with this project. The proposed haulage route was abandoned as a direct consequence of this finding.

The Concern Group respectfully draws An Coimisiún Pleanála's attention to the fact that the proposed underground cable corridor in this application traverses the L3103 road at Castlambert, directly in proximity to this same bridge. The Construction Grid Connection Report (Vol. 3, Appendix 2.7) confirms that the cable route continues eastward within the L3103 at Castlambert, and that Joint Bay 08 (JB-08) is to be located, in the applicant's own words:

"in close proximity, east of the identified area for HDD receptor area infrastructure within the public owned area at Castlambert Bridge (L-3103)."

The proposed grid connection works at this location will require trench excavation and cable installation within the road surface in the immediate vicinity of the bridge, the installation of a permanent precast concrete Joint Bay structure beneath the road surface, and full-width road resurfacing following installation — all involving heavy tracked plant, including excavators of up to 22 tonnes, operating on and immediately adjacent to a bridge structure that the applicant's own engineers have assessed as structurally unsafe under project loading conditions.

The Concern Group further submits that insufficient consideration has been given to the extent to which permanent underground electrical infrastructure, joint bay installations and associated route sterilisation within the L3103 public road corridor may constrain the future ability of Galway County Council and relevant utility providers to undertake road widening, pavement strengthening, drainage upgrades, bridge-related works, utility coordination or other future infrastructure improvement works within this constrained section of the local road network.

No independent structural assessment of Castlambert Overbridge in the specific context of the proposed grid connection construction works has been submitted with this application. The applicant's documentation does not acknowledge the structural findings recorded in the EAL Report in the context of the cable works, nor does it provide any assessment of the implications of that finding for the safety of the proposed works at this location.

The Concern Group respectfully submits that An Coimisiún Pleanála cannot be satisfied that the proposed construction works in the vicinity of Castlambert Overbridge are safe or

deliverable without an independent structural assessment addressing this specific interaction. The applicant has not demonstrated that the proposed works can be undertaken without risk to the structural integrity of a bridge that its own engineers have assessed as structurally unsafe under the loading conditions this project will impose.

4.6.2 Rock-Breaking in Proximity to a Live High-Pressure Transmission Main — An Unresolved Safety Conflict

The Concern Group respectfully submits that the EIAR does not adequately assess a significant and unresolved safety conflict arising from the proposed construction methodology in the townland of Knocknacreeva.

The Construction Grid Connection Report (Vol. 3, Appendix 2.7, Section 10.1.3) confirms that the proposed underground cable route will directly intersect an existing high-pressure gas transmission main at Knocknacreeva (coordinates: X=545591.5, Y=728250.1). The cable installation works in this area require open mechanical excavation of the road surface and subsoil in direct proximity to a live gas pipeline.

The Construction Methodology Report (Vol. 3, Appendix 2.7, Section 3.0) confirms that the construction works along the cable corridor will require the use of 22-tonne tracked excavators equipped for rock-breaking operations, having regard to the shallow bedrock and karst limestone conditions identified within the route corridor. The applicant's own documentation further confirms at Section 11.1.3 that fissured or fractured rock is identified as unsuitable geology for the HDD drilling process — karst limestone is by definition fissured and fractured rock, and this geological condition is present throughout significant sections of the open-trench route.

Activity	Distance within which GNI shall be consulted
Any excavation actions	10m
Piling	15m
Surface mineral extraction	100m
Land filling	100m
Demolition	150m
Blasting	400m
Wind farm	2 times the turbine mast height from the nearest edge of a transmission pipeline
Trenchless techniques	10m
Pressure testing	8m

Table 3-1 - Excerpt from GNI COP 'Working in the vicinity of the transmission network'.

The Civil Engineering Report (Appendix 2.1, Table 3-1, page 14, see above) explicitly requires Gas Networks Ireland (GNI) consultation for any blasting or heavy mechanical excavation within 400 metres of a high-pressure gas transmission main, and for any mechanical excavation within 10 metres of the main.

No method statement for mechanical excavation in proximity to the gas main at Knocknacreeva has been submitted with this application. No independent safety assessment of the proposed works at this location has been provided. No written confirmation from Gas Networks Ireland that the proposed excavation methodology — including the use of heavy tracked excavators for rock-breaking in karst conditions — can be safely implemented in proximity to a live high-pressure gas transmission main has been submitted.

The Concern Group respectfully submits that an unassessed and unmitigated safety conflict of this character, arising from the interaction between confirmed rock-breaking operations, karst geology and a live high-pressure gas main in a populated rural townland, is incompatible with the standard of assessment required under the EIA Directive and the requirements of the Health and Safety Authority. An Coimisiún Pleanála cannot be satisfied on the basis of the information before it that the proposed works can be safely implemented at this location.

4.6.3 Construction-Phase COMAH and Hazardous Pipeline Interaction

The Concern Group respectfully submits that the EIAR and associated COMAH documentation do not appear to adequately assess the construction-phase interaction between the proposed underground grid connection works and the existing live high-pressure gas transmission infrastructure crossing the route corridor.

The Construction Methodology documentation confirms that trench excavation, road opening and rock-breaking works are proposed in proximity to, and crossing, an existing high-pressure gas transmission main. The documentation further states that the gas supply would be “turned off” by Gas Networks Ireland during portions of the crossing works. However, insufficient detail has been provided regarding whether this would involve full depressurisation, purging, isolation or other hazardous pipeline safety procedures.

The Concern Group respectfully submits that the assessment appears to focus primarily on the operational phase of the proposed Lower Tier COMAH establishment and does not adequately assess construction-phase major accident hazards associated with simultaneous excavation works adjacent to hazardous gas infrastructure.

In particular, the documentation does not appear to provide detailed assessment of:

- construction-phase major accident hazard scenarios associated with excavation adjacent to a live high-pressure gas transmission line;

- simultaneous operations (SIMOPS) involving construction of the proposed energy development and hazardous pipeline crossing works;
- temporary worker occupancy and construction compounds within any hazardous pipeline consultation distance;
- construction traffic management, emergency access and emergency response arrangements during trenching and road closure operations;
- potential domino-effect interaction pursuant to Article 11 of the European Communities (Control of Major Accident Hazards Involving Dangerous Substances) Regulations 2015;
- cumulative interaction between the proposed Lower Tier COMAH establishment and hazardous pipeline infrastructure during the construction and commissioning phases;
- whether the Health and Safety Authority was specifically consulted regarding construction-phase excavation adjacent to the high-pressure gas transmission infrastructure;
- or the implications of prolonged or extended crossing works should the gas infrastructure require reinstatement while adjacent trenching or construction activity remains ongoing.

The Concern Group further submits that the proposed road opening and trenching works may create temporary construction-phase conditions materially different from those assessed within the operational COMAH assessment, including increased ignition sources, excavation instability, temporary traffic restriction, constrained emergency access and cumulative infrastructure interaction within the receiving environment.

The Concern Group further submits that the receiving environment at sections of the proposed gas main crossing corridor comprises an established rural-residential environment characterised by occupied dwellings and adjoining lands in exceptionally close proximity to the proposed excavation works. Measurements derived from publicly available aerial mapping indicate that existing residential properties may be located approximately 34 metres from sections of the proposed road opening and trench excavation works, while adjoining undeveloped lands with potential future residential or rural development potential may be located approximately 12 metres from the proposed works corridor.

The Concern Group respectfully submits that insufficient assessment has been undertaken regarding the implications of prolonged excavation activity, rock-breaking operations, vibration, noise, temporary hazardous pipeline interaction and associated COMAH-related risk perception for existing residential amenity and the future planning and development potential of adjacent lands within the receiving environment.

Particular concern arises regarding the extent to which the presence of major underground energy and hazardous gas infrastructure within constrained rural road corridors may contribute to future planning constraints affecting nearby lands and residential development potential. Residents within the receiving environment have previously experienced planning difficulties associated with infrastructure and utility service constraints, and insufficient assessment has

been undertaken regarding whether the cumulative concentration of underground energy, gas and utility infrastructure may further restrict, sterilise or complicate future residential, agricultural or rural development opportunities in adjoining lands.



Figure 4.9 – Residential proximity to proposed gas corridor works (approx. 34m)

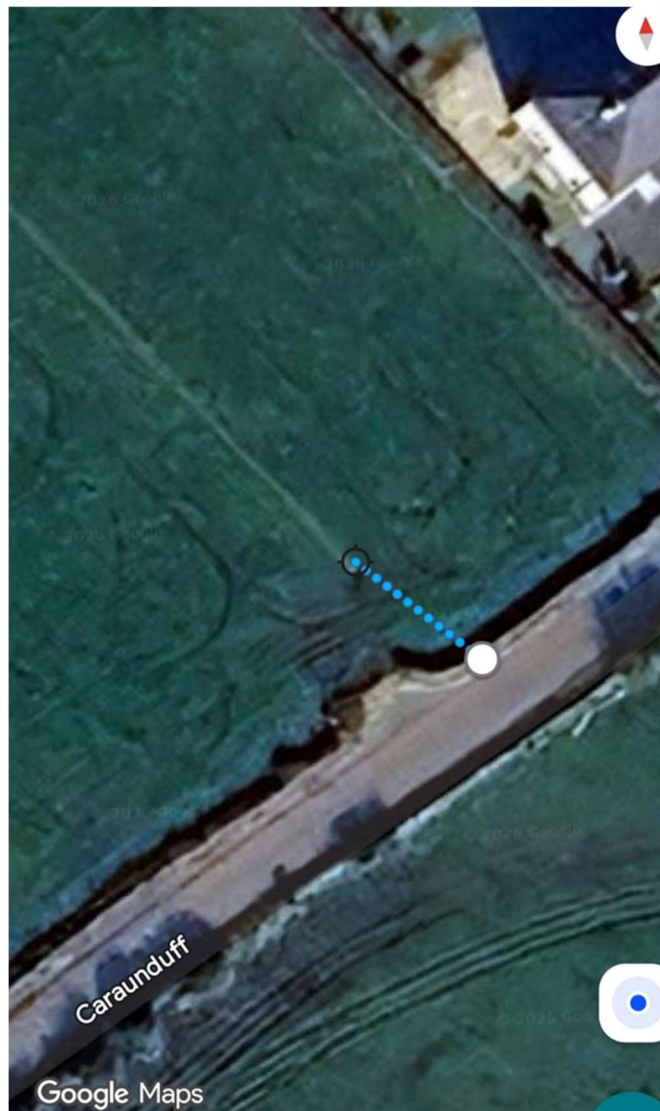


Figure 4.10. Approximate proximity of adjoining lands with potential future development potential to proposed excavation and hazardous pipeline interaction works.

The Concern Group further submits that the EIAR does not adequately assess the combined effect of excavation works, hazardous pipeline interaction, traffic restrictions, construction vibration, rock-breaking activity and emergency access limitations within such close proximity to occupied residential properties and potentially developable lands.

Accordingly, the Concern Group respectfully submits that further clarification and detailed assessment are warranted regarding construction-phase hazardous pipeline interaction, major accident hazard assessment, emergency planning, residential amenity impacts, future land-use implications and Article 11 domino-effect considerations arising from the proposed development.

4.7 Monitoring and Mitigation

The Concern Group respectfully submits that the monitoring and mitigation measures proposed within the EIAR are insufficiently detailed having regard to the scale, duration and engineering intensity of the proposed underground cable corridor and associated construction activity.

While the EIAR proposes general traffic management and construction mitigation measures, insufficient information has been provided regarding implementation mechanisms, monitoring responsibilities, enforcement procedures, corrective intervention measures and contingency arrangements in the event that mitigation measures prove ineffective during construction activity.

Particular concern arises regarding the absence of:

- route-specific monitoring commitments for the L7108 and L7109;
- independent road condition monitoring before, during and after construction;
- detailed reinstatement quality assurance measures;
- ongoing traffic impact review mechanisms;
- independent auditing of traffic management operations;
- and clearly defined corrective intervention procedures where impacts exceed predicted levels.

No commitment has been identified regarding independent pre-construction structural condition surveys of residential properties, agricultural buildings, boundary walls or entrances located adjacent to sections where excavation and rock-breaking activity may occur.

Insufficient information has been provided regarding:

- vibration monitoring thresholds,
- peak particle velocity (PPV) limits,
- structural monitoring protocols adjacent to residential properties,
- or corrective response procedures in the event of vibration-related structural damage.

Particular concern also arises regarding the absence of detailed monitoring proposals relating to;

- cumulative road deterioration,
- settlement or subsidence following reinstatement,
- verge failure and drainage impacts,
- repeated access disruption affecting residents and businesses,
- and cumulative interaction with other infrastructure projects affecting the same road network, including the proposed Gannow Wind Farm grid connection project (Galway County Council Ref. 2561412; ABP Ref. PL07.500493).

The Construction Methodology documentation further confirms that separate road opening licences would be required from Galway County Council.

The Concern Group respectfully submits that the affected local roads are constrained rural roads serving settled communities, residential properties, agricultural activity and local businesses rather than strategic transport corridors designed to accommodate prolonged infrastructure occupation and repeated excavation activity.

Accordingly, significantly more detailed, route-specific and independently verifiable monitoring and mitigation measures would be required in order to adequately manage the likely impacts arising from the proposed development.

The Concern Group respectfully submits that mitigation measures relying upon future contractor compliance, road-opening licence conditions and post-consent traffic management plans cannot remedy fundamental deficiencies in baseline assessment, closure-duration assessment and cumulative traffic impact evaluation within the EIAR itself.

4.8 Decommissioning and Long-Term Infrastructure Implications

The EIAR states that minimal traffic impact is anticipated during the decommissioning phase on the basis that the proposed underground cable infrastructure would remain in situ following cessation of the proposed development.

The Concern Group respectfully submits that insufficient consideration has been given within the EIAR to the long-term infrastructure implications associated with retaining substantial underground electrical infrastructure permanently within the affected local road network. The permanent retention of major underground electrical infrastructure within constrained rural roads constitutes a continuing long-term infrastructure burden that has not been adequately assessed.

Particular concern arises regarding the cumulative long-term impact of:

- permanent underground cable infrastructure retained in the road structure following decommissioning;
- permanent underground joint bay structures at multiple locations within constrained local roads;
- future maintenance and access requirements for retained infrastructure;
- cumulative underground utility congestion with existing services and the proposed new 150mm water main on the L3103;
- and restrictions affecting future road improvement, residential, agricultural and utility development within the receiving environment.

Aspects of the final cable alignment and infrastructure positioning remain subject to detailed design and possible modification following further assessment. The Concern Group respectfully submits that insufficient information has been provided regarding the final long-term configuration of underground infrastructure within the affected roads, future maintenance responsibilities, future access arrangements for infrastructure repair or replacement, or the long-term implications for management and operation of the affected road network.

The Concern Group further submits that the EIAR improperly characterises the decommissioning phase as generating negligible impact solely on the basis that the underground cable infrastructure would remain in place. The EIAR does not provide any meaningful assessment of long-term maintenance intervention requirements, future excavation implications or cumulative utility congestion arising from retention of the underground transmission infrastructure within constrained rural roads. The permanent retention of major underground electrical infrastructure within constrained rural roads represents a significant and enduring land-use and infrastructure burden for the communities and road network of the affected townlands, and this has not been adequately assessed.

4.9 Difficulties Encountered During Preparation of the EIAR Traffic and Transport Chapter

Chapter 10 of the EIAR states that no difficulties were encountered during preparation of the Traffic and Transport assessment. The Concern Group respectfully submits that this conclusion is difficult to reconcile with the extent of acknowledged uncertainty, deferred design detail and unresolved construction methodology matters identified throughout the application documentation.

The applicant's own documentation confirms that aspects of the final underground cable alignment remain subject to further assessment and possible modification; that final separation distances between underground infrastructure systems remain subject to detailed design confirmation; and that cumulative interaction with other underground infrastructure remains unresolved. The documentation further acknowledges unresolved utility coordination matters and ongoing design development requirements, indicating that significant aspects of the proposed development remain uncertain at the current stage of assessment.

Particular concern arises regarding the cumulative interaction with the proposed Gannow Wind Farm grid connection project (ACP Case 500493), including shared occupation of constrained sections of the L7108 corridor and unresolved cable separation distances requiring confirmation at detailed design stage.

Accordingly, the Concern Group respectfully submits that the EIAR does not adequately acknowledge the extent of uncertainty, deferred design detail, cumulative infrastructure

interaction and practical implementation complexity associated with the proposed underground cable corridor and associated traffic management arrangements.

4.10 Overall Conclusions

The Concern Group respectfully submits that the EIAR materially underestimates the likely traffic, transport, construction and cumulative community impacts arising from the proposed underground cable corridor and associated infrastructure works.

The proposed development comprises a substantial and prolonged linear infrastructure project extending through established rural-residential townlands characterised by residential occupation, ribbon development, agricultural activity, commuter-related traffic movement, school-related traffic, local commercial operations and constrained rural roads with limited alternative access arrangements.

The Traffic and Transport assessment is fundamentally undermined by the complete absence of any traffic survey on the L7108 or the L7109 — the two roads subject to the longest full road closures in the entire construction programme. The entirety of the baseline data in this application is derived from a single ATC survey on the L3103 conducted on one day in February 2025. No baseline whatsoever has been established for the roads that will be most substantially affected.

The Concern Group respectfully submits that the following specific failures in the assessment have been demonstrated:

- No traffic survey of any kind on the L7108 or the L7109, the two roads facing the greatest closure burden;
- A single-day winter survey on the L3103 that does not reflect conditions throughout the annual cycle;
- An aggregate consolidated closure programme — approximately 5.5 months on the L7108 — that has never been presented to the community or to An Coimisiún Pleanála in a single document;
- Commissioning closures of 2 weeks per road confirmed in a separate document and absent from the EIAR;
- Diversion routes that are mutually dependent — L7108 diverts via L7109 and L7109 diverts via L7108 — with no assessment of simultaneous closure scenarios;
- Unresolved cumulative infrastructure conflicts with the Gannow 38kV cable in the shared 2.2km L7108 corridor, including unconfirmed thermal separation requirements, joint bay structures from both applications proposed at the same or near-identical road locations (separations of 85m to 150m, and in one case the same location), no coordinated construction programme, and no assessment of combined road closure impact on affected communities — as addressed in full in the Cumulative Infrastructure Impact chapter of this submission;

- A materially lesser standard of assessment than that provided for the smaller Gannow 38kV cable on the same roads;
- An unresolved structural safety contradiction at Castlelambert Overbridge, which the applicant's own engineers have certified as unsafe, through which the cable route and Joint Bay 08 are proposed to pass;
- An unresolved safety conflict between confirmed rock-breaking operations in karst geology and a live high-pressure gas transmission main at Knocknacreeva, with no GNI method statement submitted;
- No independent pre-construction structural condition surveys for properties adjacent to rock-breaking works;
- An unassessed cumulative underground infrastructure burden on the L3103, including a new 150mm water main in addition to the 220kV cable and joint bays;
- Permanent retention of substantial underground infrastructure post-decommissioning is characterised as a negligible impact without adequate long-term assessment.

The EIAR repeatedly treats the affected roads primarily as engineering work corridors while insufficiently assessing the established residential, agricultural and community function of the receiving environment. The characterisation of prolonged closures affecting multiple settled rural communities over periods of up to five and a half months as temporary, short-term and not significant is not supported by the evidence.

The Concern Group respectfully submits that the likely impacts identified above are inconsistent with the objectives of the Galway County Development Plan 2022–2028 relating to protection of residential amenity, sustainable rural communities and appropriate management of development impacts within evolving rural settlement areas, and with the requirements of the EIA Directive as confirmed in *Holohan v An Bord Pleanála* regarding the need for comprehensive, integrated and internally consistent assessment of all likely significant effects.

Accordingly, the Concern Group respectfully submits that the EIAR materially underestimates the likely cumulative traffic, transport, construction, road integrity and community impacts arising from the proposed development and does not provide a sufficient basis upon which An Coimisiún Pleanála can be satisfied that the proposed development will not give rise to significant adverse effects on the receiving environment.

5 Cumulative Infrastructure Impact — The Gannow Wind Farm Grid Connection

5.1 Introduction

This chapter addresses the cumulative infrastructure impacts arising from the potential interaction between the proposed 220kV underground cable grid connection the subject of this application (ACP Case Reference: 324162) and the proposed 38kV underground cable grid connection associated with the Gannow Wind Farm development (Galway County Council Ref. 2561412; ACP Case Reference: 500493).

The Concern Group respectfully submits that the cumulative assessment of these two projects, as presented within the EIAR and the accompanying Technical Note 03 (Appendix 16.2, Volume 3 of the EIAR, TLI Group, January 2026), is fundamentally inadequate. The applicant has filed its own engineer's technical analysis as supporting documentation — analysis which, when read carefully, reveals a series of unresolved technical, physical and operational conflicts that have not been addressed in the EIAR or disclosed transparently to An Coimisiún Pleanála or to the affected community.

The Concern Group further submits that Technical Note 03 (Appendix 16.2) represents a document of exceptional significance to this application. It was prepared by TLI Group — the same engineering consultancy responsible for the Construction Methodology Report and grid connection design for this application — on behalf of and at the instruction of Bord Gáis Energy. Its stated purpose is to question the technical viability of the Gannow grid connection proposal. In doing so, it contains admissions about the shared road corridor, the physical constraints of accommodation, the unresolved thermal interaction between the two cable systems, and the absence of any agreed or coordinated construction programme, that materially undermine the cumulative assessment presented in the EIAR.

The Concern Group respectfully submits that An Coimisiún Pleanála should treat Technical Note 03 (Appendix 16.2) as a primary source of evidence in its assessment of the cumulative impacts of this application, and that the conclusions of the EIAR's cumulative chapter are not supported by the evidence contained within that document.

5.2 The Shared Road Corridor — Two Cable Systems, One Constrained Road

Technical Note 03 confirms that both the proposed 220kV Bord Gáis underground cable and the proposed 38kV Gannow underground cable intend to occupy the same section of the L7108 (Lisheenkyle East Road) for a shared corridor of 2.2 kilometres. The note states:

"Both projects, proposed 220kV UGC Grid Connection and 38kV Gannow Route Option converge on the local road L7103 (Ch.5300m) and intend to use the L7108 to continue towards the Cashla 220kV/110kV node. The 38kV Gannow Route Option is intended to share 2.2km of the planned route with the proposed 220kV UGC Grid Connection, until Ch.3100m, where the 38kV Gannow Route Option will deviate to an off-road alignment."

— Technical Note 03 (Appendix 16.2), TLI Group, January 2026, p.4

The note further confirms that the two circuits will converge again on the L7109, approximately 850 metres south of the Cashla substation. The shared corridor therefore extends across sections of both the L7108 and the L7109 — the same two roads that are subject to full closure for the longest durations in the construction programme for this application alone.

The Concern Group respectfully submits that this shared corridor represents a fundamental cumulative infrastructure problem that has not been resolved at the time of this application. The L7108 is already acknowledged throughout the application documentation to be too narrow to accommodate the 220kV cable works without full road closure. The EIAR confirms that full closures of approximately 3 kilometres of the L7108 are required for the main cable construction alone, with further closures for resurfacing and commissioning. The introduction of a second cable system requiring its own installation within the same narrow road curtilage raises questions of physical accommodation that have not been answered.

Table 5.1: Cumulative Cable Infrastructure — Shared Corridor Burden

Project	Cable Type	Voltage	Approx Route Length in Shared Corridor (L-7108)	Joint Bays in Shared Section	Construction Duration
Cashla Peaker Grid Connection (ACP 324162)	Underground 220kV	220kV	~2.2 km	Minimum 2 joint bays	See Table 4.1
Gannow Wind Farm Grid Connection (ACP 500493)	Underground 38kV	38kV	~2.2 km	Minimum 2 joint bays	Separate programme (not coordinated)

Combined Burden: 4+ permanent joint bay structures in 2.2km of constrained rural road
Source: TLI Group Technical Note 03 (Appendix 16.2, Volume 3); EIAR Chapter 16

5.3 Thermal Independence of Cable Systems — Unresolved at Planning Stage

Technical Note 03 identifies a specific and unresolved technical problem arising from the proximity of the two cable systems within the shared corridor. The note states:

"It is anticipated that, given the potential for mutual heating of cable circuits, the thermal independency would be maintained with adequate horizontal separation — will need to be confirmed at detailed design, to mitigate against overheating and derating of both circuits. This would be a standard request from EirGrid to ensure that the seasonal operating current values are met and continuous."

— Technical Note 03 (Appendix 16.2), TLI Group, January 2026, p.5

The Concern Group respectfully submits that this passage discloses an unresolved operational engineering problem of material significance. The two cable systems, when installed in proximity within the same road corridor, have the potential to cause mutual heating of their respective circuits. If adequate horizontal separation is not achieved, both systems risk overheating and derating — a reduction in their operational capacity below the levels required to deliver the contracted output.

Table 5.2: Cable System Specifications — Cashla vs Gannow

Parameter	Cashla Peaker 220kV	Gannow Wind Farm 38kV	Implication
Voltage	220kV	38kV	Higher voltage = greater thermal output and separation requirements
Cable Configuration	2 No. circuits	1 No. circuit	Cashla requires more space
Trench Width (minimum)	700mm (per Construction Methodology)	Not specified (likely 400-500mm)	Combined excavation width substantial
Joint Bay Frequency	Every ~800-1000m typical for 220kV	More frequent for 38kV	Multiple permanent structures in shared corridor

Thermal Output	Higher (proportional to voltage/current)	Lower	Mutual heating concern raised in Technical Note 03
Required Separation	Not quantified (deferred to detailed design)	Not quantified	Unresolved at planning stage
Burial Depth	Standard 220kV depth (~1.2m cover)	Shallower (38kV standard)	Potential vertical conflicts with existing utilities

Source: Construction Methodology Report Appendix 2.7; TLI Technical Note 03 Appendix 16.2; EirGrid/ESB standards

The critical admission in this passage is that the required horizontal separation to prevent mutual heating has not been determined. It will need to be confirmed at detailed design. This is not a solved problem. It is not a mitigated risk. It is an identified technical constraint whose resolution has been deferred beyond the planning stage.

The Concern Group further submits that the consequences of this deferral are significant. The L7108 is a constrained rural road with a narrow carriageway. The applicant's own documentation confirms that the road profile is insufficient to allow joint bay installation without impacting traffic flow — for the 220kV cable alone. If the required horizontal separation between the two cable systems cannot be achieved within the road curtilage of the L7108, the options available are:

- installation at greater depth within the existing road, increasing the scale and duration of road-opening and significantly extending road closure periods;
- relocation of one cable system to an off-road or alternative alignment, which has not been assessed, consented, or agreed with any landowner;
- or acceptance of a reduced operational current and consequent derating of one or both cable systems, which affects the operational viability of this application.

None of these scenarios has been assessed in the EIAR. None has been disclosed to An Coimisiún Pleanála as a possible outcome. The EIAR's conclusion that cumulative impacts are manageable and short-term is not supported by the evidence in the applicant's own Technical Note 03.

5.4 Accumulation of Joint Bay Infrastructure in a Constrained Road

Technical Note 03 confirms that the cumulative effect of both cable systems occupying the shared 2.2km section of the L7108 will result in a minimum of four permanent underground

concrete joint bay structures within that single road section — two from the 220kV Bord Gáis cable and a minimum of two from the 38kV Gannow cable. The note states:

"The cumulative impact for this local road section will result in 2 Nr. 220kV circuit Joint Bays being encountered. Whilst considering the 38kV Gannow Route Option, no joint bay locations have been identified as part of the planning application (Reference Nr. 2561412). 38kV Joint Bays are typically placed at 850 to 900m intervals. In lieu of this, it would be expected that at a minimum, 2 Nr. 38kV [joint bays] would be installed within this common section of the L7108."

— Technical Note 03 (Appendix 16.2), TLI Group, January 2026, p.4

Each 220kV joint bay is, as confirmed in the Construction Methodology Report, a precast concrete structure measuring 8 metres long by 2.5 metres wide by 2.05 metres deep, installed below the road surface with an access hatch at finished road level. The accumulation of a minimum of four such structures — plus associated communication chambers and earth sheath link chambers at each joint bay location — within a single 2.2km section of an already constrained rural road represents a permanent and substantial underground infrastructure burden that has not been comprehensively assessed.

The Concern Group respectfully submits that the cumulative physical footprint of this underground infrastructure within the L7108, combined with the existing utility services already present in the road corridor, has not been assessed in terms of:

- the available space within the road cross-section to accommodate all required infrastructure at the necessary separations;
- the long-term implications for road maintenance, future utility works and carriageway structural integrity;
- the interaction between multiple permanent concrete structures and the drainage and pavement performance of a constrained rural road; or
- the implications for any future road improvement, widening or realignment works along this corridor.

Joint Bay Proximity Analysis — Evidence from the Applicants' Own Planning Drawings

Technical Note 03 (Appendix 16.2) estimates a minimum of four permanent underground joint bay structures within the shared 2.2km section of the L7108 from the two cable systems combined. The Concern Group respectfully submits that this estimate, while useful as a baseline, understates the actual density of joint bay infrastructure when the two applications' planning drawings are examined in detail.

The Concern Group has reviewed the planning drawings submitted by both applicants — the MKO drawings submitted by Gannow Ltd (Planning Reference: 2561412) and the TLI Group

drawings submitted by Bord Gáis Energy (ACP Case Reference: 324162) — and has measured the separation distances between proposed joint bay locations from both applications using Google Maps satellite imagery. The following analysis is based entirely on information contained within the applicants’ own submitted planning drawings and is independently verifiable by An Coimisiún Pleanála by reference to those drawings.

The analysis reveals that proposed joint bay locations from the two separate applications are, in several instances, separated by distances of between 85 metres and 150 metres along the shared L7108 corridor. The following table sets out the specific proximities identified:

Gannow Ltd Joint Bay (MKO Drawings)	Bord Gáis Energy Joint Bay (TLI Group Drawings)	Measured Separation (Google Maps / Planning Drawings)	Significance
Joint Bay 01	Joint Bay 02	approximately 100m	Proposed locations effectively co-located within same road section
Joint Bay 04	Joint Bay 05	same proposed location	Both applications propose a joint bay at the same road location — physically impossible to accommodate both
Joint Bay 05	Joint Bay 06	approximately 85m	Closest measured proximity
Joint Bay 06	Joint Bay 07	approximately 150m	

Table: Joint bay proximity analysis — Gannow Ltd (MKO Drawings, Planning Ref. 2561412) vs. Bord Gáis Energy (TLI Group Drawings, ACP Case Ref. 324162). Separation distances measured from applicants’ own planning drawings using Google Maps satellite imagery.

The implications of the proximity data set out in Table 1 above are significant and have not been addressed in either application. Each 220kV joint bay structure is 8 metres long, 2.5 metres wide and 2.05 metres deep. At each joint bay location, the structure is accompanied by a Communication Chamber and an Earth Sheath Link Chamber, each of which is a further precast concrete structure installed below the road surface with an access hatch at finished road level. The combined underground concrete footprint at a single 220kV joint bay cluster therefore extends substantially beyond the 8-metre length of the joint bay itself.

At the locations identified in Table 1, the proposed joint bays from the two separate applications are separated by distances of between 85 metres and 150 metres. In the case of Gannow Joint Bay 04 and Bord Gáis Joint Bay 05, the two applications propose a joint bay at the same road location. This is not merely a proximity concern — it is a physical impossibility. Two separate 8-metre precast concrete joint bay structures, each requiring its own Communication Chamber and Earth Sheath Link Chamber, cannot occupy the same point in a narrow rural road. One or

both would need to be relocated. No assessment of how this conflict would be resolved has been provided in either application.

The Concern Group respectfully submits that the joint bay proximity data derived from the applicants' own planning drawings demonstrates, in concrete and measurable terms, that the cumulative underground infrastructure burden on the L7108 and L7109 has not been assessed. Two separate planning applications have independently designed joint bay layouts for the same stretch of constrained rural roads without any coordination, without any confirmation that the required structures can be physically accommodated alongside each other and alongside existing utilities, and without any assessment of the implications for road structure, drainage, maintenance access or long-term carriageway integrity.

The Concern Group further submits that An Coimisiún Pleanála cannot grant permission for this application in circumstances where the applicant's own engineers have acknowledged that a second cable system intends to use the same road corridor, where the joint bay infrastructure from both systems is shown on the respective planning drawings to be proposed at the same or near-identical locations, and where no coordinated infrastructure layout, no physical accommodation assessment, and no joint construction or sequencing plan has been submitted to the Board by either applicant.

5.5 No Coordinated Construction Programme — Two Sets of Full Road Closures on the Same Roads

The applicant's cumulative assessment acknowledges that the construction phases of the two projects may overlap. The Non-Technical Summary states that the cumulative assessment has been carried out on the basis of the assumption that construction phases would overlap. Notwithstanding this acknowledgement, no coordinated construction programme has been prepared, no combined traffic management plan has been submitted, and no assessment of the combined road closure burden on the affected communities has been provided in either application.

The consequence of overlapping construction programmes on the shared 2.2km section of the L7108, and on the converging section of the L7109, is that the same communities who face up to five and a half months of road closures for this application alone would face a second, fully independent construction programme involving its own excavation, joint bay installation, cable installation and resurfacing programme on the same roads. No assessment of the aggregate combined closure duration across both projects has been provided.

The Concern Group respectfully draws An Coimisiún Pleanála's attention to the following comparison, drawn from the available documentation:

- Bord Gáis 220kV cable construction on the L7108: 3 months main construction, 2 months resurfacing, 2 weeks commissioning — total approximately 5.5 months;
- Gannow 38kV cable on the L7108: based on Gannow's own Traffic Management Plan (EIAR Appendix 15-2), Section 11 of the L7108 alone requires 24 working days of closure, adding 5.9 kilometres of additional travel per trip;
- Combined potential closure burden on the shared 2.2km section of the L7108 from both projects: not assessed in either application.

The Concern Group respectfully submits that the failure to assess the combined construction impact on the L7108 and L7109 communities — particularly given that both construction programmes are acknowledged to potentially overlap — is a material deficiency in the cumulative impact assessment. It is not sufficient to assess each project in isolation and characterise the combined impact as short-term. The cumulative disruption to residents, agricultural users and emergency services from two overlapping full construction programmes on the same constrained roads has not been quantified or assessed.

5.6 An Internal Contradiction Within the Applicant's Own Assessment

The Concern Group respectfully draws An Coimisiún Pleanála's attention to a fundamental internal contradiction within the applicant's own documentation that affects the credibility and coherence of the cumulative assessment.

Technical Note 03 (Appendix 16.2) was prepared by TLI Group at the instruction of Bord Gáis Energy for the stated purpose of questioning the technical viability of the Gannow grid connection. The note concludes unambiguously:

"The application being sought by Gannow Ltd is technically unviable, as the designated connecting megawatt for a distribution (DSO) connection is circa 40MW-50MW. The Gannow renewable development will not have the option to connect at Cashla unfortunately given these constraints."

— Technical Note 03 (Appendix 16.2), TLI Group, January 2026, p.2

The note further states:

"At the Cashla substation facility, there are only two operational voltages. A primary voltage side 220kV and a secondary voltage side 110kV. Aside from these voltages, there is no other voltage potential at this substation node. There is currently no planned works to deep retrofit or reinforce this EirGrid node for Distribution connections."

— Technical Note 03 (Appendix 16.2), TLI Group, January 2026, p.2

The applicant therefore simultaneously:

- argues that the Gannow cable cannot technically connect at Cashla substation and that no grid connection agreement exists or will be made available to Gannow by ESB Networks;
- presents a cumulative assessment on the basis that both projects are assessed as if they will both be constructed and will share the same road corridor; and
- leaves entirely unresolved whether, if Gannow cannot connect at Cashla, the shared corridor assessment has any basis, and whether the roads would face a second construction programme at all.

The Concern Group respectfully submits that this internal contradiction undermines the integrity of the cumulative assessment. The EIAR cannot simultaneously contend that the Gannow connection is technically impossible and that a precautionary cumulative assessment of two overlapping construction programmes is adequate without addressing what happens in each scenario — including the scenario, apparently considered most likely by the applicant's own engineers, in which Gannow does not proceed.

If Gannow does not proceed, the shared corridor assessment is irrelevant, but the physical constraints of accommodating the 220kV cable alone in the L7108 remain. If Gannow does proceed — contrary to the applicant's own technical assessment — the cumulative construction, thermal, physical and traffic management conflicts identified above become operative and have not been resolved.

In either scenario, the cumulative assessment as presented does not provide An Coimisiún Pleanála with a sufficient basis to conclude that cumulative impacts will not be significant.

5.7 Physical Constraint of the Road

The Concern Group respectfully submits that a fundamental question arising from Technical Note 03 has not been answered in the EIAR: is there, in fact, sufficient physical space within the road curtilage of the L7108 to accommodate both cable systems at the required separation, alongside the existing utility services already present in the road corridor?

Technical Note 03 acknowledges that joint bay construction is constrained by the limited width of local roads, which prevents installation within the non-wheel-bearing strip without impacting traffic flow. The same document confirms that the cable route is installed within the centre median of the narrow road. The Construction Methodology Report confirms that the L7108 requires full road closure rather than stop-go working precisely because the road is too narrow to maintain a 3-metre clear running lane alongside the works.

A standard 220kV underground cable trench requires a minimum excavated width of 700mm, as shown in Figure 3 (Standard 220kV Trench Detail) of the Construction Methodology Report. A 38kV cable trench would require additional space. Both trenches must maintain separation from each other and from existing utilities. The thermal separation requirement identified in Technical Note 03 — the minimum horizontal distance required to prevent mutual overheating — has not been quantified. EirGrid standards for separation between high-voltage cable circuits typically require a minimum clear distance that, in a constrained rural road with existing utilities, may not be achievable without compromise.

The Concern Group respectfully submits that An Coimisiún Pleanála cannot be satisfied that both cable systems can be safely and practically accommodated within the road curtilage of the L7108 on the basis of the information before it. The applicant has not demonstrated that:

- sufficient physical space exists within the road cross-section to accommodate both cable systems at the required thermal and safety separations alongside existing utilities;
- the required horizontal separation has been quantified and confirmed as achievable within the road profile;
- the combined underground infrastructure burden of both cable systems, their joint bays and associated chambers, together with existing utilities, can be accommodated without compromising road structural integrity or future maintenance access; or
- an alternative alignment is available and consented for either cable system in the event that the required separation cannot be achieved within the road curtilage.

5.8 Overall Conclusions on Cumulative Infrastructure Impact

The Concern Group respectfully submits that the cumulative assessment of the interaction between the proposed 220kV Bord Gáis underground cable and the proposed 38kV Gannow underground cable, as presented in the EIAR and in Technical Note 03 (Appendix 16.2), is fundamentally inadequate and does not provide a sufficient basis upon which An Coimisiún Pleanála can be satisfied that cumulative impacts will not be significant.

Technical Note 03, prepared by the applicant's own engineers, confirms or acknowledges each of the following, none of which has been adequately resolved or assessed in the EIAR:

- A shared road corridor of 2.2km on the L7108 and a further converging section on the L7109, in roads already acknowledged to be too narrow for the 220kV cable works alone without full road closure;
- Mutual heating of both cable circuits as a potential consequence of proximity, with the required thermal separation not determined and deferred to detailed design;

- A minimum of four permanent underground joint bay structures within the shared 2.2km section of the L7108 from the two cable systems alone, on top of existing utilities, with no assessment of combined physical accommodation;
- No coordinated construction programme, no combined traffic management plan and no aggregate assessment of combined road closure impact on the communities of the affected townlands;
- A fundamental internal contradiction whereby the applicant simultaneously argues that the Gannow connection is technically impossible and presents a cumulative assessment premised on both projects proceeding; and
- No confirmation that sufficient space exists within the road curtilage of the L-7108 to accommodate both cable systems at the separations required by EirGrid standards and by the thermal independence requirements identified in the applicant's own Technical Note.

CROSS-REFERENCE: This chapter should be read in conjunction with the Traffic, Construction and Road Infrastructure chapter of this submission, and in particular with the sections addressing the Gannow comparison, the consolidated closure programme, and the diversion route circularity. The traffic and cumulative infrastructure impacts of the shared corridor are inseparable, and the failure to address them in an integrated and coordinated manner represents a single systemic deficiency in the EIAR that affects both chapters.

Accordingly, the Concern Group respectfully submits that the EIAR does not provide a sufficient or credible cumulative assessment of the interaction between these two proposed cable infrastructure projects, and that An Coimisiún Pleanála cannot be satisfied on the basis of the information before it that the cumulative impacts on the receiving road network, the affected communities and the long-term infrastructure of the townlands of Knocknacreeva, Caraunduff, Caherbriskaun and Lisheenkyle East will not be significant.

6 Archaeology, Cultural Heritage and Historic Landscape

6.1 Introduction

Chapter 13 of the Environmental Impact Assessment Report (EIAR), together with the supporting archaeological assessment and associated survey material, assesses the potential effects of the proposed development on archaeology, cultural heritage, historic landscape and heritage setting. The EIAR concludes that residual effects on cultural heritage will not be significant.

The Concern Group respectfully submits that the archaeological and cultural heritage assessment materially underestimates the sensitivity of the receiving environment and the cumulative implications of the proposed development.

The proposed development comprises substantial linear and permanent infrastructure extending through a historically sensitive rural landscape between Rathmorrissey and Cashla, including:

- the proposed 220kV underground cable corridor;
- extensive trenching and road-opening works;
- HDD crossings;
- the proposed substation compound;
- the proposed 36m telecommunications mast;
- permanent electrical infrastructure;
- and associated construction compounds, access works and excavation activity.

The receiving environment comprises an established historic agricultural landscape extending through Rathmorrissey, Pollnagroagh, Moanbaun, Castlélambert, Knocknacreeva, Caranduff, Caherbriskaun, Lisheenkye East, Barrettspark and Cashla. Chapter 13 identifies a substantial concentration of archaeological and cultural heritage features within this wider landscape, including recorded monuments, archaeological notification zones, vernacular heritage structures, historic landscape features and areas of archaeological potential.

While the EIAR addresses direct physical impacts on individual archaeological features, the Concern Group respectfully submits that insufficient assessment has been undertaken regarding:

- the wider archaeological landscape;
- archaeological setting and landscape continuity;
- cumulative corridor-scale impacts;
- the interaction between archaeology, landscape and visual impact;
- and the long-term implications of permanent infrastructure within the receiving environment.

The cumulative infrastructural transformation associated with the wider Cashla Peaker Project materially increases the sensitivity of the receiving environment.

This chapter should be read in conjunction with Chapter 12 (Landscape, Visual and Rural Character Impacts).

6.2 Archaeological Potential and Cultural Landscape Sensitivity

The EIAR confirms the presence of a substantial archaeological and cultural heritage resource within the wider study area. The baseline inventory identified in Chapter 13 includes:

- 70 sites of archaeological and/or cultural heritage significance;
- 28 Recorded Monuments and 8 Sites and Monuments Records;
- previous archaeological excavations;
- areas of archaeological potential identified through geophysical survey;
- vernacular heritage features;
- historic townland boundaries;
- and evidence of multi-period settlement activity.

The wider receiving environment includes ringforts, cashels, enclosure features, burial-related archaeology, vernacular structures and historic landscape elements across Castlelambert, Moanbaun and Rathmorrissy, including CH003–CH007, CH018–CH023 and CH035–CH036.

Of particular relevance to the proposed substation and underground cable corridor are:

- CH019 – Castle (Moanbaun – recorded medieval monument and archaeological notification zone crossed by the proposed underground cable corridor);
- CH020 – Earthwork (Moanbaun – recorded archaeological feature associated with a notification zone crossing);
- CH021 – Ring-Barrow (Moanbaun – prehistoric burial-related archaeological feature);
- CH022 – Standing Stone (Moanbaun – prehistoric ritual and landscape feature);
- CH023 – Ringfort-Cashel (Moanbaun – early medieval settlement feature);
- CH035 – Ringfort-Cashel (Rathmorrissy – early medieval fortified settlement feature);
- and CH036 – Ringfort-Rath (Rathmorrissy – excavated early medieval settlement site located approximately 100 metres west of the proposed substation area).

CH036 is of particular significance because previous archaeological excavation identified internal structures, pits, cobbled surfaces and human burials. These findings demonstrate confirmed archaeological activity and settlement continuity within close proximity to the proposed infrastructure.

The archaeological record identified in Chapter 13 demonstrates that the receiving environment comprises a historically sensitive and archaeologically active rural landscape associated with long-established settlement activity, agriculture and subsurface archaeological potential.

The EIAR also identifies vernacular heritage and historic landscape features associated with the route corridor, including:

- CH046 – Historic Townland Boundary Feature (Rathmorrissy/Pollnagroagh boundary area);
- CH057 – Vernacular Heritage Structure (Pollnagroagh);
- CH058 – Historic Townland Boundary Feature (Pollnagroagh);
- CH059 – Vernacular Heritage Structure (Lisheenkyle East);
- CH060 – Historic Landscape Feature (Barrettspark);
- and CH061 – Historic Boundary Feature (Cashla).

These features contribute to the wider historic agricultural landscape and landscape continuity of the receiving environment.

The EIAR further identifies multiple areas of archaeological potential arising from geophysical survey investigation (CH047–CH055), together with an additional area of archaeological potential associated with natural features (CH056). These anomalies further demonstrate the likelihood that subsurface archaeological material may survive beyond currently recorded monument boundaries within the wider route corridor.

The Concern Group respectfully submits that archaeological sensitivity is further reinforced by the extent to which the EIAR relies upon construction-stage archaeological monitoring and mitigation rather than comprehensive pre-construction investigation along the full underground cable corridor.

Particular concern arises regarding:

- the limited extent of investigative trenching undertaken along the cable corridor;
- the acknowledged presence of archaeological notification zones and geophysical anomalies within close proximity to the route;
- and the risk that previously unidentified archaeological material may only be identified during active excavation works after substantial ground disturbance has already occurred.

Historic cartographic analysis presented within Chapter 13 further indicates that the receiving environment has undergone progressive drainage, enclosure and landscape modification over time. Historical aerial imagery and visual evidence contained within Appendix C of this submission demonstrate additional landscape alteration, vegetation clearance and drainage activity within the wider receiving environment.

These changes are material in the context of archaeological assessment because they introduce uncertainty regarding the condition, visibility and distribution of potential subsurface remains.

This is particularly relevant given that the EIAR itself identifies fulachta fiadh within wetland areas approximately 600 metres south-west of the site, demonstrating that wet and marginal land may retain archaeological significance and should not automatically be treated as archaeologically sterile.

Plate 12 of Chapter 13 illustrates historic townland boundary features associated with CH046 and the wider agricultural landscape traversed by the proposed infrastructure corridor. Chapter 13 further acknowledges that the proposed development would give rise to indirect effects on this historic landscape feature.

The EIAR also recognises that the historical place names associated with Rathmorrissy, Pollnagroagh, Moanbaun, Castlélambert and surrounding townlands form part of the wider cultural identity of the receiving environment. Chapter 13 additionally references intangible heritage and Irish Folklore Commission material associated with the wider landscape.

Taken together, the archaeological and cultural heritage material presented within Chapter 13 indicates a historically layered and archaeologically sensitive rural landscape extending across the wider route corridor toward Cashla.

6.3 Underground Cable Corridor and Construction Impacts

The proposed 220kV underground cable corridor extends approximately 8.1km from the proposed substation area toward the existing Cashla substation and traverses multiple rural townlands, public roads and adjoining lands.

The proposed works involve substantial linear excavation, road-opening operations, HDD crossings and associated ground disturbance across the wider receiving environment.

The EIAR confirms that the proposed underground cable corridor would utilise Horizontal Directional Drilling (HDD) beneath the M6 motorway in two locations and beneath the M17 motorway in one location.

While HDD is presented as a reduced-impact methodology, the EIAR acknowledges that HDD operations require launch and exit pits and may give rise to direct physical effects on potential subsurface archaeological remains.

The EIAR further confirms that HDD works associated with CH059 (Lisheenkyle East – Vernacular Heritage Structure) may directly affect previously unidentified subsurface archaeology.

The proposed underground cable corridor also crosses statutory archaeological notification zones associated with:

- CH019 – Castle (Moanbaun);
- and CH020 – Earthwork (Moanbaun).

These crossings demonstrate direct interaction between the proposed infrastructure works and protected archaeological areas.

The route corridor additionally passes through a wider archaeologically sensitive landscape containing multiple recorded monuments, vernacular heritage features and areas of archaeological potential.

Particular concern arises regarding:

- the extent of trenching and excavation works across historically sensitive landscapes;
- the potential for previously unidentified subsurface archaeology beyond recorded monument boundaries;
- the interaction between HDD works and vernacular heritage features;
- and the cumulative impact of linear excavation works across the wider receiving environment.

The archaeological assessment confirms that twenty-five test trenches were excavated within the proposed substation area, while only four additional trenches were undertaken along the associated underground cable corridor.

Given the scale of the proposed 8.1km route corridor and the extent of trenching and road-opening works proposed, the level of investigative trenching undertaken along the cable route does not appear proportionate to the archaeological sensitivity of the receiving environment. The scale of the proposed trenching corridor therefore materially exceeds the extent of direct archaeological investigation undertaken prior to application.

The EIAR further confirms that proposed access and associated groundworks within Pollnagroagh would directly affect CH057 (Pollnagroagh – Vernacular Heritage Structure), including areas not fully subject to prior archaeological investigation before submission.

While portions of the route corridor associated with CH058 were previously investigated under excavation reference CH038, previous excavation elsewhere along the corridor does not remove archaeological uncertainty across the wider route corridor extending toward Cashla.

The archaeological implications of the proposed underground cable corridor therefore extend beyond isolated recorded monuments and include cumulative interaction between trenching works, HDD crossings, access infrastructure, vernacular heritage features and the wider archaeological landscape traversed by the route corridor.

6.4 Substation, Telecommunications Mast and Permanent Infrastructure

The proposed development includes permanent above-ground infrastructure comprising:

- a proposed 220kV substation compound;
- a 36m telecommunications mast;
- security fencing and lighting;
- and associated electrical infrastructure and access works.

These elements would introduce substantial permanent infrastructure into a predominantly agricultural and archaeologically sensitive rural landscape.

The proposed substation and telecommunications mast must also be assessed in conjunction with the wider visual, infrastructural and landscape transformation associated with ACP Ref. 324113.

Chapter 13 confirms that the receiving environment contains a concentration of archaeological and cultural heritage features within the wider landscape surrounding the proposed development, including ringforts, cashels, enclosure features, standing stones and burial-related archaeology within Rathmorrissy, Castlelambert and Moanbaun.

The EIAR further identifies visibility and setting interaction between the proposed infrastructure and archaeological features within the wider receiving environment.

The proposed telecommunications mast is of particular concern due to its height and visual prominence within the landscape. The proposed substation compound, lighting infrastructure and associated permanent electrical infrastructure would also introduce a substantial industrial character into the surrounding rural environment.

These effects are relevant not only from a landscape perspective, but also in terms of archaeological setting and cultural landscape character.

Ringforts and associated archaeological features were historically positioned within visually prominent locations associated with settlement activity, agricultural control and landscape visibility. The introduction of visually prominent electrical infrastructure therefore has the potential to alter the setting and appreciation of the wider archaeological landscape.

The proposed substation and telecommunications mast cannot be considered in isolation from the wider industrial infrastructure associated with the overall Cashla project. Taken together, the proposed substation, telecommunications mast, underground cable corridor and associated infrastructure would contribute to the long-term industrialisation and landscape transformation of a historically agricultural rural environment extending from Rathmorrissy toward Cashla.

6.5 Policy Context and Heritage Protection

Chapter 13 of the EIAR acknowledges that the archaeological and cultural heritage assessment must be considered in the context of:

- the Galway County Development Plan 2022–2028;
- the National Monuments Acts 1930–2014;
- and the Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023.

Relevant policies of the Galway County Development Plan include:

- ARC 4 – Protection of Archaeological Sites;
- ARC 9 – Recorded Monuments;
- ARC 10 – Zones of Archaeological Potential;
- and ARC 12 – Archaeology and Infrastructure Schemes.

These policies emphasise the protection of archaeological monuments, archaeological settings, archaeological landscapes, visual amenity and subsurface archaeological potential.

The proposed development directly engages these policies due to:

- the extent of underground trenching and excavation works;
- the crossing of archaeological notification zones;
- the archaeological sensitivity of the receiving environment;
- the proposed substation and telecommunications infrastructure;
- and the cumulative impact of permanent infrastructure across the wider route corridor.

The Concern Group respectfully submits that the application documentation does not adequately demonstrate that the archaeological, cultural heritage and landscape implications of the proposed development have been fully identified or assessed at corridor-scale and landscape-scale level.

6.6 Assessment Methodology and Deficiencies

The Concern Group respectfully submits that the archaeological and cultural heritage assessment presented in Chapter 13 contains a number of methodological limitations.

The assessment focuses primarily on direct physical impacts on individual archaeological features and does not adequately assess:

- the wider archaeological landscape;
- archaeological setting and landscape continuity;
- cumulative corridor-scale impacts;
- the interaction between archaeology, landscape and visual impact;
- or the long-term operational impact of permanent infrastructure within the receiving environment.

The archaeological assessment confirms that twenty-five test trenches were excavated within the proposed substation area, while only four additional trenches were undertaken along the underground cable corridor.

Given the scale of the proposed 8.1km underground cable route extending across multiple historically sensitive rural townlands, significant uncertainty remains regarding:

- the extent of subsurface archaeological potential along the route corridor;
- the adequacy of pre-construction archaeological investigation;
- and the reliability of conclusions regarding residual archaeological effects;
- the implications of potential detailed-design modifications to sections of the underground cable alignment;

The EIAR also relies substantially on archaeological monitoring during construction as a mitigation measure.

The Concern Group respectfully submits that archaeological monitoring records archaeological impact after it occurs and should not be treated as a substitute for robust pre-construction archaeological investigation where substantial trenching, HDD crossings and excavation works are proposed.

This is particularly relevant in areas associated with CH057 and CH059 where the EIAR acknowledges potential effects on vernacular heritage features and previously unidentified subsurface archaeology.

The EIAR further states that no further mitigation is required within the proposed substation footprint following test excavation works. However, this conclusion does not resolve archaeological uncertainty arising across the wider route corridor toward Cashla.

The archaeological implications of the proposed development are also not confined solely to the construction phase. Future maintenance, upgrade and eventual decommissioning works may involve renewed excavation and ground disturbance within a historically sensitive landscape.

Taken together, these issues indicate that the archaeological baseline for the wider infrastructure corridor has not been established to a level proportionate to the scale and extent of the proposed development.

6.7 Conclusion

The proposed development traverses a historically sensitive rural landscape characterised by long-established settlement activity, archaeological features, historic field systems and vernacular heritage extending from Rathmorrissy toward Cashla.

Chapter 13 of the EIAR identifies a substantial concentration of archaeological and cultural heritage features within the wider receiving environment, including recorded monuments, archaeological notification zones, ringforts, enclosure features, standing stones, burial-related archaeology and vernacular heritage features.

Particular archaeological sensitivity arises in relation to:

- CH019 and CH020 within Moanbaun;
- CH021–CH023 within the wider Moanbaun archaeological landscape;
- CH035 and CH036 within Rathmorrissy;
- and CH057–CH061 along the wider route corridor.

The proposed underground cable corridor would involve extensive trenching, HDD crossings, road-opening operations and associated excavation works across multiple historically sensitive townlands.

The EIAR itself acknowledges the potential for direct and indirect effects on archaeological notification zones, vernacular heritage features and previously unidentified subsurface archaeology.

While test excavation was undertaken within the proposed substation area, the level of investigative trenching undertaken along the wider underground cable corridor remains limited having regard to the scale of the proposed infrastructure works.

The proposed substation, telecommunications mast and associated permanent infrastructure would also introduce a substantial industrial and visual presence into a historically agricultural and archaeologically sensitive rural landscape.

The archaeological and cultural heritage implications of the proposed development therefore extend beyond isolated recorded monuments and include wider impacts on archaeological setting, landscape continuity and historic rural character.

The cumulative interaction between the proposed grid infrastructure and the wider Cashla Peaker Project materially increases the overall heritage and landscape sensitivity of the receiving environment.

Accordingly, the Concern Group respectfully submits that the available information does not provide a sufficiently robust basis upon which An Coimisiún Pleanála can conclude that likely significant effects on archaeology, cultural heritage and historic landscape character have been fully identified, assessed or mitigated.

7 Biodiversity, Ecology and Natural Environment

7.1 Introduction

This chapter addresses the biodiversity, ecological and natural environment implications of the proposed 220kV underground grid connection infrastructure, associated substation development and related construction works forming part of the wider Cashla Peaker Project.

This chapter should be read in conjunction with:

- Chapter 8 (Hydrology, Groundwater, Karst Geology and Water Environment);
- Chapter 10 (Pollution, Noise and Environmental Risk);
- Chapter 1 (Lighting and Night-Time Impacts);
- Chapter 12 (Landscape, Visual and Rural Character Impacts); and
- Chapter 13 (Residential Amenity and Community Impacts).

The Concern Group respectfully submits that the proposed development gives rise to significant concerns regarding potential impacts on biodiversity, ecology and the natural environment arising from extensive trenching and excavation works; road-opening and reinstatement operations; habitat disturbance and fragmentation; hydrological and groundwater interaction; permanent electrical infrastructure development; lighting and operational disturbance; and the cumulative impacts associated with the wider Cashla Peaker Project and associated infrastructure.

The proposed underground cable corridor traverses an established rural environment characterised by agricultural lands, hedgerows, roadside vegetation, drainage ditches, ecological corridors and interconnected habitat networks supporting wildlife movement and biodiversity connectivity throughout the wider landscape. The cable route extends **8.1**

kilometres along the **L7108 (Lisheenkyle East), L7109 and L3103** roads — narrow country lanes bordered by mature trees and hedgerows on private land on both sides for much of their length.

The EIAR (Volume 2, Chapter 5) confirms that the receiving environment is characterised by agricultural grassland, hedgerows (WL1), treelines (WL2), drainage features, roadside vegetation and modified agricultural habitats. The EIAR's own ecological evaluation (**Table 5-11, EIAR Volume 2, p.280**) formally rates Hedgerow (WL1) and Treeline (WL2) as "**Local Importance (Higher Value)**" because they provide "*significant foraging/roosting/commuting habitat for species such as birds and bats.*" Notwithstanding this assessment, the EIAR subsequently describes the grid connection route as comprising roads of negligible ecological value, dismissing the mature trees and hedgerows on private lands flanking those roads entirely.

The receiving environment is further characterised by karst limestone geology, shallow bedrock conditions and hydrological connectivity, as addressed in Chapter 8. The Concern Group respectfully submits that these environmental conditions increase the ecological sensitivity of the receiving environment and heighten the potential for indirect ecological effects associated with trenching, excavation, drilling operations, groundwater interaction and long-term infrastructure development.

The Concern Group respectfully submits that the EIAR and supporting ecological documentation do not adequately assess the full extent of likely biodiversity, habitat connectivity and ecological impacts arising from the proposed development — in particular along the 8.1 km underground cable corridor — and do not meet the standard of a complete, precise and definitive assessment required under the EIA Directive and established in case law including *Sweetman v An Bord Pleanála* [2014] and *Holohan v An Bord Pleanála* [2018].

7.2 Adequacy of Ecological Surveys and Assessment

The Concern Group respectfully submits that the ecological surveys underpinning the EIAR are materially deficient in their scope, duration and spatial coverage, and that the conclusions of the biodiversity assessment are not adequately supported by the survey data provided.

7.2.1 Survey Scope — Cable Route Not Surveyed

The bat activity survey, bird survey and tree survey were conducted at or near the Rathmorrisy main site. None of the three specialist ecological surveys was designed to characterise the baseline ecological conditions along the **8.1 km cable route corridor** itself — the section of the project that will give rise to the most extensive and prolonged ecological disturbance.

The Concern Group respectfully submits that ecological survey effort and assessment appear to have been focused primarily upon the proposed generating station site and associated permanent infrastructure areas, while comparatively limited assessment appears to have been undertaken regarding the full extent of ecological interaction arising along the proposed underground cable corridor and associated construction footprint.

Particular concern arises regarding the extent to which trenching, vegetation clearance, HDD operations, temporary access works and prolonged construction activity may affect trees, hedgerows, bat foraging corridors, nesting birds, mammals, invasive species pathways, surface water interaction and groundwater-dependent karst-linked ecological receptors throughout the wider receiving environment.

The Concern Group respectfully submits that the route-wide ecological implications of the proposed underground cable infrastructure require a level of ecological assessment and scrutiny proportionate to the scale and duration of the proposed works.

The Concern Group further submits that insufficient information has been provided regarding the extent to which trench excavation, reinstatement works and associated construction activity may result in severance of tree root systems, disturbance of root protection areas and long-term impacts on the stability and condition of established roadside trees and hedgerows throughout constrained sections of the route corridor. In the absence of accurately plotted tree locations and detailed route-specific arboricultural assessment, uncertainty remains regarding potential long-term vegetation decline, roadside safety implications, hedgerow degradation and adverse effects on established ecological corridors within the receiving environment.



Figure 7.1: Mature roadside tree and established hedgerow corridor along the proposed grid connection route, illustrating the ecological sensitivity, habitat connectivity and constrained roadside environment potentially affected by trench excavation, root disturbance and associated construction activity.

Bat survey: Four static Songmeter detectors were deployed on the main site only, between 4 June and 17 June 2025 (**13 nights**). No static detectors were placed along the L7108, L7109 or L3103 roads. No bat transect surveys were conducted along the cable route corridor. Best practice under the *Bat Conservation Trust Guidelines (2023)* requires survey coverage across the full May to September activity season; a 13-night window in June represents a short-duration snapshot incapable of characterising commuting routes, roost locations or seasonal variation in bat activity along the full route.

Bird survey: Survey transects were based on the footprint and surrounding environs of the proposed Peaker plant. No ornithological survey was undertaken of the 8.1 km cable route road corridors or the adjacent hedgerows and treelines in private ownership. Breeding bird surveys were conducted on 2 May, 23 May and 26 June 2025 only, with no coverage during March, April, July or August — a survey window that does not capture the full breeding season between March and August.

Tree survey: The survey by *Independent Tree Surveys Ltd* (October 2025) is conducted to BS5837:2012, a standard designed for development sites, not linear infrastructure projects. The surveyor acknowledges that:

"Trees and groups of trees located along the road route of the proposed cable are not plotted by topographic survey methods and so their positions on the survey drawings should be regarded as indicative only."

(Appendix 5.3, pp.1–2). An impact assessment based on indicative tree positions is incapable of accurately assessing root protection area (RPA) overlap with the proposed trench line.

7.2.2 Survey Duration — Bat Activity Survey

The bat survey was conducted over 13 consecutive nights in June 2025. The EIAR (Volume 2, Section 5.2.2.2) acknowledges that best practice recommends a minimum of five consecutive nights but does not address the requirement for seasonal coverage. A June-only survey does not capture:

- spring commuting and emergence activity (April–May);
- late-season foraging behaviour (August–September);
- variation in activity associated with different weather conditions; or
- roost switching behaviour relevant to assessing bat roost risk in trees.

In circumstances where six bat species were confirmed on site — including **Leisler's bat**, a species of national conservation concern — a 13-night survey in a single month does not provide the scientific certainty required to characterise baseline bat activity or assess impact on bat populations along an 8.1 km road corridor.

7.2.3 Legal Standard — EIA Directive and Case Law

In *Sweetman v An Bord Pleanála* [2014] EUECJ C-258/11, concerning Article 6 of the Habitats Directive, the Court of Justice confirmed that where reasonable scientific doubt remains regarding ecological impacts, a competent authority cannot conclude that a development will not adversely affect protected species or habitats.

In *Holohan v An Bord Pleanála* [2018] EUECJ C-461/17, the Court confirmed that an EIA must identify, describe and assess all significant effects on the environment in a complete, precise and definitive manner.

The Concern Group respectfully submits that the ecological surveys as presented do not provide a sufficient evidential basis to reach the conclusions stated in the EIAR. Where survey scope is acknowledged as limited, where survey duration falls below best practice, and where

the spatial coverage of surveys does not encompass the principal area of construction disturbance, the required standard of scientific certainty has not been met.

The Concern Group further submits that substantial reliance upon contractor-led Construction Environmental Management Plans, construction-stage ecological monitoring and deferred mitigation measures cannot substitute for adequate baseline ecological assessment or resolve uncertainty regarding likely significant environmental effects at the time of determination. The requirement for contractors to subsequently develop, implement and maintain elements of the ecological management framework indicates that material aspects of ecological impact management remain unresolved within the EIAR itself, notwithstanding the identified hydrogeological and ecological pathways to the Galway Bay Complex SAC and associated European sites.

7.3 Habitats, Hedgerows and Ecological Corridors

7.3.1 The Applicant's Internal Contradiction

The EIAR's own ecological evaluation (Table 5-11, EIAR Volume 2, p.280) formally classifies Hedgerow (WL1) and Treeline (WL2) habitats as **"Local Importance (Higher Value)"** on the basis that they provide significant foraging, roosting and commuting habitat for bats and birds. This classification applies equally to the hedgerows and treelines flanking the L7108, L7109 and L3103 roads.

However, Section 5.4.2.7.4 of the EIAR (p.280) states that the grid connection route *"provides no habitat for any birds"* because it follows tarmac roads. Section 5.5.4.2.1 (p.290) concludes that root damage to roadside trees *"does not constitute a significant negative impact."* These conclusions directly contradict the applicant's own higher-level habitat evaluation and are not consistent with an objective assessment of the ecological value of the receiving environment.

The Concern Group respectfully submits that the applicant has assessed the cable route road surface (BL3 — building and artificial surfaces, of negligible ecological value) while ignoring the mature trees, hedgerows and boundary vegetation on private land flanking those roads — features which the EIAR itself classifies as Higher Value habitat. This approach fundamentally mischaracterises the ecological nature of the cable route corridor.

Reference is also made to Appendix F, which summarises National Biodiversity Data Centre species records within a 10km radius of Rathmorrissey and further demonstrates the ecological sensitivity of the wider receiving environment, including the presence of protected species and established ecological commuting and connectivity corridors associated with hedgerows, treelines and drainage features.

7.3.2 Hedgerow Loss — Confirmed Removals and Root Severance Risk

The EIAR (Section 5.5.4.2, p.290) confirms that the proposed works will result in the removal of **72.5 metres of stone wall including 49.2 metres of hedgerow** to facilitate construction of the new access road. The EIAR acknowledges that this loss, *"in the absence of mitigation, is considered a permanent significant negative impact at the local scale."*

Specific confirmed removals include:

- **Group G2 (15 m section):** mature treeline along the northern boundary, removed for the new access road junction with the L3103.
- **Group G4 (~45 Hawthorn bushes):** continuous hedgerow feature along the old field boundary wall northeast of the site, confirmed for removal for the access road and new fencing.
- **Group G5 and trees T667–T670:** cluster of small trees and bushes removed for access road layout.
- **Unnamed roadside trees at L3103 junction:** one Ash sapling and two Hawthorn bushes on the roadside, potential removal required for sightlines.

Beyond these confirmed removals, the EIAR (Section 5.5.4.2.1, p.290) acknowledges **12 instances of trees or tree groups** along the cable route road corridor where roots have the potential to spread beneath the carriageway and be damaged during trenching. Species at risk include: Ash, Beech, Elder, Sycamore, Wych Elm, Hawthorn, Leyland Cypress, Lime, Pedunculate Oak, Italian Alder, Scots Pine, Sitka Spruce, Lawson Cypress and Horse Chestnut.

The EIAR dismisses the ecological significance of potential root damage to these 12 instances on the grounds that most trees are of low arboricultural condition.

The Concern Group respectfully submits that this assessment is fundamentally flawed: arboricultural condition and ecological value are not the same thing. Even structurally compromised or diseased trees provide foraging, roosting, nesting and commuting habitat for bats, nesting habitat for birds, and connectivity function within the wider hedgerow network. The use of BS5837:2012 arboricultural categories — designed to assess trees for retention in development sites — to dismiss the ecological significance of root severance is methodologically inappropriate as the primary basis for assessing ecological significance within a linear infrastructure corridor.

The tree survey itself acknowledges that *"there is no realistic scope for the retention of any tree roots extending across the trench should they be found"* (Section 8.2.2, Appendix 5.3). This is an admission of pre-accepted ecological damage — not a precautionary approach consistent with the requirements of the EIA Directive.

The Concern Group further notes that established motorway corridor planting associated with the M17/M18 infrastructure now forms part of the wider ecological corridor network within the receiving environment.

While originally installed as motorway mitigation planting, approximately 17 years of establishment and growth has resulted in the development of mature linear vegetation corridors providing habitat connectivity, ecological screening, foraging opportunities and shelter for birds, bats and other species within the wider rural landscape.

The Concern Group respectfully submits that removal, fragmentation or disturbance of these established planting corridors during construction activity may therefore give rise to ecological effects materially greater than would normally be associated with recently established landscaping or temporary mitigation planting.

Particular concern arises regarding the cumulative interaction between hedgerow loss, root disturbance, temporary compound works, HDD crossing areas and fragmentation of existing vegetation corridors within an already infrastructure-constrained receiving environment.

7.3.3 Trees on Private Land — Unassessed Third-Party Impacts

The trees flanking the L7108, L7109 and L3103 roads are not within the road curtilage — they are in private ownership on land adjoining the public road. The NIS (AtkinsRealis, February 2026, p.28) acknowledges *"the removal of several trees (located on private lands) to achieve sightlines,"* but does not demonstrate that:

- affected landowners have been consulted regarding impacts on their trees and hedgerows;
- those landowners have consented to root zone disturbance or tree removal;
- the legal and financial implications for third-party landowners arising from root severance, tree decline and potential liability for subsequent tree failure have been assessed; or
- the rights of private landowners under property law and planning legislation have been adequately considered.

The Concern Group respectfully submits that the failure to address the impact of trenching works on privately owned trees and hedgerows represents a material gap in the EIAR.

7.3.4 Mitigation — Replanting is Inadequate

The EIAR proposes landscape replanting as the primary mitigation measure for the loss of hedgerow and vegetation along the cable route and main site. The monitoring commitment

extends to inspections **every six months for two years** following completion of planting (EIAR Volume 2, Section 5.7.2, p.298; NTS Section 5.3.2).

The Concern Group respectfully submits that a two-year monitoring window is wholly disproportionate to the ecological recovery timescale. Established hedgerows and mature trees take **decades** to develop the structural complexity, canopy cover and root systems that provide equivalent ecological function to those being removed or damaged. During this extended establishment period:

- bat commuting corridors will remain disrupted;
- breeding bird habitat will remain diminished;
- ecological connectivity within the wider rural network will be reduced; and
- the landscape screening and boundary function of removed vegetation will not be restored.

The residual impact characterisation — that the overall habitat impact will be "*permanent significant positive*" due to landscaping — relies entirely on the establishment of replacement planting over a multi-decade period. This conclusion does not adequately account for the prolonged interim period during which acknowledged significant negative impacts on bats, birds and habitat connectivity will persist.

7.4 Bats — Protected Species and Inadequate Assessment

7.4.1 Species Confirmed and Legal Protections

The bat survey confirmed **six bat species foraging on or near the site**: Soprano pipistrelle, Common pipistrelle, Nathusius' pipistrelle, Leisler's bat, Whiskered bat and Brown long-eared bat. All bat species are **strictly protected** under:

- *Wildlife Act 1976* (as amended), Sections 22 and 23;
- the *European Communities (Birds and Natural Habitats) Regulations 2011* (S.I. No. 477/2011), implementing Annex IV of the EU Habitats Directive.

Disturbance, injury, killing or obstruction of a bat roost — whether or not occupied at the time — constitutes a criminal offence. **Leisler's bat** (*Nyctalus leisleri*) is a species of national conservation concern in Ireland.

7.4.2 Bat Activity — What the Survey Found

The highest bat activity recorded across the entire site was at **Songmeter 3 (SM3)** — positioned under the mature treeline on the northeastern boundary — with 4,339 total calls recorded over 13 nights and an average of 120 Leisler's bat calls per night. The bat report (Appendix 5.2)

confirms that this treeline provides *"ideal foraging conditions for bats due to the shelter provided by the trees and the abundance of insects"* and that the trees contain **crevices suitable as bat roosting sites**.

The EIAR (Section 5.5.4.4.1, p.291) itself acknowledges that *"the loss of linear habitats such as hedgerow/stone wall will reduce the connectivity for bats within the Site, impacting commuting (and ultimately foraging) habits"* and that this represents **"a permanent significant negative impact at the local scale"** in the absence of mitigation.

The wider ecological sensitivity of the receiving environment is further reflected within Appendix F, which identifies multiple protected bat species and ecological connectivity corridors within the wider Rathmorrissy landscape.

7.4.3 Bat Roost Surveys — A Deferred Legal Obligation

No roost emergence or re-entry surveys were conducted on any trees identified as having bat roost potential. The bat survey report confirms that crevices were *"clearly visible from ground level"* in the Ash and Sycamore trees on the northeastern boundary. Photographic evidence in the bat report (Photo 9) further confirms a Hawthorn tree with *"crevices suitable for bats"* along the cable route boundary.

Critically, the EIAR (Section 5.5.4.4.2, p.291) contains the following admission:

"If it in the future it becomes necessary to remove any diseased trees, a bat roost survey will be required prior to removal." The Concern Group respectfully submits that this passage demonstrates three things:

- The applicant acknowledges that bat roost surveys are a **legal requirement** before felling trees with roost potential;
- The Ash trees — which the arborist's own report recommends should be *"coppiced or felled if crown dieback approaches or exceeds 50% of crown volume"* — are the same trees identified as having bat roost potential; and
- This legal obligation has been deferred to a future post-permission stage rather than discharged as part of the planning application.

The Concern Group respectfully submits that deferring roost surveys to a post-permission stage is not consistent with the requirements of the EIA Directive, which requires that impacts be identified and assessed before consent is granted — not after. The absence of roost emergence/re-entry surveys on trees with confirmed roost potential represents a material deficiency in the ecological assessment.

7.4.4 Cable Route — No Bat Survey Undertaken

No bat surveys of any kind were conducted along the L7108, L7109 or L3103 road corridors. These narrow rural roads, flanked by hedgerows and mature boundary trees, constitute precisely the linear landscape features that bats use as commuting corridors. The EIAR characterises the grid connection route as road surface of negligible ecological value — an assessment that ignores the function of flanking vegetation as bat habitat entirely.

The Concern Group respectfully submits that the absence of baseline bat data for the 8.1 km cable route corridor means that the EIAR cannot reliably characterise the pre-construction bat activity baseline, cannot assess the impact of trenching on bat commuting and foraging corridors, and cannot demonstrate that proposed mitigation measures are adequate to offset the acknowledged loss of bat commuting habitat.

7.4.5 Operational Lighting — Permanent Significant Negative Impact

The NTS (Section 5.2.3) acknowledges that lighting disturbance to bats during the operational phase represents **"a permanent significant negative impact at the local scale."** The EIAR proposes 2700K warm-spectrum LED lighting and a design criterion of less than 1 lux at the field boundary as mitigation measures.

The Concern Group respectfully submits that no species-specific bat lighting assessment has been provided. The adequacy of a 1 lux boundary criterion has not been evidenced by reference to the six confirmed bat species on site, several of which — including Leisler's bat and Brown long-eared bat — are known to be sensitive to artificial light. Furthermore, the interaction between permanent operational lighting, the loss of bat foraging habitat through tree and hedgerow removal, and construction disturbance has not been assessed cumulatively.

Particular regard should also be had to the ecological commuting and connectivity corridors identified within Appendix F, including the sensitivity of bat commuting and foraging behaviour to artificial illumination, habitat fragmentation and lighting overspill within the wider rural landscape.

7.5 Red and Amber-Listed Species

7.5.1 Wintering Species of Conservation Concern

The wintering bird survey (Delichon Ecology Ltd, December 2024 – February 2025) recorded the following species of conservation concern using the site and its environs:

- **Golden Plover** (*Pluvialis apricaria*) — Red List / Annex 1 EU Birds Directive: A flock of 46 birds was recorded in January 2025 grazing improved grassland north of the

proposed access road. As an Annex 1 species, the Golden Plover receives the highest level of protection under European law. The survey characterises this flock as likely passing through; however, no assessment has been provided of the impact of construction disturbance, including six months of full road closure and heavy machinery operation, on the continued use of this habitat by this species.

- **Snipe** (*Gallinago gallinago*) — Red List: Recorded within the Peaker plant footprint and north of the site. No species-specific mitigation is proposed for Snipe during the construction phase.
- **Mallard** (*Anas platyrhynchos*) — Amber List: Recorded using two groundwater-fed circular ponds approximately 260 metres west of the proposed access road — identified by the surveyor as the highest quality wintering bird habitat in the entire study area. Construction phase disturbance impacts on these ponds have not been assessed.

7.5.2 Breeding Species — Amber-Listed Birds in Affected Habitat

The breeding bird survey recorded **seven Amber-listed breeding species** confirmed as singing or foraging within or along the linear woodland fringing the site — the same habitat feature that is partially removed by the proposed development:

- Willow Warbler — Amber
- Greenfinch — Amber
- Starling — Amber
- Swallow — Amber
- Sand Martin — Amber
- House Martin — Amber
- Goldcrest — Amber

The EIAR (Section 5.5.4.5, p.291) characterises the loss of breeding bird habitat as "*a permanent non-significant negative impact at the local scale.*"

The Concern Group respectfully submits that this conclusion is not supported by the survey data, which demonstrates that seven Amber-listed breeding species actively use the habitat features that will be partially removed or disturbed. The characterisation of this impact as non-significant requires explanation and justification that is not provided in the EIAR.

The Concern Group further notes that the NTS (Section 5.2.1) acknowledges that, in the absence of the development, the site's value for birds and bats would continue to exist "*assuming that no linear features, such as treelines, hedgerows and stonewalls were removed from the proposed Peaker plant site.*" The applicant then proposes to remove exactly those features and characterises the resulting impacts as non-significant. This is an internal contradiction that the EIAR does not resolve.

7.5.3 Survey Adequacy — Breeding Season Coverage

Breeding bird surveys were conducted on three dates: 2 May, 23 May and 26 June 2025. The recognised breeding bird season extends from **1 March to 31 August**. The absence of survey visits in March, April, July and August means that early and late-season breeding activity — including early nesters such as Mistle Thrush and late-season migrants such as Willow Warbler — was not adequately captured. This is particularly significant given the Amber-listed species recorded, whose territory establishment and nesting cycles extend across the full season.

7.6 Karst Ecology and Groundwater-Dependent Habitats

The receiving environment is characterised by karst limestone geology, shallow bedrock and interconnected groundwater pathways. The applicant's own engineering documentation confirms fractured and fissured rock conditions with groundwater vulnerability throughout the cable route corridor.

The EIAR identifies a groundwater-dependent pond (FL3/FL6) within the study area and adopts the precautionary principle in assuming the presence of smooth newt (*Lissotriton vulgaris*) in areas of surface water ponding adjacent to the project boundary. The smooth newt survey was conducted on 1 July 2025 — outside the recognised breeding season of February to May — which the Concern Group submits is insufficient to determine presence or absence.

The Concern Group respectfully submits that trenching, excavation and HDD operations within a karst environment have the potential to alter subsurface drainage pathways, disturb groundwater-dependent habitats, and create indirect ecological effects extending beyond the immediate construction corridor. These interactions have not been adequately assessed within the EIAR. Detailed hydrological and groundwater matters are addressed in Chapter 8.

7.7 Construction Disturbance, Mammal Entrapment and Invasive Species Risk

The NTS (Section 5.2.2) identifies **mammal entrapment in excavations as a potential permanent significant negative impact at the local scale**. The proposed mitigation — a camera trap survey at the identified fox den — does not address entrapment risk along the full 8.1 km open cable trench, which will require prolonged excavation across multiple townlands. No assessment has been provided of entrapment risks to badger (*Meles meles*, a protected species under S.I. 477/2011) or other mammals along the cable route.

The NTS (Section 5.2.3) also identifies the **accidental spread of invasive alien plant species during landscaping as a permanent significant negative impact**. No baseline invasive

species survey of the full cable route corridor has been provided, and no detailed invasive species management plan setting out prevention, monitoring and response protocols has been submitted. The proposed two-year post-planting monitoring programme does not adequately address this risk.

7.8 Cumulative Biodiversity and Ecological Effects

The Concern Group respectfully submits that the EIAR does not provide an adequate assessment of cumulative and indirect ecological effects. This is contrary to the requirements of the EIA Directive and the standards confirmed in *Sweetman* and *Holohan*. The following interactions are not adequately assessed:

- The interaction between **habitat loss, artificial lighting and construction noise** on bat commuting behaviour and foraging activity — assessed in isolation rather than as overlapping impacts on the same species;
- The combined effects of **construction disturbance and operational noise** on breeding bird success, including the seven Amber-listed species confirmed within the site;
- The **cumulative fragmentation of the ecological network** through hedgerow removal, cable route trenching, and root severance across 12 confirmed instances along the road corridor;
- The interaction between **hydrological disruption and ecological effects** on groundwater-dependent habitats, smooth newt and amphibian populations;
- The **long-term ecological gap** during which replacement planting will fail to provide equivalent habitat function — a period measured in decades rather than the two years reflected in the monitoring commitment;
- The cumulative ecological effects of the **proposed Gannow Windfarm** (Planning Ref. 25/61412) acknowledged within the EIAR as a cumulative project — on shared ecological corridors, bat populations and breeding bird assemblages in the wider landscape; and
- The cumulative visual and noise disturbance on breeding birds from the combination of the **30 m exhaust stack, storage tanks and 36 m telecommunications mast** within a rural agricultural landscape.

Appendix F further demonstrates the extent of protected and notable species records occurring within the wider receiving environment surrounding the proposed development and reinforces concerns regarding cumulative ecological disturbance and habitat fragmentation.

The Concern Group respectfully submits that cumulative biodiversity and ecological effects cannot be disaggregated from the wider Cashla Peaker Project and associated infrastructure. The ecological implications of the underground cable corridor must be assessed alongside the

impacts of the generating station, substation, gas infrastructure and associated works as a single integrated project.

7.9 Conclusion

The Concern Group respectfully submits that the proposed development gives rise to significant biodiversity and ecological concerns which have not been adequately assessed within the application documentation.

The proposed underground cable corridor, substation infrastructure, telecommunications infrastructure and associated construction works would result in prolonged ecological disturbance within an environmentally sensitive rural receiving environment characterised by ecological connectivity, groundwater sensitivity, hedgerow networks and confirmed activity of six protected bat species and multiple Red and Amber-listed bird species.

The Concern Group respectfully submits that the following specific deficiencies require to be addressed before this application can properly be determined:

- **Bat surveys along the full 8.1 km cable route corridor** (L7108, L7109 and L3103) in accordance with BCT (2023) best practice guidelines, covering the full May to September activity season;
- **Roost emergence and re-entry surveys** on all trees with confirmed bat roost potential prior to any felling or vegetation clearance;
- **Topographic survey of all trees and hedgerows** within 15 metres of the proposed cable trench line along the public road sections, with accurate Root Protection Area mapping;
- **Pre-construction root investigation** using air vacuum or Airspade methodology along the full cable route road sections to identify significant root systems before trenching commences;
- **Assessment of hedgerows as ecological connectivity features** under the Galway County Development Plan 2022–2028, national biodiversity policy and the European Communities (Birds and Natural Habitats) Regulations 2011;
- **A dedicated ornithological assessment** of the cable route road corridors for breeding and foraging birds;
- **Demonstration of landowner consent** from private landowners whose trees and hedgerows will be directly or indirectly impacted by the cable route works; and
- **A comprehensive cumulative ecological assessment** integrating the impacts of habitat loss, lighting, noise and groundwater interaction on all confirmed protected and conservation-concern species.

The Concern Group further submits that the EIAR conclusions rely heavily upon mitigation measures, ecological supervision, timing restrictions and post-construction reinstatement to reduce acknowledged significant ecological effects to acceptable levels. In circumstances where the receiving environment is characterised by ecological connectivity, karst hydrogeology, confirmed protected species activity and cumulative infrastructure pressure, significant uncertainty remains regarding the long-term effectiveness of these measures.

Accordingly, the Concern Group respectfully submits that the EIAR materially underestimates the biodiversity and ecological impacts associated with the proposed development and does not meet the standard of a complete, precise and definitive ecological assessment required under the EIA Directive and established in *Sweetman v An Bord Pleanála* [2014] and *Holohan v An Bord Pleanála* [2018].

8 Hydrology, Groundwater, Karst Geology and Water Environment

8.1 Introduction

This chapter addresses the hydrology, hydrogeology, drainage and groundwater implications of the proposed 220kV underground grid connection infrastructure, associated substation development and related construction works.

The Concern Group respectfully submits that the EIAR materially underestimates the potential hydrological and hydrogeological impacts arising from the proposed development, particularly having regard to the karst limestone characteristics of the receiving environment, the identified groundwater vulnerability of the area and the scale of the proposed excavation and infrastructure works.

The proposed underground cable corridor and associated infrastructure traverse a receiving environment characterised by karst limestone geology, shallow bedrock conditions, groundwater vulnerability, agricultural drainage systems, surface water and groundwater interaction and established rural-residential occupation.

The applicant's own geophysical survey has identified multiple anomalies with very high resistivity levels, indicating potential air voids or clay-filled voids at several resistivity points ranging from A1 to A18, suggesting the presence of karst formations or other subsurface pockets beneath the proposed site.

The application documentation confirms that the proposed development would involve prolonged trench excavation, three horizontal directional drilling (HDD) operations beneath the M6 and M17 motorways, substantial construction activity, installation of permanent

underground infrastructure and interaction with existing drainage and groundwater pathways throughout the receiving environment.

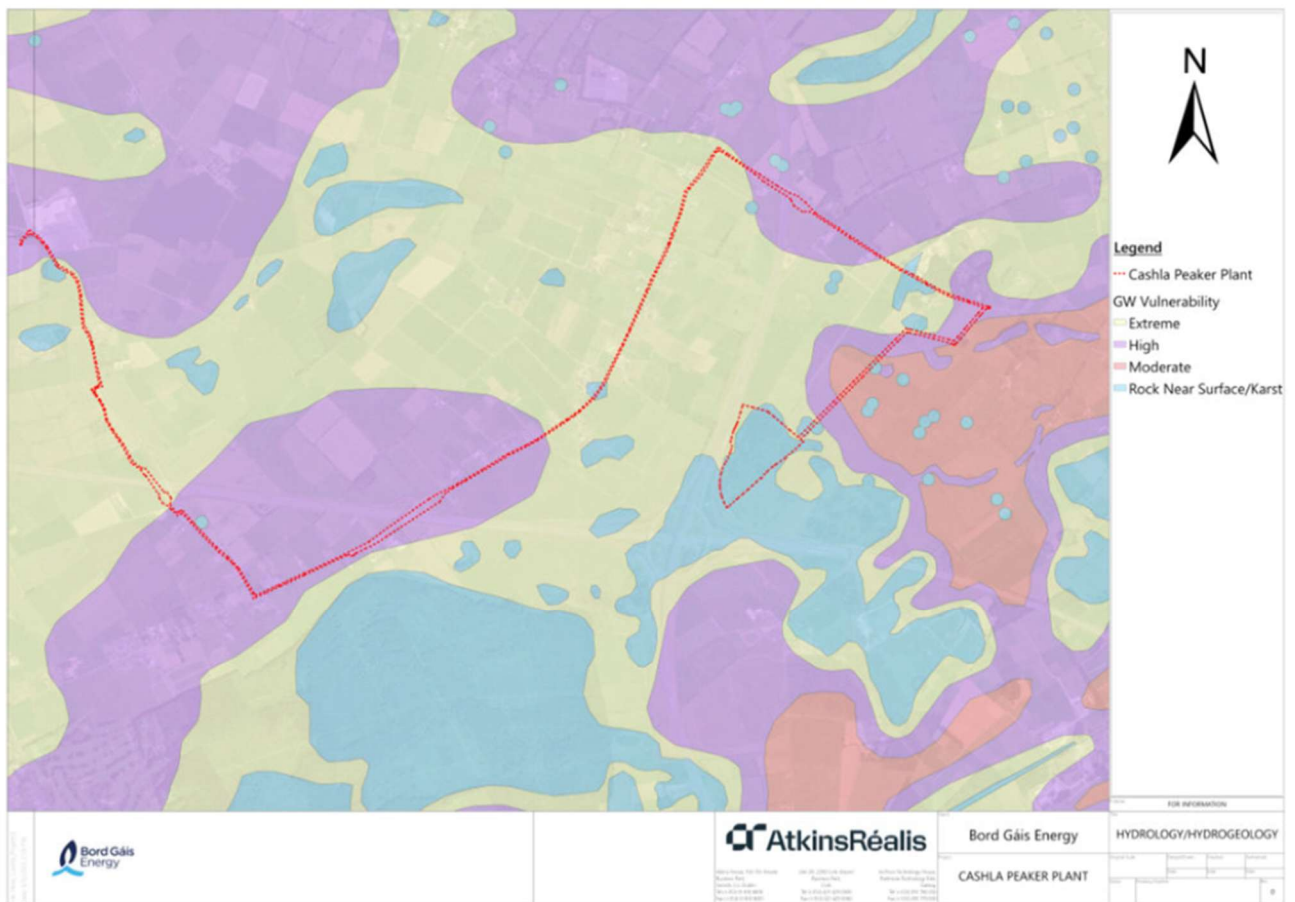
Particular concern arises regarding groundwater contamination risk, sediment mobilisation, drilling fluid migration, alteration of drainage pathways, cumulative interaction between construction activity and vulnerable groundwater systems and uncertainty associated with karst hydrological behaviour.

The Concern Group further notes that the groundwater vulnerability beneath the site is classified as a combination of ‘Extreme’ and ‘Rock at or near surface or karst’ by Geological Survey Ireland (GSI, 2025), and the bedrock aquifer is designated as Regionally Important Aquifer — Karstified (conduit).

The hydrological implications of the proposed underground cable infrastructure are materially increased when considered cumulatively with ACP Ref. 324113 and the wider Cashla Peaker Project.

Geological, excavation stability, soil disturbance and land integrity matters associated with trenching works, HDD operations, shallow bedrock conditions and permanent underground infrastructure are addressed separately in Chapter 9 (Soils, Geology, Excavation and Land Stability). Relevant hydrogeological, groundwater vulnerability and karst assessment material is included within Appendix B.

Accordingly, the Concern Group respectfully submits that the hydrological and hydrogeological impacts associated with the proposed development have not been adequately assessed within the EIAR.



(Source, EIAR Volume 2, Figure 12-2) illustrates the spatial distribution of groundwater vulnerability classifications across the proposed development site and cable route corridor. The map confirms that the proposed underground cable infrastructure would traverse areas classified as Extreme vulnerability, High vulnerability, and Rock at or near Surface/Karst, with the cable route passing through multiple such zones along its 8.1km length.

8.2 Karst Geology and Groundwater Vulnerability

The EIAR and supporting hydrogeological documentation confirm that the receiving environment is characterised by karst limestone geology of the Burren Formation, fractured and fissured bedrock, shallow groundwater pathways and varying levels of groundwater vulnerability.

The Concern Group respectfully submits that karst limestone environments are particularly sensitive to contamination and hydrological disturbance. Guidance from Geological Survey Ireland notes that groundwater in karst settings is “*particularly vulnerable due to rapid flow and limited attenuation of contaminants.*” This vulnerability arises from:

- rapid groundwater movement through subsurface conduits;
- direct hydraulic connectivity between surface activities and groundwater systems;
- limited filtration and attenuation capability; with contaminants able to “*travel rapidly with little or no natural filtration*” (Environmental Protection Agency);
- and the presence of fissures, conduits and subsurface drainage pathways including swallow holes; and
- unpredictable subsurface flow behaviour that makes contaminant movement difficult to predict or control.

Unlike non-karst environments, groundwater flow in karst systems is often rapid and unpredictable, with limited attenuation of contaminants. Once contaminated, karst groundwater is difficult or impossible to remediate.

The Concern Group respectfully submits that the absence of persistent surface water or visibly wet ground conditions in sections of the receiving environment does not negate the underlying hydrogeological sensitivity of the area. The documented karst characteristics, groundwater vulnerability and subsurface connectivity identified within the EIAR indicate that potentially significant groundwater interaction may occur notwithstanding relatively dry surface conditions in parts of the route corridor.

Particular concern arises regarding the extent to which prolonged excavation works, three HDD operations beneath major motorways, trenching activity and infrastructure installation may interact with vulnerable groundwater pathways throughout the receiving environment.

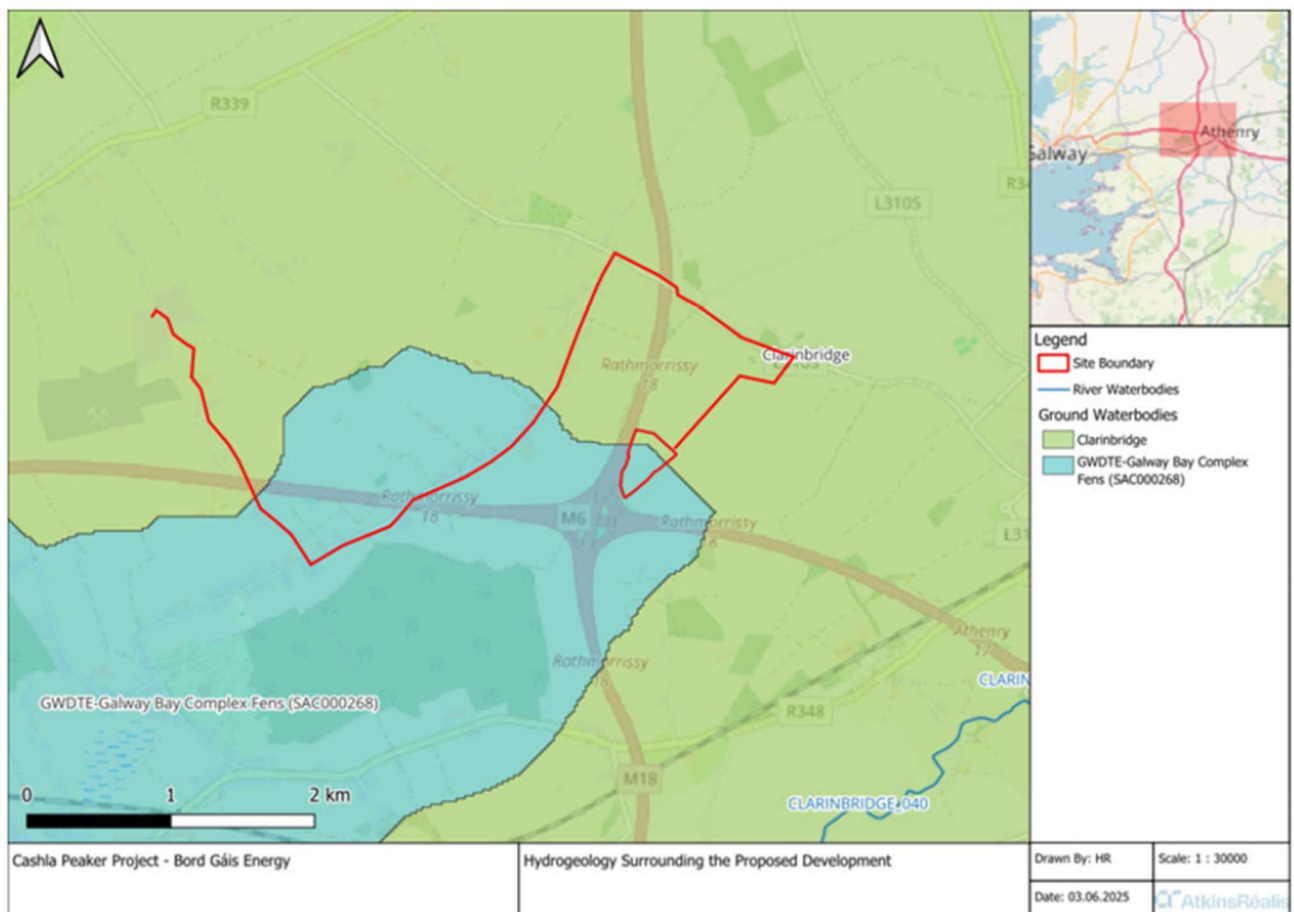
The applicant’s own documentation acknowledges that “*fissured or fractured rock*” conditions are “*unsuitable for HDD because they increase the chances of bentonite being lost and eventually breaking up through the overburden soils*” (Construction Grid Connection Report, Vol. 3, Appendix 2.7).

The geological characteristics of the receiving environment are relevant in this chapter insofar as they affect groundwater vulnerability, subsurface flow pathways and potential contamination movement. Wider issues relating to excavation stability, soil disturbance and land integrity are addressed separately in Chapter 9 (Soils, Geology, Excavation and Land Stability). Supporting hydrogeological, groundwater vulnerability and karst assessment material is included within Appendix B.

The Concern Group respectfully submits that insufficient certainty has been provided regarding:

- groundwater flow behaviour within the receiving environment particularly within identified karst anomalies;
- subsurface connectivity between surface water and groundwater systems through swallow holes, fissures and conduits;

- potential contaminant migration pathways in an aquifer system characterised by rapid, unpredictable flow;
- potential interaction with private groundwater wells and rural domestic water supplies serving residential properties and agricultural holdings throughout the receiving environment; the NTS confirms six private water abstractions for agricultural and domestic purposes exist in the area, yet the EIAR does not assess their proximity to potential contamination pathways;
- and the cumulative implications of prolonged infrastructure works within a karst hydrogeological setting particularly where the Galway Bay Groundwater Dependent Terrestrial Ecosystem (GWDTE) underlies part of the development and is connected to the Galway Bay Complex Special Area of Conservation (SAC).



(Source EIAR Volume 2, Figure 12-3) This demonstrates that the proposed development site and cable route corridor directly overlies and traverse the GWDTE-Galway Bay Complex Fens (SAC000268), a legally protected Groundwater-Dependent Terrestrial Ecosystem connected to the Galway Bay Complex Special Area of Conservation. This spatial overlay confirms direct hydraulic connectivity between proposed construction activities, groundwater pathways and a designated European site. In a karst aquifer system characterised by rapid subsurface flow and limited natural attenuation, contamination reaching the groundwater system could directly impact this protected ecosystem, potentially constituting a breach of the Habitats Directive.

8.3 HDD Operations and Drilling Fluid Migration Risk

Particular concern arises regarding the interaction between HDD operations, drilling fluids (bentonite), excavation activity, groundwater pathways and vulnerable receptors within the receiving environment.

The application documentation acknowledges the potential for drilling instability and inadvertent drilling fluid loss (commonly referred to as “frac-out” events) associated with fractured geological conditions.

The applicant’s Construction Grid Connection Report (Vol. 3, Appendix 2.7) explicitly states that “*fissured or fractured rock*” conditions “*increase the chances of bentonite being lost and eventually breaking up through the overburden soils.*”

The EIAR also acknowledges that fractured and fissured rock conditions are present along sections of the route corridor, increasing uncertainty regarding containment, migration pathways and groundwater interaction during HDD operations. The applicant proposes mitigation measures including constant monitoring of drilling pressure, immediate cessation of drilling if breakout signs appear, and use of higher viscosity bentonite if needed. However, in circumstances involving acknowledged hydrogeological uncertainty and groundwater vulnerability within a karst limestone environment, the Concern Group respectfully submits that the application of the precautionary principle is warranted.

In a karst aquifer characterised by rapid groundwater movement through fissures and conduits, a frac-out event could result in drilling fluid migrating quickly and unpredictably through subsurface pathways, potentially reaching private water supplies, agricultural wells, or ecologically sensitive groundwater-dependent ecosystems before effective containment or remediation is possible.

The Concern Group respectfully submits that insufficient information has been provided regarding:

- site-specific geological assessment of frac-out risk at each of the three proposed HDD locations beneath the M6 and M17 motorways;
- containment of drilling fluids within karst geological conditions;
- contingency arrangements in the event of drilling fluid migration into subsurface fissures or conduits;
- identification and remediation procedures for inadvertent returns through karst features;
- groundwater monitoring procedures during and following HDD operations; and
- long-term groundwater protection measures associated with the proposed development, including monitoring of nearby private water supplies.

Appendix B further illustrates the sensitivity of the receiving karst limestone environment and the potential for direct groundwater interaction associated with excavation and HDD operations.

Accordingly, the Concern Group respectfully submits that the EIAR materially underestimates the hydrogeological sensitivity of the receiving environment and the associated drilling fluid migration risks arising from the proposed HDD operations.

8.4 Cable Thermal Performance and Long-Term Ground Interaction

The Concern Group further submits that insufficient information has been provided regarding the thermal and geological interaction between the proposed underground cable infrastructure and the receiving ground conditions.

The Concern Group respectfully submits that full route-wide soil thermal-resistivity testing and cable heat modelling should be completed prior to any grant of permission. In the absence of comprehensive route-wide thermal and hydrogeological assessment, uncertainty remains regarding long-term cable performance, drying effects within surrounding soils, groundwater interaction and the potential requirement for future excavation and maintenance intervention.

In karst limestone and variable limestone till conditions, uncertainty regarding heat dissipation characteristics and subsurface thermal behaviour may increase the likelihood of future maintenance intervention, cable faults, repeated excavation activity and renewed disturbance within the affected road network and groundwater-sensitive environment.

This is particularly significant where the proposed cable route would be installed within constrained rural roads already subject to cumulative underground infrastructure pressure, repeated excavation activity and long-term reinstatement concerns.

8.5 Surface Water, Drainage and Construction Interaction

The proposed underground cable corridor would require prolonged trench excavation and infrastructure installation works throughout an established rural environment characterised by agricultural drainage systems, roadside drainage infrastructure and surface water connectivity.

The Concern Group respectfully submits that the proposed works may result in sediment mobilization, disruption of existing drainage systems, alteration of local hydrological pathways and cumulative impacts affecting surface water quality and drainage performance.

Particular concern arises regarding trench excavation within roadside drainage corridors, prolonged exposure of excavated material, interaction with agricultural drains and cumulative disturbance affecting local drainage systems over an extended construction programme.

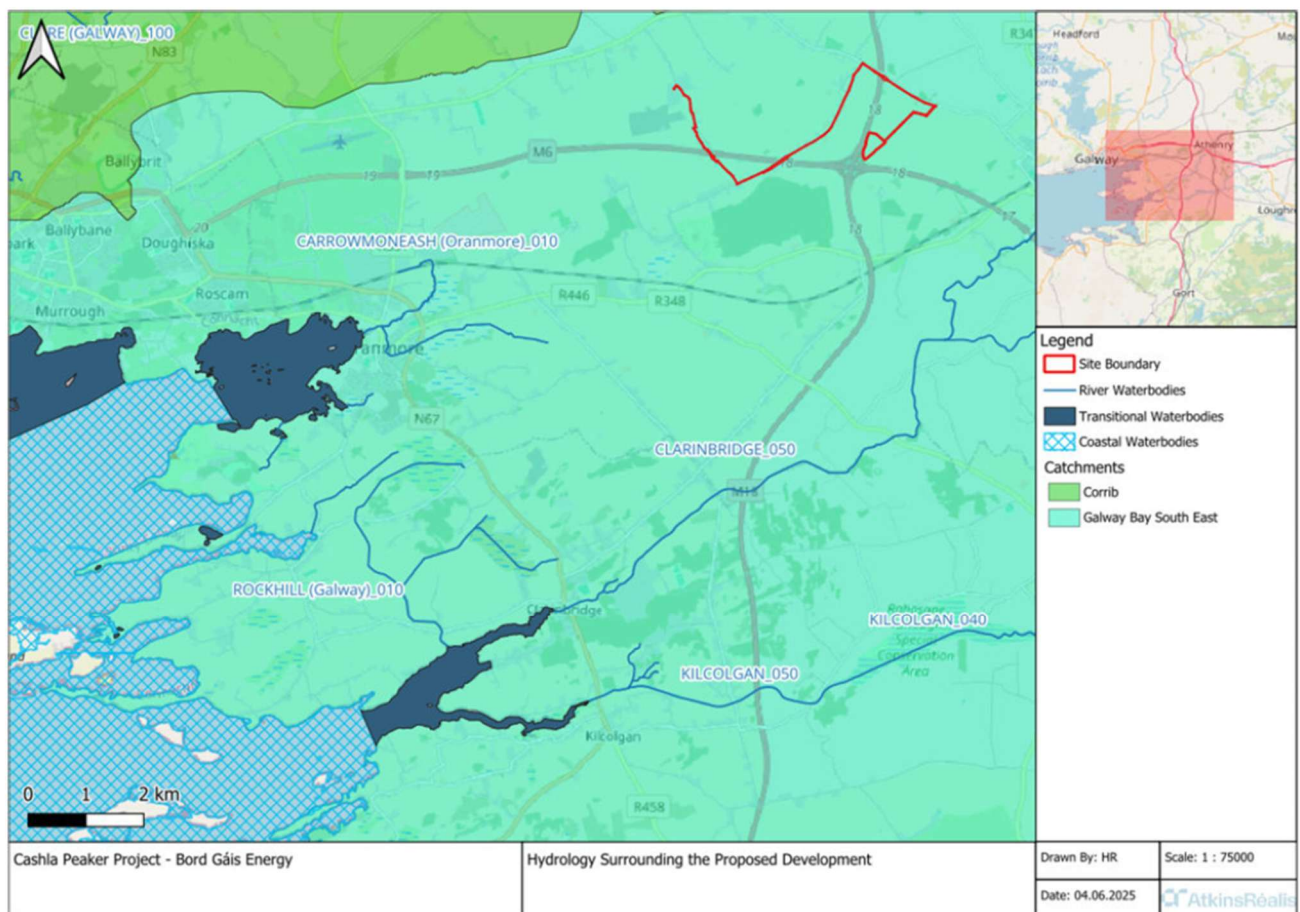
The application documentation confirms that the proposed development would involve repeated excavation and reinstatement operations throughout sections of the local road network and adjoining lands.

The Concern Group respectfully submits that insufficient assessment has been undertaken regarding:

- cumulative drainage disruption;
- management of sediment-laden runoff;
- reinstatement of agricultural drainage systems;
- and the long-term hydrological implications of repeated trench excavation within the receiving environment.

Additional concern arises regarding the interaction between construction traffic, excavation works, drainage infrastructure and surface water management arrangements during periods of prolonged construction activity.

In karst systems, surface water features may be directly connected to groundwater through swallow holes or fissures. The NTS confirms no surface water bodies within 2km of the site, which means groundwater is the sole hydrological receptor. This increases rather than decreases the significance of groundwater protection, as there is no surface water dilution pathway to mitigate the consequences of a contamination event entering the groundwater system through disrupted drainage pathways.



(Source EIAR Volume 2, Figure 12-1) This confirms the absence of surface water bodies within the immediate vicinity of the proposed development, with the nearest transitional waterbodies (Rockhill and Kilcolgan) located to the southwest and south respectively. This confirms that groundwater represents the sole hydrological receptor within the development area, with no surface water dilution pathway available to mitigate contamination events. The site falls within the Galway Bay South East catchment, with subsurface hydrological connectivity directing flow toward coastal transitional waterbodies.

Particular concern also arises regarding the extent to which repeated trench excavation and reinstatement within constrained rural roads may alter existing drainage performance, increase localised flooding risk and contribute to long-term deterioration of roadside drainage integrity.

Accordingly, the Concern Group respectfully submits that the EIAR does not adequately assess the likely surface water and drainage implications associated with the proposed development.

8.6 Construction Risks, Sediment Control and Water Protection

The proposed development would involve substantial construction activity occurring within a hydrologically sensitive receiving environment.

The Concern Group respectfully submits that the proposed works have the potential to give rise to, sediment runoff, accidental contamination, drilling fluid migration, fuel and hydrocarbon spill risks and cumulative water quality impacts affecting surface water and groundwater receptors.

Particular concern arises regarding:

- prolonged excavation activity during wet weather conditions;
- storage and handling of fuels and hazardous materials;
- HDD operations within fractured karst geology;
- and cumulative interaction between construction activity and groundwater-sensitive areas, including overlapping excavation impacts, combined groundwater disturbance and interconnected contamination pathways.

This chapter addresses construction risks insofar as they relate to water quality, drainage and groundwater protection. The physical excavation, soil handling and land stability implications of the proposed works are addressed separately in Chapter 9 (Soils, Geology, Excavation and Land Stability).

The applicant's own documentation acknowledges the risk of drilling instability and drilling fluid loss associated with fractured geological conditions. Supporting hydrogeological and karst vulnerability information is included within Appendix B.

The EIAR proposes mitigation measures including bunding of bentonite handling areas, immediate cleanup of spills, silt fencing 5m from HDD pits, and preparation of a Fracture Blow-out (Frac-out) Prevention and Contingency Plan. However, the effectiveness of these measures in karst conditions where subsurface pathways are rapid and unpredictable remains uncertain.

The Concern Group respectfully submits that insufficient certainty has been provided regarding containment of drilling fluids within karst geological conditions, emergency response procedures, management of accidental releases, identification and remediation of inadvertent returns through subsurface features, protection of nearby water receptors and independent environmental monitoring during construction activity.

Particular concern also arises regarding the cumulative interaction between:

- prolonged construction activity;
- drainage disturbance;
- groundwater vulnerability;
- and contamination pathways within the receiving environment.

The Concern Group respectfully submits that insufficient information has been provided regarding water quality monitoring protocols, sediment control measures, contingency arrangements during heavy rainfall events and long-term water protection arrangements associated with the proposed infrastructure.

Accordingly, the Concern Group respectfully submits that the likely hydrological and water quality risks associated with the proposed development have not been adequately assessed within the EIAR.

8.7 Cumulative Hydrological and Groundwater Effects

The Concern Group respectfully submits that the proposed underground cable corridor cannot be assessed in isolation from:

- the proposed generating station;
- associated gas infrastructure;
- drainage and road infrastructure works;
- other utility infrastructure;
- and cumulative construction activity affecting the receiving environment.

Particular concern arises regarding the cumulative interaction between prolonged excavation works, HDD operations beneath major motorways, drainage disturbance, groundwater vulnerability and long-term infrastructure occupation within a karst limestone environment.

At the main generating station site, the applicant proposes direct discharge of stormwater to the karstified aquifer via an infiltration pond with only a single hydrocarbon separator as treatment, and discharge from the Gas AGI via a local soak pit with only a bypass separator (CE Report, Appendix 2.1). During the construction phase, a temporary infiltration lagoon lined only with permeable geotextile, filter aggregates and sand will discharge construction runoff directly to groundwater. These multiple direct discharge points to an aquifer rated Extreme to High vulnerability represent cumulative groundwater contamination risk extending beyond the cable route corridor alone.

The Concern Group further submits that insufficient consideration has been given to:

- cumulative contamination risk;
- cumulative drainage impacts;
- interaction between multiple infrastructure systems;

- and the long-term hydrological implications of repeated infrastructure intervention within the receiving environment.

Particular concern also arises regarding cumulative interaction with other infrastructure proposals affecting sections of the same receiving environment, including the proposed Gannow Wind Farm grid connection project (Galway County Council Ref. 2561412; ABP Ref. PL07.500493).

The wider integrated Cashla Peaker Project gives rise to cumulative hydrological and groundwater interaction effects extending beyond those assessed within the standalone application documentation. The hydrogeological material contained within Appendix B further illustrates the interconnected and vulnerable nature of groundwater pathways throughout the receiving environment.

The application documentation also confirms ongoing interaction between the proposed development and existing underground utility infrastructure, including gas, drainage, electrical and telecommunications systems. The proposed cable route intersects with an existing high-pressure gas main, and works in the vicinity introduce risk of accidental strike, gas leakage and potential groundwater contamination from incident response activities.

The Concern Group respectfully submits that insufficient assessment has been undertaken regarding cumulative groundwater risk, cumulative drainage and runoff effects, long-term interaction between multiple infrastructure systems and the operational and environmental implications of repeated infrastructure intervention within a groundwater-sensitive karst environment.

The Concern Group respectfully submits that these unresolved coordination, protection and infrastructure interaction issues further demonstrate that the long-term hydrogeological implications of concentrated infrastructure development within this vulnerable karst environment remain insufficiently resolved and cannot presently be assessed with adequate scientific certainty.

Accordingly, the Concern Group respectfully submits that the cumulative hydrological and groundwater implications of the wider integrated Cashla Peaker Project have not been adequately assessed within the EIAR.

8.8 Conclusion

The Concern Group respectfully submits that the proposed development gives rise to significant hydrological and hydrogeological concerns which have not been adequately assessed within the application documentation.

The proposed underground cable corridor and associated infrastructure works would involve prolonged excavation activity, three HDD operations beneath major motorways in karst geological conditions, trenching works, substantial construction activity and permanent infrastructure installation within a groundwater-sensitive karst limestone environment officially classified as Extreme to High vulnerability and underlain by a Regionally Important Aquifer — Karstified (conduit).

The Concern Group respectfully submits that insufficient consideration has been given to:

- groundwater vulnerability within a karst hydrogeological system characterised by rapid and unpredictable subsurface flow;
- identified anomalies indicating potential air voids, fissures or preferential groundwater pathways;
- drainage disruption affecting both agricultural and roadside drainage systems;
- drilling fluid migration risks in fractured geological conditions acknowledged by the applicant as increasing the likelihood of drilling fluid loss during HDD operations;
- sediment and contamination pathways within a groundwater system with limited natural attenuation capacity;
- cumulative hydrological disturbance arising from prolonged excavation activity and multiple direct discharge points to groundwater;
- and long-term groundwater protection measures, including monitoring of nearby private water supplies.

Particular concern arises regarding the extent to which prolonged construction activity and permanent infrastructure occupation may interact with vulnerable groundwater systems characterised by fractured limestone geology and rapid subsurface flow pathways, and the potential impact on six confirmed private water abstractions for agricultural and domestic purposes whose specific locations and proximity to contamination pathways have not been assessed.

The Concern Group further submits that these hydrological and groundwater concerns are closely linked to, but distinct from, the geological, soil and land stability concerns addressed in Chapter 9 (Soils, Geology, Excavation and Land Stability).

The Concern Group further submits that the hydrological sensitivity of the receiving environment is materially increased by the cumulative interaction between karst groundwater conditions officially classified at Extreme to High vulnerability, prolonged linear excavation works, three HDD operations in fractured rock acknowledged as unsuitable for such drilling, permanent underground infrastructure and ongoing infrastructure intensification throughout the wider Cashla Peaker Project area including multiple direct discharge points to the karstified aquifer

Accordingly, the Concern Group respectfully submits that the EIAR materially underestimates the likely hydrological and groundwater risks associated with the proposed development and

does not provide a sufficiently robust, precautionary or cumulative assessment of prolonged infrastructure development within this groundwater-sensitive karst receiving environment.

9 Soils, Geology, Excavation and Land Stability

9.1 Introduction

This chapter addresses the planning, environmental and land stability concerns arising from the proposed underground cable corridor and associated infrastructure, having regard to the geological, excavation and reinstatement characteristics of the receiving environment.

The Concern Group respectfully submits that the proposed development gives rise to significant concerns relating to:

- extensive trench excavation works;
- shallow bedrock conditions;
- karst limestone geology;
- HDD operations;
- rock-breaking activity;
- soil disturbance and reinstatement;
- road verge and embankment stability;
- agricultural land impacts;
- and long-term land stability risks associated with permanent underground infrastructure.

The receiving environment is characterised by shallow and variable soil cover, limestone bedrock, fractured and fissured karst geology, agricultural land use, local drainage networks and constrained rural roads with limited verge width and varying ground conditions.

The applicant's own documentation confirms that sections of the route corridor contain shallow rock and karst limestone conditions which may require substantial excavation and rock-breaking activity during construction. These geological conditions increase sensitivity to excavation instability, drilling uncertainty, settlement and subsidence risk, soil disturbance, drainage disruption and long-term infrastructure maintenance risks.

Hydrological and groundwater matters associated with karst groundwater vulnerability, drilling fluid migration and water quality protection are addressed separately in Chapter 8 (Hydrology, Groundwater, Karst Geology and Water Environment).

Accordingly, the Concern Group respectfully submits that the likely impacts on soils, geology and land stability associated with the proposed development have not been adequately assessed within the EIAR.

9.2 Karst Limestone and Geological Constraints

The proposed underground cable corridor traverses a receiving environment characterised by limestone bedrock and karst geological conditions.

The application documentation confirms the presence of fractured and fissured limestone, shallow bedrock, variable overburden depth and karst-related subsurface conditions.

The Concern Group respectfully submits that karst environments are inherently sensitive to excavation and infrastructure development due to:

- unpredictable subsurface conditions;
- variable rock stability;
- dissolution features and voiding potential;
- irregular rock profiles;
- and irregular subsurface conditions associated with fractured limestone environments.

The EIAR acknowledges uncertainty associated with subsurface geological conditions and HDD operations within karst limestone, confirming that fractured and fissured rock conditions may increase drilling instability and construction complexity. Notwithstanding these acknowledged constraints, the EIAR does not adequately demonstrate that the proposed excavation methodology, HDD strategy and reinstatement approach can be implemented without significant residual uncertainty regarding subsurface stability and cumulative land disturbance effects.

The Concern Group respectfully submits that insufficient information has been provided regarding detailed route-specific geological investigations, subsurface void detection, karst feature mapping, rock stability assessment, and contingency measures in the event of unstable ground conditions, collapse or excessive ground movement.

Particular concern arises regarding cumulative excavation instability, overlapping trenching disturbance, combined rock-breaking impacts, excavation interaction with wider infrastructure works, and cumulative subsurface disturbance associated with the integrated Cashla Peaker Project. The combined construction activity associated with ACP Ref. 324113 and ACP Ref. 324162 materially increases cumulative excavation, land stability and subsurface disturbance risks within the receiving karst limestone environment.

The EIAR alternatives assessment repeatedly characterises the environmental performance of the route options as broadly comparable, with “few constraints identified to differentiate between the options”. The Concern Group respectfully submits that this conclusion is difficult to reconcile with the acknowledged presence of karst geology, constrained rural roads, shallow bedrock conditions, extensive residential occupation and prolonged construction activity throughout the receiving environment.

Accordingly, the Concern Group respectfully submits that the geological, excavation and land stability risks associated with trenching, HDD operations, rock-breaking activity and permanent underground infrastructure installation have been materially underestimated within the EIAR.

9.3 Excavation, Rock-Breaking and Ground Disturbance

The proposed development would require extensive excavation works across approximately 8.1km of rural road network and adjoining lands.

The application documentation confirms that construction works may involve:

- trench excavation;
- HDD drilling operations;
- substantial removal of excavated material;
- road-opening works;
- and rock-breaking activity associated with shallow bedrock conditions.

The Construction Methodology documentation further confirms the likely use of tracked excavators, 22-tonne rock-breaking equipment, heavy construction machinery and segmented excavation operations adjacent to residential and agricultural access points. Excavation works may proceed in phased and segmented sections along constrained rural roads over an extended construction duration involving repeated temporary traffic management, excavation sequencing and reinstatement operations within constrained rural roads.

These works have the potential to result in:

- significant soil disturbance;
- instability of road verges and embankments;
- vibration-related settlement;
- drainage disruption;
- compaction of adjoining agricultural land;
- and long-term reinstatement issues.

The Concern Group respectfully submits that insufficient consideration has been given to excavation adjacent to narrow rural roads, repeated trench reinstatement, trench settlement over time, and the cumulative effect of prolonged excavation activity across the receiving environment. Particular concern arises regarding the potential for vibration and repeated heavy excavation activity to affect adjoining road structures, residential entrances, agricultural accesses and roadside boundary features over time.

Insufficient information has been provided regarding long-term reinstatement standards, settlement monitoring, defect liability arrangements and the extent to which reinstated carriageways and verges would maintain structural integrity over the operational lifespan of the proposed infrastructure.

The Concern Group respectfully submits that insufficient consideration has been given to the long-term implications of repeated trench excavation and reinstatement within constrained rural roads, including future settlement risk, pavement deformation, reinstatement durability and cumulative deterioration associated with permanent underground infrastructure occupation.

9.4 Agricultural Land and Drainage Impacts

The receiving environment comprises an established agricultural landscape characterised by active livestock farming, agricultural drainage infrastructure, managed pastureland and ongoing seasonal agricultural activity.

The Concern Group respectfully submits that trench excavation and associated construction activity have the potential to adversely affect soil structure, agricultural drainage, land productivity, field access arrangements and long-term agricultural land management.

Particular concern arises regarding:

- severance of existing land drains;
- soil compaction from heavy machinery;
- alteration of local drainage pathways;
- localised waterlogging and altered drainage performance;
- and disturbance to productive agricultural soils.

The applicant's own documentation confirms that construction works would interact with existing drainage systems throughout the route corridor.

The Concern Group respectfully submits that insufficient information has been provided regarding:

- drainage reinstatement methodology;
- long-term monitoring of reinstated land drains;
- management of excavated soils;
- segregation of topsoil and subsoil materials;
- and the long-term agricultural implications associated with repeated infrastructure intervention.

The affected agricultural lands and surrounding receiving environment also include established farm drainage systems, existing ponds, and wet ground conditions associated with existing farming activity, which may be vulnerable to disturbance or hydrological alteration arising from trenching, excavation, dewatering, and underground cable installation works.

Particular concern arises regarding the extent to which repeated infrastructure intervention within actively farmed lands may contribute to long-term soil compaction, drainage inefficiency, and reduced agricultural flexibility within the receiving environment. Concern also arises regarding temporary and recurring disruption to agricultural operations arising from segmented trench excavation, restricted field access, machinery movement constraints, and interaction with livestock management and seasonal agricultural activity.

Accordingly, the Concern Group respectfully submits that the likely effects on agricultural soils and drainage infrastructure have not been adequately assessed within the EIAR.

9.5 Road Stability and Long-Term Infrastructure Risks

The proposed underground cable corridor would involve permanent installation of strategic electrical infrastructure within constrained rural roads and road verges.

The Concern Group respectfully submits that insufficient consideration has been given to long-term road stability, trench settlement, differential settlement between reinstated trench sections and existing carriageway structure, road surface degradation, future maintenance requirements, the long-term integrity and serviceability of reinstated carriageway structure, and cumulative infrastructure interaction.

The affected roads comprise constrained rural routes which already accommodate agricultural, residential and commercial traffic activity and were not originally designed to accommodate repeated strategic utility excavation, permanent joint bay infrastructure or long-term underground transmission infrastructure occupation.

Particular concern arises regarding the long-term implications of:

- repeated settlement over buried infrastructure;
- water ingress into reinstated trenches;

- differential ground movement;
- and future excavation associated with infrastructure maintenance and utility coordination.

The applicant's own documentation confirms that aspects of the final cable alignment and utility coordination remain subject to detailed design development. The Concern Group respectfully submits that unresolved alignment and utility coordination matters introduce further uncertainty regarding long-term infrastructure resilience, future road maintenance requirements and the cumulative interaction between underground infrastructure systems within constrained rural roads.

The operational lifespan, maintenance cycles and intervention requirements associated with multiple co-located utility systems may differ significantly, thereby increasing the likelihood of future reopening and repeated disturbance of reinstated carriageways over the operational lifetime of the proposed development.

Particular concern also arises regarding the long-term interaction between the proposed underground electrical infrastructure and existing or future Uisce Éireann infrastructure within constrained rural roads, including future maintenance access, utility coordination requirements and cumulative excavation impacts associated with repeated infrastructure intervention over the operational lifespan of the proposed development.

Accordingly, the Concern Group respectfully submits that the long-term land stability implications associated with the proposed underground infrastructure have not been adequately assessed.

9.6 Cumulative Geological and Land Stability Effects

The proposed development cannot be assessed in isolation from associated substation infrastructure, the wider Cashla Peaker Project, existing underground utilities, drainage infrastructure and cumulative infrastructure intensification throughout the receiving environment.

The cumulative interaction of prolonged excavation activity, rock-breaking operations, trench reinstatement, HDD operations, drainage alteration and permanent underground infrastructure occupation has the potential to result in cumulative effects on soils, geology and land stability extending beyond those assessed within the standalone application documentation.

Particular concern arises regarding:

- cumulative degradation of rural road infrastructure;
- repeated future excavation activity;

- increasing underground utility congestion;
- subsequent reopening of reinstated carriageways;
- long-term trench settlement;
- and cumulative instability associated with infrastructure intensification within a karst limestone environment.

In circumstances where acknowledged geological uncertainty, shallow bedrock conditions and unresolved utility coordination issues remain present at the time of determination, the Concern Group respectfully submits that the application of the precautionary principle is warranted.

Insufficient consideration has been given to the long-term interaction between multiple underground infrastructure systems within constrained rural roads already affected by excavation pressure, reinstatement activity and ongoing infrastructure development.

Particular concern also arises regarding the cumulative interaction between the proposed underground cable corridor and other infrastructure proposals affecting sections of the same road network, including the proposed Gannow Wind Farm grid connection project (Galway County Council Ref. 2561412; ABP Ref. PL07.500493).

Accordingly, the Concern Group respectfully submits that the cumulative geological, excavation and land stability implications associated with the wider integrated Cashla Peaker Project have not been adequately assessed within the EIAR.

9.7 Conclusion

The Concern Group respectfully submits that the proposed development gives rise to significant concerns relating to soils, geology, excavation stability and long-term land integrity.

The proposed underground cable corridor would require extensive excavation, trenching, HDD operations and rock-breaking activity within a receiving environment characterised by karst limestone geology, shallow bedrock, agricultural land use, constrained rural roads and groundwater-sensitive conditions.

The Concern Group respectfully submits that insufficient consideration has been given to karst geological risk, excavation uncertainty, long-term trench settlement, agricultural drainage impacts, road stability, cumulative infrastructure interaction and the long-term implications of permanent underground infrastructure occupation within the receiving environment.

The supporting karst and geological assessment material contained within Appendix B further reinforces the sensitivity of the receiving environment and the uncertainty associated with subsurface conditions, excavation interaction and long-term infrastructure stability.

Accordingly, the Concern Group respectfully submits that the likely impacts on soils, geology and land stability associated with the proposed development have been materially underestimated within the EIAR.

The cumulative interaction between prolonged excavation activity, constrained road geometry, shallow bedrock conditions and unresolved utility coordination introduces a level of residual uncertainty that has not been adequately resolved within the application documentation.

In circumstances where material uncertainty remains regarding subsurface conditions, trench stability, long-term settlement behaviour and cumulative infrastructure interaction within this sensitive karst limestone environment, the Concern Group respectfully submits that the EIAR does not provide a sufficiently reliable basis upon which An Coimisiún Pleanála may complete a lawful and robust environmental assessment of the proposed development.

10 Pollution, Noise and Environmental Risk

10.1 Introduction

This chapter addresses the pollution, noise and environmental risk implications associated with the proposed underground cable corridor, associated 220kV substation infrastructure and related construction activity forming part of the proposed Cashla Peaker Project.

The Concern Group respectfully submits that the proposed development would give rise to significant pollution, noise and environmental risk concerns arising from prolonged construction activity, trenching and excavation works, HDD operations, heavy construction traffic and machinery movement, rock-breaking activity, permanent electrical infrastructure and cumulative interaction with the wider Cashla Peaker Project and associated infrastructure.

The proposed underground cable corridor and associated substation infrastructure are located within an established mixed rural-residential environment characterised by residential occupation, agricultural activity, ecological sensitivity and constrained rural roads with limited separation distances between residential properties and the proposed construction corridor.

The applicant's own documentation confirms that the receiving environment is environmentally sensitive, including groundwater vulnerability and karst hydrogeological characteristics addressed further in Chapter 8 (Hydrology, Groundwater, Karst Geology and Water Environment) and Chapter 9 (Soils, Geology, Excavation and Land Stability).

The Concern Group respectfully submits that these environmental characteristics significantly increase sensitivity to:

- construction noise and vibration;
- dust and air quality impacts;
- sediment mobilisation and contamination risks;
- drilling fluid migration;
- and cumulative environmental disturbance associated with prolonged infrastructure works.

Particular concern arises regarding the extent to which excavation activity, trenching operations, HDD works, machinery movement and prolonged road occupation may occur in close proximity to residential properties, ecological receptors, drainage systems and environmentally sensitive areas throughout the receiving environment.

The Concern Group further submits that the EIAR repeatedly characterises many of the likely impacts as temporary and negligible while insufficiently assessing the cumulative and recurring effect of prolonged construction activity occurring within settled rural communities and environmentally sensitive areas over an extended construction programme.

Hydrological and groundwater matters are addressed separately in Chapter 8 (Hydrology, Groundwater, Karst Geology and Water Environment), while geological, excavation stability and land integrity matters are addressed further in Chapter 9 (Soils, Geology, Excavation and Land Stability). Residential amenity impacts are addressed further in Chapter 13 (Residential Amenity and Community Impacts).

Accordingly, the Concern Group respectfully submits that the EIAR does not adequately assess the likely pollution, noise and environmental risks associated with the proposed development.

10.2 Construction Noise, Vibration and Residential Disturbance

The proposed underground cable corridor would require prolonged construction activity extending across approximately 8.1km of constrained rural roads and adjoining lands throughout the receiving environment.

The application documentation confirms that the proposed works may involve trench excavation and reinstatement activity, HDD operations, heavy construction traffic, substantial excavation plant and potential rock-breaking operations associated with the excavation conditions identified within the route corridor.

The Concern Group respectfully submits that such works have the potential to result in prolonged construction noise, vibration impacts, repeated disturbance affecting residential properties and cumulative disruption within settled rural communities over extended periods.

Particular concern arises regarding the extent to which excavation works, machinery movement and construction activity may occur immediately adjacent to residential properties, agricultural entrances, boundary walls and established roadside development throughout sections of the route corridor.

The Construction Methodology documentation further confirms that trenching works adjacent to residential and property entrances may proceed in segmented sections in order to maintain access arrangements during construction. The Concern Group respectfully submits that this confirms the likelihood of repeated construction disturbance occurring in close proximity to residential receptors over prolonged periods.

Particular concern also arises regarding:

- prolonged rock-breaking operations;
- vibration impacts affecting dwellings, agricultural buildings and boundary structures;
- cumulative disturbance arising from repeated excavation and reinstatement activity;
- and the interaction between construction noise, traffic movement and prolonged road occupation throughout the receiving environment.

The Concern Group further notes the absence of dedicated route-specific baseline noise surveys for residential receptors located along the underground cable corridor.

Insufficient information has also been provided regarding the likely duration, sequencing and daily intensity of construction activity affecting individual residential receptors along the route corridor. In the absence of detailed route-specific construction scheduling information, significant uncertainty remains regarding the cumulative duration of noise, vibration and disturbance exposure affecting nearby residents and agricultural operators.

The Concern Group further notes that the EIAR itself acknowledges that predicted construction noise levels along sections of the underground cable corridor may exceed the adopted construction noise criterion at nearby noise-sensitive locations and expressly states that this would indicate ‘a potential significant effect’. The Concern Group respectfully submits that the subsequent conclusion of temporary or non-significant impact relies heavily upon assumptions regarding short-duration exposure and rolling construction progression along the route corridor.

Unlike the proposed Gannow Wind Farm and associated grid connection project affecting sections of the same receiving environment, the Bord Gáis application does not include equivalent route-specific residential baseline noise monitoring within Rathmorrissy, Moanbaun, Knocknacreeva, Caraunduff and surrounding townlands.

The Concern Group respectfully submits that insufficient information has therefore been provided regarding:

- existing ambient noise conditions along the underground cable corridor;

- the representativeness of selected baseline monitoring locations;
- the extent to which short-term survey periods adequately reflect the rural acoustic environment;
- cumulative noise exposure affecting residents;
- vibration sensitivity of nearby properties;
- impulsive and tonal noise associated with rock-breaking operations, generators and construction plant;
- and the likely cumulative impact of prolonged excavation and rock-breaking activity on residential amenities.

Insufficient detail has also been provided regarding:

- vibration monitoring protocols;
- peak particle velocity thresholds;
- structural monitoring arrangements;
- and contingency measures in the event of vibration-related disturbance or structural effects.

The Concern Group further submits that insufficient information has been provided regarding pre-construction condition surveys, baseline property condition recording and structural protection measures for residential dwellings, agricultural buildings, boundary walls and other structures located in close proximity to trench excavation, HDD works, heavy construction traffic and potential rock-breaking activity along the route corridor. Given the acknowledged potential for vibration, excavation disturbance and prolonged construction activity within constrained rural roads, the Concern Group respectfully submits that pre-construction condition surveys should have been identified and scoped within the assessment and mitigation framework presented in the EIAR.

Particular concern also arises regarding potential operational noise and tonal electrical hum associated with permanent substation infrastructure and electrical equipment within an established rural-residential environment characterised by low existing background noise conditions.

Particular concern also arises regarding the potential for early-morning, evening or extended-duration construction activity associated with traffic management requirements, HDD operations and utility coordination works within close proximity to residential properties.

Residential amenity impacts are addressed separately in Chapter 13 (Residential Amenity and Community Impacts).

Accordingly, the Concern Group respectfully submits that the likely construction noise and vibration impacts associated with the proposed development have not been adequately assessed within the EIAR.

10.3 Dust, Air Quality and Construction Pollution Risks

The proposed development would involve prolonged excavation, trenching, drilling, reinstatement and heavy construction activity extending across multiple townlands and constrained rural road corridors throughout the receiving environment.

The Concern Group respectfully submits that such works have the potential to result in dust generation, airborne particulate emissions, sediment mobilisation, accidental contamination risks and cumulative air quality impacts affecting nearby residents, agricultural lands and ecological receptors.

Particular concern also arises regarding dust deposition, sediment transfer and diesel-related particulate accumulation affecting agricultural lands, silage storage areas, grazing areas and farm access corridors located immediately adjacent to sections of the proposed construction route.

Prolonged excavation and construction activity occurring in close proximity to residential properties and agricultural lands may contribute to:

- dust nuisance affecting nearby dwellings;
- airborne particulate exposure;
- reduced local air quality;
- sediment mobilisation;
- and cumulative environmental disturbance throughout the construction programme.

The proposed works would also involve substantial heavy construction traffic movement along constrained rural roads characterised by dispersed residential occupation, agricultural activity and limited separation distances between the carriageway and nearby properties.

The applicant's own documentation confirms the likelihood of substantial excavation and rock-breaking operations during the construction phase.

Particular concern also arises regarding:

- storage and handling of excavated materials;
- prolonged rock-breaking operations;
- movement of heavy machinery and construction traffic;

- and repeated excavation and reinstatement activity occurring throughout multiple sections of the route corridor.

Particular concern also arises regarding diesel exhaust emissions, prolonged machinery idling, construction vehicle queuing and cumulative air quality impacts associated with repeated stop/go traffic management arrangements occurring within constrained rural roads in close proximity to residential properties.

The Concern Group respectfully submits that insufficient assessment has been undertaken regarding cumulative exposure to diesel particulate matter and construction-related air pollution affecting nearby residential receptors throughout the construction programme.

The Concern Group respectfully submits that insufficient information has been provided regarding:

- route-specific dust monitoring arrangements;
- cumulative dust exposure affecting nearby residents;
- management of fine particulate emissions during excavation and rock-breaking operations;
- and contingency measures where unacceptable dust levels arise during construction activity.

Particular concern also arises regarding potential contamination risks associated with fuels, hydrocarbons, drilling fluids, bentonite, accidental spillages and sediment-laden runoff interacting with vulnerable groundwater pathways and drainage systems throughout the receiving environment.

The HDD assessment documentation acknowledges the risk of drilling instability and drilling fluid loss within fractured and fissured geological conditions. The Concern Group respectfully submits that insufficient certainty has been provided regarding:

- containment of drilling fluids;
- management of accidental releases;
- and protection of groundwater and surface water receptors within the receiving environment.

Hydrological and groundwater matters are addressed separately in Chapter 8 (Hydrology, Groundwater, Karst Geology and Water Environment).

Accordingly, the Concern Group respectfully submits that the likely pollution, dust, air quality and construction contamination risks associated with the proposed development have not been adequately assessed within the EIAR.

10.4 Environmental Risk, Hazard Interaction and Infrastructure Sensitivity

The proposed underground cable corridor would interact with existing road infrastructure, drainage systems, groundwater pathways, agricultural lands, utility infrastructure and high-pressure gas infrastructure throughout the receiving environment.

The Concern Group respectfully submits that prolonged excavation, HDD operations, trenching activity and utility interaction works within constrained rural roads and environmentally sensitive areas give rise to significant environmental risk and infrastructure sensitivity concerns.

Particular concern arises regarding the cumulative environmental and safety implications associated with prolonged construction activity occurring in close proximity to:

- vulnerable groundwater pathways;
- drainage infrastructure;
- residential properties;
- agricultural lands;
- and existing strategic utility infrastructure.

The Concern Group respectfully submits that insufficient assessment has been undertaken regarding:

- environmental risk associated with prolonged excavation activity;
- cumulative utility interaction;
- emergency response arrangements;
- contingency measures in the event of infrastructure-related incidents;
- and the interaction between construction activity and existing gas infrastructure.

The applicant's own documentation further confirms that aspects of the final cable alignment, infrastructure separation distances and utility coordination arrangements remain subject to detailed design and further assessment.

The Concern Group respectfully submits that unresolved alignment and utility coordination matters introduce further uncertainty regarding:

- environmental risk exposure;
- cumulative infrastructure interaction;
- groundwater contamination pathways;
- and the practical management of environmental incidents during construction activity.

Particular concern also arises regarding the interaction between HDD operations, underground utility infrastructure and environmentally sensitive receptors within the receiving environment.

The Concern Group further submits that insufficient information has been provided regarding:

- environmental incident response procedures;
- independent environmental monitoring;
- emergency containment measures;
- and long-term environmental management arrangements associated with the proposed infrastructure.

The applicant's documentation also confirms ongoing design development and unresolved utility coordination matters within sections of the route corridor. The Concern Group respectfully submits that these unresolved matters further increase uncertainty regarding the practical management of environmental risk throughout the construction phase.

Hydrological and groundwater matters are addressed separately in Chapter 8 (Hydrology, Groundwater, Karst Geology and Water Environment), while traffic and construction impacts are addressed further in Chapter 4 (Traffic, Construction and Road Infrastructure).

The Concern Group further submits that insufficient information has been provided regarding long-term operational environmental risk associated with permanent high-voltage electrical infrastructure, including fault-response procedures, emergency maintenance interventions, operational noise management, equipment replacement activity and the potential environmental implications associated with electrical infrastructure incidents within a groundwater-sensitive rural environment.

Permanent underground joint bays, future maintenance access requirements and long-term utility occupation of constrained local roads may create enduring operational and infrastructure management implications extending beyond the temporary construction phase.

Accordingly, the Concern Group respectfully submits that the environmental risk and infrastructure interaction implications associated with the proposed development have not been adequately assessed within the EIAR.

10.5 Cumulative Pollution and Environmental Effects

The Concern Group respectfully submits that the proposed development cannot be assessed in isolation from:

- the proposed generating station;

- associated gas infrastructure;
- AGI infrastructure;
- traffic and road infrastructure impacts;
- drainage and groundwater interaction;
- and wider project-related construction activity within the receiving environment.

The cumulative interaction between prolonged construction activity, excavation and rock-breaking operations, traffic and machinery movement, lighting impacts, air quality effects, hydrological disturbance and long-term infrastructure occupation has the potential to result in significant cumulative effects affecting residents, ecological receptors and the wider rural landscape.

Particular concern arises regarding cumulative impacts affecting:

- residential amenity;
- groundwater-sensitive areas;
- ecological corridors and biodiversity features;
- drainage systems and water pathways;
- and the long-term environmental quality of the receiving environment.

The Concern Group respectfully submits that the proposed underground cable corridor, associated substation infrastructure and related construction activity would occur within an already evolving rural environment characterised by increasing infrastructure pressure, commuter-related development and existing strategic infrastructure concentration throughout the wider Athenry and Cashla area.

Particular concern also arises regarding the cumulative interaction between:

- repeated trench excavation and reinstatement activity;
- prolonged construction disturbance;
- lighting and operational infrastructure;
- traffic and machinery movement;
- and multiple infrastructure systems operating within constrained rural roads and environmentally sensitive areas.

The Concern Group further submits that insufficient consideration has been given to:

- cumulative exposure to prolonged construction disturbance;
- cumulative pollution and contamination risk;
- cumulative infrastructure intensification;

- and the interaction between multiple infrastructure systems within an established rural-residential environment.

The Concern Group respectfully submits that insufficient consideration has been given to the cumulative interaction between noise exposure, vibration disturbance, diesel emissions, airborne particulates, prolonged construction disruption and stress-related effects affecting residents living in close proximity to the proposed works corridor over an extended construction period.

Particular concern also arises regarding the cumulative interaction between the proposed development and other infrastructure proposals affecting sections of the same receiving environment, including the proposed Gannow Wind Farm grid connection project (Galway County Council Ref. 2561412; ABP Ref. PL07.500493).

Hydrological and groundwater impacts are addressed separately in Chapter 8 (Hydrology, Groundwater, Karst Geology and Water Environment), while biodiversity and ecological matters are addressed further in Chapter 7 (Biodiversity, Ecology and Natural Environment).

Geological disturbance, excavation stability and land integrity impacts associated with prolonged trenching and infrastructure installation are addressed further in Chapter 9 (Soils, Geology, Excavation and Land Stability).

The Concern Group respectfully submits that the EIAR does not clearly demonstrate that a robust worst-case assessment has been undertaken regarding simultaneous construction activity, prolonged rock-breaking operations, HDD drilling fluid loss events, cumulative traffic congestion, equipment failure scenarios or environmental incident response capacity within constrained rural roads and groundwater-sensitive areas.

The EIAR does not clearly establish how overlapping construction scenarios affecting the same constrained rural road network would be practically managed without materially increasing cumulative environmental exposure.

The Concern Group respectfully submits that the acknowledged hydrogeological sensitivity, unresolved utility coordination matters, reliance on construction-stage mitigation and uncertainty regarding final alignment and excavation conditions require application of the precautionary principle during assessment of the proposed development. In circumstances where significant uncertainty remains regarding environmental risk pathways, groundwater interaction, construction disturbance and cumulative infrastructure effects, the EIAR should demonstrate a high degree of scientific certainty regarding the effectiveness of proposed mitigation and environmental protection measures.

The Concern Group respectfully submits that the EIAR repeatedly relies upon mitigation measures, monitoring regimes, construction management plans, operational controls and future contractor compliance in order to reduce acknowledged environmental impacts to acceptable

levels. In circumstances where substantial excavation, HDD operations, rock-breaking activity and prolonged construction disturbance would occur within constrained rural roads and environmentally sensitive areas, significant uncertainty remains regarding the practical implementation, enforceability and long-term effectiveness of these mitigation measures.

Accordingly, the Concern Group respectfully submits that the cumulative pollution, noise and environmental implications of the wider Cashla Peaker Project and associated infrastructure have not been adequately assessed within the EIAR.

10.6 Conclusion

The Concern Group respectfully submits that the proposed development gives rise to significant pollution, noise and environmental risk concerns which have not been adequately assessed within the application documentation.

The proposed development would involve prolonged excavation, trenching, HDD operations, road-opening works, heavy construction traffic, rock-breaking activity and permanent infrastructure development within an environmentally sensitive rural landscape characterised by residential occupation, ecological and hydrogeological sensitivity and constrained rural roads with limited separation distances between residential properties and the proposed works corridor.

The Concern Group respectfully submits that insufficient consideration has been given to:

- construction noise and vibration impacts;
- route-specific baseline noise conditions;
- dust and air quality impacts;
- drilling fluid and contamination risks;
- cumulative environmental disturbance;
- emergency response and environmental incident management;
- and cumulative environmental effects arising from the wider Cashla Peaker Project and associated infrastructure.

Particular concern arises regarding the extent to which prolonged construction activity occurring in close proximity to residential properties, groundwater-sensitive areas, drainage systems and ecological receptors may contribute to cumulative environmental disturbance throughout the receiving environment.

The Concern Group further submits that unresolved utility coordination matters, evolving design requirements and acknowledged environmental constraints introduce additional

uncertainty regarding environmental risk management and the practical implementation of mitigation measures during the construction phase.

The Galway County Development Plan 2022–2028 includes objectives relating to protection of residential amenity, environmental quality, groundwater resources and sustainable management of development impacts within rural areas. The Concern Group respectfully submits that the likely environmental impacts identified above are inconsistent with these objectives.

Accordingly, the Concern Group respectfully submits that the EIAR materially underestimates the likely pollution, noise and environmental risks associated with the proposed development and does not provide a sufficiently robust, precautionary, or cumulative assessment of prolonged infrastructure development within the receiving environment.

11 Lighting and Night-Time Impacts

11.1 Introduction

The Concern Group respectfully submits that the proposed development would give rise to significant lighting and night-time impacts arising from permanent and temporary infrastructure illumination associated with the proposed 220kV substation, underground cable corridor works and the wider Cashla Peaker Project.

The proposed development is located within an established rural-residential environment characterised by dispersed housing, agricultural land use, low ambient lighting levels and a predominantly dark rural night-time landscape. The surrounding townlands of Rathmorrissy, Pollnagroagh, Moanbaun, Castlelambert, Knocknacreeva, Caraunduff, Caherbriskaun, Lisheenkyle East, Barrettspark and Cashla comprise a settled rural environment where existing night-time conditions remain relatively free from significant artificial illumination.

The Concern Group respectfully submits that the receiving environment is particularly sensitive to artificial lighting impacts having regard to:

- the dispersed pattern of residential occupation throughout the surrounding townlands;
- the rural landscape character of the area;
- the low existing background lighting environment;
- and the increasing cumulative infrastructure pressure affecting the wider Athenry and Cashla area.

The proposed development would introduce permanent lighting infrastructure associated with:

- the proposed 220kV substation compound;
- operational and security lighting;
- access roads and infrastructure;
- telecommunications infrastructure;
- and associated operational activity.

In addition, the proposed underground cable corridor and associated construction works would give rise to temporary lighting impacts associated with trench excavation, HDD operations, traffic management, construction compounds, heavy machinery and prolonged construction activity extending across multiple townlands and constrained rural roads.

The Concern Group respectfully submits that the cumulative interaction between:

- permanent substation lighting;
- construction-phase lighting;
- security lighting;
- vehicle headlights and machinery lighting;
- telecommunications infrastructure;
- and wider infrastructure intensification has the potential to materially alter existing rural night-time conditions and contribute to the progressive industrialisation of the receiving environment.

Particular concern arises regarding the extent to which the proposed development may give rise to:

- glare and light spill affecting nearby residential properties;
- increased night-time visibility of infrastructure within the rural landscape;
- cumulative visual urbanisation effects;
- disturbance of residential amenities and rural character;
- and ecological disturbance associated with increasing artificial illumination within a currently low-light rural environment.

The Concern Group further notes that concerns regarding visual intrusion, infrastructure intensification and rural landscape sensitivity are not new within the receiving environment.

Previous infrastructure proposals affecting the wider Cashla and Athenry area, including Galway County Council Planning Ref. 17/1538 and An Bord Pleanála Ref. PL07.302034, identified the sensitivity of the surrounding rural landscape and the importance of protecting residential amenity, visual amenity and rural character from visually intrusive and cumulatively significant infrastructure development. The Concern Group respectfully submits that the

proposed introduction of permanent substation lighting, security lighting, telecommunications infrastructure and associated night-time illumination must therefore be considered within the context of an already increasingly infrastructure-intensive rural environment characterised by growing infrastructure pressure and cumulative visual change.

Landscape and visual matters are addressed separately in Chapter 12 (Landscape, Visual and Rural Character Impacts), while ecological lighting effects are addressed further in Chapter 7 (Biodiversity, Ecology and Natural Environment).

Accordingly, the Concern Group respectfully submits that the EIAR does not adequately assess the likely cumulative lighting, night-time, residential amenity and rural character impacts associated with the proposed development.

11.2 Construction Lighting and Temporary Night-Time Disturbance

The proposed underground cable corridor and associated infrastructure works would require prolonged construction activity extending across multiple townlands and constrained rural roads over an extended construction programme.

The Construction Methodology documentation confirms that the proposed works would involve trench excavation, HDD operations, traffic management activity, reinstatement works and substantial construction activity occurring throughout the route corridor. The application documentation further confirms that sections of the local road network would be subject to phased occupation, temporary traffic restrictions and prolonged construction activity during the construction phase.

The Concern Group respectfully submits that construction activity occurring during periods of low light or seasonal darkness has the potential to result in significant temporary lighting impacts affecting nearby residents, road users and the wider rural night-time environment.

Particular concern arises regarding:

- temporary lighting associated with trench excavation and reinstatement works;
- lighting adjacent to residential entrances and dwellings;
- traffic management lighting and illuminated signage;
- machinery and vehicle lighting;
- and prolonged night-time disturbance within established rural communities.

Additional concern arises regarding the potential requirement for temporary lighting associated with HDD compounds, joint bay construction, road closure arrangements, utility coordination

works and extended-duration traffic management activity along sections of the underground cable corridor.

The Concern Group respectfully submits that insufficient information has been provided regarding the location, duration, intensity and operational timing of temporary construction lighting and its potential effects on nearby residential properties, roadside ecological corridors and the wider rural night-time environment.

The Concern Group respectfully submits that the cumulative interaction between construction lighting, traffic management activity, vehicle movement and prolonged infrastructure works has the potential to materially alter existing night-time conditions throughout sections of the receiving environment during the construction phase.

Particular concern also arises regarding the practical implications of construction lighting occurring within constrained rural roads characterised by:

- dispersed ribbon development;
- residential entrances located in close proximity to the carriageway;
- limited screening vegetation;
- and low existing ambient lighting conditions.

The Concern Group respectfully submits that insufficient information has been provided regarding:

- the likely extent and intensity of temporary construction lighting;
- duration and timing of lighting exposure affecting nearby residential properties;
- shielding and directional control measures;
- management of glare and light spill;
- and mitigation measures intended to minimise night-time disturbance during construction activity.

Insufficient information has also been provided regarding the extent to which temporary construction lighting may affect ecological receptors, wildlife movement corridors and existing rural night-time character during prolonged construction activity.

Residential amenity impacts associated with prolonged construction activity are addressed further in Chapter 13 (Residential Amenity and Community Impacts), while ecological lighting effects are addressed separately in Chapter 7 (Biodiversity, Ecology and Natural Environment).

Accordingly, the Concern Group respectfully submits that the likely construction-phase lighting and temporary night-time impacts associated with the proposed development have not been adequately assessed within the EIAR.

11.3 Permanent Lighting Infrastructure and Residential Amenity

The proposed development includes permanent lighting infrastructure associated with the proposed 220kV substation compound, operational and security infrastructure, access arrangements and associated electrical and telecommunications infrastructure.

The EIAR further confirms the inclusion of a 36m telecommunications mast and associated operational infrastructure within the proposed development.

The Concern Group respectfully submits that insufficient visual and photometric information has been provided regarding the operational lighting regime associated with the proposed substation compound and telecommunications infrastructure, including lux levels, lighting column heights, beam orientation, shielding arrangements, motion-activation controls, predicted light spill affecting nearby residential receptors and the wider rural landscape, and the visibility of illuminated infrastructure from surrounding public roads and residential properties.

The Concern Group respectfully submits that the proposed infrastructure has the potential to result in long-term glare, light spill and increased night-time visibility of infrastructure within an established rural landscape characterised by dispersed residential occupation and low existing ambient lighting conditions.

Additional concern arises regarding the extent to which permanent lighting infrastructure may:

- alter existing dark rural night-time conditions;
- increase night-time visibility of infrastructure within the surrounding landscape;
- give rise to glare and light spill affecting nearby dwellings;
- contribute to cumulative visual urbanisation effects;
- and adversely affect residential amenities and rural character over the long term.

The receiving environment is characterised by established residential occupation throughout the surrounding townlands, including dwellings located along local roads and within the wider rural landscape surrounding the proposed substation and underground cable corridor.

The Concern Group respectfully submits that insufficient consideration has been given to the extent to which permanent lighting infrastructure may affect:

- nearby residential properties and residential amenities;
- long-term night-time experience of the surrounding landscape;
- rural character and visual sensitivity;

- and the cumulative interaction between permanent illumination and existing low-light rural conditions.

Particular concern also arises regarding the cumulative interaction between:

- permanent substation lighting;
- security lighting;
- telecommunications infrastructure;
- operational activity;
- traffic movement;
- and associated infrastructure intensification within the wider Cashla and Athenry area.

The Concern Group respectfully submits that insufficient information has been provided regarding lighting intensity levels, hours of operation, shielding and directional control measures, residual sky glow effect and the long-term cumulative interaction between permanent lighting infrastructure and the wider Cashla Peaker Project.

Landscape and visual matters are addressed separately in Chapter 12 (Landscape, Visual and Rural Character Impacts), while residential amenity impacts are addressed further in Chapter 13 (Residential Amenity and Community Impacts).

Accordingly, the Concern Group respectfully submits that the likely long-term lighting and residential amenity impacts associated with the proposed development have not been adequately assessed within the EIAR.

11.4 Ecological and Environmental Lighting Effects

The Concern Group respectfully submits that artificial lighting associated with the proposed development has the potential to give rise to ecological disturbance affecting wildlife movement, ecological connectivity, foraging behaviour, breeding activity and the wider ecological functioning of the receiving environment.

The proposed underground cable corridor and associated infrastructure traverse an established rural landscape characterised by hedgerows, roadside vegetation, drainage features and interconnected habitat corridors which may function as ecological movement routes within the wider agricultural landscape.

The Concern Group respectfully submits that the cumulative interaction between:

- permanent lighting infrastructure;

- construction lighting;
- traffic and machinery movement;
- telecommunications infrastructure;
- and ongoing infrastructure activity has the potential to alter existing ecological conditions and night-time environmental character over time.

Particular concern arises regarding the extent to which increased artificial illumination may:

- disturb wildlife movement patterns;
- affect nocturnal and crepuscular species;
- alter habitat usage and foraging activity;
- contribute to fragmentation of ecological corridors;
- and reduce the ecological value of existing dark rural conditions within the surrounding landscape.

The Concern Group respectfully submits that the predominantly low-light rural character of the receiving environment increases ecological sensitivity to artificial lighting and night-time disturbance. This is particularly relevant in relation to bat foraging and commuting behaviour, hedgerow connectivity and disturbance of nocturnal ecological activity within the wider agricultural landscape.

Appendix F further identifies the existence of ecological commuting corridors and protected species records within the wider Rathmorrissey landscape which may be sensitive to artificial illumination and lighting fragmentation effects.

Particular concern also arises regarding the absence of detailed assessment relating to:

- ecological sensitivity to artificial lighting;
- disturbance associated with night-time operational activity;
- cumulative lighting impacts on biodiversity corridors;
- and the long-term ecological implications associated with increasing artificial illumination within the wider rural landscape.

The Concern Group further submits that insufficient certainty has been provided regarding the effectiveness of proposed mitigation measures intended to minimise ecological and environmental lighting impacts over the operational lifespan of the proposed development.

Broader biodiversity and ecological matters are addressed separately in Chapter 7 (Biodiversity, Ecology and Natural Environment).

Accordingly, the Concern Group respectfully submits that the ecological implications of increased artificial illumination and prolonged night-time infrastructure activity have not been adequately assessed within the EIAR.

11.5 Cumulative Night-Time and Landscape Effects

The Concern Group respectfully submits that the proposed development cannot be assessed in isolation from:

- the proposed generating station;
- associated gas infrastructure;
- AGI infrastructure;
- associated electrical infrastructure;
- and wider project-related development affecting the surrounding rural landscape.

The cumulative interaction of permanent lighting infrastructure, construction lighting, traffic and machinery movement, illuminated operational infrastructure, telecommunications infrastructure and ongoing infrastructure intensification has the potential to result in significant cumulative night-time and landscape impacts throughout the wider receiving environment.

Particular concern arises regarding:

- progressive loss of dark rural night-time character;
- increased night-time visibility of infrastructure;
- incremental sky glow and erosion of existing dark-sky conditions;
- cumulative visual urbanisation effects;
- and long-term alteration of the rural landscape arising from increasing infrastructure concentration within the wider Cashla and Athenry area.

The Concern Group respectfully submits that insufficient consideration has been given to the cumulative impact of increasing artificial illumination within an established rural-residential landscape characterised by low ambient lighting conditions, dispersed residential occupation and high sensitivity to night-time visual change.

The EIAR further states that the preferred grid connection option was selected in part due to considerations relating to future expansion and extendibility.

The Concern Group respectfully submits that this raises additional concern regarding the potential long-term intensification of strategic electrical infrastructure within the receiving

environment and the extent to which the proposed development may facilitate future infrastructure expansion beyond that presently assessed within the application documentation.

Additional concern also arises regarding the extent to which the cumulative interaction between substation lighting, security lighting, construction activity, telecommunications infrastructure, traffic movement and associated infrastructure development may contribute to ongoing industrialisation and visual intensification of the wider rural landscape over time.

The Concern Group further submits that the cumulative night-time effects of the proposed development are particularly significant having regard to the existing strategic infrastructure already present within the wider receiving environment, including motorway infrastructure, electricity transmission infrastructure and gas infrastructure.

Landscape and visual impacts are addressed separately in Chapter 12 (Landscape, Visual and Rural Character Impacts).

Accordingly, the Concern Group respectfully submits that the cumulative lighting and night-time implications of the wider Cashla Peaker Project and associated infrastructure have not been adequately assessed within the EIAR.

11.6 Conclusion

The Concern Group respectfully submits that the proposed development gives rise to significant lighting and night-time concerns which have not been adequately assessed within the application documentation.

The proposed development would introduce permanent lighting infrastructure, construction lighting, illuminated operational infrastructure and increased night-time activity within an established rural landscape characterised by dispersed residential occupation, agricultural land use, low ambient lighting conditions and a predominantly dark rural night-time character.

The Concern Group respectfully submits that insufficient consideration has been given to:

- construction-phase lighting impacts;
- glare and light spill affecting nearby residential properties;
- long-term night-time visual effects;
- impacts on rural landscape character;
- ecological disturbance associated with artificial lighting;
- and cumulative lighting impacts arising from the wider Cashla Peaker Project and associated infrastructure.

Particular concern arises regarding the extent to which increasing artificial illumination, security lighting, telecommunications infrastructure and operational activity may contribute to the progressive urbanisation and industrialisation of the surrounding rural landscape over time.

The Galway County Development Plan 2022–2028 includes objectives relating to the protection of rural landscape character, residential amenity, visual sensitivity and the control of unnecessary artificial illumination within rural areas. The Concern Group respectfully submits that the likely cumulative lighting and night-time effects identified above are inconsistent with these objectives.

Accordingly, the Concern Group respectfully submits that the EIAR materially underestimates the likely lighting, night-time and residential amenity impacts associated with the proposed development and does not provide a sufficiently robust cumulative assessment of increasing infrastructure-related illumination within this sensitive rural receiving environment.

12 Landscape, Visual and Rural Character Impacts

12.1 Introduction

The Concern Group respectfully submits that the proposed development would give rise to significant landscape, visual and rural character impacts arising from the proposed 220kV substation compound, underground cable corridor, telecommunications infrastructure, permanent electrical infrastructure and associated construction activity within a long-established agricultural and rural-residential landscape.

The concerns raised within this chapter should also be read in conjunction with the independent LVIA Peer Review contained within Appendix A.

The proposed development is located within a predominantly agricultural and rural-residential environment characterised by dispersed settlement patterns, agricultural land use, hedgerow field boundaries, local road networks and established rural landscape character throughout the surrounding townlands of Rathmorrissey, Pollnagroagh, Moanbaun, Castlelambert, Knocknacreeva, Caraunduff, Caherbriskaun, Lisheenkyle East, Barrettspark and Cashla.

The Concern Group respectfully submits that the receiving environment is particularly sensitive to infrastructure-related landscape change having regard to the extent of existing residential occupation, the open and gently undulating agricultural landscape character of the area and the increasing concentration of strategic infrastructure within the wider Athenry and Cashla area, including motorway infrastructure, electricity transmission infrastructure and gas infrastructure.

Particular concern arises regarding the cumulative interaction between:

- permanent substation infrastructure;
- telecommunications infrastructure;
- construction compounds and excavation activity;
- roadside infrastructure intervention;
- security fencing and lighting;
- and associated infrastructure intensification within an established rural landscape currently characterised by predominantly agricultural and rural land use.

The Concern Group further notes that concerns regarding cumulative visual intrusion, infrastructure concentration and rural landscape sensitivity have previously arisen within the wider receiving environment, including in relation to Galway County Council Planning Ref. 17/1538 and An Bord Pleanála Ref. PL07.302034.

The proposed underground cable corridor would also require prolonged trenching, excavation, road occupation and reinstatement activity extending across multiple townlands and constrained rural roads over an extended construction programme. The Concern Group respectfully submits that these works have the potential to result in prolonged temporary visual disturbance, alteration of roadside landscape character and cumulative disruption affecting the wider rural environment.

Additional concern arises regarding the extent to which the proposed development may contribute to the ongoing industrialisation and visual intensification of the surrounding rural landscape when considered cumulatively with the wider Cashla Peaker Project and associated infrastructure.

Lighting and night-time impacts are addressed separately in Chapter 11 (Lighting and Night-Time Impacts), while biodiversity and ecological matters are addressed further in Chapter 7 (Biodiversity, Ecology and Natural Environment).

Accordingly, the Concern Group respectfully submits that the EIAR does not adequately assess the likely cumulative landscape, visual and rural character impacts associated with the proposed development.

12.2 Existing Landscape Character and Visual Sensitivity

The Concern Group respectfully submits that the existing landscape character and visual sensitivity of the area have not been fully reflected within the EIAR assessment.

The proposed development is located within an established agricultural and rural-residential landscape characterised by dispersed one-off housing, agricultural fields, hedgerow boundaries, local road corridors and long-established patterns of rural settlement and land use. The surrounding landscape comprises a lived rural environment where residential occupation, farming activity and daily interaction with the surrounding countryside form an integral part of the existing landscape character.

The receiving environment is also characterised by:

- extensive residential occupation throughout the surrounding townlands;
- agricultural activity and associated farm infrastructure;
- established roadside vegetation and hedgerow networks;
- local drainage features and field boundaries;
- and a relatively open rural landscape with intermittent long-distance views across the surrounding countryside.

Sections of the receiving environment are characterised by enclosed rural road corridors bounded by mature roadside trees and established vegetation structures.



Figure 12.1 - Representative example of established roadside vegetation, mature tree cover and hedgerow enclosure within the receiving environment, demonstrating the intimate rural character, existing visual screening and ecological corridor function of the affected road network.

The Concern Group respectfully submits that the visual sensitivity of the receiving environment is materially increased by the extent of dispersed residential occupation and the close relationship between local roads, residential properties and the surrounding rural landscape.

Particular regard should also be had for the established motorway landscape planting associated with the M17/M18 corridor. Trees and planting were originally installed as Specific Landscape Measures (SLM) to reduce visual and environmental impacts associated with motorway construction and operation. Following approximately 17 years of growth and establishment, this planting can no longer reasonably be characterised as temporary mitigation vegetation.

The Concern Group respectfully submits that the motorway planting now constitutes mature landscape infrastructure intentionally established to provide long-term visual screening, landscape integration, ecological connectivity, biodiversity support and environmental

buffering within the wider receiving environment. The removal, severance or degradation of this established planting would materially alter the existing landscape character, visual amenity and environmental function presently experienced throughout the area.



Figure 12.2 - Representative example of mature motorway landscape planting associated with the M6 corridor demonstrating established vegetation structure, landscape integration, ecological screening and long-term environmental buffering within the receiving environment.

The Concern Group further submits that removal, fragmentation or disturbance of these established planting corridors during construction activity would therefore constitute a permanent landscape and amenity impact rather than a temporary construction effect. Such impacts may materially reduce existing visual screening, landscape integration and acoustic buffering currently experienced by nearby residents, road users and the wider rural environment.

Particular concern arises regarding the extent to which the EIAR assessment appears to treat sections of the receiving environment primarily as infrastructure corridors while insufficiently

recognising the established residential, agricultural and community relationship with the surrounding landscape.

The Athenry Town Centre First Plan (Appendix D) further recognises the evolving residential and commuter-related character of the wider Athenry area together with the importance of maintaining environmental quality, landscape character and quality of life within the wider receiving environment.

The Concern Group further submits that the wider Athenry and Cashla area has already experienced substantial strategic infrastructure development, including motorway infrastructure, electricity transmission infrastructure and gas infrastructure. In this context, the cumulative visual sensitivity of the surrounding landscape is significantly greater than may be reflected within the EIAR.

The historical evolution of the receiving environment is also of material relevance. Historical mapping and aerial imagery referenced in Appendix C demonstrate that the Rathmorrissey area underwent gradual drainage, reclamation and agricultural adaptation over an extended historical period.

The Concern Group respectfully submits that the existing landscape character therefore reflects gradual historical evolution and incremental rural land-use change rather than abrupt large-scale strategic infrastructure intervention.

Particular concern also arises regarding the extent to which the proposed development may alter:

- the established rural character of local road corridors;
- the visual amenity of surrounding residential properties;
- the agricultural landscape pattern of the area;
- and the wider perception of the surrounding countryside as a predominantly rural and agricultural environment.

The Concern Group respectfully submits that insufficient weight has been given within the EIAR to the visual sensitivity of the receiving environment having regard to:

- the extent of dispersed residential occupation;
- the open and accessible nature of the surrounding landscape;
- the cumulative presence of existing infrastructure;
- and the evolving rural-residential character of the wider Athenry commuter hinterland.

The Concern Group further notes the relevance of the Galway County Development Plan 2022–2028, including policies relating to protection of rural character, landscape sensitivity, residential amenity and appropriate management of development within the countryside.

Accordingly, the Concern Group respectfully submits that the receiving environment is materially more visually and environmentally sensitive than reflected within the EIAR landscape and visual assessment.

12.3 Construction and Temporary Visual Effects

The proposed underground cable corridor and associated infrastructure works would require prolonged construction activity extending across multiple townlands and constrained rural roads over an extended construction programme.

The application documentation confirms that the proposed works would involve trench excavation, HDD operations, road-opening works, reinstatement activity, traffic management measures, construction compounds, heavy machinery operation and prolonged occupation of sections of the local road network throughout the construction phase.

The Concern Group respectfully submits that the scale, duration and sequential nature of the proposed construction activity has the potential to result in significant temporary visual disturbance throughout the receiving environment.

Particular concern arises regarding the visual impact of prolonged trench excavation and reinstatement operations occurring along local roads and in close proximity to residential properties, agricultural entrances and established roadside vegetation throughout the route corridor.

The proposed works would also require temporary traffic management infrastructure, construction compounds, barriers, fencing, signage, heavy construction plant and associated machinery movement extending across multiple sections of the receiving environment over the duration of the construction programme.

The Concern Group respectfully submits that the proposed construction works would materially alter the visual character of affected local roads and surrounding rural areas during the construction phase, particularly within sections characterised by ribbon development, residential entrances and established roadside landscape features.

The Concern Group further submits that insufficient consideration has been given to the cumulative interaction between:

- construction activity;
- road occupation;
- temporary lighting;
- machinery movement;
- and traffic management operations occurring simultaneously throughout multiple sections of the receiving environment.

The application documentation further confirms the likely requirement for substantial excavation activity and potential rock-breaking operations associated with shallow bedrock and karst limestone conditions identified within the receiving environment. The Concern Group respectfully submits that these activities have the potential to intensify temporary visual disturbance and landscape disruption throughout the construction programme.

The proposed construction activity would occur within an established rural landscape characterised by daily residential movement, agricultural activity, school-related traffic and ongoing community use of the affected road network. The Concern Group respectfully submits that the visual and environmental experience of prolonged infrastructure construction within this lived rural environment has not been adequately reflected within the EIAR assessment.

Particular concern also arises regarding the extent to which repeated roadside excavation, reinstatement operations and temporary infrastructure occupation may contribute to:

- visual degradation of local road corridors;
- disruption of established rural landscape character;
- temporary erosion of residential amenity;
- and cumulative alteration of the wider visual environment during the construction phase.

Residential amenity impacts associated with construction activity are addressed separately in Chapter 13 (Residential Amenity and Community Impacts), while traffic and road infrastructure impacts are addressed further in Chapter 4 (Traffic, Construction and Road Infrastructure).

Accordingly, the Concern Group respectfully submits that the likely temporary visual and landscape impacts associated with the proposed construction works have not been adequately assessed within the EIAR.

12.4 Permanent Infrastructure and Landscape Effects

The proposed development includes substantial permanent infrastructure comprising the proposed 220kV substation compound, telecommunications infrastructure, lighting infrastructure, security infrastructure, permanent access arrangements and associated electrical infrastructure within an established rural landscape.

The EIAR further confirms the inclusion of a 36m telecommunications mast together with associated operational and security infrastructure as part of the proposed development.

The Concern Group further notes that the proposed 36m telecommunications mast would constitute one of the tallest permanent vertical structures associated with the wider integrated Cashla Peaker Project and would exceed the height of certain other operational infrastructure elements within the receiving environment, thereby increasing its visual prominence across the surrounding rural landscape

The Concern Group respectfully submits that the proposed infrastructure has the potential to give rise to significant and long-term landscape and visual effects arising from the introduction of industrial-scale infrastructure into a predominantly agricultural and rural-residential environment.

Particular concern arises regarding the extent to which the proposed development may:

- increase the visual prominence of infrastructure within the surrounding landscape;
- alter the established rural character of the area;
- contribute to cumulative infrastructure concentration ;
- and contribute to the progressive visual intensification of the wider Cashla and Athenry landscape over time.

The proposed substation compound, security fencing, lighting infrastructure and telecommunications mast would introduce visually prominent built elements into a landscape currently characterised by agricultural fields, hedgerow boundaries, dispersed residential occupation and relatively low levels of vertical infrastructure.

The Concern Group is also concerned that the visual material and viewpoints presented within the EIAR do not adequately convey the true scale, height, massing and visual prominence of the proposed infrastructure within the receiving environment. In particular, the absence of meaningful 3D visualisations, realistic photomontages and cumulative visual representations makes it difficult for affected residents and members of the public to fully understand the real-world appearance and visual impact of the proposed substation, telecommunications mast, stack, lighting infrastructure and associated development within the surrounding rural landscape.

The Concern Group respectfully submits that insufficient consideration has been given to the cumulative visual interaction between:

- the proposed substation compound;
- the telecommunications mast;
- lighting infrastructure;
- security infrastructure;
- existing transmission infrastructure;
- motorway infrastructure;
- and associated development throughout the wider receiving environment.

The Concern Group further submits that the application documentation does not provide clear integrated three-dimensional visualisations or combined landscape representations capable of allowing affected residents and members of the public to fully understand the likely cumulative visual prominence, scale and spatial interaction of the proposed substation, telecommunications mast and associated infrastructure within the receiving environment.

Particular concern also arises regarding the extent to which the proposed infrastructure may affect:

- views from nearby residential properties;
- local road corridors and approaches;
- the wider rural landscape setting;
- and the visual experience of residents and road users throughout the surrounding townlands.

The Concern Group further submits that the EIAR places significant reliance upon landscape mitigation measures, screening and planting proposals while insufficiently assessing the long-term visual implications associated with retaining substantial electrical and telecommunications infrastructure permanently within the receiving environment.

The historical evolution of the landscape surrounding Rathmorrissy and Cashla demonstrates gradual agricultural and rural landscape development over an extended historical period. The Concern Group respectfully submits that the introduction of permanent strategic infrastructure of this scale would represent a substantial and lasting alteration of the established landscape character of the area.

Particular concern also arises regarding the cumulative visual implications of the proposed development when considered together with the wider Cashla Peaker Project and associated infrastructure, including gas infrastructure, electricity infrastructure and ongoing strategic infrastructure intensification throughout the wider area.

Lighting and night-time effects are addressed separately in Chapter 11 (Lighting and Night-Time Impacts).

Accordingly, the Concern Group respectfully submits that the likely long-term landscape and visual impacts associated with the proposed development have not been adequately assessed within the EIAR.

12.5 Cumulative Landscape and Rural Character Effects

The Concern Group respectfully submits that the proposed development cannot be assessed in isolation from the wider Cashla Peaker Project and associated infrastructure affecting the surrounding rural landscape.

The receiving environment has already experienced substantial strategic infrastructure development associated with motorway infrastructure, electricity transmission infrastructure, gas infrastructure and ongoing infrastructure intensification throughout the wider Athenry and Cashla area, including cumulative interaction between above-ground infrastructure, roadside intervention and associated visual activity.

The Concern Group respectfully submits that the cumulative interaction between the proposed 220kV substation, underground cable infrastructure, telecommunications infrastructure, security and lighting infrastructure, associated construction activity and existing strategic infrastructure has the potential to result in significant cumulative landscape and rural character effects throughout the receiving environment.

The Concern Group respectfully submits that ongoing infrastructure concentration has the potential to contribute to progressive industrialisation of the rural landscape, cumulative visual urbanisation effects, erosion of rural character and long-term alteration of the visual identity of the surrounding countryside.

The proposed underground cable corridor would also require prolonged trenching, excavation, reinstatement and road occupation activity throughout multiple townlands and constrained rural road corridors. The Concern Group respectfully submits that repeated infrastructure intervention within the same road network has the potential to contribute to cumulative visual degradation and increasing infrastructure dominance throughout the receiving environment.

Particular concern also arises regarding the cumulative interaction between the proposed development and other infrastructure proposals affecting sections of the same local road network, including the proposed Gannow Wind Farm grid connection project (Galway County Council Ref. 2561412; ABP Ref. PL07.500493).

The Concern Group respectfully submits that insufficient consideration has been given to the extent to which repeated infrastructure development may alter the wider perception and experience of the surrounding rural landscape over time, particularly within an area already characterised by increasing strategic infrastructure presence and commuter-related development pressure.

The Galway County Development Plan 2022–2028 recognises the importance of protecting rural character, residential amenity and landscape sensitivity within the countryside. The Concern Group respectfully submits that the cumulative landscape implications of ongoing infrastructure intensification within the wider Athenry and Cashla area are inconsistent with these objectives.

Lighting and night-time impacts are addressed separately in Chapter 11 (Lighting and Night-Time Impacts), while biodiversity and ecological matters are addressed further in Chapter 7 (Biodiversity, Ecology and Natural Environment).

Further concerns regarding the adequacy of the LVIA methodology, cumulative assessment approach and visual sensitivity analysis are identified within the independent peer review contained in Appendix A.

Accordingly, the Concern Group respectfully submits that the cumulative landscape, visual and rural character implications of the proposed development and associated infrastructure have not been adequately assessed within the EIAR.

12.6 Conclusion

The Concern Group respectfully submits that the proposed development would give rise to significant landscape, visual and rural character impacts which have not been adequately assessed within the application documentation.

The proposed development would introduce substantial permanent infrastructure, including the proposed 220kV substation compound, telecommunications infrastructure, lighting infrastructure, security infrastructure and associated electrical infrastructure, within an established rural landscape characterised by dispersed residential occupation, agricultural land use and long-established rural landscape character.

The proposed underground cable corridor would also require prolonged trench excavation, road occupation, reinstatement activity, construction compounds and associated infrastructure works extending across multiple townlands and constrained rural roads over an extended construction programme.

The Concern Group respectfully submits that insufficient consideration has been given to:

- the visual sensitivity of the receiving environment;
- the cumulative impact of increasing infrastructure concentration;
- temporary and long-term alteration of rural landscape character;
- visual impacts affecting nearby residential properties and local roads;
- the cumulative interaction between existing and proposed infrastructure;
- and the long-term industrialisation of the wider Cashla and Athenry landscape.

Particular concern arises regarding the extent to which the proposed development, when considered together with existing strategic infrastructure and associated development within the wider area, may contribute to progressive visual urbanisation, erosion of rural character and long-term transformation of the surrounding countryside.

The proposed development is further inconsistent with the Galway County Development Plan objectives relating to protection of rural landscape character, visual amenity and the avoidance of cumulative landscape industrialisation within sensitive rural receiving environments.

The Concern Group further submits that the likely landscape and visual effects identified above are inconsistent with the objectives of the Galway County Development Plan 2022–2028 relating to:

- protection of rural landscape character;
- safeguarding of residential amenities;
- appropriate management of development within the countryside;
- and protection of visually sensitive rural environments from cumulative infrastructure intensification.

Accordingly, the Concern Group respectfully submits that the EIAR materially underestimates the likely landscape, visual and rural character impacts associated with the proposed development and does not adequately assess the cumulative implications of ongoing infrastructure intensification within the wider Cashla and Athenry rural landscape.

13 Residential Amenity and Community Impacts

13.1 Introduction

The Concern Group respectfully submits that the proposed development gives rise to significant residential amenity and community impacts arising from prolonged construction activity, trenching and road-opening works, traffic disruption and restricted access, substantial

excavation and rock-breaking operations, permanent electrical infrastructure, lighting and visual impacts and cumulative effects associated with the wider Cashla Peaker Project and associated infrastructure proposals.

The proposed development must also be assessed cumulatively with the wider Cashla Peaker Project (ACP Ref. 324113), for which the proposed substation, mast and underground cable infrastructure are intended to provide enabling strategic grid infrastructure.

The proposed underground cable corridor and associated substation infrastructure are located within an established mixed rural-residential environment extending through Rathmorrissy, Pollnagroagh, Moanbaun, Castlambert, Knocknacreeva, Caraunduff, Caherbriskaun, Lisheenkyle East, Barrettspark and Cashla.

The receiving environment comprises an established rural-residential landscape characterised by dispersed and ribbon residential development, agricultural activity, commuter-related movement associated with the Galway fringe and Athenry commuter belt, school-related traffic, local business activity and constrained rural roads with limited alternative access arrangements.

The Concern Group respectfully submits that the application documentation does not adequately assess the cumulative and prolonged impact of the proposed development on residential amenity, daily community life and the wider rural character of the receiving environment during both the construction and operational phases.

Particular concern arises regarding the extent to which the affected roads and surrounding communities are repeatedly assessed within the EIAR primarily as engineering and utility corridors rather than as established lived rural-residential environments characterised by ongoing residential occupation, agricultural activity and daily community movement.

The Regional Spatial and Economic Strategy further emphasises the importance of sustainable communities, quality of life and healthy placemaking within evolving settlement areas throughout the Northern and Western Region.

The Athenry Local Area Plan and Galway County Development Plan 2022–2028 similarly recognise the importance of protecting residential amenity, sustainable community development and quality of life within the wider Athenry settlement area and surrounding rural hinterland.

The Concern Group respectfully submits that prolonged infrastructure occupation, cumulative construction disturbance and increasing industrialisation of the receiving environment are inconsistent with these wider regional objectives.

Traffic and construction management matters are addressed separately in Chapter 4 (Traffic, Construction and Road Infrastructure).

Accordingly, the Concern Group respectfully submits that the likely residential amenity and community impacts associated with the proposed development have been materially underestimated within the EIAR.

13.2 Construction Disturbance and Residential Amenity

The proposed underground cable corridor and associated infrastructure works would require substantial construction activity over an approximate 8.1km route length extending through established residential and agricultural communities.

The application documentation confirms that the proposed works would involve trench excavation and reinstatement operations, temporary road closures and stop/go traffic management systems, HDD operations, substantial excavation activity, installation of permanent underground joint bay infrastructure and likely rock-breaking operations associated with shallow bedrock and karst limestone conditions identified within the application documentation.

The Construction Methodology documentation further confirms that construction works adjacent to residential and property access points may proceed in segmented sections of approximately 2–5 metres in length in order to maintain local access arrangements during trenching operations.

The Concern Group respectfully submits that these works represent a substantial linear infrastructure construction programme occurring within close proximity to established residential properties and settled rural communities.

Particular concern arises regarding:

- construction noise, vibration and dust impacts;
- repeated excavation and reinstatement activity adjacent to residential properties;
- prolonged road occupation and restricted access;
- and cumulative disturbance arising from phased construction activity within settled communities.

The application documentation further confirms that construction works may involve up to 10 electrical and civil construction crews operating simultaneously together with tracked excavators and dumpers, cranes, generators, tractors, trailers and 22-tonne excavators equipped for rock-breaking operations.

The Concern Group respectfully submits that insufficient information has been provided regarding the cumulative residential amenity implications associated with exposure to heavy

construction plant, excavation works, rock-breaking activity and recurring traffic management operations affecting the same communities over extended periods.

Additional concern arises regarding the absence of dedicated baseline residential noise surveys for receptors located along the underground cable corridor.

Unlike the proposed Gannow Wind Farm and associated 38kV grid connection project (Galway County Council Ref. 2561412; ABP Ref. PL07.500493), which included route-specific residential noise monitoring affecting portions of the same road network, the Bord Gáis application does not include equivalent route-specific baseline noise surveys within Rathmorrissey, Moanbaun, Knocknacreeva, Caraunduff and surrounding townlands.

The Concern Group respectfully submits that the absence of route-specific baseline noise monitoring creates significant uncertainty regarding the likely impact of trenching, HDD operations, excavation works and rock-breaking activity on nearby residential receptors.

Particular concern also arises regarding the cumulative interaction between construction noise and vibration, traffic disruption, repeated excavation activity and ongoing community exposure to infrastructure works within an established lived rural-residential environment.

The Concern Group respectfully submits that insufficient consideration has therefore been given to the likely cumulative impact of construction activity on residential amenity, quality of life, enjoyment of residential property and the wider functioning of settled rural communities throughout the construction programme.

13.3 Traffic, Access and Daily Community Movement

The proposed development would require substantial construction traffic, trenching activity and road occupation within constrained rural roads serving established residential communities, agricultural landholdings and local businesses throughout the receiving environment.

The affected road network facilitates residential access, commuter movement, school transport, agricultural activity, emergency access and local business operations throughout the surrounding townlands.

The Athenry Local Transport Plan further highlights existing accessibility, pedestrian safety, cycling infrastructure and congestion challenges within the wider Athenry area.

The wider Athenry area is also the subject of ongoing active travel and walking/cycling infrastructure improvements intended to enhance sustainable mobility, pedestrian safety and community connectivity. The Concern Group respectfully submits that prolonged trenching

activity, recurring road occupation and construction-related traffic disruption along constrained rural roads are difficult to reconcile with these wider policy objectives promoting safe and accessible active travel infrastructure within the Atherny commuter hinterland.

The Concern Group respectfully submits that prolonged construction activity and recurring traffic restrictions associated with the proposed development may further intensify existing movement and accessibility pressures affecting the receiving environment.

Detailed traffic and construction management matters are addressed separately in Chapter 4 (Traffic, Construction and Road Infrastructure).

The EIAR confirms that the proposed works would involve phased trenching operations, temporary road closures, stop/go traffic management systems and prolonged occupation of sections of the local road network throughout the construction programme.

The Concern Group respectfully submits that insufficient assessment has been undertaken regarding:

- repeated disruption affecting residential and agricultural access;
- cumulative delay impacts affecting commuters and school traffic;
- emergency access resilience during periods of active trenching and road occupation;
- interaction between construction traffic and existing local traffic movement;
- and the cumulative effect of recurring traffic restrictions affecting the same communities over extended periods.

Particular concern arises regarding the practical implications of construction activity occurring immediately adjacent to residential entrances, agricultural access points, local businesses, school-related traffic routes and established community access corridors.

The Concern Group respectfully submits that the EIAR materially understates the practical lived impact of recurring road occupation, excavation activity and traffic restrictions affecting residents and local communities throughout the proposed construction programme.

The Concern Group further submits that prolonged traffic management measures and recurring access restrictions may affect the daily functioning of settled rural communities characterised by ongoing agricultural activity, commuter movement and residential occupation.

Particular concern also arises regarding the potential for interruption or disruption to existing electricity supply, telecommunications infrastructure, broadband services and other utility connections during trench excavation, HDD works, reinstatement operations and utility coordination activity along the route corridor. The Concern Group respectfully submits that insufficient consideration has been given to the potential effects of temporary service disruption

on vulnerable residents, remote working arrangements, home-based businesses, agricultural operations and wider day-to-day community functioning within the receiving environment.

Accordingly, the Concern Group respectfully submits that the likely community access and movement impacts associated with the proposed development have not been adequately assessed within the EIAR.

13.4 Visual, Lighting and Rural Character Impacts

The proposed development includes substantial permanent electrical infrastructure including the proposed 220kV substation compound, security infrastructure, permanent lighting infrastructure and a 36m telecommunications mast within an established rural landscape characterised by agricultural land use and dispersed residential development.

The Concern Group respectfully submits that the proposed infrastructure has the potential to give rise to significant visual intrusion, lighting impacts, progressive visual and infrastructural intensification of the rural landscape and adverse effects on residential amenity and rural character.

Detailed assessment of lighting and landscape matters is addressed separately in Chapter 11 (Lighting and Night-Time Impacts) and Chapter 12 (Landscape, Visual and Rural Character Impacts).

Particular concern arises regarding:

- night-time lighting effects;
- visibility of permanent electrical infrastructure;
- long-term proximity of residential receptors to permanent high-voltage electrical infrastructure;
- uncertainty regarding cumulative infrastructure exposure associated with the wider integrated Cashla Peaker Project;
- operational substation lighting;
- mast lighting;
- security lighting;
- cumulative night-time industrialisation;
- cumulative visual impacts associated with the wider Cashla Peaker Project;
- and the progressive transformation of the receiving environment arising from permanent infrastructure development.

The Concern Group respectfully submits that insufficient consideration has been given to the extent to which permanent high-voltage electrical infrastructure may contribute to ongoing residential concern, perceived loss of rural amenity and cumulative infrastructure intensity within the receiving environment. While detailed technical EMF matters are not assessed within this submission, the long-term proximity of permanent strategic electrical infrastructure to established residential communities nonetheless forms part of the wider residential amenity context requiring assessment.

The Concern Group respectfully submits that the cumulative visual presence of permanent infrastructure, lighting and security installations has the potential to adversely affect residential amenity and alter the established rural character of the receiving environment over time.

Particular concern also arises regarding the extent to which the proposed development would contribute to the gradual industrialisation of a rural environment currently characterised by residential occupation, agricultural activity and established rural landscape character.

The Concern Group respectfully submits that insufficient consideration has been given to the cumulative interaction between permanent infrastructure, lighting, traffic movement and wider infrastructure intensification throughout the surrounding rural area.

Accordingly, the Concern Group respectfully submits that the likely visual and residential amenity impacts associated with the proposed development have been materially underestimated within the EIAR.

13.5 Community Cohesion and Quality of Life

The Concern Group respectfully submits that the proposed development has the potential to adversely affect residential amenity, community cohesion, rural living conditions and the overall quality of life of residents within the receiving environment.

The proposed underground cable corridor traverses established rural communities throughout the receiving environment.

The Athenry Town Centre First Plan (Appendix D) further highlights the importance of protecting community wellbeing, accessibility, residential quality of life and sustainable settlement development within the wider Athenry area.

The Concern Group respectfully submits that the cumulative interaction of prolonged construction activity, excavation and road occupation, traffic disruption and restricted access, visual and lighting impacts, permanent infrastructure development and ongoing infrastructure intensification may result in significant long-term effects on the character, amenity and social functioning of the local rural community.

The Concern Group further notes that the applicant's Human Health assessment, including Table 4-19 ('Health Receptor Sensitivity to Health Determinants'), recognises transport disruption, accessibility, noise, vibration and community connectivity as wider determinants of health requiring assessment within the receiving environment

Particular concern arises regarding the cumulative social and quality-of-life effects associated with prolonged infrastructure works occurring over extended periods within settled communities already experiencing increasing development and infrastructure pressure associated with the wider Galway fringe and Athenry commuter belt.

Additional concern arises regarding the absence of detailed consultation concerning prolonged construction activity, traffic disruption, restricted access arrangements and recurring infrastructure works affecting established residential and community environments throughout the receiving environment.

The Concern Group respectfully submits that insufficient consideration has been given to:

- the lived experience of affected residents;
- the cumulative burden imposed upon local communities;
- the extent to which recurring infrastructure intervention may affect long-term residential amenity and community identity within the receiving environment;
- overlapping disturbance;
- cumulative stress;
- prolonged uncertainty;
- and increasing infrastructure intensity throughout the receiving environment.

The concerns raised within this submission reflect the genuine concerns of residents directly affected by the proposed development and associated infrastructure works.

Table 1-2 of the EIAR identifies consultation responses received from statutory and prescribed bodies during the pre-application and consultation process.

However, the Concern Group respectfully submits that insufficient evidence has been provided regarding meaningful engagement with directly affected residents, local businesses, schools, agricultural landowners and rural communities located along the proposed underground cable corridor and surrounding infrastructure areas (Chapter 14 – Community Engagement, Public Participation and Procedural Fairness)

Particular concern arises regarding the extent to which the receiving environment appears to have been assessed primarily through technical, engineering and statutory consultation

processes rather than through meaningful engagement with the established communities directly affected by prolonged construction activity and permanent infrastructure development.

The cumulative interaction between ACP Ref. 324113 and ACP Ref. 324162 contributes to progressive erosion of rural residential character and community amenity.

Accordingly, the Concern Group respectfully submits that the likely community cohesion and quality-of-life impacts associated with the proposed development have not been adequately assessed within the EIAR.

The Concern Group further notes that community concern regarding the proposed development and wider Cashla Peaker Project is substantial and widespread throughout the receiving environment.

A community petition opposing the proposed development and associated infrastructure has been signed by approximately 1,066 persons at the time of submission.

The concerns raised consistently relate to:

- residential amenity impacts;
- traffic and construction disruption;
- noise and lighting impacts;
- environmental and groundwater concerns;
- cumulative infrastructure intensification;
- and the long-term industrialisation of the rural environment.

The Concern Group further submits that the financial and procedural burden associated with reviewing extensive technical documentation and lodging formal observations may also have limited the extent of direct public participation within the receiving environment.

The Concern Group respectfully submits that the scale and consistency of these concerns further demonstrates the sensitivity of the receiving environment and the extent of community opposition arising from the proposed development.

13.6 Conclusion

The Concern Group respectfully submits that the proposed development gives rise to significant residential amenity and community concerns which have not been adequately assessed within the application documentation.

The proposed underground cable corridor and associated infrastructure works would result in significant and recurring disruption within established rural-residential communities arising from excavation activity, traffic restrictions, restricted access, construction disturbance and long-term infrastructure occupation.

The Concern Group respectfully submits that insufficient consideration has been given to:

- the cumulative impact of construction activity on residential amenity and quality of life;
- the extent and duration of construction-related disruption;
- visual and lighting impacts associated with permanent infrastructure;
- cumulative interaction with other infrastructure proposals affecting the same communities;
- and the long-term implications of infrastructure intensification within the receiving environment.

Particular concern arises regarding the extent to which prolonged infrastructure works may affect settled rural communities characterised by residential occupation, agricultural activity, commuter-related movement and ongoing daily community interaction throughout the receiving environment. The cumulative residential and community impacts identified throughout this chapter are inconsistent with the Galway County Development Plan objectives relating to protection of residential amenity, sustainable rural communities and quality of life within evolving rural settlement areas.

The Concern Group further submits that the EIAR insufficiently assesses the practical lived experience of prolonged infrastructure works occurring within settled rural communities characterised by residential occupation, agricultural activity and ongoing daily community movement. Traffic and construction impacts are addressed separately in Chapter 4 (Traffic, Construction and Road Infrastructure), while lighting and landscape matters are addressed further in Chapter 11 (Lighting and Night-Time Impacts) and Chapter 12 (Landscape, Visual and Rural Character Impacts).

Accordingly, the Concern Group respectfully submits that the likely residential amenity, community and quality-of-life impacts associated with the proposed development have been materially underestimated within the EIAR. When considered cumulatively with ACP Ref. 324113, the proposed development would give rise to prolonged infrastructure disturbance and rural residential impacts inconsistent with the proper planning and sustainable development of the area.

14 Community Engagement, Public Participation and Procedural Fairness

The Concern Group respectfully submits that significant concerns arise regarding whether the consultation process achieved the standard of effective public participation envisaged under the Environmental Impact Assessment Directive and the Aarhus Convention.

Effective public participation requires not merely formal access to documentation, but a realistic and practical opportunity for affected communities to understand, assess and respond to the likely significant environmental effects of a proposed development, including cumulative and interrelated effects arising across connected applications.

In particular:

- the extent of direct engagement appears limited having regard to the scale of the affected population and geographical extent of the receiving environment;
- access to information was constrained, including delays in the provision of documentation at Galway County Council local library;
- there is limited evidence demonstrating that community feedback materially influenced the development;
- cumulative assessment documentation was fragmented across interdependent applications;
- the overlapping progression of ACP Ref. 324113 and ACP Ref. 324162, together with the scale, technical complexity, statutory cost and volume of documentation associated with the applications, materially constrained the practical ability of affected residents and community members to engage fully and effectively with the consultation process within the available statutory timeframe;
- and insufficient evidence has been provided of meaningful route-specific engagement with residents, businesses, agricultural operators and schools directly affected by the proposed underground cable corridor and associated infrastructure works.

The Concern Group respectfully submits that fragmentation of cumulative environmental assessment across functionally interdependent applications is inconsistent with the principles of integrated assessment, informed public participation and transparent decision-making recognised under Article 6 of the Aarhus Convention and the Environmental Impact Assessment Directive (Directive 2011/92/EU as amended by Directive 2014/52/EU).

The Concern Group respectfully submits that observations, concerns and environmental assessment issues arising within either ACP Ref. 324113 or ACP Ref. 324162 are materially relevant to the assessment of the wider integrated Cashla Peaker Project as a whole.

The Concern Group further notes the relevance of Article 6(4) of the Aarhus Convention, which requires public participation to occur when all options remain open and before strategic project parameters become effectively fixed through sequential consent processes.

The Concern Group also notes that substantial community concern has arisen regarding the proposed development and associated infrastructure works throughout the receiving environment. Substantial and sustained community concern has already been demonstrated in relation to the wider Cashla Peaker Project, including through opposition to ACP Ref. 324113 and a community petition.

A community petition opposing the proposed Cashla Peaker Plant and associated infrastructure, submitted separately as part of the observation documentation, had reached approximately 1,066 signatories at the time of submission of observations in respect of ACP Ref. 324162. The Concern Group respectfully submits that this petition is directly relevant to the present application, as the proposed substation, telecommunications mast and underground grid connection infrastructure are functionally, physically and operationally linked to ACP Ref. 324113 and form part of the wider integrated Cashla Peaker Project.

The Concern Group respectfully submits that effective public participation was materially constrained by the overlapping progression of ACP Ref. 324113 and the present application (ACP Ref. 324162). Significant community time, resources and attention were necessarily directed toward review of the primary Peaker Plant application under ACP Ref. 324113, while affected residents and community members were afforded only a limited period of approximately three weeks to review, assess and prepare submissions in relation to the separate but functionally interdependent grid connection and associated infrastructure application under ACP Ref. 324162.

The practical effect of overlapping and sequentially intensive strategic infrastructure applications of substantial technical complexity was to significantly restrict the ability of affected residents and community members to engage fully and effectively with the consultation process.

The practical burden imposed upon affected communities was further intensified by the requirement to review extensive technical documentation across overlapping strategic infrastructure applications within compressed statutory participation timelines.

The concerns raised by residents and community members consistently relate to residential amenity, groundwater vulnerability, construction disruption, cumulative infrastructure intensification, landscape impacts and long-term environmental effects associated with the wider integrated Cashla Peaker Project.

The Concern Group respectfully submits that the extent and consistency of these concerns further demonstrates the importance of ensuring transparent cumulative assessment, effective public participation and clear integrated environmental assessment of the wider project.

Insufficient evidence has been provided demonstrating meaningful route-specific engagement with directly affected residents, agricultural operators and businesses having regard to the scale and duration of the proposed construction works and the extent of permanent infrastructure proposed within constrained rural roads.

The Concern Group further submits that the scale, technical complexity and statutory cost associated with participation in strategic infrastructure applications may operate as practical barriers to effective public participation for some affected residents and community members, particularly in circumstances involving extensive technical documentation and multiple interrelated planning applications.

In the specific context of the present application (ACP Ref. 324162), the level of formal submissions received should not necessarily be interpreted as fully reflecting the extent of community concern regarding the wider integrated Cashla Peaker Project and associated infrastructure. The overlapping progression of ACP Ref. 324113 and ACP Ref. 324162, together with the limited timeframe available to review and respond to the present application, materially constrained the practical ability of many affected residents and community members to participate fully in the consultation process.

It is respectfully submitted that effective public participation obligations arising under the Planning and Development Act 2000 (as amended), including the strategic infrastructure provisions of Part 18, must be interpreted consistently with the requirements of the Aarhus Convention and the Environmental Impact Assessment Directive.

The Concern Group further notes the relevance of the judgment in *Holohan v An Bord Pleanála (Case C-461/17)*, which emphasised the requirement for complete, transparent and legally sufficient assessment of all likely significant environmental effects in order to facilitate lawful public participation and informed decision-making.

The Concern Group further notes the relevance of *O’Grianna v An Bord Pleanála [2014] IEHC 632*, which confirmed that related and interdependent elements of an overall project should not be artificially separated in a manner that impedes proper environmental assessment or informed public participation.

The Concern Group respectfully submits that the cumulative environmental, residential and community implications arising from the present application (ACP Ref. 324162), when considered together with the wider integrated Cashla Peaker Project including ACP Ref. 324113, have not been adequately communicated, integrated or assessed through the public consultation process.

Accordingly, the Concern Group respectfully submits that this observation should be understood as relating to the cumulative effects and overall planning implications of the wider integrated Cashla Peaker Project as a whole, rather than to isolated infrastructure elements considered independently

15 Aviation and Telecommunications Infrastructure

15.1 Introduction

The Concern Group respectfully submits that the proposed development gives rise to aviation safeguarding, telecommunications and cumulative infrastructure interaction concerns associated with the proposed 36m telecommunications mast, associated lighting infrastructure and cumulative interaction with the wider Cashla Peaker Project.

The proposed telecommunications mast would introduce additional vertical infrastructure and associated obstacle lighting within a rural environment already characterised by existing electricity transmission infrastructure, motorway infrastructure and ongoing strategic infrastructure intensification.

The proposed telecommunications infrastructure forms part of the wider integrated infrastructure associated with ACP Ref. 324113 and cannot reasonably be assessed in isolation from the proposed generating station and associated electrical infrastructure.

Detailed aviation-related concerns associated with the wider Cashla Peaker Project are addressed separately within submissions relating to ACP Ref. 324113. This chapter addresses aviation and telecommunications matters insofar as they relate to the proposed mast, associated infrastructure and cumulative infrastructure and lighting concerns.

Accordingly, the Concern Group respectfully submits that the EIAR does not adequately assess the aviation and telecommunications implications associated with the proposed development.

15.2 Telecommunications Mast and Infrastructure Interaction

The proposed development includes a permanent 36m telecommunications mast together with associated operational infrastructure and lighting infrastructure within the receiving environment.

The proposed telecommunications mast would introduce additional vertical infrastructure within an already evolving strategic infrastructure landscape and has the potential to contribute to cumulative safeguarding, lighting and visual interaction effects.

Particular concern arises regarding:

- cumulative infrastructure concentration;
- operational and security lighting effects;
- cumulative visual prominence;
- and interaction with wider infrastructure associated with ACP Ref. 324113.

The Concern Group respectfully submits that insufficient information has been provided regarding:

- cumulative aviation safeguarding implications;
- long-term operational interaction;
- future infrastructure interaction;
- cumulative telecommunications and lighting effects;
- and the long-term interaction between obstacle lighting, telecommunications infrastructure and wider strategic infrastructure within the receiving environment.

The application documentation confirms that the Irish Aviation Authority reviewed the proposed telecommunications mast and associated infrastructure and identified the likely requirement for aviation obstacle lighting together with advance notification procedures for crane operations during construction activity.

The Concern Group respectfully submits that this confirms the operational prominence of the proposed telecommunications infrastructure within the receiving environment and demonstrates that the proposed mast gives rise to aviation safeguarding, lighting and cumulative visual considerations extending beyond those typically associated with the existing rural receiving environment.

The Concern Group further notes the proposed 30m telecommunications lattice mast adjacent to the site (GCC Ref. 2561637), which further contributes to cumulative vertical infrastructure concentration and associated visual and lighting interaction within the receiving environment.

Particular concern also arises regarding the cumulative interaction between obstacle lighting, telecommunications infrastructure, substation lighting and wider strategic infrastructure within an established rural landscape characterised by low existing ambient lighting conditions and dispersed residential occupation.

Accordingly, the Concern Group respectfully submits that the likely aviation and telecommunications implications associated with the proposed mast have not been adequately assessed within the EIAR.

15.3 Cumulative Aviation and Infrastructure Effects

The Concern Group respectfully submits that the proposed telecommunications mast cannot reasonably be assessed independently of the wider infrastructure associated with ACP Ref. 324113.

The cumulative interaction between the proposed telecommunications mast, operational and security lighting, electricity infrastructure and associated strategic infrastructure has the potential to give rise to cumulative infrastructure interaction and safeguarding effects greater than those assessed within either application individually.

The Concern Group respectfully submits that insufficient consideration has been given to the cumulative safeguarding, lighting and infrastructure interaction implications arising from increasing infrastructure concentration, telecommunications development and associated lighting infrastructure throughout the wider Athenry and Cashla area.

Accordingly, the Concern Group respectfully submits that the cumulative aviation and safeguarding implications of the wider integrated Cashla Peaker Project have not been adequately assessed within the EIAR.

15.4 Conclusion

The Concern Group respectfully submits that the proposed telecommunications mast and associated infrastructure give rise to aviation safeguarding, telecommunications and cumulative infrastructure interaction concerns which have not been adequately assessed within the application documentation.

Detailed aviation concerns associated with the wider Cashla Peaker Project are addressed separately within submissions relating to ACP Ref. 324113. Nevertheless, the proposed telecommunications infrastructure must be assessed cumulatively as part of the wider integrated strategic infrastructure project.

Accordingly, the Concern Group respectfully submits that the EIAR materially underestimates the cumulative aviation, telecommunications and infrastructure interaction implications associated with the proposed development, particularly when considered cumulatively with the wider Cashla Peaker Project and associated strategic infrastructure.

16 Strategic Utility Infrastructure, Procedural and Proportionality Concerns

16.1 Introduction

This chapter addresses issues arising in relation to the proposed strategic utility works within the public road network, including issues of procedural clarity, proportionality, long-term infrastructure burden and the implications associated with concentrating substantial underground electrical infrastructure within constrained rural roads serving established residential and agricultural communities.

The Concern Group respectfully submits that insufficient clarity has been provided regarding:

- the legal and procedural framework underpinning the proposed underground cable infrastructure;
- the long-term implications associated with permanent occupation of sections of the public road network;
- the interaction between the proposed development and adjoining landowners, residents and road users;
- the cumulative infrastructure burden arising from the wider Cashla Peaker Project;
- and the proportionality of concentrating substantial strategic electricity infrastructure within settled rural communities characterised by constrained road geometry and limited alternative access arrangements.

The affected road network also forms part of the evolving rural mobility and connectivity framework identified within the Athenry Local Area Plan and related active travel objectives, including the longer-term improvement of walking and cycling connectivity within the wider Athenry commuter hinterland. The Concern Group respectfully submits that prolonged occupation of constrained local roads by permanent strategic utility infrastructure may create additional constraints for future road improvement, active travel and rural mobility enhancement measures.

The Concern Group further submits that unresolved aspects of the final cable alignment, infrastructure separation distances and construction methodology increase uncertainty regarding the ultimate extent and operation of the proposed underground cable corridor.

Accordingly, the Concern Group respectfully submits that the issues addressed within this chapter are directly relevant to the proper assessment of the proposed development and its compatibility with proper planning and sustainable development.

16.2 Strategic Utility Infrastructure and Scope of Proposed Works

The application documentation confirms that the proposed development would involve substantial and prolonged construction activity within the public road network, including:

- trench excavation and reinstatement operations;
- installation of permanent underground electrical infrastructure;
- permanent underground joint bay structures;
- temporary road closures and traffic restrictions;
- prolonged occupation of constrained local roads;
- and ongoing future maintenance and infrastructure access requirements.

Table 1-2 of the EIAR demonstrates that the proposed development required extensive consultation with multiple statutory bodies regarding abnormal loads, bridge capacity, road occupation, infrastructure coordination, cumulative impacts and future service conflicts.

The Concern Group respectfully submits that the extent and nature of these issues further demonstrate that the proposed development gives rise to effects more consistent with substantial strategic infrastructure intervention within the receiving environment rather than limited local utility works of a temporary or minor nature.

The consultation responses further demonstrate ongoing concern regarding cumulative infrastructure interaction and long-term occupation of constrained rural road corridors serving established residential and agricultural communities.

The Construction Methodology documentation further confirms that separate road-opening licences would be required from Galway County Council for sections of the proposed underground cable corridor located within the public road network.

The Concern Group respectfully submits that insufficient information has been provided regarding:

- the full extent of proposed permanent underground infrastructure occupation within the public road network;
- future maintenance and access requirements associated with the underground cable infrastructure;
- future road-opening requirements;
- long-term interaction with other underground infrastructure;

- and the cumulative operational implications associated with retaining substantial underground electrical infrastructure within constrained rural roads.

Particular concern arises regarding the extent to which the affected local roads may become subject to repeated future infrastructure intervention, maintenance activity and utility coordination works over the operational lifespan of the proposed development.

Additional concern also arises regarding the increasing concentration of major utility infrastructure within narrow rural roads serving long-established residential and farming communities.

The Concern Group respectfully submits that insufficient assessment has been undertaken regarding the long-term implications of cumulative underground infrastructure occupation, utility coordination requirements and future infrastructure access constraints affecting the receiving environment.

The Concern Group further submits that insufficient consideration has been given to the cumulative interaction between the proposed underground cable corridor and existing or future Uisce Éireann infrastructure requirements, including future water services upgrades, maintenance access and coordinated infrastructure delivery within constrained rural roads serving established residential and agricultural communities.

The Concern Group respectfully submits that insufficient regard has been given to the extent to which the proposed underground cable corridor would contribute to the progressive concentration of strategic utility infrastructure within local rural roads primarily serving established residential, agricultural and community functions.

Particular concern arises regarding the cumulative long-term occupation of constrained rural road corridors by strategic electricity infrastructure, joint bays, utility crossings and associated permanent infrastructure, and the extent to which this **may sterilise sections of the local road network** and constrain future maintenance, drainage improvement, utility access, widening and upgrading works.

The Concern Group respectfully submits that insufficient assessment has been undertaken regarding the long-term implications of permanently embedding strategic high-voltage infrastructure within constrained local roads that were not originally designed to accommodate concentrated national utility infrastructure of this nature.

While the EIAR repeatedly characterises the proposed development as forming part of a “single, combined project”, the associated infrastructure has nonetheless been advanced through separate planning applications. The Concern Group respectfully submits that this creates significant difficulty in ensuring transparent cumulative assessment, coherent public participation and integrated planning evaluation of the wider Cashla Peaker Project.

The Concern Group further notes that portions of the affected local road network are also identified within the proposed Gannow Wind Farm infrastructure corridor (ACP Ref. 500493), including approximately 2.2km of shared road corridor along sections of the L7108. The Concern Group respectfully submits that insufficient consideration has been given to the cumulative long-term infrastructure, construction, traffic management and road occupation implications arising from the potential interaction of multiple strategic infrastructure projects within the same constrained rural road network.

The Concern Group further submits that the proposed substation, telecommunications mast and underground cable infrastructure are functionally and operationally linked to ACP Ref. 324113 and should therefore be assessed cumulatively as part of the wider integrated infrastructure project.

Particular concern also arises regarding the extent to which the proposed reliance upon statutory infrastructure powers, road-opening arrangements and long-term utility access requirements may contribute to progressive infrastructure intensification within the receiving environment beyond that presently assessed within the application documentation.

16.3 Road Subsoil, Adjoining Landowners and Property Interests

The Concern Group respectfully submits that insufficient clarity has been provided regarding the interaction between the proposed underground cable infrastructure, public road corridors, adjoining land ownership and any potential road subsoil interests arising within the receiving environment.

The proposed development would involve permanent installation of substantial underground electrical infrastructure within constrained local roads traversing established rural-residential communities and adjoining agricultural lands.

The Concern Group respectfully submits that insufficient information has been provided regarding:

- the long-term implications of permanent underground infrastructure occupation within the public road network;
- future access arrangements for infrastructure maintenance and repair;
- interaction between underground infrastructure and adjoining agricultural and residential lands;
- and the cumulative implications associated with repeated future infrastructure intervention affecting roads adjoining private property.

The application documentation further confirms that the proposed development would include multiple permanent underground concrete joint bay structures installed beneath sections of the affected local road network.

The Concern Group respectfully submits that insufficient information has been provided regarding the long-term operational, maintenance and land-use implications associated with these permanent underground structures within constrained rural roads adjoining residential and agricultural properties.

The Concern Group further submits that insufficient direct engagement appears to have taken place with many adjoining residents and landowners regarding the long-term operational, maintenance and access implications associated with permanent underground occupation of sections of the local road network.

The Concern Group further submits that insufficient information has been provided regarding any proposed future wayleave arrangements, compensation mechanisms, infrastructure access protocols or long-term engagement processes affecting adjoining landowners and residents along the proposed underground cable corridor.

Particular concern also arises regarding the extent to which future road maintenance, utility installation, drainage works or infrastructure upgrades may become increasingly constrained by the presence of permanent underground electrical infrastructure and associated joint bay installations.

Additional concern also arises regarding the extent to which permanent underground infrastructure occupation within constrained local roads may affect future flexibility for road widening, drainage improvement, active travel enhancement, utility diversion works and local infrastructure upgrading within the receiving environment.

The Concern Group acknowledges that strategic electricity infrastructure may involve statutory infrastructure functions and road-opening arrangements within the public road network. Nevertheless, residents and adjoining landowners within the receiving environment remain concerned regarding the practical long-term implications associated with permanent high-voltage underground infrastructure adjoining homes, farms, businesses and established rural communities, particularly within constrained local roads characterised by significant residential occupation and limited alternative access arrangements.

The Concern Group respectfully submits that insufficient consideration has been given to the long-term practical implications arising from the concentration of major strategic utility infrastructure within constrained local roads serving established residential and agricultural communities.

16.4 Procedural Clarity and Deferred Design Detail

The application documentation confirms that aspects of the final underground cable alignment, infrastructure separation distances and utility coordination arrangements remain subject to further assessment and detailed design development.

The Concern Group respectfully submits that unresolved and deferred design matters introduce significant uncertainty regarding:

- the final positioning of underground infrastructure;
- cumulative interaction with existing underground services;
- future infrastructure coordination requirements;
- the extent of future road occupation and maintenance activity;
- and the ultimate operational arrangement of the underground cable corridor.

The application documentation further confirms that sections of the proposed cable alignment may be modified following further assessment and detailed design work.

The Concern Group respectfully submits that where potentially material aspects of the final underground cable alignment and associated infrastructure arrangements remain unresolved, it is difficult for An Coimisiún Pleanála to fully assess:

- the likely long-term implications associated with the proposed development;
- the cumulative interaction between underground infrastructure systems;
- the future operational and maintenance implications affecting the receiving road network;
- and the compatibility of the proposed development with proper planning and sustainable development.

Particular concern also arises regarding the extent to which significant reliance is placed upon future road-opening licences, future utility coordination processes and future detailed engineering design in circumstances where the full long-term implications of the proposed infrastructure occupation remain uncertain at the current stage of assessment.

The Concern Group respectfully submits that greater procedural clarity and design certainty would be required in order to fully assess the likely long-term implications associated with the proposed underground cable corridor.

The Concern Group further submits that where material aspects of the final infrastructure arrangement remain subject to subsequent detailed design, utility coordination and road-opening processes, there is a risk that the full cumulative and long-term implications of the

proposed development may not be capable of meaningful assessment by the public or by An Coimisiún Pleanála at the current stage of determination.

16.5 Proportionality and Long-Term Infrastructure Burden

The Concern Group respectfully submits that insufficient consideration has been given to the proportionality of concentrating substantial strategic electricity infrastructure within constrained rural roads serving established residential and agricultural communities.

The proposed underground cable corridor traverses an established mixed rural-residential environment characterised by:

- ribbon development;
- residential occupation;
- agricultural activity;
- commuter-related traffic movement;
- school-related traffic;
- local business operations;
- and constrained local roads with limited alternative access arrangements.

The Concern Group respectfully submits that the affected local roads primarily serve residential, agricultural and community functions and are not historically characterised as strategic utility corridors intended for the long-term concentration of major underground transmission infrastructure.

Particular concern arises regarding:

- the cumulative long-term infrastructure burden imposed upon the receiving environment;
- repeated future infrastructure intervention and maintenance activity;
- cumulative underground utility congestion;
- future infrastructure reinforcement requirements;
- and the progressive transformation of local rural roads from community-serving infrastructure into strategic utility corridors.

The EIAR further confirms that the design and configuration of the proposed onsite substation evolved through consultation with EirGrid and was influenced by future grid reinforcement considerations, including future extension capability.

The Concern Group respectfully submits that the cumulative long-term occupation of constrained rural roads by strategic underground electrical infrastructure should also be assessed having regard to the evolving transport, mobility and settlement objectives identified within the Galway County Development Plan 2022–2028, the Athenry Local Area Plan and the Regional Spatial and Economic Strategy for the Northern and Western Region, including objectives relating to sustainable rural communities, active travel, infrastructure coordination and protection of residential amenity.

The Concern Group respectfully submits that this further demonstrates the extent to which the proposed development is intended to support long-term strategic transmission infrastructure objectives extending beyond the immediate operational requirements of the proposed development itself.

Insufficient consideration appears to have been given to:

- the proportionality of the long-term infrastructure burden imposed upon settled rural communities;
- the cumulative implications associated with repeated infrastructure intervention
- the long-term flexibility and resilience of the affected road network;
- and the extent to which future maintenance and reinforcement activity may affect residents, farms, businesses and road users over the operational lifespan of the proposed development.

The application documentation confirms that sections of the affected local road network may be subject to prolonged closure and traffic management arrangements over extended construction periods, including significant disruption affecting the L7108, L7109 and L3103 corridors. The Concern Group respectfully submits that the cumulative extent and duration of proposed road occupation further reinforces concern regarding the proportionality of concentrating major strategic electricity infrastructure within constrained rural roads serving established residential, agricultural and community functions.

The Concern Group further notes the relevance of the Galway County Development Plan 2022–2028, including policies relating to protection of residential amenity, sustainable rural communities and appropriate management of development impacts within evolving rural settlement areas.

Accordingly, the Concern Group respectfully submits that insufficient evidence has been provided demonstrating that the long-term infrastructure burden and cumulative corridor occupation associated with the proposed underground cable infrastructure are proportionate having regard to the established residential and agricultural character of the receiving environment.

16.6 Conclusion

The Concern Group respectfully submits that insufficient clarity has been provided regarding the long-term procedural, operational and proportionality implications associated with the proposed underground cable corridor and associated occupation of the public road network.

The application documentation confirms that aspects of the final cable alignment, infrastructure positioning and utility coordination arrangements remain unresolved and subject to further assessment and detailed design development.

The Concern Group respectfully submits that insufficient consideration has been given to:

- the cumulative long-term infrastructure burden imposed upon settled rural communities;
- future maintenance and intervention requirements;
- the proportionality of concentrating major underground transmission infrastructure within constrained rural roads;
- and the long-term implications associated with progressive corridor intensification within the receiving environment.

The Concern Group further submits that the proposed development may create long-term constraints affecting future road improvement, drainage upgrading, active travel enhancement and utility coordination within the receiving environment.

Accordingly, the Concern Group respectfully submits that An Coimisiún Pleanála should carefully consider the procedural certainty, proportionality and long-term implications associated with the proposed development in assessing its compatibility with proper planning and sustainable development.

17 Planning Policy, Development Plan Conflict and Sustainable Development

17.1 Introduction

The Concern Group respectfully submits that the proposed development must be assessed having regard to:

- the Galway County Development Plan 2022–2028;
- the National Planning Framework;
- the Regional Spatial and Economic Strategy for the Northern and Western Region;
- the evolving settlement, mobility and quality-of-life objectives affecting the wider Athenry area;
- climate and environmental obligations;
- the principles of proper planning and sustainable development;
- and the cumulative interaction between the proposed development and the wider Cashla Peaker Project (ACP Ref. 324113).

The proposed development comprises substantial strategic electrical infrastructure including a 220kV substation compound, underground cable corridor, telecommunications mast, lighting infrastructure and associated permanent infrastructure works within an established rural-residential receiving environment.

The Concern Group respectfully submits that the proposed development should be assessed cumulatively with ACP Ref. 324113, for which the proposed substation, mast and underground cable infrastructure are intended to provide enabling strategic grid infrastructure.

Particular concern arises regarding:

- cumulative infrastructure intensification;
- industrialisation of the rural environment;
- residential amenity impacts;
- landscape and visual effects;
- groundwater and environmental sensitivity;
- and the long-term strategic transformation of the receiving environment arising from the combined development.

Particular regard should also be had to the evolving rural-residential and commuter-related character of the wider Athenry area together with policy objectives relating to sustainable communities, active travel, environmental quality and protection of residential amenity.

The Concern Group respectfully submits that the proposed development gives rise to significant conflict with the objectives of the Galway County Development Plan 2022–2028 and has not been demonstrated to constitute proper planning and sustainable development.

17.2 Galway County Development Plan 2022–2028

The Galway County Development Plan 2022–2028 includes objectives relating to:

- protection of rural character;
- safeguarding of residential amenity;
- sustainable rural communities;
- protection of groundwater and environmental resources;
- appropriate management of infrastructure development;
- and the protection of visually sensitive rural landscapes.

The proposed development would introduce substantial permanent electrical infrastructure and prolonged construction activity into an established rural-residential environment characterised by:

- dispersed residential occupation;
- agricultural activity;
- constrained rural roads;
- groundwater-sensitive karst limestone geology;
- and evolving rural settlement patterns associated with the wider Galway fringe and Athenry commuter belt.

The Concern Group respectfully submits that the cumulative interaction between ACP Ref. 324113 and ACP Ref. 324162 would contribute to:

- progressive industrialisation of the rural landscape;
- increasing strategic infrastructure concentration;
- erosion of rural residential character;
- cumulative environmental and landscape effects;
- and long-term alteration of the receiving environment.

Particular concern arises regarding the extent to which the proposed development conflicts with Development Plan objectives relating to:

- protection of residential amenity;
- management of infrastructure development within the countryside;
- protection of rural landscape character;
- environmental protection and groundwater management;
- and sustainable rural development.

The Concern Group respectfully submits that insufficient consideration has been given within the EIAR to the cumulative impact of ongoing infrastructure intensification within the wider Athenry and Cashla area.

The Galway County Development Plan 2022–2028 also contains objectives relating to sustainable mobility, protection of community infrastructure, coordinated infrastructure delivery and the safeguarding of environmental quality within rural areas. The Concern Group respectfully submits that the cumulative occupation of constrained rural roads by strategic underground infrastructure may create additional long-term constraints affecting future road improvement, drainage enhancement, walking and cycling infrastructure and active travel connectivity within the receiving environment.

Particular concern also arises regarding the extent to which the permanent occupation of constrained rural roads by strategic underground electrical infrastructure, joint bays and associated utility crossings may sterilise sections of the local road network and constrain future Uisce Éireann water services upgrades, drainage improvement works, maintenance access and coordinated public infrastructure delivery within the wider receiving environment.

Accordingly, the Concern Group respectfully submits that the proposed development conflicts with a number of objectives of the Galway County Development Plan 2022–2028.

17.3 Climate Policy and National Planning Framework

The Concern Group respectfully submits that the proposed development is functionally and operationally linked to ACP Ref. 324113 and must therefore be assessed cumulatively as part of a wider fossil-fuel energy infrastructure project. Detailed climate matters are addressed separately within the Concern Group’s submission relating to ACP Ref. 324113 together with supporting climate documentation and expert correspondence appended to that submission.

The Concern Group respectfully submits that insufficient information has been provided regarding:

- the long-term climate implications of the wider integrated project;
- compliance with national decarbonisation objectives;
- the interaction between the proposed development and carbon reduction obligations;
- and the long-term strategic rationale for substantial new fossil-fuel-related infrastructure extending toward 2050.

Particular concern arises regarding the extent to which the proposed development would facilitate long-term fossil-fuel infrastructure dependency and associated strategic infrastructure lock-in contrary to national climate transition objectives.

The Concern Group respectfully submits that the cumulative interaction between ACP Ref. 324113 and ACP Ref. 324162 has not been adequately assessed having regard to national climate policy, emissions reduction obligations and the transition toward a low-carbon energy system.

The National Planning Framework and Regional Spatial and Economic Strategy emphasise compact growth, sustainable infrastructure planning, environmental protection and climate resilience. The Concern Group respectfully submits that insufficient consideration has been given to the extent to which cumulative infrastructure intensification within the receiving environment may conflict with these wider sustainability objectives.

17.4 Proper Planning and Sustainable Development

The Concern Group respectfully submits that the proposed development has not been demonstrated to constitute proper planning and sustainable development having regard to:

- the scale and permanence of the proposed infrastructure;
- the sensitivity of the receiving environment;
- the cumulative interaction between multiple infrastructure systems;
- the extent of residential and community impacts;
- the visual and landscape effects of the proposed development;
- the groundwater and environmental sensitivity of the receiving environment;
- and the cumulative impact of infrastructure intensification within the wider Athenry and Cashla area.

The proposed development would introduce substantial strategic electrical infrastructure into an established rural-residential environment characterised by agricultural activity, dispersed settlement patterns and significant environmental sensitivity.

The Concern Group respectfully submits that the proposed development repeatedly treats the receiving environment primarily as an infrastructure corridor while insufficiently recognising

- the established residential and agricultural function of the area;
- the cumulative burden imposed upon local communities;
- and the long-term implications of ongoing strategic infrastructure concentration within the countryside.

Particular concern arises regarding prolonged construction disruption, cumulative visual and landscape effects, long-term infrastructure concentration, groundwater and hydrological uncertainty and cumulative residential amenity impacts associated with the combined development.

The Concern Group respectfully submits that the proposed development may result in a potentially disproportionate concentration of strategic infrastructure within an established rural-residential receiving environment.

Accordingly, the Concern Group respectfully submits that the proposed development has not been demonstrated to satisfy the requirements of proper planning and sustainable development.

17.5 Development Plan Conflict and Planning Balance

The Concern Group respectfully submits that the proposed development, when assessed cumulatively with ACP Ref. 324113, gives rise to significant conflict with the Galway County Development Plan 2022–2028 and fails to achieve an appropriate planning balance.

Particular concern arises regarding:

- the cumulative industrialisation of the rural environment;
- the concentration of strategic infrastructure within settled rural communities;
- the cumulative landscape and visual effects of the combined development;
- the inadequacy of cumulative assessment within the EIAR;
- the extent of unresolved environmental uncertainty;
- and the long-term implications of permanent infrastructure intensification within the receiving environment.

The Concern Group respectfully submits that the cumulative impacts identified throughout this submission are not minor or temporary in nature and extend significantly beyond isolated construction effects.

The application documentation further confirms unresolved matters relating to final infrastructure design, utility interaction, groundwater and geological constraints and cumulative interaction with other infrastructure systems affecting the receiving environment.

The Concern Group respectfully submits that the EIAR materially underestimates the cumulative environmental, residential, infrastructural and landscape impacts arising from the wider integrated Cashla Peaker Project.

Accordingly, the Concern Group respectfully submits that the proposed development, when assessed cumulatively with ACP Ref. 324113, conflicts with a number of objectives of the Galway County Development Plan 2022–2028 and has not been demonstrated to constitute proper planning and sustainable development of the area.

The Concern Group further submits that insufficient evidence has been provided demonstrating meaningful and route-specific engagement with residents, agricultural operators, schools, local businesses and community stakeholders directly affected by the proposed underground cable corridor and associated infrastructure works, particularly having regard to the scale, duration and cumulative nature of the proposed infrastructure intervention within the receiving environment.

18 Economic Context and Gas Dependence

Recent analysis by the Economic and Social Research Institute (ESRI), including *A Descriptive Comparison of Irish and European Electricity Prices 2018–2024* and associated 2026 summary findings, identifies international gas price exposure as a significant driver of Irish electricity prices and electricity price volatility, including elevated residential electricity costs relative to other European states.

In parallel, Government policy under the Large Energy User Action Plan (LEAP) provides that energy system planning should assess a range of future development scenarios, including varying levels of gas-fired generation, storage deployment, interconnection and demand-side flexibility. This indicates that future reliance on gas-fired generation is not fixed, but depends upon modelling assumptions, technological development and strategic policy choices.

The Concern Group respectfully submits that, when assessed with ACP Ref. 324113, the proposed development may contribute to continued strategic reliance upon gas-related

electricity infrastructure without adequately demonstrating that lower-carbon alternative infrastructure approaches have been fully assessed.

This is particularly relevant having regard to:

- ongoing electricity affordability concerns;
- exposure of domestic consumers to volatile international gas prices;
- evolving national decarbonisation obligations;
- and the requirement under Article 5 of the EIA Directive for the applicant to outline reasonable alternatives studied and the main reasons for the option chosen, taking into account the environmental effects of the project.

Insufficient information has been provided demonstrating that alternative system pathways, including lower-carbon infrastructure approaches, storage deployment, demand-side flexibility and wider grid alternatives, were adequately assessed prior to selection of the proposed development.

Accordingly, significant uncertainty remains regarding whether the proposed development represents the most sustainable long-term infrastructure approach having regard to national climate transition policy and evolving electricity system requirements.

The Regional Spatial and Economic Strategy for the Northern and Western Region supports transition toward a low-carbon regional economy, coordinated infrastructure planning and sustainable development consistent with national climate objectives. The Concern Group respectfully submits that insufficient evidence has been provided demonstrating that the proposed development represents the most sustainable or climate-consistent infrastructure solution within the wider regional context.

The extent of community concern regarding the wider Cashla Peaker Project further reinforces the importance of ensuring that all reasonable alternatives and long-term infrastructure implications have been fully assessed.

The Concern Group respectfully submits that this level of sustained public concern is relevant to the overall planning balance, particularly having regard to the long-term infrastructural, environmental and social implications associated with the proposed development.

19 Independent Statutory and Expert Concerns Raised in ACP-324113

19.1 Introduction

The Concern Group respectfully notes that a number of independent statutory consultees, public authorities and third-party organisations have also identified material concerns and unresolved issues arising from the wider integrated Cashla Peaker Project under ACP Case Reference 324113.

While these submissions address differing aspects of the overall development, they collectively reinforce concerns relating to cumulative assessment, infrastructure interaction, road safety, environmental assessment scope, climate policy compliance, flood risk, hydrogeological sensitivity and the long-term environmental effects associated with the wider integrated project.

The Concern Group respectfully submits that these independent observations further support the position that the proposed development gives rise to environmental, infrastructural and community effects extending materially beyond those assessed within either consent application considered independently and reinforce the need for robust cumulative assessment of the wider integrated Cashla Peaker Project within the receiving environment.

19.2 Galway County Council

Galway County Council identified significant concerns regarding road safety, traffic assessment, underground grid infrastructure, hydrogeological sensitivity, flood risk, lighting assessment and cumulative infrastructure interaction associated with the wider Cashla Peaker Project.

Galway County Council further identified concerns regarding deficiencies in road safety auditing, traffic and transport assessment, sightline assessment and the absence of adequate glare and lux contouring analysis associated with the proposed lighting infrastructure.

In particular, Galway County Council stated:

“The scale of the unit, combined with the associated infrastructure, would effectively sterilise the public roadway.”

The Council further identified that this would:

“prevent Galway County Council from carrying out essential future works, including drainage upgrades, installation or extension of Group Water Scheme mains, and the provision or alteration of house service connections.”

Galway County Council additionally identified concerns regarding:

- the absence of a detailed Traffic and Transport Assessment;
- indirect adverse impacts on road safety;
- motorway lighting impacts including glare and overspill;
- structural interaction associated with HDD works in proximity to motorway bridges;
- abnormal load transportation and bridge loading;
- and the cumulative occupation of constrained rural roads by strategic utility infrastructure.

The Council also identified that the subject site is underlain by a regionally important aquifer with:

“potential for Karst formations at the site”

and further identified that part of the development is connected to:

“the Galway Bay Groundwater Dependent Terrestrial Ecosystem (GWDTE), which is connected to a Special Area of Conservation (SAC).”

Galway County Council further acknowledged that potential hydrogeological pathways exist between the proposed development and European sites including the Galway Bay Complex SAC, Inner Galway Bay SPA and Cregganna Marsh SPA.

The Concern Group respectfully submits that these independent observations materially reinforce concerns regarding cumulative infrastructure interaction, long-term sterilisation of constrained rural roads, groundwater vulnerability, karst uncertainty, ecological connectivity, road safety, lighting assessment deficiencies and the adequacy of the environmental assessment associated with the wider integrated Cashla Peaker Project.

19.3 An Taisce

An Taisce identified significant concerns regarding climate policy compliance, cumulative greenhouse gas emissions, fossil fuel lock-in, groundwater vulnerability, hydrological uncertainty, alternatives assessment and compliance with the Habitats Directive and Water Framework Directive associated with the wider Cashla Peaker Project.

An Taisce further identified concerns regarding the proposed operational lifespan of the development extending toward 2050 and stated that such continued gas-fired generation was:

“considered to be inappropriate and in contravention of Ireland’s legally-binding decarbonisation obligations.”

In particular, An Taisce identified concerns regarding:

- the absence of operational greenhouse gas mitigation measures;
- the adequacy of cumulative national assessment relating to existing, permitted and proposed gas-fired generation infrastructure;
- the absence of meaningful consideration of lower-emission or zero-emission alternatives including long-duration energy storage;
- the long-term risk of fossil fuel lock-in and stranded infrastructure assets;
- and the compatibility of continued gas-fired generation with increasingly stringent carbon budgets and sectoral emissions ceilings.

An Taisce additionally identified concerns regarding groundwater vulnerability, karst conditions and hydrogeological uncertainty associated with the Galway Bay Complex groundwater-dependent systems. In particular, the submission noted:

“The groundwater vulnerability to contamination under the site of the Proposed Project is classified as a combination of ‘Extreme’ and ‘Rock at or near surface or karst’”

and further stated:

“the GWDTE-Galway Bay Complex Fens ground waterbody is poorly documented, and it is unclear how ground water travels within this waterbody.”

An Taisce further emphasised the requirement for robust compliance with Article 4 of the Water Framework Directive and Article 6(3) of the Habitats Directive and identified the legal requirement to refuse authorisation where a proposal may:

- cause deterioration in the status of a waterbody;
- jeopardise the attainment of good water status objectives;
- or adversely affect the integrity of European sites.

The submission further stated:

“authorisation for a plan or project may therefore be given only on condition that the competent authorities are certain that the plan or project will not have lasting adverse effects on the integrity of the site.”

and further emphasised that Appropriate Assessment conclusions must contain:

“complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt”

The Concern Group respectfully submits that these independent observations materially reinforce concerns regarding cumulative greenhouse gas assessment, climate policy compliance, groundwater vulnerability, karst uncertainty, hydrological connectivity, alternatives assessment and compliance with the Habitats Directive and Water Framework Directive associated with the wider integrated Cashla Peaker Project.

19.4 Transport Infrastructure Ireland (TII)

Transport Infrastructure Ireland identified significant concerns regarding abnormal load transportation, bridge loading, motorway crossings, underground grid infrastructure, HDD works, lighting impacts and the protection of the strategic national road network associated with the wider Cashla Peaker Project.

TII further identified concerns regarding the transportation of Exceptional Abnormal Loads associated with the proposed development and stated that the development would involve:

“Exceptional Abnormal Loads”

including:

- a 360-tonne gas turbine;
- a 380-tonne generator;
- and a 288-tonne transformer.

TII additionally stated that:

“the actual loading on associated road structures will be significantly greater than that detailed in the application.”

The submission further identified concerns regarding:

- bridge and culvert structural assessment;
- abnormal load routing;
- motorway HDD crossings;
- interaction with motorway drainage infrastructure;
- and the requirement for pre- and post-construction structural surveys and road condition assessment.

TII additionally identified concerns regarding cumulative interaction between the proposed development and the concurrent Gannow Windfarm grid connection proposals affecting the same constrained local roads and motorway crossings. In particular, TII noted that:

“both appear to seek to utilise the same sections of local road in some instances.”

and further identified that:

“Opportunities to optimise grid routing to minimise impact to the strategic national road network may be available”

through greater co-ordination of infrastructure delivery.

TII also identified concerns regarding external lighting impacts on motorway users and stated that lighting must ensure:

“no incidence of glare, overspill or potential distraction to road users on the adjoining motorway network.”

The Concern Group respectfully submits that these independent observations materially reinforce concerns regarding road safety, motorway infrastructure interaction, cumulative corridor occupation, abnormal load transportation, bridge and culvert assessment, HDD crossing impacts, lighting impacts and the adequacy of assessment associated with the wider integrated Cashla Peaker Project.

19.5 Office of Public Works (OPW)

The Office of Public Works identified significant concerns regarding flood risk assessment, hydrological assessment, watercourse crossings, bridge and culvert interaction and infrastructure impacts associated with the wider Cashla Peaker Project.

The OPW further identified that any new culverts, bridges or modifications to existing bridge and culvert structures associated with the proposed development may require consent under Section 50 of the Arterial Drainage Act 1945.

In particular, the OPW identified concerns regarding:

- grid connection crossings of watercourses;
- bridge and culvert modification associated with cable ducting;
- potential interaction with motorway and local drainage infrastructure;
- and the adequacy of flood risk assessment associated with the proposed development and its construction.

The OPW further recommended that:

“a flood risk assessment be carried out with regard to the proposed development and its construction.”

The submission additionally stated that the assessment should consider:

“all sources, pathways and receptors of flood risk including nearby drainage district channels.”

The OPW further identified that flood risk associated with the proposed development could impact:

“Landscape (e.g. landslides that have been reported in recent years), Infrastructure (roads and bridges) and people and their homes”

The submission additionally identified concerns regarding reliance upon the absence of mapped flood data within the applicant’s documentation and stated:

“Since there are no available flood maps, based on the map viewer, there is no flooding indicated at the proposed site” cannot be taken as factual”

The OPW further concluded that:

“a thorough and rigorous local flood risk analysis should be carried out at the site in question in relation to the proposed *development*”

The Concern Group respectfully submits that these independent observations materially reinforce concerns regarding flood risk assessment adequacy, hydrological uncertainty, bridge and culvert interaction, watercourse crossing impacts, drainage infrastructure interaction and the adequacy of environmental assessment associated with the wider integrated Cashla Peaker Project.

19.6 Department of Housing, Local Government and Heritage

The Department of Housing, Local Government and Heritage identified significant concerns regarding ecological assessment, hydrological connectivity, ornithological survey scope, bat assessment methodology, lighting impacts and compliance with Article 6(3) of the Habitats Directive in relation to the wider Cashla Peaker Project.

The Department expressly stated:

“On the basis of the information provided, it cannot be concluded, beyond reasonable scientific doubt, that the proposed development will not adversely affect the integrity of European sites, either alone or in combination with other plans and projects.”

The Department further noted that, while principal impact pathways were identified within the Natura Impact Statement, ***“the level of analysis provided is not sufficient in all cases to allow for a definitive conclusion to be reached.”***

In particular, the Department identified deficiencies regarding:

- hydrological connectivity assessment and drainage pathway analysis;
- ornithological baseline survey scope and restricted Zone of Influence;
- the absence of adequately integrated disturbance assessment;
- limited bat survey duration and absence of multi-season survey coverage;
- the absence of detailed bat roost assessment;
- and the absence of a bat-specific lighting impact assessment notwithstanding the scale of the proposed permanent lighting infrastructure.

The bat survey consists only of thirteen consecutive nights in June, providing summer activity data only, with no spring or autumn surveys introducing ***“uncertainty regarding commuting, dispersal, and swarming behaviour.”*** Multiple light-sensitive bat species were identified actively foraging within the site, with treeline habitat showing higher activity levels and potential roosting, yet no detailed roost assessment was undertaken. The Department identifies that the proposed development includes extensive permanent lighting infrastructure with luminaires at 8-20 metres height achieving 10 lux average illuminance. The critical finding:

"Artificial lighting is not assessed within the bat report, notwithstanding the scale of proposed lighting infrastructure. The absence of a bat-specific lighting impact assessment represents a significant deficiency, particularly given the known sensitivity of certain bat species to illumination." Mitigation measures are **"limited in scope and lack specificity,"** with no clear strategy for habitat retention or lighting impact mitigation. ***"On this basis, the assessment does not provide sufficient information to support a conclusion of no adverse effect on bat species."***

The Department additionally stated that mitigation measures relied upon within the Natura Impact Statement must be ***"precise, certain, and capable of implementation"*** and identified concerns that the proposed mitigation measures lacked sufficient specificity and relied excessively on generalised best-practice assumptions.

The Department concluded that further information was required to address the identified deficiencies and that, pending submission and assessment of such information, it was not possible to conclude that the proposed development would not adversely affect the integrity of European sites.

The ecological sensitivity of the wider receiving environment is further reflected within Appendix F, which identifies extensive protected species records and ecological connectivity corridors within the wider Rathmorrissy area.

The Concern Group respectfully submits that these independent observations from the State's statutory heritage and nature conservation authority materially reinforce concerns regarding ecological baseline deficiencies, incomplete impact assessment, hydrological uncertainty, lighting impacts on protected species, restricted assessment scope, deferred mitigation and compliance with Article 6 of the Habitats Directive.

19.7 Conclusion

The Concern Group respectfully submits that the observations raised independently by Galway County Council, An Taisce, Transport Infrastructure Ireland, the Office of Public Works and the Department of Housing, Local Government and Heritage collectively reinforce the existence of significant unresolved issues relating to cumulative assessment, ecological assessment adequacy, hydrological connectivity, road and bridge infrastructure interaction, climate policy compliance, flood risk, groundwater sensitivity, lighting impacts and the integrated nature of the wider Cashla Peaker Project.

Galway County Council identified concerns that elements of the proposed infrastructure would ***"effectively sterilise the public roadway"*** and restrict the future ability of the local authority to undertake drainage upgrades, utility works and associated road infrastructure interventions within the affected road network.

An Taisce identified concerns regarding cumulative gas infrastructure assessment, hydrogeological uncertainty associated with the Galway Bay Complex and compliance with the Water Framework Directive and Article 6 of the Habitats Directive.

Transport Infrastructure Ireland identified concerns regarding the integrity and safety of the surrounding road network, abnormal load transportation, motorway interaction and glare impacts affecting motorway users.

The Office of Public Works identified deficiencies in flood risk assessment and emphasised the requirement for a thorough and rigorous local flood risk analysis.

The Department of Housing, Local Government and Heritage further concluded that, on the basis of the information provided, it could not be concluded, beyond reasonable scientific doubt, that the proposed development would not adversely affect the integrity of European sites, either alone or in combination with other plans and projects.

The Concern Group respectfully submits that these independent observations materially reinforce concerns regarding incomplete baseline assessment, deferred mitigation, restricted survey scope, cumulative infrastructure interaction, hydrological uncertainty and the adequacy of the Natura Impact Statement and EIAR associated with the wider integrated Cashla Peaker Project.

The consistent identification of concerns by multiple independent statutory and expert bodies further demonstrates that significant uncertainty remains regarding the likely significant environmental effects, long-term infrastructural implications and cumulative impacts associated with the proposed development and its associated infrastructure.

In these circumstances, the Concern Group respectfully submits that An Coimisiún Pleanála cannot reasonably conclude, on the basis of the information presently before it, that the likely significant environmental effects of the proposed development and its associated infrastructure have been identified, described and assessed in a complete, precise and definitive manner consistent with the requirements of the EIA Directive, Article 6 of the Habitats Directive, the Planning and Development Act 2000 (as amended) and the precautionary principle.

20 Conclusion

20.1 Overall Conclusion

This submission has assessed the proposed Cashla Peaker Plant development having regard to:

- the Environmental Impact Assessment Report (EIAR);

- the receiving environment;
- national, regional and local planning policy;
- climate law and environmental obligations;
- and community engagement and participation.

The Concern Group further submits that the proposed development should be assessed cumulatively with ACP Ref. 324162 having regard to the clear operational, functional and infrastructural relationship between the proposed generating station, substation, telecommunications mast and associated grid connection infrastructure.

It is respectfully submitted that the EIAR does not provide a complete, robust or sufficiently reliable assessment of the likely significant effects of the proposed development or the cumulative impacts arising from the wider integrated Cashla Peaker Project.

The Concern Group respectfully submits that the proposed development forms part of a wider integrated strategic energy infrastructure project comprising the proposed generating station, associated gas infrastructure, substation infrastructure, telecommunications infrastructure and underground grid connection works. The cumulative environmental, infrastructural, residential and landscape implications of the combined development have not been adequately assessed within the application documentation.

The concerns identified throughout this submission are also inconsistent with the wider objectives of sustainable settlement growth, environmental quality and community wellbeing identified within the Athenry Town Centre First Plan (Appendix D).

The independent LVIA Peer Review contained within Appendix A further supports the conclusion that the landscape and visual effects of the proposed development may be materially underestimated within the EIAR.

20.2 Key Findings

The assessment undertaken throughout this submission identifies a number of significant issues regarding the proposed development, the adequacy of the EIAR and the wider cumulative impacts associated with the integrated Cashla Peaker Project.

20.2.1 (a) Incomplete and Deficient EIAR

The EIAR:

- fails to adequately assess cumulative, indirect and in-combination effects;
- relies on limited or uncertain baseline data in key areas;
- does not fully assess interactions between environmental factors;
- omits or insufficiently addresses relevant issues, including aviation safety and long-term operational impacts;
- fails to adequately assess the cumulative interaction between ACP Ref. 324113 and ACP Ref. 324162;
- and repeatedly relies upon deferred design detail and evolving construction methodology assumptions.

As a result, the Concern Group respectfully submits that the EIAR raises significant concerns regarding compliance with the requirements of the Environmental Impact Assessment Directive and does not provide a sufficiently robust basis upon which the competent authority may reach a reasoned conclusion regarding the likely significant environmental effects of the proposed development.

The Concern Group respectfully submits that the segmentation of the wider Cashla Peaker Project into separate applications has materially limited the cumulative assessment of environmental, infrastructural, residential, hydrological, landscape and community impacts arising from the combined development.

The application documentation further confirms unresolved utility coordination matters, evolving infrastructure design requirements and uncertainty regarding aspects of the final cable alignment, infrastructure interaction and construction methodology. These unresolved matters materially undermine confidence in the reliability and completeness of the assessment process.

20.2.2 (b) Lack of Demonstrated Need and Justification

The EIAR does not demonstrate a clear or necessary link between projected future electricity demand and the specific development proposed.

In particular:

- insufficient information has been provided regarding projected demand and strategic necessity.;
- the role of the development within national energy strategy remains unclear;
- alternative technologies and solutions have not been fully assessed;
- and no adequate justification has been provided for the scale and extent of the proposed infrastructure.

The proposed substation, mast and underground cable infrastructure are functionally and operationally linked to the proposed generating station.

It has therefore not been established that the proposed development represents the most appropriate, proportionate or necessary response to future energy requirements.

The Concern Group respectfully submits that the proposed development therefore forms part of a wider integrated fossil-fuel infrastructure project requiring cumulative assessment of strategic necessity, long-term infrastructure dependency and climate compatibility.

20.2.3 (c) Conflict with Climate Policy and Law

The proposed development would facilitate continued fossil-fuel infrastructure use extending toward 2050.

The proposed grid infrastructure would facilitate continued operation of fossil-fuel electricity generation infrastructure over the operational lifetime of the wider Cashla Peaker Project.

Detailed climate, emissions and energy policy concerns arising from the wider Cashla Peaker Project are addressed separately within submissions relating to ACP Ref. 324113, including expert climate observations and correspondence submitted on behalf of the Concern Group. The proposed development must nevertheless be assessed cumulatively as enabling infrastructure for the wider fossil-fuel generating station proposal.

20.2.4 (d) Incompatibility with the Receiving Environment

The proposed development introduces large-scale industrial and electrical infrastructure into a rural environment characterised by:

- dispersed residential settlement;
- agricultural land use;
- groundwater and environmental sensitivity;
- constrained rural roads;
- and established rural landscape character.

This represents a substantial land-use change and gives rise to impacts on:

- residential amenity;
- landscape character;

- environmental quality;
- rural visual character;
- and cumulative infrastructure concentration and progressive infrastructural and visual intensification of the rural environment.

The Concern Group respectfully submits that insufficient regard has been given to the sensitivity of the receiving environment, the established rural-residential character of the surrounding townlands and the cumulative effect of ongoing infrastructure intensification throughout the wider Athenry and Cashla area.

20.2.5 (e) Internal Inconsistencies and Uncertainty

There are material inconsistencies within the EIAR, including:

- acknowledgement of environmental sensitivity alongside conclusions of no significant impact;
- reliance on mitigation to resolve fundamental conflicts;
- uncertainty arising from limited or constrained survey conditions;
- unresolved interaction between generating infrastructure and associated grid connection infrastructure;
- and evolving infrastructure design and utility coordination requirements.

These issues materially undermine confidence in the reliability and robustness of the assessment process.

The application documentation repeatedly acknowledges uncertainty regarding aspects of the final infrastructure configuration, groundwater interaction, traffic management arrangements and construction methodology while simultaneously concluding that likely impacts would be temporary or negligible.

The Concern Group respectfully submits that these inconsistencies and unresolved matters materially weaken the evidential basis of the EIAR and materially limit the ability of the competent authority to reach a reliable and legally robust conclusion regarding likely significant environmental effects.

20.3 Overall Planning Assessment

Having regard to the deficiencies identified in the EIAR, the absence of a clear and robust justification for the development, the conflict with climate policy and legal obligations, the incompatibility with the receiving rural environment, the cumulative infrastructure

implications of the wider Cashla Peaker Project and the scale and consistency of community concern, it has not been demonstrated that the proposed development would not give rise to significant adverse environmental effects. In circumstances where acknowledged environmental sensitivity, unresolved infrastructure coordination matters and material assessment uncertainty remain present, the Concern Group respectfully submits that a precautionary approach to assessment is warranted.

The cumulative environmental, infrastructural, residential and landscape impacts arising from the combined operation of ACP Ref. 324113 and ACP Ref. 324162 appear to be materially underestimated throughout the application documentation.

Nor has it been demonstrated that the proposed development is consistent with the requirements of proper planning and sustainable development.

The Concern Group respectfully submits that the proposed development forms part of a wider integrated strategic infrastructure project and should not be assessed independently of the associated generating station and related infrastructure.

The failure to adequately assess identified receptors including nearby residential properties, agricultural landholdings, local businesses, school-related traffic movements associated with Lisheenkyle National School, emergency access arrangements, agricultural servicing requirements and wider community receptors within the receiving environment further demonstrates that the EIAR is incomplete and does not provide a sufficiently reliable basis for assessment.

The proposed development is further inconsistent with the wider objectives of the Regional Spatial and Economic Strategy for the Northern and Western Region relating to sustainable settlement, environmental quality, coordinated infrastructure planning and transition toward a low-carbon regional economy.

In these circumstances and having regard to the deficiencies and uncertainties identified throughout this submission, significant uncertainty remains as to whether An Coimisiún Pleanála can reach a reasoned conclusion that the proposed development would not give rise to significant adverse effects. Accordingly, the Concern Group respectfully submits that permission should be refused.

For the communities living throughout Athenry, Cashla and the surrounding townlands, the proposed development represents a substantial and long-term alteration of the receiving environment, with potential consequences for residential amenity, environmental quality, landscape character and quality of life extending over decades. In circumstances where such impacts have not been fully or reliably assessed, the precautionary principle should apply.

While the EIAR identifies engagement with statutory bodies and technical consultees, insufficient evidence has been provided demonstrating comprehensive and proportionate

engagement with the wider affected rural-residential community throughout the route corridor and surrounding receiving environment.

20.4 Conclusion

In the absence of a complete and robust environmental assessment, sufficient information to assess climate and emissions impacts, a clear demonstration of need and justification, effective public participation and a sufficiently reliable cumulative assessment of the wider integrated Cashla Peaker Project. We believe ACP cannot be satisfied on the basis of the information presently before it that the proposed development complies with:

- the Environmental Impact Assessment Directive;
- the Climate Action and Low Carbon Development Act 2015;
- the Galway County Development Plan 2022–2028;
- the principles of proper planning and sustainable development;
- or Ireland’s wider environmental and climate obligations.

The competent authority should therefore assess the proposed development cumulatively with ACP Ref. 324162 and the wider Cashla Peaker Project infrastructure.

The Concern Group respectfully submits that the proposed development is inconsistent with multiple objectives of the Galway County Development Plan 2022–2028 relating to:

- protection of rural residential amenity;
- sustainable rural communities;
- landscape and visual protection;
- traffic safety and community accessibility;
- environmental protection;
- and proper planning and sustainable development.

The Concern Group respectfully submits that the cumulative environmental, infrastructural, residential, hydrological, landscape and community impacts arising from the combined project have been materially underestimated within the application documentation.

Particular concern also arises regarding the prolonged duration of proposed road occupation, trenching works and phased closures affecting constrained sections of the local road network over an extended construction programme.

The Concern Group respectfully submits that the proposed grid infrastructure cannot be separated from the wider climate and energy policy implications associated with ACP Ref. 324113, which are addressed in detail within related submissions before the Board.

The Concern Group further respectfully submits that the concerns identified independently by Galway County Council, An Taisce, Transport Infrastructure Ireland and the Office of Public Works materially reinforce the existence of unresolved issues relating to cumulative assessment, climate policy compliance, groundwater sensitivity, road infrastructure interaction, flood risk, lighting impacts and the long-term environmental effects associated with the wider integrated Cashla Peaker Project. The existence of consistent concerns across multiple independent statutory and expert bodies further demonstrates that significant uncertainty remains regarding the adequacy and completeness of the environmental assessment undertaken.

Accordingly, having regard to the deficiencies identified within the EIAR, the unresolved cumulative impacts associated with the wider integrated Cashla Peaker Project, including ACP Ref. 324113 and ACP Ref. 324162, the acknowledged environmental sensitivity of the receiving environment, the scale of the proposed infrastructure intervention, and the material uncertainty remaining regarding likely significant environmental effects and cumulative infrastructure interaction, the Concern Group respectfully submits that An Coimisiún Pleanála cannot presently be satisfied that the proposed development is consistent with the proper planning and sustainable development of the area. In these circumstances, and applying the precautionary principle, permission should therefore be refused.

APPENDICES

Appendix A – Landscape and Visual Impact Assessment (LVIA) – Independent Peer Review

Landscape and Visual Impact Assessment (LVIA) – Independent Peer Review

Proposed Cashla Peaker Power Plant, Co. Galway

Prepared on behalf of Athenry Peaker Plant Concern Group

Date: 29 March 2026

A1. Introduction

This appendix contains an independent peer review of the Landscape and Visual Impact Assessment (LVIA) submitted as part of the Environmental Impact Assessment Report (EIAR) for the proposed Cashla Peaker Plant development.

The purpose of this review is to assess the methodology, visualisations and conclusions presented within the LVIA and to identify areas where the assessment may not fully represent the likely landscape and visual effects of the proposed development.

This review should be read in conjunction with Section 4.7 of this submission, which summarises the key findings and planning implications arising from this technical assessment.

A2. Scope of Review

The LVIA peer review examines:

- The methodology adopted in the assessment
- The use and interpretation of Zone of Theoretical Visibility (ZTV) mapping
- The role of vegetation in screening the development
- The visual assessment and photomontages
- The treatment of mitigation planting
- The assessment of lighting and night-time effects
- The consideration of cumulative landscape and visual impacts

- The alignment of the assessment with relevant planning policy
-

A3. Key Findings (Summary)

The review identifies a number of key issues which are directly relevant to the assessment of landscape and visual impact:

- Over-reliance on vegetation screening assumptions which may not reflect actual conditions
- Underestimation of visibility due to reliance on vegetation-filtered ZTV rather than bare-earth ZTV
- Insufficient emphasis on worst-case (unmitigated) scenarios, particularly in early operational years
- Photomontages that may underrepresent the visual prominence of the development
- Absence of a detailed assessment of lighting and night-time visual effects
- Limited consideration of cumulative landscape and visual impacts
- Underestimation of the overall extent and significance of visual effects

These issues indicate that the conclusions of the LVIA may not fully represent the likely landscape and visual impacts of the proposed development.

A4. Relevance to Planning Assessment

The findings of this peer review are directly relevant to the determination of the application. In particular, they indicate that:

- The extent of visibility of the proposed development may be greater than presented
- Visual impacts may be more significant in early operational years prior to the establishment of mitigation planting
- Lighting may increase the perceived prominence of the development, particularly during night-time
- The cumulative impact of the development within a rural landscape may be underestimated

These issues raise concerns regarding compliance with the Galway County Development Plan, which seeks to protect landscape character and visual amenity and to ensure that development is appropriately integrated into its surroundings.

A5. Full LVIA Peer Review Document

The full Landscape and Visual Impact Assessment Peer Review is included below

Landscape and Visual Commentary / Peer Review

Proposed Cashla Peaker Power Plant, Co. Galway

(Prepared on behalf of Peaker Plant Concern Group)

29/03/2026

INTRODUCTION

1.1. This report provides an independent review of the Landscape and Visual Impact Assessment (LVIA) prepared by Eamonn Byrne Landscape Architects on behalf of the Applicant in support of the proposed Cashla Peaker Power Plant development.

1.2. The LVIA is presented within Volume 3 of the EIAR (Appendix 6.1) and assesses the potential landscape and visual effects of the Proposed Development within the defined study area. The assessment is supported by Zone of Theoretical Visibility (ZTV) mapping (including both bare earth and vegetation-filtered scenarios) and a series of verified photomontages prepared from a network of representative viewpoints across the study area.

1.3. The LVIA considers views from a range of receptor types, including local residents, road users and the wider rural landscape, and presents visualisations illustrating the Proposed Development at both Year 1 and Year 15 following the establishment of mitigation planting.

1.4. The LVIA concludes that the Proposed Development will give rise to localised moderate adverse visual effects, primarily affecting receptors in close proximity to the site, with effects reducing to minor or negligible at greater distances due to intervening vegetation, built form and landform.

1.5. This review considers the methodology, visualisations, and conclusions presented within the LVIA, with particular regard to:

The Zone of Theoretical Visibility (ZTV) analysis, including the distinction between bare-earth and vegetation-filtered scenarios;

The role of existing and proposed vegetation in screening the development;

The assessment of visual effects and the reliance on mitigation planting;

The consideration of lighting and night-time effects; and

The cumulative landscape context

1.6. The purpose of this review is to identify areas where the LVIA may not fully represent the likely landscape and visual effects of the Proposed Development.

REVIEW of LVIA Methodology

2.1. The LVIA adopts a methodology broadly consistent with established guidance, including the principles set out in GLVIA3, and applies a structured approach to the assessment of landscape and visual effects. This includes the use of ZTV analysis, viewpoint-based assessment, and the preparation of photomontages to illustrate the likely appearance of the Proposed Development.

2.2. Notwithstanding this, a number of aspects of the methodology, and its application within the assessment, warrant further consideration.

Use of ZTV Analysis

2.3. The LVIA presents both a bare-earth ZTV and a vegetation-filtered ZTV, which is considered good practice in principle. However, it is noted that the vegetation-filtered ZTV incorporates assumed screening effects from hedgerows, woodland and built form, including:

Woodland heights of approximately 12m;

Unmanaged hedgerows of approximately 5m; and

Managed hedgerows of approximately 2m.

While these assumptions are clearly stated, their application introduces a level of uncertainty. Vegetation within the study area is variable in height, density and continuity, and is often subject to active management. As such, the level of screening assumed within the vegetation filtered ZTV may not be consistently representative of actual on-site conditions.

In this context, the bare-earth ZTV provides a more robust indication of the maximum potential extent of visibility, particularly during winter months or in locations where vegetation is limited or discontinuous

Role of Vegetation in the Assessment

A consistent feature of the LVIA is the reliance on vegetation - both existing and proposed - to reduce the perceived visibility of the Proposed Development.

However, the distinction between Existing baseline vegetation, and Proposed mitigation planting is not always clearly defined within the assessment narrative.

This distinction is important, as existing vegetation forms part of the baseline condition, whereas proposed planting represents a mitigation measure that will take time to establish and may not achieve the level of screening assumed.

The reliance on vegetation within both the ZTV modelling and the visual assessment therefore introduces a degree of uncertainty in the predicted level of effect.

Assessment of Mitigated vs Worst-Case Scenarios

The LVIA presents visualisations at both Year 1 and Year 15, reflecting the anticipated establishment of mitigation planting over time.

While this is appropriate, it is noted that:

The assessment appears to place greater weight on mitigated scenarios, particularly those reflecting more mature vegetation cover;

The potential for greater visibility during the early operational years is less clearly emphasised within the conclusions.

2.12. Best practice would typically require clear distinction between:

Worst-case (unmitigated or minimally mitigated) scenarios, and

Residual (post-mitigation) effects.

2.13. In this context, the reliance on assumed vegetation screening and mitigated scenarios is a key consideration, particularly in informing the interpretation of visibility and visual effects, as discussed further in the following section.

ZTV and Visibility Analysis

3.1. The LVIA includes a Zone of Theoretical Visibility (ZTV) analysis to inform the extent of potential visibility of the Proposed Development across the study area. Two ZTV scenarios are presented:

A bare-earth ZTV, which excludes the screening effects of vegetation and buildings; and

A vegetation-filtered ZTV, which incorporates assumed screening from hedgerows, woodland and built form.

The inclusion of both scenarios is appropriate and reflects good practice. However, a comparison of the two ZTVs highlights a notable variation in the extent of predicted visibility.

The bare-earth ZTV indicates a substantially wider extent of theoretical visibility, extending across a broad area of the surrounding rural landscape and including areas in proximity to Athenry. In contrast, the vegetation-filtered ZTV presents a more contained and fragmented pattern of visibility, reflecting the assumed influence of screening elements.

While it is acknowledged that vegetation and built form will influence actual visibility on the ground, the extent to which the vegetation-filtered ZTV reduces visibility is dependent on the accuracy of the underlying assumptions. As outlined in Section 2, these include hedgerow and woodland heights that may not be consistently representative of prevailing conditions within the study area.

In particular:

Hedgerows are assumed to provide continuous screening at heights of up to 5m;

Woodland blocks are assumed to provide uniform screening at heights of approximately 12m; and

The combined effect of vegetation is treated as a consistent visual barrier across the landscape.

In practice, vegetation within the receiving landscape is variable in height, density and continuity, and is subject to seasonal change and active management. As such, the level of screening illustrated within the vegetation-filtered ZTV may not be realised across all areas.

In this context, the bare-earth ZTV provides an important indication of the maximum potential extent of visibility, particularly:

During winter months when vegetation cover is reduced;

In locations where hedgerows are intermittent or actively managed; and

Prior to the establishment of proposed mitigation planting.

It is also noted that the conclusions of the LVIA appear to align more closely with the vegetation-filtered ZTV, with limited emphasis placed on the wider extent of visibility indicated by the bare-earth scenario.

This has the potential to underrepresent the overall extent of visibility of the Proposed Development, particularly in the early operational phase and in areas with limited existing screening.

Overall, while the ZTV analysis is comprehensive in its presentation, greater emphasis on the implications of the bare-earth scenario would provide a more balanced understanding of the likely visibility of the Proposed Development.

Visual Assessment and Photomontages

4.1. The LVIA includes a series of verified photomontages prepared from representative viewpoints across the study area, illustrating the Proposed Development under both Year 1 and Year 15 scenarios. These visualisations are a key component of the assessment and provide an indication of how the development may be perceived over time.

4.2. A review of the photomontages indicates that the predicted level of visibility is closely linked to the presence and effectiveness of vegetation screening, particularly along field boundaries and around the site perimeter.

4.3. The Year 15 visualisations demonstrate a substantial reduction in visibility, with the Proposed Development largely contained by established hedgerows and tree planting. However, it is evident that this level of screening is dependent on the successful establishment and long term growth of mitigation planting.

4.4. In contrast, the Year 1 visualisations indicate that:

Vegetation is already providing a notable degree of screening;

Hedgerows appear relatively continuous and established; and

The Proposed Development is partially filtered in a manner that reduces its visual prominence.

4.5. While the inclusion of a Year 1 scenario is appropriate, the level of vegetation shown at this stage appears optimistic. In practice, newly planted hedgerows and trees would typically:

Require a number of growing seasons to establish;

Exhibit gaps and variability in early years; and

Provide limited effective screening in the short term.

As such, there is potential for the photomontages to underrepresent the visibility of the Proposed Development during the initial operational phase, when mitigation planting has not yet matured.

This is particularly relevant in the context of the existing baseline, where:

The site is located within a relatively open agricultural landscape;

Field boundaries are defined by hedgerows of varying height and density; and

Existing vegetation does not appear to provide consistent or complete screening.

In addition, the photomontages illustrate the Proposed Development under daytime conditions only. Given the inclusion of lighting infrastructure as part of the development, the absence of night-time visualisations limits the ability to fully understand the visual effects associated with the operational phase.

Overall, the photomontages provide a useful indication of the potential long-term appearance of the Proposed Development.

However: The reliance on well-established vegetation within the visualisations may result in an underestimation of visual effects in the early years following construction, particularly for receptors in close proximity to the site.

Lighting and Night-Time Effects

5.1. The Proposed Development includes a range of lighting elements associated with the operation of the Peaker Plant, the above-ground installation (AGI), and the ESB substation. These include floodlighting columns (up to 8m in height), as well as operational and security lighting within the site.

5.2. The potential for lighting to give rise to environmental effects is acknowledged within the EIAR, including within the ecological assessment, which identifies that:

In the absence of mitigation measures, lighting has the potential to result in a permanent significant negative impact on local bat populations, through disturbance to commuting and foraging behaviour.

5.3. While lighting design is stated to accord with best practice guidance, the LVIA does not appear to include a detailed assessment of the landscape and visual effects of artificial lighting, particularly during the operational phase.

5.4. In particular:

There is no clear assessment of night-time visibility of the Proposed Development;

The interaction between lighting and the surrounding rural landscape is not fully explored;
and

The potential for lighting to increase the perceived extent and prominence of the development is not addressed.

This is a notable omission, given the characteristics of the receiving environment, which comprises a predominantly rural and agricultural landscape with low baseline levels of artificial light. In such contexts, the introduction of new lighting can significantly alter the character of the area, particularly during hours of darkness.

Furthermore, while vegetation may provide some degree of screening during daylight hours, its effectiveness in reducing the visual influence of lighting is more limited. Light spill and glow can extend beyond the immediate site and may be perceptible from a wider area than the physical structures themselves.

The absence of night-time visualisations or a dedicated lighting assessment within the LVIA limits the ability to fully understand the visual effects of the Proposed Development.

In this context, the potential for lighting to contribute to increased visual prominence and to alter the character of the local landscape during the operational phase may not be fully represented within the assessment.

Cumulative Landscape and Visual Effects

6.1. The LVIA considers the Proposed Development as part of the wider landscape context, including the presence of existing infrastructure such as the Cashla 220kV substation, the M6/M18 motorway interchange, and the surrounding road network.

6.2. While the site is located within an area that already accommodates elements of infrastructure, the cumulative assessment appears to place emphasis on the existing developed character of the immediate context, rather than fully exploring the combined visual influence of multiple infrastructure elements.

6.3. In particular, the Proposed Development comprises several distinct but interrelated components, including:

The Peaker Plant and associated buildings;

The above-ground installation (AGI), including kiosks, vents and flues;

The ESB substation within the site; and

Associated lighting and ancillary infrastructure.

While some elements are assessed individually, the LVIA provides limited commentary on the combined visual effect of these components as a unified development, particularly when viewed from nearby receptors.

In addition, the Proposed Development introduces a new form of industrial energy infrastructure into a landscape that is currently characterised primarily by agricultural land uses, with infrastructure largely confined to linear elements (e.g. roads and existing utilities).

As such, the development represents not only an addition to the existing landscape, but also a change in the type and intensity of built form, which may not be fully captured through assessment of individual components in isolation.

The LVIA also appears to give limited consideration to:

The sequential experience of receptors travelling along local roads;

The interaction between the Proposed Development and existing infrastructure in combined views; and

The potential for the development to contribute to a perception of increased industrialisation within the local landscape.

While the presence of existing infrastructure is relevant, it does not necessarily reduce the significance of additional development. Instead, it may contribute to a layering of infrastructure, which can increase the overall visual complexity and perceived intensity of development within the landscape.

In this context, the cumulative landscape and visual effects of the Proposed Development, when considered alongside existing and associated infrastructure, may be greater than those presented within the LVIA.

Planning Policy Context

7.1. The Proposed Development falls within the administrative area of the Galway County Council and is therefore subject to the policies and objectives of the Galway County Development Plan 2022–2028.

7.2. The Development Plan includes a number of policies relating to landscape protection, visual amenity, and rural character, which are relevant to the consideration of the Proposed Development.

7.3. In particular, the Plan seeks to:

Protect the intrinsic character and visual quality of the rural landscape;

Ensure that new development is appropriately sited and visually integrated into the receiving environment; and

Avoid development that would result in significant adverse impacts on landscape character or visual amenity, particularly in open or sensitive rural areas.

The receiving landscape in the vicinity of the Proposed Development is characterised by agricultural land uses, field boundary hedgerows, and dispersed rural settlement, with existing infrastructure largely limited to linear elements such as roads and utilities.

While the LVIA concludes that visual effects will be localised and moderate, the findings of this review indicate that:

The extent of visibility may be greater than presented, particularly where vegetation screening is limited or seasonal;

The early operational phase may give rise to increased visual prominence prior to the establishment of mitigation planting; and

The introduction of lighting and industrial infrastructure has the potential to alter the character of the area, particularly during hours of darkness.

7.6. In this context, there is potential for the Proposed Development to conflict with the objectives of the Development Plan relating to the protection of landscape character and

visual amenity, particularly where effects may be more pronounced than those identified within the LVIA.

Summary and Conclusions

8.1. This review has considered the Landscape and Visual Impact Assessment (LVIA) prepared in support of the proposed Cashla Peaker Plant development.

8.2. The LVIA adopts a structured methodology and includes a comprehensive suite of visualisations, including ZTV mapping and photomontages, which are consistent with established assessment practice. However, a number of aspects of the assessment introduce uncertainty in the conclusions presented.

8.3. In particular:

The vegetation-filtered ZTV relies on assumptions regarding the height, density and continuity of hedgerows and woodland, which may not be consistently representative of conditions across the study area;

The bare-earth ZTV, which indicates a wider extent of potential visibility, is not given equivalent weight in the interpretation of visual effects;

The visualisations place notable emphasis on established vegetation and mitigation planting, which may not reflect the level of visibility during the early years of operation;

The LVIA does not include a detailed assessment of lighting and night-time effects, despite the presence of floodlighting and the acknowledged potential for lighting to result in environmental effects; and

The cumulative effects of the Proposed Development, particularly in combination with existing infrastructure and as a unified development, are not fully explored.

8.4. Taken together, these factors suggest that the level of visibility and visual effect associated with the Proposed Development may be underrepresented, particularly:

In the initial years following construction;

In areas where vegetation is limited, seasonal or actively managed; and

During hours of darkness, when lighting may increase the perceived prominence of the development.

In the context of the policies and objectives of the Galway County Development Plan 2022–2028, which seek to protect landscape character and visual amenity and ensure that development is appropriately integrated within the rural landscape, it is considered that the effects of the Proposed Development may be greater than those presented within the LVIA.

On this basis, further clarification and assessment would be required to fully understand the extent of landscape and visual effects arising from the Proposed Development, particularly in relation to early-stage visibility, vegetation assumptions, and night-time impacts.

Appendix B – Hydrogeology, Groundwater and Karst Assessment Material

B1 Introduction

This appendix provides an overview of the hydrogeological context of the proposed development site, with particular focus on the characteristics and risks associated with karst limestone environments.

It supports the assessment presented in Chapter 8 of this submission and outlines the key factors contributing to groundwater vulnerability and contamination risk.

B2 Karst Limestone Environment

The proposed development is located within a karst limestone geological setting, as identified within the EIAR.

Karst landscapes are characterised by:

- Fissured and fractured bedrock
- Underground drainage systems and conduits
- Rapid infiltration of surface water
- Direct hydraulic connectivity between surface and groundwater

Karst environments are widely recognised, including by the Geological Survey Ireland, as highly vulnerable to groundwater contamination. Guidance notes that groundwater in karst settings can be “particularly vulnerable due to rapid flow and limited attenuation of contaminants.”

Unlike non-karst environments, groundwater flow in karst systems is often rapid and unpredictable, with limited attenuation of contaminants.

B3 Groundwater Vulnerability

Karst limestone is typically classified as having high to extreme groundwater vulnerability.

This reflects:

- The presence of open fissures and conduits
- Thin or absent soil cover in places
- Direct pathways for contaminant transport

Guidance from the Environmental Protection Agency emphasises that groundwater requires protection as a “valuable resource” and highlights the importance of preventing contamination from surface activities.

In rural areas, groundwater may be used for domestic supply, agriculture and livestock, increasing the sensitivity of receptors.

B4 Contamination Pathways

The proposed development introduces a number of potential contamination pathways, including:

- Storage and handling of fuels, including gas and diesel
- Oils, lubricants and other hazardous materials
- Surface water runoff from hardstanding areas
- Accidental spills, leaks or equipment failure
- Construction-related disturbance and drainage

Guidance, including that of the Environmental Protection Agency, notes that contaminants in karst environments can “travel rapidly with little or no natural filtration,” increasing the risk of groundwater pollution.

This significantly increases the risk of groundwater contamination.

B5 Surface Water and Groundwater Interaction

Karst systems often exhibit strong interaction between surface water and groundwater.

Surface water features, including streams and drainage channels, may be directly connected to groundwater through swallow holes or fissures.

This creates the potential for contaminants entering surface water to be transferred rapidly into groundwater systems.

Such interactions increase the complexity of hydrological behaviour and the difficulty of predicting contaminant pathways.

B6 Limitations of Mitigation in Karst Environments

Mitigation measures are typically relied upon in EIAR assessments to reduce the risk of contamination.

However, in karst environments, the effectiveness of such measures is inherently uncertain due to:

- The complexity and variability of subsurface flow pathways
- The potential for undetected fissures or conduits
- The difficulty in containing or intercepting contaminants once released

As a result, mitigation measures cannot be assumed to provide full protection of groundwater resources.

B7 Long-Term and Cumulative Risk

The proposed development has an operational lifespan extending to 2050.

Over such a timeframe, the potential for cumulative impacts increases, including:

- Gradual leakage or contamination
- System degradation or failure
- Increased frequency of operational incidents

In karst environments, contamination may not be immediately detectable and may persist over long periods.

This gives rise to long-term environmental risk.

B8 Implications for Development Suitability

The presence of karst limestone and high groundwater vulnerability is a significant constraint on development.

Such environments require a high degree of precaution due to:

- The sensitivity of groundwater resources
- The potential for rapid and irreversible contamination
- The uncertainty associated with predicting subsurface behaviour

The introduction of large-scale industrial development in this context presents a heightened level of risk.

B9 Conclusion

Karst limestone environments are inherently vulnerable to contamination and present significant challenges for groundwater protection. The combination of rapid groundwater flow, direct surface-groundwater connectivity and limited natural filtration results in a high-risk environment. In this context, the reliance on mitigation measures alone is insufficient to ensure protection of groundwater resources. These factors support the conclusion that the proposed development gives rise to significant hydrogeological risk and that the suitability of the site is fundamentally constrained by its geological characteristics.

B10 References

The information presented in this appendix is informed by established guidance and research on karst hydrogeology and groundwater protection, including:

- Geological Survey Ireland (GSI)
- Environmental Protection Agency (EPA Ireland)
- Environmental Protection Agency – Karst geology and contamination risk
- World Health Organization – Water quality and human health

These sources reflect established scientific understanding of karst environments and groundwater vulnerability.

Appendix C – Historical Aerial Imagery and Site Evolution

This appendix presents a series of historical aerial images of the proposed development site, spanning the period from 2011 to 2025.

The purpose of this analysis is to illustrate changes in land use, ground condition and landscape features over time, and to assess whether the baseline conditions described in the EIAR accurately reflect the current and historical state of the site.

The imagery indicates that the site has undergone progressive change over a relatively recent timeframe, including apparent land modification, drainage and alteration of vegetation patterns. These observations are relevant to the assessment of biodiversity, land and soils, hydrology and archaeological potential.

Aerial Video of the site in 2021 and 2022, <https://youtu.be/10C1YdaQhN4>



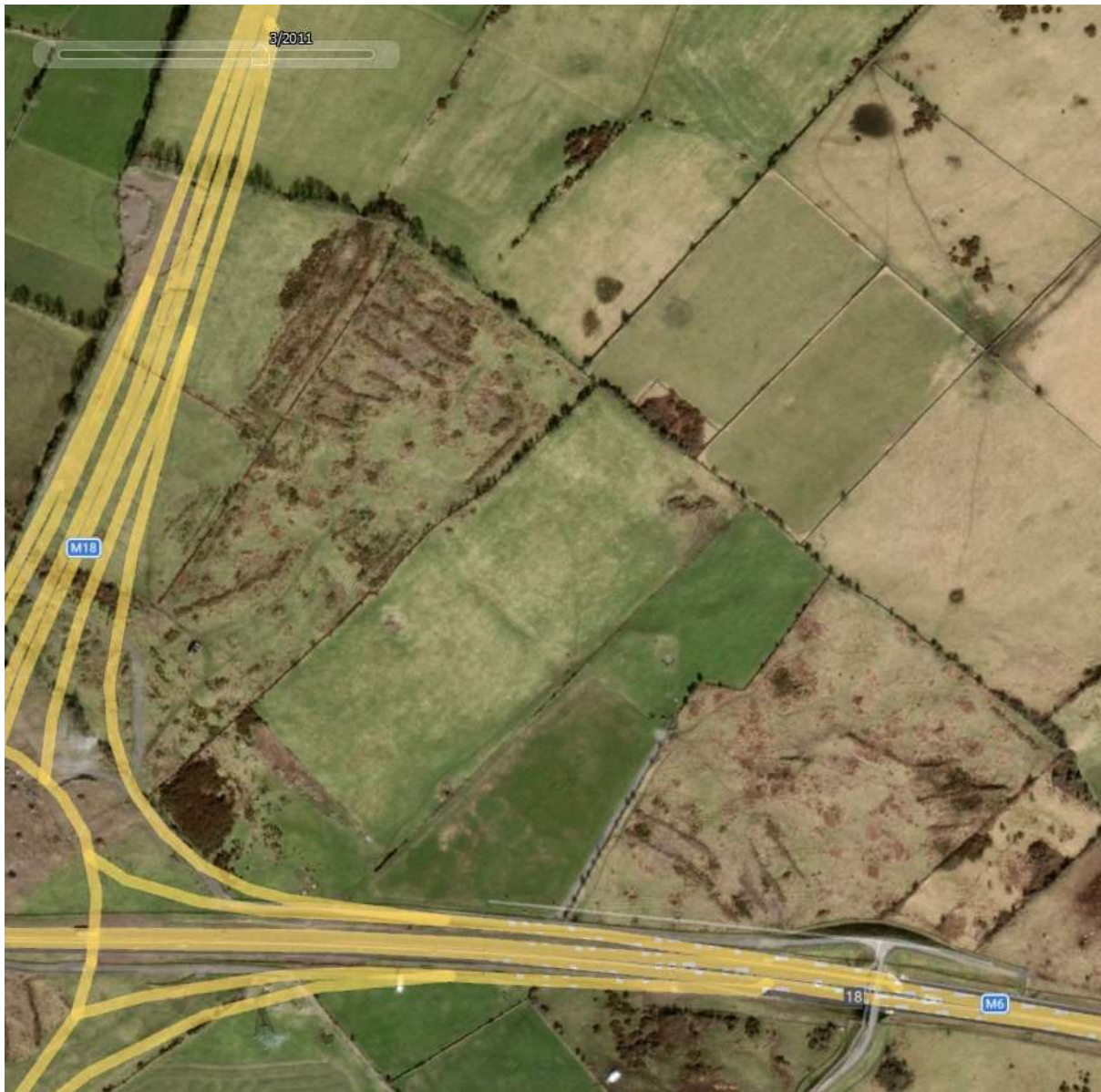


Figure C.1 – Site Aerial Image (March 2011)

The site appears partially undeveloped, with evidence of irregular field structure and areas consistent with wet or poorly drained ground conditions. Vegetation patterns appear varied, suggesting a semi-natural or less intensively managed landscape.

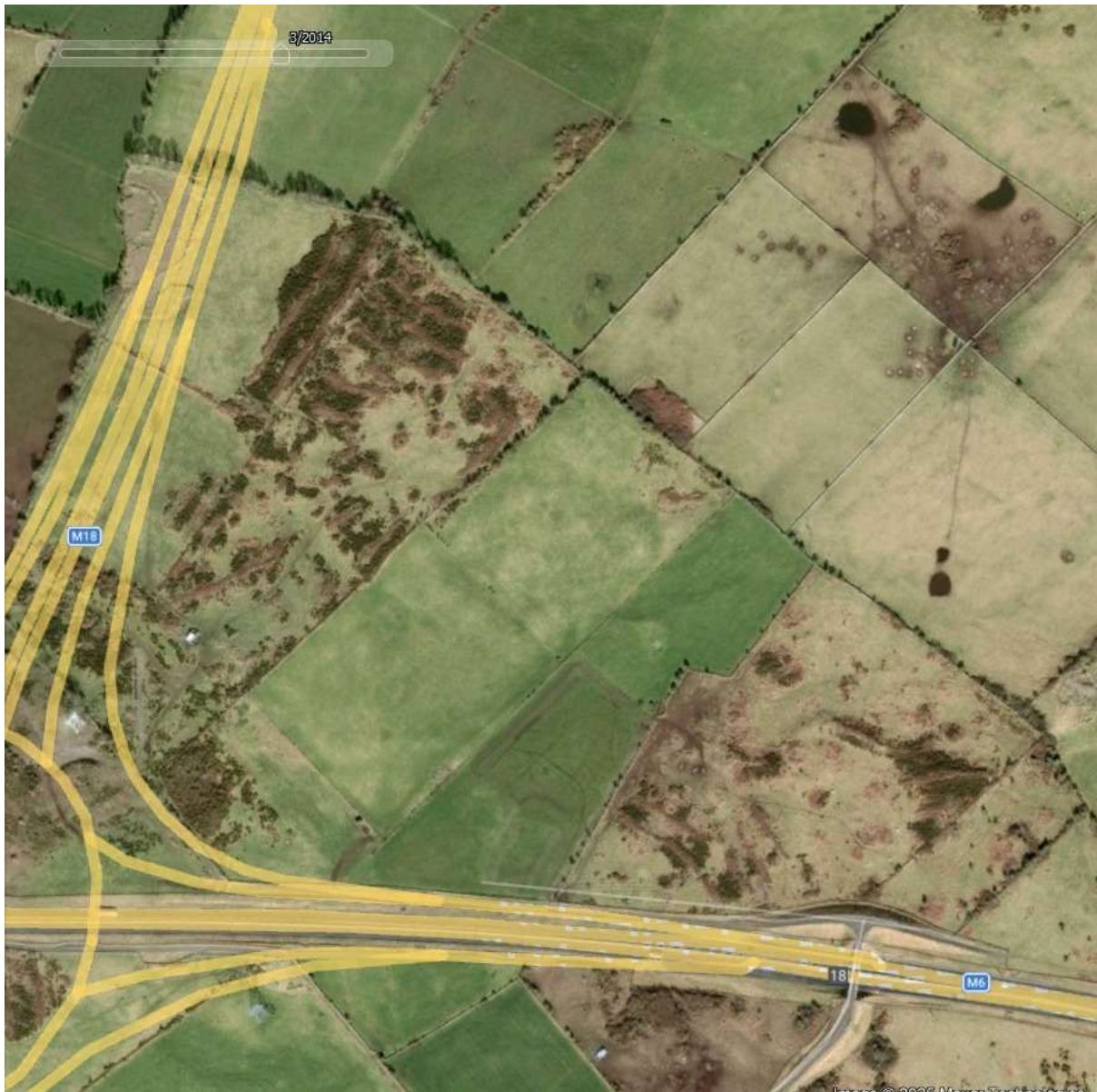


Figure C.2 – Site Aerial Image (March 2014 – View 1)

Early indications of land modification are visible, including changes in field definition and possible drainage or ground disturbance. Variations in surface tone suggest intervention in soil or ground conditions.

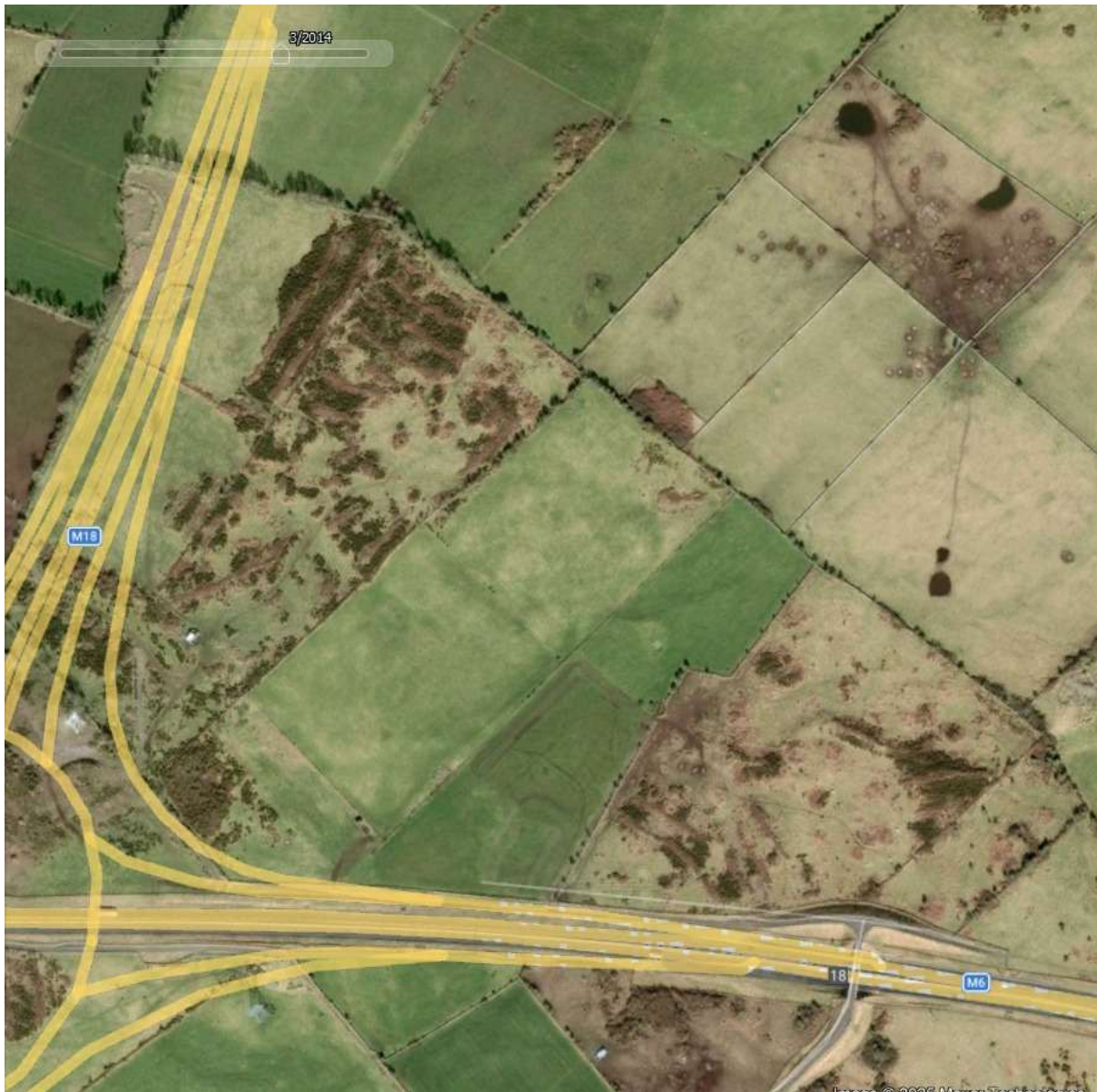


Figure C.3 – Site Aerial Image (March 2014 – View 2)

A second view from the same period shows further evidence of altered ground conditions, including more uniform field boundaries and reduced variability in vegetation. This may indicate ongoing land management or modification activity.

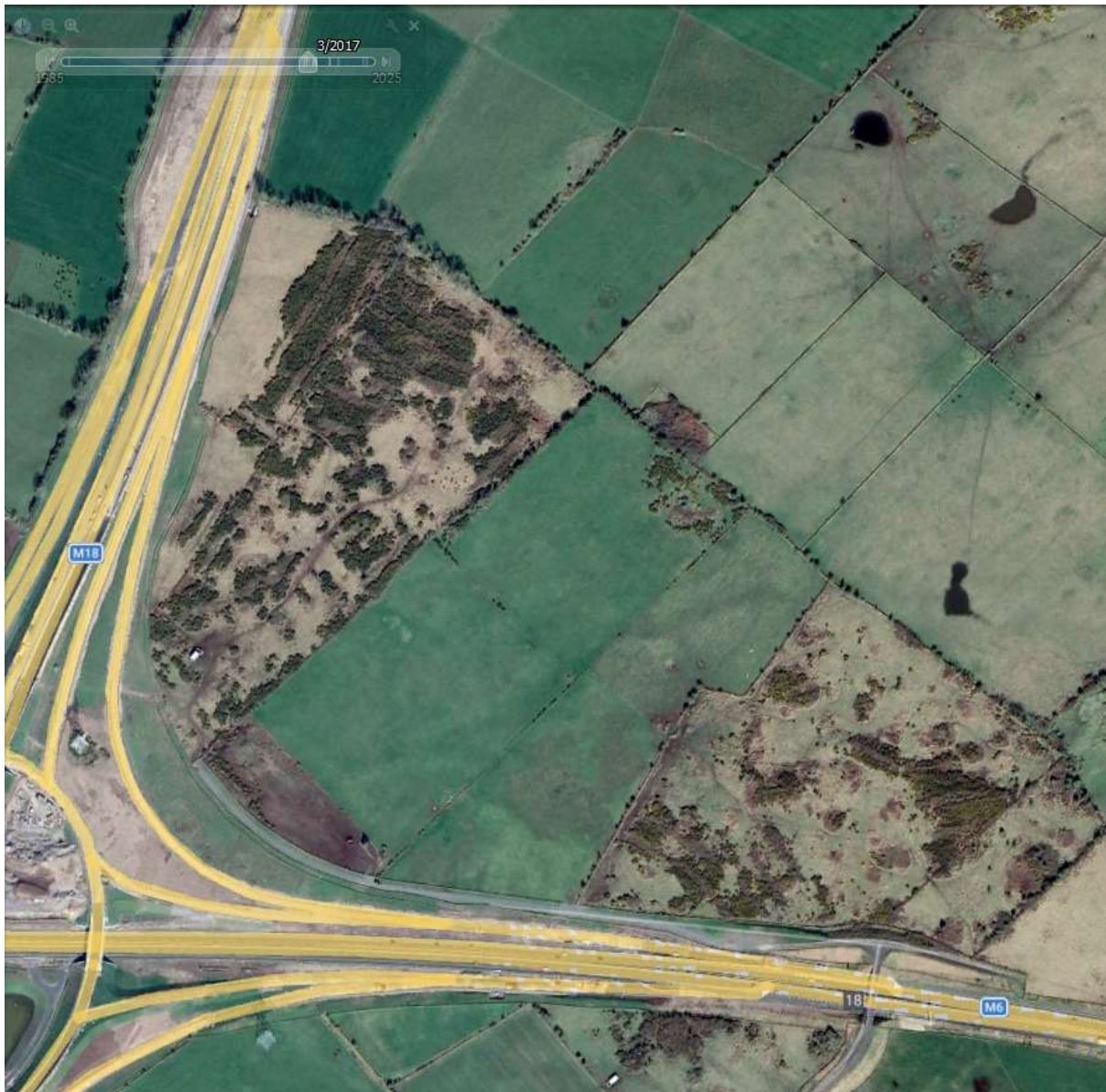


Figure C.4 – Site Aerial Image (March 2017)

The site shows increased uniformity compared to earlier imagery, with reduced evidence of natural variation. This may reflect continued ground modification, drainage or improvement works.

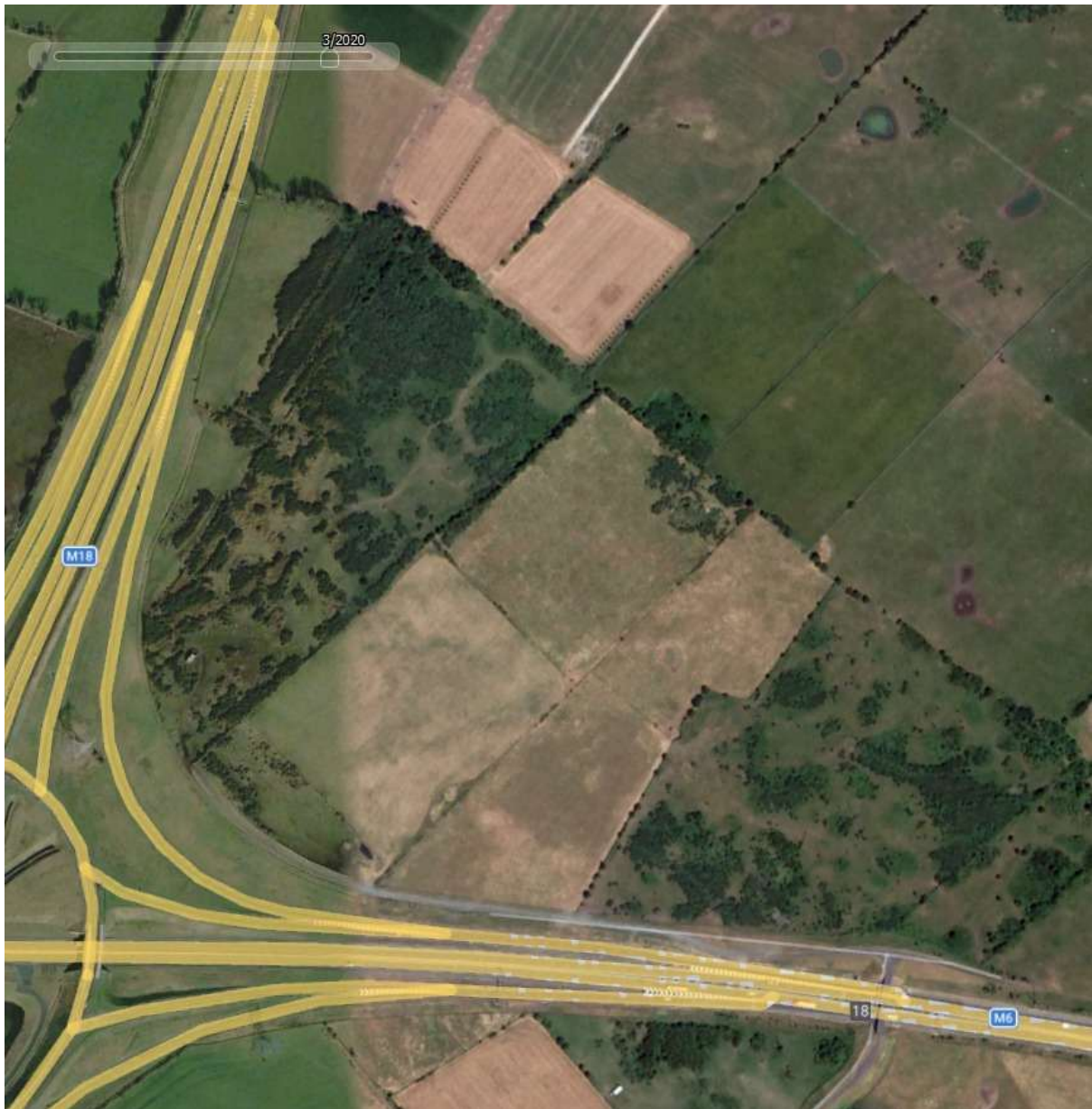


Figure C.5 – Site Aerial Image (March 2020)

The site appears more intensively managed, with consistent surface conditions across much of the area. Natural features such as wet patches or scrub appear less evident, suggesting further alteration of the original ground condition.

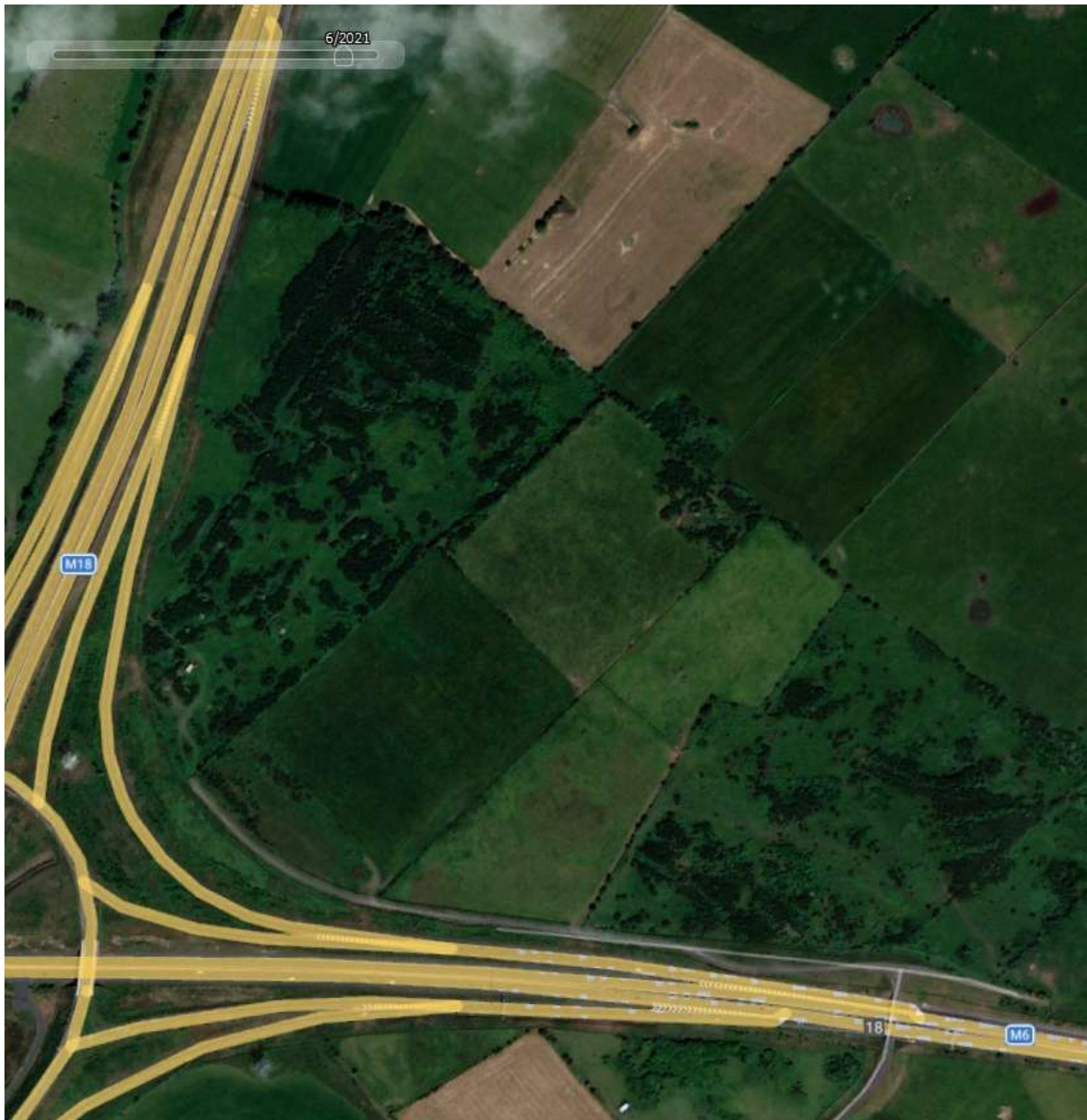


Figure C.6 – Site Aerial Image (June 2021)

The landscape appears increasingly homogenised, with clear evidence of managed agricultural use and limited visible semi-natural features. This indicates a continuation of the trend of land modification.

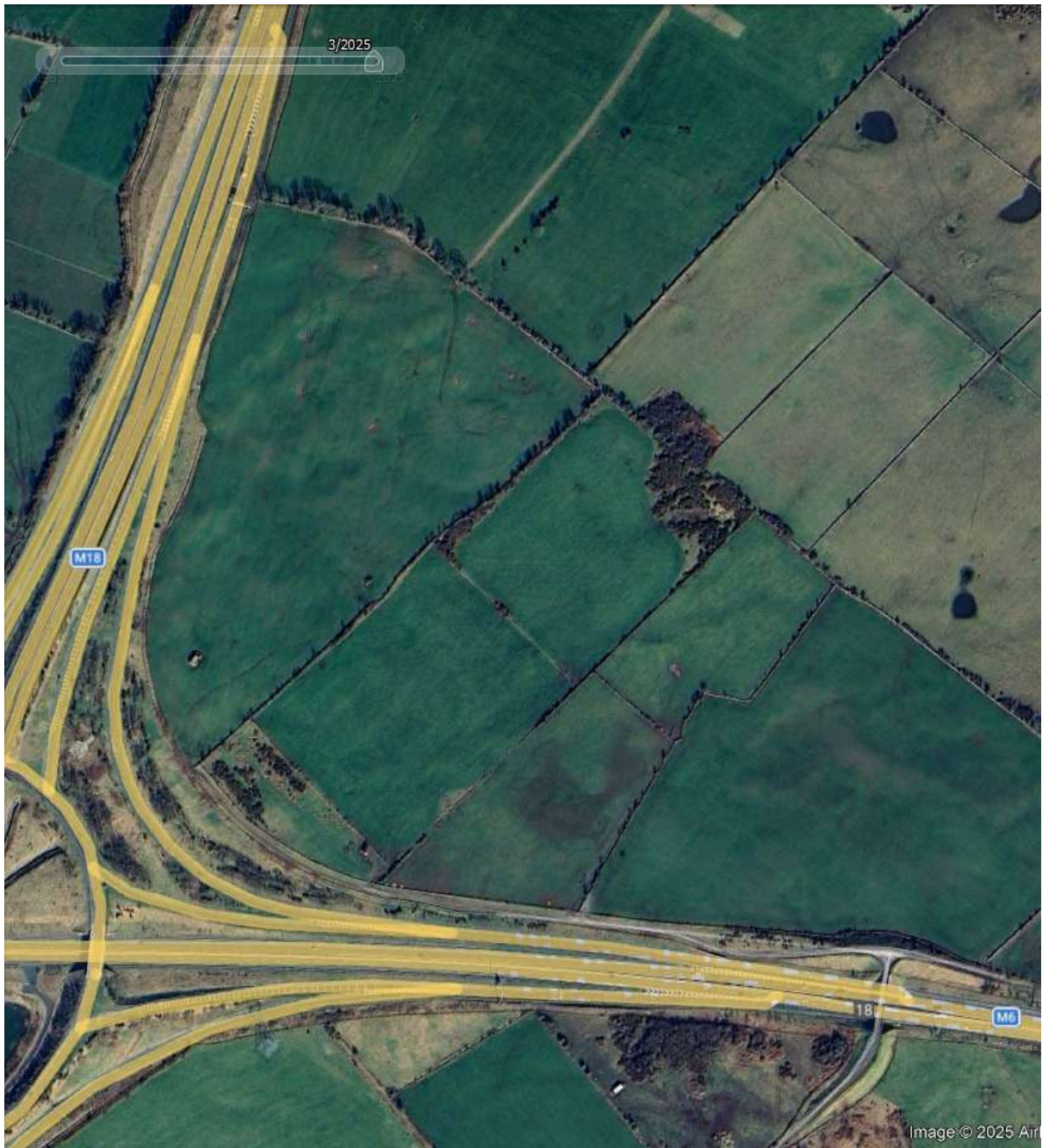


Figure C.7 – Site Aerial Image (March 2025)

The current condition of the site reflects a significantly altered landscape compared to earlier imagery. The site appears uniform and fully managed, with little visible evidence of earlier ground variability or natural features.

The sequence of aerial imagery indicates that the site has undergone progressive change over a relatively recent period.

This raises questions as to whether the baseline conditions described in the EIAR fully reflect the historical and current state of the site, particularly in relation to:

- soil condition and ground stability
- hydrological characteristics
- ecological function
- archaeological potential

Where land modification has occurred, it is necessary to consider whether:

- the current baseline represents a reduced or altered environmental condition
- previously existing habitats or features have been removed
- ground disturbance may have obscured or affected subsurface archaeological remains

In the absence of a clear assessment of land use change over time, the reliability of the EIAR baseline is uncertain.

Appendix D – Athenry Town Centre First Plan (Heritage, Setting and Landscape Context)

D1 Introduction

This appendix provides extracts from the *Athenry Town Centre First Plan* (Galway County Council) relevant to the assessment of cultural heritage, archaeological context, and the relationship between Athenry and its surrounding rural landscape.

The purpose of this appendix is to demonstrate that:

- Athenry is a **heritage town of recognised significance**
 - Its cultural value extends beyond the town core into the **surrounding rural hinterland**
 - Heritage is intrinsically linked to **landscape setting and character**
 - Planning policy requires protection of **both heritage assets and their setting**
-

D2 Heritage Significance of Athenry

The Town Centre First Plan identifies Athenry as:

“one of the best preserved medieval market towns in Ireland” (p.18)

It further confirms:

“Athenry is one of the best-preserved medieval towns in Ireland... Today, Athenry is celebrated for its medieval architecture, castle, and walls, attracting tourists and historians...” (p.21)

These statements demonstrate that Athenry possesses:

- **national-level heritage significance**
 - a strong **medieval identity and continuity**
 - an established role as a **heritage and tourism destination**
-

D3 Relationship with Rural Hinterland

The Plan explicitly identifies the relationship between the town and its wider landscape:

“Athenry town serves a rural hinterland...” (p.18)

“The town is set within agricultural hinterland...” (p.17)

This confirms that:

- Athenry’s heritage value is not confined to the built town centre
- The surrounding rural landscape forms part of its **cultural and historical context**
- The relationship between settlement and agriculture is a defining characteristic

This is directly relevant to the assessment of development located outside the town core.

D4 Heritage and Tourism Function

The Plan highlights the importance of heritage in supporting tourism:

“The town has a historic past, showcased by its leading visitor attraction – Athenry Castle... Athenry has the potential to attract a lot of visitors...” (p.17)

This demonstrates that:

- Cultural heritage contributes to the **local economy**
 - The **visitor experience** depends on the character and setting of the town
 - The wider landscape plays a role in shaping perception of the heritage resource
-

D5 Historic Form and Landscape Context

The Plan describes the structure of the town as:

“The urban form of Athenry stems from its medieval fabric... numerous medieval buildings and features remain... within the historic town walls and the ‘compact’ town centre.” (p.16)

It also identifies:

- a **compact historic core**
- surrounding **agricultural land and open landscape**
- a relationship between **historic settlement and rural hinterland**

This reinforces the importance of:

- **setting and landscape context**
 - visual and spatial relationships
 - continuity between town and countryside
-

D6 Policy Protection of Heritage and Setting

The Plan references policies within the Athenry Local Area Plan:

“Policy ASP 39... seeks to ensure the protection... together with the integrity of their character and setting.” (p.23)

“Policy ASP 40... seeks to protect, conserve and enhance... the character... respecting... setting of the Architectural Conservation Areas.” (p.23)

These policies confirm that:

- Protection extends beyond physical structures
 - **Setting and visual amenity are explicitly protected**
 - Development must be assessed in terms of its **impact on heritage context**
-

D7 Relevance to Cultural Heritage Assessment

The extracts presented above demonstrate that:

- Athenry’s heritage significance is **recognised in statutory planning policy**
- The town is functionally and historically linked to its **rural hinterland**
- Cultural heritage includes:
 - built monuments

- landscape setting
- historic land use patterns

Accordingly:

- Heritage impact cannot be assessed solely on **distance or visibility**
 - Development within the surrounding landscape has the potential to affect:
 - **setting**
 - **character**
 - **perception of heritage assets**
-

D8 Conclusion

The Athenry Town Centre First Plan establishes that:

- Athenry is a **heritage town of national importance**
- Its cultural value is intrinsically linked to its **surrounding landscape**
- Planning policy requires protection of **heritage assets and their setting**

These findings support the conclusions set out in Chapter 12.2 and Chapter 13.5 that:

- the EIAR adopts an overly narrow interpretation of cultural heritage
- the wider cultural landscape has not been adequately assessed
- potential impacts on heritage setting and context cannot be excluded

In this context, the introduction of large-scale industrial development within the rural hinterland of Athenry has the potential to alter landscape character and weaken the relationship between the town and its surrounding agricultural setting. This is inconsistent with the objectives of the Athenry Town Centre First Plan and the Galway County Development Plan, which seek to protect cultural heritage, landscape character and historic context.

Appendix E L7108 Baseline Traffic Survey Community-Conducted Survey – 15th May 2026

Location: Castletambert, L7108 (Eircode H65WY26)

Date: Friday, 15 May 2026

Method: Fixed security camera, 24-hour recording

Surveyed by: Athenry Cashla Peaker Concern Group

Time Period	Car / SUV	Jeep	Jeep towing	Van	Bus	Heavy goods vehicle	Milk Lorry	Tractor	Tractor towing	Motorcycle	Bicycle	Pedestrian	Total
00:00-00:59	2												2
01:00-01:59													0
02:00-02:59													0
03:00-03:59													0
04:00-04:59								1					1
05:00-05:59	2												2
06:00-06:59				1							1		2
07:00-07:59	9	3		4								5	21
08:00-08:59	46	2		5	2	4					2	1	62
09:00-09:59	52	3		1		3							59
10:00-10:59	11			2		1					1		15
11:00-11:59	22			1		4							27
12:00-12:59	26	2		2		7	1	1			3		42
13:00-13:59	19	4		1		1			1			2	28
14:00-14:59	50	4		2	2	3					1		62
15:00-15:59	21	2	2	3		1			1				30
16:00-16:59	28		2	10		2			2		1		45
17:00-17:59	36	5	2	3				1	2		1	1	51
18:00-18:59	46	1	3	4				1	1			1	57
19:00-19:59	24			3								1	28
20:00-20:59	29	1		1								2	33
21:00-21:59	12		2	1					2				17
22:00-22:59	9			1					1			2	13
23:00-23:59	8							1					9
Total	452	27	11	45	4	26	1	5	10	0	10	15	606

Survey Date:	15th May 2026
Location:	Castletambert, H65WY26
Road:	L7108
Weather:	Dry, cloudy, no rain
Surveyor:	Maryrose McGregor

E1 Key Findings

Total Daily Traffic: 606 vehicles

This represents the first and only quantified traffic data for the L7108 — the road subject to a proposed aggregate closure period of approximately **5.5 months** under the Cashla Peaker grid connection project.

Vehicle Composition

- **Passenger vehicles** (cars/SUVs, jeeps, jeeps towing): 490 movements (80.9%)
- **Commercial vehicles** (vans, buses, HGVs, milk lorries): 76 movements (12.5%)
- **Agricultural vehicles** (tractors, tractors towing): 15 movements (2.5%)
- **Active travel** (bicycles, pedestrians): 25 movements (4.1%)

Peak Traffic Periods

- **Morning peak (07:00-09:00):** 83 vehicles
- **Busiest single hour (08:00-09:00):** 62 vehicles
- **Afternoon peak (14:00-15:00):** 62 vehicles
- **Evening peak (16:00-18:00):** 94 vehicles

Agricultural Activity Detail

The survey recorded significant agricultural vehicle movements throughout the day:

- Solo tractors: 5
- Tractors towing equipment: 10
- Jeeps towing trailers: 11 (livestock, silage, farm machinery)
- Milk collection lorries: 1

Total agricultural movements: 26 (15 tractors + 11 jeeps towing agricultural trailers)

E2 Significance

This baseline survey demonstrates that:

1. The L7108 is **not a lightly trafficked rural laneway** — it carries over 600 vehicle movements per day during the active agricultural season
2. The road serves **distinct peak periods** coinciding with school, commuter and agricultural activity
3. **Agricultural traffic is substantial** — 26 movements in a single day contradicts any assumption of occasional or negligible farm vehicle use
4. The **5.5-month proposed closure** would affect 606 daily vehicle movements representing real residents, farmers, businesses, school transport and emergency access

5. **Bord Gáis Energy conducted NO survey** of the Lor L7108 and L109 despite these roads facing the longest closure periods in the entire construction programme

E3 The Baseline Data Gap

The EIAR for the Cashla Peaker grid connection relied on a **single Automatic Traffic Counter (ATC) survey** conducted on the L3103 on **13 February 2025** — a winter weekday during minimal agricultural activity.

No survey of any kind was conducted on:

- The L7108 (subject to 5.5-month closure)
- The L7109 (subject to 3.9-month closure)

The community-conducted survey fills this critical baseline gap with Peak period analysis

- Vehicle composition breakdown by category
- Hourly distribution data
- Agricultural vehicle detail
- Seasonal activity representation (May vs February)

E4 Detailed Breakdown

Passenger Vehicles (490 total):

- Cars/SUVs: 452
- Jeeps: 27
- Jeeps towing trailers: 11

Commercial Vehicles (76 total):

- Vans: 45
- Heavy Goods Vehicles: 26
- Buses: 4
- Milk Lorries: 1

Agricultural Vehicles (15 total):

- Solo tractors: 5
- Tractors towing equipment: 10

Active Travel (25 total):

- Bicycles: 10
- Pedestrians: 15
- Motorcycles: 0

E5 Documentation

The video recording is retained by the Concern Group and available for inspection by An Coimisiún Pleanála if required. Individual vehicle registration numbers are not visible, but all vehicle types, movements and timings are clearly identifiable.

Prepared by: Ahenry Cashla Peaker Concern Group

Date: May 2026

For submission to: An Coimisiún Pleanála (Case Reference: 324162)

Appendix F Species List (M42) and Biodiversity Summary within 10km of Rathmorrissey

This appendix contains species records obtained from the National Biodiversity Data Centre Mapping Portal within a 10km radius of Rathmorrissey (Grid Reference M42). The records are included to demonstrate the ecological sensitivity and biodiversity value of the wider receiving environment surrounding the proposed development.

The records identify a broad range of protected, notable and ecologically sensitive species associated with agricultural landscapes, hedgerows, treelines, drainage corridors, wetland habitats and groundwater-dependent ecosystems within the wider area.

The dataset includes records of:

- protected bat species including Lesser Horseshoe Bat, Leisler's Bat, Daubenton's Bat and Natterer's Bat;
- protected bird species and wintering bird species including Barn Owl, Curlew, Golden Plover, Black-tailed Godwit, Brent Goose, Crane and Corncrake;
- amphibians including Common Frog and Smooth Newt;
- and a wide range of invertebrates, butterflies, moths, flowering plants, mosses and wetland-associated species.

The records indicate the presence of established ecological connectivity and potential commuting corridors associated with hedgerows, treelines, drainage features and interconnected rural habitats throughout the wider landscape.

The biodiversity records further support concerns regarding:

- habitat fragmentation;
- artificial lighting impacts;
- disturbance effects;
- hydrological connectivity;
- and cumulative ecological pressures arising from strategic infrastructure development within the wider receiving environment.

Source: National Biodiversity Data Centre Mapping Portal, accessed May 2026.

The records demonstrate that the wider receiving environment supports a diverse assemblage of protected and conservation-sensitive species and reinforces the ecological sensitivity of the wider landscape surrounding the proposed development.

F1 Protected & Threatened Species – Rathmorrisy 10km

NBDC Records 2022–2025 | Report Date: 25 May 2026

Species	Scientific Name	Group	Count	Last Record	Status
Curlew	Numenius arquata	Bird	14	02/11/2024	Red · EU Annex II
Barn Owl	Tyto alba	Bird	4	09/07/2025	Red · Wildlife Acts
Kestrel	Falco tinnunculus	Bird	46	11/05/2025	Red · Wildlife Acts
Lapwing	Vanellus vanellus	Bird	14	02/11/2024	Red · EU Annex II
Meadow Pipit	Anthus pratensis	Bird	19	09/05/2025	Red · Wildlife Acts
Snipe	Gallinago gallinago	Bird	15	08/11/2024	Red · EU Annex II
Redshank	Tringa totanus	Bird	12	02/02/2024	Red · Wildlife Acts
Grey Wagtail	Motacilla cinerea	Bird	12	02/11/2024	Red · Wildlife Acts
Yellowhammer	Emberiza citrinella	Bird	16	28/07/2024	Red · Wildlife Acts
Dunlin	Calidris alpina	Bird	2	19/11/2022	Red · Wildlife Acts
Redwing	Turdus iliacus	Bird	6	20/01/2024	Red · Wildlife Acts
Shoveler	Spatula clypeata	Bird	2	02/02/2024	Red · EU Annex II
Woodcock	Scolopax rusticola	Bird	5	16/03/2024	Red · EU Annex II
Whooper Swan	Cygnus cygnus	Bird	17	17/12/2024	Amber · EU Annex I
Skylark	Alauda arvensis	Bird	9	14/03/2024	Amber · Wildlife Acts
Swallow	Hirundo rustica	Bird	40	08/05/2025	Amber · Wildlife Acts

Species	Scientific Name	Group	Count	Last Record	Status
House Martin	Delichon urbicum	Bird	15	07/12/2025	Amber · Wildlife Acts
Merlin	Falco columbarius	Bird	3	12/10/2021	Amber · EU Annex I
Lesser Horseshoe Bat	Rhinolophus hipposideros	Mammal	2	23/08/2017	EU Annex II & IV
Daubenton's Bat	Myotis daubentonii	Mammal	58	31/08/2021	EU Annex IV
Leisler's Bat	Nyctalus leisleri	Mammal	21	15/09/2020	EU Annex IV
Soprano Pipistrelle	Pipistrellus pygmaeus	Mammal	29	15/09/2020	EU Annex IV
Otter	Lutra lutra	Mammal	5	13/08/2021	EU Annex II & IV
Pine Marten	Martes martes	Mammal	5	05/01/2021	EU Annex V
Badger	Meles meles	Mammal	74	19/01/2023	Wildlife Acts
European Eel	Anguilla anguilla	Fish	1	23/04/2024	Critically Endangered
Wall (butterfly)	Lasiommata megera	Insect	3	11/06/2021	Endangered
Wood Bitter-vetch	Vicia orobus	Plant	8	02/05/2023	Vulnerable · FPO

Summary:

14 Red List bird species | 5 Amber List bird species | 4 protected bat species | 1 Critically Endangered species

Data Source: National Biodiversity Data Centre (NBDC) mapping portal



Planning & Development
Consultants

Attachment 2

Áine McCann BSc.(Hon)
Environmental Scientist Expert
Observation in respect of
Strategic Infrastructure
Development Planning
Application VA07.324162.

Proposed site at Rathmorrissy looking North



Observations and Objections to Strategic Infrastructure Development Planning Application VA07.324162

Author: Áine McCann BSc.(Hon)
Environmental Scientist
cillinenvironmental@gmail.com



This Document relates to the following Strategic Infrastructure Development Application to An Coimisiún Pleanála:

VA07.324162

**For a 325-340 MW open-cycle gas turbine power plant,
primarily fueled by Natural Gas, 30m fuel emissions
stack,**

Above Ground Installation (AGI),

36m Telecommunications mast,

220kV electric sub-station,

8.1km of electrical cable works

(to connect to the 220kw ESB sub-station at Cashla)

at the town lands of Rathmorrissy, Pollnagroagh,

Moanbaun, Castlelambert,

Knocknacreeva, Caraunduff, Caherbriskaun,

Lisheenkyle East, Barrettspark, and Cashla

by Bord Gais Energy

Statement of authority

The author is a qualified & experienced Environmental Scientist of 20 years' who has, for the last 9 years, consulted on large energy projects and has appeared at An Bord Pleanála oral hearings on the EIA process with regard to same.

She began her career in the environmental sector, focusing on waste management in the early 1990s, establishing the first recycling facilities in both Galway City & County.

She has recently presented to the Joint Committee for Agriculture, Food & the Marine on the development of Biogas in Ireland.

She also has expertise in freshwater algae, with a specialisation in Charophycean species, which are specific to karst environments and serve as high-pollution indicator species.

She has been an experienced bat surveyor since 2006.

As part of her degree, she specialised in hydrology & hydrogeology and Ecology and has strong competence in karst areas. She conducted research for 3 years with Dr. Z. Popper at N.U.I. Galway, researching the polysaccharides of the plant cell wall of Charophycean algae, presented these findings at two Irish Plant Scientist conferences and served as lead author of a paper on AGPs in the cell wall of Charophycean algae.

DISCLAIMER

This report has been prepared by the author with all afforded due skill, care, attention, and diligence within the terms of the agreement with the client. Considering our terms of agreement, time, and resources available and devoted to it, as agreed by the client at that time. We disclaim any responsibility to the client or others for any matters outside the scope of the above. Any such party relies on the report at their own risk.

Purpose of this report

This report was commissioned by Athenry Peaker Plant Concern Group to examine the planning application of Board Gáis Energy for a 325-340 MW open-cycle gas-fired peaker plant (OCGT) primarily fueled by Natural Gas.

30m fuel emissions stack,

Above-Ground Installation (AGI),

36m Telecommunications mast,

220kV electric sub-station,

8.1km of electrical cable works

(to connect to the 220kw ESB sub-station at Cashla)

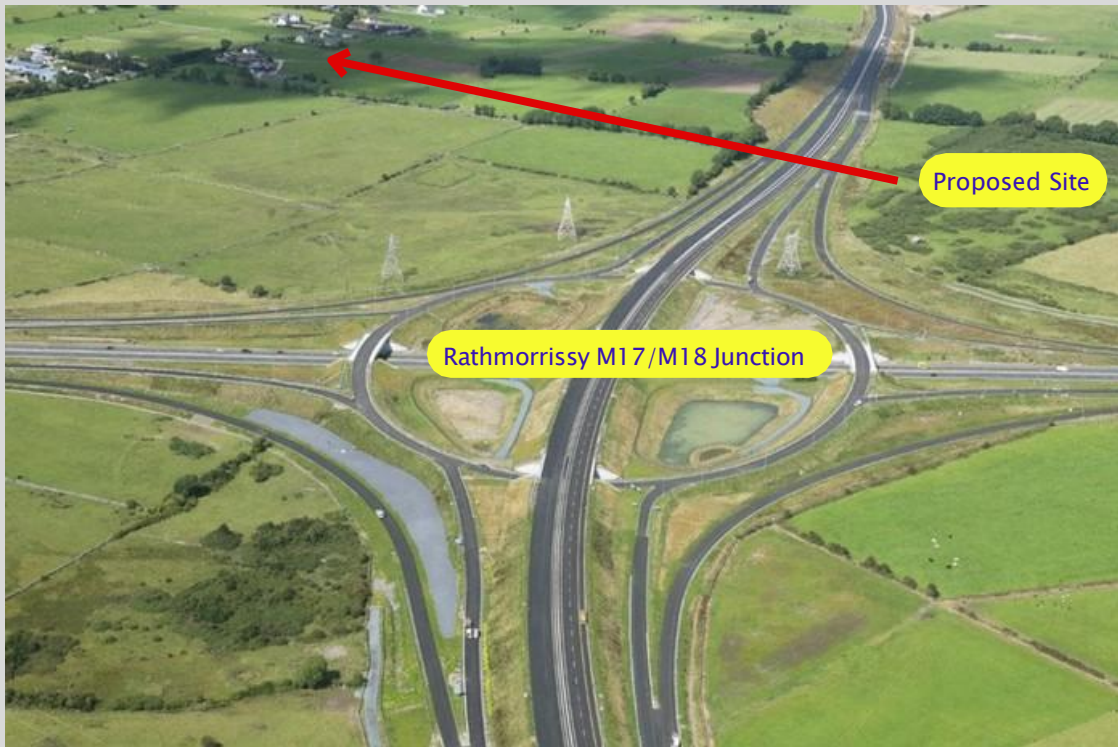
at the town lands of Rathmorrissy, Pollnagroagh, Moanbaun, Castlelambert,

Knocknacreeva, Caraunduff, Caherbriskaun, Lisheenkyle East, Barrettspark, and Cashla.

This is a Strategic Infrastructure Development
Application Preplanning ref:

PA07.324113 & VA07.324162

Nearby homes that will be impacted by fuel stack & light emissions, as well as cable installation



Traffic merging from M17 Tuam motorway onto M18, traveling in the Dublin direction.

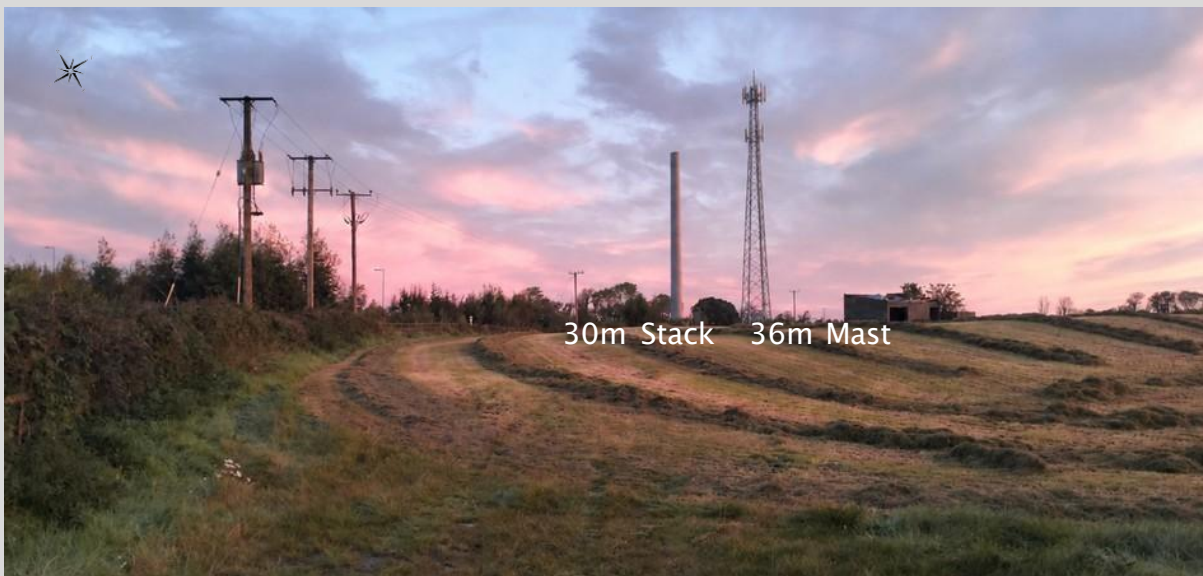
This is a busy intersection. The proposed development will be to the left of the merging traffic and visible to it prior to leaving the M17 and as it exits onto the M18. 30m stack & 36m mast would add to busy skyline



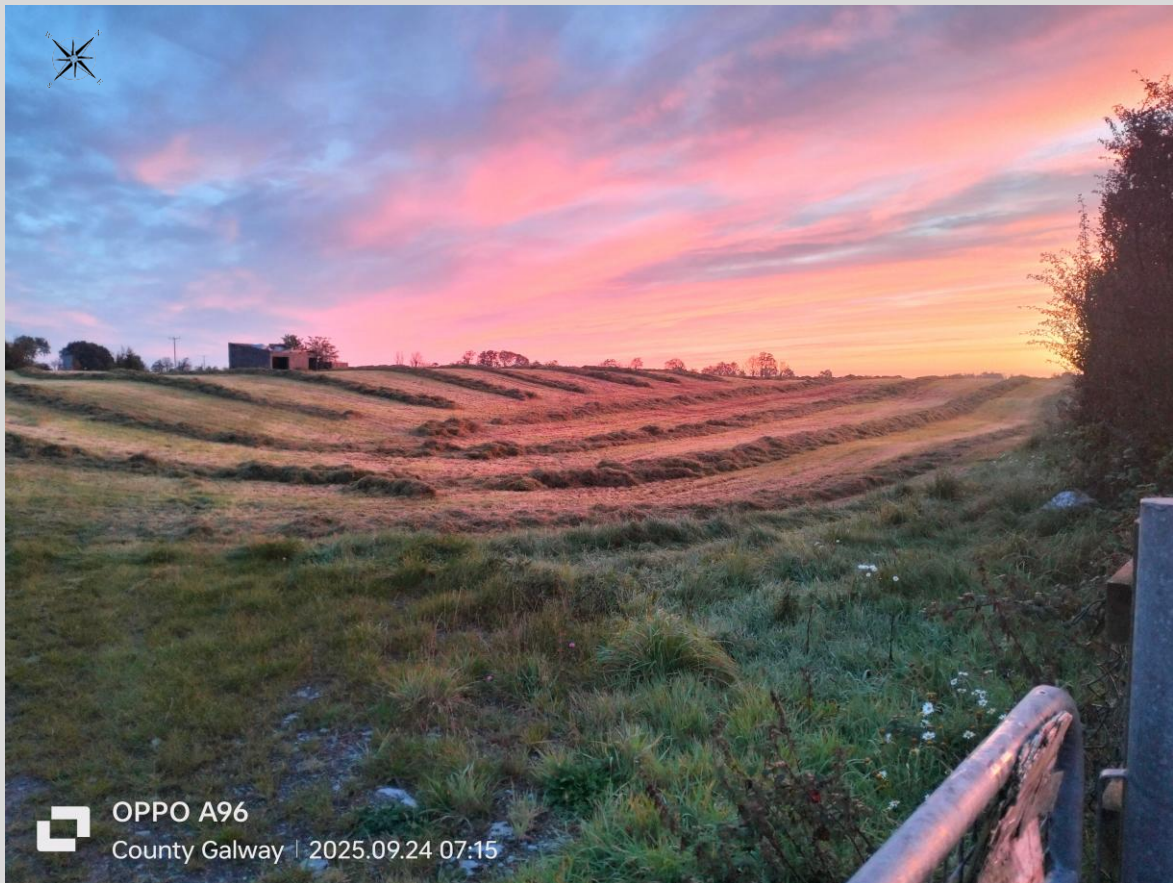


A 30m Telecommunications lattice tower has also been applied for to Galway County Council on 05/02/2025 in this area, which will add to the visual impact. This was granted in November 2025, subject to conditions. (GCC Planning Ref: 2561637)

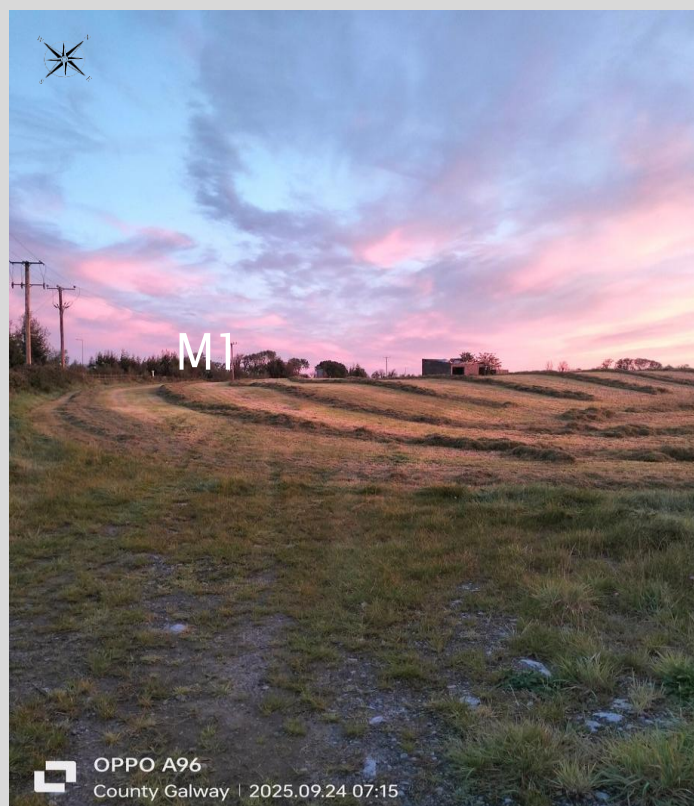
This is not mentioned in the cumulative effects of the EIAR

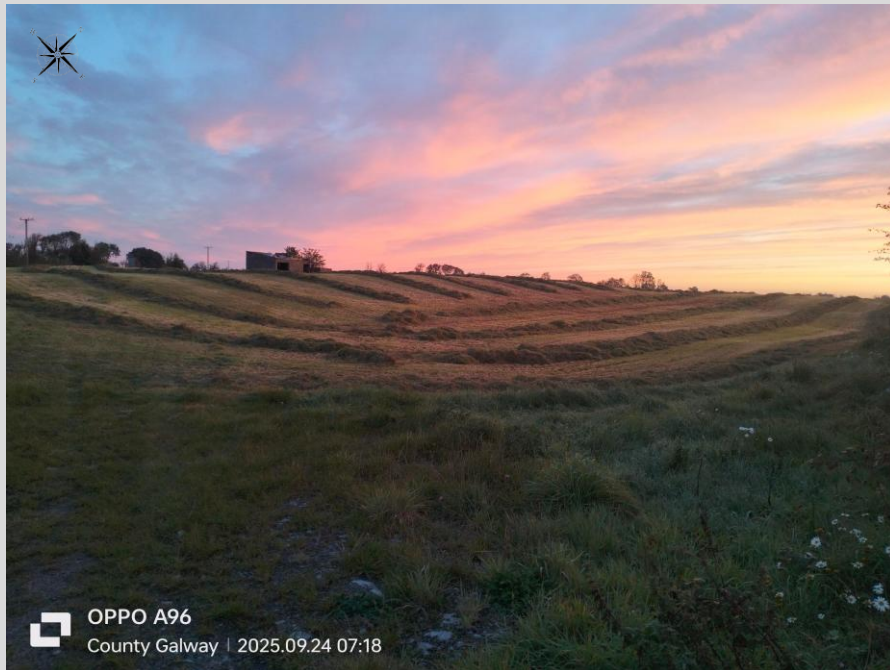


Since no 3D visual information on the proposed development is available, we must make our own assumptions as to the visual impacts



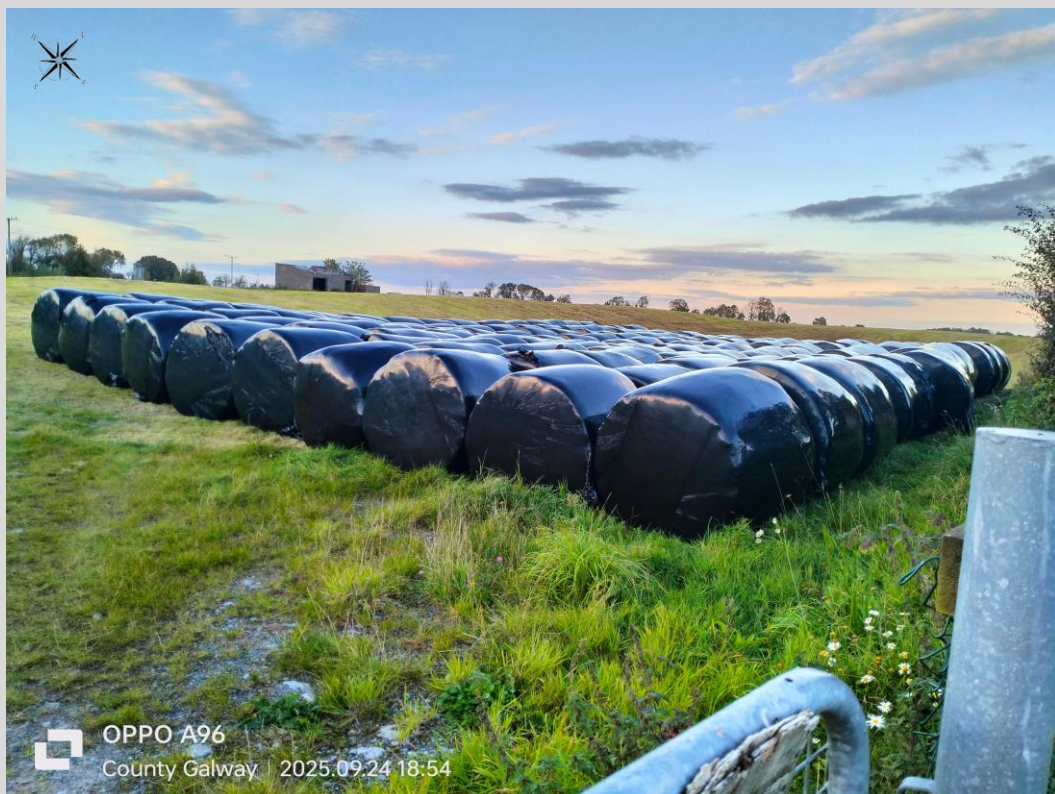
Looking North from the current South entrance to the proposed site. The extent of the difference in elevation across the field is apparent as the Northern boundary is not visible.





The proposed development would require substantial site regrading and engineering preparation, including major cut-and-fill operations, removal of unsuitable excavated material, and large volumes of imported construction material. This indicates that the site is not naturally suited to the proposed built form without significant earthworks and associated disturbance of the underlying karst limestone setting

Average bail depth 1.2m





The dramatic undulation of the proposed site, with a difference of 5m between the South and the North end, contrasts with the flatness of the surrounding fields.





Proposed Site





Proposed Site at
an elevated
location
in a low-lying
area

Emissions, noise, & Light will travel easily in this environment



Looking East to Athenry



Looking East to Athenry



Open flat fields



● Motorway traffic can be seen passing through the gap in the hedge

● Gas Pipeline



 Proposed Site

Looking West to Galway



● Proposed site

Looking West to Galway

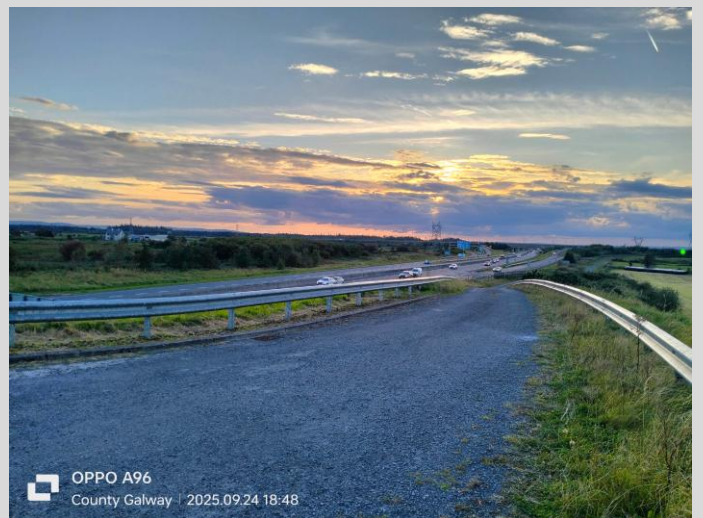
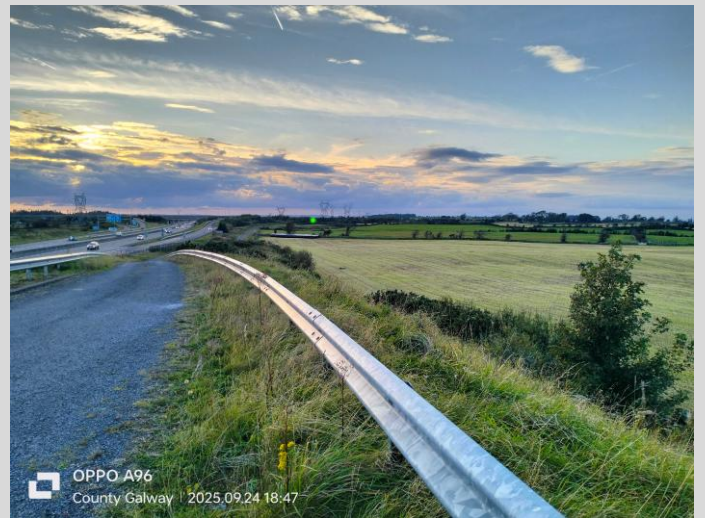


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Chapter 1: Opening Statement

Observations and Objections to the Cashla Peaker Plant and Associated Grid Connection Infrastructure

Strategic Infrastructure Development Applications: PA07.324113 and associated electricity/grid connection application VA07.324162

1.1 Introduction

This opening statement is submitted in objection to the proposed Cashla Peaker Plant(PA07.324113). and its associated infrastructure at Rathmorrissy / Pollnagroagh and along the proposed underground grid connection route to the existing Cashla 220 kV substation(VA07.324162) The proposed development is not merely a single power-plant building on an isolated site. It is a large, integrated energy project comprising a gas-fired open-cycle peaking plant, an Above-Ground Installation, gas infrastructure, a proposed 220 kV substation, a 36 m telecommunications mast, approximately 8.1 km of underground 220 kV cabling, road works, horizontal directional drilling, construction compounds, traffic management, and long-term maintenance obligations.

The purpose of this submission is not to object to energy security in principle. The purpose is to object to this proposal as presented, on this site, through this application structure, and on the basis of the environmental information currently before the public. The central position is straightforward: this is the wrong site, with the wrong cable route, assessed and presented in the wrong way.

The applicant's own documentation treats the peaker plant, the substation, and the underground grid connection as a single combined project for environmental assessment purposes. However, the project is also advanced through separate consent routes and separate application references. That has created confusion for members of the public and has made it more difficult to understand the true scale, physical extent, visual impact, and construction burden of the development as a whole.

1.2 The project must be assessed as one integrated development

The peaker plant cannot operate as proposed without its enabling infrastructure. It requires gas supply infrastructure to fuel the plant, and it requires the substation and underground grid connection to export electricity to the transmission system. The 36 m telecommunications mast is not an unrelated structure: it forms part of the electricity transmission infrastructure located within the same overall Rathmorrissy project site. The approximately 8.1 km underground cable route is likewise not a minor side issue. It is the physical route by which the proposed plant connects to Cashla substation.

The use of separate planning pathways does not change the real-world nature of the proposal. For Environmental Impact Assessment, Appropriate Assessment, and public participation purposes, the competent authority must examine the project as it will function in reality. The Irish and European authorities on project splitting, including O'Grianna, Daly, North Kerry, North Westmeath, Ecologistas and Abraham, support the principle that a functionally interdependent project cannot be artificially narrowed or fragmented in a manner that weakens assessment or public understanding.

The public should not have to reconstruct one industrial energy project from two separate application files, different site notices, different deadlines, cross-references to an EIAR and NIS, and technical appendices. If the project is one combined project for EIA purposes, then it should be presented, assessed and decided as one coherent environmental whole.

1.3 The early project description was materially simplified

The pre-application Inspector's Report under section 37B described the project in simplified terms: a 300 MW open-cycle gas turbine plant, one emissions stack, one electrical transformer, secondary fuel facilities, buildings, an AGI, ancillary grid connection infrastructure and associated works. It also referred briefly to an underground connection to Cashla substation, described as being some 3 km to the west.

By the time of the final EIAR, the project had emerged in broader and more concrete terms. It included a 220 kV substation compound within the site, a 36 m high telecommunications mast, and approximately 8.1 km of underground grid connection works along local roads. Those are not minor details. The mast is one of the tallest structures associated with the development and the cable route is

one of the most geographically extensive and locally disruptive elements of the proposal.

This chronology is important. The issue is not that project design may never evolve. The issue is that the documentation must clearly explain how the project evolved, what is now being consented, which application authorises which element, and how the whole project has been assessed. The present documentation does not communicate that position clearly enough to ordinary members of the public.

1.4 The site description and receiving environment require correction

The receiving environment has not been described with the level of site-specific precision required for a SID application in a karst-sensitive landscape. The pre-application Inspector's Report refers to fields on gently rolling topography, small areas of conifer plantation, ponds possibly turloughs, and land that is generally dry and well drained. That description is too brief, too generalised and potentially misleading.

The main conifer or forested area appears to lie nearly 1 km south-east of the proposed development lands, rather than forming part of the site itself. The description should therefore be corrected so that wider landscape features are not confused with the actual proposed site. The landform is also visibly undulating, with meaningful level changes across the field. This has practical implications for site levelling, cut-and-fill, drainage, runoff, visual impact, and ground disturbance.

The reference to 'ponds' possibly being 'turloughs' should not have been left unresolved. In a limestone and karst context, ponds, turloughs, swallow features, groundwater pathways and seasonal hydrological behaviour may be directly relevant to Appropriate Assessment, groundwater vulnerability, European sites, wells, drainage, and pollution pathways. The statement that the site is generally dry and well-drained is not an adequate substitute for a proper karst hydrogeological baseline.

1.5 Public visual information is inadequate

The project includes a 30 m emissions stack, a 36 m telecommunications mast, tanks, substation infrastructure, fencing, lighting, access roads, hardstanding, and other plant. Yet the Non-Technical Summary and the main EIAR do not appear to provide a clear, overall, to-scale, three-dimensional visual representation of the entire project. Plan-view drawings and viewpoint maps do not allow the public to understand the development's real-world height, massing, skyline effect, and cumulative visual

presence.

This is particularly concerning because 3D visualisations were commissioned for non-statutory consultation material, yet no 3D image of the whole project appears on the cover of the NTS, on the cover of the main EIAR, or inside those main public-facing volumes. Where visualisations exist and were considered useful for public engagement, they should have been included in the statutory documentation in a clear and accessible form.

The omission is compounded by the treatment of the 36 m mast. The mast is taller than the 30 m stack, physically located within the overall project site, and associated with the separate electricity/grid application. Without a clear integrated visual presentation, the public is not placed in a fair position to understand what the Rathmorrissy site will actually look like if all elements are built.

1.6 The 8.1 km cable route has been under-assessed

The 8.1 km underground cable route is a major construction project in its own right. It affects the L3103, L7108, L71093, and L7109, requires trenching and reinstatement, joint bays, road closures, resurfacing, and three HDD crossings beneath the M6 and M17 motorways. It passes rural roads, hedgerows, trees, stone walls, verges, woodland-edge features, karst groundwater pathways, and community access routes.

The grid connection appears to have been treated too often as an engineering corridor rather than as a route with ecological, hydrological, human-health, transport, property and community consequences. The ecological assessment of the cable route appears weaker than the assessment of the main site. Bird and bat surveys appear focused mainly on the peaker plant site and access road, while the route-wide effects on trees, hedgerows, bats, nesting birds, mammals, invasive species, water pathways and karst-linked receptors require fuller assessment.

The Commission should not allow the separate application structure to result in a lower standard of scrutiny for the grid connection. It is enabling infrastructure without which the plant cannot operate as proposed, and it must be assessed to the same standard as the main generating site.

1.7 Traffic, road closures, L3103 impacts and sustainable mobility

The traffic and road impacts of the proposal are not confined to the main site. The selected site requires a long underground cable route through local roads, full or partial road closures, traffic management, resurfacing, HGV movements, worker vehicles, shuttle arrangements, abnormal-load planning, and construction compounds. The EIAR provides more numerical detail for main-site construction traffic than for the cable-route vehicle movements, leaving the full construction burden on the local road network insufficiently quantified.

The L3103 is not merely a rural access road. It is a key route serving Athenry and the surrounding communities, and it forms part of the functional movement network relevant to walking, cycling, sport, community access, and sustainable mobility. It provides access to homes, farms, businesses, and sporting facilities, including Athenry Athletics Club and Athenry Association Football Club. A traffic assessment based mainly on road capacity does not adequately address road safety, vulnerable road users, active travel, community health, access anxiety, or the practical burden on residents.

The possibility of cumulative impacts with other proposed infrastructure, including wind-farm grid works, further strengthens the need for a robust and enforceable road-closure, traffic, emergency-access, and active-travel mitigation strategy before any permission is granted.

1.8 Castlelambert Bridge and road infrastructure inconsistency

A further inconsistency arises regarding Castlelambert Bridge/Castlelambert Overbridge and the L3103 corridor. The applicant's documentation recognises that Castlelambert Overbridge was not suitable for one of the exceptional abnormal-load routes because of structural limitations. However, an equivalent bridge-specific assessment does not appear to have been carried through for the permanent 220 kV underground cable infrastructure, joint bay works, HDD receptor area, excavation, reinstatement and future maintenance constraints in the same area.

The same location should not be treated as a material structural constraint for one part of the project and as an ordinary road corridor for another. The Commission should require a site-specific civil engineering and heritage-context assessment of Castlelambert Bridge, Castlelambert Overbridge and

the L3103 corridor before any decision is made.

1.9 Human health, vulnerable residents, noise, vibration and structural risk

The construction-stage assessment appears to rely heavily on generic noise criteria, standard mitigation, and rolling works assumptions. However, the EIAR's own figures indicate that homes along the underground cable route may be as close as 10-30 m from works, and that predicted construction noise at such distances may exceed the adopted construction threshold. The conclusion that impacts are not significant depends heavily on assumptions about short duration, but those assumptions do not fully account for advance works, delayed works, repeated disturbance, joint bays, resurfacing, traffic management, deliveries, HDD activities, or unexpected ground conditions.

There is no clear evidence that residents along the route were assessed for medical vulnerability, disability, sensory sensitivity, elderly status, home-based care, respiratory or cardiac illness, shift work, children, or dependence on carers, emergency access, electricity, broadband, telecommunications, mobile signal, alarms, or remote medical monitoring. The assessment, therefore, treats residents too often as generic receptors rather than as real households with differing health and access needs.

There is also no clear commitment to pre-construction structural condition surveys of homes and private property within a defined zone of influence of drilling, trenching, piling, HDD, joint bays, road openings, or heavy plant movements. That is a serious omission in a karst limestone setting where ground behaviour can be variable and where excavation, drilling, vibration, groundwater movement or settlement may affect houses, wells, septic tanks, drains, walls, culverts and outbuildings.

1.10 Inadequate alternatives and site selection

The EIAR identifies proximity to gas and electricity infrastructure as a principal reason for selecting the site. However, the selected location requires an approximately 8.1 km underground grid connection, substantial occupation of local roads, HDD crossings beneath motorway infrastructure, road closures, traffic management, ecological disturbance, and community disruption. These consequences do not appear to have been transparently incorporated into the comparative site-selection exercise from the outset.

The alternatives assessment should have clearly compared specific sites by reference to cable length, road occupation, motorway crossings, bridge constraints, HDD requirements, traffic disruption, ecological risk, karst risk, proximity to homes, community impact, and long-term maintenance burden. Without that information, the public and the Commission cannot know whether a site closer to Cashla substation or west of the motorway could have reduced avoidable impacts.

1.11 Relief sought

For the reasons set out in this opening statement and in the chapters that follow, An Coimisiún Pleanála is respectfully requested to refuse permission, or at a minimum to require further information, revised statutory documentation, and renewed public participation before any decision is made. In particular, the Commission is requested to:

- assess the peaker plant, AGI, gas infrastructure, 220 kV substation, 36 m telecommunications mast, and 8.1 km underground cable route as one integrated project for EIA and AA purposes;
- treat submissions made on either application as submissions on the whole integrated project, so that public participation rights are not lost through application splitting;
- require a corrected and verified site description, including contour information, accurate woodland location, karst hydrogeology, pond/turlough classification, drainage, and groundwater assessment;
- require clear statutory visual material, including integrated 3D views, elevations, cross-sections, and verified photomontages showing the full project together;
- require a full route-wide assessment of the underground cable route, including ecology, hydrology, hydrogeology, traffic, road safety, noise, vibration, human health, vulnerable residents, active travel and property risk;
- require pre-construction structural condition surveys of homes and private structures within the zone of influence of vibration-generating, drilling, trenching, HDD, and heavy plant works;
- require a Critical Access and Utility Continuity Plan for vulnerable residents, emergency services, carers, electricity-dependent medical equipment, telecommunications, and broadband-dependent monitoring;

- require an L3103 Active Travel, Road Safety and Community Access Plan;
- require bridge-specific and heritage-context assessment at Castlelambert Bridge / Castlelambert Overbridge; and
- require a transparent alternatives matrix demonstrating whether a less disruptive site or route was available.

1.12 Closing statement

This objection is not a blanket objection to all energy infrastructure. It is an objection to a proposal that has not been adequately sited, described, visualised, assessed, justified or explained. The community should not be asked to bear the burden of an avoidably long cable route, unclear project splitting, under-assessed construction impacts, unresolved karst and turlough issues, inadequate visual information, and insufficient protection for residents, roads, ecology, and public health.

The Commission is therefore asked to approach the applications with caution and to require a single coherent understanding of the real project before any permission is granted. If the applicant cannot provide complete, clear, and reliable information on the whole integrated project and its effects, permission should be refused.

Chapter 2: An Coimisiún Pleanála Inspector's Report for SID Application and Evolution to Current Application

Cashla Peaker Plant – The 36m Communications Mast, the 8.1 km Grid

Connection, and the Need for a Corrected Receiving Environment Description

This chapter examines how the Cashla Peaker Plant project appears to have evolved from a simplified pre-application description into a materially broader and more complex project by the time of the final Environmental Impact Assessment Report (EIAR). It focuses in particular on the absence, at the pre-application stage, of any clear or express description of the 36m communications mast and the 8.1 km underground grid connection as key project elements, together with the inadequacy of the site description used in the pre-application Inspector's Report.

The concern is not simply that further detail emerged at a later stage. The more important issue is that the development now presented to the public includes integral elements that are visually, functionally, and environmentally important, but which were not clearly presented in the early simplified description. In addition, the description of the receiving environment in the pre-application Inspector's Report is brief, generalised and arguably inaccurate in material respects.

In a Strategic Infrastructure Development (SID) process, that matters because the clarity of the initial project description and the accuracy of the site description directly affect public participation, environmental assessment, and the lawfulness of the decision-making process.

For the reasons set out below, the Inspector's site report should be revisited and the site description rewritten so that it accurately describes the physical site, the surrounding landscape, the true relationship of woodland and hydrological features to the proposed development lands, the undulating landform, and the karst-sensitive context. The documentation should also clearly

explain, in one coherent narrative, the status of the peaker plant, the substation, the 36m communications mast and the 8.1 km underground grid connection, and which application is said to authorise each element.

2.1 The Section 37B Inspector's Report and the Simplified Early Project Description

The relevant pre-application report is Inspector's Report ABP-320975-24, the pre-application consultation report pre-SID application under section 37B of the Planning and Development Act 2000, as amended. On its face, the report records a request from the prospective applicant in October 2024, meetings in January and May 2025, and closure of the consultation process in July 2025.

The description of the proposed development in that report is notably simplified. It refers to a 300MW Open Cycle Gas Turbine plant, one emissions stack of 40–50 metres, one 22 kV electrical transformer, secondary fuel storage and transfer facilities, workshop, stores, car park and administrative buildings, an Above Ground Installation (AGI), ancillary grid connection infrastructure, ancillary site infrastructure and associated landscaping. It also refers, in a short concluding sentence, to an underground connection via the local road network to the Cashla 220 kV substation, stated to be located some 3 km to the west.

The point is not that a pre-application report must contain the same level of technical detail as a final EIAR. The point is that the early description is materially simpler than the project that later emerges from the EIAR process. In particular, the section 37B report does not clearly identify a 36m communications mast within the site, nor does it explain that the project will involve approximately 8.1 km of underground grid connection works. Nor does it set out, in a manner readily understandable to the public, Galway COCO planning authority or board members, that these elements are treated as part of a separate planning pathway under section 182B.

2.2 The Later EIAR: Emergence of the 36m Mast and the 8.1 km Grid Connection

By the time of the final EIAR documentation, the project is described in broader and more concrete terms. The EIAR and the Non-Technical Summary (NTS) both state that the proposed ESB substation compound within the Cashla Peaker Plant site will include a 4-bay 220 kV substation, an Air-Insulated Switchgear building, access road, shunt reactor, lighting, fencing, internal tracks, car parking and a 36m high telecommunications mast. They also state that the project includes approximately 8.1 km of underground grid connection route and cable laying from the proposed ESB substation within the site to the existing Cashla 220 kV substation, predominantly along the local road network.

The same EIAR documentation explains that, although the project has been environmentally assessed as a single combined project, the peaker plant and above-ground installation are to be the subject of a section 37E SID application, while the substation and underground grid connection are to be the subject of a separate section 182B application. On the applicant's own case, therefore, the plant, substation, mast and underground cable route are functionally linked and assessed together for environmental purposes, even though they are procedurally divided between separate applications.

This creates a clear public-participation issue. The 36m mast is not a minor or incidental feature. It is one of the tallest structures associated with the project, is located within the overall site layout, and contributes to the project's visual profile. The 8.1 km grid connection is also not incidental. It extends the project well beyond the main plant site, introduces construction effects along the public road network, and raises separate issues in relation to traffic, noise, vibration, human health, property, hydrology and karst-sensitive ground. If these features were not clearly visible in the earlier simplified project narrative, that raises a legitimate question as to whether the project was initially presented too narrowly to the Galway County Council

Planning Section and to ACP as part of the pre-consultation process for the SID application.

The change in project narrative is also illustrated by the chronology of the EIAR itself. The document history for EIAR Volume 2 shows a series of drafts from June 2025 onward, with final versions dated 10 February 2026 and 17 February 2026. The existence of an evolving design process is unsurprising in itself. However, where important integral elements such as a 36m communications mast and an 8.1 km underground grid connection emerge clearly only in the later material, the planning documentation should openly explain that development, and should not leave the public to infer for themselves which structures belong to which application and how the whole project is to be understood.

2.3 Inadequacy and Inconsistency in the Site Description

The section 37B Inspector's Report contains a short, concise site description. It describes the area as being characterised by fields on 'gently rolling topography', mostly in pasture, with some small areas of conifer plantation. It says that fields are generally bounded by ditches and patchy hedgerows, with many stone walls characteristic of limestone areas. It notes that the motorway junction on raised embankments is the most prominent local feature, refers to a class road running east to west north of the site, states that there are no houses on the site but ribbons of residential development along the road network, refers to a number of small ponds north of the site 'possibly turloughs', and concludes that the site is generally dry and well drained.

That description is inadequate for a site of this sensitivity and is problematic in at least four respects. First, it is too generalised. Secondly, it appears to compress site-specific conditions and wider area features into one short narrative, without distinguishing what lies within the actual development lands from what lies elsewhere in the broader landscape. Thirdly, it leaves unresolved a potentially important hydrological issue by referring to ponds 'possibly turloughs' without resolving whether they are in fact turloughs or hydrologically connected karst features. No mention is made of the area being underlain by karst. Fourthly, it arguably understates the

site's physical complexity by describing the landform as gently rolling and the site as generally dry and well drained (again, both karst features).

The reference to 'small areas of conifer plantation' is especially problematic. The main forest/coniferous area appears to be located some distance from the actual development lands rather than within the site itself. The aerial measurement provided indicates a distance of approximately 937.63 metres between the woodland area and the mapped site area. If so, the pre-application description risks conflating broader landscape features as described in the Galway County Development Plan 2022-2028, which defines two Landscape Character Types and one Landscape Character Unit, with the site itself (Central Galway Complex Landscape Type, Urban Environs Landscape Type, and 6b Southern River Clare Basin Landscape Character Unit). That may sound minor, but an inaccurate site description can distort how the receiving environment is understood and can mask the need for a more precise landscape, hydrology, and karst assessment. It also begs the question of whether the site was actually visited by the inspector, as no photographs are available to support his site assessment & document.

Likewise, the reference to 'ponds, possibly turloughs' is not a trivial passing observation. If the identified ponds are turloughs or are hydrologically connected to karst groundwater systems, that is directly relevant to Appropriate Assessment, groundwater vulnerability, potential pollution pathways, cumulative effects, and the adequacy of baseline hydrological information. Such a matter should not be left unresolved in a site description in circumstances where the EIAR itself identifies karstified limestone geology and the need for careful hydrogeological assessment.

2.4 Aerial Imagery Demonstrates Why the Site Description Requires Revision

The aerial imagery illustrates two specific problems with the existing site description. First, the

conifer/forest area referred to in the report does not appear to lie on the site but rather South-East of it. Secondly, the topography is visibly more uneven and undulating than the phrase ‘gently rolling topography’ suggests.

The first image shows an aerial measurement of approximately 937.63 metres between the forested area and the subject site area. This indicates that the woodland feature is nearly 1 kilometre away. If that measurement is broadly correct, the section 37B report should not describe ‘small areas of conifer plantation’ in a manner that implies that such planting forms part of the site itself unless this is separately verified and mapped.

The second image shows multiple spot elevation points across the field adjoining the M18. Those spot levels range, in the measured area, from approximately 53.88 metres to 58.70 metres above sea level, evidencing a variation of almost 5 metres across that part of the site alone. Even leaving aside the broader site, this is sufficient to demonstrate a distinctly undulating landform. The pictures, therefore, reinforce the argument that the receiving environment should be described in more concrete and measurable terms, with reference to contours, spot heights, slopes, hollows, depressions, and drainage characteristics, rather than in broad generalities. An underlying topography associated with weathered or glaciated karst. These issues are not cosmetic. A more undulating site has implications for visual impact, cut-and-fill requirements, site levelling, drainage design, runoff behaviour, karst vulnerability, groundwater pathways and the practical relationship between the plant and surrounding receptors. Where the landform includes dips, hollows and local depressions, those features should be expressly described because they may bear on ponding, infiltration, groundwater recharge and the susceptibility of the land to disturbance.

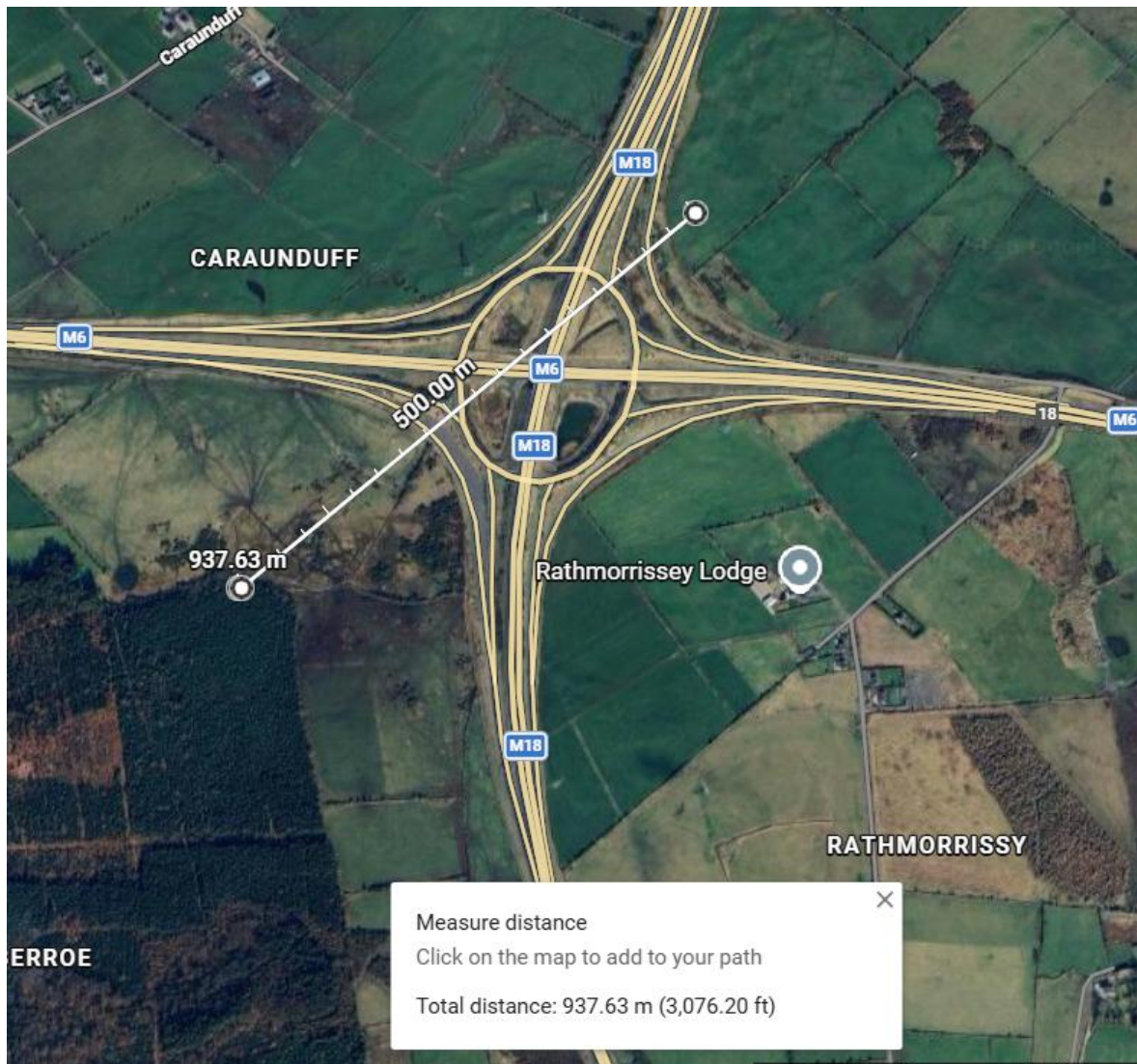


Figure 1. User-supplied aerial measurement indicating an approximate distance of 937.63 metres between the forest / coniferous area and the proposed site area.

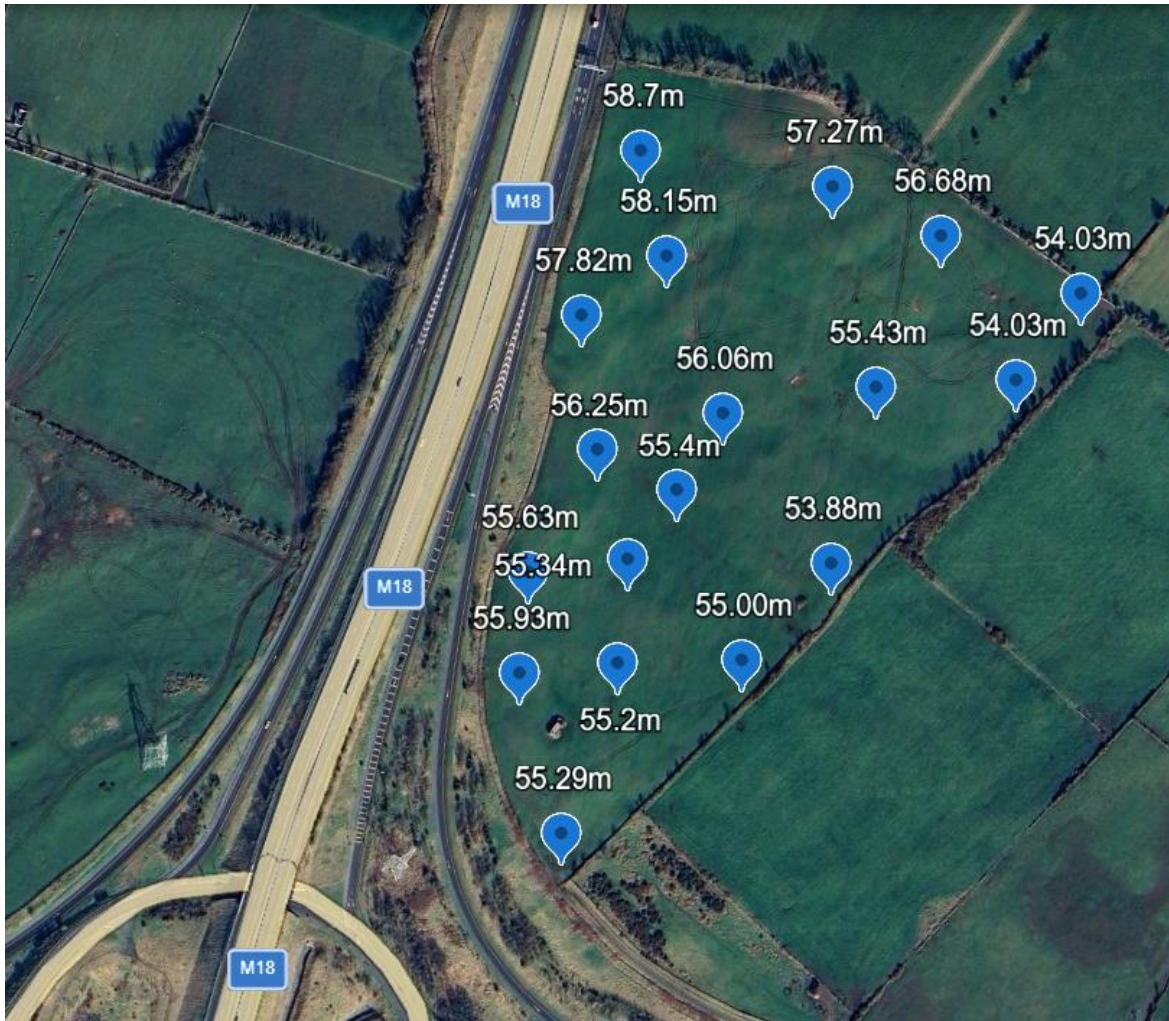


Figure 2. User-supplied spot-elevation image showing multiple levels across the site area, illustrating its visibly undulating topography.

2.5 Karst, Drainage and the Need for a Properly Resolved Baseline

The shortcomings in the site description are particularly significant because this is a limestone and karst-sensitive setting. The EIAR material itself refers to limestone-derived soils, karstified bedrock outcrop or subcrop, field ponds in the Pollnagroagh area, and karst-related constraints. The applicant's own material also records that An Coimisiún Pleanála identified the karst limestone setting as an important matter and advised that a full investigation of potential karst features, including caves, would be required.

In that context, a statement in a pre-application site description that the site is 'generally dry and well drained' is not sufficient unless it is supported by proper hydrological and

hydrogeological analysis. A site may be dry at surface level while still being highly vulnerable because of rapid infiltration, subsurface karst conduits, seasonally responsive groundwater, or hydrological connectivity to turloughs, springs, wells or European sites. Where the receiving environment may be karstic, descriptive shorthand is not enough.

The Board should therefore require a corrected and verified site description supported by contour mapping, site photographs, clear identification of all local ponds and their classification, confirmation of whether any such features are turloughs, and an explicit karst hydrogeological assessment. If uncertainty remains, groundwater tracing and further targeted investigation should be considered. Without this, the baseline description is not sufficiently accurate, objective or complete for a SID application of this nature.

2.6 Relevant Legal Principles and Case Law

A number of Irish and European cases are relevant to the issues arising here. The first and most important group of authorities concerns ‘project splitting’ or ‘salami-slicing’, namely the improper presentation of an integrated project as if it were a smaller or separate series of elements. The second concerns the need for accurate site identification and description.

2.6.1 Integrated project/project splitting cases

In *O’Grianna v An Bord Pleanála* [2014] IEHC 632, the High Court held that a wind farm and its grid connection could not lawfully be treated as if they were unrelated developments for Environmental Impact Assessment purposes. The grid connection was an integral part of the overall project because the wind farm could not operate without it. The case is regularly cited for the proposition that functionally interdependent infrastructure must be considered as part of the real project.

In *Daly v Kilonan Wind Farm Ltd* [2017] IEHC 308, the High Court reinforced the principle that where a grid connection forms part of an overall project requiring EIA, that infrastructure cannot simply be treated as exempt or severed from planning scrutiny. The broader point is that

an integrated project cannot be reduced to a narrower description in a way that obscures any legally required part of the environmental assessment.

In *North Kerry Wind Turbine Awareness Group v An Bord Pleanála* [2017] IEHC 126, the High Court is generally understood to have clarified that separate applications may in some circumstances be pursued, but only where the overall project is still sufficiently described and assessed so that the competent authority and the public can understand the project as a whole. In other words, separate procedural routes do not excuse a fragmented or opaque presentation of the real development.

More recently, *North Westmeath Turbine Action Group & Anor v An Bord Pleanála & Anor*; *Sweetman v An Bord Pleanála & Anor* [2025] IEHC 367 again illustrates the importance of clarity where a project depends on associated grid infrastructure. The case is relevant not because it mechanically compels a single application in every case, but because it underscores that the project, its EIA, and the public-facing description must accurately disclose the development's integrated nature and the role of its enabling infrastructure.

At European Union level, Case C-142/07 *Ecologistas en Acción-CODA* and related case law are relevant to the anti-salami-slicing principle. The Court of Justice has repeatedly made clear that the purpose of the EIA Directive cannot be circumvented by splitting a project into component parts in a manner that prevents the environmental effects of the whole development from being properly understood and assessed. Likewise, Case C-2/07 *Abraham and Others* reflects the principle that assessment must focus on the real project and its environmental effects, rather than on isolated physical works viewed in isolation.

2.6.2 Site identification and site description

The concern about the accuracy of the Inspector's site description is not speculative. In *O'Sullivan v An Bord Pleanála* [2009] IEHC 88, the applicants argued that the Inspector and Board had been mistaken in their identification of the site and that the Inspector's conclusion

was based on observation of the wrong site. The judgment records that the inspector in that case was Mr Philip Davis and that he had visited the site. Relief was ultimately refused, so the case is not authority for the proposition that the decision was quashed because of mistaken site description. Nonetheless, it is a legitimate and safe authority for the narrower point that disputes over site identification and site description do arise in practice, including in cases involving the same inspector.

The proper use of O’Sullivan is therefore this: a previous judicial review involving the same inspector concerned allegations of mistaken site identification or description, although the court ultimately refused relief. That history underlines the importance of careful, accurate, site-specific description where the physical characteristics of the land are in issue. Here, where topography, woodland location, karst vulnerability, ponded features, and drainage characteristics are all contested or uncertain, accuracy is especially important.

2.7 Why the Site Report Should Be Rewritten

The ACP Inspector’s site description for ABP-320975-24 is inadequate and sounds like an excerpt from the Galway County Development Plan 2022-2028 for a general description of the area, as stated above; it should not be relied upon as an accurate description of the receiving environment. The description is brief and generalised. It refers to fields on ‘gently rolling topography’, ‘small areas of conifer plantation’, ‘ponds, possibly turloughs’, and states that the site is ‘generally dry and well drained’. However, it does not provide a site-specific assessment of the actual landform, the variation in elevation across the site, the visibly undulating topography, the hollows and dips evident on the ground and in the supplied imagery, or the implications of these features for drainage, cut-and-fill, karst vulnerability, and groundwater movement.

The reference to ‘small areas of conifer plantation’ should be clarified, as the supplied aerial

material suggests that the relevant forested area lies nearly 1 km away from the proposed site rather than on the site itself. Likewise, the reference to ‘ponds, possibly turloughs’ is significant and should not have been left unresolved. If these features are turloughs or are hydrologically connected to karst groundwater, that is directly relevant to the Habitats Directive, Appropriate Assessment, hydrology, groundwater, and cumulative-impact assessment.

The EIAR itself describes the local landform as undulating lowland and identifies karstified bedrock and related constraints. The applicant’s material also records that An Coimisiún Pleanála specifically noted the karst limestone setting and advised that a full investigation of potential karst features would be required. In that context, a statement that the site is ‘generally dry and well drained’ is insufficient unless supported by site-specific hydrological and hydrogeological evidence, including groundwater tracing where necessary.

The Board should therefore require a corrected and verified site description, including contour mapping, site photographs, confirmation of the actual location of woodland and conifer planting, identification and classification of the ponds north of the site, assessment of whether any are turloughs, a karst hydrogeological assessment, and consideration of the implications for nearby wells and any relevant European sites. Without this, the baseline description is not sufficiently accurate, objective, or complete for a SID application.

2.8 Conclusion and Requested Action

The chronology and documentation in this case support a serious concern that the project was initially described in relatively simple terms at pre-application stage and only later emerged, through the EIAR, as a broader and more complex integrated project involving a 36m communications mast, a proposed 220 kV substation within the site, and approximately 8.1 km of underground grid connection infrastructure. That does not automatically mean the process is unlawful, but it does require the documentation to be especially clear, transparent, and accurate. On the present material, that standard has not been met.

The 36m communications mast and the 8.1 km grid connection are nowhere clearly set out in the simplified section 37B project description in a way that would allow the public to understand their significance from the outset. At the same time, the site description used in the Inspector's Report is too brief and contains material inconsistencies or ambiguities, particularly in relation to the location of woodland, the unresolved status of possible turloughs, the karst-sensitive setting, and the true nature of the site's topography.

The Board should therefore require: (i) a corrected and fully verified site description; (ii) a clear integrated explanation of the whole project, including the plant, substation, 36m mast and 8.1 km grid connection, and which application is said to authorise each element; (iii) revised public-facing documentation so that the project is described coherently and transparently; and (iv) any further hydrological, hydrogeological, topographical or karst investigations necessary to establish a reliable receiving environment baseline.

In the absence of those steps, the current documentation does not provide a sufficiently clear, site-specific, and integrated account of the proposed development or of the receiving environment within which it is to be assessed.

2.9 References

Inspector's Report ABP-320975-24 (pre-application consultation under section 37B of the Planning and Development Act 2000, as amended).

Cashla Peaker Plant, Environmental Impact Assessment Report (EIAR), Volume 2, document reference 0114485DG0005, final revisions dated 10 February 2026 and 17 February 2026.

Cashla Peaker Plant, Environmental Impact Assessment Report (EIAR), Volume 1 – Non-Technical Summary, document reference 0114485DG0036, final dated 17 February 2026.

O'Sullivan v An Bord Pleanála [2009] IEHC 88.

O'Grianna v An Bord Pleanála [2014] IEHC 632.

Daly v Kilronan Wind Farm Ltd [2017] IEHC 308.

North Kerry Wind Turbine Awareness Group v An Bord Pleanála [2017] IEHC 126.

North Westmeath Turbine Action Group & Anor v An Bord Pleanála & Anor; Sweetman v An Bord Pleanála & Anor [2025] IEHC 367.

Case C-142/07 Ecologistas en Acción-CODA v Ayuntamiento de Madrid, EU:C:2008:445.

Case C-2/07 Abraham and Others v Région wallonne and Others, EU:C:2008:133.

Chapter 3: EU Law, Project Splitting, Public Participation and Inadequate Visual Information

This chapter addresses the EU law consequences of presenting a single functionally integrated energy project through multiple planning and consent routes, while failing to give the public a clear, integrated visual understanding of the whole project as it will appear on the Rathmorrissy site and onward to Cashla.

3.1 Summary of the Objection

The core objection is not that EU law requires every Environmental Impact Assessment Report to include a particular form of 3D model. The core objection is that EU law requires the public and the competent authority to be given clear, intelligible, and sufficient environmental information on the project as a whole, before development consent is granted. In this case, the applicant has divided the overall Cashla project across separate consent routes and separate public notices, while the EIAR itself states that the project is a single combined EIA project. The absence of a clear integrated 3D visual representation of the whole project compounds that fragmentation and materially increases the risk that the public cannot understand, and therefore cannot effectively object to, the true scale and visual impact of the development.

Members of the public are already confused by the second application. A reasonable person who saw the first Rathmorrissy site notice could believe that an objection to the peaker plant application was an objection to the overall Cashla project. The later electricity/grid application then presents a separate application for infrastructure that is physically and functionally tied to the same Rathmorrissy site. This includes a 36 m telecommunications mast associated with the 220 kV substation and grid connection. The absence of a clear integrated visual representation in the main public-facing EIAR material makes that confusion more serious, not less.

3.2 Factual Context from the Cashla EIAR

The EIAR confirms that the Proposed Project comprises four main elements: the peaker plant;

the Gas Networks Ireland above-ground installation and gas pipeline; the Electricity Supply Board substation; and the underground grid connection. It further states that the GNI gas pipeline is subject to a separate consent process under section 39A of the Gas Act 1976; that the peaker plant and AGI are to proceed under section 37E; and that the substation and underground grid connection are to proceed by a separate electricity transmission infrastructure application under section 182B. Notwithstanding that split consent structure, the EIAR states that, for EIA purposes, the Proposed Project has been assessed as a single, combined project and that a single EIAR has been prepared for the overall project. [Cashla Peaker Plant EIAR, Vol. 2, pp. 29-30 and pp. 47-48].

The 220 kV underground cable is stated to be approximately 8.1 km in length and to transport electricity from the proposed 220 kV substation connecting the peaker plant to the existing Cashla 220 kV substation. The EIAR further explains that electricity generated by the gas turbine is increased in voltage and exported from the onsite 220 kV AIS via an underground grid connection cable to the existing Cashla 220 kV substation. [Cashla Peaker Plant EIAR, Vol. 2, pp. 92-93].

The electricity transmission infrastructure is not limited to buried cable. The EIAR states that it includes an ESB substation compound within the Cashla Peaker Plant site, a 4-bay 220 kV substation, an AIS substation building, a shunt reactor, lighting, fencing, internal tracks, car parking, and a 36 m high telecommunications mast. [Cashla Peaker Plant EIAR, Vol. 2, p. 47]. The 36 m mast is therefore one of the tallest elements on the Rathmorrissey site. It is taller than the 30 m turbine emissions stack identified elsewhere in the EIAR. Yet the mast is associated with the separate electricity/grid application rather than being clearly presented as part of the first peaker plant application. An ordinary member of the public reading the Rathmorrissey site notices is required to understand a distinction between the narrower "proposed development" in each application and the wider "project" assessed in the EIAR. That is a legally significant

public-participation problem.

Volume 2 also records that 3D visualisations were commissioned for non-statutory consultation and were included in a non-technical brochure and on the project website. [Cashla Peaker Plant EIAR, Vol. 2, consultation section, p. 77]. That does not cure the present defect. Non-statutory consultation material is not a substitute for clear statutory EIAR information. Where the applicant relies on a single EIAR for a split consent structure, the public-facing EIAR and NTS material should clearly show the combined visual reality of the whole development, including the peaker plant, 30 m stack, tanks, AGI, substation, 36 m mast, lighting, security fencing, and associated infrastructure. The objector has been unable to identify any clear integrated 3D representation of the whole project in Volume 1 NTS or in the main body of Volume 2 EIAR.

3.3 EU Law Framework

The relevant EU legal framework is the Environmental Impact Assessment Directive 2011/92/EU, as amended by Directive 2014/52/EU. The Directive requires the likely significant effects of a project on the environment to be identified, described, and assessed before development consent is granted. The assessment must address the real project and its likely significant direct, indirect, cumulative, and interrelated effects. Public participation is not a procedural formality; it is a core guarantee of EU environmental law.

Article 5 and Annex IV require the developer to provide environmental information sufficient to enable assessment of likely significant effects. Article 3 includes landscape among the environmental factors to be assessed. In a case where visual scale and landscape impact are central issues, the public must be able to understand the visual envelope of the project. Article 6 requires public participation when all options are still open and before development consent is granted. Article 11 requires access to review the procedural and substantive legality of decisions subject to the Directive.

The question is therefore not whether a 3D model is mandated in every project. It is whether, in this particular case, the material placed before the public is sufficiently clear, intelligible, and complete to allow effective participation in the assessment of the whole project. The answer is no. The split application structure and the lack of a clear integrated visual representation of the overall Rathmorrissy development combine to obscure the true scale, appearance, and environmental effects of the project.

3.4 CJEU Authorities on Project Splitting and Assessment of the Whole Project

3.4.1 Commission v Ireland, Case C-392/96, ECLI:EU:C:1999:431

Context: This infringement case concerned Ireland's implementation of the EIA Directive and the risk that projects could avoid EIA by thresholds or criteria that failed to capture cumulative effects.

Principle: The Court of Justice held that Member States cannot apply thresholds or criteria in a manner that allows the objective of the EIA Directive to be circumvented. The Directive requires attention to the nature, size, and location of projects and to cumulative effects. A project cannot be made to escape assessment through fragmentation or through a threshold system that ignores the combined environmental effect of related works.

Relevance to Cashla: Cashla is a classic case where the cumulative and functional whole matters. The peaker plant, AGI, gas connection, onsite 220 kV substation, 36 m mast, and 8.1 km grid connection are presented through multiple consent routes, yet they are functionally interdependent. Commission v Ireland supports the objection that the competent authority must examine the whole project and must not allow a split structure to weaken EIA, public participation or understanding of cumulative visual effects.

3.4.2 Ecologistas en Accion-CODA v Ayuntamiento de Madrid, Case C-142/07, ECLI:EU:C:2008:445

Context: This case concerned the treatment of works forming part of a larger road infrastructure project. The issue was whether a wider project could be broken into smaller elements so that the true environmental effects were not assessed as a whole.

Principle: The Court reaffirmed that the objective of the EIA Directive cannot be avoided by splitting projects. Where works form part of a larger overall project, the assessment must have regard to the cumulative and overall effects of that larger project.

Relevance to Cashla: The Cashla documentation separates the generating plant application from the electricity/grid application, while relying on a single EIAR for the wider project. Ecologistas supports the objector's position that the competent authority must look beyond the legal form of the separate applications and assess the real project: a gas-fired generating station with gas infrastructure, transmission infrastructure, a 36 m mast, and an 8.1 km cable route. It also supports the argument that the public should not have to reconstruct the project from separate files and cross-references.

3.4.3 Umweltanwalt von Karnten v Karntner Landesregierung, Case C-205/08, ECLI:EU:C:2009:767

Context: This case concerned an electricity transmission line project where only part of the line fell within the decision-maker's territorial jurisdiction. The issue was whether assessment could be limited to the national segment, rather than considering the project as a whole.

Principle: The Court held that the Directive must be applied so that a project is not artificially split and thereby removed from proper assessment. The relevant project must be understood by reference to its overall functional reality, not merely by the administrative boundary or consent compartment through which part of it is processed.

Relevance to Cashla: This authority is particularly important because Cashla also concerns electricity transmission infrastructure. The 220 kV substation, 36 m telecommunications mast,

and 8.1 km underground cable are not independent optional works. They are required to export electricity from the peaker plant. Umweltanwalt supports the submission that a competent authority cannot treat the electricity/grid element as a separate environmental reality when it is part of one functional energy project.

3.4.4 Abraham and Others v Region wallonne, Case C-2/07, ECLI:EU:C:2008:133

Context: Abraham concerned works and operational arrangements associated with airport infrastructure. The Court examined whether the legal form and description of the measure could avoid the need to assess the full project effects.

Principle: The Court took a broad, purposive approach to the Directive. It looked at the substance and effects of the development rather than allowing a narrow legal characterisation to control the EIA obligation. Where works or operational changes form part of a broader project, the environmental assessment must be capable of addressing the full environmental consequences.

Relevance to Cashla: The relevance is that the competent authority should assess the project as it will operate in reality, not merely as segmented planning descriptions. The real Cashla project is not just a turbine. It is a gas-fired generation facility dependent on gas infrastructure and grid export infrastructure, including a 36 m mast on the Rathmorrissy site. Abraham supports a broad approach to defining the project for EIA purposes.

3.4.5 Inter-Environnement Wallonie and Bond Beter Leefmilieu Vlaanderen, Case C-411/17, ECLI:EU:C:2019:622

Context: This case concerned the life extension of nuclear power stations and associated works.

The legal issue was whether measures described in legislative or operational terms nevertheless

constituted a project requiring EIA because of their practical and environmental consequences.

Principle: The Court looked to the functional reality of the project and the works necessary to implement it. The EIA obligation cannot be avoided by characterising only one aspect of a wider functional intervention as the relevant project.

Relevance to Cashla: The Cashla applications should be tested in the same practical way. The plant, gas infrastructure, substation, mast, and cable are parts of a functional whole. If the Commission permits each component to be understood separately by the public, while treating the EIAR as integrated only at a technical level, the process risks failing the Directive's requirement to assess the real project before consent is granted.

3.5 CJEU Authorities on Competent Authority Duties, Timing and Public Participation

3.5.1 Commission v Ireland, Case C-50/09, ECLI:EU:C:2011:109

Context: This infringement case concerned whether Irish law properly ensured that the competent authority itself carried out the environmental impact assessment required by the Directive.

Principle: The Court held that the competent authority must itself identify, describe and assess the likely significant environmental effects of the project. It is not sufficient for the authority to merely collect information from the developer or to rely on the existence of an EIAR. The assessment must be a real evaluative exercise by the decision-maker.

Relevance to Cashla: The Commission cannot simply accept the applicant's assertion that a single combined EIAR has been prepared. It must itself carry out a coherent EIA of the whole integrated project. That assessment must include the visual and landscape consequences of the whole Rathmorrissy project, including the 36 m mast and the way the grid application interacts with the peaker plant application. If the information is not clear enough to allow that assessment, the proper response is to require clarification and further public participation, not to proceed on a fragmented record.

3.5.2 Wells, Case C-201/02, ECLI:EU:C:2004:12

Context: Wells concerned the requirement that EIA be carried out before development consent is granted, rather than being postponed to later regulatory or implementation stages.

Principle: The Court confirmed that the Directive requires EIA before consent is granted. The EIA process cannot be sidestepped by leaving material environmental matters to later stages after the main decision has been made.

Relevance to Cashla: If the peaker plant application is determined without the public having a clear visual and environmental understanding of the connected grid/substation/mast application, then the EIA of the whole project is not genuinely occurring before consent. The same applies if the second application is treated as a later technical matter rather than as part of the original functional project. Wells supports the request that no part of the project should be consented until the whole project has been clearly and lawfully assessed.

3.5.3 Altrip, Case C-72/12, ECLI:EU:C:2013:712

Context: Altrip concerned the consequences of procedural defects in EIA and the circumstances in which members of the public may rely on such defects in legal review proceedings.

Principle: The Court recognised that procedural defects in EIA can be legally significant where they may affect the public's rights or the decision-making process. Access to review must not be so restrictive that EIA procedural guarantees become ineffective.

Relevance to Cashla: The present issue is procedural and substantive. If members of the public are confused as to whether they have objected to the whole project, or do not appreciate that a 36 m mast on the Rathmorrissy site belongs to a second application, their Article 6 participation rights are affected. Altrip supports the argument that such procedural confusion is not harmless where it undermines the ability to participate in the EIA of the whole project.

3.5.4 Commission v Germany, Case C-137/14, ECLI:EU:C:2015:683

Context: This infringement case concerned restrictions on access to review in environmental

matters and the extent to which members of the public could rely on breaches of EU environmental procedural rules.

Principle: The Court rejected national rules that made it too difficult to challenge EIA defects. EU law requires effective access to justice in respect of procedural and substantive legality under the EIA Directive.

Relevance to Cashla: Public participation must be effective in practice. It is not enough to say that the information existed somewhere in an 800-page Volume 2, a Volume 3 appendix, a website, or a separate planning file. If the project structure and visual materials are presented in a way that ordinary members of the public cannot readily understand, access to review and public participation are weakened. *Commission v Germany* supports a practical, rights-based approach.

3.5.5 Gruber, Case C-570/13, ECLI:EU:C:2015:231

Context: Gruber concerned the rights of affected members of the public to challenge decisions relating to EIA obligations.

Principle: The Court emphasised that persons affected by a project must have access to review procedures to challenge whether EIA requirements have been complied with. National procedures cannot deprive affected persons of the practical ability to contest environmental legality.

Relevance to Cashla: Local residents and community members should not be forced to guess whether their objection to one application protects their rights in respect of another application for the same integrated project. Gruber supports the argument that the Commission should treat submissions on either file as applying to the whole integrated project, or alternatively require corrected notices and a renewed public participation opportunity.

3.5.6 Flausch and Others, Case C-280/18, ECLI:EU:C:2019:928

Context: Flausch concerned the practical effectiveness of public participation and access to

review in an EIA process. The Court considered whether the arrangements for informing the public and enabling challenge were sufficient in practice.

Principle: Public participation arrangements must not make the exercise of EU environmental rights impossible or excessively difficult. The public must be given a genuine and effective opportunity to know about, understand and participate in the decision-making process.

Relevance to Cashla: The problem here is precisely practical effectiveness. The public is faced with two applications, different application references, different site notices, different dates, dense cross-references, and no clear integrated 3D representation of the whole Rathmorrissey site. Flausch supports the objection that the public participation process must be assessed as it actually operated for ordinary people, not as an abstract paper exercise.

3.6 Application of EU Law to the Absence of Clear Integrated Visual Information

The absence of a clear integrated 3D visual representation is legally relevant because it interacts with the project splitting problem. Standing alone, an EIAR might not always require a 3D model. However, in this case, there are special features that make clear visualisation essential to effective participation:

- The project is admitted by the EIAR to be a single combined EIA project, but it is advanced through separate consent routes.
- The public notices distinguish between the narrower "proposed development" in each application and the wider EIAR "project".
- The second electricity/grid application includes a 36 m telecommunications mast on the Rathmorrissey project site.
- The 36 m mast is taller than the 30 m emissions stack and is therefore a major visual element, not a minor technical detail.
- The main public-facing EIAR material does not give an ordinary member of the public a

clear, integrated 3D understanding of the plant, stack, tanks, AGI, substation, mast, lighting, fencing and associated infrastructure together.

- Members of the public may reasonably have believed that an objection to the first peaker plant application was an objection to the whole project, while the mast and grid infrastructure were in fact carried through a separate application.

This is not an objection based on aesthetics alone. It is an objection based on the legal effectiveness of the EIA process. The public cannot make an informed submission on visual, landscape, residential amenity, cumulative or project-splitting effects unless the public can understand what is proposed as a whole. The absence of an integrated visual representation is therefore evidence of a wider failure to present the project clearly and intelligibly.

3.7 Requested Findings and Relief from the Commission

The Commission is requested to make the following findings or, at minimum, to require the applicant to address the following matters before either application is determined:

- The Cashla Peaker Plant, AGI, gas pipeline, onsite 220 kV substation, 36 m telecommunications mast, and 8.1 km underground cable are one functional project for EIA and public participation purposes.
- The separate application structure has caused, or is objectively capable of causing, public confusion as to the scope of objections and the identity of the project being assessed.
- All submissions made on either application should be treated as submissions on the whole integrated project for EIA and AA purposes.
- The applicant should be required to provide a clear integrated visual presentation of the whole Rathmorrissy development, including the 36 m mast, stack, tanks, AGI, substation, lighting, and fencing, from relevant local viewpoints and from the public road network.
- The Commission should not grant consent for either application unless and until it has carried out a single coherent EIA and AA of the whole integrated project, and unless the

public has had a fair opportunity to comment on the clarified whole-project visual and environmental information.

- If the Commission considers that the existing notices or EIAR material did not clearly communicate the whole project and its visual effects, the applications should be refused or the applicant should be required to re-notify and re-consult on the basis of a clear integrated project description and visualisation package.

3.8 Objection

Athenry Peaker Plant Concern Group submits that the Cashla Peaker Plant documentation fails to provide clear and effective public participation in the EIA of the whole project. The applicant's own EIAR states that the peaker plant, AGI, gas pipeline, substation and underground grid connection are assessed as a single combined project, while the consents are pursued through separate legal routes. The public notices and documents then require ordinary members of the public to distinguish between the narrower "proposed development" in each application and the wider EIAR "project". That distinction is confusing and prejudicial.

The defect is compounded by the treatment of the 36 m telecommunications mast. This is one of the tallest elements on the Rathmorrissy site and is taller than the 30 m emissions stack, yet it is associated with the separate electricity/grid application rather than clearly presented as part of the first peaker plant application. There is no clear, integrated 3D representation in the main public-facing statutory documents that shows the overall visual effect of the plant, stack, tanks, AGI, substation, mast, lighting, fencing, and associated infrastructure together. Members of the public are therefore required to reconstruct the real project by cross-reading two applications, separate site notices, a lengthy Volume 2 EIAR, and further appendices. That is not effective public participation.

The Court of Justice has repeatedly held that the EIA Directive must not be defeated by project splitting or by narrow administrative characterisation of a wider functional project. The

relevant authorities include Commission v Ireland (C-392/96), Ecologistas en Accion-CODA (C-142/07), Umweltanwalt von Karnten (C-205/08), Abraham (C-2/07), Commission v Ireland (C-50/09), Wells (C-201/02), Altrip (C-72/12), Commission v Germany (C-137/14), Gruber (C-570/13), Flausch (C-280/18), and Inter-Environnement Wallonie (C-411/17). Applying those authorities, the Commission must assess the real project as a whole and must ensure that the public had a clear and effective opportunity to participate in that whole-project assessment. For those reasons, the Commission should not determine either application in isolation. It should require clear, integrated visual information and a single coherent assessment of the whole project before any consent is granted. Alternatively, if the Commission is not satisfied that the public has had a fair opportunity to comment on the whole integrated project, the applications should be refused or re-notified.

3.9 Case Reference List

Commission v Ireland, Case C-392/96, ECLI:EU:C:1999:431.

Ecologistas en Accion-CODA v Ayuntamiento de Madrid, Case C-142/07, ECLI:EU:C:2008:445.

Umweltanwalt von Karnten v Karntner Landesregierung, Case C-205/08, ECLI:EU:C:2009:767.

Abraham and Others v Region wallonne, Case C-2/07, ECLI:EU:C:2008:133.

Commission v Ireland, Case C-50/09, ECLI:EU:C:2011:109.

Wells, Case C-201/02, ECLI:EU:C:2004:12.

Gemeinde Altrip and Others, Case C-72/12, ECLI:EU:C:2013:712.

Commission v Germany, Case C-137/14, ECLI:EU:C:2015:683.

Gruber, Case C-570/13, ECLI:EU:C:2015:231.

Flausch and Others, Case C-280/18, ECLI:EU:C:2019:928.

Inter-Environnement Wallonie ASBL and Bond Beter Leefmilieu Vlaanderen ASBL, Case C-

411/17, ECLI:EU:C:2019:622.

Directive 2011/92/EU as amended by Directive 2014/52/EU, in particular Articles 3, 5, 6 and 11 and Annex IV.

3.10 Appendix A: Site Notice Photographs

The following photographs are included as evidence of the public-facing site notices at Rathmorrissy/Pollnagroagh & Cashla. They illustrate the practical difficulty for members of the public in understanding the relationship between the first peaker plant application and the second electricity/grid application.

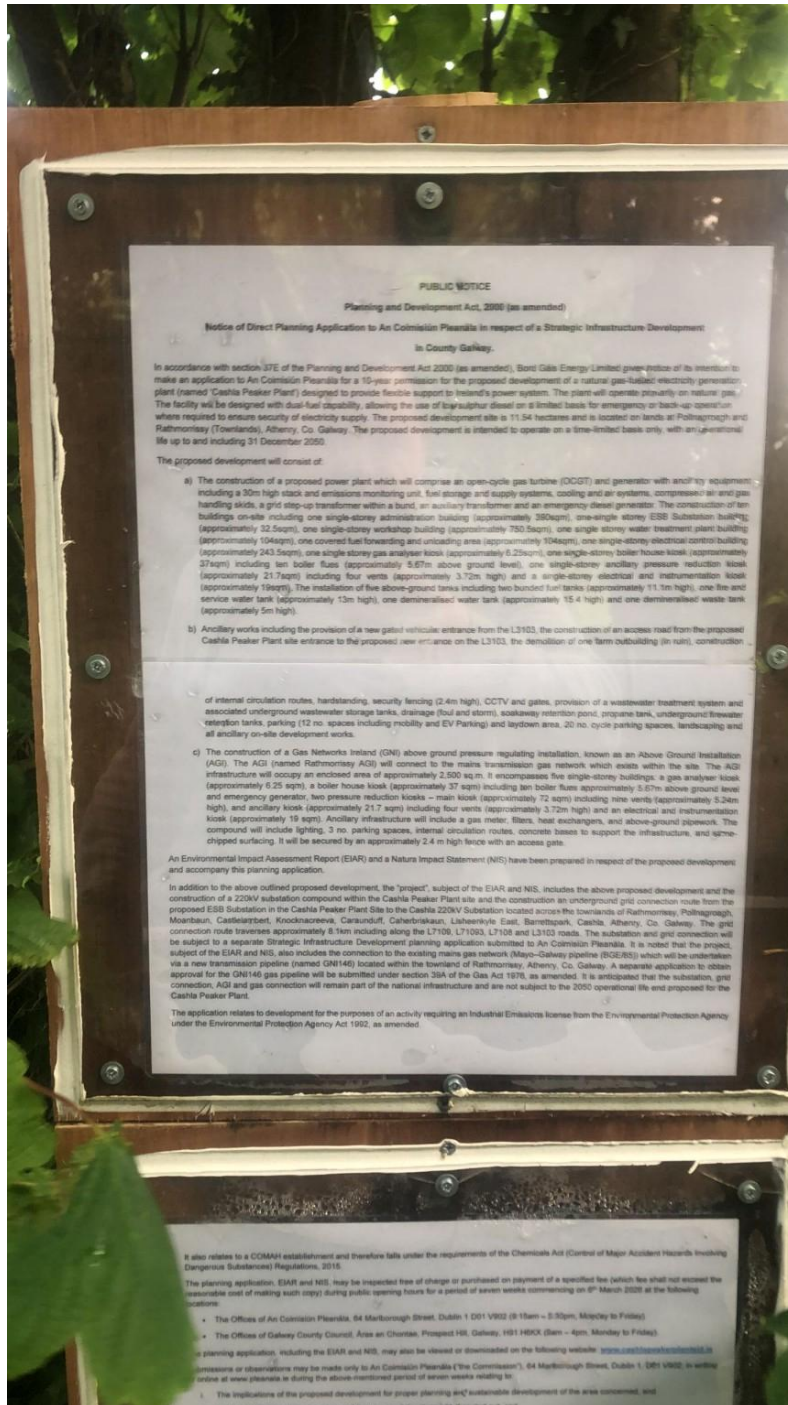


Figure A1: White site notice for the peaker plant application at Rathmorrissy/Pollnagroagh. The wider project is addressed in dense, cross-referenced text rather than in a simple, integrated visual presentation

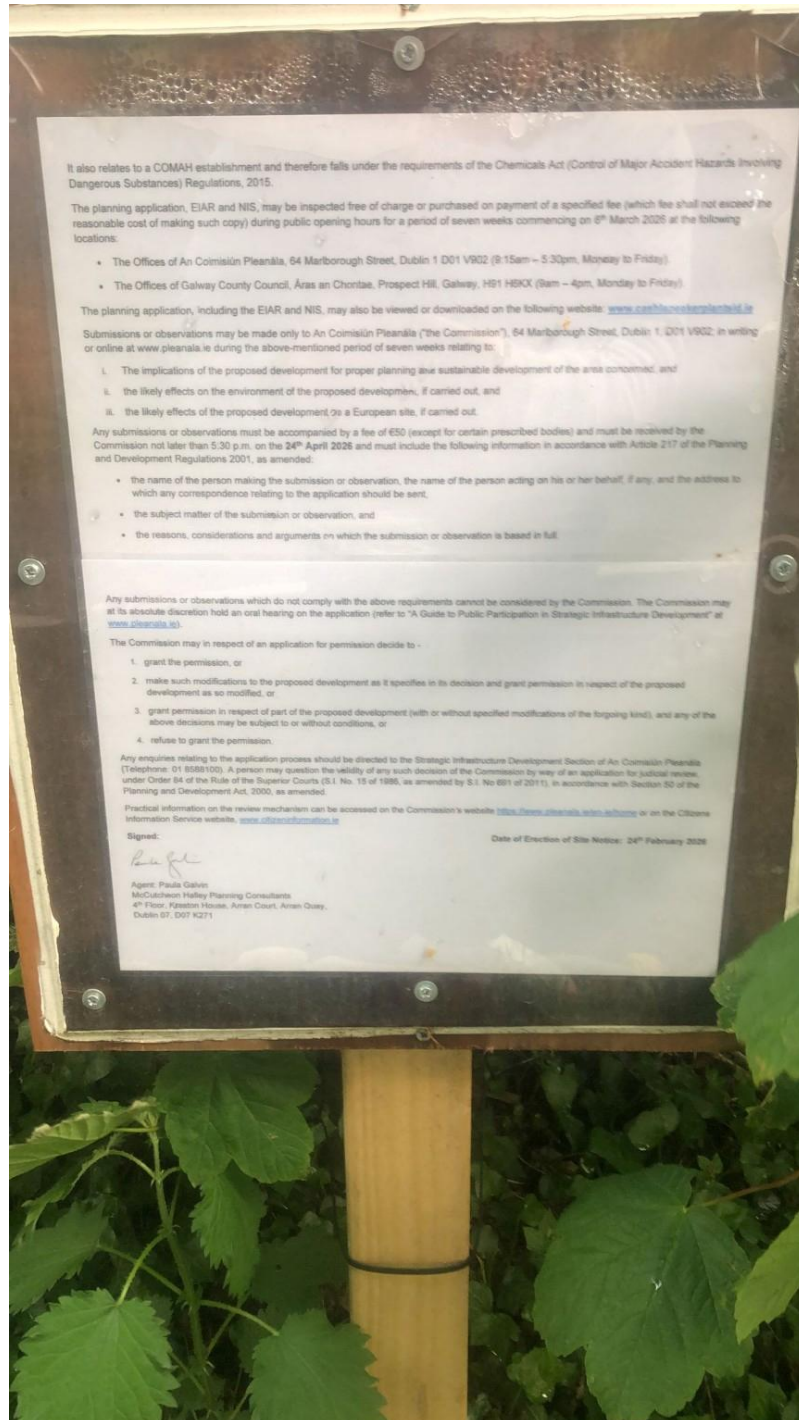


Figure A2: Lower portion of the white site notice, showing the submission period and the practical public-participation information.

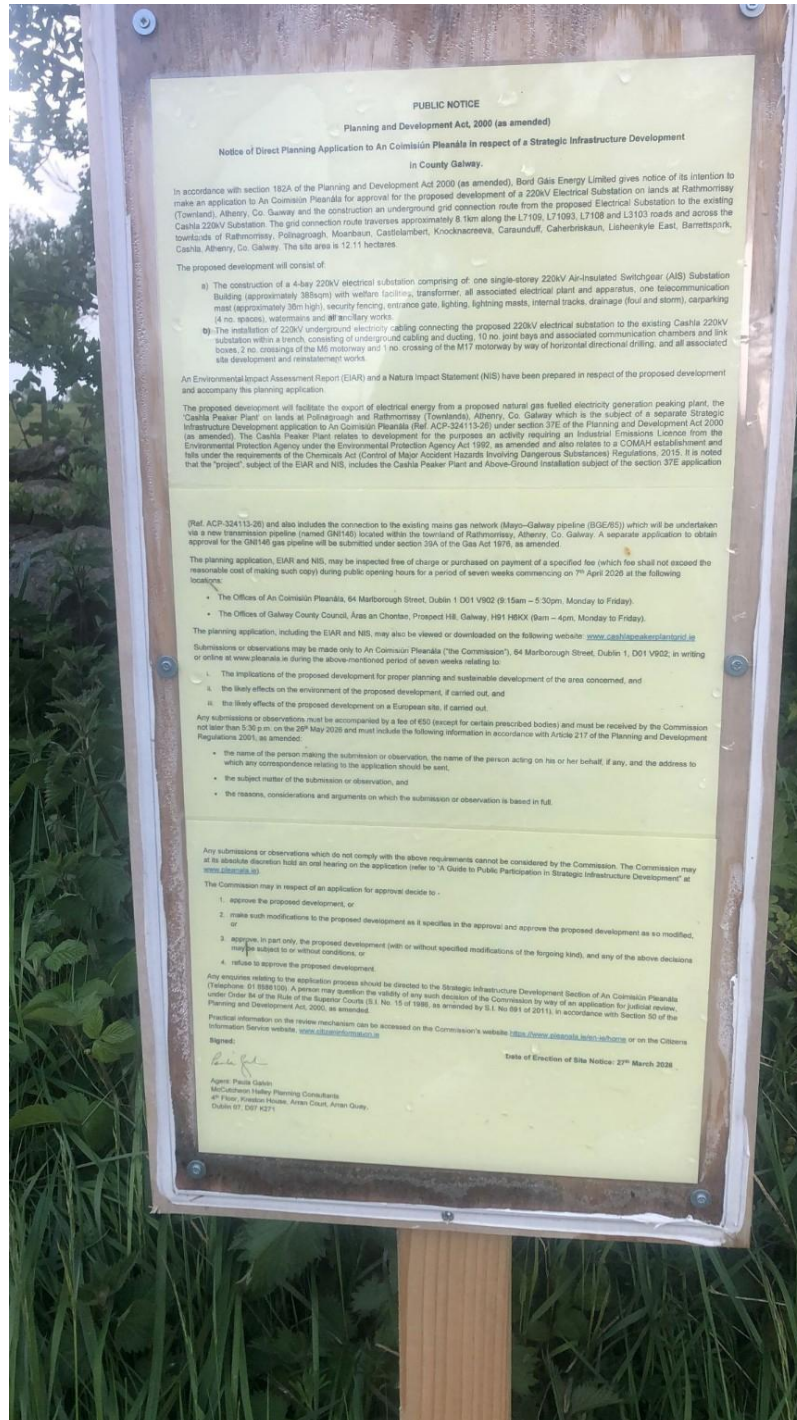


Figure A3: Yellow site notice for the separate electricity/grid application, including the 220 kV substation and underground grid connection. The notice relates to infrastructure that is functionally tied to the peaker plant and Rathmorrissy site.

Chapter 4: Inadequate Overall Visual Information and Public Understanding of Visual Impact

4.1 Introduction

This chapter addresses a public participation and environmental assessment concern arising from the visual material provided in the Environmental Impact Assessment Report documentation for the proposed Cashla Peaker Plant. The concern is that the documentation in Volume 1, the Non-Technical Summary, and Volume 2, the Main EIAR, does not appear to provide the public with a clear, overall, to-scale three-dimensional visual representation of the entire proposed development. In the absence of such a visual, it is difficult for a non-technical member of the public to understand the real-world height, bulk, massing, skyline effect, and cumulative visual presence of the proposed plant and associated infrastructure. This is particularly important because the proposed development is not a single low-level structure. It includes a gas-fired peaker plant, a 30 m stack, fuel storage infrastructure, substation infrastructure, security fencing, lighting, access roads, hardstanding, and a 36 m telecommunications mast. The documentation also identifies another 30 m telecommunications lattice mast proposed in close proximity to the south-east of the main project site. These elements are capable of creating a significant visual impression in the local landscape, particularly for nearby residents, road users, and other visual receptors in the immediate area.

4.2 Visual Information Provided in Volumes 1 and 2

The principal overall visual plan identified in Volume 1 is Figure 1-2, “Proposed Peaker Plant Site Layout”, which appears on page 16 of the Non-Technical Summary. The same general site layout is also provided in Volume 2 on page 33. These figures are useful for identifying the location of structures in plan view, but they do not show the proposed development as a three-dimensional object in the landscape. A plan-view layout does not

adequately communicate height, bulk, scale, massing, or skyline effect.

Volume 1 also contains Figure 6-1 on page 38, which is a Zone of Theoretical Visibility and viewpoint location map. That map assists in identifying potential visibility and the location of viewpoints, but it is not itself a visualisation of the proposed plant. The text on page 38 states that the viewpoint images are illustrated in Appendix 6-1, Volume 3 of the EIAR, and further states that sixteen viewpoints were used for verified photomontage visualisation sequences showing the existing view, Year 1 view, and Year 15 view where relevant. This means that the principal visual material needed to understand how the development would look from viewpoints is directed to an appendix rather than being presented in the main public-facing volumes.

The Non-Technical Summary should allow members of the public to understand the likely significant effects of the project without having to interpret numerous technical documents. However, in this case, the NTS and the Main EIAR appear to rely heavily on plan-view drawings, ZTV mapping, and references to appendices. These materials may be useful for specialists, but they do not provide an easily understandable, overall, scaled visual image of the full development as it would appear in the receiving environment.

4.3 Importance of the Missing Overall 3D Visual

The absence of an overall 3D visual representation is a material issue because the likely visual impact of this project cannot be properly appreciated from a plan-view drawing alone. A member of the public viewing Figure 1-2 can see the arrangement of the site, but cannot readily understand the combined effect of the 30 m stack, the 36 m telecommunications mast, substation apparatus, tanks, fencing, lighting, internal roads, and other plant. The public is therefore left without a straightforward visual aid showing the overall height and mass of the proposed development in context.

This concern is reinforced by the project documentation itself. Volume 1 states that the

proposed peaker plant includes an Open Cycle Gas Turbine, generator, ancillary equipment, and a 30 m high stack. Volume 1 also states that the proposed ESB substation compound within the Cashla Peaker Plant site will include a 36 m high telecommunications mast. Volume 2 separately explains that the proposed stack height is 30 m and that the stack height was selected having regard to, among other matters, the desire to minimise visual impact. Volume 2 also states that the 36 m telecommunications mast will be a free-standing lattice telecommunications mast supporting antennae and communication dishes with associated ground-mounted equipment cabinets.

These are not incidental details. The 36 m mast is taller than the 30 m stack and would be one of the most visually prominent vertical structures on the site. The public should not have to infer the likely visual effect of such infrastructure from a plan drawing or from text alone. An overall 3D image, elevation, or massing visual would assist in understanding the true relationship between the mast, stack, substation compound, buildings, tanks, and surrounding landscape.

4.4 Public Participation Concern

The purpose of environmental assessment documentation is not only to provide technical information to the decision-maker, but also to enable effective public participation. Effective participation requires that the public can understand the likely environmental effects of the proposed development. Visual impact is one of the issues most directly experienced by local communities, and it is also one of the issues that can be most difficult for the public to interpret from technical text alone.

In this case, the documents identify that there will be visual effects from certain viewpoints. The Non-Technical Summary includes a table of residual visual effects and indicates that several viewpoints would experience moderate adverse effects during construction and/or operation. The same documentation also states that 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. However, the NTS and Main EIAR do not appear to present an overall, to-scale 3D visual of the complete development to accompany that assessment.

This creates a gap between the technical conclusion and the public's ability to test or understand that conclusion. Without a clear overall image of the proposed plant, the public is not in a fair position to assess whether the visual impact conclusions are reasonable, whether the mitigation is adequate, or whether the appearance of the development has been accurately and transparently communicated.

4.5 Specific Concern Regarding 3D Visualisations

A further concern is that 3D visualisations were commissioned for the project, yet no 3D picture of the project appears on the cover of the Non-Technical Summary, on the cover of the Main EIAR, or inside either Volume 1 or Volume 2. The cover pages of Volume 1 and Volume 2 show a generic graphic cover for the Cashla Peaker Plant documentation rather than a visual image of the proposed development itself.

Where 3D visualisations have been commissioned, their absence from the main public-facing EIAR volumes is difficult to justify. If such visualisations were prepared to assist stakeholders in understanding what the proposed plant would look like, then they should also be available within the statutory documentation in a clear and accessible format. The omission of any overall 3D picture from the NTS and the Main EIAR reduces the transparency of the visual assessment and limits the ability of the public to understand the practical visual consequences of the project.

4.6 Requested Further Information / Remedy

It is requested that the applicant be required to provide clear, publicly accessible, to-scale visual material showing the entire proposed plant. This should include, at minimum, overall

3D massing views, elevations, cross-sections, and verified photomontages from the nearest residential receptors and public roads. The 36 m telecommunications mast, 30 m stack, substation infrastructure, tanks, buildings, fencing, lighting, and other principal structures should be clearly labelled.

These visuals should be included in the statutory planning documentation and not merely referenced as material used for consultation brochures, display boards, or project websites. The material should be presented in a way that a non-technical member of the public can readily understand. This is necessary to ensure that the visual impact of the proposed development is properly communicated, that the public can participate effectively, and that the decision-maker has before it a transparent and complete presentation of the likely visual effects.

4.7 Conclusion

In conclusion, Volumes 1 and 2 appear to provide plan-view layouts, visibility mapping, technical discussion, and references to appendix-based photomontages, but they do not appear to provide an overall, to-scale, three-dimensional visual representation of the entire proposed plant. This is a significant shortcoming in the presentation of the project to the public, particularly given the presence of a 36 m telecommunications mast, a 30 m stack, major substation infrastructure, tanks, fencing, lighting, and other associated development. The absence of an overall 3D visual in the NTS and Main EIAR makes it more difficult for the public to understand the likely visual impact of the proposed development. This undermines effective public participation and creates uncertainty as to whether the visual impact assessment has been communicated in a sufficiently clear, accessible, and transparent manner.

4.8 Source References Reviewed

1. Volume 1, Non-Technical Summary, cover page: generic document cover; no 3D image of

the proposed plant displayed.

2. Volume 2, Main EIAR, cover page: generic document cover; no 3D image of the proposed plant displayed.

3. Volume 1, Non-Technical Summary, page 16: Figure 1-2, Proposed Peaker Plant Site Layout.

4. Volume 2, Main EIAR, page 33: Figure 1-2, Proposed Peaker Plant Site Layout.

5. Volume 1, Non-Technical Summary, page 17: project description referring to an Open Cycle Gas Turbine, generator, ancillary equipment, and 30 m high stack.

6. Volume 1, Non-Technical Summary, page 21: ESB substation compound including a 36 m high telecommunications mast.

7. Volume 1, Non-Technical Summary, page 38: Zone of Theoretical Visibility and viewpoint locations; viewpoint images and verified photomontage visualisation sequences are stated to be in Appendix 6-1, Volume 3.

8. Volume 1, Non-Technical Summary, pages 40-41 and 81-82: summary of residual visual effects, including moderate adverse effects at a number of viewpoints.

9. Volume 1, Non-Technical Summary, page 70: separate proposed 30 m telecommunications lattice mast in close proximity to the south-east of the main project site.

10. Volume 2, Main EIAR, page 149: proposed stack height of 30 m and discussion of visual impact considerations in stack height selection.

11. Volume 2, Main EIAR, Chapter 14, section 14.4.1.1.7: 36 m high telecommunications mast described as a free-standing lattice mast supporting antennae and communication dishes.

12. Volume 2, Main EIAR, Chapter 16 cumulative assessment: nearby 30 m telecommunications lattice structure identified as a cumulative project.

Chapter 5: Traffic, Road Closures and Underestimation of Construction Impacts

The EIAR quantifies peak main-site construction traffic in terms of staff cars and HGV PCUs, but it does not provide a complete vehicle-movement count for the 8.1 km underground cable route. This is a material omission. The cable route requires prolonged works on the L3103, L7108, and L7109, full road closures on sections of L7108 and L7109, resurfacing works, and HDD operations beneath the M6 and M17. Yet the EIAR does not quantify the total number of cable-drum deliveries, trenching plant movements, excavator movements, HDD rig movements, resurfacing vehicles, reinstatement-material deliveries, spoil/removal trips, or traffic-management vehicle movements. As a result, the traffic impact of the grid connection is understated when compared with the more clearly quantified main-site construction traffic.

5.1 The L3103 is the critical access road and route towards Athenry

The proposed main project site is located approximately 2 km west of Athenry. Access to the site is to be provided by a new approximately 1.15 km access road connecting to the L3103. The EIAR also confirms that the underground grid connection route traverses approximately 8.1 km, including along the L7109, L71093, L7108, and L3103 roads. The L3103 is therefore not a peripheral road in this assessment; it is the principal receiving road for construction access to the peaker plant and AGI and is also directly affected by the underground cable works.

Locally, the L3103 functions as a busy rural approach road into Athenry. A traffic assessment that relies mainly on an assumed link capacity of 1,500 vehicles per hour does not properly address the real-world experience of local residents, farm traffic, school and commuter periods, junction delay, road-narrowing, turning movements, abnormal loads, traffic management, and temporary works. Capacity analysis alone is not an adequate proxy for

amenity, safety, inconvenience, severance, or the ability of residents to go about their daily lives.

5.2 Staff-car estimate is low for a rural working location

Chapter 10 states that at peak construction, up to 150 workers are expected on site. It assumes a car ownership rate of 1.5 and 100% car mode share, resulting in approximately 100 car trips. This equates to 200 one-way staff vehicle movements per peak day: 100 arrivals and 100 departures.

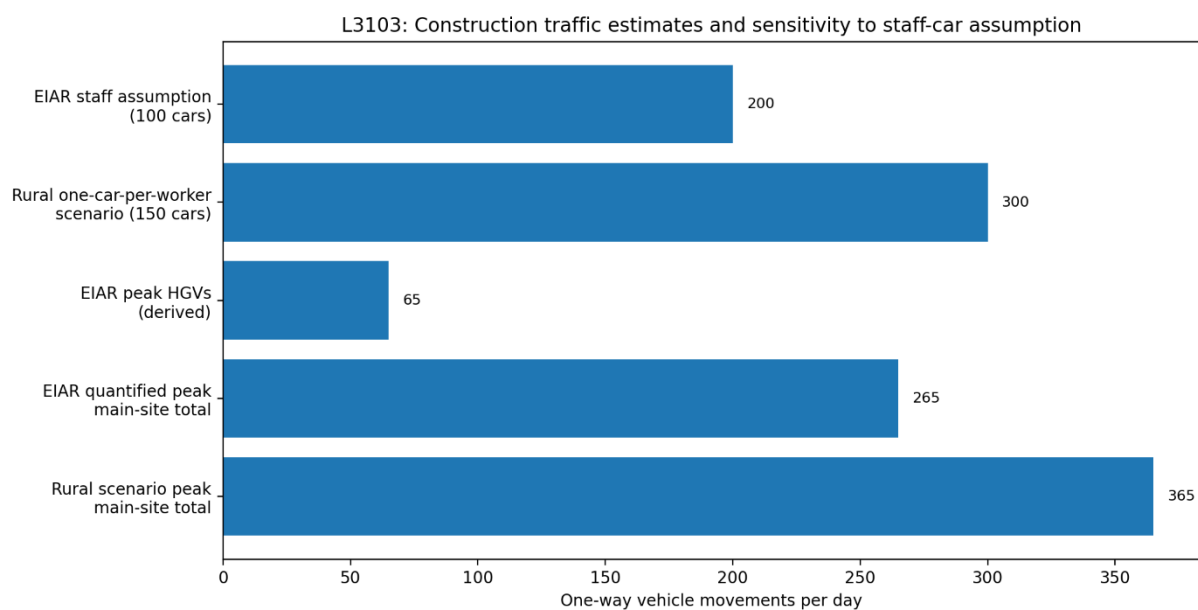
This is a low estimate for a rural construction site. The EIAR itself acknowledges that the local network lacks pedestrian and cycling infrastructure and therefore assumes that all trips are car-based. In such a rural working location, it is reasonably foreseeable that each worker may use their own transport, particularly where workers may arrive from different directions, at different times, with different tools, PPE, work schedules, subcontractor obligations, and onward journeys. If 150 workers each arrive by individual car, the staff-car figure becomes 150 arrivals and 150 departures, or 300 one-way staff vehicle movements per day. That is 100 additional one-way movements per day over the EIAR staff-car assumption, a 50% increase in staff-related movements.

The EIAR assumption is therefore not a robust worst-case assessment. It is an optimistic assumption about car-sharing or vehicle occupancy, unsupported by a binding construction worker travel plan, shuttle plan, or enforceable parking management plan. A more precautionary assessment should have modelled a one-car-per-worker scenario, particularly given the rural location and absence of realistic walking, cycling or public transport alternatives.

5.3 Sensitivity calculation: EIAR staff assumption versus one-car-per-worker scenario

Scenario	Cars / vehicles	One-way movements per day	Comment
EIAR staff-car assumption	100 cars	200	100 arrivals + 100 departures.
Rural one-car-per-worker scenario	150 cars	300	150 arrivals + 150 departures.
Increase not assessed in EIAR	+50 cars	+100 movements/day	Additional staff traffic if each worker drives.
EIAR peak HGV estimate, derived from PCU values	Approx. 65 HGV movements/day	Approx. 65	Approximate conversion from EIAR PCU values.
EIAR quantified peak main-site total	Staff + HGV	Approx. 265	Does not include all specialist or unquantified movements.
Rural sensitivity total	Staff + HGV	Approx. 365	Shows scale if each worker uses own vehicle.

Figure 1. L3103 construction traffic sensitivity: EIAR estimate compared with rural one-car-per-worker scenario.



Notes: one arrival = one movement; one departure = one movement. HGV count is approximate, derived from EIAR PCU values. UGC cable works, HDD, resurfacing, traffic management and cable-drum deliveries are not fully quantified in the EIAR.

5.4 Heavy vehicle figures are estimates and do not capture the full construction burden

For earthworks, the EIAR estimates 13,000 m³ of material. Assuming a density of 2 tonnes/m³, this gives 26,000 tonnes. At 20 tonnes per trailer, the EIAR identifies 1,300 vehicle trips over the earthworks period. If return journeys are included, this is approximately 2,600 one-way HGV movements for earthworks haulage alone.

Chapter 10 then distributes heavy vehicle activity across the construction period using assumptions about work hours, uniform haulage and PCU conversion. These figures are estimates, not measured commitments. They depend on even distribution of haulage, assumptions about working hours, assumptions about return journeys, assumptions about PCU conversion, and assumptions about abnormal-load timing. They do not provide a reliable worst-case day for the local community if several construction activities coincide or if construction sequencing changes.

The figures also do not adequately capture the practical burden on the L3103 as a busy local route into Athenry. Even if the theoretical road capacity is not exceeded, the additional traffic will include construction workers, vans, HGVs, abnormal loads, delivery vehicles, shuttle vehicles, and traffic-management vehicles. These will interact with existing residents, local farming activity, school and commuter movements, and other local development traffic. The environmental issue is not simply whether the L3103 can theoretically carry 1,500 vehicles per hour; it is whether the development imposes an avoidable and disproportionate burden on a rural road serving a local community.

5.5 UGC worker parking and shuttle arrangements are not sufficiently specified

With regard to the cable connection phase to Cashla, the EIAR states that all parking during the construction period will be provided on the Cashla Peaker Plant/AGI site within the site compound, that no additional parking is to be provided, and that UGC installation will be

facilitated via a shuttle service for all operatives. The EIAR also states that only vehicles directly required to complete the cable installation works will be allowed on site due to constrained space, and that access for personnel will be provided by shuttle between the Peaker Plant/AGI site and the cable works area.

This is not sufficient. The EIAR does not state how many UGC operatives will be involved, how many shuttles will operate, the vehicle type or capacity of the shuttle, the frequency of shuttle movements, whether the shuttle will travel along the L3103 to and from Athenry, where operatives will park within the compound, whether parking capacity is adequate for both main-site and UGC operatives at overlapping stages, where shuttle turning and set-down points will be located, or how shuttle movements will interact with road closures, stop/go traffic management, HDD works, deliveries and local access.

This omission is particularly serious because Chapter 10 describes the cable installation as involving up to 10 electrical/civil crews, excavators, 360-degree tracked excavators, tracked dumpers, tractors and trailers, a crane, hoist, power tools, generator, scaffolding, and substation electrical equipment. The EIAR then concludes that these activities are anticipated to generate small volumes of traffic and that the impact is negligible and short-term. That conclusion is unsupported because the EIAR does not quantify the cable-related vehicle movements.

5.6 Cable-route traffic is seriously underestimated

The 8.1 km underground grid connection is one of the most traffic-disruptive elements of the whole project. It requires works along the L3103, L7108, and L7109, full road closures on L7108 and L7109 due to limited road width, partial closures and stop/go arrangements on the L3103, full-width resurfacing, and three HDD motorway crossings. Yet the traffic analysis does not give a total number of cable-drum deliveries, duct deliveries, concrete deliveries, bedding/backfill deliveries, spoil-removal trips, road-planing vehicles, resurfacing vehicles,

roller/compactor movements, HDD rig deliveries, water tanker trips, drilling-fluid/bentonite deliveries or removals, traffic-management vehicle movements, or shuttle movements.

A conclusion that UGC traffic is negligible is not reasonable, where the same EIAR identifies long-duration road closures and diversion routes. The cable works cannot be treated as a minor construction side issue. They are essential enabling infrastructure for the peaker plant and will affect public roads and local residents over a much greater linear distance than the main site itself.

5.7 Long-duration road closures and diversions

Chapter 2 states that main cable construction will last 6 months in total: 1 month on the L3103, 3 months on Lisheenkyle East / L7108, and 2 months on the L7109. Resurfacing is stated as 4 months in total: 3 weeks on the L3103, 2 months on L7108, and 1.5 months on L7109. Chapter 10 gives 2 weeks rather than 3 weeks for L3103 resurfacing, which is an internal discrepancy. In either case, the road-disturbance period is substantial.

The EIAR also states that due to limited road width along L7108 and L7109, full road closures will be required. It identifies approximately 3 km closures on both roads, an approximately 8 km diversion route, and approximately 5 km of additional travel. This is not a negligible impact for local residents, farmers, school traffic, deliveries, visitors, emergency access, carers, and businesses.

5.8 Road disturbance duration from EIAR

Road	Main cable construction	Resurfacing	Total disturbance
L3103	1 month	3 weeks in Chapter 2 / 2 weeks in Chapter 10	Approx. 1.5 to 1.75 months
Lisheenkyle East / L7108	3 months	2 months	5 months
L7109	2 months	1.5 months	3.5 months

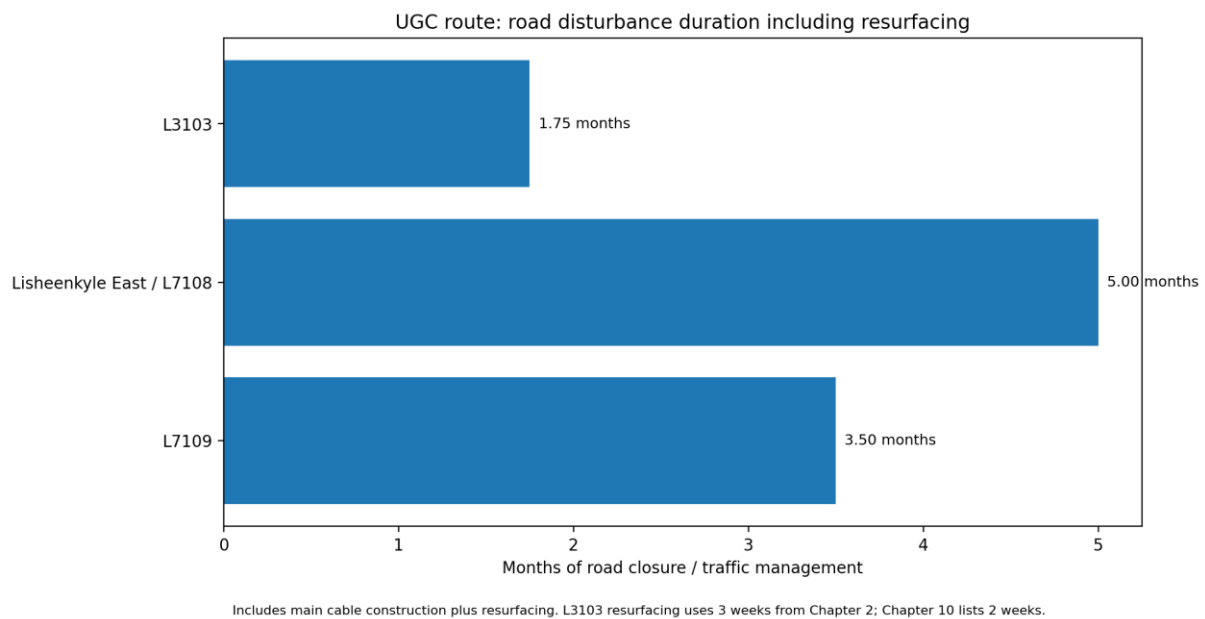


Figure 2. Duration of UGC road disturbance including resurfacing, based on EIAR Chapter 2 and Chapter 10 figures.

5.9 Cumulative effects with Gannow Wind Farm and other local projects

The EIAR itself identifies Gannow Wind Farm, planning reference 25/61412 / ACP PL07.500493, as a relevant cumulative project. It describes that project as involving 8 wind turbines and 38 kV grid infrastructure, including a substation and underground grid connection. It also states that the proposed Gannow grid connection includes a 2.2 km section of road common to both the Gannow Wind Farm and the Cashla Peaker Project, along the L7108 and L7109.

The EIAR states that, taking a precautionary approach, Gannow has been assessed cumulatively. It further states that the cumulative construction activities would result in short-term significant impacts on the local road network, specifically along L7108 and L7109, due to full road closures during grid-connection works. It identifies up to 7 months combined impact for main cable construction and approximately 4 months for resurfacing.

This is important. Even on the applicant's own cumulative assessment, the overlapping grid-connection works may create significant impacts on the local road network. The EIAR

attempts to reduce this concern by referring to the current viability and planning status of the Gannow connection, but it also accepts that the schemes can interact and that the shared road section can be affected. The Commission should therefore require a precautionary and enforceable sequencing condition preventing overlapping road closures and grid-connection works, and should not accept a conclusion of negligible cable-route traffic impact.

Other local developments also have the potential to add traffic pressure in the wider area, including energy infrastructure, industrial/employment development and local road-access proposals identified in the cumulative assessment. The question is not whether each project in isolation appears manageable, but whether the combined burden on the local road network and residents has been properly assessed.

5.10 Project splitting has contributed to inadequate scoping of the traffic effects

This traffic issue is an example of the practical harm caused by project splitting. The peaker plant and the 220 kV grid connection are legally filed as separate applications, but they are functionally interdependent. The peaker plant cannot fulfil its purpose without the grid connection to Cashla substation. The traffic impact of the cable route must therefore be scoped and assessed as a core project impact, not as a secondary or incidental matter.

The EIAR gives more detailed numerical treatment to the main-site construction traffic than it gives to the cable route. The result is an imbalance in the assessment. The grid connection, despite being approximately 8.1 km long and mainly within public roads, is not supported by a complete vehicle-movement count. This under-scoping allows the most geographically extensive and locally disruptive part of the project to be treated as negligible, even while the EIAR acknowledges full closures, diversions, resurfacing and HDD works.

The Commission should not permit the separate application structure to dilute the environmental assessment. For EIA purposes, the Commission must assess the project as a

whole and must require a complete and transparent construction traffic assessment for both the main site and the grid connection.

5.11 Requested findings and requirements

- Require a revised construction traffic assessment for the L3103, L7108, L7109 and L71093, including both main-site and UGC works.
- Require a one-car-per-worker sensitivity scenario for the main-site construction workforce.
- Require a complete UGC vehicle-movement schedule, including cable drums, ducts, excavation plant, HDD equipment, drilling materials, backfill, spoil removal, resurfacing, traffic management, and shuttle movements.
- Require a detailed construction worker parking and shuttle plan, including shuttle route, frequency, set-down points, parking numbers, and interaction with road closures.
- Require cumulative sequencing controls with Gannow Wind Farm and other local infrastructure works to prevent overlapping closures and construction traffic peaks.
- Require a road-condition survey, road-maintenance bond, and reinstatement monitoring for all affected local roads.
- Require emergency-access protocols for residents, farms, carers, school transport, and emergency services during full and partial closures.
- Require the traffic assessment to be revised on the basis that the grid connection is essential enabling infrastructure and not an incidental or separate minor project component.

5.12 Source Notes for Verification

EIAR Volume 2, Chapter 1 and Chapter 10: site approximately 2 km west of Athenry; access via new 1.15 km road to L3103; grid route approximately 8.1 km along L7109, L71093, L7108 and L3103.

EIAR Volume 2, Chapter 10: peak construction workforce of up to 150 workers; assumed car ownership rate of 1.5; approximately 100 car trips; Table 10-2 staff trips by hour; earthworks haulage of 13,000 m³ / 26,000 tonnes / 1,300 trips.

EIAR Volume 2, Chapter 2: all construction parking on Cashla Peaker Plant/AGI compound; no additional parking; UGC operatives to be facilitated by shuttle service.

EIAR Volume 2, Chapter 2 and Chapter 10: UGC works on L3103, L7108, and L7109; closure durations and resurfacing durations; full closures on L7108 and L7109; approximately 8 km diversion adding approximately 5 km travel.

EIAR Volume 2, Chapter 16: Gannow Wind Farm common 2.2 km road section; cumulative construction impacts on L7108 and L7109; main cable construction up to 7 months and resurfacing approximately 4 months in cumulative scenario.

ACP case page PL07.500493 / Galway County Council 25/61412: Gannow Wind Farm planning appeal for 8 turbines with EIAR and NIS.

Chapter 6: Defective Ecological and Appropriate Assessment Scoping of the Underground Cable Route

6.1 Opening Statement

The proposed 220 kV underground cable route has not been assessed to the same ecological standard as the proposed peaker plant site. The underground cable route is approximately 8.1 km long, follows the L3103, L7108, L71093, and L7109 local roads, passes numerous trees, hedges, groups of trees, and roadside habitats, and requires Horizontal Directional Drilling (HDD) crossings beneath the M6 and M17 motorways. It is not a minor ancillary element. It is essential enabling infrastructure without which the proposed peaker plant cannot export electricity to Cashla substation.

The application documents treat the cable route primarily as an engineering corridor within the public road. That approach understates the ecological importance of the route. The route is a long linear construction project through a rural landscape containing hedgerows, stone walls, roadside verges, tree groups, woodland edges, underground services, road drainage features, karst groundwater vulnerability and HDD work areas. These are all potential ecological receptors or ecological pathways. They required a route-specific ecological, hydrological and hydrogeological assessment before consent, not merely an arboricultural survey and contractor-led management after consent.

The weakness is not that no ecological work was carried out at all. Ecological work was carried out for the main site and access road. However, on the documents reviewed to date, the cable route appears to have been scoped and assessed to a materially lower standard than the main peaker plant site. This is precisely the type of assessment gap that can arise where a functionally integrated project is split into separate planning applications. The grid

connection becomes treated as secondary, despite being indispensable to the operation of the plant.

6.2 The Cable Route is Part of the Project and Must be Assessed as Such

The CEMP and EIAR describe the Proposed Project as including approximately 8.1 km of underground grid connection route from the proposed ESB substation at the peaker plant site to the existing Cashla 220 kV substation, along local roads including the L3103, L7108, L71093, and L7109. The same documents confirm that the route requires three HDD operations beneath the M6 and M17 motorways. The CEMP also acknowledges that, notwithstanding the dual consenting approach, the peaker plant and electricity transmission infrastructure form a single integrated project for the purpose of exporting electricity to the national grid.

The environmental implications of the grid connection cannot lawfully or practically be treated as an afterthought. The route is long, linear, construction-heavy, and environmentally sensitive. Its ecological effects are likely to arise during construction rather than operation: trenching, HDD launch and reception areas, joint bays, construction lighting, road closures, traffic, dust, noise, vibration, dewatering, sediment control, accidental pollution, vegetation clearance, root severance, invasive species spread, and disturbance to birds, bats and other fauna.

The Commission is therefore requested to assess the underground cable route as a major component of the overall development and to require the same level of ecological and Appropriate Assessment certainty for that route as would be required for the main generating site.

6.3 Evidence that the Route Contains Ecological Receptors

The Tree Survey Report is important because, although it is not an ecological survey, it

confirms that the cable route is not an ecologically empty road corridor. It records that the underground cable route passes numerous trees, hedges, and groups of trees between the main facility and Cashla substation. The report further states that the route follows the L3103 and then smaller country lanes to Cashla substation, passing a series of trees and hedges on both sides of the road. It identifies potential root spread under the road surface and recognises that significant root severance could negatively affect the health and stability of trees, potentially creating safety issues along the route.

The same Tree Survey Report records one woodland, one hedge, 13 tree groups, and 54 individual trees within its survey scope. It also identifies woodland W1, hedge H1, tree groups G6 to G13, and trees T1 to T6 as features through or close to which the new cable connection will pass. The report therefore supports the concern that the cable route includes linear habitats, roadside trees, hedgerows, and woodland-edge features capable of supporting birds, bats, invertebrates, mammals, and ecological connectivity.

However, the Tree Survey Report is expressly an arboricultural assessment. It is not a botanical survey, zoological survey, bat survey, bird survey, hydrological survey, hydrogeological survey, invasive species survey, or Appropriate Assessment survey. Its own limitations state that the inspection was from ground level only, that trees on private property were not accessed directly, that inaccessible trees were assessed only from visible parts, and that trees and tree groups along the cable route were not plotted by topographic survey methods. That is not a sufficient evidential basis for a conclusion that the full 8.1 km route has no material ecological sensitivity.

6.4 Bird Survey Weakness: Main Site and Access Road, Not the Full Cable Route

The Breeding and Wintering Bird Survey Report states that the survey was undertaken for the Cashla Peaker Plant at Rathmorrissy and Pollnagroagh and that the survey extent was the

proposed peaker plant boundary and associated access route. It describes wintering and breeding bird surveys within the proposed peaker plant boundary and associated access road, based on two transect areas shown in Figure 1-2 of that report. Those transects do not appear to cover the full 8.1 km underground cable route to Cashla substation.

This is a serious limitation. The cable route is the element of the project that will disturb the longest length of roadside habitat. It passes hedges, trees, stone walls, verges, woodland groups, and rural lanes. These features are the kinds of habitats used by breeding birds, nesting birds, foraging birds and commuting wildlife. A bird survey focused on the main plant footprint and access road cannot be treated as a route-wide survey of the cable corridor. The EIAR mitigation states that vegetation clearance will be carried out outside the breeding bird season, from 1 March to 31 August inclusive. That commitment is welcome, but it does not cure the baseline defect. It confirms that nesting bird risk exists. It does not establish that the full route has been adequately surveyed or that the timing, sequencing, and location of works will avoid all disturbance to nesting birds along the route. A pre-construction check is not an adequate substitute for a proper baseline survey where the route itself is a major linear construction corridor.

6.5 Bats: The Cable Route Has Been Under-Assessed

The Bat Report appears focused on the proposed peaker plant site and the access route from the L3103. The bat specialist walked the site and access road, assessed the field boundaries, mature trees, and structures on or near the main site, and used static detectors on the site. The report did not, on the material reviewed, demonstrate a full bat activity survey, roost-potential survey, or commuting-corridor assessment along the entire 8.1 km underground cable route. The EIAR acknowledges that bats were recorded using the site and that bat activity was highest along the mature treeline at the north-western boundary. It also acknowledges that the loss of linear habitat such as hedgerow and stone wall could reduce bat connectivity and

would be a permanent significant negative impact at local scale in the absence of mitigation.

The EIAR further acknowledges that temporary lighting during construction can disturb bats and could have a significant negative local impact before mitigation.

The weakness is that the EIAR then treats the grid connection route as tarmac road with occasional grassy verges and states that these habitats are not suitable for foraging or commuting bats and that there are no mature trees within the route suitable for roosting bats.

This conclusion is difficult to reconcile with the Tree Survey Report, which records numerous trees, hedges, groups of trees, woodland W1, hedge H1, and roadside tree groups along the route. The relevant ecological question is not limited to the tarmac surface. It includes the adjacent hedgerows, tree lines, verges, walls, roots, compounds, HDD launch/receptor areas, temporary lighting zones, road closures, and works areas.

The Commission should therefore require a route-wide bat assessment covering commuting corridors, foraging areas, roost potential in roadside trees, potential lighting impacts at HDD compounds and joint bays, and the cumulative severance or disturbance effects of works along the route.

6.6 Botany, Zoology and Invasive Species: Lack of Route-Specific Assessment

The EIAR lists a habitat and plant survey, mammal survey, invasive species survey, and smooth newt survey at the Site. However, the documents reviewed do not demonstrate that the full 8.1 km cable route was subject to a route-wide botanical survey, zoological survey, invasive species survey, mammal survey, amphibian assessment, or hedgerow ecological assessment equivalent to the work carried out at the main site.

This matters because the cable route is a linear project. Linear works are particularly vulnerable to ecological effects that may be missed by a site-focused survey: invasive species spread between locations; disturbance of roadside mammal use; destruction of nesting

habitat; severance or weakening of tree roots; accidental pollution via drains, culverts, or karst pathways; and cumulative disturbance of hedgerows and verges over several kilometres. The CEMP requires the contractor to prepare an Invasive Species Action Plan and to inspect and clean plant and machinery to prevent spread of species such as Japanese knotweed and Himalayan balsam. Those measures are useful, but they do not replace the need for a route-specific invasive species baseline before consent. A contractor cannot manage or avoid what has not been properly mapped.

6.7 Hydrology, Hydrogeology and AA Pathways

The ecological concerns are inseparable from hydrology and hydrogeology. The EIAR identifies hydrogeological connectivity through groundwater and karst as a potential pathway to European sites, including Galway Bay Complex SAC, Cregganna Marsh SPA, and Inner Galway Bay SPA. It also recognises a groundwater-dependent terrestrial ecosystem associated with the Galway Bay Complex and states that parts of the project area are extremely vulnerable to groundwater contamination.

The route includes trenching, joint bays, HDD launch and reception areas, possible dewatering, existing service crossings, water-main interactions, and works in a karst-influenced limestone landscape. It is not enough to rely on general pollution prevention controls, especially where groundwater pathways have been screened into Stage 2

Appropriate Assessment.

The AA/NIS conclusion must be based on complete, precise, and definitive findings capable of removing reasonable scientific doubt. If route-specific hydrological, hydrogeological, and ecological information is deferred to a contractor's future assessments, then the competent authority may not have the information required to make a lawful Appropriate Assessment before granting consent.

6.8 CEMP Deferral to Contractor: A Material Weakness

The Outline CEMP is one of the most important documents for understanding how ecological risk is intended to be managed during construction. It also exposes a significant weakness in the application. The CEMP repeatedly places the burden of environmental management on the future contractor. It states that the works contractor will undertake the works in accordance with the CEMP, that the CEMP may be added to, and that it will be updated by the contractor to address planning conditions. It also states that contractors will develop, implement, and maintain an Ecology Management Plan.

This approach is not inherently objectionable for routine construction control. However, it becomes problematic where baseline ecological information is incomplete and where the future contractor is being asked to identify, evaluate, and manage ecological risk that should have been fully scoped before consent. Environmental management cannot be used to fill gaps in the assessment needed by the Commission to decide whether the project is acceptable in the first place.

The CEMP states that, before site clearance or construction, a walkover survey will be carried out by a suitably qualified ecologist appointed by the Contractor. It also states that pre-construction surveys are intended to ensure there has been no change between the planning application and the start of construction. This is too narrow. If the full cable route was not adequately surveyed in the first instance, a future contractor-appointed walkover is not merely checking for change. It becomes the first meaningful route-specific ecological survey. That is not an appropriate post-consent function.

6.9 Insufficient Governance: ECoW and Environmental Manager Roles are TBC

It is acknowledged that the CEMP does refer to an Environmental Manager and an Ecological Clerk of Works (ECoW). However, the governance is not sufficiently certain for a project of this scale and sensitivity. In the CEMP roles table, key roles including the Contractor,

Environmental Manager, and ECoW are marked TBC. The CEMP states that the Environmental Manager will be appointed by the contractor and that the ECoW will monitor successful implementation of construction-phase mitigation measures at frequencies set out in the CEMP. The Construction Methodology Report states that method statements will be overseen by the Project Manager, Environmental Manager, and ECoW where relevant. The phrase "where relevant" is too weak for an 8.1 km cable route crossing rural roads, hedgerows, trees, HDD sections, and karst-influenced groundwater pathways. The application does not provide a sufficiently clear ecological governance pathway for the cable route. It does not identify the ECoW's minimum qualifications, independence, reporting line, site presence, inspection frequency at each route section, authority to stop works, sign-off requirements before trenching or HDD, or escalation procedure to NPWS, Galway County Council, An Coimisiún Pleanála, or Uisce Eireann if ecological or water risks arise. This is a material risk. It assumes expert ecological risk management by a future contractor and shifts the weight of environmental protection onto that contractor after consent. A contractor is appointed to deliver the works. Unless the planning permission contains strict and enforceable ecological governance requirements, there is a risk that cost, programme pressure and construction practicality will override ecological caution. The CEMP should therefore not be accepted as adequate unless it is revised to require a named, independent, suitably qualified ECoW, appointed before any enabling works, with authority to stop works, approve method statements, sign off route sections, approve HDD environmental controls, review lighting plans, supervise vegetation clearance, inspect nesting bird risk, inspect bat-sensitive features, monitor water and sediment controls, maintain a written compliance log, and report directly to the applicant and relevant authorities.

6.10 Seasonal Restrictions: Nesting Birds and Hedgerows

Works along hedgerows, trees, verges, and stone walls should not be carried out during the bird nesting season unless a suitably qualified ecologist has confirmed that no active nests or protected species will be disturbed and unless the works are clearly within any legal exemption. The Wildlife Act 1976 protects wild birds, nests, and eggs. NPWS guidance states that Section 40 prohibits cutting, grubbing, burning, or otherwise destroying vegetation on uncultivated land between 1 March and 31 August annually, subject to limited exemptions. NPWS also states that Section 22 makes it an offense to wilfully destroy, injure, or mutilate eggs or nests, or to disturb a wild bird on or near a nest containing eggs or unflown young, at any time of year.

The EIAR's commitment to avoid vegetation clearance during the 1 March to 31 August breeding bird season should be made an enforceable condition. It should apply to all route works affecting hedgerows, trees, scrub, verges, stone walls, and woodland-edge habitats, not merely to the main site. The condition should also prohibit works likely to disturb active nests, even outside that period, unless the ECoW has confirmed no active nests are present and recorded the basis for that conclusion.

6.11 Lighting and Night Works

The EIAR and CEMP state that no construction activities will take place after dark where possible and that directional lighting will be used where evening lighting is required. The words "where possible" are too uncertain. For bats, lighting is not a minor construction issue. The EIAR itself acknowledges that lighting can affect commuting and foraging bats and that temporary construction lighting may affect bats within the site.

For the cable route, the risk is wider than the main site. HDD compounds, joint bays, road closures and traffic-management areas may require lighting at or near roadside trees, hedges and commuting features. The application does not demonstrate a route-wide lighting

assessment for bats. A condition should prohibit night works and artificial lighting along the cable route unless the ECoW has approved a site-specific lighting plan demonstrating no disturbance to bat commuting or foraging routes.

6.12 Project Splitting and Under-Scoping

This ecological weakness is a practical example of the harm caused by the separate filing of the peaker plant and grid-connection elements. Although the EIAR states that the project has been assessed as a single combined project, the evidence suggests that the main plant site has received more detailed ecological survey attention than the cable route. The grid connection is functionally indispensable, yet it appears to have been scoped as a secondary engineering corridor rather than as a major ecological impact corridor.

The Commission should not allow the separate planning route for the section 182B electricity transmission infrastructure to result in a lower standard of ecological or Appropriate Assessment scrutiny. The grid connection must be assessed to the same standard as the peaker plant because the two are one overall project for EIA and AA purposes.

6.13 Potential JR-Relevant Defects

The following matters are potentially significant from a legal robustness perspective and should be considered carefully by the Commission:

- Inadequate route-specific ecological baseline for the full 8.1 km underground cable route.
- Apparent reliance on a tree survey as the principal route-specific field assessment, despite that survey being arboricultural only and subject to express limitations.
- Bird survey effort focused on the peaker plant boundary and access road rather than the entire cable route.
- Bat survey effort focused on the main site and access route, with no demonstrated route-wide bat activity, roost-potential, or commuting-corridor assessment.
- Over-reliance on future contractor-appointed pre-construction walkover surveys and

management plans.

- Absence of a sufficiently clear ECoW sign-off pathway, stop-work authority, inspection schedule, and reporting structure for the cable route.
- Uncertain wording such as "where possible" and "where relevant" in relation to lighting, construction activity, and ecological supervision.
- Insufficient integration of ecology with hydrology and hydrogeology, particularly where karst groundwater pathways and European sites have been screened into Stage 2 AA.
- Failure to ensure that nesting bird, bat, and hedgerow protections are applied explicitly to all route works, HDD compounds, joint bays, and temporary works areas.
- Project splitting resulting in the grid connection being under-scoped compared with the main peaker plant site.

6.14 Requested Findings and Conditions

The Commission is requested to find that the application is deficient unless the applicant provides, before any grant of permission, a full route-specific ecological and hydrogeological assessment of the 220 kV underground cable route. That assessment should include the following:

- A route-wide habitat and botanical survey, including hedgerows, verges, stone walls, woodland edges, joint bays, HDD launch/receptor areas, and temporary compounds.
- A route-wide breeding bird and nesting bird risk assessment, including hedgerows and roadside trees along L3103, L7108, L71093, and L7109.
- A route-wide bat assessment covering commuting corridors, foraging features, roost potential in mature trees, lighting risk, and HDD/work compound areas.
- A route-wide mammal, amphibian, and invasive species assessment, including roadside drains, culverts, ponds, and groundwater-linked receptors.
- A hydrogeological risk assessment of trenching, HDD, dewatering, bentonite use, accidental

spills, karst pathways, and groundwater-dependent ecological receptors.

- A cumulative and in-combination assessment of other local infrastructure works, including proposed wind farm grid works where routes overlap or works may be concurrent.
- A revised CEMP with mandatory ECoW governance, stop-work powers, route-section sign-off, inspection frequencies, reporting duties, and authority escalation procedures.

If permission is granted despite these concerns, the following minimum conditions should be imposed:

- No vegetation clearance or works affecting hedges, trees, scrub, walls, or verges during the 1 March to 31 August breeding bird season unless legally permissible and signed off by an independent ECoW after a recorded survey confirms no active nests or protected species will be disturbed.
- No night works or artificial lighting along the cable route unless an ECoW-approved lighting plan demonstrates no adverse disturbance to bats or other wildlife.
- No trenching, HDD, dewatering, joint bay excavation or vegetation clearance until the ECoW has signed off the relevant route section and the sign-off has been retained in a compliance register available to the planning authority and Commission.
- The ECoW must be independent, suitably qualified, named before commencement, present during ecologically sensitive works, empowered to stop works, and required to report material incidents to the applicant and relevant authorities.
- All HDD method statements must include ecological, hydrogeological and pollution-control sign-off before commencement, including bentonite breakout response, karst protocol, dewatering controls and emergency procedures.

6.15 Conclusion

The underground grid connection route is a major component of the project. It is the physical link that allows the peaker plant to export electricity to Cashla substation. It is long, rural,

linear, and environmentally sensitive. It passes trees, hedges, groups of trees, woodland-edge habitat, local roads, HDD sections, and karst-influenced groundwater pathways. The documentation reviewed to date does not demonstrate that the full route has been ecologically surveyed or assessed to the same standard as the main peaker plant site.

The reliance on future contractor surveys and contractor-prepared management plans is not adequate to fill this gap. The CEMP and Construction Methodology contain useful commitments, but they do not provide the level of pre-consent scientific certainty required for EIA and Appropriate Assessment. The Commission should require full route-specific ecological and hydrogeological assessment before deciding the application. In the absence of that information, there is reasonable doubt as to the adequacy of the AA/scoping process and the robustness of the conclusion that the project will not adversely affect ecological receptors or European sites.

6.16 Source Notes

This chapter is based on the following documents and guidance reviewed for the observation:

- Cashla Peaker Plant EIAR Volume 2, including Chapter 5 Biodiversity, Chapter 10 Traffic and Transportation, Chapter 11 Land, Soils and Geology, Chapter 12 Water, and relevant project description sections.
- Volume 3 Appendix 2.7, Construction Methodology Grid Connection Report, TLI, 2026.
- Volume 3 Appendix 2.10, Outline Construction Environmental Management Plan, AtkinsRealis, 2026.
- Volume 3 Appendix 5.1, Breeding and Wintering Bird Survey Report, Delichon Ecology, 2025.
- Volume 3 Appendix 5.2, Bat Report, Caroline Shiel, 2025.
- Volume 3 Appendix 5.3, Tree Survey Report, Independent Tree Surveys, 2025.
- NPWS guidance on restrictions on cutting hedgerows and burning under the Wildlife Act

1976.

- NPWS guidance on Appropriate Assessment for planning authorities and the European

Commission guidance on the Article 6 permitting procedure for Natura 2000 sites.

6.17 Appendix A: Evidence Summary

Issue	Evidence reviewed	Objection point
Scale of route	The CEMP/EIAR describe an approximately 8.1 km underground cable route along local roads with three HDD crossings under the M6 and M17.	The cable route is a major project element and requires route-specific assessment.
Bird survey scope	Bird surveys were described as within the peaker plant boundary and associated access road, with two transects shown in the main site/access area.	This does not demonstrate systematic breeding bird survey of the full cable route.
Bat survey scope	Bat report focused on the main site and access route; EIAR records six bat species and acknowledges local bat connectivity/light disturbance risks.	Full route-wide bat commuting, roost-potential and lighting assessment is needed.
Tree/hedgerow receptors	Tree Survey Report records numerous trees, hedges, groups and woodland features along the cable route, with potential root severance risk.	Route is not ecologically empty; arboricultural assessment is not a substitute for ecological baseline.
CEMP governance	Roles such as Contractor, EM and ECoW are TBC; Ecology Management Plan and pre-construction surveys are to be developed by contractor.	Key ecological control is deferred post-consent without sufficient route-specific sign-off pathway.
AA pathway	EIAR identifies hydrogeological pathway to Galway Bay Complex SAC, Cregganna Marsh SPA and Inner Galway Bay SPA through vulnerable groundwater.	AA conclusion requires scientific certainty before consent, not deferred contractor assessment.

Chapter 7: Inadequate Assessment of Nesting Birds, Hedgerows, Tree Removal and Landowner Permissions Along the Underground Cable Route

7.1 Introduction

This chapter follows on from Chapter 6 and expands on the birds and bats section, addressing a significant deficiency in the ecological and land-consent assessment of the proposed Cashla Peaker Plant underground cable route, particularly in these two areas.

The proposed project includes an approximately 8.1 km underground 220 kV grid connection from the proposed peaker plant to Cashla Substation. The applicant's own documentation confirms that the route passes numerous trees, hedges, tree groups and woodland features, and that certain trees, bushes and sections of hedge will be removed, coppiced, felled or otherwise affected by construction works. However, the ecology assessment and mitigation are not sufficiently route-specific in relation to nesting birds, roadside hedgerows, tree-nesting birds, ground-nesting birds, bat commuting habitat, landowner permissions, and the legal status of vegetation clearance.

The issue is not simply whether the EIAR contains a general statement that vegetation clearance will occur outside the breeding bird season. The issue is whether the applicant has properly assessed the full 8.1 km cable route, identified all trees and hedges that may be removed or disturbed, confirmed ownership and access rights, provided evidence of landowner consent where third-party land or private vegetation is affected, and set out enforceable legal and ecological safeguards for the full construction corridor.

7.2 Ecology Work Carried Out and Its Limitations

The Breeding and Wintering Bird Survey Report states that Delichon Ecology Ltd was commissioned to undertake wintering and breeding bird surveys for the Cashla Peaker Plant project. The report describes surveys of the proposed peaker plant boundary and associated

access road, using walkover surveys, field transects, field scanning, presence/absence surveys, and two transect areas. It states that the surveys were undertaken to assess wintering and breeding bird species within and in the vicinity of the project area. However, the survey description and figures indicate that the main survey focus was the peaker plant boundary and associated access route rather than a detailed route-specific assessment of the full 8.1 km underground cable route.

The EIAR states that breeding bird surveys were carried out in May and June 2025 and that mitigation will include vegetation clearance outside the breeding bird season. However, the documentation reviewed does not appear to include a detailed chainage-by-chainage nesting bird assessment for the full cable route. It does not clearly map all roadside hedgerows, woodland, scrub, tree groups, joint bay locations, HDD compounds, passing bays, sightline clearance areas, or temporary working areas against bird nesting constraints.

This is important because the Tree Survey Report confirms that the underground cable route passes numerous trees, hedges, and groups of trees between the main facility and Cashla Substation. It also records that trees along the public-road cable route were not plotted by topographic survey methods and that their positions on the survey drawings should be regarded as indicative only. This is a material limitation where the route may require trenching, root severance, vegetation clearance, sightline clearance, construction compounds, passing bays, access, fencing, and reinstatement works.

7.3 Conflict Between the “Road Habitat” Assumption and Actual Linear Habitat Along the Route

A central weakness is that the project documentation appears to treat the cable route as if it is primarily a tarmac-road environment with limited bird habitat value. This is not a safe ecological assumption. Roadside hedgerows, mature trees, scrub, stone walls and wooded edges are recognised ecological corridors and nesting habitat for many common and protected

bird species. They also provide commuting and foraging habitat for bats and other wildlife.

The Tree Survey Report directly contradicts any simplistic assumption that the cable route is ecologically insignificant because it follows roads. The report states that the route of the proposed underground cable passes numerous trees, hedges, and groups of trees. It further identifies tree groups G6-G13, woodland W1, hedge H1, and trees T1-T6 along the route, with the cable running through or close to nominal Root Protection Areas. The report also states that the trees and hedges around the proposed development and along the cable connector route may be vulnerable to construction damage unless the works are well planned and managed.

This means the route is not merely a road corridor. It is a linear ecological corridor with tree, hedge and woodland features that may support nesting birds and other protected species. The EIAR should therefore have provided a dedicated cable-route nesting bird and hedgerow assessment, rather than relying on general vegetation-clearance mitigation.

7.4 Vegetation Removal Identified in the Project Documents

The Tree Survey Report identifies specific vegetation removal and tree works to facilitate the development. These include removal of a 15 m section of group G2, approximately 45 bushes in group G4, the removal of the small trees and bushes labelled G5, including trees T667, T668, T669, and T670, and possible removal of an ash sapling and two small hawthorn bushes on the roadside west of the new junction with the L3103 if required for sightlines. It also recommends that certain ash trees affected by ash dieback or structural defects be coppiced or felled as part of the enabling works.

These works are not ecologically neutral. Hawthorn bushes, hedgerows, ash trees, scrub, and roadside vegetation may provide nesting habitat for passerines and other birds. Even where trees are of low arboricultural value, they may have ecological value as nesting, roosting, foraging, or commuting habitat. The removal of vegetation to facilitate an industrial energy project must therefore be assessed against wildlife legislation, the Birds Directive, the Habitats

Directive, the Wildlife Acts, the EIA Directive, and any relevant local planning controls.

7.5 Nesting Bird Season and Section 40 of the Wildlife Act

The EIAR states that all vegetation clearance will be carried out outside the breeding bird season, which it identifies as 1 March to 31 August inclusive. This aligns with the statutory vegetation-cutting restriction under Section 40 of the Wildlife Act 1976, as amended, which prohibits the cutting, grubbing, burning, or other destruction of vegetation growing on uncultivated land between 1 March and 31 August annually, subject to limited statutory exemptions. The National Parks and Wildlife Service explains that this restriction exists to protect bird life during the nesting season and to protect vegetation and wildlife habitats during the months of growth and reproduction.

However, the EIAR's mitigation remains too general. It does not identify exactly which hedges, trees, bushes, scrub, or roadside vegetation will be removed along the full cable route. It does not provide a route-specific programme showing that all vegetation clearance, sightline clearance and enabling works can be completed outside the restricted period. It does not clearly distinguish between vegetation within the applicant's lands, public-road verges, third-party lands, boundary hedges, and private property. It also does not provide a clear pre-works nesting bird check protocol for each section of the cable route.

A general commitment to avoid vegetation clearance during 1 March to 31 August does not, on its own, adequately assess or mitigate the risk to nesting birds along an 8.1 km route. This is particularly so where the exact location of roadside trees and hedges is described as indicative only, and where final construction methodology, passing bays, temporary working areas, traffic management, and land access arrangements may be left to later contractor design.

7.6 Birds Directive and Protection of Nests, Eggs and Breeding Birds

Directive 2009/147/EC on the conservation of wild birds, commonly known as the Birds

Directive, requires Member States to protect naturally occurring wild birds. Article 5 requires protection against deliberate killing or capture, deliberate destruction of or damage to nests and eggs, removal of nests, and deliberate disturbance particularly during breeding and rearing where this would be significant. The European Commission describes these protections as applying to deliberate killing or capture, destruction or damage to nests or eggs, taking eggs, and deliberate significant disturbance during breeding and rearing.

The proposed cable route passes through or beside vegetation capable of supporting nesting birds. Therefore, the assessment should not merely state that clearance will occur outside the breeding season. It should demonstrate how the applicant will avoid destruction of nests, damage to eggs, disturbance of breeding birds, and loss of active nesting habitat along the full route. This should include mapped vegetation constraints, pre-commencement surveys, stop-work procedures, ecological supervision, contractor training, and clear reporting obligations.

7.7 Habitats Directive, Bats and Linear Hedgerow Habitat

The Habitats Directive (Directive 92/43/EEC) is also relevant because hedgerows, tree lines and woodland edges may provide commuting, foraging and roosting opportunities for bat species. Bats are strictly protected Annex IV species. Articles 12 to 16 of the Habitats Directive require Member States to establish a system of strict protection for Annex IV species across their natural range, including outside designated European sites. In Ireland, the Habitats Directive is transposed through the European Communities (Birds and Natural Habitats) Regulations 2011, as amended.

The EIAR acknowledges bats and proposes lighting mitigation, including directional lighting away from treelines and hedgerows. However, the Tree Survey Report confirms that the cable route passes numerous trees, hedges, tree groups, and woodland. Any root severance, hedge removal, tree removal, night working, lighting, trenching, road-edge disturbance, or severance of commuting routes may have ecological implications. The applicant should therefore be

required to provide a route-specific assessment of how hedgerow and tree works along the full cable route may affect bats and other protected species, and whether any derogation licence or further assessment is required before works commence.

7.8 Landowner Permission, Wayleaves and Third-Party Vegetation

There is also a significant land-consent issue. The Tree Survey Report states that trees on private property were not accessed directly and that trees rendered inaccessible by undergrowth, fences, or walls were assessed only from what was visible. It also states that trees along the public-road cable route were not plotted by topographic survey methods and that their positions should be regarded as indicative. This indicates that some relevant trees, hedges, woodland features, or roots may be located on, or partly on, private lands or boundaries adjoining the public road.

The EIAR acknowledges, in relation to public roads versus third-party lands, that EirGrid prefers to install underground cables within the existing public road network where possible, but that where third-party land is used, for example, for storing materials and equipment, relevant permission would need to be obtained from the landowner. It also refers to easements and wayleaves. This is an important admission. However, the documents reviewed do not appear to exhibit signed landowner permissions for the removal, cutting, coppicing, felling, root pruning, storage of materials, use of passing bays, temporary occupation, access, or disturbance of privately owned trees, hedges, or boundary vegetation along the cable route.

This does not mean that such permissions cannot be obtained in the future. However, it is a deficiency at assessment stage if the EIAR relies on removal or alteration of trees and hedges without clearly identifying ownership, consent, legal authority, access rights and ecological constraints. A planning permission, if granted, would not of itself authorise entry onto third-party lands or removal of another person's trees or hedges. The Planning and Development Regulations 2001 require planning applications to state the applicant's legal interest in the land

or structure and, if the applicant is not the owner, to state the name and address of the owner. Planning guidance and standard application practice also recognise that where an applicant is not the owner, written owner consent is normally required or expected for the application or works concerned.

In this case, the relevant question is whether the applicant has clearly demonstrated legal authority for all vegetation removal, root disturbance, and temporary occupation necessary along the cable route. The documents reviewed do not appear to show signed landowner consent for each affected hedge, tree group, roadside boundary, third-party working area, passing bay, storage area or access area. This should be clarified before any decision is made.

7.9 Local Planning Controls, Tree Preservation and Roadside By-Laws

Further controls may also apply at local level. Tree Preservation Orders, County Development Plan policies, biodiversity policies, roadside verge management requirements, road opening licences, hedge protection policies and local authority conditions may restrict the removal or alteration of trees and hedges. The applicant should be required to confirm whether any trees, hedges, demesne features, stone walls, roadside boundaries, or woodland features along the cable route are subject to any Tree Preservation Order, local heritage designation, biodiversity objective, roadside protection policy, or other by-law or consent requirement.

This is particularly important because the cable route passes through an area with historic roadside and estate landscape context, including the Castlelambert area and L3103 road corridor previously discussed. Even where features are not formally protected structures, hedgerows, stone walls, roadside trees, and demesne-related boundaries may have ecological, landscape, and cultural heritage value. The EIAR should therefore provide a joined-up assessment of vegetation clearance, ecology, land ownership, heritage context, and road-opening requirements.

7.10 Deficiencies in the EIAR and Supporting Documents

The deficiencies may be summarised as follows:

- The breeding and wintering bird survey appears to focus primarily on the peaker plant boundary and access road, rather than providing a detailed route-specific assessment of the full 8.1 km cable route.
- The Tree Survey Report confirms numerous trees, hedges, tree groups, and woodland features along the cable route, but some positions are indicative only, and trees on private property were not accessed directly.
- The EIAR relies on a general mitigation measure that vegetation clearance will take place outside the breeding bird season, but does not provide a detailed route-specific nesting bird method statement.
- The documentation identifies vegetation removal and possible sightline clearance but does not clearly demonstrate landowner consent or legal authority for all affected vegetation.
- The EIAR acknowledges that permission would be required where third-party land is used, but the reviewed documents do not exhibit signed landowner permissions for vegetation clearance, storage, access, passing bays or works affecting private trees or hedges.
- The assessment does not sufficiently integrate the Birds Directive, Habitats Directive, Wildlife Act restrictions, bat protection, tree root protection, local road controls, and landowner consent issues into one enforceable construction-phase framework.

7.11 Required Further Information

An Coimisiún Pleanála should require the applicant to provide the following before any decision is made:

- A full route-specific nesting bird assessment for the 8.1 km underground cable route, including all hedges, trees, scrub, woodland, stone walls, road verges, joint bays, HDD compounds, passing bays, and temporary working areas.

- A mapped schedule of all vegetation to be removed, cut back, coppiced, felled, root-pruned or otherwise affected, including chainage, ownership status, ecological value, and timing of works.
- A clear legal commitment that no vegetation clearance will occur between 1 March and 31 August unless lawfully exempt, ecologically justified, and subject to pre-works inspection and approval by a qualified ecologist.
- A pre-works nesting bird survey protocol for each work section, with stop-work procedures where active nests are found and buffer zones until young birds have fledged.
- A bat and hedgerow commuting-route assessment for all affected trees, hedges, and linear features along the route.
- Evidence of landowner permission, wayleave, easement, licence or other lawful authority for any works affecting third-party lands, private trees, boundary hedges, roots, storage areas, passing bays or temporary access areas.
- Confirmation from Galway County Council regarding road opening licences, verge works, passing bays, tree and hedge removal in public roads, local biodiversity policy, and any Tree Preservation Orders or local restrictions.
- A single enforceable Ecological Clerk of Works protocol covering the entire cable route, not merely the main peaker plant site.

7.12 Objection

It is feasible to object to the adequacy of the ecological and land-consent assessment for the proposed underground grid connection. The Tree Survey Report confirms that the cable route passes numerous trees, hedges, tree groups, and woodland features between the main facility and Cashla Substation, including tree groups G6-G13, woodland W1, hedge H1, and trees T1-T6. It also confirms that trees on private property were not accessed directly and that trees along the public-road route were not plotted by topographic survey methods, so their positions

are indicative only. The EIAR nevertheless relies on a general statement that vegetation clearance will occur outside the breeding bird season. This is insufficient for an 8.1 km cable route with multiple roadside hedges, trees, woodland edges, joint bays, HDD areas, road verges, and possible sightline works.

The Board should require a full route-specific nesting bird, hedgerow, tree, bat, and landowner-consent assessment before permission is considered. This should identify all vegetation to be removed or affected, confirm ownership and written consent, prohibit clearance during the statutory bird nesting period from 1 March to 31 August unless lawfully justified, require pre-works nesting bird checks and stop-work procedures, and ensure compliance with the Birds Directive, Habitats Directive, Wildlife Acts, European Communities (Birds and Natural Habitats) Regulations, EIA requirements, Planning and Development Regulations, local road controls, Tree Preservation Orders and relevant Galway County Council policies.

7.13 Conclusion

The EIAR and supporting appendices do not adequately assess the ecological and legal implications of vegetation clearance along the full underground cable route. The project documentation confirms that trees, hedges, woodland, and roadside vegetation are present along the route and that some vegetation will be removed or may be affected by trenching and construction. However, the assessment does not provide a sufficiently detailed, route-specific nesting bird, hedgerow, bat, tree-root, or landowner-consent analysis. In the absence of such information, the public and the Board cannot be satisfied that the proposed works comply with the relevant environmental legislation or that all required permissions and safeguards are in place.

7.14 References

- Cashla Peaker Plant EIAR, Volume 2, Chapter 5 Biodiversity and Chapter 16 Cumulative Impacts.

- Cashla Peaker Plant EIAR, Volume 1 Non-Technical Summary, Biodiversity section.
- Appendix 5.1 Breeding and Wintering Bird Survey Report, Delichon Ecology, 2025.
- Appendix 5.3 Tree Survey Report, Independent Tree Surveys Ltd, October 2025.
- Appendix 16.2 Technical Note - Gannow Wind Farm Grid Connection Review, TLI, 2026.
- Wildlife Act 1976, as amended, Section 40; National Parks and Wildlife Service guidance on restrictions on cutting hedgerows and burning.
- Directive 2009/147/EC on the conservation of wild birds (Birds Directive), Article 5.
- Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (Habitats Directive), Articles 12 to 16.
- European Communities (Birds and Natural Habitats) Regulations 2011, as amended.
- Planning and Development Regulations 2001, as amended, including requirements to identify the applicant's legal interest in land and owner details where applicable.

Chapter 8: Inconsistent Assessment of Castletambert Bridge, Road Infrastructure and Associated Heritage Context

8.1 Introduction

A significant inconsistency arises in the Environmental Impact Assessment Report (EIAR) and supporting appendices in relation to the assessment of Castletambert Bridge / Castletambert Overbridge and the associated L3103 road corridor. The project documentation recognises the structural limitations of Castletambert Overbridge for abnormal-load purposes, yet does not appear to apply the same level of caution or assessment to the proposed permanent 220 kV underground cable infrastructure and associated works in close proximity to Castletambert Bridge.

This inconsistency is material because the proposed development is not limited to a peaker plant site. It also includes an approximately 8.1 km underground grid connection, significant public-road works, joint bays, chambers, horizontal directional drilling (HDD) works, traffic management, and future maintenance requirements. The L3103 / Castletambert area is therefore not merely a passing location: it forms part of the permanent infrastructure corridor required to connect the proposed peaker plant to Cashla 220 kV Substation.

8.2 Structural Constraint Identified for Abnormal Loads

The EIAR and Civil Engineering Report demonstrate that the applicant assessed bridges and structures for the purpose of transporting extraordinary abnormal loads to the proposed site. In that context, Castletambert Overbridge, identified as structure DC-M17-005.00, was found to be unsuitable for the proposed 350-tonne abnormal-load route. The EIAR states that the load effects of the exceptional abnormal-load vehicle were less than the design load effects for each structure assessed, apart from DC-M17-005.00, and that the red route was therefore not adequate for the transfer of 350-tonne equipment.

The Civil Engineering Report similarly states that one structure on the red route, Castlelambert Overbridge, failed because it was overstressed under the proposed loads, and that the red route was unsuitable. This is important because the applicant's own documentation accepts that Castlelambert Overbridge is a structurally sensitive constraint in the project area. However, the implications of that sensitivity do not appear to have been carried through consistently into the assessment of the underground grid connection works.

8.3 Proposed 220 kV Cable Infrastructure at Castlelambert Bridge

The EIAR confirms that the underground grid connection will travel through the L7108 and L3103 road network in the Castlelambert area. It states that the underground grid connection route encounters the junction for the L3103 in Castlelambert, continues eastward within the public road curtilage, then leaves the public road before encountering the motorway asset and requiring the third HDD crossing. It also confirms that Joint Bay 08 is to be located in close proximity east of the identified HDD receptor area infrastructure within the publicly owned area at Castlelambert Bridge on the L3103, at chainage 5840 m.

The Construction Grid Connection Report repeats this point and states that Joint Bay 08 will be located close to the HDD receptor area at Castlelambert Bridge. It also states that preliminary site investigations along the cable route will be required before construction to confirm design assumptions, and that crossing schedules for services will be prepared at detailed design stage.

This creates a clear inconsistency. For abnormal loads, the bridge is assessed as a structural constraint significant enough to reject a route. For the permanent grid connection, however, the documentation appears to rely on later detailed design, further site investigation, and future crossing schedules, rather than providing a bridge-specific assessment at this stage.

8.4 Lack of Equivalent Civil Engineering Assessment for Permanent Cable Works

The project documentation therefore appears to apply two different standards of assessment.

First, when the issue is the movement of heavy equipment, Castlelambert Overbridge is subjected to structural review and is found unsuitable for the red abnormal-load route.

Second, when the issue is permanent underground 220 kV infrastructure, joint bays, chambers, HDD receptor areas, trenching, road reinstatement, and future maintenance near Castlelambert Bridge, the documentation does not appear to provide an equivalent bridge-specific civil engineering assessment.

This is a significant deficiency. The long-term impacts of permanent cable infrastructure are different from, but no less important than, a one-off abnormal-load movement. They include excavation risk, vibration, settlement, drainage alteration, future road reinstatement, future bridge inspection, bridge strengthening, emergency repair access, cable maintenance access and possible sterilisation of road space.

The drawings for the grid connection also state that the underground cable position and the location of joint bays, link boxes, and communications chambers may vary depending on site conditions, and that the drawings are for planning / EIAR purposes and subject to detailed design. This increases the concern that the civil engineering implications at Castlelambert Bridge have not been finally assessed in a sufficiently robust manner.

8.5 Long-Term Infrastructure Impacts

The long-term impacts of placing 220 kV infrastructure at or near Castlelambert Bridge require assessment now, not merely at detailed design stage. Potential long-term impacts include the following:

- Bridge deterioration risk: excavation, trenching, duct installation, HDD receptor works, vibration, and road reinstatement near a structurally constrained bridge may worsen existing defects or accelerate deterioration.

- Settlement and reinstatement risk: joint bays and chambers require excavation and reinstatement. If placed close to bridge approaches, embankments, culverts, or drainage structures, they may contribute to settlement, differential movement, or repeated road-surface failure.
- Drainage and scour risk: works around bridges and road margins may alter drainage patterns. Where a bridge or overbridge is already structurally constrained, drainage changes can be material over the lifetime of the infrastructure.
- Future bridge maintenance conflict: a 220 kV cable, joint bay, link box or communications chamber close to the bridge may restrict future bridge repair, strengthening, replacement or inspection works.
- Emergency works complication: if urgent works are required to the bridge or road, the presence of high-voltage infrastructure may delay access, require specialist supervision, or complicate emergency repairs.
- Public road sterilisation: permanent underground infrastructure may constrain Galway County Council's ability to manage, widen, repair or upgrade the L3103 in the future.
- Unclear responsibility and liability: if bridge deterioration, road settlement, or drainage problems arise after installation, there may be uncertainty over whether responsibility lies with the developer, cable operator, road authority, or bridge owner.

These are not speculative issues. They flow directly from the applicant's own identification of Castlelambert Overbridge as structurally constrained for abnormal-load purposes, combined with the proposed location of permanent grid infrastructure near Castlelambert Bridge.

8.6 Former Estate Road and Heritage Context

There is also a heritage-context issue. The EIAR identifies Castlelambert (CH006) as a country house site within the study area. It records that Castlelambert was built by the

Lambert family in the 18th century after they acquired the estate in 1756, and that Samuel Lewis recorded Castlelambert in 1837 as the principal residence of W. Lambert. The EIAR further notes that the Lambert estate extended to thousands of acres during the 19th century. Separate planning material for the Gannow Renewable Energy Development states that Castle Lambert demesne is depicted on the 1810 OS map, that the proposed grid connection in that case passed through the former demesne, and that roads are depicted passing through the demesne, one of which correlates with the L3103. This is relevant because the L3103 road corridor at Castlelambert may have historical landscape significance, even if Castlelambert Bridge itself is not identified as a Protected Structure.

The road may relate to the former estate landscape, demesne routes, historic boundaries, stone walls, culverts, entrances, or other undesignated built heritage features. The EIAR's assessment of the bridge and road corridor therefore should not be confined to modern engineering function alone.

8.7 Inconsistency Across Project Documentation

The central inconsistency is that the applicant has recognised Castlelambert Overbridge as structurally unsuitable for the red abnormal-load route, but has not shown an equivalent level of bridge-specific civil engineering and heritage assessment for the permanent 220 kV grid connection works proposed at or near Castlelambert Bridge and the L3103 corridor.

This inconsistency undermines confidence in the overall assessment. The same physical location cannot be treated as a material structural constraint for one part of the project, but then treated as an ordinary road corridor for another permanent and long-term component of the same integrated project.

8.8 Required Further Information

An Coimisiún Pleanála should require the applicant to provide a site-specific assessment of

Castlelambert Bridge / Castlelambert Overbridge and the L3103 corridor before any decision is made. This should include:

- a bridge-specific structural condition survey;
- assessment of excavation, trenching, joint bay, and chamber installation near the bridge;
- assessment of HDD receptor works and vibration risk;
- settlement and pavement reinstatement assessment;
- drainage and scour assessment;
- assessment of future bridge maintenance, repair, strengthening, or replacement constraints;
- clear mapping of the cable, joint bays, link boxes, and chambers in relation to the bridge structure and approaches;
- confirmation of whether the L3103 road corridor forms part of, or relates to, the former Castle Lambert demesne road network;
- assessment of potential impacts on undesignated built heritage, including stone walls, culverts, estate boundaries, road fabric or former demesne features;
- agreement with Galway County Council regarding future maintenance, liability, emergency access, and road-opening restrictions.

8.9 Conclusion

The assessment of Castlelambert Bridge and the L3103 corridor is inconsistent and incomplete. The applicant's own civil engineering assessment identifies Castlelambert Overbridge as a structural constraint significant enough to reject the red abnormal-load route. Yet the same area is proposed to accommodate permanent underground 220 kV grid infrastructure, including Joint Bay 08 close to Castlelambert Bridge and HDD receptor infrastructure, without an equivalent bridge-specific long-term assessment.

This is not a minor omission. It affects structural safety, public-road management, future maintenance, emergency repair, public liability, and heritage context. It also highlights a

wider inconsistency in the project assessment: impacts are examined in isolation rather than as part of one integrated infrastructure project.

In the absence of a detailed bridge-specific civil engineering and heritage assessment, the EIAR does not adequately assess the long-term implications of the proposed grid connection at Castletambert Bridge and the L3103 corridor.

Chapter 9: Soil Thermal Resistivity, EPA/GSI Soil Evidence, HDD Crossings and Long-Term Cable Maintenance Impacts

9.1 Summary of Objection

It is submitted that the proposed site and grid connection route are unsuitable, or at minimum inadequately assessed, because the selected location requires an unnecessarily long 220 kV underground cable connection to Cashla substation. The EIAR identifies an approximately 8.1 km underground cable route, predominantly within local public roads, with three HDD motorway crossings: two beneath the M6 motorway and one beneath the M17 motorway.

This is not a minor or incidental element of the development. The cable is essential enabling infrastructure. Without it, the peaker plant cannot export electricity to the grid. Its environmental and engineering risks must therefore be assessed as part of the project as a whole, not deferred to post-consent detailed design.

The EPA/GSI evidence now available from EPA Maps identifies relevant ground conditions along the route and at the proposed site: limestone till with variable texture along the route, and karstified limestone bedrock at or close to the surface at the proposed site. These conditions are material to cable design because high-voltage underground cables rely on the surrounding soil and backfill to dissipate heat. Well-drained mineral soils and karstified limestone are not automatically positive for cable laying. In this context, they create a credible risk of variable moisture, drying-out, high thermal resistivity, air voids, inconsistent heat transfer, and future operational hot spots unless tested and designed for before consent is granted.

The EIAR does not provide a completed route-wide thermal resistivity assessment. Instead, Section 2.3.9.2 indicates that trial holes to measure soil thermal resistivity, trial holes at joint bay positions, and boreholes at HDD locations are to be carried out later as confirmatory

ground investigations. This confirms that the information needed to assess the cable route has not been fully provided to the Commission at the planning stage.

The long-term consequence is significant. If the cable overheats, is derated, fails, or requires thermal remediation, the public road network may have to be reopened for cable maintenance, joint bay works, backfill replacement, or repair. This would create repeat traffic disruption, noise, inconvenience to local residents, emergency-access issues, road damage, and additional project cost over the operational lifetime of the development. These long-term impacts are not adequately assessed in Chapters 4, 9 or 10 of the EIAR, which primarily treat cable-route impacts as short-term construction impacts.

9.2 EPA/GSI Evidence: Limestone Till and Karstified Limestone Bedrock

The EPA Maps evidence should be included as exhibits to the observation. It confirms the relevance of the ground conditions to the proposed route and site. The first EPA Maps screenshot identifies the subsoil in the route area as Limestone Till (Carboniferous), classed as tills/diamictons, with variable texture. The second EPA Maps screenshot identifies karstified limestone bedrock as surface, with bedrock at or close to the surface at the proposed site area.

This matters because a buried 220 kV cable requires a stable and predictable thermal environment. A mapped subsoil of variable limestone till cannot reasonably be assumed to provide uniform thermal performance along an 8.1 km route. Karstified limestone bedrock at or near the surface is also material because karst can include voids, fissures, variable depth to rock, groundwater pathways, and air-filled cavities. Such conditions may affect cable trenching, HDD launch and reception areas, duct design, backfill specification, and long-term heat dissipation.

Figure 1: EPA Maps / Land and Soil / Subsoils evidence for the route area. The side panel identifies Limestone Till (Carboniferous), texture variable, classed as tills/diamictons. The side panel of Figure 1 records the following material information: County Galway; Category: Till

type; Description: Limestone till (Carboniferous); Texture: Variable; Class: Tills (diamictos); Plain English explanation: till is sediment deposited by or from glacier ice. This evidence supports the submission that the route passes through a variable limestone till environment and should not be treated as thermally uniform.

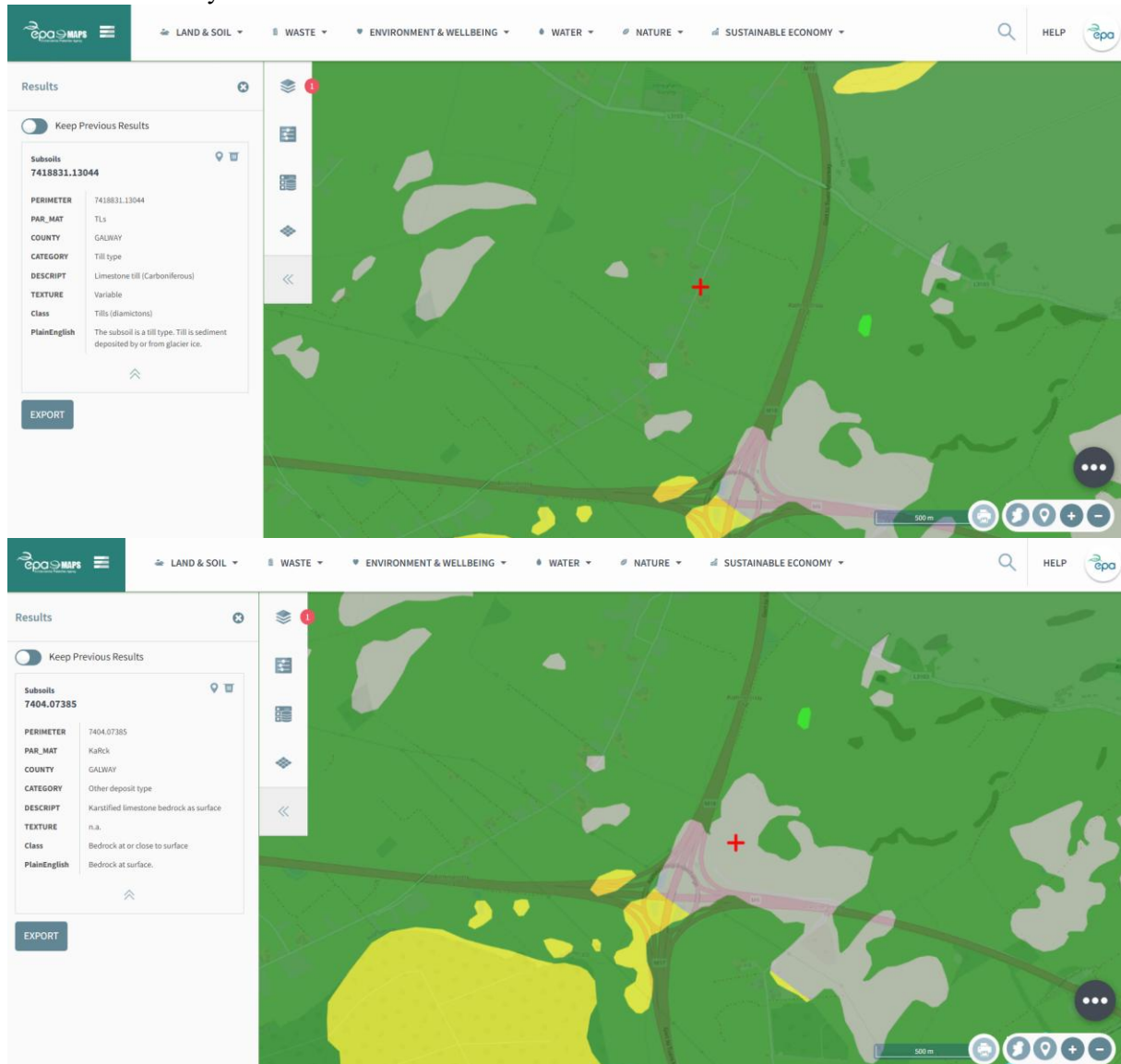


Figure 2: EPA Maps / Land and Soil / Subsoils evidence for the proposed site area. The side panel identifies karstified limestone bedrock as surface, classed as bedrock at or close to surface.

The side panel of Figure 2 records the following material information: County Galway; Category: Other deposit type; Description: Karstified limestone bedrock as surface; Class: Bedrock at or close to surface; Plain English explanation: bedrock at surface. This evidence supports the submission that the chosen site is located in a karstified limestone setting where assumptions about cable trenching, duct installation, HDD risk, and thermal performance require detailed assessment before consent.

9.3 EIAR Evidence and the Missing Thermal Assessment

The EIAR itself acknowledges several facts that make thermal resistivity material to the planning assessment. It confirms that the proposed underground cable route is approximately 8.1 km long and that it runs predominantly in the public road network. It further confirms that the route requires HDD beneath the M6 motorway in two separate locations and beneath the M17 motorway in one location. Chapter 10 identifies the affected local roads as including the L3103, L7108, and L7109.

The EIAR also acknowledges that the route and site are located in a limestone and karst-influenced setting. Chapter 11 states that the proposed UGC route is primarily underlain by limestone-derived tills, while the Cashla Peaker Plant site is underlain by karstified bedrock outcrop or subcrop. Chapter 5 describes the groundwater vulnerability under the site as a combination of Extreme and Rock at or near surface or karst, and identifies shallow and deep well-drained mineral soils. Chapter 12 confirms that the area is underlain by a Regionally Important Aquifer - Karstified (conduit), and that karst features are relevant to local hydrogeology.

These are not merely geological background facts. They directly affect the suitability and environmental performance of a buried 220 kV cable. Thermal resistivity testing is required because the cable route must dissipate operational heat. Where the surrounding ground is dry, well drained, variable, rocky, karstified or ducted, the cable may be more vulnerable to heat build-up, derating and future maintenance intervention.

The EIAR does not provide completed route-wide thermal resistivity testing. Section 2.3.9.2 states that confirmatory ground investigations will be required for detailed design and that trial holes will be carried out to obtain ground conditions and measure soil thermal resistivity. It also states that ground investigations to inform the UGC route may include slit trenches at service crossings, trial holes at all joint bay positions to ascertain ground conditions and

thermal resistivity, and boreholes at HDD locations to ascertain ground conditions.

This is a critical admission. The EIAR is effectively leaving the thermal characterisation of the cable route to future detailed design. That approach is not adequate where the environmental effects of the chosen route depend on the actual cable design, backfill specification, ducting arrangements, cable spacing, joint bay design, HDD methodology, maintenance access requirements, and the risk of future road openings.

9.4 Well-Drained Soils Are Not a Positive Factor for High-Voltage Cable Thermal Performance

The EIAR describes the underlying soils as shallow and deep, well-drained mineral soils in relevant parts of the project area. That may be presented as a positive factor in ordinary drainage terms. However, for a buried high-voltage cable, a well-drained soil environment is not automatically beneficial. It may be a risk factor because the ability of the ground to conduct heat away from the cable is strongly influenced by moisture content and density.

A high-voltage cable produces heat during operation. The surrounding ground and backfill must transfer that heat away from the cable so that the conductor, insulation, joints, and ducts remain within safe operating temperatures. If the ground dries out, if voids are present, if the backfill is unsuitable, or if the cable is installed in a duct with poor heat transfer, thermal resistivity increases, and the cable can run hotter. This can reduce cable capacity, shorten cable life, and create a higher risk of cable faults or future maintenance.

The EPA Maps evidence of variable limestone till and karstified limestone bedrock at or close to the surface reinforces this concern. Limestone till can vary over short distances in clay, silt, sand, gravel, stone, and boulder content. Karstified limestone can include fractures, air voids, conduits, and rapid groundwater pathways. These ground conditions should not be assumed to behave as a consistent thermal medium over an 8.1 km route.

In other words, the same well-drained characteristics that may reduce surface-water retention

may also allow moisture to drain away from the cable environment or vary seasonally. That is material because peer-reviewed literature confirms that underground cable ampacity and operating temperature are sensitive to soil thermal resistivity, moisture content, dry-out behaviour, burial depth, bedding, backfill and duct conditions.

9.5 Peer-Reviewed Scientific Support

The following peer-reviewed literature supports the objection that route-specific soil thermal resistivity and cable thermal modelling are required before consent, particularly for a long underground grid connection in variable limestone till and karstified ground.

Malmedal, Bates, and Cain (2014) state that one of the most important factors affecting underground cable ampacity is soil thermal resistivity, that soil thermal resistivity varies with moisture content, and that heat generated by cables can dry the soil, thereby changing thermal resistivity. Their paper also explains that the heat generated by a buried cable must be carried away through the surrounding soil, and that the rate of heat dissipation determines the cable temperature under load.

Gouda, El Dein, and Amer (2011) examine dry-zone formation around underground power cables. They identify thermal resistivity of the surrounding soil as one of the factors affecting cable loading and explain that dry zones can form under loading conditions due to moisture migration. They investigate the effect of such dry zones on cable ampacity and derating. This is directly relevant to well-drained limestone till, where moisture conditions may be variable and where heat from the cable may promote local drying.

Chatzipanagiotou, Chatziathanasiou, De Mey, and Wiecek (2017) demonstrate experimentally that underground cable ampacity depends heavily on the ability to diffuse resistive heat to the environment and that this ability is sensitive to soil moisture content, buried depth, cable arrangement, and backfill material. This supports the submission that thermal resistivity testing cannot be left to a generic assumption or a post-consent exercise.

Salata, Nardecchia, Gugliermetti and de Lieto Vollaro (2016) emphasise the need to dissipate heat generated by underground power cables and explain that thermal stress in cable insulating materials must be avoided. They also note that simplified standard formulae may not capture the complexity of real underground cable laying, particularly where different materials surround the cable. This is relevant to an 8.1 km route through roads, variable limestone till, rock, joint bays, and HDD sections.

Metwally, Al-Badi, and Al Farsi (2013) identify soil thermal resistivity, cable burial depth, cable separation, bedding and backfill thermal conductivity, nearby heat sources, and dry-zone formation as factors influencing ampacity and temperature rise in underground cables. They also state that underground cables must be derated when dry zones form around them. This supports the submission that the Commission must know the actual route-specific thermal conditions before it can assess whether the proposed cable can safely and reliably operate.

Becker, Misra, and Fricke (1992) show that soil thermal conductivity is significantly influenced by saturation and dry density. This is relevant to the EPA/GSI evidence because the mapped subsoil is not a uniform engineered medium; it is variable limestone till and karstified limestone bedrock at or near the surface within the site area.

Liu, Mao, Zhang, Wu, Liang, and Chen (2025) examine limestone sand and soil mixtures typical of karst regions and find that thermal conductivity is influenced by limestone sand content, moisture content, dry density, and particle-size distribution. While that study concerns buried heat-exchanger backfill rather than this specific cable route, it supports the broader proposition that limestone/karst-region materials require measured thermal characterisation rather than assumption.

Finally, the Horizontal Direct Drilling (HDD) and duct issue is also supported by peer-reviewed literature. Quercio, Del Pino Lopez, Grasso and Canova (2024) analyse high-

voltage power cables installed in unfilled plastic ducts and explain that air inside a pipe creates an insulating layer that does not favour heat exchange. Gao, Deng, Yu, Zhang, Deng, Wang, and Liu (2025) specifically consider directional-drilling duct-laid cables and state that such cables can face limited ampacity due to poor thermal dissipation. These papers directly support the need for separate thermal assessment of the M6 and M17 HDD crossings, rather than treating HDD as merely a construction convenience.

9.6 HDD Crossings Are Specific Thermal and Maintenance Risk Locations

The three HDD crossings are particularly significant. HDD is used where open trenching is not possible or not acceptable, such as under motorways. While HDD may reduce surface disruption during construction, it does not remove the need to assess long-term thermal performance. In fact, HDD sections can create their own thermal constraints because cables may be installed deeper, within ducts, in constrained corridors, and in ground that is less readily accessible for repair.

A conventionally trenched cable can be surrounded by carefully specified thermally stable backfill. A ducted HDD section may have different heat-transfer characteristics, especially if there is an air gap, grout, duct material, variable ground contact, or limited moisture around the installation. The peer-reviewed literature on high-voltage cables in ducts and directional-drilling duct-laid cables shows that poor heat dissipation and ampacity limitation are recognised technical concerns.

The EIAR does not provide completed borehole information, thermal resistivity results or thermal modelling for the HDD sections beneath the M6 and M17. It merely states that boreholes at HDD locations may be carried out later to ascertain ground conditions (EIAR 2.3.9.2.). That is not sufficient. The HDD locations should be treated as potential thermal bottlenecks and as potential future maintenance constraints. If a fault, overheating issue, duct

failure, or thermal remediation requirement arises at or near a motorway crossing, the consequences for road infrastructure, maintenance access, cost, and public disruption are materially different from those of an ordinary field or short road crossing.

9.7 Long-Term Road, Traffic, Resident and Sustainable Development Impacts

The EIAR addresses the construction phase of the cable route, including traffic management, road openings, road closures, and construction noise. However, it does not adequately assess the long-term maintenance consequences of installing a high-voltage cable over approximately 8.1 km, largely within local public roads, in a variable limestone till and karstified limestone setting, without completed route-specific thermal-resistivity evidence. This is a material omission. If the cable is thermally constrained, overheats, is derated, develops faults, or requires future remediation, the public road network may have to be reopened. Maintenance works may require excavation at joint bays, duct transition points, road sections, HDD launch or reception areas, or thermally weak sections of the route. Such works would inconvenience local residents, farms, and businesses; impede traffic; disrupt school, work, and service journeys; affect emergency access; create noise and vibration; and impose further costs on the project and potentially on public road-management resources. The EIAR appears to characterise cable-route impacts primarily as short-term construction impacts. Chapter 9 assesses construction noise from the cable route and HDD works as temporary or short-term. Chapter 10 assesses construction traffic and road closures but does not address recurring maintenance interventions caused by cable overheating or thermal remediation. Chapter 4 does not appear to adequately address the community health, well-being, and accessibility effects of future road excavation over the operational life of the project.

This is especially important because the proposed plant is expected to operate up to 2050.

The cable is therefore not a temporary construction issue; it is a long-term piece of buried critical infrastructure. Its maintenance risks and road-opening consequences should form part of the environmental assessment and the reasonable alternatives assessment.

9.8 Reasonable Alternatives and Site Selection

The selected site appears to impose avoidable environmental and infrastructural impacts by requiring a long underground 220 kV cable route to Cashla substation. A site located west of the motorway and closer to Cashla substation would appear capable of materially reducing the length of cable required, the extent of public road disturbance, the number of joint bays, the scale of excavation, the amount of imported thermally suitable backfill, the need for HDD, and the long-term risk of road-opening maintenance.

The EIAR should not assess the peaker plant site in isolation from its grid connection.

The cable is not optional. It is functionally necessary. A reasonable alternatives assessment should therefore compare alternative sites not only by plant-site constraints, but by total project impacts, including cable length, road disruption, HDD complexity, karst risk, soil thermal resistivity, groundwater vulnerability, cable maintenance risk, and the cumulative burden on local roads and residents.

In the absence of such a comparative assessment, the Commission cannot be satisfied that the chosen site is the least environmentally damaging or most sustainable option. The environmental burden of the selected site is materially increased by the long cable route, and that burden has not been fully assessed.

9.9 Requested Findings / Conditions

The Commission is requested to find that the EIAR is deficient insofar as it does not provide completed route-wide soil thermal resistivity testing, thermal dry-out assessment, and cable thermal modelling for the entire 220 kV underground grid connection route, including all joint bays, road sections, HDD launch/reception areas, and HDD crossings beneath the M6

and M17.

The Commission is also requested to find that the long-term traffic, road, resident, emergency-access, and sustainable development impacts of future cable maintenance have not been adequately assessed. These impacts are not merely speculative engineering matters. They are foreseeable consequences of placing a critical high-voltage cable over a long route in local roads through variable limestone till and karstified limestone conditions.

It is further submitted that material environmental information should not be deferred to post-consent detailed design. If the Commission is minded to consider permission, it should first require the applicant to submit, for public consultation and assessment, a completed route-specific thermal resistivity and cable thermal design report, including:

- in-situ and laboratory soil thermal resistivity testing along the full 8.1 km route;
- testing at joint bays, road sections, transition pits, HDD launch/reception pits, and all HDD crossings;
- seasonal moisture and dry-out sensitivity analysis, including the implications of well-drained mineral soils;
- thermal modelling of direct-buried and ducted cable sections, including all HDD sections;
- identification of thermal bottlenecks, derating risk, cable temperature limits, and long-term operational margins;
- specification of thermally stable backfill, bedding, ducting, spacing, and any required monitoring;
- a long-term maintenance and road-opening assessment for the cable route over the lifetime of the project; and
- a comparative alternatives assessment of a shorter grid connection route, including a site west of the motorway and closer to Cashla substation.

In the absence of this information, the application should be refused, or further information

should be required before any decision is made. A condition requiring thermal testing after permission would not cure the EIA defect because the public and the Commission would have been denied the opportunity to assess the environmental consequences of the actual cable design and route before consent.

9.10 References

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EPA Maps / Geological Survey Ireland subsoil evidence: observer-supplied screenshots included above as Figures 1 and 2.

Cashla Peaker Plant EIAR, Volume 2 - Main EIAR, February 2026, including Sections 2.3.9.2, 10.3.3.2, Chapters 5, 9, 10, 11 and 12.

Chapter 10: Construction Noise, Human Health and Structural Risk to Homes

This chapter addresses deficiencies in the assessment of construction noise, vibration, human health, and structural risk arising from the proposed Cashla Peaker Plant and associated grid connection works. Particular concern arises in relation to residents living along the approximately 8.1 km underground cable route, the use of horizontal directional drilling or microtunnelling at crossing points, potential piling or vibration-generating construction activities, and the presence of karst limestone ground conditions. The concern is not limited to whether generic construction noise limits have been applied. The issue is whether the assessment has properly examined the effects on real residents, real houses, and real ground conditions along the route before concluding that effects are not significant.

10.1 What the EIAR appears to have assessed

The EIAR states that there is no published statutory Irish guidance setting a maximum permissible construction noise level. The assessment therefore relies on British Standard BS 5228:2009+A1:2014 for construction noise and vibration, together with other guidance including BS 6472, BS 7385, DMRB LA 111, ISO 9613-2, and TII/NRA noise guidance. For residential and other noise-sensitive locations, the EIAR reproduces BS 5228 threshold values and adopts daytime construction criteria. For linear construction works associated with the proposed grid connection, the EIAR adopts a fixed weekday construction noise threshold of 70 dB LAeq,1hr, noting the short-term, moving nature of the works. (EIAR Volume 2, Chapter 9, pp. 443-444).

The Non-Technical Summary states that the baseline noise environment was established by environmental noise surveys comprising two attended and two unattended monitoring locations. It also states that construction noise levels at various setback distances were calculated and that standard controls such as restricted working hours and noise management

measures would be applied. It concludes that main-site construction noise effects would be negative, not significant and short-term, and that underground cable construction noise and vibration impacts would be negative, not significant to moderate and temporary. (NTS Volume 1, Chapter 9, pp. 48-49).

10.2 Construction Noise Along the Underground Cable Route

The EIAR confirms that the underground cable route is approximately 8.1 km in length and that construction is expected to take approximately nine months. The works are described as a rolling construction method of approximately 30-50 m per day. The EIAR identifies that the nearest noise-sensitive locations along the underground electrical cable route are at distances of the order of 10-30 m from the works. (EIAR Volume 2, Chapter 9, p. 461).

The EIAR predicts that construction plant used along the underground cable route could generate high short-term noise levels. Table 9-17 predicts a total construction noise level of 87 dB LAeq,1hr at 10 m, 83 dB at 15 m, 77 dB at 30 m, and 75 dB at 40 m from the edge of works. The EIAR states that at distances of 40 m and greater the predicted levels are within the 70 dB criterion; however, at shorter distances this criterion is exceeded and indicates a potential significant effect. (EIAR Volume 2, Chapter 9, p. 461).

This is important because the EIAR itself states that the nearest noise-sensitive locations along the cable route may be only 10-30 m from the works. On the EIAR's own figures, receptors at these distances may experience predicted construction noise above the adopted threshold. The conclusion that effects are not significant or only temporary therefore depends heavily on the assumption that works will pass quickly and that exposure at any individual dwelling will last less than one day. That assumption does not fully address the cumulative lived experience of residents along the route, nor does it address repeated disturbance from advance works, trenching, joint bay construction, road closures, reinstatement, deliveries, traffic management, night or weekend constraints, or works that may be delayed by ground

conditions, services, weather, traffic, utilities, or unforeseen karst features.

10.3 Human Health and Vulnerable Residents

The Population and Human Health chapter identifies construction-stage impacts associated with disruption and access changes for residential properties adjacent to the proposed cable route, businesses, and community assets, including Lisheenkyle National School. The Non-Technical Summary accepts that significant adverse impacts are likely in relation to access disruption for residential properties adjacent to the cable route, although these are described as temporary and limited to the construction phase. (NTS Volume 1, Chapter 4, p. 29).

However, there is a material distinction between a generic population assessment and a resident-specific human health assessment. The EIAR appears to assess people primarily as “noise-sensitive locations” or broad population groups. It does not appear to show that individual residents along the route were assessed for medical vulnerability, disability, sensory sensitivity, sleep disturbance, home-based care needs, respiratory or cardiac illness, anxiety, autism, shift work, elderly residents living alone, young children, or other circumstances that may materially increase sensitivity to construction noise, vibration, road closures, reduced access, and prolonged disruption.

This is a significant omission. A construction noise level that is assessed as tolerable against a generic daytime construction criterion may still have a materially greater effect on a medically vulnerable resident, a person recovering from illness, an elderly person, a person with sensory sensitivity, or a household dependent on uninterrupted access for carers, medical appointments, school transport, farming, emergency services, deliveries, or disability access. The assessment does not appear to include a confidential vulnerable-resident identification process, a resident liaison protocol tailored to health sensitivity, a procedure for alternative access or respite arrangements, or a mechanism for enhanced mitigation where vulnerable residents are identified.

10.4 HDD, Microtunnelling, Vibration and Piling

The EIAR assesses noise at motorway crossing works and identifies plant including a wheeled loader lorry, microtunnelling equipment, dump truck and HGV movements. It predicts total construction noise levels of 62 dB LAeq,1hr at 45 m, 57 dB at 75 m, and 54 dB at 90 m, and concludes that significant noise effects are not predicted for the nearest noise-sensitive locations at those distances. (EIAR Volume 2, Chapter 9, p. 463).

For construction vibration, the EIAR states that standard excavation machinery is not anticipated to generate appreciable levels of vibration close to the source. It further states that where piling occurs on-site, the closest noise-sensitive locations are more than 450 m away, and that vibration from bored piling is anticipated to be less than 1 mm/s at 5 m from a standard rig. On that basis, the EIAR concludes that vibration would be neutral, imperceptible, and short-term. (EIAR Volume 2, Chapter 9, pp. 463-464).

This conclusion may address the main peaker plant site, but it does not adequately answer the risk position for homes and private structures located along the linear underground cable route, at or near HDD or microtunnelling areas, at launch and reception pits, near joint bays, near trenching, near heavy plant routes, near local bridges and culverts, or in karst-sensitive areas. The assessment of HDD vibration appears to be discussed primarily in the context of a cultural heritage structure on the underground cable route, rather than as a systematic property-by-property assessment of nearby homes, farm buildings, boundary walls, wells, private drainage systems, septic tanks, culverts, road-edge structures, or other private assets.

10.5 Structural Condition of Homes and Private Property

The documentation reviewed does not appear to contain a clear commitment to pre-construction structural condition surveys of homes and other private structures located within a defined zone of influence of drilling, piling, trenching, HDD, launch and reception pits, joint bays, heavy plant movements, road closures, or construction compounds. This is a

serious gap because, without a baseline condition survey, residents may later be placed in the unfair position of trying to prove whether cracks, settlement, drainage failure, wall movement, well impacts, or other defects were caused or worsened by the works.

A proper assessment should not be limited to whether vibration is predicted to be below generic building damage thresholds. It should identify the actual age, condition, and vulnerability of buildings and structures near the works. Older rural houses, farm buildings, boundary walls, stone walls, private wells, septic tanks, private drains, culverts, and road-edge structures may be more vulnerable than a generic modern building assumed in a desk-based assessment. A home with existing cracks, shallow foundations, water ingress, subsidence history, poor ground bearing, or proximity to karst voids may require more conservative controls than those applied to a standard receptor.

10.6 Karst Ground Conditions and Structural Risk

Karst ground conditions increase the importance of robust pre-construction assessment. The EIAR includes a Land, Soils, and Geology chapter and identifies bedrock geology, ground investigation, karst landforms, and geo-hazards as relevant matters. In karst limestone, ground behaviour can be variable and unpredictable. Features such as voids, cavities, solution channels, weak zones, variable rockhead, preferential groundwater pathways, swallow holes, and settlement-sensitive ground can increase risk during excavation, drilling, piling, dewatering, trenching, and heavy plant operation.

In a karst environment, a generic conclusion that vibration levels will be low is not enough. The risk is not only direct vibration damage. It also includes the potential for ground loss, settlement, collapse of small voids, migration of fines, changes in groundwater pathways, impacts on wells, impacts on septic tanks and private drainage, and damage to structures caused by localised ground instability. Where drilling fluids are used, there may also be a risk of loss of fluid into cavities or preferential pathways. These risks should be identified and

controlled before works commence, especially where works pass close to private dwellings or other sensitive structures.

10.7 What Should Have Been Carried Out

A robust construction noise, vibration, human health, and structural risk assessment should have included the following measures before a conclusion of no significant effect was reached.

First, there should have been a property-by-property receptor schedule for the underground cable route, HDD locations, joint bays, launch and reception pits, construction compounds, access roads, and heavy plant routes. This should identify each dwelling, farm, business, school, community asset, private well, septic tank, boundary wall, culvert, and other sensitive receptor; distance from the works; type of construction activity; duration; predicted noise; predicted vibration; access disruption; and proposed mitigation.

Second, there should have been a confidential vulnerable-resident procedure. Residents should not be required to publish private medical information, but the developer should be required to provide a confidential mechanism for identifying households requiring additional mitigation. This may include elderly residents, disabled residents, people with serious illness, sensory sensitivity, respiratory or cardiac conditions, home-based care needs, children, shift workers, people requiring regular medical access, and households dependent on uninterrupted access for carers or emergency services.

Third, baseline noise monitoring should have been carried out or committed at representative homes along the cable route, not only at general monitoring locations associated with the main site. Rural baseline noise levels can be low, and a short-term construction event may be particularly intrusive where existing conditions are quiet.

Fourth, pre-construction structural condition surveys should be required for homes and private structures within a defined zone of influence of trenching, drilling, HDD, piling, joint

bay works, launch and reception pits, road openings, heavy plant movements, and karst-sensitive works. These surveys should include photographs, written schedules of condition, cracks, settlement indicators, wells, septic tanks, private drains, boundary walls, outbuildings, culverts, and road-edge structures. The surveys should be undertaken by suitably qualified independent surveyors and copied to the property owner before construction starts.

Fifth, vibration monitoring should be required during works near homes and sensitive structures. Monitoring should include clear trigger levels, stop-work thresholds, emergency response procedures, independent review, and timely reporting to affected residents and the planning authority. Monitoring should not be limited to cultural heritage structures or public infrastructure where private homes may also be at risk.

Sixth, a karst-specific construction risk assessment should be required before drilling, piling, or deep excavation. This should include additional ground investigation where necessary, assessment of void/cavity risk, settlement risk, groundwater pathways, private wells and drainage systems, and method statements for encountering voids, loss of drilling fluid, instability, unexpected groundwater, or subsidence. The assessment should define conservative working methods in karst-sensitive locations and provide an emergency response plan for ground movement or damage to private property.

Seventh, a resident protection and damage protocol should be imposed before construction. This should include a named community liaison officer, advance notice of noisy or disruptive works, access arrangements, complaint response times, independent investigation of alleged damage, emergency access arrangements, and a clear compensation or repair mechanism where damage is linked to the works. Residents should not be left without baseline evidence or forced into prolonged disputes after construction has commenced.

10.8 Conclusion

The construction noise, vibration, and human health assessment is inadequate because it appears to rely on generic criteria, rolling works assumptions, and standard mitigation rather than a property-specific assessment of residents and homes along the route. The EIAR itself identifies that receptors along the underground cable route may be as close as 10-30 m from works and that predicted construction noise at these distances may exceed the adopted threshold. It also accepts that significant adverse construction-stage access impacts are likely for residential properties adjacent to the cable route.

The absence of evidence that residents were assessed for medical vulnerability is a material gap in the human health assessment. The absence of a clear commitment to pre-construction structural condition surveys of homes and private structures is also a material gap, particularly in a karst limestone environment where ground conditions may be variable and where drilling, trenching, piling, vibration, groundwater movement, or settlement could affect existing buildings, private wells, drains, walls, and other structures.

The planning authority should require the applicant to provide a property-specific construction noise, vibration, human health, and structural risk assessment before any permission is granted or, at a minimum, before any construction works commence. This should include vulnerable-resident procedures, baseline noise monitoring, structural condition surveys, karst-specific risk assessment, vibration monitoring, stop-work thresholds, independent reporting, and a binding damage and compensation protocol for affected residents.

10.9 Source References

Cashla Peaker Plant EIAR, Volume 1 Non-Technical Summary, Chapter 4 Population and Human Health, p. 29.

Cashla Peaker Plant EIAR, Volume 1 Non-Technical Summary, Chapter 9 Noise and

Vibration, pp. 48-49.

Cashla Peaker Plant EIAR, Volume 2 Main EIAR, Chapter 9 Noise and Vibration, pp. 443-444, 459, 461, 463-464.

Cashla Peaker Plant EIAR, Volume 2 Main EIAR, Chapter 11 Land, Soils and Geology.

EPA, Guidelines on the information to be contained in Environmental Impact Assessment Reports, May 2022.

BS 5228:2009+A1:2014, Code of practice for noise and vibration control on construction and open sites.

BS 6472-1:2008, Guide to evaluation of human exposure to vibration in buildings.

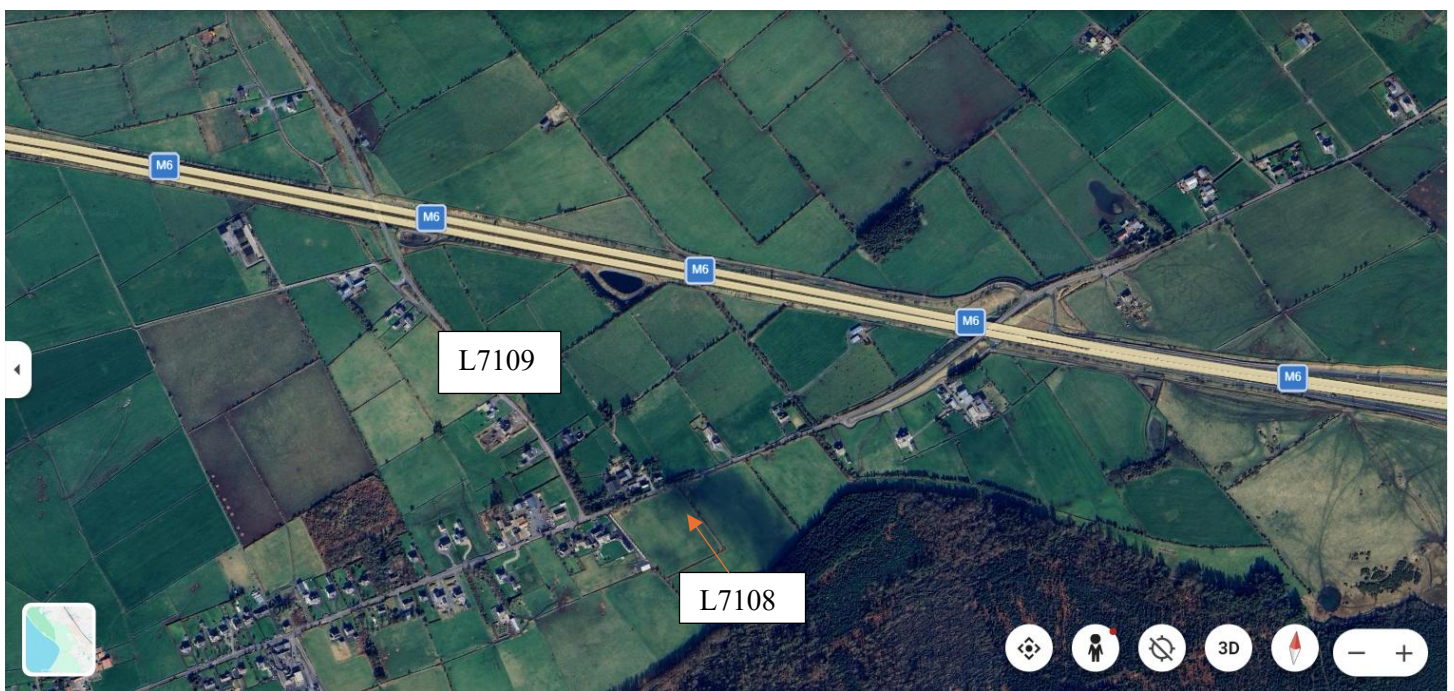
BS 7385-2:1993, Evaluation and measurement for vibration in buildings - Guide to damage levels from groundborne vibration.

Transport Infrastructure Ireland / National Roads Authority, Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes, 2014.

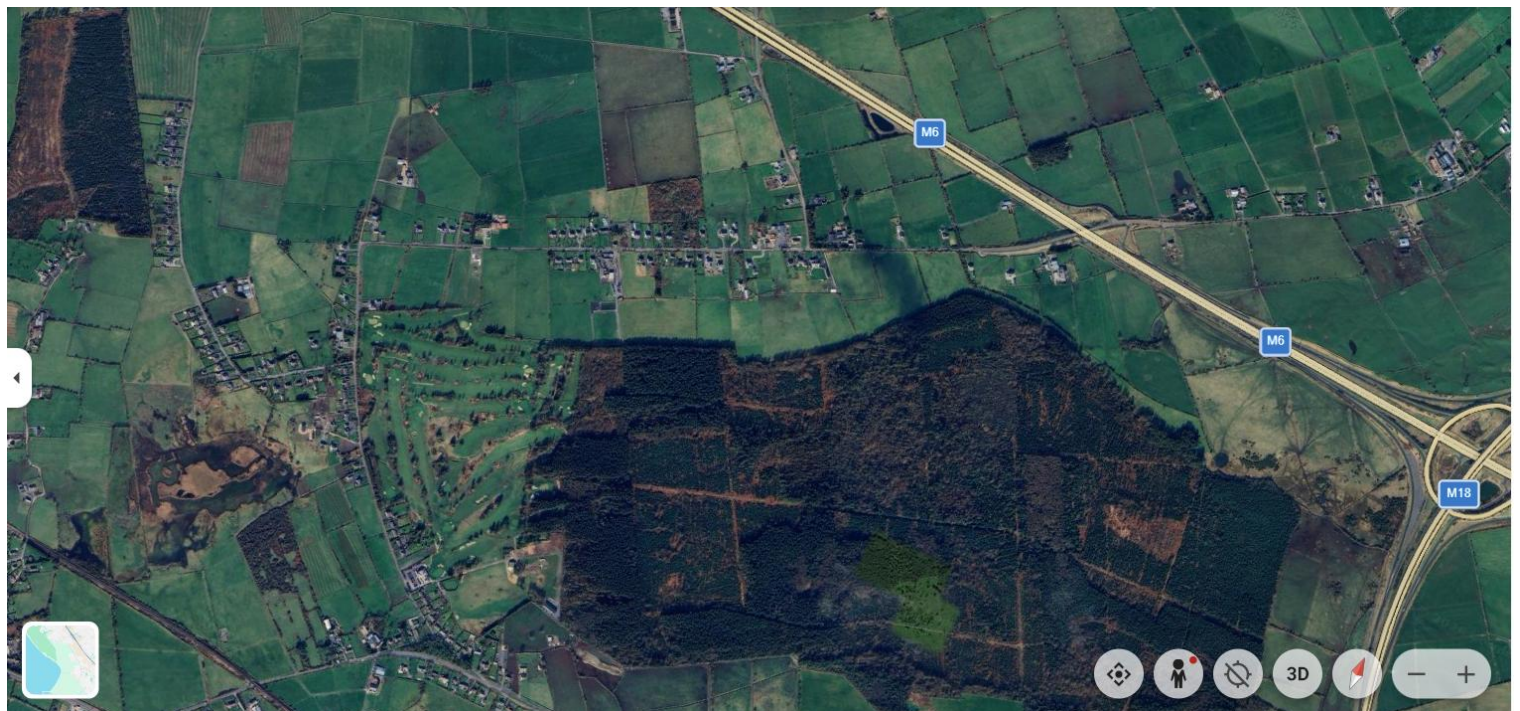
10.10 Appendix A: Overview of local road network



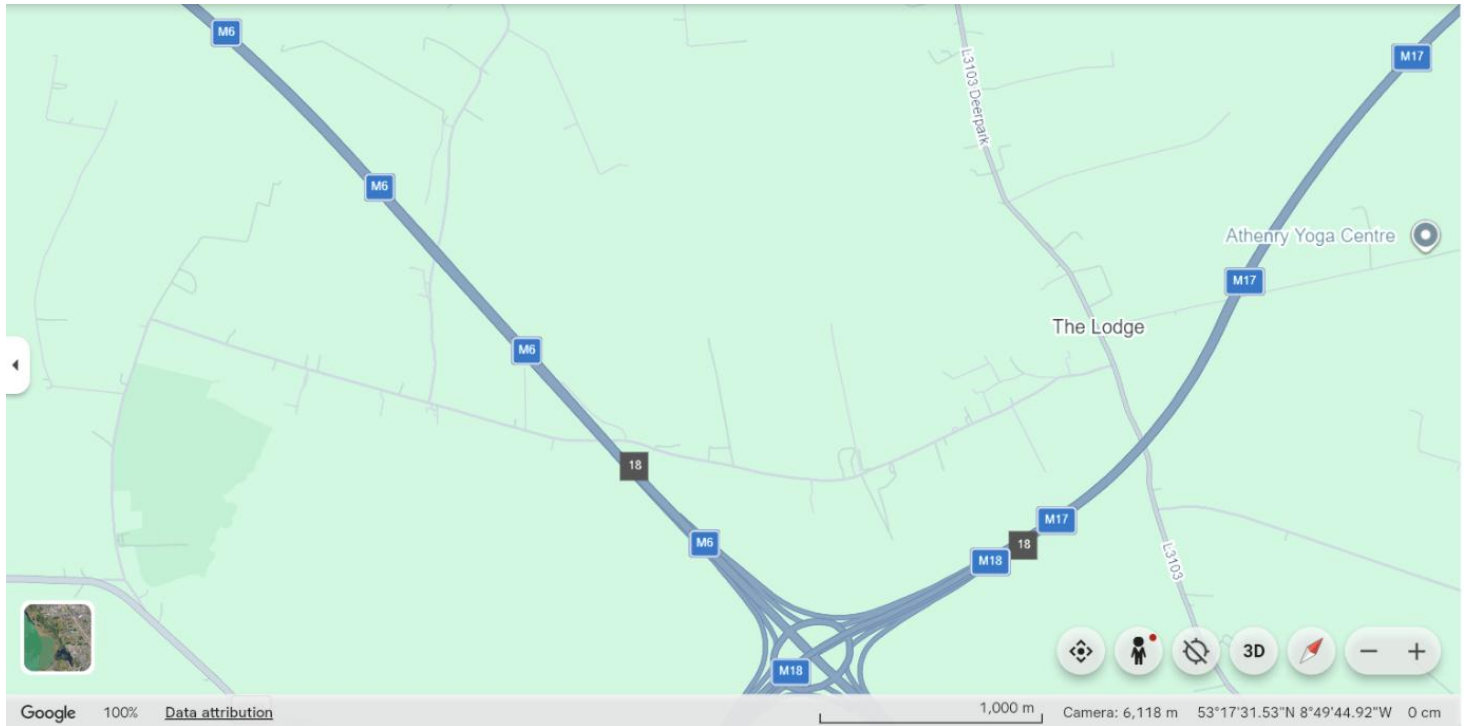
The above picture indicating the population density on the upper end of the L7108.



The above picture demonstrates the population density at the mid-section of the L7108 and junction with L7109. This is a heavily used road.



Overview of community/commuter belt using L7108 and L7109



Overview of the road network available to the local community. A road closure or restriction would have a disproportionate effect on the area's residents.

Chapter 11: Human Health, Vulnerable Residents and Critical Utility Dependence

11.1 Introduction and scope

This chapter addresses a distinct human-health issue arising from the proposed Cashla Peaker Plant underground grid connection works: the applicant's apparent failure to demonstrate a sufficient understanding of the medical, emergency-access, and utility-dependence needs of residents and communities affected by the works, including residents along the proposed cable route and people in the wider Athenry area.

This chapter does not examine the legality, duration, design, or detailed traffic implications of the proposed road closures. Those matters are addressed separately. The focus here is narrower but important: whether the Environmental Impact Assessment Report (EIAR) has adequately identified and assessed the risk to residents who may require urgent medical assistance, regular carer or clinical access, continuous electricity supply, functioning telecommunications, broadband or mobile connectivity, or other critical services during construction works and associated access restrictions.

The issue is particularly important because the proposed underground cable route is to be installed along minor local roads, including the L3103, L7108, L7109, and L71093, in a rural area approximately 2 km west of Athenry. The EIAR identifies the underground grid connection as approximately 8.1 km in length and states that the route uses these local roads before connecting to the existing Cashla 220 kV substation. The affected community is therefore not limited to isolated dwellings on the cable alignment. It also includes residents, farms, businesses, service users and people in the wider Athenry area who depend on those local roads and associated services for access, communication and support. [Source: Cashla Peaker Plant EIAR, Volume 2, Chapters 1, 2, 4, 10 and 14.]

11.2 Relevance to population and human health

Population and human health is a mandatory environmental topic within the EIAR. The EIAR itself recognises that vulnerable groups require specific attention and that the factors influencing health and wellbeing can vary by age, disability, health status, income, mobility, social support and access to services.

The EIAR identifies vulnerable receptors in broad terms, including elderly people, people with disabilities, people with health problems or impairments, families with children and other groups who may be more sensitive to changes in access and the surrounding environment. It also recognises transport modes, access and connections as wider determinants of health, because the proposed cable route uses minor local roads and because disruption to access can affect residential properties, businesses and community assets. [Source: Cashla Peaker Plant EIAR, Volume 2, Chapter 4, including the wider determinants of health, vulnerable groups and scoping sections.]

In relation to health and social-care services, the EIAR does not appear to identify a direct physical impact on a health facility. However, this does not resolve the human-health issue. The relevant risk is not only whether a clinic, GP surgery, pharmacy, hospital, primary-care centre or ambulance base is physically affected. The relevant risk is whether residents who rely on timely access to those services, or on those services reaching them, may face increased vulnerability during the construction phase.

That distinction matters. A resident who needs rapid ambulance access, regular nursing care, oxygen deliveries, pharmacy deliveries, dialysis transport, public-health nurse visits, disability transport, family support, or medical-equipment maintenance may be affected even where no healthcare building is directly impacted. The same applies where the resident depends on electricity, broadband, mobile signal or telephone service for home-based healthcare or remote

monitoring.

11.3 Applicant's reliance on generalised assumptions

The EIAR's approach to population and human health appears to be largely high-level and desk-based. It identifies population and vulnerable groups in general terms, but it does not appear to demonstrate that the applicant has sought to establish whether there are specific residents in the affected community with critical medical, disability, mobility, communication, carer-support, or utility-dependence needs.

This is a material weakness. It is not enough to recognise vulnerable groups in the abstract. Where construction works are likely to disrupt local access and require road restrictions close to homes, farms, and businesses, the assessment should explain how the applicant will identify, confidentially and lawfully, whether residents have needs that require special arrangements before works begin.

The EIAR appears to rely on general mitigation such as traffic management, local access, signage, short sections of works, and emergency-access procedures. These are relevant measures, but they do not amount to an understanding of actual community need. They do not answer the basic human-health question: does the applicant know whether any affected resident requires immediate emergency access, daily care access, uninterrupted electricity, continuous internet/mobile connectivity, or functioning telecommunications for health or safety reasons?

On the material reviewed, the answer appears to be no. The applicant has not shown that it has carried out a confidential community-needs process, nor has it shown that it has put forward a mechanism capable of identifying households whose health may be disproportionately affected by temporary access restrictions, utility disruption, or communication failure.

11.4 Medical equipment and dependence on electricity, internet and telecommunications

Modern healthcare is increasingly delivered in the home. Some residents may depend on

electrically powered medical equipment, broadband, mobile signal, landline telephone service, monitored alarms, pendant alarms, telecare devices, remote monitoring systems, or internet-connected medical devices. These dependencies are not unusual or speculative; they are a recognised part of healthcare and utility regulation.

In Ireland, the Commission for Regulation of Utilities recognises vulnerable customers who are critically dependent on electrically powered equipment, including life-protecting devices, assistive technologies and medical equipment. Electricity suppliers are required to maintain updated lists of vulnerable customers so they can be notified in the event of outages or other supply or service issues. ESB Networks also recognises that vulnerable customers include those who need vital electrical medical equipment on a daily basis and maintains a vulnerable-customer register based on information supplied by electricity suppliers. [Sources: Commission for Regulation of Utilities, Vulnerable Customers; ESB Networks, Vulnerable Customers.]

The relevance to this project is direct. Underground cable works may take place near existing electricity and telecommunications services. Excavation, ducting, joint bay works, resurfacing, plant movement, and road restrictions can create risks of accidental service damage, delayed repair access, planned or unplanned outages, or confusion over who must respond when a service fails. Even if the applicant does not intend to interrupt household electricity or telecommunications, the assessment should address the consequence if such services are interrupted during construction.

The EIAR's Material Assets and Built Services chapter appears to address existing services primarily from an engineering perspective: locating services, consulting utilities, and preventing damage. That is necessary, but it is not sufficient from a population and human-health perspective. The applicant must also assess the human consequence of service interruption for residents who depend on electricity, broadband, mobile signal or telephone

access for medical or safety reasons. [Source: Cashla Peaker Plant EIAR, Volume 2, Chapter 14.]

11.5 Heart loop recorders and remote cardiac monitoring

A particular example is the heart loop recorder, also known as an implantable loop recorder or implantable cardiac monitor. Such devices may collect heart rhythm information and transmit it to a hospital or specialist cardiac team through a home monitor, mobile phone app, or other connected device. This form of monitoring can depend on electricity, a charged device, Bluetooth, mobile signal, Wi-Fi, broadband, or other internet connectivity.

Patient information from cardiac-device providers and hospitals confirms the nature of this dependency. South Tees Hospitals NHS Foundation Trust explains that implantable cardiac monitors can send heart rhythm information to a specialist team using either a bedside unit or mobile phone app; bedside monitors use a cellular signal and a power outlet. Boston Scientific explains that its myLUX app transmits heart rhythm data from an insertable cardiac monitor to the healthcare team and requires the mobile device to remain charged, powered on, connected by Bluetooth, and connected to the internet through Wi-Fi or cellular service. [Sources: South Tees Hospitals NHS Foundation Trust, Implantable Cardiac Monitors; Boston Scientific, myLUX Patient App and Stay Connected with myLUX app.]

This example is important because it illustrates why the applicant's assessment cannot be limited to the physical passage of ambulances along a road. A resident's health and monitoring arrangements may depend on an integrated chain of services: electricity to power a home monitor or charge a device, telecommunications or internet connectivity to transmit data, mobile signal to allow remote monitoring, and road access for emergency services, family members, carers, or technicians if a problem occurs.

Remote monitoring devices are not a replacement for emergency services where a person feels unwell, but that does not reduce the need to protect the supporting services. It makes the issue

more serious. If road restrictions, utility disruption, or communication failures occur at the same time, the affected resident may face a combination of risk factors: reduced monitoring reliability, reduced ability to contact help, and reduced ability for help to reach the home promptly.

11.6 Emergency access is treated generically, not as a resident-specific health risk

The EIAR indicates that emergency access during underground grid connection works would be maintained through the existing road network and that, where short closure sections are in place, works could be suspended, excavations plated, and a temporary route made available to emergency vehicles. [Source: Cashla Peaker Plant EIAR, Volume 2, Chapters 2 and 10.]

That is a generic construction response. It does not demonstrate that the applicant has identified households where a delay could be medically critical. It does not show that emergency services have been supplied with property-by-property access information for each phase of works. It does not show that vulnerable residents have been offered a confidential way to notify the contractor, Galway County Council, or emergency services of critical medical-access or utility-continuity needs.

A generic statement that emergency access can be created is not the same as a resident-specific human-health assessment. In a medical emergency, the relevant practical questions include whether an ambulance, fire service, Garda unit, GP, nurse, carer, family member, oxygen supplier, dialysis transport provider, or medical technician can identify the correct access route immediately and reach the property without delay or confusion.

The risk is not confined to a formal 999/112 emergency. A public-health nurse, carer, family member, GP out-of-hours doctor, pharmacy delivery, oxygen delivery, electricity repair crew, or telecommunications repair crew may also need timely access. A resident who is elderly, lives alone, has impaired mobility, has a cardiac condition, depends on powered medical

equipment, or relies on remote monitoring may not be able to tolerate delays that would be merely inconvenient for the general population.

11.7 Athenry and the wider affected community

The applicant's assessment should also consider the relationship between the cable route, the affected rural roads, and the town of Athenry. Athenry is the nearest town and service centre for many residents in the surrounding area. Residents may rely on Athenry for GP access, pharmacy access, public transport, shopping, family support, employment, school access, social care, and other daily needs.

The fact that some properties may not be located directly on a closure section does not mean they are unaffected. Road restrictions and diversions can change how people reach Athenry, how carers and service providers reach residents, and how emergency or utility crews reach properties from Athenry or other service locations. The human-health assessment should therefore consider the practical community network, not only the narrow red-line boundary or the immediate works footprint.

The applicant should have demonstrated an awareness of this community context. On the material reviewed, the EIAR appears to identify vulnerable groups and access impacts in general terms, but does not appear to show a clear understanding of actual needs within the affected community. That absence of community-specific knowledge is central to the concern raised in this chapter.

11.8 Data protection and resident privacy

It is not suggested that the applicant should publish residents' medical information in the EIAR. That would be inappropriate. Health information is highly sensitive. The Data Protection Commission identifies data concerning health as special category personal data under Article 9 of the GDPR and states that processing such data is prohibited except in limited

circumstances. [Source: Data Protection Commission, Special Category Data.]

However, data protection is not a reason to ignore the issue. It is a reason to manage it properly. The appropriate approach would be a lawful, confidential, and proportionate opt-in process through which affected residents could disclose only the minimum necessary information needed to manage construction access, emergency response, utility continuity, and communication requirements.

Such a process would not require the publication of medical details. It would require the applicant, road authority, and relevant bodies to create a secure mechanism for residents to identify critical needs. The process should be voluntary, confidential, limited in purpose, limited in retention, and used only by those who need the information to protect access, emergency response, and service continuity during the works.

11.9 Scoping and mitigation deficiency

This issue represents both a scoping deficiency and a mitigation deficiency.

It is a scoping deficiency because the EIAR recognizes the relevant topics - population and human health, vulnerable groups, access, transport, community safety, health and social-care access, and built services - but does not appear to carry that recognition through to a practical identification of affected residents with critical needs.

It is a mitigation deficiency because the proposed mitigation appears generic. General traffic management, signage, short sections of works, local access arrangements, and emergency plating procedures may reduce ordinary access disruption, but they do not address the specific risk to residents whose health depends on immediate access, uninterrupted electricity, functioning telecommunications, broadband or mobile connectivity, remote medical monitoring, or daily support.

The applicant therefore has not demonstrated that it understands the medical and utility-dependence baseline within the affected community. Without that baseline understanding, the

competent authority cannot be satisfied that the construction-phase effects on vulnerable residents have been adequately assessed, mitigated, or monitored.

This point should not be dismissed as a detailed traffic-management matter to be resolved later. The road-closure chapter will address road restrictions in more detail. This chapter identifies the human-health risk that exists behind those restrictions: the applicant appears not to know who within the affected community may be medically or practically unable to withstand access delays, communication failures, or utility disruption.

11.10 Required mitigation: Critical Access and Utility Continuity Plan

Before any road-opening licence, road closure, trenching, joint-bay construction, resurfacing or associated underground cable works commence, the applicant should be required to prepare a Critical Access and Utility Continuity Plan. This should be a condition of any planning consent and any subsequent road-opening or road-closure approval.

The plan should include the following minimum measures:

1. a confidential opt-in process for affected residents to notify critical medical, mobility, carer, electricity, telecommunications, broadband, internet, remote-monitoring, or emergency-access needs;
2. direct consultation with affected residents, local businesses, Galway County Council, An Garda Síochána, ambulance and fire services, ESB Networks, telecommunications providers, Uisce Éireann, local GP or public-health/community nursing contacts where appropriate, and relevant healthcare transport providers;
3. a property-by-property access protocol for all affected homes, farms, and businesses on the underground cable route and on roads affected by access restrictions or diversion interfaces;

4. a clear emergency-access map for every phase of works, showing how emergency vehicles and urgent support providers will reach each property during each closure or restricted-access section;
5. a no-delay emergency procedure requiring immediate clearance of plant, barriers, and traffic-management equipment where emergency access is needed;
6. a utility-protection and outage-response protocol for electricity, telecommunications, broadband, water, and other services, including immediate escalation if any service to a vulnerable resident is interrupted;
7. advance written notice to affected residents of works, access restrictions, diversions, likely impacts, and any planned service interruptions;
8. a 24-hour contact number staffed by personnel with authority to stop works, move barriers, arrange access, and contact emergency or utility services;
9. specific arrangements for residents who rely on internet-connected or cellular-connected medical monitoring systems, including practical advice about maintaining charged devices and alternative contact arrangements during any service disruption; and
10. a complaints, access incident, and utility-interruption log, with reporting to Galway County Council and corrective action where access or utility continuity fails.

11.11 Suggested condition

The following condition should be sought:

No road closure, road opening, trenching, joint-bay construction, resurfacing, or associated underground cable works shall commence on the L3103, L7108, L7109, L71093, or any affected access or diversion road until a Critical Access and Utility Continuity Plan has been submitted to and agreed in writing with Galway County Council. The plan shall be prepared in consultation with affected residents and

businesses, An Garda Síochána, ambulance and fire services, ESB Networks, telecommunications providers, Uisce Éireann, and other relevant bodies.

The plan shall include confidential opt-in arrangements for identifying households with medical, disability, mobility, carer, electricity-dependent medical equipment, remote medical monitoring, telecommunications, broadband, internet, or emergency-access needs. It shall also include property-specific access arrangements, emergency vehicle protocols, utility-continuity measures, outage-response procedures, advance notification requirements, a 24-hour contact number, and a process for logging and resolving access, communication, and utility-continuity incidents. No works shall proceed unless emergency access and critical utility continuity can be maintained at all times.

11.12 Conclusion

The EIAR identifies vulnerable groups and acknowledges that access disruption may have significant effects during construction. However, it does not appear to demonstrate that the applicant has adequately understood or assessed the actual medical, emergency-access and utility-dependence needs of residents affected by the proposed works, including residents along the cable route and people in the wider Athenry area.

The applicant has not, on the material reviewed, shown that it knows whether affected residents require emergency medical access, daily carer access, electricity for medical equipment, internet or mobile connectivity for cardiac or other remote monitoring, functioning telecommunications, or other critical support. This is a material gap in the Population and Human Health assessment and in the proposed mitigation.

The concern is not that private medical information should have been published. It should not be. The concern is that the EIAR does not appear to provide a lawful, confidential and practical mechanism for identifying and managing foreseeable needs within the affected community.

This should therefore be treated as a lack of adequate scoping, baseline understanding and mitigation. It can be addressed only by requiring a confidential, practical and enforceable Critical Access and Utility Continuity Plan before any works affecting local access, utilities, communications or emergency response are allowed to proceed.

11.13 References

1. Cashla Peaker Plant Environmental Impact Assessment Report (EIAR), Volume 2 - Main EIAR, Bord Gais Energy Ltd., February 2026, including Chapters 1, 2, 4, 10 and 14.
2. Commission for Regulation of Utilities, Vulnerable Customers: <https://www.cru.ie/consumer-information/your-rights/vulnerable-customers/>
3. ESB Networks, Vulnerable Customers: <https://www.esbnetworks.ie/services/power-outages/vulnerable-customers>
4. Data Protection Commission, Special Category Data: <https://www.dataprotection.ie/en/organisations/know-your-obligations/lawful-processing/special-category-data>
5. South Tees Hospitals NHS Foundation Trust, Implantable Cardiac Monitors: <https://www.southtees.nhs.uk/resources/implantable-cardiac-monitors/>
6. Boston Scientific, Getting Started with the myLUX Patient App: <https://www.bostonscientific.com/en-US/patients-caregivers/device-support/cardiac-monitor/getting-started-mylux.html>
7. Boston Scientific, Stay Connected with myLUX app: <https://www.bostonscientific.com/en-US/patients-caregivers/device-support/cardiac-monitor/using-mylux.html>

Chapter 12: Short-Term Wider Impacts of Restrictions on the L3103, Sustainable Mobility, Roads and Human Health

12.1 Introduction and scope

This chapter examines the short-term impacts of the proposed Cashla Peaker Plant and associated underground grid connection works on the L3103, the Athenry sustainable mobility network, local community access, and human health. It is prepared for inclusion in a wider submission or report.

The chapter is focused on the policy and human-health implications of construction-phase disruption to a road which is not merely a local vehicular route, but forms part of the movement network serving Athenry and its surrounding rural communities. It also considers whether the proposed development has properly assessed the implications for adopted transport, walking, cycling, climate, and public-health objectives.

The L3103 is identified in the Athenry Local Area Plan 2024-2030 and associated Local Transport Plan as part of the town's active travel and sustainable mobility framework, including walking/cycling, traffic-calming, footpath, and crossing improvements. The road also provides access to the wider Athenry area, nearby residential properties, agricultural lands, local businesses, and community/sporting facilities, including Athenry Athletics Club and Athenry Association Football Club.

12.2 Project elements affecting the L3103

The Cashla Peaker Plant EIAR states that the proposed project is located at Pollnagroagh / Rathmorrissey, approximately 2 km west of Athenry. The proposed main site access would be provided by a new access road of approximately 1.15 km connecting to the L3103, approximately 1 km east of the M17 motorway. The EIAR also states that the underground grid connection route is approximately 8.1 km long and includes works along the L7109,

L71093, L7108, and L3103 roads.

Accordingly, the L3103 is affected in two ways. First, it is the proposed access point for the main construction and operational site. Secondly, it forms part of the underground cable route and associated temporary traffic-management area. These effects arise in addition to wider construction traffic, worker traffic, material deliveries, abnormal load movements, resurfacing works, and contractor traffic-management arrangements.

The EIAR indicates that construction is expected to commence in Q2 2027 and that design, construction, and commissioning activities would last approximately 18 months. The EIAR traffic chapter identifies the construction period as the phase when perceptible impacts on the local transport network are expected. It also identifies additional construction trips and temporary road restrictions associated with the underground grid connection as the primary construction-stage traffic issues.

12.3 Policy context: Athenry LAP, GCDP, GTS, RSES and national sustainable mobility policy

The Athenry Local Area Plan 2024-2030 is a statutory plan for the town and is accompanied by a Local Transport Plan. The LAP and Local Transport Plan place clear emphasis on sustainable mobility, walking, cycling, permeability, public transport integration, traffic calming, footpath improvements, and safe access within and around Athenry. The Athenry Local Transport Plan identifies L3103-related active travel measures, including footpath upgrades, traffic calming, and formal crossing points, with the stated objective of improving pedestrian safety and comfort.

The Galway County Development Plan 2022-2028 and the Galway County Transport and Planning Strategy / Galway Transport Strategy also support an integrated approach to land use and transport. The GCDP recognises the importance of the public road network for the safety of road users, the transport of goods and services, and connectivity between settlements and

the wider region. The transport strategy includes traffic management, priority for walking, cycling, and bus movements, modifications to the traffic network, management of parking and heavy goods vehicles, improvements to the public realm, and smarter mobility.

Relevant GCDP and transport objectives include, but are not limited to, objectives for the Galway County Transport and Planning Strategy and Galway Transportation Strategy, integrated land use and transport planning, walking and cycling, greenways and blueways, public transport, non-national roads, and climate change. These include policy areas such as GCTPS1, GCTPS2, GCTPS3, GCTPS4, GCTPS6, GCTPS7, GCTPS9, GCTPS10, ILUTP1, WC1, WC2, WC3, WC4, WC5, GBW2, PT9, NNR5, NNR6, NNR7, CC1, CC2, CC6, CC8 and RE7, to the extent that they are relevant to construction traffic, active travel, road safety, mobility, climate and access.

At regional level, the Northern and Western Regional Spatial and Economic Strategy 2020-2032 provides the framework for strategic development in the Northern and Western Region, including County Galway. The RSES supports implementation of the National Planning Framework and emphasises proper planning, sustainable development, effective regional development, healthy places and sustainable communities.

At national level, the National Planning Framework and National Sustainable Mobility Policy seek to support compact, sustainable growth, reduce car dependency, increase the proportion of sustainable journeys, and improve walking, cycling and public transport options. Climate Action Plan 2025 continues Ireland's roadmap to halve emissions by 2030 and achieve climate neutrality by 2050. Transport policy is therefore directly relevant where a proposed development may temporarily obstruct, discourage, or make unsafe a road corridor identified for active travel and sustainable mobility.

12.4 L3103 as an active travel and community access route

The L3103 should not be treated only as a rural vehicular link. It performs a wider local

movement function for Athenry and its surrounding communities. It connects rural households, businesses, agricultural lands, and community facilities to Athenry and to the wider regional road network. It is also a route on which walking, running, cycling and other non-motorised movements occur, particularly where alternative segregated infrastructure is absent.

The EIAR itself recognises that the local road network in the study area is predominantly rural, with no segregated pedestrian or cyclist facilities, narrow grass verges and roadside boundaries. It also recognises that walkers, cyclists and horse riders are likely to use the local roads in the absence of formal non-motorised routes. This is an important acknowledgement because, on such roads, construction traffic and temporary traffic management can have a disproportionate effect on vulnerable road users even where ordinary vehicular capacity is not exceeded.

The Athenry LAP / Local Transport Plan gives the L3103 an additional future-baseline significance. A route that may currently lack a high-quality active travel facility is nonetheless part of an adopted plan to improve walking, cycling, pedestrian safety, footpaths, crossings, and sustainable mobility. The assessment should therefore consider not only the current baseline condition of the L3103, but also its planned function under the LAP and Local Transport Plan.

12.5 Athenry Athletics Club and community/sporting facilities

Athenry Athletics Club has its running track and sports field a short distance to the north-west of the proposed site area and is accessed from the Athenry side using the L3103 and adjoining local road network. The wider area also includes Athenry Association Football Club and other recreational/community facilities. The EIAR identifies Athenry Athletics Club and Athenry Association Football Club as community receptors in the wider area.

Sporting facilities are not simply discretionary leisure destinations. They are health-promoting community infrastructure. They support youth sport, adult exercise, social participation, mental well-being, volunteer activity, community identity, and public health. Access disruption,

perceived danger, increased HGV movements, road narrowing, construction traffic, traffic delays, altered routes, and uncertainty may reduce use of these facilities during construction, particularly by children, parents, older users, runners, walkers, cyclists, and those without access to private cars.

The EIAR appears to identify these facilities as receptors but does not appear to provide a facility-specific access assessment for Athenry Athletics Club or Athenry Association Football Club. In particular, it does not appear to assess training times, competition days, evening/weekend use, youth access, pedestrian/running/cycling movements, parking interaction, or the combined effects of construction traffic, traffic management, and existing sports-facility traffic.

12.6 Short-term impacts on sustainable mobility objectives

The short-term construction impacts on the L3103 are relevant to the implementation of the LAP, Local Transport Plan, GCDP, GTS/GCTPS, RSES, and national sustainable mobility policy. These impacts include temporary obstruction, temporary road narrowing, stop/go controls, resurfacing works, increased HGV movements, construction worker trips, abnormal-load movements, reduced road comfort, reduced pedestrian and cyclist safety, perceived danger, and temporary severance.

A capacity-based traffic assessment is not sufficient to address these impacts. A road may continue to operate in vehicular capacity terms while simultaneously becoming unsafe or unattractive for pedestrians, cyclists, runners, children, older people, disabled users, sports users, and people seeking to access Athenry by non-car modes. The relevant policy question is not only whether cars and HGVs can continue to pass, but whether the L3103 can continue to perform its existing and planned active travel and community access functions during construction.

The proposed works are therefore capable of creating the following short-term policy conflicts:

- Discouraging walking, cycling, and running on a road corridor identified for active travel and pedestrian improvements.
- Reducing perceived and actual safety for vulnerable road users on a road with limited existing segregation.
- Increasing short-term car dependency where local policy seeks to shift trips toward walking, cycling, and public transport.
- Interfering with safe access to community and sporting facilities, including Athenry Athletics Club and Athenry Association Football Club.
- Creating uncertainty for residents and road users about when and how the L3103 can be safely used.
- Introducing construction traffic and HGV activity onto a corridor where public policy is seeking to improve active travel conditions.
- Potentially delaying, conflicting with, or prejudicing planned active travel, footpath, crossing, or traffic-calming improvements unless coordinated with Galway County Council and relevant transport bodies.

12.7 Human health implications

The human-health impacts of the proposed construction works should be assessed in practical terms. Walking, running and cycling are not only transport modes; they are also health behaviours. They support physical activity, mental well-being, independence, social interaction, and community participation. Short-term restrictions or perceived danger on the L3103 may therefore have public-health consequences, particularly for those who use the route to access sport, school, local services, employment, farms, businesses, community facilities, health services, or Athenry town.

The EIAR's Population and Human Health chapter recognises that vulnerable groups require specific attention, including people who are elderly, disabled, physically or mentally

disadvantaged, materially disadvantaged, families with children and adolescents, and people with health problems or impairments. It also recognises that access disruption, journey delays and diversions can be anxiety-inducing, particularly where road users are unaware of the works, diversions or closures.

However, the EIAR scopes physical activity out as a wider health determinant on the basis that there are no dedicated active travel routes in the area and that ad hoc active travel is addressed under transport. That approach is inadequate where the L3103 has an adopted future function as part of the Athenry active travel and footpath upgrade network. The absence of current segregation should not be used as a reason to minimise the health significance of walking, cycling or running. In fact, the absence of segregation makes vulnerable road users more exposed to construction traffic and traffic-management impacts.

The short-term human-health impacts requiring assessment include:

- Reduced physical activity if residents, athletes, children, parents, or community users avoid walking, cycling, or running because of construction conditions.
- Increased stress, anxiety, and uncertainty caused by traffic management, altered access, delays, and perceived danger.
- Increased road-safety risk or perceived risk for vulnerable road users on a road with limited segregated infrastructure.
- Potential inequitable impacts on people who cannot drive, do not have access to a car, rely on lifts, or depend on walking/cycling for short local trips.
- Potential reduction in participation at Athenry Athletics Club and other sports/community facilities during the construction period.
- Potential difficulty for older people, disabled users, children, and carers in safely navigating temporary traffic arrangements.

12.8 Weakness in the EIAR assessment

The EIAR contains several acknowledgements that support the need for a stronger assessment. It identifies the L3103 as part of the underground grid connection route and as the proposed access route to the main project site. It recognises that the local roads are used by walkers, cyclists and horse riders in the absence of formal non-motorised routes. It also recognises that local residents and businesses use these roads for access and that disruption may affect community assets.

Despite this, the EIAR appears to assess the L3103 principally in traffic and capacity terms. It appears to give insufficient weight to the L3103's planned role under the Athenry LAP / Local Transport Plan and to its community-health role as an access route for sports, walking, running, and cycling.

A further weakness is that the EIAR states that cumulative effects with the Athenry Local Area Plan 2024-2030 are not anticipated because the proposed project is not within the area covered by the LAP and is approximately 1 km from lands zoned within the plan. That is too narrow. A development outside the LAP boundary can still materially affect delivery of LAP transport objectives if it uses, excavates, narrows, restricts, resurfaces, damages, or discourages use of a road corridor that serves Athenry and is identified in the Local Transport Plan for sustainable mobility improvements.

The assessment should therefore be widened to consider the L3103 as part of Athenry's functional movement and active-travel network, not merely as a rural road link adjacent to a development site.

12.9 Potential inconsistency with adopted planning, transport and climate objectives

A temporary construction impediment does not automatically amount to a legal contravention of the Athenry LAP, GCDP, GTS/GCTPS, RSES, NPF, or Climate Action Plan. However, the proposed development risks being inconsistent with, and potentially contrary to, their

sustainable mobility, road safety, active travel, human health, and climate objectives unless strict mitigation is imposed.

The development would be particularly difficult to reconcile with adopted policy objectives if it:

- Fails to protect safe pedestrian, cyclist, runner, and vulnerable road-user access on the L3103 during construction.
- Assesses the L3103 only by vehicular capacity and not by its active-travel, community-access, and human-health function.
- Fails to coordinate with planned L3103 footpath, traffic-calming, crossing or cycle improvements.
- Increases short-term car dependency without providing equivalent temporary safe walking and cycling arrangements.
- Disrupts access to Athenry Athletics Club and other community/sporting facilities without facility-specific mitigation.
- Fails to consider the L3103's role in delivering sustainable mobility and climate objectives for Athenry and the surrounding area.

The stronger and more balanced conclusion is that the proposed works would be inconsistent with the sustainable mobility, active-travel, road-safety, human-health, and climate objectives of the Athenry LAP, GCDP, GTS/GCTPS, RSES, NPF, and Climate Action Plan unless an enforceable, route-specific mitigation plan is required before construction.

12.10 Required mitigation: L3103 Active Travel, Road Safety and Community Access Plan

The applicant should be required to prepare a specific L3103 Active Travel, Road Safety and Community Access Plan before any construction access works, road opening, underground cable works, resurfacing, HGV routing, abnormal-load movement or temporary traffic

management affecting the L3103 commence. This plan should be separate from, or a clearly identifiable annex to, the Construction Traffic Management Plan.

The plan should include the following measures:

11. A policy-consistency statement demonstrating how the works will comply with the Athenry LAP 2024-2030, Athenry Local Transport Plan, GCDP 2022-2028, GCTPS/GTS, RSES, National Planning Framework, National Sustainable Mobility Policy, and Climate Action Plan.
12. Confirmation from Galway County Council and, where relevant, the National Transport Authority, that the works will not delay, obstruct, prejudice or conflict with planned L3103 footpath, traffic-calming, crossing, cycle or other active-travel improvements.
13. A detailed construction phasing programme showing how L3103 works, site access, resurfacing, HGV deliveries, worker traffic and abnormal-load movements will be managed without undermining active travel or community access.
14. A vulnerable road-user management plan for pedestrians, cyclists, runners, children, older people, disabled users, horse riders, sports-facility users, and those without access to private cars.
15. Safe temporary walking and cycling arrangements for each phase of works, not merely vehicular stop/go arrangements.
16. Facility-specific consultation with Athenry Athletics Club, Athenry Association Football Club, local schools, residents, businesses, farms, and community groups.
17. Measures to protect access during club training times, competition/event days, school travel peaks, community events, funerals, and other sensitive times.
18. A road safety audit and mobility audit of all temporary traffic-management arrangements affecting the L3103.

19. A commitment that no part of the L3103 will be left in a condition that worsens walking, cycling, running, crossing safety, footpath condition, drainage, verge condition, lighting, surfacing or accessibility after reinstatement.
20. A complaints, incidents and near-miss log, including incidents involving pedestrians, cyclists, runners, vulnerable users, sports users, HGVs and construction vehicles, with reporting to Galway County Council and prompt corrective action.

12.11 Summation

The L3103 is not merely a local construction access road. It forms part of the functional movement network serving Athenry and is identified in the Athenry LAP / Local Transport Plan as part of the active travel, footpath, crossing, and traffic-calming improvement network. The proposed development will rely on this road for construction access, underground cable works, worker traffic, HGV movements, abnormal-load movements, temporary traffic management, and resurfacing works.

The EIAR assesses the L3103 largely in vehicular capacity and temporary traffic-management terms. This is inadequate for a road corridor which is intended to support sustainable mobility, walking, cycling, community access, and public health. The relevant question is not simply whether vehicles can continue to pass; it is whether the road can continue to function safely for pedestrians, cyclists, runners, sports users, vulnerable road users, residents, farms, and businesses during construction.

The EIAR itself recognises that local roads in the study area lack segregated pedestrian and cyclist facilities and are likely to be used by walkers, cyclists and horse riders. It also recognises Athenry Athletics Club and Athenry Association Football Club as community receptors in the wider area. However, it does not appear to provide a facility-specific assessment of access to these sports facilities or an adequate assessment of the implications for the L3103's planned active-travel

function under the Athenry LAP / Local Transport Plan.

The applicant's conclusion that cumulative effects with the Athenry LAP are not anticipated because the main project site is outside the LAP area is too narrow. The project affects roads serving Athenry and roads identified for sustainable mobility improvements. A development outside the LAP boundary can still materially affect delivery of LAP transport objectives where it uses, excavates, narrows, resurfaces or temporarily impedes an active travel route serving the town.

The proposed works would therefore be inconsistent with the sustainable mobility, active travel, road safety, human health, and climate objectives of the Athenry LAP, GCDP, GTS/GCTPS, RSES, NPF, and Climate Action Plan unless strict mitigation is imposed. A specific L3103 Active Travel, Road Safety and Community Access Plan should be required before any works commence.

12.12 Suggested planning condition

No works affecting the L3103, including construction access works, road opening, underground cable installation, resurfacing, abnormal-load movement, HGV routing, or temporary traffic management, shall commence until an L3103 Active Travel, Road Safety and Community Access Plan has been submitted to and agreed in writing with Galway County Council.

The plan shall demonstrate consistency with the Athenry Local Area Plan 2024-2030, Athenry Local Transport Plan, Galway County Development Plan 2022-2028, Galway County Transport and Planning Strategy, Galway Transport Strategy, Northern and Western Regional Spatial and Economic Strategy, National Planning Framework, National Sustainable Mobility Policy, and Climate Action Plan.

The plan shall include safe temporary arrangements for pedestrians, cyclists, runners, vulnerable road users and sports-facility users; consultation with Athenry Athletics

Club, Athenry Association Football Club, affected residents, schools, farms and businesses; coordination with any planned L3103 active travel, footpath, traffic-calming, crossing or cycle works; a road safety audit and mobility audit; advance notification procedures; and monitoring of complaints, incidents and near-misses. No works shall proceed unless safe access for active travel users and community facilities can be maintained at all times.

12.13 Conclusion

The proposed development would have short-term impacts on the L3103 during construction through site access, underground cable works, traffic management, HGV movements, resurfacing, worker traffic, and abnormal-load movements. These impacts should not be assessed only by reference to vehicle capacity or temporary inconvenience.

The L3103 is part of the movement network serving Athenry and is identified in the Athenry LAP / Local Transport Plan as part of the planned active travel and sustainable mobility framework. It also provides access to community and sporting facilities, including Athenry Athletics Club and Athenry Association Football Club, and is used by residents, businesses, farms, and vulnerable road users.

The EIAR appears to underestimate this policy and human-health context. In particular, the scoping out of physical activity, the limited treatment of active travel, the absence of a facility-specific assessment for sports/community access, and the narrow dismissal of Athenry LAP cumulative effects all point to a weakness in the assessment.

The development should therefore be regarded as potentially inconsistent with the LAP, GCDP, GTS/GCTPS, RSES, NPF, and national climate/sustainable mobility objectives unless the applicant is required to prepare and implement a robust L3103 Active Travel, Road Safety and Community Access Plan before works commence.

12.14 References

Cashla Peaker Plant Environmental Impact Assessment Report (EIAR), Volume 2, Bord Gais Energy Ltd., February 2026. Relevant sections include Chapter 1 (Introduction and Methodology), Chapter 2 (Project Description), Chapter 4 (Population and Human Health), Chapter 10 (Traffic and Transportation), Chapter 16 (Cumulative Impacts), and Chapter 18 (Schedule of Environmental Commitments).

Athenry Local Area Plan 2024-2030 and Athenry Local Transport Plan, Galway County Council. Official source: <https://www.galway.ie/>

Galway County Development Plan 2022-2028 and Galway County Transport and Planning Strategy / Galway Transport Strategy, Galway County Council. Official source: <https://www.galway.ie/>

Northern and Western Regional Spatial and Economic Strategy 2020-2032, Northern and Western Regional Assembly. Official source: <https://www.nwra.ie/rses/>

National Planning Framework / Project Ireland 2040, including First Revision where relevant. Official sources: <https://www.npf.ie/> and <https://www.gov.ie/>

National Sustainable Mobility Policy, Department of Transport. Official source: <https://www.gov.ie/en/department-of-transport/publications/national-sustainable-mobility-policy/>

Climate Action Plan 2025, Department of Climate, Energy and the Environment. Official source: <https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/climate-action-plan-2025/>

Chapter 13: Transport Infrastructure Ireland and Galway County Council: Road Network, Motorway Safety, Grid Connection Maintenance

13.1 Introduction and Summary of Objection

Transport Infrastructure Ireland's (TII) submission materially strengthens our objection to this development because it confirms that this is not a simple local road access issue. The selected Rathmorrissy site creates a complex road-network, motorway-interface, and grid-connection problem involving abnormal loads, three horizontal directional drilling motorway crossings, long-term cable maintenance risks, finite local road space, possible interaction with the Gannow Windfarm grid route, and unresolved road safety matters as raised in previous chapters.

The road and transport issues are not peripheral to the development. The proposed power plant cannot operate as intended without the grid connection, and the grid connection cannot be delivered without substantial interaction with local roads, motorway reservations, road structures, bridges, culverts, public-road margins, joint bays and traffic management measures. These are therefore material planning, environmental, health and safety considerations.

The central objection is that the selected site has created avoidable infrastructure complexity. A site west of the motorway and closer to Cashla Substation would likely reduce cable length, reduce the need for motorway HDD crossings, reduce disturbance of local roads, reduce joint-bay impacts, reduce long-term road-opening and maintenance risks, and reduce the cumulative burden on local residents, as previously stated. The application and EIAR do not adequately assess that alternative as part of a total-project comparison.

13.2 TII Confirms Outstanding Road Maintenance and Safety Issues

TII acknowledges that the proposal may contribute to energy security and the transition to a low-carbon and climate-resilient economy. However, TII also makes clear that the proposal must be assessed against official policy concerning national road network maintenance and safety, including the need to maintain the strategic capacity and safety of the national road network.

Although TII notes that the application documentation does not indicate a direct access requirement

onto the national road network in the first instance, it identifies a number of operational issues requiring consideration. These concern national road network maintenance, road safety, abnormal and exceptional abnormal loads, motorway HDD crossings, reinstatement of national road assets, external lighting, and safeguarding of motorway reservations.

This is important because it rebuts any suggestion that road impacts are merely local, short-term, or capable of being left to routine post-consent arrangements. TII's intervention demonstrates that the selected site creates direct planning and safety implications for strategic road infrastructure.

13.3 Exceptional Abnormal Loads and Structural Safety

TII states that any operator transporting a vehicle or load outside the limits allowed by the Road Traffic (Construction, Equipment and Use of Vehicles) Regulations 2003 must obtain permits from each local authority through whose jurisdiction the vehicle will travel. TII further states that all national road structures on the proposed haul route should be checked by the applicant/developer to confirm that they can accommodate the proposed loading associated with delivery of development components where the weight of the vehicle and load exceeds that permissible under the Road Traffic Regulations.

TII identifies that an abnormal load is anything above 46 tonnes and below 180 tonnes, while any load above 180 tonnes is an Exceptional Abnormal Load. TII states that all structures to be crossed by an Exceptional Abnormal Load require a full structural assessment by the developer in accordance with TII Publications AM-STR-06048 to verify that they can sustain the load safely and without damage.

The application documentation identifies three exceptional abnormal loads associated with the proposed development:

Component	Component Weight Identified in Application
Gas turbine	360 tonnes
Generator	380 tonnes
Step-up transformer	288 tonnes

TII expressly notes that these individual component weights do not include the weight of the transport vehicles. Therefore, the actual loading on associated road structures will be significantly greater than the component weights stated in the application. This is a material safety issue. The EIAR cannot rely on broad or generic haul-route management commitments when the safe movement of components

weighing hundreds of tonnes, before vehicle weight is included, is essential to the development.

The Commission should therefore require a complete abnormal-load and exceptional-abnormal-load assessment before any decision is made. This should include final haul route confirmation, bridge and culvert structural assessments, accommodation works, junction works, swept-path analysis, Garda escort requirements, local authority permits, and a clear assessment of the implications for local residents and road users.

13.4 TII States the Applicant's Proposed Abnormal-Load Condition Is Insufficient

A particularly important point is that TII does not consider the applicant's proposed condition for abnormal and exceptional abnormal loads to be sufficient. TII requests stronger wording requiring an Abnormal Load and Exceptional Abnormal Load Management Plan. The plan is to confirm the final haul route, pre- and post-delivery condition surveys of the public road network, including bridges and culverts where required, necessary accommodation works, traffic management measures, statutory permits, and Garda escort arrangements.

TII also requests that, before the first delivery of any exceptional abnormal load, the permitting process required under Department of Transport Circular RW18 of 2024 be completed to the satisfaction of the planning authority. This confirms that essential transport and public-safety matters remain unresolved at the planning stage.

The Commission should not treat these matters as minor post-consent technical details. They affect road safety, structural safety, emergency access, the integrity of public infrastructure, and the practicability of the selected site. If the abnormal-load route requires significant accommodation works, road strengthening, junction alteration, or bridge/culvert constraints, those impacts must be assessed as part of the EIA and public-participation process.

13.5 Road Repair, Reinstatement and Long-Term Cable Upkeep

TII states that all national road and ancillary overground and underground assets must be properly reinstated and properly certified to the relevant standards in accordance with the assets' functions and required working widths and depths. TII also states that any damage caused to the pavement of the

existing national road by abnormal-load turning movements, including tearing of the surface course, must be rectified in accordance with TII Pavement Standards, with details agreed with the Road Authority before development commences.

This supports our observations in Chapter 9, which point out that road repair, reinstatement, and road upkeep have not been adequately assessed over the lifetime of the grid connection. TII addresses reinstatement and repair arising from construction and abnormal-load damage, but the EIAR does not adequately assess the long-term road-opening and reinstatement burden caused by the underground 220 kV grid connection itself.

The cable is not a temporary infrastructure. It is critical electricity infrastructure intended to remain in place for the project's operational life and likely beyond. If the cable is thermally constrained, overheats, is derated, develops faults, or requires thermal remediation, the public road network may have to be reopened at joint bays, duct transition points, road sections, HDD launch and reception areas, or other thermally weak sections. Such works would cause repeated disruption to residents, farms, businesses, school journeys, work journeys, local services, and emergency access.

Accordingly, the Commission should not assess road repair merely as a once-off construction reinstatement matter. The proper planning assessment must include long-term cable maintenance, future road openings, fault access, reinstatement responsibilities, road asset protection, emergency response, and cumulative impacts on the community over the lifetime of the development. The inconvenience to local residents and homeowners who may be impacted by such repairs must be considered.

13.6 Three Motorway HDD Crossings Are Material Planning and Safety Constraints

TII confirms, as raised in previous chapters, that the proposed grid connection to Cashla 220 kV Substation involves three motorway crossings: one crossing of the M18 parallel to local road L3103, and two crossings of the M6 parallel to local roads L7109 and L7108. All three crossings are proposed by horizontal directional drilling.

These crossings are not routine or incidental. TII states that the proposed HDD crossings require consent under Section 53 of the Roads Act. Other consents may also be required, including local authority consent, licensing, or arrangements for third-party access to the national road network. TII

also states that contact should be made with thirdpartyworks@tii.ie to progress any HDD motorway crossing, and that consultation should take place with relevant PPP companies, MMaRC contractors and local road authorities.

TII's general requirements for directional drilling under a motorway include that launch and reception pits must be outside the motorway boundary, the cabling must be installed at a depth that does not conflict with motorway drainage, neither the works nor the cable crossing may damage or interfere with the motorway, future maintenance and upgrades must be capable of being carried out without access to the motorway boundary, there must be no bolted joints within the motorway fence-line, and pre- and post-construction surveys are required over the extents of the motorway boundary.

These requirements demonstrate that the HDD crossings create permanent constraints, not merely short-term construction considerations. If a future cable fault, overheating issue, duct failure or thermal remediation requirement arises at or near a motorway crossing, the consequences for maintenance access, cost, public disruption and road safety are materially different from an ordinary field or local road section.

This reinforces the Chapter 9 objection point that the EIAR should have assessed long-term cable thermal performance, HDD maintenance access, fault response, cable replacement feasibility and future road-opening consequences before consent. A post-consent condition would not cure the assessment deficiency because the public and the Commission would have been denied the opportunity to consider the actual implications of the motorway-interface works before permission is granted.

13.7 Safeguarding the M6, M17 and M18 Motorway Reservations

TII states that it has not provided consent for any works within the motorway reservation and that, based on the information accompanying the application, all proposed works appear capable of being executed outside the motorway reservation. TII requests a condition clarifying that any permission does not approve or imply consent for any works within the M6, M17 or M18 motorway reservations.

This is significant because the red-line planning application boundary adjoins the M6, M18 and M17 motorway reservation boundaries. The Commission should be extremely cautious in granting permission where the proposal relies on infrastructure works at, beside and beneath strategic motorway

assets, but where TII has not consented to works within the motorway reservation and where future maintenance access must avoid the motorway boundary.

The need for a specific safeguarding condition further demonstrates that the selected site is constrained by the motorway network. It is not sufficient for the applicant to present proximity to the motorway and nearby infrastructure as an advantage without also assessing the construction, safety, maintenance and consent difficulties created by that location.

13.8 External Lighting, Glare and Road-User Safety

TII raises a specific road-safety concern regarding external lighting. It requests a condition requiring all external lighting to be designed, installed and maintained so as to avoid glare, overspill or potential distraction to road users on the adjoining motorway network. TII further requests that lighting be directed and cowled where required, and that monitoring and subsequent modification be provided where glare, overspill or distraction arises.

This aligns with Galway County Council's Roads and Transportation comments, which require the Traffic and Transport Assessment to assess indirect adverse impacts on road safety, including the impact of the proposed 20 m public lighting mast and the absence of lux contouring reports and glare assessments.

Lighting is therefore not merely a visual amenity issue. It is a health-and-safety issue for road users on high-speed motorway infrastructure and on local roads. The absence of sufficient lux contouring, glare and distraction assessment is a material omission in the application.

13.9 Galway County Council Confirms Missing Road Safety Information

Galway County Council's Roads and Transportation Department raises separate but complementary concerns. The Council states that sightlines and stopping sight distances for the substation development entrance have not been demonstrated. It requires revised drawings and longitudinal details on a topographical survey to demonstrate that 90 metre sightlines and stopping sight distances can be achieved at the proposed permanent substation entrance. The clear sightline triangle is to be assessed from 2.4 metres back from the road edge.

Galway County Council also states that reducing hedge heights is not acceptable because through-road users must be able to see the form of the new junction for the full sightline distance. Stationary objects, including overhead service poles, must be set back behind the sightline envelope. The vertical envelope of visibility/intervisibility has also not been demonstrated in accordance with TII standards.

The Council further states that there is no recommended Stage 1/2 Road Safety Audit reflecting the entire scheme, including new vehicular accesses onto the public road network and the significant scale of roadside interventions proposed. It also states that the applicant has not submitted a detailed Traffic and Transport Assessment in accordance with TII publication PE-PDV-02045.

Taken together with TII's submission, these comments demonstrate a serious health-and-safety deficiency. Galway County Council identifies missing sightline, stopping-distance, forward-visibility, Road Safety Audit and Traffic and Transport Assessment information. TII identifies unresolved abnormal-load, motorway-safety, HDD, lighting, repair and reinstatement issues. These are material deficiencies in the planning assessment, not matters that can safely be deferred to later agreement.

13.10 Joint Bays, Sterilisation of Local Roads and Future Maintenance Conflict

Galway County Council raises a particularly strong concern regarding the proposed grid connection joint bays. It states that ten joint bay layouts are proposed within the public road carriageway. The joint bays are described as approximately 8 metres long and 2.5 metres wide, with communications ducting and a C2 communications precast chamber located externally to this footprint at approximately 1.85 metres below road level.

Galway County Council states that the scale of this infrastructure would effectively sterilise the public roadway. It says this would prevent the Council from carrying out essential future works, including drainage upgrades, installation or extension of Group Water Scheme mains, and provision or alteration of house service connections.

The Council requires that joint slabs be relocated off the public road and positioned within adjacent lands under the applicant's control. It also states that the applicant has not demonstrated that no off-carriageway alternative is practical, nor has it demonstrated the feasibility of placing joint slabs within strategic passing bays.

This concern is directly connected to the long-term maintenance issue. Joint bays are not merely temporary construction features. They are likely future access and maintenance points for the cable system. Locating them within narrow public roads creates a long-term conflict between private/project infrastructure and public-road management, drainage, water services, house connections, emergency access and future community needs.

13.11 Gannow Windfarm Interaction and Cumulative Road-Closure Burden

TII notes that the Cashla Peaker Plant grid connection and the Gannow Windfarm application both propose grid connections to Cashla 220 kV Substation and appear to use the same sections of local road in some instances. TII states that clarification may be necessary to demonstrate that both proposals can be accommodated in finite road space where proposed grid connection routes interact. TII also notes that opportunities to coordinate proposals may be available to ensure deliverability and mitigate impact to the road network.

This point must be treated carefully. Coordination may reduce duplicated excavation, but it may also extend disruption, intensify construction activity, lengthen road closures and increase the cumulative burden on the same community. The fact that TII refers to finite road space confirms that this is not a theoretical concern.

TII also notes that the Gannow Windfarm application proposes only one motorway crossing, whereas the Cashla Peaker Plant proposes three separate HDD motorway crossings. This comparison is important because it highlights the greater motorway-interface complexity created by the selected Peaker Plant site and grid route.

The EIAR should assess the cumulative and coordinated-construction scenario, including whether combined works would prolong road closures, worsen diversions, extend disturbance for residents, or create longer periods of restricted access for farms, homes, services and emergency vehicles. It is not sufficient to assume that coordination automatically reduces impact.

13.12 Reasonable Alternatives and the West-of-Motorway Site Issue

The road evidence supports a broader site-selection objection. The selected Rathmorrissey/Pollnagroagh

site is not simply close to infrastructure. It is located in a position that forces the project to interact repeatedly with sensitive road infrastructure, motorway reservations, local road corridors, bridge and culvert constraints, joint bays, HDD crossings and future cable maintenance issues.

A site west of the motorway and closer to Cashla Substation would likely reduce the length of underground cable required, reduce the extent of public road disturbance, reduce the number and extent of joint bays, reduce excavation and imported backfill, reduce HDD requirements, reduce interaction with motorway reservations and reduce long-term road-opening maintenance risk.

The application does not adequately compare the selected site against a west-of-motorway or shorter-grid-connection alternative by reference to total-project impacts. Such an assessment should consider cable length, road disruption, HDD complexity, motorway consent, abnormal-load access, road reinstatement, cable maintenance, karst and ground conditions, future road openings, cumulative impacts with Gannow Windfarm, and the burden on local residents.

The Commission cannot be satisfied that the selected site is the least environmentally damaging or most sustainable option where the road, motorway, HDD and long-term cable maintenance consequences of the selected route have not been fully assessed.

13.13 EIA and Public Participation Deficiency

The unresolved road and grid-connection matters are not suitable for deferral to post-consent conditions alone. The public and the Commission must be able to assess the environmental and health-and-safety consequences of the actual project before consent is granted.

Where essential details remain unresolved, including abnormal-load route structural capacity, road safety audit outcomes, traffic and transport impacts, HDD maintenance constraints, joint-bay relocation feasibility, lighting/glare impacts and long-term cable maintenance road openings, the EIAR does not provide a complete basis for informed public participation or decision-making.

The Commission should therefore either refuse permission or require further information and public consultation before any decision. A condition requiring the applicant to resolve these matters after permission would not cure the defect because the assessment of reasonable alternatives, road safety, public health, maintenance impacts and cumulative disruption would already have been bypassed.

13.14 Requested Findings and Further Information

The Commission is requested to find that the EIAR and application documentation are deficient in their assessment of road safety & maintenance, abnormal loads, motorway-interface works and long-term grid-connection maintenance impacts.

The Commission is further requested to find that the applicant has not demonstrated that the selected Rathmorrissy/Pollnagroagh site is preferable to a site west of the motorway and closer to Cashla Substation when total-project impacts are properly considered.

Before any decision is made, the applicant should be required to submit the following information for public consultation and assessment:

- a full abnormal-load and exceptional-abnormal-load route assessment, including structural assessment of bridges and culverts and final haul-route confirmation;
- pre- and post-construction road condition survey proposals for all affected roads, bridges, culverts and road assets;
- a Stage 1/2 Road Safety Audit covering the entire scheme, including all accesses and roadside interventions;
- a completed Traffic and Transport Assessment in accordance with TII guidance;
- a detailed assessment of the three motorway HDD crossings, including Section 53 consent pathway, drainage interaction, future maintenance and upgrade access, and fault-response implications;
- a lighting, lux contouring and glare assessment addressing motorway and local road-user safety;
- a joint-bay relocation assessment demonstrating why joint bays and slabs cannot be located off the public carriageway;
- a cumulative road-impact assessment addressing interaction with the Gannow Windfarm grid connection and any coordinated works scenario;

- a long-term road-opening, cable maintenance and road-reinstatement assessment for the 220 kV cable over the lifetime of the project; and
- a comparative alternatives assessment of a shorter grid connection and a site west of the motorway closer to Cashla Substation.

In the absence of this information, the Commission should refuse permission or, at minimum, require further information before any decision is made. The issues identified by TII and Galway County Council go to road safety, public health, strategic road capacity, long-term road maintenance, cable reliability, emergency access and the adequacy of the site-selection assessment.

13.15 References

Transport Infrastructure Ireland, letter to An Coimisiún Pleanála, 23 April 2026, TII Ref. TII26-135457, regarding ACP case ref. PA07.324113.

Galway County Council, Report as required by Section 37E(4)-(7) of the Planning and Development Act 2000, An Coimisiún Pleanála Reference ACP-324113-26, including Roads and Transportation Department comments and recommended conditions.

Observer draft Chapter 9: Soil Thermal Resistivity, EPA/GSI Soil Evidence, HDD Crossings and Long-Term Cable Maintenance Impacts, Cashla Peaker Plant / 220 kV Underground Grid Connection to Cashla Substation.

Cashla Peaker Plant EIAR, Volume 2, including Chapters 2, 4, 9, 10, 11, 12, 16 and 17, as referred to in the Council and observer materials.

CHAPTER 14

Assessment of Galway County Council Planning Authority Report on the Grid Connection with Regard to Population, Human Health, Noise, Light and Safety

14.1 Purpose and Scope of this Objection

This chapter relates to the manner of assessment of the grid connection section of the proposed development by Galway County Council's Planning Authority report and how it has treated the grid connection in relation to population, human health, residential amenity, noise, lighting, sleep disturbance, stress, public safety, and road safety.

The chapter has been assessed to focus on the direct and indirect human-health and safety effects arising from the approximately 8.1 km 220 kV underground grid connection, the associated substation works, public road works, joint bays, horizontal directional drilling, construction traffic, temporary traffic management, lighting, construction noise, vibration, road closures and future maintenance access. The purpose is not to repeat a general policy argument about energy needs. The purpose is to show that the local population along the grid route must be treated as environmental and human-health receptors in their own right.

The grid connection is not a minor or neutral engineering detail. It is an essential component of the project and one of the longest physical construction elements. It passes through public road corridors and affects residents, farms, road users, emergency services, local access and potentially vulnerable persons. Galway County Council's report recognises that the EIAR contains chapters on population and human health, traffic, noise, water, material assets and major accidents, but the report does not bring those matters together into a clear receptor-based assessment of the grid route and the people living along it.

14.2 Core Objection

Objections to the assessment of the grid connection on the following grounds:

- Galway County Council's references to population are principally framed around county population growth, housing growth, economic growth and the need for energy security. That is not the same as assessing the local population as an environmental receptor affected by the grid route.
- The Council report does not provide a clear receptor-based assessment of residents, farms, schools, workplaces, road users, vulnerable receptors or households dependent on the local road network along the 8.1 km grid connection route.
- The Planning Authority did not adequately assess the human-health pathways arising from construction noise, vibration, temporary lighting, night-time light spill, glare, traffic management, road closures, joint bay works, HDD works, future maintenance works, sleep disturbance and stress.
- The Council report largely accepts the applicant's general conclusion that impacts are not significant and recommends conditions, rather than requiring further information on route-specific receptors, cumulative disturbance, sleep effects, stress effects and local access dependence.
- The Council's own Roads and Transportation comments identify unresolved road safety and lighting/glare issues, including the absence of a detailed Traffic and Transport Assessment, the absence of a Stage 1/2 Road Safety Audit, deficiencies in sightlines and stopping sight distances, and the need to assess public lighting, lux contours and glare. These matters are directly linked to human health and safety, yet they are not integrated into the population and human-health assessment.
- The Galway County Development Plan 2022-2028 contains specific policies on noise, light pollution, residential amenity, public roads and environmental protection. These policies

have not been given sufficient weight in the Planning Authority report when assessing the grid connection.

14.3 Galway County Council’s Treatment of Population is Too Broad and Policy-Led

Galway County Council’s Planning Authority report discusses population mainly in the context of the Galway County Development Plan Core Strategy, projected county population growth, housing requirements, economic growth and security of energy supply. That may be relevant to the applicant’s policy case, but it does not satisfy the separate requirement to assess the population likely to be affected by the development.

For EIA purposes, population and human health must be assessed by identifying the actual people and communities who may experience effects. In this case, that requires a route-based assessment of residents, one-off houses, farms, road users, vulnerable persons, local businesses, community facilities and daily access patterns along the grid route. It should include those who may be exposed to construction noise, vibration, lighting, glare, traffic disruption, road closures, diversions, emergency-access constraints and future road-opening works.

The EIAR itself identifies “noise and vibration” as a wider determinant of health and states that the population and human-health assessment benefits from the surveys undertaken for Chapter 9 Noise and Vibration. However, Galway County Council’s report does not demonstrate how those noise and vibration findings have been applied to the actual households and route communities affected by the grid connection. The report therefore does not translate the technical chapters into a meaningful planning assessment of lived human-health effects.

14.4 The Grid Route Creates a Distinct Human-Health and Safety Pathway

The grid connection is not confined to the main plant site. It involves works over a long linear

route, including trenching in public roads, joint bays, communications chambers, HDD works, temporary traffic management, road opening licences and possible road closures. Galway County Council's Roads and Transportation Department identified that joint bays are proposed within the public road carriageway and that there are significant unresolved issues relating to sightlines, stopping sight distances, road safety auditing and traffic and transport assessment.

These are not merely civil-engineering details. They are human-health and safety issues because they affect how residents sleep, travel, access work and school, receive healthcare, obtain emergency assistance, move livestock and machinery, and maintain daily routines. Repeated or prolonged uncertainty about road access, noise, night-time works, lighting, diversions and future maintenance can contribute to stress and anxiety, particularly for elderly residents, people with illness or disability, families with children, farms dependent on time-sensitive access, and households without alternative routes.

A lawful and balanced assessment should not treat the grid route as simply a cable in a road. It should assess the grid route as a temporary but significant construction corridor and as a long-term piece of critical infrastructure that may require future maintenance, road openings and emergency intervention.

14.5 Noise, Sleep Disturbance and Stress Require a Health-Based Assessment

The World Health Organization's Environmental Noise Guidelines for the European Region identify environmental noise as a public-health issue and provide recommendations intended to protect human health from environmental noise sources. The WHO Night Noise Guidelines for Europe identify sleep as a biological necessity and recommend an L_{night,outside} target of 40 dB to protect the public, including vulnerable groups such as children, the chronically ill and the elderly. The WHO material also recognises the link between night-time noise, sleep disturbance, stress responses and longer-term health effects.

This is directly relevant to the grid connection. Even where construction is described as temporary, temporary disturbance can still be significant where works occur close to dwellings, where works are repeated along a route, where traffic management creates uncertainty, or where residents experience early morning, evening or night-time disturbance. Construction noise, reversing alarms, generators, pumps, HDD equipment, joint bay works, road cutting, traffic diversions and heavy vehicles may all affect rest and sleep. The issue is not only measured decibels. It is also the duration, timing, character, intermittency and predictability of disturbance.

Galway County Council's report states that the EIAR predicts noise and vibration impacts to be within adopted criteria and that residual effects would be negative, slight to moderate and short term. That conclusion does not answer the route-specific human-health question. It does not identify the population along the grid route, does not assess sleep disturbance as a health outcome, does not identify vulnerable receptors, does not explain whether evening or out-of-hours works could occur, and does not address cumulative disturbance from other grid or road works. It does not account for night-shift workers.

The Planning Authority recommended a condition requiring a noise compliance monitoring programme before commencement and initial noise compliance monitoring within six months of commissioning. That is not an adequate substitute for a pre-consent route-based assessment of construction noise and sleep effects along the grid route. Monitoring after works have begun, or after commissioning, cannot repair an incomplete EIA if the affected receptors, night-time risk, and likely health effects have not been properly identified before consent.

14.6 Light Pollution, Sleep and Stress Were Not Adequately Assessed

Light is a recognised environmental factor affecting circadian rhythm and sleep. The health concern is not limited to visual glare or road safety. Artificial light at night can interfere with normal sleep patterns, particularly where lighting spills into bedrooms, where lighting is

intermittent or unexpected, or where residents are exposed to construction lighting, security lighting, vehicle headlights, public lighting masts or glare from temporary works areas.

The Galway County Development Plan 2022-2028 expressly recognises that the control of light pollution is important from several perspectives, including residential amenity, nature conservation, traffic safety, visual amenity, dark skies and climate/energy efficiency. Policy Objective LP 1 requires lighting schemes to be designed so that excessive light spillage is minimised and light pollution in the surrounding environment, including residential amenity, wildlife and near public roads, is limited. Policy Objective LP 3 encourages the maintenance of dark skies in rural areas and the limitation of light pollution in urban and rural areas.

The Planning Authority did not adequately apply these policies to the grid connection. The Council Roads and Transportation comments specifically identify the need to assess the impact of a 20 m public lighting mast, and refer to the absence of lux contouring reports and glare assessments. That is a direct planning and human-health issue. It should have been assessed not only as a road-safety issue but also as a residential amenity, sleep and stress issue, especially in a rural area where night-time darkness is part of the existing baseline.

The proper question is whether the total lighting associated with construction compounds, HDD works, road closures, traffic management, security, public lighting, substation operation and future maintenance could cause light spill, glare, bedroom intrusion, loss of dark-sky conditions, sleep disruption or stress for nearby residents. The Planning Authority report does not demonstrate that this question has been answered.

14.7 Galway County Development Plan Policies Support a Stronger Assessment

The Galway County Development Plan 2022-2028 does not support electricity and gas infrastructure at any cost. Chapter 7 Policy Objective EG 1 supports sustainable improvement and expansion of electricity infrastructure while taking account of landscape, residential,

amenity and environmental considerations. EG 2 supports electricity and gas transmission networks subject to environmental quality, landscape, wildlife, habitats and residential amenity. EG 4 supports Ireland's Grid Development Strategy while taking account of landscape, residential, amenity and environmental considerations.

The same chapter contains specific environmental-protection policies that are directly relevant to this objection. It states that noise can have a significant impact on the quality of life of individuals, communities, wildlife and the wider environment, and recognises that noise may be a nuisance or may endanger human health. Policy Objective NP 1 requires implementation of the Galway County Council Noise Action Plan to avoid, prevent and reduce harmful effects, including annoyance, due to environmental noise exposure. NP 3 requires assessment of the impact of development on noise levels. NP 4 restricts development proposals causing noise pollution in excess of best practice standards and regulates activities likely to give rise to excessive noise. NP 5 requires noise mitigation measures and monitors where appropriate.

For light pollution, Chapter 7 states that control of light pollution is extremely important from the perspectives of residential amenity, nature conservation, traffic safety, visual amenity, dark skies and climate/energy efficiency. Policy Objective LP 1 requires lighting schemes to minimise excessive light spillage so that light pollution in the surrounding environment, including residential amenity, wildlife and near public roads, is limited. LP 3 encourages the maintenance of dark skies in rural areas and the limitation of light pollution.

These Development Plan policies required Galway County Council to move beyond a general statement that noise and vibration effects would be slight to moderate and short term. They required a route-specific assessment of the grid works against residential amenity, public health, road safety, night-time disturbance, lighting spill, glare and dark-sky baseline. The report does not provide that balanced assessment.

14.8 Deficiencies in the Recommended Conditions

The Planning Authority recommends conditions concerning noise monitoring, dust and monitoring, and construction working hours. However, the conditions do not cure the assessment gap.

Condition 12 requires a noise compliance monitoring programme to be agreed before commencement, with initial noise compliance monitoring to be submitted within six months of commissioning. This is too late and too general for grid-route construction impacts. It does not identify the receptors along the 8.1 km grid route, the monitoring locations, the threshold values for construction noise, the treatment of night-time or evening works, the process for resident complaints, the protection of sleep, or the relationship with joint bay, HDD and traffic-management works.

Condition 13 is problematic because, although it is headed as a dust and monitoring condition, it uses wording referring to noise measurements and initial noise compliance monitoring. This indicates that the recommended condition may have been copied from the noise condition and has not been tailored to the actual environmental effect. A condition that is internally inconsistent should not be relied upon as mitigation for human-health impacts.

Condition 16 restricts construction hours to 0800-1800 Monday to Friday and 0800-1400 on Saturday unless otherwise agreed in writing with the Planning Authority. This does not address whether grid connection works, HDD works, cable pulling, abnormal loads, emergency works or road closures may occur outside those hours. Any power to agree exceptions after permission is granted should not be used to avoid pre-consent assessment of sleep disturbance, night-time light, stress and residential amenity effects.

14.9 Roads, Access, Safety and Stress Were Not Integrated with Human Health

The Council's Roads and Transportation Department identified important issues including lack

of demonstrated sightlines and stopping sight distances for the substation entrance, absence of a Stage 1/2 Road Safety Audit, absence of a detailed Traffic and Transport Assessment, the need to assess public lighting and glare, and the proposed location of joint bays within the public road carriageway. These are directly relevant to population and human health.

Road safety, access reliability and emergency access are health determinants. Where a rural community depends on narrow local roads, road closures and diversions can affect healthcare appointments, school access, work journeys, farm operations, deliveries, emergency response and the ability of residents to maintain normal daily life. The stress arising from uncertainty, repeated disruption and lack of clear access information should be assessed, particularly where the grid connection may overlap with other infrastructure projects using the same finite road space.

Galway County Council's Planning Authority report identifies some road issues but does not connect them to human health and safety. It does not assess whether the local population along the route has adequate resilience to prolonged roadworks, repeated daytime disturbance to shift workers, Mothers with newborns, persons at home with medical issues, temporary lighting, traffic diversions, loss of quiet enjoyment, or cumulative infrastructure works. This is a material omission.

14.10 Further Information Required Before Any Grant of Permission

Before any grant of permission, An Coimisiun Pleanála should require further information and public consultation on the grid connection's human-health and safety impacts. At minimum, the applicant should be required to provide:

- A receptor map and schedule for the full grid route, identifying dwellings, farms, vulnerable receptors, community facilities, businesses, local access points, emergency access dependencies and sensitive night-time receptors.

- A route-specific construction noise assessment addressing sleep disturbance, stress, timing, duration, reversing alarms, HDD works, joint bay works, generators, pumps, road cutting, heavy vehicles and cumulative works.
- A clear statement of whether any evening, night-time, early morning, weekend or emergency grid works may occur, including HDD works, cable pulling, traffic management, abnormal-load movements, reinstatement and future maintenance.
- A route-specific lighting and glare assessment including lux contour plans, temporary construction lighting, public lighting masts, security lighting, vehicle headlights, substation lighting, glare to road users, bedroom intrusion, dark-sky baseline and mitigation.
- An assessment of likely sleep disturbance and stress effects, having regard to WHO health-based noise guidance, the existing rural baseline, vulnerable groups, local access dependence and repeated or prolonged disruption.
- A revised Traffic and Transport Assessment and Road Safety Audit that expressly links road safety, access disruption, lighting, glare, emergency access and local amenity to population and human health.
- A revised set of precise, enforceable conditions dealing separately with construction noise, operational noise, temporary lighting, permanent lighting, glare, working hours, complaints, monitoring, corrective action and public reporting.
- A cumulative assessment with any other road, grid, windfarm, motorway or utility works that could increase noise, lighting, traffic disruption, stress or sleep disturbance for the same residents.

14.11 Requested Decision

It is requested that An Coimisiun Pleanala refuse permission, or alternatively require further information and public consultation, unless and until the applicant demonstrates that the grid

connection has been assessed as a major route-based source of human-health, safety, noise, light and residential amenity impacts.

Permission should not be granted on the basis of Galway County Council's report as currently drafted. The report relies too heavily on broad population growth and energy-security policy and does not adequately assess the actual people along the grid route as receptors. It does not properly integrate construction noise, sleep disturbance, light pollution, glare, stress, road safety, access dependence, vulnerable receptors or cumulative works into its human-health assessment.

Any conditions relied upon must be clear, precise, enforceable and based on a complete pre-consent assessment. Conditions should not be used to defer essential information about receptor locations, night-time risk, lighting spill, glare, construction noise, sleep disturbance, traffic disruption or stress until after permission is granted.

14.12 Conclusion

This is a proper planning, residential amenity and EIAR objection point. The grid connection should not be treated as a neutral engineering component. It is a long linear construction project through local road corridors, affecting people, access, road safety, quiet enjoyment, night-time darkness, sleep and stress. Galway County Council's report does not demonstrate that these effects have been assessed in a sufficiently route-specific and health-based manner.

The Galway County Development Plan 2022-2028 requires careful control of noise and light pollution and requires electricity and gas infrastructure to be assessed subject to residential amenity, environmental quality, public health and proper planning considerations. WHO guidance reinforces that environmental noise and night-time disturbance are public-health issues, not merely matters of convenience. On the information presently available, An Coimisiun Pleanála should require a full receptor-based reassessment before any decision is

made.

14.13 References

- Galway County Council Planning Authority Report under section 37E(4) for ACP-324113-26, including its discussion of planning policy, population growth, EIAR topics, roads and transportation, noise and vibration, and recommended conditions.
- Cashla Peaker Plant EIAR, Volume 2 - Main EIAR, including Chapter 4 Population and Human Health, Chapter 9 Noise and Vibration, Chapter 10 Traffic and Transportation, Chapter 14 Material Assets and Chapter 16 Cumulative Impacts.
- Galway County Development Plan 2022-2028, Chapter 7 Infrastructure, Utilities and Environmental Protection, including EG 1, EG 2, EG 4, NP 1 to NP 5 and LP 1 to LP 3.
- World Health Organization, Environmental Noise Guidelines for the European Region, 2018.
- World Health Organization, Night Noise Guidelines for Europe, 2009.
- Relevant public-health literature on artificial light at night, circadian rhythm and sleep disturbance.
- Observer's previous materials concerning road network impacts, grid connection route, cumulative road-space conflict, thermal resistivity, maintenance and emergency access.

Chapter 15: DAU Nature Conservation Letter, Legal Consequences and Requirement for Route-Specific Reassessment

15.1 Overview of Chapter

This chapter should be read together with Chapter 6 of this document, which addresses the defective ecological and Appropriate Assessment scoping of the underground cable route, and Chapter 7, which addresses the inadequate assessment of nesting birds, hedgerows, tree removal and landowner permissions along that route.

Chapter 6 explains that the underground grid connection (approximately 8.1 km long) follows the L3103, L7108, L71093, and L7109 local roads, requires HDD works beneath the M6 and M17 motorways, and is essential enabling infrastructure without which the peaker plant cannot export electricity to Cashla Substation. It is therefore not a minor ancillary item or a neutral road-opening exercise. It is a substantial linear construction project through a rural landscape containing hedgerows, trees, roadside verges, stone walls, drainage features, potential karst groundwater pathways and areas requiring contractor access, compounds and construction management.

Chapter 7 explains that the same cable route has not been sufficiently assessed in relation to nesting birds, hedgerows, tree groups, roadside trees, scrub, bat commuting habitat, tree-root impacts, private boundary vegetation, and landowner permissions. It identifies the inadequacy of relying on a general commitment that vegetation clearance will take place outside the bird breeding season, where the documentation does not contain a route-specific chainage-by-chainage assessment of all affected vegetation, ownership, access rights and ecological constraints.

The Department of Housing, Local Government and Heritage / Development Applications Unit (DAU) Nature Conservation response dated 24 April 2026 materially strengthens these

objections. The DAU reviewed the NIS and associated ecological and technical documentation for the Cashla Peaker Plant and associated infrastructure. It identified significant uncertainty in relation to hydrological connectivity, artificial lighting and disturbance, the ornithological baseline, bat impacts, mitigation specificity and in-combination effects. It concluded that further information is required before it is possible to conclude, beyond reasonable scientific doubt, that the proposed development will not adversely affect the integrity of European sites.

15.2 The DAU submission is Material Expert Evidence, Not a Minor Consultation Comment

The DAU letter is an expert nature-conservation response from the Department with statutory responsibility for nature conservation and NPWS-related functions. It is therefore a highly material response for An Coimisiún Pleanála when carrying out Appropriate Assessment under Article 6(3) of the Habitats Directive and under Part XAB of the Planning and Development Act 2000, as amended.

The DAU expressly states that consent for the proposed development may only be granted where it can be established, beyond reasonable scientific doubt, that the proposed development will not adversely affect the integrity of any European site, either alone or in combination with other plans or projects. It then states that, on the basis of the information provided, that conclusion cannot presently be reached.

That is directly relevant to Chapters 6 and 7. The concerns in those chapters are not merely localised complaints about individual hedges, trees or construction methods. They go to the adequacy of the project-wide ecological baseline, the adequacy of the Appropriate Assessment, the ability to identify all impact pathways, and the legal ability of the Commission to reach the required scientific certainty before granting consent.

15.3 Applicable Legal Test: No Lacunae, No Unresolved Scientific Doubt

Article 6(3) of the Habitats Directive requires an appropriate assessment of any plan or project likely

to have a significant effect on a European site, either individually or in combination with other plans or projects. Consent may only be given after the competent authority has ascertained that the project will not adversely affect the integrity of the site concerned.

The Court of Justice established in Waddenzee, Case C-127/02, that an Appropriate Assessment is required where significant effects cannot be excluded on the basis of objective information, and that all aspects of the plan or project which may affect the site's conservation objectives must be identified in light of the best scientific knowledge in the field. Consent may only be granted where no reasonable scientific doubt remains as to the absence of adverse effects.

In Sweetman v An Bord Pleanála, Case C-258/11, the Court of Justice confirmed the strictness of that test in an Irish Galway context concerning the Lough Corrib site. It stated that the competent authority must be certain that the project will not have lasting adverse effects on the integrity of the site and that an Appropriate Assessment cannot have lacunae; it must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt.

The Irish courts have applied the same principle domestically. In Kelly v An Bord Pleanála [2014] IEHC 400, the High Court held that where no lawful determination had been made that the development would not adversely affect the integrity of any European site, the Board had no jurisdiction to grant permission. In Connelly v An Bord Pleanála [2018] IESC 31, the Supreme Court emphasised that Appropriate Assessment requires the complete, precise and definitive scientific findings required by EU law, and not merely a recital that the competent authority has reached the correct conclusion.

The legal consequence is clear. If the DAU says that significant uncertainty remains and further information is required, the Commission cannot lawfully treat that issue as answered by general mitigation, future contractor surveys, a future CEMP, or standard best-practice measures unless

it has before it complete, precise and definitive scientific findings that dispel the uncertainty.

15.4 Holohan: The Commission Must Either Obtain the Information or Give Explicit and Detailed Scientific Reasons

Holohan v An Bord Pleanála, Case C-461/17, is particularly important because it concerned an Irish reference and because NPWS was an intervener. The Court of Justice held that Appropriate Assessment must catalogue the entirety of habitat types and species for which a site is protected and must also identify and examine implications for habitats and species outside the boundaries of a European site where those implications may affect the site's conservation objectives.

Holohan also held that where a competent authority rejects the findings in a scientific expert opinion recommending that additional information be obtained, the Appropriate Assessment must include an explicit and detailed statement of reasons capable of dispelling all reasonable scientific doubt concerning the effects of the work envisaged on the site concerned.

The DAU letter is precisely the type of expert opinion addressed by Holohan. It recommends that further information be obtained and assessed. If the Commission disagrees with the DAU, it must do much more than simply state that it has considered the NIS, EIAR, Outline CEMP and submissions. It must provide an explicit, detailed and scientifically reasoned basis for rejecting the DAU concerns. In the absence of that, the legally safer and environmentally necessary course is to require the further information and reassessment now, before any grant of permission or approval.

15.5 The Peaker Plant and Grid Connection Must Be Assessed as One Integrated Project

The connected applications PA07.324113 and VA07.324162 should not be used, intentionally or unintentionally, to lower the standard of environmental assessment for the grid route. The peaker plant cannot perform its intended function without the 220 kV connection to Cashla Substation. The grid route is therefore functionally integral to the overall project.

In *Ó Gríanna v An Bord Pleanála* [2014] IEHC 632, the High Court held that the grid connection for a wind farm was an integral part of the overall development and that the Board had failed to carry out the required EIA where there was no cumulative assessment of the generating development and the

necessary grid connection. The same principle applies here. A peaker plant and the grid infrastructure required to export its electricity must be assessed as one overall project for EIA and AA purposes. People Over Wind and Sweetman v Coillte, Case C-323/17, is also relevant because it arose from underground cable works associated with a grid connection. The Court of Justice held that mitigation measures intended to avoid or reduce harmful effects cannot be relied upon at the screening stage to avoid Appropriate Assessment. The case demonstrates that underground cable works are not automatically environmentally neutral and that their potential ecological pathways must be assessed properly.

Accordingly, the Commission should require a single integrated reassessment of the peaker plant, the 220 kV underground cable route, HDD works, joint bays, drainage pathways, construction traffic, vegetation works, lighting, ecological mitigation and cumulative effects, including the connected VA07.324162 application.

15.6 Hydrological Connectivity, Karst, HDD and the Water Framework Directive

The DAU identifies hydrological connectivity as a principal impact pathway. It states that the NIS does not provide sufficient site-specific evidence to robustly demonstrate the absence of hydrological connectivity between the proposed development and European sites. It also states that the assessment relies significantly on generalised assumptions regarding distance and catchment characteristics, without detailed mapping of drainage pathways or a clear demonstration of how pollutants or sediment could be prevented from reaching downstream receptors.

This directly supports Chapter 6. The cable route involves trenching, joint bays, HDD launch and reception areas, dewatering risk, bentonite use, sediment control, accidental pollution risk, interaction with road drainage, and works in a karst-influenced limestone landscape. The relevant question is not merely whether the road surface is within a public road. The relevant question is whether surface-water, groundwater, drainage, karst, culvert, ditch, spring, well or construction-pathway effects can reach European sites or water-dependent ecological receptors.

The Water Framework Directive reinforces the need for a proper hydrological and hydrogeological pathway assessment. In Bund für Umwelt und Naturschutz Deutschland v Germany, Case C-461/13

(Weser), the Court of Justice held that Member States must not authorise a project that may cause deterioration of the status of a body of surface water. Where the DAU itself says that hydrological pathways and accidental pollution events have not been fully characterised, the Commission cannot safely conclude that the project complies with either Article 6(3) of the Habitats Directive or the Water Framework Directive objectives.

Further information should therefore include a route-specific hydrological and hydrogeological assessment for the full 8.1 km cable corridor, including all trench sections, HDD sections, joint bays, road drains, culverts, groundwater vulnerability, karst features, springs, wells, dewatering locations, bentonite breakout risk, sediment-control locations, spill-response procedures and downstream European-site receptors.

15.7 Ornithology, Functionally Linked SPA Habitat and Nesting Birds

The DAU states that the Breeding and Wintering Bird Survey comprises only four wintering surveys and three breeding season surveys, undertaken over relatively short time periods and largely confined to the development footprint and immediate surroundings. It states that the survey scope does not provide a comprehensive assessment of bird usage of the wider area, including lands that may be functionally linked to nearby Special Protection Areas. It also notes that species of conservation concern, including Golden Plover, utilise the wider area.

That supports the objection in Chapters 6 and 7 that the bird survey cannot be treated as a route-wide assessment of the 8.1 km cable corridor. The cable route is the part of the project that disturbs the longest length of roadside habitat. It passes hedgerows, roadside trees, scrub, verges, stone walls, woodland-edge features, junction works, possible sightline clearance, HDD compounds and temporary working areas. These features may be used by breeding birds, nesting birds, wintering birds and birds moving through functionally linked habitat.

The DAU also states that disturbance has not been sufficiently developed, particularly in relation to integrated effects from lighting, noise, human activity and operational processes, and that the applied Zone of Influence is restricted. This is consistent with the objection that the cable route must be assessed beyond the narrow tarmac surface and immediate plant footprint.

The Birds Directive requires Member States to protect wild birds against deliberate killing, deliberate destruction or damage to nests and eggs, removal of nests, and significant disturbance during breeding and rearing. In Irish law, Section 40 of the Wildlife Act 1976, as amended, restricts cutting, grubbing, burning or otherwise destroying relevant vegetation during the period from 1 March to 31 August, subject to limited statutory exceptions. A general promise that vegetation clearance will be outside the breeding season is not an adequate substitute for route-specific survey, mapping, timing, stop-work procedures and enforceable ECoW controls.

15.8 Bats, Hedgerows, Treelines and Lighting

The DAU identifies significant deficiencies in the bat assessment. It states that the bat survey consisted of a preliminary walkover and thirteen consecutive nights of static detector monitoring in June, which provides summer activity information but does not constitute a comprehensive multi-season assessment. It states that the absence of spring and autumn survey effort introduces uncertainty regarding commuting, dispersal and swarming behaviour.

The DAU further states that treeline habitat supports higher levels of bat activity and that potential roosting within tree features has not been confirmed or excluded by a detailed roost assessment. It also states that the assessment is primarily confined to the development footprint and does not adequately consider the role of boundary habitats and linear features as commuting routes within the wider landscape.

This directly supports Chapters 6 and 7. The relevant ecological features along the cable route are not limited to the public-road carriageway. They include adjacent hedgerows, treelines, root protection areas, private boundary vegetation, woodland W1, hedge H1, tree groups, roadside stone walls, verges, construction compounds, HDD working areas, road-closure areas and temporary lighting zones.

The DAU's lighting criticism is particularly important. It notes that the proposed development includes permanent lighting infrastructure with luminaires at approximately 8 metres and 20 metres and lighting designed to achieve average horizontal illuminance in the order of 10 lux,

with higher localised values. It states that artificial lighting is not assessed within the bat report and that, in the absence of such assessment, the potential for disruption of commuting routes and displacement from foraging habitat cannot be excluded.

Bats are Annex IV strictly protected species under the Habitats Directive. In Ireland, Article 12 protection is transposed through the European Communities (Birds and Natural Habitats) Regulations 2011, including Regulation 51 for strictly protected fauna. The Commission should therefore require a route-wide multi-season bat assessment, roost-potential survey, tree-feature assessment, commuting-corridor assessment and bat-sensitive lighting assessment before consent is granted.

15.9 Mitigation and CEMP Deferral Cannot Cure Baseline Gaps

The DAU states that the mitigation measures in the NIS are described in general terms, lack sufficient detail regarding implementation and effectiveness, and rely on standard best-practice measures without clear demonstration of adequacy in the specific context of this site. It correctly states that mitigation measures must be precise, certain and capable of implementation in order to be relied upon in Appropriate Assessment.

This is central to Chapter 6. The Outline CEMP and construction methodology place substantial responsibility on a future contractor, a future Environmental Manager and a future Ecological Clerk of Works. Those roles and route-section controls are not sufficiently fixed at consent stage. Pre-construction walkovers are useful where they check for changed circumstances; they are not an acceptable substitute for baseline ecological, hydrological, ornithological and bat surveys that should have been carried out before consent.

Holohan permits certain construction parameters to be left to later developer determination only where the consent conditions are strict enough to guarantee that those parameters will not adversely affect site integrity. The current combination of unresolved DAU concerns, general mitigation, contractor-led future plans, indicative tree locations, limited route-specific bird and

bat information, and missing drainage-pathway mapping does not meet that standard.

15.10 Landowner Permissions, Vegetation Mapping and Implementability of Mitigation

The DAU letter does not itself determine landowner permission or wayleave issues. However, its ecological conclusions make those issues more important. If hedgerows, treelines, boundary vegetation, tree-root zones, private property edges, storage areas, passing bays, compounds and access areas are ecologically relevant, the applicant must identify exactly what features are affected and demonstrate that the proposed mitigation can lawfully and practically be implemented.

Chapter 7 identifies that the Tree Survey Report states that some trees along the public-road cable route were not plotted by topographic survey methods and that their positions should be regarded as indicative. It also states that trees on private property were not accessed directly and that inaccessible trees were assessed from visible parts only. This is a significant limitation where root severance, hedge cutting, vegetation removal, sightline works, access, temporary occupation or construction management may affect private boundary features or third-party lands.

Planning permission, if granted, does not of itself authorise entry onto third-party land or removal of another person's trees, hedges, roots or boundary vegetation. The Commission should therefore require a mapped vegetation and land-interest schedule for the full cable route, identifying ownership status, wayleave/easement/licence position, consent status, chainage, affected vegetation, ecological value, timing of works and mitigation requirements. Without such information, the Commission cannot be satisfied that the ecological mitigation proposed is precise, certain and capable of implementation.

15.11 Required Further Information and Reassessment

Before any grant of permission or approval for PA07.324113 or the connected VA07.324162

application, the applicant should be required to provide a revised, integrated NIS/EIAR addendum covering the entire peaker plant and grid connection project. This further information should be publicly available and should be referred back to the DAU/NPWS and Galway County Council for comment.

At minimum, the further information should include:

- A route-wide ecological survey of the full 8.1 km cable corridor, including hedgerows, verges, roadside trees, scrub, woodland edges, stone walls, ditches, drains, culverts, joint bays, HDD launch and reception areas, temporary works areas, passing bays, storage areas and construction compounds.
- A route-wide breeding, wintering and nesting bird reassessment, including functionally linked SPA habitat, wider disturbance effects, Golden Plover and other species of conservation concern, and the risk of displacement arising from lighting, noise, traffic, human activity and construction sequencing.
- A route-wide multi-season bat assessment, including spring, summer and autumn survey effort, tree-roost potential, emergence/re-entry surveys where required, commuting corridors, foraging features, hedgerow and treeline connectivity, severance effects and bat-sensitive lighting design.
- A hydrological and hydrogeological pathway assessment for trenching, HDD, dewatering, sediment, concrete/cement washout, hydrocarbons, bentonite breakout, accidental pollution, karst features, groundwater vulnerability, surface-water runoff, drains, culverts, springs, wells and downstream European sites.
- A mapped vegetation and tree-impact schedule identifying every hedge, tree, scrub area, root zone, verge, woodland edge and boundary feature to be removed, cut, coppiced, felled, root-pruned, disturbed or protected, with chainage, ownership status and ecological value.

- Written evidence of landowner permission, wayleave, easement, licence or other lawful authority for any works affecting third-party lands, private boundary vegetation, roots, temporary works areas, storage areas, passing bays, access points or occupation areas.
- A revised CEMP that contains precise and enforceable mitigation, including a named independent ECoW, stop-work authority, route-section sign-off, inspection frequencies, lighting controls, HDD and bentonite protocols, pollution response, written compliance logs and reporting obligations to Galway County Council, DAU/NPWS and An Coimisiún Pleanála.
- A revised in-combination assessment covering PA07.324113, VA07.324162, other grid works, road works, nearby energy infrastructure, wind farm grid connections, overlapping construction programmes, cumulative hydrological risk, cumulative lighting, cumulative disturbance and cumulative loss or severance of linear habitats.

15.12 Requested Finding

The Commission is requested to find that the present NIS, EIAR and Outline CEMP do not yet provide the complete, precise and definitive scientific findings required for a lawful Appropriate Assessment of the integrated peaker plant and grid connection project.

The Commission is further requested to require the further information identified above, to subject that information to public participation and statutory consultation, and to complete a revised Appropriate Assessment before any decision is made. If that information is not provided, the Commission should refuse permission or approval because it cannot be satisfied beyond reasonable scientific doubt that the project will not adversely affect the integrity of European sites, protected species, functionally linked habitats, water-dependent receptors, bats, birds, hedgerows and linear ecological corridors.

15.13 Without-Prejudice Conditions if Permission is Considered

If, contrary to this objection, the Commission is minded to grant permission or approval, any

permission should at minimum include conditions requiring the following before commencement:

- No commencement until a revised integrated NIS/EIAR addendum has been submitted and approved, addressing all DAU Nature Conservation concerns.
- No trenching, HDD, dewatering, joint-bay excavation, vegetation clearance, night works or lighting along the cable route until the independent ECoW has signed off the relevant route section.
- No vegetation clearance between 1 March and 31 August unless lawfully exempt and supported by a recorded ECoW survey confirming no active nests or protected species will be disturbed.
- No artificial lighting or night works along the cable route unless a bat-sensitive lighting plan has been prepared and approved for the exact section and works proposed.
- No works affecting third-party lands, private boundary vegetation, roots, storage areas, passing bays or access areas unless the applicant has demonstrated lawful authority and the affected ecological features have been mapped and assessed.
- Mandatory stop-work powers for the ECoW and mandatory reporting of ecological, hydrological, HDD, pollution, nesting bird, bat, lighting or unauthorised vegetation impacts to the relevant authorities.

15.14 Conclusion

The DAU Nature Conservation letter materially confirms and strengthens the concerns raised in Chapters 6 and 7. It identifies the same core weaknesses: insufficient hydrological pathway analysis, limited ornithological baseline, inadequate consideration of disturbance and lighting, insufficient bat assessment, lack of detailed assessment of linear features, over-reliance on general mitigation and unresolved in-combination effects.

The legal authorities make the consequence clear. Under Waddenzee, Sweetman, Holohan,

Kelly and Connelly, the Commission may not grant consent unless all relevant effects of the integrated project have been assessed using the best scientific knowledge and unless no reasonable scientific doubt remains. Under Ó Gríanna, the grid connection cannot be treated as a secondary or separate afterthought. Under People Over Wind, cable works and mitigation must be scrutinised properly. Under Weser and the Water Framework Directive, hydrological uncertainty must be resolved before authorisation. Under the Birds Directive, Habitats Directive, Wildlife Acts and Birds and Natural Habitats Regulations, nesting birds, bats, hedgerows, treelines and protected species require precise and enforceable protection.

In those circumstances, it would be premature and legally unsafe to grant permission or approval on the basis of the present documentation. The appropriate course is to require a revised, route-specific and integrated ecological, hydrological, hydrogeological, ornithological, bat, lighting, vegetation, land-consent and in-combination reassessment for both PA07.324113 and VA07.324162 before any decision is made.

15.15 References

- Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora, Article 6(3) and Article 12.
- Directive 2009/147/EC on the conservation of wild birds, Article 5.
- Directive 2000/60/EC establishing a framework for Community action in the field of water policy, Article 4.
- Wildlife Act 1976, as amended, including Section 40.
- European Communities (Birds and Natural Habitats) Regulations 2011, as amended, including Regulation 51.
- Landelijke Vereniging tot Behoud van de Waddenzee, Case C-127/02.
- Sweetman v An Bord Pleanála, Case C-258/11.
- Holohan v An Bord Pleanála, Case C-461/17.

- People Over Wind and Sweetman v Coillte, Case C-323/17.
- Grace and Sweetman v An Bord Pleanála, Case C-164/17.
- Bund für Umwelt und Naturschutz Deutschland v Germany, Case C-461/13 (Weser).
- Kelly v An Bord Pleanála [2014] IEHC 400.
- Connelly v An Bord Pleanála [2018] IESC 31.
- Ó Gríanna v An Bord Pleanála [2014] IEHC 632.
- Madden v An Bord Pleanála [2022] IEHC 257.
- Dark Sky Roscommon v An Bord Pleanála [2024] IEHC 318.
- Balz and Heubach v An Bord Pleanála [2019] IESC 90.

Chapter 16: Failure of Galway County Council Planning Authority Report to Address Development Plan and Material Assessment Gaps

16.1 Introduction

This chapter is submitted in regard to Galway County Council's section 37E report and its treatment of the Galway County Development Plan 2022-2028, together with material assessment gaps affecting the grid connection, substation, road network, motorway crossings, ecology, hydrology, public participation, residential amenity and the proper planning and sustainable development of the area.

The central submission is that Galway County Council relied on selected supportive policy wording for energy, gas, grid infrastructure and the Oranmore-Athenry Strategic Economic Corridor, while failing to give equivalent weight to the qualifying and protective provisions of the same Development Plan. The Development Plan must be read as a whole. It does not create a blanket presumption in favour of the proposed development merely because the project relates to energy infrastructure or is located near a strategic economic corridor.

The Development Plan policy material is central to this chapter because the Development Plan is required to be applied under planning law. Galway County Council was required to assess whether the chosen site, the approximately 8.1 km underground grid connection, the road works, the motorway HDD crossings, the substation infrastructure and the associated telecommunications must comply with the full policy framework, including the policies that protect landscape, residential amenity, ecological connectivity, water resources, road safety, soil quality, noise, lighting, hedgerows, trees, stone walls, turloughs, karst and groundwater.

The support for infrastructure in the Galway County Development Plan 2022-2028 is conditional. It must be reconciled with proper planning and sustainable development, protection of residential amenity, road safety, public health, ecological connectivity, water

resources, landscape, cultural and natural heritage, groundwater, karst, turloughs, soil quality, field boundaries, stone walls, trees, hedgerows and cumulative impacts. Galway County Council's report did not carry out that balanced exercise.

16.2 Galway County Council's Role under Section 37E(4)

Under section 37E(4) of the Planning and Development Act 2000, as amended, the Planning Authority is required to report to An Coimisiún Pleanála on the effects of the proposed development on the environment and on the proper planning and sustainable development of the area. In a Strategic Infrastructure Development process, this report is not a mere administrative comment. It is a statutory opportunity for the local planning authority to identify local receiving-environment issues, public road impacts, public health concerns, environmental risks, Development Plan conflicts, cumulative impacts and unresolved information gaps.

Galway County Council's report acknowledges the Planning Authority's function, but it does not adequately engage with several material issues apparent from the application documents, Transport Infrastructure Ireland's observations, the Freedom of Information pre-planning material and the Council's own Roads and Transportation comments. These omissions are particularly important because the grid connection is not an optional accessory. It is essential enabling infrastructure without which the peaker plant cannot export electricity to the national grid.

The Planning Authority therefore had to assess the plant, substation, 36 m telecommunications mast, gas connection and approximately 8.1 km underground grid connection as a coherent project. It also had to apply the Galway County Development Plan 2022-2028 to the real development, including the selected site, the cable corridor, the road network, the motorway crossings, the receiving environment and the long-term maintenance consequences.

16.3 Failure to Assess the Whole Project and the Effect of Split Consents

The application material treats the project as including the peaker plant, 220 kV substation compound, approximately 8.1 km underground grid connection and gas connection. At the same time, key elements are pursued through separate consent routes. This split-consent structure required more scrutiny, not less.

Galway County Council did not adequately test whether the procedural split affects public understanding, Environmental Impact Assessment completeness, Appropriate Assessment certainty, cumulative assessment, alternatives assessment, enforceability of mitigation or the public's ability to understand the whole development. A project may be procedurally divided for consenting purposes, but where its elements are functionally interdependent, the environmental effects must be understood and assessed as a coherent whole.

The Council should have expressly considered whether the public-facing documentation clearly explained what each application covers and how the cumulative and in-combination effects would be assessed. This is particularly important because the grid connection, substation, telecommunications mast and gas infrastructure are not peripheral matters. They are necessary to the functioning of the proposed peaker plant and they generate their own effects on roads, residents, ecology, hydrology, landscape and public infrastructure.

16.4 Failure to Compare the Final Project with the Pre-Planning Version

The FOI records show that Galway County Council held pre-planning material including the January 2025 consultant letter, February 2025 pre-planning meeting minutes, Bord Gáis presentation, stakeholder engagement strategy, photographs and maps, emails, and later correspondence from An Coimisiún Pleanála. Those records show that the project was evolving and that key issues were not fully settled at pre-planning stage.

The pre-planning material referred to a proposed 325-340 MW open-cycle gas turbine plant,

associated infrastructure and a grid connection to Cashla Substation. It also showed that feasible grid connection routes were being investigated and that the route was not fully finalised at that stage. The meeting minutes record that alternatives were being assessed and that the application might need to include options for the grid connection.

In those circumstances, Galway County Council should have compared the final application against the pre-planning version and asked whether the project materially changed in scale, route, impacts or public understanding. Particular attention should have been given to the 36 m telecommunications mast, the approximately 8.1 km underground grid route, the 220 kV substation compound, the three HDD motorway crossings, the final access and haul arrangements, the final red-line boundary, and the interface with the motorway reservations.

16.5 Unbalanced Reliance on Selected Energy-Support Policies

Galway County Council referred to the energy and gas policy objectives in Chapters 7 and 14 of the Development Plan as providing policy support for the principle of the proposed development. However, the wording of those policies is not unconditional.

Chapter 7 Policy Objective EG 1 supports the sustainable improvement and expansion of electricity infrastructure while taking into consideration landscape, residential, amenity and environmental considerations. Policy Objective EG 2 supports electricity and gas transmission networks subject to environmental quality, landscape, wildlife, habitats and residential amenity. Policy Objective EG 4 supports Ireland's Grid Development Strategy while again taking account of landscape, residential, amenity and environmental considerations.

These qualifications are central. The Council report appears to rely on the supportive part of the policy framework but does not properly apply the qualifying safeguards to the facts of the application. The 8.1 km cable route, road works, HDD motorway crossings, joint bays, road closures, route-side trees, hedgerows, stone walls, possible bat corridors, groundwater vulnerability and karst setting are precisely the types of considerations that EG 1, EG 2 and EG

4 require to be assessed.

A balanced Development Plan assessment would have asked whether the selected site and route satisfy those environmental and amenity safeguards. Instead, the report appears to treat energy security and grid connection as overriding considerations, without properly testing whether the project complies with the Development Plan when the plan is read as a whole.

16.6 Failure to Apply Chapter 14 EG 2(d): Alternatives, Grid Routing and Road-Network Impact

Chapter 14 Policy Objective EG 2 is central to this objection. It requires proposed renewable energy generation projects to fully consider the capacity of the existing transmission grid network in determining the optimal grid connection for the project, in accordance with proper planning and sustainable development. It further states that grid connection routing should show all alternative routes that were considered and should avoid materially impacting the road network, where possible. Undergrounding is to be considered where it will significantly negate identified impacts.

This policy should have been one of the main tests applied by Galway County Council. It was not enough to say that the site is near existing electricity or gas infrastructure. The relevant question was whether the selected plant site and final grid route represent the optimal grid connection when the total project impact is considered.

The final application requires approximately 8.1 km of underground grid connection, predominantly along local roads, and three HDD motorway crossings. That route brings direct road-network impacts, construction disruption, joint bay constraints, traffic management, road-opening licences, future maintenance implications and potential cumulative effects with other grid connection projects.

A site west of the motorway or closer to Cashla Substation may have reduced the grid route length, reduced the number of road sections affected, reduced or avoided HDD motorway

crossings, reduced joint bay impacts, reduced ecological disturbance along rural roads and reduced long-term cable maintenance risk. Galway County Council did not adequately critique whether such alternatives had been properly assessed. It therefore failed to give meaningful effect to Chapter 14 EG 2(d).

16.7 Strategic Economic Corridor Policy Was Treated Too Broadly

The Planning Authority appears to rely on the site's broader economic and infrastructure context, including the Oranmore-Athenry Strategic Economic Corridor, as part of the justification for the proposal. However, the Strategic Economic Corridor policy is not a blanket permission for any form of strategic infrastructure.

The Development Plan describes the corridor as an area intended to attract investment, stimulate economic development and employment creation, and support specialist enterprise and technology-based uses. It also requires that development be compatible with the enhancement, preservation and protection of the environment and cultural resources within the corridor.

A peaker plant with limited long-term employment, a lower-tier COMAH profile, a large above-ground industrial compound, a 36 m telecommunications mast associated with the substation application, a long underground grid connection, HDD motorway crossings and significant local road works is not ordinary employment development. Galway County Council should have assessed whether the project genuinely advances the intended planning purpose of the Strategic Economic Corridor, or whether it imposes an infrastructure burden on rural communities and local roads without delivering the type of sustainable employment, placemaking, compact growth and high-standard economic development envisaged by the Development Plan.

The Development Plan requires compatibility with environmental and cultural protection and the identification of appropriate sites for necessary infrastructure or support activities which

would not be appropriate near population centres or sensitive environments. The Planning Authority did not give sufficient attention to whether this particular site, this particular route and this particular road/motorway interface represent an appropriate location when those safeguards are applied.

16.8 Failure to Apply Transport, Road Safety and Development Management Policies

The Development Plan contains strong policies on transport, road safety and the carrying capacity of the road network. Chapter 6 Policy Objective NR 3 requires significant development proposals that have the potential to impact the national road network to be accompanied by a Traffic and Transport Assessment and Road Safety Audit carried out in accordance with TII guidance. Chapter 15 DM Standard 33 requires significant development proposals, or those posing a safety risk or traffic impact, to be accompanied by road safety audits, road safety impact assessments and transport and traffic assessments, including consideration of cumulative impact on the road network.

Galway County Council Roads and Transportation identified that sightlines and stopping sight distances for the substation development entrance had not been demonstrated, that a Stage 1/2 Road Safety Audit was absent, and that a detailed Traffic and Transport Assessment had not been submitted in accordance with TII guidance. These are not minor engineering matters. They are directly relevant to Development Plan compliance.

Transport Infrastructure Ireland also identified national road and motorway-interface issues, including abnormal and exceptional abnormal loads, structural assessment of road structures, management of the strategic road network, HDD motorway crossings, Section 53 Roads Act consent, protection of motorway drainage and infrastructure, lighting glare/distraction, and reinstatement of national road assets to TII standards.

The Planning Authority should have incorporated these matters more forcefully into its

planning assessment. It should not have treated road safety, public infrastructure, emergency access, construction feasibility, motorway reservations and reinstatement as matters capable of being resolved entirely by post-consent condition where they affect the acceptability of the route and the adequacy of the alternatives assessment.

16.9 Failure to Address Cumulative Road-Space Conflict with Other Grid Projects

TII identified that the Cashla Peaker Plant grid connection and the Gannow Windfarm grid connection both appear to use some of the same local road sections and that clarification may be required to show that both can be accommodated in finite road space. TII also noted that Gannow proposes one motorway crossing, whereas the Cashla Peaker Plant grid connection proposes three HDD motorway crossings.

Galway County Council should have assessed whether the two grid projects can physically fit within the same road corridors, whether joint bay locations conflict, whether closures could overlap or extend disruption, whether combined works could worsen emergency access, whether coordination would reduce impacts or merely prolong them, and whether cumulative road damage and reinstatement issues would arise.

This cumulative road-space issue is directly relevant to the grid connection objection because the same local community may experience repeated or prolonged road works from multiple strategic energy projects seeking access to Cashla Substation.

16.10 Failure to Apply Underground Cabling Policy to the Actual Route

Chapter 7 Policy Objective ICT 8 supports underground cabling where possible in the interests of visual amenity, but it also requires proposals to demonstrate that environmental impacts are minimised. The policy expressly identifies habitat loss from removal of field boundaries and hedgerows, short- to medium-term landscape impacts where hedgerows are encountered, impacts on underground archaeology, impacts on soil structure and drainage, and impacts on

surface waters from sedimentation.

The Planning Authority did not properly apply ICT 8 to the actual 8.1 km underground grid connection route. The route is not impact-free merely because it is underground. It involves trenching, joint bays, road openings, HDD launch and reception areas, possible vegetation and root impacts, soil disturbance, drainage impacts, sedimentation risk, service interactions and future access for maintenance.

This is a key Development Plan imbalance. Galway County Council appears to treat undergrounding as a benefit, but ICT 8 itself recognises that undergrounding can create significant impacts. Those impacts should have been assessed in detail and weighed against alternative routes and alternative site locations.

16.11 Failure to Address Route-Wide Ecology, Ecological Connectivity and Bat Policies

Chapter 10 of the Development Plan is directly relevant to the proposed grid connection. Policy Objective NHB 4 requires protection and conservation of areas, species and ecological networks of biodiversity value outside designated sites and allows for ecological appraisal where projects may affect European sites individually or cumulatively. NHB 5 supports protection and enhancement of biodiversity and ecological connectivity in non-designated sites, including woodlands, trees, hedgerows, semi-natural grasslands, rivers, streams, natural springs, wetlands, stone walls, geological and geomorphological systems, other landscape features and associated wildlife areas. NHB 9 seeks to protect bats, their roosts, feeding areas, flight paths and commuting routes, including linear features such as hedgerows, stone walls, watercourses and riparian vegetation. It also requires lighting impacts on bats to be adequately assessed.

The full approximately 8.1 km cable route appears not to have been ecologically assessed to the same level as the main peaker plant site. The route passes trees, hedges, groups of trees,

woodland-edge features, verges, stone walls, local roads, HDD work areas and karst-influenced groundwater pathways. It is therefore not an ecologically empty road corridor.

An assessment limited mainly to the main plant site and access road cannot answer the Development Plan policy question for an 8.1 km cable route. Nor can an arboricultural tree survey substitute for route-wide ecological, bat, bird, botanical, invasive species, mammal, amphibian and hydrogeological assessment. A tree survey may identify trees and root-protection issues, but it is not a breeding bird survey, bat survey, botanical survey, mammal survey, invasive species survey, hydrological survey or Appropriate Assessment survey.

A balanced Development Plan assessment should have highlighted that the full grid route appears to require route-specific ecological appraisal under NHB 4 and NHB 5, and a route-wide bat and lighting assessment under NHB 9.

16.12 Failure to Address Water, Wetland, Turlough, Groundwater and Karst Policies

The Development Plan requires protection of water resources, including rivers, streams, lakes, wetlands, springs, turloughs, surface water and groundwater quality, aquatic and wetland habitats and water-dependent species. This is highly relevant because the project is located in a limestone and karst-influenced setting, and Galway County Council's own report acknowledges potential hydrogeological pathways to European sites including Galway Bay Complex SAC, Inner Galway Bay SPA and Cregganna Marsh SPA.

The Planning Authority should have treated the karst, turlough and groundwater setting as a central Development Plan issue. The pre-application and project materials refer to possible turloughs or ponds, limestone and karst features, groundwater vulnerability and the need for geotechnical and hydrogeological investigation.

The cable route involves trenching, joint bays, HDD launch and reception areas, possible dewatering, sediment management, service crossings and interaction with local road drainage.

These works create a direct planning link between the grid connection and Development Plan water-resource policy.

The Council report does not appear to have required a corrected and resolved baseline for possible turloughs, karst pathways, wells, springs, groundwater-dependent habitats or route-specific hydrological receptors. A statement that the competent authority should be satisfied on Appropriate Assessment and Water Framework Directive matters does not replace the Planning Authority's obligation to identify Development Plan conflicts and unresolved environmental concerns.

16.13 Failure to Address the Adequacy of the Receiving Environment Description

The Planning Authority report describes the site as largely flat agricultural pasture beside major road infrastructure. Earlier objection material has raised concerns that the pre-application and application descriptions understate the actual receiving environment, including landform, woodland relationship, possible turloughs, karst setting, drainage and topographical complexity.

The Council should have required a corrected receiving-environment baseline addressing contour and spot-level evidence, cut-and-fill implications, local ponds and whether any are turloughs, karst hydrogeology, wells, drainage, groundwater pathways, and the actual location and relevance of woodland or conifer plantation features. This is not a cosmetic concern. A deficient site description can affect visual impact, construction methodology, hydrology, Appropriate Assessment, road design, drainage, foundation design and reasonable alternatives. A description that the site is dry or well drained is particularly inadequate in a karst limestone setting. Surface dryness may indicate rapid infiltration or subsurface drainage rather than environmental safety. The Council should have addressed this distinction expressly.

16.14 Failure to Address Soil Quality, Thermal Resistivity and Long-Term Cable Maintenance

Chapter 7 recognises that soils play a key role in food production, surface water, flood management, ecosystems and biodiversity, and that development proposals should ensure minimal impacts on soil quality and the wider environment. This policy context is relevant not only to construction disturbance but also to the performance and maintainability of the underground 220 kV cable.

For a 220 kV underground cable, soil thermal performance is directly linked to cable capacity, operating temperature, reliability, derating risk, maintenance risk and future road-opening requirements. The route passes through variable limestone till and a karst-influenced setting. In those conditions, route-wide thermal resistivity testing, seasonal dry-out analysis, backfill specification, ducting assessment and HDD thermal modelling are material to the proper assessment of the route.

If thermal performance is inadequate, the cable may require derating, remediation, repair or repeated access to joint bays and road sections. Such works could affect local residents, farms, businesses, school journeys, work journeys, emergency access, noise, vibration, road safety and public road-management resources. These are not purely engineering matters. They can generate future planning and environmental impacts.

Galway County Council should have addressed thermal resistivity and cable heating under material assets, roads, population and human health, land/soils/geology, reasonable alternatives and long-term maintenance impacts.

16.15 Failure to Balance Noise, Light Pollution, Residential Amenity and Public Road Safety

The Development Plan contains policies on noise and lighting which are relevant to construction, operation and road safety. Chapter 7 requires excessive noise to be regulated and controlled, and it recognises that light pollution is important from the perspectives of residential

amenity, nature conservation, traffic safety, visual amenity, dark skies and energy efficiency. Policy Objective LP 1 requires lighting schemes to minimise excessive light spillage so that impacts on residential amenity, wildlife and public roads are limited.

The grid connection route will involve construction activity along local roads, road closures, traffic management, machinery, possible night or out-of-hours abnormal load movements, HDD operations and joint bay works. TII separately identified the potential for on-site external lighting to cause glare, overspill or distraction to road users on the motorway network. Galway County Council Roads and Transportation also identified the need to assess public lighting and glare impacts.

These matters should have been tied directly to the Development Plan's noise, light pollution, residential amenity and road safety policies. Instead, the Council's planning assessment appears to accept the applicant's broad conclusion that operational traffic will be limited and construction impacts will be temporary. That approach is too narrow because the grid connection creates a long route of construction and potential future maintenance impacts that directly affect residents and road users.

16.16 Failure to Address the 36 m Telecommunications Mast as a Material Structure

The 36 m telecommunications mast associated with the 220 kV substation is one of the tallest structures in the overall project. Galway County Council appears to discuss the 30 m emissions stack and general visual impacts, but does not appear to separately critique the mast as a material structure in its own right.

Chapter 7 of the Development Plan requires co-location of antennae support structures where feasible, best practice in siting and design in the interests of visual amenity and sensitive landscapes, and a presumption against antennae support structures where they would have a serious negative impact on the visual amenity of sensitive sites and locations.

The mast should have been assessed for visual impact in combination with the emissions stack, pylons, motorway infrastructure and any nearby telecommunications proposals. Its lighting, aviation, telecommunications, landscape and cumulative visual implications should also have been separately considered. The Council should also have addressed whether the mast was properly and clearly identified in the relevant public notices and in the correct application.

16.17 Failure to Challenge Reliance on Future Contractor Surveys and Conditions

The application appears to rely heavily on future contractor surveys, contractor environmental management plans, pre-construction walkovers and later ecological controls. Galway County Council should have distinguished between ordinary construction management and the improper deferral of baseline information required before consent.

Where route-wide ecological, hydrological, karst, lighting, invasive species, HDD and cable-maintenance information is incomplete, a future contractor-appointed survey cannot practically or lawfully cure the baseline defect. The role of a contractor is to implement a consented project, not to provide the first meaningful environmental assessment of a major route corridor after permission has been granted.

Conditions are not adequate where the missing information affects Environmental Impact Assessment, Appropriate Assessment, public participation, road safety, reasonable alternatives, site selection or the basic feasibility of the grid connection route. Further information should have been required before any decision on the grid connection, including a corrected project description, a consolidated split-consent explanation, route-wide ecological assessment, complete road safety audit, traffic and transport assessment, long-term maintenance and road-opening assessment, thermal resistivity and cable thermal design assessment, HDD-specific risk assessment, cumulative road-space assessment with Gannow Windfarm, and a revised alternatives assessment considering a shorter west-of-motorway

option.

16.18 Failure to Address Residents' Lived Experience and Local Access Dependence

The Planning Authority acknowledges the rural one-off housing and farm-cluster context, but it does not translate that context into a proper population, human health and accessibility critique. The grid connection route, road closures, abnormal loads, construction traffic, joint bays, HDD works, future maintenance and potential overlap with other grid projects all affect a community that is dependent on narrow local roads.

The Council should have assessed impacts on emergency access, school journeys, work journeys, agricultural access, vulnerable residents, healthcare access, business access, community severance, noise, vibration, dust, lighting and repeated disruption over the lifetime of the project. These are not minor inconveniences. They are human-health and proper-planning issues arising from the selected route and site.

16.19 Summary of Development Plan Policies Not Given Adequate Weight

Development Plan area	Relevant policy issue	Assessment gap in Galway County Council report
Chapter 7 EG 1, EG 2 and EG 4	Energy infrastructure is supported only subject to landscape, residential, amenity, environmental, wildlife and habitat considerations.	The report relied on the supportive part of the policy but did not adequately apply the qualifying safeguards.
Chapter 14 EG 2(d)	Grid routes should show all alternatives considered and avoid materially impacting the road network where possible.	The report did not properly test whether a shorter or less road-intensive route/site was available.
Chapter 5 Strategic Economic Corridor	Economic corridor development must be compatible with environmental and cultural protection and appropriate site selection.	The report treated the corridor context too broadly and did not distinguish sustainable employment uses from high-impact utility infrastructure.
Chapter 6 NR 3 and Chapter 15 DM Standard 33	Significant developments require Traffic and Transport Assessment, Road Safety Audit, Road Safety Impact Assessment and cumulative road-impact assessment.	The report identified road issues but did not conclude that further information was required before decision.
Chapter 7 ICT 8	Underground cabling must minimise impacts on hedgerows, field boundaries, archaeology, soil, drainage and surface waters.	The report treated undergrounding as benign and did not assess the full route-specific impacts.
Chapter 10 NHB 4, NHB 5 and NHB 9	Ecological networks, hedgerows, stone walls, trees and bat routes require protection and assessment.	The report did not require route-wide ecological, bat, bird, botanical and lighting assessment for the full cable corridor.
Chapter 10 WR 1 and related water-resource policies	Water resources, springs, turloughs, wetlands, surface water and groundwater must be protected.	The report did not resolve karst, turlough and groundwater baseline uncertainty before supporting the principle of development.
Chapter 7 noise, light and soil policies	Noise, light pollution, soil quality and public road impacts require assessment and mitigation.	The report did not integrate these matters with the long-term grid connection and road-maintenance impacts.
Telecommunications and	Masts require proper siting,	The report did not assess the

visual amenity policies	design, co-location consideration and assessment of visual and cumulative effects.	36 m telecommunications mast as a separate material structure.

16.20 Planning Consequence of the Omissions

The omissions identified in this chapter are not isolated drafting defects. They combine to show that Galway County Council did not adequately scrutinise the grid connection as a major component of the overall project. The Council's report should have asked whether the selected site and route remain justified when the full consequences of the 8.1 km cable corridor, public road works, motorway crossings, karst setting, ecological receptors, road maintenance, cumulative projects and public participation issues are considered together.

The Planning Authority's role under section 37E(4) required it to provide a clear local planning assessment of these matters. In the objector's submission, the report falls short because it identifies or notes technical issues without drawing the necessary conclusion that the application is materially incomplete and that further information is required before any lawful decision can be made.

16.21 Requested Findings

It is requested that An Coimisiún Pleanála find that Galway County Council's Planning Authority report did not adequately address material assessment gaps relevant to the proposed grid connection, substation, telecommunications mast and associated infrastructure.

The observer further requests that the Commission find that the grid connection cannot be assessed as a minor ancillary element. It is essential enabling infrastructure and must be assessed as a major component of the overall project, including construction, operation, maintenance, cumulative effects and reasonable alternatives.

The Commission is requested to require further information and public consultation before any decision, including, at minimum: a consolidated project description; a corrected receiving-environment baseline; a route-wide ecological and Appropriate Assessment review; a complete

road safety and traffic assessment; a long-term cable maintenance and road-opening assessment; a thermal resistivity and cable heating assessment; an HDD and motorway-interface assessment; a cumulative assessment with Gannow Windfarm; and a revised alternatives assessment considering a shorter grid connection and a site west of the motorway.

16.22 Conclusion

Galway County Council Planning did not simply miss isolated details. It failed to address the planning significance of an evolved, procedurally split, road-heavy, karst-sensitive, ecology-sensitive and maintenance-dependent grid connection. The selected site creates a long and complex cable route through local roads and across motorway infrastructure. That complexity should have been central to the Planning Authority's assessment under section 37E(4).

Galway County Council also failed to apply the Galway County Development Plan 2022-2028 in a balanced way. The Council relied on selected energy, gas, grid and economic corridor policies to support the principle of the proposal, but did not give equivalent weight to the Development Plan policies that limit or qualify that support. When the Development Plan is read as a whole, it requires a far more cautious assessment of the selected site and grid connection route.

For these reasons, the Commission should not rely on the Planning Authority report as resolving the grid connection impacts. The report should instead be treated as identifying, but not adequately resolving, a series of material deficiencies that require further information, further public participation and a more rigorous assessment before any lawful decision can be made. In the absence of such demonstration, the grid connection application should be refused or, at minimum, further information and public consultation should be required before any decision is made.

16.23 References

- Galway County Development Plan 2022-2028, Chapter 5, Economic Development, Enterprise and Retail Development, including policies on the Strategic Economic Corridor and key employment locations.
- Galway County Development Plan 2022-2028, Chapter 6, Transport and Movement, including Policy Objective NR 3 on Traffic and Transport Assessment and Road Safety Audit.
- Galway County Development Plan 2022-2028, Chapter 7, Infrastructure, Utilities and Environmental Protection, including EG 1, EG 2, EG 4, ICT 4-8, WS 7, noise, light pollution and soil quality policies.
- Galway County Development Plan 2022-2028, Chapter 10, Natural Heritage, Biodiversity and Green/Blue Infrastructure, including NHB 2-5, NHB 9 and WR 1.
- Galway County Development Plan 2022-2028, Chapter 14, Climate Change, Energy and Renewable Resource, including EG 2 on optimal grid connection and alternative grid routes.
- Galway County Development Plan 2022-2028, Chapter 15, Development Management Standards, including DM Standard 33, DM Standard 47 and DM Standard 50.
- Galway County Council Planning Authority Report under section 37E(4) for ACP-324113-26, including policy assessment, roads and transportation comments and designated sites discussion.
- Transport Infrastructure Ireland submission, TII ref. TII26-135457, dated 23 April 2026, including comments on abnormal loads, strategic road-network management, HDD motorway crossings, road safety, lighting and reinstatement.

- FOI 13367 records released by Galway County Council, including pre-planning request, pre-planning meeting minutes, Bord Gáis presentation, engagement strategy, photographs/maps, emails and correspondence from An Coimisiún Pleanála.

Chapter 17: Major Accident, Fire and Emergency Response Deficiencies

17.1 Summary of Objection

This chapter objects to the adequacy of the assessment of major accident, fire, emergency access and emergency response issues associated with the proposed Cashla Peaker Plant and its associated 220 kV grid connection. The proposed development is not a standard rural industrial development. It is a lower-tier COMAH establishment involving the storage and handling of hazardous substances, fuel systems, gas infrastructure, transformers, electrical infrastructure, firewater and contaminated firewater systems, and an essential grid connection. The development is also proposed immediately beside the M6, M17 and M18 motorway network and is to be served by a single access route from the L3103.

The Health and Safety Authority has not certified that local emergency response capacity is adequate. The HSA letter states that it does not advise against the granting of permission in the context of major accident hazards, but it expressly directs attention to the need to consult local authority emergency services on access and egress arrangements, public behaviour in the event of an emergency, and fire prevention and response. The HSA also states that although the risk is considered sufficiently low, there remains a possibility of a major accident to the environment and that external emergency plans by local competent authorities should take account of these scenarios.

On the information presently available to the observer, there is no evidence that the Fire Officer at Athenry, the Fire Officer in Galway, or Galway County Council Fire and Rescue Service has been formally contacted in relation to the final planning application, the final EIAR, the final site layout, the single-access arrangement, the automated operation model, the hazardous substances, or the external emergency-response implications of this project. This is a material gap because the HSA has expressly directed the planning authority's attention to the need to

consult local authority emergency services. In the absence of such consultation, the adequacy of local fire and emergency services has not been assessed to date.

The applicant's EIAR describes a number of on-site fire detection, suppression, deluge, firewater and contaminated firewater retention measures. Those measures are relevant, but they do not answer the planning question. The critical issue is whether the proposed automated or remotely operated facility, located beside the motorway network and dependent on a single access route, can be safely reached, controlled, evacuated, isolated and responded to by local emergency services in a credible major accident, fire, explosion, gas incident, transformer fire, diesel-tank incident, propane incident, contaminated firewater event or cascading emergency. It is submitted that this has not been adequately demonstrated. The Commission should not treat the HSA's "does not advise against" response as a complete emergency-services approval. It is not. The question of whether adequate local fire, emergency, hazardous-materials, water-supply, access, evacuation and motorway-safety arrangements exist remains a material planning, human-health and public-safety issue requiring further information before any decision is made.

17.2 Responsibility for Emergency Planning and Response

Responsibility is divided between a number of bodies, and this division of responsibility is central to the objection.

First, the operator of a COMAH establishment is responsible for taking all necessary measures to prevent major accidents and to limit the consequences of any such accidents for human health and the environment. That responsibility includes the safe design and operation of the establishment, the identification of major accident hazards, the preparation and implementation of suitable safety-management arrangements, and the provision of information required by the competent authorities.

Secondly, the Health and Safety Authority is the Central Competent Authority for COMAH

and gives technical land-use planning advice. However, its role in the planning process is not the same as a full fire-service capacity audit, an emergency access audit, a local evacuation plan, or a confirmation that Galway County Council Fire and Rescue Service has the resources, water flow, specialist equipment, response time, training or site-specific procedures required to deal with an incident at this facility.

Thirdly, Galway County Council, including its fire service and emergency planning functions, is the local authority body responsible for local emergency planning and response arrangements. Galway County Council's own major emergency planning role covers events such as fires, transport accidents, hazardous-substance incidents and severe weather, and is designed to co-ordinate with An Garda Síochána and the HSE as principal response agencies. Fourthly, An Coimisiún Pleanála is the consent authority. It must be satisfied before granting permission that the planning application contains sufficient information to assess the environmental, human-health, public-safety, road-safety, emergency-access and proper-planning implications of the development. This obligation cannot be displaced by a general HSA letter where the HSA itself has directed attention to local emergency-service consultation.

17.3 The HSA Letter Does Not Resolve the Emergency-Response Question

The HSA letter is important because it identifies the limits of the HSA's own advice. It states that the application is covered by Regulation 24(2)(a) of the COMAH Regulations, namely the siting and development of a new establishment. It then states that, on the basis of the information supplied, the HSA has determined that the siting criteria for new establishments have been met and that it does not advise against the granting of permission in the context of major accident hazards.

However, the same letter also directs attention to the need to consult local authority emergency services on any potential impact on local access and egress arrangements, in the context of

public behaviour in the event of an emergency and access for emergency services, generally and in relation to fire prevention and response issues. That direction is highly material. It confirms that the HSA's response does not itself constitute a complete assessment of emergency access, public behaviour, local fire-service capacity or local response capability.

The HSA further states that, although the risks are considered sufficiently low, there is a possibility of a major accident to the environment and that external emergency plans by the local competent authorities should take account of these scenarios. This is not a minor qualification. It means that the competent authority must ask whether the local emergency plan has in fact taken account of the relevant credible accident scenarios and whether the necessary external emergency response arrangements exist at the location selected by the applicant.

The planning assessment should therefore have asked, at minimum, whether Galway County Council Fire and Rescue Service and emergency planning staff had been formally consulted on the final EIAR, the final site layout, the automated/remote-operation model, the single-access arrangement, the firewater supply, the contaminated firewater retention system, the motorway-interface risks, the grid-route road closures, and the credible worst-case scenarios identified for the COMAH establishment. No such clear confirmation is apparent from the planning material reviewed.

17.4 No Evidence of Consultation with Athenry or Galway Fire Officers

The observer is not aware of any consultation having taken place with the Fire Officer at Athenry, the Fire Officer in Galway, or Galway County Council Fire and Rescue Service in relation to this project. If such consultation has occurred, it has not been clearly identified in the planning material reviewed. This omission is particularly significant because the HSA letter does not merely leave the matter open; it specifically directs attention to the need to consult local authority emergency services on access and egress arrangements, public behaviour in an emergency, and fire prevention and response.

This means that the core practical emergency-response question remains unresolved. The Commission does not appear to have a formal local fire-service assessment confirming that the proposed single access route, water supply, hydrants, firewater storage, contaminated firewater retention, hazardous-materials arrangements, site familiarisation, response times, appliances, specialist equipment, motorway interface and evacuation arrangements are adequate for this facility.

The absence of local Fire Officer input cannot be cured by relying on the HSA's land-use planning advice. The HSA advises on major accident hazard risk in the COMAH land-use planning context. It does not confirm that the local fire service can safely and effectively respond to a fire, explosion, gas release, transformer fire, diesel-tank incident, propane incident, contaminated firewater event, or simultaneous motorway/local-road emergency at this location.

For these reasons, the failure to obtain and publish local fire-service consultation is a material assessment gap. It should have been addressed before the Planning Authority formed its view under section 37E(4) and before An Coimisiun Pleanála is asked to determine the application.

17.5 Automated or Remotely Operated Facility: Increased Need for Clear Emergency Procedures

The proposed facility is described in the EIAR as being remotely controlled where possible, with only a small number of staff normally expected on site. The EIAR indicates that the normal on-site population may comprise maintenance and security personnel, with a limited maximum number of persons present at any one time. The automated or remote-operation model creates a distinct emergency-planning issue.

If a major incident occurs when the facility is unmanned or lightly staffed, the assessment must clearly identify who receives the first alarm, where that alarm is received, who has authority to initiate shutdown or isolation, how quickly trained site personnel can attend, how emergency

services gain access, how they obtain site-specific hazard information, and who acts as on-site liaison with the fire service. It should also identify whether local emergency services have received site familiarisation, whether mock exercises are required, and whether remote operators can safely direct emergency responders during a dynamic event.

The EIAR describes technical systems such as detection, suppression and isolation, but this is not the same as proving the adequacy of emergency response. Automated systems may fail, alarms may require human interpretation, fire-suppression systems may not control every credible event, and emergency services may require specialist information before entering a site involving gas, diesel, propane, transformers, electrical infrastructure and contaminated firewater risks. A remotely operated COMAH facility therefore requires particularly clear emergency governance before consent.

17.6 Fire and Emergency Measures Described in the EIAR

The EIAR identifies several proposed fire and emergency measures. These include automatic fire detection, gas-based fire suppression in certain electrical/control buildings, automatic isolation of electrical supply and turbine fuel supply where fire is detected, a water-deluge system for equipment containing flammable liquids, a fire-main system, hydrants, a firewater and service-water tank, emergency diesel generation for controlled shutdown and basic services, and contaminated firewater retention for firefighting water and stormwater. These measures are welcome in principle.

However, the existence of on-site systems does not remove the need for external emergency response. The Commission must ask whether the design is sufficient in real operational circumstances, particularly if an incident occurs when the plant is unmanned or has only security or maintenance personnel present. The assessment should not assume that on-site systems eliminate the need for local response capacity.

The EIAR should therefore be required to demonstrate, with confirmation from Galway County

Council Fire and Rescue Service, that the proposed firewater volume and hydrant arrangements are sufficient for the credible worst-case events, that local appliances can connect to and use the system, that sufficient foam or specialist extinguishing media is available where required, that firefighters can safely approach and operate around transformers, fuel tanks, gas systems and electrical equipment, and that contaminated firewater can be safely contained and removed without environmental release.

17.7 Single Access Route: No Alternative Route In or Out

A central deficiency is that the proposed facility appears to have only one route in and out: the proposed access road connecting to the L3103. No independent secondary emergency access route is identified. This is a fundamental safety issue for a COMAH-type site and for a major energy facility located beside the motorway network.

A single access route creates obvious vulnerabilities. The access road could be blocked by a collision, an abnormal load movement, a fire appliance, security gate failure, flooding, debris, a fallen tree, construction traffic, road works, grid-connection trenching, emergency evacuation traffic, or smoke/fire conditions at or near the site entrance. If the single entrance is blocked, emergency services may be delayed or prevented from entering, and site personnel or contractors may be delayed or prevented from leaving.

This issue is compounded by the fact that the grid connection works are proposed within the local road network and may require road closures, traffic management, trenching, joint bay construction, cable pulling, HDD works and reinstatement. Emergency access during those works cannot be treated as a paper exercise. If the same local roads are affected by construction closures or future cable-maintenance works, the single access arrangement to the facility becomes even more material.

The EIAR should therefore have included a site-specific emergency access audit addressing the absence of any alternative access route. It should have shown how fire appliances,

ambulances, Garda vehicles, specialist hazardous-materials response and evacuation vehicles would reach the site if the L3103 approach or the site access road is unavailable. It should also have assessed the implications for local residents if emergency services need to use the same constrained road network during a site incident.

17.8 Danger to the Motorway Network Must Be Considered

The proposed site is located immediately beside the M6, M17 and M18 motorway network. The motorway is not merely a background feature. It is a high-speed national transport corridor and is physically close to the proposed plant, access arrangements, grid connection, motorway HDD crossings and abnormal-load route. Any major accident, fire, smoke plume, explosion, glare, emergency response activity, traffic-management failure or hazardous-substance incident at the site has the potential to create risk for motorway users and for the strategic function of the national road network.

The danger to the motorway network should be considered under at least five headings. First, a major fire, smoke plume or explosion could distract drivers, reduce visibility, create panic braking or require emergency closure of motorway lanes. Secondly, glare, external lighting, emergency lighting or flaring-like effects during an incident could distract road users, particularly at night or during poor weather. Thirdly, emergency response activity could require traffic controls, temporary closures or access restrictions on nearby local roads and motorway interfaces. Fourthly, contaminated firewater, foam, fuel, hydrocarbons or other pollutants must not enter motorway drainage systems or nearby groundwater pathways. Fifthly, the three HDD crossings and any future maintenance of those crossings create permanent interface risk with motorway infrastructure.

TII has already made clear in its planning observations that it has not granted consent for works within the motorway reservation and that motorway safety, lighting, HDD crossing requirements, national road asset protection, and reinstatement are material matters. This

reinforces the submission that motorway danger is not speculative. It is a foreseeable planning and safety issue arising from the site chosen by the applicant.

The planning authority and the Commission should not assess major accident hazards by looking only inward at the site boundary. A major accident beside a motorway may have off-site public-safety consequences even if the predicted individual risk contours are said to be acceptable. Public behaviour, driver reaction, evacuation routes, emergency-service access, smoke management, traffic closure procedures and motorway drainage protection should all be considered before permission is granted.

17.9 Firewater, Contaminated Firewater and Karst/Groundwater Risk

The EIAR proposes contaminated firewater retention. This is necessary, but it does not by itself resolve the environmental risk. The site and cable route are located in a limestone and karst-influenced environment, and the project documentation identifies groundwater vulnerability and potential hydrogeological pathways to European sites. A major fire or emergency event involving diesel, lubricating oil, transformer oil, propane, firefighting foam, smoke residues or contaminated runoff could have consequences beyond the site if containment fails, if valves malfunction, if water overtops containment, if emergency responders need to use additional water, or if damaged infrastructure allows contaminated water to enter ground, drains or karst pathways.

The question is not whether the applicant has designed a theoretical contaminated-firewater system. The question is whether that system has been assessed against credible emergency conditions, including delayed response, unmanned operation, simultaneous rainfall, equipment failure, blocked access, extended firefighting, transformer fire, tank fire, deluge operation, power loss, and the need for off-site removal by tanker. These matters are relevant to public safety, environmental protection, Water Framework Directive assessment and Appropriate Assessment.

17.10 Interaction with Grid-Connection Road Closures and Emergency Access

The grid connection is not a separate practical concern. It is part of the overall project's emergency-access context. The proposed 220 kV underground grid connection requires extensive works along local roads, including trenching, joint bays, traffic management, road closures, HDD crossings and future maintenance access. During construction, and potentially during future maintenance or fault repair, emergency access for local residents and for the Peaker Plant itself could be affected.

The EIAR should not simply state that road plates can be placed over trenches or that traffic-management equipment can be moved to allow emergency vehicles through. That approach may be suitable for ordinary road works, but it is not sufficient for a project involving a COMAH establishment and a single site access. The assessment should show how emergency access will be guaranteed at all times, including during simultaneous construction activities, abnormal-load deliveries, grid-connection works, local road closures, motorway incidents, or major accident scenarios at the site.

This is especially important because local communities, farms, residents, schools, vulnerable persons and emergency services depend on the same rural road network. The planning assessment should have tested whether the combined plant and grid-connection works could impede emergency access or delay response during an incident.

17.11 Galway County Council Planning Assessment Did Not Resolve the Issue

Galway County Council's planning report recognises that the development will be a lower-tier COMAH establishment and notes the need for other licences and consents, including a Fire Safety Certificate and other statutory approvals. However, the report does not appear to provide a substantive assessment of whether local fire and emergency services have adequate resources, specialist equipment, response times, training, water supply, evacuation arrangements,

motorway liaison procedures or site-specific emergency plans for this particular development. It also does not identify any formal consultation response from the Fire Officer at Athenry, the Fire Officer in Galway, or Galway County Council Fire and Rescue Service addressing the final application.

It is not sufficient to say that the HSA does not advise against permission. Galway County Council, as the local authority with fire and emergency planning responsibilities, was specifically the body whose emergency services should have been consulted on access/egress, public behaviour, fire prevention and fire response. The HSA letter points toward that local assessment; it does not replace it. On the material reviewed, that local assessment has not been provided.

The absence of a clear local emergency-services assessment is particularly serious given the single access route, the site's proximity to the motorway network, the automated/remote-operation model, the lower-tier COMAH status, the hazardous substances present, the firewater and contaminated firewater issues, and the grid-connection road works. These matters should have been assessed in a joined-up way under population and human health, major accidents and disasters, roads and traffic, water, land/soils/geology, material assets and proper planning. They should also have been specifically referred to the local Fire Officer before any conclusion was reached that adequate emergency response arrangements exist.

17.12 Information Required Before Any Decision

The Commission should require further information before any decision is made. At minimum, the applicant should be required to provide the following, with formal input from Galway County Council Fire and Rescue Service, Galway County Council Emergency Planning, TII, An Garda Síochána, the HSE and relevant environmental authorities:

- A site-specific fire and emergency response assessment for the lower-tier COMAH establishment.

- Formal confirmation from Galway County Council Fire and Rescue Service that the proposed access, water supply, hydrants, firewater volumes, specialist equipment and response arrangements are adequate.
- Copies of all correspondence, consultation requests and responses between the applicant, Galway County Council, An Coimisiun Pleanála, the Fire Officer at Athenry, the Fire Officer in Galway and Galway County Council Fire and Rescue Service concerning the proposed development.
- A single-access vulnerability assessment, including the consequences of the proposed access road or L3103 being blocked.
- A clear explanation of who receives alarms, where remote control is located, how shutdown/isolation occurs, and how quickly trained personnel can attend the site.
- A site-specific emergency plan addressing fire, explosion, gas release, transformer fire, diesel/fuel tank incident, propane incident, contaminated firewater, power loss, security incident and environmental release.
- A motorway-safety assessment addressing smoke, flame, glare, distraction, emergency closures, motorway drainage, driver behaviour, TII liaison and risks to users of the M6, M17 and M17.
- A hazardous-materials response assessment identifying whether local responders have appropriate training, PPE, foam/suppression capability and site knowledge.
- An evacuation/shelter-in-place assessment for nearby residents, farms and road users.
- A construction-phase and grid-connection emergency-access plan guaranteeing emergency access during road closures, trenching, HDD works, joint bay construction, cable pulling and future maintenance.
- A contaminated firewater failure-mode assessment, including simultaneous rainfall, extended firefighting, containment failure and tanker removal logistics.

- A pre-commissioning requirement for a multi-agency emergency exercise involving the operator, Galway County Council, Fire and Rescue Service, An Garda Síochána, the HSE and TII.

17.13 Requested Finding

The Commission is requested to find that the application and Galway County Council planning assessment do not adequately demonstrate that major accident, fire, emergency access, local fire-service capacity, motorway safety and external emergency-planning issues have been resolved. The HSA's letter does not cure this deficiency. The HSA does not advise against the siting of the establishment on major-accident-risk grounds, but it expressly points to the need for local emergency-services consultation and to the role of external emergency plans. On the information available to the observer, there is no evidence that the Fire Officer at Athenry or Galway County Council Fire and Rescue Service has been formally consulted on the final proposal.

The proposed development has only one identified route in and out of the facility. No alternative emergency access route is shown. The site is beside the strategic motorway network. The plant is intended to be automated or remotely operated for much of its operation. The grid connection will affect local roads during construction and potentially during future maintenance. These factors create a materially different risk profile from an ordinary industrial development and require a much more robust emergency-planning assessment.

In the absence of clear evidence that adequate local emergency services, fire response, access, evacuation, contaminated firewater, motorway protection and multi-agency emergency arrangements exist, permission should be refused or, at minimum, further information should be required and made available for public consultation before any decision is made.

17.14 References

- Health and Safety Authority letter to An Coimisiun Pleanala, 22 April 2026, ACP-324113-26 / CAS-96385-L1P6, including the direction that attention be given to consultation with local authority emergency services on access/egress, public behaviour in an emergency, and fire prevention and response.
- Cashla Peaker Plant Environmental Impact Assessment Report, Volume 2 - Main EIAR, including Chapter 15: Major Accidents and Disasters, and related project-description/firewater sections.
- Galway County Council section 37E(4) report on ACP-324113-26.
- Transport Infrastructure Ireland observations on ACP-324113-26.
- Chemicals Act (Control of Major Accident Hazards Involving Dangerous Substances) Regulations 2015, S.I. No. 209 of 2015.
- Fire Services Act 1981 and Galway County Council Major Emergency Management information.