

Elgin Energy Services Ltd

Planning Report: Pre-Application Consultation under Section 182E

Proposed 110kV Substation and Associated Grid Connection
Infrastructure



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1.0 Introduction

1.1 Purpose and Scope of Report

Tetra Tech has been instructed by the Prospective Applicant, Elgin Energy Services Ltd., to prepare this planning report to inform section 182E pre-application consultation with An Coimisiún Pleanála (ACP or the Commission) under the provisions of the Planning and Development Act 2000 as amended (herein referred to as 'the Act'). The pre-application consultation relates to a proposed electricity transmission development for which it is intended approval will be sought from ACP under section 182A of the Act.

The proposed development comprises a 110kV substation and associated infrastructure to serve and connect a permitted solar farm (Galway County Council (GCC) **Reg Ref. 23/60875**) to the National Grid. The permitted solar PV farm is located on a site of c. 107.4ha and has a maximum export capacity of 75MW of electricity. The proposed substation and associated infrastructure and the permitted solar farm are located near Creggs village, County Galway. The Prospective Applicant, Elgin Energy Services Limited, was also the applicant for the solar farm permission Reg. Ref. 23/60875.

Under section 182E of the Act, ACP may give advice to a Prospective Applicant regarding procedural matters and also regarding what considerations, related to proper planning and development or the environment, may, in the Commission's opinion, have a bearing on its decision.

In accordance with the provision of Section 182E, we are seeking advice from ACP in respect of two key matters.

- Firstly, with regard to procedural matters, we seek confirmation from the ACP that the proposed development comprises of electricity transmission development for which planning approval should be sought under section 182A of the Act.
- We seek advice from ACP on what considerations it considers may have a bearing on its decision in due course and accordingly on what information the Commission considers should be submitted as part of the application under section 182A.

The purpose of this report is to inform ACP of relevant information for the purposes of the consultation, to set out the details that are to be confirmed following the submission and consenting of the proposed development and to assist it in the preparation of its advice. It is submitted that the information presented in this report along with the accompanying *Report to Inform Environmental Impact Assessment (EIA) Screening* and drawing pack present sufficient information to ACP as required under section 182E(4) of the Act to enable it to consider the proposed development and provide advices as requested.

This report therefore sets out a description of the proposed development and its purpose.

Furthermore, it sets out the reasons why the Prospective Applicant considers the development to comprise of electricity transmission development and why it should be subject of approval procedures under section 182A.

Finally, the report describes the planning and environmental context of the development site and surrounds. On the basis of these provisions the report presents a proposed content of the subsequent application to ACP for approval.

2.0 Description of the Proposed Development and Site Context

2.1 Background to and Reason for the Proposed Development

On 8th February 2024 GCC granted a 10 year planning permission under Planning Reg. Ref. 23/60875 for development described as follows:

“development of a solar PV farm at a site in the townlands of Cuilnacapp, Park, Moneenroe, and Gortnalavey, near Creggs village, Co. Galway. The solar farm will have an operational lifespan of 40 years and a maximum export capacity of 75MW of electricity. The development will comprise the installation of photovoltaic panels on ground mounted frames in rows, ancillary cabling and electrical infrastructure including approx. 18 no. inverter station locations (with option for two stations at each location), ducting and underground cabling; provision of new internal access tracks; storage containers; perimeter fencing, pole mounted CCTV cameras; vehicular access via 2 No. access points, one comprising an upgrade of an existing agricultural access directly to the L2316 and one via an upgraded existing private road which adjoins the L2316 adjacent to its junction with the R362; proposed new passing bay on this private road; 1 No. further alternative vehicular access point at a new vehicular entrance to the L2316; and all associated site development and landscaping works. All on a site of approx. 107.4ha.”

As set out in that application, it was intended to connect the solar farm to the Grid via a 110kV onsite substation and a loop-in loop-out 110 kV cable from the substation to an existing 110 kV line from Lanesboro to Cloon line which traverses the solar farm site. As it was considered that the substation and loop-in loop out infrastructure would comprise ‘transmission’ infrastructure, it was noted that it could not be incorporated in the section 34 application for the solar farm to GCC and would have to be subject of a separate consent application under section 182A of the Act in due course.

The drawing package provided with the application under Planning Reg. Ref. 23/60875 identified the approximate location for the future 110kV substation proposal. It also incorporated some indicative design proposals for the 110 kV substation. This was to allow the Planning Authority to be aware of the likely future combined development content. It was advised to GCC that the indicative designs would be further revised and refined for the purpose of the section 182A application in due course with the appearance of the substation also potentially being modified further prior to construction depending on the final requirements of, and agreement with Eirgrid.

2.2 Site Location

The proposed 110kV substation and associated overhead infrastructure are located in the townlands of Cuilnacapp, Park and Moneenroe, near Creggs village, County Galway. **Figure 2.1** below shows the general location of the proposed substation in red, in the context of the permitted solar farm which it will serve (outlined in blue) and the wider surrounding context. The subject site is in a rural area, approximately 900m southeast of the village of Creggs in northeast Galway.

The substation and associated overhead infrastructure connecting to the existing National Grid will be located within the application site boundary of the permitted solar farm, as shown in **Figure 2-2**.

Creggs 110kV Substation

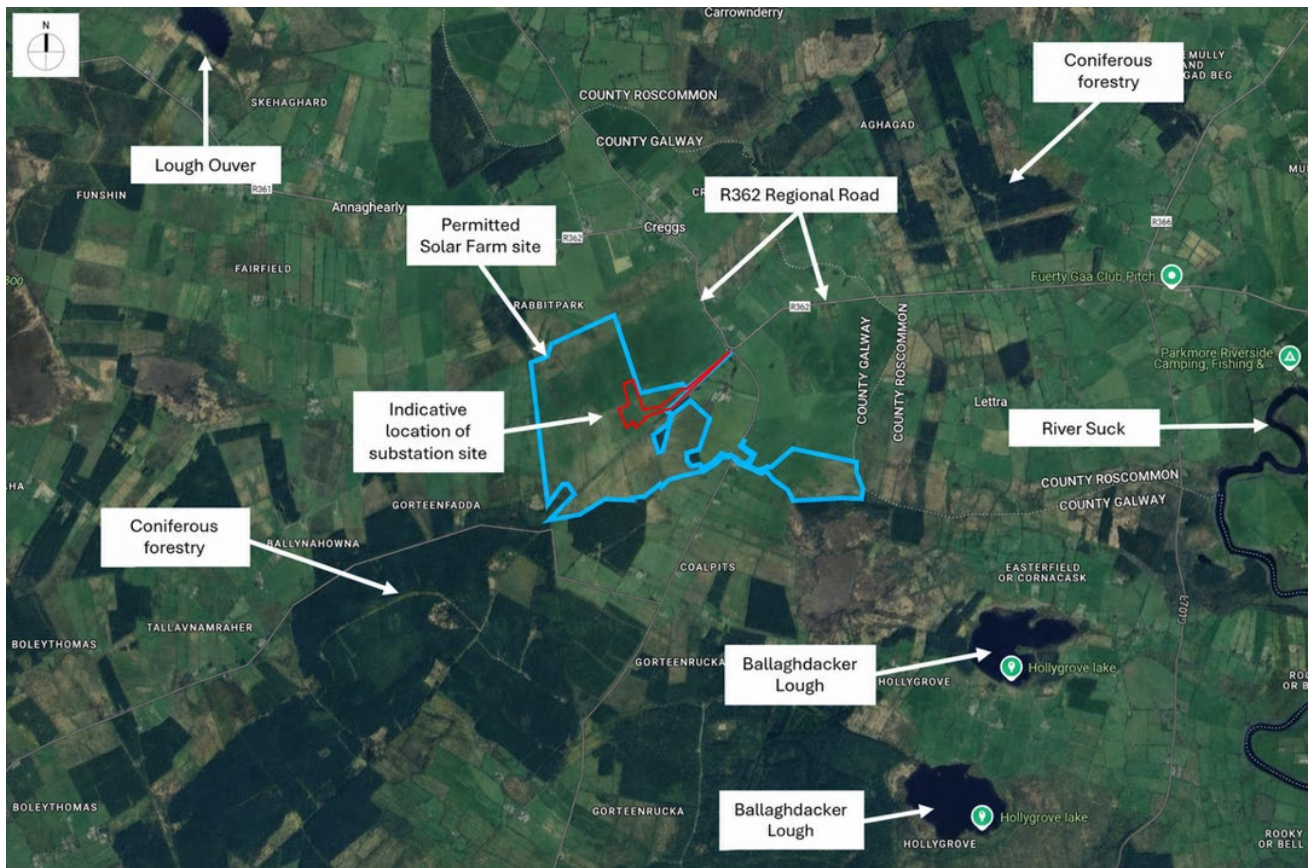


Figure 2-1: Aerial Photo Identifying Approximate Location and Extent of Site of Proposed 110kV Substation

Source: Google Maps (annotations added by Tetra Tech)

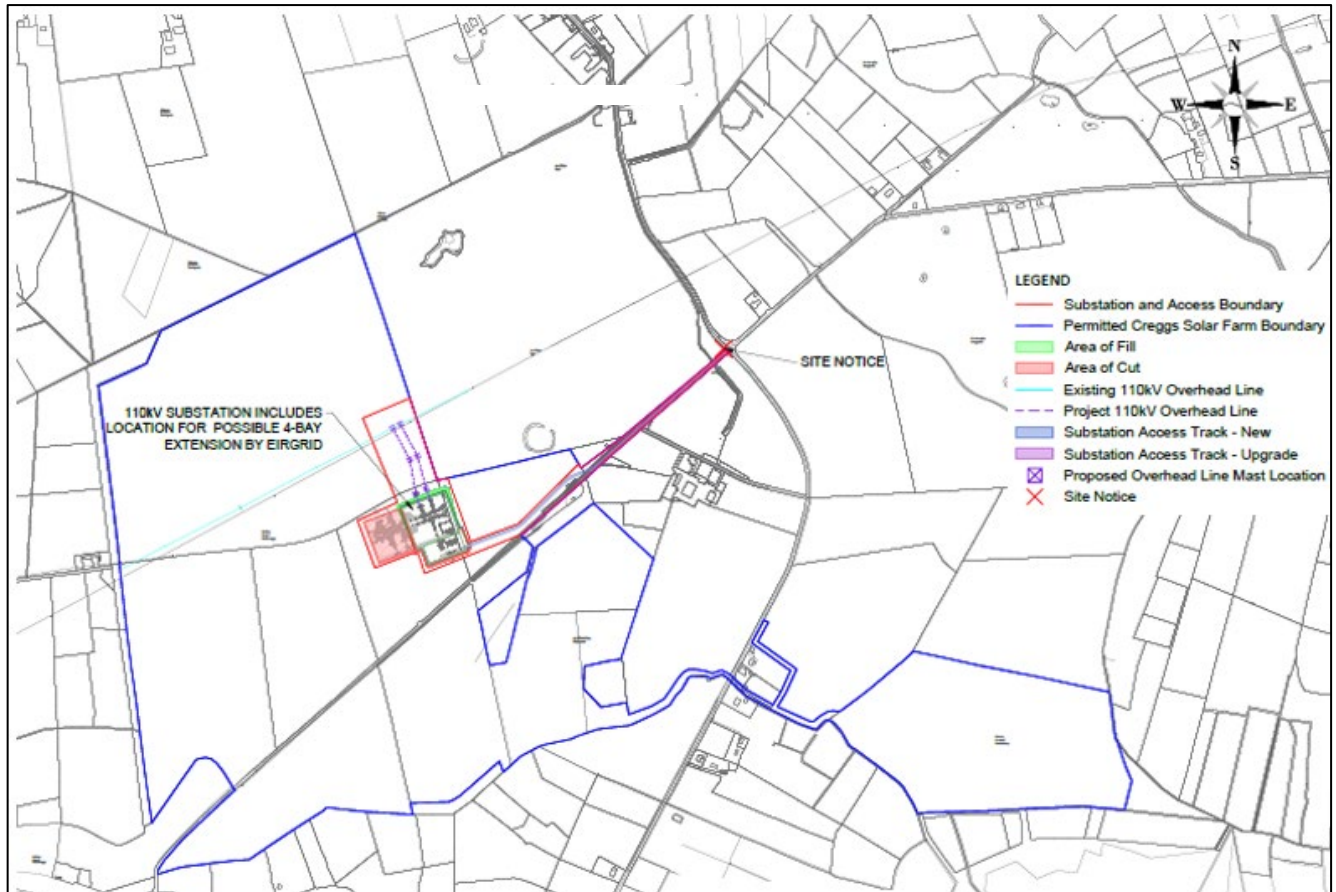


Figure 2-2: Site Location Map

Source: Site Location Map by Afry Ireland Ltd (Drwg no. CREG d001.1.1)

2.3 Proposed Development Description

2.3.1 General Content of Proposed Development

The proposed development comprises a 110kV C-type electricity substation and associated loop-in infrastructure to tie into an existing 110kV overhead transmission line. The following sections set out a description of various elements of the proposed development. Further details are presented within accompanying drawings also forming part of the pre-application consultation submission to ACP.

The proposed development comprises a number of elements as set out below:

- 110kV C-Type substation compound (including Eirgrid compound (110kV) and customer compound (MV));
- Loop in proposal to connect to the national grid;
- Fencing;
- Vehicular access from public road via upgraded existing private road and new access track;
- Landscaping;
- Lighting;
- Temporary construction compound (location to be determined); and
- Surface water drainage proposals.

On completion of the substation and loop in construction, ownership of the line and the 110kV compound will transfer to EirGrid. The MV customer compound (IPP Compound) within the overall substation development will remain in the ownership of the solar farm operator. The proposed site layout is shown in **Figure 2.3**.

It can be seen that there is an open area to the west of the proposed substation. Provision of such an adjacent open area is a standard requirement of Eirgrid for 4 bay 110kV substations, in the event that there is a need in the future to expand to an 8 bay substation. Any such potential future requirement by EirGrid would of course have to be consented under a separate consenting process.

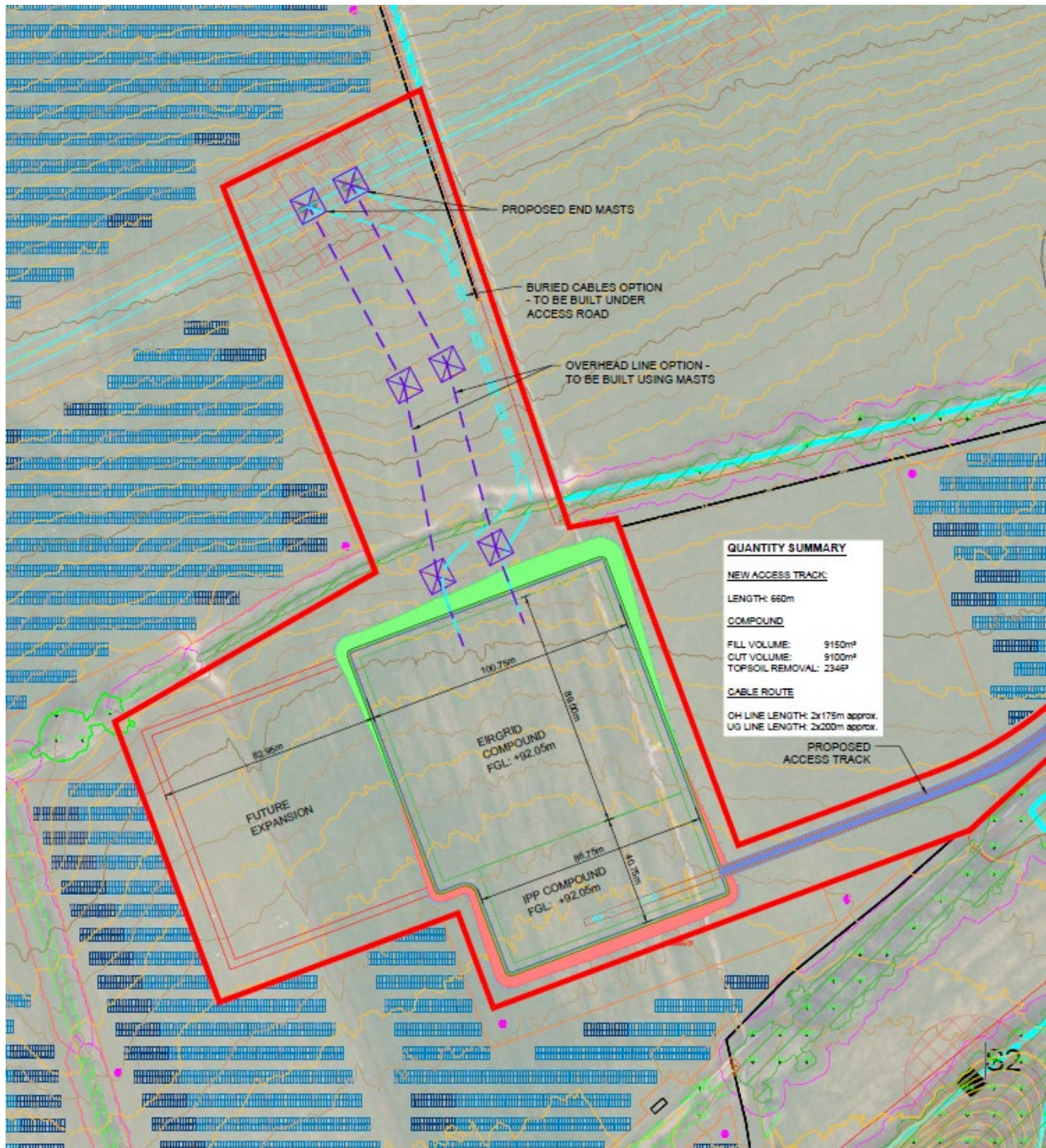


Figure 2-3: Proposed Site Layout

Source: Proposed Substation Compound Platform Optimisation – Option A by Afry Ireland Ltd (Drwg No. CREG.d005.1.1)

2.3.2 110kV C-Type Substation Compound

Figure 2-4 below and the accompanying Drawing No. ELGIN-SUBSTATION-006 presents a Conceptual Design of an EirGrid Layout Plan for a C-Type 110kV substation with 4 bays. This illustrates an indicative layout for the proposed Type-C substation, and it is expected the final layout and design will be confirmed prior to the application being lodged with ACP.

The overall C-Type substation compound will consist of an area of the order of 13,000 m² that will be split into two areas consisting of an EirGrid C-Type Station compound and a customer compound.

The customer compound will incorporate a Medium Voltage (MV) switchgear room. The MV electricity generated at the solar farm will be increased to 110kV via a 110kV transformer within the customer compound. The electricity will then travel on to the EirGrid 110kV substation which will comprise of a Control Building and electrical infrastructure. From the EirGrid 110kV compound electricity can be exported at to the existing 110kV transmission network.

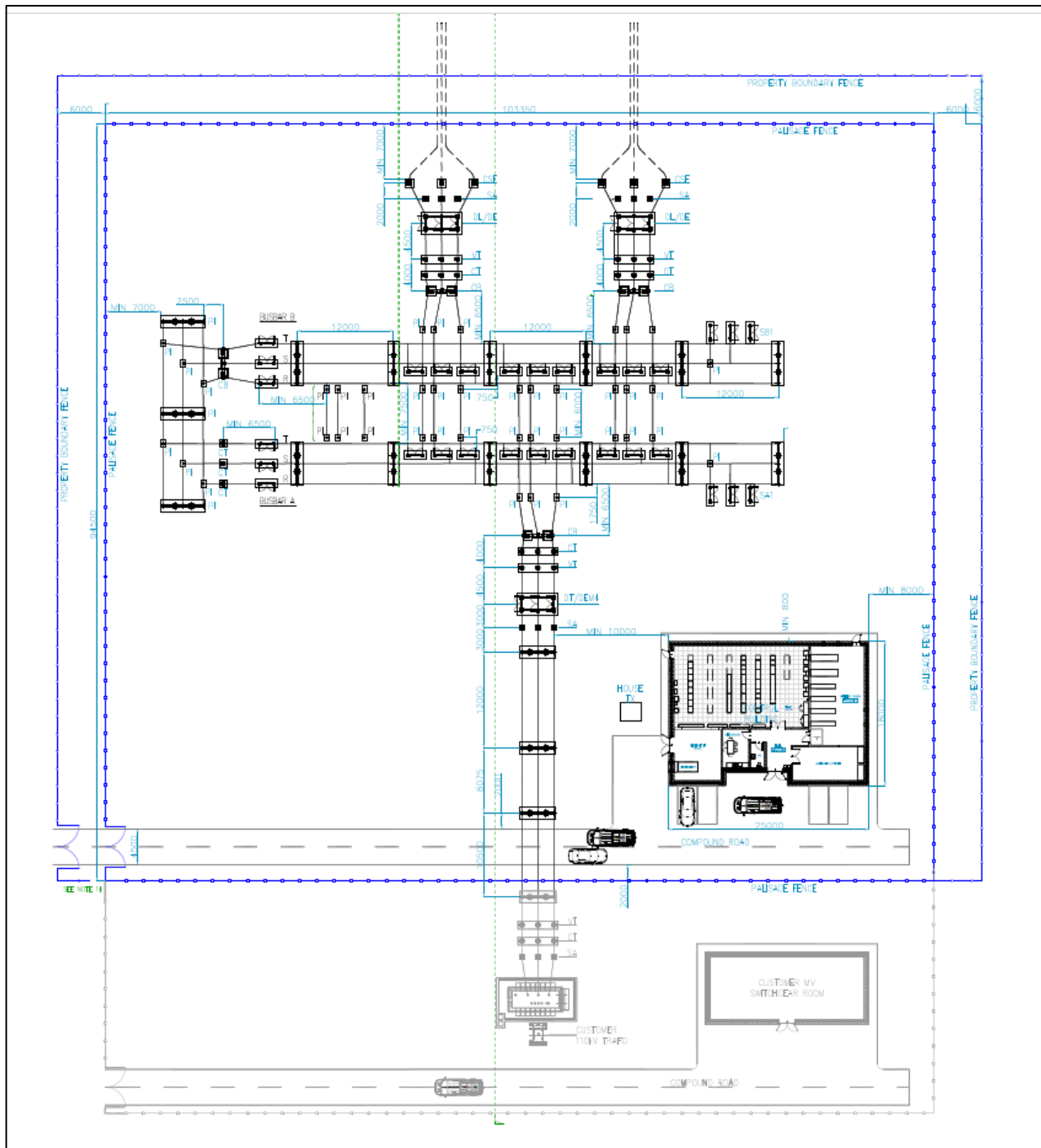


Figure 2-4: Typical Layout of a C-Type Substation

Source: 110kV Substation Sheet 1 Drawing prepared by Elgin

2.3.3 Loop In proposals to connect to the national grid

There is an existing 110kV OHL electricity transmission line that travels across the northern part of the site of the permitted solar farm. This line runs from Lanesborough in County Longford to Cloon in County Galway.

It is proposed to break the existing 110 kV overhead line and loop in and out of it a connection to the proposed substation. The Prospective Applicant is currently considering both an underground and an overhead option for making making this loop in loop out connection. These are both identified on the accompanying drawings by Afry showing the proposed site layout (Drwg No. CREG.d005.1.0 Proposed Substation Compound Overview – Option A and Drwg. No. CREG.d005.1.1 Proposed Substation Compound Platform Optimisation – Option A).

For the overhead option, two new end towers 15 – 30m high will form a break in the existing line. The exact height of the towers shall be defined within the application. From these new towers the 110kV OHL to be rerouted into and out of the new substation. The overhead conductor which will be supported by two new pairs of towers before it reaches the proposed substation compound. The three new pairs of towers shall be secured in concrete foundations, the exact specifications of which shall be determined at a later stage subject to ground conditions and electrical load calculations.

An anti-climb guard shall be provided on each tower for security.

Figure 2-5 and EirGrid Drawing ELGIN-TOWER-001 enclosed present a typical detail of the 110kV end towers.

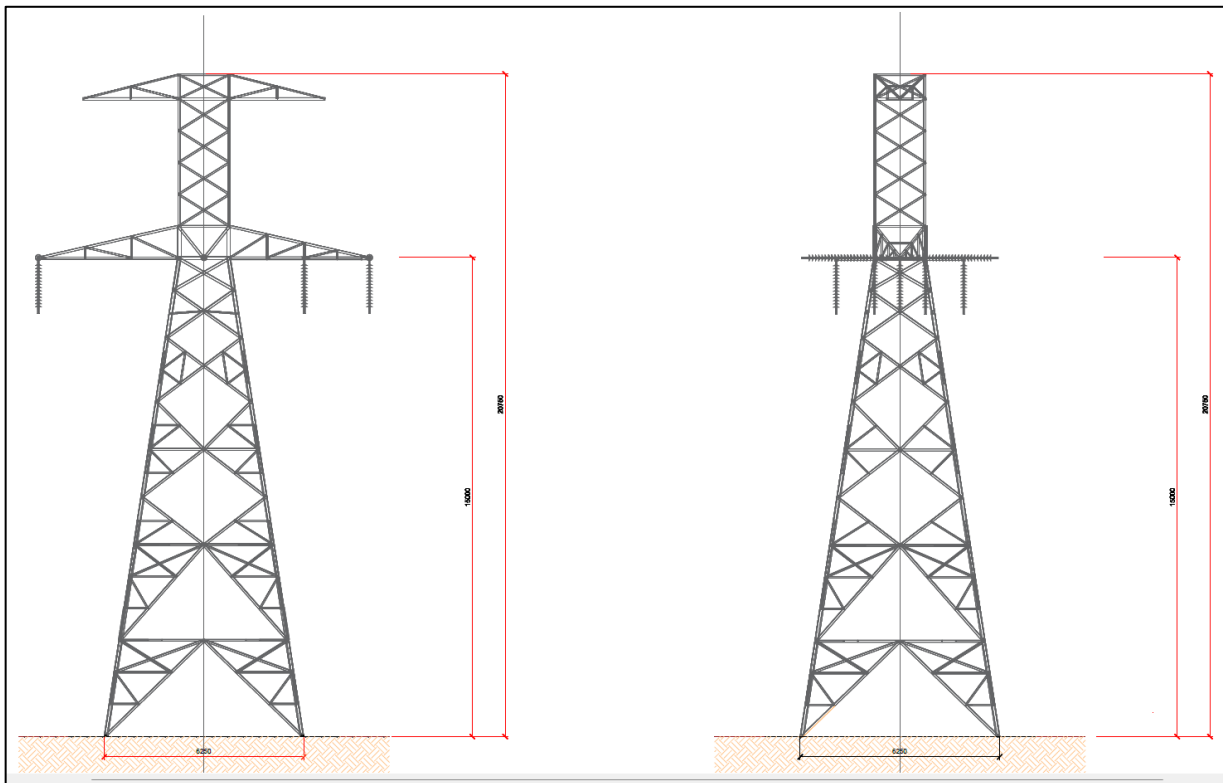


Figure 2-5: Typical Overhead Line Interface Tower

Source: Typical 110kV Overhead Line Interface Tower Drawing prepared by Elgin

2.3.4 Access

Access to the north and west portions of the solar farm as permitted under Planning Reg. Ref. 23/60875 will be via an up upgraded existing private road which adjoins the L2316 adjacent to its junction with the R362. This existing private road currently provides access to Creggs House and agricultural lands only. Creggs House and associated farm buildings are the property of the landowner of the permitted solar farm site. A new passing bay on the private road was permitted under Planning Reg. Ref. 23/60875.

Access now proposed to the substation will be from the same private road junction with the L2316 as identified in the solar farm application. However, a new access track will be formed off the permitted track turning northwest approx. 360m in from the L2316 junction. This new access will serve the proposed substation. The proposed access will be 4.5m wide.

2.3.5 Fencing

The proposed substation development will be located within the overall solar farm development as permitted under GCC Reg. Ref. 2360875 and therefore will benefit from the security function of the permitted perimeter

boundary fencing arrangements surrounding the overall solar farm site. Given the additional access track proposed for the fencing will be extended to include this area.

Palisade fencing is proposed around the entire substation compound as shown in EirGrid Drawing No. ELGIN-SUBSTATION-006 to provide specific security and protection for the substation infrastructure. The customer compound will also be physically separated from the EirGrid side of the compound by further palisade fencing.

2.3.6 Lighting

There will be lighting provided within the substation site which can be turned on if necessary. However, the substation will be operated remotely and will not have a daily presence on site that would require regular lighting. Lighting will be switched on infrequently if necessary for maintenance purposes.

2.3.7 Temporary Construction Compound

A temporary construction compound will be required for the substation construction. It is likely that the contractor for the substation will be different to the contractor for the solar farm construction and that separate construction compounds will be required.

The compound for the substation will be located within or adjacent to the application site with the exact location being confirmed by the contractor when appointed.

The compound will be removed after works on site are completed.

2.3.8 Surface Water Drainage Proposals

Run off from building roofs within the compound will be directed to soakaways within the compound footprint. Run-off from any impermeable surfaces within the compound, such as plant slabs and plinths, will be 'over-the-edge' to impermeable surfaces for filtration to ground.

3.0 Appropriate Approval Route for Proposed Substation

3.1 Legal Provisions of Section 182A(1) of the Act

The development subject of this pre-application consultation under section 182E comprises of a 110kV C-type station looped into the Lanesborough to Cloon 110kV overhead circuit. We set out hereunder the reasons why we consider the appropriate consent route for same to be an application under section 182A of the Act.

Section 182A — (1) of the Act provides as follows:

“Subject to subsection (1B) and section 182AA, where a person (hereafter referred to in this section as the “undertaker”) intends to carry out development comprising or for the purposes of electricity transmission, (hereafter referred to in this section and section 182B as “proposed development”), the undertaker shall prepare, or cause to be prepared, an application for approval of the development under section 182B and shall apply to the Board for such approval accordingly.”

Section 182A – (9) describes what ‘transmission’ development comprises of. It states that:

“(9) In this section “transmission”, in relation to electricity, shall be construed in accordance with section 2(1) of the Electricity Regulation Act 1999 but, for the purposes of this section, the foregoing expression, in relation to electricity, shall also be construed as meaning the transport of electricity by means of—

- (a) a high voltage line where the voltage would be 110 kilovolts or more, or*
- (b) an interconnector, whether ownership of the interconnector will be vested in the undertaker or not.”*

The definition of ‘transmission’ under section 2(1) of the Electricity Regulation Act 1999 as amended is as follows:

“transmission”, subject to section 2A, in relation to electricity, means the transport of electricity by means of a transmission system, in the State or offshore, or both, that is to say, a system which consists, wholly or mainly, of high voltage lines and electric plant and which is used for conveying electricity from a generating station to a substation, from one generating station to another, from one substation to another or to or from any interconnector or to final customers but shall not include any such lines which the Board may, from time to time, with the approval of the Commission, specify as being part of the distribution system but shall include any interconnector owned by the Board.”

“electric plant” is in turn defined as:-

“Electric plant” means any plant, apparatus or appliance used for, or for purposes connected with, the generation, transmission, distribution or supply of electricity, other than—

- (a) an electric line,*
- (b) a meter used for ascertaining the quantity of electricity supplied to any premises, or*
- (c) an electrical appliance under the control of a consumer;”*

With reference to these definitions, it is considered that the 110kV substation and the loop in infrastructure comprise of ‘electric plant’ and ‘transmission’ under the Electricity Regulation Act 1999, and accordingly of development for the ‘purposes of electricity transmission’ under section 182A of the Planning and

Development Act. Accordingly, the provisions of section 182A apply to the proposed substation and loop in grid connection development.

3.2 Physical Nature of the Development

The proposed loop-in connection to the existing 110kV line requires a break to be made in the existing 110kV line with the installation of two new end lattice steel line/cable interface towers circa 24m high. The 110kV line will be rerouted into and out of the new substation by means of an overhead line running from the new towers to specialist steel structures within the substation compound, and a deviation of the 110kV line between these points into the proposed new substation.

This form of connection to the Grid then means that electricity travelling via the Lanesborough to Cloon 110KV circuit will be routed through the proposed new substation. The substation will become a new substation node on the national transmission network; forming an integrated part of the network.

3.3 Intent of Planning and Development (Strategic Infrastructure) Act, 2006

It is acknowledged that some developments might fall within a literal interpretation of section 182A(1) while their role in transmission might in fact be considered minor or not strategic in nature.

In this regard, it is noted that section 182A of the Act was inserted by section 4 of the Planning and Development (Strategic Infrastructure) Act, 2006 (referred to also hereafter as ‘the 2006 Act’).

The purpose of the 2006 Act is set out in the long title as follows:

“An Act to provide, in the interests of the common good, for the making directly to An Bord Pleanála of applications for planning permission in respect of certain proposed developments of strategic importance to the State; to make provision for the expeditious determination of such applications, applications for certain other types of consent or approval and applications for planning permissions generally; for those purposes and for the purpose of effecting certain other changes to the law of planning and development to amend and extend the Planning and Development Acts 2000 to 2004; to amend the Transport (Railway Infrastructure) Act 2001 and the Acquisition of Land (Assessment of Compensation) Act 1919 and to provide for related matters.”

From the long title of this Act then, the purpose of section 182A is to provide special approval procedures for electricity transmission development which is of ‘strategic importance to the State’.

3.4 Strategic Importance of the Proposed Development

Section 182A does not include any criteria to test or assess the ‘strategic importance’ of electricity transmission development. However, it is noted that section 37A(2) of the Act does provide a number of such criteria for Seventh Schedule development (section 37A). These criteria present a useful reference to aid consideration of this matter in respect of electricity transmission development.

The criteria under section 37A(2) are as follows:

“(a) the development would be of strategic economic or social importance to the State or the region in which it would be situate,

(b) the development would contribute substantially to the fulfilment of any of the objectives in the National Planning Framework or in any regional spatial and economic strategy in force in respect of the area or areas in which it would be situate,

(c) the development would have a significant effect on the area of more than one planning authority.”

If in the opinion of ACP, the proposed development would, if carried out, fall within one or more of the criteria above, the proposed development would constitute SID.

With reference to criteria (b) in particular, it is submitted that the proposed development would be of strategic importance to the State by reason of contributing substantially to the fulfilment of objectives of *the National Planning Framework First Revision 2025*, and the *Regional Spatial and Economic Strategy for the Northern and Western Region 2020-2032* as explained further below.

3.4.1 National Planning Framework First Revision (NPFFR)

The *National Planning Framework First Revision* (hereafter referred to as NPFFR) was approved by the Oireachtas on the 30th April 2025. The NPFFR maintains support for renewable energy and the transition to a low carbon economy which was set out in the original National Planning Framework (NPF) of 2018. The NPFFR supports the provision of renewable energy as a means to reduce dependency on fossil fuels. This is through a series of National Policy Objectives (NPO's) throughout the NPFFR. The NPFFR also states that:

“In the energy sector, transition to a carbon neutral economy from renewable sources of energy is an integral part of Ireland’s climate change strategy and renewable energies are a means of reducing our reliance on fossil fuels.”

NPO 70 in the NPFFR is an objective to:

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

NPO 71 in the NPFFR seeks to:

“Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development.”

The policies and objectives contained within the NPFFR recognise the importance of increasing renewable energy generation and the upgrade of the electrical grid to support this.

3.4.2 Relevant Policies and Objectives of the Northern & Western Regional Assembly Regional Spatial and Economic Strategy 2020-2032

The *Northern & Western Regional Assembly Regional Spatial and Economic Strategy 2020-2032* (hereafter referred to as RSES) transposes policies and objectives from the NPF to a regional level.

The RSES has Climate Action as a key principle for the development of the Region. A Strategic Outcome identified in the plan is to *“transition to low carbon and climate resilient economy”*. Furthermore, under this, the RSES notes that:

“new energy systems and transmission grids will be necessary for a more distributed, renewables focused energy generation system, harnessing both the considerable on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy to the major sources of demand.”

The proposed development will support the introduction of renewable energy onto the national grid through construction of the substation and is therefore supported by the general overarching objective of the RSES, and by the following RSES objectives in particular:

RPO 4.17 – “To position the region to avail of the emerging global market in renewable energy by:

- *Stimulating the development and deployment of the most advantageous renewable energy systems*

- *Supporting research and innovation*
- *Encouraging skills development and transferability*
- *Raising awareness and public understanding of renewable energy and encourage market opportunities for the renewable energy industry to promote the development and growth of renewable energy businesses*
- *Encourage the development of the transmission and distribution grids to facilitate the development of renewable energy projects and the effective utilisation of the energy generated from renewable sources having regard to the future potential of the region over the lifetime of the Strategy and beyond.”*

RPO 4.18 – *“Support the development of secure, reliable and safe supplies of renewable energy, to maximise their value, maintain the inward investment, support indigenous industry and create jobs.”*

RPO 8.1 – *“The Assembly support the development of a safe, secure and reliable electricity network and the transition towards a low carbon economy centred on energy efficiency and the growth projects outlined and described in this strategy.”*

RPO 8.3 – *“The Assembly support the necessary integration of the transmission network requirements to allow linkages with renewable energy proposals at all levels to the electricity transmission grid in a sustainable and timely manner.”*

RPO 8.4 – *“That reinforcements and new electricity transmission infrastructure are put in place and their provision is supported, to ensure the energy needs of future population and economic expansion within designated growth areas and across the region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs. Ensure that development minimises impacts on designated areas.”*

3.4.3 Fulfilment of NPF and RSES Objectives for Development of Renewable Energy

The proposed development directly supports the operation of a permitted solar farm development that will contribute substantially to the objectives of the NPF and RSES.

Furthermore, the proposed substation will serve a permitted solar farm development with a maximum export capacity of 75MW of renewable energy. It is noted that while Part 1 of the Seventh Schedule does not include solar development as a class of development it does include wind energy development, for which it sets a threshold of 50MW, above which wind energy production could comprise of strategic infrastructure development. It provides as follows:

“an installation for the harnessing of wind power for energy production (a wind farm) with more than 25 turbines or having a total output greater than 50 megawatts”).

As the permitted solar farm which will be served by the proposed substation far exceeds the wind energy threshold, it is reasonable to conclude that it is strategic in nature in terms of the scale of renewable energy it will generate.

3.5 Conclusion on Appropriate Consent Route

Based on the foregoing we respectfully submit that the proposed development both technically falls within the legal provisions of section 182A(1) of the Act and also practically comprises electricity transmission development which is serving a strategic function. Accordingly, we conclude that an application to the Commission should be made under section 182A.

4.0 Key Planning Policy and Environmental Aspects of the Proposed Development

In consideration of the matters which are likely to influence a decision in respect of the proposed development we set out hereunder the following:

- Strategic National and Regional policy context;
- Key statutory planning provisions of relevance to the proposal; and
- Key environmental considerations (including screening for EIA and AA).

4.1 Strategic National and Regional Policy Context

4.1.1 Climate Action Plan 2025

The Climate Action Plan 2025 (CAP25) is the fourth annual update to Ireland's Climate Action Plan.

The purpose of the Climate Action Plan is to lay out a roadmap of actions which will ultimately lead us to meeting our national climate objective of pursuing and achieving, by no later than the end of the year 2050. The CAP sets out objectives for increasing renewable generation to supply 80% of demand by 2030 through the accelerated expansion of onshore wind and solar energy generation and targets for solar electricity production of 5GW by 2025 and 8GW by 2030.

The proposed substation and grid connection works which will support a permitted solar farm with an export capacity of 75MW will support meeting these objectives and targets.

4.1.2 National Planning Framework First Revision (NPFFR)

As set out in **section 4.4.1.1** above the proposed development is supported by and will contribute to the fulfilment of a number of strategic objectives of the NPFFR.

4.1.3 Northern and Western Regional Assembly (2020)

As set out in **section 4.4.1.2** above the proposed development is supported by and will contribute to the fulfilment of a number of strategic objectives of the RSES of the Northern and Western Regional Assembly.

4.2 Statutory Planning Context

4.2.1 Galway County Development Plan 2022-2028

The *Galway County Development Plan 2022-2028* is the statutory land use plan for the County.

As a rural site, there is no zoning objective attached to the application site and it comprises general open countryside.

The Development Plan contains a number of policies and objectives of relevance to the proposed development relating both to electricity transmission infrastructure directly and also to renewable energy development, which will be served and facilitated by the proposed substation and grid connection.

Chapter 7 of the Development Plan relates to Infrastructure, Utilities and Environmental Protection. The aim of the chapter as set out is

“To support and encourage investment and improvement in utilities, water, wastewater, electricity and gas infrastructure and support the development and enhancement of digital infrastructure.”

Section 7.7 of the Development Plan relates to electricity and notes that strong electricity infrastructure and transmission grid is essential for the county to attract investment, ensure energy supplies and reduce the dependency on fossil fuels. The following policy is of relevance:

EG 1: *Support and promote the sustainable improvement and expansion of the electricity transmission and distribution network that supply the County, while taking into consideration landscape, residential, amenity and environmental considerations*

EG 2: *Support the provision and extension of electricity and gas transmission networks within the county which are critical to the economic development of the County subject to environmental quality, landscape, wildlife, habitats or residential amenity.*

Chapter 14 of the Development Plan relates to Climate Change, Energy and Renewable Resource. A number of strategic aims are set out at section 14.2 of the Development Plan which include:

“To reduce County Galway’s dependency on imported fossil fuels and to provide alternative energy sources by harnessing the County’s potential for renewable energy sources while strengthening the grid transmission networks”.

The Plan lists a number of Climate Action and Energy Policy Objectives. Those of particular interest include:

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

RE 1: *To facilitate and support appropriate levels of renewable energy generation and ancillary facilities in the county to meet national, regional and county renewable energy targets, to facilitate a reduction in CO₂ emissions and the promotion of a low carbon economy.*

Policy EG 2 a): *“To support the development of the transmission grid network in order to sustainably accommodate both consistent and variable flows of renewable energy generated in County Galway.”*

Section 14.7.3 of the Development Plan recognises the requirement for a significant increase in the provision of a secure and adequate electricity infrastructure to ensure a reliable supply is available to households and businesses. The plan acknowledges that,

“a strong transmission grid is essential to attract and retain industrial investment, to ensure competitive energy supplies, to achieve balanced development, to reduce dependency on fossil fuels, and to achieve climate change targets.”

It is submitted that the proposed development of a substation and grid connection works at the application site, which will facilitate the export of 75MW of renewable energy to the Grid, is supported by these strategic policies and objectives outlined in the Galway County Development Plan 2022-2028. The substation and grid connection comprises essential facilitating infrastructure for the permitted solar farm development (Reg. Ref. 23/60875) that will enhance the electricity infrastructure in County Galway and will promote the transition from fossil fuels to renewable energy production. The development of the substation will further progress the achievement of climate change targets set out for County Galway.

4.2.2 Galway County Local Authority Renewable Energy Strategy

To facilitate the sustainable growth of renewable energies a Local Authority Renewable Energy Strategy (LARES) has been prepared for the county and forms Appendix 1 of the Development Plan. The LARES outlines the potential for a range of renewable resources, including solar. It describes and contains a series of

maps that indicate deployment zones where there is potential for future large scale wind and solar projects that will be technically viable, environmentally sustainable and respectful of social and community amenity.

The lands of the permitted solar development at Creggs, are designated as ‘*More Likely Viability*’ and ‘*Acceptable in Principle*’. In line with these designations the solar farm under Reg. Ref. 23/60875 was permitted by GCC.

The site of the proposed substation and the route of the proposed grid connection are on lands designated ‘*More Likely Viability*’. This designation is described in the LARES as follows:

“Areas where Solar Energy development projects are more likely to be proposed by developers on account of superior viability. These are more likely to be favourably considered - subject to the results of more detailed assessment of policies and potential effects. Future additional energy supporting infrastructure is likely to be prioritized in large areas where this designation is dominant.”

It is submitted that the current proposed substation and grid connection development is an essential item of infrastructure to facilitate the solar farm development, and that the designations set out in LARES extend to the development of the solar panels themselves and also to the supporting infrastructure such as the proposed development. As noted above, the LARES specifically identified areas designated as ‘*More Likely Viability*’, as likely to be prioritised for ‘energy supporting infrastructure’.

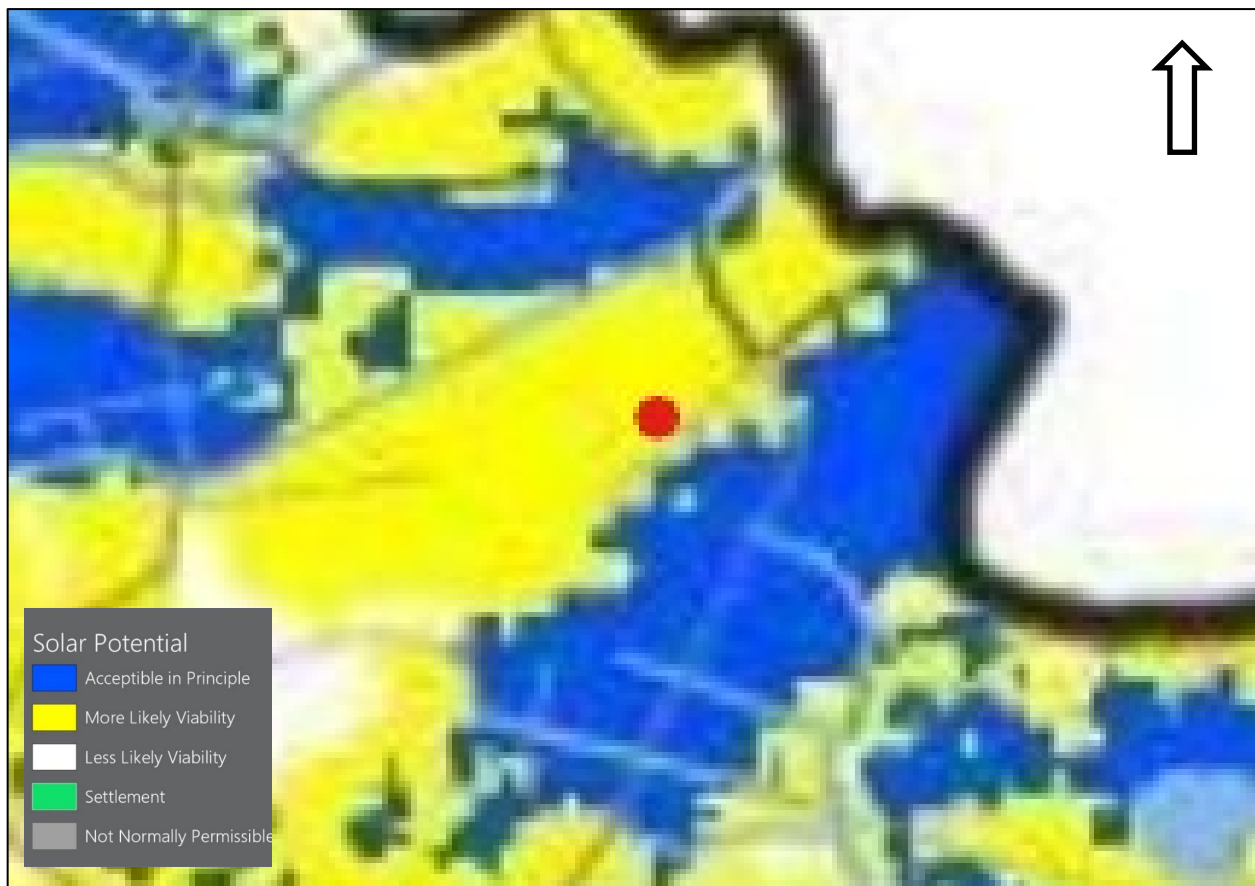


Figure 4-1 Approximate Location of Proposed Substation

Source: Map 16: Solar Potential, Appendix 1, Galway County Development Plan.

On the basis of the foregoing, it is submitted that the subject site is a suitable location for a 110kV substation having regard to the LARES mapping.

4.2.3 Galway County Action Plan 2024 - 2029

Each Local Authority in the country is statutorily required to lead in Climate Action at a county level. This leadership role is plan-led through Local Authority Climate Action Plans (hereafter referred to as LACAPs). These LACAPs set out a clear pathway towards reducing greenhouse gas emissions at the local level through the implementation of mitigation measures and reducing the risk to communities from climate change through adaptation measures.

The Galway County LACAP 2024 - 2029 sets out climate actions in a number of areas, including energy and built environment. The strategic goal in this area is to, *“transform to low-carbon, resilient and sustainable energy and buildings, enhancing the well-being of our community.”* In support of this overarching goal are the following objectives and actions:

“Objective EB1 Support the development of renewable energy sources, such as offshore wind only, solar, tidal, and biomass in suitable locations

Action EB 1.1 Support renewable energy research and development at the commercial and community scale whilst advocating and exerting influence to ensure such projects promote climate action co-benefits and do not contravene relevant environmental protection requirements.”

The proposed 110kV substation and grid connection infrastructure and the permitted solar farm which they will serve, are directly supported by this objective and action.

4.3 Environmental Considerations

This section considers the environmental context of the site to identify areas of potential environmental impact that may influence the future decision of ACP, and accordingly to inform what specialist reporting will likely be necessary for the purposes of an application for approval. This section also considers the need for appropriate assessment (AA).

4.3.1 Screening for Environmental Impact Assessment

Parts 1 and 2 of Schedule 5 of the Planning and Development Regulations, 2001, as amended set out classes of development that are subject to EIA. The substation element of the development does not fall within any of these classes of EIA development. The overhead loop in loop out part of the development however would comprise sub-threshold development under Class 3(b) of Part 2 of Schedule 5. If the loop in loop out were an underground connection, it would not fall within a class of EIA development. Because the overhead line option could comprise subthreshold development a sub-threshold EIA screening has been undertaken.

A *Report to Inform EIA Screening* by RPS has been prepared and forms part of this pre-application submission. It considers the potential environmental effects of the proposed development in accordance with the criteria set out within Schedule 7 of the Planning and Development Regulations 2001 (as amended).

The *Report to Inform EIA Screening* concludes that having regard to the nature and scale of the development proposed, the specific characteristics of the site and surrounding area, along with various embedded mitigation, the development is not likely to result in significant effects on the environment. Likely and potential environmental effects that are identified in the report, are considered to be of minor or moderate magnitude with many of temporary duration only. Accordingly, the *Report to Inform EIA Screening* concludes that the proposed development does not need to be subject to EIA and no EIAR is required. Please see the accompanying *Report to Inform EIA Screening* for further detail.

4.3.2 Screening for Appropriate Assessment

The site of the proposed development is not located within the boundary of any designated / protected sites of international, national or local nature conservation importance.

The closest designated Natura 2000 sites are the River Suck Callows SPA approx. 3.4km to the east and southeast and the Aughrim (Aghrane) Bog SAC approx. 3.4 km to the south. There are a number of other Bog and Turlough SACs within 15km of the subject site.

The qualifying interests of the River Suck Callows SPA are Whooper Swan, Golden Plover, Lapwing, Greenland White-fronted Goose, Wigeon and Wetland and Waterbirds. During a survey undertaken in 2022 the application site was recorded to support a range of relatively common and widespread bird species. It did not include any of the QI of the River Suck Callows SPA and no breeding waders. The density of grazing animals on the site in addition to the general composition of the habitats and the presence of woodland and mature trees in the vicinity was considered likely to significantly restrict its suitability for breeding waders / waterbirds. It is also noted that the application site is not hydrologically connected to the SPA, such that it does not have potential for indirect adverse impacts by reason of sedimentation or pollution. For these reasons, the proposed substation and associated infrastructure therefore is considered unlikely to have potential for impact on the River Suck Callows SPA.

The qualifying interest of the Aughrim Bog (Aghrane) Bog SAC is degraded raised bogs still capable of natural regeneration, with a conservation objective seeking to restore the favourable conservation condition of the bog. It is noted that this habitat and the achievement of the conservation objective is reliant on hydrological and hydrogeological factors amongst others. There are no watercourses on or close to the proposed application. It is not hydrologically connected to the Aughrim Bog (Aghrane) Bog SAC. The application site is also not hydrogeologically connected to the SAC as they are sited on different groundwater catchments. The proposed substation is on a locally important aquifer. The SAC is on a separate regionally important aquifer to the south. The proposed substation and associated infrastructure, therefore, is considered unlikely have potential for impact on the Aughrim Bog (Aghrane) Bog SAC.

Due to the separation of the application site from other Natura 2000 sites, the lack of hydrological and hydrogeological connection and the limited extent of excavation work required for the proposed development no potential for likely impact on any other Natura 2000 sites is identified.

Based on the foregoing it is possible that an NIS may not be required for the proposed application. However, a more detailed Appropriate Assessment screening exercise will be undertaken and if required an NIS will be prepared to accompany the planning application outlining any necessary mitigation measures.

4.3.3 Ecology

The construction of the substation and associated grid connection infrastructure will require the clearance of vegetation from the existing agricultural fields. The construction of the substation may also impact on an existing hedgerow. The ecological value of the site is limited to local value. The habitats and species affected are not species rich and are widespread in the area. There will be no loss of sensitive ecological habitat as a result of this development. The expected impact on flora on the site due to construction is not considered significant.

The construction of the development does have the potential to cause a disturbance to fauna at the site and in the surrounding area, as a result of an increase of human activity on the site and resulting increase in noise on the site. It is anticipated that mobile species, such as mammals and birds, will temporarily leave the vicinity of the site during construction works. From surveys undertaken in 2022 however, no protected mammals were identified as present on the site. No evidence of badger setts and no bat roost potential was identified at the site. Even in the event that protected species were identified on the site it would be possible to put in place mitigation to appropriately amend the project design or relocate the mammals. Overall, the impact on fauna at the site during construction is considered to be slight only and of a temporary nature.

The presence and ongoing operation of the substation and associated grid connection infrastructure has little potential for further impact on biodiversity during the operational phase.

An *Ecological Impact Assessment* based on recent site surveys will be prepared and submitted as part of the application documentation.

4.3.4 Traffic

Construction of the permitted solar farm and proposed development is anticipated to take place in tandem over a period of 4 – 6 months and during that time additional traffic movements are expected. It is currently estimated that the construction phase of the substation combined with the permitted solar farm will generate approximately 1,020 no. additional HGV trips in total over the duration of construction. Based on a short construction period of approx. 4 months (16 weeks), this would give rise to an average daily increase in HGV trips per day of 13 and the maximum no. of additional trips per day is estimated to be 16.

An average workforce of 80 - 100 persons is currently anticipated. This may increase to over 100 persons during peak periods. Workers will generally travel to the site via minibus from local accommodation. Average minibus occupancy of 8 persons is expected to generate no more than 12 no. two way trips per average working day, which would rise marginally during peak construction periods.

The combined HGV (13) and LGV (24) average daily increase would be 37 no trips per day. This level of traffic can be accommodated on the local road network without giving rise to significant adverse impacts in terms of traffic delays or queuing etc.

A Construction Traffic Management Plan will be prepared and submitted as part of the application documentation to identify these traffic impacts and to set out measures for the control and management of traffic flows and site access.

4.3.5 Archaeology

There is one recorded archaeological site (as recorded by the Archaeological Survey of Ireland (ASI)) located within the boundary of the overall solar farm site, namely a ringfort (GA020-005----). This ringfort is located circa 125 meters from the proposed substation site and will not be physically impacted by the proposed development. In addition, the setting of these assets does not extend into the site, and as such, the proposed development will not result in any impacts to the settings of these assets.

An *Archaeological Assessment Report* will be prepared and submitted as part of the application documentation.

4.3.6 Flood Risk Assessment

The subject site is located within Flood Zone C and is considered to be at low risk of flooding. A *Flood Risk Assessment* (FRA) will be prepared and submitted as part of the application documentation.

4.3.7 Landscape and Visual Impact

The local landscape of the application site has a low sensitivity rating according to the landscape character assessment set out in the Galway County Development Plan 2022 – 2028. Low Sensitivity Areas are robust landscapes, tolerant to change, such as the county's main urban and farming areas. The landscape is dominated by large areas of low-lying farmland between large bogs and wetlands and is relatively sparsely populated and crossed by few roads. Given the topography and elevation of the site and surrounds, the potential extent of visibility of the site will be limited. Furthermore, there are few potentially sensitive receptors located nearby and finally the existing landscape is of low sensitivity such that it has potential to accommodate some change. Overall, the impact on landscape is considered to be slight to moderate negative at a local level, with effects arising limited in both scale and extent.

A Landscape and Visual Assessment will be prepared and submitted as part of the application documentation.

5.0 Proposed Content of Section 182A Application

It is considered from the information set out above that the proposed substation and loop in infrastructure connecting the overall solar farm development to the national grid falls under the provisions of Section 182A of the Act.

It is proposed that an application shall be made to ACP for approval following this pre-application consultation and confirmation by ACP that section 182A is the appropriate consent route. We set out hereunder the proposed documentation to be provided with the proposed section 182A application.

5.1 Application Drawings

It is proposed that drawings will be submitted for the proposed development in accordance with the standard requirements of the Planning and Development Regulations for a section 34 planning application. In addition, a contextual site layout plan will also be included which indicates the proposed development in combination with the adjacent solar farm development which has already been permitted by GCC under Reg. Ref. 23/60875.

5.2 Environmental and Engineering Reporting

It is submitted that EIA is not necessary for the development. The proposal does not fall within the provisions of mandatory EIA and having considered the key areas of potential impact no likely significant impacts on the environment are identified so as to warrant a sub-threshold development EIA. Accordingly, it is suggested that an EIAR will not be submitted in this instance.

Although the development is not considered to require EIA, the proposed development will be subject of robust assessment, and a number of individual specialist reports will be prepared to assess the potential impacts of the proposed development in its own right on various aspects of the environment. Each of the specialist reports will also consider the potential impacts of the proposed development in combination with impacts of the solar farm development on the environment.

The suggested list of environmental and engineering reports to be provided are as follows:-

- *Report to Inform Environmental Impact Assessment Screening* prepared by RPS;
- *Engineering Reports* by Elgin Energy;
- *Ecological Impact Assessment* by RPS
- *Appropriate Assessment Screening Report* and *Natura Impact Statement* if identified as necessary, prepared by RPS;
- *Flood Risk Assessment* prepared by JBA Consulting Ireland;
- *Construction Environmental Management Plan* prepared by RPS ;
- *Construction Traffic Management Plan* prepared by RPS;
- *Traffic and Transport Assessment* prepared by RPS;
- *Archaeological Impact Assessment* prepared by John Cronin and Associates; and
- *Landscape and Visual Impact Assessment* prepared by Macroworks.

5.3 Planning Report

A planning report will be submitted which will set out the rationale for the proposed development and indeed for the development which it will serve. It will identify key national and regional policy provision of relevance to the proposal, set out relevant statutory planning context and undertake a planning assessment of the development with reference to relevant policies and objectives of the plan. The findings of the various environmental reports will be cross referenced as appropriate.

5.4 Procedural

The application will be accompanied by the relevant application fee, application form, copies of public notice(s) and list of prescribed bodies notified as relevant and as required by ACP.

6.0 Conclusion

We request ACP to consider and confirm as appropriate that the correct approval route for the proposed substation and loop in infrastructure in this instance is Section 182A of the Planning and Development Act for the following reasons:

- Development is for the purposes of ‘electricity transmission’ and falls with the legal interpretation of section 182A, (1) of the Act;
- Development will physically form an integrated node on the transmission network; and
- Development will be inserted on a regionally significant part of the transmission network between Lanesboro and Cloon.

The proposed development is of ‘strategic importance’ and will fulfil objectives of the NPF and Regional Policy Objectives for the Northern and Western Region with reference to the scale of renewable energy production it will serve. Accordingly, it complies with the spirit and purpose of the Planning and Development (Strategic Infrastructure) Act, 2000.

In conclusion the opinion and / or advice of ACP is sought in respect of the following matters in particular:-

- Confirmation that the proposed development comprises of strategic electricity transmission development and that the appropriate consent route for same is section 182A of the Planning and Development Act;
- Opinion of the key matters likely to impact on the decision of ACP;
- Opinion on whether EIA is required in respect of the proposed development based upon the EIA Screening document prepared by Tetra Tech;
- In the event that formal EIA is not required, confirmation of the scope of environmental reporting required;
- Opinion on whether environmental report should present combined impacts of the proposed development with the solar farm subject of the application to GCC;
- Opinion on what prescribed bodies should be notified of application;
- Need for site notice and any other planning application requirements;