

**Strategic Infrastructure Development Proposal – Direct Application
to An Bord Pleanála under Section 182A(1) of the Planning and
Development Act 2000 (as amended)**

**110kV Electricity substation, approximately 7.5km of underground
electricity line and all associated works on lands at Moyvannan,
Feamore, Lisbaun, Carrownolan, Carrowncloghan, Carrowkeeney,
Ardmullan, Curraghboy, Gortnasythe, Derryglad, Eskerbaun &
Brideswell, Co. Roscommon.**

An Bord Pléanala ref. no. ABP-321238-24

**Roscommon County Council submission to
An Bord Pleanála**



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1.0 Planning Application Overview

Development Proposal

The proposed development is a 110kV electricity substation and approximately 7.5km of Underground Grid Connection and all associated works. The development is proposed in the townlands of Moyvannan, Feamore, Lisbaun, Carrownolan, Carrowncloghan, Carrowkeeney, Ardmullan, Curraghboy, Gortnasythe, Derryglad, Eskerbaun and Brideswell in County Roscommon

As per the formal development description, the various components of the development include:

- (i) A 110 kilovolt (kV) 'loop-in/loop-out' Air-Insulated Switchgear electricity substation, including a single-storey control building (with a Gross Floor Area of 450 square metres) and all associated electrical equipment and services within a 2.6 metre high fenced compound (with a total footprint of approximately 8,500 square metres);
- (ii) Replacement of 1 no. existing wooden pole-set with 2 no. lattice-type interface masts, each of which will be between 15 and 18 metres in height, to facilitate connection of the 110kV underground electricity lines to the existing Athlone-Lanesborough 110kV overhead electricity transmission line;
- (iii) Approximately 270 metres of 110kV underground electricity line between the electricity substation and the interface masts;
- (iv) Approximately 630 metres of access tracks with associated upgrade works to an existing agricultural entrance from the L7551 local road;
- (v) Approximately 7.5 kilometres of 110kV underground electricity line between the electricity substation and the junction of the L7636 local road and R363 regional road where the electricity line will connect to electricity cables permitted as part of the Seven Hills Wind Farm (An Bord Pleanála Reference ABP-313750-22). The electricity line will be placed within private lands and within the carriageway of the L7551, L7556, L2018, L7731, R362, L2023, and L7636; and
- (vi) All associated and ancillary site development, excavation, construction, landscaping and reinstatement works and the provision of site drainage infrastructure and surface water protection measures.

A 10 year planning permission is being sought and the case set out for this refers to it being appropriate for a development of the nature proposed in order to ensure that all required supplementary statutory consents and licenses can be put in place.

The application is accompanied by an Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS).

Applicant: Energia Renewables ROI Limited.

2.0 Relevant Statutory Particulars relates to this Strategic Infrastructure Development – Planning and Development Act 2000 (as amended)

2.1 Determination of the proposed development constituting Strategic Infrastructure Development (SID)

Section 182A of the Planning and Development Act 2000, as amended, applies to the subject proposal and the following sets out an overview of the primary legislative considerations:

- (1) Section 182A requires that 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.
- (2) The undertaker shall prepare, or cause to be prepared, an Environmental Impact Assessment Report or Natura Impact Statement or both that report and that statement, as the case may be, in respect of the development.
- (3) The proposed development shall not be carried out unless the Board has approved it with or without modifications.
- (4) Before an undertaker makes an application under subsection (1) for approval, it shall —

Publish in one or more newspapers circulating in the area or areas in which it is proposed to carry out the development a notice indicating:

- The nature and location of the proposed development;
- Intent to seek the approval of the Board for the proposed development;
- Reference to environmental impact assessment report or Natura Impact Statement or both, as the case may be, prepared in respect of the proposed development;
- Availability of application and associated details for inspection and/or purchase;
- Invitation to make submissions and observations to the Board;
- Implications of the proposed development for proper planning and sustainable development in the area or areas concerned;
- Likely effects on the environment or adverse effects on the integrity of a European site, as the case may be, of the proposed development;
- Specify the types of decision the Board may make, under section 182B, in relation to the Application;
- Details of the right of a person may question the validity of a decision of the Board by way of an application for judicial review, under Order 84 of the Rules of the Superior Courts (S.I. No. 15 of 1986).

The foregoing represents a general overview of the planning legislative procedure as set out in the Act.

3.0 The role of Roscommon County Council in the Strategic Infrastructure Development planning application process

Further to the identification of Roscommon County Council as a statutory consultee, and in accordance with the requirements of Section 182(b) of the Planning and Development Act 2000 (as amended), notice and copies of the planning application and associated supporting Reports were received from the applicants on November 11th 2024, in advance of the commencement of the public consultation period on the application on November 18th 2024 (and running until January 15th 2025).

In preparing this submission in its capacity as a consultee on this Strategic Infrastructure Development application, Roscommon County Council notes and acknowledges the content of the application submission, including detailed drawings of the proposed development, and the following supporting documents:

- Planning Application Notification Letter issued to An Bord Pleanála;
- Planning Application Notification Letter issued to each Prescribed Body, including Roscommon County Council;
- Completed Planning Application Form;
- Site Notice;
- Newspaper Notice;
- EIA Portal Confirmation Notice;
- Planning Application Drawings;
- Environmental Impact Assessment Report (EIAR), including Volume I – Assessment of Proposed Development; Volume II – Technical Annexes in support of Volume I; and Non-Technical Summary; and
- Natura Impact Statement (NIS).

4.0 Location

The electricity substation is proposed to be located in the townland of Moyvannon, Co. Roscommon, which is approximately 8 kilometres to the north west of Athlone. The associated underground line which would connect the permitted Seven Hills windfarm development to the substation is proposed to extend approximately 7.5 kilometres, in a general westerly / south westerly direction through the townlands of Moyvannon, Feamore, Lisbaun, Carrownolan, Carrowncloghan, Carrowkeeney, Ardmullan, Curraghboy, Gortnasythe, Derryglad, Eskerbaun, and Brideswell.

The entire site area extends to approximately 20 hectares. As set out in the public notice, the underground line would in part be through private lands, with the remainder being within the carriageway of public roads, namely the L7551, L7556, L2018, L7731, R362, L2023, and L7636.

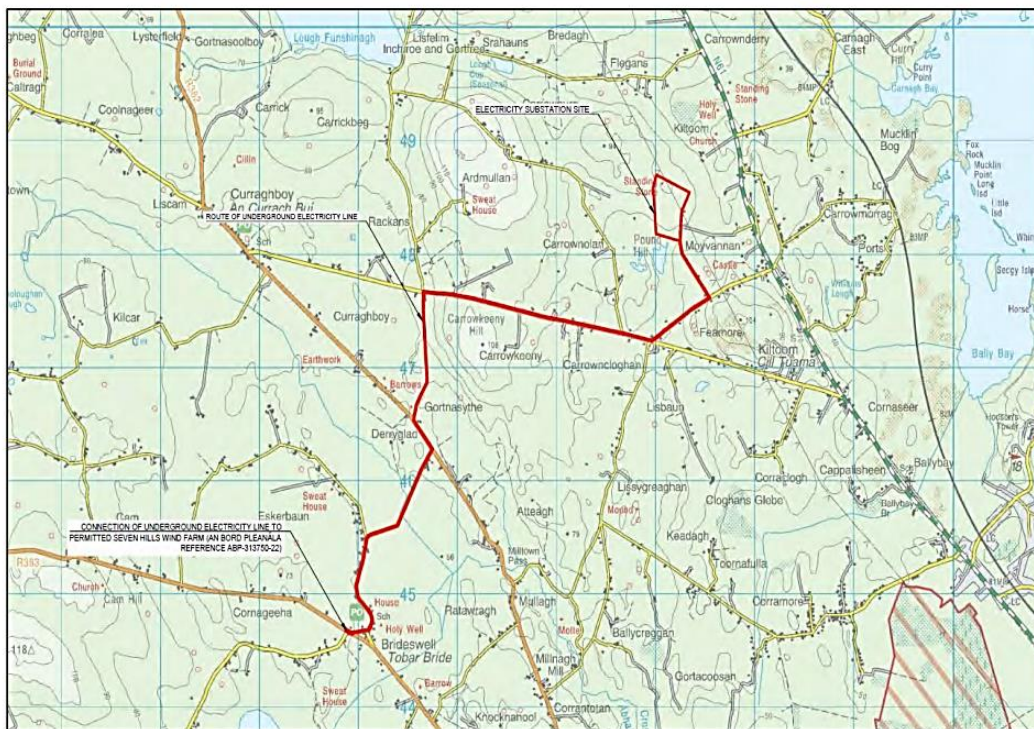


Fig. 1: Proposed development site (identified in red)

Source: Environmental Impact Assessment Report - Non-Technical Summary (Gaeltech Energy Services)

The proposed location of the substation and the associated route of the underground line is through a predominantly rural area, characterised by agricultural landholdings and rural dwellings. None of the lands through which the subject site passes are assigned any specific land use zoning in the *Roscommon County Development Plan 2022-2028*. Brideswell, at the south western end of the proposed underground cable route, is the largest settlement in the immediate vicinity. The proposed site is located within the 'Lough Funshinagh, Stone Wall Grasslands and Esker Ridges' landscape character area, as identified in the *County Roscommon Landscape Character Assessment*, which forms part of the *Roscommon County Development Plan 2022- 2028*. This landscape character area is classified as being of 'Moderate Value.'

5.0 Development Justification

5.1 Purpose of proposed development

The purpose of the proposed development is to facilitate the connection of the permitted Seven Hills Windfarm¹ to the national electricity network. The permission for that development included a grid connection of approximately 11km to connect to the national grid network at the 110kV substation in Monksland, Co. Roscommon. However, as detailed in the current application documentation, *“due to subsequent factors entirely beyond the applicant’s control, it is now assessed that a connection to the Athlone substation is no longer optimal.”* The current proposal is therefore being pursued as an alternative and in the event of the granting of planning permission for the development, it is the applicants intention to then *“seek to alter the Seven Hills Windfarm planning permission via a future request under Section 146B of the Act to omit the relevant part of the underground electricity table, which will no longer be required.”*

The existing Athlone to Lanesborough overhead line that the development is proposed to connect to passes through the site of the proposed substation in Moyvannon, as it runs in a general south / south east to north / north west direction.

Roscommon County Council, in its submission to An Bord Pléanala on the above detailed Seven Hills windfarm application, confirmed its view that the wind farm development and associated grid connection was acceptable in principle and considered to accord with relevant national, regional and local planning policy. The Seven Hills windfarm was recognised as a potential renewable energy project of significant scale in County Roscommon, which would provide an opportunity to reduce dependency on non-renewable resources and would assist in achieving a greater degree of energy security than is presently the case. This remains the position of Roscommon County Council in respect of the permitted windfarm, and in conjunction with this, it is recognised that the current proposal has been put forward to overcome technical impediments to advancing a connection to the national grid via the original permitted grid connection route.

6.0 Relevant Planning History

Vicinity of proposed substation site at Moyvannon

PD/24/60559 : Planning permission is currently being sought by Eirgrid Plc for “for works to uprate approximately 35.7km of the overall 35.82km of the existing Athlone to Lanesboro 110 kV overhead line (OHL) circuit located within the administrative boundary within County Roscommon. The proposed development will consist of: • Replacement (“restringing”) and uprating of the conductor along the existing Athlone-Lanesboro 110 kV OHL circuit; • Provision of fibre communication connection on the uprated circuit; • Replacement of 155No. Intermediate Wooden Polesets (IMPs), with similar structures, including poleset stays at 32No. IMPs. The change in structures will result in standardised heights from 16m to 23m along the circuit, the majority of height increases will be between 0.1m and 2.0m (at 125 No. IMPs), with the remainder between 2.1m and 3.7m, and a 4.0m height increase at only one IMP. 3no. IMP replacements will not result in a height change; • Replacement of 25No. Intermediate Wooden Poleset crossarms; • Replacement of 1No. steel angle mast, the replacement structure will result in a height increase of 0.5m; • Foundation strengthening of 9No. steel angle masts, and 1No. end mast; • Bar member replacements to

¹ Permitted under An Bord Pléanala planning ref. no. ABP-313750-22.

12No. steel angle masts and 1No. end mast; and, •All associated development including insulator/hardware replacement (suspension clamps and vibration dampers), replacement of signage, painting of angle masts, replacement/installation of anticlimbing guards, access tracks, vegetation clearance, temporary construction compounds and all other works necessary to facilitate the development. A Natura Impact Statement (NIS) has been prepared to accompany the planning application.”

The planning application in its entirety through County Roscommon extends from the Athlone 110kV substation in the townland of Monksland, to Knockcroghery, Moher, Gardentown, Toberreeoge, Toberdan, Feamore, Corraclogh, Kiltewan, Kellybrook, Srah, Corboley, Curry, Cloontogher, Derrycarbry, Carrigeens, Cloonaddra, Clonsellan, Lisfelim, Coolshaghtena, Cornamart, Meehaun, Bredagh, Cornaseer,, Barry Beg, Barry More, Coolaphubble, Lisnahoon, Corramore, Kellybrook, Cappalisheen, Anrittabeg, Cartron, Flegans, Ballinlig, Lisnarriagh, Ballyclare, Clooncraff, Ballyleague, Carrick, Clooneigh, Carrigan More, Derrinturk, Moyvannan, Killiaghan and Gort.

The above planning application was received on November 27th 2024 and the assessment of the proposal is on-going at the present time.

7.0 Planning Policy

Given that the purpose of the proposed development is to ultimately connect a permitted large scale wind energy development to the national grid, it is relevant to consider the current proposal in the context of both renewable energy and infrastructure policies at national, regional and local level.

7.1 National Policy Context - National Planning Framework

This Plan sets out a strategic national planning framework for the entire country. It recognises the need to move toward a low carbon and climate resilient society, and it emphasises that rural areas have a strong role to play in securing a sustainable renewable energy supply.

7.2 Regional Policy Context

Northern and Western Regional Assembly's *Regional Spatial and Economic Strategy 2020 – 2032 (RSES)*

The key statutory purpose of the *Regional Spatial and Economic Strategy* (RSES) is to support the implementation of the National Planning Framework (NPF). The RSES for the Northern and Western Regional Assembly (NWRA) provides a twelve-year strategy for the sustainable growth of the region.

Pertinent policy objectives relating to renewable energy include:

- 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.

Chapter 8 of the RSES deals with the infrastructure of the region and Section 8.2 highlights that *“ensuring the necessary investment in the transmission and distribution networks to meet the needs of a growing economy and the transition from fossil fuels to renewables is imperative but also to incentivise local innovation and micro-generation.”*

Section 8.3 further outlines that *“developing the grid will enable the transmission system to safely accommodate more diverse power flows from surplus regional generation and also to facilitate future growth in electricity demand. These developments will strengthen the network for all electricity users, and in doing so will improve the security and quality of supply. This is particularly important if the region is to attract high technology industries that depend on a reliable, high quality, electricity supply.”*

- RPO 8.3 – The Assembly supports the necessary integration of the transmission network requirements to allow linkages with renewable energy proposals at all levels to the electricity transmission grid in a sustainable and timely manner.
- RPO 8.4 - That reinforcements and new electricity transmission infrastructure are put in place and their provision is supported, to ensure the energy needs of future population and economic expansion within designated growth areas and across the Region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs. Ensure that development minimises impacts on designated areas.
- RPO 8.1 – aims to: 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 8.2 – aims to: *Support the reinforcement and strengthening of the electricity transmission network with particular reference to the regionally important projects.*

7.3 Local Policy Context

Roscommon County Development Plan 2022-2028

The *Roscommon County Development Plan (RCDP) 2022-2028* supports the role of developing its renewable energy base and facilitating the requisite enabling infrastructure in order to reduce the county’s overall carbon footprint and increase energy efficiencies across a range of sectors. Broad policy support for renewable energy and its associated benefits is clearly expressed in the first of fourteen strategic aims detailed for the future development of County Roscommon, in which Roscommon County Council’s aspiration is set out to *“Achieve a transition to a competitive, greener, low carbon, climate resilient and environmentally sustainable county, facilitated through reducing the need to travel, by integrating land use and sustainable modes of transport, by reducing the use of non-renewable resources and by promoting and*

facilitating renewal energy initiatives on a domestic and commercial scale.”

The need to tackle climate change, and the contribution of renewable energy to that cause is a key consideration in the County Development Plan. In the context of Rural Development and Natural Resources, as discussed in Volume I, Chapter 5, Section 5.7 specifically addresses renewable energy. The potential for rural areas to accommodate wind, hydro and solar energy projects is recognised and a clear and balanced commitment is expressed that *“the Council will support renewable energy projects in rural areas, subject to ensuring the protection of landscape sensitivities, residential amenity, views or prospects, public rights of way, wildlife, habitats, special areas of conservation, protected structures, bird migration paths etc.”*

Chapter 8 of the Plan expands on this, with the focus of the chapter being ‘Climate Action, Energy and Environment.’

Policy objectives CAEE 8.1 expresses broad support for European and national objectives for climate action, adaptation and mitigation, while CAEE 8.2 supports the National Climate Change Strategy *“by actively seeking to implement the policy objectives throughout this Plan which contribute to positive climate actions, including those related to renewable energy, sustainable transport, air quality, flooding and the promotion of urban and rural green initiatives.”*

Policy Objective CAEE 8.9 gives effect to this commitment, as it commits to *“Work in collaboration with EirGrid and other service providers and statutory bodies to facilitate a modern electricity network within the county....., in line with recognised best practice. The Council will require comprehensive studies to be undertaken for all technical and environmental considerations, to inform the assessment of proposed transmission routes”*.

The following policy objectives are of particular relevance in the context of climate action and energy, including policy objectives specifically addressing wind energy:

- **CAEE 8.3:** Support developments and actions that assist in achieving the national targets for energy from renewable energy, from renewable resources and reducing greenhouse gas emissions associated with energy production.
- **CAEE 8.4:** Encourage and facilitate the various forms of renewable energy development detailed in the *Renewable Energy Strategy* that accompanies this Plan (as well as any other new forms of renewable energy which may be developed during the lifetime of this Plan), subject to satisfying the principles of proper planning and sustainable development.
- **CAEE 8.5:** Facilitate wind energy developments primarily in areas designated in the *Renewable Energy Strategy* as “Most Favoured” and secondarily in areas designated as “Less Favoured” in the *Renewable Energy Strategy*, subject to normal planning criteria and having regard to the *Wind Energy Guidelines* (DECLG, 2006) and any update to the Guidelines that may issue during the lifetime of this Plan. This will include consideration of carbon benefit analysis, as appropriate.

¹⁴ *Making the Transition to a Low Carbon Society in the Western Region* – Western Development Commission (2020).

- **CAEE 8.7:** Ensure that proposals for renewable energy developments are considered in the context of relevant EU and national legislation, including in respect of environmental protection. No renewable energy developments will be considered in designated Natura 2000 sites or their surrounding buffer areas.
- **CAEE 8.8:** Ensure that renewable energy developments do not undermine the preservation and conservation of the natural and built environment and that an appropriate balance is achieved between renewable energy development and preservation of the natural environment.
- **CAEE 8.12:** Facilitate renewable energy proposals that bring about a direct socio-economic benefit to the local community.

The foregoing renewable energy related policy objectives are also reflected in the accompanying *Renewable Energy Strategy*.

In considering the current proposal for a substation and underground grid connection route to enable the connection of a permitted windfarm development to the national grid, policies relating to built and natural heritage are also of relevance.

As noted in Chapter 9 (Built Heritage) of the *Roscommon County Development Plan 2022-2028*, built heritage includes all manmade structures and features of the landscape of the county. As noted in the EIAR accompanying this SID application, there are no Protected Structures within the footprint of the subject site, albeit that there are 4 such structures noted as being within a 2km range of the proposed substation location. Similarly there are no Recorded Monuments or any additional statutorily protected archaeological features within the footprint of the proposed development (including both the electricity substation and the proposed underground line), although there are a number of recorded monuments within the wider vicinity of the site extent, with the closest being within 200 metres of the proposed substation site.

Section 9.7 of the County Development Plan focuses on ‘Archaeological Heritage’ and sets out the policy position in policy objective BH 9.13:

- **BH 9.13:** Secure the preservation (i.e. preservation in situ or, as a minimum, preservation by record) of all archaeological monuments included in the Record of Monuments and Places as established under Section 12 of the National Monuments (Amendment) Act, 1994, and of sites, features and objects of archaeological interest generally. In securing such preservation Roscommon County Council will have regard to the advice and recommendations of the National Monuments Section of the Department of Housing, Local Government and Heritage.

Chapter 10 of the Plan deals with ‘Natural Heritage’ and sets out the policy position in respect of biodiversity in general, as well as specific considerations in relation to European designated sites and Appropriate Assessment, geological heritage and landscape character. In respect of the latter topic, the suite of documents which form part of the County Development Plan includes a *Landscape Character Assessment*.

The following policy objectives, as detailed in Chapter 10 of the Plan are of relevance when considering the proposed development:

Biodiversity

- **NH 10.1:** Ensure the protection, conservation and enhancement of the biodiversity of the county.
- **NH 10.4:** Proposals where woodland, tree or hedgerow removal is proposed will be required to demonstrate a sufficient level of protection to Annex IV species, such as Bats and Otter, in accordance with the Habitats Directive.
- **NH 10.5:** Ecological Impact Assessment (EclA) will be required for proposed developments likely to significantly impact on natural habitats and/or species, and which are not subject to Environmental Impact Assessment.

Natura 2000 Sites and Appropriate Assessment

- **NH 10.7:** Implement Article 6(3) and where necessary Article 6(4) of the Habitats Directive and to ensure that Appropriate Assessment is carried out in relation to works, plans and projects likely to impact on European sites (SACs and SPAs), whether directly or indirectly or in combination with any other plan(s) or project(s). All assessments must be in compliance with the European Communities (Birds and Natural Habitats) Regulations 2011.
- **NH 10.8:** Ensure that no plans, programmes, etc. or projects are permitted that give rise to significant cumulative, direct, indirect or secondary impacts on the integrity of European Sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects, (either individually or in combination with other plans, programmes, etc. or projects).
- **NH 10.9:** Ensure that any plan or project that could have a significant adverse impact (either alone or in combination with other plans and projects) upon the conservation objectives of any Natura 2000 Site or would result in the deterioration of any habitat or any species reliant on that habitat will not be permitted unless in exceptional circumstances.

Geological Heritage

- **NH 10.11:** Preserve and protect sites of county geological importance from inappropriate development where they comprise designated sites or national heritage areas.

Woodlands, Trees and Hedgerows

- **NH 10.13:** Encourage the retention of hedgerows and other distinctive boundary treatments in rural areas and prevent loss and fragmentation, where practically possible. Where removal of a hedgerow, stone wall or other distinctive boundary treatment is unavoidable, mitigation by provision of the same type of boundary will be required.

Landscape Character

Landscape character includes landscape character areas and the landscape value assigned to each of those distinct areas, and also includes protected views and scenic route. Policy objective NH 10.25 is of relevance in respect of landscape character considerations:

- **NH 10.25:** Minimise visual impacts on areas categorised within the County *Roscommon Landscape Character Assessment* including “moderate value”, “high value”, “very high value” and with special emphasis on areas classified as “exceptional value” and where deemed necessary, require the use of Visual Impact Assessment where proposed development may have significant effect on such designated areas.

There are no scenic routes or scenic views in the vicinity of the proposed site.

In addition to policy objectives relating to specific topic areas, all development proposals are required to comply with relevant development management standards set out in Volume I, Chapter 12 of the County Development Plan. The following sets out a number of items of relevance in the context of the subject windfarm proposal.

Section 12.4 Development Contributions: This details the requirement, through condition in the event of the granting of planning permission, for the payment of development contributions in accordance with the Development Contribution Scheme for the county, which has been prepared in accordance with Section 48 of the Planning and Development Act 2000 (as amended). At the present time, the *Development Contribution Scheme 2014 (as amended 2020)* is in effect. As set out in Table 5 of the Scheme, wind farm developments warrant a development contribution of €6,000 per MW of capacity.

Whilst the application of development contributions was relevant to the wind farm development that the current proposal is associated with, the nature of the subject proposal is considered to largely constitute enabling infrastructure and the currently applicable Development Contribution Scheme would not give rise to the proposal being liable for payment of a standard development contribution.²

Section 12.5 Overarching Planning Principles: In order to assess the potential impacts of a proposed development, the need for specialist assessments is highlighted in this section, including where warranted a Natura Impact Assessment to inform the Appropriate Assessment process, Environmental Impact Assessment Report, Archaeological Assessment, Landscape Appraisal and Visual Impact Assessment and Ecological Assessment. In this regard, it is noted that documentation submitted as part of the current SID application includes an Environmental Impact Assessment Report and a Natura Impact Statement.

² Refer separately to commentary in Section 10 of this report in respect of a Special Contribution for annual road maintenance purposes.

8.0 Environmental Considerations including Environmental Impact Assessment and Appropriate Assessment

<u>Accompanied by Environmental Impact Assessment Report (EIAR):</u>	Yes
<u>Within designated site(s):</u>	No
<u>Accompanied by a Natura Impact Statement (NIS):</u>	Yes

Environmental Impact Assessment Report (EIAR) – As set out in the EIAR, the proposed development will form part of the Seven Hills windfarm development, which itself was the subject of an EIAR. Whilst recognising that it remains a matter for the Board in the assessment of the current proposal, to assess the adequacy of the submitted EIAR, Roscommon County Council is generally satisfied that the EIAR demonstrates that the likelihood of significant environmental effects from the proposed development, either alone or in combination with other existing or proposed developments, including the associated permitted windfarm development, have been considered and satisfactory mitigation has been proposed where relevant.

Appropriate Assessment – Roscommon County Council note the submission of a Natura Impact Statement (NIS) accompanying the current SID application. As with the EIAR, the Local Authority recognises the role of the Board, as the Competent Authority, to undertake a Stage 2 Appropriate Assessment, informed by the NIS. Notwithstanding that the subject site is not within a European designated site, the Council agree with the position established by the applicants and the professionals responsible for the preparation of the NIS, that *“it cannot be excluded based on objective evidence and in view of best scientific knowledge, that there will not be any likely significant effects from the construction or operation activities from the project alone, and in combination with other plans or projects,”* on a number of identified Natura 2000 sites. The Council notes in particular potential hydrological connectivity. Accordingly, it is considered that the submission of a Natura Impact Statement with this application was necessary, in order to ultimately assist the Competent Authority in undertaking Appropriate Assessment.

It is considered that Section 5 of the submitted Natura Impact Statement comprehensively examines the risks that the project presents that may undermine the conservation objectives of identified European designated sites, that the proposed development has been examined in combination with other plans or projects, and that appropriate mitigation measures have been identified³ to address the risks.

³ Detailed as ‘Step 4’ in the submitted NIS.

9.0 Consultations

9.1 Roscommon County Council Roads Department

The development proposal has been considered by the Roads Department of Roscommon County Council. The full response is contained in Appendix 1 of this report. Concern has been expressed in the report about the long term effect that the proposed works may have on the local road network included in the identified route, and it is considered that significant constraints may be placed on the Local Authority with respect to all future works along the proposed route. Several detailed recommendations have been made by the Roads Department in order to ensure roads resilience of the proposed project over the entire route.

A key recommendation from the Roads Department is that the proposed grid connection cabling and joint bays be located in the verge, at least 1.2 metres from the road edge. This is a requirement which was highlighted to the applicants / their representatives during direct engagement with personnel from the Roads Department in 2024, but has not been reflected in the current proposal. In addition it is noted with concern that the identified planning unit boundary is limited to the extent that the potential to adhere at this stage to this requirement is questionable. In the event that cabling is undertaken within the public road carriageway, full lane reinstatement would be required.

A number of practical recommendations and requirements for engagement with Roscommon County Council as Roads Authority are also outlined, in the event of the granting of permission for the proposed development.

10.0 Miscellaneous Considerations

Special Amenity Area Order – There are no Special Amenity Area Orders in County Roscommon.

Built Heritage Considerations – There are no Protected Structures or Recorded Monuments within the extent of the identified site of this SID proposal. Protected structures and recorded monuments in the wider vicinity of the project have been appropriately identified in the accompanying EIAR.

There are no Architectural Conservation Areas designated within the vicinity of the proposed site.

Landscape Considerations – The extent of the subject site is predominantly in the ‘Lough Funshinagh, Stone Wall Grasslands and Esker Ridges’ landscape character area, as identified in the *County Roscommon Landscape Character Assessment*, which forms part of the *Roscommon County Development Plan 2022-2028*. This landscape character area is classified as being of ‘Moderate Value.’ As per the details contained in the *Landscape Character Assessment*, the landform rolls from north to south and is primarily dry grassland farmland, with a distinctive esker area to the south. The LCA notes that the impact of built development, particularly one off houses, is significant in some instances and undermines the visual quality of the landscape.

Having regard to the nature of the subject proposal and the limited built elements above ground, it is considered that the landscape has the capacity to absorb the development, without adverse effect.

There are no identified scenic routes within or immediately adjacent to the subject site. The closest designated scenic view is to the north of the proposed substation location – V22 refers. The scenic view is however oriented in the opposite direction to the proposed development and therefore it is not considered that it would be adversely impacted by the undertaking of the development.

Environmental Management – It is noted that a Construction and Environmental Management Plan (CEMP) has been submitted as part of the application documentation. It is essential, in the event of the granting of planning permission, that the applicants / developers are obligated to implement the range of mitigatory measures proposed within the CEMP and other documentation, including for example the appointment of an Ecological Clerk of Works (ECOW) to oversee the implementation of the construction phase mitigation and the preparation and implementation of an invasive species management plan.

Development Contributions – As noted in Section 7 of this submission, at the present time, the *Development Contribution Scheme 2014 (as amended 2020)* is in effect. As set out in Table 5 of the Scheme, wind farm developments warrant a development contribution of €6,000 per MW of capacity. It is acknowledged that as per the permission granted by An Bord Pléanala for the associated Seven Hills windfarm, development contributions were levied. Although associated with the windfarm, the nature of the currently proposal is considered to largely constitute enabling infrastructure and the currently applicable Development Contribution Scheme would not give rise to the proposal being liable for payment of a standard contribution. Notwithstanding this, the Council consider, as highlighted in the report from the Roads Department,⁴ that the proposed project will inevitably lead to ongoing carriageway maintenance and repair works long after the defects liability period has expired and accordingly it is recommended that the an annual maintenance contribution of €2000/km of affected roadway be requested from the develop, in the event of the granting of planning permission.

⁴ Refer to Appendix 1.

11.0 Conclusions and Recommendation

Having regard to all of the foregoing considerations, it is considered that the proposed development is acceptable in principle and at a strategic level accords with relevant national, regional and local planning policy.

Roscommon County Council acknowledges that the current proposal is intrinsically linked and necessary for the implementation and operation of the permitted Seven Hills Windfarm, and having regard to that interlinkage, the proposed project is considered by Roscommon County Council to be an essential component of the overall renewable energy development. As such, the permitted windfarm and the currently proposed development are recognised as collectively having the potential to make a substantial contribution to the achievement of Ireland's binding renewable energy generation and greenhouse gas abatement targets.

The Council is generally satisfied that likely adverse environmental effects resulting from the proposed development have been identified and that it has been demonstrated that they can be sufficiently managed and mitigated. Against this backdrop of broad support however are concerns in respect of the impact of the development on the public road network and in this regard it is respectfully requested that key road infrastructure considerations raised by the Council in its role as Roads Authority (and as set out in detail in Appendix 1 of this submission) be given due consideration in the Board's assessment of this Strategic Infrastructure Development proposal.

APPENDIX 1

Roscommon County Council – Roads Department Response

Roads Section Planning Report

Planning Ref. No:	Strategic Infrastructure Development proposal (Moyvannon substation and 7.5km underground electricity line)
Applicant:	Gaeltech Energy Services
Proposed Development:	(i) A 110 kilovolt (kV) 'loop-in/loop-out' Air-Insulated Switchgear (AIS) electricity substation, including a single-storey control building (with a Gross Floor Area of 450 square metres) and all associated electrical equipment and services within a 2.6 metre high fenced compound (with a total footprint of approximately 8,500 square metres); (ii) Replacement of 1 no. existing wooden pole-set with 2 no. lattice-type interface masts, each of which will be between 15 and 18 metres in height, to facilitate connection of the 110kV underground electricity lines to the existing Athlone-Lanesborough 110kV overhead electricity transmission line; (iii) Approximately 270 metres of 110kV underground electricity line between the electricity substation and the interface masts; (iv) Approximately 630 metres of access tracks with associated upgrade works to an existing agricultural entrance from the L7551 local road; (v) Approximately 7.5 kilometres of 110kV underground electricity line between the electricity substation and the junction of the L7636 local road and R363 regional road where the electricity line will connect to electricity cables permitted as part of the Seven Hills Wind Farm (An Bord Pleanála Reference ABP-313750-22). The electricity line will be placed within private lands and within the carriageway of the L7551, L7556, L2018, L7731, R362, L2023, and L7636; and, (vi) All associated and ancillary site development, excavation, construction, landscaping and reinstatement works and the provision of site drainage infrastructure and surface water protection measures.
Date:	14/01/2025
Roads affected:	L7551, L7556, L2018, L7731, R362, L2023, and L7636

Recommendations

Roscommon County Council roads department would have concerns about the long term effect that the proposed works will have on the local road network included in the route. Significant constraints will be placed on RCC with respect to all future works along the proposed route. To ensure roads resilience of the proposed project over the entire route please see comments and recommendations below.

1. The design information submitted is not of sufficient detail for us to make a proper assessment of the impact of the proposed development on the road network for the following reasons
 - Information provided in the application does not adequately address the concerns raised by the roads department at pre application meeting
 - Drawings with respect to cable route and cable locations within the cross section of the road network are generic and consequently are difficult for us to assess
 - Joint bay locations are important as they are considered to potentially have a major impact on the road network during and after construction. Drawings with respect to joint bay locations within the cross section of the road network are generic and consequently are difficult for us to assess. It appears that there are 12 joint bays along the proposed route, this will have a major impact on these local roads. Potential locations for and agreed depths of joint bays can only be approved following further consultation with the roads department
 - The red line boundary is considered to be insufficient to adequately address concerns of the roads authority as it is our preference that all cables and joint bays are at least 1.2m from the edge of the public road
 - We consider the information provided to be lacking in detail and does not adequately reflect, in any document, the impact that the proposal will have on the local road network

If the application is successful, prior to commencement of the project Roscommon County Council considers it essential that the applicant engage with the council and as part of the process provide a survey of the cabling route along the public roads which will clearly show the road cross sections and the extent of the adjacent available verge.

Roscommon County Council will require the applicant to carry out full lane reinstatement on all public roads where cabling is within the carriageway.

Reinstatement of the trench in local and regional roads shall be in accordance with the latest version of “Guidelines for the Opening, Backfilling and Reinstatement of Trenches in Public Roads” (The Purple Book), except where noted otherwise.

2. Details of the wearing course permanent reinstatement are to be agreed with the roads department and shall be shown on a separate set of drawings with appropriate background mapping for consideration.

Again for clarity the preferred position for the cabling shall be in the verge at least 1.2m from the road edge. A road opening licence will be required from Roscommon County council for all works within the public road space.

The applicant is required to consult with Roscommon County Council Road Design Department in advance of resubmitting the revised proposals.

3. In the event that in the future the proposed infrastructure is required to be relocated to accommodate future road development or improvements along the route, the full costs and responsibility of such relocation shall be borne by the statutory undertaker in charge of the cable and ancillary infrastructure.
4. Roscommon County Council roads department are of the opinion that the proposed project will inevitably lead to ongoing carriageway maintenance & repair works long after the defects liability period has expired and require an annual maintenance contribution of €2000/km of affected roadway from the developer.

General

- A Construction Management Plan shall be submitted to RCC. Contents to include implementation of planning conditions and EIS requirements.
- RCC to be advised of details of PSDP, PSCS and contractors.
- A road opening licence will be required from RCC
- Insurances
- Performance bond
- A dedicated liaison Engineer will need to be appointed by RCC and all associated costs covered by the Developer.
- Developer to consult with An Garda Síochána, emergency services and bus operators in relation to each stage of the works
- Liaison with the public, residents, businesses, schools & elected representatives along all the affected routes.

Cable Route Conditions:

- Details of cable installation to be submitted to RCC in advance of commencement of works. Details to include works programme, construction details, cross-sections for each road showing location of trench in road and any existing services.
- Where road closures are required, an application must be submitted to RCC at least 8 weeks in advance.
- Where road works speed limits are required, an application shall be submitted to RCC at least 8 weeks in advance. Signs to be erected by the developer.
- Diversion routes to be maintained whilst any diversion is in place.
- Traffic management plans to be submitted for each stage of the works.
- Pre-condition survey of cable routes, consisting of a video survey of the full route and photographs at every entrance and boundary structure to be carried out and a copy submitted to RCC. Any damage caused to the road or adjacent properties shall be repaired to its previous condition, to the satisfaction of RCC and/or landowner.
- Pre-condition structural surveys on adjacent properties shall be carried out where necessary.
- All works shall be in accordance with the TII Specification for Road Works unless otherwise specified.
- Reinstatement of the trench in local and regional roads shall be in accordance with the latest version of “Guidelines for the Opening, Backfilling and Reinstatement of Trenches in Public Roads” (The Purple Book), except where noted otherwise.

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- Reinstatement of the trench in national roads shall be in accordance with the latest version of “Specification for the Reinstatement of Openings in National Roads”, except where noted otherwise.
 - After temporary reinstatement of the trench:
 - A full width overlay shall be provided on all Local & Regional roads.
 - Reinstatement on national roads are to be agreed with TII and RCC
 - All permanent restoration shall be agreed with RCC.
 - Ironworks shall be raised & reset as necessary and road markings and road studs reinstated.
 - All existing watercourse crossings/bridges shall be identified and detailed designs submitted to indicate how these will be crossed.
 - All existing surface water drainage affected by the works to be surveyed & redesigned if required in agreement with RCC.
 - The developer shall allow in his programme for accommodation of local events, such as charity walks and cycles.
 - A defects liability period of 2 years shall apply. This shall commence when written notification has been given that the permanent reinstatement/overlay has been completed.

Signed:



John Freeman
Senior Executive Engineer

Date: 14/01/2025