

An Bord Pleanála,
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January 15th, 2025

SID Observation submitted online through the required SID portal on the An Bord Pleanála Website

**OBSERVATION SUBMITTED TO AN BORD PLEANÁLA IN THE PROPOSED STRATEGIC
INFRASTRUCTURE DEVELOPMENT OF A 110 KILOVOLT ELECTRICITY SUBSTATION,
APPROXIMATELY 7.5 KILOMETRES OF UNDERGROUND ELECTRICITY LINE AND ALL
ASSOCIATED WORKS**

ABP Case Reference: VA20.321238

Location: Moyvannan, Feamore, Lisbaun, Carrownolan, Carrowncloghan, Carrowkeeney, Ardmullan, Curraghboy, Gortnasythe, Derryglad, Eskerbaun & Brideswell, Co. Roscommon

Applicant: Energia Renewables ROI Limited

Application Lodged: 12/11/2024

Local Authority: Roscommon County Council

Observation submitted by: Christopher Walsh & Mairéad Farrell

Date of Observation Submission: 15/01/2025

Address: Cam, Brideswell, Co. Roscommon, N37 Y656

We hereby seek to make an observation on the aforementioned development predicated upon the following grounds:

Insufficient assessment of the impacts to Roads and Traffic

The Applicant states that, "the underground electricity line will, from the electricity substation, be located within private lands and within the L7551, L7556, L2018, L7731, R362, L2023, and L7636 to its junction with the R363" (EIAR 3:1). However, the Applicants impact assessment on traffic and transport;

- fails to sufficiently assess the impacts of the Development on both regional and local roads,
- fails to assess the cumulative impact of other developments in the area on traffic and transport,
- in some cases omits the roads listed above altogether, in their impact assessment on traffic and transport,
- ignores guidance received from regulatory bodies on the key areas to be considered as part of their impact assessment.

Please find below, details which should be considered when reviewing this planning application;

1. The "junction with the R363" in Brideswell is the location where the electricity line will connect to electricity cables permitted as part of the Seven Hills Wind Farm. Despite this, the R363 is only referred to fleetingly in the Environmental Impact Assessment Report (EIAR), Chapter 12: Material Assets. The R363 is referenced three times in Chapter 12 of the EIAR despite it being a busy commuter route;
 - "Access to the route of the underground electricity line will be via the L7551, L7556, L2018, L7731, and L7636 local roads and the R362 and **R363** regional roads." (EIAR 12:5)
 - Regional roads in the vicinity of the project site; including the R362 and **R363** which may also be utilised to transport construction materials; are assessed to be generally of good quality, however, localised evidence of surface deterioration was noted during fieldwork. (EIAR 12:5)
 - "The **R363** regional road is also a two-lane carriageway predominately bounded by hedgerows. In rural areas, the road has an 80kph speed limit and there is no evidence of street lighting or pedestrian footpaths." (EIAR 12:5)

However, in none of the references to the R363 mentioned above has the Applicant evaluated the impact of the Moyvannan Substation Development on the R363, as a standalone development, or cumulatively with other developments.

This is despite the R363 being highlighted in **EIAR Annex 2.4 (Appendix 1)** as one of the delivery routes for material to the site of the substation from potential suppliers, routes which the Applicant have described as "the most appropriate to ensure the

protection of the road network in the region". This proposed R363 route, joins up with the proposed routes for two further suppliers at the R362, which directs the increased volume of HGVs towards the Monksland area of Athlone, which is a significantly more densely populated area close to schools and residential zones. In the Applicants' assessment, they have not assessed how the development and increased number of HGVs will impact road safety in these areas, as a standalone development, or cumulatively with other developments. See **EIAR Annex 2.4 (Appendix 1)**

In addition to the lack of sufficient impact assessment on the R363 for Moyvannan development as a standalone development, the Moyvannan substation appears to be functionally and operationally linked to the Seven Hills Wind Farm. Key elements suggest project splitting. The substation's primary purpose is to facilitate the grid connection for the Seven Hills Wind Farm, a fact acknowledged in the project's EIAR. The substation and wind farm cannot function independently in their intended capacity. By treating the substation as a standalone development, the EIAR attempts to circumvent the need to assess broader environmental effects, potentially violating Article 3 of the Environmental Impact Assessment (EIA) Directive (Directive 2014/52/EU amending 2011/92/EU). Under EU law, project splitting undermines the ability to assess cumulative impacts and violates the principles of comprehensive environmental evaluation.

The EIA Directive (Article 3 and Annex IV) mandates that the entire project, including direct, indirect, and cumulative impacts, must be assessed. The practice of omitting interrelated components, such as associated infrastructure or linked developments, is seen as an attempt to bypass stricter review processes.

Key Case Law:

- **Ó Grianna v. An Bord Pleanála [2014] IEHC 632:** The Irish High Court quashed permission for a wind farm because the developer failed to include the associated grid connection infrastructure in the EIA, viewing it as integral to the overall project.
- **Sweetman v. An Bord Pleanála [2009] IEHC 450:** Highlighted the obligation to consider cumulative effects of linked projects, as failing to do so undermines the integrity of the assessment process.

The Department of Housing, Local Government and Heritage, have pointed out to the Applicant that the Moyvannan Development is in fact part of the infrastructure of the permitted Seven Hills Wind Farm during pre-consultation and that the cumulative impacts needed to be assessed;

"We recommended that the potential cumulative impacts of the proposed development along with those of the permitted Seven Hills Wind Farm (An Bord Pleanála Ref. ABP-313750-22) and the proposed Eirgrid Athlone to Lanesborough

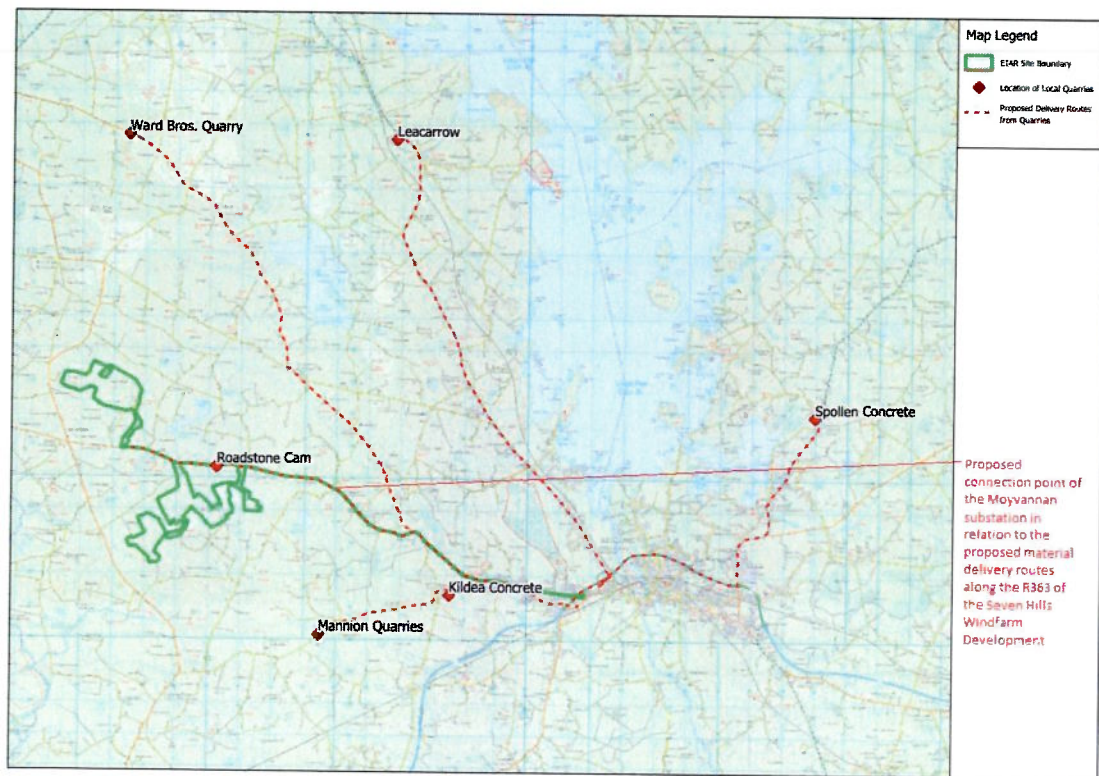
110 kV line uprate should be evaluated. **We further note that the proposed development is in fact part of the infrastructure of the permitted Seven Hills Wind**

Farm (An Bord Pleanála Ref. ABP-313750-22), that the proposed electricity substation and cables should have formed part of the planning application for the permitted Seven Hills Wind Farm and that the failure to have done so constitutes a lacuna in the planning process for the permitted Seven Hills Wind Farm (as in O’Grianna & Ors. V. An Bord Pleanála ([2014] IEHC 632)).” **EIAR Annex 1.5** (*Appendix 3, Pg 13*)

Despite this, the Applicant has failed to sufficiently assess the cumulative impact on the R363 of the Moyvannan Substation Development and the Seven Hills Wind Farm Development, of which the Seven Hills Windfarm Development will already utilise the R363 for;

- The provision of 2 no. new site accesses north and south from the R363 and upgrade of 1 no. junction south of the R363,
- The laying of grid connection cabling within the public road corridor of the, R363 or on private land, and upgrade works to the existing 110kV Athlone substation consisting of the construction of an additional dedicated bay to facilitate connection of the cable,
- The delivery of turbine components for the SID which are going to arrive to a port in Galway and be transported by vehicle to Athlone where they will be driven from Monksland via the R362 & R363 to the development site.
- Deliveries of stone and ready-mix concrete for use in the construction of the proposed development – all of which will utilise the R363 to access the Seven Hills Windfarm Development as shown in the image below*;

**Proposed delivery routes for stone and ready-mix for the Seven Hills Wind Farm Development in relation to the proposed connection point of the cabling from the Moyvannan Substation Development to the Seven Hills Wind Farm Development cabling.*



The Applicant has also failed to take into account the cumulative traffic impacts of other developments within the site footprint along the R363 including the granting of permission by Roscommon County Council for the development within an application area of 6 Ha., which will consist of: Use of up to 190,000 tonnes of imported inert natural materials, principally excess soil, stones and/or broken rock to partially fill and restore a disturbed landform created by previous extraction of sand and gravel. The development will be completed within 9 years (which includes a restoration period of up to 2 years); Proposed infrastructure including, site office, staff welfare facilities, weighbridge, wheelwash, hardstand areas, waste inspection and quarantine facility and covered shed; Temporary stockpiling of topsoil and subsoil pending re-use as cover material for final restoration of the site; Restoration of the excavated landform (including placement of cover soils and seeding) to natural habitat and grazing. An Environmental Impact Assessment Report has been submitted with this application at Knocknanool Townland, Brideswell, Athlone, Co. Roscommon. This development will also increase the number of HGVs on the R363 on a daily basis but has been omitted by the Applicant.

The R363 is a busy commuter route used to reach main routes to Athlone, Dublin and Galway. The R363 in Brideswell specifically, has been a focal point for traffic safety concerns and proposed improvements. The R363 is a key transport route for the

completion of this SID, and the cumulative traffic impact of the Moyvannan Substation, the Seven Hills Wind Farm and the Soil Waste Recovery Facility on this road extends to a far greater site footprint than that assessed in the impact assessment of the Applicant. The Applicant, while making some references to combined number of HGV deliveries of both Moyvannan and Seven Hill Wind Farm developments, does not actually assess the cumulative impact of these figures on the R363 or the proposed delivery routes which pass by schools and highly populated residential areas once the true scale of the site footprint is assessed cumulatively. The Applicant also fails to assess the cumulative impacts relating to grid connection cabling and safety concerns on the route due to the cumulative increase in traffic in the area due to these projects.

2. The R362 is another key transport route in the Moyvannan Substation Development proposal, yet despite the Applicants reference to the impact the Moyvannan substation Development will have on the Seven Hills Wind Farm Development, i.e.

- “In the event that Ward Bros. Quarry is selected as a supplier of materials for the Seven Hills Wind Farm Development, due to the laying of underground electricity line within the R362 for c. 330m within the townland of Derryglad as part of the Moyvannan Substation Development, an alternative delivery route will need to be identified while the trenching works are carried out on the R362”,

The Applicant has once again failed to assess the cumulative impacts of the Moyvannan Substation Development and the Seven Hills Wind Farm Development. As mentioned above the R362 is also a key route identified in the EIAR for the Seven Hills Wind Farm Development, which is functionally and operationally linked to the Moyvannan Substation Development. The Applicant has again made reference to the link between the two projects and the potential cross over of delivery routes, but have failed to actually assess the cumulative impacts of the projects, which, due to the interdependence of the two projects on one another, need to be considered, including;

- The laying of grid connection cabling within the public road corridor of the, R362 or on private land, and upgrade works to the existing 110kV Athlone substation consisting of the construction of additional dedicated bays to facilitate connection of the cable,
- The delivery of turbine components for the SID which are going to arrive to a port in Galway and be transported by vehicle to Athlone where they will be driven from Monksland via the R362 to the development site.
- Deliveries of stone and ready-mix concrete for use in the construction of the proposed development – All proposed material delivery routes for the Seven Hills Wind Farm, bar one, will utilise the R362 to access the Seven Hills Windfarm Development as shown in the image above, however, the Applicant has only included a brief note on the impact to the Seven Hills Windfarm Development proposed delivery route should Ward Bros be awarded the contract. However, the proposed delivery routes for Mannion Quarries, Kildea Concrete, Spollen Concrete and Whelan’s Limestone Quarries Ltd will all use the R362 from Monksland on their proposed routes to the Seven Hills Wind Farm Development. Three of the

proposed delivery routes for suppliers to the Moyvannan Substation development also follow the route mentioned above, through Monksland, Athlone. This route will involve an increase in HGVs near schools and highly populated residential areas and the cumulative impact both projects on this area has not been assessed by the Applicant.

The site footprint for which the Applicant needs to assess the impact on traffic and transport is much larger than the area focused on by the Applicant, once the cumulative impact of all developments in the areas are considered.

3. Further to this, the Applicant has not assessed the impact on traffic and transport, and their own proposed delivery routes due to flooding around Lough Funshinagh in their impact assessment.

In the Applicants proposed route for delivery of materials from Ward Bros quarry for example, the Applicant has proposed the most appropriate delivery route be via the R362 - See **EIAR Annex 2.4 (Appendix 1)**. In April 2024, "Roscommon County Council announced that the R362 at Coolnageer, Curraghboy, would close from Friday for **"the minimum period necessary"**. The council indicated that the road would be closed for two-three months and hopes it will reopen by August 1st. A diversion route has been put in place locally and the council warned there "may be an increased likelihood of delays on these roads as a consequence" (*Irish Times* - <https://www.irishtimes.com/lough-funshinagh>).

Despite this, the Applicant has not assessed the impact of flooding on the route, road conditions nor mitigated against the risk of flooding on this route, or other roads in the region in their impact assessment.

The Applicant also failed to take account of the cumulative impacts of the Interim flood relief scheme to pump water from Lough Funshinagh and discharge to Cross River development (**ABP 320869** - <https://www.pleanala.ie/en-ie/case/320869>), of which works will impact the R362 and surrounding areas, yet the Applicant failed to include any cumulative impacts of this project in their assessment of impacts on roads and traffic. Due to diversions, Roscommon County Council have acknowledged "an increased likelihood of delays on these roads as a consequence" of Lough Funshinagh flooding, yet the Applicant have failed to account for the cumulative impact from this in their assessment of the capacity of the local and regional road network to accommodate any traffic diversions during the Moyvannan development.

4. The Applicant states that "The electricity substation will be connected to the permitted Seven Hills Wind Farm grid connection infrastructure via c. 7.5km of 110kV underground electricity line. From the substation, the electricity line will be located within the proposed access track to its junction with the L7551 local road and will then follow the L7551, L7556, L2018, L7731, R362, L2023, and L7636 to its junction with the R363 at Brideswell." (**EIAR 3:11**).

In the below table from the (**EIAR 12:10 & continued on 12:11**) * the Applicant calculates the Estimated Materials and Associated Number of Vehicle Movements for

the Construction Phase, and even go as far as calculating that this will only equate to an “estimated average daily increase of 9 no. HGV movements”.

They further highlight the proposed delivery routes for imported materials using HGVs from the various quarries in the vicinity, which are all along National and Regional roadways. However, these routes are for the delivery directly to the Substation Site location itself as seen in **EIAR Annex 2.4 (Appendix 1)**.

*** Estimated Materials and Associated Number of Vehicle Movements for the Construction Phase (EIAR 12:10 & continued 12:11)**

Material	Quantity	Deliveries/Trips
Electricity Substation		
Site mobilisation (incl. plant, machinery, traffic management measures/equipment, etc.)	-	25
Imported stone for substation compound, access track, electricity line trenches, construction compound, and drainage	7,710m ³	907
Concrete (substation compound, buildings, and interface masts)	160m ³	20
Miscellaneous construction materials (incl. blocks, slates, doors, fencing, landscaping plants/vegetation, etc.)	-	30
Electrical equipment (incl. busbars, insulators, cable sealing ends, interface masts, and lightning poles, etc.)	-	40
Site de-mobilisation (removal of plant, machinery, temporary structures, traffic management measures/equipment, etc.)	-	25
Underground Electricity Line		
Site mobilisation (incl. plant, machinery, traffic management measures/equipment, etc.)	-	10
Export of excavated material from trench	10,550m ³	1,242
Electrical ducting & cabling	-	35
Imported backfill material (concrete)	4,240m ³	530
Imported backfill material (stone)	4,777m ³	562
Imported road re-surfacing material (tar & chips)	2,220m ³	278
Site de-mobilisation (removal of plant, machinery, traffic management measures/equipment, etc.)	-	10
Material	Quantity	Deliveries/Trips
management measures/equipment, etc.)	-	-
Total	-	3,714

The Applicant failed to highlight the fact that 72% of the calculated Construction Phase trips are related to electricity line trench with only 28% being related to the electricity Substation (see calculations below).

Material	Quantity	Deliveries/Trips	Percentage of Total Trips for the Development
Electricity Substation - Site mobilisation (incl. plant, machinery, traffic management measures/equipment, etc.)	-	25	
Electricity Substation - Imported stone for substation compound, accesstrack, electricity line trenches, construction compound, and drainage	7,710 m³	907	
Electricity Substation - Concrete (substation compound, buildings, and interface masts)	160 m³	20	
Electricity Substation - Miscellaneous construction materials (incl. blocks, slates, doors, fencing, landscaping plants/vegetation, etc.)	-	30	
Electricity Substation - Electrical equipment (incl. busbars, insulators, cable sealing ends, interface masts, and lightning poles, etc.)	-	40	
Electricity Substation - Site de-mobilisation (removal of plant, machinery, temporary structures, traffic management measures/equipment, etc.)	-	25	
Total Trips for the Substation Site		1,047	28%
Underground Electricity Line - Site mobilisation (incl. plant, machinery, traffic management measures/equipment, etc.)	-	10	
Underground Electricity Line - Export of excavated material from trench	10,550 m³	1,242	
Underground Electricity Line - Electrical ducting & cabling	-	35	
Underground Electricity Line - Imported backfill material (concrete)	4,240 m³	530	
Underground Electricity Line - Imported backfill material (stone)	4,777 m³	562	
Underground Electricity Line - Imported road re-surfacing material (tar & chips)	2,220 m³	278	
Underground Electricity Line - Site de-mobilisation (removal of plant, machinery, traffic management measures/equipment, etc.)	-	10	
Total Trips for the Electricity Line Trench		2,667	72%
Total Trips Development	-	3,714	

In addition to this, when we analyse the data further for the number of deliveries/trips related solely to **imported materials**, we see that imported materials trips for the electricity Line trench account for 37% of the total trips for the development.

Therefore, only 25% of the trips in the overall project, relates to imported materials from quarries in the vicinity to the substation site which would use the proposed delivery routes in EIAR Appendix 2.4, where a minimum of 37% of trips will heavily rely on the Regional and Local Roads outlined in the EIAR i.e. L7551, L7556, L2018, L7731, R362, L2023, and L7636 to its junction with the R363 at Brideswell." (EIAR 3:11).

Material	Quantity	Deliveries/Trips	Percentage of Total Trips for the Development
Electricity Substation - Imported stone for substation compound, accesstrack, electricity line trenches, construction compound, and drainage	7,710 m ³	907	
Electricity Substation - Concrete (substation compound, buildings, and interface masts)	160 m ³	20	
Total Trips for the Substation Site (IMPORTED MATERIALS)		927	25%
Underground Electricity Line - Imported backfill material (concrete)	4,240 m ³	530	
Underground Electricity Line - Imported backfill material (stone)	4,777 m ³	562	
Underground Electricity Line - Imported road re-surfacing material (tar & chips)	2,220 m ³	278	
Total Trips for the Electricity Line Trench (IMPORTED MATERIALS)		1,370	37%
Total Trips Development	-	3,714	

33% of the total trips calculated by the Applicant for the duration of the construction phase relate specifically to the export of the material from the electricity line trench.

Material	Quantity	Deliveries/Trips	Percentage of Total Trips for the Development
Underground Electricity Line - Export of excavated material from trench	10,550 m ³	1,242	33%
Total Trips Development	-	3,714	

Finally, and most significantly, 70% of the total trips calculated by the Applicant for the duration of the construction phase relate specifically to the combined import and export of material to and from the electricity line trench.

Material	Quantity	Deliveries/Trips	Percentage of Total Trips for the Development
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Underground Electricity Line - Export of excavated material from trench	10,550 m ³	1,242	70%
Underground Electricity Line - Imported backfill material (concrete)	4,240 m ³	530	
Underground Electricity Line - Imported backfill material (stone)	4,777 m ³	562	
Underground Electricity Line - Imported road re-surfacing material (tar & chips)	2,220 m ³	278	
Total Trips for the Electricity Line Trench (EXPORTED & IMPORTED MATERIALS)		2,612	
Total Trips Development	-	3,714	

If we now analyse the Electricity Line Trench route between Regional and Local Roads we can see that 96% or 7.2kilometres of the 7.5 kilometres of electricity line trench is located on or along local roads ($(7.2\text{km} / 7.5\text{km}) * 100\% = 96\%$). See mapping of the route on Google Maps which can be compared to **EIAR Annex 3.1 (Appendix 2)** to prove the same route was followed during my analysis. Other than the 300m of electricity line construction works that will occur on the R362, all other electricity line construction works will occur on local roads. *

*As the Applicant has not provided exact coordinates of the substation site, when mapping the route on Google Maps I have followed the route per their site location map shown in **EIAR Annex 3.1 (Appendix 2)** ensuring the distance travelled is 7.5km from the start point in Moyvannan, where the Substation site is located, to the Junction of the R363, as per the electricity line length in the Applicants EIAR.

Local roads linked to the electricity line have been identified by the Applicant as L7551, L7556, L2018, L7731, and L7636 in Chapter 12 (EIAR 12:6). Despite the calculations above showing the importance of these local roads to the development, and the percentage of the overall calculated HGV trips which will utilise these roads, the L2018, L7731, and L7636 only feature in Chapter 12: Materials Assets of the EIAR once;

- “Access to the route of the underground electricity line will be via the L7551, L7556, L2018, L7731, and L7636 local roads and the R362 and R363 regional roads.” (EIAR 12:6)

The above is a statement of fact, not an assessment of impact, and whether by design or by error, the Applicant has not considered the impact to these roads in their EIAR.

There is also no mention whatsoever in Chapter 12: Material Assets of the L2023 which is also impacted by the construction phase of the electricity line from the R362 to the junction with the R363 in Brideswell where the electricity line will be connected with the line from the Seven Hills Wind Farm. Again, whether by design or by error, the Applicant has not considered that the impact to the L2023 in their EIAR. Brideswell national school and local businesses in Brideswell will be impacted by the works on the L2023.

The Applicant has provided brief descriptions of L7556 and L7551, which are the local roads which will be used to access the substation site from the N61;

- “The L7556 is a single-lane carriageway which is generally of good condition; however, there is evidence of surface deterioration at a number of locations.” (EIAR 12:5)
- “The L7551 is a narrow single-lane carriageway; bounded by hedgerows and stone walls; which appears to be lightly trafficked and is unlikely to be utilised by through-traffic. While the surface of the road displays a substantial degree of degradation, it is assessed to be of a sufficient condition for the likely volumes of traffic.” (EIAR 12:5)

Similarly, in Chapter 3: Description of the Project of the EIAR the Applicant only provides very brief details of the roads close to the substation site, paying little to no consideration to the impacts to local roads impacted by the electricity line.

As mentioned previously, whether through design or error, the Applicant has neglected to effectively assess the impact on traffic and roads on local routes which are critical to the development, focusing only on the substation site, despite the majority of the HGV trips per their own calculations, being related to the electricity line trench works. The calculations above prove, based on the data of the Applicant, that at least 2,560 HGV trips will use these local roads to complete the trips required during the construction phase of the electricity line trench, and the Applicant have not assessed the impacts on these roads in Chapter 12: Materials Assets of the EIAR.

Transport Infrastructure Ireland (TII) provides specific guidelines for conducting Traffic and Transport Assessments (TTAs), particularly for large-scale developments such as

Strategic Infrastructure Development (SID) projects. These guidelines are designed to ensure that infrastructure projects properly assess and mitigate their impacts on the road network, traffic flow, and public safety. Guiding documents include, but are not limited to;

- Traffic and Transport Assessment Guidelines (2014) – GE-TAS-02045
- Traffic Management Guidelines (2003) – TII and the Department of Transport
- Design Manual for Roads and Bridges (DMRB) – TII's standards for road design and safety
- Transport Impact Assessment (TIA) Guidelines – Specific to large developments impacting national roads

These guidelines include CORE requirements for SID applications including an evaluation of how **local, regional**, and national roads interact with the proposed development.

Despite the number of HGV trips calculated above requiring the use of local roads, the Applicant has only performed a “windshield survey of the electricity line route” and “noteworthy locations along the underground electricity line route were the subject of a walkover survey” (*EIAR 12:3*). A windshield survey alone is not sufficient to meet the Transport Infrastructure Ireland (TII) Traffic and Transport Assessment Guidelines regarding the assessment of Heavy Vehicle Movements and Road Integrity for energy projects like **substations** or wind farms. A windshield survey typically involves visually inspecting the route from a moving vehicle. While this can provide a general overview of the road conditions, it lacks the detail and technical analysis required to assess whether local roads can structurally support Heavy Goods Vehicles (HGVs). As highlighted above, The Applicant has;

- **NOT** performed a sufficient structural capacity assessment of the impacted local or regional roads to determine if the road can handle the weight of HGVs;
- **NOT** performed an investigation of potential subsurface weaknesses on local and regional roads highlighted in their EIAR that could worsen under heavy traffic loads – significant flooding risk in the areas surrounding the development could impact the subsurface of these roads and R362 has been impacted by serious flooding in the last 12 months but no impact assessment has been carried out by the Applicant to assess any subsurface damage to the road,
- **NOT** collected measurable data, or in some cases any data at all, for the local roads impacted by the development, yet preferred to focus their assessment on National and regional routes towards the substation site, including when proposing delivery routes, despite the data clearing showing that the number of HGV trips that will travel local roads during the electricity line construction phase, will be far greater than the trips required for the Substation construction phase.;
- **NOT** considered the impact on vulnerable road users e.g. school zone on the L2023 which has been omitted from Chapter 12: Material Assets of the EIAR. The Applicant has also failed to consider the cumulative impact on these users within the full site

footprint when the Seven Hills Wind Farm and other developments that will extend the footprint as far as Monksland, Athlone.

- **NOT** considered all, or even the majority of, HGV trips and associated risks to roads and traffic for the project, and whether by design or error, have focused on movements/routes for proposed imported materials that would only account for c.25% of the total HGV movements of this project. Then there is the cumulative impact of HGV movements of related and other developments in the area e.g. Seven Hills Wind Farm or the Soil Waste Recovery Facility which are both heavily reliant on an increase in traffic on the R363, which is also one of the major routes highlighted in this development.

An Bord Pleanála has refused planning permission for proposed **wind farms and energy infrastructure projects in the past due to inadequate assessments of their impact on roads** and traffic. Notable examples include:

- **Derrinlough Wind Farm, County Offaly:** In this case, the Board refused permission, citing concerns about the ***potential impact on the local road network***. The decision highlighted that the proposed development would involve **significant use of local roads during the construction phase, which could lead to deterioration of road surfaces and pose safety risks**. The Board concluded that the applicant had not adequately assessed these impacts or proposed sufficient mitigation measures.
- **Carrownagowan Wind Farm, County Clare:** An Bord Pleanála refused permission for this project, noting that the **proposed development would generate substantial construction traffic, including heavy goods vehicles, on local roads that were not designed to accommodate such loads**. The Board found that **the applicant's assessment of the impact on the road network was insufficient** and that the proposed mitigation measures were inadequate.

I am aware that these examples are of Windfarms and not Substations specifically, but they do fall under energy infrastructure, and highlights energy infrastructure planning applications which has previously been refused permission by An Bord Pleanála due to insufficient consideration for the impact on local roads by Applicants. While the Applicant may argue that the examples above had higher volumes of traffic, the analysis of their own data I have provided above shows that they have insufficiently assessed the impact on local roads of c.70% of the expected total HGV trips during the construction phase of their proposed development – a percentage of missing assessment which should not be tolerated in reviewing any planning application.

5. As mentioned above, The Applicant has not assessed the cumulative impact on traffic and transport of any significant developments in the area, most notably;

- Seven Hills Wind Farm (*ABP-313750-22*)
- Soil Waste Recovery Facility (*Planning Application: 2360269 (Roscommon Co. Co.)*)

This is despite receiving correspondence from Transport Infrastructure Ireland (TII) during the pre-consultation, **EIAR Annex 1.5** (*Appendix 3*), where TII have advised the Applicant;

- “The developer should have regard to any EIAR/EIS and all conditions and/or modifications imposed by An Bord Pleanála regarding road schemes in the area. The developer should, in particular, have regard to any potential cumulative impacts.” **EIAR Annex 1.5** (*Appendix 3, Pg 61*)

This is evidence that the Applicant were aware of the requirement to assess cumulative impacts but have chosen to ignore the guidance from TII in their EIAR.

TII also expressed their specific concerns around the impact the development would have on the national road network (and junctions to same) including the potential haul routes;

- “TII would be specifically concerned as to potential significant impacts the development would have on the national road network (and junctions with national roads) in the proximity of the proposed development, including the potential haul route.” **EIAR Annex 1.5** (*Appendix 3, Pg 61*)

Despite this, the Applicant, as shown above through analysis of the data provided by the Applicant, have not performed any detailed analysis of the impact HGVs will have on junctions with local routes with the national road network, despite at least 2,508 of the total trips required for the import and export of materials having to use these local roads, and as a result, these trips will impact junctions to the national road network.

Conclusion

I urge An Bord Pleanála to consider the foregoing observation seriously and refuse planning permission for this development. The development lacks sufficient assessment of the impact on local roads and cumulative impact assessments on roads and traffic with other developments in the area, some of which are functionally and operationally linked to the Moyvannan Substation, for which the Applicant was advised by both Transport Infrastructure Ireland and Department of Housing, Local Government and Heritage would be critical in the preparation of their EIAR.

Respectfully submitted,

/s/ Christopher Walsh

&

/s/ Mairéad Farrell



Moyvannan Electricity Substation

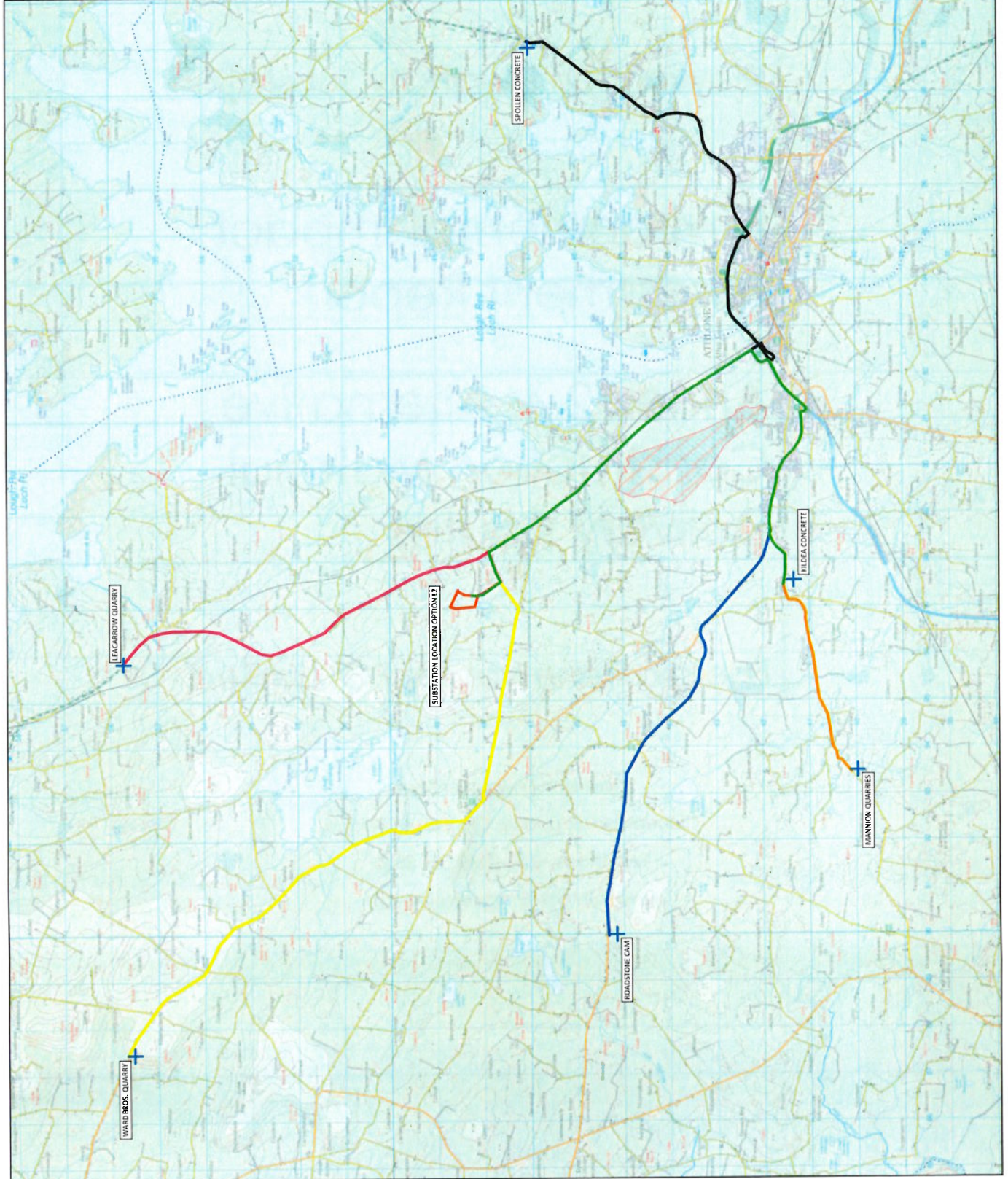
Environmental Impact Assessment Report

Annex 2.4: Alternative Construction Material Delivery Routes

Energia Renewables ROI Limited

Galetech Energy Services
Clondargan, Stradone, Co. Cavan Ireland
Telephone +353 (0)49 555 5050
www.galetechenergyservices.com





LEGEND

- CONSTRUCTION MATERIAL SUPPLY LOCATIONS
- KILDEA CONCRETE ROUTE
- LEACARROW QUARRIES ROUTE
- C&M QUARRY ROUTE
- MANNION QUARRIES ROUTE
- SPOLLEN CONCRETE ROUTE
- SUBSTATION LOCATION OPTION L2



Date	Rev.	Description	Drawn By

Galetech Energy Services
Clonsilla, Stradone
Co. Cavan H12 NV06
info@galetechenergy.com
www.galetechenergy.com



Client: ENERGIA RENEWABLES ROI LTD
Job Title: MOYVANNAN ELECTRICITY SUBSTATION
Drawing Title:

ANNEX 2.4: ALTERNATIVE CONSTRUCTION MATERIAL DELIVERY ROUTES

Drawing No.	Revision No.	Rev00
SEV/001SS EIA/ R04-0.01	Date:	11/10/2024
Scale:	(A3) 1:50,000	Checked By:
Drawn By:	E.F.	J.B.
		S.C.





Moyvannan Electricity Substation

Environmental Impact Assessment Report

Annex 3.1: Site Location Plan

Energia Renewables ROI Limited

Galetech Energy Services
Clondargan, Stradone, Co. Cavan Ireland
Telephone +353 (0)49 555 5050
www.galetechenergyservices.com







Moyvannan Electricity Substation

Environmental Impact Assessment Report

Annex 1.5: Scoping Responses

Energia Renewables ROI Limited

Galetech Energy Services

Clondargan, Stradone, Co. Cavan Ireland

Telephone +353 (0)49 555 5050

www.galetechenergyservices.com



Simon Carleton

From: MayoRoscommonLongford.DV <MayoRoscommonLongford.DV@Garda.ie>
Sent: Thursday 29 February 2024 15:31
To: Simon Carleton
Subject: FW: HQCSO_1-54446/21 - correspondence from Simon Carleton - Moyvannan Electricity Substation, Co. Roscommon

Follow Up Flag: Follow up
Flag Status: Completed

MRLDO_12-54446/21
HQCSO_1-54446/21

Mr. Carleton

I am directed by Chief Superintendent McMahon to refer to the above and your recent correspondence in this matter.

Superintendent Fitzgerald, Roscommon Community Engagement reports that having reviewed the attached **Pre-Application Scoping Request** document from **Galetech Energy Services**, An Garda Síochána have no real observations to make, however he requests that when the proposed **Transport & Access Assessment** referred to at **4.10.1** of the attached scoping document has been completed that you might consult with his office at the earliest opportunity.

Superintendent Fitzgerald office email is as follows: MR.Roscommon.CE@Garda.ie

Forwarded for your information, please.

Sent on behalf of Chief Superintendent Ray McMahon,

Shane O'Connor, Sergeant
Divisional Office I The Mall, Castlebar, Co. Mayo F26KC58 I +353 94 9038211 - 0877479966 I
MayoRoscommonLongford.DV@garda.ie I



An Garda Síochána: Ag Coinneáil Daoine Sábháilte – Keeping People Safe

From: Commissioner_NorthWestern <Commissioner_NorthWestern@garda.ie>
Sent: Tuesday 27 February 2024 17:03
To: MayoRoscommonLongford.DV <MayoRoscommonLongford.DV@Garda.ie>
Subject: FW: HQCSO_1-54446/21 - correspondence from Simon Carleton

HQCSO_1-54446/21

Chief Superintendent
Mayo Roscommon Longford

I am directed by Assistant Commissioner North Western Region, to refer to the above and forward the attached correspondence for your information and necessary attention.

Please liaise with Mr. Carleton as deemed necessary at your office in relation to any comments or observations you may have in relation to the proposed development.

Sent on behalf of Assistant Commissioner, North Western Region.

Liam Mccloughlin | HEO Regional Office | Garda North Western Region Headquarters |
| Email liam.mcloughlin@garda.ie | Tel: + 353 (0) 91 337287 | commissioner_northwestern@garda.ie
P Le do thoil, cuimhnigh ar an imshaol roimh priontáil an ríomhphost seo. Please consider the environment before printing this e-mail

From: Corporate.Services <Corporate.Services@garda.ie>
Sent: Tuesday 27 February 2024 16:03
To: Commissioner_NorthWestern <Commissioner_NorthWestern@garda.ie>
Subject: FW: HQCSO_1-54446/21 - correspondence from Simon Carleton

HQCSO_1-54446/21

**Assistant Commissioner,
North Western Region**

Apologies for any inconvenience,

I have attached the appropriate attachment from Simon Carleton to this email.

Regards,

Sent on behalf of Superintendent Corporate Services

██████████ Clerical Officer | Corporate Services | Garda Headquarters, Phoenix Park, Dublin D08 HN3X. |
██████████
████████████████████

From: Commissioner_NorthWestern <Commissioner_NorthWestern@garda.ie>
Sent: Tuesday 27 February 2024 15:31
To: Corporate.Services <Corporate.Services@garda.ie>
Subject: HQCSO_1-54446/21 - correspondence from Simon Carleton

HQCSO_1-54446/21

Superintendent
Corporate Services

I am directed by Assistant Commissioner, North Western Region to refer to the above.

I am to enquire there was an attachment with the email received from Simon Carleton?

Sent on behalf of Assistant Commissioner, NWR

Caroline Jordan, EO

Office of Assistant Commissioner, Garda North Western Region Headquarters | Dublin Road, Renmore, Galway H91 F62K, Ireland. | +353 91 337107. | commissioner_northwestern@garda.ie



An Garda Síochána: Ag Coinneáil Daoine Sábháilte – Keeping People Safe

From: Corporate.Services <Corporate.Services@garda.ie>
Sent: Tuesday 27 February 2024 15:06
To: Commissioner_NorthWestern <Commissioner_NorthWestern@garda.ie>
Subject: FW: HQCSO_1-54446/21

HQCSO_1-54446/21

**Assistant Commissioner,
North Western Region**

Please see below correspondence from Simon Carleton, which is forwarded for your information and consideration.

You are requested to provide a copy of your response to Mr Carleton, to this office for records purposes.

Regards,

Sent on behalf of Superintendent Corporate Services

[REDACTED] | Clerical Officer | Corporate Services | Garda Headquarters, Phoenix Park, Dublin D08 HN3X. |

[REDACTED]

From: Corporate.Services
Sent: Tuesday 27 February 2024 14:56
To: 'Simon Carleton' <simon.carleton@galetechenergy.com>
Subject: HQCSO_1-54446/21

HQCSO_1-54446/21

Dear Simon Carleton

On behalf of the Superintendent, Garda Corporate Services Office, please be advised that your correspondence to the Commissioner on the 27th of February 2024 has been received.

Your correspondence has been forwarded to the office of Assistant Commissioner, North Western Region. The Office of Assistant Commissioner, North Western Region will ensure that you are contacted in due course.

Please contact Assistant Commissioner, North Western Region, An Garda Síochána, Dublin Road, Renmore, Co. Galway, H91 F62K should you have any further queries on this matter (email: Commissioner_NorthWestern@garda.ie)

Sent on behalf of Superintendent D. Butler,
Corporate Services, Garda Headquarters, Dublin D08 HN3X.
Phone: 01-6661253
Email: Corporate.Services@garda.ie

From: Simon Carleton <simon.carleton@galetechenergy.com>
Sent: Tuesday 27 February 2024 14:06
To: Corporate.Services <Corporate.Services@garda.ie>
Subject: Moyvannan Electricity Substation, Co. Roscommon

Good Afternoon,

Please find attached a pre-planning environmental scoping request regarding a proposed electricity substation and ancillary infrastructure at Moyvannan, Co. Roscommon.

Should you have any queries related to the attached, please do not hesitate to contact this office; and we look forward to receipt of any comments you may have in relation to the proposed development.

Kind Regards,
Simon

Simon Carleton
Senior Planner



simon.carleton@galetechenergy.com



+353 (0)86 365 1619 | +353 (0)49 555 5050



Clondargan, Stradone, Co. Cavan, Ireland



www.galetechgroup.com



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Simon Carleton

From: Moran, Susan <Susan.Moran@agriculture.gov.ie>
Sent: Monday 25 March 2024 12:12
To: Simon Carleton
Subject: FW: Moyvannan Electricity Substation, Co. Roscommon

Follow Up Flag: Follow up
Flag Status: Completed

Dear Simon,
Please see below for information.
Kind Regards
Susan

From: EIA Screening <EIAScreening@agriculture.gov.ie>
Sent: Monday, March 25, 2024 11:59 AM
To: Environmental Co-ordination (Inbox) <Environmental_Co-ordination@agriculture.gov.ie>
Subject: RE: Moyvannan Electricity Substation, Co. Roscommon

Hi Breeda,

The Department welcomes the opportunity to provide input to this application. It seems this activity does not fall within the remit of the EIA Regulations under DAFM and therefore, once relevant environmental and planning regulations are met, DAFM has no comment at this stage of the consultation process. However, there is a mention of drainage on agricultural land and in this instance please be cognisant of the requirements of the EIA (Agriculture) Regulations.

Regards,
Michael

From: Environmental Co-ordination (Inbox) <Environmental_Co-ordination@agriculture.gov.ie>
Sent: Wednesday, February 28, 2024 10:43 AM
To: EIA Screening <EIAScreening@agriculture.gov.ie>; Walsh, Ciaran <Ciaran.Walsh@agriculture.gov.ie>; OFahy, Emmet <Emmet.OFahy@agriculture.gov.ie>; Hoffman, Nicholas <Nicholas.Hoffman@agriculture.gov.ie>; Boyce, Catherine <Catherine.Boyce@agriculture.gov.ie>
Subject: FW: Moyvannan Electricity Substation, Co. Roscommon

Good morning,

Please forward any obs/comments you may have on the attached by Wednesday 27th March 2024

Regards

Breeda

Breeda Hennebry
Clerical Officer
Climate Change & Bio-energy Policy Division
An Roinn Talmhaíochta, Bia agus Mara
Department of Agriculture, Food and the Marine
Pailliún A, Páirc Gnó Grattan, Bóthar Átha Cliath, Port Laoise, Co Laoise, R32 K857
Pavillion A, Grattan Business Park, Dublin Road, Portlaoise, Co Laois, R32 K857
T +353 (0)57 8689914

From: Simon Carleton <simon.carleton@galetechenergy.com>
Sent: Tuesday, February 27, 2024 2:15 PM
To: Info <Info@agriculture.gov.ie>; Environmental Co-ordination (Inbox) <Environmental_Coordination@agriculture.gov.ie>
Subject: Moyvannan Electricity Substation, Co. Roscommon

CAUTION: This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to Notify.Cyber@agriculture.gov.ie.

Good Afternoon,

Please find attached a pre-planning environmental scoping request regarding a proposed electricity substation and ancillary infrastructure at Moyvannan, Co. Roscommon.

Should you have any queries related to the attached, please do not hesitate to contact this office; and we look forward to receipt of any comments you may have in relation to the proposed development.

Kind Regards,
Simon

Simon Carleton
Senior Planner

 simon.carleton@galetechenergy.com
 +353 (0)86 365 1619 | +353 (0)49 555 5050
 Clondargan, Stradone, Co. Cavan, Ireland
 www.galetechgroup.com



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Disclaimer:

Department of Agriculture, Food and the Marine

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An Roinn Talmhaíochta, Bia agus Mara

Tá an t-eolas sa ríomhphost seo, agus in aon cheangaltáin leis, faoi rún agus tá sé dírithe ar an

Galetech Energy Services

Clondargan

Stadone

Co Cavan, H12NV06

26TH March 2024

Re: Scoping Request for the proposed electricity substation and ancillary infrastructure at Moyvannan, Co. Roscommon.

Dear Sir/Madam,

The following are the comments from this Division in relation to the proposed development:

If the proposed development will involve the felling or removal of any trees, the developer must obtain a Felling Licence from this Department before trees are felled or removed. A Felling Licence application form can be obtained from **Felling Section, Department of Agriculture, Food and the Marine, Johnstown Castle Estate, Co. Wexford**. Email: felling.forests@agriculture.gov.ie or Web gov.ie - gov.ie - Tree Felling Licences (www.gov.ie)

A Felling Licence granted by the Minister for Agriculture, Food and the Marine provides authority under the Forestry Act 2014 to fell or otherwise remove a tree or trees and/or to thin a forest for silvicultural reasons. The Act prescribes the functions of the Minister and details the requirements, rights and obligations in relation to felling licences. The principal set of regulations giving further effect to the Forestry Act 2014 are the Forestry Regulations 2017 (S.I. No. 191 of 2017).

The developer should take note of the contents of **Felling and Reforestation Policy** document which provide a consolidated source of information on the legal and regulatory framework relating to tree felling; gov.ie - gov.ie - Tree Felling Licences (www.gov.ie) As this development is within forest lands, particular attention should be paid to deforestation, turbulence felling and the requirement to afforest alternative lands.

In order to ensure regulated forestry operations in Ireland accord with the principles of sustainable forest management (SFM), as well fulfilling the requirements of other relevant environmental protection laws, the Department (acting through its Forest Service division) must undertake particular consultations, and give certain matters full consideration during the assessment of individual Felling Licence applications. This includes consultation with relevant bodies, the application of various protocols and procedures (e.g. Forest Service Appropriate Assessment Procedure), and the requirement for applicants on occasion to provide further information (e.g. a Natura Impact Statement).

Consequently, when the Forest Service is considering an application to fell trees, the following applies:

1. The interaction of these proposed works with the environment locally and more widely, in addition to potential direct and indirect impacts on designated sites and water, is assessed. Consultation with relevant environmental and planning authorities may be required where specific sensitivities arise (e.g. local authorities, National Parks & Wildlife Service, Inland Fisheries Ireland, and the National Monuments Service);

2. Where a tree Felling Licence application is received, the Department will publish a notice of the application before making a decision on the matter. The notice shall state that any person may make a submission to the Department within 30 days from the date of the notice. The notices are published online at: [gov.ie - Felling Licence Applications \(www.gov.ie\)](http://gov.ie - Felling Licence Applications (www.gov.ie))
3. Third parties that make a submission or observation will be informed of the decision to grant or refuse the licence, and on request, details of the conditions attached to the licence, the main reasons and considerations on which the decision to grant or refuse the licence was based, and where conditions are attached to any licence, the reasons for the conditions. Both third parties and applicants will be also informed of their right to appeal any decision within 14 days to the Forestry Appeals Committee. Felling Licence decision are published online at: [gov.ie - Felling Licence Decisions \(www.gov.ie\)](http://gov.ie - Felling Licence Decisions (www.gov.ie))

It is important to note that when applying to a **Local Authority**, or **An Bord Pleanála**, for planning permission where developments are:

- a) subject to an EIA procedure (including screening in the case of a sub-threshold development) and any resulting requirement to produce an EIAR; and/or
- b) subject to an Appropriate Assessment procedure (including screening) and any resulting requirement to a Natura Impact Statement (NIS); and
- c) the proposed development in its construction or operational phases, or any works ancillary thereto, would directly or indirectly involve the felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species,
 1. that there is a requirement inter alia under the EIA Directive for an overall assessment of the effects of the project or the alteration thereof on the environment to be undertaken, including the direct and indirect environmental impact of the project;and
 2. pursuant to Article 2(3) of the EIA Directive, the Department of Agriculture, Food and the Marine strongly recommends that, notwithstanding the fact that a parallel consent in the form of felling licence may also have to be applied for, any EIAR and/or NIS produced in connection with the application for planning permission to the Local Planning Authority or An Bord Pleanála, should include an assessment of the impact of and measures, as appropriate, to prevent, mitigate or compensate for any significant adverse effects direct or indirect identified on the environment arising from such felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species.
 3. Please note that there must be absolute spatial consistency between the felling licence areas submitted to DAFM (second authority) and all related planning documents submitted to the first authority in respect of the felling area(s)

Yours sincerely,

Catherine Boyce
Felling Section
Department of Agriculture, Food and the Marine

Johnstown Castle
Co Wexford



Ref: Moyvannan Electricity Substation, Energia Renewables ROI Limited

(Please quote in all related correspondence)

26 March 2024

Galetech Energy Services
Clondargan,
Stradone,
Co. Cavan,
Ireland.
H12 NV06.

Development: proposal to develop grid connection infrastructure associated with the permitted Seven Hills Wind Farm. The proposal is for an 110kv electricity substation and underground electricity cables.

A Chara,

I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations of the Department co-ordinated by the Development Applications Unit under the stated heading:

Underwater Archaeology

It is noted that a number of recorded monuments are proximal to the proposed cable route. Recorded monuments are conferred statutory protection in the Record of Monuments and Places established under section 12 of the National Monuments (Amendment) Act 1994. Waterbodies within the environs of recorded monuments can be considered areas of high underwater cultural heritage potential. Section 3 of the National Monuments (Amendment) Act 1987 is the primary piece of legislation for the protection of underwater cultural heritage, including wrecks over 100 years old and archaeological objects underwater, irrespective of age. Wrecks that are less than 100 years old can also be protected by the 1987 (Amendment) Act. Underwater cultural heritage represented within the proposed development area may also encompass riverine heritage structures and features that lie within the rivers/streams and on their banks.

In light of the potential for the development to have adverse affects on underwater cultural heritage we recommend that a programme of pre-construction underwater archaeological assessment be scoped into the design process. This should include underwater archaeological impact assessment of all/any in-water works that may impact upon underwater cultural heritage. The UAIA should be carried out at the earliest possible stage



to facilitate the embedding of any recommended further mitigation within the detailed design for the project, as necessary, in order to ensure the preservation in-situ of any identified underwater cultural heritage and to develop an informed archaeological strategy to be implemented in agreement with the Department.

Underwater Archaeological Impact Assessment

1. The developer shall commission an Underwater Archaeological Impact Assessment (UAIA) report which shall include the following:
 - a. A desktop assessment that addresses the underwater cultural heritage (including wrecks, archaeological objects, built heritage, riverine heritage and industrial heritage) of the proposed development area. The assessment shall include a full inventory, mapping and survey (photographic, descriptive, photogrammetric, as appropriate) of underwater cultural heritage features and structures and archaeological objects identified by desk study research, fieldwork, cartographic analysis, historical research and prior archaeological investigations.
 - b. The UAIA shall include a licenced dive/wade assessment, accompanied by a hand-held metal detection survey, centred on (but not confined to) any area(s) where works are proposed on the foreshore. The assessment and metal detection survey shall be undertaken by a suitably licenced and experienced underwater archaeologist. All identified underwater cultural heritage shall be surveyed (photographic, descriptive, photogrammetric, as appropriate) in detail as part of the assessment. A Dive/Survey licence (Section 3 1987 National Monuments Act) and Detection Device consent (Section 2 1987 National Monuments Act) will be required for the survey and metal detection, respectively. Licenses should be applied for to the National Monuments Service and should be accompanied by a detailed method statement. Note a period of 3-4 weeks should be allowed to facilitate processing and approval of the licence applications and method statement. All archaeological wading/diving should comply with the Health and Safety Authority's Safety, Health and Welfare at Work (Diving) Regulations 2018/2019.
 - c. Having completed the above-described works, the archaeologist shall submit a final written report to this Department describing the results of the UAIA. The report shall include a comprehensive Archaeological Impact Statement (AIS) that comments on the degree to which the extent, locations and levels of all proposed works (including ground disturbances, foundations, service trenches and other sub-surface works including Site Investigation works) required for the development will impact upon any identified underwater cultural heritage, archaeological materials, objects and/or areas of archaeological potential that have been identified. The AIS should be illustrated with appropriate plans, sections and



photographs that clearly describe any adverse effect(s) of the development on the underwater cultural heritage and proposals for their mitigation. Mitigation may include, in the first instance, the institution of exclusion zones around identified sites to ensure their preservation in situ, recommendations for redesign to allow for full or partial preservation in situ, further wade/dive surveys, test-excavations, excavations ('preservation by record') and/or monitoring, as deemed appropriate. This Department will advise with regard to these matters. No construction works shall commence until after the UAIA has been submitted and reviewed by this Department. All mitigation recommendations will require the agreement of this Department.

Nature Conservation

This Department notes the preliminary EIA scoping report that has been produced by Galetech Energy Services. We recommended that the potential cumulative impacts of the proposed development along with those of the permitted Seven Hills Wind Farm (An Bord Pleanála Ref. ABP-313750-22) and the proposed Eirgrid Athlone to Lanesborough 110 kV line uprate should be evaluated. We further note that the proposed development is in fact part of the infrastructure of the permitted Seven Hills Wind Farm (An Bord Pleanála Ref. ABP-313750-22), that the proposed electricity substation and cables should have formed part of the planning application for the permitted Seven Hills Wind Farm and that the failure to have done so constitutes a lacuna in the planning process for the permitted Seven Hills Wind Farm (as in *O'Grianna & Ors. V. An Bord Pleanála* ([2014] IEHC 632)).

We looking forward to receiving the completed EIAR for our comments.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at referrals@npws.gov.ie, where used, or to the following address:

The Manager
Development Applications Unit (DAU)
Government Offices
Newtown Road
Wexford
Y35 AP90



Is mise, le meas

A handwritten signature in dark ink, appearing to read 'David O'Connor', written in a cursive style.

David O'Connor
Development Applications Unit
Administration



Your Ref: SEV00ISS

Our Ref: **G Pre00085/2024**

(Please quote in all related correspondence)

10 April 2024

Galetech Energy Services
Clondargan
Stradone
Co. Cavan

Via email: simon.carleton@galetechenergy.com

Re: Preplanning Scoping Request for a proposed 110KV Electricity Substation and Underground Electricity Cables approximately 8km northwest of Athlone in the townland of Moyvanann. The grid connection infrastructure is associated with the permitted Seven Hills Wind Farm.

A Chara

I refer to correspondence received in connection with the above.

Further to the underwater archaeological and nature conservation observations/recommendations of the Department issued to you on 25th and 26th March please find below the terrestrial archaeological observations/recommendations of the Department.

The Department recommends that, due to the scale of the proposed development, its effect be assessed by a suitably qualified archaeologist by means of an Archaeological Impact Assessment, comprising a desk study and a site visit.

The archaeologist shall prepare a comprehensive report, including an Archaeological Impact Statement and Mitigation Strategy, to be submitted to the Planning Authority and to the Department.

The assessment report shall specify any archaeological mitigation, (e.g. avoidance, archaeological excavation or monitoring of groundworks) that might be required to ensure that archaeological features are not destroyed or damaged by the proposed development.

The assessment report shall be submitted as a supporting document with any future planning application. This will enable the Department and the Planning Authority to formulate an informed archaeological recommendation before a planning decision is taken.



The above observations/recommendations are based on the papers submitted to this Department on a pre-planning basis and are made without prejudice to any observations that the Minister may make in the context of any consultation arising on foot of any development application referred to the Minister, by the planning authority, in his role as statutory consultee under the Planning and Development Act, 2000, as amended.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at manager.dau@npws.gov.ie, or to the following address:

The Manager
Development Applications Unit (DAU)
Government Offices
Newtown Road
Wexford
Y35 AP90

Is mise, le meas

A handwritten signature in blue ink, appearing to read 'Sinéad O'Brien'.

Sinéad O' Brien
Development Applications Unit
Administration

Simon Carleton

Subject: Moyvannan Electricity Substation, Co. Roscommon

From: John Bagnall <john.bagnall@eir.ie>
Sent: Thursday, February 29, 2024 11:53 AM
To: Simon Carleton <simon.carleton@galetechenergy.com>
Cc: mobilenetworkstxn@eir.ie
Subject: Re: Moyvannan Electricity Substation, Co. Roscommon

Hi Simon,

We have no transmission links within the proposed area and it has no risk to the network. Best of luck with the development.

Kind regards,



John Bagnall
Wireless Transmission Engineer

M: +353 85 1053746
E: john.bagnall@eir.ie
Address: EirCode - D08 Y42N

From: Simon Carleton
Sent: Tuesday, February 27, 2024 2:19 PM
To: mobilenetworkstxn@eir.ie; john.bagnall@eir.ie
Subject: Moyvannan Electricity Substation, Co. Roscommon

Good Afternoon,

Please find attached a pre-planning environmental scoping request regarding a proposed electricity substation and ancillary infrastructure at Moyvannan, Co. Roscommon.

Should you have any queries related to the attached, please do not hesitate to contact this office; and we look forward to receipt of any comments you may have in relation to the proposed development.

Kind Regards,

Simon

Simon Carleton

Senior Planner



simon.carleton@galetechenergy.com



+353 (0)86 365 1619 | +353 (0)49 555 5050



Clondargan, Stradone, Co. Cavan, Ireland



www.galetechgroup.com



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Simon Carleton

From: Info - EirGrid <Info@Eirgrid.com>
Sent: Tuesday 27 February 2024 14:39
To: Simon Carleton
Cc: Info - EirGrid
Subject: RE: Moyvannan Electricity Substation, Co. Roscommon

Follow Up Flag: Follow up
Flag Status: Completed

Simon,

Current practice in EirGrid, given the imperative to expedite generator applications, is not to comment on EIA scoping reports

Kind regards,

Customers & Connections

[EirGrid.com](https://eirgrid.com)



From: Simon Carleton <simon.carleton@galetechenergy.com>
Sent: Tuesday, February 27, 2024 2:19 PM
To: Info - EirGrid <Info@Eirgrid.com>
Subject: Moyvannan Electricity Substation, Co. Roscommon

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Good Afternoon,

Please find attached a pre-planning environmental scoping request regarding a proposed electricity substation and ancillary infrastructure at Moyvannan, Co. Roscommon.

Should you have any queries related to the attached, please do not hesitate to contact this office; and we look forward to receipt of any comments you may have in relation to the proposed development.

Kind Regards,
Simon

Simon Carleton
Senior Planner



simon.carleton@galetechenergy.com



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Simon Carleton

Subject: Moyvannan Electricity Substation, Co. Roscommon

From: Peter O'Brien <peter.obrien@enet.ie>
Sent: Tuesday, February 27, 2024 3:55 PM
To: Simon Carleton <simon.carleton@galetechenergy.com>
Subject: RE: Moyvannan Electricity Substation, Co. Roscommon

Thanks Simon,

This wont affect our current network,

Best Regards,
Peter

Peter O'Brien | Licensed Link planner

A: Enet House, National Technology Park, Castletroy, Co Limerick, V946P52

M: +353867744313 | **W:** www.enet.ie



Connectivity Everywhere

Registered in Ireland, Registration No. 332982

Registered Offices: Enet House, National Technology Park, Castletroy, Co Limerick, V94 6P52

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From: Simon Carleton <simon.carleton@galetechenergy.com>

Sent: Tuesday, February 27, 2024 3:51 PM

To: Peter O'Brien <peter.obrien@enet.ie>

Subject: RE: Moyvannan Electricity Substation, Co. Roscommon

You don't often get email from simon.carleton@galetechenergy.com. [Learn why this is important](#)

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Hi Peter,

The substation is at E597015 N748535 (ITM). In terms of structures, there will be a number (up to 5 no.) of lightning masts of up to 18m in height within the substation compound; and two (2 no.) electricity masts of up to 15m in height installed beneath an existing overhead electricity transmission line immediately northeast of the substation compound.

Kind Regards,
Simon

Simon Carleton
Senior Planner

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From: Peter O'Brien <peter.obrien@enet.ie>
Sent: Tuesday, February 27, 2024 3:45 PM
To: Simon Carleton <simon.carleton@galetechenergy.com>
Subject: RE: Moyvannan Electricity Substation, Co. Roscommon

Hi Simon,

Could you send me the coordinates of the substation?

Regards,
Peter

Peter O'Brien | Licensed Link planner
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M: +353867744313 | **W:** www.enet.ie



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Registered Offices: Enet House, National Technology Park, Castletroy, Co Limerick, V94 6P52
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From: Simon Carleton
Sent: Tuesday, February 27, 2024 2:24 PM

To: peter.obrien@enet.ie

Subject: Moyvannan Electricity Substation, Co. Roscommon

Good Afternoon,

Please find attached a pre-planning environmental scoping request regarding a proposed electricity substation and ancillary infrastructure at Moyvannan, Co. Roscommon.

Should you have any queries related to the attached, please do not hesitate to contact this office; and we look forward to receipt of any comments you may have in relation to the proposed development.

Kind Regards,
Simon

Simon Carleton
Senior Planner



simon.carleton@galetechenergy.com



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Simon Carleton

Subject: Moyvannan Electricity Substation, Co. Roscommon

Hello Simon,

Thank you for your emails and a pre-planning environmental scoping request regarding a proposed electricity substation and ancillary infrastructure at Moyvannan, Co. Roscommon.

Please see attached a copy of Fáilte Ireland's Guidelines for the Treatment of Tourism in an EIA, which you may find informative for the preparation of the Environmental Impact Assessment for the proposed project. The purpose of this report is to provide guidance for those conducting Environmental Impact Assessment and compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism. These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines outlined in section 2.

Regards,

Yvonne

Yvonne Jackson

Product Development-Environment & Planning Support | Fáilte Ireland

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From: Simon Carleton

Sent: Tuesday, February 27, 2024 2:22 PM

To: 'planning.applications@failteireland.ie' <planning.applications@failteireland.ie>

Subject: Moyvannan Electricity Substation, Co. Roscommon

Good Afternoon,

Please find attached a pre-planning environmental scoping request regarding a proposed electricity substation and ancillary infrastructure at Moyvannan, Co. Roscommon.

Should you have any queries related to the attached, please do not hesitate to contact this office; and we look forward to receipt of any comments you may have in relation to the proposed development.

Kind Regards,
Simon

EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects



July 2023

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1. Introduction

Tourism is a growing sector and substantial part of the Irish Economy. It contributes to both urban and rural economies in every part of the country. The impact and interaction of tourism with the environment is complex and the assessment of environmental impacts is of utmost importance to creating a sustainable tourism economy and protecting the natural resources that are so often a tourism attraction.

The purpose of this report is to provide guidance for those conducting Environmental Impact Assessment and compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism. These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines outlined in section 2.

This guidance document has been prepared by Fáilte Ireland to update their EIA guidelines in line with changes in legislative and guidance requirements.

2. Background to this Document

Tourism is one of the largest and most important sectors of the economy, providing employment for approximately **260,000 people**, an economic contribution of **€9.5 billion**, and exchequer revenue of **€1.8 billion** in 2019, which helps fund other key public services.

In 2019 Ireland welcomed **9.7 million overseas visitors**.

Fáilte Ireland is the National Tourism Development Authority established by the Irish Government in May 2003. Fáilte Ireland's role is to support the tourism industry and work to sustain Ireland as a high-quality and competitive tourism destination. They provide a range of practical business supports to help tourism businesses better manage and market their products and services.

Fáilte Ireland also work with other state agencies and representative bodies, at local and national levels, to implement and champion positive and practical strategies that will benefit Irish tourism and the Irish economy.

Fáilte Ireland promotes Ireland as a holiday destination through a domestic marketing campaign (DiscoverIreland.ie) and manage a network of nationwide tourist information centres that provide help and advice for visitors to Ireland.

Tourism related projects cover a broad range of plans, programmes and developments, from the Wild Atlantic Way to a single hotel conversion. These guidelines apply to projects involving or impacting upon tourism. A tourism plan, strategy or programme where it is part of the statutory plan making process under the Planning and Development Acts (as amended), may be more appropriately assessed by a Strategic Environmental Assessment (SEA) as discussed in the next section.

It should be borne in mind that EIA is required where there is anticipated to be a significant impact on the environment, where tourism projects are of a prescribed type or meet thresholds identified below.

Where Natura 2000 Designated Sites are potentially affected by tourism development Appropriate Assessment must be carried out by the appropriate authority in accordance with Article 6(3) of the EU Habitats Directive.

3. Legislation and Statutory Guidance

Environmental Impact Assessment is a procedure that ensures that the environmental implications of decisions are taken into account before planning based decisions are made. The assessment results in a report, called an Environmental Impact Assessment Report (EIAR).

Legislation

These guidelines are produced under current EIAR legislative requirements, having regard to Directive 2011/92/EU (known as 'Environmental Impact Assessment' – EIA Directive), as amended by Directive EU 2014/52 which came into effect in May of 2017. These requirements were transposed into Irish Law on 1 September 2018 as most of the provisions of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) came into effect. The principle of both Directives is to ensure that plans, programmes and projects likely to have significant effects on the environment are made subject to an environmental assessment, prior to their approval or authorisation.

Statutory Guidance

In response to the changes to the EIAR requirements under Directive EU 2014/52, the Environmental Protection Agency (EPA) developed Guidelines on the information to be contained in Environmental Impact Assessment Reports in May 2022. The Guidelines are a statutory document to be regarded by those preparing EIARs and the decision makers considering the EIARs.

Some of the key changes to the EIA Directive introduced by Directive 2014/52/EU are as follows:

- Additional information to be provided in the project description to describe the location of the project, the technologies and substances used, the construction of the project and required demolition;
- The requirement for consideration of alternatives has changed from a requirement to provide 'An outline of the main alternatives studied by the developer and an indication of the main reasons for this choice, taking into account the environmental effects' to 'a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment';
- A refinement of the environmental factors to be considered in the assessment with an increased focus on resource efficiency, climate change, biodiversity and disaster prevention;
- Changes to Prescribed Environmental Factors with 'Land' being added, 'Human Beings' replaced by 'Population & Human Health' and 'Flora & Fauna' replaced by 'Biodiversity';

- The developer is required to have competent experts to prepare the EIAR and the Board is required to have access to sufficient expertise to assess the EIAR;
- Requirement for the incorporation of mitigation and monitoring measures in consents and ensuring that developers deliver these measures;
- The requirements for the assessment of cumulative effects with existing and/or approved projects, taking into account existing environmental issues to be considered; and
- Reasoned decisions made with regard to the EIA outcomes must be provided.

In addition to the EPA statutory guidance, the Department of Housing has produced Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment in August 2018.

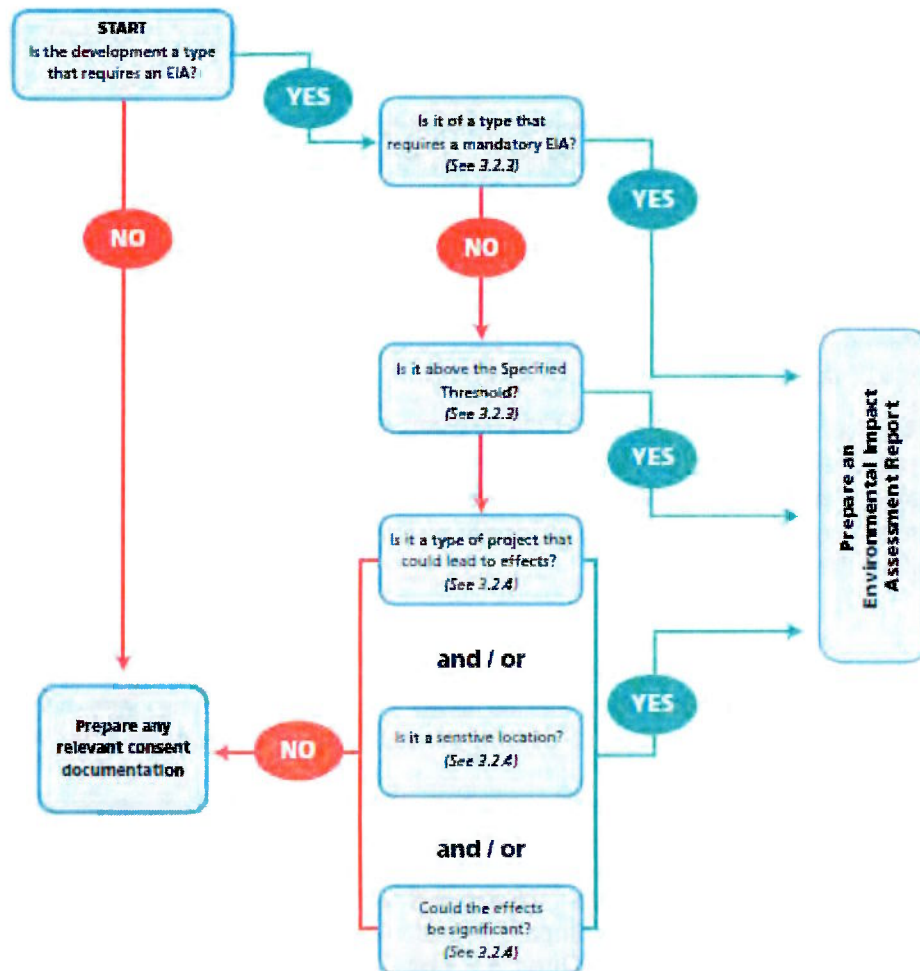
The process of EIA is set out in the EPA EIAR Guidelines, this document should be read in conjunction with and used as supplementary guidance to the EPA EIAR Guidelines. The process for ascertaining whether an EIAR is required is known as 'screening' and the process to determine the breadth and scope of an EIAR is known as 'scoping'. Guidance on this can be found in Section 3.2 of the EPA Guidelines.

Screening

Through EIA Screening, developments are either considered as requiring an EIAR due to the project type or because they exceed a threshold level. The screening process begins by establishing whether the proposal is a 'project' as understood by the Directive (as amended).

The prescribed development types and thresholds are set out in Annex I and II of the EIA Directive as transposed into Schedule 5 of the Planning and Development Regulations 2010-2018 (as amended). Development which does not exceed these thresholds but may require an EIAR are called sub threshold. Sub-Threshold considerations are outlined in Schedule 7 of European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) as transposed from Annex III of the Directive. The Guidelines on Environmental Impact Assessment Reports note that projects at first glance may not appear to come under the Schedule but on closer examination when the process is further examined, they may do so because of the sensitivity or significance of the receiving environment etc. Sub threshold developments require an EIAR if they are likely to have significant environmental impacts and must undergo assessment for likely significant impacts through an EIAR screening report. The contents of a screening report for subthreshold development are contained in Annex III of the EIA Directive.

Figure 1: EIAR Screening Process



(Taken from Fig 3.2 of the EPA Guidelines)

Tourism locations should be identified as sensitive receptors in screening assessments for particular impacts, depending on scale and sensitivity, as they would in a full EIAR. Section 6 below can act as guidance for Screening Reports as well as for full EIAR.

The screening process for considering where an EIAR is necessary, is summarised above in Figure 1 (excerpted from Figure 3.2 of the EPA Guidelines).

Strategic Environmental Assessment (SEA) is a more strategic level of environmental assessment that examines plans, policies, objectives and programmes specifically rather than projects. For some tourism developments it may be more appropriate that they be examined through SEA, while individual projects or specific proposals are likely to be more assessed through EIAR. If a project is part of a plan, programme or policy/objective assessed by SEA there may still be a requirement for an EIAR for that development (subject to EIA Screening assessment).

EIAR Scoping

Scoping an EIAR is an opportunity to look at the breadth of issues and ensure that any areas of possible significant impact are assessed. Identifying sensitivities and stakeholders should take account of tourism facilities and consider Fáilte Ireland in scoping requests where necessary.

4. Assessing Tourism

There is no legal definition of 'tourism' in Irish legislation. The UNWTO definition of sustainable tourism is *"Tourism that takes full account of its current and future economic, social and environmental impacts, addressing the needs of visitors, the industry, the environment and host communities"*. This is widely accepted as a key definition of tourism as we move to a more sustainable future.

Tourism assessments are frequently carried out by economic consultants and by specific tourism consultants. It is always advisable, particular for tourism projects, that suitably qualified and experienced personnel are used to determine the impact of tourism related projects or to assess the impact of more general proposals on a tourism asset identified in a particular location. There is a requirement for EIAR under current legislation to contain a statement of competency within all EIAR documents, including screening and scoping reports.

Projects which involve a tourism element

Tourism projects are wide ranging and diverse. While there are some projects which cater to tourism and are easily identified as such - Hotels, Museums, etc. there are other projects where tourism is a key service or element, but which may not be immediately obvious – walking/cycling/forest trails, greenways, blueways, community facilities and others. EIAR conducted for developments containing tourist elements should be completed in accordance with the current guidance from the EPA.

Projects which include a tourism element can have potential for particular environmental effects which differ from a non-tourism development. These impacts can be intermittent, event related, inconsistent, dependent on weather, temporal, temporary or seasonal. This is considered within the prescribed environmental topics for EIAR outlined in Section 7 below.

Projects which may have an impact upon tourism

While tourism projects may be diverse, the projects which can impact tourism are considerably more wide ranging, from large infrastructural developments to local energy developments. Disruption to or suppression of a tourist resource or amenity can have very local or more strategic impacts, directly or indirectly- for example energy projects in a rural area can have both a negative and positive impact in different regards. There can be temporary, periodic or even seasonal impacts occurring during construction or operational periods.

According to the Fáilte Ireland Tourism Facts 2019 Report, the most important factors in determining the attractiveness of tourism destinations for visitors to Ireland are;

- Beautiful Scenery and Unspoiled Environment
- Hospitality
- Safety
- Nature, Wildlife and Natural Attractions
- History and Culture

- Pace of Life

These factors used for the promotion of tourism in Ireland are also barometers of sensitivity to change in tourism sensitive or dominant locations where development may have an impact upon the tourism asset. The potential for development to impact these sensitivities, and the environmental criteria under which they can be considered, are identified in section 7 of the guidelines.

5. Guiding Principles of EIAR

As outlined in the EPA EIAR Guidelines, the fundamental principles to be followed when preparing an EIAR, including screening and scoping, are:

- Anticipating, avoiding and reducing significant effects
- Assessing and mitigating effects
- Maintaining objectivity
- Ensuring clarity and quality
- Providing relevant information to decision makers
- Facilitating better consultation.

Environmental assessment should be undertaken in accordance with the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018.

6. Consideration of Competency and Qualifications

As per Section 2.5 of the EPA Guidelines, EIAR is required to be completed by '*competent experts*'.

Contributors to the preparation of environmental impact assessment reports, including screening and scoping assessments, should be qualified and competent. Sufficient expertise, in the relevant field of the project concerned, is required for the purpose of its examination by the competent authorities in order to ensure that the information provided by the developer is complete and of a high level of quality so that a full and proper assessment can be undertaken.

For tourism related projects, or projects likely to affect tourism assets, competent experts in the area of tourism should be utilised in the environmental assessment.

The competency of all involved in the production of an EIAR or any related report (e.g. Screening and scoping) is required to be stated at the beginning of the EIAR report with further details as necessary in each following chapter.

Where tourism projects involve for example heritage or cultural components, input from heritage consultants, conservation architects, or historians may be required.

7. EIAR Requirements

The following are the key requirements for an EIAR under the current guidance. This is not a definitive list and should be read in conjunction with regulations.

- project description;
- assessment of alternatives considered;
- baseline assessment;
- assessment of effects;
- cumulative impact;
- interaction of impacts;
- mitigation & monitoring; and
- residual impacts

Project Description

Project descriptions are required to describe the whole project including site, scale, design and key factors. It is important that the EIAR and design team have a consistent understanding of the development description in full. The key requirements are outlined in section 3.5 of the EPA Guidelines however they identify the following;

- the location of the project
- the physical characteristics of the whole project
- the main characteristics of the operational phase of the project
- an estimate, by type and quantity, of the expected residues and emissions

The location of the project should include identifying key sensitive receptors (including tourism receptors). In the operational phase of the project any tourism based, or potentially tourism related activity, should be identified.

Assessment of Alternatives

The assessment of the various reasonable alternatives is an important requirement of the EIA process.

Where tourism projects are location dependent the assessment of reasonable alternatives should consider alternative methods, layouts, technologies and mitigations, detail the key considerations culminating in the selection of the option/design, the reasoning for these and the environmental effect of these decisions. This is particularly important for tourism projects which are often location tied. The EPA EIAR Guidelines indicate that it is generally sufficient to provide a broad description of each main alternatives and the key issues associated with each, showing how environmental considerations were taken into account in deciding on the selected option.

Baseline Assessment

Baseline descriptions are evidence based, current descriptions of environmental characteristics with consideration of likely changes to the baseline environment evidenced in planning histories, unimplemented permissions, and applications pending determination. Baseline assessments should identify any tourism sensitivities in the zone of influence of a development. This zone of influence of a development is highly dependent on its **Context, Character, Significance, and Sensitivity**, as outlined in the EPA EIAR Guidelines. These characteristics apply to both the development and the environment.

For example, in a tourism context;

The location of sensitive tourism resources that are likely to be directly affected should be highlighted, and other premises which although located elsewhere, may be the subject of in combination impacts such as alteration of traffic flows or increased urban development.

The character of an area from a tourism perspective should be described and the principal types of tourism in the area. Where relevant, the specific environmental resources or attributes in the existing environment which each group uses or values should be stated and where relevant, indicate the time, duration or seasonality of any of those activities.

The significance of the tourism assets or activities likely to be affected should be highlighted. Reference to any existing formal or published designation or recognition of such significance should be included. Where possible the value of the contribution of such tourism assets and activities to the local economy should also be provided.

If there are any significant concerns or opposition to the development known to exist among tourism stakeholders and interest groups, this should be highlighted. Identify, where possible, the particular aspect of the development which is of concern, together with the part of the existing tourism resource which may be threatened or impacted.

In addition, the baseline should include any methodologies employed in the study to obtain information, if particular databases are used to locate sensitive receptors they should be acknowledged. In relation to tourism information, the suggested information sources at the end of this document are a non-exhaustive list which may be of assistance in identifying tourism receptors.

Impact Assessment

The topics for consideration of impact are prescribed in the EIA Directive and transcribed into Irish law by the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018). Impact assessment should contain the likely significant effects of a development arising from both construction and operation of a development. Advice on describing the effects is contained within the EPA EIAR Guidelines and includes the **quality, significance, extent, probability, type** and **duration** of the effect, with particular descriptors for each. In describing effects upon tourism receptors these descriptors should take account of the particular aspects and sensitivities of tourism, for example a temporary annual effect from a development may have different impacts upon tourism if it falls at peak season rather than off-peak.

Impact assessment should be carried out as per EPA guidelines and the best practice for that prescribed topic. It may be considered appropriate to consider impact on tourism under the 'Population and Human Health' and / or 'Landscape' topics as suggested below.

Population and Human Health

The consideration of tourism projects within the Population and Human Health is extensive, with impacts ranging from rural employment population impacts of seasonal tourism, to the health impact of air pollution from increased traffic in urban areas.

The impact upon tourism can be considered within this section through the sensitivities of Hospitality, Safety and Pace of Life. Changes in population can impact the perception of pace of life or safety in a particular location. Impacts upon these issues in areas which rely heavily on tourism or have a particular sensitive tourism generator should be considered in this section. The EPA guidelines makes reference to amenity "*..which may be relevant under 'Population and Human Health' and 'Landscape'.*"

Biodiversity

Particular tourist activities can have a significant impact upon biodiversity. Landscapes which are 'unspoiled' can be attractors of tourism. However, the disturbance to ecology must be managed to minimise impacts.

Biodiversity is also a tourism asset and should be protected as such from other development and should be provided for in proposals where possible.

The assessment should also consider current Government policy on nature conservation as outlined in the National Biodiversity Action Plan 2017-2021 (NBAP) (and subsequent iterations (Including draft NBAP recently open for public consultation, to cover 2023 to 2027) which also includes Ireland's vision for biodiversity below.

'That biodiversity and ecosystems in Ireland are conserved and restored, delivering benefits essential for all sectors of society and that Ireland contributes to efforts to halt the loss of biodiversity and the degradation of ecosystems in the EU and globally.'

Land, Soils and Geology

A link between tourism and this prescribed environmental factor, beyond the normal development impacts, is rare, however particular activities or facilities which use geological features may have an impact upon soils and geology, such as mountain biking trails, recreational uses of old quarries etc.

The impact upon Geotourism related to geoheritage within the natural environment, e.g., any impacts on UNESCO Global Geoparks, of which we currently have three on the island of Ireland; Copper Coast in Co. Waterford, Burren and Cliffs of Moher in Co. Clare, and Cuilcagh Lakelands in Cavan and Fermanagh should be considered (where applicable) in this section.

Indirect impacts such as material use for extensive landscaping and public realm should also be considered.

Water

Tourism uses can be water intense, depending on development type. Recreational use of a surface water feature, water-based leisure centres etc have different impacts to standard development.

Air Quality and Climate

Tourism impact upon air quality is dependent on the activity proposed and sensitivity of the location. If the tourism project includes a large increase in transportation services, collection of baseline air emission data is advised. Transportation emissions affect not only air quality, but also greenhouse gases. Changing climatic patterns due to climate change should be factored into this analysis.

Noise and Vibration

A link between tourism and this prescribed environmental factor, beyond the normal development impacts, is rare, however the impact upon tourism of issues of noise and vibration can be significant. Construction adjoining hotels for example should consider the sensitivity of the development and ensure mitigation is in place.

Material Assets; Traffic and Transport

The different transport patterns associated with tourism activities is a key impact of tourism and should be considered especially for tourism projects. These produce temporal and seasonal changes on the norm and specialist consideration and interpretation should be given. Tourism proposals should, where possible, be well served by public transport and should be accessible by modes other than the car. The impact of traffic on tourism assets can be substantial and can vary in severity according to season, the weather, etc. The impact of construction traffic can be a particular concern in tourism sensitive areas in terms of noise pollution and visual impact. The construction programme of developments should work to

avoid peak tourism periods in tourism areas and should consider planned or anticipated tourism events and festivals.

Cultural Heritage

Cultural heritage can be a key component of tourism projects and the impact of tourism on the maintenance of cultural heritage should be given the utmost consideration, whether positive or negative. As a tourism attraction, cultural heritage should be strongly considered in non-tourism developments and the impact upon tourism considered as a potential impact.

Archaeology

Archaeology can be of tourism interest and can be an attractive or key component of tourism projects. Archaeology can be a tourism attractor and given that national policy emphasis on the non-renewable nature of the archaeology and archaeological heritage, focus should be a presumption in favour of its preservation in-situ or where preservation in-situ is not the option chosen, there must be preservation by record (i.e. archaeological excavation and recording must take place) in line with statutory requirements.

Material Assets; Waste Management

Tourism is a resource heavy activity and can impact waste streams and waste segregation. Impacts here should be considered strongly and with knowledge of the variation that arises from the particular tourist activity. Waste and Waste disposal issues can also impact the perception of an unspoiled environment, effecting tourism, which should be considered.

Material Assets

Material assets outside of the material assets already referenced that should be considered are built services (utilities) and infrastructure. Tourism development should include impact assessment on built services (utilities) and infrastructure while non tourism related development should consider the effect on tourism, which should be considered.

Landscape

The visual impact of a tourism development, especially in locations which are visually sensitive or renowned for their scenic or landscape beauty, should be considered carefully. A development intended to utilise or enjoy a particular vista or environment should minimise impact upon that environment.

Major Accident and Natural Disaster

There is a requirement for tourist developments to describe expected significant effects on the environment of the proposed development's vulnerability to major accidents and/or natural disasters relevant to it. Where appropriate measures should be identified to prevent or mitigate the significant adverse effects of such accidents or disasters, including resulting from climate change, on the environment and detail the preparedness for the proposed response.

Interaction of Impacts

Where two or more environmental impacts combine or interact they should be considered under the prescribed topics. It is best practice to provide a table of interactions within an EIAR or EIA Screening Report.

Cumulative Impact

The cumulative impact is that of the project combined with any known likely project which will interact or compound an environmental impact.

Transboundary Impact

Transboundary impacts should be included in EIAR. In the case of tourism, especially international travel, the transboundary impacts may not be proximate to the EIAR site.

Mitigation & Monitoring

Mitigation should follow the hierarchy of minimisation in descending order of preference- Avoid, Reduce, Remedy.

Avoid sensitive tourism resources- such as views, access and amenity areas including habitats as well as historical or cultural sites and structures.

Reduce the exposure of sensitive resources to excessive environmental impact.

Reduce the adverse effects to tourism land uses and patterns of activities, especially through interactions arising from significant changes in the intensity of use or contrasts of character or appearance.

Remedy any unavoidable significant residual adverse effects on tourism resources or activities.

Mitigation measures must be measurable and achievable within the bounds of the project.

With regard to Monitoring, Article 8a of the EIA Directive requires that:

1. 'The decision to grant development consent shall incorporate at least the following information ...

(b) any environmental conditions attached to the decision, a description of any features of the project and/or measures envisaged to avoid, prevent or reduce and, if possible, offset significant adverse effects on the environment as well as, where appropriate, monitoring measures. ... 4 Member States shall ensure that the features of the project and/or measures envisaged to avoid, prevent or reduce and, if possible, offset significant adverse effects on the environment are implemented by the developer, and shall determine the procedures regarding the monitoring of significant adverse effects on the environment. The type of parameters to be monitored and the duration of the monitoring shall be proportionate to the nature, location and size of the project and the significance of its effects on the environment. Existing monitoring arrangements resulting from Union legislation other than this Directive and from national legislation may be used if appropriate, with a view to avoiding duplication of monitoring.'

Residual Impacts

The residual impacts are the final predicted or intended impacts which occur after the proposed mitigation measures have been implemented.

8. Sources of information on Tourism

Information available online

Fáilte Ireland

Fáilte Ireland offers detailed research analysis and insights into the Irish Tourism Industry. The National Tourism Development Authority has a portfolio of research across a number of areas including facts and figures, Environmental Surveying and Monitoring, briefing papers and reports and visitor feedback. The Fáilte Ireland website has a dedicated research library which can be accessed [here](#)

Fáilte Ireland also manages an environmental surveying and monitoring database as part of the Wild Atlantic Way Operational Programme which can be accessed [here](#). The purpose of this is to work with and demonstrate to our stakeholders and partners that we are committed to the sustainable development of the Wild Atlantic Way, and to be able to pre-empt and avoid environmental effects in the future should they occur.

Discover Ireland:

Operated by Fáilte Ireland, the Discover Ireland website includes comprehensive information on tourist attractions in destinations all around Ireland, including listings for activities, accommodation, events and experiences for every county, major town and region in Ireland. The website features elements from the four destination brands – Wild Atlantic Way, Ireland's Ancient East, Ireland's Hidden Heartlands and Visit Dublin and can be accessed [here](#).

Tourism Ireland

Tourism Ireland is responsible for marketing the island of Ireland overseas as a holiday and business tourism destination. Tourism Ireland publishes a range of research documents including; visitor facts and figures, seasonal updates and industry insights which are accessible [here](#)

Local Authorities

Local Authorities are an invaluable source of information. They produce tourism strategies and audits of tourism assets within their jurisdiction. Local authorities will also produce landscape and seascape studies. Protected views and prospects as well as the record of protected structures and other designated protected buildings are contained within the Statutory Development Plans.

Regional Assemblies

Regional Assemblies can also be consulted on high level strategic tourism and potential Regional Spatial and Economic Strategies (RSEs) should be consulted.

Central Statistics Office

The Central Statistics Office (CSO) is Ireland's national statistical office and their purpose is to impartially collect, analyse and make available statistics about Ireland's people, society and economy. The Tourism and Travel Section of the Central Statistics Office is the major source for tourism statistics in Ireland and is updated regularly.

Simon Carleton

Subject: FW: Moyvannan Electricity Substation, Co. Roscommon

Kind Regards,
Simon

Simon Carleton
Senior Planner



simon.carleton@galetechenergy.com



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From: DIG <Dig@gasnetworks.ie>
Sent: Wednesday, February 28, 2024 8:03 AM
To: Simon Carleton <simon.carleton@galetechenergy.com>
Subject: RE: Moyvannan Electricity Substation, Co. Roscommon

Thank you for your enquiry to the Gas Networks Ireland **Dial Before You Dig** service.

Gas Networks Ireland has **No recorded Gas Network** within your area of interest.

Before you start work, you must have a current gas network map (or maps) for the work location. A **current gas network map** (or maps) must always be kept on site while work is under way.

The Gas Network

For an overview of the existing Gas Network, please refer to the Gas Networks Ireland safety booklet, **Safety advice for working in the vicinity of natural gas pipelines**, available at <https://www.gasnetworks.ie/home/safety/dial-before-you-dig/>

Reading your Map

- High pressure transmission gas pipe is shown **Red**.
- Medium pressure distribution gas pipe is shown **Blue**.
- Low Pressure distribution gas pipe is shown **Green**.

The gas network map is indicative only. You must conform to the safety and legal notices printed on the map. For further information on reading this map refer to the [Safety Information](#) below.

Breaking Ground

- Supervision by Gas Networks Ireland is **not** required when working in the vicinity of Distribution gas pipes (unless noted otherwise). Safe digging practices **must** be followed. All work in the vicinity of a gas transmission pipeline **must** be carried out in compliance with:
 - Health and Safety Authority, [Code of Practice for Avoiding Danger from Underground Services](#).

Critical Activity

Quarrying or blasting must not be carried out within 400 m of the gas network until Gas Networks Ireland has been consulted on **1800 42 77 47**

Aurora Telecom

- Part of the Aurora Telecom Network may be present on your network map. For further information, Aurora can be contacted on **01 892 6166** (Office Hours) or auroralink@gasnetworks.ie.

Safety Information

- Before starting work any work in the vicinity of the gas network, please refer to the Gas Networks Ireland safety booklet, [Safety advice for working in the vicinity of natural gas pipelines](#), available at <https://www.gasnetworks.ie/home/safety/dial-before-you-dig/>

This booklet contains important safety information, including advice on how to read the gas network maps you have requested.

If you did not request this map, please contact Customer Service on **1800 200 694**.

Thank you for your enquiry to Gas Networks Ireland.

T 1800 20 50 50 (Emergency)

T 1800 42 77 47 (Dial Before You Dig enquiries)

E dig@gasnetworks.ie

Gas Networks Ireland Networks Services Centre, St. Margaret's Road, Finglas, D11 Y895 [gasnetworks.ie](https://www.gasnetworks.ie) | Find us on [Twitter](#)



**Gas
Networks
Ireland**

Useful Publications

- Health and Safety Authority, [Code of Practice for Avoiding Danger from Underground Services](#)
- Health and Safety Authority, [Guide to Safety in Excavations](#)

Both are available free of charge from: Health and Safety Authority on **0818 289 389** www.hsa.ie

From: Simon Carleton
Sent: Tuesday, February 27, 2024 2:24 PM
To: networkinfo@gasnetworks.ie
Subject: Moyvannan Electricity Substation, Co. Roscommon

Good Afternoon,

Please find attached a pre-planning environmental scoping request regarding a proposed electricity substation and ancillary infrastructure at Moyvannan, Co. Roscommon.

Should you have any queries related to the attached, please do not hesitate to contact this office; and we look forward to receipt of any comments you may have in relation to the proposed development.

Kind Regards,
Simon

Simon Carleton
Senior Planner

 simon.carleton@galetechenergy.com
 +353 (0)86 365 1619 | +353 (0)49 555 5050
 Clondargan, Stradone, Co. Cavan, Ireland
 www.galetechgroup.com



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Tá an fhaisnéis á seachadadh dírithe ar an duine nó ar an eintiteas chuig a bhfuil sí seolta amháin agus féadfar ábhar faoi rún, faoi phribhléid nó ábhar atá íogair ó thaobh tráchtála de a bheith mar chuid de. Tá aon athsheachadadh nó scaipeadh den fhaisnéis, aon athbhreithniú ar nó aon úsáid eile a bhaint as, nó aon ghníomh a dhéantar ag brath ar an bhfaisnéis seo ag daoine nó ag eintitis nach dóibh siúd an fhaisnéis seo, toirimisceithe agus féadfar é a bheith neamhdhleathach. Níl Líonraí Gáis Éireann faoi dhliteanas maidir le seachadadh iomlán agus ceart na faisnéise sa chumarsáid seo nó maidir le haon mhoill a bhaineann léi. Ní ghlacann Líonraí Gáis Éireann le haon dliteanas faoi ghníomh nó faoi iarmhairtí bunaithe ar úsáid thoirmisceithe na faisnéise seo. Níl Líonraí Gáis Éireann faoi dhliteanas maidir le seachadadh ceart agus iomlán na faisnéise sa chumarsáid seo nó maidir le haon mhoill a bhaineann léi. Má fuair tú an teachtaireacht seo in earráid, más é do thoil é, déan teagmháil leis an seoltóir agus scríos an t-ábhar ó gach aon ríomhaire.

Féadfar ríomhphost a bheith soghabhálach i leith truaillithe, idircheaptha agus i leith leasaithe neamhúdairithe. Ní ghlacann Líonraí Gáis Éireann le haon fhreagracht as athruithe nó as idircheapadh a rinneadh ar an ríomhphost seo i ndiaidh é a sheoladh nó as aon dochar do chórais na bhfaighteoirí déanta ag an teachtaireacht seo nó ag a ceangaltáin. Más é do thoil é, tabhair faoi deara chomh maith go bhféadfar monatóireacht a dhéanamh ar

theachtaireachtaí chuig nó ó Líonraí Gáis Éireann chun comhlíonadh le polasaithe agus le caighdeáin Líonraí Gáis Éireann a chinntiú agus chun ár ngnó a chosaint. Líonraí Gáis Éireann cuideachta ghníomhaíochta ainmnithe, faoi theorainn scaireanna, atá corpraithe in Éirinn leis an uimhir chláráithe 555744 agus a tá hoifig chláráithe ag Bóthar na nOibreacha Gáis, Corcaigh, T12 RX96.

Go raibh maith agat as d'aird a thabhairt.

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Thank you for your attention.



Simon Carleton
Galetech Energy Services
Clondargan,
Stradone,
Co. Cavan, H12 NV06

06 March 2024

Re: Pre-Application Scoping Request for a proposed 110kV Electricity Substation & Underground Electricity Cables in County Roscommon

Your Ref: SEV001SS

Our Ref: 24/62

Dear Simon,

Geological Survey Ireland is the national earth science agency and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and gather various data for that purpose. Please see our [website](#) for data availability. We recommend using these various data sets, when conducting the EIAR, SEA, planning and scoping processes. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'.

The publicly available data referenced/presented here, should in no way be construed as Geological Survey Ireland support for or objection to the proposed development or plan. The data is made freely available to all and can be used as independent scientific data in assessments, plans or policies. It should be noted that in many cases this data is a baseline or starting point for further site specific assessments.

With reference to your email received on the 27 February 2024, concerning the Pre-Application Scoping Request for a proposed 110kV Electricity Substation & Underground Electricity Cables in County Roscommon, Geological Survey Ireland would encourage use of and reference to our datasets. Please find attached a list of our publicly available datasets that may be useful to the environmental assessment and planning process. We recommend that you review this list and refer to any datasets you consider relevant to your assessment. The remainder of this letter and following sections provide more detail on some of these datasets.

Geoheritage

A national inventory of geoheritage sites known as County Geological Sites (CGSs) is managed by the Geoheritage Programme of Geological Survey Ireland. CGSs, as adopted under the National Heritage Plan, include sites that are of national importance which have been selected as the very best examples for NHA (Natural Heritage Areas) designation. NHA designation will be completed in partnership with the National Parks and Wildlife Service (NPWS). CGSs are now routinely included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system. CGSs can be viewed online under the Geological Heritage tab on the online [Map Viewer](#).

The audit for Co. Roscommon was completed in 2012. The full report details can be found [here](#). **Our records show that there are no CGSs in the vicinity of the proposed Electricity Substation and the two electricity cable route options.**

Groundwater

Geological Survey Ireland's [Groundwater and Geothermal Unit](#), provides advice, data and maps relating to groundwater distribution, quality and use, which is especially relevant for safe and secure drinking water supplies and healthy ecosystems. Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. We recommend using the groundwater maps on our [Map viewer](#) which should include: wells; drinking water source protection areas; the national map suite - aquifer, groundwater vulnerability, groundwater recharge and subsoil permeability maps.

For areas underlain by limestone, please refer to the karst specific data layers (karst features, tracer test database; turlough water levels ([gwlevel.ie](#))). Background information is also provided in the Groundwater Body Descriptions. Please read all disclaimers carefully when using Geological Survey Ireland data.



The Groundwater Data Viewer indicates aquifers classed as a 'Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones', a 'Regionally Important Aquifer - Karstified (conduit)' and a 'Locally important gravel aquifer' underlie the proposed Electricity Substation and the two electricity cable route options.

The Groundwater Vulnerability map indicates the range of groundwater vulnerabilities within the area covered is variable. We would therefore recommend use of the Groundwater Viewer to identify areas of High to Extreme Vulnerability and 'Rock at or near surface' in your assessments, as any groundwater-surface water interactions that might occur would be greatest in these areas.

[GWClimate](#) is a groundwater monitoring and modelling project that aims to investigate the impact of climate change on groundwater in Ireland. This is a follow on from a previous project (GWFlood) and the data may be useful in relation to Flood Risk Assessment (FRA) and management plans. Maps and data are available on the [Map viewer](#).

Geological Survey Ireland has completed Groundwater Protection Schemes (GWPSs) in partnership with Local Authorities, and there is now national coverage of GWPS mapping. A Groundwater Protection Scheme provides guidelines for the planning and licensing authorities in carrying out their functions, and a framework to assist in decision-making on the location, nature and control of developments and activities in order to protect groundwater.

The Roscommon Groundwater Protection Scheme summary and Water Quality reports are at: [Roscommon Groundwater Protection Scheme Reports \(gsi.ie\)](#)

Geological Mapping

Geological Survey Ireland maintains online datasets of bedrock and subsoils geological mapping that are reliable and accessible. We would encourage you to use these data which can be found [here](#), in your future assessments.

Please note we have recently launched QGIS compatible bedrock (100K) and Quaternary geology map data, with instructional manuals and videos. This makes our data more accessible to general public and external stakeholders. QGIS compatible data can be found in our downloadable bedrock 100k .zip file on the [Data & Maps](#) section of our website.

Geohazards

Geohazards can cause widespread damage to landscapes, wildlife, human property and human life. In Ireland, landslides, flooding and coastal erosion are the most prevalent of these hazards. We recommend that geohazards be taken into consideration, especially when developing areas where these risks are prevalent, and we encourage the use of our data when doing so.

Geological Survey Ireland has information available on landslides in Ireland via the National Landslide Database and Landslide Susceptibility Map both of which are available for viewing on our dedicated [Map Viewer](#). Associated guidance documentation relating to the National Landslide Susceptibility Map is also available.

Geological Survey Ireland also engaged in a national project on Groundwater Flooding. The data from this project may be useful in relation to Flood Risk Assessment (FRA) and management plans, and is described in more detail under 'Groundwater' above.

Natural Resources (Minerals/Aggregates)

Geological Survey Ireland provides data, maps, interpretations and advice on matters related to minerals, their use and their development in our [Minerals section](#) of the website. The Active Quarries, Mineral Localities and the Aggregate Potential maps are available on our [Map Viewer](#).

We would recommend use of the Aggregate Potential Mapping viewer to identify areas of High to Very High source aggregate potential within the area. In keeping with a sustainable approach we would recommend use of our data and mapping viewers to identify and ensure that natural resources used in the proposed development are sustainably sourced from properly recognised and licensed facilities, and that consideration of future resource sterilization is considered.



Geochemistry of soils, surface waters and sediments

Geological Survey Ireland provides baseline geochemistry data for Ireland as part of the Tellus programme. Baseline geochemistry data can be used to assess the chemical status of soil and water at a regional scale and to support the assessment of existing or potential impacts of human activity on environmental chemical quality. Tellus is a national-scale mapping programme which provides multi-element data for shallow soil, stream sediment and stream water in Ireland. At present, mapping consists of the border, western and midland regions. Data is available at <https://www.gsi.ie/en-ie/data-and-maps/Pages/Geochemistry.aspx>.

Guidelines

The following guidelines may also be of assistance:

- Institute of Geologists of Ireland, 2013. Guidelines for the Preparation of the Soils, Geology and Hydrogeology Chapters of Geology in Environmental Impact Statements.
- [EPA, 2022](#). Guidelines on the information to be contained in Environmental Impact Assessment Reports (EIAR)

Other Comments

Should development go ahead, all other factors considered, Geological Survey Ireland would much appreciate a copy of reports detailing any site investigations carried out. The data would be added to Geological Survey Ireland's national database of site investigation boreholes, implemented to provide a better service to the civil engineering sector. Data can be sent to the Geological Mapping Unit, at <mailto:GeologicalMappingInfo@gsi.ie>, 01-678 2795.

I hope that these comments are of assistance, and if we can be of any further help, please do not hesitate to the Geological Survey Ireland Planning Team at GSIPlanning@gsi.ie.

Yours sincerely,

Geoheritage and Planning Programme

Enc: Table - Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes.

Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes
following European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018
(S.I. No. 236 of 2018)

Geological Survey Ireland Programme	Dataset	Relevant EIA Topic	Coverage	Description / Notes / Limitations	Link to Geological Survey Ireland map viewer
Geohazards	Landslide: National landslide database and land life susceptibility map	Land & Soil/Climatic/Landscape	National	Associated audience documentation relating to the National Landslide Susceptibility Map is also available	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=568d1e490445081950d095e1625c
	Groundwater Flooding (Historic)	Water	Regional	Provide information of historic flooding, both surface water and groundwater. A lack of flooding presented in any specific location of the map only indicates that a flood has not been detected. It does not indicate that a flood cannot occur in that location at present or in the future	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83d57943d6b0865278c735b1cc
Geohazards	Groundwater Flooding (Predictive)	Water	Regional	Provides information on the probability of future karst groundwater flooding (where available). [The maps do not, and are not intended to, constitute advice. Professional or specialist advice should be sought before taking, or refraining from, any action on the basis of the flood maps]	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83d57943d6b0865278c735b1cc
	Radiation Map	Land & Soil/Air	National	http://www.epa.ie/radiation/radomaps/	
Geoheritage	County Geological Sites as adopted by National Heritage Plan and listed in County Development Plan	Land & Soil/Landscape	Regional	All geological heritage sites identified by Geological Survey Ireland are categorised as COS pending any further NHA designation by NPWS	https://decnr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30f518e7474c4ab740e2a3ac3278
Geological Mapping	Bedrock geology	Land & Soils	National	1:100,000 scale and associated memoirs.	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=7012a99d2748e9106e7ee1b6b8658scale=0
	Bedrock geology	Land & Soils	Regional	1:50,000 scale	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=7012a99d2748e9106e7ee1b6b8658scale=0
Geological Mapping	Quaternary geology: Sediments	Land & Soils	National	1:50,000 scale	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=7012a99d2748e9106e7ee1b6b8658scale=0
	Quaternary geology: Geomorphology	Land & Soils	National	1:50,000 scale	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=7012a99d2748e9106e7ee1b6b8658scale=0
Geological Mapping	Physiographic units	Land & Soils	National	Broad-scale physical landscape units mapped at 1:100,000 scale in order to be represented as a cartographic digital map at 1:250,000 scale	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=74a73a31b0c27c42b
Geological Mapping	Geotourism: Spatial geological data for the greater Dublin and Cork areas	Land & Soils	Regional	Includes 3D models	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=97684438b794160938602212a850c8scale=0
Geological Mapping	Geotechnical database	Land & Soils	National	Detailed geotechnical and Site Investigation Reports and boreholes which can be accessed through online downloads	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=32718be18734d7a585a3041584a724c
Geological Mapping	Historical data sets including geological memoirs and 6" to 1 mile geological mapping records	Land & Soils/Water	National	Available online	https://secure.dccae.gov.ie/goldmine/index.html
Groundwater & Geothermal	Groundwater resources (aquifers)	Water	National	Data limited to 1:100,000 scale; sites should be investigated at local scale	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=7aba20301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater recharge	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale; long term annual average recharge	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=7aba20301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater vulnerability	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=7aba20301594687ab14629a10b748ef
Groundwater & Geothermal	Group scheme and public supply source protection areas	Water	National	Not all PWS / GWS have SPZ / ZOC. Check with IW / oco / NIGWS for private supplies.	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=7aba20301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater Protection Schemes	Water	National	Data is limited to scale of 1:40,000. Data does not include all of the source protection areas	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=7aba20301594687ab14629a10b748ef
Groundwater & Geothermal	Catchment and WFD management units	Water	National	For areas underlain by limestone, includes karst features, tracer test	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=7aba20301594687ab14629a10b748ef
Groundwater & Geothermal	Best specific data layers	Water	National	Grabbats: thorough water tests (grounded is)	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=7aba20301594687ab14629a10b748ef
Groundwater & Geothermal	Wells and Springs	Water	National	Not comprehensive; there may be unrecorded wells and springs for more information contact NIGWS / EPA / site investigations	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=7aba20301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater body descriptions	Water	National	Not exhaustive; only those in designated SACs could be other GWOTs; for more information contact NIGWS / EPA / site investigations	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=7aba20301594687ab14629a10b748ef
Groundwater & Geothermal	Geothermal suitability maps	Land & Soils/Water	National	Also: Roadmap for a Policy and Regulatory Framework for Geothermal Energy, November 2020	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=7aba20301594687ab14629a10b748ef
Marine & Coastal Unit	INFOMAR - Ireland's national marine mapping programme, providing key baseline data for Ireland's Water	Water	National	Currently the project to be carried out on the east coast and will be rolled out nationally	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=7aba20301594687ab14629a10b748ef
Marine & Coastal Unit	CHERISH - Coastal change project (Climate, Heritage and Environments of Reefs, Islands, and Health)	Water	Regional	Consideration of mineral resources and potential resources as a material asset which should be explicitly recognised within the environmental assessment process	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=7aba20301594687ab14629a10b748ef
Marine & Coastal Unit	Coastal Vulnerability Index (CVI)	Water / Land & Soils	Regional	Currently the project to be carried out on the east coast and will be rolled out nationally	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=7aba20301594687ab14629a10b748ef
Minerals	Aggregate potential	Land & Soils/Material Assets	National	Consideration of mineral resources and potential resources as a material asset which should be explicitly recognised within the environmental assessment process	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=7aba20301594687ab14629a10b748ef
Minerals	Active quarries	Land & Soils	National	Inventory and Risk Classification 2009. Environmental Protection Agency, Economic Minerals Division and Geological Survey Ireland (EECC)	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=7aba20301594687ab14629a10b748ef
Minerals	Historic mines	Land & Soils/Cultural Heritage	National	A national mapping programme	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=7aba20301594687ab14629a10b748ef
Tellus	Geochemical data: multi-element data for shallow soil, stream sediment and stream water	Land & Soils	Regional	A national mapping programme	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=7aba20301594687ab14629a10b748ef
Tellus	Airborne geophysical data including radiometrics, electromagnetics and magnetics	Land & Soils	Regional	A national mapping programme	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=7aba20301594687ab14629a10b748ef
Tellus	Urban geochemistry mapping (Dublin SURGE project)	Land & Soils	Regional	A national mapping programme	https://decnr.maps.arcgis.com/apps/webappviewer/index.html?id=7aba20301594687ab14629a10b748ef

Notes:
1. The maps and data listed above are available on the Geological Survey Ireland map viewer <https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx>
2. Please read all disclaimers carefully when using Geological Survey Ireland data
3. Geological Survey Ireland and Irish Concrete Federation published guidelines for the treatment of geological heritage in the extractive industry in 2008.



An tÚdarás Sláinte agus Sábháilteachta
Health and Safety Authority

☎ 0818 289 389 ✉ landuseplanning@hsa.ie 🌐 www.hsa.ie

Gaeltech Energy services
Clondargan,
Stradone,
Co. Cavan,
Ireland

Our Ref: 4353

01/03/2024

Re: Pre-planning environmental scoping request regarding a proposed electricity substation and ancillary infrastructure at Moyvannan, Co. Roscommon.

To whom it may concern,

The Health and Safety Authority (the Authority), acting as the Central Competent Authority under the Chemicals Act (Control of Major Accident Hazards Involving Dangerous Substances) Regulations 2015 (S.I. 209 of 2015) gives technical advice to the Planning Authority when requested, under regulation 24(2) in relation to:

- (a) the siting and development of new establishments;
- (b) modifications to establishments of the type described in Regulation 12(1);
- (c) new developments including transport routes, locations of public use and residential areas in the vicinity of establishments, where the siting, modifications or developments may be the source of, or increase the risk or consequences of, a major accident.

Since the above-referenced application appears to be outside the scope of the Regulations, the Authority has no observations to forward.

If you have any queries please contact the undersigned.

Yours sincerely

Geoff Hynes
Inspector,
COMAH, Chemical Production & Storage (CCPS)

Simon Carleton

From: Planning <planning@iaa.ie>
Sent: Monday 4 March 2024 15:15
To: Simon Carleton
Cc: Planning
Subject: RE: Moyvannan Electricity Substation, Co. Roscommon

Follow Up Flag: Follow up
Flag Status: Completed

Dear Simon,

Thank you for your email and request for comments in relation to the proposed grid connection infrastructure for the Seven Hill Wind Farm development.

Based on the information provided at this pre-planning stage, the Authority has no specific requirements for incorporation into any environmental scoping process or similar. Should a formal planning application be submitted, the IAA would likely have no observations.

Kind regards,

Dave

From: Simon Carleton <simon.carleton@galetechenergy.com>
Sent: Tuesday, February 27, 2024 2:27 PM
To: Planning <planning@iaa.ie>
Subject: Moyvannan Electricity Substation, Co. Roscommon

*** This message originated from outside the Irish Aviation Authority. Please treat hyperlinks, attachments and instructions in this email with caution. ***

Good Afternoon,

Please find attached a pre-planning environmental scoping request regarding a proposed electricity substation and ancillary infrastructure at Moyvannan, Co. Roscommon.

Should you have any queries related to the attached, please do not hesitate to contact this office; and we look forward to receipt of any comments you may have in relation to the proposed development.

Kind Regards,
Simon

Simon Carleton
Senior Planner



simon.carleton@galetechenergy.com



+353 (0)86 365 1619 | +353 (0)49 555 5050



Clondargan, Stradone, Co. Cavan, Ireland



www.galetechgroup.com



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=====

=====

Simon Carleton

From: IWT Info <info@iwt.ie>
Sent: Tuesday 27 February 2024 16:23
To: Simon Carleton
Subject: Re: Moyvannan Electricity Substation, Co. Roscommon

Dear Simon,

Thank you for contacting us. We do not have the staff capacity to respond to this consultation at the moment but we will endeavour to respond if possible.

Kind regards,
Fabiola Vieira

On Tue, 27 Feb 2024 at 14:30, Simon Carleton <simon.carleton@galetechenergy.com> wrote:

Good Afternoon,

Please find attached a pre-planning environmental scoping request regarding a proposed electricity substation and ancillary infrastructure at Moyvannan, Co. Roscommon.

Should you have any queries related to the attached, please do not hesitate to contact this office; and we look forward to receipt of any comments you may have in relation to the proposed development.

Kind Regards,

Simon

Simon Carleton

Senior Planner



simon.carleton@galetechenergy.com



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Irish Wildlife Trust, 8 Cabra Road, Dublin 7, D07T1W2
Registered Charity (CRA) Number: 20010966
Facebook: IrishWildlifeTrust
Twitter: @irishwildlife
Phone: 01 445 7259 (landline available Wednesday-Thursday 9:30 to 5pm)

Simon Carleton

Subject: Moyvannan Electricity Substation, Co. Roscommon

From: Deirdre O'Neill <deirdre@nfgws.ie>
Sent: Monday, March 4, 2024 9:18 AM
To: Simon Carleton <simon.carleton@galetechenergy.com>
Subject: RE: Moyvannan Electricity Substation, Co. Roscommon

Hi Simon,

Apologies I am only getting back to you on this now. We have no GWSs in that area, so there are no regulated GWSs or GWSs that are members of the NFGWS within this area that would be affected by the proposed development. But we would recommend that they contact Roscommon Co Co to confirm that there are no smaller unregulated GWSs within this area.

Kind Regards

Deirdre

Development Officer
National Federation of Group Water Schemes
Tel: 093 26487 **Mobile:** 087 7478399



www.nfgws.ie



Help Save Water: Making small changes can make a big difference, follow the link [here](#) for conservation advice.

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From: Simon Carleton
Sent: Tuesday, February 27, 2024 2:34 PM
To: deirdre@nfgws.ie
Subject: Moyvannan Electricity Substation, Co. Roscommon

Good Afternoon,

Please find attached a pre-planning environmental scoping request regarding a proposed electricity substation and ancillary infrastructure at Moyvannan, Co. Roscommon.

Should you have any queries related to the attached, please do not hesitate to contact this office; and we look forward to receipt of any comments you may have in relation to the proposed development.

Kind Regards,
Simon

Simon Carleton
Senior Planner

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1. Regional Engineer, Mr. Paul Costello
2. Engineering Services

29th February 2024

OPW Ref: 97-2024

Re: Pre-planning Environmental Scoping Request for a Proposed Electricity Substation and Ancillary Infrastructure at Moyvannan, Co. Roscommon

Report to Engineering Services:

On 27th February, Simon Carleton of Galetech Energy Services on behalf of Energia Renewables ROI Limited submitted a pre-planning environmental scoping request regarding a proposed electricity substation and ancillary infrastructure at Moyvannan, Co. Roscommon.

There are no Arterial Catchment Drainage schemes located within the area of works proposed and illustrated in the correspondence.

This office would request where the proposed connection to Moyvannan Electricity Substation crosses any river or watercourse, the invert of the pipe crossing should be buried at least a minimum of 1m below the existing bed level of the river or watercourse. The pipes should be embedded in concrete and suitably protected and the location easily identified with marker posts.

There are no records of flooding identified between Moyvannan and Brideswell Co. Roscommon from the Flood Hazard Mapping website (www.floodinfo.ie). We recommend that the information available on www.floodinfo.ie is examined during pre-planning.

Under Section 50 of the 1945 Arterial Drainage Act & SI No.122 of 2010, no person, including a body corporate, shall construct any new bridge or alter, reconstruct, or restore any existing bridge over any watercourse without the consent of the Commissioners or otherwise than in accordance with plans previously approved of by the Commissioners. Where the development intends to install a culvert or bridge over a watercourse as part of the development Section 50 approval will be required in advance from the Commissioners of Public Works. It is also recommended that no additional flooding should occur during or after construction of the substation and associated grid connection cable.

Perhaps Engineering Services might issue a reply to Simon Carleton, simon.carleton@galetechenergy.com of Galetech Energy Services outlining OPW position in due course.

Shane Flaherty

Shane Flaherty, Grade 2 Engineer

29th February, 2023

Simon Carleton

From: Matthew Craig <matthew.craig@2rn.ie>
Sent: Tuesday, February 27, 2024 4:33 PM
To: Simon Carleton <simon.carleton@galetechenergy.com>; Johnny Evans <johnny.evans@2rn.ie>
Cc: windfarms@rte.ie
Subject: RE: Moyvannan Electricity Substation, Co. Roscommon

Hi Simon,

2rn have no fixed linked that will be affected by this development.
There is also a low risk of interference to broadcast services in the area.

Regards

Matthew Craig

Project Engineer
Projects and Coverage Planning
2RN
Block B, Cookstown Court, Old Belgard Road, Tallaght, Dublin 24, Ireland
D24 WK28
Phone: + 353 (0) 1 2082261
Mobile: + 353 (0) 87 7509955

From: Simon Carleton
Sent: Tuesday, February 27, 2024 2:06 PM
To: 'matthew.craig@2rn.ie' <matthew.craig@2rn.ie>; 'johnny.evans@2rn.ie' <johnny.evans@2rn.ie>
Cc: 'windfarms@rte.ie' <windfarms@rte.ie>
Subject: Moyvannan Electricity Substation, Co. Roscommon

Good Afternoon,

Please find attached a pre-planning environmental scoping request regarding a proposed electricity substation and ancillary infrastructure at Moyvannan, Co. Roscommon.

Should you have any queries related to the attached, please do not hesitate to contact this office; and we look forward to receipt of any comments you may have in relation to the proposed development.

Kind Regards,
Simon

Simon Carleton
Senior Planner



simon.carleton@galetechenergy.com



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Simon Carleton

From: Tom Barry <tom.barry@motorolasolutions.com>
Sent: Monday 25 March 2024 07:32
To: Simon Carleton
Subject: Re: Moyvannan Electricity Substation, Co. Roscommon

Follow Up Flag: Flag for follow up
Flag Status: Completed

Simon,

We anticipate no impact from the development as proposed.

Regards,
Tom

On Wed, Feb 28, 2024 at 9:05 AM Tetraireland Info <tetraireland.info@motorolasolutions.com> wrote:

----- Forwarded message -----

From: **Simon Carleton** <simon.carleton@galetechenergy.com>
Date: Tue, Feb 27, 2024 at 3:03 PM
Subject: Moyvannan Electricity Substation, Co. Roscommon
To: tetraireland.info@motorolasolutions.com <tetraireland.info@motorolasolutions.com>

Good Afternoon,

Please find attached a pre-planning environmental scoping request regarding a proposed electricity substation and ancillary infrastructure at Moyvannan, Co. Roscommon.

Should you have any queries related to the attached, please do not hesitate to contact this office; and we look forward to receipt of any comments you may have in relation to the proposed development.

Kind Regards,

Simon

Simon Carleton

Senior Planner



simon.carleton@galetechenergy.com



+353 (0)86 365 1619 | +353 (0)49 555 5050



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Simon Carleton

Subject: Moyvannan Electricity Substation, Co. Roscommon

Dear Mr Carleton,

Towercom presently has no comments in relation to the proposed development.

Our nearest infrastructure is 11km away from your site at Moyvannan.

Thanks for contacting us.

Kind Regards,

Ray

Ray Ryan

Property Manager

m: +353 87 9718041

[Website](#) | [LinkedIn](#)



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From: Simon Carleton

Sent: Tuesday, February 27, 2024 2:41 PM

To: 'requests@towercom.ie' <requests@towercom.ie>

Subject: Moyvannan Electricity Substation, Co. Roscommon

Good Afternoon,

Please find attached a pre-planning environmental scoping request regarding a proposed electricity substation and ancillary infrastructure at Moyvannan, Co. Roscommon.

Should you have any queries related to the attached, please do not hesitate to contact this office; and we look forward to receipt of any comments you may have in relation to the proposed development.

Kind Regards,
Simon

Simon Carleton

Senior Planner



simon.carleton@galetechenergy.com



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Simon Carleton

From: INFO <Information@tii.ie>
Sent: Thursday 21 March 2024 09:01
To: Simon Carleton
Subject: TII Ref: TII24-126399 - EIAR Scoping - Moyvannan Electricity Substation and Grid Connection, Co. Roscommon. Your Ref: SEV001SS

Dear Mr. Carleton,

Thank you for your correspondence of 27 February 2023 regarding the above. Transport Infrastructure Ireland's (TII's) position in relation to your enquiry is as follows.

TII will endeavour to consider and respond to planning applications referred to it, given its status and duties as a statutory consultee under the Planning Acts. The approach to be adopted by TII in making such submissions or comments will seek to uphold official policy and guidelines, as outlined in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). Regard should also be had to other relevant guidance available at www.TII.ie.

The issuing of this correspondence is provided as best practice guidance only and does not prejudice TII's statutory right to make any observations, requests for further information, objections or appeals, following the examination of any valid planning application referred.

National Strategic Outcome 2 of the National Planning Framework includes the objective to maintain the strategic capacity and safety of the national road network. In addition, Chapter 7 'Enhanced Regional Accessibility' of the National Development Plan, 2021 – 2030, sets out the key sectoral priority of maintaining Ireland's existing national road network to a robust and safe standard for users. This requirement is further reflected in the publication of the National Investment Framework for Transport in Ireland and also the existing Statutory 'Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities'.

With respect to pre-application considerations, the recommendations indicated below provide only general guidance for the preparation of any application, which may affect the national road network.

The developer should have regard, inter alia, to the following:

- TII notes that the subject site has proposed access to the non-national road network in the first instance. Consultations should be had with the relevant Local Authority/National Roads Design Office with regard to the locations of existing and future national road schemes in the area.
- TII would be specifically concerned as to potential significant impacts the development would have on the national road network (and junctions with national roads) in the proximity of the proposed development, including the potential haul route.
- The developer should assess visual impacts from existing national roads.
- The developer should have regard to any EIAR/EIS and all conditions and/or modifications imposed by An Bord Pleanála regarding road schemes in the area. The developer should, in particular, have regard to any potential cumulative impacts.
- The developer, in preparing any application, should have regard to TII Publications (formerly DMRB and the Manual of Contract Documents for Road Works).

- The developer should have regard to TII's Environmental Assessment and Construction Guidelines, including the 'Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes' (National Roads Authority (NRA), 2006).
- The planning application should consider the 'Environmental Noise Regulations 2006' (SI 140 of 2006) and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see 'Guidelines for the Treatment of Noise and Vibration in National Road Schemes' (1st Rev., NRA, 2004)).
- It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site, with reference to impacts on the national road network and junctions of lower category roads with national roads.

In relation to national roads, TII's 'Traffic and Transport Assessment Guidelines' (2014) should be referred to in relation to proposed development with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of the NRA/TII TTA Guidelines,, which addresses requirements for sub-threshold TTA.

Any improvements required to facilitate development should be identified. It will be the responsibility of the developer to pay for the costs of any improvements to national roads to facilitate the private development proposed, as TII will not be responsible for such costs.

- The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required.
- In the interests of maintaining the safety and standard of the national road network, the EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network.
- TII recommends that that applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed. Where abnormal 'weight' loads are proposed, separate structure approvals/permits and other licences may be required in connection with the proposed haul route. All national road structures on the haul route through all the relevant County Council administrative areas should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal 'weight' load proposed.

In addition, the haul route should be assessed to confirm capacity to accommodate abnormal 'length' loads and any temporary works required are identified.

The national road network is managed by a combination of PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities, in association with TII.

The applicant/developer should also consult with all PPP Companies, MMarC Contractors and road authorities over which the haul route traverses, to ascertain any operational requirements, including delivery timetabling, etc., to ensure that the strategic function of the national road network is safeguarded.

Where temporary works within any MMarC Contract Boundary are required to facilitate the transport of turbine components to site, the applicant/developer shall contact thirdpartyworks@tii.ie in advance, as a works specific Deed of Indemnity will be needed by TII before the works can take place.

Additionally, any damage caused to the pavement on the existing national road arising from any temporary works due to the turning movement of abnormal loads (e.g., tearing of the surface course, etc.) shall be rectified in accordance with TII Pavement Standards and details in this regard shall be agreed with the Road Authority prior to the commencement of any development on site.

- Any grid connection and cable routing proposals should be developed to safeguard proposed road schemes as TII will not be responsible for costs associated with future relocation of cable routing where proposals are catered for in an area of a proposed national road scheme. In that regard, consideration should be given to routing options, use of existing crossings, depth of cable laying, etc.

In the context of the existing national road network, in accordance with the National Planning Framework National Strategic Outcome no. 2 'Enhanced Regional Accessibility', there is a requirement to maintain the strategic capacity and safety of the network. This requirement is further reflected in the National Development Plan, the National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 'Spatial Planning and National Roads Guidelines for Planning Authorities'. TII notes that grid connection routing outlined in your consultation documentation does not impact the strategic national road network in the area.

Notwithstanding any of the above, the developer should be aware that this list is non-exhaustive, thus site and development specific issues should be addressed in accordance with best practice.

I hope that this information is of assistance to you.

Yours sincerely,

Andrew Moore
Senior Regulatory & Administration Executive

From: Simon Carleton <simon.carleton@galetechenergy.com>
Sent: Tuesday, February 27, 2024 2:41 PM
To: Landuse Planning <LandUsePlanning@tii.ie>
Subject: Moyvannan Electricity Substation, Co. Roscommon

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Good Afternoon,

Please find attached a pre-planning environmental scoping request regarding a proposed electricity substation and ancillary infrastructure at Moyvannan, Co. Roscommon.

Should you have any queries related to the attached, please do not hesitate to contact this office; and we look forward to receipt of any comments you may have in relation to the proposed development.

Kind Regards,
Simon

Simon Carleton
Senior Planner

 simon.carleton@galetechenergy.com
 +353 (0)86 365 1619 | +353 (0)49 555 5050
 Clondargan, Stradone, Co. Cavan, Ireland
 www.galetechgroup.com

For the attention of Simon Carleton
Galetech Energy Services
Clondargan,
Stradone,
Co. Cavan,
Ireland

By Email: simon.carleton@galetechenergyservices.com

Issue Date: 28 February 2024

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Éire

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PO Box 6000
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T: +353 1 89 25000
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www.water.ie

Re: EIA Scoping Request – Moyvannan Electricity Substation, Co. Roscommon.

Dear Simon Carleton,

Uisce Éireann (UÉ) has received notification of your Environmental Impact Assessment (EIA) scoping request relating to Energia Ltd.'s forthcoming for a proposed electricity substation and ancillary infrastructure at Moyvannan, Co. Roscommon.

Please see attached, UÉ's scoping opinion in relation to Water Services. UÉ will review the finalised Environmental Impact Assessment Report (EIAR) as part of the planning process.

UÉ Considerations for Crossings and Diversions of UÉ Assets

In general, where an underground cable is proposed to cross below the identified UÉ assets, UÉ is satisfied that this part of proposal can be facilitated, provided that the applicant ensures that UÉ Assets are protected during the construction & operation phases of the development, and that the required separation distances are achieved between UÉ assets and the underground cable(s), and that any development near UÉ's assets shall be carried out in compliance with UÉ's Technical Standards, Codes of Practice, Standard Details and other associated UÉ requirements.

UÉ requires that pre-application consultation is undertaken between both parties regarding locations where it is considered the proposed cable may impact on existing UÉ infrastructure, such as where the proposal will either cross or be built above UÉ assets, and where diversions of the UÉ asset may be required.

Designs for the development works are required to be in compliance with the UÉ Codes of Practice and Standard Details for Water and Wastewater. These documents outline requirements such as separation distances and depths of cover etc. and can be downloaded from the UÉ website (<https://www.water.ie/connections/developer-services/technical-guidance/>).

The design team should identify, survey and map the exact location of UÉ assets relative to their proposed works to allow UÉ to determine protection measures / diversions. Details of the location of public water services assets, where known, can be obtained by emailing an Ordinance Survey map identifying the Study Area development to datarequests@water.ie.

In scenarios where cable may cross UÉ assets, the applicants will need to take account of these interactions and make an application to the Diversions team in UÉ, by completing the relevant application forms, available from the UÉ website and submit along with the relevant design drawings and the interactions/crossing summary table to include in tabular format;

- Crossing ID
- Crossing Location (Irish Grid Coordinates)
- UÉ Asset Type (Water / Wastewater)
- UÉ Asset Diameter
- UÉ Asset Material
- UGC crossing proposed above / below UÉ Asset
- UGC crossing section drawing number proposed

Drawings will need to include:

- Plan drawing of the overall route map
- Plan drawings of each interaction location (scale 1:500 or similar as appropriate, all assets and separation distances clearly labelled)
- Crossing section drawings proposed (all assets and separation distances clearly labelled)

Following review of the application UÉ will determine if the proposals are acceptable and where appropriate issue a Diversion Agreement Offer or Build Over Agreement Offer to the Developer. Such Agreements are required to be paid for by the applicant and deemed executed by UÉ in advance of any works on the ground.

Any design proposal to divert an UÉ asset must be completed in accordance with UÉ Standard Details and Codes of Practice which are available on the UÉ website. Details on this process can be found at <https://www.water.ie/connections/developer-services/diversions/>.

UÉ's Response to EIA Scoping Requests

At present, UÉ does not have the capacity to advise on the scoping of individual projects. However, in general the following aspects of Water Services should be considered in the scope of an EIA where relevant;

- a) Where the development proposal has the potential to impact an UÉ Drinking Water Source(s), the applicant shall provide details of measures to be taken to ensure that there will be no negative impact to UÉ's Drinking Water Source(s) during the construction and operational phases of the development. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified as part of the report.
- b) Where the development proposes the backfilling of materials, the applicant is required to include a waste sampling strategy to ensure the material is inert.
- c) Mitigations should be proposed for any potential negative impacts on any water source(s) which may be in proximity and included in the environmental management plan and incident response.

- d) Any and all potential impacts on the nearby reservoir as public water supply water source(s) are assessed, including any impact on hydrogeology and any groundwater/ surface water interactions.
- e) Impacts of the development on the capacity of water services (*i.e. do existing water services have the capacity to cater for the new development*). This is confirmed by UÉ in the form of a Confirmation of Feasibility (COF). If a development requires a connection to either a public water supply or sewage collection system, the developer is advised to submit a Pre-Connection Enquiry (PCE) enquiry to UÉ to determine the feasibility of connection to the UÉ network.

All pre-connection enquiry forms are available from
<https://www.water.ie/connections/connection-steps/>.

- f) The applicant shall identify any upgrading of water services infrastructure that would be required to accommodate the proposed development.
- g) In relation to a development that would discharge trade effluent – any upstream treatment or attenuation of discharges required prior to discharging to an UÉ collection network.
- h) In relation to the management of surface water; the potential impact of surface water discharges to combined sewer networks and potential measures to minimise and or / stop surface waters from combined sewers.
- i) Any physical impact on UÉ assets – reservoir, drinking water source, treatment works, pipes, pumping stations, discharges outfalls etc. including any relocation of assets.
- j) When considering a development proposal, the applicant is advised to determine the location of public water services assets, possible connection points from the applicant's site / lands to the public network and any drinking water abstraction catchments to ensure these are included and fully assessed in any pre-planning proposals. Details, where known, can be obtained by emailing an Ordnance Survey map identifying the proposed location of the applicant's intended development to datarequests@water.ie
- k) Other indicators or methodologies for identifying infrastructure located within the applicant's lands are the presence of registered wayleave agreements, visible manholes, vent stacks, valve chambers, marker posts etc. within the proposed site.
- l) Any potential impacts on the assimilative capacity of receiving waters in relation to UÉ discharge outfalls including changes in dispersion / circulation characterises. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified within the report.
- m) Any potential impact on the contributing catchment of water sources either in terms of water abstraction for the development (*and resultant potential impact on the capacity of*

the source) or the potential of the development to influence / present a risk to the quality of the water abstracted by UÉ for public supply should be identified within the report.

- n) Where a development proposes to connect to an UÉ network and that network either abstracts water from or discharges wastewater to a “protected”/ sensitive area, consideration as to whether the integrity of the site / conservation objectives of the site would be compromised should be identified within the report.
- o) Mitigation measures in relation to any of the above ensuring a zero risk to any UÉ drinking water sources (Surface and Ground water).

This is not an exhaustive list.

Please note;

- Where connection(s) to the public network is required as part of the development proposal, applicants are advised to complete the Pre-Connection Enquiry process and have received a Confirmation of Feasibility letter from UÉ ahead of any planning application.
- UÉ will not accept new surface water discharges to combined sewer networks.

I am available to discuss in greater detail and answer any further queries you may have. Please don't hesitate to contact me directly at arobinson@water.ie

PP Ali Robinson

Signed on behalf of Geoffrey Burke
Connections and Developer Services

CONFIRMATION OF FEASIBILITY

Daniel Cagney

Malachy Walsh and Co
The Elm Suite
Loughmore Centre
Raheen Business Park
Limerick
V94R578

14 March 2024

Uisce Éireann
Bosca OP 448
Oifig Sheachadta na
Cathrach Theas
Cathair Chorcaí

Uisce Éireann
PO Box 448
South City
Delivery Office
Cork City

www.water.ie

**Our Ref: CDS24001909 Pre-Connection Enquiry
Moyvannan Substation, Moyvannan, Kiltoom, Roscommon**

Dear Applicant/Agent,

We have completed the review of the Pre-Connection Enquiry.

Uisce Éireann has reviewed the pre-connection enquiry in relation to a Water connection for a Multi/Mixed Use Development of 1 unit(s) at Moyvannan Substation, Moyvannan, Kiltoom, Roscommon, (the **Development**).

Based upon the details provided we can advise the following regarding connecting to the networks;

- **Water Connection**
 - Feasible without infrastructure upgrade by Irish Water
 - There is sufficient capacity for the proposed development.
An existing water main fronts the proposed development site boundary.

This letter does not constitute an offer, in whole or in part, to provide a connection to any Uisce Éireann infrastructure. Before the Development can be connected to our network(s) you must submit a connection application and be granted and sign a connection agreement with Uisce Éireann.

As the network capacity changes constantly, this review is only valid at the time of its completion. As soon as planning permission has been granted for the Development, a completed connection application should be submitted. The connection application is available at www.water.ie/connections/get-connected/

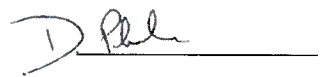
Where can you find more information?

- **Section A** - What is important to know?
- **Section B** - Details of Uisce Éireann's Network(s)

This letter is issued to provide information about the current feasibility of the proposed connection(s) to Uisce Éireann's network(s). This is not a connection offer and capacity in Uisce Éireann's network(s) may only be secured by entering into a connection agreement with Uisce Éireann.

For any further information, visit www.water.ie/connections, email newconnections@water.ie or contact 1800 278 278.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'D. Phelan', is written over a horizontal line.

Dermot Phelan
Connections Delivery Manager

Section A - What is important to know?

What is important to know?	Why is this important?
Do you need a contract to connect?	• Yes, a contract is required to connect. This letter does not constitute a contract or an offer in whole or in part to provide a connection to Uisce Éireann's network(s). • Before the Development can connect to Uisce Éireann's network(s), you must submit a connection application <u>and be granted and sign</u> a connection agreement with Uisce Éireann.
When should I submit a Connection Application?	• A connection application should only be submitted after planning permission has been granted.
Where can I find information on connection charges?	• Uisce Éireann connection charges can be found at: https://www.water.ie/connections/information/charges/
Who will carry out the connection work?	• All works to Uisce Éireann's network(s), including works in the public space, must be carried out by Uisce Éireann*. *Where a Developer has been granted specific permission and has been issued a connection offer for Self-Lay in the Public Road/Area, they may complete the relevant connection works
Fire flow Requirements	• The Confirmation of Feasibility does not extend to fire flow requirements for the Development. Fire flow requirements are a matter for the Developer to determine. • What to do? - Contact the relevant Local Fire Authority
Plan for disposal of storm water	• The Confirmation of Feasibility does not extend to the management or disposal of storm water or ground waters. • What to do? - Contact the relevant Local Authority to discuss the management or disposal of proposed storm water or ground water discharges.
Where do I find details of Uisce Éireann's network(s)?	• Requests for maps showing Uisce Éireann's network(s) can be submitted to: datarequests@water.ie

What are the design requirements for the connection(s)?	• The design and construction of the Water pipes and related infrastructure to be installed in this Development shall comply with <i>the Uisce Éireann Connections and Developer Services Standard Details and Codes of Practice</i>, available at www.water.ie/connections
Trade Effluent Licensing	• Any person discharging trade effluent** to a sewer, must have a Trade Effluent Licence issued pursuant to section 16 of the Local Government (Water Pollution) Act, 1977 (as amended). • More information and an application form for a Trade Effluent License can be found at the following link: https://www.water.ie/business/trade-effluent/about/ **trade effluent is defined in the Local Government (Water Pollution) Act, 1977 (as amended)

Section B – Details of Uisce Éireann’s Network(s)

The map included below outlines the current Uisce Éireann infrastructure adjacent the Development: To access Uisce Éireann Maps email datarequests@water.ie



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Note: The information provided on the included maps as to the position of Uisce Éireann's underground network(s) is provided as a general guide only. The information is based on the best available information provided by each Local Authority in Ireland to Uisce Éireann.

Whilst every care has been taken in respect of the information on Uisce Éireann's network(s), Uisce Éireann assumes no responsibility for and gives no guarantees, undertakings or warranties concerning the accuracy, completeness or up to date nature of the information provided, nor does it accept any liability whatsoever arising from or out of any errors or omissions. This information should not be solely relied upon in the event of excavations or any other works being carried out in the vicinity of Uisce Éireann's underground network(s). The onus is on the parties carrying out excavations or any other works to ensure the exact location of Uisce Éireann's underground network(s) is identified prior to excavations or any other works being carried out. Service connection pipes are not generally shown but their presence should be anticipated.

Simon Carleton

From: Keiran Butler <Keiran.Butler@virginmedia.ie>
Sent: Tuesday, February 27, 2024 4:35 PM
To: Simon Carleton <simon.carleton@galetechenergy.com>
Cc: Cathal O Donnell <Cathal.ODonnell@virginmedia.ie>
Subject: RE: Re Moyvannan Electricity Substation Co.Rosecommon

Hi Simon

Virgin Media **DO NOT** have any radio links in this area

Regards
Keiran

From: Simon Carleton
Sent: Tuesday, February 27, 2024 3:02 PM
To: 'cathal.odonnell@virginmedia.ie' 'liam.allister@virginmedia.ie'
Subject: Moyvannan Electricity Substation, Co. Roscommon

Good Afternoon,

Please find attached a pre-planning environmental scoping request regarding a proposed electricity substation and ancillary infrastructure at Moyvannan, Co. Roscommon.

Should you have any queries related to the attached, please do not hesitate to contact this office; and we look forward to receipt of any comments you may have in relation to the proposed development.

Kind Regards,
Simon

Simon Carleton
Senior Planner

 simon.carleton@galetechenergy.com
 +353 (0)86 365 1619 | +353 (0)49 555 5050
 Clondargan, Stradone, Co. Cavan, Ireland
 www.galetechgroup.com



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