Planning and Environmental Consultants

Response to Further Information Request Ref. No. ACP-320087-24

Proposed Clonberne Grid Connection, Co. Galway

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1. INTRODUCTION

MKO have been instructed by our client, Clonberne Windfarm Limited, (the Applicant) to prepare this report in response to a Further Information (FI) Request issued by An Coimisiún Pleanála (the Commission) under Ref. No. ABP-320087-24 on the 15th of May 2025. The FI Request was made in relation to the proposed development which will comprise of a 220kV Gas Insulated Switchgear (GIS) building, an Independent Power Producer (IPP) compound, a Battery Energy Storage System (BESS) compound, underground grid connection and associated cabling to connect the proposed Clonberne Wind Farm to the national grid via the existing Flagford to Cashla 220kV overhead line in the townlands of Cloonarkan, Clonbern and Laughil, Co. Galway.

The application was submitted to the Commission as Strategic Infrastructure Development (SID) under the provisions of Section 182A of the Planning and Development Act 2000, as amended on the 2nd July 2024. The Commission stated that a response to this FI Request is required by the 17th November 2025 by 5.30pm. An extension was sought on the deadline for the response to the FI Request. This request was granted and a new deadline of the 5th of December 2025 was set. A copy of the FI Request letter received from the Commission is included at **Appendix 1** ***'An Coimisiún Pleanála Further Information Request'***.

The FI Request was issued in accordance with Section 37F(1)(a) of the Planning and Development Act 2000, as amended (the 2000 Act), which sought information on a number of items relating to Procedural Issues and the Battery Energy Storage System. **Section 2** of this RFI presents a detailed response to the individual FI items raised by the Commission. **Section 3** of this RFI presents a response to the matters raised by Third-Party Observers and Statutory Consultees.

At the outset, it is reiterated that the Clonberne Wind Farm development is one integrated project comprising of two distinct components:

- The electrical grid connection works to connect the wind farm to the national grid, which is the subject of this current application under Section 182A of the Act.
- The wind farm and its associated infrastructure, which is the subject of a separate application under Section 37E of the Act.

For ease of reference, the following terminology is used throughout the document:

- Where the '**Proposed Project'** is referred to, this relates to all the project components described in detail in Chapter 4 of this EIAR i.e., Wind Farm and Grid Connection.
- Where **'the Site'** is referred to, this relates to the primary study area for the EIAR, as delineated by the EIAR Site Boundary.
- Where **'Proposed Grid Connection'** is referred to, this refers to his relates to all components within the Grid Connection Application under Section 182A of the Act.
- Where the **'Proposed Wind Farm'** is referred to, this this relates to all components within the Wind Farm Application under Section 37E of the Act.

Both the Environmental Impact Assessment Report (EIAR) and the Natura Impact Statement (NIS) consider the combined impacts of these individual elements of the Proposed Project. In line with the Commission's letter and to avoid duplication, this RFI only addresses those issues directly relating to the Proposed Grid Connection application, except where stated otherwise. A separate RFI in relation to the Proposed Wind Farm is also being submitted to the Commission.

1.1 Proposed Project Description

The Proposed Grid Connection description as set out in the public notices is as follows:

In accordance with Section 182A of the Planning and Development Act 2000 (as amended), Clonberne Windfarm Limited gives notice of its intention to make an application to An Bord Pleanála for permission for a period of 10 years for the following proposed development in the townlands of Cloonarkan, Clonbern, Laughil, Co. Galway.

The proposed development will consist of the following:

I. Construction of a permanent substation which will comprise of a 220kV Gas Insulated Switchgear (GIS) building, an Independent Power Producer (IPP) compound, a Battery Energy Storage System (BESS) compound, including 4 no. 18-metre high Lightning Monopoles, welfare facilities, car parking, wastewater holding tank, 36-metre-high Telecommunications Mast, 2.6-metre high palisade fencing, external lighting, underground cabling, and all associated infrastructure and apparatus;

II. All works associated with the connection of the proposed Clonberne Wind Farm to the national electricity grid, including the provision of underground electrical cabling (220kV) to the existing Flagford to Cashla 220kV overhead line, in the townland of Laughil;

III. The provision of 2 no. loop-in towers, 2 no. gantries within 2 no. cable compounds to facilitate the connection of the proposed substation to the existing Flagford to Cashla 220kV overhead line;

IV. Construction of 2 no. gated permanent site entrances off the L6501 Local Road to facilitate access to the proposed development and the proposed Clonberne Wind Farm;

V. Provision of 4 no. joint bays, communication chambers and earth sheath links along the underground electrical cabling route and temporary accommodation areas to facilitate underground cabling works;

VI. Provision of a cable access track to facilitate the installation and maintenance of cabling and provide access to the proposed substation;

VII. Reinstatement of the road or track surface above the proposed cabling trench along existing roads and tracks;

VIII. Operational access road to the proposed development and the proposed Clonberne Wind Farm;

IX. Site Drainage;

X. Tree felling and hedgerow removal to facilitate construction and operation of the proposed development;

XI. Operational stage site signage; and

XII. All ancillary works and apparatus.

The application is seeking a ten-year planning permission. The development subject of this application will facilitate the connection of the proposed 11 no. wind turbine Clonberne Wind Farm to the national electricity grid. A concurrent application in relation to the proposed Clonberne Wind Farm is also being lodged to An Bord Pleanála.

An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) have been prepared in relation to the project and accompany this planning application.

For completeness, please see below the Proposed Wind Farm description as set out in the public notices:

In accordance with Section 37E of the Planning and Development Act 2000 (as amended), Clonberne Windfarm Limited gives notice of its intention to make an application to An Bord Pleanála for permission for a period of 10 years for the following Proposed Project in the townlands of Killavoher, Gortagarraun, Cloonarkan, Lomaunaghroe, Clonbern, Ballagh West, Carrowntryla and Lissybroder, Co. Galway. The Proposed Project will consist of the provision of the following:

I. *11 no. wind turbines with an overall turbine tip height of 180 metres; a rotor blade diameter of 162 metres; and hub height of 99 metres, and associated foundations, hardstanding and assembly areas;*
II. *Underground electrical cabling (33kV) and communications cabling;*
III. *Provision for the undergrounding of a section of 38kV overhead electrical cabling (as proposed under GCC Ref No. 24/60230), including the provision of 2 no. 38kV Line to Cable Interface End Masts up to a height of 16.2 metres and associated cable ducting to facilitate the undergrounding of the proposed 38kV cabling;*
IV. *Upgrade of existing tracks/ roads and provision of new site access roads, junctions and hardstand areas;*
V. *Construction of 1 no. new gated site entrance off the R328 Regional Road to facilitate the delivery of the construction materials and turbine components to site;*
VI. *Construction of 2 no. temporary construction compounds and associated ancillary infrastructure including temporary site offices, staff facilities and car-parking areas for staff and visitors, all to be removed at end of construction phase;*
VII. *Development of 1 no. borrow pit;*
VIII. *Provision of 3 no. passing bays adjacent to the L22321 Local Road and an existing access track to facilitate the transport of stone material to the site;*
IX. *Peat and spoil management including the provision of 4 no. peat repository areas and 1 no. spoil repository area;*
X. *Junction accommodation works including temporary accommodation areas adjacent to the N83 National Secondary Road, R328 Regional Road and L6466 Local Road to facilitate the delivery of turbine components to site;*
XI. *Site Drainage;*
XII. *Peatland Enhancement Area;*
XIII. *Biodiversity Enhancement Measures (including the planting of woodland, linear habitat, grassland management and invasive species removal);*
XIV. *Tree felling and hedgerow removal to facilitate construction and operation of the Proposed Project;*
XV. *Operational stage site signage; and*
XVI. *All ancillary works and apparatus.*

A thirty five-year operational life from the date of full commissioning of the entire wind farm is being sought and the subsequent decommissioning.

The application is seeking a ten-year planning permission. A concurrent planning application in relation to a proposed substation which will comprise of a 220kV Gas Insulated Switchgear (GIS) building, an Independent Power Producer (IPP) compound, a Battery Energy Storage System (BESS) compound, underground grid connection and associated cabling to connect the proposed Clonberne Wind Farm to the national grid via the existing Flagford to Cashla 220kV overhead line in the townland of Laughil is also being lodged to An Bord Pleanála.

An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) have been prepared in relation to the project and accompany this planning application.

1.1 Policy Overview

This section of the RFI provides an update to the policy overview relating to the Proposed Grid Connection since lodgement of the original planning application and should be read in conjunction with the Chapter 2 - Background of the EIAR and the Planning Report submitted with the planning application.

1.1.1 Renewable Energy Policy

European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. No. 274 of 2025)

In November 2023, a revision of the Renewable Energy Directive[1] (RED III), came into force. RED III increases the EU wide renewable energy target from 32% set under the previous revision of the directive to 42.5%, with an ambition to reach 45% by 2030. The increase was proposed under the publication of REPowerEU plan in May 2022. RED III also introduces specific targets for Member States in the industry, transport, and building (district heating and cooling) sectors.

Under RED III, EU member states must identify areas for the acceleration of renewables where projects will undergo a simplified and fast-track procedure. The deployment of renewables will also be of ***"overriding public interest"*** in order to limit the number of legal challenges on new renewable energy installations. These measures came in response to REPowerEU which found that permitting is the biggest bottleneck for deploying wind at scale, with approximately 80 GW of wind power capacity stuck in permitting procedures across Europe.

There is an 18-month period to transpose most of the directive's provisions into national law, with a shorter deadline of July 2024 for some of the provisions related to permitting for renewables, in particular Article 16(f) which establishes the legal presumption that the construction and operation of renewable energy development and storage assets are in the

> *"overriding public interest and serving public health and safety when balancing legal interest in individual cases for the purposes of Article 6(4) and Article 16(1), point (c), of Directive 92/43/EEC [the 'Habitats Directive'], Article 4(7) of Directive 2000/60/EC [the 'Water Framework Directive'] and Article 9(1), point (a), of Directive 2009/147/EC.[the 'Birds Directive']".*

On 6 August 2025, the European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. No. 274 of 2025) were adopted for the purpose of giving effect to Articles 15e(5), 16, 16b, 16c(2), 16d, 16e and 16f of the RED III Directive.

The legislation introduces new decision timelines based on a "completeness check" (ss.34E, 37JB, 295B): 52 weeks for new wind farms, 30 weeks for repowering projects, and one to two years for IROPI cases (two years for projects over 150 kW, one year for projects under 150 kW or repowering). Importantly, renewable energy developments, including related grid and storage infrastructure, are now presumed to be in the **overriding public interest.**

In order to ensure that the RED III target of 42.5% renewable energy share is achieved, EU Member States must notify their climate and energy objectives, targets, policies, and measures to the European Commission and were established under Regulation (EU) 2018/1999 of the European Parliament and of the Council on the Governance of the Energy Union and Climate Action ('the Governance Regulation')[1]. The Department of the Environment, Climate and Communications (DECC) submitted an updated National Energy and Climate Plan (NECP) 2021-2030 to the European Commission in July 2024. The updated NECP committed to achieving a 43% share of renewable energy in total energy consumption by 2030. In the trajectories set out in the updated NECP, it states that Ireland's proposed trajectory will not be in line with the desired trajectory set out in the Governance Regulation.

Given that Ireland had the lowest share of renewables in energy consumption among EU Member States 20232 (15.3%), the implementation of RED III represents both a legal obligation and an opportunity to remove procedural bottlenecks that hinder critical infrastructure, such as the Proposed Grid Connection required to serve the Proposed Wind Farm development.

[1] *Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (recast)*

National Energy Projections (November 2024)

The National Energy Projections report, published by the SEAI in November 2024, sets out the most recent updates to Ireland's progress towards its binding European and National renewable energy targets.

In 2023 RED II set an EU wide target for overall RES of 32% RES in 2030. Member states set their national contributions to the EU-wide target, with Ireland setting it's at 34.1% in 2030. RED III increased the binding EU-wide target for overall RES to at least 42.5% with Ireland subsequently increasing the target to 43% in 2030.

The decarbonisation of the electricity generation is critical considering the need to electrify other sectors such as heating and transport in order to achieve the sectoral decarbonisation targets. By 2030, renewable energy sources are anticipated to dominate electricity generation, particularly experiencing a significant surge later in the decade attributed to the integration of substantial offshore wind projects.

The most notable conclusion drawn from the Report is the significant gap between projections across both the WEM and WAM scenarios and the legally binding national and EU emission reductions targets. The Report states that even with full implementation of CAP24, Ireland is projected to miss its agreed national and EU 2030 targets for energy efficiency, renewable energy share and greenhouse gas emissions reduction.

Figure 1.27 of the Report, copied below (Figure 2-2), clearly illustrates the gap between the current installed wind capacity and the relevant Climate Action Plan (CAP) targets.

Figure 1.27: Ireland's installed wind capacity with 2024 estimates, projections to 2030, CAP targets

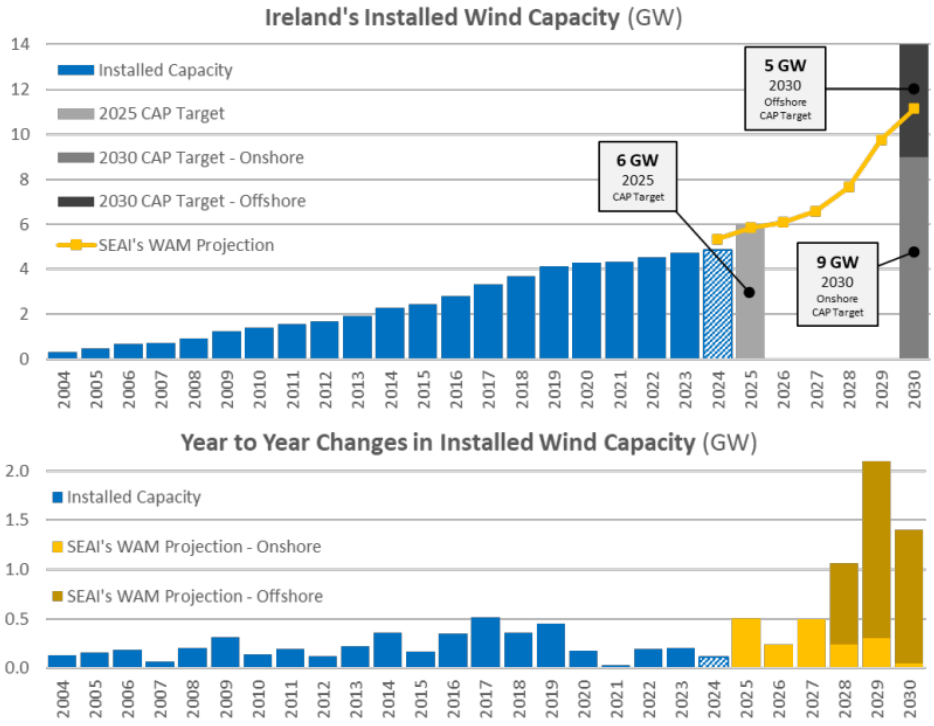

Figure 1-1: Ireland's installed wind capacity with 2024 estimates, projections to 2030, CAP targets

The SEAI projections explore the risk scenarios WEM and WAM, the aim being to address the gap between current policy trajectories and the most ambitious planned policies scenarios. The SEAI scenario modelling do not consider the CAP25 and CAP24, but rather CAP23. The SEAI projections under the 'WAM scenario indicate a total installed capacity of 11.2GW by the end of 2030. The Report goes

on to note that "*Over the last 10 years, Ireland has added wind capacity at an average rate of 0.26GW per annum, although this has dropped to a rate of 0.14GW over the last 5 years. To align with the pace of the WAM projections needed to deliver on the 80% RES-E target, the roll out of onshore wind capacity needs to return to the rate previously achieved between 2016 and 2019…"*

The Report projects GHG emissions under the WEM and WAM scenarios. It notes that since April 2023 there has been a "*significant increase in net electricity imports across the interconnectors with the UK"* and "*electricity net-imports were far higher than other years, and higher than projected in the WEM or WAM scenarios…"* . The Report considers the emission ceiling of the first two carbon budget periods – caron budget 1 (CB1) ceiling 2021-2025 (five year cumulative)($MtCO_2eq$) and carbon budget 2 (CB2) ceiling 2026-2030 (five year cumulative)($MtCO_2eq$) in both the WEM scenario and WAM scenario. In the WEM scenario, total greenhouse gas emissions exceed CB1 by 9% by 2025. This overshoot means that 13% of the CB2 budget is consumed before the CB2 period begins. The second sectoral ceiling is then breached during 2028, with the exceedance reaching 27% by 2030. Under the WAM scenario the CB1 ceiling is exceeded by 6% and this overshoot means that 9% of the CB2 budget is consumed before the CB2 period begins. In this scenario the CB2 ceiling is exceeded by 17% by 2030.

It is clear from the projections outlined above that unprecedented action is required as soon as possible: *"Where any exceedance occurs, steeper reductions are required to compensate, leading to a larger reduction required by 2030."*

Energy in Ireland (December 2024)

In December 2024, the Sustainable Energy Authority of Ireland (SEAI) released an annual publication '*Energy in Ireland'* report which looks at trends in national energy use and at the underlying driving forces, such as the economy and weather, and more recently the impacts of high energy prices. It also examines GHG emissions from energy use, energy security, cost competitiveness, and Ireland's progress towards EU renewable energy targets.

The Report identifies that Ireland's national energy-related emissions in 2023 were at their lowest level in over 30 years. Energy-related emissions in 2023 were 31.4 $MtCO_2eq$, down 8.3% on 2022 levels, and lower even than those observed during the height of COVID impacts in 2020. Energy-related emissions fell by over 2.8 $MtCO_2eq$ in 2023 - the largest annual reduction observed in 12 years. The following are some of the key points, relating to renewable energy and energy emissions:

- Ireland's national energy-related emissions have fallen for seven of the last ten years.
- 14.1% of Ireland's primary energy was renewable in 2023, with fossil fuel remaining the dominant source of Ireland's energy.
- Wind generation provided 33.7% of electricity supply in 2023.
- 2023 electricity emissions were 7.6 MtCO2eq, the lowest on record, down 22% on 2022 levels.
- 2023 was the first year in which fossil fuel generation accounted for less than half of Ireland's gross electricity supply.
  In 2023, Ireland had 4.74 GW of installed wind capacity, up 4.5% on the previous year.

The Report states that over the last 10-years, Ireland has added wind capacity at an average rate of 0.26 GW per annum, although this has dropped to a rate of 0.14 GW over the last 5-years. To align to the pace of the WAM scenario projections needed to deliver on the 80% RES-E target, the roll-out of onshore wind capacity needs to return to the rate previously achieved between 2016 and 2019. The Report then goes on to state the following:

> *"**Increasing wind generation through added wind infrastructure is key to decarbonising Ireland's electricity supply.** The decarbonisation of electricity maximised the positive impact of sustainability technologies like heat pumps and electric vehicles. The recent slow-down in added wind capacity is impacting Ireland's transition to a sustainable energy future. **Renewable capacity must be added faster than electricity demand increases. We must do***

everything we can to support the roll-out of both onshore and offshore wind *and grid-connected solar PV capacity".* (emphasis added)

1.1.2 Planning & Climate Policy

The Planning and Development Act 2024

The Planning and Development Act 2024 (the new Act) was signed into law by the President on the 17th of October 2024, following its passage through both Houses of the Oireachtas. At the time of lodgement of this planning application, the Planning and Development Act 2000 (as amended) remains in place until the new Act is commenced by Ministerial Orders, with the Government indicating that this will be done on a phased basis.

The Government has approved an Implementation Plan for the Planning and Development Act 2024, which sets out the schedule for its phased commencement. The Implementation Plan also outlines a series of initiatives aimed at supporting training and stakeholder engagement across the planning sector to ensure a smooth transition to the new legislative framework. Concurrently, work is ongoing to revise and update the supporting Regulations that will underpin the operation of the new Act.

National Planning Framework First Revision (2025)

On the 8th April 2025, the Government approved the National Planning Framework First Revision (Revised NPF) which was subsequently passed through both Houses of the Oireachtas. The Revised NPF aims to address changes that have occurred in Ireland since 2018.

The Revised NPF provides an updated projection for the population of Ireland, with the population expected to increase to 6.1 million by 2040. This population growth will place further demand on both the built and natural environment, and subsequently, the services required to meet said demands. In order to strengthen and facilitate more environmentally focused planning at the local level, the Revised NPF states that future planning and development will need to:

> *"Tackle Ireland's higher than average carbon-intensity per capita and enable a national transition to a competitive low carbon, climate resilient and environmentally sustainable economy by 2050, through harnessing our country's prodigious renewable energy potential."*

National Strategic Outcome 8 ('*Transition to a Carbon Neutral and Climate Resilient Society*') notes that in creating Ireland's future energy landscape, new energy systems and transmission grids will be necessary to enable a more distributed energy generation which connects established and emerging energy sources, i.e. renewables, to major sources of demand.

Chapter 9: Climate Transition and Our Environment, aims to address key national environmental challenges including the transition to a climate neutral economy, sustainable land management, renewable energy and resource efficiency. As per **NPO 70,** the Revised NPF highlights the importance of renewable energy infrastructure to achieve national climate action targets.

> *"Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a climate neutral economy by 2050."*

Regional Renewable Energy Capacity Allocations have been introduced under the Revised NPF. This was one of the key actions for CAP24 and is supported under CAP25. The Northern and Western Region, in which the Proposed Project is located, is allocated a target of installing an **additional 1,389 MW of onshore wind energy by 2030.**

Under **NPO 74** Regional Assemblies are required to plan for the delivery of the regional renewable electricity capacity allocations outlined in the Revised NPF and identify allocations for each of the local authorities within their RSES. Furthermore, **NPO 75** requires Local Authorities to plan for the delivery of Target Power Capacity (MW) allocations consistent with the relevant RSES, through their City and County Development Plans. At the time of writing, no local Target Power Capacity allocations have been established, however it is clear from the regional allocation that the Northern and Western Region is set to deliver a significant amount of onshore wind energy in the coming years.

The introduction of renewable energy targets represents a more active and prescriptive approach to land use planning for renewable energy development. The Revised NPF aligns the national target of 9GW of onshore wind energy with the policies and objectives of Local Authorities.

In regard to this, it is clear that the provision of new renewable energy generation through the Proposed Wind Farm which will be facilitated by the Proposed Grid Connection is in line with aims and objectives of the Revised NPF, which seeks to transition to a carbon neutral economy.

National Development Plan – 2025 Review

The National Development Plan Review 2025 (NDP) sets out a comprehensive capital investment framework for the period 2026–2035, totalling €275.4 billion. Within this framework, wind energy is recognised as a key enabler of the State's legally binding commitment to reduce GHG gas emissions by 51% by 2030, including a 75% reduction in emissions from the electricity sector, compared to 2018 levels.

The NDP highlights the "*the continued focus and commitment of this Government to climate action and to ensuring Ireland is well positioned to realise the benefits of the transition to a green and sustainable economy*". The NDP emphasises Ireland's climate and renewable energy commitments, "*in addition to the national climate objective and 2030 target, Ireland has similar obligations under the Paris Agreement to limit global warming, and at a European level as part of the European Climate Law to reduce GHG emissions by at least 55% by 2030 compared to 1990 levels, and to achieve climate neutrality by 2050*".

To support the expansion of renewable electricity generation, the Government has allocated €3.5 billion in equity funding to ESB Networks and EirGrid to enhance grid transmission and distribution infrastructure, which will directly facilitate increased integration of wind energy developments such as the Proposed Wind Farm.

Climate Action Plan 2025

The Climate Action Plan 2025 (CAP25) represents the third statutory update to Ireland's climate roadmap under the Climate Act. Building on the foundations laid by previous plans, CAP25 refines and strengthens the strategies necessary to deliver Ireland's legally binding carbon budgets and sectoral emissions ceilings. It sets out a clear trajectory to reduce greenhouse gas emissions by 51% by 2030 and to achieve climate neutrality no later than 2050.

A cornerstone of CAP25 is the decarbonisation of Ireland's electricity system through a substantial increase in renewable energy generation. The plan reaffirms ambitious targets for renewable electricity share which includes 80% by 2030, and 50% by 2025. This is to be achieved through the accelerated deployment of onshore wind (2 GW by 2025; 9 GW by 2030), offshore wind (8 GW by 2030), and solar energy (up to 5 GW by 2025; 8 GW by 2030).

The Proposed Grid Connection will facilitate the delivery of renewable energy to the national grid and in doing so will contribute to the achievement of 80% renewable energy and the delivery of 9GW of onshore wind by 2030, which will reduce Ireland's reliance on imported fossil fuels for electricity generation and contribute to energy security by generating indigenous renewable wind energy.

Programme for Government – Securing's Ireland's Future (January 2025)

The Programme for Government 2025 – Securing Ireland's Future (January 2025) places specific emphasis on climate change, recognising that time is critical in addressing the climate crisis. The Programme states that the Government is committed to taking *"decisive action to radically reduce our reliance on fossil fuels and to achieve a 51% reduction in emissions from 2018 to 2030, and to achieving net-zero emissions no later than 2050".*

The Programme states that the next ten years are a critical period in addressing the climate crisis, and therefore, a deliberate and swift approach to reducing more than half of Ireland's carbon emissions over the course of the decade (2020-2030) must be implemented. The programme states that the Government are committed to reducing GHG emissions by an average 7% per annum over the next decade in a push to achieve a net zero emissions by the year 2050.

With regard to renewable energy generation, the Programme notes that the Government is committed to the rapid decarbonisation of the energy sector. The Programme states the Government's ongoing support and commitment to take "*the necessary action to deliver at least 70% renewable electricity by 2030"*. This target has been updated by subsequent Climate Action Plans.

The Proposed Grid Connection aligns with the Programme for Government as it will contribute to the achievement of 80% renewable energy and the delivery of 9GW of onshore wind by 2030. Subsequently, the Proposed Wind Farm will support the Government's commitment to reducing reliance on fossil fuels and achieving net-zero by 2050.

Carbon Budgets

The first national carbon budget programme proposed by the CCAC, approved by Government and adopted by both Houses of the Oireachtas in April 2022 comprises three successive 5-year carbon budgets . The total emissions allowed under each budget are shown in **Table 1-1** below.

Table 1-1: Carbon Budgets of the Climate Change Advisory Council

	2021 – 2025 Carbon Budget 1	**2026 – 2030 Carbon Budget 2**	**2031 – 2035 Provisional Carbon Budget 3**
	All Gases		
Carbon Budget ($MtCO_2eq$)	295	200	151
Annual Average Percentage Change in Emissions	-4.8%	-8.3%	-3.5%
The figures are consistent with emissions in 2018 of 68.3 $MtCO_2eq$ reducing to 33.5 $MtCO_2eq$ in 2030, thus allowing compliance with the 51% emissions reduction target by 2030.			

Section 6C of the Climate Act provides that the Minister shall prepare, within the limits of the carbon budget, the Sectoral Emissions Ceilings. These ceilings set out the maximum amount of GHG emissions that are permitted in each sector. The Government approved Sectoral Emissions Ceilings on 28th July 2022. The electricity sector is allocated a sectoral ceiling of 40 $MtCO_2eq$ for the first budget (2021-2025) and a sectoral ceiling of 20 $MtCO_2eq$ for the second budget period (2026-2030). In 2024, electricity sector emissions were reported to be 6.3 $MtCO_2eq$ [2].

The Environmental Protection Agency (EPA) reported in May 2025[3] that the first two carbon budgets (2021-2030) – which aim to support the achievement of the 51% emissions reduction target - would not

[2] *Climate Change Advisory Council Annual Review 2025 (April, 2025) https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC-AR2025-Electricity-FINAL.pdf*
[3] *Ireland's Greenhouse Gas Emissions Projections 2023-2050, EPA, May 2025*

be met. In regard to the first carbon budget it is projected that it will be exceeded by 12 Mt CO_2eq in the 'With Existing Measures (WEM)' scenario and by 8 Mt CO_2eq in the 'With Additional Measures (WAM)' scenario. Section 6D – paragraph 5 – of the Climate Act states that non-achievement of the first carbon budget would see the excess emissions carried forward into the second budget period and the second carbon budget would be reduced by that amount. If this occurs this would make achievement of the second budget substantially more difficult. Taking into account the projected excess from the first carbon budget, it is projected that the second carbon budget will be exceeded by 114 MtCO_2eq in the WEM scenario and 77 MtCO_2eq in the WAM. As a result of this, it is stated that *"far higher emissions cuts will be needed to comply with Budget period 3 and subsequent carbon budgets".*

According to the EPA, Ireland is not on track to meet the targets for the first and second carbon budget periods, as set out by the CCAC. As such, it is imperative that projects such as the Proposed Wind Farm that the Proposed Grid Connection will facilitate are consented as they have the potential to decrease carbon emissions through the provisions of renewable electricity to the national grid, thus decreasing the country's reliance on carbon-emitting fossil fuels.

Ireland's Greenhouse Gas Emissions Projections

In May 2024, the Environmental Protection Agency (EPA) published *Ireland's Greenhouse Gas Emissions Projections 2023–2050*, outlining progress towards national and EU climate targets. The report produced two scenarios: *With Existing Measures* (WEM), based on policies in place up to 2022, and *With Additional Measures* (WAM), which included further planned actions such as those in the Climate Action Plan 2024 (CAP24). Despite the inclusion of these additional measures, Ireland was projected to exceed both carbon budgets for 2021–2030 by a wide margin, miss the 51% emissions reduction target (compared to 2018), and fall short of sectoral emissions ceilings across most sectors. The WAM scenario also indicated that Ireland would not meet its 42% EU ESR emissions reduction target by 2030, even when accounting for flexibilities. Notably, the Energy Industries sector was projected to see significant emissions reductions, driven by the expansion of wind and other renewable electricity generation.

In May 2025, the EPA published an updated report on Ireland's Greenhouse Gas Emission Projections, titled 'Ireland's Greenhouse Gas Emissions Projections 2024—2055', which reaffirmed and further emphasised the previous 2023-2050 trends.

The main findings of the report are the following:

- *Ireland is not on track to meet the 51 per cent emissions reduction target (by 2030 compared to 2018) which include many 2024 Climate Action Plan measures. Greenhouse gas emissions are projected to be 9 to 23 per cent lower by 2030 (compared to 2018) which places Ireland further from the 2030 national climate target compared to previous assessments.*
- *Budget period 1 (2021-2025) of 295 Mt CO2eq is projected to be exceeded by between 8 to 12 Mt CO2eq. Budget period 2 (2026-2030) of 200 Mt CO2eq is also expected to be exceeded by a significant margin of 77 to 114 Mt CO2eq (with carryover from Budget period 1).*
- *Sectoral emissions ceilings for 2030 are projected to be exceeded by the Buildings, Electricity, Industry and Transport sectors;*
- *Ireland is not projected to meet its EU target, set under the Effort Sharing Regulation, of a 42 per cent emissions reduction by 2030 (compared to 2005) even with flexibilities applied. This assessment shows that greenhouse gas emissions will be reduced by 10 to 22 per cent by 2030 (compared to 2005) without the use of flexibilities and by 13 to 26 per cent with the use of flexibilities.*
- *Additional measures and accelerated implementation of existing measures is necessary to meet both National and EU targets. Projected gaps to National and EU 2030 targets reported this year are larger than last year due to more conservative delivery of measures and associated estimates of emission reductions by 2030.*

- *From 10.6 Mt CO2eq in 2018, emissions from the Energy Industries sector are projected to decrease to between 3.4 and 4.4 Mt CO2eq in 2030 (a 59 to 68 per cent reduction). Renewable energy generation at the end of the decade is projected to range from 60 to 68 per cent of electricity generation.*

It is stated in the report that the target of 80% share renewable electricity (RES-E) is not projected to be reached. In addition to this, the CAP24 target of 9GW of onshore wind, is projected to fall short in the WAM scenario, with a predicted 7.1MW delivered.

The Proposed Grid Connection will facilitate the delivery of renewable energy to the national grid and in doing so will contribute to the achievement of 80% renewable energy and the delivery of 9GW of onshore wind by 2030. The Proposed Project will reduce Ireland's reliance on imported fossil fuels for electricity generation and aid Ireland in reducing it's greenhouse gas emissions in the electricity sector.

2. FURTHER INFORMATION RESPONSE

This section of the RFI addresses each of the individual FI items. It should be read in conjunction with the relevant supporting information enclosed with and/or appended to this report. The Commission's FI items have been categorised as follows:

- Procedural/Administrative Issues,
- Battery Energy Storage System

A copy of the FI Request issued by the Commission (Ref. No. 320087-24) has also been enclosed with this RFI as **Appendix 1** ***'An Coimisiún Pleanála Further Information Request'*** in the interests of clarity.

2.1 Procedural Issues

2.1.1 Further Information Item No.1

A detailed response to the submissions received from observers, prescribed bodies and the local authority to the application.

2.1.1.1 Response to FI Item No. 1

Section 3 of this RFI responds to all Third-Party and Statutory Consultee submissions related to the Proposed Grid Connection. It seeks to resolve any concerns raised while emphasising the thorough and robust nature of the EIAR, NIS, and supporting documentation. It first provides a structured response to Third-Party observations, grouped by theme, followed by an analysis of individual submissions received from Statutory Bodies. This RFI seeks to respond to submissions solely relating to the current Proposed Grid Connection application Any matters relating to the Proposed Wind Farm element of the Proposed Project are addressed in the RFI submitted for that planning application under Ref No. 320089-24.

2.2 Battery Energy Storage System

2.2.1 Further Information Item No.2

A Fire Risk Management Plan detailing measures to prevent a fire from occurring at the Battery Energy Storage System Compound.

2.2.1.1 Response to FI Item No.2

Appendix 2 ***'Fire Risk Management & Emergency Response Plan'*** of this RFI details a comprehensive Fire Risk Management Plan and an Emergency Response Plan, inclusive of measures to prevent a fire from occurring at the Battery Energy Storage System (BESS) Compound. The Plan has been prepared by D.M Flaherty & Associates – Fire, Structural & Civil Engineering Consultants.

The report aims to respond to the Commission's request to furnish further information in relation to the effects on the environment of the proposed BESS installation following a fire emergency. The report also outlines mitigation, design, procedures and actions to protect lives and safety of site personnel and the emergency service personnel, to protect the environment, to minimize damage and disruption, and to ensure a swift return to normal operations following a critical emergency.

The report outlines design factors that contribute to reducing the escalation in the severity of an incident, critical facilities for The Fire and Rescue Service, and safeguarding for the environment through fire water retention.

The report does not seek to provide a full specification or opinion on the entirety of a BESS system design. Instead, the aim is to limit the content to such matters that directly relate to facilitating a safe and effective response, by the Operator and the Fire and Rescue Service, to a fire or vapour cloud release involving a BESS installation.

As part of this report, a number of recommendations have been made in relation to separation of the BESS container units as the most effective means of preventing a fire event from escalating through radiated fire spread to adjacent BESS containers of building and equipment. these are as follows:

- 30m separation distance (minimum) from the BESS site boundary and occupied building per NFPA 85.
- 10m separation from combustible vegetation.
- 3.1m BESS container distance separation as per guidance from NFPA 855.
- BESS systems will be at least 15 metres from building HVAC air inlets.
- 6.5m fire break between groups of equipment where possible
- 10m separation between the water tank and BESS nearest enclosure

These recommendations have been incorporated, where applicable, and are included within a revised BESS layout within the existing BESS footprint. Updated drawings reflecting these measures, including the 3.1m separation distance between BESS units has been incorporated within a revised of set of drawings. A copy of these drawings is included as **Appendix 3** ***'Update BESS Drawings Provided by TLI Group'*** of this RFI response and are enclosed separately. The drawings have been prepared by TLI Group.

These design measures, in combination with the mitigation measures and emergency response plan detailed in the accompanying report will be fully implemented to reduce the risk of a fire occurrence and ensure an effective emergency response in the event of a fire incident.

2.2.2 Further Information Item No.3

An Emergency Response Plan detailing procedures in the event of a fire occurring and include actions the operator is responsible for. The plan should provide details of proposed water supply for such events and a surface water drainage plan addressing potential, if any, of downstream impacts of firewater. Containment measures to be put in place should be detailed.

2.2.2.1 Response to FI Item No. 3

Appendix 2 ***'Fire Risk Management & Emergency Response Plan'*** of this RFI details a Fire Risk Management Plan and an Emergency Response Plan, inclusive of details of proposed water supply for such events and a surface water drainage plan addressing potential of downstream impacts of firewater. Containment measures to be put in place are detailed within the accompanying report.

In relation to a proposed water supply in the event of a fire, the provision of the large quantity of water in static storage tanks is key to the fire safety strategy for this remote site. Water in abundance is necessary to attempt to control thermal runaway and to prevent fire spread on the site over an extended incident period of 8 hours. Regarding containment measures, fire water retention is achieved using the BESS compound bunding and fire water retention tanks, which will allow in post fire situations the water to be sampled, treated, or removed by licensed hazardous-waste contractors.

Please refer to **Appendix 2** ***'Fire Risk Management & Emergency Response Plan'*** for further details.

3. RESPONSE TO SUBMISSIONS

3.1 Statutory Bodies Submissions

A total of 3 submissions were submitted to the Commission from Statutory Consultees in relation to the Proposed Grid Connection. **Table 3-1** below identifies the Statutory Consultees who lodged a submission to the Commission in relation to the Proposed Grid Connection and who in the project team is responsible for the corresponding response.

Table 3-1: List of Statutory Consultees and Lead Author for Response

Statutory Consultee	Lead Author for Response
Department of Housing Local Government & Heritage	Tobar Archaeology
Transport Infrastructure Ireland	MKO/Alan Lipscombe
Galway County Council	MKO/Alan Lipscombe/Tobar Archaeology

3.1.1 Department of Housing, Local Government & Heritage (The DAU)

A submission was received from the Development Applications Unit (DAU), relating to archaeology items and also noting conditions which should be included in a grant of planning permission.

Appendix 4 ***'Tobar Archaeology Response'*** provides a response to this submission. To summarise, the response provides a range of mitigation and monitoring measures which have been included in Chapter 13 of the EIAR that address the requirements of the DAU, with confirmation that a suitably qualified archaeologist will carry out pre-commencement testing, and will be retained to advise on archaeological monitoring during the decommissioning phase of the Proposed Project including the Proposed Grid Connection.

It is also confirmed that a Construction and Environmental Management Plan (CEMP) will be prepared prior to construction which will include the location of all archaeological and cultural heritage constraints, will identify any potential direct or indirect impacts to same and will detail all mitigation measures to be implemented to ensure the protection of the archaeological and cultural heritage assets during all phases of site preparation and construction activity. A final report detailing the results of archaeological monitoring of ground works and any archaeological investigations such as archaeological testing and excavation undertaken as part of the Proposed Grid Connection will be compiled on completion of the site work.

3.1.2 Transport Infrastructure Ireland

The submission received from Transport Infrastructure Ireland (TII) on the planning application is identical to the submission received from TII on the application for the Proposed Wind Farm (Ref No.320089-24). The Applicant confirms that the Proposed Project can comply with the observations and recommendations provided by TII should they be adopted as conditions by the Commission in any grant of planning permission.

3.1.3 Galway County Council

A submission was received by Galway County Council (GCC) which provided observations on multiple aspects of the Proposed Grid Connection, including Traffic & Transport, Cultural Heritage & Archaeology, and Noise & Vibration. Some of the issues raised by GCC relate to the Proposed Wind Farm, namely Landscape & Visual Impact and certain items regarding Traffic & Transport. A response to these concerns are addressed in Section 3.1.8 of the RFI submitted in relation to the planning application for the Proposed Wind Farm (Ref No. -320089-24).

3.1.3.1 Traffic and Transport

Table 3-2 below sets outs the observations outlined in the GCC submission, along with the corresponding response. The response has been prepared by Alan Lipscombe Traffic & Transport Consultants.

Table 3-2: GCC Traffic & Transport related observations and corresponding response

Item no.	GCC Observation	Response
Item 1	The surrounding local road network comprises sections through bog road terrain in relation to grid connection works, as proposed on the LS-6501, which is a narrow road of circa width <3m, a road profile within a raised cutting with deep open ditches on each verge within sections of predominantly peat terrain. The acquired visibility triangle from grid connection entrance onto LS-6501 will further generate significant roadside intervention	*The mitigation measures proposed for the Proposed Project set out in Section 15.1.13.5.2 of the EIAR includes pre and post construction road condition surveys. A pre-condition survey of roads associated with the Proposed Project will be carried out prior to construction commencement to record the condition of the road. A post construction survey will be carried out after works are completed. The timing of these surveys will be agreed with the local authority. These will include a structural assessment (falling weight deflection) and road improvement works prior to construction where required. As stated in the EIAR it is proposed to agree works with Galway County Council prior to construction.*
Item 2	Considering directly the Road Classification of the local secondary LS-6501 and proposed Grid connection underground ducting excavation works through pavement foundations in peat areas where the resulting carrying capacity of the surrounding public road network is a serious concern. Pavement study including (falling weight deflection) and core testing of the preferred route to be taken by HGV's and or abnormal loadings from the proposed site entrance and along the specified roadway (route) to the proposed site junction of the public road was not demonstrated.	*This response is as provided in the response to item 1 above, however, it should also be noted that while there will be abnormally sized vehicles associated with the Proposed Project, all axle loads will be within accepted limits.*
Item 3	The applicant failed to demonstrate that surrounding culverts and structures crossed over by HGV's and / or including potential abnormal weight loads associated with the development and delivery route and presented in the format of a structure report in relation to demonstrating the structural design details of their structural adequacy to facilitate identified route to subject site.	*This response is as provided in the response to item 1 above, however, it should also be noted that the structural integrity of all structures and culverts on the proposed delivery route will be subject to a pre-commencement inspection upon a grant of permission.*
Item 4	The visibility sight distance triangles where the maximum speed limit resides whilst owing to the sub optimum horizontal and vertical alignment of the road	*As set out Section 15.1.10 of the EIAR, the full 160m visibility splay required for the 80 kph speed limit is available at Junction A on the R328 looking west, while the splay*

	and where the subject site proposes to introduce site entrance(s) onto the R328 and LS 6501 is severely restricted whilst contravening DM standard 28 of the Galway County Development Plan 2022 – 2028. The vertical envelope of visibility (ie intervisibility in relation to crest / sag road profile) onto the R-328 has not been demonstrated in accordance with TII standards.	*looking east is constrained to 67m due to a neighbouring site boundary. A series of traffic management measures is proposed in mitigation for this temporary junction, which are also set out in Section 15.1.10 of the EIAR. The junction design at this location, the available visibility splays, and the traffic management measures, were all included in the Stage 1 Road Safety Audit. Visibility in the vertical plane is addressed in Roads and Traffic FI Item no. 2 (Section 2.3.2 above.)*
Item 5	The Wind Farm delivery route through the LS-6466 is potentially hazardous on a narrow local public road with sections of steep open ditch verge profiles whilst swept path analysis has further demonstrated significant intervention where the aforementioned local road junction adjoins the N83 and the R328 respectively.	*The proposed TDR has now been altered and will no longer utilise the LS-6466 between the N83 and the R328. Please refer to the response provided for Roads and Traffic FI Item no.1 response (Section 2.3.1above).*
Item 6	The Road Safety Audit appears not to have considered the safety and impact implications of the significant road side interventions from swept path analysis and trafficked movements onto National, local and regional roads. In their report the Roads Section note that having regards to additional turning movements generated, sight entrance visibility and the scale of remedial works required and would interfere with the safety and free flow of traffic and endanger public safety by reason of traffic hazard, obstruction of road users or otherwise and therefore would be contrary to the proper planning and sustainable development of the area.	*With regards to the Stage 1 Road Safety Audit and the Turbine Delivery Route, please refer to the Roads and Traffic FI Item no. 5 (Section 2.3.5 above). With respect to the Wind Farm Access Junctions A to F, all were included in the Stage 1 Road Safety Audit, undertaken by Traffico, dated 2024, which is appended to the EIAR. It is noted that the Audit Team accepted all response to the 3 items raised by the Audit Team, as summarised in Section 15.1.11 of the EIAR, and in the Road Safety Audit Feedback Form, included as Appendix A of the Audit report. It is noted that Stages 2 and 3 Road Safety Audits will be undertaken as the Proposed Project progresses. In summary there are no outstanding safety concerns raised by the Auditors.*

3.1.3.2 Cultural Heritage and Archaeology

Galway County Council have requested that archaeological testing and monitoring be included as a condition of any grant of planning permission. **Appendix 4 *'Tobar Archaeology Response'*** provides a response to these items. This recommendation from Galway County Council will be adhered to and is discussed in Chapter 13 of the EIAR.

3.1.3.3 Noise and Vibration

Galway County Council have raised a number of queries in relation to Noise and Vibration impacts, including the following:

> ***"Population and Human health***
>
> *The EIAR submitted does not identify any significant human health and population impacts arising from the proposed grid connection/substation and associated development. The planning express concerns regarding the impact of the proposed hours/days of operation during the construction stage, being 7am to 7pm Monday to Saturday, on existing residential properties in the vicinity of the construction site and haul roads, exposing existing residents to longer durations of noise and vibration than standard construction hours. This matter may be addressed through a reducing [of] the construction hours to acceptable standard hours."*

A response to this item has been prepared by TNEI. Firstly, it should be noted that no vibration effects are anticipated, therefore, airborne noise effects are all that is relevant here. All further commentary in respect of this submission is in relation to noise only.

The core construction hours quoted in the submission are incorrect. Proposed construction hours are 07:00 – 19:00, Monday to Friday and 07:00 – 13:00 on Saturdays.

Construction noise has been considered against the noise level thresholds presented in BS 5228-1:2009+A1:2014 *Code of Practice for Noise and Vibration Control on Construction and Open Sites – Noise.* The thresholds indicate the potential for a significant effect at a dwelling but it should be noted that exceedance of the threshold does not indicate a significant effect and additional factors also need to be considered, such as duration of exposure. For example, a slight exceedance of the threshold level may be considered not significant unless this occurs for a period of one month or more.

The weekday, daytime threshold levels in BS 5228 are based on continuous noise levels for a period of 07:00 – 19:00, which are the same as the construction hours proposed in the EIAR. It should be noted, however, that where the assessment assumes noise levels will occur continuously throughout the day, and with all plant and construction activities occurring concurrently, in reality, construction noise levels are likely to be much less than predicted for the majority of time, as plant and activities move location and vary in duration. It would be highly unlikely for an item of plant or a particular construction activity to be active continuously at a single location, apart from the use of pumps and generators, which can generally be mitigated with ease, through the use of enclosures etc.

Regardless, the predicted construction noise levels, which are presented in Table 12-9 of EIAR Chapter 12, are comfortably below the BS 5228 threshold levels for all time periods, and even if construction was being undertaken continuously between 07:00 and 19:00, no significant impact would be anticipated.

3.2 Third Party Submissions

A total of 4 third-party submissions were submitted to the Commission in relation to the Proposed Grid Connection. **Table 3-3** below outlines the common themes identified within the Third-Pary submissions and specifies who in the project team is responsible for the corresponding response. A response in respect of each matter has been provided in the following sections.

Table 3-3: Key Themes from Third-Party Submissions and Lead Authors for Response

Theme	Lead Author
Ecology, Ornithology	MKO
Hydrology/Hydrogeology	Hydro Environmental Services
Risk of Major Accident/Battery Storage Containers	D.M. Flaherty & associates

Some of the third-party submissions received highlight concerns with respect to the Proposed Wind Farm, inclusive of a range of themes such as Noise, Ornithology, Health Impacts, Shadow Flicker, Visual Impact, Property Devaluation, Community Engagement. These items are addressed separately as part of the RFI submitted for the Proposed Wind Farm under Ref No. 320089-24.

3.2.1 Ecology

A number of Third-Party submissions were made in relation to ecology related matters. The content of these submissions centred around the watercourse crossing which is located within the boundaries of Lough Corrib SAC, and concern for the habitats located adjacent to the proposed cable route within the public road. These observations are addressed below.

Potential Adverse Effects on Lough Corrib SAC

Concerns were raised in relation to the potential negative effects of the Proposed Grid Connection on Lough Corrib SAC, through which the grid cable route passes. In particular, the effect of Horizontal Directional Drilling (HDD) was highlighted. As outlined in Section 7.1.2 of the NIS, the employment of HDD methodologies means that there will be no requirement for instream works. This methodology also results in no disturbance to the river bed and therefore no disturbance of fisheries habitat. Furthermore, no Annex I habitats associated with Lough Corrib SAC or any other SAC were identified at the location of this proposed crossing. The potential for this watercourse crossing to result in deterioration of water quality both at the location of and downstream of the proposed crossing was identified within the NIS. This potential adverse effect is fully mitigated within Section 7.1.3.2 of the NIS under the Mitigations sub-heading '*Watercourse crossing along the Proposed Grid Connection Route (HDD)*', together with a prevention and contingency plan for fracture blow out. Provided that these mitigation measures are strictly adhered to, the conclusions of the NIS remain valid.

Additionally, any potential for adverse effects resulting from the construction of the Proposed Grid Connection through the adjacent cutover bog on water quality are outlined within Section 7.1.3.1.1 of the NIS '*Earthworks (Removal of Vegetation Cover, Excavations and Stock Piling) Resulting in Suspended Solids Entrainment in Surface Waters).*

Annex I *Molinia* meadows

One area of *Molinia* meadow was identified within the Proposed Project site, as shown in Figure 6-7 of the EIAR. Some Third-Party submissions express concerns over the protection of this habitat which may be present to the north of the Proposed Grid Connection Route. However, the Proposed Grid Connection at this location will involve the installation of underground cabling within an existing tarmac roadway. All works will be confined to this roadway and there will be no loss of any adjacent habitats. Additionally, the presence of the existing road means that the footprint of the Proposed Grid

Connection is within a man-made, already-drained habitat and as such the construction and operation of the underground grid connection cable at this location will have no additional drainage effects on any adjacent habitats.

3.2.2 Hydrology/Hydrogeology

A number of Third-Party submissions received raise concerns in regard to hydrology and hydrogeology. A comprehensive response to these submissions is provided in **Appendix 5** ***'Hydro Environmental Services Responses'.***

To summarise, as has already been addressed in the EIAR, the Proposed Grid Connection and proposed 220kV loop-in substation will have any significant effects on hydrology/hydrogeology and a range of mitigation and drainage measures are proposed at these locations which are proposed in Section 9.5 and Appendix 4-5 of the EIAR. Similarly, no significant groundwater effects are anticipated at the proposed on-site substation. One submission claims that HDD has not been considered in Chapter 9 of the EIAR, which is refuted as the requirement for HDD is stated in Section 9.4 of the EIAR and HDD specific mitigation measures are provided in Section 9.5.2.15 of the EIAR. One submission express concern for domestic water supply, particularly in regard to a borehole drilled at the observers residence. Potential effects on local private wells are assessed in Section 9.5.2.4 of the EIAR. Regarding the observers groundwater well in particular, this well is located on the southeast of the Proposed Wind Farm site, approximately 100m to the south of the Grid Connection cable route, no effects on the well source are expected given the shallow nature of the Grid Connection cabling and all other Grid Connection Infrastructure (i.e. substations, HDD and end-masts) not being up-gradient of the groundwater flow direction.

3.2.3 Risk of Major Accident /Battery Storage Containers

A number of the third-party submissions raise concerns in relation to the BESS element of the planning application concerning the potential for the outbreak of a fire at the facility. In response to this RFI, a Fire Risk Management Plan and an Emergency Response Plan, inclusive of measures to prevent a fire from occurring at the BESS Compound has been undertaken and is included in **Appendix 2** ***'Fire Risk Management & Emergency Response Plan'*** of this RFI.

The report responds to concerns raised by Third-Parties in relation to the BESS, by outlining mitigation, design, procedures and actions to protect lives and safety of site personnel and the emergency service personnel, to protect the environment, to minimize damage and disruption, and to ensure a swift return to normal operations following a critical emergency.

The report also outlines design factors that contribute to reducing the escalation in the severity of an incident, critical facilities for The Fire and Rescue Service, and safeguarding for the environment through fire water retention.

4. CONCLUSION

The information provided in this RFI Report, and the accompanying appendices constitutes a full and comprehensive response to the Request for Further Information received from An Coimisiún Pleanála on the 15th of May 2025. Responses to Statutory and Third-Party submissions have also been comprehensively addressed.

In summary, the Proposed Grid Connection, which will facilitate the delivery of renewable energy to the national grid is strongly supported by the following:

European & National Energy and planning policy, guidance and legislation, including

a) REPowerEU and Renewable Energy Directive III,

a) National Planning Framework First Revision

b) National climate and energy policy including CAP 25, with regard to the acceleration of renewable energy roll-out and greenhouse gas emissions reductions,

c) The Climate Act, which requires public bodies to carry out their functions in accordance with the national climate policies and objectives,

d) The provisions of the Wind Energy Development Guidelines, Guidelines for Planning Authorities issued in 2006, and the Draft Wind Energy Guidelines issued in 2019,

e) The National Energy Security Framework and Energy Security in Ireland to 2030 – Energy Security Package.

Regional and Local Level Policy, including:

f) The Regional Spatial and Economic Strategy,

g) The policies of the planning authority as set out in the Galway County Development Plan 2022-2028 in relation to achieving national climate and renewable energy targets and addressing climate change.

Ultimately, it is considered that this Proposed Gid Connection is in accordance with the provisions of proper planning and sustainable development and should be granted planning permission in respect of the suitability of the site and the need for renewable energy development. It is the policy of the government to rapidly accelerate the roll-out of renewable energy technology.

To conclude the Proposed Grid Connection which will facilitate the delivery of renewable energy to the national grid, is strongly supported by European, national, regional and local policies and guidelines aimed at achieving the transition to a low carbon and climate resilient economy, increasing renewable energy generation, and enhancing energy security. It is therefore respectfully requested that the Commission issue a grant of planning permission for the Proposed Grid Connection in accordance with the provisions of proper planning and sustainable development.