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The Secretary  
An Coimisiún Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

18 December 2025  
Our Ref: 214SEV  
Your Ref: ABP-313750-22

Dear Sir/Madam,

Re: Request in accordance with Section 146B of the Planning and Development Act 2000 (as amended) regarding development permitted pursuant to An Coimisiún Pleanála Reference ABP-313750-22.

Location: Turrock, Cronin, Gortaphuill, Glenrevagh, Tullyneeny, Bredagh, Cuilleenirwan, Cuilleenoolagh, Curry, Milltown, Tobermacloughlin, Skeavally, Boleyduff, Clooncaltry, Feacle, Cam, Tawnagh, Cornageeha, Pollalaher, Brideswell, Knocknanool, Ballymullavill, Rooskagh, Bellanamullia, Cloonakille, Monksland and Commeen, Co. Roscommon.

## 1.0 INTRODUCTION

On behalf of our client, Energia Renewables ROI Limited (hereafter referred to as 'the Requester'), we hereby submit a request to An Coimisiún Pleanála ('the Commission') pursuant to Section 146B of the Planning & Development Act 2000 (as amended) ('the Planning Act') to alter the terms of the above-referenced Strategic Infrastructure Development (SID).

The documentation furnished to the Commission as part of this request comprises:-

- Cover Letter;
- Drawings including site location plans and site layout plans;
- Environmental Impact Assessment Screening; and,
- Addendum Natura Impact Statement.

## 2.0 LEGISLATIVE PROVISIONS

Section 146B(1) of the Planning Act provides that, upon the request of any person who is carrying out or intending to carry out a SID permitted pursuant to Section 37 of the Planning Act, the Commission may alter the terms of the permitted development. In determining whether, or not, to approve the proposed alteration, the Commission must first consider whether or not the proposed alteration is material i.e. significant (Section 146B(2)(a)). Before making this determination, the Commission may invite submissions from any third parties it considers appropriate. If the Commission determines that the proposed alteration would not constitute a material alteration, it shall alter the terms of permission accordingly.

If, however, the Commission determines that the proposed alteration would constitute a material alteration (Section 146B(3)(b)), it shall require the Requester to submit the Environmental Impact Assessment (EIA) Screening information specified at Schedule 7A of the Planning and Development Regulations 2001 (as amended) ('the Planning Regulations') unless the Requester has already provided such information. This information shall be accompanied by any further relevant information on the characteristics of the proposed alteration and its likely significant effects on the environment including, where relevant, the results of any other assessments carried out pursuant to European Union (EU) legislation (Section 146(3A)) and any mitigation measures to avoid or prevent likely significant adverse effects on the environment (Section 146(3B)). If, having assessed this information, the Commission determines that the proposed alteration would have no likely significant effects on the environment, it may make the proposed alteration, make an alternative alteration or refuse to make the alteration.

If the Commission determines that the proposed alteration would be likely to have a significant effect on the environment, the provisions of Section 146C shall apply and the Requester shall be required to submit an Environmental Impact Assessment Report (EIAR).

### 3.0 RATIONALE FOR THIS REQUEST

On 7 June 2022, the Requester submitted a SID planning application to the Commission for the development of a 20 no. turbine wind energy development known as the 'Seven Hills Wind Farm' and which proposed:-

- i. 20 no. wind turbines with an overall ground to blade tip height of 180 metres, a rotor diameter of 162m and a hub height of 99m, associated foundations, hardstanding areas;
- ii. 15 no. spoil storage areas at hardstands of turbines no. 1, 2, 3, 4, 5, 6 and 7 (in the townlands of Turrock, Gortaphuill, Cronin, and Tullyneeny) and turbines no. 8, 10, 11, 13, 14, 17, 19 and 20 (in the townlands of Milltown, Cuilleenoolagh, Cloonacaltry, Feacle and Tawnagh);
- iii. Provision of 1 no. permanent meteorological mast with a maximum height of 100 metres for a period of 30 years from the date of commissioning of the entire wind farm;
- iv. Provision of 1 no. 110kV onsite substation in the townland of Cam, along with associated control buildings, MV switchgear building, associated electrical plant, associated security fencing, and equipment and wastewater holding tank;
- v. All underground electrical and communication cabling connecting the proposed wind turbines to the proposed onsite substation and associated control buildings and plant;
- vi. All works associated with the connection of the proposed wind farm to the national electricity grid via underground 110kV cabling from the site to the existing Athlone 110kV substation located in the townland of Monksland. Cabling will be placed within the public road corridor of the R362, R363 and L2047, or on private land;

- vii. Upgrade works to the existing 110kV Athlone substation consisting of the construction of an additional dedicated bay to facilitate connection of the cable;
- viii. Provision of 2 no. new site accesses north and south from the R363 and upgrade of 1 no. junction south of the R363;
- ix. Provision of new access tracks/roads and upgrade of existing access tracks/roads;
- x. 7 no. overburden storage areas;
- xi. 2 no. temporary construction compounds;
- xii. Site drainage works;
- xiii. Operational stage site signage; and,
- xiv. All associated site development works, apparatus and signage.

On 23 November 2023, the Commission granted planning permission for the development subject to conditions (Reference ABP-313750-22) ('the permitted development').

As described above, the permitted development provides for the installation of 110kV underground cabling within private lands and within the R363, R362 and L2407 to connect the on-site electricity substation to the Athlone 110kV electricity substation at Monksland and the completion of upgrade works to the Athlone electricity substation. However, due to factors outside of the Requester's control; including the proposed connection of a number of third party developments to the Athlone electricity substation and the prioritisation of connecting those developments over the Seven Hills Wind Farm; it has been concluded that connection to the Athlone electricity substation no longer represents the optimal solution for connecting the wind farm to the national electricity network.

It is now proposed, therefore, that the wind farm will connect to the national electricity network via a permitted electricity substation to be located in the townland of Moyvannan, County Roscommon and approximately 7.5-kilometres (km) of 110kV electricity line between the village of Brideswell and the 110kV electricity substation (Reference ABP-321238-24). At the junction of the R363 regional road and the L7636 local road, in the village of Brideswell, the underground electricity line permitted under Reference ABP-321238-24 will connect to the underground cabling permitted under Reference ABP-313750-22.

Consequently, the permitted underground cabling between Brideswell and the Athlone 110kV electricity substation and the upgrade works to the substation will no longer be required.

Separately, wind farm electrical and communications cabling; connecting the wind turbines to the on-site electricity substation; is permitted to be installed within private lands and within the public road network. Cabling from the northern cluster of wind turbines generally follows on-site access tracks before being installed within the R363 for approximately 4km and re-entering private lands and proceeding to the electricity substation. Cabling arising from the southern cluster of turbines follows on-site access tracks before following the L7535 (0.5km) and R363 (2km) and proceeding to the electricity substation.

It is proposed to alter the route of the wind farm cabling to minimise the linear extent

of same to be installed within the public road network. The proposed re-routing of the cabling will have a substantial beneficial effect in terms of reducing the direct (excavations) and indirect effects (traffic disruption, reduced traffic volumes, etc.) on the public road network.

Site location and site layout plans of the permitted development are enclosed at Annex 1; while plans of the proposed alteration are provided at Annex 2 and further described at Section 4.0 below.

#### 4.0 SCOPE OF THE PROPOSED ALTERATION

Having regard to the above background rationale, the proposed alteration being sought by the Requester comprises:-

- 1) The omission of approximately 9km of 110kV underground cabling and associated ancillary infrastructure between Brideswell and the Athlone 110kV electricity substation;
- 2) The omission of all permitted upgrades to the Athlone 110kV electricity substation;
- 3) The re-routing of wind farm cabling between the wind turbines and the on-site 110kV electricity substation; and,
- 4) The construction of approximately 520m of wind farm access track and installation of approximately 760m of wind farm cabling between turbine T18 and the on-site electricity substation.

#### 4.1 OMISSION OF 110kV UNDERGROUND CABLING

The permitted development provides for the connection of the on-site electricity substation to the Athlone 110kV electricity substation via approximately 12km of underground electrical cabling and associated electrical equipment (joint bays, communication chambers, etc.). However, as described above, it is no longer proposed to connect to the Athlone 110kV substation; and, instead, the Seven Hills Wind Farm will connect to the national electricity network via a new 110kV electricity substation at Moyvannan (County Roscommon) and the installation of approximately 7.5km of underground electricity line.

Accordingly, the section of underground cabling (approximately 9km in length) and associated infrastructure between the junction of the R363 and the L7636, in the village of Brideswell, and the Athlone 110kV electricity substation is no longer required, is not proposed to be constructed and is proposed to be omitted from the development as permitted. Furthermore, all construction activities associated with the installation of this section of underground cabling; including horizontal directional drilling (HDD) at 3 no. locations; will also no longer be required.

#### 4.2 OMISSION OF UPGRADE WORKS TO ATHLONE 110kV ELECTRICITY SUBSTATION

The permitted development provides for the completion of upgrade works to the Athlone 110kV electricity substation comprising the construction of a 110kV air-insulated switchgear bay and the installation of electrical equipment including *inter alia* a circuit breaker, transformers and surge arrestors.

Given, as described above, that the Seven Hills Wind Farm will no longer connect to the Athlone 110kV electricity substation, the permitted upgrade works will no longer be required and are not proposed to be completed. Therefore, it is proposed to omit

the carrying out of these works from the development as permitted.

#### 4.3 RE-ROUTING OF WIND FARM CABLING

As described above, wind farm cabling connecting the wind turbines to the on-site electricity substation is located in both private lands and the public road network.

From the northern cluster, wind farm cabling, from each turbine, currently follows the network of access tracks to the site entrance from the R363. From this point, the cabling follows the R363 for approximately 4km before re-entering private lands and continuing along wind farm access tracks to the electricity substation. It is proposed to alter the route of the cabling to reduce the distance within which the cabling is installed within the R363. Having exited the northern cluster, the cabling will follow the R363 for a distance of c. 1.7km to the junction of the R363 and L7535 before continuing along the L7535 for a distance of c. 0.5km and entering the southern cluster. The wind farm cabling will then follow the network of access tracks within the southern cluster to turbine T18.

Wind farm cabling arising from the southern cluster of turbines currently follows the network of access tracks to the site entrance from the L7535, continues along the L7535 for a distance of c. 0.5km and follows the R363 for a distance of c. 2.3km before re-entering private lands and following wind farm access tracks to the electricity substation. It is proposed to alter the route of the cabling such that all cabling is directed from each individual turbine along the network of access tracks to turbine T18. Accordingly, there will no longer be any wind farm cabling associated with the southern cluster of turbines located within the public road network.

#### 4.4 CONSTRUCTION OF ACCESS TRACK AND INSTALLATION OF WIND FARM CABLING

As described at Section 4.3 above, all wind farm cabling from both the northern and southern wind turbine clusters will be re-routing to turbine T18. From T18, it is proposed to construct approximately 520m of wind farm access track to the electricity substation. In addition, it is proposed to install approximately 760m of wind farm cabling immediately adjacent to the access track which will connect the cabling from the northern and southern clusters to the electricity substation.

The wind farm access track will be identical to those already permitted at the wind farm site and will have a general running width of 4-5m. Similarly, the access track will be constructed using similar methodologies to the permitted access tracks, with the precise methodology being dependent on localised ground conditions. All environmental control and mitigation measures committed to in respect of the permitted access tracks, and wider project as relevant, shall be applied in full to the proposed access track.

The wind farm cabling will, similarly, be constructed identically to that of the permitted development and will be installed in ducting within a trench of approximately 1.2m in depth. As above, all relevant construction methodologies, environmental controls and mitigation measures applicable to the permitted wind farm cabling shall be applied to the proposed cabling.

#### 5.0 MATERIALITY TEST

As described in Section 2.0 above, in accordance with Section 146B of the Planning Act, the Commission must first determine if the proposed alteration constitutes a material alteration. If it is determined that the proposed alteration is not material, then

the Commission must proceed to issue an order altering the permission accordingly.

If, however, the proposed alteration is determined to be material, then the Commission shall require the environmental information as specified in Section 146B(3)(b), (3A), (3B) and/or (3C) to be submitted, unless that information has already been provided by the Requester. Following an assessment of this information, the Commission may determine to make the alteration, make the alteration in different terms or refuse to make the alteration.

Schedule 5 of the Planning Regulations specifies the classes of development which must be subject to formal Environmental Impact Assessment (EIA) pursuant to EU and national law. Where an EIA is required, an EIAR must be prepared. The SID planning application for the permitted development was accompanied by an EIAR as the development (20 no. turbines/120MW electrical output) exceeded the threshold as set out in Schedule 5, Part 2, Para. 3(j) of the Planning Regulations, which states that EIA is required for:-

*“Installations for the harnessing of wind power for energy production (wind farms) with more than 5 turbines or having a total output greater than 5 megawatts”*

As this request comprises a proposed alteration to a permitted development which has previously been subject to EIA, the Requester submits that Schedule 5, Part 2, Paragraph 13, ‘Changes, extensions, development and testing’, is the applicable criteria for assessing whether an EIA is required and which states at paragraph (a):-

*“Any change or extension of development already authorised, executed or in the process of being executed (not being a change or extension referred to in Part 1) which would:-*

- (i) result in the development being of a class listed in Part 1 or paragraphs 1 to 12 of Part 2 of this schedule, and*
- (ii) result in an increase in size greater than –*
  - 25 per cent, or*
  - an amount equal to 50 per cent of the appropriate threshold,*

*whichever is the greater”*

In the first instance, the proposed alteration is not a change or extension referred to in Part 1 and will also not give rise to a development of a type listed at Part 1 of Schedule 5 of the Planning Regulations. Secondly, the permitted development has previously been subject to EIA and the proposed alteration will not result in a development listed at paragraphs 1 to 12 of Part 2 of Schedule 5.

Accordingly, the Requester submits that the proposed alteration does not fall for mandatory assessment under the EIA Directive and, given that the proposed alteration is very minor in nature and clearly does not exceed the thresholds as prescribed in Schedule 5, Part 2, Paragraph 13, it does not constitute the making of a material alteration to the permitted development. Accordingly, the Commission is not required to proceed to assess this request any further.

Strictly without prejudice to the above, in the event that the Commission determines that the proposed alteration is material, a sub-threshold EIA Screening has been prepared by the Requester pursuant to Section 146B(3)(b)(i) and is enclosed at Annex 3.

The EIA Screening includes all the information specified in Schedule 7A of the Planning

Regulations and concludes that the proposed alteration, on its own or cumulatively, will have no likely significant effects on the environment.

Moreover, no further mitigation measures are required above and beyond those included in the original EIAR for the permitted development.

The Requester therefore submits that the environmental information submitted further supports the conclusion that the proposed alteration is not material. However, in the event that the Commission determines that the proposed alteration is material, all the required environmental information has already been provided which concludes that the preparation and submission of an EIAR pursuant to Section 146C is not required. Accordingly, the Commission can proceed to make the proposed alteration.

## 6.0 HABITATS DIRECTIVE APPROPRIATE ASSESSMENT

Section 146B(3A) of the Planning Act provides that where the Requester is submitting to the Commission the information referred to in Section 146B(3)(b)(i), that information shall also be accompanied by any further relevant information including, where relevant, information on how the available results of other relevant assessments of the effects on the environment carried out pursuant to EU legislation, other than the EIA Directive, have been taken into account.

Following the completion of a Stage 1 Appropriate Assessment Screening, a full Natura Impact Statement (NIS) pursuant to the EU Habitats Directive (92/43/EEC) was prepared in respect of the permitted development and submitted as part of the SID planning application. In its assessment of the development, the Commission determined that the permitted development “...*would not adversely affect the integrity of European Sites in view of the sites' Conservation Objectives...*” and that “*there is no reasonable scientific doubt as to the absence of such effects.*”

As described above, the Requester submits that the proposed alteration is very minor in nature and does not constitute the making of a material alteration to the permitted development. Accordingly, the Commission is not required to proceed to assess this request pursuant to Section 146B(3A).

Nevertheless, and strictly without prejudice to the above and having regard to the precautionary principle and the Commission's general obligations pursuant to the Habitats Directive, in the event that the Commission determines that the proposed alteration is material, an *Addendum to Appropriate Assessment Screening and Natura Impact Statement* ('Addendum NIS') has been prepared to support this request and to assess whether the proposed alteration could result in any likely significant effects on European designated nature conservation sites (Natura 2000), both individually and in combination with other existing, permitted and proposed developments. The Addendum NIS, enclosed at Annex 4, concludes beyond all reasonable scientific doubt that the proposed alteration, either alone or in combination with any other plans and projects, will not undermine integrity of any European (Natura 2000) sites having regard to their conservation objectives.

## 7.0 COMPLIANCE WITH CONDITIONS OF CONSENT

As discussed above, Section 146B(3B) of the Planning Act provides that, where the Requester is submitting to the Commission the information referred to in Section 146(3)(b)(i), that information may be accompanied by a description of the features, if any, of the alteration under consideration and the measures, if any, envisaged to avoid or prevent what might otherwise be significant adverse effects on the

environment of the proposed alteration.

Again, as described above, the Requester submits that the proposed alteration is very minor in nature and does not constitute the making of a material alteration to the permitted development. Accordingly, the Commission is not required to proceed to assess this request pursuant to Section 146B(3B).

Nevertheless, and strictly without prejudice to the above, in addition to the information provided at Annex 3, which assesses that the proposed alteration will have no likely significant effect on the environment and that no further mitigation measures are required above and beyond those included in the original EIAR for the permitted development, the Commission attached a total of 26 no. conditions of consent to the grant of planning permission. We have examined each condition to assess whether the proposed alteration can be achieved without affecting compliance with same.

In summary, it can be confirmed that the proposed alteration can be implemented in full compliance with all extant conditions of the consent. A selection of key conditions which are considered specifically relevant to this request are further addressed in the following sections.

#### 7.1 CONDITION NO. 1

*The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, including the further information received by the Board (Commission) on the 31<sup>st</sup> day of March 2023 and on the 10<sup>th</sup> day of July 2023, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to the commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.*

*Reason: In the interest of clarity.*

The Requester can confirm that, other than the proposed alteration which is the subject of this request (or any previous or future request which may be approved by the Commission pursuant to Section 146B), the permitted development shall be carried out and completed in full accordance with the plans and particulars lodged with the planning application.

#### 7.2 CONDITION NO. 5

*The developer shall ensure that all construction methods and environmental mitigation measures set out in the Environmental Impact Assessment Report, Natura Impact Statement, the further information response submission and all associated documentation, including the Biodiversity Mitigation and Enhancement Plan and associated Farm Plan, are implemented in full, save as may be required by conditions set out below.*

*Reason: In the interest of protection of the environment.*

The Requester can confirm that all construction methods and mitigation measures as set out in the EIAR, NIS, and further information response and associated documentation will be implemented in full.

No further mitigation measures are required above and beyond those provided for in respect of the permitted development.

### 7.3 CONDITION No. 6

*The developer shall ensure that all soil and water quality related mitigation measures are implemented in full and monitored throughout the life cycle of the construction works and monitored throughout the operational phase, the excavation works for the turbine foundations and on-site spoil depositories should avoid incursion into the underlying bedrock, and where this cannot be locally avoided, excavation works shall not extend below or to within two metres of the winter water table.*

*Reason: To protect groundwater in the area, public water supplies, and the quality and quantity of water in the surrounding interconnecting turloughs.*

The Requester can confirm that all soil and water quality related mitigation measures shall be implemented in full throughout the construction and operational phases. The Requester can further confirm that excavations to be undertaken, related to the construction of the access track and installation of wind farm cabling, shall not generally extend below a depth of 1.2m. Accordingly, it is unlikely that there will be any incursion into underlying bedrock; however, in the event of same, excavation works shall not extend below or to within two metres of the winter water table.

No further mitigation measures are required above and beyond those provided for in respect of the permitted development.

### 7.4 CONDITION No. 7

- (a) The wind turbines shall be as indicated in the plans and particulars submitted with the application.*
- (b) Details of the colouring for the turbines shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.*
- (c) Cables within the site shall be placed underground.*
- (d) The wind turbines shall be designed to ensure that the blades rotate in the same direction.*
- (e) No advertising material shall be placed on or otherwise affixed to any structure on the site without a prior grant of planning permission.*

*Reason: In the interest of visual amenity.*

The Requester can confirm that all cables within the site shall be placed underground and that the proposed alteration will have no effect on the permitted development's compliance with the above requirements.

### 7.5 CONDITION No. 10

*The developer shall retain the services of a suitably qualified and experienced ecologist to undertake pre-construction survey at the various project elements, immediately prior to commencing work in order to check for the presence of protected and sensitive species in the vicinity including badgers, otters, nesting birds, bats and plants. A 500 metre to 700 metre buffer should be placed around any protected bird species net sites and maintained free from construction works until the nest is vacated. Bridges along the grid connection route shall be examined for the presence of roosting bats. Derogation licences shall be obtained for the removal of any bat roost or other holts.*

*Reason: In the interests of protecting ecology and wildlife in the area.*

It is assessed that the proposed alteration will have no effect on compliance with this condition of consent. The Requester can confirm that a suitably qualified and experienced ecologist shall undertake pre-construction surveys prior to the commencement of construction, that a suitably sized buffer shall be applied around bird nesting sites until the nest(s) have been vacated and that bridges along the grid connection route shall be examined for the presence of roosting bats.

#### 7.6 CONDITION No. 11

*The developer shall comply with the following additional nature conservation requirements:-*

- (a) No hedgerow felling or vegetation removal shall take place during the bird breeding period between the 1<sup>st</sup> March and 31<sup>st</sup> August.*
- (b) Replacement hedgerow planting shall comprise of indigenous Irish hedgerow species and progress shall be monitored on an annual basis until the hedgerows reach maturity.*
- (c) A five metre buffer zone shall be installed around Autumn Lady's Tresses orchid sites for the duration of the construction works.*

*Reason: In the interests of biodiversity and nature conservation.*

It is assessed that the proposed alteration will not affect the ability of the development to comply with this condition and the Requester can confirm that all requirements shall be adhered to in full.

The proposed construction of the access track and installation of the wind farm cabling will result in the loss of approximately 42m of existing hedgerow. The permitted development provides for a net gain of 290m in terms of hedgerow planting and, accordingly, there will be no overall loss of hedgerow. All replacement hedgerow shall comprise indigenous Irish species and shall be monitored on an annual basis until the hedgerow reaches maturity.

#### 7.7 CONDITION No. 14

*The developer shall implement mitigation measures to lessen the potential for impacts on badgers arising from the excavation and construction works:-*

- (a) A 30 metre cordon shall be installed around any badger sett entrances, which shall be screened and remain in place throughout the construction works,*
- (b) There shall be no artificial lighting of any badger sett entrances during the construction and operational phases,*
- (c) During the breeding season, no works shall take place within 50 metres of the sett for general construction and 150 metres for noisy and vibratory activities,*
- (d) The built-in construction design shall allow for escape from trenches.*

*Reason: To ensure appropriate monitoring of the impact of the development on the badger species in the area.*

It is assessed that the proposed alteration will not affect compliance with this condition and the Requester can confirm that all requirements set out therein shall be implemented in full.

#### 7.8 CONDITION No. 16

*The preservation, recording and protection of archaeological materials or features that may exist within the site shall be facilitated. In this regard, a suitably qualified archaeologist shall be retained to monitor all site investigations and other excavation works and provide arrangements for the recording and for the removal of any archaeological material considered appropriate to remove.*

*Reason: In order to conserve the archaeological heritage of the site and to secure the preservation and protection of any remains that may exist within the site.*

The Requester can confirm that the requirements of this condition shall be implemented in full; with site investigations and excavations associated with the proposed access track and wind farm cabling being monitored by a suitably qualified archaeologist.

#### 7.9 CONDITION No. 17

*The construction of the development shall be managed in accordance with a Construction and Environmental Management Plan, which shall be finalised prior to commencement of development. This plan shall provide details of intended construction practice for the development, including hours of working, noise, vibration, dust monitoring and management measures, traffic management, an invasive species management plan, and off-site disposal of construction and excavation waste. A construction noise management plan and a contingency plan for remedial action shall be prepared in the event that monitoring levels indicate an exceedance of limits, before works commence.*

*Reason: In the interests of public safety and residential amenity.*

The Requester can confirm that the proposed alteration will have no effect on the requirements of this condition and that the particulars of the proposed alteration shall be incorporated within the Construction and Environmental Management Plan, construction noise management plan and contingency plan.

#### 7.10 CONDITION No. 18

*Prior to commencement of development, a transport management plan for the construction stage shall be submitted to, and agreed in writing with, the planning authority. The traffic management plan shall incorporate details of the road network to be used by construction traffic, including over-sized loads, and detailed arrangements for the protection of roads, bridges, culverts or other structures to be traversed, as may be required. The plan should also contain details of how the developer intends to engage with and notify the local community in advance of the delivery of oversized loads. Any works, including reinstatement works, works to existing junctions on the national road network, and grid connection cable excavations under the national road network shall comply with Transport Infrastructure Ireland standards as outlined in Transport Infrastructure Ireland Publications, planning authority roads requirements, and shall be subject to Road Safety Audit as appropriate.*

*Reason: In the interests of traffic safety and the proper planning and sustainable development of the area.*

The proposed alteration will result in a substantial reduction in effects on transport and access through the reduced volume of construction activities being undertaken being undertaken within the public road corridor. The proposed alteration will result in

approximately 9km of 110kV underground cabling and in excess of 2km of wind farm cabling not being installed within the public road network which will, in turn, significantly reduce the volume of direct (i.e. excavations) and indirect (traffic volumes, traffic disruption, etc.) effects on the road network. Additionally, the proposed alteration will avoid the installation of the 110kV underground electricity line beneath the N6 national road.

Notwithstanding the above, a Transport Management Plan will be prepared and agreed in writing with the Planning Authority and shall address each of the matters referred to in the condition; and the proposed alteration will have no effect on compliance with this condition.

## 8.0 CONCLUSION

As described at Section 2.0 above, Section 146B of the Planning Act provides for immaterial and material alterations to be made to developments permitted under Section 37 of the Planning Act. In this instance, the proposed alteration to the permitted development comprises the omission and re-routing of permitted underground cables, the omission of electrical equipment to be installed within an electricity substation, the construction of a short section of access track and the installation of a short section of wind farm electricity cabling.

Having regard to the characteristics of the proposed alteration, the characteristics of the receiving environment, the conclusions of the EIA Screening and the findings of the Addendum NIS; the Requester submits that the proposed alteration does not constitute a material alteration to the permitted development and will not result in any likely significant adverse effects on the environment. Accordingly, the Commission can proceed to alter the permission.

If, however, the Commission is of the opinion and determines that the proposed alteration is a material alteration to the permitted development, the Applicant submits that all of the required and relevant information required under Section 146B(3)(b)(i) has been provided to the Commission. In particular, an EIA Screening in accordance with Schedule 7A of the Planning Regulations has been provided with this request and includes all of the information required pursuant to Section 146B(3A) and Section 146B(3B) which concludes that the preparation and submission of an EIAR pursuant to Section 146C is not necessary. Accordingly, the Commission can proceed to make the proposed alteration.

The Requester therefore respectfully requests the Commission to alter the terms of the planning permission to provide for:-

- 1) The omission of approximately 9km of 110kV underground cabling and associated ancillary infrastructure between Brideswell and the Athlone 110kV electricity substation;
- 2) The omission of all permitted upgrades to the Athlone 110kV electricity substation; and,
- 3) The re-routing of wind farm cabling between the wind turbines and the on-site 110kV electricity substation; and,
- 4) The construction of approximately 520m of wind farm access track and installation of approximately 760m of wind farm cabling between turbine T18 and the on-site electricity substation.

We trust that this information is in order, but should the Commission require any further

information please do not hesitate to contact us.

Yours sincerely,

Galetech Energy Services

Galetech Energy Services

## ANNEX 1 – DRAWINGS OF PERMITTED DEVELOPMENT



## ANNEX 2 – DRAWINGS OF PROPOSED ALTERATION



## ANNEX 3 – ENVIRONMENTAL IMPACT ASSESSMENT SCREENING



## ANNEX 4 – ADDENDUM NATURA IMPACT STATEMENT

