



An
Bord
Pleanála

Inspector's Report ABP-316191-23

Development	Section 146B amendment application for proposed alterations to the previously approved Celtic Interconnector Project (ABP-310798-21)
Location	Knockraha, Co. Cork
Planning Authority	Cork County Council
Requester	EirGrid
Type of Application	Application under Section 146B of the Planning and Development Act, 2000 (as amended) to alter previously approved Strategic Infrastructure Development.
Inspector	Sarah Lynch

Contents

1.0 Introduction.....	3
1.4. Landfall at Claycastle Beach.....	4
1.5. Converter Station site at Ballyadam.....	4
1.6. Knockraha Substation.....	5
1.7. Midleton/Youghal Greenway – Part 8.....	6
2.0 Proposed Changes.....	6
3.0 Requester’s Submission.....	7
4.0 Legislative Provisions.....	8
5.0 Assessment.....	10
1.0 Recommendation.....	14

1.0 Introduction

1.1. The requester was granted approval under ref: 310798-21 for the development of an electricity interconnector connecting the existing electricity grids in Ireland and France consisting of a 700 MW connection between Knockraha substation in East Cork and a substation at La Martyre in the Finistere region of France. The interconnector will comprise both onshore and subsea cables and have a total length of 575km.

1.2. Approximately 32km of the cable route and associated infrastructure was subject to the aforementioned Strategic Infrastructure Application approved by the Board. The development included:

- Installation of High Voltage Direct Current (HVDC) underground cables for approximately 32km connecting the landfall point at Claycastle Beach and the converter station compound at Ballyadam, east of Carrigtwohill.
- Construction of an electricity converter station and adjoining ESB substation within two compounds with a combined site area of approximately 3.6ha comprising at Ballyadam.
- Installation of High Voltage Alternating Current (HVAC) underground cables for approximately 11km in length connecting the proposed converter station compound at Ballyadam to the connection point to the grid (at the existing Knockraha substation),
- Connect to the National Grid at an existing bay within the existing Knockraha substation. The new equipment, (combined area of approx. 1.9ha) accommodated within the existing fence line of Knockraha substation comprising:
 - 400kV and 220kV Air Insulated Switchgear (AIS) equipment.
 - 400/220kV transformer.
 - Lightning protection poles (max height of 20m).
 - Small relay room

1.3. Planning History

Given the nature of the proposed development and the location of the cable within the public road there are a large number of applications for one-off houses particularly on

the local roads within the rural area. Relevant permissions of similar developments include:

ABP PL.17.VA0002 - East West Interconnector – Permission was granted for a submarine cable from Ireland to Wales. The landfall section of the development commenced at North Beach, Rush Co. Dublin continued to a converter station in County Meath. This development also included a fibre optic link for operational control, communication, and telemetry purposes.

ABP PL.02.VA0017- Interconnector between Ireland and Northern Ireland – the SID element – a 400kV overhead line was granted permission in December 2016.

Kerry County Council ref: EX371 - Killpaddoge to Knockanure 220kV underground cable project Co. Kerry, this development was deemed to be exempt development and has similarities to the proposed project in terms of laying an underground cable.

1.4. **Landfall at Claycastle Beach**

No applications of note.

1.5. **Converter Station site at Ballyadam**

Ref. 06/8898 – Permission granted November 2006 for site development works to facilitate the future construction of biotechnology manufacturing facility to include temporary construction access with associated widening of road, signalised junction at intersection off N25 and Hedgy Boreen with associated road works, 20kV substation in a compound with switchgear building and 2 no. transformer pads, gas compound/above ground installation with associated control buildings, earthworks to include cut and fill operations to prepare the site for construction of future buildings, attenuation/retention pond, demolition of 2 dwelling houses, internal access roads, provision for 600 no. surface level car parking spaces, gravelled areas for future buildings, retaining wall and lighting standards, underground services and associated manholes, site boundary treatments to include security fencing and landscaping and all associated and ancillary site development works.

Ref. 06/8669 - permission granted August 2006 for the erection of 2 steel masts to facilitate the retirement of portion of overhead line.

Ref. 06/10555 – permission granted November 2006 for construction of enclosed 110kV indoor substation and boundary fence.

1.6. **Knockraha Substation**

There is a substantial planning history associated with the infrastructure on this substation. The following is of note:

Ref. 13/6402 (PL04.244030) – Permission granted on appeal for the extension of the existing 220 kV substation busbar in an easterly direction by approximately 109m including the installation of two 220 kV wing couplers, 2 sectionalising circuit breaker bays with associated equipment, six 24m lightning masts and 2 new line bays with associated equipment; The proposed extension of the existing busbar will occur on lands of approximately 1.14ha within the associated proposed easterly extension of the existing substation lands, with the associated extension of the existing substation perimeter fence line by approximately 72m to the east; Associated construction of 5 lattice steel towers adjacent to the northern side of the substation (as extended) which are up to approximately 46m above ground level, with associated conductors; Associated removal of 3 existing lattice steel towers adjacent to the northern side of the existing substation with associated conductors; Associated reconfiguration of the overhead line entries from the north and north east into the existing substation to facilitate the works within the substation; Associated removal of the westernmost existing transformer within the substation, and other associated equipment including 1 gantry, 6 sets of redundant overhanging conductors including 2 associated gantries and 1 220 kV coupler bay with its associated equipment; Associated construction of new internal access road, boundary treatment and site development works.

Ref. 08/7931 (PL04.231154) – Permission granted on appeal for alterations to existing 220kv station to include installation of one 220Kv to 110Kv transformer, associated bund wall and noise attenuation barriers, 4 no. gantry structures, surge arrestors, current transformers, voltage transformers, circuit breakers, disconnects pantographs, 2 control cabins and associated site works.

Ref. 08/7401 - Permission granted for alterations to existing station comprising of new noise barriers to existing transformers T2101 and T2102 and associated site works.

Ref. 04/699 – Permission granted for a 36 metre high, free standing communications structure, carrying antenna and communication dishes with associated ground mounted equipment cabinets.

Ref. 03/397 – Permission granted for the installation of a waste treatment system in the existing sub-station site.

Ref. 01/2926 (PL04.126105) – Permission granted on appeal for refurbishment of 220kv station to include replacement of control building, high voltage equipment, additional bay kiosks and cabling ducting.

1.7. **Midleton/Youghal Greenway – Part 8**

This greenway is located along the disused railway line from Youghal to Midleton and is c.23km in length. It was approved in January 2019 under Part 8 and is scheduled to be complete c.2023.

2.0 **Proposed Changes**

2.1. The proposed alterations primarily include the provision of high voltage electricity infrastructure which will connect into existing electricity transmission infrastructure at Knockraha substation. The proposed development will encroach onto an area of grassland and deciduous woodland.

2.2. The alterations specifically include the following:

- Cable sealing end (CSE) compound adjacent to the existing substation covering an area of c.0.75ha which will include the following:
 - Single 400kV bay with electrical air insulated switchgear (c. 60m x 30m)
 - Control and protection building (c. 19m x8m x7.5m).
 - 400kV and 200kV voltage transformers and voltage auxillary supply transformer.
 - Bunded back up diesel generator.
 - Interface Kiosk
 - Five lightning masts

- An access road with the CSE compound c 4.5m wide and 148m long.
- A security palisade approximately 2.4 metres high, site lighting and drainage.
- Minor repositioning of approved structures within the Area of the Knockraha substation to reorientate an approved bay and high voltage equipment from a north-south alignment to an east-west alignment and an increase in height of the 220kV fly over conductor by c. 2 metres.
- The addition of a second control kiosk (5m x 3m x 2.5m)
- Minor change in the routing of the approved HVAC cable route at Knockraha from approved substation extension to the subject Section 146B extension.
- Associated internal access road between the existing substation compound and the proposed CSE compound c. 6m wide and 275m long.
- Alteration to lighting mast design and layout.
- No additional construction compounds or laydown areas will be required.
- Ground levels to remain as existing.

3.0 Requester's Submission

- 3.1. The alterations sought are outlined above. It is EirGrid's contention that the proposed works can be implemented while still ensuring that the overall terms and conditions of the permitted Celtic Interconnector project can continue to be met.
- 3.2. It is contended by the applicant that the approved operational profile would not be materially affected by the proposed alterations (alterations and extension to in-situ substation and subsequent approved extension). It is also contended that the proposed alterations would not give rise to significant environmental effects, and the overall character of the electricity transmission infrastructure will not be altered. The applicant states that the proposed alterations will not be materially different to what has been consented in terms of visual and landscape impacts.
- 3.3. The applicant further states that changes proposed to the Knockraha substation would result in no real change within the existing Knockraha substation aside from the addition of a substation apparatus, repositioning/realignment of approved

infrastructure components and the provision of acoustic enclosures to cover any scenario where ESN may wish to install same.

- 3.4. The proposed CSE will contain the same type of transmission equipment as is already existing and approved within Knockraha substation. It is of note that the proposed alterations take up a stated area of 8,932.8m² out of a permitted area of 1410, 000m² under the Celtic Interconnector consent.
- 3.5. The applicant in their submission refers to precedent cases in relation to prior 146B cases, i.e. ABP 307401-20, in which a substation area was increased from 5000m² to 11,070m² including an increase in the size of the control building from 180m² to 450m². An additional similar case is referred to whereby alterations were required as a result of a change in ESB requirements and can be found under ref: ABP 312644-22.

4.0 **Legislative Provisions**

Section 146B. — (1) Subject to subsections (2) to (8) and section 146C, the Board may, on the request of any person who is carrying out or intending to carry out a strategic infrastructure development, alter the terms of the development the subject of a planning permission, approval or other consent granted under this Act.

(2)(a) As soon as practicable after the making of such a request, the Board shall make a decision as to whether the making of the alteration to which the request relates would constitute the making of a material alteration of the terms of the development concerned.

(b) Before making a decision under this subsection, the Board may invite submissions in relation to the matter to be made to it by such person or class of person as the Board considers appropriate (which class may comprise the public if, in the particular case, the Board determines that it shall do so); the Board shall have regard to any submissions made to it on foot of that invitation.

(3)(a) If the Board decides that the making of the alteration would not constitute the making of a material alteration of the terms of the development concerned, it shall alter the planning permission, approval or other consent accordingly and notify the person who made the request under this section, and the planning authority or each planning authority for the area or areas concerned, of the alteration.

(b) If the Board decides that the making of the alteration would constitute the making of such a material alteration, it shall —

(i) by notice in writing served on the requester, require the requester to submit to the Board the information specified in Schedule 7A to the Planning and Development Regulations 2001 in respect of that alteration, or in respect of the alternative alteration being considered by it under subparagraph (ii)(II) , unless the requester has already provided such information, or an environmental impact assessment report on such alteration or alternative alteration, as the case may be, to the Board, and

(ii) following the receipt of such information or report, as the case may be, determine whether to —

(I) make the alteration,

(II) make an alteration of the terms of the development concerned, being an alteration that would be different from that to which the request relates (but which would not, in the opinion of the Board, represent, overall, a more significant change to the terms of the development than that which would be represented by the latter alteration), or

(III) refuse to make the alteration.

(3A) Where the requester is submitting to the Board the information referred to in subsection (3)(b)(i), that information shall be accompanied by any further relevant information on the characteristics of the alteration under consideration and its likely significant effects on the environment including, where relevant, information on how the available results of other relevant assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive have been taken into account.

(3B) Where the requester is submitting to the Board the information referred to in subsection (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 have been significant adverse effects on the environment of the alteration.

(4) Before making a determination under subsection (3)(b)(iii), the Board shall determine whether the extent and character of —

(a) the alteration requested under subsection (1), and

(b) any alternative alteration it is considering under subsection (3)(b)(ii)(II)

are such that the alteration, were it to be made, would be likely to have significant effects on the environment (and, for this purpose, the Board shall have reached a final decision as to what is the extent and character of any alternative alteration the making of which it is so considering).

5.0 **Assessment**

5.1. **Consideration of Materiality**

- 5.2. As noted in the documentation accompanying the request the proposed alteration entails minor alterations and associated extension to the substation at Knockraha which will include additional substation apparatus such as surge arrestors and earth switches, repositioning/realignment of approved infrastructure components from a north/south to an east/west alignment and optional provision of acoustic enclosures. It is also proposed to include a Cable Sealing End adjacent to Knockraha substation which will be similar to the permitted and existing transmission equipment at Knockraha. Access will be provided to the proposed extension via an existing access road. The proposed development would result in an extension footprint comprising 7,486m² and extending c. 52m further east than permitted.
- 5.3. I note from Section 4.3.2 of the report submitted that the existing substation at Knockraha is 55,016m². The permitted Celtic Interconnector substation component adds c. 7,746.5m² and the alteration seeks an extension of 8,932.8m². As outlined above the overall area of the Celtic Interconnector is c. 141ha, as such the proposed extension represents a 0.63% increase in area of the overall Celtic Interconnector project.
- 5.4. The original application was accompanied by a suite of documents including but not limited to a Planning Report, Environmental Impact Assessment Report and an Appropriate Assessment Screening Assessment.
- 5.5. It is important to note at this juncture that the applicant has considered the potential for significant effects in terms of EIA and cumulative effects arising from the proposed development. Table 3.1 clearly outlines the likely significant effects on the environment. It is stated within this table that significant effects are not expected as a

result of the proposed alterations and all impacts can be appropriately managed through the implementation of mitigation measures approved under the parent permission of the Celtic Interconnector ABP-310789-21.

5.6. In the context of the assessment of the development as proposed and approved under ref. ABP 310798-21 and having regard to the information submitted with this 146B application I submit:

- No new considerations arise in terms of national, regional and local policy compliance. The substation extension and associated works are essential enabling infrastructure to support the now permitted Celtic Interconnector development. It complies with and supports the wider strategic objectives set out in national, regional and local policies, all of which seek to promote and development renewable energy and facilitate the transition to a low carbon economy.
- The increase in size of the substation and CSE compound footprint will have no impact on residential amenities in terms of noise with the separation distance of c.300 metres to the nearest dwelling to the southwest not significantly altered. Condition 14 attached to the approval stipulates operational noise levels not to be exceeded at the nearest noise sensitive location and I note that noise abatement measures are included within the proposed alterations which form part of this 146B application.
- In view of the separation distances and intervening screening in the form of hedgerow boundaries etc from sensitive receptors and given the existing infrastructure present on site, I consider that the proposed extension which will comprise electrical transmission infrastructure will read in conjunction with the existing and permitted substation as a whole rather, than a perceptible additional development in its own right. The proposed alterations will be imperceptible when viewed from the wider landscape and will make no appreciable change to the overall appearance of the complex.
- The substation access is to remain unaltered. The increase in floor area would have no discernible impact on construction traffic or the vehicular movements by maintenance staff during the operational phase.

- The site is characterised by habitat and species normally associated with managed agricultural land with no protected habitat or species identified.
- The increase in floor area will have no discernible impact on surface water runoff. The CSE compound will have a new dedicated storm water drainage system with no additional mitigation measures required beyond those approved within the parent permission ABP-310798-21. There are no water demand or wastewater discharges associated with the development other than storm water as mentioned.
- There are no recorded monuments within or in the vicinity of the proposed alterations. The proposed area will be taken into the pre-construction verification geophysical survey and archaeological test trenching that will be undertaken as part of the advance works programme prior to construction.

5.7. **Conclusion**

5.8. I submit that the alterations sought would not give rise to significant environmental effects beyond those already considered in the Environmental Impact Assessment that accompanied the original application and the Board's assessment of same.

5.9. **Finding in Respect of Materiality**

I am satisfied that the proposed alterations can be implemented while still ensuring that the approved substation and associated works can continue to be met without impediment. The modifications will not alter the character of the approved development.

5.10. I submit that no new considerations arise in relation to impacts on the environment which were not considered in the assessment of impacts for ABP 310798-21

5.11. I am of the opinion, having fully considered the proposed alterations and the development as approved under ABP 310798-21, that the Board would not have determined the proposal differently had the modifications now proposed in the alteration formed part of the said application. In that regard, I consider it reasonable to conclude that the proposal subject of this request does not constitute the making of a material alteration of the development as approved under ABP 310798-21.

5.12. I have considered the provisions of section 146B(2)(b) which provides for, at the Board's discretion, the invitation of submissions from persons, including the public. I

am of the opinion that the inviting of submissions from the public in this instance is not necessary and is not required for the purposes of the Board in determining the matter.

5.13. I would be of the opinion that the proposed alterations that are fully contained within the substation compound are minor in nature. These amendments will result in the visual profile of the substation site changing slightly; however, the pattern, form, scale and nature of the overall development will remain unchanged. There is no potential for cumulative impacts with other elements of the overall project given scale of the alterations and the separation distances involved.

5.14. Appropriate Assessment

5.15. It is important to clarify at the outset that under ABP 310798-21 the Board completed an appropriate assessment screening exercise in relation to Natura 2000 sites within the zone of influence of the application site. The Board concluded that on the basis of the information on file, which was considered adequate in order to issue a screening determination, that likely significant effects could not be ruled out for the Great Island Channel SAC, Ballymacoda (Clonpriest and Pillmore) SAC, Blackwater River (Cork/Waterford) SAC, Cork Harbour SPA, Ballymacoda Bay SPA, Blackwater Estuary SPA, Mullaghanish to Musheramore Mountains SPA.

5.16. A Stage 2 Appropriate Assessment accompanied this application in relation to the above European designated sites which included a detailed assessment of all of the sites listed above and the associated qualifying interests. The NIS examined the potential for likely adverse effects to these sites and proposed mitigation measures to prevent any such adverse effects from arising. The NIS concluded that following the implementation of the mitigation measures proposed, the proposed development individually, or in combination with other plans or projects would not adversely affect the integrity of the European site Nos. 001058, 000077, 002170, 004030, 004028, 004162, 004023 in view of these sites Conservation Objectives.

5.17. I note that an Appropriate Assessment Screening has been carried out by the applicant in relation to the proposed alterations and accompanies this application.

5.18. Having considered the Board's determination on appropriate assessment on ABP 310798-21, section 8.0 of the Inspector's Report on the said file, the nature, scale and extent of the proposed alterations relative to the development subject of, and permitted under ABP 310798-21, and the information on file including the Appropriate

Assessment Screening document submitted by the applicant, which I consider adequate to carry out appropriate assessment screening, I consider it reasonable to conclude that the alterations proposed, individually or in combination with other plans or projects, would not be likely to have a significant effect on the European sites in view of these sites conservation objectives.

1.0 Recommendation

I recommend that the Board decides that the proposed modifications subject of this request do not constitute the making of a material alteration of the terms of the development as permitted under ABP 310798-21.

DRAFT ORDER

REQUEST received by An Bord Pleanála on the 3rd day of April 2023 from EirGrid under section 146B of the Planning and Development Act, 2000, as amended, to alter the terms of a strategic infrastructure development described as proposed alterations to the previously approved Celtic Interconnector Project and associated works, subject of a permission under An Bord Pleanála Reference Number ABP 310798-21

WHEREAS the Board made a decision to grant the proposed development, subject to conditions, for the above-mentioned development by order dated the 19th day of May, 2022.

AND WHEREAS the proposed alteration is described as follows:

AND WHEREAS the Board decided, in accordance with section 146B(2)(b) of the Planning and Development Act 2000, as amended, not to invite submissions or observations from the public in relation to whether the proposed alteration would constitute the making of a material alteration to the terms of the development concerned,

AND WHEREAS the Board decided, in accordance with section 146B(2)(a) of the Planning and Development Act 2000, as amended, that the proposed alterations would not result in a material alteration to the terms of the development, the subject of the approval,

AND WHEREAS having considered all of the documents on file and the Inspector's report, the Board considered that the making of the proposed alteration would not be likely to have significant effects on the environment or on any European Site,

NOW THEREFORE in accordance with section 146B(3)(a) of the Planning and Development Act, 2000, as amended, the Board hereby alters the abovementioned decision so that the approved development shall be altered in accordance with the plans and particulars received by An Bord Pleanala on the 3rd day of April, 2023, for the reasons and considerations set out below.

MATTERS CONSIDERED

In making its decision, the Board had regard to those matters to which, by virtue of the Planning and Development Acts and Regulations made thereunder, it was required to have regard.

REASONS AND CONSIDERATIONS

Having regard to:

- the nature and scale of the Celtic Interconnector Project and specifically the substation element works at Knockraha permitted under An Bord Pleanala Reference Number ABP 310798-21 for this site, which includes 400kV and 220kV Air Insulated Switchgear (AIS) equipment, 400/220kV transformer, lightning protection poles (max height of 20m), a small relay room, access track and associated works,
- the limited nature and scale of the alterations when considered in relation to the overall permitted development,
- the absence of any significant new or additional environmental concerns arising as a result of the proposed alterations, and
- the report of the Board's inspector, which is adopted,

It is considered that the proposed alterations would not be material. In accordance with section 146B(3)(a) of the Planning & Development Act, as amended, the Board hereby makes the said alterations.

Sarah Lynch

Senior Planning Inspector

6th June 2023