



An
Bord
Pleanála

Inspector's Report

ABP-318204-23

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| Development | Grid stability service development and associated site works. |
| Location | Great Island Power Station, Great Island, Campile, New Ross, Co. Wexford |
| Planning Authority | Wexford County Council |
| Planning Authority Reg. Ref. | 20230871 |
| Applicant(s) | SSE Generational Ireland Ltd. |
| Type of Application | Permission |
| Planning Authority Decision | Grant |
| Type of Appeal | Third Party |
| Appellant(s) | Pat Moran |
| Observer(s) | None |
| Date of Site Inspection | 8 th August 2024 |
| Inspector | Catherine Dillon |

1.0 Site Location and Description

- 1.1. The subject site is located in the north eastern corner of the Great Island Power Station site in Campile, New Ross, Co.Wexford. The Power Station site is located on at the confluence of the River Suir and River Barrow estuary and is approximately 3.5km west of Campile. The Power Station site is next to a 220kv transmission line and substation. The vehicular access to both the subject site and the Power Station is via a private road shared with the Greenlink Interconnector Station site (to the north east of the subject site) and is accessed off the L4033 which serves a number of detached rural dwellings.
- 1.2. The subject site is at a higher level than the vehicular access to the north and falls from west to east across the site (c.4m). It is enclosed with palisade fencing and is currently occupied by several portacabins and storage containers that are being used as a temporary storage/equipment compound for on-going construction works at the Power Station and adjoining Greenlink Converter Station site. On the western side of the site there is a 150mm diameter watermain. There is a gas supply pipeline for the power plant to the east of the site boundary.
- 1.3. The former Waterford to Rosslare/Wexford railway link runs parallel to the north of the site. To the east is the Greenlink Interconnector Station and agricultural lands further east. To the west of the site is a reservoir.
- 1.4. The nearest watercourse to the subject site application is the Newtown Stream (EPA Ref. Newtown 14), approx. 400m east of the site boundary at the nearest point. The wider surrounding area, outside the Great Island Power Station, is predominantly rural in nature and defined by a coastal and agricultural character.
- 1.5. The subject site has a stated area of 3.162 hectares and is a Lower Tier Seveso site.

2.0 Proposed Development

- 2.1. The proposed development comprises a 10 year permission and would be located in the north eastern corner of the subject site and connect to an existing substation on the southern section of the site. It would comprise the following:
 - Construction of a grid Stability Service development and all associated site clearance development works comprising the following:

Synchronous Condenser (SC) building:

- The SC would be housed within a building which would have an overall floor area of 450m² and maximum height of 13.1m. The building would contain a ventilation unit, cooling pump, flywheel, vacuum skid and generator.
- It is stated the purpose of the SC is to stabilise the voltage of electrical power systems and prevent power outages or other disruptions and stabilise the voltage to the grid. In design a SC is a rotating electrical machine that uses a flywheel and resembles a generator used to prevent power surges or outages within the power grid system. There is no combustion and no emissions from the SC.

Modular Containers and associated structures:

- Eight elevated modular containers are proposed to house electrical and control equipment and all associated plant/apparatus including:
 - (a) 1 structure to contain equipment and battery containers,
 - (b) 1 generator circuit breaker structure,
 - (b) 2 transformer structures;
 - (c) 1 outdoor cooler structure;
 - (d) 1 no. emergency diesel generator;
 - (e) firewater tank and pumphouse;
- Underground cabling (including a 165m connection to the existing substation), and all associated above ground cabling, piping and electrical connections;
- Perimeter fencing around the site and 2 no. gates;
- A portaloo is proposed for the construction period of works
- All associated site development works including hardstanding, drainage, gabion wall, and landscaping.

Drainage

- Hardstanding areas are proposed to be permeable to allow rainwater to permeate to ground.

- Rainwater on impermeable areas would be directed to gullies connected to a new piped surface water collection system for the SC site to discharge to ground.
- Surface water from bunded areas would be piped to the new piped surface water collection system in the eastern end of the site and pass through an infiltration system before being discharged to ground.

The proposed site clearance works include the removal of a temporary portacabin and construction rubble from the site.

The adjoining Power Station site comprises an establishment which holds an Integrated Pollution Prevention and Control (IPPC) license and to which the major accident regulations apply.

- 2.2. A Planning Report, Appropriate Assessment screening report, Water & Drainage Report, Noise Impact Assessment report, preliminary Traffic Management Plan and outline Construction & Environmental Management Plan (CEMP), were submitted with the proposal.

3.0 Planning Authority Decision

3.1. Decision

- 3.1.1. On 20th September 2023 Wexford County Council granted planning permission for the development subject to 11 conditions. Conditions of note include the following:

Condition 2: 10 year permission from the date of the final grant.

Condition 3: Mitigation measures to comply with CEMP.

Condition 4: Development contributions towards in respect of works to the public roads.

Condition 5: Development Contributions towards the provision or improvement of community facilities in the functional area.

Condition 6: Dust limits not to exceed 350mg/m² per day.

Condition 7. Noise levels not to exceed 55dB(A) between 0700-2100 and 42dB(A) 2100-0700 Sundays and Bank holidays.

Condition 8. Pre-development archaeology testing.

Condition 10: Planting of hedging on the north and east boundaries.

- 3.1.2. An Advice Note was attached to this notification to grant which stated, that the granting of planning permission does not relieve the developer of the responsibility of complying with any requirements under an Integrated Pollution Control Licence from the EPA.

3.2. **Planning Authority Reports**

3.2.1. Planning Reports

The planning report dated 20/9/2023 considered the proposed development to be in line with the policies and objectives of the County Development Plan. The report noted where a permission relates to development that requires an IPPC licence, the control of emissions arising from the activity is a function of the EPA, and any conditions relating to emissions are relative to the construction and not the operation of the development.

3.2.2. Other Technical Reports

- 3.2.3. Senior Executive Scientist (Environment): Report dated 11/9/2023. No objections subject to conditions, including; no works to be carried out on site until response from EPA regarding licence Reg. No. P0606-04, noise and dust.

3.3. **Prescribed Bodies**

Inland Fisheries: No comments received.

Health & Safety Authority: Report dated 21/8/2023: Based on the information supplied the Authority does not advise against the granting of planning permission in the context of Major Accident Hazards at this period of time.

Failte Ireland: No comments received

ESB: No comments received.

An Taisce: No comments received.

E.P.A: No comments received by the P.A from the EPA.

Development Applications Unit: Report dated 5/8/2023. No objections subject to a programme of pre-development archaeological testing.

3.4. Third Party Observations

3.4.1. Three submissions were received to the planning application, with one of the submissions containing 19 signatures on the following summarised grounds:

- The plant is operating and continues to operate outside of its EPA licence (P0606-03).
- The EPA need to impose the 5 tonne limit of chlorine as annual tonnage is higher than this limit.
- Details regarding complaints from foaming of estuary from cooling water discharge from the plant to the EPA.
- Testing has shown there are excess limits of petroleum, hydrocarbons and suspended solids in the estuary.
- Issues relating to previous promises regarding upgrading the pier and slipway for the local community were not provided by the owners of the site.
- Degradation of the road network in the area by construction and employee traffic.
- Impact of noise from transformers in the area.
- Impact on roads and rubbish in the area.

3.4.2. The applicant's agent made a submission following the lodgment of the planning application stating SSE Generation Ireland Ltd had received a new Industrial Emissions Licence (Ref: P0606-04) from the EPA to carry out the combustion of fuels in installations with a total rated thermal input of 50 MW or more on 23rd August 2023.

4.0 Planning History

Subject site

- 4.1. **ABP Ref: PA0016:** On 29th July 2010, ABP granted planning permission planning under Section 37(e) of the Planning and Development Act, 2000, as amended to Endesa Ireland Ltd., for the construction of a CCGT power plant with an electrical output capacity of 430 MW within the confines of the existing power generating facility at Great Island, subject to 22 conditions. This site had a stated area of 8 hectares and was part of a more extensive landholding of approximately 58 hectares which forms the greater area of the existing Power Plant station. The subject site is included within the blue boundary of this development site.
- 4.2. This application was accompanied by an EIA and the development was subject to an Integrated Pollution Prevention and Control Licence. This plant began commercial operation in 2015. EPA licence Ref: P0606-04 granted on 23/8/2023 refers to this development.
- 4.3. **ABP Ref: 308906-20:** Greenlink Interconnector Ltd., applied to ABP under Section 182A of the Planning and Development Act 2000 (Strategic Infrastructure Development) as amended for a new convertor station, tail station, MV substation and 23km of high voltage direct current (HVDC) electricity cables, 420m of high voltage alternating current (HVAC) cables, 23.42km of fibre optic cable. It included the Irish onshore elements of a transboundary electricity interconnector to connect Great Island 220 kV substation in County Wexford and National Grid's Pembroke transmission substation in Pembrokeshire (Wales). This application was accompanied by an EIAR and NIS and was granted by ABP on 23/6/2021.
- 4.4. The convertor station is currently under construction to the east of the subject site. It will accommodate a 500MW nominal capacity station for the conversion between the HVAC and HVDC electrical currents. The subject site is included within the blue line boundary of this site.

Great Island Power Plant Planning History:

- 4.5. The overall Power Station site has been the subject of numerous planning applications of relevance are as follows:
- 4.6. **P.A Ref:20220628:** Planning permission granted to Solas Eireann 4 Ltd., on 6/7/2022 for development which consisted of grid connection infrastructure to connect the approved Ballyedock Solar Farm (PA Ref:20170330) to the existing Great Island Substation comprising the laying of underground cables, overhead

lines, associated infrastructure and Horizontal Directional Drilling. The development also included upgrades to the substation (previously consented under planning application reference 20170330) to align with the connection route to the national grid. A Natura Impact Statement was prepared in respect of the application for planning permission.

- 4.7. **P.A Refs: 20150975, 20151274, 20171117, 20180580, 20180581, 20191338 and 20230515:** These planning permissions were granted to either ESB or SSE Generation Ireland and relate to works granted at the Great Island Power Plant for various structures including alterations to cladding of structures, security building, car parking, fencing, support buildings and warehouse building.
- 4.8. To the north of the subject site:
- 4.9. **ABP 318914-24:** Kilmannock Battery Storage Ltd, applied to ABP under Section 182A of the Planning and Development Act 2000 (Strategic Infrastructure Development) as amended for a 110kV substation and 110kV underground grid connection. This application was accompanied by an EIAR and NIS and was granted by ABP on 5/6/2024.
- 4.10. To the west of the subject site
- 4.11. **P.A Ref:20221633/ & P Ref: 318103-23:** Current application for the development of a new 38kV electricity circuit between the existing Knockmullen ESB Substation, New Ross and the existing Great Island ESB Substation, within the Great Island generation station complex. The circuit traverses the townland of Great Island, and extends to the north towards Camlin and Knockmullin, County Wexford, will be c.13.75 km in length and will consist of c.12 km of overhead line (OHL) and c.1.75 km of underground cable (UGC). A Natura Impact Statement (NIS) has been submitted with this proposal.

5.0 Policy Context

5.1 Wexford Development Plan 2022-2028

- 5.2. The current Development Plan came into effect on 25th July 2022. The appeal was submitted under the provisions of this Plan. The subject site and Power Station lands are not zoned within this Plan. The Great Island Power Station is an

establishment which holds an Integrated Pollution Prevention and Control (IPPC) licence and to which the Major Accident Regulations apply. The site lies within a Lower Tier Seveso Site as identified in Table 10-2 of Volume 1 of this Plan.

- 5.3. The subject site lies within the Coastal Landscape Character Area of the River Barrow/Suir River valley as identified within the County Development Plan, and such landscapes have a high sensitivity to change and a limited ability to absorb new development. Development proposed within these areas must be shown not to impinge in any significant way upon their character, integrity or uniformity when viewed from the surroundings. Particular attention should be given to the protection of the character and distinctiveness of these areas as viewed from scenic routes and the environs of archaeological and historic sites.
- 5.4. The main policies and objectives are set out under Volumes 1, 2, 7 and 10 of this Plan. Relevant chapters in Volume 1 include: Chapter 2 (Climate Action), Chapter 9 (Infrastructure Strategy) Chapter 10 (Environmental Management), and Chapter 11 (Landscape & Green Infrastructure). Volume 2 relates to the Development Management Manual for planning applications and Volume 7 (Landscape Character Assessment) and Volume 10 (Energy Strategy of the County).
- 5.5. Volume 1

Chapter 9: Infrastructure Strategy

Objectives SWM01- SWM08: Relate primarily to an integrated approach to SuDS and nature based solutions for surface water and that all proposals should include a commensurate drainage assessment used to design the surface water management system for the site.

Objectives PT01- PTO4: Relate to the provision of and improvements to energy networks and infrastructure in principle, provided that they are assessed in accordance with the requirements of Article 6 of the Habitats Directive and do not have a significant negative impact on nearby residents and are subject to landscaping screening.

Chapter 10: Environmental Management

Objectives EM01-EM02: Relate to ensuring that planning permission will only be granted for a development proposal that, either individually or in combination with

existing and/or proposed plans or projects, will not have a significant effect on a European site.

Objective EM05 To implement the provisions of EU and National legislation and other relevant legislative requirements on protecting and improving surface and ground water quality, air quality and climate, and on reducing adverse noise and light nuisance, as appropriate and in conjunction with all relevant stakeholders in the interests of the protection of the environment, public health and the sustainable development of the county.

Objectives WQ01-WQ15: Protect existing and potential water resources within the county, in accordance with the EU Water Framework Directive (WFD).

Objective COMAH01 To control the following for the purposes of reducing the risk or limiting the consequences of a major accident (regard will be had to the provisions of the Major Accidents Directive and any regulations, under any enactment, giving effect to that Directive):

- The siting of Major Accident Hazard sites.
- The modification of an existing Major Accident Hazard site.

Objective COMAH02 To consult with and have regard to the technical advice of the Health and Safety Authority when preparing development plans and local area plans and assessing planning applications where the Major Accidents Directive and any associated regulations are relevant.

- Development in the vicinity of a Major Accident Hazard site as specified in the Planning and Development Regulations 2001 (as amended)

5.5.1. Chapter 11 Landscape & Green Infrastructure & Volume 7- Landscape Character Assessment

Objective L04: To require all developments to be appropriately sited, designed and landscaped having regard to their setting in the landscape, ensure that any potential adverse visual impacts are minimised and that natural features and characteristics of the site are retained.

Objective L05: To ensure that developments are not unduly visually obtrusive in the landscape, in particular, in or adjacent to the Upland, River Valley, Coastal or Distinctive Landscape Character Units.

5.6. Volume 2: Development Management

Section 6.2.6 Siring & Design of Access/Egress points

Section 7.1 Archaeology

Section 7. 4 Landscape & Biodiversity

Section 8.2.1 Surface Water Management

Section 8.2.2 Ground Water Management

Section 8.3: Wastewater

Section 8.4 Air Quality

Section 8.5 Lighting

Section 8.6 Major Accidents Directive/ Seveso Establishments

5.6.1. Volume 10: Energy Strategy- Section 8.4 Energy Storage

Objective ES35: To facilitate the provision of and improvements to energy networks in principle, provided that it can be demonstrated that:

- The development is required in order to facilitate the provision or retention of significant economic or social infrastructure
- The route proposed has been identified with due consideration for social, environmental and cultural impacts
- The design is such that will achieve least environmental impact consistent with not incurring excessive cost
- Where impacts are inevitable mitigation features have been included
- Proposals for energy infrastructure should be assessed in accordance with the requirements of Article 6 of the Habitats Directive

Objective ES37: To facilitate the development of Battery Energy Storage Systems and other energy storage technologies such as air storage and synchronous condensers at appropriate locations to ensure a reliable and secure energy supply, subject to normal planning and environmental criteria, including residential and visual impacts.

5.7. Regional Policy Context

5.7.1. Regional Spatial and Economic Strategy (RSES) for the Southern Region 2040

The following Regional Policy Objectives are noted:

- RPO1: Environmental Assessment (a) Any reference to support for all plans, projects, activities and development in the RSES should be considered to refer to 'environmentally sustainable development' that has no adverse effects on the integrity of European sites and no net loss of biodiversity, that shall be subject to appropriate feasibility studies, best practice site/route selection (to consider environmental constraints such as landscape, cultural heritage, the protection of water quality, flood risks and biodiversity as a minimum), environmental assessment including EclA to support development management and where required, the completion of statutory SEA, EIA and AA processes as appropriate.
- RPO 87: relates to a low carbon energy future.
- RPO 90: addresses regional decarbonisation.
- RPO 96: to support the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure ...to meet increased demand as the regional economy grows.
- RPO 98: supports the development of a Regional Renewable Energy strategy.
- RPO 100: to support the integration of indigenous renewable energy production and grid injection.
- RPO 219: to support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers.
- RPO 222: to support the development of a safe, secure and reliable supply of electricity and to support and facilitate the development of enhanced electricity networks and facilitate new transmission infrastructure projects.

5.8. National Policy Context

5.8.1. National Planning Framework (NPF)

- 5.8.2. The NPF is a high-level strategic plan to shape the future growth and development of the country to 2040. It is focused on delivering 10 National Strategic Outcomes (NSOs). It is stated in the NPF that It is stated in the NPF that “New energy systems and transmission grids will be necessary for a more distributed, renewables-focused energy generation system, harnessing both the considerable on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy to the major sources of demand.’
- 5.8.3. NSO 8 focuses on the ‘Transition to a Low Carbon and Climate Resilient Society’ and recognises the need to harness both on-shore and off-shore potential from energy sources including solar and deliver 40% of our electricity needs from renewable sources.
- 5.8.4. National Policy Objective (NPO) 55 seeks to ‘promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050’.

Climate Action and Low Carbon Development (Amendment) Act 2021

- 5.8.5. The Climate Act 2021 commits Ireland to a legally binding 51% reduction in overall greenhouse gas emissions by 2030 and to achieving net zero emissions by 2050. As part of its functions the Board must, in so far as practicable, perform its functions in a manner that is consistent with the most recent approved climate action plan, most recent approved national long term climate action strategy, national adaptation framework, sectoral plans, furtherance of the national climate objective and the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.

Government Policy Statement on Security of Electricity Supply, November 2021

- 5.8.6. The Policy Statement states that the Government has approved that it is appropriate for additional electricity transmission and distribution grid infrastructure, electricity interconnection and electricity storage to be permitted and developed in order to support the growth of renewable energy and to support security of electricity supply.

5.9. Natural Heritage Designations

The site is located proximate to the confluence of the River Suir and River Barrow.

The nearest designated sites are:

- River Barrow and River Nore SAC (site code: 002162) is c. 257m west from the site boundary.
- The Lower River Suir SAC (site code:002137) is c.1.4km from the western boundary of the site.
- Bannow Bay SPA (site code: 004033) is c.12km to the south east of the site.
- Bannow Bay SAC (site code: 000697) is c.11km to the south east of the site.
- Tramore Back Strand SPA (site code: 004027) is c.14.8km to the south west of the site.
- Tramore Dunes & Backstrand SAC (site code: 000671) is c. 14km to the south west of the site.
- Wexford Harbour and Slobs SPA (Site code: 004076) is c.38km to the east.

5.10. EIA Screening

The proposed development does not fall under a category of development listed in Schedule 5, Parts 1 or 2 of the Planning and Development Regulations 2001 (as amended). Having regard to the nature, scale and location of the proposed development, there is no real likelihood of significant effects on the environment and the need for an EIAR can be excluded at preliminary examination. Refer to Appendix 1 attached to this report.

6.0 The Appeal

6.1. Grounds of Appeal

- 6.1.1. A third party submission was received from Pat Moran on the following summarised grounds:

- Notes the application refers to an establishment which holds an IPPC licence and to which the major accidents regulations apply.
- The existing Power Plant cannot operate under the Best Available Techniques proposed in the submitted EIS relating to the original Power Plant development which has implications for the proposed development.
- Impact of chlorine concentration discharge on ecology and water quality in the River Barrow/Suir estuary, as sodium hypochlorite usage exceeds levels outlined in planning permission for the Power Plant.
- Attaches copies of letters issued to EPA regarding the existing Power Plant's non-compliance with EPA licence Ref: P0606-03 and the inability of the EPA to make a decision on Ref: P0606-04 to replace the former licence.
- Copy of letter from Fisheries Ireland dated 2007, regarding an EIS for a proposed development at the CCGT Power Plant Great Island, and the impact of the proposed abstraction and discharge of cooling water on all fish species during all operating conditions.
- Refers to Kilkenny Cheese development.

6.2. Applicant Response

6.2.1. The Applicant has responded to the third party submission and notes that they actively engaged with residents and that the issues raised by the third party do not pertain to the current planning application under consideration, but the quantities of sodium hypochlorite produced in the original planning application for the power station. They therefore respectfully request the appeal is dismissed in accordance with Section 138(1)(a)(i) of the Planning and Development Act 2000 , as amended.

- Outlines the strategic importance of the development to deliver a flexible system to support renewables in accordance with the Climate Action Plan 2023.
- Although the EPA issued a new Industrial Emissions Licence to SSE Generation Ireland on 23rd August 2023 (Ref: P0606-04), this is not a relevant consideration in the current appeal.

- Proposed development does not involve any discharge of water directly to any watercourse or drainage system into Waterford harbour.
- The EIS, letter from Southern Regional Fisheries Board, photographs and letters to the EPA referred to in the third party submission, relate to a previous planning application at The Great Island Power Station and not the current proposed development.

6.3. Planning Authority Response

None

6.4. Statutory Bodies

6.4.1. The Environmental Protection Agency (EPA) did not respond to the planning application. An Bord Pleanála consulted with the EPA on 12/9/2024, in respect of the proposed development.

6.4.2. A response was received from the EPA and provided the following summarised comments:

- SSE Generation Ireland was issued an Industrial Emissions (IE) Licence on 23rd August 2023 (Reg. No: P0606-04) for an activity under Class 2.1 of the EPA Act for the Combustion of fuels in installations with a total rated thermal input of 50MW or more.
- The proposed development boundary appears to be adjacent to and overlap with the installation boundary for P0606-04.
- The licence may need to be reviewed or amended to accommodate the changes proposed in the planning application.
- The licence application was accompanied by an Environmental Impact Statement (EIS), and details of the licence are available on the EPA website.
- With regards to the function of the EPA and considering the activity in its entirety the Agency notes that the activity to which the planning application and licence relates may be of the following type listed in Schedule 5 of the Planning and Development Regulations 2001 as amended: *Part 1, Project*

2(a) A thermal power station or other combustion installation with a heat output of 300 megawatts or more. If this is the case, EIA may be required (if the development is likely to have significant effects on the environment).(Emphasis by EPA).

- Should ABP determine an EIA is required for the development and should a licence review application be received which addresses the changes proposed, the Agency will require the associated EIAR be submitted in support of the licence review application.
- The Agency shall ensure that before the revised licence is granted it will be subject to an EIA as respects the matters that come within the functions of the Agency and in accordance with Section 83 (2A) and Section 87 (1G) (a) of the EPA Act.

7.0 Assessment

7.1.1. Having examined the application details and all other documentation on file and the reports of the Planning Authority, including all of the submissions received in relation to the application, having inspected the site, and having regard to relevant local/regional/national policies and guidance, I consider that the main issues in the planning assessment are as follows:

- Development Location and Planning Policy;
- Residential Amenity;
- Landscape;
- Drainage, and
- Other Issues.

7.2. Development Location and Planning Policy

7.2.1. The subject site forms part of the larger SEE Great Island Power Station site which opened in 2015, and the development would be located adjacent to the recently permitted Greenlink Interconnector development. There have been no historic industrial or power related uses on the subject site. The proposed Synchronous

Condenser (SC) would enable an increased integration of renewable energy power into the Irish grid by providing sufficient inertia for frequency support, short circuit power for system strength and reactive power for voltage control. The proximity of the proposed development to the existing power station and interconnector development would be in a location where stability demand is required.

- 7.2.2. The NPF states that new energy systems and transmission grids will be necessary for a more distributed, renewables-focused energy generation system. NPO 55 of the NPF promotes renewable energy use and generation at appropriate locations, to meet national objectives towards achieving a low carbon economy by 2050. Regional Policy Objective (RPO 219) of the RSES of the Southern Region seeks to support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers to ensure the energy needs of future population and economic expansion within designated growth areas across the Region, delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs.
- 7.2.3. Objective ES37 of the Wexford CDP, supports the advancement of renewable energy storage technologies such as synchronous condensers in maintaining grid stability at appropriate locations to ensure a reliable and secure energy supply, subject to normal planning and environmental criteria, including residential and visual impacts. I will discuss the residential and visual impacts of the proposed development in the following sections of this report. The environmental aspects of the development will be discussed in the AA section of this report.

Conclusion

- 7.2.4. The proposed development would be situated in an established industrial site and would integrate with the existing use and infrastructure at the site. Both local and national policy supports new technologies and solutions to transition to a low carbon economy, and it is considered the proposed development would support the transition from non-renewable to renewable sources of energy within the national grid. The proposed SC building and associated buildings and equipment would be located in the northeastern corner of the overall site and would generally be of a much smaller size and scale to the existing structures on the site. I therefore

consider the proposed development is appropriate in this location and would comply with local and national planning policy.

7.3. Residential Amenity

Noise

- 7.3.1. The first party did not raise issues regarding residential amenity, however Objective ES37 of the Wexford CDP requires any impact from SCs to be assessed for residential impact. A noise report was submitted with the planning application, and I note the Planning Authority had no concerns in this regard subject to noise levels not exceeding 55dB(A) during the hours 0700-2100 and 42dB(A) at nighttime. Noise levels were not to be impulsive in nature and any tonal element was not to exceed 5d(B)A above existing frequencies. The closest dwellings to the subject site are located c.420m to the north and 450m to the northwest separated from the subject site by the disused railway line. It is proposed to construct a gabion retaining wall and perimeter berm to the north of the SC building. The submitted documentation states the SC building would be constructed from steel sheet filled with mineral wool and would be sound insulated.
- 7.3.2. Noise measurements were taken once over a 24 hour period in July, to determine a typical snapshot of the existing noise climate. Average daytime levels at the residential properties were between 48-53dB(A) during the day and between 32-34d(B)A during the night with periodic vehicular traffic, construction and agricultural farm machinery being the major contributors to the average noise levels during the day.
- 7.3.3. The main noise producing element of the proposed development would be the proposed condensing unit inside the SC building. The average noise emission levels predicted from the SC building at the nearest sensitive receptors would be in the range of 28-36d(B) $L_{Aeq,T}$, which would be below the measured average noise levels at the 2 nearest sensitive receptors during both the day and night time. Although the noise levels could be audible at the nearest receptor point during quiet periods, I am satisfied the predicted noise levels emissions from the proposed development would be acceptable and would comply with typical limit values for noise from licensed sites as specified in the EPA's 'Guidance Note for Noise: Licence Applications, Surveys

and Assessments in Relation to Schedule Activities (NG4)' (2106) and would be within 55d(B) $L_{A,r,T}$ daytime and 45dB $L_{Aeq,T}$ at night.

Traffic

- 7.3.4. The subject site would be accessed via an existing local road (Newtown) that serves the Great Island Power Plant. This is a single carriageway width road (5.5m) with grass verges on either side and connects to the R733 which further links to the N25. It is typical of a rural road and is lightly trafficked serving a number of single dwellings along the road and the Power Station with a 50kph speed limit in operation. There is an internal road that leads to the subject site within the Power Plant site that runs parallel to the railway track.
- 7.3.5. The planning application was accompanied by a preliminary traffic management plan and an outline Construction and Environmental Management Plan (CEMP) report setting out the management during the construction and operational phase of the development. The construction phase is anticipated to last 18 months and most of the construction material would be delivered to site using HGVs, with the exception of larger pieces of equipment such as the generator, flywheel and transformer. It is envisaged the development of the compound would generate a maximum of 30 trips per day. Once operational the SC would be controlled remotely and would not therefore generate any additional employee traffic. The subject site lies within a rural area and although the local road into the site is narrow and a certain section would not permit HGV vehicles to pass oncoming traffic, signage would be erected during the construction phase stating HGVs are to give way to oncoming traffic and contractors would be required to liaise with representatives of the local community.
- 7.3.6. The applicant states that regular condition surveys of the road network in the vicinity of the site would be carried out including, road sweeping, dust management, and staff and suppliers would be required to adhere to the construction traffic management plan. The Planning Authority had no concerns regarding traffic or road maintenance within the planner's report, subject to a financial contribution being made by the applicant towards the provision or improvement of the public roads in the area.
- 7.3.7. I consider traffic relating to the construction of the development would be for a temporary period only, and that the applicant has demonstrated that adequate

protection of the existing local road network would take place. Notwithstanding this, if the Board are minded to grant planning permission, I consider there would be an increase in traffic experienced along the rural roads during the construction of the development and I recommend a condition be attached, as per condition 4 of the P.A's notification to grant requiring a financial contribution to ensure the developer is responsible for the upkeep and maintenance of the roads in the vicinity of the site.

Dust

- 7.3.8. I note the planning authority attached a condition limiting dust emissions to 350mg/m² per day, and particulate matter to be no greater than PM₁₀. No dust monitoring was carried out as part of the proposed application however, I do not consider the proposed operation of the development is a dust generating activity. The construction phase is proposed to take a period of 18 months, and following the completion of the development, I would not envisage any dust to arise. I therefore consider this condition is unnecessary, particularly given the separation distance from the development and residential neighbouring properties. Any dust from construction traffic would be controlled in an agreed construction management plan with the planning authority.

Conclusion

- 7.3.9. I consider the proposed development would not have a significant impact on the residential amenity in the immediate area, in terms of noise, traffic or dust.

7.4. Landscape & Visual Impact

- 7.4.1. The subject site lies within the River Valley Landscape Character Area of the Barrow/Suir River valley as designated in the CDP Landscape Character Assessment of the County. The River Valley designations within the county have a "moderate" to "high" sensitivity rating. Objectives L03 and 4 of the CDP require all developments to be sited, designed and landscaped having regard to their setting, not to be unduly visually obtrusive, and in river valley landscapes an overriding need is demonstrated for that particular development and ensure that careful consideration is given to site selection. The subject site is located in an existing brownfield site and is positioned to the north east of the overall site, furthest from the estuary.

7.4.2. The scale and design of the proposed buildings and plant equipment would be integrated and subsumed within the overall site and would be screened by the existing structures on the site from the estuary. The development would be screened to a large extent from the neighbouring residential properties by the existing boundary screening and railway track to the north. I note the P.A attached a condition regarding specific landscaping along the north and eastern boundaries, and would recommend in the event the Board are minded to grant planning permission a similar condition is attached.

Conclusion

7.4.3. I consider the proposed development would not be unduly visually obtrusive in the landscape or have a negative impact in the River Barrow/Suir River Valley landscape and visual amenity of the area, subject to further landscaping along the north and east boundaries along the embankment area.

7.5. **Drainage**

7.5.1. The applicant states during the construction stage of the development waste-water/ effluent would be managed and controlled at the temporary site compound through the use of welfare units with storage tanks, where sanitary waste would be removed from the site via a licensed waste disposal operator. There would be no requirement for welfare facilities during the operational stage as it would be manned remotely.

7.5.2. Surface water during the construction phase of the development would continue to percolate to ground. There are no watercourses at the site and construction stage run off would be not be discharged the existing stormwater network at the Power Plant site.

7.5.3. During the operation phase of the development surface water run off would be collected via a new stormwater drainage network at the site (with associated bunds, sumps and hydrocarbon interceptor) which would discharge into a new proposed infiltration area. The infiltration trench would be 20m long by 4m wide and 5m deep and would be set in from the eastern boundary of the site. The soakaway storage volume would be 202.5m³, allowing for a 1 in 100 year rainfall and 10% increase due to climate change. This would exceed the required 140.39m³ surface water run off volume required for the site. A BRE 365 test was carried out at the site in 2017, and

the water table was not encountered during the trail hole test. I note ground water body Adamstown which includes the subject site is good and not at risk. The transitional water body Lower Suir Estuary (Little Island Cheekpoint) is currently of 'moderate' status and is at 'risk' of not meeting its WFD objectives. Surface water would percolate to ground via the soakaway percolation trench and there would be no discharge to the estuarine transitional waterbodies.

Conclusion

- 7.5.4. There would be no foul drainage provided on site and the proposed development would discharge all surface water to groundwater. The site is not subject to flooding and the proposed infiltration trench has been designed to accommodate all surface water run-off from the proposed structures and allows for climate change factors.

7.6. Other issues

- 7.6.1. The third party has made reference to an EIS and EPA licence relating to a previous planning application at the Great Island Power Plant site and the non-compliance of an EPA licence Ref: P0606-03 but is not specific regarding the particular planning application to which he refers. The third party is particularly concerned about the quantities of biocide (Sodium Hypochlorite¹) being released from the existing power plant and its impact on the estuary. However, issues regarding planning enforcement matters and non-compliance with an EPA licence are not within the remit of the Board.
- 7.6.2. The licence granted by the EPA Reg: P0606-4 (accessed 13/11/2024) related to a 795MW gas fired combined gas turbine (CCGT) power station located at Great Island, which entered commercial operation in 2015, replacing the former oil fired station at the site. The subject site was included within the blue line of this licence application and the northeastern corner of the subject site was included within the red line boundary.
- 7.6.3. This licence was accompanied by an Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) and placed standard conditions on controls for emissions to air, noise, storm water discharges, storage and

¹ Sodium hypochlorite (NaOCl) is used as a biocide in the cooling water system of the power station.

management of wastes and emissions to surface water. The Agency were satisfied that no reasonable scientific doubt remains as to the absence of adverse effects on the integrity of those European Sites River Barrow and River Nore SAC (Site Code: 002162) and Lower River Suir SAC (Site Code: 002137). All activities which are directly associated with, and technically connected to the licensed activity, whether operated by the licensee or by another party, shall be subject to the conditions of this licence, and the licensee shall bear full responsibility for any breach of these conditions.

- 7.6.4. Section 7.8.4 of the Department of Environment, Heritage & Local Government Guidelines on Development Management recommend, the Board, in granting permission for an activity licensable by the Environmental Protection Agency, may not impose conditions relating to the control of emissions from the activity, or to the control of emissions following the cessation of the operation of the activity.
- 7.6.5. The adjoining substation to which the proposed development would connect to was granted planning permission in 2010 under ABP Ref: PA0016 and has been in operation for many years and was subject to an EIA. The proposed development, which includes c.165m of cabling, does not fall within a category of development listed in Schedule 5, Parts 1 or 2 of the Planning and Development Regulations 2001 as amended which would require an Environmental Impact Assessment (EIA). The development is not considered sub-threshold, and a mandatory EIA is not required.
- 7.6.6. I therefore consider the development the subject of this appeal is an ancillary use to the overall licensed Power Plant station and would not when considered either 'alone' or 'in combination' with the existing power plant, have a significant direct or indirect effect on the environment, and an EIA is not required for the proposed development.
- 7.6.7. I note the P.A have attached an archaeological condition following the Development Applications Unit's comments on the planning application. I therefore recommend in the event are Board are minded to grant planning permission a similar condition is attached.

8.0 Appropriate Assessment Screening

- 8.1.1. I have considered the project in light of the requirements of Section 177U of the Planning and Development Act 2000, as amended. The subject site is located within an existing power plant site and the subject site's boundary is located approximately 257m east of the River Barrow and River Nore SAC (site code: 002162) and 1.4km east of the Lower River Suir SAC (site code:002137).
- 8.1.2. The proposed development comprises the construction of a grid stability service development which would contain a Synchronous Condenser building and a total of 8 modular containers associated with the development, underground cabling to connect to the existing substation and ancillary works.
- 8.1.3. Having considered the nature, scale and location of the proposed development, I am satisfied that it can be eliminated from further assessment because there is no conceivable risk to any European site. The reason for this conclusion is as follows:
- The proposed development is on brownfield lands within an existing established Power Plant site, and therefore there would be no in combination effects with the Power Station.
 - I note that there are no direct hydrological connections between the subject site and any European site.
 - Having regard to the separation distance from the European sites regarding any other potential ecological pathways and intervening lands.
 - The site is not used on an ex-situ basis for Qualifying Interests.
 - No potential to spread invasive species.
 - All surface water is to be contained on site.
- 8.1.4. I conclude that on the basis of objective information, that the proposed development would not have a likely significant effect on any European Site either individually or in combination with other plans or projects.
- 8.1.5. Likely significant effects are excluded and therefore Appropriate Assessment (stage 2) (under Section 177V of the Planning and Development Act 2000) is not required.

9.0 Recommendation

In accordance with the foregoing, I recommend that permission be granted for the following reasons and considerations, in accordance with the following conditions.

10.0 Reasons and Considerations

The proposed development comprising the development of a synchronous condenser grid support facility which will connect to the adjoining substation at Great Island Power Station Plant would comply with the Climate Action and Energy policies contained in the Wexford County Development Plan 2022-2028, would have no significant effect on the environment or on residential amenity or on road and traffic safety, and would align with national policy to transition to carbon neutral energy, and would be in accordance with the proper planning and sustainable development of the area.

11.0 Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, 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 commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.

Reason: In the interest of clarity.

2. The development hereby permitted shall be carried out within 10 years of the date of this permission.

Reason: In the interest of clarity.

3. The development hereby permitted shall be removed from the site before the end of the period of 50 years from their commissioning, unless the period has been

extended by a further permission, and site shall be restored within 12 months of decommissioning.

Reason: In the interests of the proper planning and development of the area and to facilitate a review of the facilities at that time

4. Site development and building works shall be carried out only between the hours of 08.00 and 19.00 from Monday to Friday inclusive, between the hours of 08.00 and 14.00 on Saturdays, and not at all on Sundays, Bank or Public Holidays. Deviation from these times will only be allowed in exceptional circumstances where written approval has been received from the planning authority.

Reason: In the interest of amenity.

5. The developer shall be responsible for any damage to the public road.

Reason: In the interest of clarity.

6. Details of the materials, colours, and textures of the external finishes shall be submitted to and agreed in writing with the planning authority prior to the commencement of development.

Reason: In the interest of visual amenity.

7. Noise resulting from operations affecting nearby noise sensitive locations shall not exceed the background level by 10 dB(A) or more or exceed EPAs NG4 (Guidance Note for Noise: Licence Applications, Surveys and Assessments in Relation to Scheduled Activities) limits whichever is lesser (as measured from the facade of the nearest noise sensitive locations). Noise emanating from the development shall not exceed the following:
 - a) Daytime (0700-1900) 55 dB (LAeq,1 hour) LAeq during a specified time interval)
 - b) Evening (1900- 2300)- 50 dB LAeq, 1 hour, and
 - c) Night-time (2300- 0700)- 45 dB LAeq, 1 hour.

As measured from the facade of the nearest noise sensitive location. Clearly audible and impulsive tones at noise sensitive locations during the evening and night shall be avoided irrespective of the noise level.

Reason: To protect the residential amenities of property in the vicinity of the site.

8. The developer shall engage a suitably qualified licence eligible archaeologist (licensed under the National Monuments Acts) to carry out pre-development archaeological testing in areas of proposed ground disturbance and to submit an archaeological impact assessment report for the written agreement of the planning authority, following consultation with the National Monuments Service, in advance of any site preparation works or groundworks, including site investigation works/topsoil stripping/site clearance/dredging/underwater works and/or construction works. The report shall include an archaeological impact statement and mitigation strategy. Where archaeological material is shown to be present, avoidance, preservation in-situ, preservation by record [archaeological excavation] and/or monitoring may be required. Any further archaeological mitigation requirements specified by the planning authority, following consultation with the National Monuments Service, shall be complied with by the developer. No site preparation and/or construction works shall be carried out on site until the archaeologist's report has been submitted to and approval to proceed is agreed in writing with the planning authority. The planning authority and the National Monuments Service shall be furnished with a final archaeological report describing the results of any subsequent archaeological investigative works and/or monitoring following the completion of all archaeological work on site and the completion of any necessary post-excavation work. All resulting and associated archaeological costs shall be borne by the developer.

Reason: To ensure the continued preservation [either in situ or by record] of places, caves, sites, features or other objects of archaeological interest.

9. Measures shall be implemented to prevent the spread of Alien Invasive Species during construction works and control measures shall have regard to The Management of Noxious Weeds and Non-native Invasive Plant Species on National Roads (NRA).

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

10. The north and east boundary embankments shall be landscaped using a mix of indigenous hedging (holly, hawthorn, blackthorn, field maple) planted continuously in

double rows of 400mm intervals. A minimum of six mature indigenous tree species (maple, sycamore, silver birch, rowan, white beam, oak, chestnut) shall be included within the same boundaries. The boundary treatment and landscaping shall be carried out in accordance with the agreed scheme.

Any hedging or trees which die, are removed or become seriously damaged or diseased, within a period of five years from the completion of the development, shall be replaced within the next planting season with others of similar size and species, unless otherwise agreed in writing with the planning authority.

Reason: In order to screen the development and assimilate it into the surrounding rural landscape, in the interest of visual amenity.

11. Construction and demolition waste shall be managed in accordance with a construction waste and demolition management plan, which shall be submitted to, and agreed in writing with, the planning authority prior commencement of development. This plan shall be prepared in accordance with the “Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects”, published by the Department of the Environment, Heritage and Local Government in July 2006. The plan shall include details of waste to be generated during site clearance and construction phases, and details of the methods and locations to be employed for the prevention, minimisation, recovery and disposal of this material in accordance with the provision of the Waste Management Plan for the Region in which the site is situated.

Reason: In the interest of sustainable waste management.

12. The developer shall pay to the planning authority a financial contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the Development Contribution Scheme made under Section 48 of the Planning and Development Act 2000, as amended. The contribution shall be paid prior to the commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to any

applicable indexation provisions of the Scheme at the time of payment. Details of the application of the terms of the Scheme shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to the Board to determine the proper application of the terms of the Scheme.

Reason: It is a requirement of the Planning and Development Act 2000 that a condition requiring a contribution in accordance with the Development Contribution Scheme made under section 48 of the Act be applied to the permission.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

Catherine Dillon
Planning Inspector

28th November 2024

Appendix 1 - Form 1 EIA Pre-Screening

| | | | |
|--|----------|--|--|
| An Bord Pleanála Case Reference | | ABP Ref: 318204-23 | |
| Proposed Development Summary | | Grid stability service development including a Synchronous Condenser unit, 8 modular units and associated site works. | |
| Development Address | | Great island Power Station, Great island, Campile, New Ross, Co.Wexford. | |
| 1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (that is involving construction works, demolition, or interventions in the natural surroundings) | | Yes | X |
| | | No | No further action required |
| 2. Is the proposed development of a CLASS specified in Part 1 or Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended)? | | | |
| Yes | X | Part 2- Class 13. <i>Changes, extensions, development and testing</i> (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. | Proceed to Q3 |
| No | | | No further action required |
| 3. Does the proposed development equal or exceed any relevant THRESHOLD set out in the relevant Class? | | | |
| | | Threshold | Comment (if relevant) |
| No | X | | |
| Yes | | | |
| | | | Conclusion |
| | | | No EIAR or Preliminary Examination required |
| | | | Proceed to Q.4 |
| 4. Is the proposed development below the relevant threshold for the Class of development [sub-threshold development]? | | | |
| Yes | | The overall site to which the subject site forms a part is 8 hectares and was part of a more extensive landholding of approx.58 | Preliminary Examination required (Form 2) |

| | | |
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| | hectares. The subject site has an area of 3.162 ha. | |
| 5. Has Schedule 7A information been submitted? | | |
| No | X | Screening determination remains as above (Q1 to Q4) |
| Yes | | Screening Determination required |

Inspector: Catherine Dillon

Date: 28th November 2024

Form 2

EIA Preliminary Examination

| | |
|---|--|
| An Bord Pleanála Case Reference Number | ABP-318204-23 |
| Proposed Development Summary | Grid stability service development including a Synchronous Condenser unit, 8 modular units, an underground cable linking to the existing substation on site and associated site works |
| Development Address | Great island Power Station, Great island, Campile, New Ross, Co.Wexford. |
| <p>The Board carried out a preliminary examination [ref. Art. 109(2)(a), Planning and Development regulations 2001, as amended] of at least the nature, size or location of the proposed development, having regard to the criteria set out in Schedule 7 of the Regulations.</p> <p>This preliminary examination should be read with, and in the light of, the rest of the Inspector's Report attached herewith.</p> | |
| <p>Characteristics of proposed development</p> <p>(In particular, the size, design, cumulation with existing/proposed development, nature of demolition works, use of natural resources, production of waste, pollution and nuisance, risk of accidents/disasters and to human health).</p> | <p>The site is 3.16 hectares and has a modest footprint and equates to 5% of the overall site area of the Great Island Power Plant site.</p> <p>The development would involve the demolition of an existing temporary portacabin with a floor area of 180m² and the construction of a Synchronous Condenser (SC) building and an additional 8 modular buildings to house electrical and control equipment with a total floor area of 805m². The SC building would be connected to the existing ESB substation on site. Associated works would include hardstanding, drainage, gabion wall and landscaping.</p> <p>Construction activities would require the use of potentially harmful materials, such as fuels, concrete and other such substances and give rise to waste for disposal. Such wastes would be typical of construction sites. Noise and dust emissions during construction are likely. Such construction impacts would be localised and temporary in nature and implementation of a CEMP would satisfactorily mitigate potential impacts.</p> <p>During the construction stage of the development surface water would continue to percolate to ground but would not discharge into the existing</p> |

| | |
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| | <p>stormwater network serving the Power Plant site, or to drains leading to the estuary.</p> <p>Surface water run-off from hardstanding areas and bund sumps would be collected by a new surface water drainage network at the site that would discharge into a proposed new soakaway infiltration trench, to the east of the site and percolate to ground, and there would be no significant effects.</p> <p>Temporary welfare facilities are proposed during the construction phase and waste is to be removed by a registered waste management company. On completion the development would be operated remotely, and there would be no need to provide for wastewater management.</p> <p>The development does not require the use of substantial natural resources or give rise to significant risk of pollution or nuisance, and does not pose a risk of major accident and/or disaster. It presents no risks to human health.</p> <p>The site is located on a Lower Tier Serveso site and is regulated by the Control of Major Accident Hazards Regulations. The development is not exceptional in the context of the existing Power Plant facility.</p> |
| <p>Location of development</p> <p>(The environmental sensitivity of geographical areas likely to be affected by the development in particular existing and approved land use, abundance/capacity of natural resources, absorption capacity of natural environment e.g. wetland, coastal zones, nature reserves, European sites, densely populated areas, landscapes, sites of historic, cultural or archaeological significance).</p> | <p>There are no ecologically sensitive locations in the immediate vicinity of the subject site. The River Barrow & River Nore SAC (site code: 002162) is c.257m from the western boundary of the site, and the Lower River Suir SAC is c.1.4m from the western boundary of the site. Newtown Stream lies 400m to the east of the site. Although there is an existing stormwater drainage network associated with the wider Power Plant site, it is not present within the subject site. There are no water courses such as drains within the subject site that could carry silt laden or contaminated run off into the wider area or estuary.</p> <p>The appeal site is previously developed brownfield land. Having regard to the scale of the proposal, intervening land uses and separation distance, the proposed SuDS measures and CEMP, there is no potential to significantly impact on the ecological sensitivities of these European sites or other significant environmental sensitivities in the area.</p> <p>There are a cluster of archaeological monuments WX039-028004 and WX039-028, to the north</p> |

| | | |
|--|--|-------------------------|
| | <p>west of the site and north of the railway line. The site has been substantially developed but does have the potential to yield archaeological remains subsurface, which at present show no above ground register. Prior to any development a pre archaeological testing would be required..</p> <p>Having regard to the scale of the proposal within the wider Power Plant site, the proposed SuDS measures and CEMP, there is no potential to significantly impact on the ecological sensitivities of these European sites or other significant environmental sensitivities in the area.</p> | |
| <p>Types and characteristics of potential impacts (Likely significant effects on environmental parameters, magnitude and spatial extent, nature of impact, transboundary, intensity and complexity, duration, cumulative effects and opportunities for mitigation).</p> | <p>Having regard to the modest nature of the proposed development, its location removed from sensitive habitats and water courses, the likely limited magnitude and spatial extent of effects, and absence of in combination effects, there is no potential for significant effects on the environmental factors listed in section 171A of the Act.</p> | |
| <p>Conclusion</p> <p>The appeal site is a brownfield land within a large Power Plant site. Given the relatively small scale of the development and its industrial location, cumulative impacts are considered to be slight, neutral and temporary/short term, during the demolition phase; none are expected during the construction phase or operational phase. The HSA did not advise against the granting of the development in the context of Major Accident hazards.</p> | | |
| <p>Likelihood of Significant Effects</p> | <p>Conclusion in respect of EIA</p> | <p>Yes or No</p> |
| <p>There is no real likelihood of significant effects on the environment.</p> | <p>EIA is not required.</p> | <p>Yes</p> |
| <p>There is significant and realistic doubt regarding the likelihood of significant effects on the environment.</p> | <p>Schedule 7A Information required to enable a Screening Determination to be carried out.</p> | <p>No</p> |
| <p>There is a real likelihood of significant effects on the environment.</p> | <p>EIAR required.</p> | <p>No</p> |

Inspector: _____

Date: _____

DP/ADP: _____

Date: _____

(only where Schedule 7A information or EIAR required)

Appendix 2: Appropriate Assessment Screening

Appropriate Assessment Stage 1 Screening Determination

Description of the project:

I have considered the proposed residential development in light of the requirements of section 177U of the Planning and Development Act 2000, as amended. A Stage 1 Screening for Appropriate Assessment has been prepared by Kelleher Ecology Services Ltd on behalf of the applicant and informs this screening determination.

Subject Site:

I have provided a description of the site and the proposed development in Sections 1 and 2 of my report and details of the specifications of the proposal are provided in the AA screening report and other planning documentation provided by the applicant.

The subject site is located in the northeastern corner of the Great Island Power Station complex. The Power Station is located immediately to the north and east of the River Barrow at the confluence with the River Barrow and the River Suir. The subject site is currently enclosed with palisade fencing and is being used as a temporary storage/equipment compound and is brownfield in nature with some vegetated areas that are dominated by scrub and recolonising bare ground.

The site is on an elevated site made up of filled soil on Flood Zone C. It is located on an aquifer classified as regionally important fissured with extreme vulnerability. The overall area is surrounded by medium to high vulnerability and in an area with rock at or near surface. The site lies within the Adamstown catchment waterbody which is classified under the WFD as 'not at risk, with overall groundwater status as 'good' in WFD 2016-2021.' (accessed from watercatchments.ie 15/11/2024).

There is no watercourse at the site and the nearest water features relate to the estuarine transitional water bodies of the Rivers Barrow & Suir. Under the Water Framework Directive (WFD) the Groundwater body status of the site (GW2016-2021) IE_SE_G_001 is good.²

The nearest watercourse to the application is the Newtown Stream (EPA Ref. Newtown 14), approx. 400m east of the site boundary at the nearest point and flows into the River Barrow. The wider surrounding area, outside the Great Island Power Station, is predominantly rural in nature and defined by an agricultural character and coastal location.

Project:

The project relates to the proposed construction of a new Grid Stability Service Development and all associated site clearance and site development works. The proposed development will consist of the provision of a Synchronous Condenser (SC)

² (Accessed <https://gis.epa.ie> 8/11/2024)

within a building circa 13 metres in height; elevated modular containers to house electrical and control equipment and all associated plant/apparatus including (a) a generator circuit breaker, (b) transformers, (c) outdoor cooler equipment; (d) underground cabling (including a 165m connection to the existing substation); (e) all associated above ground cabling, piping and electrical connections; (f) 1 no. generator and associated diesel tank; (g) firewater tank and pumphouse; (h) perimeter fencing and 2 no. gates; and (i) all associated site development works including hardstanding, drainage, gabion wall, and landscaping.

A drainage report was submitted with the proposal (DJF Engineering Services July 2023). It is proposed to discharge surface water from the SC building roof and hardstanding areas to ground. Test pits were carried out in accordance with BRE Digest 365 in 2017 which indicate the depth of the water table is likely to be greater than 5m below existing ground levels given the deep cutting to the north of the site for the railway line. Surface water flow rates were calculated based on Met Eireann rainfall data, 1 in 100 year return period and 10% for climate change.

External transformers and the outdoor cooler would be bunded with sumps and automatic pumps to pump out rainwater to adjacent gullies connected to the surface water system. External surface water from hardstanding gullies and gullies taking piped flows from the external bund sumps would pass a Class 1 Bypass Separator before discharge to ground. The application relates to an establishment which holds an Integrated Pollution Prevention and Control (IPPC) license and to which the major accident regulations apply.

The proposed development will support the transmission system voltage via a process based on varying excitation such that there is no combustion and no emissions associated with it.

Submissions & Observations:

Health & Safety Authority (HSA): On the basis of the information supplied, the HAS do not advise against the granting of planning permission in the context of Major Accidents Hazards. Future development around COMAH establishments has the potential to impact on the expansion of those establishments.

Environmental Protection Agency (EPA): At appeal stage the EPA were consulted by ABP. SSE generation Ireland Limited was issued with an Industrial Emissions (IE) Licence on 23/8/2023 for the following activity: Class 2.1 of the EPA Act Combustion of fuels in installations with a total rated thermal input of 50MW or more. The proposed development appears to be adjacent to and overlap with the installation boundary for licence P0606-04. The licence may need to be reviewed or amended to accommodate the changes

proposed in the planning application. The licence application pertaining to this licence P0606-04 was accompanied by an EIS.

With regards to matters that come with the functions of the Agency, and considering the activity in its entirety, the Agency notes that the activity to which the planning application and licence relates may be of the following type listed in Schedule 5 of the Planning and Development Regulations 2001(Part 1, Project 2(a) A thermal power station or other combustion installation with a heat output of 300 megawatts or more. If this is the case, EIA may be required (if the development is to have significant effects on the environment). Should ABP determine that an EIA is required for the development and should a licence review application be received which addresses the changes proposed, the Agency will require that the associated EIAR be submitted in support of the licence review application. The Agency shall ensure that before the revised licence is granted, the licence review application will be made subject to an EIA in accordance with Section 83 (2A) & Section 87 (1G) of the EPA Act.

Dept. of Housing, Local Government & Heritage (DHLG&H) Recommended pre-development archaeological testing. The issues raised are not of consequence to this appropriate assessment.

The planning authority undertook an appropriate assessment of the project, and having regard to the limited extent of the proposed works and the substantial distance to the nearest Natura 2000 sites, no element of the proposed project, alone or in combination, is likely to give rise to any impacts on natura 2000 sites and a Stage 2 AA was not required.

Inland Fisheries Ireland (IFI): Made no comment on the planning application.

The Senior Executive Scientist for the P.A had no objections to the proposal, subject to no works being carried out until a response was received from the EPA regarding Licence P0606-04, noise and dust emission conditions.

Third party appeal submission: In essence this submission refers to the existing Power plant regarding non-compliance with a previous licence Ref: P0606-03 and the inability of the EPA to make a decision on Ref: P0606-04 to replace the former licence.

Potential Impact Mechanisms from the project

Site Survey

An AA screening report was submitted with the planning application. A site walkover survey was carried out on 6th July 2023. Specimens of the non-native invasive Buddelja daviii shrub were occasionally noted within the study area. This invasive plant species has been assessed as risk of medium impact invasive species but is not currently listed as a species of which it is a legal offense to disperse, spread or otherwise listed as being of European

concern. No other non-native invasive plant species were noted at the subject site. The site lacks habitat features of ecological value for otter.

European Sites

The subject site is not located in a European site. Having regard to the source-pathway-model, the following European sites are identified as being within a possible zone of influence to the site. These are:

- River Barrow and River Nore SAC (site code: 002162) c. 257m west from the site boundary;
- Lower River Suir SAC (site code:002137) c.1.4km from the western boundary of the site;
- Bannow Bay SPA (site code: 004033) c.12km to the south east of the site,
- Bannow Bay SAC (site code: 000697) c.11km to the south east of the site,
- Tramore Back Strand SPA (site code: 004027) c.14.8km to the south west of the site,
- Tramore Dunes & Backstrand SAC (site code: 000671) c. 14km to the south west of the site.

Effect Mechanisms:

There are no protected habitats or species identified at the site and therefore the likelihood of any significant effect of the project on any European site due to loss of habitat and/ or disturbance of species can be reasonably excluded. The site does not support any habitat features of ecological interest that could be used on an ex-situ basis by QI species of any SPA. Any light spillage would be contained within the site. There is no hydrological connection between the project and any European site arising from wastewater or surface water.

The Lower River Suir flows into the River Barrow & River Suir SAC from the west and therefore the Qualifying Interests of this site would not be impacted by the proposed project. I also consider Bannow Bay SPA and SAC and Tramore Back Strand SPA and Tramore Dunes & Backstrand SAC can be reasonable excluded at the preliminary examination stage, due to there being no hydrological connection and the distances involved.

I consider the following impacts and effect mechanisms require examination for implications for a likely significant effect on European site, the Lower River Suir SAC.

- A) Surface water pollution during construction phase.
- B) Surface water pollution during operation phase

European Sites at risk

Table 1: European Sites at risk from impacts of the proposed project

| Effect Mechanism | European Site | Qualifying Interests | Distance | Connections |
|---|---|---|------------------------------------|--|
| A) Surface water pollution during construction phase. | River Barrow & River Nore SAC (site code: 002162) | Water habitats & species Estuaries [1130] Mudflats and sandflats [1140] Reefs [1170] | c.257m west from the site boundary | Indirect Newtown Stream (EPA Ref. Newtown 14), is approx. 400m east of the site boundary at the nearest point, it joins the River Suir downstream of the site. |
| B) Surface water pollution during operation phase. | Conservation Objectives To maintain & restore the conservation condition of the habitats and species for which the SAC has been designated | Salicornia Mud [1310] Atlantic salt meadows [1330] Mediterranean salt meadows [1410] Floating vegetation [3260] Dry heaths [4030] Hydrophilous tall herb fringe communities [6430] Petrifying springs [7220] Old sessile oak woods [91A0] Alluvial Forests [91E0] Desmoulin's Whorl Snail [1016] Freshwater Pearl Mussel [1029] White-clawed Crayfish [1092] Sea Lamprey [1095] Brook Lamprey [1096] River Lamprey [1099] Twaite Shad [1103] Salmon [1106] Otter [1355] Killarney Fern [1421] | | The site lies within the Adamstown Ground Waterbody (Code IE_SE_G_001), which is not at risk. The Barrow Suir Nore Estuary (code: IE_SE_100_0500) is currently of 'moderate' status and is also at risk of failing to meet the WFD objectives by 2027. |
| | | | | |

According to the Site Synopsis for the River Barrow & River Nore SAC, the estuary and the other E.U. Habitats Directive Annex I habitats within it form a large component of the site. Extensive areas of intertidal flats, comprised of substrates ranging from fine, silty mud to coarse sand with pebbles/stones are present. Good quality intertidal sand and mudflats have developed on a linear shelf on the western side of Waterford Harbour, extending for over 6 km from north to south between Passage East and Creadaun Head, and in places are over 1 km wide.

Mudflats & Sandflats and Muddy estuarine community are located to the south and east of the Power Plant site (Maps 3 & 4) and the current conservation status of this habitat is favourable, with the habitat stable or increasing subject to natural processes. The main threats to the site and current damaging activities include high inputs of nutrients into the river system from agricultural run-off and several sewage plants, over-grazing within the woodland areas, and invasion by non-native species. The spreading of slurry and fertiliser poses a threat to the water quality of the salmonid river and to the populations of E.U. Habitats Directive Annex II animal species within the site.

Construction Phase:

Surface water would percolate to ground, with no discharge to the existing stormwater network in the wider area of the Power Station site or any other water features such as drains leading to the estuary transitional waterbodies in the wider area. There is the potential for discharge to the nearest watercourse the Newtown Stream, c. 400m east of the site boundary which discharges into the River Barrow & River Nore SAC. However, in the absence of rivers, streams or drainage ditches on, or bounding, the appeal site, the uncontrolled hydrological connection between the SAC and site is indirect and extremely weak.

The scale of the development is not significant and the intervening land uses and the separation distance means that water quality in this European site would not be negatively affected by any pollutants such as silt, hydrocarbons etc. from demolition, site clearance and other construction activities, if such an event were to occur, due to dilution and settling out over such a distance.

An outline Construction & Environmental Management Plan submitted with the proposal includes Best Practice standard construction methods for managing construction surface water run off, including the covering of stockpiles, diverting run off from gullies and manholes, spillage avoidance, oil booms and soakage pads contained within the site. The CEMP is not designed or required to obviate, reduce or remedy any impact on the SAC.

Waste-water/foul effluent will be managed and controlled at the temporary site compound through the use of portaloos and welfare units with storage tanks, where sanitary waste will be removed from site via a licenced waste disposal operator.

Other waste will be collected and removed from site by a licensed operator where appropriate.

I note the underlying GSI underlying rock states the site is located on a rock at or near surface, close to an area of extreme vulnerability. The Transitional Waterbody WFD Status for the subject site is 'moderate' to at 'risk', however there is no discharge of surface water from the site.

I consider that the construction phase will not therefore result in significant environmental impacts that could affect European sites within the wider catchment.

Operational Phase:

Surface-water run-off arising from hardstanding elements and bund sumps will be collected by a new surface-water drainage network at site that will discharge into a proposed new soakaway infiltration trench at the eastern area of the study site, where it will percolate to ground. This infiltration trench has been designed to BRE 365 standards.

The external transformers and outdoor cooler will be bunded with sumps and pumps to pump out rainwater to adjacent gullies connected to the surface water system. The pumping of these bunds would be automatic, as the SC site will not be permanently manned and bunds cannot be checked prior to each dewatering. This will be achieved with level sensors and alarms. Discharge will be to a class 1 oil separator to accommodate any minor oil volumes prior to discharge into the SC compound surface water drains.

The emergency generator and fuel tank will be covered and bunded and all bunds will be designed in accordance with EPA guidelines. Spills and firewater from the SC building and the equipment inside it will be contained within the building. This is standard EPA guidance for such installations and not designed to obviate, reduce or remedy any effects on the SAC.

All surface water from hardstanding gullies and gullies taking piped flows from external bund sumps will go through a suitably sized Class 1 Bypass Separator with an oil alarm before discharge to ground water. Operational phase surface-water run-off will percolate to ground at site via soakaway infiltration trench with no discharge into the wider area including the estuarine transitional waterbodies with associated Natura 2000 site.

As it will be operated remotely during the operational phase, it will not result in a need for site staff or wastewater management (i.e. welfare facilities) and operational traffic will be negligible.

Mitigation Measures

No mitigation measures are proposed as the construction phase would be carried out in accordance with the CEMP. Dust and Noise monitoring would be in accordance with best practice. However, the CEM, dust and noise monitoring are considered to be in accordance with best practice and not mitigation measures.

Likely impacts of the project (alone or in combination)

The site is not located within or adjacent to any European Site so there is no risk of habitat loss, fragmentation, or any other direct impact. Applying the source-pathway-receptor method, I am satisfied that there is no potential for a hydrological pathway between the appeal site and the River Barrow & Nore SAC or any other European designated site.

In combination effects

The proposed development will not result in any effects that could contribute to an additive effect with other developments in the area. No mitigation measures are required to come to these conclusions.

Appropriate Assessment: Stage 1 : Conclusion- Screening Determination

Having considered the nature, scale and location of the proposed development, I am satisfied that it can be eliminated from further assessment because there is no conceivable risk to any European site. The reason for this conclusion is as follows:

- The proposed development is on brownfield lands within an existing established Power Plant site, and therefore there would be no in combination effects with the Power Station.
- I note that there are no direct hydrological connections between the subject site and any European site.
- Having regard to the separation distance from the European sites regarding any other potential ecological pathways and intervening lands.
- The site is not used on an ex-situ basis for Qualifying Interests.
- No potential to spread invasive species.
- All surface water is to be contained on site.

I conclude that on the basis of objective information, that the proposed development would not have a likely significant effect on any European Site either individually or in combination with other plans or projects.

Likely significant effects are excluded and therefore Appropriate Assessment (stage 2) (under Section 177V of the Planning and Development Act 2000) is not required.