



An  
Coimisiún  
Pleanála

## Inspector's Report

**ABP-321356-24**

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Development	Proposed Development of a new downstream underground gas pipeline connection between existing Dublin to Galway high pressure gas pipeline and an existing peaking plant generation station at Edenderry Power Station
Location	at Ballykilleen, County Offaly
Planning Authority	Offaly County Council Meath County Council Westmeath County Council Kildare County Council
Prospective Applicant	Gas Networks Ireland
Type of Application	Pre-Application Consultation under Section 182E of the Planning and Development Act 2000, as amended
Date of Site Inspection	2 <sup>nd</sup> May 2025
Inspector	Tomás Bradley

## **1.0 Introduction**

Under the provisions of Section 182E of the Planning and Development Act 2000, as amended (PDA), Gas Networks Ireland (the prospective applicant) has made a pre-application request to An Coimisiún Pleanála (the Commission) for the development of a new downstream underground gas pipeline. A design flexibility opinion is sought separately under the provisions of Section 182G of the Act under ACP-323000-25.

The Commission is requested to determine whether the proposed development constitutes Strategic Infrastructure Development (SID). The prospective applicant is of the view that the proposed development constitutes SID.

## **2.0 Site Location and Description**

The pipeline, for which the prospective applicant presented three route options, will run between existing Dublin to Galway high pressure gas pipeline at either

- (Route 1 - Orange) west of Kinneagad, Co. Westmeath
- (Route 2 – Green) east of Kinnegad in Co. Meath
- (Route 3 – Purple) northwest of Longwood, Co Meath. townland of Kilwarden, Co. Meath.

and an existing peaking plant generation station at Edenderry Power Station in the townland of Ballykileen, County Offaly. Edenderry Power Station is within the lands owned by Bord na Mona, close to the existing peaking plant for which the gas supply is required. The power station is accessed via the R401 Regional Road. Routes are illustrated in Figure 2 of the submission of 27<sup>th</sup> November 2024 and may pass between a number of counties depending on the option including Offaly, Kildare, Meath and Westmeath.

The potential route options being considered cover a distance of approximately 23 km. The lands between the pipeline terminus and the existing Dublin-Galway Pipeline are primarily agricultural lands in pasture. The routes generally avoid settlements. There are single rural dwellings and agricultural complexes in proximity to the routes.

In its initial submission of 27<sup>th</sup> November 2024, I note the applicant considered Route 2 – Green its ‘emerging preferred route’ based on a multi-criteria analysis. In its letter

requesting closure of the pre-application file, it was indicated that Route 2 – Green remained its preferred option.

### 3.0 Proposed Development

The proposed development will connect the existing Edenderry Power Station to the existing Dublin to Galway Gas Pipeline. The plant is currently oil-fired, and the connection will facilitate a transition of the plant to natural gas. The proposed development generally comprises:

- Above Ground Installation (AGI) at Edenderry Power Station including the construction of a compound bound by security fencing, and associated development, along with associated access arrangements and ancillary works. The AGI compound will accommodate pipework, plant, and ancillary structures and will serve to deliver gas from the proposed pipeline to the existing peaking plant generation station.
- Below Ground Downstream Transmission Pipeline between Edenderry Power Station and the existing Dublin-Galway Pipeline.
  - There are currently three route options being considered and an emerging preferred route has been identified.

### 4.0 Planning History

There is no relevant planning history of note. The applicant has provided a planning history for the Edenderry Power Station, which is noted.

### 5.0 Precedent

The following precedent is noted:

<b>Ref</b>	<b>Description</b>	<b>Decision</b>	<b>Signed</b>
GC0002	Proposed gas pipeline to be laid from an existing above ground installation at Curraleigh West, Co. Tipperary to an existing compressor station at Midleton, Co. Cork.	Is a Strat. Infrast. Dev.	04/06/2008
GC0003	Proposed grid connection pipeline from the Shannon LNG terminal at Tarbert, County Kerry to the Bord Gáis Éireann Network at Foynes, County Limerick.	Is a Strat. Infrast. Dev.	22/07/2008
GC0004	Re-routing Of Onshore Upstream Gas Pipeline Relating To Corrib Gas Project, Co. Mayo	Is a Strat. Infrast. Dev.	06/02/2009
GC0006	Gas Pipeline To Great Island Power Station, Co. Wexford.	Is a Strat. Infrast. Dev.	18/10/2011

## 6.0 Legislative Context

### 6.1. Strategic Infrastructure Development

Section 2 of the PDA, defines strategic infrastructure development as including, inter alia:

*(e) any proposed strategic gas infrastructure development referred to in section 182C(1)*

Section 182C (1) of the PDA, defines 'strategic gas infrastructure development' as:

*any proposed development comprising or for the purposes of a strategic downstream gas pipeline or a strategic upstream gas pipeline, and associated terminals, buildings and installations, whether above or below ground, including any associated discharge pipe.*

Section 2 of the PDA provides a definition of 'strategic downstream gas pipeline':

*any proposed gas pipeline, other than an upstream gas pipeline, which is designed to operate at 16 bar or greater, and is longer than 20 kilometres in length"*

Section 182C (1) of the PDA, provides that applications for approval of a strategic gas infrastructure development shall be made directly to the Commission, it states:

*Where a person (hereafter referred to in this section as the "undertaker") intends to carry out a strategic gas infrastructure development (hereafter referred to in this section and section 182D as "proposed development"), and where the Board determines following consultations under section 182E that the development comes within paragraph (a), (b) or (c) of section 37A (2), the undertaker shall prepare, or cause to be prepared-*

*(a) an application for approval of the development under section 182D, and*

*(b) an environmental impact assessment report or Natura impact statement or both that report and that statement, as the case may be, in respect of the development,*

*and shall apply to the Board for such approval, accordingly, indicating in the application whether the application relates to a strategic upstream gas pipeline or a strategic downstream gas pipeline".*

As set out in Section 182C (1) of the PDA, to be considered as Strategic Gas Infrastructure, a development must also come within one or more of paragraphs (a) to (c) of section 37A (2) of the PDA. Section 37A (2) states:

*(a) the development would be of strategic economic or social importance to the State or the region in which it would be situate,*

(b) the development would contribute substantially to the fulfilment of any of the objectives in the National Planning Framework or in any regional spatial and economic strategy in force in respect of the area or areas in which it would be situated,

(c) the development would have a significant effect on the area of more than one planning authority".

## 7.0 Policy Context

The following policy and related objectives are noted:

- Department of the Environment, Climate and Communications (DECC) (2025) *Climate Action Plan 2025*
- Department of the Environment, Climate and Communications (DECC) (2024) *National Adaptation Framework Planning for a Climate Resilient Ireland*.
- DHLGH (2019) *Project Ireland 2040: National Planning Framework* (as revised in 2025)
  - NPO 61: In co-operation with relevant Departments in Northern Ireland, strengthen all-island energy infrastructure and interconnection capacity, including distribution and transmission networks to enhance security of electricity supply.
  - NPO 69: Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.
- Department of Communications, Energy and Natural Resources (DCENR) (2015) *White Paper on Energy – Irelands Transition to a Low Carbon future 2015-2030*
- The Eastern and Midlands Regional Assembly (EMRA) *Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Region (2020)*
  - RPO 10.20: Support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the Region and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this Strategy. This includes the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the

electricity and gas transmission grid in a sustainable and timely manner subject to appropriate environmental assessment and the planning process.

- County Development Plans
  - Offaly County Development Plan 2021-2027
    - CAEO-09: It is an objective of the Council to support the further extension of the gas grid into County Offaly to serve existing and envisaged future residential, commercial and industrial development.
  - Kildare County Development Plan 2023-2029
    - EC 04 Support infrastructural renewal and development of electricity and gas networks in the county, subject to safety and amenity requirements, subject to AA screening and where applicable, Stage 2 AA so as to ensure and protect the favourable status of European sites and their hydrological connections. Such developments will have regard for protected species and provide mitigation and monitoring where applicable.
    - EC P21 Support the infrastructural renewal and development of the gas networks in the county, subject to proper planning, heritage, environmental and amenity requirements.
    - EC 088 Support the maintenance of the existing gas network and the further upgrading and expansion of the gas grid across County Kildare to serve existing and future residential, commercial and industrial development.
  - Meath County Development Plan 2021-2027
    - INF POL 46 To support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the County and to facilitate new transmission infrastructure projects that may be brought forward during the lifetime of the plan including the delivery and integration, including linkages of renewable energy proposals to the electricity transmission grid in a sustainable and timely manner.
  - Westmeath County Development Plan 2021-2027

- CPO 10.170 Support and promote the improvement and extension of gas infrastructure to serve the County.
- CPO 10.173 Support and facilitate the development of enhanced electricity and gas supplies, which do not negatively impact on environmental quality, landscape, wildlife, habitats or residential amenity and which are critical to the economic development of the County.

These are all directly and indirectly supportive of gas related energy projects . It is noted a more detailed setting out of national and regional policy is contained in Section 6.0 of the applicant's submission should it be required by the Commission.

## **8.0 Submission of the Prospective Applicant**

The prospective applicant submitted its application on the 27<sup>th</sup> of November 2024 and including the following:

- Written Submission of John Spain dated 27<sup>th</sup> November 2024 with the following headings:
  - Introduction
    - Project Scope
    - Stakeholders and Roles
    - Legislative Background
    - Applicant/Agent Details
  - Site Location and Description
    - Pipeline Termination and AGI
    - Underground Gas Pipeline Routes
  - Planning History
  - Description of the Proposed Development
  - EIA and AA
  - Legal Interest of the Applicant
  - National and Regional Policy
  - Local Policy
  - Justification for SID
- Letter from GNI dated 26<sup>th</sup> November 2024
- EIAR Consultation Note prepared by AWN Consulting dated July 2024

- Drawing Pack prepared by Fingleton White.

In respect of the justification for SID, the applicant states the following

- The proposed development falls within the definition of a strategic downstream gas pipeline as:
  - The proposed development is a downstream gas pipeline, as it does not comprise an upstream gas pipeline (which are pipelines that are operated or constructed as part of a gas production project or which are used to convey unprocessed gas from such a project to a processing plant or terminal or final coastal landing terminal).
  - The proposed pipeline will operate at well in excess of 16 bar and is c. 23km in length.
- The proposed development represents a significant contribution to the objectives of the 2024 Climate Action Plan, 2023 Long Term Climate Action Strategy and 2024 National Adaptation Framework. The proposed development represents a major and strategic proposal to assist in the realisation of national energy and climate targets. On this basis it is submitted that the proposed development is by definition of strategic importance to both the region within which it is situated and the State as a whole, both economically and socially.

## **9.0 Meetings with the Prospective Applicant**

A meeting was held with the prospective applicant on the 30<sup>th</sup> of January 2025. The details of these meetings are set out in the record contained on the file.

## **10.0 Assessment**

GNI is the main undertaker for gas infrastructure development in Ireland and based on the description of the proposed development provided, it is clear that it would constitute strategic infrastructure development based on the definition in Section 182 (C) (1) of the PDA. It is a proposed development comprising or for the purposes of a strategic downstream gas pipeline, and associated terminals, buildings and installations, whether above or below ground

In respect of the definition of strategic downstream gas pipeline, it is considered that the proposed development will also meet this definition. All route options provided by

the applicant will be designed to operate at 16 bar or greater and is longer than 20 kilometres in length.

Having regard to the development description and design of the proposed development in terms of pressure (bar) and length (kilometres), it can be reasonably concluded that the prospective development may constitute SID.

The Commission should note that the pre-application submission was made on the basis of three potential underground gas transmission line connection route options. I am satisfied that either of the three route options (or any further variation of same) will still constitute 'gas transmission' development as defined under section 182C of the 2000 Act. It is noted that Route 2 – Green is the applicant's preferred option.

### **10.1. Conditions for SID**

Section 182C (1) of the PDA defers to Section 37A (2) and seeks clarification that the proposed development falls within one or more of the conditions set out above in Section 6.1

The development would be of strategic economic and social importance to the state in the context of the Climate Action Plan 2025. It would ensure a secure and reliable supply of gas to a significant generation centre in the context of Ireland's electricity supply. The proposed development would also contribute to climate targets and the reduction of emissions due to the transition from the existing flexible oil-fired peaking plant to a gas-fired operation.

A similar argument arises in how the proposed development will contribute substantially to the fulfilment of the objectives NPO 61, NPO 69, RPO 10.20 in the National Planning Framework or in Regional Spatial And Economic Strategy. There is a direct strengthening of the energy infrastructure nationally and regionally in the form of a strategic downstream gas pipeline.

Having regard to national and interregional role the Edenderry Power Station plays in Ireland energy network and coupled with the requirements of the Climate Action Plan 2025 it is considered that the proposal would be of strategic importance to the nation and region.

The development would, therefore, satisfy the requirement set out in section 37A (2) (a) of the PDA. The proposed development would contribute to the objectives of the NPF and the provisions of the RSES.

The proposed development given its linear nature will run through up to three planning authorities. However, on this basis of the information contained in the EIAR Consultation Report provided by the applicant, it is not considered the development will have a significant effect on the area of more than one planning authority. The development would not come within the scope Section 37A (2) (c) also.

## **10.2. Prescribed Bodies**

In view of the nature and location of the proposed development, as described in this report, it is recommended that the prospective applicant should consult with the prescribed bodies listed in the attached Appendix in respect of any future application for approval.

## **11.0 Recommendation**

Based on the foregoing assessment, it can be concluded that the proposed development would meet the definition of 'strategic gas infrastructure development' set out in Section 182 (C) (1) of the PDA and 'strategic downstream gas pipeline' set out in Section 2 of the PDA. It can also be concluded that the development is of strategic importance by reference to the requirements of Section 37A (2) (a) and Section 37A (2) (b) of the PDA.

It is recommended that the Commission serve a notice on the prospective applicant, pursuant to Section 182 (C) of the PDA stating that it is of the opinion that the proposed development constitutes a strategic infrastructure development within the meaning of Section 182 (C) of the PDA.

## **12.0 Reason and Consideration**

Having regard to the size, scale and length of the proposed downstream gas pipeline and associated development, and to the policy context, it is considered that the proposed development constitutes development that falls within the definition of 'strategic gas infrastructure development' set out in Section 182 (C) (1) of the Planning and Development Act 2000, as amended and 'strategic downstream gas

pipeline' set out in Section 2 of the Planning and Development Act 2000, as amended.

The proposed development is also considered to be of strategic importance by reference to the requirements of Sections 37A (2) (a) and (b) of the Planning and Development Act 2000, as amended. An application for permission for the proposed development must therefore be made directly to An Coimisiún Pleanála under section 182 (C) of the Planning and Development Act 2000, as amended.

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Professional Declaration

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.

A handwritten signature in black ink, appearing to read 'Tomás Bradley', is written over a horizontal line.

Tomás Bradley,

Senior Planning Inspector

26<sup>th</sup> of January 2026

## Appendix A

Note 1: The following is a list of prescribed bodies considered relevant for the purposes of section 182C (4) (b) of the Planning and Development Act 2000, as amended.

- Minister for Housing, Local Government and Heritage (Development Applications Unit)
- Minister for the Environment, Climate and Communications
- Minister for Transport
- the planning authority or authorities in the area or areas in which it is proposed to situate the proposed development (which may include inter alia Offaly County Council, Kildare County Council, Meath County Council or Westmeath County Council depending on the final alignment of the route)
- Eastern & Midland Regional Assembly
- Transport Infrastructure Ireland
- An Chomhairle Ealaíon
- An Taisce – the National Trust for Ireland
- Fáilte Ireland
- Inland Fisheries Ireland
- Waterways Ireland
- Córas Iompair Éireann
- Railway Procurement Agency
- Railway Safety Commission
- Environmental Protection Agency
- The Heritage Council
- Health Service Executive
- Commission for Energy Regulation
- Uisce Éireann

Further notifications should also be made, where deemed appropriate.