An Bord Pleanála



Prospective Applicant:	Ecopower Developments	
Planning Authority:	Tipperary County Council	
Issue:	SID Pre-application – whether project is or is not strategic infrastructure development	
Nature of Development:	Proposed 110kV Electrical Substation at Mountphillips, Newport, County Tipperary	
Inspector:	Juliet Ryan	
Date of Site Inspection:	5 July 2016	

1.0 INTRODUCTION

- 1.1 The subject pre-application consultation relates to a proposed 110kV electricity substation at Mountphillips, Newport, County Tipperary and associated underground line route. The development constitutes the grid connection for the Upperchurch windfarm (the latter having been granted by ABP under PL22.243040).
- 1.2 The new substation is intended to connect with the permitted 110kV Upperchurch windfarm substation via c.30km of underground 110kV line, and its purpose is to link the windfarm to the national grid (connecting with the Nenagh Killonan 110kV overhead lines). The project will be described further below.
- 1.3 A pre-application consultation meeting with the prospective applicants was held on 20th May 2016 (see below for details). The primary purpose of this meeting was to address the issue of whether or not the proposed development constitutes strategic infrastructure.

2.0 SITE LOCATION

- 2.1 The subject site comprises an area of c.30km running west from the location of the permitted Upperchurch windfarm to the existing Nenagh Killonan 110kV overhead line at Mountphillips, County Tipperary. The permitted windfarm (not yet constructed) will be located some 2 kilometres west of the village of Upperchurch and c. 17 km west of Thurles. The grid connection at Mountphillips is located some 15 km northeast of Limerick and c.20 km southwest of Nenagh. The intervening proposed c.30 km of underground cable will run between these two points, largely through agricultural and forested lands. The route roughly parallels the R503 regional road, at an approximate average separation distance of c. 2km to the north of the road. The area is an undulating upland area to the south of the Silvermines Mountains.
- 2.2 As the route travels west from Upperchurch, it traverses the Bilboa River (at Kilcommon), the Clare River, and the Mulkear River. The prospective applicants submit that some 17.5 km of the route goes through agricultural lands; some 10.9 km through forestry / forest roads, and some 1 km along public roads. Key settlements along the route include Upperchurch, Kilcommon, Rear Cross, Toor and Newport.
- 2.3 The proposed substation site at Mountphillips is located in an existing field in a rural area and accessed from an existing farm entrance at the western side of the local county road, some 2km north of the village of Newport, at a straight section of carriageway.

- 2.4 The proposed substation site is at a setback some 800 metres from the road, with the intervening area currently in pasture. Despite a noticeable amount of ribbon rural housing development, the local road in this location has a strong rural character, which is largely attributable to its narrow width, and relatively undisturbed hedgerows. The closest house to the substation is located some c.450 metres to the south.
- 2.5 The existing 110kv line runs in a north-south direction through the site, with 1 no. existing lattice tower located in the field closest to the road.

3 THE PROPOSED DEVELOPMENT

- 3.1 The particulars of the proposal are as follows:
 - 1 no. new 220kV / 110kV Gas Insulated Switchgear (GIS) substation on a 0.2 ha site
 - Site access road of 800m length
 - Removal of a section (c.150 m) of existing Nenagh Killonan
 110kv overhead line (including 1 no. lattice tower)
 - 2 no. new 23m high end mast lattice towers and associated cables to provide connection with the existing Nenagh – Killonan 110kv Line
 - Some 30km (approximately) of underground 110kV line running west from the townland of Knockcurraghola Commons to Mountphillips
 - All associated works
- 3.2 The substation will comprise a single building of 25m x 20m and c.7.3 metre height, with associated landscaping and security measures, including a 2.65 metre high compound fence.
- 3.3 The proposed substation will be accessed from the proposed new access road running west from the existing farm entrance at the public road.
- 3.4 The proposed cabling is designed to ESB specifications, with the underground route using standard trefoil ducting in trenches of 1.2 metre depth, which will ultimately become a permanent ESB wayleave. The prospective applicants confirm that all landowner consents (36 no.) are in place.

3.5 The prospective applicants have confirmed that in-stream works will be necessary, with directional drilling in 2 no. rivers and horizontal drilling in one. Some 38 no. further smaller watercourses will be traversed. Consultation has been undertaken with NPWS and Fisheries in this regard.

4.0 PROSPECTIVE APPLICANT'S POSITION

The key elements of the Applicant's submission may be summarised as follows:

- Proposal required to transport electricity to national grid from permitted windfarm at Upperchurch and is necessary to ensure viability of windfarm
- Permission for windfarm granted August 2014 (was subject to judicial review but ABP's decision was upheld) and will be next large project for Ecopower.
- Construction is planned to be underway in Q2 2017, with the project intended to be operational in 2018.
- One of the influencing factors for the choice of access to the proposed substation was the existing farm entrance with good sightlines in both directions
- An NIS is being prepared
- The prospective applicants seek the Board to confirm whether an Environmental Impact Statement is required to accompany the application
- The prospective applicants note that the proposal is not of a type set out in Schedule 5 of PDR, 2001, as amended, but that an environmental assessment is being carried out nonetheless
- The North Tipperary County Development Plan 2010 (as varied) is supportive of facilitating connectivity of sustainable renewable energy resources to the electricity network (S.8.7)
- Various consultations have taken place including with the Planning Authority (including Heritage Officer), NPWS, Regional Fisheries Officer, Coillte, IFI, and the Development Applications Unit.
- All landowner consents are in place

- Prospective Applicants consider proposal IS SID in accordance with S.182A (9) insofar as it is proposed to transport electricity at a voltage of 110kV
- Applicants provide written confirmation from CER that the Killonan-Nenagh 110kV line is part of the distribution network
- The substation site is not prone to flooding, nor is it highly visible in the local area, given its setback from the road and low-lying location

5.0 CONSULTATIONS – SUMMARY OF KEY ISSUES AND ADVICE

The key issues arising during consultations with ABP may be summarised as follows (the signed Records should be consulted for further details):

- ABP representatives advised that various alternatives considered and the rationale for the chosen route option be clearly set out in any prospective application
- ABP representatives advised that public consultation would be encouraged in advance of any prospective application
- Ongoing consultation with the Planning Authority should be continued
- Condition no. 6 of the extant permission for the Upperchurch Windfarm requires agreement of construction phasing with NPWS. Any prospective application should demonstrate how it will tie in with same.
- If an EIS were to be submitted, clear identification of the study area would be required
- ABP representatives noted that issues pertaining to, inter alia, archaeology and ecology should be addressed in a comprehensive manner in any prospective application

6.0 LEGISLATIVE PROVISIONS

6.1 Under subsection 1 of Section 182A of the Planning and Development Act 2000 [inserted by section 4 of the Planning and Development (Strategic Infrastructure) Act 2006] where an undertaker:

"Intends to carry out development comprising or for the purposes of electricity transmission (hereafter referred to in this section and section 182B as 'proposed development'), the undertaker shall prepare, or cause to be prepared, an application for approval of the development under section 182B and shall apply to the Board for such approval accordingly."

6.2 Subsection 9 of Section 182A states that:

"In this section 'transmission' in relation to electricity, shall be construed in accordance with section 2(1) of the Electricity Regulation Act 1999 but, for the purposes of this section, the foregoing expression, in relation to electricity, shall also be construed as meaning the transport of electricity by means of:

- (a) a high voltage line where the voltage would be 110 kilovolts or more, or
- (b) an interconnector, whether ownership of the interconnector will be vested in the undertaker or not."
- 6.3 In section 2(1) of the Electricity Regulation Act 1999, "transmission" is defined in relation to electricity as meaning

"the transport of electricity by means of a transmission system, that is to say a system which consists, wholly or mainly, of high voltage lines and electric plant and which is used for conveying electricity from a generating station to a substation, from one generating station to another, from one substation to another or to or from any interconnector or to final customers, but shall not include any such lines which the Board may, from time to time, with the approval of the Commission, specify as being part of the distribution system, but shall include any interconnector owned by the Board."

"Electric Plant" is defined as:

"any plant, apparatus or appliance used for, or for the purposes connected with, the generation, transmission, distribution or supply of electricity other than —

- (a) an electric line,
- (b)a meter used for ascertaining the quantity of electricity supplied to any premises, or
- (c) an electrical appliance under the control of a consumer."

6.4 Section 3 of the Planning and Development Act sets out the definition of "development", whilst Section 4 sets out provisions in respect of exempted development. In this regard, Section 4(3) states:

"Notwithstanding paragraphs (a), (i), (ia) and (l) of subsection (1) and any regulations under subsection (2), development shall not be exempted development if an environmental impact assessment or an appropriate assessment of the development is required.

- (4A) Notwithstanding subsection (4), the Minister may make regulations prescribing development or any class of development that is—
- (a) authorised, or required to be authorised by or under any statute (other than this Act) whether by means of a licence, consent, approval or otherwise, and
- (b) as respects which an environmental impact assessment or an appropriate assessment is required,

to be exempted development."

6.5 Schedule 2 Part 1 Class 26 of the Planning and Development Regulations provides that the following is exempted development:

"The carrying out by any electricity undertaking of development consisting of the laying underground of mains, pipes, cables or other apparatus for the purposes of the undertaking."

7.0 ASSESSMENT

Arising from the nature and extent of the proposal, combined with the legislative context, I consider it first imperative to establish the status of the prospective works vis a vis development and exempted development provisions. Having done this, it will be necessary to consider whether EIA and/or AA are necessary (which may in turn have implications for exempted development status). Following this, a recommendation as to whether the proposal constitutes SID can be made.

7.1 Status of Prospective Works

- 7.1.1 The subject proposal comprises two main elements as follows:
 - c. 30km of underground 110kV electricity cable

New 110 kV substation and associated works

The 110kV substation and associated works is development for which there is no exemption.

7.1.2 The c.30km of underground electricity cable would come under Class 26 exemption were it carried out by any electricity undertaking. However, the prospective applicant is not an electricity undertaking, and therefore Class 26 exemption does not apply.

7.2 Appropriate Assessment

- 7.2.1 The proposed substation is not located within a designated site, but the proposed underground cable route runs through the following:
 - Slievefelim to Silvermines Mountains SPA 004165
 - Lower River Shannon SAC 002165

Given the above, an NIS is required due to its location within two European sites.

7.3 Environmental Impact Assessment

- 7.3.1 Given the nature and scale of the project, the pertinent references from Schedule 5 of PDR, 2001, as amended (which transposes Directive 2014/52/EU) are as follows:
 - Part 1 Class 20
 - Part 1 Class 22
 - Part 2 Class 3(b)
 - Part 2 Class 13(a)
 - Part 2 Class 13(c)
 - Part 2 Class 14
 - Part 2 Class 15

These will be examined below. A summary table is provided further below.

Part 1, Class 20:

Construction of overhead electrical power lines with a voltage of 220 kilovolts or more and a length of more than 15 kilometres

Comment:

The subject proposal does not entail the construction of any overhead power line. It proposes the construction of underground 110kV lines, and a loop-in connection from an existing 110kV line into a proposed substation.

The proposal would not require EIA under Part 1 Class 20.

Part 1, Class 22:

Any change to or extension of projects listed in this Annex where such a change or extension in itself meets the thresholds, if any, set out in this Annex.

Comment:

The subject proposal involves the removal of a certain section of overhead 110kV cable to facilitate the loop-in to the proposed substation. 110kV cable is not a qualifying class.

The proposal would not require EIA under Part 1 Class 22.

Part 2, Class 3(b):

Industrial installations....or transmission of electrical energy by overhead cables not included in Part 1 of this Schedule, where the voltage would be 220 kilovolts or more.

Comment:

The subject proposal does not propose the transmission of electrical energy by overhead cables. It proposes the construction of underground 110kV lines. The proposal would not require EIA under Part 2 Class 3(b).

Part 2, Class 13(a):

- (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.

Comment:

The proposal does not entail any change or extension of a class or scale that would result in the need for EIA under Part 2 Class 13(a).

Part 2, Class 13(c):

Any change or extension of development being of a class listed in Part 1 or paragraphs 1 to 12 of Part 2 of this Schedule, which would result in the demolition of structures, the demolition of which had not previously been authorised, and where such demolition would be likely to have significant effects on the environment, having regard to the criteria set out under Schedule 7.

Comment:

The subject proposal involves the removal of a c.150m section of 110kV overhead cable and 1 no. existing lattice tower, both part of the existing Nenagh-Killonan 110kV line. Given that the existing 110 kV overhead line is not of a class requiring EIA (i.e. not 220kV) any change to it would not therefore come under Part 2 Class13(c).

Part 2, Class 14:

Works of demolition carried out in order to facilitate a project listed in Part 1 or Part 2 of this Schedule where such works would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.

Comment:

The product of the demolition in this instance (i.e. the loop-in to a new 110kV substation) is not of a type requiring EIA under Part 1 or 2. As such, the demolition does not facilitate a project requiring EIA.

The proposal would not require EIA under Part 2 Class 14.

Part 2, Class 15:

Any project listed in this Part which does not exceed a quantity, area or other limit specified in this Part in respect of the relevant class of development but which would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.

Comment:

As in the case of Part 2, Class 14 above, the subject proposal is not of type requiring EIA under Part 1 or 2, regardless of threshold.

The proposal would not require EIA under Part 2 Class 15.

SUMMARY

TYPE / CLASS	SUMMARY	COMMENT	EIA REQUIRED?
Part 1 Class 20	Construction of overhead electrical power lines of 220 kV or more and length of more than 15 kilometres	No construction of overhead power lines proposed. Everything 110kV.	NO
Part 1 Class 22	Any change/ extension of projects listed in this Annex where such a change/ extension in itself meets the thresholds	No part of the project in itself meets the thresholds	NO
Part 2 Class 3(b)	Transmission of electrical energy by overhead cables not included in Part 1 of this Schedule, where the voltage would be 220 kilovolts or more.	No transmission by overhead cables is proposed All voltage is 110kV.	NO
Part 2 Class 13(a)	Any change/extension of development already authorized / executed (not being a change or extension referred to in Part 1) which would:- (i) result in the development qualifying	Not of a class or scale that would qualify	NO
	(ii) result in an increase in size greater than –		
	- 25 per cent, or - an amount equal to 50 % of appropriate threshold.		
Part 2 Class 13(c)	Any change/extension of development being of a class listed in Part 1 or paragraphs 1 to 12 of Part 2 of this Schedule, which would result in the demolition of structures, the demolition of which had not previously been authorised, and where such demolition would be likely to have significant effects on the environment, having regard to the criteria set out under Schedule 7.	Existing 110kV Nenagh- Killonan line is not qualifying class	NO
Part 2 Class 14	Demolition to facilitate a project listed in Part 1 or Part 2 of this Schedule where such works would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.	The project is not of a class listed in Part 1 or 2.	NO
Part 2 Class 15	Any project listed in this Part which does not exceed a quantity, area or other limit specified in this Part in respect of the relevant class of development but which would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.	The project is not of a class listed in Part 2.	NO

- Arising from the above, the subject proposal does not require EIA having regard to Schedule 5 of PDR, 2001 as amended, nor do any issues of sub-threshold EIA arise.
- 7.3.2 Notwithstanding that I do not consider EIA necessary in the instant case, I would note that the prospective applicant is undertaking environmental assessment, including habitat surveys in an area of 50 metres at either side along the cable route. Further, I note that hen harriers and archaeology are among potential environmental issues.

7.4 Whether Proposal is SID

- 7.4.1 It would appear that the proposed electricity line aspect of the development would fit the description of 'transmission' as set out in Subsection 9 of 182A insofar as it comprises a 'high voltage line where the voltage would be 110 kilovolts or more'.
- 7.4.2 However, the Prospective Applicants have provided written confirmation from CER that the circuit into which the development will link (namely, the existing 110kV Killonan-Nenagh line) is part of the distribution network as a tail-fed 110kV line. Whilst section 2(1) The Electricity Regulation Act 1999, provides that CER can specify from time to time certain lines that are part of the distribution system, and that said lines would therefore not be considered "transmission", this provision does not override subsection 9 of Section 182A, which incorporates the definition from the Electricity Regulation Act as well as its own provisions as follows:
 - "In this section 'transmission' in relation to electricity, shall be construed in accordance with section 2(1) of the Electricity Regulation Act 1999 but, for the purposes of this section, the foregoing expression, in relation to electricity, shall also be construed as meaning the transport of electricity by means of:
 - (a) a high voltage line where the voltage would be 110 kilovolts or more, or
 - (b) an interconnector, whether ownership of the interconnector will be vested in the undertaker or not."

It can be seen from the above that the definitions in the Electricity Regulation Act are incorporated and subservient to S.182A(9) for the purposes of strategic infrastructure electricity undertakings.

7.4.3 Having regard to the above, and notwithstanding that the proposed connection would not be considered "transmission" per the Electricity Regulation Act, it would fall under the definition of "transmission" per S.182A(9).

7.4.4 With respect to the substation, however, the legislation is less clear. Section 182A(9) of PDA sets a threshold of 110 kilovolts in order for a high voltage electricity transmission line to be considered strategic infrastructure. No threshold is set in respect of a substation. In this regard I would consider the substation in the subject proposal to constitute "electric plant" in accordance with the Electricity Regulation Act:

"any plant, apparatus or appliance used for, or for the purposes connected with, the generation, transmission, distribution or supply of electricity other than —

- (a) an electric line,
- (b)a meter used for ascertaining the quantity of electricity supplied to any premises, or
- (c) an electrical appliance under the control of a consumer."

It follows, then, that if the new 30km line connected with the plant is deemed to be SID per S.182A(9) due to its 110kV voltage, that the substation itself would also constitute SID, being an integral element of the connection project (i.e. proposed development).

- 7.4.5 A 110kV substation in and of itself may not necessarily constitute a SID (and the Board has determined previously that similar such substation proposals are not SID VC0040; VC0045; VC0061; VC0069; VC0074), but given that the substation in the instant case is part of an overall grid connection that would constitute SID by virtue of the 110kV line, then I am satisfied that this also incorporates the substation.
- 7.4.6 Having regard to the above, I am satisfied that the proposal constitutes SID in accordance with Section 182 A. The Board is advised that the prospective applicants are of the same mind.

7.5 Precedent Cases

7.5.1 There are a large number of decided electricity pre-application consultation cases that have some comparable elements to the subject proposal. With specific respect to substations and associated works, where new substations have been proposed, those of 220kV and higher have generally been deemed by the Board to constitute SID (e.g. VC0058); and, as noted above, 110kV substations have generally been deemed not to constitute SID.

- 7.5.2 In cases where the Board considers the proposal will form part of the transmission network it has deemed the proposal to constitute SID in accordance with S.182A (e.g. VC0046; VC0058; VC0062).
- 7.5.3 Case VC0016 related to the construction of two new 110kV towers adjacent to the existing Arklow-Carrickmines 220kV line. The Board deemed this proposal was not SID. Notably, in that history case the 2 no. new 110kV towers were proposed to drop down from the existing 220kV line to facilitate the underground cabling of the 110kV line so that it would ultimately link to the Charlesland 110kV station. Significantly, however, there were no issues pertaining to EIA or AA in Case VC0016; as such, the underground cabling was exempt per Schedule 2 Part 1 Class 26 of PDR, 2001 as amended, and the net issue to be determined for SID purposes was the 2 no. new 110kV towers that would facilitate a dropping down to the distribution system. As such, I consider the subject case to differ in nature and extent from VC0016, particularly having regard to the implications arising from the need for AA.
- 7.5.4 In a recent pre-application case pertaining to a proposed 'loop-in' connection to an existing 220kV power line at Clonee, County Meath (VC0087), the Board decided that the project was SID in accordance with S.182A. Notably, in that case, the prospective applicants sought to isolate the proposed loop-in connection from a proposed 220kV substation. The Board did not agree with this approach, and considered that the loop-in connection and associated substation could not be separated. This reasoning is instructive in the instant case.
- 7.5.5 The proposed development at Clonee referenced above (VC0087) was considered to be significantly under the threshold for EIA per Part 1(20) and Part 1 S.3(b) Schedule 5 by the reporting Inspector. However, the Board determined that an EIS should be submitted with that proposal (no explicit reason given). Notably, the subject proposal differs from VC0087 insofar as that case involved development of a type (overhead cables of 220kV) that is included in Schedule 5.

7.6 Summary & Options

There are two main components of the subject proposal – a 110kv substation and a 30km underground cable route. The former is development requiring planning permission, but in and of itself would not constitute SID per S.182A. The 30km underground cable route would generally be considered to be exempted development per Class 26, but is de-exempted in the instant case due it traversing an SPA and an SAC and therefore requiring AA. Accordingly, the trigger for the qualification under SID is the need for AA for the 30km underground

cabling, which, being 110kV, consequently qualifies as SID per S.182A(9).

Having regard to the above, I would consider the following options may be considered by the Board:

7.6.1 Option 1

The Board may seek to assess the substation in isolation (i.e. separate from underground cable route) and therefore deem it not to come within S.182A and not constitute SID. This would leave the underground cable a separate SID proposal that would also be subject to AA. I can see no merit in this approach which would risk various delays at later stages and charges of project splitting. I would also note that the prospective applicants view the proposal as a single project.

7.6.2 Option 2

Accept that the proposal constitutes Strategic Infrastructure per the definition of S.182A(9) given that 30km of 110kV underground cable requiring AA is proposed, and that because of this, the project as a whole is SID. The application should be accompanied by a NIS due to the presence of European Sites along the cable route. The application does not require EIA given that it is not of a type set out in Schedule 5.

7.6.3 Option 3

As in Option 2 above, accept that the proposal constitutes Strategic Infrastructure per the definition of S.182A(9) given that 30km of 110kV underground cable requiring AA is proposed, and that because of this, the project as a whole is SID. The application should be accompanied by a NIS due to the presence of European Sites along the cable route. Notwithstanding that the application is not of a type set out in Schedule 5, the Board may consider that an EIS is required given the nature, extent, and location of the proposal. In forming this position the Board may place weight on the fact that it will facilitate the grid connection for a windfarm of 22 no. turbines (whereby EIA was required). The Board may also rely on the fact that an EIS was required to be submitted with VC0087, notwithstanding that the latter was significantly below threshold. A risk with this approach would be that it would set a

precedent for EIA in projects that are not of a type set out in Schedule 5. In this regard it is noted that the subject proposal differs from VC0087, which, whilst sub-threshold, was of a class included in Schedule 5 (Part 1(20) and Part 2(3(b)).

8 CONCLUSION / RECOMMENDATION

8.1 Conclusion

I confirm that I have carried out an inspection of the substation site, surrounding area, and the proposed underground cable route. Having regard to the nature and scale of the proposed development, which traverses and SAC and an SPA, and to Section 4(3) of the Planning and Development Act 2000; as amended, and having regard to S.182 A and, particularly to the definition of 'transmission' in Subsection 9, I conclude that the proposed development falls within the meaning of Section 182A of the Planning and Development Act 2000. In this regard I consider Option 2 as outlined above to be the most appropriate approach to the instant case.

I consider that any prospective application should be accompanied by a Natura Impact Statement. I do not consider that EIA is required.

8.2 Recommendation

I recommend that the Board serve a notice on the prospective applicant, pursuant to Section 182A of the Planning and Development Act 2000, as amended, stating that it is of the opinion that the proposed development constitutes a strategic infrastructure development for the reasons set out below.

The Board also considers it appropriate that the SID application be accompanied by a Natura Impact Statement.

Reasons and Considerations

Having regard to the nature of the development and to the relevant legislative provisions, I recommend that the proposed 110kV substation and c.30 km of 110kV underground electrical line and all associated works falls within the scope of 182A of the Planning and Development Act, 2000 as amended. Accordingly, the proposed development would be strategic infrastructure within the meaning of the Act and any application for approval must therefore be made directly to An Bord Pleanála.

Juliet Ryan Senior Planning Inspector

12 July 2016

I recommend that the following list of Prescribed Bodies are consulted in relation to the proposed development in accordance with Section 182(4)(b) of the Act:

- The Minister for the Arts, Heritage and the Gaeltacht (NPWS)
- The Minister for Communications, Energy and Natural Resources
- Tipperary County Council
- TII
- An Taisce
- The Heritage Council
- Inland Fisheries Ireland
- The Commission for Energy Regulation
- Health Service Executive
- EPA
- IDA
- Irish Water
- Waterways Ireland
- Coillte
- OPW

Juliet Ryan Senior Planning Inspector