

The Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1.

Date: 29 May, 2025
Our Ref: LW/ MF JN 22058

Dear Sir/ Madam,

RE: RESPONSE TO AN BORD PLEANÁLA UNDER SECTION 132 OF THE PLANNING AND DEVELOPMENT ACT IN RESPECT TO THE PROPOSED DEVELOPMENT COMPRISING THE CONSTRUCTION OF THREE NEW DATA CENTRE BUILDINGS (BUILDING E, F, AND G) AND ASSOCIATED WORKS ON LANDS AT CRUISERATH ROAD, DUBLIN 15.

FINGAL COUNTY COUNCIL REG. REF.: FW22A/0308

AN BORD PLEANÁLA REF.: PL06F.318180

INTRODUCTION

On behalf of the applicant, Universal Developers LLC, which has its registered office at 251 Little Falls Drive, Wilmington, New Castle County, Delaware, 19808, USA, we, John Spain Associates, 39 Fitzwilliam Place, Dublin 2, hereby submit a response to a request under section 132 of the Planning and Development Act 2000, as amended, to make further submissions in relation to the above-referenced appeal.

This response is submitted to the Board in advance of the deadline provided in the Board's correspondence (5:30pm on the **29th of May 2025**).

The Board's section 132 request (dated the **2nd of May 2025**, and received on the 6th of May 2025) relates to two items on which submissions were requested.

Managing Director: John P. Spain
Executive Directors: Paul Turley | Rory Kunz | Stephen Blair | Blaine Cregan | Luke Wymer
Senior Associate Directors: Meadhbh Nolan | Kate Kerrigan | Brian Coughlan | Ian Livingstone
Associate Director: Tiarna Devlin

The first item of information requested by the Board is as follows:

“1. In order to demonstrate that the Transmission System Operator is satisfied that there is sufficient capacity in the national grid to service the development, you are required to provide a copy of the agreement with the Transmission System Operator that clearly demonstrates that you have a fixed connection agreement with the Transmission System Operator to connect the specific data centre buildings the subject of this appeal (i.e., Buildings E, F and G) to the grid.”

The second item of information requested by the Board is as follows:

“2. In relation to the environmental impact assessment of the Proposed Development and Overall Project and the necessity, as set out in the Environmental Protection Agency 2022 "Guidelines on the information to be contained in Environmental Impact Assessment Reports (EIAR)", to identify a reasonably foreseeable worst-case scenario as a context for 'likely significant effects', the Board noted:

(a) the Climate Action Plan 2025 published on the 15th April 2025 and Section 11.1 Electricity State of Play that "There has been a steady decline in annual emissions from 9.89 MtCO₂eq. in 2021 to 7.56 MtCO₂eq. in 2023. While the EPA Projections Report 2023-2050 indicates an overshoot of over 1 MtCO₂eq. in the period 2021 to 2025, and an overshoot of over 5 MtCO₂eq. in the second period 2026 to 2030, these are both significant improvements on the projected overshoots (5.2 MtCO₂eq. and 8.2 MtCO₂eq. respectively) set out in the Climate Action Plan 2024".

(b) the aforementioned Environmental Protection Agency Report "Ireland's Greenhouse Gas Emissions Projections 2023-2050" published in May 2024. In particular in the associated document "Input Assumptions for Ireland's Greenhouse Gas Emissions Projections", Table 1: Policy Input Assumptions contained modelling assumption details outlined in the With Existing Measures and With Additional Measures scenarios.

In light of the publication of the Climate Action Plan 2025 by Government and Ireland's Greenhouse Gas Emissions Projections 2023-2050 by the Environmental Protection Agency since the preparation of the Environmental Impact Assessment Report and its addendum, to assist the Board in carrying out its Environmental Impact Assessment you are required to:

(i) re-affirm, or otherwise, the findings of its environmental assessment in relation to climate based on its modelling assumptions, and

(ii) provide details of, and observations regarding, the significant differences that may arise in the emerging context noting the points raised in 2(a) and (b) above.”

A copy of the Board's correspondence is enclosed as **Appendix 1** to this document for ease of reference.

In order to fully and robustly respond to the section 132 request, and to assist the Board's consideration and determination of the current appeals, the following documents are included as appendices to this document:

- **Appendix 2** comprises a letter prepared by Matheson LLP Solicitors, along with a copy of the executed connection agreement (with certain commercially sensitive information redacted as explained below) for the proposed development, which clearly demonstrates the existence of a fixed connection agreement with the

Transmission System Operator to connect the specific data centre buildings the subject of this appeal (i.e., Buildings E, F and G) to the grid.

- **Appendix 3** comprises a letter from the Transmission System Operator, EirGrid, confirming that the connection agreement provides for the entire power requirement of the proposed data centre buildings subject of the current appeal.
- **Appendix 4** prepared by AWN Consulting comprises an environmental technical note responding to the second point (2(i) and 2(ii)) of the Board's section 132 request.
- **Appendix 5** prepared by AWN Consulting comprises an updated version of the EIAR Addendum Report on Climate, taking into account recent policy and evidence including CAP 25 and the EPA's report "*Ireland's Greenhouse Gas Emissions Projections 2023-2050*". The updated EIAR Addendum Report also takes account of the most recently published "*Ireland's Greenhouse Gas Emissions Projections 2024-2055*", which was published in May 2025, after the Board issued the current request under section 132 of the Act. This appendix is an update of the EIAR Addendum submitted to the Planning Authority with the Further Information response on the 2nd of August 2023.
- **Appendix 6** prepared by AWN Consulting comprises an updated environmental technical note which sets out the manner in which the Environmental Impact Assessment Report for the Proposed Development and of the Overall Project (i.e. the Proposed Development and existing / permitted / potential future development on the wider landholding) and the response to third party appeals have taken into account the uncertainty in line with the relevant guidance (this is an update of an assessment of uncertainty document submitted to the Board with the previous section 131 response on the 21st of June 2024).
- **Appendix 7** prepared by AWN Consulting and John Spain Associates comprises an updated statement on the consistency of the Proposed Development with section 15(1) of the Climate Action and Low Carbon Development Act 2015, as amended, having regard to the adoption of the 2025 Climate Action Plan (this is an update of the section 15 compliance document submitted to the Board with the previous section 131 response on the 21st of June 2024).
- **Appendix 8** comprises a letter of intent from Amazon Web Services in respect of the Blanchardstown District Heating Scheme (this letter of intent is referred to within Appendix 7, in the context of district heating objectives under CAP 25).

Section 9.2.1 of Appendix 5 (updated EIAR Addendum Report) provides a list of the relevant climate policy and guidance which have been considered to prepare this response to the Board's request under section 132 of the Act.

The next section of this cover letter provides an update in respect of the recently published first revision to the National; Planning Framework.

FIRST REVISION TO THE NATIONAL PLANNING FRAMEWORK

In addition to the updated Climate Action Plan (2025), and the EPA's report "*Ireland's Greenhouse Gas Emissions Projections 2023-2050*" referred to in the Board's section 132 request, it is noted that, since the submission of the application for the Proposed Development and the subsequent appeal responses, the first revision of the National Planning Framework (Ireland 2040) has been approved.

The revised National Planning Framework (NPF) states the following in relation to data centre development:

"In addition, Ireland is very attractive in terms of international digital connectivity, climatic factors and current and future renewable energy sources for the development of

international digital infrastructures, such as data centres. These factors help to underpin Ireland's international position as a leading location for ICT, which contributes to wider synergies in the economy as indigenous and multinational enterprises develop linkages and benefit from the potential of regional clustering.

Developing the potential offered by connectivity and the digitalisation of rural areas for the benefit of inhabitants and businesses, is important to ensure that a digital divide does not emerge between urban and rural areas, and between different regions. This can include e-literacy skills, access to e-health and other public services, innovative solutions, circular economy application to agricultural waste, promotion of local products supported by technology and ICT, implementing and taking full benefit of smart specialisation agri-food projects, tourism and cultural activities.

- *Implementation of the National Broadband Plan.*
- *Enhancing international fibre communications links, including full interconnection with fibre networks in Northern Ireland.*
- *Promotion of Ireland as a sustainable international destination for ICT infrastructure and associated economic activities.*
- *Promoting our cities as demonstrators of 5G information and communications technology.”*

Thus, the proposed development, which represents ICT infrastructure development, is supported by the revised NPF, which was published since the lodgement application and the previous appeal responses (and which is the most recent national planning policy document in respect of data centre development).

The revised NPF recognises the digital connectivity, climatic factors, and existing and future renewable energy sources which make the country a sustainable location for ICT infrastructure and associated economic activities. The promotion of Ireland as a sustainable international destination for this infrastructure is an objective of the revised NPF under National Strategic Outcome 6 (A Strong Economy Supported by Enterprise, Innovation and Skills).

RESPONSE

1. Copy of Agreement with the Transmission System Operator

The first item of the section 132 request states the following:

“1. In order to demonstrate that the Transmission System Operator is satisfied that there is sufficient capacity in the national grid to service the development, you are required to provide a copy of the agreement with the Transmission System Operator that clearly demonstrates that you have a fixed connection agreement with the Transmission System Operator to connect the specific data centre buildings the subject of this appeal (i.e., Buildings E, F and G) to the grid.”

In response to this item, Appendix 2 to this response letter comprises a cover letter prepared by Matheson LLP Solicitors ('Matheson') and a copy of the executed connection agreement between the Operator of the proposed development (Amazon Data Services Ireland Limited), and EirGrid, the Transmission System Operator (TSO).

The Matheson cover letter states the following:

“On 17 June 2017, Amazon Data Services Ireland Limited (“ADSIL”) entered into a Transmission Connection Agreement with EirGrid plc (the “Original Connection Agreement”) for connection of a facility with a Maximum Import Capacity of 240 MVA at Cruiserath, Dublin 15 (the “Facility”).

The Original Connection Agreement was amended a number of times, and on 14 February 2025, ADSIL and EirGrid plc entered into a modified Transmission Connection Agreement reflect such amendments (the “Connection Agreement”). The effective date of the Connection Agreement is 17 June 2017, and the Connection Agreement supersedes and replaces the Original Connection Agreement in its entirety.

For the avoidance of any doubt, the Maximum Import Capacity of the Connection Agreement remains 240 MVA as per the position in 2017. We have been provided with a copy of the Connection Agreement.

We have also been provided with confirmation from in-house legal counsel that Universal Developers LLC is part of the same company group as ADSIL, and that the Connection Agreement will be used for the purposes of connecting the specific data centre buildings (the subject of this appeal) to the grid.”

The Matheson cover letter goes on to set out that certain confidential and commercially sensitive information has necessarily been redacted in the copy submitted to the Board, and the cover letter confirms that Matheson were provided with a full unredacted copy of the agreement for verification purposes. The letter confirms that the copy of the Connection Agreement now submitted is a true copy of the original.

The connection agreement confirms that the TSO will provide for a total maximum import capacity (MIC) of 240 mega volts-ampere (MVA) for the subject data centre campus. This includes provision for the following:

- Previously permitted development on the landholding (Reg. Ref.: FW17A/0025 / ABP Ref: PL06F.248544 and Reg. Ref.: FW19A/0087) with a total maximum energy requirement of 87 megawatts.
- The Proposed Development (Buildings E, F, and G), with a total maximum energy requirement of 73.1 megawatts.
- Potential future development on the wider landholding.

The executed connection agreement with the TSO clearly demonstrates that the Operator has a fixed connection agreement with the Transmission System Operator to connect the specific data centre buildings the subject of the appeal (i.e., Buildings E, F, and G) to the grid, as required under the first item of the section 132 request.

The connection agreement provides for the entire energy demand of the permitted, proposed, and potential future development on the landholding to be sourced from the national electricity grid.

The connection agreement applies to the overall campus or ‘demand facility’, however the capacity provided for under the connection agreement is sufficient to power the permitted development, Proposed Development, and potential future development on the wider landholding.

To help enable more effective planning by EirGrid and more efficient use of the grid, AWS sought a revision to the original connection agreement. The revised connection agreement

sought a ramp amendment so that incremental provision of power was provided when required by AWS. The revised connection agreement provides for eight incremental ramps (increases) in power supply to the site, which commenced on energisation and completes in 2029.

The Proposed Development will be supplied from the existing Cruiserath 220kV Substation which is located on the overall AWS landholding. The Cruiserath 220kV Substation was developed by AWS, as a contestable development under Planning Register Reference ABP Reference: VA 06F.306834.

In order to provide additional clarity and comfort to the Board, Appendix 3 comprises a letter from the TSO (EirGrid), which sets out that the connection agreement provides for the connection of ADSIL's campus at Cruiserath. The letter further confirms that the demand of 240 MVA to which the connection agreement relates, has been accounted for in EirGrid's 10-year Generation Capacity Statement / National Resource Adequacy Assessment Methodology.

Finally, the EirGrid letter notes that "*EirGrid has no involvement in the layout or configuration of customer facilities from the point at which the facility meets the transmission system, beyond contracting for their electricity supply.*"

In summary, EirGrid confirms that the connection agreement provides for 240MVA of demand arising from the subject data centre campus, but that the connection agreement doesn't specify the configuration of the campus. As set out above, the connection agreement is sufficient to provide power for the entirety of the permitted development, Proposed Development (i.e. Buildings E, F, and G), and for potential future development on the wider landholding.

Thus, in line with the first item of the Board's section 132 request, it has been clearly demonstrated that there is a fixed connection agreement with the Transmission System Operator to connect the specific data centre buildings the subject of this appeal (i.e., Buildings E, F and G) to the grid. Additionally, as noted above, the demand of 240 MVA to which the connection agreement relates, has been accounted for in EirGrid's 10-year Generation Capacity Statement / National Resource Adequacy Assessment Methodology.

2. Climate Action Plan 2025 and EPA Projections Report

The second item of the section 132 request states the following:

"2. In relation to the environmental impact assessment of the proposed development and the necessity, as set out in the Environmental Protection Agency 2022 "Guidelines on the information to be contained in Environmental Impact Assessment Reports (EIAR)", to identify a reasonably foreseeable worst-case scenario as a context for "likely significant effects" the Board notes

(a) the Climate Action Plan 2025 published on the 15th April 2025 and Section 11.1 Electricity State of Play that "There has been a steady decline in annual emissions from 9.89 MtCO₂eq. in 2021 to 7.56 MtCO₂eq. in 2023. While the EPA Projections Reports 2023-2050 indicates an overshoot of over 1 MtCO₂eq. in the period 2021 to 2025, and an overshoot of over 5 MtCO₂eq. in the second period 2026 to 2030, these are both significant improvements on the projected overshoots (5.2 MtCO₂eq. and 8.2 MtCO₂eq. respectively) set out in the Climate Action Plan 2024".

(b) the aforementioned Environmental Protection Agency Report "Ireland's Greenhouse Gas Emissions Projections 2023-20250" published in May 2024. In particular in the associated document "Input Assumptions for Ireland's Greenhouse Gas Emissions

Projections”, Table 1: Policy Input Assumptions contained modelling assumptions details outline in the With Existing Measures and With Additional Measures scenarios.

In light of the publication of the Climate Action Plan 2025 by Government and Ireland’s Greenhouse Gas Emissions Projections 2023-2050 by the Environmental Protection Agency since the preparation of the Environmental Impact Assessment Report and its addendum, to assist the Board in carrying out its Environmental Impact Assessment you are required to:

- (i) re-affirm, or otherwise, the findings of its environmental assessment in relation to climate based on its modelling assumptions, and*
- (ii) provide details of, and observations regarding, the significant differences that may arise in the emerging context noting the points raised in 2(a) and (b) above.” [Emphasis added].*

(i) Re-affirm, or otherwise, the findings of its environmental assessment in relation to climate based on its modelling assumptions

We refer the Board to the environmental Technical Note in response to Item 2, produced by AWN Consulting (see Appendix 4).

In relation to the first part of this point, the AWN response reviews the contents of CAP 25¹ and its implications for the Proposed Development’s climate impact assessment.

Similarly, the AWN response reviews and takes account of the “*Ireland’s Greenhouse Gas Emissions Projections 2023-2050*”² report published by the EPA (‘the EPA report’) in the context of the previously prepared climate assessment for the project.

Additionally, the AWN response reviews and takes account of the more recently published (May 2025) “*Ireland’s Greenhouse Gas Emissions Projections - 2024-2055*”³ (EPA, 2025), which was published in May 2025, between the issuing of the Board’s current section 132 request and the submission of this response.

The AWN response document also notes that the previously submitted EIAR Addendum on climate impact (which was submitted Planning Authority with the Further Information response on the 2nd of August 2023) has been updated in light of CAP25 and the 2024 and new 2025 EPA reports, along with other relevant new information which has become available since the previous version of the Addendum. The updated EIAR Addendum is submitted as Appendix 5 to this letter.

The AWN response (Appendix 4) and updated EIA Addendum report (Appendix 5) confirm that, having taken into account the updated policy position in CAP25, and the projections contained within the EPA (2024 and 2025) reports for the electricity sector, the impact of the proposed development, during its operational phase, on climate would still be moderate adverse prior to mitigation, and minor adverse after mitigation. This aligns with the conclusion of the climate assessment input submitted with the original response to third party appeals, and to the Board’s previous request under section 131 of the Act.

¹ Link to CAP 25: <https://www.gov.ie/en/department-of-the-environment-climate-and-communications/publications/climate-action-plan-2025/>

² This report had been published prior to the submission of the previous section 131 response to the Board in June 2024, and was referred to in that response. Link to report: <https://www.epa.ie/publications/monitoring--assessment/imate-change/air-emissions/irelands-greenhouse-gas-emissions-projections-2023-2050.php>

³ Link: <https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/irelands-greenhouse-gas-emissions-projections-2024-2055.php>

The AWN response document (Appendix 4) notes that the use of electricity to power the facility will achieve net zero by 2050 and the commitment to offset all interim fossil fuel derived GHG emissions by the purchase of Corporate Power Purchase Agreements (CPPAs) the predicted impact to climate was deemed to be indirect, long-term, negative and minor adverse. Furthermore, the AWN response document (Appendix 4) sets out that even if the national renewable targets are not achieved on time, the facility will ensure that the CPPAs match the GHG emissions from the electricity used to power the Proposed Development on an annual basis to ensure the facility remains net-zero in terms of operational GHG emissions.

The EIAR Addendum on climate (attached in Appendix 5 of this cover letter) has been updated to incorporate the findings of CAP25 and any additional new information which has become available since the previous version of the Addendum. The Addendum has been reviewed in light of the EPA Reports “*Ireland’s Greenhouse Gas Emissions Projections 2023-2050*” and the more recent (May 2025) “*Ireland’s Greenhouse Gas Emissions Projections - 2024-2055*”.

As the 2025 EPA Report forecasts a more pessimistic ‘With Additional Measures’ scenario for the electricity sector, with a 68% reduction in electricity associated GHG emissions between 2018 and 2030 (EPA, 2025), the EIAR addendum has been updated to reflect a reduced level of renewable generation (and consequently a higher carbon intensity) for the electricity sector, in line with the 2025 EPA Report. This updated modelling assumption has been reflected throughout the updated EIAR Addendum prepared by AWN (Appendix 5).

In addition to this change to the modelling of electricity GHG intensity (based on “*Ireland’s Greenhouse Gas Emissions Projections - 2024-2055*”), it is also re-confirmed that the various other modelling assumptions used in the climate assessment remain reflective of a reasonable worst case scenario (in line with the 2022 EPA Guidelines on the information to be contained in Environmental Impact Assessment Reports), including in relation to the opening year of the development (which is now likely to be beyond 2025, but which has been maintained at 2025 for the purposes of the assessment to provide for an assessment of a reasonable worst case), the carbon intensity of grid electricity, the absence of any assumption of ramping in the development’s demand, and the assumption that the development would continually operate at 100% of its capacity.

The updated EIAR Addendum Report (Appendix 5) states that “*should the facility open in Year 2027 rather than Year 2025, this will lead to a reduction in GHG emissions in the first year of operation of approximately 21,600 tonnes of CO₂eq. In addition, should the Proposed Development operate at 50% of the maximum load in the first year of operation (assumed to be Year 2025), this will lead to a reduction of approximately 70,700 tonnes of CO₂eq in Year 2025*”. However neither of these potential scenarios have been relied on for the purposes of the assessment of impacts, in order to ensure that a reasonable worst case scenario is assessed.

Thus, the assessment adopts a reasonably foreseeable worst-case scenario as a context for ‘likely significant effects’, but nonetheless concludes that, following mitigation, the effect of the proposed development on climate will be minor and not significant.

(ii) provide details of, and observations regarding, the significant differences that may arise in the emerging context noting the points raised in 2(a) and (b) above.

With regard to the potential differences in the emerging context identified in CAP 25 and the EPA reports “*Ireland’s Greenhouse Gas Emissions Projections 2023-2050*” and the more recent (May 2025) “*Ireland’s Greenhouse Gas Emissions Projections - 2024-2055*”, the

accompanying AWN response (Appendix 4) provides a review of the different scenarios set out, focusing on the with existing measures (WEM) and with additional measures (WAM) scenarios addressed in the EPA reports.

For the 2024 EPA report, these scenarios were as follows:

- The WEM scenario assumes that Irelands Energy Industries sector reaches 60% renewable energy generation by 2030 and that there will be an associated 57% reduction in electricity associated GHG emissions between 2018 and 2030.
- The WAM scenario assumes that Ireland's target of 80% renewable electricity generation will be reached by 2030, and that there will be an associated reduction of 66% in emissions from the Energy Industries sector.

For the 2025 EPA report, these scenarios were as follows:

- The WEM scenario assumes that Irelands Energy Industries sector reaches 68.9% renewable energy generation by 2030 and that there will be an associated 59% reduction in electricity associated GHG emissions between 2018 and 2030.
- The WAM scenario assumes that Ireland's target of 68.3% renewable electricity generation will be reached by 2030, and that there will be an associated reduction of 68% in emissions from the Energy Industries sector.

As set out above, the assessment in the updated EIAR Addendum Report (Appendix 5) has been updated to take account of the lower predicted level of renewables in 2030 within the 2025 EPA report (i.e. 68.3% under the WAM scenario, rather than the 80% which had been assumed in the previous iteration of the Addendum).

The AWN response document (Appendix 4) goes on to compare the data underpinning the two scenarios in the 2024 EPA Report, as provided in the companion document to the EPA report ("*Input Assumptions for Ireland's Greenhouse Gas Emissions Projections*"), and provide observations in relation to the role of interconnectors in supporting the reported reductions in GHG emissions from electricity generation in recent years. A similar comparison of the data underpinning the two scenarios in the 2025 EPA Report is not possible as the 2025 EPA comparison report is not yet published.

The AWN response document (Appendix 4) goes on to state that "*The Proposed Development will not contribute to any exceedance of the sectoral emissions ceiling for the electricity sector, as the proposed development is included under existing electricity demand forecasts, and will bring forward renewables for contracted demand which is already accounted for within CAP 24. The Electricity sector has an emission ceiling of 40 Mt CO₂eq for the first carbon budget period (2021–2025), with the EPA's 2023 provisional greenhouse gas inventory reporting that 67.9% of the sectoral emissions ceiling has been used in the first 3 years of the first carbon budget. The recently published Climate Change Advisory Board Annual Review 2025: Electricity (CCAB, 2025), based on the EPA's 2023 data combined with the latest emissions data from the EU ETS for 2024 estimated that 83.6% of the sectoral emissions ceiling has been used in the first 4 years of the five-year sectoral emissions period. Thus, 2024 used 15.7% of the sectoral budget and if 2025 has emissions of a similar magnitude it is likely that the first carbon budget period (2001-2025) will be approximately 99% of the budget and thus in compliance.*"

Thus, while the assessment does take into account differences that may arise in the emerging context (i.e. uncertainty), the Proposed Development will not contribute to any exceedance of the sectoral emissions ceiling for the electricity sector.

In addition to the overall AWN response document, the accompanying EIAR Addendum report on climate (Appendix 5), the review of uncertainty technical note (Appendix 6), and the updated assessment of compliance with section 15 of the Climate Action and Low Carbon Development Act (Appendix 7) each take account of, and comment on, the contents of CAP 25 (including the reference to improvements in terms of predicted overshoot of emissions targets for the electricity sector (CAP 25, Section 11.1 Electricity State of Play)), and the most recent EPA Report "*Ireland's Greenhouse Gas Emissions Projections - 2024-2055*".

CONCLUSION

This response to the request for further submissions under section 132 of the Act is submitted on behalf of the applicant, Universal Developers LLC.

The response is accompanied by a copy of the Operator's executed connection agreement with the TSO, and a letter provided by the TSO (EirGrid), which confirm that the connection agreement provides sufficient power to serve the Proposed Development in its entirety, along with the already permitted and potential future phases of development within the applicant's landholding.

As set out in this response document, and further substantiated by the technical response provided in the accompanying appendices, the climate impact assessment documentation prepared in respect of the Proposed Development is robust and the conclusions of that assessment have not changed on foot of the publication of CAP 25 and the EPA report on "*Ireland's Greenhouse Gas Emissions Projections 2023-2050*", albeit the assumptions underpinning the climate modelling have been updated to take account of the lower predicted level of renewables by 2030 in the more recently published "*Ireland's Greenhouse Gas Emissions Projections - 2024-2055*", which was published by the EPA after the Board issued the current section 132 request.

The various scenarios and predictions in these documents as to the projected performance of the electricity sector vis a vis the established decarbonisation targets are also commented on and reviewed in detail within the accompanying documents prepared by AWN.

The application has demonstrated the compliance of the proposal with national, regional, and local planning policy, and with relevant Government policy including the Climate Action Plan 2025, and each of the other policies referred to under section 15 of the Climate Action and Low Carbon Development Act, as amended.

The Proposed Development entails significant and effective mitigation measures to address climate impact, and the result is a development which will have no significant impact on climate, and which will support the delivery of additional renewable energy capacity in line with Government policy.

We trust the Board will afford the responses set out herein due consideration in determining the appeals. Should you have any queries or require any further information please do not hesitate to contact the undersigned.

Yours sincerely,



John Spain Associates

APPENDIX 1 – COPY OF CORRESPONDENCE FROM AN BORD PLEANALA

APPENDIX 2 – MATHESON LLP SOLICITORS LETTER AND COPY OF CONNECTION AGREEMENT WITH EIRGRID

APPENDIX 3 – LETTER FROM EIRGRID IN RELATION TO CONNECTION AGREEMENT

APPENDIX 4 – AWN CONSULTING TECHNICAL RESPONSE NOTE

**APPENDIX 5 – AWN CONSULTING EIAR CLIMATE IMPACT ASSESSMENT
ADDENDUM**

APPENDIX 6 – AWN CONSULTING ASSESSMENT OF UNCERTAINTY

**APPENDIX 7 – AWN CONSULTING AND JOHN SPAIN ASSOCIATES SECTION 15
COMPLIANCE STATEMENT**

APPENDIX 8 – AWS LETTER OF INTENT IN RELATION TO THE BLANCHARDSTOWN DISTRICT HEATING SCHEME