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19th October 2026

An Coimisiún Pleanála

64, Marlborough Street,

Dublin 1

AN COIMISIÚN PLEANÁLA
LDG- 090734-26
ACP-
21 OCT 2026
Fee: € 50 Type: Chq
Time: 10:17 By: Hand

Dear Sir / Madam,

RE – ACP REF. OA29N.319866-24 (ABP-319866-24) PROPOSED DEVELOPMENT KNOWN AS NORTH IRISH SEA ARRAY ("NISA") OFFSHORE WIND FARM LOCATED OFF THE COAST OF COUNTIES DUBLIN, MEATH AND LOUTH (www.northirishseaarraysid.ie) - SUBMISSION OF SIGNIFICANT ADDITIONAL INFORMATION

1.0 INTRODUCTION

1.1 This is an objection by Lagan Homes Balbriggan Limited (LHBL) of Blanchardstown Corporate Park, Block 10-4, 1st Floor, Dublin 15 D15X98N against the above proposed development.

1.2 The Objection has been prepared by Stephen Ward Town Planning and Development Consultants Limited of Jocelyn House, Jocelyn Street, Dundalk, County Louth A91A03Y on behalf of Lagan Homes Balbriggan Limited.

1.3 Please find enclosed required fee in the sum of €50.

1.4 This Planning Statement of Objection is accompanied by the following documents and drawings and all of these documents and drawings together with the Statement of Objection form the applicant's Objection –

1. Landscape and Visual Impact Assessment (LVIA) by Purser and Associates.
2. Verified Photomontages by 3D Design Bureau.
3. Acoustic Review by Amplitude Acoustics.
4. Cross-section drawings by JFOC Architects

1.5 This Planning Statement of Objection and the associated Reports and drawings as set out above contains the reasons, consideration and arguments on which the submission is based in full and includes the implications of the proposed development for proper planning and sustainable development.

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1.6 Please address all correspondence in the matter to Stephen Ward Town Planning and Development Consultants Limited at the above stated address.

2.0 LAGAN HOMES AND RESIDENTIAL DEVELOPMENT ON THE FLEMINGTON LAP LANDS

2.1 In December 2024 Fingal County Council adopted the Flemington Lane Local Area Plan (LAP). The Plan lands extend to 17.2 hectares. In 2025 Lagan Homes purchased the entirely of the LAP lands. These are identified on the drawing below relative to the NISA Grid and GIS Facility. Immediately on purchasing the lands LHBL proceeded to prepare planning applications for residential development of its lands. The Company has now lodged a Large Scale Residential (LRD) application for 146 dwellings on the western portion of its lands (PA Ref. No. LRD0107/S3E) and has completed an LRD meeting for a residential development of 440no. dwellings and a local centre on the balance of its lands (LRD0090). In summary, LHBL has quickly moved the entirety of the Flemington Lane LAP lands into the planning system in a very short period of time.



2.2 Lagan Homes has a track record of moving its sites forward in the planning system at a very quick pace and commencing construction of houses immediately on receipt of planning permission. Examples here include – Old Slane Road in Drogheda where permission was granted in December 2023 and construction commenced in 2024, Fairyhouse Road in Ratoath where planning permission was granted in December 2025 and construction had commenced by the end of January 2026 and Athlumney in Navan an LRD where permission was granted in January 2026 and construction commenced in February 2026.

3.0 THE NATURE AND EXTENT OF THE LHBL OBJECTION

3.1 At the outset LHBL wishes to make clear it does not object to the principle of the proposed development. LHBL wishes to focus its objection and object in the strongest possible terms to the positioning of the proposed Bremore substation element of the grid facility abutting its Flemington LAP lands. It is submitted that the Bremore substation elements of the NISA proposed development would have a severe negative impact on the residential and visual amenities of future occupants of the Flemington Lane LAP lands.

3.2 We set out below our objections to that substation element of the proposed development. It is contended there is adequate land within and immediately abutting the Grid Facility area of the site for the Bremore Substation infrastructure, including buildings, to be moved north, away from the boundary of the LAP lands and there is no sound or justifiable planning reason why this cannot be done. The sections of the applicant EIAR dealing with consideration of alternatives is inadequate in this regard. This is elaborated further in this Objection Statement.

3.3 LHBL wishes to state, given the level of concern the Company has, it reserves its right to seek recourse by all available regulatory and legislative means.

3.4 Lagan Homes met with representatives of the applicant in 11th of March 2026 to explain its concerns regarding the proximity of the Bremore substation element of the proposal to the residentially zoned lands. By reference to the applicant's further information (FI) response, it is evident the applicant has chosen not to take account of the concerns expressed by Lagan at its meeting with the applicant in March, 2026.

3.5 The NISA application was lodged with An Coimisiún Pleanála (ACP) in June 2024. On the 10th April 2025 ACP sought further information (FI) from the applicant. The applicant submitted the FI on the 29th of August 2026. In late August 2026 new public notices were published informing the public that the applicant had submitted the FI and providing a period ending on 21st October 2026 for submissions to be made on the applicant's FI submission.

4.0 THE ACP FURTHER INFORMATION REQUEST AND THE FLEMINGTON LANE LAP LANDS

4.1 As noted, ACP sought further information from the applicant in April 2025. Item 13e) of the FI Request states as follows –

"The GIS substation building at Bremore is located adjoining lands zoned for residential development, which are the subject of a recently published draft Local Area Plan, 'draft Flemington LAP, September 2024'. It is stated within the submitted Planning Report (section 6.7.2.3) that at the time of lodgement of the application a consultation paper only was available which was insufficient to enable the applicant to assess the proposed development's compliance with the objectives of the Flemington LAP. The applicant is requested to review the draft LAP (or adopted LAP, where updated at time of this observation) and update the submitted application documentation accordingly, having regard in particular to potential visual impacts from the substation on the draft LAP lands, potential traffic implications given the proposed access to the LAP lands directly adjoins the proposed access to the substation, and potential noise implications from the substation on the adjoining residential zoned lands".

4.2 Prior to dealing with the response of the applicant to the ACP FI Request, LHBL wishes to raise a matter concerning the siting of the Bremore substation and the adequacy of its assessment.

5.0 THE SITING OF THE BREMORE SUBSTATION AND THE ADEQUACY OF ITS ASSESSMENT

5.1 The application is made under section 291 of the Planning and Development Act 2000, as amended. LHBL does not dispute the jurisdiction of An Coimisiún to determine the application, including its onshore elements. LHBL's concern is the siting of the Bremore 220kV Substation and the adequacy of its assessment.

5.2 At Section 5.7.3 of Chapter 5 of the EIAR (p. 5-39), the applicant states that *"EirGrid's decision on the Bremore location was also driven by its requirement as the TSO to future proof the transmission network and to design the Bremore 220kV Substation (part of the proposed grid facility) to accommodate potential future connections from other projects (e.g. other renewable energy generators, electricity demand customers or grid services infrastructure).".* On the applicant's own account, therefore, the location, design and scale of that substation are driven in part by the requirements extending beyond the proposed wind farm. LHBL submits that:

(a) Article 5(1)(d) and Annex IV, paragraph 2 of Directive 2011/92/EU (as amended by Directive 2014/52/EU) require a description of the reasonable alternative studies by the developer, including as to location, and an indication of the main reasons for the option chosen, including a comparison of environmental effects. The EIAR records that the location and fundamental design of the grid facility were specified by EirGrid. In the absence of any comparison of the environmental effects of alternative positions for the Bremore substation building and shunt reactor compound within the grid facility lands, further from the residentially zoned Flemington LAP lands, the EIAD does not disclose the main reasons, taking into account the effects of the environment, for the siting of that element immediately adjoining those lands.

(b) Where the substation is designed for future connections, the EIAR should identify the additional bays, plant or buildings anticipated, where they would be located and the likely effects on the adjoining LAP lands. It does not.

(c) The applicant has not explained why an element whose scale is driven in part by future network requirements must be sited at the southern edge of the grid facility lands, immediately adjoining the LAP lands.

5.3 These matters are addressed further below. LHBL's request to An Coimisiún arising from them is set out in the Conclusions to the Objection.

5.4 The Decommissioning proposals for the Bremore Substation also differ from those for the wind farm as is evidenced from the EIAR extract below -

> **7.7 Decommissioning**
>
> The operational life of these assets will be approximately 35 years. Once the proposed development has reached the end of its operational life it is anticipated it will be decommissioned or repowered. However, the infrastructure from the grid facility to the existing Belcamp substation will be under the ownership of ESB Networks and operated by EirGrid, forming part of the Transmission System and therefore will not be decommissioned.
>
> The compensation substation at the Grid Facility will be decommissioned when the proposed development ceases operation: however, the Bremore substation will not as it will form part of the wider transmission network owned by EirGrid.
>
> When it becomes appropriate to decommission the proposed development, all above ground structures (i.e. access track, marker posts, link) between the TJBs at the landfall and the grid facility will be removed, and the sites will be returned to their previous state. It is not proposed to remove any planting. The cabling of the onshore export cable between the TJBs and the grid facility will be removed but below ground ducting will remain in place.
>
> Items / equipment which are decommissioned will be removed for appropriate management, based on the waste regulations at the time of decommissioning.

5.5 Given the applicant's own admissions in its FI response that the southern Substation (abutting the Flemington LAP lands) will have negative impacts on the future occupiers of dwellings on the LAP lands, we submit it is imperative that ACP has full clarity as to why the substation is positioned abutting the LAP lands and in such close proximity to proposed dwellings. It is respectfully submitted that the applicant has had sufficient opportunity to reposition the substation and has chosen not to take this opportunity. There is no solid planning reason provided by the applicant as to why the Bremore substation element of the GIS must be positioned where it is proposed. Arguments such as access to the building from the road for EirGrid being more convenient or engineering reasons are not sustainable reasons to justify placing a new extremely large and bulky structure abutting a new residential area.

6.0 THE RESPONSE OF THE APPLICANT TO ITEM 13e) OF THE ACP FI REQUEST

6.1 It is noteworthy that ACP requested the applicant to fully review the potential impact of the proposed development on the development of the LAP lands, with particular emphasis of visual impacts, traffic impacts and noise impacts. The applicant has failed to undertake a complete review of potential impacts, having limited its response to visual, traffic and noise only. As far as adjustments are concerned, the applicant makes minor, insignificant and ineffectual adjustments that boil down to changing the colour of the cladding to the building and additional hedge planting. There is no consideration of alternatives.

7.0 THE PROPOSED BREMORE SUBSTATION FACILITY IS IN MATERIAL CONTRAVENTION OF THE ZONING OBJECTIVE AFFECTING THE GRID FACILITY PART OF THE APPLICATION SITE

7.1 Notwithstanding the "have regard to" provisions of the Act (s.293(3)(e)), it is contended that the proposed Bremore substation facility is a material contravention of the zoning objective and the provisions of the Development Plan that seek to ensure quality residential amenities, no more so than where a more impactful activity (such as an industrial undertaking) is positioned next to a more sensitive land-use, such as a residential development with associated public open space.

7.2 At no point in the applicant's planning documentation does the applicant provide a reasoned justification that the southern substation (Bremore substation) must be positioned where it is proposed in the application and that there is no alternative location where it can be accommodated, further from the LAP lands.

7.3 We submit and contend that the term "Utility" as contained and defined in the Fingal Development Plan does not extend to embrace the type of development as proposed under the Bremore substation Facility element of this application.

7.4 Appendix 7 to the Fingal Development Plan is entitled "Technical Guidance Notes" and provided definitions for the adopted use classes relating to the zoning objective. It states – *"These technical guidance notes are to be used in the context of the adopted use classes relating to zoning objectives as set out in Chapter 13 of this Plan".* Appendix 7 defines "Utility Installations" as *a structure composed of one or more pieces of equipment connected to or part of a structure and/or facility designed to provide a public utility service such as the provision of heat, electricity, telecommunications, water or sewage disposal and/or treatment".*

7.5 Discussions within the Development Plan with respect to Utility installations are found primarily at Sections 14.4.9 and 14.20.11. It is submitted that within these what is meant by the use of the term "utility" is clear. The discussion revolves around how items directly associated with residential developments should be incorporated such that they do not cause harm to the public realm or the residential amenities of the area. These items would include standard type cabinets such as electricity substations serving residential areas, mini-pillars or telecommunication equipment cabinets.

7.6 The Development Plan advice further confirms this is what is meant by 'utility facilities' with Objectives, such as Objective DMSO17 that states – *"Where possible, new utility structures such as electricity substations and telecommunications equipment cabinets should not be located adjacent or forward of the front building line of buildings or on areas of open space".*

7.7 Section 14.20.11 of the Development Plan also deals with overhead cables and utility facilities and mirrors the content of Section 14.4.9 in terms of the discussion on the type of structure that is meant when discussing utility facilities.

7.8 To support our submission that the use of the term "Utility Installation" as permitted in principle under the RU Zoning that affects the Bremore substation Facility for the NISA application, does not mean the type of development proposed by NISA on this RU zoned lands, but to much smaller and more standard utility facilities, we note that "Utility Installation" is in the Permitted in Principle category under many zoning objectives, including 'C1' Community Infrastructure, 'FP' Food Park, 'LC' Local Centre, 'MC' Major Town Centre, 'RA' Residential Area, 'RS' Residential, 'RU' Rural, and 'RV' Rural Village.

7.9 It is submitted it is inconceivable to envisage that the correct interpretation of the meaning of "Utility Installation" is a facility of the type proposed for the Grid Facility under the NISA application. To accept this premise is to accept that a structure of the scale of the Bremore substation facility is permitted in principle in existing residential areas, major town centres, local centres and rural villages, for example.

7.10 A full reading of the Development Plan can only, we submit, logically conclude that the use of the term "utility installations" in the Zoning Matrix of the Plan means small-scale utilities such as substations serving housing areas, mini-pillars and telecommunications cabinets, needed to serve local developments and not large-scale development of a clearly industrial scale as proposed.

7.11 We note the statement at Section 13.1 of the Development Plan that states – "Uses which are neither 'Permitted in Principle' nor 'Not Permitted' will be assessed in terms of their contribution towards the achievement of the zoning objective and vision". We strongly contend it stretches any reasonable logic beyond breaking point to argue that the Grid facility element of the proposed development makes a contribution towards the RU zoning objective. It was never the intention of the term "utility installations" to provide carte blanche for developments of the scale proposed here, which displays all the characteristics of a large industrial development, to be located in areas zoned 'Rural Area'.

7.12 We submit that the wording of the RU Objective and Vision for the Objective are also highly relevant to the intention of the Objective. These are set out at Page 510 of the Development Plan. The objective for the RU zoning is stated as –

"Protect and promote in a balanced way, the development of agriculture and rural-related enterprise. Biodiversity, the rural landscape and the built and cultural heritage".

7.13 The Vision for the RU zone is stated as –

"Protect and promote the value of the rural areas of the County. This rural value is based on:

- *Agriculture and rural economic resources.*
- *Visual remoteness from significant and distinctive urban influences.*
- *A high level of natural features.*

7.14 Agriculture and rural related resources will be employed for the benefit of the local and wider population. Building upon the rural value will require a balanced approach involving the protection and promotion of rural biodiversity, the promotion of the integrity of the landscape, and enhancement of the built and cultural heritage".

7.15 An examination of the permitted in principle uses in the RU zone reveals that all such uses are low impact and low key. By contrast the not permitted uses are all those with potential for significant impact.

7.16 Having regard to the above it is strongly contended that there is nothing attached to the RU zoning in the statutory Development Plan affecting the lands that would allow the Bremore substation facility as proposed to be accommodated on that part of the application site proposed for that facility as a permitted in principle use.

7.17 In terms of material contravention we submit that such can only be applied following robust assessment of all alternative uses and locations. No such assessment has taken place thus far and, in that context, it is not appropriate to retrofit an argument to facilitate the Grid Element of the proposed development even on the basis of a project that some might consider 'too big to fail'.

7.18 It is evident by reference to both the submissions of the applicant and the LVIA submitted with this Objection, that the Bremore substation element is a large-scale, significant and imposing element, including the building that will contain the substation. It is submitted there is no stretch to the imagination that can lead to a logical and reasoned conclusion that the substation building which is 61m x 18.5m x 17m (GIS substation 2) with a wider footprint of 50m by 115m (including shunt reactor) with associated fenced in compounds, roads, cables and associated infrastructure and lighting could fall to be considered as in keeping with and contribute to the achievement of the RU Zoning objective that affects the Bremore substation part of the application site.

7.19 This needs to be called out for what it is and that is a large scale industrial proposal located in a rural area of the County in an area zoned for low key and low impact rural development proposals.

8.0 THE PROPOSED BREMORE SUBSTATION FACILITY IS IN MATERIAL CONTRAVENTION OF THE TRANSITIONAL ZONAL AREAS OBJECTIVES OF THE DEVELOPMENT PLAN

8.1 Section 13.2 of the Development Plan considers transitional zonal areas. The Plan is clear; it states –

"The Development Plan maps show the boundaries between zones. Whilst the zoning objective and control standards indicate the different uses permitted in each zone, it is important to avoid abrupt transitions in scale and use in the boundary areas of adjoining land use zones. In dealing with development proposals in these contiguous transitional zonal areas, it is necessary to avoid development that would be detrimental to the amenities of the more environmentally sensitive zone. For instance, in zones abutting residential areas abutting residential development within predominantly mixed-use zones, particular attention must be paid to the use, scale and density of development proposals in order to protect the amenities of residential property".

8.2 Following the above explanatory text the Plan sets out the following objective –

"Objective Z02 – Transitional Zonal Areas – Having regard to development in adjoining zones, in particular, more environmentally sensitive zones, in assessing development proposals for lands in the vicinity of zoning boundaries"

8.3 The Development Plan makes it abundantly clear that it is important to avoid abrupt transition in scale and use between development zones and that development proposals need to ensure they do not have a detrimental impact on the amenities of the more environmentally sensitive zone. It is clear that the Bremore substation facility, that abuts the Lagan residential development lands is in direct breach on Objective Z02 of the Development Plan and to general Development Plan policies in relation to transitional zones. It is evident that placing a development of the type proposed, which is essentially a large-scale industrial development juxtaposed with a residential development of much smaller scale houses does not comply with Objective Z02. As confirmed by the Purser LVIA, and by the applicant's own revised LVIA, the proposed building would be large and bulky and would have a negative impact.

8.4 The concluding section (Section 7) of the LVIA that forms part of the applicant's objection states as follows with respect to the Grid facility – *"The resulting landscape affect is assessed as Very Significant and Negative"* and *"The CGI visualisations further demonstrate the consequences for future residential receptors. From the closest dwellings, the Grid facility would be experienced at very close range as an overwhelmingly dominant and overbearing element in the outlook. Very high magnitudes of visual change and Profound / Very Significant and Negative visual effects are identified from closest first-floor residential receptors. A Very Significant and negative effect is also identified from the proposed public open space".*

8.5 The Purser LVIA, referencing the applicant's FI Response states that the applicant itself also considers that the Grid facility and particularly the southern-most building would be "tall and bulky"; accepts that the southern substation building could appear "imposing" from the nearest portions of the LAP lands; and identifies a High magnitude and Major significant visual effect in the immediate vicinity".

8.6 It is our submission that there is no reasoned justification in terms of the proper planning and sustainable development of the area, to position the southern substation abutting the northern boundaries of the LAP lands. We submit it is positioned there for ease of construction and for servicing convenience. There is no good reason why it cannot be moved a significant distance from the LAP boundary.

9.0 CONSIDERATION OF ALTERNATIVES - NO 'FIRST PRINCIPLES' ASSESSMENT FOR POSITIONING THE BREMORE SUBSTATION ABUTTING THE FLEMINGTON LAP LANDS

9.1 It is, to say the least, disconcerting that there is no 'first principles' assessment by the applicant as to why the Grid Facility and particularly the Bremore Substation Building is positioned abutting the Flemington Lane LAP lands. This, we submit is a material omission by the applicant, especially with regard to Development Plan policies for utility installations and also transitional zoning areas. This is especially the case given, in our contention, that the Grid facility element of the proposed development is a material contravention of not only the zoning objective affecting the lands, but many Development Plan objectives relating to rural areas.

9.2 It is evident from Chapter 5 of the EIAR (Consideration of Alternatives) that the location for the Grid Facility was determined by the operational and engineering requirements of EirGrid and these were accepted by the applicant and then incorporated into the planning application. Section 5.7.3Chapter 5 of the EIAR (p. 5-39) states –

"In this case, EirGrid determined that a location close to Bremore in north county Dublin is required for this purpose. The grid facility will comprise two substations - the NISA 220kV Compensation Substation and the Bremore 220kV Substation".

9.3 We ask An Coimisiún to note that, on the applicant's own account, the location and design of the Bremore 220kV Substation were driven in part by the requirements extending beyond the proposed wind farm. At section 5.7.3 of Chapter 5 of the EIAR (p.5-39) the following is stated –

"EirGrid's decision on the Bremore location was also driven by its requirement as the TSO to future proof the transmission network and to design the Bremore 220kV Substation (part of the proposed grid facility) to accommodate potential future connections from other projects (e.g. other renewable energy generators, electricity demand customers OR grid services infrastructure). As such, the proposed development was designed to comply with these requirements and this is consistent with the approach taken in grid facility site selection."

9.4 It goes on to state –

"With this in mind, this section describes the reasonable alternatives considered during the evolution of the grid facility (onshore substation) location selection process and the main reasons for the site selected, taking into account the effects on the environment"

9.5 It is submitted that even the wording to the above paragraphs of Chapter 5 of the EIAR demonstrates a strong element of pre-judgement of the outcome of the site selection process and the consideration of alternatives. Furthermore, the outcome is further prejudged by only comparing the option of locating it on High Amenity and Open space zoned land versus Rural RU zoned land. It is submitted that there is a certain inevitability that RU zoned lands would be preferable to HA for OS zoned lands. It is not a fair and balanced comparison.

9.6 There is no discussion of the consideration of alternative uses for the Bremore substation or implications of positioning the facility on either adjacent existing land-uses for future potential land uses. The conclusion of the EIAR with respect to the chosen site states – *"Grid facility site 2 was clearly preferable from a land use zoning perspective".* This conclusion is somewhat predictable and inevitable when it is considered that the preferred location compares HA and OS zoned lands with RU zoned lands.

9.7 We respectfully submit there is only ever going to be one 'winner' in the applicant's consideration of alternatives in the way they have been approached in this case. Furthermore, there is no assessment of whether the applicant's preferred location for the Grid Facility represents best use of land. The lands are immediately abutting the planned expansion area of Balbriggan and, we submit, are well suited to future northernly expansion of the settlement. The applicant should have considered alternative land-use possibilities for these lands.

9.8 It is evident that the location, design and scale of the Bremore substation were determined by EirGrid by reference to a far wider network objective than the proposed wind farm. That does not relieve the applicant of the obligation to justify, in environmental terms, the siting of that element immediately adjoining the LAP lands. Rather, it make the justification all the more necessary.

9.9 The applicant's own EIAR states that it is required by EirGrid to *"future proof the transmission network"*. The EIAR does not, however, identify what additional bays, plant, compounds or buildings that future proofing anticipates, where within the grid facility lands they would be located, or their likely effects, including cumulative effects, on the adjoining LAP lands. The EIAR is seriously flawed as it does not assess the potential impacts of substation 2 (Bremore) in terms of what its actual purpose and function is.

9.10 We ask An Coimisiún to note that it is the siting of substation 2 (Bremore Substation) immediately adjoining the LAP lands that Lagan Homes Balbriggan Ltd objects to.

10.0 THE LAND-SIDE SITE SELECTION PROCESS FOR THE BREMORE SUBSTATION

10.1 It is submitted that the applicant has made a fatal error in deciding that the proposed development falls to be considered as a "utility installation" and is therefore permitted in principle under the RU Zoning. We have set out in detail at Sections 7 and 8 of this Objection Statement why the substation elements and associated uses do not comply with the RU zoning provisions; not least given the large-scale industrial nature of the buildings and structures proposed. These cannot possibly, we submit, contribute to achieving the vision or objectives for the RU zoning objective. The Bremore substation is completely unrelated to any RU zoning or policy objective.

10.2 According to the Addendum to the Non-technical Summary as submitted at FI stage, no changes are proposed to those sections of the EIAR dealing with the Landfall Site Selection (Para. 4.3.2) or Grid Facility Site Selection (Para. 4.3.3). These sections again repeat the thought process behind the site selection decision for the Grid Facility. That essentially is, that it was located and designed to meet the requirements of EirGrid. Meeting the requirements of the transmission system operator is not, of itself, a substitute for a comparison of the environmental effects of reasonable alternatives. The extent to which the requirements of EirGrid dictated the site selection for the Grid Facility is explicitly stated at Page 13 of the Addendum NTS where the following is stated –

"The location and fundamental design of the grid facility were specified by EirGrid and stipulated by the provisions of the Grid Connection Assessment. EirGrid carried out studies of the transmission system to determine the most suitable location to connect renewable energy projects"

And (Pg14)

"EirGrid's decision on the Bremore location was also driven by its requirement as a transmission system operator to future proof the transmission network and to design the Bremore 220kV substation (part of the proposed grid facility) to accommodate potential future connections from other projects e.g. other renewable energy generators, electricity demand customers or grid services infrastructure"

10.3 Page 14 of the NTS Addendum explicitly states – *The proposed development was designed to comply with EirGrid's requirements".*

10.4 By the applicant's own admissions, the location and design of the grid facility, and particularly the Bremore substation, has been dictated by EirGrid to suit perhaps the operational and engineering requirements of EirGrid. This, we submit, exposes a fundamental failing of the site selection process for the grid facility; the location of the Bremore facility is dictated by the requirements of EirGrid, and not, as it should be by an environmental assessment of the site and alternative sites and uses of the site the applicant (or rather EirGrid) selected for the Bremore substation facility. It is disconcerting to read that the location of the Bremore substation facility was dictated by an organisation not involved in the planning application and that the applicant already knew the required location of the grid facility prior to undertaking the site selection process.

10.5 LHBL is also extremely concerned that the positioning of the Bremore Substation abutting the southern part of the grid facility would set an extremely undesirable precedent for other such facilities to be sought along the southern boundary of the site. There are large open areas located between the proposed substation and the R132. These would then abut the northern boundary and the houses contained in the Flemington LAP area. This concern of LHBL is given added weight by the statements in the planning application that the proposed Bremore substation is proposed to "future-proof" EirGrid's requirements and to take account of future as yet unknown proposals for electricity generation and distribution. As noted, there is no assessment of the cumulative effects of these future EirGrid requirements as part of this planning application, even though substation 2 is designed to accommodate them.

11.0 CONCLUSIONS

11.1 We submit it is remarkable that in spite of the detailed FI Request issued by ACP and the voluminous response of the applicant, in the end, whilst there are some engineering and construction adjustments, there are no material changes to the land-side planning aspects of the project as originally submitted.

11.2 Whilst Lagan Homes Ballbriggan Ltd does not object to the proposed off-shore elements of the windfarm, it wishes to object in the strongest possible terms to the Bremore substation as is currently proposed abutting the residential development on the Flemington Lane LAP lands, immediately to the south of the proposed Grid facility.

11.3 It is contended that the industrial nature, sheer size and scale of the proposed Bremore substation facility places it well outside anything that could reasonably be considered acceptable under the RU zoning, vision or objective. It is submitted the proposed development could not possibly contribute to meeting the RU zoning objectives. A reasoned reading of the term "utility installation" in the County Development Plan is that it is a small-scale facility such as a small substation, mini-pillar or telecommunications cabinet found in most residential development areas.

11.4 The scale of the proposed Bremore facility places it firmly in the category of a major industrial development. It may be that the type of facility proposed is not in fact covered by any of the uses contained in the various zoning categories and therefore should be considered as a sui generis use. Such a use may be acceptable on industrially zoned lands but we suggest it is not reasonable to conclude that a development of the scale proposed should be permitted in principle in a rural area or a residential development area.

11.5 We submit that the consideration of alternatives and site selection processes in the EIAR are deeply flawed. It transpires that it was in fact EirGrid that dictated the location for the Bremore substation facility based on its own requirements, none of which appear based on environmental criteria. We also express grave concern regarding the shunt reactors associated with both the Bremore and the Compensation substations and we request ACP seeks further details on the potential impacts of noise from these, even with proposed mitigating measures on the residential amenities of future occupiers of dwellings on the Flemington LAP lands.

11.6 It is also submitted that the location, design and scale of the Bremore substation were dictated by EirGrid's wider network requirements, and that the applicant has not justified, in environmental terms, siting it immediately adjoining the LAP lands.

11.7 It also transpires that the Bremore substation is proposed to "future-proof" possible but unspecified future electricity generation and distribution requirements for other possible proposals that might emerge. This gives rise to grave concern as not only does the proposed substation give rise to serious harm to the visual and residential amenities of the future occupiers of houses in the Lagan Homes development but also now gives rise to the prospect that there are other such substations that could be proposed in the extensive vacant area of land south of substation 1 and east of proposed substation 2 and positioned along the southern boundary of the grid facility mirroring the proposed Bremore substation.

11.9 LHBL respectfully requests that, before making is decision, An Coimisiún exercise its power under section 292(1)(b) of the Planning and Development Act 2000, as amended, to inform the applicant that it is considering granting permission subject to revised plans relocating the Bremore 220kV Substation building and shunt reactor compound northwards, away from the boundary of the Flemington LAP lands. Such relocation may also require design and layout changes to the compensation substation such that no part of either substation or associated infrastructure is positioned within 135.36 metres of the northern boundary of the Flemington LAP lands

11.10 In the alternative, should An Coimisiún be minded to grant permission for the proposed development, LHBL requests that conditions be attached (i) requiring the relocation northwards of the Bremore substation, and (ii) providing that no electrical infrastructure, including substations extend further south than the southern boundary of compensation substation as submitted for planning permission and the area between the southern boundaries of the substations and the northern boundary of the Lagan lands be left free of any development. In any event, no part of either substation or associated infrastructure to be positioned within 135.36 metres of the northern boundary of the Flemington LAP lands.

11.11 The drawing Below illustrates the requests of LHBL as set out in a paragraphs 11.9 and 11.10 above.



Yours faithfully,

Stephen Ward

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Appendix A – Landscape & Visual Impact Assessment by Purser

Appendix B – CGI by 3D Design Bureau

Appendix C – NISA – Acoustic Review and Planning Stage Report by Amplitude Acoustics

Appendix D – Drawings by JFOC Architects

Appendix A – Landscape & Visual Impact Assessment by Purser

PURSER

Landscape & Visual Impact Assessment
Project: Submission to North Irish Sea Array Offshore Wind Farm, Case Ref. ABP-319866-24.
Client: Lagan Homes Balbriggan Limited

LVIA

16.10.26

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Document Control

Document	Landscape & Visual Impact Assessment
Project	North Irish Sea Array Offshore Wind Farm, Case Ref. ABP-319866-24
Client	Lagan Homes Balbriggan Limited
Project Reference:	P-2026-35-179

Document Issue and Check				
Issue	**Date**	**Status**	**Issued to:**	**Checked by:**
P_01_R1	04.09.2026	Draft	Client	SD
P_01_R2	16.10.2026	Final	Client	SD

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Appendix A: Assessment Methodology

LVIA Demonstrates Bremore Substation Cannot Be Permitted as Proposed

The proposed siting of the c.17 m Bremore Substation immediately adjoining the Lands at Flemington Lane gives rise to **Very Significant** and **Negative** landscape effects and **Profound / Very Significant** and **Negative** visual effects.

These effects arise from the location, scale, massing and proximity of the infrastructure and cannot be remedied by screening or changes in materiality.

To safeguard the delivery of the new residential neighbourhood provided for by the adopted Flemington LAP, the Bremore Substation should be omitted from its present location or materially resited and set back within the NISA lands.

If the Commission is otherwise minded to grant permission, it should require the necessary design changes to secure an appropriate physical, landscape and visual separation from the Lands at Flemington Lane.



First-Floor Residential View – High-Sensitivity Receptor Experiencing a Profound–Very Significant Negative Visual Effect as a result of the proposed Bremore Substation

1.0 Introduction

1.1 Landscape and Visual Impact Assessment

Purser has been instructed by Lagan Homes Balbriggan Limited to prepare this Landscape and Visual Impact Assessment (LVIA) in support of a submission to An Coimisiún Pleanála in respect of the further information submitted by North Irish Sea Array Windfarm Limited (the "NISA Applicant") in relation to the proposed North Irish Sea Array Offshore Wind Farm, Case Ref. ABP-319866-24.

The NISA application was submitted in June 2024. On 10 April 2025, An Bord Pleanála, now An Coimisiún Pleanáta, issued a Request for Further Information which, among other matters, required the NISA Applicant to review the Flemington Local Area Plan and update the application documentation having particular regard to the potential visual effects of the Bremore Substation on the adjoining residential lands. The NISA Applicant subsequently submitted further information including an Addendum to the EIAR, an Addendum to the Planning Report, revised planning drawings, revised landscape proposals and updated photomontages for the Grid Facility.

This LVIA is concerned specifically with the Bremore Substation, which forms part of the wider onshore Grid Facility at Bremore, and in particular its relationship with the adjoining Lands at Flemington Lane. It does not seek to reassess the Compensation Substation, the wider offshore wind farm or the NISA development as a whole.

The Lands at Flemington Lane comprise approximately 17.2 ha and correspond to the full extent of the lands governed by the Flemington Local Area Plan. Lagan Homes Balbriggan Limited is the owner of the entire landholding and is actively progressing its development as a new residential neighbourhood in accordance with the RA – Residential Area zoning and the adopted Flemington Local Area Plan. References in this Assessment to the Lands at Flemington Lane are therefore references to the full Flemington LAP lands. The planned residential use and character of these lands are established through the statutory planning framework and are not a hypothetical future scenario.

The purpose of this Assessment is to determine whether the further information submitted by the NISA Applicant adequately addresses the landscape and visual effects arising from the location of the Bremore Substation immediately adjoining the Lands at Flemington Lane, and whether the Bremore Substation can properly be accommodated in its presently proposed location.

Particular consideration is given to:

- the siting, height, scale and massing of the Bremore Substation building;
- the landscape relationship between the Bremore Substation and the planned residential settlement edge;
- the resulting landscape and visual effects on the Lands at Flemington Lane;
- the adequacy of the landscape and visual assessment and mitigation submitted in response to the Request for Further Information; and
- whether an appropriate physical, landscape and visual separation has been provided between the Bremore Substation and the planned residential neighbourhood.

The Assessment has regard to the NISA Applicant's updated landscape and visual material, including the Addendum to Chapter 29 – Seascape, Landscape and Visual, the updated Grid Facility photomontages contained in Volume 7C2, the revised Grid Facility Landscape Plan and the associated planning drawings.

The Assessment also has regard to the Fingal Development Plan 2023–2029, the Flemington Local Area Plan 2024, the residential development proposals being progressed for the Lands at Flemington Lane and the existing and planned landscape and visual character of the area.

This report is intentionally focused in scope. It does not duplicate the NISA Applicant's wider seascape, landscape and visual assessment. Rather, it provides an independent professional assessment of the specific landscape and visual issue arising at the interface between the Bremore Substation and the Lands at Flemington Lane and considers whether that relationship has been satisfactorily addressed through the further information now before An Coimisiún Pleanála.

This Landscape and Visual Impact Assessment was prepared by Seamus Donohoe, Director and Landscape Architect at Purser, with assistance from Adithi Nair.

Adithi Nair holds a Bachelor of Architecture and a Master of Regional and Urban Planning (MRUP) from University College Dublin. She is also a Registered Architect with the Council of Architecture, India.

Seamus Donohoe holds degrees in Landscape Architecture (BAgrSc Landscape Architecture, University College Dublin, 2010) and Town Planning (MRUP, University College Dublin, 2013). He is a Registered Landscape Architect and Member of the Irish Landscape Institute, a Corporate Member of the Irish Planning Institute and a Chartered Member of the Royal Town Planning Institute. He has over 16 years' professional experience in landscape architecture and Landscape and Visual Impact Assessment.

Purser has prepared this Assessment independently in accordance with established landscape and visual assessment principles. The conclusions reached represent the professional judgement of the author.

1.2 Executive Summary

Issue	Assessment
The statutory residential planning context is clearly established	The Lands at Flemington Lane are zoned RA – Residential Area and are subject to the adopted Flemington Local Area Plan, which provides a detailed statutory framework for the delivery of a new residential neighbourhood. Lagan Homes Balbriggan Limited owns the entire 17.2 ha landholding and is actively progressing its development. The future residential use and intended character of these lands are therefore firmly established.
The Bremore Substation introduces a fundamentally different scale and character at the residential interface	The principal Bremore Substation building is approximately 17 m high, with higher ancillary elements. The NISA Applicant itself describes the nearest structure as "tall and bulky". The proposed infrastructure is of a materially different height, massing and character from the predominantly low-rise residential neighbourhood planned immediately adjoining it.
The landscape effect is Very Significant and Negative	Purser assesses the planned Flemington/Bremore settlement-edge landscape as having Medium sensitivity. The introduction of the Bremore Substation immediately at that settlement edge is assessed as giving rise to a Very High magnitude of landscape change, resulting in a Very Significant and Negative landscape effect.
The visual effects on future residential receptors are substantial	CGI visualisations prepared from representative future receptor locations within the Lands at Flemington Lane demonstrate the scale and proximity of the Bremore Substation within the planned residential environment. From the closest first-floor residential receptors, the Bremore Substation would be overwhelmingly dominant and overbearing, resulting in Very High magnitudes of visual change and Profound / Very Significant and Negative visual effects. A Very Significant and Negative visual effect is also identified from proposed public open space.
The further information identifies the problem but does not satisfactorily resolve it	The NISA Applicant acknowledges substantial effects on the Lands at Flemington Lane, including a High magnitude and Major significant visual effect from the nearest portion of the LAP lands. Notwithstanding those findings, the principal siting of the Bremore Substation remains materially unchanged. The response relies principally upon architectural treatment, planting, intervening residential development and the future arrangement of open space and orientation of dwellings within the Lands at Flemington Lane.
The Bremore Substation should not be permitted in its present location	The fundamental issue is the principle of locating infrastructure of this scale and character immediately adjoining the planned residential neighbourhood. That issue cannot be satisfactorily addressed by screening. In Purser's opinion, the Bremore Substation in its present location and configuration is not consistent with the proper planning and sustainable development of the area. At a minimum, the principal built infrastructure should be resited and materially set back within the NISA lands so that an appropriate physical, landscape and visual separation is provided from the Lands at Flemington Lane.

Table 1.1 – Principal Findings and Required Response

The central finding of this LVIA is that the further information submitted by the NISA Applicant does not satisfactorily resolve the landscape and visual relationship between the Bremore Substation and the planned residential neighbourhood at the Lands at Flemington Lane.

The issue is not visibility alone. It arises fundamentally from the location, scale, massing and proximity of a substantial c.17 m-high Bremore Substation building immediately adjoining a statutory residential settlement edge. The appropriate response is therefore a siting response. The Bremore Substation should not be permitted in its present location and should, at a minimum, be resited and materially set back within the wider NISA lands to provide an appropriate physical, landscape and visual separation from the planned residential neighbourhood.

1.3 Assessment Approach and Methodology

This LVIA has been prepared having regard to established landscape and visual assessment principles and professional practice. Landscape and visual effects are assessed separately, recognising that they are related but distinct considerations. The assessment considers the sensitivity of the relevant landscape and visual receptors, the magnitude of change arising from the proposed Bremore Substation and the resulting significance and quality of effect.

The assessment is deliberately focused on the relationship between the proposed Bremore Substation and the Lands at Flemington Lane. It does not seek to reproduce the wider seascape, landscape and visual assessment undertaken for the NISA project.

Particular regard is given to the location, scale, height and massing of the Bremore Substation; the effect of the development on the character of the planned residential settlement edge; the relationship between the contrasting land uses; and the resulting landscape and visual effects on the Lands at Flemington Lane.

The landscape assessment considers the existing and planned receiving environment. The Lands at Flemington Lane presently comprise predominantly agricultural land. However, their planned future character is established by the RA zoning and adopted Flemington Local Area Plan. The assessment therefore distinguishes between the existing agricultural baseline and the planned residential settlement-edge landscape when considering landscape sensitivity and the effects of the Bremore Substation.

The visual assessment also has regard to accurately modelled CGI visualisations prepared by 3D Design Bureau from representative future receptor locations within the planned residential development at the Lands at Flemington Lane. As the proposed residential streets, open spaces and dwellings have not yet been constructed, conventional baseline photography cannot be obtained from those future receptor locations. Conventional verified photomontages cannot therefore be prepared from those positions.

Instead, the CGI visualisations model the proposed residential development together with the Bremore Substation using the relevant survey information, site levels, topography and three-dimensional development models. Their purpose is to illustrate the prospective visual relationship between the planned residential neighbourhood and the Bremore Substation from locations which will become residential and recreational receptors as the Lands at Flemington Lane are developed.

These images are therefore treated as CGI visualisations rather than conventional baseline/proposed photomontages. Their role and the assessment undertaken from the representative locations are considered further in Section 6.0.

The detailed assessment methodology, including the criteria used to determine landscape and visual sensitivity, magnitude of change, significance and quality of effects, is set out in Appendix A.

1.4 Structure of this Report

The remainder of this report is structured as follows:

- **Section 2 – NISA Grid Facility / Bremore Substation and Response to Further Information**
  Describes the proposed Bremore Substation, the relevant Request for Further Information issued by the Commission, the response submitted by the NISA Applicant and the principal landscape and visual issues arising from that response.

- **Section 3 – Lands at Flemington Lane**
  Describes the Lands at Flemington Lane, their statutory planning status, the adopted Flemington Local Area Plan, the residential development being progressed by Lagan Homes Balbriggan Limited and the planned character of the new residential neighbourhood.

- **Section 4 – Planning and Landscape Policy Context**
  Considers the relevant provisions of the Fingal Development Plan 2023–2029 and the Flemington Local Area Plan 2024, including the RA and RU zoning objectives, landscape character and sensitivity, and the policy implications for the relationship between the Bremore Substation and the planned residential settlement edge.

- **Section 5 – Landscape Effects**
  Assesses the relevant landscape receptors and receiving environment, landscape sensitivity, the magnitude of landscape change arising from the Bremore Substation and the resulting significance and quality of landscape effects.

- **Section 6 – Visual Effects**
  Assesses the effects of the Bremore Substation on future visual receptors within the Lands at Flemington Lane, having regard to the NISA Applicant's updated visual assessment and photomontages and the CGI visualisations prepared by 3D Design Bureau.

- **Section 7 – Conclusion**
  Sets out the principal findings of the Assessment, considers the adequacy of the further information submitted by the NISA Applicant and identifies the response considered necessary in relation to the present location and siting of the Bremore Substation.

- **Appendix A – Assessment Methodology**



Figure 11: Aerial Image of Lagan Homes Site and Bremore Substation. Source: Bing Maps, annotated by Purser. Site Boundaries indicative only.)

2.0 Bremore Substation and RFI Response

2.1 The Bremore Substation

The proposed North Irish Sea Array (NISA) Offshore Wind Farm was submitted to An Bord Pleanála on 7 June 2024 under Case Ref. ABP-319866-24. The overall project comprises offshore wind generation and associated offshore and onshore infrastructure. The Grid Facility at Bremore comprises two substations, including the Bremore Substation. This Assessment is concerned solely with the Bremore Substation.

The Bremore Substation is located at the northern edge of Balbriggan. Of particular relevance to this Assessment, the southern boundary of the Substation directly adjoins the Flemington Local Area Plan lands. NISA's own updated documentation identifies the Flemington LAP as comprising approximately 17.2 ha of lands immediately south and south-west of the Bremore Substation, planned for medium-density residential development.

The Grid Facility includes two principal substation buildings: the Compensation Substation Building and the Bremore Substation Building, together with associated electrical plant, compounds, access and ancillary infrastructure. NISA confirms that both principal buildings comprise ground and first-floor accommodation and are approximately 17 m in height, a dimension stated to arise from EirGrid functional requirements for the equipment contained within the buildings. Submitted elevations indicate a proposed ground level of approximately 31.80 m AOD, with the principal substation built form extending to approximately 48.80 m AOD and lightning protection elements extending to approximately 51.80 m AOD. This equates to approximately 17 m of principal building height and approximately 20 m to the highest elements above proposed ground level.

The Bremore Substation is the part of the Grid Facility located closest to the Flemington LAP lands and is consequently the principal focus of this LVIA. NISA itself refers to the boundary directly between the Bremore Substation and the Flemington lands as requiring additional landscape treatment and identifies this as the interface with the future residential development.

The relationship is therefore unusually direct. On one side of the boundary is a substantial electricity Substation containing buildings approximately 17 m in height; on the other are lands forming part of the planned expansion of Balbriggan as a new residential neighbourhood. NISA's updated landscape and visual assessment expressly recognises that the future residents of the Flemington LAP lands will constitute new visual receptors immediately south of the Bremore Substation.

The location, height and scale of the Bremore Substation relative to that adjoining residential context are the matters of principal relevance to this Assessment. The detailed planning context for the Flemington lands is set out in Section 3.0, while the landscape and visual consequences of this relationship are assessed in Sections 5.0 and 6.0 respectively.

2.2 The Commission's Request for Further Information

On 10 April 2025, An Bord Pleanála, now An Coimisiún Pleanála, issued a Request for Further Information in respect of the NISA application. By that stage, the Flemington Local Area Plan had been adopted by Fingal County Council on 9 December 2024, subsequent to the submission of the NISA application in June 2024.

Of particular relevance to this Assessment is RFI Item 13(e), which required the NISA Applicant to review the Flemington LAP and update the application documentation having particular regard to:

- the potential for visual impacts from the substation on the Flemington LAP lands;
- the relationship between the proposed Bremore Substation access and the proposed access to the LAP lands; and
- the potential for noise impacts from the substation on the adjoining residential-zoned lands.

The RFI is significant in the context of this Assessment. It expressly recognises that the adoption of the Flemington LAP altered the planning and receiving-environment context against which the Bremore Substation required consideration. The lands immediately adjoining the Bremore Substation were no longer simply agricultural lands within the wider hinterland of Balbriggan; they were subject to an adopted statutory framework for substantial residential development.

The Commission therefore specifically required the Applicant to address the relationship between the Grid Facility/ Bremore Substation and the planned residential community at Flemington, including the visual effects of the substation on those lands. In response, NISA updated its planning and environmental documentation and undertook additional assessment of visual, noise and traffic effects having regard to the adopted LAP.

For the purposes of this LVIA, the central issue arising from RFI Item 13(e) is whether the additional information now submitted adequately addresses the landscape and visual relationship between the Bremore Substation and the Flemington residential lands, or whether a material conflict remains unresolved.

2.3 NISA's Response to the Request for Further Information

In response to RFI Item 13(e), North Irish Sea Array Windfarm Limited (the "NISA Applicant") submitted updated landscape and visual information, including the Addendum to Chapter 29 – Seascape, Landscape and Visual, revised Grid Facility photomontages and an updated Landscape Mitigation Plan. The Addendum incorporates specific amendments addressing the subsequently adopted Flemington LAP and the visual effects of the Grid Facility (including the Bremore Substation) on the planned residential lands.

At page 29.27 of the Addendum to Chapter 29 – Seascape, Landscape and Visual, it is recognised that development of the Flemington LAP lands would result in the "urban residential fringe of Balbriggan" extending to the southern boundary of the Grid Facility site. At page 29.28, the Addendum identifies the 17.2 ha LAP lands as providing for up to approximately 650 homes and states that *"The new residents would become visual receptors in respect of the Grid Facility."*

The updated assessment identifies substantial visual effects at the closest interface. At page 29.29 of the Addendum, construction-phase effects from the nearest portion of the LAP lands are assessed as High magnitude and Major (significant). For the operational phase, page 29.30 of the Addendum describes the nearest substation structure as a "tall and bulky structure rising above the intervening treelined hedgerow" and states that the southern substation building could appear "imposing" from the nearest portions of the LAP lands. The effect at the immediate interface is again assessed as High magnitude and Major (significant).

The physical position and approximate 17 m height of the principal substation buildings are not materially altered through the RFI response. Instead, the response introduces a revised architectural finish and additional landscape mitigation. At page 29.30 of the Addendum, the revised Landscape Mitigation Plan is described as including woodland-thicket planting and semi-mature trees approximately 6–7 m high at planting along the boundary adjoining the Flemington lands. The revised Grid Facility photomontages in Volume 7C2 also correct an error in the earlier 2024 visualisations concerning the represented height of certain Grid Facility elements.

At page 29.31 of the Addendum, it is stated that the additional woodland and semi-mature planting would provide a "more substantial visual screen and perceptual divide" and that residual effects at the nearest portions of the LAP lands would reduce from Major to Major–Moderate, with further reductions anticipated through distance, intervening buildings and vegetation, and the maturation of planting.

The assessment also places reliance on the future development of the Flemington lands themselves. At page 29.30 of the Addendum, it is stated that intervening dwellings within the LAP lands would preclude visibility of the Grid Facility from much of the area. At page 29.31, it is further stated that future LAP layouts could be made "cognisant of the grid facility layout" through the arrangement of open space and orientation of dwellings.

Accordingly, the response to RFI Item 13(e) retains the principal Grid Facility in its proposed location and seeks principally to address the identified effects through architectural treatment, additional landscape screening and the future configuration of development within the Flemington lands. The implications of that approach are considered below.

2.4 NISA's Proposed Approach to the Flemington Lands

The updated assessment is important not only for the effects it identifies, but for the manner in which those effects are proposed to be addressed. The NISA Applicant's own evidence establishes that the planned residential edge will extend to the Grid Facility boundary; that the nearest substation building (Bremore Substation) will remain a tall, bulky and potentially imposing element; and that significant visual effects arise at the closest part of the Flemington lands. Notwithstanding those findings, the RFI response does not materially alter the siting, scale or separation of the principal Bremore Substation building.

2.4.1 The underlying spatial relationship remains unchanged

At page 29.27 of the Addendum to Chapter 29 – Seascape, Landscape and Visual, the future residential edge of Balbriggan is expressly recognised as extending to the southern boundary of the Grid Facility. At page 29.30, the nearest substation is nevertheless assessed as a "tall and bulky" structure which could appear "imposing" and give rise to a Major (significant) effect from the nearest part of the LAP lands.

The RFI response does not materially change that relationship. There is no relocation of the Bremore Substation, no material setback from the Flemington lands and no reduction in the approximately 17 m height of the principal building.

The changes instead concern its treatment and screening.

At page 29.30 of the Addendum, the revised architectural treatment is described as producing an "urban edge – commercial" rather than a "rural-industrial" appearance. That may slightly alter how the building is perceived, but not materially. It does not alter its height, massing, proximity or relationship with the adjoining residential neighbourhood.

The underlying issue therefore remains one of siting and physical relationship, rather than architectural finish alone.

2.4.2 Screening is being relied upon to address a siting and scale issue

The principal landscape response is additional planting.

At page 29.30 of the Addendum to Chapter 29 – Seascape, Landscape and Visual, woodland-thicket planting and semi-mature trees approximately 6–7 m high at planting are proposed to reinforce the existing boundary vegetation. At page 29.31, that planting is described as providing a "more substantial visual screen and perceptual divide", with further reductions in effect anticipated as the woodland and treeline increase in volume and height.

The proposed planting is relevant and may reduce visibility. It does not, however, reduce the scale of the principal building, alter its location or provide greater physical separation from the planned residential neighbourhood.

The distinction is fundamental. Screening and integration are not synonymous. A substantial building may become less visible as vegetation establishes without the underlying spatial relationship thereby becoming appropriate.

The question arising is therefore not simply whether the Bremore Substation can ultimately be screened. It is whether a c.17 m infrastructure building has been appropriately sited in the first instance immediately adjoining a planned predominantly low-rise residential neighbourhood.

2.4.3 Part of the mitigation burden is transferred to the Flemington lands

The NISA assessment does not rely solely upon mitigation within the Grid Facility / Bremore Substation site.

At page 29.30 of the Addendum to Chapter 29 – Seascape, Landscape and Visual, it is stated that:

> *"intervening vegetation and dwellings within the LAP lands will preclude visibility of the Grid Facility..."*

At page 29.31 of the same Addendum, it is further stated that:

> *"future LAP design layouts can be cognisant of the grid facility layout in terms of the arrangement of open space and orientation of dwellings"*

The effect of that approach is that part of the mitigation response is transferred to the adjoining residential lands. Future dwellings are relied upon as screening, while their orientation and the arrangement of public open space are envisaged as matters capable of being adjusted in response to the Bremore Substation.

That reverses the appropriate design logic at the interface. The Bremore Substation is the development introducing a substantial infrastructure building immediately beside the planned residential edge. The first response should therefore be to determine whether that building can be appropriately located, set back and integrated within the Grid Facility lands themselves, rather than requiring the statutory residential lands to turn away from, screen or otherwise accommodate it.

The premise upon which that approach was advanced is also now overtaken. At page 29.31 of the Addendum, it is stated that "the LAP layout is still at early design stage and a planning application has yet to be lodged." As set out in Section 3.0, a detailed residential application has since been submitted for part of the Flemington lands, with the subsequent phase also being actively progressed.

2.4.4 Material gaps remain in the landscape and visual evidence

The updated Chapter 29 assessment is principally directed towards visual effects and visual screening.

At page 29.28 of the Addendum to Chapter 29 – Seascape, Landscape and Visual, it is expressly stated that there are no changes to the assessment of Landscape Sensitivity or Construction Phase Landscape Effects, notwithstanding the recognition that the receiving environment will change from agricultural land to the urban residential edge of Balbriggan.

The Addendum therefore does not substantively address the separate landscape question of whether the siting, height, massing and infrastructural character of the Bremore Substation provide an appropriate relationship with the planned residential settlement edge, or whether an adequate physical and landscape transition has been provided between the two land uses.

2.5 Limitations of the Updated Visual Evidence

The NISA Applicant has submitted revised Grid Facility photomontages in Volume 7C2 – 2026 LVIA Photomontages NISA Grid Facility. These provide useful visual evidence from a series of surrounding roads and publicly accessible locations and are relevant to the assessment of the wider visibility of the Grid Facility / Bremore Substation.

The use of public viewpoints is not, in itself, a deficiency. Such viewpoints are conventional and appropriate for assessing effects experienced from the public realm. The issue in this case is different.

The Commission expressly required the NISA Applicant to consider the potential visual impacts of the substation on the Flemington LAP lands. The updated Addendum to Chapter 29 – Seascape, Landscape and Visual subsequently recognises that development of those lands would introduce up to approximately 650 homes and expressly states that "The new residents would become visual receptors in respect of the Grid Facility."

Notwithstanding that recognition, no updated photomontage has been provided from within the Flemington LAP lands themselves.

This is material because the closest future residential receptors are also those for which the NISA Applicant identifies the greatest effects. At page 29.30 of the Addendum to Chapter 29 – Seascape, Landscape and Visual, the southern substation building is described as potentially "imposing" from the nearest portions of the LAP lands, with a High magnitude and Major (significant) visual effect identified at that interface.

The updated photomontages therefore demonstrate the Grid Facility, including the Bremore Substation, from the surrounding public realm, but do not visually demonstrate the relationship that is central to RFI Item 13(e): how a c.17 m Bremore Substation building will actually be experienced from within the planned residential neighbourhood immediately adjoining it.

In Purser's opinion, this constitutes a material gap in the visual evidence before the Commission.

The visual material presented in Section 6.0 of this Assessment is intended to address that gap by illustrating the relationship from within the planned streets, open spaces and residential environment of the Flemington lands.

2.6 Adequacy of the Landscape and Visual Response to the RFI

The Commission's request was specific. RFI Item 13(e) required the NISA Applicant to review the Flemington LAP and update the application documentation having particular regard to the potential visual impacts of the substation on the Flemington LAP lands. The Addendum to Chapter 29 – Seascape, Landscape and Visual was prepared expressly in response to that requirement.

In Purser's opinion, the landscape and visual information submitted in response to the RFI **does not satisfactorily address the issue identified by the Commission.**

The updated assessment contains a series of findings which should, in themselves, have required a more fundamental examination of the relationship between the Bremore Substation and the Flemington lands. It accepts that the urban residential fringe of Balbriggan will extend to the southern boundary of the Grid Facility; that future residents will become visual receptors; that the nearest substation will be experienced as a "tall and bulky" structure; that the southern substation could appear "imposing"; and that a High magnitude / Major (significant) visual effect arises at the closest part of the LAP lands.

Those findings identify a clear conflict at the interface. However, the response does not then test whether that conflict should be avoided or materially reduced through the siting, setback, scale or massing of the Bremore Substation itself. The principal physical relationship remains unchanged. The substantive design responses comprise revised external finishes and additional planting, including woodland thicket and semi-mature trees approximately 6-7 m high at planting.

In Purser's opinion, that is an inadequate response to the nature of the effect identified. Changing the architectural treatment of a c.17 m building and increasing boundary planting may assist in moderating its appearance and visibility. It does not address the underlying question of whether a building of that scale and infrastructural character is appropriately located immediately adjoining the planned residential neighbourhood.

The approach is further weakened by the extent to which the assessment seeks to resolve the effect outside the Grid Facility site itself. At page 29.31 of the Addendum to Chapter 29 – Seascape, Landscape and Visual, it is stated that:

> *"future LAP design layouts can be cognisant of the grid facility layout in terms of the arrangement of open space and orientation of dwellings..."*

That is a particularly significant proposition. It means that the assessment does not merely rely upon mitigation undertaken by the NISA Applicant. It envisages the planned residential neighbourhood adapting itself to the Bremore Substation, through the orientation of dwellings, arrangement of open space and the screening provided by future development.

In Purser's opinion, this reverses the appropriate planning and design response. The Bremore Substation is the development introducing the substantial infrastructure building at the interface. The first task should therefore be to demonstrate that its own location, setback, scale and landscape transition have been optimised before relying upon changes to the adjoining statutory residential lands to reduce the consequences of that siting.

There is also a material weakness in the scope of the updated landscape assessment itself. Despite acknowledging that the receiving environment will change from agricultural land to the urban residential fringe of Balbriggan, the Addendum records no change to the assessment of Landscape Sensitivity and no change to the Construction Phase Landscape Effects assessment. The response is therefore heavily weighted towards visual screening, rather than a substantive reassessment of the landscape relationship created by placing major electricity infrastructure immediately beside a planned residential settlement edge.

The visual evidence is similarly incomplete. The NISA Applicant expressly recognises the future Flemington residents as visual receptors and identifies the most substantial effects as occurring within the nearest portions of those lands. Yet the revised photomontage package does not include a representative view from within the Flemington LAP lands themselves. The Commission is therefore presented with conclusions as to the visual experience of the future residential population without a visualisation demonstrating that experience from the receptor environment concerned.

In Purser's opinion, this constitutes a material gap in the visual evidence before the Commission.

The issue is not that the public-road viewpoints used by the NISA Applicant are inappropriate. They provide useful evidence of the wider public-realm visibility of the Grid Facility and Bremore Substation. The deficiency is that they do not test the particular relationship which RFI Item 13(e) required to be examined: the experience of the Bremore Substation from the adjoining Flemington residential lands.

It is also important that the conclusion that residual effects are not significant in EIA terms is not treated as resolving the underlying planning and landscape question. At page 29.31 of the Addendum Chapter 29, residual effects from the nearest portions of the Flemington lands are still assessed as Major to Major–Moderate, with their reduction dependent upon screening by planting, intervening buildings and vegetation over time. Whether those effects cross the Applicant's threshold of significance for EIA purposes is a separate question from whether the siting and physical relationship are acceptable in landscape and planning terms.

Taken as a whole, the RFI landscape and visual response therefore identifies the problem but does not adequately resolve it. It recognises a substantial and potentially imposing infrastructure building at the immediate edge of a planned residential community, but does not demonstrate that meaningful avoidance or reduction through relocation, increased setback or other substantive design intervention has been examined. Instead, it relies principally upon changes in finish, planting, the maturation of that planting and the future residential development itself.

In Purser's opinion, a robust response to the findings identified in the Addendum should have gone further. Having identified High magnitude and Major significant effects at the closest interface, the assessment should have tested whether those effects could first be avoided or materially reduced through the siting and configuration of the Bremore Substation, before proceeding to secondary measures such as screening.

Accordingly, Purser considers that the additional landscape and visual information submitted by the NISA Applicant does not satisfactorily discharge the landscape and visual issue raised by RFI Item 13(e). The fundamental relationship between the Bremore Substation and the Flemington residential lands remains unresolved and requires substantive consideration in Sections 5.0 and 6.0 of this Assessment.

3.0 Lands at Flemington Lane

3.1 Lands at Flemington Lane

The Lands at Flemington Lane comprise the entire approximately 17.2 ha landholding contained within the adopted Flemington Local Area Plan in north Balbriggan. Lagan Homes Balbriggan Limited is the owner of the entire 17.2 ha LAP landholding. Accordingly, references in this Assessment to the Lands at Flemington Lane refer to the full extent of the lands governed by the Flemington LAP; they are one and the same landholding.

The adopted Flemington LAP describes the lands as comprising approximately 17.2 ha of agricultural land situated north of Flemington Lane and west of the R132. Established residential areas lie immediately to the south, while rural and Greenbelt-zoned lands occur principally to the north and west. The LAP further identifies the lands as strategically located within northern Balbriggan and directly adjacent to the existing urban footprint of the town.

The northern part of the Lands at Flemington Lane directly adjoins the proposed Bremore Substation. The NISA Applicant's own Addendum to the Planning Report confirms that the lands included within the Flemington LAP are adjacent to the Grid Facility boundary along its southern extent. The Addendum to Chapter 29 – Seascape, Landscape and Visual similarly identifies the 17.2 ha residential lands as lying immediately south and south-west of Bremore Substation.

The Lands at Flemington Lane therefore occupy a strategically important position at the northern residential expansion edge of Balbriggan, between the established urban area to the south and the proposed Bremore Substation to the north. Their present agricultural character represents the existing baseline condition; their planned future use and character are established through the statutory planning framework considered in the following sections.

3.2 Statutory Planning Context

The Lands at Flemington Lane are located within the development boundary of Balbriggan and are zoned 'RA – Residential Area' under the Fingal Development Plan 2023–2029. The zoning objective is to:

> *"provide for new residential communities subject to the provision of the necessary social and physical infrastructure".*

The associated zoning vision seeks the provision of high-quality new residential environments, with appropriate layout and design, sustainable transport connections and a mix of housing capable of supporting balanced communities.

The Development Plan also specifically identified the Lands at Flemington Lane as an area for which a Local Area Plan was to be prepared. The Flemington Local Area Plan was adopted by Fingal County Council on 9 December 2024 and provides the statutory framework for the coordinated development of the entire 17.2 ha landholding.

The LAP is not merely an indicative design exercise. It is a statutory planning document prepared to establish the principles and objectives governing the future development of the lands. The LAP itself records that its purpose is to examine the area in detail and establish the framework for its future development, and that its provisions are to be taken into account in the consideration of planning applications.

The statutory planning position is therefore clear. The Lands at Flemington Lane are residentially zoned lands within the settlement boundary of Balbriggan and are subject to an adopted LAP specifically providing for their development as a new residential neighbourhood. Their present agricultural use does not define their planned future character.

This distinction is material to the assessment of the Bremore Substation. The relevant receiving environment is not simply an agricultural field adjoining rural infrastructure. It is a statutorily planned residential extension of Balbriggan, the detailed framework for which had been adopted before the Commission issued RFI Item 13(e).

3.3 Flemington Local Area Plan

The Flemington Local Area Plan establishes the detailed framework for the development of the Lands at Flemington Lane as a new residential neighbourhood within Balbriggan. Its principal aim is the coordinated and sustainable development of the lands, rather than their development as a series of unrelated or piecemeal sites.

At page 13 of the Flemington Local Area Plan, Fingal County Council sets out the following vision for the lands:

> *"The shared vision for Flemington is to promote the sustainable development of the LAP lands **at a level that is appropriate for the existing local context** through the delivery of a **new residential neighbourhood** that will offer a variety of new homes and a **quality place to live**."*
>
> [Our emphasis.]

The same vision expressly provides that the neighbourhood is to be supported by community facilities, high-quality public open space and active travel measures, with the objective of meeting the needs of the future population and generating a strong sense of community.

The development strategy divides the Lands at Flemington Lane into four Character Areas. These are intended collectively to provide a variety of residential typologies, public open spaces, active travel routes, community uses and Active Travel Hubs. The LAP explains that this approach is intended to provide variety in built form and scale, enable uses to be located appropriately, create a diversity of open spaces and ensure that all parts of the neighbourhood are accessible by active travel infrastructure.

The LAP is also explicit that the indicative layouts are not intended to prescribe the precise form of every future planning application. They instead establish a strategic framework against which development proposals are to be designed, with

individual applications required to comply with the strategic and specific objectives of the LAP and the Fingal Development Plan.

Those objectives place particular emphasis on coordinated development across the entirety of the Lands at Flemington Lane, connectivity between Character Areas, good-quality housing, public realm, open space and active travel. Objective 5.3 specifically seeks appropriate connectivity between the Character Areas "in order to prevent piecemeal development", while Objective 5.4 requires residential development to be complemented by shared open space, public realm and active travel routes.

The planned future character of the Lands at Flemington Lane is therefore clear. They are intended to function as a coherent residential neighbourhood and extension of Balbriggan, in which the quality of the streets, open spaces, built form and residential environment are integral to the successful delivery of the LAP. That planned character is directly relevant to the assessment of the relationship with the adjoining Bremore Substation.

3.4 Implementation of the Flemington Local Area Plan

The development of the Lands at Flemington Lane has now progressed beyond the strategic framework established by the Flemington Local Area Plan. Lagan Homes Balbriggan Limited is actively implementing the LAP through detailed residential proposals for the landholding.

The first planning application (Reg. Ref. LRD0107/S3E), submitted on 5 October 2026, relates to Character Area 4, at the western end of the Lands at Flemington Lane, and comprises a gross site area of approximately 4.4 ha. The Architectural and Urban Design Statement accompanying that application confirms that Lagan Homes Balbriggan Limited owns the entire 17.2 ha LAP landholding and that the Character Area 4 application forms part of the delivery of the wider LAP vision.

The Character Area 4 proposal provides for 146 residential units, at a stated density of approximately 41.1 units per hectare, together with approximately 0.53 ha of public open space, an active travel route, approximately 470 sq m of community floorspace, a crèche and Active Travel Hub, a section of the proposed link street, a multi-use games area and SuDS infrastructure.

Implementation is not confined to Character Area 4. Character Areas 1, 2 and 3 are being progressed through a separate and coordinated LRD process under Ref. LRD0090, with an LRD meeting completed in respect of a proposal for 440 dwellings and a local centre.

The significance of this position in the context of the Bremore Substation is clear. The residential development of the Lands at Flemington Lane is not a hypothetical or remote future scenario. The statutory framework has been adopted, the entire landholding is under the control of a single residential developer, a detailed proposal for Character Area 4 has been brought forward, and the remaining Character Areas are also being actively progressed as part of the coordinated implementation of the LAP.

This is materially different from the premise relied upon at page 29.31 of the Addendum to Chapter 29 – Seascape, Landscape and Visual, where it was stated that *"the LAP layout is still at early design stage and a planning application has yet to be lodged"*, and on that basis suggested that future layouts could be made cognisant of the Bremore Substation through the arrangement of open space and orientation of dwellings.

The Commission therefore now has considerably more detailed evidence of the residential environment that will adjoin the Bremore Substation than was assumed in the NISA RFI response. The relationship between the two developments must be considered against that actual and emerging residential context, rather than on the assumption that the Lands at Flemington Lane remain an undefined future development area capable of being reorganised around the Bremore Substation.

3.5 Proposed Residential Character

The planned character of the Lands at Flemington Lane is that of a coherent, human-scale residential neighbourhood, structured around streets, public open spaces, active travel routes and community facilities. The Flemington LAP expressly requires a variety of residential typologies, open spaces and community uses across its four Character Areas, with built form and landscape arranged to create a legible and connected neighbourhood rather than a series of isolated development parcels.

The detailed proposals for Character Area 4 demonstrate how that statutory framework is now being translated into built form. The development comprises 146 dwellings, including single-storey age-friendly homes, predominantly two-storey houses and three-storey apartment buildings, together with a childcare facility, Active Travel Hub, public open spaces, pedestrian and cycle connections and associated landscape infrastructure.

The layout is organised around a hierarchy of streets, the central Active Travel Route and a sequence of public spaces. Residential buildings are generally arranged to provide active frontage to streets and open spaces. The principal public spaces include a more formal piazza at the entrance to the development and a larger Neighbourhood Park, which is principally enclosed by two-storey housing and incorporates recreation, play, planting and sustainable drainage features.

The scale of the proposed residential development is deliberately varied but remains residential in character. The taller three-storey elements are concentrated around the principal public space and key routes, while lower-scale development is used elsewhere to respond to the existing context. The architectural and urban design approach emphasises human scale, active frontages, defined streets and public spaces, and a cohesive residential environment.

This planned residential character is directly relevant to the assessment of the Bremore Substation. The relevant receptors will not experience the Bremore Substation simply from an agricultural field or from surrounding public roads. They will experience it as residents moving through and occupying a new neighbourhood - from dwellings, residential streets, public open spaces, walking and cycling routes and other areas intended for everyday amenity.

The appropriate comparison is therefore between this planned, predominantly low-rise and human-scale residential environment and the adjoining c.17 m-high Bremore Substation building. It is that relationship in scale, proximity, character and spatial transition which requires assessment, rather than visibility of the Bremore Substation in isolation.

3.6 Wider Urban and Residential Context

The Lands at Flemington Lane form part of a wider area of planned and ongoing urban expansion at the northern edge of Balbriggan. While agricultural land remains evident in the existing landscape, the surrounding context is increasingly residential, recreational and urban in character.

Established residential development lies immediately south of Flemington Lane, including New Haven and Dún Saithne, which are characterised principally by low-rise housing, private gardens, boundary treatments, street planting and public open space. Bremore Cottages provides a further established residential area towards the R132 to the east.

Further substantial residential development is also committed in the surrounding area. In particular, the Flemington South LRD (Reg. Ref. LRD0069/S3E), located to the south of Flemington Lane, has been granted permission and will extend the residential footprint of northern Balbriggan through a substantial new neighbourhood incorporating housing, apartments, open space, community and childcare facilities and associated infrastructure. The submitted scheme was conceived as a major urban extension comprising residential development together with a new section of the C-Ring Road, community and retail floorspace, childcare facilities and extensive public open space.

The eastern context is also changing. Bremore Regional Park, including the Balbriggan Sports and Recreational Hub, Central Zone open spaces and Coastal Park, has been approved by Fingal County Council. Together with the established O'Dwyers GAA facilities and the R132 corridor, these uses contribute to an increasingly developed and recreational character in the area east of the Lands at Flemington Lane.

The wider context is therefore not one of an isolated residential proposal advancing into an otherwise static rural landscape. It is one of planned expansion and consolidation of the northern urban edge of Balbriggan, within which substantial new residential development, public open space, recreation, community infrastructure and transport connections are being delivered or planned.

This wider context reinforces the importance of the interface considered in this Assessment. The proposed Bremore Substation would not ultimately adjoin an isolated agricultural hinterland; it would sit immediately beside the planned residential expansion of Balbriggan and within an area undergoing a clear transition towards an urban, residential and recreational character.

4.0 Planning and Landscape Policy Context

4.1 Fingal Development Plan 2023–2029

The Fingal Development Plan 2023–2029 provides the overarching statutory planning framework for both the Lands at Flemington Lane and the proposed Bremore Substation. Of particular relevance to this Assessment are the Development Plan provisions relating to the quality of new residential development, landscape character, settlement pattern and visual amenity.

The Development Plan seeks to ensure that new residential development is of a high quality, that the highest standards of public realm and urban design are applied, and that new neighbourhoods are well-serviced, well-connected and sustainable. These objectives are directly relevant to the planned development of the Lands at Flemington Lane as a new residential extension of Balbriggan.

The Development Plan also contains a series of landscape policies and objectives which are relevant to the assessment of the Bremore Substation. Policy GINHP25 requires the preservation of the uniqueness of each Landscape Character Type having regard to its character, value and sensitivity. Objective GINHO57 requires development to reflect and, where possible, reinforce the distinctiveness and sense of place of the relevant landscape character type, including through consideration of matters such as settlement pattern, land use, scenic quality and tranquillity.

Of further relevance, Objective GINHO59 requires that new development in highly sensitive areas does not cause unacceptable visual harm, introduce incongruous landscape elements or result in the loss of features which contribute to local distinctiveness and landscape character. The Development Plan also provides for the preparation of landscape and visual assessments where significant proposals are likely to affect landscape character, views or prospects.

These provisions establish that the acceptability of development is not determined solely by whether a particular land use is permissible in zoning terms. The location, scale, form and relationship of development to its surrounding landscape and settlement context remain material considerations.

In the present case, the relevant landscape issue is the relationship between a substantial electricity Substation and the planned northern residential edge of Balbriggan. The Development Plan therefore requires consideration not simply of whether views of the Bremore Substation can be reduced through screening, but whether its siting, scale and physical relationship with the emerging settlement edge appropriately respond to the landscape character and sense of place of this part of Balbriggan.

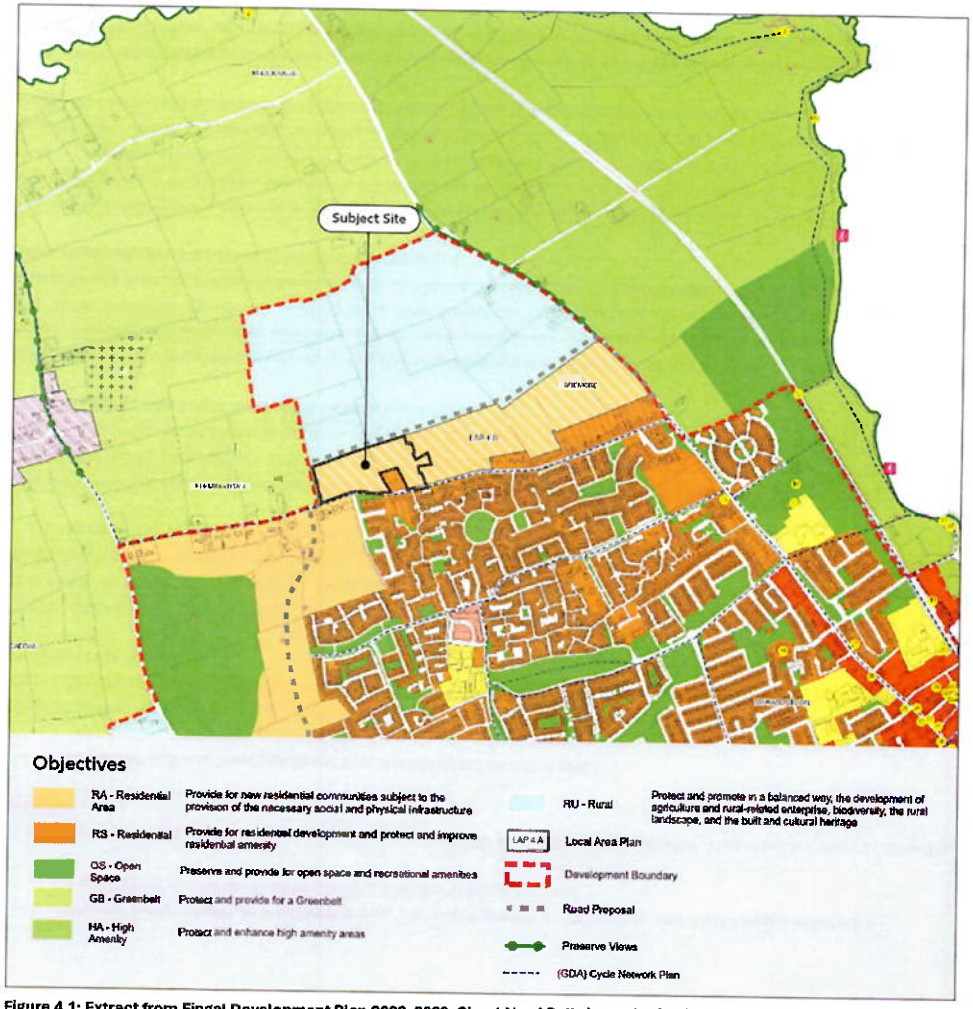


Figure 4.1: Extract from Fingal Development Plan 2023–2029, Sheet No. 4 Balbriggan. Indicative subject site boundary outlined in black by Purser

4.2 'RA' - Residential Area Zoning

The entirety of the Lands at Flemington Lane is zoned RA – Residential Area under the Fingal Development Plan 2023–2029. The stated zoning objective is to:

> *"Provide for new residential communities subject to the provision of the necessary social and physical infrastructure."*

The associated zoning vision is to:

> *"Ensure the provision of high quality new residential environments with good layout and design, with adequate public transport and cycle links and within walking distance of community facilities. Provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities."*

The RA zoning therefore establishes more than the acceptability of residential use in principle. It establishes a clear planning objective for the creation of high-quality new residential environments, in which layout, design, accessibility, community infrastructure and the overall quality of the neighbourhood are integral considerations.

That objective has subsequently been given more detailed expression through the Flemington Local Area Plan. The LAP expressly states that its vision is consistent with the RA zoning objective and seeks the delivery of a new residential neighbourhood offering a "quality place to live", supported by community facilities, high-quality public open space and active travel measures. It further requires proposals to complement the existing built and natural environments and to contribute positively to the quality of life of new and existing residents.

This policy context is directly relevant to the relationship with the Bremore Substation. The proper planning of the Lands at Flemington Lane cannot be reduced to the question of whether residential development can physically be fitted around adjoining infrastructure. The statutory objective is to create a high-quality residential neighbourhood.

Accordingly, an approach which relies upon the future arrangement of open space, the orientation of dwellings or intervening residential development to reduce the effects of the Bremore Substation must be considered against the purpose of the RA zoning itself. The layout of the Lands at Flemington Lane should principally be directed towards creating the coherent and high-quality residential environment envisaged by the Development Plan and LAP, rather than being required to compensate for the siting of substantial adjoining infrastructure.

4.3 'RU' - Rural Zoning of the Bremore Substation Lands

The proposed Bremore Substation is located on lands zoned RU – Rural under the Fingal Development Plan 2023–2029. The stated objective for RU-zoned lands is to:

> *"Protect and promote in a balanced way, the development of agriculture and rural-related enterprise, biodiversity, the rural landscape, and the built and cultural heritage."*

The associated zoning vision seeks to protect and promote the value of Fingal's rural area. That value is expressly stated to include:

> *"Visual remoteness from significant and distinctive urban influences"*

together with agricultural and rural economic resources and a high level of natural features. The Development Plan further states that building upon rural value requires, amongst other matters, protection of rural biodiversity and promotion of the integrity of the landscape.

"Utility Installations" are identified as a use Permitted in Principle within the RU zoning. The accompanying Planning Statement of Objection prepared by Stephen Ward Town Planning and Development Consultants Limited considers separately whether the Bremore Substation, having regard to its scale, form and industrial character, properly falls within the meaning of that use class and contends that it does not.

This LVIA does not seek to determine that land-use classification. From a landscape and visual perspective, however, the inclusion of Utility Installations within the RU zoning matrix cannot of itself establish the acceptability of the Bremore Substation in its proposed form or location. Any development remains subject to the RU zoning objective and vision and to the wider policies and objectives of the Development Plan.

That is particularly important in this case. The Bremore Substation includes a substantial building approximately 17 m in height, together with associated electrical infrastructure, positioned immediately at the interface between RU-zoned land and lands expressly zoned and planned for a new residential neighbourhood. Its scale, massing and infrastructural character are materially different from both the rural landscape within which it is proposed and the predominantly low-rise residential environment planned immediately adjoining it.

The NISA Applicant's own Addendum to Chapter 29 – Seascape, Landscape and Visual recognises that implementation of the Flemington LAP will extend the urban residential edge of Balbriggan to the southern boundary of the Grid Facility. The relevant landscape question is therefore not answered by the zoning matrix. It is whether the Bremore Substation has been appropriately located, scaled and designed at this sensitive interface, having regard to the rural landscape, the planned settlement edge and the residential neighbourhood established through the statutory planning framework.

Accordingly, even leaving aside the separate planning question as to whether the Bremore Substation properly falls within the "Utility Installations" use class, the RU zoning provides no basis for accepting its present siting, scale or configuration. In Purser's opinion, those matters must be assessed against the landscape objectives of the RU zoning and the wider Development Plan, and against the requirement to achieve an appropriate transition to the adjoining residential lands.

4.4 Landscape Character and Sensitive Landscapes

Section 9.6.14 of the Fingal Development Plan 2023–2029 sets out the Landscape Character Assessment for the County. It identifies six Landscape Character Types and assigns each a landscape value and sensitivity to change. The Development Plan explains that a highly sensitive landscape is likely to be more vulnerable to change than a landscape of lower sensitivity.

The Grid Facility, Bremore Substation and the Lands at Flemington Lane are situated within the wider Coastal Landscape Character Type. This character type is identified as having Exceptional landscape value and High landscape sensitivity. Balbriggan is expressly identified as one of the settlements within the Coastal Character Type.

The Development Plan attributes the exceptional value of the Coastal Character Type to the combined visual, ecological, recreational and historical qualities of the wider coastal landscape. These include beaches, islands and headlands, views towards the sea and surrounding uplands, archaeological and architectural heritage, natural heritage and areas of high ecological value.

The immediate Bremore and Flemington landscape does, however, have a more localised landscape expression. It is not equivalent in character to the immediate coastline or to the beaches, headlands and coastal prospects which contribute substantially to the exceptional value of the wider Coastal Character Type. The local landscape is characterised principally by agricultural fields, hedgerows and trees, established and emerging residential development, recreational uses and the developing northern edge of Balbriggan. This distinction is important: the county-scale Landscape Character Assessment provides the strategic context, but does not remove the need to assess the particular landscape receptor and its susceptibility to the specific form of change proposed. This same distinction was adopted in the LVIA for the first phase of development at the Lands at Flemington Lane.

The Development Plan nevertheless applies a clear policy requirement to development within this landscape. Policy GINHP25 – Preservation of Landscape Types requires decision-makers to have regard to the character, value and sensitivity of the landscape when determining planning applications. Objective GINHO57 – Development and Landscape requires development to reflect and, where possible, reinforce the distinctiveness and sense of place of the relevant Landscape Character Type, having regard to matters including scenic quality, settlement pattern, land use and tranquillity.

These matters are particularly relevant to the Bremore Substation. Its effects cannot be assessed solely by reference to the amount of built form visible from individual viewpoints. Settlement pattern, land use and the treatment of the settlement edge are themselves components of landscape character. The relationship between a substantial electricity installation and the planned northern residential expansion of Balbriggan therefore forms part of the landscape assessment in its own right.

The Development Plan also identifies Highly Sensitive Landscapes within the wider area, including a mapped sensitive landscape in the coastal area to the north-east and east of Flemington. The PA1 LVIA identified this separately from the broader Coastal Character Type and considered the visual relationship between development at Flemington and those

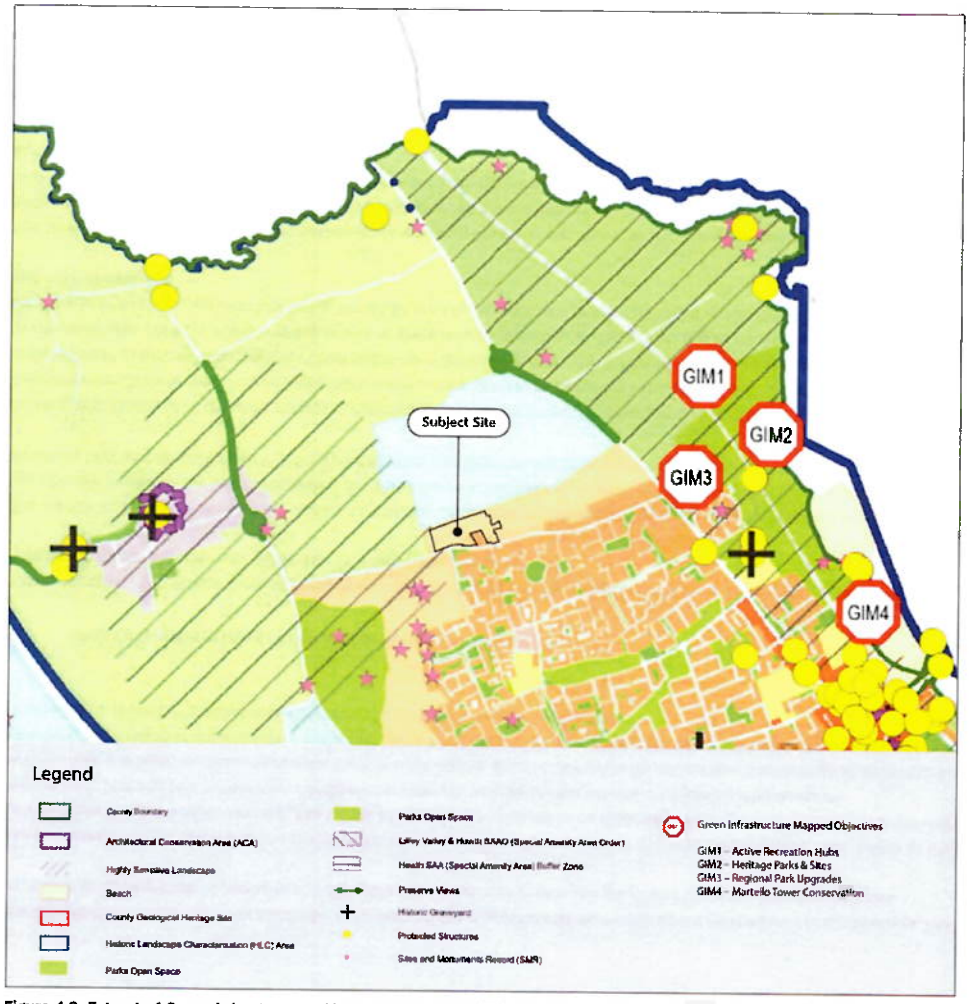


Figure 4.2: Extract of Green Infrastructure Map of the Fingal County Development Plan 2023-2029 - Sheet No.14, annotated by Purser. Site Boundary indicative only.

mapped sensitive areas. The relationship between the Bremore Substation and these sensitive coastal and recreational landscapes warrants equivalent consideration.

In that regard, Objective GINHO56 requires any necessary visual impact assessments to be prepared before approving development in highly sensitive areas, while Objective GINHO59 – Development and Sensitive Areas requires development not to impinge significantly upon the character, integrity or distinctiveness of highly sensitive areas or detract from their scenic value. Development should not cause unacceptable visual harm, introduce incongruous landscape elements, or disturb landscape features which contribute to local distinctiveness.

In Purser's opinion, these provisions require consideration of the siting, scale, massing and infrastructural character of the Bremore Substation in the round. Screening may form part of mitigation, but it does not answer the underlying landscape question of whether a c.17 m-high infrastructural building has been appropriately located and integrated at the interface between the rural/coastal landscape and the planned residential edge of Balbriggan.

4.5 Protected Views, Prospects and Sensitive Receptors

The Fingal Development Plan 2023–2029 also seeks to protect important views and prospects within the County. Policy GINHP26 – Preservation of Views and Prospects seeks to preserve views, prospects and the amenities of places and features of natural beauty or interest, while Objective GINHO60 – Protection of Views and Prospects seeks to protect views and prospects which contribute to landscape character from inappropriate development.

Two mapped Preserve Views are identified within the wider Bremore/Flemington landscape: one along the R132 to the north-east and another in the Balscadden area to the west/north-west. These form part of the wider visual context within which the Bremore Substation must be considered.

The wider area also contains important recreational and amenity receptors, including the coastal landscape, Bremore Regional Park and associated sports and recreation facilities. Given the scale and height of the Bremore Substation and its location within the wider Coastal Character Type, these receptors are relevant to the assessment of whether the proposal has been appropriately sited and whether the submitted visual evidence adequately represents its effects on the surrounding landscape and amenity environment.

4.6 Flemington Local Area Plan 2024

The Flemington Local Area Plan 2024 provides the detailed statutory framework for the development of the Lands at Flemington Lane. Its purpose is to secure the coordinated development of the lands as a new residential neighbourhood supported by community facilities, high-quality public open space and active travel infrastructure.

The LAP requires development to respond appropriately to its context and expressly states that proposals should complement both the existing built and natural environments and contribute positively to the quality of life of new and existing residents. It also places particular emphasis on the retention and reinforcement of existing landscape features, the provision of quality public open space and the creation of an interconnected green and blue infrastructure network.

These provisions are relevant to the Bremore Substation because they establish the intended character and quality of the adjoining residential neighbourhood. The Lands at Flemington Lane are to be planned around the creation of a coherent and high-quality place to live, rather than configured principally to mitigate the effects of adjoining infrastructure. Accordingly, the relationship between the Bremore Substation and the LAP lands should be resolved through an appropriate interface, separation and transition in scale and character, rather than by requiring the future residential layout, open space or dwelling orientation to compensate for the siting of the Bremore Substation

4.7 Policy Implications for the Bremore Substation

Taken together, the Fingal Development Plan 2023–2029 and the Flemington Local Area Plan establish a clear policy framework for the assessment of the Bremore Substation at this location.

The Lands at Flemington Lane are zoned for residential development and are subject to an adopted Local Area Plan specifically providing for the coordinated delivery of a new residential neighbourhood. Their intended future character, structure and function are therefore firmly established through the statutory planning framework.

As set out in Section 4.3, the accompanying Planning Statement of Objection prepared by Stephen Ward Town Planning and Development Consultants Limited separately addresses whether the Bremore Substation properly falls within the "Utility Installations" use class. Irrespective of that separate planning question, the RU zoning does not establish the acceptability of the particular siting, scale or configuration of the Bremore Substation. The RU zoning itself seeks to protect the rural landscape and landscape integrity, while the wider area forms part of a landscape identified as being of Exceptional value and High sensitivity.

The Development Plan also requires particular care at transitional zonal areas, seeking to avoid abrupt transitions in scale and use between adjoining zones and requiring regard to the character and sensitivity of adjoining lands. That consideration is directly relevant at the interface between the RU-zoned Bremore Substation lands and the RA-zoned Lands at Flemington Lane.

Against that policy context, the siting of an approximately 17 m-high infrastructural building immediately adjoining the planned residential neighbourhood is particularly problematic. The policy framework does not support an approach which leaves the Bremore Substation materially unchanged and instead requires the future residential layout, open space and orientation of dwellings to adapt around it.

The appropriate planning and landscape response is the reverse: the Bremore Substation must demonstrate an appropriate siting, scale, separation and transition at the interface with the planned residential neighbourhood. Those requirements cannot be satisfied simply through screening or by transferring the mitigation burden to the Lands at Flemington Lane.

5.0 Landscape Effects and Compatibility

5.1 Landscape Receptors and Receiving Context

For the purposes of this Assessment, two principal landscape receptors are relevant:

- the local Flemington/Bremore settlement-edge landscape, including the Lands at Flemington Lane and their interface with the Bremore Substation; and
- the wider Coastal Landscape Character Type and associated sensitive landscape context.

The existing local landscape remains predominantly agricultural, comprising fields, hedgerows and trees at the northern edge of Balbriggan. It is, however, already influenced by established residential development and the existing settlement edge. While forming part of the wider Coastal Landscape Character Type, its immediate character is more appropriately described as an agricultural settlement-edge landscape, rather than an immediate coastal landscape.

Importantly, the future character of this landscape is no longer uncertain. The Lands at Flemington Lane are zoned RA – Residential Area and are subject to the adopted Flemington Local Area Plan, which provides for their coordinated development as a new residential neighbourhood supported by community facilities, public open space and active travel infrastructure.

The NISA Applicant itself now recognises that implementation of the LAP will extend urban residential development northwards to the boundary of the Bremore Substation, while the Bremore Substation will remain within the adjoining RU-zoned lands.

The relevant receiving landscape must therefore be understood in both its existing and planned context. The existing agricultural baseline remains relevant to the assessment of landscape change, but the statutory planning framework establishes a clear future settlement edge against which the location, scale and character of the Bremore Substation must also be assessed.

Accordingly, the principal landscape receptor considered in the following sections is the Flemington/Bremore settlement-edge landscape as it transitions from its present agricultural character to the planned residential edge of Balbriggan.

5.2 Landscape Sensitivity

The Lands at Flemington Lane presently comprise predominantly agricultural land at the northern edge of Balbriggan. The landscape retains fields, hedgerows and trees, but is already influenced by adjoining residential development and the existing settlement edge. This existing landscape is assessed as falling within the Low–Medium sensitivity range, reflecting some valued landscape structure but also a clear capacity and planning expectation for change.
For the purposes of the present assessment, however, it is also necessary to consider the planned landscape condition. The Lands at Flemington Lane are zoned RA – Residential Area and are subject to the adopted Flemington Local Area Plan, which establishes a detailed framework for their development as a new residential neighbourhood, including defined character areas, streets, public open space, active travel infrastructure and landscape structure.

Against the sensitivity criteria adopted for this Assessment, the planned landscape is appropriately classified as **Medium** sensitivity. It is recognised in statutory policy and has a clearly defined future character, but it also has capacity for change. Importantly, that capacity is for appropriate and necessary change consistent with the planned residential function of the lands, rather than for development of any form or scale.

A High classification is not considered warranted because the landscape is not one where the principal objective is conservation of its existing character and the statutory framework expressly anticipates substantial change. Conversely, a Low classification would not reflect the degree to which the future character and function of the lands have now been established through the RA zoning and adopted LAP.

Accordingly, for the assessment of the operational relationship between the Bremore Substation and the Lands at Flemington Lane, Purser adopts a landscape sensitivity of **Medium.**

5.3 Magnitude of Landscape Change

The Bremore Substation would not result in the direct loss of landscape elements within the Lands at Flemington Lane. Its landscape effect arises from the introduction of substantial permanent electricity infrastructure immediately adjoining the planned northern residential edge of Balbriggan, fundamentally altering the character and relationship of that settlement edge.

The Flemington LAP establishes a new residential neighbourhood comprising predominantly low-rise residential development, streets, public open spaces, active travel routes and an integrated landscape structure. Beyond that neighbourhood, the adjoining lands remain zoned RU – Rural. In landscape terms, the intended relationship is therefore between a planned residential settlement edge and its adjoining rural landscape.

The Bremore Substation materially changes that relationship. The Bremore Substation building is approximately 17 m in height and are of a scale, massing and infrastructural character entirely different from both the planned residential neighbourhood and the adjoining rural landscape. The NISA Applicant itself describes the nearest structure as "tall and bulky" and acknowledges that it could appear "imposing" from the nearest parts of the LAP lands.

The Bremore Substation would therefore introduce a large and uncharacteristic infrastructural element at the interface between the planned residential neighbourhood and the rural landscape. Rather than the residential neighbourhood

forming a coherent new edge to Balbriggan adjoining a rural landscape, that edge would become directly influenced and defined by major electricity infrastructure.

In Purser's opinion, this represents a fundamental change in the character of the planned settlement edge. Having regard to the scale and character of the infrastructure, its immediate relationship with the Lands at Flemington Lane and the degree to which it alters the intended landscape relationship between the residential and rural lands, the magnitude of landscape change is assessed as **Very High**.

5.4 Significance of Landscape Effects

The methodology adopted for this Assessment combines the sensitivity of the landscape receptor with the magnitude of landscape change, informed by professional judgement. For a Medium sensitivity landscape subject to a Very High magnitude of change, the significance matrix indicates an effect in the range Very Significant–Significant.

As set out above, the planned Flemington/Bremore settlement-edge landscape is assessed as having Medium sensitivity, while the magnitude of landscape change arising from the Bremore Substation is assessed as Very High.

In Purser's professional judgement, the resulting landscape effect is appropriately classified as Very Significant and Negative.

That conclusion reflects the nature of the change. The Bremore Substation would introduce a large, permanent and substantially uncharacteristic infrastructural element immediately adjoining a planned residential settlement edge, materially altering the intended landscape relationship between the new neighbourhood and the adjoining rural lands. The effect is negative because the development is at variance with the scale, pattern and character intended for that interface and would diminish the coherence of the planned settlement edge. This is consistent with the methodology's definition of a negative effect as one which is at variance with landscape scale or pattern or diminishes landscape quality.

The significance arises from the change to landscape character and the settlement-edge relationship, rather than from the extent to which the Bremore Substation may or may not be visible from individual locations. Visual effects are considered separately in Section 6.0.

It is also notable that, notwithstanding the adoption of the Flemington LAP and the consequent change in the planned receiving environment, the Addendum to Chapter 29 – Seascape, Landscape and Visual records no change to the NISA Applicant's Landscape Sensitivity assessment or Construction Phase Landscape Effects assessment. In Purser's opinion, that does not adequately reflect the landscape implications of establishing a major infrastructural development immediately adjoining the now-defined residential settlement edge.

5.5 Conclusion on Landscape Effects



Figure 5.1: CGI illustrating the scale relationship between the proposed Bremore Substation and the planned residential development at the Lands at Flemington Lane.

The assessment above identifies a Very Significant and Negative landscape effect arising from the relationship between the Bremore Substation and the planned residential settlement edge at the Lands at Flemington Lane.

In Purser's opinion, an effect of that significance indicates that the Bremore Substation should not be permitted in its present location and configuration immediately adjoining the Lands at Flemington Lane. The underlying landscape effect arises from the siting, scale and character of the principal built infrastructure at this interface and should therefore be addressed through relocation, material setback or reconfiguration within the Grid Facility lands.

6.0 Assessment of Visual Effects

Viewpoint Locations and CGI Visualisations

A total of 4 No. representative locations have been selected within the planned residential development at the Lands at Flemington Lane to illustrate the prospective visual relationship between the future residential neighbourhood and the Bremore Substation. The locations are shown on the CGI location plan prepared by 3D Design Bureau.

The Lands at Flemington Lane are presently undeveloped agricultural lands. The residential streets, open spaces and dwellings from which future residents would experience the Bremore Substation have therefore not yet been constructed. It is consequently not possible to prepare conventional verified photomontages from these future receptor locations using existing baseline photography.

Instead, accurately modelled CGI visualisations have been prepared by 3D Design Bureau. The visualisations incorporate the proposed residential development at the Lands at Flemington Lane together with the NISA Bremore Substation and have been prepared using the relevant survey information, site levels, topography and digital three-dimensional models. They are intended to provide a representative illustration of the scale and relationship of the Bremore Substation as it would be experienced from within the planned residential neighbourhood.

The four locations have been selected to represent a range of future residential viewing conditions, including views from residential streets, areas adjoining dwellings and the proposed open-space and public-realm network. They include locations in the part of the neighbourhood closest to the Bremore Substation, where the relationship between the contrasting forms of development is most apparent.

These images are CGI visualisations rather than conventional photomontages and should be understood on that basis. The existing baseline at these locations remains predominantly agricultural. The purpose of the CGI exercise is to illustrate the prospective visual environment once the Lands at Flemington Lane are developed in accordance with the proposed residential scheme and the Bremore Substation is introduced immediately adjoining them.

The following sections assess the sensitivity of the future visual receptors, the magnitude of visual change and the resulting significance and quality of visual effects having regard to the CGI visualisations and the wider visual evidence submitted with the NISA application.



Figure 6.1: Viewpoint locations. (Source: 3D Design Bureau)

View 1 - First-Floor View Eastwards

6.1 First-Floor View Eastwards

Visual Receptor / Sensitivity:
Future resident at a first-floor window within the Lands at Flemington Lane. Residential receptors at home are of High sensitivity.

Assessment of CGI:
The CGI illustrates a direct and extremely close-range view towards the proposed Bremore Substation from a first-floor gable window of a dwelling located immediately adjacent to the site boundary. The Bremore Substation building is positioned so close to the window and is of such scale that it becomes the overwhelmingly dominant element in the view. Its massing occupies a very substantial proportion of the outlook and materially curtails the viewer's ability to perceive open sky above, creating an outlook that is heavily enclosed by built form. The effect is not simply that the Bremore Substation is visible or prominent; rather, it overbears the outlook from this dwelling, fundamentally altering its visual amenity and replacing what would otherwise be an open edge-of-settlement aspect with a view dominated by large-scale electrical infrastructure.

Magnitude of Visual Change:

Very High

Significance and Quality of Visual Effect:

Profound / Very Significant and Negative



View 2 – First-Floor View North-Eastwards

6.2 Viewpoint 2 – First-Floor View North-Eastwards

Visual Receptor / Sensitivity:
Future resident at a first-floor window within the Lands at Flemington Lane. Residential receptors at home are of High sensitivity.

Assessment of CGI:
The CGI illustrates a direct, close-range view north-eastwards towards the proposed Bremore Substation from a first-floor residential window. The Bremore Substation building occupies a very substantial proportion of the view and is the overwhelmingly dominant built element in the composition. Its approximately 17 m height and extensive, largely unbroken massing are markedly out of scale with the adjoining two-storey residential development. The building substantially restricts the outward aspect from the dwelling and creates a highly enclosed and overbearing outlook, with the residential environment visually subordinated to the adjoining electricity infrastructure. The effect is particularly pronounced because the Bremore Substation is experienced at close range and rises substantially above the surrounding residential built form. It would fundamentally alter the character and visual amenity of the outlook from this dwelling.

Magnitude of Visual Change:

Very High

Significance and Quality of Visual Effect:

Profound / Very Significant and Negative



View 3 – Rear First-Floor Residential View

6.3 Viewpoint 3 – Rear First-Floor Residential View

Visual Receptor / Sensitivity:
Future resident at a rear first-floor window of a dwelling adjoining the northern boundary of the Lands at Flemington Lane. Residential receptors at home are of High sensitivity.

Assessment of CGI:
The CGI illustrates a close-range view from a rear first-floor window towards the proposed Bremore Substation. The principal Bremore Substation building forms the dominant element in the outlook, rising substantially above the surrounding residential development and occupying a large proportion of the view. Its approximately 17 m height, extensive massing and proximity are starkly out of scale with the adjoining dwellings and fundamentally alter the character of the residential outlook. Rather than forming part of a coherent residential edge, the dwelling would be experienced in the immediate setting of a major electricity infrastructure building which overbears and visually dominates the rear outlook.

Magnitude of Visual Change:

Very High

Significance and Quality of Visual Effect:

Profound / Very Significant and Negative



View 4 – View from Proposed Public Open Space

6.4 Viewpoint 4 – View from Proposed Public Open Space

Visual Receptor / Sensitivity:
Future residents and users of the proposed public open space within the Lands at Flemington Lane. As receptors using an area specifically intended for residential amenity and recreation, they are considered to be of High sensitivity.

Assessment of CGI:
The CGI illustrates the proposed Bremore Substation rising substantially above the two-storey residential development enclosing the public open space. Although intervening dwellings and planting obscure the lower parts of the facility, its upper built form remains a large, conspicuous and uncharacteristic element in the centre of the outlook. Its scale is clearly appreciable by direct comparison with the adjoining houses, above which it rises by a substantial margin. The Bremore Substation consequently becomes co-dominant with the residential built form and materially changes the character of the view from one associated with a low-rise residential neighbourhood and landscaped open space to one strongly influenced by major electricity infrastructure. The intervening residential development does not remove the visual effect; rather, the CGI demonstrates that the substantial height and massing of the Bremore Substation remain evident above it.

Magnitude of Visual Change:

High

Significance and Quality of Visual Effect:

Very Significant and Negative



7.0 Conclusion

7.1 Principal Findings

The Lands at Flemington Lane are zoned RA – Residential Area and are subject to the adopted Flemington Local Area Plan, which provides a detailed statutory framework for the delivery of a new residential neighbourhood at the northern edge of Balbriggan. The future land use and intended character of these lands are therefore clearly established.

The proposed Bremore Substation would introduce substantial electricity infrastructure, including a building of approximately 17 m in height, immediately adjoining that planned residential neighbourhood. Infrastructure of this scale and character is not acceptable in this particular location or at this interface (refer also to the accompanying Planning Statement of Objection prepared by Stephen Ward Town Planning and Development Consultants Limited).

The landscape assessment undertaken by Purser identifies the planned Flemington/Bremore settlement-edge landscape as having Medium sensitivity and the Bremore Substation as giving rise to a Very High magnitude of landscape change. The resulting landscape effect is assessed as Very Significant and Negative. This arises from the fundamental alteration of the intended relationship between the planned residential neighbourhood and the adjoining rural landscape through the introduction of large-scale electricity infrastructure immediately at that edge.

The CGI visualisations further demonstrate the consequences for future residential receptors. From the closest dwellings, the Bremore Substation would be experienced at very close range as an overwhelmingly dominant and overbearing element in the outlook. Very High magnitudes of visual change and Profound / Very Significant and Negative visual effects are identified from the closest first-floor residential receptors. A Very Significant and Negative effect is also identified from the proposed public open space.

7.2 Adequacy of the Further Information

The Commission expressly required the NISA Applicant to review the adopted Flemington LAP and update the application having particular regard to the potential visual effects of the substation on the adjoining residential lands.

The response to that request identifies substantial effects. The NISA Applicant acknowledges that future residential development will extend towards the Grid Facility; describes the nearest structure as "tall and bulky"; accepts that the southern substation building could appear "imposing" from the nearest portions of the LAP lands; and identifies a High magnitude and Major significant visual effect in the immediate vicinity. Construction-stage effects from the nearest portion of the LAP lands are likewise assessed as Major and significant.

Notwithstanding those findings, the underlying relationship between the two developments remains materially unchanged. The Addendum to Chapter 29 – Seascape, Landscape and Visual expressly records no change to the Landscape Sensitivity assessment and no change to the Construction Phase Landscape Effects assessment following adoption of the LAP. The principal response is instead additional planting, revised architectural treatment and reliance upon intervening residential development. The Addendum ultimately suggests that future development within the LAP lands can itself respond to the Grid Facility / Bremore Substation through the arrangement of open space and orientation of dwellings.

In Purser's opinion, that does not adequately address the issue identified by the Commission. The effect arises fundamentally from the location, scale and character of the Bremore Substation immediately beside the planned residential neighbourhood. It cannot be resolved simply by reducing visibility over time or by requiring the Lands at Flemington Lane to adapt their own layout to accommodate the infrastructure.

The updated visual evidence is also incomplete in this respect. Although the NISA Applicant recognises the future residents of the Lands at Flemington Lane as visual receptors, the submitted Grid Facility photomontages do not provide a representative assessment from within the planned residential neighbourhood itself. The CGI assessment undertaken for this report demonstrates why that omission is material: the scale and proximity of the Bremore Substation are substantially more apparent when assessed from the future residential receptor environment.

7.3 Overall Conclusion and Required Design Response

The central issue identified in this Assessment is not one which can be resolved through architectural treatment, planting or screening. It arises from the principle of locating a Substation of this scale and character immediately adjoining the Lands at Flemington Lane, which are expressly zoned for residential development and subject to an adopted Local Area Plan for a new residential neighbourhood.

Purser's assessment identifies a Very Significant and Negative landscape effect, together with Profound / Very Significant and Negative visual effects for the closest future residential receptors. These effects arise fundamentally from the location, scale, massing and proximity of the Bremore Substation building and the resulting relationship between major electricity infrastructure and the planned residential edge of Balbriggan.

The mitigation advanced by the NISA Applicant does not alter that underlying relationship. Planting may screen part of the development and architectural treatment may alter its appearance, but neither measure changes the approximately 17 m height of the Bremore Substation building, its massing, proximity to the Lands at Flemington Lane or the absence of an appropriate transition between the two land uses. The issue is therefore one of siting and landscape compatibility, rather than simply visibility.

In Purser's professional opinion, the proposed Bremore Substation in its present location and configuration is not consistent with the proper planning and sustainable development of the area and should not be permitted.

If the Commission is otherwise minded to grant permission for the wider NISA development, the Bremore Substation should not be permitted in its presently proposed location. At a minimum, the principal built elements should be re-sited and materially set back within the NISA lands so as to establish an appropriate physical, landscape and visual separation from

the Lands at Flemington Lane. Any revised siting should be demonstrated through an updated landscape and visual assessment having regard to the adopted Flemington LAP and the future residential receptor environment.

Where such a material change cannot appropriately be secured through condition, the present Bremore Substation proposal should be omitted or refused pending the submission and assessment of an appropriately re-sited alternative.

Signed:

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Registered Landscape Architect 2025-26

Appendix A: Assessment Methodology

A1.0 General Approach

This chapter sets out the methodology developed by Purser to assess the likely effects of new development on the townscape, landscape, and visual amenity. It draws upon best practice guidance set out in the:

- Guidelines for Landscape and Visual Impact Assessment, 3rd edition, 2013 (GLVIA), published by the Landscape Institute;
- Technical Information Note on Landscape Character Assessment, 2016, published by the Landscape Institute;
- Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, 2022, published by the EPA;
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, 2018, published by the Department of Housing, Planning and Local Government.

The assessment methodology takes into account EU Directives in relation to Environmental Impact Assessment (EIA), Planning Legislation (including the Planning and Development Act 2000 (as amended), the Planning and Development Regulations 2001 (as amended)), and national, regional and local planning policy and guidance, in particular that relating to townscape, landscape, urban design, views, built heritage and supplementary guidance related to specific sites.

The area surrounding the subject site was visited in June and July 2026 to assess the potential visibility of the proposed development and its potential effects on the landscape character of the surrounding area.

The EPA guidelines 2022 provide a general methodology and impact ratings for all types of specialist assessments. The GLVIA provides specific guidelines for landscape and visual impact assessments. Therefore, a combination of the EPA guidelines, the Landscape Institute guidelines and professional experience has informed the methodology for this assessment.

The European Landscape Convention defines landscape as *"an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors"*. This expands beyond the idea that landscape is only a matter of aesthetics and visual amenity. It recognises landscape as a resource, providing a complex range of cultural, environmental and economic benefits to individuals and society.

A2.0 Key Principles of the GLVIA

Use of the Term 'Effect' vs 'Impact'
The GLVIA requires that the terms 'impact' and 'effect' be clearly distinguished and consistently used. 'Impact' is defined as the action being taken, e.g. the introduction of buildings, infrastructure or landscaping to the landscape. 'Effect' is defined as the change resulting from those actions, e.g. change in landscape character or in the amenity value of a view.

Assessment of Both 'Landscape' and 'Visual' Effects
The GLVIA requires that effects on views/visual amenity be assessed separately from the effects on landscape, although the two topics are inherently linked.

- 'Landscape' results from the interplay between the physical, natural and cultural components of our surroundings. Different combinations and spatial distribution of these elements create variations in landscape character. Landscape impact assessment identifies the changes to these elements and characteristics which would result from a proposed development and assesses the significance of those changes on the landscape as a resource.
- Visual impact assessment is concerned with changes that arise in the composition of available views, the response of people to these changes and the overall effects on the area's visual amenity.

A3.0 Methodology for Assessment of Landscape Effects

The assessment of potential landscape effects involves:

(a) classifying the sensitivity of the landscape receptors (the main elements, features, characteristics and character areas of the landscape);

(b) classifying the potential magnitude of change to each receptor, and

(c) combining these factors to arrive at an assessment of the significance of the effects on each receptor - and the quality of the effects (positive, neutral or negative).

A3.1 Landscape Sensitivity

The sensitivity of the landscape is a function of its character, which may be determined by its land use pattern, urban grain, building typologies and architecture, cultural and natural heritage elements, and the quality of the public realm. These factors determine the value that is placed on the landscape. The nature and scale of the proposed development is also taken into account (a particular landscape can have varying sensitivity to different development types), as are any trends of change, and relevant policy. Five categories are used to classify sensitivity. Please refer to **Table 1.**

Sensitivity	Definition
Very High	Areas where the landscape exhibits very strong, positive character with valued elements, features and characteristics that combine to give an experience of unity, richness and harmony. The landscape character is such that its capacity to accommodate change is very low. These attributes are recognised in policy or designations as being of national or international value and the principal management objective for the area is protection of the existing character from change.
High	Areas where the landscape exhibits strong, positive character with valued elements, features and characteristics. The landscape character is such that it has limited/low capacity to accommodate change. These attributes are recognised in policy or designations as being of national, regional or county value and the principal management objective for the area is the conservation of existing character.
Medium	Areas where the landscape has certain valued elements, features or characteristics but where the character is mixed or not particularly strong, or has evidence of alteration, degradation or erosion of elements and characteristics. The landscape character is such that there is some capacity for change. These areas may be recognised in policy at local or county level and the principal management objective may be to consolidate landscape character or facilitate appropriate, necessary change.
Low	Areas where the landscape has few valued elements, features or characteristics and the character is weak. The character is such that it has capacity for change; where development would make no significant change or would make a positive change. Such landscapes are generally unrecognised in policy and the principal management objective may be to facilitate change through development, repair, restoration or enhancement.
Negligible	Areas where the landscape exhibits negative character, with no valued elements, features or characteristics. The character is such that its capacity to accommodate change is high; where development would make no significant change or would make a positive change. Such landscapes include derelict industrial lands, as well as sites or areas that are designated for a particular type of development. The principal management objective for the area is to facilitate change in the landscape through development, repair or restoration.

Table 1: Categories of Landscape Sensitivity.

A3.2 Magnitude of Landscape Change

Magnitude of change is a factor of the scale, extent and degree of change imposed on the landscape by a development, with reference to its key elements, features and characteristics, and any affected surrounding character areas (also known as 'landscape receptors'). Five categories are used to classify magnitude of change. The categories and criteria used are given in **Table 2** below.

Definition	Magnitude
Change that is large in extent, resulting in the loss of or major alteration to key elements, features or characteristics of the landscape, and/or introduction of large elements considered totally uncharacteristic in the context. Such development results in fundamental change in the character of the landscape.	**Very high**
Change that is moderate to large in extent, resulting in major alteration to key elements, features or characteristics of the landscape, and/or introduction of large elements considered uncharacteristic in the context. Such development results in change to the character of the landscape.	**High**
Change that is moderate in extent, resulting in partial loss or alteration to key elements, features or characteristics of the landscape, and/or introduction of elements that may be prominent but not necessarily substantially uncharacteristic in the context. Such development results in change to the character of the landscape.	**Medium**
Change that is moderate or limited in scale, resulting in minor alteration to key elements, features or characteristics of the landscape, and/or introduction of elements that are not uncharacteristic in the context. Such development results in minor change to the character of the landscape.	**Low**
Change that is limited in scale, resulting in no alteration to key elements features or characteristics of the landscape, and/or introduction of elements that are characteristic of the context. Such development results in no change to the landscape character.	**Negligible**

Table 2 – Categories of Landscape Change.

A3.3 Significance of Landscape Effects

To classify the significance of effects the magnitude of change is measured against the sensitivity of the landscape using the guide in Table 2.3 below. Please refer to Section 2.6 below in relation to significance of effects for both landscape and visual impact assessment.

A3.4 Methodology for Assessment of Visual Effects

Assessment of visual effects involves identifying a number of key/representative viewpoints in the site's receiving environment, and for each one of these: (a) classifying the viewpoint sensitivity, (b) classifying the magnitude of change which would result in the view (informed by photomontages of the proposed development), and (c) combining these factors to arrive at a classification of significance of the effects on the view.

A3.4.1 Sensitivity of the Viewpoint/Visual Receptor

Viewpoint sensitivity is a function of two main considerations:

- **Susceptibility of the visual receptor to change**. This depends on the occupation or activity of the people experiencing the view, and the extent to which their attention is focused on the views or visual amenity they experience at that location. Visual receptors most susceptible to change include residents at home, people engaged in outdoor recreation focused on the landscape (e.g. trail users), and visitors to heritage attractions and places of congregation where the setting contributes to the experience. Visual receptors less sensitive to change include travellers on road, rail and other transport routes (unless on recognised scenic routes), people engaged in outdoor recreation where the surrounding landscape does not influence the experience, and people in their place of work or shopping.

- **Value attached to the view.** This depends to a large extent on the subjective opinion of the visual receptor but also on factors such as policy and designations (e.g. scenic routes, protected views), or the view or setting being associated with a heritage asset, visitor attraction or having some other cultural status (e.g. by appearing in arts).

Five categories are used to classify a viewpoint's sensitivity. Please refer to **Table 3.**

Sensitivity	Definition
Very High	Iconic viewpoints (views towards or from a landscape feature or area) that are recognised in policy or otherwise designated as being of national value. The composition, character and quality of the view are such that its capacity for change is very low. The principal management objective for the view is its protection from change.
High	Viewpoints that are recognised in policy or otherwise designated as being of value, or viewpoints that are highly valued by people that experience them regularly (e.g. views from houses or outdoor recreation amenities focused on the landscape). The composition, character and quality of the view may be such that its capacity to accommodate change may or may not be low. The principal management objective for the view is its protection from change that reduces visual amenity.
Medium	Views that may not have features or characteristics that are of particular value, but have no major detracting elements, and which thus provide some visual amenity. These views may have capacity for appropriate change and the principal management objective is to facilitate change to the composition that does not detract from visual amenity, or which enhances it.
Low	Areas where the landscape has few valued elements, features or characteristics and the character is weak. The character is such that it has capacity for change; where development would make no significant change or would make a positive change. Such landscapes are generally unrecognised in policy and the principal management objective may be to facilitate change through development, repair, restoration or enhancement.
Negligible	Areas where the landscape exhibits negative character, with no valued elements, features or characteristics. The character is such that its capacity to accommodate change is high; where development would make no significant change or would make a positive change. Such landscapes include derelict industrial lands, as well as sites or areas that are designated for a particular type of development. The principal management objective for the area is to facilitate change in the landscape through development, repair or restoration.

Table 3: Categories of Viewpoint Sensitivity

A3.5 Magnitude of Change to the View

Classification of the magnitude of change takes into account the size or scale of the intrusion of development into the view (relative to the other elements and features in the composition, i.e. its relative visual dominance), the degree to which it contrasts or integrates with the other elements and the general character of the view, and the way in which the change will be experienced (e.g. in full view, partial or peripheral view, or in glimpses). It also takes into account the geographical extent of the change, as well as the duration and reversibility of the visual effects. Five categories are used to classify magnitude of visual change to a view (Table 4):

Definition	Magnitude
Full or extensive intrusion of the development in the view, or partial intrusion that obstructs valued features or characteristics, or introduction of elements that are completely out of character in the context, to the extent that the development becomes dominant in the composition and defines the character of the view and the visual amenity	**Very high**
Extensive intrusion of the development in the view, or partial intrusion that obstructs valued features, or introduction of elements that may be considered uncharacteristic in the context, to the extent that the development becomes co-dominant with other elements in the composition and affects the character of the view and the visual amenity	**High**
Partial intrusion of the development in the view, or introduction of elements that may be prominent but not necessarily uncharacteristic in the context, resulting in change to the composition but not necessarily the character of the view or the visual amenity.	**Medium**
Minor intrusion of the development into the view, or introduction of elements that are not uncharacteristic in the context, resulting in minor alteration to the composition and character of the view but no change to visual amenity.	**Low**
Barely discernible intrusion of the development into the view, or introduction of elements that are characteristic in the context, resulting in slight change to the composition of the view and no change in visual amenity.	**Negligible**

Table 4: – Categories of Magnitude of Visual Change.

A3.6 Cumulative Impacts

The methodology for assessment of cumulative impacts has been derived from *Guidelines for Landscape and Visual Impact Assessment, Third Edition* (The Landscape Institute and Institute of Environmental Management & Assessment, 2013) (GLVIA3).

The purpose of the Cumulative Landscape and Visual Impact Assessment (CLVIA) is to consider the landscape and visual impacts of the proposed development when viewed in context with other similar development.

Cumulative effects consist of direct effects on the physical character of the site containing the development, and indirect, perceived effects on the character of areas from which the developments would be visible. GLVIA3 identifies:

Cumulative effects as 'the additional changes caused by a proposed development in conjunction with other similar developments or as the combined effect of a set of developments, taken together' (SNH, 2012:4);

Cumulative landscape effects as effects that 'can impact on either the physical fabric or character of the landscape, or any special value attached to it' (SNH, 2012:10);

Cumulative visual effects as effects that can be caused by combined visibility, which 'occurs when the observer is able to see two or more developments from one viewpoint' and/or sequential effects which 'occur when the observer has to move to another viewpoint to see different developments' (SNH, 2012:11).

The significance of any identified cumulative landscape and visual effect has been assessed as per the main LVIA methodology. These categories have been based on the same combination of receptor sensitivity and predicted magnitude of impact in order to identify the residual significance of effects.

A3.7 Significance of Landscape and Visual Effects

As with landscape effects, to classify the significance of visual effects, the magnitude of change to the view is measured against the sensitivity of the viewpoint, using the guidance in **Table 5** and **Figure 1** below. This matrix is only a guide. The assessor also uses professional judgement informed by their expertise, experience and common sense to arrive at a classification of significance that is reasonable and justifiable.

Magnitude of Landscape / Visual Change	Sensitivity of Landscape / View				
	Very High	**High**	**Medium**	**Low**	**Negligible**
Very high	Profound	Profound - Very Significant	Very Significant - Significant	Moderate	Slight
High	Profound - very significant	Very Significant	Significant	Moderate -Slight	Slight - Not significant
Medium	Very Significant - Significant	Significant	Moderate	Slight	Not significant
Low	Moderate	Moderate - Slight	Slight	Not significant	Imperceptible
Negligible	Slight	Slight - Not Significant	Not significant	Imperceptible	Imperceptible

Table 5: – Guide to Classification of Significance of Landscape and Visual Effects.

The matrix (Table 2.1) and the EPA chart (Figure 2.1) are only a guide to the classification of impact significance. The assessor also uses professional judgement informed by their expertise, experience and common sense to arrive at a classification that is reasonable and justifiable. In the EPA guidelines the chart above is accompanied by a footnote that states: "The depiction of significance classifications is indicative and should not be relied on as being definitive. It is provided for general guidance purposes" (EPA guidelines Section 3, page 53). For example, according to the EPA chart a change of high magnitude affecting a receptor of medium sensitivity could be classified as either 'significant' or 'moderate'. That judgement must be made by the assessor.

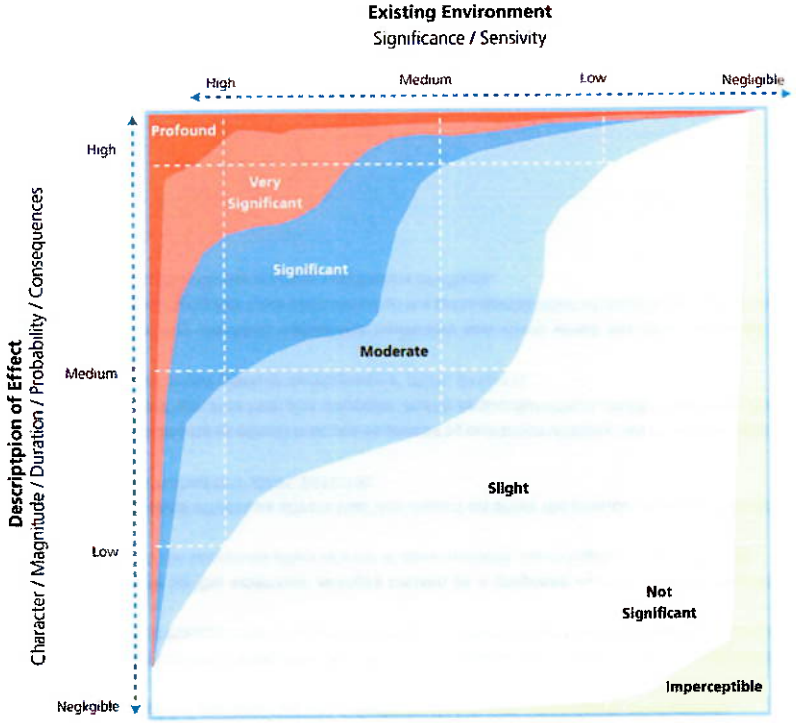


Figure 1: Figure 3.4 of EPA Guidelines on the Information to be contained in Environmental Impact Assessment Reports shows how comparing the character of the predicted effect to the sensitivity of the receiving environment can determine the significance of the effect.

A3.8 Quality of Effects

The predicted impacts are also classified as beneficial (positive), neutral or adverse (negative). This is not an absolute exercise. In particular, visual receptors' attitudes to development, and thus their response to the impact of a development, will vary. However, the methodology applied is designed to provide robust justification for the conclusions drawn. These qualitative impacts / effects are defined as follows:

- **Adverse (negative):** Scheme at variance with landform, scale, pattern. Would degrade, diminish or destroy the integrity of valued features, elements or their setting or cause the quality of the landscape (landscape) / view to be diminished.

- **Neutral:** Scheme complements the scale, landform and pattern of the landscape (landscape) / view and maintains landscape quality.

- **Beneficial (positive):** Scheme improves landscape (landscape) / view quality and character, fits with the scale, landform and pattern and enables the restoration of valued characteristic features or repairs / removes damage caused by existing land uses.

For landscape to a degree, but particularly for visual effects, this is an inherently subjective exercise. This is because landscape and visual amenity are perceived by people and are therefore subject to variations in the attitude and values - including aesthetic preferences - of the receptor. One person's attitude to a development may differ from another person's, and thus their response to the effects of a development on a landscape or view may vary.

Additionally, in certain situations there might be policy encouraging a particular development in an area, in which case the policy is effectively prescribing landscape and visual change. If a development achieves the objective of the policy the resulting effect might be considered positive, even if the landscape character or views are profoundly changed. The classification of quality of landscape and visual effects should seek to take these variables into account and provide a reasonable and robust assessment.

A3.9 Timescale

Impacts / effects are also categorised according to their longevity or timescale:

Duration	Description
Construction Phase	
Temporary	Effects lasting one year or less[1]
Operational Phase	
Short-term	Effects lasting one to seven years
Medium-term	Effects lasting seven to fifteen years
Long-term	Effects lasting fifteen to sixty years
Permanent	Effects lasting over sixty years

Table 6: Impacts / effects are also categorised according to their longevity or timescale.

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Appendix B – CGI by 3D Design Bureau


N
CGI-1
CGI-2
CGI-3
CGI-4
CGI-5
Indicative Outline of Proposed Development











Appendix C – NISA – Acoustic Review and Planning Stage Report by Amplitude Acoustics

Amplitude Acoustics

Thursday 15 October 2026

Project Number: D260302
Reference: D2603022LT1_R1

Mark Gough
Lagan Homes
Suite 5
Providence House
Blanchardstown
Dublin 15

RE: NISA - Acoustic Review and Planning Stage Report

Dear Mark,

Following instruction from Lagan Homes, I have undertaken a peer review of the North Irish Sea Array ("NISA") application to An Coimisiún Pleanála, case reference OA29N.319866. The review has particular regard to noise and vibration from the proposed onshore Grid Facility at Balbriggan, on the lands immediately south of the proposed Grid Facility, within the adopted Flemington Local Area Plan ("LAP"). These lands are intended for residential development and represent the nearest substantial area of potential future residential receptors to the Grid Facility.

This letter presents the principal findings of our review of the noise and vibration information submitted in support of the application. The review has considered:

- the 2024 Environmental Impact Assessment Report ("EIAR");
- the applicant's response to the Commission's request for Further Information ("FI"), published on 29 June 2026;
- the associated technical addenda, appendices and drawings; and
- relevant baseline noise evidence obtained in the vicinity of the proposed residential lands.

The FI response states that post-submission consultation was undertaken with Fingal County Council in relation to the Flemington LAP, in accordance with Section 13(e) of the request for Further Information. Part of that engagement concerned the potential operational noise effects of the Grid Facility on future residents of the LAP lands.

The applicant states that an assessment has subsequently been completed for representative future residential receptors within the LAP lands and concludes that the applicable noise criteria can be achieved, subject to additional mitigation where required. The identified measures include acoustic enclosures around the shunt reactors or, alternatively, the selection of lower-noise shunt reactors and associated coolers. The final plant selection and the detailed specification of these mitigation measures have, however, been deferred to the detailed design stage.

Accordingly, this review considers the adequacy of the baseline noise survey, assessment criteria, source data, noise-modelling methodology, treatment of tonal and low-frequency noise, proposed mitigation and the resulting level of protection afforded to future residents of the Flemington LAP lands.

Statement of Authority

This review has been completed by Amplitude Acoustics, a specialist noise and vibration consultancy. The Amplitude Acoustics team has delivered a substantial number of projects throughout Ireland, Europe, the Middle East, Australasia and North America. Our approach is informed by extensive project experience and a detailed understanding of the technical, environmental and social principles underpinning noise policy and assessment.

The assessment was completed by Dr Emmet English. Emmet holds a degree in Mechanical Engineering and a PhD in Acoustics. He has more than 22 years of professional experience in acoustics, including extensive experience in the assessment of wind-energy developments. He is a member of Engineers Ireland ("MIEI") and the Institute of Acoustics ("IOA").

1.1 Baseline Survey

A review has been undertaken of the baseline noise survey completed by Enfonic between 26 March and 2 April 2026.

The noise-monitoring equipment was deployed at 53.6196525, -6.2046183, close to the northern boundary of the Flemington LAP lands. The monitoring location is considered suitably positioned to characterise the existing noise environment at the LAP boundary closest to the proposed Grid Facility.

The survey was undertaken over approximately seven days. The report indicates that it was completed by personnel meeting the definition of a competent person set out in the EPA publication *Guidance Note for Noise: Licence Applications, Surveys and Assessments in Relation to Scheduled Activities (NG4)*. The instrumentation, measurement parameters and survey duration are generally considered appropriate for establishing the prevailing background sound environment.

The survey results identify periods affected by adverse weather. These periods should be excluded when deriving representative background sound levels. Examination of the remaining valid data indicates that the background sound level, expressed as L_{A90}, falls to approximately 34 dB during the quietest sustained periods of the night. Our review identified a minimum rolling one-hour arithmetic average of approximately 33 dB L_{A90}. The arithmetic average of all valid measurements recorded between 01:00 and 04:00 was approximately 34 dB L_{A90}.

Against this context, the applicant's adoption of 34 dB L_{A90}as the representative night-time background sound level is considered reasonable for assessing operational noise from the Grid Facility. It is representative of the lower background sound levels occurring during the night and does not appear to overstate the existing acoustic environment.

1.2 Modelling

The principal document describing the noise-modelling methodology is the Chapter 30 – Noise and Vibration Addendum, submitted as part of the Further Information response in June 2026.

The Addendum states that operational noise levels were modelled using SoundPLAN version 9.1, implementing ISO 9613-2 for the calculation of outdoor sound propagation. Following review, the following observations are warranted.

The model uses indicative equipment sound-power levels derived from data from previous projects. In our experience, sound-power levels can vary by approximately 5 dB or more between equipment suppliers and models, with potentially material differences in their frequency characteristics. Reliance on indicative source data therefore introduces a significant degree of uncertainty, particularly where the final plant selection and guaranteed octave-band sound-power spectra have not been confirmed. The assessment should be updated, or compliance otherwise demonstrated, using supplier-guaranteed sound-power data for the final equipment selection.

ISO 9613-2:1996 indicates an estimated accuracy of approximately ±3 dB for broadband A-weighted predictions within the source-to-receiver height and distance ranges specified in Table 5 of the standard. This represents the estimated accuracy of the propagation method under the conditions specified in the standard; it does not account for uncertainties in source data, plant layout, source directivity, operating load, enclosure performance or barrier design. Furthermore, ISO 9613-2 does not quantify the accuracy of individual octave-band predictions and does not state an uncertainty for one-third-octave-band predictions.

The Addendum does not provide sufficient information regarding the principal SoundPLAN settings. In particular, the adopted ground factors, meteorological correction, reflection order, source directivity, terrain model and treatment of buildings have not been adequately reported. These inputs can materially influence the predicted levels and should be

provided to allow the model to be independently reviewed. A sensitivity assessment using acoustically hard ground should also be undertaken, having regard to the potential future development and hard landscaping of the LAP lands.

The receiver height adopted in the operational noise model is not identified. Receiver height can materially affect predicted levels, particularly where acoustic barriers or partial enclosures have been included. If a receiver height of 2 m has been adopted—as appears to have been used for the operational wind-turbine assessment—this may understate the potential impact at upper-floor receptors within the LAP lands.

Modern residential developments commonly include duplex units and low-rise apartment buildings, for which upper-floor receiver heights may be approximately 7.5 m or greater. The applicant should therefore confirm the receiver heights used and provide predictions at heights representative of a typical residential development, including, as a minimum, 2 m, 4.5 m and 7.5 m above local ground level.

The assessment appears to rely on predicted levels at a limited number of discrete receptors. Noise contours have not been provided across the LAP lands. The absence of contours makes it difficult to establish the spatial extent of the impact, identify the areas experiencing the highest levels or determine how the predicted levels vary with distance from the Grid Facility. Noise contours should be provided across the full developable area at each representative receiver height.

Three-sided barriers or partial enclosures appear to have been included around elements of the shunt reactors and associated coolers, harmonic filters and other Grid Facility equipment. However, the acoustic performance of these measures depends on their height, length, orientation, proximity to the equipment, panel construction and mass, the presence of a roof, and the treatment of openings and ventilation paths. These parameters have not been adequately defined, and it is therefore not possible to independently verify the attenuation attributed to the proposed mitigation.

This is particularly important because barrier effectiveness generally reduces at lower frequencies, where diffraction around and over the barrier becomes more significant. The proposed electrical equipment is understood to generate substantial low-frequency and potentially tonal noise. The applicant should provide dimensioned plans and sections of each proposed barrier or enclosure, together with octave-band insertion-loss data and supporting calculations demonstrating the attenuation applied within the model.

The source data and receptor predictions are presented principally in octave bands and as overall A-weighted levels. No one-third-octave-band or narrowband spectra have been provided. Octave-band data can conceal discrete tones, harmonics and concentrated low-frequency energy within an individual band. The absence of higher-resolution spectral information therefore limits the assessment of tonality and may understate the subjective audibility and potential significance of the low-frequency characteristics of the plant, even where the overall A-weighted level is relatively low.

1.3 Closing Statement

The submitted documentation does not, in our opinion, adequately demonstrate that the predicted operational noise levels can be achieved through a sufficiently defined and technically substantiated acoustic mitigation design. The assessment relies on assumed reductions in equipment sound-power levels and the performance of barriers, silencers and partial enclosures, without providing sufficient project-specific evidence to verify that these measures will deliver the necessary attenuation in practice.

This uncertainty is particularly relevant given the proximity of the proposed Grid Facility to the Flemington LAP residential lands and the relatively low prevailing night-time background noise levels. The assessment has not adequately demonstrated the effectiveness of the proposed mitigation at low frequencies, including the potential for tonal noise around 100 Hz, or established the predicted noise exposure across the LAP lands at heights representative of future residential development. Furthermore, the applicant's assessment identifies potentially significant adverse noise effects during emergency operation at certain LAP receptors.

Consequently, we do not consider that the submitted acoustic assessment provides a sufficiently robust basis to conclude that the proposed Grid Facility will operate without significant adverse noise effects on future residential development within the Flemington LAP lands. The predicted compliance remains dependent on the successful implementation of mitigation measures whose installed performance has not been adequately demonstrated.

We recommend that further acoustic design information and supporting calculations be provided to establish the technical feasibility and effectiveness of the proposed mitigation before a definitive conclusion on operational noise effects is reached. Should planning permission nevertheless be granted, a suitably detailed and enforceable acoustic planning condition will be essential to secure the required performance, including approval of the final acoustic design and post-commissioning verification.

Please let me know if you have any questions on the above.

Yours sincerely,

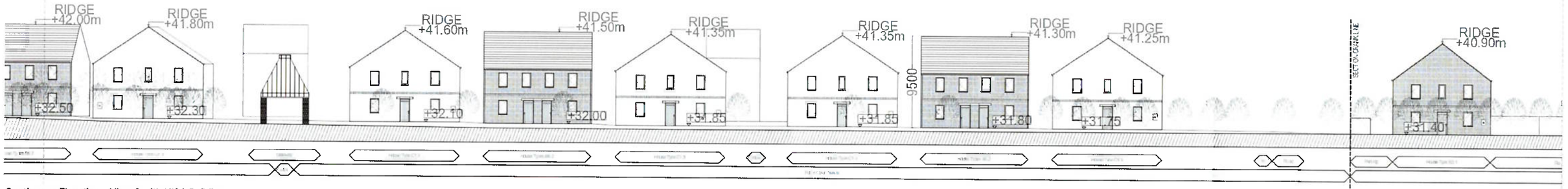


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Appendix D – Drawings by JFOC Architects



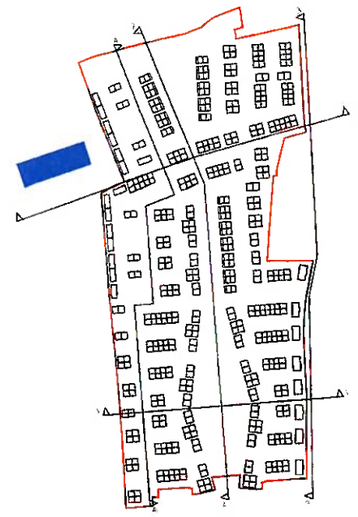
Contiguous Elevation - View 2 with NISA Building



Contiguous Elevation - View 2 with NISA Building



Contiguous Elevation - View 2 with NISA Building



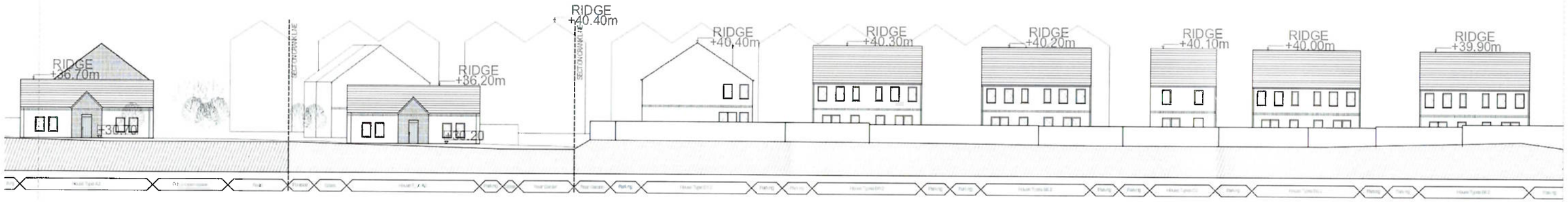
Site Key Plan
Not to Scale

		Logan Homes Ballinger Ltd	Residential Development at Flemington, Ballinger, Co. Dublin	Contiguous Elevation View 2 NISA Development	1:200 @ A0 1:400 @ A3	Design	25.113.PD 8003	A

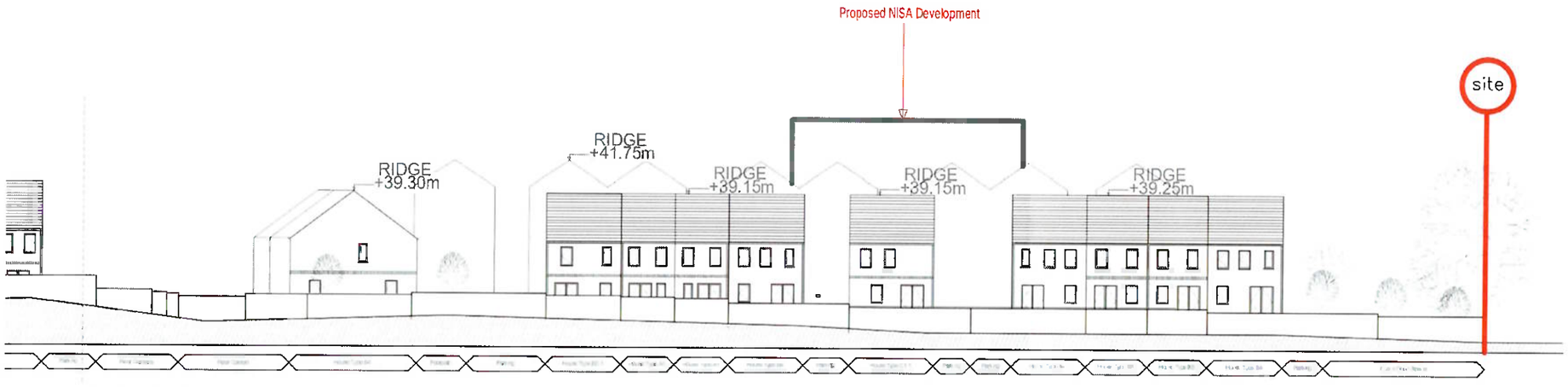
JFOC ARCHITECTS



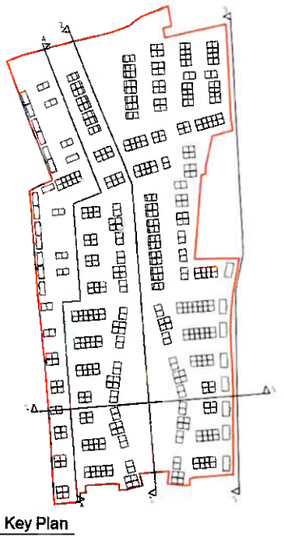
Contiguous Elevation - View 3



Contiguous Elevation - View 3



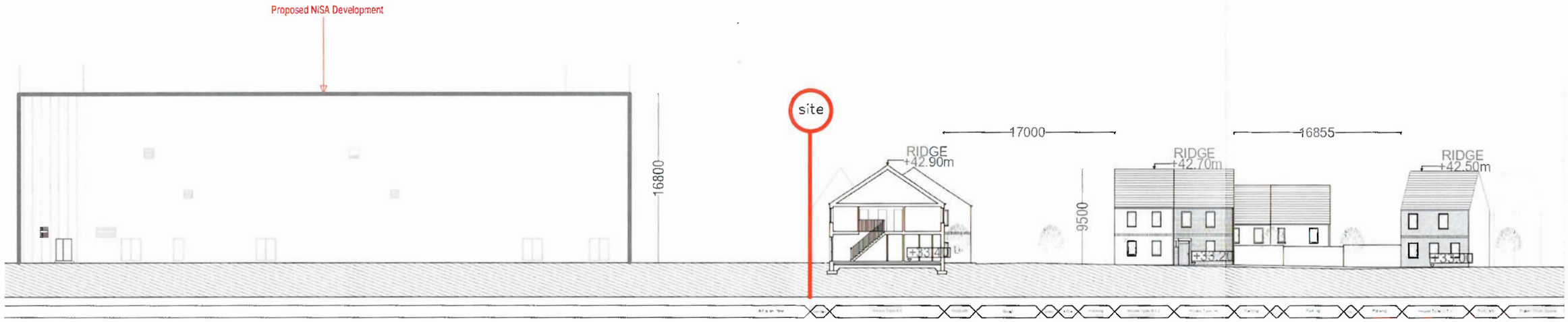
Contiguous Elevation - View 3



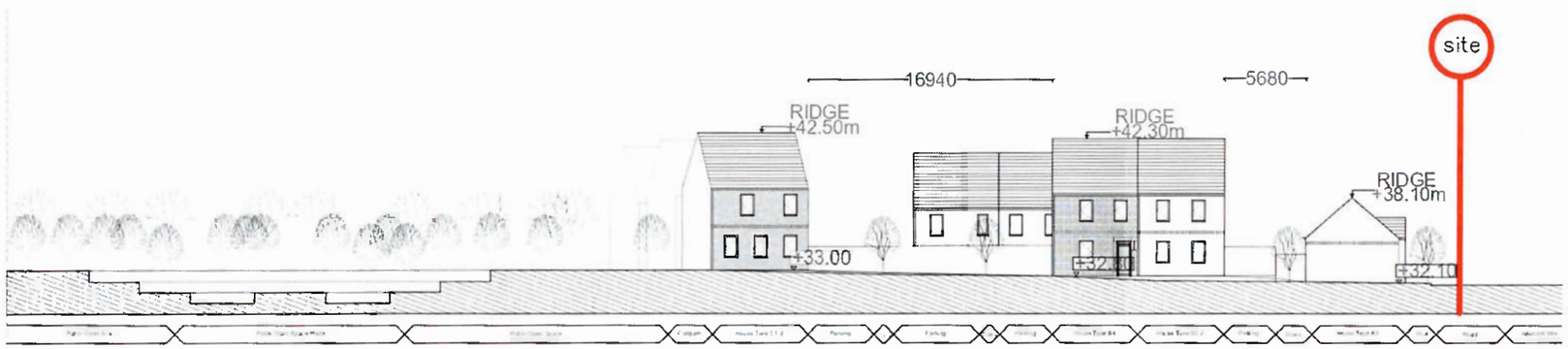
Site Key Plan
Not to Scale

Logan Homes Balbriggan Ltd	Residential Development at Remington, Balbriggan Co. Dublin	Contiguous Elevation View 3 - NISA Development	1:200 @ A1 1:400 @ A3	Design	25.113.PD 6003	A

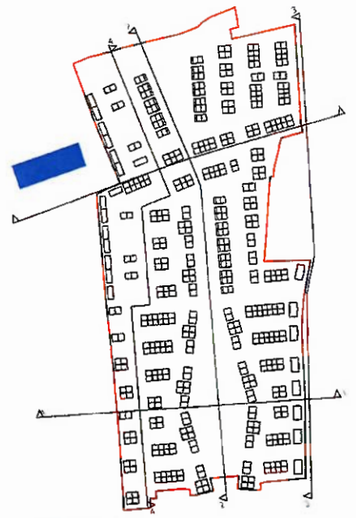
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Contiguous Elevation - View 1 with NISA Building

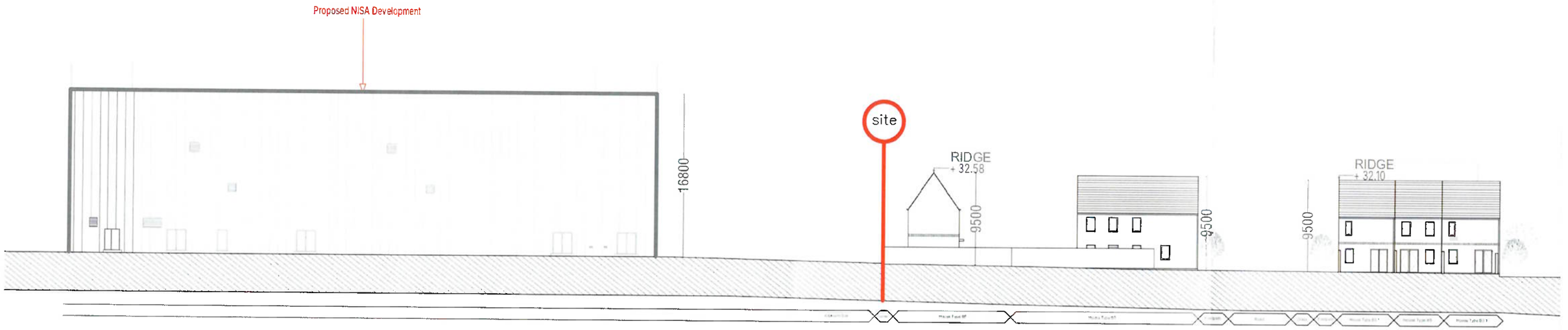


Contiguous Elevation - View 1 with NISA Building

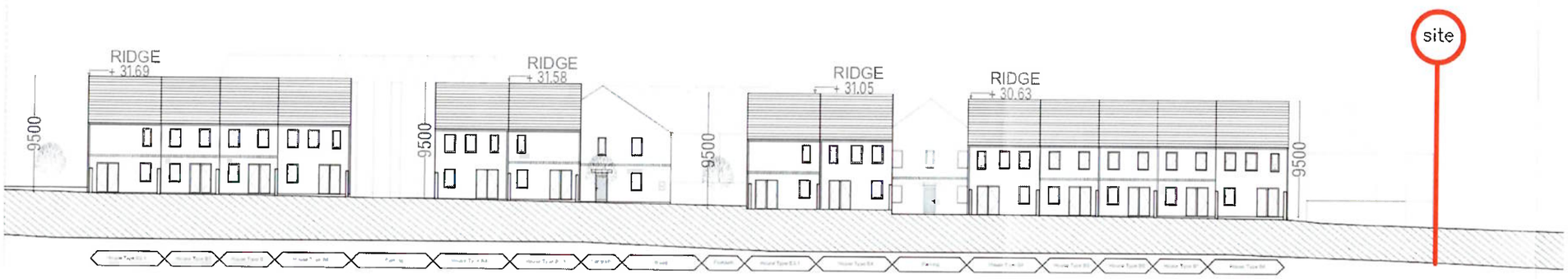


Site Key Plan
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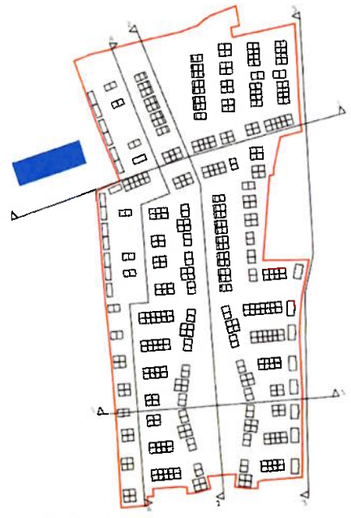
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Contiguous Elevation - View 5 with NISA Building



Contiguous Elevation - View 5 with NISA Building



Site Key Plan
Not to Scale

		Lagan Homes Balheggan Ltd	Residential Development at Rahengton Balheggan, Co. Dublin	Contiguous Elevation View 5 NISA Development	1:200 @ A1 1:400 @ A3 MD	Design	
						25.113.PD 8905	A

JFOC ARCHITECTS