

**Planning Report  
for a Section 146B Request**

*In respect of*

**Proposed Alterations to a permitted development  
comprising a 110kV Gas Insulated Switchgear (GIS)  
Substation and 110kV Transmission Line Connections**

*Prepared by*

**John Spain Associates**

*On behalf of*

**Crag Wicklow Limited**

**February 2026**



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## CONTENTS

1.0	..... INTRODUCTION AND EXECUTIVE SUMMARY.....	2
2.0	..... SITE LOCATION AND CONTEXT.....	4
3.0	.....RELEVANT PLANNING HISTORY.....	6
4.0	..... DESCRIPTION OF PROPOSED ALTERATIONS .....	7
5.0	..... ASSESSMENT UNDER 146B OF THE P & D ACT 2000 .....	10
6.0	..... APPROPRIATE ASSESSMENT.....	14
7.0	..... SUMMARY AND CONCLUSIONS.....	15

## 1.0 **INTRODUCTION AND EXECUTIVE SUMMARY**

- 1.1 On behalf of the applicant Crag Wicklow Limited, we wish to make a request to An Coimisiún Pleanála, pursuant to section 146B of the Planning & Development Act 2000 (as amended) for alterations to a Strategic Infrastructure (Electricity Transmission) Development permitted under ABP Reg Ref.: 315200-22 on the 30<sup>th</sup> of November 2023. The permitted development consists of the following:

*“The proposed development primarily comprises the provision of a new 110 kV substation with Gas Insulated Switchgear (GIS) technology and two 110 kV underground transmission cables (connecting to existing 220 kV overhead lines to the northwest of the proposed substation) along with associated and ancillary works. The proposed development is located within the townlands of Bogland, Kish, Cooladangan, Ballintombay, Ballyroonaun, and Ballynattin, Co. Wicklow. The site of the proposed development has an area of c. 8.68 hectares.*

*The proposed 110kV GIS Substation is to be located on lands to the northwest of the ICT facility development permitted under Wicklow County Council Reg. Ref.: 20/1088, within an overall landholding bound to the south / southwest by the existing Kish Business Park, to the southeast by dwellings and Kish Road, to the west by the Dublin-Rosslare railway line (beyond which is the R772 and the M11), and to the east and north by agricultural lands.*

*The development is described as follows:*

*The proposed substation compound is subdivided into two parts. The southern part of the compound will accommodate and a two storey 110kV GIS substation building (with a gross floor area of c. 1,299 sq.m). The northern part of the compound will accommodate four transformers, a single storey client control building (with a gross floor area of c. 419 sq.m) and associated underground services. Both parts of the substation compound are enclosed within c. 2.4 metre high security fencing.*

*The proposed dropdown 110kV transmission lines will connect the proposed 110kV GIS substation building to existing 110kV overhead transmission lines to the northwest of the proposed substation (the Arklow Banoge 110kV overhead line) and will comprise the provision of two dropdown masts (c. 17 metres in height) and associated overhead transmission line connections, transitioning to underground transmission lines set within ducts, that will subsequently progress into the 110kV GIS substation building.*

*The proposed 110kV underground transmission lines will primarily run through undeveloped lands, agricultural lands, and via public roads between the proposed 110kV GIS substation and existing Arklow – Banoge overhead lines to the northwest of the site.*

*The proposed 110kV underground transmission lines form a loop that will be divided into two circuits, Circuits A and B. Proposed Circuit A proceeds from the site of the SID Planning Report – Oaklands 110kV Substation and Transmission Line Connections John Spain Associates 4 Planning & Development Consultants proposed 110kV GIS substation westwards, crossing the nearby railway line, then proceeds south-west along the R772 to cross the Moneylane Stream and crosses underneath the M11 motorway at Junction 21, then proceeds along the L6187, enters agricultural lands adjacent to Knockenrahan Road, and terminates at the existing 110 kV Arklow – Banoge overhead line. Proposed Circuit B proceeds from the site of the proposed 110kV GIS substation westwards, crossing the*

*nearby railway line, the Moneylane Stream, the R772, and the M11, then traverses lands within the Arklow IDA Business Park, and open agricultural lands adjacent to the M11 and Knockenrahan Road (L2190) and terminates at the existing 110 kV Arklow – Banoge overhead line.*

*The development includes adjacent access paths, connections to the substation and to the overhead lines, removal of redundant overhead lines, landscaping and landscape screening to the proposed GIS substation compound, security fencing, provision of internal access roads and car parking (9 no. spaces) within the substation compound, services, all associated construction works, and all ancillary works.”*

- 1.2 The proposed alterations being sought can be summarised as follows:
- Alterations to the alignment of the permitted underground transmission lines Circuit A and B, to realign Circuit B to run parallel to Circuit A.
  - Alteration of the location of the permitted drop-down masts to facilitate the realignment of Circuit B.
  - Change in the overall length of Circuit A from 2,888m to 2,872m and B to from 2,164m to 3,074m to facilitate the realignment.
  - Removal of HDD crossing under M11 on account of the proposed alterations.
- 1.3 Section 146B of the Act provides for alteration by the Commission of strategic infrastructure development on request made of it. We have been advised by An Coimisiún Pleanála that proposed amendments to a previously permitted SID (Electricity Transmission) development should be sought under the provisions of section 146B of the Planning and Development Act 2000 (as amended). Therefore, an assessment of the proposed alterations under the provisions of section 146B is included in this Planning Report provided by John Spain Associates, and accompanying Environmental Report prepared by AWN Consulting and Report for the purposes of Appropriate Assessment Screening prepared by Moore Group which informed the AWN report.
- 1.4 Under the terms of section 146B(2)(a) the Commission must decide as soon as practicable, whether or not the making of a proposed alteration would constitute “*the making of a material alteration of the terms of the development concerned*”. If the Commission decides that the alteration proposed would not constitute a material alteration, the Commission must proceed to alter the permission (section 146B(3)(a)).
- 1.5 Section 146B(4) provides that before making a determination under subsection (3)(b), the Commission shall determine whether the extent and character of the alteration requested, were it to be made, would be likely to have significant effects on the environment.
- 1.6 As set out in this report and as demonstrated by the accompanying drawings it is submitted that the proposed alterations are not material and are unlikely to have significant effects on the environment, given they reduce impacts of the development on private lands, remove the requirement for a HDD crossing and avoid works on the R772, by altering the grid connection route layout, to avoid the need to route along two diverse routes, instead running both underground connections along a single routing. This is further supported by relevant precedents set out within the following sections of this report.
- 1.7 We therefore respectfully request, as set out herein, that the Commission decide that the making of the alterations subject of this request do not constitute the making of a material alteration of the terms of the substation and electricity transmission lines development as granted permission.

- 1.8 However, if the Commission decides that the proposed alterations are material, we wish to refer the Commission to Section 5 of this Report and to the accompanying Environmental Report prepared by AWN Consulting in association with Moore Group, which sets out the main environmental issues in relation to the proposed alterations. The topics in the original Environmental Impact Assessment Report are reviewed in the context of the proposed alterations. It is considered that the proposed alterations could not reasonably be expected to have any significant effects on the environment and that they would not result in any significant impact on any European Site.
- 1.9 The alterations which are now sought have arisen out of the detailed design of the permitted electricity transmission lines post planning, and on foot of ongoing engagement with ESB/EirGrid. The resulting layout is more efficient and will reduce the impact of construction of the transmission lines, having regard to the fact that construction will take place across a single consolidated route, rather than requiring road opening along two routes.
- 1.10 The alterations to the permitted cable alignment do not result in any material change to the function, construction methodology, or design of the permitted development, and will not result in any change to the conclusions or mitigation measures already provided for the development within the EIAR and AA Screening Report submitted with the original application.

## **2.0 SITE LOCATION AND CONTEXT**

- 2.1 The permitted development to which the current alterations relate comprises the provision of a 110kV substation with Gas Insulated Switch Gear (GIS) technology and two 110kV underground transmission cables (connecting to existing overhead lines to the northwest of the permitted substation) within the townlands of Bogland, Kish, Cooladangan, Ballintomby, Ballyroonaun and Ballynattin, Co, Wicklow.
- 2.2 The 110kV substation with GIS technology and two 110kV underground transmission cables were granted permission by An Bord Pleanála under ABP Ref.: 315200-22 on 1 December 2023.
- 2.3 The site of the permitted substation is located to the north of Kish Business Park. The R772 and the M11 are approximately 350m and 500m west of the substation site respectively. Junction 21 of the M11 is approximately 700m southwest of the substation site. Arklow town can be accessed via the R772, while the M11 provides excellent connectivity to the surrounding area.



**Figure 2.1: Approximate location of permitted substation**

- 2.4 The permitted development, also provides permission for transmission line connections between the GIS substation and the existing Arklow – Banoge 110kV overhead line via two circuits, Circuit A and B.
- 2.5 The permitted Circuit A proceeds from the site of the 110kV GIS substation westwards, crossing the nearby railway line, then proceeds south-west along the R772 to cross the Moneylane Stream and crosses underneath the M11 motorway at Junction 21, then proceeds along the L6187, enters agricultural lands adjacent to Knockenrahan Road, and terminates at the existing 110 kV Arklow – Banoge overhead line.
- 2.6 The permitted Circuit B proceeds from the site of the 110kV GIS substation westwards, crossing the nearby railway line, the Moneylane Stream, the R772, and the M11, then traverses lands within the Arklow IDA Business Park, and open agricultural lands adjacent to the M11 and Knockenrahan Road (L2190) and terminates at the existing 110 kV Arklow – Banoge overhead line.
- 2.7 The permitted Circuit A has a total distance of c. 2,888m; the permitted Circuit B has a total distance of c. 2,164m.

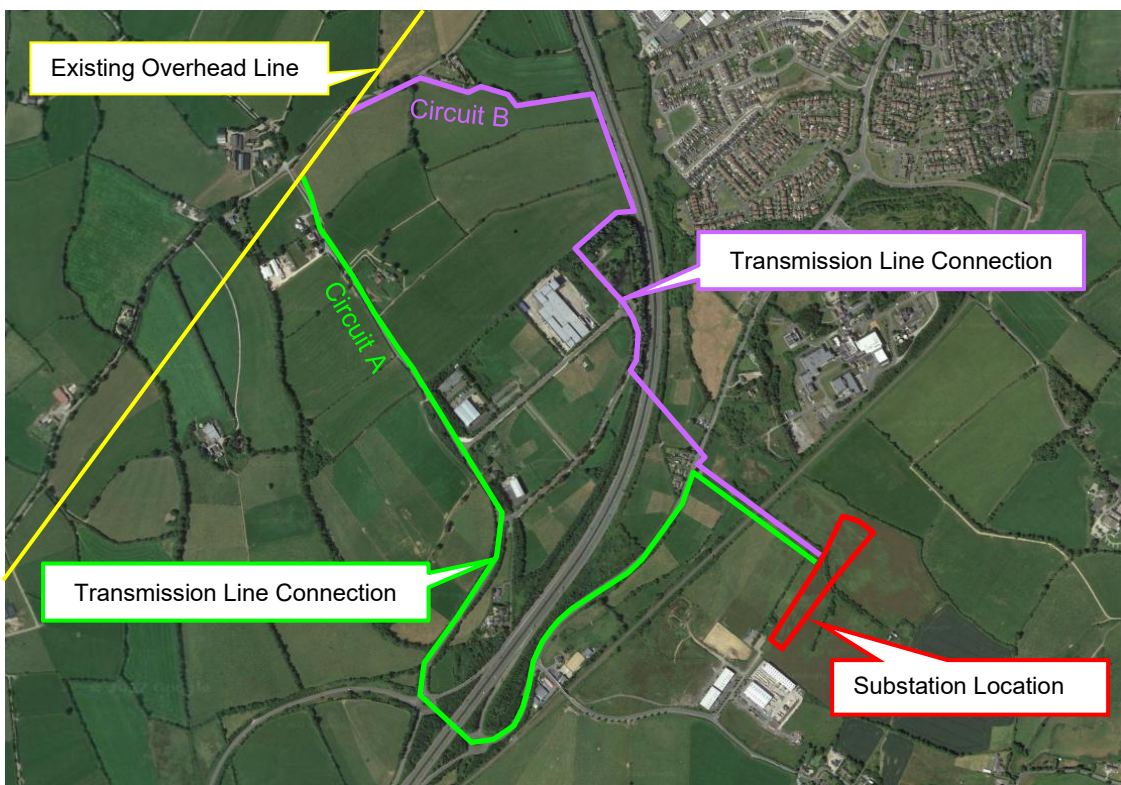


Figure 2.2: Approximate location of permitted transmission cables

### 3.0 RELEVANT PLANNING HISTORY

3.1 The following section provides an overview of the most relevant planning history for the subject lands and surrounding area.

#### **Permitted GIS Substation and Underground Transmission Lines to which Alterations Relate – ABP Reg. Ref.: 315200-22**

3.2 *ABP Reg. Ref.: 315200-22*

On the 24<sup>th</sup> of November 2022, a Strategic Infrastructure (Electricity Transmission) Development application was submitted to An Bord Pleanála in respect of the following proposed development:

*“The proposed development primarily comprises the provision of a new 110 kV substation with Gas Insulated Switchgear (GIS) technology and two 110 kV underground transmission cables (connecting to existing 220 kV overhead lines to the northwest of the proposed substation) along with associated and ancillary works. The proposed development is located within the townlands of Bogland, Kish, Cooladangan, Ballintombay, Ballyroonaun, and Ballynattin, Co. Wicklow. The site of the proposed development has an area of c. 8.68 hectares.*

*The proposed 110kV GIS Substation is to be located on lands to the northwest of the ICT facility development permitted under Wicklow County Council Reg. Ref.: 20/1088, within an overall landholding bound to the south / southwest by the existing Kish Business Park, to the southeast by dwellings and Kish Road, to the west by the Dublin-Rosslare railway line (beyond which is the R772 and the M11), and to the east and north by agricultural lands.*

*The development is described as follows:*

*The proposed substation compound is subdivided into two parts. The southern part of the compound will accommodate and a two storey 110kV GIS substation building (with a gross floor area of c. 1,299 sq.m). The northern part of the compound will accommodate four transformers, a single storey client control building (with a gross floor area of c. 419 sq.m) and associated underground services. Both parts of the substation compound are enclosed within c. 2.4 metre high security fencing.*

*The proposed dropdown 110kV transmission lines will connect the proposed 110kV GIS substation building to existing 110kV overhead transmission lines to the northwest of the proposed substation (the Arklow Banoge 110kV overhead line) and will comprise the provision of two dropdown masts (c. 17 metres in height) and associated overhead transmission line connections, transitioning to underground transmission lines set within ducts, that will subsequently progress into the 110kV GIS substation building.*

*The proposed 110kV underground transmission lines will primarily run through undeveloped lands, agricultural lands, and via public roads between the proposed 110kV GIS substation and existing Arklow – Banoge overhead lines to the northwest of the site.*

*The proposed 110kV underground transmission lines form a loop that will be divided into two circuits, Circuits A and B. Proposed Circuit A proceeds from the site of the SID Planning Report – Oaklands 110kV Substation and Transmission Line Connections John Spain Associates 4 Planning & Development Consultants proposed 110kV GIS substation westwards, crossing the nearby railway line, then proceeds south-west along the R772 to cross the Moneylane Stream and crosses underneath the M11 motorway at Junction 21, then proceeds along the L6187, enters agricultural lands adjacent to Knockenrahan Road, and terminates at the existing 110 kV Arklow – Banoge overhead line. Proposed Circuit B proceeds from the site of the proposed 110kV GIS substation westwards, crossing the nearby railway line, the Moneylane Stream, the R772, and the M11, then traverses lands within the Arklow IDA Business Park, and open agricultural lands adjacent to the M11 and Knockenrahan Road (L2190) and terminates at the existing 110 kV Arklow – Banoge overhead line.*

*The development includes adjacent access paths, connections to the substation and to the overhead lines, removal of redundant overhead lines, landscaping and landscape screening to the proposed GIS substation compound, security fencing, provision of internal access roads and car parking (9 no. spaces) within the substation compound, services, all associated construction works, and all ancillary works.”*

- 3.3 The Board issued an Order to grant permission on the 30<sup>th</sup> of November 2023. The grant of permission for the development was subject to 15 conditions in total. As will be set out in further detail hereafter, the alterations now sought are not considered to represent a material alteration to the terms of the development as permitted.

#### **4.0 DESCRIPTION OF PROPOSED ALTERATIONS**

- 4.1 It is noted that section 146B of the Act provides that “any person who is carrying out or intending to carry out a strategic infrastructure development” can request alterations to said development under this section of the Act.

- 4.2 The proposed alterations to the Strategic Infrastructure Development, which this Section 146B relates to, can be summarised as the modification of the permitted alignment of the two 110kV underground transmission lines, Circuit A and Circuit B, to realign Circuit B to run parallel to Circuit A, instead of running along a separate route through different public roads and private lands. Details of the proposed alterations are provided below.
- 4.3 In the proposed alterations, Circuit A generally follows the same alignment as in the permitted development, with some minor changes. As permitted, Circuit A proceeds westwards from the site of the substation, crossing the rail line. Next, instead of running along the R772, it traverses agricultural lands adjacent to the R772 travelling south-west, before rejoining a short section of the R772 and crossing underneath the M11 at Junction 21. It then proceeds along the L6817 before entering agricultural lands to the east of the L6187, terminating at the existing Arklow-Banoge overhead line.
- 4.4 Minor changes to the alignment of Circuit A occur where the circuit connects to the substation; where it crosses the M11; and where it enters agricultural lands from the L6187 to connect drop down mast and overhead line.
- 4.5 The proposed modified Circuit B will proceed westwards from the site of the 110kV GIS substation, crossing the nearby rail line, then proceed south-west parallel to the R772 and Circuit A, cross the Moneylane Stream and then cross underneath the M11 motorway at Junction 21. It will then proceed along the L6187, continuing until it meets Knockenrahan, then proceed north-east along part of the Knockenrahan Road before entering agricultural lands adjacent to Knockenrahan Road to the south, terminating at the existing 110kV Arklow – Banoge overhead line.
- 4.6 The position of the permitted drop-down masts is also proposed to be adjusted slightly to facilitate the realignment of the circuits.
- 4.7 Under the proposed alterations, the overall length of Circuit A will reduce slightly to 2,872m and the overall length of Circuit B will increase slightly to 3,074m.

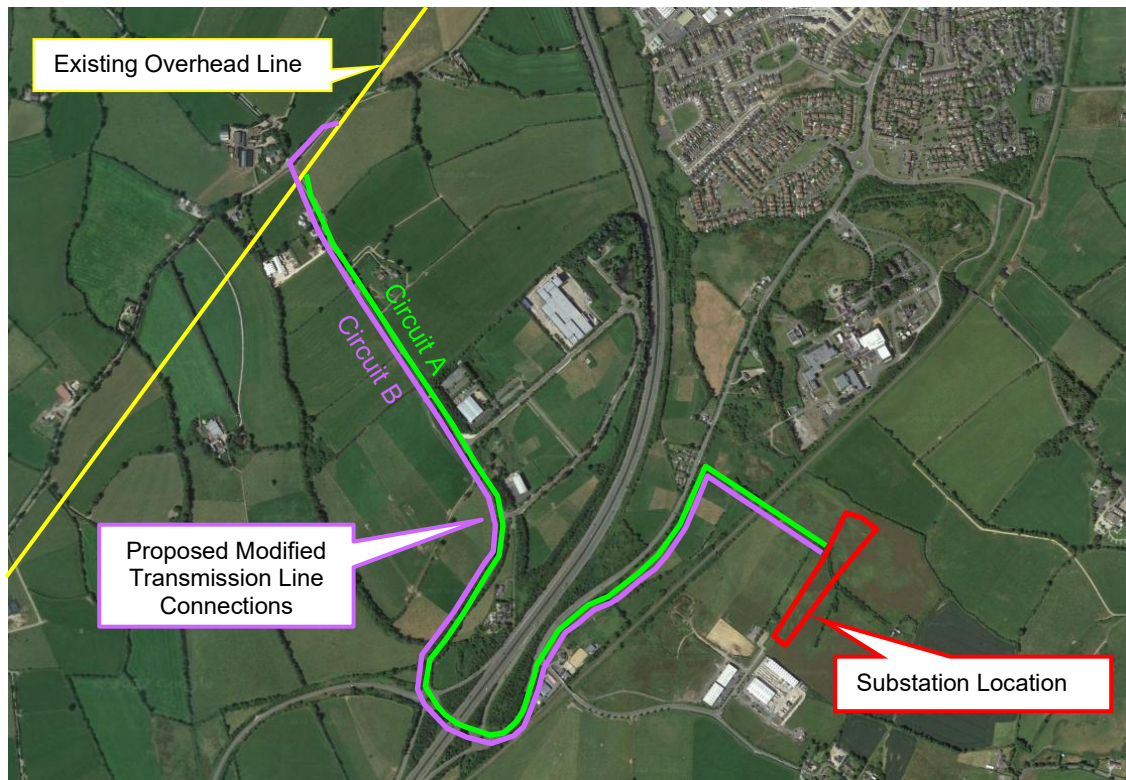


Figure 4.1: Approx. location of proposed modified transmission lines

#### Rationale for Proposed Alterations

- 4.8 The proposed amendments are primarily sought to minimise the land take required for the circuits and in turn reduce the impacts of the development on adjacent private lands and roadways.
- 4.9 Additionally, the proposed amendments have been designed to avoid works on the recently upgraded R772 road as requested by Wicklow County Council and remove the requirement for a HDD crossing under the existing M11 motorway for Circuit B.
- 4.10 The alterations, when considered individually or cumulatively, are not considered to constitute the making of a material alteration to the terms of the existing planning permission.

#### Relevant Precedents

- 4.11 It is noted that there are relevant precedents for similar changes and more significant alterations to permitted s. 182 Electricity Transmission SID developments being considered immaterial by An Bord Pleanála. Previous precedents have included the movement of transmission line alignments, and changes resulting in the alignment of cables falling outside of the original application red line boundary.
- 4.12 Two such examples are provided below, and it is respectfully requested that the Commission have regard to these relevant precedents when considering the minor alterations sought to the subject approved Electricity Transmission SID.

ABP Reg. Ref.: VM0009

- 4.13 Alterations were sought to previously approved development of the Clashavoon to Dunmanway 110kV overhead line in 2015. The alterations consisted of alterations to the permitted cable route, including movement of permitted pole-sets. The alterations affected numerous stretches of the overall route, and a significant number of pole-sets.
- 4.14 The Board considered that the alterations did not constitute a Material Alteration (a decision which was also supported by the Board's Inspector). This alteration included movement of the permitted alignment up to 54 metres.

ABP Reg. Ref.: VM0006

- 4.15 In 2014, a request was submitted to the Board for amendments to the previously approved North Kerry 220/110kv High Voltage Transmission System in the Southwest of Kerry. The proposed alterations were described within the Inspector's Report as follows:

*“The cable would be laid in the road over a bridge when crossing a river at Patch, identified as crossing no. 9. Under the approved drawings the cable would have been bolted to the downstream face of the bridge. Crossings nos. 2 and 6 would now be laid in a trench in the public road, whereas the approved drawings show them in trenches laid off road under the watercourse. The submitted drawings show the location of 9 crossings more precisely than those on the drawings submitted with the application for approval. The applicant states that the proposed amendments in this regard are the result of detailed design work which was envisaged but not concluded when the board granted approval.*

*8 joint bays, which would have been constructed under the public road, would now be c.6m from the edge of the road and so outside the red line for the application for approval. Joint bays are concrete structures that are required at regular intervals along the route to allow cables to be pulled through the ducts and for cables to be joined. The location of these bays outside the public road will require the line of the cable to be laid outside the public road in their vicinity for lengths of 16m to 34m. The applicant states that the amendment is a result of consultations with the roads authority and is designed to avoid disruption to traffic.”*

- 4.16 The Board's Inspector concluded that the alterations sought did not comprise a Material Alteration. The Board duly altered the terms of the permission.
- 4.17 It is respectfully submitted that both of the foregoing alteration requests pertained to changes to permitted electricity transmissions developments that were generally similar in nature to those now sought to the subject transmission lines to the north of Kish Business Park, Arklow. It is respectfully requested that the Commission have regard to these precedents in finding that the alterations now proposed are not material.

**5.0 ASSESSMENT UNDER 146B OF THE PLANNING & DEVELOPMENT ACT 2000 (AS AMENDED)**

- 5.1 Section 146B of the 2000 Act provides for alteration by the Board of strategic infrastructure development on request made of it. Therefore, an assessment of the proposed alterations under the provisions of section 146B is included below.

- 5.2 Under the terms of section 146B(2)(a) the Commission must decide as soon as possible, whether or not the making of a proposed alteration would constitute “*the making of a material alteration of the terms of the development concerned*”. If the Commission decides that the alteration proposed would not constitute a material alteration, the Commission must proceed to alter the permission (section 146B(3)(a)).
- 5.3 Section 146B(4) provides that before making a determination under subsection (3)(b), the Board shall determine whether the extent and character of the alteration requested under subsection, were it to be made, would be likely to have significant effects on the environment.

### **Consideration of Materiality**

- 5.4 As noted above, the first consideration in relation to this request for alterations to the Strategic Infrastructure Development permitted under ABP Reg Ref.: 315200-22 is to determine if the making of the alteration would constitute the making of a material alteration of the development as granted. This will be assessed hereunder having regard to the proposed alterations outlined in Section 4 above and to the consideration of the impact on the environment arising from the alterations (or lack thereof) set out in the accompanying Environmental Report prepared by AWN.
- 5.5 As noted above, the alterations consist of the following:
- Alterations to the alignment of the permitted underground transmission lines Circuit A and Circuit B, to realign Circuit B to run parallel to Circuit A.
  - Alteration of the location of the permitted drop-down masts to facilitate the realignment of Circuit B.
  - Change in the overall length of Circuit A to 2,872m and B to 3,074m to facilitate the realignment.
  - Removal of HDD crossing under M11 on account of the proposed alterations.
- 5.6 The alignment of Circuit A remains generally the same as in the permitted development.
- 5.7 The proposed modified alignment of Circuit B runs parallel to Circuit A, generally following the permitted alignment of Circuit A. However, the proposed Circuit B runs slightly longer than Circuit A, continuing north-west along the L6187 until it meets Knockenrahan Road and traverses part of Knockenrahan Road before entering into the agricultural lands where the drop-down masts are proposed.
- 5.8 The location of the drop-down masts is adjusted slightly to facilitate the proposed realignment of Circuit B.
- 5.9 On account of the proposed alterations, Circuit B no longer traverses lands within the Arklow IDA Business Park or substantial portions of agricultural lands adjacent to the M11 and Knockenrahan Road. The separate HDD crossing under the M11 motorway on Circuit B is also no longer required due to the proposed alterations.
- 5.10 As set out below, none of these alterations will result in a material change to the appearance, construction, or operation of the development. In fact, they will reduce the scale of the development by effectively routing the two cables along the same routing, rather than requiring two separate routes as originally permitted. As such, it is envisaged that at the minimum there will be no change to the environmental impact of proposed amended development in comparison with the permitted development. However, it is likely

that the overall environmental impact of the development will be reduced on foot of the proposed changes.

- 5.11 In summary it is considered that the proposed alterations do not constitute a material change to the scheme as permitted.

### **Environmental Assessment**

- 5.12 As noted herein, section 146B(4) of the 2000 Act provides that before making a determination under subsection (3)(b), the Commission shall determine whether the extent and character of the alteration requested are such that the alteration, were it to be made, would be likely to have significant effects on the environment.
- 5.13 An Environmental Report prepared by AWN Consulting reviewing the potential environmental impacts of the proposed amended development in comparison to the permitted development, in line with the key areas assessed in the original Environmental Impact Assessment Report accompanies this report. It is considered that the proposed alterations could not reasonably be expected to have any significant effects on the environment, either alone or when considered cumulatively.
- 5.14 The AWN report also sets out that the proposed alterations are insignificant in the context of potential ecological impacts and will not result in any likely significant effect on any European Site.
- 5.15 This section sets out the main environmental issues in relation to the proposed alterations as noted within the accompanying Environmental Report prepared by AWN Consulting. The topics in the original Environmental Impact Assessment Report for the original SID are reviewed in the report prepared by AWN. It is considered that the proposed alterations could not reasonably be expected to have any significant effects on the environment, either alone or when considered cumulatively.
- 5.16 The Report for the purposes of Appropriate Assessment Screening prepared by Moore Group also sets out that the proposed alterations are insignificant in the context of potential ecological impacts and will not result in any likely significant effect on any European Site.

**TABLE 5.1: TOPICS FROM ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIAR) FOR THE PERMITTED STRATEGIC INFRASTRUCTURE DEVELOPMENT**

Chapter	Title	Content
4	Human Health and Populations	There are no additional human health and population impacts as a result of the proposed realignment. The proposed realignment will reduce the number of sensitive receptors and reduce the number of highly sensitive residential properties within 20m of the circuits.
5	Land, Soils, Geology & Hydrogeology	Proposed relocation of the two Circuits will be minor and will not materially change the identified impacts on land, soils, geology and hydrogeology from the original submission during both the construction and operational phase
6	Hydrology	Proposed changes will not materially change the identified hydrological impacts outlined in the ER for the original submission. Proposed minor changes to Circuit A will place the proposed development closer to the Moneylane 10

**TABLE 5.1: TOPICS FROM ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIAR) FOR THE PERMITTED STRATEGIC INFRASTRUCTURE DEVELOPMENT**

Chapter	Title	Content
		Stream, however, there will be no hydrological connection from the proposed two circuits to surface water bodies and downstream habitats; the Moneylane Stream will be under passed by HDD avoiding any potential effects on water quality as per the original submission.
7	Biodiversity; Flora and Fauna	Proposed modifications will not materially alter the identified impacts on biodiversity from those submitted as part of the original submission. The revised layout of Circuit B represents a reduction in development impact compared with the permitted layout, as it avoids the need for road openings, prevents the loss of approx. 100m <sup>2</sup> of non-native woodland, and eliminates the need to traverse land along two separate circuits. No effects on biodiversity are anticipated from the relocation of the dropdown masts as the affected area comprises agricultural land.
8	Air Quality and Climate	The mitigation measures remain unchanged from the original submission with the impact being slightly reduced as the relocation of the permitted Circuit b and alteration of permitted Circuit A reduce the number of highly sensitive residential properties with 20m of the Circuits from 8 to 7.
9	Noise and Vibration	The relocation of Circuit B and alteration Circuit A will reduce the number of sensitive receptors along the permitted Circuit B. The proposed changes will not materially alter the previously assessed noise impacts on the remaining receptors. The proposed changes will not generate increased noise and vibration during construction and operation and the previously envisaged construction methodologies, operations, and mitigation measures will remain unchanged from the original submission.
10	Landscape and Visual Impact Assessment	As the cables are underground, the proposed changes will not result in any landscape or visual impact. The slight relation of the masts will not result in any landscape or visual impacts. The effects will remain the same as in the original application.
11	Archaeological, Architectural and Cultural Heritage	The relocation of Circuit B will reduce potential impacts on any as-yet unknown sub-surface archaeological features. No additional mitigation measures are necessary beyond those already specified in the Archaeology Chapter of the original submission. The predicted effect on Archaeology, Architectural, and Cultural Heritage from the overall development remain unchanged.
12	Traffic and Transportation	The proposed new layout of Circuit B reduces the impact of the development on the R772 and associated traffic impacts, as it will no longer run beneath this road. No

**TABLE 5.1: TOPICS FROM ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIAR) FOR THE PERMITTED STRATEGIC INFRASTRUCTURE DEVELOPMENT**

Chapter	Title	Content
		impacts are anticipated during the operational phase as in the original planning application,
13	Material Assets	No additional mitigation measures beyond those already specified for the original application. The residual construction-phase effects remain consistent with the original submission and no impacts are anticipated during the operation phase.
14	Waste Management	The impacts and mitigation are as outlined in the EIAR submitted with the original planning application. There are no additional material asset impacts as a result of the proposed realignment.
15	Interactions	The AWN assessment concludes that there will be no additional impacts and some reduced impact associated with the proposed relocation of the permitted Circuit A, B, and two dropdown masts. It is anticipated that impacts from the interaction of the assessed environmental factors will remain unchanged and in line with the Environmental Impact Assessment Report (EIAR) prepared for the original submission.

### Conclusion of Assessment

- 5.17 Having regard to the above and the requirements of section 146B(4) of the 2000 Act it is considered that the extent and character of the alterations requested are such that the alterations, were they to be made, would be unlikely to have significant effects on the environment.
- 5.18 It is considered no new considerations arise in relation to impacts on the environment which were not considered in the assessment of impacts for the original SID application which was subject to a grant of permission by An Bord Pleanála.

### 6.0 APPROPRIATE ASSESSMENT

- 6.1 A Report for the Purposes of Appropriate Assessment Screening prepared by Moore Group accompanies this application, it concludes:
- 6.2 *It has been objectively concluded by Moore Group Environmental Services that:*
1. *The Proposed Development is not directly connected with, or necessary to the conservation management of the European sites considered in this assessment.*
  2. *The Proposed Development is not likely to either directly or indirectly significantly affect the Qualifying interests or Conservation Objectives of the European sites considered in this assessment.*
  3. *The Proposed Development, either alone or in combination with other plans or projects, is not likely to have significant effects on a European site.*
  4. *It is possible to conclude that significant effects can be excluded at the screening stage.*

*It can be excluded, on the basis of objective information, that the Proposed Development, individually or in combination with other plans or projects, will have a significant effect on*

*any European site, in the absence of any mitigation.*

*An appropriate assessment is not, therefore, required.*

## **7.0 SUMMARY AND CONCLUSIONS**

- 7.1 This Planning Report has been prepared to accompany a request to An Coimisiún Pleanála, pursuant to section 146B of the Planning & Development Act 2000 (as amended) for alterations to the Strategic Infrastructure Development permitted under ABP Reg Ref.: 315200-22 on the 30<sup>th</sup> of November 2023.
- 7.2 The proposed alterations relate to changes to the alignment of the permitted underground transmission lines, which will not have any visibility above ground, and which do not change the design or implementation of the permitted development materially.
- 7.3 As set out in this report and as demonstrated by the accompanying drawings and File Note prepared by CSEA, Environmental Note prepared by AWN Consulting and Report for the purposes of Appropriate Assessment Screening prepared by Moore Group, it is considered that the proposed alterations are not material and are unlikely to have any significant effect on the environment, given the limited nature, size and scale of alterations proposed, and the location of the proposed alterations.
- 7.4 It is submitted that none of the alterations sought introduce new or additional material planning or environmental considerations other than those already assessed under the extant permission.
- 7.5 We therefore respectfully request that the Commission decide that the making of the alterations subject of this request do not constitute the making of a material alteration of the terms of the development as granted permission under ABP Reg Ref.: 315200-22.
- 7.6 However, if the Commission decides that the proposed alterations are material, we wish to refer the Commission to Section 5 of this Planning and Report and the accompanying Environmental Report which sets out the main environmental issues in relation to the proposed alterations. The topics in the original Environmental Impact Assessment Report are reviewed in the context of the proposed alterations. It is considered that the proposed alterations could not reasonably be expected to have any significant effects on the environment.
- 7.7 In conclusion, it is respectfully submitted that the proposed alterations are not material and are consistent with the proper planning and sustainable development of the area. We would respectfully request that the Commission therefore proceed to alter the terms of the development consent for the permitted transmission line in accordance with the proposed alterations set out herein as illustrated in the accompanying drawings prepared by CSEA Consulting Engineers.