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

Date: 27th October 2026
Ref.: JN 24219

Re: Response to Fingal County Council Submission in respect of a planning application for a Strategic Infrastructure Development comprising a 680 MW Gas-Fired Generation Station at Kilshane Road, Kilshane, Finglas, Dublin 11

ACP Ref.: 324305-26

Dear Sir / Madam,

We, JSA Planning (the Agent), on behalf of Kilshane Energy Ltd. (the Applicant), Unit 8 CTEK, Riverside Road, Carrickmacross, Co. Monaghan, A81 XF29, hereby submit this response further to correspondence received from An Coimisiún Pleanála ('the Commission' hereafter) dated 29th September 2026, inviting the Applicant to respond to the submission made by Fingal County Council ('FCC' hereafter) in respect of the above-referenced Strategic Infrastructure Development application under the ACP Ref.: ACP-324305-26, for the construction of a 680 MW gas-fired generation station at Kilshane Road, Kilshane, Finglas, Dublin 11.

This response addresses the matters raised in the Council's report and is submitted in accordance with the Commission's invitation.

Introduction

The development was described as follows in the public notices submitted with the SID application:

"The Proposed Development is a Power Generation Station development and comprises 2 no. Open Cycle Gas Turbines, with an output of up to 340 Megawatts (MW) each, equating to a total output of up to 680MW, along associated ancillary structures, and services, including an Air Insulated Substation (AIS) adjacent to each of the turbines. The Proposed Development also includes the construction of a 400kV Gas Insulated Switchgear (GIS) substation. The proposed GIS substation will be connected to the national grid by way of a 400kV transmission line connection, which will be subject to a separate application.

The proposals will comprise the following:

- *Construction of 2 no. Gas Turbines, with an output of up to 340 Megawatts (MW) each, along with ancillary structures and auxiliary equipment associated with each of the two turbines (including gas turbine oil tank, rotor displacement system, natural gas system, hydraulic oil equipment, pneumatic system for blow-off valves, lube oil*

cooler, and fuel oil skid). Each of the turbines will have an exhaust stack with a height of c. 28m, with a height to the top of the evaporative cooler of c. 25.5m.

- *Adjacent to each of the turbines, the development will also comprise a single storey Packaged Electrical and Electronic Control Centre (PEECC) with a height of c. 6m and a gross floor area (GFA) of c. 321 sq.m.; fan cooler systems with a height of c. 4m; a single storey Continuous Emission Monitoring System (CEMS) Shelter with a height of c. 2.9m and GFA of c. 9 sq.m.; single storey gas heater structure with a height of c. 3.2m and GFA of c. 43 sq.m.; backup generator structure with a height of c. 3.2m and GFA of c. 30 sq.m.; compressor cleaning structure with a height of c. 3.7m and GFA of c. 11 sq.m.; transformer structure with a height of c. 3.2m and GFA of c. 9 sq.m.; and associated plant and equipment including a demineralised water tank with a height of c. 5.2m, C02 bottles, and an air dryer with a height of c. 1.9m.*
- *Adjacent to each of the gas turbines, the development includes an Air Insulated Substations (AIS) to house transformers and electrical equipment within fenced compounds.*
- *The proposed development will be bound to its northern and part of its eastern boundary by acoustic fencing (c. 12m in height).*
- *Construction of a 400kV GIS building (two storeys, with an overall height of c. 17m and a gross floor area of c. 907 sq.m.) and associated electrical equipment located to the northwest of the site, within a fenced compound.*
- *Provision of hard and soft landscaping works, tree planting and boundary treatments. Attenuation storage will be located to the southeast of the site, alongside the existing permitted attenuation storage.*
- *The proposals will be provided on two areas of stone surfacing. Access and services to connect to the adjacent permitted development. Additional planting is proposed across the site and all associated works. The development includes underground services, lighting, and associated site development and ancillary works, above and below ground, necessary to facilitate the development.*

An EPA-Industrial Emissions Directive (IE) licence will be applied for to facilitate the operation of the proposed development. An Environmental Impact Assessment Report ('EIAR') will be submitted with the application."

This response is submitted further to correspondence received from the Commission dated the 29th September 2026.

The Commission's correspondence stated that any response to the invitation must be received no later than 27th October 2026, being four weeks from the date of the Commission's letter. This response has been submitted in advance of that deadline.

A copy of the Commission's correspondence and the submission from Fingal County Council are included in **Appendix 1** for ease of reference.

This document provides a coordinated response to the main points raised within FCC's submission and includes input from the Applicant, and Waterman Moylan Consulting Engineers, RMDA Landscape Architects and AWN Consulting. The overall response has been coordinated by JSA Planning. The response solely and directly pertains to the matters raised in the submission of Fingal County Council and does not introduce any new environmental or planning considerations.

The following documents are appended to and should be read in conjunction with this response:

- **Appendix 1:** Correspondence received from An Coimisiún Pleanála dated 29th September 2026, including the Fingal County Council submission;

- **Appendix 2:** Construction Traffic Assessment Technical Note prepared by Waterman Moylan Consulting Engineers;
- **Appendix 3:** Landscape letter prepared by RMDA Landscape Architects;
- **Appendix 4:** Noise Technical Note prepared by AWN Consulting.

The applicant welcomes the report of Fingal County Council, and in particular the conclusion at section 3.3 of the report on the principle of the proposed development. Section 3.3 of the report states the following:

"The proposed development comprises 2 no. Gas Turbines with an output of 340MW together with ancillary structures and auxiliary equipment associated with each of the two turbines together with all associated development.

At national level, the NPF supports the transition to a carbon neutral and climate resilient society and to reduce greenhouse gas emissions by 51% and increase the share of electricity generated from renewable sources to 80% over the decade (2021- 2030). However, Government Policy as set out in the Policy Statement on Security of Electricity Supply states that 'the development of new conventional generation (including gas-fired and gasoil/distillate-fired generation) is a national priority and should be permitted and supported in order to ensure security of electricity supply and support the growth of renewable electricity generation'.

At regional level, the RSES as set out RPO 10.20 'Support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the Region and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this Strategy. This Includes the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity and gas transmission grid in a sustainable and timely manner subject to appropriate environmental assessment and the planning process'.

Noting recent government policy on electricity supply it is considered that the principle of the proposed development is supported and will align with a key target of the Climate Action Plan 2025 for the provision of at least 2 GW of new flexible gas plants by 2030.

At local level, the subject lands are zoned "HI" Heavy Industry with the objective to "provide for heavy industry". The proposed development is considered as a Utility installations' as defined in Appendix 7 - Technical Guidance of the Fingal Development Plan 2023 - 2029 as a 'structure composed of one or more pieces of equipment connected to or part of a structure and/ or a facility designed to provide a public utility service such as the provision of heat, electricity, telecommunications, water or sewage disposal and/or treatment/. Therefore, the principle of the proposed development would be acceptable in terms of the zoning objective."

The Fingal County Council report further concludes at section 3.4 that the development would be visually appropriate.

The Fingal County Council report goes on to set out several matters relating to Traffic and Transport, Noise, and Landscaping, which it states the Commission should satisfy themselves on. Conditions in relation to these matters are recommended, however it is considered appropriate to respond directly to these particular issues to provide clarification on the matters raised. Responses on these matters are set out below.

Response to Points Raised within the FCC Submission

Traffic and Transport:

FCC's Transportation Planning Section noted a slight difference between the construction traffic figures referenced within the Preliminary Construction Management Plan (PCMP) and those contained within the Traffic and Transport Assessment (TTA), and requested that the Applicant demonstrate that traffic associated with excavation works and the importation of construction materials had been appropriately accounted for within the construction traffic assessment.

In response, Waterman Moylan Consulting Engineers has prepared a Construction Traffic Assessment Technical Note, enclosed at **Appendix 2**. The Technical Note clarifies that the detailed Construction Traffic Assessment contained in Sections 6.1.1 and 7.2.1 of the TTA is the primary assessment of construction traffic associated with the proposed development. The construction traffic information contained in the PCMP was provided as a summary for reference and was not intended to replace the more detailed assessment contained in the TTA.

The Technical Note also confirms that the assessment accounts for traffic associated with excavation works, construction-material deliveries and the construction workforce. It is based on a preliminary excavation volume of 63,856 m³ and provides for up to 26 HGV arrivals and 26 HGV departures per day associated with earthworks, together with a further 10 two-way HGV movements per day for stone deliveries, large concrete pours and other construction activities. For the peak-hour assessment, up to five two-way HGV movements are assumed during the AM peak hour. The assessment also allows for a peak construction workforce of approximately 250 personnel, equating to approximately 200 car arrivals and 200 car departures per day, based on the assumed vehicle occupancy.

Based on the assumed construction traffic generation and distribution, the Technical Note predicts traffic increases of 3% in the AM peak and 4% in the PM peak at Junction 1, and 2% during both peak periods at Junction 2. As the predicted increases are below 5%, they are considered negligible and are not expected to result in any significant operational impact on the assessed junctions. Waterman Moylan therefore concludes that no further construction traffic assessment is necessary. The appointed contractor will prepare the final Construction Traffic Management Plan, taking account of the final construction methodology, available resources and the requirements of Fingal County Council, Transport Infrastructure Ireland and the other relevant statutory authorities.

Accordingly, the Technical Note clarifies the difference between the construction traffic figures presented in the PCMP and the TTA and confirms that traffic associated with excavation works, construction-material deliveries and workforce movements has been factored into the assessment of the two assessed junctions. The Technical Note therefore addresses the construction traffic matter raised in the Council's submission.

Landscape – Existing Trees and Hedgerows:

Fingal County Council requested the submission of an updated Arboricultural Method Statement and Tree Protection Plan by way of condition and recommended a number of conditions relating to the management, retention and protection of existing trees and hedgerows.

In response, RMDA Landscape Architects have provided a letter, enclosed as **Appendix 3**, confirming that the Applicant will comply with the relevant requirements set out in the Council's Chief Executive's Report, should planning permission be granted and subject to

the conditions attached to any such permission. The letter also confirms that no changes are proposed to the previously consented approach to the retention and protection of existing hedgerows on site, as reflected in the landscape documentation submitted with the current application.

Accordingly, the Applicant accepts the recommended requirements relating to existing trees and hedgerows, and the landscape approach presented in the current application remains consistent with the previously consented approach on the wider landholding. The proposed development doesn't result in any material change in terms of the nature of extent of tree or hedgerow removal on site. The proposed development under this SID application sits within the boundaries of an existing field, with the boundary hedgerows shown to be retained on the landscaping plans submitted with the application, so there is no hedgerow removal or removal of stands of trees required to facilitate the development. The proposed landscape plans also provide for the introduction of new tree planting within the site.

Noise:

Fingal County Council's Air and Noise Unit requested clarification regarding the plant items to be located within the proposed sound-insulated building and its acoustic performance; the background noise levels and nature of the assessed receptors; the operating scenarios and assessment periods considered in the EIAR; and the dimensions of the proposed acoustic barriers.

In response, AWN Consulting has prepared a Noise Technical Note, enclosed as **Appendix 4** of this letter. The Technical Note identifies the plant items that would operate within the sound-insulated building under the gas-fuel and liquid-fuel operating scenarios and confirms that the noise assessment assumes a building sound reduction of 20 dB. As the plant associated with liquid-fuel operation has higher noise emissions, the assessment adopts that scenario as the more conservative basis for assessing operational noise.

The Technical Note corrects the background noise ranges reported in Section 10.7.1 of the EIAR and confirms that plant noise may be audible at the surrounding noise-sensitive locations during lulls in intermittent road traffic and aircraft noise. It also confirms that receptor R01 is in commercial use, while the remaining modelled receptors are residential.

AWN further confirms that the plant may operate during both daytime and night-time periods and that the assessment applies the more stringent night-time criteria. Table 10-16 relates to Phase 2 operation only, while the updated cumulative assessment considers Phase 1 and Phase 2 together and predicts changes ranging from 0 and +2 dB, corresponding to "imperceptible" or "not significant" effects at the assessed receptors. The Technical Note also confirms that the acoustic barriers to the north of the northern and southern turbines were modelled at 130 m and 110 m in length, respectively, with both barriers having a height of 12 m.

Accordingly, the Technical Note provides the acoustic, monitoring, receptor, operating-scenario and barrier-dimension clarifications requested by the Council's Air and Noise Unit and therefore addresses the noise matters raised in the Council's submission. No significant impacts in relation to noise are predicted.

Conclusion

This response is submitted on behalf of the Applicant, Kilshane Energy Ltd., Unit 8 CTEK, Riverside Road, Carrickmacross, Co. Monaghan, A81 XF29, in response to the submission made by Fingal County Council in respect of the Strategic Infrastructure Development application for the proposed 680 MW gas-fired generation station at Kilshane Road, Kilshane, Finglas, Dublin 11, under ACP Ref.: ACP-324305-26.

The response, together with the accompanying technical notes and supporting documentation, addresses the matters raised in the Council's submission. We trust the Commission will afford the response set out herein due consideration in determining the application.

Should you require any queries or require any further information please do not hesitate to contact the undersigned.

Enclosures:

- **Appendix 1:** Correspondence received from An Coimisiún Pleanála dated 29th September 2026, including the Fingal County Council submission;
- **Appendix 2:** Construction Traffic Assessment Technical Note prepared by Waterman Moylan Consulting Engineers;
- **Appendix 3:** Landscape letter prepared by RMDA Landscape Architects;
- **Appendix 4:** Noise Technical Note prepared by AWN Consulting.

Yours sincerely,

JSA Planning

JSA Planning

Appendix 1: Correspondence received from An Coimisiún Pleanála dated 29th September 2026, including the Fingal County Council submission

Our Case Number: ACP-324305-26

Your Reference: Kilshane Energy Limited

An Coimisiún Pleanála

JSA Planning
39 Fitzwilliam Place
Dublin 2
D02ND61



Date: 29 September 2026

Re: Proposed development of a 680MW Gas-Fired Generation Station
at Kilshane Road, Kilshane, Finglas, Dublin 11 (www.kilshanephase2sid.com)

Dear Sir / Madam,

I have been asked by An Coimisiún Pleanála to refer further to the above mentioned case.

A submission from Fingal County Council has been received by the Commission in relation to the above mentioned case. This submission is available for inspection on the Commission's website at the following link: https://www.pleanala.ie/en-ie/case/324305.

The Commission hereby considers it appropriate to invite you to make a submission on the observations received in relation to the application. Please be advised that any response to the Commission's invitation should not contain any additional reports or supplementary reports and should be confined to the issues raised in the observations received by the Commission. Any submission in relation to the above must be received by the Commission within 4 weeks from the date of this letter (i.e. not later than the 27th of October 2026).

If you have any queries in relation to the matter please contact the undersigned officer of the Commission.

Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

PP dWS

Ellen Moss
Executive Officer
Direct Line: 01-8737285

PA08

Teil **Tel** (01) 858 8100
Glao Áitiúil **LoCall** 1800 275 175
Láithreán Gréasáin **Website** www.pleanala.ie
Ríomhphost **Email** communications@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

RECEIVED
30 SEP 2024

Outlook

FW: Our Ref:- SID/01/26 Your Ref:- ACP-324305-26

From Communications <communications@pleanala.ie>
Date Thu 9/17/2026 12:46 PM
To Marine <marine@pleanala.ie>

1 attachment (3 MB)
SID 01 26 FCC Response 17-09-2026.pdf;

From: Planning Appeals <planningappeals@fingal.ie>
Sent: Thursday 17 September 2026 12:26
To: Appeals2 <appeals@pleanala.ie>; Communications <communications@pleanala.ie>
Cc: Darija Balciunaite <Darija.Balciunaite@fingal.ie>
Subject: Our Ref:- SID/01/26 Your Ref:- ACP-324305-26

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Dear Sir/Madam,

Please find attached response to correspondence received in respect of the above application.

Yours faithfully,

Abhilash Nair I Clerical Officer
An Roinn Pleanála agus Forbatha | Planning & Development Department
Comhairle Contae Fhine Gall, Áras an Chontae, Sórd, Baile Átha Cliath, K67 X8Y2
Fingal County Council, County Hall, Main Street, Swords, Co. Dublin, K67 X8Y2

Comhairle Contae Fhine Gall
Fingal County Council

An Roinn Pleanála agus Forbartha
Planning and Development Department

This email and any files transmitted with it are confidential and may be legally privileged. It is intended solely for the addressee. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on it, is prohibited and may be unlawful. Internet communications cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete. Therefore, we do not accept responsibility for any errors or omissions that are present in this message, or any attachment, that have arisen as a result of e-mail transmission. This message has been swept by Anti-Virus software.

Tá an ríomhphost seo agus aon chomhad a ghabhann leis faoi rún agus d'fhéadfadh sé a bheith faoi phribhléid dhlíthliúil. Is ar an seolaí amháin atá sé dírithe. Mura tú an faighteoir beartaithe, tá cosc ar aon nochtadh, cóipeáil, dáileadh, nó aon ghníomh a dhéanamh nó a fhágáil ar lár i dtaca leis an ríomhphost agus d'fhéadfadh sin a bheith mídhleathach. Ní féidir cumarsáid idirlín a ráthú a bheith slán nó saor ó earráidí mar d'fhéadfadh faisnéis a bheith

idircheaptha, truaillithe, caillte, scriosta, nó teacht déanach nó neamhiomlán. Dá bhrí sin, ní féidir linn glacadh le freagracht as aon earráidí nó easnaimh atá sa teachtaireacht seo, nó aon iatán, a tháinig chun cinn mar thoradh ar an tarchur ríomhphoist. Tá an teachtaireacht cuardaithe ag bogearraí Frithvíreas.

Comhairle Contae Fhine Gall
Fingal County Council

An Roinn um Pleanáil agus Infrastruchtúr Straitéiseach
Planning and Strategic Infrastructure Department

The Secretary,
An Coimisiún Pleanála,
4 Marlborough Street,
Dublin 1.

Our Ref. SID/01/26
Your Ref. ACP-324305-26
16th September, 2026

Chief Executive's Report

Strategic Infrastructure Development at Kilshane Road, Kilshane, Finglas, Dublin 11

Contents

Section 1 Background 4
1.1 Introduction 4
1.2 Procedural Background 5
1.3 Proposed Development 8
1.4 Site Description and Surrounding Area 9
1.5 Relevant Planning History 9
Section 2 Policy Context 15
2.1 Introduction 15
2.2 National Planning Framework First Revision (NPF) First Revision – April 2025 15
2.4 Climate Action Plan 2025 16
2.5 Energy Security in Ireland 2030 16
2.6 Circular PL 12/2021 – Government Statement on Security of Electricity Supply 16
2.7 Policy Statement on Security of Electricity Supply 16
2.8 Fingal County Development Plan 2023 – 2029 17
Section 3 Introduction 19
3. Planning Issues 19
3.1 Internal Reports 19
3.2 Report of Council Meeting 19
3.3 Principle of Development 20
3.4 Design and Visual Impact 20
3.5 Impact on the Amenity of the Area 21
3.6 Landscape 22
3.7 Built Heritage 23
3.8 Access and Transportation 24
3.9 Services and Drainage 25
3.10 Dublin Airport 26
3.11 Waste 27
3.12 Public Lighting 27

3.13 Environmental Impact Assessment & Appropriate Assessment 27
3.14 Section 48/49 Development Contribution Schemes 27
3.15 Special Contribution Conditions 28
Section 4 Conclusion and Recommendations 29
4.1 Chief Executive Recommendation 29
4.2 Recommended Conditions 29
Appendix 1 – Consultee Reports 36
Water Services 36
Transportation Planning Section 38
Parks and Green Infrastructure Division 43
Public Lighting 45
Heritage Officer 47
Environment (Waste) 49
Air and Noise Unit 50

Section 1 Background

1.1 Introduction

Kilshane Energy Ltd have submitted a planning application in respect of a proposal within the townland of Kilshane, located to the west of the N2 at Kilshane Road, Kilshane, Finglas, Dublin 11.

The proposed development is described as follows:

The site is located to the south of Kilshane Road and the site of a permitted peaking power generation station permitted under FCC Reg. Ref.: FW22A/0204 and ABP Ref.: 317480-23 as amended by FCC Reg. Ref.: FW25A/0523E, and adjacent to the site of a permitted 220kV Gas Insulated Switchgear substation permitted under ACP Ref.: 314894-22. The site is to the west of the M2 motorway, to the north of Roadstone Huntstown Quarry, and to the east of agricultural lands and Northwest Logistics Park.

The Proposed Development is a Power Generation Station development and comprises 2 no. Open Cycle Gas Turbines, with an output of up to 340 Megawatts (MW) each, equating to a total output of up to 680MW, along associated ancillary structures, and services, including an Air Insulated Substation (AIS) adjacent to each of the turbines. The Proposed Development also includes the construction of a 400kV Gas Insulated Switchgear (GIS) substation. The proposed GIS substation will be connected to the national grid by way of a 400kV transmission line connection, which will be subject to a separate application.

The proposals will comprise the following:

- *Construction of 2 no. Gas Turbines, with an output of up to 340 Megawatts (MW) each, along with ancillary structures and auxiliary equipment associated with each of the two turbines (including gas turbine oil tank, rotor displacement system, natural gas system, hydraulic oil equipment, pneumatic system for blow-off valves, lube oil cooler, and fuel oil skid). Each of the turbines will have an exhaust stack with a height of c. 28m, with a height to the top of the evaporative cooler of c. 25.5m.*

- *Adjacent to each of the turbines, the development will also comprise a single storey Packaged Electrical and Electronic Control Centre (PEECC) with a height of c. 6m and a gross floor area (GFA) of c. 321 sq.m.; fan cooler systems with a height of c. 4m; a single storey Continuous Emission Monitoring System (CEMS) Shelter with a height of c. 2.9m and GFA of c. 9 sq.m.; single storey gas heater structure with a height of c. 3.2m and GFA of c. 43 sq.m.; backup generator structure with a height of c. 3.2m and GFA of c. 30 sq.m.; compressor cleaning structure with a height of c. 3.7m and GFA of c. 11 sq.m.; transformer structure with a height of c. 3.2m and GFA of c. 9 sq.m.; and*

associated plant and equipment including a demineralised water tank with a height of c. 5.2m, C02 bottles, and an air dryer with a height of c. 1.9m.

- *Adjacent to each of the gas turbines, the development includes an Air Insulated Substations (AIS) to house transformers and electrical equipment within fenced compounds.*

- *The proposed development will be bound to its northern and part of its eastern boundary by acoustic fencing (c. 12m in height).*

- *Construction of a 400kV GIS building (two storeys, with an overall height of c. 17m and a gross floor area of c. 907 sq.m.) and associated electrical equipment located to the northwest of the site, within a fenced compound.*

- *Provision of hard and soft landscaping works, tree planting and boundary treatments. Attenuation storage will be located to the southeast of the site, alongside the existing permitted attenuation storage.*

- *The proposals will be provided on two areas of stone surfacing. Access and services to connect to the adjacent permitted development. Additional planting is proposed across the site and all associated works. The development includes underground services, lighting, and associated site development and ancillary works, above and below ground, necessary to facilitate the development.*

An EPA-Industrial Emissions Directive (IE) licence will be applied for to facilitate the operation of the proposed development.

An Environmental Impact Assessment Report ('EIAR') have been prepared with respect of the proposed development.

Fingal County Council hereby sets out the submission of the Planning Authority on the proposed Strategic Infrastructure Development.

An Coimisiún Pleanála, as the competent authority will decide to grant or refuse this Strategic Infrastructure Development application.

1.2 Procedural Background

The application has been lodged with An Coimisiún Pleanála under Section 37E of the Planning and Development Act 2000, as amended. This states:

(1) An application for permission for development in respect of which a notice has been served under section 37B(4)(a) shall be made to the Board and shall be accompanied

by an environmental impact assessment report in respect of the proposed development.

(2) The Board may refuse to deal with any application made to it under this section where it considers that the application for permission or the environmental impact assessment report is inadequate or incomplete, having regard in particular to the permission regulations and any regulations made under section 177 or to any consultations held under section 37B.

The proposed development comprises 2 no. Gas Turbine Power Generation Stations, with an output of up to 340 Megawatts (MW) each, equating to a total output of up to 680MW, along associated ancillary structures, and services, including an Air Insulated Substation (AIS) adjacent to each of the turbines. The Proposed Development also includes the construction of a 400kV Gas Insulated Switchgear (GIS) substation to serve the two Generation Stations. The proposed GIS substation will be connected to the national grid by way of a 400kV transmission line connection, which will be subject to a separate application.

The Planning Report submitted with the application sets out an overview of the proposal noting that the proposed development comprises a Gas Turbine Power Generation Station, described as a Flexible Peaking Plant that can quickly dispatch power to balance fluctuating electricity demand in the grid due to intermittent renewable supplies.

It is stated that the proposed development is also used to provide a reliable source of backup generation for operating in times of high electricity demand and low renewable electricity supply noting that these peaking plants are crucial to avoid power outages and to ensure the security of electricity supply in a grid with increased renewable sources of energy.

Section 1.2 of the Planning Report submitted sets out the SID Pre-application Determination. In this regard it is noted that the applicant engaged in consultations with An Coimisiún Pleanála who considered that the proposed development constitutes development that fell within the relevant definition of energy infrastructure in the Seventh Schedule of the Planning & Development Act, 2000 (as amended), thereby satisfying the requirements set out in section 37A(1) of the Act.

An Coimisiún Pleanála was of the opinion that the proposed development constitutes a strategic infrastructure development within the meaning of section 37A of the Act and an application for permission for the proposed development must therefore be made directly to An Coimisiún Pleanála under section 37E of the Planning & Development Act, 2000 (as amended).

An Coimisiún Pleanála also confirmed that the proposed development falls within two of the three paragraphs under section 37A(2) of the Planning and Development Act 2000 (as amended) and given that the application significantly exceeds one of the thresholds under the Seventh Schedule, it is considered that the proposed development constitutes a SID.

In correspondence received from An Coimisiún Pleanála, Fingal County Council is required under Section 37E(4) of the Planning and Development Act 2000, as amended, to submit to the Commission a report setting out the views of the authority on the effects of the proposed development on the environment and the proper planning and sustainable development of the area of the authority within a period of 10 weeks from the making of the application to the Commission.

In addition to the information required to be submitted with this report by the provisions of section 37E(47), Fingal Council is requested to address, where relevant, all of the issues identified at section 7 of the "Guidelines for Planning Authorities" in respect of section 37A of the Act such as:

- Main relevant Development Plan provisions relating to the subject site and surrounding area including the relevant Core Strategy provisions. A clear indication of the current status of the relevant Development Plan and any Draft Plans should be given, together with any relevant issues arising.
- Details of other relevant Plan provisions (e.g. Local Area Plans) and statement regarding status of these Plans (adopted or in draft form).
- Relevant planning history relating to the subject site and the surrounding area.
- Relevant enforcement information relating to the subject site.
- Relevant national, regional and local policies.
- Any SAAO which may be affected by the proposed development.
- European designations, Natural Heritage Areas, which may be affected by the proposed development (whether in or proximate to same).
- Protected Structures, ACA's etc.
- Waste policy, which may be relevant to the proposed development. This will arise particularly in the case of applications for waste facilities where policies, objectives and other provisions of Regional Waste Management Plans should be referred to in addition to the Development Plan.
- Adequacy of the public water supply. (Note Irish Water may also comment as a prescribed body)
- Public sewerage facilities and capacity to facilitate the proposed development. (Note Irish Water may also comment as a prescribed body)
- Availability and capacity of public surface water drainage facilities.
- Flood risk assessment in accordance with The Planning System and Flood Risk Management - Guidelines for Planning Authorities (November 2009).

- Assessment under the Water Framework Directive and associated regulations.
- Hydrological and hydrogeological assessments as relevant to the case.
- Appropriate assessment under the Habitats Directive.
- Comments on the adequacy, methodology adopted, conclusions etc. of the EIAR submitted with the application.
- Assessment of landscape status and visual impact, as appropriate.
- Carrying capacity and safety of road network serving the proposed development.
- Environmental carrying capacity of the subject site and surrounding area, and the likely significant impact arising from the proposed development, if carried out.
- Description of any public use of adjoining, abutting or adjacent lands in the applicant's ownership, and the planning authority's view on any condition which may be appropriate for the purpose of conserving a public amenity on those lands.
- Planning authority view in relation to the decision to be made by the Board.
- Planning authority view on conditions which should be attached in the event of the Board deciding to grant permission. (Where an IPPC or Waste licence is required, the Board cannot impose conditions relating to the control of emissions from the activity for which a license is required).
- Planning authority view on community gain conditions which may be appropriate.
- Details of relevant section 48/49 development contribution scheme conditions which should be attached in the event of a grant.
- Details of any special contribution conditions which should be attached in the event of a grant along with detailed calculations and justification for the conditions.
- Any other matters relating to the effects on the environment, the proper planning and sustainable development of the area or the effects on European site(s) that the planning authority may consider to be relevant to the case.

1.3 Proposed Development

The proposal comprises the following main components:

(a) The construction of 2 no. Gas Turbines (each with an output of 340MW) together with ancillary structures and auxiliary equipment associated with each of the two turbines.

(b) An acoustic fence (c. 12m in height) along the northern and part of the eastern boundary.

(c) The construction of 400kV GIS building (two storeys, with an overall height of c. 17m and a gross floor area of c. 907 sq.m.) and associated electrical equipment located to the northwest of the site, within a fenced compound.

(d) Provision of hard and soft landscaping works, tree planting and boundary treatments. Attenuation storage will be located to the southeast of the site, alongside the existing permitted attenuation storage.

(e) The proposals will be provided on two areas of stone surfacing. Access and services to connect to the adjacent permitted development. Additional planting

is proposed across the site and all associated works. The development includes underground services, lighting, and associated site development and ancillary works, above and below ground, necessary to facilitate the development.

1.4 Site Description and Surrounding Area

The subject site is located within the townland of Kilshane, located to the south and west of the N2 at Kilshane Road, Kilshane, Finglas, Dublin 11.

The site is located to the south of Kilshane Road and the site of a permitted peaking power generation station permitted under Reg. Ref. FW22A/0204 / ABP Ref.: 317480-23 as amended by Reg. Ref. FW25A/0523E, and adjacent to the site of a permitted 220kV Gas Insulated Switchgear substation permitted under ACP Ref.: 314894-22. The site is to the west of the M2 motorway, to the north of Roadstone Huntstown Quarry, and to the east of agricultural lands and Northwest Logistics Park

The site currently comprises greenfield lands which are bound by existing hedgerows. The wider area surrounding the site comprises lands which are characterised by greenfield lands and existing industrial / logistics / warehouse development.

The closest area of residential development known as Hollywoodrath is located c. 2km west of the subject site, Blanchardstown Town Centre is located c. 4.6km northeast of the site and Charlestown (retail) is located c. 2.5km from the site.

1.5 Relevant Planning History

Subject site

FW25A/0523E - GRANT PERMISSION

Kilshane Energy Ltd. applied for planning permission for revisions to previously approved Gas Turbine Power Generation Station (Reg. Ref: FW22A/0204) at a site located at Kilshane Road, Kilshane, Finglas, Dublin 11, comprising the following amendments:

1. Revisions to previously approved administrative/warehouse building consisting of the following: (a) Revised internal layout consisting of addition of new stair core and lift at ground floor level connecting to new storage area at first floor level (428 m2 GFA), increasing the total GFA of the administrative/warehouse building from 855 m2 to 1283 m2. (b) Revised façade design to elevations including revised fenestration to south elevation, revised fenestration and door design to west elevation, revised fenestration to east elevation and provision of new external fire staircase and first floor level access door to east elevation. (c) Increase in height of administrative/warehouse building by 1 m to 7.38 m. (d) Revised colour of material finish from green to dark grey.

2. Revisions to previously approved gas turbine including revised shape of evaporative cooler, addition of servicing gantries and the slight moving of the gas turbine c. 5.57 m to the north as demonstrated on the enclosed architectural plans (Drg No. Drawing No. 25043-PL-04.1) Internal gas turbine machinery and installation as part of revised gas turbine model to be provided to later specialist design as previously approved under Reg. Ref. FW22A/0204.
3. Revised size and location of fin fan coolers within power island compound as demonstrated on enclosed architectural plans.
4. Revisions to layout of diesel storage compound to now provide 1 no. larger fuel storage tank with an increase in maximum height from 16.2 m to 20 m and an increase in diameter from 24.4 m to 49 m.
5. Revised design and location of the Packaged Electronic/Electrical Control Compartment (PEECC) within the power island compound to now comprise a single storey stilted building raised 2.6 m above ground level, accessed via 2 no. external stairs and a new servicing gantry at finished floor level, with a floor-to-ceiling height of 3.25 m and an overall height of 6 m, and an increase in GFA from 72 m^2 to 148.51 m^2 together with façade changes.
6. Revised design and location of BOP Power Distribution Centre within power island compound as demonstrated on enclosed architectural drawings including increase in GFA from 129 m2 to 160.6 m2 together with façade changes including revised fenestration to west and east elevations.
7. The addition of new Aux Equipment Block (connected to the Gas Turbine) with a GFA of 361.20 m2 and height ranging from 7.65m to 9.59m and new servicing gantries for the purposes of sheltering specialist equipment and machinery as identified on the enclosed architectural drawings.
8. The addition of a HVAC Structure within power island compound with a maximum height of 8.84 m which supports two HVAC units on the top and the Starter Transformer and Excitation Transformer below.
9. Revision to previously approved Acoustic Wall within power island compound consisting of a slight decrease in length from 107.0m to 101.6m.
10. Removal of previously approved 16.2m high x 18.3m dia Demin Water Tank and replaced with Separate Demin Water Tank to be added as a non-permanent structure rather a small cube refill tank.
11. Removal and replacement of select number of smaller equipment items as identified on the equipment identification drawings prepared by CWPA Planning & Architecture (Drawing No. 25043-PL-14).
12. Minor revision to internal road network as demonstrated on enclosed architectural drawings to accommodate proposed amendments.

FW22A/0204 / ABB- 317480-23 - GRANT PERMISSION

The proposed development comprised the following:

1. The construction of a new Gas Turbine Power Generation Station with an output of up to 293 Megawatts. The proposed station will consist of 1 no. Gas Turbine and 1 no. 28 m high Exhaust Stack partially enclosed by a 12 m high acoustic wall. 1 no. single storey Admin Building and Warehouse (c. 926 m2), 1 no. single storey Packaged Electronic/Electrical Control Compartment (PEECC) (c. 72 m2), 1 no. single storey Continuous Emission Monitoring System (CEMS) Shelter (c. 14.8 m2), 1 no. 16.2m high x 024.4m Fuel Oil Tank, 1 no. 15.3m high x 09.2m Raw/Fire Water Tank, 1 no. 16.2m high x 018.3m Demin Water Tank, and miscellaneous plant equipment.
2. The demolition of a detached residential dwelling (c. 142 m2 GFA) and associated farm buildings (c. 427 m2 GFA) located in the northwest corner of the subject site to facilitate the proposed development.
3. Road improvement works to 493.34 m Kilshane Road (L3120), including the realignment of a portion of the road (293.86 m) within the subject site boundary and the provision of new footpaths, off-road cycle ways, together with the construction of a new roundabout linking the proposed realignment of Kilshane Road back to the existing road network to the northeast of the subject site and to the proposed internal road network to serve the proposed development.
4. The construction of entrance gates, low wall and railings fronting the realigned Kilshane Road and a private internal road network providing for vehicular, cyclist and pedestrian access to serve the development. Construction of 3 m high security fencing within development.
5. Total provision of 26 no. car parking spaces including 1 no. disabled persons parking space and 2 no. EV electrical charging points.
6. Provision of security lighting columns to serve the development and the installation of Closed-Circuit Television System (CCTV) for surveillance and security purposes.
7. Provision of 20 no. sheltered bicycle parking spaces.
8. Provision of hard and soft landscaping works, tree planting and boundary treatments including 3 m high security fence along Kilshane Road and the perimeter of the subject site boundary.
9. Provision of new on-site foul sewer pumping station to serve the development.
10. Provision of underground surface water attenuation areas to serve the development.

All associated site development and excavation work, above and below ground, necessary to facilitate the development.

An Environmental Impact Assessment Report was prepared in respect of the proposed development. This application relates to a development that will require an Industrial Emissions Directive licence from the Environmental Protection Agency. A subsequent application will be submitted for an Above Ground Installation (AGI) compound,

underground gas supply installation and a subsequent Strategic Infrastructure Development (SID) Application will also be submitted for a Gas-Insulated Switchgear Substation (GIS), Air Insulated Switchgear Substation (AIS) and grid connection to serve the development.

FW21A/0250 - REFUSE PERMISSION

Planning permission was sought for a development that will consist of the following;

1. The construction of a Gas Turbine Power Generation Station with an output of up to 293 Megawatts. The proposed station will consist of 1 no. Gas Turbine, 1 no. 28m high Exhaust Stack, 1 no. 2 story Admin Building (c. 680 m2), 1 no. single storey Workshop (c. 661 m2), 1 no. single storey Plant Room Building (c. 608 m2), 1 no. single storey Dew Point Heater Boiler Building (c. 52 m2), 1 no. single storey Electrical Module for Fuel Gas Area Building (c. 45 m2), 1 no. single storey Packaged Electronic Electrical Control Compartment building (PEECC) (c. 150 m2), 1 no. single storey E0Room Building (c. 227 m2), 1 no. single storey Fuel Gas Block Building (152 m2), 1 no. single storey Continuous Emission Monitoring System (CEMS) Building (c. 9 m2), 1 no. single storey Fuel Oil Treatment & Forwarding Building (c.59 m2), an Above Ground Installation (AG() area consisting of 1 no. single storey Instrument Building (c. 28.5 m2), 1 no. single storey Regulator Building (47 m2), 1 no. single store Boiler Building (c. 28 m2), and 1 no. single storey Analyser Kiosk (6 m2), 2 no . 20 m high diesel storage tanks and recessed bund area, 1 no. 17 m high Raw and Fire Fighting Water Tank, miscellaneous plant and equipment.
2) The realignment of a portion (263 m) of the Kilshane Road within the subject site boundary, including the provision of new footpaths and off0road cycle ways, together with the construction of a new roundabout linking the proposed realignment of Kilshane Road back to the existing road network to the north west of the subject site and to the proposed internal road network to serve the proposed development.
3) The construction of Entrance Gates, 1 no. single storey security office (40 m2 GFA) and a private internal road network providing for vehicular, cyclist and pedestrian access to serve the development.
4) Total provision of 20 no. Car Parking Spaces including 2 no. disabled parking spaces and 4 no. Electrical Charging Points.
5) Provision of lighting columns to serve the development and the installation of Closed-Circuit Television System (CCTV) for surveillance and security purposes.
6) Provision of 20 no. Sheltered Bicycle Parking Spaces.
7) Provision of hard and soft landscaping works, tree planting and boundary treatments.
8) Construction of a Wastewater Treatment Plant and Percolation Area together with a Surface Water Attenuation Area to serve the development.
9) All associated site works necessary to facilitate the development.

Refusal Reasons

1. *Insufficient information has been submitted to enable the Planning Authority to complete an Appropriate Assessment. The Planning Authority is not satisfied that the proposed development, individually or in combination with other plans or projects would not adversely affect the integrity of a Natura 2000 site and special conservative interests. The proposed development is therefore contrary to the proper planning and sustainable development of the area.*
2. *Insufficient information has been submitted to enable the Planning Authority to ascertain if the proposed development would require Environmental Impact Assessment in accordance with 172(a) of the Planning and Development Act 2000, as amended or is likely to have a significant effect on the environment within the context of Section 172(b) of the Planning and Development Act 2000, as amended. The proposed development is therefore contrary to the proper planning and sustainable development of the area.*
3. *Based on the information submitted, the Planning Authority is not satisfied that the proposed development would not endanger or interfere with the safety of aircraft or the safe and efficient navigation thereof. The proposed development materially contravene objective DA10 of the Fingal County Development Plan 2017-2023 and would therefore be contrary to the proper planning and sustainable development of the area.*
4. *In the absence of clear information regarding the impacts of the proposed development and mitigation measures to address these, the proposed development could adversely affect the amenities of adjoining properties and depreciate the value of same. The proposed development would therefore be contrary to the proper planning and sustainable development of the area.*
5. *Having regard to the limited nature of information submitted with the planning application, the Planning Authority is not satisfied that the proposed development would not give rise to adverse impacts on the green infrastructure, biodiversity, ecology, archaeology, landscape character and the visual amenities of the area. The proposed development would materially contravene Objectives NH27, GI22, NH20, CH05 and CH06 of the Fingal County Development Plan 2017-2023, would set a poor precedent for other similar development and would therefore be contrary to the proper planning and sustainable development of the area.*
6. *Having regard to the limited nature of information submitted with the planning application, the Planning Authority is not satisfied that the proposed development would not give rise to adverse impacts on the green infrastructure, biodiversity, ecology, archaeology, landscape character and the visual amenities of the area. The proposed development would materially contravene Objectives NH27, GI22, NH20, CH05 and CH06 of the Fingal County Development Plan 2017-2023, would set a poor precedent for other similar development and would therefore be contrary to the proper planning and sustainable development of the area.*

Development in the surrounding area

FW23A/0232 – Application withdrawn before a decision was made

The development will consist of the following works:

- The construction of new Gas Fired open cycle Turbine Power Generation Station with an output of up to 291 Megawatts. The proposed station will consist of 8 no. Gas Turbines and 8 no. 18 m high exhaust stacks, 1 no. AIS Substation and associated lighting column, 1 no. single storey Packaged Electronic /Electrical Control Compartment, 1 no. single storey continuous Emission Monitoring System Shelter, Associated Fin Fan Collars, 1 no. Storage and Warehouse building, 1 no. fuel oil storage tank, 1 no. demineralised water storage tank, 1 no. raw/fire water storage tank, 1 no. fire pump house, 2 no. demineralised water treatment trailers.
- The construction of an internal road network providing for access to serve the development.
- Provision of hard and soft landscaping works, tree planting and boundary treatments including parking perimeter fencing.

ABP – 314894 - 22 (SID/01/20) – Approve with conditions

Proposed development of a 220kV Gas Insulated Switchgear (GIS) substation on lands at Kilshane Road, and an underground 220kV transmission line connection to the existing Cruiserath 220kV substation.

Section 2 Policy Context

2.1 Introduction

This section outlines the planning policy context for the proposed development including reference to relevant policy at national, regional and local level.

2.2 National Planning Framework First Revision (NPF) First Revision – April 2025

The following national policy objectives (NPO) are of relevance to the proposed development:

NPO 61

In co-operation with relevant Departments in Northern Ireland, strengthen all-island energy infrastructure and interconnection capacity, including distribution and transmission networks to enhance security of electricity supply, and explore the potential for strategic cooperation on offshore wind energy development.

NPO 69

Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions as expressed in the most recently adopted carbon budgets.

NPO 70

Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a climate neutral economy by 2050.

NPO 71

Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development.

2.3 Eastern and Midlands Regional Spatial and Economic Strategy (RSES) 2019-2031

The following regional policy objectives (RPO) are of relevance to the proposed development:

RPO 10.20:

Support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the Region and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this Strategy. This Includes the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity and gas transmission grid in a sustainable and timely manner subject to appropriate environmental assessment and the planning process.

2.4 Climate Action Plan 2025

Climate Action Plan 2025 (CAP25) is the third statutory annual update to Ireland's Climate Action Plan under the Climate Action and Low Carbon Development (Amendment) Act 2021. The Plan lays out a roadmap of actions to meet national climate objective of pursuing and achieving, by no later than the end of the year 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy. It aligns with the legally binding economy-wide carbon budgets and sectoral emissions ceilings that were agreed by Government in July 2022.

The following key targets are of relevance to the proposed development:

Key Targets

- New Flexible Gas Plant – at least 2 GW by 2030

2.5 Energy Security in Ireland 2030

This report sets out government policy and the importance of providing dependable and flexible electricity supply. The report notes inter alia in relation to Irelands energy security plans of the electricity system to be focused on *'the addition of renewable generation, demand-side flexibility, new gas-fired generation as flexible back-up, interconnection and storage, are the right ones to secure our electricity supplies.'*

2.6 Circular PL 12/2021 – Government Statement on Security of Electricity Supply

The Circular provided advice to Planning Authorities that where planning applications are submitted for electricity infrastructure or infrastructure that may impact on electricity supply – including for existing conventional electricity generation – that they should, until further notice, be considered having regard to the Policy Statement on Security of Electricity Supply.

2.7 Policy Statement on Security of Electricity Supply

Published in November 2021, this policy statement includes explicit Government approval that:

- the development of new conventional generation (including gas-fired and gasoil/distillate-fired generation) is a national priority and should be permitted and supported in order to ensure security of electricity supply and support the growth of renewable electricity generation
- it is appropriate that existing conventional electricity generation capacity should be retained until the new conventional electricity generation capacity is developed in order to ensure security of electricity supply
- the connection of large energy users to the electricity grid should take into account the potential impact on security of electricity supply and on the need to decarbonise the electricity grid
- it is appropriate for additional electricity transmission and distribution grid infrastructure, electricity interconnection and electricity storage to be permitted and developed in order to support the growth of renewable energy and to support security of electricity supply

- it is appropriate for additional natural gas transmission and distribution grid infrastructure to be permitted and developed in order to support security of electricity supply

2.8 Fingal County Development Plan 2023 – 2029

Zoning Objective:

The subject site is zoned as "HI" Heavy Industry within the Fingal Development Plan 2023-2029 which has the objective to *"provide for heavy industry"* with the vision to *"facilitate opportunities for industrial uses, activities and processes which may give rise to land use conflict if located within other zonings. Such uses, activities and processes would be likely to produce adverse impacts, for example by way of noise, dust or visual impacts. HI areas provide suitable and accessible locations specifically for heavy industry and shall be reserved solely for such uses".*

- Landscape Character Types: River Valleys/ Canal
- Specific Objective Development Boundary: Blanchardstown
- Specific Objective Framework Plan: Dublin Enterprise Zone
- Dublin Airport Zone: Zone A & B
- Dublin Airport: Outer Public Safety Zone

The following policy is relevant to development of this type:

- Policy EEP3 Maximising Fingal's Economic Potential
- Policy EEP4 Employment Intensive Land Uses
- Policy EEP5 Land Extensive Uses
- Objective EEO4 Space Extensive Uses
- Policy EEP8 Promoting Major Urban Centres
- Policy EEP9 Fingal as An Engine for Economic Growth
- Objective EEO8 Dublin Enterprise Zone
- Objective EEO11Economic Growth of Metropolitan Area
- Objective EEO12 Supporting Existing Clusters
- Objective EEO35 Range of Industrial/Manufacturing Units
- Objective EEO36 Needs of Enterprises and Bespoke Building Facilities
- Objective EEO37 Development Standards for Industrial/Manufacturing Buildings
- Objective EEO20 Regeneration of Business Parks and Industrial Estates
- Objective DMSO5 Design Statement
- Policy EEP20 Manufacturing
- Section 14.15 Enterprise & Employment
- Section 14.15.1 Business Parks and Industrial Areas
- Objective DMSO89 Design and Siting of Business Parks and Industrial Areas
- Table 14.15: Design Guidelines for Business Parks, Industrial Areas (Enterprise and Employment lands)
- Section 14.20.20 Control of Major Accident Hazards Directive (Seveso Directive)
- Section 14.20.21 Major Accidents – Seveso Sites
- Table 14.27: List of Seveso / COMAH Sites
- Section 11.6.1 Control of Major Accident Hazards Directive (Seveso Directive)

- Policy IUP26 COMAH Establishments/ SEVESO
- Objective IUO37 Restrictions on Development in proximity of a Seveso Site
- Objective IUO39 Extensions to Seveso Sites
- Objective IUO40 Adjacent Uses – Seveso Sites
- Objective IUO41 Storage of Seveso Substances
- Objective IUO42 HAS Consultation Distances for new Seveso Sites
- Objective IUO44 Energy Utilities
- Table 14.17: Bicycle Parking Standards
- Table 14.18: Car Parking Zones
- Table 14.19: Car Parking Standards
- Objective ZO4 Ancillary Uses
- Section 14.16.1 Airport Noise
- Table 14.16: Aircraft Noise Zones
- Objective DMSO105 Development within Airport Noise Zones
- Objective DAO18 Safety
- Policy GINHP25 Preservation of Landscape Types
- Objective DMSO203 FCC SuDS Guidance Document
- Objective GINHO15 SuDS
- Objective IUO9 Surface Water Drainage Systems
- Objective IUO11 SuDS in New Developments

Section 3 Introduction

3. Planning Issues

This section outlines the comments of the Planning Authority in respect of the proposed development. These are provided in terms of the policy context and principle of development and subsequently in terms of specific issues associated with the proposal.

3.1 Internal Reports

A number of internal departments within Fingal County Council were consulted on this proposal and their comments have informed this report. Comments were received from the following departments:

Water Services:	Conditions recommended.
Transportation Planning Section:	Conditions recommended.
Parks and Green Infrastructure Division:	Conditions recommended.
Public Lighting:	Conditions recommended.
Heritage Officer:	Conditions recommended.
Environment (Waste):	Condition recommended.
Air and Noise Unit:	Clarity required.

3.2 Report of Council Meeting

The Report of the Chief Executive was presented to the Elected Members of Fingal Council in accordance with Section 37E(5) of the Planning and Development Act 2000, as amended. The Report was considered by the Members at the Council meeting held on the 14th of September 2026. The report was noted and the following sets out views expressed by the members at the meeting.

Issues and concerns raised in relation to:

- Use of the proposed development to power data centres
- Clarity required on the level of electricity generated and will this be provided to data centres, specific projects or residents
- Visual impact
- Scale of development
- Scale of gas fired plants generating electricity
- Proposed development is contrary to climate goals
- Impact on residential amenity
- Emission monitoring
- Concentration of power plants in the Dublin 15 area
- Health and safety concerns given proximity to existing residential dwellings
- Need for due diligence in the assessment of the proposed development
- Environmental impacts
- Impact on carbon footprint

Support in relation to:

- Need to supply power
- The development complies with national and local planning policy

3.3 Principle of Development

The proposed development comprises 2 no. Gas Turbines with an output of 340MW together with ancillary structures and auxiliary equipment associated with each of the two turbines together with all associated development.

At national level, the NPF supports the transition to a carbon neutral and climate resilient society and to reduce greenhouse gas emissions by 51% and increase the share of electricity generated from renewable sources to 80% over the decade (2021 – 2030).

However, Government Policy as set out in the Policy Statement on Security of Electricity Supply states that *'the development of new conventional generation (including gas-fired and gasoil/distillate-fired generation) is a national priority and should be permitted and supported in order to ensure security of electricity supply and support the growth of renewable electricity generation'.*

At regional level, the RSES as set out RPO 10.20 *'Support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the Region and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this Strategy. This Includes the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity and gas transmission grid in a sustainable and timely manner subject to appropriate environmental assessment and the planning process'.*

Noting recent government policy on electricity supply it is considered that the principle of the proposed development is supported and will align with a key target of the Climate Action Plan 2025 for the provision of at least 2 GW of new flexible gas plants by 2030.

At local level, the subject lands are zoned "HI" Heavy Industry with the objective to *"provide for heavy industry"*. The proposed development is considered as a 'Utility installations' as defined in Appendix 7 – Technical Guidance of the Fingal Development Plan 2023 – 2029 as a *'structure composed of one or more pieces of equipment connected to or part of a structure and/ or a facility designed to provide a public utility service such as the provision of heat, electricity, telecommunications, water or sewage disposal and/or treatment'.* Therefore, the principle of the proposed development would be acceptable in terms of the zoning objective.

3.4 Design and Visual Impact

The proposed development comprises of a number of structures located in the northern section of the site. The main structure will comprise the following:

(a) 2 no. Gas Turbines with a maximum height of c.28m
(b) Ancillary Structures for each turbine:

I. Packaged Electrical and Electronic Control Centre (PEECC) with a height of c. 6m and a gross floor area (GFA) of c. 321 sqm
II. Fan cooler systems with a height of c. 4m
III. Continuous Emission Monitoring System (CEMS) Shelter a height of c. 2.9m and GFA of c. 9 sqm
IV. Single storey gas heater structure with a height of c. 3.2m and GFA of c. 43 sqm with a height of c. 3.2m and GFA of c. 30 sqm
V. Backup generator structure with a height of c. 3.2m and GFA of c. 30 sqm
VI. Compressor cleaning structure with a height of c. 3.7m and GFA of c. 11 sqm
VII. Transformer structure with a height of c. 3.2m and GFA of c. 9 sqm
VIII. Associated plant and equipment including a demineralised water tank with a height of c. 5.2m, C02 bottles, and an air dryer with a height of c. 1.9m
IX. Air Insulated Substations (AIS)

(c) 400kV GIS building with height of c. 17m and a gross floor area of c. 907 sqm

In addition to the above each turbine zone will be bound to its northern and part of its eastern boundary by acoustic fencing with a stated height of c. 12m. Landscaping and attenuation storage is indicated in the southern section of the subject site. Existing boundary hedgerows will be retained and extensive planning is proposed along the northeast and southeast of the site. Entrance to the subject site will via a new roundabout to the north which is indicated to connect to the internal road network permitted under Phase 1.
The applicant has submitted a CGI Booklet prepared by McAtavey Architects and a LVIA Photomontages. The Planning Authority also note that Chapter 11 of the EIAR submitted sets out an assessment of the Landscape and Visual Impact of the proposals.

Given the site context and previously permitted development in proximity to the subject site, the Planning Authority consider that the proposals will achieve visual continuity and will appropriately integrate into the receiving environment and therefore will not adversely impact the visual amenity of the surrounding area. If permission is forthcoming on the subject site the Planning Authority recommends that a condition be attached in relation external finishes.

3.5 Impact on the Amenity of the Area
The site currently comprises greenfield lands which are bound by existing hedgerows. The wider area surrounding the site comprises lands which are characterised by greenfield lands, existing industrial / logistics / warehouse development together with a scattering of residential dwellings.

Given the proximity to existing residential dwellings, overlooking, overdominance, overshadowing, and overbearing matters are not considered issues with respect to all aspects of the built form of the proposed development.

During construction there is potential for nuisance from traffic, dust, noise and construction waste and during operational use there is potential for operational noise and air emissions. The Planning Authority notes that Chapters 3 – 16 of the EIAR submitted describes and assessment the impact of the proposal in the receiving environment.

A report received from the Air and Noise Unit (full report in appendices) states that clarity is required with respect a number of items relating the assessment contained in the EIAR and that the applicant is requested to address the following:

- The applicant should clearly indicate which plant items will be installed within the sound insulated building. Further details on the building together with acoustic specifications of the sound insulation to be used in the building should also be provided.
- The applicant should clarify the locations where existing background night-time noise levels were measured in the range of 35 to 50 dB LA90,15min, and where low levels of plant noise from the proposed development may be audible during lulls in other sources. The applicant should also clarify if these locations are residential or not.
- The applicant should clarify the operating scenarios and time periods for all noise impact predictions presented in the report, including noise impact predictions presented in Tables 10-16, 10-17 and 10-18.
- The applicant should clarify the length of the acoustic wall to be installed at each turbine location.
- All of the above is required to be completed by an appropriately qualified acoustician with the necessary acoustic training and experience, and the applicant is advised to seek specialist advice.

Noting the above the Planning Authority considers that given this application is strategic in nature, An Coimisiún Pleanála being the competent authority, need to satisfy themselves that the proposal will not negatively impact on the amenity of the area.

However, should planning permission be forthcoming, the Planning Authority recommends that a condition be attached requiring the submission of a final Construction and Environmental Management Plan prior to commencement.

3.6 Landscape

The applicant has submitted inter alia a Landscape Rationale Report, a Landscape Masterplan together with a series of drawings pre-pared by RMDA Landscape Architects and Consultants. The Planning Authority also notes that Chapter 11 of the EIAR submitted sets out on assessment of Landscape and Visual Assessment.

A report received from the Parks and Green Infrastructure Division (full report in appendices) notes that the last Arboricultural Method Statement (AMS) submitted for the site was prepared by Dr Philip Blackstock in 2022 and therefore it is recommended that the applicant be requested to submit a revised AMS & Tree protection Plan, as no hedgerow protection details have been provided with the current application. In addition, the Parks and Green Infrastructure Division state that given the importance of the existing hedgerows to the site, details of their long-term management and maintenance should be submitted for assessment.

Noting the above the Planning Authority considers that given this application is strategic in nature, An Coimisiún Pleanála being the competent authority, need to satisfy themselves that the proposal will not negatively impact on the trees, hedgerows and the landscape of the area.

However, should planning permission be forthcoming, the Planning Authority recommends that a condition be attached in relation to existing trees, hedgerows and landscaping.

3.7 Built Heritage

Chapter 12 of the EIAR submitted sets out on assessment of Archaeological, Architectural and Cultural Heritage.

A report received from the Heritage Officer (full report in appendices) notes that immediately to the north of the proposed development that the sub-surface remains of a large early medieval enclosure with external gullies and pits was excavated. The Heritage Officer notes that the site of the proposed development has been subjected to geophysical survey (NMS Licence Ref. 22R0092) and archaeological testing (NMS Licence Ref. 22E0348) and while no archaeological remains were identified within the subject site, it is located within an archaeological landscape. Given the scale of the site and the relatively high potential for further identification of archaeological material in the areas beyond those subject to test excavation that a programme of archaeological monitoring is also required.

Noting the above the Planning Authority considers that given this application is strategic in nature, An Coimisiún Pleanála being the competent authority, need to satisfy themselves that the proposal will not negatively impact on built heritage.

Should planning permission be forthcoming, the Planning Authority recommends that a condition be attached requiring a full programme of archaeological monitoring is carried out.

3.8 Access and Transportation

The applicant has submitted inter alia an Engineering Assessment Report, a Traffic Transport Assessment prepared by Waterman Moylan together with a series of drawings. The Planning Authority also notes that Chapter 13 of the EIAR submitted sets out on assessment of Traffic and Transportation.

A report received from the Transportation Planning Section (full report in appendices) sets out an assessment of the proposed development which is summarised below:

- *Access*

The proposed development is located in a 60km/hr speed limit and will be accessed from an internal road network associated with an approved road re-alignment under Reg. Ref. FW22A/0204 / ABB- 317480-23 which is currently under construction.

- *Cycle Parking and Car Parking*

The proposed development includes proposal for 26 no. car parking spaces including 1 no. accessible parking space and 2 no. EV spaces. This is considered acceptable to the Transportation Planning Section given the levels of staff required for both phase 1(2 staff on average up to a max of 25) and phase 2 (2 staff on average up to a max of 5).

- *Traffic and Transport Assessment (TTA)*

A Traffic and Transport Assessment (TTA) submitted includes inter alia a traffic survey and an assessment of the worst case scenario when the development is operational.

The impact of the development on 2 specific junctions that being Junction 1 permitted roundabout currently under construction: (L3120) Kilshane Road / Proposed Site Access and Junction 2 (Kilshane Cross) (signalised crossroads) is also included. The signalised junction of Kilshane Cross is considered to be a sensitive junction and experiences queuing and delays on Kilshane Road. However, the Transportation Planning Section acknowledges that this constraint is outside the control of the applicant and the management of traffic during the construction stage will be paramount.

The Transportation Planning Section noted that there is a slight difference in relation to the amount of construction traffic generated in the peak hours given in the CMP and the TA and that the applicant should fully demonstrate the impact that the traffic generated by the excavation phase and that of construction materials import have been correctly factored into the construction phase traffic and the impact assessment.

- *Preliminary Construction Traffic Management Plan (CTMP)*

The Preliminary Construction Traffic Management Plan prepared by Waterman Moylan Consulting is acceptable to the Transportation Planning Section but lacks sufficient detail in particular in relation to the measures to be put in place for limiting the impact of construction traffic at both the N2 off ramp at Coldwinters and Kilshane Cross during the excavation phase of the development and during the peak hours. Should planning

permission be forthcoming the Transportation Planning Section recommend conditions in relation to the submission of a Final Construction Management Plan and Construction Traffic Management Plan.

- *A Construction Mobility Management Plan (CMMP)/Travel Plan*

The Transportation Planning Section recommends that a revised Travel Plan should be submitted should planning permission be forthcoming.

Noting the above the Planning Authority considers that given this application is strategic in nature, An Coimisiún Pleanála being the competent authority, need to satisfy themselves that the proposal will not negatively impact on the traffic and transportation matters.

However, should planning permission be forthcoming, the Planning Authority recommend that a conditions be attached as recommended by the Transportation Planning Section.

3.9 Services and Drainage

The applicant has submitted inter alia an Engineering Assessment Report, a Flood Risk Assessment prepared by Waterman Moylan together with a series of drawings. The Planning Authority also notes that Chapter 2 of the EIAR submitted sets out civil requirement the proposed development as follow:

- *Water Supply*

As part of the proposed development, it is proposed to connect to the permitted Phase 1 watermain network under ABP-317480-23 (Reg. Ref. FW22A/0204) via a 250mm ⌀ watermain which will loop around the subject site.

- *Foul Sewer and Process Wastewater Infrastructure*

The proposed development will be reliant on the permitted Phase 1 foul water network and pumping station (Confirmation of Feasibility: CDS22004080), which consists of a gravity network which is then pumped south in an 80mm rising main for 1,823m along Kilshane Road to connect to the foul gravity network on Mitchelstown Road.

- *Surface Water Disposal*

The surface water drainage strategy established for the adjacent permitted development will be maintained for the proposed development subject of this application, with the surface water runoff catered by ditches, swales for excess flows and upsizing the underground attenuation.

A report received from the Water Services Department (full report in appendices) states the surface water strategy is deemed acceptable in principle. The Planning Authority

considers that should be permission be forthcoming a number of conditions in is relation to surface water be attached.

On review of the Flood Risk Assessment submitted, Water Services set out that FRA outlines the potential flood risks and mitigation measures associated with the proposed development and in summary, the level of flood risk is deemed to be low/very low, subject to the implementation of the mitigation measures outlined within the FRA submission. This is considered to be acceptable in principle by the Water Services Department.

In terms of water supply and foul sewer and process wastewater infrastructure, the Planning Authority notes Appendix A of the Engineering Assessment Report submitted includes a copy of the Uisce Eireann Confirmation of Feasibility which confirms the following:

Water Connection	*Feasible without infrastructure upgrade by Uisce Éireann*
Wastewater Connection	*Feasible without infrastructure upgrade by Uisce Éireann*

Noting the above the Planning Authority considers that given this application is strategic in nature, An Coimisiún Pleanála being the competent authority, need to satisfy themselves that water & wastewater connections is feasible and that the proposal is acceptable in terms of surface water.

Should planning permission be forthcoming, the Planning Authority recommend that a condition be attached in relation to connections to Uisce Eireann infrastructure.

3.10 Dublin Airport

The subject site is within Dublin Airport Noise Zone A &B, per Table 14.16 of the Fingal Development Plan 2023-2029. However, given the nature of the proposed development it is not considered a noise sensitive development. The development is acceptable in this regard.

The subject site is within the Dublin Airport Outer Public Safety Zone, per the Environmental Resources Management [ERM] Report 2005. In this regard, Objective DAO18 of the Fingal Development Plan 2023-2029 is considered relevant. In the Outer Public Safety Zone, as per Table 6.1 of the ERM report (2005), the proposed development falls under the "working premises" criteria which is limited to not more than 110 persons per half hectare. Once operational, it is stated that the proposed development will require an additional 10 workers.

Should permission be forthcoming, the Planning Authority recommend that a condition be attached that staffing levels shall be less than 110 people per half hectare, in

accordance with the standards set out in Table 6.1 of the ERM report (2005). The development is acceptable in this regard.

3.11 Waste

A preliminary Construction Environmental Management Plan prepared by Waterman Moylan has been submitted. Section 6 of the plan addresses Construction Waste Management. The Planning Authority also notes that Chapter 2 of the EIAR submitted sets out civil requirements for the proposed development in relation to waste disposal and that once operational, the proposed development will adhere to the waste protocols for the Kilshane site and will be subject to the conditions of an Industrial Emissions Licence which will also regulate waste management onsite.

A report received from the Environment Department (full report in appendices) has no objection to the proposal subject to condition. The Planning Authority therefore recommends that should planning permission be forthcoming, a condition be attached whereby a Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for C&D Projects (2021) be submitted and agreed prior to commencement.

3.12 Public Lighting

The applicant has submitted a Site Lighting Report together with a series of drawings prepared by ORS. A report received from the Public Lighting Section (full report in appendices) states whilst some information remains outstanding this can be dealt by condition. The Planning Authority therefore recommends that should planning permission be forthcoming, a condition be attached in relation the final design of public lighting be agreed prior to commencement to commencement.

3.13 Environmental Impact Assessment & Appropriate Assessment

An Environmental Impact Assessment Report prepared by AWN Consulting together with an Appropriate Assessment Screening prepared by Altemar Marine & Environmental Consultancy has been submitted. An Coimisiún Pleanála as the competent authority are the responsible authority for the consideration of the EIAR and Screening Report prepared by the applicant

3.14 Section 48/49 Development Contribution Schemes

Fingal County Council operates a development contribution payment scheme under the current 'Development Contribution Scheme 2026-2030'. A financial contribution would be due having regard to the details of the proposed development and the nature of the proposed development. There are no Section 49 supplementary contributions schemes either adopted or proposed that would affect this development.

3.15 Special Contribution Conditions

There are no special contributions required.

Section 4 Conclusion and Recommendations

4.1 Chief Executive Recommendation

On the basis of the foregoing assessment the Planning Authority considers that subject to compliance with the conditions set out below the proposed development would accord with national, regional and local planning and related policy. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

4.2 Recommended Conditions

The Planning Authority recommends that certain conditions be attached should An Coimisiún Pleanála be mindful to grant permission for this development. These conditions are set out below and are not intended as an exhaustive list.

1. The development shall be carried out in its entirety in accordance with the plans, particulars and specifications lodged with the application, save as may be required by the other conditions attached hereto.
   REASON: To ensure that the development shall be in accordance with the permission, and that effective control be maintained.

2. This permission relates solely to that detailed in the statutory public notices and does not refer to any other aspects of the development that may be shown in the lodged plans.
   REASON: In the interest of the clarity.

3. All of the avoidance, remedial, mitigation and monitoring measures set out in the Environmental Impact Assessment Report and other particulars accompanying the application shall be implemented by the Developer in conjunction with the timelines set out therein, except as may be otherwise required in order to comply with the conditions of this order.
   REASON: In the interest of clarity and the protection of the environment during the construction and operational phases of development.

4. The number of employees and visitors in the development hereby permitted shall comply with the restrictions for the Dublin Airport Outer Public Safety Zone stipulated in the Public Safety Zones Environmental Resources Management (ERM) Report 2005 or such other document as may be approved in lieu of same.
   REASON: In the interests of public safety.

5. A strategy in relation to the use of cranes during construction shall be agreed in writing with the Irish Aviation Authority (IAA), Air Nav Ireland and the Dublin Airport Authority (daa) prior to the commencement of any development on site.
   REASON: In the interest of aviation safety.

6. Prior to the commencement of construction, details of the materials, colours and textures of all external finishes shall be submitted to and agreed in writing by the Planning Authority.
   REASON: In the interest of visual amenity.

7. No surface water / rainwater shall discharge into the foul water system under any circumstances. The surface water drainage shall be in compliance with the Greater Dublin Regional Code of Practice for Drainage Works, Version 6.0, FCC, April 2006.
   REASON: In the interest of public health.

8. Where the Developer proposes to connect to a public water/wastewater network operated by Uisce Éireann, the Developer shall sign a connection agreement with Uisce Éireann prior to the commencement of the development.
   REASON: To ensure adequate provision of water and wastewater facilities.

9. The following requirements shall be complied with in full:
   a. Prior to commencement of development, the developer shall fully demonstrate the impact that the traffic generated by the excavation phase and that of construction materials import have been correctly factored into the construction phase traffic and the impact assessment.
   b. The excavation phase of the approved Phase 1 development shall be completed prior to the commencement of the excavation phase of the proposed development.
   c. The Final Construction Management Plan and Traffic Management Plan shall be agreed in writing with the Planning Authority once the main Contractor has been awarded the contract and prior to any works being carried out.
   d. The Construction Management Plan shall detail the specific measures to be put in place for limiting the impact of construction traffic on the N2 off ramp at Cold Winters and Kilshane Cross during the excavation phase of the development and during the peak hour traffic.
   e. Bay Lane shall not be utilised as a haul route.
   f. A revised Travel Plan shall be submitted for the approval of the Planning Authority that outlines the strategies that will be implemented during construction to minimise private car use, ensure pedestrian and cyclist safety, and manage site logistics during construction and promote the use of carsharing and sustainable transport.
   g. Any works to the public footpath, verge and road carriageway to facilitate the development and any repairs to the public footpath, verge and road carriageway necessary as a result of the development shall be at the expense of the developer and completed to the Councils' standards for taking-in-charge and to the satisfaction of the Council.

h. The development shall not become operational until the road infrastructure permitted under ABP-317480-23 / Reg. Ref. FW22A/0204 has been constructed and opened to public traffic.

REASON: In the interest of traffic safety.

10. The following requirements in relation to existing trees and hedgerow shall be complied with in full:
    a. The developer shall engage the services of a suitably qualified Hedgerow Expert to prepare a Hedgerow Management Plan for all existing hedgerows on the site. The Adams Scale/Hedgerow Management Cycle, developed by Nigel Adams and illustrated by the People's Trust for Endangered Species (PTES), may be used to assess hedgerow condition and inform the preparation of the management plan. The plan shall be submitted to and agreed in writing with the Planning Authority prior to the commencement of development.
    b. An up-to-date Arboricultural Method Statement & Tree Protection Plan shall be submitted to the Planning Authority for written approval. All recommendations and mitigation measures outlined within the approved document shall be fully implemented.
    c. Prior to the commencement of construction works, all protective fencing shall be erected in accordance with the approved Tree Protection Plan. A site meeting shall be held with the Parks & Landscape Officer, the project Arborist, and the site contractor to inspect and discuss all tree protection measures and future hedgerow management requirements. The protective fencing shall remain in place for the duration of the construction period.
    d. A tree bond in the sum of €100,000 shall be lodged with the Council prior to the commencement of development to ensure that all trees and hedgerows identified for retention and protection within the approved Tree Protection Plan are adequately protected and maintained in good condition throughout the course of the development.
    e. Prior to the release of the tree bond, a progress report on the implementation of the approved Hedgerow Management Plan and a post-construction assessment of the condition of all retained trees and hedgerows shall be undertaken by the project Arborist. All recommendations arising from these reports shall be implemented in full. Upon completion, the project Arborist shall submit the written reports together with a Certificate of Effective Completion to the Planning Authority.

REASON: In the interest of visual amenity.

11. The following requirements in relation to landscaping shall be complied with in full:
    a. The submitted Overall Landscape Masterplan and all associated drawings prepared by RMDA shall be implemented in full. All hard and soft landscaping

works shall be carried out in accordance with the approved landscape plans and specifications.

b. All planting associated with the development shall be carried out during the first planting season following completion of the development. Any trees, shrubs, hedgerows, or plants which, within a period of two years from the completion of the development, die, are removed, become seriously damaged, or become diseased shall be replaced with specimens of similar species and size, unless otherwise agreed in writing with the Planning Authority. Replacement planting shall continue until such time as the landscape scheme is satisfactorily established.

c. The project Landscape Architect shall be retained by the developer for the duration of the project to supervise the implementation of the approved landscape plans from commencement through to completion. Upon completion of all landscaping works, the Landscape Architect shall submit a Certificate of Effective Completion to the Planning Authority confirming that the works have been carried out in accordance with the approved plans and specifications.

REASON: In the interest of visual amenity.

12. The following requirements shall be complied with in full:

a. A suitably qualified archaeological consultant should be appointed to oversee the project from design through to planning and construction phase.

b. The developer shall engage the services of a suitably qualified, experienced and licenced eligible archaeologist to carry out archaeological monitoring of all groundworks at the site. No sub-surface work shall be undertaken in the absence of the archaeologist without his/her express consent.

c. The archaeologist shall notify the Department of Housing, Local Government and Heritage in writing at least four weeks prior to the commencement of site preparations.

d. Where archaeological material is shown to be present, avoidance, preservation in situ, or preservation by record (excavation) may be required. Works may be halted pending receipt of advice from the National Monuments Service, Department of Housing, Local Government and Heritage who will advise the Applicant/Developer with regard to these matters.

e. On completion of monitoring of groundworks and prior to occupation of the development, the archaeologist shall submit a written report to the Planning Authority and to the Department of Housing, Local Government and Heritage for their written agreement.

REASON: To ensure the continued preservation (either in situ or by record) of places, caves, sites, features or other objects of archaeological interest.

13. Prior to the commencement of development, the public lighting design shall be submitted and agreed in writing by the Planning Authority to include the following:
    a. The lighting design shall comply with FCC Public Lighting Specification and agreed in writing with the public lighting section.
    b. TIC drawing.
    c. Scaled drawing showing the locations of all public lighting columns and section pillars.
        - Proposed lighting class and lighting levels to be stated on the drawing.
        - Column and luminaire details to be included on the drawing.
        - Any existing public lighting locations at the site entrances and along the site boundary must also be included on the drawing.
    d. Lighting calculation report preferably in Lighting Reality format, with separate calculation grids for different parts of the site (e.g. overall, car parks, site entrances, along the main road.)
        - Luminaire maintenance factor, colour temperature, mounting height, angle of tilt, out-reach, and proposed luminaires to be included in the calculation report.
        - The lighting standard and lighting class the proposed scheme is designed to, must also be stated in the report.
    e. Isolux contour drawing of the proposed lighting levels.
    f. Proposed ducting layout including all access chambers, proposed public lighting section pillars and ESB Networks section pillars.
    g. Product data sheets and drawings of proposed public lighting infrastructure (luminaires, columns, cables, ducting, section pillars, access chambers).
    h. Fingal County Council LED Technical details sheets to be completed for each proposed luminaire.
    i. Circuit schematics and volt-drop calculations for the proposed circuits are required

REASON: In the interest of amenity and public safety.

14. Prior to the commencement of development, the developer shall prepare an updated Construction and Demolition Resource Waste Management Plan (RWMP) as set out in the Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for C&D Projects (2021). The RWMP shall include details of the various waste streams and expected tonnages which will be generated during site clearance, demolition and construction phases and any proposed exportation or importation of soil and stone material including destination/source locations, quantities and if any material will be assessed under By-Product notification. The RWMP shall also include specific proposals as to how the RWMP will be measured and monitored for effectiveness. All records (including for waste and all resources) pursuant to the agreed RWMP shall be made available for inspection at the site office at all times.

REASON: In the interests of public health and to ensure proper planning and sustainable development.

15. Prior to the commencement of development, the developer shall submit for the written agreement of the Planning Authority final details in relation to the following:
    a. Final details in relation to the sound insulation of plant buildings to include acoustic specifications of the sound insulation to be used in the buildings.
    b. Full details in relation to noise assessments.
    c. Final details in relation to the acoustic wall to be installed at each turbine location.
    d. All of the above is required to be completed by an appropriately qualified acoustician with the necessary acoustic training and experience, and the applicant is advised to seek specialist advice

    REASON: In the interests of public health and to ensure proper planning and sustainable development.

16. A detailed Construction Environmental Management Plan (CEMP) shall be prepared and submitted to the Planning Authority for their agreement prior to the commencement of works, or any phase of works, including any enabling works. The CEMP will set out proposed construction activities linked to a construction programme and include a schedule of all environmental protection measures to be employed, the timing of such measures. The CEMP shall include all of the relevant mitigation measures set out in the EIAR and other documentation submitted with the planning application, especially in terms of biodiversity, surface water, air quality (including dust), noise and vibration, construction traffic and resource and waste management.
    REASON: In the interests of public health & to ensure proper planning and sustainable development.

17. All services associated with the proposed development, including electrical, telecommunications, telephone and street lighting cables, shall be located underground. Any relocation of utility infrastructure shall be agreed with the relevant utility provider. Ducting shall be provided by the developer to facilitate the provision of broadband infrastructure within the proposed development.
    REASON: In the interest of visual amenity and to provide a satisfactory standard of amenity in the development.

18. The developer shall comply in full with the following: (a) All necessary measures shall be taken by the applicant/developer to prevent the spillage or deposit of any materials including clay, rubble, or other debris or adjoining roads during the course of development. In the event of any such spillage or deposit, immediate steps shall be taken to remove the material from the road surface at the applicant/developer's

own expense. (b) The applicant/developer shall be responsible for the full cost of repair in respect of any damage caused to the adjoining public road, arising from the construction work and shall either make good any damage to the satisfaction of the Planning Authority or pay the Planning Authority the cost of making good such damage upon issue of such a requirement by the Planning Authority.
REASON: To protect the amenities of the area.

19. The developer shall comply in full with the following:
    a. The hours of operation of all construction sites shall be restricted to between 0700 hours to 1900 hours Monday to Friday, and between 0900 hours to 1300 hours on Saturdays.
    b. No activities shall take place on site on Sundays or Bank Holidays.
    c. Deviation from these times will only be allowed in exceptional circumstances where prior written approval has been received from Fingal County Council. Such approval may be given subject to conditions pertaining to the particular circumstances being set by Fingal County Council.

    REASON: To protect the amenities of the area.

Yours faithfully,

Sean Walsh

Sean Walsh
Senior Planner

Date: 17/9/26

Appendix 1 – Consultee Reports
Water Services

FINGAL COUNTY COUNCIL INTERNAL CONSULTEE
PLANNING REPORT
Report of the Water Services Department

Register Reference: SID/01/26
Registration Date: 22-May-2026
Development: Planning Application for a Strategic Infrastructure Development Comprising a 680 MW Open Cycle Gas-Fired Generation Station and Associated Development
Location: Kilshane Road, Kilshane, Finglas, Dublin 11
Applicant: Kilshane Energy Limited
Application Type: Strategic Infrastructure Development

Report

Surface Water: ***No objection subject to***

1. An Engineering Assessment Report, prepared by Waterman Moylan, has been provided with the submission, outlining the surface water calculations, modelling data and SUDS proposals. The developer intends to implement a number of SUDS measures as part of the overall drainage strategy for the overall proposed development:
   - An underground attenuation tank will be provided alongside the existing U/G tanks, to serve this phase of the development and this will ensure that the instantaneous surface water runoff rate from the site will not exceed the greenfield runoff rate. Water quality to be managed by controlling the volume and treating the discharge in line with SUDS principles.
   - Surface water run-off will be collected via roadside tree pits and swales, which will act as site control measures. Additionally, the compound area will be a gravel/stone area to allow for permeability. These measures will act as interception, treatment and storage for surface water runoff, prior to discharge to the existing surface water drainage.
   - Petrol interceptors will be installed prior to discharge to the existing surface water drainage.

   In summary, the surface water strategy is deemed acceptable in principle.
2. No surface water / rainwater is to discharge into the foul water system under any circumstances.
3. The surface water drainage must be in compliance with the Greater Dublin Regional Code of Practice for Drainage Works, Version 6.0, FCC, April 2006.

Flooding: ***No Objection***

A Flood Risk Assessment, prepared by Waterman Moylan, has been provided as part of the submission, which outlines the potential flood risks and mitigation measures associated with the proposed development. In summary, the level of flood risk is deemed to be low/very low, subject to the implementation of the

mitigation measures outlined within the FRA submission. This is considered to be acceptable in principle.

Officer: __TM_____ Endorsed: DD
Date: ___13/07/2026_____ Date: 13/07/2026

Transportation Planning Section

FINGAL COUNTY COUNCIL INTERNAL CONSULTEE
PLANNING REPORT
Report of the Transportation Planning Section

Register Reference:	SID/01/26
Registration Date:	22-May-2026
Development:	Planning Application for a Strategic Infrastructure Development Comprising a 680 MW Open Cycle Gas-Fired Generation Station and Associated Development
Location:	Kilshane Road, Kilshane, Finglas, Dublin 11
Applicant:	Kilshane Energy Limited
Application Type:	Strategic Infrastructure Development

General

The proposed development is located within the townland of Kilshane, located to the west of the N2 at Kilshane Road, Kilshane, Finglas, Dublin 11 and located to the south of Kilshane Road and the permitted development FCC Reg. Ref.: FW22A/0204 (ABP Ref.: 317480-23) as amended by FCC Reg. Ref.: FW25A/0523E, and adjacent to the permitted development 220kV Gas Insulated Switchgear substation permitted under ACP Ref.: 314894-22, west of the M2 motorway, to the north of Roadstone Huntstown Quarry, and to the east of agricultural lands and Northwest Logistics Park.

The proposed development consists of a Power Generation Station including:

- (2 no. Open Cycle Gas Turbines) along associated ancillary structures, and services,
- Air Insulated Substation (AIS) adjacent to each of the turbines.
- A 400kV Gas Insulated Switchgear (GIS) substation
- access and services to connect to the adjacent permitted development.

Access

The proposed development is located in a 60km/hr speed limit accessed from an internal road network associated with an approved road re-alignment under reg. ref. FW22A/0204 currently under construction.

Cycle Parking and Car Parking

Given the levels of staff required for both phase 1(2 staff on average up to a max of 25) and phase 2 (2 staff on average up to a max of 5) the permitted 26 car parking spaces and Cyle parking spaces are sufficient to accommodate the proposed development

Traffic and Transport Assessment (TTA)

A Traffic and Transport Assessment (TTA) has been submitted with the application prepared by Waterman Moylan Consulting Engineers. The existing traffic conditions for the subject site were derived from the Planning Application Reg. Ref. No. FW24A/0339E. The proposed development includes a traffic survey carried out by IDASO on Thursday 2nd May 2024 over the course of 12 hours (7:00am to 7:00pm).

The assessment is based on the worst case scenario for when the development is operational and up to 30 staff are attending and includes cumulative assessment of permitted development in the area and during the excavation phase of construction.

The following junctions have been considered for assessment.

- Junction 1 permitted roundabout currently under construction: (L3120) Kilshane Road / Proposed Site Access
- Junction 2 (Kilshane Cross) (signalised crossroads

Trip generation potential for the proposed development has been estimated based on the staff number and goods deliveries. The assessment concluded that during both the construction and operation phases, Junction 1 and Junction 2 are expected to experience a two-way traffic increase of less than 5% (TII Thresholds) during both the AM and PM peak hours, representing neutral and not-significant alterations to the junctions. Therefore, no further traffic assessment was deemed necessary for both phases of the subject development. The submission indicates that the development will exceed the 2.5% threshold that the Council applies to local junctions where further analysis would be sought.

The construction period for the subject development is expected to overlap with that of the approved Phase 1 development, and it is assumed that excavation for the approved Phase 1 development will be completed prior to the commencement of the current development.

During the excavation phase, a total of approximately 31 to 36 HGV movements per day is anticipated. Peak hour construction Traffic including HGV traffic is detailed below table.

The signalised junction of Kilshane Cross is considered to be a sensitive junction and experiences queuing and delays on Kilshane Road. However, the Transportation Planning Section acknowledges that this constraint is outside the control of the applicant and the management of traffic during the construction stage will be paramount.

- It is noted that there is a slight difference in relation to the amount of construction traffic generated in the peak hours given in the CMP and the TA. The applicant should fully demonstrate the impact that the traffic generated by the

excavation phase and that of construction materials import have been correctly factored into the construction phase traffic and the impact assessment.

Preliminary Construction Traffic Management Plan (CMP)
The outline plan is acceptable but lacks detail. The final plan should address in more detail the measures to be put in place for limiting the impact of construction traffic at both the N2 off ramp at Cold Winters and Kilshane Cross during the excavation phase of the development and during the peak hours.

All details regarding safety issues including the appropriate signage and traffic management (as required) should form part of the TMP and licencing procedures. This will include abnormal load routes and access requirements and arrangements. All relevant Abnormal Load licences road opening licenses, setting out construction working hours, lane closures, road closures etc. shall be obtained within the appropriate time periods prior to the commencement of construction works for the proposed development. It should be noted that restricted hours would apply during the peak hour traffic periods or as specified by the Operations Department Traffic Section. All measures to mitigate the impact of the proposed works on the public road network shall be agreed as part of the Construction Stage Traffic Management Plan in conjunction with the Council.

- The Final Construction Management Plan and Construction Traffic Management Plan shall be agreed in writing with the Planning Authority once the main Contractor has been awarded the contract and prior to any works being carried out.
- The Construction Management Plan shall detail the specific measures to be put in place for limiting the impact of construction traffic at both the N2 off ramp at Cold Winters and Kilshane Cross during the excavation phase of the development and during the peak hour traffic.
- Bay Lane shall not be utilised as a haul route.

A Construction Mobility Management Plan (CMMP)/Travel Plan
A Plan has been submitted to support the development.

- A revised Travel Plan shall be submitted for the approval of the Planning Authority that outlines the strategies that will be implemented during construction to minimise private car use, ensure pedestrian and cyclist safety, and manage site logistics during construction and promote the use of carsharing and sustainable transport.

Conclusion

If a grant of permission is being considered the Infrastructure and Transport Department recommends that the following conditions be applied:

- It is noted that there is a slight difference in relation to the amount of estimated construction traffic generated in the peak hours given in the CMP and the TTA. The applicant should fully demonstrate the impact that the traffic generated by the excavation phase and that of construction materials import have been correctly factored into the construction phase traffic and the impact assessment.
- The excavation phase of the approved Phase 1 development shall be completed prior to the commencement of the excavation phase of the proposed development.
- The Final Construction Management Plan and Traffic Management Plan shall be agreed in writing with the Planning Authority once the main Contractor has been awarded the contract and prior to any works being carried out.
- The Construction Management Plan shall detail the specific measures to be put in place for limiting the impact of construction traffic on the N2 off ramp at Cold Winters and Kilshane Cross during the excavation phase of the development and during the peak hour traffic.
- Bay Lane shall not be utilised as a haul route.
- A revised Travel Plan shall be submitted for the approval of the Planning Authority that outlines the strategies that will be implemented during construction to minimise private car use, ensure pedestrian and cyclist safety, and manage site logistics during construction and promote the use of carsharing and sustainable transport.
- Any works to the public footpath, verge and road carriageway to facilitate the development and any repairs to the public footpath, verge and road carriageway necessary as a result of the development shall be at the expense of the developer and completed to the Councils' standards for taking-in-charge and to the satisfaction of the Council.
- All necessary measures shall be taken by the applicant/developer to prevent the spillage or deposit of any materials including clay, rubble or other debris on adjoining roads during the course of development. In the event of any such spillage or deposit, immediate steps shall be taken to remove the material from the road surface at the applicant/developers own expense.
- The applicant/developer shall be responsible for the full cost of repair in respect of any damage caused to the adjoining public road arising from the construction work associated with the proposed development and shall either make good any damage to the satisfaction of the Council or pay the Council the cost of making good any such damage upon issue of such a requirement by the Council.

- The development shall not become operational until the road infrastructure permitted under reg. ref. FW22A/0204 has been constructed and opened to public traffic.

Officer:		Endorsed:	**Niamh O Connor**
Date:		Date:	**16/07/2026**

Parks and Green Infrastructure Division

FINGAL COUNTY COUNCIL INTERNAL CONSULTEE
PLANNING REPORT
Report of Parks and Green Infrastructure Division

Register Reference: SID/01/26
Registration Date: 22-May-2026
Development: Planning Application for a Strategic Infrastructure Development Comprising a 680 MW Open Cycle Gas-Fired Generation Station and Associated Development
Location: Kilshane Road, Kilshane, Finglas, Dublin 11
Applicant: Kilshane Energy Limited
Application Type: Strategic Infrastructure Development

Report

The last Arboricultural Method Statement (AMS) submitted for this site was prepared by Dr Philip Blackstock in 2022. The applicant should be requested to submit a revised AMS & Tree protection Plan, as no hedgerow protection details have been provided with the current application. In addition, given the importance of the existing hedgerows to the site, details of their long-term management and maintenance should be submitted for assessment.

If planning permission is granted, the following conditions should be attached:

Existing Trees and Hedgerows

a. The applicant shall engage the services of a suitably qualified Hedgerow Expert to prepare a Hedgerow Management Plan for all existing hedgerows on the site. The Adams Scale/Hedgerow Management Cycle, developed by Nigel Adams and illustrated by the People's Trust for Endangered Species (PTES), may be used to assess hedgerow condition and inform the preparation of the management plan. The plan shall be submitted to and agreed in writing with the Planning Authority prior to the commencement of development.

b. An up-to-date Arboricultural Method Statement & Tree Protection Plan shall be submitted to the Planning Authority for written approval. All recommendations and mitigation measures outlined within the approved document shall be fully implemented.

c. Prior to the commencement of construction works, all protective fencing shall be erected in accordance with the approved Tree Protection Plan. A site meeting shall be held with the Parks & Landscape Officer, the project Arborist, and the site contractor to inspect and discuss all tree protection measures and future hedgerow management

requirements. The protective fencing shall remain in place for the duration of the construction period.

d. A tree bond in the sum of €100,000 shall be lodged with the Council prior to the commencement of development to ensure that all trees and hedgerows identified for retention and protection within the approved Tree Protection Plan are adequately protected and maintained in good condition throughout the course of the development.

e. Prior to the release of the tree bond, a progress report on the implementation of the approved Hedgerow Management Plan and a post-construction assessment of the condition of all retained trees and hedgerows shall be undertaken by the project Arborist. All recommendations arising from these reports shall be implemented in full. Upon completion, the project Arborist shall submit the written reports together with a Certificate of Effective Completion to the Planning Authority.

Landscaping Conditions

a. The submitted Overall Landscape Masterplan and all associated drawings prepared by RMDA shall be implemented in full. All hard and soft landscaping works shall be carried out in accordance with the approved landscape plans and specifications.

b. All planting associated with the development shall be carried out during the first planting season following completion of the development. Any trees, shrubs, hedgerows, or plants which, within a period of two years from the completion of the development, die, are removed, become seriously damaged, or become diseased shall be replaced with specimens of similar species and size, unless otherwise agreed in writing with the Planning Authority. Replacement planting shall continue until such time as the landscape scheme is satisfactorily established.

c. The project Landscape Architect shall be retained by the developer for the duration of the project to supervise the implementation of the approved landscape plans from commencement through to completion. Upon completion of all landscaping works, the Landscape Architect shall submit a Certificate of Effective Completion to the Planning Authority confirming that the works have been carried out in accordance with the approved plans and specifications.

Officer: _____ Endorsed: _Annie Meagher_____

Date: _____ Date: _20/07/2026_____

Public Lighting

FINGAL COUNTY COUNCIL INTERNAL CONSULTEE
PLANNING REPORT
Report of the Public Lighting Section

Register Reference:	SID/01/26
Registration Date:	22-May-2026
Development:	Planning Application for a Strategic Infrastructure Development Comprising a 680 MW Open Cycle Gas-Fired Generation Station and Associated Development
Location:	Kilshane Road, Kilshane, Finglas, Dublin 11
Applicant:	Kilshane Energy Limited
Application Type:	Strategic Infrastructure Development

Report

The lighting submission has been noted. Some information remains outstanding. This can be dealt with by way of additional information or by condition if the application is granted. If granted, please see the following conditions:

1. The lighting design should comply with FCC Public Lighting Specification and agreed in writing with the public lighting section.
2. TIC drawing.
3. Scaled drawing showing the locations of all public lighting columns and section pillars.
    - Proposed lighting class and lighting levels to be stated on the drawing.
    - Column and luminaire details to be included on the drawing.
    - Any existing public lighting locations at the site entrances and along the site boundary must also be included on the drawing.
4. Lighting calculation report preferably in Lighting Reality format, with separate calculation grids for different parts of the site (e.g. overall, car parks, site entrances, along the main road.)
    - Luminaire maintenance factor, colour temperature, mounting height, angle of tilt, outreach, and proposed luminaires to be included in the calculation report.
    - The lighting standard and lighting class the proposed scheme is designed to, must also be stated in the report.
5. Isolux contour drawing of the proposed lighting levels.
6. Proposed ducting layout including all access chambers, proposed public lighting section pillars and ESB Networks section pillars.
7. Product data sheets and drawings of proposed public lighting infrastructure (luminaires, columns, cables, ducting, section pillars, access chambers).
8. Fingal County Council LED Technical details sheets to be completed for each proposed luminaire.

9. Circuit schematics and volt-drop calculations for the proposed circuits are required

Officer: Kevin Broderick Endorsed: _____

Date: 06/07/2026 Date: _____

FINGAL COUNTY COUNCIL INTERNAL CONSULTEE
PLANNING REPORT
Report of the Heritage Officer

Register Reference: SID/01/26
Registration Date: 22-May-2026
Development: Planning Application for a Strategic Infrastructure Development Comprising a 680 MW Open Cycle Gas-Fired Generation Station and Associated Development
Location: Kilshane Road, Kilshane, Finglas, Dublin 11
Applicant: Kilshane Energy Limited
Application Type: Strategic Infrastructure Development

Report

Information pertaining to the archaeological remains was also included Chapter 12 Archaeological, Architectural and Cultural Heritage and Appendix 12 of the EIAR by AWN Consulting (dated September 2022).

To note section 12.1 contains this erroneous statement
'Archaeological heritage generally refers to objects, monuments, buildings or landscapes of an (assumed) age typically older than AD1700 and usually recorded as archaeological sites within the Record of Monuments and Places.... The term architectural heritage applies to structures, buildings, their contents and setting of an (assumed) age, typically younger than 1700 CE....'
As overlapping designations show (Recorded Monuments/RPS) this is not the case.

Immediately to the north of the proposed development the sub-surface remains of a large early medieval enclosure with external gullies and pits was excavate. The site of the proposed development has been subjected to geophysical survey (NMS Licence Ref. 22R0092) and archaeological testing (NMS Licence Ref. 22E0348). While no archaeological remains were identified within the subject site, it is located within an archaeological landscape.

Given the scale of the site and the relatively high potential for further identification of archaeological material in the areas beyond those subject to test excavation the following is required;

1. A suitably qualified archaeological consultant should be appointed to oversee the project from design through to planning and construction phase.
2. A programme of archaeological monitoring is also required

- All ground reduction should be subject to a programme of archaeological monitoring, under licence, by a suitably qualified archaeologist.
- Where archaeological material is shown to be present, avoidance, preservation in situ, or preservation by record (excavation) may be required. Works may be halted pending receipt of advice from the National Monuments Service, Department of Housing, Local Government and Heritage who will advise the Applicant/Developer with regard to these matters.
- On completion of monitoring of groundworks, and any excavations arising, the archaeologist shall submit a written report to the Planning Authority and to the Department of Housing, Local Government and Heritage for consideration.

3. The above should be included in the Construction and Environmental Management Plan for the site.

Officer: ___Christine Baker____ Endorsed: _____

Date: _____14/07/2026_____ Date: _____

Environment (Waste)

Comhairle Contae Fhine Gall
Fingal County Council

An Roinn Comhshaoil, Gníomhaíochta ar son na hAeráide, Taistil Gníomhaigh & Spóirt
Environment, Climate Action, Active Travel and Sports Department

7st July 2026

Sarah Lowther
Planning Officer
Planning Department.

Register Ref:	**SID/01/26**
Location:	Kilshane Road, Kilshane, Finglas, Dublin 11
Applicant:	Kilshane Energy Limited
Development:	Planning Application for a Strategic Infrastructure Development Comprising a 680 MW Open Cycle Gas-Fired Generation Station and Associated Development
App. Type	Strategic Infrastructure Development
Date Recd.:	July 1, 2026

With reference to the above application the Environment Section (Waste Enforcement & Regulation) have the following comments:

1/ Prior to the commencement of development, the applicant shall prepare an updated Construction and Demolition Resource Waste Management Plan (RWMP) as set out in the **Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for C&D Projects (2021)**. The RWMP shall include details of the various waste streams and expected tonnages which will be generated during site clearance, demolition and construction phases and any proposed exportation or importation of soil and stone material including destination/source locations, quantities and if any material will be assessed under By-Product notification. The RWMP shall also include specific proposals as to how the RWMP will be measured and monitored for effectiveness. All records (including for waste and all resources) pursuant to the agreed RWMP shall be made available for inspection at the site office at all times.

Regards

Maeve Cronin

Executive Scientist

Áras an Chontae, Sord, Fine Gall, Co. Bhaile Átha Cliath
County Hall, Main Street, Swords, Co. Dublin K67 X8Y2
t: (01) 890 5000 e: CustomerCareUnit@fingal.ie www.fingal.ie

Air and Noise Unit

FINGAL COUNTY COUNCIL INTERNAL CONSULTEE
PLANNING REPORT
Report of Environment - Air & Noise Unit
Register Ref: SID/01/26
Development: Planning Application for a Strategic Infrastructure Development Comprising a 680 MW Open Cycle Gas-Fired Generation Station and Associated Development
Location: Kilshane Road, Kilshane, Finglas, Dublin 11
Applicant : Kilshane Energy Limited
Application Type : Permission (SID)

Report
The Air and Noise Unit have the following comments in respect of this application:

- We note that the application is for two additional gas turbines with an output of 340 Megawatts (MW) per turbine (Phase 2), in addition to the already permitted Gas Turbine Power Generation Station at Kilshane Road, Kilshane, Finglas, Dublin 11 (Phase 1).
- The EIAR identified the nearest Noise Sensitive Locations, with background noise monitoring carried out in July 2025. Potential noise impacts on these noise receptors were examined for the construction phase and the operational phase of the proposed development.
- Potential impacts from the construction phase were examined and found to be negative, not significant and short-term. These impacts could be mitigated by a condition requiring the submission of a Construction and Environmental Management Plan prior to commencement.
- Potential impacts from the operational phase were examined in the EIAR, with power plant noise and additional vehicular traffic on public roads deemed to be the primary sources.
- For the power plant noise, the applicant prepared a 3D computer-based noise prediction model to quantify the operational noise level associated with the proposed development.
- In relation to the power plant, section 10.4.2.1 of the EIAR states that there are two modes in which the dual-fuel power plant can operate: (1) Gas fuel operation (2) Liquid fuel operation. The EIAR states that certain items of plant are relevant to only one mode: in gas fuel operation, the demineralised water pump, fuel oil pump and liquid fuel module do not operate; in liquid fuel operation, the fuel gas heater skid and separator skid do not operate. The EIAR states that these plant items will be installed within a building with sufficient sound insulation to ensure that their noise contribution will be insignificant, however it is not clear what

acoustic specifications will be used for the proposed sound insulation. This should be clarified.

- Section 10.4.2.2 of the EIAR looked at noise impacts during the night-time period, which are most sensitive, and found that the cumulative predicted impacts ranged from 'imperceptible' (no change) to 'not significant' (+1 dB) as per Table 10-16. However, it is not clear what operational mode these cumulative predictions refer to and if they are in respect of Phase 2 operation only, or Phase 1 and 2 operating simultaneously. This should be clarified.
- Cumulative impacts were examined in more detail in section 10.7. In section 10.7.1, it was noted by the applicant that the existing ambient noise levels in the area were dominated by aircraft and road traffic noise from the local road network. It was also noted that 'At certain locations during night-time periods where existing background noise levels were measured in the range of 35 to 50 dB LA90,15min, low levels of plant noise from the proposed development may be audible during lulls in other sources'. No further information has been provided to identify these locations and confirm if these are residential locations or not. This should be clarified, particularly the site(s) where 35dB was measured.
- In section 10.7.3, the EIAR examined the cumulative impacts of various operational modes at the site, and found the following:
  - The cumulative impacts of both Phase 1 and Phase 2 for gas operation are predicted to range from 'imperceptible' (no change) to 'not significant' (+2dB) at Noise Sensitive Locations, as per Table 10-17.
  - The cumulative impacts of both Phase 1 and Phase 2 for liquid operation are predicted to range from 'imperceptible' (no change) to 'slight' (+3dB) at Noise Sensitive Locations, as per Table 10-18.

  However, for both tables it is not stated if these are day-time or night-time impacts. This should be clarified.
- Other related developments including an Above Ground Installation facility, a Gas Insulated Switchgear (GIS) facility, substation and grid connections, have been reviewed by the applicant for cumulative impacts, and significant cumulative noise impacts are not considered likely.
- The EIAR confirms that all plant will be selected to ensure that no tonal or excessive low frequency noise emissions are evident at the Noise Sensitive Locations. The EIAR also states that noise from external plant will be minimised by purchasing low noise generating equipment and incorporating appropriately specified in-line attenuators for stacks and exhausts where necessary. A 12m high acoustic wall is proposed for each turbine to reduce noise levels at Noise Sensitive Locations. The length of this acoustic wall at each turbine should be clarified.
- The proposed development is not expected to add a significant amount of additional traffic to the surrounding road network during operation, and any change in noise level is expected to be 'imperceptible'.

- Section 2.2.2 of the EIAR confirms that the site is regulated by an existing EPA Industrial Emissions (IE) Licence (reference P1208-01), which sets out limits and monitoring requirements for various parameters including noise emissions from the Kilshane site. It is expected that a licence review will be required to reflect the design changes at the site resulting from the proposed development. The proposed development will be required to operate within the licensed emission limits set for the Kilshane site, including noise limits.

In respect of the above, our comments are as follows:

1. The applicant should clearly indicate which plant items will be installed within the sound insulated building. Further details on the building together with acoustic specifications of the sound insulation to be used in the building should also be provided.
2. The applicant should clarify the locations where existing background night-time noise levels were measured in the range of 35 to 50 dB LA90,15min, and where low levels of plant noise from the proposed development may be audible during lulls in other sources. The applicant should also clarify if these locations are residential or not.
3. The applicant should clarify the operating scenarios and time periods for all noise impact predictions presented in the report, including noise impact predictions presented in Tables 10-16, 10-17 and 10-18.
4. The applicant should clarify the length of the acoustic wall to be installed at each turbine location.
5. All of the above is required to be completed by an appropriately qualified acoustician with the necessary acoustic training and experience, and the applicant is advised to seek specialist advice.

Officer: Rebecca Walsh, Executive Scientist

Signature: Rebecca Walsh

Date: 16.07.2026

Appendix 2 – Letter from An Coimisiún Pleanála

Our Case Number: ACP-324305-26

An Coimisiún Pleanála

Fingal County Council
County Hall
Main Street
Swords
Co. Dublin
K67 X8Y2

Date: 25 May 2026

Re: Proposed development of a 680MW Gas-Fired Generation Station
at Kilshane Road, Kilshane, Finglas, Dublin 11 (www.kilshanephase2sid.com)

Dear Sir / Madam,

An Coimisiún Pleanála has received an application for permission under section 37E of the Planning and Development Act 2000, as amended.

It is noted that a copy of the application relating to the proposed development has been sent to the offices of the planning authority.

Please be advised that you are requested to make the application documentation available for public inspection/purchase at your offices in accordance with the terms of the public notice. The pre-application consultation file already sent to you must be associated with the application file documentation. It is the Commission's intention that all of the application documentation will remain available for public inspection during the currency of the application.
Written submissions in relation to the proposed development should be made directly to An Coimisiún Pleanála. Please be advised that a fee of €50 is payable to the Commission in order to make a submission on this application.

Please be advised that An Coimisiún Pleanála will contact you via email with a direct link to our website, where you will be able to view all submissions received on the application.

Section 37E(4) of the Planning and Development Act 2000, as amended, requires you to submit to the Commission a report setting out the views of the authority on the effects of the proposed development on the environment and the proper planning and sustainable development of the area of the authority within a period of 10 weeks from the making of the application to the Commission. The application was made to the Commission on the 22nd May 2026 and I can confirm that the deadline for the submission of the report is therefore on or before the **30th July 2026**.

Please be advised that the Commission may not be in a position to extend the deadline referred to above having regard to the timelines within which the Commission is required to make a decision.

In addition to the information required to be submitted with this report by the provisions of section 37E(4-7) please note that the Commission requests that the report address, where relevant, all of the issues identified at section 7 of the "Guidelines for Planning Authorities" in respect of section 37A of the Act (which are available on the Commission's website at www.pleanala.ie).

Teil: Tel (01) 858 8100
Glao Áitiúil LoCall 1800 275 175
Láithreán Gréasáin Website www.pleanala.ie
Ríomhphost Email communications@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

A copy of the planning authority report should also be placed on the public file at the planning authority office.

Thank you for your co-operation in this matter. If you have any queries in relation to the matter please contact the undersigned officer of the Commission.

Please quote the above-mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

PP

Ellen Moss
Executive Officer
Direct Line: 01-8737285

PA02

Teil: (01) 858 8100
Glao Áitiúil: LoCall 1800 275 175
Facs: Fax (01) 872 2684
Láithreán Gréasáin: Website www.pleanala.ie
Ríomhphost: Email communications@pleanala.ie

64 Sráid Mac Gabhráin, Baile Átha Cliath 1, D01 V902
64 Marlborough Street, Dublin 1, D01 V902

Appendix 2: Construction Traffic Assessment Technical Note prepared by Waterman Moylan Consulting Engineers

TECHNICAL NOTE

Project:	**Kilshane Power Station**	**Job No:**	25-046
Subject:	**Construction Traffic Assessment**	**Revision:**	**1**
Prepared by:	**Fernando De Maio**	**Date:**	07/10/2026
Checked by:	**Kevin Muhia**	**Date:**	08/10/2026
Approved by:	**Mark Duignan**	**Date:**	20/10/2026

1. Introduction

This Technical Note has been prepared by Fernando De Maio (MSc, PostGradDip (Transport Policy & Planning), MIEI), Associate at Waterman Moylan Consulting Engineers, and approved by Mark Duignan (BA, BAI (Civil Eng), CEng, MIEI), Associate Director at Waterman Moylan Consulting Engineers, in response to comment issued by An Coimisiún Pleanála in relation to ACP-324305-26, Proposed Development of a 680 MW Gas-Fired Generation Station at Kilshane Road, Kilshane, Finglas, Dublin 11.

The received comment indicates:

> *The Transportation Planning Section noted that there is a slight difference in relation to the amount of construction traffic generated in the peak hours given the CMP and the TA and that the applicant should fully demonstrate the impact that the traffic generated by the excavation phase and that of construction materials import have been correctly factored into the construction phase traffic and the impact assessment*.

2. Response

The Construction Traffic Assessment included in Sections 6.1.1 and 7.2.1 of the Traffic and Transport Assessment prepared by Waterman Moylan Consulting Engineers, submitted as part of the planning application for the proposed 680MW Gas-Fired Generation Station at Kilshane Road, Kilshane, Finglas, Dublin 11 (ACP-324305-26), provides the details of the assessment of the likely traffic movements to and from the site during the construction phase.

The summary included within the Preliminary Construction Management Plan is provided for reference purposes only and should not be considered a substitute for the Construction Traffic Assessment contained within the Traffic and Transport Assessment, which remains the primary document for the assessment of construction traffic impacts associated with the proposed development

Furthermore, the traffic figures presented in the aforementioned assessment, and partially reproduced below, have been developed based on the experience and professional judgement of the engineers and transport specialists at Waterman Moylan Consulting Engineers. Full Preliminary Construction Traffic Assessment is included in Sections 6.1.1 and 7.2.1 of the TTA.

It worth nothing that the anticipated HGV and workforce movements associated with the construction site may vary depending on the contractor's available resources, stakeholder requirements, programme constraints, weather conditions, and other site-specific technical or operational considerations that may require prompt action during the construction process. Therefore, the appointed contractor will be responsible for preparing the final Construction Traffic Management Plan, taking account of the proposed construction methodology, available resources, and the level of detail required by Fingal County Council, including its Roads, Planning and Environment Departments, Transport Infrastructure Ireland, and any other relevant statutory authority.

2.1 Preliminary Construction Traffic Generation

This Construction Traffic Assessment has been carried out considering the following:

- Construction Work Schedule: The normal working week is 39 hours worked over five days between Monday and Friday each week. Normally Monday-Thursday from 07:00 to 17:00, with a minimum of 8 working hours, and Friday from 7:00 to 4:00, with a minimum of 7 working hours.
- This assessment assumes that workers should arrive on site before 07:00 and leave after 16:00.
- HGV movements associated with the development are assumed to occur between 07:30 and 16:00.
- For the purposes of this assessment, it has been conservatively assumed that excavation material removal vehicles will operate on weekdays only (Monday to Friday).
- 20 working days per month.
- Preliminary calculations for the excavation required by the proposed development indicate a total volume of 63,856 m³.
- A truck carrying capacity of 15m³ has been assumed.
- The traffic survey results show that the peak traffic hours on the surrounding road network occur between 08:00 and 09:00 during the morning peak and between 17:00 and 18:00 during the evening peak.

Based on the above assumptions, it has been estimated that earthworks activities will generate up to 26 HGV arrivals and 26 HGV departures per day. In addition, further 10 two-way HGV movements per day associated with stone deliveries, large concrete pours, and other construction-related activities have been considered. For the purposes of this assessment, it has been assumed that up to five two-way HGV movements may occur during the AM peak hour, with the remaining HGV movements distributed throughout the remainder of the working day.

The TTA assumes a peak construction workforce of approximately 250 personnel on site per day. Based on an average vehicle occupancy of 1.25 persons per vehicle, this would equate to approximately 200 car arrivals and 200 car departures per day. Taking account of the anticipated working hours, it has been assumed that approximately 5% of the workforce will arrive during the AM peak hour, while approximately 20% of the workforce will depart during the PM peak hour.

The trips generated are shown in the table below.

	AM Peak Hour (08:00 - 09:00)		PM Peak Hour (17:00 - 18:00)	
	Arrivals	Departures	Arrivals	Departures
Construction Traffic	23	13	0	40

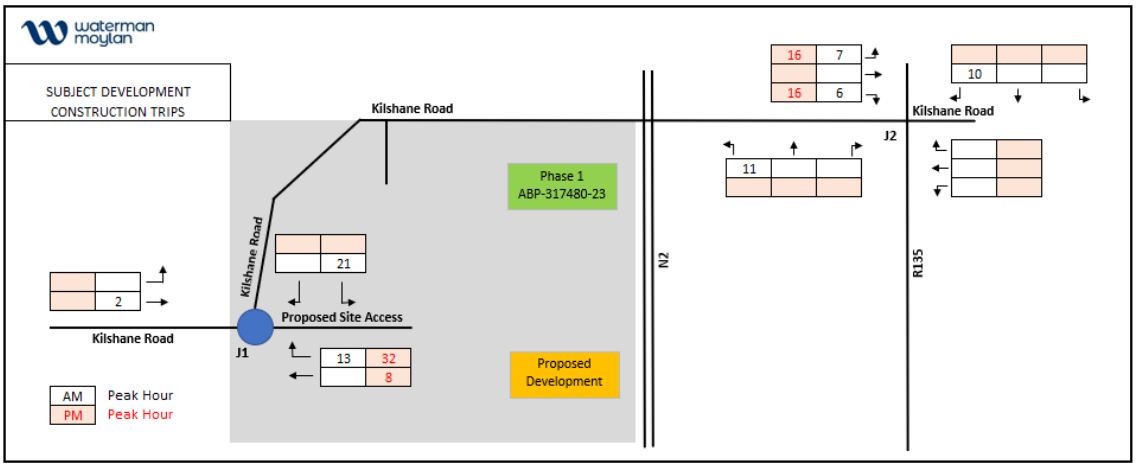
In table above, the 5 two-way HGV movements have been expressed in PCU (1 HGV = 2.5 PCU).

2.2 Assumed Trip Distribution

It has been assumed that approximately 80% of construction traffic will travel via the N2, with 40% using Junction 2, located north of Kilshane Road, and a further 40% using the free-flow slip road from the northbound N2, situated south of Kilshane Road. These vehicles will then access the site via Kilshane Road and the permitted roundabout. The remaining 20% of construction traffic is expected to approach the site from the west via the N3 or from established residential areas located east of the proposed development site.

As construction personnel are anticipated to remain on site throughout the working day, outbound traffic during the AM peak hour is expected to consist predominantly of HGV movements.

A similar directional distribution has been assumed for the PM peak period.



2.3 Traffic impact of the Subject Development

The traffic impact of the proposed development during the construction phase has been assessed in accordance with the *TII Traffic and Transport Assessment Guidelines (2014).* The results of this assessment are summarised below:

Junction	Junction Base Year Flow - AM Peak Hour	Junction Base Year Flow - PM Peak Hour	Additional Traffic Two-way Flow (AM)	Additional Traffic Two-way Flow (PM)	% Expected Increase (AM)	% Expected Increase (PM)
1	1,159	953	36	40	3%	4%
2	2,059	1,937	34	32	2%	2%

Table 1 | *Existing and Expected Two-way Flows – Construction Phase*

As shown in the table above, during the construction phase, Junction 1 and Junction 2 are expected to experience a two-way traffic increase of less than 5% during both the AM and PM peak hours. This level of increase is considered negligible and is not expected to result in any significant operational impact on either junction.

Accordingly, no further traffic assessment is considered necessary in relation to the construction phase of the proposed development.

3. Conclusion

The response above intends to help to clarify the comment raised by the An Coimisiún Pleanála, regarding the estimated traffic flows during the construction stage, for the proposed 680MW Gas-Fired Generation Station at Kilshane Road, Kilshane, Finglas, Dublin 11.

Based on the assumed construction workforce, HGV activity, and anticipated traffic distribution across the surrounding road network, the assessment demonstrates that the additional traffic generated during the construction phase will result in traffic increases of less than 5% at the assessed junctions during both the AM and PM peak hours. Accordingly, the predicted impacts are considered negligible and are not expected to materially affect the operation or performance of the surrounding road network.

The traffic figures presented in the aforementioned assessment, and reproduced above, have been developed based on the experience and professional judgement of the engineers and transport specialists at Waterman Moylan Consulting Engineers. However, the appointed Contractor will be responsible for preparing the final Construction Traffic Management Plan, taking account of the proposed construction methodology, available resources, and the level of detail required by Fingal County Council, including its Roads, Planning and Environment Departments, Transport Infrastructure Ireland (TII), and any other relevant statutory authority.

Appendix 3: Landscape letter prepared by RMDA Landscape Architects

Kilshane Power Plant SID
Kilshane Road, Finglas, Dublin 11

Ronan Mac Diarmada & Associates

Landscape Architects & Consultants

RMDA
LANDSCAPE ARCHITECTS + CONSULTANTS

Cover Letter

October 2026



Ronan MacDiarmada + Associates Ltd.

Landscape Architects and Consultants
Newcastle, Co. Dublin

For the Client
Kilshane Energy Limited

Project No. 1961
Reg. Ref: SID/01/26

Introduction

Dear Sir/Madam,

Please find this cover letter in response to the comments raised by Fingal County Council in the Chief Executive's Report regarding the current Strategic Infrastructure Development application at Kilshane Road, Finglas, Dublin 11.

With regard to the comments relating to Existing Trees and Hedgerows, we confirm that the applicant will comply with the relevant requirements outlined in the report, should planning permission be granted, and subject to the conditions attached to any such permission.

We also confirm that there are no proposed changes to the previously consented approach to the retention and protection of existing hedgerows, as reflected in the landscape documentation submitted with the current application.



Ronan MacDiarmada.

Vat No. 6366166 H, Gort na Si, Newcastle, Co. Dublin.
Tel: (01) 412 4476. Email: info@rmda.ie

Appendix 4: Noise Technical Note prepared by AWN Consulting

TECHNICAL NOTE



Project : Kilshane Phase 2

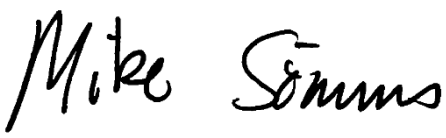
Subject : RFI – SID/01/26 Response

CLIENT	DOCUMENT REFERENCE	DATE
Kilshane Energy	257501.0374NR03	23 October 2026

DOCUMENT CONTROL SHEET

Document Control Sheet	
Our Reference	257501.0374NR03
Original Issue Date	23 October 2026
Client:	Kilshane Energy
Client Address:	Kilshane Road, Kilshane, Finglas, Dublin 1

Revision	Revision Date	Description

Details	Written by	Approved by
Signature		
Name	Justin Kwan	Mike Simms
Title	Senior Acoustic Consultant	Principal Acoustic Consultant
Date	23 October 2026	

Disclaimer
This report considers the specific instructions and requirements of our client. It is not intended for third-party use or reliance, and no responsibility is accepted for any third party. The provisions in this report apply solely to this project and should not be assumed applicable to other developments without review and modification.

ENVIRONMENT I.S. EN ISO 14001:2015 NSAI Certified
HEALTH & SAFETY I.S. ISO 45001:2018 NSAI Certified
QUALITY I.S. EN ISO 9001:2015 NSAI Certified

1. INTRODUCTION

AWN Consulting are the noise consultants for the Kilshane Energy project (Ref. SID/01/26) and prepared the noise chapter of the EIAR.

This document responds to an Additional Information request from the local authority in respect of the noise assessment.

This document has been prepared by Justin Kwan (Senior Acoustic Consultant). Justin graduated from the University of Leeds with a MEng, PhD (Mechanical Engineering). He is a member of the Institute of Acoustics (MIOA). He has been working in the field of acoustics since 2000 and has gain experience from projects in Asia and Ireland. He has extensive knowledge in the field of mechanical noise treatment, noise modelling and impact assessment for data centres and energy centres.

This document has been reviewed by Mike Simms (Principal Acoustic Consultant). Mike holds a BE and MEngSc in Mechanical Engineering and is a member of the Institute of Acoustics (MIOA). Mike has worked in the field of acoustics for 20 years. He has extensive experience in all aspects of environmental surveying, noise modelling and impact assessment for various sectors including, wind energy, industrial, commercial and residential.

2. COMMENTS AND RESPONSES

The Air and Noise Unit have the following comments in respect of this application:

We note that the application is for two additional gas turbines with an output of 340 Megawatts (MW) per turbine (Phase 2), in addition to the already permitted Gas Turbine Power Generation Station at Kilshane Road, Kilshane, Finglas, Dublin 11 (Phase 1).

The EIAR identified the nearest Noise Sensitive Locations, with background noise monitoring carried out in July 2025. Potential noise impacts on these noise receptors were examined for the construction phase and the operational phase of the proposed development.

Potential impacts from the construction phase were examined and found to be negative, not significant and short-term. These impacts could be mitigated by a condition requiring the submission of a Construction and Environmental Management Plan prior to commencement.

Potential impacts from the operational phase were examined in the EIAR, with power plant noise and additional vehicular traffic on public roads deemed to be the primary sources.

For the power plant noise, the applicant prepared a 3D computer-based noise prediction model to quantify the operational noise level associated with the proposed development.

In relation to the power plant, section 10.4.2.1 of the ElAR states that there are two modes in which the dual-fuel power plant can operate: (1) Gas fuel operation (2) Liquid fuel operation. The EIAR states that certain items of plant are relevant to only one mode: in gas fuel operation, the demineralised water pump, fuel oil pump and liquid fuel module do not operate; in liquid fuel operation, the fuel gas heater skid and separator skid do not operate. The EIAR states that these plant items will be installed within a building with sufficient sound insulation to ensure that their noise contribution will be insignificant, however it is not clear what acoustic specifications will be used for the proposed sound insulation. This should be clarified.

Section 10.4.2.2 of the EIAR looked at noise impacts during the night-time period, which are most sensitive, and found that the cumulative predicted impacts ranged from 'imperceptible' (no change) to 'not significant' (+1 dB) as per Table 10-16. However, it is not clear what operational mode these cumulative predictions refer to and if they are in respect of Phase 2 operation only, or Phase 1 and 2 operating simultaneously. This should be clarified.

Cumulative impacts were examined in more detail in section 10.7. In section 10.7.1, it was noted by the applicant that the existing ambient noise levels in the area were dominated by aircraft and road traffic noise from the local road network. It was also noted that 'At certain locations during night-time periods where existing background noise levels were measured in the range of 35 to 50 dB $L_{A90,15min}$, low levels of plant noise from the proposed development may be audible during lulls in other sources'. No further information has been provided to identify these locations and confirm if these are residential locations or not. This should be clarified, particularly the site(s) where 35dB was measured.

In section 10.7.3, the EIAR examined the cumulative impacts of various operational modes at the site, and found the following:

The cumulative impacts of both Phase 1 and Phase 2 for gas operation are predicted to range from 'imperceptible' (no change) to 'not significant' (+2dB) at Noise Sensitive Locations, as per Table 10-17.

The cumulative impacts of both Phase 1 and Phase 2 for liquid operation are predicted to range from 'imperceptible' (no change) to 'slight' (+3dB) at Noise Sensitive Locations, as per Table 10-18.

However, for both tables it is not stated if these are day-time or night-time impacts. This should be clarified.

Other related developments including an Above Ground Installation facility, a Gas Insulated Switchgear (GIS) facility, substation and grid connections, have been reviewed by the applicant for cumulative impacts, and significant cumulative noise impacts are not considered likely.

The EIAR confirms that all plant will be selected to ensure that no tonal or excessive low frequency noise emissions are evident at the Noise Sensitive Locations. The EIAR also states that noise from external plant will be minimised by purchasing low noise generating equipment and incorporating appropriately specified in-line attenuators for stacks and exhausts where necessary. A 12m high acoustic wall is proposed for each turbine to reduce noise levels at Noise Sensitive Locations. The length of this acoustic wall at each turbine should be clarified.

The proposed development is not expected to add a significant amount of additional traffic to the surrounding road network during operation, and any change in noise level is expected to be 'imperceptible'.

Section 2.2.2 of the EIAR confirms that the site is regulated by an existing EPA Industrial Emissions (IE) Licence (reference P1208-01), which sets out limits and monitoring requirements for various parameters including noise emissions from the Kilshane site. It is expected that a licence review will be required to reflect the design changes at the site resulting from the proposed development. The proposed development will be required to operate within the licensed emission limits set for the Kilshane site, including noise limits.

In respect of the above, our responses are as follows:

Local Authority Comment:

The applicant should dearly indicate which plant items will be installed within the sound insulated building. Further details on the building together with acoustic specifications of the sound insulation to be used in the building should also be provided.

AWN Response:

As per section 10.4.2.1 of Chapter 10 of the EIAR, the following plant items will operate and will be located within a sound insulated building under gas and liquid fuel operations. The relevant scenarios under which each of the internal plant items will operate is summarised below.

Plant Items within Building	**Operation under each scenario**	
	Gas Fuel Operation	**Liquid Fuel Operation**
Demineralised water pump	No	Yes
Fuel oil pump	No	Yes
Liquid fuel module	No	Yes
Fuel gas heater skid	Yes	No
Separator skid	Yes	No

The sound power levels for each of the listed items are provided in Table 10.A2.2 in Appendix 10.2. The building had been assumed to provide 20 dB sound reduction. This is a readily achievable sound insulation performance with a light-weight metal framed building.

As noise emission from plants associated with liquid fuel operation are higher than that from gas fuel operation, the most conservative scenario with liquid fuel operation has therefore been assumed within the noise impact assessment.

Local Authority Comment:

> *The applicant should clarify the locations where existing background night-time noise levels were measured in the range of 35 to 50 dB $L_{A90,15min}$, and where low levels of plant noise from the proposed development may be audible during lulls in other sources; The applicant should also clarify if these locations are residential or not.*

AWN Response:

There is a typographical error in Section 10.7.1 of Chapter 10 of the EIAR - the text should read:

"the existing background night-time noise levels were measured in the range of 34 to 60 dB $L_{A90,15min}$ at UN1 and 37 to 63 dB $L_{A90,15min}$ at UN2 during the night-time period. The average night-time noise level was 49 dB $L_{A90,8hr}$ at UN1 and 53 dB $L_{A90,8hr}$ at UN2"

The measured background noise levels were dominated by road traffic and aircraft noise, which is intermittent, therefore noise from the proposed development maybe audible during lulls in noise from traffic and aircraft. This will apply to all of the surrounding noise sensitive locations.

The nature of each of the receptors in the noise model is described in Table 10-13 of Chapter 10 of the EIAR. Receptor R01 is in commercial use and the remainder are residential.

Local Authority Comment:

> *The applicant should clarify the operating scenarios and time periods for all noise impact predictions presented in the report, including noise impact predictions presented in Tables 10-16, 10-17 and 10-18.*

AWN Response:

Normal operation of the Proposed Development had been assessed. As all plant items could operate anytime during day and night, the noise output will not vary over daytime or night-time periods when the plant is operational. From an impact assessment perspective therefore, the operational noise levels from the proposed development have been compared against the most stringent criteria, i.e. those for night-time periods. Compliance with the night-time criteria will ensure compliance with the daytime criteria. The assessment also compares the operational noise levels against the prevailing night-time background noise levels at surrounding NSLs to determine the increase in the noise environment. This presents the most conservative scenario as the existing noise environment is quietest at night.

Predicted noise levels in Table 10-16 are presented for phase 2 operation only. Note that there is an amendment following an RFI on Phase 1 (AWN Reference 257501.0374NR01), Table 10-17 and Table 10-18 should be combined as follows:

Table 2-1 Review of Cumulative Noise Impact – Gas / Liquid Operation

Location	Predicted dB $L_{Aeq,T}$		Background dB $L_{A90,15min}$ [a]	Cumulative [b] dB $L_{A90,15min}$	Change in Noise Level	EPA Glossary of Impacts
	Phase 1	Phase 2				
R01	41	44	49	51	+2	Not Significant
R02	42	43	49	51	+2	Not Significant
R07	38	37	53	53	0	Imperceptible
R08	38	38	53	53	0	Imperceptible

Location	Predicted dB $L_{Aeq,T}$		Background dB $L_{A90,15min}$ [a]	Cumulative [b] dB $L_{A90,15min}$	Change in Noise Level	EPA Glossary of Impacts
	Phase 1	Phase 2				
R09	38	37	53	53	0	Imperceptible
R10	42	41	53	54	+1	Not Significant
R11	41	39	53	53	0	Imperceptible
R12	39	43	53	54	1	Not Significant
R13	41	42	53	54	1	Not Significant
R14	36	39	53	53	0	Imperceptible
R15	35	38	49	49	0	Imperceptible
R16	35	39	49	50	+1	Not Significant

a. The background noise level relates to the night-time period.
b. The cumulative level is the logarithmic sum of the predicted noise level and the background noise level. Note that although the predicted noise level is presented in terms of $L_{Aeq,T}$ the constant operation of the source allows the combined $L_{Aeq,T}$ and $L_{A90,15min}$ to be presented as a cumulative $L_{A90,15min}$.

Local Authority Comment:

The applicant should clarify the length of the acoustic wall to be installed at each turbine location.

AWN Response:

- The noise barrier to the north of the north turbine is modelled as 130m in length
- The noise barrier to the north of the south turbine is modelled 110m in length

Both barriers are 12m in height.

Local Authority Comment:

All of the above is required to be completed by an appropriately qualified acoustician with the necessary acoustic training and experience, and the applicant is advised to seek specialist advice.

AWN Response:

Please see Section 1.0 of this response letter for details of the authors of the Chapter 10 and of this document.