



PLANNING REPORT FOR A SECTION 146B REQUEST

In respect of lands at
**Peamount Road, Milltown and
Clutterland, Co. Dublin**

Prepared on behalf of
Data & Power Hub Services Ltd

June 2026

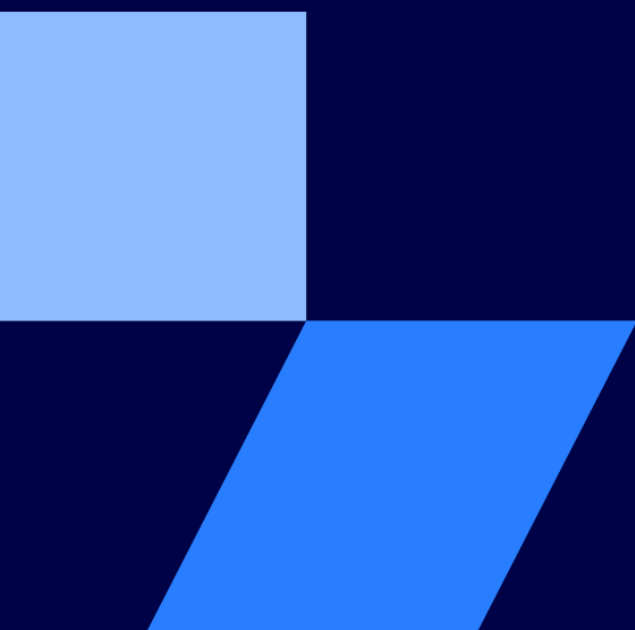


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1.0 INTRODUCTION AND EXECUTIVE SUMMARY

On behalf of the applicant Data & Power Hub Services Ltd, we wish to make a request to An Coimisiún Pleanála, pursuant to section 146B of the Planning & Development Act 2000 (as amended) for alterations to a Strategic Infrastructure (Electricity Transmission) Development permitted under ABP Reg Ref.: 309773-21 on the 9th of December 2021. The permitted development consists of the following:

“The proposed development primarily comprises the demolition of the existing two storey dwelling of Bulmer and associated outbuildings and stable building; and the provision of two no. 110kV transmission lines and a 110kV Gas Insulated Switchgear (GIS) substation compound and Transformers / MV switch room compound along with associated and ancillary works. The site of the proposed development has an area of c. 4.6 hectares, and the proposed development is described as follows:

The proposed 110kV GIS Substation and Transformers / MV control room compounds are to be located on lands to the south-east of the Power Generation Facility that was permitted under SDCC Reg. Ref. SD20A/0058 and to the north-west of the concurrent application for 2 no. two storey Information Communication Technology (ICT) facilities each with three storey plant levels and associated ancillary development that will have a gross floor area of 30,518sqm under SDCC Reg. Ref. SD20A/0324, and within an overall landholding bound to the south by the Peamount Road (R120); and on lands that contain the 2 no. residential properties of Little Acre and Bulmer as well as agricultural lands and buildings within the townland of Milltown, Newcastle, Co. Dublin.

The proposed demolition of the existing two storey dwelling of Bulmer and associated outbuildings and stable building to the front of the site. The existing Little Acre dwelling and associated buildings are permitted to be demolished under SDCC Reg. Ref. SD20A/0058.

The proposed 110kV Gas Insulated Switchgear (GIS) Substation Compound includes the provision of a two storey GIS Substation building (with a gross floor area of 1,430sqm) (known as the Peamount Substation), car parking, lighting, associated underground services and roads within a 3.0m high fenced compound, and all associated construction and ancillary works. The Transformers / MV switch room compound includes three transformers plus MV control room (200sqm), lighting and lightning masts, car parking, associated underground services and roads within a 3.0m high fenced and separate compound, and all associated construction and ancillary works.

Two proposed underground single circuit 110kV transmission lines will connect the proposed Peamount 110kV GIS Substation to the existing Castlebaggot-Kilmahud circuit to the east. The proposed transmission lines cover a distance of approximately 940m within the townlands of Milltown and Clutterland. They will pass outside of the site and along and under the following: R120, the former Nangor Road, Griffeen River and the newly realigned Baldonnel Road.

The development includes the connections to the proposed Peamount substation as well as to the Castlebaggot-Kilmahud circuit, as well as changes to the attenuation pond and landscaping permitted under SDCC Reg. Ref. SD20A/0058 and all associated construction and ancillary works.”

The proposed alterations being sought can be summarised as follows:

- Modifications to the permitted alignment of two 110kV underground transmission lines, Circuit 01 Left and Circuit 02 Right, between the GIS substation permitted under Reg. Ref. SD20A/0058 and the proposed connection points to the existing 110kV

Castlebaggot-Kilmahud circuit within the open field north-east of the Baldonnel Road / Old Nangor Road intersection.

- Realignment of the Horizontal Directional Drill (HDD) crossing under the Griffeen River and Baldonnel Road as a part of the proposed modifications.
- Change in the overall length of Circuit 01 from 946m to 991m.
- Change in the overall length of Circuit 02 from 938m to 977m.
- Slight amendments to the permitted GIS substation building including an increase in footprint from c. 48.1m x 14.88m to 43m x 15.88m, an increase in height from 14.9m to 16.7m, additional external stairs and updates to the general layout (to meet revised EirGrid specifications for substation buildings).

Section 146B of the Act provides for alteration by the Commission of strategic infrastructure development on request made of it. We have been advised by An Coimisiún Pleanála that proposed amendments to a previously permitted SID (Electricity Transmission) development should be sought under the provisions of section 146B of the Planning and Development Act 2000 (as amended). Therefore, an assessment of the proposed alterations under the provisions of section 146B is included in this Planning Report provided by JSA Planning, and accompanying Environmental Report prepared by AWN Consulting and Appropriate Assessment Screening Report and Ecological Technical Note prepared by Scott Cawley which informed the AWN report.

Under the terms of section 146B(2)(a) the Commission must decide as soon as practicable, whether or not the making of a proposed alteration would constitute *“the making of a material alteration of the terms of the development concerned”*. If the Commission decides that the alteration proposed would not constitute a material alteration, the Commission must proceed to alter the permission (section 146B(3)(a)).

Section 146B(4) provides that before making a determination under subsection (3)(b), the Commission shall determine whether the extent and character of the alteration requested, were it to be made, would be likely to have significant effects on the environment.

As set out in this report and as demonstrated by the accompanying drawings it is submitted that the proposed alterations are not material and are unlikely to have significant effects on the environment as they comprise of only minor alterations to the permitted alignment of the two 110kV transmission line cables and permitted GIS substation building. This is further supported by relevant precedents set out within the following sections of this report.

We therefore respectfully request, as set out herein, that the Commission decide that the making of the alterations subject of this request do not constitute the making of a material alteration of the terms of the substation and electricity transmission lines development as granted permission.

However, if the Commission decides that the proposed alterations are material, we wish to refer the Commission to Section 5 of this Report and to the accompanying Environmental Report prepared by AWN Consulting which sets out the main environmental issues in relation to the proposed alterations. The topics in the original Environmental Impact Assessment Report are reviewed in the context of the proposed alterations. It is considered that the proposed alterations could not reasonably be expected to have any significant effects on the environment and that they would not result in any significant impact on any European Site.

The alterations which are now sought have arisen on foot of the detailed design of the permitted electricity transmission lines at post-planning stage, and based on the detailed requirements of EirGrid and their recently updated design specifications for substation buildings. The proposed amendments to the alignment of the transmission lines along the

internal access road of the wider development site and along Peamount Road (R120) are largely due to co-ordination of the route with existing and proposed services, while the proposed realignment of the HDD crossing under the Griffeen River and Baldonnel Road is due to presence of existing services within Baldonnel Road that need to be avoided. Despite these proposed changes, the route of the transmission line cables remains very similar to the permitted route.

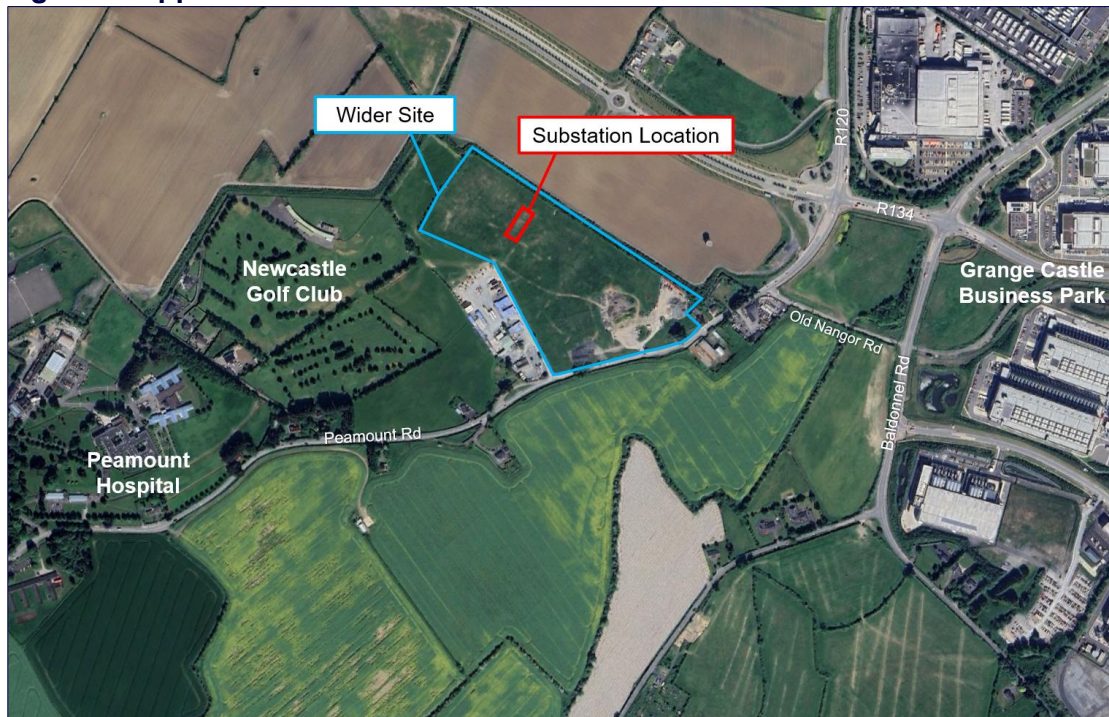
The alterations to the permitted cable alignment do not result in any material change to the function, construction methodology, or design of the permitted development, and will not result in any change to the conclusions or mitigation measures already provided for the development within the EIAR and AA Screening Report submitted with the original application.

2.0 SITE LOCATION AND CONTEXT

The permitted development to which the current alterations relate comprises a 110kV substation with Gas Insulated Switch Gear (GIS) substation and two 110kV underground transmission line cables (connecting the substation to the existing 110kV underground Castlebaggot - Kilmahud circuit) within the townlands of Milltown and Clutterland, Co. Dublin.

The 110kV GIS substation and two 110kV underground transmission lines were approved by An Bord Pleanála under ABP. Reg. Ref. 309773-21 on the 9th of December 2021.

Figure 1: Approximate Location of Permitted Substation



The permitted substation is located within a larger landholding approximately 1.6ha in size, to the north-west of Peamount Road (120), and north-east of Newcastle Golf Club and Peamount Hospital, upon which there is also a permission for a power plant as granted under SDCC Reg. Ref. SD20A/0058 and an ICT facility as granted under SDCC Reg. Ref. SD20A/0324. Further details of these permitted developments are provided in section 3 of this report. The permitted substation is located between the permitted energy centre and ICT facility.

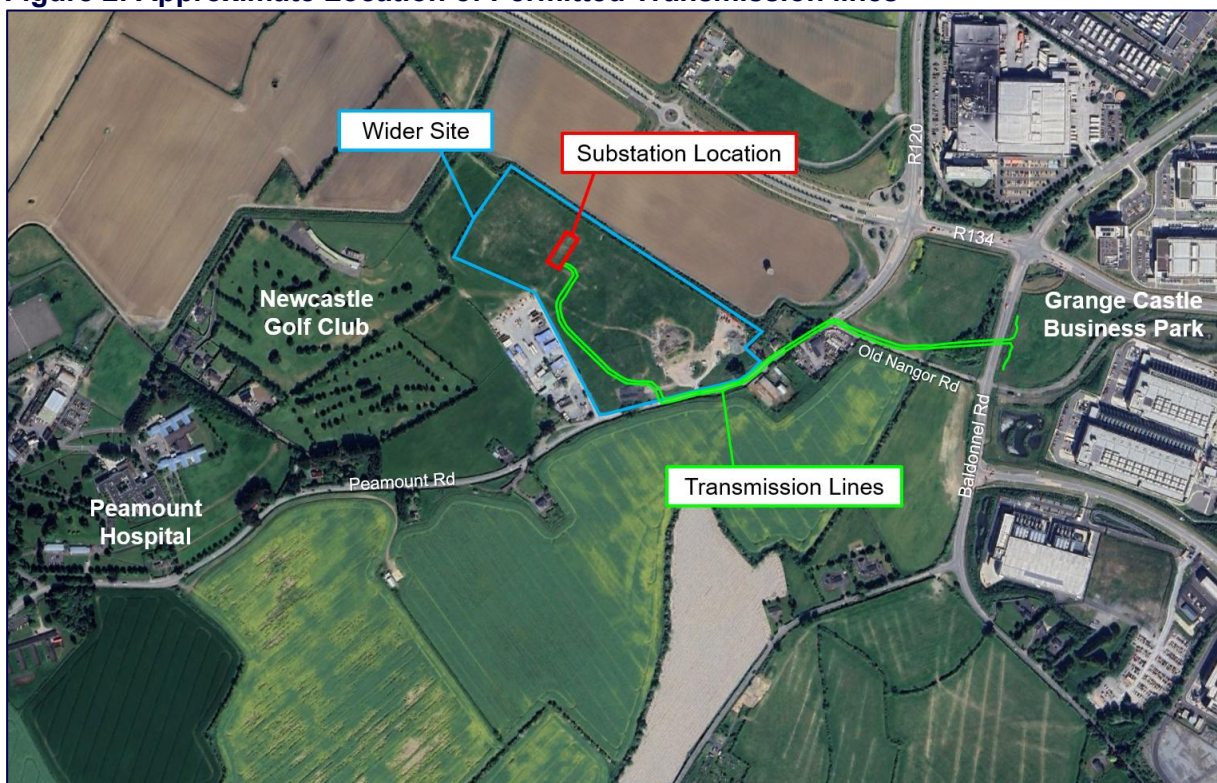
The lands surrounding the larger site are mostly agricultural in nature. However, immediately adjoining the wider site to the south-west is hardstand area, with Newcastle Golf Club and Peamount Hospital further south-west of the site again as seen in Fig. 2-1 below. The lands further east of the wider site comprise a cluster of large-scale business parks and ICT facilities.

The N4 is approximately 4km north (approx. 7-minute drive) of the site and the N7 is approximately 7km south (approx. 10-minute drive) of the site.

The route of the permitted 110kV underground transmission lines proceeds from the site of the permitted substation and travels south-east towards Peamount Road along the permitted internal access road to the energy centre granted under SDCC Reg. Ref. SD20A/0058. The route continues to run north-eastwards under Peamount Road for approximately c.300m until it reaches the junction with Old Nangor Road, and continues eastwards under the Old Nangor Road before cutting north-east through the adjacent greenfield area. Finally, the route travels eastwards under the culverted Griffeen River and Baldonnell Road to where it joins the existing Castlebaggot-Kilmahud circuit on the eastern side of the Baldonnell Road.

The permitted cable route is approximately c.940m.

Figure 2: Approximate Location of Permitted Transmission lines



3.0 RELEVANT PLANNING HISTORY

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

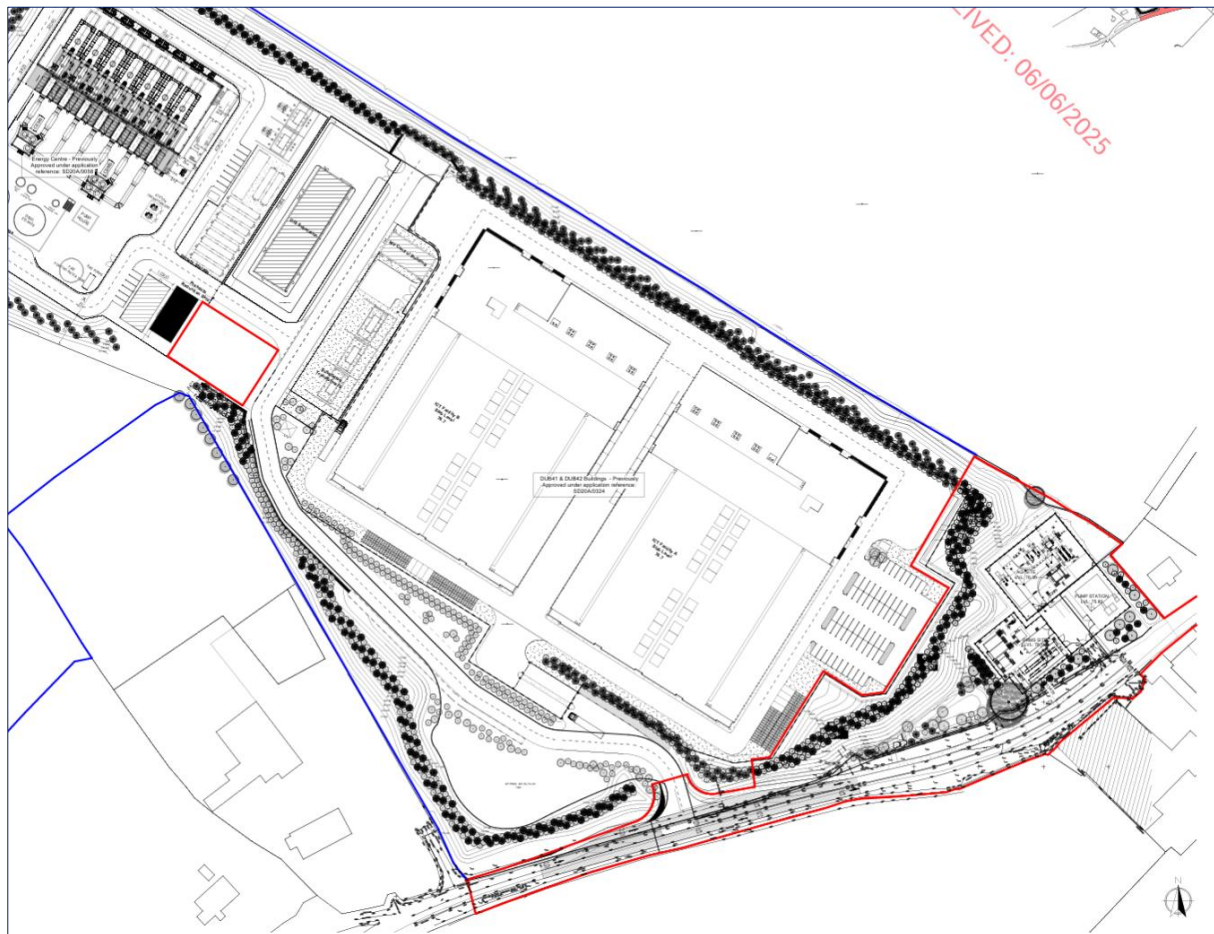
4.0 PERMISSION FOR AGI & PRMS COMPOUND – SDCC REG. REF. SD25A/0135W

On the 20th November 2025, a final grant of permission, subject to 21 conditions, was issued by South Dublin County Council for a development described as follows:

“The development will consist of the omission of a permitted above ground installation (AGI) compound under Reg. Ref.: SD20A/0058, the provision of an AGI at an alternate location within the site, and the provision of a Pressure Reduction Metering System (PRMS) and a foul pumping station, along with road upgrades to the public road (R120 Peamount Road), and provision of a foul sewer connection from the site to the northeast, via Peamount Road and Old Nangor Road. The relocated AGI, PRMS compound, and foul pumping station will be located in the southeastern corner of the site. It is proposed to demolish an existing two storey vacant house (with a gross floor area of 235 sq.m.) to provide for the AGI, PRMS compound, and foul pumping station. The relocated Gas AGI and the PRMS will be located within fenced compounds and will comprise of the following buildings and gas-related infrastructure: - 2 no. AGI buildings comprising AGI Building 1 with a total area of c.18 sq.m and overall height of c. 3.4m and AGI Building 2 with a total area of c. 8 sqm and overall height of c. 3.1m; - A Boiler House Kiosk with a total area of c. 12 sq.m and overall height c. 3.5m and boiler flues with a total height c. 5.4m; - A new E&I Kiosk with a total area of c. 12 sq.m and overall height of c. 2.7m; - A new Control Room with a total area of c. 12 sq.m and overall height of c. 3m; - A new Skid House with a total area of c. 123 sq.m and overall height of c. 3.3m; - The compounds will also accommodate associated valves and pipework. A new foul water pumping station with associated chambers, meters and a 24-hour storage tank will be provided to the east of the AGI and PRMS compounds. The proposed development includes all associated and ancillary works including site lighting, boundary treatments, landscaping, drainage and infrastructure. The proposed development is located within a site subject to an application for an EPA Industrial Emissions (IE) Directive license.”

A site layout plan of the application is shown below:

Figure 3: Site Layout Plan Reg. Ref.: SD25A/0135W



4.1 PERMISSION FOR ENERGY CENTRE – SDCC REG. REF. SD20A/0058

On the 17th of December 2020, a final grant of permission, subject to 19 conditions, was issued by South Dublin County Council for a development described as follows:

“Demolition of the existing single storey house of 'Little Acre' and its associated garage and other buildings; demolition of the single storey stable building on the overall site; construction of a gas powered Power Plant with all its associated elements; the part single and part two storey property of Bulmer and an agricultural building to the east of the overall site will not be demolished; The Power Plant compound of 14,475sq.m will contain 2 Power Units each with 1 25m height stack (2 overall), transformers, air intakes and electrical modules; the Power Plant compound will also contain a two storey administration and workshop building (427sq.m) and LV switchgear building (140sq.m) (567sq.m in total) plus an AGI connection, gas compressor, water tank, water treatment, firewater tank and pumps, fuel skids, fuel tank and 1 emergency diesel generator; the proposal also includes a battery energy storage system compound of 3,300sq.m containing 15 battery containers and 15 inverters that will be linked to the Power Plant; the development will be accessed from a new vehicular entrance from Peamount Road that will provide access to the Power Plant at the rear of the site; all ancillary site development works, including attenuation pond and dry swales to connect to existing infrastructural services and network as well as fencing, signage, services road entrance gate and 8 car parking spaces; the development will be enclosed with landscaping to all frontages; an EPA-Industrial Emissions Directive (IED) licence will be applied for to

facilitate the operation of the proposed development for a period of 10 years on a site of 8.2 hectares on lands that contain the 2 residential properties of 'Little Acre' and 'Bulmer'."

A site layout plan of the application is shown below:

Figure 4: Site Layout SDCC Reg. Ref. SD20A/0058



4.2 PERMISSION FOR ICT FACILITIES – SDCC REG. REF. SD20A/0324

On the 22 July 2021, a final grant of permission was issued by South Dublin County Council for the following development:

“Demolition of existing two storey dwelling of 'Bulmer' and associated outbuildings and demolition of the existing single storey house of 'Little Acre' and its associated garage and other buildings; demolition of single storey stable building on the overall site; construction of 2 two storey Information Communication Technology (ICT) facilities each with three storey plant levels and associated ancillary development which will have a gross floor area of 30,518sq.m on an overall site of 8.2 hectares; 1 two storey ICT facility (building A) will be located to the south-east of the site and will have a gross floor area of 15,196sq.m including 18 emergency generators located at ground and first floor level within a compound to the north-eastern side of the ICT facility with associated flues that will be 25m in height and will be grouped in four groups of four and 1 group of two flues (18 flues overall); 1 two storey ICT facility (building B) will be located to the north-west of Building A and centrally within the overall site and will have a gross floor area of 15,196sq.m including 18 emergency generators located at ground and first floor level within a compound to the north-eastern side of the ICT facility with associated flues that will be 25m in height and will be grouped in four

4.3 PERMITTED GIS SUBSTATION AND UNDERGROUND TRANSMISSION LINES TO WHICH ALTERATIONS RELATE – ABP REG. REF. 309773

On the 23rd of March 2021, a Strategic Infrastructure (Electricity Transmission) Development Application for approval was lodged with An Bord Pleanála and granted on 9th December 2021. The proposed development included the following:

“The proposed development primarily comprises the demolition of the existing two storey dwelling of Bulmer and associated outbuildings and stable building; and the provision of two no. 110kV transmission lines and a 110kV Gas Insulated Switchgear (GIS) substation compound and Transformers / MV switch room compound along with associated and ancillary works. The site of the proposed development has an area of c. 4.6 hectares, and the proposed development is described as follows:

The proposed 110kV GIS Substation and Transformers / MV control room compounds are to be located on lands to the south-east of the Power Generation Facility that was permitted under SDCC Reg. Ref. SD20A/0058 and to the north-west of the concurrent application for 2 no. two storey Information Communication Technology (ICT) facilities each with three storey plant levels and associated ancillary development that will have a gross floor area of 30,518sqm under SDCC Reg. Ref. SD20A/0324, and within an overall landholding bound to the south by the Peamount Road (R120); and on lands that contain the 2 no. residential properties of Little Acre and Bulmer as well as agricultural lands and buildings within the townland of Milltown, Newcastle, Co. Dublin.

The proposed demolition of the existing two storey dwelling of Bulmer and associated outbuildings and stable building to the front of the site. The existing Little Acre dwelling and associated buildings are permitted to be demolished under SDCC Reg. Ref. SD20A/0058.

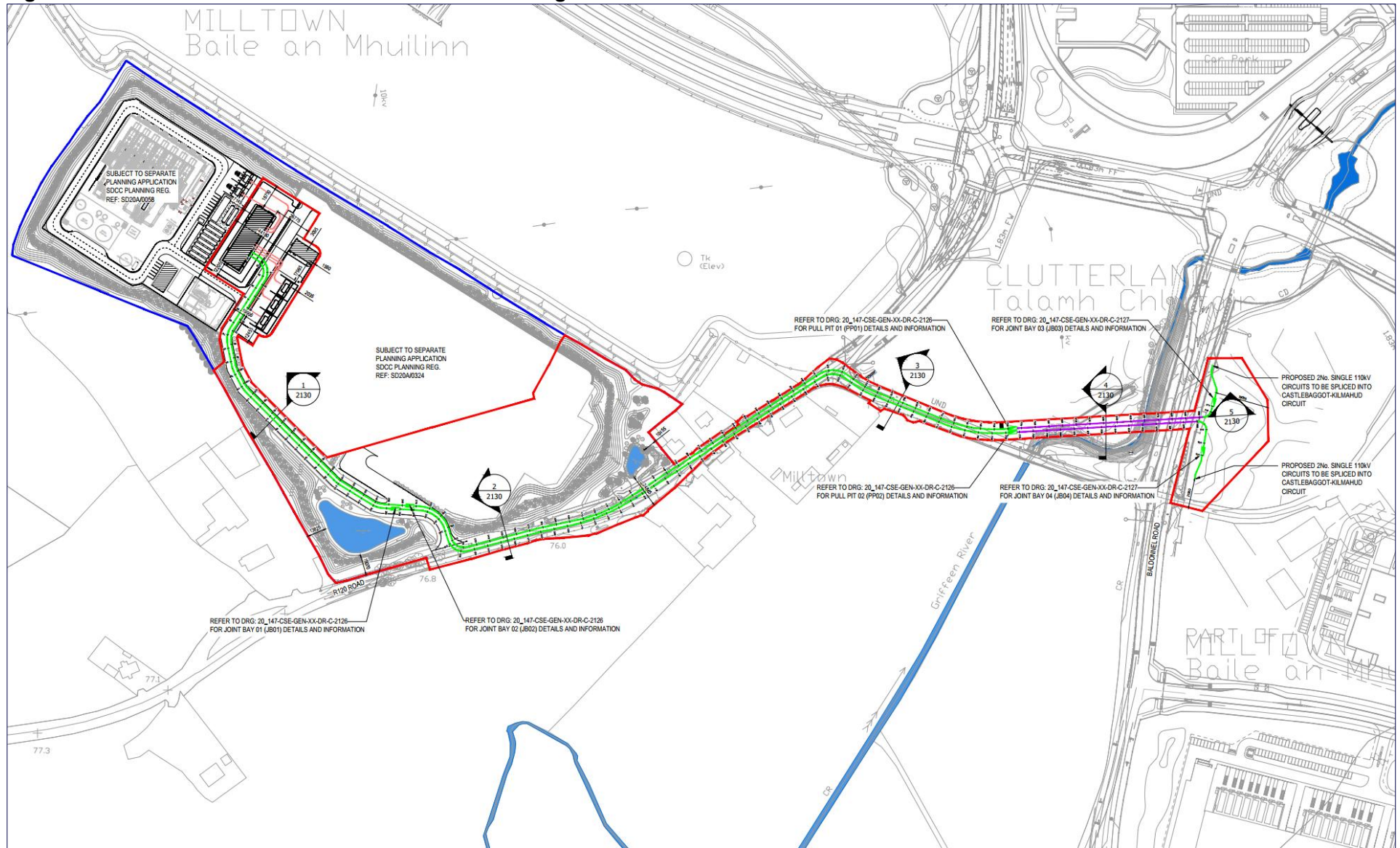
The proposed 110kV Gas Insulated Switchgear (GIS) Substation Compound includes the provision of a two storey GIS Substation building (with a gross floor area of 1,430sqm) (known as the Peamount Substation), car parking, lighting, associated underground services and roads within a 3.0m high fenced compound, and all associated construction and ancillary works. The Transformers / MV switch room compound includes three transformers plus MV control room (200sqm), lighting and lightning masts, car parking, associated underground services and roads within a 3.0m high fenced and separate compound, and all associated construction and ancillary works.

Two proposed underground single circuit 110kV transmission lines will connect the proposed Peamount 110kV GIS Substation to the existing Castlebaggot-Kilmahud circuit to the east. The proposed transmission lines cover a distance of approximately 940m within the townlands of Milltown and Clutterland. They will pass outside of the site and along and under the following: R120, the former Nangor Road, Griffeen River and the newly realigned Baldonnel Road.

The development includes the connections to the proposed Peamount substation as well as to the Castlebaggot-Kilmahud circuit, as well as changes to the attenuation pond and landscaping permitted under SDCC Reg. Ref. SD20A/0058 and all associated construction and ancillary works.”

As will be set out in further detail hereafter, the alterations now sought are not considered to represent a material alteration to the terms of the development as permitted.

Figure 3.3: Permitted Substation & Grid Route ABP Reg. Ref. 309773-21



5.0 DESCRIPTION OF PROPOSED ALTERATIONS

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

The proposed alterations to the Strategic Infrastructure Development, which this Section 146B relates to, can be summarised as minor amendments to the permitted alignment of the two 110kV underground transmission lines, referred to as Circuit 01 Left and Circuit 02 Right, to coordinate the lines with existing and proposed services. Details of the proposed alterations are set out in further detail below.

In the proposed alterations, Circuit 01 Left largely follows the permitted alignment from the permitted GIS substation traversing south-east along the route of the internal access road of the wider site permitted under SDCC Reg. Ref. SD20A/0058, before continuing north-east along the R120 (Peamount Road) for approximately 300m, then continuing south-east along the Old Nangor Road, with minor amendments to the alignment to avoid existing and proposed services along the internal access road and the R120 (Peamount Road). The proposed route alignment then veers north of the permitted route alignment and crosses under the Griffeen River and Baldonnell Road via horizontal directional drill (HDD) before performing a 180° ‘U-bend’ to connect to the existing Castlebaggot-Kilmahud circuit in the permitted location.

The proposed alterations to Circuit 02 Right largely mirror the proposed alterations Circuit 01 Left, with minor amendments to the alignment along the internal access road of the wider site and the R120 (Peamount Road), before veering north of the permitted alignment through greenfield and crossing under the Griffeen River and Baldonnell Road via HDD before performing a 180° ‘U-bend’ to connect to the Castlebaggot-Kilmahud circuit in the permitted location.

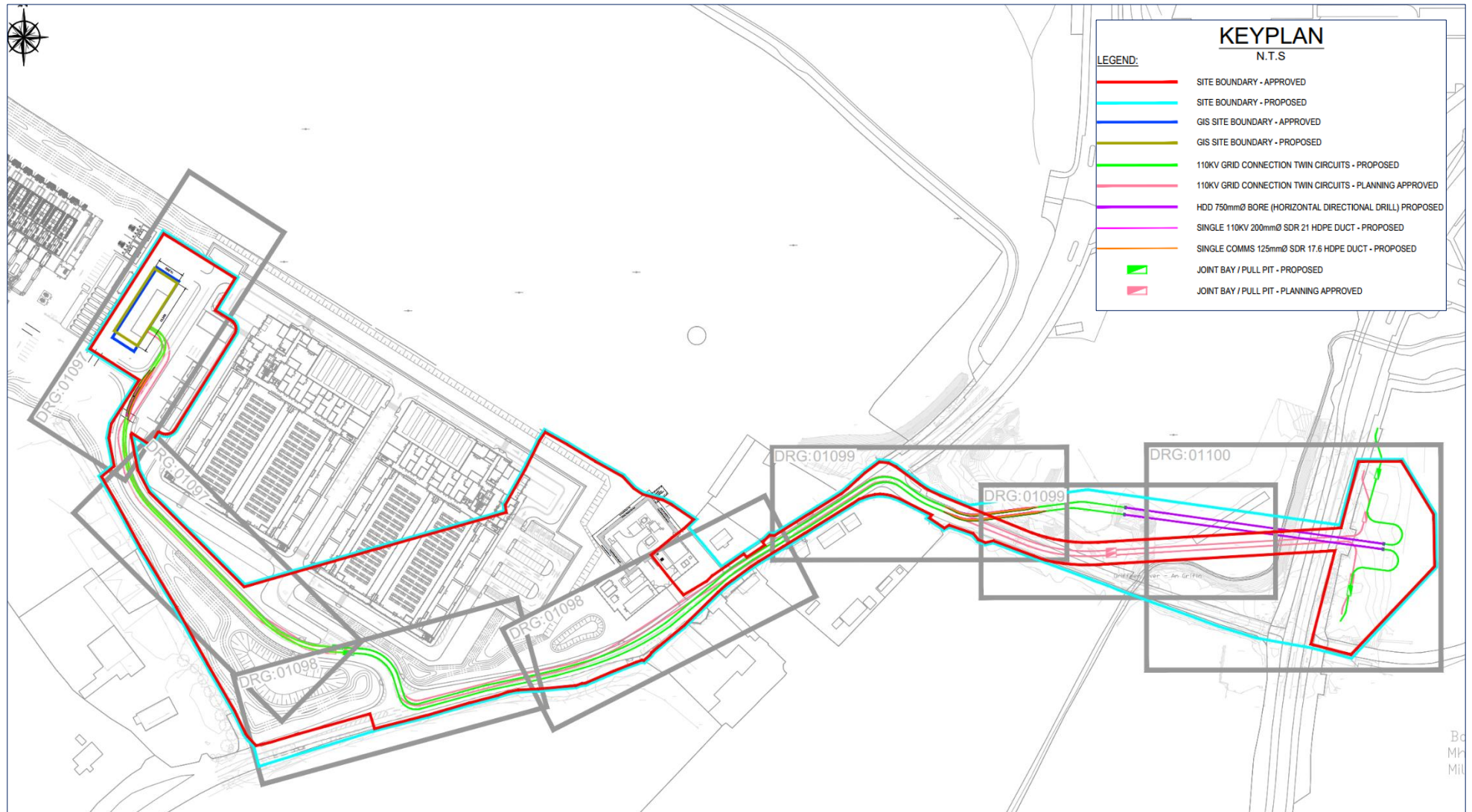
A summary of the permitted and proposed circuit lengths are set out below:

Description	Permitted	Proposed
Circuit 01 Left length	946m	991m
Circuit 02 Right length	938m	977m
HDD Circuit 01 Left Crossing length	168m	143m
HDD Circuit 02 Right Crossing length	168m	143m
Joint Bays Circuit 01 Left	3 no. joint bays	3 no. joint bays
Joint Bays Circuit 02 Right	3 no. joint bays	3 no. joint bays

Minor amendments are also proposed to the GIS substation building in order to meet EirGrid requirements (which have arisen recently and following the approval of the development), these include:

- A change in the overall footprint from c.48.1m x c.14.88m to c.43m x c.15.88m;
- Building height increase from c.14.94 m to c.16.7m;
- A change to the building façade to have a monotone colour for the building in line with the material palette of the wider campus;
- Addition of external stairs from the first floor for fire escape and Part B compliance
- Minor adjustments to doors, vents and general finish of the building
- Updates to the internal layout of the GIS substation building;
- Adjustment of the palisade fence and boundary treatments;
- General updates to ducting, lighting, interface kiosks and rural supply

Figure 6: Overall Layout Plan of Proposed Alterations



5.1 RATIONALE FOR PROPOSED ALTERATIONS

The proposed amendments are primarily sought to ensure appropriate coordination with existing and proposed services along the internal access road, R120 (Peamount Road) and Baldonnell Road. The alterations to the substation building have arisen based on recently updated EirGrid specifications for such buildings.

The alterations, when considered individually or cumulatively, are not considered to constitute the making of a material alteration to the terms of the existing planning permission.

5.2 RELEVANT PRECEDENTS

It is noted that there are relevant precedents for similar changes and more significant alterations to permitted s. 182 Electricity Transmission SID developments being considered immaterial by An Bord Pleanála (An Coimisiún Plenala). Previous precedents have included the movement of transmission line alignments, and changes resulting in the alignment of cables falling outside of the original application red line boundary.

Three such examples are provided below, and it is respectfully requested that the Commission have regard to these relevant precedents when considering the minor alterations sought to the subject approved Electricity Transmission SID.

ABP Reg. Ref.: 323812

Alterations were sought to previously approved 220Kv Gas Insulated Switchgear (GIS) substation on lands at Kilshane Road, Kilshane, Finglas, Dublin 11 and a 220kV transmission line connection to the existing 220kV Cruiserath substation.

Minor alterations to the location and design of the substation compound were also sought to align with the detailed design phase. These minor alterations included the size of the substation compound and the omission of 2 no. previous permitted parking spaces to align with EirGrid specifications.

The Board considered that the proposed alterations did not constitute a Material Alteration. This alteration included the relocation of the permitted 200kV Gas Insulated Switchgear and structures approximately c. 10m to the north and c.3m to the west and reduced the size of the substation compound to c. 1,767 sq.m.

ABP Reg. Ref.: VM0009

Alterations were sought to previously approved development of the Clashavoon to Dunmanway 110kV overhead line in 2015. The alterations consisted of alterations to the permitted cable route, including movement of permitted pole-sets. The alterations affected numerous stretches of the overall route, and a significant number of pole-sets.

The Board considered that the alterations did not constitute a Material Alteration (a decision which was also supported by the Board's Inspector). This alteration included movement of the permitted alignment up to 54 metres.

ABP Reg. Ref.: VM0006

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

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

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

The Board’s Inspector concluded that the alterations sought did not comprise a Material Alteration. The Board duly altered the terms of the permission.

It is respectfully submitted that both of the foregoing alteration requests pertained to changes to permitted electricity transmissions developments that were generally similar in nature to those now sought to the subject transmission lines in on our site located within the townlands of Milltown and Clutterland, Peamount Road, Newcastle, Co. Dublin. It is respectfully requested that the Commission have regard to these precedents in finding that the alterations now proposed are not material.

6.0 ASSESSMENT UNDER 146B OF THE PLANNING AND DEVELOPMENT ACT 2000 (AS AMENDED)

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

Under the terms of section 146B(2)(a) the Commission must decide as soon as possible, whether or not the making of a proposed alteration would constitute *“the making of a material alteration of the terms of the development concerned”*. If the Commission decides that the alteration proposed would not constitute a material alteration, the Commission must proceed to alter the permission (section 146B(3)(a)).

Section 146B(4) provides that before making a determination under subsection (3)(b), the Board shall determine whether the extent and character of the alteration requested under subsection, were it to be made, would be likely to have significant effects on the environment.

6.1 CONSIDERATION OF MATERIALITY

As noted above, the first consideration in relation to this request for alterations to the Strategic Infrastructure Development (SID) approved under ABP Reg Ref.: 309773 is to determine if the making of the alteration would constitute the making of a material alteration of the permitted SID development. This will be assessed hereunder having regard to the proposed alterations outlined in Section 4 above and to the consideration of the impact on

the environment arising from the alterations (or lack thereof) set out in the accompanying Environmental Report prepared by AWN.

As noted above, the alterations consist of the following:

- Modifications to the permitted alignment of two 110kV underground transmission lines, referred to as Circuit 01 Left and Circuit 02 Right, between the GIS substation permitted under Reg. Ref. SD20A/0058 and the proposed connection points to the existing 110kV Castlebaggot-Kilmahud circuit within the open field north-east of the Baldonnell Road and Old Nangor Road intersection.
- Realignment of the HDD crossing under the Griffeen River and Baldonnell Road as a part of the proposed modifications.
- Change in the overall length of Circuit 01 Left from 946m to 991m.
- Change in the overall length of Circuit 02 Right from 938m to 977m.
- Minor amendments to the permitted GIS substation building including the footprint, increase in height by c. 1.8m, external finishes, internal layout and updates to boundary treatments, lighting poles and associated development.

The alignment of both Circuit 01 Left and Circuit 02 Right remains generally the same as in the permitted development, with the greatest deviation from the permitted route proposed on the eastern side of the Baldonnell Road where both transmission lines extend slightly further east before making a 180° 'U-turn' to join the Castlebaggot-Kilmahud circuit to the north and south respectively.

The realignment of the Horizontal Directional Drilling (HDD) crossing under the Griffeen River and Baldonnell Road results in a slightly increase in the overall length of the proposed circuit, however the proposed changes decrease the total length of the HDD. The proposed changes to the HDD crossing do not alter the permitted associated mitigation measures and ensures potential impacts, as previously identified, are appropriately managed and mitigated.

The proposed amendments to the permitted GIS substation buildings are minor in nature and are not considered to be material. The proposed amendments do not have an impact on the functioning and operation of the substation and will remain as permitted under ABP Reg. Ref.: 309773. Moreover, the substation is set in the centre of a permitted ICT Facility and energy generation campus, where it is effectively screened from the public road and will not impact on any third party in any way materially.

As set out below, the proposed alterations will not result in a material change to the construction, or operation of the development and it is envisaged that there will be no change to the environmental impact of proposed amended development in comparison with the permitted development.

In summary it is considered that the proposed alterations do not constitute a material change to the scheme as permitted under ABP Reg. Ref.: 309773.

6.2 ENVIRONMENTAL ASSESSMENT

As noted herein, section 146B(4) of the 2000 Act provides that before making a determination under subsection (3)(b), the Commission shall determine whether the extent and character of the alteration requested are such that the alteration, were it to be made, would be likely to have significant effects on the environment.

An Environmental Report prepared by AWN Consulting reviewed the potential environmental impacts of the proposed amendments in comparison to the permitted development, in line

with the key areas assessed in the original Environmental Impact Assessment Report (EIAR) prepared by Martson Planning Consultancy. It is considered that the proposed alterations could not reasonably be expected to have any significant effects on the environment, either alone or when considered cumulatively.

This section sets out the main environmental issues in relation to the proposed alterations as noted within the accompanying Environmental Report prepared by AWN Consulting. It is considered that the proposed alterations could not reasonably be expected to have any significant effects on the environment, either alone or when considered cumulatively.

The Report for the purposes of Appropriate Assessment Screening prepared by Scott Cawley also sets out that the proposed alterations are insignificant in the context of potential ecological impacts and will not result in any likely significant effect on any European Site.

Table 6.1: Topics from Environmental Impact Assessment Report (EIAR) for the Permitted Strategic Infrastructure Development

Table 5.1: Topics from Environmental Impact Assessment Report (EIAR) for the Permitted Strategic Infrastructure Development		
Chapter	Title	Content
5	Population and Human Health	The impact to populations and human health from the Proposed Realignment remains the same to those presented in the EIAR Chapter 5 (Population and Human Health) with a not significant quality and short-term duration.
6	Biodiversity	The amendments are limited to changes in the precise alignment of the transmission route through similar habitats, with no difference in the nature or extent of habitat loss previously assessed, and no additional ecological constraints identified during the 2026 verification survey. Approved mitigation measures, including those relating to habitat loss, protected species, surface water protection and the HDD crossing of the Griffeen River, remain valid and sufficient to ensure that the proposed amendments will not give rise to any significant residual effects on Key Ecological Receptors at any geographic scale. The proposed realignment of the underground transmission lines is therefore considered minor and will not materially alter the impacts on biodiversity identified in the EIAR.
7	Land, Soil, Geology and Hydrogeology	The proposed realignment of the underground transmission lines is considered minor and will not materially change the identified impacts on lands, soils, geology and hydrology from those identified in the EIAR for the permitted development. The best practice measures outlined in the CEMP, along with the mitigation measures detailed in Section 7.63 of the EIAR, will be implemented for the Proposed Realignment.
8	Hydrology	The proposed changes will not materially alter the identified hydrological impacts outlined in the original EIAR. The best practice measures outlined in the CEMP, along with the mitigation measures detailed in Section 8.51 of the EIAR, will be implemented for the proposed realignment. The proposed changes to the alignment of the HDD crossing of the Griffeen River do not alter the instream works and all associated mitigation measures as proposed in the original EIAR remain unchanged, ensuring that

Table 5.1: Topics from Environmental Impact Assessment Report (EIAR) for the Permitted Strategic Infrastructure Development

Chapter	Title	Content
		potential impacts on the streambed, banks, water flow, and water quality are appropriately managed and mitigated.
9	Noise and Vibration	No new noise sensitive receptors have been identified as a result of the proposed changes, and the proposed modified transmission line route does not bring construction works close to the identified sensitive receptors. As the proposed changes will not impact the proximity of the proposed works to sensitive receptors, no additional noise or vibration will be generated. The proposed modified route of the transmission lines will not materially change the identified noise impacts outlined in the original EIAR and no additional mitigation measures beyond those previously set out in the EIAR will be required.
10	Air Quality and Climate	No new sensitive receptors have been identified as a result of the Proposed Realignment, and the realignment does not bring construction works closer to the identified sensitive receptors. The proposed development was assessed as having a low risk of dust soiling impacts and negligible risk of dust-related human health risk during construction phase, the proposed amendment will not alter this. The overall sensitivity of the area will not change from what has been previously assessed. In sum, the proposed amendments will not materially change the identified impacts to air quality outlined in the original EIAR and the previously envisaged construction methods and mitigation measures will remain unchanged from the original submission. In relation to climate, the proposed amended development will not result in any significant changes in the quantities of materials or construction activities and therefore will not result in a material change to the identified impacts of the original proposed development. The construction methods and mitigation measures remain unchanged from the original submission,
11	Landscape and Visual Impact Assessment	As the proposed transmission lines are underground the proposed changes will not result in landscape or visual impact. The effects will be same as in the original application and the mitigation measures for the construction phase will remain as in the original application.
12	Traffic and Transportation	The proposed amended development will not result in any material changes to the previous assessment of traffic and transportation. No additional mitigation measures are required beyond those identified in the original application.
13	Cultural Heritage	No additional mitigation measures beyond those already specified in Chapter 13 (Cultural Heritage) of the original application. The predicted effect on Archaeological, Architectural and Cultural heritage from the overall development will remain unchanged.
14	Waste Management	The impacts and mitigation are as outlined in the EIAR submitted with the original planning application. There are no additional material asset impacts as a result of the proposed realignment.

Table 5.1: Topics from Environmental Impact Assessment Report (EIAR) for the Permitted Strategic Infrastructure Development

Chapter	Title	Content
15	Material Assets	The proposed amended development will ensure the underground transmission lines do not conflict with existing or future utilities infrastructure. No additional mitigation measures are necessary beyond those already specified in Chapter 15 of the original EIAR. The predicated effects during the construction phase remain consistent with the original submission and no impacts are anticipated during the operational phase.
16	Interactions	The AWN assessment concludes that the Proposed Realignment will not introduce or alter any interactions and inter-relationships between environmental factors that have been considered within Chapter 16 (Interactions) of the EIAR. Chapter 16 considered that there is no significant impact from Interaction as a result of the Original Submission, and hence there is no likelihood of significant effects on the environment arising from the interactions associated with the Proposed Realignment.

6.3 CONCLUSION OF ASSESSMENT

Having regard to the above and the requirements of section 146B(4) of the 2000 Act it is considered that the extent and character of the alterations requested are such that the alterations, were they to be made, would be unlikely to have significant effects on the environment.

It is considered no new considerations arise in relation to impacts on the environment which were not considered in the assessment of impacts for the original SID application which was subject to a grant of permission by An Bord Pleanála.

7.0 APPROPRIATE ASSESSMENT

A Report for the Purposes of Appropriate Assessment Screening prepared by Scott Cawley accompanies this application, it concludes:

Following an examination, analysis and evaluation of all relevant information and in view of the best available scientific knowledge available, and applying the precautionary principle, it can be concluded that the possibility of any significant effects on any European sites, in the absence of mitigation measures, whether arising from the proposed amendments to the consented development alone or in combination with other plans and projects, can be excluded, for the reasons set out in Section 3.4 above.

In reaching this conclusion, the nature of the proposed amendments to the consented development and its potential relationship with all European sites within the zone of influence, and their conservation objectives, have been fully considered.

Therefore, it is the professional opinion of the authors of this report that the proposed amendments to the consented development do not require a Stage Two Appropriate Assessment or the preparation of a Natura Impact Statement (NIS).

We refer to the Appropriate Assessment Screening Report for further details.

8.0 SUMMARY AND CONCLUSIONS

This Planning Report has been prepared to accompany a request to An Coimisiún Pleanála, pursuant to section 146B of the Planning & Development Act 2000 (as amended) for alterations to the Strategic Infrastructure Development permitted under ABP Reg Ref.: 309773 which was granted permission on the 9th of December 2021.

The proposed alterations relate to changes to the alignment of the permitted underground transmission lines, which will not have any visibility above ground, and which do not change the design or implementation of the permitted development materially. Similarly, the proposed alterations to the approved substation building are minor and are not material either in a planning or environmental sense.

As set out in this report and as demonstrated by the accompanying drawings and File Note prepared by CSEA, Environmental Report prepared by AWN Consulting and Appropriate Assessment Screening Report and Ecological Technical Note prepared by Scott Cawley, it is considered that the proposed alterations are not material and are unlikely to have any significant effect on the environment, given the limited nature, size and scale of alterations proposed, and the location of the proposed alterations.

It is submitted that none of the alterations sought introduce new or additional material planning or environmental considerations other than those already assessed under the extant permission.

We therefore respectfully request that the Commission decide that the making of the alterations subject of this request do not constitute the making of a material alteration of the terms of the development as granted permission under ABP Reg Ref.: 309773.

However, if the Commission decides that the proposed alterations are material, we wish to refer the Commission to Section 5 of this Planning and Report and the accompanying Environmental Report which sets out the main environmental issues in relation to the proposed alterations. The topics in the original Environmental Impact Assessment Report are reviewed in the context of the proposed alterations. It is considered that the proposed alterations could not reasonably be expected to have any significant effects on the environment.

In conclusion, it is respectfully submitted that the proposed alterations are not material and are consistent with the proper planning and sustainable development of the area. We would respectfully request that the Commission therefore proceed to alter the terms of the development consent for the permitted transmission line in accordance with the proposed alterations set out herein as illustrated in the accompanying drawings prepared by CSEA Consulting Engineers.



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