

Planning Report for a s.182 Electricity Transmission Strategic Infrastructure Development

In respect of

The Provision of Proposed Underground 100kV Transmission Lines between the Kishoge 110kV Gas Insulated Switchgear (GIS) substation and the Aungierstown – Castlebaggot Underground 110kV Transmission Line

Prepared by

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On behalf of

EdgeConneX Ireland Limited

September 2022



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1.0 INTRODUCTION AND CONTEXT

- 1.1 On behalf of our client, EdgeConneX Ireland Limited, 6th Floor South Bank House, Barrow Street, Dublin D04 TR29, and further to a determination received from An Bord Pleanála confirming the proposed development constitutes Strategic Infrastructure Development (SID) pursuant the Section 182E of the Planning & Development Act 2000 (as amended), we hereby submit this planning application in respect of a proposal for the provision of underground 110kV transmission line connections between the Kishoge 110kv Gas Insulated switchgear (GIS) substation on a site within the townland of Ballymakailly, West of Newcastle Road (R120), Lucan, Co. Dublin, and the permitted Aungierstown – Castlebaggot underground 110kV transmission line located at Grange Castle South Business Park, Baldonnel, Dublin 22. The proposed transmission lines provide for a loop-in connection to the permitted Aungierstown – Castlebaggot transmission line.
- 1.2 The location and context of the proposed development is described in further detail in Section 2 below. The proposed development is described as follows within the public notices for the application:

“The proposed development primarily comprises the provision of underground 110kV transmission line connections between the permitted Kishoge 110kv Gas Insulated switchgear (GIS) substation on a site within the townland of Ballymakailly, west of Newcastle Road (R120), Lucan, Co. Dublin, and the permitted Aungierstown – Castlebaggot underground 110kV transmission line located at Grange Castle South Business Park, Baldonnel, Dublin 22. The proposed transmission lines provide for a loop-in connection to the permitted Aungierstown – Castlebaggot underground transmission line along with associated and ancillary works.

The proposed development is located within the townlands of Ballymakailly, Clutterland, Grange, Ballybane, Kilmactalway, Milltown, and Aungierstown and Ballybane. The application site has an area of c. 3.78 hectares.

The proposed development is described as follows:

The proposed 110kV underground transmission line connections will originate from the Kishoge 110kV GIS substation. The substation was permitted under Reg. Ref.: SD19A/0042 and ABP Ref.: 305948-19, as amended under Reg. Ref.: SD22A/0105. The proposed 110kV underground transmission line connections extend northwards from the Kishoge 110kV substation, before proceeding to the east and then to the south, along the periphery of the lands in the ownership of the applicant, and continuing alongside the R120 before continuing to the south and crossing the R134 New Nangor Road. The route then proceeds further southward and to the southeast to cross the R120, continues to the south and then to the east (adjacent to the Old Nangor Road), crossing the Griffeen River and proceeding eastwards and then south before crossing the Baldonnel Road and proceeding eastward within lands to the south of the Grange Castle South Business Park access road, before reaching and connecting to the Aungierstown – Castlebaggot underground transmission line. The Kishoge to Aungierstown transmission line circuit will include 4 no. joint bays, while the Kishoge to Castlebaggot transmission line circuit will include 5 no. joint bays. The proposed 110kV underground transmission line connections will cover a distance of c. 2.2 kilometres.

The development includes enabling works, services diversions, joint bays, connections to the Kishoge substation and the Aungierstown – Castlebaggot transmission line, provision of a medium voltage electricity connection to serve the

Kishoge substation from an existing ESB substation to the east of the R120, landscaping, services, all associated construction works, and all ancillary works.

An Environmental Impact Assessment Report has been prepared in respect of this application.”

Project Scope

- 1.3 The proposed development is described in further detail within Section 6 of this statement. In summary, the proposal comprises the provision of underground 110kV transmission lines to provide a connection between the Kishoge 110kv Gas Insulated switchgear (GIS) substation, and the permitted Aungierstown – Castlebaggot underground 110kV transmission line, which runs between the permitted Aungierstown 110kV substation and existing Castlebaggot 110kV / 220kV substation. The proposed transmission lines provide for a loop-in to the permitted Aungierstown – Castlebaggot transmission line.
- 1.4 There is an extant permission in place for the Kishoge 110kV GIS substation under Reg. Ref.: SD19A/0042 and ABP Ref.: 305948-19, which is subject to amendments as recently permitted under Reg. Ref.: SD22A/0105. While the permitted substation does not form part of the electricity transmission development subject of this application under s.182 of the Act, the layout of the permitted substation, as amended, is illustrated on the accompanying drawings for completeness and consistency.
- 1.5 There is also an extant permission for the Aungierstown 110kV GIS substation under ABP Ref.: VA 06S.309146, which includes the provision of an underground 110kV double circuit transmission line between the Aungierstown and Castlebaggot substations. The proposed development will provide for transmission line connections between the Kishoge substation and the Aungierstown-Castlebaggot transmission line. The development will thereby provide for a loop-in connection to serve the Kishoge substation via the creation of a new Aungierstown-Kishoge 110kV circuit and a new Castlebaggot-Kishoge 110kV circuit.

The project is designed to support the power demand of development on lands adjoining the Kishoge 110kV substation. As set out in further detail below, permission has been granted for a data storage facility and temporary gas powered generation development on adjoining lands (under the same permission as the extant Kishoge substation permission – Reg. Ref.: SD19A/0042 and ABP Ref.: 305948-19), and a further data storage facility and energy centre development was recently permitted by South Dublin County Council under Reg. Ref.: SD21A/0042 also on adjoining lands.

Stakeholders & Roles

- 1.10 The main stakeholders for the development are as set out below. The planning strategy for the proposed development has been discussed with EirGrid and ESB Networks in advance of the submission of application.
 - EirGrid, are responsible for operating and developing the national high voltage electricity grid in Ireland
 - ESB Networks, (Asset Owner) are responsible for carrying out maintenance, repairs and construction on the grid
 - The role of EdgeConnex Ireland Limited for this project is to act as the Developer / Applicant.

Development Method

- 1.11 The underground 110kV transmission lines to provide a loop-in connection to the Aungierstown-Castlebaggot transmission line will be a contestable development. The meaning of this, is that the Developer will be responsible for the design, construction, fit-out and pre-commissioning of the underground 110kV transmission lines. The same will apply to the Kishoge 110kV GIS substation (which does not form part of the development subject of the current electricity transmission application to the Board).
- 1.12 Upon completion of the works by the Developer, the Kishoge 110kV Substation and underground 110kV transmission line connections will be handed over to EirGrid, whom in conjunction with ESB Networks will carry out the final commissioning and energisation of the Kishoge 110kV Substation and the underground double circuit 110kV transmission lines.
- 1.13 Once energised, the Kishoge 110kV Substation and underground 110kV transmission lines loop-in connection will form part of ESB Networks infrastructure, which EirGrid will be responsible for operating.

Applicant and Agent for the Application

- 1.14 The applicant has a registered address at 6th Floor South Bank House, Barrow Street, Dublin D04 TR29 and can be contacted via email at Jordan.vos@bcei.com or legal@edgeconnex.com.
- 1.15 The company registration number of the applicant company is 633161.
- 1.16 The main agent acting on behalf of the Applicant is John Spain Associates, with an address at 39 Fitzwilliam Place, Dublin 2. Mr. Luke Wymer is the contact within John Spain Associates and can be contacted on (01) 6625803, or by email at lwymer@johnspainassociates.com.

2.0 SITE LOCATION AND CONTEXT

Site of the Kishoge Substation

- 2.1 The site of the Kishoge 110kV GIS substation is located on lands within the townland of Ballymakaily to the west of the Newcastle Road (R120). The site is greenfield in nature. As noted previously, there is an extant permission for a 110kV GIS substation on site under Reg. Ref.: SD19A/0042 and ABP Ref.: 305948-19, as amended by recently granted permission Reg. Ref.: SD22A/0105. Within the wider landholding adjoining the permitted substation, there is a further extant permission for a data centre development under Reg. Ref.: SD21A/0042, while there is also another current application for data centre development on lands to the east of the substation site under Reg. Ref.: SD22A/0333.
- 2.2 The R120 road to the east of the Kishoge substation was recently realigned, while the eastern boundary of the wider landholding at this location was previously subject to a compulsory purchase order by the Local Authority to facilitate the construction of a roads scheme (Adamstown / Newcastle Road). The Grand Canal is located to the north of the wider landholding in the ownership of the prospective applicant at this location. The substation site is greenfield in nature.

- 2.3 The wider area surrounding the substation site is defined by existing industrial and data storage facility development to the east and southeast, with greenfield lands to the south and west, and the Grand Canal to the north. The Kishoge substation site is located c. 750m from the Adamstown SDZ. The site of the Kishoge substation is located within a significant landbank of Enterprise and Employment zoned lands, much of which has yet to be developed.
- 2.4 The eastern side of the R120 opposite the subject landholding is defined by a number of detached houses, behind which is an existing and permitted data storage facility development delivered by the applicant.



Figure 2.1: Location of the Kishoge substation

Site of the Aungierstown Substation and Aungierstown-Castlebaggot Transmission Line

- 2.5 The permitted Aungierstown Substation is located on a site which is currently under development to provide for data centre development under Reg. Ref.: SD18A/0134 and ABP Ref.: 302813-18 (as amended by SD20A/0295). There was also permission for a temporary substation on the wider site adjoining the Aungierstown substation, under Reg. Ref.: SD19A/0300.
- 2.6 The site is located to the northwest of the existing Google datacentre campus, and to the southwest of a campus operated by Microsoft. The Castlebaggot 220kV / 110kV substation is located opposite the site, across an estate roadway.
- 2.7 As described in further detail below, the extant permission for the Aungierstown substation also provides for connection with the existing Castlebaggot substation, comprising of an underground 110kV double circuit transmission line, which the current proposed transmission line will break into and provide a loop-in to one circuit of (the Aungierstown-Castlebaggot circuit).

- 2.8 The permitted underground 110kV transmission line connection between the Aungierstown and Castlebaggot substations crosses the estate road separating the two substations, linking to the GIS substation buildings within each of the two substation compounds.

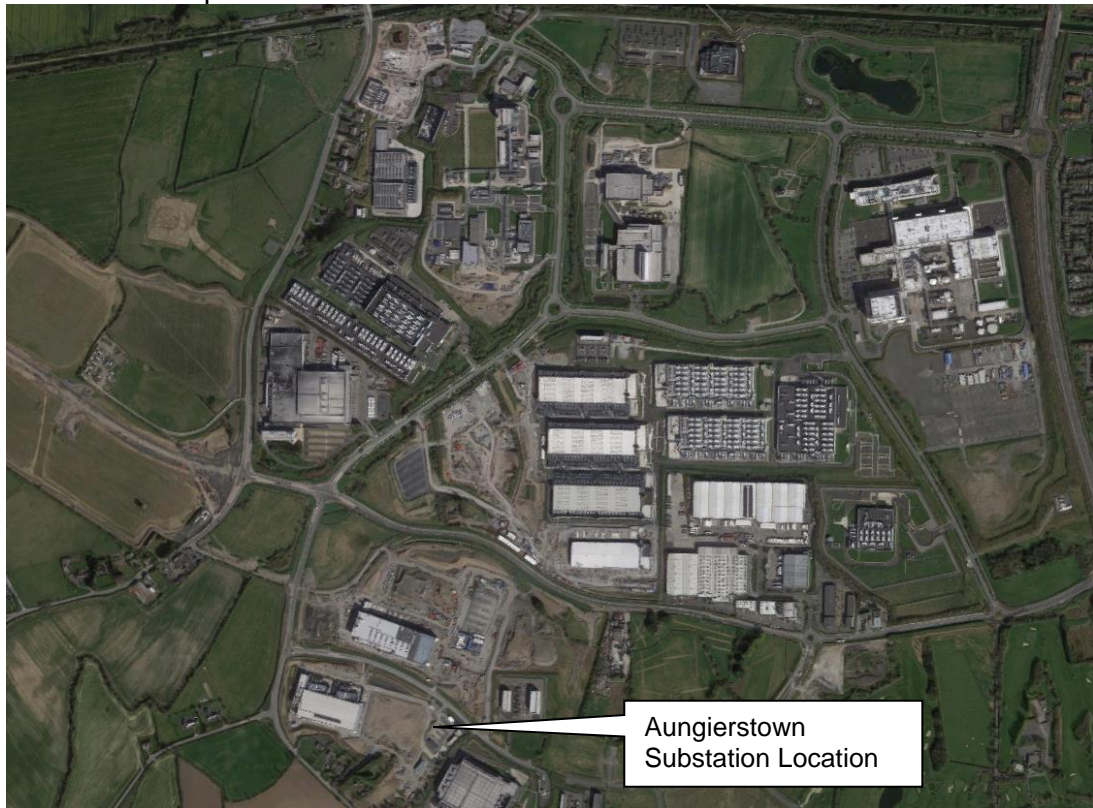


Figure 2.2: Location of the Aungierstown substation

- 2.9 As noted previously, the proposed development will connect to the Aungierstown-Castlebaggot circuit of a permitted underground 100kV double-circuit transmission line which runs between the permitted Aungierstown substation and the existing Castlebaggot substation.
- 2.10 The Castlebaggot 110kV / 220kV substation is located immediately to the northeast of the Aungierstown substation site, and on the opposite side of an existing roadway. The existing substation comprises a 220kV GIS building and a 110kV GIS building, which are set to either side of 4 no. 220kV to 110kV transformers sited within transformer bunds.



Figure 2.3: Location of the Castlebaggot substation

Proposed Underground 110kV Electricity Transmission Line Route

- 2.11 The proposed 110kV underground transmission line connections will originate from the Kishoge 110kV GIS substation. The substation was permitted as part of the development under Reg. Ref.: SD19A/0042 and ABP Ref.: 305948-19, with amendments to the substation having been granted permission under Reg. Ref.: SD22A/0105.
- 2.12 The proposed 110kV underground transmission line connections extend northwards from the Kishoge 110kV substation, before proceeding to the east and then to the south, along the periphery of the lands in the ownership of the applicant, and continuing alongside the R120 before continuing to the south and crossing the R134 / New Nangor Road.
- 2.13 The route then proceeds further southward and to the southeast to cross the R120, continues to the south and then to the east (adjacent to the Old Nangor Road), crossing the Griffeen River and proceeding eastwards and then south before crossing the Baldonnel Road and proceeding eastward within lands to the south of the Grange Castle South Business Park access road, before reaching and connecting to the Aungierstown – Castlebaggot underground transmission line.
- 2.14 We refer the reader to Section 5 of this report for further details of the proposed 110kV transmission line connection. The accompanying drawings prepared by CSEA Consulting Engineers illustrate the transmission line route. The next section of this statement sets out information in relation to pre-application consultations, while the following section sets out the relevant planning history pertaining to the Kishoge substation site, the Aungierstown substation and associated transmission line connections to the Castlebaggot substation, the Castlebaggot substation itself, and adjoining lands.

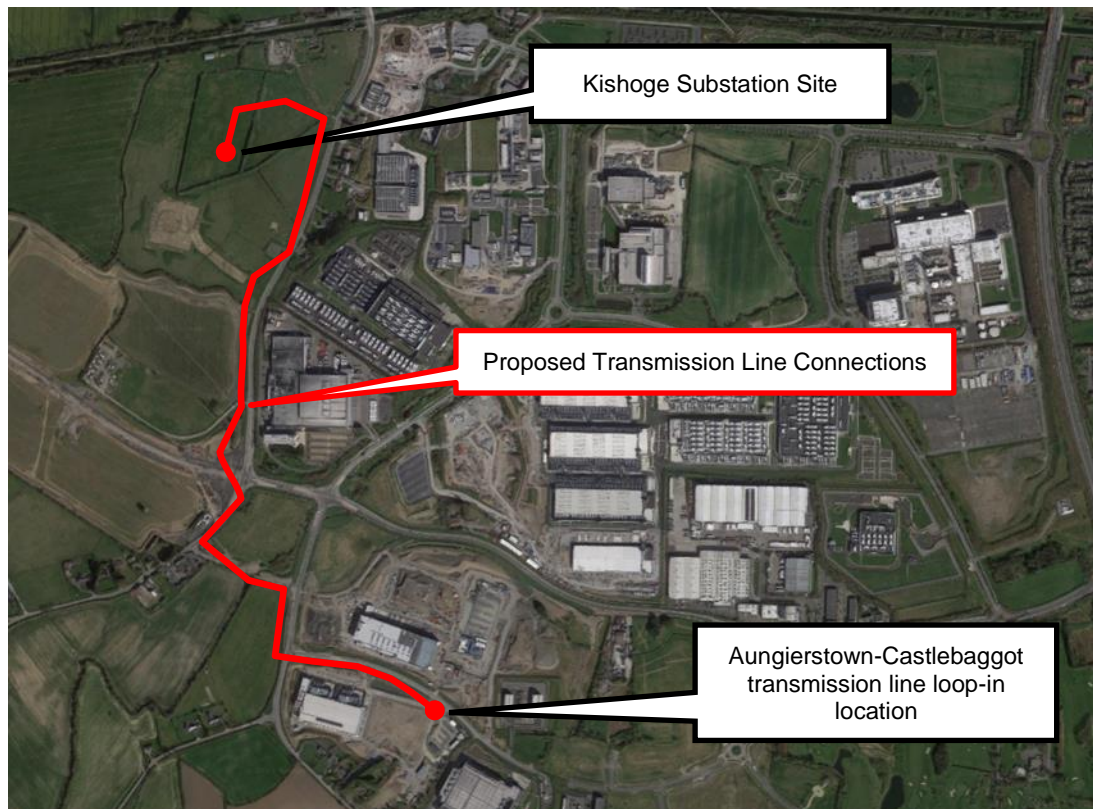


Figure 2.4: Indicative location of the proposed route

3.0 PRE – APPLICATION CONSULTATIONS

- 3.1 The applicant has had 1 no. pre-application consultation meeting with An Bord Pleanála on the 10th of February 2022, in response to a pre-application consultation request received by An Bord Pleanála on the 9th of November 2021.
- 3.2 The purpose of the consultation meeting was to provide further information to An Bord Pleanála to inform their determination as to whether or not the proposed development might constitute strategic infrastructure.
- 3.3 A request to conclude the pre-application process was submitted to An Bord Pleanála on the 17th of February 2022, with the Board issuing their determination on the 22nd of March 2022, that the proposed development falls within the scope of section 182A of the Planning and Development Act, as amended.
- 3.4 The Board Inspector’s report on the pre-application request, which informed the determination by the Board that the development constitutes Strategic Infrastructure Development, stated the following:

“With regard to the electricity transmission line, I note that the prospective applicant has stated that the substation and connection point will become nodes on the national transmission grid, transmitting electricity in both directions. Having regard to the information submitted and that presented during the course of the pre-application meeting I consider that the proposed 110kV transmission cable will become an integral part of the national grid transmission infrastructure, the prospective applicant’s correspondence is clear in this regard.

I conclude that the substation, in forming such a node and in comprising a high voltage line where the voltage would be 110 kilovolts or more, as per Section 182A(9)

of the Planning and Development Act, as amended, constitutes Strategic Infrastructure.”

An Bord Pleanála Determination

- 3.5 An Bord Pleanála have confirmed in a letter dated the 22nd of March 2022 that the proposed development constitutes Strategic Infrastructure within the meaning of section 182A of the Act. The determination was made following the conclusion of the above-referenced pre-application process under ABPRef.: 311907-21.
- 3.6 Therefore, the current application is required to be submitted directly to An Bord Pleanála under section 182A(1) of the Act.
- 3.7 The determination from the Board that the development constitutes a SID was accompanied by an Inspector’s Report, which recommended that the applicant be informed that the proposed development constitutes Strategic Infrastructure.
- 3.8 The determination by the Board that the proposal constitutes Strategic Infrastructure Development was accompanied by a list of Prescribed Bodies, to whom a copy of the application has been issued on the 7th of September 2022. The following bodies were listed:
- Minister for Housing, Local Government and Heritage
 - Minister for Communications, Climate Action and Environment
 - Transport Infrastructure Ireland
 - South Dublin County Council
 - Irish Water
 - Irish Aviation Authority
 - Commission for Regulation of Utilities

4.0 RELEVANT PLANNING HISTORY

- 4.1 This section provides details of the planning history of the subject site and relevant planning history pertaining to adjoining lands.

Kishoge Substation Site and Surrounding Lands

South Dublin County Council Reg. Ref.: SD19A/0042 and ABP Ref.: 305948-19 – Extant permission for Kishoge substation and data storage facility development

- 4.2 On the 5th of October 2020, an Order to grant permission was issued by An Bord Pleanála following consideration of a third party appeal of South Dublin County Council’s decision to grant permission for a development which included the permitted Kishoge substation and a data storage facility along with a temporary gas powered generation plant.
- 4.3 The permitted development comprises the following:
- “Phased development that will include 4 single storey data halls all with associated plant at roof level; 32 standby generators with associated flues (each 15m high); associated office and service areas; service road infrastructure and car parking; ESB sub-station/transformer yard with an overall gross floor area of 17,685sq.m; temporary gas powered generation plant within a walled yard containing 19 generator units with associated flues (each 17m high) to be located to the west of the proposed data halls on a site within the townland of Ballymakailly; Phase 1, 2*

single storey data halls (6,950sq.m.) with roof plant and 16 stand-by generators with associated flues (each 15m high) as well as associated water tower and pump room and other services; single storey goods receiving area/store and single storey office area (1,522sq.m.) located attached and to the north-east of the data halls; temporary gas powered generation plant with 15 generators with associated flues (each 17m high) to be located within a compound to the west of the proposed data halls; attenuation pond; two storey ESB sub-station (494sq.m) with associated transformer yard and single storey transformer building (247sq.m) within compound; Phase 2, 2 single storey data halls (6,950sq.m.) with roof plant and 16 stand-by generators with associated flues (each 15m high) as well as associated water tower and pump room and other services; single storey goods receiving area/store and single storey office area (1,522sq.m) located attached and to the east of the data halls under this Phase and attached and to the north of the offices proposed under Phase 1; 4 additional generators with associated flues (each 17m high) to be constructed within the temporary gas powered generation plant; also ancillary site works; connections to existing infrastructural services as well as fencing; signage; vehicular access off the realigned R120 to provide a new vehicular access into the site as well as internal service roads and entrance gates; car park for 39 car parking spaces (including 4 disabled car parking spaces); sheltered bicycle parking to serve the development. The development will be enclosed with landscaping to all boundaries of the overall site of 22.1ha. Application for enabling works to facilitate this development has been made under Reg. Ref. SD19A/0004.”

- 4.4 The application noted that an Industrial Emissions Licence would be applied for to facilitate the operation of the second phase of the development. An Environmental Impact Assessment Report was submitted with the application.
- 4.5 As noted previously, the prospective applicant has made an application to South Dublin County Council for amendments / alterations to the design and layout of the permitted substation at this location.

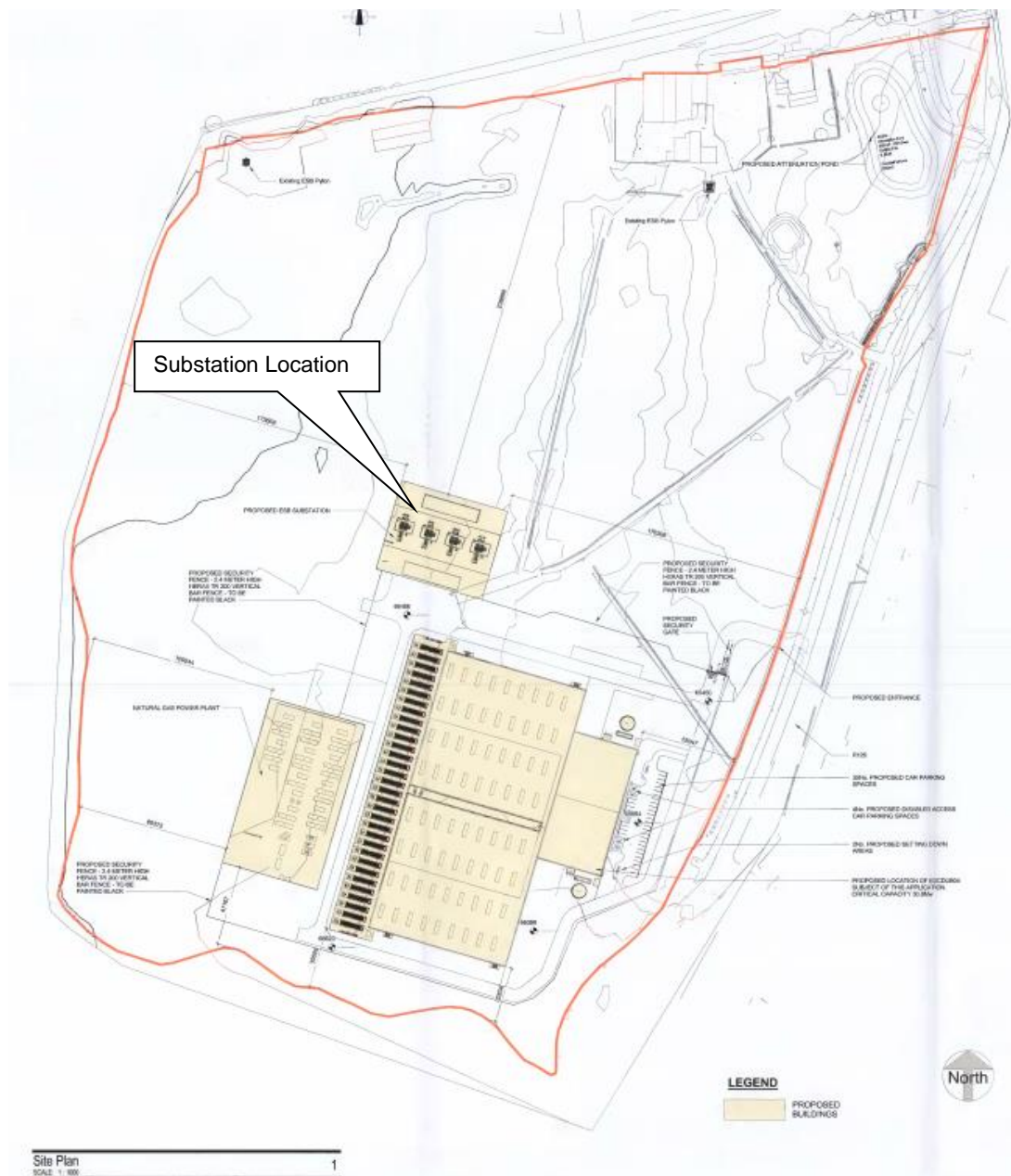


Figure 4.1: Extract from the site layout plan of Reg. Ref.: SD19A/0042 and ABP Ref.: 305948-19, labelled to indicate the location of the substation

South Dublin County Council Reg. Ref.: SD22A/0105 – Amendments to the Permitted Kishoge Substation

- 4.6 On the 19th of July 2022, a final grant of permission was issued by the Planning Authority in respect of amendments to the permitted Kishoge substation. The permitted development comprises the following:

“Amendments to the electrical substation compound and structures permitted under Reg. Ref. SD19A/0042 and ABP Ref. 305948-19 comprising of amendment to the layout and extent of the permitted substation compound, to include an extension of the compound area to c. 0.77 hectares; reorientation of the Gas Insulated Switchgear (GIS) substation building to a north-south orientation, and associated amendments to the building footprint, layout, and elevations, providing for a two storey building with a gross floor area (GFA) of c. 1,456 sq.m; alterations to the permitted single storey Client Control Building to provide for the substitution of this structure with 5

single storey modular client control units, with a combined total GFA of c. 231 sq.m (GFA of c. 46.2 sq.m per module); associated amendments to the permitted substation access arrangements (3 gated access points provided), transformers, security fencing (to be 2.6 metres high in place of the 2.4 metre high fencing permitted), lighting, services, MV substation, parking, utility cabling, amendments to permitted landscaping and berms adjoining the substation compound and associated and ancillary works.”

- 4.7 The final grant of permission by the Planning Authority is subject to 8 conditions.

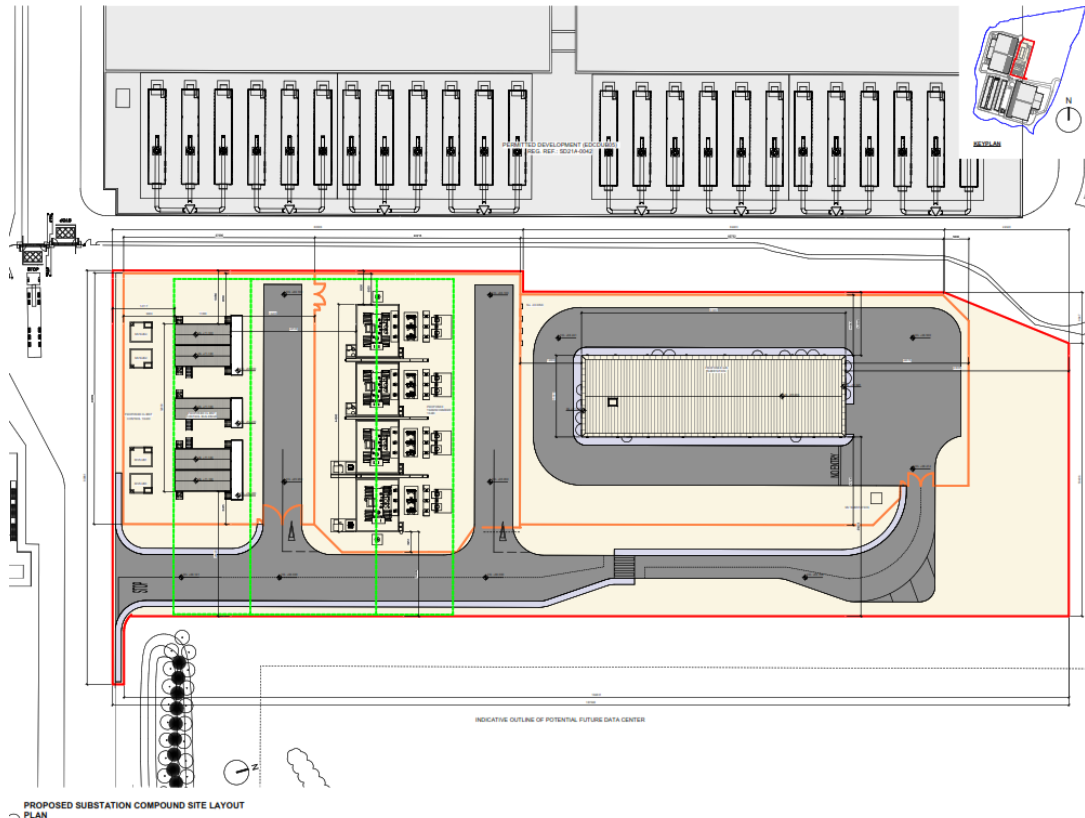


Figure 4.2: Extract from the site layout for the amended Kishoge substation

South Dublin County Council Reg. Ref.: SD21A/0042 –Data Centre and Gas-Powered Generation Plant on lands adjoining the Kishoge substation site

- 4.8 On the 9th of March 2022, following the withdrawal of a third-party appeal, a final grant of permission was issued in respect of the following development on the wider landholding within which the Kishoge 110kV GIS substation will be located:

“Construction of two single storey data centres with associated office and service areas; and three gas powered generation plant buildings with an overall gross floor area of 24,624sq.m that will comprise of the following: Demolition of abandoned single storey dwelling, remaining agricultural shed and derelict former farm building; Construction of 2 single storey data centres (12,797sq.m), both with associated plant at roof level, with 24 standby diesel generators with associated flues (each 25m high) that will be attached to a single storey goods receiving area/store and a single storey office area (2,404sq.m) located to the west of the data centres as well as associated water tower and sprinkler tank and other services; Amendments to the internal access road and omission of access to loading bay permitted under SDCC planning Ref. SD19A/0042/ABP Ref. PL06S.305948 that include the relocation of permitted, and new, internal security gates; and new internal access roads to serve the

proposed development that will provide access to 39 new car parking spaces (including 4 electric and 2 disabled spaces) and sheltered bicycle parking to serve the new data centres; The development will also include the phased development of 3 two storey gas powered generation plants (9,286sq.m) within three individual buildings and ancillary development to provide power to facilitate the development of the overall site to be located within the south-west part of the overall site. Gas plant 1 (3,045sq.m) will contain 20 generator units (18+2) with associated flues (each 25m high) will facilitate, once operational the decommissioning of the temporary Gas Powered Generation Plant within its open compound as granted under SDCC Planning Ref. SD19A/0042/ABP Ref. PL06S.305948. Gas plant 2 (3,045sq.m) will contain 20 generator units (18+2) with associated flues (each 25m high). and, Gas plant 3 (3,196sq.m) will contain 21 generator units (19+2) with associated flues (each 25m high). These plants will be built to provide power to each data centre, if and, when required. The gas plants will be required as back up power generation once the permitted power connection via the permitted substation is achieved; New attenuation pond to the north of the site; Green walls are proposed on the southern elevation of each power plant, as well as to the northern elevation of the generator compound of the data centres, and enclosing the water tower/pump room compound, and a new hedgerow is proposed linking east and west of the site; Proposed above ground gas installation compound to contain single storey kiosk (93sq.m) and boiler room (44sq.m). The development will also include ancillary site works, connections to existing infrastructural services as well as fencing and signage. The development will include minor modifications to the permitted landscaping to the west of the site as granted under SDCC planning Ref. SD19A/0042/ABP Ref. PL06S.305948. The site will remain enclosed by landscaping to all boundaries. The development will be accessed off the R120 via the permitted access granted under SDCC planning Ref. SD19A/0042/ABP Ref. PL06S.305948. An EPA-Industrial Emissions (IE) licence will be applied for to facilitate the operation of the gas powered generation plant. An Environment Impact Assessment Report (EIAR) has been submitted with this application. All on a site of 22.1hectares.”

- 4.9 The application was subject to requests for Further Information and Clarification of Further Information from the Planning Authority. The final grant of permission was subject to 21 no. conditions.

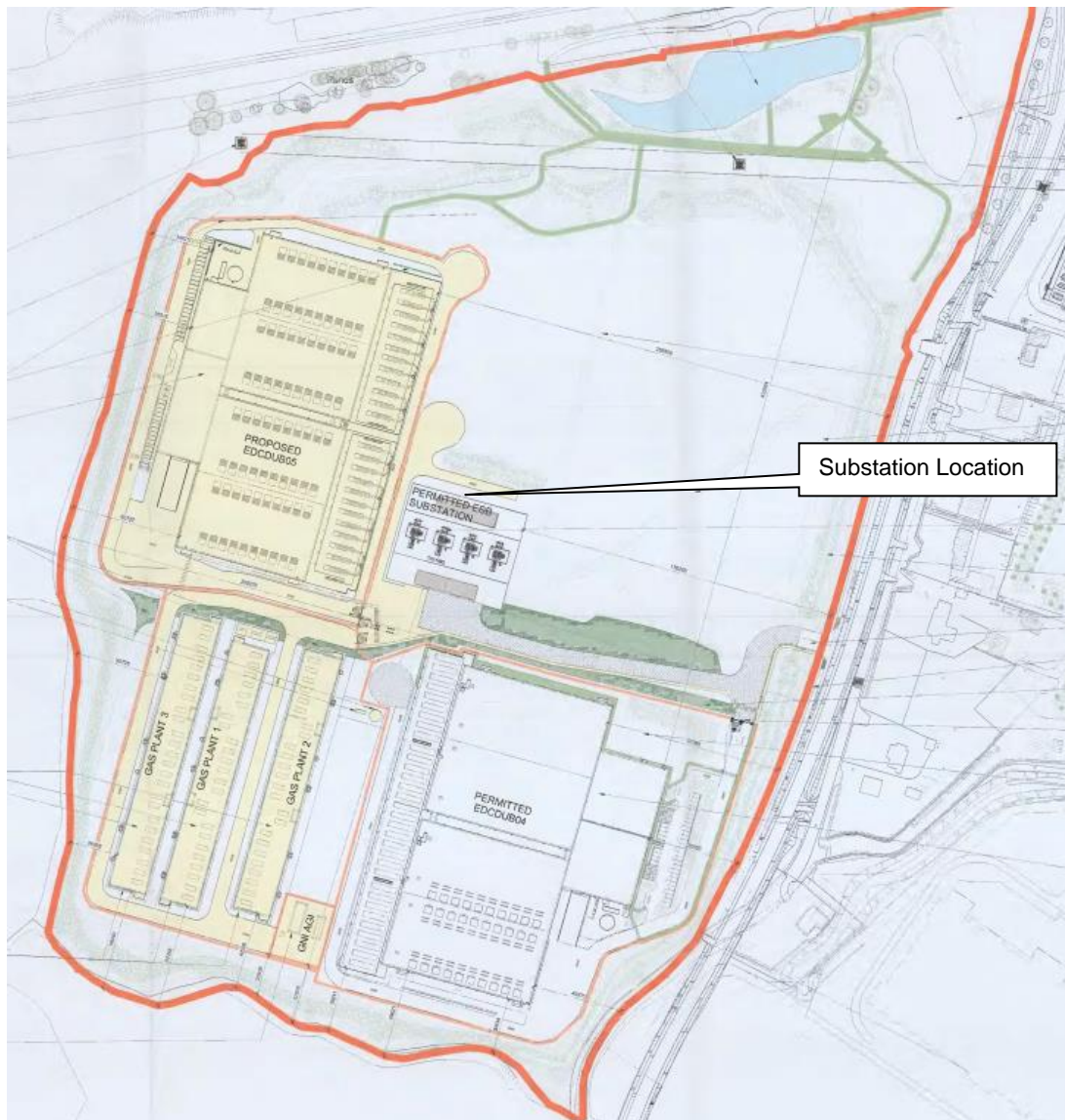


Figure 4.3: Extract from the Further Information stage site layout plan of Reg. Ref.: SD21A/0042, labelled to indicate the location the permitted substation

South Dublin County Council Reg. Ref.: SD22A/0289 – Amendment to Condition nos. 3(ii) and (iii) of Reg. Ref.: SD21A/0042

- 4.10 On the 22nd of August 2022, a decision to grant permission was issued in respect of the following proposed development:

“The development will consist of the amendment of Condition no. 3 (ii) and 3 (iii) of the permission granted under Reg. Ref. SO21A/0042 that related to the Gas Plant of the overall permitted development only, so that these aspects of the new condition shall read as follows:

Condition no. 3(ii)

Within four (4) years from the date the first Gas Plant commences operation, the applicant or operator shall undertake a review with GNI of the ability to serve the Gas Plant with green gas and / or hydrogen (or similar fuels) shall be Investigated and reported to the Planning Authority. Any ability for the Gas Plant to be operated with green gas and/ or hydrogen (or similar fuels) shall be implemented within an agreed timeline agreed with GNI.

Condition no. 3(iii)

If the applicant receives a firm offer from Eirgrid under which the Gas Plant is not required, and the connection has been realized with capacity onsite from Eirgrid, then the Gas Plants shall be removed from the entire site within a year of the ceasing of operation.

The nature and extent of the permitted Gas Plants, or any other element of the parent permission granted under Reg. Ref. SD21A/0042 will otherwise not be amended by this application. An EPA-Industrial Emissions (IE) licence will be applied for to facilitate the operation of the Gas Plant that is subject of this amendment application.”

- 4.11 this valid application was submitted less than 6 months ago, and overlaps with the site of the current SID application, the site notices for the current application are printed on a yellow background.

South Dublin County Council Reg. Ref.: SD21A/0042 – Application for enabling works on the southern portion of the wider landholding within which the Kishoge substation site is located

- 4.12 On the 16th of April 2019, a final grant of permission was issued by the Planning Authority for the following development:

“Enabling works to facilitate the future development of the site; topsoil strip and a cut and fill operation across the site; temporary construction access will be created off the R120 to facilitate the works within the townland of Ballymakailly to the west of the Newcastle Road (R120).”

South Dublin County Council Reg. Ref.: SD22A/0333

- 4.13 On the 16th of August 2022, an application on a site within the townland of Ballymakailly, on lands to the east of the permitted Kishoge Substation, was submitted to the Planning Authority. The application which is currently under consideration consists of the following:

“Construction of 2 adjoined single storey data centres with associated office and service areas with an overall gross floor area of 15,274sq.m comprising of the construction of 2 adjoined single storey data centres with a gross floor area of 12,859sq.m that will include a single storey goods receiving area / store and single storey office area (2,415sq.m) with PV panels above, located to the east of the data centres as well as associated water tower, sprinkler tank, pump house and other services; The data centres will also include plant at roof level; with 24 standby diesel generators with associated flues (each 25m high) that will be located within a generator yard to the west of the data centres; New internal access road and security gates to serve the proposed development that will provide access to 36 new car parking spaces (including 4 electric and 2 disabled spaces) and sheltered bicycle parking to serve the new data centres; New attenuation ponds to the north of the proposed data centres; Green walls are proposed to the south and east that will enclose the water tower and pump house compound; The development will also include ancillary site works, connections to existing infrastructural services as well as fencing and signage; The development will include minor modifications to the permitted landscaping to the west of the site as granted under SDCC Planning Ref. SD19A/0042 / ABP Ref. PL06S.305948 and Ref. SD21A/0042; The site will remain enclosed by landscaping to all boundaries; The development will be accessed off the R120 via the permitted access granted under SDCC Planning Ref. SD19A/0042

“/ ABP Ref. PL06S.305948 and SD21A/0042; An Environmental Impact Assessment Report (EIAR) has been submitted with this application.”

- 4.14 A decision on the application is due on the 10th of October 2022. As this valid application was submitted less than 6 months ago and overlaps with the site of the current SID application, the site notices for the current application are printed on a yellow background. It should be noted that the transmission line development subject of this application under section 182 to the Board is required to serve the previously permitted developments on surrounding lands as outlined above (i.e. the proposed transmission line connections are required to serve an already permitted substation, rather than the development subject to the concurrent application under Reg. Ref.: SD22A/0333).

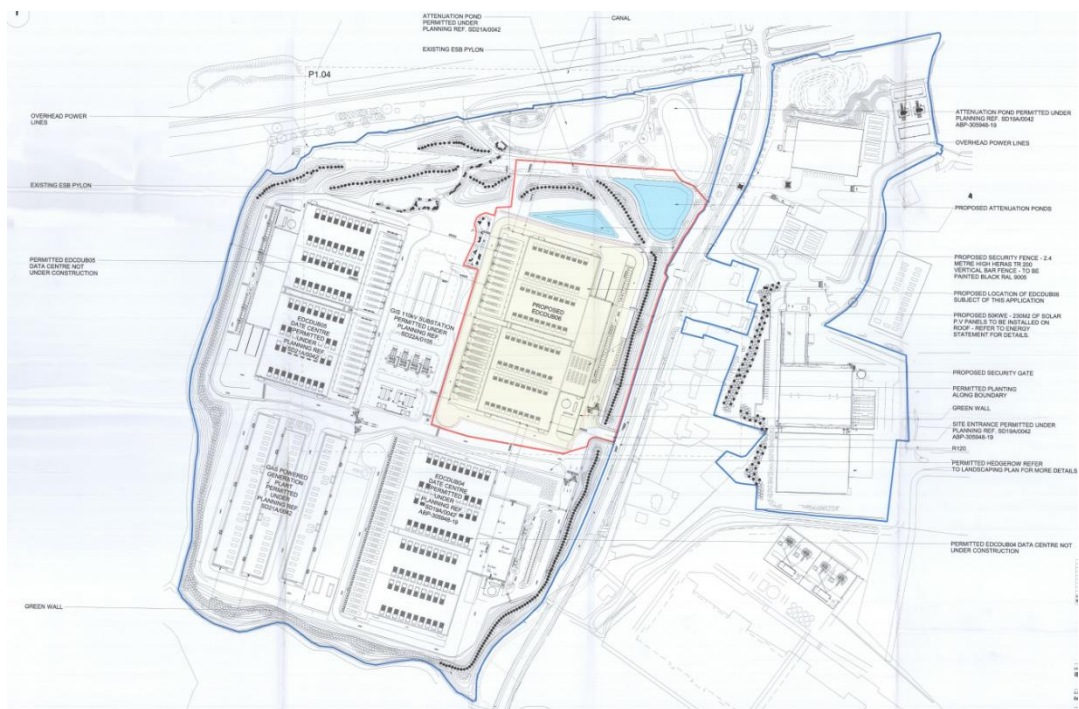


Figure 4.4: Extract from the site layout plan of Reg. Ref.: SD22A/0333

Aungierstown Substation and Associated 110kV Transmission Lines

ABP Ref.: VA06S.309146 – Application under section 182 of the Act for the permitted Aungierstown Substation

- 4.15 An Order to grant permission was issued on the 19th of July 2021 for a development comprising 2 no. 110kV transmission lines and a 110kV Gas Insulated Switchgear (GIS) substation (to be known as Aungierstown substation).
- 4.16 The development was described as follows within the public notices:

“The proposed 110kV GIS Substation Compound is to be located on lands to the north-east of the two storey data centre facility and associated three storey office block that was permitted under SDCC Reg. Ref. SD18A/0134 / An Bord Pleanála Ref. ABP-302813-18, and within an overall landholding bound to the north by the Grange Castle South Business Park access road; to the west by the Baldonnell Road and to the south by 3 no. residential properties and the Baldonnell Road; and to the east by the Google data centre facility within the Grange Castle South Business

Park, Baldonnel, Dublin 22. The site of the proposed development has an area of c. 0.9163 hectares.

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 1,307.2sqm) (known as the Aungierstown Substation), two transformers, lighting and lightning masts, car parking, associated underground services and roads within a 2.6m high fenced compound and all associated construction and ancillary works.

Two proposed underground single circuit 110kV transmission lines will connect the proposed Aungierstown 110kV GIS Substation to the existing 220kV / 110kV Castlebaggot Substation to the immediate north-east. The proposed transmission lines cover a distance of approximately 120m and 140m within the townlands of Ballybane, and Aungierstown and Ballybane.

The development includes the connections to the two substations (existing and proposed), changes to landscaping permitted under SDCC Reg. Ref. SD18A/0134 / An Bord Pleanála Ref. ABP-302813-18 and all associated construction and ancillary works.”

- 4.17 An Environmental Impact Assessment Report was submitted with the application.
- 4.18 The transmission lines forming part of the application provide for a connection between the Aungierstown substation and the nearby Castlebaggot substation, located a short distance to the northeast.
- 4.19 The development subject of this application will provide for a link between the previously mentioned Kishoge substation, and the permitted Aungierstown-Castlebaggot transmission line. The drawing extract below illustrates the Aungierstown substation and its associated connection with the Castlebaggot substation.

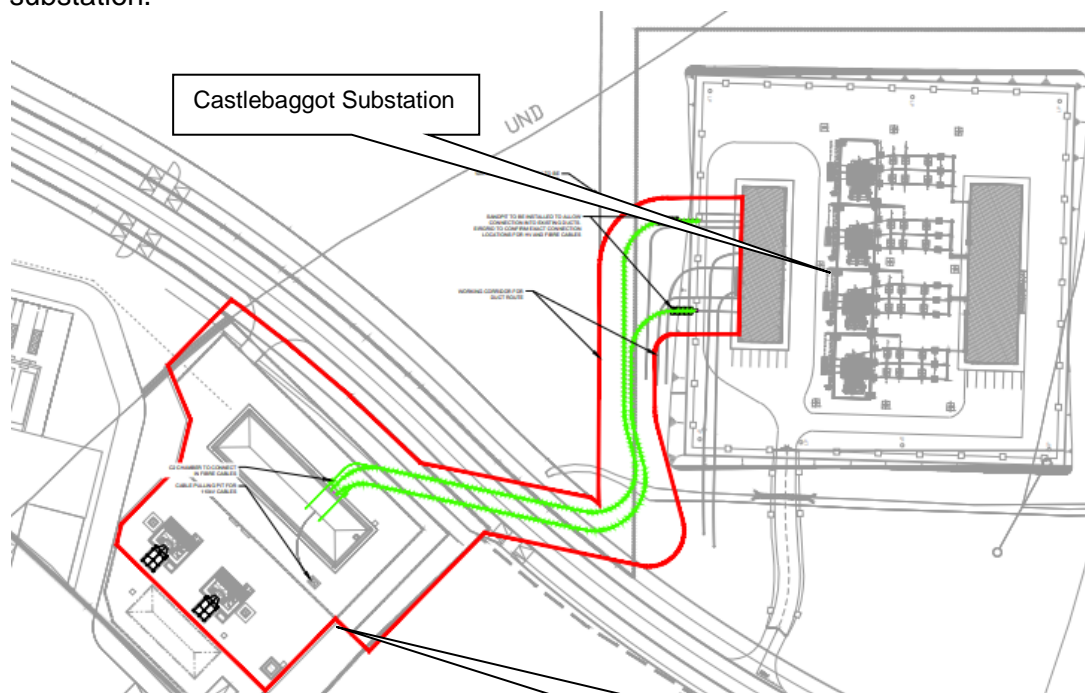


Figure 4.5: Extract from drawing su application ABP Ref.: VA06S.309146, illustrating the Aungierstown Substation and its connection to the existing Castlebaggot substation

Castlebaggot Substation

ABP Ref. 06S.VA0019 – Permission under section 182 of the Act for the Castlebaggot substation

4.20 An Order to grant permission dated the 27th of June 2016 was issued by An Bord Pleanála for the development of a 220kV /110 kV Substation & Associated Works on land within the Grange Castle South Business Park, Baldonnell, Dublin 22. The development description for the application as outlined in the Board's Inspector's Report was a 220/110 kV Gas Insulated Switchgear (GIS) substation compound, on an approximately three-hectare site (including associated landscaped space). The main elements of the permitted substation comprise:

- a 220 kV substation building of approximately 720sqm, rising to approximately 16.6m over ground level;
- a 110 kV substation building of approximately 528sqm, rising to approximately 14.5m over ground level;
- four no. associated 220 kV to 110 kV transformers sited within transformer bunds; - associated external over ground electrical equipment and apparatus including cable sealing ends, surge arrestors, conductor support structures, post insulators, lightning monopoles (approximately 15m over ground), lighting and associated underground cabling;
- associated ancillary drainage works;
- associated site development and landscaping works;
- associated substation car parking (12 spaces), vehicular circulation route, and other hard surfacing; and
- associated 2.6m (approximately) high metal palisade substation perimeter fence, including substation entrance gates approximately 5.1m wide.

4.21 The application also included two interface compound sites (approximately 0.1ha each) to connect the existing Inchicore-Maynooth 220 kV double-circuit overhead line to the proposed substation by means of underground cable. These interfaces were located to the west of the Lucan Sarsfields GAA Club sports grounds and to the north-western side of Lynches Lane.

4.22 The development also included various infrastructural changes to the alignment of the Inchicore-Maynooth 220 kV double-circuit overhead line; and the implementation of 4 no. 220 kV underground cables connecting the two interface compound sites with the new substation; and one 110 kV underground cable connecting the proposed substation with the existing 110 kV Corkagh substation located within the existing Grange Castle Business Park.

4.23 The decision to grant permission was made on the 27th of June 2016 and was subject to 14 conditions.

5.0 DEVELOPMENT DESCRIPTION

5.1 The proposed development comprises the provision of two underground 110kV transmission lines between the Kishoge 110kV Gas Insulated switchgear (GIS) substation and the Aungierstown-Castlebaggot underground 110kV transmission line. The development will thereby provide for a loop-in connection to serve the Kishoge substation via the creation of a new Aungierstown-Kishoge 110kV circuit and a new Castlebaggot-Kishoge 110kV circuit.

- 5.2 The proposed development constitutes transmission infrastructure connecting a new node on the grid with the transmission network.
- 5.3 The proposed development will comprise the laying of an underground 110kV transmission line to provide a loop-in to the permitted Aungierstown-Castlebaggot transmission line.
- 5.4 The Kishoge substation and proposed loop-in location are located c. 1.5 kilometres apart as the crow flies, and are separated by areas of data centre development, greenfield areas, roadways, and other commercial uses. Due to the route taken by the proposed transmission line connections, the length of the proposed circuits is c. 2.4 kilometres.
- 5.5 The development will include adjacent access paths along portions of the transmission line route, connections to the Kishoge substation and loop-in connections to the Aungierstown-Castlebaggot transmission line, along with all associated site and construction works, and all ancillary works.

Proposed Underground Transmission Lines and Proposed Route

- 5.6 The proposed 110kV underground transmission line connections will originate from the Kishoge 110kV GIS substation. The substation was permitted as part of the development under Reg. Ref.: SD19A/0042 and ABP Ref.: 305948-19, and has since been subject to amendments which were recently subject to a final grant of permission from the Planning Authority under Reg. Ref.: SD22A/0105.
- 5.7 The proposed 110kV underground transmission line connections extend northwards from the Kishoge 110kV substation, before proceeding to the east and then to the south, along the periphery of the lands in the ownership of the applicant, and continuing alongside the R120 before continuing to the south and crossing the R134 / New Nangor Road.
- 5.8 The route then proceeds further southward and to the southeast to cross the R120, continues to the south and then to the east (adjacent to the Old Nangor Road), crossing the Griffeen River and proceeding eastwards and then south before crossing the Baldonnel Road and proceeding eastward within lands to the south of the Grange Castle South Business Park access road, before reaching and connecting to the Aungierstown – Castlebaggot underground transmission line.
- 5.9 The Kishoge to Aungierstown transmission line circuit will include 4 no. joint bays, while the Kishoge to Castlebaggot transmission line circuit will include 5 no. joint bays. The proposed 110kV underground transmission line connections will cover a distance of c. 2.2 kilometres.

- 5.12 The proposed development also includes all associated landscaping, services, all associated construction works, and all ancillary works.

Requirement for the Proposed Development

- 5.13 The applicant is not a Local Authority or a State Body (as set out under Part XI of the Planning and Development Act as amended). The applicant is a private entity and requires electricity connections to power its permitted development of the adjoining lands. The development will also provide capacity for other potential future development in the vicinity.
- 5.14 Permission for a data storage facility development has previously been granted on the lands within which the Kishoge 110kV GIS substation is to be located. Any additional or alternate development on the adjoining lands will be subject to separate future planning application(s) and environmental assessment (if required).

6.0 RELEVANT NATIONAL AND REGIONAL POLICY CONTEXT

Government Statement on The Role of Data Centres in Ireland's Enterprise Strategy

- 6.1 The revised Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy was published in July 2022.
- 6.2 The Statement recognises that data centres are core digital infrastructure, while acknowledging the constraints associated with the national grid and the need to achieve a transition to decarbonised forms of development. While the current proposal represents electricity transmission infrastructure (rather than an application for data centre development), it will serve a permitted substation (Kishoge substation), which in turn will serve several permitted data centre developments (with a further phase of development currently under consideration by the Planning Authority).
- 6.3 The current Strategic Infrastructure Development proposal constitutes the provision of transmission infrastructure required to provide electricity for the development of the area, including permitted and proposed data centre development surrounding the Kishoge substation.
- 6.4 As the proposed development represents necessary infrastructure to serve permitted data centre development in the area, and potential future further phases of such development on adjoining lands, it is considered to accord with the recently published Government Statement.

National Planning Framework – Ireland 2040

- 6.5 The National Planning Framework was published in February 2018 and contains policies which are supportive of the development of ICT infrastructure, with particular reference made to "*datacentres*".
- 6.6 National Strategic Outcome 6 of the NPF relates to the creation of "*A Strong Economy Supported by Enterprise, Innovation and Skills*". This strategic outcome is underpinned by a range of objectives relating to job creation and the fostering of enterprise and innovation.
- 6.7 The following objective, relating to ICT infrastructure (including datacentres) is included under National Strategic Outcome 6:

“Promotion of Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities.”

6.8 The current application proposes the provision of electricity infrastructure which will serve a proposed data storage facility development, and is therefore considered to be in accordance with the foregoing policies.

6.9 The NPF further states under National Strategic Outcome 6:

“Ireland is very attractive in terms of international digital connectivity, climatic factors and current and future renewable energy sources for the development of international digital infrastructures, such as data centres. This sector underpins Ireland’s international position as a location for ICT and creates added benefits in relation to establishing a threshold of demand for sustained development of renewable energy sources.”

6.10 As noted above, the proposed development constitutes the development of the grid to serve a previously permitted data storage facility development (and further development currently subject to a separate application) and is therefore considered to fully accord with the foregoing strategic outcome.

6.11 The NPF states at Section 4.4 that *“Planning to accommodate strategic employment growth at regional, metropolitan and local level should include consideration of: Locations for new enterprises, based on the extent to which they are people intensive (i.e. employees/ customers), space extensive (i.e. land), tied to resources, dependent on the availability of different types of infrastructure (e.g. telecoms, power, water, roads, airport, port etc.) or dependent on skills availability.”*

6.12 National Policy Objective 47 is *“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.”* As set out above, the proposed development represents the development of the electricity grid to provide a secure supply to permitted and proposed development in the area.

Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly 2019

6.13 The Eastern and Midlands Regional Assembly (EMRA) adopted the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Region in 2019.

6.14 The EMRA RSES recognises the need to facilitate the provision of sufficient electricity to meet increasing demand in the region. Regional Policy Objective (RPO) 10.20 states the following:

“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. Including 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.”

- 6.15 The proposed development constitutes a transmission project which is required to serve the electricity needs currently proposed and future development in the area in accordance with the foregoing objective.
- 6.16 The strategy goes on to state the following:
- “The Dublin Region is the major load centre on the Irish electricity transmission system. Approximately one third of total demand is located here, similarly the Eastern Region is a major load centre on the Irish transmission system. The main urban demand centres are composed of a mix of residential, commercial and industrial demand, which is expected to grow up to 2025 and beyond. Developing the grid in the Region will enable the transmission system to safely accommodate more diverse power flows from renewable generation and also to facilitate future growth in electricity demand. These developments will strengthen the grid for all electricity users, and in doing so will improve the security and quality of supply. This is particularly important if the Region is to attract high technology industries that depend on a reliable, high quality, electricity supply.”*
- 6.17 The RSES provides for a series of principles, pursuant to which Local Authority Development Plans will *“facilitate the provision of energy networks in principle”*:
- *“The development is required in order to facilitate the provision or retention of significant economic or social infrastructure.*
 - *The route proposed has been identified with due consideration for social, environmental and cultural impacts and address issues of climate resilience, biodiversity, impact on soils and water quality.*
 - *The design is such that it will achieve least environmental impact.*
 - *Where impacts are inevitable mitigation features have been included.*
 - *Where it can be shown that the proposed development is consistent with international best practice with regard to materials and technologies and that it will ensure a safe, secure, reliable, economic and efficient high-quality network.*
 - *In considering facilities of this nature that traverse a number of counties or that traverse one county in order to serve another, planning authorities should consider the proposal in light of the criteria outlined above. It is important that planning authorities are engaged in early consultation and discussion with the relevant Transmission System Operator.*
 - *Corridors for energy transmission or pipelines should avoid creating sterile lands proximate to key public transport corridors, particularly rail routes, and in built up urban areas.*
 - *Regard for any National or Regional Landscape/ Seascape Character Assessment.”*
- 6.18 In response to the above it is considered that the proposed, comparatively localised, electricity transmission infrastructure is required to facilitate significant economic infrastructure in the area. It is also considered that the route for the proposed transmission line connections has been identified with due consideration for social, environmental and cultural impacts (as set out in detail within the EIAR). The design selected has been predicated on the need to minimise environmental impact and includes mitigation measures as set out within the EIAR submitted herewith. The design of the project has been undertaken in accordance with best practice by the project engineers, and the corridor selected will avoid the sterilisation of lands proximate to key public transport corridors, particularly rail routes, or built up urban areas.
- 6.19 The proposal is also considered to be consistent with Regional Policy Objective RPO 10.20 which seeks to *“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.”

7.0 LOCAL PLANNING POLICY

- 7.1 This proposed development comprises of development within the functional area of South Dublin County.

South Dublin County Development Plan 2022 – 2028

- 7.2 The South Dublin County Development Plan 2022-2028 was made on 22nd June 2022 and came into effect on 3rd August 2022. It is noted that on the 28th of July 2022, the Minister of State for Local Government and Planning (consequent to a recommendation made to him by the Office of the Planning Regulator under Section 31 AM(8) of the Planning and Development Act 2000 (as amended)), has issued a notice of the Minister’s intent to issue a Direction to South Dublin County Council. The Draft Ministerial Direction relates to the South Dublin County Development Plan 2022- 2028.
- 7.3 If / when issued as a formal Ministerial Direction, the draft direction would have the effect of *inter alia* altering the zoning matrices associated with the EE, REGEN, and MRC zoning objectives, to make Data Centre an open for consideration use under each of these zonings.

Land Use Zoning

- 7.4 Under the County Development Plan, the lands on which the proposed underground 110kV transmission lines will be located are zoned EE.
- 7.5 “Public services” use is a permissible use under the zoning objective within the Plan.
- 7.6 Public services are defined in the Appendix 6 as *“A building or part thereof or land used for the provision of public services. Public services include all service installations necessarily required by electricity, gas, telephone, radio, telecommunications, television, drainage and other statutory undertakers, it includes public lavatories, public telephone boxes, bus shelters, bring centres, green waste and composting facilities.”* The proposed development therefore falls into this use class as it represents a new proposed part of the national transmission grid. Once completed and commissioned, the proposed development will form part of ESB Networks infrastructure, which EirGrid will be responsible for operating
- 7.7 The proposal is therefore consistent with the zoning objective pertaining to the lands.

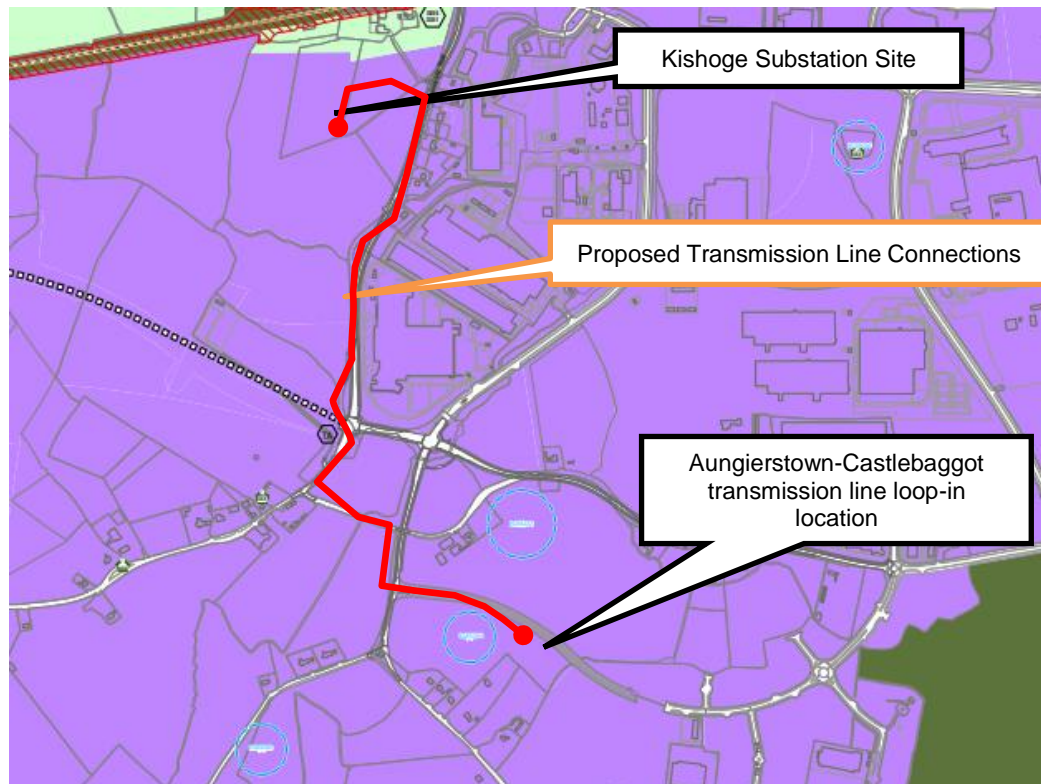


Figure 7.1: Extract from the Development Plan zoning map

Economic Development and Employment

- 7.8 Objective EDE4 OBJ 12 is *“To support the Government’s Making Remote Work National Remote Work Strategy and the provision of appropriate IT infrastructure and facilities (including hubs at neighbourhood level) that enable a better life-work balance enabling people to live near their place of work.”*
- 7.9 Objective EDE5 OBJ 1 is *“To prioritise hi-tech manufacturing, research and development and associated uses in the established Business and Technology clusters to the west of the County (Grange Castle and Citywest areas) maximising the value of higher order infrastructure and services that are required to support large scale strategic investment.”*
- 7.10 Objective EDE5 OBJ 2 is *“To support the phased expansion of the established Business and Technology Clusters to accommodate strategic hi-tech manufacturing investments, research and development and associated uses.”*
- 7.11 Objective EDE5 OBJ 3 is *“To support expansion of sectoral clusters, particularly in pharmaceuticals, health and IT with a view to enhancing linkages between Foreign Direct Investment (FDI) and Small and Medium sized Enterprises (SMEs) in the County.”*
- 7.12 Objective EDE5 OBJ 6 is *“To ensure that business environments are facilitated according to the needs of sectors; whether they be place making objectives in urban settings or campus style landscapes that complement certain pharmaceutical and hi-tech industries.”*
- 7.13 Policy EDE POL7 is *“Recognise the need for land extensive uses and ensure that they are located within appropriate locations having regard to infrastructural, transport and environmental considerations and the need for orderly growth.”*

- 7.14 The proposed development accords with each of the foregoing objectives as it represents the provision of new utility infrastructure to serve a rapidly developing area of the County, which has been targeted for further commercial and employment development and growth.

Infrastructure and Environmental Services

- 7.15 Section 11.5 of the Development Plan relates to Electricity Infrastructure, and recognises that *“The protection of existing networks as well as expansion, where necessary, will enable energy service providers to deliver their statutory function.”* The proposed development represents the necessary expansion of the national electricity grid and is therefore supported in principle by this section of the Development Plan.
- 7.16 Policy IE6 of the Plan is to *“Protect the existing electricity infrastructure and support the development of a safe, secure and reliable supply of electricity and the development of enhanced electricity networks as well as new transmission infrastructure projects subject to the relevant environmental assessments.”* The proposed development represents a new transmission infrastructure project. The current application is accompanied by detailed documentation to enable the Board to undertake a robust Environmental Impact Assessment and Appropriate Assessment Screening in respect of the proposed development.
- 7.17 Objective IE6 OBJ 2 is *“To support the reinforcement and strengthening of the electricity transmission and distribution network to facilitate planned growth and transmission / distribution of a renewable energy focused generation in line with RPO 10.22”*. The proposed development represents the development of the national transmission network in order to facilitate planned and permitted growth in the area.
- 7.18 Having regard to the foregoing, it is considered that the proposed development is compliant with the zoning objective pertaining to the lands, and is also supported by other relevant policies and objectives of the South Dublin County Development Plan 2022-2028.

8.0 ENVIRONMENTAL IMPACT ASSESSMENT AND APPROPRIATE ASSESSMENT

- 8.1 An Environmental Impact Assessment Report (EIAR) including a Non-Technical Summary has been prepared / coordinated by AWN Environmental Consultants and is submitted along with this application.
- 8.2 An Appropriate Assessment Screening Report has also been prepared and is included as an Appendix of the EIAR (Appendix 8.1 refers).

9.0 CONCLUSION

- 9.1 This application under section 182 of the Planning and Development Act 2000, as amended, is submitted on behalf of the prospective applicant EdgeConnex Ireland Limited. The current application relates to the proposed provision of underground 110kV transmission line connections between the Kishoge 110kv Gas Insulated switchgear (GIS) substation on a site within the townland of Ballymakailly, West of Newcastle Road (R120), Lucan, Co. Dublin, and the permitted Aungierstown – Castlebaggot underground 110kV transmission line located at Grange Castle South Business Park, Baldonnell, Dublin 22. The proposed transmission lines provide for a loop-in connection to the permitted Aungierstown – Castlebaggot transmission line.

This project is designed to support current power demand and future growth within the area inclusive but not limited to the power requirements for the permitted and proposed data centre developments on the lands adjoining the permitted Kishoge substation.

9.2

The proposal is in accordance with the policies and objectives of national and regional planning policy, and the South Dublin County Development Plan.

9.3

It has been demonstrated within this report, as well as within the accompanying drawings, documents, and Environmental Impact Assessment Report that the proposal provides a suitable use of the subject lands. The applicant and design team in preparing the application documentation have considered the issues raised within the pre-application consultations undertaken with An Bord Pleanála and their determination issued prior to the lodgement of this application.

9.4

If you require any further information, or clarification on the above, please do not hesitate to contact us.

Yours faithfully,



John Spain Associates

APPENDIX 1: EXTRACT OF BOARD CONFIRMATION THAT THE PROPOSED DEVELOPMENT CONSTITUTES STRATEGIC INFRASTRUCTURE DEVELOPMENT

Our Case Number: ABP-311907-21
Your Reference: Edgeconnex Ireland Ltd



An
Bord
Pleanála

John Spain Associates
 39 Fitzwilliam Place
 Dublin 2
 D02 ND61



Date: 22 March 2022

Re: Proposed underground 110kV transmission line connections between the Kishoge 110kV GIS substation in Ballymakailly, West of Newcastle Road, Lucan, Co. Dublin and the permitted Aunglerstown-Castlebaggot underground 110kV transmission line at Grange Castle South Business Park, Baldonnel, Dublin 22.
 Ballymakailly, West of Newcastle Road, Lucan, Co. Dublin to Grange Castle South Business Park, Baldonnel, Dublin 22.

Dear Sir / Madam,

Please be advised that following consultations under section 182E of the Planning and Development Act, 2000, as amended, the Board hereby serves notice that it is of the opinion that the proposed development falls within the scope of section 182A of the Planning and Development Act, 2000 as amended. Accordingly, the Board has decided that the proposed development would be strategic infrastructure within the meaning of section 182A of the Planning and Development Act, 2000, as amended. Any application for approval for the proposed development must therefore be made directly to An Bord Pleanála under section 182A(1) of the Act.

Please also be informed that the Board considers that the pre-application consultation process in respect of this proposed development is now closed.

In accordance with section 146(5) of the Planning and Development Act, 2000, as amended, the Board will make available for inspection and purchase at its offices the documents relating to the decision within 3 working days following its decision. This information is normally made available on the list of decided cases on the website on the Wednesday following the week in which the decision is made.

The attachment contains information in relation to challenges to the validity of a decision of An Bord Pleanála under the provisions of the Planning and Development Act, 2000, as amended.

Please also find attached a list of prescribed bodies to be notified when making the application.

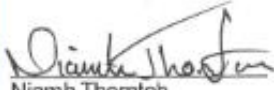
If you have any queries in relation to the matter please contact the undersigned officer of the Board.

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

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
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Yours faithfully,



Niamh Thornton
Executive Officer
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