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An Bord Pleanála,
Strategic Infrastructure Development Department,
64 Marlborough Street,
Dublin 1,
D01 V902

9th August 2024
[Hand Delivered]

RE: PROPOSED DEVELOPMENT OF A 110KV SUBSTATION AND GRID CONNECTION TO THE ADJACENT KNOCKRAHA 220KV SUBSTATION, ON LANDS AT KNOCKRAHA EAST, BALLYNANELAGH, AND KILLEENA, CO. CORK

1.0 INTRODUCTION

1.1 Context

Ballyvatta Solar Farm Ltd.[1] ('the Applicant') has retained Tom Phillips and Associates, Town Planning Consultants[2] to prepare and submit this planning application to An Bord Pleanála (ABP), under Section 182A of the Planning and Development Act 2000, as amended ('the Act'), in relation to the proposed development consisting of the construction of a new tail-fed 110 kilovolt (kV) substation and grid connection ('Proposed Development') to the adjacent Knockraha 220kV substation, approximately 150 metres (m) to the south. The Proposed Development is being sought to provide the necessary infrastructure to support the development, as well as secure and transport the supply of electricity from the permitted Ballyvatta Solar Farm, approximately 1.7 kilometres (km) to the north-east of the Subject Site, to the grid.

1.2 Pre-application Consultation

Pre-application consultation under An Bord Pleanála Reg. Ref. ABP-319155-24 determined that the proposal would fall within the scope of section 182A of the Planning and Development Act 2000, as amended, and the proposal is therefore Strategic Infrastructure Development ('SID') and the application should be submitted directly to the Board. The pre-application process was formally closed by letter dated 21st June 2024 and the submission of this planning application to ABP has been informed by that process. We refer to ABP letter dated 8th May 2024, which provided a written record of the pre-application meeting of the 23rd April 2024, and it stated, *inter alia*, that:

[1] Building 3400, Cork Airport Business Park, Cork, T12 AE76
[2] 80 Harcourt Street, Dublin 2, D02 F449

Item Raised by ABP	Applicant's Response
A robust application should include all necessary elevation and plan drawings.	A full set of planning drawings, prepared by TLI Group, including detailed site plan, elevations and sections is submitted in support of this planning application.
Hedgerow removal to be quantified in metres linear, although not appearing that the relevant EIA threshold will be breached (S.I. 383/23)	30m metres linear of hedgerow would be removed. The planning application is accompanied by an Environmental Impact Assessment Screening, prepared by Tom Phillips and Associates, to demonstrate that the proposal would not be likely to result in significant environmental impacts. We expand upon this at Section 2.8 of this Cover Letter. A Stage 1 Appropriate Assessment Screening, was prepared by Malone O'Regan Environmental, and is submitted in support of this application. A hydrological connection between Cork Harbour SPA and the Subject Site via the drainage network was identified. Therefore, a precautionary approach was applied and further detailed consideration through a Stage 2 Natura Impact Assessment concluded that avoidance, design requirements and mitigation measures will ensure that impacts to the SPA will be avoided and there will be no adverse impacts on the integrity or conservation status of any European sites. We expand upon this at Section 2.7 of this Cover Letter.
An archaeological assessment should be undertaken as records show a number of recorded monuments to the north, west and south of the Subject Site.	An Archaeological Assessment, prepared by IAC Archaeology, is submitted with this application. It describes how archaeological test trenching was conducted and that one area of archaeological potential was identified within the site. The Assessment recommends that a suitably qualified archaeologist, under licence from the NMS, carry out topsoil stripping and preservation by record (through archaeological excavation) of any identified archaeological features and deposits, prior to the commencement of construction of the Proposed Development, and monitoring of areas outside of the test trenched areas at the topsoil stripping stage. There will not be any significant impacts on archaeology or cultural heritage arising from the proposed development. We expand upon this at Section 2.3 of this Cover Letter.
Recommend that a Landscape and Visual Impact Assessment and Photomontages be submitted with the proposed application with	Macroworks have been engaged to prepare the accompanying Landscape and Visual Impact Assessment (LVIA) and Landscape Mitigation

an emphasis on cumulative effects; with short, medium and long views incorporated from the north, so the solar farm is captured.	Plan. It concludes that there will not be any significant landscape or visual impacts arising from the Proposed Development. We expand upon this at Section 2.2 of this Cover Letter.
Explore the use of an informal stone track as an access point to the Subject Site, to the west of the Knockraha substation, as this had been indicated as the proposed cable run route at the pre-application stage. This could minimise land take. If unavailable, this can be justified at the application stage.	We note that the preliminary design, presented at the pre-application consultation phase, has been amended. Neither the cable run route, nor the access point to the Subject Site, will be delivered to the west of the Knockraha substation, due to land ownership restrictions. The proposed access would now consolidate the cable run route to decrease land take and to streamline infrastructural provision. This will improve the future operation and maintenance of the development and will be consistent with land ownership folios.
Recommend engagement with the local authority roads department to discuss roadworks, opening licence or any required road closures.	Section 2.6 of this Cover Letter describes the construction and environmental management proposals, and an Outline Construction Traffic Management Plan ('OCTMP'), prepared by Punch Consulting Engineers, is submitted in support of this application. It outlines construction traffic controls and management proposals that will safeguard against negative environmental impacts, and will ensure the safe and efficient operation of the local road network during the construction phase of the proposed development. The construction contractor, once appointed, will engage directly with Cork County Council's road department to agree licence requirements and road closures, which will be limited to the works on the grid connection route which overlaps with the public road in one specific stretch.

Table 1: Table of Pre-application Items Raised and Response

1.3 Site Location

The Subject Site is located on agricultural land reached via a private access track to the south-west of a farmyard to the rear of a dwelling (Glen View, T56 Y177) at Knockraha East, Co. Cork. The Proposed Development includes a substation compound and access track which would be accessed via a new site access from the Ballynanelagh Road to the south of the Subject Site. The proposed cable route follows the proposed access track south and under the L6989, via horizontal directional drilling, into a field on the south side of the road, before returning to the road, running a length westward before connecting into the existing Knockraha substation. The application site is approximately 5.5 hectares (ha) in area (total red line boundary area).

The surrounding area is characterised by agricultural land traversed by 220kV and 110kV powerlines connecting to the adjoining Knockraha 220kV substation located circa 150

metres south of the application boundary. There are associated farm structures and one-off houses on the approach roads.

Figure 1: Indicative Location of the Proposed 110kV Tail-Fed Substation, marked with Red Star, on Lands North of the Knockraha 220kV substation (Source: Google Earth)

1.4 Site Selection

The proposed location of the substation has primarily been informed by the permitted Ballyvatta Solar Farm (CCC Reg. Ref. 17/5370; ABP-300434-17 and CCC Reg. Ref. 23/4564) approximately 1.7km to the north-east of the Subject Site, which requires a connection to the grid to operate. The Subject Site was selected based on the site context:

- It has appropriate separation distances from sensitive receptors,
- Allows buffers between local constraints,
- Is an efficient location close to the existing 220kV substation,
- The deliverability of the required cable route (shorter runs of cabling and track),
- Good proximity to the access road which will facilitate safe, convenient and efficient access for maintenance during the lifetime of the development,
- The proposed layout has been designed to avoid potential disruption to existing infrastructure and services, while minimising land take.
- Has favourable environmental characteristics including drainage and topography (gently sloping).
- Requires a less invasive intervention on the land and retains existing hedgerow boundaries and field patterns in so far as possible.

In addition, the accompanying LVIA describes a mitigation by avoidance measure, which has been employed in the siting of the Proposed Development, in a robust landscape context that already comprises electrical infrastructure. The Proposed Development will not appear as an incongruous or inappropriate built feature. The local area avails of a notable degree of

existing vegetative screening and the Proposed Development will not be a highly prominent feature in the surrounding landscape context.

1.5 Relevant Planning History

We note that there have been a number of recent applications, including those relating to electricity infrastructure seeking to tie into the Knockraha 220kV substation, in the vicinity of the Subject Site. The Proposed Development is sought to serve the permitted Ballyvatta Solar Farm, as detailed below.

Ballyvatta Solar Farm Permissions

Ref: No.	Summary of Development Description	Decision	Decision Date
17/5370; ABP-300434-17	Construction, operation and decommissioning of photovoltaic solar farm comprising photovoltaic panels on ground mounted frames within a site of up to 48.4ha, to include inverter stations, 1 no. DNO substation, customer substation, switcher substations, field transformers, auxiliary transformers, GRP cabinets, monitoring house, single storey storage shed, battery containers, transformer containers, WC, fencing, temporary construction compound, access tracks, CCTV cameras, landscaping and all associated ancillary development works.	ABP Grant permission	20th July 2018
23/4564	Amendment of previous permission Reg. Ref: 17/5370 and ABP- 300434-17, which includes a enlarged site boundary, for alterations to an permitted solar farm to provide an additional area of 7.8ha to the south comprising photovoltaic panels on ground mounted frames, MV/inverter stations, fencing, access tracks, CCTV cameras, a weather station, landscaping and all associated ancillary development works. The development also includes a 2.25km cable route to the south to provide a link to a future substation and all associated ancillary development works. The application also seeks to amend Condition 3 of permission granted under Reg. Ref:17/5370 and ABP Ref: ABP-300434-17 to increase the lifespan of the permitted solar farm from 25 to 35 years.	Cork County Council Grant permission with conditions	6th March 2024

Table 2: Table of Planning History Relating to the Proposed Development

Adjacent Electricity Infrastructure Permissions

23/04234	Permission is sought for Island Stability Services Limited are applying for a 10 year planning permission to develop a low carbon inertia services (LCIA) grid support facility, which will connect to the adjoining ESB Knockraha 220kV Electricity Substation. The proposed development will have a projected life span of 50 years. The development is to be located within a site compound c. 2.2 ha and will consist of the following elements: The development and operation of a 150 to 500 MVA (electrical rating) synchronous condenser. Compound building housing synchronous condenser generator and flywheel (c.512m2 c.12m high); Customer substation (c.250m2 c.7m high) and TSO substation (c.375m2 c.9m high), Cooling equipment, 6 No. modular containers to house electrical and control equipment, generator step-up transformer, auxiliary transformer and electrical plant including an external circuit breaker; 1 no. firefighting water tank and pump, boundary fencing (c.3m high) and CCTV, connection to the neighbouring ESB Substation and all other ancillary site works including access roads.	Refused	25th January 2024
23/5992	A ten year planning permission for an energy storage facility comprising; 1) energy storage containers installed on concrete plinths; 2) electrical inverters and transformers; 3) underground electrical and communications cabling; 4) the upgrade of an existing agricultural access point from the L6989; 5) on-site access track; 6) security fencing and security gates; 7) pole-mounted security cameras; 8) all associated and ancillary site development, landscaping and reinstatement works. The operational lifetime of the proposed development is 35-years. This planning application is accompanied by an Appropriate Assessment Screening report.	Cork County Council Grant permission with conditions	10th July 2024

Table 3: Table of Planning History in the Surrounding Area

1.6 Proposal

The Proposed Development description as per the statutory notices is as follows:

"The proposed development will consist of a 10 year permission for a 110kV electrical substation and associated 110kV infrastructure required to connect a solar farm (permitted under Cork County Council Reg. Ref: 23/4564; which amended previous permission Reg. Ref: 17/5370 and ABP-300434-17) to the existing Knockraha 220kV substation.

The substation compound will include 2 No. single storey control buildings:

- *An EirGrid control building (comprising relay room, battery room, workshop/store, mess room and W.C, and generator room); and,*
- *An Independent Power Producer control building (comprising control room, switchgear room, office, store and W.C);*

The proposal also includes:

- *110kV grid transformer and two-house transformers within bunded enclosures (height approximately 6m) and associated infrastructure;*
- *MV switchgear containers;*
- *Lightning protection masts;*
- *Perimeter security fencing and entrance gates;*
- *Security lighting;*
- *Telecommunication dishes;*
- *Underground cabling;*
- *Site drainage infrastructure;*
- *Proposed access from the L6989 to the south;*
- *Temporary construction compound; and,*
- *All associated development works above and below ground including landscaping."*

The Proposed Development would be built for the purpose of providing a connection from an associated, but separate, solar array approximately 1.7km to the north-east of the Subject Site and transporting its electricity to the national grid. It will comprise 2 No. separate compounds including an EirGrid compound with substation and electrical infrastructure and an Independent Power Producer (IPP) or customer owned compound including a switchgear building, a 110kV transformer and other electrical infrastructure.

It will be served by a new access track from the L6989 to the south of the proposed substation compound which will result in the removal of approximately 30m of hedgerow. The creation of the new site entrance will require the translocation of existing hedgerow to facilitate required sightlines. Existing hedgerows will be maintained where possible, and a number of new hedgerows will be introduced along the boundaries of the proposed substation compound to increase screening from external areas.

The proposed grid connection follows the access track, under the L6989 using horizontal directional drilling (HDD) which will exit south of the L6989, before returning to the road, running a length westwards before connecting into the existing Knockraha substation.

A temporary construction compound is proposed at the north-east of the Subject Site. The location of the compound has been selected for ease of access, directly off the entrance track, at a safe clearance distance from the overhead powerlines, to minimise the land take

of the site (albeit for a temporary period), and to cause the least disturbance to the receiving environment.

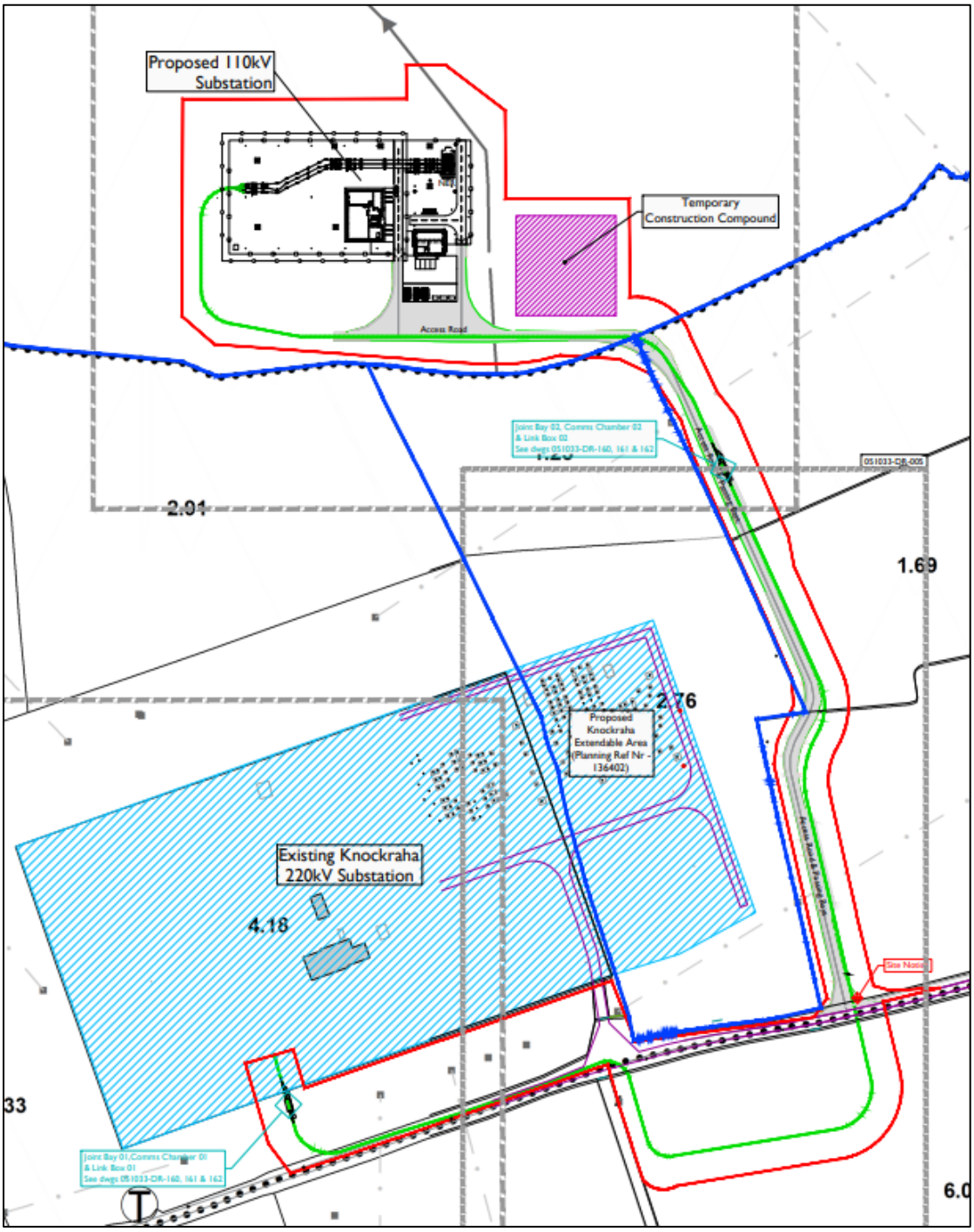

Figure 2: Extract of Layout of the Proposed 110kV Substation Compound and Grid Connection

2.0 STRATEGIC INFRASTRUCTURE DEVELOPMENT ASSESSMENT

2.1 Principle of the Development

The Proposed Development is being sought to connect the Ballyvatta Solar Farm (permitted and located approximately 1.7km to the north-east) of the Subject Site, to the national grid, via the adjacent Knockraha 220kV substation, approximately 150 metres to the south of the Subject Site.

National Planning Policy, and Energy and Climate Frameworks

The National Planning Framework (NPF) focuses on the *'Transition to a Low Carbon and Resilient Society'* (National Strategic Outcome [NSO] 8) and recognises the need to harness solar energy sources and deliver 40% of our electricity needs from renewable sources. It acknowledges that transmission grids will be necessary to achieve a more distributed, renewables-focused energy generation system. It further acknowledges the need to locate such facilities in a rural setting while also protecting the integrity of the environment and respecting the needs of people who live in rural areas (Section 5.4). It is a National Policy Objective (NPO 55) to promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050.

In addition, frameworks to outline proposals to speed up the country's shift to increased energy efficiency and indigenous renewable energy systems, in the context of the war in Ukraine, and to integrate energy, climate, enterprise and digitalisation policy ambitions have provided clarity to ensure a secure transition and to halve our emissions by 2030 and reach net zero no later than 2050. A target has been set to achieve 80% of Ireland's energy production from renewable sources by 2030 (8GW of that to be produced by solar energy). These include:

- National Energy Security Framework April 2022
- Energy Security in Ireland to 2030 Energy Security Package November 2023
- Climate Action Plan 2023
- Ireland's National Energy and Climate Plan 2021-2030

Regional Spatial Economic Strategy (RSES)

The Southern Region's RSES provides a regional policy position for the consideration of renewable energy in land-use planning. It seeks to leverage the Region as a leader and innovator in sustainable renewable energy generation (RPO 95 – Sustainable Renewable Energy Generation). It supports the integration of renewable energy sources through sustainable development, maintenance and upgrading of the electricity grid (RPO 96 – Integrating Renewable Energy Sources). It supports indigenous renewable energy production and grid injection (RPO 100); supports the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers (RPO 219); and supports the development of safe, secure and reliable supply of electricity and supports new transmission infrastructure projects (RPO 222).

Cork County Development Plan 2022-2028

The Subject Site is located within the County Metropolitan Cork Strategic Planning Area. County Development Plan Objective CS 2-3: County Metropolitan Cork Strategic Planning Area (l) is to:

> *"Facilitate the development of renewable energy projects in support of national climate change objectives."*

Chapter 13 of the CDP relates to energy and telecommunications and notes that a radical transformation of our energy system is required to meet national European and international climate policy objectives.

Objective ET13-22 Transmission Network states:

> *a) To co-operate and liaise with statutory and other energy providers in relation to power generation in order to ensure adequate power capacity for the existing and future needs of the County including business and residential demands.*
>
> *b) Proposals for new electricity transmission networks will need to consider the feasibility of undergrounding or the use of alternative routes especially in landscape character areas that have been evaluated as being of high landscape sensitivity. This is to ensure that the provision of new transmission networks can be managed in terms of their physical and visual impact on both the natural and built environment and the conservation value of European sites.*
>
> *c) Proposals for development which would be likely to have a significant effect on nature conservation-sites and/or habitats or species of high conservation value will only be approved if it can be ascertained, by means of an Appropriate Assessment or other ecological assessment, that the integrity of these sites will not be adversely affected.*

We submit that there is strong policy support for the Proposed Development at national, regional and County Development Plan level.

2.2 Design and Visual Impact

The proposal will include 2 No. single storey buildings with slate finished pitched roofs and napped render finished walls and uPVC fascia and rainwater goods. The EirGrid building would have a maximum height to roof ridge of approximately 8.7m. The Independent Power Producer building would have a maximum height to roof ridge of approximately 6m.

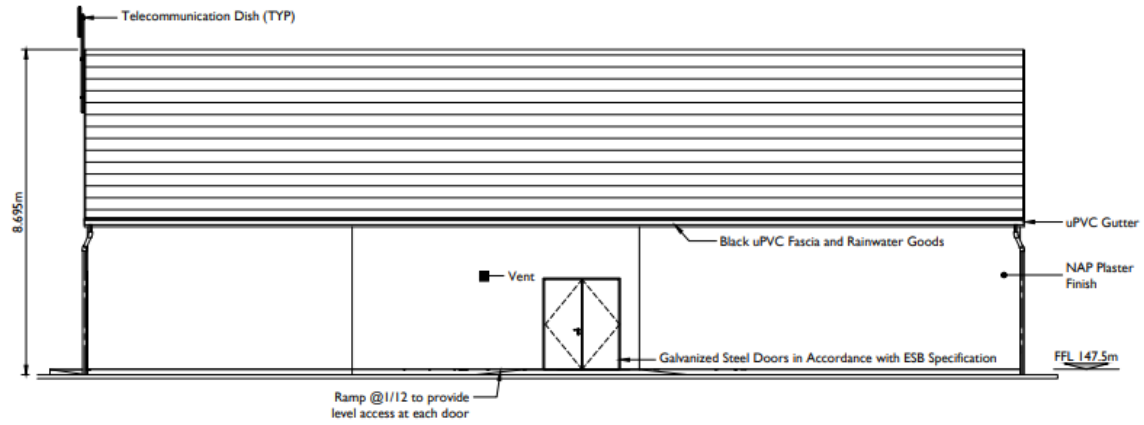

Figure 3: East Elevation of Proposed EirGrid Building

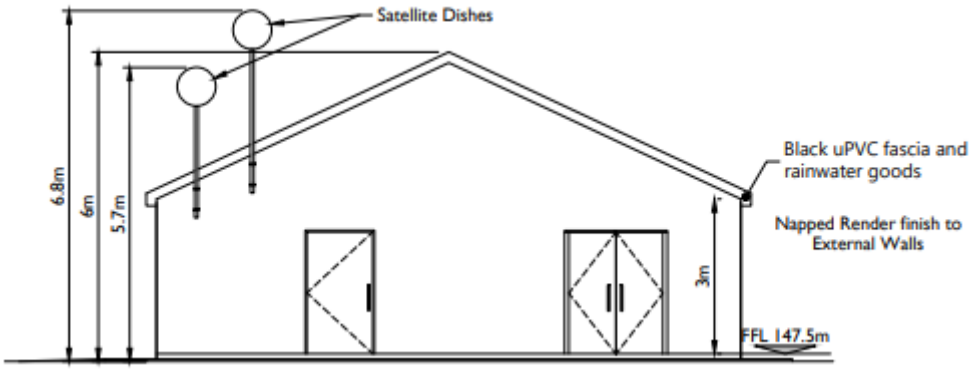

Figure 4: East Elevation of Proposed IPP Building

There would be lightning protection masts with a height of approximately 18m. These would be the tallest elements of the Proposed Development but their slender form would allow them to appear less imposing in the context of the existing backdrop which includes the operational 220kV Knockraha substation, the overhead masts and associated infrastructure serving that development.

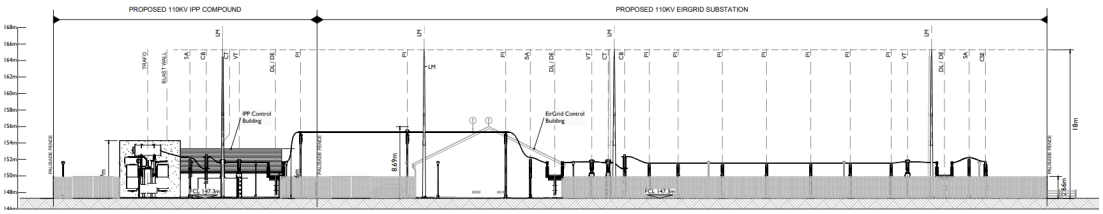

Figure 5: Site Section Showing Proposed Heights Through Compound

Due to nature and use of the Proposed Development, the compound would be secured by perimeter security fencing and accessed through gates.

The proposed siting of the substation compound would be set back a substantial distance from the public road, allowing it to appear discreet when observed from the public approach road (the L6989 to the south).

The proposed access track to the compound would be perpendicular to the L6989 and would run alongside existing field boundaries. This would ensure the continued functionality of those impacted fields and would allow the track to benefit from the screening providing by the existing landscape and minimise hedgerow loss.

The accompanying LVIA has been prepared by Macroworks. It concludes that the landscape within the study area is robust and already influenced by existing large-scale electrical infrastructure. The landscape sensitivity is deemed to be 'Medium-low'. The impact on landscape character (post-construction) will be of 'Moderate-slight' significance and a 'Negative quality'.

Photomontages are provided in support of the assessment of visual impacts from 5 No. selected viewpoints. The overall significance of visual impacts ranged between 'Slight-imperceptible' (VP5) and 'Imperceptible' (VP1 to VP4). This is principally a consequence of the high degree of existing screening located within the intervening low-rolling landscape, which heavily reduces the visual exposure of the Proposed Development.

In terms of cumulative impacts with other existing and consented developments, the LVIA concludes that there will be very limited potential for clear views of more than one development at a time following the establishment of mitigation planting. Cumulative visual effects are deemed to be no greater than Slight-imperceptible/Negative/Long Term, and it is not considered that any significant cumulative impacts will arise from the Proposed Development in conjunction with other existing or cumulative developments. A Landscape Mitigation Plan accompanies the LVIA for completeness.

Figure 6: Extract from the LVIA Showing the Outline View of the Proposed Development As Imperceptible Irrespective of Screening

We submit that there will not be any significant landscape or visual impacts arising from the Proposed Development.

2.3 Archaeology

An Archaeological Assessment, prepared by IAC Archaeology, is submitted with this application. It describes how archaeological test trenching was conducted, under licence from the National Monuments Service (NMS), and that one area of archaeological potential (AA1, an area of small localised burnt mound deposits) was identified within the site. It explains that groundworks (ground disturbances such as topsoil stripping and excavation to formation depth) associated with the Proposed Development will adversely impact AA1. The

Assessment recommends that prior to the commencement of construction, that AA1 is subject to topsoil stripping and preservation by record (through archaeological excavation) of any identified archaeological features and deposits. This would be carried out by a suitably qualified archaeologist under licence from the NMS. It is also recommended that all topsoil stripping associated with the development be monitored by a suitably qualified archaeologist to prevent potential impacts (by ground disturbances) on small-scale or isolated archaeological features or deposits that have the potential to survive beneath the current ground level, outside of the footprint of the excavated trenches.

We submit that there will not be any significant impacts on archaeology or cultural heritage arising from the proposed development.

2.4 Operational Noise Impact

A Noise Impact Assessment, Prepared by Wave Dynamics Acoustic Consultants, is submitted with this application. It concludes that the construction noise impact is predicted to achieve the industry standard criteria without mitigation therefore no significant noise impact is anticipated from the construction phase of the development. It also concludes that operational noise (daytime and nighttime) from the Proposed Development would be unlikely to have a significant effect at the noise sensitive receptor locations identified in the study. The assessment concludes that the Proposed Development, either alone or in-combination with other plans or projects, would not result in significant noise effects).

We submit that there will not be any significant noise impacts arising from the proposed development.

2.5 Site Specific Flood Risk Assessment

A Site Specific Flood Risk Assessment ('SSFRA'), prepared by Punch Consulting Engineers, is submitted in support of this application. It has been prepared to identify any potential sources of flooding and to identify the likely routes of flood waters, relating to the site. It is concluded that the Subject Site is in Flood Zone C and is therefore considered to be at low risk of flooding and is deemed an appropriate location for the proposed development provided that the residual risk of pluvial flooding is addressed by on site surface water drainage. Proposed mitigation measures to ensure runoff will not impact local flood risk are detailed on the submitted drawings.

2.6 Construction and Environmental Management

An Outline Construction Environmental Management Plan ('OCEMP'), prepared by Punch Consulting Engineers, is submitted in support of this application. It outlines mitigation measures and monitoring proposals that will safeguard against negative environmental effects during the construction phase of the Proposed Development.

An Outline Construction Traffic Management Plan ('OCTMP'), prepared by Punch Consulting Engineers, is submitted in support of this application. It outlines construction traffic controls and management proposals that will safeguard against negative environmental effects, and

ensure the safe and efficient operation of the local road network during the construction phase of the proposed development.

A Noise Impact Assessment, Prepared by Wave Dynamics Acoustic Consultants, is submitted in support of this application. It concludes that the predicted construction noise and vibration impact from the proposed development would comply with recognised best practice standards typically adopted.

We submit that there will not be any significant construction impacts arising from the proposed development.

2.7 Appropriate Assessment

A Stage 1 AA Screening, was prepared by Malone O'Regan Environmental, and is submitted in support of this application. The boundaries of two designated sites were screened out. These are Great Island Channel SAC and Blackwater River SAC. It was concluded that the Proposed Development will not, either alone or in combination with other plans or projects, be likely to have significant effects on these European Sites.

A hydrological connection between Cork Harbour and the Subject Site via the drainage network and the wider watercourse network was identified. This forms part of the Cork Harbour SPA. As potential significant effects on a European Site had been identified, and in the absence of appropriate mitigation, a precautionary approach was applied. Further detailed consideration through a Stage 2 NIS concluded that avoidance, design requirements and mitigation measures will ensure that any impacts on the Cork Harbour SPA or any other European site, having regard to their conservation objectives, will be avoided during all phases of the Proposed Development, such that there will be no adverse effects on the integrity of any European sites. It concludes:

> *"Following an examination, analysis and evaluation of the relevant information, including the nature of the predicted impacts from the Proposed Development and all associated works, it has been objectively concluded that with the implementation of the proposed mitigation measures, the Proposed Development will not, either alone or in combination with other plans or projects, adversely affect the integrity or conservation status of any of the qualifying interests of the Cork Harbour SPA or any other European site in light of best scientific knowledge. No reasonable scientific doubt exists in relation to this conclusion.*
>
> *Accordingly, progression to Stage 3 of the Appropriate Assessment process (i.e Assessment of Alternatives Solutions) is not considered necessary."*

2.8 EIA Screening

We submit that the proposed development is not a project defined in Part 1 and Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended, requiring a mandatory Environmental Impact Assessment Report (EIAR).

As described in Section 1.2 of this Cover Letter, the issue of hedgerow removal was raised at the pre-application consultation stage, and it was advised that this should be quantified in

metres linear at the planning application stage, to demonstrate that the relevant EIA threshold will not be breached (S.I. 383/23). The proposed site entrance will result in the translocation of existing hedgerows to facilitate required sightlines, the proposed access track will result in the loss of 30m linear of existing hedgerow, however it is proposed to introduce new hedgerows along the boundary of the proposed substation to increase screening from external areas.

An EIA Screening Assessment, prepared by Tom Phillips and Associates, accompanies this application. The assessment provides the relevant information on the characteristics of the proposal under consideration and its likely effects.

It has been assessed that the Proposed Development does not trigger the mandatory criteria for a full EIA as set out within Schedule 5 Part 1 and Part 2 of the Planning and Development Regulations. A sub-threshold assessment of the likely significant environmental effects of the Proposed Development in accordance with the criteria outlined within Schedule 7 of the Planning and Development Regulations 2001 (as amended) was carried out to determine whether the Proposed Development is likely to have significant effects on the existing environment, requiring a full EIAR.

Taking into consideration embedded mitigation and assuming works will be carried out in accordance with the OCEMP and OCTMP, we submit that an EIA is not required for the Proposed Development. We request that the Board concludes that there is no real likelihood of significant effects on the environment arising from the proposed development and an EIA is not required.

3.0 CONCLUSION

This planning application is submitted directly to the Board in accordance with section 182A of the Planning and Development Act 2000, as amended.

We submit that the Proposed Development, by reason of the Subject Site selection, the location and characteristics of the receiving environment, and the mitigation measures recommended in the accompanying supporting technical documents, when combined with the policy framework support for the use, is consistent with the proper and sustainable development of the area.

We look forward to written acknowledgment of receipt from ABP in due course.

If you have any queries in relation to any aspect of this letter, please do not hesitate to contact me.

Yours sincerely,

Stephen Barrett
Director
Tom Phillips + Associates

Encl.

The following items are submitted in support of this SID Planning Application:

- A copy of this Planning Cover Letter, prepared by Tom Phillips + Associates.
- Completed and signed SID Application Form
- SID planning application fee for Section 182A of the Act, of €100,000 was paid to ABP via EFT on 24th July 2024 under reference 'Ballyvatta 110kV'.
- Copy of Site Notice, erected 09 August 2024
- Copy of Newspaper Advertisement, Irish Examiner, published 09 August 2024
- Copy of Newspaper Advertisement, The Evening Echo, published 09 August 2024
- List of prescribed bodies consulted
- Site Specific Flood Risk Assessment, prepared by PUNCH
- Appropriate Assessment (Screening and NIS), prepared by Malone O'Regan
- Screening for Environmental Impact Assessment, prepared by Tom Phillips and Associates.
- Landscape and Visual Impact Assessment, prepared by Macroworks
- Archaeological Assessment, prepared by IAC
- Noise Impact Assessment, prepared by Wave Dynamics
- Outline Construction and Environmental Management Plan, prepared by PUNCH
- Outline Construction Traffic Management Plan, prepared by PUNCH

- Planning application drawing pack, prepared by TLI Group and Macro Works, as detailed in the table below.

Title	Drawing No.	Revision
Overall Site Layout Plan	051033-DR-001	P2
Overall Site Location Map	051033-DR-002	P2
Site Location Map	051033-DR-003	P2
Site Layout Plan (1:500) Sh 1 of 3	051033-DR-004	P2
Site Layout Plan (1:500) Sh 2 of 3	051033-DR-005	P2
Site Layout Plan (1:500) Sh 3 of 3	051033-DR-006	P2
Proposed 110 kV Substation-Site Layout Plan	051033-DR-100	P2
Proposed 110 kV Substation-Elevations	051033-DR-101	P2
Proposed 110 kV Substation-Section A-A	051033-DR-102	P2
110kV Substation-EirGrid Control Building	051033-DR-110	P1
110kV Substation-IPP Control Building	051033-DR-111	P1
Proposed 110kV Substation-Gate and Fencing Details	051033-DR-120	P1
110kV Substation-Drainage Details	051033-DR-121	P1
110kV Substation-Site Compound Details	051033-DR-122	P1
Proposed 110kV Substation-Lightning Monopole Details – 18m Mast	051033-DR-123	P1
110kV Ducting Through Regional / Local Roadways and Public Road Reinstatement with ECC	051033-DR-150	P2
110kV Ducting in Access Track with ECC Duct	051033-DR-151	P2
110kV Ducting in Flat Formation with ECC Duct	051033-DR-152	P2
Trench Sections for Crossing Existing Culvert / Services Undercrossing	051033-DR-153	P2
Trench Sections for Crossing Existing Culvert / Services Overcrossing	051033-DR-154	P2
Joint Bay Section Detail	051033-DR-160	P2
C2 Chamber Details	051033-DR-161	P2
Typical Link Box Chamber Details	051033-DR-162	P2
HDD - Celtic Interconnector Crossing	051033-DR-170	P2
Cut & Fill Volume_Site Layout Plan	051033-DR-300	P1
Cut & Fill Volume_Sections	051033-DR-301	P1
Swept Path Analysis_Transformer Delivery Truck	051033-DR-305	P1
Swept Path Analysis_Fire Truck	051033-DR-306	P1
Site Entrance Sight Lines	051033-DR-310	P1
Typical Culvert Crossings	051033-DR-315	P1
Drainage Layout Plan	051033-DR-330	P1
Drainage Details_Sheet 1/2	051033-DR-331	P1
Drainage Details_Sheet 2/2	051033-DR-332	P1

Landscape Mitigation Plan		

4.0 LIST OF PRESCRIBED BODIES CONSULTED ON THE PROPOSAL

- Minister for Housing, Planning and Local Government
- Minister for the Environment, Climate and Communications
- Cork County Council
- Commission for Regulation of Utilities, Water and Energy
- Health and Safety Authority