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The SID Division,
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13 October 2023

Request under Section 146B of the Planning and Development Act, 2000 (as amended) for Proposed Alterations to the Approved Celtic Interconnector Project at Knockraha, Co. Cork

Dear Sir/ Madam,

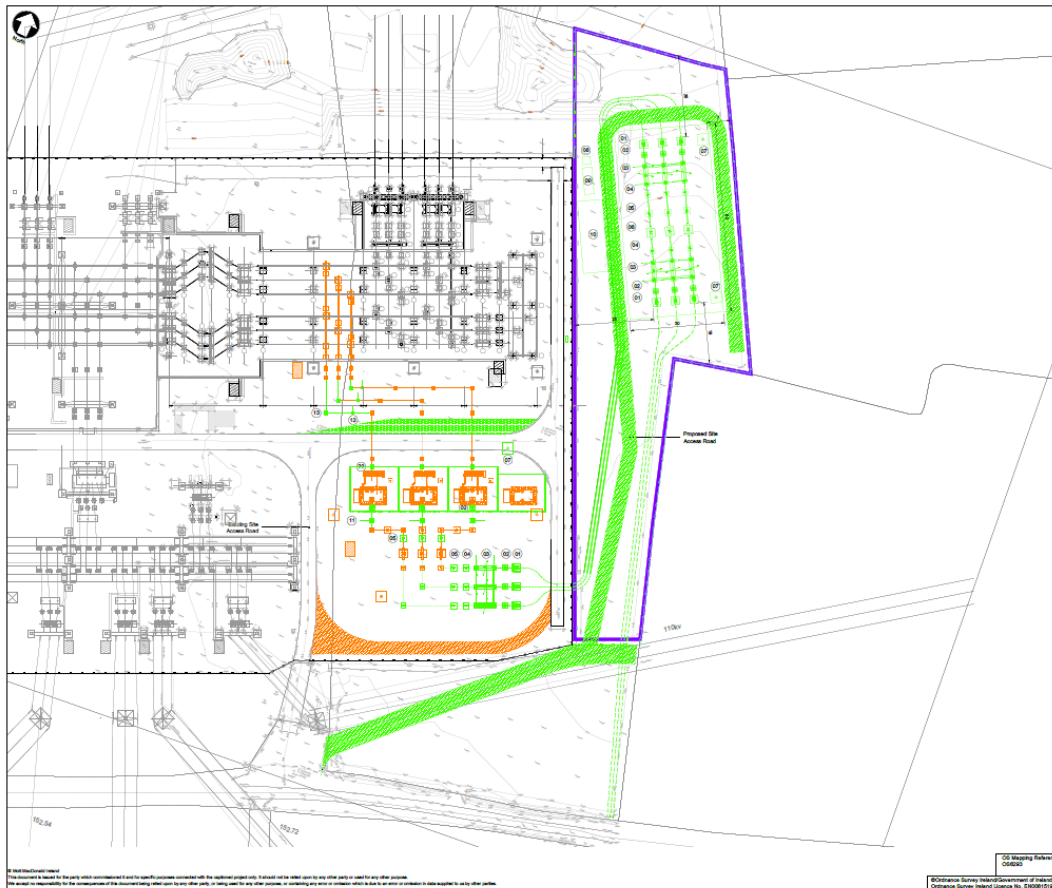
We wish to submit a request for alterations to the previously Approved Celtic Interconnector project (ABP Reference ABP-310798-21).

This request is submitted in accordance with Section 146B of the Planning and Development Act 2000 (as amended) which enables the Board to alter the terms of the development the subject of a planning permission, approval or other consent granted under the Act.

Approval for the Ireland onshore element of the Celtic Interconnector project – a Project of Common Interest (PCI) and Strategic Infrastructure Development (SID) - was originally Granted by An Bord Pleanála (ABP) in May 2022.

Subsequently, in July 2023, ABP made a decision to alter the terms of the development per Section 146B of the 2000 Act (as amended), relating specifically to the area of the existing ESB Networks (ESBN) substation at Knockraha, Co. Cork, which comprises the grid connection point of the Celtic Interconnector (ABP Ref. VM04.316191). This alteration in summary comprised the provision of a Cable Sealing End (CSE) compound on ESBN lands immediately to the east of the existing substation; this comprises the interface between the EirGrid-owned interconnector, and the ESBN-owned substation.

For the convenience of ABP, a plan of the now Approved CSE development per ABP Ref. VM04.316191 is reproduced below.



Approved Cable Sealing End (CSE) compound and associated access road and entrance per ABP Ref. VM04.316191

As identified in green in the drawing above, the internal road network extending to the public road from the CSE compound runs effectively in parallel with an existing 110kV overhead line (OHL) as it enters the existing substation from the east. The western end of this internal access road extends to the existing bell-mouth entrance to the ESNB substation.

The project is now in the construction phase, including detailed design activities by appointed contractors. As part of this detailed design process, a number of issues with the now Approved entrance and internal access road at the Knockraha CSE compound have come to light. In summary, these are:-

- The creation of an internal access road, both for construction and operation, parallel to and under an existing live overhead high voltage line, has significant potential health and safety implications, and is not considered good practice, particularly where this can be avoided. It is normal practice, where possible, to cross under a live line by a perpendicular crossing, to minimise the distance to be travelled under the line.

- It is established construction practice relating to other projects at the Knockraha substation, in collaboration with the local community, that all construction traffic travels to and from the east of the substation; in effect construction traffic approaches the substation area from the east and will only exit the substation by means of a left-turn (eastwards). EirGrid as a responsible developer has instructed its contractors to continue this arrangement. This however, means that construction traffic would require to undertake a “hairpin” manoeuvre both accessing and egressing the construction site if it were to use the approved access.
- The existing bell-mouth entrance to the ESBN Knockraha substation is fronted to the public road by a concrete post and rail fence. This fence was installed by ESBN following engagement with the local community to discourage anti-social activity occurring at the entrance. It has emerged in detailed design that the existing fence would require to be removed to facilitate vehicular access to the CSE compound in both the construction and operational phases. Neither ESBN, EirGrid, nor the local community would welcome this.

Having regard to all the above, EirGrid is keen to ensure a safe and sustainable vehicular access to the CSE compound, that is acceptable to all parties, in particular to the Knockraha community, to ESBN as owners of the existing Knockraha 220kV substation, to the appointed contractors during construction, as well as to ongoing visitors to the site during the operational and maintenance phase of the Celtic Interconnector development.

For clarity, this S146B request builds upon the development Approved per ABP Ref VM04.316191, and is related only to the means of vehicular access to and within the site.

In summary, a new vehicular access point off and onto the local road is now proposed, at the south-eastern corner of the CSE compound site.

We advise the Board that this matter has been discussed with the Cork County Council Roads section who have not expressed any concern with the proposal given the location of the proposed access on a lightly trafficked local road.

The Proposed Development and Receiving Environment

As per Drg. No. P-020549_TC_13200.U#CE15&BLD010/001 – Site Layout – submitted with this request and reproduced below, the extent of the proposed modified development is coloured green. It comprises a realignment of the southern portion of the internal access road serving the Approved Cable Sealing End (CSE) compound, and a new vehicular access off and onto the local road at the south-eastern end of the overall ESBN landholding at Knockraha. This drawing illustrates the proposed access and internal road in the context of, and linking with, the CSE development as modified by ABP per Ref. VM04.316191.



Proposed Site Layout – new internal vehicular access and entrance at the Knockraha CSE compound

The proposed vehicular access occurs off and onto a lightly trafficked local road. Its location has been designed to maximise the distance from the existing vehicular entrance to the ESN substation compound (located approximately 75m to the west of the proposed access), in the interests of good traffic management and road safety.

The southern (roadside) boundary of the overall site comprises a ditch with planting over (see Photos 1 and 2 below). This has been examined by EirGrid’s Senior Ecologist and found to be of no particular ecological value. In any event, the Approved underground cables entering the CSE compound from the local road will require the removal of this portion of the ditch; for the avoidance of doubt, the proposed vehicular access will occur in the area where those previously Approved cables will enter the CSE compound area.

An existing field gate access occurs in the vicinity of the proposed access, already providing vehicular access to and from the subject site. This is proposed to be permanently removed, with the associated reinstatement of a planted ditch to match that existing on either side.

The proposed internal access road will be 6m in width, extending from a bell-mouth entrance which is c.21m in width at the road edge. The area of the proposed access already has good sightlines in each direction (see Photos 3 and 4).

The proposed design includes some local cutting back of the ditch, and ongoing vegetation management in order to ensure adequate sightlines from a 2.4m setback. This has been considered acceptable by EirGrid's Senior Ecologist, and there are no specimen or ancient trees within this currently unmanaged hedgerow.

Within the site, behind the roadside ditch, there is an existing concrete post and rail fence. A new gate will be created in the existing fence at the point where it crosses the proposed access road. The gap between the gate and roadside ditch in the vicinity of the entrance will be filled on both sides by a supplementary earthen berm to match that existing, such that in combination, this will comprise the sides to the proposed bell-mouth vehicular access. The proposed gate will tie into the new earthen berm and existing fence, and will therefore be c.1.2m in height, matching the height of the existing fence.

The internal access road will cross the existing 110 kV overhead line which crosses the site in a generally perpendicular alignment. This is preferable to the currently Approved arrangement where the road runs in parallel to that existing overhead line.

North of the existing overhead line on the internal access road, a 2.4m high security gate & palisade fence will be located immediately to the south of the CSE compound itself. The nature and design of the fence will match that existing at the ESNB Knockraha 220kV compound. For the convenience of the Board, we include Drg. No. 229100428-MMD-00-XX-DR-E-3060 – *Celtic Interconnector Converter Station Site (Ballyadam) Fence and Gate Details* submitted with the parent application for Approval, which details the similar palisade fence and gate that is now proposed to be installed at Knockraha.



Photo 1: view east from existing ESN Knockraha Substation entrance along local road towards the southern boundary of the Approved Cable Sealing End compound site



Photo 2: view to existing ditch at southern boundary of the Approved Cable Sealing End compound site at the location of the proposed vehicular access. This will require to be removed in any case to facilitate the laying of the Approved underground cables into the compound.



Photo 3: view of sightlines eastwards on local road from the proposed vehicular access at approximately 2 metre setback



Photo 4: view of sightlines westwards on local road from the proposed vehicular access at approximately 2 metre setback

The proposed development has been reviewed against the provisions of the parent Approval for the Celtic Interconnector project, including the EIAR and NIS submitted with that application, and the assessments and Order of ABP. It has also been reviewed against the terms of the S146B alteration and ABP Order.

The proposed development has also been reviewed by EirGrid's Senior Ecologist against the provisions of the Appropriate Assessment carried out by ABP in respect of the Approved Celtic Interconnector project, and the particulars informing that AA.

The conclusions of the reviews and appraisals undertaken allow EirGrid to respectfully submit that the Environmental Impact Assessment (EIA) and Appropriate Assessment (AA) undertaken by the Board for the overall development remain valid for the proposed alterations.

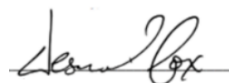
Furthermore, EirGrid's respectfully shares its conclusion that the proposed alterations to the Approved vehicular access to the CSE compound do not depart materially from the nature, extent and location of the previously Approved development; as such, it is concluded that they comprise a non-material alteration of the terms of the Approved development, though of course this is a decision ultimately for the Board.

The proposed alterations will facilitate the realisation of the project and is entirely in accordance with the principles of good planning practice, and with the principles of proper planning and sustainable development.

We look forward to hearing from the Board in due course.

To accompany this request for an alteration to a previously approved permission, an electronic payment of €30,000 has been made by EirGrid to ABP.

Yours sincerely,



Des Cox, B.A. (mod.), MRUP, MIPI, MRTPI

Planning and Environmental Lead,



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Schedule of Drawings:-

- P-020549_TC_13200.U#CE15&BLD010/001 – *Celtic Interconnector Knockraha Substation Section 146B Site Layout Proposed Amendments*
- P-020549_TC_12240.U#CE15&BLD010/002 – *Celtic Interconnector Knockraha Substation Section 146B Junction Layout Drawing*
- Drg. No. 229100428-MMD-00-XX-DR-E-3060 – *Celtic Interconnector Converter Station Site (Ballyadam) Fence and Gate Details*



