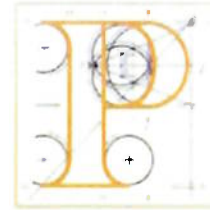


**Our Case Number: ABP-320832-24**



**An  
Bord  
Pleanála**

Laois County Council  
Áras an Chontae  
James Fintan Lalor Avenue  
Portlaoise  
Co. Laois  
R32 EHP9

**Date:** 19 September 2024

**Re:** Alteration Request in Accordance with Section 146B regarding Permitted Development  
PL11.VA0015 Laois-Kilkenny Reinforcement Project, 400kV/110kV Gas Insulated Substation.  
Located in the Townland of Coolnabacky, Co Laois

Dear Sir / Madam,

Please be advised that the Board has received a request in accordance with section 146B of the Planning and Development Act 2000, as amended, to alter PL11.VA0015.

A copy of the said request is enclosed herein for your information and may be made available for public inspection at the offices of the local authority.

Please be advised that, at this stage, you are not invited to make any submissions in relation to the matter to the Board.

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

Yours faithfully,

Raymond Muwaniri  
Executive Officer  
Direct Line: 01-8737125



MM02

Teil	Tel	(01) 858 8100
Glaio Áitiúil	LoCall	1800 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
D01 V902	D01 V902



**Our ref: IE000752 (Section 146B Request)**

West Pier Business Campus  
Dun Laoghaire, Co. Dublin  
A96 N6T7  
T +353 1 488 2900

Date: 12 September 2024

The Secretary,  
An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1,  
D01V902

Also, sent by email to: [laps@pleanala.ie](mailto:laps@pleanala.ie)

**RE: REQUEST UNDER SECTION 146B OF THE PLANNING AND DEVELOPMENT ACT 2000, AS AMENDED, FOR AMENDMENTS TO STRATEGIC INFRASTRUCTURE DEVELOPMENT APPROVED UNDER CASE REF. PL11.VA0015**

Dear Sir / Madam,

RPS Group Limited (RPS), on behalf of EirGrid Plc, The Oval, 160 Shelbourne Road, Ballsbridge, Dublin 4, D04 FW28, (the Requester), hereby submit a request to An Bord Pleanála (hereafter, ABP / the Board) under the provisions of Section 146B of the Planning and Development Act 2000, as amended (hereafter the Planning Act) to make what are considered by EirGrid to comprise minor amendments both in scale and nature to the previously Approved Strategic Infrastructure Development (SID) (the Laois-Kilkenny Reinforcement Project - Case Ref. PL11.VA0015).

The alterations being sought in this Section 146B request reflect the conclusion of the detailed design process undertaken by ESB Networks in specific respect of the approved Coolnabacky 400kV substation; in this regard, we request the Board to note that this submission relates only to the Approved substation and not to any other part of the Approved development.

We direct ABP's attention to the enclosed **Drawing No. IE000752-RPS-00-XX-DR-T-DG0010** (Site Layout Plan - Section 146B Amendment) which illustrates the alterations sought to the approved SID. This drawing should be reviewed alongside the detailed description in the following sections. Further, for clarity, **Drawing No. IE000752-RPS-00-XX-DR-T-DG0011** (Site Layout Plan - Consented Versus Sought Amendments) compares the approved development with those elements for which amendments are sought.

The appropriate fee of €30,000EUR has been paid to ABP by EFT.

## Background

This request seeks to alter the terms of the SID previously approved by ABP on 23<sup>rd</sup> April 2014 (Case Ref. PL11.VA0015). For convenience, a copy of the Board Order is enclosed with this letter.

The approved SID (Case Ref. PL11.VA0015) consists of an electrical transmission infrastructure development known as the *Laois-Kilkenny Reinforcement Project* in Counties Laois and Kilkenny. The Requester confirms that the construction of the overall approved SID is in progress.

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[rpsgroup.com](http://rpsgroup.com)

RPS Group Limited, registered in Ireland No. 91911  
RPS Consulting Engineers Limited, registered in Ireland No. 161581  
RPS Engineering Services Limited, registered in Ireland No. 99795  
The Registered office of each of the above companies is West Pier Business Campus, Dun Laoghaire, Co. Dublin, A96 N6T7

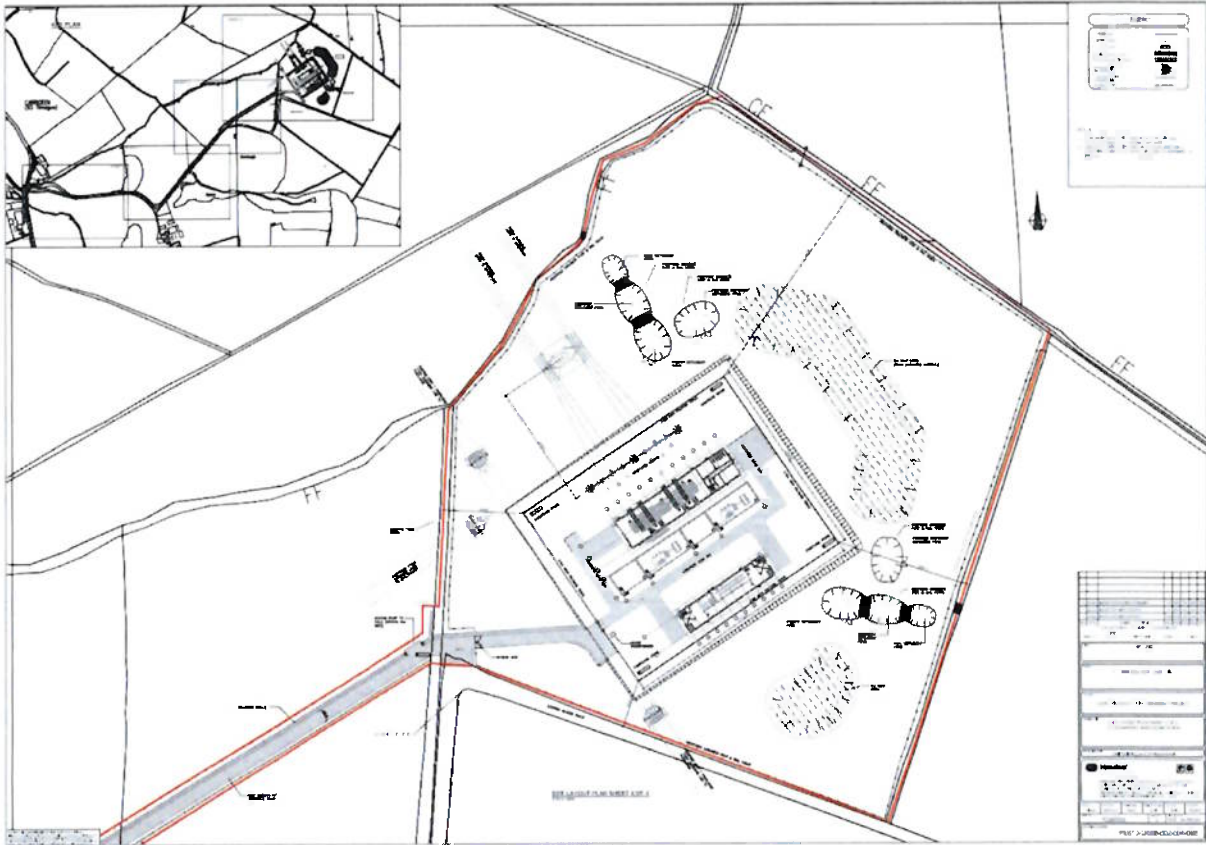


In summary, the approved SID (ABP Ref. PL.11.VA0015) comprises eight inter-related elements/units as follows:

- **Unit 1: A new 400kV/110kV Gas Insulated Substation (GIS) substation in the townland of Coolnaback, Co. Laois** (in bold, RPS emphasis)
- Unit 2: A new connection to the Coolnaback substation from the existing Moneypoint-Dunstown 400kV line (c. 1.4km)
- Unit 3: A new connection to the Coolnaback substation from the existing Athy-Portlaoise 110kV line
- Unit 4: A new 110kV/38kV/MV substation in Moatpark, Ballyragget, Co. Kilkenny
- Unit 5: A new 110kV overhead line between Ballyragget and Coolnaback substations (c. 26km).
- Unit 6: An uprate of the existing Ballyragget-Kilkenny 110kV overhead line (c. 22km)
- Unit 7: A new bay in the existing Kilkenny 110kV substation
- Unit 8: Modifications to the existing Athy-Portlaoise 110kV line (c. 3.6km)

Regarding the above, we confirm that the alterations sought in this Section 146B request relate only to elements of Unit 1 of the approved SID (Case Ref. PL11.VA0015), i.e., the 400kV/110kV substation compound and associated electrical apparatus located in the townland of Coolnaback; moreover, they are entirely modest in scale and nature and do not extent outside the identified area of the Approved substation compound.

**Figure 1** contains an extract of the approved layout of the 400kV/110kV substation (Case Ref. PL11.VA0015) and illustrates the substation compound and main associated electrical infrastructure.



**Figure 1: Site Layout – Approved 400kV/110kV Substation (Unit 1 of Case Ref. PL11.VA0015)**

It is to be noted that three previous Section 146B requests for alterations have been made to ABP in connection with the approved SID (Case Ref. PL11.VA0015), as listed below. None of these requests related to amendments to Unit 1 of the approved SID.

1. Case Ref. VM10.312316<sup>1</sup> / Ref. ABP-312316-21, wherein ABP signed the decision on 28 February 2022 to 'Alter decision – Not a material Alteration (No EIS)'
2. Case Ref. VM10.305108<sup>2</sup> / Ref. ABP-305108-19, wherein ABP signed the decision on 06 November 2019 to 'Alter decision – Not a material Alteration (No EIS)'
3. Case Ref. VM11.VM0012<sup>3</sup> Wherein ABP signed the decision on 31 November 2017 to 'Alter decision – Not a material Alteration (No EIS)'

### Legislative Context

Section 146B of the Planning Act provides the procedure under which decisions of the Board in relation to SID, including development permitted under Section 175 of the Planning Act, as amended, may be *altered*.

<sup>1</sup> Available here: <https://www.pleanala.ie/en-ie/case/312316>

<sup>2</sup> Available here: <https://www.pleanala.ie/en-ie/case/305108>

<sup>3</sup> Available here: <https://www.pleanala.ie/en-ie/case/vm0012>

Section 146B (1) of the Planning Act states that subject to subsections (2) to (8) and section 146C, the Board may amend the terms of any approved Strategic Infrastructure Development at the request of any person carrying out the development.

Section 146B (3)(a) of the Planning Act states that *'if the Board decides that the making of the alteration would not constitute the making of a material alteration of the terms of the development concerned, it shall alter the planning permission, approval or other consent accordingly and notify the person who made the request under this section, and the planning authority or each planning authority for the area or areas concerned, of the alteration'*.

The following sections outline the alterations being sought in this Section 146B request. It is respectfully considered by the Requester that the scale and nature of these alterations are minor and would not result in a material change to the terms of the approved SID (ABP Ref. PL.11.VA0015), and thus, satisfies the legislative requirements set out in Section 146B (1) and (3)(a) of the Planning Act whereby ABP can decide to *'Alter decision – Not a material Alteration (No EIS)'*. Of course, however, this is a matter entirely for decision by the Board.

### Description of Alterations Sought

The alterations sought are as follows:

- The redline boundary in the area of the approved substation will remain unchanged from that occurring in the original SID application per PL11.VA0015.
- Excavation depths and structure heights, as approved, will remain unchanged.
- The alterations sought, modest in nature and scale, are essentially all within the approved substation compound boundary. The only exception is a slight realignment of the approved access track for a short distance outside the compound, which links the compound to the access road; however, the modified access track remains within the originally identified redline boundary. Further details are provided in the sections below.

For clarity and convenience, we have provided a summary below of the elements of the approved 400kV/110kV substation for which alterations are being sought under this request.

Additionally, we have outlined the rationale for these alterations, which we reiterate derive from the detailed design process undertaken by ESB Networks in its Statutory function as Transmission Asset Owner.

#### (i) Alteration No. 1 – Changes to 400kV Substation Building

Alteration No. 1 seeks to relocate the approved 400kV substation building within the substation compound approximately 2 metres north of its approved initial location. See the revised position illustrated in the appended **Drawing No. IE000752-RPS-00-XX-DR-T-DG0010** (Site Layout Plan - Section 146B Amendment).

Apart from relocating the approved 400kV substation building, no further alterations, such as height, size, etc., are being sought.

The relocation arises from reconfiguring the transformer bunds (as detailed in Alteration No. 3 below). The revised position of the substation building will ensure safe access between structures for maintenance and operation.

#### (ii) Alteration No. 2 – Changes to 400kV Gantry

Alteration No. 2 seeks to relocate the approved 400kV gantry slightly southwest of its approved initial location. This will also require a slight re-arrangement of the overhead line structures entering the substation connecting to the gantry. Please see the revised position illustrated in the appended **Drawing No. IE000752-RPS-00-XX-DR-T-DG0010** (Site Layout Plan - Section 146B Amendment).

Apart from relocating the approved gantry, no further alterations, such as height, size, etc., are being sought for it.

This alteration is due to the revised position of the substation building (as detailed in Alteration No. 1). The revised position of the gantry will ensure an appropriate and safe separation distance between it and the 400kV substation building and other electrical apparatus.

### **(iii) Alteration No. 3 – Changes to Transformer and Reactor Bunds**

The approved 400kV/110kV substation (Case Ref. PL11.VA0015) included a number of bunds, approximately 80.9m x 11.15m x 12m high, comprising 2 no. transformer bunds and 2 no. reactor bunds. Each bund was separate and sized to hold a minimum of 110% of the oil capacity of its respective plant item.

It is now sought to omit the 2 no. approved reactor bunds entirely, as the reactors are no longer required due to technical specifications that have altered since the approval of the SID a decade ago.

The remaining 2 no. transformer bunds will be slightly resized (26.15m x 25.93m x 12m high each), relocated, and arranged back-to-back. This alteration is necessary due to a change in the internal configuration of the transformers, which has shifted from GIS (gas-insulated switchgear) termination to AIS (air-insulated switchgear) termination.

Additionally, the transformers will now be positioned separately to comply with updated electrical standards regarding separation introduced since the original SID approval and will accommodate 200% of the transformer oil capacity.

Notwithstanding the above, it is to be noted that the revised 2 no. transformer bunds will remain largely in the same location as previously approved and within the boundaries of the approved substation compound. Please see the revised position illustrated in the appended **Drawing No. IE000752-RPS-00-XX-DR-T-DG0010** (Site Layout Plan - Section 146B Amendment).

### **(iv) Alteration No. 4 (a and b) – Changes to Internal Road Layout**

Alterations No. 1 and No. 2 (i.e., alterations to the positioning of the approved substation building and gantry) will require the approved road layout within the substation compound to be slightly reconfigured. This is part of Alteration No. 4a.

In addition to minor reconfigurations to the road layout within the approved substation compound, Alteration No. 4b seeks a slight realignment of a section of the access track, approximately 10 metres long. This track links the substation compound to the main access road. Although this adjustment is outside the substation compound, it remains within the redline boundary of the approved development.

### **(v) Alteration No. 5 – Changes to Drainage**

A slight reconfiguration of the approved surface water collection network is being sought in response to the alterations sought to the internal road layout (see details above) within the substation compound. It should be noted that the overall design philosophy of the drainage system at the substation is not altered by these proposed minor amendments to the substation layout.

## **Environmental Considerations**

Regarding potential additional environmental effects from the alterations being sought in this Section 146B request, it is considered that there is no significant potential for additional impact due to the minor size and scale of the alterations. No new ground will be disturbed since the alterations are confined within the substation's approved footprint. Therefore, no additional adverse effects on the surrounding environment are anticipated beyond that previously assessed (including EIA and AA) by the Board.

**Our ref: IE000752 (Section 146B Request)**

C1 – Public

In light of the above, it is submitted that the *Environmental Impact Assessment Report (EIAR)* and *Natura Impact Statement (NIS)* undertaken for the approved SID remain valid for this Section 146B request, and accordingly, no supplemental EIAR, Environmental Statement or NIS is required, nor has been submitted.

The committed mitigation and monitoring measures from the approved SID will continue to be applied during the construction of the alterations being sought as appropriate and relevant, as they are, and have been, with all other elements of the approved development currently under construction.

### **Conclusion**

This letter and the enclosed drawings demonstrate that the alterations sought, the subject of this Section 146B request, consist of minor and modest modifications in nature and scale to the previously approved 400kV/110kV substation compound and associated electrical apparatus, part of Unit 1 of the approved SID (Case Ref. PL11.VA0015).

When considered in relation to the overall approved SID, the minor alterations are, therefore, considered by EirGrid to be non-material with no additional environmental impacts. Again, however, conclusion in this matter is exclusively to be decided by the Board.

Regarding the above, the alterations being sought herewith satisfy the legislative requirements set out in Section 146B (1) and (3)(a) of the Planning Act, and thus, we kindly ask the Board to approve the said alterations.

We look forward to a decision in due course. In this regard, the Board will note that the subject development is a live construction project of Strategic Infrastructure Development. EirGrid respectfully notes that the subject development will soon comprise a critical path element of the substation construction programme, and so requests a decision at the Board's earliest possible convenience.

Yours sincerely,  
for RPS Group Limited



**Carlos LaraGonzalez**

Senior Planner

carlos.laragonzalez@rps.tetrattech.com

+353 1 488 2900

### **Enclosures:**

1. Drawing No. IE000752-RPS-00-XX-DR-T-DG0010, Rev. P01, Entitled: Site Layout Plan - Section 146B Amendment, Created on 20/08/2024 at a Scale of 1:500 @ A0
2. Drawing No. IE000752-RPS-00-XX-DR-T-DG0011, Ref. P01, Entitled: Site Layout Plan - Consented Versus Sought Amendments, Created on 20/08/2024 at a Scale of 1:500 @ A0