



An
Bord
Pleanála

Record of Meeting ABP-307080-20/ABP- 307081-20 1st Meeting

Case Reference/ Description	ABP-307080-20 and ABP-307081-20: Electrical development associated with proposed Flexible Thermal Generation Facilities (FlexGen) and Battery Energy Storage Systems (BESS).		
Case Type	Pre-application Consultation		
Meeting	1 st Meeting		
Date:	13 th July, 2020		
Chairperson	Rachel Kenny		
Date	13 th July, 2020	Time	11.00am – 11.30am

Representing An Bord Pleanála

Rachel Kenny, Director of Planning (Chair)

Niall Haverty, Senior Planning Inspector

Nichola Meehan, Executive Officer

Representing Prospective Applicant

Liam Morrissey – Project Director

Andrew Morrow – Planner

Brendan Allen – Planner

Peter King – Project Manager

Gerard O'Leary – BESS Project Manager

Introduction:

Following introductions, the representatives of the Board referred to the request received from the prospective applicant to enter into pre-application consultations.

The Board advised the prospective applicant that the instant meeting essentially constituted an information-gathering exercise for the Board to determine whether the proposed development was strategic infrastructure development or not and if so, what the key considerations may be. It also invited the prospective applicant to outline the nature of the proposed development and to highlight any matters it wished to receive advice on from the Board.

The Board mentioned general procedures in relation to the pre-application consultation process as follows:

- The Board will keep a record of this meeting and any other meetings, if held. Such records will form part of the file which will be made available publicly at the conclusion of the process. The record of the meeting will not be amended by the Board once finalised, but the prospective applicant may submit comments on the record in writing which will form part of the case file.
- The Board will serve formal notice at the conclusion of the process as to whether or not the proposed development is SID. It may form a preliminary view at an early stage in the process as to whether the proposed development would likely constitute strategic infrastructure.
- A further meeting or meetings may be held in respect of the proposed development.
- Further information may be requested by the Board and public consultations may also be directed by the Board.
- The Board may hold consultations in respect of the proposed development with other bodies.
- The holding of consultations does not prejudice the Board in any way and cannot be relied upon in the formal planning process or any legal proceedings.

Presentation by the prospective applicant:

The prospective applicant is the ESB and the proposals relate to electrical development associated with 2 No. proposed Flexible Thermal Generation Facilities (FlexGen) and Battery Energy Storage Systems (BESS) on lands at the Poolbeg Generating Station and adjacent to the Dublin Bay Power Station, both in Dublin 4.

The prospective applicant gave an overview of the two projects and why it considers the proposed development not to be strategic infrastructure development under the following headings:

- **Planning and Development Act 2000 (as amended)** – Reason for seeking strategic infrastructure development screening determinations: **182A.**— (1) Where a person (hereafter referred to in this section as the ‘undertaker’) intends to carry out development comprising or for the purposes of electricity transmission, (hereafter referred to in this section and section 182B as ‘proposed development’), the undertaker shall prepare, or cause to be prepared, an application for approval of the development under section 182B and shall apply to the Board for such approval accordingly.

(9) In this section ‘transmission’, in relation to electricity, shall be construed in accordance with section 2(1) of the Electricity Regulation Act 1999 but, for the purposes of this section, the foregoing expression, in relation to electricity, shall also be construed as meaning the transport of electricity by means of—

- (a) a high voltage line where the voltage would be 110 kilovolts or more, or
- (b) an interconnector, whether ownership of the interconnector will be vested in the undertaker or not.]

Electricity Regulation Act definition of transmission:

“transmission”, in relation to electricity, means the transport of electricity by means of a transmission system, that is to say, a system which consists, wholly or mainly, of high voltage lines and electric plant and which is used for conveying electricity from a generating station to a substation, from one generating station to another, from one substation to another or to or from any interconnector or to final customers but shall not include any such lines which the Board may, from time to time, with the approval of the Commission, specify as being part of the distribution system but shall include any interconnector owned by the Board.

- **Site Locations:** The proposed developments are located within the existing Poolbeg Generating Station and to the south of the existing Dublin Bay Power Station on the Poolbeg Peninsula.
- **Plant Types:** It is proposed to construct a gas-powered Flexible Thermal Generation (FlexGen) Plant and a Battery Energy Storage System (BESS) at each site. Both FlexGen plants will have an electrical generation capacity of 75MW, while the BESS plants will be 75MW at the Poolbeg site and 30MW at the Ringsend site, respectively. The FlexGen and BESS plants do not form part of the SID pre-application consultation.

- **Technology:**

- **Aero derivative Gas Turbine (Poolbeg/Ringsend)**
 - Traditionally found on Aeroplanes
 - Primarily fuelled with natural gas with diesel available as back-up as required by the CRU
 - Fast start-up (Full load in less than 5min) - Due to the absence of steam cycle which differs from traditional power stations.
 - Offers flexibility to the grid, facilitating increased amounts of renewable non-synchronous generation on the system.
 - Likely to operate during periods when generation from renewables is low - morning & evening peak. Can provide energy when wind is low or when there is a high demand.
 - Expect to have low run hours (hundreds of hours per year)
 - **Battery Energy Storage System (Poolbeg/Ringsend)**
 - Facilitates increased level of renewable electrical generation on the Irish grid
 - Back-up electrical supply option during the hours of the day when electrical demand is at its highest
 - Will be increasingly required in order to facilitate Ireland meeting its renewable energy targets, by moving away from traditional power generation and supply to renewable solutions such as BESS.
- **Ringsend Grid Connection (ABP-307080-20):** This will comprise a transformer compound, three modular structures and electrical cable to the existing Irishtown 220kV substation at the north-east corner of the site.
 - **Poolbeg Grid Connection (ABP-307081-20):** This will comprise a transformer compound, three modular structures and electrical cable from the FlexGen site to the existing Poolbeg 220kV substation.
 - **Transformer Compound:** Dimensions – 60m length x 22m width x 5.6m high.
 - **Modular Structures:** Dimensions – 17.8m length x 5.7 width x 4.7m high
 - **Considerations:** ESB is seeking confirmation from An Bord Pleanála as to whether the proposed developments constitute Strategic Infrastructure Development (SID) pursuant to Section 182A of the Planning and Development Act, 2000
 - The 220kV electrical equipment and underground cable only facilitate connection of proposed developments to national electricity grid. These are

generator connections to the transmission grid but do not form part of the grid as controlled by EirGrid.

- Electrical plant does not constitute transmission infrastructure as it does not function as part of national electricity grid as controlled by EirGrid.
- The 220kV grid connection plant/equipment in itself would not:
 - be of strategic economic or social importance to the State or the region
 - contribute substantially to the fulfilment of any objectives of the National Planning Framework or the Regional Spatial and Economic Strategy and
 - have an effect on any area outside of the Dublin City Council administrative area
- For those reasons ESB submit that the relevant grid connection plant/equipment should not be considered Strategic Infrastructure Development.

- **Examples of ancillary grid connections where ABP deemed the works not to be SID:**
 - ABP 304794-19 - 110kV substation and underground electricity cable connecting the consented Coole Wind Farm to the national grid at Mullingar substation.
 - ABP 301420 -18 - 110kV tail fed substation and cable at townlands of Loughteegog, Bigbog, Money Lower, Coolnabacky and Esker, County Laois.
 - VC0104 - 110kv electricity substation and associated underground cable connection at Carrigandgan, Co. Cork.
 - VC0100 - 110Kv Substation Development and underground cable connection, Letter, Co. Galway.
 - VC0097 - Substation and associated Underground Cable Connection from permitted Drumnahough and Lenalea Wind Farms to Clogher Substation, County Donegal.
 - 301236 - Provision of a battery energy storage system. Lands North of the South Bank Road, Poolbeg, Dublin 2.

Discussion:

The following matters were discussed:

- The prospective applicant informed the Board's representatives that they have yet to submit the planning applications to Dublin City Council for the FlexGen and BESS developments.

- The Board's representatives queried the prospective applicant's statement that the proposed development did not constitute 'transmission', with reference to the definition in the Electricity Regulation Act, which refers to "high voltage lines and electric plant used for conveying electricity from a generating station to a substation". The prospective applicant responded that the transmission grid began at the existing 220kV substation, with reference to EirGrid's transmission map.

- The Board's representatives queried the proposed layout, which does not show a cable connection from the BESS to the substation. The prospective applicant advised that cabling to/from the BESS would operate at 38kV, so it does not form part of this SID pre-application consultation.

- The Board's representatives queried if additional equipment or alterations to the existing substations would be required. The prospective applicant confirmed that this would not be required.

- The Board's representatives advised the prospective applicant that, given the scale of the proposed development and similar cases determined by the Board not to be strategic infrastructure development, it is the Board's preliminary view that the proposed developments are not considered to be strategic infrastructure developments.

- The Board's representatives stated that in the event the Board decides the proposed development is strategic infrastructure, key planning and environmental issues to consider would be:
 - SEVESO implications, given the number of SEVESO sites in the area,
 - Appropriate Assessment and biodiversity impacts, given the proximity to Dublin Bay SPA and SAC sites,
 - flood risk to the development due to low-lying nature of the land, and potential for increased flood risk to adjacent lands, and,
 - visual impact.

They also stated that cumulative implications and combined effects should be considered. The prospective applicant informed the Board that an EIAR is currently being prepared in relation to the planning applications and all the issues raised will be dealt with in the EIAR.

- The prospective applicant enquired to the timescale to receiving a decision from the Board. The Board's representatives informed the prospective applicant that it would possibly be a matter of weeks.

Conclusion:

The record of the meeting will issue to the prospective applicant and it will be a matter for the prospective applicant to submit any comments on this if it wishes to do so. Following this, the prospective applicant should seek a second meeting with the Board or request closure to the pre-application process in writing. If closure to the pre-application is requested, the reporting inspector will complete the report and recommendation which will be forwarded to the Board for determination. A copy of the procedures will be attached, and the decision will then issue to the prospective applicant.

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Rachel Kenny

Assistant Director of Planning