



An  
Bord  
Pleanála

## Record of 1<sup>st</sup> Meeting ABP-314739-22

<b>Case Reference / Description</b>	ABP-314739-22 – Proposed development of a new 110kV substation in Belinstown, Swords, Co. Dublin.		
<b>Case Type</b>	Pre-application consultation		
<b>1<sup>st</sup> / 2<sup>nd</sup> / 3<sup>rd</sup> / 4<sup>th</sup> Meeting</b>	1 <sup>st</sup>		
<b>Date</b>	17/11/22	<b>Start Time</b>	11:00 a.m.
<b>Location</b>	Virtually	<b>End Time</b>	11:40 p.m.

<b>Representing An Bord Pleanála</b>		
<b>Staff Members</b>		
Ciara Kellett, Assistant Director of Planning (Chair)		
Jimmy Green, Senior Planning Inspector		
Eimear Reilly, Executive Officer	e.reilly@pleanala.ie	01-8737184
<b>Representing the Prospective Applicant</b>		
Robert O'Toole (ESB Networks)		
Andrew Morrow (ESB Networks)		
Daniel Nolan (ESB Networks)		

## Introduction

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The Board referred to the letter received from the prospective applicant on the 26<sup>th</sup> September 2022, requesting pre-application consultations under section 182A of the Planning and Development Act, 2000, as amended (“the Act”) and advised the prospective applicant that the instant meeting essentially constituted an information-gathering exercise for the Board; it also invited the prospective applicant to outline the nature of the proposed development and to highlight any matters that it wished to receive advice on from the Board. The Board mentioned the following general procedures in relation to the pre-application consultation process:

- 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 which will form part of the case file.
- The Board will serve notice at the conclusion of the process as to the strategic infrastructure status of the proposed development. It may form a preliminary view at an early stage in the process on the matter.
- 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 in any legal proceedings.

### **Presentation made by the prospective applicant:**

The prospective applicant, ESB Networks, provided an overview on the nature and extent of the proposed development which was stated to be for a 110kV substation located just off Batter Lane in the townland of Belinstown, Swords, County Dublin.

The prospective applicant noted that it seeks a determination from the Board as to whether the proposed development constitutes a strategic infrastructure development pursuant to Section 182A of the Planning and Development Act, 2000. It also drew attention to Section 182(9) with regard to the 'transmission' element of the proposed development, and to the definition of 'transmission' as set out in the Electricity Regulation Act, 1999.

The subject site is located west of the M1 with proposed access from Batter Lane on the public road network. In relation to the dimensions of the proposed development, the prospective applicant gave an example of a typical GIS, steel-framed building with a height of approximately 15m, and a mast structure with a height of approximately 26m. Contained within a 100m by 100m fenced compound, the proposed development includes a GIS building in the western portion of the proposed site along with a transformer compound with two transformers, and two end masts in the eastern portion of the site. The prospective applicant stated that there are two existing 110kV overhead lines at the site: the Finglas - Stephenstown 110kV line, and the Glasmore – Stephenstown 110kV line, both of which travel along the same overhead masts at this location. The Loughshinny 38kV line is also located just to the west and slightly overlapping with the north-western corner of the proposed site. The applicant also noted that the two end-masts within the proposed development will facilitate the transition of the overhead lines to underground cables for the connection to the proposed GIS building. This arrangement will result in the removal of the existing 110kV double circuit mast that is currently located on the eastern portion of the site.

The prospective applicant gave an overview of the rationale behind the proposed development. It explained that it proposes this development in its capacity as the Distribution System Operator (DSO) [as opposed to the role that EirGrid performs in its capacity as the Transmission System Operator (TSO)]. It stated that the purpose of this DSO project is to take electricity from the existing high voltage (HV) 110kV electricity line into a new substation in order to ensure that capacities in other substations in the area can be freed up for distribution purposes to the surrounding area. It stated that the development would accommodate future load growth in growing population centres between Swords, Donabate and Portrane which has occurred due to the addition of new MV customers and major housing developments in Swords and Donabate. It also stated that the existing Glasmore 38kV substation currently exceeds planning standard and is classed as "Fully-Utilised, Mitigation Required". The prospective applicant stated that the proposed development would increase the capacity in the Swords, Donabate and Portrane areas while reducing the demand on the Glasmore and Swords 38 kV substation and increase the security and reliability of supply in the area.

Finally, the prospective applicant stated its opinion that the proposed development would not comprise strategic infrastructure development given its nature and function, the modest scale, and the fact that the proposed development is required to facilitate upgrades of the distribution system.

**Discussion:**

The Board's representatives advised that the determination as to whether the proposed development would constitute development under Section 182A of the Act is ultimately for the Board, however, they also advised that further information would be required before any preliminary view could be offered. The information provided to date indicates that while the proposed works are being carried out to facilitate distribution capacity improvements in the system, they are being carried out to the transmission network having particular regard to the stated definitions in Section

182A of the Act. The Board's representatives sought clarification from the applicant as to whether the proposed development in fact constituted physical works to the distribution or transmission networks.

In response to this, the prospective applicant noted that parts of the 110kV network is classified as distribution within Dublin and its immediate surrounds due to the nature and scale of the loadings involved. The prospective applicant noted that it would review the matter and provide further clarification following receipt of the record of the instant meeting and on further consideration of both the Board's position in terms of the stated definitions within the Act, and the nature of the prospective applicant's classification of the subject works and network.

The Board's representatives acknowledged the prospective applicant's position and advised that should the prospective applicant wish to submit additional documentation as part of any future close-out submission it could be considered further. Alternatively, should a further meeting be required to provide further discussion in relation to this issue it would be facilitated. The prospective applicant was advised that ultimately the final determination on this matter would lie with the Board.

The Board's representatives noted that the subject site is on land zoned as "Green Belt" and advised the prospective applicant to provide adequate justification for the proposed development in terms of site selection and design at application stage with regard to the Fingal County Council Development plan. In relation to this, the Board's representatives also advised that landscaping around the proposed development should be considered in order to aid its assimilation into the landscape at this location.

In response to a question regarding access to the site, the prospective applicant confirmed that the access will be connected directly to the public road (Batter Lane). It also noted that, during initial discussions, Fingal County Council had advised the

prospective applicant to seek their own entrance and that discussions will continue on this matter.

The Board's representatives advised that the prospective applicant ensure that prior to (or as part of) the closeout of the pre-application discussions that the red line boundary contains/includes all necessary works required to facilitate the proposed development (e.g. landscaping, drainage, provision and maintenance of sightlines, access to public road etc.).

In response to a question regarding assessments, the prospective applicant confirmed that an ecologist has considered the site and their preliminary advice is that the proposed development could be screened out for appropriate assessment. The prospective applicant also noted that it had a preliminary meeting with Fingal County Council approximately a year ago and the existence of a small housing development to the north-west of the site was referenced. The prospective applicant has stated that any future application will be accompanied by a noise assessment, as well as an archaeological impact assessment, the appropriate ecological reporting and a landscape and visual assessment.

**Conclusion:**

The Board's representatives advised that the record of the instant meeting will issue shortly, and that the onus is on the prospective applicant to submit comments, request closure of the pre-application process or to request a further meeting.

 24/11/22

**Ciara Kellett**

**Assistant Director of Planning**