



An
Bord
Pleanála

Inspector's Report ABP 301511-18

Development	Proposed Substation
Location	Clyde House, Blanchardstown Business and Technology Park, Blanchardstown, Dublin 15.
Prospective Applicant	Equinix Ireland Ltd.
Planning Authority	Fingal County Council
Type of Application	Pre-Application consultation under section 182E of the Planning and Development Act 2000, as amended.
Date of Site Inspection	27/01/20
Inspector	Pauline Fitzpatrick

1.0 Pre – Application Consultation

The Board received a request on the 27th April, 2018 from Brock McClure Planning and Development Consultants on behalf of Equinix Ireland Ltd. to enter into pre-application consultations under Section 182E of the Planning and Development Act 2000, as amended, in relation to a proposed substation and associated works at Clyde House, Blanchardstown Business and Technology Park, Blanchardstown, Dublin 15.

The prospective applicant was requested was way of correspondence dated 10th August, 2018 to clarify whether the proposed development would form part of the national transmission network. A response was received on the 4th September, 2018. Further clarification was requested by email dated 18th October, 2018 to which a response was received by email dated 4th February 2019.

The Board’s representatives met with the prospective applicant and its agent on the 6th March, 2019 and 4th February 2020. The prospective applicant formally requested closure of the pre-application consultation process in correspondence received 24th February, 2020.

2.0 Site Location

The site is located within the north-western portion of the Blanchardstown Business and Technology Park accessed via a barrier controlled entrance from the Snugborough Road (R843). The original building on the site has been demolished save for the remnants of the front vestibule with the site cleared. Hoarding and gates preclude access. The site is bounded by an office building to the north known as Clyde House 2 with a confectionary factory to the south-east. Blanchardstown Road North (R121) forms the western boundary. A 110kV power line traverses the site with a pylon thereon.

3.0 Proposed Development

The purpose of the proposed 110 kV substation is to be serve a permitted data centre comprising of 3 no. data halls originally granted permission under ref. FW18A/0032 and subsequently amended under ref. FW19A/0176. The

development, as amended, extends to 13,700 sq.m., with ancillary plant and 70 no. car parking spaces.

The substation compound is to be located in the south-eastern most corner of the site. It is to be known as Barnageeragh 110kV substation. It will contain 2 no. 110kV transformer bays.

Underground connections are proposed to both Cloghran and Snugborough substations to the south and south-east of the site respectively. The two connections to the grid are predicated on capacity requirements and the need to ensure a security of supply.

The route of the connection to the Cloghran substation will be approx. 0.85 km in length, largely located within the existing business park.

Two route options are being considered for the connection to the Snugborough substation. The 1st is approx. 1.75 km in length largely through IDA lands. The 2nd is approx. 1.5 km in length largely located within the existing business park.

Each cable connection route will be accompanied by the relevant landowner(s) consent.

As per correspondence from Eirgrid received by the prospective applicant and forwarded to the Board, it is the intention that the substation would form part of the transmission system.

No overhead lines are proposed as part of the project.

4.0 Planning History

FW18A/0032 – permission granted for 19,687 sq.m. 3 no. single level data hall buildings.

FW19A/0176 – permission granted for amendments to above grant of permission resulting in a reduction in the floor area of the buildings to 13,700 sq.m.

5.0 Applicant's Case

The prospective applicant notes that the substation and underground cables will form part of the transmission network. No overhead lines are proposed as part of the project.

6.0 Legislative Provisions

Under section 182A (1) of the 2000 Act (inserted by section 4 of the 2006 Act) where a person, (hereafter referred to 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 development under section 182B and shall apply to the Board for such approval accordingly.

Subsection 9 states that 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.

In section 2(1) of the Electricity Regulation Act, 1999, "transmission" is defined as 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.

"Distribution" is defined as

“The transport of electricity by means of a distribution system, that is to say, a system which consists of electric lines, electric plant, transformers and switch gear and which is used for conveying electricity to final customers.”

“Electric plant” is defined as:

any plant, apparatus or appliance used for, or for the purposes connected with, the generation, transmission, distribution or supply of electricity other than –

(a) An electric line

7.0 Assessment

The current proposal entails a new 110kV substation and two cable connections to the Cloghran and Snugborough substations to the south and south-east of the site. The substation is to serve a permitted data centre on the site. I consider that the substation constitutes electric plant as defined above in that it is plant for the purposes connected with the generation of electricity.

Section 182A (9) of the Act sets a threshold of 110kV in order for a high voltage electricity transmission line to be considered strategic infrastructure. No threshold is set in respect of a substation.

By reason of the loop in-loop out link to the existing circuit via the underground cables the power of the overall existing circuit will be entirely diverted into the substation and back out again. In effect, the substation will form a new node along that existing circuit. Therefore, the new substation and associated underground cables will form part of the existing transmission network. Eirgrid’s correspondence on file is clear in this regard.

I conclude that the substation, in forming such a node on the 110kV transmission network, constitutes Strategic Infrastructure.

The Board will note previous decisions it has made on strategic infrastructure pre-application consultation requests in relation to electricity transmission infrastructure under Section 182E. In cases VC0098 at Mountphillips, Co. Tipperary, VC0111 at Rosspile Co. Wexford, 300167 at Vasingstown and Harlockstown Dunboyne, Co. Meath, 301601 at Gillinstown, Duleek, Co. Meath and 301646 at Harristown, Castlejordan and Clongall Co. Meath the Board determined that the provision of a

new 110kV substation which is to be looped into the existing transmission network constitutes Strategic Infrastructure

I consider that the subject case is comparable.

For the Board's information and as referenced in the prospective applicant's correspondence I note that it decided that a 220kV substation and underground double circuit transmission line on lands off Cruiserath Road and cablebays in the 110kV/220kV Corduff substation to serve the Amazon Data Centre was Strategic Infrastructure (file ref. ABP 301430-18).

My inspection of the site and vicinity did not reveal any significant matters which might be relevant to the consideration of this application in the future by the Board.

8.0 Conclusion

I consider that the proposed development as described in the submissions and drawings constitutes strategic infrastructure coming within the scope of section 182A of the Planning and Development Act 2000, as amended, necessitating an application direct to the Board.

9.0 Recommendation

I recommend that Equinix Ireland Ltd. be informed that the proposed development consisting of a 110kV substation and grid connection at Clyde House, Blanchardstown Business and Technology Park, Blanchardstown, Dublin 15 as set out in the plans and particulars received by An Bord Pleanala on 27th day of April, 2018 and 4th day of February, 2020 falls within the scope of section 182A of the Planning and Development Act 2000, as amended, and that a planning application should be made directly to the Board.

Pauline Fitzpatrick
Senior Planning Inspector

February, 2020

Appendix 1

The following is a schedule of prescribed bodies considered relevant in this instance for the purposes of Section 182A(4)(b) of the Act.

- Minister for Housing, Planning and Local Government
- Minister for Communications, Climate Action and Environment
- Department of Culture, Heritage and the Gaeltacht
- Fingal County Council
- Transport Infrastructure Ireland
- An Taisce
- Heritage Council
- Commission for Regulation of Utilities, Water and Energy
- Health Services Executive