



An
Bord
Pleanála

Inspector's Report ABP-308655-20.

Development	Grid connection between existing and proposed substations
Location	Grange Castle Business Park, Lucan, Dublin 22.
Prospective Applicant	Edgeconnex Ireland Ltd
Planning Authority	South Dublin County Council
Type of Application	Pre-Application consultation under Section 182E of the Planning and Development Act 2000, as amended.
Date of Site Inspection	4 January 2021
Inspector	Mairead Kenny

1.0 Overview

- 1.1. This report refers to a request to enter pre-application consultation which was received by the prospective applicant on 13th of November 2020. The proposed development relates to 2 no. grid connections from the permitted 110kV GIS substation which is under construction and new grid connection works to Grange Castle 110 kV substation.
- 1.2. One meeting was held remotely on 11 January 2021.
- 1.3. Documentation showing route options for the grid was received by the Board on 16 January 2021.
- 1.4. A letter requesting closure was received on 20 January 2021 .

2.0 Site Location and Description

- 2.1. The site is partly within Grange Castle Business Park and partly with the Edgeconnex compound at the northern of an overall data centre development.
- 2.2. The western side of the proposed development would be within the Edgeconnex compound. The final phase of the data centre and the associated substation are under construction. The site defined which includes the Edgeconnex substation site is positioned at the north-eastern end of the large land holding owned by the prospective applicant.
- 2.3. The central and eastern side of the proposed development would be within lands which are part of the business park and in the ownership of the local authority and at the extreme eastern side would include part of the Grange Castle substation. The central part of the site contains a Dublin Bus terminus and the Griffeen River, which is in culvert in places. The Griffeen runs parallel to the preferred route option for much of its length.

3.0 Proposed Development

- 3.1. The scope of the proposed development is to provide a connection between the permitted 110kV kV GIS substation at the Edgeconnex site where construction has

commenced (18A/0298) and the Grange Castle substation, which is long established.

- 3.2. It was confirmed at the pre-application meeting that this is the scope of the development subject of the further information request and the applicant was advised to carefully address the description of the proposed development and to consider the extent of the site boundary and whether or it should include the Edgeconnex substation under construction and any part of the existing Grange castle substation.
- 3.3. In terms of the detail of the preferred route and the options considered, drawing 1011 refers. Options for the grid connection route all pass close to the nearby Dublin Bus terminus and involve crossing of the culverted Griffeen river and are typically located within lands which are in the ownership of the local authority or are part of the industrial estate. The applicant indicated that there are a lot of services in the area and that this was one of the reasons for the possible crossing under river using directional drilling.
- 3.4. The main stakeholders for the development are Eirgrid, ESB Networks and Edgeconnex Ireland Ltd the developer.
- 3.5. The development of the 2 no. underground single circuit transmission lines will be a contestable development.
- 3.6. On completion of works the 110kV substation under construction and the 2 no. underground single circuit 110kV transmission lines will be handed over to EirGrid whom in conjunction with ESBN will carry out the final commissioning and energisation of the permitted 110kV GIS substation and 110kV transmission lines. Then the permitted 110kV GIS substation within the Edgeconnex site and the 2 no. underground single circuit transmission lines will form part of the ESBN infrastructure which EirGrid will be responsible for operating.
- 3.7. A letter of consent from the local authority whose lands are traversed is enclosed.

4.0 **Planning History**

- 4.1. Reg. ref. 18A/0298 – permission was granted for the final phase of the Edgeconnex site to the east of the R120 for:

- **Amendment and completion** of the permissions granted under Reg. Ref. SD16A/0214, SD16A/0345, SD17A/0141 and SD17A/0392, construction of two new single storey data halls and associated office areas and plant and other development
- To include the **relocation and redesign of the two storey ESB substation (556sq.m) with associated transformer yard and single storey transformer building (180sq.m)** permitted under SD16A/0345 to the immediate north of the entrance into the site from Grange Castle Business Park.

5.0 Precedent Cases

- 5.1. A similar case was considered by the Board under ABP-300793-18. The development concerned was a proposed underground double circuit 110kV transmission line between the existing Belcamp 220kV and 110kV substation, in Fingal County Council, to the permitted Darndale 110kV substation In Dublin City Council.
- 5.2. The Board determined that the grid connection would be strategic infrastructure and had regard to the fact that the proposed development would form part of the national transmission network.
- 5.3. The Board was also of the view that the proposed development would be of strategic economic or social importance to the State or the region in which it would be situate, and was not satisfied that the proposed development would not have a significant (positive) effect on the area of more than one planning authority

6.0 Prospective Applicant's Case

- 6.1. It is submitted that the proposed development meets the relevant criteria under section 182A and 182B and constitutes strategic infrastructure development having regard to the following:
- the proposed development includes provision of an already permitted 110 KV GIS substation and 2 no. underground single circuit 110 KV transmission lines and

- the asset owner of the proposed development will be ESNB.

6.2. It is apparent therefore that the proposal will form part of the transmission network upon completion and therefore constitutes strategic infrastructure development under section 182A.

7.0 Legislative Provisions

7.1. 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.

7.2. 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.

7.3. 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.”

7.4. “**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.....”

8.0 **Assessment**

I consider that the development of the grid connection between the permitted Edgeconnex substation, which is under construction and the Grange Castle substation and the related infrastructure is ‘electrical plant’ as defined by the Electricity Regulation Act 1990.

I consider that in the determination with respect to whether this proposed project would be a strategic infrastructure project the following are evident and noteworthy:

- The cable will form part of the transmission network on completion providing a connection between two 110kV substations.
- It will be transferred to ESN on completion.
- It is comparable to the case previously considered by the Board under ABP-300793-18 which was determined to be strategic infrastructure under section 182A. While that development straddled two administrative boundaries and the Board considered the criteria under section 37(A)(2), my reading is that the heart of the matter related to the fact that the cable was determined to be transmission and thereby was strategic infrastructure under section 182A.

As such I consider that it can be concluded without further assessment that the subject development is strategic infrastructure.

I conclude that the proposed development as described in the submitted documentation constitutes strategic infrastructure within the scope of section 182A of

the Planning and Development Act 2000, as amended, necessitating an application direct to the Board.

I attach an Appendix listing relevant prescribed bodies.

9.0 Recommendation

I recommend that Edgeconnex Ireland Ltd be informed that the proposed development consisting of 2 no. grid connections from the permitted 110kV GIS substation and new grid connection works to connect to the Grange Castle 110kV substations at Grange Castle Business Park, Lucan, Dublin 22 as set out in the plans and particulars received by An Bord Pleanála on 13 November 2020 and 16 January 2021 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.

Mairead Kenny
Senior Planning Inspector
26/01/2021

Appendix – list of prescribed bodies

The following list identifies the prescribed bodies which are 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
- South Dublin County Council
- Transport Infrastructure Ireland
- An Taisce
- Heritage Council
- Inland Fisheries Ireland
- Córas Iompair Éireann
- Irish Water
- Commission for Regulation of Utilities