



An  
Bord  
Pleanála

## Inspector's Report

### ABP-313653-22

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<b>Development</b>	Proposed 220kV GIS substation, grid connection to the existing transmission network and associated works.
<b>Location</b>	Townlands of Belshamstown and Creemore, Co. Meath.
<b>Planning Authority</b>	Meath County Council
<b>Prospective Applicant</b>	GDA Energy 4 Ltd.
<b>Type of Application</b>	Pre-Application consultation under Section 182E of the Planning and Development Act 2000, as amended.
<b>Date of Site Inspection</b>	29 <sup>th</sup> June 2022
<b>Inspector</b>	Jimmy Green

## 1.0 Overview

- 1.1. On the 25<sup>th</sup> of May 2022 the Board received a request to enter into pre-application consultation under Section 182E of the Planning and Development Act, 2000 (as amended), (“the Act”) in relation to the proposed development of a 220kV Gas Insulated Switchgear (GIS) substation and associated underground 220kV cabling at Belshamstown Co. Meath. The proposed substation will facilitate the connection of a battery storage and synchronous condenser development (currently under the consideration of Meath County Council under PI. Ref. 22/837 and which is due for decision on the 26<sup>th</sup> of October 2022) to the national grid but has also been designed to accommodate additional future connections to the existing Woodland 400kV substation should they be required.
- 1.2. A virtual meeting was held with the prospective applicant on the 12<sup>th</sup> of July 2022. Closure of the pre-application consultation was requested in correspondence dated 28<sup>th</sup> September 2022 and received by the Board on the same date. A record of the meeting is attached to the file. The presentation made to the Board’s representatives at the meeting is also attached to the file.
- 1.3. The prospective applicant, GDA energy, is an Irish-based company investing in low carbon infrastructure projects. In the opening correspondence on file the prospective applicant for the purpose of the SID pre-application consultation request is given as:

- GDA Energy Ltd.,  
**Registered Office:** 4<sup>th</sup> Floor Hambleton House, 19-26 Pembroke Street Lower, Dublin 2.

The close-out letter that has been received has slightly altered the name of the prospective applicant to be as follows:

- GDA Energy 4 Ltd.,  
**Registered Office:** 4<sup>th</sup> Floor Hambleton House, 19-26 Pembroke Street Lower, Dublin 2.

Although a refinement of the prospective applicant’s name was not discussed during the pre-application meeting, given the slight change in name advised in the prospective applicants most recent correspondence I consider it appropriate that all correspondence on this application should be in the name of GDA Energy 4 Ltd.

1.4. This Report provides an overview of the proposed development, the legislative provisions, relevant precedents and recommends that the Board determine that the proposed development does fall within the scope of Section 182A of the Act. A recommended list of Prescribed Bodies that should be forwarded copies of the application is included in **Appendix A** should the Board concur with my recommendation .

## 2.0 **Site Location and Description**

- 2.1. The site of the proposed 220kV substation ('the site') is located on lands in the townlands of Creemore and Belshamstown, Co. Meath, approximately 4km southwest of Dunshaughlin and 2km northwest of Batterstown. The proposed substation is located within a flat agricultural field with mature hedgerows along the boundaries.
- 2.2. The site of the proposed 220kV substation is located to the north of the existing Woodland 400kV substation, which was originally included in its entirety within the redline site boundary. The initial site boundary did not incorporate any means of achieving vehicular access to the site of the proposed substation for either construction or operational purposes. During the virtual meeting clarification of the extent of the site boundaries and ownership was sought. The prospective applicant has addressed this issue by revising the red-line boundary to incorporate and include an access road (running through the townland of Belshamstown) from the R154 which lies approximately 900m to the northeast of the proposed substation location (which is in the townland of Creemore) and has removed the Woodland 400kV substation and any of its attendant lands from the redline boundary.
- 2.3. The site is relatively remote from residential development although there is a scattered rural settlement pattern following the local and regional road network in the wider area. The updated site boundaries that have been provided as part of the close out request now include an access road to the substation from the regional road to the northeast (R154). The access road seems consistent with that proposed as part of Pl. Ref. 22/837 (the neighbouring planning application for a battery storage development).

- 2.4. The site is drained by two rivers, the Tolka (as marked on maps but recorded as the Moyleggan at this location on the EPA Water Features mapping) which is traversed by the proposed access road, and the Woodland 09 watercourse which runs in an easterly direction and forms the southern boundary of the proposed development site, separating it from the existing 400kV Woodland substation.
- 2.5. The proposed development also includes an underground 220kV transmission line which will ultimately connect to the 400kV Woodland substation which lies a short distance to the south and outside the latest submitted site boundary.
- 2.6. There are two items on the Sites and Monuments Record (SMR) in the vicinity – a “Ringfort/Rath” (ME044-017) located approximately 100m to the northeast of the proposed substation and a “Moated site” (ME044-016) located approximately 110m to the southwest.

### **3.0 Proposed Development**

- 3.1. The details of the proposed development have been set out in the documentation provided by Clifton Scannell Emerson. The design of the proposed substation has altered since the pre-application consultations and the close out letter includes a revised layout. Accordingly, the proposed development constitutes the following:
  - A 220kV Gas Insulated Switchgear (GIS) Substation comprising a compound containing a two-storey GIS substation building with all associated control and high voltage equipment, six transformers with associated ancillary equipment and enclosures, as well as six client control modular buildings. An access road is proposed surrounding the substation compound which will have a galvanised steel palisade fence along its perimeter.
  - Associated elements of the substation include underground cables and ducts, lightning masts, car parking, equipment plinths, boundary security fence, compound lighting, palisade gates and fencing, security lighting, CCTV, internal access roads, hardstanding areas and all necessary foundation works.
  - The provision of two no. 220kV underground cables to the southern boundary of the landholding (adjacent to the Woodland Substation).

- The provision of an access road to the proposed substation from the R154.

3.2. Ultimately, if constructed, it is intended that the proposed substation will be transferred to the ownership of Eirgrid, who together with the ESB will carry out the final commissioning and energisation. The smaller client control modules/compounds will continue to be operated and maintained by the independent power producers who may use the facility to connect to the national grid in the future.

3.3. The site of the proposed development is on agricultural lands and is unzoned in the Meath County Development Plan 2021. Although this area is recognised as being under strong urban influence there are no other site-specific development objectives or designations associated with the site under the provisions of the County Development Plan.

## 4.0 **Planning History**

There are a variety of planning applications lodged in the wider area of the Proposed Development, however, the most pertinent planning histories in immediate vicinity of the site relate to the existing Woodlands 400kV Substation and the current proposal for a battery storage facility including a synchronous condenser.

### 4.1. **Proposed Battery Storage**

4.1.1. PI. Ref. 22/837 is a current planning application by GDA Energy 4 Ltd. (same as the current prospective applicant) for the provision of new battery energy storage facility and synchronous condenser, on lands immediately adjacent to, and overlapping with, the site of the proposed substation development (for example both are proposed to share the same access road). The battery storage application constitutes the provision of rechargeable battery units with inverters contained within 253 no. 40 foot containers. A synchronous condenser within a c.983 sqm building (ranging in height from c. 11 to 13m), and all associated works, including an underground cable which, if constructed, will connect to the subject 220 kV GIS substation. This application was placed on further information by Meath County Council in relation to floodrisk management (the proposed access road in the vicinity of the Tolka/Moyleggan River runs through a floodzone A area), design of lightning masts, as well as lighting layout/design. The applicant has responded to the further

information request and a decision is due on this application by the 26<sup>th</sup> of October 2022.

#### 4.2. **400kV Woodland Substation.**

4.2.1. The site of the 400kV Woodland substation is located immediately to the south of the proposed development. There are a number of applications related to this substation, including the following:

- **93/791**, permission granted in October 1993 to the ESB to erect a telecommunications mast at the existing high voltage transmission station.
- **99/1106**, permission granted in July 1999 to the ESB for a palisade fencing around the perimeter of the existing electrical compound.
- **DA60134**, permission granted August 2006 to the ESB for alterations to the existing 400kV electrical transformer station, consisting of a new transformer, radiator bank, surge arrestors, and oil interceptor.
- **DA60583**, permission granted in February 2007 to ESB Telecoms for the development of a 42m high free-standing communications structure.
- **DA110127**, permission granted to Eirgrid Plc. in April 2011 for alterations to the existing 400kV electrical transformer station including a new 400kV/220kV transformer and all associated works.

4.3. Just south of Woodland 400kV substation is the Interconnector Converter Station (granted permission by the Board in September 2009 under **PL17.VA.0002**), the purpose of which is to import/export energy to/from the UK. This site has also been subject to a more recent planning application (Pl. Ref. DA130761), under which permission was granted to Eirgrid Interconnector Ltd. in December 2013 for the erection of 2 no. acoustic barriers and all associated site development works.

## 5.0 **Precedent Cases**

5.1. In terms of similar, recent precedent cases I refer to the Board to the following:

- ABP-310033-21 - 220kV substation and grid connection, Dunnstown, Co. Kildare, considered to be Strategic Infrastructure Development - SID (2022) –

case similar to the current situation in that a concurrent battery storage project was to be connected to an extant 400kV substation.

- ABP 311020-21 - 220kV substation and associated grid connection to Maynooth-Gorman 220KV line, County Meath, considered to be SID (2022)
- ABP – 311276-21 – 220kV substation with loop-in loop-out connection to national grid, Co. Westmeath, considered to be SID (2021).
- ABP-303412- 220kV electricity substation, 2 no. 220kV circuits to the existing Maynooth-Woodland 220kV Overhead line, considered to be SID (2019)

## 6.0 Prospective Applicant's Case

The applicant considers that the subject development would constitute Strategic Infrastructure for the purposes of electricity transmission, pursuant to Section 182A of the Act. The main points raised in this regard in their submission being as follows:

- The proposed development constitutes electrical infrastructure which is in excess of 110kV.
- The proposed development is considered 'transmission' under the definitions set out in the Electricity Regulation Act 1999.

## 7.0 Relevant Legislation

**Section 182A (1) of the Act** provides that *“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.”*

**Section 182A(9) of the Act** defines ‘transmission’ in relation to electricity, as being *“...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.”*

**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” in relation to electricity 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,*

*(b) a meter used for ascertaining the quantity of electricity supplied to any premises, or*

*(c) an electrical appliance under the control of a consumer.”*

## **8.0 Assessment**

8.1. The proposed development comprises a 220 kV substation and associated underground electrical 220kV cabling towards and from the Woodland 400kV substation, as well as all associated works, including the provision of an access road



from the R154 (which will also facilitate access for the concurrent application for the battery storage application currently before Meath County Council).

- 8.2. I consider that the proposed 220kV substation can be accurately described as 'electric plant' as defined in relevant legislation. The proposed development includes high voltage cables of 220kV, the ownership of which will be transferred to ESB Networks which EirGrid will be responsible for operating on completion.
- 8.3. I consider that the proposal meets the definition of electricity transmission under section 2(1) of the Electricity Regulation Act 1999 and Section 182A(9) of the Act as set out above . As such, it would fall under Section 182A of the Act and would be deemed to be strategic infrastructure development.
- 8.4. I note a change in the extent of the red-line boundary between the request for pre-application consultation originally and the request to close the consultations. These changes were not discussed at the virtual meeting and I therefore reference some considerations arising below as a means of advising any future substantive S182A application.
- The proposed access road which has been set out within the application traverses the Tolka/Moyleggan River, and its floodplain. Part of the access road works will be within floodzone 'A' and accordingly appropriate floodrisk reporting will be necessary, regardless of the outcome of the current battery storage application (which includes provision for the same road).
  - I also note that there has been a minor change to the prospective applicant's name from GDA Energy Ltd to GDA Energy 4 Ltd. The latter being consistent with the applicant's name for the concurrent battery storage application before Meath County Council. I consider it appropriate that the prospective applicant in this case be GDA Energy 4 Ltd. as set out in their latest correspondence, and it will be necessary for any future landowner consents to refer to the correct entity.
- 8.5. In relation to Appropriate Assessment, in discussions, the prospective applicant noted their intent to submit an Appropriate Assessment Screening Report. This will be an issue for the prospective applicant to consider in the event of linkages to the Natura 2000 network and/or the specified need for specific mitigation measures to avoid impacts. Generally, in this regard I note that the site of the proposed

development does not overlap with (nor is it proximate to) any Natura 2000 sites. The Tolka River system does drain this location and it ultimately runs to South Dublin Bay and River Tolka SPA approximately 30km to the southeast. There are other closer Natura sites such as the Rye Water Valley/Carton SAC which is in excess of 9km south of the proposed development, as well as the River Boyne and River Blackwater SPA and SAC both of which are located in excess of 12 kilometres to the northwest of the proposed development.

- 8.6. During pre-planning discussion, the applicant stated that a range of studies are being undertaken, including biodiversity, cultural heritage, landscape, air and noise as well as soils and water. Having regard to the nature of the receiving environment and proposals currently in the planning system in the vicinity I consider it important that any future application is supported by such assessments and that these should consider potential cumulative impacts as appropriate. Furthermore, as noted it would also be important to consider flooding and floodrisk, given the alteration to the layout proposed in the close-out documentation and the need to provide works within floodzone A.
- 8.7. In relation to EIA the applicant indicated in discussions that an EIAR screening document would be provided, given the nature of the development and potential for cumulative impacts to arise I consider it appropriate for any future application to include such documentation.
- 8.8. As part of the substantive application process the prospective applicant is advised to ensure all relevant landowner consents are in place to facilitate the proposed development.
- 8.9. 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.
- 8.10. In view of the scale, nature and location of the proposed development, as described in this report, it is recommended that the prospective applicant should consult with the prescribed bodies listed in the attached Appendix in respect of any future application for approval.

## 9.0 Conclusion

- 9.1. I consider that the proposed development as described in the submissions and drawings, and as discussed at the pre-application consultation meeting constitutes strategic infrastructure coming within the scope of Section 182A of the Planning and Development Act, 2000 as amended, necessitating a direct application to the Board.

## 10.0 Recommendation

- 10.1. I recommend that the prospective applicant, GDA Energy 4 Ltd. c/o Clifton Scannell Emerson Associates, be notified that the proposed development consisting of a 220kV GIS substation on lands in the townlands of Creemore and Belshamstown Co. Meath including the provision of underground 220kV transmission cables towards the existing Woodland 400kV substation as described in the documents received by the Board on the 25<sup>th</sup> May 2022, and augmented by the updated layout received by the Board on the 28<sup>th</sup> September 2022, 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.

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Jimmy Green  
Senior Planning Inspector

17<sup>th</sup> October 2022

## **Appendix A – 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 of Housing, Local Government and Heritage,
- Minister of the Environment, Climate and Communications
- Meath County Council
- Transport Infrastructure Ireland
- Commission for Regulation of Utilities,
- Irish Water
- Inland Fisheries Ireland
- An Taisce
- Fáilte Ireland
- The Heritage Council