



An
Bord
Pleanála

Inspector's Report

ABP-314767-22

Development	Upgrading of the existing Poolbeg 200kV Electrical Substation.
Location	Pigeon House Road, Dublin 4
Planning Authority	Dublin City Council
Prospective Applicant(s)	Eirgrid plc.
Type of Application	SID Pre-Application Consultation under S.182E
Inspector	Conor McGrath

1.0 Introduction

The Board received a request on 04/10/2022 from EirGrid plc. to enter into a pre-application consultation under section 182E of the Planning and Development Act 2000, as amended, in relation to Upgrading of the existing Poolbeg 200kV Electrical Substation.

This report provides an overview of the proposed development, relevant precedents and legislative provisions and recommends that the proposed development does not constitute strategic infrastructure. A pre-application consultation meeting was not considered necessary in this instance.

2.0 Site Location and Description

The site is located off Pigeon House Road, within a larger ESB landholding of approx. 31ha in, on the Poolbeg peninsula. Surrounding lands are generally in use for energy and utility purposes and the site is located immediately south of the now, disused Poolbeg Electricity Station and its iconic chimneys. The site as outlined in red includes the existing 220kV Poolbeg substation, while the site of the proposed works occurs to the west of the existing substation in an area currently under grass, and dense vegetation/ trees in parts. Pigeon House Road bounds the site to the east and south.

The site is not located within any European Site, however, South Dublin Bay and River Tolka Estuary SPA (Site Code 004024) and the South Dublin Bay SAC (Site Code 000210) immediately adjoin the southern and eastern shoreline of the peninsula.

3.0 Proposed Development

The proposed development is described as comprising the following elements:

- A new 220kV GIS building (1600-sq.m. and 15m high)
- Replacement of 3 no. existing Statcom reactors on southern substation boundary and other outdoor reactors, including two to the north of the existing AIS.
- 4 no. lightning protection masts.

- Associated provision, removal or alteration of cables and ducting.
- Associated compound and hardstanding, etc.
- Ancillary works.

The proposal is described as a key project of the “Powering Up Dublin” programme of works. This programme is intended to replace existing transmission infrastructure which has reached end of life with higher capacity infrastructure. This will assist in accommodating new generation sources, including in particular off-shore generation in line with the Climate Action Plan.

The prospective applicants indicate a preliminary view that an application in respect of the proposed development may require the preparation of an NIS, but that it is not expected that EIA will be required.

4.0 Case made by Prospective Applicant

The prospective applicants describe the upgrade of the existing substation as essential, in order to:

- Ensure a reliable and secure transmission system for the greater Dublin area.
- Achieve the Government’s 80% renewable energy target, and
- Provide opportunities for market access for demand and generation customers.

The development is required to facilitate integration of generation, (including renewables) and increased demand, which require additional substation feeder and transformer bays. It is stated that an examination of available options concluded that the best option is the proposed extension to the Poolbeg 220kV busbar in an adjacent GIS building, using gas insulated busduct to connect the bus sections.

While this is of strategic benefit to the transmission network, it is described as essentially an extension and enhancement of the existing substation. It will not be incongruous to the established substation character in form or appearance. In previous cited cases the Board have determined that similar development was not strategic infrastructure. It is argued that the development does not constitute SID and does not meet the provisions set out in s.37A(2).

5.0 Relevant Planning Cases

I note a number of previous cases wherein the Board determined that proposed developments did not comprise strategic infrastructure development under s.182A, including:

ABP ref. 313964: Pre-application consultation in respect of the redevelopment of the existing Maynooth 220kV / 110kV electrical substation including replacement of the existing 220/110kV Air Insulated Switchgear (AIS) substation with a 220/110kV Gas Insulated Switchgear (GIS) substation.

ABP ref. 307228: Pre-application consultation in respect of a new Gas Insulated Switchgear (GIS) building to the southwest of the existing outdoor AIS substation, at the existing Ringsend 110kV Substation, Dublin 4. The proposed GIS building will have an expected footprint of c. 1,000 sq m, and will be a 2-storey structure c. 15m in height.

ABP ref. 303587: Pre-application consultation request in respect of a new 110kV GIS substation at Lanesboro 110kV Substation to replace the existing 110kV AIS substation which will be decommissioned once the GIS substation comes into operation.

ABP-300928-18: Redevelopment of the existing 110kV Kilbarry Electrical Substation including the addition of a new gas insulated switchgear (GIS) electrical substation within the existing compound, transfer of 4 no. existing 110kV circuits from the existing AIS substation to the proposed GIS substation.

ABP ref. VC0110: Pre-application consultation request in respect of a proposed new 110kV gas insulated switchgear (GIS) building, intended to replace the existing AIS substation, within existing Galway 110kV electricity substation compound, Ballybrit, including new line/cable interface masts, alterations to existing site entrance and associated works.

ABP ref. VC0101: Redevelopment of the existing 220 kV Inchicore Electrical Substation, including new GIS building to north of existing GIS building, new control room, associated works to accommodate transfer of switchgear equipment and existing cable relocation.

VC0063: Redevelopment of Killonan 220/110 kV Station in Co. Limerick, including construction of a new 110kV GIS substation building and a new 220kV GIS substation building, installation of new GIS and associated equipment, transfer of circuits from existing 220/110kV AIS station to the new 220/110kV buildings, and decommissioning of existing equipment.

VC0055: Redevelopment of the existing 400kV Moneypoint Substation, involving construction of new 400kV, 220kV and 110kV GIS buildings, transfer of circuits from the existing 400kV building to the new 400kV GIS building and from the existing 220kV and 110kV AIS equipment to the new 220kV and 110kV GIS buildings, decommissioning of existing GIS and AIS equipment.

VC0040: Redevelopment of the existing 220kV Finglas Substation, including construction of an indoor 110kV station within boundary of the existing Finglas 220kV station, transfer of circuits and decommissioning of old substation.

VC0061: Redevelopment of the existing 110kV Ardnacrusha Electrical Substation, consisting of replacement of outdoor 110kV AIS equipment with indoor 110kV GIS equipment, transfer of circuits from existing AIS 110kV substation to the new GIS substation, and decommissioning of existing substation.

VC0070: Installation of two new reactors at existing Poolbeg 220/110 kV Electrical Substation.

6.0 Legislative Provisions

Section 2(1) of the Planning and Development Act 2000, as amended defines 'strategic infrastructure' as including, inter alia: "(d) *any proposed development referred to in section 182A(1)*"

Section 182A(1) of the Act provides that, where a person (the 'undertaker') intends to carry out development comprising or for the purposes of electricity transmission, 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 182E(1) provides that a prospective applicant who proposes to apply for approval under section 182B or 182D shall, before making the application, enter into consultations with the Board in relation to the proposed development.

Subsection 182A(9) states that "... '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."

Section 2(1) of the Electricity Regulation Act 1999, as amended sets out the following definitions:

Transmission: "...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."

'Electric plant': ".....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"*

7.0 Assessment

As noted above, the definition of ‘strategic infrastructure’ includes development comprising or for the purposes of electricity transmission, with ‘transmission’ defined as either:

- The transport of electricity by means of a high voltage line of 110 kV or more, or an interconnector.
- The transport of electricity by means of a transmission system (a system of high voltage lines and electric plant 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, including interconnectors but excluding distribution system lines).

Based on this statutory definition and the information contained in the prospective applicant’s request, I am satisfied that the existing Poolbeg 220kV electrical substation can be regarded as part of the electricity transmission system for the purposes of the 2000 Act. In this regard, I also note that the station is identified on the Transmission System map provided on the EirGrid website¹.

Having regard to the details submitted with the pre-application consultation request, I consider that there is adequate information available to the Board to make a determination on this request. I do not consider that a consultation meeting is necessary in this instance.

The proposed development is described as the extension and enhancement of the existing 220kV substation, including the provision of a new Gas Insulated Switchgear building. The proposed development is relatively large in scale and the existing AIS substation will be retained and connected to the proposed new GIS infrastructure. The proposed development would not give rise to any fundamental change in the function of existing infrastructure at this location and would not be at odds with the prevailing energy and utility use of these lands. The request does not

¹ [Z:\Transmission Systems Engineering\Dan Askew\Working Folder\Transmission Map 2020\Final\Transmission Map V0.2 A3 \(1\) \(eirgridgroup.com\)](Z:\Transmission Systems Engineering\Dan Askew\Working Folder\Transmission Map 2020\Final\Transmission Map V0.2 A3 (1) (eirgridgroup.com))

identify any material deviation to the routes of established circuits and the proposed development would not result in the provision of a high voltage line.

As outlined above, the Board has previously determined a considerable number of requests for pre-application consultation in relation to proposed improvement / refurbishment / upgrade works to existing electrical infrastructure. Many of these have related to the replacement of older AIS infrastructure with new GIS substations. In particular, I note ABP-300928, which related to a similar development comprising the addition of new GIS infrastructure. The Board concluded that the development did not fall within the scope of section 182A of the 2000 Act, as amended.

Having regard to the nature and scale of the proposed development, the fact that it relates to an extension / expansion to an existing substation and associated transmission infrastructure, and noting previous determinations by the Board in respect of similar requests for pre-application consultation, I conclude that the proposed development would not fall within the scope of section 182A of the Planning and Development Act 2000, as amended, necessitating the making of an application directly to the Board.

8.0 Recommendation

I recommend that the prospective applicant, EirGrid plc., be informed that the proposed development, consisting of the upgrading of the existing Poolbeg 200kV Electrical Substation, at Pigeon House Road, Dublin 4 as set out in the plans and particulars received by An Bord Pleanála on the 04/10/2022, does not fall within the scope of section 182A of the Planning and Development Act 2000, as amended, and that a planning application should be made in the first instance to the relevant planning authority.

Conor McGrath SPI

02/11/2022