



An
Bord
Pleanála

Inspector's Report ABP-317599-23

Development	Proposed development of a 400 kV underground cable between Woodland 400 kV Substation
Location	located in the townland of Woodland, Co. Meath and Belcamp Substation in the townlands of Clonshaugh and Belcamp, Co Dublin, known as the 'East Meath – North Dublin Grid Upgrade.
Planning Authority	Meath County Council and Fingal County Council
Prospective Applicant	EirGrid plc.
Type of Application	Pre-Application Consultation under Section 182E of the Planning & Development Act 2000, as amended
Inspector	Niall Haverty

1.0 Introduction

- 1.1. The Board received a request on 19th July 2023 from EirGrid plc. to enter into a 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 400kV underground cable between Woodland Substation in Co. Meath and Belcamp Substation in Co. Dublin. The proposed development also includes works at both substations and is referred to as the 'East Meath – North Dublin Grid Upgrade'.
- 1.2. Two pre-application consultation meetings were held with the prospective applicant on the 8th September 2023 and the 28th November 2023, respectively. An email requesting closure of the consultation process was received on the 3rd January 2024.
- 1.3. This report provides an overview of the proposed development, relevant precedents and legislative provisions and recommends that the Board determine that the proposed development does constitute strategic infrastructure.

2.0 Site Location and Description

- 2.1. The existing Woodland 400kV Substation is located in the townland of Woodland, Co. Meath and the existing Belcamp Substation is located in the townlands of Belcamp and Clonshagh in Fingal, Co. Dublin.
- 2.2. The proposed cable route passes through a considerable number of townlands, which are listed in Table 3 of the report submitted by the prospective applicant with their request.
- 2.3. The cable route starts at Woodland 400kV Substation, which is located c. 2.5km north west of Batterstown and c. 4.5km south west of Dunshaughlin in Co. Meath. The substation is accessed from the L607 local road (the 'Red Road'). The cable route would travel south through fields for c. 3km, until it joins the R156 Regional Road at Barstown Industrial Estate. From there, the route follows the R156 eastward as far as Dunboyne, turning north along the R157 once it reaches the north western outskirts of the town.
- 2.4. As the route approaches the M3 Parkway, it crosses the River Tolka and follows an off-road crossing under the railway at M3 Parkway and under the M3 Motorway to the north of Junction 5.

- 2.5. The route then briefly progresses north along the R147 before travelling east once more along the L5026. At the junction with the L1010, the route turns to the north east, following the L1010, before turning east again through Nuttstown, crossing tributaries of the Pinkeen River. As the route continues eastward towards Kilbride it also crosses the Ward River. From this location, the route turns south east following an on-road route along the L1007.
- 2.6. Approaching Hollystown, the route remains on-road, crossing over two tributaries of the River Ward. Immediately north of Hollystown, opposite Kilmartin Lane, the route turns off-road to the south east.
- 2.7. The route passes through fields for c. 1.4km to the east of Hollystown, before turning back on-road at Killamonan, following the R121 to the north east. At the M2 Motorway, the route follows a localised off-road section to allow for a crossing south of the overbridge. The route remains on-road to cross the roundabout with the R135 and continues to follow the R121 through the townlands of Ward Lower, Newpark and Shallon. At the junction with the R122 in Skephubble, the route turns to the south east following an on-road route through Ballystrahan. At the junction with Toberburr Link Road (known as Kilreesk Lane), the route turns from the R122 onto the Link Road in an easterly direction towards Kingstown.
- 2.8. The route follows short off-road sections through fields for c. 0.5km between the Link Road and the R108, following the Naul Road along the northern boundary of Dublin Airport as far as Cloghran Roundabout, north east of Dublin Airport.
- 2.9. From there, the route briefly uses Stockhole Lane, travelling east, before crossing the M1 Motorway to the north of the overbridge. The route then passes through fields for c. 3km, travelling south to reach Belcamp substation.
- 2.10. The route is stated to be based on that identified in EirGrid's Emerging Best Performing Route Option Report, a copy of which was submitted with the request.
- 2.11. Refinements to the route alignment were also presented at the consultation meetings.

3.0 Proposed Development

3.1. The proposed development comprises a 400kV electricity transmission connection between the existing Woodland 400kV Substation and the existing Belcamp Substation, and includes the following elements:

- Installation of an underground cable (UGC), c. 37km in total length connecting the two substations. The UGC will be primarily along the public road but will also cross private lands. The UGC development includes:
 - Communications links and fibre optic cables running in the same trench as the UGC.
 - Joint bays, communications chambers and link boxes along the UGC alignment (required every c. 750m).
 - Temporary laydown areas, passing bays and water and utility crossings.
 - Upgrading of existing access tracks and new access tracks to facilitate access to the UGC and off-road joint bays where required.
 - Reinstatement of road surfacing.
- Upgrade to the existing Woodland Substation to include:
 - Additional electrical equipment and apparatus, similar to the existing Air Insulated Switchgear (AIS) equipment and apparatus. This may require the extension of the substation compound and extension to the existing control building to provide for cabinets and other electrical apparatus.
 - Renewal, alteration and removal of associated electrical equipment, including batteries and chargers, insulators, instrument transformers, overhead conductors, disconnectors, circuit breakers, surge arrestors, line traps, lightning masts and filter reactors, as required.
- Upgrade to the existing Belcamp Substation to include a new 400kV GIS building to provide:
 - Additional electrical equipment and apparatus, similar to the existing AIS equipment and apparatus. This may require the extension of the

substation compound and extension to the existing control building to provide for cabinets and other electrical apparatus.

- Renewal, alteration and removal of associated electrical equipment, including batteries and chargers, insulators, instrument transformers, overhead conductors, disconnectors, circuit breakers, surge arrestors, line traps, lightning masts and filter reactors, as required.
- All ancillary site development works including: site preparation works; site clearance and levelling; vegetation clearance and reinstatement; temporary hardstanding; access tracks and construction compound; diversion of overground and underground services as required; and landscaping.
- The potential of the 400kV UGC forming part of a wider 'transmission cable corridor' on the approach to Belcamp.

3.2. The stated purpose of the proposed development is to reinforce the network between East Meath and North Dublin and help meet the growing demand for electricity in the east of the country due to increased population and economic activity. It is also stated that the project is essential to meet the Government's Climate Action Plan targets for renewable energy, which includes transporting energy from offshore renewable sources.

4.0 Prospective Applicant's Case

4.1. The prospective applicant's case, as outlined in the report accompanying their initial request for consultation, can be summarised as follows:

- The development is for the purposes of electricity transmission, as defined in s. 182A(9) of the Act and the proposed development will ultimately form part of the 400kV transmission network.
- Proposed development may contribute substantially to the fulfilment of objectives in the NPF and RSES by ensuring a safe, secure and reliable supply of electricity in the region.
- It may be of strategic economic or social importance to the State when considering targets and objective set out in the Climate Action Plan.

- It may have a significant effect on the area of more than one Planning Authority, namely Meath County Council and Fingal County Council.
- The Board, in several previous proposals, determined that such cable projects did fall within the scope of s. 182A.
- It is considered that, given the nature, scale and function of the proposed development, it comprises SID, having regard to s.182A of the Act.

5.0 Relevant Precedents

5.1. The prospective applicant cites the following cases where the Board determined that proposed 400kV cable projects did comprise strategic infrastructure development under s.182A:

ABP Ref. No.	Description	Determination
314112	Development of a 400 kV underground cable between Dunstown 400 kV substation in the townland of Dunstown, Co. Kildare and Woodland 400 kV substation in the townland of Woodland, Co. Meath known as the 'Kildare-Meath Grid Upgrade'.	Is SID
305271	400kV Cross-Shannon Cable Project between Moneypoint 400kV substation, Co. Clare and Kilpaddoge 220kV station, Co. Kerry.	Is SID

5.2. In addition to the abovementioned cable cases, the following cases applicable to Woodland and Belcamp substations are also noted:

ABP Ref. No.	Description	Determination
314111	Upgrading of the existing Woodland 400 / 220kV Electrical Substation, including installation of additional outdoor AIS electrical apparatus, including an approx. 4ha extension to the existing compound.	Is <u>not</u> SID

	This includes: extension to both sides of the existing 400kV busbar; additional apparatus and works to two existing busbars to create sectionalising bays; relocation of existing transformer connections; extension to existing control building; renewal, alteration and / or removal of associated 400 / 200kV apparatus and equipment as required; ancillary site development works.	
314505	Proposed upgrade of the existing Belcamp 200 kV Electrical Substation, including 220kV GIS Switchgear building, STATCOM transformer, electrical equipment and ancillary development.	Is <u>not</u> SID

6.0 Legislative Provisions

6.1 Planning and Development Act 2000, as Amended

- 6.1.1. Section 2(1) of the Planning and Development Act 2000, as amended, ('2000 Act') defines 'strategic infrastructure' as including, *inter alia*:

"any proposed development referred to in section 182A(1)"

- 6.1.2. Under subsection 182A(1) of the Act, 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.

- 6.1.3. 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.”

6.1.4. 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.

6.2. Electricity Regulation Act 1999, as Amended

6.2.1. Section 2(1) of the Electricity Regulation Act 1999, as amended, ('1999 Act') 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”

- **'Distribution':**

“...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 switchgear and which is used for conveying electricity to final customers”.

7.0 Relevant Policy Context

7.1. Project Ireland 2040: National Planning Framework

7.1.1. Section 1.3, entitled 'Shared Goals – Our National Strategic Outcome' sets out a series of National Strategic Outcomes (NSOs). These include:

- **“Transition to a Low Carbon and Climate Resilient Society:** The National Climate Policy Position establishes the national objective of achieving transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050. New energy systems and transmission grids will be necessary for a more distributed, renewables-focused energy generation system, and connecting the richest sources of that energy to the major sources of demand.”

7.1.2. In relation to this NSO 8, the NPF also states that:

“The diversification of our energy production systems away from fossil fuels and towards green energy such as wind, wave, solar and biomass, together with smart energy systems and the conversion of the built environment into both generator/consumer of energy and the electrification of transport fleets will require the progressive and strategic development of a different form of energy grid.

The development of onshore and offshore renewable energy is critically dependent on the development of enabling infrastructure including grid facilities to bring the energy ashore and connect to major sources of energy demand. We also need to ensure more geographically focused renewables investment to minimise the amount of additional grid investment required, for example through co-location of renewables and grid connections.”

7.1.3. Among the actions for NSO 8 are:

- “Reinforce the distribution and transmission network to facilitate planned growth and distribution of a more renewables focused source of energy across the major demand centres.”

7.1.4. National Policy Objective 42 is noted:

- “To support, within the context of the Offshore Renewable Energy Development Plan (OREDPA) and its successors, the progressive development of Ireland’s offshore renewable energy potential, including domestic and international grid connectivity enhancements.”

7.2. Climate Action Plan 2023

7.2.1. Section 12.1.3, entitled ‘The Scale of the Challenge’ states that:

“Transformational policies, measures and actions, and societal change are now required to meet the electricity sector’s carbon budget programme and sectoral emissions ceilings.”

7.2.2. Section 12.3.1, entitled ‘Accelerate Renewable Electricity Generation’ states that measures to support Ireland’s renewables acceleration programme include:

- Strengthening the electricity system by upgrading the network and building supporting infrastructure at key strategic locations.
- Enable the use of the public road and potentially the rail networks for routing of new public and private electricity circuits.

7.3. Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019 - 2031.

7.3.1. Section 10.3 ‘Energy’, notes that a secure and resilient supply of energy is critical to a well-functioning region. Having regard to projected population growth and economic growth in the Region it is important that the existing electricity and gas networks can be upgraded to provide appropriate capacity to facilitate development of the Region.

7.3.2. It states that the development of renewable energy is dependent on the development of enabling infrastructure including grid facilities to bring the energy ashore and connect to major sources of energy demand.

7.3.3. It goes on to state that the Dublin and Eastern Region is the major load centre on the Irish electricity transmission system, and residential, commercial and industrial demand is expected to grow up to 2025 and beyond. Developing the grid in the Region will enable the transmission system to safely accommodate more diverse

power flows from renewable generation and also to facilitate future growth in electricity demand. These developments will strengthen the grid for all electricity users, and in doing so will improve the security and quality of supply.

8.0 Consultation Meetings

- 8.1. Two pre-application consultation meetings were held with the prospective applicant on the 8th September 2023 and the 28th November 2023, respectively, and the associated meeting records are attached to this file. At each meeting a presentation was made to the Board's representatives, which are also attached to the file.
- 8.2. The principal matters discussed at the first pre-application consultation meeting related to: the need for the proposal; alternatives considered; public and prescribed body consultation; design aspects of the proposal; construction methodologies; landowner consent issues; and issues pertaining to the environmental impacts of the proposed works, including loss of hedgerow, crossing of watercourses, biodiversity, cultural heritage, residential amenity, and road and traffic impacts. The potential interactions with existing Motorway and rail infrastructure were also discussed, as was the potential for cumulative/in-combination effects with other projects including the Kildare – Meath Grid Upgrade project.
- 8.3. Discussions at the second pre-application consultation meeting related to: proposed refinement of the cable route; watercourse and Motorway crossing methodologies; road and cable access to Belcamp, noting its potential future use for offshore wind connections; the extent of works in public roads; traffic management and environmental impacts, operational issues such as locating and fixing faults under the public road; necessity for ancillary elements such as marker posts (noting decision on section 5 referral ABP-313625-22); EIAR and NIS issues.

9.0 Assessment

9.1. Strategic Infrastructure

- 9.1.1. 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).

9.1.2. Based on this statutory definition and the information contained in the prospective applicant's request, I am satisfied that the existing substations at Woodland and Belcamp form part of the electricity transmission system for the purposes of the 2000 Act.

9.1.3. I am further satisfied that the proposed new 400kV underground cable connection between Woodland and Belcamp substations, and works at these substation sites to facilitate the connection of this new 400kV cable, would meet the definition set out in section 182A(1).

9.1.4. Finally, I note the Board's relatively recent determination in case ABP-314112-22, which related to a similar development proposal for a 400kV UGC connecting Dunstown and Woodland Substations and works at both substations. The Board concluded in that case that the development fell within the scope of section 182A of the 2000 Act, as amended, and consequently that an application should be submitted to the Board.

9.1.5. Having regard to the foregoing, I conclude that the proposed development would fall within the scope of section 182A of the 2000 Act, as amended, requiring that any application for approval be submitted directly to the Board.

9.2. **Prescribed Bodies**

9.2.1. In view of the nature, scale and location of the proposed development, as set out in the prospective applicant's submissions and in this report, it is recommended that the prospective applicant consult with the prescribed bodies listed in Appendix 1, in respect of any future application for approval.

10.0 Conclusion

10.1. 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 directly to the Board.

11.0 Recommendation

11.1. I recommend that the prospective applicant, EirGrid plc., be informed that the proposed development, consisting of the development of a 400 kV underground cable between Woodland 400 kV Substation in Co. Meath and Belcamp Substation in Co. Dublin, installation of additional electrical equipment and apparatus at both substations and ancillary development, known as the 'East Meath – North Dublin Grid Upgrade' and as set out in the plans and particulars received by An Bord Pleanála, falls within the scope of section 182A of the Planning and Development Act 2000, as amended. Accordingly, the proposed development would constitute strategic infrastructure within the meaning of the Act and any application for approval must therefore be made directly to the Board.



Niall Haverty
Senior Planning Inspector

4th January 2024

Appendix 1: Prescribed Bodies

- Meath County Council
- Fingal County Council
- Minister for Housing, Local Government and Heritage
- Minister for the Environment, Climate and Communications
- Minister for Transport, Tourism and Sport
- Commission for the Regulation of Utilities (CRU)
- An Taisce
- Heritage Council
- An Chomhairle Ealaíon
- Fáilte Ireland
- Córas Iompair Éireann
- Irish Rail
- Commission for Railway Regulation
- TII
- daa
- Uisce Éireann
- Inland Fisheries Ireland
- Office of Public Works