



An
Bord
Pleanála

Inspector's Report ABP 320205-24

Development

Extension to Grange Castle 110kV
substation

Location

Grange Castle Business Park

Planning Authority

South Dublin County Council

Type of Application

Pre-application consultation

Prospective Applicant

ESB

Inspector

Pauline Fitzpatrick

1.0 Introduction

- 1.1. The Board received a request on 18th July 2024 from ESB to enter into pre-application consultations under Section 182E of the Planning and Development Act, 2000, as amended, in relation to a proposed extension to the Grange Castle 110kV substation located in Grange Castle Business Park in south Dublin.

2.0 Site Location and Description

- 2.1. The outdoor Air Insulated Switchgear (AIS) 110kV substation, on a site with a stated area of 1.92ha, is located in Grange Castle Business Park in south-west Dublin. It is setback from the estate access road to the south from which it is accessed. The site is bounded by the Grand Canal to the north and a data centre to the east. A building is currently under construction to the south-east of the substation with a temporary construction compound serving same to the south-west.
- 2.2. The substation consists of a 110kV AIS compound including 5 no. power transformers, a control building, an MV switchgear module and a separate telecommunications compound. It is enclosed by palisade fencing.

3.0 Proposed development

- 3.1. The proposed development entails a 1,260 sq.m. extension to the compound on ESB and South Dublin County Council lands (to be acquired) to accommodate 1 no. new 110kV Line Bay, the extension of existing 110kV busbar and ancillary works.
- 3.2. The purpose of the extension is to provide extra capacity within the existing substation to accommodate increasing electrical growth and demand in the wider Clondalkin area.

4.0 Planning History

ABP 309551-21 – provision for 2 no. 110kV transmission lines connecting Coolderrig 110kV GIS substation to Grange Castle substation approved October 2021.

5.0 Precedent Cases

There are a material number of cases pertaining to works to existing substations which the Board has adjudicated on to date.

The following are noted:

ABP Ref.	Development Description	Decision Date	ABP Decision
316205	New line bay and associated underground cabling at Kellis 220kV substation, Co. Carlow.	2023	Not SID
315688	Modification and upgrade of the Letterkenny 110kV substation, Co. Donegal including expansion of existing compound to accommodate a new indoor GIS compound area.	2023	Not SID
314767	Upgrading of Poolbeg 220kV substation, Dublin.	2023	Not SID
314505	Upgrade of Belcamp 220kV substation Co. Dublin including new GIS building and compound extension.	2023	Not SID
314111	Upgrading of the existing Woodland 400/200kV substation including additional AIS electrical apparatus and extension to existing compound, Batterstown, Co. Meath.	2022	Not SID
313964	Redevelopment of Maynooth 220kV / 110kV substation including replacement of the existing 220/110kV AIS substation with a 220/110kV GIS substation.	2022	Not SID
311950	Modification and upgrade of the Dalton 110kV substation, Claremorris, Co. Mayo	2021	Not SID
307228	110kV GIS building at Ringsend 110kV substation, Dublin	2020	Not SID

304856	Line bay extension within the existing Cushaling 110kV substation, Co. Offaly.	2019	Not SID
303838	110 kV bay to connect to the existing busbar at Dunmanway 110 kV substation, Co. Cork.	2019	Not SID
303587	New 110kV GIS substation, Lanesborough, Co. Longford.	2019	Not SID
301876	Refurbishment and upgrade of a 220/110kV AIS substation and associated works at the existing 220/110 kV Maynooth substation.	2018	Not SID
300928	Development of a 110kV GIS substation and associated works at the existing 110kV Kilbarry substation, Co. Cork.	2018	Not SID

6.0 Prospective applicant's case

The case made can be summarised as follows:

- Having regard to precedent cases e.g. 303587, 307228 and 314767 where the Board considered works related to existing substations as not constituting SID, it is of the view that the proposed development does not constitute SID.
- Having regard to the nature, function and modest scale, the proposed extension is not of strategic importance to the State as intended by section 182A of the Act. It would not contribute substantially to the fulfilment of any of the NPF or RSES objectives and is wholly contained within the administrative area of South Dublin County Council.

7.0 Legislative provisions

- 7.1. Section 182A(1) of the Planning and Development Act, 2000 (as amended) requires that where a person (referred to as the 'undertaker') intends to carry out development comprising or for the purposes of electricity transmission, the undertaker shall prepare an application for approval of the development to the Board.

7.2. Section 182A(9) of the Act 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.

7.3. Section 2(1) of the Electricity Regulation Act, 1999 defines transmission as follows:

"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, 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. Electric plant is defined as follows:

"any plant, apparatus or appliance used for, or for 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 the consumer.*

8.0 **Assessment**

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 extension to the existing 110kV substation at Grange Castle entails a new 110kV line bay and extension of the existing 110kV bus bar so as to provide extra capacity within the existing substation in order to accommodate increasing local electrical growth and demand in the wider Clondalkin area served by the substation.

As noted previously 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 110kV or more, or an interconnector.
- The transport of electricity by means of a transmission system (a system of high voltage line 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 line.

Based on this definition I am satisfied that the existing Grange Castle 110kV substation can be regarded as part of the electricity transmission system for the purposes of the Planning Act.

The proposed development comprises an extension to and provision of additional infrastructure to an established and operational substation. The Board will note previous decisions it has made on SI pre application consultation requests in relation to amendments, additions and expansion of electricity substation infrastructure (including the cases referred to by the prospective applicant). It concluded that, notwithstanding the fact that the works represent infrastructural improvement to existing 110kV (or higher) rated substations on the transmission system, that the provisions of Section 182A were not applicable.

In the instant case I note:

- Whilst the existing 110kV substation is on the transmission network it is long established.
- Although the proposed development, comprising of an extension to facilitate a new line bay and bus bar represents additional infrastructure and plant, it

would not give rise to any fundamental or material change in the function, operation or purpose of the existing substation which will remain a 110kV substation.

- The nature and extent of the extension relative to the existing substation compound is small scale within an existing business park where no visual or landscape impacts would arise.
- The development subject of the request is not a class of development as set out in Schedule 7 of the Planning and Development Act, 2000, as amended, for the purposes of section 37A. In previous decisions on SID pre-application consultation requests in relation to electricity transmission infrastructure under Section 182E involving amendments, additions and expansion of electricity infrastructure the Board has exercised some discretion and used the broad definition of the Planning and Development (Strategic Infrastructure) Act 2006, “developments of strategic importance to the State”, and the criteria contained in section 37(A)(2) to determine such matters. I submit that the works do not reasonably meet the scale of strategic infrastructure development and the associated tests as set out in Section 37A(2) of the Act. They are not considered to be of strategic economic importance to the State, will not contribute substantially to the fulfilment of the NPF or the RSES and are wholly within the administrative area of a single planning authority.

9.0 Recommendation

I recommend that ESB be informed that the proposed extension of the existing Grange Castle 110kV substation located within Grange Castle Business Park, Co. Dublin as set out in the plans and particulars received by An Bord Pleanála on the 18th July, 2024, 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 South Dublin County Council.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

P. Fitzpatrick
Pauline Fitzpatrick

Senior Planning Inspector

29th August, 2024