

An
Bord
Pleanála

Inspector's Report ABP-322217-25

Development

220/110kV Gas Insulated Switchgear
substation

Location

East Wall Road, Dublin 1

Planning Authority

Dublin City Council

Type of Application

Pre-application consultation under
section 182E of the Planning and
Development Act 2000, as amended

Prospective Applicant

EirGrid

Date of Site Inspection

30th of May 2025

Inspector

Adrian Ormsby

1.0 Introduction

- 1.1. The Board received a request on the 3rd of April 2025 from EirGrid to enter into pre-application consultations under Section 182E of the Planning and Development Act, 2000, as amended ('2000 Act'), in relation to the proposed development of a 220/110kV Gas Insulated Switchgear substation on East Wall Road in Dublin 1.
- 1.2. The primary purpose of the pre-application consultation is to address the issue of whether or not the proposed development constitutes strategic infrastructure for the purposes of the Planning and Development Act 2000, as amended.
- 1.3. A record of the written consultations undertaken is on file.
- 1.4. This report provides an overview of the proposed development, as well as details of legislative provisions, and relevant precedents.

2.0 Site Location & Description

- 2.1. The proposed 220/110kV Gas Insulated Switchgear substation is located on the R131 East Wall Road In Dublin 1. The R131 runs along the site's southwestern boundary with a high boundary wall fronting the public path. The site is bounded to the north and east by the M50 and the Port Tunnel Control building, to the northwest by the Portside Business Centre, and to the southeast by a brownfield site.
- 2.2. The subject site currently presents as an underutilised brownfield site, with a western portion detailed in the pre-application consultations application documentation as used for car parking. The car parking facility did not appear to be in use and was not open to the public at the time of inspection. The submitted documentation indicates the site has an area of c. 1ha.
- 2.3. The consultation documentation also details the site is located approximately 50m south of the existing Finglas - Shellybanks 220 kV circuit.
- 2.4. The application documentation details the subject site is owned by the ESB.

3.0 Proposed Development

- 3.1. The proposed development is for a 220/110 kV electrical GIS substation comprising of the following elements-

- two buildings-
 - 1 no. 220kV GIS substation (c. 50m x 14m and 17m high) over basement
 - 1no. 110kV GIS substation (c. 50m x 14m x 17m high) over basement
- 3 no. transformers required to transform electrical power from 220kV to 110kV
- associated lightning protection poles
- electrical cables above and below ground located within the site boundary (no cables are proposed along adjacent public roads)
- light posts within the substation compound
- associated road access and ancillary car parking spaces including internal access roads
- the provision of an urban space and associated landscaping and screening to the East Wall Road
- the provision of 2.6 m high green palisade security fence/gates along the remaining boundaries to the north, east and west and
- all other associated site works.

4.0 Prospective Applicant's Case

4.1. The prospective applicant's case, as outlined in the cover letter submitted is summarised as follows:

- Due to the ageing nature of Dublin's electricity infrastructure, the 'Powering Up Dublin Programme' has been introduced by EirGrid as a means to strengthen key electricity infrastructure in Dublin and the surrounding area, making the city 'renewable ready'.
- 'Powering Up Dublin' will see the replacement of over 50km of high-voltage cables that have been in use for almost half a century, with the associated upgrades helping to transform and modernise the city's electricity supply.
- The programme will help Dublin grow and thrive as the demand for electricity increases in years to come.

- A new 220 kV/110 kV GIS substation has been identified as the best solution to address the city's growing electricity demand.
- The proposed GIS substation will be connected to the existing Finglas – Shellybanks 220 kV circuit in the North Inner City.
- The substation will
 - Support residential housing and commercial developments in the city centre
 - Address demand growth due to electrification of heat and transport
 - Improve the security of supply in the city centre, and
 - Bring renewable energy to the grid.

4.2. The following documents and drawings are submitted in support of this pre-consultation application:

- A Consultation Document (Cover Letter) prepared by EirGrid
- Site Location Map
- Indicative Site Layout & Elevation Masterplan Layout

4.3. There is no relevant planning history of note in the vicinity of the site.

5.0 Relevant Precedents

5.1. The prospective applicant cites a number of cases where the Board determined that similar substation development comprised SID under s182A. Those cases, and others that I consider to be of recent relevance, include:

ABP Ref. No.	Location	Development Description Summary	Decision Date	Decision
319879	Kildare	Proposed 220 kV GIS substation	25/10/2024	Is SID
320535	Meath	110 kV/38 kV/MV substation	25/10/2024	Is SID
319042	Roscommon	110 kV loop-in loop-out substation	25/10/2024	Is SID

316480	Offaly	110 kV substation	09/10/2024	Is SID
319699	Dublin	110 kV ESB supply, 110 kV underground cable network and 110 kV substation.	09/10/2024	Is SID
320154	Cork	220kV Air Insulated Switchgear (AIS) tail fed substation	23/09/2024	Is SID
317275	Roscommon	110 kV substation	23/09/2024	Is SID
313767	Clare	110kV substation	22/07/2024	Is SID
319140	Kildare	110kV substation	18/07/2024	Is SID
319155	Cork	110kV substation	19/06/2024	Is SID
318119	Kerry	220kV substation	15/05/2024	Is SID
319385	Galway	400kV substation	08/05/2024	Is SID

6.0 Legislative Provisions

6.1. Planning and Development Act 2000, as amended (PDA)

- Section 2(1) defines 'strategic infrastructure' as including, *inter alia*:
“(d) any proposed development referred to in section 182A(1)”
- Section 182A states-
“....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) states-

"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."

- Section 182E(1) states-

"A person ("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 (ERA)

- Section 2(1) 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 line':**

"...has the meaning assigned to it by section 4(1) of the ESB (Electronic Communications Networks) Act 2014."¹

¹ See section 6.3 of this report

○ **‘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”.

6.3. ESB (Electronic Communications Networks) Act 2014 (ESBA)

• Section 4(1) states:

○ *“...any line which is used solely or amongst other things for carrying electricity for any purpose and as including –*

(a) any support for any such line, that is to say, any structure, pole or other thing in, on, by or from which any such line may be supported, carried or suspended,

(b) any apparatus connected to or associated with any such line for the purpose of carrying electricity or electronic communications services, whether such apparatus is owned by the Board or by any company referred to in section 2 or by a company which has been provided access or services referred to in section 3, or

(c) any wire, cable, tube, pipe or similar thing (including its casing or coating) which is used for the purpose of carrying electricity or electronic communications services and which surrounds or supports or is surrounded or supported by, or is installed in

close proximity to, or is supported, carried or suspended in association with, any such line.”

7.0 Consultation Meeting

7.1. No meeting held.

8.0 Assessment

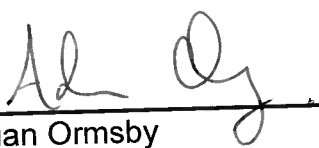
- 8.1.1. As noted in section 6 above, the definition of 'strategic infrastructure' includes development comprising or for the purposes of electricity transmission, with transmission described as either-
- The transport of electricity by means of a high voltage line of 110 kV or more, or an interconnector.
 - 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).
- 8.2. It is intended the proposed substation will connect to the existing Finglas - Shellybanks 220 kV circuit which runs c. 50m north of the application site as shown in Figure 1 of the submitted Cover Letter.
- 8.3. The proposed substation development also includes three 220kV to 110kV transformers to transform electrical power with both under and overground electrical cables detailed within the site boundary.
- 8.4. On the basis of the information submitted, it is considered that the proposed 220kV substation and the associated works which are intended to connect into the existing Finglas - Shellybanks 220 kV circuit constitutes the 'transport of electricity by means of a transmission system' as defined in Section 2(1) of the ERA and therefore meets the definition of transmission as set out in S182A(9) of the PDA. Accordingly, I consider the proposed 220kV infrastructure would fall under S182A (1) of the Act and would be deemed to be Strategic Infrastructure Development.

- 8.5. In conclusion, therefore, I recommend that the Board issue a determination that the proposed development consisting of a 220 / 110 kV 220/110kV Gas Insulated Switchgear substation does fall within the scope of section 182A of the 2000 Act, as amended and that a planning application should be made directly to the Board.
- 8.6. A list of prescribed bodies is set out in Appendix 1.

9.0 Recommendation

- 9.1. I recommend that EirGrid be informed that:
the proposed 220/110kV Gas Insulated Switchgear substation on lands at East Wall, Dublin 1 as set out in the plans and particulars received by An Bord Pleanála on the 03rd of April 2025 falls within the scope of section 182A of the Planning and Development Act 2000, as amended, and that a planning application should therefore be made directly to the Board.

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.



Adrian Ormsby
Senior Planning Inspector

30th of May 2025

10.0 Appendix 1: Prescribed Bodies

The following is a list of prescribed bodies considered relevant by the Board:

- Minister for Housing, Local Government and Heritage
- Minister for the Environment, Climate and Communications
- Dublin City Council
- Commission for the Regulation of Utilities
- Transport Infrastructure Ireland
- Uisce Éireann
- Inland Fisheries Ireland
- Office of Public Works
- An Taisce
- Heritage Council
- An Chomhairle Ealaíon
- Fáilte Ireland
- ESB
- Health Service Executive

Further Notifications should be made where deemed appropriate.