

An
Coimisiún
Pleanála

Inspector's Report ACP-323789-25

Development	Proposed development of a 110/38kV/MV substation
Location	In the townland of Belcamp, Clonshaugh, Dublin 17
Planning Authority	Dublin City Council
Applicant(s)	The Electricity Supply Board
Type of Application	Pre-Application Consultation under Section 182E of the Planning and Development Act, 2000 (as amended)
Date of Site Inspection	27 th November 2025
Inspector	Laura Finn

Contents

1.0 Introduction	3
2.0 Site Location and Description.....	3
3.0 Proposed Development.....	4
4.0 Pre-Application Consultations	4
5.0 Planning History	4
6.0 Precedent Cases.....	5
7.0 Prospective Applicant's Case.....	6
7.1 The Purpose of the Proposed Substation.....	6
7.2 Legislative Basis.....	7
7.3 Precedent Case.....	8
7.4 Conclusion.....	8
8.0 Legislative Provisions.....	8
8.1 Planning and Development Act 2000, as amended.....	8
8.1.1 Strategic Infrastructure	8
8.1.2 Transmission.....	9
8.2 Electricity Regulation Act 1999, as amended	9
8.2.1 Transmission.....	9
8.2.2 Distribution.....	10
8.2.3 Electric line	10
8.2.4 Electrical plant	10
9.0 Assessment.....	11
10.0 Conclusion	13
11.0 Recommendation.....	13
Appendix 1: Prescribed Bodies.....	14

1.0 Introduction

The Coimisiún received a request on 2nd October 2025 from the prospective applicant, The Electricity Supply Board (ESB), to enter into pre-application consultations under Section 182E of the Planning and Development Act, 2000 (as amended) in relation to the proposed development of a new 110/38V/MV substation in the townland of Belcamp, Dublin 17.

The purpose of the pre-application consultation is to address the issue of whether or not the proposed development constitutes Strategic Infrastructure Development (SID) for the purposes of the 2000 Act, as amended by the Planning and Development (Strategic Infrastructure) Act 2006.

This report provides an overview of the proposed development, the relevant legislative provisions and an opinion as to whether or not the proposal is SID.

My recommendation is that the proposed development **does** constitute SID.

2.0 Site Location and Description

The subject site known as '*Belmayne 110/38kV/MV Distribution Substation*' is located immediately west of the Bewley's production facility in the townland of Belcamp, Dublin 17.

The proposed substation site is accessed directly off the R139 Road. The R139 is a route in the north of Dublin linking the M1 / M50 at Clonshaugh to the R106 in Baldoyle. It incorporates the former N32, sometimes referred to as the Northern Cross Route Extension. The existing access off the R139 serves as an access to Belcamp House.

The site is currently surrounded by open lands, which is undergoing residential development to the northeast and future residential and industrial/infrastructure to the north and west.

The site is located within Dublin City Council administrative boundary. The subject site is situated on lands zoned Strategic Development and Regeneration Area (SDRA) in the Dublin City Development Plan 2022 – 2028. Specifically, the lands are located within SDRA 1 – Clongriffin/Balmayne and Environs, where the lands are indicated as being located in LAP Phase 6 Lands.

3.0 Proposed Development

The proposed development comprises a new 110/38kV/MV substation (referred to as Belmayne 110/38kV/MV Distribution Substation) as follows;

- A 110 kV GIS building with 8 x 110 kV bays;
- A 38kV/MV GIS building with 14 x 38kV bays and 13 MV bays;
- 2 no. 110/38kV DSO transformers in transformer bays with associated electrical equipment;
- 2 no. 38 kV/MV DSO transformers in transformer bays with associated electrical equipment;
- 3 no. Arc-Suppression Coils with associated electrical equipment;
- 110kV underground cabling between the 110 kV GIS building and Belcamp 220/110 kV substation;
- 38kV and MV underground cabling to feed distribution substations and new / existing loads in the vicinity; and
- All associated site development works including provision of access roads, lighting boundary walls/fences, landscaping, site services including drainage and all other works.

The substation will be accessed from an existing access point off the R139 road.

4.0 Pre-Application Consultations

The prospective applicant confirmed, in response to correspondence from An Coimisiún Pleanála, that they did not seek a pre-application consultation meeting with representatives of the Commission. As such, a meeting was not held regarding this case. A written record of the consultations undertaken has been attached to the file.

5.0 Planning History

There is no recent relevant planning history on the subject site.

6.0 Precedent Cases

Please note that where the Board is mentioned in the planning history below, that this now relates to An Coimisiún Pleanála (ACP);

No.	File Ref	Development Description	Decision Date	Decision
1	323569	110kV Air Insulated Switchgear (AIS) electricity substation and a loop-in/loop-out grid connection to the existing Inniscarra Macroom 110kV overhead line on lands at Aglish and Currahaly in Co. Cork	2025	SID
2	323441	110kV Gas Insulated Switchgear (GIS) electricity substation and grid connection to serve Drumdowney Solar Farm, Co. Kilkenny	2025	SID
3	321580	110kV Substation and Cable Connection in Kells, Co Meath	2025	SID
4	319470	110kV substation and 110kV underground cable connecting the substation to the existing ESB 220kV Kellistown substation, Co. Carlow	2025	SID
5	322289	110kV customer substation, a 110kV underground cable and a new 110kV strategic station including 6 LCIMs (Line to Cable Interface Masts) in Celbridge, Co. Kildare	2025	SID
6	321687	A new 110/38kV/MV Station and all associated works at Raheen Business Park, Ballycummin, Co. Limerick	2025	SID
7	319699	110kV ESB supply, 110kV underground cable network and 110kV substation, Dublin 8	2024	SID
8	311394	110kV electrical substation, a 110kV loop in/loop out cable connection to the Kinnegad Rinawade 110kV overhead line and all associated development, Co. Kildare	2024	SID
9	317988	110kV substation and loop-in connection associated with an approved solar farm development in Navan, Co. Meath	2024	SID
10	319735	110 kV / 38 kV/MV electrical substation, Donore Rd, Drogheda, Co. Meath	2024	SID
11	317824	110kv substation and underground connection from Scart Mountain Windfarm to Dungarvan Substation in Co. Waterford	2024	SID
12	317654	110kV/20kV distribution station, Fosterstown, Co. Meath	2023	SID
13	315476	110 kV substation to feed into Drumline-Ennis 1 10 kV OHL circuit, in Coolshamroge, Co. Clare	2023	SID

14	314739	110kV substation, Belinstown, Swords, Fingal	2023	SID
15	315430	A 110kV substation and its grid connection options to the transmission network at Maganey Solar Farm, Co. Kildare	2023	SID
16	316225	A new 110kV / MV station and associated underground cables at St Vincent's University Hospital Campus (SVUH), Elm Park, Dublin 4	2023	NOT SID

7.0 Prospective Applicant's Case

The applicant considers the proposed development **does not** fall within the scope of Section 182A of the PDA and should not be regarded as SID, in accordance with the criteria set out in section 182A of the PDA.

The prospective applicant's case as outlined in the cover letter submitted can be summarised as follows;

- This project is an ESB Networks Distribution System Operator (DSO) station which will be fed by new 110 kV underground cables connecting the proposed development into the existing Belcamp 220 / 110 kV substation.
- The proposed substation associated 110kV underground cables, and connection interface with Belcamp 220 / 110 kV substation will form part of ESB Networks 110 kV Distribution System and will be operated by ESB Networks in its capacity as the Distribution System Operator (DSO).
- It will not be a node on the national electricity transmission grid as operated by EirGrid in its capacity as the transmission system operator (TSO).
- The substation will be looped into the existing Belcamp 110kV station via a 110kV double circuit cable (See Figure 3 of applicants cover letter).

7.1 The Purpose of the Proposed Substation

The applicant highlights that the primary purpose and technical design of the substation is to serve the increasing electricity demands of the surrounding area.

The applicant notes that there are a number of drivers for the new 110/38 kV/MV station, all of which will contribute to additional capacity and improvements in the security of supply for the area as follows;

- The load on Grange 38 kV/MV station is 17.54 MVA, the winter firm capacity for this station is 15MVA with a short time load limit of 18MVA.
- Dart applications requests for MIC increases for North Coastal in Malahide, Portmarnock, Bayside, Raheny and Fairview.
- Dublin City Council (DCC) have identified that the North Fringe area will ultimately provide for approximately 7,000 new housing units as well as associated retail, commercial and hotel facilities to be developed over the next c. 5-10 years.
- The new housing in the North Fringe also requires the development of a water treatment plant and previous applications indicated this could be 4-5 MVA.
- Fingal County Council in Local Area Plans have identified the neighbouring Stapolin (1500-2000 units) and Portmarnock (1200 units) areas as having the potential to provide significant additional housing units.
- The Finglas Rural 110kV Network is currently out of N-1-1 planning standard. This means it will remain difficult to transfer load to Kilmore from Grange once Newbury has been moved to Belcamp.
- There have been significant new demand applications in the Kilmore vicinity (18 MVA).

7.2 Legislative Basis

In accordance with S. 182A(9) '*transmission*' shall be construed in accordance with S. 2(1) of the Electricity Regulation Act, 1999, and also by the transport of electricity by means of high voltage line that would be 110 kV or more.

The applicant notes in Section 4.2.2 of their cover letter, that there is no threshold under Section 182A(9) of the Planning and Development Act, 2000 (as amended) in respect of a substation. Section 182A(9) explicitly refers to high voltage lines of 110kV or more.

In the applicant's opinion, the proposed substation constitutes '*electrical plant*' as defined under Section 8.2.4 of this report, as it will be used to distribute electricity to convey electricity to final customers.

The applicant notes that the new substation and associated underground cables will form part of the existing ESB Networks distribution system and will not be a node on the national electricity transmission grid as operated by EirGrid in its capacity as the transmission system operator (TSO).

Based on the definition above, the applicants have stated that it is for the ESB and the CRU to specify which lines and associated substations form part of the distribution system and further note that the Belmayne substation and electrical lines looping it into the distribution system is a line and substation designated by the ESB as being part of the distribution system.

The applicant states that because this project will connect to the distribution network, it is submitted that the proposed development does not meet the definition of electricity transmission under section 2(1) of the Electricity Regulation Act 1999 (See definition in Section 8.2.1 of this report). Therefore, it is considered that it does not fall within section 182A of the PDA and should not be deemed to be SID.

7.3 Precedent Case

The applicant under Section 4.2 of their cover letter has presented planning precedent set by ACP in File Ref - ABP-316255-23 at St Vincents Hospital for the proposed installation of a new 110kV / MV substation and associated underground cables and has stated that the proposed Belmayne substation will be broadly similar in nature and function to the substation at St Vincents Hospital, which was determined not to constitute SID.

7.4 Conclusion

A determination is sought from the Coimisiún as to whether or not the proposal is SID. The prospective applicant considers that it is not SID.

8.0 Legislative Provisions

8.1 Planning and Development Act 2000, as amended

8.1.1 Strategic Infrastructure

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

'any proposed development referred to in section 182A(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 for the development under section 182B and shall apply to the Board (now referred to as ACP) for such approval accordingly.

8.1.2 Transmission

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.'*

8.2 Electricity Regulation Act 1999, as amended

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

8.2.1 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, 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'.

In this instance, the Board refers to the Electricity Supply Board, and the Commission refers to the Commission for Electricity Regulation.

8.2.2 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.'

8.2.3 Electric line

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

The definition set out in s.4(1) of the 2014 Act is as follows:

"...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

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."

8.2.4 Electrical plant

'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.'

9.0 Assessment

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).

The proposed development as described in Section 3.0 of this report comprises a new 110 kV / 38kV/MV 'loop-in/loop out' electricity substation to serve the increasing electricity demands of the surrounding area, as described in Section 7.1 of this report. The substation will be looped into the existing Belcamp 110kV substation via a 110kV double circuit cable.

Under section 182A of the Planning and Development Act 2000 (as amended) an undertaker shall apply to the Board for approval of a development comprising or for the purposes of '*energy transmission*'.

Section 182A(9) states that '*transmission*' shall be construed in accordance with Section 2(1) of the Electricity Regulation Act, 1999 and shall also be construed as meaning *inter alia* the transport of electricity by means of a high voltage line where the voltage would be 110kV or more.

The definitions of '*transmission*', '*electric line*', '*electric plant*', and '*distribution*' as set out in section 2(1) of the Electricity Regulation Act 1999 are detailed in Section 8.2 of this report.

As outlined above, Section 182A(9) includes a threshold of 110kV in order for a high voltage electricity transmission line to be considered strategic infrastructure, however, no threshold is set in respect of a substation. I consider that the proposed 110kV substation constitutes '*electrical plant*' as defined in Section 8.2.4 of this report, in that it is plant for transmission, distribution and supply of electricity.

The proposed 110kV GIS substation is part of a transmission system which "*consists, wholly or mainly, of high voltage lines and electric plant and which is used for conveying electricity from...one substation to another*".

The proposed development involves 110kV underground cabling between the proposed 110kV GIS building and the existing Belcamp 220/110 kV substation. As such, I consider the proposed substation also falls within the definition of transmission as set out in section 182A(9) of the Act, based on the development comprising the connection of one substation to another substation for the purposes of transporting electricity via 110kV high voltage lines.

The definition of '*transmission*' under the 2000 Planning Act incorporates both the electricity regulation definition and the transport of electricity by means of a high voltage line, therefore a development including a substation of at least 110kV comprises '*transmission*' under the 2000 Planning Act, regardless of any interpretation under the Electricity Regulation Act.

I recognise that the applicant points to a 2023 decision, ABP-316225-23 which concerned the proposed installation of a new 110kV substation at St. Vincent's University Hospital, which was determined to not be SID. Nevertheless, I consider that most recent decisions by the Coimisiún demonstrate that tail-fed substations are within the scope of SID provisions.

The proposed development is comparable to several precedent, detailed in Section 6.0 of this report, where An Coimisiún Pleanála determined that similar 110kV substations and grid connection cables constituted SID. Accordingly, I am satisfied that the proposed development constitutes SID within the meaning of the Planning and Development Act, 2000 (as amended).

I consider the proposed development comprising 110kV / 38KV/MV substation and associated underground cables which is designed to operate at a transmission voltage of 110kV to come within the definition of '*transmission*'.

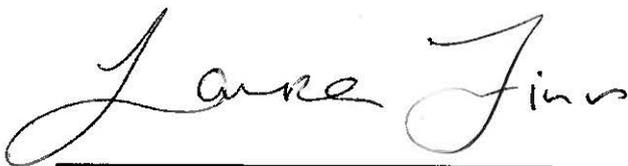
10.0 Conclusion

I consider that the proposed development consisting of a new distribution 110/38kV/MV substation, 110kv underground grid connection to the Belcamp 220kV /110kV substation, and associated work, does fall 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 An Coimisiún Pleanála. Given the scale, nature and location of the proposed development, it is recommended that the prospective applicant consult with the prescribed bodies listed in Appendix 1 of this report regarding any application for approval.

11.0 Recommendation

I recommend that the prospective applicant, The Electricity Supply Board be informed that the proposed 'Belmayne 110/38kV/MV Distribution Substation' comprising the installation of a substation and underground cables at Clonshaugh, Dublin 17, as set out in the plans and particulars received by An Coimisiún Pleanála on the 2nd October 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 Coimisiún.

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.



Laura Finn

Senior Planning Inspector

10th December 2025

Appendix 1: Prescribed Bodies

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

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

Further notifications should also be made, where deemed appropriate.