

An
Coimisiún
Pleanála

Inspector's Report ABP-324084-26

Development	The proposed development of a new distribution 110kV/MV substation
Location	Lands at Grangegorman Campus, Dublin 7
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	The Electricity Supply Board
Site visit	22 nd September 2026
Inspector	Donal Donnelly

1.0 Introduction

- 1.1. The Commission received a request on 12th February 2026 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 ('2000 Act'), in relation to the proposed development of a new distribution 110kV/MV substation on lands at Grangegorman Campus, Dublin 7.
- 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 2000 Act.
- 1.3. One pre-application consultation meeting was held with the prospective applicant on 30th June 2026. A record of the meeting is on file. An email requesting closure of the consultation process was received on the 21st August 2026.

2.0 Site Location & Description

- 2.1. The subject site is located in Grangegorman to the north of Dublin City. The Luas Green Line and Broadstone Bus Depot are immediately east of the site and Mourne Villas are to the north. To the west of the site is the former Richmond Penitentiary building dating from 1816.
- 2.2. Access to the site is off Grangegorman Lower to the west. The main TUD University Campus is on the western side of Grangegorman Lower. The site is currently brownfield with an area of approximately 0.187 hectare.

3.0 Proposed Development

- 3.1. The proposal comprises the development of a new distribution 110 / 20 kV Gas Insulated Switchgear (GIS) electrical substation, which will include the following:
 - A 110 kV GIS building with 8 x 110 kV bays and 16 x MV bays;

- Two 110 kV / MV 31.5 MVA transformers in transformer bays with associated electrical equipment;
- Associated and ancillary outdoor electrical equipment and other apparatus, including installation of underground cables;
- All associated site development works including provision of access roads, lighting, boundary walls with site services, including drainage and all other works.

3.2. The proposed substation will loop into the existing Cabra – Wolfe Tone Street 110 kV underground circuit with the connection route continuing north from the site along Rathdown Road.

4.0 Prospective Applicant's Case

4.1. The prospective applicant's case is that the new 110 kV / MV distribution substation is required in the North Dublin City area to provide network reinforcement and increased capacity. The drivers for the proposed development as set out in the prospective applicant's cover letter are as follows:

- Injection of new MV capacity to offload the existing 38 kV stations, improving continuity and security of supply to the North Dublin area by providing additional network capacity, reducing loads at the existing substations and providing increased connectivity between substations;
- Kingsbridge and Watling Street 38 kV substations will be offloaded to the proposed substation, providing additional capacity to the South Dublin City area;
- Offloading of the current 38 kV substation mesh is required to facilitate capacity for the proposed customer 38 kV substation for Irish Rail located in Glasnevin as part of the DART+ electrification project;
- Increased load request for the upgrade of Broadstone Bus Depot to enable charging of Hybrid and Electric buses;
- Further development of the Grangegorman Strategic Development Zone;

- Significant mixed-use developments planned in the area by the LDA in Phibsborough, Stoneybatter and by private developers around O'Connell Street, Moore Street and Parkgate Street; and
- Provide capacity in the wider region for the electrification of heat and transport as per Government targets.

4.2. The prospective applicant considers that the proposed development is similar to case VC29S.316225 at St. Vincent's University Hospital Campus, which was determined not to be strategic infrastructure on the basis that it would form part of the distribution rather than the transmission infrastructure. The purpose of the substation in the St. Vincent's case was to increase load to the medical customer as an end user and not as part of the national grid or as a new node on the system. It is submitted that the proposed development will not be a node on the national electricity transmission grid and will connect to the distribution network. The prospective applicant considers that it is for the ESB and the CRU to specify which lines and associated substations form part of the distribution system.

5.0 Relevant Precedents

- 5.1. The prospective applicant cited the St. Vincent's case where the Commission determined that this development did not comprise SID under s.182A.
- 5.2. During the pre-application meeting, the Commission's representatives referenced case ACP-3222700-25, which was recently decided to be 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 2000 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 Commission 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 Commission 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 Commission 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 Commission.”

- '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 Commission 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."*

- '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 Consultation Meeting

- 7.1. One pre-application consultation meeting was held with the prospective applicant on the 30th June 2026. The meeting record relating to this development proposal and the presentation made by the applicant to the Commission's representatives are attached to the file.

8.0 Assessment

- 8.1. 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).
- 8.2. 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.

- 8.3. Section 2(1) of the Energy Regulation Act defines the transmission system as a system which consists wholly or mainly of high voltage lines and electrical plant 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.
- 8.4. The applicant describes the proposal as a 110 kV GIS building (c. 44 x 14 x 13m high); 2 x 110 kV / MV transformers and associated fire walls (c. 6.1 m high); and associated electrical equipment and underground cabling. The proposed substation will loop into the existing Cabra – Wolf Tone Street 110 kV underground circuit, which runs along the North Circular Road, approximately 0.55 km north of the proposed substation. This grid connection will consist of 2 no. 110 kV underground circuits installed within the existing road along Rathdown Road.
- 8.5. The purpose of the proposed development is to facilitate additional load demands on the network and to improve continuity and security of supply. The proposed substation will cater for further development at Grangegorman, as well as the DART+ electrification project, charging of Hybrid and Electric buses at Broadstone Depot, and surrounding mixed-used developments.
- 8.6. The Commission will also note previous decisions on pre-application consultation requests in relation to electricity transmission infrastructure under Section 182E where it was determined that the provision of a 110kV substation and associated 110kV cabling constitutes SID. Most notably, under ABP-322700-25 the Commission decided that the installation of a new 110/38/kV/MV substation at a site currently located within the Diageo complex, Dublin 8 falls within the scope of section 182A of the Planning and Development Act 2000, as amended. As with the Diageo proposal, the current proposal includes an associated 110kV transmission line. The proposal therefore constitutes a development including a substation of at least 110kV, which comprises 'transmission' under the 2000 Planning Act, regardless of any interpretation under the Electricity Regulation Act.
- 8.7. The primary legislation with respect to this pre-application request relates to the Planning and Development Act 2000 (as amended), where Subsection 182A(9)

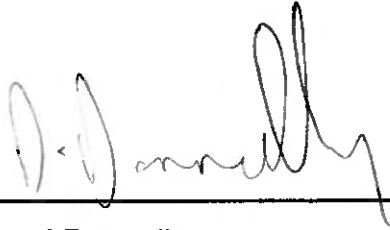
states that “‘transmission’, in relation to electricity, shall be construed in accordance with section 2(1) of the Electricity Regulation Act 1999 but, for the purposes of this section, the foregoing expression, in relation to electricity, shall also be construed as meaning the transport of electricity by means of (c) a high voltage line where the voltage would be 110 kilovolts or more, or (d) an interconnector, whether ownership of the interconnector will be vested in the undertaker or not.”

- 8.8. The transport of electricity by a high voltage line of 110kV forms part of the proposed development subject to this pre-application request and therefore I consider that this meets the definition of electricity transmission under section 2(1) of the Energy Regulation Act and Section 182A of the 2000 Planning Act.
- 8.9. In conclusion, therefore, I recommend that the Commission issue a determination that the proposed 110kV/MV substation and grid connection to the existing Cabra – Wolfe Tone Street 110 kV underground circuit 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 Commission.
- 8.10. A list of prescribed bodies is set out in Appendix 1.

9.0 Recommendation

- 9.1. I recommend that the prospective applicant, The Electricity Supply Board, be informed that the proposed 110kV/MV substation and grid connection on lands at Grangegorman Campus, as set out in the plans and particulars received by An Coimisiún Pleanála on the 12th February 2026 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 Commission.

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.

A handwritten signature in black ink, appearing to read 'D. Donnelly', is written above a horizontal line.

Donal Donnelly

Planning Inspector

Date: 25th September 2026

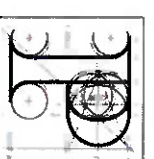
Appendix 1: Prescribed Bodies

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

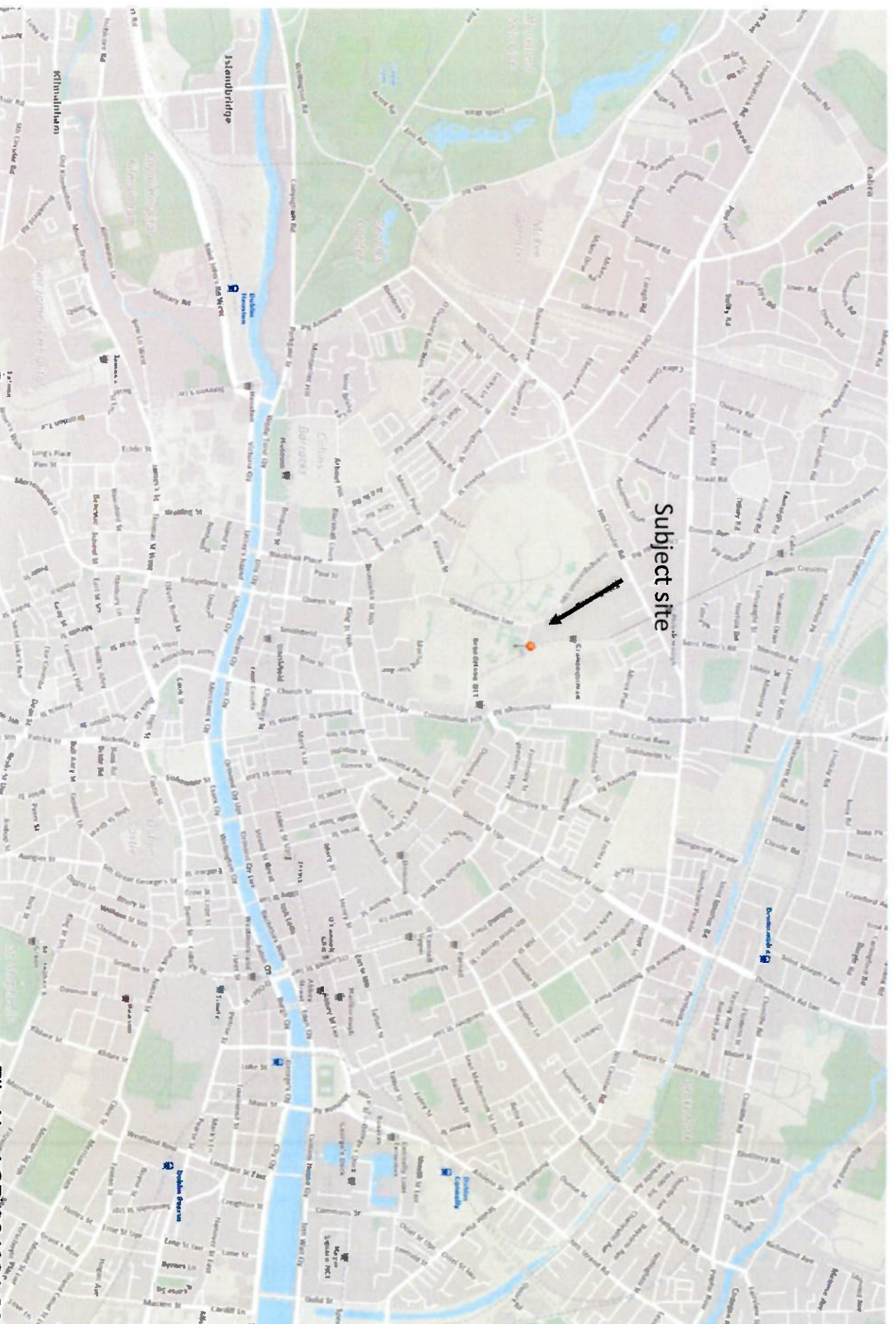
- Minister for Housing, Local Government and Heritage
- Minister for the Environment, Climate and Communications
- Dublin City Council
- Commission for the Regulation of Utilities
- Transport Infrastructure Ireland
- Uisce Éireann
- Inland Fisheries Ireland
- Office of Public Works
- HSE
- An Taisce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

Further notifications should also be made, where deemed appropriate.

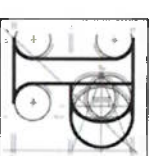
Site Location Map



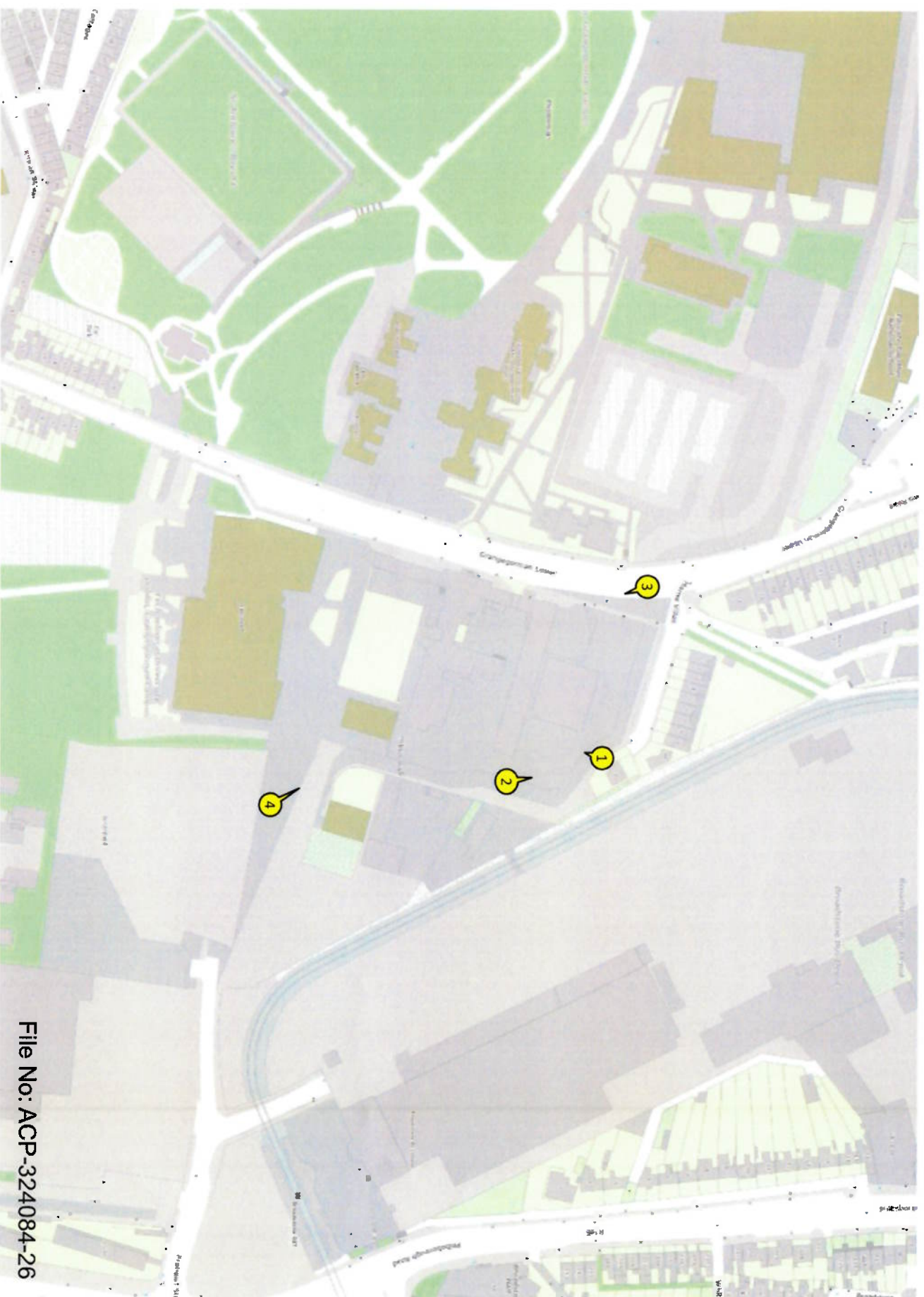
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Approximate Location of Site Photographs



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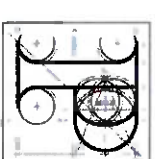
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**Image 1: View looking
south at site**

**Image 2: View looking north
at site**





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**Image 3: View of former
Richmond Penitentiary
building**

**Image 4: View looking north
towards site from walkway**

