

An
Coimisiún
Pleanála

Inspector's Report ACP-324386-26

Development

The proposed development
Ridgewood 110V/MV Gas Insulated
Switchgear (GIS) electrical substation

Location

Lands at in the townland of Forrest
Great, Swords, Co. Dublin

Planning Authority

Fingal County Council

Type of Application

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

Prospective Applicant

ESB

Inspector

Hugh O'Neill

1 Introduction

The Commission received a request on 18th June 2026 from the prospective applicant, 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 Ridgewood 110V/MV Gas Insulated Switchgear (GIS) electrical substation on lands in the townland of Forrest Great, Swords, Co. Dublin.

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.

A record of the written consultations undertaken is on file.

This report provides an overview of the proposed development as relates to status as Strategic Infrastructure, as well as details of legislative provisions, and relevant precedent.

2 Site Location & Description

The prospective site is formed on 3 sides by substantially intact historic townland boundaries formed by mature diverse hedgerows containing trees. The northeastern corner of the site is the confluence of 3 townlands, Rathingle, Brackenstown and Forrest Great. There is no existing southern boundary with a continuation of commercial poly tunnels.

The wider area of the site is currently occupied by a series of commercial glasshouses, polytunnels and waste handling operations in the area proposed for the substation. The site is at northern edge of a substantial fruit and vegetable enterprise.

The site is located at c. 1km south of the Ward River and 1km north of the northern boundary of Dublin Airport. The eastern boundary is shared with Ridgewood football pitches. Ridgewood housing estate is located c.270m to the east of the prospective site. Ridgewood forms the eastern boundary of the Greenbelt zoning in which the prospective site is located.

In addition to the Greenbelt zoning objective, the proposal is also centred on a road objective in the operative development plan.

3 Proposed Development

The prospective applicant states that the proposed development is at a preliminary design stage and design elements are likely to change but that the general technical requirements for the project which will remain unchanged. These general technical requirements are described by the prospective applicant as follows:

- A new substation compound (c. 4,100 sq.m) with 2.6 m high palisade fence;
- A 110 kV GIS building with 8 x 110 kV bays and 20 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, fencing with site services including drainage and all other works
- Loop into the existing Finglas – Stephenstown 110 kV overhead line, located approximately 2 km north of the site with 110 kV underground cables.
- Two new Line-Cable Interface Masts (LCIMs) will be constructed along the existing overhead line to facilitate the connection of the underground cable to the overhead line.
- An existing section of the overhead line will be removed following construction of the new LCIMs

The site is to be accessed via an existing entrance and private road from the R108.

The applicant also sets out the following description regarding operation of the proposed substation:

- The substation will be a distribution substation with the 110 kV circuits feeding the substation, the 110 kV GIS building, 110 kV / MV transformers

and the MV offloading circuits all forming part of the Distribution Network operated by ESB Networks DAC as the Distribution System Operator (DSO).

- The substation will be owned by ESB Networks as the Distribution Asset Owner (DAO). 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).

4 Prospective Applicant's Case

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

- The substation will be a distribution substation serving the North Dublin Area as part of the ESN ten year distribution network development plan.
- The substation will be owned by ESB networks and will not be a node on the transmission grid operated by EirGrid.
- The June 2023 decision of An Bord Pleanála in case ref: 316225 relating to a new substation for St. Vincent's Hospital is relied upon as precedent. In this case the Board agreed with the Inspector that the substation, designed to serve the hospital campus was not SID.
- Section 182A (9) of the Act sets a threshold of 110kV for a high voltage electricity transmission line to be considered strategic infrastructure. No threshold is set in respect of a substation.
- The proposal falls within the definition of 'distribution' as its primary purpose is to convey electricity to final customers.
- The proposed development does not meet the definition of electricity transmission under section 2(1) of the Electricity Regulation Act 1999. Therefore, it is considered that it does not fall within section 182A of the PDA and should not be deemed to be strategic infrastructure development.
- In accordance with the definition of transmission in Section 2(1) of the Electricity Regulation Act 1999 it is for ESB and the CRU to specify which

lines and associated substations form part of the distribution system and not An Coimisiún Pleanála.

- The ESB have designated the line and substation as part of the distribution system and for that reason the proposal does not fall within the scope of S.182A of the Planning and Development Act 2000 as amended.

5 Relevant Precedents

As referenced above the prospective applicant cites a 2023 case ref: 316225 where the Bord determined that the development of a substation did not comprise SID under s182A. That case, and other more recent cases which I consider of greater relevance include the following:

ABP Ref. No.	Location	Development Description	Decision Date	Decision
323975	Laois	Proposed development of a new distribution 110kV/38kV (medium voltage) substation at a site in the IDA Business and Technology Park	March 2026	Is SID
323974	Cork	Proposed development of a 110/20 KV substation and ancillary works	March 2026	Is SID
323959	Cork	The proposed development consists of a distribution 110kV/38kV/MV substation	March 2026	Is SID
322700	Dublin	Proposed installation of a new 110/38kV/MV station	Feb 2026	Is SID
323789	Dublin	New 110/38kV/MV Station & All Associated work	January 2026	Is SID
321687	Limerick	Installation of a New 110/38kV/MV Station & All Associated work.	March 2025	Is SID
320535	Meath	Proposed development of a new 110kV/38kV/MV substation on a site located approximately 3km west of Hansfield Rail station	Oct 2024	Is SID
319735	Meath	Installation of a new 110kV / 38kV/MV distribution on a 1.64ha site north of the Drogheda IDA Business and Tech Park.	August 2024	Is SID

317654	Meath	Proposed development of 110kV/MV distribution station.	Oct 2023	Is SID
316225	Dublin	Proposed installation of a new 110kV/MV station	June 2023	Not SID

6 Legislative provisions

6.1 Planning and Development Act 2000, as amended

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)"

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.

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."*

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

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

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 Consultation Meeting

A meeting was not held in respect of this case. A written record of the consultations undertaken have been attached to the file.

8 Assessment

The core of the case made by the prospective applicant is that

- The proposal will form part of the distribution network and not the transmission network.
- The 110kV threshold in S 182(9) relates to a high voltage line, no voltage threshold is prescribed for substations.

For that reason, the prospective applicant is of the view the substation should not be considered Strategic Infrastructure.

8.1 Distribution vs Transmission.

Section 2(1) of the PDA defines ‘strategic infrastructure’ as including any proposed development referred to in section 182A(1) which describes development comprising or for the purposes of electricity transmission.

The definition of transmission set out in Section 182A(9) of the PDA incorporates and is broader than, that contained in the Electricity Act.

Section 182A(9) references the definition in the Electricity Regulation Act, followed by the word ‘but’, continuing to set out that ‘transmission’, for the purposes of the

section, shall 'also' be construed as meaning the transport of electricity by means of a line where the voltage would be 110kV or more.

The Planning Act thereby incorporates and extends the definition of transmission beyond the electricity regulation definition as opposed to being limited by it.

As noted by the prospective applicant The Electricity Regulation Act 1999 sets out a differentiation between distribution and transmission and assigns a role to the ESB and the CRU in that regard. However, no definition is provided for distribution or distinction between it and transmission in the Planning Act. Transmission for the purpose of the Planning Act simply relates to the transport of electricity where the voltage would be equal to or more than 110kV.

It is therefore possible that a proposed development could comprise 'transmission' under the provisions of the Planning Act but not comprise 'transmission' under the provisions of the Electricity Act.

Categorisation and definition of the proposed development in the context of the provisions of section 182A of the Planning Act, is the purpose and key determinant in this case.

The proposed substation is to be connected, via two new Line-Cable Interface Masts (LCIMs) and approximately 2km of new underground 110kV cable diverting the Finglas – Stephenstown 110kv line, to the proposed substation to transport high voltage electricity via a 'loop in/loop out' connection.

8.2 Voltage threshold for substations

Section 182A(1) relates to development comprising or for the purposes of electricity transmission. The Electricity Regulation Act definition of transmission set out in section 6.2 above is incorporated into the Planning Act definition of transmission by virtue of 182(9) as described above.

I consider in that development for transmission of electricity is inclusive of substations, poles, pylons, switchgear, transformers and any other ancillary or associated development.

For these reasons the case that an absence of reference to a voltage threshold for substations in section 182 of the PDA the Planning Act makes all substations not Strategic Infrastructure for the purpose of the Planning Act is rejected.

8.3 Precedent and Other Matters

Whilst I note that the proposed substation is to contain apparatus operating at voltages below 110kV I consider these elements to be interconnected with and integral to the 110kV infrastructure and accordingly, should also be considered within any future application.

The case ref: 316225 referenced in the application, determined in 2023 included consideration of Section 37A(2) of the Planning Act and concluded that the substation in that instance was not of strategic importance and therefore not SID. Reference is made in that case to precedents relating to BESS and Synchronous compensators which are not relevant to the subject case. While the conclusions and determinations reached by the Board in that case are fully acknowledged, An Coimisiún should note that this is an older case and not directly comparable to the subject development.

In more recent cases determined by An Coimisiún as set out in section 5 above, there is unanimity and consistency that 110kV substations fall within the scope of transmission and therefore fall within the scope of section 182A of the Planning Act.

I note that the subject site is subject to a green belt zoning objective and is also centred on the alignment of a mapped roads proposal in the operative Development Plan. Notwithstanding the narrow scope and procedural function of this report, given the strategic importance of the proposal and in the interest of expediency careful consideration of these and other spatial policies should accompany any application for approval arising. A site selection criteria/sequential test type justification demonstrating elimination of alternative sites may assist ACP in assessing compliance with spatial policy.

8.4 Conclusion

I consider that the reference in section 182A of the Planning Act to 'development comprising or for the purposes of electricity transmission' relates to a broader planning definition of transmission as *transport of electricity by means of high voltage line where the voltage would be 110 kilovolts or more* incorporating the electricity act definitions including definitions of electricity line and electricity plant therein. On this basis I am satisfied that the proposed development entails the transport of electricity by means of 110kV high voltage lines.

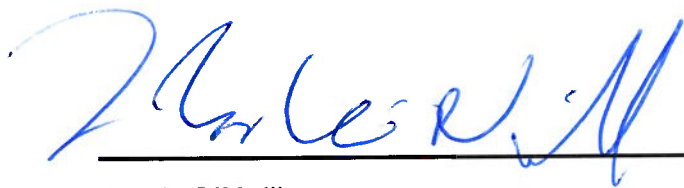
A list of prescribed bodies is set out in Appendix 1.

9. Recommendation

I recommend that the prospective applicant, Electricity Supply Board (ESB), be informed that:

The proposed Ridgewood 110V/MV Gas Insulated Switchgear (GIS) electrical substation on lands in the townland of Forrest Great, Swords, Co. Dublin to which the Finglas – Stephenstown 110 kV line is to diverted, as set out in the plans and particulars received by An Coimisiún Pleanála on the 18th June 2026 falls within the scope of section 182A of the Planning and Development Act 2000, as amended, and a planning application should therefore be made directly to An 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 me, directly or indirectly, following my professional assessment and recommendation set out in my report in an improper or inappropriate way.



Hugh O'Neill

Planning Inspector

Date: 25 August 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*
- *Fingal County 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.