An Coimisiún Pleanála

Inspector's Report ACP-324451-26

Development	Proposed development of a 110kV/10kV Primary Substation
Location	Lands at Dublin Airport, 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	Dublin Airport Authority PLC
Inspector	Barry O'Donnell

1.0 Introduction

1.1. The Commission received a request on 7th March 2026 from Dublin Airport Authority PLC to enter into pre-application consultations under Section 182E of the Planning and Development Act 2000, as amended, in relation to proposed development of a 110kV/10kv substation on the north and south sides of Old Airport Road, Swords, Co. Dublin.

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 29th September 2026. A record of the meeting is on file. A letter requesting closure of the consultation process was received on 20th October 2026.

2.0 Site Location and Description

2.1. The subject site comprises two separate land parcels, on the north and south sides of Old Airport Road, Swords, Co. Dublin. The site is located toward the east end of Old Airport Road, near the junction with the R132 Swords Road.

2.2. Both land parcels are currently greenfield in nature. The parcel on the north side of Old Airport Road is 'airside' and is contained behind both airport security fencing and an internal road that routes around the Airport perimeter. The parcel on the south side of the road is contained behind mature hedging. It is also contained behind security fencing and was inaccessible at the time of inspection.

3.0 Proposed Development

3.1. The accompanying pre-application site layout drawing depicts the proposed development and layout, identifying elements on both the north and south sides of Old Airport Road.

3.2. The proposed substation building is located on the southern parcel and it will be connected to a proposed transformer and switch room on the northern parcel, via an

underground cable. According to the site layout drawing, separate ESB compounds would be provided for both the substation and transformer/switch room parcels

3.3. The site layout drawing also indicates the construction of a BESS on the northern parcel, however; the Prospective Applicant confirmed at the pre-application consultation meeting that this no longer forms part of the proposal.

3.4. The accompanying cover letter states that the split site arrangement provides an optimal balance between security and accessibility, compared to a fully landside or airside solution.

4.0 Prospective Applicant's Case

4.1. The Prospective Applicant summarises relevant provisions within both the Planning and Development Act, 2000, as amended and the Electricity Regulation Act, 1999 and offers the view that the proposed development does not constitute Strategic Infrastructure Development for the following reasons: -

- The development will serve the Airport's needs only and will not serve other development or lands in the vicinity.
- The development will effectively constitute the end of the network and will not add to network capacity. It will not form part of the transmission network.
- The development will not form a node on the transmission network.
- The development is not of strategic importance to the state, would not contribute to the fulfilment of any objectives of the NPF or RSES.

5.0 Relevant Planning History

5.1. **ABP-320815-24:** Permission granted on 16th June 2026 to Dublin Airport Authority for upgrades to and construction of additional surface water drainage infrastructure at Dublin Airport.

5.2. **ABP-312131-21:** Permission granted on 9th July 2025 to Uisce Eireann for construction of the Greater Dublin Drainage Project, consisting of a new wastewater treatment plant, sludge hub centre, orbital sewer, outfall pipeline and regional biosolids storage facility

5.3. **Nearby Planning Records**

5.4. **ABP-317831-23:** Permission granted on 26th June 2026 to the ESB for the development of 3 No. 110kV electricity circuits intended to serve the MetroLink project.

6.0 Relevant Precedents

6.1. There are a large number of pre-application directions pertaining to substation and grid connection infrastructure proposals that are of relevance to this pre-application proposal. These include: -

ABP Ref. No.	Location	Development Description	Decision Date	Decision
ACP-324084-26	Co. Dublin	110kV substation	2/10/26	Is SID
ACP-324202-26	Co. Galway	110kV substation	28/9/26	Is SID
ACP-324402-26	Co. Meath	110kV substation and loop-in connection to 110kV overhead lines	28/9/26	Is SID
ACP-324418-26	Co. Dublin	110/38kV distribution substation	21/9/26	Is SID
ACP-324454-26	Co. Galway	110kV substation and grid connection	3/9/26	Is SID
ACP-324386-26	Co. Dublin	110kV GIS substation	26/8/26	Is SID
ACP-324124-26	Co. Offaly	220kV loop-in substation	20/7/26	Is SID
ACP-323974-25	Co. Cork	110/20kV substation and ancillary works	11/3/26	Is SID
ACP-323959-25	Co. Cork	110/38kV substation	11/3/26	Is SID
ACP-323874-25	Co. Galway	220kV substation and grid connection	3/2/26	Is SID
ACP-323627-25	Co. Tipperary	110kV GIS substation and grid connection	23/1/26	Is SID
ACP-323167-25	Co. Kerry	110kV AIS substation and grid connection	8/1/26	Is SID

7.0 Legislative Provisions

7.1. Planning and Development Act, 2000, as amended

7.1.1. 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)"

7.1.2. 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.

7.1.3. 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."

7.1.4. 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.

7.2. Electricity Regulation Act 1999, as amended

7.2.1. 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

  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".

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. The proposed development comprises a 110kV/10kv substation on the north and south sides of Old Airport Road, Swords, Co. Dublin and the Prospective Applicant is seeking a determination from the Commission as to whether the substation development is or is not SID. In arguing that the development does not constitute SID, the Prospective Applicant states that the development will serve the Airport's needs only and that it will effectively constitute the end of the network and will not add to network capacity.

8.3. Under Section 182A of the Planning and Development Act, 2000 (as amended), an undertaker shall apply to the Commission for approval of a development comprising or for the purposes of energy transmission. Section 182A (9) sets a threshold of 110kV, in order for a high-voltage transmission line to be considered SID, for its

purposes. The Act does not provide a threshold for a substation, however; the Commission will note that the subject proposal includes 110kV infrastructure. I consider the proposed substation falls within the definition of transmission, in accordance with Section 2(1) of the Electricity Regulation Act, 1999.

8.4. A detailed discussion took place at the pre-application consultation meeting regarding the operational characteristics of the development and with a focus on the Prospective Applicant's statement within the supporting cover letter that the development will be for Airport usage only. As part of this discussion the Prospective Applicant clarified that the infrastructure on the south side of Old Airport Road (i.e. the substation building) will be owned and operated by the ESB and that the infrastructure on the north side of Old Airport Road (i.e. the transformer and switch room) will be owned and operated by DAA. The infrastructure on the north side of Old Airport Road will not be available to other parties for connection or distribution.

8.5. As the substation component will be owned and operated by the ESB, it will be capable of accommodating additional connections in the future and, thus, operating as a node on the network.

8.6. By reference to the precedent cases outlined at Section 6, the Commission has consistently determined that 110kV substations fall within the definition of Strategic Infrastructure Development. Recent examples of the Commission's determinations on this type of infrastructure include ACP-324084-26 and ACP-324202-26. I consider these cases are directly related to the current proposal and there is nothing within this pre-application submission that would lead me to take a different view of the current proposed development.

8.7. In conclusion, having regard to the nature and scale of the proposed development, I am of the opinion that the proposal falls within the scope of Section 182A of the Act and constitutes Strategic Infrastructure Development.

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

9.0 Recommendation

9.1. I recommend that the Prospective Applicant, Dublin Airport Authority PLC, be informed that the proposed development of a 110/10kV substation on lands at Old

Airport Road, Swords, Co. Dublin, as set out in the plans and particulars received by An Bord Pleanála on 7th March 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.

Barry O'Donnell
Senior Planning Inspector

2nd November 2026.

Appendix 1 – Prescribed Bodies

The following is a list of prescribed bodies considered by the Commission to be relevant to the proposed development: -

- Minister for Housing, Local Government and Heritage.
- Minister for Environment, Climate and Communications.
- Commission for Regulation of Utilities.
- Fingal County Council
- The Heritage Council
- ESB
- Eirgrid
- An Taisce
- Uisce Eireann
- Transport Infrastructure Ireland

Further notifications should be made where deemed appropriate.