



An
Bord
Pleanála

Inspector's Report Strategic Infrastructure pre application consultation 61.VC0110.

Development

New 110kV gas insulated switchgear (GIS) building within existing Galway 110kV electricity sub station compound, new line/cable interface masts, alterations to existing site entrance and associated works.

Location

Galway 110kV Sub station, Ballybrit, Galway City, Co. Galway.

Planning Authority

Galway City Council.

Prospective Applicant(s)

EirGrid plc.

Type of Request

Section 182E request for SID Pre-application consultation – whether project is or is not strategic infrastructure development.

Inspector

Philip Green.

1.0 Proposed Development

1.1. EirGrid plc. propose

- to construct a new 110kV GIS building to the south of the existing sub station within the existing sub station site compound. This is located in Ballybrit just off the N6 (location and aerial maps and photograph provided). Details of the proposed location of the new GIS building along with a photograph of a typical GIS structure (stated as measuring approx. 15m. high and with footprint of 50m. x 14m.) are provided with the request.
- Replacement of three end towers (transferring overhead line circuits to the busbar) with three line/cable interface masts which will transfer the overhead line circuits to underground cables. Typical mast heights are stated as 21m. high (typical plans and elevations provided).
- Alterations to existing site entrance (further detail to be developed)
- Associated works include realignment of fence and cabling between the new line/cable interface masts and the new GIS substation.
- The existing AIS substation will be decommissioned following completion and energisation of the GIS building although given uncertainty of timing and importance of ensuring security of supply this does not form part of the proposed development and will be addressed by way of separate application although considered as part of overall environmental impacts in the planning application.
- It is stated that neither EIA or AA is required for the proposed works (screening assessments for such will be provided with the application).

- 1.2. EirGrid indicate that the Galway 110kV substation is an important transmission and distribution node supplying electricity to the City and western region (plan showing station within 110 and 220k V transmission networks provided).
- 1.3. Approximately 300MW of wind energy will connect to the west of the Galway substation under Gate 3 offers. This will ultimately be connected to the wider transmission grid network via Galway. Important that supply maintained to Galway and surrounds and to minimise risk the existing AIS will be left operational and GIS building built to the south. This type of infrastructure previously proposed at redevelopment of Moneypoint 400kV substation (VC0055) and Ardnacrusha (VC0061 redevelopment of 110kV substation).
- 1.4. GIS building will result in an overall lesser substation footprint and following completion of the GIS building existing circuits will be transferred from the AIS station on a phased basis and equipment decommissioned and removed.
- 1.5. Development will ensure substation remains a robust node on network contributing to strengthening overall meshed grid and providing a more secure and reliable system for inward investment and to transmit energy to local centres throughout the region and the country.
- 1.6. Examining all practical options and optimising existing substations is in accordance with EirGrid's recently published 'Ireland's Grid Development Strategy' key pillars Nos 2 & 3.

2.0 Applicant's case

- 2.1. Development not considered to be strategic infrastructure given:
 - While of considerable benefit to the network from a technical perspective from a planning perspective the development is essentially an enhancement of existing substation infrastructure predicated by wind generation onto the network;
 - Nature, function scale and fact that it is primarily required to connect wind it is not of itself of strategic importance to the State. Nor does it meet any other provisions for SID set out in Section 37A(2) of the Act.

- Notes Board previous decisions in respect of VC0040 (development of new GIS substation building at Finglas 220kV substation), VC0101 (new GIS substation at Inchicore 220kV substation) as well as VC0055 and VC0061 referred to previously all of which were not deemed SI;

3.0 Legal Provisions

3.1. Under section 182A(1) of the 2000 Act (inserted by section 4 of the 2006 Act) where a person (thereafter referred to 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 development under section 182B and shall apply to the Board for such approval accordingly.

Subsection 9 states that

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.

In section 2(1) of the Electricity Regulation Act, 1999, “transmission” is defined in relation to electricity as meaning

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.

4.0 Assessment

- 4.1. The Board will note previous decisions it has made on SI pre application consultation requests in relation to electricity transmission infrastructure under S.182E and involving amendments, additions and expansion of electricity substation infrastructure (including those cases referred to by the prospective applicants). In these cases due to lack of clarity in the interpretation of s.182A and its requirements in regard to developments of such a nature the Board has exercised some discretion and used the broad definition of the SI Act, “developments of strategic importance to the State”, and the criteria contained in s.37(A)(2) to determine such matters (although not specifically cited in regard to cases coming forward under s. 182A).
- 4.2. Whilst in this case a new GIS substation building and ancillary works are being proposed this is within the context of the existing substation infrastructure. A need, precedent and role for the presence of a substation in the location is well established. The stated purpose for the proposed works including connection of significant amounts of wind energy generated in the region to the national grid and to serve the local area securely might be considered of some strategic importance. In addition, the Board should also note the clear statement in EirGrid’s new Grid Development Strategy to optimise the existing grid which puts the upgrading of such facilities clearly in a more strategic planning context.
- 4.3. Notwithstanding the above and noting the nature and scale of the proposed development and its location broadly within the existing site compound I consider that the proposed development as described in the submissions and drawings, and having regard to the stated purpose of the 2006 Act as set out in the long title and to the general description and scale of strategic infrastructure development set out in section 37A(2) would not constitute strategic infrastructure. I conclude that the proposed development consisting of a new 110kV gas insulated switchgear (GIS)

building within the existing Galway 110kV electricity sub station site compound, new line/cable interface masts, alterations to existing site entrance and associated works at Galway 110kV Sub Station, Ballybrit, Galway City, Co. Galway does not fall within the scope of section 182A of the Planning and Development Act 2000, as amended necessitating an application direct to the Board.

5.0 Recommendation

- 5.1. I recommend that EirGrid plc. be informed that the proposed development consisting of a new 110kV gas insulated switchgear (GIS) building within the existing Galway 110kV electricity sub station site compound, new line/cable interface masts, alterations to existing site entrance and associated works at Galway 110kV Sub Station, Ballybrit, Galway City, Co. Galway as set out in the plans and particulars received by An Bord Pleanala on the 21st August 2017 does not fall within the scope of section 182A of the Planning and Development Act 2000, as amended, and that a planning application should be made in the first instance to Galway City Council.

Philip Green
Assistant Director of Planning

31st October 2017