The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
DO1 V902

3rd July, 2026

RE: 7th Schedule pre-application consultation in respect of the proposed new 110kV/10kV Primary Substation at Dublin Airport, Swords, Co. Dublin

Applicant: daa plc
Planning Authority: Fingal County Council

We, Coakley O'Neill Town Planning Ltd, NSC Campus, Mahon, Cork, are instructed by daa plc, c/o AtkinsRéalis, Atkins House, 150 Airside Business Park Swords, Co Dublin, K67K5W4 to submit this pre-application consultation request under S182E of the Planning and Development Act, 2000, as amended, in respect of the proposed new HV/MV GIS Substation on a site of 5.67ha to the north and south of the Old Airport Road, south of the main Airport campus at Dublin Airport, Swords, Co. Dublin.

The proposed development will ensure a safe, secure and reliable supply, and storage, of electricity for Dublin Airport, and forms a key element of daa's MV Expansion and Resilience Programme, supporting both existing operational demand and forecast future growth at the Airport.

Nature and Extent

As generally illustrated in Plate 1, the proposed new HV/MV 110kV/10kV GIS Substation will generally consist of:

- Site to the north of the Old Airport Road, within the Airport campus:
    - Proposed Switch Building with fire wall, part 5.5m in height, and 11.9m in height to ridge level
    - Transformer c. 5.2m in height
    - 20MVA/40MWhr BESS
    - Entrance gate and compound fencing
    - Internal roads, drainage, car parking and cycle parking

- To the south of the Old Airport Road:
    - Proposed single-storey HV substation c. 11.9m in height
    - Compound fence and access gates
    - Internal roads, drainage, car parking, cycle parking, and landscaping

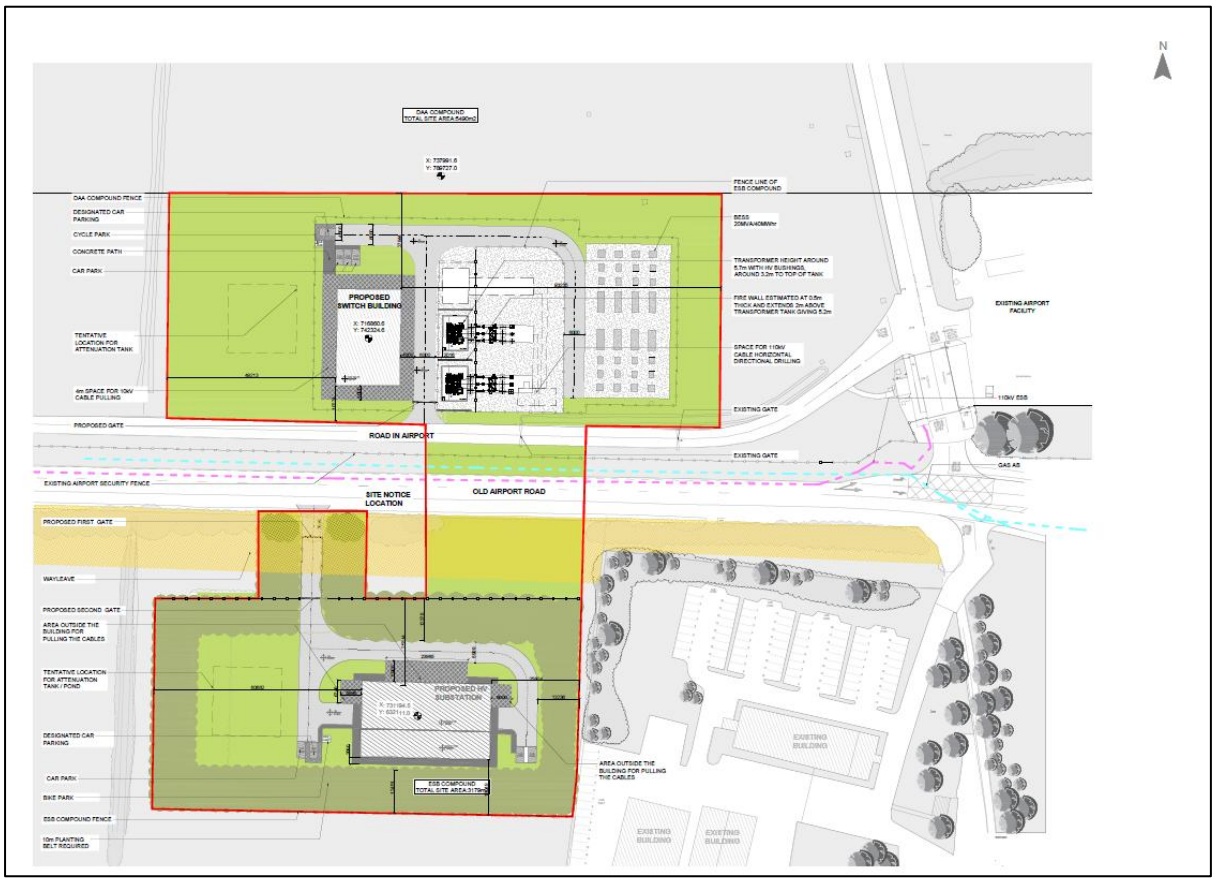


Plate 1: Proposed Site Layout Plan

The split-site arrangement provides an optimal balance between security and accessibility compared to a fully landside (or airside) solution.

Policy Context

That part of the site located to the north of the Old Airport Road is zoned DA (Dublin Airport) in the Fingal County Development Plan 2023 which supports airport-related infrastructure, including Utility Installations. That part of the site located to the south of the Old Airport Road is zoned GE (General Employment). Utility Installations are permitted in principle on GE zoned land.

The proposed development site is located within Noise Zone A. Old Airport Road forms part of the proposed Greater Dublin Area Cycle Network Plan.

In relation to utility structures, the following objectives of the Fingal County Development Plan 2023-2029, with which the proposed development is aligned, are of note:

- Objective DMSO17 – Location of New Utility Structures: Where possible, new utility structures such as electricity substations and telecommunication equipment cabinets, should not be located adjacent to or forward of the front line of buildings or on areas of open space.
- Objective DMSO18 – High Quality Design of New Utility Structures: Require new utility structures such as electricity substations and telecommunication equipment cabinets to be of high-quality design and to be maintained to a high standard by the relevant service provider.

Legislative Context

Section 3(1) of the current Planning and Development Act, 2000, as amended, (hereafter referred to as the Act, unless otherwise stated) states that:

> *"Development in this Act means, except where the context otherwise requires, the carrying out of any works on, in, over or under land or the making of any material change in use of any structures or other land".*

Section 182A(1) of the Act states that where a person (the "undertaker") intends to carry out "development comprising or for the purposes of electricity transmission", an application for approval of the development under section 182B shall be made to An Coimisiún Pleanála (ACP).

Under Section 182A(9) of the Act, '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 high voltage line where the voltage would be 100 kilovolts or more, or
- an interconnector, whether ownership of the interconnector will be vested in the undertake or not.

Section 2(1) of the Electricity Regulation Act 1999 states as follows:

"transmission", in relation to electricity, means 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 [Electricity Supply 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 [Electricity Supply Board]".

With regard to the above, the proposed development comprises development for the purposes of electricity transmission as defined in Section 182A(9) of the Act.

Furthermore, Electric plant is defined in the Electricity Regulation Act 1999 as follows:

- *any plant, apparatus or appliance used for, or for purposes connected with, the generation, transmission, distribution or supply of electricity, other than –*
    - *an electric line,*
    - *a meter used for ascertaining the quantity of electricity supplied to any premises, or*
    - *an electrical appliance under the control of the consumer.*

It is considered that the proposed substation constitutes electrical plant.

In this regard, pre-application consultation with An Coimisiún Pleanála is required under Section 182E of the Planning and Development Act, 2000, as amended, to determine if the proposed development constitutes Strategic Infrastructure Development (SID).

Considerations

However, it is considered that the proposed development does not constitute SID for the following reasons:

- The proposed development is to serve the Airport's needs only, and will not serve any other lands or development in the vicinity.
- It will effectively constitute the end of the network and will be taking from, and not adding to, network capacity. It will not form part of the transmission network.
- It will also not form a node on the transmission network.
- Given its nature, function and scale it is not, of itself, of strategic economic importance to the State, would not contribute substantially to the fulfilment of any of the objectives in the National Planning Framework or the current Regional Planning Guidelines for the Eastern and Midlands region, and are within the catchment of a single planning authority.

Please find enclosed a Site Location Map, Proposed Site Layout Plan, Proposed Floor Plans, and Proposed Elevations. The prescribed fee of €4,500 has been paid via EFT (Reference Number: 7149319).

We do not envisage that a meeting with the Commission is required.

Yours sincerely

Ad oNeill

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Aiden O'Neill
Director
Coakley O'Neill Town Planning Ltd