

# **Planning Report for a Strategic Infrastructure Development**

**In respect of**

**Proposed Underground Double Circuit 110kv Transmission  
Line from Darndale Substation to Belcamp Substation**

**Prepared by**

**John Spain Associates**

**On behalf of**

**Amazon Data Services Ireland Ltd. (ADSIL)**

**February 2019**



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**1.0 INTRODUCTION AND CONTEXT**

- 1.1 On behalf the applicant, Amazon Data Services Ireland Ltd. (ADSIL), and further to a determination received from An Bord Pleanála confirming the proposed development constitutes Strategic Infrastructure Development (SID) pursuant to Section 182A of the Planning and Development Act 2000, as amended (hereinafter referred to as 'the Act'), we hereby submit this planning application in respect of the provision of a double circuit 110kV underground transmission line between the Belcamp 220kV and 110 kV Substation (permitted under ABP Ref.: VA0014) located to the north of the R139 and the Darndale 110kV Substation (permitted under DCC Reg. Ref.: 3288/16 & Reg. Ref.: 3874/15) located at the former Diamond Innovations Site, Clonshaugh Business and Technology Park, Dublin 17.
- 1.2 An Environmental Impact Assessment Report (EIAR) has been prepared by AWN Consulting Limited and other EIA contributors and accompanies this SID planning application submitted to An Bord Pleanála.
- 1.3 This planning application relates to the provision of an underground double circuit 110kV transmission line from the Belcamp 220kV and 110kV Substation to the Darndale 110kV Substation. This project is designed to support current power demand and future growth within the Clonshaugh area inclusive but not limited to the power requirements for the existing and future developments within the ADSIL site. The proposed route for the underground double circuit 110kV transmission line is discussed at Section 5.0 and illustrated in the accompanying drawings. The route alignment has been the subject of discussions and agreement with the relevant landowners / planning authorities prior to lodgement (see letters of consent).
- 1.4 The main stakeholders for the development are as follows;
- EirGrid, is responsible for operating and developing the national high voltage electricity grid in Ireland;
  - ESB Networks, (Asset Owner) is responsible for carrying out maintenance, repairs and where works are not contestable, the construction of the national high voltage electricity grid in Ireland;
  - ADSIL's role for this project is to act as the Developer/Applicant.

***Development Method***

- 1.5 The development of the Darndale Substation will be a contestable development. The meaning of this, is that the Developer will be responsible for the design, construction, fit-out and pre-commissioning of both the Darndale 110kV Substation and the underground double circuit 110kV transmission line to the existing Belcamp 220kV and 110kV Substation.
- 1.6 Upon completion of the works by the Developer, the Darndale 110kV Substation and underground double circuit 110kV transmission line will be handed over to EirGrid, whom in conjunction with ESB Networks will carry out the final commissioning and energisation of the Darndale 110kV Substation and the underground double circuit 110kV transmission line.
- 1.7 Once energised, the Darndale 110kV Substation and underground double circuit 110kV transmission line will form part of ESB Networks infrastructure, which EirGrid will be responsible for operating.

***Applicant***

- 1.8 The Applicant (Developer) for the proposed contestable development is Amazon Data Services Ireland Ltd. (ADSIL), with a registered address at One Burlington Plaza, Burlington Road, Dublin 4.
- 1.9 The Applicant is the owner and operator of the Data Storage Facilities at Clonshaugh Business and Technology Park, within which the permitted Darndale Substation compound is located. Please refer to the site location map submitted herewith for the outline of relevant land in the ownership of the Applicant.

**2.0 SITE LOCATION AND CONTEXT**

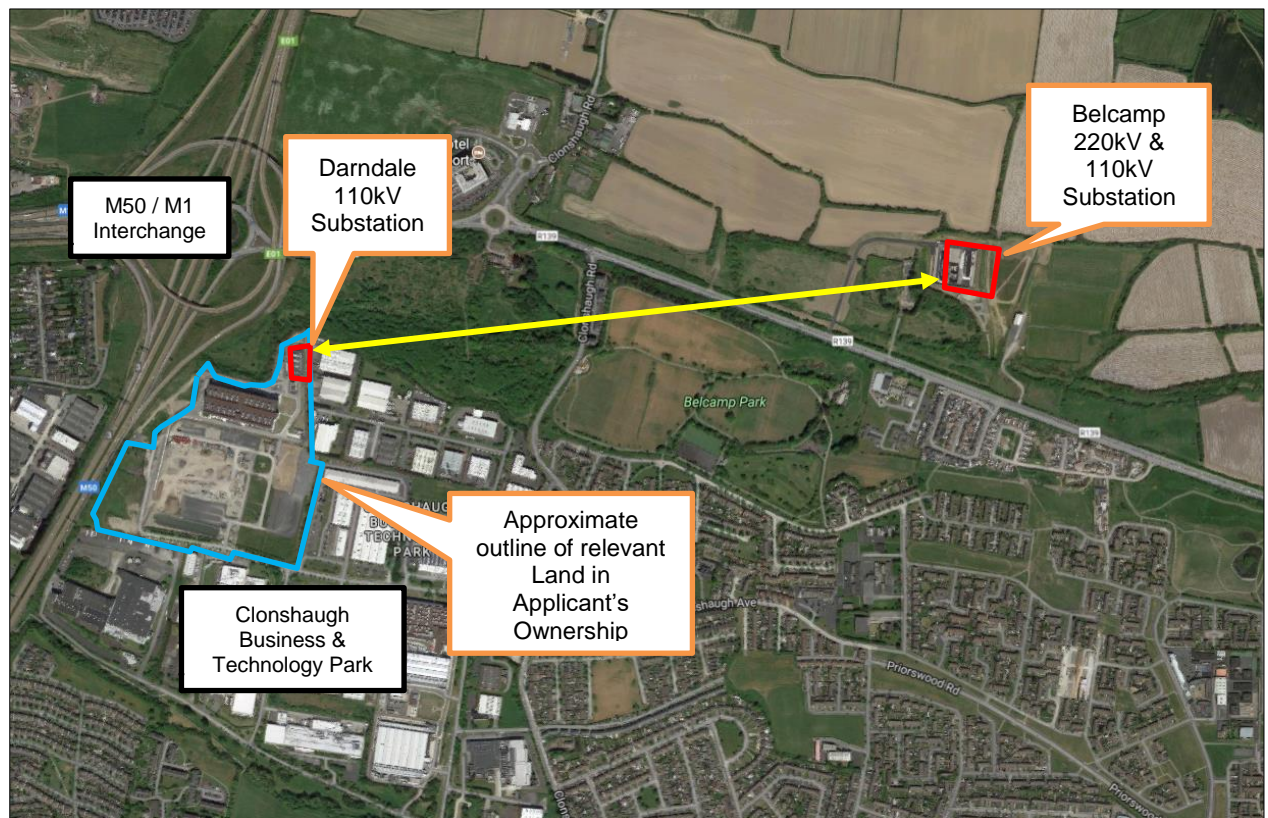
- 2.1 The proposed development comprises the provision of an underground double circuit 110kV transmission line, linking 2 no. substations; the Darndale 110kV Substation located at the former Diamond Innovations Site, Clonshaugh Business and Technology Park, Dublin 17, and the Belcamp 220kV / 110kV Substation which is located to the north of the R139. The approximate distance between the two Substations via the proposed transmission line route is c. 2km.
- 2.2 The Belcamp 220kV and 110kV Substation project was permitted by An Bord Pleanála (ABP) under ABP Ref.: VA0014 (Belcamp and Clonshaugh, County Dublin) (S. 182E Pre-Application Reference VC0058) on the 12<sup>th</sup> of February 2013.
- 2.3 The Darndale 110kV Substation was permitted by Dublin City Council (DCC) as part of a larger development at Clonshaugh Business and Technology Park under DCC Reg. Ref.: 3288/16, which was an amendment of DCC Reg. Ref.: 3874/15 (see Section 4 for Planning History).

**Darndale Substation**

- 2.4 The Darndale 110kV Substation is located within an existing / permitted complex of Data Storage Facilities which are located within the Clonshaugh Business and Technology Park, adjacent to the M50 and M1 interchange.
- 2.5 The substation location is bounded to the north and west by greenfield lands providing a buffer between the business park and the motorway interchange, which is located c. 100 metres to the northwest. The Darndale 110kV Substation is bounded to the south by ADSIL's Data Storage Facilities, and to the east by other industrial / employment related buildings.
- 2.6 The Clonshaugh Business and Technology Park accommodates a range of technology and industrial type uses and is highly accessible having regard to its location adjacent to the M50 / M1 interchange. To the northeast of the Business Park is Belcamp Park, a significant area of public open space which includes playing fields, recreational facilities and extensive areas of managed grassland.

**Belcamp Substation**

- 2.7 The Belcamp 220kV and 110kV Substation is located to the north of the R139 and is bounded on all sides by green-field lands zoned for high technology uses under the current Fingal County Development Plan (2017-2023).
- 2.8 The Substation is accessed via a roadway branching from the R139.



**Figure 1: Location and Context of the Darndale 110kV and Belcamp 220kV and 110kV Substations**

- 2.9 The proposed Darndale to Belcamp 110kV transmission cable installation will be designed to support current power demand and future growth within the Clonshaugh area inclusive but not limited to the power requirements for the existing, proposed and possible future development within the data storage facility and indicative future plan for the former Diamond Innovations site (Unit 1C), Clonshaugh Business & Technology Park and adjacent lands.
- 2.10 The project is required to provide necessary infrastructure between the Belcamp Substation and Darndale Substation.

### 3.0 PRE – APPLICATION CONSULTATIONS

- 3.1 The applicant has had 3 no. pre-application consultation meetings with An Bord Pleanála on the 27/03/2018, 31/05/2018 and the 24/08/18, in response to a pre-application consultation request received by An Bord Pleanála on the 29<sup>th</sup> of January 2018.
- 3.2 The purpose of the first consultation meeting was to provide further information to An Bord Pleanála to inform their determination as to whether or not the proposed development might constitute strategic infrastructure.
- 3.3 The applicant presented further detail on the proposed development, including a preferred route option (Option 2). The applicant confirmed that the proposed transmission line would not involve any overhead elements.
- 3.4 In the second consultation meeting the applicant advised that the preferred route option (Option 2) which follows the public road network had been developed further. The applicant noted both Fingal County Council and Dublin City Council as the

relevant local authorities, as the proposed development traverses both local authority areas.

- 3.5 The Board advised that if EirGrid are of the opinion that the proposed development comprises transmission then it is likely that it would fall within the definition of electricity infrastructure under Section 182A. The Board concluded that it will undertake consultation with EirGrid to inform their determination and would revert to the applicant having obtained the views of EirGrid.
- 3.6 Consultation has also been undertaken with the planned operator ESB Networks to ensure the project design meets their requirements.
- 3.7 In addition, the relevant specialists and project engineers (CSEA) have liaised with typical statutory bodies (including Irish Water, FCC and DCC, EirGrid, ESB, NPWS etc.) by correspondence during the course of the EIA Report preparation.
- 3.8 A third and final pre-application meeting was facilitated following correspondence from EirGrid to An Bord Pleanála. The Board outlined the procedures to be followed as part of the application process following the issuing of a determination.

#### **An Bord Pleanála Determination**

- 3.9 An Bord Pleanála have confirmed in a letter dated the 14<sup>th</sup> of January 2019 that the proposed development constitutes Strategic Infrastructure within the meaning of section 182A of the Act.
- 3.10 Therefore, the current application is required to be submitted directly to An Bord Pleanála under section 182A(1) of the Act.
- 3.11 The determination from the Board that the development constitutes a SID was accompanied by two Inspector's reports, comprising an initial report and an addendum report.

#### **4.0 RELEVANT PLANNING HISTORY**

##### **Darndale Substation & Former Diamond Innovations Site, Clonshaugh Business and Technology Park**

###### *4.1 Dublin City Council Reg. Ref.: 3288/16*

A final grant of permission was issued on the 26<sup>th</sup> of September 2016 for the following development:

*"Amendments to a previously issued Planning Permission (Reg. Ref. No. 3874/15), including:*

- (1) The construction of a new two storey substation building, area 690 sq.m;*
- (2) The addition of a transformer bay and associated fire wall to the transformer compound and reorientation of the compound on a north-south axis;*
- (3) The enlargement of the single storey client control building by 30 sq. m and its relocation to the north end of the compound;*
- (4) The consequent rearrangement of the compound access road and fencing"*

The above amendment permission, and the parent permission below, is the relevant permission for the Darndale 110kV Substation at the northern edge of Clonshaugh Business and Technology Park.

4.2 *Dublin City Council Reg. Ref. 3874/15*

On the 29<sup>th</sup> of January 2016, permission was granted for the following development:

*“(1) The construction of a new two-storey c.16,700 sq.m building for use as electrical rooms for electronic operations, mechanical plant rooms and support areas including offices and welfare facilities, a loading bay, back-up generators and a water tank farm. The facility will also contain new external plant areas including  
(2) An electrical substation;  
(3) and electrical transformer compound with associated control room;  
(4) A diesel fuel tank farm and loading bay with associated pump house; and  
(5) A sprinkler water tank with associated pump house;  
(6) A security entrance kiosk;  
(7) The repositioning and widening of 2 no. vehicular and pedestrian entrances;  
(8) 36 no. car parking spaces, boundary railings/fencing, landscaping and  
(9) Ancillary works”*

This application was accompanied by an Environmental Impact Assessment (EIA) Screening Report. An Environmental Impact Statement (EIS) was not required for this development as it was below the mandatory threshold of 15 ha for industrial developments. As evidenced from the development description above this included the Darndale 110kV Substation.

4.3 *Dublin City Council Reg. Ref.: 3634/15*

On the 13<sup>th</sup> of January 2016, a final grant of permission was issued for the demolition of the existing industrial buildings and ancillary structures on the site.

4.4 *Dublin City Council Reg. Ref.: 4449/16*

On the 6<sup>th</sup> of April 2017 Dublin City Council issued a final grant of permission for the construction of a new single-storey c.14,107 sq. m. building for use as electrical rooms for electronic operations, mechanical plant rooms and support areas including offices and welfare facilities, a loading bay, back-up generators and a water tank farm. The development also included the provision of 30 parking spaces, the relocation of an existing attenuation area, landscaping and the acoustic screening of an existing transformer compound.

An EIS was submitted with this application as the development related to an overall industrial site with an area of c. 15 ha in total.

The grant of permission by Dublin City Council was subject to 14 no. conditions.

4.5 *Dublin City Council Reg. Ref.: 3599/16*

On the 23<sup>rd</sup> of November 2016, permission was granted for the addition of a *“regular array of mechanical ventilation units mounted at roof level which will project above the main parapet by no more than 800mm”*.

**Belcamp 220kV and 110kV Substation**

4.6 *ABP Reference VA0014*

The Belcamp 220kV and 110kV Substation project was permitted by An Bord Pleanála under ABP Ref.: VA0014 (Belcamp and Clonshaugh, County Dublin, (S. 182E Pre-Application Reference VC0058) on the 12<sup>th</sup> of February 2013. The

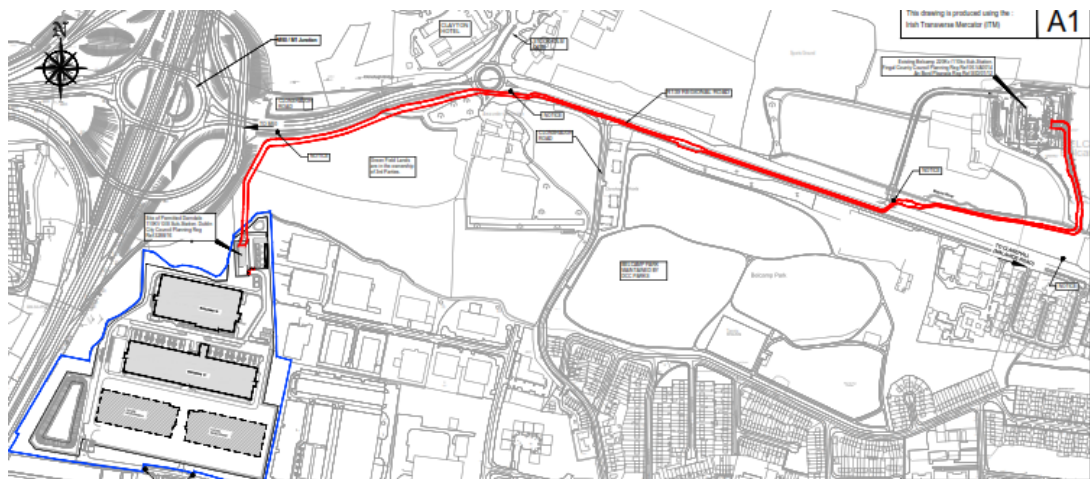
Applicant was EirGrid. The application related to proposed electricity transmission infrastructure, including 220kV and 110kV Substation buildings, and associated works, within a site of approximately 2.7 hectares, off the northern side of the N32 public road in the townlands of Belcamp and Clonshaugh, County Dublin.

The above grant of permission followed a Section 182E pre-application consultation with the Board for the Belcamp 220kV and 110kV Substation under ABP Ref.: VC0058 (project name 'Dublin North City Fringe Area') which was decided on the 27<sup>th</sup> of July 2012.

## **5.0 DEVELOPMENT DESCRIPTION**

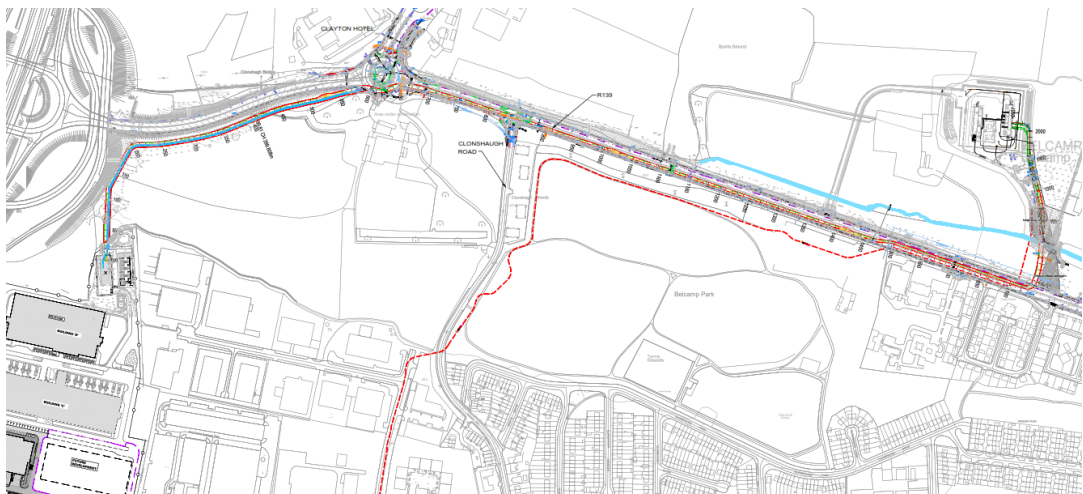
- 5.1 The proposed development comprises the provision of a double circuit 110kV underground transmission line between the Belcamp 220kV and 110kV Substation (permitted under ABP Ref.: VA0014) located to the north of the R139 and the Darndale 110kV Substation (permitted under DCC Reg. Ref.: 3288/16 & Reg. Ref.: 3874/15) located at the former Diamond Innovations Site, Clonshaugh Business and Technology Park, Dublin 17.
- 5.2 The proposed transmission line covers a distance of approximately 2 km within the following townlands:
- Belcamp, Co. Dublin;
  - Clonshaugh, Co. Dublin;
  - Willsborough, Co. Dublin.
- 5.3 The underground cable will follow a route originating at the Darndale Substation extending north along the periphery of a green field site for a distance of c. 180m, before realigning east for a further distance of approximately c. 390m. The route then enters the R139 on the south west side of the roundabout adjacent to the Clayton Hotel. The proposed transmission line proceeds eastwards and runs along the route of the R139 before entering private lands south of the River Mayne. The transmission line then passes under the River Mayne via open cut before entering the Belcamp Substation site from the south. 3 no. joint bays are proposed on each circuit, providing for a total of 6 no. joint bays at 3 no. locations. The development includes adjacent access paths, connections to the two substations, all associated construction works, and all ancillary works.
- 5.4 As outlined in Figure 2 and Figure 3 below, the proposed transmission line will primarily be routed along the R139 which runs to the north of Belcamp Park and Clonshaugh Business and Technology Park in North Dublin.





**Figure 2: Extract from site location map**

- 5.5 This project is designed to support current power demand and future growth within the Clonshaugh area inclusive but not limited to (i.e. the proposal will form a part of the transmission network) the power requirements for the existing and future developments within the ADSIL site. The site has a power supply at present, however, the utility provider has requested that ADSIL switch substations for network reasons.



**Figure 3: Proposed Site Layout Plan**

- 5.6 The proposed development will comprise the laying of an underground double 110kV circuit transmission line between the 2 no. substations. The two no. substations are located c. 2 kilometres apart, and are separated by industrial buildings, greenfield lands, parklands and roadways.
- 5.7 The development includes adjacent access paths along portions of the transmission line route, connections to the two substations at either end of the proposed transmission line, along with all associated site and construction works, and all ancillary works.
- 5.8 There is an existing, permitted construction compound to the southeast of the Darndale Substation which will serve the proposed development works.

## 6.0 RELEVANT REGIONAL PLANNING POLICY

### Draft Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly

6.1 The Eastern and Midlands Regional Assembly (EMRA) have published the Draft Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Region. The public consultation period on the draft strategy concluded on the 23<sup>rd</sup> of January 2019.

6.2 The Draft RSES recognises the need to facilitate the provision of sufficient electricity to meet increasing demand in the region. The draft strategy states the following:

*“The main energy networks serving the Region are electricity and gas. Having regard to projected population growth and economic growth in the Region it is important that the existing electricity and gas networks can be upgraded to provide appropriate capacity to facilitate development of the Region.”*

6.3 The draft strategy goes on to state the following:

*“The Dublin Region is the major load centre on the Irish electricity transmission system. Approximately one third of total demand is located here. Part of the Eastern Region is within the Greater Dublin Area and is similarly a major load centre on the Irish transmission system. The main urban demand centres are composed of a mix of residential, commercial and industrial demand, which is expected to grow up to 2025 and beyond. Developing the grid in the Region will enable the transmission system to safely accommodate more diverse power flows from renewable generation and also to facilitate future growth in electricity demand. These developments will strengthen the grid for all electricity users, and in doing so will improve the security and quality of supply. This is particularly important if the Region is to attract high technology industries that depend on a reliable, high quality, electricity supply.”*

6.4 The current proposal seeks to provide for the development of the grid via a new transmission line which will supply *inter alia* high technology industry in the area, which is dependent on a reliable, high quality electricity supply.

6.5 Regional Policy Objective 10.15 of the Draft RSES is to *“Support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the Region and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this Strategy including the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity transmission grid in a sustainable and timely manner subject to appropriate environmental assessment and the planning process.”*

6.6 The Draft RSES provides for a series of principles, pursuant to which Local Authority Development Plans will *“facilitate the provision of energy networks in principle”*:

- *“the development is required in order to facilitate the provision or retention of significant economic or social infrastructure*
- *the route proposed has been identified with due consideration for social, environmental and cultural impacts*
- *the design is such that it will achieve least environmental impact*
- *where impacts are inevitable mitigation features have been included*

- *where it can be shown that the proposed development is consistent with international best practice with regard to materials and technologies and that it will ensure a safe, secure, reliable, economic and efficient high-quality network*
- *in considering facilities of this nature that traverse a number of counties or that traverse one county in order to serve another, Planning Authorities should consider the proposal in light of the criteria outlined above. It is important that planning authorities are engaged in early consultation and discussion with the relevant Transmission System Operator*
- *corridors for energy transmission or pipelines should avoid creating sterile lands proximate to key public transport corridors, particularly rail routes, and in built up urban areas."*

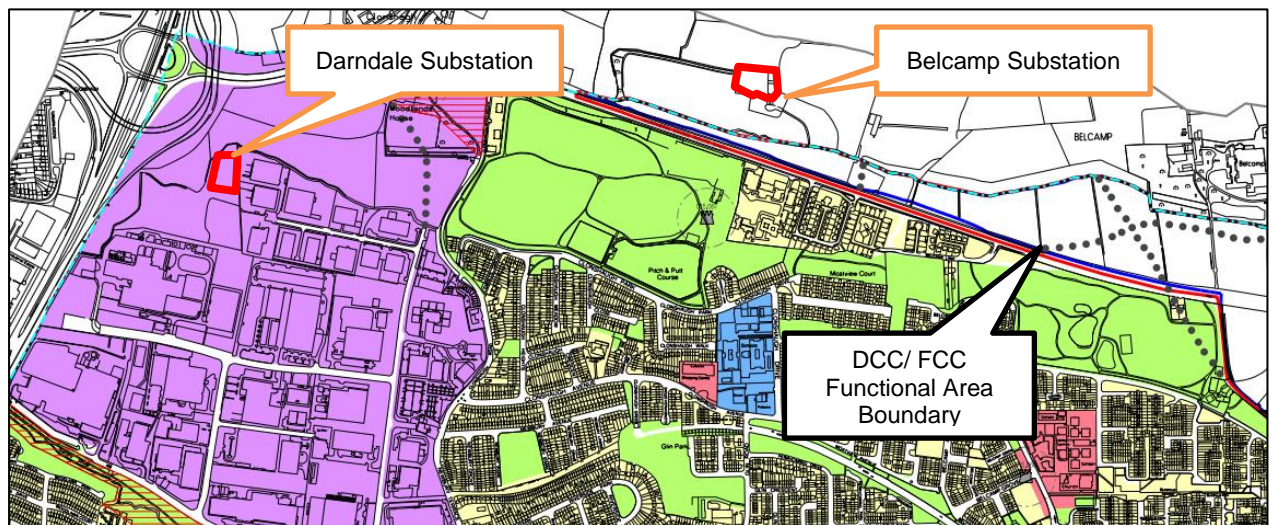
6.7 In response to the above it is considered that the proposed, comparatively short, electricity transmission infrastructure is required to facilitate significant economic infrastructure in the area. It is also considered that the route for the proposed transmission line has been identified with due consideration for social, environmental and cultural impacts (as set out in detail within the EIAR). The design selected has been predicated on the need to minimise environmental impact and includes mitigation measures as set out within the EIAR and NIS submitted herewith. The design of the project has been undertaken in accordance with best practice by the project engineers, and the corridor selected will avoid the sterilisation of lands proximate to key public transport corridors, particularly rail routes, or built up urban areas.

#### ***Regional Planning Guidelines for the Greater Dublin Area 2010-2022***

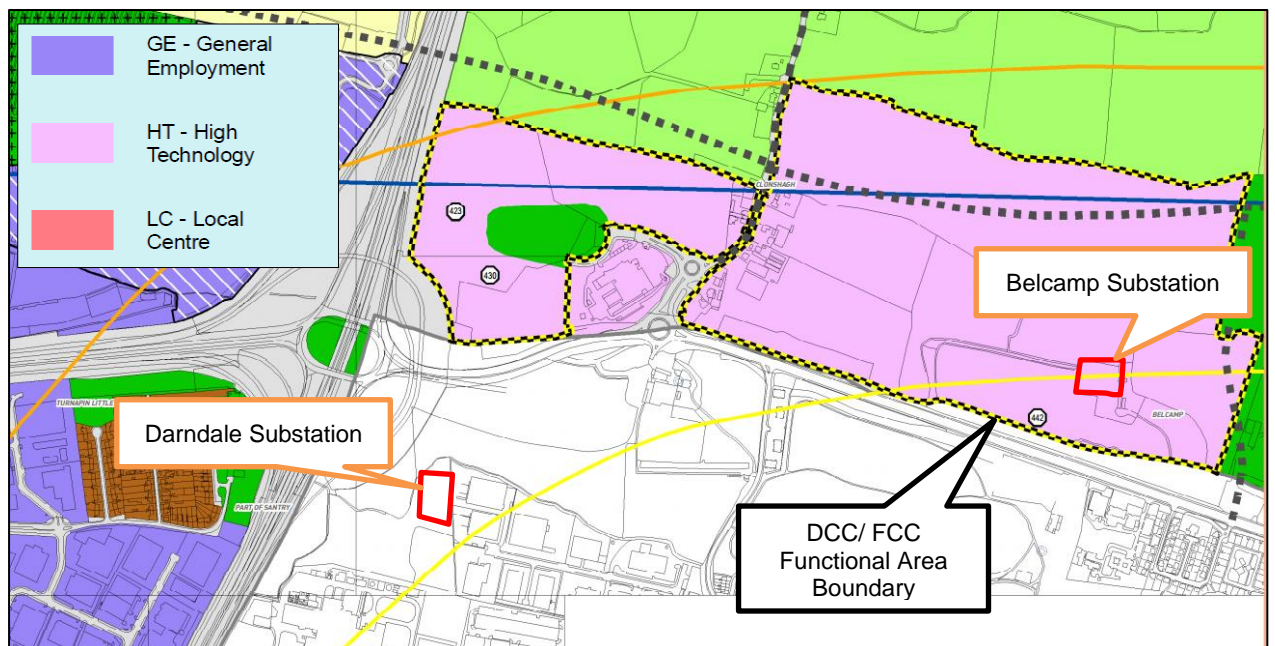
- 6.8 The Regional Planning Guidelines (RPG) for the Greater Dublin Area remain in force at present, pending the adoption of the new RSES for the EMRA. The RPGs recognise that economic development within the GDA is dependent on the availability and quality of services and utilities including electricity supply. The RPGs state that *'the demand for electricity in the GDA region is expected to increase by over 80% by 2025 and will then be 30% of the demand of the island'* (p.61). The RPGs identify the key infrastructure needs of the GDA to support the increased demands on the region. Specifically, in relation to energy, the guidelines recognise that Ireland's continued economic growth has resulted in a marked increase in the consumption of electricity since the late 1990s.
- 6.9 Strategic Policies (PIP) and Recommendations (PIR) in relation to Energy include:
- Strategic Policy PIP4: *'That the ICT and energy needs of the GDA shall be delivered through the lifespan of the RPGs by way of investment in new projects and corridors to allow economic and community needs to be met, and to facilitate sustainable development and growth to achieve a strong and successful international GDA Gateway'* (p.35).
  - Strategic Recommendation PIR25: *'That reinforcements and new infrastructure are put in place by the key agencies, and their provision is supported in Local Authority policies, to ensure the energy needs of future population and economic expansion within designated growth areas and across the GDA can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs'* (p.136).

**7.0 LOCAL PLANNING POLICY**

- 7.1 This proposed development comprises of development within the functional areas of 2 no. Planning Authorities; Dublin City Council and Fingal County Council.
- 7.2 The site of the existing Data Storage Facilities at Clonshaugh Business and Technology Park and the Darndale 110kV Substation is located within the functional area of Dublin City Council, while the Belcamp 220kV and 110kV Substation is located within the Fingal County Council functional area.
- 7.3 The proposed development, comprising of an underground double circuit 110kV transmission line between the two Substations for the purpose of electricity transmission, will run between the two Substations and will therefore comprise development works within the functional areas of both Planning Authorities



**Figure 5: Extract from Zoning Map B of the Dublin City Development Plan**



**Figure 6: Extract from Zoning Map 11 of the Fingal County Development Plan 2017-2023**

### Fingal County Development Plan 2017-2023

- 7.4 The section of the application site located within Fingal is subject to zoning objective 'HT'- High Technology as illustrated in Figure 6 above. This zoning objective seeks to *'provide for office, research and development and high technology/high technology manufacturing type employment in a high quality built and landscaped environment'*.
- 7.5 The vision of the HT objective is to:
- 'Facilitate opportunities for high technology, high technology and advanced manufacturing, major office and research and development based employment within high quality, highly accessible campus style settings. The HT zoning is aimed at providing a location for high end, high quality, value added businesses and corporate headquarters. An emphasis on exemplar sustainable design and aesthetic quality will be promoted to enhance corporate image and identity'*.
- 7.6 The 'HT' Zoning Objective does not make specific reference in the list of permitted uses to a transmission line. However, having regard to the permitted uses (such as high technology manufacturing, industry light, telecommunications structures and utility installations) under the County Development Plan land use zoning matrix (see Figure 7 below), it is considered that the proposed transmission line complies with the land use zoning objectives for the site.

USE CLASSES RELATED TO ZONING OBJECTIVE		
Permitted in Principle		
Enterprise Centre	High Technology Manufacturing	Hospital
Industry - Light	Office Ancillary to Permitted Use	Office ≤ 100sqm
Office > 100sqm and < 1,000sqm	Office ≥ 1,000sqm	Open Space
Research and Development	Restaurant/Café <sup>5</sup>	Retail - Local < 150 sqm nfa <sup>5</sup>
Sustainable Energy Installation	Telecommunications Structures	Training Centre
Utility Installations		

**Figure 7: Use Classes related to Zoning Objective**

#### Airport Noise Zones

- 7.7 Figure 6 indicates that a section of the site is situated within the outer airport noise zone. The Fingal County Development Plan contains the following objective relating to development proposals within these zones:

Objective EE51: *'Strictly control inappropriate development and require noise insulation where appropriate within the Outer Noise Zone, and actively resist new provision for residential development and other noise sensitive uses within the Inner Noise Zone, as shown on the Development Plan maps, while recognising the housing needs of established families farming in the zone.'*

- 7.8 The proposed development is not considered a noise sensitive use.

### Dublin City Development Plan 2016-2022

- 7.9 The section of the application site located within Dublin City Council's functional area is zoned Z6 – Employment/Enterprise. The zoning objective states:

*'To provide for the creation and protection of enterprise and facilitate opportunities for employment creation'.*

- 7.10 Permissible Uses within Zone Z6 include Green/Clean light industries, Industry (light), Science and technology-based industry. The development plan states; *'It is considered that Z6 lands constitute an important land bank for employment use in the city, which is strategically important to protect. The primary objective is to facilitate long-term economic development in the city region'.*
- 7.11 The proposed transmission line will be designed to support current power demand and future growth within the Clonshaugh area and can be considered enabling infrastructure necessary to support employment growth and facilitate economic development. The project is required to provide necessary infrastructure between the Belcamp Substation and the Darndale Substation. It is therefore considered that the proposed development complies with the land use zoning objective for these Z6 zoned lands.
- 7.12 Policy SI33 of the Development Plan states the objective *'To support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the city, and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this plan, subject to relevant Irish planning and European legislation including Article 6 of the Habitats Directive and/or environmental assessment'.*
- 7.13 Policy SI34 requires that *'the location of local energy services such as electricity, telephone and television cables be underground wherever possible, and to promote the undergrounding of existing overhead cable and associated equipment, where appropriate'.*
- 7.14 The proposed transmission line will be routed underground in line with Policy SI34, and we note the policy support for new transmission infrastructure projects outlined in Policy SI33.

## **8.0 ENVIRONMENTAL IMPACT ASSESSMENT AND APPROPRIATE ASSESSMENT**

- 8.1 An Environmental Impact Assessment Report (EIAR) has been prepared / coordinated by AWN Environmental Consultants and is submitted along with this application.
- 8.2 An Appropriate Assessment Screening Report and a Natura Impact Statement (NIS, for Stage 2 Appropriate Assessment) have been prepared by Moore Group, Consultant Ecologists, and are included as Appendix 7.1 and 7.2 of the EIAR.

## **9.0 CONCLUSION**

- 9.1 This planning application relates to the provision of a double circuit 110kV underground transmission line between the Belcamp 220kV and 110kV Substation (permitted under ABP Ref.: VA0014) located to the north of the R139 and the Darndale 110kV Substation (permitted under DCC Reg. Ref.: 3288/16 & Reg. Ref.: 3874/15) located at the former Diamond Innovations Site, Clonshaugh Business and Technology Park, Dublin 17.
- 9.2 This project is designed to support current power demand and future growth within the Clonshaugh area inclusive but not limited to the power requirements for the existing and future developments within the ADSIL site.

- 9.3 The proposal is in accordance with the policies and objectives of the Fingal County Development Plan 2017-2023 and the Dublin City Development Plan 2016-2022.
- 9.4 It has been demonstrated within this report, as well as within the accompanying drawings, documents, Natura Impact Statement, and Environmental Impact Assessment Report that the proposal provides a suitable use of the subject lands. The applicant and design team in preparing the application documentation have considered the issues raised within the pre-application meetings held with An Bord Pleanála and their determination issued prior to the lodgement of this application.
- 9.5 The Applicant respectfully requests An Bord Pleanála to reach a decision on this application by the 26<sup>th</sup> of July 2019, or as expeditiously as possible to enable our construction program.
- 9.6 If you require any further information, or clarification on the above, please do not hesitate to contact us.

Yours faithfully,



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**John Spain Associates**