

Planning Report for a Strategic Infrastructure Development

In respect of

Proposed 220kV Gas Insulated Switchgear Substation and Underground Double Circuit 220kV Transmission Line

Prepared by

John Spain Associates

On behalf of

Amazon Data Services Ireland Ltd. (ADSIL)

March 2020



39 Fitzwilliam Place
Dublin 2
D02 ND61
Telephone: (01) 662 5803
E-mail: info@johnspainassociates.com

CONTENTS

1.0	INTRODUCTION AND CONTEXT	3
2.0	SITE LOCATION AND CONTEXT.....	4
3.0	PRE – APPLICATION CONSULTATIONS	6
4.0	RELEVANT PLANNING HISTORY	7
5.0	DEVELOPMENT DESCRIPTION	10
6.0.....	RELEVANT NATIONAL AND REGIONAL PLANNING POLICY.....	11
7.0	LOCAL PLANNING POLICY	13
8.0.....	ENVIRONMENTAL IMPACT ASSESSMENT AND APPROPRIATE ASSESSMENT	16
9.0	CONCLUSION.....	16

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 220kV transmission line and a 220kV Gas Insulated Switchgear (GIS) substation along with associated and ancillary works.
- 1.2 The proposed 220kV GIS substation is to be located on lands to the north of the data storage facility permitted under An Bord Pleanála Reg. Ref.: PL06F.248544 / Fingal County Council Reg. Ref.: FW17A/0025, to the west of the data storage facilities permitted under Fingal County Council Reg. Ref.: FW19A/0087, and within an overall landholding bound to the south by the R121 / Cruiserath Road, to the west by the R121 / Church Road and to the north by undeveloped land and Cruiserath Drive, Dublin 15.
- 1.3 The proposed 220kV GIS substation includes the provision of four transformers, a two storey GIS substation building (with a gross floor area of 1,988 sq.m) within a 2.6 m high fenced compound.
- 1.4 The proposed double circuit 220kV transmission line will run through private lands between the proposed 220kV GIS substation and the existing Corduff 110kV and 220kV substation (permitted under An Bord Pleanála Reg. Ref.: PL06F.129046 / Fingal County Council Reg. Ref.: F01A/1464), located on lands to the west of Corduff Road, Dublin 15. The proposed transmission line covers a distance of approximately 1.8 km within the townlands of Cruiserath, Co. Dublin, Goddamendy, Co. Dublin, and Bay, Co. Dublin.
- 1.5 The underground transmission line will follow a route originating at the proposed 220kV GIS substation, extending north towards Cruiserath Drive before realigning eastward and crossing below an existing private roundabout by way of horizontal directional drilling. The transmission line then proceeds eastwards, passing beneath a land drain associated with the Mooretown Stream, before entering the existing Corduff substation from the south.
- 1.6 The development includes adjacent access paths to provide access to the joint bays, connections to the two substations (existing and proposed), changes to landscaping and berms permitted under An Bord Pleanála Reg. Ref.: PL06F.248544 / Fingal County Council Reg. Ref.: FW17A/0025, provision of car parking within the substation compound, provision of a 49kVA electricity connection (c. 470m in length, traversing the Cruiserath Road to the southwest of the proposed substation site) for the substation building, landscaping, services, all associated construction works, and all ancillary works.
- 1.7 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.
- 1.8 This planning application relates to the provision of a 220kV GIS substation and an underground double circuit 220kV transmission line from the proposed substation to

the existing Corduff substation. This project is designed to support current power demand and future growth within the Cruiserath area inclusive but not limited to the power requirements for the permitted and future developments within the ADSIL site. The details of the proposed substation and the proposed route for the underground double circuit 220kV transmission line are discussed at Section 5.0 of this report and illustrated in the accompanying architectural and engineering 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 submitted herewith).

1.9 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

1.10 The development of the proposed 220kV 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 proposed 220kV substation and the underground double circuit 220kV transmission line to the existing Corduff 110kV and 220kV substation.

1.11 Upon completion of the works by the Developer, the proposed 220kV GIS Substation and underground double circuit 220kV transmission line will be handed over to EirGrid, whom in conjunction with ESB Networks (ESBN) will carry out the final commissioning and energisation of the proposed substation and underground double circuit 220kV transmission line.

1.12 Once energised, the proposed substation and the underground double circuit transmission line will form part of the ESBN infrastructure, which EirGrid will be responsible for operating.

Applicant

1.13 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.

1.14 The main agent acting on behalf of the Applicant is John Spain Associates, with an address at 39 Fitzwilliam Place, Dublin 2.

2.0 SITE LOCATION AND CONTEXT

2.1 The proposed development comprises the provision of a 220kV Gas Insulated Switchgear (GIS) substation, to be located on lands off Cruiserath Road, Dublin 15, and an underground double circuit 220kV transmission line from the proposed substations to the existing Corduff 110kV and 220kV substation which is located to

the northeast of the proposed substation site, off an existing distributor road serving nearby industrial areas.

- 2.2 The direct distance between the proposed and existing substations is c. 1km, whilst the proposed transmission line route is c. 1.8 kilometres long.

Proposed 220kV GIS Substation

- 2.3 The proposed 220kV GIS substation is to be located on lands located off the Cruiserath Road and Church Road, Dublin 15. The site is bounded to the south by the R121 / Cruiserath Road, to the west by the R121 / Church Road and to the north by undeveloped land and the Hollywood Road.

- 2.4 The site for the proposed 220kV GIS substation is greenfield in nature, and is level in its topography. The site is highly accessible having regard to its location off the Cruiserath Road and Church Road.

- 2.5 The lands surrounding the proposed site are currently undeveloped, but are subject to a planning permission under Reg. Ref.: FW17A/0025 & ABP Reg. Ref.: PL 06F.248544 for the development of a data storage facility to the south of the substation site and under Reg. Ref.: FW19A/0087 for development of two further data storage facilities to the east and northeast of the substation site.

- 2.6 A 110kV AIS and 220kV GIS substation were initially included in a planning application for a data storage facility and associated development at Cruiserath Road, Dublin 15. A final grant of permission for the data storage facility was issued by An Bord Pleanála under ABP Reg. Ref. PL 06F.248544 (FCC Reg. Ref.: FW17A/0025). Condition No. 2 of the Board's Order states that the permission does not "*authorise the provision of any grid connection or the provision of the 220kV substation*". See Section 4, Planning History for further details.

- 2.7 Accordingly, the Applicant is submitting this pre-application request to An Bord Pleanála under Section 182E of the Planning and Development Act 2000 (as amended).

Corduff Substation

- 2.8 The existing Corduff 110kV and 220kV substation is located to the northeast of the lands whereon the 110kV AIS substation and 220kV GIS substation is proposed (at a direct distance of c. 1 km from the proposed substation site). The Corduff substation is bound to the south and west by undeveloped lands, and is situated to the north east of an industrial site (a bulk pharmaceutical production facility), between the existing substation and the site of the proposed Substations described above.

- 2.9 To the north of the Corduff 110kV and 220kV substation is a site occupied by a large industrial / warehousing unit. The ESB Dublin Supplies Store complex is located to the south of the substation separated by undeveloped lands, which includes a wooded area.

- 2.10 The Corduff 110kV and 220kV substation is accessed via a spur off an existing distributor road which serves industrial / employment areas between the N2 and N3 national primary roads.

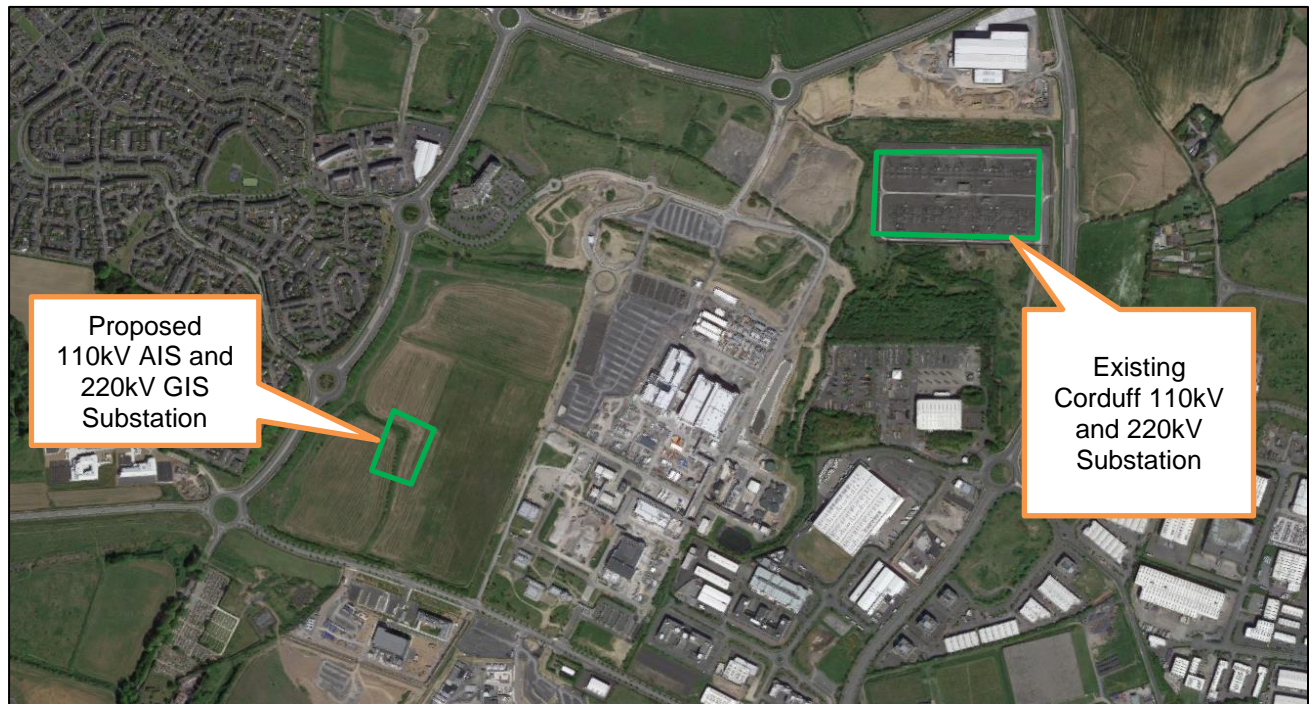


Figure 1: Context Map (image from Google Maps)

3.0 PRE – APPLICATION CONSULTATIONS

- 3.1 The applicant has had 1 no. pre-application consultation meeting with An Bord Pleanála on the 24th of August 2018, in response to a pre-application consultation request received by An Bord Pleanála on the 13th of April 2018.
- 3.2 The purpose of the 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 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.
- 3.4 Consultation has also been undertaken with the planned operator ESB Networks to ensure the project design meets their requirements.
- 3.5 A request to conclude the pre-application process was submitted to An Bord Pleanála on the 22nd of July 2019. The request included details of minor alterations to the route alignment of the proposed transmission line and other minor alterations to the project as originally set out for pre-application consultation. The Board's Inspector confirmed that these alterations did not materially alter the pre-application request.

An Bord Pleanála Determination

- 3.6 An Bord Pleanála have confirmed in a letter dated the 15th of August 2019 that the proposed development constitutes Strategic Infrastructure within the meaning of section 182A of the Act.
- 3.7 Therefore, the current application is required to be submitted directly to An Bord Pleanála under section 182A(1) of the Act.
- 3.8 The determination from the Board that the development constitutes a SID was accompanied by an Inspector's Report, which recommended that the applicant be informed that the proposed development constitutes Strategic Infrastructure.

4.0 RELEVANT PLANNING HISTORY

- 4.1 This section provides details of the planning history of both the site of the proposed 220kV GIS substation site at Cruiserath and the existing Corduff substation.

Proposed Substation Site (off Cruiserath Road)

- 4.2 *Reg. Ref.: FW17A/0025 & ABP Reg. Ref.: PL 06F.248544 – Permitted Data Storage Facility to the South of the Proposed Substation and Associated Development*

An order to grant permission dated the 18th of January 2018 was issued by An Bord Pleanála for the development of a data storage facility on a site bounded by the R121 Cruiserath Road, R121 Church Road, and Hollywood Road, Dublin 15.

The development description for the application as originally submitted to Fingal County Council was as follows:

- *“Construction of a data storage facility building with an overall height of c. 13 metres, containing data halls, associated electrical and AHU Plant Rooms, a loading bay, maintenance and storage space, office administration areas, screened plant and solar panels at roof level, all within a building with a total gross floor area of 20,739 sq.m;*
- *Emergency generators, emission stacks and a paladin fencing boundary treatment are provided in the adjacent compound;*
- *A temporary client control building, a transformer bay, a temporary substation, a permanent MV Switchroom building and a permanent MV / Control room building are to be provided for the construction phase;*
- *The permanent power supply will include the construction of a 220kv Gas Insulated Switchgear (GIS) substation building with a GFA of 1,350 sq.m and construction of 4 no. transformer bays;*
- *A water sprinkler pump room and storage tank, humidifier tanks and diesel tanks and filling area;*
- *Modification of the existing entrance and a new access control point to the lands from the existing roundabout on the R121 / Church Road to the west of the application site and a single-storey gate house / security building at this entrance with a GFA of 152 sq.m. A secondary entrance is proposed on the southern boundary, which also provides for construction access;*
- *Construction of internal road network and circulation areas, footpaths, provision of 46 no. car parking spaces (inclusive of 5 no. visitor parking*

spaces and 3 no. disabled spaces), 1 no. motorbike parking space and 15 no. cycle parking spaces;

- *Landscaping and planting, boundary treatment, lighting, security fencing, bollards and camera poles, and all associated site works including underground foul and storm water drainage network, attenuation areas, and utility cables, on an application site area measuring 26.14 hectares.”*

An Environmental Impact Statement (EIS) was submitted with the application which assessed the potential Environmental Impacts of the originally proposed development, including the 110kv AIS and 220kV GIS substations.

A decision to grant permission subject to conditions was issued for the development by Fingal County, however, the decision of the Planning Authority was appealed to An Bord Pleanála by two no. Third Parties. One of the Third Parties requested an Oral Hearing which was subsequently granted by An Bord Pleanála.

In a letter dated 1st of September 2017, An Bord Pleanála set out the Agenda for the Oral Hearing and requested the Applicant to elaborate further on the ‘*proposed grid connection (including substation)*’ and drew the Applicants attention ‘*to the provisions under Section 182B, including the definition of transmission under subsection (9)*’.

An Oral Hearing was held in respect of the application on the 26th and 27th of September 2017. During the course of the Oral Hearing, it was submitted by Mr. Rory Mulcahy SC for the Applicant, that too narrow a view may have been taken of what constitutes “transmission” within the meaning of section 182A and that, particularly when the substation and grid connection are considered together, they may be more appropriately dealt with pursuant to section 182B of the Planning and Development Act 2000 (as amended) – in this regard, the view is supported when considered in the context of the detailed assessment of this issue by the ABP in the context of ABP Reg Ref.: VC0087.

At the Oral Hearing, Mr. Mulcahy noted that in assessing the application for the proposed development, should the Board have concern that the substation ought properly be regarded as development within the meaning of section 182A of the Planning and Development Act 2000 (as amended), that the Board should omit the substation by Condition from any decision it might make to grant permission and that the substations and grid connection could be addressed via a Section 182A SID application to the Board.

A final grant of permission for the data storage facility was issued by An Bord Pleanála under ABP Reg. Ref. PL 06F.248544 (FCC Reg. Ref.: FW17A/0025). Condition No. 2 of the Board’s Order states that the permission does not “*authorise the provision of any grid connection or the provision of the 220kV substation*”.

Having regard to this condition, this application for the proposed substation and transmission line is now being made to An Bord Pleanála.

4.3 *Reg. Ref.: FW19A/0087 – Permitted Data Storage Facilities to the East and Northeast of the Substation Site*

On the 27th of August 2019, a final grant of permission was issued by the Planning Authority for the provision of two data storage facilities on the same landholding as

the proposed substation site. These two data storage facilities will be located to the east and northeast of the site of the proposed substation. The description of the permitted development is as follows:

- *“Construction of two data storage facilities with a maximum overall height of c. 22 metres;*
- *Each of the two data storage facilities will accommodate data halls, associated electrical and mechanical Plant Rooms, loading bays, maintenance and storage space, office administration areas, screened plant and solar panels at roof level;*
- *Each of the proposed data storage facilities will have a gross floor area over two levels of c. 21,705 sq.m (43,410 sq.m in total);*
- *Emergency generators (24 for each data storage facility), and associated emission stacks are provided in compounds adjacent to each of the two buildings;*
- *The development includes a diesel tank and a filling area to serve the proposed emergency generators;*
- *Construction of internal road network and circulation areas, footpaths, provision of 50 no. car parking spaces for each of the two data storage facilities (100 no. in total), and 25 no. cycle parking spaces for each of the two data storage facilities (50 no. in total);*
- *Connections to vehicular access routes, roads, services and infrastructure permitted under An Bord Pleanála Reg. Ref.: PL06F.248544 / Fingal County Council Reg. Ref.: FW17A/0025;*
- *Hard and soft landscaping and planting, lighting, and all associated works including underground foul and storm water drainage network, attenuation area, and utility cables.”*

Corduff Substation

4.4 Reg. Ref.: F01A/1464 & ABP Reg. Ref.: PL06F.129046

On the 9th of September 2003, an Order to grant permission with revised conditions was issued by An Bord Pleanála in respect of the following development:

“A new 220/110kV outdoor substation at Goddamendy Bay and Cruiserath townlands, Blanchardstown, Dublin 15. The Substation will comprise of the following:

- *One double 220kV busbar equipped with four overhead line bays, two transformer bays and two coupler bays;*
- *one double 110kV busbar equipped with four overhead line bays, two underground cable bays, two transformer bays, two coupler bays, two 220/110kV 250MVA transformers, a substation control building & associated steel work.*
- *Short overhead line loop-ins to above substation bays at 220kV and 110kV voltage levels.”*

4.5 Reg. Ref.: F05A/0148

On the 26th of April 2005, a final grant of permission was issued by Fingal County Council for the following development at the Corduff substation consisting of *“the equipping of a 220kV cable bay”*.

Other

4.6 *Reg. Ref.: FW19A/0177*

On the 29th of October, an application was submitted by ESB Engineering & Major Projects for a proposed medium voltage cable. The application site for this cable was partly within the lands subject to the current SID application, and therefore the site notices for the current application are on a yellow background as this valid application was submitted less than 6 months before the submission of the current application. A final grant of permission was issued on the 30th of January 2020.

5.0 DEVELOPMENT DESCRIPTION

220kV Gas Insulated Switchgear (GIS) Substation

- 5.1 The proposed 220kV Gas Insulated Switchgear substation is to be located on lands which are currently greenfield in nature, to the north of north of the data storage facility permitted under An Bord Pleanála Reg. Ref.: PL06F.248544 / Fingal County Council Reg. Ref.: FW17A/0025, to the west of the data storage facilities permitted under Fingal County Council Reg. Ref.: FW19A/0087, and within an overall landholding bound to the south by the R121 / Cruiserath Road, to the west by the R121 / Church Road and to the north by undeveloped land and Cruiserath Drive, Dublin 15.
- 5.2 The substation buildings and equipment will be accommodated within a proposed compound bounded by a security fence 2.6 metres in height. The substation compound will take in a permitted client control building (permitted under An Bord Pleanála Reg. Ref.: PL06F.248544 / Fingal County Council Reg. Ref.: FW17A/0025), a proposed GIS substation building (two storeys in height), four transformers, and car parking (6 no spaces).
- 5.3 The two storey GIS substation building (with a gross floor area of 1,988 sq.m) will accommodate a cable room, control room, mess room, generator room, battery room and workshop at ground floor level, with a storeroom and substation room provide at first floor level. The building design is rectilinear, and the building will be finished in metal cladding to match the permitted data storage facilities on site.
- 5.4 The proposed transformers will be located centrally within the substation compound, set out in a row running north-south within the compound area.
- 5.5 The substation compound will be accessed from the permitted internal circulation roads and infrastructure permitted under An Bord Pleanála Reg. Ref.: PL06F.248544 / Fingal County Council Reg. Ref.: FW17A/0025 and Fingal County Council Reg. Ref.: FW19A/0087. A main access gateway to the compound will be provided on the southern side of the substation compound, providing for vehicular and pedestrian access to the substation area.

220kV Underground Transmission Line

- 5.6 The proposed 220kV transmission line will run through private lands between the proposed 220kV GIS substation and the existing Corduff 110kV and 220kV substation (permitted under An Bord Pleanála Reg. Ref.: PL06F.129046 / Fingal County Council Reg. Ref.: F01A/1464), located on lands to the west of Corduff Road,

Dublin 15. The proposed transmission line covers a distance of approximately 1.8 km within the townlands of Cruiserath, Co. Dublin, Goddamendy, Co. Dublin, and Bay, Co. Dublin.

- 5.7 The underground transmission line will follow a route originating at the proposed 220kV GIS substation, extending north towards Cruiserath Drive before realigning eastward and crossing below an existing private roundabout by way of horizontal directional drilling. The transmission line then proceeds eastwards, passing beneath a land drain associated with the Mooretown Stream, before entering the existing Corduff substation from the south.
- 5.8 The proposed underground transmission line will be punctuated by Joint Bays and Pull Pits at various points along the c. 1.8-kilometre route as illustrated in the accompanying drawings prepared by CSEA Consulting Engineers.

Associated / Ancillary Works

- 5.9 The development includes the provision of adjacent access paths, and connections to the two substations (existing and proposed). This includes the fitting out works required to the relevant cable bays within the existing Corduff substation which are necessary to connect the proposed underground transmission line.
- 5.10 The development includes changes to landscaping and berms permitted under An Bord Pleanála Reg. Ref.: PL06F.248544 / Fingal County Council Reg. Ref.: FW17A/0025. Minor amendments to the permitted line of security fencing along the site boundary are also proposed. These changes result from the design and routing of the proposed transmission line and are minor in the context of the overall landholding and the development permitted thereon.
- 5.11 The development also includes the provision of a 49kVA electricity connection (c. 470m in length, traversing the Cruiserath Road to the southwest of the proposed substation site) to serve the substation building. This connection is separate from the 220kV transmission line, and is required to provide a 'house connection' for the substation building.
- 5.12 The development includes all associated construction and ancillary works.

6.0 RELEVANT NATIONAL AND REGIONAL POLICY CONTEXT

Government Statement on The Role of Data Centres in Ireland's Enterprise Strategy

- 6.1 The Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy was published by the Department of Business, Enterprise and Innovation in June 2018. The Statement notes the role which data centres play in Ireland's ambition to be a digital economy hot-spot in Europe.
- 6.2 The Statement includes a section dealing with electricity infrastructure (page 8 onward refers). The Statement includes the following statement in relation to the electricity infrastructure requirements of planned and projected data centre development:

“Currently, a large portion of existing and planned data centres that are due to connect to the electricity system are expected to be in the Dublin area. Based on existing data centres, committed expansion and expected growth, total demand could treble within the next ten years. A consistent and supportive whole of government approach will be brought to the realisation of the transmission and distribution assets required to support the level of data centre ambition that we adopt.”

- 6.3 The current Strategic Infrastructure Development proposal constitutes the provision of transmission infrastructure required to provide electricity for the development of the Cruiserath area, including three permitted data storage facilities.

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

- 6.4 The Eastern and Midlands Regional Assembly (EMRA) have adopted the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Region. There is at present a draft Ministerial Direction pending in relation to the RSES. Those parts of the RSES which are the subject of the draft Direction are taken not to have come into effect until the section 31A procedure has been completed. All other aspects of the RSES are considered to have been made / adopted as of 28th June 2019. The elements of the RSES to which the draft Direction relate are not of any relevance to the current Strategic Infrastructure Development proposal.

- 6.5 The RSES recognises the need to facilitate the provision of sufficient electricity to meet increasing demand in the region. Regional Policy Objective (RPO) 10.20 states the following:

“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 and gas transmission grid in a sustainable and timely manner subject to appropriate environmental assessment and the planning process.”

- 6.6 The proposed development constitutes a transmission project which is required to serve the electricity needs of permitted and future development in the Cruiserath area in accordance with the foregoing objective.

- 6.7 The 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, similarly the Eastern Region is 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.”

6.8 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.

6.9 The 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 and address issues of climate resilience, biodiversity, impact on soils and water quality.*
- *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.*
- *Regard for any National or Regional Landscape/ Seascape Character Assessment.”*

6.10 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 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.

7.0 LOCAL PLANNING POLICY

7.1 This proposed development comprises of development within the functional area of Fingal County Council.

Fingal County Development Plan 2017-2023

7.2 The application site is partially zoned HT and partially zoned GE under the Fingal County Development Plan 2017-2023, as illustrated in the extract from Zoning Map 12 provided above.

- 7.3 The section of the application site located to the west of the existing Corduff substation 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'*.

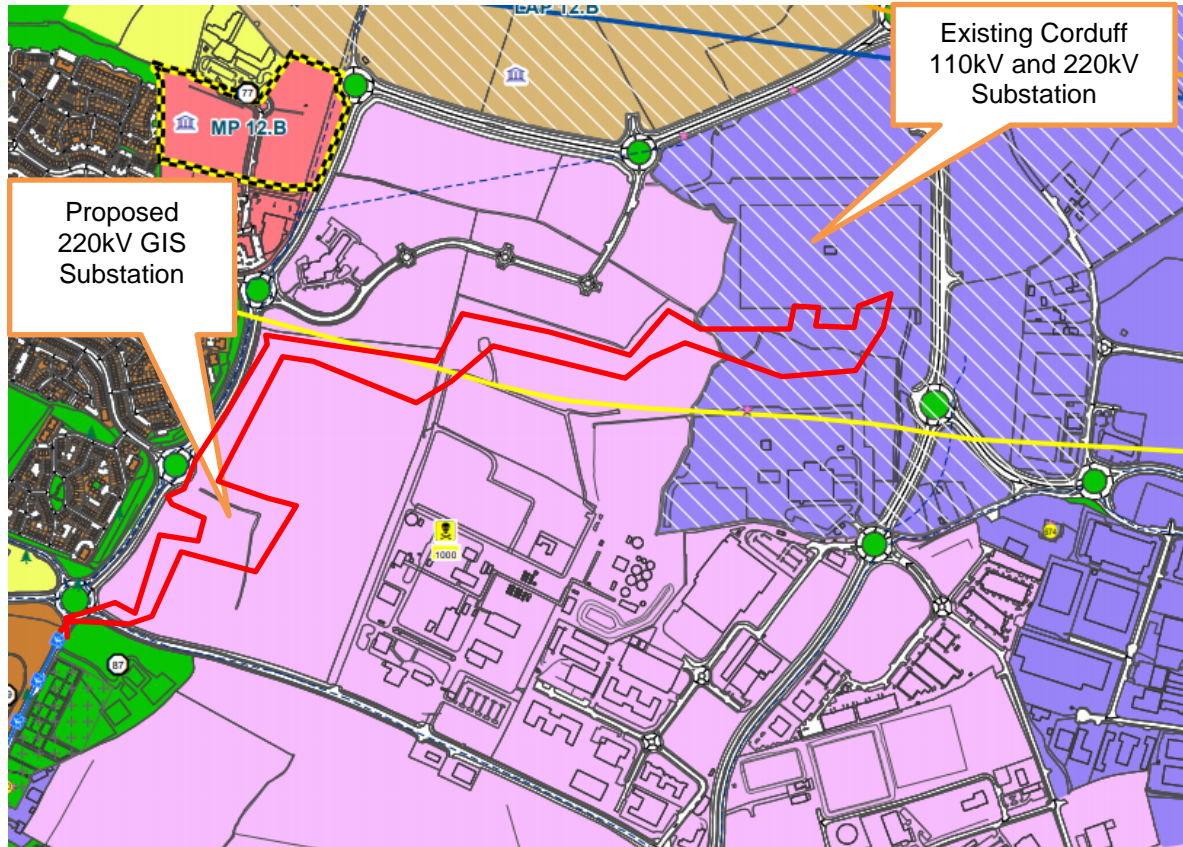


Figure 2: Extract from Zoning Map 12 of the Fingal County Development Plan 2017-2023 – Red Line Boundary for Illustrative Purposes Only

- 7.4 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.'

- 7.5 The 'HT' Zoning Objective does not make specific reference in the list of permitted uses to substations or transmission lines. 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 3 below), it is considered that the proposed substation and transmission line comply with the land use zoning objectives for the site. The proposed substation and transmission line are considered to fall broadly within the use-class of utility installations and are therefore consistent with the HT objective.

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 ⁵	Retail - Local < 150 sqm nfa ⁵
Sustainable Energy Installation	Telecommunications Structures	Training Centre
Utility Installations		

Figure 3: Permitted in Principle Use Classes related to Zoning Objective HT

7.6 The portion of the site falling within and adjacent to the existing Corduff substation is subject to a ‘GE’ – General Employment zoning objective. The GE zoning objective seeks to ‘provide opportunities for general enterprise and employment’.

7.7 The vision for the GE zoning objective is as follows:

“Facilitate opportunities for compatible industry and general employment uses, logistics and warehousing activity in a good quality physical environment. General Employment areas should be highly accessible, well designed, permeable and legible.”

7.8 The ‘GE’ Zoning Objective does not make specific reference in the list of permitted uses to substations or transmission lines. 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 4 below), it is considered that the proposed substation and transmission line comply with the land use zoning objectives for the site. The proposed substation and transmission line are considered to fall broadly within the use-class of utility installations and are therefore consistent with the GE objective. The portion of the proposed transmission line route subject to the GE zoning objective is also subject to an LAP – identified as LAP 12 A on Zoning Map 12 of the Development Plan. The LAP pertaining to this portion of the subject site is dealt with in further detail below.

Permitted in Principle		
Builders Provider/Yard	Civic Waste Facility	Enterprise Centre
Food, Drink and Flower Preparation/Processing	Fuel Depot/Fuel Storage	High Technology Manufacturing
Industry - General	Industry - Light	Logistics
Office Ancillary to Permitted Use	Open Space	Petrol Station
Research and Development	Restaurant/Café ⁵	Retail - Local < 150 sqm nfa ⁵
Road Transport Depot	Sustainable Energy Installation	Telecommunications Structures
Training Centre	Utility Installations	Vehicle Sales Outlet - Small Vehicles
Vehicle Sales Outlet - Large Vehicles	Vehicle Servicing/Maintenance Garage	Warehousing
Waste Disposal and Recovery Facility (Excluding High Impact)	Wholesale	

Figure 5: Permitted in Principle Use Classes related to Zoning Objective HT

Airport Noise Zones

7.9 Figure 2 indicates that a section of the site (relating to the proposed transmission line) 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.’*

7.10 The proposed development is not considered a noise sensitive use.

Cherryhound Local Area Plan (LAP)

7.11 The portion of the subject development site within and adjacent to (to the south and southwest) of the existing Corduff substation falls within the operational area of the Cherryhound LAP. The LAP was originally published in 2012, and in 2017, the operational period of the LAP was extended until the 8th of December 2022.

7.12 The relevant portion of the subject site is identified for ‘Existing Commercial Development’ within the Cherryhound LAP map.

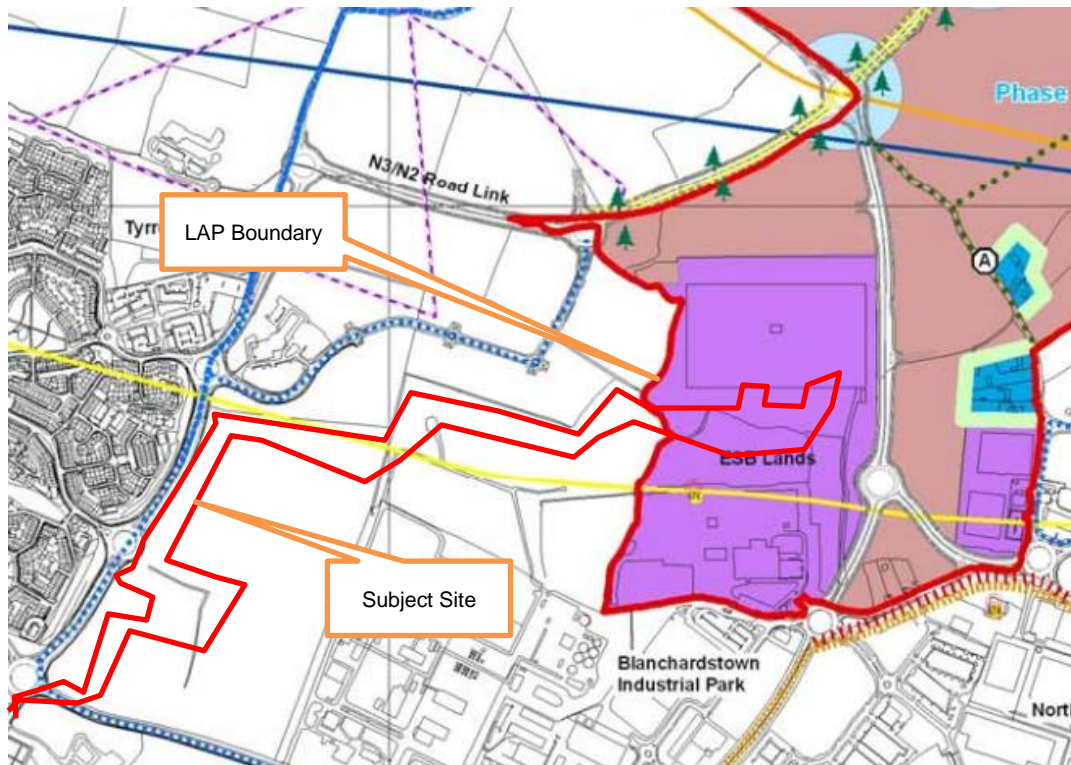


Figure 6: Extract from Cherryhound LAP Map

7.13 Sections 4.4 and 4.4.1 of the LAP document note the strategic location of the LAP lands in terms of access to power and fibre connections. The LAP supports the provision of electrical infrastructure at appropriate locations.

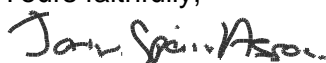
8.0 ENVIRONMENTAL IMPACT ASSESSMENT AND APPROPRIATE ASSESSMENT

- 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 has been prepared by Moore Group, Consultant Ecologists, and is included as an Appendix of the EIAR.

9.0 CONCLUSION

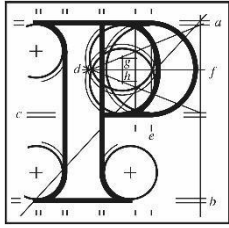
- 9.1 This planning application relates to the provision of a 220kV GIS substation and a double circuit 220kV underground transmission line between the proposed 220kV substation and the existing 220kV and 110kV Corduff substation.
- 9.2 This project is designed to support current power demand and future growth within the Cruiserath area inclusive but not limited to the power requirements for the permitted and future developments within the ADSIL site located at Cruiserath Road and Church Road, Dublin 15.
- 9.3 The proposal is in accordance with the policies and objectives of national and regional planning policy, the Fingal County Development Plan 2017-2023 and the Cherryhound LAP.
- 9.4 It has been demonstrated within this report, as well as within the accompanying drawings, documents, 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 consultations undertaken with An Bord Pleanála and their determination issued prior to the lodgement of this application.
- 9.5 If you require any further information, or clarification on the above, please do not hesitate to contact us.

Yours faithfully,



John Spain Associates

APPENDIX 1: EXTRACT OF BOARD ORDER CONFIRMING THAT THE PROPOSED DEVELOPMENT CONSTITUTES STRATEGIC INFRASTRUCTURE DEVELOPMENT



An
Bord
Pleanála

Board Direction
BD-003777-19
ABP-301430-18

At a meeting held on 14/08/2019, the Board considered the report of the Planning Inspector, as well as the documents and submissions on file, in relation to the proposed development, consisting of a 220kV Gas Insulated Switchgear (GIS) substation and underground double circuit transmission line on lands off Cruiserath Road, Dublin 15 and cablebays in the 110kV/220kV Corduff substation.

The Board determined, in accordance with the Inspector's reasoning and recommendation, that the proposed development, as set out in the plans and particulars received by An Bord Pleanála on the 13th day of April, 2018, as amended by the plans and particulars received by An Bord Pleanála on the 22nd day of July, 2019, falls within the scope of section 182A of the Planning and Development Act 2000, as amended, and that a planning application should be made directly to the Board.

Board Member:

Date: 14/08/2019

Dave Walsh

Appendix 1

The following is a schedule of prescribed bodies considered relevant in this instance for the purposes of Section 182A(4)(b) of the Act.

Minister for Housing, Planning and Local Government

Minister for Communications, Climate Action and Environment

Department of Culture, Heritage and the Gaeltacht

Fingal County Council

Transport Infrastructure Ireland

An Taisce

Heritage Council

Commission for Regulation of Utilities, Water and Energy

Health Service Executive