

The Secretary  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1

Our Ref: 19046

22<sup>nd</sup> March 2021

**Re : Planning and Development Act 2000-2019 and the statutory regulations (as amended). Application by Data and Power Hub Services Ltd. for the demolition of the existing two storey dwelling of Bulmer and associated outbuildings and stable building; and the provision of two no. 110kV transmission lines and a 110kV Gas Insulated Switchgear (GIS) substation compound and Transformers / MV switch room compound along with associated and ancillary works. The site of the proposed development has an area of c. 4.6 hectares, and the proposed development is described as follows: The proposed 110kV GIS Substation and Transformers / MV control room compounds are to be located on lands to the south-east of the Power Generation Facility that was permitted under SDCC Reg. Ref. SD20A/0058 and to the north-west of the concurrent application for 2 no. two storey Information Communication Technology (ICT) facilities each with three storey plant levels and associated ancillary development that will have a gross floor area of 30,518sqm under SDCC Reg. Ref. SD20A/0324, and within an overall landholding bound to the south by the Peamount Road (R120); and on lands that contain the 2 no. residential properties of Little Acre and Bulmer as well as agricultural lands and buildings within the townland of Milltown, Newcastle, Co. Dublin. The proposed demolition of the existing two storey dwelling of Bulmer and associated outbuildings and stable building to the front of the site. The existing Little Acre dwelling and associated buildings are permitted to be demolished under SDCC Reg. Ref. SD20A/0058. The proposed 110kV Gas Insulated Switchgear (GIS) Substation Compound includes the provision of a two storey GIS Substation building (with a gross floor area of 1,430sqm) (known as the Peamount Substation), car parking, lighting, associated underground services and roads within a 3.0m high fenced compound, and all associated construction and ancillary works. The Transformers / MV switch room compound includes three transformers plus MV control room (200sqm), lighting and lightning masts, car parking, associated underground services and roads within a 3.0m high fenced and separate compound, and all associated construction and ancillary works. Two proposed underground single circuit 110kV transmission lines will connect the proposed Peamount 110kV GIS Substation to the existing Castlebaggot-Kilmahud circuit to the east. The proposed transmission lines cover a distance of approximately 940m within the townlands of Milltown and Clutterland. They will pass outside of the site and along and under the following: R120, the former Nangor Road, Griffeen River and the newly realigned Baldonnel Road. The development includes the connections to the proposed Peamount substation as well as to the Castlebaggot-Kilmahud circuit, as well as changes to the attenuation pond and landscaping permitted under SDCC Reg. Ref. SD20A/0058 and all associated construction and ancillary works.**

Dear Sir / Madam,

We, Marston Planning Consultancy, 23 Grange Park, Foxrock, Dublin 18 are instructed by Data and Power Hub Services Ltd. (herein referred to as the 'applicant') 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 Proposed Development for the project as outlined in the Statutory Notice that accompanies this application.

### 1. INTRODUCTION

The Proposed Development comprises:

- The proposed development primarily comprises the demolition of the existing two storey dwelling of Bulmer and associated outbuildings and stable building; and the provision of two no. 110kV transmission lines and a 110kV Gas Insulated Switchgear (GIS) substation compound and Transformers / MV switch

room compound along with associated and ancillary works. The site of the proposed development has an area of c. 4.6 hectares, and the proposed development is described as follows:

- The proposed 110kV GIS Substation and Transformers / MV control room compounds are to be located on lands to the south-east of the Power Generation Facility that was permitted under SDCC Reg. Ref. SD20A/0058 and to the north-west of the concurrent application for 2 no. two storey Information Communication Technology (ICT) facilities each with three storey plant levels and associated ancillary development that will have a gross floor area of 30,518sqm under SDCC Reg. Ref. SD20A/0324, and within an overall landholding bound to the south by the Peamount Road (R120); and on lands that contain the 2 no. residential properties of Little Acre and Bulmer as well as agricultural lands and buildings within the townland of Milltown, Newcastle, Co. Dublin.
- The proposed demolition of the existing two storey dwelling of Bulmer and associated outbuildings and stable building to the front of the site. The existing Little Acre dwelling and associated buildings are permitted to be demolished under SDCC Reg. Ref. SD20A/0058.
- The proposed 110kV Gas Insulated Switchgear (GIS) Substation Compound includes the provision of a two storey GIS Substation building (with a gross floor area of 1,430sqm) (known as the Peamount Substation), car parking, lighting, associated underground services and roads within a 3.0m high fenced compound, and all associated construction and ancillary works. The Transformers / MV switch room compound includes three transformers plus MV control room (200sqm), lighting and lightning masts, car parking, associated underground services and roads within a 3.0m high fenced and separate compound, and all associated construction and ancillary works.
- Two proposed underground single circuit 110kV transmission lines will connect the proposed Peamount 110kV GIS Substation to the existing Castlebaggot-Kilmahud circuit to the east. The proposed transmission lines cover a distance of approximately 940m within the townlands of Milltown and Clutterland. They will pass outside of the site and along and under the following: R120, the former Nangor Road, Griffeen River and the newly realigned Baldonnel Road.
- The development includes the connections to the proposed Peamount substation as well as to the Castlebaggot-Kilmahud circuit, as well as changes to the attenuation pond and landscaping permitted under SDCC Reg. Ref. SD20A/0058 and all associated construction and ancillary works.

The details of the proposed development are discussed at Section 5 of this report and illustrated in the accompanying architectural and engineering drawings.

An Environmental Impact Assessment (EIA) Report has been prepared by Marston Planning Consultancy and other EIA contributors and accompanies this SID planning application submitted to An Bord Pleanála.

The proposed development is designed to enable the export of power from the permitted PGF as granted under SDCC Reg. Ref. SD20A/0058. A Connection Offer has been provided by Eirgrid for the export of power from the permitted PGF to the Castlebaggot-Kilmahud Circuit. The PGF is located to the north-west of the proposed 110kV GIS (Peamount) substation.

The proposed 110kV GIS substation and 110kV transmission lines are also designed to support the power demand for the concurrent application for an ICT facility under SDCC Reg. Ref. SD20A/0324. This may require a separate connection in terms of transmission lines to the National Grid and a separate application to the Board. This concurrent application was subject to a separate planning application and EIA Report and is located to the south-east of the proposed 110kV GIS (Peamount) substation.

The route alignment of the transmission routes has been the subject of discussions and agreement with the relevant landowners / Planning Authority prior to lodgement (see letters of consent submitted herewith from Mrs. Moira Ross; and South Dublin County Council [SDCC]).

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; and
- Data and Power Hub Services Ltd.'s role for this project is to act as the Developer/Applicant.

**Development method**

The development of the proposed Peamount 110kV GIS Substation building and 2 no. underground single circuit transmission lines will be a contestable development. The meaning of this, is the developer will be responsible for the design, construction, fit-out and pre-commissioning of the proposed Peamount 110kV GIS Substation building and the 2 no. underground single circuit 110kV transmission lines to the Castlebaggot – Kilmahud Circuit.

Upon completion of the works by the Developer, the proposed Peamount 110kV GIS Substation building and 2 no. underground single circuit 110kV transmission lines will be handed over to EirGrid, whom in conjunction with ESB Networks (ESBN) will carry out the final commissioning and energisation of the proposed Peamount 110kV GIS Substation and 110kV transmission lines.

Once energised, the proposed Peamount 110kV GIS Substation and the 2 no. underground single circuit transmission lines will form part of the ESBN infrastructure, which EirGrid will be responsible for operating.

**Applicant**

The Applicant is the same as for the Permitted Development where they have been granted permission to build a Power Generation Facility within the wider site. The Applicant has a registered address at 22 The Cubes Offices, Beacon South Quarter, Sandyford, Dublin, D18 HF54.

The main agent acting on behalf of the Applicant is Marston Planning Consultancy Ltd., with an address at 23 Grange Park, Foxrock, Dublin 18.

**2. SITE LOCATION AND CONTEXT**

The Proposed Development is to be located on a site of c. 4.6ha. that consists of two parts. Firstly, within a primarily greenfield site that sits to the north of the Peamount Road (R120) and a site of 1.6 hectares that forms the plots and associated lands of two residential properties known as Little Acre and Bulmer, as well as associated agricultural buildings within the townland of Milltown, Newcastle, Co. Dublin. The second part of the site consists of a linear route that consists of part of the R120, former R134 (Nangor Road), greenfield land and Baldonnel Road. The substation site and its overall site is bounded by the Peamount Road (R120) to the south; a haulage business and further agricultural lands to the west; further agricultural lands to the north; and further agricultural lands and two residential properties that abound the R120 to the east.

The proposed 110kV GIS Substation Compound; and part of the transmission line within the wider substation site to the existing 110kV underground Castlebaggot - Kilmahud circuit are located on lands that at the time of making this application are in private ownership.

The transmission line outside of the wider substation site to the existing 110kV Castlebaggot - Kilmahud circuit to the east is located on lands that include the R120, former R134 (Nangor Road), greenfield land and Baldonnel Road that are in the control or ownership of SDCC. Letters of consent are included within the planning application documentation for the Proposed Development.

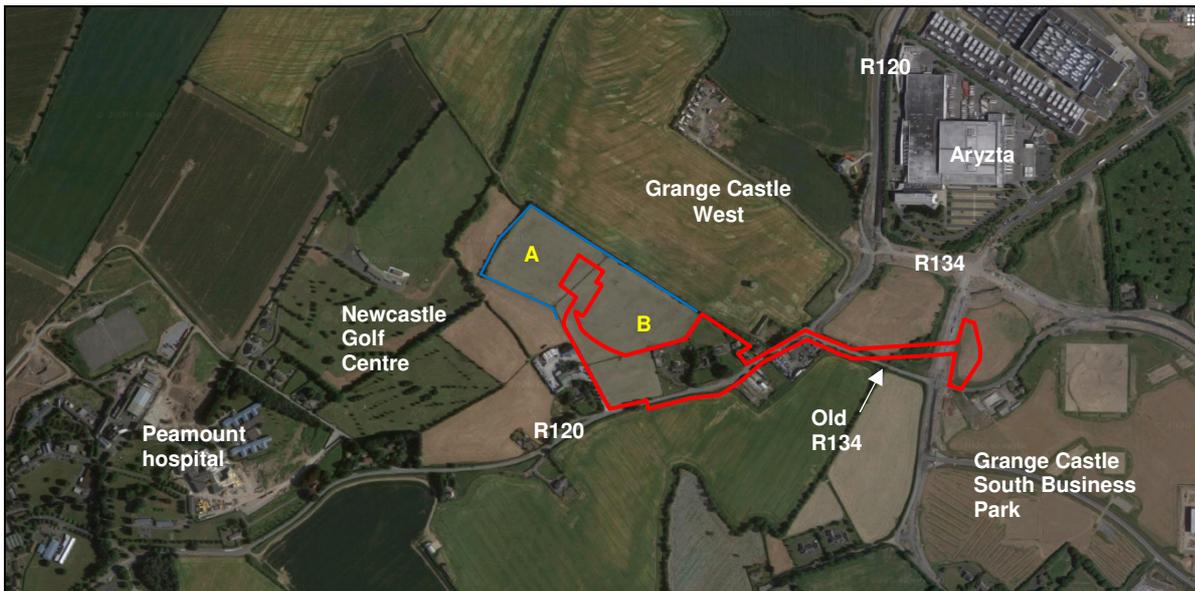
**Proposed 110kV GIS Substation**

The proposed 110kV GIS substation is located on lands that are bounded by the permitted Power Generation Facility (PGF) to the north-west; agricultural lands to the south-west; lands in the ownership of SDCC as part of Grange Castle West to the north-east; and the proposed ICT facility subject to the concurrent application under SDCC Reg. Ref. SD20A/0324 to the south-east..

**110kV transmission line to the Castlebaggot – Kilmahud Circuit**

The route of the underground 110kV transmission line to the Castlebaggot - Kilmahud circuit passes along the permitted internal access road to the PGF granted under SDCC Reg. Ref. SD20A/0058 within the Milltown part of the site before passing under the R120 (Peamount Road) for c. 300m to the north-east to its junction with the former Nangor Road (R134) (now cut off at either end) where it will pass under c. 100m of its length before diverting across SDCC owned land before passing under the culverted Griffeen River (150m) and under the realigned Baldonnel Road to connect to the Castlebaggot-Kilmahud circuit. The length

of the 110kV cable route is c. 940m. A proposed joint bay is to be installed at the connection to the Castlebaggot-Kilmahud circuit as well as along this route.



Proposed Development site outlined in red with the wider PGF (A) and part of ICT (B) site outlined in blue in context of surrounding development and land uses (Source: Google Earth)

The Proposed Development is not located directly adjacent to any areas of national or local environmental sensitivity/designation (Refer to Chapter 6 - Biodiversity for further details). The need for the Proposed Development is described on page 3 of Chapter 1 of the EIA Report.

### 3. PRE-APPLICATION CONSULTATIONS

The Applicant has had 1 no. pre-application consultation meeting with An Bord Pleanála on the 13<sup>th</sup> of November 2020, in response to a pre-application consultation request received by An Bord Pleanála on the 14<sup>th</sup> of October 2020.

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. Consultation has also been undertaken with Eirgrid and ESB Networks to ensure the Proposed Development design meets their requirements. A request to conclude the pre-application process was submitted to An Bord Pleanála on the 30<sup>th</sup> November 2020.

Previously consultation meetings were held with South Dublin County Council as part of the application for the PGF and ICT facility applications in which the Proposed Development was presented as part of future infrastructure development, on the 26<sup>th</sup> September 2019 and 8<sup>th</sup> September 2020.

The EIA contributors/authors have incorporated advice and comments received from South Dublin County Council and ABP into the relevant chapters of this EIA Report.

#### An Bord Pleanála determination

An Bord Pleanála have confirmed in a letter dated the 15<sup>th</sup> of December 2020 that the proposed development constitutes Strategic Infrastructure Development within the meaning of section 182A of the Act.

Therefore, the current application is required to be submitted directly to An Bord Pleanála under section 182A(1) of the Act. 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. RELEVANT PLANNING HISTORY

This section sets out relevant Planning History within the Permitted and Proposed Development site as well as the immediate local area.

##### *Reg. Ref. SD20A/0058*

A Final Grant of Permission was issued on the 17<sup>th</sup> December 2020 (subject to 19 no. conditions) in respect of the following development (for a Power Generation Facility and all associated elements) at the site which is the subject of this planning application that was amended under the Further Information as follows:

*Demolition of the existing single storey house of 'Little Acre' and its associated garage and other buildings; demolition of the single storey stable building on the overall site; construction of a Power Generation Facility within a compound of 14,240sqm that will contain a Power Plant building with up to 7 no. 25m high flues (in 2 no. stacks; combining the individual flues from the engine units). The Power Plant building will house 7 engines and the MV/LV switchgear. The compound will also contain an AGI (Above Ground Installation) gas connection, gas compressor, water tank, water treatment, firewater tank and pumps, fuel skids and fuel tank. The proposed development also includes a battery energy storage system compound of 1,030sqm containing 17 skids including step up transformer, auxiliary power transformer, switchgear container and a total of 35 Inverters. Car parking has been increased to 14 with a turning lane on the Peamount Road, and footpath along the entire length of the frontage of the site.*

The Significant Further Information / Revised Plans included a Visual Impact Assessment; Noise Impact Assessment and Air Quality Assessment as well as other information that addressed the Further Information request of the Planning Authority.

##### *Reg. Ref. SD20A/0324*

This application for an ICT facility on the site to the south-east of the proposed substation was lodged on the 9<sup>th</sup> December 2020. The development was described as including the demolition of the existing two storey dwelling of Bulmer and associated outbuildings; and demolition of the existing single storey house of Little Acre and its associated garage and other buildings; as well as the demolition of the single storey stable building on the overall site; and the construction of 2 no. two storey Information Communication Technology (ICT) facilities each with three storey plant levels and associated ancillary development that will have a gross floor area of 30,518sqm on an overall site of 8.2 hectares.

A request for Additional Information in respect of this application was made on the 11<sup>th</sup> February 2020. The applicant is currently seeking to address this request in a comprehensive manner within a reasonable timescale. Where possible, issues pertaining to matters raised in the Additional Information request we have sought to address under this application also.

As the proposed substation (which is the subject of this application and EIA Report) and the ICT facilities application (Reg. Ref. SD20A/0324) which was accompanied by an EIA Report, will now overlap as a result of the AI request, certain elements of the ICT Facility application are included as part of this planning application and are assessed as part of the planning application and this EIA Report. This includes the demolition of the Bulmer house and associated buildings and farm buildings; as well as the full landscaping planting and berms along the boundary adjacent to the Peamount Road.

#### 5. DESCRIPTION OF THE PROPOSED DEVELOPMENT

The Proposed Development will consist of:

- The proposed development primarily comprises the demolition of the existing two storey dwelling of Bulmer and associated outbuildings and stable building; and the provision of two no. 110kV transmission lines and a 110kV Gas Insulated Switchgear (GIS) substation compound and Transformers / MV switch room compound along with associated and ancillary works. The site of the proposed development has an area of c. 4.6 hectares, and the proposed development is described as follows:
- The proposed 110kV GIS Substation and Transformers / MV control room compounds are to be located on lands to the south-east of the Power Generation Facility that was permitted under SDCC Reg. Ref. SD20A/0058 and to the north-west of the concurrent application for 2 no. two storey Information Communication Technology (ICT) facilities each with three storey plant levels and associated ancillary

development that will have a gross floor area of 30,518sqm under SDCC Reg. Ref. SD20A/0324, and within an overall landholding bound to the south by the Peamount Road (R120); and on lands that contain the 2 no. residential properties of Little Acre and Bulmer as well as agricultural lands and buildings within the townland of Milltown, Newcastle, Co. Dublin.

- The proposed demolition of the existing two storey dwelling of Bulmer and associated outbuildings and stable building to the front of the site. The existing Little Acre dwelling and associated buildings are permitted to be demolished under SDCC Reg. Ref. SD20A/0058.
- The proposed 110kV Gas Insulated Switchgear (GIS) Substation Compound includes the provision of a two storey GIS Substation building (with a gross floor area of 1,430sqm) (known as the Peamount Substation), car parking, lighting, associated underground services and roads within a 3.0m high fenced compound, and all associated construction and ancillary works. The Transformers / MV switch room compound includes three transformers plus MV control room (200sqm), lighting and lightning masts, car parking, associated underground services and roads within a 3.0m high fenced and separate compound, and all associated construction and ancillary works.
- Two proposed underground single circuit 110kV transmission lines will connect the proposed Peamount 110kV GIS Substation to the existing Castlebaggot-Kilmahud circuit to the east. The proposed transmission lines cover a distance of approximately 940m within the townlands of Milltown and Clutterland. They will pass outside of the site and along and under the following: R120, the former Nangor Road, Griffeen River and the newly realigned Baldonnel Road.
- The development includes the connections to the proposed Peamount substation as well as to the Castlebaggot-Kilmahud circuit, as well as changes to the attenuation pond and landscaping permitted under SDCC Reg. Ref. SD20A/0058 and all associated construction and ancillary works.

### **110kV GIS Substation Compound**

The proposed 110kV Gas Insulated Switchgear (GIS) Substation Compound is to be located on lands which are currently greenfield in nature, to the south-east of the Permitted Development granted under SDCC Reg. Ref. SD20A/0058 and within an overall landholding bound to the south by the Peamount Road; by agricultural lands and a haulage company to the west; further agricultural lands to the north; and the proposed Grange Castle West Business Park to the east within Milltown, Co. Dublin.

The proposed 110kV GIS Substation is provided within two compounds. The GIS compound includes the provision of a two storey GIS Substation building (with a gross floor area of 1,430sqm) (to be known as the Peamount Substation) within a 3.0m high fenced compound and all associated construction and ancillary works. The two storey GIS substation building (with a gross floor area of 1,430sqm) will accommodate a cable pit, generator room, workshop, mess room, hoist area, relay room, mess room, generator room and battery room at ground floor level, with a storeroom and substation room at first floor level. The GIS Substation, which is rectangular in shape, is located to the north of the permitted internal access road that will serve it and will be served by 5 no. car parking spaces; and will be located adjacent to the PGF. The 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.

The transformer compound is located to the south of the permitted internal access road and will consist of three transformers, an MV Control Building that is rectangular in form (with a gross floor area of 200sqm), Lighting Masts, and 6 no. car parking spaces. The single storey MV Control Building will accommodate 2 number electrical switch rooms, AUX transition room, relay room, battery room and a control room. The proposed transformers will be located to the west of the MV Control Room, and set out in a row running north-east to south-west parallel to the access road within their compound area. Both the GIS Substation and MV Control Building are finished in metal cladding and are to be accessed off the internal access road proposed to serve the ICT facility. This element of the proposed development is entirely related to the ICT facility and therefore there is no issue of prematurity as this element will not be built unless permission is granted under SDCC Reg. Ref. SD20A/0324.

### **110kV transmission lines to the Castlebaggot substation**

The design of each underground 110kV transmission line will comprise a single 110kV circuit installed underground in high-density polyethylene (HDPE) ducting. The 110kV cables will be a standard XLPE

(cross-linked polyethylene) copper cable. XLPE does not contain oil, therefore there is no risk of migration of oil into the ground in the event of a failure (such as a short circuit, a joint fail, a termination failure etc.). These types of failures would not have the potential to result in a perceptible environmental impact

The installation of the HDPE ducting will require the excavation of one trench along each of the routes; each containing one 110kV circuit. The optimum depth of excavation of the trenches will typically be 1.25m below ground level but may increase at utility crossings. The typical width of each trench is 0.6m, however this may vary depending on ground conditions and the location of existing services. Five separate ducts will be installed in each trench. For the purposes of this assessment, reference to the 'transmission lines' refers to the transmission line to the Castlebaggot - Kilmahud circuit.

Horizontal directional drilling is proposed for a c. 150m length of the 110kV transmission line from the Castlebaggot-Kilmahud circuit. The location of the directional drilling is under the culverted Griffeen River where the 110kV transmission line from the Castlebaggot-Kilmahud circuit crosses under the new Baldonnell Road to the former Nangor Road. The depth of the drilling is expected to be c. 9.65m in depth and will require four separate directional drillings that will be c. 2.5m apart.

The ducting, bedding, surrounding fill material, warning marker boards and tape will be installed as per design in accordance with Eirgrid specification while maintain safe clearance from existing utilities. Chambers and sandpits to be installed as per design in accordance with Eirgrid specifications. Trench will be backfilled with suitable material and surface finishes will be returned to original state.

### **Associated / Ancillary Works**

The internal road system will be completed as part of the Permitted Development under SD20A/0058. Landscaping will be undertaken in accordance with the Permitted Development's landscape plan, and as supplemented under this application that mirrors the changes proposed under the concurrent application along Peamount Road. The permitted and proposed landscaping scheme to the west, east and south of the Substation will be in place within the first planting season following the completion of this Substation in summer 2023.

## **6. NATIONAL AND REGIONAL POLICY CONTEXT**

### ***National Planning Framework***

The National Planning Framework (NPF) was published in February 2018 setting out a vision for Ireland in land use and planning terms to 2040. The NPF replaced the National Spatial Strategy once it was adopted as the long term land use and planning vision for Ireland.

National Strategic Outcome 6 of the NPF relates to the creation of "*A Strong Economy Supported by Enterprise, Innovation and Skills*". This strategic outcome is underpinned by a range of objectives relating to job creation and the fostering of enterprise and innovation. The following objective, relating to Information and Communications Technology (ICT) infrastructure (including datacentres) is included under National Strategic Outcome 6:

*"Promotion of Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities."*

The Proposed Development comprises a substation and associated ancillary development designed to support power generation to the National Grid and the power demand for ICT and surrounding future development. A full description of the Proposed Development is available in Chapter 2 Description of the Proposed Development.

The Proposed Development comprises the provision of infrastructure that will facilitate the export of power to the National Grid and has been designed to provide power supply for the concurrent ICT facility application, in a location which is well suited and serviced to accommodate such a use. The NPF also states under National Strategic Outcome 5, A Strong Economy Supported by Enterprise, Innovation and Skills :

*"Ireland is very attractive in terms of international digital connectivity, climatic factors and current and future renewable energy sources for the development of international digital infrastructures, such as data storage*

facilities. This sector underpins Ireland's international position as a location for ICT and creates added benefits in relation to establishing a threshold of demand for sustained development of renewable energy sources."

The NPF is favourably disposed to the location of ICT infrastructure in Ireland, and the Proposed Development, which comprises of such ICT infrastructure, is therefore considered to be wholly in accordance with this key body of national planning policy.

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

The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Regional Assembly (EMRA) includes Regional Policy Objective (RPO) 8.25 which states the following:

*"Local Authorities shall:*

- *Support and facilitate delivery of the National Broadband Plan.*
- *Facilitate enhanced international fibre communications links, including full interconnection between the fibre networks in Northern Ireland and the Republic of Ireland.*
- *Promote and facilitate the sustainable development of a high-quality ICT network throughout the Region in order to achieve balanced social and economic development, whilst protecting the amenities of urban and rural areas.*
- *Support the national objective to promote Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities at appropriate locations.*
- *Promote Dublin as a demonstrator of 5G information and communication technology"*

The site is therefore considered to be an appropriate location for the development of data centres and associated ancillary development under this Strategy.

The RSES recognises the need to facilitate the provision of sufficient electricity to meet increasing demand in the region. In terms of Energy Infrastructure it is noted that 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."*

The proposed development constitutes a transmission project which is required to serve the electricity needs of permitted and potential future development in the Grange Castle South Business Park in accordance with the foregoing objective.

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."*

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.



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.”*

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 EIA Report). The design selected has been predicated on the need to minimise environmental impact and includes mitigation measures as set out within the EIA Report 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 or built-up urban areas.

## 7. LOCAL PLANNING CONTEXT

### ***South Dublin County Development Plan 2016-2022***

The South Dublin County Development Plan is the statutory planning document that covers the entire South Dublin administrative area. The Plan was adopted in June 2016. The Proposed Development is to be located within an area zoned EE (Enterprise and Employment) under the County Development Plan with the stated aim:

*“To provide for enterprise and employment related uses.”*

The Proposed Development is required to facilitate the export of power to the National Grid from the PGF that received its Final Grant of permission on the 17<sup>th</sup> December 2020 under SDCC Reg. Ref. SD20A/0058. The Proposed Development is also required to provide permanent power to the ICT facility that forms a concurrent application under SDCC Reg. Ref. SD20A/0324, and is currently subject to an Additional Information request from the Planning Authority.

The County Development Plan (s. 10.2.9 supports the provision of transmission and energy infrastructure with the appropriate service providers such as ESB Networks and Eirgrid that facilitates the economic development and expansion of the County. Energy (E) Policy 11 of the County Development Plan specifically states that *“It is the policy of the Council to ensure that the provision of energy facilities is undertaken in association with the appropriate service providers and operators, including ESB Networks, Eirgrid and Gas Networks Ireland. The Council will facilitate the sustainable expansion of existing and future network requirements, in order to ensure satisfactory levels of supply and to minimise constraints for development”*. The service providers and operators have been fully consulted in formulating this SID application and the applicant is in receipt of an offer from Eirgrid to facilitate the export of power from the permitted development to the National Grid.

Significant precedent exists for the establishment of this use on other EE zoned lands in the area. EE zoned areas are established economic industrial areas running essentially in an arc northwards from City West to Grange and Grange Castle.

It is the policy of the Council to support sustainable enterprise and employment growth in South Dublin and in the Greater Dublin Area, whilst maintaining environmental quality. A number of objectives relate to EE zoned lands that include ET3 Objective 2 that states:

*“To prioritise high tech manufacturing, research and development and associated uses in the established Business and Technology Cluster to the west of the County (Grange Castle and Citywest areas) to maximise the value of higher order infrastructure and services that are required to support large scale strategic investment.”*

Policy ET3 Objective 5 requires that *“all business parks and industrial areas are designed to the highest architectural and landscaping standards and that natural site features, such as watercourses, trees and hedgerows are retained and enhanced as an integral part of the scheme”*. The Proposed Development retains and enhances natural site features by the use of the highest architectural and landscaping design standards.

Policy ET3 Specific Local Objective 1 supports the conducting of a review of the zoning of lands south of the Grand Canal and west and north of the R120, with a view to preparing a long term plan for the expansion of the Grange Castle Economic and Enterprise Zone, to accommodate strategic investment in the future, while also seeking to provide public open space along the Canal, including a natural heritage area in the vicinity of the historic canal quarries at Gollierstown. This rezoning has formed Variation no. 1 of the County Development Plan and does not relate to these lands.

The nature of the Permitted Development was informed by a site analysis of environmental issues and individual environmental reports were prepared and submitted with the application for development under SDCC Reg. Ref. SD20A/0058, and the concurrent application under SDCC Reg. Ref. SD20A/0342. This included noise and air quality objectives. The enhancement and creation of new bio-diversity corridors to fully integrate the Permitted and Proposed Development into the surrounding environment will ensure that direct and cumulative effects on biodiversity are addressed in the overall design. Suitable attenuation and sustainable drainage systems have also informed the design of both the Permitted and Proposed Development as well as the concurrent application. This mitigation of design also increases native tree planting within the site from its current position. The Permitted Development incorporates SUDS fully in accordance with policies of the Plan.

In conclusion it is considered that the Proposed Development is in accordance with the policies and objectives of local, regional and national land use planning policy.

## **8. ENVIRONMENTAL IMPACT ASSESSMENT REPORT**

An Environmental Impact Assessment Report has been prepared / coordinated by Marston Planning Consultancy and is submitted along with this application.

## **9. APPROPRIATE ASSESSMENT**

An Appropriate Assessment Screening Report has been prepared by Scott Cawley and is submitted along with this application, and is included as a stand-alone document that accompanies the application.

## **10. FLOOD RISK ASSESSMENT**

A Stage 1 Flood Risk Assessment has been undertaken for the site by JB Barry, Consulting Engineers and is submitted along with this application, and is included as a stand-alone document that accompanies the application.

## **11. CONCLUSION**

The Proposed Development is designed to enable the export of power from the Power Generation Facility (PGF) to the National Grid. This connection has been granted and accepted by Eirgrid. The proposed

substation is also designed to provide a permanent power supply for the ICT facilities, if granted, that is subject to the concurrent application, and a request for Additional Information, under SDCC Reg. Ref. SD20A/0324. The same infrastructure, or part thereof, will be used to provide power to the ICT facilities.

The Proposed Development is designed to facilitate the export of power from the Permitted Development to the National Grid within the Greater Dublin Area where there is a recognised constraint in the National Grid. The development is designed to support the future growth within the area, and will not provide back-up or permanent power to the ICT Facility. This site is well suited and serviced to accommodate such a use and will facilitate the development of Grange Castle West Business Park.

The proposal is in accordance with the policies and objectives of national and regional planning policy, and the South Dublin County Development Plan 2016-2022.

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.

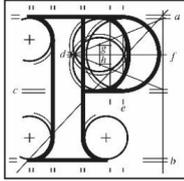
If you require any further information, or clarification on the above, please do not hesitate to contact us. We trust that everything is in order and look forward to a favourable decision in due course.

Yours faithfully,



Anthony Marston (MIPI, MRTPI)  
**Marston Planning Consultancy**

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



**An  
Bord  
Pleanála**

**Board Direction  
BD-007178-20  
ABP-308439-20**

At a meeting held on 15/12/2020, the Board considered the report of the Inspector and the documents and submissions on file generally.

Having regard to the provisions of the Planning and Development Act 2000, as amended, and the nature of the proposed development which consists of a 110kV GIS substation and associated works at Milltown, Peamount Road, Newcastle, County Dublin, as set out in the plans and particulars received by An Bord Pleanála on the 14<sup>th</sup> day of October 2020, it is considered that the proposed development falls within the scope of section 182A of the Planning and Development Act 2000, as amended, and is therefore strategic infrastructure within the meaning of the Act and that a planning application should be made directly to the Board.

**Board Member:**

**Date:** 15/12/2020

\_\_\_\_\_  
Dave Walsh