

6.0 PLANNING POLICY

6.1 INTRODUCTION

This chapter of the EIAR sets out the regional and local planning policies and objectives that are relevant to the proposed Baldonnell 110KV substation and its associated grid connection (hereafter referred to as the proposed development) and demonstrates how the proposed development will be consistent with and contribute towards the achievement of same. Relevant spatial planning objectives and the relevant planning history of the surrounding area is also analysed.

6.2 EUROPEAN AND NATIONAL POLICY CONTEXT

It should be noted that the European and National policy framework which establishes the need and overall development context for the proposed substation and associated gas fired power plant is already provided in Chapter 3.

The European policy context includes:

- European Green Deal;
- A Clean Planet for all: A European strategic long-term vision for a prosperous, modern, competitive and climate neutral economy (2018);
- Europe 2030 Climate and Energy Framework; and
- Renewable Energy Directive 2009/28/EC & 2018/2001/EU.

The national policy context includes:

- Ireland 2040 - Our Plan (National Planning Framework) [2018];
- National Development Plan 2021-2030;
- Government White Paper – Ireland’s Transition to a Low Carbon Energy Future 2015-2030;
- Climate Action Plan 2023;
- DS3 Programme;
- Strategy 2020-25 Transform the power system for future generations;
- East Coast Generation Opportunity Assessment (EirGrid, February 2019);
- Shaping our Electricity Future Roadmap (2021); and
- Generation Capacity Statement 2022-2031;
- Government Statement on the Role of Data Centres in Irelands Enterprise Strategy (2018).

6.3 REGIONAL POLICY CONTEXT

6.3.1 Regional Spatial and Economic Strategy for the Eastern and Midland Region

The Greater Dublin Area was amalgamated within the Eastern and Midland Regional Assembly (EMRA) as of January 2015. One of the principal functions of the Assembly is to deliver a Regional, Spatial and Economic Strategy (RSES) which considers both spatial and economic factors within the regional planning framework. The principal statutory purpose of the RSES for the Eastern and Midland Region is to support the implementation of the Ireland 2040 NPF / NDP and the economic policies and objectives of the Government. Specifically, the RSES will provide a range of plans and strategies relevant to the Ireland 2040 NPF / NDP.

The RSES sets out a Vision Statement which is underpinned by three key cross-cutting principles which best reflect the challenges and opportunities of the Region: healthy placemaking; climate action; and economic opportunity.

To create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all.

The RSES contextualises the Eastern and Midland Region as the ‘*economic engine of the State*’ providing more than 1 million jobs. Specifically, Dublin and its Environs is a global hub for international investment and high value jobs in ICT, financial and business services with local enterprise and small and medium sized enterprises (SMEs) also providing vital employment opportunities. Consequently, the region contains some of the fastest growing communities in the country which has increased demand for housing, infrastructure and services in those areas. As such, the RSES states that a key growth enabler for the Dublin is to:

‘Support the future success of Dublin as Ireland’s leading global city of scale by better managing strategic assets to increase opportunity and sustain national economic growth and competitiveness’

The RSES includes a Dublin Metropolitan Area Strategic Plan (MASP) which identifies a number of Guiding Principles for the sustainable development of the Dublin Metropolitan Areas which includes the site of the gas fired power plant and associated proposed development. Of particular relevance, the MASP notes the need to promote quality infrastructure provision and capacity improvement, in tandem with new development and aligned with national projects and improvements in sustainable energy and resource efficiency.

According to the RSES, the Dublin and Eastern Regions are a major load centre on the Irish electricity transmission system; specifically, approximately one third of total electricity demand is located in these regions. Having regard to projected population and economic growth in the eastern region, the RSES notes that the increasing demand for electricity in the region must be addressed in a way which balances the need for a significant shift towards renewable energy and enabling resources to be harnessed in a manner consistent with the principles of proper planning and sustainable development.

- Facilitating the provision of appropriate renewable energy infrastructure and enabling technologies;
- Expansion and upgrading of the grid with the aim of increasing the share of variable renewable electricity;
- Moving from carbon intense fossil fuel generation to lower emissions fuels such as natural gas; and
- The need to ensure sufficient electricity to meet increased demand.

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.

The following Regional Policy Objectives outlined below ensure that the development of the energy network is undertaken in a safe and secure way which meets the projected demand levels, Government Policy and the need to achieve a long-term, sustainable and competitive energy future for Ireland:

- RPO 10.20: 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;
- RPO 10.22: Support the reinforcement and strengthening of the electricity transmission and distribution network to facilitate planned growth and transmission/distribution of a renewable energy focused generation across the major demand centres to support an island population of 8 million people; and
- RPO 10.23: Support EirGrid’s Implementation Plan 2017-2022 and Transmission Development Plan (TDP) 2016 and any subsequent plans prepared during the lifetime of the RSES that facilitate the timely delivery of major investment projects subject to appropriate environmental assessment and the outcome of the planning process.
- RPO 7.35: EMRA shall, in conjunction with local authorities in the Region, identify Strategic Energy Zones as areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas. The Strategic Energy Zones for the Region will ensure all environmental constraints are addressed in the analysis. A regional landscape strategy could be developed to support delivery of projects within the Strategic Energy Zones.
- RPO 8.25: Local authorities shall:
 - 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.

As described within this EIAR, the proposed development is consistent with the above objectives.

6.4 LOCAL POLICY CONTEXT

6.4.1 Policy & Objectives Overview

The proposed Baldonnell Substation will be located within the functional area of South Dublin County Council and is therefore subject to the South Dublin County Council Development Plan 2022-2028 hereafter referred to as the CDP.

Noting the overall context and purpose of the proposed development to export electricity from the adjacent gas fired power plant to the wider transmission network, this section of the chapter will set out policy and objectives relevant to the delivery of electricity infrastructure, renewable energy, and employment and enterprise.

A vision of the CDP is to “Deliver a green society and circular economy adaptable to new technologies, a home and place of employment for people and industries striving towards reducing their carbon footprint.”

Chapter 10 of the CDP deals with Energy and states that South Dublin Council will “continue to make every effort to increase energy efficiency and unlock renewable energy potential in the County.”

The CDP seeks to promote policy to ameliorate the effects of climate change by making Dublin a climate resilient region by reducing the impacts of future climate change related events.

Specifically, with respect to Electricity Infrastructure, the CDP states:

“In line with government policy, the development of energy networks in a safe and secure way to meet projected demand levels and to ensure a long-term, sustainable and competitive energy future for Ireland will be critical to our economy and to enabling the relevant grid connections for renewable energy.”

Within this context, the following objectives and policies are provided within the CDP and are of relevance to the proposed substation:

- Policy IE6 Electricity Infrastructure: Protect the existing electricity infrastructure and support the development of a safe, secure and reliable supply of electricity and the development of enhanced electricity networks as well as new transmission infrastructure projects subject to the relevant environmental assessments.
- IE6 Objective 2: To support the reinforcement and strengthening of the electricity transmission and distribution network to facilitate planned growth and transmission /distribution of a renewable energy focused generation in line with RPO 10.22.
- IE6 Objective 4: To ensure that the design of energy networks achieves the least possible environmental impact and that where such impacts are inevitable, they are mitigated to the greatest possible extent.

Energy objectives and policies provided within the CDP to support this vision objective are:

- E2 Objective 1: To seek to reduce the reliance on fossil fuels in the County by reducing the energy demand of existing and new development.
- E2 Objective 3: To promote the generation and supply of low carbon and renewable energy alternatives, having regard to the opportunities offered by the settlement hierarchy of the County and the built environment.

The CDP recognises Grange Castle Business Park as “a modern business park located in the west of the County with capacity to attract large scale industries of regional, national and international significance, due to the availability of large plot sizes, infrastructure and corporate park style environments.” The areas have “attracted a significant number of blue-chip national and multi-national corporations. Significant investment has been made over the past two decades in infrastructure and services to support these economic areas. Grange Castle Business Park is identified in the MASP as a strategic development area for the promotion of high-tech manufacturing, research and development.”

The concentration of ‘clusters’ of industries is recognised as a vital part of economic development policy driving investment within South Dublin County Council. As such, the CDP seeks to:

- EDE5 Objective 1: To prioritise hi-tech manufacturing, research and development and associated uses in the established Business and Technology clusters to the west of the County (Grange Castle and Citywest areas) maximising the value of higher order infrastructure and services that are required to support large scale strategic investment.
- EDE1 Objective 3: To ensure that there is a sufficient supply of zoned and serviced lands at suitable locations to accommodate a range of enterprise and employment development types and to promote compact growth by strengthening the integration between employment, housing and transportation.

The CDP acknowledges that “Dublin is one of the fastest growing data centre markets in Europe with a significant element of this growth in South Dublin County Council”

Categorised as “space extensive land uses” under the CDP, the CDP recognises that data centres can have a high carbon footprint. This is due to the “large amount of energy demanded by them.”

6.4.2 Land Use Zoning

The CDP sets out a range of land use zoning objectives within South Dublin County Council in order to promote the orderly development of the County by eliminating potential conflicts between incompatible land uses and to establish an efficient basis for investment in public infrastructure and facilities.

The application site is situated within land designated as “Employment and Enterprise” under the CDP. The objective of ‘Enterprise and Employment (EE)’ Zoning is to provide for enterprise and employment related uses.

Land Use Classes identified as ‘Permitted in Principle’ within EE zones include, Public Services, which is further defined as:

“A building or part thereof or land used for the provision of public services. Public services include all service installations necessarily required by electricity, gas, telephone, radio, telecommunications, television, drainage and other statutory undertakers, it includes public lavatories, public telephone boxes, bus shelters, bring centres, green waste and composting facilities.”

The proposed substation is consistent with EE zoning objectives and furthermore, sympathetic to the overall development strategy of the surrounding environment as envisioned in the CDP.

The precedence for the siting of a gas fired power plant and associated infrastructure such as the proposed substation is well established within this zoning given the following grant of approvals:

- 96MW Peaker Power Plant at Grange Castle Business Park, Clondalkin, Dublin 22, 1.56km north of the site (Reg. Ref.: SD15A/0061 & SD16A/0398);
- Gas power plant development within the townland of Milltown (Reg. Ref.: SD20A/0058);
- Temporary gas-powered generation plant at Newcastle Road, Lucan, Co Dublin, 1.82km northwest of the site (Reg. Ref.: SD19A/0042);
- Temporary provision of 18MW gas powered electricity generator compound at Grange Castle Business Park, approximately 560m northwest of the site (Reg. Ref.: SD17A/0318);
- Temporary provision of gas-powered generation plant permitted under (Reg. Ref.: SD20A/0031) at Grange, Newcastle Road, 1.75km northwest of the site; and
- Reg. ref.: SD20A/0283 provides for the construction of a data centre and administrative buildings including the provision of a gas generator compound.

6.4.3 Planning History of Application site and Environs

Power generation, transmission and general industry/ commercial activities have long been established within the application site and surrounding area. A summary of the relevant planning history of the application site and surrounding environs is provided hereunder.

There are three planning applications overlapping the boundary of the site relating to the provision of the original business park:

- Provision of roads and services infrastructure to facilitate a business park (Reg. Ref.: SD06A/0568 & SD06A/0568 EP)
- Provision of a Trade Park consisting of 35 units in 5 separate blocks (Reg. Ref.: SD07A/0665)

The associate gas fired power plant received planning approval under application Reg. Ref.: SD21A/0167.

The majority of commercial planning applications within the last 5 years have been clustered north and south of the R134 within Grange Castle Industrial Park and on lands zoned 'Enterprise and Employment'. These applications generally consist of data centres with administrative office and associated infrastructure such as backup generator units, substations, and flue stacks, as well as warehouse infrastructure and bi-pharma manufacturing facilities:

- Construction of peaking power plant (Reg. Ref.: SD15A/0061 & SD16A/0398)
- Construction of telecommunications infrastructure (Reg. Ref.: SD16A/0113)
- Construction of data centres:
 - (Reg. Ref.: SD16A/0345, SD17A/0027 & SD19A/0342)
 - (Reg. Ref.: SD19A/0042, SD19A/0004)
 - Reg. Ref.: SD17A/0141 & SD17A/0392, SD18A/0298, SD20A/0031)
 - (Reg. Ref.: SD15A/0343, SD16A/088, SD20A/0283)
 - (Reg. Ref.: SD16A/0176, SD16A/0214)
 - (Reg. Ref.: SD17A/0377)
 - (Reg. Ref.: SD18A/0134)
 - (Reg. Ref.: SD18A/0323)
 - (Reg. Ref.: SD12A/0002/EP)
 - Reg. Ref.: SD18A/0314, SD19A/0408, SD20A/0295)
 - (Reg. Ref.: SD20A/0121)
 - (Reg. Ref.: SD21A/0042)
 - (Reg. Ref.: SD21A/0241)
- Construction of gas-powered plant & data hall (Reg. Ref.: SD20A/0058 & SD20A/0324);
- Provision of temporary gas-powered electricity generator (Reg. Ref.: SD17A/0318)
- Construction of above ground natural gas pressure reduction unit relief stack (Reg. Ref.: SD18A/0096 & SD18A/0269)
- Applications involving the provision of a substation:
 - (Reg. Ref.: SD19A/0300)
 - (Reg. Ref.: PL06S.VA0019)
 - (Reg. Ref.: PL06S.308585)
 - (Reg. Ref.: PL06S.309146)
 - (Reg. Ref.: PL06S.309773)
- Construction of bio-pharmaceutical facilities & laboratories:
 - (Reg. Ref.: SD16A/0236)
 - (Reg. Ref. : SD13A/0186, SD15A/0243, SD15A/0352, SD16A/0250)
 - (Reg. Ref.: SD17A/0019)
 - (Reg. Ref.: SD17A/0192)
 - (Reg. Ref.: SD17A/0354)
 - (Reg. Ref.: SD20A/0147)
- Other miscellaneous applications include:
 - Permission for Car Sales Show room (Reg. Ref.: SD17A/03540)

- Permission for warehousing and ancillary office (Reg. Ref.: SD18A/0314, SD19A/0153, SD19A/0322, SD20A/0124, SD20A/0187, SD18A/0126, SD21A/0051)

The only residential development consented within the last 5 years within proximity of the proposed substation has been a Strategic Housing Development (Reg. Ref.: ABP-305267-19), which has obtained permission in 2019 for the construction of 1034 residential units and 2no. childcare facilities, 1 retail unit and 1 community facility. This development would be located 1.23km east of the site. Other applications for residential development in the wider area include:

- Part 8 development to construct Rapid Build Social Housing Project (Reg. Ref.: SD168/0007)
- Part 8 development for construction of 109 residential units (Reg. Ref.: SD178/0002)

Neighbouring Proposed Kilcarbery Substation - It is noted that an application for planning permission for the construction of a 110kV Gas Insulated Switchgear (GIS) Substation compound and 110kV transmission lines along with associated and ancillary works has been lodged with An Bord Pleanála (Reg. Ref.: VA06S.312793) and is currently pending consideration.

The application process for the associated and approved Gas Fired Power Plant has cumulatively assessed application VA06S.312793 with the assessments under this EIAr doing the same.

6.5 PLANNING CONCLUSIONS

The proposed Baldonnell Substation, its grid connection, and the associated power plant at Profile Park is considered consistent with the overarching planning framework set out in the above European, national, regional and local policies and plans. The rationale for this conclusion is based on the following:

European

- Ireland will miss the target set for the period 2013 to 2020 for renewables by about 3% and for cumulative emissions by a little under 5%. Furthermore, EPA's Greenhouse Gas Emissions 2018-2040 projections indicate that Ireland faces significant challenges in meeting EU 2030 reduction targets in the non-ETS sector and national 2050 reduction targets, particularly in electricity generation. Ongoing review and refinement of the national transmission, including the implementation of support / enabling infrastructure such as the proposed substation as part of the associated gas fired power plant, will allow Ireland to continue to invest in renewable sources of power to meet future national and EU targets.

National

- Due to the significant growth in demand for electricity, the national grid will require new solutions such as the proposed substation and associated gas fired power plant. The long-term renewal of the grid will need to be consistent with wider national, social, environmental, economic and energy policies, i.e., renewable energy targets and sustainability. Operation of the proposed substation will assist in regularising energy provision in the electricity grid. Specifically, the associated gas fired power plant would have the ability to respond quickly to the peaks and troughs of renewable generators, so providing electricity at times of high demand and low wind. This will assist in delivering a secure and sustainable electricity system.

Regional

- The RSES contextualises the Eastern and Midland Region as the '*economic engine of the State*' providing more than 1 million jobs, and as such, are a major load centre on the Irish electricity transmission system. Developing the electrical grid in the Region will enable the transmission system to safely accommodate more diverse power flows from renewable generation. Grid investment, and flexible power generation in the form of the power plant, will solve immediate infrastructural deficiencies in addition to accommodating expected long-term growth in population and economic development. Greater integration of renewable energy will ensure grid capacity to meet growing commercial demand such as high technology industries including data centres.

Local

- The policies and objectives contained within the CDP establish a clear precedence for the proposed substation due to the benefits and opportunities of dispatchable grid services, that will be facilitated.
- The proposed substation will be located within land zoned Enterprise and Employment.
- The precedence for the siting of gas fired power plants and associated infrastructure such as the proposed substation, is well established at this location in Profile Park, given the approval of similar development within the same zoning.