



An
Bord
Pleanála

Record of Meeting ABP-319546-24

Case Reference / Description	Proposed development of a battery storage facility and associated 110kV electrical cable connection. Within the townland of Logdewood, Co. Wexford		
Case Type	Pre-application consultation		
1st / 2nd / 3rd / 4th Meeting	1 st Meeting		
Date	11 th July 2024	Start Time	2:30pm
Location	MS Teams	End Time	3:35pm

Representing An Bord Pleanála
Paul Caprani (Assistant Planning Director) Chair
Barry O'Donnell (Senior Planning Inspector)
Ellen Moss (Executive Officer)
Aisling Reilly (Executive Officer) (Observer)

Representing the Prospective Applicant
Alice Power (Statkraft)
Donal Murphy (Statkraft)
Rory Griffin (Statkraft)
Danilo Griffin (Statkraft)
Tom Birney (Statkraft)
Shane Howard (MWP)
Caitriona Fox (MWP)

Introduction

The Board referred to the letter received from the prospective applicant on the 18th April 2024, requesting pre-application consultations under section 182E of the Planning and Development Act 2000, as amended, and advised the prospective applicant that the instant meeting essentially constituted an information-gathering exercise for the Board; it also invited the prospective applicant to outline the nature of the proposed development and to highlight any matters that it wished to receive advice on from the Board. The Board's representatives mentioned the following general procedures in relation to the pre-application consultation process:

- The Board will keep a record of this meeting and any other meetings, if held. Such records will form part of the file which will be made available publicly at the conclusion of the process. The record of the meeting will not be amended by the Board once finalised, but the prospective applicant may submit comments on the record which will form part of the case file.
- The Board will serve notice at the conclusion of the process as to the strategic infrastructure status of the proposed development. It may form a preliminary view at an early stage in the process on the matter.
- A further meeting or meetings may be held in respect of the proposed development.
- Further information may be requested by the Board and public consultations may also be directed by the Board.
- The Board may hold consultations in respect of the proposed development with other bodies.
- The holding of consultations does not prejudice the Board in any way and cannot be relied upon in the formal planning process or in any legal proceedings.

Presentation made by the prospective applicant:

The prospective applicant began their presentation by briefly discussing the overview of the proposed development. The proposed development would comprise a Battery Energy Storage System facility, with an associated substation consisting of a low-voltage operations compound and a high-voltage underground grid connection to the existing 110/220kV Lodgewood Substation.

The prospective applicant provided information in relation to the proposed site location. The proposed site is located in the townland of Lodgewood in County Wexford on unzoned rural lands. The proposed site is circa 2km southwest of Ferns town and immediately east of the existing Lodgewood substation.

The proposed development site is on circa 9.3ha of greenfield land currently used for agriculture. Site access would be facilitated by upgrading the existing agricultural site entrance and access road from the L5130 local roadway located to the east of the proposed development site.

The proposed development would comprise of the following components:

- Battery Energy Storage System (BESS) facility consisting of battery containers with HVAC units, transformers, inverters, underground cabling, associated control rooms, and internal access routes.
- The associated substation would consist of a low voltage operations compound including a single storey control and operational building, electrical plant, cabling, lighting, CCTV, lighting masts, diesel generator and diesel tank, operations and maintenance containers and stores. The adjoining High Voltage electrical yard would comprise of outdoor electrical plant and associated compound.
- Underground High Voltage grid cables (110kV or 220kV) connecting to the existing 110/220kV Lodgewood Substation and

- Upgraded entrance and access road to the site from the L5130.

The prospective applicant presented an indicative proposed development layout. The BESS facility would occupy the majority of the site. The southwestern part of the site would be dedicated to the proposed operations compound and high-voltage electrical compound. The BESS facility would be configured to be contained within 7-9 main block groupings which would have a potential storage capacity of 120-200MWs of energy.

The prospective applicant advised that the exact battery technology will be subject to a competitive procurement process that can only commence following a grant of planning permission. It is unlikely that details of the layout, the exact number of battery units and the export/import voltage levels will be confirmed at the time of submitting the proposed application. It is therefore intended to seek a Design flexibility meeting with the planning authority if the Board confirm that this element of the proposal does not constitute SID. A design flexibility meeting will be sought under Part 3A Section 15J of the Planning and Development Regulations 2001 as amended.

The prospective applicant presented three options for the indicative potential development layout and also presented the three options in a merged drawing.

The prospective applicant advised on the purpose of the proposed development. The purpose of the proposed development is to deliver energy management services to support the stability of the National Grid by providing storage of any excess energy that is generated by the national grid and releasing the energy back to the grid when demand is greater. The prospective applicant acknowledged that the proposed development would support resiliency and sustainability objectives at local and

national levels by reinforcing the National Grid transmission network if the proposed development is granted permission.

Discussion:

The Board's representatives began the discussion by raising the issue of EIA Screening, with particular reference to the creation of a 'private road' and 'rural restructuring' (hedgerow removal and land recontouring). The prospective applicant was advised that an EIA screening should accompany any application and that consideration should be given to applicable classes and thresholds when developing a proposed site layout.

The Board's representatives discussed the issue of site access, identifying that there appears to be alternative means of access, via either the existing Lodgewood substation site or via an approved substation site to the south that includes its own dedicated access road, each of which would avoid the need to create a long access route. The prospective applicant advised that they require permission from the respective landowners to access via third-party lands and that it is preferable to upgrade their own private access road. The Board's representatives requested that the prospective applicant clarify, as part of any application, the length of the hedgerow to be removed and the length of the proposed access route. It was further advised that hedgerow removal should be avoided where possible.

The Board's representatives advised that the Slaney River SAC site is c.1.4km from the site and that it is at 'High' risk from diffuse pollution arising from forestry activities and from the spread of invasive species. An NIS may be required as part of any application, with an emphasis on mitigation that would avoid pollution/contamination of receiving surface waters. It was also suggested that an ecological/invasive species walkover survey should accompany any application.

Regarding landscape and visual impacts, the Board's representatives advised that there are extant planning permissions for substantial development in the surrounding area, including a large solar farm and a substation development. The prospective applicant was advised that any application should include a landscape and visual assessment, with particular emphasis on cumulative impacts.

Regarding archaeology, it was noted by the Board's representatives that there are multiple recorded monuments in the vicinity of site, particularly to the east and west. The prospective applicant was advised that an application should be accompanied by an archaeological assessment and that it would be advisable to engage with the Department of Housing, Local Government and Heritage regarding its scope.

The prospective applicant queried if Design Flexibility would be required for the underground cables and BESS facility. The Board's representatives advised that design flexibility would not be required for the underground cables and that the prospective applicant could apply for both options as part of an application, with both options evaluated and assessed individually as part of any documentation submitted. The Board's representatives advised that the planning authority would best-advise on Design Flexibility in relation to the BESS facility, if the Board determine that this element of the proposed development does not constitute SID.

With further reference to Design Flexibility, the Board's representatives mentioned that the Planning and Development Act 2000, as amended, requires plans and particulars be submitted with an application and that each potential BESS layout option should be fully assessed in the particulars submitted. This advice is in the context of recent case law, which has found that it is insufficient to rely on a 'worst case' scenario assessment, each proposal put before the Board is required to be assessed individually.

The Board's representatives gave their preliminary opinion that the BESS does not fall within the scope of S182A of the Act and that the application would need to be made to the planning authority. The substation and grid connection are likely to fall within the scope of S182A, in line with previous Board determinations, as there is an Eirgrid component to the proposed substation and will therefore become part of the transmission network. However, the Board's representatives reminded the prospective applicant that the final decision lies with the Board.

In responding to this preliminary opinion, the prospective applicant offered the view that the proposed 'substation' is not a typical substation layout and that, in practice all electrical equipment up to the point at which the cable leaves the compound will be retained in the prospective applicant's ownership. The Board's representatives acknowledged this and further acknowledged that the issue of novel electrical infrastructure proposals such as this are increasingly common and that they give rise to a degree of uncertainty, in terms of SID status, as they are not directly addressed under the legislation. It was again pointed out that the final determination will be made by the Board.

Finally, the Board's representatives advised that if any element of the proposed development is determined to be SID, any application should be supported by focussed technical reporting that relates solely to that development. Such reports should also give consideration to cumulative/in-combination impacts that may arise in tandem, between a SID element of the development and a non-SID element.

Conclusion:

The Board's representatives advised that the onus is on the prospective applicant to either request a further meeting or formal closure of the instant pre-application

consultation process. The Board's representatives advised that the record of the instant meeting will be issued in the meantime and that the prospective applicant can submit any comments it may have in writing or alternatively bring any comments for discussion at the time of any further meeting.

The Meeting concluded at 3:35pm.

A handwritten signature in black ink, appearing to read 'P. Caprani', is written over a horizontal line.

Paul Caprani

Assistant Director of Planning