

An
Bord
Pleanála

Record of 1st Meeting ABP-319771-24

Case Reference / Description	Battery Energy Storage System & 110KV Substation and Associated Grid Connection to the Adjacent 220KV Flagford Substation		
Case Type	Pre-application consultation		
1st / 2nd / 3rd / 4th Meeting	1 st		
Date	25/07/2024	Start Time	11:00 a.m.
Location	MS Teams	End Time	11:45 a.m.

Representing An Bord Pleanála
Staff Members
Stephen Kay, Assistant Director of Planning (Chair)
Niall Haverty, Senior Planning Inspector
Raymond Muwaniri, Executive Officer

Representing the Prospective Applicant
Stephen Barrett, Director of Tom Phillips & Associates
Greg Casey, Tom Phillips & Associates
Gary Magee, Head of Projects Abo Energy
Joe Jellie, Director Abo Energy

Introduction

The Board referred to the letter received from the prospective applicant on the 17th May 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 noted the fact that the subject case was one of two similar cases submitted by the prospective applicants where the prospective applicant's opinion regarding the SID status of the proposal varies. It was therefore proposed to hold a joint pre application consultation meeting for the two projects to facilitate the Boards understanding of the two cases. The other case is Ref. ABP-319241-24 at Ballyvouskill, Co. Cork.

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 proposal is for a Battery Energy Storage System (BESS) and 110kV Substation and associated grid connection to the adjacent 220kV Flagford Substation. The BESS system will comprise of 18 no. rechargeable battery units.

The overall development comprises an Independent Power Producer (IPP) or customer owned compound including BESS units, a switchgear building, a 110kV substation and other electrical infrastructure. The development is proposed to be connected to the adjoining Flagford ESB substation via tail-fed 110kV underground cables. The prospective applicant stated that the development would comprise part of Eirgrid's 110kV transmission network and a node on the national grid.

The prospective applicant noted that BESS element may not be regarded as SID, but that the 110kV substation falls within the scope of SID. It is contended that the scheme should be considered holistically, that the 110kV substation cannot complete its intended function without the BESS, and that therefore the overall scheme should be considered to constitute SID.

Discussion:

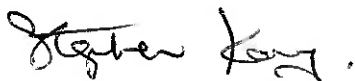
- The Boards representatives began the discussion by noting that the purpose of the proposed substation is to serve the Battery Energy Storage System (BESS). The Board representatives also noted that in past decisions the Board did not consider BESS developments to fall within the scope of section 182A of the Planning and development Act 2000, as amended.
- The Board's representatives queried whether the substation contained an IPP component and an EirGrid/ESB component. The prospective applicant confirmed that this was the case.

- The Boards representatives advised that their preliminary view on the proposed substation aspect of the proposed development is that it falls within the scope of section 182A. They stated that the BESS aspect of the development is not likely to be considered SID as it is not listed in the Seventh Schedule, is not high voltage and does not constitute transmission, in line with previous Board determinations on similar cases.
- The Board's representatives noted that the preliminary view on the likely split nature of the SID status is due to the definition of transmission contained in the current legislation. They noted that the recently published Electricity Storage Policy Framework for Ireland states that under the proposed P&D Bill, all electricity storage systems may be considered as SID.
- The Boards representatives informed the prospective applicant of various potential planning and environmental issues associated with the proposed development at Flagford. These issues included: the site being a sloping site; sightlines; watercourses in proximity to site boundaries; potential for water pollution and potential flood risk and buffer zones. It was noted that the site appears to be poorly drained and that watercourses in the vicinity connect to the Killukin River, and that AA Screening should consider this. The Board's representatives advised the prospective applicant that these issues should be clearly addressed as part of any planning application made to the Board.
- The Board's representatives noted the planning history on the site under ABP-301965-18 and advised the prospective applicant to review the Inspector's Report for that case, as the potential issues arising are likely to be similar.
- The Boards representatives queried if there are proposed onsite toilet facilities on the proposed development site. The prospective applicant clarified that there will be on site toilet facilities and that a foul storage tank would be utilised.
- The Boards representatives raised a query in relation to the cable routes of the proposed development. they questioned if the cables connecting to the substation will be crossing through local roads. The prospective applicant clarified that the plans for the cabling routing to the proposed substation have not yet been finalised as studies and surveys are still being carried out. The Board's representatives noted that the Roads Dept. of the Local Authority may have requirements for road reinstatement and condition surveys. They noted that the red line boundary on the submitted drawings did not incorporate the cable route to the existing substation.

- The Board's representatives recommended that the prospective applicant includes a robust flood risk assessment as part of their planning application.
- The Board's representatives queried the proposed landscaping works given the roadside location of the site and the extent of hedgerow removal and noted that this could result in a requirement for EIA Screening. The prospective applicant stated that landscaping would be provided and that hedgerow removal would not be significant.

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.



Stephen Kay**Assistant Director of Planning**