



An
Coimisiún
Pleanála

Inspector's Report ACP-322687-25

Development	Proposed 220kV substation and ancillary development
Location	In the townland of Ballyneague, County Cork
Planning Authority	Cork County Council
Type of Application	Pre-Application consultation under Section 182E of the Planning and Development Act 2000, (as amended)
Prospective Applicant	Orsted Onshore Ireland Midco Ltd.
Date of Site Inspection	1 st December 2025
Inspector	Joe Bonner

1.0 Introduction

- 1.1. The Commission received a request on 4th of June 2025 from the Prospective Applicant, Orsted Onshore Ireland Midco Ltd, to enter into pre-application consultations under Section 182E of the Planning and Development Act, 2000 (as amended), in relation to the proposed development of a new 220kV Air Insulated Switchgear (AIS) substation, that would loop in to the existing Knockraha-Cullenagh 220kV overhead line that runs to the south of the site, all in the townland of Ballyneague, Co Cork.
- 1.2. The case made by the prospective applicant is based on the initial submission of the 4th of June 2025 that included a cover letter and accompanying maps, and on the presentation provided to the Commission, by the prospective applicant, prior to the meeting on the 8th of December 2025. I will address the contents of these documents in section 4 below.
- 1.3. One virtual pre-application consultation meeting was held with the Prospective Applicant on 8th of December 2025. A record of the meeting is on file. The purpose of the pre-application consultation was to address the issue of whether or not the proposed development constitutes strategic infrastructure development (SID) for the purposes of the 2000 Act, as amended by the Planning and Development (Strategic Infrastructure) Act 2006.
- 1.4. Following the meeting, the Commission received a written request from the Prospective Applicant on the 19th of January 2026 requesting that the pre-application consultation process be closed.
- 1.5. This report provides an overview of the proposed development, a summary of the pre-application consultation meeting, including advice provided by the Commission's representatives and relevant legislative provisions. A list of recommended Prescribed Bodies that the proposed application should be circulated to is provided at Appendix 1.
- 1.6. My recommendation is that the proposed development **does** constitute Strategic Infrastructure Development (SID).

2.0 Site Location and Description

- 2.1. The subject site is located in a rural area, c.7km northwest of Youghal and c6.5km northeast of Killeagh, in east County Cork. The site consists of an agricultural field that lies within a larger landholding, that is currently the subject of an application to Cork County Council for a solar farm with a stated area of 342ha and an output of 250MW. The application (P.A. Reg. Ref. 25/6876) is addressed in more detail in Section 5.0 below.
- 2.2. The site of the proposed substation lies c.175m north of the nearest local road, the L-7828-0, which generally runs in a south and south easterly direction. The site would be accessed from the north east via farm tracks that would be c.2.15km in length and would include c600m of new tracks and c1550m of upgraded/existing farm access tracks. The route is shown in page 14 of the presentation made to the Commission representatives at the meeting on the 8th of December 2025. The proposed route runs north and east from the site, and would end at a proposed new access point onto the R634 road where it is proposed to construct a new entrance onto the R634 that connects Youghal in the south east to the N72, just north of Tallow, Co Waterford. The proposed access tracks would cross the L-7829-0, a north south running local road, c1550m from the proposed substation site, with access also available to the existing local road network from this point.
- 2.3. The site rises uphill from north to south and has a stated elevation range of 97 to 113m, above sea level. The topography continues to rises uphill to the south where a small area of forestry is located. The land also continues to fall downhill in a northern direction for a distance of c160m from the site, to a waterbody that eventually flows into the River Blackwater just north of Youghal town. From the waterbody, the ground rises uphill again in a northern direction towards the R634.

3.0 Proposed Development

- 3.1. The proposed development would include the following elements:
- A new 220kV substation compound (footprint of approximately 3.35ha) consisting of:
- Outdoor AIS equipment rated for the system voltage of 220kV equipped with a number of 220kV cable bays. Two number single storey buildings including an

EirGrid standard control building with ancillary services, and a customer Medium Voltage (MV) module.

- Two 180 megavolt amperes (MVA) oil-filled step-down power transformers within bunded enclosures.
- Lightning protection masts.
- A 2.6m tall palisade fence.
- Construction of 2 no. new towers.
- Two new Line Cable Interface Mast (LCIMs), under existing OHL to facilitate the removal of a short section of the existing 220kV lines.
- New site access and internal site access road.
- Car parking.
- Drainage infrastructure.
- All associated and ancillary site development works.
- The presentation to the meeting included a telecommunications tower that was not shown on the original layout plan provided with the meeting request in July 2025.

3.2. The Prospective Applicant's accompanying cover letter outlines that the substation will be located immediately adjacent to the existing 220kV Knockraha-Cullenagh overhead line, and its purpose would be to facilitate the connection of a proposed solar farm (P.A. Reg. Ref. 25/6876) to the national grid. The Prospective Applicant's presentation to the meeting on the 8th of December 2025 indicated that it would be necessary to install two new sections of 220kV overhead line, each of 48.5m, giving an overall additional length of 97m of overhead line.

4.0 Prospective Applicant's Case

4.1. The Prospective Applicant's case, consisted of a brief cover letter on the 4th of June 2025, describing the site location and the nature and extent of the proposed solar farm, and was accompanied by a site location map showing the proposed substation site in the context of the proposed solar farm. It also included a more detailed site

layout plan of the substation. The matters raised therein can be summarised as follows:

- It described the key elements of the proposed solar farm and Battery Energy Storage System (BESS) that would extend of an area of 342ha and have an estimated output of 250MW.
- As electricity transmission infrastructure may be considered Strategic Infrastructure Development Section 182A of the Planning and Development Act 2000 (as amended) (hereafter the 2000 Act), pre-application consultation must be carried out under Section 182E(1).
- Section 182(9) of the 2000 Act states that the term “transmission” shall be construed in accordance Section 2(1) of the Electricity Regulation Act 1999, and for the purposes of Section 182A of the 2000 Act, shall also be construed as meaning the transport of electricity by means of a high voltage line (equal to or greater than 110 kilovolts) or an interconnector.
- The Commission is to determine whether the proposal is or is not SID as defined by Section 182 of the 2000 Act, by Section 5 of the Planning and Development (Strategic Infrastructure) Act 2006 and by section 78 of the Planning and Development (Amendment) Act 2010.

4.2. The presentation provided to the Commission in advance of the consultation meeting and presented at the meeting included the following relevant information.

- The proposed development would consist of a 220kV AIS substation.
- It would form part of the 220kV transmission network.
- Under the provisions of section 182A of the 2000 Act, electricity transmission infrastructure development generally comprises strategic infrastructure development for 110KV, 220KV and 400KV grid connections.
- Section 182A(9) of the 2000 Act sets a threshold of 110KV for a high voltage electricity line to be considered strategic infrastructure.
- Construction of a new 220 KV AIS substation and grid connection to connect to the national grid, could constitute SID under Section 182(A) of the 2000 Act.

5.0 Relevant Planning Records in Surrounding Area

- 5.1.1. At the pre application meeting, the prospective applicant advised the Commission representatives that they were at an advanced stage of preparing an application for a solar farm on the adjoining lands and a review of Cork County Council's online planning register and the Commission's case files was carried out in January 2026. It is noted that an application for a solar farm was submitted to Cork County Council, by the prospective applicant, Orsted Onshore Ireland Midco Ltd, on the 19th of December 2025. The application has been assigned planning register reference number **25/6876**. The application falls under the provisions of the Renewable Energy Directive III (Directive (EU) 2023/2413) and the planning application may be subject to Section 34D of the Planning and Development Act 2000, as amended. This means that the planning authority must determine if the application is complete on or before the 2nd of February 2026.
- 5.1.2. The site location map submitted to the Commission shows the outline of the proposed substation lying within the boundary of the proposed solar farm that it is to service (see drawing No 7353-ABP-PP-001).
- 5.1.3. There are a number of other planning applications within the overall landholding, most notably **P.A. Reg. Ref. 02/4588** – Permission granted on the 9th of December 2003 for a windfarm to include 2 no. 1MW wind turbines, 1 no. 40m wind monitoring mast, control house and service roadways The grant was extended by way of **P.A. Reg. Ref. 08/9956** – Extension of Duration granted and expired on 17/01/2012. The development was never carried out.
- 5.1.4. There are numerous other planning applications within and adjoining the area in respect of residential, and agricultural developments which would be typical of and be expected in a such a rural location.

6.0 Relevant Precedents

- 6.1. There are a large number of pre-application directions pertaining to substation and grid connection infrastructure proposals that are similar to and of relevance to this pre-application proposal. Examples from 2025 include: -

No.	ABP Ref. No.	Development Description and Location	Decision Date	Decision
1	ACP-323441-25	110kV Gas Insulated Switchgear (GIS) electricity substation and grid connection to serve Drumdowney Solar Farm, Co. Kilkenny.	24/10/25	Is SID
2	ACP-323569-25	110kV Air Insulated Switchgear (AIS) electricity substation and a loop-in/loop-out grid connection to the existing Inniscarra Macroom 110kV overhead line at Aglish and Currahaly in Co. Cork.	22/10/25	Is SID
3	ABP-322289-25	110kV substation, 110kV underground cable and a new 110kV strategic station including 6 Line to Cable Interface Masts in Celbridge, Co. Kildare.	14/7/25	Is SID
4	ABP-322430-25	220kV Gas Insulated Switchgear Substation, High Voltage Lines and Electric Plant, Co. Westmeath.	07/07/25	Is SID
5	ABP-321855-25	Tail-fed substation with associated grid connection. Co. Carlow.	14/07/25	Is SID
6	ABP-322217-25	Proposed 220/110kV GIS substation, East Wall Road, Dublin 1.	11/06/25	Is SID
7	ABP-321580-25	110kV substation and cable connection, Co. Meath.	03/04/25	Is SID
8	ABP-321687-25	110/38kV/MV substation and associated works, Co. Limerick.	03/03/25	Is SID
9	ABP-319470-24	110kV substation and 110kV underground cable connecting to existing ESB 220kV Kellistown substation, Co. Carlow.	05/02/25	Is SID

7.0 Legislative Provisions

7.1. Planning and Development Act, 2000 (as amended)

Strategic Infrastructure

- 7.1.1. The definition of 'Strategic Infrastructure' in Section 2(1) of the Planning and Development Act 2000, as amended, includes, inter alia:

“(d) *any proposed development referred to in section 182A(1)*”

- 7.1.2. Under subsection 182A(1) of the 2000 Act, where a person (referred to as the 'undertaker') intends to carry out development comprising or for the purposes of electricity transmission, the undertaker shall prepare, or cause to be prepared, an application for approval of the development under section 182B and shall apply to the Commission for such approval accordingly.

Transmission

- 7.1.3. Subsection 182A(9) states that:

“In this section **transmission**', in relation to electricity, shall be construed in accordance with section 2(1) of the *Electricity Regulation Act 1999* but, for the purposes of this section, the foregoing expression, in relation to electricity, shall also be construed as meaning the transport of electricity by means of—

- (a) a high voltage line where the voltage would be 110 kilovolts or more, or
- (b) an interconnector, whether ownership of the interconnector will be vested in the undertaker or not.”

- 7.1.4. Section 182E(1) provides that 'a person (a “prospective applicant”) who proposes to apply for approval under section 182B or 182D shall, before making the application, enter into consultations with the Commission in relation to the proposed development'.

Electricity Regulation Act 1999 (as amended)

- 7.1.5. Section 2(1) of the Electricity Regulation Act 1999, as amended ('1999 Act'), sets out the following definitions:

- 7.1.6. **Transmission'**

“...means the transport of electricity by means of a transmission system, in the state or offshore, or both, that is to say, a system which consists, wholly or mainly, of high voltage lines and electric plant and which is used for conveying electricity from a generating station to a substation, from one generating station to another, from one substation to another or to or from any interconnector or to final customers but shall

not include any such lines which the Board may, from time to time, with the approval of the Commission, specify as being part of the distribution system but shall include any interconnector owned by the Board .”

- 7.1.7. To avoid confusion by the use of the words Board and Commission as they apply in planning legislation to ‘An Coimisiún Pleanála’ (the Commission) and its former name An Bord Pleanála (the Board), the references to the ‘Board’ and ‘Commission’ in the above definition of ‘Transmission’ are set out in Section 2(1) of the Electricity Regulation Act 1999 (as amended) and have the following meanings:

“Board” means the Electricity Supply Board;

“Commission” means the Commission for Energy Regulation

- 7.1.8. **‘Electric line’:**

“...has the meaning assigned to it by section 4(1) of the ESB (Electronic Communications Networks) Act 2014.”

The definition set out in s.4(1) of the 2014 Act is as follows:

“...any line which is used solely or amongst other things for carrying electricity for any purpose and as including –

(a) any support for any such line, that is to say, any structure, pole or other thing in, on, by or from which any such line may be supported, carried or suspended,

(b) any apparatus connected to or associated with any such line for the purpose of carrying electricity or electronic communications services, whether such apparatus is owned by the Board or by any company referred to in section 2 or by a company which has been provided access or services referred to in section 3, or

(c) any wire, cable, tube, pipe or similar thing (including its casing or coating) which is used for the purpose of carrying electricity or electronic communications services and which surrounds or supports or is surrounded or supported by, or is installed in close proximity to, or is supported, carried or suspended in association with, any such line.”

- 7.1.9. **‘Electric plant’**

“...any plant, apparatus or appliance used for, or for the purposes connected with, the generation, transmission, distribution or supply of electricity other than –

(a) An electric line

(b) a meter used for ascertaining the quantity of electricity supplied to any premises, or

(c) an electrical appliance under the control of a consumer”

7.1.10. ‘Distribution’:

“...the transport of electricity by means of a distribution system, that is to say, a system which consists of electric lines, electric plant, transformers and switchgear and which is used for conveying electricity to final customers”.

8.0 Consultation Meeting

- 8.1. One virtual pre-application consultation meeting was held with the Prospective Applicant, on 8th of December 2025. The meeting record relating to this development proposal and the presentation made by the applicant to the Commission’s representatives are attached to the file.

9.0 Assessment

- 9.1. The proposed development would comprise a new 220kV Air Insulated Switchgear (AIS) substation, with an associated grid connection comprising 97m of overhead cabling that would connect to the existing Knockraha-Cullenagh 220kV overhead line that runs to the south of the site, all in the townland of Ballyneague, Co Cork.
- 9.2. The Prospective Applicant states that the substation and grid connection are intended to serve a proposed solar farm development on 342ha of lands to the north south east and west of the substation. The solar farm is the subject of a current planning application to Cork County Council (P.A. Reg. Ref. 25/6876). The Prospective Applicant is seeking a determination from the Commission as to whether the proposed development would constitute Strategic Infrastructure Development (SID) and I note from the pre-application submission documents and the meeting, that the prospective applicant considers that it would constitute SID.

- 9.3. Section 2(1) of the Planning and Development Act 2000 (as amended) defines 'strategic infrastructure' as including, inter alia, "(d) any proposed development referred to in section 182A(1)" of the Act. Section 182A(1) of the 2000 Act states that that development comprising or for the purposes of electricity transmission shall prepare, or cause to be prepared, an application for approval of the development under section 182B and shall apply to the Commission for such approval accordingly. Section 182(9) states that "Transmission" in relation to electricity, shall be construed in accordance with section 2(1) of the Electricity Regulation Act 1999 but, for the purposes of this section, the foregoing expression, in relation to electricity, shall also be construed as meaning the transport of electricity by means of (a) a high voltage line where the voltage would be 110 kilovolts or more,
- 9.4. I refer the Commission to the definitions of 'transmission', 'electric line', 'electric plant', and 'distribution' as they are set out in section 2(1) of the Electricity Regulation Act 1999 which I have detailed in section 7 above.
- 9.5. Section 182A (9) sets a threshold of 110kV, in order for a high-voltage transmission line to be considered strategic infrastructure, for the purposes of Section 182A. The Act does not provide a threshold for substations, however; the Commission will note that the subject proposal includes 220kV infrastructure, in terms of both the substation and connecting cables and the prospective applicant has stated that the proposed development would connect to the existing adjacent 220 Knockraha-Cullenagh 220kV overhead line. I consider the proposed substation and grid connection fall within the definition of "transmission", as set out in Section 2(1) of the Electricity Regulation Act, 1999.
- 9.6. In section 6 above, I outlined a number of precedent pre-application decisions of the Commission from 2024 and 2025 in relation to electricity transmission infrastructure under S182E. In all nine cases, the Commission determined that the provision of a 110kv or 220kV substation and associated grid connection cabling acting as the connection to the electricity transmission system constituted Strategic Infrastructure Development. I consider these cases are directly related to and relevant to the current proposal.
- 9.7. On the basis of the information provided by the Prospective Applicant, I am satisfied that the proposed development would constitute Strategic Infrastructure

Development (SID) within the meaning of SID in Section 2 of the Planning and Development Act, 2000 (as amended).

9.8. In conclusion, therefore, I recommend that the Commission issue a determination that the proposed development consisting of a 220kV AIS substation and associated grid connection falls within the scope of section 182A of the Planning and Development Act, 2000 (as amended), and that a planning application for approval should be made directly to the Commission.

9.9. A list of prescribed bodies is set out in Appendix 1.

10.0 Recommendation

10.1. I recommend that the Prospective Applicant, Orsted Onshore Ireland Midco Ltd, be informed that the proposed development of a new 220kV Air Insulated Switchgear (AIS) substation, with an associated grid connection comprising 97m of overhead cabling that would connect to the existing 220 Knockraha-Cullenagh 220kV overhead line that runs to the south of the site, all in the townland of Ballyneague, Co Cork, as set out in the plans and particulars received by the Commission on 4th of June 2025, and by the details provided in the presentation to the meeting on the 8th of December 2025 falls within the scope of section 182A of the Planning and Development Act 2000, as amended, and that a planning application should therefore be made directly to the Commission.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.



Joe Bonner

Senior Planning Inspector

30th January 2026

Appendix 1 – Prescribed Bodies

The following is a list of prescribed bodies considered by the Commission to be relevant to the proposed development: -

- Minister for Housing, Local Government and Heritage.
- Minister for Climate, Energy and the Environment.
- Cork County Council
- Southern Regional Assembly
- Commission for the Regulation of Utilities
- EirGrid
- ESB
- Transport Infrastructure Ireland (TII)
- Inland Fisheries Ireland (IFI)
- The Heritage Council
- An Taisce
- Fáilte Ireland
- Health and Safety Authority (HSA)
- Health Services Executive (HSE)

Further notifications should be made where deemed appropriate.