



An
Bord
Pleanála

Inspector's Report ABP-317275-23

Development

Development of 110kV substation and underground grid connection to existing 110kV Athlone substation.

Location

Townland of Monkstown, Athlone, Co. Roscommon

Planning Authority

Roscommon County Council

Prospective Applicant

TDC Community Solar Park LTD.

Inspector

Karla Mc Bride

Date of site inspection:

23rd June 2023

1.0 Introduction

- 1.1. TDC Community Solar Park Ltd. requested Pre-Application Consultations under Section 182A of the Planning and Development Act, 2000, as amended, for the proposed development of a 110kV substation and underground grid connection. Pre-Application Consultations took place between An Bord Pleanála (the Board) and the prospective applicant on 3rd August 2023 (see appended signed Record).
- 1.2. A previous pre-application for a similar substation was submitted under ABP-310846-21 to An Bord Pleanála and was determined to constitute strategic infrastructure development. However, due to feasibility issues the proposed development required a location change which has resulted in the new pre-application for the proposed development.
- 1.3. The primary purpose of the meeting was to address the issue of whether or not the proposed development constitutes strategic infrastructure for the purposes of the 2000 Act, as amended by the Planning and Development (Strategic Infrastructure) Act, 2006, and to consider matters relating to the proper planning and sustainable development of the area or the environment which may have a bearing on the Board's decision, and procedures involved in making the application.
- 1.4. This Report provides an overview of the project, a summary of the meeting and the advice provided by the Board, the legislative provisions, and it recommends a list of Prescribed Bodies that should be forwarded copies of the application.

2.0 Site Location

- 2.1. The site is located within the townland of Monkstown c.3km to the W of Athlone in County Roscommon. It occupies an overgrown agricultural field to the W edge of the Monkstown Industrial Estate which comprises a mix of light industrial and commercial uses. Access is off the R362, and the site is bound to the S by the M6 Galway Road and Cross River, and to the E and W by agricultural fields. A permitted Solar Park and Battery Energy Storage Station (BESS) would occupy the adjacent lands, and the existing 110kV Athlone substation is located c.3km to the NE of the site. The site boundaries are defined by trees and hedges and the lands slope down towards the M6 motorway. The lands are not covered by any sensitive landscape or

heritage designations, however, the Lough Ree SAC and SPA, and the River Shannon Callows SAC and SPA are located c.3km to the E of the site.

3.0 Proposed development

The proposed development would comprise a new 110kV substation adjacent to the permitted TDC Community Solar Park and Battery Energy Storage Station (BESS) with an underground cable connection to the existing Athlone 110kV substation to the NE via a “Tail-fed” arrangement. The site of the proposed development is located c.600m NE of the previously proposed location.

The new Cuilean 110kV Single Bay AIS substation would include: -

- EirGrid / ESNB Control Room building.
- Associated Underground Cabling (2 x route options A & B).
- Installation of a 110kV/20kV Transformer (& associated equipment).
- Underground cable connection to the 110kV substation.
- Security fencing & cameras.

The prospective applicant indicated that the proposed substation would facilitate the nearby permitted Community Solar Farm (Reg. Refs. 20/36 & 21/350) and BESS (Reg. Ref.23/197) to connect to the national grid at the Athlone 110kV substation.

4.0 Prospective applicants’ case

- 4.1. TDC Community Solar Park Ltd. is proposing to construct a new 110kV substation which would be connected to the existing Athlone 110kV substation to the NE of the site via an underground cable. It is envisaged that the proposed substation would be a transmission node on the national grid, and it would connect a permitted TDC Community Solar Park and Battery Energy Storage Station (BESS) on the adjacent lands to the national grid at the Athlone 110kV substation.
- 4.2. The key elements of the Applicant’s submission in support of the case being designated as strategic infrastructure are summarised as follows:

- The proposed development meets the relevant criteria of the P&D Act 2000, as amended, and constitutes strategic infrastructure.
- The development is “transmission” as per the definition provided in the P&D Act 2000, as amended.

4.3. It was concluded that the proposed development should be deemed a SID.

5.0 Pre-Application Consultations

- 5.1. One Consultation meeting was held in the Board offices on 6th June 2023.
- 5.2. During this meeting the prospective applicant described the site and surroundings, outlined the main elements of the proposed development and provided an update on the status of the project and related energy projects. The policy context for the project was explained, the major constraints and options considered were identified (incl. 2 x grid connection route options), and the consultations undertaken to date were outlined.
- 5.3. The Board representatives identified several areas of concern (incl. potential impacts on: - hydrological connections to Lough Ree & the River Shannon; the relationship with the Lough Ree & River Shannon Callows SACs & SPAs; traffic issues; and the need for EIA & AA Screening/NIS). The Board representatives queried the current status of the nearby energy projects and the prospective applicant confirmed that there were no objections or appeals. The Board representatives queried the current status of the grid connection routes and the prospective applicant confirmed the route is the same as the previous proposal.
- 5.4. The prospective applicant, in a letter received by the Board on 20th August 2024, wishes to formally request the closure of the pre-application process, and a determination that the proposal constitutes strategic infrastructure under S.182A (9) of the Planning & Development Act 2000, as amended, as meaning the transport of electricity by means of (a) high voltage line where the voltage would be 110kV or more.
- 5.5. The applicant’s request to close the Pre-application consultations also included the following minor amendment: -

- Underground cabling would utilise Route Option B with a slight variation to the route in the vicinity of the private loop road to the W of the industrial building at an earlier point than previously indicated (Drg. No. 220907-a-02 & 220907-a-02E)

5.6. The Board's advice to the prospective applicant during the pre-application consultation meetings is summarised below:

- (a) Consult with the NPWS and other Prescribed Bodies in relation to potential impacts on the River Shannon and Lough Ree European sites, and any further afield European sites that may have a mobile connection to the site.
- (b) Carry out an Otter survey, assess potential impacts on archaeology, site access and local road network, and estimate the extent of hedgerow removal and replacement.
- (c) An Environmental Report should be prepared which has particular regard to the impact of the proposed development on ecology and biodiversity, amenity, heritage, drainage, water quality, flood risk and traffic management.
- (d) A comprehensive and detailed AA Screening/NIS should be prepared having regard to the presence of European sites in the surrounding area.
- (e) Due consideration should be given to in-combination effects on the environment with other existing and proposed developments in the wider area, including the permitted Solar Park and Battery Energy Storage Station.
- (f) Public consultation should be as extensive as possible and consultations should take place with Roscommon County Council, Prescribed Bodies and the local community.

6.0 Legislative provisions

6.1. Under **section 182A (1)** of the 2000 Act (inserted by section 4 of the 2006 Act) where a person, (thereafter referred to as the 'undertaker') intends to carry out development comprising or for the purposes of electricity transmission, (hereafter referred to in this section and section 182B as 'proposed development'), the undertaker shall prepare, or cause to be prepared, an application for approval of

development under section 182B and shall apply to the Board for such approval accordingly.

- 6.2. **Subsection 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.

- 6.3. In **section 2(1) of the Electricity Regulation Act, 1999**, "transmission" is defined as the transport of electricity by means of a transmission system, 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.

"Distribution" is defined as

"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 switch gear and which is used for conveying electricity to final customers."

"Electric plant" is defined as:

"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

7.0 Assessment

- 7.1. The proposed development comprises a new 110kV substation and underground cable connection to the existing 110kV Athlone substation to the NE. It is envisaged that electricity generated and stored by the adjacent solar farm and battery storage facility would be “tail-fed” into the national grid via the proposed substation.
- 7.2. I am satisfied that the proposed 110kV substation constitutes electric plant as defined in section 6.0 above in that it is plant for the purposes connected with the generation of electricity.
- 7.3. Section 182A (9) of the Act sets a threshold of 110kV in order for a high voltage electricity transmission line to be considered strategic infrastructure. No threshold is set in respect of a substation.
- 7.4. The proposed substation involves a “tail-fed” connection to an existing Athlone 110kV substation, and it would comprise a new transmission node along the existing circuit. The new substation and associated underground cable will form part of the existing transmission grid when in operation. I am satisfied that the proposed substation, in forming a node on the transmission network, constitutes Strategic Infrastructure.
- 7.5. In terms of matters which might influence the decision of the Board I note that there is potential for indirect effects, interactions and cumulative impacts which would be relevant to consideration in an Environmental Report and under AA Screening and/or NIS reports. A Screening report for sub-threshold EIA should also be considered.
- 7.6. In conclusion, I consider that the proposed substation development and underground grid connection as described in the submissions and drawings constitutes strategic infrastructure coming within the scope of section 182A of the Planning and Development Act 2000, as amended, necessitating an application direct to the Board.

8.0 Recommendation

- 8.1. I recommend that TDC Community Solar Park Ltd. be informed that the proposed development consisting of a 110kV substation, underground cables and related ancillary infrastructure within the townland of Monkstown, Athlone, County Roscommon as set out in the plans, particulars and correspondence received by An Bord Pleanála on the 6th June 2023 and 20th August 2024, falls within the scope of section 182A of the Planning and Development Act 2000, as amended, and that a planning application should be made directly to the Board.

9.0 Prescribed Bodies

The following is a schedule of prescribed bodies considered relevant for the purposes of Section 37E (3) (c) of the Principal Act.

- i. Minister for Housing, Local Government and Heritage
- ii. Minister for Environment, Climate and Communications
- iii. Commission for Regulation of Utilities, Water and Energy
- iv. Inland Fisheries Ireland
- v. Transport Infrastructure Ireland
- vi. The Heritage Council
- vii. An Taisce
- viii. An Chomhairle Ealaíon
- ix. Fáilte Ireland
- x. Health & Safety Authority

Further notifications should also be made where deemed appropriate.

Professional Declaration

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.

Karla Mc Bride

Senior Planning Inspector

10th September 2024