

An
Bord
Pleanála

Inspector's Report

ABP-321034-24

Development	110 kV Substation, grid connection and associated works
Location	Glenora and adjacent townlands, County Mayo.
Planning Authority	Mayo County Council
Prospective Applicant	Glenora Wind Farm DAC
Type of Application	Pre-Application Consultation under Section 182E of the Planning and Development Act 2000, as amended
Date of Site Inspection	4 th November 2024
Inspector	Tomás Bradley

1.0 Introduction

An Bord Pleanála ('the Board') received a request on 8th October 2024 from the prospective applicant, Glenora Wind Farm DAC¹, to enter into pre-application consultations under Section 182E of the Planning and Development Act 2000, as amended ('the Act'), in relation to the proposed development of a 110 kV Substation, grid connection cabling, and associated works in the townlands of Glenora and adjacent townlands, Co. Mayo.

The proposed development is entirely in the local authority of Mayo County Council (MCC).

The primary purpose of the pre-application consultation is to determine whether or not the proposed development constitutes Strategic Infrastructure Development (SID). The applicant is of the view that the proposed development constitutes SID.

One pre-application consultation meeting was held with the prospective applicant on 15th of November 2024. A record of the meeting is on file. A letter requesting closure of the consultation process was received on the 17th of April 2024.

The Board should note that in the same letter of 17th April 2024, the applicant requested that the Battery Energy Storage System (BESS) element of the proposed development, originally included in the application request, be excluded from consideration of the Board. This is considered acceptable.

This report concludes by recommending that the 110 kV substation and associated 110kV cable connection to Tawnaghmore 110 kV Substation constitute SID.

2.0 Site Description

The proposed development is located between a proposed 110 kV substation (related to the submitted, but undecided wind farm application (ABP-318701-23)) in the townland of Glenora, Co. Mayo and the existing Tawnaghmore 110 kV Substation in the townland of Tawnaghmore Upper, Co. Mayo. Tawnaghmore 110 kV Substation is part of the national grid.

¹ A joint venture company between SSE Renewables and FuturEnergy Ireland.

Both stations will be connected via approximately 26 km of 110 kV underground cable (UGC) which would run through the townlands of Glenora, Glencullin, Aghoo, Killeena, Ballycastle, Ballinglen, Annagh More, Annagh Beg, Creevagh Beg, Creevagh More, Farmhill, Kincon, Ardnagor, Kinnavally, Ballinagavna, Rathnadoffy, Lecarrowanteean, Ballygowan, Killogunra, Knockaunderry, Cloonmaan, Cloonalough, Coolcran, Cloonfadda, Cloonawillin, Mullafarry, Lisglennon and Tawnaghmore Upper.

It uses the following public roads: L5189, R314, R315, L1110 as well as forestry road and pasture land. It passes through the villages of Ballycastle and Kilcon as well crossing the Glencullin Stream, Ballinglen River, Cloonaghmore River and several other stream. Part of the UGC route is on the Western Way which is a long distance way marked trail.

There are several natural heritage designations in proximity to the site, including the Glenamoy Bog which is both Special Area of Conservation (SAC) and a proposed Natural Heritage Area (pNHA). The Bellacorick Bog Complex SAC and pNHA, Inagh Bog NHA and Ummerantarry Bog NHA are also in proximity to the site. There are also designations along the coast at Killalla Bay, Downpatrick Head and Kilcummin Head.

There is a range of built heritage features along the site, including architecture features, including the Tonrehown Bridge (National Inventory of Architectural Heritage: 31302109) which crosses the Cloonaghmore River and other archaeological features along the road side.

3.0 Development Description

The proposed development includes:

- a 110 kV substation of approximately 2.15 ha on the site of the proposed Glenora Wind Farm (ABP Ref: 318701) which will include control buildings and other electrical apparatus.
- a 110 kV UGC (approximately 26 km) between from the 110 KV substation to the existing Tawnaghmore 110 kV substation.
- associated works

4.0 Planning History

A review of the MCC Planning Portal and the Board's case files was carried out in April 2025 to collate any relevant planning history for the site.

The most relevant planning history is that for Glenora Wind Farm (ABP-318701-23) which is a live planning application before the Board. This application is directly related to this pre-application request.

It is noted that there are several wind farms proposed or permitted/approved in the area. This includes Keerglen Wind Farm (MCC Ref: 24/60537) to the south which has recently been submitted to MCC – it is currently at Further Information stage. There are numerous operation wind farms to the south also including Sheskin Wind Farm and Oweninny Wind Farm.

At Tawnaghmore, there is an extensive planning history associated with Killala Business Park, in which the existing substation is located, the Tawnaghmore Power Station, Killala Community Wind Farm and a proposed anaerobic digester biogas facility.

There are numerous planning applications adjoining the proposed UGC route in respect of residential, commercial and agricultural developments which is to be expected in a such a rural location.

5.0 Precedents

A review of the Board's case files was carried out the on the April 2025 to collate any relevant planning precedent cases for this class of development. There is significant precedent specific to the circumstance of this application where the proposed development included a 110 kV UGC connecting a wind farm to the national grid.

Ref.	County	Infrastructure	Year	Decision
ABP-319155-24	Co. Cork	Proposed development of a 110kV substation and grid connection to the adjacent 220kV Knockraha Substation.	2024	Is SID
ABP-318011-23	Co. Wexford	BESS, 110kV substation and 110kV Underground Grid Connection to existing Great Island EirGrid Substation and all associated site works	2023	Substation and cables are SID. The BESS is not SID.
ABP-315972-23	Co. Louth	Proposed 2 number 110kV substations and grid connection in lieu of 2 number 37kV substations and grid connection	2023	Is SID

		granted by Louth County Council to facilitate permitted solar and BESS development and proposed extensions		
ABP-315433-22	Co. Kildare	Proposed development of a 220kV Air Insulated (AIS) tail fed substation with the associated grid connection comprising 220kV underground cabling to connect into the existing 400/220kV Dunnstown substation	2023	Is SID
ABP-313680-22	Co. Offaly	Development of a 110kV substation and grid connection serving a proposed solar PV farm.	2023	Is SID
ABP-313676-22		Development of a substation and associated grid connection	2022	Is SID
ABP-313613-22	Co. Cork	Construction of a 110kV substation and grid connection along with associated infrastructure in respect of a permitted solar development.	2023	Is SID
ABP-311403-21	Co. Offaly	Proposed development of 110kV infrastructure	2022	Is SID
ABP-301705-18	Co. Galway	100MW BESS.	2018	Not SID
ABP-301675-18	Co. Cork	BESS, 110kV substation and associated development.	2018	Not SID
ABP-301236-18	Dublin 2	Provision of a BESS	2018	Not SID
ABP-301206-18	Co. Waterford	Solar farm and BESS with an associated 110kV substation	2019	Substation and cables are SID. Solar farm and BESS are not SID.

6.0 Submission of the Prospective Applicant

The prospective applicant's case, as outlined in the cover letter submitted. The applicant is of the view that the proposed development constitutes SID.

7.0 Legislative Provisions

Strategic Infrastructure

Section 2 (1) of the Act defines SID as including, *inter alia*:

"any proposed development referred to in Section 182A(1)"

Under subsection 182A(1) of the Act, where a person (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 Board for such approval accordingly.

Subsection 182A(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 high voltage line where the voltage would be 110 kilovolts or more, or

an interconnector, whether ownership of the interconnector will be vested in the undertaker or not.”

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

The following definitions, as set out in Section 2(1) of the Electricity Regulation Act, 1999, as amended, are noted:

- **‘Transmission’**: *“...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.”*
- **‘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 Section 4 (1) of the ESB (Electronic Communications Networks) Act 2014 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

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."

- **'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"

- **'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".

Environmental Impact Assessment

Schedule 5 of the Planning and Development Regulations 2001, as amended transposes Annex I and II of the EIA Directive and sets out prescribed classes of development, for which an environmental impact assessment is required.

The applicant expects to submit an Environmental Impact Assessment Report.

Appropriate Assessment

Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora ('the Habitats Directive') is European Community legislation aimed at nature conservation.

The Habitats Directive requires that where a plan or project is likely to have a significant effect on a European site(s), (and where the plan or project is not directly connected with or necessary to the nature conservation management of the European site), the plan or project will be subject to Appropriate Assessment (AA) to identify any implications for the European site(s) in view of the site's Conservation Objectives. The Habitats Directive is transposed into Irish law by Part XAB of the PDA, and the PDR.

The applicant expects to submit a Natura Impact Assessment.

8.0 Meeting with the Prospective Applicant

One pre-application consultation meeting was held with the prospective applicant on the 15th of November 2024. The meeting record relating to this development proposal and the presentation made by the applicant to the Board's representatives are attached to the file.

9.0 Assessment

Consideration of SID

Based on this statutory definition and the information contained in the prospective applicant's request, I am satisfied that the existing Tawnaghmore 110 kV substation can be regarded as part of the electricity transmission system for the purposes of the 2000 Act.

It is clear that the proposed grid connection from the proposed Glenora 110 kV Substation via a 110 kV underground cable would compromise SID under the plain meaning of Section 182A (9) of the Act. It satisfies the definition of 'transmission', being a system which consists, wholly or mainly, of high voltage lines and electrical plant used for the conveying of electricity from one substation to another. This interpretation is supported by a significant number of precedents also, inter alia: ABP-313680-22, ABP-313352-22, ABP-313001-22, ABP-312860-22, and ABP-312700-22.

Therefore, I consider that the 110kV substation and 110kV cable elements of the proposed development would fall within the scope of section 182A of the Act, and that a planning application should be made directly to the Board.

The Board is reminded that the applicant has chosen to omit the BESS facility by way of letter on the 17th of April 2025 and is not given any consideration in this assessment.

Prescribed Bodies

In view of the nature and location of the proposed development, as described in this report, it is recommended that the prospective applicant should consult with the prescribed bodies listed in the attached Appendix in respect of any future application for approval.

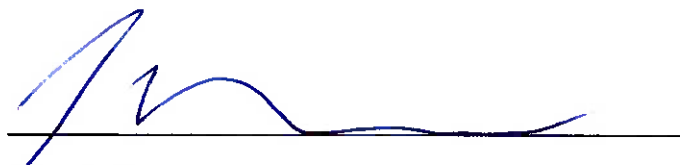
10.0 Recommendation

Based on the foregoing assessment, it can be concluded that the proposed development (110 kV substation and underground cable) falls within the scope of Section 182A of the Planning and Development Act 2000, as amended

It is recommended that the Board serve a notice on the prospective applicant, Glenora Wind Farm DAC, that it is of the opinion that the 110 kV Substation and underground cable does fall within the scope of Section 182A of the Act and that a planning application should be made directly to the Board

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.



Tomás Bradley,

Senior Planning Inspector

30th April 2025

Appendix 1: Prescribed Bodies

The following is a list of prescribed bodies considered relevant by the Board:

- Minister for Housing, Local Government and Heritage (Development Applications Unit).
- Minister for the Environment, Climate and Communications.
- Minister for Agriculture, Food and the Marine
- Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media
- Mayo County Council
- North and West Regional Assembly
- Transport Infrastructure Ireland
- An Chomhairle Ealaíon
- Fáilte Ireland
- Inland Fisheries Ireland
- National Parks and Wildlife Service
- Irish Aviation Authority
- Office of Public Works
- The Heritage Council
- An Taisce – the National Trust for Ireland
- Health Service Executive
- The Commission for Energy Regulation
- Uisce Éireann

This list is consistent with list of prescribed bodies for the related application (ABP-310528-18)

Further notifications should also be made, where deemed appropriate.