

An
Coimisiún
Pleanála

Inspector's Report

ABP-322430-25

Development	220kV Gas Insulated Switchgear Substation, High Voltage Lines and Electric Plant and associated Site Development Works.
Location	located in the townlands of Kiltolan & Collinstown, Oldtown & Farthingstown, Co. Westmeath
Planning Authority	Westmeath County Council
Prospective Applicant	Red Admiral DC
Type of Application	Pre-Application Consultation under Section 182E of the Planning and Development Act 2000, as amended
Date of Site Inspection	2 nd May 2025
Inspector	Tomás Bradley

1.0 Introduction

An Bord Pleanála ('the Commission') received a request on 1st of May 2025 from the prospective applicant, Red Admiral DC Ltd, 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 220kV Gas Insulated Switchgear substation, high voltage lines and electric plant and associated site development works in the townlands of Kiltotan & Collinstown, Oldtown & Farthingstown, Co. Westmeath. The proposed development is entirely within the local authority of Westmeath County Council (WCC).

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.

The Commission should note a related pre-application consultation under Section 37 of the Act for a wider development which included an associated proposed Data Centre, Solar Farm and Decentralised Energy Resource (DER) (ABP-321564-24). It was determined by the Commission that these elements of the project were not SID on the 19th May 2025.

Within that consultation, the applicant was advised that electrical components may constitute SID under Section 182A of the Act and a separate request would need to be made under Section 182E of the Act to determine this. This is that related application now before the Commission.

2.0 Site Location and Description

The site, which extends to 225 hectares, is located in the townlands of in the townlands of Kiltotan & Collinstown, Oldtown & Farthingstown, Co. Westmeath. It is immediately south-west of the settlement of Rochfortbridge, Co. Westmeath and occupies land either side of the R446 Regional Road and M6 Motorway.

The site is accessed from the R446 Regional Road which is the former main N6 national road between Dublin and Galway and a minor local roads (L51251) via an overbridge at the motorway to access lands to the south. There are existing internal tracks within the site.

The site is largely in agricultural lands with a field pattern defined by trees and hedgerows. It is largely flat and low rolling terrain. There are agricultural yards in different locations throughout the site. The southern side of the site is bounded by forestry and a peatland complex. The Monagh River (Castlejordan 07) bounds the northern side of the site. There are residential dwellings located in a linear form along the roads and lanes that are in proximity to the site. An existing transmission station, Castlelost 220 kV Station located centrally within the site. The corresponding 220 kV overhead line approaches from the north-west.

There are no natural heritage designations in proximity to the site. There are numerous Sites and Monuments Records (SMR) throughout the site which are largely identified as ringforts. There are no known flood issues associated with the site. There are no protected structures, protected views & prospects.

3.0 Proposed Development

The proposed development includes HV electricity infrastructure associated with a proposed Data Centre, Solar Farm and Decentralised Energy Resource (DER) and consists of an Independent Power Producer (IPP) 220kV Gas Insulated Switchgear (GIS) Building and associated High Voltage (HV) Lines and electric plant.

The proposed IPP 220kV GIS Building will facilitate connection of a proposed DER to a collocated Data Centre Development via underground HV cables, step-down transformers and a 33kV IPP building.

The proposed IPP 220kV GIS Building will also electrically connect to the existing and adjoining Castlelost 220kV GIS substation, which is a "node" on the national electricity grid. This connectivity will allow import of electricity from the grid during unconstrained periods, ensuring security of supply and enabling flexible operational management.

The Board should note that the prospective applicant has stated that the GIS substation would likely remain an IPP asset, meaning it will be maintained and operated by the prospective applicant and not form part of the national grid which is under the operation of EirGrid and ESB.

4.0 Planning History

A review of the WCC Planning Portal and the Commission's case files was carried out in June 2025 to collate any relevant planning history for the site. Notable applications within and adjacent include:

- the alteration of the 220 kV line to facilitate the motorway in 2004 (04/4133);
- the development of and alteration to a 275MWe reserve gas-fired generator (24/60053, 23/60442, 21/515,
- a BESS facility in 2021 (21/532)

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

5.0 Precedent

A review of the Commission's case files was carried out the on the June 2025 to collate any relevant planning precedent cases for this class of development. There are numerous examples of 110kV and 220 kV electricity infrastructure being considered SID.

6.0 Submission of the Prospective Applicant

An initial submission dated May 2025 prepared by Halston, on behalf of the prospective applicant, accompanied the application in respect of the SID case file. The submission considered the development location, development description, need for the proposed development, legislative provisions and the applicant's consideration of SID.

A meeting was held with the prospective applicant on the 15th of May 2025. The details of this meeting are set out in the record contained on the file. The Commission's representatives discussed a number of considerations, related to proper planning and sustainable development or the environment, that may, have a bearing on the application which are noted in said record.

The prospective applicant sought closure of the consultation on the 23rd of June 2025.

7.0 Legislative Context

7.1. 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 Commission 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 Commission 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".

8.0 Assessment

8.1 Consideration of SID

Based on this statutory definition and the information contained in the prospective applicant's request, I am satisfied that the substations, IPP 220kV GIS building, transformers, and electrical components would constitute SID. It satisfies the definition of 'transmission', being a system largely at a nominal voltage of 220 kV and which consists, wholly or mainly, of high voltage lines and electrical plant used for the conveying of electricity from one substation to another

The Commission should refer to the single line diagram (SLD) in Figure 1 of the applicant's submission of May 2025 and the infrastructure denoted in orange. The infrastructure denoted in orange constitutes SID, as this is electricity infrastructure greater than 110kV. The Power Producer (PP) compounds denoted in black are directly related to the transmission infrastructure and would simply constitute associated electricity plant and therefore would also constitute SID. It is my view that the other connections between the PP compounds and the various generation, demand centres would not be SID and would be applied for under other sections of the Act. This distinction was clarified with the prospective applicant during the meeting.

The Commission will note that that electricity infrastructure for this project is much more decentralised than a convention substation and grid connection owing to the multifaceted nature of the project which includes a data centre, solar farm and Decentralised Energy Resource and this has resulted in a more complex arrangement for the transmission infrastructure. However, the principle of what is transmission remains in this decentralised approach.

The Commission will note, as advised by the prospective applicant, that the 220kV GIS building may remain a private asset in future under the operation of the prospective applicant and may not transfer to the national grid. This matter was considered in reaching a conclusion on SID and the Commission should note that the legislation is silent on the matter of ownership of 'transmission' infrastructure and the nominal voltage is the material criteria for determining SID. Therefore, ownership and operational models are not a considered further.

In conclusion, I consider that the 220kV GIS substation, transformers, associated Power Producer (PP) and associated 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 Commission.

8.2. 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.

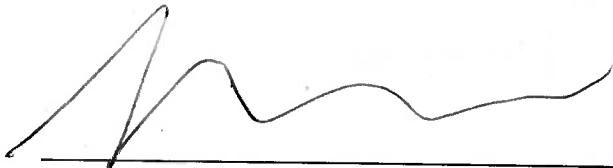
9.0 Recommendation

Based on the foregoing assessment, it can be concluded that the proposed development falls within the scope of Section 182A of the Planning and Development Act 2000, as amended

It is recommended that the Commission serve a notice on the prospective applicant, Red Admiral DC Limited, that it is of the opinion that the proposed development does fall 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 Commission

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.

A handwritten signature in black ink, consisting of a series of loops and curves, positioned above a horizontal line.

Tomás Bradley,
Senior Planning Inspector

25th June 2025

10.0 Appendix 1: Prescribed Bodies

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

- 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
- Westmeath County Council
- Eastern and Midlands Regional Assembly
- Transport Infrastructure Ireland
- An Chomhairle Ealaíon
- Fáilte Ireland
- Inland Fisheries Ireland
- National Parks and Wildlife Service
- Office of Public Works
- The Heritage Council
- An Taisce – the National Trust for Ireland
- Health Service Executive
- The Commission for Energy Regulation
- Uisce Éireann

Further notifications should also be made, where deemed appropriate.