



An
Coimisiún
Pleanála

Inspector's Report ABP-322876-25

Development	Proposed development of a 110kV export grid connection cable route from the permitted onsite substation at Lackendarragh to the existing Barrymore 110kV substation and amendments to the proposed Lackendarragh substation.
Location	Within the townlands of Ballynahina, Coolmucky, Farran South, Farran North, Corrin, Glanakip, Lackendarragh North, Knockaunacorrin, Moanlahan, Mullenataura, Knockananig, Coolnakilla, Kill-Saint-Anne North and Rathcormack-Mountain, Co. 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	Coom Green Energy Park Limited
Inspector	Jimmy Green

1.0 Introduction

- 1.1 The Commission received a request on 24th June 2025 from the prospective applicant, Coom Green Energy Park Limited, Floor 5, City Quarter, Lapps Quay, Co. Cork to enter into pre-application consultations under Section 182E of the Planning and Development Act, 2000, (as amended) ('the Planning Act'). The initial submissions from the applicant had both 110kV and 33kV infrastructure referenced however, the extent of the subject works were clarified by the prospective applicant in the meetings held and in the close out request, in which the prospective applicant stated that the subject pre-application consultations related solely to the 110kV infrastructure associated with amendments to a previously consented 110kV substation and its underground cable connection to the national electricity grid. Further clarity is provided, in relation to the works subject to this pre-application consultation in the site location and description section of this report below.
- 1.2 Two pre-application consultation meetings were held with the prospective applicant on the 28th of August and 14th of November 2025. The records of these meetings are on file. A letter requesting closure of the consultation process was received on the 9th of January 2026. The closure letter also included a location map clearly identifying the extent of the subject works i.e. relating solely to amendments to a previously consented 110kV substation at Lackendarragh and 110kV underground electrical cabling connection to the existing Barrymore substation.
- 1.3 The primary purpose of the pre-application consultation is to address the issue of whether or not the proposed development constitutes Section 182A development (strategic infrastructure) for the purposes of the Planning Act.

2. Site Location and Description

- 2.1 As referenced above, from the applicant's initial submission there was ambiguity in relation to what elements of the proposed development were subject to the current pre-application consultations. The meeting presentations and map submitted with the close-out letter have fully addressed this ambiguity, however, as the subject works have now been fully and clearly identified.

- 2.2 The site of the proposed development extends from the existing 110kV substation at Barrymore (which is located c. 2.5km northeast of Rathcormack, Co. Cork), along a 13.9km linear route generally following the public road network as follows:
- North along the L1517 (passing rural one-off housing, a wood mill and stream crossing) and R639 (to an industrial/commercial complex at Corrin),
 - Turning west along the L5770 (crossing the M8 and passing the entrance to the Corrin Wood Forest Recreation area),
 - Continuing west along the L5771 (passing Fermoy Golf Club) and local road network running through broadly agricultural lands with a dispersed rural settlement pattern and forestry lands.
 - Turning west and north onto a forestry track at Lackendarragh North, and running from there in a northwest direction through forestry tracks (crossing one public road) until reaching the site of the proposed Lackendarragh substation (c. 9.5km north west of Rathcormack) which was previously consented under a Strategic Infrastructure Development application for a wind farm (308885-20 refers).
- 2.3 The site of the proposed/previously consented Lackendarragh substation is set within a large area of forestry that is accessible by a narrow track. No works have been carried out at the location of this substation with forestry being the predominant landuse.
- 2.4 Notwithstanding the clarifications provided in relation to the extent of the subject works in the meetings and updated documentation the applicant has not taken the opportunity to amend their initial list of 26 no. townlands used to describe the location of the proposed works. The works subject to the current S182E pre-application are potentially only located in 14 no. townlands in Co. Cork. This lack of clarity is compounded by the Commission's own correspondence, to date, which has used an abridged list of seven townlands to describe the location of the works, notwithstanding the fact that none of the subject works are located within any of those townlands.
- 2.5 For clarity and on review of the mapping provided by the applicant the subject works are located in the townlands of Ballynahina, Coolmucky, Farran South, Farran North, Corrin, Glanakip, Lackendarragh North, Knockaunacorrin, Moanlahan, Mullenataura,

Knockananig, Coolnakilla, Kill-Saint-Anne North and Rathcormack-Mountain, Co. Cork.

3. Proposed Development

3.1 The works subject to this pre-application consultation constitutes the following:

(a) The provision of 110kV underground electrical cabling from the existing Barrymore 110kV substation to the location of the previously consented Lackendarragh 110kV substation (ABP-308885-20 refers), and

(b) Amendments to the previously consented Lackendarragh substation.

3.2 The amendments being sought to the previously consented Lackendarragh substation are within the previously approved SID site boundaries (which had been designed to accommodate any potential future expansion of the substation). The subject amendments primarily relate to the provision of different electrical equipment across an expanded compound area (within the original established boundaries) to satisfy Eirgrid's operational requirements. The commission will note that the previously consented substation included a Battery Energy Storage System immediately adjacent.

4. Prospective Applicant's Case

4.1 The prospective applicant's case, as outlined in the cover letter lists the relevant sections of Section 182A of the Planning and Development Act, 2000 (as amended), but goes on to discuss the provisions of Section 37A(2) of the Planning Act, which are not relevant in the current case.

4.2 From discussions at the two meetings the applicant has clarified their position that they consider the 110kV works associated with the provision of the underground electrical cable between the existing substation at Barrymore and the consented Lackendarragh substation, as well as the amendments to the 110kV Lackendarragh substation to fall under the scope of section 182A of the Planning Act. Their reasoning in this regard is that the works fall within the definition of 'transmission' and that the works all relate to 110kV infrastructure and associated works. They are

therefore of the opinion that any future planning application for these works should be made directly to An Coimisiún Pleanála.

5. Relevant Planning History

5.1 The most relevant planning history in the context of the current proposal is:

- **308885-20**: Permission granted by An Bord Pleanála to the prospective applicant in November 2023 for the construction of 22 no. wind turbines and all related ancillary development. Permission included the provision of a 110kV substation at Lackendarragh (which is being proposed for amendments under the current pre-application consultations). The consented wind farm is in two clusters with 15 no. turbines in the western cluster (in the Bottlehill and Mullenaboree area) and 7 no. turbines in the eastern cluster (in the Knockdoorty and Lackendarragh North area). Construction has not yet commenced in relation to this consent.

6. Relevant Precedents

6.1 The prospective applicant has not provided any precedent cases that support their opinion; however, I have listed below some cases which could be considered to have broadly similar characteristics and provide some precedent in relation to the subject works.

Ref. No.	Location	Development Description	Decision Date	Decision
323167-25	Co. Kerry	Proposed 110kV substation and associated Grid Connection	8/01/2026	Is SID
322861-25	Co. Cork	Proposed Battery Energy Storage System (BESS), 110kV substation building & underground cable	4/11/2025	Is SID
323569-25	Co. Cork	Proposed 110kV substation and grid connection	22/10/2025	Is SID
323441-25	Co. Kilkenny	Proposed 110kV substation and grid connection	24/10/2025	Is SID
322289-25	Co. Kildare	Proposed 110kV substation, 110kV underground cable & line to cable interface masts	14/07/2025	Is SID
321580-25	Co. Meath	110kV substation and cable connection	13/02/2025	Is SID
319470-24	Carlow	Proposed 110kV substation and 110kV underground cable connecting to existing ESB 220kV Kellistown substation	05/02/2025	Is SID

319042-24	Roscommon	Proposed 110kV substation and underground 110kV transmission line from Brideswell to Moyvannan	25/10/2024	Is SID
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7. Legislative provisions

7.1 Planning and Development Act 2000, as amended.

Section 2(1) of the Planning and Development Act 2000, as amended ('2000 Act'), defines 'strategic infrastructure' as including, *inter alia*:

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

Under subsection 182A(1) of the 2000 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) 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."*

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.

7.2 Electricity Regulation Act 1999, as Amended

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

- **'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 Commission 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 Commission.”

▪ **‘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 Commission 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. Consultation Meetings

8.1 The first pre-application consultation meeting was held with the prospective applicant on the 28th of August 2025, and a second meeting was held on the 14th of November 2025. The records of both meetings relating to this development proposal and the presentations made by the prospective applicant to the Commission’s representatives are all attached to the file.

9. Assessment

9.1 The definition of ‘strategic infrastructure’ includes development comprising or for the purposes of electricity transmission, with ‘transmission’ defined as either:

- The transport of electricity by means of a high voltage line of 110 kV or more, or an interconnector.
- The transport of electricity by means of a transmission system (a system of high voltage lines and electric plant 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, including interconnectors but excluding distribution system lines).

9.2 Based on the statutory definition and the information contained in the prospective applicant’s request, I am satisfied that the existing Barrymore substation can be regarded as part of the electricity transmission system for the purposes of the Planning Act.

- 9.3 The proposed development, as clarified by the applicant in the pre-application consultation meetings and presentations, relates solely to the provision of 110kV transmission works constituting (a) alterations to a previously permitted 110KV substation at Lackendarragh and (b) the provision of an underground 110kV electrical cable from that substation to the existing 110kV substation at Barrymore.
- 9.4 In relation to the proposed underground 110kV electrical cabling connecting the consented substation at Lackendarragh to the existing Barrymore substation I am satisfied that these works fall within the scope of Section 182A, due to their nature and the relevant definitions of transmission within the Planning Act. Furthermore, there is significant precedent for such electrical connections being considered as Section 182A development as cited previously above.
- 9.5 Similarly in relation to the amendments being proposed to the previously consented Lackendarragh substation, which will function as a connection point between the 110kV cabling and the energy which will be produced from the SID wind farm development, I am satisfied that these works relate to transmission as defined in Section 182A. There is also extensive established precedent for new substations (of 110kV or higher voltages) being deemed to comprise Section 182A development. I note that a substation has been consented previously at this location, albeit that no construction works have commenced. Having regard to the nature of the amendments to this substation, these all relate to 110kV infrastructure and I am satisfied that the amendments proposed are intrinsically required as part of the overall project to provide the 110kV connection to the national grid. Accordingly, I am satisfied that both the underground 110kV cabling connection to Barrymore substation and amendments to the previously consented Lackendarragh substation satisfy the definition of 'transmission', being a system which consists, wholly or mainly, of high voltage lines and electrical plant used for the conveying or electricity from one substation to another.
- 9.6 For the purposes of clarity in relation to the proposed amendments to the consented 110kV Lackendarragh substation I note that some minor amendments will also be required to the previously consented BESS associated with the substation at this location. I acknowledge some precedent cases have determined that BESS facilities did not comprise 'transmission' within the definitions set out in the Planning Act, and therefore such works were not previously considered within the scope of Section

182A. The Commission has, however, determined in other more recent cases (e.g. 322861-25, from November 2025), that in order to address ongoing innovations on the national grid in respect of both increasing the penetration of renewable energy development and stabilising the existing grid infrastructure a wider interpretation of Section 182A would be appropriate where a BESS is integrated with, and forms part of, a new 110kV transmission substation which itself meets the relevant threshold in Section 182A. In this regard, and in the interests of clarity in relation to the subject works I note that the amendments to the consented 110kV substation also incorporate minor amendments to the BESS and I consider that all such works due to their intrinsic association to transmission works in this instance fall within the scope of Section 182A of the Planning Act.

9.7 In conclusion, therefore, I recommend that the Commission issue a determination that the proposed development of a 110kV export grid connection cable route from the permitted Lackendarragh 110kV substation to the existing Barrymore 110kV substation and amendments to the permitted Lackendarragh 110kV substation does fall within the scope of Section 182A of the 2000 Act, as amended, and that a planning application should be made directly to the Commission, in the first instance. Due to the ambiguity in the initial submission from the prospective applicant as to the extent and nature of the subject works, and inaccurate listing of relevant townlands by both the Commission and prospective applicant, it is important to ensure that the list of townland names is altered in the Commission's correspondence and development description to that as referenced in this report. Furthermore, to avoid confusion or any ambiguity the Commission is advised not to reference the prospective applicant's initial submission to identify the relevant Section 182A works due to some ambiguity within that initial submission. Accordingly, I recommend that the presentation documentation submitted at both meetings and map included in the close-out letter should only be the only plans and particulars referenced.

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

10. Recommendation

I recommend that the prospective applicant, Croom Green Energy Park Limited be informed that:

- the proposed development of an underground 110kV grid connection cable from the permitted 110kV substation at Lackendarragh to the existing 110kV Barrymore substation as well as amendments/modifications to the 110kV Lackendarragh substation and all associated works on lands at Ballynahina, Coolmucky, Farran South, Farran North, Corrin, Glanakip, Lackendarragh North, Knockaunacorrin, Moanlahan, Mullenataura, Knockananig, Coolnakilla, Kill-Saint-Anne North and Rathcormack-Mountain, Co. Cork, as set out in the particulars presented to An Coimisiún Pleanála on the 28th of August 2025, and 14th of November 2025, and location map received on the 9th of January 2026 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.



Jimmy Green

Senior Planning Inspector

Date: 9th February 2026

Appendix 1: Prescribed Bodies

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

- Department of Housing, Local Government and Heritage.
- Department of Climate Energy and the Environment.
- Cork County Council
- Transport Infrastructure Ireland
- Commission for the Regulation of Utilities
- Uisce Éireann
- Inland Fisheries Ireland
- ESB
- Eirgrid
- Health Service Executive.
- An Taisce
- Heritage Council
- An Chomhairle Ealaíon
- Fáilte Ireland
- Health and Safety Authority

Further notifications should also be made, where deemed appropriate.