



An
Coimisiún
Pleanála

Inspector's Report

ACP-323167-25

Development

Proposed development of a 110kV Air Insulated Switchgear tail-fed substation with associated grid connection.

Location

Lands at Béenaspuck, Pilgrimhill, Shronebeirne, Lacka East and Trien, County Kerry.

Planning Authority

Kerry County Council

Type of Application

Pre-Application consultation under Section 182E of the Planning and Development Act 2000, as amended.

Prospective Applicant

Knockanure Renewables (Kerry) Ltd

Date of Site Inspection

12th September 2025.

Inspector

Barry O'Donnell

1.0 Introduction

- 1.1. The Commission received a request on 18th July 2025 from the Prospective Applicant, Knockanure Renewables (Kerry) Ltd, to enter into pre-application consultations under Section 182E of the Planning and Development Act, 2000, as amended ('2000 Act'), in relation to the proposed development of: -
 - A. A 110kV Air Insulated Switchgear (AIS) tail-fed substation in the townland of Beenaspuck, together with associated underground grid connection to the Knockanure 220/110kV substation, or
 - B. An IPP power transformer in the townland of Beenaspuck, switching station in the townland of Shronebeirne and 110kV under-the-fence connection to the Knockanure 220/110kV substation.
- 1.2. One pre-application consultation meeting was held with the Prospective Applicant on 30th September 2025. A record of the meeting is on file. Following the meeting, the Prospective Applicant made email submissions on 2nd October 2025 and 9th October 2025, which contain additional details regarding Option B.
- 1.3. An email requesting closure of the consultation process was received on 13th November 2025, included within which was an instruction that a determination is required in respect of **Option A**.
- 1.4. The primary purpose of the pre-application consultation is to address the issue of whether or not the proposed development constitutes strategic infrastructure for the purposes of the 2000 Act.
- 1.5. This report provides an overview of the proposed development and a summary of the pre-application meeting, including advice provided by the Commission's representatives, and relevant legislative provisions. A list of recommended Prescribed Bodies that the application should be circulated to is provided at Appendix 1.

2.0 Site Location and Description

- 2.1. The substation site is located in a rural area, approx. 8.5km east of Listowel, and is in an agricultural field immediately east of a farmyard complex that is accessed from the R523 by a narrow local road, the L10071.
- 2.2. The site is functionally connected to a substantially larger patchwork of field sites (measuring c.354ha) in the surrounding area, which have been granted permission for a solar farm, under Kerry Co. Co. Reg. Ref. 2460605.

3.0 Proposed Development

- 3.1. The proposed development entails a 110kV AIS tail-fed substation, with an associated grid connection comprising 110kV or 220kV underground cabling that will connect to the existing 220/110kV Knockanure substation.
- 3.2. The Prospective Applicant's accompanying cover letter outlines that the substation will be located approx. 2.7km northeast of Knockanure substation and that the grid connection cable route will follow the L10071 before traversing agricultural lands for approx. 700m in order to enter the Knockanure substation site.
- 3.3. The substation is stated to incorporate separate compounds, for both Eirgrid and an Independent Power Producer or customer owned compound. Both compounds will contain control buildings, HV electrical equipment, power transformers, other electrical infrastructure and associated infrastructure including palisade fences and concrete post and rail fences.

4.0 Prospective Applicant's Case

- 4.1. The Prospective Applicant's case, as outlined in their accompanying cover letter can be summarised as follows:
 - Section 182(9) of the Act sets a threshold of 110kV for a high voltage electricity transmission line to be considered strategic infrastructure. The proposed 110kV or 220kV underground cables would therefore be considered strategic infrastructure.

- The proposed substation will transport electricity at 110kV or 220kV to the existing 220/110kV Knockanure substation via underground cables, thereby constituting 'transmission' and 'electrical plant' as defined in Section 2(1) of the Electricity Act.

5.0 Relevant Planning Records in Surrounding Area

2460605: Permission granted for a solar farm of c.143ha on lands at Knocknacaheragh, Lacka East, Rea, Trien, Pilgrimhill and Shronebeirne, Co. Kerry.

23574: Permission granted for a BESS and associated infrastructure including substation/control buildings and grid connection on lands at Shronebeirne, Co. Kerry.

PL 08.245464: Permission granted for the development of 3 No. wind turbines and associated infrastructure on lands at Beennanaspuck, Kilmorna, Listowel, County Kerry.

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 of relevance to this pre-application proposal. Recent examples include: -

ABP Ref. No.	Location	Development Description	Decision Date	Decision
ACP-323569-25	Co. Cork	Proposed 110kV substation and grid connection	22/10/25	Is SID
ACP-323441-25	Co. Kilkenny	Proposed 110kV GIS substation and grid connection	24/10/25	Is SID
ABP-322430-25	Co. Westmeath	Proposed 220kV GIS substation, high voltage lines and electric plant	7/7/25	Is SID
ABP-322289-25	Co. Kildare	Proposed 110kV substation, 110kV underground cable and a new 110kV strategic station including 6 number Line to Cable Interface Masts	14/7/25	Is SID
ABP-322217-25	Co. Dublin	Proposed 220/110kV GIS substation	11/6/25	Is SID
ABP-321855-25	Co. Carlow	Tail-fed substation with associated grid connection	14/7/25	Is SID

ABP-321687-25	Co. Limerick	110/38kV/MV substation and associated works	3/3/25	Is SID
ABP-321580-25	Co. Meath	110kV substation and cable connection	13/2/25	Is SID
ABP-319155-24	Co. Cork	110kV substation and grid connection to adjacent 220kV substation	19/6/24	Is SID
ABP-318432-23	Co. Wexford	110kV substation and 110kV overhead loop-in cable	1/2/24	Is SID
ABP-315972-23	Co. Louth	2 No. 110kV substations and grid connections	1/6/23	Is SID
ABP-315476-23	Co. Clare	110kV substation and associated grid connection	6/6/23	Is SID
ABP-315433-23	Co. Kildare	220kV Air Insulated Switchgear tail-fed substation with associated 220kV underground grid connection	8/5/23	Is SID
ABP-313676-22	Co. Wexford	110kV tail-fed substation and associated grid connection	1/11/22	Is SID

7.0 Legislative Provisions

Planning and Development Act, 2000, as amended

- 7.1. 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)"

- 7.2. 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.

- 7.3. 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."*

7.4. 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.

Electricity Regulation Act 1999, as amended

7.5. 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”.

8.0 Consultation Meeting

- 8.1. One pre-application consultation meeting was held with the Prospective Applicant, on 30th September 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 comprises a 110kV AIS tail-fed substation, with an associated grid connection comprising 110kV or 220kV underground cabling that will connect to the existing 220/110kV Knockanure substation. The Prospective Applicant states that the substation and grid connection are intended to serve a

proposed solar farm development on lands at Beenaspuck, Pilgrimhill, Shronebeirne, Lacka East and Trien, County Kerry. The Prospective Applicant is seeking a determination from the Commission as to whether the development is or is not strategic infrastructure development and I note from the pre-application submission documents that they consider that it is strategic infrastructure development.

9.2. 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).

9.3. Under Section 182A of the Planning and Development Act, 2000 (as amended), an undertaker shall apply to the Commission for approval of a development comprising or for the purposes of energy transmission. Section 182A (9) sets a threshold of 110kV, in order for a high-voltage transmission line to be considered strategic infrastructure, for its purposes. The Act does not provide a threshold for a substation, however; the Commission will note that the subject proposal includes 110kV infrastructure, in terms of both the substation and connecting cables and the applicant also states that the proposal will be connected to the adjacent existing Knockanure 220/110kV substation. I consider the proposed substation and grid connection fall within the definition of transmission, in accordance with Section 2(1) of the Electricity Regulation Act, 1999.

9.4. I have previously outlined at Section 6 of this Report a number of precedent pre-application cases in relation to electricity transmission infrastructure under S182E, where the Commission determined that the provision of a 110kV substation and grid connection cabling acting as a node on the transmission system constitutes Strategic Infrastructure Development. I consider these cases are directly related to the current proposal.

- 9.5. Thus, from the information available to me, I am of the opinion that the proposal constitutes strategic infrastructure.
- 9.6. In conclusion, therefore, I recommend that the Commission issue a determination that the proposed development consisting of a 110kV AIS tail-fed substation with associated grid connection falls within the scope of section 182A of the 2000 Act, as amended, and that a planning application should be made directly to the Commission.
- 9.7. A list of prescribed bodies is set out in Appendix 1.

10.0 Recommendation

- 10.1. I recommend that the Prospective Applicant, Knockanure Renewables (Kerry) Ltd, be informed that the proposed development of a 110kV AIS tail-fed substation with associated grid connection to Knockanure 220/110kV substation, as set out in the plans and particulars received by An Coimisiún Pleanála on 18th July 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.



Barry O'Donnell
Senior Planning Inspector

11th December 2025.

Appendix 1 – Prescribed Bodies

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

- Department of Housing, Local Government and Heritage.
- Department of Climate, Energy and the Environment.
- Commission for the Regulation of Utilities
- Transport Infrastructure Ireland
- Kerry County Council
- Southern Regional Assembly
- Inland Fisheries Ireland
- Waterways Ireland
- ESB
- Eirgrid
- The Heritage Council
- An Taisce
- Failte Ireland
- Health and Safety Authority

Further notifications should be made where deemed appropriate.