An Bord Pleanála

Inspector's Report
ACP-323901-25

Development	Proposed 220kV substation and associated development, along with an associated 220kV transmission line connection to serve the proposed substation.
Location	Lands at Kilmeaden to the South of the R680, within the townlands of Blackknock, Co. Waterford
Planning Authority	Waterford County Council.
Type of Application	Pre-application consultation under section 182E of the Planning and Development Act 2000, as amended.
Prospective Applicant	**Crag Rathnew DC Limited**
Inspector	Sarah Lynch

1.0 Introduction

1.1. The Commission received a request on 18th November 2025 from the prospective applicant, Crag Rathnew DC Limited, 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 220kV substation and a 220kV transmission line within the townlands of Blackknock, Co. Waterford.

1.2. 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.

1.3. A meeting was held on the 2nd March 2026 in which a preliminary opinion that the proposed development falls within the scope of Strategic Infrastructure Development was discussed. The Commission should note that reference is made within the pre application request letter to the uncertainty of the proposed grid connection route. The final route has been selected by the prospective applicant and was presented at the pre application meeting.

1.4. This report provides an overview of the proposed development, as well as details of legislative provisions, and relevant precedents.

2.0 Site Location & Description

2.1. The subject site is located on lands adjacent to the settlement of Kilmeaden, County Waterford. The substation site currently comprises greenfield land, within a wider site which is subject to a live permission for a mixed use development. The overall landholding / development lands extend to 108.64 ha and are located near the village of Kilmeaden, to the south of the R680, within the townland of Blackknock.

2.2. Kilmeaden is located c. 9 km to the west of Waterford City Centre and close to the N23 to the north enabling convenient access to the national road network.

3.0 Proposed Development

The Proposed Development will include a 220kV electrical substation and grid connection which are required to facilitate a large mixed use development directly

abutting the proposed site. A planning application is under consideration Ref: 2560625 by Waterford County Council for the mixed use scheme.

4.0 Planning History

4.1. There is no recent planning history for the proposed site, the following Is under consideration by Waterford County Council:

WCC 2560625 - the development of the former cheese factory site and adjoining lands to provide for a mixed-use village centre, technology park, and renewable energy development on a total site area of 108.79 hectares.

Permitted developments in proximity to proposed site:

WCC 16/309 - development consisting of a 10 year permission for the construction of a Solar PV Energy development within a total site area of up to 11.5hA, to include one single storey electrical substation building.

WCC 16737 - ground-mounted solar photovoltaic (PV) farm to generate renewable electricity on a 26.5ha site, comprising solar arrays, associated electrical infrastructure, fencing, access improvements and ecologically beneficial landscape work.

WCC 1932 – Amendment to layout permitted under 16737

5.0 Prospective Applicant's Case

5.1. The prospective applicant's case, as outlined in the cover letter submitted can be summarised as follows:

The proposed development of a 220kV substation and 220kV grid connection falls within Section 182 A of the Planning and Development Act 2000 and is considered to be strategic infrastructure development as it exceeds the threshold of 110kV for such development.

6.0 Relevant Precedents

6.1. The prospective applicant cites a number of cases where the Commission determined that similar development comprised SID under s182A. Those cases, and others that I consider to be of relevance, include:

ABP Ref. No.	Location	Development Description	Decision Date	Decision
320535-24	in the townlands of Walterstown and Dunboyne, County Meath.	Proposed development of a new 110kV/38kV/MV substation on a site located approximately 3km west of Hansfield Rail station	25/10/24	Is SID
319735-25	Donore Road, Drogheda, Co Meath	Installation of a new 110kV / 38kV/MV distribution on a 1.64ha site north of the Drogheda IDA Business and Tech Park.	16/08/24	Is SID

7.0 Legislative Provisions

7.1. Planning and Development Act 2000, as amended

7.1.1. Section 2(1) of the 2000 Act, as amended, defines 'strategic infrastructure' as including, inter alia:

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

7.1.2. Under subsection 182A(1) of the 2000 Act, as amended, 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.

7.1.3. 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."

7.1.4. 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.

7.2. Electricity Regulation Act 1999, as amended

7.2.1. 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 Comission 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 Comission."
- '**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

(c) 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. As noted above, 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).

The proposed development will comprise the construction of a 220kV substation and grid connection to facilitate the operation of a mixed use development which will include a BESS element directly adjacent to the proposed development site. The Commission should note that the proposed transmission line connection to serve the proposed substation will also form part of the transmission network and will carry a voltage of 220kV.

Having regard to the foregoing and based on the statutory definition and the information contained in the prospective applicant's request, I am satisfied that the proposed substation and associated 220kV grid connection falls within the scope of transmission. I note that this is consistent with previous determinations by the Commission.

In conclusion, therefore, I recommend that the Commission issue a determination that the proposed 220kV substation and grid connection at Blackknock Waterford, does fall within the scope of section 182 A of the 2000 Act, as amended, and that a planning application should be made directly to the Commission.

A list of prescribed bodies is set out in Appendix 1

9.0 Recommendation

9.1. I recommend that the prospective applicant, Crag Rathnew DC Limited, be informed that the proposed development, consisting of a 220kV grid connection and 220kV substation, located at Blackknock Waterford as set out in the plans and particulars received by An Coimisiún Pleanála on the 18th November 2025, 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 to the Commission, in the first instance.

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.

Sarah Lynch
Assistant Director of Planning

Date: 27th April 2026

Appendix 1: Prescribed Bodies

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

- Minister for Housing, Local Government and Heritage
- Minister for the Environment, Climate and Communications
- Waterford County Council
- Commission for the Regulation of Utilities
- Transport Infrastructure Ireland
- Uisce Éireann
- Inland Fisheries Ireland
- Office of Public Works
- An Taisce
- Heritage Council
- An Chomhairle Ealaíon
- Fáilte Ireland