



An
Coimisiún
Pleanála

Inspector's Report ABP-323975-26

Development	Proposed development of a new distribution 110kV/38kV (medium voltage) substation at a site in the IDA Business and Technology Park
Location	Clonroosk Little, Portlaoise, County Laois.
Planning Authority	Laois County Council
Type of Application	Pre-application consultation under section 182E of the Planning and Development Act 2000, as amended
Prospective Applicant	ESB
Inspector	Sarah Lynch

1. Introduction

The Commission received a request on 19th December 2025 from the prospective applicant, ESB, 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 new distribution 110kV/38kV (medium voltage) substation at a site in the IDA Business and Technology Park.

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.

A record of the written consultations undertaken is on file.

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

2. Site Location & Description

The proposed development will be located within the IDA Business and Technology Park which is accessed via the Mountrath Road. The site is bounded to the north west by existing residential lands. The business park is currently under construction with a number of units completed and operational and some active construction. It is of note that all roads, footpaths and lighting are complete for the business park. Large electricity towers and polesets traverse the site at present.

3. Proposed Development

It is proposed to construct a new loop in loop out substation which will consist of the following elements:

- Provision of a new 110/38 & 110 / 20kV GIS electrical substation
- Removal of four existing 110kV overhead line masts
- Construction of new substation compound
- 110kV GIS building with 8 x 110kV bays
- 38kV / MV GIS building with 12 x 38 kV bays and 16 MV bays

- 2 no. 110 / 38 kV 63 MVA transformers in transformer bays with associated electrical equipment.
- 2no. 110kV MV 31.5 MVA transformers in transformer bays with associated electrical equipment.
- Three ARC – Suppression Coils with associated electrical equipment
- 2 new 110kV double circuit overhead line / cable interface end masts
- 110kV underground cabling between the 110kV GIS building and new line cable interface end masts
- Ancillary outdoor electrical equipment
- Ancillary site development works, roads, lighting, boundary treatment etc.

The substation will be a combined distribution and transmission which will be owned by ESB networks.

4. Prospective Applicant's Case

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

- ESB has committed to delivering a net zero ready electricity distribution network by 2040 to enable Ireland to meet its legally binding net zero target by 2050. Significant investment is required over the next decade to build the distribution capacity to enable connections to renewable and cater for increased demand.
- Portlaoise future growth scenarios indicate a significant increase in demand. The proposed substation is located in a prime location to cater for this increase. The proposed substation will also address current overloading issues in the electricity system in the surrounding area and will improve continuity and security of supply for the area.
- The proposed new substation will comprise both distribution and transmission, whilst there is not threshold relating to substation capacity it is considered by ESB that the proposed substation and associated 110kV overhead and underground cables would constitute Strategic Infrastructure Development and

would fall under Section 182 A of the Planning and Development Act, as amended.

5. Relevant Precedents

The following recent decisions I consider to be relevant to the consideration of this case:

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

6. Legislative provisions

6.1 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.

6.2 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".

7. Consultation Meeting

A meeting was not held in respect of this case. A written record of the consultations undertaken have been attached to the file.

8. Assessment

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 is to be a combined transmission and distribution substation with the 110kV circuits feeding the substation, the 110kV GIS building and the 110kV transformers forming part of the 110kV transmission network operated by EirGrid. The 38kV & MV electrical equipment will be part of the distribution network operated by ESB. In essence the proposed substation will become a node on the transmission networks and will facilitate the looping in and out of electricity via 110kV lines both overhead and underground.

Thus, 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 development substation and associated 110kV cables 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 110kV substation at Clonroosk Little Portlaoise 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. Recommendation

I recommend that the prospective applicant, ESB, be informed that:

- (i) Proposed development of a new distribution 110kV/38kV (medium voltage) substation at a site in the IDA Business and Technology Park 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.

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: 04/03/2026



Appendix 1: Prescribed Bodies

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

- Minister for Housing, Local Government and Heritage
- Minister for the Environment, Climate and Communications
- Laois 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