



An
Coimisiún
Pleanála

Inspector's Report ABP-323976-26

Development	Proposed uprating of 2 no. existing circuits, as follows: (1) Great Island-Lodgewood 220kV line Uprate (2) Blundelstown – Mullingar 110kV Line Uprate
Location	Great Island and Lodgewood, south of Ferns, Co. Wexford and (2) Located in Blundelstown Co. Meath and Mullingar, Co. Westmeath.
Planning Authority	Westmeath County Council
Type of Application	Pre-application consultation under section 182E of the Planning and Development Act 2000, as amended
Prospective Applicant	Eirgrid
Inspector	Sarah Lynch

1. Introduction

The Commission received a request on 12th December 2025 from the prospective applicant, EirGrid PLC, 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 uprating of 2 no. existing circuits at Great Island and Lodgewood, south of Ferns, Co. Wexford and (2) Located in Blundelstown Co. Meath and Mullingar, Co. Westmeath.

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 is located at two different sites as follows:

Great Island

This element is stated to commence in Great Island 220kV substation in Co. Wexford and extend north to Lodgewood 220kV substation south of Ferns in Co. Wexford. The works are largely above agricultural lands and cross the Slaney River Valley SAC.

Blundelstown – Mullingar

This element is located above lands in both Meath and Westmeath commencing at Blundelstown 110kV substation in Meath and extending northwest to Mullingar 110kV substation which is located northwest of Mullingar town. This element of the works will cross the River Boyne and River Blackwater SAC and will also traverse over agricultural lands.

3. Proposed Development

The proposed development comprises the upgrading of and refurbishing of an existing asset in order to facilitate higher efficiencies in the transmission of

electricity. The primary works proposed are stated to include the replacement of the electricity line conductor which will result in works to the lattice towers and wooden polesets to support the electricity line conductor. Ancillary works to the corresponding substations to integrate the electricity line conductor will also be required. Specific works at each location are as follows:

Great Island – Lodgewood 220kV

- Replacement Conductors
- Steel work replacement towers
- Foundation strengthening of towers
- Replacement of equipment and apparatus on towers
- All ancillary site development works including site preparation works hard standing, temporary access and construction compounds

Blundelstown – Mullingar 110kV

- Full tower and foundation replacement required at 14 tower locations
- Shear block remedial work is required at 3 tower locations
- Member only replacement at 3 tower locations
- Tower painting at 19 tower locations
- 1 no. poleset replacement due to suspected scrantepo poles
- 245 no. poleset replacement due to loading
- 24 no. poleset replacement due to condition
- 45 no. poleset replacement due to clearance
- 83 no. crossarms replacement due to loading
- Replacement of all hardware for 430 ACSR 'BISON'
- Replacement of 17 no. stayed assemblies

4. Prospective Applicant's Case

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

- The proposed circuit uprates form part of a larger suite of circuit uprates that are being progressed on the national grid to aid the integration of future renewable generation and alleviate some of the constraints on the network.
- The Commission should note that the proposed development is located at two different locations but forms part of a single project; this approach has been accepted by the Commission previously e.g. 321825-25.
- The planned development is considered normally to fall within the definition of exempted development as per the section 31 4(1)(g).
- Preliminary screening for Appropriate Assessment has concluded that the AA is likely to be required for the proposed works and as such it is considered by EirGrid that the proposed development is not exempted development as per Section 4(4) of the Planning and Development Act 2000.
- EirGrid considers that given the scale, nature and function of the proposed development on the transmission network and given that the projects relate to existing and long established circuits and having regard to Section 37(A)(2) of the Planning and Development Act 2000 as amended the proposed development does not comprise Strategic Infrastructure Development.
- EirGrid refers to several recent cases outlined below.

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
321825	Various	Proposed uprating of 2 no. existing 110kV Circuits as follows: Athy to Carlow 110kV Circuit, Cashla to Dalton 110kV Circuit and Castlebar to Dalton 110kV	21/03/25	Not SID

315693	Various	Upgrading of 4 no. existing 110 kV circuits and 1 no. existing 220 kV circuit.	24/07/23	Not SID
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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).

Based on this statutory definition and the information contained in the prospective applicant's request, I am satisfied that the 2 no. existing 220kV and 110kV circuits the subject of this pre-application consultation can reasonably be considered to form part of the transmission network for the purpose of the Planning Act. The works the subject of this pre-application consultation request relate to the upgrading and refurbishment of established infrastructure and would comprise typical uprate works

to improve efficiency. As outlined above, the primary works proposed relate to the replacement of electricity line conductors which necessitate the replacement of polesets, lattice towers components and other ancillary works such as painting.

The proposed works will not alter the route of the existing cables and will not alter the fundamental appearance or function of the existing infrastructure. Such works as mentioned by the prospective applicant are normally considered exempt development. This proposed development by virtue of traversing 2 no SACs requires a stage 2 Appropriate Assessment and is therefore subject to the limitations of such exemptions and required planning permission to be obtained.

As outlined above, the Board has previously determined a considerable number of requests for pre-application consultation in relation to proposed improvement / refurbishment / upgrade works to existing electrical infrastructure. In particular, I note the recent cases ABP-321825 and 315693.

The Board concluded in these, and other similar cases, that the development did not fall within the scope of section 182A of the 2000 Act, as amended, and consequently that planning applications should be made in the first instance to the local planning authority.

Having regard to the nature and scale of the proposed development, the fact that it relates to an uprating of existing infrastructure, and noting previous determinations by the Board in respect of similar requests for pre-application consultation, I conclude that the proposed development would not fall within the scope of section 182A of the Planning and Development Act 2000, as amended, necessitating the making of an application directly to the Board.

In conclusion, therefore, I recommend that the Commission issue a determination that the: Proposed uprating of 2 no. existing circuits, as follows: (1) Great Island-Lodgewood 220kV line Uprate (2) Blundelstown – Mullingar 110kV Line Uprate does not fall within the scope of section 182A of the 2000 Act, as amended, that a planning application for these elements should be made to the relevant Local Authorities, in the first instance.

9. Recommendation

I recommend that the prospective applicant, EirGrid PLC, be informed that:

- (i) Proposed uprating of 2 no. existing circuits, as follows: (1) Great Island-Lodgewood 220kV line Uprate (2) Blundelstown – Mullingar 110kV Line Uprate, does not fall within the scope of section 182A of the Planning and Development Act 2000, as amended, and that a planning application should be made in the first instance to the relevant local planning authorities.

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

