



An
Bord
Pleanála

Inspector's Report ACP-324295-26

Development	Proposed development of an energy storage facility and associated works.
Location	Lands at Lettermore, County Donegal.
Planning Authority	Donegal County Council.
Type of Application	Pre-application consultation under section 182E of the Planning and Development Act 2000, as amended.
Prospective Applicant	FutureEnergy.
Inspector	Philip Davis

1.0 Introduction

- 1.1. The Commission received a request on 11th May 2026 from the prospective applicant, FutureEnergy Ireland Development DAC, 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 an energy storage facility and associated works at lands at Lettermore, County Donegal.
- 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 pre-application meeting was held with the prospective applicant on 6th August 2026. Correspondence requesting closure of the consultation process was received on the 11th August 2026.
- 1.4. This report provides an overview of the proposed development, as well as details of legislative provisions, and relevant precedent.

2.0 Site Location & Description

- 2.1. The site is located in the townland of Lettermore, County Donegal, c. 13km south of Letterkenny in the rural area. An existing substation is located adjacent to the proposed development site, and the lands are traversed by a 110kV transmission line overhead. The lands are currently utilised for forestry.
- 2.2. The site is characterised by steep topography, which is underlain by quaternary deposits primarily consisting of peat and till material and is currently largely covered with commercial forestry. The Dee River runs to the north with the village of Cloghrow about 2 km to the south-east. There are no Natura 2000 sites within the site area.

3.0 Proposed Development

- 3.1. The proposed development comprises 33kV Collector Network and UTF transformer connection along with works to existing 110kV Drumkeen Substation. Part of the project, but not included in the pre-application request, is an LDES (Long Duration

Energy Storage) compound containing iron-air batteries. These units will be arranged in an array across the site in concrete plinths.

- 3.2. The proposed UTF (Under the fence) transformer compound will measure a total area of 0.37 hectares and includes power transformers, modular control buildings and all ancillary equipment associated with the UTF grid connection. This is intended to facilitate the LDES.
- 3.3. The proposed Modular Control Building will be a structure finished in high grade steel, approximately 18.4 metres in length, 4 metres wide and 4.87 metres high on a total area of 358 sqm. Associated electrical cabling will be underground.
- 3.4. An additional bay and busbar is required at the existing Drumkeen 110kv substation. This is to serve a single private development (i.e. the DLES compound). It will include a back up diesel generator, a neutral earthing resistor, an auxiliary house transformer, an interface kiosk, marshalling kiosks and harmonics filter.
- 3.5. The purpose of the development is to enable the connection of a proposed LDES facility to the national grid and power to be exported onto the grid network. The medium-voltage power generated by the permitted LDES development will be stepped up to 110kV to connect to the transmission system via the Drumkeen 110kV Substation.

4.0 Planning History

- 4.1. There is no relevant planning history for the site – it is proposed to connect to the existing Drumkeen 110kV network sub station. The LDES will be subject to a separate application.

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 does not fall within the Section 182 A of the Planning and Development Act 2000 for the following reasons:

- The proposed UTF Transformer Compound is small scale Independent Power Producer facility intended to facilitate an electrical connection to EirGrid's

110kV Drumkeen substation. It will not form part of the national transmission grid and will not act as a node in the grid. It will connect to an existing node on the grid and will not itself be a node on the grid.

- The UTF Transformer Compound and the 110kV Drumkeen Substation works will only serve a single private development and will not serve wider local or regional development
- The UTF connection to the adjacent 110 kV Drumkeen substation is only required to step up the 33 kV supply from the proposed LDES Facility to 110kV. The works on the 110kV Drumkeen substation are facilitate the connection of the LDES facility only.
- Comparable precedent cases considered by An Coimisiún Pleanála, formerly An Bord Pleanála, involving proposals for 110 kV transformers and works on the existing 110kV Substations have been determined not to constitute Strategic Infrastructure.
- The proposed UTF Transformer Compound and substation works, together with the associated generating capacity of the prospective LDES Facility are entirely located within the functional area of Donegal County Council

6.0 Relevant Precedents

- 6.1. The prospective applicant cites a number of cases where the Commission determined that similar development comprised Not SID under s182A. Those cases, and others that I consider to be of relevance, include:

ABP Ref. No.	Location	Development Description	Decision Date	Decision
316369	Ardgoulbeg, Rathkeale, Co. Limerick	Transformer compound connecting proposed solar farm to Rathkeale 110kV substation.	14/06/23	Not SID
318491	Knockanure Co. Kerry	Proposed 33kV/110kV transformer connection to a solar farm.	27 th March 2024	Not SID

301672	Kellistown East, Co. Carlow	110kV transformer and connection to the national grid with an energy storage facility.	30 th October 2018	Not SID
301675	Caherdowney, Co. Cork	Battery energy storage facility, 110kV substation and associated development	30 TH October 2018	Not SID
301705	Athenry Co. Galway	110kV substation and connection to the national grid to serve a proposed Energy Storage facility	26 th October 2018	Not SID
311993	West Offaly Power Station, Shannonbridge, Co. Offaly	Electrical development associated with a proposed Battery Energy Storage System (BESS).	17 th January 2022	Not 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 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
 - (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 Consultation Meeting

- 8.1. A meeting was held on 6th August 2026 in respect of this case. The principal matters discussed at the pre-application consultation meeting related to the purpose of the proposals and the nature of the electrical plant and equipment proposed.
- 8.2. The relevant meeting record and presentation made by the prospective applicant to the Commission's representative are attached to the file.

9.0 Assessment

9.1. 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).

9.2. Based on this statutory definition and the information contained in the prospective applicant's request, I am satisfied that the existing substation can be regarded as part of the electricity transmission system for the purposes of the 2000 Act (as amended).

9.3. The prospective applicant will construct and operate a LDES (Long Duration Energy Storage) facility adjacent to the proposed development site. I note the LDES facility will store electricity from the national grid and feed it back in to meet demand. The LDES facility will operate in medium voltage. The stated purpose of the proposed development is to connect the LDES facility to the existing Drumkeen 110kV Substation and the national electricity network via a 110kV transformer compound and under-the-fence cable connection. The 110kV transformer is required to step-up electricity being exported from the LDES facility to the national grid.

9.4. The proposed transformer will only serve the LDES facility. It will be an IPP facility and does not comprise a substation in its own right. Furthermore, it will not alter the nature or function of the Drumkeen 220kV substation. As above, the transformer compound will only facilitate the connection between the LDES facility and the existing substation and the stepping-up/down of the voltage and releasing/receiving electricity to/from the national grid.

9.5. As outlined above, the Commission has previously determined a considerable number of requests for pre-application consultation in relation to the installation of

transformer compounds at or in the vicinity of existing substations. In particular, I note references ABP-316369-23 and ABP-321030-24 which relate to transformer compounds to facilitate the connection of BESS or LDES facilities to the national grid. The Commission has consistently concluded in these, and other similar cases, that the proposed 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.

9.6. Therefore, having regard to:

- The intended purpose of the proposed development, comprising an under-the-fence transformer compound to facilitate the connection of an LDES facility to the Drumkeen 110kV Substation
- Previous determinations by the Commission in respect of similar requests for pre-application consultation, as referenced above.

9.7. I consider that the proposed development would not constitute strategic infrastructure. In conclusion, therefore, I recommend that the Commission issue a determination that the proposed development does not fall within the scope of section 182A of the 2000 Act, as amended, and that a planning application should be made to Donegal County Council, in the first instance.

10.0 Recommendation

I recommend that the prospective applicant, Future Energy, be informed that the proposed development, consisting of an under-the-fence transformer compound and 33kV underground cabling connection to the Drumkeen 110kV Substation and associated development, located at Lettermore, County Donegal as set out in the plans and particulars received by An Coimisiún Pleanála on the 11th May 2026, 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 to Donegal County Council, 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.

A handwritten signature in black ink, appearing to read 'Philip Davis', is written over a horizontal line.

Philip Davis

Senior Planning Inspector

Date: 14th August 2026