

An
Coimisiún
Pleanála

Inspector's Report **ACP-324385-26**

Development	Proposed Barrymore 110kV Busbar and new 110/38kV Transformer
Location	Located in the townland of Kill-Saint-Anne North, County Cork.
Prospective Applicant	EirGrid plc.
Type of Application	Application under 182E of the Planning and Development Act 2000, as amended.
Planning Authority	Cork County Council
Date of Site Inspection	8 th July 2026
Inspector	Liam Bowe

1. Introduction

The Commission received a request on 22nd April 2026 from the prospective applicant, EirGrid, 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 110kV busbar and new 110/38kV transformer at the existing Barrymore substation at Kill-Saint-Anne North, Co. Cork.

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.

This report provides an overview of the proposed development, as well as details of legislative provisions, and relevant precedents. My recommendation is that the proposed development does not constitute strategic infrastructure development.

2. Site Location

The existing Ballymore 220kV substation is located in the townland of Kill-Saint-Anne, Co. Cork. The subject site is located on the southwestern side of, and accessed from, a local road. This local road links the village of Castlelyons c.1km to the southeast to the town of Fermoy c.5km to the north via the R639 regional road. The M7 motorway is located c.2km to the west of the subject site.

The site of the proposed development is not located within or adjoining any European Sites. The nearest sites are Blackwater River (Cork/Waterford) SAC (Site code: 002170), located c.1.7km to the south and c.4.8km to the north of the site. The Blackwater Callows SPA (Site code: 004094) is also located c.4.8km to the north of the site. Similarly, Blackwater River Callows pNHA, Blackwater Valley (The Beech Wood) pNHA, Blackwater Valley (Cregg) pNHA and Blackwater Valley (Killathy Wood) pNHA are located approximately 4.8km, 5km, 6.8km and 8.4km to the northwest the site, respectively. The Bride/Bunaglanna pNHA is also located approximately 11.4km to the southwest of the site.

3. Description of Proposal

The application includes a Site Layout Map (Drawing No. XDN-LAY-CP1490-H-BAR-001 refers) which highlights the extension to the existing hardstanding area with additional electrical infrastructure.

The proposed development is described as comprising the following elements:

- A new 4 plus 2 bay C-type AIS 110kV busbar.
- A new 110/38kV transformer with an extension to the control room.
- Extension of the fence line boundary to the west, east, and south of the existing substation.
- Extension to the existing hardstanding area.

The upgrade works to the existing Barrymore substation is part of an EirGrid project (CP1490) to bring the electricity transmission infrastructure on the Knockraha – Barrymore – Cahir 110kV circuit up to EirGrid Transmission System Security and Planning Standards (TSSPS).

4. Prospective Applicant's Case

The prospective applicant's case, as outlined in the cover letter submitted, states that the upgrade of the existing substation is described as essential in order to bring the electricity transmission infrastructure on the Knockraha – Barrymore – Cahir 110kV circuit up to TSSPS. At present, the Barrymore substation and network surrounding the substation are in breach of these standards, and this issue needs to be addressed by EirGrid. The upgrade will also enable EirGrid to more easily schedule outages to allow maintenance, repair, reinforcement and upgrade works on the local transmission network.

EirGrid highlight that the Commission have determined in previous cases that similar development was not strategic infrastructure. It is, therefore, argued that the development does not constitute SID.

5. Planning History

ACP-324274-26: Current application for the proposed development of a 110kV onsite substation and 110kV Underground Cable (UGC) Grid Connection Route and associated works that link to the Ballymore substation and with the consented Coom Green Energy Park development.

ACP-323301-25: 10-year permission for a solar farm on a c.42.72ha site to the south of the substation.

P.A. Ref. No. 24/6468: Permission granted for refurbishment works to 39.3km of overhead line, 14 no. steel towers and 204 no. wooden polesets between Knockraha Substation, in the townland of Ballynenelagh, and the border with County Tipperary, including, *inter alia*, the installation of 5 no. new towers and 1 new no. poleset at Barrymore Substation and the removal of 2 no. towers.

6. Precedent Cases

The prospective applicant cites a large number of cases where the Commission determined that similar development is not SID under S.182A. These cases, and others that I consider to be of relevance, I have outlined below for the Commission's information.

ABP Ref. No.	Location	Development Description	Decision Date	Decision
314505	Fingal	Proposed upgrade of the existing Belcamp 220kV electrical substation	2023	Not SID
314767	Dublin	Upgrading of the existing Poolbeg 200kV electrical substation	2023	Not SID
314111	Meath	Upgrading of the existing Woodland 400/200kV electrical substation	2022	Not SID
313931	Offaly	Upgrading of the existing Derryiron 110kV electrical substation	2022	Not SID

313964	Kildare	Proposed redevelopment of the existing Maynooth 220kV / 110kV electrical substation	2022	Not SID
311950	Mayo	Modification and upgrade of the Dalton 110kV substation.	2021	Not SID
303148	Kildare, Clare and Galway	Installation of series capacitors at three existing 400 kV electrical substations.	2021	Not SID
306908	Cork	Proposed development of a 110kV control room at the existing Trien 220/110kV electricity substation and all associated site works.	2020	Not SID
301174	Cork, Kerry and Tipperary	New STATCOM devices at three existing electrical substation sites	2018	Not SID
300928	Cork	Redevelopment of the existing 110kV Kilbarry Electrical Substation	2018	Not SID
VC0110	Galway	Redevelopment of the existing 110kV Galway Electrical Substation	2017	Not SID
VC0109	Kerry	New Reactor at the existing Knockanure 220kV Electrical Substation	2017	Not SID
VC0101	Dublin	Redevelopment of the existing 220kV Inchicore Electrical Substation	2016	Not SID
VC0070	Dublin	New Reactors at existing Poolbeg 220/110kV Electrical Substation	2013	Not SID
VC0061	Clare	Redevelopment of the existing 110kV Ardnacrusha Electrical Substation	2011	Not SID

VC0055	Clare	Redevelopment of the existing 400kV Moneypoint Electrical Substation	2011	Not SID
VC0040	Fingal	Redevelopment of the existing 220kV Finqlass Electrical Substation	2010	Not SID

7. Legislative Provisions

7.1 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 Board 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 Board 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 Board 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 Board."

- **'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 Board 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. Consultation Meeting

A pre-application consultation meeting was not held in this instance. A record of written consultation has been placed on the file.

9. 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 the information contained in the prospective applicant's cover letter, it is evident to me that the existing 110kV substation can be considered to form part of the electricity transmission system for the purposes of the Planning Act.

The details provided with the request are somewhat limited, not including detailed drawings or plans in respect of the proposed development, other than a Site Layout Plan. However, the written description in the accompanying cover letter is considered to have adequately described the nature, scope and purpose of the proposed development.

This pre-application consultation request relates specifically to the proposed development of a 110kV busbar and new 110/38kV transformer at the existing Barrymore substation with associated extension to the existing hardstanding area and extension of the fence line boundary to the west, east, and south of the existing substation. The stated purpose for the proposed works is to bring the electricity transmission infrastructure on the Knockraha – Barrymore – Cahir 110kV circuit up to TSSPS.

The prospective applicants have indicated their opinion that the proposed development does not constitute strategic infrastructure under s.182A.

In this case, the proposed development would not give rise to any fundamental change in the function, operation or purpose of the existing substation infrastructure at this location, nor would there be any material deviation of the routes of established

electrical circuits. Although the existing compound will be extended to the south, east and west, I do not consider that any significant visual or landscape impacts will arise given the site location and characteristics, and the distances from sensitive receptors.

As outlined in Section 5 above, the Commission has previously determined a considerable number of requests for pre-application consultation in relation to electricity transmission infrastructure under S.182E involving amendments, additions, replacement and expansion of electricity infrastructure, which I consider to be relevant. The Commission has previously determined that such development does not fall within the scope of section 182A of the Planning Act and consequently that a planning application should be made in the first instance to the local planning authority.

In conclusion, therefore, I recommend that the Commission issue a determination that the proposed development of a 110kV busbar and new 110/38kV transformer at the existing Barrymore substation with associated extension to the existing hardstanding area and extension of the fence line boundary to the west, east, and south of the existing substation at Kill-Saint-Anne North, Co. Cork does not fall within the scope of section 182A of the 2000 Act, as amended, and that a planning application should be made to Cork County Council in the first instance.

10. Recommendation

I recommend that the prospective applicant, EirGrid plc., be informed that:

the proposed development of a 110kV busbar and new 110/38kV transformer at the existing Barrymore substation with associated extension to the existing hardstanding area and extension of the fence line boundary to the west, east, and south of the existing substation at Kill-Saint-Anne North, Co. Cork 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 Cork County Council.

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.

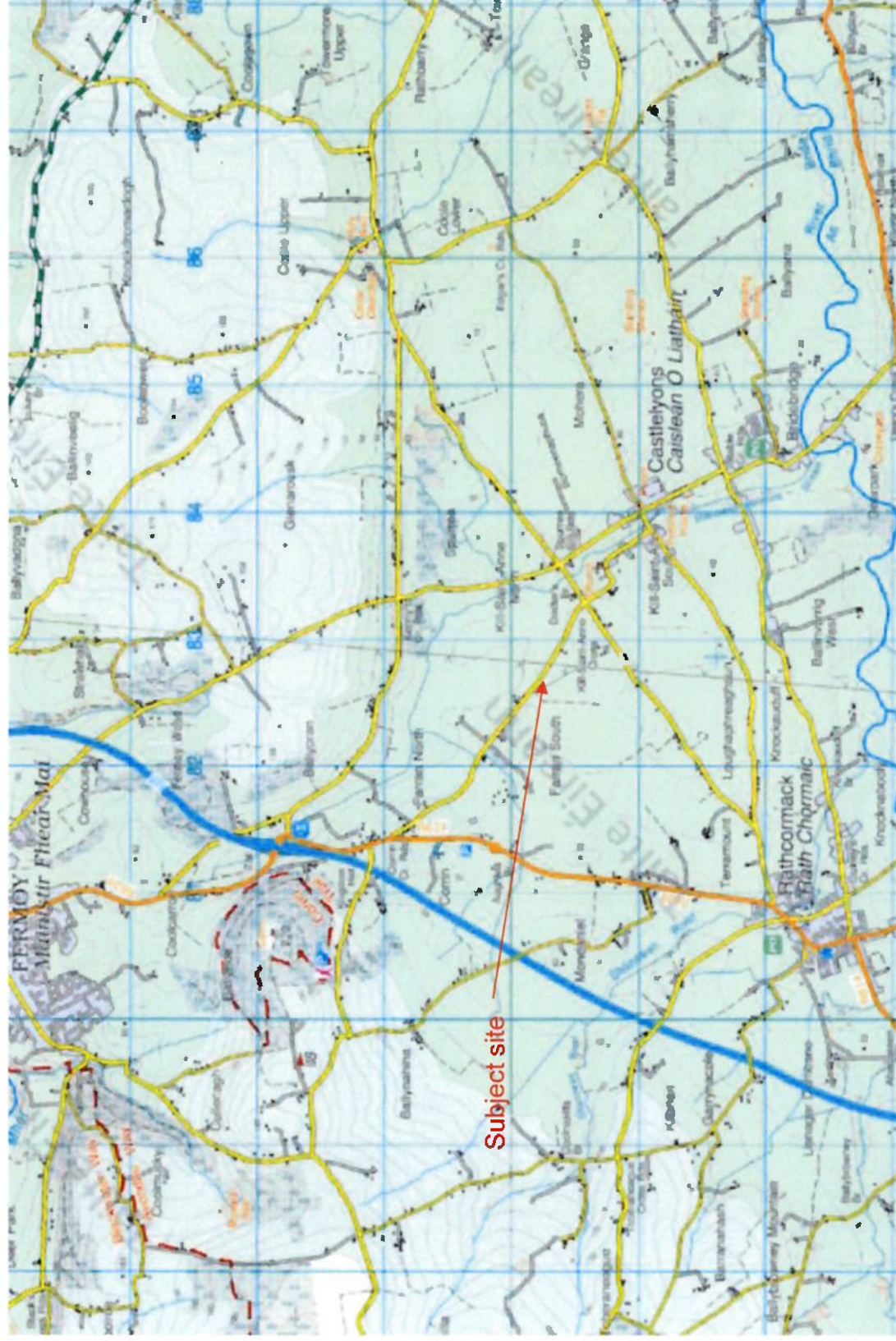


Liam Bowe

Senior Planning Inspector

11th August 2026

Site Location Map



Key Map

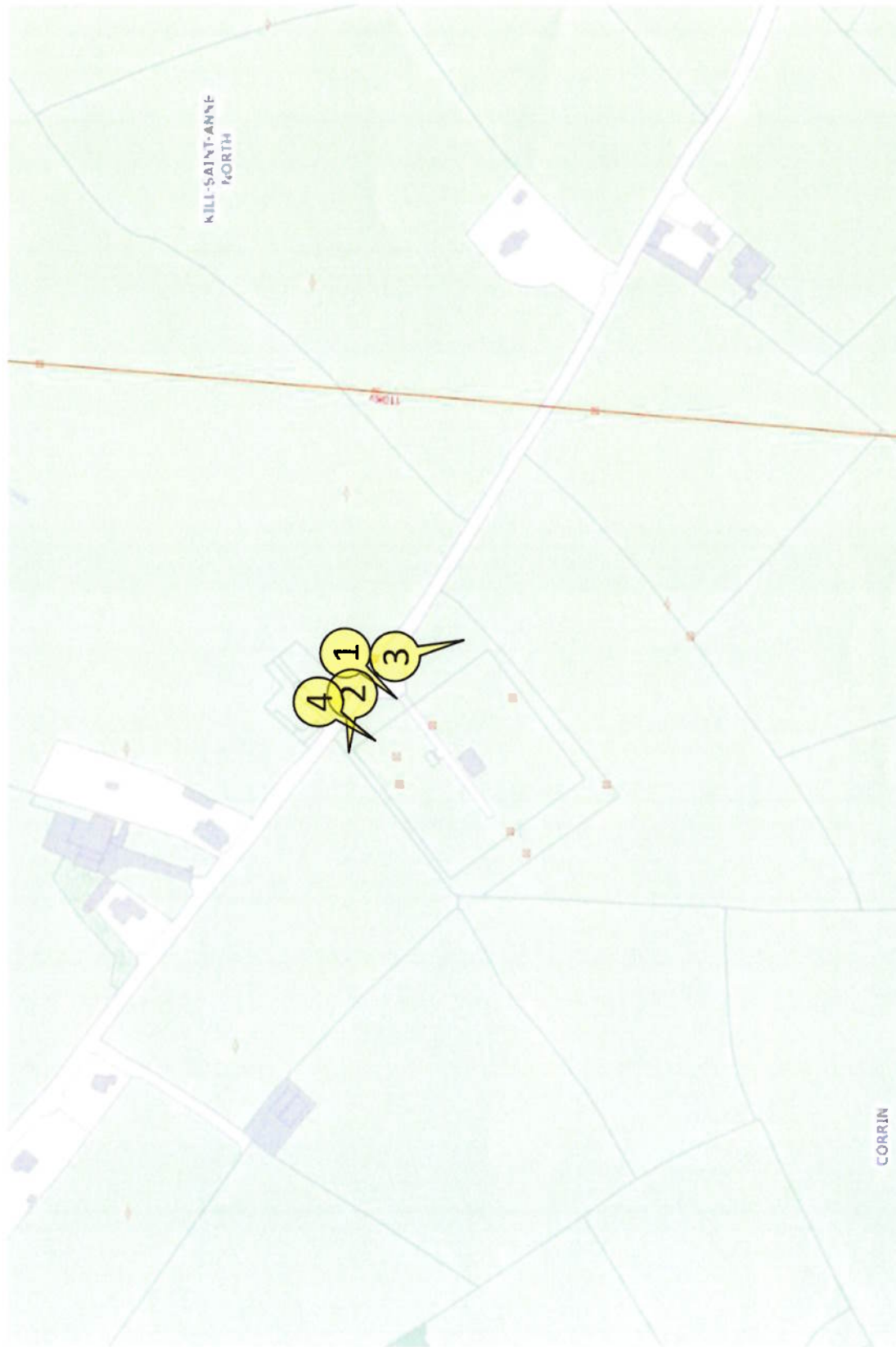


Photo 1 – Access to the substation form the public road



Photo 2 – Eastern part of site to the north of the access

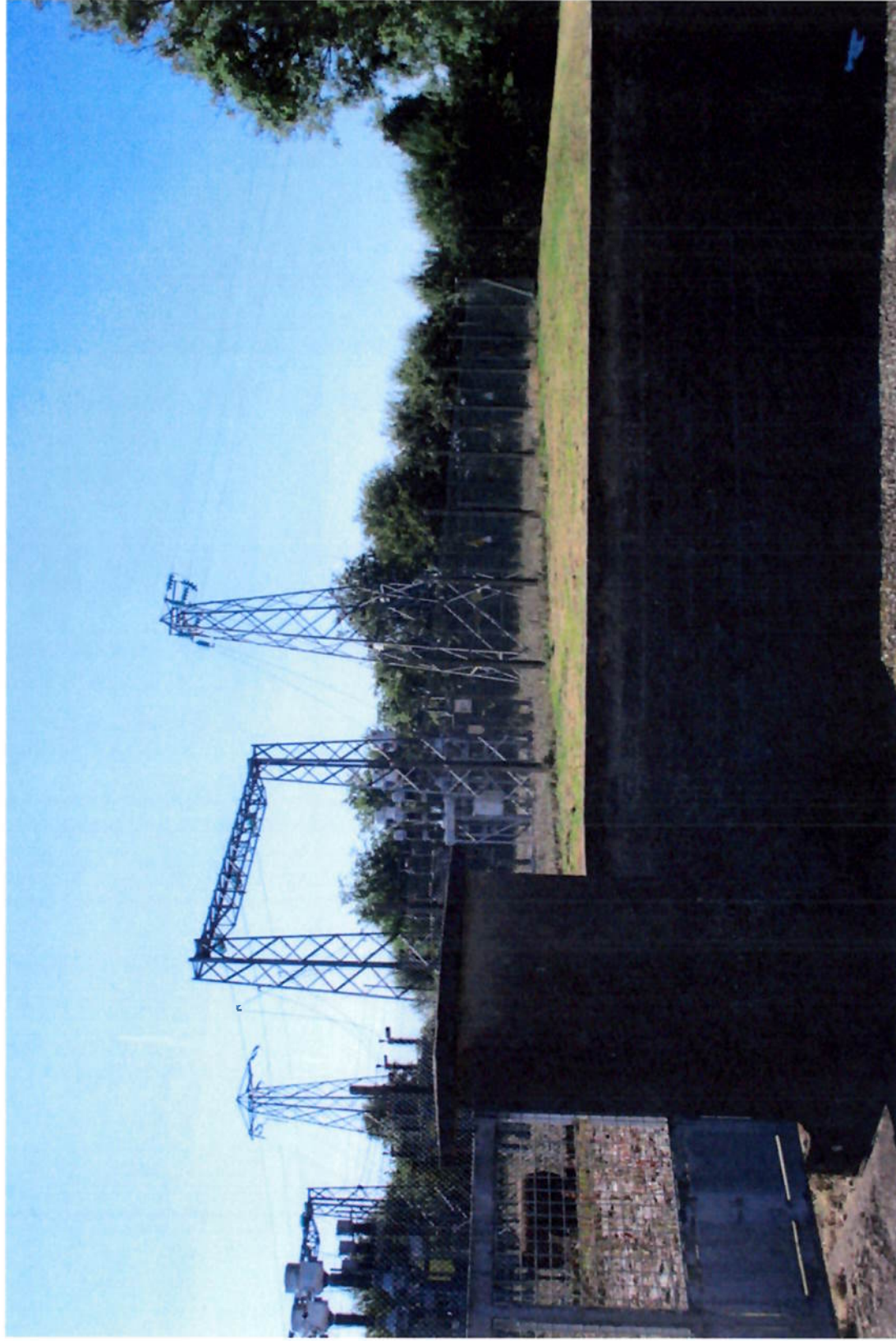


Photo 3 – Eastern part of site to the south of the access



Photo 4 – Existing electrical transmission infrastructure on the site

