

From: [Máire McNamee](#)
To: [SIDS](#)
Subject: ACP-323201-25 – Request for Formal Closure of Section 182E Pre-Application Consultation
Date: Friday 3 July 2026 13:48:24
Attachments: [image001.png](#)
[ACP Pre-App Cover Letter 03.07.2026.pdf](#)
[ACP Pre-App Location Plan 03.07.2026.pdf](#)
[ACP Pre-App Indicative Layout Plan 03.07.2026.pdf](#)

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Dear Sir/Madam,

Please find attached our request for formal closure of the Section 182E pre-application consultation in respect of ACP-323201-25 and for the Commission to issue its determination as to whether the proposed development constitutes development within the scope of Section 182A of the Planning and Development Act 2000 (as amended).

The attached submission includes the covering letter together with the updated site location plan and indicative site layout plan referred to therein.

Should you require any further information or clarification, please do not hesitate to contact me.

Kind regards,
Máire



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BELFAST | DUBLIN | LONDON | EDINBURGH

03 July 2026

The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Via email: sids@pleanala.ie

Dear Sir/Madam,

RE: ACP-323201-25
Section 182E Pre-Application Consultation – Request for Formal Closure and Determination
Proposed 220kV Substation and Battery Energy Storage System (BESS), East Limerick, Co.
Limerick

We act on behalf of Harmony Solar East Limerick Limited¹, the prospective applicant in respect of the above-referenced Section 182E pre-application consultation.

Further to the pre-application consultation meeting held on 14th October 2025, we now wish to formally request closure of the pre-application consultation process and to invite the Commission to issue its determination as to whether the proposed development constitutes development within the scope of Section 182A of the Planning and Development Act 2000 (as amended).

As noted in the Record of Meeting, the Commission advised that it would be in a position to issue a determination once the preferred development option had been confirmed and the consultation formally closed. Since that time, the project design has progressed and the proposed grid infrastructure has been refined. In particular, it has now been confirmed that the future transmission infrastructure at East Limerick will comprise a proposed 220kV substation and associated infrastructure, including a Battery Energy Storage System (BESS), together with all ancillary works required to facilitate connection to the national grid.

Accordingly, the determination request now relates to the proposed substation development and associated infrastructure, including BESS. In accordance with the matters noted by the Commission

¹ Harmony Solar East Limerick Limited, Ballyseskin House, Kilmore, Co. Wexford

during the pre-application consultation process, and for the purposes of assisting the Commission in making its determination, we enclose updated drawings illustrating the proposed substation and BESS development as now intended to be brought forward. Specifically, we enclose:

- site location plan for the proposed substation/BESS lands; and
- an updated site layout plan for the proposed substation and BESS development.

We note that the Commission has previously determined co-located substation and BESS development to constitute transmission infrastructure within the scope of Section 182A, including in the context of stand-alone BESS development and also where associated with renewable energy generation projects. In this case, the proposed substation development, including the BESS and associated infrastructure, will form a significant node on the 220kV transmission network and is fundamentally concerned with the transmission of electricity. Having regard to the nature and function of the proposed infrastructure, and the broader interpretation of Section 182A reflected in recent Commission determinations, we consider that the proposed development clearly constitutes development for the purposes of electricity transmission.

The proposed development remains functionally linked to the wider East Limerick Solar Farm project. The solar farm itself is being progressed separately by way of planning application to Limerick City and County Council, albeit the cumulative and functional relationship between the two elements of the overall project has been and will continue to be clearly addressed within the relevant planning and environmental documentation.

We consider that the information now before the Commission is sufficient to allow it to reach a conclusion on the status of the proposed development under Section 182A, having regard to the nature and function of the infrastructure proposed, the matters previously outlined in the submitted documentation and presentation material, and the discussions held with the Commission at the pre-application consultation meeting.

Should the Commission require any clarification in order to finalise its determination, we would be pleased to respond.

Yours faithfully,



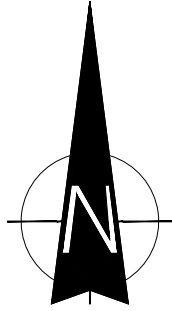
Máire McNamee

Gravis Planning

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ISO A1 594mm x 841mm

Project Management Initials: Designer: BG Checked: JF Approved: ER



Map Series:
Prime Data Vector

ITM Centre Point Co-ordinate:
X,Y = 570308.16, 634520.90

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PROJECT

East Limerick Solar Farm

CLIENT



CONSULTANTS



NOTES: -

- This drawing is to be read in conjunction with relevant engineering drawings, specifications and reports.
- Dimensions are in meters, & coordinate system is ITM, unless noted otherwise.
- Drawings are not to be scaled use figured dimensions only.

LEGEND: -

OHL Conductor to be removed	---
Existing 220kV OHL Conductor	---
Proposed Access Track	---
Proposed Temporary Track Widening	---
Proposed 220 kV GIS Substation Compound	---
Proposed 220 kV New Infrastructure	---
Proposed 220 kV Structure	---
Additional Land Owned/Controlled by Applicant	---
Site Boundary	---
BESS area - 9,690 m ²	---
Drain to be diverted	---
Drain to be removed	---
Contour lines	---

ISSUE/REVISION

NO	26.26.2026	Issued for Information
I/R	DATE	DESCRIPTION

PROJECT NUMBER

300-101309

SHEET TITLE

Site Location Map
BESS Area

SHEET NUMBER

300101309-O-DR-300

Site Location Plan
Scale: 1:1000

1:1000
20m 0 20m 40m 60m 80m 100m

PROGRESS PRINT
NOT FOR CONSTRUCTION

Strictly a High Level Design.
Swept Path Analysis to be
determined in later Design

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SCALE: 1:2500 @ A1

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- DENOTES SITE BOUNDARY

Client: HARMONY SOLAR EAST LIMERICK LTD.									
Project: EAST LIMERICK SUBSTATION DEVELOPMENT, HOSPITAL, CO. LIMERICK									
Drawing Title: SITE LOCATION MAP									
Project	Originator	Phase	Element	Spatial Zone	Level	Type	Role	Number	
25/01/14	MPA -	X -	X -	X -	XXX -	DR -	CE -	0011	
Date/Issued	Checked	Date	Scale	Purpose				Revision	
CB	MJP	30/04/25	1:2500	P3-PLANNING				00	

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