

East Limerick Solar Farm

**Proposed 220kV Substation & Loop-
In/Loop-Out Connection**

**Pre-Application Consultation Request
to
An Coimisiún Pleanála**

Planning Statement

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1.0 Introduction

- 1.1 This Statement is submitted to An Coimisiún Pleanála (referred to as 'the Commission' hereafter) by Gravis Planning¹ on behalf of Harmony Solar East Limerick Limited², who intend to apply for planning permission to the Commission under Section 182 of the Planning and Development Act, 2000 (as amended)³, for a new 220 kV substation and 'loop-in/loop-out'⁴ grid connection to serve a proposed solar farm development on lands to the west and south of Hospital village and north-west of Knocklong village in east County Limerick.
- 1.2 The proposed substation and grid connection infrastructure, in forming a new node on the 220kV transmission network, will in our view constitute 'Strategic Infrastructure' within the scope of Section 182A of the Act. We would welcome confirmation of the Commission's opinion on this matter.
- 1.3 Planning policy at national, regional and local level supports development of the type proposed, subject to standard planning and environmental considerations. This Statement does not set out a planning policy assessment. Rather, it is intended to assist the Commission's consideration of whether the connection infrastructure that is required for the project constitutes 'Strategic Infrastructure', by providing an overview of the proposed development and relevant statutory provisions. It is set out as follows:
- Introduction
 - Site of Proposed Development
 - Overview of Proposed Development
 - Environmental Impact
 - Opinion on Status under Section 182A
- 1.4 The project has been subject to a comprehensive feasibility appraisal, including constraints mapping, initial environmental, ecological and archaeological assessments, flooding and access considerations. Information from this exercise is summarised in brief within this statement.

Public Consultation

- 1.5 Given the scale and nature of the proposed solar farm, Harmony Solar East Limerick Limited is committed to undertaking public consultation to understand the views of local residents and businesses in advance of finalizing the project design. Early public consultation on the project has been undertaken accordingly. A leaflet was posted to local residents and businesses within a 500m catchment area of the site and a newspaper notice was issued in the Limerick Leader. These set out information about the proposed solar farm, provided a link to the project website to access more information, and invited feedback on the proposed development. The feedback

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² Harmony Solar East Limerick Ltd., Ballyseskin House, Kilmore, Co. Wexford

³ Referred to hereafter as 'the Act'

⁴ 'LILO'

received has been considered and responded to, and amendments will be made to the solar farm design where feasible to address any concerns.

- 1.6 The project website can be accessed here: www.eastlimericksolarfarm.ie

Planning and Development Act 2024

- 1.7 The Planning and Development Act 2024 introduces a provision under Chapter 4 (*Planning Applications Directly to Commission*), Section 115 (2), that '*where this chapter applies to part only of a development, an application for permission for the entire development shall be made to the Commission under this Chapter*'. This includes Strategic Infrastructure Development as set out in Chapter 1, Section 82 (1)(b)(i).
- 1.8 Given the anticipated introduction of accompanying Regulations later this year, and as the planning application for the solar farm is intended for submission in early 2026, it is assumed at this stage that one application for the entire project⁵ will be submitted to the Commission for determination. In advance of that however, we request confirmation that the proposed substation and loop-in/loop-out connection constitutes 'Strategic Infrastructure' within the scope of Section 182A of the Act.

⁵ Solar farm, substation and LILO connection.

2.0 Site of Proposed Development

2.1 Site Location

- 2.1.1 The site of the overall project is spread across c. 210ha. over 8 land parcels in East County Limerick. The land parcels are located to the west and south of Hospital village and north-west of Knocklong village. All of the land parcels can be accessed from the local road network⁶.
- 2.1.2 There are currently two proposed sites for the 220kV substation and grid connection.
- 2.1.3 Site Option 1 is the central parcel which is located along the L1509 Ballycahill Road. It is located to the north of the local road. The parcel is traversed by the existing 220kV overhead line and measures 8.9ha. The location of the proposed substation is indicated on the submitted Site Location Plan Sheet 4 of 7. The proposed connection infrastructure will be linked to the solar farm by way of underground cable. This is likely to be via a mixture of public roads and private land.
- 2.1.4 The substation site Option 1 is in reasonable proximity to residential properties to the south east (c. 215m). In addition, geophysical survey work carried out has identified potential archaeology within the land parcel. As such, pending the completion of noise survey work and targeted test trenching, a second option for the substation and LILO connection is also being considered.
- 2.1.5 Site Option 2 is the southernmost parcel within the project area. The proposed location is indicated on the submitted Site Location Plan Sheet 7 of 7. The parcel comprises c. 22.7ha. The existing 220kV overhead line runs to the east of the indicative substation location. The substation would be connected to the 220kV overhead line either through underground cabling or overhead lines. The proposed connection infrastructure will be linked to the solar farm by way of underground cabling.

2.2 Site Description

- 2.2.1 The project lands are in a rural, agricultural area, and are of generally flat topography. All are in agricultural use at present.
- 2.2.2 They lie entirely within landscape designated as 'Agricultural Lowlands' Landscape Character Area (LCA) within the Limerick Development Plan 2022-2028. There is no sensitivity scale relating to the Agricultural Lowlands catchment; instead, the Limerick Development Plan outlines that under Policy EH P8 the Council will:

“where necessary safeguard the sensitivity of Limerick’s landscape types, through the landscape characterisation process in accordance with the Draft Guidelines for Landscape and Landscape Assessment (2000)”.

⁶ See submitted overall site location plan

- 2.2.3 The Agricultural Lowlands are described under 'LCA 01 – Agricultural Lowlands' as follows:

“this is the largest of the Landscape Character Areas in Limerick and comprises almost the entire central plain. This landscape is a farming landscape and is defined by a series of regular field boundaries, often allowed to grow to maturity. This well-developed hedgerow system is one of its main characteristics. In terms of topography, the landscape is generally rather flat with some locally prominent hills and ridges. The pastoral nature of the landscape is reinforced by the presence of farmyards.

- 2.2.4 There are no residential dwellings within the overall red line boundary. There are, however, residential properties and farm holdings throughout the surrounding area. Hospital village is located within the northern area of the land parcels and Knocklong is located to the south.
- 2.2.5 There are a number of archaeological sites recorded across the full extent of the lands and potential archaeology has also been identified through the geophysical survey carried out. Archaeology is recorded on the Option 2 site. Potential archaeology has been identified on Option 1 site. This is being taken into consideration within the layout and design of the substation at both locations. Appropriate exclusion zones will also be incorporated into the solar farm design. Site specific, targeted test trenching will be carried out in advance of a planning application submission as required.
- 2.2.6 There are some mapped watercourses and non-mapped watercourses along the field boundaries and appropriate buffers will be applied at these locations. Small portions of the site are covered by the NIFM 1% and NIFM 0.1% predictive flood mapping extents - solar panels will not be constructed here and a 5m buffer to account for uncertainty in the indicative flood extents will be applied. The siting of the substation within the potential substation sites will take into consideration NIFM flood probability and the identified watercourses to ensure that it does not increase the risk of flooding on site or elsewhere.
- 2.2.7 The lands have been subject to initial ecological assessment, including a full site walkover. No significant ecological constraints which cannot be mitigated in the project design were identified. As further surveys are carried out, these will be considered as the design of the solar farm and substation progresses.
- 2.2.8 To summarise, while there are some identified constraints across the project lands, these will be accounted for during the solar farm design process. Any constraints identified on the potential substation sites will be considered within the design process to appropriately limit or, if possible, eliminate any impact.

2.3 Site Ownership

- 2.3.1 The land for the solar project is in multiple ownerships, with agreements in place between the various landowners and the prospective applicant to prepare and submit the planning application.
- 2.3.2 The land for substation site Option 1 is in two ownerships and the land for Option 2 is in three ownerships. Agreements are in place or are at the latter stages of negotiations with these landowners for a potential substation and LILLO connection to be located on the lands.

2.4 Planning History

- 2.4.1 There is no notable planning history within the overall project area. There is one approval for a dwelling on the most northern parcel, however this has not been implemented and the permission has expired. There is also a refusal for a dwelling dating back to 1997⁷. Neither case has any impact on the suitability of the lands for solar development or for the development of the preferred or alternative substation sites.
- 2.4.2 There is no planning history recorded on the two sites under consideration for the substation.
- 2.4.3 Planning history in the wider area mainly relates to agricultural and one-off residential proposals.

⁷ Limerick County and City Co. Planning Reg. Ref. 11251& 962029

3.0 Overview of Proposed Development

3.1 Overall Project

- 3.1.1 Based on the feasibility and design work undertaken to date it is anticipated that the developable area of the project lands will be c. 210 ha.

3.2 220 kV Substation & LILO connection

- 3.2.1 The proposed substation options are still being designed based on the constraints that have been identified. The proposed substation and LILO connection will, however, include the following elements:

- EirGrid Control Building;
- Independent Power Producer Control Building;
- 220kV transformer;
- Internal site access routes;
- Masts and underground cabling;
- Other associated electrical infrastructure;
- Security and safety fencing; and
- Associated site works and drainage.

Substation and Compound

- 3.2.2 The substation will comprise two separate compounds, an Eirgrid compound and a customer compound. The compounds will be made up of various electrical equipment surrounded by a gravelled area and with an exterior palisade fence.

End Masts

- 3.2.3 The end masts will be located on the existing 220kV transmission line in order to loop the proposed substation into the electricity transmission system. However, at this stage it has not been confirmed whether these will be connected via an underground cable or overhead lines.

Underground Cabling

- 3.2.4 The substation and LILO connection will be linked to the solar farm by way of underground cabling routed through private lands and along the public road. The underground cabling route is still being designed and therefore the exact route has not yet been confirmed.

4.0 Environmental Impact

- 4.1 Solar farms, regardless of generation capacity, are not identified as a form of development requiring mandatory Environmental Impact Assessment (EIA) and, based on all assessments undertaken to date, the project will not require 'sub-threshold' EIA.
- 4.2 A formal EIA screening opinion will be prepared in due course, however at this stage it is anticipated that the project application will be accompanied by a comprehensive Planning and Environmental Considerations Report, including:
- Project Need and Policy
 - Water Quality, Hydrology and Flood Risk Analysis
 - Ecology and Biodiversity Assessment
 - Noise
 - Human Health and Amenity
 - Landscape and Visual Impact Assessment
 - Glint and Glare Assessment
 - Archaeology and Cultural Heritage
 - Traffic and Transport
- 4.3 The planning application to be submitted to the Commission will consider the impact of the whole project, i.e. the solar farm, substation and the grid connection.
- 4.4 The nearest Natura 2000 site is Glen Bog SAC, which is 3.6km from the site. The Lower River Shannon SAC is also hydrologically connected at a distance of approximately 42km, via the River Maigue. Accordingly an Appropriate Assessment Screening assessment will be carried out which will determine whether effects on Natura 2000 sites are likely. If so, a Stage 2 Natura Impact Statement will be prepared.

5.0 Opinion on Status under Section 182A

5.1 Legislative Provisions

5.1.1 Under S182A of the Act where a person (or ‘undertaker’) intends to carry out development “comprising or for the purposes of electricity transmission” an application for same must be made directly to An Bord Pleanála⁸ (under Section 182B of the Act).

5.1.2 Subsection 9 of S182A states that, in this regard, ‘transmission’ 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”

5.1.3 In section 2(1) of the Electricity Regulation Act, 1999, “transmission” is defined as 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 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.

5.1.3 “Distribution” is defined as “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 switch gear and which is used for conveying electricity to final customers”.

5.1.4 “Electric plant” is defined as: “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

⁸ Now ‘An Coimisiún Pleanála’

5.2 Precedent Decisions

5.2.1 The Commission has previously confirmed ‘Loop-In/Loop-Out’ 220 kV substations being proposed in conjunction with solar development to constitute ‘*electricity transmission*’ development within the meaning of S182A.

5.2.2 Examples of precedent assessments regarding 220kV substations include the following case references:

- 320154⁹
- 322217
- 318119
- 303412

5.3 Assessment and Conclusion

5.3.1 In the circumstances of this case, with the substation being situated in either location detailed in Section 2 above, it is considered that:

- The proposed substation constitutes ‘electric plant’.
- The proposed substation and ‘Loop-In/Loop-Out’ connection will form part of the transmission system when in operation
- The proposed development will constitute a new ‘node’ on the 220 kV transmission network.
- The proposed development will, accordingly, constitute ‘*electricity transmission*’ development within the meaning of S182A of the Act.

5.3.2 We conclude that the proposed development constitutes ‘strategic infrastructure’ within the scope of S182A of the Act and that an application should be made directly to An Coimisiún Pleanála in accordance with S182B of the Act.

5.3.3 As set out in Section 1 above, the Planning and Development Act 2024 introduces a provision under Chapter 4, Section 115 (2), that ‘*where this chapter applies to part only of a development, an application for permission for the entire development shall be made to the Commission under this Chapter*’. This includes Strategic Infrastructure Development as set out in Chapter 1, Section 82 (1)(b)(i).

5.3.4 Accordingly, we assume at this stage that one application for the entire development¹⁰ will be submitted to the Commission in due course.

⁹ This relates specifically to a solar farm development.

¹⁰ For the solar farm, substation and LILO connection.