



An
Coimisiún
Pleanála

Inspector's Report

ACP-323201-25

Development

Proposed 220kV substation and associated grid connection.

Location

Lands to the west and south of Hospital and north-west of Knocklong, County Limerick.

Planning Authority

Limerick County Council

Type of Application

Pre-Application consultation under Section 182E of the Planning and Development Act 2000, as amended.

Prospective Applicant

Harmony Solar East Limerick Ltd

Inspector

Barry O'Donnell

1.0 Introduction

- 1.1. The Commission received a request on 25th July 2025 from the Prospective Applicant, Harmony Solar East Limerick Ltd, 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 220kV substation and associated loop in/loop out connection to existing 220kV overhead powerlines on lands to the west and south of Hospital and north-west of Knocklong, County Limerick. A further submission dated 3rd July 2026, submitted in tandem with the request to close the pre-application consultation, advised that the project has been amended in order to incorporate a BESS.
- 1.2. One pre-application consultation meeting was held with the Prospective Applicant on 14th October 2025. A record of the meeting is on file. Following the meeting, an email requesting closure of the consultation process was received on 3RD July 2026.
- 1.3. The primary purpose of the pre-application consultation is to address the issue of whether or not the proposed development constitutes Strategic Infrastructure Development (SID) for the purposes of the 2000 Act.
- 1.4. This report provides an overview of the proposed development and a summary of the pre-application meeting, including advice provided by the Commission's representatives, and relevant legislative provisions. A list of recommended Prescribed Bodies that the application should be circulated to is provided at Appendix 1.

2.0 Site Location and Description

- 2.1. The Prospective Applicant's accompanying cover letter dated 25th July 2025 outlines that there are 2 No. site options for the proposed substation: -
 - Option 1 comprises of an agricultural plot that is to the south of Hospital and is accessed from the L1509. It is a relatively flat site, enclosed by a low-level hedge and at the time of my inspection was in use for livestock grazing.
 - Option 2 comprises of an agricultural plot that is north-west of Knocklong and which is accessed from a cul-de-sac and a farm track.

- 2.2. The further letter dated 3rd July 2026 includes a site location plan for the proposed development, identifying that the chosen site for the development is along the L1509 (the Option 1 site). I note from the site location drawing that identified application site red line boundary has increased in area from that shown on the original consultation drawings.

3.0 Proposed Development

- 3.1. The cover letter dated 25th July 2025 states that the proposed development comprises a 220kV substation and associated loop in/loop out connection to existing 220kV overhead powerlines. The letter states that the proposed substation design is still being developed and that it will include separate Eirgrid and Independent Power Producer compounds and control buildings, end masts, a 220kV transformer, underground or overhead cables, site access routes and associated infrastructure including additional electrical items.
- 3.2. The Commission will note that the further letter dated 3rd July 2026 states that the proposed development has changed since the time of the pre-application consultation meeting and that the transmission infrastructure will now 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 grid. The letter goes on to state that the development remains functionally linked to the wider East Limerick Solar Farm project.
- 3.3. The Commission will note that no details of the BESS facility have been provided, save for identification on drawing No. DR-300 that it occupies an area of 0.97ha at the north-eastern corner of the substation site.

4.0 Prospective Applicant's Case

- 4.1. The Prospective Applicant's case, as outlined in the cover letter dated 25th July 2025 submitted can be summarised as follows:
- The proposed substation constitutes 'electrical plant' and both the proposed substation and 'loop in loop out' connection will form part of the transmission network when in operation. The development will therefore constitute 'electricity

transmission' development, within the meaning of S182A of the Act, and will therefore constitute SID.

- Submission references a number of precedent decisions related to 220kV substations.

4.2. The further letter dated 3rd July 2026 discusses the changed project and can be summarised as follows: -

- The proposed development, including the BESS, will form a significant node on the 220kV transmission network and is fundamentally concerned with the transmission of electricity. The development constitutes development for the purposes of electricity transmission.
- The Commission has previously determined that co-located substation and BESS development constitute transmission infrastructure within the scope of Section 182A.

5.0 Relevant Planning History

5.1. I did not encounter any planning records pertaining to either of the option sites.

6.0 Relevant Precedents

6.1. There are a large number of pre-application directions pertaining to substation, BESS and grid connection infrastructure proposals that are of relevance to this pre-application proposal. These include: -

ABP Ref. No.	Location	Development Description	Decision Date	Decision
ACP-324122-26	Co. Mayo	BESS and associated grid connection	3/6/26	Is not SID
ACP-324001-26	Co. Offaly	BESS and associated grid connection	29/4/26	Is not SID
ACP-323974-25	Co. Cork	110/20kV substation and ancillary works	11/3/26	Is SID
ACP-323959-25	Co. Cork	110/38kV substation	11/3/26	Is SID
ACP-323874-25	Co. Galway	220kV substation and grid connection	3/2/26	Is SID

ACP-323789-25	Co. Dublin	110/38kV substation	2/10/25	Is SID
ACP-323627-25	Co. Tipperary	110kV GIS substation and grid connection	23/1/26	Is SID
ACP-323569-25	Co. Cork	110kV substation and grid connection	22/10/26	Is SID
ACP-323441-25	Co. Kilkenny	110kV GIS substation and grid connection	24/10/25	Is SID
ACP-323167-25	Co. Kerry	110kV AIS substation and grid connection	8/1/26	Is SID
ACP-322861-25	Co. Cork	110kV substation, BESS facility and associated grid connection	4/11/25	Is SID
ABP-322217-25	Co. Dublin	220/110kV GIS substation	11/6/25	Is SID
ABP-320154-24	Co. Cork	220kV AIS substation and associated 220kV grid connection	23/9/24	Is SID
ABP-319771-24	Co. Roscommon	BESS, 110kV substation and associated grid connection	5/9/24	110kV substation and 110kV underground cables are SID. BESS is not SID
ABP-319241-24	Co. Cork	BESS and associated grid connection	11/9/24	Is not SID
ABP-319155-24	Co. Cork	110kV substation and grid connection to adjacent 220kV substation	19/6/24	Is SID
ABP-318432-23	Co. Wexford	110kV substation and 110kV overhead loop-in cable	1/2/24	Is SID
ABP-318119-24	Co. Kerry	2 No. 220kV GIS substations and associated 220kV grid connection	15/5/24	Is SID
ABP-318011-23	Co. Wexford	BESS, 110kV substation and 110kV underground grid connection	18/12/23	110kV substation and 110kV underground cables are SID. BESS is not SID

7.0 Legislative Provisions

Planning and Development Act, 2000, as amended

- 7.1. 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)"

7.2. 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.

7.3. 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.”

7.4. 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.

Electricity Regulation Act 1999, as amended

7.5. 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".

8.0 Consultation Meeting

- 8.1. One pre-application consultation meeting was held with the Prospective Applicant on 14th October 2025. The meeting record relating to this development proposal and the presentation made by the applicant to the Commission's representatives are attached to the file.

9.0 Assessment

- 9.1. 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. The proposed development comprises a proposed 220kV substation and associated infrastructure, including a BESS, together with all ancillary works required to facilitate connection to the grid on lands to the west and south of Hospital and north-west of Knocklong, County Limerick. The Prospective Applicant states that the substation and grid connection will involve a 'loop in/loop out' connection to existing 220kV overhead lines and are intended to facilitate connection of a proposed solar farm to the National Grid.
- 9.3. The Prospective Applicant is seeking a determination from the Commission as to whether the proposed development is or is not SID and I note from the pre-application submission documents that they consider that it is SID.

9.4. Substation and Grid Connection

- 9.4.1. Under Section 182A of the Planning and Development Act, 2000 (as amended), an undertaker shall apply to the Commission for approval of a development comprising or for the purposes of energy transmission. Section 182A (9) sets a threshold of 110kV, in order for a high-voltage transmission line to be considered SID, for its purposes. The Act does not provide a threshold for a substation, however; the Commission will note that the subject proposal includes 220kV infrastructure, in terms of both the substation and the grid connection cables and the applicant also states that the proposal will be connected to the grid via loop in/loop out connection to existing 220kV overhead lines. I consider the proposed substation and grid connection fall within the definition of transmission, in accordance with Section 2(1) of the Electricity Regulation Act, 1999.
- 9.4.2. I have previously outlined at Section 6 of this Report a number of precedent pre-application cases in relation to electricity transmission infrastructure under S182E, where the Commission determined that the provision of both 220kV and 110kV substations and grid connections acting as a node on the transmission system constitutes SID. I consider these cases are directly related to the current proposal.
- 9.4.3. From the information available to me, I am of the opinion that the proposal constitutes SID.

9.5. BESS Facility

- 9.5.1. The Commission will note that the proposed BESS facility was not identified as part of the original submission, was not discussed at the pre-application consultation meeting and the applicant has only provided high-level information as part of the 3rd July 2026 submission.
- 9.5.2. A BESS is not a form of development listed in the Seventh Schedule of the 2000 Act. It can, however, be considered to constitute 'electrical plant', under the terms of the Electricity Regulation Act 1999, where it comprises plant connected with the generation, transmission, distribution or supply of electricity.
- 9.5.3. The Commission has made recent determinations in respect of BESS facilities that they (a) do constitute SID (ACP-322861-25) and (b) do not constitute SID (ACP-

324122-26 and ACP-324001-26). Key aspects of the determination in each of these 3 precedent cases was the existence or non-existence of an existing substation, for the proposed BESS to connect into. In the case of both ACP-324122-26 and ACP-324001-26 the BESS facilities did not require construction of a substation, whereas in the case of ACP-322861-25 the BESS required construction of a substation and grid connection and the Commission determined that the proposed substation, BESS and grid connection formed part of a single system that fell within the scope of S182A.

- 9.5.4. In this instance, the Prospective Applicant states that the BESS is functionally linked to the East Limerick Solar Farm project and, in this context, I note that the BESS will be a single purpose facility aimed at reinforcing and stabilising the grid and supporting decarbonisation. By reference to the Commission's determination on ACP-322861-25, the proposed BESS is dependent on the proposed 220kV substation and grid connection and that it cannot operate in isolation. I am satisfied that in the specific circumstances of this proposal, the 220kV substation, grid connection and BESS are a single system used for the conveyance of electricity and that this can be considered to comprise transmission because it is electric plant that is used for purposes connected with the generation, transmission and distribution of electricity at a transmission level. Accordingly, I am satisfied that the BESS, as part of the wider proposed development, falls within the scope of section 182A of the Planning and Development Act 2000, as amended.
- 9.5.5. As the BESS element of the project was not discussed at the pre-application consultation meeting, I recommend the Commission should attach a note to its determination directing that an application that includes a BESS facility should include a report that addresses the risk of fire, including the availability of a water supply and the containment of fire water.

9.6. Conclusion

- 9.6.1. In conclusion, therefore, I recommend that the Commission issue a determination that the proposed development consisting of a 220kV substation, BESS facility and associated grid connection falls within the scope of section 182A of the 2000 Act, as

amended, and that a planning application should be made directly to the Commission.

9.6.2. A list of prescribed bodies is set out in Appendix 1.

10.0 Recommendation

10.1. I recommend that the Prospective Applicant, Harmony Solar East Limerick Ltd, be informed that the proposed development of a 220kV substation, BESS facility and associated grid connection on lands to the west and south of Hospital and north-west of Knocklong, County Limerick, as set out in the plans and particulars received by An Bord Pleanála on 25th July 2025 falls within the scope of section 182A of the Planning and Development Act 2000, as amended, and that a planning application should therefore be made directly to the Commission.

10.2. I also recommend that Commission's determination should include the following note: -

- The Commission notes that the prospective applicant's letter dated 3rd July 2026 included advice that the proposed development now includes a Battery Energy Storage System. This was not referenced in the original documentation and was not discussed at the pre-application consultation meeting. Any future application that includes a BESS facility should include a report that addresses the risk of fire, including the availability of a water supply and the containment of fire water.

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.



Barry O'Donnell
Senior Planning Inspector

9th July 2026.

Appendix 1 – Prescribed Bodies

The following is a list of prescribed bodies considered by the Commission to be relevant to the proposed development: -

- Minister for Housing, Local Government and Heritage.
- Minister for Environment, Climate and Communications.
- Commission for Regulation of Utilities.
- Limerick County Council
- Uisce Eireann
- Office of Public Works
- Health Service Executive
- The Heritage Council
- An Taisce
- Inland Fisheries Ireland
- Health and Safety Authority

Further notifications should be made where deemed appropriate.