



Energy for
generations

Ballycummin 110 kV Substation Planning Report

Submission to: An Coimisiún Pleanála

Date: November 2025

Document No.: PE595-F0545-R545-003-000

Engineering and Major Projects, One Dublin Airport Central, Dublin Airport, Cloghran, Co. Dublin,
K67 XF72, Ireland.

Phone +353 (0)1 703 8000

www.esb.ie

Ballycummin 110 kV Substation - Planning Report

File Reference:	PE595-F0545	
Client Recipient:	/ ESB Networks	
Project Title:	Ballycummin 110 kV Substation	
Report Title:	Planning Report	
Report No.:	PE595-F0545-R545-003-000	
Revision No.:	000	
Prepared by:	Amy O'Connell	Date: 12/11/2025
Title:	Graduate Planner	
Verified by:	Heather McMeel	Date: 12.11/2025
Title:	Senior Planner	
Approved by:	Brendan Allen	Date: 12/11/2025
Title:	Planning and Environmental Group Leader	

Copyright © ESB

All rights reserved. No part of this work may be modified, reproduced or copied in any form or by any means - graphic, electronic or mechanical, including photocopying, recording, taping or used for any purpose other than its designated purpose, without the written permission of ESB.

Template Used: T-020-017-Engineering and Major Projects Report Template

Change History of Report

Date	New Revision	Author	Summary of Change

Executive Summary

This Planning Report has been prepared by ESB Engineering and Major Projects to accompany the Strategic Infrastructure Development (SID) application being made by the Electricity Supply Board (ESB) to An Coimisiún Pleanála (ACP). The site is in the Limerick City and County Council (LCCC) local authority area.

The project for which a planning permission is being sought is called the “Ballycummin 110 kV Substation”, where it is proposed to construct a new 110kV Gas Insulated Switchgear (GIS) substation on a site at Roches Avenue, Raheen Business Park in Limerick.

The proposed substation is required to reduce load stress on the existing Limerick 110 KV/ 38kV substation. With the current and predicted electricity load requirements in the area, a new 110 kV / MV substation needs to be constructed to cater for existing load and provide connections to customers in the business park.

This Planning Report and associated application documents have been prepared to ensure that appropriate planning requirements of the proposed development are considered.

This Planning Report has concluded the following:

- The characteristics of the proposed development are compatible with the stated objectives and policies of the Limerick Development Plan 2022-2028 and present no conflicts in terms of surrounding land uses.
- In terms of EU policy, national sectoral policy, national planning policy, regional planning policy, and local planning policy, the proposed development is considered to be compatible with all relevant policies and objectives.

Table of Contents

1	Introduction	5
2	The Planning Application	6
2.1	The Applicant	6
2.2	Site Location	6
2.3	Planning History	8
2.4	The Planning Application Process	8
3	The Proposed Development	12
3.1	Description of the Proposed Development	12
3.2	Project Rationale	13
3.3	Services	13
4	Environmental Assessment	14
4.1	Environmental Impact Assessment	14
4.2	AA Screening	14
5	Planning Policy Context	15
5.1	National Planning Policy	15
5.2	National Sectoral Policies	16
5.3	Regional Guidelines	16
5.4	Local Policies and Objectives	17
6	Planning Assessment	21
6.1	Compliance with National Energy Policy	21
6.2	Implementing National Planning Policy	21
6.3	Implementing Regional Spatial Economic Strategy	21
6.4	Implementing Limerick Development Plan Policies and Objectives	22
6.5	Planning Conclusion	23

Appendices

Appendix 1 – An Coimisiún Pleanála SID Screening Decision

Appendix 2 – List of Prescribed Bodies to be Notified

1 Introduction

This Planning Report (PR) has been prepared by ESB Engineering and Major Projects (EMP) to accompany this application being made directly to An Coimisiún Pleanála (ACP, “the Commission”) as ‘Strategic Infrastructure Development’ (SID) under the provisions of Section 182A of the Planning and Development Act 2000, as amended, and associated planning regulations.

The project for which planning permission is being sought is called the “Ballycummin 110 kV Substation” (hereafter referred to as the “Proposed Development”). The proposal is to construct a new 110kV Gas Insulated Switchgear (GIS) substation on a site in Raheen Business Park, Limerick. The proposed 110 kV/ 38kV/ MV substation will provide additional electricity network capacity both in the immediate and wider areas.

This PR has been prepared in support of this planning application to ensure that appropriate planning requirements are considered.

This report is structured as follows:

Section 1 – Introduction

Section 2 - The Planning Application

Section 3 - The Proposed Development

Section 4 – Environmental Assessment

Section 5 – Planning Policy Context

Section 6 – Planning and Environmental Conclusion

2 The Planning Application

2.1 The Applicant

Permission is being sought by the Electricity Supply Board (ESB). The registered address of the ESB is ESB Head Office, 27 Fitzwilliam Street Lower, Dublin 2, D02KT92, Ireland.

ESB was established in 1927 as a statutory body under the Electricity (Supply) Act, 1927. With a holding of 97.1%, ESB is majority owned by the Irish Government. The remaining 2.9% is held by the trustees of an Employee Share Ownership Plan.

As a strong, diversified utility, ESB operates across the electricity market, from generation through transmission and distribution, to supply of customers, in addition to using our networks to carry fibre for telecommunications. ESB is the leading Irish utility with a regulated asset base of approximately €14 billion (comprising ESB Networks €11 billion and NIE Networks €3 billion), a 25% share of generation in the all-island market, and retail businesses supplying electricity and gas to almost 1.9 million customer accounts throughout the island of Ireland and Great Britain. During the year ended 31 December 2024, ESB Group employed an average of almost 9,600 people (ESB 2024 Annual Report and Financial Statements).

ESB's mission is to bring sustainable and competitively priced energy solutions to its customers and its vision is to be Ireland's foremost energy company competing successfully in the all-island market. ESB are committed to empowering the sustainable energy transition, by undertaking transformational changes across the business to achieve net zero emissions by 2040: developing and connecting renewables, building resilient infrastructure, and enabling and supporting customers to live more sustainably using clean electricity.

2.2 Site Location

The proposed development involves the installation of a new 110 kV/38kV MV station on Roches Avenue, Raheen Business Park. The site is greenfield and the existing Limerick – Moneteen 110 kV overhead line traverses the site. The substation site is bordered to the North by Stryker Orthopaedics and to the South by the Eli Lilly Campus which is currently under construction. The proposed substation compound would be accessed from Roches Avenue. See figure 2-1 Site Location Map.

The planning application boundary encompasses an area of 5.45 ha. The surrounding area has a mix of land uses including primarily industrial and commercial with some educational and residential buildings in the vicinity.

Ballycummin 110 kV Substation - Planning Report

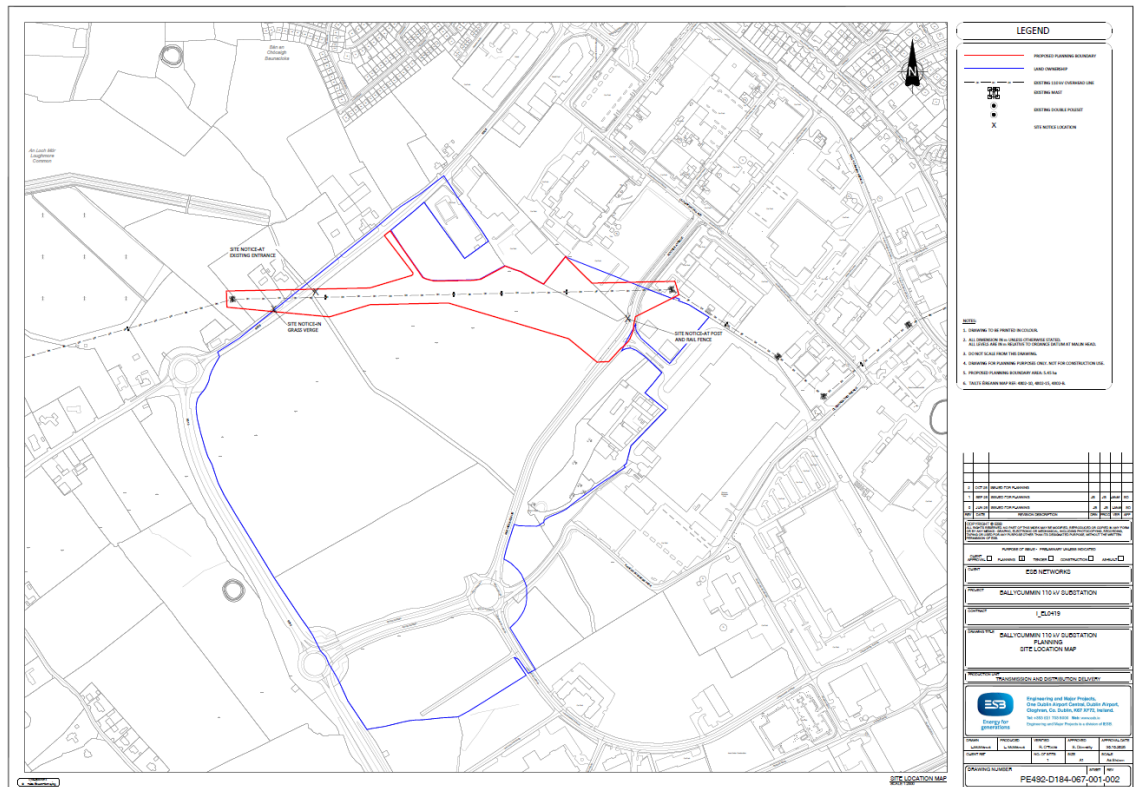


Figure 2-1 Site Location Map



Figure 2-2 Aerial View of Site Location

2.3 Planning History

This site was subject to a planning application for a 110 kV/ MV station in 2008 which was granted in February 2009 under planning ref. LCCC 08/1236 but never progressed into construction. In the surrounding lands, several planning applications have been made in respect of Raheen Business Park in recent years. This reflects the expansion of the industrial estate. Eli Lilly was granted permission in 2025 to expand their large Biopharmaceutical Manufacturing Campus (LCCC planning ref. 22190).

The planning history for the site and its surrounding areas demonstrates the need for improved electricity infrastructure to enable the high level of development taking place in the Business Park and in the wider area, including proposed residential developments. Surrounding businesses in the Park include Eli Lilly, Analog Devices, Stryker and Regeneron amongst many others. No conflict with existing land uses is foreseen.

2.4 The Planning Application Process

2.4.1 Pre-Planning Consultations with ABP (SID Screening)

The Strategic Infrastructure Development (SID) provisions of the PDA 2000, as amended, and in particular section 182A have been considered during the preparation of this application.

Under ACP Reference 321687-25, the Commission decided that the proposed development does come within the scope of section 182A of the Planning and Development Act, 2000, as amended and is a Strategic Infrastructure Development – See Appendix 1. Accordingly, an application for planning consent for the proposed development is being made directly to An Coimisiún Pleanála.

2.4.2 Statutory Consultation and Public Notices

In accordance with the requirements for public notices set out under the PDA 2000, ESB has notified the public of this application by means of the following:

- Site notices – three site notices have been erected on the relevant lands on the 12/11/2025. The location of the notices are shown on the submitted planning application drawings. A copy of the notice is included in the application pack.
- Newspaper notices – A notice has been published in the Irish Examiner dated 13/11/2025 and the Limerick Post dated 15/11/2025. Copies of both newspaper notices are included in the application pack.
- Prescribed Bodies – This application has been circulated to prescribed bodies as advised by ACP following the SID Screening Determination – See Appendix 2.
- The project website can be found at the following address; www.ballycummin110kvsubstation.ie.

2.4.3 Drawings

This application has been prepared in accordance with the requirements set out under the PDA 2000 and its associated regulations, as amended. The list of drawings prepared in support of this planning application is tabulated below.

Table 2-1 Drawings submitted in support of planning application.

Drawing No.	Drawing Title	
PE492-184-067-001-002	Ballycummin 110 kV Substation	Site location Map
PE492-184-067-002-001	Ballycummin 110 kV Substation	Overall Layout
PE492-184-067-003-000	Ballycummin 110 kV Substation	Existing Layout Sheet 1
PE492-184-067-004-000	Ballycummin 110 kV Substation	Existing Layout Sheet 2
PE492-184-067-005-000	Ballycummin 110 kV Substation	Existing Layout Sheet 3
PE492-184-067-006-000	Ballycummin 110 kV Substation	Existing Layout Sheet 4
PE492-184-067-007-000	Ballycummin 110 kV Substation	Site Clearance Sheet 1
PE492-184-067-008-000	Ballycummin 110 kV Substation	Site Clearance Sheet 2
PE492-184-067-009-000	Ballycummin 110 kV Substation	Site Clearance Sheet 3
PE492-184-067-010-000	Ballycummin 110 kV Substation	Site Clearance Sheet 4
PE492-184-067-011-000	Ballycummin 110 kV Substation	Proposed Site Layout Sheet 1
PE492-184-067-012-000	Ballycummin 110 kV Substation	Proposed Site Layout Sheet 2
PE492-184-067-013-002	Ballycummin 110 kV Substation	Proposed Site Layout Sheet 3
PE492-184-067-014-001	Ballycummin 110 kV Substation	Proposed Site Layout Sheet 4
PE492-184-067-015-001	Ballycummin 110 kV Substation	Proposed Sections
PE492-184-067-016-001	Ballycummin 110 kV Substation	Proposed Elevations
PE492-184-067-017-001	Ballycummin 110 kV Substation	Proposed Drainage Layout
PE492-184-067-018-000	Ballycummin 110 kV Substation	Watermain Layout
PE492-184-067-019-000	Ballycummin 110 kV Substation	Road entrance and Sightlines
PE492-184-067-020-000	Ballycummin 110 kV Substation	Site location Map(1:1000)
PG406-D100-087-005-000	General Drawings and Notes	110 kV GIS Building
PG406-D100-087-006-000	General Drawings and Notes	110 kV GIS Building

PG406-D100-087-007-000	General Drawings and Notes	38 kV GIS Building
PG406-D100-087-008-000	General Drawings and Notes	38 kV GIS Building
PG406-D100-088-001-000	General Drawings and Notes	110 kV Transformer bund
PG406-D100-088-002-000	General Drawings and Notes	38 kV Transformer Bund
PG406-D100-088-003-000	General Drawings and Notes	Arc suppression Coil Bund Details
PG406-D100-088-004-000	General Drawings and Notes	Interface Transformer bund details
PG406-D100-088-005-000	General Drawings and Notes	Typical House Transformer
PG406-D100-088-006-000	General Drawings and Notes	Typical NES Details
PG406-D100-088-007-000	General Drawings and Notes	Typical NER Details
PG406-D100-088-008-000	General Drawings and Notes	Typical Lightning Monopole Details
PG406-D100-088-010-000	General Drawings and Notes	Typical Road and Compound Details
PG406-D100-088-011-000	General Drawings and Notes	Typical Drainage details
PG406-D100-088-012-000	General Drawings and Notes	Typical Lighting Details
PG406-D100-003-001-003	General Drawings and Notes	Palisade Gate
PG406-D100-002-001-002	General Drawings and Notes	Palisade Fence
PG406-D100-009-001-002	General Drawings and Notes	Concrete Post and Rail Fence
PE424-D7001-001-002-007	Trench Cross Section	
PG567-D004-477-002-004	110 kV Tower	
PG567-D004-516-001-004	110 kV Tower LCIM	
PG567-D004-483-001-002	Wood Pole Set	

2.4.4 Statement of Legal Interest in the Lands

ESB has a pre-existing leasehold on area of 0.46 Ha within the Raheen Business Park, which is traversed by the Limerick-Moneteen 110 kV Transmission Line. This site was subject to a planning application for a 110 kV/ MV station in 2008 which was granted in February 2009 under planning ref. 08/1236 but never progressed into construction. In order to build a larger 110 kV/ 38 kV /MV substation, an additional 1.21 Ha. was necessary and the leasehold for said lands is currently being acquired from Eli Lily and the IDA.

Letters of consent from the landowners IDA and Eli Lilly accompany this planning application.

3 The Proposed Development

3.1 Description of the Proposed Development

The proposed electrical substation is described in the public notices as follows;

In accordance with Section 182A of the Planning and Development Act 2000, as amended (the 'PDA 2000'), the Electricity Supply Board (ESB) gives notice of its intention to make an application for approval to An Coimisiún Pleanála in relation to the proposed development of a c. 5.45 ha site on the Roches Avenue, Raheen Business Park, Limerick, County Limerick, described below.

The Proposed Development will consist of the construction of a new 110/38kV/MV electrical substation and will include the following elements:

1. Removal of four existing 110 kV Overhead Line timber pole sets (c. 15 m in height) and c. 800 m of Overhead Line conductor;
2. Relocation of existing Interface Transformer;
3. Construction of:
 - i. A new substation compound (c. 5,950 sq. m.) with a 2.6 m high palisade fencing;
 - ii. A new 110 kV GIS building with eight 110 kV bays (c. 700 sq.m.; c. 12 m in height);
 - iii. A new 38 / 20 kV GIS building with fourteen 38 kV bays and eighteen MV (20 kV) bays (c. 235 sq.m.; c. 7 m in height);
 - iv. Two bundled 110 / 38 kV power transformers (c. 5 m in height) with associated electrical equipment;
 - v. Two bundled 38 / 20 kV power transformers (c. 5 m in height) with associated electrical equipment;
 - vi. Three bundled Arc Suppression Coils (c. 4 m in height) with associated electrical equipment;
 - vii. Two new 110 kV double circuit overhead (OHL) line / cable interface end masts (c. 17m in height);
 - viii. One new 110 kV double circuit overhead line (OHL) angle mast (c. 17 m in height);
 - ix. One temporary 110 kV Overhead Line timber pole set (c. 16 m in height);
 - x. Temporary diversion of the existing 110 kV overhead line to the temporary timber pole set (c. 320 m of OHL conductor);
 - xi. Diversion of the existing 110 kV overhead line to the new end masts (c. 510 m of OHL conductor);
 - xii. 110 kV underground cabling between the 110 kV GIS building and the new line / cable interface end masts;
 - xiii. Associated and ancillary outdoor electrical equipment and other apparatus, including installation of underground cables and ducts;
4. Site development works including provision of access roads, car parking area, lighting, telecommunications, fencing, landscaping, site services including drainage and all other ancillary works.

3.2 Project Rationale

Every five years, ESB Networks submits a business plan to the Commission for the Regulation of Utilities (CRU), outlining our planned investments in the network over the next five years as part of a regulated Price Review (PR) process. ESB has recently issued PR6 which covers the period from 2026-2030.

PR6 highlights that *“the electricity network must be capable of meeting both peak demand and larger flows of electricity. We anticipate an increase in connection applications of all sizes, as well as higher levels of network utilisation by existing customers. This will require investment in additional network capacity at all voltage levels (high, medium and low voltage), as well as measures to increase the reliability and resilience of the existing network.”*

PR6 goes into detail on the necessary upgrades and projects that will be delivered over this period. A key output in the plan is the energisation of 27 no. new 110kV substations (See Section 5.4 Summary of Outputs, PR6). The proposed development is a key element of PR6 which will see ESB invest €13.4 billion invested in electricity infrastructure from 2026-2030.

ESB has a pre-existing leasehold on area of 0.46 Ha within the Raheen Business Park, which is traversed by the Limerick-Moneteen 110 kV Transmission Line. This site was subject to a planning application for a 110 kV/ MV station in 2008 which was granted in February 2009 under planning ref. 08/1236 but never progressed into construction. In order to build a larger 110 kV/ 38 kV /MV substation, land adjacent to the existing leasehold was assessed and the project team deemed it suitable for such a development. Factors such as compatible adjacent land uses, favourable topography, no recorded history of flooding, low geotechnical risk and suitable access for heavy goods vehicles and construction traffic were key considerations in site selection.

This 110 kV/38 kV/ MV station, to be known as the “Ballycummin 110 kV Substation”, is required to reduce load stress on the existing Limerick 110kV/38kV station, reducing loads on adjacent substations serving Raheen, Analogue and Cloughkeating. In addition, the proposed substation will aid in transferring load from existing Raheen and Patrickswell 38kV/MV stations to the new station at Ballycummin. Furthermore, it will also provide connections to customers in the business park.

3.3 Services

More detailed information on the proposed foul and surface water drainage and water supply can be found in the Engineering Services Report submitted as part of the planning application.

4 Environmental Assessment

4.1 Environmental Impact Assessment

An Environmental Impact Assessment (EIA) is not required for this project, as confirmed in the EIA Screening Report submitted as part of the planning application. Refer to the EIA Screening Report for further detail.

An Environmental Assessment of the proposed development is detailed in the Environmental Report submitted as part of this planning application. The report provides details of the scope and approach to the environmental assessment, summary of the assessment findings relative to each environmental topic such as Biodiversity, Land, Soils, Geology and Hydrogeology, Air Quality and Climate, Noise and Vibration, Archaeological and cultural Heritage, Landscape and Visual, Population and Human Health, Roads and Traffic, Waste and their interactions with each other. A schedule of Mitigation Measures has been prepared and appended to the Environmental Report. Please refer to the Environmental Report for detailed assessment.

The Environmental Report concludes that the proposed development will not have significant effects on any European sites due to its location and absence of harmful emissions. Mitigation measures have been identified to minimise potential impacts during construction and operation.

4.2 AA Screening

An Appropriate Assessment screening report has been prepared and submitted as part of this planning application.

Based on the findings of the Appropriate Assessment Screening carried out by Moore Group Environmental Services, it can be concluded that the Ballycummin 110kV Substation Proposed Development will not result in significant effects on any European sites.

This conclusion is supported by the absence of ecological connectivity, the distance of approximately 2.4 km from the nearest European site, and the lack of emissions or hydrological links to sensitive areas such as the River Shannon. The development is neither directly connected to nor required for the conservation management of any European site, and no significant effects are anticipated either alone or in combination with other projects. Therefore, an Appropriate Assessment is not required, although the final determination rests with the competent authority. Please refer to the AA screening report for further detail.

5 Planning Policy Context

This section outlines the relevant national, regional and local plans and policies which relate to the development of electrical infrastructure at this site.

5.1 National Planning Policy

5.1.1 National Planning Framework First Revision and the National Development Plan Review 2025

Project Ireland 2040 is the overarching policy guiding the sustainable development of Ireland. This policy is comprised of the National Planning Framework (NPF) First Revision, which sets out a vision for the social and economic growth of the nation to 2040, and the National Development Plan (NDP) Review 2025, which attributes funding to projects which achieve the goals of the NPF.

The development of Ireland's electricity grid is a key part of the NPF, coming under National Strategic Outcome (NSO) 8: *Transition to a Carbon Neutral and Climate Resilient Society*. It is recognised within this NSO that it will be imperative that the national grid is developed and upgraded to accommodate increasing levels of demand and supply, a key element reiterated under National Policy Objective 71:

National Policy Objective 71: *Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development.*

The NDP sets out funding priorities for national, regional, and local projects based on the NSOs outlined in the NPF. Investment priorities for the Irish electricity grid are outlined in the NDP in Chapter 5.8. The NDP outlines that investment in grid infrastructure will enable ESB and EirGrid “*to significantly increase capital investment to expand electricity transmission and distribution network infrastructure*”. The importance of infrastructure development in achieving the wider goals of the NDP and NPF is outlined in Chapter 8.5 of the NDP:

“...this infrastructure is required to underpin the development of all other economic and social infrastructure we need to function as a society. It is also vital to enable the development of the 300,000 homes we need to meet the Government's housing target, and to support our economy's competitiveness.”

The proposed development supports the goals and overall direction of the NPF and NDP and will contribute to a low carbon economy, economic growth, and security of supply.

5.2 National Sectoral Policies

5.2.1 Climate Action Plan 2025

Electricity has a challenge ahead to achieve a 75% reduction in emissions by 2030, based on a 2018 baseline and its success has knock-on implications for other sectors in reaching their target. Achieving the target heavily relies on the continued deployment of renewable energy generation and supporting electrical grid infrastructure enhancements. The plan outlines the importance of strengthening the grid connection to achieve the goals for the electricity sector:

“This represents an immense challenge as the sector not only has a requirement to reduce emissions, but also to meet the increasing electricity demand required for our economy, ensuring the energy security of the State, and supporting those sectors which are decarbonising through electrification.”

The Climate Action Plan 2025 (CAP25) refers to a need for improvements to grid infrastructure which will enable a renewables-led system to radically reduce emissions in the electricity sector, protect our energy security, and ensure our economic competitiveness. CAP25 signifies support for the development of electricity grid enhancements, in order to allow greater capacity on the grid to support the transition to greater renewable generation capacity. The proposed development will be in line with CAP25.

The support for the construction of new and upgrades to existing electricity grid infrastructure outlined in the CAP25, is echoed in the revised NPF and NDP. The proposed development will contribute to the direction within the national planning policies to transition to a low carbon economy while supporting national social and economic development.

5.3 Regional Guidelines

5.3.1 Regional Spatial & Economic Strategy for the Southern Region 2020-2032

The Regional Spatial & Economic Strategy for the Southern Region 2020-2032 (RSES) primarily aims to support the delivery of the programme for change set out in Project Ireland 2040, the NPF and the NDP. The RSES identifies high-level requirements and policies for the Southern Region and establishes a broad framework for the way in which society, environment, economy and the use of land should evolve. In general, the RSES is supportive of the upgrading of electricity infrastructure in the Southern Region, including Limerick City.

The RSES emphasises the need for the electrification of the transport sector and the increased use of renewable energy in the following Regional policy Objectives;

- RPO 87 Low carbon Energy Future
- RPO 91 Decarbonisation in the Transport Sector

- RPO 92 Electric Vehicle Infrastructure
- RPO 93 CNG & EV Infrastructure
- RPO 96 Integrating Renewable Energy Sources

Upgrading of electricity infrastructure, such as the proposed development, is crucial to ensure the capacity is available for an increased reliance on electricity and associated infrastructure.

Additionally, the RSES shows direct support for developments in electricity infrastructure in the following objectives;

RPO 219 New Energy Infrastructure

It is an objective to support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers (subject to appropriate environmental assessment and the planning process) to ensure the energy needs of future population and economic expansion within designated growth areas and across the Region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs.

RPO 222 Electricity Infrastructure

It is an objective to support the development of a safe, secure and reliable supply of electricity and to support and facilitate the development of enhanced electricity networks and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this plan under EirGrid's (2017) Grid Development Strategy (subject to appropriate environmental assessment and the planning process) to serve the existing and future needs of the Region and strengthen all-island energy infrastructure and interconnection capacity.

The proposed development would support the development of a safe, secure and reliable supply of electricity in Raheen Business Park and the wider locality. The proposed development contributes to achieving the objectives of the RSES.

5.4 Local Policies and Objectives

5.4.1 Limerick Development Plan 2022-2028

The Limerick Development Plan 2022-2028, hereafter referred to as the Development Plan, sets out an overall strategy for the proper planning and sustainable development of Limerick over a 6-year period to 2028.

Chapter 8 – Infrastructure, sets out the need for the “*provision of high-quality infrastructure, energy network and environmental services*” to “*ensure the long-term physical, environmental, social and economic prosperity for Limerick City and County.*” The following objective is particularly relevant to the proposed development;

Objective IN O13 Energy and Gas Networks

It is an objective of the Council to:

- a) Support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers (subject to appropriate environmental assessment and the planning process), ensuring the energy needs of future population and economic expansion across Limerick and the wider Southern Region can be delivered in a sustainable and timely manner.*
- b) Protect existing infrastructure and strategic route corridors for energy networks from encroachment by development that might compromise the performance of the networks.*
- c) Require energy transmission infrastructure to comply with best practice with regard to siting, design and least environmental impact, in the interest of landscape protection.*
- d) Require that, in all new developments, multiple services are accommodated in shared strips underground and that access covers are shared, whenever possible. The location of services shall be subterranean, where appropriate. Where existing and proposed high voltage lines traverse new residential, commercial or civic developments, 251 Chapter 8: Infrastructure these should be relocated underground where technically feasible. The Council will require written consent to this relocation as part of the planning application process.*
- e) Support the transition of the gas network to a carbon neutral network by 2050, thereby supporting Limerick to become carbon neutral.*
- f) Support Community Energy Companies to create positive energy districts.*
- g) Ensure that in the delivery of energy infrastructure, the strategic function of the national road network is safeguarded in accordance with national policy by utilising available alternatives.*

The Development Plan outlines the necessity for infrastructure upgrades in order to ensure the energy needs of the current and future populations are met in Limerick. Objective IN 013 above directly supports the proposed development. The development will reinforce the grid in the local area, increasing capacity and allowing for growth in Limerick, especially within the Business Park.

The development has been located and designed in a way which will cause minimal environmental and visual impact and is consistent with the proper planning and sustainable development of the area.

The proposed development is located within Raheen Business Park, which is designated as a 'Strategic Employment Location' in the RSES and the Limerick Development Plan. In accordance with the RSES, the Limerick Shannon Metropolitan Area has capacity for economic growth of a significant scale at Strategic Employment Locations. The following policies and objectives from Chapter 5 in the Development Plan are relevant to the proposed development lands;

Policy ECON P4 Urban Economy

It is a policy of the Council to:

a) Promote, facilitate and enable economic development and employment generating activities in Limerick City Centre, at Strategic Employment Locations and other appropriately zoned locations in a sustainable manner.

b) Facilitate the future sustainable economic development of Limerick City and Suburbs (in Limerick), Mungret and Annacotty to optimise the benefits of its strategic location in the Limerick Shannon Metropolitan Area, in accordance with the National Planning Framework and the Regional Spatial and Economic Strategy.

Objective ECON O17 Strategic Employment Locations City and Suburbs (in Limerick), Mungret and Annacotty

It is an objective of the Council to:

a) Promote, facilitate and enable a diverse range of employment opportunities by facilitating appropriate development, improvement and expansion of enterprise and industry on appropriately zoned lands, accessible by public and sustainable modes of transport, subject to compliance with all relevant Development Management Standards and Section 28 Guidance at Strategic Employment Locations and other appropriately zoned locations in a sustainable manner.

b) Facilitate and support Limerick City Centre, University Hospital Limerick, Raheen Business Park, the National Technology Park, Higher Education Institutes, Public Hospitals, Dock Road, Northside Business Campus, Opera Centre and Cleeves Site as Strategic Employment Locations, identified in accordance with the Limerick Shannon Metropolitan Area Strategic Plan.

The development plan recognises that “These employment areas have potential for expansion and intensification and are linked to a critical mass of skilled workers, served by key infrastructure (water, wastewater, electricity, broadband etc.), with the potential for public and sustainable forms of transport to the City Centre.”

New electricity infrastructure, such as the proposed development, will facilitate the anticipated growth in employment and activity at this Strategic Employment Location in Raheen Business Park. The proposed development is aligned with the objectives set out in the Development Plan, specifically the policies highlighted above.

5.4.2 Land Use Zoning

The proposed development is located on lands zoned ‘High Tech/Manufacturing Campus’ according to the Development Plan. Further detail on this zoning objective is provided below;

Objective: *To provide for office, research and development, high technology, regional distribution/ logistics, manufacturing and processing type employment in a high quality built and landscaped campus style environment.*

Purpose: *To facilitate opportunities for high technology, advanced manufacturing including pharmaceutical and food production, major office, regional distribution/ logistics, and research and development-based employment, within high quality, highly accessible, campus style settings. The zoning is for high value-added businesses and corporate facilities that have extensive/specific land requirements, such as those located at Raheen Business Park and the National Technology Park. These businesses are generally not accessible to members of the public. Retail warehousing will not be acceptable in this zone.*

The uses in this zone are likely to generate a considerable amount of traffic by both employees and service vehicles. Sites should be highly accessible, well designed and permeable with good pedestrian, cyclist and public transport links. The implementation of mobility management plans will be required to provide important means of managing accessibility to these sites.

The proposed development would support the achievement of the objectives on 'High Tech/Manufacturing' zoned lands. While not specifically mentioned in the zoning objective, electricity infrastructure is crucial to facilitate growth on these lands. The development plan reiterates that *"The Local Authority will continue to support investment in and build on the success of the High Tech/Manufacturing zoned lands, which have contributed significantly to the economic growth of Limerick."* This investment in the electricity infrastructure in Raheen Business Park will facilitate opportunities for the types of high value-added businesses and corporate facilities to grow in Raheen Business Park.

6 Planning Assessment

6.1 Compliance with National Energy Policy

As noted in Section 5, the development of Ireland's electricity grid and supporting infrastructure is a significant feature of national, regional, and local energy policies. Reinforcing the grid both at national and local level will enable the achievement of objectives relating to ensuring a secure supply of energy to support population and economic growth. The Climate Action Plan 2025 (CAP25) refers to a need for improvements to grid infrastructure which will allow for the management of greater electricity demand and will support the electrification of crucial energy utilising sectors such as transport and heat. CAP25 signifies support for the development of electricity grid enhancements, in order to allow greater capacity on the grid to support the transition to wider decarbonisation and electrification across the economy. The proposed development will be consistent with CAP25.

6.2 Implementing National Planning Policy

Project Ireland 2040 highlights to the need for upgraded infrastructure throughout both the NPF and the NDP. Chapter 3 of the NDP expresses national support for upgrades to the electricity grid (NDP pg. 37): *The reliability of electricity supplies will be strengthened through investment in the electricity transmission and distribution grid.*

Reinforcing the grid and ensuring security of electricity supply is considered a national level priority in the NDP (pg. 125):

“Security of energy supply - Energy supply is vital for the proper functioning of society and the economy. Over two million customers rely on the electricity grid and 700,000 customers on the natural gas grid to heat and power their homes and businesses. Ensuring continued security of energy supply is considered a priority at national level and within the overarching EU policy framework in which our energy markets operate.”

Ireland's national planning policies outline the need for continued investment in infrastructure to keep up with projected growth in population and industry. The proposed development would constitute investment in the electricity grid and would therefore align with national planning priorities. The proposed development will aid in the transition to a low carbon economy while supporting national social and economic development.

6.3 Implementing Regional Spatial Economic Strategy

The proposed development is aligned with objectives set out in the Regional Spatial and Economic Strategy for the Southern Region. In particular, *RPO 219 – New Energy Infrastructure* which emphasises the need for the Southern Region to have electricity infrastructure which not only caters to present needs but allows for future growth and development in the region. The importance of reinforcing the grid in this region is detailed on pg. 214:

“A safe, secure and reliable supply of energy is critical to a well-functioning Region. With projected increases in population and economic growth, the demand for energy is set to increase in the coming years. In moving towards a more energy efficient society and an increase in renewable sources, there is a need to set a policy approach which will meet national targets for renewable electricity generation, climate change and security of energy supplies.”

The proposed development will facilitate a safe secure and reliable supply of energy and therefore directly aligns with the planning policies contained in the RSES. The RSES seeks to manage the growth of the region in a sustainable way, the proposed development will facilitate sustainable growth.

6.4 Implementing Limerick Development Plan Policies and Objectives

The proposed development, which will reduce stress on the existing electricity infrastructure network in the area, is supported by policies in the Development Plan. Specifically, Chapter 8 which *“seeks to advance the Strategic Vision of the Plan through the provision of the necessary infrastructure.”* The proposed development is an investment in the infrastructure in Limerick and will increase capacity in the area. The proposed development directly supports the achievement of *Objective IN O13* which sees to upgrade infrastructure in Limerick consistent with the proper planning and sustainable development of the area.

The Development Plan supports the development of electrical infrastructure, and the Development Plan outlines that the development proposals in this regard will be favourably considered subject to proper planning and sustainable development of the area, environmental impacts, mitigation measures and cumulative impact of the proposal. The proposed development has been assessed from a planning and environmental perspective, and it is not anticipated that it will give rise to any significant negative effects.

The proposed development is located in Raheen Business Park and the Development Plan zoned these lands for High Tech/Manufacturing uses. Section 12.1 of the Development Plan outlines that the purpose of zoning land is to reduce land uses conflicting, to protect resources and to ensure land is used to the best advantage. Electrical infrastructure or utilities are not specifically called out as a type of Land Use in the Development Plan Zoning Matrix, even under the ‘Utilities’ Zoning Objective. It is considered that the most relevant land uses listed within the Development Plan matrix to the proposed substation development are ‘Industry - Light’ or ‘Telecommunications Structures’ both of which are Generally Permitted under the High Tech zoning objective. The proposed substation will support both the existing and future uses within this zoning objective and will not conflict with any existing land uses in the area.

The Raheen Business Park is designated a Strategic Employment Location. The Development Plan anticipates significant growth in the Business Park, and it will be crucial that the energy capacity is there to meet this growing demand for industry in

this strategic location. Given the existing industrial nature of the location for the proposed development, it is not anticipated that the proposed development would impact negatively on these lands and would be compatible with neighbouring developments.

This location is home to a number of large multinational companies who in turn enable economic development and employment generating activities. Without the required infrastructure, the full potential of these lands will not be achieved. Increased capacity will allow for growth in the land zoned 'High Tech/Manufacturing' and will therefore indirectly support the achievement of the zoning objective. The proposed development will contribute to the sustainable economic growth of Limerick City and County and ensure that there will be capacity for the future development outlined in the Development Plan.

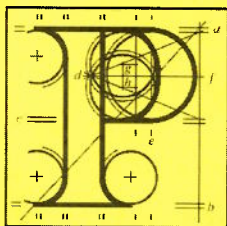
6.5 Planning Conclusion

This 110 kV/38 kV/ MV station, to be known as the "Ballycummin 110 kV Substation", is required to reduce load stress on the existing Limerick 110kV/38kV station and other substations in the Limerick area. Additionally, the proposed substation development will provide connections to customers in Raheen Business Park thereby increasing electricity network capacity in both the immediate and wider areas.

As outlined in National and Regional policy, the electrification of sectors such as transport and heat will give rise to an increased demand for electricity. The proposed development aligns with this by contributing to a secure energy supply and providing additional energy capacity. In addition, on at a local level the Development Plan highlights the anticipated growth in Limerick City and the Raheen Business Park. The proposed electrical substation is necessary to ensure there will be sufficient electrical capacity to provide for the anticipated future growth.

This Planning Report, along with the environmental report which accompanies this planning application, have demonstrated that the proposed development will not impact negatively on the landscape in which it is located. It is not foreseen that there will be conflicts with the surrounding land uses and therefore the proposed development is consistent with the proper planning and sustainable development of the area.

Appendix 1 – An Coimisiún Pleanála SID Screening Decision



An
Bord
Pleanála

Board Direction
BD-019066-25
ABP-321687-25

The submissions on file and the inspector's report were considered at a Board Meeting held on 28/02/202.

The Board decided that the prospective applicant ESB, be informed that: the proposed 110/38kV/MV electrical substation on lands situated in Raheen Business Park, Ballycummin, Co. Limerick, as set out in the plans and particulars received by An Bord Pleanála on the 16th January 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 Board.

The applicant shall be informed that the application documentation should be forwarded to the following the prescribed bodies which are considered relevant in this instance for the purposes of Section 182A(4)(b) of the Act:

- Minister for Housing, Local Government and Heritage
- Minister for the Environment, Climate and Communications
- Limerick City and County Council
- Commission for the Regulation of Utilities
- Transport Infrastructure Ireland
- Uisce Éireann
- Inland Fisheries Ireland
- Office of Public Works
- An Taisce
- Heritage Council
- An Chomhairle Ealaíon
- Fáilte Ireland
- Irish Aviation Authority

- Health & Safety Authority

Further notifications should also be made, where deemed appropriate.

Board Member



Peter Mullan

Date: 03/03/2025

Appendix 2 – List of Prescribed Bodies to be Notified

Appendix 2 – List of Prescribed Bodies to be Notified

- Minister for Housing, Local Government and Heritage
- Minister for the Environment, Climate and Communications
- Limerick City and County Council
- Commission for the Regulation of Utilities
- Transport Infrastructure Ireland
- Uisce Éireann
- Inland Fisheries Ireland
- Office of Public Works
- An Taisce
- Heritage Council
- An Chomhairle Ealaíon
- Fáilte Ireland
- Irish Aviation Authority
- Health & Safety Authority