

Jonathan Dunne

From: McDonald, Janette (Engineering and Major Projects) <janette.mcdonald@esb.ie>
Sent: Monday 16 March 2026 15:50
To: SIDS
Subject: ACP-323893-25 - Ballycummin 110kV Substation
Attachments: ACP-323893-25 Ballycummin 110kV Substation Submissions Response.pdf
Categories: Honor

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A Dhuine Uasail,

In response to the letter dated 3rd February 2026, from the An Coimisiún Pleanála, regarding case ref ACP-323893-25, inviting a response to the copy of submission received on the application; please find attached ESB's response. Hard copies of this submission will be delivered to ACP offices later this week.

Please kindly acknowledge receipt of this email.

If you have any queries with regard to the same please feel free to contact me via email or phone 086 0840492.

Is mise, le meas,
Janette McDonald | Planning and Environmental Consenting Team Lead | Networks Civil & Environmental Engineering | Engineering and Major Projects | ESB
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6 Eastgate Ave, Castleview, Little Island, Co. Cork, T45 YW71.

My location is Eastgate, Cork and I typically work from there every Tuesday. My normal hours of work are 08:30 – 16:45. Feel free to catch up with me in person/book in person meetings – otherwise you can reach me on Teams/e-mail and mobile. At ESB, we are committed to working flexibly while also respecting our right to disconnect. While it suits me to email now, I do not expect a response or action outside your working hours.

An t-impeallacht? - Smaoinigh air sula bpriontáileann tú an r-phost seo.

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Is tuairimí nó dearcthaí an údair amháin aon tuairimí nó dearcthaí ann, agus ní gá gurb ionann iad agus tuairimí nó dearcthaí ESB.

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**An Coimisiún Pleanála,
64 Marlborough Street,
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16 March 2026

**Re: Response to submissions in relation to the proposed development comprising a 110kV substation at Raheen Business Park, Co. Limerick.
ACP Case No. 323893-25**

A Chara,

1. Introduction

On behalf of the Electricity Supply Board (ESB), I refer to the above case number and in particular to correspondence received from An Coimisiún Pleanála (ACP) dated 3rd February 2026, inviting a response to the copy of submission received on the application.

Submissions were received from:

- Development Applications Unit – Department of Housing, Local Government and Heritage (DHLGH)
- Limerick City and County Council
- Tom Ryan
- Transport Infrastructure Ireland
- Uisce Éireann

Generally, the issues raised in the submissions have already been considered in the Planning and Environmental Documents and are addressed by mitigation measures or will be addressed during the detailed design and construction stages for this project, as is common for projects of this nature. The specific submissions are responded to below.



2. Response to Submissions

2.1. DHLGH Development Applications Unit

The DHLGH Development Applications Unit (DAU) notes the inclusion of a desk-based Archaeological Impact Assessment (AIA) in the planning application and is broadly in agreement with the findings in relation to Archaeology and Cultural Heritage as set out therein.

The DAU suggest specific Archaeological conditions which align with Sample Conditions C4 and C5 as set out in OPR Practice Note PN03: Planning Conditions (October 2022).

ESB is willing to accept conditions as suggested by the DAU.

2.2. Limerick City and County Council (LCCC)

The submission from the planning authority set out LCCC's response in relation to the relevant planning application. The submission sets out the site context, planning history, relevant planning policy and provides an assessment of the proposed development.

The following points raised by Limerick City and County Council have been noted, and ESB have no further related comment in relation to these points:

- The Planning Authority consider that the proposed development is acceptable in principle given the land use zoning and the location within Raheen Business Park.
- The Planning Authority note that the strengthening of the electricity network is required to facilitate future development in the region as per Government Climate Action Plan targets.
- The proposed development would not detract from the existing visual amenities of the area.
- The proposed development will not increase the risk of flooding within the site or on adjacent lands.
- The Conservation Officer considered the proposed development to be acceptable and that it is unlikely to have architectural heritage impacts.
- The Council Archaeologist recommends conditions to be attached if permission is granted.
- The Environment and Climate action department have no objection subject to conditions.
- The Roads Department have no objections subject to proposed conditions.



- Confirmation of feasibility of foul water discharge and water supply has been included in the planning application documentation.
- Council Ecologist has requested a number of conditions relating to lighting, vegetation removal, ecological enhancement features and works in the Meadow Barley protection area. These are noted.

ESB wish to provide clarity on two of the items raised by LCCC as follows. ESB's response is presented in **bold** following extracts from LCCC's report for clarity.

- LCCC noted the following in relation to AA:
"However, the phase 2 component of the Eli Lilly construction project (planning ref: 2461160) was considered to require a full AA based on the following logic (as per NIS document on file) "Given the nature of the construction works, recognising that the existing surface water sewer that outfalls into the Loughmore Canal which discharges to the Barnakyle River will be diverted and that during both construction and operation surface water drainage infiltrates to the ground onsite with local groundwater flowing east to west towards the Barnakyle River, it is considered that there is an indirect hydrological pathway to Lower River Shannon SAC & River Shannon and River Fergus Estuaries SPA". Given that there may well be temporal overlap in the construction phases of these proposals combined with the ongoing construction of the multiple other proposals in the area the need for full AA based on potential cumulative impacts may well require consideration by An Coimisiún Pleanála."

Please note that it is not proposed to do any work to outfalls the Loughmore Canal as part of the proposed development. It is ESB's understanding that the majority of works on the drainage on the Eli Lilly site and in particular the connection to the main storm water drain and culvert connected to the Loughmore Canal are already complete. Furthermore, earthworks on the Eli Lilly site are expected to be completed approximately at the end of 2026 on that site. This work will therefore not coincide with the proposed substation construction.

Refer to the Ecological Technical Note prepared by Moore Group on behalf of ESB, attached to this letter for further clarification (see Appendix I).

- LCCC has noted the following in relation to the Loughmore Common Turlough pNHA:
"Natural Heritage Area – Loughmore Common Turlough (pNHA 000438) is located across the road from the site. An ecological impact assessment (EclA) is recommended



to determine potential impacts on pNHA, due to potential surface water connectivity. Water quality protective measures could be conditioned.”

Chapter 4 of the Environmental report submitted with the planning application presents an EclA of the proposed development in line with best practice guidance. Several ground and surface water protection measures, in line with SUDS best practice, are proposed to be in place during construction and operation as detailed in Section 2.3 of this letter and in the documents submitted with the application. Further comment with regard to potential ecological impact on Loughmore Common Turlough pNHA is included in the Ecological Technical Note prepared by Moore Group on behalf of ESB, attached to this letter.

Furthermore, LCCC state that the proposal is broadly supported by the Development Plan and that in the event of a grant of permission it is recommended that 9 no. conditions are attached.

The responses to the proposed conditions are outlined below: -

1. *Condition 1:* **ESB notes this proposed condition and has no objection.**
2. *Condition 2 - LCCC have requested payment of a financial contribution:* **ESB notes that there is no provision to include development contributions for applications made under S182A of the Act. As such, ESB would request that ACP do not attach this proposed condition should permission be granted.**
3. *Condition 3:* **ESB notes this proposed condition and has no objection.**
4. *Condition 4:* **ESB notes this proposed condition and has no objection.**
5. *Condition 5:* **ESB notes the inclusion of this condition in relation to vehicular and pedestrian safety.**

However, in relation to Condition 5(a), (b) and (c), ESB understands that the guidelines for the safety audit set out in the GE-STY-01024 Section 1.2 state that the following – *“This Standard sets out the procedures required to implement Road Safety Audits on National Road Schemes only”*. The Environmental Report submitted with the application states that the proposed access to the substation is through a new



entrance on to Roches Avenue. Roches Avenue is within the Raheen Industrial Estate and has a speed limit of 25 km/hr, so it is not anticipated that a road safety audit is necessary. In relation to the request for tactile paving, we refer to drawing PE492-D184-067-019-000 submitted with the application for detail.

In respect of Condition 5(d), due to the future provisions catered for in the Proposed Ballycummin 110 kV Substation, all future cable routes cannot be known at this time and as such cannot be agreed with Limerick County and City Council prior to commencement of development. Prior to construction of any future underground cable, all works along the public road will be subject to a Road Opening Licence (ROL). The application for the ROL will include a full traffic management plan, the details of which will be agreed with Limerick County or City Council prior to the submission of the ROL application. Reinstatement of the works will be in accordance with the *“Guidelines for Managing Opening in Public Roads (Purple Book)”* and Limerick County Council’s specific requirements. In addition, ESB will comply with *“Interim Guidance to Road Authorities regarding the proposed placement of Medium or High Voltage electricity assets, including ducts, cables, and associated infrastructure under public roads”* and the procedures outlined therein. These actions, or updated actions in line with updated guidance at the time of making new customer connections, are required to occur regardless of any condition to a grant of planning permission and therefore a related condition is not considered a necessity.

In relation to 5(e), as the facility will typically be unmanned, there will be visits to the site for scheduled and unscheduled inspections, maintenance and repairs as necessary. During normal operations, approximately 6 vehicle movements a week are expected to occur on average. Given that operational traffic will be limited to approximately six vehicle movements per week, the provision of additional ‘STOP’ signage is not considered necessary. Refer to Section 3.4.6 of the Environmental Report for further detail on site access and traffic during operation. Any construction related road traffic signage can be dealt with in the construction stage Traffic Management Plan (TMP) which, if conditioned can be agreed with the local authority in advance of commencement. Refer to Section 3.5.6 of the Environmental Report for detail on the construction traffic.

ESB notes the wording of Condition 5(f), (g), (h), (i) and (j) and has no further comment.



6. **Condition 6:** ESB notes the proposed condition and has no objection to same. Should a similar condition be attached to a grant of permission, ESB will liaise with LCCC as required.
7. **Condition 7:** ESB notes that some of the proposed conditions referenced do not appear in the OPR guidelines. ESB welcomes the inclusion of conditions that align with Appendix B of Planning Conditions – Practice Note PN03 issued by OPR and mitigation measures proposed in the documents submitted with the application.
8. **Condition 8:** ESB notes the proposed condition and has no objection.
9. **Condition 9:** ESB notes the proposed conditions under 9(a) and (b) and has no further comment.

In relation to Condition 9 (c), ESB notes that as per the submitted Landscape Management and Maintenance Schedule, native hedgerow planting (92 linear metres) and native tree planting (15 no. trees), as well as wildflower meadow management, will enhance the ecological value of the site. These ecological enhancement features will provide suitable supporting habitat for mobile species present in the surrounding environment, such as birds and bats. Given the electrical nature of the proposed development, and limited footprint within ESB's ownership during the operational phase, bird and bat boxes are not considered suitable for this site.

In relation to Condition 9 (d), ESB note that as per the submitted Section 4.4 Planning and Environmental Considerations Report (PECR), the only works proposed within the Meadow Barley translocation area will involve manual re-stringing cables between the two re-sited cable towers. This work will be carried out with the minimum of disturbance to the grassland habitat. All plant and equipment required to re-string the lines, will set up at the mast locations outside meadow barley area.



2.3. Tom Ryan

The submission by Tom Ryan has raised concerns in relation to the connection between the proposed development and the potential discharge of hazardous substances into the Loughmore Canal. The response to the concerns outlined in this submission are detailed below in **bold**:

ESB Response to concerns regarding discharge into ground and surface water:

Construction Phase: Section 5.5 of the Environmental Report and Section 7 of the CEMP submitted with the planning application detail proposes measures to prevent impacts in surface and ground water during the construction phase. These include but are not limited to the following:

- **Construction Management (including CEMP and RWMP)**
- **Ground Conditions and Excavated Material**
- **Surface Water Management & Pollution Control including measures to control the following:**
 - (i) **Concrete run-off**
 - (ii) **Accidental spill and leaks**
 - (iii) **Monitoring**

Operation Phase: Section 3.4 of the Environmental Report and Section 3 of the Engineering Services Report, submitted along with the planning application proposes measures to prevent impacts to surface and ground water during the operation phase. These include but are not limited to the following:

- **Bunded oil containing equipment**
- **Soakaway**
- **Oil sensitive dewatering systems**

ESB Response to concerns regarding interactions with the Karst Environment:

As stated in Section 5.5 of the Flood Risk Assessment and Section 5 of the AA Screening submitted with the application, the GSI mapping shows no evidence of karstification within the site boundary. Section 5.3.7 of the Environmental Report states that the GSI karst data base indicates two turloughs to the south and northwest of the site. Also, refer



to the Ecological Technical Note prepared by Moore Group on behalf of ESB (see Appendix I), attached to this letter for clarity with regard to the related ecological concerns raised.

ESB Response to concerns regarding protection of Aquifers and Groundwater:

Section 5.3.5 of the Environmental Report submitted with the application states that the GSI National Draft Bedrock Aquifer Map for the site indicates that the site is predominantly underlain by a Locally Important Aquifer – Bedrock which is Generally Moderately Productive, with eastern portion of the site underlain by a Locally Important Aquifer – Bedrock which is Moderately Productive only in local Zones. The proposed substation compound will be located within the latter zone.

The mitigation and monitoring measures are proposed in Section 5.5.1.2 of the Environmental Report to prevent any spills or leaks resulting in groundwater or surface water quality impacts during construction.

During Operation phase, any accidental discharges to soil, groundwater or surface water is minimised by the maintenance of a robust surface and foul water drainage system (including oil interceptors), appropriate management of generator and transformer bunding, as mentioned in Section 5.5.2 of the Environmental Report.

ESB can confirm there is no proposal to install fluid filled cables as part of the proposed development.

2.4. Transport Infrastructure Ireland (TII)

TII have addressed the proposed development in relation to the provisions of official policy and in relation to national road network maintenance and safety in accordance with National Strategic Outcome 2 of the National Planning Framework 'Enhanced Regional Accessibility.'

The submission from TII is noted.



2.5. Uisce Éireann (UÉ)

Uisce Éireann confirms that ESB have engaged with them via a Pre-Connection Enquiry and that the water connection feasible (July 2025). 4 no. conditions have been suggested by Uisce Éireann to be attached to any grant of permission.

ESB is willing to accept conditions as suggested by Uisce Éireann.

3. Conclusion

I trust that you have all the require information to progress the assessment of the application. If you do have any queries, please do not hesitate to get in touch by email at janette.mcdonald@esb.ie or by mobile - 0860840492.

Yours Sincerely,

Janette McDonald

Planning and Environmental Team Lead

ESB Engineering and Major Projects



Appendix I

- Ecological Technical Note



moore

archaeological & environmental services

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To:	An Coimisiún Pleanála
In relation to:	Ballycummin 110kV Substation
Date:	13 March 2026

A Dhaoine Uaisle,

A Report for AA Screening was prepared by Moore Group on behalf of the ESB.

It was determined in the Report for AA Screening that *'there are no notable surface water features onsite and no direct hydrological pathways to offsite surface water bodies. This was confirmed during fieldwork on habitat assessment on 29 July 2025.*

There will be no discharge of surface water to the IDA public surface water network during construction, see Sections 3.4.1 and 11.4.1 of the Environmental Report and Section 7.6 of the CEMP, which have been submitted in support of this application.

The adjacent IDA-Eli-Lily site drainage diversion works were fully completed in 2025, thus there is no potential for in-combination effects. Additionally, the previously permitted earthworks at the Eli Lilly site are expected to be completed approximately at the end of 2026. These works will therefore not coincide with the proposed substation construction.

The Section 5.5 of the Engineering Services Report states that; *'there is no evidence of springs or karstification within the site boundary'*.

The level of earth movement required during construction is not likely to have a significant effect on groundwater. It may also be noted that the areas of the site located within the redline boundary in proximity to the Loughmore Common Turlough pNHA involves stringing of cables only and no groundworks.

During operation, only clean surface water will be directed via a sustainable urban drainage system to a soakaway, see Section 3.4.1 of the Environmental Report, Section 2.4.1 of the Engineering Services Report PE595-F0545-R545-002-000, and the drainage drawing PE492-D184-067-017-000, which have been submitted in support of this application.

The employment of SuDS may be considered at Stage 1 AA Screening. The proposed flow-controlled overflow from the soakaway into the IDA public surface water network to discharge the excess water

may be considered an indirect, controlled, distant pathway to the Loughmore Common Canal and Barnakyle River with a high degree of dilution to the River Shannon.

This Technical Note is to confirm that:

- The consideration of the above listed points does not alter the finding of no significant effects or the determination of the Report for AA Screening submitted with the application.

Is sinne, le meas

A handwritten signature in black ink, appearing to read 'Ger O'Donohoe'.

Ger O'Donohoe M.Sc.

Principal Ecologist & Environmental Manager

Moore Group