

Honor Caird Marren

From: Keogh, Caroline <caroline.keogh@limerick.ie>
Sent: Monday 26 January 2026 16:50
To: SIDS
Cc: O'Keeffe, Grainne; Leland, Aine
Subject: 323893-25
Attachments: 25-323893 cover letter.docx; 25323893 -Planners Report.pdf

Categories: Honor

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Hi

Please see attached report/cover letter for 323893-25.

Regards & thanks,

Caroline Keogh | Staff Officer | Planning, Heritage & Ryder Cup Directorate
Limerick City and County Council
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Pleanáil, agus Cruthú Áite
Comhairle Cathrach agus Contae Luimnigh
Bothar Thuar an Dail
Tuar an Dail, Luimneach
V94 WV78

Planning and Place-Making
Limerick City and County Council
Dooradoyle Road
Dooradoyle, Limerick
V94 WV78

26/01/2026

An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902

By email: sids@pleanala.ie

Re: ACP-323893-25 - Strategic Infrastructure Development - the construction of a new 110/38kV/MV electrical substation and ancillary development at Roches Avenue, Raheen Business Park, Limerick.

Dear Sir/Madam,

I refer to the above proposed SID and to the Coimisiún's letter to Limerick City and County Council of 26th November 2025.

In response, please find enclosed the submission of the Planning Authority on the above application.

Please contact the undersigned if you have any queries.

Yours sincerely,

Caroline Keogh
Staff Officer
Planning Department
Phone: 061 556 575
Email: caroline.keogh@limerick.ie



Comhairle Cathrach
& Contae **Luimnigh**

Limerick City
& County Council

**REPORT IN ACCORDANCE WITH THE REQUIREMENTS OF SECTION 182A(1)
OF THE PLANNING AND DEVELOPMENT ACT 2000 (AS AMENDED) IN
RELATION TO THE BALLYCUMMIN 110 Kv SUBSTATION.**

ACP REFERENCE: 323893-25

1. Introduction

This report has been prepared in accordance with the requirements of Section 182A(1) of the Planning and Development Act, 2000, as amended, following on from the submission of a Strategic Infrastructure Development (SID) to An Coimisiún Pleanála, for a new 110kV Gas Insulated Switchgear (GIS) substation at Roches Avenue, Raheen Business Park, Limerick City.

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

The proposal is not subject to the statutory requirements for applications under section 37E of the Planning and Development Act 2000 (as amended) and does not require the formal submission of a manager's report to the elected members prior to submission to the Commission. The report will however respond to the range of issues set out in the Commissions letter to the Planning Authority dated 26th November 2025.

2. Description of Site

The site is 5.45ha in size and is located on Roches Avenue within the Raheen Business Park on the outskirts of Limerick City. The existing substation is on the south side of Roches Avenue while the new substation is proposed on the north side of Roches Avenue and is bounded by Eli Lilly to the west, Stryker to the north and Regeneron to the south on the opposite side of Roches Avenue. The general area is made up of high tech/manufacturing and industrial uses.

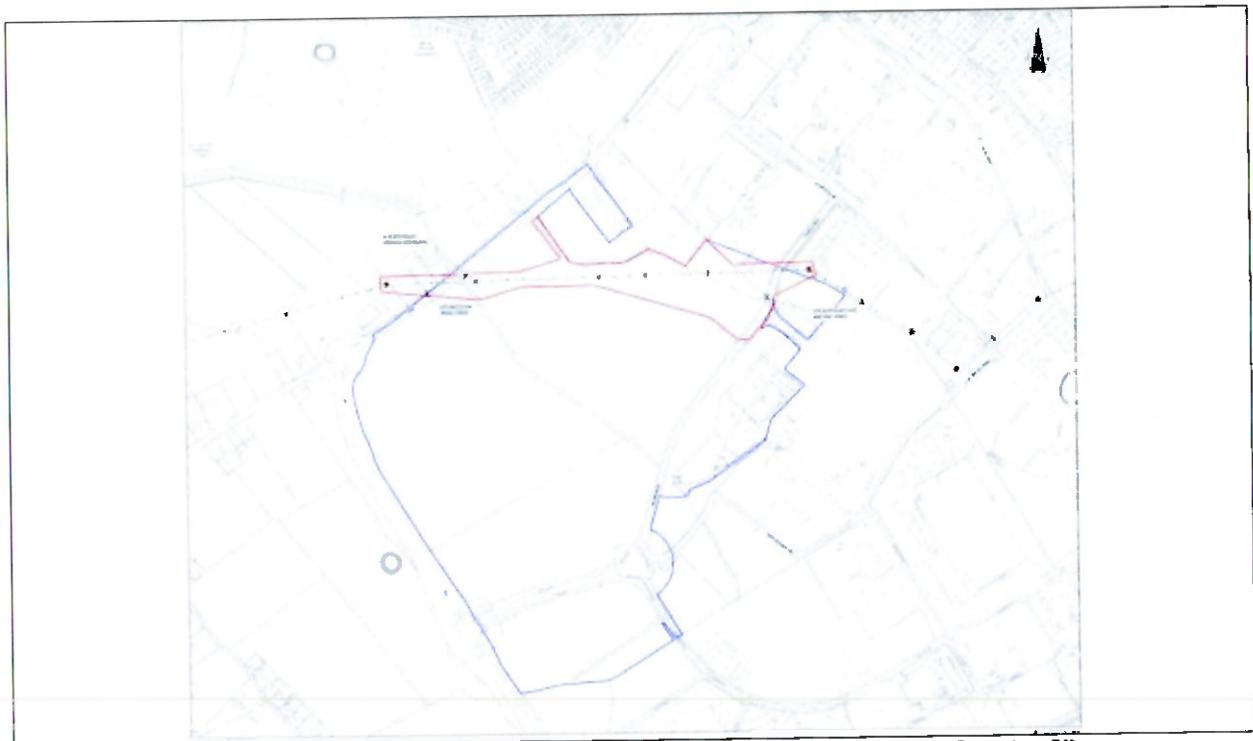


Figure 1 - Site location (taken from submitted Drawings and outlined in 'red')

3. Description of the Proposed Development

The proposed SID development provides for the following at Roches Avenue, Raheen business Park, Limerick:

- A new 110kV Gas Insulated Switchgear (GIS) Substation to provide for additional electricity network capacity both in the immediate and wider area.
- Removal of four existing 110 kV Overhead Line timber pole sets (c. 15 m in height) and c.800 m of Overhead Line conductor;
- Relocation of existing Interface Transformer;
- 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.; 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.; 7 m in height);
 - iv. Two bundled 110 / 38 kV power transformers (c. 5 m high) with associated electrical equipment;
 - v. Two bundled 38 / 20 kV power transformers (c. 5 m high) with associated electrical equipment;
 - vi. Three Arc Suppression Coils (c. 4 m high) 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 (OHL) line 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)
- site development works which include the provision of access roads, car parking area, lighting, telecommunications, fencing, landscaping, site services including drainage and all other ancillary works.

The application has been accompanied by the following documentation:

- AA Screening
- Construction and Environmental Management Plan.
- EIA Screening
- Engineering Services Report
- Environmental Report
- Flood Risk Assessment
- Landscape Management Plan and associated drawings
- Planning report
- Resource & Waste Management Plan

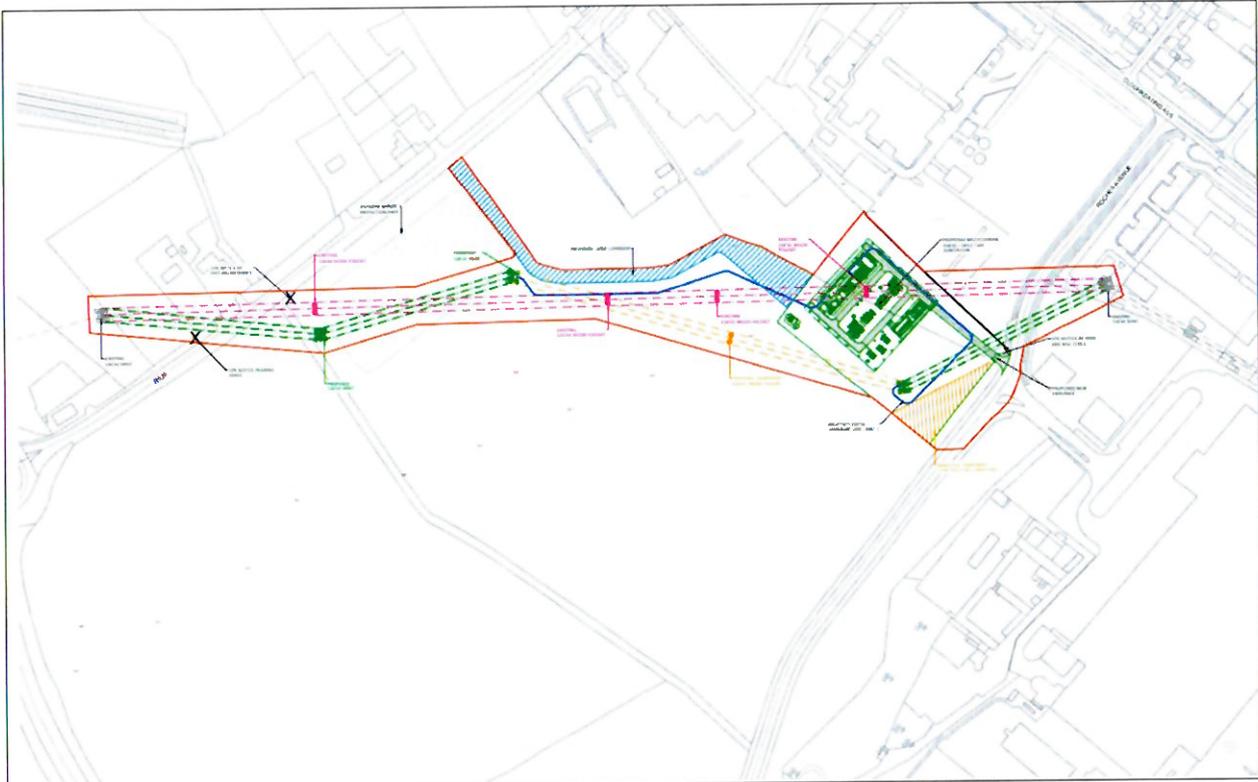


Figure 2 - Project Layout Map (taken from submitted Planning Report)

4. Planning History

24/61160

Eli Lilly Kinsale Ltd were granted conditional permission for a 10-year permission for development at our existing Biopharmaceutical Manufacturing Campus, located at Ballycummin, The IDA Business and Technology Park, Raheen, County Limerick. The proposed development consists of extensions, modifications, alterations and new structures to previously permitted and partly built Biopharmaceutical Manufacturing Campus (Limerick City and County Council Reg. Ref. 22190 and as amended by planning permission Reg. Ref. 23152), with a proposed total additional floor area of approximately 67,997 square metres, located on the existing Eli Lilly site, north of Ballycummin Avenue and bounded by Patrickswell Road (R526).

23/152

Eli Lilly Kinsale Ltd were granted conditional permission for development consisting of modifications and alterations to previously permitted Biopharmaceutical Manufacturing Campus (Planning Register Reference Number 22/190). The proposed development that consists of the following; (1) The relocation of the previously permitted single storey Maintenance Building, sized approximately 1,200 square metres, to the position on site of the footprint of the previously permitted Freezer Building. The previously permitted 2 storey Freezer Building, sized approximately 1,694 square metres, will not be constructed as part of this amended application. (2) The relocation of the previously permitted Tank Farm from its permitted position at the rear of the Warehouse to a revised location within the yard between the Maintenance and the Central Utilities Plant (CUP) Building including pipe bridges all located to the east of the site. The proposed Tank Farm consists of reconfigured and resized tanks. (3) The relocation of 4no. of the previously permitted Boiler Stacks and the omission of 1 no. previously permitted Boiler Stack. The 4no. relocated Boiler Stacks will be approximately 18 metres high and will be located to the north of the previously permitted

Central Utilities Plant (CUP) Building. (4) The installation of 1no. additional Cooling Tower to the roof of the previously permitted Central Utilities Plant (CUP) Building, and the modification of the previously permitted acoustic screen to enclose this additional Cooling Tower and the addition of 1no. Cooling Tower at Ground Level within the Tank Farm area. (5) The construction of 1 no. new recessed Loading Dock to the north elevation of the previously permitted warehouse. (6) The relocation of 2no. previously permitted Bulk Gas Tanks from the front of the Production Facility to the position on site of the footprint of the previously permitted Maintenance Building and the installation of 1no. additional Bulk Gas Tank including local pipe bridges. (7) The proposed development also consists of minor modifications to previously permitted internal roads and footpaths, site lighting, landscaping, underground drainage system infrastructure including a reduction of roofed areas and all associated site works. This application consists of a development for an activity for which a licence under Part IV of the Environmental Protection Agency Act 1992 (as amended by the Protection of the Environment Act, 2003) is required.

22/190

Eli Lilly Ltd were granted conditional 10 year permission for development of a Biopharmaceutical Manufacturing Campus with an overall floor area of 47,384 sqm. Construction of a 4-storey Biopharmaceutical Manufacturing building approx. 18,534 sqm and 33 metres high with roof-mounted plant/equipment & solar panels. A 2-storey canteen, laboratory and administration building. A 2-storey Warehouse building. A single storey Central Utilities Plant (CUP) building including 5no. Boiler stacks. A 2-storey freezer building. A single storey maintenance building. Single storey pedestrian link with roof-mounted pipe rack. Provision of car parking spaces approx. 199, accessible car parking/motorcycle spaces, EV vehicle charging, dedicated car-pooling spaces/cycle parking. Visitor car park comprising 12no. car parking spaces. Single-storey Security building. Single storey Visitor Centre building. Single storey bicycle/shower facility building. A 38kv Substation compound consisting of single storey substation building. Step-down transformers and single storey Electrical Switchroom building enclosed by security fencing and a new vehicular entrance from Roches Avenue. Firewater and Supply Water pumphouse. Minor off-site underground works include extension of foul sewer to connect to the foul water system. Single storey Waste building. Site infrastructure includes bunded tank farm, pipe-bridges, sprinkler/water tanks, surface water harvest tanks, docks/yard areas, items of plant and equipment, electrical generators, gas-reducing station, underground pumping facilities and internal roads/paths, fencing and site lighting. The development includes use of existing permanent vehicular entrance to the site off existing roundabout on Ballycummin Avenue. Proposed Landscaping, replacement of perimeter security fencing/gates. An extensive ground mounted solar array sized 27,000 sqm located to the rear and east of the site. Signage at ground level and on the building façade. The works include Temporary Contractor Compounds and carparking during construction. All Associated Site Works. Surface water management for the site consists of attenuation swales/ponds, rainwater harvest cisterns to achieve 100% recharging within the site. This application consists of a development for an activity for which a licence under Part IV of the EPA Act 1992 (as amended by the Protection of the Environment Act, 2003) is required. A Natura Impact Statement and an Environmental Impact Assessment Report accompanies this planning application.

17/1170

Regeneron Ireland UC granted conditional 10 year permission for a single storey manufacturing extension sized 12,707 square meters gross and 14.4 meters high. The manufacturing facility is located to the rear of the existing manufacturing building (to the south east) and consists of the following functions: 1. A multipurpose manufacturing area sized 6,705 square meters, 2. A plant room area sized 1,680 square meters, 3. A waste handling facility sized 626 square meters, 4. Miscellaneous mezzanines housing plant and equipment within the buildings sized 3,696 square meters, 5. The proposed development

includes a revised dock area, revisions to underground services, external items of plant and equipment, roof mounted plant and equipment, 2 no. boiler stacks 20 meters high, external equipment and modular storage for industrial materials on site, pipebridges and modifications to existing elevations, 6. New site works include a permanent car park for 150 cars located to the south west of the existing car park, landscaping, lighting and ancillary items. This application consists of an activity for which a license under Part IV of the Environmental Protection Agency Act 1992 (as amended) is required and full details of the proposed development and its anticipated environmental impacts will be notified to the Environmental Protection Agency. An Environmental Impact Assessment Report accompanies this application.

08/1236

Electricity Supply Board granted conditional permission for the construction of a new 110kv to medium voltage electricity transformer station comprising a walled inner compound containing a control building, two no. 110kv to mv power transformers with bunding, an associated oil interceptor and two no. 110kv circuit breakers. A 110kv capacitor bank with three no. capacitors and three associated series coils. Two no. 20kv series coils, surge arrestors and neutral earth resistor. The retirement of four no. 110kv polesets and associated overhead line with the erection of two no. 110kv lattice steel cable transition towers. A new splayed entrance from Roche's Avenue to station access road with concrete post and rail fence to outer station boundary and ancillary site works between Roches Avenue and the R526. The development was never constructed.

5. Pre-Application Discussions

The documentation submitted indicates that pre-planning discussions were held with ACP (ref: 321687-25) and it was confirmed that the development came within the scope of Section 182A of the Planning and Development Act 2000, as amended and is a Strategic Infrastructure Development and as such the application for planning consent for the proposed development is being made directly to An Coimisiún Pleanála.

6. Planning Policy Context

6.1 Government Policy Statement on Security of Electricity Supply, Nov. 2021

This policy statement notes that electricity is vital for the proper functioning of society and the economy. The statement lists challenges to ensuring security of electricity supply, including:

- Ensuring adequate electricity generation capacity, storage, grid infrastructure, interconnection and system services are put in place to meet demand – including at periods of peak demand; and
- Developing grid infrastructure and operating the electricity system in a safe and reliable manner.

Page 5 of the policy statement notes the Government has approved “that it is appropriate for additional electricity transmission and distribution grid infrastructure, electricity interconnection and electricity storage to be permitted and developed in order to support the growth of renewable energy and to support security of electricity supply”.

6.2 Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure

This statement notes the strategic importance of investment in networks and energy infrastructure, with such development expected to take account of all relevant standards.

6.3 Flood Risk Management Guidelines

These Guidelines seek to avoid inappropriate development in areas at risk of flooding and avoid new developments increasing flood risk elsewhere and they advocate a sequential approach to risk assessment and a justification test.

6.4 National Planning Framework (First Revision 2025)

NPO 71- Support the development and upgrading of national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development.

6.5 Regional Spatial and Economic Strategy for the Southern Region 2020-32

RPO 87: Low Carbon Energy Future

The RSES is committed to the implementation of the Government's policy under Ireland's Transition to a Low Carbon Energy Future 2015-30 and Climate Action Plan 2019. It is an objective to promote change across business, public and residential sectors to achieve reduced GHG emissions in accordance with current and future national targets, improve energy efficiency and increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport and agriculture.

RPO 91: Decarbonisation in the Transport Sector

It is an objective to: a. Seek initiatives that will achieve the decarbonisation of the transport sector, moving to the use of clean generated electricity biogas, hydrogen and other non-fossil fuels for private and public transportation and provision of clean energy and lower carbon fuelling stations by 2030; b. Pursue policies to reduce reliance on private cars and achieve modal shift to sustainable transportation in conjunction with policies to achieve compact growth and reduce congestion; c. Seek the development of clean energy and lower carbon fuelling and electric vehicle charging stations and infrastructure at the appropriate locations including consideration of electric, hydrogen, Compressed Natural Gas (CNG)/biogas.

RPO 92: Electric Vehicle Infrastructure

It is an objective to: a. Support investment in the sustainable development of Electric Vehicle charging facilities aligned with our Region's transportation networks; b. Through Local Authority County Development Plans and Local Area Plans, encourage and support policies and objectives to integrate Electric Vehicle charging point infrastructure within residential, commercial and mixed-use developments

RPO 93: CNG & EV Infrastructure

It is an objective to: a. Support investment in the sustainable development of CNG refuelling stations aligned with the TEN-T corridors as a renewable technology for servicing public service vehicles and commercial fleets; b. Seek the provision of EV charging point infrastructure within residential, commercial and mixed use developments.

RPO 96: Integrating Renewable Energy Sources

It is an objective to support the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure to integrate a renewable energy sources and ensure our national and regional energy system remains safe, secure and ready to meet increased demand as the regional economy grows.

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.

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.

6.6 Limerick Development Plan 2022 – 2028

Zoning – High Tech/Manufacturing

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.

(Excerpt from) Table DM6: Design Guidelines for High Tech/Manufacturing, Warehousing, Business Park, Enterprise and Employment Centres.

Utilities structures • The location of new utilities infrastructure such as electricity substations, communication equipment cabinets, should not be located forward of the main/front building line, or on areas of open space visible from the public road. Such structures should be sensitively designed to assimilate with the design of the overall development and maintained to a high standard by the relevant service provider

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 Cleaves Site as Strategic

Employment Locations, identified in accordance with the Limerick Shannon Metropolitan Area Strategic Plan.

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, 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.

Policy CAF P5 Managing Flood Risk

It is a policy of the Council to protect Flood Zone A and Flood Zone B from inappropriate development and direct developments/land uses into the appropriate lands, in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 (or any subsequent document) and the guidance contained in Development Management Standards and the Strategic Flood Risk Assessment (SFRA). Where a development/land use is proposed that is inappropriate within the Flood Zone, but that has passed the Plan Making Justification Test, then the development proposal will need to be accompanied by a Development Management Justification Test and Site-Specific Flood Risk Assessment in accordance with the criteria set out under The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 and Circular PL2/2014 (and any subsequent updates). This will need to demonstrate inclusion of measures to mitigate flood and climate change risk, including those recommended under Part 3 (Specific Flood Risk Assessment) of the Site Specific Plan Making Justification Tests detailed in the SFRA. In Flood Zone C, the developer should satisfy themselves that the probability of flooding is appropriate to the development being proposed and should consider other sources of flooding, residual risks and the implications of climate change.

Objective CAF O20 Flood Risk Assessments

It is an objective of the Council to require a Site-Specific Flood Risk Assessment (FRA) for all planning applications in Flood Zones A and B and consider all sources of flooding (for example coastal/tidal, fluvial, pluvial or groundwater), where deemed necessary. The detail of these Site-Specific FRAs (or commensurate assessments of flood risk for minor developments) will depend on the level of risk and scale of development. The FRA will be prepared taking into account the requirements laid out in the SFRA, and in particular in the Plan Making Justification Tests as appropriate to the particular development site. A detailed Site-Specific FRA should quantify the risks, the effects of selected mitigation and the

management of any residual risks. The assessments shall consider and provide information on the implications of climate change with regard to flood risk in relevant locations.

7. Environmental Impact Assessment / Appropriate Assessment

The requirements for Environmental Impact Assessment (EIA) are outlined in Part X of the Planning and Development Act 2000 (as amended) and Part 10 of the Planning and Development Regulations 2001, as amended. Schedule 5 of the Regulations sets out the various classes and thresholds of development which require mandatory EIA. Part 1 of Schedule 5 lists projects for which mandatory EIA is required on the basis of their type while Part 2 of the same schedule lists projects on the basis of their relevant scale/size threshold that requires EIA.

There are no classes of development within Schedule 5 of the Regulations, that are applicable to the proposed development.

The proposed development which constitutes the provision of an electrical substation does not fall into a class of development contained in Schedule 5, Parts 1 or 2. Class 15 of the Schedule 5 states that EIA can be required in the case of a development listed in Part 2 that does not exceed a limit specified if it is considered that it that would be likely to have significant effects on the environment having regard to the criteria set out in Schedule 7 of the Regulations (Sub-threshold EIA). As the proposed development is not of a class listed there is no threshold for EIA and accordingly a subthreshold EIA is not applicable.

An Appropriate Assessment (AA) submitted with the application and reviewed by the Councils Ecologist.

The AA screening concludes that there are no annex habitats within the footprint of the proposal. The author goes on to conclude as follows;

“The Proposed Development is not likely to either directly or indirectly significantly affect the Qualifying interests or Conservation Objectives of the European sites considered in this assessment. The Proposed Development, either alone or in combination with other plans or projects, is not likely to have significant effects on a European site. It is possible to conclude that significant effects can be excluded at the screening stage. This finding is considered accurate”.

However, the phase 2 component of the Eli Lilly construction project (planning ref: 2461160) was considered to require 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 multiple other proposals in the area the need for full AA based on potential cumulative impacts may well require consideration by An Coimisiún Pleanála.

8. Views of the authority on the effects of the proposed development on the environment and the proper planning and sustainable development of the area of the authority

Principle of Development

The site is on lands zoned high tech/manufacturing and is within the Raheen business Park which is made up of primarily industrial/high tech/manufacturing uses. While neither the zoning objective or zoning matrix make allowances specifically for substations, given the surrounding uses and the fact that the proposal will transfer the load from the existing adjacent substation the proposed development is considered acceptable in principle.

Proposed Development

The proposed development will contribute to additional capacity and improvements in the security of supply for the area. The existing substation is a 2x63 MVA 110/30 kV station. Due to multiple applications for new connections, there will be significant additional loads of 27.2 MVA on the existing substation. Therefore, a new station is required to cater for the load stress in Limerick Station. The new Ballycummin station will facilitate a reconfiguration of connections to various customers and to other substation in the area, in order to reduce existing loadings. There is very limited capacity available in the region for the future electrification of Heat and Transport as per Government CAP targets. Considering the development initiatives in the region of Raheen Business Park it is predicted that the development of this region will happen at a very fast pace. In order to facilitate future developments, the strengthening of the electricity network is required.

Details of structures

The existing 110kV overhead line connection the existing 110kV mast to the east and the existing 110kV mast on the west side of the R526 is to be removed. Three new 110kV masts are proposed ranging in height from 17m to 21m and which will be connected by new overhead lines and underground cables. A new single storey substation compound with a gfa of 5950sqm. Within the compound are a number of structures including a single storey pitched roof 38kV building which houses a gas room and switch gear room with galvanized steel and cement slates to roof, a two storey 110kV building which houses a control room, cable room, battery room at ground floor and a GIS switch gear room at first floor with galvanised steel as external finishes and ARC suppression coil bunds and transformer bund. A 2.6m high palisade fence will surround the substation compound and the compound itself will be gated with a galvanised gate which accommodate a pedestrian access along with vehicular access.

Visual Impact

There are no visual or scenic designations in the vicinity of the site. Having regard to the existing character of industrial/manufacturing style buildings in the area, the proposed development would not detract from the existing visual amenities of the area. Visual impacts on the protected structure Roches Castle area considered further below.

Flooding

The site is located within Flood Zone C. As set out in the Flood Risk Management Guidelines substations are considered highly vulnerable developments. As set out in Table 3.2 of the Guidelines highly vulnerable development including essential infrastructure is an appropriate development within Flood Zone C. I note that the application is accompanied by a Flood Risk Assessment which concludes that the site is not at risk of flooding. Furthermore, surface water proposals will be developed to mimic the natural drainage patterns of the site and will not increase the current flood risk in the catchment. Given the nature and scale of the proposal, and the fact that it does not involve any displacement of existing flood storage or alteration of natural drainage patterns, the development will not increase the risk of flooding either within the site or on adjacent lands.

Conservation

There are no known protected structures within the vicinity of the site. The site is located adjacent to and above the entrance avenue and gates to Roche's Castle which is a protected

structure therefore the predicted impacts on architectural heritage relate to the new mast adjacent to the historic entrance. The application has been reviewed by the Conservation Officer who notes that the submitted drawings indicate that there will be no physical impacts to the entrance avenue or entrance gates. There are potential visual impacts on the view of the entrance gates from the streetscape, however as there is an existing double pole set of comparable height in the vicinity of the proposed new mast, this visual impact is considered to be negligible. Furthermore, the location for the proposed new mast in this area is at a greater distance from the entrance gates than the existing poles. As such, the proposed location of the substation compound is acceptable and unlikely to have any architectural heritage impacts.

Archaeology

There are no known archaeological monuments within the confines of the site however as per comments received from the Council Archaeologist there have been several previously unknown archaeological sites found in adjacent developments. As such, conditions to be attached if permission is granted.

Access

A new access is proposed off Roches Avenue which will require a section of the existing footpath, post and rail fence, cycle lane and verge to be removed. A new 4m galvanised steel tubular gate is proposed at the access along with a new concrete rail fence along the inside of the tree line. An aco drain is proposed at the new entrance. Kerbs are to be dropped and will be finished with tactile paving. Roads Department have reviewed and are satisfied subject to conditions.

Surface water

Surface water from the site will be collected on site by a new drainage network which will discharge to a new soakaway which has a tank with a storage capacity of 189cu.m. this soakaway system will manage flows during storm events. The new access road within the site will be drained to the underground drainage infrastructure through the use of gullies and then discharged into the soakaway to allow for infiltration into the ground. An outfall pipe from the soakaway is also provided to allow water to leave site during heavy rainfall events, when the rain entering the underground drainage system surpasses the Infiltration rate. The outfall pipe will be fitted with a flow control device to limit the flow exiting the site to 2l/s/ha or the greenfield runoff rate. The remainder of the compound area of the substation will comprise of a permeable surface which will provide a means of attenuating runoff and allow rainwater to saturate the soil. Roads Department have reviewed and are satisfied subject to conditions.

Foul Water

It is proposed to discharge foul water generated by the welfare facilities in the substation building to the existing foul water infrastructure within the northern footpath of Roches Avenue. A new foul sewer is proposed to convey wastewater to the existing infrastructure. The applicant notes that a pre connection enquiry was made to Uisce Eireann and a copy of the confirmation of feasibility has been included in the documentation submitted.

Water supply

It is proposed to connect to the 300mm diameter uPVC watermain located within Roches Avenue via a 100mm diameter connection. The applicant notes that a pre connection enquiry was made to Uisce Eireann and a copy of the confirmation of feasibility has been included in the documentation submitted.

Lighting

2 no. 15m lighting monopoles are proposed internally within the compound and an additional 22 no. 5.75m lighting columns with a post top lantern are proposed along the side boundaries of the compound. Given the proposed use on site same is considered acceptable. Council Ecologist is requesting that all external lighting at the compound is sensor controlled to prevent light spill.

Ecology

It is noted that the existing poles and overhead lines traverse the meadow barley protection area which are proposed to be removed which means that works are to occur within an area designated as protected for an FPO species under a separation planning application (24/61160). Council Ecologist notes that this may give rise to complications regarding the integrity of the protected site and the potential need for a derogation licence. Council Ecologist recommends that an appropriate condition is attached to any grant of permission.

Natural Heritage Area - Loughmore Common Turlough (pNHA 000438) is located across the road from the site. An ecological impact assessment (EcIA) is recommended to determine potential impacts on pNHA, due to potential surface water connectivity. Water quality protective measures could be conditioned.

9. Internal Reports

Conservation Officer – report received 22/12/25

The proposal is generally acceptable. The predicted impacts on architectural heritage relate to the proposed new Mast adjacent to the historic entrance avenue to Roche's Castle, a Protected Structure. The submitted drawings indicate that there will be no physical impacts to the entrance avenue or entrance gates (both located within the curtilage of Roche's Castle). There are potential visual impacts on the view of the entrance gates from the streetscape, however as there is an existing double pole set of comparable height in the vicinity of the proposed new mast, this visual impact is considered to be negligible. I note that the location for the proposed new mast in this area is at a greater distance from the entrance gates than the existing poles.

The proposed location of the substation compound is considered acceptable, and unlikely to have architectural heritage impacts.

Council Archaeologist – report received 19/12/2025

Notes that there has been several previously unknown archaeological sites found in adjacent development therefore on foot of a grant of permission, conditions are to be attached.

Environment and Climate Action - report received 15/01/26

No objection subject to a resource waste management plan to include the following:

- a. A list of proposed authorised waste collection permit holders to be employed.
- b. A list of the proposed waste facility permitted sites at which the wastes may be recovered or disposed of.
- c. Estimates of the proposed tonnages of construction and demolition (C&D) wastes by type e.g. soil and stone, rubble, wood, metal and plastic.
- d. Details of how the RWMP will be measured for and monitored for effectiveness.

MWNRDO – report received 12/12/25

No observations to make

Roads Department – report received 16/01/26

No objection subject to conditions

Council Ecologist – report received 23/01/26

Notes concerns and conditions to be attached to any grant of permission.

Development Contributions

Section 6.0 of Limerick City & County Councils Development Contribution Scheme 2025 details the development contribution charges. The development as proposed would be considered under *development not previously mentioned in the scheme* under *other categories of development*. As such a contribution of €40 per sqm is required.

Gfa of compound = 5950sqm x €40 = €238,000.00

Substation - €2000

Total = €240,000.00

Conclusion

The above report sets out the views of the Planning Authority in accordance with Section 182A(1) of the Planning and Development Act, 2000, as amended. It is respectfully requested that the Board take the above issues into consideration in the assessment of this application.

In summary the Planning Authority notes that the proposal is broadly supported by the Limerick Development Plan 2022-2028 in a long established industrial area within the Raheen Business Park.

In the event of a grant of permission it is recommended that appropriate conditions are attached for the proposed development including bond condition, road network, ecology, archaeology, surface water and construction management.



Áine Leland
Executive Planner
Limerick City & County Council
23rd January 2026



Gráinne O'Keeffe
Senior Executive Planner
Limerick City and County Council
26th January 2026

Appendix 1: Recommended Conditions

The Planning Authority recommends the following conditions in addition to standard conditions relating to development contributions, special development contributions, bond, decommissioning etc.

1. The development shall be carried out in accordance with the plans and particulars lodged with the application except as may otherwise be required in order to comply with the following conditions.

Reason - In order to clarify the development to which this permission applies.

2. The developer shall pay to Limerick City & County Council a financial contribution of €240,000.00 (two hundred and forty thousand euro) in respect of public infrastructure and facilities benefiting development in the area of the Planning Authority that is provided or intended to be provided by or on behalf of the Authority in accordance with the terms of the Development Contribution Scheme made under Section 48 of the Planning & Development Act 2000 (as amended). The contribution shall be paid prior to the commencement of development or in such phased payments as the Planning Authority may facilitate and shall be subject to any applicable indexation provisions of the Scheme at the time of payment.

Reason- It is a requirement of the Planning & Development Act 2000 (as amended) that a condition requiring a contribution in accordance with the Development Contribution Scheme made under Section 48 of the Act be applied to the permission.

3. (a) During construction of the proposed development, the following shall apply-
 - No work shall take place on site outside the hours of 8.00 a.m. to 8.00 p.m. Monday to Friday and 8.00 a.m. to 4.00 p.m. Saturday, or on Sundays or public holidays, unless otherwise agreed in writing by the Planning Authority.
 - No surface water run-off shall be discharged onto public roads, foul sewers or adjacent property.
 - Adequate car parking facilities shall be provided on site for all workers and visitors.
 - Deliveries shall be off peak.
- (b) The wheels and underside of all construction traffic leaving the site shall be cleaned, as required, to prevent soiling of public roads. A wheel washing facility, including water jets or other approved cleansing method shall be provided close to the site exit. If any public roads become soiled by construction traffic from the site, these roads shall be cleaned immediately.

Reason - In the interest of the proper planning and sustainable development of the area, road safety and to protect the amenity of the area.

4. Any clearance of vegetation from the development site shall only be carried out in the period outside of the bird nesting/breeding season (1st September – end of February).

Reason – to avoid the destruction of nest, nestings and eggs of breeding birds.

5. (a) Prior to commencement of development drawings and supporting information shall be submitted to, and agreed in writing with the Planning Authority and which shall include the following information:
 - A Stage 1/2 Road Safety Audit shall be submitted for approval and must be completed and submitted by the Applicant to the Planning Authority for agreement prior to the commence of the development in compliance with the TII Publication 'Road Safety Audit GE-STY-01024'
 - The Applicant shall submit details of the proposed Audit Team for written agreement with the Planning Authority for approval prior to proceeding with the Audit.
 - Show tactile paving either side of junction on the pedestrian desire line.
 - Submit swept path analysis.
- (b) A Stage 3 Road Safety Audit shall be submitted and agreed in writing by the Planning Authority upon completion of the development prior to the development coming into full operation. The RSA must be in compliance with the TII Publication 'Road Safety Audit GE-STY-01024'. The Audit Team must be independent in line with the standard.
- (c) The developer shall address all problems raised with the stage 1/ 2 and 3 Audits in full and submit revised Site Layout Plans to include the recommendations of the Audits, which must be clearly labelled for the agreement of the Planning Authority.
- (d) Based on the information submitted to support the application there is no proposal to underground any cabling within Limerick City and Councils Road Network. Any works that may affect Limerick City and Councils Road Network must be agreed prior to the commencement of the proposed development.
- (e) Include for 'STOP' road markings and signage at the proposed entrance.
- (f) The gradient of the access road should not be greater than 2% for 15m from the junction.
- (g) Ensure sightlines and stopping sight distances in line with "DMURS" are achieved.
- (h) The developer shall apply to Limerick City and County Council for an 'Abnormal Load Permit' to transport the large substation components prior to the commencement of the development.
- (i) A Site-Specific Temporary Traffic Management Plan (TTMP) identifying all construction sites, temporary parking areas and delivery routes for various types of material and structural units shall be submitted for the written agreement with the Planning Authority prior to the commencement of the development.
- (j) The Applicant shall be made aware that any works to our road network including junctions will require a Road Opening Licence (ROL).

Reason – in the interest of vehicular and pedestrian safety

6. Drawings and supporting information showing compliance with Limerick City and County Council's Surface Water & SuDs Specification shall be submitted to and agreed in writing with the Planning Authority prior to the commencement of the development.
 - a) Show road gullies and connections.

- b) Show SuDS features as part of the design. Include detailed cross sections showing construction build up with clear specification and shall include overflow systems.
- c) Submit detail cross section of the proposed soakaway showing construction build up with clear specification.
- d) If infiltrating to ground submit infiltration test results by way of the BRE 365 Method with supporting photographs to clearly demonstrate that it is a viable option.
- e) If infiltrating to ground, an Aquifer Vulnerability Assessment shall be undertaken on to determine if infiltration is appropriate. Infiltration systems should not be proposed above vulnerable groundwater. This shall include details of the aquifer classification and groundwater vulnerability.
- f) Submit a Stage 1 and stage 2 Storm Water Audit.
- g) The developer shall put measures in place to manage/prevent all surface water from their site entering onto the roadway. The developer is to manage surface water by constructing a channel across the access and piping it to internal surface water system.
- h) The developers Consulting Engineers shall submit certification for the Surface Water/SuDS Specification that it has been constructed as designed upon completion of the development.
- i) Upon completion of the development and prior to its use, a Stage 3 Completion Storm water Audit to demonstrate that the proposed surface water system has been installed and are working as designed and that there are no misconnections or damage to storm water drainage infrastructure during construction, shall be submitted for written agreement with the Planning Authority.
- j) The discharge levels shall not exceed 2 l/s/ha.
- k) A maintenance plan shall be submitted and agreed with the Planning Authority for the Surface Water/Suds System prior to the commencement of the development.
- l) All surface water run-off from the development shall be disposed of appropriately. No such surface water shall be allowed discharge onto adjoining properties or onto the public road.
- m) All surface water run-off from the public road, which flows into the site, shall continue to be accommodated within the site unless alternative arrangements acceptable to Limerick City & County Council are carried out. Full details of any such alternative arrangements shall be submitted to the Planning Authority and agreed prior to commencement of development.

Reason- In the interest of public health and to prevent flooding in the interest of traffic safety and amenity.

- 7. (a) Prior to commencement of development the developer shall notify the Planning Authority of any site operation (including hydrological and geotechnical investigations) relating to the proposed development.
- (b) Employ a suitably qualified archaeologist who shall apply for a licence to monitor all site investigations, excavation works and all ground disturbance associated with the development.
- (c) Submit the name of the suitably qualified archaeologist to the Planning Authority four weeks in advance of the commencement of any site works (including site investigations) accompanied by a site specific letter from the archaeologist certifying that they have applied for a licence.
- (d) Submit on completion of the ground works a report detailing the results of the licensed archaeological monitoring works to the Department of Housing, Local Government & Heritage and the Planning Authority. The report shall contain a drawing showing the exact extent of the area that was archaeologically monitored certified by the archaeologist. Excavators should include a catalogue of excavated

features with 12 figure ITM coordinates for the centre point of each feature. In the event that the development is phased, interim reports shall be submitted at each stage showing the area monitored and giving preliminary results.

(e) Should archaeological material be found during the course of monitoring, the archaeologist may have work on the site stopped, pending a decision as to how best to deal with the archaeology. The Development Applications Unit, National Monuments Service, Department of Housing, Local Government & Heritage and the Planning Authority Archaeologist shall be informed immediately. The developer shall be prepared to be advised by the National Monuments Service, Department of Housing, Local Government & Heritage and the Planning Authority with regard to any necessary mitigating action.

(f) Should an archaeological excavation be required then the following shall apply: the developer shall provide satisfactory arrangements for the recording and excavation of any archaeological material that may be considered appropriate to excavate and shall undertake to complete all post excavation analysis up to and including final report stage. Excavators should include a catalogue of excavated features with 12 figure ITM coordinates for the centre point of each feature. Within twelve months of the completion of the excavation a final report (in the format recommended in the Guidelines for Authors of Reports on Archaeological Excavations 2006 National Monuments Service) shall be submitted to the Planning Authority

Reason - In order to conserve the archaeological heritage of the site and to secure the preservation of any remains which may exist within the site.

8. Prior to commencement of development the developer shall submit to Planning Department for agreement in writing a site specific Resource Waste Management Plan (RWMP) as set out in the "Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for C&D Projects (2021)". The RWMP shall include:
 - a. A list of proposed authorised waste collection permit holders to be employed.
 - b. A list of the proposed waste facility permitted sites at which the wastes may be recovered or disposed of.
 - c. Estimates of the proposed tonnages of construction and demolition (C&D) wastes by type e.g. soil and stone, rubble, wood, metal and plastic.
 - d. Details of how the RWMP will be measured for and monitored for effectiveness.
 - e. All records relating to the agreed RWMP should be made available for inspection at the site offices at all times.

Reason - In the interest of sustainable waste management.

9.
 - (a) Any vegetation removal should include timing of works around bird nesting season and in the case of suitable trees peak bat activity season
 - (b) External lighting at substations compounds etc to be sensor controlled to prevent light spill
 - (c) Installation of bird nest boxes, bat boxes and other ecological enhancement features designed by an appropriately qualified ecologist should be implemented
 - (d) Any works in the meadow barley area must be preceded by a specialist botanical survey to assess whether there may be damage to a habitat specifically designated as

a protection and translocation zone for a species listed under the floral protection order. A derogation licence should be sought if required.

Reason - In the interest of nature conservation.

Appendix 2: Internal Reports

1.0 Conservation Officer



S.I.D. Application Referral Report Architectural Conservation

Planning Ref: 25/323893

Applicant: Electricity Supply Board (ESB)

Development Description: S.I.D. Permission for:
“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. 800m 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); ili. 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 banded 110 / 38 kV power transformers (c. 5 m in height) with associated electrical equipment; v. Two banded 38 / 20 kV power transformers (c. 5 m in height) with associated electrical equipment; vi. Three banded 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. 17m 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. 510m of OHL conductor); xii. 110 kV underground cabling between the 110 kV GIS building and the new line / cable interface end masts; xili. 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.”

Location: Roches Avenue, Raheen Business Park, Limerick.

R.P.S. Reg. No.: 1671 – Roche’s Castle

A.C.A.: N/A

N.I.A.H. Reg. Ref.: 21901309 – Roche’s Castle.
N.I.A.H. Garden Survey Ref.: N/A
Report Prepared By: Shóna O’Keeffe, Executive Architectural Conservation Officer

Date: 22nd December 2025

Definitions: In considering this report and its contents, the reader is advised to bear in mind at all times that, in S.2 of the Planning and Development Act, 2000, a Protected Structure is defined as follows:

A “structure” means any building, structure, excavation, or other thing constructed or made on, in or under any land, or any part of a structure so defined, and-

(a) where the context so admits, includes the land on, in or under where the structure is situate, and

(b) in relation to a protected structure or proposed protected structure, includes-

(i) the interior of the structure,

(ii) the land lying within the curtilage of the structure,

(iii) any other structures lying within that curtilage and their interiors, and

(iv) all fixtures and features which form part of the interior or exterior of any structure or structures referred to in subparagraph (i) or (iii)”.

Comments: The proposed development is located adjacent to and above the entrance avenue and gates to Roche’s Castle, a Protected Structure. The avenue and gates are within the curtilage of this Protected Structure, as previously defined by Limerick City and County Council.

Assessment

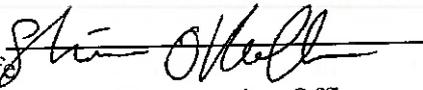
I have examined the documentation submitted in support of the application.

The proposal is generally acceptable. The predicted impacts on architectural heritage relate to the proposed new Mast adjacent to the historic entrance avenue to Roche’s Castle, a Protected Structure. The submitted drawings indicate that there will be no physical impacts to the entrance avenue or entrance gates (both located within the curtilage of Roche’s Castle). There are potential visual impacts on the view of the entrance gates from the streetscape, however as there is an existing double pole set of comparable height in the vicinity of the proposed new mast, this visual impact is considered to be negligible. I note that the location of the proposed new mast in this area is at a greater distance from the entrance gates than the existing poles.

The proposed location of the substation compound is considered acceptable, and unlikely to have architectural heritage impacts.

Recommendation:

I have no architectural heritage concerns in relation to this proposed development.

Signed: 
Shóna O’Keeffe
Executive Architectural Conservation Officer

Date: 22nd Dec’ 2025

2.0 Council Archaeologist



Comhairle Cathrach
& Contae Luimnigh

Limerick City
& County Council

Planning Application Internal Report

Planning Ref: 25/323893

Applicant: Electricity Supply Board (ESB)

Development Description: 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. 800m 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); ili. 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 banded 110 / 38 kV power transformers (c. 5 m in height) with associated electrical equipment; v. Two banded 38 / 20 kV power transformers (c. 5 m in height) with associated electrical equipment; vi. Three banded 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); vili. One new 110 kV double circuit overhead line (OHL) angle mast (c. 17m 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. 510m of OHL conductor); xii. 110 kV underground cabling between the 110 kV GIS building and the new line / cable interface end masts; xili. 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

Address: Roches Avenue, Raheen Business Park

Date of Referral: 03.12.2025

Report Prepared By: Sarah McCutcheon, Local Authority Archaeologist

Comments: The new substation compound is over 0.5ha and greenfield. There have been several previously unknown archaeological sites found in adjacent developments.

Recommendation: No objections subject to the following conditions:

Condition 1:

10. Notify the Planning Authority in writing at least four weeks prior to the commencement of any site operation (including hydrological and geotechnical investigations) relating to the proposed development.
11. Employ a suitably qualified archaeologist who shall apply for a licence to monitor all site investigations, excavation works and all ground disturbance associated with the development.
12. Submit the name of the suitably qualified archaeologist to the Planning Authority four weeks in advance of the commencement of any site works (including site investigations) accompanied by a site specific letter from the archaeologist certifying that they have applied for a licence.

Condition 2:

- a. Submit on completion of the ground works a report detailing the results of the licensed archaeological monitoring works to the Department of Housing, Local Government & Heritage and the Planning Authority. The report shall contain a drawing showing the exact extent of the area that was archaeologically monitored certified by the archaeologist. Excavators should include a catalogue of excavated features with 12 figure ITM coordinates for the centre point of each feature. In the event that the development is phased, interim reports shall be submitted at each stage showing the area monitored and giving preliminary results.
- b. Should archaeological material be found during the course of monitoring, the archaeologist may have work on the site stopped, pending a decision as to how best to deal with the archaeology. The Development Applications Unit, National Monuments Service, Department of Housing, Local Government & Heritage and the Planning Authority Archaeologist shall be informed immediately. The developer shall be prepared to be advised by the National Monuments Service, Department of Housing, Local Government & Heritage and the Planning Authority with regard to any necessary mitigating action.
- c. Should an archaeological excavation be required then the following shall apply: the developer shall provide satisfactory arrangements for the recording and excavation of any archaeological material that may be considered appropriate to excavate and shall undertake to complete all post excavation analysis up to and including final report stage. Excavators should include a catalogue of excavated features with 12 figure ITM coordinates for the centre point of each feature. Within twelve months of the completion of the excavation a final report (in the format recommended in the Guidelines for Authors of Reports on Archaeological Excavations 2006 National Monuments Service) shall be submitted to the Planning Authority

Reason - In order to conserve the archaeological heritage of the site and to secure the preservation of any remains which may exist within the site.



Signed:

Local Authority Archaeologist

Date: 19.12.2025

3.0 Environment and Climate Action

From: McDonagh, Michael <michael.mcdonagh@limerick.ie>
Sent on: Thursday, January 15, 2026 12:27:16 PM
To: plandev <planning@limerick.ie>
CC: DL - C and D Waste <CandDwaste@limerick.ie>; Leland, Aine <aine.leland@limerick.ie>
Subject: 25 323893 Michael McDonagh



Planning Application Internal Report

Planning Ref: 25 323893

Applicant: Electricity Supply Board (ESB)

Development Description:

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. 800m 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); ili. 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 banded 110 / 38 kV power transformers (c. 5 m in height) with associated electrical equipment; v. Two banded 38 / 20 kV power transformers (c. 5 m in height) with associated electrical equipment; vi. Three banded 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); vili. One new 110 kV double circuit overhead line (OHL) angle mast (c. 17m 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. 510m of OHL conductor); xii. 110 kV underground cabling between the 110 kV GIS building and the new line / cable interface end masts; xili. 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.

Development Location: Roches Avenue, Raheen Business Park, Limerick

Recommendation:

The following should be Conditioned into the Planning Decision.

Item 1: Resource Waste Management Plan

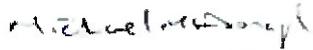
Prior to **initiating any works** at this development, the site developer or appointed contractor shall submit to Planning Department for agreement in writing a site specific Resource Waste Management Plan (RWMP) as set out in the “Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for C&D Projects (2021)”. The RWMP shall include:

- f. A list of proposed authorised waste collection permit holders to be employed.
- g. A list of the proposed waste facility permitted sites at which the wastes may be recovered or disposed of.
- h. Estimates of the proposed tonnages of construction and demolition (C&D) wastes by type e.g. soil and stone, rubble, wood, metal and plastic.
- i. Details of how the RWMP will be measured for and monitored for effectiveness.

All records relating to the agreed RWMP should be made available for inspection at the site offices at all times.

A template waste management plan can be found on our website at: <https://www.limerick.ie/council/construction-and-demolition-waste>

Signed



Michael McDonagh, E.S
Environment and Climate Action

Date: 15/01/2026

4.0 MWNRDO

Óifig Dearadh Bóthar
Náisiúnta an Mheáin Iarthair
Comhairle Cathrach & Contae Luimnigh

Teach Lios an Fháilteigh,
Tuam an Daik, Luimneach



Mid West
National Road Design Office
Limerick City & County Council

Lissaha'ta House, Donrad Doyle Road,
Donrad Doyle, Limerick

Our Ref: 0000:04/01127

Date: 12 December 2025

Harry Henn
Limerick City & County Council
Planning & Environmental Services
Civic Offices
Donrad Doyle
Limerick

Re. Planning Ref. No. 25/23893

Applicant: Electricity Supply Board

Barry

I refer to the above application.

The Mid West National Road Design Office has no observations to make in relation to the above application.

Regards

Jari Howard
Senior Engineer



Telephone: 061 951000

Mid West National Road Design Office is a collaboration of
Limerick City & County Council and Tipperary County
Council.



e mail: info@midwestroads.ie

Comhairle na hEoghain agus Óifig Dearadh Bóthar Náisiúnta an Iarthair
an Chathair agus Contae Luimnigh agus Comhairle Contae Thír Eoghain
2025

5.0 Roads Department



Comhairle Cathrach
& Contae **Luimnigh**

Limerick City
& County Council

Planning Application Internal Report

Planning Ref: 25323893
Applicant: Electricity Supply Board (ESB)
Development Address: Roches Avenue, Raheen Business Park, Limerick

Development Description: 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. 800m 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); ili. 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 banded 110 / 38 kV power transformers (c. 5 m in height) with associated electrical equipment; v. Two banded 38 / 20 kV power transformers (c. 5 m in height) with associated electrical equipment; vi. Three banded 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. 17m 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. 510m 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

Report Prepared By: Tony Carmody

Date: 16.01.2026

Comments:

1. Roads

- (a) Drawings and supporting information shall be submitted to, and agreed in writing with the Planning Authority prior to the commencement of the development to include the following information:
- A Stage 1/2 Road Safety Audit shall be submitted for approval and must be completed and submitted by the Applicant to the Planning Authority for agreement prior to the commence of the development in compliance with the TII Publication 'Road Safety Audit GE-STY-01024'
 - The Applicant shall submit details of the proposed Audit Team for written agreement with the Planning Authority for approval prior to proceeding with the Audit.
 - Show tactile paving either side of junction on the pedestrian desire line.
 - Submit swept path analysis.

- (b) A Stage 3 Road Safety Audit shall be submitted and accepted by the Planning Authority upon completion of the development. The RSA must be in compliance with the TII Publication 'Road Safety Audit GE-STY-01024'. The Audit Team must be independent in line with the standard.
- (c) The Applicant shall address all problems raised with the stage 1/ 2 and 3 Audits in full and submit revised Site Layout Plans to include the recommendations of the Audits, which must be clearly labelled for acceptance by the Planning Authority.
- (d) Based on the information submitted to support the application there is no proposal to underground any cabling within Limerick City and Councils Road Network. Any works that may affect Limerick City and Councils Road Network must be agreed prior to the commencement of the proposed development.
- (e) Include for 'STOP' road markings and signage at the proposed entrance.
- (f) The gradient of the access road should not be greater than 2% for 15m from the junction.
- (g) Ensure sightlines and stopping sight distances in line with "DMURS" are achieved.
- (h) The Applicant shall apply to Limerick City and County Council for an 'Abnormal Load Permit' to transport the large substation components prior to the commencement of the development.
- (i) A Site-Specific Temporary Traffic Management Plan (TTMP) identifying all construction sites, temporary parking areas and delivery routes for various types of material and structural units shall be submitted for the written agreement with the Planning Authority prior to the commencement of the development.
- (j) The Applicant shall be made aware that any works to our road network including junctions will require a Road Opening Licence (ROL).

2. Surface Water Management Plan

13. Drawings and supporting information showing compliance with Limerick City and County Council's Surface Water & SuDS Specification shall be submitted to and agreed in writing with the Planning Authority prior to the commencement of the development.
 - Show road gullies and connections.
 - Show SuDS features as part of the design. Include detailed cross sections showing construction build up with clear specification and shall include overflow systems.
 - Submit detail cross section of the proposed soakaway showing construction build up with clear specification.
 - If infiltrating to ground submit infiltration test results by way of the BRE 365 Method with supporting photographs to clearly demonstrate that it is a viable option.
 - If infiltrating to ground, an Aquifer Vulnerability Assessment shall be undertaken on to determine if infiltration is appropriate. Infiltration systems should not be proposed above vulnerable groundwater. This shall include details of the aquifer classification and groundwater vulnerability.
 - Submit a Stage 1 Storm Water Audit.

- The Applicant shall put measures in place to manage/prevent all surface water from their site entering onto the roadway. The Applicant is to manage surface water by constructing a channel across the access and piping it to internal surface water system.
14. The Applicants Consulting Engineers shall submit certification for the Surface Water/SuDs Specification that it has been constructed as designed upon completion of the development.
 15. Prior to commencement of development, the developer shall submit to the Planning Authority for written agreement a Stage 2 – Detailed Design Stage Storm Water Audit.
 16. Upon completion of the development and prior to its use, a Stage 3 Completion Storm water Audit to demonstrate that the proposed surface water system has been installed and are working as designed and that there are no misconnections or damage to storm water drainage infrastructure during construction, shall be submitted for written agreement with the Planning Authority.
 17. The discharge levels shall not exceed 2 l/s/ha.
 18. A maintenance plan shall be submitted and agreed with the Planning Authority for the Surface Water/Suds System prior to the commencement of the development.
 19. All surface water run-off from the development shall be disposed of appropriately. No such surface water shall be allowed discharge onto adjoining properties or onto the public road.
 20. All surface water run-off from the public road, which flows into the site, shall continue to be accommodated within the site unless alternative arrangements acceptable to Limerick City & County Council are carried out. Full details of any such alternative arrangements shall be submitted to the Planning Authority and agreed prior to commencement of development.

Reason- In the interest of public health and to prevent flooding in the interest of traffic safety and amenity.

3. Construction Management and Delivery Plan

21. During construction of the proposed development, the following shall apply-
 - No work shall take place on site outside the hours of 8.00 a.m. to 8.00 p.m. Monday to Friday and 8.00 a.m. to 4.00 p.m. Saturday, or on Sundays or public holidays, unless otherwise agreed in writing by the Planning Authority.
 - No surface water run-off shall be discharged onto public roads, foul sewers or adjacent property.
 - Adequate car parking facilities shall be provided on site for all workers and visitors.
 - Deliveries shall be off peak.
22. The wheels and underside of all construction traffic leaving the site shall be cleaned, as required, to prevent soiling of public roads. A wheel washing facility, including water jets or other approved cleansing method shall be provided close to the site exit. If any public roads become soiled by construction traffic from the site, these roads shall be cleaned immediately.

Reason - In the interest of the proper planning and sustainable development of the area, road safety and to protect the amenity of the area.

Recommendation:

Approval subject to conditions.

Signed



Tony Carmody

Date: 16.01.2026

6.0 Council Ecologist



Planning Application Internal Report (SID opinion report)

Planning Ref: 25323893

Applicant: Electricity Supply Board (ESB)

Development Description:

Report Prepared By: Seán Doyle, MSc., BSc. Hons - Ecologist.

Permission is sought for 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. 800m 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); ili. 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 banded 110 / 38 kV power transformers (c. 5 m in height) with associated electrical equipment; v. Two banded 38 / 20 kV power transformers (c. 5 m in height) with associated electrical equipment; vi. Three banded 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); vili. One new 110 kV double circuit overhead line (OHL) angle mast (c. 17m 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. 510m of OHL conductor); xii. 110 kV underground cabling between the 110 kV GIS building and the new line / cable interface end masts; xili. 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

Comments:

An AA screening and EIA screening were assessed as part of this review.

The AA screening concludes that there are no annex habitats within the footprint of the proposal. The author goes on to conclude as follows;

“The Proposed Development is not likely to either directly or indirectly significantly affect the Qualifying interests or Conservation Objectives of the European sites considered in this assessment. The Proposed Development, either alone or in combination with other plans or projects, is not likely to have significant effects on a European site. It is possible to conclude that significant effects can be excluded at the screening stage. This finding is considered accurate”.

However, the phase 2 component of the Eli Lilly construction project (planning ref: 2461160) was considered to require 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 multiple other proposals in the area the need for full AA based on potential cumulative impacts may well require consideration.

Furthermore, while the installation of the new pylons/masts are located outside the meadow barley protection area, there are existent poles that will likely require removal. This would mean there are works within an area designated as protected for an FPO species under a separate planning permission. This may give rise to complications regarding the integrity of the protected site and the [potential need for a derogation licence.

The EIA screening report screens out the need for full EIA on this proposal. This is considered an accurate conclusion with regards to ecological issues.

Recommendation:

Should the proposal be subject to grant, LCCC would recommend that the following should be set to condition;

- Any vegetation removal should include timing of works around bird nesting season and in the case of suitable trees peak bat activity season
- External lighting at substations compounds etc to be sensor controlled to prevent light spill
- Installation of bird nest boxes, bat boxes and other ecological enhancement features designed by an appropriately qualified ecologist should be implemented
- Any works in the meadow barley area must be preceded by a specialist botanical survey to assess whether there may be damage to a habitat specifically designated as a protection and translocation zone for a species listed under the floral protection order. A derogation licence should be sought if required.

Signed: Seán Doyle MSc., BSc. Hons. - Ecologist

Date: 23/01/2025