



An
Coimisiún
Pleanála

Inspector's Report ABP-322056-25.

Development	Proposed construction of a grid connection and substation to facilitate a proposed open cycle gas turbine development.
Location	In the townlands of Curraghtown, Brownstown, Navan, County Meath.
Planning Authority	Meath County Council.
Prospective Applicant	Polarisgate Ltd.
Type of Application	S.182E - Pre-application consultation.
Date of S.182E Pre-App Meeting:	19 th June 2025
Date of Site Inspection	9 th June 2025.
Inspector	A. Considine.

1.0 Introduction

- 1.1 The Commission received a request on 12th of March 2025 from prospective applicant, Polarisgate Ltd, through their agent Jennings O'Donovan & Partners Ltd, with an address at Finisklin Business Park, Sligo, to enter into pre-application consultations under Section 182E of the Planning and Development Act, 2000 (as amended) in relation to the proposed construction of a grid connection and substation to facilitate a proposed open cycle gas turbine development in the townlands of Curraghtown, Brownstown, Navan, County Meath. The proposed development comprises the development of electrical infrastructure which will facilitate the connection of the proposed 180MW gas fired peaking power plant which includes 3 no. open cycle gas turbine generators and all associated equipment and site works (Meath County Council ref Pl. ref: 24/60842 refers) to the existing national grid. This proposed development is currently on appeal with the Commission, ref ACP-323483-25 refers.
- 1.2 A pre-application consultation meeting was held between An Coimisiún Pleanála and the prospective applicant on 19th June 2025. The primary purpose of pre-application consultation was to address the issue of whether or not the proposed development constitutes strategic infrastructure for the purposes of the 2000 Act, as amended by the Planning and Development (Strategic Infrastructure) Act, 2006. This Report provides an overview of the proposed project, the relevant legislative provisions and an opinion as to whether or not the proposal is strategic infrastructure development.
- 1.3 The Commission will note that the prospective applicant has considered that the proposed development falls within Section 182A of the Act and comprises Strategic Infrastructure.
- 1.4 The Commission will note that planning permission was sought by the prospective applicant for the development of a peaking plant comprising 3 no. open cycle gas turbines (OCGT) and associated buildings and equipment, with an installed capacity of up to 180MW to the west of the subject pre-app site. It is noted that as a '*peaking plant*' the proposed development will spend most of its time on standby and will run to complement renewable power generation technology, providing flexible and

dispatchable electricity demand when renewable energy generation is low and cannot meet demand. Meath County Council issued a decision to grant planning permission for this development on 1st August 2025. This decision is currently on appeal with the Commission, ref ACP-323483-25 refers. The application noted that the applicant would make a separate planning application for the substation and grid connection to the determining authority (ACP/Meath Co. Co.) at the appropriate time.

- 1.5 A second meeting was requested and was held on 21st November 2025. The purpose of this meeting was to update Commission on the previous grid connection options and advising that the original options were no longer being pursued. The applicant also advised that the original design flexibility sought is no longer required.
- 1.6 The prospective applicant formally requested closure of the pre-application consultation process by written correspondence received by the Commission on 9th December 2025.

2.0 Site Location and Description

- 2.1 The proposed substation will be located adjacent to the site of the proposed peaking plant as described above. The proposed substation site lies partially within a greenfield site, comprising agricultural land and an area of forestry and partly within an area of the Knockharley landfill site (under the 220kV overhead lines which traverse the site from north to south). The site lies approximately 9.5km to the southeast of Navan. The proposed substation will be located immediately adjacent to the proposed peaking plant.
- 2.3 The identified site lies within an undulating landscape but at a lower elevation to the more pronounced landforms such as the Hill of Slane to the north and the Hill of Tara to the south. The site is located within the “Lowland Landscapes” Landscape Character Type as described in the Meath Landscape Character Assessment 2007 as:

'The Lowland LCT covers the largest proportion of Meath and, due to the high quality of the land, is primarily agricultural. In the south of the County, there is an abundance of 18th-century demesnes with extensive areas of mixed woodland and parkland bounded by original stonewalls, creating an attractive landscape setting for the numerous estate houses'.

- 2.4 In terms of the local Landscape Character Area, the site lies within LCA 6 - 'Central Lowlands', which is described having 'High' Landscape Value; 'Medium' Landscape Sensitivity, and; 'Regional' Landscape Importance. This LCA is described in the Meath Landscape Character Assessment 2007 as:

"Large lowland landscape area composed of rolling drumlins interspersed with numerous large estates and associated parkland. Thick wooded hedgerows, with some conifer plantations, and shelterbelts of ash and larch, separate medium to large fields. Deep roadside drainage ditches and banked hedgerows are a common feature of the landscape in the enclosed rural road corridors."

LCA 6 is noted to have *'medium potential capacity to accommodate overhead cables, substations and communication masts due to the complexity of the area, which has a variety of land uses and a robust landscape structure.'*

- 2.5 The area, while rural in character, includes the former quarry/current landfill site immediately to the east which is visible from a number of locations in the vicinity. The presence of existing electricity infrastructure, including overhead lines and associated pylons are also notable, but the presence of forestry provides some screening of these features. The site lies proximate to a number of significant transport routes including the M3, approximately 6.5km to the southwest, and the N2 approximately 1.5km to the east.
- 2.6 The wider landscape includes important archaeological and historic elements including the UNESCO site of Brú Na Bóinne approximately 7km to the northeast (including the passage tombs of Knowth, Newgrange, and Dowth, situated 6.9 km, 6.8 km, and 8.6 km northeast of the site, respectively), and the Hill of Tara

approximately 8km to the southwest. The location is very rural with only a small number of residential properties noted.

3.0 Proposed Development

- 3.1 The initial proposed development comprised the provision of a new 110/220kV gas insulated substation and either a 220kV loop connection onto the Louth – Woodland 220kV circuit adjacent to the proposed peaking power plant or the laying of underground cable between the proposed on-site substation and the existing 110kV Garballgh Substation (with three potential route options initially under consideration). It is noted that the applicant advises that EirGrid/ESB will determine the substation and grid connection voltage (110kV or 220kV) following the grant of planning permission and the submission of an application for a grid connection by the developer. The substation will be designed and installed as a permanent structure and will not be decommissioned as part of the gas fired peaking plant, subject to a grant of permission.
- 3.2 On the 16th of June, the applicant submitted their presentation for the first meeting. This presentation set out the context of the project, including details of the current application with Meath County Council and identified the options for the type of substation as well as connection options which were being explored.
- 3.3 The applicant sought a second Pre-Application meeting with the Commission on the 12th October 2025, and the meeting was convened on the 21st November 2025. The purpose of this meeting was to update Commission on the previous grid connection options and confirming that the original options were no longer being pursued. The applicant also advised that the original design flexibility sought is no longer required as the intention is to put forward the proposed 220kV Option identified in the updated documents.
- 3.4 The proposed works for the 220kV connection will involve:

- Construction of a new 12 bay, 220kV Gas insulated Substation (GIS) of circa 712m² and 15m in height surrounded by a 2.6m high palisade fence with property boundary post and rail fence.
- Approx. 600m of double circuit UGC consists of 2 No. trenches with a minimum of 2m separation distance between each circuit.
- The route includes 2 No. watercourse crossings via new culverts and 1 No. gas network crossing.
- The Proposed Development will be connected to the national grid through a loop-in/loop- out system.
- This will comprise new line cable interface masts and involve breaking the Louth-Woodland 220 kV Overhead line (OHL). The line cable interface masts will be connected to the substation through underground cable.
- The works will consist of the installation of 2 No. new mini-interface electrical compounds (each being 19.5m (w) x 29.0m (l)) and two single circuit 23m high towers.
- The entrance of the Proposed Development will be via the proposed Kentstown OCGT site entrance to the northwest of the Proposed Development on to the L10132.
- This entrance is an established access which has been safely used for years by vehicles associated with existing agricultural operations, access tracks are included with the Kentstown OCGT application.

3.5 Constraints were mapped following field work where sensitivities were identified relating to water courses, drainage, proximity to dwellings, cultural heritage, ecology, OHL / tower – Powerlines, gas lines and flood areas. At the meeting of the 21st November, the applicant also identified ongoing studies relating to the proposed development

4.0 Planning History

4.1 The following is the relevant planning history pertaining to the subject site.

PA ref: 24/60842: Permission sought for a development which will consist of a 10-year planning permission for 180-Megawatt gas fired peaking power plant on a site comprising 7.87 ha. The electricity generating station will comprise:

- 3 no. open cycle gas turbines (OCGT) generators each consisting of an air intake filter system, exhaust stack (30m high), fin fan coolers, start transformer, power control centre, fire extinguishing cabinet; and waste process water tank.
- Liquid fuel storage (secondary fuel) supply which includes; three bunded fuel storage tanks each with 1,950m³ capacity (15m diameter x 11m high).
- Unloading area, fuel polishing and transfer system building and fuel pipework.
- Three generators and step up transformers with a single storey communication building (6.7m high).
- An administration and maintenance building with an area of 800m² (9.6m high) with car parking.
- Containerised power control centre (25m by 20m x 4m high).
- Fire water tank of 500m³ and pumphouse.
- Containerised water treatment unit (12m long x 3m wide x 3m high) with 10m³ with purified water storage tank (2.75m high and 2.27m diameter).
- Lube oil and chemical storage, Emergency generator, Air compressor building (8m long x 4m wide x 4m high) and auxiliary unit transformers.
- Natural gas supply which includes; Gas Networks Ireland (GNI) above ground installation (AGI), natural gas receiving facility (5m high) including pressure and temperature control, natural gas filter and natural gas pipework.
- Temporary construction compound.

- All associated ancillary development, including upgrades to site access from the L-10132, upgrades to existing site access road, new site access road, site works and services including underground pipework and cabling, drainage infrastructure, emergency backup generator, fire detection and protection system, fencing, gates, internal roadways, lighting all other ancillary site works.

It should be noted in respect of this planning application that permission is sought for a period of 40 years. The application relates to development for the purposes of an activity requiring a license from the Environmental Protection Agency under the Industrial Emissions Directive 2012/18/EU. It also relates to a Lower Tier COMAH establishment and therefore falls under the requirements of the Control of Major Accident Hazard (COMAH) Regulations, 2015. The Planning Application will be accompanied by a Natura Impact Statement (NIS)

The Commission will note that Meath County Council sought further information on this application, and this information was submitted to the Council on the 28th of May 2025. The Council decided to grant planning permission for the development, subject to 22 no. conditions on the 1st August 2025 and this decision is currently on appeal with the Commission, **ACP-323483-25** refers.

4.2 Precedent Cases

In terms of similar, precedent cases I refer the Commission to the following:

- ABP 317901-23 – Co. Meath - the Board determined that a 220kV loop in substation to connect to Eirgrid transmission network and underground grid connection to proposed solar farm is strategic development.
- ABP 317173-23 – Co. Cork – the Board determined that a 110kV Air Insulated Switchgear (AIS) loop-in substation and associated grid connection is strategic development.
- ABP 315433-22 – Co. Kildare - the Board determined that a 220kV Air Insulated (AIS) tail fed substation with the associated grid connection

comprising 220kV underground cabling to connect into the existing 400/220kV Dunnstown substation is strategic development.

- ABP 313090-22 – Dublin 11 - the Board determined that a 220kV GIS substation on lands at Kilshane Road, Kilshane, Finglas and underground 220kV transmission line connecting to the existing Cruiserath 220kV substation is strategic development.

5.0 Prospective applicant's case

- 5.1 The prospective applicant's case is that the proposed development is strategic infrastructure as it includes a high voltage line of minimum 110kV and electric plant which will be used for conveying electricity, comprises 'transmission' and 'electric plant' in accordance with the legal definition.
- 5.2 The proposed infrastructure will directly facilitate the connection of the proposed Kentstown Open Cycle Gas Turbine peaking power plant (if granted) to the national grid. The infrastructure when constructed will be owned and managed by Eirgrid and will have capacity to accommodate additional and future renewable energy projects. It is concluded that the proposed development falls within the scope of Section 182A of the Planning and Development Act and a formal meeting with the Commission was requested.
- 5.3 Following challenges arising on the initial options put forward for the proposed grid connection, the applicant sought a second meeting to put forward an alternative option to serve the development. This option, the subject of the second pre-app meeting, proposes to comprise a proposed 220KV substation and a 220kV loop-in to the existing Louth-Woodland 220 kV overhead circuit (circa 600m). This connection comprises a new 220kV 8-bay GIS substation, a c. 600m long underground double circuit 220kV cable route, two mini-compounds and gantries to transition to overhead line and two new interface towers at the existing overhead 220kV line.

6.0 Legislative Provisions

- 6.1 Section 182A(1) of the Planning and Development Act, 2000 (as amended) requires that where a person (referred to as the 'undertaker') intends to carryout development comprising or for the purposes of electricity transmission, the undertaker shall prepare an application for approval of the development to the Commission.
- 6.2 Section 182A(9) of the Act states that 'transmission', in relation to electricity, shall be construed in accordance with section 2(1) of the Electricity Regulation Act 1999 but, for the purposes of this section, the foregoing expression, in relation to electricity, shall also be construed as meaning the transport of electricity by means of –
- (a) a high voltage line where the voltage would be 110 kilovolts or more, or
 - (b) an interconnector, whether ownership of the interconnector will be vested in the undertaker or not.
- 6.3 Section 2(1) of the Electricity Regulation Act, 1999 defines transmission as follows:
- “the transport of electricity by means of a transmission system, that is to say a system which consists, wholly or mainly, of high voltage lines and electric plant and which is used for conveying electricity from a generating station to a substation, from one generating station to another, or to or from any interconnector or to final customers but shall not include any such lines which the Board may, from time to time, with the approval of the Commission, specify as being part of the distribution system but shall include any interconnector owned by the Board.”
- 6.4 Electric plant is defined as follows:
- “any plant, apparatus or appliance used for, or for purposes connected with, the generation, transmission, distribution or supply of electricity, other than –
- (a) an electric line,
 - (b) A meter used for ascertaining the quantity of electricity supplied to any premises, or
 - (c) an electrical appliance under the control of the consumer.

5 Section 37A(1) states that an application for permission for any development specified in the Seventh Schedule shall be made to the Commission under section 37E, provided that; as per Section 37A(2) the development falls within one or more of the following:

- (a) the development would be of strategic economic or social importance to the State or the region in which it would be situate,
- (b) the development would contribute substantially to the fulfilment of any of the objectives in the National Planning Framework or in any regional spatial and economic strategy in force in respect of the area or areas in which it would be situate,
- (c) the development would have a significant effect on the area of more than one planning authority.

7.0 Assessment

7.1 The proposed development comprises the construction of a new gas-insulated substation and a connection to the grid, located adjacent to the site of the proposed peaking plant as described above in this report. Following the second meeting with the applicant, it was advised that the proposed development would be connected to the national grid through a loop-in/loop- out system. This will comprise new line cable interface masts and involve breaking the Louth-Woodland 220 kV Overhead line (OHL). The line cable interface masts will be connected to the substation through underground cable. The works will consist of the installation of 2 No. new mini-interface electrical compounds (each being 19.5m (w) x 29.0m (l)) and two single circuit 23m high towers. The configuration of the substation layout is designed to cater for Eirgrid's future expansion requirements, should it be required to make provision for future grid connections. The prospective applicant is seeking a determination from the Commission as to whether the proposal is or is not strategic infrastructure development.

- 7.2 In deciding whether or not the proposed development is or is not strategic infrastructure development, Section 2 of the Planning and Development Act, 2000 (as amended) provides interpretations except where the context requires otherwise. Strategic infrastructure development means *inter alia* (d) any proposed development referred to in Section 182A(1). Under this Section, an undertaker shall apply to the Commission for approval of a development comprising or for the purposes of energy transmission. S182A(9) states that 'transmission' shall be construed in accordance with s2(1) of the Electricity Regulation Act, 1999 and shall also be construed as meaning, *inter alia*, the transport of electricity by means of a high voltage line where the voltage would be 110kV or more. I consider that the proposed substation constitutes 'electrical plant', as defined. There is no threshold under s182A(9) of the Planning & Development Act, 2000 (as amended) in respect of a substation.
- 7.3 Transmission shall also be construed in accordance with Section 2(1) of the Electricity Regulation Act, 1999 as "the transport of electricity by means of a transmission system, that is to say a system which consists, wholly or mainly, of high voltage lines and electric plant and which is used for conveying electricity from a generating station to a substation, from one generating station to another, or to or from any interconnector or to final customers but shall not include any such lines which the Board¹ may, from time to time, with the approval of the Commission, specify as being part of the distribution system but shall include any interconnector owned by the Board."
- 7.4 The proposed substation and associated grid connection infrastructure will facilitate the connection of the proposed 180MW gas fired peaking power plant which includes 3 no. open cycle gas turbine generators and all associated equipment and site works (ACP Ref: PL17.323483 (PA. ref: 24/60842) – permitted by Meath County Council and currently on appeal to the Commission) to the national grid via a grid loop-in/loop-out connection on the Louth-Woodland 220kV

¹ The Board cited above refers to the Electricity Supply Board and the Commission refers to the Commission for Electricity Regulation. EirGrid took over the operation and development of the national grid in 2006.

overhead line. The prospective applicant has submitted that it is intended that the proposed substation and underground electrical cabling will be retained as a permanent structure on the network. However, the development of the infrastructure is dependent on the granting of permission for the proposed Kentstown OCGT.

7.5 I note the similarity between this case and other proposals put before the Commission for pre-application consultation under s182E of the Planning & Development Act, 2000 (as amended). In these cases, the Commission determined that the provision of a new 110kV substation and associated 110kV / 220kV overground/underground cabling which would connect into the existing transmission system constitutes strategic infrastructure. I consider that the current proposal is comparable, and therefore constitutes strategic development. The prospective applicant should be advised to submit any application for approval of the proposed development directly to the Commission.

7.6 In terms of matters which might influence the decision of the Board I note that there is potential for indirect effects, interactions and cumulative impacts which would be relevant to consideration in an Environmental Report and under AA Screening and/or NIS reports. A Screening report for sub-threshold EIA should also be considered.

Prescribed Bodies

7.7 In view of the scale, nature, and location of the proposed development, as described in this report, it is recommended that the prospective applicant should consult with the prescribed bodies listed in the attached appendix in respect of any application for approval.

Conclusion

7.8 I consider that the proposed development as described in the applicant's submission constitutes strategic infrastructure coming within the scope of s182A of the Planning & Development Act 2000, (as amended), therefore necessitating an application to be made directly to the Commission.

8.0 Recommendation

I recommend that Polarisgate Ltd. be informed that the proposed development consisting of the construction of a grid connection and substation to facilitate the proposed open cycle gas turbine development, in townlands of Curraghtown, Brownstown, Navan, County Meath, as set out in the plans and particulars received by An Coimisiún Pleanála on the 12th March 2025 and 13th October 2025, and in the presentation to the Commission at the Pre-Application meetings on the 19th of June and 21st November 2025, falls within the scope of section 182A of the Planning & Development Act 2000, (as amended), and that a planning application should therefore be made directly to the Commission.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.



A. Considine

Senior Planning Inspector

18th December 2025

Appendix – Prescribed bodies

The following prescribed bodies should be consulted for the purposes of SID development in accordance with the provisions of s182A(4)(b) of the Planning & Development Act, 2000 (as amended):

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

Further notifications should also be made where deemed appropriate.