



An
Bord
Pleanála

Inspector's Report ABP-322289-25

Development

Proposed development of a 110kV customer substation, a 110kV underground cable and a new 110kV strategic station including 6 number LCIMs (Line to Cable Interface Masts)

Location

in the townland of Griffinrath, Celbridge, County Kildare

Planning Authority

Kildare County Council

Type of Application

Pre-application consultation under section 182E of the Planning and Development Act 2000, as amended

Prospective Applicant

Power Capital Renewable Energy Limited

Inspector

Hugh O'Neill

1. Introduction

The Board received a request on 11th April 2025 from the prospective applicant, Power Capital Renewable Energy Limited, to enter into pre-application consultations under Section 182E of the Planning and Development Act, 2000, as amended ('2000 Act'), in relation to the proposed development of a 110kV customer substation, a 110kV underground cable and a new 110kV strategic station including 6 number LCIMs (Line to Cable Interface Masts) on lands at Griffinrath, Celbridge, County Kildare.

The primary purpose of the pre-application consultation is to address the issue of whether or not the proposed development constitutes strategic infrastructure for the purposes of the 2000 Act.

One pre-application consultation meeting was held with the prospective applicant on 23rd June 2025. A record of the meeting is on file. A letter requesting closure of the consultation process was received on the 25th June 2025.

This report provides an overview of the proposed development, as well as details of legislative provisions, and relevant precedent.

2. Site Location & Description

The proposal consists of three elements:

- a substation at the northern end of the subject site, Kilwoghan,
- a c. 1.1km cable route
- a substation to the southern end of the site, Killeenlea.

The area is characterised by large agricultural fields surrounded by strong mature hedgerows. There are a significant number of high and low voltage overhead electricity lines in the immediate and wider vicinity of the proposal.

At its closest point the proposal is approximately 400m west of the urban fringe of Celbridge as established by the recent residential development, Oldtown Woods.

The northern tail fed 110/33kV substation (Kilwoghan) is within the boundary of a consented 44 Ha solar development reg ref. 21/1256. The eastern boundary of this substation coincides with a mature hedgerow which forms a townland boundary.

The corridor for the c.1.1km proposed underground cable connecting the substations runs south from Kilwoghan substation parallel to the townland boundary. The route matches the cable route consented by planning permission reg ref: 21/1256 to and along the public road. The cable route travels southeast for c. 270m within the public road before turning southwest, onto agricultural land at the entrance to the existing Griffinrath 110kV substation. The route follows the boundary (outside) of the existing Griffinrath 110kV substation in a generally south westerly direction to the site of the proposed Killeenlea substation, crossing a water feature/stream (Liffey-150).

The site of the Killeenlea substation and interface masts is bound to the west and north by the water feature/stream (liffey-150) and associated hedgerow. Hedgerow bounds the substation to east and south which coincides with a Townland boundary. There are a concentration of overhead lines in the vicinity of this substation. There is a 220kV overhead line running east west to the immediate south of the proposed substation

The east west 110kV overhead line immediately to the north of the Killeenlea substation is connected to the existing Griffinrath substation by means of a 110kv overhead spur.

3. Proposed Development

The proposed development entails the construction of 2 substations connected by a high voltage cable.

1. To the north of the proposal a 110kV Air-Insulated (AIS) substation is proposed – ‘Kilwoghan Substation’. This substation is to be located within the solar farm granted planning permission reg ref: 21/1256 for which it will provide a grid connection point. It is proposed that this substation will also provide a point of connection for future renewable generation projects in the East Kildare region. This substation is proposed to consist of the following:
 - 1 no. single storey control building approx. 180 sq. m.
 - 1 no customer MV switchgear room
 - Primary plant electrical equipment including:
 - 1 no. 110kV transformer
 - Cable sealing ends

- Circuit breakers
 - Current transformers
 - Disconnects
 - Post insulators
 - Surge arrestors and voltage transformers
 - Steelwork and associated internal access road
2. To the south and approximately 400m southwest of the existing Griffinrath 110kV substation a new 110kV Gas Insulated Switchgear (GIS) substation – is proposed 'Killeenlea Substation'.
- A substation building approximately 60 metres long, 18.5 metres wide (1,110 sqm) and 18.6 metres high
 - 2 no. 110kV customer transformers. (reference to 220kV in the pre-planning consultation document was confirmed to be in error and should be 110kV)
3. 6 no Line to Cable Interface Masts (LCIMs) are proposed for the purpose of connecting the Killeenlea substation to the 110kV overhead line.
4. A c.1.1km Underground Cable Connection (UGC) is proposed between the proposed Kilwoghan Substation and the proposed Killeenlea Substation. The cable is to be located within agricultural land with the exception of c.270m which will be within the public road.

4. Prospective Applicant's Case

The applicant considers that the proposed development falls within the requirements of the Planning Development (Strategic Infrastructure Act 2006), and comes within the scope of section 182A of the Planning and Development Act 2000, as amended. The applicant states that the proposal also meets the criteria of Section 37A(2) of the Act as a development that would contribute substantially to the fulfilment of the relevant objectives in the National Planning Framework and the Regional Spatial and Economic Strategy for the Eastern & Midland Region.

5. Relevant Precedents

The prospective applicant cites a number of cases where the Board determined that similar development comprised SID for the purposes of s182A as follows:

ABP Ref.	Location	Development Description	Decision Date	ABP Decision
311187	Bendinstown, Gilbertstown, Kellistown West, Ballycurragh, Ardbearn, and Ballynunnery, Co. Carlow	110kV AIS single bay tail-fed substation and underground cable connection	24/11/2021	Is a Strategic Infrastructure Development
311904	Townland of Paddock, Co. Meath	Tail-fed 110kV substation and associated works	22/07/2022	Is a Strategic Infrastructure Development
311032	Townland of Fieldstown, Co. Dublin	Tail fed 110kV substation to connect to Finglas substation via 110kV underground cables	22/07/2022	Is a Strategic Infrastructure Development
318844	Belinstown, Swords, Co Dublin	110kV substation	14/11/2024	Is a Strategic Infrastructure Development
318685	Rathcoursey East and Garranekinnefeake, Co Cork	110kV AIS electricity substation (with 33kV customer compound) to connect to and serve a solar farm, associated loop-in / loop out infrastructure to connect into an existing 110kV overhead transmission line and all associated site works	09/09/2024	Is a Strategic Infrastructure Development
317297	Profile Park, Baldonnell, Co Dublin	110kV substation and grid connection	25/03/2024	Is a Strategic Infrastructure Development
320535	Walterstown, Co Meath	110/38/20 kV Loop in GIS Electrical Substation connecting into the Dunfirth-Kinnegad-Rinawade 110kV OHL	25/10/2024	Is a Strategic Infrastructure Development

6. Legislative provisions

6.1 Planning and Development Act 2000, as amended

Section 2(1) of the Planning and Development Act 2000, as amended ('2000 Act'), defines 'strategic infrastructure' as including, *inter alia*:

"any proposed development referred to in section 182A(1)"

Under subsection 182A(1) of the 2000 Act, where a person (the 'undertaker') intends to carry out development comprising or for the purposes of electricity transmission, the undertaker shall prepare, or cause to be prepared, an application for approval of the development under section 182B and shall apply to the Board for such approval accordingly.

Subsection 182A(9) states that:

"... 'transmission', in relation to electricity, shall be construed in accordance with section 2(1) of the Electricity Regulation Act 1999 but, for the purposes of this section, the foregoing expression, in relation to electricity, shall also be construed as meaning the transport of electricity by means of—

- (a) a high voltage line where the voltage would be 110 kilovolts or more, or*
- (b) an interconnector, whether ownership of the interconnector will be vested in the undertaker or not."*

Section 182E(1) provides that a prospective applicant who proposes to apply for approval under section 182B or 182D shall, before making the application, enter into consultations with the Board in relation to the proposed development.

6.2 Electricity Regulation Act 1999, as Amended

Section 2(1) of the Electricity Regulation Act 1999, as amended ('1999 Act'), sets out the following definitions:

- **'Transmission':**

"...the transport of electricity by means of a transmission system, that is to say a system which consists, wholly or mainly, of high voltage lines and electric plant and which is used for conveying electricity from a generating station to a substation, from one generating station to another, from one substation to another or to or from any interconnector or to final customers but shall not

include any such lines which the 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."

- **'Electric line':**

"...has the meaning assigned to it by section 4(1) of the ESB (Electronic Communications Networks) Act 2014."

The definition set out in s.4(1) of the 2014 Act is as follows:

"...any line which is used solely or amongst other things for carrying electricity for any purpose and as including –

(a) any support for any such line, that is to say, any structure, pole or other thing in, on, by or from which any such line may be supported, carried or suspended,

(b) any apparatus connected to or associated with any such line for the purpose of carrying electricity or electronic communications services, whether such apparatus is owned by the Board or by any company referred to in section 2 or by a company which has been provided access or services referred to in section 3, or

any wire, cable, tube, pipe or similar thing (including its casing or coating) which is used for the purpose of carrying electricity or electronic communications services and which surrounds or supports or is surrounded or supported by, or is installed in close proximity to, or is supported, carried or suspended in association with, any such line."

- **'Electric plant':**

"...any plant, apparatus or appliance used for, or for the purposes connected with, the generation, transmission, distribution or supply of electricity other than –

(a) An electric line

(b) a meter used for ascertaining the quantity of electricity supplied to any premises, or

(c) an electrical appliance under the control of a consumer"

- **‘Distribution’:**

“...the transport of electricity by means of a distribution system, that is to say, a system which consists of electric lines, electric plant, transformers and switchgear and which is used for conveying electricity to final customers”.

7. Consultation Meeting

One pre-application consultation meeting was held with the prospective applicant on the 23rd June 2025. The meeting record relating to this development proposal and the presentation made by the applicant to the Board's representatives are attached to the file.

8. Assessment

The definition of ‘strategic infrastructure’ includes development comprising or for the purposes of electricity transmission, with ‘transmission’ defined as either:

- The transport of electricity by means of a high voltage line of 110 kV or more, or an interconnector.
- The transport of electricity by means of a transmission system (a system of high voltage lines and electric plant used for conveying electricity from a generating station to a substation, from one generating station to another, from one substation to another or to or from any interconnector or to final customers, including interconnectors but excluding distribution system lines).

The development proposed entails the construction of electrical plant in the form of 2 substations and for the transport of electricity at a high voltage (110kV) between one substation and another, all of which is a system that consists of high voltage lines and electric plant used for the conveyance of electricity. The electricity is to be conveyed from one substation to another and from that substation via interface masts to an existing 110kV overhead line for the purpose of transmission. For that reason, as set out in section 2(1) of the Electricity Regulation Act, 1999, as amended the proposal forms part of the transmission system. It therefore follows that as set out in section 182A(1) of the Planning and Development Act, an application for

approval of the development shall be under section 182B and shall be made to the Board.

Conclusion

I recommend that the Board issue a determination that the proposed development of a 110kV customer substation, a 110kV underground cable and a new 110kV substation 6 number LCIMs (Line to Cable Interface Masts) in the townland of Griffinrath, Celbridge, County Kildare falls within the scope of section 182A of the 2000 Act, as amended, and that a planning application should be made directly to the Board.

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

9. Recommendation

I recommend that the prospective applicant, Power Capital Renewable Energy Limited, be informed that:

The proposed development of a 110kV customer substation, a 110kV underground cable and a new 110kV strategic station including 6 number LCIMs (Line to Cable Interface Masts) on lands in the townland of Griffinrath, Celbridge, County Kildare, as set out in the plans and particulars received by An Bord Pleanála on the 11 April 2025 falls within the scope of section 182A of the Planning and Development Act 2000, as amended, and that a planning application should therefore be made directly to the Board.

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.



Hugh O'Neill

Planning Inspector

Date: 25/06/25

Appendix 1: Prescribed Bodies

The list should reflect the site location and context but the following will provide a good baseline:

The following is a list of prescribed bodies considered relevant by the Board:

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

Further notifications should also be made, where deemed appropriate.