

An
Coimisiún
Pleanála

Inspector's Report

ABP-322298-25

Development

Proposed development of grid connection and extension to existing Drybridge 110kV substation and all associated development

Location

within the townland of Tullyallen, County Louth.

Prospective Applicant(s)

Woodsmane Ltd

Type of Application

Pre-Application Consultation under 182E of the Planning and Development Act, 2000 (as amended)

Planning Authority

Louth County Council

Date of Site Inspection

18/05/2025.

Inspector

Alan Di Lucia

1.0 Introduction

- 1.1 The Commission received a request on 9th April 2024 from Woodsmane Ltd to enter into pre-application consultations under Section 182E of the Planning and Development Act, 2000, as amended, in relation to a proposed extension to the existing Drybridge 110kV Substation and underground cable at Tullyallen, Co. Louth.
- 1.2 The Commissions Representative met with the prospective applicant and agent on the 13th June 2025. The meeting was held virtually. The applicant discussed the details of the proposed development and stated that the purpose of the proposed development is required to facilitate the development of a 120 Megawatt gas fired peaking plant to the northwest of the site. Planning Permission is expected to be lodge with Louth County Council.
- 1.3 The prospective applicant requested closure of the pre-application process on the 28th October 2025
- 1.2 This report provides an overview of the proposed development, a summary of the meeting, relevant precedents and legislative provisions and recommends that the proposed development would not constitute strategic infrastructure.

2.0 Site Location and Description

- 2.1 The proposed development is located along the old Slane Road, approximately 220m south of the National Route N51 and approximately 160m west of the M1 Motorway at Junction 10. The settlement Boundary of Drogheda is located approximately 600m to the East across the M1 Motorway and the settlement of Tullyallen is located approximately 1.5km to the northwest.
- 2.2 The proposed development comprises a greenfield site adjoining the existing Drybridge 110kV substation. Access to the existing substation is along the old Slane Road, with a separate access proposed for the proposed development adjacent to the existing access, which is currently an agricultural access to the field. The surrounding topography is generally flat, with rural houses opposite and to the west of the existing substation and a farmyard complex to the East.

3.0 Proposed Development

3.1 The proposed development is to provide an extension to the existing Drybridge 110KV Substation and proposed grid connection works which comprises an Under the Fence compound which will consist of a MV/110kV Power Transformer Unit with associated electrical primary plant components. The Total footprint area of the compound will be approximately 3380m².

3.2 The proposed extension to the existing substation is required to facilitate the development of a 120 Megawatt Gas Fired Peaking Plant to the northwest of the site. The planning for which will be submitted to Louth County Council.

3.3 The proposed development includes:

- 110kv/MV Power Transformer unit
- Cable Sealing End
- Traffo Disconnects / Earth Switch Disconnects
- Combined Current / Voltage Transformer
- Circuit Breaks
- Lightning Mast
- Post Insulators Busbar
- Modular IPP Control building to house switchgear and control panels
- Associated underground cabling will be fed from the nodule to the primary plant equipment

Additional grid compliance equipment will be sought and the substation External Civil works will require the following:

- Diversions of overhead lines
- Diversion of underground cables
- Ground and Civil Works associated with the switch yard
- Security fencing and gates works

- Compound roads and access ways
- Operational lighting.

4.0 Planning History

4.1 The following planning history relates to the development site.

Reference No.	Development Description	Decision
10/33	Alterations to existing substation	Grant

5.0 Precedent Cases

5.1 There are a material number of cases pertaining to works to existing substations which the Commission has adjudicated on to date.

The following are noted:

ABP Ref.	Development Description	Decision Date	ABP Decision
321909	Extension to existing Derryiron 110kV Substation 110kV electrical equipment associated works, Clonin, Rhode, Co. Offaly	2025	Not SID
321210	IPP Compound, including 110kv Transformer, Rathnaskillige, Ballylaneen, Co. Waterford.	2024	Not SID
320634	Extension to Derrycarney 110kV substation, Lumcloon, Cloghan,. Co. Offaly.	2024	Not SID
320205	Extension to Grange Castle 110kv substation, South Dublin County Council	2024	Not SID
316205	New line bay and associated underground cabling at Kellis 220kV substation, Co. Carlow.	2023	Not SID
315688	Modification and upgrade of the Letterkenny 110kV substation, Co. Donegal including expansion of existing compound to accommodate a new indoor GIS compound area.	2023	Not SID

314767	Upgrading of Poolbeg 220kV substation, Dublin.	2023	Not SID
314505	Upgrade of Belcamp 220kV substation Co. Dublin including new GIS building and compound extension.	2023	Not SID
314111	Upgrading of the existing Woodland 400/200kV substation including additional AIS electrical apparatus and extension to existing compound, Batterstown, Co. Meath.	2022	Not SID
313964	Redevelopment of Maynooth 220kV / 110kV substation including replacement of the existing 220/110kV AIS substation with a 220/110kV GIS substation.	2022	Not SID
311950	Modification and upgrade of the Dalton 110kV substation, Claremorris, Co. Mayo	2021	Not SID

6.0 Prospective Applicant's Case

- 6.1 No case was provided by the prospective applicant as to whether the proposed development would or would not constitute strategic infrastructure. The prospective applicant notes that the Commission is to determine whether the proposal is or is not Strategic Infrastructure Development as defined by section 182 of the Planning and Development Act 2000, as amended.

7.0 Legislative Provisions

- 7.1 Section 182A(1) of the Planning and Development Act, 2000 (as amended) requires that where a person (referred to as the 'undertaker') intends to carry out development comprising or for the purposes of electricity transmission, the undertaker shall prepare an application for approval of the development to the Commission.
- 7.2 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.

7.3 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 Commission 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 Commission.”

7.4 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.*

8.0 Pre-application Consultation

8.1 One pre-application meeting was held with the prospective applicant on the 13th June 2025. Minutes are attached to the file.

8.2 The meeting’s Chair outlined the general procedures in relation to the pre-application consultation process. The prospective applicant outlined the background to the project and provided a description of the proposed development.

8.3 Matters discussed at the meeting included:

- Once proposed development is operational, ownership will be handed to EirGrid with the exception of IPP building which will remain in applicants ownership.
- Connection between Gas Fired Peaking Plant and Substation would be at 33kV, increasing the output at the substation to 110kV.
- Prospective applicant satisfied that the Gas Fired Peaking Plant was not considered to constitute SID and that no pre application consultation with the Commission was undertaken.
- Prospective applicant confirmed that the Peaking Power Plant would not be able to operate without the existing substation infrastructure.

9.0 Assessment

- 9.1 Having regard to the details submitted with the pre-application consultation request and the clarifications discussed at the pre-application meeting, I consider that there is adequate information available to the Commission to make a determination on this request
- 9.2 The proposed development is to provide an extension to the existing Drybridge 110KV Substation which will consist of a MV/110kV Power Transformer Unit with associated electrical primary plant components. The proposed extension to the existing substation is required to facilitate the development of a 120 Megawatt Gas Fired Peaking Plant to the northwest of the site.
- 9.3 As noted above, 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).

Based on this statutory definition and the information contained in the prospective applicant's request, I am satisfied that the existing Drybridge 110kV electrical substation can be regarded as part of the electricity transmission system for the purposes of the 2000 Act. In this regard, I also note that the substation is identified on the Transmission System map provided on the EirGrid website¹.

9.4 The proposed development comprises an extension to and provision of additional infrastructure to an established and operational substation. The Commission will note previous decisions it has made on SI pre application consultation requests in relation to amendments, additions and expansion of electricity substation infrastructure. It concluded that, notwithstanding the fact that the works represent infrastructural improvement to existing 110kV (or higher) rated substations on the transmission system, that the provisions of Section 182A were not applicable.

9.5 In the instant case I note:

- The existing Drybridge 110kV substation is on the transmission network.
- The Proposal is an extension to the existing Drybridge 110kV substation.
- Although the proposed development, comprising of an extension to facilitate new line bays represents additional infrastructure and plant, it would not give rise to any fundamental or material change in the function, operation or purpose of the existing substation which will remain a 110kV substation.
- A Grid Connection is not part of this Pre-App Consultation.
- Grid Connection between proposed Gas Fired Peaking Plant and Substation would be at 33kV, increasing the output at the substation to 110kV. The connection will form part of the planning application for the Gas Fired Peaking Plant to the Planning Authority
- The proposed Gas Fired Peaking Power Plant would not be able to operate without the existing substation infrastructure
- In previous decisions on SID pre-application consultation requests in relation to electricity transmission infrastructure under Section 182E involving

¹ [001 - All Ireland \(eirgrid.ie\)](http://001-All-Ireland.eirgrid.ie)


amendments, additions and expansion of electricity infrastructure, including extensions to existing substations not within the footprint of the existing substation. The Commission concluded that the development did not fall within the scope of Section 182A of the 2000 Act, as amended.

9.6 Having regard to the nature and scale of the proposed development, the fact that it relates to an extension to an existing substation and noting previous determinations by the Commission in respect of similar requests for pre-application consultation. I conclude that the proposed development would not fall within the scope of section 182A of the Planning and Development Act 2000, as amended, necessitating the making of an application directly to the Commission.

10.0 Recommendation

I recommend that the prospective applicant, Woodsmane Ltd, be informed that the proposed extension of the existing Drybridge 110kV substation and grid connection located at Tullyallen, Co. Louth, as set out in the plans and particulars received by An Bord Pleanála on the 9th April 2025, does not fall within the scope of section 182A of the Planning and Development Act, 2000, as amended, and that a planning application should be made in the first instance to the relevant planning authority, Louth County Council

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.



Alan Di Lucia

Senior Planning Inspector

11/11/25 November 2025