

An
Coimisiún
Pleanála

Inspector's Report ACP-324312-26

Development

Electricity-transformer compound with underground cable connection to the permitted Friarstown solar farm and an 'under the fence' cable connection to the permitted Moanalow substation

Location

Lands at Friarstown townland,
Palatine, County Carlow

Local Authority

Carlow County Council

Type of Application

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

Date of Site Inspection

23rd June 2026

Inspector

Colm McLoughlin

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1.0 Introduction

- 1.1. On the 26th day of May, 2026, the Commission received a request on behalf of Eglin Energy Services Ltd. to enter into pre-application consultations under section 182E of the Planning and Development Act 2000, as amended (hereinafter 'the Act of 2000'), in relation to a development consisting of the construction of an electricity-equipment compound featuring a 33 kilovolt (kV) / 110kV step-up transformer served by a 33kV underground cable connection from a permitted solar farm, connecting by way of a 110kV 'under the fence' cable to a permitted electrical substation on lands in rural north County Carlow.
- 1.2. A pre-application consultation meeting was not held between representatives of the Commission and the prospective applicant in relation to this case. Correspondence requesting closure of the consultation process was received by the Commission on the 25th day of June, 2026.

2.0 Site Location and Description

- 2.1. The subject site of this pre-application request is located in the townland of Friarstown, approximately 2km southwest of the village of Grange / Killerig, and equidistant from the towns of Carlow and Tullow. It features agricultural land, most recently used for tillage, in an area subject of recent planning permissions to construct adjoining solar farms and connect the electrical power generated from these solar farms to the national electricity network. The site of this pre-application request is not presently served by a direct connection onto the public road network. Agricultural tracks from the north off the R726 regional road, from the east off the L-6113 local road and from the south off the R725 regional road provide access to the immediate fields surrounding the subject site of this request. The wider rural area features a gently-undulating, patchwork pattern of expansive agricultural fields, separated by mature trees and hedgerows, and traversed by a network of roads connecting between rural villages, farmsteads and one-off houses.

3.0 Proposed Development

3.1. The development subject of this pre-application consultation request would comprise an electrical-equipment compound with the following elements proposed:

- a 33kV / 110kV step-up transformer;
- a 33kV underground cable connection from Friarstown solar farm;
- a 110kV 'under the fence' cable connection to the 110kV Moanalow electrical substation.

3.2. According to the prospective applicant, the proposed electrical-equipment compound would be operated by an independent-power producer (IPP), with the medium-voltage, electrical power generated from the Friarstown solar farm that is permitted under Carlow County Council (CCC) reference (ref.) 22/149, stepped-up to 110kV within the proposed compound and connected into the Moanalow electrical substation that was permitted by An Coimisiún Pleanála (ACP) under ref. VA01.322690.

3.3. The request is accompanied by a cover letter prepared by the prospective applicant's agent, including an appended site location map and a proposed site layout plan.

4.0 Planning History

4.1. Surrounding Area

4.1.1. As mentioned above, there is an extensive planning history associated with the immediate area to the site, primarily relating to solar farm developments and the associated electrical infrastructure to enable the electrical power harnessed by these solar farms to be exported to the national grid. The following planning applications are the most recent applications relating to solar farms and electrical infrastructure in the area immediate to the subject site:

Solar Farms

- ACP ref. 309987-21 / CCC ref. 21/23 – a first-party appeal was lodged in April 2021 and in October 2021 the Commission granted a ten-year permission for

a 66ha solar farm with a 30-year lifespan and a 38kV electrical substation on lands in the townlands of Grangeford Old and Friarstown, which includes the area subject of this pre-application request;

- CCC ref. 22/149 – in June 2023 the Planning Authority granted a ten-year permission for a 69ha solar farm with a 35-year lifespan, a 38kV electrical substation and a battery-energy storage system (BESS) in the townlands of Ardenhue and Friarstown, on lands adjoining the northern side of the area subject of this pre-application request;
- ACP ref. PL01.318475-23 / CCC ref. 23/92 – a third-party appeal was lodged in November 2023 and in June 2024 the Commission granted a ten-year permission for a 77ha solar farm with a 35-year lifespan, a 38kV electrical substation and a BESS in the townlands of Baungephlure and Friarstown on lands approximately 130m to the northeast of the area subject of this pre-application request;
- CCC ref. 23/60297 – in August 2024 the Planning Authority granted a ten-year permission for a 91ha solar farm with a 35-year lifespan, a 38kV electrical substation and a BESS, in the townlands of Grangeford Old and Friarstown on lands that were previously the subject of the aforementioned permission granted by ACP under ref. 309987-21.

Electrical Infrastructure

- ACP ref. VC01.319470-24 - in February 2025 the Commission determined that a 110kV substation located at Grangeford Old and Friarstown townlands in County Carlow and a 110kV underground cable connecting this substation to the existing 220kV Kellistown substation located approximately 3.4km to the south of the proposed substation site, is a strategic infrastructure development coming within the scope of section 182A of the Act of 2000;
- ACP ref. VA01.322690-25 - in December 2025 the Commission granted a ten-year permission for a 110kV electrical substation at Friarstown townland to feature an 8km-long, 110kV underground grid connection from the proposed substation to the existing Kellistown 220kV substation. The development would also feature upgraded roads to serve vehicular access to the substation.

4.2. Relevant Precedents

- 4.2.1. The following table sets out a selection of the most recent determinations by the Commission relating to requests for pre-application consultations under section 182E of the Act of 2000 for developments of a similar nature to that presented in this pre-application case. The table also confirms whether or not the Commission considered these proposals to conform with the statutory definition of a strategic infrastructure development (SID). For reasons of conciseness, this is not an exhaustive list and I also note the cases referenced by the prospective applicant in their pre-application request correspondence.

ACP ref.	Development Description	Decision Date	Decision
322298	Extension to Drybridge 110kV substation and 'under the fence' connection to medium voltage 110kV power transformer unit near Tullyallen and Drogheda in County Louth.	2025	Not SID
321909	Extension to the existing Derryiron 110kV Substation, 110kV electrical equipment and associated works at Clonin, Rhode, County Offaly.	2025	Not SID
321210	IPP Compound, including a 110kV transformer, at Rathnaskillige, Ballylaneen, County Waterford.	2024	Not SID
321201	'Under the fence' transformer compound at Maynooth 220kV substation, County Kildare.	2024	Not SID
320634	Extension to Derrycarney 110kV substation at Lumcloon, Cloghan, County Offaly.	2024	Not SID
320205	Extension to Grange Castle 110kV substation in south County Dublin.	2024	Not SID
320197	Transformer compound and 110kV 'over the fence' connection to the adjacent Drumline 110kV substation located north of Shannon in County Clare.	2024	Not SID

319398	Transformer compound to connect with the permitted Tuam Energy Park (solar farm) adjacent to the existing Cloon 110kV substation in County Galway.	2024	Not SID
319395	Compound enclosing a 110kV electricity transformer and an electrical-control building, with 30m of underground connecting cables in Ballyragget, County Kilkenny.	2024	Not SID
316205	New line bay and associated underground cabling at Kellis 220kV substation in County Carlow.	2023	Not SID
315688	Modification and upgrade of the Letterkenny 110kV substation in County Donegal, including expansion of the existing compound to accommodate an internal gas-insulated switchgear (GIS) compound.	2023	Not SID

5.0 Legislative Context

5.1. The Act of 2000

5.1.1. Section 2(1) of the Act of 2000 defines 'strategic infrastructure development' as including, inter alia, any proposed development referred to in section 182A(1) addressing electricity transmission lines.

5.1.2. Under section 182A(1) of the Act of 2000, 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 Commission for such approval.

5.1.3. Section 182A(9) of the Act of 2000 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.'

5.2. Electricity Regulation Act 1999, as amended

5.2.1. The following relevant definitions are set out in section 2(1) of the Electricity Regulation Act 1999, as amended:

'transmission'- 'in relation to electricity, means 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.'

'distribution' is defined as 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 switch gear and which is used for conveying electricity to final customers.'

'electric plant' – 'means 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.'

'electric line' – 'means 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, and

(c) 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.'

6.0 Prospective Applicant's Case

6.1. The prospective applicant sets out that the transformer compound and associated underground cables subject of this request would facilitate a connection from a permitted solar farm (CCC ref. 22/149) to the national grid at a permitted 110kV substation (ACP ref. VA01.322690). In their request submission the prospective applicant states that the subject development does not constitute strategic infrastructure under the provisions of section 182A of the Act of 2000, as it does not form part of the electricity transmission network at the permitted Moanalow substation (ACP ref. VA01.322690). The IPP 'step-up' transformer compound and the associated 'under the fence' cable connection would allow the solar farm to export the power generated from the solar farm to the national grid. According to the prospective applicant, the equipment and infrastructure detailed in their request would not function as part of the grid or form a new node in the transmission grid. When operational, the permitted Moanalow substation (ACP ref. VA01.322690) would form a node on the national grid and the function or nature of this substation would not be altered as a result of the adjoining and connecting electrical equipment subject of this pre-application request.

7.0 Assessment

7.1. Having regard to the details submitted with the pre-application consultation request, I consider that there is adequate information available to the Commission to make a determination on this request. The legislative definition of 'strategic infrastructure' is detailed in section 5 of my report above.

- 7.2. The area surrounding the subject site of this request features permissions to allow erection of approximately 237ha of solar photovoltaic panels (under CCC ref. 22/149, ACP ref. PL01.318475-23 and CCC ref. 23/60297). It is the prospective applicant's intention for the electrical facility subject of this request to serve a solar farm that was permitted for a ten-year period by the Planning Authority in June of 2023 (CCC ref. 22/149).
- 7.3. For the permitted solar farm (CCC ref. 22/149) to operate it would need to transmit the electrical power generated to the national grid. Electricity would be transmitted at a power level of 33kV from the permitted solar farm (CCC ref. 22/149) and within the IPP-operated transformer compound this electricity would be stepped up to a power level of 110kV to allow the electricity to be transmitted via an underground 110kV electrical line to the adjoining permitted Moanalow substation (ACP ref. VA01.322690-25). This is the point in the system that the power generated by the permitted solar farm (CCC ref. 22/149) would enter the transmission system and as noted in the application to the Commission for the Moanalow substation (ACP ref. VA01.322690-25), this substation would form a node on the national electricity transmission system, featuring a compound area to be operated by EirGrid / ESB Networks.
- 7.4. In effect, the proposed development would entail an extension of the electrical infrastructure and equipment in the permitted Moanalow substation (ACP ref. VA01.322690-25). It would not function as part of the operation of the electrical transmission network. Furthermore, the development subject of this pre-application request would not give rise to any fundamental or material change in the function, operation or purpose of the permitted Moanalow substation (ACP ref. VA01.322690-25), which would in future be capable of operating as a 110kV substation.
- 7.5. Since 2022 this type of electrical facility and infrastructure has consistently been deemed by An Coimisiún Pleanála not to conform to the definition of strategic infrastructure development, including the various cases referenced in section 4 of my report, for example, ACP refs. 322298-25, 321210-24 and 320197-24. For similar reasons the prospective applicant considers that the proposed development would not conform to the definition of a strategic infrastructure development, noting in their request correspondence that an application for approval under section 182A of the Act of 2000 would not need to be made to the Commission.

- 7.6. In conclusion, I am satisfied that having regard to the nature and scale of the proposed development, the fact that it relates to an extension to a permitted substation (ACP ref. VA01.322690-25) and noting recent previous determinations by the Commission in respect of similar requests for pre-application consultation, the proposed development would not fall within the scope of the provision of section 182A of the Act of 2000 and does not constitute a strategic infrastructure development.

8.0 Recommendation

- 8.1. I recommend that the prospective applicant, Elgin Energy Services Ltd., be informed that the proposed development consisting of the construction of an electrical-transformer compound with a 33 kilovolt underground cable connection to the permitted Friarstown solar photovoltaic farm (Carlow County Council reference 22/149) and a 110 kilovolt 'under the fence' cable connection to the adjoining permitted Moanalow electrical substation (An Coimisiún Pleanála reference VA01.322690-25) in Friarstown townland, Palatine, County Carlow, as set out in the plans and particulars received by An Coimisiún Pleanála on the 26th day of May, 2026, does not fall within the scope of section 182A of the Planning and Development Act 2000, as amended, and that a planning application for this development should be made in the first instance to the relevant planning authority; Carlow County Council.
- 8.2. 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.



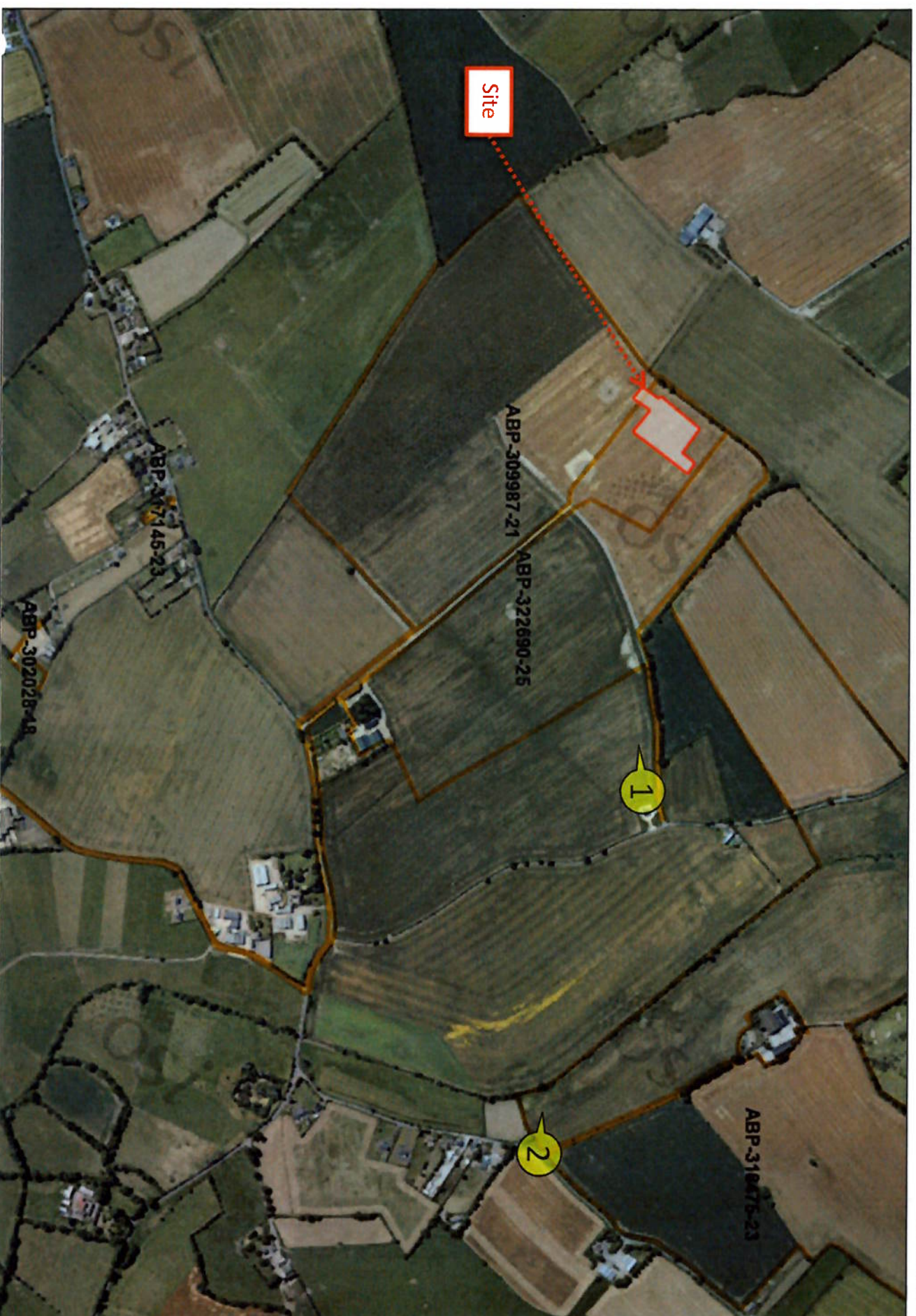
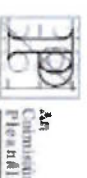
Colm McLoughlin
Senior Planning Inspector

29th June 2026

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Locations of Photographs



View 1. Panoramic view west towards the site along an agricultural access road



View 2. View northwest towards the site

