



An Coimisiún Pleanála
Strategic Infrastructure Development
64 Marlborough Street
Dublin 1

Our ref: 251041

Your ref: n/a

16th June 2026

Re: Proposed Development of a 110 / 33 kV transformer compound and 110kV under the fence cable connection to the existing Trien 110kV substation at Trienearagh, Co. Kerry - Strategic Infrastructure Development Pre-Application Consultation Request – Section 182A/182E

Dear Sir/Madam,

MKO, on behalf of our client, Circal Trienearagh Solar Limited ('the Applicant') (Unit 404, Q-House, 76 Furze Road, Sandyford Business Park, Dublin 18), are seeking a determination from An Coimisiún Pleanála (ACP) in relation to the Strategic Infrastructure Development ('SID') status or otherwise of a Proposed Development, comprising of a transformer compound and 110kV under the fence connection to the adjacent existing Trien 110kV substation, and all associated infrastructure. Please note that a solar farm application will also be submitted as part of this planning application to Kerry County Council.

The transformer compound and 110kV under the fence connection (the Proposed Development) will facilitate the connection of the proposed Circal Trienearagh Solar Farm to the existing 110kV Trien substation at Trienearagh, Co. Kerry, located in an adjacent field and operated by EirGrid.

The Proposed Development will provide grid stability and grid support services to the national electricity grid. This request provides ACP with information relating to the Proposed Development, the prospective applicant, the proposed site location, planning policy context and finally an assessment of the proposal against the SID legislative criteria.

The Proposed Development

The proposed compound, Modular Buildings, High and Medium Voltage Equipment, ancillary equipment and associated cabling are for the purpose of enabling the connection of the future Circal Trienearagh Solar Farm to the national grid, by allowing power to be exported onto the grid network. The compound would generate as an Independent Power Producer (IPP) facility which would be linked by underground cabling to the proposed Circal Trienearagh Solar Farm for which consent will be sought from Kerry County Council. The medium voltage (MV) power generated by the solar farm would be 'stepped up' to 110kV in order to connect to the adjacent substation. The connection would remove the requirement to construct a new 110kV customer substation for connection of the solar farm to the national grid.

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The compound would include two control module structures, a 110kV transformer with associated equipment, security fencing, 110kV underground cabling and 33kV underground cabling associated with the solar fields. The structures would house the switch gear and other electrical control equipment. Please see Figure 1,2 & 3 enclosed.

If it is determined that the Proposed Development is not SID by ACP, the solar PV farm, interconnecting underground cabling between it and the transformer compound and all associated infrastructure would also form part of the Section 34 planning application to Kerry County Council. The solar PV farm infrastructure does not comprise the Proposed Development that form this pre-application request.

The full list of components associated with the Proposed Development is detailed in Table 1 below.

Table 1: Full list of components associated with the Proposed Development

Drawing ID	Description	Equipment Type	Quantity
IPP Control Module	Modular Building containing control & protection, comms and supply cabinets	Modular Building	1
MV Switchgear Module	Modular Building containing 33 kV Medium Voltage Switchgear	Modular Building	1
Grid Transformer	110/ 33kV Power transformer	HV Switchgear	1
HT	33/ 0.4 kV Auxiliary LV power transformer	HV Switchgear	1
NER	33kV Neutral Earth Resistor	HV Switchgear	1
CB	110 kV Circuit Breaker	HV Switchgear	1
CT	110 kV Current Transformer	HV Switchgear	3
VT	110 kV Voltage Transformer	HV Switchgear	3
DT-DEM4	110 kV Disconnect/ Earth Switch	HV Switchgear	1
SA	110 kV Surge Arresters	HV Switchgear	6
CSE	110 kV Cable Sealing End	HV Switchgear	1
IKK	Interface Kiosk	Ancillary Equipment	2
LM	Lightning Mast	Ancillary Equipment	2
LC	Lighting Column	Ancillary Equipment	2
Underground Installation	Station Earth Grid		
	110 kV HV Ducting to ESB Station		
	33 kV MV Ducting to Solar Farm		
	LV Ducting from IKK to Eirgrid Control Building		

Prospective Applicant

The prospective Applicant for the Proposed Development, Circal Trienearagh Solar Limited, is an associated company with Circal Limited, which is an Irish-owned, Dublin-based company with extensive experience in the design, construction and operation of solar energy developments throughout Ireland, with projects currently under development in Counties Cork, Kerry, Limerick, and Kildare. The Applicant is engaging with all relevant landowners and is in the process of securing the relevant consents for the purposes of lodging a planning application.

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Proposed Development Location

The site of the Proposed Development is located on lands immediately west of the Trienearagh 110kV substation in a rural area approximately 4 km southeast of Listowel, Co. Kerry and approximately 6 km to the northwest of Abbeyfeale, Co. Limerick. The site and the adjacent lands, which are proposed to be used for the Trienearagh Solar Farm, consist of agricultural land with land-use in the wider landscape comprising a mix of agriculture, forestry and one-off housing.

Local Planning Policy Context

The Kerry County Development Plan (CDP) 2022-2028, was formally adopted by Local Members on the 4th July 2022 and came into effect on the 15th August 2022. The CDP aims to support the national target of 80% renewable electricity generation by 2030. With regard to infrastructure development the CDP *“supports the maintenance and upgrading of existing high voltage electrical infrastructure, and the provision of new high voltage transformer stations and new overhead transmission power lines subject to no significant adverse effects on the environment or Natura 2000 sites”*.

The CDP recognises that the development of secure and reliable electricity transmission infrastructure is a key factor for supporting economic development and County Kerry having access to secure, clean and affordable energy.

The following objectives are considered relevant to the Proposed Development at Trienearagh, Co. Kerry. Transmission Grid Policy of the CDP seeks to:

- KCDP 12-6: *“Facilitate sustainable energy infrastructure provision, so as to provide for the further physical and economic development of the County.”*
- KCDP 12-7: *“Support and facilitate the sustainable development of enhanced electricity and gas supplies, additional electricity generation capacity, and associated networks, to serve the existing and future needs of the County.”*
- KCDP 12-8: *“Ensure that the siting of electricity power lines is managed in terms of the physical and visual impact of these lines on both the natural and built environment, the conservation value of Natura 2000 sites and especially in sensitive landscape areas. When considering the siting of powerlines in these areas, consideration will be given to undergrounding or the selection of alternative routes.”*
- KCDP 12-9: *“Support the sustainable implementation of EirGrid’s Shaping Our Electricity Future roadmap (and successor programmes), subject to landscape, residential, amenity and environmental considerations.”*
- KCDP 12-10: *“Grid connection routing options should be developed to safeguard the strategic function of the national road network in accordance with Government policy by utilising available alternatives.”*
- KCDP 12-11: *“When considering the siting of powerlines all technological options including undergrounding shall be considered and it will be a priority to seek to avoid significant adverse effects on the environment including sensitive landscape areas and the ecological integrity of Natura 2000 sites and to avoid damage to Natural Heritage Areas.”*

There is therefore strong policy support at local level for the development of renewable energy projects such as that proposed.

Section 182A Discussion

We consider that the construction of the proposed transformer compound and under the fence connection to the existing Trian 110kV substation in County Kerry does not fall within the scope of Section 182A(1) of the Act, based on the reasons and considerations set out below.

For clarity, Subsection 9 of Section 182A states as follows:

“In this section ‘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.”*

For clarity, Section 2(1) of the Electricity Regulation Act 1999 defines “transmission” in relation to electricity 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, 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 is defined as:

“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*
- (c) quantity of electricity supplied to any premises, or (c) an electrical applicant under the*

control of a consumer”.

ESB (Electronic Communications Networks) Act 2014 Section 4(1) an Electric line is defined as:

“any line which is used solely or amongst other things for carrying electricity for any purposed 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 casting 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 associated with, any such line.”

The Proposed Development does not constitute strategic infrastructure under Section 182A of the Planning and Development Act 2000, as amended, as it does not form part of the transmission network. The proposed transformer compound would facilitate connection of the future Trienearagh Solar Farm to the transmission grid, but it will not function as part of the grid or become a new node in the transmission grid. The term ‘Transformer Compound’ is used to distinguish it from larger scale electrical infrastructure in substations which do act as nodes in the national grid.

Section 37A Discussion

Section 37A of the Act sets out the jurisdiction of An Coimisiún Pleanála in relation to Strategic Infrastructure Developments and sets out the steps ACP must take if they determine an application is Strategic Infrastructure Development. Section 37A states –

‘(1) An application for permission for any development specified in the Seventh Schedule (inserted by the Planning and Development (Strategic Infrastructure) Act 2006) shall, if the following condition is satisfied, be made to the Board under section 37E and not to a planning authority.

(2) That condition is that, following consultations under section 37B, the Board serves on the prospective applicant a notice in writing under that section stating that, in the opinion of the Board, the proposed development would, if carried out, fall within one or more of the following paragraphs, namely—

(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 Spatial Strategy or in any regional planning guidelines 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.’

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The Proposed Development would not be of a scale to justify being considered of strategic economic or social importance to the State of Region and, though it would be consistent with the objectives of the National Planning Framework, Climate Action Plan, and the Southern regional Spatial & Economic Strategy, it would not be critical to the fulfilment of those objectives. The application site is located in County Kerry, and it will not have any significant effect on adjacent planning authorities.

MKO therefore requests on behalf of the applicant to enter into pre-application consultation with ACP to formally determine if the proposed transformer compound and associated under the fence connection to the adjacent Trienearagh substation falls outside the scope of Section 182A of the Act.

Relevant Precedent

There are a number of determinations made by An Coimisiún Pleanála determining that similar developments do not fall within the scope of Section 182A. These precedents are set out in Table 2 below.

Table 2: An Coimisiún Pleanála precedent cases.

ACP Ref. No.	County	Development Description	Decision Date	Decision
321201	Kildare	Transformer Compound	10/12/2024	Not SID
320197-24	Clare	Transformer Compound	06/11/2024	Not SID
319398-24	Galway	Transformer Compound	22/07/2024	Not SID
319395-24	Kilkenny	Transformer Compound	16/07/2024	Not SID
319157-24	Donegal	Transformer Compound	28/05/2024	Not SID
318491-23	Kerry	Transformer Compound	27/03/2024	Not SID
316369-23	Limerick	Generator Transformer Compound	14/06/2023	Not SID
315827-23	Galway	Step Up Transformer & Grid Connection	01/06/2023	Not SID
314400-22	Sligo	38kV to 110kV Step Up Transformer	01/11/2022	Not SID
312013-21	Longford	Transformer Compound	15/02/2022	Not SID

Conclusion

The Proposed Development will directly facilitate the connection of the future Trienereagh Solar Farm to the national grid. It is submitted that the transformer compound should not fall within the scope of Section 182A(1) of the Act, having regard to the reasons and considerations set out above. However, due to the fact that the proposed underground cable carries a voltage of 110kV, a determination from ACP is sought, as to whether or not this falls within the scope of Section 182A(1) of the Act.

In support of this request, we are enclosing for your convenience the following details:

- Figure 1: Site location map (Scale 1:25,000)
- Figure 2: Site location map (Scale 1:2,500)
- Figure 3: Indicative Site Layout (Scale 1:500)

It is important that our client makes the planning application to the appropriate competent authority to ensure compliance with due process. Should ACP wish to facilitate a meeting to discuss the details of this case, we would request that such meeting is held via electronic mean at the earliest convenience of ACP.

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The statutory fee of €4,500 has been paid by our clients by Electronic Funds Transfer to ACP for the determination of this case. We understand that €3,500 may be refunded if no pre-application consultation is held or if no more than one meeting with ACP is required.

We trust the above is in order and look forward to hearing from ACP further in due course.

Yours sincerely,



Evelina Sadauskaite
Project Planner
MKO

Email: esadauskaite@mkoireland.ie

Enclosed –

- **Figure 1: Site location map (Scale 1:25,000)**
- **Figure 2: Site location map (Scale 1:2,500)**
- **Figure 3: Indicative Site Layout (Scale 1:500)**
- **Proof of Payment**

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