Ground Floor – Unit 3
Bracken Business Park
Bracken Road
Sandyford, Dublin 18
D18 V32Y

Unit 423
1 Horgan's Quay
Waterfront Square
Cork
T23 PPT8

Office 10, First Floor
The Junction, Unit 25J,
Axis Business Park
Tullamore, Offaly
R35 P285

Unit 233, Airport House,
Shannon Free Zone
West
Shannon, Clare,
V14 E370

MALONE O'REGAN
ENVIRONMENTAL

19th August 2026

The Secretary,
Strategic Infrastructure Section,
An Coimisiún Pleanála
64 Marlborough St,
Dublin 1.

MOR Environmental Ref: E2590

Applicant: JCO Limited

Re: Section 182E Pre-application Consultation Request for a Proposed Development of a 110kV substation and 110kV Underground Cable at Mullanafawnia, Co. Offaly

Dear Sir/Madam,

We, Malone O'Regan Environmental ('MOR Environmental'), act on behalf of JCO Limited ('the Applicant'), who wish to apply for a Section 182E Pre-application Consultation Request for the construction and operation of a development that will comprise:

- Construction of a new 110kV substation ('Proposed Mullanfawnia 110kV Substation'); and,
- Construction of a 110kV underground cable ('Proposed 110kV UGC').

Henceforth, the Proposed Mullanfawnia 110kV Substation and the Proposed 110kV UGC will be noted as 'the Proposed Development'.

The Proposed Development will be developed and constructed by JCO Limited for the purpose of enabling the transmission of electricity generated by the permitted solar PV developments under Planning Ref. 20/476, 21/227 and 22/368 via the Proposed 110kV UGC to the Permitted Freagh Substation, located ca. 6.5km northeast of the permitted solar PV developments.

Precedent

A pre-consultation request was submitted by Summit Solar in 2021 (ABP 311176-21). Please note that JCO Limited is a joint venture between Nordic Solar and Summit Solar Limited.

ACP determined on 26th October 2021 that a proposed development comprising a 110kV looped in substation, a 110kV extendable substation and 110kV underground cable connecting two permitted solar development sites, fell within the scope of section 182A of the Planning and Development Act 2000, as amended. It was concluded that the planning application should be made directly to ACP.

This determination is directly relevant to the Proposed Development, as it comprises a 110kV substation together with associated 110kV electricity transmission infrastructure required to facilitate the connection of renewable energy generation to the national electricity transmission network.

In both cases, the primary purpose of the infrastructure is to facilitate the export of electricity generated by permitted renewable energy developments via the national transmission network. The scale, function and purpose of the proposed transmission infrastructure are therefore materially comparable to those considered by ACP in ABP-311176-21.

This precedent therefore provides strong support for the conclusion that the Proposed Development should similarly be considered SID.

In order to facilitate ACP making an informed decision, we have attached the following documents and drawings in support of this pre-consultation application:

- A Consultation Document for the Proposed Development that provides high-level details about the Proposed Development;
- Landowner Consent;
- RATH d005.2.0 110kV Site Overview
- RATH d005.2.1 110kV Grid Route at Mullanfawnia Substation; and,
- RATH d005.2.2 110kV Grid Route at Freagh Substation

The required payment of €4,500 was made through EFT ref: 'JCO Solar Ltd' on 12th August 2026.

We respectfully request, on behalf of JCO Ltd, a Strategic Infrastructure pre-application stage consultation meeting under Section 182E of the Planning and Development Act 2000 (as amended) so that the Board can progress with this determination.

We look forward to hearing from you regarding available dates for a pre-application meeting.

Yours sincerely,

for Malone O'Regan Environmental

K. Broderick.

Kathryn Broderick

Principal Consultant