Document 01

09 February 2026

Our ref: CO5824

Planning Department
Mid and East Antrim Borough Council
80 Galgorm Road
Ballymena BT42 1AB

Dear Sir/Madam,

Re: Certificate of Lawfulness Application for Proposed Use or Development

Proposed Synchronous Condenser to be housed within a new building for the protection of plant and machinery, associated Fin Fan Coolers, underground piping and cables

Lands to the rear and north of the Main Turbine Hall, Kilroot Power Station, Station Road, Carrickfergus, BT38 7LX

Pursuant to section 170 of the Planning (Northern Ireland) Act 2011, please find enclosed an application for a Certificate of Lawfulness for a Proposed Use or Development related to the installation of a Synchronous Condenser to be housed within a new building for the protection of plant and machinery, associated Fin Fan Coolers, underground piping and cables on lands to the rear and north of the main turbine hall at Kilroot Power Station, Carrickfergus.

The following documentation is enclosed:

- Application form
- Site Location plan Scale 1:2500 (8310-0006 R2.0)
- Existing site layout drawing (8310-0002 R2.0)
- Proposed site layout drawing (8310-00023 R2.0)
- Proposed Synchronous Compensator Building (8310-0007 R3.0)
- Proposed Fin Fan Coolers (8310-0005 R2.0)

From the outset, it important to note that this proposal differs from the appeal relating to the replacement of internal plant and equipment at the power station currently under consideration by the Planning Appeals Commission (ref 2025/L0003). In that instance, a case has been made seeking to confirm that the replacement plant and machinery, along with the internal building modification works proposed to accommodate it fall outside the definition of development contained within section 23 of the Planning (Northern Ireland) Act 2011.

For the purposes of this application, it is accepted that the proposed works involved are development falling within the definition of section 23, and a Certificate of Lawfulness is being sought to confirm that the proposal is permitted development in accordance with Part 14 of the Planning (General Permitted Development) Order 2015 (the GDPO). The case made below is made without prejudice to the arguments put forward under the current planning appeal.

The Planning (General Permitted Development) Order (NI) 2015

The purpose of this application is to confirm that the proposal is permitted development in accordance with the requirements of Part 14, Class C of the GDPO relating to development by Statutory and other Undertakers, more specifically Electricity Undertakers.

Section 250(1) of the 2011 Planning Act defines an Electricity Undertaker as a holder of a license issued under Article 10(1) of the Electricity (Northern Ireland) Order 1992. As holder of such a license, the applicant, EP Kilroot, is an Electricity Undertaker for the purposes of Part 14, Class C of the GDPO.

The Systems Operator for Northern Ireland (SONI) is responsible for the operation of the electricity transmission system in Northern Ireland, also known as the grid. Its role is to ensure that power can flow safely, securely and reliably from locations where it is generated, like Kilroot power Station, to locations where it is needed both now and in the future. To achieve this, and to contribute towards meeting Northern Ireland's Climate Change targets, SONI requires the installation of infrastructure (referred to as 'System Services') to manage frequency fluctuations on the grid which occur due to increased generation from renewable energy sources.

Synchronous Condensers (sometimes referred to as Synchronous Compensators) are one type of System Services technology currently being sought by SONI to meet this requirement. It is a large machine comprising a rotating fly-wheel which is connected to the grid to provide inertia, or stability, to manage frequency fluctuations which occur due to increased generation from renewable energy sources on the electricity grid network, as set out above. This grid stabilisation role and the resultant inertia, was previously provided as a byproduct from the coal fired turbines at Kilroot Power Station and given that these are not currently operational, the Synchronous Condenser is now required. It is important to note that the Synchronous Condenser does not produce or generate any electricity, and so does not increase the generating capacity of Kilroot Power Station.

The Synchronous Condenser proposed under this application is therefore related to the transmission, distribution and supply of electricity of the undertaking (i.e. Kilroot Power Station) in accordance with the requirements of Part 14, Class C of the GDPO.

The proposed development comprises the following elements, each of which will be considered in terms of the relevant criteria contained under Part 14, Class C of the GDPO.

1. <u>New Building to Accommodate Plant and Machinery</u>

   A new building with dimensions of 44m (length) x 19m (wide) x 14m (high) is proposed to accommodate the Synchronous Condenser. As the building is located on operational land of Kilroot Power Station (the undertaking), is less than 15m high and is solely for the purpose of protecting plant and machinery, this element of the proposal meets the requirements of Part 14 Class C(g) of the GDPO.

   All plant and machinery proposed within the building (including the Synchronous Condenser) meets the requirements of Part 14, Class C(h) as it is less than 18m in height.

2. <u>Underground cables and pipework</u>

   Underground cabling is proposed to connect the Synchronous Condenser building and Fin Fan coolers to the main turbine hall for the purpose of electrical supplies and communications. Underground pipework is also required to connect the Synchronous Condenser to the Fin Fan coolers proposed for cooling of the Synchronous Condenser. These underground works are in accordance with the requirements of Part 14, Class C(a) of the GDPO.

3. <u>Fin Fan Coolers</u>

   A bank of Fin Fan coolers is required, as previously stated, to prevent overheating of the Synchronous Condenser and is integral to its operation. Measuring 26m (length) x 15m (wide) x 2.5m (high), this plant meets the requirements of Part 14, Class C1(e)(ii) as it is less than 18m in height.

The application site is located in an area currently occupied by a building used for hydrogen storage. As the proposed new building is not in an area of townscape or village character, demolition of the existing storage building is permitted under Part 33 of the GDPO. Furthermore, the proposed development is not within a site of Archaeological Interest in accordance with Part 14, Class C1(f).

Conclusion

For the reasons set out above, the proposed development meets the requirements of Part 14, Class C (a), (g) and (h) of the Planning (General Permitted Development) Oder 2015 and a Certificate of Lawfulness can be granted.

Please do not hesitate to get in touch if you require any further clarification in respect of the above.

Yours sincerely,

Gravis Planning