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The Secretary,
An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902.

6th^{xx} March 2026

Re: Request under Section 182E of the Planning and Development Act 2000, as amended, to enter consultation with An Coimisiún Pleanála regarding whether the proposed Carrickmines-Blackrock 220 kV replacement cable constitutes Strategic Infrastructure Development.

Dear Secretary,

EirGrid plc (hereafter, EirGrid), the prospective applicant, wishes to enter into consultation with An Coimisiún Pleanála (hereafter, the Commission) under Section 182E of the Planning and Development Act 2000, as amended, in relation to the replacement of an ageing 220 kV underground electricity circuit between Carrickmines and Blackrock. This work is part of the wider *Powering Up Dublin* programme to upgrade Dublin's electricity network so that it can securely carry more power - including electricity from renewable sources as the city expands.

It is requested that the Commission provides advice as to whether or not the proposed development is Strategic Infrastructure Development in accordance with the provisions of Section 182A of the Planning and Development Act 2000, as amended, or whether an application for permission should be made to the local authority for the area, namely Dún Laoghaire-Rathdown County Council who have an address at the 2 Marine Road, Dun Laoghaire, A96 AW21, in accordance with the provisions of Section 34 of the Planning and Development Act 2000, as amended.

The development and site location are described in detail in Section 2.0 and Section 3.0 of this request letter respectively.

It is EirGrid's initial consideration that the proposed development **does not** constitute Strategic Infrastructure Development, having regard to the precedent established by the Commission for such consideration - this is set out in Section 4.0. However, this is of course a matter for the Commission to conclude.

Stiúrthóirí: Brendan Tuohy Cathaoirleach, Mark Foley Príomhfheidhmeannach, an Dr Theresa Donaldson Leaschathaoirleach, Shane Brennan, Tom Coughlan, Michael Hand, Rosa M Sanz García (An Spáinn), Martin Corrigan Rúnaí na Cuideachta

Directors: Brendan Tuohy Chair, Mark Foley Chief Executive, Dr Theresa Donaldson Deputy Chair, Shane Brennan, Tom Coughlan, Michael Hand, Rosa M Sanz García (Spain), James Nyhan, Martin Corrigan Company Secretary

Uimhir Chláraithe na Cuideachta No. | Company Reg No. 338552 ~

1.0 Details of the Prospective Applicant

The following are the details of the Prospective Applicant:

Table 1: Details of the Prospective Applicant	
No.	Detail
Name	EirGrid plc,
Address	The Oval, 160 Shelbourne Road, Ballsbridge, Dublin 4, D04 FW28
Telephone	+353 (1) 677 1700
Email	info@eirgrid.ie
Website	www.eirgrid.com

The details of the named person acting on behalf of EirGrid are provided below. All correspondence should be directed to the named person.

Table 2: Details of named person acting on behalf of the Prospective Applicant	
No.	Detail
Name	Leah Kenny
Address	The Oval, 160 Shelbourne Road, Ballsbridge, Dublin 4, D04 FW28
Telephone	+353 (0)1 237 0743
Email	leah.kenny@eirgrid.com

2.0 Development Description

As part of the *Powering Up Dublin* programme, EirGrid intend to replace the existing 200 kV transmission circuit between Carrickmines and Poolbeg. The works that are the subject of this request letter relate to the southern onshore section of this circuit, between Carrickmines and Blackrock Park. The replacement of the remaining sections of the Carrickmines to Poolbeg circuit will be subject to separate consent.

The proposed works will replace of the existing 220 kV transmission circuit by underground cross-linked polyethylene cable installed primarily on an offline route. The works are largely within existing public road corridors and verges and existing utility corridors in Dún Laoghaire-Rathdown and comprise the following elements:

The development comprises the installation of one 220 kV underground cable circuit between Carrickmines 220 kV substation and Blackrock Park to replace the existing 220 kV underground circuit. The works follow an offline alignment primarily within public roads and verges and comprise the installation of a duct system in trenched formation (push-fit/spigot/socket units, typically c.12m lengths), duct proving and cleaning, cable installation and pulling, cable jointing within temporary controlled jointing areas, and testing, commissioning and energisation. Where specified by cross-section details, a cementitious bound aggregate backfill layer will be provided over the ducts. Trenchless techniques (Horizontal Directional Drilling, HDD or equivalent) will be used at constrained or sensitive crossings.

Temporary works and construction management will include prefabricated or cast joint bays/inspection chambers (spacing subject to detailed design), temporary cable-pulling worksites and drum staging areas, contractor compounds and welfare, traffic management measures (temporary lane closures, local access arrangements and diversions to be implemented under Dún Laoghaire-Rathdown County Council-Road-opening licence requirements), and a reinstatement programme to Dún Laoghaire-Rathdown County Council roads authority standards. A Construction Environmental and Waste Management Plan (including testing and appropriate reuse or licensed disposal of materials), health & safety and site security measures, and a programme to limit continuous open trench (target \leq c.200 m at any one time; typical advance c.15-40 m/day) will be implemented. All other associated and ancillary works necessary to deliver the project are included.

The need for an Environmental Impact Assessment Report (EIAR) has been screened out during the design stage of the project, however, detailed screening assessments for both Appropriate Assessment (AA) and Environmental Impact Assessment (EIA), will be submitted as part of any planning application.

An indicative route alignment of the proposed development is provided in Enclosure A.

3.0 Development Location

The suitability of multiple potential routes for the proposed substation was carefully evaluated through a Multi-Criteria Analysis (MCA) process. This evaluation considered technical feasibility, deliverability, economic factors, socio-economic impacts, and environmental considerations across several potential routes. Following the MCA, the subject route was identified as the Emerging Best Option to progress forward for further assessment and analysis.

The proposed works extend from the existing Carrickmines 220 kV substation to Blackrock Park, and are located entirely within the administrative area of Dún Laoghaire-Rathdown County Council. The alignment is predominantly contained within existing public road corridors, verges and utility strips and has been routed to avoid private third party land where practicable. The enclosed route drawings (Enclosure B) show the detailed chainage for this section.

Temporary worksites (joint bay working compounds, cable drum staging and winch locations) will be located in predominantly road space, permitted laybys or other temporary working areas subject to the requirements of Dún Laoghaire-Rathdown County Council and applicable roadopening licences.

Where constrained features are encountered (for example major road crossings, congested utility corridors or watercourse crossings), trenchless techniques such as

HDD will be used to cross those features and thereby minimise open excavation and temporary disruption. Permanent above-ground infrastructure for this section is limited to reinstated joint bay covers / inspection chamber access; no new above-ground overhead transmission lines or substations are proposed as part of the proposed works.

The proposed development site is not located within any designated European sites, however, the North Dublin Bay pNHA and the South Dublin Bay and River Tolka Estuary SPA are located approximately 2.2km from the site respectively.

There are no Protected Structures or National Monuments within the site or within the immediate vicinity of the site.

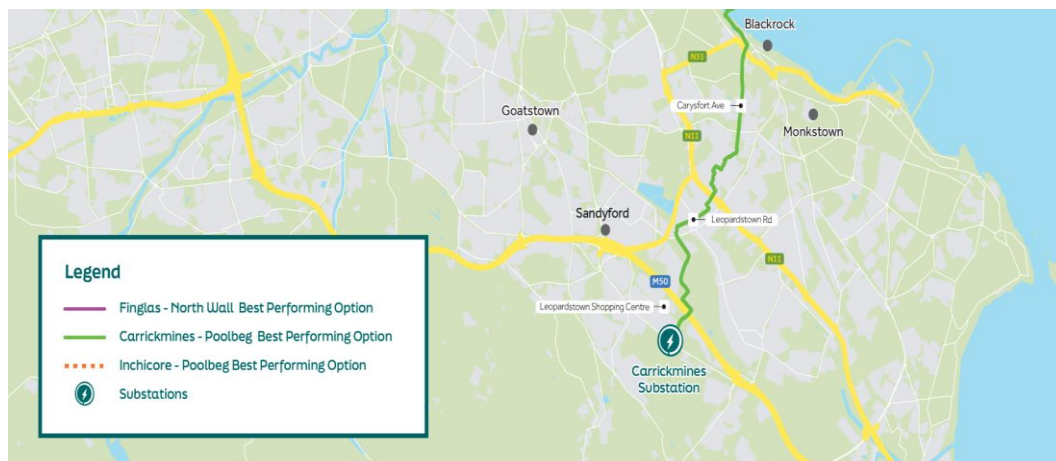


Figure 1: Indicative Site Location and Context

Source: EirGrid.

4.0 Need for the Development

Due to the ageing nature of Dublin’s electricity infrastructure, the *Powering Up Dublin* programme has been introduced by EirGrid as a means to strengthen key electricity infrastructure in Dublin and the surrounding area, making the city ‘renewable ready’.

Powering Up Dublin will see the replacement of over 50km of high-voltage cables that have been in use for almost half a century, with the associated upgrades helping to transform and modernise the city’s electricity supply. This critical programme will help Dublin grow and thrive as the demand for electricity increases in years to come.

As part of the *Powering Up Dublin* programme, the replacement of the existing 220 kV circuit has been identified as the appropriate intervention to meet local and city-wide electricity needs. The proposed underground replacement for the Carrickmines-Blackrock segment will:

- Support residential housing and commercial developments in the city centre;
- Address demand growth due to electrification of heat and transport;
- Improve the security of supply in the city centre.
- Bring renewable energy to the grid; and
- Facilitate the integration of renewable generation by removing transmission bottlenecks and increasing operational flexibility across the wider Carrickmines-Blackrock-Poolbeg corridor.

5.0 Legal Interest

EirGrid plc is the licensed Transmission System Operator for Ireland pursuant to the provisions of the Electricity Regulation Act, 1999 (as amended). Pursuant to the provisions of S.I. No. 445/2000, EirGrid plc has the exclusive function to operate and ensure the maintenance of and, if necessary, develop a safe secure, reliable electricity transmission system.

The Electricity Supply Board (ESB) is the licensed Transmission Asset Owner for Ireland pursuant to Section 14 of the Electricity Regulation Act, 1999 (as amended). The role of the ESB is to ensure that the transmission system is developed in accordance with the requirements set down by EirGrid. The proposed transmission infrastructure will be constructed by the ESB pursuant to its statutory powers. EirGrid, the prospective applicant, does not have a beneficial interest in any lands.

6.0 Statement on Strategic Infrastructure Development

EirGrid considers that, given the nature, scale and function of the proposed development on the transmission network, it *may* be considered Strategic Infrastructure Development (SID), having regard to Section 182A of the Planning and Development Act 2000, as amended, which requires that applications for development concerning electricity transmission greater than or equal to 110 kV shall be made directly to An Bord Pleanála.

The proposed work form part of the wider *Powering Up Dublin* programme which will contribute to the objectives of the National Planning Framework, the Eastern & Midland Regional Assembly Regional Spatial and Economic Strategy, and national climate and energy policy by strengthening security of supply in Dublin and enabling greater integration of renewable generation. These strategic policy considerations explain why some transmission and substation projects have previously been treated as SID.

Notwithstanding the above, and taking account the statutory test in Section 182A and the Commission's role in that determination, EirGrid's considered position in respect of the Carrickmines-Blackrock replacement works is that the proposed works should *not* be regarded as Strategic Infrastructure Development for the following principal reasons:

- The works for this section comprise a targeted underground replacement and upgrade of an existing 220 kV circuit within an established corridor. The primary activity is renewal of existing transmission capacity by installing the replacement cable.
- Permanent above-ground works associated with this section are confined to reinstated joint-bay covers/inspection access and minor inspection chambers.
- The alignment for this section lies wholly within the administrative area of Dún Laoghaire-Rathdown County Council and is routed predominantly within public roads, verges and existing utility corridors.
- The scale, permanence and functional consequence of the Carrickmines-Blackrock cable replacement align more closely with projects appropriately considered under the local authority's planning process.

The Commission has previously determined a considerable number of requests for pre-application consultation in relation to electricity transmission infrastructure under Section 182E involving amendments, additions, replacement and expansion of electricity infrastructure. Examples of such cases are summarised in **Table 1**. In these cases, the Commission has determined that such development does not fall within the scope of Section 182A of the Planning and Development Act 2000 (as amended) and consequently that planning applications should be made in the first instance to the local planning authority.

Of particular relevance to the subject proposals is the Commission's determination in relation to ABP-321655-25 which relates to the Shellybanks-Poolbeg section of the wider Carrickmines-Poolbeg circuit replacement project. In this case, the Senior Planning Inspector determined that *"the proposed replacement of existing 220kV underground cables in the vicinity of Poolbeg 220kV substation 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 Dublin City Council"*.

Table 1: Details of recent previous SID declarations by the Commission for similar works				
Ref.	County	Description of Development	Decision Date	Decision
ABP-321655-25	Dublin	Replacement of existing 220kV underground cables in the vicinity of Poolbeg 220kV substation	14/02/2025	Not SID
VC29S.314767	Dublin	Upgrading of the existing Poolbeg 200kV electrical substation	04/04/2023	Not SID
VC17.314111	Meath	Upgrading of the existing Woodland 400/200kV electrical substation.	25/08/2022	Not SID
VC19.313931	Offaly	Upgrading of the existing Derryiron 110kV electrical substation	18/07/2022	Not SID
VC09.313964	Kildare	Proposed redevelopment of the existing Maynooth 220kV/110kV electrical substation	18/07/2022	Not SID
VC16.311950	Mayo	Modification and upgrade of the Dalton 110kV substation	21/12/2021	Not SID
VC07.311253	Galway & Roscommon	Refurbishment of a 220kV circuit between Cashla 220kV Station and Flagford 220kV Station.	01/10/2021	Not SID
VC16.310830	Mayo & Galway	Uprate of the 110kV circuit between Castlebar 110kV Substation in the townland of Aghalusky Co. Mayo and Cloon 110kV Substation in the townland of Cloonascragh, Co. Galway.	01/10/2021	Not SID
VC05E.309446	Donegal	Uprating of 110kV circuit between Binbane 110kV substation and Cathaleen's Fall 110kV station Co. Donegal.	14/06/2021	Not SID
VC07.311253	Galway & Roscommon	Refurbishment of a 220kV circuit between Cashla 220kV Station and Flagford 220kV Station	01/10/2021	Not SID

Given the nature, scale and function of the proposed Carrickmines-Blackrock cable replace works, and having regard to the precedents identified, EirGrid considers that the subject proposal does not comprise Strategic Infrastructure Development as defined in Section 182A of the Planning and Development Act 2000 (as amended). EirGrid recognises that the above represents its considered position and that the ultimate legal determination whether this development is SID is a matter for the Commission. EirGrid therefore requests that the Commission advise that the Carrickmines-Blackrock cable replacement works do not constitute Strategic Infrastructure Development under Section 182A and that any application for consent for this discrete section should be made to Dún Laoghaire-Rathdown County Council under Section 34 of the Act. If the Commission is not satisfied with this position, EirGrid requests that the Commission indicate the matters it regards as determinative so that EirGrid may provide any further information the Commission requires.

5.0 Conclusion

The prospective applicant seeks the advice of the Commission in relation to whether or not the subject proposals for Carrickmines-Blackrock 220 kV replacement cable constitutes Strategic Infrastructure Development in accordance with the provisions of Section 182A of the Planning and Development Act 2000, as amended.

Given the importance of this infrastructure project, we would respectfully ask the Commission to consider this pre-application consultation request at its earliest convenience. EirGrid will ensure that appropriate personnel will be available to meet with the Commission at any time, should this be required, in order to ensure timely engagement on this project.

As is the requirement in order for this pre-application consultation request to be processed, an Electronic Fund Transfer (EFT) for the appropriate fee of €4,500.00 has been made to An Coimisiún Pleanála,

If there are any issues verifying this payment, please contact the undersigned.

Should the Commission have any queries in respect of the documentation provided, please do not hesitate to contact the undersigned.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Leah Kenny', written in a cursive style.

Leah Kenny

Senior Planner

leah.kenny@eirgrid.com

Enclosures:

- Enclosure A: Carrickmines-Blackrock- Route Alignment Overview
- Enclosure B: Carrickmines-Blackrock- Route Alignment Details - Sheets 1-5



Enclosure A

Carrickmines-Blackrock- Route Alignment Overview



Enclosure B

Carrickmines-Blackrock- Route Alignment Detail - Sheets 1 - 5