



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

26th May 2026

Re: Application for pre-planning consultation in accordance with section 287 of the Planning & Development Act 2000, as amended.

Proposed development: Belview – Great Island 38 kV underground cable river crossing in the townlands of Greatisland Co. Wexford and Drumdowney Upper and Gorteens ,Co. Kilkenny.

Prospective Developer: The Electricity Supply Board (ESB).

Dear Sir/Madam,

The ESB is seeking a pre-planning consultation with An Coimisiun Pleanála (ACP) in accordance with Section 287 of the Planning and Development Act, 2000 (as amended) [hereafter, referred to as the PDA].

A Maritime Area Consent (MAC) was issued for the proposed development on the 25th September 2025.

To facilitate this consultation, please find below a description of the proposed development, accompanied by appropriate drawings.

The statutory fee of €1,500 has been paid by way of credit card accompanying this submission.

1. Prospective Applicant/General Project Details

As per the Guidelines published on the ACP website, please note the following:

- The **planning authorities** in whose functional area the site is situated are Wexford County Council and Kilkenny County Council.
- Details of the **Maritime Area Consent** (No. MAC240021) for the marine element of the proposed development can be found in Appendix 1.

- The **prospective applicant** is the Electricity Supply Board (ESB). The registered address of the ESB is: ESB Head Office, 27 Fitzwilliam Street Lower, Dublin 2, D02KT92, Ireland.
- **The ESB Contact**, who should receive all correspondence in relation to this submission is – *Janette McDonald, Networks Planning and Consenting Team Leader, ESB Engineering & Major Projects, 6 Eastgate Ave, Castlevue, Little Island, Co. Cork, T45 YW71, Ph. 086 0840492 or email janette.mcdonald@esb.ie.*
- It is not anticipated that separate Section 287B consultations will be required in relation to the proposed development.

2. Location and Description of Proposed Development

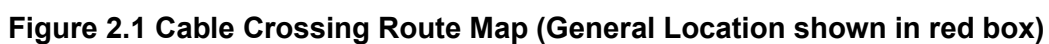
The planning authorities in whose functional area the site is situated are Wexford County Council and Kilkenny County Council.

The proposed development (see **Figure 2.1**) consists of c.5.2 km of UGC that will cross the River Barrow by means of a 'no dig method' consisting of a HDD to facilitate the connection between the two existing substations. The route of the UGC is shown in **Figures 2.1 and 2.2**, which is located on the southern outskirts of New Ross.

The route of the UGC starts at the existing Great Island 220 kV station (680000) on the east side of the Barrow River in Great Island, located on land owned by SSE. It travels west for approximately 500m where it crosses the Barrow River by HDD and into lands known as Drumdowney Upper (Kilkenny CC) on the westside of the Barrow River in Belview. The route then continues in a southwest direction within a standard 38 kV Single Circuit Trench Cross Section 5 Way Duct Formation until it ends within the existing Belview 38 kV Station (605000).

The primary land use along the route is commercial and agricultural including an active port area.

- Great Island 220 kV Station (Wexford CC), Co-ordinates: 52.281183, -6.992970
- Belview 38 kV Station (Kilkenny CC), Co-ordinates: 52.265004, -7.036314



The UGC will be placed primarily within the boundaries of privately owned grassland and roadways as described within section 2 above. The UGC will be constructed within the corridor shown on the planning application drawings, which have been environmentally assessed. The specific location of the UGC within that corridor will be determined during the detailed design stage of the project.

The UGC, approximately 5.2 km in length, will consist of the HDD crossing under the River Barrow and traditional trenching and ducting for the remainder of the proposed circuit route. The HDD crossing will consist of a 3 x 1000Al XLPE 38 kV cables installed in 140mm diameter ducting for the circuit. The traditional trenching and ducting will consist of 3x630Al 38 kV XLPE cable installed in 125mm diameter HDPE ducts.

UGC Trench Section

The ducts are buried underground in a trench with dimensions between c. 0.6m width and a depth of c. 1.220m. The ducts are surrounded by Cement Bound Granular Mixture (CBGM) to a depth of approximately 675mm. The remainder of the trench is backfilled with clause 804 material to within 100mm of the finished surface level. The finished surface will be reinstated in accordance with the requirements of WCC & KCC. Where the cable route passes through privately owned lands and greenfield areas, the surface shall be reinstated like for like either through seeding or laying of grass turf. Refer to **Figure 2.3** for photograph of typical 38 kV Circuit installation.



Figure 2.3 Typical UGC Construction

Backfill And Reinstatement As Per Specification.

Finished Surface Level

300 (MAX.)

750 (MIN.)

950 (MIN.)

1220

WARNING TAPE

Yellow Marker Warning Tape 500 mm Wide
ESB Code : 2955092

1 x Red Cable Marker Strip
400 mm Wide x 2.5 mm
ESB Code : 2955103

1 x Red Cable Marker Strip
400 mm Wide x 2.5 mm
ESB Code : 2955103

12 mm Diameter Pull Ropes in All Ducts.

Ducts Laid in CBGM B (CL 822)
Compacted to CL.813.10 and Table 8/4 of T.I.I. Specification For Roadworks (15 N/mm² after 7 days)

115 150 115

A4 A5

A2

A1 A3

190 190

600

75

110

90

65

A=110 mm: Outer Diameter HDPE ESB Approved Duct, SDR=17.6
All Dimensions in Millimetres.

Figure 2.4 Typical Cross Section 38 kV 5-Way Circuit UGC

UGC HDD Section

The ducts will be installed within a single bore of approximately 589mm in diameter and approximately 1000m in length. The drill will pass through the overburden at the launch pit on the western side of the river into the soft to firm clay layer and travel underneath the riverbed before emerging through the overburden in the reception pit on the western side of the river. The drill will pass through the clay layer below the riverbed. The depth of the drill below the riverbed will be approximately 33m and this has been determined following the completion of intrusive boreholes, laboratory testing, 2D-Resistivity (ERT) / seismic refraction (p-wave) geophysical survey of the riverbed and completion of a comprehensive conceptual design. Refer to **Figure 2.5** for profile of the proposed HDD crossing.

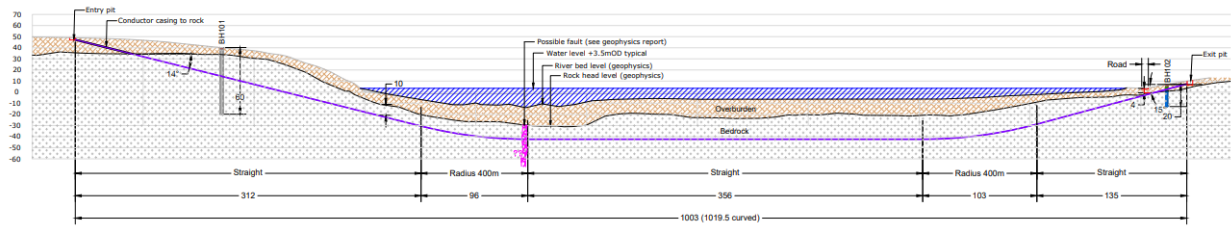


Figure 2.5 Profile of HDD under River Barrow

3. Drawings:

The following drawings have been included with this submission:

Drawing Reference	Drawing Description
PE424-D1030-005-001-000	Cable Route Sheet 1
PE424-D1030-005-002-000	Cable Route Sheet 2
PE424-D1030-007-001-000	Typical Trench Crossing 5 Way Duct Formation

4. Planning History

Development in the area is generally related to port activities and various planning applications have been made over the past number of decades related to such activities. Some recent planning applications along the route of the cable have been summarised in the table below;

Ref no.	Applicant	Development	Decision
KCC ref. 2560391 and ACP ref. 500967	Drumdowney Solar Farm Limited	10 Year Planning Permission for a solar farm with a total area of circa 189 hectares	GRANT
ACP-323575-25	Port of Waterford	Proposed extension of port facilities to support Offshore Renewable Energy ('ORE') development and ancillary works	LIVE CASE
ACP-318103-23	The Electricity Supply Board	Development of a new 38 kV electricity circuit.	GRANT
ACP-308906-20	Greenlink Interconnector Limited	Proposed development will form part of the Greenlink Interconnector and will consist of the development of a new converter station, tail station, MV substation and 23km of high voltage direct current (JVDC) electricity cables, 420m of high voltage alternating current	GRANT

		(HVAC) cables, 23.42km of fibre optic cable and all associated site works with an overall proposed development site area of 83.8ha.	
KCC 2560254	Suir Shipping Limited	Extension of the existing access road that provides access to lands located at Belview Port, Gorteens & Drumdowney Upper, Co. Kilkenny. The proposed development works will consist of the extension of the existing access service road, construct a new clear span bridge structure, ancillary service connections, landscaping and associated site works.	GRANT
KCC 2560177	South East Port Services Limited	Construction of a bulk store and associated site works. The store will be used to store port related products such as break bulk, bulk and unitised loads	GRANT
KCC 22480	Port of Waterford Company	Maintenance Building, roof mounted solar panels and associate site works at Belview Port	GRANT

5. Policy Context

5.1 National Marine Planning Framework

At the national level it is considered that the proposed project aligns with the overall Energy-Transmission, Economic and Social objectives of the National Marine Planning Framework (NMPF).

It is considered that the proposed project aligns with the following policy objectives of the NMPF:

Co-existence Policy 1 - *Proposals should demonstrate that they have considered how to optimise the use of space, including through consideration of opportunities for coexistence and co-operation with other activities, enhancing other activities where appropriate. If proposals cannot avoid significant adverse impacts (including displacement) on other activities they must, in order of preference: a) minimise significant adverse impacts, b) mitigate significant adverse impacts, or c) if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding.*

Infrastructure Policy 1 - *Appropriate land-based infrastructure which facilitates marine activity (and vice versa) should be supported. Proposals for appropriate infrastructure that facilitates the diversification or regeneration of marine industries should be supported.*

Transmission Policy 4 – *Where possible, opportunities for land-based, coastal infrastructure that is critical to and supports energy transmission should be prioritised in plans and policies. Designation of land-based zones for the purposes of co-ordination and integration with relevant Marine Plans must be considered, where appropriate.*

5.2 National Planning Framework First Revision and the National Development Plan Review 2025

Project Ireland 2040 is the overarching policy guiding the sustainable development of Ireland. This policy is comprised of the National Planning Framework (NPF) First Revision, which sets out a vision for the social and economic growth of the nation to 2040, and the National Development Plan (NDP) Review 2025, which attributes funding to projects which achieve the goals of the NPF.

The development of Ireland's electricity grid is a key part of the NPF, coming under National Strategic Outcome (NSO) 8: Transition to a Carbon Neutral and Climate Resilient Society. It is recognised within this NSO that it will be imperative that the national grid is developed and upgraded to accommodate increasing levels of demand and supply, a key element reiterated under National Policy Objective 71:

National Policy Objective 71: Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development.

The NDP sets out funding priorities for national, regional, and local projects based on the NSOs outlined in the NPF. Investment priorities for the Irish electricity grid are outlined in the NDP in Chapter 5.8. The NDP outlines that investment in grid infrastructure will enable ESB and EirGrid “to significantly increase capital investment to expand electricity transmission and distribution network infrastructure”. The importance of infrastructure development in achieving the wider goals of the NDP and NPF is outlined in Chapter 8.5 of the NDP:

“...this infrastructure is required to underpin the development of all other economic and social infrastructure we need to function as a society. It is also vital to enable the development of the 300,000 homes we need to meet the Government's housing target, and to support our economy's competitiveness.”

The proposed development supports the goals and overall direction of the NPF and NDP and will contribute to a low carbon economy, economic growth, and security of supply.

5.3 Climate Action Plan 2025

Electricity has a challenge ahead to achieve a 75% reduction in emissions by 2030, based on a 2018 baseline and its success has knock-on implications for other sectors in reaching their target. Achieving the target heavily relies on the continued deployment of renewable energy

generation and supporting electrical grid infrastructure enhancements. The plan outlines the importance of strengthening the grid to achieve the goals for the electricity sector:

“This represents an immense challenge as the sector not only has a requirement to reduce emissions, but also to meet the increasing electricity demand required for our economy, ensuring the energy security of the State, and supporting those sectors which are decarbonising through electrification.”

The Climate Action Plan 2025 (CAP25) refers to a need for improvements to grid infrastructure which will enable a renewables-led system to radically reduce emissions in the electricity sector, protect our energy security, and ensure our economic competitiveness. CAP25 signifies support for the development of electricity grid enhancements, in order to allow greater capacity on the grid to support the transition to greater renewable generation capacity. The proposed development will be in line with CAP25.

The support for the construction of new and upgrades to existing electricity grid infrastructure outlined in the CAP25, is echoed in the revised NPF and NDP. The proposed development will contribute to the direction within the national planning policies to transition to a low carbon economy while supporting national social and economic development.

5.4 The Regional Spatial & Economic Strategy for the Southern Region 2020-2032 (RSES)

The RSES primarily aims to support the delivery of the programme for change set out in Project Ireland 2040, the NPF and the NDP. The RSES identifies high-level requirements and policies for the Southern Region and establishes a broad framework for the way in which society, environment, economy and the use of land should evolve. In general, the RSES is supportive of the upgrading of electricity infrastructure in the Southern Region.

The RSES emphasises the need for the electrification of the transport sector and the increased use of renewable energy in the following Regional policy Objectives;

- RPO 87 Low carbon Energy Future
- RPO 91 Decarbonisation in the Transport Sector
- RPO 92 Electric Vehicle Infrastructure
- RPO 93 CNG & EV Infrastructure
- RPO 96 Integrating Renewable Energy Sources

Upgrading of electricity infrastructure, such as the proposed development, is crucial to ensure the capacity is available for an increased reliance on electricity and associated infrastructure.

Additionally, the RSES shows direct support for developments in electricity infrastructure in the following objectives;

RPO 219 New Energy Infrastructure

It is an objective to support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers (subject to appropriate environmental assessment and the planning process) to ensure the energy needs of future population and economic expansion within designated growth areas and across the Region can be

delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs.

RPO 222 Electricity Infrastructure

It is an objective to support the development of a safe, secure and reliable supply of electricity and to support and facilitate the development of enhanced electricity networks and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this plan under EirGrid's (2017) Grid Development Strategy (subject to appropriate environmental assessment and the planning process) to serve the existing and future needs of the Region and strengthen all-island energy infrastructure and interconnection capacity.

5.5 Wexford County Development Plan 2022-2028

The **Wexford County Development Plan 2022-2028** is the current development plan for Wexford.

The most relevant part of the CDP is Volume 10 Energy Strategy with relevant sections detailed below.

8.1 Introduction

Renewable energy developments need various types of infrastructure to facilitate transmission, distribution, storage, export and use of their product, whether it be electricity, heat or a liquid or solid fuel. The availability of such infrastructure is required to fully exploit the renewable potential. The Local Authority will support the development of such infrastructure to achieve national energy targets and realise local renewable energy potential.

Objective ES35

To facilitate the provision of and improvements to energy networks in principle, provided that it can be demonstrated that:

- The development is required in order to facilitate the provision or retention of significant economic or social infrastructure*
- The route proposed has been identified with due consideration for social, and environmental*
- The design is such that will achieve least environmental impact consistent with not incurring excessive cost*
- Where impacts are inevitable mitigation features have been included*
- Proposals for energy infrastructure should be assessed in accordance with the requirements of Article 6 of the Habitats Directive*

5.6 Kilkenny City and County Development Plan 2021-2027

The **Kilkenny City and County Development Plan 2021-2027** is the current development plan for Kilkenny.

The most relevant part of the CDP is Volume 10 Energy Strategy with relevant sections detailed below.

10.3 Energy

The availability of energy is of critical importance to facilitate new development.

10.3.1 The National Transmission/Distribution network

The existing transmission network in County Kilkenny comprises mostly 110 kilovolt (kV) circuits and one 220 kV circuit in the south of the county. There is one transmission substation within the County at Clara near Kilkenny City, which is served by two 110 kV overhead lines. The Council recognises the need to increase electrical infrastructure capacity and security.

Other new projects may arise also to facilitate electricity demand growth and the connection of new electricity generation projects.

The Council will support the development of a safe, secure and reliable supply of electricity and to support and facilitate the development of enhanced electricity networks and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this plan.

10.3.2 Grid Development Management Requirements:

Kilkenny County Council will facilitate the provision of energy networks in principle, provided that it can be demonstrated that –

- the development is required in order to facilitate the provision or retention of significant economic or social infrastructure;*
- the route proposed has been identified with due consideration for social, environmental and cultural impacts;*
- the design is such that will achieve least environmental impact;*
- the lines should be planned to avoid areas of high landscape sensitivity;*
- preference should be given to undergrounding services where appropriate;*
- the proposed infrastructure complies with all internationally recognised standards with regard to proximity to dwellings and other inhabited structures including best practice and new accepted research on the impacts on health;*
- new power lines and power installations should be sited in accordance with the requirements of the “Health Effects of Electromagnetic Fields” Report issued by the Department of Communications, Marine and Natural Resources in 2007, and*
- where impacts are inevitable, mitigation features have been included.*
- where considered necessary by the Council, a Visual Impact Assessment and a Landscape Impact Assessment will be required for significant Grid Infrastructural projects.*
- That existing grid infrastructure should be used where possible in preference to erecting new grid infrastructure.*
- Any proposed development must avoid impact on any Special Area of Conservation.*

In considering facilities of this nature that traverse a number of counties or that traverse one county in order to serve another, the Council will consider the proposal in light of the criteria outlined above.

The Council will also treat the proposal as if it were required to service a development within Kilkenny County Council.

Having regard to the above requirements, this application will be accompanied by the following reports:

- Construction Environmental Management Plan (CEMP)

This report will assist An Coimisiún Pleanála in assessing the environmental effects associated with the proposed development.

6. Environmental Considerations

Appropriate Assessment

A Natura Impact Statement (NIS) is being prepared for the proposed development and will be submitted with the planning application.

EIA Screening Assessment

ESB has considered the necessity for Environmental Impact Assessment (EIA) screening. Given the nature of the site and the characteristics of the proposed development, it was not considered necessary to produce a formal report for EIA screening, the issues considered are detailed below.

ESB has considered the provisions of Schedule 5 of the Planning and Development Regulations 2001 (as amended), and the governing European Directives – including EIA Directive (2014/52/EU). The proposed development does not fall within any of the thresholds detailed in Schedule 5.

As such, the proposed development is not a type of development to which Schedule 5 (or the governing European Directives) applies. If this is the case, then the potential requirement for sub-threshold development as detailed in Schedule 7 of the Planning and Development Regulations 2001 (as amended) does not apply, as that can only apply to a Schedule 5 development.

The Planning and Development Regulations 2001, as amended, lists project types that are subject to EIA having regard to specified thresholds.

Schedule 5 Part 1 Item 20 requires EIA for:

Construction of overhead electrical power lines with a voltage of 220 kilovolts or more and a length of more than 15 kilometres.

The proposed development involves construction of overhead electrical power lines and underground cables of c. 3.35 km with a voltage of 38 kilovolts (38 kV).

The proposed development does not therefore fall within the specified threshold and EIA is not required having regard to Schedule 5 Part 1.

Schedule 5 Part 2 Item 3 Energy Industry requires EIA for:

(b) Industrial installations for carrying gas, steam and hot water with a potential heat output of 300 megawatts or more, or transmission of electrical energy by overhead cables not included in Part 1 of this Schedule, where the voltage would be 200 kilovolts or more.

The proposed development at a voltage of 38 kV and does not therefore fall within the specified threshold and EIA is not required having regard to Schedule 5 Part 2.

Schedule 7 specifies criteria for determining whether development listed in Part 2 of Schedule 5 should be subject to an environmental impact assessment (often referred to as sub-threshold EIA).

The proposed development is not listed as a development in Part 2 of Schedule 5; therefore the provisions of Schedule 7 do not apply to the proposed development and EIA is not required having regard to Schedule 7.

Purpose of the Planning and Environmental Report (PER)

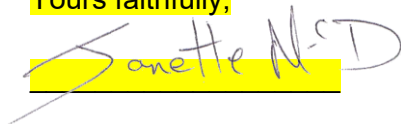
Whilst EIA is not required for the proposed development, ESB will prepare a Planning and Environmental Report (PER), focusing on the environmental topics of biodiversity, which demonstrates that the proposed development will not create significant adverse impacts on the environment and would be in accordance with the proper planning and sustainable development of the area where it is situated.

7. Conclusion

It is ESB's intention to submit an application for consent for the above-described proposed development as a matter of urgency. We respectfully request that the Commission proceed with the pre-planning consultation mandated under Section 287 of the Act so that this application can proceed.

I trust this provides all the information you require at this stage. If you have any queries please contact me on. 086 0840492. I would be grateful if all correspondence could be sent by email to janette.mcdonald@esb.ie.

Yours faithfully,



Janette McDonald

Planning and Consenting Team Leader

ATTACHMENTS

- Drawing pack
- Appendix 1 – Maritime Area Consent Map No. MAC240021