21 August 2026

Re: ESB Submission to Material Alterations to Proposed Variation No. 3 of the South Dublin County Development Plan 2022 – 2028 – City Edge Strategic Urban Regeneration Framework.

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Electricity Supply Board (ESB), 27 Lower Fitzwilliam Street, Dublin 2, welcomes this opportunity to make a submission to the Material Alterations of the Proposed Variation No. 3 of the South Dublin County Development Plan 2022 – 2028.

While this submission addresses solely the Proposed Material Alterations, it should be considered within the broader context of our prior submission (Ref: SD-C418-35) to Proposed Variation No. 3 of the South Dublin County Development Plan 2022 – 2028. ESB's detailed submission, submitted on 15th May 2026, was formally acknowledged and assigned the reference number above.

Following review of the Chief Executive's report and the response to ESB's submission, ESB notes that no change to the proposed Variation was recommended. ESB welcomes the recognition of the importance of upgrading and expanding the electricity network, and the commitment to continued collaboration with South Dublin County Council to support the timely delivery of essential electricity infrastructure. In light of the Chief Executive's report, ESB wishes to further clarify its position on the potential undergrounding of overhead high-voltage lines, as set out below.

Undergrounding Overhead Cables Feasibility Study

The City Edge Project has identified existing high-voltage overhead electricity transmission infrastructure as a significant factor influencing future development within parts of the regeneration area. Proposed Variation No. 3 addresses this issue through a structured and evidence-based approach centred on the completion of a comprehensive feasibility study.

Section 1.6.1.5 of the Strategic Urban Regeneration Framework provides for the commissioning of a feasibility study by the Land Development Agency, in collaboration with South Dublin County Council, Dublin City Council, ESB and EirGrid, to examine the potential implications, opportunities and constraints associated with the undergrounding of high-voltage overhead lines within the City Edge area. The purpose of this work is to determine whether undergrounding is technically achievable, environmentally acceptable, operationally sound and economically justified, while maintaining the safe, secure and reliable operation of the electricity transmission network.

ESB and EirGrid continue to contribute technical and operational expertise to this assessment. Work completed to date has identified a range of significant engineering, operational and cost-related challenges, including tunnelling in a complex urban environment, interactions with existing underground infrastructure, construction-related impacts and the need to maintain electricity network security and resilience throughout any potential works. While a range of engineering solutions are being examined as part of the study, including micro-tunnelling approaches, no preferred solution has been identified and further investigation, design development and assessment will be required.

In this regard, ESB's position is that any consideration of undergrounding must remain subject to the findings of the feasibility study and any subsequent technical, environmental, operational and economic

assessments. The completion of the feasibility study should not be interpreted as a commitment to undertake undergrounding works. Rather, it is intended to establish whether such works are feasible and capable of being delivered without compromising network safety, security, resilience or wider strategic electricity infrastructure requirements.

ESB welcomes the plan-led approach adopted within the Variation, which recognises both the regeneration objectives of the City Edge Project and the critical strategic role of existing electricity infrastructure. ESB also supports the retention of appropriate planning safeguards, including wayleave protection, separation distances and infrastructure protection measures, pending the outcome of the feasibility assessment and any future decisions arising from that process.

Conclusion

The successful regeneration of City Edge will require the coordinated integration of electricity infrastructure, including substations, cable routes, wayleaves and operational access, within future planning and development proposals. Where high-voltage overhead infrastructure remains in place, appropriate separation distances, safety requirements and design measures must continue to be applied. ESB supports the ongoing feasibility study into the potential undergrounding of high-voltage overhead lines; however, any future proposals will be subject to detailed technical, environmental, operational and economic assessment and must maintain system security, operational safety and long-term network resilience.

ESB remains committed to working collaboratively with South Dublin County Council and other stakeholders to support the delivery of sustainable growth in the County and would welcome the opportunity to engage further in relation to infrastructure planning, network capacity and development sequencing as the Variation is implemented.

If we can be of any further assistance, please do not hesitate in contacting the undersigned.

Yours sincerely,

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