



Our Ref.: IE000451AA

Date: 6th November 2025

The Secretary,
Strategic Infrastructure Development Unit,
An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902

AN COIMISIÚN PLEANÁLA	
LDG-	_____
ACP-	_____
06 NOV 2025	
Fee: €	0 Type: _____
Time: 14.14	Bv: Gnaor

West Pier Business Campus,
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RE: RESPONSE TO SUBMISSIONS MADE TO AN COIMISIÚN PLEANÁLA IN RELATION TO THE PROPOSED STRATEGIC INFRASTRUCTURE DEVELOPMENT PLANNING APPLICATION UNDER ACP CASE NUMBER ACP-323291-25 FOR THE CENTRAL DUBLIN SUBSTATION PROJECT.

Dear Sir/Madam,

RPS, West Pier Business Campus, Dún Laoghaire, County Dublin, A96 N6T7, is instructed by the Applicant, EirGrid plc (EirGrid) to submit this response to submissions made to An Coimisiún Pleanála (ACP) in relation to the proposed Strategic Infrastructure Development (SID) planning application under ACP Case Number ACP-323291-25 for the Central Dublin Substation Project which comprises of the construction of a new transmission substation and associated development in East Wall, Dublin 3.

A total of 9 no. submissions in relation to the SID application were received and accepted by ACP and subsequently provided to EirGrid. We refer to Appendix A of the enclosed Response Report which includes a copy of ACP's letter dated 10th October 2025, inviting EirGrid to respond to the submissions received. The enclosed Response Report sets out the Applicant's response to each of the submissions, with reference to the documentation submitted as part of the SID application, including the Planning and Environmental Constraints Report (PECR) prepared by RPS, and other supporting reports and drawings as relevant.

Should you require any further information, please do not hesitate to get in contact with the undersigned.

Yours faithfully,
for RPS


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Response to Submissions

Central Dublin Substation Project

An Coimisiún Pleanála Case Number: ACP-323291-25

Central Dublin Substation Project
Response to Submissions
F01
November 2025

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1 Introduction

RPS, West Pier Business Campus, Dún Laoghaire, County Dublin, A96 N6T7, is instructed by the Applicant, EirGrid plc (EirGrid) to submit this response to submissions made to An Coimisiún Pleanála (ACP) in relation to the proposed Strategic Infrastructure Development (SID) planning application under ACP Case Number ACP-323291-25 for the Central Dublin Substation Project which comprises of the construction of a new transmission substation and associated development in East Wall, Dublin 3.

A total of 9 no. submissions in relation to the SID application were received and accepted by ACP and subsequently provided to EirGrid. In this regard, we refer to the enclosed letter (see **Appendix A**) received from ACP, dated 10th October 2025.

Of these submissions, 4 no. were by prescribed bodies including Dublin City Council, Transport Infrastructure Ireland, Uisce Éireann and the Department of Housing, Local Government and Heritage. Another 5 no. submissions were made by local residents.

Key issues raised in the submissions relate to, *inter alia*, the following:

- Site selection and land use
- Impact on residential amenity
- Visual impact
- Landscaping, boundary treatment and site lighting
- Air, noise and vibration
- Traffic and transportation
- Health and safety
- Drainage and water supply
- Environmental Impact Assessment and Appropriate Assessment
- Property devaluation
- Community consultation and community gain

This Response Report sets out the Applicant's response to each of the submissions received, with reference to the documentation submitted as part of the SID application, including the Planning and Environmental Constraints Report (PECR) prepared by RPS, and other supporting reports and drawings as relevant.

1.1 Structure of this Response Report

This Response Report is set out as follows:

Section 1: Introduction

Section 2: Background and Need

Section 3: Site Location and Context

Section 4: Summary of Proposed Development

Section 5: Response to Submissions

Section 6: Conclusions

2 Background and Need

Due to the ageing of Dublin's electricity infrastructure, EirGrid's Powering Up Dublin Programme has been introduced as a means to strengthen key electricity infrastructure in Dublin and the surrounding area, making the city 'renewable ready'. Powering Up Dublin requires the installation of five routes for high voltage underground cables to replace older cables, as well as substation upgrades and the construction of a new electricity transmission substation in Central Dublin.

Dublin City Centre currently gets its power from existing transmission substations in Finglas, Ringsend and Inchicore. It is projected that these existing transmission stations will reach their capacity limits in the coming years. Because of this, there is a need for a centrally located substation to support Dublin's growing electricity needs.

As part of the Powering Up Dublin Programme, a new 220 kV / 110 kV Gas Insulated Substation (GIS) has been identified as the best solution to address the city's growing electricity demand. This GIS substation will be looped into one of the existing 220 kV circuits in the North Inner City. The proposed new station will support:

- Residential housing and commercial developments in the City Centre area;
- Demand growth due to electrification of heat and transport;
- Improving security of supply in the City Centre; and
- Bringing renewable energy on to the grid.

The benefits of the Project include:

Security and reliability of supply - Building a more resilient and reliable electricity grid helps ensure that everyone has power when and where they need it. This upgrade will also enable greater energy independence by using greener sources of electricity close to the city.

Sustainability - Powering Up Dublin will enable the city's grid to use the electricity generated from offshore wind energy to the heart of the city. This is a vital step towards transitioning Ireland to a low carbon electricity future.

Meet future needs - These improvements will help to meet the growing and changing electricity needs of Dublin. This includes the electrification of transport systems, vehicles and heating, the requirements of large energy users and the development of housing and offices.

Economic - These critical upgrades will help strengthen Dublin's economy, encouraging and supporting future investment.

Community - EirGrid's community benefit policy will directly support local communities in the areas that host the project infrastructure.

Further details in relation to the background and need for the proposed development are set out in Section 2 of the PECR prepared by RPS and submitted as part of the SID planning application documentation.

3 Site Location and Context

The subject 1.124ha site is located at East Wall Road (R131 regional road), East Wall, Dublin 3, as illustrated in **Figure 3-1** and on the Site Location Map Drawing no. CP1273-RPS-03-PL-SL-D-C-2160 prepared by Bright Design Architects (BDA) and submitted as part of the SID application pack.

The site is currently in use as a temporary surface car park for ESB Networks staff with an adjacent vacant brownfield site. The residential area of East Wall is located to the southwest of the site and generally comprises two storey residential dwellings. The site is bounded to the west by the Portside Business Centre, to the east by a Dublin Port Company (DPC) Storage Site, to the north by the M50 and Port Tunnel Control building and Tolling facility.

The subject site is located approximately 50m south from the Belcamp – Shellybanks 220 kV circuit which currently runs on the northern side of the M50. The proposed substation will connect into this 220 kV circuit via a trenchless crossing of the M50. This grid connection does not form part of the proposed SID planning application. It has, however, been considered and assessed within the documentation submitted as part of the SID planning application package.

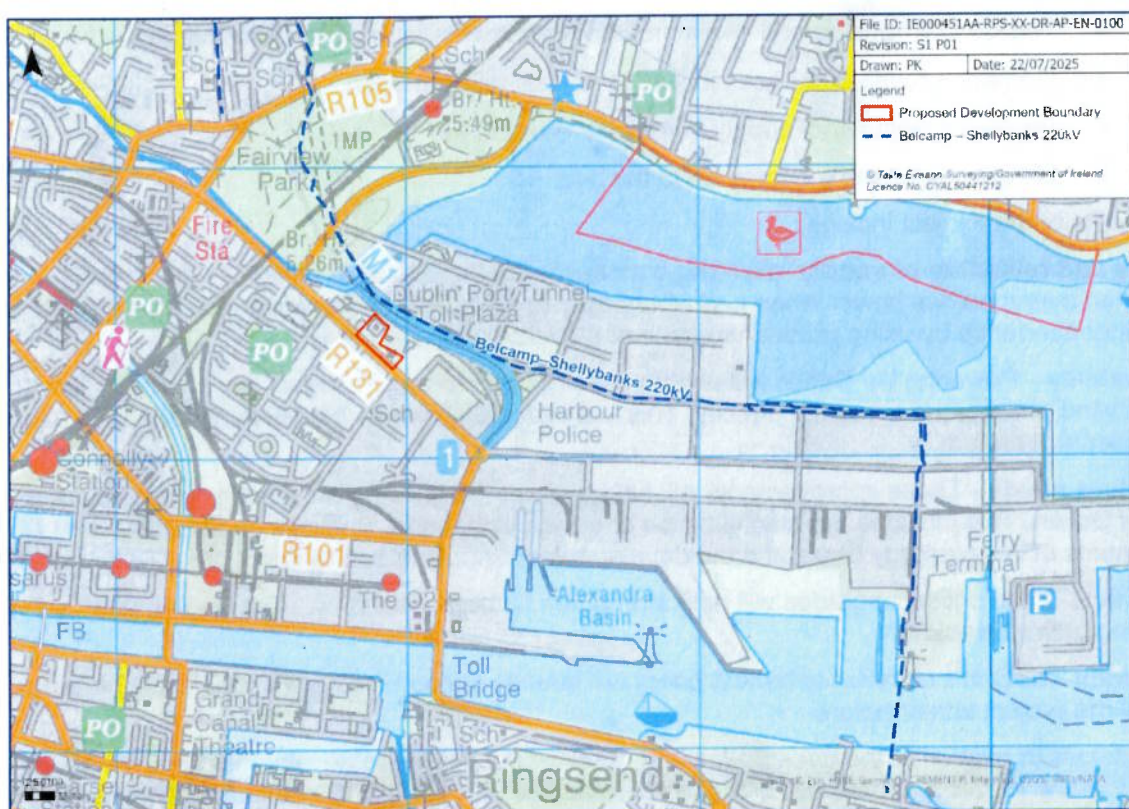


Figure 3-1: Site Location

Source: Tailte Éireann Surveying / Government of Ireland with annotation by RPS

4 Summary of Proposed Development

As set out in the statutory planning notices and Chapter 4 of the PECR prepared by RPS and submitted as part of the SID application package, the proposed development will consist of:

- Change of use from car park to electricity infrastructure;
- Demolition of existing buildings, structures and general site clearance;
- 1 no. 2-storey 220 kV Gas Insulated Switchgear (GIS) substation building occupying an area of c. 51.8m x 22.2m and 20m in height to include the GIS switchgear comprising of insulated circuit breakers, disconnectors and other high voltage equipment, an emergency diesel generator, all necessary welfare facilities, office spaces, and monitoring and control equipment required for the operation and maintenance of the substation;
- 1 no. 2-storey 110 kV GIS substation building occupying an area of c. 51m x 15.9m and 16.5m in height to include the GIS switchgear comprising of insulated circuit breakers, disconnectors and other high voltage equipment, an emergency diesel generator, all necessary welfare facilities, office spaces, and monitoring and control equipment required for the operation and maintenance of the substations;
- 3 no. transformers to transform electrical power from 220 kV to 110 kV and associated acoustic enclosures (c. 5.3m in height) and c 1m high lightning protection rods extending to a height of c. 11m above ground level;
- Electrical cables located within the site boundary;
- Site lighting within the substation compound;
- Closure of all existing entrances to the site and the provision of new vehicular and pedestrian access from East Wall Road;
- Closure of all existing entrances to the site and the provision of new vehicular and pedestrian access from East Wall Road;
- Ancillary car parking spaces including internal access roads;
- 2.6m high palisade security fence and associated gates;
- A public-facing fence and associated gates along East Wall Road varying in height from c. 2.4m to c. 3m;
- Public realm improvements including the provision of seating areas and landscaping;
- Associated utility connections including water supply, foul drainage and surface water drainage, including the provision of an underground storm water attenuation tank; and
- All other associated ancillary above and below ground development, including works comprising or relating to construction works, roadworks and excavation.

The proposed substation will tie into the existing Belcamp – Shellybanks 220 kV circuit which runs along the northern side of the M50 motorway. This connection does not form part of the proposed SID planning application.

5 Response to Submissions

5.1 Dublin City Council

Dublin City Council's (DCC's) submission to ACP in relation to the subject SID application is generally supportive of the proposals and notes that the development is in accordance with national, regional and local planning policies. The submission includes internal reports from the Environmental and Transportation Department, Drainage Division, and Parks Department. In all instances, no objections were raised, subject to recommendations.

The response to DCC's submission is addressed in detail under the following headings:

- Land use
- Visual Impact
- Landscaping and Boundary Treatment
- Drainage
- Transportation
- Air and Noise
- Environmental Impact Assessment and Appropriate Assessment
- Conclusion and Recommended Conditions

5.1.1 Land Use

DCC's submission confirms that the proposed substation is a permissible use under the 'Zone 6 – Employment / Enterprise' zoning objective and aligns with the definition of a 'public service installation' as set out in the Dublin City Development Plan (CDP). In this regard, the submission states that *"it is considered that the Proposed Development is acceptable within the land use zoning objective for the subject site"*.

The submission also acknowledges that the site is located within a Strategic Development Regeneration Area (SDRA 6 - Docklands). DCC note that while there are no site-specific objectives relating to the subject site, East Wall Road is identified as a 'Core Pedestrian Spine'. In this regard, DCC states that *"the proposed public realm improvements and the high quality landscaping will reinforce East Wall Road as a 'Core Pedestrian Spine' in accordance with the SDRA"*. These measures are consistent with the SDRA's guiding principles and demonstrate EirGrid's commitment to contributing positively to the urban fabric and pedestrian experience in the area.

5.1.2 Visual Impact

DCC's submission notes that the Proposed Development will introduce 2 no. substation buildings into a mixed urban landscape of residential and industrial uses. The submission acknowledges that the proposed buildings have been located towards the public-facing front boundary of the site to assist in screening the associated transformers, car parking, and other services to the rear. DCC further acknowledges that the buildings incorporate architectural cladding and materials to break up their scale and massing and provide visual interest to the streetscape.

EirGrid welcomes DCC's recognition of the design approach taken to address visual impact and confirms its commitment to further engagement with DCC regarding the final details of materials and finishes. As noted in the Architectural Design Statement prepared by BDA *"the final design seeks to balance stringent technical, security and safety requirements with a bespoke site strategy, carefully considered building forms and façade treatments...the proposal achieves a balance between operational requirements and site responsive design through architectural innovation, ensuring that*

this critical substation infrastructure contributes positively within a challenging urban context". Should ACP be minded to grant permission for the proposed development, EirGrid would welcome a condition requiring further consultation with DCC to agree these details.

5.1.3 Landscaping and Boundary Treatment

DCC's submission acknowledges that landscaping and boundary treatment measures have been incorporated to soften the overall appearance of the site, and notes that during pre-application consultation, the applicant was advised that high-quality treatment of the boundary facing the public road would be required.

As detailed in the drawings submitted as part of the SID planning application, the boundary treatment along East Wall Road was developed following a series of design studies to meet key criteria, notably; security, visual interest, transparency, and durability. The proposed layout comprises a layered approach with a decorative outer fence varying in height and planarity to create kinetic visual interest, and a secondary 2.6m high palisade fence behind it for security. Pockets of greenery and seating are integrated where the footpath widens, enhancing the pedestrian experience. Lighting and CCTV systems have also been designed to minimise light spill and visual intrusion while maintaining safety and operational requirements.

DCC's submission includes a number of recommendations by DCC's Parks and Landscape Services; our responses to which are set out subsequently:

- It is recommended that a low hedge should be provided along the outer boundary fence to integrate the development into the locality.

In this regard, we would highlight that a pyracantha hedge is proposed between the palisade fence and the decorative railing, providing a low, dense, and visually appealing boundary treatment. Pyracantha hedging is proposed owing to the fact that it is an evergreen hedge that provides vibrant spring flowers that attract pollinators, while its bright autumn berries feed birds. Locating this hedge behind the decorative railing is also considered to provide more meaningful space for the members of the public to use as a circulation and seating area.

- The Parks and Landscape Services suggests that there is potential to surface some areas with reinforced grass to improve the overall visual appearance of the site.

In this regard, we would note that crushed stone surfaces are required for operational access and maintenance. However, EirGrid is open to exploring alternative surface treatments, such as reinforced grass, in consultation with DCC, subject to technical feasibility.

- It is suggested that vertical greening should be considered to mitigate the visual scale of the proposed buildings and improve biodiversity.

In this regard we would note that vertical greening is not technically feasible for a substation development due to electrical safety and engineering constraints. Instead, architectural cladding and complementary planting have been used to mitigate scale and enhance visual interest.

- The Parks and Landscape Services recommends the provision of a steel railing with a black or dark green colour on the public roadside boundary.

In this regard, DCC's submission concludes that *"it is considered that further agreement with the Parks and Landscape Services regarding the boundary treatment and landscaping should be agreed in the event that permission is granted"*. On foot of this recommendation, we can confirm that EirGrid would welcome a planning condition as part of any grant of permission to facilitate further discussion with DCC's Parks and Landscape Services to agree detailed landscape design.

5.1.4 Drainage

DCC's submission notes that DCC's Drainage Planning, Policy and Development Control Section has no objection to the proposed development, subject to the developer complying with the Greater Dublin Regional Code of Practice for Drainage Works (Version 6.0) and implementing the 7 no. recommendations set out in DCC's submission.

In this regard, we would note that the proposed drainage strategy has been developed in accordance with best practice and relevant guidance documents. We can confirm that EirGrid would be happy to accept a planning condition on any grant of permission to facilitate DCC's recommendations where these would not otherwise be fulfilled through compliance with relevant codes of practices or other statutory requirements.

5.1.5 Transportation

DCC's submission includes inputs from the Transportation Planning Division (TPD), Traffic Division, and Active Travel Programme Office (ATPO). The submission notes that the TPD is generally supportive of the proposed development and that further agreements relating to changes to the public road can be addressed by way of condition on a grant of permission. DCC's submission includes a number of recommendations; the following of which are of particular note:

- The proposed removal of 40m of delineated cycleway to widen and improve the site entrance is considered to be excessive, and 20m is recommended as a more appropriate entrance width by the ATPO.

In this regard, we would highlight that the proposed entrance width has been designed to accommodate safe and efficient access for operational and emergency vehicles, including abnormal loads such as 220 kV transformers. This is detailed in Section 8.5.1 of the PECR prepared by RPS and submitted as part of the SID planning application. Notwithstanding this, EirGrid would welcome further engagement with DCC to refine this detail and supports the inclusion of a condition on any grant of permission to facilitate further discussion and agreement with the ATPO prior to commencement of development.

- The preparation of an updated Construction Management Plan (CMP) is recommended by DCC to include provision for onsite cycle parking and scheduling of traffic to avoid peak hour impacts and minimise disruption to adjacent properties.

In this regard, EirGrid acknowledges the importance of managing construction impacts and confirms that an updated CMP will be prepared and submitted to DCC prior to commencement of development. This will include provisions for cycle parking and traffic scheduling to avoid peak hours and minimise disruption to neighbouring properties, including St. Joseph's Co-educational Primary School.

- In addition to the above, DCC's submission recommends that the applicant liaises with relevant DCC Sections prior to commencement of development to agree details in relation to active travel and public realm changes prior to commencement of development.

In this regard, we can confirm that EirGrid is open to further engagement with DCC to refine this detail and supports a condition requiring consultation and agreement with DCC's Environment and Transportation Section prior to commencement of development

5.1.6 Air and Noise

DCC's submission acknowledges that, with appropriate mitigation measures in place, noise levels associated with the Proposed Development will remain within acceptable limits. In this regard, and

as detailed in Chapter 12 of the PECR prepared by RPS and submitted as part of the SID application, noise was assessed for both construction and operational phases. Baseline noise levels were measured near sensitive locations, including residential properties and St. Joseph's Co-educational Primary School.

During the construction phase, most locations are expected to remain within acceptable limits, with any short-term exceedances mitigated to ensure residual effects are minor and temporary. Construction traffic noise is expected to have a negligible to minor impact.

During the operational phase, the main source of noise will be the transformers, which will be enclosed to reduce sound levels. The assessment confirms that noise from the site will be more than 10 dB below background levels, with no tonal noise expected. The development will also meet EirGrid's internal noise standards (XDS-GFS-00-001-R4), which set limits of 55 dB(A) during the day and 45 dB(A) at night at the nearest property.

DCC's submission recommends that noise mitigation and monitoring measures be implemented throughout construction and operation, and that the cumulative effects be considered. DCC also recommends that Construction Management Plan (CMP) is prepared to include noise control measures, hours of operation, and compliance with relevant standards including BS 4142:2014. In this regard, we can confirm that EirGrid is fully supportive of this recommendation and is committed to implementing all proposed noise control measures to ensure compliance with all relevant development standards.

5.1.7 Environmental Impact Assessment and Appropriate Assessment

DCC's submission acknowledges that ACP is the competent authority with regard for both Environmental Impact Assessment (EIA) and Appropriate Assessment (AA). The submission notes that the planning application includes the relevant documentation to assist ACP in their assessment, including an EIA Screening Report, an AA Screening Report, and a PECR, all prepared by RPS.

The EIA Screening Report concludes that the proposed development does not fall within the classes of development listed in Schedule 5 of the *Planning and Development Regulations 2001* (as amended) and therefore the development does not require an Environmental Impact Assessment. Notwithstanding this, the PECR submitted as part of the SID application, addresses potential environmental effects across a range of relevant topics to assist ACP with their assessment of the proposals.

The AA Screening Report submitted as part of the SID application documentation concludes that the project will not result in Likely Significant Effects on any European sites. As such, RPS are of the opinion that a Stage 2 AA is not required in this instance.

5.1.8 Conclusion and Recommended Conditions

DCC's submission concludes that, *"given the current need for the critical electricity infrastructure, the zoning of the site and its context adjacent to the Dublin Port Tunnel lands, the planning authority are overall supportive of the proposal subject to final agreement of the design, materials and boundary treatments"*.

The submission sets out 10 no. recommended planning conditions to attach to any grant of permission. In this regard, we would respectfully ask that ACP considers and applies only necessary conditions as, for the most part, the requirements recommended by DCC have already been addressed as part of mitigation measures, are provided for under other codes of practice or statutory regulations, and/or are explicitly provided for within the SID planning application particulars.

We would also note the following with regard for 2 no. specific recommendations:

- DCC's **recommended condition 2** seeks the submission of a Communication Plan prior to commencement of development. In this regard we would respectfully direct

ACP to EirGrid's 'Stakeholder Engagement Plan 2025'¹. This policy document sets out EirGrid's approach in relation to community engagement for all EirGrid projects and is considered to be suitably detailed to serve as a Communication Plan in this instance.

- DCC's **recommended condition 9(b)** suggests reduced construction working hours to those proposed in the SID application documentation. In this regard, it is considered that the proposed working hours set out in **Section 4.2.7** of the PECR (i.e. 7.00am to 7.00pm Monday to Friday, and 8.00am to 4.30pm on Saturdays) are reasonable given the development's city centre location.

Notwithstanding the above, we can confirm that EirGrid generally welcomes DCC's recommendations and is fully committed to continuing to engage with DCC to agree details of proposed materials and finishes, specification of hard and soft landscaping, and details of works to the public road prior to construction of the proposed development. EirGrid is committed to undertaking all mitigation measures proposed in the PECR prepared by RPS and submitted as part of the SID planning application, and will fully comply with all relevant codes of practice and other statutory regulations as required.

5.2 Transport Infrastructure Ireland

Transport Infrastructure Ireland (TII)'s submission is supportive of the proposed development, recognising its alignment with Project Ireland 2040's National Strategic Outcomes (NSO), particularly NSO 8 (Transition to a Low Carbon and Climate Resilient Society) and NSO 9 (Sustainable Management of Water and Environmental Resources). TII's submission highlights the importance of safeguarding the capacity and safety of the national road network, and particularly the uninterrupted operation of the Dublin Tunnel adjacent to the proposed site.

The submission includes 5 no. recommended planning conditions to attach to any grant of permission to facilitate ongoing engagement with TII, ensure compliance with TII standards and ensure that necessary consents are obtained prior to construction. In this regard, we can confirm that EirGrid is fully supportive of these recommendations and is willing to accept associated conditions on any grant of permission where such conditions would not otherwise be fulfilled through compliance with relevant codes of practices or other statutory requirements.

5.3 Uisce Éireann

Uisce Éireann has reviewed the documentation submitted as part of the SID planning application, including the Planning Report, Engineering Services Report, and associated drawings. Uisce Éireann's submission confirms that both the connection to public water and wastewater infrastructure and the proposed diversion of an existing 24-inch cast iron water main are feasible without requiring infrastructure upgrades. This is based on the issued Confirmation of Feasibility under CDS25006365 (connection) and DIV25275 (diversion).

Uisce Éireann's submission outlines 5 no. recommendations to ensure the protection and provision of water and wastewater services. In this regard, we can confirm that EirGrid is fully supportive of these recommendations and is willing to accept associated conditions on any grant of permission where such conditions would not otherwise be fulfilled through standard utility coordination processes or compliance with relevant codes of practices.

¹ <chrome-extension://efaidnbmnnnibpcajpcglclefindmkai/https://cms.eirgrid.ie/sites/default/files/publications/Final-Stakeholder-Engagement-Plan-2025.pdf>

5.4 Department of Housing, Local Government and Heritage – Development Applications Unit

The Department of Housing, Local Government and Heritage (DHLGH), through its Development Applications Unit (DAU), has reviewed the documentation submitted as part of the SID planning application. In their submission, the DHLGH specifically references Chapter 14 of the submitted PECR, which includes a desk-based Archaeological Impact Assessment (AIA) prepared by Courtney Deery Heritage Consultancy Ltd. (July 2025).

The DHLGH's submission notes that the DHLGH is broadly in agreement with the findings of the AIA and recommends the inclusion of 4 no. conditions as part of any grant of permission. In this regard, EirGrid acknowledges and welcomes the DHLGH's support and confirms its full commitment to implementing all archaeological and cultural heritage mitigation measures outlined in Chapter 14 of the PECR. EirGrid is fully supportive of the DHLGH's recommendations and is willing to accept associated conditions on any grant of permission where such conditions would not otherwise be fulfilled through other statutory requirements.

5.5 Third Parties

In addition to the submissions by DCC, TII, UÉ and DHLGH, 5 no. submissions from local residents were made to ACP in relation to the proposed development. As the submissions from local residents raised similar topics (2 no. of which were identical submissions), we set out below our combined response arranged under the following key headings:

- Site Selection and Land Use Zoning Objective
- Impact on Residential Amenity
- Visual Impact
- Air Quality
- Noise and Vibration
- Site Lighting
- Traffic
- Health and Safety
- Water Pressure
- European Sites
- Property Devaluation
- Community Consultation
- Community Benefit Fund

5.5.1 Site Selection and Land Use Zoning Objective

5 no. of the submissions received by ACP (Martin Ivers, on behalf of the Ivers family, Veronica Kennedy, on behalf of the Kennedy household, Peter McCarthy, Sinéad Collins, and Marion Murnane) query the suitability of the site and the site selection process.

In response to the above, we would note that a Multi-Criteria Analysis (MCA) was undertaken to determine site selection. The MCA approach is a structured decision-making approach that evaluates multiple options against several criteria. We refer to Section 5.3.2.2 of the PECR and Table 5.1 which sets out the categories and sub-criteria for MCA. Table 5.3 sets out the potential

locations that were reviewed for the Proposed Development. The outcome from the MCA identified the East Wall site as the Emerging Best Option to progress.

While it is acknowledged that the site is in close proximity to an existing residential area, the proposed design has been carefully developed in close consultation with the community, DCC and other key stakeholders to reduce potential negative impacts and ensure a high quality, visually appealing development that will contribute positively to the surrounding area.

2 no. submissions (Peter McCarthy and Sinéad Collins) are of the opinion that the Proposed Development conflicts with the land use zoning.

In response to the above, and as set out in Section 6.1.5.1.2 of the PECR, we note that the Proposed Development is located on lands zoned 'Zone 6 - Employment / Enterprise' as identified in the CDP. Under this zoning objective, a 'public service installation' is a permissible use. The Proposed Development fully complies with the definition for 'public service installation' (as defined in Appendix 15 – Land Use Definitions of the CDP).

Further to the above, DCC's submission to ACP (see **Section 5.1.1** of this Response Report) confirms that the proposed substation is a permissible use under the 'Zone 6 – Employment / Enterprise' zoning objective and aligns with the definition of a 'public service installation' as set out in the CDP.

In this regard, it is considered that the Proposed Development is fully compliant with the land use zoning objective and therefore is an appropriate use for the subject site.

5.5.2 Impact on Residential Amenity

4 no. of the submissions received by ACP (Martin Ivers, on behalf of the Ivers family, Veronica Kennedy, on behalf of the Kennedy household, Peter McCarthy and Marion Murnane) are of the view that the Proposed Development will negatively impact the residential amenity of the local area. In addition, 1 no. submission (Peter McCarthy) notes that there has been cumulative burden of infrastructural developments in the East Wall area.

In response to the above, we would highlight that the Proposed Development has been carefully designed to respond to the subject site's context, with a focus on protecting the amenity of existing dwellings in the area and other sensitive receptors. The proposals include the provision of significant upgrades to the public realm; providing a new, passive amenity space for the local community and improving the walkability of East Wall Road and access to other local services and amenities. The upgraded public realm will also improve the visual environment, making the area feel safer and more inviting.

We refer to Section 9 of the PECR which includes an assessment of the Proposed Development on the local population. This assessment concludes that the Proposed Development will have positive, long-term and moderate effects on the study area, promoting economic well-being and population growth.

In addition to the above, we refer to **Section 5.5.13** of this Response Report which provides details on the Community Benefit Fund. This significant additional investment in community initiatives will benefit local residents and businesses and will directly impact the residential amenity of the area.

With regard for the perceived cumulative burden on the area, we refer to Section 6.2 of the PECR, in which planning applications within 250m of the site over the last 10 years have been reviewed. The majority of the applications have been for minor works or modifications to existing residential and commercial buildings, changes of use of existing commercial buildings, signage, and subdivision of units for commercial / residential use. The area surrounding the subject site is, by its nature, a transitional space which accommodates port-related uses, the Dublin Tunnel and a mix of land uses including industrial, commercial and residential uses. The proposed development has been designed to respond to this context with high quality materials and finishes proposed and significant improvements to the public realm to ensure the proposals are fully integrated into the

receiving environment. In this regard, we do not consider the Proposed Development to contribute to a cumulative burden on the East Wall area but will instead enhance the area through the development of this currently underused site.

5.5.3 Visual Impact

3 no. submissions received by ACP (Martin Ivers, on behalf of the Ivers family, Veronica Kennedy, on behalf of the Kennedy household, and Marion Murnane) consider that the Proposed Development will have a negative visual impact on East Wall Road and the surrounding residential area. 1 no. submission received by ACP (Marion Murnane) notes that the visual impact of the Proposed Development will discourage tourists from visiting this area.

In response to the above, it is acknowledged that the Proposed Development includes the construction of two substation buildings which are relatively large in scale into a receiving urban landscape that includes well-established, sensitive residential uses. The potential impact on the character and setting of this area, as well as residential amenity, was therefore a key design consideration from the outset. To ensure the subject proposals would integrate well into this receiving environment, Architects (namely BDA) were appointed and included on the design team to consider aspects such as visual impact, façade composition and overall aesthetics. The Architectural Design Statement prepared by BDA sets out, inter alia, the design concept, the design evolution, the historic touchpoints that were considered, the material study that was undertaken and the way that the boundary was developed.

The site layout was developed to reduce visual prominence, with the substation buildings positioned to screen rear elements and enhance the public realm interface. The final design seeks to balance stringent technical, security and safety requirements with a bespoke site strategy, carefully considered building forms and façade treatments. The two substation buildings differ in size but are connected visually by complimentary yet differing forms and material treatments. The geometry of these forms take inspiration from local industrial heritage and seek to create visual interest and dynamism to engage passers-by. Layered fencing and planting provide the necessary security and screening while engaging with the public realm and residential housing opposite the site. The proposed landscape scheme includes evergreen pyracantha hedging, ornamental shrubs, and street trees along East Wall Road, which will screen the boundary palisade fence and soften the appearance of the substation buildings.

Chapter 13 of the PECR prepared by RPS and submitted as part of the SID planning application package includes an assessment of the landscape and visual amenity impact of the Proposed Development. The assessment concludes that impacts on views held by nearby residents of dwellings on East Wall Road will be moderate but not significant (year 1 of operation). This takes account of the balance between the adverse effects relating to the scale of the proposed buildings and the beneficial effects associated with the design of the cladding materials and the proposed planting.

Further details relating to the proposed layout, design, scale, massing, boundary treatments and materials and finishes are set out in the Architectural Design Statement prepared by BDA and enclosed as part of the SID planning application package.

While the selected materials and finishes have been carefully considered to address feedback from DCC and the local community while meeting ESB's technical requirements, it is accepted that there is scope for further discussion and agreement with DCC regarding specific details of finishes, without affecting the principle, nature and extent of the Proposed Development. EirGrid would therefore be happy to accept a condition of permission (should ACP be disposed to grant permission) to further discuss and agree these details with DCC.

5.5.4 Air Quality

1 no. submission received by ACP (Peter McCarthy) suggests that the planning application should have contained independent air quality studies benchmarked to World Health Organisation standards.

Regarding the above, we refer to Section 10 of the PECR, which describes the air quality assessment carried out for the Proposed Development in accordance with relevant legislation and guidelines. Section 10.6 of the PECR concludes that there will be no significant effects on air quality anticipated as a result of the Proposed Development.

The PECR notes that all construction activities will be carried out in accordance with best practices and guidelines for the management of dust generation and control of pollutants. It also confirms that the measures taken forward from the will be reviewed on a regular basis during construction to ensure that they are appropriate for the works taking place and any complaints will be considered.

Having regard for the above, and for Section 10 of the PECR, it is considered that air quality has been fully assessed in the planning application and no significant impacts will occur as a result of the proposed development.

5.5.5 Noise and Vibration

4 no. submissions received by ACP (Martin Ivers, on behalf of the Ivers family, Veronica Kennedy, on behalf of the Kennedy household, Peter McCarthy and Marion Murnane) suggest that the substation will create noise which will in turn cause disturbance.

In this regard, we refer to Section 12 of the PECR, which describes the noise and vibration assessment carried out for the Proposed Development in accordance with relevant legislation and guidelines.

The assessment found that there was the potential for a significant effect on noise and vibration impacts due to construction activities, and noise impacts due to operational activities. To mitigate against these impacts, the PECR includes a number of measures (as set out in Section 12.5 of the PECR). Following the implementation of these construction and operational mitigation efforts, the assessment concludes that the Proposed Development is not predicted to create significant residual effects at either the construction or operational stage.

Having regard for the above, it is considered that noise and vibration has been fully assessed in the planning application and no significant impacts will occur as a result of the proposed development.

5.5.6 Site Lighting

1 no. submission received by ACP (Marion Murnane) suggests that site lighting will cause a significant and permanent increase in light pollution.

In response to the above, we refer to Section 4.1.9 of the PECR, which describes the lighting strategy for the Proposed Development. We also refer to Section 6.1.5.1.9 of the PECR, which sets out the CDP policies in relation to light.

The lighting design for the substation compound prioritises minimising light pollution. All external lighting will be mounted and directed inwards, facing the buildings and internal operational areas, to avoid light spill beyond the site boundary and reduce visual impacts on nearby residential receptors. The buildings will have external lighting installed for operational and safety purposes. However, this will be limited to façade-mounted, downcast fixtures to ensure lighting is contained within the compound perimeter and security lighting will also be provided, designed to operate on motion sensors or timers where appropriate to limit unnecessary continuous illumination.

Having regard for the above, it is considered that the Proposed Development is fully compliant with the CDP's policies regarding light. The lighting strategy has been carefully designed to balance

operational requirements with the need to minimise impacts on surrounding residential properties. Therefore, it is not considered that the Proposed Development will cause a significant increase in light pollution.

5.5.7 Traffic

1 no. submission received by ACP (Marion Murnane) suggests that the construction traffic will cause significant disruption in the local area.

In response to the above, EirGrid acknowledges the importance of managing construction impacts and confirms that an updated Construction Management Plan (CMP) will be prepared and agreed with DCC prior to commencement of development. This will include scheduling of construction traffic to avoid peak hours and minimise disruption to neighbouring properties, including St. Joseph's Co-educational Primary School. Mitigation measures to curtail potential impacts caused by construction traffic are outlined in Section 8.5.1 of the PECR.

In this regard, we consider the concern regarding construction traffic to be fully addressed.

5.5.8 Health and Safety

4 no. submissions received by ACP (Martin Ivers, on behalf of the Ivers family, Veronica Kennedy, on behalf of the Kennedy household, Peter McCarthy and Marion Murnane) raised health and safety concerns in relation to the Proposed Development, including the potential long-term effects of electromagnetic fields (EMFs) generated by substations.

In response to the above, we refer to Table 1.3 of the PECR, in which we respond to common concerns regarding EMFs and health. EirGrid has also prepared a document outlining the impact from EMF's titled '*Your guide to understanding electric and magnetic fields (EMFs) in the electricity transmission system*' (EirGrid, 2024)². In summary, extensive scientific research has found no hazardous effects from long term exposure to low levels of EMFs. This includes the small amounts of extremely low frequency EMFs produced by electricity infrastructure.

Submissions received by ACP also include concerns regarding emergency access to the site. In response to this, we refer to Section 4.1.4 of the PECR which relates to Access Arrangements, and notes that the internal roads and maintenance areas have been designed using Autotrack software to ensure adequate turning space for maintenance and emergency vehicles. It is also noted that the proposed back up diesel generators will be housed in dedicated rooms with appropriate fire protection, ventilation and spill containment measures. Furthermore, Section 4.1.8 of the PECR relates to Firefighting Systems and Controls and notes that the Proposed Development will include the installation of external fire hydrants positioned to serve both GIS buildings, ensuring adequate coverage in the event of an emergency. Hydrant locations will be determined based on access for emergency services and in consultation with Dublin Fire Brigade. A Fire Safety Certificate application will be submitted to DCC prior to the commencement of construction, in line with the standard process for substation developments.

Having regard for the above, it is considered that all health and safety concerns are fully addressed in the PECR, and other documentation submitted as part of the SID planning application.

5.5.9 Water Pressure

1 no. submission received by ACP (Marion Murnane) raises a concern regarding water pressure in the local area.

In response to the above, we refer to Sections 4.1.5, 4.1.6 and 4.1.7 of the PECR which sets out the proposed water services for the Proposed Development. It is highlighted that the Proposed

² [EMF-Information-Brochure-2024.pdf](#)

Development is an unmanned substation with occasional access for operation, inspection and maintenance. Therefore, it is not anticipated that the Proposed Development will add any significant pressure to existing water services in the local area.

5.5.10 European Sites

1 no. submission received by ACP (Peter McCarthy) suggests that the planning application should have contained a hydrogeological and contamination risk assessment regarding potential connectivity to the Tolka River and Dublin Bay.

In response to the above, we can confirm the proposed development assessed the likelihood of significant impacts on European Sites, including the South Dublin Bay and River Tolka Estuary SPA, South Dublin Bay SAC and North Dublin Bay SAC. Table 5.1 in the submitted Report to Inform Screening for AA prepared by RPS sets out a full list of European Sites considered in the screening assessment.

The Report to Inform Screening for AA concluded that although hydrological connectivity was identified, given the scale and nature of Proposed Development, the setback distance between the Proposed Development and the closest coastal waterbody, and the negligible potential for any surface water run-off, the magnitude of the impacts would not result in a likely significant effect to any European Sites. It was concluded that any impacts will be localised and therefore not deemed significant.

Having regard for the above, it is considered that the SID planning application documentation fully assesses potential hydrogeological and contamination risk. The assessment concludes that there will be no significant impacts on European Sites.

5.5.11 Property Devaluation

4 no. submissions to ACP (Martin Ivers, on behalf of the Ivers family, Veronica Kennedy, on behalf of the Kennedy household, Peter McCarthy, and Marion Murnane) suggested that the proposed development would result in the devaluation of residential property in the area.

Having regard for the above, it is noted that the subject site is located in an urban area which is, by its nature, characterised by a rich tapestry of uses and built forms. For example, there is an existing substation and railway in the immediate area which are located adjacent to residential properties. In terms of the potential for property devaluation, there will always be a complex mix of variables which will be assessed and weighted by purchasers, over and above proximity to a public utility (or substation), such as proximity daily necessities and services such as work, shopping, education, healthcare, and leisure in addition to proximity to friends / family, etc. The central location lands in the vicinity of the subject site in Dublin 3 offers purchasers the attractive opportunity to enjoy a richly served 15-minute city. Having regard to the foregoing, it is considered that the concerns relating to property devaluation are unfounded.

The proposed development will deliver significant upgrades to the public realm, enhancing the overall appearance of the area and improving the pedestrian experience. In this regard, the proposals will replace the existing, inactive, blank concrete boundary wall with a more visually permeable interface that includes pockets of greenery and public seating. It is considered that these improvements to the streetscape will have a positive impact on East Wall Road and the wider urban area.

5.5.12 Community Consultation

3 no. submissions to ACP (Martin Ivers, on behalf of the Ivers family, Veronica Kennedy, on behalf of the Kennedy household and Marion Murnane) were of the opinion that the community was not consulted about the Proposed Development prior to the site notice erection. Additionally, 1 no.

submission (Sinéad Collins) was of the opinion that the community's opinion at the information event in the East Wall was not reflected strongly enough in the feedback summary.

As set out in Section 1.5.3 of the PECR, EirGrid has developed a 6-step consultation process aimed at improving communication with the public and other stakeholders. This 6-step process is set out in its consultation document entitled "*Have Your Say*"³.

EirGrid held 3 no. information events in the East Wall area in June 2024 to provide members of the public with information on the Central Dublin Substation Project. These drop in events offered interested people and groups an opportunity to speak with a member of the technical team and the EirGrid Community Liaison Officer.

Feedback from this consultation, and how concerns were addressed in the subject proposals, is summarised in Table 1.3 of the PECR, and Sections 4 and 5 of the Public Engagement Report.

Having regard for the above, and for the PECR and the Public Engagement Report, it is considered that the community was fully consulted in relation to the Proposed Development prior to the site notice erection. EirGrid are fully committed to continued consultation with the local community and are happy to engage with groups and individuals to ensure all concerns are addressed at the detailed design stage, throughout the construction phase and during the operational lifetime of the proposed development.

5.5.13 Community Benefit Fund

1 no. submission received by ACP (Sinéad Collins) queried the community gain and how the local community is to participate in Community Benefit Fund.

In response to the above, we refer to Section 4.5 of the PECR, which notes that the Proposed Development has the potential to provide significant additional investment in community initiatives which will benefit local residents and businesses through an annual Community Benefit Fund. The Community Benefit Fund will become live once the project has received its planning approval, and the fund will be released on a phased basis as the project progresses.

The Community Benefit Fund is one of the initiatives of EirGrid's Community Benefit Policy ([EirGrid-Community-Benefit-Policy-Brochure June 2023.pdf](#)⁴) which recognises the importance of local communities.

The Community Benefit Fund aims to support local communities affected by infrastructure projects, providing financial assistance for community, sustainability, and biodiversity initiatives. It is part of EirGrid's commitment to engage with communities and address their concerns while minimising disruption during project construction. Having regard to the foregoing it not considered appropriate or necessary that the fund is referred to in planning conditions.

How the Community Benefit Fund is operated by EirGrid is explained in the Community Benefit Policy brochure. Further information in relation to existing Community Benefit Funds can be found here [Engaging the Public | In the Community | EirGrid](#)⁵.

³ <https://cms.eirgrid.ie/sites/default/files/publications/EirGrid-Have-Your-Say-%28Final-Version%29.pdf>

⁴ <https://cms.eirgrid.ie/sites/default/files/publications/EirGrid-Community-Benefit-Policy-Brochure%20June%202023.pdf>

⁵ <https://www.eirgrid.ie/community/engaging-public>

6 Conclusions

A total of 9 no. submissions in relation to the subject SID planning application were received and accepted by ACP. Of these submissions, 4 no. were by prescribed bodies including DCC, TII, Uisce Éireann and the DHLGH. Another 5 no. submissions were made by local residents. The submissions covered a variety of topics and have been fully responded to in this Response Report.

This Response Report has highlighted that subject site has been carefully selected as part of an MCA process which evaluated multiple options against several criteria to ensure the selected site represented the best option for the Proposed Development. As confirmed in DCC's submission to ACP, the proposals represent a '*public services installation*' which is a permissible use under the zoning objective for the subject site.

The Proposed Development, which comprises of the construction of a new transmission substation in East Wall, Dublin 3, has been designed with regard for its surrounding context and in particular its proximity to existing residential neighbourhoods. Significant non-statutory consultation was undertaken with the local community and with DCC and other stakeholders to ensure concerns were fully addressed in the subject proposals. In this regard, the site layout was developed to reduce visual prominence, with the substation buildings positioned to screen rear elements and enhance the public realm interface. The proposals include the provision of significant upgrades to the public realm; providing a new, passive amenity space for the local community and improving the walkability of East Wall Road and access to other local services and amenities. The upgraded public realm will also improve the visual environment, making the area feel safer and more inviting.

While the selected materials and finishes have been carefully considered to address feedback from DCC and the local community while meeting ESB's technical requirements, it is accepted that there is scope for further discussion and agreement with DCC regarding specific details of finishes, without affecting the principle, nature and extent of the Proposed Development. EirGrid would therefore be happy to accept a condition of permission (should ACP be disposed to grant permission) to further discuss and agree these details with DCC.

The documentation submitted as part of the SID planning application has fully assessed the potential impacts that the subject proposals may have in terms of, *inter alia*, air quality, noise, vibration, traffic, transportation, health and safety, and drainage and water supply. The application documentation also includes screening assessment reports in relation to EIA and AA. In this regard, it is submitted that concerns raised in the submissions to ACP are fully addressed in the SID planning application documentation, with relevant sections referenced in this Response Report.

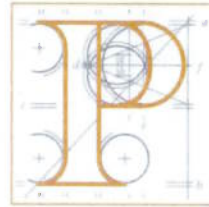
We would reiterate that EirGrid is fully committed to undertaking ongoing consultation with the local community, DCC and other key stakeholders to agree various details of the subject proposals prior to the commencement of development and would welcome relevant conditions on any grant of permission to facilitate this.

Appendices

Appendix A Letter from An Coimisiún Pleanála

Our Case Number: ACP-323291-25

Your Reference: EirGrid



An
Coimisiún
Pleanála

RPS Consulting Engineers Limited
c/o Carl Mogensen
West Pier Business Campus
Dun Laoghaire
Co. Dublin
A96 N6T7

Date: 10 October 2025

Re: The development of a 220/110kV Gas Insulated Switchgear (GIS) substation
On East Wall Road, Dublin 1, County Dublin (<https://www.eirgridcentraldublin.ie/>)

Dear Sir / Madam,

Enclosed is a copy of 9 submission(s) received by the Commission from the following in relation to the above mentioned proposed development:

1. Development Applications Unit
2. Transport Infrastructure Ireland
3. Uisce Eireann
4. Dublin City Council
5. Martin Ivers and Family
6. Peter McCarthy
7. Veronica Kennedy
8. Sinead Collins
9. Marion Murnane

The Commission hereby considers it appropriate to invite you to make a submission on the observations received in relation to the application. Please be advised that any response to the Commission's invitation should not contain any additional reports or supplementary reports and should be confined to the issues raised in the observations received by the Commission. Any submission in relation to the above must be received by the Commission within 4 weeks from the date of this letter (i.e. not later than **5:30pm on Friday 7th November 2025**).

If you have any queries in relation to the matter, please contact the undersigned officer of the Commission.

Teil	Tel	(01) 858 8100
Glaao Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	communications@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

PP EGM

Ellen Moss
Executive Officer
Direct Line: 01-8737285
PA08

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