

An Coimisiun Pleanála

Your Reference: An Coimisiún Pleanála - Case reference: VA29N.323291

Location: On East Wall Road Dublin 3

Matter: Development of a 220/110 KV Gas Insulated Switchgear Substation

Name Observer: Marion Murnane

Address of observer: 186 East Wall Road Dublin 3

Date: 24th September, 2025

Dear Sir/Madam,

I refer to the above matter and I make the following observations;

AN COIMISIÚN PLEANÁLA	
LDG-	083144-25
ACP-	
25 SEP 2025	
Fee: €	50 Type: PMO
Time:	16:24 By: hand

Visual Impact

The above development is proposed in the immediate vicinity of a main road, which is south west of the proposed site and in close proximity to a residential terrace known as East Wall Road. The main terrace on the said road dates back to the late 1800's and was formerly known as Glencullen Terrace. These are two story town houses with vies directly into this proposed site. Currently the site partly a car park and the remaining area has been re-wilded consisting of shrubs, and wild fauna native to the area.

The proposed development is of such an enormous scale that it will have a significant impact on the East Wall Rd which is a residential area. The change of use from car park to a development of this scale will result in an intensification of an industrial nature which will dominate this road. This area is experiencing a sharp increase in population with a recent refugee centre and thousand of residential units which require amenities that create calm and green spaces for recreational use. The applicant notes a high risk for trespassing and vandalism and the necessity for security such as cctv cameras, lighting, and enclosed high boundaries creating a dominate and aggressive environment on the doorstep of residents and adjacent to a local national school St Joseph's primary School. This development is over bearing nature to be in such close proximity to residents and will adversely affect the health a peaceful enjoyment of residents in their homes. Residents will have a daily and inescapable reminder of its presence, thereby severely impacting upon their quality of life.

Screening

The Applicant refers to screening possibilities as being of minimal use in this development due to high security concerns, such as trespassing and vandalism as per their report to inform on

screening which notes that the available space for soft appropriate landscaping scheme is limited (ref CP1273-RPS-03-PL-SL-D-A 2150, pg 14). This means structures as high as 3-5m boundaries will decrease the appeal of the road rather than improve it. This is a lack of vision for the area in terms of the green development plan for the city and further aggravates the heavy industrial character of the development in this residential environment.

Lighting

There will be a significant and permanent increase in light pollution. Although lighting will be internalized there is no avoiding this issue. Current lighting is for footpath safety however high mast security lighting will give this development a prison like character again affecting the enjoyment of residents of their homes.

Emergency/Fire/Health & Safety

The facility has high risk emergency concerns by the nature of this industrial entity. The road is back to back with traffic very evening and this is intensified during times of Croke park matches, concerts, and Point Depot concerts. Access for emergency assistance such as fire brigades and ambulances. to the site will be severely hampered during these times. The close proximity to residents is a major concern. As well as the risks due to the nature of this industry, it will accommodate 3000 liters of diesel for backup significantly increasing the risk of fire, explosions and leakage contamination. This risk will be a permanent worry for residents again who are in very close proximity to this area due to the small size of the site for such a heavy industrialized facility.

Traffic

I note from the traffic report that there will be an increase of 75 daily constructions vehicles at peak construction, which said construction is due to last for a number of years. There is already a significant amount of traffic on this road and parking spaces are limited. It will be chaotic to introduce a mechanism of stopping traffic to accommodate trucks and machinery especially in the context of the area recently undergoing an enormous amount of road works which lasted several years. This disruption will affect commuters, port tunnel traffic, school run to the national school, retail use, residents, refueling at the local petrol station, access to the Clontarf coast rd, access to the toll bridge at Ringed, to Croke Park, St Anne's Park, North Strand and many other roads to which the East Wall Rd connects. This disruption will be significant this is highlighted by Eirgrid in their report IE000-451A-CP1273 Dublin Central Grid Reinforcement Step 3 Report File Ref; cp1273 -RP5-01-RN-XX-R-C-002 page 17 wherein it reads " Due to the high congestion of East Wall Road".

Tourism

The Eirgrid Report noted above does not take into account the future development of the East Wall Rd which is now largely due to the opening of the Moxxy Hotel and further plans for a hotel in the area on the East Rd, is becoming a destination for tourists due to its proximity to the city, and amenities such as Croke Park, the Point Depot, the Aviva Stadium, the Aiport, the M1, and the

M50, this area is a hub for transport and travel convenience for the whole of Dublin City both North and South due to its proximity to the Toll Bridge at the Port area. The visual impact of this industrial development in an area which is attractive for tourists and travelers will detract from this current and potential stream of revenue and uplift to the area.

Water Pressure

Water pressure is low in this area and there are sewage blockage issues due to the age of the adjacent properties. This construction will add pressure to these properties and lives of residents with a growing population.

Property Devaluation

The scale of the proposed project, the traffic issues, the increase in emergency risks, the health implication either real or perceived, the visual impact will affect buyer preferences creating a genuine potential of buyers avoiding buying homes near a ESB substation. This will undoubtedly affect the property value of the area to the detriment of the current owners.

Noise

The development is in too close a proximity for the residents in the area and they will be adversely affected for many years both during construction, during emergencies and during the noise output from the development. This development needs to be relocated to an area that is not in a residential community to avoid this being an issue for people. There are residents who have sensory issues living with autism and ADHD and the additional noise will become a permanent challenge for them making their lives more difficult. This road is home to families, and a notional school and has a high number of elderly residents and to add the continued nuisance of noise from a substation to their lives is just unconscionable.

Vibrations

The Eirgrid report on vibrations correctly confirms that the land in this area was reclaimed in the 20th century and that the soil is poor for structural development. There is a genuine risk to the properties directly adjacent to this site with regard to damage to properties which already have structural issues due to subsidence. The terrace on East Wall Rd opposite to this site has a viable crack running right through the properties due to the poor foundations in this area. There is a significant risk that vibrations from construction will cause further damage to these properties. Vibrations nightly from trucks traveling on this road cause doors and radiators in these properties to visibly shudder and make a rattling noise. This added real concern of residents that their homes will be further damaged is a further reason why this site is not suited for this type of development in close proximity to a residential area.

Suitability of the Site

The scale of this development in comparison to the size of the site being 1 hectare means that it is at capacity which further intensifies the site and gives no allowance to develop a distance from the main road that would permit a less over industrialized development. This is compounded by the site being in very close proximity to a residential area, retail being units and a national primary school. The lighting, the high security demands, the over industrialization of the area with the development, the scale of the security perimeter 3-5m high with fencing that is hard in design, the serious emergency risk, the noise emitting from the development, construction traffic issues, subsidence in the area due to reclaimed land all make this to be a bad choice for this development. The Applicant who is owner of this site is choosing this site over other sites because of this ownership not because it is the most suited location. This has been cited by the Applicant at Section 4.3 of their paper titled IE000451A -CP1273 Dublin Central Grid Reinforcement Step 3 Report (copy of page included for ease of reference), East Wall Rd being referred to as location 1 is deemed low costs for Eirgrid as it is "owned by ESB with no anticipated stakeholder or compulsory purchase order." Compared to the other locations. The choice of location 1 East Wall Rd is not because of the suitability of the site but because it is the cheapest option.

The above noted report at page 19 of said document notes that location 1 being East Wall Rd as a mid/moderate rating on socio-economic analysis confirms that "there may be limited impacts on the residents of East Wall Rd and limited visual impacts apart from residents of dwellings and recreational users of boat and yacht clubs on the south side of the River Liffey". Here mid/moderate rating is referred to as being a limited impact which is not correct. The impact on residential dwellings is downplayed and the report reads as disingenuous. The biodiversity Flora and Fauna impact on East Wall Rd site is noted as low even though this site has been reclaimed by nature and wilding fauna at a two story level and is a visual amenity for the locality especially for the immediate residents opposite the site who have a view of this green space from the story story level and see directly into the site (this page is also attached for ease of reference).

A heavy industrialized development of this nature cannot be situated in a residential setting. Other commercial units in the area are set back from the road and are a fraction of the size of this development. This development is suited to an industrial zoned area such as in Dublin Port who are practiced in dealing with emergencies and hazardous chemicals and have the space to facilitate the security needs of this development and will have less of a negative visual impact. The documentation of the Applicant in relation to the selection of this site notes the residential impact as being similar to that of the Port which is not correct as the area of East Wall had 5,0000 residents prior to the development of the hotel on East Wall road, the refugee centre and the residential units along the East Road area which are in their 1000's. This site was chosen on the convenience of ownership. The necessity of this site is not based on the needs of this area. There needs to be a proper planning and sustainable development of this brown site and the needs of the area and the Applicant has failed to carry out a robust examination of alternative locations before a last resort location of this site being so close to a residential area and a national primary school. The needs to be a balance between the perceived necessity of serving the immediate area with ESB services and protection of long term impact visually on the local residents and the national primary school. As a brown site the government policy is to enhance public spaces and inspire

urban environment through greening initiatives which contribute to the livability of neighborhoods for sustainable connection to improve the quality of life of urban communities and have a better vision for our future.

Consultation

The consultation process for this development was disingenuous and residents on the East Wall Rd were not informed of the initial consultation process. Information of this meeting was circulated via a chat in the local cafe on East Rd. We were told that 5,000 leaflets were circulated however this was not the case, certainly not on the main rd. The proposal of this development came as a complete shock to the residents. At the consultation we were not furnished with a design or an understanding of the scale of this development. We were later issued with leaflets however the false information circulated by the Applicant is contrary to the requirement for a transparent consultation. The proposal for some "street art" as some sort of token to compensate for the life long negative impacts that this development will have of the local community is ridiculous.

Conclusion

This area requires affordable housing, nursing care facilities, open green spaces, and as main portal to the city from the airport and the tunnel it needs to be viewed as a sensitive area and upgraded with calming faculties not high long term impact industrialization to mostly benefit commercial entities. This proposed development will create an intensification of industrialization in a site which does not have the capacity to balance the need for more electricity with the requirements of the residents in the area, the safety concerns the long term visual impact which will affect the mental health of the residents in the area, the real or perceived health concerns, the permanency of additional noise even within permitted quotas can be unbearable for residents with noise and sound issues, the lost opportunity for this site to be used directly for local community to have an immediate positive impact on their future and to raise the morale and pride of residents living in this often overlooked community.

Is mise le meas,
Marion Murnane

Sub-Criteria	Location 1	Location 2	Location 3	Location 4
Expansion / Extendibility - 220 kV				
Overall Technical Performance				

The technical operating risk column evaluates the difficulty of accessing areas for maintenance activities, considering factors like proximity to railways, motorways, or major roads. It examines potential constraints that might hinder maintenance operations in the future.

Location 1 scored as mid-level/moderate for this sub-criterion, as while the site access through East Wall Road may be constrained from a traffic impact, there is available space for HV vehicles. Location 2, 3 and 4 all scored as moderate-high due to the access of the site through Port land, which will need to account for Port activities.

Regarding expansion/extendibility, the assessment evaluates the ease with which the project can be expanded or upgraded. For the 110 kV option, the evaluation looks at how many 110 kV circuits may feasibly be routed out of the substation site (assessed at a high level from available record data). For the 220 kV option, it examines the ease of looping in the second 220 kV circuit to the substation site.

Due to the high congestion of East Wall Road, which affects all the locations (once the circuits have left Port land from location 4), the expansion for 110 kV circuits is moderate-high for these locations. There is potential to locate up to 3 110 kV circuits in either direction on this road, however trefoil configuration may be required.

The high congestion on East Wall Road results in the moderate-high rating for the 220 kV expansion sub-criteria for location 1, 2 and 3. For these sites, from a high-level review, it is likely that trefoil arrangements and copper cables be required to locate the two 220 kV circuits in this road and reach the required rating. For this sub-criterion, location 4 is rated as mid-level moderate. This is due to the tie in to the second 220 kV circuit (Finglas - North Wall) being located approximately 800m through Port land. This is an easier tie in when compared to the other locations.

Overall, all locations are rated as moderate-high.

4.3 Deliverability Analysis

Table 4-3 summarises the deliverability performance of each location assessed in the Multi-Criteria Analysis. The three sub-criteria assessed at this stage of the project were the dependence on other projects, design complexity and implementation times for each location.

Table 4-3: Summary of deliverability analysis

Sub-Criteria	Location 1	Location 2	Location 3	Location 4
Dependence on other projects				
Design complexity				
Implementation Timelines				
Overall Deliverability Performance				

The dependence on other projects sub-criterion evaluates whether the project relies on the completion of other projects for its successful execution. Location 1, 2 and 4 all score low for dependence on other projects as there are no known current projects at these locations. Location 3

scores as moderate-high due to the Dublin Port Company's 3FM Project which aims to develop a road network through this site.

In terms of design complexity, the table assesses the level of complexity associated with the project's design, considering factors such as crossings, obstacles, or constraints that may complicate or impact the design. This includes compliance with specified ratings provided by EirGrid. Options are rated based on the relative complexity of their design requirements.

Location 1 scores as mid-level/moderate in terms of design complexity due to the need for a complex trenchless crossing of the M50 for the 220 kV tie-in, as well as the size and shape of the site adding to the design complexity. Location 2 scores at mid-level/moderate also due to the need for a complex trenchless crossing of the M50 for the 220 kV tie-in. Locations 3 and 4 scored as low-moderate as the circuit tie in to the primary 220 kV circuit identified as relatively accessible and the site size and geometry is appropriate.

The implementation timelines sub-criterion evaluates the anticipated timeline until energization, highlighting any significant differences among the options. At this stage one of the main differentiating factors between the sites is considered to be the current landownership status, which can influence project implementation. Location 1 is rated as low as the land is owned by ESB with no anticipated stakeholder or compulsory purchase order (CPO). The rest of the locations are rated as moderate-high as the land is owned by Dublin Port Company so land acquisition and stakeholder engagement would be required.

Overall, location 1 is rated as low-moderate. Locations 2 and 4 are rated as mid-level/moderate, while location 3 is rated as moderate-high.

4.4 Economic Analysis

Table 4-4 summarises the economic performance of each location assessed in the Multi-Criteria Analysis. The two sub-criteria assessed at this stage of the project were the project implementation costs and the project benefits of each location.

Table 4-4: Summary of economic analysis

Sub-Criteria	Location 1	Location 2	Location 3	Location 4
Project Implementation Costs				
Project Benefits				
Overall Economic Performance				

The Project Implementation Costs assesses the expenses associated with the procurement, installation, and commissioning of the transmission equipment necessary for the project. This includes all costs directly related to the project's scope, such as infrastructure and equipment expenses. At this stage, equipment considerations with all locations are considered to be similar. The differentiating factor for this sub-criterion at this stage is the costs associated with land ownership. Location 1 was rated as low as the land is owned by ESB. The rest of the locations are rated as mid-level/moderate as the land is owned by Dublin Port Company.

The Project Benefits evaluates the benefits derived from the project, including avoided costs and differences in constraint costs. Avoided costs may arise from factors such as the ability to export a forecast volume of generation, while constraint costs may result from the lack of capacity to meet certain demands. At this stage in the project, the main differentiating factor between the sites is the proximity to the existing 220 kV circuits circuit (for the first 220 kV tie-in). Locations 1 and 2 are rated mid-level/moderate due to the complex trenchless crossing of the M50 for the 220 kV tie-in.

Location 4 is also rated mid-level/moderate as the tie-in length is over 200m. Location 3 has the lowest rating of moderate-low as this site is directly adjacent to the proposed tie-in circuit.

Overall, location 1 is rated as moderate-low. The remaining locations (2, 3, and 4) are rated as mid-level/moderate.

4.5 Socio-Economic Analysis

Table 4-5 summarises the socio-economic performance of each location assessed in the Multi-Criteria Analysis. The four sub-criteria assessed at this stage of the project were the potential impacts on settlements and communities, amenity, cultural heritage and landscape and visual of each location.

Table 4-5: Summary of socio-economic analysis

Sub-Criteria	Location 1	Location 2	Location 3	Location 4
Settlements and Communities				
Amenity				
Cultural heritage				
Landscape & Visual				
Overall Socio-Economic Performance				

In terms of settlements and communities, the table assesses the expected impact of each option on residential, as well as current commercial activity onsite. Location 1 is situated in the residential and industrial area of East Wall, potentially affecting local residents and businesses. Locations 2, 3 and 4 were rated as high due to the current land use of the location being long term parking for imported cars, parking adjacent to Port Terminal 4 and parking for T11 Customs respectively. All three locations are within Dublin Port Company land.

Amenity considerations focus on the impact on recreational activities and tourism during and after construction. All the locations are rated low in this sub-criterion as they will have minimal to no impact on amenity areas.

Cultural heritage evaluation involves assessing the impact of each option on recorded cultural heritage resources. At this stage, from a high-level desktop review, all options were rated as mid-level/moderate as they do not contain any SMR's, ACA's or areas of known cultural heritage importance.

Finally, the assessment of landscape and visual factors considers landscape constraints, designated landscapes, and visual amenity. Location 2 and 4 were rated as low impact, with no expected loss of valued landscape elements or impacts on designated landscapes. Location 1 and 3 were rated as mid-level/moderate as there may be limited impacts on the residents on East Wall Road (location 1) and limited visual impacts apart from residents of dwellings and recreational users of boat and yacht clubs on the south side of the River Liffey (location 3).

Overall, all locations are rated as mid-level/moderate in terms of socio-economic impact.

4.6 Environmental Analysis

Table 4-6 summarises the environmental performance of each location assessed in the Multi-Criteria Analysis. The two sub-criteria assessed at this stage of the project were the potential impacts on biodiversity, flora and fauna and water impact of each location.

Table 4-6: Summary of environmental analysis

Sub-Criteria	Location 1	Location 2	Location 3	Location 4
Biodiversity, Flora and Fauna				
Water Impact				
Overall Environmental Performance				

The biodiversity, flora and fauna sub-criterion evaluates the potential impact of each location on biodiversity, including flora and fauna. Location 1, 2 and 3 received a rating of low, indicating no anticipated impact on biodiversity, flora, or fauna. Location 4 is rated mid-level/moderate as it is adjacent to the North Dublin Bay pNHA and SPA.

The water impact assesses the potential impact of each location on river crossings, lakes, and groundwater. Location 1 and 2 are rated low as there is no envisaged water impact in these locations. Location 3 was rated mid-level/moderate due to its proximity to Alexandra Basin, which forms part of Dublin Port. Location 4 is rated as moderate-high as it is adjacent to North Dublin Bay.

Overall, locations 1 and 2 are rated as low in terms of environmental impact. Location 3 is rated as low-moderate, while location 4 is rated as moderate-high.