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East Wall  
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The Secretary  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902  
Case reference: VA29N.323291

19<sup>th</sup> September 2025

Formal Objection to Proposed EirGrid Substation – East Wall

Dear Sir/Madam,

I am writing to formally object to the proposed development of a 220/110kV Gas Insulated Switchgear (GIS) substation at East Wall, Dublin (Case reference VA29N.323291).

While I recognise the strategic importance of upgrading the electricity grid, such projects must align with the principles of proper planning, sustainable development, and the objectives of the Dublin City Development Plan 2022–2028. This application fails on all three counts.

### **1. Direct Conflict with Z6 Employment / Enterprise Zoning**

The proposed substation site is zoned Z6 Employment/Enterprise, whose objective is “to provide for the creation and protection of enterprise and facilitate opportunities for employment creation.”

The Development Plan stresses that Z6 lands are a scarce strategic land bank for Dublin’s long-term economic growth, earmarked for employment, innovation, research, technology, and mixed-use developments integrated with residential and community amenities

Z6 areas are intended to advance the 15-minute city model, delivering sustainable jobs, green infrastructure, and services that improve live-ability.

A heavy industrial substation, 24m in height, does not generate employment, innovation, or public amenity. It sterilizes scarce central land that could otherwise accommodate housing, technology campuses, or mixed-use schemes of genuine community benefit.

By contrast, the Development Plan explicitly provides that Z7 zoning (Dublin Port) is the correct and preferred location for heavy utilities, industrial and infrastructural facilities. The proposal is therefore in breach of the Development Plan and misallocates land contrary to zoning objectives.



## 2. Misuse of Valuable City-Centre Land

Dublin is facing acute shortages in:

- Housing supply.
- Technology and enterprise space.
- Green infrastructure and open space.

The use of scarce Z6 land for a substation removes the opportunity for high-value, mixed-use, job-creating development. This is contrary to the common good and undermines city competitiveness, especially given the pressure on the housing market and employment land supply.

## 3. Proximity to Residential Community

The site is immediately adjacent to a long-established community.

Adverse impacts include:

- Potential health concerns linked to EMFs (despite compliance with baseline thresholds, international guidance advises against siting substations beside homes where alternatives exist).
- Continuous low-frequency noise.
- Visual intrusion at 24m height.

This is incompatible with both Z6 and residential amenity protection policies under the Development Plan.

## 4. Cumulative Burden on East Wall

East Wall has already borne disproportionate infrastructural loads, including:

- The Port Tunnel, with chronic noise and air pollution,
- Rapid residential intensification with no increase in green space.

The World Health Organisation has recognised the long-term health impacts of air quality degradation and environmental noise. Locating a 24/7 substation here further compounds an already inequitable burden on this community.

## **5. Availability of More Suitable Sites**

Dublin Port (Z7) lands provide abundant alternatives for a project of this type.

Z7 zoning explicitly facilitates industrial utilities and heavy employment uses.

Both EirGrid and ESB are semi-State entities and could secure appropriate land in Dublin Port through ownership, purchase, or compulsory acquisition.

There is no planning rationale for prioritizing ESB convenience over proper planning and zoning compliance.



BOXBAY by DP World offers new solutions for container storing and handling through its High Bay Storage (HBS) system. Using a system such as this can free up much of the space required. As an example, Dublin Port is made up of 260 Hectares of which approximately 12% is used for container and container management. This equates to 31 Hectares and by using an automated system will leave 25 Hectares available for uses such as the Eirgrid Sub Station.

## **6. Environmental and Safety Risks**

The application is incomplete without:

- A full geotechnical survey (risk of settlement/subsidence in reclaimed lands)
- Hydrogeological and contamination risk assessment (Tolka River and Dublin Bay)

connectivity).

- Independent EMF, noise, and air quality studies benchmarked to WHO standards.

Without these, the Board cannot properly assess whether the site is safe, sustainable, or compliant with EU directives.

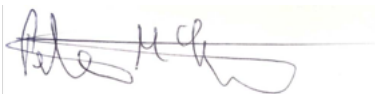
## **Conclusion**

This proposal is fatally flawed because:

- It contradicts Z6 zoning objectives, misusing scarce enterprise land needed for jobs, housing, and community facilities.
- It imposes severe adverse impacts on a long-established residential community already overburdened by infrastructure.
- It ignores clearly more suitable alternatives in Dublin Port (Z7).
- EirGrid and ESB, as semi-State bodies, have a heightened duty to serve the public interest. Prioritising convenience over community is unacceptable.

I respectfully urge An Bord Pleanála to refuse permission. If any consideration is given to approval, it must be conditional on relocation to Z7 (Dublin Port).

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Peter McCarthy', is written over a light yellow rectangular background.

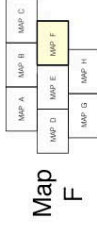
Peter McCarthy







# Dublin City Development Plan 2022-2028



## PRIMARY LAND USE ZONING CATEGORIES<sup>1</sup>

- Zone 21: Industrial (Manufacturing/Processing)
- Zone 22: Industrial/Professional (Commercial/Office)
- Zone 23: Industrial/Professional (Commercial/Office)
- Zone 24: City Centre (Urban Village)
- Zone 25: City Centre (Urban Village)
- Zone 26: Employment/Commercial
- Zone 27: Employment/Commercial
- Zone 28: Employment/Commercial
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- Zone 98: Employment/Commercial
- Zone 99: Employment/Commercial
- Zone 100: Employment/Commercial

## SPECIFIC OBJECTIVES

- 1. Map F is to be used in conjunction with the other objectives.
- 2. The objectives of the Development Plan are to be achieved by the implementation of the policies and measures set out in the Development Plan.
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John O'Hara  
Dublin City Planner

