

Sinéad Collins
1 St Barnabas Gardens
East Wall
Dublin 03

The Secretary,
An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1

Re: Observation on planning application for Strategic Infrastructure Development under section 182a of the Planning and Development Act, 2000 (as amended) comprising the development of a 220 / 110kv gas insulated switchgear (GIS) substation on a 1.124ha site at the ESB gateway car park and adjoining lands, East Wall Road, East Wall, Dublin 3. (EirGrid Capital Project 1273)

ABP-322217-25

Dear Sir/Madam,

I am writing as a resident of East Wall to formally object to the proposed development of a 220 / 110kv gas insulated switchgear (gis) substation at the ESB gateway car park and adjoining lands, East Wall Road, East Wall, Dublin 3. I have concerns about the impacts of this development on the local area. The reasons for my objection are as follows;

01. Zoning:

The Proposed Development is located on lands zoned 'Zone 6 - Employment / Enterprise'. The vision for this objective is:

"To provide for the creation and protection of enterprise and facilitate opportunities for employment creation."

The proposal provides no opportunity for enterprise or employment creation for the community of East Wall beyond its own construction.

02. Infrastructure and land use:

There is a significant deficit in the number of available housing units in Dublin, with supply not keeping pace with population growth and demand. This site is well serviced by public transport, in close proximity to the Clontarf dart station, the Red Luas line, Bus Connects Route (every 5 mins), Active Travel Route and the amenity of Dublin bay (UNESCO Biosphere). In my opinion this is an ideal location for residential development and I urge the board to reject the proposal on the grounds that residential development on this land would better serve the community of East Wall and the surrounding areas.

03. Public engagement report:

Section 4.4 summary of feedback. At the information event held in East Wall, the main comment observed was that people did not want to have a large substation developed in their community. In my opinion this is not reflected strongly enough in the feedback summary.

04. Alternate sites Multi Criteria Analysis:

"EirGrid approached DPC (Dublin Port Co) to discuss the viability of these lands. The strategic nature of the sites to DPC were outlined and it was evident that our proposed project was not compatible with DPC's own proposed plans. The fourth location identified as feasible was the DSO owned..."

The above extract is from the Public Engagement Report pp10. It appears that the site on the East Wall Road is identified as the 'Best Performing Option' solely because Dublin Port were not willing to accommodate the development on their lands. This is not a strong rationale for the siting of the proposed development. Dublin Port is an industrial area and is an entirely appropriate site for a substation (see development plan zoning). As such, the process of the multi criteria analysis as regards the choice of site is flawed.

05. Community gain:

Numerous off-site community gains were mentioned to the community at the public engagement session. I fail to see any community gains included in the current proposal. This is misleading the local groups and public representatives who attended these sessions. The Public Engagement Report references a Community Benefit Fund scheme that will be put in place for the Central Dublin Substation project. It is unclear to me how the local community is to participate in this scheme.

In light of the above concerns, I urge An Coimisiún Pleanála, to reject this proposal. I trust that community voices like mine will be carefully considered in the final decision.

Your Sincerely,

Sinéad Collins