From: Oliver O"Leary

To: <u>SIDS</u>

Cc: Shaun O"Brien

**Subject:** 323291-25 Dublin City Council submission **Date:** Wednesday 24 September 2025 14:48:59

Attachments: ACP-323291-25 - EIRGRID - 220110kV Gas Insulated Switchgear substation on East Wall Road in Dublin 1 -

DCC COMMENTS FINAL.pdf

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Dear Sir/Madam,

In response to your letter (signed by Ellen) dated 11<sup>th</sup> August 2025, please find submission from Mr. Brian Keaney, A/Deputy City Planner & Head of Development Management attached.

I would be obliged if an acknowledgement can be issued accordingly.

Kind regards,

Ollie

### Oilibhéar O'Laoire | Oifigeach Foirne Cúnta

An Roinn Pleanála, Maoine & Forbartha Eacnamaíochta | Comhairle Cathrach Bhaile Átha Cliath | Bloc 4 Urlár 0 | Oifigí na Cathrach | An Ché Adhmaid | Baile Átha Cliath 8 | Éire.

### Oliver O'Leary | Assistant Staff Officer

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Dublin City Council Observations in relation to the proposed development of a 220/110kV Gas Insulated Switchgear substation on East Wall Road in Dublin 1.

#### ACP-323291-25

#### INTRODUCTION

An application has been lodged with An Coimisiún Pleanála for a proposed development of a 220/110kV Gas Insulated Switchgear substation on East Wall Road in Dublin 1. An Bord Pleanála, as the consenting authority, will decide to grant or refuse this application.

### PROCEDURE:

The application has been lodged with An Coimisiún Pleanála under Section 182A of the Planning and Development Act 2000, as amended. The Proposed Development has been determined by ABP to be Strategic Infrastructure Development (SID) following the conclusion of a pre-application consultation process between ABP and EirGrid, in accordance with Section 182E of the Planning and Development Act 2000 (as amended). The application was lodged with An Coimisiún Pleanála on 7thJune 2024.

# PROPOSED DEVELOPMENT

The Proposed Development comprises of:

- Change of use from car park to electricity infrastructure;
- Demolition of existing buildings, structures and general site clearance;
- 1 no. 2-storey 220kV 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 110kV 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 220kV to 110kV 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;
- Ancillary car parking spaces including internal access roads;
- 2.6 m 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.

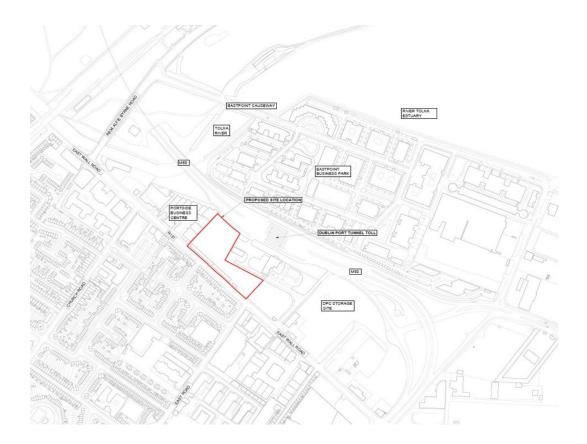
The proposed substation will tie into the existing Belcamp – Shellybanks 220 kV circuit which runs along the northern side of the M50 motorway. This connection does not form part of the proposed SID planning application.

#### Site Location:

The proposed 220/110kV Gas Insulated Switchgear substation is located on the R131 East Wall Road in Dublin 1. The R131 runs along the site's southwestern boundary with a high boundary wall fronting the public path. The site is bounded to the north and east by the M50 and the Port Tunnel Control building, to the northwest by the Portside Business Centre, and to the southeast by a brownfield site. A recently completed two way segregated cycle way also runs along the boundary of the site with East Wall Road by the Active Travel Unit. The submitted documentation indicates the site has an area of c. 1ha.

The subject site currently presents as an underutilised brownfield site, with a western portion used for car parking. The car parking facility was previously used by ESB employees during the construction/renovation of new offices off Merrion Square while ESB had temporary office facilities in the gateway building, East Wall Road.

It is noted in the documentation that the site is owned by the ESB and is located approximately 50msouth of the existing Finglas - Shellybanks 220 kV circuit which runs on the northern side of the M50/Port Tunnel.



#### **RELEVANT POLICY**

### **National Policy:**

# Ireland's National Energy and Climate Plan 2021-2030

Ireland's National Energy and Climate Plan 2021-20305 (NECP) was prepared to incorporate all planned policies and measures that were identified up to the end of 2019, which collectively deliver a 30% reduction by 2030 (from 2005 levels) of non-emissions trading system (ETS) greenhouse gas emissions. With regard for electricity infrastructure, the NECP commits to achieving the following goals by 2030:

- "Reduce CO2 eq. emissions from the sector by 50–55% relative to 2030 Pre-NDP projections;
- Deliver an early and complete phase-out of coal- and peat-fired electricity generation;
- Increase electricity generated from renewable sources to 70%, indicatively comprised of:
- at least 3.5 GW of offshore renewable energy
- up to 1.5 GW of grid-scale solar energy
- up to 8.2 GW total of increased onshore wind capacity
- Meet 15% of electricity demand by renewable sources contracted under Corporate PPAs".

## Government Policy Statement on Security of Electricity Supply

The Government Policy Statement on Security of Electricity Supply6 was published in 2021 and sets out a number of updates to national policy in the context of the Programme for Government commitments relevant to the electricity sector, planning authorities and developers. The policy statement notes that:

- "Ensuring security of electricity supply continues to be a national priority as the electricity system decarbonises towards net zero emissions;
- There is a need for very significant investment in additional flexible conventional electricity generation, electricity grid infrastructure, interconnection and storage in order to ensure security of electricity supply;
- In advance of the development of new conventional electricity generation capacity, there is a need to retain existing conventional electricity generation capacity in order to ensure security of electricity supply".

#### National Planning Framework - Project Ireland 2040

Project Ireland 2040 is the government's long-term overarching development strategy for the state. The National Development Plan 2021-203010 (NDP), which was updated on the 22nd of July 202511 and the National Planning Framework12 (NPF) combine to form Project Ireland 2040. The NPF sets the vision and strategy for the development of Ireland until 2040 and the NDP provides the enabling investment to implement that strategy.

The NPF includes several National Strategic Outcomes (NSOs) to guide development, with NSO 8 noting that "new energy systems and transmission grids will be necessary for a more distributed, more renewables focused energy generation system".

The NDP aims to deliver up to 80% of Ireland's electricity from a mix of onshore and offshore renewable sources by 2030. Achieving this ambitious target will necessitate a coordinated investment program in several key areas, including "an expanded and strengthened electricity transmission and distribution network."

As a part of the Powering Up Dublin project, the Proposed Development will contribute to strengthening key electricity infrastructure and enabling the city's grid to use and transmit the electricity generated from offshore wind energy to the heart of the city. This is a critical step to help Ireland transition to a low-carbon electricity future.

### **Regional Policy:**

## Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019-2031

The Eastern and Midland Regional Assembly's Regional Spatial and Economic Strategy, 2019-203114 (the RSES) outlines the spatial and economic policies and targets for the region. The RSES, prepared in accordance with the NPF, sets the context for each local authority within the Eastern and Midland Region to develop county and city development plans in a manner that will ensure that national, regional and local plans align. Regional Policy Objectives (RPOs) provide a framework for city and county development plans and align with international, EU and national policy.

Section 7.9 of the RSES relates to climate change and stresses the need to ensure that future development in the region will be transitioned to a low carbon usage. The following RPOs are of particular relevance to the Proposed Development:

RPO 10.20 - Energy Infrastructure: "Support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the Region and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this Strategy. This Includes the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity and gas transmission grid in a sustainable and timely manner subject to appropriate environmental assessment and the planning process."

**RPO 10.22 - Energy Infrastructure**: "Support the reinforcement and strengthening of the electricity transmission and distribution network to facilitate planned growth and transmission/distribution of a renewable energy focused generation across the major demand centres to support an island population of 8 million people."

**RPO 10.23 - Energy Infrastructure:** "Support EirGrid's Implementation Plan 2017 – 2022 and Transmission Development Plan (TDP) 2016 and any subsequent plans prepared during the lifetime of the RSES that facilitate the timely delivery of major investment projects subject to appropriate environmental assessment and the outcome of the planning process, in particular:

- Support reinforcement of the Greater Dublin Area between Dunstown and Woodland 400 kV substations to increase the capacity of the often congested and highly loaded Dublin transmission network to enable the transmission system to safely accommodate more diverse power flows and also facilitate future load growth in the area
- Support the installation of additional transformer capacity and increased circuit capacity to meet Dublin demand growth to strengthen the network for all electricity users and improve the security and quality of supply..."

**RPO 10.24 - Energy Infrastructure**: "Support the sustainable development of Ireland's offshore renewable energy resources in accordance with the Department of Communications, Energy and Natural Resources 'Offshore Renewable Energy Development Plan' and any successor thereof including any associated domestic and international grid connection enhancements."

Having regard for the above, it is highlighted that the Proposed Development forms part of the wider Powering Up Dublin Project, which is fully in accordance with, and supported by, the RSES's climate change and energy infrastructure RPOs. The Proposed Development will significantly improve electricity infrastructure and security of supply in Dublin, thereby supporting demand growth and facilitating greater amounts of renewable energy onto the network.

### **Dublin City Development Plan 2022-2028**

The *Dublin City Development Plan 2022-202815* (the CDP) serves as the key planning policy document for the Dublin City Council (DCC) administrative area and includes policy objectives and development standards for all development types. The aim of the CDP is to improve the quality of life for its citizens and ensure that Dublin City is an attractive place to live, work and visit. The following sections considers relevant polices and guidelines from the CDP as relevant to the Proposed Development.

### 6.1.5.1.1 Energy Infrastructure and Climate Action

Chapter 9 of the CDP relates to 'Sustainable Environmental Infrastructure and Flood Risk' and notes the following as a strategic issue: "facilitating the provision of critical energy utilities and the transition to alternative, renewable, decarbonised and decentralised energy sources". Relevant objectives regarding energy infrastructure are noted below:

SI49 - Support for Energy Utilities: "To support the development of enhanced electricity gas supplies, and associated transmission and distribution networks, to serve the existing and future needs of the City, and to facilitate new transmission infrastructure projects and technologies including those to facilitate linkages of renewable energy proposals to the electricity and gas transmission grid that might be brought forward in the lifetime of this Plan. In this respect, the City Council will have regard to the 'Guiding Principles' for facilitating the provision of energy networks set out by the Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy (2019-2031)."

SI51 - Renewable Energy Use and Generation: "To promote renewable energy generation, use and storage at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050."

SIO28 - EirGrid Development Strategy: "To support EirGrid's Grid Development Strategy - Your Grid, Your Tomorrow (2017), Implementation Plan 2017 - 2022 and Transmission Development Plan (TDP) 2016 and any subsequent plans prepared during the lifetime of this Plan, in order to provide for the safe, secure and reliable supply of electricity."

SIO30 - Facilitating Offshore Renewable Energy: "To support the sustainable development of Ireland's offshore renewable energy resources in accordance with the National Marine Planning Framework (2021) and Offshore Renewable Energy Development Plan (2019) and its successor, including any associated domestic and international grid connection enhancements."

# 6.1.5.1.2 Land Use Zoning Objectives

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

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

Under this zoning objective, a 'public service installation' is a permissible use. This use is defined in *Appendix 15 – Land Use Definitions* of the CDP as follows:

"A building, or part thereof, a roadway or land used for the provision of public services including those provided by statutory undertakers. Public services include all service installations necessary for electricity, gas, telephone, radio, telecommunications, television, data transmission, drainage, including wastewater treatment plants."

#### **Strategic Development Regeneration Area**

Chapter 13 of the CDP identifies 17 no. Strategic Development Regeneration Areas (SDRAs) and sets out the overarching framework and guiding principles for the future development of each these areas. The CDP notes that these SDRAs are capable of delivering significant quantities of homes and employment for the city and key supporting infrastructure.

The Proposed Development is located within the northern portion of 'SDRA 6 Docklands'. The CDP notes that all future land uses within this SDRA shall accord with the focused requirements of the relevant development plan zonings.

For each SDRA, a series of additional, area-specific guiding principles are set out and indicated on an accompanying plan. Of particular relevance to the Proposed Development are the following objectives that relate specifically to SDRA 6:

"To enhance public realm to accommodate increased pedestrian movement. To support public realm improvements in East Wall to enhance permeability and connectivity to the wider area".

### **Architectural and Urban Design Parameters**

Chapter 15 of the CDP sets out development standards and criteria to be considered in the development management process so that development proposals can be assessed both in terms of how they contribute to the achievement of the core strategy and related policies and objectives. Section 15.4.2 of the CDP has regard for architectural and urban design and notes that:

"Imaginative, innovative and contemporary architecture is encouraged in all development proposals, provided that it respects Dublin's heritage and local distinctiveness and enriches the city environment. Through its design, use of materials and finishes, development will make a positive contribution to the townscape and urban realm, and to its environmental performance.

Through the use of high quality materials and finishes and the appropriate building form, the architectural quality of development should positively contribute to the urban design and streetscape, enhancing the overall quality of the urban environment. In particular, development should respond creatively to and respect and enhance its context".

The CDP notes that underutilised lands and brownfield sites should be developed with consideration for the following inter alia:

- "To encourage innovative, high quality urban design and architectural detail in all new development proposals.
- To analyse and review the surrounding built environment to ensure the new development is consistent with the character of the area.
- To contribute to the streetscape creating active and vibrant public realm.
- To provide for appropriate materials and finishes in the context of the surrounding buildings.
- To carefully integrate appropriate landscape planting and trees and retain and ecological features on the site".

Section 15.5.7 of the CDP relates to materials and finishes and notes that developments the following are required of all new developments:

- "To ensure materials and finishes complement the existing pallet of materials in the surrounding area.
- Promote durability to ensure a good visual appearance over time.

The design and layout of buildings, together with the robustness of materials used in their construction, should be such as to discourage graffiti, vandalism and other forms of anti-social activity.

• To support the use of structural materials that have low to zero embodied energy and CO2 emissions as well as the use of sustainably sourced building materials and the reuse of demolition and excavated materials."

Section 15.6.13 of the CDP relates to boundary treatment and notes that:

• "Walls, fences, metal railings and gates used to define spaces and their usage all impact on the visual character and the quality of a development. These should be selected so as to be an integrated part of overall design".

# **PLANNING HISTORY**

2766/21: Permission granted for the continued use of a temporary surface car park to provide ancillary parking for ESB staff temporally located at the gateway building, East Wall Road. The proposed works also included minor alterations to the existing internal car park layout, reducing overall car parking capacity from 250 to 150 spaces.

Permission was also sought to retain all entrances, security gates, security hut, lighting, boundary treatments and all ancillary site works.

3052/16: Permission granted for a temporary surface car park for a period up to a maximum of five years comprising part of the ESB landholding to provide parking for staff temporally located at the Gateway Building, East Wall Road. The proposed works also included: the provision of 250 temporary car parking spaces; the temporary relocation of the vehicular and pedestrian entrance onto East Wall Road; works to the footpath at the entrance and new road markings on the East Wall Road; removal of a section of boundary wall and adjoining lean-to sheds; erection of security gates; security hut; lighting and all ancillary site; and development works.

5175/22: Permission granted for amendments to Reg. Ref. 3091/20 for a change of use of land and provision of an ESB substation, ESB Meter/Switch Room and all associated development.

#### **INTERNAL REPORTS:**

**Environment & Transportation Department** 

No objection subject to recommended conditions. Content of report included below.

Drainage: No objection subject to recommended conditions

Parks: A number of conditions recommended

### **PLANNING ASSESSMENT**

This is a Strategic Infrastructure Development for a new 220kV/110kV Gas Insulated Substation off East Wall Road. The Planning and Environmental Considerations Report submitted with the application notes that due to the ageing of Dublin's electricity infrastructure, the 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 220kV/110kV Gas Insulated Substation (GIS) has been identified as the best solution to address the city's growing electricity demand. This GIS will be looped into one of the existing 220 kV circuits in the North Inner City. It is noted that the new station will support:

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

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

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

Under this zoning objective, a 'public service installation' is a permissible use. This use is defined in Appendix 15 – Land Use Definitions of the CDP as follows: "A building, or part thereof, a roadway or land used for the provision of public services including those provided by statutory undertakers. Public services include all service installations necessary for electricity, gas, telephone, radio, telecommunications, television, data transmission, drainage, including wastewater treatment plants."

It is noted that lands surrounding the subject site are varied in terms of zoning, with lands to the northwest zoned for mixed uses, lands to the southwest zoned for residential uses and adjoining lands to the east zoned for enterprise and employment.

In this regard, it is considered that the Proposed Development is acceptable within the land use zoning objective for the subject site.

The Proposed Development is located within the northern portion of 'SDRA 6 Docklands'. The CDP notes that all future land uses within this SDRA shall accord with the focused requirements of the relevant development plan zonings.

While there are no SDRA objectives relating specifically to the subject site, East Wall Road is identified as a 'Core Pedestrian Spine', and roads linking to East Wall Road have been also identified for 'Access and Permeability'

It is argued 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.

# **Visual Impacts:**

The Proposed Development will introduce two substation buildings which are relatively large in scale into a receiving urban landscape comprised of residential and industrial land uses.

The proposed development provides for 2 new buildings, significant in scale with each building comprising a two-storey structure. The buildings will house the SF6 free (non SF6 gases) gas insulated switchgear comprising of insulated circuit breakers, disconnectors and other high voltage equipment.

The buildings will provide all necessary welfare facilities, office spaces, monitoring and control equipment required for the operation and maintenance of the substations. It is envisaged that both buildings will be steel framed, incorporating precast concrete floors and an insulated cladding system.

The proposed substation buildings have been located towards the public facing front boundary to assist in screening the associated transformers, car parking and other services to the rear of the site. The buildings themselves have been designed to incorporate architectural cladding and materials and finishes that break up the scale and massing of these forms and provide visual interest to the streetscape.

The Visual Impact Analysis submitted indicates that the greatest visual impact will be in the immediate vicinity of the site along East Wall Road, and that the development is unlikely to have significant impacts on long views.

The proposed 220kV substation is approximately 51.8m x 22.2m and 20m in height, while the proposed 110kV substation is approximately 51m x 15.9m and 16.5m in height. The buildings are of significant scale and are likely to have a significant visual impact on this part of East Wall. Concerns regarding the visual impact of the proposal were noted to the applicant during pre-application meetings. The applicant was advised that the design and finish of the proposal should demonstrate a positive contribution to the overall legibility of this part of East Wall and in this regard careful consideration of cladding, high quality materials for boundary treatment and planting were recommended.

The submission notes that 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.

It is also noted that 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.

## Landscaping and boundary treatment

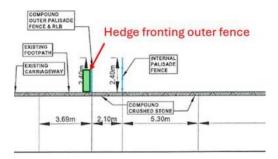
The documentation submitted with the proposal notes that landscaping and boundary treatment measures have been taken to soften the overall appearance of the site. The applicant was advised at pre planning stage that extensive landscaping and a high quality treatment of the boundary facing the public road would be required.

To the front of the site, it is proposed that security fencing is set back along the public boundary to create spaces for seating with tree planting carefully located for additional visual interest, urban greening and biodiversity.

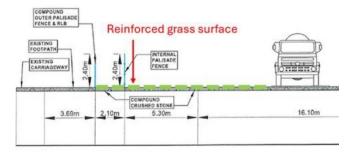
It is noted that the boundary treatment and planting designs have evolved with key security considerations in mind such as avoiding the potential for people climbing trees or using hedging to gain access to the property etc. It is further noted that due to the nature of the proposed development which is an unmanned electrical substation housing critical electrical infrastructure, the use of green walls on the GIS Substation buildings is not considered to be a feasible measure due to electrical safety and other technical and engineering constraints.

Comments have been received from the Parks Department in relation to the proposal.

 The proposal is located adjacent a suburban housing area and landscape treatment will assist to integrate the development into the locality, in particular Park Services recommend the introduction of a simple low hedge boundary fronting the street fence boundary.



2. Extensive crushed stone surfaces: there is the potential to surface these areas in a reinforced grass which will improve the visual appearance of the site, allow traffic and maintain open views, while eliminating dry weather blown dust from crushed stone finishes.





3. Green Buildings: The applicant should include vertical greening to building facades, in particular those facing public roads and local housing to help mitigate the large scale of the proposed buildings and introduce biodiversity habitat to the scheme. Please note DCC's Green Blue Roof <a href="https://www.dublincity.ie/sites/default/files/2021-12/dcc-green-blue-roof-guide-2021.pdf">https://www.dublincity.ie/sites/default/files/2021-12/dcc-green-blue-roof-guide-2021.pdf</a>







4. Fence design and colour: It is preferable to use a well-designed steel railing with a black or dark green on the public roadside outer boundary.

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.

### **Drainage**

The Drainage Planning, Policy and Development Control (DPPDC) section has no objection to this development, subject to a number of recommendations and the developer complying with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0.

### **Transportation**

The Transportation Planning Division has received several comments from Divisions within Environment & Transportation. The details of which are outlined hereunder:

### Traffic Division

The Transport Advisory Group (TAG) outlined that they have no traffic compliance comments regarding the proposed Substation @ East Wall Read.

# Active Travel Programme Office

It would appear from the drawings 2106 (on website) it is proposed to remove 40 metres of Active Travel delineator cycleway kerb to widen and improve the entrance and exit to the proposed development which appears excessive – 20 metres would be more appropriate, as any dilution of protection to the cyclist is not ideal.

I expect other departs / authorities will address concerns on the connections to existing Water & Combined sewers which will need full reinstatement amongst other things.

Inclusion of a condition for applicant to liaise with E&T for agreement on Active Travel as well as other public realm changes prior to commencement of works that would also satisfy us.

#### **Transportation Planning Division Comments**

Transportation Planning Division (TPD) had not had any prior discussions with Eirgrid PLC prior to lodgement of the application. TPD is generally supportive of the Project, further detail is required on several aspects in relation to changes to the public road from the project which can be addressed by way of condition.

# Site Location

The site is currently accessible from the East Wall Road (R131). The Proposed Development has public transportation links with the nearest bus stop being located in East Road approximately 200m away and the nearest DART and intercity train station located 1.2km away at Clontarf Road. 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 Eastpoint Business Park lies immediately to the north of the M50 and Port Tunnel which consists of numerous office buildings. The proposed development is connected to M50 motorway via the regional road R131 in the East and to the regional road R834 in the West. The site is currently in use as a temporary surface

car park for ESB Networks staff with an adjacent vacant brownfield site. The security-controlled surface car park has been in operation at the location since 2016.

### Site Access

The existing site access for vehicular traffic is directly at the junction of East Wall Road and Forth Road. The proposed site layout plan seeks to relocate this access to the south east in line with No. 168 East Wall Road. The proposed vehicular entrance is denoted at an overall with of 13.1m with a raised entry treatment and associated uncontrolled tactile pavement. The East Coast Trail two-way cycle way is provided along the northern side of East Wall Road. The proposed relocation of the vehicular entrance will likely impact on this infrastructure in this regard any may require works to the public road to allow for the relocation of the entrance. The applicant has provided a vehicle tracking drawing for heavy goods vehicles (HGVs) including a pumping appliance and an FTA Design Articulated Vehicle (2016).

# Public Roadway

The proposal seeks to provide for a number of trees planted in the public footway. The trees and their associated tree pits are denoted as standard trees in the proposed landscape drawing. The tree pits appear to be at footpath edge in this regard. It is unclear of the remaining unobstructed footpath width behind the trees. Given the proposed changes to the footpath are within DCC lands it is recommended the applicant liaise with Dublin City Council Environment & Transportation Section to agree the details of any works to the public road.

The subject site appears to outline 9 no. car parking bays with 5 no. to the south west of the proposed 220kV GIS building and 4 no. to the west of the proposed 110kV building.

The site is located within Zone 2 of the Dublin City Development Plan 2022-2028 Map J. This use does not align typically with the land use categories as set out in Table 2.0 of Appendix 5 which refers to car parking standards but may be considered similar to a manufacturing/warehousing use which allows for a maximum of 1 long-term space per 200 sq.m and no short-term spaces. The total on site operation and maintenance site offices including welfare facilities comprise an area of c.1149m2 for the 220kV Gas Insulated Switchgear sub-station and c.810m2 for the 110kV Gas Insulated Switchgear sub-station. The proposed quantum of car parking is therefore considered acceptable in this regard.

A Construction Management Plan has been submitted, given the location and size of the site an updated CMP should be conditioned for the duration of construction works. The provision of onsite cycle parking in order to facilitate travel by sustainable modes should be considered. The scheduling of traffic should be reviewed as part of a final CMP to ensure that traffic during peak hours are limited and impact on adjacent properties is limited.

### Air &Noise

Air Quality:

There are no significant effects on air quality anticipated as a result of the proposed development. The assessment methodology, mitigation and monitoring measures as detailed in Chapter 10 of the Planning and Environmental Considerations Report on Air Quality shall be adhered to in full. The cumulative effects of all activities on site shall be considered at all times. Should exceedances be recorded, the Air Quality assessment methodologies/mitigation measures shall be adapted to ensure limits are complied with.

#### Noise and Vibration:

The Planning and Environmental Considerations Report notes that three no. transformers are required to step down electrical power from 220 kV to 110 kV and these are the main sources of noise during the operation of the Proposed Development. BS 4142 describes methods for rating and assessing sound of an industrial and/or commercial nature, and this was used for assessing likely significant effects from the Proposed Development. The predicted noise impact at the nearest high sensitivity NSL without mitigation is medium, and the significance of effect is deemed to be significant during night-time periods. Mitigation in the form of transformer noise enclosures are recommended and have been incorporated into the design of the Proposed Development. With mitigation measures in place, predicted rated noise levels will be more than 10 dB below the current background noise levels and will meet the Neighbourhood Noise criteria in EirGrid Document Reference: XDS-GFS-00-001-R4 at the nearest NSL with noise levels below the numerical limits and tonal noise not likely to be perceptible during all periods. Hence, it is argued that no significant residual effects will arise as a result of the operation of the proposed development.

The assessment methodology, mitigation and monitoring measures as detailed in Chapter 12 of the Planning and Environmental Considerations Report on Noise and Vibration shall be adhered to in full. The cumulative effects of all activities on site shall be considered at all times. Should exceedances be recorded, the Noise and Vibration methodologies/mitigation measures shall be adapted to ensure limits are complied with.

### **Environmental Impact Assessment**

An Environmental Impact Assessment Screening Report has been submitted with the application. An Coimisiún Pleanála are the competent authority with regard to Environmental Impact Assessment and should therefore satisfy themselves regarding the adequacy of documentation submitted.

#### **Appropriate Assessment**

An Coimisiún Pleanála are the competent authority with regard to Appropriate Assessment and should therefore satisfy themselves regarding the adequacy of documentation submitted in this respect.

#### Conclusion

The proposed development is located in 'SDRA 6 Docklands', one of a number of SDRAs in the City Development Plan which is capable of delivering significant quantities of homes and employment for the city and key supporting infrastructure. The proposed development while critical for the city's growth will arguably prohibit any additional homes in this portion of the SDRA lands and is regrettable. However, it is acknowledged that the site has not been identified as an "Opportunity" site in the SDRA. Overall, 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.

#### RECOMMENDED CONDITIONS

The Planning Authority recommends that certain conditions be attached should An Coimisiun Pleanála be minded to grant permission for this development

1. Prior to commencement of development, final details of the materials, colours and textures of all the external finishes to the proposed substation buildings and all

boundary treatments, shall be submitted to, and agreed in writing with, the planning authority.

A panel of the proposed finishes to be placed on site to enable the planning authority to adjudicate on the proposals. Any proposed render finish to be self-finish in a suitable colour and shall not require painting. Construction materials and detailing shall adhere to the principles of sustainability and energy efficiency, and high maintenance detailing shall be avoided.

- 2. As soon as may be subsequent to permission granted, if An Coimisiun Pleanála is so minded, the applicant shall submit to the Planning Authority a communication plan for the overall project from pre-commencement through construction to operational stages. This shall include liaison details for engagement with the Local Authorities as well as the general public. All costs associated with the communication plan shall be borne by the applicant.
- 3. Prior to the commencement of the development, the works within the existing or proposed sections of public road shall be submitted to and agreed in writing with the planning authority. The applicant shall contact the Environment and Transportation sections of DCC to ascertain their requirements regarding all works to the public road and impact on the Active Travel route. Materials in public areas shall be in accordance with the document Construction Standards for Roads and Street Works in Dublin City Council. All works shall be completed prior to the occupation of the development and shall be carried out at the expense of the applicant.
- 4. Prior to commencement of development, and on appointment of a contractor, an updated Construction Management Plan shall be submitted to the planning authority for written agreement. This plan shall provide details of intended construction practice for the development, including traffic management, hours of working, noise and dust management measures and off-site disposal of demolition waste. The Construction Traffic Management Plan shall seek to minimise impact on the public road and potential conflict with pedestrians, cyclists and public transport.
- 5. All costs incurred by Dublin City Council, including any repairs to the public road and services necessary as a result of the development, shall be at the expense of the developer.
- 6. The Developer shall comply with the following drainage requirements of the Planning Authority:
  - The Drainage Planning, Policy and Development Control (DPPDC) section has no objection to this development, subject to the developer complying with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0.
  - The flood mitigation measures outlined in the Site Specific Flood Risk Assessment shall be implemented in full.
  - The development is to be drained on a completely separate foul and surface water system with surface water discharging to the surface water sewer network.
  - All surface water discharge from this development must be attenuated in accordance with the requirements of the DCC's Sustainable Drainage Design and Evaluation Guide 2021. The discharge rate shall be agreed with DCC prior to the commencement of construction.

- An appropriate petrol interceptor shall be installed. Please refer to section 20 of the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0.
- The development shall incorporate Sustainable Drainage Systems (SuDS) in the management of surface water. Full details of the surface water management proposals shall be submitted for approval prior to commencement of the development.
- The outfall surface water manhole and the outfall pipe from this development must be constructed in accordance with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0. The outfall manhole shall be located within the final site boundary.
- All private drainage infrastructure such as, downpipes, gullies, manholes, armstrong junctions, etc. shall be located within the final site boundary. Private drainage infrastructure is not permitted in public areas, or areas intended to be taken in charge.
- 7. Prior to commencement of development, a detailed specification of hard and soft landscaping including boundary treatments, car parking, fence design and colour should be submitted to, and agreed in writing with, the Parks and Landscape Services Division.

The agreed specification shall be fully implemented in the first available planting season following the substantial completion of the development.

- 8. The following requirements of the **Air Quality Monitoring & Noise Control Unit** shall be complied with:
- (i) The assessment methodology, mitigation and monitoring measures as detailed in Chapter 12 of the Planning and Environmental Considerations Report on Air Quality shall be adhered to in full. The cumulative effects of all activities on site shall be considered at all times. Should exceedances be recorded, the Air Quality assessment methodologies/mitigation measures shall be adapted to ensure limits are complied with.
- (ii) The assessment methodology, mitigation and monitoring measures as detailed in Chapter 10 of the Planning and Environmental Considerations Report on Noise and Vibration shall be adhered to in full. The cumulative effects of all activities on site shall be considered at all times. Should exceedances be recorded, the Noise and Vibration methodologies/mitigation measures shall be adapted to ensure limits are complied with.
- 9. The developer shall comply with the following requirements of Environment Heath Section of Dublin City Council.
- a) The construction of the development shall be managed in accordance with a Construction Management Plan. This Construction Management Plan shall be submitted to, prior to commencement of development. This plan shall be developed with reference to the Code of Practice for Construction and Demolition produced by the Air Quality Monitoring and Noise Control Unit of Dublin City Council.
- b) The hours of operation during the demolition and construction phase shall be restricted to 7.00am to 6pm, Monday to Friday, and 8.00am to 2.00pm on Saturdays. Permission to work outside of these hours must be subject to the approval of Dublin City Council.

- c) A noise assessment shall be submitted prior to the commencement of the work in accordance with B.S. 4142:2014. The assessment shall detail likely noise levels from all plant and equipment associated with the development. This assessment shall include mitigation of potential noise sources.
- d) Noise levels from the proposed development should not be so loud, so continuous, so repeated, of such duration or pitch or occurring at such times as to give reasonable cause for annoyance to a person in any premises in the neighbourhood or to a person lawfully using any public place. The rated noise levels from the site (defined as LAeq 1 hour) shall not exceed the background noise level as defined in B.S. 4142:2014 by 10 dB or more.

# **Community Benefit Fund**

Bian Keanery

10. Prior to commencement of development details of the proposed annual community benefit fund which will be released on a phased basis as the project progresses, shall be submitted to the planning authority for written agreement.

**Brian Keaney** 

A/Deputy City Planner & Head of Development Management

24 September 2025