

From: [Landuse Planning](#)
To: [SIDS](#)
Subject: Submission to Proposed 220/110kV Gas Insulated Switchgear (GIS) substation, at East Wall Road, Dublin 1, ACP-323291-25, (TII ref. TII25-132549)
Date: Monday 8 September 2025 12:55:15
Attachments: [TII25-132549 - Proposed 220-110kV Gas Insulated Switchgear \(GIS\) substation - East Wall Road, Dublin 1, ACP ref. VA29N.323291 issued 08.09.2025.pdf](#)

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Dear Sir/Madam,

Please find attached a copy of TII's observation on the above application.

Please acknowledge receipt of this submission.

Acknowledgements can be forwarded to landuseplanning@tii.ie.

Thanks and regards,

Cliona Ryan
Land Use Planner

Tel: +353 (0)1 646 0000

Email: landuseplanning@tii.ie



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An Coimisiún Pleanála
(Strategic Infrastructure Division)
64 Marlborough Street
Dublin 1

By email: sids@pleanala.ie

Dáta | Date

8 September 2025

Ár dTag | Our Ref.

TII25-132549

Bhur dTag | Your Ref.

VA29N.323291

RE: The development of a 220/110kV Gas Insulated Switchgear (GIS) substation, at East Wall Road, Dublin 1, County Dublin

Applicant: Eirgrid

Dear Sir /Madam,

Transport Infrastructure Ireland (TII) acknowledges receipt of referral of the above proposed *Central Substation Project* on behalf of Eirgrid.

TII welcomes and is supportive of proposals aimed at achieving *Project Ireland 2040* National Strategic Outcomes (NSO) including *NSO 8 Transition to a Low Carbon and Climate Resilient Society* and *NSO 9 Sustainable Management of Water and other Environmental Resources*. TII consider that individual projects should proceed where they are complementary to the requirements of official policy concerning maintaining the strategic capacity and safety of the national road network in accordance with *NSO 2 Enhanced Regional Accessibility*. Therefore, in the case of the above planning application, the Authority will rely on the Commission to abide by official policy in relation to development on/affecting national roads as outlined in *DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities* (2012), subject to the following matters:

The proposed development site is adjacent the Dublin Tunnel and Dublin Tunnel Control Centre. The Dublin Tunnel is a critical part of the national road network therefore its uninterrupted operation must be maintained throughout the construction and operation of the proposed development. TII acknowledges and recognises that this application is for the substation building and that the proposed cable connection to this substation that is to cross the M50 in proximity to the Dublin Tunnel portals is to be the subject of a separate future development consent application.

In accordance with *Project Ireland 2040* (NDP & NPF), as reflected in official national roads policy and in the *Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031* specifically at RPO 8.1, 8.2 and 8.3 is the requirement to protect the capacity, safety and efficiency of the existing national road network. The Dublin Tunnel forms part of the M50 and provides access to Dublin Port recognised as a Port of National Significance (Tier 1 Port) supported by RPO 8.21. The NTA *Greater Dublin Area Transport Strategy 2022-2042* in Measure ROAD2 sets out *National Roads Requirements* and explicitly includes provisions 1 and 9 for the protection of the strategic traffic function of the national roads network and the functions of the Dublin Tunnel.



Section 8.5.8 *Street/Road, Bridge and Tunnel Infrastructure* of Chapter 8 *Sustainable Movement and Transport* of the *Dublin City Development Plan 2022 – 2028* recognises the role and requirement for the protection of the M50 and Dublin Tunnel. TII would also remind the Commission that the existing access to the Dublin Tunnel Control Centre is a final vital emergency and diversion route for general, Authority and other Agencies to the M50, Dublin Tunnel and the wider motorway network.

TII observes that the proposed development is presented as a part of Eirgrid's *Powering Up Dublin Project*. TII has been engaged in consultation by Eirgrid in respect of the *Powering Up Dublin Project* generally as interactions will arise with the national road and light rail networks. TII has made prior observations on the *Powering Up Dublin Project* 'Initial Cable Route Options' in March 2023 (under TII ref. TII23-121865) and on proposed 'Best Performing Options' in July 2024 (under TII ref. TII24-126888). Eirgrid's intention to establish a Dublin Central Substation as part of the overall *Powering Up Dublin Project* was noted in TII's July 2024 submission (TII ref. TII24-126888) and consultation by Eirgrid in respect of appropriate construction methodology mitigation for proposed trenchless cable connection crossing at the sensitive Dublin Tunnel / M50 is ongoing (TII ref. TII25-130787).

The submitted Planning and Environmental Constraints Report (PECR) identifies an indicative construction programme of 36 months and in that PECR (section 4.2.11) commits that the appointed contractor will prepare a Traffic Management Plan "*...in consultation with and with the agreement of Dublin City Council, Transport Infrastructure Ireland (TII) and An Garda Síochána.*" TII notes the repeat of the commitment to a Contractor prepared Construction Traffic Management Plan (CTMP) as part of the submitted Outline Construction Environmental Management Plan (CEMP) also. However, the commitment to the contractor prepared CTMP in the outline CEMP appears without explicit record of requirement to prepare and execute same in consultation with TII.

The Dublin Tunnel constitutes a strategic national asset whose operations must be maintained uninterrupted during construction and operation of the proposed substation. The Dublin Tunnel Control Centre, access and emergency accesses exist adjacent the proposed substation site and there is a future high voltage cable crossing of the M50 to be designed, consented and constructed as part of the proposed Dublin Central Substation. Having regard to the location of the development site relative to the Dublin Tunnel and the Dublin Tunnel Control Centre, the potential for interruption of Dublin Tunnel service must be mitigated by avoidance. Therefore, TII recommends clear, embedded TII consultation in the formulation of the proposed Construction Traffic Management Plan (CTMP).

TII makes the following recommendations:

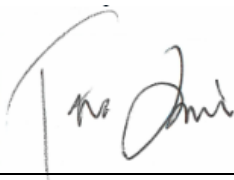
1. An updated Construction Environmental Management Plan (CEMP) and Traffic Management plan (TMP) shall be prepared and agreed with Dublin City Council and TII, prior to the commencement of development. The matters to be addressed in the CEMP and TMP relating to national road network maintenance and road safety shall include:
 - i. Demonstration of compliance with TII Publications (Standards) in accordance with relevant TII Publications (Technical) for any work that may impact the national road pavement, structures and infrastructure including drainage.
 - ii. Any proposed works to the national road network, including signage, to facilitate construction traffic shall comply with TII Publications and shall be subject to Road Safety Audit as appropriate. Works should ensure the ongoing safety for all road users and prior to any development necessary licenses, approvals or agreements with PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) Companies and local road authorities, as necessary, shall be in place.

- iii. Any damage caused to the pavement of the existing national road due to the turning movement of abnormal 'length' loads (e.g. tearing of the surface course) shall be rectified in accordance with TII Pavement Standards and details in this regard shall be agreed with the Road Authority prior to the commencement of any development on site.
- iv. Record of works specific indemnities, Section 53 consent and arrangements for third party access as arise following consultation with thirdpartyworks@tii.ie as due to separate structure approvals/permits, and other licences that may be required in connection with the proposed works, including where temporary modification to the road network may be required.
- v. In association with the above the applicant/developer shall consult with all PPP Companies, MMarC Contractors and road authorities over which the haul route traverses to ascertain any operational requirements such as delivery timetabling, etc. and to ensure that the strategic function of the national road network is maintained. TII requests referral of all proposals agreed between the road authority, PPP Concessions and MMarC Companies and the applicant impacting on national roads.

The foregoing matters and their reflection as part of the proposed development is essential to avoid detrimental impact on the capacity, safety, or efficiency of the national road network, is in the interests of sustainable development, and the promotion of an integrated approach to land use and transportation planning.

Please acknowledge receipt of this submission.

Yours faithfully,



**on behalf of
Land Use Planning Unit**