



# Walterstown 110 kV Substation

Response to Submissions (Case reference: ACP-324031-26)

April 2026

AN COIMISIÚN PLEANÁLA  
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# 1 Introduction

By letter dated 27 March 2026, An Coimisiún Pleanála has invited ESB (the 'Applicant'), to respond to the six submissions received by the Commission during the public consultation stage of the application (case reference: ACP-324031 -26) in relation to the proposed 'Construction of a 110kV substation and associated infrastructure at Walterstown, Dunboyne, County Meath'.

The six submissions received by An Coimisiún Pleanála from prescribed bodies and members of the public, are as follows:

1. Camillus Woolhead
2. Stasia & Derek Ennis
3. Terence Woolhead
4. Transport Infrastructure Ireland
5. Uisce Éireann
6. Meath County Council

In relation to the above submissions and matters raised therein, it is specifically highlighted that the planning application has been lodged fully in accordance with the provisions of the Planning and Development Act, 2000 (as amended), and that this process includes public engagement, as is represented by the submissions received.

The Applicant welcomes the opportunity to respond to the submission. Accordingly, this response addresses the matters raised in those submissions insofar as they are relevant to the proper planning and sustainable development of the area. Responses are limited to the matters raised in the submissions and structured thematically to avoid repetition. All responses are based on the information and assessments submitted as part of the planning application documentation, including the Planning and Environmental Considerations Report. Responses are provided in Section 2 of this response document.

## 2 Response to Submissions

### 2.1 Residential Amenity

#### 2.1.1 Visual/ Landscape

In the above regard, submissions raise concerns relating to the visual impact of the proposed substation and associated Line Cable Interface Masts (LCIMs), including their scale and proximity to nearby residential properties.

As set out in assessed in Chapter 12 of the Planning and Environmental Considerations Report (PECR), the site is located within a working rural landscape within the South East Lowlands Landscape Character Area, which is identified as being of moderate sensitivity and high landscape value.

In the above regard, the presence of existing vegetation (established vegetated field boundaries and treelines) which will be largely retained and supplemented by substantial native woodland and hedgerow planting, as illustrated in the Landscape Mitigation Plan (Drawing Number LD\_WLTSTWN\_LMP\_1.0), will successfully screen the proposed development, once planting has been established. This planting will provide effective screening of the substation compound and associated infrastructure in medium to long-term views. The Landscape and Visual Impact Assessment (LVIA) concludes that landscape and visual effects associated with the Proposed Development will be localised, limited in magnitude and readily mitigated, particularly once proposed planting becomes established (as depicted in VP3a and VP3b *Established Mitigation* photomontages, Appendix 12.1 of the PECR). Beyond approximately 500m from the site boundary, effects are generally imperceptible.

In the interest of clarity, it must be noted that one submission refers to LCIM towers as being in the order of 84-86m in height. As stated in the statutory notices, planning drawings and PECR, the proposed LCIMs will be approximately 17m in height. This is also illustrated within the Contiguous Site Elevation drawings (Drawing Number 229101684-MMD-00-XX-DR-C-0130).

Also, as detailed within the planning drawings the existing overhead line circuit will be only partially realigned to allow connection from the existing circuit to the proposed LCIMs. As such, these structures replace, and partly rationalise, existing 110 kV overhead line infrastructure within the site and do not introduce infrastructure of an unprecedented scale in this landscape context.

The existing Dunfirth-Kinnegad-Rhinawade 110 kV overhead line will be partially realigned and undergrounded within the site to facilitate connection to the proposed substation. The project therefore represents a consolidation of existing electricity infrastructure rather than the introduction of an entirely new linear element in the landscape.

Meath County Council notes that the palisade fencing proposed around the substation compound may be visually inappropriate in a rural setting. In response it is noted that such fencing is required for safety and security reasons; it is however also pointed out that the fencing will be substantially screened by existing boundary vegetation and new planting proposed as part of the development (as depicted in VP3a and VP3b *Established Mitigation* photomontages, Appendix 12.1 of the PECR).

### 2.1.2 Noise

Matters raised in the above regard, relate to potential noise emissions arising from the proposed substation, associated Line Cable Interface Masts (LCIMs) and the existing overhead line infrastructure.

Chapter 7 of the PECR assesses both the construction and operational noise effects arising from the proposed substation, in accordance with relevant Irish and international guidance. The Proposed Development incorporates Gas Insulated Switchgear (GIS) technology, which is fully enclosed and inherently quieter than traditional air-insulated equipment. Transformers will be located within concrete bunded enclosures and separated by purpose-designed fire walls, which also provide acoustic attenuation.

Operational noise modelling demonstrates that predicted noise levels at the nearest noise-sensitive locations will remain below relevant assessment criteria, and no significant adverse noise effects are anticipated during operation.

In relation to overhead line infrastructure, it is important to clarify that the 110 kV overhead line is an existing element of the electricity network in this location and will continue to operate at the same voltage following development. The Proposed Development does not introduce a new overhead line, nor does it involve an intensification of overhead line operation. The works comprise only a partial realignment and undergrounding of a short section of the existing circuit to facilitate connection to the proposed substation.

Accordingly, the operation of the existing 110 kV overhead line is not expected to give rise to any significant noise effects, and no material change in noise environment is anticipated as a result of the Proposed Development. Construction noise will be temporary and managed in accordance with best practice mitigation measures as set out in the Construction and Environmental Management Plan (CEMP).

## 2.2 Project Splitting

Submissions suggest that the Walterstown 110 kV Substation forms part of a single, integrated energy project and that it has been inappropriately advanced as a standalone application, resulting in project splitting.

The Applicant does not accept this assertion. As is clearly set out in the PECR, the Proposed Development is a standalone electricity transmission and distribution substation, required to address identified capacity and security-of-supply constraints within the existing electricity network. It does not form part of a single integrated development requiring a combined application, nor does it depend on or facilitate any specific generation project forming part of a wider scheme requiring combined consent.

There is no associated linear grid connection of strategic scale (it is specifically highlighted that in this regard, connection to the national grid is via the **existing** overhead line circuit), no integration with multiple generation project, and no reliance on future or separate consents to render the development operational. All works necessary for the delivery, operation and mitigation of the proposed substation are fully contained within the application now before the Commission.

Potential cumulative effects have been assessed in the PECR, including thorough review of relevant permitted and proposed developments within the appropriate study areas. Section 2.8 of the PECR notes that no significant cumulative effects are anticipated for any environmental chapter within the PECR.

## 2.3 Design Flexibility / Lack of Project Definition

Submissions further purport that the Proposed Development suffers from excessive design flexibility or a lack of project definition, alleging uncertainty in respect of voltage level, technology choice and associated infrastructure.

In this regard, it is material to note that significant portions of the wording used in the relevant submissions closely mirror, and in several instances appear to be directly replicated from, objections previously made in relation to a separate Strategic Infrastructure Development (SID) proposal for the Ballyloo Electricity Substation in County Carlow (ACP Case Ref's. 323860 and 321858). This separate Ballyhoo substation project involved materially different characteristics, including alternative voltage ranges (110 kV or 220 kV), alternative switchgear types (AIS or GIS), extensive underground grid connections in excess of 8km in length, and direct integration with multiple permitted and proposed solar developments.

The above outlined project characteristics, which also form part of submissions received, do not arise in the context of the Walterstown Substation development proposal. The planning application documentation clearly defines and sets out the Proposed Development – specifically this relates to a 110 kV/ 38 kV MV Gas Insulated Switchgear substation, with no alternative voltages, no alternative switchgear technologies and no optional routing or layout parameters proposed. All principal elements, including voltage level, switchgear type, site layout, building footprints and heights, access arrangements, drainage strategy and landscaping proposals are all clearly defined within the planning application and assessed in full within the PECR.

No reliance is placed on future decisions by third parties to determine the fundamental characteristics of the development, nor is permission sought in an open-ended or parameterised form. No open-ended flexibility is proposed that would undermine environmental assessment or public participation. Accordingly, the assertions of 'fundamental uncertainty' or 'excessive design flexibility' do not arise and appear to relate instead to circumstances specific to a different project altogether.

The Proposed Development before the Commission is therefore clearly and sufficiently defined for the purposes of assessment, public participation and decision-making, in accordance with proper planning and sustainable development.

## 2.4 Ecology

### 2.4.1 Survey Scope and Methodology

In relation to matters raised relating to the adequacy of ecological surveys, potential impacts on birds, bats and other protected species and hedgerow removal, it is highlighted that Chapter 8 of the PECR sets out a comprehensive ecological assessment undertaken by suitably qualified ecologists, in accordance with best practice. This includes desk studies, aerial imagery review, field surveys and consultation of National Biodiversity Data Centre records.

The site was identified as comprising intensively managed agricultural grassland bounded by established hedgerows and treelines, with no rare or protected habitats present. No European or Nationally designated conservation sites are located within or immediately adjacent to the application site, and the proposed development is not hydrologically or functionally connected to any European site.

Having regard to the above-outlined baseline conditions, the scope of surveys undertaken, including habitat and species appraisal, was considered appropriate, proportionate and sufficient to inform a robust assessment of likely ecological effects.

## 2.4.2 Birds

The PECR confirms that the site does not support habitats of high ornithological importance and does not lie within or adjacent to any designated SPA or key bird corridor. Bird usage of the site is consistent with that anticipated for an intensively farmed grassland landscape with boundary hedgerows, supporting common and widespread species.

The site was outlined in some submissions as hunting grounds for Merlin, Kestrel and sparrowhawk. Sparrowhawk and Kestrel are relatively widespread raptor species and it is expected that the proposed development will have no impacts on these species and they will continue to forage in the local area including habitats retained around the boundary of the site. Possible nest features such as trees will be retained within the site boundary and additional tree planting will benefit sparrowhawk (a woodland species) in particular.

The site is not suitable for breeding Merlin (Annex 1 listed). This species nests in upland moorland and forestry including the Wicklow Mountains which are likely the closest important breeding population to the site. Merlin may turn up occasionally during the winter but intensively managed fields and grasslands like the site are widespread in the area, with abundant alternative foraging habitat. No residual impacts will arise to Merlin or other birds from the proposed development.

The Proposed Development does not give rise to habitat loss or fragmentation of a scale that would adversely affect bird populations, nor does it introduce collision risk beyond that associated with the existing overhead line infrastructure already present on site. Accordingly, no significant effects on bird populations are predicted.

## 2.4.3 Bats and Other Protected Species

The PECR identifies that no buildings, mature trees or features with high bat roost potential will be removed as part of the Proposed Development. Boundary hedgerows will be largely retained and supplemented, maintaining commuting and foraging connectivity across the landscape.

Standard best practice mitigation measures are proposed, including timing of vegetation clearance outside the summer period where practicable, pre-construction ecological checks, and the appointment of an Environmental Clerk of Works (EnCoW) to oversee sensitive works. With these measures in place, the PECR concludes that no significant impacts on bats or other protected species are anticipated.

## 2.4.4 Hedgerow Removal and Habitat Fragmentation

Limited hedgerow removal is required solely to facilitate the site access. All hedgerow removal has been minimised through design iteration, and affected sections are of common species composition and local importance only.

Importantly, the Proposed Development incorporates substantial landscape and biodiversity enhancement measures, including the planting of approximately 0.5 hectares (5,000m<sup>2</sup>) of native woodland planting within the site. This greatly exceeds any required/ proposed hedgerow loss (approximately 54m<sup>2</sup>) and will result in a new gain in habitat diversity and ecological value, strengthening habitat connectivity across the local landscape.

## 2.4.5 Cumulative Effects

The PECR considers cumulative effects by reference to other relevant permitted and proposed developments within the ecological study area. Given the small footprint of the Proposed Development, the absence of sensitive habitats or species, and the distance to designated sites, the assessment concludes that no significant cumulative ecological effects arise, either

alone or in combination with other developments. Section 2.8 of the PECR notes that no significant cumulative effects are anticipated for any environmental chapter within the PECR.

#### **2.4.6 Appropriate Assessment**

An Appropriate Assessment Screening exercise has been undertaken and is submitted with the planning application documentation (and is also reported on in the PECR). This concludes that, having regard to the nature and location of the Proposed Development, there is no potential for likely significant effects on any European site, either alone or in combination with other plans or projects. Accordingly, the need for a Natura Impact Statement does not arise.

#### **2.4.7 Conclusion on Ecology**

In summary, the ecological assessment undertaken for the Proposed Development is proportionate, robust and consistent with best practice. The PECR demonstrates that potential ecological effects are localised, temporary in nature and adequately mitigated through avoidance, design measures and standard construction controls. With the inclusion of proposed landscape and biodiversity enhancements, the Proposed Development will not result in significant adverse ecological effects and is consistent with principles of biodiversity protection and enhancement.

### **2.5 Fire Risk, Pollution and Emergency Response**

#### **2.5.1 Fire Risk**

Matters raised in relation to the above, focus on fire risk associated with oil-filled transformers, SF<sub>6</sub> gas, fire-water runoff and emergency response capacity. The Proposed Development incorporates standard, industry-accepted fire prevention, containment and pollution control measures, as detailed in Chapters 3, 6 and 9 of the PECR.

These include:

- All power transformers will be located within raised concrete bunds (PECR Chapter 3, Section 3.3.5).
- Transformers will be separated by purpose designed fire walls (c. 5.5m high) to prevent fire propagation and radiant heat transfer between units (PECR Chapter 3, Section 3.3.1).
- The GIS equipment will be fully enclosed, and sulphur hexafluoride (SF<sub>6</sub>) handling, monitoring and maintenance will be governed by recognised international standards (including the BS EN 62271 series), with leak detection and controlled handling forming part of normal operational procedures (PECR Chapter 6, Section 6.6).
- A SuDS-based drainage system with impermeable lining and emergency shut-off capability (PECR Chapter 3, section 3.3.5).

These measures materially reduce both the likelihood and consequences of fire incidents and are consistent with best practice for transmission and distribution infrastructure.

#### **2.5.2 Site-specific Firewater Runoff and Pollution Pathway Assessment**

The PECR and supporting Surface Water Management Plan (SWMP) provide a site-specific assessment of pollution pathways and containment measures, including for low-probability, high-consequence events.

This includes:

- Chapter 9 (Surface Water Resources and Flooding) of the PECR and Appendix 3.1 identifies all potential surface-water pathways and incorporates a controlled SuDS-based drainage network.
- Transformer bunds will be fitted with oil-water separation systems to prevent discharge of contaminated water to the wider drainage system (PECR Chapter 3, Section 3.3.5).
- The attenuation basin will be impermeably lined, preventing infiltration of contaminated water to groundwater (PECR Chapter 3, Section 3.5 and Appendix 3.1).
- The drainage system will include emergency shut-off valve chambers upstream and downstream of the attenuation basin, allowing full isolation of the system in the event of an incident, including transformer fire or firefighting activity (PECR Chapter 3, Section 3.3.5).

These measures ensure that, even in a worst-case scenario, contaminated firewater can be contained on-site pending appropriate removal and disposal.

### **2.5.3 Emergency Response Capacity and Consultation with the Local Fire Authority**

Vehicular access to the site has been designed to accommodate emergency vehicles. The Proposed Development vehicular access, via a new site entrance and internal circulation access, has been designed in accordance with national geometric standards, ensuring access for emergency vehicles (PECR Chapter 3, Section 3.3).

Additionally, a Construction Environmental Management Plan (CEMP) accompanies the application and includes an Emergency Incident Response Plan, setting out procedures for spills, fire and pollution incidents, including notification of statutory authorities.

## **2.6 Conflict with Policies and Zoning of Meath County Development Plan**

As is identified in Chapter 2 of the PECR, the site is zoned 'RA-Rural Area', within which utility structures and electricity infrastructure are permissible. Meath County Council, as Planning Authority, confirms that the Proposed Development site is zoned 'RA- Rural Area' under the Meath County Development Plan 2021-2027 (MCDP). The zoning objective seeks to protect and promote the rural landscape while allowing for appropriate rural-related development and infrastructure. As recognised by Meath County Council, utility structures, including electricity infrastructure, are permissible within this zoning and the proposed development is thus considered acceptable in principle, subject to design, mitigation and compliance with relevant standards.

The Proposed Development accords with the MCDP's Infrastructure Strategy, including policies which support the provision, reinforcement and upgrading of electricity transmission and distribution infrastructure to meet existing and future demand and to facilitate the transition to renewable energy and grid resilience. In particular, the proposal aligns with Development Plan policies that support enhanced electricity networks, cooperation with statutory infrastructure providers, and the delivery of grid infrastructure necessary to support economic growth, population expansion and climate action objectives.

In terms of environmental protection and rural amenity, the Proposed Development has been designed to minimise its footprint and effects through careful siting, consolidation of existing overhead line infrastructure, underground cabling, landscape mitigation and biodiversity enhancement measures.

The accompanying PECR demonstrates that potential impacts on landscape character, residential amenity, ecology, traffic and water management are localised and can be adequately

mitigated, consistent with Development Plan objectives relating to landscape protection, biodiversity, surface water management and sustainable development in rural areas.

Accordingly, the Proposed Development is considered to comply with the zoning provisions and relevant policies and objectives of the Meath County Development Plan and represents appropriate and necessary infrastructure development in a rural location, in the interests of the proper planning and sustainable development of the area.

## 2.7 Traffic

### 2.7.1 Construction Traffic

Matters raised in the above regard relate to construction traffic volumes and duration, the suitability of Jarretstown Lane to accommodate increased vehicle movements, potential disruption to local residents and walkers and ongoing operational traffic associated with the proposed substation. These matters have been comprehensively assessed in Chapter 13 (Traffic and Transport) of the PECR which accompanies the planning application.

Concerns are raised in submissions that construction traffic will be significant in volume and will persist over a period of two to three years, resulting in prolonged disruption to local residents and users of Jarretstown Lane. As set out in Chapter 13 of the PECR, construction of the Proposed Development will comprise two principal phases: a civil construction phase of approximately 12 months, followed by electrical installation and commissioning works over a further period of approximately 18 months. Importantly, the construction traffic generation is not continuous or uniform over this entire period and is concentrated primarily during the early stages of the civil works.

The peak construction traffic period relates to the initial civil works, during which imported stone and concrete materials are delivered. During this peak period, traffic is forecast to be approximately 30 Heavy Goods Vehicles (HGVs) per day (60 movements), together with construction staff vehicles. This peak period is temporary and front-loaded, and traffic levels reduce significantly following completion of the bulk civil works.

Outside of peak periods, construction traffic volumes will be substantially lower and intermittent in nature. During the later electrical installation and commissioning phase, traffic is predominantly associated with light goods vehicles and staff movements, with no regular HGV activity.

Construction traffic routing has been assessed and is proposed to access the site via regional roads connecting to the M3 motorway, thereby minimising travel through local roads where practicable. The management of construction traffic will be controlled through the implementation of the Construction Phase Traffic Management Plan (TMP), forming part of the CEMP. The TMP will be a live document and will set out measures including traffic routing, scheduling of deliveries, management of abnormal loads, signage and communication with local residents.

It is highlighted that neither Meath County Council nor Transport Infrastructure Ireland raised any objection, in principle, to the Proposed Development on traffic grounds, subject to the conditioning of appropriate traffic management measures. The Applicant acknowledges that matters such as refinement of traffic management arrangements, abnormal load delivery protocols and localised mitigation measures can be addressed prior to commencement, by condition.

### 2.7.2 Operational Traffic

Submissions also state that the completed substation will give rise to ongoing traffic impacts, affecting the ability of residents and walkers to use Jarretstown Lane as they currently do.

As confirmed in Chapter 13 of the PECR, the operational traffic associated with the substation is minimal. Once operational, the facility will typically generate approximately two vehicle movements per week. These are associated with routine inspection and maintenance.

There will be no permanent staffing of the substation and no regular HGV movements during the operational phase. Accordingly, operational traffic is negligible in the context of the existing local road network and will not materially alter existing traffic conditions or the use of Jarretstown Lane by residents, pedestrians or recreational users.

### 2.7.3 Access and Sightlines

The drawings submitted which indicate the sightline visibility splays and required setback of 2.0m (Drawing Number 229101684-MMD-00-XX-DR-C-0150), have been undertaken and produced strictly in accordance with the most recent TII standards document DN-GEO-03060 (published in May 2023), the relevant visibility measures table of which (Table 5.4), is copied hereunder.

**Table 2.1: 'x' Distances on the minor road for visibility measurements (Table 5.4 from DN-GEO-03060, p. 46)**

Major road use	Minor road use	Standard	'x' Distance(m)
All roads	All junctions and accesses, Stop control	Desirable Minimum	3.0
All roads	Cycle Route	Desirable Minimum	4.0
National roads	Simple Junctions, Stop control	Relaxation	2.4*
Regional & Local Roads	All junctions and accesses, Yield control (where there are no relaxations associated with the junction layout)	Desirable Minimum	Max. 9.0
Regional & Local Roads	Accesses, Lightly trafficked	Relaxation	2.0
All roads	All junctions and accesses	Desirable Maximum	9.0

As may be noted in the relevant planning drawing extract provided below (**Error! Reference source not found.**), a short section of the visibility envelope marginally overlaps the existing hedge with regard to creation of the proposed entrance. Any such hedge obstructing visibility will be removed/ cut back to create the entrance – the sightline drawing illustrates that no hedge removal is specifically required to achieve sightlines. This is also noted in Chapter 8, which states that a 27m section of hedgerow will be required to be removed to facilitate sufficient sightlines and width requirements **for the new entrance**. It should be noted in this regard, that in relation to neighbouring trees which are also indicated on the drawing, the drawing represents the canopies of these trees and visibility sightlines would still be available at the required heights.



- Compliance with the Greater Dublin Strategic Drainage Study (GSDSDS) and the Greater Dublin Regional Code of Practice for Drainage Works.

In relation to the above, it is noted that these are standard requirements and are capable of being addressed by condition, although the Applicant can confirm and highlights the fact that the drainage strategy proposed and assessed in Chapter 9 of the PECR, together with the Surface Water Management Plan, and the associated Planning Drawings, provides a SuDS-compliant system consistent with the Greater Dublin Strategic Drainage Study.

## 2.9 Development Contributions/Community Fund

The submission from Meath County Council requests that a Section 48 development contribution be applied to the Proposed Development in accordance with the Council's Development Contribution Scheme and invites the Applicant to consider providing a community based education or awareness initiative. The Council do not however prescribe a legal basis, quantum or condition-triggered requirement for either measure, nor does it raise an objection in relation to same.

In the above regard, it should be noted that the Proposed Development is a Section 182A application which has been made under Part XI of the Planning and Development Act, 2000 (as amended), where there is no mechanism for local authority Contribution Schemes to be attached to grants. As such, ESB would request that ACP do not attach a condition requiring payment of Development Contributions, should permission be granted.

In response to Meath County Council's request to consider the imposition of a community-based or awareness initiative (community fund) condition, the ESB notes that such an invitation is discretionary in nature and considers the attachment of such an associated conditions to be unnecessary in the context of the Proposed Development. The project is strategic electricity network infrastructure designed to improve continuity of electricity supply and facilitate the integration of renewable energy for the wider region. As part of its statutory role, the ESB already undertakes a range of national and local campaigns and schemes to promote energy efficiency, renewable energy and climate awareness across the country.

In these circumstances, a site specific or localised community fund or awareness programme is not considered necessary or appropriate, and the ESB respectfully requests that An Coimisiún Pleanála does not attach a condition requiring a community gain fund or similar initiative.

## 2.10 Other Matters

Uisce Éireann has reviewed the Proposed Development and raises no objection to same.

It is noted however that Uisce Éireann's submission, states that the planning application does not include for new water / wastewater connection. In this regard, the Applicant notes that the development does not require connection to the public wastewater network, with foul effluent managed via an on-site holding tank to be emptied by a licenced contractor, as set out in the application documentation. In relation to water supply, any requirement will be limited in scale and met via the public mains, in accordance with the details provided in the SID application form. In this regard, it is also noted that section 3.3.4.1 of the PECR states that a new potable water supply is required for proposed welfare facilities (toilet and hand wash basin) within the GIS building. Potable water supply for the GIS building is proposed to be sourced via a new connection from the existing public watermain located within Jarretstown Lane, subject to connection request application to Uisce Éireann.

A Confirmation of Feasibility (CoF) was received from Uisce Éireann on 12 November 2025 (pre-connection enquiry reference CDS25007947), as provided in Appendix 3.2 of the PECR.

The potable water demand will be relatively low as the proposed substation will normally be unmanned and operated remotely.

The Applicant notes and accepts the standard advisory comments provided by Uisce Éireann in relation to the protection of existing assets. In the event that works are proposed in proximity to any Uisce Éireann infrastructure, consultation will be undertaken in accordance with standard practice.

### 3 Conclusion

The Applicant has carefully considered all submissions received and has addressed all relevant planning and environmental matters raised. The Proposed Development has been designed to minimise environmental effects, is supported by a comprehensive PECR, and accords with national, regional and local planning policy objectives.

