

From: [O'Connell, Amy \(Engineering and Major Projects\)](#)
To: [SIDS](#)
Subject: ACP Case No. 324276-26 ESB Response to Submissions
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Good afternoon,

Please see attached response to the submissions received on the proposed Belmayne 110 kV Substation in North Dublin City.

Please confirm receipt of this submission.

Kind regards

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**An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902.**

13th August 2026

**Re: Response to submissions in relation to the proposed development comprising a
110 kV/ 38 MV substation on the R139, Belmayne, Clonshaugh, Dublin 17
ACP Case No. 324276-26**

A Chara,

1. Introduction

On behalf of the Electricity Supply Board (ESB), I refer to the above case number and in particular to correspondence received from An Coimisiún Pleanála (ACP) dated 21st July 2026, inviting a response to the copy of submission received on the application.

Submissions were received from:

- Dublin City Council
- HSE
- Inland Fisheries Ireland
- NPWS (DHLGH Development Applications Unit)
- Transport Infrastructure Ireland
- Uisce Éireann

Generally, the issues raised in the submissions have already been considered in the Planning and Environmental Documents and are addressed by mitigation measures or will be addressed during the detailed design and construction stages for this project, as is common for projects of this nature. The specific submissions are responded to below.

2. Response to Submissions

2.1. Dublin City Council

The submission from Dublin City Council (DCC) sets out the context of the site, relevant planning policy, planning history and provides an overall assessment of the proposed development. **DCC have recommended that ACP grant permission** subject to 7 no. conditions. ESB's response to the proposed conditions is outlined below:

Condition 1: ESB notes this proposed condition and has some comments on the following points:

Suggested Condition	ESB Comment
<i>Condition 1 (iv) There shall be provision made for bat boxes and bird nest boxes within the landscape scheme, details to be agreed in writing prior to the commencement of development</i>	Given the electrical nature of the proposed development, the installation of bat or bird nest boxes within or immediately adjacent to the substation compound would not be appropriate. However, ESB is agreeable to the provision of bat and bird nest boxes along the outer perimeter of the development site, particularly within the proposed landscaped areas along the northern and western boundaries. The details of such can be agreed with the planning authority prior to the commencement of the development.
<i>Condition 1(viii) The river corridor lands will be protected from impacts as a result of the development works, except for permitted landscape works in accordance with the agreed landscape scheme. Prior to construction a temporary protection fence with appropriate signage will be erected along the public open space boundary and storage of materials, vehicular access, disposal or dumping of materials/waste/spoil, liquid run-off, soil excavation and vegetation clearance will be prohibited within the protected area. Prior to development the details and alignment of the protection fence will be submitted to the Planning Authority for written agreement.</i>	ESB notes and has no objection to the proposed condition requiring the installation of a temporary protection fence along the northern site boundary, with the final alignment to be agreed with the Planning Authority. As outlined in Section 5.4.1.2 of the AA Screening Report, excavations within 25 m of the watercourse will be limited to the foul sewer connection works and landscaping. All other excavations and all material storage will be set back a minimum of 25 m from the watercourse. This setback allows for interception and management of surface water runoff prior to discharge, thereby reducing the risk of sedimentation entering the river and, downstream, any European sites (SAC/SPA). As shown in the Proposed Drainage Layout (Drwg no. PE492-D327-006-007-001), localised works will be required outside the fenced area to

	facilitate connection to the public foul sewer, which is located approximately 15 m from the river. These works will be of short duration, and appropriate control measures will be implemented around this work zone to ensure no surface water runoff enters the river during construction.
<i>Condition (ix) Prior to commencement of development, the developer shall lodge with the planning authority a cash deposit , a bond of an insurance company or such other security as may be accepted by the planning authority to secure the protection of existing trees and hedgerows to be retained</i> <i>Reason: In the interests of protection of biodiversity in amenity, ecology and sustainable development and to secure the retention of existing trees and hedgerows on the site</i>	ESB notes this condition and has no objection to the principle of its inclusion. ESB also wishes to highlight that, following consultation with the adjoining landowner (Glenveagh Homes), it is understood that their proposed development will include the removal of existing trees and hedgerows along the R139, including those forming the southern boundary of the ESB site, to facilitate enhanced pedestrian and cycle connectivity. Accordingly, any bond or security required under this condition should take account of these planned removal works by third parties, and the valuation or extent of security should be aligned with the trees and hedgerows that will actually be retained as part of the final coordinated design.

Condition 2: ESB notes this proposed condition regarding **transportation** and has no objection.

Condition 3: ESB notes the proposed conditions from DCC regarding **archaeological requirements**. ESB propose that the conditions suggested by the Department of Housing, Local Government and Heritage - Development Applications Unit are attached to a grant of planning instead of the conditions suggested by DCC – See section 2.4 below.

Condition 4: ESB notes the proposed conditions from DCC regarding **air quality and noise control**. ESB has no objection to the majority of these proposed conditions but wishes to comment on the following:

Suggested Condition	ESB Comment
<i>(ii) Site development and works shall be carried out between the hours of 0700 to 1800 Mondays to Fridays inclusive, and between 0800 to 1400 hours on Saturdays only. Permission to work</i>	The construction programme and Noise Impact Assessment submitted with this planning application are based on extended working hours

<i>outside of these hours shall be subject to written agreement of the planning authority</i>	of 0700 to 1900 Monday to Friday and 0800 to 1600 on Saturdays. Given the strategic importance of the proposed electrical infrastructure, it is important that the working hours proposed in the oCEMP (Section 2.3.2) and assessed in the Noise Impact Assessment (Section 5.1) are permitted to facilitate the timely and effective completion of the development. The reduced working hours proposed by DCC would reduce working hours by 10% and would result in c. 3 months added to the overall programme.
<i>(iv) During the operation phase noise emissions from the site shall not exceed the LA90 by 3dB(A) when measured as an LAeq (5min at night, 15 min in day) unless otherwise agreed in writing with the planning authority. There shall be no tonal emissions for the site.</i>	ESB note the permitted sound levels for operational phase noise and accept that “(iv) During the operation phase noise emissions from the site shall not exceed the LA90 by 3dB(A) when measured as an LAeq (5min at night, 15 min in day) unless otherwise agreed in writing with the planning authority.” However, the condition states that “there shall be no tonal emissions for the site.” The proposed transformers emit tonal sound and therefore we request that the wording of this condition is altered to remove this sentence. This has been assessed in the Noise Impact Assessment that accompanies the planning application. The following is an extract from the Noise Impact Assessment Report completed by Alive Environmental: “A worst-case tonal correction of +6dB has been added under the BS4142 assessment methodology on the basis of a worst-case assumption of a prominently audible tonal noise from the substation. Table 6.2 and 6.3 indicate that all predicted noise levels with tonal correction are significantly below existing background sound levels at the nearest noise sensitive receptors for the daytime and night-time periods. This assessment results indicate that there is no likelihood of adverse noise impact during both the day and night-time periods at the nearest noise sensitive properties.” (Pg. 22-23, Noise Impact Assessment)

Condition 5: ESB notes the proposed condition relating to **Drainage** and has no objection.

Condition 6: ESB notes the proposed condition relating to **external finishes and boundary treatments**, and has no objection.

Condition 7: DCC have requested that a **financial contribution** be paid for the proposed development. ESB notes that there is no provision to include development contributions for applications made under S182A of the Act. As such, ESB would request that ACP do not attach this proposed condition should permission be granted.

Other Comments

In addition to the 7 no. proposed conditions from DCC there are some comments in the DCC submission to be addressed.

The Submission from the Parks, Biodiversity and Landscape Services Division noted the following *"It is advised that all site compound areas are only permitted to the south of the subject site and no works activity takes place within 20m of the river. If this is not possible an NIS is advised to be submitted due to the potential of hydrological connectivity."*

The Appropriate Assessment Screening report submitted with the planning application notes that *"There is sufficient space to the north and south of the proposed substation to accommodate a temporary construction compound."* (AA Screening, Section 3.2.1.4, pg. 11)

"The terrestrial buffer between the proposed development and the surrounding watercourses, i.e. The northern site boundary lies 10 m from the watercourse, with the substation internal compound located >50 m from the watercourse. Excavations within 25 m of the watercourse will be limited to connecting to the local public foul water system and landscaping. All other excavations and all storage of materials will be set back a minimum of 25 m from any watercourse. which would allow the interception of surface water runoff prior to discharge into the watercourses, and in turn the downstream watercourses/ European sites, further reducing the risk of a significant sedimentation event impacting to the SAC or SPA." (AA Screening, Section 5.4.1.2, pg. 27)

The site compound will be greater than 50 m setback from the River Mayne with any excavated material stored at least 25 m from the River Mayne. With this and the nature and scale of the proposed development, the AA Screening Report has concluded that there will be no likelihood of significant effects on any European Site, and therefore there is no requirement for an NIS.

2.2. HSE

The submission from Health Service Executive (HSE) sets out the criteria for consideration of likely significant effects on public health and description of the proposed development. HSE has made 7 no. recommendations. ESB responses to the proposed recommendations are outlined below:

- ESB notes the recommendation regarding **early local community engagement**. Given the scale, nature and setting of the proposed substation, a minimum of 100 m from the nearest residential receptor; ESB do not proposed to appoint a specific “*Community Liaison Officer (CLO)*” or undertake specific open community engagement events. However, in accordance with Section 8.2 of the Outline Construction Environmental Management Plan (oCEMP), the Site Manager will be responsible for recording any complaints received from members of the community. Furthermore, notices will be affixed to the site entrance prior to construction commencement. These notices will include the contact details for the designated site manager.
- ESB notes the recommendation regarding the **implementation of the water mitigation measures proposed in the oCEMP submitted with the planning application**. ESB accepts proposed recommendation and requests that this recommendation be included as a condition of consent.
- ESB notes the recommendation regarding the **implementation of the air quality measures proposed in the oCEMP**. The HSE's recommendation to provide a wheel wash facility for HGVs leaving the site will be included in the final CEMP, if required. Details of which can be agreed with the planning authority prior to construction commencement, if conditioned.
- ESB notes the recommendation regarding the **noise and vibration mitigation measures proposed in the oCEMP**. ESB considers that restricting Saturday working hours may adversely affect the project programme as outlined in the ESB response to DCC suggested Condition 4(ii) in Section 2.1 above. ESB requests that, should ACP attach a condition relating to working hours, it reflects the hours assessed as part of the planning application documentation already submitted.
- ESB notes the recommendation regarding the **implementation of the oCEMP mitigation measures and controls**. ESB accepts proposed recommendation and requests that this recommendation be included as a condition of consent.

- ESB notes the recommendation regarding **compliance with food safety legislation** and has no further comment.
- ESB notes the recommendation regarding **compliance with tobacco legislation** and has no further comment.

2.3. Inland Fisheries Ireland

The submission from Inland Fisheries Ireland (IFI) notes that the watercourse north of the proposed development is connected to the River Mayne and emphasises the implementation of mitigation measures to protect water quality. IFI has made 8 no. observations. ESB responses to the proposed observations are outlined below:

- ESB notes the observation that **the proposed development is adjacent to a sensitive section of the River Mayne which contains populations of European Eel and other fish species**. The mitigation measures outlined in Sections 4.2.2 and 4.3 of the Planning and Environmental Report submitted with the planning application will be implemented to ensure the protection of the river, all aquatic species and its surrounding environment including European Eel.
- ESB notes the observation that **ground preparation and construction work have the potential to release sediments and pollutants into adjacent watercourses**. The mitigation measures outlined in Sections 4.2.2 and 4.3 of the Planning and Environmental Report will be implemented to ensure the protection of fauna and flora of this freshwater system including the prevention of the release of sediment and pollutants into adjacent watercourses.
- ESB notes the observation that **all personnel and contractors should be familiar with and adhere to the proposed mitigation measures prior to the commencement of works**. Site induction, training and toolbox talks will be undertaken before works commence to ensure construction personnel and contractors are aware of mitigations measures, sensitive environmental receptors, and site-specific controls. These procedures are detailed in Section 5.2 of the Outline Construction Environmental Management Plan submitted with the planning application and will be implemented to protect water quality and aquatic habitats.
- ESB notes the observation that **excavated material must be appropriately managed**. The mitigation measures outlined in Sections 4.2.2 and 4.3 of the Planning and

Environmental Report will be implemented to minimise pollution risk. All storage of materials will be setback a minimum distance of 25 m from the watercourse.

- ESB notes the observation that **all works must be carried out in accordance with the Construction Environmental Management Plan (CEMP)**. An Outline Construction Environmental Management Plan was submitted with the planning application and will be incorporated into the final CEMP, which will be prepared by the appointed Contractor and agreed with the relevant parties prior to the commencement of works. ESB confirms that all works will be undertaken in accordance with the CEMP to ensure compliance with relevant environmental legislation and statutory consent requirements.
- ESB notes the observation that **contaminated water must not be discharged directly to watercourses, and dewatering discharges must be appropriately managed**. The mitigation measures outlined in Sections 4.2.2 and 4.3 of the Planning and Environmental Report (PER) will be implemented to ensure water quality protection. As outlined in Section 4.2.2 of the PER, if dewatering is required, it will be done in accordance with CIRIA Report C750 Groundwater Control – Design and Practice or equivalent and in accordance with any discharge licence /permit requirements stipulated by the relevant authority. This will ensure that contaminated water will not be discharged directly to watercourses and dewatering will be appropriately managed.
- ESB notes the observation that **measures must be taken to prevent solids entering the surface water system during pipework connections**. The mitigation measures outlined in Sections 4.2.2 and 4.3 of the Planning and Environmental Report will be implemented to prevent solids entering the surface water system and ensure its protection.
- ESB notes the observation that **all discharges must comply with applicable surface water and groundwater regulations** and has no further comment.

2.4. NPWS (DHLGH Development Applications Unit)

The submission from Department of Housing, Local Government and Heritage (DHLGH) through its Development Applications Unit (DAU), advises that any grant of permission should be subject to 4 no. conditions. ESB notes the proposed conditions regarding archaeology and cultural heritage requirements and has no objection.

As set out previously in Section 2.1, ESB accepts the proposed conditions and requests that these conditions be attached to any grant of planning permission.

2.5. Transport Infrastructure Ireland

The submission from Transport infrastructure Ireland (TII) advises that ACP should have regard to Chapter 3 of the *Spatial Planning and National Roads Guidelines* when assessing the application and notes that National Transport Authority is responsible for future Luas, Metro and BusConnects alignments. ESB notes the submission from TII and has no further comment.

2.6. Uisce Éireann

The submission from Uisce Éireann (UÉ) confirms that ESB has engaged with them via a Pre-Connection Enquiry and UÉ confirmed in January 2026 that the water and wastewater connections are feasible. UÉ has suggested 2 no. conditions which ESB notes and has no objection.

3. Conclusion

Given that the statutory bodies have raised no objections to the proposed development, and that Dublin City Council has recommended the grant of planning permission, I trust that An Coimisiún Pleanála has all the necessary information required to progress the application at this stage. If you do have any queries, please do not hesitate to get in touch by email at janette.mcdonald@esb.ie or by mobile - 0860840492.

Yours Sincerely,



Janette McDonald

Planning and Environmental Team Lead

ESB Engineering and Major Projects