
ACP Case reference: VA29N.324276 / ACP-324276-26 - HSE NEHS submission

From environmentnehs <environmentnehs@hse.ie>

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To SIDS <sids@pleanala.ie>

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Good afternoon,

RE: An Coimisiún Pleanála - Case reference: VA29N.324276 / ACP-324276-26 SID Proposed development of a 110kV/38kV MV electrical distribution substation and associated works in Belmayne, Clonsaugh, Dublin 17.

Please find attached HSE NEHS submission for case reference 324276.

Thank you and regards,

Lorraine Dempsey

Environmental Health Officer | Oifigeach Sláinte Chomhshaoil

Environment Network Support Unit | Comhshaol Aonad Tacaíochta Lónra

HSE National Environmental Health Service (NEHS) | FSS Seirbhís Náisiúnta Sláinte Comhshaoil

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National Environmental Health Service Submission Report

(as a Statutory Consultee under the Planning and Development Acts 2000 (as amended) & Regulations made thereunder)

Date: 24th June 2026

Type of consultation: Strategic Infrastructure Development (SID) with a Planning and Environmental Report (PER)

Report to: An Coimisiún Pleanála (ACP)
Email: sids@pleanala.ie

Planning Case Reference No.: VA29N.324276 / ACP-324276-26

Our Reference No. EHIS 5961

Applicant: Electricity Supply Board (ESB)

Description of Proposed Development: Construction of a new 110 kV / 38MV electrical distribution substation on a c. 2.27 ha site on the R139, Belmayne, Clonsaugh, Dublin 17.

Dear Sir/Madam,

Please find below the HSE submission report in relation to the above proposal. The following HSE departments were made aware of the consultation request for the proposed development on the 19th May 2026:

- Emergency Planning
- National Capital Estates Office
- Director of National Health Protection
- Regional Executive Officer Dublin and North East

1. Introduction

The HSE is a statutory consultee under Article 28 of the Planning and Development Act 2000 (as amended) and has a remit to make observations on a planning application accompanied by an EIAR with regard to any likely significant effects on Public Health. The National Environmental Health Service (NEHS) can make observations on any planning application as a statutory consultee.

In this submission the Applicant has provided a non-statutory PER and not an Environmental Impact Assessment Report (EIAR). This proposed development does not fall within any of the classes of development under Part 1 or Part 2 of Schedule 5 of the Planning and Development Regulations 2001 (as amended).



The objective of any observations by the NEHS are to inform ACP on any likely significant effects on Public Health and give an opinion on any proposed mitigation to protect Public and Environmental Health. Any observations made are to inform and assist the decision making of ACP in the planning process.

The NEHS submission report is based on an assessment of documentation submitted with the planning application, particularly the accompanying PER.

All commitments to future actions including mitigation and further testing have been taken as read and all data results have been accepted as accurate.

- No additional investigations/measurements were undertaken by the NEHS.
- This report refers only to those sections of the application documents that are relevant to the NEHS, which have likely significant Environmental Health or Public Health Impact(s).

Criteria for Consideration of Likely Significant Effects on Public Health

The NEHS considers likely significant effects on Public Health as per the EPA issued National Guidance: Guidelines on the information to be contained in Environmental Impact Assessment Reports, 2022

https://www.epa.ie/publications/monitoring--assessment/assessment/EIAR_Guidelines_2022_Web.pdf

Particularly section 3 of the Guidance on Human Health which is reproduced below:

Human Health

The recitals to the 1985 and 2011 Directives refer to 'Human Health' and include 'Human Beings' as the corresponding environmental factor. The 2014 Directive calls this factor 'Population and Human Health'.

While no specific guidance on the meaning of the term Human Health has been issued in the context of Directive 2014/52/EU, the same term was used in the SEA Directive (2001/42/EC). The Commission's SEA Implementation Guidance states 'The notion of human health should be considered in the context of the other issues mentioned in paragraph (f)'. (Paragraph (f)⁴⁷ lists the environmental factors including soils, water, air etc). This is consistent with the approach set out in the 2002 EPA EIS Guidelines where health was considered through assessment of the environmental pathways through which it could be affected, such as air, water or soil, namely:

'The evaluation of effects on these pathways is carried out by reference to accepted standards (usually international) of safety in dose, exposure or risk. These standards are in turn based upon medical and scientific investigation of the direct effects on health of the individual substance, effect or risk. This practice of reliance upon limits, doses and thresholds for environmental pathways, such as air, water or soil, provides robust and reliable health protectors [protection criteria] for analysis relating to the environment.'

In an EIAR, the assessment of impacts on population & human health should refer to the assessments of those factors under which human health effects might occur, as addressed elsewhere in the EIAR e.g. under the environmental factors of air, water, soil etc.. The Advice Notes provide further discussion of how this can be addressed.

Assessment of other health & safety issues are carried out under other EU Directives, as relevant. These may include reports prepared under the Industrial Emissions, Waste Framework, Landfill, Strategic Environmental Assessment, Seveso III, Water Framework Directive, Floods or Nuclear Safety Directives⁴⁸. In keeping with the requirement of the amended Directive, an EIAR should take account of the results of such assessments without duplicating them.



The NEHS therefore considers likely significant effects within a population and Human Health context that uses a source – pathway- receptor model, based on emissions through environmental media and population exposure. The exposure of populations, if any, is then considered against recognised health protection criteria.

Whilst EIAR Guidance recognises the requirement to identify sensitive receptors within the assessment process, ACP should be clear that it is within a Population health approach.

A Population Health approach to the sensitivity of receptors would not consider individual specific sensitivity of a human receptor, but the sensitivity of the established land use or service provision. For example, a school would be considered a sensitive receptor within a Population Health approach, but an individual student who was particularly sensitive to noise attending the school would not be specifically considered in the assessment criteria. The exception would be a health care facility that provided services for people with recognised noise sensitivity would be considered in its entirety as a particular noise sensitive location. This is a crucial point, as there are a number of sensitive receptors near the proposed development, which is elaborated further in section 3 of this report.

The Population Health approach therefore has important differences in how likely significant effects on Population and Human Health are considered in EIA. The assessment should consider established land development and use and service provision and activities within communities and not individual members of communities.

It is recommended that the An Coimisiún Pleanála (ACP) also follows this method when considering Public Health in their decision-making.

This report only comments on Environmental Health impacts of the proposed development as outlined in the PER and the adequacy of the PER from the Environmental Health viewpoint. The NEHS has made observations and submissions on the following specific environmental health areas.

- Public Consultation,
- Water,
- Noise and Vibration,
- Air Quality,
- Food Safety and Environmental Compliance and
- Outline Construction Environmental Management Plan (oCEMP).

The comments below are not exhaustive but serve to capture key points of the proposed development.



2. Description of the Project and Physical Environment

The applicant has submitted an SID on the proposed development of a new 110 kV / 38MV electrical distribution substation on a c. 2.27 ha site on the R139, Belmayne, Clonsaugh, Dublin 17.

The purpose of this development is to add capacity and improve distribution security of supply for the North Dublin area. This will be achieved by Belmayne 110kV/38MW Distribution Substation taking power from the existing Belcamp 220 kV substation, and transforming the voltage down to 38 kV for connection to the distribution network. Thereby relieving existing transformer capacity at the Grange 38 kV substation in North of Dublin City, as it is overloaded.

Proposed Development:

The Proposed Development will consist of a new distribution substation and will include the following:

- 1.** Construction of 1 no. substation compound (c. 5,650 sqm) securely enclosed with 2.6 m high palisade fencing and gates, containing:
 - 1 no. 110 kV Gas Insulated Switchgear (GIS) building (c. 707 sqm; c. 12 m in height).
 - 1 no. 38 kV Gas Insulated Switchgear (GIS) building (c. 232 sqm; c. 7 m in height).
 - 2 no. Bunded 110 kV/38 kV Transformers (c. 5 m in height) with associated electrical equipment.
 - 2 no. Bunded 38 kV/MV Transformers (c. 5 m in height) with associated electrical equipment.
 - 2 no. fire walls (c. 5.5 m in height by c. 5 m length) separating the 110 kV/38 kV Transformers and 38 kV/MV Transformers.
 - 3 no. bunded Arc Suppression Coils (c. 4 m in height) with associated electrical equipment.
 - 2 no. Neutral Earth Resistor (c. 2 m in height) and Neutral Earth Switch (c. 3.9 m in height).
 - Perimeter RC wall with Stone Facing on West, North and South Elevations (2.6 m high).
- 2.** Removal and reinstatement of 2 No. Gate Piers at existing entrance and provision of vehicular gate (c. 5 m wide x c. 2.6 m in height) and all associated works at the existing entrance on the R139.
- 3.** All associated site development works including internal access roads, lighting poles (c. 5.75 m in height), 3 no. lightning monopoles (c. 15 m in height), 1 no. emergency stand-by diesel generator, telecommunications,



landscaping, site services including drainage, trenching and ducting and all other ancillary works.

The site is a greenfield site located northeast of Darndale Park and regional road (R139), west of Bewley's Tea and Coffee Head Office Golf Club, south of Washington Memorial Tower, and southeast of Belcamp 220 kV substation and Craobh Chiarans Pitch, Clonshagh.

The construction of the whole development is estimated to take approximately 130 weeks (~2.5 years) to complete as outlined in Table 3-2 of PER. This is not including the ancillary civil works of 24 weeks, as some items may overlap with electrical installation and commissioning works.

3. Comments from the Local Environmental Health Service

Sensitive Receptors

The proposed site is located within the Belmayne/Clongriffin Strategic Development and Regeneration Area, an established and expanding residential area. Residential developments are located in the wider area of the site. The area also contains many schools, childcare facilities, community facilities and recreational facilities, non residential buildings also. Permission has also been granted for additional educational facilities within the wider Belmayne area.

Based on current mapping and business records, the following are the principal sensitive receptors which are residential are within roughly 500m-1km of the proposed substation site.

1. Residential

Within 500m of site-

- Burnell square - Likely one of the closest occupied developments southwest of the site.
- Burnell Court - Within a few hundred meters of site.
- Burnell Place - Apartments and assistant Housing - relevant noise and traffic impacts here.

Within 300-1,000m of site

- Myrtle Hall - Residential apartment Development
- Belcamp Manor - residential estate
- New Priory - Housing development
- Belmayne wider area - eastern edge of development may fall into 1km zone away from site. Significant residential population and further development means growing.



2. Residential - Halting sites

- Tara lawns - A long established permanent halting site located on Belcamp lane just off the R139 near northern Cross/Clarehall area.
- Cara Park - Located slightly further, down Belcamp Lane and this site has both halting pitches as well as associated group housing.

3. Non-residential

- Northern Cross business Park
- Hilton Airport Hotel - Northern Cross close proximity to site.

4. Schools / Educational Facilities / Creches

- Belmayne Educate Together National School – primary school located in Belmayne.
- St Francis of Assisi Primary School, Belmayne – primary school on Belmayne Avenue.
- Belmayne ETSS – secondary school serving the Belmayne area.
- Belmayne Community Special School – special school at Balgriffin Park.
- Giraffe Childcare Limited Northern Cross.

5. Healthcare Facilities

- Northern Cross Medical Centre – GP/primary care facility at Northern Cross on the Malahide Road.
- The Medical Centre – Darndale/Belcamp Village Centre.
- Brookhaven satellite Clinic – Healthcare facility in Priorswood.

6. Nursing Homes / Residential Care Facilities

- Care Choice Malahide Road – nursing home located at Northern Cross, relatively close to the proposed development.
- St Michaels House and Alzheimer Unit as well as Cara facility - Location across the road from site on Belcamp Lane which serves vulnerable groups such as elderly, disabled, end of life and chronically ill people. The facilities include:
 - Leisure Centre and Swimming pool used by public for baby swim lessons
 - Day service for disabilities
 - Residential supports for independent living.
 - Cara provides – complex needs and end of life or chronic illness support.
- St Doolaghs Rehabilitation Centre – rehabilitation and residential care facility on Malahide Road.
- Woodlawn Manor Nursing Home – nursing home on Malahide Road.

7. Food Premises

- Bewleys Production Facility is in very close proximity to site.
- Clarehall Shopping Centre - Tesco, Kays kitchen, Eddie rockets, O Briens.



- Fresh, Camille, Flame, Thindi, Velvet Cafe - Bakery – at Northern Cross.

8. Sports / Recreational

- Father Collins Park – major public park with sports pitches and recreational facilities.
- Sports facilities associated with the Belmayne schools and local GAA clubs are also located within the wider area.

The above sensitive receptors should be considered in relation to construction noise, vibration, dust, traffic impacts, operational transformer noise, artificial lighting and emergency generation operation.

Impacts should be appropriately managed throughout the implementation of the mitigation measures outlined in the application documentation. Operational noise from transformers, switchgear and the emergency generator should comply with applicable standards at the nearest noise-sensitive receptors.

Other Industries in the Locality

The surrounding area is predominantly residential and mixed-use in character, with ongoing strategic residential development. There are commercial, retail and service uses within the wider Clongriffin/Belmayne area. No industrial activities of environmental health significance are known to the local office in the immediate vicinity of the proposed site.

Access Roads

The proposed development is accessed from the R139, a major regional route serving the North Fringe area. The road network is generally of a suitable standard to accommodate the proposed development. Construction traffic management measures should be implemented to minimise disruption to local residents, pedestrians and cyclists.

Planning Permissions in the Vicinity

The Belmayne/Clongriffin area continues to be subject to significant residential, educational and infrastructure development in accordance with Dublin City Development Plan objectives and the Strategic Development and Regeneration Area framework. Numerous permissions have been granted in recent years for residential and associated community infrastructure within the wider area.

Local Concerns

No specific environmental health concerns have been raised with the local office regarding the proposed substation development. Potential concerns



typically associated with such developments relate to construction noise, dust, traffic, visual impact and operational noise. These matters should be addressed through the mitigation measures proposed by the applicant and any conditions attached by ACP.

One issue to highlight is that there are many vulnerable people in this area e.g. St Michael's House. Therefore, the applicant should be mindful about the operational noise as may cause disruption in relation to sensory issues etc. Traffic management with vulnerable groups e.g. Buses arriving with people who are elderly or young who may have intellectual or chronic illnesses ensuring minimum disruption to schedules in relation to these people.

Private Wells and Watercourses

No information is available to the local environmental health office regarding the presence of private groundwater wells serving domestic properties in the immediate vicinity.

The site is bounded to the north by the Clonshagh Stream, a tributary of the River Mayne. Surface water protection measures, pollution prevention controls, drainage infrastructure and emergency spill response procedures should be implemented during both construction and operation to prevent impacts on receiving waters.

Flooding and Adverse Weather

The site is located adjacent to the Clonshagh and the northern boundary is adjacent to the Mayne River, with a buffer zone between the proposed site boundary and the river. The applicant's drainage and flood risk assessments should demonstrate that the development will not increase flood risk on-site or elsewhere and that surface water will be managed in accordance with SuDS principles. Appropriate measures should be implemented to ensure resilience to extreme rainfall events and climate change.

Environmental Health Conclusion

Particular attention should be given to construction phase noise, dust control, protection of surface waters, operational noise from transformers and generators, and management of construction traffic.

4. Public Consultation

Public Consultation could not be found in PER. NEHS noted that there was only site notices placed in the Irish Examiner and Irish Daily Star newspapers on the 1st May 2026.



NEHS recommends that there is engagement with the local community as early as possible and in particular during the construction phase. This may include a focal point person such as a Community Liaison Officer (CLO) where feedback including complaints can be received, including a process for the complaint to be investigated and responded to in a timely manner.

5. Water

NEHS has considered section 4.2.2 of PER, Appendix B, C and Drawings PE492-D327-006-007-001 and PE492-D327-006-008, which sets out to assess the potential impacts of the development on the water environment (Surface and groundwater).

Appendix C – Site-Specific Flood Risk Assessment concluded that this site is within Flood Zone C, which is defined in Table 2-1 that the probability of flooding from rivers and sea is low. However, sub-stations are categorised as highly vulnerable development as its essential infrastructure, as per Table 2-2. The closest historical single flood event occurred at Balgriffin Park, approximately 1Km from the site in June 1993. A Justification Test is required where development is proposed in areas of moderate or high flood risk. The outcome was determined by Table 4-1 and concluded that it was considered appropriate, that this development would not be subject to a Justification Test.

While no direct human health impacts are anticipated, there is potential for indirect effects during construction through sediment runoff, spills, or disturbance of drainage pathways.

The NEHS recommends strict adherence to the oCEMP mitigation measures in section 4.2.2 and Table 6-1, with particular emphasis on:

- **Surface water protection,**
- **Spill prevention and,**
- **Management of excavated material e.g. any excavated vegetation, soil and subsoil will be temporarily stockpiled away at least 20 m from any watercourse / site drain in order to reduce the potential for entry of suspended solids.**

6. Noise and Vibration

NEHS has considered Section 4.2.3 of PER and section 5.3, 7.1 and 7.2 of Appendix D which sets out to assess the potential impacts of the development on the Noise and vibrations. The assessment is of most relevance to the construction phase only.

The noise survey location was selected to be approximately from the dominant noise source (road traffic noise from R139) and the nearest noise sensitive receptors (located c. 100 m south west of the site), which is illustrated in Figure



6.1 and 6.2 of Appendix D. NEHS notes in section 4.2.3 of PER that during the construction phase all measures and monitoring to ensure that construction noise levels are maintained below the Category B BS5228 noise threshold limits are included in the final CEMP.

In order to comply with best practice guidance to minimise any significant noise and vibration impacts a number of mitigation measures are proposed in the table 6-1 of oCEMP. These include selection of quieter plant and machinery, noise control at source and site hoarding in Figure 1.3. etc.

One issue to highlight as a mitigation measure is the anticipated construction hours which are listed 07:00 and 19:00 on Monday to Fridays, between 08:00 and 16:00 on Saturdays and there will be no activity on Sundays or Bank Holidays. The Saturday hours could be shortened to 14:00hrs as a finish time.

NEHS recommends that the mitigations measures proposed in section 4.2.3 of PER and Table 6-1 of oCEMP are adopted as minimum conditions of planning if permission is granted. The operational hours proposed should be reconsidered to finish at 14:00hrs on a Saturday with no construction work taking place on Sundays and Public Holidays.

7. Air Quality

The primary source of air quality impacts relevant to the proposed development relate to dust emissions during the construction phase.

NEHS recommend that the mitigations measures described in section 4.4 of oCEMP, in relation to construction phase are set as minimum conditions of planning if permission is granted. This should include dust monitoring to be carried out at the site boundaries of construction work to verify the effectiveness of the mitigation measures proposed. Additional measures not listed should include a wheel wash for HGVs existing the site.

8. Food Safety and Environmental Compliance

The development itself will bring level of employment in the construction phase. Should welfare facilities in the temporary construction compound become a commercial canteen or food preparation area, then it operates as a food business. The NEHS require that registration be undertaken in accordance with Article 6(2) of Regulation (EC) No. 853/2004, and that early engagement with the appropriate registering authority be undertaken to ensure compliance with food hygiene legislation.

Where smoking shelter(s) are provided if any within temporary construction compound, they shall comply with Section 47 of the Public Health (Tobacco) Act 2004 (as amended). NEHS recommends that early engagement with the



appropriate registering authority is undertaken to ensure compliance with Tobacco legislation.

9. Outline Construction Environmental Management Plan (oCEMP)

The NEHS has considered the oCEMP and is of the opinion that there will be adequate protection of Public and Environmental Health during the construction phase provided the following are implemented:

- The mitigation and controls are implemented in full.
- The effectiveness of environmental controls are monitored and reviewed and increased mitigation/corrective action is taken where required, especially when there is an environmental complaint.
- All drinking water and water used for the preparation of food in the temporary construction compound should meet the requirements of S.I. No. 99/2023 - European Union (Drinking Water) Regulations 2023 (as amended).
- There should be no direct emission to ground or surface water of any foul waste water.
- Site drainage should ensure the protection of surface and ground water during the construction phase.
- The dust monitoring is a monthly average standard. Compliance with standard can incorporate short periods of very high levels of dust deposition followed by low levels and still be compliant. It is therefore important that dust minimisation is continually implemented and any complaints are investigated and responded to.
- A pest/vector management control plan should be developed for protection of nearby sensitive receptors. Construction activities should ensure that drains and sewers are not damaged or left open, in order to prevent rodent access and infestation. This is a crucial point, as there are a number of sensitive receptors near the proposed development, which is elaborated further in section 3 of this report.

10. Recommendations

Should permission be granted for the proposed development, the NEHS makes the following recommendations:

- That there is engagement with the local community as early as possible and in particular during the construction phase. This may include a focal point person such as a Community Liaison Officer (CLO) where feedback including complaints can be received, including a process for the complaint to be investigated and responded to in a timely manner.



- In Water the mitigation measures described in oCEMP in section 4.2 and Table 6-1 should be adopted for all stages i.e. construction and operation phases, and be included as a condition of consent.
- In Air Quality the mitigations measures described in section 4.4 of oCEMP, in relation to construction phase are set as minimum conditions of planning if permission is granted. Dust monitoring to be carried out at the site boundaries of construction work to verify the effectiveness of the mitigation measures proposed. Additional measures not listed should include a wheel wash for HGVs existing the site.
- In the area of Noise and Vibration mitigations measures proposed in section 4.2.3 of PER and Table 6-1 of oCEMP are adopted as minimum conditions of planning if permission is granted. The operational hours proposed should be reconsidered to finish at 14:00hrs on a Saturday with no construction work taking place on Sundays and Public Holidays.
- oCEMP mitigation and controls are implemented in full, and be included as a condition of consent, especially a pest/vector management control plan.
- Compliance with food safety legislation where applicable (Regulation (EC) No. 852/2004) and that early engagement with the appropriate registering authority be undertaken for any temporary construction compound canteen on site to ensure compliance with food hygiene legislation.
- Compliance with tobacco legislation with Section 47 of the Public Health (Tobacco) Act 2004 where applicable for any temporary smoking facilities on site.

If you have any queries regarding this submission, the initial contact is Siobhán Grace Principal Environmental Health Officer who will refer your query to the appropriate person.

Yours Sincerely,

Principal Environmental Health Officer
Dublin North East City,
Adelaide Chambers,
Peter Street,
Dublin 2.

Environmental Health Officer,
Environment Network Support Unit