

The Secretary,
An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1

Date: 16th July 2026
Ref.: BrC 24062

Re: Section 182E Pre-Application Consultation Request in respect of a proposal for the provision of a customer 110kV substation (110kV to 10kV) at Diageo Brewery, Dublin 8

Section 182A to 182E – Strategic Infrastructure Development

Dear Sir / Madam,

On behalf of our client, Diageo Ireland, we wish to enter into pre-application consultation under Section 182E of the Planning and Development Act 2000 (as amended), in respect of a proposal for the provision of a new Diageo (customer) 110kV substation (110kV to 10kV) to be located on lands at the Guinness Brewery, bounded by James's Street, Watling Street, Victoria Quay and Steeven's Lane, Dublin 8.

This pre-application submission follows the requirements of section 3.2 of Strategic Infrastructure Development Electricity Transmission Guidelines, published by An Coimisiún Pleanála. Details required are included throughout this letter and attached documents and our response to the requirements set out in section 3.2 are summarised in **Appendix 1**.

Please find enclosed:

- P-1000 Site Location Plan
- Diagram of proposed works
- Payment has been made by RKD of €4,500 (Reference: "Diageo SID Pre Application James")

Diageo Ireland previously engaged in pre-application consultation with ACP in relation to a broader scope of works (ABP-319699-24). This is set out in the Planning History section of this letter.

The scope of works subject to this pre-application request has now been reduced to one element of that previously discussed; the other elements discussed previously will be undertaken and subject to a separate application by the ESB.

Diageo Ireland wishes to engage with ACP with regard to the revised proposal in advance of the submission of a SID application for the proposed development.

The purpose of this revised pre-application process is to ensure that the proposals discussed at pre-application stage correspond to that which will be submitted at application stage. As the proposals to which this letter relates comprise works which were already

considered at pre-application stage by the Commission (albeit as part of a larger scope of works), we would hope for an expedited pre-application process.

Site and Surrounding Area

The wider subject site comprises the Guinness Brewery, located approximately 2km from Dublin city centre. The brewery site is bound to the north by Victoria Quay, beyond which is the Liffey; to the west by Steeven's Lane, beyond which is Dr Steeven's Hospital and St Patrick's University Hospital and to the east by Watling Street, beyond which is a range of development including commercial, residential and other uses. The southern boundary of the brewery comprises James's Street but many of the buildings along James's Street are not owned by Diageo and are in use for uses other than associated with the brewery. The brewery has a long history on the site; Diageo are committed to continuing brewing on site in the long term.

The proposals to which this consultation relates are located to the southwest corner of the brewery site.

Project Scope

In response to existing and planned electricity demand arising from development within the area, the ESB have identified a requirement in the area for a 110kV substation on Steeven's Lane. This is proposed adjacent to Steeven's Lane and is shown in pink below and marked "110kV Substation". In addition to the substation, ESB propose various distribution lines as shown below.

We understand that ESB have engaged in pre-application consultation with ACP (ACP Ref.: 322700-25) and are in the process of preparing an application for submission to ACP for the works which fall within their scope.

In order to link this proposed new ESB infrastructure to the brewery, Diageo require the following:

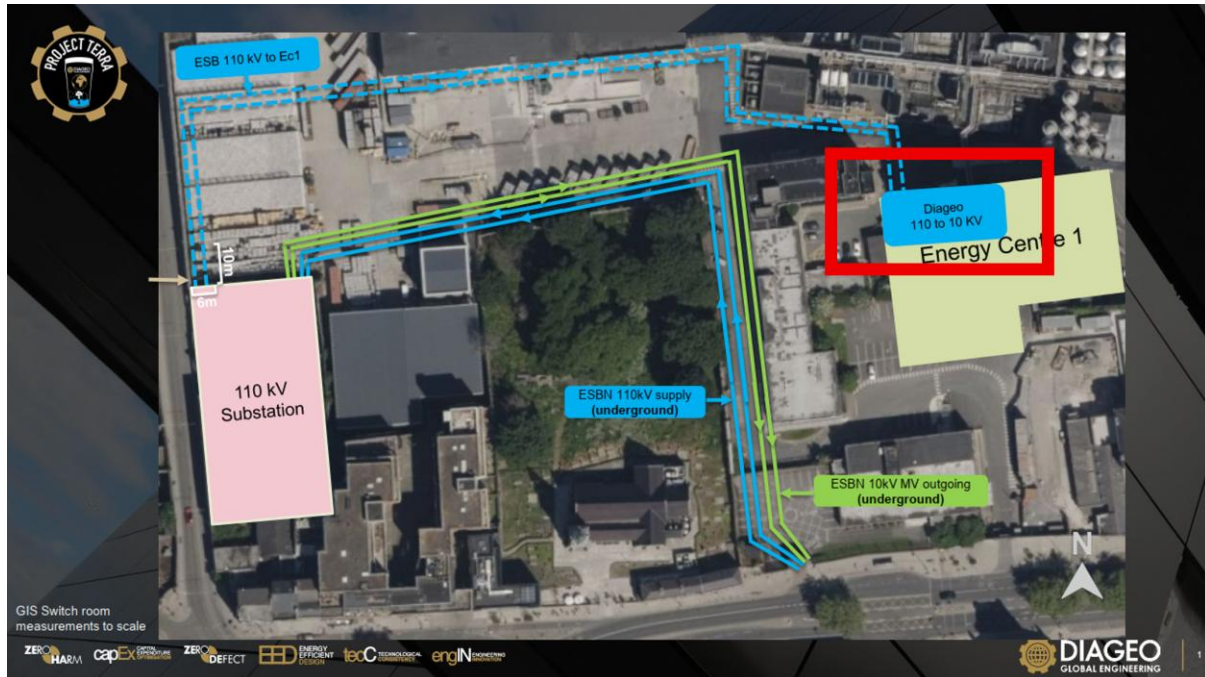
- A Diageo onsite 110kV – 10kV substation transformer unit

It is this 110kV – 10kV substation transformer unit which is the subject of this pre-application request.

The substation transformer unit will be developed by Diageo and constructed to facilitate the overall move of the brewery from gas power to electricity.

Energy Centre 1, shown in Figure 1 below, has been permitted by DCC under Reg. Ref.: WEB2472/24 and will be delivered by Diageo. The other elements will be provided by ESB.

Figure 1: Proposed Works (Edged in red)



Planning History

Diageo Ireland Pre-Application (ABP-319699-24)

In May 2024 Diageo Ireland sought pre-application consultation with An Coimisiún Pleanála with regard to a broader scope of works. These comprised:

- A new 110kV ESB Meter & Isolation Room to accept the incoming 110kV power supply
- A new 110kV underground supply from the ESB Meter Room to a new 110kV - 10kV substation
- A Diageo onsite 110kV – 10kV substation transformer unit

The previous proposals comprised three elements. The current proposals solely the Diageo onsite 110kV – 10kV substation transformer unit.

A meeting was held on 20th June 2024 and on 9th October 2024 ACP determined that *“the proposals fall under the scope of section 182A of the Planning and Development Act 2000, as amended, and that a planning application should be made directly to the Board”*.

The Inspector’s Report, in consideration of the proposals, concluded that all three elements were strategic infrastructure development. The Inspector’s Report states:

“I am therefore satisfied that the proposed 110kV underground cable network and 110kV substation at the Guinness Brewery, which is proposed to connect to a separately proposed ESB substation outside of the site, constitutes strategic infrastructure development”.

ESB Pre-Application Consultation (ABP-322700-25)

The ESB sought pre-application consultation with ACP on 4th June 2025 with regard to: *“the installation of a new 110/38/kV/MV substation at a site currently located within the Diageo complex and fronting onto Steeven’s Lane, Dublin 8”*.

On 3rd February 2026, ACP concluded that the proposal falls within the scope of section 182A of the Planning and Development Act 2000, as amended, and that a planning application should be made directly to the Commission.

Relevant Provisions of the Planning and Development Act 2000, as amended

Section 182A of the Planning and Development Act 2000 (as amended) states:

“Subject to subsection (1B) and section 182AA, where a person (hereafter referred to in this section as the “undertaker”) intends to carry out development comprising or for the purposes of electricity transmission, (hereafter referred to in this section and section 182B as “proposed development”), the undertaker shall prepare, or cause to be prepared, an application for approval of the development under section 182B and shall apply to the Board for such approval accordingly”.

Section 182A(9) provides details of the definition of ‘transmission’:

“In this section “transmission”, in relation to electricity, shall be construed in accordance with section 2(1) of the Electricity Regulation Act 1999 but, for the purposes of this section, the foregoing expression, in relation to electricity, shall also be construed as meaning the transport of electricity by means of—

- (a) a high voltage line where the voltage would be 110 kilovolts or more, or*
- (b) an interconnector, whether ownership of the interconnector will be vested in the undertaker or not”.*

Section 2(1) of the Electricity Regulation Act 1999 defines ‘transmission’, ‘distribution’, ‘electric plant’ and ‘interconnector’ as follows:

““transmission”, subject to section 2A, in relation to electricity, means the transport of electricity by means of a transmission system, in the State or offshore, or both, that is to say, a system which consists, wholly or mainly, of high voltage lines and electric plant and which is used for conveying electricity from a generating station to a substation, from one generating station to another, from one substation to another or to or from any interconnector or to final customers but shall not include any such lines which the Board may, from time to time, with the approval of the Commission, specify as being part of the distribution system but shall include any interconnector owned by the Board.”

““distribution”, in relation to electricity, means the transport of electricity by means of a distribution system, that is to say, a system which consists of electric lines, electric plant, transformers and switchgear and which is used for conveying electricity to final customers;”

““electric plant” means any plant, apparatus or appliance used for, or for purposes connected with, the generation, transmission, distribution or supply of electricity, other than—

- (a) an electric line,*
- (b) a meter used for ascertaining the quantity of electricity supplied to any premises, or*
- (c) an electrical appliance under the control of a consumer;”*

““interconnector” means equipment used to link electricity systems;”

Consideration

Diageo Ireland previously engaged in pre-planning consultation with ACP with regard to proposals for electricity infrastructure comprising:

- A new 110kV ESB Meter & Isolation Room to accept the incoming 110kV power supply
- A new 110kV underground supply from the ESB Meter Room to a new 110kV - 10kV substation
- A Diageo onsite 110kV – 10kV substation transformer unit

Following ongoing engagement between Diageo and ESB, and revisions to the scheme, the scope of works to be provided by Diageo is now reduced and comprises only:

- A Diageo onsite 110kV – 10kV substation transformer unit

Mindful of the requirement to engage with ACP in advance of the submission of a SID application, and to ensure that the future application matches that which was the subject of a pre-application process, Diageo request the Commission's confirmation that the proposed development is SID.

The previous Inspector's report considered that all elements previously discussed were SID. It is therefore considered that a determination that the proposed development is SID would be consistent with the earlier determination.

Conclusion

While the Commission has previously determined that the broader proposal constituted SID, the current application relates only to one component of those works. Diageo therefore considers it appropriate, in the interests of procedural certainty and to ensure full alignment between the proposal discussed at pre-application stage and the proposal ultimately submitted, to seek a revised determination.

For the reasons set out above, it is considered that the works set out in this letter are Strategic Infrastructure Development, in line with the previous determination of the Commission, and should form part of an application to be made directly to An Coimisiún Pleanála.

We would welcome an early determination to ensure that the proposed SID application can be progressed as soon as possible.

Yours sincerely,



JSA Planning

Appendix 1:

Requirement from Section 3.2.2 of the Guidelines	Information Provided
The name and address of the prospective applicant, contact telephone numbers and email address, if available.	Diageo Ireland, St James's Gate, Dublin 8 Contact: Shannon Green (0872273695 / shannon.green@diageo.com)
The name and address of the prospective applicant's main agent, if any, contact telephone numbers and email address, if available	Brian Coughlan, John Spain Associates, 39 Fitzwilliam Place, Dublin 2 (0876407881 / bcoughlan@jsaplanning.ie)
General description of the nature and scale of the proposed development, including drawings should these be available and analysis of its role, purpose and function in regard to electricity transmission in the State (and elsewhere)	Please refer to letter.
Address of the proposed development and a brief description of the site and surrounding area,	Lands to the south west corner of Diageo Brewery, lands bounded by Watling Street, James's Street, Victoria Quay and Steevens Lane, St James's Gate, Dublin 8.
A site location map(s) and a site map(s) showing the boundaries of the site	Enclosed.
Where necessary, a statement of the prospective applicant's legal interest to enable it to carry out the proposed development if approved,	Diageo Ireland are owners of the site.
Name of the planning authority or authorities, if more than one, in whose functional area(s) the site is situated,	Dublin City Council
Statement as to why or why not the prospective applicant considers the proposed development should be regarded as strategic infrastructure development including reference to any international, national, regional or local policy context for the proposed development.	Please refer to letter.