To the Lord Mayor and
Members of Dublin City Council

Report No. 157/2024
Report of the Assistant Chief Executive

Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council

Dublin City Council Observations on the Development of North Irish Sea Array Windfarm

SID/04/24 ABP-319866-24

INTRODUCTION
An application has been lodged with An Bord Pleanála for a proposed development known as the North Irish Sea Array. Dublin City Council hereby sets out the submission of the Planning Authority on the proposed development. An Bord Pleanála, as the consenting authority, will decide to grant or refuse this application.

This Report is presented to the members of the Dublin City Council on 2nd September 2024, prior to submission to An Bord Pleanala. The Chief Executive's Report is due to An Bord Pleanala on 17th September 2024.

This report is submitted to the elected members for consideration in accordance with Section 291(6) and (7) of the Planning and Development Act 2000 to request their views on the proposed development. The members of a coastal planning authority may, by resolution, decide to attach recommendations specified in the resolution to the report of the coastal planning authority. This report inclusive of the views and recommendations expressed by the members shall then be submitted to An Bord Pleanála for consideration.

PROCEDURE:
The application has been lodged with An Bord Pleanála under Section 291 of the Planning and Development Act 2000, as amended. It is noted that the applicant has undertaken consultations with the Board in accordance with Section 287(1) of the Act. North Irish Sea Array Windfarm Ltd was granted a Maritime Area Consent in relation to the windfarm which has a commencement date of 23rd December 2022. The Maritime Area Consent states that an application for permission must be submitted 18 months from the commencement date. The application was lodged with An Bord Pleanála on 7thJune 2024.

The correspondence from An Bord Pleanala refers to Section 291(4)(b) of the Act which states that:
A coastal planning authority –
(b) whose nearshore area, or any other part of whose functional area, adjoins that part of the maritime area in which it is proposed that the development concerned would (in whole or in part) be situated, may, not later than 10 weeks (or such longer period as may be specified by the Board) from the making of the application under this section in respect of the proposed development, prepare and submit to the Board a report setting out the views of the coastal planning authority in relation to the proposed development, having regard in particular to the matters to which a coastal planning authority is required to have regard in accordance with subsection (2) of section 34 and subsection (2) of section 282 in relation to an application referred to in subsection (3) of section 281.

Submissions may be made to An Bord Pleanála by 17th September 2024

The correspondence from An Bord Pleanala also refers to Section 291(5) of the Act which states as follows:
The Board may, in addition to a report referred to in subsection (4), require a coastal planning authority to which that subsection applies or any planning authority on whose functional area the proposed development is, in the opinion of the Board, likely to have a significant effect to furnish to the Board such information as the Board may specify in relation to—
(a) the implications of the proposed development for maritime spatial planning,
(b) the implications of the proposed development for proper planning and sustainable development in the functional area concerned, and
(c) the likely effects of the proposed development on the environment or any European site.

Dublin City Council has not received any notification arising from Section 291(5) to date.

Section 291(6) and (7) state as follows:
(6) The chief executive of a coastal planning authority shall, before that coastal planning authority submits a report to the Board under subsection (4) in relation to a proposed development, submit the report to the members of the coastal planning authority and request their views on the proposed development.
(7) The members of a coastal planning authority may, by resolution, decide to attach recommendations specified in the resolution to the report of the coastal planning authority under subsection (4) and, where those members so decide—
(a) those recommendations, and
(b) a record prepared by the meetings administrator (within the meaning of section 46 of the Local Government Act 2001) of the views expressed by the members on the proposed development,
shall be attached to the report submitted to the Board under that subsection.
The submission shall be presented to the members of Dublin City Council Council at the September meeting of the Council.

PROPOSED DEVELOPMENT
The proposal consists of an offshore wind farm comprising of both offshore and onshore infrastructure. The proposed development boundary, within which the proposed development is located, will include offshore infrastructure off the coast of Counties Dublin, Meath and Louth and onshore infrastructure within County Dublin (Fingal and Dublin City Council administrative areas).
A high-level overview of the proposed development is provided below in accordance with the details submitted with the application.
Offshore Infrastructure (located within and Array area and export cable corridor (ECC)):

- Offshore wind turbine generators (WTGs) and their associated foundations;
- Inter-array cables which will connect the WTGs to the Offshore Substation Platform (OSP);
- An OSP and associated foundations; and
- Offshore export cable(s) which will deliver the generated power from the OSP to the high-water mark (HWM) as defined by Ordnance Survey Ireland mapping (the HWM being the transition point between the offshore and onshore infrastructure).

Onshore Infrastructure:

- Offshore export cable(s) from the HWM to the landfall transition joint bays (TJBs);
- Transition joint bays (TJBs) where the offshore and onshore export cables are joined;
- Onshore export cable(s) from the TJBs to the grid facility;
- A Grid Facility, comprising a compensation substation and Bremore substation, together within ancillary infrastructure;
- Onshore cable(s) from the grid facility to the Belcamp Substation; and

- A connection from the onshore cable(s) to the national electricity transmission network at Belcamp Substation.

The landfall will comprise both offshore and onshore infrastructure, with the HWM being the point of transition between the two. The export cables come ashore and transition to onshore cables at the TJBs close to the shoreline at Bremore Bay beach in Bremore, north of Balbriggan, Co. Dublin.

Site Location:
The application documentation describes the offshore infrastructure as being located within the proposed development boundary seaward of the high-water mark (HWM) at the shoreline of Bremore Bay beach in Bremore, north of Balbriggan, Co. Dublin, from the landfall to the furthest extent of the array, covering an area of approximately 125km2. The array area covers approximately 89km2. At its closest point, the array area is located approximately 11.3km from land in water depths of approximately 30m to 63m below lowest astronomical tide (LAT), with the closest Offshore Wind Turbine Generator (WTG) situated approximately 12.3km from the coastline.

The landfall site is where the two offshore export cables reach the shore and extends landward from the HWM and as far as the grid facility. The site identified for landfall will be located immediately south of Bremore Point in the townland of Bremore, north of Balbriggan, Co. Dublin.

The landfall site is within coastal farmland between Bremore Head and the settlement of Balbriggan that descends gently to the east from the R132 coast road. The grid facility is contained within hinterland farmland on the opposite (western) side of the R132 road and immediately north of the Balbriggan.

The onshore cable route tracks the road network south from the grid facility, through Balbriggan before following the R132 road as it runs parallel to the M1 motorway through farmland and rural / industrial sites such as the M1 Business Park. It diverts through farmland at Blakes Cross before rejoining the R132 road and crossing the M1 Motorway at Lissenhall. It then crosses back under the M1 Motorway to follow Estuary road along the southern side of the Malahide Estuary before passing through the urban environs of east Malahide. It follows the R107 regional road south out of Malahide through rural residential areas that include the settlement of Kinsealy before veering west along the R139 road, which marks the northern outskirts of Dublin City, in the direction of the grid connection point at Belcamp substation. There is also an alternative route option towards the southern end of the onshore cable route that diverts east along Chapel Road at Kinsealy and then follows Hole in the Wall Road south to pick up the R139 road at Donaghmede. From there it will return west to Northern Cross to rejoin the common cable route section along the R139 road to Belcamp Substation.

RELEVANT POLICY

National Policy:
National Planning Framework – Project Ireland 2040
Project Ireland 2040 National Planning Framework (NPF), published in July 2018, is the primary articulation of spatial, planning and land use policy in Ireland. The framework is based on directing development to existing settlements rather than allowing the continual expansion and sprawl of cities and towns.
The NPF confirms that the role of Tier 1 ports (which include Dublin Port) will be considered in
In respect of energy transmission, Section 1.3 of the NPF states the following under National Strategic Outcomes – Transition to a low carbon and climate resilient society:

"The National Climate Policy Position establishes the national objective of achieving transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050. This objective will shape investment choices over the coming decades in line with the National Mitigation Plan and the National Adaptation Framework. New energy systems and transmission grids will be necessary for a more distributed, renewables-focused energy generation system, harnessing both the considerable on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy to the major sources of demand".

Section 7.5 Offshore Renewable Energy states the following:
"The development of offshore renewable energy is critically dependent on the development of enabling infrastructure, including grid facilities to bring the energy ashore and connect to major sources of energy demand".

Relevant Policies include the following:
National Policy Objective 42 - To support, within the context of the Offshore Renewable Energy Development Plan (OREDP) and its successors, the progressive development of Ireland's offshore renewable energy potential, including domestic and international grid connectivity enhancements.

Regional Policy:
Eastern and Midlands Regional Assembly (EMRA) Regional Spatial and Economic Strategy 2019-2031
The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region including the Metropolitan Area Spatial Plan (MASP) for Dublin was published in June 2019. The RSES is a strategic plan and investment framework to shape the future development of the region to 2031 and beyond**.**
In respect of the national grid, Section 10.3 Energy states the following:

"Support for the development of a safe, secure and reliable supply of electricity and the development of enhanced electricity networks as well as new transmission infrastructure projects that might be brought forward in the lifetime of this plan under EirGrid's (2017) Grid Development Strategy will serve the existing and future needs of the Region and strengthen all-island energy infrastructure and interconnection capacity".
Relevant regional Policy Objectives guiding the development of ports and energy infrastructure within the RSES include:

RPO 10.20 - Support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the Region and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this Strategy. This includes the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity and gas transmission grid in a sustainable and timely manner subject to appropriate environmental assessment and the planning process.
RPO 10.22 - Support the reinforcement and strengthening of the electricity transmission and distribution network to facilitate planned growth and transmission/ distribution of a renewable energy focused generation across the major demand centres to support an island population of 8 million people, including:

- *Facilitating interconnection to Europe, particularly the 'Celtic Interconnector' to France and further interconnection to Europe/the UK in the longer term*
- *Facilitating interconnection to Northern Ireland, particularly the 'North-South Interconnector and further co-operation with relevant departments in Northern Ireland to enhance interconnection across the island in the longer term*

- *Facilitating transboundary networks into and through the Region and between all adjacent Regions to ensure the RSES can be delivered in a sustainable and timely manner and that capacity is available at local, regional and national scale to meet future needs*
- *Facilitate the delivery of the necessary integration of transmission network requirements to allow linkages of renewable energy proposals to the electricity transmission grid in a sustainable and timely manner*
- *support the safeguarding of strategic energy corridors from encroachment by other developments that could compromise the delivery of energy networks***.**

RPO 10.23 - Support EirGrid's Implementation Plan 2017 –2022 and Transmission Development Plan (TDP) 2016 and any subsequent plans prepared during the lifetime of the RSES that facilitate the timely delivery of major investment projects subject to appropriate environmental assessment and the outcome of the planning process, in particular:

- *Support reinforcement of the Greater Dublin Area between Dunstown and Woodland 400 kV substations to increase the capacity of the often congested and highly loaded Dublin transmission network to enable the transmission system to safely accommodate more diverse power flows and also facilitate future load growth in the area*
- *Support the installation of additional transformer capacity and increased circuit capacity to meet Dublin demand growth to strengthen the network for all electricity users and improve the security and quality of supply*
- *Support the Laois-Kilkenny Reinforcement Project to strengthen the network in large parts of the Midlands and provide additional capacity for potential demand growth in the wider region and strengthen the Region's transmission network by improving security and quality of supply and ensuring there is the potential for demand growth.*

City-Level Policy:

The following Policies and Objectives of the City Development Plan are of particular relevance to this application:

Policy CA11 - Energy from renewable resources: To support, encourage and facilitate the production of energy from renewable sources, such as from solar energy, hydro energy, wave/tidal energy, geothermal, wind energy, combined heat and power (CHP), heat energy distribution such as district heating/cooling systems, and any other renewable energy sources, subject to normal planning and environmental considerations.

Policy CEE12 - Transition to a Low Carbon, Climate Resilient City Economy: To support the transition to a low carbon, climate resilient city economy, as part of, and in tandem with, increased climate action mitigation and adaptation measures.

Policy SI49 - Support for Energy Utilities - To support the development of enhanced electricity gas supplies, and associated transmission and distribution networks, to serve the existing and future needs of the City, and to facilitate new transmission infrastructure projects and technologies including those to facilitate linkages of renewable energy proposals to the electricity and gas transmission grid that might be brought forward in the lifetime of this Plan. In this respect, the City Council will have regard to the 'Guiding Principles' for facilitating the provision of energy networks set out by the Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy (2019-2031).

Policy SI51 - renewable Energy Use and Generation - To promote renewable energy generation, use and storage at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050.

Objective SIO28 - EirGrid Development Strategy - To support EirGrid's Grid Development Strategy - Your Grid, Your Tomorrow (2017), Implementation Plan 2017 – 2022 and

Transmission Development Plan (TDP) 2016 and any subsequent plans prepared during the lifetime of this Plan, in order to provide for the safe, secure and reliable supply of electricity.

Objective SIO30 - Facilitating Offshore Renewable Energy - To support the sustainable development of Ireland's offshore renewable energy resources in accordance with the National Marine Planning Framework (2021) and Offshore Renewable Energy Development Plan (2019) and its successor, including any associated domestic and international grid connection enhancements.

PLANNING HISTORY

There has been limited relevant previous development in the maritime area. The onshore development area primarily consists to the public roadway within the Dublin City Council area.
SID/02/23:
Application lodged to An Bord Pleanala for the development of up to approximately 24 kilometres (km) of underground cable (UGC) at various locations in North Dublin between Forrest Little, Belcamp, Clonshaugh and Harristown, County Dublin. The primary purpose of the proposed UGCs is to provide electrical power to the proposed MetroLink project (ABP Case reference: 317831).

INTERNAL REPORTS:

Environment & Transportation Department
No objection subject to recommended conditions. Content of report included below.

PLANNING ASSESSMENT

The Dublin City Development Plan 2022-2028 (DCDP) was adopted on the 2nd of November 2022 and came into effect on the 14th of December 2022. The DCDP aims to guide the City to develop in a manner to meet the needs of its residents, visitors and workers.

The vision of the DCDP 2022-2028 is to champion compact city living, distinct character, a vibrant culture, and a diverse, smart, green, innovation-based economy. DCC aims to establish the City as one of Europe's most sustainable, dynamic, and resourceful city regions. Decarbonising the energy sector, by facilitating a shift from fossil fuels to low-carbon energy sources, forms a key element of the climate action policy within the DCDP.

The DCDP recognises that wind power will make the most significant contribution to the achievement of national renewable energy targets and as such it is clear that the proposed development will support the delivery of large-scale offshore wind power which will make a large contribution to the achievement of the national renewable's energy target of 80% renewables by 2030 in Ireland.

The proposed development is situated close to one of Ireland's major load and growth centres in the Greater Dublin Area and as such supports the delivery of EirGrid's strategic aims in supporting the growth of the electricity network.

A short section of the onshore cable route of the proposed development will be located in Dublin City where the onshore cable connects to the National Grid Transmission Network at Belcamp Substation

Zoning Objectives
The drawings submitted indicate that the onshore cable route within DCC administrative boundary will be routed along public roads as much as possible apart from where it is necessary to divert the route off the road for technical reasons. It is considered the proposed onshore cable route does not contravene zoning objectives of the DCDP.

Development Management

The Applicant has stated that the DCDP provides for many other development management policies which have been carefully considered in the design of the proposed development. Of particular relevance is the submission of a detailed assessment of policy objectives relating to seascape, landscape and visual impact have been presented in Volume 5, Chapter 29 of the EIAR submitted in support of this application.

Visual Impacts:
Based on the submitted drawings for Option 1 & 2, there are no designated scenic routes or views within Dublin City Council's jurisdiction that are deemed to have a significant or moderate visual impact. The Applicant has stated that views from Dublin Bay (represented by VP34 and VP35) are dominated by the rich diversity of industrial, port, commercial and residential development that surrounds the mouth of the river Liffey and northern half of Dublin Bay.

There is the low sand spit of Bull Island backed by low lying land at Baldoyle and Sutton that lies west of Howth Head and affords potential views of the proposed turbines above this aspect of north Dublin from VP34. There may be views of blade sets / tips rotating against the intervening built and vegetation skyline. However, The Applicant states that it should be considered that such views could only occur in the very clearest of viewing conditions at distances beyond 37km and will therefore be rare and available only with scrutiny, especially in the dynamic context of Dublin Bay. The Seascape, Landscape & Visual Report states that the resulting visual impact significance is deemed to be Slight-imperceptible at VP34 and the turbines will be fully screened from view at VP35.

Overall, it is considered that the Seascape, Landscape & Visual Report gives a clear and unambiguous indication of the visual impact of the proposal and on balance there are not considered to be any significant visual effects arising from the offshore elements of the proposed development. This is considered acceptable.

On-shore Cabling:
As with the assessment of seascape effects for the proposed offshore infrastructure, the assessment of effects for onshore infrastructure begins with the assessment of landscape receptor sensitivity. This is structured around the underlying landscape character units identified in each of the relevant county development Plans. The relevant portion of this jurisdictional area is a small section of the northern suburban area of Dublin City near Clarehall. The submitted documentation states that landscape sensitivity of this area is deemed to be Low.

A small section of the Dublin City Council jurisdiction is encountered by the onshore cable route near the intersection of the R107 and the R139 at Northern Cross. The Mayne River defines the boundary between Fingal and Dublin and the cable route runs along the R139 within Dublin City in the direction of Belcamp substation. An alternative route option also runs from Kinsealy along Temple Road and Hole in the Wall Road before connecting back to the R139 at Donaghmede.

Only the construction works and activity for road sections of the onshore cable route will be noticeable within / adjacent to this urban section of Dublin City. The Applicant has stated that this represents a localised transient / temporary adverse impact that is similar in nature to general road works in terms of its scale and nature.

The Applicant has stated that the predicted magnitude of change associated with the cable trenching / laying is deemed to be Low-negligible / Neutral- in terms of magnitude and quality during the construction stage.

Environmental Impact Assessment

An Environmental Impact Assessment Report has been submitted with the application. An Bord Pleanála are the competent authority with regard to Environmental Impact Assessment and should therefore satisfy themselves regarding the adequacy of documentation submitted.

Appropriate Assessment
An Bord Pleanála are the competent authority with regard to Appropriate Assessment and should therefore satisfy themselves regarding the adequacy of documentation submitted in this respect.

ENVIRONMENT & TRANSPORTATION DEPARTMENT COMMENTS

INTRODUCTION
This report sets out Environment & Transportation Department's (E&T Department) comments on the application made to An Bord Pleanala for the North Irish Sea Array wind farm development. The application has been reviewed by the relevant technical and operational divisions within E&T Department. Some general comments regarding the proposed development are provided below followed by specific comments by E&T Divisions and a set of recommended conditions.

GENERAL COMMENTS

Proposed Development
The subject application is for an offshore wind farm located off the east coast of Ireland. It is comprised of offshore and onshore infrastructure and will have an operational life of 35 years. The offshore infrastructure is located off the coast of counties Dublin, Meath and Louth. The onshore infrastructure is located in the Fingal County Council and Dublin City Council administrative areas. In summary the proposed development is comprised of the following:

<u>Offshore Infrastructure</u>
• Offshore wind turbine generators (WTGs) and their associated foundations
• Inter-array cables which will connect the WTGs to the Offshore Substation Platform (OSP)
• An OSP and associated foundations
• Offshore export cable(s) which will deliver the generated power from the OSP to the high-water mark (HWM) as defined by Ordnance Survey Ireland mapping, (the HWM being the transition point between the offshore and onshore infrastructure)

<u>Onshore Infrastructure</u>
• Offshore export cable(s) from the HWM to the landfall transition joint bays (TJBs)
• Transition joint bays (TJBs) where the offshore and onshore export cables are joined
• Onshore export cable(s) from the TJBs to the grid facility
• A Grid Facility, comprising a compensation substation and Bremore substation, together within ancillary infrastructure.
• Onshore cable(s) from the grid facility to the Belcamp Substation
• A connection from the onshore cable(s) to the national electricity transmission network at Belcamp Substation

Works within Dublin City Council Area
The onshore works within Dublin City Council's jurisdiction include 2 no. underground 220 KV cables running within the public road from the Belmayne/Clongriffin area to the Belcamp ESB sub station located off the R139. A number of joint bays are proposed along the cable route also which are of a significant size. The application makes reference to ground markers/plates to be placed at intervals along the route but little detail appears to have been provided on same.

The subject application includes some elements of flexibility. The 'red line' for the application extends to the full width of the Public Road with the cable route shown indicatively running centrally in the carriageway. The application documentation submits that the proposed development boundary provides for local flexibility regarding the placement of project infrastructure. It is further submitted that whilst in some locations this means that the proposed development boundary is larger than the likely final construction footprint, this approach provides confidence that the proposed development will be constructable entirely within the proposed development boundary. The proposed cable infrastructure centreline is shown generally central within the public road but may change within the proposed development boundary subject to the location of other infrastructure within the roadway.

Further flexibility is included in the application as two route options are proposed for the cable route within the Dublin City area, availing of either the R107 Malahide Road or the Hole in the Wall Road before connecting to the R139. In addition, the application proposes different potential methods of construction e.g. single or double trenches.

E&T General Requirements
E&T Department is supportive of renewable energy developments in line with National, Regional and City policy. The key objectives of the proposed development as stated in the application are noted, they being to develop an environmentally acceptable and feasible offshore wind farm, contribute to the delivery of the Irish Government's legally binding renewable energy target of 5GW by 2030, deliver benefits on a local, regional, and national level and to limit the effects of global climate change. Where the subject and other such developments are permitted, Dublin City Council will work proactively with developers to facilitate the implementation of such developments through normal planning and licensing processes.

With regard to the subject application, the scale and extent of works proposed within the public road network in the Dublin City Council area and the flexibility regarding how such works may be implemented are noted. If permitted, a significant amount of time prior to commencement of development will be required to prove the cable route through site investigations, to agree joint bay locations and to agree methods of construction including format of trench works etc. The works will require a Road Opening License and agreement will need to be reached on the above prior to application for a Road Opening License. Reinstatement will at a minimum be required to comply with the 'Guidelines for Managing Openings in Public Roads' (often referred to as 'the purple book') but the extent and detail of reinstatement required may be decided on a case by case basis having regard to the specific location and environment.

In addition to proving the route and agreeing details of construction in advance of development commencing, the applicant will be required to agree an overall construction management plan for the project including construction traffic management plans and road closures etc. This will have to take cognisance of cumulative construction activity arising from planned and permitted infrastructure projects in the development area such as Metrolink and associated electrical upgrades Clongriffin to City Centre Bus Connects and Dublin City Council Active Travel projects.

Proactive communication throughout the project will be crucial. The implementation of the proposed communication plan and the appointment of liaison officers is important for engagement with the Local Authorities as well as local communities.

Engagement prior to commencement of development and oversight of the construction of the development within the public road will require considerable resource input from Dublin City Council, some of the costs of which it is considered should be borne by the applicant.

COMMENTS BY DIVISION

Roads Maintenance Services (RMS)
A condition stating that the requirements of RMS should be met at construction should be included.

Notwithstanding, the following issues are required to be addressed in order to manage the impact on the road network:

1. Proper assessment of the route is required at pre-commencement stage. Green space, road verge or footpath preferable. Joint bays particularly problematic.
2. 'Purple Book' (Guidelines for Managing Openings in Public Roads) standards are the basic minimum requirements for permanent reinstatement. Site specific conditions also required, otherwise Dublin City Council may end up with a patchwork quilt of reinstatement.
3. The joint bays require purpose built lids to prevent reflective cracking in the road surface.
4. Site investigation (SI) required to prove route under the public road.
5. Marker plates on public road are not desirable. Reference in the NISA planning application documents but no details given.
6. Straight runs of proposed service preferable, otherwise sterilisation of additional underground space will happen.
7. Technical Acceptance Report (TAR) process required for joint bays.
8. Operations and Maintenance (O & M) manuals required prior to commencement of works.
9. Stakeholder engagement and communications plan required.
10. Developer to fund site supervision on behalf of Dublin City Council.
11. Reasonable time is required for planning compliance prior to construction, to enable Dublin City Council teams to process/ approve documentation.

District Heating Project
Dublin City Development Plan policy supports the production of energy from renewable sources (CA11) and encourages the development of low carbon and highly efficient district heating and decentralised energy systems (CA15). In this regard, Dublin City Council encourages the future integration of the North Irish Sea Array Wind Farm with future potential district heating networks in the North Fringe area of the city, should they be developed. A future connection point that allows for integration to a district heating network would be mutually beneficial to both developments and if feasible, should be identified and included.

Traffic
Although the majority of this project is outside the Dublin City Council area it does impact on major routes into the Dublin City Council area in particular on R107/ Malahide Road and also on the R139 There are a number of major projects in the area which will need to be considered as part of this installation, they include the MetroLink (including advanced works) and the Clongriffin to City Centre Bus Connects project.

Prior to the commencement of development, the developer shall submit for the written agreement of Dublin City County Council a phasing plan for the cabling works proposed. The following details should be provided as part of this agreement:

- The exact location/route of the ducting trench within each individual section of roadway, particular care should be taken to ensure that the ducting route impacts existing services as little as possible along the route.
- The layout and depth of the ducting trench cross section.
- The developer should map all existing DCC ITS equipment in the area and will be responsible for the replacement of any equipment which is damaged during the works.

- The exact details for road reinstatement works for each individual section of road shall be as per the ‘Guidelines for Managing Openings in Public Roads’ (often referred to as ’the purple book’).

The phasing of the proposed works on the public road shall be agreed with Dublin City Council prior to the start of the works, this plan should include the phasing dates and duration of any proposed ‘road closures’ on the public road. Road closures should be kept to an absolute minimum and shall only be granted as a last resort and for a short duration once all other alternatives have been fully explored as potential road closures in the DCC areas in particular would likely result in significant local disruption to traffic in both the DCC and FCC areas. The developer will have to ensure that the works are coordinated so as to avoid the proposed development works conflicting with various planned and permitted developments along the proposed cable route. For any roadworks or closures that affect bus routes, agreement with the National Transport Authority (NTA) and notification of the bus operators must be confirmed prior to the works commencing.

Drainage Planning, Policy and Development Control (DPPDC)
The Drainage Planning, Policy and Development Control (DPPDC) section has no objection to this development, subject to the developer complying with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0. In particular, the required separation distances between new utilities/cables and existing public surface water sewers, as specified in Section 3.13 Utilities, shall be adhered to.

There are a number of locations where the proposed cable routes cross or run alongside existing public surface water infrastructure. Prior to the commencement of construction, the developer shall agree detailed plans for these interface locations with the Drainage Planning, Policy and Development Control (DPPDC) section.

There are a number of locations where the proposed cable routes are shown to cross under the River Mayne. Prior to the commencement of construction, full details of the proposed crossings, including method of construction and flood risk management, shall be submitted for agreement to the DPPDC section.

Records of public surface water sewers are indicative and must be verified on site. The developer must carry out a comprehensive site survey to establish all public surface water sewers that may be on the site. If surface water infrastructure is found that is not on public records the developer must immediately contact the DPPDC section to ascertain their requirements. Any damage to existing public surface water sewers shall be rectified at the developer's expense.

Air &Noise
Air Quality:
The assessment methodology, mitigation and monitoring measures as detailed in Chapter 27 of the EIA assessment report on Air Quality shall be adhered to in full. The cumulative effects of all activities on site shall be considered at all times. Should exceedances be recorded, the Air Quality assessment methodologies/mitigation measures shall be adapted to ensure limits are complied with.

Noise and Vibration:
The assessment methodology, mitigation and monitoring measures as detailed in Chapter 30 of the EIA assessment report on Noise and Vibration shall be adhered to in full. The cumulative effects of all activities on site shall be considered at all times. Should exceedances be recorded, the Noise and Vibration methodologies/mitigation measures shall be adapted to ensure limits are complied with.

RECOMMENDED CONDITIONS

The Planning Authority recommends that certain conditions be attached should An Bord Pleanála be minded to grant permission for this development

1. Insofar as the Planning & Development Act 2000 (as amended) and the Regulations made thereunder are concerned the development shall be carried out in accordance with the plans, particulars and specifications lodged with the application, save as may be required by the conditions attached hereto. For the avoidance of doubt, this permission shall not be construed as approving any development shown on the plans, particulars and specifications, the nature and extent of which has not been adequately stated in the statutory public notices.

   Reason: To comply with permission regulations

2. Prior to commencement of development, the applicant shall engage with Dublin City Council regarding the methodology and programme for agreement of pre-commencement works including those required to prove the route and inform the detailed design and layout of infrastructure. In this regard, the applicant is advised to incorporate sufficient time into their overall programme to agree such works.

3. Prior to commencement of development, the applicant shall agree in writing with Dublin City Council:
   a. The exact location/route of the ducting trench within each individual section of road
   b. The layout and depth of the ducting trench cross sections
   c. Location and construction detail of Joint Bays including purpose built joint bay lids
   d. Details for road reinstatement works for each individual section of road. Reinstatement works shall be at a minimum as per the 'Guidelines for Managing Openings in Public Roads' (often referred to as 'the purple book') but may additional reinstatement works as required on a case by case basis having regard to the specific location and environment.

4. Prior to commencement of development, a phasing plan for the overall proposed works on the public road shall be agreed with Dublin City Council.

5. Prior to commencement of development, a Construction Management Plan to include traffic management and road closure proposals, for the overall works within Dublin City shall be submitted for the written agreement of Dublin City Council. This shall take cognisance of planned and permitted developments and infrastructure projects. The plan shall also align with the phasing plan requested at item 3 above.

6. All necessary consents from Dublin City Council shall be obtained before works commence, including the necessary road opening licences.

7. As soon as may be subsequent to permission granted, if An Bord Pleanala is so minded, the applicant shall submit to the Planning Authority a communication plan for the overall project from pre-commencement through construction to operational stages. This shall include liaison details for engagement with the Local Authorities as well as the general public. All costs associated with the communication plan shall be borne by the applicant.

8. Prior to commencement of development, the applicant shall submit for written agreement to the Planning Authority a photographic pre-condition road survey of the entire proposed route for the ducting trench.

9. Any damage caused to the pavement on the existing road network arising from the construction works (e.g. damage of the surface wearing course, etc.) shall be rectified in accordance with TII Pavement Standards and details in this regard shall be agreed with the Road Authority in writing prior to the commencement of any development on site.

Specific Requirements of Technical Divisions:

10. The applicant shall comply with the requirements of **Roads Maintenance Services** throughout pre-commencement, construction and reinstatement stages of development:

    a. Proper assessment of the route is required at pre-commencement stage. Green space, road verge or footpath preferable. Joint bays location

    b. 'Purple Book' (Guidelines for Managing Openings in Public Roads) standards are the basic requirements for permanent reinstatement. Site specific conditions also required, otherwise Dublin City Council may end up with a patchwork quilt of reinstatement.

    c. The joint bays require purpose built lids to prevent reflective cracking in the road surface. Site investigation (SI) required to prove route under the public road.

    d. Marker plates on public road are not desirable. Reference in the NISA planning application documents but no details given.

    e. Straight runs of proposed service preferable, otherwise sterilisation of additional underground space will happen.

    f. Technical Acceptance Report (TAR) process required for joint bays.

    g. Operations and Maintenance (O & M) manuals required.

    h. Stakeholder engagement and communications plan required.

    i. Developer to fund site supervision on behalf of Dublin City Council.

    j. Reasonable time is required for planning compliance prior to construction, to enable Dublin City Council teams to process/ approve documentation.

11. The following requirements of the **Traffic Divisions** shall be complied with:

(i) Prior to the commencement of development, the developer shall submit for the written agreement of Dublin City Council a phasing plan for the cabling works proposed. The following details should be provided as part of this agreement:

- The exact location/route of the ducting trench within each individual section of roadway, particular care should be taken to ensure that the ducting route impacts existing services as little as possible along the route.
- The layout and depth of the ducting trench cross section.

- The developer should map all existing DCC ITS equipment in the area and will be responsible for the replacement of any equipment which is damaged during the works.
- The exact details for road reinstatement works for each individual section of road shall be as per the 'Guidelines for Managing Openings in Public Roads' (often referred to as 'the purple book').

(ii) The phasing of the proposed works on the public road shall be agreed with Dublin City Council prior to the start of the works, including the phasing dates and duration of any proposed 'road closures' on the public road.

(iii) Road closures should be kept to an absolute minimum and shall only be granted as a last resort and for a short duration once all other alternatives have been fully explored as potential road closures in the Dublin City Council areas in particular would likely result in significant local disruption to traffic in both the Dublin City Council and Fingal County Council areas. The developer will have to ensure that they works are coordinated so as to avoid the proposed development works conflicting with various planned and permitted developments along the proposed cable route.

(iv) For any roadworks or closures that affect bus routes, agreement with the National Transport Authority and notification of the bus operators must be confirmed prior to the works commencing.

12. The following requirements of the **Drainage Planning, Policy and Development Control Division** shall be complied with:

(i) The Drainage Planning, Policy and Development Control (DPPDC) section has no objection to this development, subject to the developer complying with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0. In particular, the required separation distances between new utilities/cables and existing public surface water sewers, as specified in Section 3.13 Utilities, shall be adhered to.

(ii) There are a number of locations where the proposed cable routes cross or run alongside existing public surface water infrastructure. Prior to the commencement of construction, the developer shall agree detailed plans for these interface locations with the Drainage Planning, Policy and Development Control (DPPDC) section.

(iii) There are a number of locations where the proposed cable routes are shown to cross under the River Mayne. Prior to the commencement of construction, full details of the proposed crossings, including method of construction and flood risk management, shall be submitted for agreement to the DPPDC section.

(iv) Records of public surface water sewers are indicative and must be verified on site. The developer must carry out a comprehensive site survey to establish all public surface water sewers that may be on the site. If surface water infrastructure is found that is not on public records the developer must immediately contact the DPPDC section to ascertain their requirements. Any damage to existing public surface water sewers shall be rectified at the developer's expense.

13. The following requirements of the **Air Quality Monitoring & Noise Control Unit** shall be complied with:

(i) The assessment methodology, mitigation and monitoring measures as detailed in Chapter 27 of the EIA assessment report on Air Quality shall be adhered to in full. The cumulative effects of all activities on site shall be considered at all times. Should exceedances be recorded, the Air Quality assessment methodologies/mitigation measures shall be adapted to ensure limits are complied with.

(ii) The assessment methodology, mitigation and monitoring measures as detailed in Chapter 30 of the EIA assessment report on Noise and Vibration shall be adhered to in full. The cumulative effects of all activities on site shall be considered at all times. Should exceedances be recorded, the Noise and Vibration methodologies/mitigation measures shall be adapted to ensure limits are complied with.

14. The following requirement of the **District Heating Project Team** shall be complied with:

(i) Dublin City Council encourages the future integration of the North Irish Sea Array Wind Farm with future potential district heating networks in the North Fringe area of the city, should they be developed. A future connection point that allows for integration to a district heating network would be mutually beneficial to both developments and if feasible, should be identified and included in the project. In this regard, the applicant shall engage with Dublin City Council's District Heating Project team with a view to agreeing, where feasible, a connection point for district heating.

15. The following requirement of the **Active Travel Programme Office** (AcTPrO) shall be complied with:

(i) Prior to commencement of development, the applicant shall contact the Active Travel Programme Office on activetraveloffice@dublincity.ie regarding Active Travel Projects within the development area. The outcome of the discussions shall be submitted to the Planning Authority prior to commencement of development for consideration and placement on the public planning file.

Anthony Flynn
Assistant Chief Executive
16th August 2024