
Dublin City Council Observations on the Development of Codling Wind Park

Bord Pleanála Case Reference: OA29N.320768

1. INTRODUCTION

An application has been lodged with An Bord Pleanála for a proposed development known as Codling Wind Park. The project shall consist of between 60 and 75 wind turbine generators to be located 13-22km off the Wicklow coast with energy to be delivered via undersea cabling to a proposed substation to be built on Poolbeg Peninsula, which shall connect to the ESB grid. The project shall have an expected capacity of 1300MW of electricity, which is estimated to have the potential to supply 1 million Irish homes every year.

An Bord Pleanála as the consenting authority, will decide to grant or refuse this application. In terms of Dublin City Council's role, where a marine application is made under section 291 of the Planning and Development Act 2000 as amended, the coastal planning authority(s) for the area(s) may, in accordance with section 291(4) of the Act, prepare and submit a report to An Bord Pleanála within 10 weeks of the making of the application to An Bord Pleanála. The Codling Wind Park project crosses and/or adjoins the functional area of three Coastal Planning Authorities: Dublin City Council, Dún Laoghaire–Rathdown County Council and Wicklow County Council.

Dublin City Council, as a Coastal Planning Authority has prepared this report to be submitted to the An Bord Pleanála. Prior to the submission of this report, Sections 291(6) and (7) of the Act set out that the manager of the coastal planning authority must submit a copy of the report to the members of the authority seeking their views. The members may by resolution, decide to attach recommendations specified in the resolution to the report and where those members so decide those recommendations and the administrator's record shall be attached to the report submitted.

This Report is presented to the members of Dublin City Council on 4th November 2024, prior to submission to An Bord Pleanála. The Chief Executive's Report is due to An Bord Pleanála by 2nd December 2024.

2. BACKGROUND

The application has been lodged with An Bord Pleanála for determination under Section 291 of the Planning and Development Act 2000, as amended. The application was lodged on 6th September 2024 and is due to be decided by 1st April 2025. The application is subject to an EIA procedure. A conditional planning permission is sought for 10 years with an operational lifespan of 25 years. The application, known as the Coddling Wind Park Project, includes both the onshore and offshore components and all associated temporary works.

It is noted that the applicant has undertaken consultations with An Bord Pleanála in accordance with Section 287(1) of the Act.

In terms of context, the applicant was awarded a Foreshore Lease in 2005 for the original Codling Wind Park array site for 220 wind turbines and up to 1100 MW capacity. In 2009, a lease for an extension was applied for, enabling 200 additional wind turbines. The application material submitted outlines that advances in wind turbine technology have in the interim allowed for the refinement of the proposal for a combined Codling Wind Park Project with a maximum 1300 MW export capacity with up to 75 wind turbine generators. The project includes offshore transmission infrastructure, with export cables connecting at Poolbeg.

Maritime Area Consent, which is a right to occupy a specified part of the maritime area and is required before an application for planning permission can be submitted, was granted by the Minister for the Environment, Climate and Communications in December 2022 as part of a phase one consenting process consisting of six offshore renewable energy projects. The applicant has outlined that subsequent amendments have been granted to allow for additional land required at the onshore substation site and to increase navigational safety during construction of the offshore windfarm.

3. PRE PLANNING MEETINGS

The applicant undertook statutory pre-application consultations with An Bord Pleanála during 2023 and 2024 and met with representatives of An Bord Pleanála on five occasions during the process. An Bord Pleanála subsequently issued a Board Direction on 15th May 2024 (ABP-315809-23).

4. SITE LOCATION

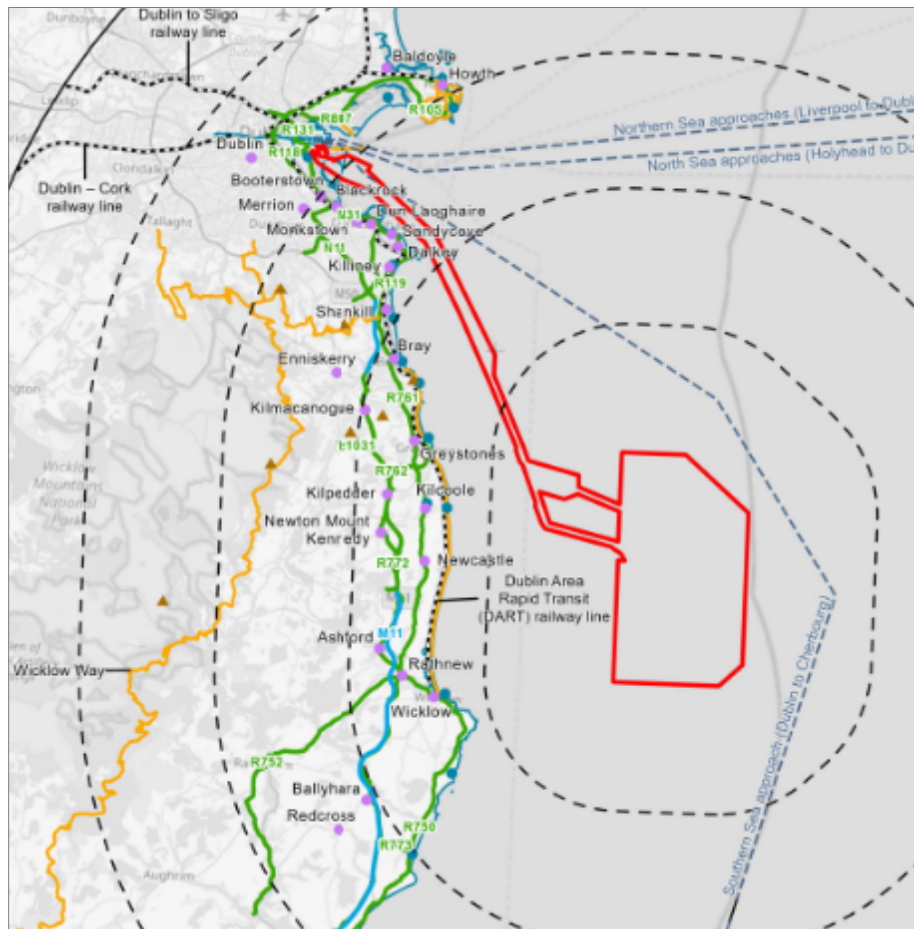


Figure 1: Site location

The application site for the offshore wind farm is located in the Irish Sea approximately 13-22km off the Wicklow coast, between Greystones and Wicklow Town, to be situated on Codling Bank.

The proposal includes both offshore and onshore components with onshore transmission infrastructure to consist of an onshore substation to be located on the peninsula to the west of the existing ESB Networks 220kV substation on the northern side of the Poolbeg Peninsula on land extending from the landfall site.

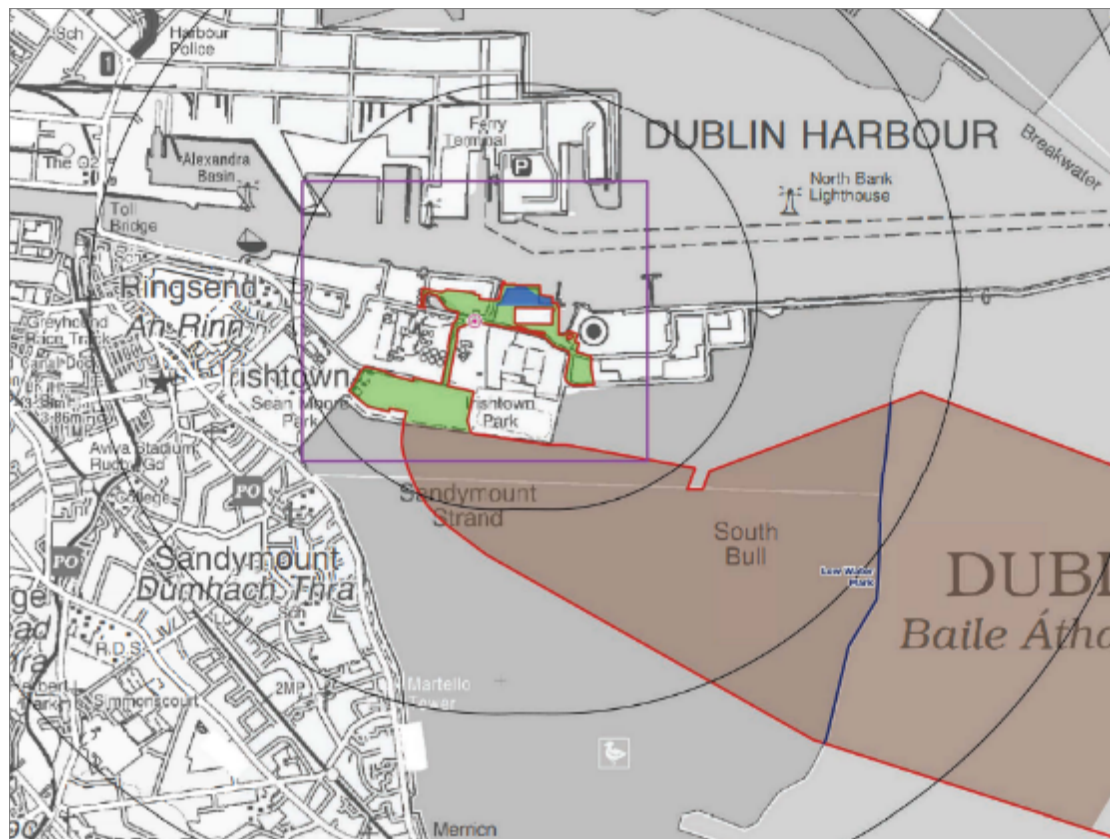


Figure 2: Site location - Onshore development & landfall

5. 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 Wicklow and onshore infrastructure within the Dublin City Council administrative area at Poolbeg Peninsula.

The project is set out into four elements:

1. The Generating Station

This comprises the wind turbine generators, inter-array cables and interconnector cables.

The proposal provides for two layout options in terms of the number and size of the wind turbine generators:

- Option A consists of 75 wind turbine generators with a rotor diameter of 250m and an overall height of 287.72m from the lowest astronomical tide
- Option B consists of 60 wind turbines generators with a rotor diameter of 276.72m and an overall height of 313m from the lowest astronomical tide.

The applicant is seeking permission for both layout options, with only one option to be constructed. The applicant has outlined that the models under discussion are not yet in production. The array site boundary and overall planning application boundary remains the same for both options.

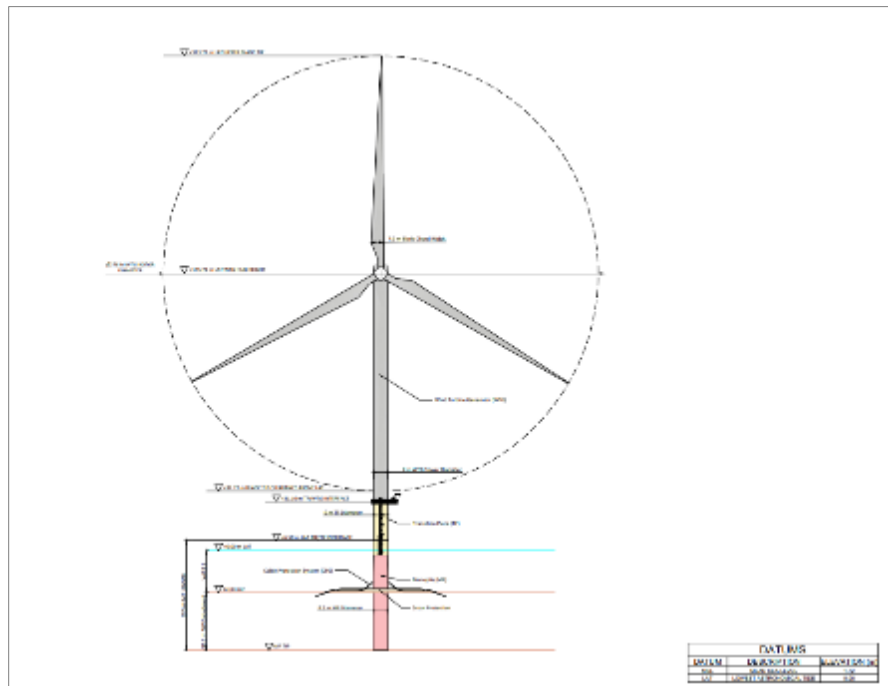


Figure 3: Wind Turbine Generator (Option A)

2. The offshore transmission infrastructure / Transmission Component 1

This component comprises of three offshore substation structures and three offshore export cables, which will transport the energy from the offshore substation structures to the proposed onshore substation at Poolbeg Peninsula.

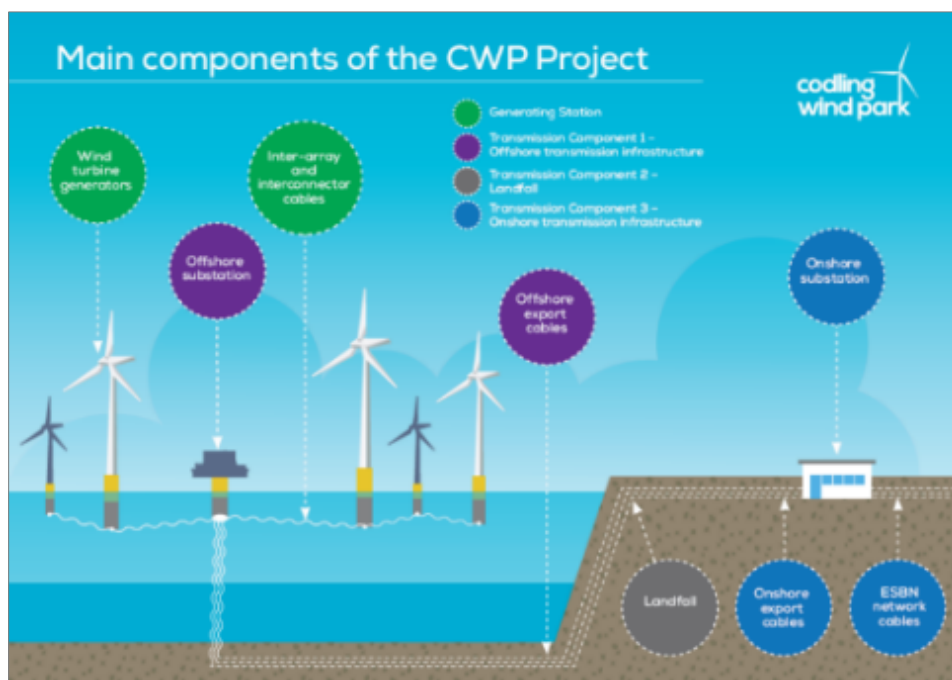


Figure 4: Extract from applicant's Planning Report illustrating the main project components and how they relate to each other

The offshore substation structures shall be located within the array site with the size and location to remain the same for both option A and option B. Flexibility is sought in relation to the dimension of the offshore substation structure mono pile foundations in respect of height, diameter, length, embedment depth and grout volume. Whilst preferred locations for the offshore substation structures including foundation scour protection, are described, and these are the same for the two options, limited locational flexibility is sought in the form of a limits of deviation around the centre point of each offshore substation structure. Preferred alignments for the offshore export cables are described, with limited locational flexibility sought in the form of a defined limit of deviation.

3. The landfall / Transmission Component 2

This is the point at which the offshore export cables are brought onshore and are connected at three transition joint bays (separate underground chambers) to the onshore cables. The site located for landfall is on the southern edge of Poolbeg Peninsula. As described in the EIAR submitted, the landfall represents a complex interaction between land and the marine environment with the landfall cable ducts to be installed within a defined limit of deviation boundary with a width of 30-55m.

The scope of the landfall includes three stages: firstly, non-ducted offshore export cable laying in the intertidal area from the limits of vessel operability at 4km from the high water mark to c.350m from the high water mark; secondly, ducted offshore export cable laying, referred to as intertidal cable ducts from the seaward extent of the landfall cable ducts, just below the high water mark to approximately 350m from the high water mark; and thirdly ducted offshore export cable laying, referred to as the landfall cable ducts, extending from the transition joint bays onshore to the intertidal area, just below the high water mark.

Preferred locations of the transition joint bays, in addition to the preferred alignment of the landfall cable ducts, intertidal cable ducts and intertidal offshore export cables (non-ducted sections) out to approximately 4km from the high water mark, are described within a defined limit of deviation.



Figure 5: Onshore development area

4. The onshore transmission infrastructure / Transmission Component 3

This comprises the onshore export cables, the onshore substation and associated infrastructure. The three 220kV onshore export cables will connect to the offshore

export cables at the transition joint bays and will transfer the electricity onwards to the onshore substation proposed.

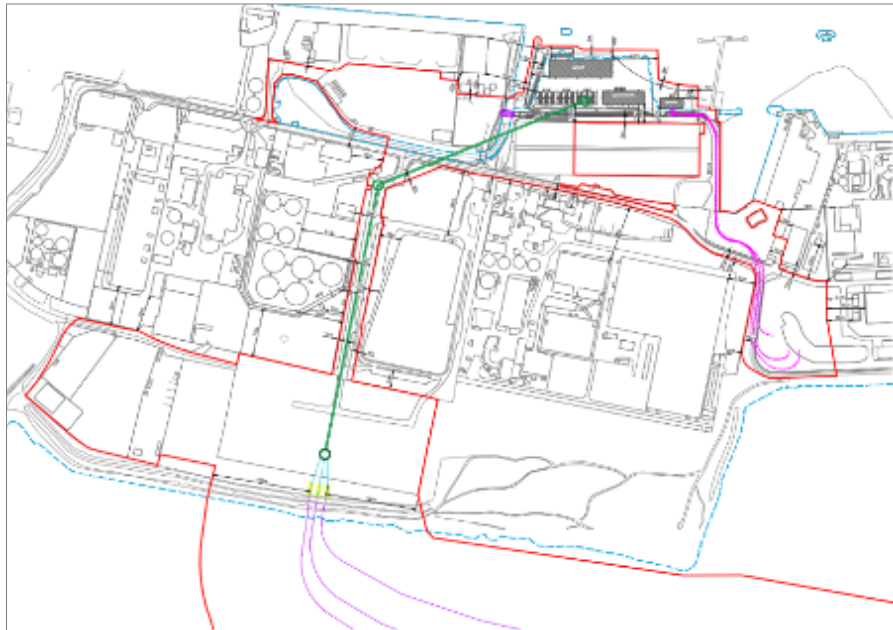


Figure 6: Onshore development area

These will be installed within an underground tunnel that extends from Compound A near the landfall to be routed north approximately 0.7km across Poolbeg Peninsula to the proposed onshore substation site located on the south bank of the River Liffey and adjacent to Pigeon House Hotel and Pigeon House Power Station.

The site of the proposed substation is currently unused land and was reclaimed by Dublin Port Company in the late 1990s / early 2000s and is surrounded by water on three boundaries.



Figure 7: CGI image of proposed substation from Pigeon House Road

The onshore substation will be a gas-insulated switchgear (GIS) design, where the HV equipment is designed to be insulated by pressurised gas. The substation shall include:

- Perimeter structures including upgraded revetments and coastal retaining walls
- Land reclamation for the ESB building
- Raised site platform
- One GIS building
- One ESB GIS building
- One ESB MV building;

- Three shunt reactors (incorporated within the GIS building)
- One statcom building
- Three harmonic filters
- Upgrades to the existing access road from Pigeon House Road to the site entrance
- New bridge to provide vehicle access across the cooling water discharge channel
- New internal access road layout within the site boundary
- Car parking
- Drainage infrastructure

The applicant has also outlined that a temporary construction compound will be required for the site called Compound C. There shall be four compounds in total located across the peninsula in order to facilitate the associated construction works, which shall be made good following completion of development.

6. RELEVANT PLANNING HISTORY

Whilst there has been limited relevant previous development in the maritime area, of note is that this project forms part of a tranche of six offshore renewable energy projects, which were granted Maritime Area Consent by the Minister for Environment, Climate and Communications in December 2022. This was the first time Maritime Area Consents were awarded, with over 4.2GW of capacity expected across the six wind projects, and collectively referred to as Phase One. All of these projects are engaging with An Bord Pleanála. Five out of the six projects are located off the east coast of Ireland.

Phase one projects are outlined below:

1. MAC No. 2022-MAC-001 – Oriel Wind Park
2. MAC No. 2022-MAC-002 – Arklow Bank II
3. MAC No. 2022-MAC-003 & 004 – Bray Bank and Kish Bank
4. MAC No. 2022-MAC-005 – North Irish Sea Array
5. MAC No. 2022-MAC-006 – Codling Wind Park
6. MAC No. 2022-MAC-007 – Skerd Rocks (off west coast)

Bray Bank and Kish Bank shall be located within close proximity to the Codling Wind Park.

There is no recent relevant site history pertaining to the location of the onshore substation and onshore cabling components.

7. 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 tandem with long-term infrastructural requirements as part of the Regional Spatial and Economic Strategy and Metropolitan Area Strategic Plan processes through National Policy Objective 40 which states:

‘Ensure that the strategic development requirements of Tier 1 and Tier 2 Ports, ports of regional significance and smaller harbours are addressed as part of Regional Spatial and Economic Strategies, metropolitan area and city/county development plans, to ensure the

effective growth and sustainable development of the city regions and regional and rural areas’.

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 (OREDPA) and its successors, the progressive development of Ireland’s offshore renewable energy potential, including domestic and international grid connectivity enhancements.

National Marine Planning Framework

Chapter 13: Energy – Offshore Renewable

Objectives of the NMPF include to support the development of offshore renewable energy in Ireland as a driver to significantly reduce greenhouse gas emissions and accelerate the move to cleaner energy in line with national and EU policy. Policy 1 is relevant as outlined below with consideration also given to policies 2 through 11 in Chapter 13.

Offshore Renewable Energy Policy 1 - Proposals that assist the State in meeting the Government’s offshore renewable energy targets, including the target of achieving 5GW of capacity in offshore wind by 2030 and proposals that maximise the long-term shift from use of fossil fuels to renewable electricity energy, in line with decarbonisation targets, should be supported. All proposals will be rigorously assessed to ensure compliance with environmental standards and seek to minimise impacts on the marine environment, marine ecology and other maritime users.

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 Dublin City Development Plan 2022-2028 recognises that wind power will make the most significant contribution to the achievement of national targets for renewable electricity. The Council supports the implementation of the 'Offshore Renewable Energy Development Plan' and will cooperate with state and semi state agencies in relation to the implementation of projects in the Irish Sea. 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 CA13 – Offshore Wind-Energy Production: To support, encourage and facilitate the implementation of the 2014 ‘Offshore Renewable Energy Development Plan’ (OREDPA) and any forthcoming review and to facilitate infrastructure such as grid facilities on the land side of any renewable energy proposals of the offshore wind resource, where appropriate and having regard to the principles set out in the National Marine Planning Framework.

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.

Policy SI52 - Poolbeg Peninsula Strategic Sustainable Infrastructure Hub: To support the development of the Poolbeg Peninsula as a Sustainable Energy and Infrastructure Hub for Dublin with a strategic role in accommodating the City’s critical hard infrastructure and to recognise the significant role that it plays in facilitating Dublin’s transition to a low carbon and climate-resilient city.

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.

8. INTERNAL REPORTS:

Archaeology Section

The comments received highlight the location of the proposed scheme within the Zone of Archaeological Potential for Recorded Monuments, which are listed on the Record of Monuments and Places (RMP) and are subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1994.

'The report outlines that the proposed development includes a substantial onshore area within Dublin Port required to construct both permanent transmission infrastructure and temporary construction compounds. Historic mapping shows that the majority of this area was only reclaimed in the mid-twentieth century. The main archaeological potential therefore lies in the underlying estuary silts. The importance of such deposits was illustrated in 2004 by the discovery of Mesolithic fish traps (c. 6000BC) during the development of the Spencer Dock area (M. McQuade, Licence 06E06684).

The red line boundary of the site partially includes the Zones of Archaeological Potential for three sites listed on the Record of Monuments and Places (RMP). These comprise the Great South Wall (DU019-029001-/DU019-029002-) and the earlier 'Piles' and Ballast Office Wall, and the Pigeon House Fort (DU019-027---). These were constructed in the 18th century as part of substantial efforts to improve and fortify Dublin Port.'

The comments state that the EIAR outlines a substantial number of proposals for mitigation measures in order to avoid, reduce, or offset potential impacts of the project on the archaeological resource. The Archaeology Section agrees with the proposed mitigation measures outlined by the applicant and recommends conditions be attached accordingly in the event of a grant of permission.

City Architect's Division

Comments received from the Council's City Architect's Division outline that *'the design of the buildings proposed should acknowledge the significance of this site as a high profile gateway to the city.'*

In relation to landscape design the following comments are submitted:

- *'Detailed landscape plans are required to assess impacts of publicly accessible areas for the onshore elements of the proposal.*
- *It is expected that the public walkway on the southern shoreline adjacent to Irishtown Nature Park would be improved as part of reinstatement of cable landfall works.*
- *Access should be maintained to publicly accessible areas during construction of the onshore elements of the works, particularly on the forshore.'*

The Division recommends that notwithstanding the industrial context of the site, the proposed access bridge to the site should be accessible to all users and abilities for current and future uses.

It is requested that a condition be attached seeking sample panels of brickwork and all other materials proposed for the onshore building design prior to the commencement of development.

In terms of lighting design, the CA Division seek that external lighting design for the proposed buildings should be considered as part of the design with lighting design and night time views requested.

The CA Division have also sought to clarify whether options are considered for the site to be made accessible to the public as part of a future harbour wall walk / Poolbeg walk.

Conservation

The Conservation Section has submitted comments including recommended conditions in the event of a grant of permission. These are set out later in the report. The Section has outlined that *'whilst it is accepted that there is a wide variety and mix of historic and modern,*

architecturally significant and utilitarian structures throughout the subject site and adjacent environs that form the receiving environment, it is important that surviving historic structures and remnants of the early development of the Poolbeg Peninsula and the Great South Wall are adequately protected and retained where possible during the proposed works.

Height and Design

The proposed height and design of the onshore substation buildings are acceptable in principle and have been designed taking into account the key heights of other buildings within the receiving environment (ref. 2.6 p.22 Architectural Design Statement). If possible to accommodate within the construction build-up, I recommend that a solid brickwork outer layer be considered as it would provide more robust, long-wearing treatment and would be easier to maintain than brick slips. It is understood that the colour of the brick that has been proposed has been chosen to blend with the colour palette of the COVANTA Waste to Energy Facility. The Co recommends that a less box-like form to the upper rainscreen element of the new buildings be considered to reduce their visual impact.

Photomontages

The contextual photomontages submitted (Vol.4) demonstrate that the overall visual impact of the proposed onshore substation buildings on the receiving environment, in addition to the turbines that will be visible on the horizon in the distance, would be negligible.

Fencing

In reference to Drawing CWP-TOB-CON-08-02-DWG-0047 - Onshore substation gates, fencing and security details, and Figure 23.12.02 Existing Viewpoint 3: Pigeon House Road, Figure 23.12.03 Proposed Viewpoint 3: Pigeon House Road – while some of the existing fencing arrangement may be outside the subject site, it is clear that it is an untidy and piecemeal installation. I suggest that there is an opportunity to devise a holistic, consistent and unified approach for the installation of good quality security fencing and gates and recommend that a better arrangement is devised that would improve the overall presentation of the new interventions, and would encourage other stakeholders to improve such perimeter arrangements in the interests of improving the setting of the Protected Structures and the historic landscape.

Paths

Drawings CWP-TOB-CON-08-02-DWG-0015 – 21 illustrate the proposed construction sequence for a temporary path along the southern part of the site (transition joint bays for incoming cables) to facilitate users of the coastal path, which is acceptable in principle. It is not clear how vehicular traffic on the Pigeon House Road accessing the Great South Wall will be facilitated.'

Environment & Transportation Department

The Department 'is supportive of renewable energy developments in line with National, Regional and City policy. It is noted that most of the works will be undertaken on private lands but lands in control of DCC are also impacted. Conditions are therefore recommended in relation to the management of works on roads and minimising impacts from construction.

There should be no impact on the operation of or access to the Dublin Waste to Energy facility during the construction phase of the development, unless with the prior agreement of Dublin City Council and the operator, Encyclis. This includes access at all times to the plant for waste deliveries, contractors and employees, to the maintenance village and car park via Pigeon House Road, Shellybanks Road and to the cooling water channel and pipes area north of Pigeon House Road. Full details of any activities that may impact on the facility should be included in the construction management plan and be subject to agreement with DCC.

The site of the proposed works is within an area of the city that is well used as an amenity space. It is noted that the works will impact on this use by virtue of rerouting footpaths etc. Proactive communication throughout the project will be crucial. The implementation a communication plan and the appointment of liaison officers is important for engagement with the Local Authorities as well as local communities.

Cycle parking is required to be provided for new developments in accordance with the quantitative standards set out in Table 1 of Appendix 5 of the City Development Plan. It is noted that the permanent buildings which comprise the proposed onshore substation require regular on-site staff. Staff cycle parking in accordance with City Development Plan standards should be provided to serve the onshore substation accordingly.

The proposed onshore substation is located within Parking Zone 3 of Map J of the City Development Plan. Surface car parking serving the onshore substation is noted. EV charging infrastructure and future ducting for same should be provided for these spaces in accordance with the requirements of Section 5.0 of Appendix 5 of the City Development Plan.'

Comments by Division

Dublin District Heating Project

'Dublin City Council (DCC) has commenced the planning and design of the Dublin District Heating Project (DDHP). The aim of the DDHP project is to contribute to Ireland's Climate and Energy targets by delivering on Government policy at a European, National and Local level.

The DDHP will include over 7km of buried district heating mains (of varying sizes) servicing existing and new developments within the Poolbeg West Strategic Development Zone (SDZ), North Lotts SDZ and Grand Canal Dock SDZ. The DDHP will also include an Energy Centre which will provide back-up and peak load heating for the network. The Energy Centre will achieve this through stored thermal energy and an additional sustainable fuel source. It is envisaged that development consent for the Energy Centre will be required from An Bord Pleanála. The proposed design of the Energy Centre is being progressed.

A section of the district heating network will be installed within the onshore development area identified in the planning application boundary of the Codling Wind Park (CWP) Project. The proposed location of the Energy Centre for the DDHP is immediately to the south of the Dublin Waste to Energy (DWtE) facility on Dublin Port Company owned lands identified as Area O of the Dublin Port Masterplan 2040. A high voltage (HV) electrical grid connection will be required for the Energy Centre. This will include a customer electricity compound adjacent to the Energy Centre site. Both the proposed Energy Centre and customer electricity compound are also within the onshore development area identified in the planning application boundary of the CWP Project.

The ESB Networks substation supplying the Energy Centre will be located remotely from the Energy Centre site. A HV cable will be required to link the ESB Networks substation with the customer compound adjacent to the Energy Centre site. DCC and the developers of other projects in the Poolbeg area are separately engaging with ESB Networks in relation to grid connections for their developments. It is understood that a future combined HV substation will be required to supply all of the planned development in the area. ESB Networks is responsible for the planning and development of this infrastructure which will require a separate planning approval.



Figure 8: The Onshore Development Area submitted with the Codling Wind Park planning application and the proposed location of the District Heating Energy Centre site (Pink dotted line)

DCC acknowledges the complexities involved in the implementation of the CWP Project. However, DCC would request that the following be taken into consideration by An Bord Pleanála in their assessment of the CWP Project.

Proposed Temporary Works:

The overall construction programme for the CWP Project has assumed construction over a four-year period (48 months) with landfall works proposed to be carried out in Year 2 and Year 3. The duration of the construction of the proposed Energy Centre (including thermal storage) is estimated to be approximately 24 months.

Compound A (area of 19,800 m²) accessed from Shellybanks Road is identified as a temporary construction compound, support area and storage facility for the landfall works, and to support the installation of the onshore export cables. It is proposed it will be established at the commencement of onshore transmission infrastructure (OTI) and will be in place until the OTI works are complete. This will be a period of approximately 30 months.

Compound B (area of 32,300 m²) accessed from Shellybanks Road is identified as a temporary construction compound / laydown area for general cable route and onshore substation construction activities.

The DDHP Team has engaged with the CWP Project as part of the design development so that all parties are aware of the respective proposals including in relation to district heating network routing within the planning application boundary for the CWP Project and pipework routing provision will be required. The route options for district heating pipelines that are being considered by DCC for the DDHP, cross through the Onshore Development Area of the CWP Project (including temporary works Compound A and B). The route options for district heating pipelines have taken into consideration the permanent and temporary infrastructure proposals associated with the CWP Project to ensure that the delivery of the district heating pipework can proceed with minimal impact.

Subject to permission being granted for the CWP Project, Dublin City Council respectfully requests that a condition be included in the permission that will enable the delivery of district heating pipework (and associated infrastructure) within Dublin Port lands and the onshore development area of the CWP Project. The final details of the district heating pipeline route

and associated infrastructure can be agreed in writing with the planning authority in the event of planning permission being granted for the CWP Project.

In addition, subject to permission being granted for the CWP Project, Dublin City Council respectfully requests that a condition be included in the permission in relation to continuation of coordination of timelines and phasing at the implementation stage to ensure the projects will be planned and managed to enable the future delivery of the district heating network and proposed Energy Centre. DCC seeks to ensure that the location, extent and duration of the Temporary Works Compound A and Compound B are coordinated before the construction of the Project. This is to ensure that delivery of the district heating pipework and that pre-construction site investigation works to inform the preliminary design of can be facilitated and proceed without conflict and that detailed proposals and a planning application for the proposed Energy Centre can be developed and advanced.'

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 and proving of the route is required at pre-commencement stage.*
- 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. Site investigation (SI) required to prove route under the public road.*
- 4. Marker plates on public road are not desirable.*
- 5. Straight runs of proposed service preferable, otherwise sterilisation of additional underground space will happen.*
- 6. Technical Acceptance Report (TAR) process required for joint bays.*
- 7. Operations and Maintenance (O & M) manuals required prior to commencement of works.*
- 8. Stakeholder engagement and communications plan required.*
- 9. Reasonable time is required for planning compliance prior to construction, to enable Dublin City Council teams to process/ approve documentation.'*

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.

Applicant should consult with Drainage Planning, Policy and Development Control (DPPDC) section prior to commencement, to confirm flood risk mitigation measures.

Where proposed works interfere with public surface water infrastructure, detailed plans at interface locations shall be submitted to Drainage Planning, Policy and Development Control (DPPDC) section for written approval prior to commencement of works.

It should be noted that permanent discharge of groundwater to the drainage network is not permitted.

Discharge of groundwater to the public drainage network may be permitted during construction subject to a trade effluent discharge license being obtained from the responsible sanitary and/or local authority as required by the Local Government (Water Pollution) Acts, 1977 and 1990. Please note Uisce Éireann is the sanitary authority responsible for the foul and

combined drainage network. Dublin City Council is the local authority responsible for the storm water drainage network.

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 Quality Monitoring & Noise Control Unit

'This section would recommend that the following conditions be applied, should permission be granted for the Codling Windfarm SID Application.

Noise Control & Air Quality Control – Construction Phase (Onshore Substation)

- A Construction Management Plan shall be submitted to, and agreed in writing, by the Planning Authority, prior to commencement of development. This plan shall be developed with reference to the 'Construction and Demolition Good Practice Guide' produced by the Air Quality Monitoring and Noise Control Unit of Dublin City Council.
- The hours of operation during the construction phase shall be restricted to 7.00am to 6pm, Monday to Friday, and 8.00am to 2.00pm on Saturdays. Permission to work outside of these hours must be subject to the approval of Dublin City Council.

Noise Control – Operational Phase (Onshore Substation)

- The LAeq level measured over 15 minutes (daytime) or 5 minutes (nighttime) at a noise sensitive premises when the substation is operating shall not exceed the LA90 (15 minutes day or 5 minutes night), by 5 decibels or more, measured from the same position, under the same conditions and during a comparable period with no plant in operation.
- For the purposes of potential tonal noise associated with the use the level in hertz measured as a third octave band shall not exceed the neighbouring third octave bands, by more than 5dB when measured as an LLeq (15 minutes day time, 5 minutes nighttime).'

Active Travel

'The Active Travel Programme Office (AcTPrO) have reviewed the plans and particulars of the proposal submitted. Active Travel welcome this proposal and are fully supportive of this significant contribution to the achievement of national renewable energy targets. We recommend that prior to commencement of development onshore, that the applicants shall engage with the Active Travel Programme Office to ensure alignment and co-ordination with any of our Schemes within the Active Travel Network.'

9. PLANNING ASSESSMENT

A ten year planning permission is sought for both offshore and onshore components of an offshore windfarm for up to 75 wind turbine generators offshore and onshore transmission infrastructure to consist of an onshore substation to be located on the northern side of the Poolbeg Peninsula, to the west of the existing ESB Networks 220kV substation. The project in of itself, aligns with the history of power generation and of infrastructural uses on the peninsula, which serve the city.

Dublin City Development Plan Compliance

The Dublin City Development Plan 2022-2028 outlines that the Council will actively support the linkage of renewable energy proposals to the electricity and gas transmission grid with the development of onshore or coastal enabling infrastructure for offshore renewable energy installations also supported in appropriate locations in accordance with the National Marine Planning Framework (2021). The Development Plan further outlines that the importance of Poolbeg Peninsula in providing infrastructure and assets to support the operation of the national grid system, decarbonisation of the energy utilities sector and the deployment of renewables is recognised and the Council will support the development of the peninsula as a Strategic Sustainable Infrastructure Hub for the City with the Council continuing to safeguard national grid infrastructure from encroachment by other developments that could compromise the operation of the energy networks.

Having regard to the nature, scale and location of the proposed development, it is considered that the proposed replacement substation and ancillary works would be consistent with the Z7, Z9 and Z14 zoning objectives. It is considered that the proposed development also aligns with policies CA11, CA13, CCE12, SI49, SI51 and SI52 and objectives SIO28 and SIO30 of the Development Plan, which seek to support the provision of necessary offshore wind energy production and associated energy infrastructure. As such, the principle of the proposal is supported and welcomed subject to compliance of the design and layout with the policies and objectives of the Development Plan.

The generating station & the offshore transmission infrastructure/transmission component 1

The first two components of the project are offshore based and comprise of the generating station and the offshore transmission infrastructure / Transmission Component 1.

Figure 9 below outlines the location of the offshore array, which shall be off the coast of Wicklow, between Wicklow Town and Arklow.

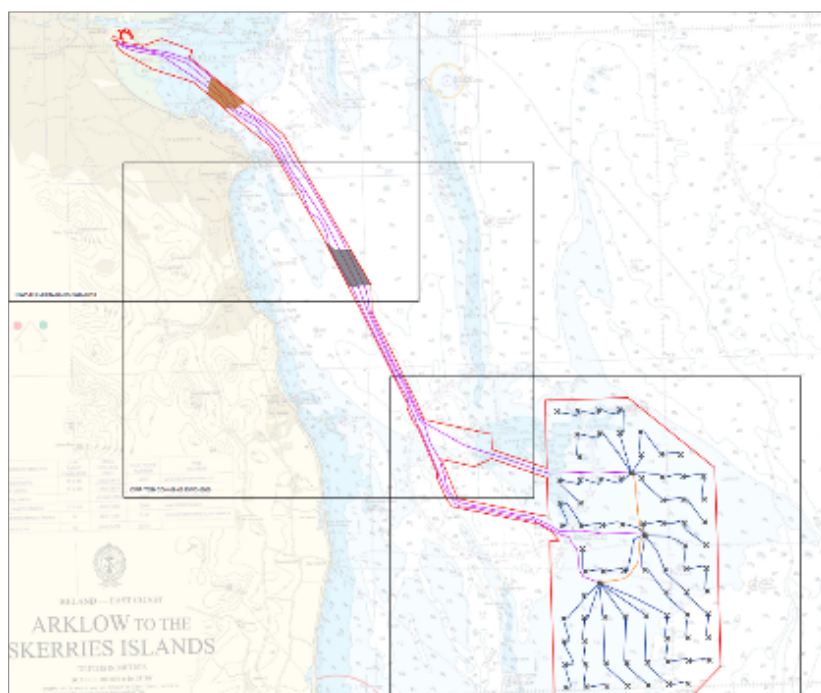


Figure 9: Offshore site layout masterplan for Option A (75 wind turbine generators)

The impact for Dublin City Council, with regard to these two aspects and associated landscape sensitivity, is rated to be medium to low in the viewpoint assessment submitted by the applicant with the distance of the array site from, for instance, the South Wall being approximately 30km. The assessment submitted outlines that whilst the array site would be a noticeable to prominent change in the view with the addition of several features including the offshore transmission infrastructure and the wind turbine generators, these would be of medium to small size and scale spanning over a narrow horizontal field of view and would be seen in the distance over the horizon as demonstrated in figures 10 and 11 below.

Overall, it is considered that the Seascape, Landscape and Visual Impact Assessment gives a clear and unambiguous indication of the visual impact of the proposal for both Option A and Option B. On balance, it is considered that there not any significant visual effects arising from the offshore elements of the proposed development, which is considered to be acceptable.



Figure 10: Option A viewpoint from North Bull Island of wind turbine generators



Figure 11: Wireline drawing of Option A viewpoint from North Bull Island of wind turbine generators

The landfall / transmission component 2, which comes ashore at Poolbeg Peninsula and the onshore transmission infrastructure / transmission component 3, which shall be constructed on Poolbeg Peninsula are considered to likely have more direct impact for Dublin City Council and its surrounds than the offshore elements of the proposal and as such are given further consideration below.

Landfall / Transmission component 2

The proposed landfall, the point at which the offshore export cables are brought onshore at the southern Poolbeg Peninsula and connected at three transition joint bays, shall be made good with the cables to be buried and the transition joint bays to be backfilled with a suitable material, such as thermal cement-bound sand in order that the correct thermal resistivity is provided.



Figure 12: Extent of landfall and temporary access ramp construction areas

The onshore export cables leading from the landfall to the onshore substation and associated infrastructure will be installed within an underground tunnel that extends from Compound A near the landfall to be routed north approximately 0.7km across Poolbeg Peninsula to the proposed onshore substation site.

The cable route extends via Shellybanks Road to Pigeon House Road and runs adjacent to the Dublin Waste to Energy facility and is currently used to access parking for Ringsend Water Treatment Plant and storage areas owned by Dublin Port Company. As such these aspects of the proposal do not raise any concerns in terms of visual impact or amenity, subject to there being no significant effects or likely significant effects to any Natura 2000 area or any real likelihood of significant effects on the environment arising from the proposed development. In that regard, it is noted that the Natura Impact Assessment and the Environmental Impact Assessment Report submitted by the applicant will be assessed by An Bord Pleanála as the determining body.



Figure 13: CGI view from Great South Wall

Onshore substation

The onshore substation shall be situated to the north of Pigeon House Road and Ringsend Waste Water Treatment Plant. The site currently comprises storm water tanks, rough grassland, brownfield land and spoil as outlined by the applicant. A proposed access road linking the onshore substation to Pigeon House Road will extend west from the onshore substation across a proposed bridge over the cooling water discharge channel, before joining Pigeon House Road via the existing access road to Ecocem Dublin Plant. ESBN cabling will also be installed between the proposed onshore substation and the ESB Poolbeg Generating Station.

The substation complex shall range from 29.5m to 35.2m in height with an operational site area of 16,050sqm and a layout that includes three main buildings.

Block 1: STATCOM Block (static synchronous compensator)

Block 2: EirGrid GIS Block (gas insulated substation)

Block 3: ESB GIS Block

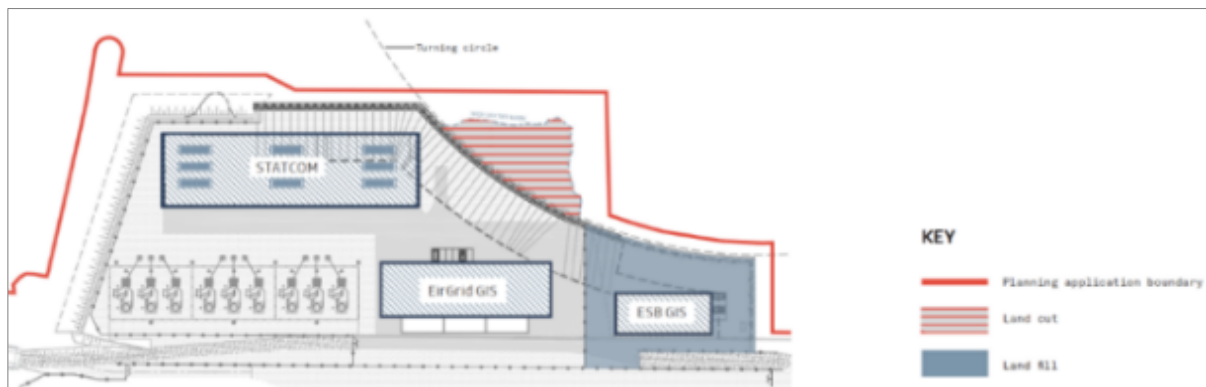


Figure 14: Onshore substation - Poolbeg Peninsula

The proposal also includes an extent of land reclamation adjacent to the onshore substation site in addition to the removal of part of the previously reclaimed land in order to take account of the Dublin Port Company 3FM project, which consists of a proposal to construct a 325m diameter ship turning circle within the River Liffey, immediately in front of the onshore substation site.

The overall height and massing of the substation structures would be commensurate to the industrial nature of the surrounding area, which includes Pigeon House Power Station, the Poolbeg Chimneys, the former Pigeon House Hotel and the Dublin Waste to Energy Facility. The onshore substation shall be adjacent/in close proximity to a number of key historic structures including the Pigeon House Power Station, Poolbeg Chimneys, the former Pigeon House Hotel, the former St. Catherine's Hospital and the Great South Wall.

As outlined by the Conservation Section, 'the following structures located within the development site are included in the current Record of Protected Structures (RPS) include RPS Ref. No. 6793 Former St. Catherine's Hospital: surviving parts, including northern and western site boundary walls; RPS Ref. No. 6797 Former sea wall and sea wall at various locations along Pigeon House Road; RPS Ref. No. 6794 Remnants of Pigeon House Fort, and RPS Ref. No. 8795 - Former Pigeon House Hotel.' The proposed development is located within the wider historic context of the Great South Wall (breakwater) and Lighthouse, to the east of the Poolbeg Peninsula. The Great South Wall ('Former sea wall and sea wall at various locations along Pigeon House Road') is included in the Record of Protected Structures (RPS Ref. No. 6797 and No. 6798 ([Great South Wall to Lighthouse])) and the Poolbeg Lighthouse (RPS Ref. No. 7553).

The details submitted with the application outline that the onshore substation has been developed in a manner, which seeks to reduce the visual impact of the buildings in the context outlined above, with consideration given to material selection, visual massing and colour selection. Materials to be used include brick, stone and industrial metal. The massing of the buildings have been broken up by utilising two materials across the facade, creating an upper and lower layer. These layers are made up of a grey masonry base and metal clad top layer. The layers allow the onshore substation buildings to sit between and stitch together existing buildings in the peninsula, from a historical and contemporary context. The applicant has detailed that the selection of the grey colour was found to be less impactful to other colour options.

The applicant has submitted computer generated images from various viewpoints as part of the Landscape and Visual Impact Assessment. Evidently, the proposal is clearly visible from many key viewpoints in addition to the proximity to Pigeon House Power Station and Pigeon House Hotel. That notwithstanding, the proposal's setting within its wider industrial context in addition to the wider cumulative benefits of the proposed development are given due consideration. Overall, the proposed substation is generally well considered and blends in within the surrounding environment without changing the character of views within the wider area negatively.

Visibility of the project from the south of the peninsula would be limited with the majority of works only noticeable during the construction period. Overall, it is considered that the proposed development would align with the existing industrial character of the area and would therefore be appropriate at this location.

Environmental Impact Assessment

The Planning Authority notes that an Environmental Impact Assessment Report has been submitted as part of the application. This is a matter for An Bord Pleanála to assess, as the competent authority for this application.

Appropriate Assessment

The Planning Authority notes that a Natura Impact Statement (NIS) has been submitted as part of the application. This is a matter for An Bord Pleanála to consider, as the competent authority for this application.

10. 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.
2. The developer shall comply with the requirements set out in the Codes of Practice from the Drainage Division, the Transportation Planning Division and the Noise & Air Pollution Section.
3. During the construction and demolition phases, the proposed development shall comply with British Standard 5228 'Noise Control on Construction and open sites Part a) Code of practice for basic information and procedures for noise control.'
 - a) Code of practice for basic information and procedures for noise control.'
 - (b) Noise levels from the proposed development shall not be so loud, so continuous,

so repeated, of such duration or pitch or occurring at such times as to give reasonable cause for annoyance to a person in any premises in the neighbourhood or to a person lawfully using any public place.

4. The site development works and construction works shall be carried out in such a manner as to ensure that the adjoining street(s) are kept clear of debris, soil and other material and if the need arises for cleaning works to be carried out on the adjoining public roads, the said cleaning works shall be carried out at the developers expense.
5. The applicant shall comply with the following conditions from the Archaeology Section:
 - a) The developer shall implement the proposed mitigation measures relevant to archaeology and cultural heritage outlined in the EIAR in full.
 - b) The developer shall appoint a Project Archaeologist as a member of the project team to oversee all archaeological aspects of the project. The Project Archaeologist will manage archaeological aspects of the project and input on, inter alia:
 - Project planning and design,
 - Scheduling of archaeological mitigation,
 - The development of programmes,
 - The development of construction and procurement strategies,
 - The preparation of contract documentation,
 - The appointment of competent consultant archaeologists,
 - Advance works, construction and potential operational issues.
 - Oversee the archaeological operations carried out by the contractor's archaeological consultants.
 - c) The developer shall provide the necessary funding to fulfil the post-excavation and reporting requirement(s) of the project to a standard that is acceptable to the Minister.
 - d) The Project Archaeologist shall ensure the publication and/or dissemination, as appropriate, the archaeological results of the project.
 - e) The Project Archaeologist shall copy Dublin City Council Archaeology Section with all Section 26 method statements and any reports arising from archaeological mitigation.
 - f) The Project Archaeologist shall provide regular bi weekly (or as otherwise agreed) briefing notes to Dublin City Council Archaeology Section on findings during works.
6. The applicant shall comply with the following conditions from the City Architect's Division:
 - a) Landscape design:
 - i. Detailed landscape plans are required to assess impacts of publicly accessible areas for the onshore elements of the proposal. They need to be provided.
 - ii. It is expected that the public walkway on the southern shoreline adjacent to *Irishtown Nature Park* would be improved as part of reinstatement of cable landfall works. Details of this should be provided.
 - iii. Access should be maintained to publicly accessible areas during construction of the onshore elements of the works, particularly on the forshore. Details should be provided.

- b) Bridge Access from Pigen House Road:
Notwithstanding the industrial context of the site, the proposed access bridge to the site should be accessible to all users and abilities for current and future uses.
 - c) Onshore Building Design:
Subject to grant of planning, the applicant should be conditioned to provide sample panels of brickwork and all other materials proposed prior to commencement.
 - d) Lighting Design:
On account of the scale and prominence of the proposed structures; the external lighting design for the proposed buildings should be considered as part of the design. Lighting design and night time views are requested.
 - e) Public Access:
The applicant shall ensure that consideration is given for the site to be made accessible to the public as part of a future harbour wall walk / Poolbeg walk.
7. 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 include additional reinstatement works as required on a case by case basis having regard to the specific location and environment.
8. Prior to commencement of development, a phasing plan for the overall proposed works on the public road shall be agreed with Dublin City Council.
9. 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.
10. All necessary consents from Dublin City Council shall be obtained before works commence, including the necessary road opening licences.
11. As soon as may be subsequent to permission granted, if An Bord Pleanála 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.
12. 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.

13. Any damage caused to pavements 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.
14. Prior to commencement of the development of the onshore substation, proposals for staff cycle parking serving the onshore substation shall be submitted to, and agreed in writing with the Planning Authority. The proposals shall include the following:
 - a) Justification of the quantity of cycle parking proposed in accordance with the requirements of Table 1 of Appendix 5 of the Dublin City Development Plan, 2022-2028.
 - b) Plans detailing the location, layout and design of the proposed cycle parking. Cycle parking shall be located in a secure, sheltered and well-lit area proximate to the uses served. Cycle parking design shall allow both wheels and the frame to be locked to the stand.
15. Cycle parking shall be in situ and ready for use prior to the operation of the onshore substation.
16. A minimum of 50% of the permanent surface level staff car parking spaces serving the onshore substation shall be equipped with fully functional EV charging points. The remaining spaces shall be designed to facilitate the relevant infrastructure to accommodate future EV charging.
17. The applicant shall comply with the requirements of **Roads Maintenance Services** throughout pre-commencement, construction and reinstatement stages of development:
 - a) Proper assessment and proving of the route is required at pre-commencement stage.
 - 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) Marker plates on public road are not desirable.
 - d) Straight runs of proposed service preferable, otherwise sterilisation of additional underground space will happen.
 - e) Technical Acceptance Report (TAR) process required for joint bays.
 - f) Operations and Maintenance (O & M) manuals required.
 - g) Stakeholder engagement and communications plan required.
 - h) Reasonable time is required for planning compliance prior to construction, to enable Dublin City Council teams to process/ approve documentation.
18. The following requirements of the **Traffic Divisions** shall be complied with:
 - a) 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:
 - i. 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.

- ii. The layout and depth of the ducting trench cross section.
 - iii. The developer should map any DCC ITS equipment in the area and will be responsible for the replacement of any equipment which is damaged during the works.
 - iv. 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').
- b) 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.
 - c) 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.
 - d) 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.
19. The following requirements of the **Drainage Planning, Policy and Development Control Division** shall be complied with:
- a) 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.
 - b) Applicant should consult with Drainage Planning, Policy and Development Control (DPPDC) section prior to commencement, to confirm flood risk mitigation measures.
 - c) Where proposed works interfere with public surface water infrastructure, detailed plans at interface locations shall be submitted to Drainage Planning, Policy and Development Control (DPPDC) section for written approval prior to commencement of works.
 - d) It should be noted that permanent discharge of groundwater to the drainage network is not permitted.
 - e) Discharge of groundwater to the public drainage network may be permitted during construction subject to a trade effluent discharge license being obtained from the responsible sanitary and/or local authority as required by the Local Government (Water Pollution) Acts, 1977 and 1990. Please note Uisce Éireann is the sanitary authority responsible for the foul and combined drainage network. Dublin City Council is the local authority responsible for the storm water drainage network.
 - f) 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.
20. The following requirement of the **District Heating Project Team** shall be complied with:

- a) The CWP project shall facilitate the delivery of district heating pipework (and associated infrastructure) within Dublin Port lands and the onshore development area of the CWP Project. The final details of the district heating pipeline route and associated infrastructure can be agreed in writing with the planning authority in the event of planning permission being granted for the CWP Project.
- b) The applicant shall liaise with the Dublin District Heating Project team to ensure continuation of coordination of timelines and phasing at the implementation stage to ensure the projects will be planned and managed to enable the future delivery of the district heating network and proposed Energy Centre. DCC seeks to ensure that the location, extent and duration of the Temporary Works Compound A and Compound B are coordinated before the construction of the Project. This is to ensure that delivery of the district heating pipework and that pre-construction site investigation works to inform the preliminary design of can be facilitated and proceed without conflict and that detailed proposals and a planning application for the proposed Energy Centre can be developed and advanced.

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

Construction Phase

- a) A Construction Management Plan shall be submitted to, and agreed in writing, by the Planning Authority, prior to commencement of development. This plan shall be developed with reference to the 'Construction and Demolition Good Practice Guide' produced by the Air Quality Monitoring and Noise Control Unit of Dublin City Council.
- b) The hours of operation during the construction phase shall be restricted to 7.00am to 6pm, Monday to Friday, and 8.00am to 2.00pm on Saturdays. Permission to work outside of these hours must be subject to the approval of Dublin City Council.

Operational Phase

- c) The LAeq level measured over 15 minutes (daytime) or 5 minutes (nighttime) at a noise sensitive premises when the substation is operating shall not exceed the LA90 (15 minutes day or 5 minutes night), by 5 decibels or more, measured from the same position, under the same conditions and during a comparable period with no plant in operation.
- d) For the purposes of potential tonal noise associated with the use the level in hertz measured as a third octave band shall not exceed the neighbouring third octave bands, by more than 5dB when measured as an LLeq (15 minutes day time, 5 minutes nighttime).

22. The following requirements of **Dublin Waste to Energy** shall be complied with:

- a) None of the construction and or operational activities shall impact on the operation of the Dublin Waste to Energy facility. Moreover, the construction activities must not hinder or prevent access to the plant, maintenance village and car park by employees, waste deliveries, etc.
- b) DWTE shall be consulted by Codling Wind Park on any construction activity before any works are carried out on, under, over or adjacent to the site and all DWTE reasonable concerns must be addressed prior to commencement of the

activity. This includes, but not exclusive, works on Shellybanks Road, the cooling water channel and pipes area.

- c) Prior to the commencement of development, agreement shall be reached with DCC of the detailed design, temporary works and construction management plan for the bridge over the cooling water channel and pipes. Details of these should be provided at least six months in advance of any proposed construction commencement date, to allow adequate time for a full review by DCC and the Operator.
- d) DCC will require adequate insurances to be provided as mitigation to potential serious impacts of any loss or damage caused by the proposed works to the cooling water channel and pipes.
- e) If there is any activity on/under/ over the DWTE facility (including cooling water channel and pipes) this work must comply with the site EPA licence.

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

Prior to commencement of development onshore, that the applicants shall engage with the Active Travel Programme Office to ensure alignment and co-ordination with any of our Schemes within the Active Travel Network.

24. The applicant shall comply with the following conditions of the Conservation Section:

- a) Provide details of how historic remnants such as the wall fragments of the former Pigeon House Fort and similar shall be protected from damage in the course of the proposed works.
- b) Provide record survey drawings cross-referenced with photographs to record all surviving or hitherto concealed historic fabric that may be affected by the proposed works.
- c) Provide a record of all extant historic fabric/remnants that are to be demolished as part of the proposed works.
- d) Provide clearer, brighter image of the existing perimeter fabric identified in Figure 23.17.02 Existing Viewpoint 8: Dublin Ferry Terminal 1, confirming in particular whether any historic fabric survives on this edge.
- e) Devise a holistic, consistent and unified approach for the installation of good quality security fencing and gates and a higher quality perimeter fencing arrangement that would improve the overall presentation of the new interventions as evidenced in the following documentation: (Ref. Drawing CWP-TOB-CON-08-02-DWG-0047 - Onshore substation gates, fencing and security details, and Figure 23.12.02 Existing Viewpoint 3: Pigeon House Road, Figure 23.12.03 Proposed Viewpoint 3: Pigeon House Road.
- f) A conservation expert with proven and appropriate expertise shall be employed to design, manage, monitor and implement any works that may impact upon historic fragments of Protected Structures and industrial heritage, and ensure adequate protection of the retained and historic fabric during the works. In this regard, all permitted works shall be designed to cause minimum interference to the retained

fabric and the curtilage of the Protected Structures within and adjacent to this site, arising from the proposed development.

- g) In advance of the main works commencing on site, the applicant shall confirm with the Conservation Section if any hitherto unknown / concealed historic fabric is found elsewhere on site. The presence of historic fabric may inform an overall strategy for a design proposal that will enhance the character of the Protected Structure.
- h) The applicant shall engage with the Planning & Property Development Department / Conservation Section in relation to potential impacts on architectural heritage arising from the project implementation and operation, ensuring such impacts are monitored by the design team so as to inform the design and mitigate against any adverse impacts on architectural heritage during rather than after the design process.
- i) The Applicant shall seek the written authorisation of the Conservation Officer for any deviation from the methodology, materials and process described in the documentation submitted.
- j) All works to surviving historic fragments and Protected Structures within the site and affected by the proposed works shall be carried out in accordance with best conservation practice and the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and Advice Series issued by the Department of Housing, Local Government and Heritage. Any repair works shall retain the maximum amount of surviving historic fabric in situ. Items to be removed for repair off-site shall be recorded prior to removal, catalogued and numbered to allow for authentic re-instatement.
- k) All existing original features, in the vicinity of the works shall be protected during the course of the works.
- l) All repair of original fabric shall be scheduled and carried out by appropriately experienced conservators of historic fabric. The architectural detailing and materials in the new work shall be executed to the highest standards so as to complement the setting of the protected structure and the historic area.

Anthony Flynn
Assistant Chief Executive
23/10/2024