

**23<sup>RD</sup> MAY 2023**

**RE: DUBLIN PORT COMPANY – EIRGRID POWERING UP DUBLIN SUBMISSION**

Dear Sir or Madam,

We, Dublin Port Company (DPC), wish to make a submission in relation to the above.

**DPC GENERAL COMMENTS**

**Dublin Port Master Plan 2012-2040**

DPC are a member of the Dublin Infrastructure Forum (DIF), we have engaged extensively with Eirgrid over the past year, through the DIF and directly, to outline the opportunities some of our capital development plans present for some of the proposed route options associated with the Powering Up Dublin project and to also highlight and discuss the challenges posed to our activities by some of the proposed route options through Dublin Port lands.

The Master Plan outlines the development strategy for the Port up 2040. A central objective is the development of the Masterplan 2 (MP2) Project (PA29N.304888) and the proposed third and final masterplan (3FM) project, which DPC plan to lodge with An Bord Pleanála in 2023. Along with these two significant strategic infrastructure developments, the proposals from EIRGRID need to consider the wider Port development including the Alexandra Basin Redevelopment Project (PA 0034); DPC internal road schemes; and DPC Liffey-Tolka project.

DPC's MP2 project is currently at construction tender stage and enabling works for the project have commenced. The planning permission was granted in 2020 and is for a period of 15 years.

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**DPC OBSERVATIONS**

Having regard to the specific proposals that impact DPC lands, operations, and development, we would like to make the following observations:

**Finglas to North Wall - Options A, B & C**

**Principle**

In relation to proposed routes through DPC Lands, DPC are supportive of the proposed Routes and believe the routes can be delivered in tandem with the DPC internal road schemes and the proposed upgrade works on Alexandra Road.

Please Note: On the Eirgrid download map ([https://consult.eirgrid.ie/system/files/materials/2775/Route%20Maps\\_Finglas%20-%20North%20Wall.pdf](https://consult.eirgrid.ie/system/files/materials/2775/Route%20Maps_Finglas%20-%20North%20Wall.pdf)) it incorrectly locates the Northwall Power Station on Tolka Quay Road and all the three route options shown, show the cables entering DPC lands via Tolka Quay Road not Alexandra Road. The routes are however shown correctly on the interactive map.

## **North Wall to Poolbeg – Options D, E & F**

### **Principle**

In relation to proposed routes through DPC Lands, DPC cannot support the routes D, E and F as currently shown on the attached Eirgrid route proposal. We do believe an amended proposed Route F where the route leaves North Wall Station and travels East on Alexandra Road until you reach Terminal Road South is suitable and could be further developed. This route could be delivered in tandem with the DPC internal road schemes, and the proposed upgrade works on Alexandra Road and Terminal Road South and reduce the impact on DPC critical operations.

In relation to the Liffey crossing at Terminal 1 and works on the Southside of DPC lands we again highlight the need for all works in this area to be carefully co-ordinated with DPC's strategically important projects namely, MP2 and 3FM schemes.

### **Option D - North Wall, Alexandra Road East Route & Crossing at T1.**

With regards to the Eirgrid Option D Northwall to Poolbeg. There are 3 main reasons why this option in DPC's opinion, is not viable:

1. Tolka Quay Road - is the primary means of access and egress into and out of the oil zone, there is a secondary means of access via AQE, but we are required to always have a primary and secondary means of emergency access available.
2. The pipelines along the route are zoned hazardous (Zone 2), see attached hazard area classification drawings for the area. Works would therefore be subject to general and hot works permitting requirements, which require significant and onerous work control measures to be in place.
3. As the oil zone operates on a 24/7/365 basis, the works would be required to cease around ship discharge operations, this would mean a long and protracted construction program for Eirgrid.

### **Option E – North Wall, CUA, Oil Zone, T2 & Crossing at T1.**

Therefore, there are 3 main reasons why this option is not in DPC's opinion viable:

1. The proposed route runs through a highly restricted area of the Port, the Common User Area (CUA). The CUA is a live operating Port, the construction of Joint Pits in this location would be highly disruptive to Port Operations.
2. In addition to the CUA section, the route runs through the Oil Zone, this area contains live fuel lines and has very restrictive working arrangements, DPC do not consider it feasible to construct a route through this Zone.
3. Within the Oil Zone, the route is shown along Jetty Road, where fuel is off-loaded from ships, Dublin Port do not consider it feasible to install HV cables in this location.

## **Option F – North Wall, Alexandra Road East Route, Breakwater Road & Crossing at Berth 50A.**

Therefore, there are 2 main reasons why this option is not in DPC's opinion viable:

1. Breakwater Road is an important artery within the Port. This road provides the only access route to DFT (one of two container terminals in the north Port) and Dublin Port Operations Centre. While an east – west crossing of this road can be accommodated a north south route would be extremely impactful on Port Operations.
2. Breakwater Road already has HV cables laid along it, this dictates a route for new cables that would bring construction within the exclusion zones for the Common Oil Pipeline (live Fuel Lines) and Saltwater Firemain, which run parallel.

### **Phasing and Timing**

We appreciate Eirgrid's engagement with DPC to date in relation to these matters and look forward to working closely with Eirgrid to agree workable solutions. We need to agree any implementation strategy and co-ordination of the Eirgrid proposals with DPC's strategically important schemes and to avoid where possible and at least minimise disruption to critical DPC operations.

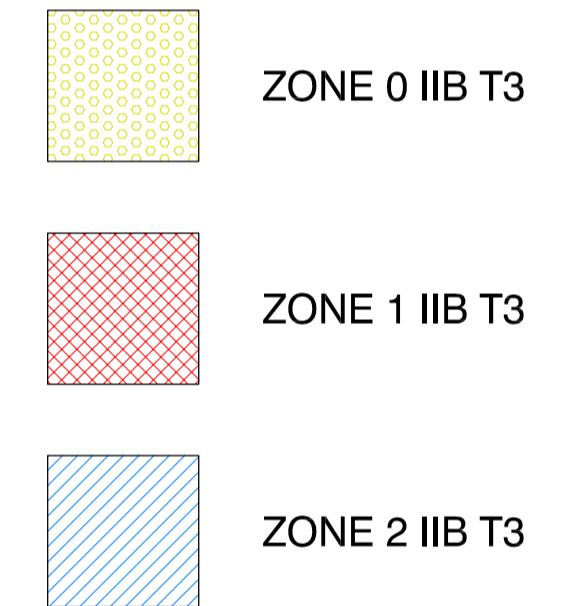
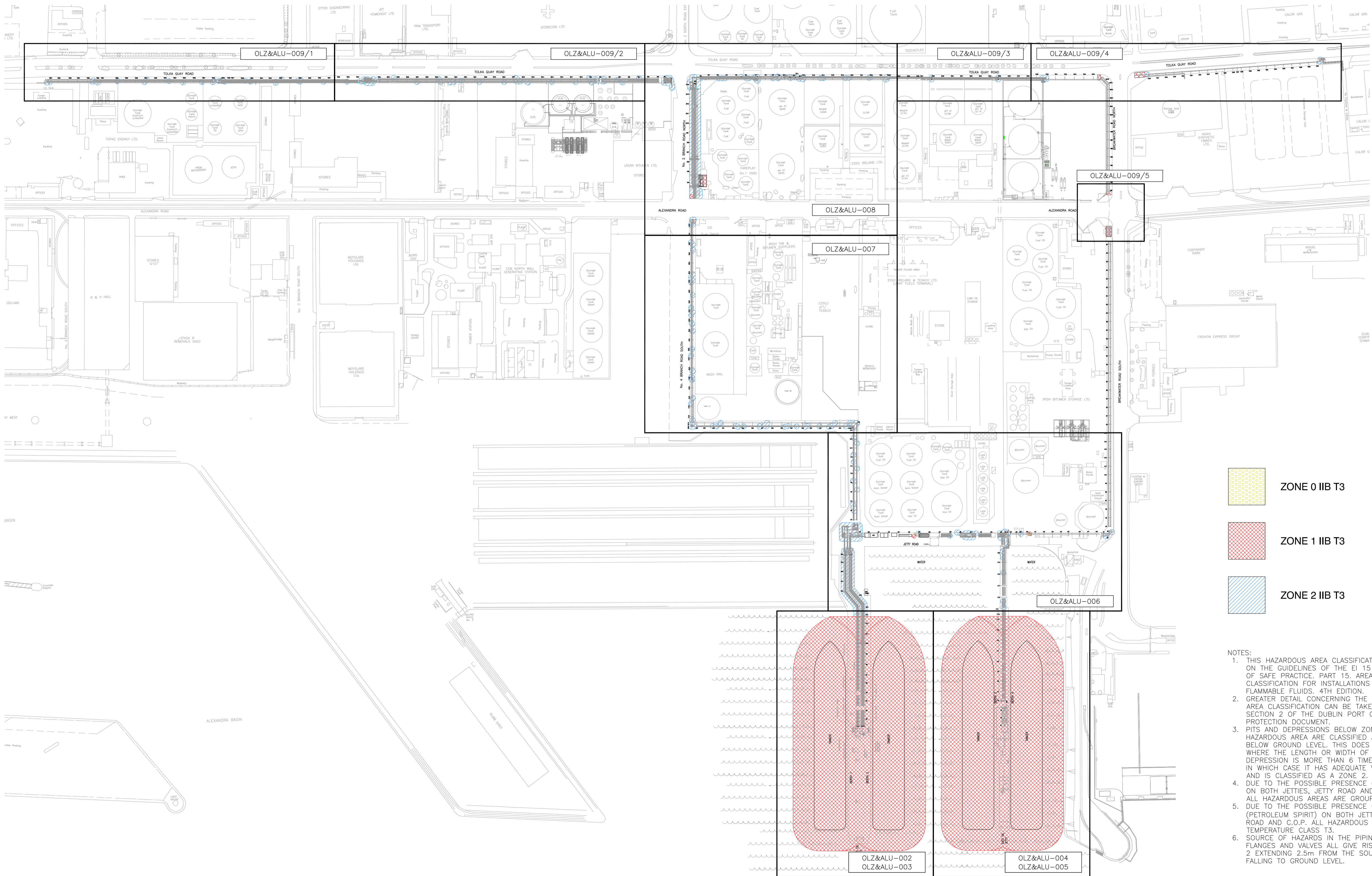
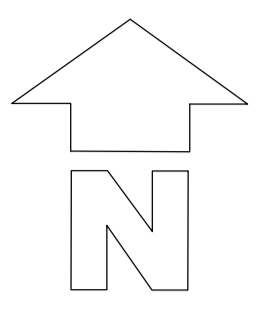
Yours faithfully,



**Ken Rooney**  
**DUBLIN PORT COMPANY**

Attachments:

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- OLZ&ALU-001-1 (DPC Oil Zone Dwg)
  - EIRGIRD Finglas to North Wall (Options A, B and C)
  - EIRGRID North Wall to Poolbeg (Options D, E and F)



- NOTES:
1. THIS HAZARDOUS AREA CLASSIFICATION IS BASED ON THE GUIDELINES OF THE EI 15 MODEL CODE OF SAFE PRACTICE, PART 15, AREA CLASSIFICATION FOR INSTALLATIONS HANDLING FLAMMABLE FLUIDS, 4TH EDITION.
  2. GREATER DETAIL CONCERNING THE HAZARDOUS AREA CLASSIFICATION CAN BE TAKEN FROM SECTION 2 OF THE DUBLIN PORT CO. EXPLOSION PROTECTION DOCUMENT.
  3. PITS AND DEPRESSIONS BELOW ZONE 2 HAZARDOUS AREA ARE CLASSIFIED AS ZONE 1 BELOW GROUND LEVEL. THIS DOES NOT APPLY WHERE THE LENGTH OR WIDTH OF THE DEPRESSION IS MORE THAN 6 TIME ITS DEPTH, IN WHICH CASE IT HAS ADEQUATE VENTILATION AND IS CLASSIFIED AS A ZONE 2.
  4. DUE TO THE POSSIBLE PRESENCE OF ETHANOL ON BOTH JETTIES, JETTIE ROAD AND THE C.O.P. ALL HAZARDOUS AREAS ARE GROUP IIB.
  5. DUE TO THE POSSIBLE PRESENCE OF GASOLINE (PETROLEUM SPIRIT) ON BOTH JETTIES, JETTIE ROAD AND C.O.P. ALL HAZARDOUS AREAS ARE TEMPERATURE CLASS T3.
  6. SOURCE OF HAZARDS IN THE PIPING e.g. FLANGES AND VALVES ALL GIVE RISE TO A ZONE 2 EXTENDING 2.5m FROM THE SOURCE AND FALLING TO GROUND LEVEL.

ASSOCIATED AREA CLASSIFICATION DRAWINGS:  
 OLZ&ALU-001 OVERALL PLAN  
 OLZ&ALU-002 WEST OIL JETTY, SHIP ON  
 OLZ&ALU-003 WEST OIL JETTY, SHIP OFF  
 OLZ&ALU-004 EAST OIL JETTY, SHIP ON  
 OLZ&ALU-005 EAST OIL JETTY, SHIP OFF  
 OLZ&ALU-006 JETTY ROAD  
 OLZ&ALU-007 C.O.P. SOUTH  
 OLZ&ALU-008 C.O.P. CENTRAL  
 OLZ&ALU-009 C.O.P. TOLKA QUAY ROAD WEST, CENTRAL & EAST

1	221119	LC	WEC	FIRST ISSUE	
C	041119	LC	WEC	FINAL DRAFT FOR COMMENT	
B	251019	LC	WEC	SECOND DRAFT FOR COMMENT	
A	040919	LC	WEC	AREA CLASSIFICATION REVIEW SEPTEMBER 2019	
ISS	DATE	DRN	CHKD	APPD	DESCRIPTION
CLIENT				DUBLIN PORT COMPANY & C.O.P.	
PROJECT				HAZARDOUS AREA CLASSIFICATION OF OIL JETTIES & C.O.P.	
TITLE				OVERALL PLAN HAZARDOUS AREA CLASSIFICATION	
DRAWING NUMBER		ISSUE	SCALE	SHT SIZE	
OLZ&ALU-001		1	1/1750	A1	

**EX**perience  
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 Malpas  
 Cheshire, SY14 8PH  
 www.experience.co.uk



**North Wall  
Substation**

**Poolbeg  
Substation**

**Ringsend**

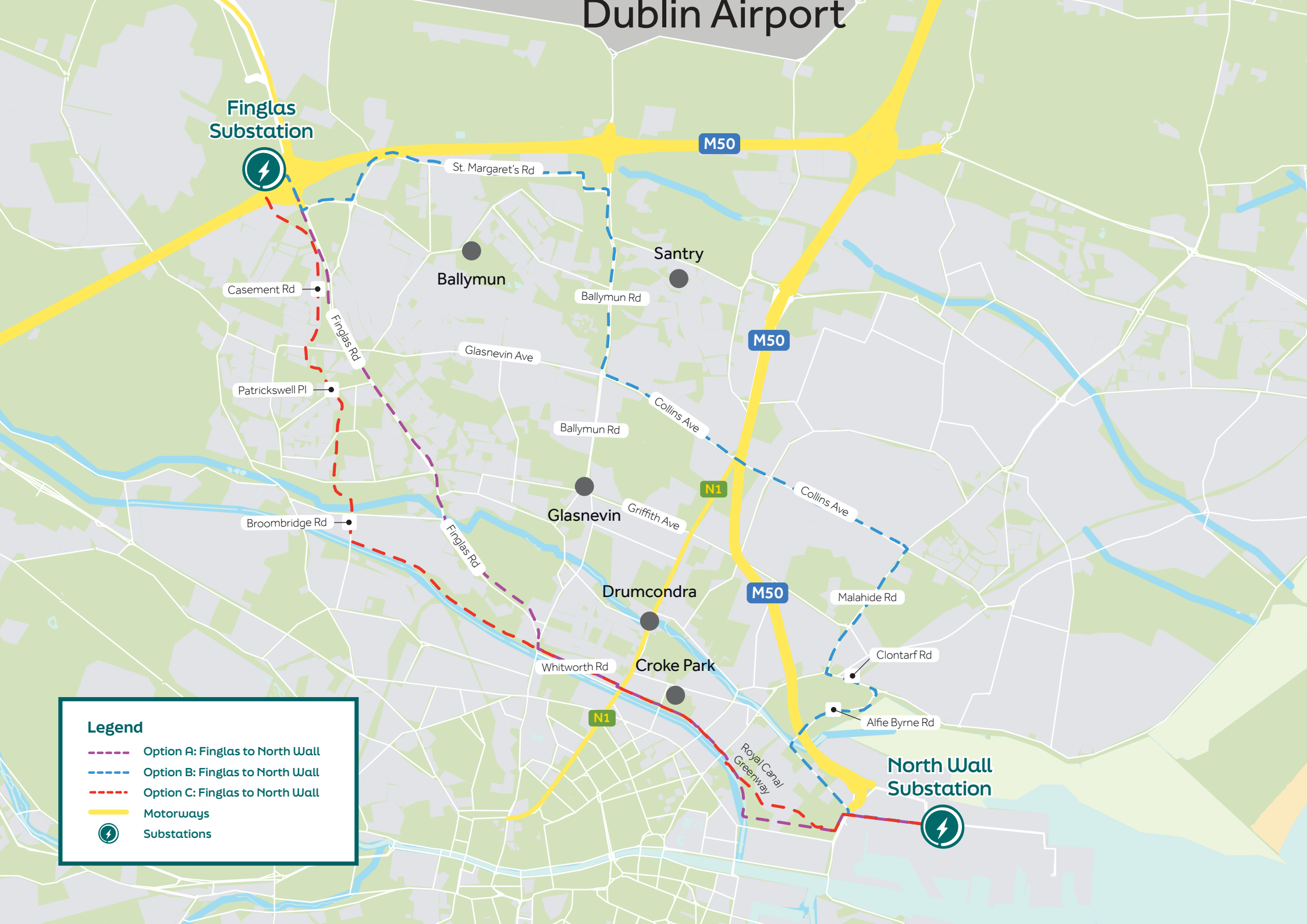
Aviva  
Stadium

**Sandymount**






**Legend**

- Option D: North Wall to Poolbeg
- Option E: North Wall to Poolbeg
- Option F: North Wall to Poolbeg
- Motorways
- ⚡ Substations

# Dublin Airport



## Legend

-  Option A: Finglas to North Wall
-  Option B: Finglas to North Wall
-  Option C: Finglas to North Wall
-  Motorways
-  Substations