

Appendix 1

Summary of Observations

Approximately 900 submissions/observations have been submitted in respect of the application for approval from both individuals, community groups and elected representatives. A list of all observers by County is set out below in Part 1 of this Appendix.

It is evident from the submission made that there is considerable overlap in terms of the issues raised. In order to avoid undue repetition, the issues are summarised below under individual topics for the information of the Board (Part 2 of this Appendix). Where site specific issues arise regarding individual land parcels, properties etc. these are documented as appropriate.

Part 1

List of Observers

County Monaghan

1. Ciara & Alan Tarrant
2. Anthony Mc Nally
3. Dominic Mc Dermott & Others
4. Mary Keenan & Others
5. Patrick Keenan & Others
6. Brendan & Eileen McDonald & Others
7. Felix Mc Kenna & Others
8. Patrick Callan & Patrick G Callan
9. Siobhan & Ciaran Mc Elroy & Others
10. Thomas Marron & Others
11. Seamus Casey & Others
12. Gene Finnegan & Others
13. Frank Ward & Others
14. Brian O'Connor & Others
15. Paddy Duffy
16. Ann Morgan & Others
17. Syl Mulligan
18. Bernie Ruth
19. Noel Campbell & Barry Nugent
20. Ryan Mc Cabe & Others
21. Brendan Carragher & Others
22. Kevin & Margaret Mc Caffrey
23. Noel Morgan & Others
24. Martin & Tess Mc Mahon
25. Gerard Geoghan & Pdraig Martin
26. Martin Mc Cahey and Patrick Keenan
27. Shane Mc Cabe & Others
28. Michael Fox and Patrick Mc Nally
29. Gerry & Agnes Duffy & Others

30. Ciaran Walshe & Caroline Walsh
31. James Rush & Pat Rush
32. Michael Ward & Others
33. Michael Brennan & Others
34. Edward Mulligan & Thomas Mulligan
35. Frances Ward & Others
36. Paul Anderson & Fiona Anderson
37. Michael Murtagh & John Murtagh
38. Kevin Woods & Lynette Woods
39. Philip & Olivia Duffy & Others
40. David Lynch and Louise Lynch
41. Peter Daly
42. Tom Geoghegan
43. Dermot Daly & Jacinta Daly
44. Adrian & Ann Mc Garrell
45. Michele & Sean Finnegan & Others
46. Owen Sullivan & Others
47. John Doran & Others
48. Gary O'Neill & Others
49. Michael & Margaret Mulligan & Others.
50. Pat Keenan & Others
51. John Sheridan
52. Tadhg Daly & Others
53. Jonathan & Siobhan Lewis & Others
54. Francis Marron
55. Steward & Irene Patton & Others
56. Rosaline Markey & Others
57. Andrew Wilson & Others
58. Lorraine & Gavin Duffy & Others
59. Aidan Duffy & Others
60. Sean & Geraldine Martin
61. Barry & Cathy Grimley
62. Paddy Curran & Others

63. Robert Lynch
64. James & Camilla Sheridan
65. Philomena Finnegan & Kevin Sheridan
66. Gerard Garvey
67. Patsy & Analeen Mc Kenna & Others
68. Peadar Marron
69. Plunkett Corrigan
70. Francis Mc Court & Others
71. Fred Punty
72. Pat & Margaret Brennan
73. John Sheridan
74. Martin & Mickey Mc Nally
75. Noel Mc Ginnity & Others
76. Catriona & Gerry Mc Cabe & Others
77. Denis Mc Cabe & Rory Daly
78. Eamonn Kerr & Others
79. Francis Evans
80. Arthur Murray
81. Henry Mc Guigan & Others
82. Ellen Mc Mahon & Rosemary Mc Mahon
83. Brian Renaghan
84. John Mc Quaid
85. Peadar Keelan
86. Katrina Knights
87. Helen Hart
88. Catherine Ward
89. Thomas Sheridan (Corduff-Raferagh IFA)
90. Jim Coyle
91. Peter Geoghegan
92. Michael Mc Ginn
93. Leo Marron
94. Patrick & Ann Irwin
95. Seamus Geoghan

96. Michael Halpin
97. Eugene Connolly
98. Patricia & Coleman Ryan
99. Hugh & Bernadette Duffy
100. Nigel Hillis
101. Declan Keenan
102. Peadar Clinton
103. Eileen Smyth
104. Philip Mc Dermot
105. James Murray
106. Paul & Colette Mc Elroy
107. Dympna Mc Shane
108. Lorcan Mc Shane
109. Paul & Dominic Hannigan
110. Naoise Gordon
111. Anne Mc Ginn and Anthony Moylan
112. P.G Tumelty
113. Mary Hamill
114. James Hannigan
115. Owen & Helen Mc Cabe
116. Kevin Rice
117. Peter Hughes
118. Malachy Smyth
119. Gerard Arkinson
120. Ann Mc Ardle
121. Jimmy Marron
122. Philip & Mark Leatham
123. Brendan Mc Enaney
124. Alan Mc Mahon
125. Huge & Damien Woods
126. Maria Mc Kenna
127. Francie Finnegan
128. Paul Keenan

129. Michael Coleman
130. Margaret Mc Quillan (Principal All Saints NS & Doohamlet Childcare Ltd)
131. Sinead Finnegan (Principal Scoil Bhlaithin Iosa-Ballynagearn NS)
132. Patrick Ward (Chairman Corduff –Raferagh Community Council)
133. Eamonn Donaghy
134. Tom & Elizabeth Byrne
135. Seamus & Katrina Quinn
136. Pat Deery Snr
137. Bridie Harte
138. Trevor & Linda Field
139. Eileen Mc Nally
140. Elizabeth Carragher
141. Harry & Ann Brennan
142. Irene Steenson
143. James Waters
144. Kathleen Hughes
145. John Morgan
146. Angela Keenan
147. John & Margaret Marron
148. Patrick Deeny Jnr
149. Oliver Mc Donnell
150. Kenneth Hamilton
151. Philip Freeman
152. Francis & Patricia Clarke
153. Ciaran Malone
154. Eugene & Patricia Brennan
155. John Mc Guinness
156. Pat & Mary Brannigan
157. Thomas & Irene Ward
158. Philip Malone
159. Brendan Markey
160. Paddy Marron & Patsy Connolly
161. Sean Lynch

162. Gerry Smyth
163. Charles & John Brennan
164. Philip & Anna Collins
165. Margaret O'Neill
166. Kevin Duffy
167. John Hughes
168. Patrick M Hughes & Fiona Hughes
169. Gabriel Mooney & Others
170. Joanne Philips
171. Jim & Geraldine Mc Guirk
172. Teresa Crowe
173. Denis Ward
174. Gabriel Ward
175. Clare & John Reilly
176. Fionnuala Ann Byrne
177. Eamonn & Gladys Mc Ardle
178. Catriona Byrne
179. Briege Byrne
180. Michael Sheridan
181. Peter Ward & Other
182. Jim & Mary Connolly
183. Jacinta Brannigan & Others
184. Gretchen Mone & Tim Evans
185. Gerry & Veronica Mc Nally
186. Robert Harrison
187. Allen Mc Adam
188. Rhona Mc Adam
189. Peadar Connolly (Lough Egish Community Development Ltd)
190. Ann Murray & Others
191. Seamus & Minnie Marron
192. Hugh Finnegan
193. Philip & Bridie Duffy
194. Peter Brennan

195. John Francis Duffy
196. Gerard Nolan
197. Kevin Mc Guigan
198. Declan & Tommy Callan
199. Lorraine & Raymond Byrne
200. Seamus Conlon (Aughnamullen Gym & Fitness Centre)
201. Philip Mc Garrell
202. Francis Mc Mahon
203. P.J. Hand
204. Noel Fox
205. Lorcan Keenan
206. Phil Geoghegan
207. Gerald & Glynis Mc Adam
208. Thomas Mc Enaney
209. Roy Brown
210. Seamus Boylan
211. Joseph Boylan
212. Rose & Enda Duffy
213. Patricia Keenan
214. Patrick Connelly & Others
215. Eugene Shannon
216. Charlie Mulligan
217. Sean Duffy
218. Malachy Smyth & Others
219. Vourneen Mc Bennett & Others
220. Ciaran & Ann Kerr & Others
221. Gene Kerr
222. Mary & Peter Duffy
223. Eugene Bannigan & Others
224. Farrell & Martina Tormey
225. Briege Sheridan (Parents Association St Oliver Plunkett's NS)
226. James Bannigan (Lough Egish Rod and Gun Club)
227. Ann Feahy

228. Barry & Mary Duffy
229. John Kane and Sarah Kane
230. Nigel Donaldson
231. Gerry Mc Elroy and Martin Mc Elroy
232. Brian Burgess & Cecil Burgess
233. Maria Fitzpatrick & Philip Fitzpatrick
234. Des Marron
235. Paul Russell
236. Brian Rushe
237. Sean Tomany
238. Noel & Martin Mc Garrell
239. Pdraig Agnew
240. Charlie Hegan
241. Martin Traynor & Others
242. Dan Curley (Co Monaghan Regional Game Council)
243. Maurice & Joanne Mc Adam
244. Martin & Bridie Traynor
245. Co. Monaghan Anti-Pylon Committee
246. Philip Morgan & Others
247. James & Mary Mc Nally
248. Cllr's Seamus Coyle, Robbie Gallagher, Pdraig Mc Nally and P.J O' Hanlon
249. Jimmy Rice
250. Robert Malone
251. Thomas Mc Dermott
252. Nigel Hillis
253. Sinead Flanagan & Others
254. Jim & Kathleen Kelly & Others
255. Dolores Maguire & Others
256. Donal Mc Mahon & Others
257. Declan Mc Mahon
258. Barry Duffy
259. Cllr Hugh Mc Elvanny
260. Paddy Mac Donald (Chairman Bailieboro Shamrocks GAA Club)

261. Patrick Martin – Withdrawn
262. John & Patrick Martin
263. Edgar Eakins
264. Des Ward
265. Paula Coleman (Doohamlet District Community Development Association)
266. Michaela Kernan & Others
267. Margaret & Maurice Holland & Others
268. Sean & Brigid Ward
269. Philip & Mary Marron
270. Philip & Linda Connolly & Family
271. Peadar Mc Skeane
272. Shane Mc Caughey
273. Patrick & Pauric Marron
274. Christopher Marron
275. Paddy & Pauline Connolly
276. Arlene & Vincent Brennan
277. Matthew Gorman & Others
278. Ciara Marron
279. Majella Boyd (Cremartin Shamrocks GAA Club)
280. Donal Mac an Fhailigh & Aisling Nic an Fhailigh
281. Mining Heritage Trust of Ireland

County Cavan

282. Cormac Mac Mahon
283. Pat & David Cooney
284. Patrick & Annie Lynch
285. Aaron Halpin & Others
286. Patrick Tierney & Others
287. Conor Mc Mahon
288. Nuala Mc Daniel
289. Arlene Mc Mahon
290. Rosemarie Conlan & Others

291. Oliver & Aine Gogarty
292. Tommy Gargan
293. Agnes Gargan & Others
294. Michael & Sheila Tully
295. Noel Kellett & Others
296. James Mc Mahon & Others
297. George Howell & Others
298. Malcolm & Audrey Frazer & Others
299. Billy & Arlette Howell
300. James Mc Mahon & Others
301. Eugene O Reilly
302. Marie Murray
303. Sean Tierney & Others
304. Gerard White
305. Peter Clarke
306. Paul Reilly
307. Brendan & Alacoque Mc Mahon
308. Teresa Fleming
309. Patrick Tinnelly
310. Damien & John Mc Entee
311. Rebecca Shekelton & Others
312. Philip Smith
313. Martin Smith & Family
314. Eugene, Mary & Shane Lambe
315. Patsy Smith & Others
316. Lorcan Mc Cabe
317. John Cambell & Mary T Cambell
318. John Smith
319. Margaret Smith
320. Eugene & Rosemary Cunningham
321. Laurence Keenan
322. Declan Cundelan.
323. Conor Sheridan

324. Eugene Lambe (Kingscourt IFA Branch)
325. Sharon Sheenan (Gym An Ri Kingscourt)
326. Brendan Gargan (Kingscourt Handball & Racquetball Club)
327. Philip Smith (Kingscourt Stars GAA Cub)
328. Kevin Smyth (Lough an Leagh & Muff Heritage Trust Ltd)
329. Lorcan Mc Cabe (ICMSA)
330. Michael Farrelly & Others
331. Andrew Clarke & Others
332. Val Martin
333. European Platform Against Windfarms (EPAW)
334. Brendan Smith T.D.
335. Damien Mc Kenna (Kingscourt)
336. Damien Mc Kenna (Collops)
337. Frank Fitzpatrick
338. Pat Sheehan (Dun a Ri Angling Club)
339. Martin Fitzsimons & Others
340. Bernadette Fitzsimons (Secretary Lough an Leagh I.C.A)
341. Patrick J Mc Cabe
342. Paul Clarke
343. Laragh/ Muff National School Parents' Association
344. Kingscourt Community Centre Sports Club
345. Kingscourt Community Centre
346. Cllr Paddy Mac Donald and Others
347. Cllr Clifford Kelly & Others
348. Kingscourt Stars Ladies GAA Club
349. Daniel Mahon & Others
350. Thomas Carolan
351. Paddy & Nina Carolan
352. Henry Smith
353. Eamonn Mc Dermott
354. 6th Cavan Kingscourt Scout Group
355. St Mary's Brass and Reed Band
356. Anne Farrelly & Others

357. Agnes Muldoon & Others
358. Niamh Mc Mahon
359. Alacoque Mc Mahon & Others
360. Peter O Reilly & Others
361. Ellen Farrelly & Others
362. Liam Mc Cabe (Co Cavan GAA Committee)
363. Paddy & Marie McKeown
364. Eamon & Clare Mulligan
365. Thomas & Bridget Martin
366. Kevin Lynch & Others
367. Alan Reilly
368. Therese Martin & Others
369. John Mc Keon
370. Noel Kiernan
371. Maurice Kiernan & Others
372. Michael Farrelly & Others
373. K.S.A Shields & Co
374. Brendan Mc Kenna & Others
375. Tanya Lay
376. Brendan Farrelly & Others
377. Philip Farrelly
378. Mary Carolan & Others
379. Gay Clarke & Others
380. Peadar O' Maoldun
381. Louise Mc Cormack & Others
382. Michael Jackson
383. Patrick Rodger
384. Kathi Clamor & Eric Brunton
385. Mary Rogers
386. Mark Gilsenan
387. Michael Lennon
388. Eugene Reilly
389. John & Joseph Mc Cabe

390. Laragh 2 National School
391. Joe & Caroline Clark
392. Roisin & Paddy Cassidy
393. Martin & Deborah Boylan & Others
394. Anthony & Fiona Mc Cabe
395. Damien Proudfoot & Others
396. Thomas & Briega Lynch
397. Joe & Helen Tinnelly
398. Kathleen Tinnelly
399. Patrick Tinnelly
400. Philip Tinnelly
401. Derek Mc Kenna
402. Bridie Mc Kenna
403. Julie Shankey
404. Francis O Reilly
405. Sinead & Peter Duffy
406. Ann & Christy Burns
407. Teresa & Michael Carolan
408. Ben Putnam & Eileen Thornton
409. Pat Nulty
410. Joe Farrelly
411. Eamonn Ward
412. Patrick Joseph Hand
413. Tom Reilly
414. John, Mary and Brendan Martin
415. Hughie & Mary Duffy
416. Margaret Muldoon & Others
417. John Farrelly
418. Michele Smith & Others
419. Sean Smith
420. Charles Clarke
421. Finbar McGowan
422. Rocky Mc Kenna & Others

- 423. Reamonn & Liz Martin & Others
- 424. James & Angela Baird
- 425. Kevin & Sharon Shields & Others
- 426. Patrick Power & Others
- 427. Mary Yore & Others
- 428. Denise & Glenn Clarke
- 429. John Gargan & Others
- 430. Mary & John Duffy
- 431. Kate Duffy & Others
- 432. Tommy, Kathleen & Declan McGivney
- 433. Sinead Dow & Others
- 434. Sean, Pauline & Sabrina Clarke
- 435. Carmel Clarke
- 436. Ciaran Smith
- 437. Michael Stafford & Others

County Meath

- 438. Rose Farrelly and others.
- 439. Michael and Tara Gavigan.
- 440. Dermott Ward, Navan IFA.
- 441. Eamonn Meade, IFA Nobber Branch.
- 442. Mark Sheriden, IFA Oristown Branch.
- 443. Brendan Martin, Kilmessen IFA.
- 444. Terence Wignall
- 445. Susan McGee and Family
- 446. Sean and Sylvia Reilly
- 447. Susan Owens and others
- 448. John McConnell
- 449. Christopher Weldon
- 450. Brendan O'Reilly and Rosemary O'Reilly
- 451. Michael Ryan
- 452. Padraig O'Reilly

453. Alison Blake
454. Peggy and Tom Kierney
455. Ron and Róisín Pagan
456. Philip Ledingham
457. Dermot and Jennifer Finnegan
458. Miriam Kane
459. Michael Munnely
460. Colin J. Andrew and Others
461. Philip and Treasa Ward
462. Gerard Cooke
463. Patrick Cooke
464. Roddy O'Connor and Others
465. Cecilia Bell
466. Owen Cassidy
467. Niall Cassidy
468. The Occupiers (34 Edenwood, Kilmainhamwood)
469. Aishling Hand
470. Carmel Plunkett
471. Margaret Duffy, Brigid Duffy O'Reilly and others
472. Fr. John Cooney/Ursula Shalvey, Kilmainhamwood NS.
473. Tina Gilsenan and Others
474. Graham O'Reilly
475. Con Power and Margaret Power
476. James and Imelda O'Dea
477. Declan Mullen and Gerard Mullen
478. Hazel MacEwan
479. Michael Gavigan
480. Shane and Brena Russell
481. Herwig and Patricia Dehaene and Family
482. Dominic Horgan and others
483. Gerald Brady
484. Dr. John H. Ashton
485. Eddie McCormack

486. Oliver Martyn, St. Joseph's NS, Dunderry
487. Trevor and Audrey Morton
488. Donald McKeever
489. Kevin and Judy McAvinchey
490. Joseph H. Glackin
491. Val O'Brien, Dunsany GAA Club.
492. Delma Farrelly
493. Andy Reilly, St. John's Old Cemetery Restoration Group, Nobber
494. Dominic and Lisa Owens and Others
495. Seamus McDermott
496. Teresa Finnegan
497. Pat O'Toole, Trim Athboy and District Angling Association
498. Christopher Reynolds, Ward Union Hunt Club, Dunshaughlin
499. Stephen McGeever
500. Paddy Carroll
501. Andrew Shankey and others
502. Owen Shankey
503. Larry O'Sullivan and others, Bective Angling Club
504. Brendan and Gwen Bagnall
505. Mary Maguire, Kiltale ICA
506. Jean Keogh, Meath Federation ICA Guilds
507. Pat Smith, Dunderry Fair Committee.
508. Geraldine Smyth, Bective ICA Guild
509. Joseph Armstrong
510. Walter A. Rountree, Tierworker IFA Branch
511. Aron McDaniel
512. Enda Murray, Moynalty Cycling Club
513. Willie Darcy
514. A. Lindsay-Flynn
515. Séamus ÓDroma, Scurlogstown Olympiad Co. Ltd
516. Colin Boles, Boles Hire Limited (Churchtown House, Navan)
517. Suzanne Boles, Churchtown Music School (Churchtown House, Navan).

518. Eddie Leonard, Culmullen IFA
519. Lorriane McDonnell, Tara Harriers
520. David Gargan, Castlevilla AFC
521. Eamon O'Fearraigh, Scoil Ultain Naofa and Others
522. Christopher and Catherine O'Reilly
523. Gerard Kerrigan
524. James Howley
525. Joyce Flynn and others
526. Adrienne Skelly
527. Frank and Veronica Martin
528. Ciaran and Maureen Prunty
529. Patrick and Anna Martin.
530. John G. Clavin
531. John Ledingham
532. Conor Ledingham
533. Thomas and Rosarii Smith
534. Ronan Duffy, Residents of Bohermeen and the New Line
535. Philip, Eileen and Thérèse Murtagh
536. Naoimh O'Brien, Bohermeen Toddler Playgroup.
537. Sharon and Kevin Carlon
538. M. Morris, Cormeen Community Development Ltd
539. Philip Smith and others
540. David and Desiree Hughes
541. Anne Davey and Barry Sheridan
542. Joey and Phil Cassidy
543. Noeleen Cassidy
544. Richard Cassidy
545. John Hickey and Mary Tinnelly
546. Francis Cassidy
547. Eoin Russell
548. George Blake
549. Noel Flood and others
550. Fergal McKenna

551. Ciara Russell
552. John Russell
553. Cora Halpenny and others
554. Kelley Cassidy
555. Shane Russell, Kilmainhamwood GAA
556. Christine Stokes
557. Caroline Whelan, St. Ultan's NS
558. Antoinette Brady, St. Ultan's NS
559. Concerned Residents of Bective and others (55 submissions).
560. Concerned Residents of Oristown and others (57 submissions).
561. Concerned Residents of Derrypatrick and others (50 submissions).
562. Concerned Residents of Dunderry and others (43 submissions).
563. Concerned Residents of Summerhill and others (56 submissions).
564. Concerned Residents of Dunderry and Robinstown (64 submissions).
565. Concerned Residents of Martry and others (51 submissions).
566. Concerned Residents of Grange and others (45 submissions).
567. Concerned Residents of Boyerstown and others (51 submissions).
568. Concerned Residents of Drumree and others 119 submissions).
569. Concerned Residents of Culmullen and others (60 submissions).
570. Concerned Residents of Gibbstown and others (74 submissions).
571. Deirdre Courtney (Braccanby Irish Farm LLC, Ardbraccan House).
572. Deirdre Courtney (NV Irish Farm LLC, lands at Bloomsbury, Kells).
573. Desmond Smith.
574. Claire Mulligan.
575. Rose Drum and others.
576. J. Duignan and others
577. Jane and Thomas Fay.
578. Adrian McNally.
579. Mattie Casey.
580. Gillian Callaghan.
581. Mary McCabe.
582. Colm Conaty.
583. Angela, Dar and Cian McCormack.

584. Mary and Martin, McCormack.
585. Oliver Madden.
586. Shauna and Matthew Tiernan.
587. Dan Daly and Family.
588. Marion Garvey.
589. Colm Keys.
590. Maria and Des Keegan.
591. Matthew Ledingham.
592. Dan Daly, Principal Robinstown NS.
593. Mary and John Finnegan
594. Mary and Emily Bray.
595. Sarah and Daniel Elson WITHDRAWN.
596. Paddy Gallagher and Others.
597. G. O'Meara, Bohermeen Community Alert Network.
598. G. Tully.
599. Stephen Carty and Hazel-lee Crothers.
600. Therese Hayden and Others.
601. Sean Heraty.
602. Yvonne Carpenter.
603. Ashling Cahill.
604. David Buchanan.
605. Trevor Buchanan.
606. Declan Carty.
607. Ramona Mulligan.
608. Maria O'Neill.
609. Clodagh Conaty and others.
610. Glenda Maguire and others.
611. Catherine Foley and Sean Mckenna.
612. John Davey.
613. John and Orla Brady.
614. John P. Clancy, Meath Archaeological and Historical Society.
615. Thomas O'Brien and others.
616. Sandra Coffey.

617. Colm and Mary Monaghan.
618. Graham O'Reilly, The Meath Hunt.
619. Paul and Linda Monaghan.
620. Michael and Noelle Finnegan.
621. Thomas Nally.
622. Dennis McCabe.
623. Terence McCabe.
624. Niall Monaghan.
625. Pauric McQuaid
626. Eugene McQuaid.
627. Anne O'Regan and Others.
628. Brian M. and others.
629. Alan McClogh.
630. Dennis Nixon.
631. Mike and Paula Sheridan.
632. Michael Moriarty.
633. Darren and Lisa Moriarty.
634. Helen Moriarty.
635. Seamus Bowman.
636. Mary McCaul and others.
637. Gillian Kennedy.
638. Penelope Morehead.
639. Robert Kenny.
640. John Daly.
641. Nicola Finnegan.
642. Una O'Connor.
643. Peter and Regina Corrigan.
644. Clara Cahil and others.
645. Richard Lynn and Riona Horton.
646. Noel French.
647. Brendan Doyle and Barbara Doyle.
648. Fr. Brendan Madden.
649. Fred Smyth.

650. Noel Meade.
651. Cyril Darcy and Family.
652. Sean Byrne.
653. Peter Timmons, Meath Farm Machinery.
654. John and Robert Russell
655. Marie Hughes, Athboy IFA
656. John O'Reilly and others
657. Larry and Bernadette Geoghegan
658. Kevin and Una Conaty, Conaty's Steel
659. Robinstown Parent and Toddler Group
660. Luc Hemeryck
661. David Hannon & Catherine Hannon, Tí Na Rí Farm Ltd.
662. Michael and Owen Maguire.
663. Patrick McElroy.
664. Oliver Gilsenan and Family.
665. Gerry Martin and Catherine Martin.
666. Francis Lynch.
667. Oliver Howley.
668. John Keely.
669. Simon Lennon and others.
670. Charles Keogh.
671. Cyril Darcy and others.
672. John Joe McGourty.
673. Damien McGovern.
674. Kiltale Hurling Club.
675. Rathcoinnig CLG/Rathkenny GFC.
676. Parents Association of Kiltale NS.
677. Brendan Martin.
678. Francis Stafford Quinn.
679. John and Irene Byrne.
680. Rory Flaherty.
681. Caitróna Flaherty.
682. David Whisley.

683. Bernadette Walsh.
684. Enda O'Toole and others.
685. M. and B. Devine.
686. M. Duffy, Oaktree Charitable Trust.
687. The Greene family.
688. Paul Rogers and others.
689. Damien Dixon, Kiltale and District Gun Club.
690. Fiona Casey, Robinstown Parents Association.
691. Ivan Mckay and others.
692. Mary Monaghan.
693. Martin and Susan Finnegan.
694. Rosemary Fizherbert.
695. Noeleen, Patrick and Anne Foley.
696. Christopher and Annie Meehan.
697. John O'Reilly and others.
698. George Gilbride and Others.
699. Thomas Weldon.
700. Charlie Keena and others.
701. Trevor Madden.
702. Gordon and Gemma Madden.
703. Tom and Kay Madden.
704. David Smyth and Others, Crockets Bar & Lounge, Bective.
705. John and Sinead Bennett.
706. Naomh Ultain CLG.
707. Joseph and Paul English.
708. Tony Casserley.
709. Terence Bennett and others.
710. Joseph M Hannon.
711. James Langrishe and others.
712. Cathal Ó Bric, St. Joseph's National School, Boyerstown.
713. Parent's Council (St. Joseph's National School, Boyerstown).
714. Anna Horgan Keely, Scoil Naisiúnta Naomh Seosamh
715. Lauren Bagnall.

716. Damien and Gemma Quinn.
717. Peter Kay.
718. Ann Finnegan.
719. Hugh Finegan.
720. Gerard and Janie Brady and Family.
721. Alan Finnegan and others.
722. Michael and Doreen Newman.
723. Oliver Daly.
724. William and Sheila Carty.
725. Natalie O'Meara,
726. Emma Gilroy and Eric Cahill.
727. Tom Heffernan, Castletown and Nobber Gun Club.
728. Michael and Patrick Lally.
729. Shane Kellett, Nobber Trout Angling Club.
730. Francis and Diarmuid Lally and others.
731. Frank O'Sullivan, Patrick Farrelly and Partners, Veterinary Surgeons.
732. Patrick and Marion Farrelly and others.
733. Annette and Michael Farrelly and others.
734. Anne Farrelly, KC Childcare Ltd.
735. Martin Rogers, Navan Windscreen Centre.
736. Anne Callaghan, Callaghan Aluminium Ltd.
737. John and Marie Mullyaert
738. John R Cooke.
739. Barry Quirke.
740. Emma Mangan and others.
741. David Gorman.
742. Rosemarie Meegan and others.
743. P. Galligan and others.
744. Tommy Conroy.
745. Bill Byrne.
746. David and Catherine Hannon and family.
747. Michael Byrne.
748. Ronan Collins and others.

749. Kilbeg IFA Branch.
750. Trim IFA Branch.
751. Yvonne English.
752. Padraig Cassidy and others.
753. Brendan Duffy and others.
754. Thomas McDowell and others.
755. Aidan Finnegan.
756. Caroline McSherry and others.
757. Eileen and Maura Sheehy.
758. Bartholomew O'Connor – seems as if some pages are missing?
759. John and Yvonne O'Sullivan.
760. Eugene Jackson.
761. Paul Cassidy and others.
762. Seamus Cassidy.
763. Paul Owens.
764. Michael Callaghan and others.
765. Christopher and Anne Meehan.
766. Concerned GAA clubs of Co. Meath (Bhulf Tón CLG, Naomh Micheál CLG, Moynalvey GFC, Kilmessan Camogie Club).
767. Andrew Treacy, Brunswick Stud Farm.
768. Aimee Treacy, Brunswick Stud Farm.
769. Oratzio Forte.
770. Dunderry GAA Club.
771. John Madden and Sarah Doyle.
772. Nigel Smith.
773. Thomas and Martina Loughran.
774. Clady Vintage Club.
775. Henry O'Callaghan, Dunderry Set Dancing & Cultural Club.
776. Jim Harrington.
777. Paul Ryan and others.
778. Meath IFA
779. Seamus Owens.
780. Robert and Regina Mulligan.

781. Shane and Maria Weldon.
782. Rupert Holohan.
783. Robert McCabe, Agricultural Contractor.
784. Dunderry Gun Club.
785. Ryan Callaghan.
786. Brian Casey.
787. Peadar Callaghan.
788. Maureen Callaghan.
789. Gerard Daniel.
790. Raymond Rennicks and others.
791. Ann Coffey.
792. Joseph Kennedy.
793. John Kennedy.
794. Margaret and David Hickey.
795. John Ryan
796. Gerard Cooke, Dunderry District Community Alert Group.
797. Mary Cassidy.
798. Patrick Smyth, Robinstown Community Group.
799. Thomas Brady.
800. Grainne and Cara Conaty.
801. Beverley and Morten Kristian.
802. Joseph S
803. Anthony Sheridan and others.
804. Frances Doolan.
805. Noel Burke.
806. John Mulroy.
807. Niall O’Riordan.
808. J.MacNaughton.
809. Fergus Lawless.
810. Dara Reilly.
811. E. A. Leonard.
812. Linda Smyth.
813. Sean Keagan.

- 814. Larry McEntee.
- 815. Nancy Horan and others.
- 816. Michael Horan and others.
- 817. Michael and Teresa Buchanan.
- 818. David and Amanda Geraghty.
- 819. Noeleen Kavanagh.
- 820. Catherine Slattery and Carol Duffy.
- 821. Helen and Patrick Duffy.
- 822. Deirdre and Matthew Duffy.
- 823. John Burns.
- 824. Bartle and Renee Clarke.
- 825. Mary and James Morgan.
- 826. Tom McGuinness.
- 827. John and Margaret Olwell.
- 828. Ann McDowell.
- 829. John and Ann Hand.
- 830. Michael Vaughan and others.
- 831. Anthony and Monica Munnelly.
- 832. Frank Brady.
- 833. Martin McCormack, Kiltale IFA.
- 834. Maria Briely, Cortown IFA.
- 835. Tony Sutton, Ashbourne
- 836. North East Pylon Pressure Campaign Ltd, Navan (NEPPC).
- 837. U. O. Gairbhi
- 838. Máire Nic an tSighigh
- 839. Siobhán Seoighe
- 840. Cathal Seoighe

From Outside County Monaghan, County Cavan and County Meath.

- 841. Susan Dennehy McNally, New York.
- 842. Bernie Collins and others, Rathfarnham, Co. Dublin.
- 843. Ruby Walsh, Naas, Co. Kildare.

844. Ted Walsh, Naas, Co. Kildare.
845. Goffs Bloodstock Sales Ltd, Kill, Co. Kildare.
846. Neil Finnegan, Stepside, Co. Dublin.
847. Shane O'Dwyer, Irish Thoroughbred Breeders' Association, Kill, Co. Kildare.
848. Martin Kearney, Kilbride Anglers Club, Glasnevin, Dublin.
849. Michael Grassick, Irish Racehorse Trainers Association, Kildare, Co. Kildare.
850. Peter Sweetman, Dublin.
851. David Bernie, Dublin.
852. Martin and Cepta Hoste, Dublin.
853. Gerard Kemje, Boyne Valley Farmers Co-op Society Ltd, Drogheda, Co. Louth.
854. Carmel McCormack, Cahir, Tipperary.
855. Catherine Lucy Gahan and others, (members of Co. Wexford Energy Action Group representing over 20,000 people directly affected by the GridLink projects), New Ross, Wexford.
856. Thomas Freeman, Land and Utility Compensation Consultants Ltd, Naas, Co. Kildare.
857. Jimmy Finnegan, Co. Clare.
858. Clare Boyle, Carlow Opposing Pylons for You, Co. Carlow.
859. Maura Leigh and others, Gridlink Action Group, Co. Kildare.
860. Residents of County Wexford and County Wicklow, Co. Wexford.
861. Kenneth Matthews, Irish Wind Energy Association, Co. Kildare.
862. Sacha Maxwell, Suir Valley Environmental Group, Co. Tipperary.
863. Chambers Ireland, Dublin.
864. Gary Ryan, Energia, Dublin.
865. John Comer, Irish Creamery Milk Suppliers Association, Limerick.
866. David Malone, Environmental Action Alliance – Ireland, Co. Offaly.
867. Owen Wilson, Electricity Association of Ireland, Dublin.
868. Philip Michael, Irish Doctors' Environmental Association.
869. Pat Murray, IFA Wexford.

Northern Ireland.

870. Ann McGregor, Northern Ireland Chamber of Commerce and Industry,
Belfast.

871. Meabh Cormacain, Northern Ireland Renewables Industry Group,
Belfast.

Part 2

SUMMARY OF OBSERVATIONS MADE

Summary of Issues Raised regarding Need

- The absolute need for a development of this scale and in particular a 400 kV HVAC overhead line should be established before further consideration is given to this project.
- A project which will impact on people and communities should not be carried out unless it is shown conclusively that it is absolutely needed for the good of the country.
- The need for the project is not properly established. The development is based on flawed energy policy. Development should await comprehensive review of State energy policy.
- EirGrid deliberately failed to consider whether the project is required at all, and if it is required, they failed to consider an alternative route. Re-enforcing the existing grid will produce the same benefits.
- The reality is that the predictions for electricity use and fuel prices from 2008 were wrong. This project was conceived on those assumptions, which have not materialised.
- The power line is passing through Co Monaghan and is of no benefit to the community. It is to supply power to N. Ireland who has not bothered to make provision for security of supply or improve power plants in their own jurisdiction.
- The hardship being imposed on people is unnecessary as the bulk of the power generated will be sold for profit to the UK and continental Europe.
- If Northern Ireland has a shortfall of electricity why can this not be addressed by the installation of local more efficient fossil fuel plant and wind energy? Was the alternative of upgrading the existing generators in Northern Ireland to cut emissions from them not considered? One gas generating plant constructed to modern standards would do the same job at a fraction of the cost and with minimal impact on the environment.

- It appears that the citizens of this jurisdiction are being asked to sanction a line to bolster a failed electricity service in Northern Ireland and so that the cost of electricity to Northern customers is reduced.
- There is currently an enthusiasm for an EU wide super-grid, wind energy and other green initiatives, none of which have been assessed.
- One of the rationales for the development is to facilitate the connection of further wind energy to the grid. The ESB acknowledges that wind energy does make a contribution to the national grid in low amounts. EirGrid's capacity factors for Irish windfarms are overstated and accordingly the Board is required to obtain the services of technical experts to assess EirGrid's claims.
- Unfair that the development is not being subjected to the same governmental review process that has been imposed on other EirGrid projects.
- The existing interconnector is double circuit and is capable of carrying 1200 MW of power which is the total daily average consumed in N. Ireland. The interconnector is only used at one sixth of its capacity.
- Ireland already has a very large and very costly surplus of generating capacity. Peak demand is under 5000 MW. There is no need for a large margin over this figure. There is already spare capacity yet electricity prices are about 30%-40% above the European average. There has never been an independent cost benefit analysis of the project.
- In 2010 the substation in Kingscourt was an absolute linchpin for the entire project, why is there no longer a need for it.
- If the interconnector is really needed, then the cost should be borne by all of the people of Ireland to place the cable underground.
- Why should people of Monaghan, Cavan and Meath pay an unacceptable social and economic price for supplying power to the rest of Ireland.
- No evidence produced to suggest that the project is necessary, that the existing line is under pressure. No outages attributed to the shortcomings of the line. The proposal will result in 670kV capacity, where 270 kV currently suffices. Do we need 150% increase in capacity?
- The perceived need for this project, locally and nationally have changed significantly (as per EirGrid's own literature). The need for the project independently of the previous application must be demonstrated.

- Due to economic collapse and other factors such as better insulation the peak demand in 2025 is now forecast at 5,100 MW, exactly the same as it was in 2008. While it is accepted that there is still a need for the project, that need is reduced and the scale of the project must be questioned.
- Both Grid West and Grid Link were originally proposed as 400 kV overhead lines with the same power transfer capacity (1500 MW), the same as the proposed interconnector. Grid West can now be downsized to a 200kV line at 500 MW and the existing 400kV lines from Moneypoint can be reconfigured to take an increased power load by way of series compensation, obviating the need for a new 400 kV line at all. This makes the need for a 400kV line in the north-east even more perplexing, especially when there is an existing double circuit 275 kV line that is not operating at anything like its full capacity, which is understood to be 1200 MW (600 MW on each circuit) upgradeable to 1500 MW (750 MW) on each circuit).
- Evidence was given at the previous oral hearing that the maximum power transfer for safety reasons by way of system collapse is 450MW. The figure is repeated in the Consolidated ES but the records on the SONI website show that it is not operated anything near 450 MW and the norm is under 100 MW. Are EirGrid /SONI operating the existing interconnector at below their own safety capacity as yet another reason to support the need for the second interconnector?
- There is an existing interconnector theoretically rated at 1500 MW in place and while reinforcement may be needed there is no evidence in the EIS that double the capacity is required. The EIS fails to explain why the second interconnector needs to have a total power transfer capacity of 1500 MW.
- It is the opinion of CMAPC that the true need for the second interconnector is to meet the needs of N Ireland, who will have security of supply issues after 2016. Other factors (such as difficulty in obtaining planning, public resistance etc.) and not the absence of a second interconnect will be the limiting factors on wind penetration in the electricity market.
- Whilst it is argued that the proposal will reduce electricity costs, savings to customers are dubious at best. Where savings do occur, it is a saving to the wholesale market and not a direct saving that must be passed back to

customers. There was little or no evidence of this when there was a marked reduction in gas and oil prices.

- At the previous oral hearing, EirGrid gave evidence that the electricity supply in the North-east would become unreliable in 2012. The provision of a new substation in Kingscourt was required. The line from Woodlands to Kingscourt was required to reinforce the north-east and the line from Kingscourt to Turleenan as the new interconnector. The new substation is not part of the current application and accordingly reinforcement of the north-east cannot be cited as a need for the project.
- The overriding need is to get power into N. Ireland to address their security supply issues. Other benefits are secondary in nature and cannot be accurately quantified. There are no plans for any connection to the line either to reinforce the north-east or to cater for any major development along the route requiring a large amount of electricity.
- The security of supply issues in the north can be addressed by an underground solution.
- Unclear why 1500 MW is now required when the National Development Plan 2007-2013 in the middle of the economic boom noted that the north-south interconnector would double the transfer capacity to over 600MW.
- The interconnector if built will result in distortions to official figures on carbon emissions as the consuming country does not have to record the carbon impact of electricity imports. Carbon emissions and carbon financial penalties accrue to the country where they are produced. This could lead to a situation where the Irish consumer pays for emissions used by Northern consumers.
- Impact on competitiveness. Experience has shown that renewable energy does not bring down the cost of electricity. Denmark has the highest amount of installed wind energy and the highest electricity prices, Germany comes second and with the second highest prices. The cost of one unit of wind energy is higher than the cost of electricity.
- Development is unsustainable. Failing to meet the need of the present without compromising future generations.

- NEPPC challenges the assumptions, methodology, analysis and recommendations related to the conclusions arrived at by EirGrid in forming a justification for this project (Grid 25).
- The project is not proposed to address an immediate or recognised strategic or national electricity demand shortfall nor is it necessary or justified on the grounds of overriding public interest.
- It is clearly based on significant commercial interests e.g. to accommodate significant increases in production of wind energy. However, this project was clearly planned prior to the formulation of government policy documents on renewable energy.
- Whilst have made great play of inviting the public to review the Grid 25 strategy, of which the North-South Interconnector project (NSIP) is a key component, an email exchange between EirGrid and NEPPC did not allow any inputs into the NSIP (Appendix 1).
- Failure to assess the justification of the project in terms of security of supply.
- In the absence of any demand for increased electricity supply in the State, the consideration of the project must demonstrate compliance with the provisions of the development plans for the area. There are no grounds upon which to materially contravene the development plan as the detailed nature of the project (provision of overhead lines in lieu of alternative means of transfer of electricity) are not of strategic or national interest.
- Since interconnection has been established in the 1970's there has been no justification for fears (system separation).

Summary of Issues Raised regarding Legal/Procedural Matters

- Non-compliance of the project and planning application with the UNECE Espoo Convention on Environmental Impact Assessment in a Transboundary Context.
- Failure to comply with Article 6(4) of the Aarhus Convention and Article 6(4) of the Environmental Impact Assessment Directive i.e. *when all options are open and effective public participation can take place.*
- Failure to address the cumulative impacts with other projects, which should have been incorporated into compliance with Article 7 of the Aarhus Convention and the SEA Directive.
- Failure to assess the justification of the project in terms of ‘security of supply’ and in terms of cost/benefits.
- Failures in relation to environmental assessment and associated public participation.
- The statutory process for the proposed development is flawed owing to deficiencies at SEA level. SEA was not carried out on the EU directive for renewable energy 2009/28 /EU, on the National Renewable Energy Action Plan (NREAP), or on Grid 25. Granting this application will only serve to legitimise the legal failings of the Government and EirGrid.
- The idea behind the SEA Directive is to ensure that all parts of a plan/programme is assessed. The entire NREAP should have been subject to SEA before an application like this is made. EirGrid have separated out the North-South Interconnector and should planning permission be granted this, it will be followed by other applications, which defeats the whole purpose of the Directive. SEA must show that the development is needed in the first place. Assessing only where it is to be built is not sufficient.
- The Principle of Proportionality is a key aspect of European Law, which requires that the benefit to society from the plan must outweigh the damage likely to be caused. It is believed that the present infrastructure is adequate and that the project is an optional extra.
- Whilst the applicant’s Strategic Environmental Statement (SES) makes it clear that the proposal is expected to improve security of supply of electricity on the

island of Ireland, the analysis demonstrates that this is not the case. Another rationale for the proposal is to provide infrastructure for wind farms. No assessment on wind energy was ever conducted in the EU or Ireland. The NREA is also cited as a reasons to justify the development. The NREAP was never assessed.

- This is just one part of the plans/programmes resulting from the EU renewable energy directive and for Ireland's National Renewable Energy Action Plan. This plan should have been assessed technically, and environmentally with a proper cost-benefit analysis carried out. The NREAP has been allowed to grow independent of the controls that should have kept it in check. The Board is not bound by the policy of the government. It is bound to support sustainable development and this development is not sustainable.
- There is a failure to comply with all the safeguards in place to ensure that the precautionary principle is followed. The legal framework is in place to ensure projects with the potential to be environmentally damaging are properly assessed. There are rules and international agreements for best practice in environmental planning. The majority of these are not just guidelines and are legally binding. They are ignored and as a result EirGrid intend to force their project into the community.
- The EIS prepared for the application is legally defective as it has not been prepared in accordance with EU Directive 2011/92/EC.
- There is a requirement for the Board to have or hire the skill needed to assess the EIS under every heading. This includes, medical, technical, property values and environmental impacts. Should the Board not possess these competencies, it must find the expertise. It is not believed that the Board has these competencies and is relying on the vested interests of the developer. An Bord Pleanála must demonstrate the existence of a structural separation in the assessment process.
- Should the Board grant the application, the focus will be on a judicial review and a possible appeal to the European Court of Justice. Grid 25 was done after the decision to install the cabling was made and does not assess the wind energy or transport components. It splits the project up into its

component parts resulting in project splitting, which is likely to form a central pillar of a judicial review in the event of permission being granted.

Adequacy of EIS

- Insufficient information presented upon which an informed decision can be made in regard to likely significant effects.
- The EIS contains inadequate and substandard information particularly with regard to baseline information requiring actual physical surveys of the work sites over appropriate periods.
- EIS cannot be carried out from adjoining roads and aerial photography. Some of the roads would be 0.5 miles away from the proposed line and there would be no line of sight in a lot of cases.
- In comparison ground surveys were repeatedly undertaken from 2005-2013 in N. Ireland and the vast majority of the sites were also surveyed in detail.
- Refusal of access to land over the vast majority of the line route in the ROI must seriously affect the findings with regard to the EIS and render it an unreliable document on which to carry out EIA.
- Large number of discrepancies with regard to accuracy of work carried out by EirGrid.
- Comprehensive site investigations for all of the tower base locations was not carried out along the route alignment.
- Photographic imagery does not provide a three dimensional view of property on the ground.
- Lack of information on soils, drainage and waterways and the impacts of traffic on these systems.
- The EIS is incomplete in terms of bat surveys and consideration of Whooper Swan. Inadequate detail is provided on how water sources will be protected from potential sources of pollution to protect wildlife, habitats and tourism interests.
- EIS inadequate and assessment by EirGrid limited to desktop study.
- EirGrid commit to undertake pre-construction otter surveys in order to confirm the conclusions set out in the EIS. Surveys will be carried out retrospectively,

when nothing can be done to the alignment. The EIS is technically incomplete.

- No consideration in the EIS of the location of pylons with regard to private wells or the long term construction impacts on the underlying springs which support these wells.
- There are three different measurements in the EIS between Tassan Lough and the alignment ranging from 250-310m.
- The omission of the 'Kabin' and the poultry house in Lisdrumgormly suggest that the developer is using outdated maps.
- The EIS and planning application do not provide an impartial observer with concise, objective and sufficient detailed evidence to justify the proposal.
- This a PCI as it is a transboundary application between two jurisdictions. The quality of the application should have been equal in both jurisdictions. The absence of detailed surveys for each individual site in the Republic is a major concern. Access to land is required to determine the distance of dwellings from pylons.
- The consent of the landowner is required to allow EirGrid to access land, which will not be forthcoming given the level of local opposition to the project. This is a legal matter which must be investigated by An Bord Pleanala prior to a decision being made.
- EirGrid failed to access over 80% of the area and sites of the proposed development which means that the information provided on the likely significant effects of the project falls short of that which is legally required.
- The EIS fails to provide the information specified in the Directive. The 'whole project' was not examined and there is a marked absence of baseline material, species distribution and local environmental conditions. Desktop studies, driving past and flying over the affected areas does not constitute an appropriate description of the aspects of the environment likely to be affected. The likely significant effects of the proposed development on over 80% of the proposed land affected by the development cannot be assessed.
- It is submitted that the EIS is unfit for purpose and not adequate for the Board to carry out a full and meaningful assessment of the project.

Other Matters

- The proposal does not satisfactorily address the policies in the Monaghan County Development Plan.
- Conflict of interest in dual role of Board as competent authority for PCIs and statutory body responsible for determination of application for approval.
- Precautionary principle should be applied in considering the application.
- Applicant's assessment is unduly restrictive. There has been a failure to consider all appropriate and necessary planning criteria and to assess the matter properly in accordance with the principles of proper planning and development.
- Development is unlawful and contrary to European Community law. Development will render any reasonable beneficial use of lands impossible, particularly the existing use for equine purposes. These issues must be considered as part of the EIA.
- The applicant's approach in respect of impacts on land and property values renders the entire basis upon which the EIS is based unlawful.
- ESB should have been identified in the application documentation. EirGrid have no powers to construct the development. The omission of ESB from the application documentation is therefore fatal.
- No letter of consent is submitted by landowners. The application therefore contravenes Article 22 of the Planning and Development Regulations and is invalid.
- The applicant does not enjoy the power to enter lands or procure wayleaves.
- EirGrid failed to inform those most directly affected by the development.
- €50 fee is exorbitant.
- Landowners have a right to compensation for loss in value of property/damage caused to lands and to costs of professional advice. No references are made to any compensation assurances or remedies which are normally included in applications for electricity transmission.
- Development will enable and empower the two transmission networks in Ireland and Northern Ireland to operate jointly and more efficiently. The development is a crucial piece of infrastructure and would allow more efficient

use of renewable energy, improve security of supply, increase competition, promote cross border trading and reduce constraints that restrict the operation of the Single Electricity Market.

- Development will facilitate sustainable economic growth, underpin regional development, facilitate interconnectivity and achieve cost efficiencies.
- Development will facilitate significant economic development and provide immediate benefits to customers, promote competition, facilitate a higher level of renewable penetration and enhance security of supply.
- Development is consistent with EU energy policy, national policy and local planning policy. Development is technically robust and cost effective. Delays in provision will incur additional avoidable costs.
- The proposed development is an essential piece of electricity infrastructure required to ensure security of supply in Northern Ireland and to facilitate sustainable development in the context of economic growth and job creation throughout the region.

Summary of Issues Raised regarding Public Consultation

Public Consultation too Late in Project Development

- Public consultation has been held back until irreversible decisions have been taken. Regulators have approved a proposition that the second interconnector should be a 400kV single circuit line running parallel to existing 275 kV double circuit line as far back as 2006, yet no information was made public until October 2007. When the plan was unveiled route corridors were already chosen without any regard for environmental constraints.
- The Gunning principles, Aarhus Convention and the Public Participation Directive require that public participation be meaningful, timely and held before the decision is made. It is unclear how the preferred route option emerged arising from the lack of public consultation.
- Failure to comply with Article 6(4) of the Aarhus Convention and Article 6(4) of the Environmental Impact Assessment Directive i.e. when all options are open and effective public participation can take place. The Judgement in Case C-416/10 of the ECJ was very clear on this matter.
- Consultation after the decision on technology choice and route selection has already been made contravenes the Gunning principle of '*conscientious consideration of fruits of consultation*'.
- EirGrid's actions contravene Article V1.3a of Regulation 347 which requires that the public etc. '*shall be extensively informed and consulted at an early stage, when potential concerns by the public can be taken into account and in an open and transparent manner*'.
- Undergrounding was not considered. OHL was the only option, the route was chosen and then the public were 'consulted'. This approach demolishes any claims of legitimacy for the consultation process.

Inadequate Public Consultation in respect of Strategic Policy Documents

- The National Renewable Energy Action Plans in Ireland and Northern Ireland put forward renewable energy targets. These were not subject to public consultation and therefore failed to comply with Article 7 of the Aarhus Directive and Directive 2001/42/EC on Strategic Environmental Assessment.

- The National Renewable Energy Action Plan (NREAP) has multiple references to Grid25 and was adopted (30th June 2010) prior to public consultation on the Grid25 SEA (20th March 2011).
- Ineffective public engagement for Grid25 SEA. Grid25 well underway before SEA completed.
- The North South Interconnector is a key element of Grid 25. It and associated wind energy development clearly has major trans-boundary environmental effects in Northern Ireland. No public engagement by EirGrid on environmental effects of Grid25 in NI (SEA) or acknowledgement of environmental effects. Environmental effects of NSI acknowledged at project stage.
- The north-south interconnector is fundamentally interlinked with the renewable energy programme on both sides of the border.
- Consultation process for 'Your Grid Your Views Your Tomorrow' was inadequate. Extension of consultation period granted for only two weeks. Consider that this was due to the need to reference the document in the application made to ABP for the proposed development. Extension was still inadequate and therefore the strategy document was still incomplete and should be disregarded. To continue with the proposed development, in the absence of a completed grid development strategy, would not follow international best practice and would be premature in the context of EirGrid's own national strategic plans and the Government's White Paper on Energy.

Inadequate Public and Landowner Consultation:

- Methodology of public consultation
 - The urban model of public consultation did not suit a rural community (methods used isolated, side-lined and intimidated rural dwellers and citizens were treated like 'simple country folk').
 - Lack of respect shown to landowners by EirGrid, who have not communicated directly to explain in detail the nature and extent of the proposed works or sought permission to enter lands.
 - No public notice along public road to inform general public of nature and extent of development etc.

- Consultation process was not easy to engage with and was intimidating.
- Became aware of proposal by word of mouth.
- Information was channelled through the internet where there is little or no broadband penetration, coupled with the fact that many farmers do not have access to a computer.
- The EIS is just one of the many documents and maps presented as part of the planning application which suffers from 'information overload'.
- Information booklets are confusing and don't answer questions.
- EirGrid refused to discuss the project with affected communities, landowners etc. in a public forum. It has refused to meet affected landowners as a group, to hear their fears and to discuss the best way forward. EirGrid have employed a heavy handed approach in an attempt to gain access to land.
- EirGrid has refused to meet with landowners. Landowner consultation is a pretence.
- Consultation meetings cancelled, inadequate consultation since.
- EirGrid decided on the route prior to contacting the most affected group, landowners.
- Inadequate consultation, questions previously tabled remain unanswered.
- Unfettered power given to the organisation has created a culture in which there is no transparency or accountability.
- Communities affected are being discriminated against by EirGrid and the Government. At no time were we consulted or asked for our views on unnecessary eyesores being constructed just metres from home.
- Lack of consultation with the people of Bohermeen.
- Lack of proper, informed consultation by EirGrid to landowners (attach notes of meeting, EirGrid representatives unable to answer many questions posed).
- Inadequate information/availability of information.

- Poor access to links quoted in EIS (take you to the main page of the organisation referred to and not the specifics highlighted in the bibliography).
- EirGrid refused to reveal to the public the rationale for its choice of route corridors and NEPPC was forced to take EirGrid to the High court to obtain this information, which is a fundamental component of public consultation.
- In some cases, maps submitted are not fully accurate, with a number of dwellings missing from various maps.
- Identification of landowners/consultation with landowners:
 - Failure to consult with correct landowner in respect of Pylon 149 and 150.
 - EirGrid failed to inform those most directly affected by the development.
 - In a number of cases it has documented and highlighted landholdings in its planning application, that are now on public display, without the knowledge or consent of the landowner concerned.
- Consultation with regard to alterations to tower locations.
 - Late changes to tower locations. The final application lodged included changes to some tower locations with a failure to properly consult with the landowners and public. At least two landowners, who had never previously been contacted by EirGrid, were informed that there would be pylons on their land just one week before the application was officially lodged. Eleven pylons were relocated, affecting 16 landowners in the period post consultation with no consultation with landowners.
- Consultation with regard to the proposed access routes.
 - No consultation took place with regard to location of access tracks.
 - EirGrid has failed in its function to inform all potentially impacted landowners of its intention to avail of their properties for access purposes.
- Fee.

- €50 fee is exorbitant and prevents many from having their genuine concerns addressed.

Inadequate Response to Issues Raised in Public Consultation Process

- Despite a consultation process between residents and EirGrid that has been ongoing since 2007, no substantive change to the project has been proposed by EirGrid.
- Consultation was a 'take it or leave it scenario' and did not provide for two-way interaction.
- As a direct result of the lack of meaningful consultation, EirGrid has completely underestimated the level and strength of opposition to this project in Co. Monaghan.
- The route was a *fait accompli* before contact was made with the landowners. No opportunity to discuss alternatives.
- Landowner change request forms (re tower locations) were sent to landowners with the proviso that access to lands for survey work was required before any change request forms could be considered.
- EirGrid prejudged from the outset and made a predetermined assumption that irrespective of any available or newly emerging data or commissioned reports, overhead transmission lines were the only option they would pursue.
- Despite the withdrawal of the previous application and its resubmission nothing has changed in terms of EirGrid's refusal to properly consult with the public on the underground alternative.
- The concerns of the local communities need to be considered in greater detail before further consideration is given to this project. The location of each tower should be individually assessed. The line route should not be designed around a blanket minimum distance of 50m from the outer boundary of a residential property, which is in itself an unacceptable distance for a large-scale pylon from a family home.
- Adequate time must be given for consideration and response. EirGrid did not take sufficient time to consider and respond to the major consultation organised by CMAPC in May 2013 as the Preferred Project Solution Report was published just 6 weeks later.

- The public was not given the necessary information regarding the possible undergrounding of the proposed lines.
- 95% of affected landowners oppose the application and support an underground cable. No public acceptance of project.
- People in the community have not been given a chance to be involved in deciding the route or whether lines are above or belowground.
- Scientific evidence and technical evidence has been used to support the preferred options with little evidence of consideration for public opinion or those whose lands/property are directly involved.
- Wishes of the community along the route are being ignored.
- Government is foisting an unpalatable and potentially dangerous development upon the community without regard to the opinions of the citizen.

PCI Process

- The PCI process has allowed EirGrid to correct their mistakes on an on-going basis and submit at least two incarnations of the planning application to An Bord Pleanála before the final one was lodged.
- Public consultation on repositioning of towers in March 2015 was inconsistent with the Concept of Public Participation (CPP). The CPP stated that following all modification requests landowners were informed in writing of the final line design, tower locations and proposed temporary access routes that EirGrid was intending to submit to An Bord Pleanála for approval. An Bord Pleanála were wrong to accept the current application.
- The Board approved EirGrid's Concept for Public Participation without requesting any inputs from prescribed bodies.

Concerns regarding the Impartiality of the Board given its Dual Role

- The proposed development is both a strategic infrastructure project and a project of common interest. The dual role of the Board as statutory planning and consent granting body and Competent Authority for PCI raises challenges at public perception and understanding level.

Other

- Conditions in respect of a previous planning permission granted in respect of Woodland substation were ignored by EirGrid. Concerns regarding other matters related to the consent associated with these works.

Summary of Issues Raised regarding Alternatives

- Overhead lines will never be accepted by local communities. Development should be placed underground along local roads. NEPPC has demonstrated that an underground option is feasible. Other high voltage lines have been placed underground in Europe e.g. 400kV OHL between Aarhus and Aalborg, Denmark, from Euboea, Greece to the mainland.
- Route has not been planned for partial or complete undergrounding and may be unsuitable for same, however EirGrid has not seriously examined an underground route corridor option.
- The applicant has failed to consider alternative corridors, such as the M3, railway lines.
- There has been a failure to consider in a broad reaching and lateral thinking matter appropriate route options, varied in character, alternative means of transmission, alternative types of energy distribution networks, new types of underground cabling and how the existing network could be improved and/or reinforced using new technology and equipment. The development therefore conflicts with the provisions of the EIS Directive.
- The project was first proposed around 2007 and was withdrawn in 2009. No alternative ways of achieving the same result were ever considered.
- Following the withdrawal of the previous application, EirGrid was duty bound to start the route corridor collection process from the beginning. All three routes should have been evaluated from the beginning and consultation should have taken place on each of these routes before any one was chosen. Each option should have been examined openly and transparently and the expected impact on the area assessed using current information, data and consultation to verify route selection.
- The Government set up an independent review of the possibility of underground versus overground options in 2011 and it clearly states that an alternative corridor route should be examined as none of the three existing route corridors were feasible for undergrounding. EirGrid did not carry out a new Route Corridor Selection process and accordingly all alternatives were not duly considered.

- No alternative to building a 400kV interconnector or alternative route was considered.
- A simple and technically feasible solution exists, to install the interconnector along public roads using underground technology. This option eliminates all the objections and concerns that landowners and the public have concerning the overhead lines and pylons. The campaign by NEPPC to have the interconnector placed underground along public roads is a sensible solution and is supported. It is the choice of the people of Co. Monaghan has not been evaluated and considered.
- The cost of undergrounding has radically reduced and is now an even more viable alternative.
- An independent body should be appointed to fully and properly investigate the possibility of undergrounding this project to alleviate the concerns of the people of Co Monaghan and the North East in general. The Independent Expert Panel that investigated Grid West and Grid Link should be requested to review the north-south interconnector project. The exclusion of the North-South Interconnector from independent analysis on the grounds of 'urgency' is unfair and discriminatory.
- Unclear why the existing Louth to Tandragee cannot be upgraded. It is unclear why an additional interconnector is required when there are already large interconnectors in place (Scotland to N. Ireland, Wales to Dublin and east/west interconnector).
- Why have Grid West and Grid Link been downsized? There are proposals to underground these projects so why cannot proposed development be undergrounded.
- The original proposal included a sub-station near Kingscourt to boost power in the north-east. The substation is now longer included in the proposal and the reasons are properly explained.
- The underground would cost a little more but there would be less resistance to it. The potential for short term savings has to be measured against the long term overall implications for the residents affected.
- The CEO of EirGrid, Mr Fintan Slye recently admitted to an Oireachtas Committee that it is technically feasible to engineer an underground solution

for the North-South Interconnector. It is unclear why this option was not therefore pursued by EirGrid. In the case of the Grid Link and Grid West projects numerous alternative detailed options were offered and the most advantageous solution accepted. The underground option was never properly considered by EirGrid nor were any comparative costings between the underground and overground proposals presented for discussion.

- The overground option will provide long term negative health, amenity and financial impacts for residents and landowners in the areas affected.
- It is understood that the main function of this project is to link the Northern and Southern grid systems so that they can be synchronised. EirGrid claim that AC lines cannot be placed easily underground and the use of DC cables will not provide the synchronisation required. This raises the question of how the cables from the EU super-grid and grid connections between Ireland and the UK can be placed under sea. There are numerous technical constraints in putting HVAC cables underground, very similar constraints occur when attempting to put HVAC cables under sea. Therefore, the idea that this project is a 'must first step' for other extensive cables linking Ireland to Britain and Europe is untrue.
- EirGrid have failed to demonstrate that this cross border development is vital for the socio-economic development of the State in accordance with EirGrids terms of reference. It may well be of socio-economic importance to N. Ireland and the concept of increased power transfer between the two jurisdictions is supported. The ROI is awash with power while N. Ireland will be in danger of shortages post 2021. The exchange of power may well be a one-way street and it is unclear how this is vital for the socio-economic benefit of the State.
- The proposal is about getting power into N. Ireland. Unless there are plans to build modern efficient generating plants to replace those that have to close down in N. Ireland, they have nothing to bring to the table that will be of benefit to the socio-economic development of the ROI
- With no plans to build efficient generating plants in N. Ireland, to replace those closing down, downsizing must be a viable alternative to be considered. The downsizing of Grid Link and Grid West enabled undergrounding to be considered as a viable alternative.

- Was consideration given to connecting the two jurisdictions by a subsea cable.
- No attention has been paid to EU monitoring assessment recommendations and directives to take maximum advantage of pre-existing infrastructure such as high speed railways and highways. The North –South interconnector route takes a noticeable diversion in its proposed trajectory through the rural landscape of Co Monaghan with its lack of major infrastructure.
- The best practice European model to find ‘*a fair compromise between new infrastructure needs and environmental concerns, negotiated in a transparent manner, possibly with the help of a facilitator or coordinator*’ has not been applied to EirGrid’s planning of the project.
- The development of infrastructure normally is designed to directly benefit the local, host and wider community. In this case there will be a significant loss to all those directly affected. It would appear that rather than trying to seek a fair compromise between new infrastructure and environmental concerns the decision to choose this route was on the basis of a lower population density which would provide a relatively lower resistance.
- Currently in England the 50m pylons which were built in the 1950’s are being dismantled and removed from special areas of natural beauty with the power lines being placed underground. Why would Ireland now decide to build overground, when it should be future proofing its environment and its infrastructure.
- The argument has been put forward by EirGrid that this plan is the most cost effective model and the cheapest for the consumer. An Bord Pleanála must ensure that investments in infrastructure is not based on ‘the cheapest model equals the best model’, but that the best model is a future proofed way to sustain best future infrastructure as well.
- The existing North-South connector is operating below capacity and a satisfactory explanation on why this cannot be upgraded to avoid the provision of a new line has not been provided.
- Insisting that cost and time are the over-riding factors in placing the infrastructure overground is subjective and short sighted as it is the local community that will pay the price for many years to come.

- Undergrounding along the road corridors would deliver the development in an environmentally and sustainable way and would eliminate all of the objections and concerns.
- The south and west of Ireland have been afforded the opportunity of undergrounding the power lines. People of the north east are treated like second class citizens.
- Many examples where high voltage lines have been successfully undergrounded including a 110kV line in Bantry. Co Cork, Irishtown to Inchicore and Shellybanks to Carrickmines 220 kV lines and Rush to Woodland 400 kV line.
- According to Askon Consulting Group (2008) the costs of overhead and underground lines are almost equal.

Scale of Interconnector

- EirGrid claimed in the original application that a 1500MW interconnector was necessary. This contradicts its own published data on the requirements which states that 750MW is the maximum requirement.
- EirGrids' planning application is based on the claim for a need for a 1500 MW interconnector, despite the fact that two significant shifts in the need for the proposed project have occurred.
- The ESB's submission to the recent DCENR Energy Green Paper highlighted a number of major concerns related to EirGrid's Grid 25 strategy for upgrading the electricity grid infrastructure. The main issues outlined by ESB are i) that the scale of the Grid 25 Plans far exceed that which is actually needed. Grid 25 is founded on a projected 60% in overall electricity demand by 2025, whereas EirGrids own latest projections now declare a mere 5% projected increase and ii) the significant reduction in overall demand results in a reduction in the level of renewable energy required to meet our binding EU targets. Hence there is a need to re-assess the timing and scope for many of the Grid 25 initiatives.
- The original planned substation in Kingscourt in Cavan has been removed from the current application, due to the lack of demand for at least a decade. This also removes the requirement for a converter station at Kingscourt.

- NEPPC has argued consistently that 500-700 MW is more than adequate. This would reduce the technical costs significantly and make the underground option even more compelling.
- It is admitted by EirGrid that existing transfer capacity has a potential maximum total transfer capacity of 1500 MW (or 750 MW per line) on the existing interconnector.
- Despite having the total transfer capacity to transfer 1500 MW (750 MW on each line) the system operators have decided to operate the interconnector at partial load in case of a catastrophic event leading to failure of one of the lines (the N-1 Criteria).
- Considering that historic power transfers have rarely exceeded 750MW and have a modal load of about 375 MW (EirGrid figures) or the claimed total transfer capacity of 450 MW (para 29 of chapter 2) suggests that the extant interconnection is fully N-1 at 750MW, which is the expected maximum total power transfer that EirGrid have modelled between the two jurisdictions. This clearly raises the question as to why there is a need for an additional interconnector.
- The total generating capacity and demand of N. Ireland is in the range of 1400-1500MW, which equates to the total transfer capacity of the existing interconnector. Therefore, expanding interconnection to a nominal 3,000 MW seems vastly in excess of the real need for the foreseeable future. Given the electricity demand is falling, the design capacity at 1500MW transfer capacity is very unlikely to be ever required let alone a transfer capacity of 3000 MW.
- EirGrid has shown prejudice against the option of undergrounding as a feasible technology, despite the fact that the substation has been removed and that VSC-HVDC underground cable technology has progressed considerably since 2007.
- EirGrid refuse to consider the underground option despite that in particular, the Meath-Tyrone report commissioned by the Government highlights quite clearly that an underground option is feasible and reliable (pages 12 and 13 of submission).
- NEPPC has communications from EirGrid as far back as 2007 stating that it would not consider UGC as a technology alternative, despite the fact that the

Meath-Tyrone report commissioned by the Government highlights that an underground option is feasible (see text)

- Extracts from the World Bank Review are also relevant to the North-South Interconnector in terms of the HVDC alternative.
- EirGrid claim that the OHL option is necessary because of the need to link in to wind farms along the line of the route. However, the largest wind farm in North Meath is using underground cable technology and linking in to a local substation.
- EirGrid has failed to examine realistic combined options for achieving the desired capacity and security of supply objectives for the North-South Interconnector such as the use of High Tension Low Sag (HTLS) conductors on existing lines, the use of 'Series Compensation' technology currently being considered for Grid Link or the use of 400kv 500MW underground cable technology along public roads. The combination of 2 or of all 3 of the above would achieve the desired objectives of EirGrid.
- If the existing interconnector was restrung with HTLS conductors the theoretical TTC would increase by approximately 65-100% (estimated 75-80%). This would also have a significant benefit to consumers as the transmission cost benefits would see a reduction of the transmission component of pricing by between 65-85% or an overall reduction per kW of 7.1 to 9.4%.
- In addition to enhanced TTC and substantial cost reductions, other benefits noted by EirGrid include minimal landowner interaction, no planning permission required, minimal land damage, utilising existing assets, optimising power flow along existing corridors, sustainability and environment is protected.
- The overall cost of the project has not been meaningfully estimated as a number of unknowns exists including the costs of further delay, costs of legal actions by property owners for loss of building and land value, additional costs associated with security and long construction delays due to land owner and community opposition.

Failure to conduct appropriate cost-benefit analysis for project

- EirGrid has refused to carry out a specific underground route identification and cost-benefit analysis for the interconnector, despite this being the first major 400kV project in its € 3.2 billion 'Grid 25' strategic infrastructure roll-out. Instead it has relied on quoting theoretical costs from desk top studies and on a fundamentally flawed study, conducted by its partner consultancy firm PB Power. The study was flawed in two key respects i) no objective attempt was made to assess, identify and select a relevant underground route for analysis and ii) the failure to select a representative route rendered the costing analyses to be meaningless.
- The statements and claims by EirGrid on the cost of undergrounding has varied wildly over the last 7 years and these cost claims are based on hypothetical estimates from various reports.
- EirGrid has direct knowledge of the construction costs of OHL. It has recently completed the construction and installation of the underground and underground 256km East-West Interconnector from Wales to Woodland and therefore has direct knowledge of the construction costs for undergrounding, especially HVDC cable system, this is the same system that the Independent Expert Commission report recommended as suitable for the N-S Interconnector.
- The average cost for EirGrids planned overhead lines for Grid West Grid Link and the N-S Interconnector is €2.1m per kilometre. The construction cost for the East-West HVDC underground and undersea cable is €2.2 m per kilometre. Based on EirGrid's own cost figures the construction cost of overhead lines and underground cables is similar.
- These costs refer to construction only. EirGrid has refused to accept or factor in any devaluation of property or land caused by high voltage OHL's, tourism or landscape impacts and health effects.
- It is estimated using international studies criteria that property and land losses can be expected to be in the order to €310m.
- The delays incurred in upgrading the grid also carry a significant cost element, estimated at circa €30m per year. Undergrounding of cabling does not require planning permission and therefore would provide an immediate solution.

- EirGrid also misleadingly state that should the underground HVDC option be required, another converter station would be necessary at the Moyhill substation, incurring costs of between €100-150m. It fails to mention that this substation could be fed from the convertor at Turleenan ruling out the additional cost.
- Potentially huge savings could be made from the joint use of the planned converter station for the E-W project.
- PB Power works very closely with EirGrid (key consultant to the E-W interconnector project and has been used by EirGrid to examine the worst case scenarios for undergrounding the N-S interconnector) and this creates concern on the independence and objectivity of any findings on HVDC underground cabling costs.
- NEPPC submits that the degradation of Ireland's environmental resources for economic gain does not constitute sustainable development.
- Irish citizens are entitled to value in what we are being forced to pay in order to fund public programmes and policies such as mandatorily imposed renewable energy targets and associated infrastructure, which include the proposed North-South Interconnector and associated wind farms.
- The Principle of Proportionality is a key aspect of European Law and has to be incorporated into the justification for decision making. Where there is a more cost effective measure for achieving the objectives legitimately pursued: then this is the option which must be pursued. Cost can be reflected in both financial and environmental terms.
- Under the provisions of Article 13 of the Renewable Energy Directive 2009/28/EC, the reasons and considerations for approval of any renewable infrastructure or associated transmission network, such as the North-South Interconnector must demonstrate transparency and proportionality.
- The EIA process is a procedure in which the impacts both negative and beneficial are weighed up by the competent authority. To complete this exercise information has to be available on cost benefits not only of the proposed project but also reasonable alternatives.

- The EirGrid documentation has failed to assess alternatives to the proposal e.g. no consideration given to for example upgrading existing Kilroot power station in N. Ireland to reduce emissions etc.
- This leads to the question of what is the justification for all the renewable targets and is the legislation, which is associated with so much financial and environmental cost, proportionate? Do the measures which the legislation is seeking to pursue, exceed the limits of what is appropriate with respect to legitimate objectives and what are those objectives in the first place.
- There is an absence of justification for the EU's Renewable Energy Programme in terms of cost benefits. There has been no assessment at plan/programme level of the that will be achieved in terms of saving in greenhouse gas emissions by the substitution of conventional fossil fuel generation by renewable infrastructure. There is no assessment of the amount of environmental damage associated with a tonne of greenhouse gases has not been assessed. Yet these programmes are being forced through with enormous financial and environmental costs.
- The justifications for the EU's 20% renewable energy targets are based on the need to reduce greenhouse gas emissions, promote security of energy supply etc. The N/S interconnector and its failure with regard to security of supply has been addressed in a previous section and the question that remains is does the interconnector form part of a package to reduce greenhouse gases.
- To answer the question, it is necessary to examine the justification for the 20% by 2020 renewable energy programme. If this is an alleged benefit in terms of environmental protection, then one would expect at a minimum a reasonable accurate figure regarding the actual tonnes of greenhouse gases that would be saved by substituting fossil fuel generation by this renewable infrastructure and an assessment of the actual environmental damage associated with a tonne of greenhouse gases.
- Despite the hundreds of billions spent on EU Renewable Energy Programme to date, none of this was ever assessed at the plan or programme level. The EU does not have a figure for what actual damage a tonne of carbon dioxide is doing.

- The environmental damage caused by greenhouse gases are unknown yet the public administration at EU and Member State level persists on forcing these programmes through with enormous financial; and environmental costs, not only without any cost benefit analysis to support them, but also in a manner which is not compliant with the legal framework.
- It is glaringly obvious that the EU has got it wrong. It has jumped on the climate alarmist boat and forced its citizens to spend hundreds of billions on an alleged environmental protection benefit which it never assessed or properly justified.
- The Irish National Renewable Energy Action Plan has no assessment of impacts or any environmental information relating to its justification.
- The All Ireland Grid Study was published in 2008 and it examined a range of energy generation portfolios and the ability of our power system to handle various amounts of electricity from renewable sources, investment required and the climate change and security of supply benefits that would accrue. The 'Energy Policy and Economic Recovery 2010-2015' report by the Irish Academy of Engineering commenting on the All Ireland Grid Study report noted that the renewable energy targets were set in the absence of credible techno-economic studies to investigate the technical and economic barriers to same. It also stated that due to shortcomings identified by the authors it was unsuitable for use as a basis for national policy.
- No other Member State comes remotely close to installing such large quantities of intermittent (non-synchronous) generation on its grid. Power stations would have to run at low loads and high inefficiencies to be able to quickly ramp up and down to balance the highly volatile wind energy input. The glaring question is why are we doing it. Ireland is an island with a small isolated grid, where frequency control and grid stability is always going to be a challenge. Yet targets and programmes are constantly agreed without proper analysis to support them.
- A striking feature which runs through the limited amount of documentation produced by the authorities to support the renewable and climate change programmes is their glaring incompetency. Europe is not short of engineer's

who have delivered major projects in the energy sector and yet none of this competency featured in the limited analysis on behalf of the public authorities.

- There was a political decision to allocate resources to the Grid 25 programme, (which promotes the delivery of north-south interconnector) it was never justified by a cost benefit analysis.
- There was no Strategic Environmental Assessment of Grid 25 and a failure to comply with the legally binding requirements in relation to public participation. There was a failure to quantify the environmental objective of Grid 25 and in particular to quantify the expected greenhouse gas savings and the alternatives to reach them
- The environmental impacts and justifications for doubling the network of high and medium voltage lines to accommodate wind energy should have been analysed cumulatively with the impacts and justifications for the wind farms per se.
- The statement by EirGrid that the transmission system needs to be redesigned to enable the use of the cheapest energy sources doesn't stack up. The Single Electricity Market Operator (SEMO) fixes the spot price based on the last generator in to the pool to provide power for that demand period.
- The transmission and generation system worked perfectly well in the past, as it was originally designed, because it was done on sound techno-economic principles. Decisions should be based on robust techno-economic studies and be flexible enough to react to the situations that arise over time.
- Despite the arguments made by EirGrid, the more energy which comes on the grid, the higher price the consumer pays. Renewables not only obtain priority access to the grid but they are also subsidised under the REFIT scheme.
- The cost of the interconnector is estimated in a presentation to the Oireachtas Committee by the Chief Executive of the Utility Regulator in Northern Ireland at €286m. This does not include the cost of 600 MW of wind energy in N. Ireland to be facilitated by the interconnector, which is in the order of €2m per MW installed capacity. In terms of the cost of the interconnector, there are far better opportunities available to achieve an actual return on the investment. Northern Ireland requires new dispatchable generation capacity to replace what no longer meets EU emissions standards. This capacity could be

installed for less than the cost of the interconnector (the installed cost of Combined Cycle Gas Turbine technology is less than €0.9 million per MW). It is not understood why this alternative was not considered by EirGrid.

Summary of Issues Raised regarding Human Beings - Health

- Health effects of the proposed development, in particular those arising from EMF emissions.
- Increased risk of childhood leukaemia arising from exposure to EMFs above 0.4 microtesla.
- There is concrete evidence that the presence of the electricity infrastructure poses a real and immediate danger to public health, being directly associated with leukaemia for example (International studies show that children living within 50 m of power lines have an increased risk of developing acute leukaemia). Other linked illnesses and conditions include brain and breast cancer, miscarriage and Alzheimer's disease.
- The largest single study of childhood cancer and power lines (Draper 2005) which was published in the British Medical Journal reported an increased risk of leukaemia in children within 600m of high voltage lines. Why then are pylons being placed just 50m of some dwellings along the route. Another cause of concern is that the measurement is taken from the centre of the line and not the cable nearest the dwelling.
- It appears from WHO statements that health consequences in relation to EMF's are neither proven or unproven. Whilst health impacts are a grey area, the precautionary principle should be applied. Lack of confidence in WHO guidelines on EMF exposure levels given their track record on asbestos and smoking.
- In 2002 the International Agency for Research on Cancer classified ELF EMF as possible or class 2B carcinogen. IARC is a branch of the WHO.
- In 2007 the Department of Communications, Marine and Natural Resources published a report entitled Health Effects of Electromagnetic Fields which recommended specific actions that would be useful in assuaging peoples' concerns with regard to EMF's. None of these recommendations were acted upon. This report should be read in full to get a balanced view of its import.
- A review of the report is currently being undertaken by the Department of the Environment. The report is being undertaken by RIVM, the Dutch National Institute for Public Health and the Environment, which is encouraging as the citizens of the Netherlands enjoy the highest protection from exposure to EMF's

in the EU which is understood to be much lower than the 100 micro tesla recommended by the ICNIRP.

- It is understood that this EMF review would feed into new transmission line siting guidelines that may be considered by Government.
- Reduced melatonin is the core biological mechanism or explanation for many, if not the majority, of the documented negative health impacts of EMFs which is one of the body's natural defences against cancer and other diseases.
- It is considered that it is pre-emptive of EirGrid to have lodged the application at this time.
- Proximity of development to houses, schools, farms, etc. Public safety is at risk if the lines are successfully erected.
- Stress from living close to pylon supported power lines.
- Impact of line on depression.
- Complexity of human body and different sensitivities by different people that science may not yet be able to measure.
- EMF emissions on tree/hedgerow growth (stunts growth).
- Impacts on children with autism with a heightened sensory system.
- Impacts on mental health associated with concerns regarding health issues associated with EMF.
- Interference with pacemakers and other medical devices not assessed in EIS.
- Farmers their families and employees will be most at risk as they will have to walk and work under the lines every day.
- A major study confirmed that houses and schools should not be located close to OHL's.
- Concerns regarding health effects arising due to proximity of schools to the proposed development including Muff N.S. (Laragh) Doohamlet School & Childcare Ltd (1100-1500m), Ballynagearn N.S, St Oliver Plunkett's NS, Robinstown N.S. Kilmainhamood N.S. Scoil Ultain Naofa, Baile Ghib, Bohermeen Toddler Playgroup, Scoil Chaitriona Naofa, Oristown, Boyerstown School and Kiltale N.S.
- Proximity to GAA clubhouses, other clubs and community facilities and the exposure of members, players and the community to radiation from pylons.

- The health effects of the development have not been properly assessed. This creates a *lacuna* which cannot properly assessed without an in depth study. The EIS does not provide sufficient information to enable a judgement to be made on population along the line of the route.
- Risks posed to anglers using carbon fibre rods in close proximity to OHL. What are the flash over distances that EirGrid will stand-over from a safety perspective, under varying weather conditions of temperature and relative humidity? Will EirGrid indemnify against injury or loss of life to members.
- Health effects from having to travel under cables to and from work etc.
- Burying the cable reduces the health impacts significantly.
- Damage to power lines due to lightning strikes and risks posed to humans and animals.
- It is understood that it is the law in a number of EU countries that connectors of this capacity must be placed underground. The legislation takes into consideration the damage caused by electromagnetic fields to human and agricultural life and the impact on the environment.
- Refusal by EirGrid to provide public health indemnification in respect of EMF's and associated health effects. Insurance companies will not indemnify landowners against potential health and health& safety issues that may arise in the future.
- Statistical certainty exists that EMF is associated with causing some forms of leukaemia and other disease.
- The literature includes at least four studies showing increased leukaemia risk up to 600 m from powerlines which is beyond the range of the AC fields, although well within range of corona ion emission. The findings could be explained by two possible models: that corona ions attach to particles of air pollution, making them more likely to be retained in the lung when inhaled, and that corona ion disturbance of the natural electric field of the Earth results in melatonin and circadian rhythm disruption.
- The adverse health effects associated with EMF exposure could all potentially be explained by circadian rhythm disruption. Melatonin is an antioxidant and anti-cancer agent which also reduced growth of human myeloid leukaemia cells and whose disruption by light-at-night is associated with increased cancer risk.

Melatonin disruption in humans is really seen in populations exposed to 'real' fields –down to 0.2 uT

- Considering the lifetime of the proposed project is now 80 years and the rapidity with which research is linking EMF's with a wide range of both human and health issues, the precautionary approach should be adopted and the project should not proceed.
- EirGrid's CEO confirmed that EirGrid has insurance in place for claims on health associated with EMF, which negates its claims that no such risk exists. It is not accepted by NEPPC that no health risks exist.
- There is a vast body of research devoted to EMF, which indicates the seriousness and significance of the issue. There is a compelling and substantial body of peer-reviewed scientific publications available to err on the side of caution.
- Many current standards do not protect people from many consistent health effects. The ICNIRP guidelines for public exposure to 50Hz fields is 1000mG and for 60HZ is 8333.3mG. These are set to avoid electric shock.
- Health aspects relate to (a) the spatial association of diseases to power lines and (b) the cellular mechanisms by which metastasis occurs under electrical and magnetic fields.
- In the case of the former there is no doubt whatever that living close to power lines increases the incidence of reported cases of numerous debilitating health issues such as severe lowering of melatonin and circadian rhythm disruption which are believed to lead to various aggressive cancers, miscarriage, leukaemia, birth defects (humans and animals), etc.
- In the case of the latter, the physical mechanism as to how the magnetic and/or electrical fields because cellular metastasis is still in doubt but recent advances have almost certainly now defined this process by 'the Bystander Effect and Genomic Instability'.
- Professor Denis Henshaw one of the world's foremost experts on epidemiological studies of EMF has estimated that the statistical odds of powerlines not being associated with such health issues exceeds one in a million (Appendix 6 & 7, NEPPC).

- EirGrid has not provided a Health Impact Assessment and has failed to measure and include distances to curtilage of properties or relevant measurements of EMF exposure. It has failed to carry out EMF measurements by an independent authority and to document loadings on lines during measurements. It has failed to carry out measurements at a range of relevant distances from the curtilage of properties and to perform measurements in the Woodlands area where the double circuit is planned.
- Compliance for EirGrid stands at 100 microtesla. Other countries take a much more proactive role and have established voluntary compliance levels of 0.4 microtesla, which are 250 more stringent than EirGrid are willing to accept.
- The magnetic field exposure is 1000 times higher than the voluntary level in place in many countries and the figures do not include the increased levels that will emanate from the Woodlands section where the pylons are doubling up to carry 800,000 volts.
- The ICNIRP specifies that in the case of electric field exposure levels should not exceed the Basic Restriction on current density in the body, the guideline is applied in the EU area to areas where the public spends time. The exposure to the OHL is running at c 90% the restriction level in the body.
- For over 7 years, NEPPC have been requesting the implementation of the report from the Expert Group on Health Effects of EMF, which involved leading experts from various countries. It advised the Government that ‘the possibility cannot be excluded that EMF’s cause cancer and as a precautionary measure, future power lines and power installations should be sited away from heavily populated areas to keep exposures to people low.]
- The Expert Report on EMF underlines the alarming policy and regulation vacuum regarding this major health issue. There is no Irish baseline data on exposure to EMF. In the absence of a proper policy and regulatory regime it seems inconceivable that EirGrid would be allowed to press ahead such as that proposed. A number of scientists have recently commented on the need to take notice of the report by the Expert Group as outlined in the Irish Medical Times on May 30th, 2014.
- The latest correspondence from the Department was most unhelpful and not very illuminating (Appendix 8, NEPPC).

- There is a body of evidence which points to a real threat to health being caused by an OHL of 400kV scale. These findings heighten concerns at a public level as does the apparent desire by EirGrid to take the minimum precautions necessary i.e. minimum proximity of 25m from the proposed OHL to existing houses compared to 60m in the UK and 160m in other countries such as Denmark
- Aviation safety concerns. Impacts of power lines on Emergency Aeromedical Service (EAS), a service provided by the Air Corps have not been properly assessed. Wire strikes were a factor in two recent two helicopter accidents.
- The use of helicopters to patrol border areas for security purposes is an important transboundary aviation impacts which also must be considered.
- Disused mines at Tassan, Lemgare, Lisdrumgormal and Annaghlogh –impacts due to mine working subsidence. Safety concerns from landowners regarding subsidence and insufficient information about these events in the public domain.

Summary of Issues Raised regarding Human Beings – Population and Economic

Impact of development on land and property values:

- The impact of the development on property values has received little comment.
- It is a well-known and documented fact that power lines have a statistically negative impact on both lands and property values. The refusal by EirGrid to recognise this fact highlights the company's approach to ignoring the impact of the development on affected landowners. Property prices can be impacted by as much as 30-40%.
- Development will result in major devaluation of land and properties in village and local communities across the North East. In some cases, this would render a house virtually unsalable.
- Devaluation of agricultural land and properties.
- No compensation offered. Elsewhere in Europe (Energinet – Danish TSO) have a policy that all residences falling within 80m of a conductor are automatically bought out at 110% of property value and all properties within 200m are compensated depending on visual impact.
- Erection of pylons and power lines in close proximity to a property will devalue property by 30-70% depending of proximity.
- Impact on value of property by visual impact.
- Property prices are greatly and negatively affected by development (EMFs close by) auctioneers estimate 70-100% of value will be lost. Many properties will be unsaleable. Impact of father's life's work (to add value to family home).
- Devaluation not taken into account in EirGrid's costing of project.
- Development will devalue home and farm (Towers 282 and 283 on lands).
- Development will put property owner in negative equity, will place owner in a difficult financial position and take away their right and ability to sell property to move to a safer distance from OHL. The development will 'debt trap' owner into a high health risk area.

- On line reports highlight the impact of pylons on property values. Includes report in the Irish Independent (28/01/14) by members of the Real Estate Alliance from Kilkenny, Tipperary and Carlow stating that the proposed GridLink route would devalue land permanently along the route with property along the route increasingly hard to sell.
- Observer's lands at Derrypatrick, Drumree went to auction. Sale fell through due to proposed erection of pylon on lands. Land has been devalued by up to 25% of the original valuation. Has caused observer stress and unnecessary expense. Supporting letter from estate agent.

Impact on development potential of property/land

- Issues regarding sterilisation of land and reduction in the development potential of affected land for future residential, agricultural and/or commercial development. What right does any company, private or semi-state have to determine or influence this?
- Devaluation of land will have impacts on the retirement of local farmers.
- Burden on title deeds of property.
- Loss of future inheritance for children.
- Many landowners will be left with no lands available for housing their children. Younger generation will leave the area.
- Development will result in abandonment of plans to extend and redevelop residence.
- Property will be rendered unsaleable as a result of the development. Impact on elderly observer's ability to fund future care requirements.
- Due to length of time that the application has been in gestation numerous households lives have been placed on hold, not knowing whether their landholding could be used for building of family residences or business premises.
- Nullification of development efforts and funds spent to develop area.
- Will EirGrid pay to relocated planning permission and incur costs of same (house has permission in same field as a proposed pylon)?

Issues regarding compensation/community gain

- No compensation offered to offset devaluation.
- Compensation will be restricted to house owners within 200m of a pylon, impacts will be more widespread.
- No compensation unless pylons are on land even though views from property will be destroyed.
- Large areas of land are affected and if the proposal proceeds substantial financial compensation must be paid to all landowners and not limited to those whose land accommodates a pylon.
- NEPP assume that all properties falling within 80m of the development will be purchased outright and properties to at least 200m should be offered compensation dependent on visual and noise intrusion.
- Disagree that there will be substantial 'community gain' as stated by the applicant. No community grants will compensate for the impact on the lines on the public and on the landscape.

Impact on future population demographics

- There will be a huge sterilisation of land in the vicinity of the development over a very large linear area. It will impact on future population demographics.

Impact on businesses

- Impacts on healing practice and reduction in income due to proximity of pylon 204.
- Impacts of development on operation of private wind turbine.
- Impact on boarding kennels (noise from lines has distressing effect on dogs).
- Impact on Boles Hire Limited and Churchtown Music School (Churchtown House, Navan), with proximity to pylons and consequence of development that staff would have to work near same. Would move premises at great cost. Impact on music school. Pupils would leave school

Inadequate assessment of true cost of project

- Detailed cost benefit analysis, including all externalised costs for the project has not been completed and presented for public evaluation.

Social acceptance

- Almost unanimity regarding opposition to the route by residents and landowners along the route. Need for social acceptance has been ignored.

Impacts on rural activities and community facilities.

- Impact on landscape with consequences for income, national and international visitors (Hunt Club).
- Impact on cycling club (cycle throughout Meath and Cavan in areas along the proposed line).
- Secondary effects on local economy of proposed development through lands traditionally used by hunt e.g. Bective, Nobber, Kilmessen, Kilmainhamwood.
- Impact of OHL on horses and implications for where hunt meets.
- Impact on angling amenity (Anglers Club).
- Impacts of sterile corridor on Gun Club territory.
- Impact of development on activities along River Boyne e.g. kayaking.
- Social and economic impacts of development as a consequence of effects on Hunt.
- Impact on rural cultural events which generate local micro-economies e.g. Dunderry Fair (people attending),

Impact on Gaeltacht.

- Impact of development on Gaeltacht. People come to the area to improve their Irish. Proposed development will put visitors off and discourage people from coming into the area (building houses).

Other

- There are significant weaknesses in analysis of impact on human beings. Undue emphasis placed on applicant's responsibility and accountability for technical and engineering aspects of grid performance with no accountability for the population and socio-economic consequences of the development. Leads to incomplete and inadequate analyses of the overall effects of grid development on local populations and wider public.

- List of extant permissions is incomplete.
- Impact of the development on private open space of dwellings should be given and distance from sensitive land uses e.g. schools, childcare facilities, nursing homes.

Summary of Issues Raised regarding Human Beings – Land Use

Adequacy of EIS.

- Inability by EirGrid to gain access is a major weakness of the quality of the EIS. The limited amount of access granted should render the EIS so deficient in terms of accuracy and detail as to warrant rejection of the application.
- Evaluation confined to agriculture, forestry and horticulture. Fails to address impacts on equine industry.
- Recommended mitigation measures are an unacceptable infringement on a landowner's property (access to land during construction, risk of disease).
- A greater number of landholdings will be adversely affected by the development than defined by EirGrid. The clearance of trees, hedgerows and forestry and continued operational maintenance is an understated and ongoing impact.
- The impact on certain business enterprises (pedigree stocks, radio broadcasting, equine related businesses and others) is not mentioned. The proposed mitigation measures for a horticultural enterprise are of no value and the whole enterprise (with over 100 employees) will be placed directly at risk from the proposed development.

Impact on farming/agriculture/rural economy.

- Both farmers and landowners are concerned about the lack of importance given to agriculture and farming which is the backbone of rural communities. The proposal is being imposed on hundreds of farmer's landholdings against their will. It will result in the destruction of numerous hedgerows, acres of forestry and thousands of tonnes of valuable topsoil. It will drive a sterile corridor of 74m in width on farms for a distance of 140km across the north east.
- A comprehensive independent EIS must be carried out which specifically addresses the impact from a farming, agri-economic and rural perspective. All major farming enterprise including dairying, beef, sheep, equine, horticulture, forestry, tillage and poultry will be impacted by the proposed development. No single study of farming activities has been carried out and no alternative measures have been proposed.

- EirGrids lack of understanding of the type of terrain they are trying to cross.
- Development will have a negative impact on agriculture and farming.
Planning application requests approval to impose pylons on landholding against the will of the landowner. People and communities must be respected and listened to.
- Impact on agri-tourism.

Impact on image of industry/agri-food industry.

- Agri-food sector is the largest Irish owned productive sector accounting for over 50% of exports from Irish owned manufacturing. The farming communities of Meath, Cavan and Monaghan are an integral part of this agri-food industry.
- Ireland is an agriculture based economy with a GDP of 174,000 million euro exporting 80-90% of beef and dairy produce. Agri-food industry has added value to the primary food by innovative processing and marketing of added value products for home and international consumption. Ireland is now branded 'The Food Island'. It is totally reasonable that any potential hazards be considered in a risk analysis format (including EMF exposure).
- County Meath has one of the largest agricultural outputs in Ireland, valued at €358.6m and forestry output €1.5m with agricultural exports of almost €500m. Agriculture in Meath supports thousands of jobs in the rural economy. The Agri-food sector is increasingly important in supporting Ireland's economic recovery. Higher quality and traceability are demanded by the Department of Agriculture, Bord Bia, retailers and customers. The logic and the requirements of food traceability mean that we cannot hide the existence of pylons and OHLs in our area. Development runs counter to promoting Meath as a high quality green food producing county.
- The development will destroy the image that the industry seeks to create of a green and clean environment to produce meat and milk, most of which is exported.
- Farmers are bound by a raft of local, national and European rules and regulations to protect the environment and the current planning application is at odds with this (e.g. REPS).

- Impact of development on rural employment in sector (retailers and end users of products are auditing local farms and they are concerned about the environment, animal health and welfare).
- Need to address environmental, economic and social impacts of development.
- Agriculture/food production should not be sacrificed to provide power.

Impacts on the food chain.

- The food chain could be affected as grass eaten by milk producing cows and cattle could be tainted by the OHLs and this milk and beef could enter the food chain.
- The food produced in Monaghan will not have the same status because of the OHLs.
- Impacts on Lough Egish Food Park, which enables many food based commercial enterprises to prosper as well as presenting significant employment in the immediate environs of Lough Egish and surrounding areas. It cannot afford negative health and environmental issues which may threaten its existence.

Impact on farms arising during construction and operation.

- Reduction in area of landholding that can be farmed and impacts on livelihood. Many farms are very small and rely on farming as their only means of income.
- Detrimental effect on the small farms in Co. Monaghan, which are much smaller than the national average. Many holdings are already divided and the pylons will cause further sub-division.
- Area of land taken up by pylons with large bases will ruin small fields.
- Pylon bases present obstacles to using farm machinery.
- Significant disruption to farming and farm management during construction. Particularly relevant for smallholdings where areas are fenced off.
- The security of livestock and access to livestock during construction is a serious concern. Removal of hedgerows that form barriers to animals.

- Impact of construction on drinking water for livestock.
- Destruction of farmland and soil by heavy machinery and impacts on land drainage.
- Spread of disease/noxious weeds and cross contamination by construction staff.
- Increased risk of TB.
- Impact of noise on farm animals during the construction and operational phase.
- Nowhere else to move stock.
- Construction impacts are significant and little succour is provided in terms of the mitigation measures proposed.
- Farm operations will be of secondary concern as EirGrid's operations will take precedence. EirGrid will effectively take over individual farms for duration of construction period.
- Agricultural land will be rendered sterile along the 1km wide corridor.
- Farmers work in tandem with the seasons and no provision has been made for the disruption that will be caused if the project goes ahead.
- Development will result in pre-construction impacts, construction impacts and residual impacts:
 - *Pre- Construction Impacts* – interference with use of assets, decision making/planning, curtailment of options from financial benefit of site disposal, expense and time consumed keeping informed of development (dealt with under Population and Economic).
 - *Construction Impacts* – bio-security and animal disease; restricted access to farm; temporary loss of land; noise and dust nuisance; disturbance to field drainage, soil disturbance; impact on water, fencing, farm roadways; straying livestock; crop disturbance/damage; loss of shelter; health and safety; loss of area to area based rural subsidy schemes; disruption to crop and animal husbandry; risk of accidents and death; extra labour and supervision impacts; and implications for owners public and employers liability insurance needs.
 - *Residual Impacts* – loss of land; disturbance to farm operation/increased costs; restricted use of land in close proximity to

line; loss of shelter; bio-security risk with maintenance of line; restriction on farm enterprises; health and safety; jumping of electricity from OHL to electric fences etc.; implications for future farm buildings and infrastructure; risk of accidents/death; increased risks during weather events; lack of freedom to plant trees etc.; on-gong costs with maintenance of wayleave; restrictions on choice of sites for new dwellings; restrictions on the use of farms for equine or study enterprises; and health risks to animals in close and continuous proximity to lines.

- Impact on rotational system of dairy farming.
- Impact on suitability of grazing land for equine stock; exercise tracks; image of farm; aesthetics of equine enterprise.
- Impact on dry stock enterprises (beef, sheep); impact on management of farm (if more time needed to manage enterprise as a consequence of development e.g. loss of field usage), impact on image.
- Impact on tillage farms; impact on image/reputation; impact on efficiency of large equipment (working around pylons).
- Impact of lines on equipment (computerisation in modern machinery).
- Noise arising – lines to be erected less than 50m from working yards.
- Impact of cement lorries on land, wheel rutting, disturbance to livestock, risk of spreading animal and crop diseases, impact on water table (as a result of pouring c.26 tonnes of concrete).
- Impact on sheep enterprise (disturbance to ewes and lambs at all stages of the construction programme).
- Farm will be cut in two by lines meaning that all work will be carried out at short distances from power cables, greater safety risk, impact on performance, health and fertility of animals, risk of spread of disease during construction, impact on normal farming activities during construction.
- Impact on dairy farm (pylons 155m from house). Proposed access route is entirely unsuitable, used as a lane for livestock and light machinery. Would not carry heavy machinery/equipment as proposed.

- Impact on small fields, making them impossible to use. Paddock is also sown as a wild bird cover (nesting ground and feeding ground) under GLAS scheme. Would not work if there was pylon and power lines in the field.
- Agricultural contractors will not be willing to work on the farm if the development goes ahead with adverse impact on the observer's livelihood (and others like him).
- Impact of development on pedigree Friesian dairy farm (highest European standards in place, growing business, potential of being a world class training centre for new dairy farmers).
- Impact of pylons on land rented for farming enterprise (pylons interfere with staff, livestock, contractors working and occupying space around the pylons).
- Risk of diesel spillages and soil erosion during construction.
- No information on how tenants will be treated during and following erection of pylons.
- Will diagonally cut across section of a field used by in-calf heifers. Inevitable proximity to line and effect of EMFs on abortion rate and health which would jeopardise the farm enterprise.
- If development goes ahead observers will not spend their future dairy farming under difficult working conditions and environment, both for themselves and their future families and livestock herd. Studying Agriculture, planning to study agriculture and take over the family farm.
- Project is being railroaded through prime agricultural land and EirGrid expect farmers to facilitate construction of development with total disregard for the operation of daily farming routine (milking, feeding, sowing, planting). EirGrid's attitude and approach to the planning of the project is deeply flawed. It lacks thought, consideration and knowledge of the farming industry and environment.
- Impact of development on business (Meath Farm Machinery). Observer sells a substantial amount of equipment to farmers which vary in height. The equipment would be compromised by the height of the proposed lines between pylons.

Impact on farm schemes/farm payments.

- Loss of income through Single Farm payments and other entitlements, (Basic Farm Payments Scheme, AEOS/GLAS Schemes and Greening) which will be reduced with structures on land that is set aside.
- Impact of development on compliance with Nitrates Directive.
- Expense in needing to reapply for same.

Impact on value of farm, future development and efforts to improve same.

- Investments made in improving/reclaiming/draining land, farm practices and improving and preserving buildings will be rendered useless.
- Development will have a major negative effect on farms and on the value of farmers' landholdings. Farmers in the area have built up their holding over many generations and should not be at a loss because of this project.
- Impact on financial future and planning of farm.
- Impact on planning permission for future development of businesses and homes.
- Repercussions for livelihood of farm owners and staff arising from impacts on livestock.
- Future development by young farmers (planning permission being refused/health risks deter).

Health and safety.

- Farm safety as some wires come as close as 20m.
- Exposure of farmers to risk greatly increased e.g. negotiating machinery on slopes without added complication of paying attention to high voltage lines.
- Increased safety risks associated with the lines due to their high voltage and the low sag proposed by EirGrid, with as low as 9 metres from ground level being proposed. Much of the farm machinery can extend well above this sag level e.g. exceptionally high loads (e.g. bales) irrigating crops with rain guns, high trajectory spreading of slurry etc.
- Exposure to constant risk of electrocution.
- There are numerous studies highlighting the negative impacts of OHL on livestock, bloodstock and crops.

- Concerns regarding impact of development on human health and animal welfare. It is of particular concern to dairy farmers due to impacts on somatic cell count and associated costs.
- Increased risk of abortion in cattle. Impacts on milk yields.
- Animal health considerations – The electricity distribution network in France was required to pay compensation for the ‘direct, material and certain’ prejudice suffered by a dairy farm at Latronche (Correze) established by a power line of very high voltage. The Courts established a direct link between the power line and the diseases amongst animals.
- Impacts on drinking water for livestock.
- Removal of hedgerows that form barriers for stock.
- Health and safety major concern as farmers will have to work and live under lines (including EMF emissions). Walk stock under lines 4 times a day for milking.
- Risk to grazing animals. Impact of development on fertility of breeding animals and yields from milking cows and chickens.
- Concerns regarding impact on young stock, in-calf replacement heifers and pedigree dairy herd. Concerned regarding ‘arcing’ and risk of electrocution of animals. Health risks posed to students (farm is a recognised training farm for young farmers from UCD, Ballyhaise and Teagasc). States that ESB workers are not allowed to work under pylons for an extended period of time. Observer took part in the Rural Environmental Protection Scheme and have hosted European Ministers, discussion groups from all over the world, veterinary groups etc. The lines jeopardise their future as a leading dairy platform. Request that the Board look at what European counterparts are practising to provide a safe environment for future generations.
- Concerns regarding health effects of development to family and livestock. Lines go over land (Bord Bia Quality Assured Beef farmer). EirGrid have not contacted observer about how they are going to construct the lines or gain access to lands.
- Proximity of home and farm to line (house is c.140, yard is c.50m). Concerns re implications for livestock which are housed for five months of the year in a

shed that is within 50m of the pylon and wires. Impact on fertility of stock (sheep and beef cattle).

- Health effects on workers given proximity of line. Impacts on livestock with repercussions for livelihood of farm owners and staff.
- Health and safety risk to all contractors and employees.
- Concerns for livestock exposed to EMF long term, and of family and own health.
- EIS contains no health and safety plan for all workers during the construction phase of the project.
- Impact on dairy farm (pylons 155m from house). Animals would pass under line at least twice each day and farmer four times. Farm would not be suitable for all other types of farming e.g. tillage and would become worthless. Lines are c.100m from farm buildings that they work in.
- Impact of the development on herd health (some farms operate closed herds).

Compensation and Payment.

- Loss of income where land is rented due to lengthy period of disturbance associated with construction period.
- Insurance companies will not indemnify farmers against claims for injuries caused by pylons and power lines on their property.
- No mention of compensation for loss of crops or grazing land (erection and maintenance of line).
- Exposure to future litigation issues (health claims ensuing from neighbours if pylon on farmers' land).

Impacts on Equine Industry:

- Impacts on equine industry and on horses generally whose sensitivity to OHL is well proven.
- Impacts on equine enterprise at Terrygreehan stud farm at Drumhowan and on horse enterprise on LCT 003.
- EIS fails to address the impact of the development on the equine industry in Co. Meath. There are a number of equestrian centres and stables throughout the County, Bachelor's Lodge Equestrian Centre is 1km east of OHL and

equestrian activities take place throughout the county. Linear development runs through heart of the County.

- Impact on equine species (restless and agitated). Research indicates detrimental effects on bloodstock as a result of long term exposure to radiation from high power overhead lines, including failure to thrive and breathing problems. Development is 200m from equine business (Derrypatrick House, Summerhill), breed and train horses and have a thriving sheep farm. Concerns re effect of lines on family and staff (working in close proximity). Visual impact on visitors and impact on business, impact on value of property.
- Impact on bloodstock industry (equines). Horses very susceptible to EMF and develop lower red blood cell counts. When horses are worked in areas with extra high voltage power lines they often refuse to jump and become very hard to handle. Horses refuse to trot close to lines and can become 'spooked' by noise/shadows caused by them. Even at long distances noise emissions or EMF emissions can cause them to become very agitated. Impact on workplace.
- Bective stud farm has many overseas buyers who comment of the beauty of the Boyne valley. Limestone soil of Meath is world famous for producing high quality horses. Planned pylons will reduce appeal of country to foreign investors in horses, decrease jobs in stud farm, reduce value of homes and farms.
- Development will be disaster for stud farm (breeding race horses for the flat), for brood mares, foals and yearlings, as well as other livestock (Moortown House, Donaghpatrick).
- Associates in the industry confirm that where heavy overhead cables occur there has been an increase in mares aborting.
- Impact on bloodstock rearing and training business. Lines go directly behind and to the side of the property. Purpose built holding purchased in 2005. Has planning permission for home on the site close to business. Business includes 5-furlong gallop, 15ft wide, 265m schooling ground for both hurdle and chase training, numerous stables, feed stores and barns, horse walker, lunging pen and many acres of grazing. Purchased and developed land

because of its natural beauty and no high voltage lines on or near it. Business would be at serious risk if development goes ahead. Low flying helicopters and unrestricted access for repair and maintenance would pose huge disease control issues for stud owners. Safety of horse handlers and riders will be put at risk and health and safety premiums would rise. There are 17,000 people employed in the bloodstock industry and 80% of thoroughbred foals are exported. Ireland is the fourth largest producer of foals in the world. There is a lot at stake.

- Impact on stud farm, within 250m of farm, major threat to equine activities carried out on a daily basis.
- Plans by EirGrid to erect thousands of extra high voltage lines and pylons across the country is a major threat to livestock industry. High voltage overhead power lines, should not be built close to horses or stud farms where horses are being bred or trained.
- The Irish Racehorse and Racehorse Breeding Industry is the global leader in its field and is an indigenous industry that concentrates in areas such as Wexford, Cork, Tipperary and Co. Meath. Some of the leading farms, producing the best and most expensive horses will be affected by the proposed development. Concerned about the message this gives the world about what we, Ireland, think of this huge source of rural employment. To maintain status as one of the leading centres of racehorse breeding, we need to maintain the environment, landscape, and the grassland that compliments the production of high class horses for international markets. Ireland is an export country of horses and it cannot be taken for granted that other markets wouldn't slip into the void created by not protecting our own industry. It has taken generations and years of refinement to get to the position where we find ourselves at the top of the global market. It is imperative for these farms and communities, bringing employment and investment into rural areas that have no other prospects of investment, that nothing upsets this balance (Goffs Bloodstock Sales Ltd)
- Object to proposed development on behalf of 433 registered breeders on two grounds; extremely negative effect on horses and health risks from working in

the vicinity of pylons. Also impact on landscape. (Irish Thoroughbred Breeders' Association)

- Racehorse trainers play an important role in the economies of many rural areas in Ireland. Their pursuit of excellence has helped put Ireland on the map internationally in terms of success on the track and demand for Irish bred horses. Development is a major threat to Irish racing and the livelihood of racehorse trainers in vicinity of the line. 60 licenced trainers in Co. Meath, second highest number in Ireland (Cavan, three, Monaghan, one).

Development could affect the exercise regime of every horse within nearby training facilities. Impact on safety of rider (horses spooking/startling at shadows and noise). Placing pylons and electricity lines directly within the horse's range of vision and earshot is abandoning all the safety precautions the trainer has put in place. Impact of lines on road work (for rehabilitation and muscle development) and placing horse and rider in danger, loss of earnings, threat to employee's positions and loss of potential clients. Sleep disturbance possible concern from noise and EMFs created by pylons and lines. Thoroughbred horses need calm and undisturbed environment when resting or will impact on performance on track. Implication of pylons on insurance premiums, employers' liability and public liability. Concerns regarding health concerns to trainer, employees, animals; safety of animals and handlers; rise in insurance costs; owners withdrawing horses from yard (3 or 4 losses, means a lost job); reduction in future owners; reduction in future training facilities; impact on livelihood of trainers and employees (Irish Racehorse Trainers Association).

Impact on forestry.

- Impact on income arising from forestry that will be cleared with construction of line.

Conflict with policy:

- Contravenes Meath County Development Plan and aspirations of Glas scheme, greening initiatives and Sustainable Dairy – Beef schemes.

Cumulative Impacts:

- Cumulative effect of planning decisions (windfarms, incinerator, waste processing, pylons etc.) on agriculture/rural development.
- Cumulative effect of proposed development with existing 200kV line crossing Kiltale IFA branch area.
- 7 farmers already affected by pylons in Culmullen area, 3 new farmers will be affected. Culmullen over populated by cables.

Site specific issues.

- Pylons located in fields to cause maximum impact on farming activity rather than on boundaries, pylons could have been placed on a nearby ditch.
- Proximity of pylons to shed used for overwintering large herd of cattle.
- Impacts on breeding of pedigree cattle and sheep.
- Impacts on hens, egg production and quality.
- Incompatibility with organic status of farm on which pylon 136 and 137 will be placed.
- New poultry house on land parcel LCT 011-012-013 constructed in 2011 is not included on EirGrid maps, which renders EIS incomplete. The power line is very close to the shed and should be investigated by the Board.
- Impact of large pylon structure on small farm holding (LCT-205).
- Pylon 217 is much too close to house and farm buildings. There would be issues if observer wished to build a slated shed in the future.
- Impact of development on existing right of way (LCT 222).
- Mr Michael Farrelly (Corryholman Kingscourt) raises issues regarding pylons running through his fields (LCT 226) and the proximity to a shed where up to 170 cattle are over wintered. He has concerns regarding the impacts of EMFs on his cattle, their welfare and the future of his livelihood.
- Location of access track relative to LCT-081.
- Access to Pylon 139 is in separate ownership. No gap, so a large opening will be created. Route will bisect fields with no attempt to follow the boundary hedge. It is not understood why Cornaure Road which provides more direct access is not used.

- The farm is a mixed enterprise which is used for grazing cattle, horses and sheep and is not a sheep enterprise as described by EirGrid.
- Use of access route to dwelling and farm buildings (LCT-056A) will result in demolition of farm buildings.
- Access track to pylon going straight through a well. Access to guarding stations goes over well and pumphouse.
- Risk posed to spring well and pump that lie in the path of construction access to pylon.
- Impact of pylon 145 in the middle of a good field.
- Location of pylon 135 obstructs access to remainder of landowner's fields.
- Pylon 147 will split farm (LCT-087 and LCT-087A) in half.
- Proximity of shed to pylon 107.
- Towers 354 and 355 at Rathnally impact on Rathnally Stud (impact of EMF for breeding horses).
- Directly affected by pylons 307 and 308. Concerned regarding health risks of EMFs day and night for future (live and work in same), potential risk to livestock. Land farmed for generations, some members of family built houses on lands and younger generation were able to look after older generations. Had hoped that his family would continue this tradition, but his family do not want to rear children under power lines. Whole family structures are falling apart to people that live in towns.
- Health risks posed by development on observer's brother and family (pylons 307 and 308 will be erected on their land), working daily under the lines. Impact of development on livestock and crops. Impact on hedgerows, trees and soil.
- Two pylons, 282 and 283, will inhibit ability to farm effectively. Pylon 283 is located centrally in a big field which would impact on ability to produce crops efficiently in the area. Object to use of main private residential avenue to access proposed site. Impact of expanse of temporary access roads on long term damage to soil and field surface. Concerns regarding exposure of young animals to electromagnetic fields.
- Have a dairy farm in Clooney area, have invested significantly in same and built up a herd from 4 to 140 cows. Carried out infrastructure developments to

enable them to farm more efficiently and safely. Pylon 280 is proposed on the most valuable and accessible grazing paddock on the farm. Pylon is closest to N52 and larger than other surrounding pylons. Development will impact on ability to farm safely and effectively (location and proximity to dairy parlour); impact on system of disposing of waste water (pumps water up through air to grazing paddocks); inappropriate access to pylon site (use of main entry to farm, 5m from bulk milk tank which milk lorries need 24/7 access to); proposed access is on farms private roadway which gives the herd 24/7 access to all grazing platforms and water, not possible to cease use of access during construction; temporary stringing areas proposed on land required for herd 24/7; maps used by EirGrid out of date and do not show extensive road systems on farm; impact on plans to develop underground pass to traverse N52; impact of EMFs on somatic cell count (dairies pay for milk on basis of same) and risk to farm income; impact on property value; visual impact of same; health effects of long term exposure to EMFs.

- Impact of pylons 350-352 on family farm and concerns regarding health; heritage; landscape; tourism; agriculture/hedgerows/top soil/sterile corridor 74m wide; devaluation of properties and land; alternative exists.
- Two pylons proposed on farm (landowner no. 045-2). Dangers posed by EMFs (to selves and livestock) on a daily basis for 8 months of the year while gathering milking cows morning and evening on a daily basis.

Summary of Issues Raised regarding Human Beings – Tourism and Amenity

- Monaghan is not a tourist destination but has niche markets such as fishing and outdoor pursuits which require protection.
- Negative impacts on the Monaghan Way in Clontibret area.
- Concerns regarding impacts on the setting of many drumlin lakes.
- Potential tourists will be discouraged from visiting due to pylons.
- Negative impacts on potential for agri-tourism diversification.
- The EIS does not take into account that there are countless untapped enterprises that could be developed in the region e.g. small visitor centre to bring rich mining history to the fore etc.
- Cavan is an up and coming tourism destination which a large number of lakes, natural drumlins and unmatched tranquillity and beauty. The installation of the unsightly large pylons would fly in the face of any efforts by Tourism Ireland to stimulate the recovering economy and to encourage tourists to visit. The development will result in eyesores and the fall off in visitors will impact on local village shops, restaurants and B&Bs.
- Adverse impacts on the recreational amenities of Lough an Leagh which draws tourists into the area. The local community hold numerous annual events such as a Mass Rock, Pilgrim Walk, and gatherings on the Mountain. It is also used for An Post Ras, An Post Charity Cycle, Cavan Walking Festival etc. It is part of the local heritage office 'Golden Way' which focuses on the natural unblemished beauty in specific areas. This will be negatively impacted by the proposed development.
- Impact on Muff fair and Muff area.
- Proximity of Doohamlet School and Childcare Ltd. (1100m-1500m), Ballynagearn NS and St. Oliver Plunkett NS.
- Impact on Muff NS.
- Draw the Board's attention to the importance of angling as a tourist attractor
Concerns that the proximity of the line of pylons to some of the lakes may impact on angling amenity, in particular, Lough Egish (117ha Pike Fishery) and Lough Morne (45ha game fishery containing brown trout).

- Concern that general amenity value of the Castleblayney-Ballybay Lakelands area may be detrimentally impacted visually by the proposed development, for example in the general vicinity of the proposed development and Corlatt Lake/Shantonagh Lake (coarse fishery) and Tonyscallon Lake (bream).
- Development will impact on the natural unspoilt beauty of the area and devalues the countryside.
- Development will impact on the amenity of schools, sports clubs, playing pitches, informal cycling routes, individual properties, residential development and rural communities and villages along the route (County Meath).
- Impact on amenity of river valley and angling waters with impact on tourism and visiting anglers e.g. Bective Angling Club, Kilbride Anglers Club, Whitewood Lake Development Committee.
- Impact on amenity of outdoor activities e.g. Moynalty Cycling Club, Hunt Clubs/Harriers, Boyne Valley Activities, Trim Canoe Club and rural cultural events e.g. Gibstown drive in bingo, festivals and visitors to same.
- Impact on heritage assets along the route e.g. Hill of Tara, River Boyne, Trim, Bective Abbey, Boyne Valley area, Donaghpatrick/Teltown/Gibstown, Derrypatrick Church and graveyard, views from church in Nobber, Ardbraccan House, Bloomsbury, Brittas House, Whitewood House, with negative impacts on tourism.
- Impact on amenity of Gaeltacht area and visitors to same.
- The location for the proposed development is a major tourist asset (Trim Castle, Tara, Bective Abbey etc.). The visual pollution of the countryside by the pylons and overhead lines will damage the image of the area thus jeopardising the tourism potential, resulting in the loss of business and hospitality.
- Impact of development on local tourism market has not been adequately assessed.
- Whilst some attractions are removed from the line, the OHL will render the approach routes to such attractions less attractive.
- The principal asset of the tourism industry is the area's natural beauty. Development will nullify work done in the area to promote tourism e.g.

restoration of old graveyard and adjoining Church in Nobber village, Greenway Cycle Path.

- Impact of development on Rahood House. Tower is within 70m of house which has tourist accommodation.
- Efforts to increase tourism to north east would be undermined. The towns of Kells, the Boyne Valley, Slane, Lough Crew and the Hill of Tara are just elements of a larger macro-tourism region, not just Meath. Dividing this area with high voltage lines would have a massive negative impact on this development potential. No proper cost benefit analysis carried out.
- Development will have a significant negative impact on the success of the newly launched 'Ireland's Ancient East' tourism plan. The proposed lines will be visible from the Hill of Tara site and will pass very close to a recently renovated 'Bective Abbey'. The cost of lost revenue from tourist would greatly surpass the cost of undergrounding the lines over the lifetime of the pylons.
- Impact of pylons on Greenway proposed for old Kingscourt to Navan Railway line which passes by the scenic Whitewood Lake.
- Route passes close to Trim area which has built up a comprehensive tourist industry with a number of medieval castles, abbeys and historic buildings located there. The proposal will result in the loss of tourism revenue and potential tourism revenue due to the proximity to sites.
- EirGrid failed to record the sixth most visited attraction in Co. Meath, Bective Abbey which is not marked on the map of visitor attractions and is located less than 800m from the line and would be adversely affected.
- Impact on Boyne valley a celebrated tourist attraction and heritage site.
- Bord Failte survey of tourists highlights importance of scenery, people, natural unspoilt environment, safety and security and natural attractions to visitors. If development goes ahead it will impact on at least two reasons given for visiting Ireland 'beautiful scenery' and 'natural unspoilt environment'. Effects of development on tourism will be more pronounced when the social class of visitors is taken into consideration with 85% of tourists ABC1 (45% > 45 years old), who are particularly aware of/affected by industrial blight to landscape.
- Development's impact on the landscape and actual and perceived industrialisation will have a disadvantageous effect on tourism numbers in the

area where a large number of panoramic landscapes will be affected by the development. Vistas from Trim Castle, Bective Abbey and the Hill of Tara will be substantially impacted upon and devalued.

- Refer to a study in Salzburg (Austria) which identified a 19% loss in tourist numbers following an OHTL development in the region. Tourist revenues would decline with landscape devaluation if development proceeds.
- Risk of job losses if decline in tourism.
- Refer to Meath Tourism's description of the County. State that many of the main tourist attractions referred to would lose overseas visitors once the vistas referred to are damaged e.g. Boyne and Blackwater River Valleys.
- Impact of development on heritage of the county.
- Impact on Boyne Valley Driving Route including area close to Bective Abbey and Baile Ghib.
- Development will have a major adverse effect on two tourism related businesses in close proximity to the line, Trim Airfield (refer to Appendix 4 and 5 of NEPPC submission) and the Irish Balloon Flights.

Summary of Issues Raised regarding Flora and Fauna

- Restricted land access has resulted in a lack of baseline surveys. It is estimated that EirGrid have not laid eyes on possibly up to 50% of the route. This is in stark contrast to the position in N. Ireland where the majority of the route has been walked twice. In the context of the project being a PCI, a common approach should have been taken regarding ecological studies.
- It is unacceptable that baseline studies can be postponed until planning consent is granted.
- The line bisects the known flight path of Whooper Swans between Ballintra and Tonyscallon and Toome (Crinkill) Loughs. The residents of the Doohamlet area will testify that Whooper Swans come to this area every year, albeit in greater or lesser numbers, without fail despite the EIS recording no activity in 2012/2013. The residents' information is wholly confirmed by Volume 3C Appendix 6.6 Table 4.2 regarding a definite slight line crossing the route and a maximum of 25 swans recorded in 2014. This is the only location in the CMSA where a definite regular flight over the proposed line has been established. There is no doubt in the mind of residents that there will be collisions resulting in dead swans.
- Whooper Swans fly from Tassan Lake in the direction of Clay Lake in Keady and their flight path is in the direction of the power lines.
- Disruption to flight paths of migrating birds i.e. Whooper Swan that fly between Terrygreehan and Ballintra feeding grounds to Toome Lake Swan flight paths between Lough Nahinch and Black and White lakes in Tonagh and between Barragh Lake and Lough Egish between Lough Mourne and Lough Egish.
- It is stated in the EIS that Lough Nahinch and environs is not important for Whooper swans and no flight lines were observed. Photographic evidence proves to the contrary.
- Impact on Whooper Swan, with development intersecting flights in vicinity of River Blackwater, Donaghpatrick (in particular at dawn and dusk when fog rises on River).

- Impact of development on Whooper Swan as they cross development as they move to and from roosting sites (Cruicetown area). Development will destroy winter habitat.
- Impacts on Black and White Loughs in Tonagh have not been assessed.
- Impacts on Moore Hen (populations declining) in pond adjacent to Pylon 172.
- Questions arise regarding how effective line markers will be. It appears that a complexity of factors come into play with regard to the success or otherwise of these measures. Each site is unique with regard to topography and micro climate and what is successful for one site may not always work in another. For example, line markings may not be so effective in low lying sites prone to early morning fog when the birds are flying from the roosting site to the foraging area.
- The line is an optimum location to pose maximum danger to birds in this area, bisecting their roosting and foraging sites. The only mitigation measure to guarantee no mortalities is complete avoidance.
- It is noted that the Board recently refused permission for a small wind farm in Co Roscommon on the grounds of impacts on Whooper Swans (PL 20.243479).
- Lough Egish Rod and Gun Club grounds will be dissected in two. The line passes close to two important snipe bogs and an area where Whooper Swans overwinter and where there are swan and ducks' flightpaths. It crosses a small and vital part of a wild brown trout lake.
- Many listed species (otter, bats, numerous bird species) are found in habitats in the area. Restricted access to land has impacted on surveys of otters, badgers and other species. Only six badger setts were identified in the EIS, compared to 36 found along the alignment in N. Ireland. It is not believed that there are less badger setts in Monaghan and Cavan than in Armagh and Tyrone.
- EirGrid have not had access to individual landholdings and it is unclear how effects on local wildlife and fauna can be determined.
- The EIS makes reference to a bog in the townland of Corlea in Co. Monaghan but fails to either quantify the impact on the area or highlight the significance of the bog.

- Damage to Cashel Bog, a habitat for a wide variety of wildlife.
- One of the questions An Bord Pleanála needs a credible answer to is why the alignment changes direction from pylon 126 to pylon 103 at the border. In doing so the alignment comes close to Tassan Lough pNHA, Tassan Mines pCGS, crossed over protected species of orchids in Tassan grasslands, impacted on drumlin topography, oversailed the Monaghan Way, traversed the elevated Lemgare Rocks which is located next to Drumgallon Bog pNHA with March Fritillary, an Annex 11 species. This element of the route makes no sense from a conservation of habitats perspective.
- Tassan Grassland is identified by EirGrid as *‘an excellent example of neutral to acid grassland with abundant orchids’* with an evaluation of National importance. If the area is of such importance why is EirGrid allowed to carry out construction work at this location, which has remained untouched and where rare orchids survive. It also supports a wide variety of other wildlife including butterflies, dragonflies etc. that prosper close to Cashel Bog.
- The area between Pylon 114 and 115 is a wetland that borders Tassan Lough NHA. The development will have a serious impact on this wildlife habitat. Most of the water gathers in the wetland area from the surrounding hills. The use of heavy machinery will impact on drainage channels disrupting the natural drainage to this land.
- Tassan Lough pNHA is located approximately 250 m south of the alignment and is ecologically and environmentally sensitive. It is bordered by Tassan lead mines which has five shafts. These mine shafts are hidden underneath the surface and proceed in the direction of the power lines. It is unclear how it can be concluded in the EIS that there is no potential for adverse effects without a proper investigation of the site.
- Impact on Tassan Lough has not been fully assessed with regard to the potential for toxic lead water run-off from disused mine shaft which are highly likely to be disturbed during the construction of Pylons 116 and 117.
- Despite re-assurances of best practice construction techniques, a thorough risk assessment of the area between Cashel to Lemgare using sink holes should have been completed as part of the EIS.

- It was also concluded in the EIS that there was no potential for adverse impacts on Drumgallon Bog pNHA, despite the UK and European recognition of ASS1182 as a site of international importance for protected species such as the Marsh Fritillary.
- Drumgallon Bog lies in close proximity to the proposed powerlines. It is home to the March Fritillary Butterfly, which is a protected species. There is well documented evidence to back up the argument that March Fritillary Butterfly occurs in the Drumgallon/Lemgare Rocks area. The development will have a detrimental impact on the conservation and propagation of this rare species.
- Carragh Bog is an area of natural importance for local flora and fauna. Interfering with this ecosystem will cause it to break down and further endanger the already endangered species which rely on this haven as a sanctuary from other over farmed and exploited areas.
- Carragh townland is on a swan flightpath. Swans are observed numerous times a year as they migrate between lakes. Pylons will interfere with this behaviour and have a major impact on their breeding habitats.
- The proposal to cross the River Boyne and River Blackwater, which are both candidate SAC's is an unacceptable degradation of an asset that should be protected.
- Impacts on fish stocks in rivers/lakes arising from sediment run-off during construction.
- Impact on the health of fish stocks (EMFs) and on migration of fish in spring, summer and autumn runs (Trim, Athboy and District Angling Association).
- Impacts on bats that live in a porch of house owned by Ms Teresa Fleming Cordoagh. Kingscourt.
- Impacts on bats nesting in a shed at Shantonagh, in a barn and on LCT-082 lands. Detailed bat survey should have been conducted along the route of the alignment. Have old derelict buildings and ruins along the alignment being visited to allow the conclusion to be reached in the EIS that there are no know bat roosts in the area? The suggestion that bat roosts in trees may be temporarily lost is contrary to EU and National Law.
- Impacts of EMF on bats. Studies have shown that they are particularly sensitive to electromagnetic radiation.

- It is believed that there is a rare form of heather or wild orchids on Lough an Leigh mountain and that it is a breeding place for Pelican Falcon.
- Removal of trees and hedgerows that are hundreds of years old and loss of foraging breeding areas for wildlife.
- Physical inspection of a hedgerows should be a pre-requisite.
- In relation to ecological survey works, many surveys were conducted 'at alignment road crossings'. Given that the alignment passes over agricultural land for the most part, are these surveys representative to draw definitive conclusions.
- Damage to trees/hedgerows, land, drainage etc. caused by corner Pylon 109.
- Access to pylon 108 will be constructed over Lemgare Rocks which is an ecologically sensitive area.
- The EIS is materially deficient in numerous aspects including the fact that the initial choice of route was the most damaging to Whooper Swan safety and flight line.
- EirGrid has failed to identify and record protected species locations and likely significant effects for species such as curlew, sparrow hawks, snow bunting, grey partridge and smooth newts amongst others.
- The EIS is partial and not in accordance with statutory requirements as access was denied to many of the tower location sites. EirGrid does not have local knowledge available to it on ecology and accordingly its information is deficient and incomplete.
- A number of protected species have been recorded at locations which EirGrid are unaware of and have not considered in the EIS.
- At several locations impacted directly by the development watercourses and wetlands are known breeding grounds for the smooth newt. These locations area specifically protected but not considered by EirGrid.
- At a number of locations EirGrid proposed clear felling of semi mature and mature coniferous woodland creating barriers for population migration, imposing damage to resident populations.
- EirGrid does not have detailed studies of vegetation and flora, invertebrate and insect speciation due to the incompleteness of the EIS.

- There are issues with the impacts of magnetic field on the ability of certain migratory fish to be able to return to their rivers of birth. EirGrid offers no research/studies on how protected species such as Atlantic Salmon, Estuarine Lamprey and Yellow Eel could be effected.
- Landowners have reported the location of many endangered and protected species which occur along the alignment that are protected under the Wildlife Acts and which have not been recorded by EirGrid.
- The plans proposed involve clear felling of large tracts of woodland and hedgerows in which bat roosts are likely to occur. EirGrid does not set out any time moratorium when construction activities will cease during hibernating and breeding seasons for such protected animals.
- No studies are presented on disturbance of otters and other species living in proximity to the crossing of protected SAC areas on the Boyne and Blackwater drainages.
- A major issue concerns the presence of the winter visiting Whooper Swan population. It seems extraordinary that EirGrid choose the most impacted route as its preferred route corridor and stated in the original application that survey work would be on-going to determine the level of impact on individual sites.
- EirGrid is requesting the Board to assess ecological impacts on almost no evidence and to worry about the consequences later, which is clearly contrary to Article 5.2 of the EIA Directive, which requires that information presented 'shall include the data required to identify and assess the main effects' and that appropriate data should be included as part of the approval process rather than post approval.
- Impact of the proposed development on Whooper Swan in the Dowdstown/Wilkinstown area (Tower 290), on banks of River Boyne and Blackwater, at Oristown, at Teltown (Tower 309), at Clongil, Donaghpatrick and when moving between Tara Mines tailing pond to the River Blackwater.
- Whooper Swan is a listed species in the Boyne and Blackwater site and therefore require full consideration in the Appropriate Assessment of the site. There is no evidence that consideration of alternatives to the proposed project had been undertaken in the data provided in the application (Appendix 9).

- In the consideration of the impact of the development on the conservation status of the Boyne/Blackwater site, no consideration was given to the impact of EMF on the life cycle of Atlantic Salmon. There is some evidence of impact of EMF in distortion of salmonid migration patterns. Which should have been explored in the Appropriate Assessment.
- Little consideration given to impacts on migratory fish stocks within the watercourses impacted by the proposed development, nor on the effects of local angling clubs and tourism revenue generated by angling in the area.
- The proposed development causes major challenges to protecting the integrity of the Boyne/Blackwater SAC and in avoiding unacceptable impacts on numerous flora and fauna species.
- The data presented is broad and very limited. Surveys are broad and qualitative. Significance reliance is placed on desk top studies and drive by visits and the professional judgement of EirGrid and its consultants rather than first-hand knowledge of local communities and proper assessment of tower locations.
- Loss, fragmentation of habitats, impacts on species, has not been adequately addresses in the data presented. Assessment of cumulative impacts is absent in any meaningful sense and potential impacts on population dynamics ignored.
- Potential ecological impacts of the proposal cannot be properly assessed in the absence of adequate surveys. The conclusions drawn that the impacts will be mainly low, minor or negligible on sensitive ecological receptors are drawn as a result of poor quality and incomplete baseline ecological surveys, exacerbated by an apparent dependence on hoping to put this right after permission is granted.
- The development contravenes objectives of County Development Plans to protect biodiversity.

Summary of Issues Raised regarding Soils

Adequacy of survey work

- It is important that soil type and structure are critically reviewed at individual pylon locations (especially for peat soils).
- There is insufficient information in the EIS regarding receptors and pathways due to the lack of a walkover survey.
- There is no assessment of the soil or strata structure at each individual tower location (as has been done in NI Consolidated ES).
- In the absence of specific site investigations, there are broad generalisations on the nature of site materials, depth to suitable substrate, level of rock breaking required, amount of groundwater that will need to be pumped and amount of waste material that will be generated etc. There is lack of clarity on the amount of piling that will be required, amount of concrete required for foundations, vehicle movements etc. The broad generalisations are of little value in defining the impact on individual farmers, landowners, residents and businesses.
- Inadequate geological evaluations, do not follow protocols and no site investigation undertaken.
- Information on which the study is based is very limited (largely desk studies). EIS is inadequate in the provision of information to allow for a proper assessment in this regard i.e. fails to have completed proper site investigations. Proposed location of pylons may have to be moved. Absence of site investigations is contrary to standards required by most County Councils in Ireland (BS 5930:1999; BS EN ISO 1997-2L 2007).
- No engineering design of the proposed pylons has been provided and therefore ground loadings and stress distributions cannot be calculated and the requirements for foundation design cannot be assessed. In the absence of this information the application is materially deficient and incomplete.

Technical inadequacies in the EIS

- Technical inadequacies in the EIS, for example not signed off by an accredited geoscientist, no site investigations, figures 7.5 to 7.9 are confused, Appendix 7.1 inadequate (see Appendix 11 of NEPP submission).

Impact of development on, and implications for development of, existing and future mining operations

- EIS fails to be aware of the presence of mining and exploration activities or consider impacts on these e.g. future exploration and development of Tara Mines, exploration and extraction of Monaghan gold deposits (Keady area), sand and gravel reserves (Boycetown area, Moyne-Kilmainham-Muff area).
- The current exploration areas associated with the Navan Mine of New Boliden cover much of the area of the alignment. Current exploration areas cover much of the alignment area. The geophysical exploration methods used would be effectively neutralised in the vicinity of the OHL.
- Risk of ground instability due to underground blasting (Tara mines) and dewatering. Risk of potential ground failure of pylon sites.
- Whilst historical mines are some distance away from the exact line of the towers, the EIS has missed some critical information. Whilst not very likely the possibility exists that the work on the interconnector could encounter previously unknown shafts or adits.
- Risk of mine shaft collapse in the vicinity of the development (collapses occurred on land at Annalogh, in the vicinity of Towers 112 and 113)).
- Concerns regarding structural stability of land around the shaft at Lisdrumgormly Mine (in the vicinity of Tower 110) (most recent collapse, 2012, resulted in the loss of two animals).
- There are mines and shafts in Lemgare rocks, which pose health and safety implications and environmental consequences (lead mine), should the development go ahead and which need to be addressed.
- It is unclear how it is concluded in the EIS that the alignment does not pass through the Lemgare and Tassan mine sites. No mention of underground tunnel system. Absence of survey of mines would be contrary to EU

Directives. No formal study in relation to the mines at Lemgare, Lisdrumgormly and Annalough ever carried out.

- The Board must seriously consider the GSI's Monaghan's County Geological Site Report (Tassan CGS) with regard to management issues identified surrounding the site, in particular the lack of any clear trace of shafts marked on old 1:10,560 sheets which suggest a need for caution regarding visits given the potential for future shaft collapse.
- The properties on which the mines are located have not been exposed to industrial work using heavy machinery over the last century. No development has taken place on potential mine shaft areas. The integrity of the mine shafts have remained intact and filled up with water containing contaminants. Construction of pylon nos. 116 and 117 (Tassan) could potentially break the sealed structure of the old shafts and lead to contamination of the local water supply and related ecological sites.

Proposals for the disposal of surplus material

- Proposals for the disposal of excavated surplus material are unclear.

Impact on sites of geological interest.

- Impact on Galtrim Moraine – Prior to extensive quarrying in the 1960's Galtrim locality was the only esker worldwide where an esker was seen to cross a Moraine. Site is one of the most important areas in the quaternary history of Ireland. Tower 381 is located in Moraine and OHL would appear to pass through it. How will construction traffic affect the Moraine? Construction of Towers 382 and 383 will result in movement of heavy construction equipment over the Moraine. No mitigation measures outlined. EIS does not state how the development will affect this site.

Summary of Issues Raised regarding Water

- The EIS fails to assess the potential impact on the water environment at local level due to difficulties encountered with regard to access to land. There is significant potential to contaminate surface water and to a lesser extent ground water over a very long and wide linear area when all the access routes are considered.
- Countless watercourses and ephemeral channels will either have to be crossed or driven alongside to access the proposed tower sites and these are not detailed at a local or site specific level.
- Mitigation regarding storage of subsoil at each work site with regard to protection of water that could potentially be affected is not detailed.
- Concerns regarding the potential for the release of sediments into watercourses arising from various construction activities including soil stripping and excavation, run-off and erosion from soil stockpiles, dewatering of excavations and felling of forestry.
- The proximity of pylons to sensitive streams and lakes (12m Clady River, 17m Bective river, 20 m Moynalty river, 30m Altmush stream) and 6 m from the River Boyne SAC, increases the risk of direct spillage of concrete to a local watercourse.
- The use of zinc galvanised steel in the construction of the pylons increases the likelihood of environmental discharge into watercourse.

Summary of Issues Raised regarding Air

Noise arising from construction activities

- Concerns regarding noise/vibration due to rock breaking for foundations as rock outcropping occurs over large areas of the proposed alignment.
- Noise impacts during construction.
- Damage to property from vibration.
- No assessment of noise, vibration or dust on residences in immediate proximity to the proposed access routes.

Noise arising from operation of OHL

- Concerns regarding noise during the operational phase, particularly on sensitive and vulnerable receptors, is not addressed by way of mitigation.
- Destruction of the peace and tranquillity of the rural countryside due to noise from OHL.
- Noise impacts associated with operating power lines.
- It is possible to obtain representative noise data from the existing Woodlands lines if appropriate assessments are performed.
- Noise from a 400kV line is clearly audible over long distances and is exacerbated by weather conditions, leading to humming and crackling noises, which can have a significant impact on residences within 200m of a 400 kV OHL.
- The fact that the origin of the noise is from an elevated source means that mitigation is not possible.
- EirGrid must be compliant with any new noise levels that may be introduced.
- Unacceptable level of noise pollution around home. Presently have two sets of ESB wires going past house and there is an ongoing whistling sound.
- Cumulative impact of development (buzzing and Aeolian noise) with M3 and underground mining from the New Boliden Tara ZnPb Mine (towers 319 to 334), with impacts from noise (M3), vibration (blasting from mine), noise (ventilation with attendant fans from mine).

Summary of Issues Raised regarding Landscape and Visual Impacts

Accuracy of photomontages/of visual impact assessment

- County Monaghan/County Cavan
 - The photomontages are unsatisfactory. Visual impacts are played down e.g. legibility of towers, smaller infrastructure in foreground. In particular, for photomontage nos. 3, 4, 5, 6, 9, 10, 19, 21, 23, 31 and 35 and the following:
 - Tower no. 147 in photomontage no. 18.
 - Tower no. 170 in photomontage no. 25
 - Tower no. 170 in photomontage no. 26.
 - Tower nos. 182 and 183 in photomontage 27.
 - The failure to show the 'more permanent localised trimming or removal of taller vegetation within falling distance of the line' masks the true visual impact of the development.
- County Meath
 - Many photomontages are taken at significant distances from the proposed development (average distance is 1,292m) and fail to show a realistic view of it. EirGrid claim to have studied a corridor of 1000m, (500m on each side of the line) photomontages at greater distances than 500m are therefore invalid and irrelevant. This limits the amount of relevant photomontages.
 - Photomontages are misleading, fail to represent any realistic oversight of the proposed development (e.g. have selectively avoided areas of housing development and chosen views of open countryside, thus failing to show the true impact on homes and communities). Including:
 - Photomontage nos. 52, 60 and 73 (with Emlagh windfarm and for no. 60 impact of OHL on village of Bohermeen).
 - Of Ardbraccan (trees scant with gaps and not continuous as depicted).
 - Of Teltown area, taken when trees in bloom. In winter impact would be worse.

- To show the true visual impact of the pylons EirGrid should construct a model pylon in key areas along the route.
- No proper projections, or site specific assessment, to enable a person to properly visualise the effect of the pylon on the landscape.
- No use of LIDAR 3D studies to inform widespread views of pylons. Should be undertaken for tower locations in Teltown (301-312), Brittas, Cruicetown, Rahood and Raffin (262-271).
- In failing to adopt and carry out its visual assessment by reference to the Holford Rules, EirGrid has failed to comply with best practice guidelines in its assessment.

Impacts on visual amenity of residential properties:

- The RVIA fails to accurately demonstrate the true visual impact of the development from the perspective of the host community.
- Detrimental and overbearing impact on residential property and private amenity space due to proximity of OHL.
- Negative impacts on views from residential property.
- The development introduces a significant adverse impact on residential amenities (route passes over existing properties, through curtilages, and/or is immediately adjacent to individual properties and groups of properties). This is not adequately addressed in the EIS.
- Perceived impact on human beings also exists impacting on the enjoyment of the amenities of the residential property by virtue of proximity to infrastructure.
- The line route maps presented in MT004-001 to 072 (Volume 1B) are severely flawed. Buildings considered to be subject to major impact have been measured to nearest point of the building rather than property curtilage.
- In Meath alone there are 162 residences within 200m of the centre point of the line.
- Number of houses within 800m of the line dramatically increases.
- List of extant permissions is not complete.

- Curraghtown House, Moynalty, route of pylons and lines will bisect the views from the front of Curraghtown House to the horizon through 180 degrees, right across front of house.
- Site specific impacts:
 - House located 44.1m from outer conductor of pylon 107.
 - Overbearing impact of pylon 109 on amenity of dwelling.
 - Impact of pylon 120 at 50.98m on house.
 - Pylon 144 will tower over house.
 - Proximity of pylons 149 and 150 to each other and impacts on adjacent dwelling.
 - Pylon 223 will be less than 100m from a habitable house on their land which it is intended to redevelop into a family home in the future.
 - New house constructed on LCT-979C and built since previous EirGrid application was withdrawn not taken into consideration.
 - Impact of towers 236 to 238 on residential amenity of properties by virtue of proximity to towers and lower hanging overhead line (due to topography). Cumulative impacts with existing 220kV line within 1km, 16 pylons within a 1km radius.
 - Impact of towers 259 to 326 as alignment traverses directly alongside a number of residences in a highly scenic area.
 - Impact on views from property (pylon nos. 263 and 264).
 - Proximity of line and pylon 270 will destroy the pleasure of living in a beautiful landscape.
 - Impact on amenity of family houses, Dowdstown House and Mullaghbawn (pylon 290).
 - Impact of towers 306 to 309 Teltown area (sensitive heritage area, with substantial residential development along public road). Due to local landscape topography development may adversely affect the residential outlook from a number of properties.
 - Impact of pylons 317 and 318 on property and on countryside.
 - Impact of tower 321 to 322 as route traverses a narrow area between three sets of residential properties (overbearing impact on residential

amenity, outlook and enjoyment from within property and curtilage of same).

- Impact of towers 332 and 334 Irishtown on residential amenity, outlook and enjoyment, from dwellings and curtilage due to proximity of towers to residential property.
- Impact on amenity and views from dwelling (tower nos. 370-373).
- Impact of towers 383 to 387 on family home (383 to 385 on landholding, others outside).
- Proximity to dwellings of additional circuit on the existing pylons (towers 402-410). There are a number of dwellings in close proximity and the wires will overhand the garden of the Sheridan property close to Pylon 406.

Impact on landscape character:

- County Meath:
 - Impact of development on Landscape Character Area 5 – Lough an Lea Mountain.
 - Impact of development on Landscape Unit E – Highlands of East Cavan.
 - Development will set an undesirable precedent. It will result in negative impacts on a unique drumlin landscape, which cannot be concealed.
 - Development is out of context and out of scale with the small fields that are typical of Co. Monaghan and will destroy the rural countryside and tranquil environment.
 - Scarring of landscape by removal of trees and hedgerows and visual intrusion on public roads.
 - Impact on landscape and visual resources of the wider CMSA. Proposed pylons are the largest and most visible infrastructure development to be constructed in Co. Monaghan, compounded by the drumlin topography. Impacts will not be restricted to those receptors/ areas in close proximity to the development. The line will be crossed and re-crossed by the local population as they go about their daily lives due to the meandering nature of the alignment and roads.

- The development will have a completely unacceptable major adverse impact on the unique drumlin landscape of Monaghan.
- Scale of the towers is wholly inappropriate for this small county.
- County Meath:
 - Large number of pylons to be borne by County Meath.
 - Development will destroy the local landscape.
 - Pylons will be visible for several kilometres.
 - Impact of loss of trees. Zig-zag nature of the route causes a greater impact and more tree loss.
 - Pylons would visually blight a landscape rich in heritage and natural beauty.
 - Impact on rural landscape.
 - Western sky vistas and associated sunsets will be significantly marred by lines and pylons.
 - Degradation and industrialisation of rural landscape (counties of Meath and Cavan offer vistas of unspoiled rural landscapes).
 - Development will have a devastating effect on the Meath landscape.
 - Landscape is poorly suited to the development, undulating, broad expanse – great visibility for long distances. Development will be highly visible at all times, will change the character of the landscape and the quality of views in the area.
 - As guardians of the landscape and heritage of our country for future generations, whilst recognising the need for progress and development, we have a responsibility to future generations to ensure such development is commensurate with maintaining the landscape and heritage we inherited (Aarhus Convention).
 - Impact on rural landscape, by far the greatest threat in 60 years. According to the application, the areas of highest significant adverse visual impact will occur in Co Meath.

Impact on areas of amenity:

- Impact of development on the setting of:
 - Lough Muckno and Environs Area of Primary Amenity Value,

- Mulliyash Mountain,
- Lough Major and Environs Areas of Secondary Amenity Value.
- Impact on Lough an Lea Mountain designated as ‘an area of high landscape beauty’ in the Cavan County Development Plan and which already has a proliferation of telecommunications structures on it.
- Views of the Mourne and Cooley Mountains from individual properties will be impacted by the proposed development.
- Impacts on Lemgare Rocks which is classified as an area of natural beauty and which affords spectacular views over the countryside.

Impact on protected views and prospects and scenic routes:

- County Monaghan/Cavan:
 - Impact on views from Scenic Viewing Point, Lough an Lea (Cavan County Development Plan).
- County Meath:
 - Many of protected views will be irrevocably damaged.
 - Pylon nos. 383-387 will directly impact on protected view no. 44 (Tara-Skryne Hills). Cumulative impact with view of existing high voltage line from Woodlands.

Impact on lakes and environs/river valleys:

- Impact on Muff Lough due to proximity of line and towers (Cavan).
- Line crosses Trim, Athboy and District Angling Association waters at Rathnally (River Boyne).
- Impact on River Boyne, Special Area of Conservation and Bective Abbey.
- Impact of development as it crosses the River Blackwater near Donaghpatrick with its cluster of archaeological monuments and the River Boyne to the west of Bective Bridge and Abbey.

Impact on visual amenity of walking/cycling routes/local roads:

- The power lines will over sail the Monaghan Way and will be visible for miles.
- Views from N2 will be significant (Photomontage 7 & 8).

- Visual intrusion on public roads.
- Impact on Lough an Lea Walking Route.
- Impact on 7 mile cycling route Moynalvy, Derrypatrick, Collegelands, Galtrim, Boycetown, Kiltale and Batterjohn (would rarely lose sight of pylons).
- Line will have significant effects on views from two sections of the Boyne Valley driving route, west of Bective and south of Donaghpatrick.

Impact on visual amenity of settlements:

- Visual impact of pylon No's 119 to 126 on area near Cashel.
- Impact on Muff village (towers 225-8).
- The development introduces significant impact on collective community amenity. This is not adequately addressed in the EIS.
- In Co. Meath, significant impacts on the following settlements/parishes:
 - Dunderry and Robinstown.
 - Bohermeen, impact on skyline.
 - Boyerstown area.
 - Clongil.
 - Cruicetown, Brittas and surrounding area. LIDAR 3D studies should be undertaken to ascertain the impacts of pylons 262 to 271 on Brittas, Cruicetown, Rahood and Raffin.
 - Culmullin.
 - Derrypatrick.
 - Impact on setting of Donaghpatrick Church, setting of Teltown Games.
 - Visual impact on Gibbstown Cemetery.
 - Kilbride village.
 - Impact on Kilmainham. Pylon proposed is on highest flatland in Co. Meath and will be seen from substantial distance with injurious effect on landscape and amenity of lands.
 - Impact of development on Moynalty, a beautiful scenic village in North Co. Meath famous for its scenery and heritage, winner of Tidy Towns competition in 2013 and thousands attending the Steam Threshing Event. With backdrop of pylons, beauty would be marred.

- Impact on Nobber (and protection afforded to Nobber Bridge, Motte ecclesiastical complex (St. John's Church of Ireland site) in County Development Plan). Impact on topography and drumlin landscape around Nobber and landscaped parkland at Brittas Demesne.
- Impact on views from Rataine cemetery.
- Impact on Teltown. Visual impact of 174 pylons on Teltown/Donaghpatrick area. LIDAR 3D studies should be undertaken to ascertain the impacts of pylons 301 to 312 on Teltown ZAA
- Large number of pylons in Wilkinstown/Nobber/Kilmainhamwood.

Impact on demesne landscapes:

- Impact of development on Tully House and Shantonagh House, Co. Monaghan, listed in NIAH garden survey (including Reduff Mill and Harrison's Mill).
- Impact of development on the following Historic Designed Landscapes:
 - Ardbraccan
 - Galtrim House and Demesne
 - Churchtown
 - Philpotstown (Dunderry Park)
 - Teltown House and Demesne.
 - Rahood.
 - Mountainstown House and Demesne.
 - Dowdstown.
 - Brittas demesne.
 - Whitewood demesne. Observers refer to precedent set by ABP to refuse permission for a six turbine windfarm on the grounds that it would unduly interfere with the views from Whitewood House.
 - Culmullin.
 - Cruicetown.

Impact on trees and hedgerows:

- Contribute to landscape character of the County.

- Mature trees and hedgerows will be removed at towers 112, 140, 143 and 202 due to the positioning of towers.
- There is no justification in the EIS for the proposed width of clearance corridor of up to 74m (falling distance of most trees would be 8-14m).
- Insufficient information on field boundary hedgerow removal to facilitate access during construction.
- Compensatory habitats should be provided at suitable locations.
- Construction phase will be hugely destructive of the countryside (loss of hedgerows, trees and excavation of soil).

Cumulative effect of development:

- The EIS fails to adequately address cumulative impacts in a number of locations including Ervey (proposed development including towers 233 to 245 with existing 10 pylons along the existing 220kV line from Arva to Louth and proposed windfarm development at Teevurcher wind farm with turbines proposed within 2.4 km of the proposed OHL).
- The new pylons will add to the existing ones resulting in a large quantity of pylons in a small area. A future substation is planned for the area as well as various connections from wind farms and biomass generators.
- Not all existing transmission lines are shown on EirGrid maps.
- The Joint Environmental Report does not adequately address the cumulative effects, in particular cumulative effects with regard to other planned major energy infrastructure development of a cross border nature.
- The existing 110kV Lisdrum-Louth line already crosses LCT-064, the land on which it is proposed to located pylon 130. By accommodating existing development, observer has already served his community.
- With existing 220kV OHL (Kilmessen area).
- With existing high voltage lines Woodland area.
- With Emlagh and Maighne windfarm (industrialise the landscape, change its character, destroy much of the riches of the area), including on the Hill of Tara.

- With existing power line (Ballyshannon to Woodland) and large radio mast (Radio Tara) in Summerhill area. Addition of pylons will have a very negative impact on views and prospects throughout parish and county.
- Cumulative impact of proposed development and Emlagh wind farm
- Cumulative impact of development with existing pylons 402 to 410 in Hayestown area.
- Cumulative impact of the development on residential amenity along the entire route corridor.

Conflict with policy:

- The development is in conflict with the landscape protection policies contained in the Co. Monaghan Development plan. An Bord Pleanála is requested to give full weight to the word 'unique' used to describe the drumlin landscape of Monaghan County Development Plan.
- Height of the structures and how this can be reconciled with the planning restrictions imposed on the siting of housing and farm buildings. Height of houses etc. controlled and landscaping plans required to screen development.
- Development is contrary to the planning guidelines for Co. Monaghan
- Development is in contravention of all the aims the European Landscape Convention. Having regard to the requirements European Landscape Convention and Heritage Council's proposal to Meath County Council that Tara be made a Landscape Conservation Area, the Board should adopt a precautionary approach towards the assessment of the proposed development.
- Conflict with National Landscape Strategy for Ireland 2015 to 2025.
- Development, by virtue of its scale, extent and impact, should be considered in a national context within the development of a National Landscape Character Assessment.
- Conflict with Meath County Development Plan 2013-2019 (Rural Design Guide).
- In the absence of any material planning reason confirming that no alternative overhead route exists, development would be contrary to Meath County Development Plan Policy EC POL 16 and Policy EC POL 19. There is no

strategic or national argument that justifies the development in its current form.

Summary of Issues Raised regarding Material Assets (General)

Impacts on Businesses/Services

- Impacts on Lough Egish Food Park, which enables many food based commercial enterprises to prosper as well as presenting significant employment in the immediate environs of Lough Egish and surrounding areas. It cannot afford negative health and environmental issues which may threaten its existence.
- A significant and important area has been overlooked in this section of the EIS and this relates to the potential threat to the Emergency Aeromedical Service conducted by the Air Corps.
- Impact of development on private wind turbine.

Utility Infrastructure

- The proposed development will dramatically increase the amount of pylons in County Meath.
- 59 telecoms lines will require undergrounding where they cross the proposed development, as will 11 electricity distribution lines.

Waste

- Excavated material from tower foundations will be c.14,000 m², which in a worst case scenario will need to be land filled.
- In the absence of specific site investigations, there are broad generalisations on the amount of waste material that will be generated etc.
- Timber waste would also be generated.

Aviation/Hot Air Ballooning

- Development will adversely impact on licenced and unlicensed airfields (Trim, Adamstown and Ballyboy, to a lesser extent).
- Development will have a major adverse effect on two tourism related businesses in close proximity to the line, Trim Airfield (refer to Appendix 4 and 5 of NEPP submission) and the Irish Balloon Flights.

- Impact on light aircraft in particular in emergency conditions (north south orientation of line versus prevailing wind), if engine fails best to fly into wind and land.
- Possible dangers of pylons in flight path of Trim airfield.
- Hot air balloons often land in Culmullen. Will not be possible if development goes ahead.
- Meath is the hot air ballooning capital of Ireland. Proposed lines would add a very serious risk to ballooning. Ireland has a 100% safety record but internationally most deaths and serious injuries occur with contact being made with this type of line.
- OHL is due east of a launch site. Route will reduce potential for landing sites due to scale of development, prevailing wind (western) and will present a hazard to pilots.
- Negative impact on hot air ballooning community.

Existing telecommunications

- Development (tower 249) passes within 250m of a radio station (station licence E15JS). EMF will cause interference with radio station. Observer is protected under licence from sources of interference. Requests that the Board liaise with Comreg.

Summary of Issues Raised regarding Material Assets (Traffic)

Arrangements for access

- Some entrances will have to be widened to ensure adequate sightlines are provided and this is not addressed in the EIS.
- The impact on local roads and private access tracks has not been properly evaluated in the EIS. Many are narrow and incapable of accommodating heavy vehicles. There are concerns regarding the collapse of, or serious structural damage to bridges and culverts.
- Access lane width and road width should have been measured to ensure that construction vehicles can access the land and to determine if hedgerows need to be removed.
- In the absence of specific site investigations, there are broad generalisations on the amount of waste likely to be generated, piling that will be required, amount of concrete required for foundations and vehicle movements arising.
- Local roads and haul routes identified in the EIS are incapable of accommodating the heavy traffic that will be associated with the development. Many are unfit for purpose and some are located on bog (192). To gain access it will be necessary to knock down walls, remove hedges etc.
- The access tracks to the pylon sites are not designed for the type of machinery that will be used during construction. The issue of widening these lanes and removing hedgerows has not been fully investigated or fully addressed. It has not been demonstrated that adequate sight visibility splays will be attainable at site entrances.
- No costings have been provided to indicate how damage to these roads will be repaired.
- Impact of construction traffic on tracks close to house.
- Safety risks, particularly for children, associated with use of private tracks by large machinery.
- There will be impacts on hedgerows and drainage at road edges and the removal of hedgerows would require permission from landowners which would not be forthcoming given the objection to the development.

- Use of access route to dwelling and farm buildings (LCT-056A) will result in demolition of farm buildings.
- Risk posed to spring well and pump that lie in the path of construction access to pylon.
- Access to Pylon 167 is along a track flanked by an old house, a farm buildings/shed etc.
- Impacts on day to day activity and loss of privacy (residential buildings).
- Destruction of land/fields, hedgerows, trees, walls etc. by access tracks.
- No mention of repairing roads and verges damaged by construction traffic.
- A significant increase in traffic especially HGVs will result from the proposed development.
- Volumes of construction traffic, haulage routes and access locations have not been identified in an appropriate manner and therefore the likely significant effects have not been properly assessed.
- It is likely that damage will be caused to haulage routes by concrete and other site deliveries. Little information is provided on this.
- Many of the access routes will be impossible to use due to their nature. EirGrid do not appear to have visited the areas concerned and have not considered the width or accesses and gateways and the weight limits on farm bridges. The access routes cannot be widened post approval of the application.

Traffic Management.

- There is no documentation on traffic management during construction.
- An adequate construction management plan has not been developed and it is not possible therefore to judge the likely significant effects of the development.

Rights of Way Issues

- Permanent rights of way will be required over property. Land owners are unwilling to grant third party access to lands.

Site Specific Issues

- The location of pylons on land shows a lack of local knowledge regarding access, rights of way and local lanes, which are clearly shown on OS maps.
- L-3510-0 identified as a haul route is completely inadequate. The EIS does not address the particular dangers presented by construction traffic on this road.
- Transmission line runs across a right of way that provides access to off-road fields. Tower 224 (LCT 222) is proposed near the entrance to the field that is accessed by the right of way.
- Cornasassanagh Lane is unfit for purpose and should be considered when implementing construction and traffic management strategy.
- The L7200 is a narrow route with dangerous bends and unsuitable for construction traffic.
- Unclear why Cornanure Road, which is wider, is not being used instead of access track adjacent to Ryan property at Rausker.
- Location of access track relative to LCT-081.
- Access to Pylon 139 is in separate ownership. There is no gap so a large opening will be created. The route will bisect fields with no attempt to follow the boundary hedge. It is not understood why the Cornaure road, which provides more direct access is not used
- Narrow laneway to be used for access to pylon 128 and 129.
- Access to proposed laneway to access pylon 104 will be impossible.
- Access to pylon 167 is along a track flanked by an old house and farm buildings/shed.
- Impacts on roots of oak trees in private lawn adjacent to access to Pylons 170 and 171.

Summary of Issues Raised regarding Cultural Heritage

- The proposal will devalue heritage assets in the locality.
- The Loughanleagh & Muff Heritage Trust Ltd objects to the proposal on the grounds that it will damage heritage tourism and blight the local landscape.
- The interconnector will cross the mountain road at Muff crossroads and enter an area containing significant historical and cultural features including Muff Castle, where there is reputedly a souterrain and the site of the site of 'Muff Fair' where the annual fair is held that dates back to 1608 and is a traditional and extremely important event. At least 7 pylons will be visible from the site and the cables will cross 140m from the monument.
- The development will be visible from Lough an Leagh Mountain top, which contains three cairns registered as protected by Duchas. A new walk way and part of a new heritage centre has been constructed. There is also a Mass rock and a 'Healing Lake' in the vicinity. The proposed interconnector will have a devastating effect on the entire archaeological, cultural, religious, heritage and community life of this area.
- The foothills of Lough an Leagh mountain area are a very delicate environment and the heritage features include Cabra Castle, Dun Na Ri Forest Park and Moybologue Cemetery. This environment was not taken into account by EirGrid.
- The alignment will have a huge visual impact on Lennan Portal Tomb being c 200m away. Towers 33 and 34 will be at distance of 220 and 250 m respectively.
- Agree with the assessment by Monaghan Co Council which states that although the route will be 210m to the east, there will be a significant and permanent impact on the monument.
- Concur with Monaghan Co Council that the impact on the monuments and their settings have not been considered as no imagery suitable for assessing the impact on the monuments has been provided and the cumulative impact between sites has not been addressed. Heritage
- Visual impact on Lemgare Rocks, a site of national heritage importance and recorded monuments in the vicinity including Beagh-Crannog in Bock's Lough, Ring-fort and Enclosure in Tullyglass, Earthworks in Tooa, Barrow and mills in Readuff and Ring-fort in Aghmarker.

- The proposed path of the OHL bisects the natural view between two ringforts still in existence, one at Ardagh to the north and Raferagh to the south. The line of sight between the monuments will be blocked by the development.
- An 'earthworks' in Corvally which is only a few hundred feet from the power lines has recently been discovered and is not mentioned in the application. There is also a children's burial ground and dugout canoe find on LCT-170. These significant and unique local heritage features do not seem to be considered in the EIS.
- Impacts on setting of Lennan monument to the east of pylon 134.
- Negative impacts on SMR No. MO014-022 Megalithic Court Tomb located 130m west of Tower 107.
- Towers 170 & 171 will be visible in the environs of Lough Egish Church, a Protected Structure.
- There is a high risk that the perimeter wall of Latnakelly fort, a protected structure will be damaged by heavy traffic on the laneway on the laneway to access Pylon No's 113/114.
- The megalithic tomb located in Croaghan will be within viewing distance of the proposed line.
- The route passes almost directly over a ringfort (SMR No MO 014-021001 and MO014-021002).
- The proposed development is in close proximity to a range of monuments that have remained intact for centuries. The line route from Pylon 126-103 could and should have followed a straight line trajectory as outlined on Page 11 thereby avoiding all the archaeological sites and monuments mentioned in the text.
- The EIS has failed to capture or record more recent events of historical significance which have contributed to community life. Murphy's Crossroads in Tassan has been a focal point for many generations. The 'Kabin' which has been used to celebrate the success of local people has been omitted from the maps. The powerlines cross over the area and will no doubt put an end to this long tradition.
- According to EIS Harrison's Mill could not be located and is not a recorded monument. The mill is in Readuff and is documented as 'Flax mill complex

consisting of five bay two-storey central building with water wheel' –Regional Status Number 41402706.

- Given that access was only achieved to c 20% of the sites and the length of the alignment, the assessment of sites of archaeological, architectural heritage and cultural heritage is inadequate.
- Despite recognising that particular areas of social, cultural and historic interest are threatened by the development which include Bective Abbey, Donaghpatrick, Teltown Zone of Archaeological Amenity (and which should include Brittas House, where the line crosses the driveway as well as views to/from Whitewood House), it still wishes to destroy such locations with the proposed development.
- EirGrid accepts that there will be a permanent negative impact upon a number of listed demesnes and listed buildings. Of these Bective, is a listed and protected heritage site whose setting would be permanently disfigured by the proposed development.
- A recent application for a windfarm (PL17.244357) was refused on the grounds that it would unduly interfere with the views from Whitewood House, a protected structure, and due to the failure to consider the alternatives.
- To allow the development to transgress Whitewood in the manner proposed would be entirely inconsistent with the Board's decision. Pylons 257,258 and 259 would be in a similar position to the proposed windfarm and would interfere with the same protected views.
- With reference to architectural features, there are 92 structures listed in the RPS and NIAH for Co Meath and Co Cavan within 2km of the line. In Meath the line passes 600m to the east of Ardbraccan demesne, c 2.8km from Dunsany Castle and approximately 4.1km from Headford Demesne ACA's. Based on the NIAH historic garden survey, there are 51 demesne landscapes and historic gardens within 2km of the line, some of which lie in close proximity or will be traversed by the line.
- There are 325 recorded monuments within 2km distance of the centreline of the interconnector. Bective Cistercian Abbey is closest and located 920 m to the east of the centreline. There are 38 religious sites within 2km of the line.
- Teltown and Donaghpatrick are located in a part of the country that is rich in archaeology and history and in an unspoilt landscape. It is accepted by EirGrid

that Teltown ZAA is an area of high archaeological potential and that there is a risk that archaeological deposits associated with seven archaeological monuments could be directly physically impacted upon during construction of the pylons (Appendix 16 & 17).

- The development passes through the important cultural heritage Gaeltacht area of Baile Ghib.
- Impact of the development on the rich heritage of the area (County Meath), Hill of Tara, River Boyne/Boyne Valley, historic town of Trim, Bective Abbey.
- Impact on Derrypatrick Church and graveyard (last erected to be erected by St. Patrick).
- Impact on Rathnally House.
- Development would undermine Meath's unique status as the heritage capital of Ireland.
- Impact on Bloomsbury Demesne.
- Impact on Robinstown area.
- Impact on Brittas, Cruicetown, Rahood and Raffin area adjacent to Nobber.
- Impact on heritage of the parish of Clongil and Kilshine (includes the townlands of Clongil, Fletcherstown, Glebe, Dowdstown, Mountainstown and Knightstown). Historic area, settled since the earliest times, numerous Protected Structures and National Monuments.
- Development would seriously compromise Brittas House (Protected Structure). Impact on lands at Brittas, Nobber which is part of a farmed historical and archaeological landscape and has remained unspoilt for centuries.
- Impact on Teltown House and area.

Summary of Issues Raised regarding Cumulative Impacts

- The new pylons will add to the existing ones resulting in a large quantity of pylons in a small area. A future substation is planned for the area as well as various connections from windfarms and biomass generators.
- Not all existing transmission lines are shown on EirGrid maps.
- The Joint Environmental Report does not adequately address the cumulative effects, in particular cumulative effects with regard to other planned major energy infrastructure development of a cross border nature.
- The cumulative costs in terms of destruction of scenic drumlin landscape, negative visual impact, environmental and ecological destruction of protected species and habitats, increased risk to health and safety, decimation of house and land values along the alignment are but a few factors which substantially outweigh the benefits of the proposed development
- The EIS fails to adequately address cumulative impacts in a number of locations including Ervey, Emlagh, Boyerstown and Woodlands.
- The area around Ervey will be particularly badly affected with some 13 proposed pylons (No's 233-245) being added to the existing 10 pylons along the existing 220kV line from Arva to Louth. At least 23 turbines would be visible from many locations in this area. Planning permission has also been granted for a wind farm in 2013 at Teevurcher with turbines proposed within 2.4 km of the proposed OHL.
- A section of the Emlagh wind farm will run directly alongside the proposed line and the landscape and visual impact of the development in conjunction with the wind farm must be considered and assessed.
- It is relevant to note that in December 2014 a decision by An Bord Pleanála was quashed on the grounds of cumulative impact effects where Mr Justice Peart rejected arguments made by the Bord and Framore Ltd that the windfarm and the grid connection were separate projects.
- The Hayestown-Bogganstown area lies along the existing single circuit 400 kV line from Moneypoint into Woodlands. The additional circuit will be placed on the existing pylons (420-410). There are a number of dwellings in close

proximity and the wires will overhand the garden of the Sheridan property close to Pylon 406.

- The area between pylons 319-334 is already constrained by two major projects, the N3(M) motor and underground mining from the New Boliden Tara Mine. There is significant noise associated with the N3 and vibration impacts associated with the underground mine. The development of two vertical ventilation raises with attendant fans will add to the overall noise spectrum in the area. Should the proposed development proceed, it will generate an additional noise source associated with electrical discharge buzzing and Aeolian noise in the pylons and conductors from the prevailing wind direction. This will create a substantial cumulative impact.
- Cumulative effect of the Emlagh Bog Wind Farm, planning permission granted for the incinerator at Nobber, the existing College Protein Plant, the NSI and the Thornton Recycling Plant have a negative impact on the Nobber environment and surrounding area.

Summary of Issues Raised regarding Transboundary Impacts

- Transboundary impacts arising from construction close to the Border.