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### APPENDIX A

### Appendix A of the Final Re-evaluation Report

Review of Issues Raised in Written Submissions to An Bord Pleanála and Presentations at the Oral Hearing in respect of the Previous Application for Approval (An Bord Pleanála Reference VA0006) 

North-South 400kV Interconnection Development

# Final Re-evaluation Report APPENDIX A

Review of Issues Raised in Written Submissions to An Bord Pleanála and Presentations at the Oral Hearing in respect of the Previous Application for Approval (An Bord Pleanála Reference VA0006)



Part Funded by the EU-TEN-E Initiative







#### 1.0 Introduction

A previous application for planning approval for the North-South 400 kV Interconnection Development (An Bord Pleanála Reference VA0006) was lodged on 18<sup>th</sup> December 2009. The details of application were on public display during the period January – March 2010 (for a 10 week period) at the offices of An Bord Pleanála, the offices of the relevant County Councils (Meath, Cavan and Monaghan), at the Project offices at Navan and Carrickmacross, and on a dedicated web page.

Stakeholders, the general public and other interested parties had until the 12<sup>th</sup> March 2010 to make submissions / observations on:-

- The implications of the proposed development on the proper planning and sustainable development of the area; and
- The likely effects on the environment of the proposed development if carried out.

In addition, as part of the statutory consultation process, a number of Prescribed Bodies made observations on the content of the application for approval (including the Environmental Impact Statement (EIS)) to An Bord Pleanála.

In total, approximately 940 written submissions or observations were received in respect of the application.

In May 2010, An Bord Pleanála commenced an Oral Hearing in respect of the proposed development. Both Prescribed Bodies and interested parties (to include new parties to the application) had the opportunity to make an oral submission to the Hearing.

#### 2.0 Approach to Submissions

A copy of every submission received by An Bord Pleanála was issued to EirGrid. In order to ensure that all of the submissions were considered by the relevant specialist project team member, an initial review process was conducted.

This initial review included the identification of the main issues in each submission under a number of key specialist topic areas. These topic areas related to various aspects of the proposed development and the contents of its application package (including environmental topics included in the EIS). These specialist topic areas are identified on **Table A1**.

The purpose of the review was not an end in itself but rather highlighted to the relevant specialist project team member when an issue relevant to their particular specialism was raised and to direct their attention to the need to review the submission in detail.

The output of the initial review process for each submission is detailed in **Table A2** located at the back of this Appendix.

Topics	5
1	Air Noise and Vibration
2	Application Related
3	Consideration of Alternatives
4	Construction
5	Consultation
6	Cultural Heritage
7	Flora, Fauna and Fisheries
8	Health
9	Landscape and Visual Impact
10	Legal
11	Material Assets
12	Need
13	Operational
14	Planning Context
15	Property
16	Traffic
17	Soils, Water and Geology

#### Table A1 Topic Headings Used to Review Submissions

An explanatory note on these topics and the types of issues raised is set out below.

 Air, Noise and Vibration – The issues assigned to this topic related to Chapter 10 and 11 of Volume 2A and 2B of the 2009 Environmental Impact Statement. They included potential impacts arising from noise associated with the proposed pylons, transmission line and substation.

- **Application Related** The issues assigned to this topic related to various aspects of the application package including *inter alia* the costs of purchasing the application, queries relating to mapping, photomontages etc.
- Consideration of Alternatives The issues assigned to this topic primarily related to Chapter 4 and 5 of Volume 1 of the 2009 Environmental Impact Statement. They included issues relating to undergrounding as an alternative to OHL, route alternatives (including disused railbed and the M3), substation site alternatives, other technology options and tower design options.
- Construction The issues assigned to this topic related to Chapter 4 of Volume 2A and 2B of the 2009 Environmental Impact Statement and included issues such as construction techniques and safety considerations.
- Consultation The issues assigned to this topic primarily related to Chapter 3 of Volume 1 of the 2009 Environmental Impact Statement. The issues included observations relating to consultation with the public, stakeholders, landowners and Prescribed Bodies.
- Cultural Heritage The issues assigned to this topic related to Chapter 14 of Volume 2A and 2B of the 2009 Environmental Impact Statement. They included potential impacts relating to archaeology, architectural heritage, demesnes etc.
- Flora, Fauna and Fisheries The issues assigned to this topic related to Chapter 7 of Volume 2A and 2B of the 2009 Environmental Impact Statement. They included potential impacts relating to wildlife, flora, fauna (including Whooper Swans), trees, fisheries, etc.
- Health Effects The issues assigned to this topic related to Chapter 6 of Volume 2A and 2B of the 2009 Environmental Impact Statement. They included potential impacts relating to health generally and EMF in particular.
- Landscape and Visual Impact The issues assigned to this topic related to Chapter 12 of Volume 2A and 2B of the 2009 Environmental Impact Statement. They included potential impacts relating to the visual impact of the proposed pylons, transmission line and substation. It also included observations in respect of particular landscape types (e.g. local bogs, forestry etc.).

- Legal The issues assigned to this topic included all observations relating to access rights for construction, maintenance and survey work, compensation, and owners' rights. It also considered observations relating to Strategic Infrastructure and EIA legislation (including *inter alia* Appropriate Assessment, the consideration of alternatives, transboundary and micrositing).
- Material Assets The issues assigned to this topic related to Chapter 5 of Volume 2A and 2B of the 2009 Environmental Impact Statement. They included potential impacts relating to the impact of the proposed development on farming practices, the community, tourism and livelihoods.
- Need The issues assigned to this topic related to Chapter 2 of Volume 1 of the 2009 Environmental Impact Statement. The issues included demand and policy provisions relating to the proposed development.
- **Operational** Issues assigned to this topic covered those relating to operational issues.
- Planning Context The issues assigned to this topic related to Chapter 1 and 2 of Volume 1 of the 2009 Environmental Impact Statement and the Planning Context Report submitted with the planning application. The issues included observations relating to national, regional, and local development plan policy.
- **Property** The issues assigned to this topic related to Chapter 1 and 2 of Volume 1 of the 2009 Environmental Impact Statement and the Planning Context Report submitted with the planning application.
- **Traffic** The issues assigned to this topic related to Chapter 13 of Volume 2A and 2B of the 2009 Environmental Impact Statement. They included potential impacts relating to the impact of the proposed development on the road network, access points etc.
- Soils, Geology and Water The issues assigned to this topic related to Chapter 8 and 9 of Volume 2A and 2B of the 2009 Environmental Impact Statement. They included potential impacts relating to the impact of the proposed development on geology, soils, rivers and lakes.

#### 3.0 Response to Submissions

In drafting witness statements for the Oral Hearing, each specialist project team member had regard to the issues raised in the submissions. Where the submission raised a very specific issue / query which may not already have been addressed in the application documentation this was specifically responded to.

Accordingly, the primary means of responding to all issues raised in the written submissions was during the previous application for planning approval and specifically the witness statements made by EirGrid and its Project Team to the Oral Hearing.

The primary means of responding to any new issues raised by Prescribed Bodies and interested parties (to include new parties) that made an oral submission to the Hearing, was through cross examination (prior to the adjournment of the Oral Hearing).

In June 2010, the EirGrid application was required to be withdrawn due to the discovery of an inadvertent error in the public notice. As such, the application for approval was not determined by An Bord Pleanála. Accordingly, the Oral Hearing was never completed including cross examination.

## 4.0 Submissions on the Previous Application for Approval and the Re-evaluation Report

As set out in Chapter 1 of the Final Re-evaluation Report, EirGrid is undertaking "a comprehensive review of the previous application for planning approval" including but not restricted to "the subject matter of that planning application, the EIS and other technical and environmental studies accompanying the application, alternatives considered in that application, and third party and other submissions made to An Bord Pleanála in respect of that application."

As part of the re-evaluation process, therefore, the project team has considered those issues that arose in all the written and oral submissions made on the previous application. Many of these issues related to the details of the previous application whereas the scope of the re-evaluation process is to ensure that there is an understanding of, and confidence in, EirGrid's conclusions in respect of comparative evaluation of route corridor options and identification of the indicative line route based on updated constraints and other information.

In this regard, the re-evaluation stage in the project comprises a process of re-evaluation of the overall project, and does not concern the detailed routing or design of the proposed OHL and associated development. In developing its proposal in subsequent phases of design and environmental assessment, EirGrid and its consultants will consider the potential impact of the development on *inter alia* environmental topics. This will be addressed in the EIS that will accompany a future application for approval.

Accordingly, during the re-evaluation process those issues identified as particularly relevant to the scope of the re-evaluation process were considered. The issues identified tended to come under the Topic Headings identified in **Table A3**.

Торіс	: Headings
1	Consideration of Alternatives
2	Cultural Heritage
3	Flora Fauna and Fisheries
4	Landscape and Visual Impact
5	Need
6	Landscape and Visual Impact
7	Soils, Water and Geology
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## Table A3 Headings / Sub Headings Particularly Relevant for the Re-evaluation Process

The rationale why some of the issues raised by observers during the 2009 application were not considered relevant for detailed consideration in the re-evaluation stage (and specifically route corridor and indicative line route re-evaluation) is included in Chapter 7 of the Final Re-evaluation Report and includes *inter alia* issues / criteria that would be generally 'Neutral' for the purpose of the comparative evaluation of route corridor options, in that the results would be broadly the same for every route corridor option in the overall study area. These issues include those for which it is reasonably assumed that mitigation measures can and will be implemented and which will therefore be the same or similar for each identified corridor (e.g., safety and construction / operational issues) and those issues more appropriately addressed during subsequent detailed route design, preparation of EIS and planning stages.

However, it must be noted that <u>all issues</u> raised in the submissions on the previous application will continue to be considered as the project progresses towards a new application.

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## APPENDIX B

Community Update Brochure (May 2011)



# North-South 400 kV Interconnection Development Community Update May 2011





Part Funded by the EU TEN–E Initiative

EirGrid Commences Non Statutory Consultation





## **The Re-Evaluation Process**

## **Background and Context**

EirGrid and Northern Ireland Electricity (NIE) are jointly planning a cross-border project to facilitate sharing of electricity and to promote better competition. In addition EirGrid is seeking to improve the security of electricity supply throughout the north-east area.

EirGrid submitted an application to An Bord Pleanála (ABP) for the section of this project in the Republic of Ireland at the end of 2009 however that application was withdrawn in June 2010.

Since then, EirGrid has entered a process of re-evaluation in which the project has been thoroughly re-examined. This includes issues raised by stakeholders and the general public during the previous application process.

## What is Happening Now?

EirGrid has now published a Preliminary Re-Evaluation Report and is engaging in a six week period of non-statutory consultation providing all interested stakeholders with an opportunity to give feedback on the indicative project solution, before submitting a fresh application for planning approval to An Bord Pleanála.

# EirGrid would like to hear your views

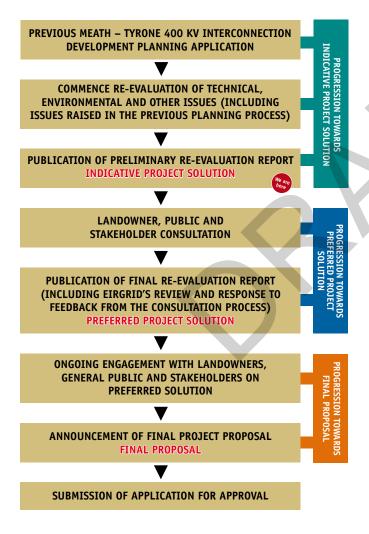
Please submit your views on the report or development to the Project Team by 17th June 2011. Consultation questions and a feedback form can be found in this brochure. The Preliminary Re-evaluation Report is available on **www.eirgrid.com** or by contacting the Project Team.





## Towards a New Planning Application

The diagram below illustrates the current re-evaluation process that will ultimately lead to the submission of a new application to ABP.



## **Project Roadmap Definitions**

### **Indicative Project Solution**

This project has a history of almost four years and a significant amount of research and public consultation has been carried out. This allows EirGrid to bring forward an indicative project solution which, unlike other projects, has the significant benefit of the information gathered and learnings from the previous planning process.

## Landowner, Public and other Stakeholder Consultation

EirGrid is holding a six week consultation, seeking feedback on the conclusions contained in the Preliminary Re-Evaluation Report, as well as any new insights on the project that interested stakeholders may have. This is an opportunity to make submissions or observations to EirGrid regarding the nature and location of the project.

#### **Preferred Project Solution**

EirGrid will examine the feedback from the Landowner, Public and Stakeholder consultation and make a decision on whether to adopt (with any modifications) the 'Indicative Project Solution' as the 'Preferred' solution, or whether new information has come to light that requires additional technical and environmental evaluation.

North-South 400 kV Interconnection Development Community Update May 2011

#### ...definitions continued

**Ongoing Engagement with Affected Landowners, General Public and Other Stakeholders on Preferred Project Solution** The terms of reference for the engagement with stakeholders will focus on the refinement of the 'Preferred' solution having regard to localised constraints and other criteria.

#### **Final Proposal**

Following all of the environmental studies and stakeholder engagement, EirGrid will publish the final project proposal, which will form the basis for a new application to An Bord Pleanála.

## **Report Findings**

The Preliminary Re-evaluation Report documents the reassessment of high level issues that form the basis of this project. The report contains the following preliminary findings:

**1.** There is still a clear and immediate need for enhanced interconnection with Northern Ireland. This will provide significant benefits for the people of Ireland:

- Improve competition in the electricity market;
- Improve security of supply; and
- Support the development of renewable power generation.

**2.** There remains a need to reinforce the transmission network in the north-east area of the Republic of Ireland.

**3.** The best technological solution for this project is a 400 kV Overhead Line (OHL), running from the existing Woodland Substation in Meath to the proposed Turleenan Substation in Tyrone.

**4.** Undergrounding of short sections of the line is feasible but no new areas that would warrant additional undergrounding have been identified to date.

**5.** The previously planned intermediate substation (in the vicinity of Kingscourt), is not now expected to be required within the next decade. This will therefore be subject to a separate application to An Bord Pleanála when that need arises.

**6.** Each of the previously identified route corridors remains viable as a routing option for the proposed Development.

**7.** Route 3B in the Meath Study Area and Route A in the Cavan-Monaghan Study Area remain the corridors that strike the best balance between all criteria. The indicative line route is broadly similar to the line proposed in the previous application (see map insert).





## **Project Evolution**

What changes have been made to the project as a result of the Preliminary Re-evaluation Process?

The Preliminary Re-evaluation Report has reconfirmed most of the original conclusions for this project. However, some modifications have been made, which include:

- Removal of the previously proposed Moyhill Substation near Kingscourt and certain modifications associated with this;
- Local modification to avoid new houses.

## We Welcome Your Feedback

EirGrid is seeking feedback from all interested stakeholders on the findings of the Preliminary Re-evaluation Report, which is available at www.eirgrid.com and the project information centres (See details of location at the back of this brochure).

If you have any feedback on the findings in this report, EirGrid would like to hear your views. EirGrid is keen to learn of any new insights on aspects of the project before a new application for planning approval is submitted. Submissions will be recorded and considered by the project team as the project moves forward. The assessment and response to feedback received as part of this process will be published with the Final Re-evaluation Report.

We would greatly appreciate your comments and views on the following key questions:

**1.** Has EirGrid considered all relevant criteria in determining that the optimum technical solution for this project is an overhead line? If not, what additional information should EirGrid consider or what viable, cost-effective, technically appropriate and environmentallysensitive alternative would you suggest?

**2.** Have all environmental criteria been appropriately considered? Is there anything else that you think should be looked at?

**3.** Are there any other key issues that EirGrid should consider before submitting a new application to ABP.

There is a tear-off feedback form on the last page of this brochure. You can also provide feedback through email, on the phone line, or by meeting with a member of the project team.

A six week non-statutory consultation process will now commence; please submit your views to the Project Team by 17th June 2011.

North-South 400 kV Interconnection Development Community Update May 2011

## **Contact Us**

#### Email: northsouth@eirgrid.com

Phone: Lo-Call 1890 25 26 90 (9:00 am to 5:00 pm, Monday to Friday)

Visit:

Navan Information Centre 10a Kennedy House, Kennedy Road, Navan, Co. Meath (Please note our new address) Open Tuesdays, 1:00 – 7:00 pm or by appointment

### **Carrickmacross Information Centre**

Carrickmacross Workhouse, Shercock Road, Carrickmacross, Co. Monaghan Open Wednesdays, 1:00 – 7:00 pm or by appointment

Web: www.eirgrid.com

Post: **C/O EirGrid NS Project Manager** West Pier Business Campus, Dún Laoghaire, Co. Dublin, Ireland



## Feedback

Email

Name			
Address			
Telephone			

Return to: **C/O EirGrid NS Project Manager**, West Pier Business Campus, Dún Laoghaire, Co. Dublin, Ireland

# What are your views?





Email: northsouth@eirgrid.com

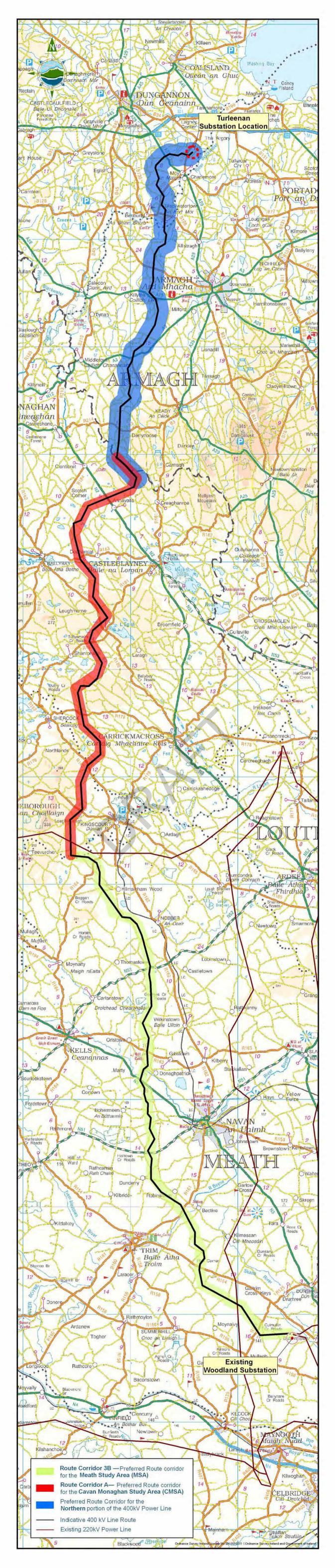
Phone: **Lo-Call 1890 25 26 90** (9:00 am to 5:00 pm, Monday to Friday)







www.eirgrid.com



## APPENDIX C

## Appendix B of the Final Re-evaluation Report

Response to submissions and other engagement arising during the Re-evaluation Report



North-South 400kV Interconnection Development

# Final Re-evaluation Report APPENDIX B

Response to Submissions and Other Engagement arising during the Re-evaluation Process



Part Funded by the EU-TEN-E Initiative







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## 1 THE RE-EVALUATION PROCESS AND CONSULTATION

## 1.1 THE PRELIMINARY RE-EVALUATION REPORT

Since the withdrawal of the previous application in respect of the North-South 400 kV Interconnection Development Project in July 2010, EirGrid has commenced the process of preparing a new application for the proposed transmission infrastructure development by means of a comprehensive re-evaluation of the project.

A key deliverable of this re-evaluation process was the publication of a Preliminary Re-evaluation Report in May 2011, which documented the strategic issues and decisions that will inform and shape the project – including the need for the project, technical alternatives, the study area for the project, environmental and other constraints within the study area, identification of route corridor options, evaluation of route corridor options, and identification of an indicative line route within an identified preferred route corridor.

The Preliminary Re-evaluation Report, published in May 2011, formed the focus for structured public and stakeholder consultation (including engagement with directly affected landowners)<sup>1</sup> to obtain feedback on the content and conclusions of the Preliminary Report, as well as to discuss and address general and specific issues raised in respect of the overall proposed Interconnection Development.

The key conclusions of the Preliminary Re-evaluation Report were as follows:-

- 1. There is still a clear and immediate need for additional high-capacity interconnection with Northern Ireland. This will provide significant benefits for the country by means of the following:-
  - Improve competition in the all-island electricity market;
  - Improve security of electricity supply; and
  - Support the ongoing and future development of renewable power generation.
- 2. There remains a need (in the medium to long term) to reinforce the transmission network in the north-east area of the Republic of Ireland;

<sup>&</sup>lt;sup>1</sup> References to landowners in this Report should at all times be taken to mean those landowners who will be directly affected by the proposed development.

- The best technological solution for this project is a 400 kV Alternating Current (AC) single-circuit Overhead Line (OHL), running from the existing Woodland Substation in County Meath to a new substation at Turleenan in County Tyrone, which is being proposed separately by Northern Ireland Electricity (NIE);
- 4. Undergrounding of short sections of the 400 kV line is potentially feasible; however, to date no areas that would warrant undergrounding have been identified, other than the approach to Woodland substation;
- 5. The previously proposed intermediate substation in the vicinity of Kingscourt, County Cavan is not now expected to be required within the next decade and as a result it will not be included in the new application for planning approval of the North South 400 kV Interconnection development.
- Each of the route corridors identified as potentially feasible options for consideration in the previous application for planning approval of the North-South 400 kV Interconnection Development remain viable as a routing option for the proposed development;
- 7. Identified Route Corridor 3B in the Meath Study Area and Route Corridor A in the Cavan-Monaghan Study Area remain the corridors that are considered to strike the best balance between technical, environmental, community and other evaluation criteria. The identified indicative line route within these route corridors is broadly similar to that line route proposed in the previous application; however, some modifications have been made, including:-
  - Removal of the previously proposed Moyhill Substation near Kingscourt and certain modifications to the indicative line route associated with this; and
  - Local modification of the indicative line route to avoid new houses.

## 1.2 THE CONSULTATION PROCESS

Following publication of the Preliminary Re-evaluation Report, there occurred an eight-week period of public consultation, from May 9th to July 1st, 2011, wherein EirGrid invited feedback from all interested stakeholders on the findings of the Report. Notwithstanding these specified dates, EirGrid considered all feedback that was received outside this period, and this feedback has been considered as part of the re-evaluation process.

In particular, as discussed at **Section 1.5.2**, EirGrid undertook a structured process of landowner engagement in respect of the conclusions of the Preliminary Re-evaluation Report, and facilitated engagement with other interested parties outside the specified consultation period.

In summary, consultation opportunities arose in respect of the Preliminary Re-evaluation Report between EirGrid and:-

- The general public;
- Landowners;
- Observers in respect of the previous application for approval for the Meath-Tyrone 400 kV Interconnection Development (An Bord Pleanála Reference VA0006);
- County Councils;
- Elected representatives;
- Project specific interest groups; and
- Local business and interest groups.

## 1.3 CONSULTATION TERMS OF REFERENCE

As part of the consultation process, the Preliminary Re-evaluation Report and an associated community update brochure were made publicly available for consideration and comment. The documents were also published on EirGrid's project website. EirGrid invited stakeholders to provide feedback on the content of and findings in the Preliminary Re-evaluation Report, as well as the overall development, in order to learn of any new insights on aspects of the project, which would inform the Final Re-evaluation Report, and would contribute to the ongoing development of the project, ultimately leading to a new application for statutory consent.

In addition to this, as noted above, EirGrid pro-actively engaged with landowners and other stakeholders, to explain the project process, and to seek feedback on the conclusions of the Preliminary Re-evaluation Report, and on the development of the North-South 400 kV Interconnection Development project in general.

Stakeholders were invited to submit their feedback on the development and the content and findings of the Preliminary Re-evaluation Report. Stakeholders were also specifically asked to consider the following questions:-

- 1. Has EirGrid considered all relevant criteria in determining that the optimum technical solution for this project is an overhead line? If not, what additional information should EirGrid consider, or what viable, cost-effective, technically appropriate, and environmentally sensitive alternative would you suggest?
- 2. Have all environmental criteria been appropriately considered? Is there anything else that you think should be looked at?
- 3. Are there any other key issues that EirGrid should consider before submitting a new application to An Bord Pleanála?

## 1.4 PARALLEL GOVERNMENT ENDORSED REVIEW AND CONSULTATION ON MATTERS RELATED TO THE NORTH-SOUTH INTERCONNECTION PROJECT

Outside the formal period of public consultation in respect of the Preliminary Re-evaluation Report, the Minister for Communications, Energy and Natural Resources commissioned an International Expert Commission (IEC) to review and report on *a case for, and cost of, undergrounding all or part of the Meath-Tyrone 400 kV Interconnection Development*. This review was published in January 2012; subsequently in June 2012, the Joint Oireachtas Committee (JOC) on Communications, Natural Resources and Agriculture published a report on its consideration of the IEC review. Following this, in July 2012, the Department of Communications, Energy and Natural Resources (DCENR) published a *Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure*.

The findings of the IEC review, the JOC report, and the subsequent Government Policy Statement, have been considered by EirGrid in the Final Re-evaluation Report; however, it is acknowledged by EirGrid that these documents were not available for public consideration during the period of the formal public consultation process in respect of the Preliminary Re-evaluation Report. In this context, this Feedback Report does not set out EirGrid's response to these various documents; rather they are addressed in the Final Re-evaluation Report. However, it should also be noted that consultation did form part of the IEC review, the JOC report, and the subsequent Government Policy Statement.

This Government endorsed review process commenced in July 2011 and concluded in July 2012 with the publication of the Government Policy Statement, which extended beyond the timeframe for public consultation in respect of the Preliminary Re-evaluation Report. However, it was considered premature to conclude and publish the Final Re-evaluation Report and supporting appendices, including this Report, in advance of the conclusion of this parallel review process.

## 1.5 NATURE OF FEEDBACK

## 1.5.1 Written Feedback

In total, 18 no. written submissions were received from stakeholders during the public consultation period in respect of the Preliminary Re-evaluation Report. These primarily comprised private individuals (a number of whom are also landowners) within the area of the indicative line route of the proposed North-South 400 kV Interconnection Development, as identified in the Preliminary Re-evaluation Report. Submissions were also received from statutory bodies and other organisations.

A summary of these stakeholders is set out in **Table 1** below and addressed in detail in **Section 2**. All submissions are allocated a specific reference number (e.g., FS-1, FS-2 etc.), which is used throughout this Feedback Report. This Report specifically acknowledges those statutory bodies and other organisations that made submissions. However, in the context of legal obligations in respect of data protection, this Report does not detail any information which might reveal the identity of private individuals/landowners. These parties will be separately informed of their unique reference number, enabling them to determine from this Report how their particular submission has been considered.

Submission		Statutory Body / Organisation
No.	Submission Body	Detail
FS-1	Private Individual	
FS-2	Landowner	
FS-3	Landowner	
FS-4	Landowner	
FS-5	Statutory Body	NRA
FS-6	Landowner	
FS-7	Landowner	
FS-8	Statutory Body	Monaghan County Council
FS-9	Organisation	NEPP
FS-10	Organisation	Sinn Fein
FS-11	Organisation	Monaghan Anti-Pylon Committee
FS-12	Organisation	AMP/SAFE
FS-13	Private Individual	
FS-14	Private Individual	
FS-15	Private Individual	
FS-16	Organisation	Doohamlet District Community Development Association
FS-17	Private Individual	
FS-18	Private Individual	

## Table 1: Written Submissions Received during the Public Consultation Process in respect of the Preliminary Re-evaluation Report

In this Report, EirGrid and its consultants have sought to provide a comprehensive response to specific and detailed issues raised in these written submissions. These are set out in **Section 2**, and referenced by submission number. Where issues are referred to in general terms in the submissions, **Section 4** of this Report sets out the manner in which EirGrid and the Project Team has/will respond to them. This includes issues which are of relevance for the detailed design and EIA stages in the project development process e.g., the likely ecology, landscape and agronomy impacts associated with the development.

### 1.5.2 General Landowner Feedback

EirGrid continues to consult with potentially directly affected landowners on the North-South 400 kV Interconnection Project, both as part of the re-evaluation process and in terms of the on-going development of the project in general. Specifically, this stakeholder consultation phase in respect of the Preliminary Re-evaluation Report included initial landowner engagement, based upon the identified indicative line route and other conclusions of the Preliminary Report. This consultation has *inter alia* sought to identify localised constraints, and other landowner-specific issues, that:-

- Might alter the conclusions of the Preliminary Re-evaluation Report (which would thereby be reflected in the Final Re-evaluation Report); and/or
- Inform the progress towards the Preferred Project Solution (based on the undertaking of more detailed surveys and studies to confirm that the indicative project solution is feasible, taking into account often competing environmental, technical and land-use issues); and/or
- Inform EirGrid of landowner-specific preferences regarding matters of siting of structures, and other site-specific matters regarding the planned Interconnection Development.

As much of the landowner engagement focused on more detailed site specific issues, including the project's potential impact on particular landholdings, this engagement was not necessarily restricted to more strategic issues raised in, or concerning, the Preliminary Re-evaluation Report. These more specific issues will be dealt with in on-going engagement with landowners during the subsequent detailed line design phase, which in turn will inform the final proposal and associated EIS.

During landowner engagement, a number of queries and issues were also raised that relate to the project and the re-evaluation process, which are considered to require a more detailed response. These issues have been grouped into a series of questions, set out in **Table 2** below, and are addressed in **Section 3** of this Report.

As noted above, how EirGrid and the Project Team has/will respond to particular issues which have been raised by landowners and which are of relevance for the detailed design and EIA stages in the project development process e.g., the likely ecology, landscape and agronomy impacts associated with the development is set out in **Section 4**.

It should be noted that landowner engagement, specifically regarding route selection and the siting of structures, will continue through the ongoing project development process.

Enquiry No.	Detail
E-1	Is there an actual need for the project given the economic turndown?
E-2	Is the line route, as indicated, fixed or is there an element of flexibility at this stage?
E-3	Could it go along an existing disused railway line?
E-4	Why is the substation at Moyhill no longer deemed necessary?
E-5	Can EirGrid prove that no adverse health impacts will be associated with the project if it proceeds? It is felt that <i>"too much emphasis has been placed on Whooper Swans and archaeology and not enough on human health</i> "
E-6	Why can the line not be undergrounded?
E-7	Concerns for impact on agriculture, with a request that in order to minimise crop damage, construction should only occur <i>"after the harvest</i> "
E-8	Impacts on air space, including flying aircraft
E-9	Improvements on timing of landowner engagement, with a request for <i>"more time to review the information and literature"</i> before meeting with landowner agents

Table 2: Specific issues raised During Landowner Engagement	Table 2:	Specific Issues raised During Landowner Engagement
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### 1.5.3 Other Engagement Feedback

EirGrid continues to engage and consult with interested parties on the North-South 400 kV Interconnection Development (including outside of the formal re-evaluation consultation process which took place between May and July 2011). Such additional engagement and consultation has also raised issues of relevance, and accordingly, EirGrid and its consultants have taken the opportunity to include feedback from that consultation in this Report. This feedback has been collated from a variety of sources including written submissions, phone calls and meetings (including meetings with elected members).

For the purpose of clarity, this feedback has been set out on an issue-by-issue basis. It is noted that many of these issues were also raised in the written submissions or during landowner engagement received during the formal consultation process in respect of the Preliminary Re-evaluation Report. As with the other sources of feedback outlined above, this feedback includes a number of issues which are not directly relevant to the Preliminary Re-evaluation Report, but which are of relevance for the specific project design and EIA stages in the project development process (e.g., ecology, landscape, agronomy etc.). A summary of the issues raised is set out in **Table 3**. The manner in which EirGrid and the Project Team has/will respond to these issues is outlined in **Section 4** of this Report.

Issue Reference	Issue
I-1	Health
I-2	Ecology
I-3	Technology
I-4	Material Assets
I-5	Cultural Heritage
I-6	Landscape
I-7	Need
I-8	Compensation
I-9	Agriculture
I-10	Noise
I-11	Construction
I-12	Water
I-13	Geology

Table 3: Issues Raised During Other Engagement

### 1.5.4 Scope of the Responses

In order to provide a clear and demonstrable link between feedback received during the consultation on the Preliminary Re-evaluation Report, and the substance and text of the Final Re-evaluation Report, the scope of this Report is confined primarily to matters concerning the scope and content of the Preliminary Re-evaluation Report.

Where there is a recommendation to alter, add or delete text of the Preliminary Re-evaluation Report in the Final Re-evaluation Report, this is indicated in this Report. Where feedback received relates to a subsequent stage of the project e.g. detailed line design or EIA, this is noted in the text.

For the avoidance of doubt, where a submission has resulted in amendments from the original content of the Preliminary Re-evaluation Report this is highlighted at the end of the response.

Other matters raised, and submissions made, outside of, or subsequent to, the consultation on the Preliminary Re-evaluation Report, but which have a bearing on the content of the Final Re-evaluation Report, have also fed into, and have been addressed in the Final Re-evaluation Report.

## 2 RESPONSES TO WRITTEN SUBMISSIONS AND PROPOSED AMENDMENTS ARISING

## 2.1 WRITTEN FEEDBACK

EirGrid and its consultants have sought to accurately record issues and concerns set out in the submissions, and to provide a comprehensive response to same. Each submission has been reviewed, and a general overview provided. The key points of each submission (primarily using direct quotes from the submission) are also set out and numbered.

These key points below are repeated under the heading **RESPONSE TO KEY POINTS** and **a specific response is provided for each point**.

In order to provide a comprehensive response to each submission, in the context of similar issues having arisen in different submissions, it is considered appropriate that there is some necessary level of repetition of text and response in the various responses set out below. Where a response is effectively identical to a previous response, reference is made to that previous response.

### 2.2 SUBMISSION FS-1:

**Overview:** This submission raises issues primarily in relation to the matter of over-grounding versus undergrounding transmission infrastructure. It is submitted by the observer that the proposal in its current overhead line (OHL) form is not acceptable to affected individuals and the wider community, having regard to matters such as evidence of superior technical advances and alternatives, commercial considerations, health related impacts and costs, landscape impact, property devaluation, impact on tourism, sporting activities and ecology and the implications for those whose income is reliant on such activities.

#### **KEY POINTS OF THE SUBMISSION:**

1. "The project will not go ahead as planned overground and it will if it goes ahead at all be undergrounded in accordance with the wishes of the affected individuals and the wider community"

"....overwhelming evidence of not only the technical ability but also the commercial sense of undergrounding vis à vis counteracting all the negatives associated with pylons" EirGrid needs to "face the reality that technology has not only moved on substantially, offering superior alternatives.,"

2. General concerns include "children's health and associated additional health costs, landscape mutilation and associated land and house property devaluation, animal and adult health and well being and the associated additional veterinary and medical bills, tourism loss, nature and wildlife, birdlife and fish life and associated loss of income from these activities, derived from people who previously would have enjoyed these pursuits"

The submission also refers to, and encloses, a copy of the observation made by the author to An Bord Pleanála during the previous application. This separate submission sets out that *"In principle we have no objection to progress or the strengthening of the Electricity Grid if this is necessary but we strongly object to the project going ahead as presently planned by EirGrid"*. Additional specific references in this separate submission include:

- "The negative consequences on the health of farmers and their families not to mention adjacent householders is huge from the hazardous EMF emissions from the pylons".
- "...the threat to the well-being of livestock and nature from EMF....".
- "The destruction of the lovely countryside and the devaluation of property as well as the negative impact on sporting activities adjacent to these structures will bring nothing but stress and unhappiness to the peoples of these areas".

### **RESPONSE TO KEY POINTS:**

1: "The project will not go ahead as planned overground and it will if it goes ahead at all be undergrounded in accordance with the wishes of the affected individuals and the wider community".

"....overwhelming evidence of not only the technical ability but also the commercial sense of undergrounding vis à vis counteracting all the negatives associated with pylons".

EirGrid needs to "face the reality that technology has not only moved on substantially, offering superior alternatives...".

**RESPONSE:** While an underground alternative may be the preference of many of the stakeholders who have engaged on the project to date; EirGrid has to be guided by its technical expertise and experience in this matter.

EirGrid, as part of this project re-evaluation process, carried out a review to ascertain whether there have been any significant advances in underground cable (UGC) technology in recent years that might alter its previous conclusions in this matter. This review also examined whether there has been any recent change in the practices of other transmission infrastructure developers regarding the use of UGC and OHL on their transmission networks. The review focused primarily on Europe, but also referenced developments in other parts of the world. The purpose of the review was to verify whether EirGrid's position on the use of UGC on the Irish transmission system, with particular reference to the use of 400 kV UGC as is proposed in respect of the North-South 400 kV Interconnection Development, remains valid. The outcome of the re-evaluation process is detailed in Chapter 3 of the Preliminary Re-evaluation Report and is summarised below:-

- No new information has come to EirGrid's attention which would alter its opinion that a 400 kV OHL is the best technical alternative solution for this development, and that it would be significantly less costly than an equivalent UGC alternative;
- It would not be in compliance with good utility practice. In this regard, the electricity utilities in Europe still consider the use of OHL for 400 kV circuits to be best practice; and
- EirGrid is obliged, under the terms of its licence as Transmission System Operator (TSO), to develop the transmission system using least cost, technically and environmentally acceptable solutions. Based on all of the above, it is clear that in order to comply with this requirement, EirGrid must propose for the North-South 400 kV Interconnection Development, a solution that is substantially comprised of 400 kV OHL.

EirGrid's findings in this matter, as set out in the Preliminary Re-evaluation Report, are updated in the Final Re-evaluation Report with reference, in particular, to the subsequent review of the International Expert Commission on the case for, and cost of, undergrounding all or part of the North-South Interconnector and the subsequent Government Policy Statement.

2. General concerns include "children's health and associated additional health costs, landscape mutilation and associated land and house property devaluation, animal and adult health and well being and the associated additional veterinary and medical bills, tourism loss, nature and wildlife, birdlife and fish life and associated loss of income from these activities, derived from people who previously would have enjoyed these pursuits".

**RESPONSE:** Section 4 of this document sets out the manner in which EirGrid and the Project Team has/will respond to particular general issues raised (including health, landscape, property devaluation, tourism and ecology) as part of the progression towards a planning application.

## 2.3 SUBMISSION FS-2:

**Overview:** This submission which is "only in relation to the portion of the line in the Cavan Monaghan Study Area and in particular Co. Monaghan", raises a number of issues specifically in relation to the methodology and findings of the Preliminary Re-evaluation Report.

#### Key points of the submission:

- 1. The exact same route has been chosen as 'preferred' or 'best fit' *"without any of the information gleaned from that planning process taken into account with regard to amelioration. It is contended that any new issues or insights will continue to be disregarded".*
- 2. "Due to the simultaneous targeting of landowners along the historically preferred route the Preliminary Re-evaluation Report is already considered by EirGrid to be a final document".
- 3. "..during the last planning process the new substation at Moyhill was seen as an integral part of the overall project and not just some add on. The Re-evaluation Report clearly states that the substation will be still required sometime in the future. In this respect the project has now been split resulting in a bad planning application".
- 4. "With regard to the southern part of the line it is contended that the two study areas should have been unified into one study area from Woodland to the Border (Lemgare). Instead the two study areas have been re-branded as the Cavan Monaghan Study Area (CMSA) and the Meath Study Area (MSA) with the same consultants employed to carry out the re-evaluation".
- 5. "The re-evaluation report is not a robust enough document as no re-evaluation or oversight has been undertaken by appropriate new consultants coming fresh to the project".
- 6. "The Re-evaluation Report fails to explain how this reinforcement of the North East will take place given the constraints on the existing 275 kV Tandragee to Louth Interconnector"
- 7. The Re-evaluation Report focuses on just two study areas Ecology and Landscape on which to make a value judgement as to the 'most preferred' or 'best fit' route corridor. However:
  - *i.* In terms of ecology, it is contended in the submission *"that Route Option B clearly comes out as 'most preferred' or 'best fit";* and
  - *ii.* In terms of landscape it is contended in the submission that *"the landscape rating should be equal or neutral with regard to Route Corridors A and B".*

8. The submission concludes setting out "Naturally, it goes without saying that whichever route emerges, it is contended that it is inappropriate and unsustainable development in the unique drumlin landscape through which it passes".

#### **RESPONSE TO KEY POINTS:**

1. The exact same route has been chosen as 'preferred' or 'best fit' *"without any of the information gleaned from that planning process taken into account with regard to amelioration. It is contended that any new issues or insights will continue to be disregarded"*.

**RESPONSE:** Given the extent of technical and environmental work that has occurred in respect of the proposed development over the last number of years, as well as the extent of public, landowner, and other consultation and engagement that has been undertaken in respect of the overall project, it is perhaps unsurprising that the previously proposed line route substantially comprises the indicative route as identified in the Preliminary Re-evaluation Report.

In this regard, EirGrid and its consultants have had regard to the considerable body of work previously undertaken in respect of that previous decision-making process, which includes technical, environmental, planning and other reports, the Environmental Impact Statement (and associated reports) and mapping prepared in respect of the previous proposal (which in itself was based upon, and made considerable reference to, other reports, documents and mapping). EirGrid has also carefully considered the considerable volume of written and oral submissions which were presented by or on behalf of prescribed bodies, other stakeholders, and the general public, during the previous application and which for information is now included as an Appendix to the Final Re-evaluation Report.

The re-evaluation process specifically considers those issues relevant for the purpose of the identification of the study area, constraints identification, comparative evaluation of route corridor options and identification of the preliminary indicative line route. The preliminary indicative line, as identified therefore takes account of relevant issues and information raised since 2009; and while the indicative line route identified is broadly similar to the previously proposed line route it incorporates important localised modifications as follows:-

 Modifications to the line route in order to take account of the construction and granting of permission for new houses occurring since the preparation and submission of the previous application in December 2009; and • Modification arising as a result of the decision not to proceed with the intermediate substation (in the area to the west of Kingscourt) as part of the proposed application for approval of the Interconnection Development.

Next steps in the development of the North-South 400 kV Interconnection Development project will include the presentation of a more detailed preferred route alignment, following further technical and environmental analysis, and the consideration of all feedback arising during the public consultation process in respect of the Preliminary and Final Re-evaluation Report. This will be presented in a Preferred Project Solution Report, which will be published in due course, and will be the subject of a separate round of public consultation and engagement, in particular including landowner engagement.

The actual necessity or appropriateness of further potential modifications will ultimately be confirmed in the application for the North-South 400 kV Interconnection Development. As part of the preparation of the Environmental Impact Statement (EIS), EirGrid and its consultants will assess any suggested local amendments, to determine their potential environmental impact. Where these can be accommodated without creating additional environmental impact, they will be further considered in dialogue with the landowner concerned, and may ultimately comprise part of the proposal. Where it is assessed that they would create additional avoidable significant environmental impact, it is likely that it will not be possible to include them as part of the final application for planning approval.

In light of the above, it is submitted that the contention that *"new issues or insights will continue to be disregarded"* is incorrect.

2. "Due to the simultaneous targeting of landowners along the historically preferred route the Preliminary Re-evaluation Report is already considered by EirGrid to be a final document".

**RESPONSE:** It is considered both reasonable and essential that the publication of the Preliminary Re-evaluation Report was followed by a process of initial landowner engagement. The purpose of this engagement was to obtain feedback from landowners regarding the conclusions of the Preliminary Re-evaluation Report, as well as to commence more detailed surveys and studies where possible, to inform the detailed line design.

EirGrid considers that the process of consultation, including landowner engagement, is an essential component of all projects developed by EirGrid and is enshrined within the Project Development and Consultation Roadmap that EirGrid adheres to in its projects. The overall process of re-evaluation of the North-South 400 kV Interconnection Development is clearly set out in the Preliminary Re-evaluation Report (and in the Final Re-evaluation Report).

The purpose of this report is therefore to capture, review and report on all matters raised in consultation, and to provide action points in respect of same, in particular demonstrating where issues and information raised during consultation in respect of the Preliminary Report has resulted in amendments to the Final Re-evaluation Report.

3. "..during the last planning process the new substation at Moyhill was seen as an integral part of the overall project and not just some add on. The Re-evaluation Report clearly states that the substation will be still required sometime in the future. In this respect the project has now been split resulting in a bad planning application".

**RESPONSE:** EirGrid has outlined in the Preliminary Re-evaluation Report that an intermediate substation, in the vicinity of Kingscourt (not necessarily at Moyhill) will not be required for at least ten years. Accordingly, in the context of proper planning and sustainable development, it will not be included in the planning application for the Interconnection Development but will instead be the subject of its own application at a later date, when the need arises. It is incorrect to suggest that this will result *"in a bad planning application"* having regard to the facts that:

- EirGrid is preparing a detailed environmental impact statement to support the proposed application for approval for the North-South 400 kV Interconnection Development. In due course, when the need becomes more immediate, EirGrid will submit an application for statutory consent of the intermediate substation, including the undertaking of environmental assessment, and ensuring that the planned substation is presented and assessed appropriately;
- As set out in the Preliminary Re-evaluation Report, it is considered reasonable, from a transmission planning perspective, to give some consideration in this current proposal to the location of a substation, in anticipation that it will be required at some future point in time. A suitable location is in the vicinity of the point of intersection of the planned North-South (Turleenan-Woodland) 400 kV OHL and the existing Flagford-Louth 220 kV OHL, as this will minimise the additional lengths of 400 kV and/or 220 kV circuits that have to be constructed in the future in order to connect in the new substation; and
- The consideration of the requirement at a later date for such a substation is part of the Grid25 plans for undertaking the development of the network in order to support a longterm sustainable and reliable electricity supply. In this regard, EirGrid has published its Strategic Environmental Assessment (SEA) on the Grid25 Implementation Programme (IP) which anticipates and avoids adverse environmental impacts arising from the IP. At this time (and until such a time as an application is brought forward) it is considered that this would be the appropriate framework within which to consider and assess the environmental impacts of the future development of an intermediate substation.

Furthermore, given the possibility of this substation being proposed at some point in the future and the possibility that it may be in the vicinity of Kingscourt (but not necessarily at Moyhill) it is considered reasonable that an environmental impact assessment of the potential impacts arising from the possible future development of the intermediate substation should be included in the EIS as part of the consideration of potential impacts on the environment, including cumulative impacts, for the North-South Interconnector Development.

4. "With regard to the southern part of the line it is contended that the two study areas should have been unified into one study area from Woodland to the Border (Lemgare). Instead the two study areas have been re-branded as the Cavan Monaghan Study Area (CMSA) and the Meath Study Area (MSA) with the same consultants employed to carry out the re-evaluation".

**RESPONSE:** The re-evaluation of the identification of the Project Study Area is set out in Chapter 4 of the Preliminary Re-evaluation Report including relevant consideration of the appropriate points of connection for a new North-South Interconnector and the background to the separate projects in the Republic of Ireland which became a single scheme.

EirGrid and its consultants have adopted an integrated approach to the consideration of the environment and technical constraints and in routing the transmission infrastructure within the overall larger study area south of the border. It has also rationalised the number of environmental specialists on the project team so that there is now only one specialist per environmental speciality responsible for the overall study area. This will ensure consistent methodologies for the identification of constraints, route corridors and line routes for both the CMSA and MSA.

It remains the view of EirGrid that it is appropriate to present the overall project in two portions, to facilitate review by the public and other parties of that portion of the scheme which is of most importance to them, rather than having to seek out this information as part of a much larger study area. This is consistent with how the project was previously presented to the public.

5. "The re-evaluation report is not a robust enough document as no re-evaluation or oversight has been undertaken by appropriate new consultants coming fresh to the project".

**RESPONSE:** It is the case that the considerable body of work undertaken in respect of that previous application for approval for the North-South Interconnection Development (and the years of feasibility work leading up to it) remains entirely relevant to the re-evaluation, and ongoing development, of this project. Against this background, it is considered that the introduction of new consultants at this time would not be of any benefit to the project.

6. "The Re-evaluation Report fails to explain how this reinforcement of the North East will take place given the constraints on the existing 275 kV Tandragee to Louth Interconnector".

**RESPONSE:** The observer notes correctly that the maximum permitted power transfer across the existing 275 kV Tandragee to Louth Interconnector is currently constrained to a level well below its actual power carrying capacity. This is as a direct consequence of the fact that there is currently only one high capacity North-South Interconnector. However the development of a second high capacity North-South Interconnector will effectively eliminate this constraint. It is in this circumstance, and as explained at Section 4.1 of the Preliminary Re-evaluation Report, that the proposed second North-South Interconnector, connecting between the existing Woodland Substation in County Meath and the proposed new substation in Turleenan in County Tyrone, will reinforce the transmission network in the North-East area. It will achieve this by effectively bypassing the existing high capacity transmission circuits running between the Greater Dublin Area and the transmission network in Northern Ireland (via Louth Substation), thus freeing up spare capacity on these circuits in the short and medium terms for the supply of electricity to local consumers.

The manner in which the proposed interconnector will reinforce the north-east area is further expanded in section 4.1 of the Final Re-evaluation Report.

- 7. The Re-evaluation Report focuses on just two study areas Ecology and Landscape on which to make a value judgement as to the 'most preferred' or 'best fit' route corridor. However:
  - *i)* In terms of ecology, it is contended in the submission "that Route Option B clearly comes out as 'most preferred' or 'best fit'"; and
  - *ii)* In terms of landscape it is contended in the submission that "the landscape rating should be equal or neutral with regard to Route Corridors A and B".

**RESPONSE:** A qualitative assessment using professional judgement based on engineering, environmental and other criteria is considered a reasonable approach in undertaking a comparative analysis between different route corridor options. This approach is frequently used in undertaking such analysis in respect of other linear projects by other infrastructure providers (e.g., roads, rail and pipelines). Such an approach identifies the different route options as being "More or "Less Preferred" and "Least Preferred" – essentially referring to the extent of environmental and other constraints associated with each option. This type of analysis allows comparisons to be made across a range of competing criteria, so that the project that has the lowest overall environmental impact is selected above projects that create a higher level of environmental impact. In this regard, it is important to understand that the term "preferred" is a

generally accepted industry term for infrastructure route selection by which is meant the "least constrained" or "best-fit" option.

Throughout the Preliminary Re-evaluation Report, the consultants have justified, with reference to their professional judgement, the route corridor that constitutes "*the most appropriate balance between the various technical, environmental and other evaluation criteria*". In particular, they have considered the fact that while most potential impacts can be minimised by mitigation as part of the detailed design process, there will be some potentially significant impacts which cannot be entirely mitigated. In the Environmental Impact Assessment process these are referred to as residual impacts.

Whilst the corridor evaluation process had regard to a variety of different environmental and other criteria, there was found to be no significant difference in comparing route corridor options, for the purposes of the re-evaluation process, between a number of such criteria including water, geology settlements and infrastructure/utilities – hence no further consideration was given to them in the comparative evaluation. On the other hand, there was a discernible difference between the identified route corridor options in terms of ecology and visual impact which resulted in a greater focus on these criteria.

The Preliminary Re-evaluation Report concludes that, in ecological terms, Route Corridor Option B is more preferred than both Route Corridor Options A and C, but in relation to landscape, Route Corridor Option A is more preferred to Route Corridor Options B and C.

In balancing the ecological and landscape impacts against each other, in order to reach an overall conclusion, consideration needs to be given to the principles underlying environmental impact assessment.

The basic principles which underlie environmental assessment are impact avoidance, reduction and mitigation. In relation to an OHL, avoidance of visual impact in close proximity to the OHL is generally not possible but it is possible to reduce and mitigate visual impacts on the wider landscape by selecting a route corridor which creates the lowest level of visual impacts. In relation to ecology it is generally possible to avoid and reduce impacts by placing structures in particular locations which are less sensitive in ecological terms.

Having regard to the wider landscape setting within which route corridors should be considered, Route Corridor Option A and Route Corridor Option B have been identified as the route corridor options which reduce the visual impacts to the greatest extent possible, when compared to other route corridor options (notwithstanding the fact that all corridors create visual impacts). In conclusion, greater clarity has been provided within the Final Re-evaluation Report regarding the evaluation process and outcome; and in particular the reasons as to why ecology and landscape became the focus when evaluating corridors.

8. The submission concludes setting out "Naturally, it goes without saying that whichever route emerges, it is contended that it is inappropriate and unsustainable development in the unique drumlin landscape through which it passes".

**RESPONSE:** The landscape of Co. Monaghan forms part of a drumlin belt which runs across the country from Strangford Lough in Co. Down to Donegal and Clew Bay in Mayo. While topography is a prime contributor to landscape character in Monaghan, this character is also formed by agricultural and settlement patterns, trees and hedgerows, and existing built features such as roads, walls, buildings, communications and electricity infrastructure. Most of the roads, and therefore most opportunities for viewing the proposal, follow the lower ground within the undulating landscape. As a result, most views are relatively short distance and are enclosed by the drumlin topography. The proposed development will not affect the underlying topography of the landscape to the same extent as would, for example, a major road

The drumlin landscape results in enclosed or open views depending on the elevation of the viewpoint. Therefore, drumlin topography can either elevate or conceal individual towers in the landscape. The dynamic and complex nature of undulating countryside provides fore, middle and distant ground to a vista that helps to provide realistic scale and visual containment not available in open country. Where towers are located on higher ground, there is potential for visibility over a wider area. The line design has therefore aimed to keep the development to a low as possible elevation for as much as possible of the route. The linear nature of the development, the need to keep direction change to a minimum, constraints in the natural environment and the avoidance of dwellings mean it is not always possible to follow the lowest part of the landscape and some towers will inevitably be located at higher elevations.

## 2.4 SUBMISSION FS-3:

**Overview:** This submission raises concerns in respect of the health implications of overhead pylons. Other points include advising EirGrid of restricted access to lands because of the nature of the tillage cycle. The observer advises of unwillingness to deal with agents on behalf of EirGrid.

#### Key points of the submission:

1. EirGrid wishes to proceed with *"a health-threatening scheme of overhead pylons against the clear wishes of those whose land you wish to cross"*.

2. "..an antagonistic approach to landowners who wish to be cooperative".

"I am not prepared to deal with an unknown third party on any issue to do with your project or access to lands"; and

"I am sure landowners would be willing to be cooperative if there was evidence that EirGrid listened to and acted upon the concerns. There has been little evidence of that."

3. "Given the nature of the tillage cycle, this will mean that access to the property cannot be made in the growing season."

#### **RESPONSE TO KEY POINTS:**

1. EirGrid wishes to proceed with "a health-threatening scheme of overhead pylons against the clear wishes of those whose land you wish to cross".

**RESPONSE:** EirGrid acknowledges that health is a concern for affected individuals (including landowners) and the public. **Section 4** of this document sets out the manner in which EirGrid and the Project Team has/will respond to particular general issues raised (including health) as part of the progression towards a planning application.

2. "..an antagonistic approach to landowners who wish to be cooperative".

"I am not prepared to deal with an unknown third party on any issue to do with your project or access to lands"; and

"I am sure landowners would be willing to be cooperative if there was evidence that EirGrid listened to and acted upon the concerns. There has been little evidence of that."

**RESPONSE:** Subsequent to receiving this particular submission, EirGrid met with this landowner and resolved his concerns expressed in relation to dealing with EirGrid and its representatives.

EirGrid acknowledges landowner concerns in respect of the project's potential impact on specific landholdings, and it continues to pursue consensus in relation to the routeing of the line, and in particular the location of towers, by proactively engaging with landowners to try and mitigate any potential impact on current farming practices and other land uses, while trying to balance other competing priorities such as environmental constraints and distance to dwellings. This will be considered during the next stage of the project – Route Confirmation - in the context of ongoing

technical and environmental studies and stakeholder (in particular landowner engagement) consultation.

3. "Given the nature of the tillage cycle, this will mean that access to the property cannot be made in the growing season".

It should be noted that access to survey is not invasive and primarily involves walking the land. Through landowner site visits, EirGrid wishes to ascertain whether and how the proposed OHL might affect landowners, and how this might be best resolved to the greatest possible extent, for example agreeing tower positions with landowners where these are acceptable from a technical and environmental perspective.

# 2.5 SUBMISSION FS-4:

**Overview:** This submission raises issues relating to opportunities for partial undergrounding along the route alignment and modifications to the route alignment. The submission considers that partial undergrounding would have the effect of significantly dealing with concerns in respect of *"environmental impacts on their house, lands and family*". It also identifies other potential modifications to the route alignment which would maximise the distance from the subject property.

#### Key points of the submission:

- 1. "The new proposal put forward by EirGrid shows no change at all in relation to the line".
- "Consideration of alternatives is ongoing ..... that it is possible to underground part of this line
  ...." and ".... that it is accepted that such an underground section could be of the order of 10
  kilometres".
- 3. "The concerns that we have raised relate to the visual impact, the impact of the line would have on health and noise, the impact on our farming practice and general nuisance attached to a line of this size and scale in such close proximity to our house". If the line was to go underground this would deal with these concerns".
- 4. "If the option of an underground route for the line is not acceptable, then any overground line should proceed through [other specified] lands at the maximum distance possible from our property and from our dwelling house in particular".

#### **RESPONSE TO KEY POINTS:**

1. "The new proposal put forward by EirGrid shows no change at all in relation to the line".

**RESPONSE:** As set out in FS-2 above (in response to point no.1), the Preliminary Reevaluation Report is considered to clearly document the rationale for decisions taken which has resulted in largely the same route with some localised modifications being identified. Given the extent of technical and environmental work that has occurred in respect of the proposed development over the last number of years, as well as the extent of public, landowner, and other consultation and engagement that has been undertaken in respect of the overall project, it is perhaps unsurprising that the previously proposed line route substantially comprises the indicative route as identified in the Preliminary Re-evaluation Report. The purpose of this reevaluation process is to ensure that there is an understanding of, and confidence in, EirGrid's conclusions, and that is why this process provides for significant public and stakeholder input as well as an opportunity to provide inputs and suggestions on the routing of the line.

However, it should be noted that the route identified in the Preliminary Re-evaluation Report (and in the Final Re-evaluation Report) comprises an indicative line route, and not the final designed or proposed route. The preferred line design will be detailed in a Preferred Project Solutions Report, which will be published in due course. There is still scope for landowners to influence the detailed route of the alignment.

Further potential localised modifications to the line route are matters which will be dealt with in consultation with the competent authorities, in discussions with landowners, and in reference to conclusions of ongoing studies. As part of the EIA process, and assuming appropriate and adequate access to lands, EirGrid will assess any suggested localised amendments to determine if there are any potential environmental impacts. Where these can be accommodated without creating additional environmental impacts they will be further considered. Where it is assessed that they would create additional avoidable significant environmental impacts it is unlikely that they will be capable of being further considered. All localised assessments will form part of the EIS.

Consideration of alternatives is ongoing ..... that it is possible to underground part of this line
 ..." and ".... that it is accepted that such an underground section could be of the order of 10
 kilometres".

**RESPONSE**: One of the findings of the Preliminary Re-evaluation Report is that a hybrid 400 kV UGC/OHL circuit may be feasible, but only:

• If the length of UGC to be installed is relatively short;

- Where the cost of using the short length of UGC can be proven to be an environmentally advantageous and cost effective way of overcoming an environmental or technical constraint to the preferred OHL; and
- Where it can be confirmed that the use of UGC does not exceed the transmission system's capacity to accommodate such cables.

On the basis of updated environmental constraints and other information, EirGrid and its consultants consider that at the strategic level of the re-evaluation process, no material implications would warrant the use of UGC along any part of the identified indicative line route, other than that identified section within the area of Woodland Substation. Reference is made to page 131 of the Preliminary Re-evaluation Report which sets out:

"At this stage in the process, EirGrid and its consultants are of the consideration that on the basis of the re-evaluation of updated environmental and other information, a viable and environmentally acceptable preliminary indicative line route for a 400 kV OHL exists."

EirGrid's findings in this matter, as set out in the Preliminary Re-evaluation Report, are addressed in the Final Re-evaluation Report in reference to the review of the International Expert Commission on the case for, and cost of, undergrounding all or part of the North-South Interconnector and the subsequent Government Policy Statement.

However, EirGrid acknowledges that there are landowner concerns in respect of the project's potential impact on specific landholdings. It will consider and assess all requests to modify the line route, in dialogue with directly affected landowners. This will include landholding-specific consideration of technical, environmental, cost and other criteria. This will be considered during the next stage of the project, rather than in this stage of strategic project re-evaluation, in the context of ongoing technical and environmental studies and consultation with competent authorities and landowners.

In conclusion therefore it remains EirGrid's position that there are no areas along the indicative line route that would warrant partial undergrounding (other than a short section within the confines of the existing Woodland Substation), including the section referenced in this submission. EirGrid will however investigate this option further as part of the consideration of alternatives to be addressed in the EIS which will accompany an application for planning approval for the North-South 400 kV Interconnection Development.

3. "The concerns that we have raised relate to the visual impact, the impact of the line would have on health and noise, the impact on our farming practice and general nuisance attached to a line of this size and scale in such close proximity to our house. If the line was to go underground this would deal with our concerns".

**RESPONSE:** Section 4 of this document sets out the manner in which EirGrid and the Project Team has/will respond to particular general issues raised (landscape, health, noise and agronomy) as part of the progression towards a planning application.

4. "If the option of an underground route for the line is not acceptable, then any overground line should proceed through [other specified] lands at the maximum distance possible from our property and from our dwelling house in particular".

**RESPONSE:** EirGrid's policy for dealing with a request such as this is that it will be accommodated as long as it is technically feasible; does not result in an additional environmental impact; and the receiving adjacent landowner consents to the route modification, in full knowledge of the reason for said modification. This particular request is being dealt with in accordance with this policy and EirGrid is working with the landowner in question with a view to finding an acceptable solution.

# 2.6 SUBMISSION FS-5:

**Overview:** This submission by the National Roads Design Office notes that Route Corridor 3B in the Meath Study Area appears to cross the M3 Motorway near Grange. It notes that although this land is registered to Meath County Council, it contains the M3 Motorway which is run by EuroLink M3 under licence from the National Roads Authority (NRA). It requests that both EuroLink M3 and the NRA be consulted regarding any proposed works to be carried out on or over this land.

**RESPONSE:** EirGrid has and will continue to engage with EuroLink M3 and the NRA in developing the project, and preparation of the EIS, as well as prior to any proposed works being carried out on this land.

# 2.7 SUBMISSION FS-6:

**Overview:** This submission is from a landowner and raises issues relating to route alignment and choice of transmission technology.

#### Key points of the submission:

- 1. Potential for an alternative route alignment; and
- 2. Outlines general support for an over head line option setting out "*I* do not mind what route to take and object to underground because of cost and difficulty doing repairs".

## **RESPONSE TO KEY POINTS:**

1. Potential for an alternative route alignment.

**RESPONSE:** EirGrid acknowledges landowner issues in respect of the project's potential impact on specific landholdings. It has established a series of protocols to consider and assess requests for local modification of the line route in dialogue with directly affected landowners. This will include landholding specific consideration of technical, environmental, cost and other criteria. This will be considered during the next stage of the project – Route Confirmation - in the context of on-the-ground surveys, ongoing studies and consultation with competent authorities and the individual landowners.

As part of the EIA process, EirGrid will assess any suggested alternative localised amendments to determine the potential environmental impacts. Where these can be accommodated without creating additional environmental impacts they will be further considered. Where it is assessed that they would create additional avoidable significant environmental impacts it is unlikely that they will be capable of further consideration. All localised assessments will form part of the EIS.

2. Outlines general support for an over head line option setting out "*I* do not mind what route to take and object to underground because of cost and difficulty doing repairs".

EirGrid notes the landowner's objection to the use of an underground cable solution for this project. The reasons stated are consistent with EirGrid's position on this matter as set out in section 3.7 of the Preliminary Re-evaluation Report.

EirGrid's updated consideration of the technical alternatives, as set out in the Preliminary Reevaluation Report, are addressed in the Final Re-evaluation Report in reference to the review of the International Expert Commission on the case for, and cost of, undergrounding all or part of the North-South Interconnector and the Government Policy Statement.

In conclusion, Chapter 3 of the Final Re-evaluation Report addresses the findings of the review of the International Expert Commission and the subsequent Government Policy Statement.

# 2.8 SUBMISSION FS-7:

**Overview:** This submission primarily raises issues relating to constraints and line route design.

## Key points of the submission:

- 1. What is the definition of 'constraint' and 'sensitive receptor'?
- 2. Does EirGrid intend to apply the WHO guidelines regarding the minimum distance of 50 metres from residential properties along the entire length of the North-South Interconnector?
- 3. Why is our house and garden not regarded as a residential constraint?
- 4. Will the stringing of the free side of the existing Moneypoint to Woodland 400 kV line be included in the EIS"?

This submission also raises some site-specific queries which are not relevant to the re-evaluation process; these will be dealt with separately and directly with the individuals concerned.

## **RESPONSE TO KEY POINTS:**

1. What is the definition of 'constraint' and 'sensitive receptor'?

**RESPONSE:** The terms 'constraint' and 'sensitive receptor' are common terms used in environmental impact assessment. However, in the interests of clarity an explanatory note is provided in the Final Re-evaluation Report in respect of these terms.

As a result explanatory text has been inserted into Chapter 5 of the Final Re-evaluation Report and the terms have been added to the Glossary of Terms, as follows: Receptor - any element of the environment which is subject to impacts

Constraint – any physical, environmental, topographical, socio-economic or other condition that may affect the location, development and other aspects of a proposal

Sensitivity – the potential of a receptor to be significantly changed.

Furthermore, the corridor evaluation process has been further described in the Final Reevaluation Report.

2. Does EirGrid intend to apply the WHO guidelines regarding the minimum distance of 50 metres from residential properties along the entire length of the North-South Interconnector?

**RESPONSE:** There are no World Health Organisation (WHO) guidelines which specify a minimum separation distance between high voltage overhead lines and residential properties. The WHO has however endorsed the guidelines produced by ICNIRP (International Commission on Non-Ionizing Radiation Protection).

Overhead transmission lines come in many shapes and sizes, with different voltage levels, different power carrying capacities and different configurations. The strength of an EMF emanating from a given overhead line is directly related to all of these variables. The ICNIRP guidelines recognise this fact and instead of specifying a minimum clearance distance the Guidelines specify 'Basic Restriction Levels' for the exposure of the general public to EMF. As the strength of the EMF is at its highest in the immediate vicinity of the live wire and decreases rapidly with growing distance from the overhead line a minimum clearance distance from an overhead line to a dwelling that satisfies the Guidelines can be derived for every type and size of overhead line.

The 1998 ICNIRP Guidelines have also been endorsed by the EU Commission and form the basis of EU Council Recommendation 1999/519/EC which describes the EU Guidelines. The Irish Government has adopted the EU Guidelines without variation. EirGrid designs and operates the Irish transmission network in accordance with the EU Guidelines. The North South 400 kV Interconnector will comply with the EU Guidelines and therefore it can be stated that it will comply with the derived minimum separation distance between existing dwellings and the live wires of the transmission line.

Additional information about electric and magnetic fields in Ireland can be found in "EMF and You", an EirGrid information brochure available from <u>www.eirgridprojects.com</u>.

3. Why is our house and garden not regarded as a residential constraint?

**RESPONSE:** Residential properties are always considered a constraint for the purpose of proposed new transmission projects (including new line routes, new substation sites and the expansion of existing transmission infrastructure).

In the Preliminary Re-evaluation Report, one of the most significant constraints for corridor identification comprised settlements and areas of population density (refer to Map 6 (MSA / CMSA)). In respect of the identification of the indicative line route, dwellings are considered as a significant constraint. In this particular project, the Preliminary Report acknowledges that the extensive dispersed rural settlement (i.e. dwellings and ribbon development) within the Study Area, creates a difficult constraint that affects the positioning of the transmission line within any route corridor. However, it is also acknowledged that appropriate mitigation measures will need to be incorporated into the detailed design in order to address this.

EirGrid acknowledges landowner concerns in respect of the project's potential impact on specific landholdings and it continues to pursue consensus in relation to the routing of the line, and in particular the location of towers, by proactively engaging with landowners to try and mitigate any potential impact on current farming practices and other land uses, while trying to balance other competing priorities such as technical necessity, environmental constraints, and proximity to dwellings. This is not a matter for this re-evaluation process, but rather will be considered in detail during the next stage of the project, in the context of ongoing technical and environmental studies, and in consultation and engagement with competent authorities and landowners.

As part of the detailed line design and EIA process, EirGrid will assess any suggested or identified alternative local modifications, to determine resulting potential environmental impacts. Where these can be accommodated without creating additional environmental impacts they will be further considered. Where it is assessed that they would create additional avoidable significant environmental impacts it is unlikely that they will be capable of further consideration. All localised assessments will form part of the EIS.

4. Will the stringing of the free side of the existing Moneypoint to Woodland 400 kV line be included in the EIS?

**RESPONSE**: Yes, the EIS to accompany the new application for planning approval will clearly assess the full extent of the proposed development, including the stringing of the free side of the existing Moneypoint to Woodland 400 kV line, should this form part of the preferred project solution.

# 2.9 SUBMISSION FS-8:

**Overview:** This submission was made by the Executive of Monaghan County Council. It submits that its concerns remain broadly the same as those submitted to An Bord Pleanála in respect of the previous application for approval (both in writing and to the Oral Hearing). The specific point is:

"It is understood that the route of the line through County Monaghan remains broadly as submitted to An Bord Pleanála in your earlier application to them, as considered at the oral hearing. As such the concerns previously expressed by Monaghan County Council, both in its written report and provided orally at the hearing remain."

These issues / concerns raised during the previous application for approval are summarised below and include:

- 1. National, regional and county development plans support the proposal in principle;
- 2. There is limited information in the EIS to justify the interconnector being taken through County Monaghan;
- 3. EIS fails to take account of the Monaghan Landscape Character Assessment and the impact of the siting of the towers in the various Landscape Character Types and Areas;
- 4. EIS has failed to justify the positioning of towers in particular locations in the landscape and has not given due regard to policies ENV 2 and ENV 3 and the County Development Plan (CDP);
- 5. The photomontages should also take account of not only the proposed line but also the potential for the line to deviate 40 metres either side of the proposed line;
- 6. No Zone of Visual Influence (ZVI) Assessment was submitted;
- 7. The EIS has failed to properly assess the visual impact of the proposed development upon the views from the scenic routes designated in the Monaghan County Development Plan 2007 2013 and the settings of lakes and their environs and any mitigation measures have not been included;
- 8. The EIS has failed to assess the impact of the proposed development upon trees and hedgerows along its route (specifically the low level of clearance);

- 9. The EIS failed to properly assess the impact of the proposed development upon biodiversity in the vicinity and mitigation measures have not been included. It is apparent from the lack of detail provided that no botanical surveys were undertaken;
- *10.* Contour / topographical maps showing each tower location, its elevation and its relationship to surrounding area should be submitted;
- *11.* Some of the details regarding status of sites has been incorrectly transcribed from the CDP to give a lower importance to sites;
- 12. Although the proposed development passes in proximity to a number of protected structures and historic gardens, it is considered that it will have limited impact upon the integrity or setting of these structures. A Zone of Visual Influence Assessment included with the EIS would be seminal in making a full assessment;
- *13.* In order to determine the nature and scale of impacts on known archaeology, a photographic analysis of these visual impacts should be provided;
- 14. The EIS has failed to adequately assess the impact of the development as proposed and also with regard to micrositing of the proposed development upon existing and permitted development;
- 15. The EIS has inadequate detail in relation to routes used by construction traffic, facilitating works to allow construction and traffic access, traffic management and reinstatement works;
- *16.* Landscape and the natural environment are important in respect of tourism. The EIS has failed to properly take into account the impact of the proposed development on tourism; and
- 17. Inadequate consideration has been given of the impact of the construction of the line anywhere within the corridor, particularly as a deviation of 40 metres in any direction could represent a significant change in both base level and height of the towers.

## **RESPONSE TO KEY POINTS:**

1. National, regional and county development plans support the proposal in principle.

**RESPONSE:** The comments that national, regional and county development plan policies support the proposal in principle are noted and welcomed.

# 2. There is limited information in the EIS to justify the interconnector being taken through County Monaghan.

**RESPONSE:** Chapter 4 of the Preliminary Re-evaluation Report sets out the re-evaluation of the points of connection of the new North-South Interconnector to the existing transmission system and the background to the identification of the defined study area, which includes County Monaghan. The reasons for routing the proposed line through County Monaghan are clearly set out, along with alternative locations that were considered.

The identified preferred route corridor (approximately 1 km wide) and indicative line route within that corridor identified in the Preliminary Re-evaluation Report remains substantially as per the previous proposal. In reaching this conclusion, the re-evaluation process has not identified any issue which would require significant modification to that previously proposed alignment within County Monaghan. However, the overall re-evaluation process, including public and stakeholder consultation, is intended to identify any issues that might have been overlooked in the Preliminary Re-evaluation Report, and which would justify such modification of the alignment. In addition, the overall re-evaluation process will conclude with the identification of an indicative line route; this will be subject to detailed line design confirmation and environmental assessment, in dialogue with directly affected landowners and other stakeholders, which are likely to result in local modifications to the alignment in the final proposal.

In conclusion, Chapter 4 of the Final Re-evaluation Report has been reviewed; re-organised and additional graphics are now included in order to clarify the reasons why the interconnector passes through County Monaghan, as well as through the other counties.

#### 3. Points 3 – 17 (as identified above)

**RESPONSE:** These points detail specific aspects of the EIS and suggest that the EIS has failed to adequately assess various aspects of the proposed development in areas such as landscape, ecology, cultural heritage, micrositing and tower location, construction traffic and tourism.

All these comments are noted; it is considered that these are not matters for this re-evaluation process, but rather relate to the preparation of the proposed application for planning approval and the accompanying EIS. It is acknowledged that, in response to the feedback from Monaghan County Council, there may be a need for greater clarity in the particulars of the forthcoming application. This will be taken into consideration during the next stages of project development and application preparation, including the preparation of the EIS; EirGrid will seek to discuss such matters with the Executive of Monaghan County Council - in particular the presentation of EIS material will be discussed to ensure it is clear where and how all matters raised by Monaghan County Council are addressed.

# 2.10 SUBMISSION FS-9:

**Overview:** This submission by NEPP sets out summary feedback in respect of the Preliminary Reevaluation Report.

#### Key points of the submission:

- 1. "...refusal by EirGrid to objectively examine all practical and feasible options for implementing this Project, especially the publically acceptable option of undergrounding the transmission lines".
- 2. "... failure by EirGrid to professionally address the inadequacies and deficiencies highlighted during the Oral Hearing in 2010. Specifically, the following issues have not been addressed, accepted or solved:
  - *i.* Project Splitting that Woodland's impacts and the cumulative impacts of the East-West and North-South interconnector Developments, have not been assessed.
  - ii. Substation siting
  - iii. Agriculture and farming impacts
  - iv. Landowner / house owner property devaluation impact
  - v. Landscape and Visual Amenity Issues
  - vi. Alternative technologies
  - vii. Public consultation
  - viii. Health and Safety concerns
  - ix. Noise Pollution Controls
- 3. "NEPPC notes the aggressive behaviour and misleading information being meted out to landowners on foot of this report".

#### **RESPONSE TO KEY POINTS:**

1. "...refusal by EirGrid to objectively examine all practical and feasible options for implementing this Project, especially the publically acceptable option of undergrounding the transmission lines".

**RESPONSE**: While an underground alternative may be the preference of many of the stakeholders who have engaged on the project to date; EirGrid has to be guided by its technical expertise and experience in this matter. Refer to **Section 2.2**, FS-1 – point no. 1 which sets out EirGrid's full response to this.

In conclusion, in Chapter 3 the Final Re-evaluation Report addresses the findings of the review of the International Expert Commission in respect of the Meath-Tyrone 400 kV Interconnection Development and the subsequent Government Policy Statement.

2. "... failure by EirGrid to professionally address the inadequacies and deficiencies highlighted during the Oral Hearing in 2010.

EirGrid does not accept the contention that alleged '*inadequacies and deficiencies*' raised by the observer at the oral hearing in 2010 were not adequately addressed. The issues raised by the observer were addressed at that hearing by EirGrid. The specific issues raised in this latest submission are addressed below.

2(i) Project Splitting – that Woodland's impacts and the cumulative impacts of the East-West and North-South interconnector Developments, have not been assessed.

As noted previously in **Section 2.3** (in response to FS-2, point no. 3) it is important that the full extent of any project is properly identified and assessed. The term 'project splitting' refers to a project being artificially broken up into a series of separate projects (and planning applications) to avoid triggering a requirement for environmental impact assessment, in particular.

EirGrid is undertaking a detailed environmental assessment to support the new application for planning approval for the North-South 400 kV Interconnection Development (to include works to the Woodland Substation); EirGrid also undertook environmental assessment to support the application for the East-West Interconnector (including works to the Woodland Substation). Accordingly, concerns relating to 'project splitting' are not considered relevant as the applications have been / will be accompanied by environmental assessment, which will include analysis of any and all cumulative impacts associated with the proposed North-South Interconnection Development.

#### 2(ii) Issue - Substation siting

**RESPONSE:** As set out in Chapter 4 of the Preliminary Re-evaluation Report, EirGrid is now of the opinion that an intermediate substation in the vicinity of Kingscourt (not necessarily at Moyhill) is not now expected to be required within the next 10 years; and it is therefore not considered necessary or appropriate to include it in the new application for the proposed North-South 400 kV Interconnection Development.

However, given the possibility of this substation being proposed at some point in the future and the possibility that it may be in the vicinity of Kingscourt (but not necessarily at Moyhill) it is considered reasonable that an environmental impact assessment of the potential impacts arising from the possible future development of the intermediate substation should be included in the EIS as part of the consideration of potential impacts on the environment, including cumulative impacts, for the North-South Interconnection Development.

(2)(iii) – (ix) Issues as detailed above.

**RESPONSE:** These are matters which are not considered to be within the scope of this Reevaluation process, but which are more pertinent to the project development process, including preparation of an EIS and the process of environmental impact assessment. In developing its proposal, EirGrid and its consultants will consider the proposed development in respect of all these environmental issues. **Section 4** of this document sets out the manner in which EirGrid and the Project Team has/will respond to particular general issues raised (including agronomy, landscape and health) as part of the progression towards a planning application.

**3.** "NEPPC notes the aggressive behaviour and misleading information being meted out to landowners on foot of this report ......especially in relation to the statements by EirGrid and/or its agents related to pylon compensation costs and ESB/IFA code of practice."

**RESPONSE:** On foot of this feedback EirGrid has conducted a full internal audit of all its communications and landowner engagement activity, and is satisfied, in the absence of any details of an alleged incident, that no aggressive behaviour towards landowners by EirGrid or its agents has occurred.

In the event that a proposed transmission development receives planning approval and proceeds to construction any losses incurred by the landowner of lands on which the line is constructed will be compensated by means of a statutory compensation process. A landowner who is dissatisfied with the amount of compensation offered has the statutory right to have the compensation amount assessed by an independent arbitrator.

The 'ESB/IFA Code of Practice for Survey, Construction & Maintenance of Overhead Lines in Relation to the Rights of Landowners' is a publically available document. During engagement with landowners the existence of the ESB/IFA Code of Practice is brought to the attention of landowners by EirGrid and/or its agents. If the landowner requests a copy of the document one is provided.

# 2.11 SUBMISSION FS-10:

**Overview:** Submission by Sinn Fein, representing those communities in counties Meath, Cavan and Monaghan who "are deeply concerned at the restated intent of EirGrid to force a 400 kV Interconnector across their lands and in close proximity to their homes, schools and places of work".

#### Key points of the submission:

- 1. EirGrid is "going through the motions" embarking on "this further so called public consultation exercise given the extent of communication of their total opposition to the pylon supported overhead powerline plans of EirGrid and NIE by individuals, families, groups and whole communities along the entire length of the proposed route...".
- 2. Having regard to all engagements, objections, submissions and presentations to the Oral Hearing (in respect of the previous application) that it is clear that "communities will only give their support to the interconnector if it is proceeded with by way of underground cabling".
- 3. "What plans have the Company to compensate the many individuals and community groups left significantly out of pocket for their efforts to inform the process" as a result of the collapse of the 2010 Oral Hearing; and
- 4. Other considerations framing the opposition to the overhead option include health, the environment, agriculture, homes, communities and tourism considerations.

#### **RESPONSE TO KEY POINTS:**

1. EirGrid is "going through the motions" embarking on "this further so called public consultation exercise given the extent of communication of their total opposition to the pylon supported overhead powerline plans of EirGrid and NIE by individuals, families, groups and whole communities along the entire length of the proposed route...".

**RESPONSE:** EirGrid has been consulting and engaging on this project for the last number of years, and inputs from the public and other stakeholders have formed an important element of the project development to date. The Preliminary Re-evaluation Report is very clear as to how

and why decisions have been made and endorsed in shaping the proposed development. The suggestion that EirGrid is *"going through the motions"* is incorrect. Specific reference is made to the following:

- The process of public and stakeholder consultation is intended to provide stakeholders with an opportunity to provide their feedback on the content and findings of the Preliminary Re-evaluation Report and to identify any additional issues or insights that should be considered as part of the re-evaluation process which would justify a modification to the overall planned project, or indicative route alignment; and
- EirGrid continues to pursue consensus in relation to the routing of the line, and in particular the specific location of towers, by proactively engaging with landowners to try and mitigate any potential impact on current farming practices and other land uses, while trying to balance other competing priorities such as environmental constraints and distance to dwellings.

It is the case that, due to the technical nature of a project, or competing environmental priorities, it may not always be possible to accommodate suggestions by stakeholders regarding the nature and routing of a transmission line. In this instance, the indicative route identified by EirGrid in the Preliminary Re-evaluation Report (and as now presented in the Final Re-evaluation Report), is considered to ensure the most appropriate balance between often competing technical, environmental, community and other criteria.

2. Having regard to all engagements, objections, submissions and presentations to the Oral Hearing (in respect of the previous application) that it is clear that "communities will only give their support to the interconnector if it is proceeded with by way of underground cabling".

**RESPONSE:** While an underground alternative may be the preference of many of the stakeholders who have engaged on the project to date; EirGrid has to be guided by its technical expertise and experience in this matter. EirGrid's full response to this issue is set out in **Section 2.2** of this Report, in response to FS-1, point no.1.

In conclusion, Chapter 3 of the Final Re-evaluation Report addresses this issue in the context of addressing the findings of the **review of the International Expert Commission and the subsequent Irish** Government Policy Statement.

3. "What plans have the Company to compensate the many individuals and community groups left significantly out of pocket for their efforts to inform the process" as a result of the collapse of the last Oral Hearing".

**RESPONSE:** The issue of compensation is not considered to comprise a matter for the reevaluation process in respect of the North-South 400 kV Interconnection Development project.

4. Other considerations framing the opposition to the overhead option include health, the environment, agriculture, homes, communities and tourism considerations.

**RESPONSE: Section 4** of this document sets out the manner in which EirGrid and the Project Team has/will respond to particular general issues raised (including health, environmental, agronomy, property, community and tourism related issues) as part of the progression towards a planning application.

# 2.12 SUBMISSION FS-11:

**Overview:** This submission by Monaghan Anti-Pylon Committee considers that the Preliminary Reevaluation Report makes no new findings, new issues or new insights. It considers that previous submissions to An Bord Pleanála, including at the Oral Hearing, by and on behalf of Monaghan Anti-Pylon Committee, community groups, landowners and individuals from County Monaghan are still valid.

#### Key points of the submission:

- 1. "The Anti-Pylon Committee have duly considered the Re-Evaluation Report and note that there are no new findings, new issues or new insights arising in the report".
- 2. "... we feel that all previous written submissions to An Bord Pleanála and oral hearing evidence given at the Oral Hearing by and on behalf of the Committee, community groups, landowners and individuals, from County Monaghan are still valid".

## **RESPONSE TO KEY POINTS:**

1. "The Anti-Pylon Committee have duly considered the Re-Evaluation Report and note that there are no new findings, new issues or new insights arising in the report".

**RESPONSE**: The Preliminary Re-evaluation Report is considered to clearly document the rationale for decisions taken which have resulted in largely the same route with some localised modifications being identified. Refer to **Section 2.3**, FS-2 - Point no. 1 and **Section 2.5**, FS-4 – Point no. 1 which provides EirGrid's full response to this issue.

2. "... we feel that all previous written submissions to An Bord Pleanála and oral hearing evidence given at the Oral Hearing by and on behalf of the Committee, community groups, landowners and individuals, from County Monaghan are still valid".

**RESPONSE:** EirGrid agrees that it is still valid to consider the submissions made to the Board in respect of the previous application for planning approval. As previously noted (also in **Section 2.3** in response to FS-2 – Point no.1) concerns and issues have been taken on board by EirGrid and its consultants arising from the Oral Hearing, and indeed the overall application in respect of the previous proposal.

# 2.13 SUBMISSION FS-12:

**Overview:** This submission by AMP/SAFE queries the authority of EirGrid to transmit electricity over private property. The key point to the submission is that *"It would appear that EirGrid do not have authority to transmit electricity over private property"*.

**RESPONSE:** EirGrid is the licensed Transmission System Operator (TSO) for Ireland pursuant to Section 14 of the Electricity Regulation Act 1999. Pursuant to Regulation 8(1)(a) the TSO has power to operate and ensure the maintenance of and, if necessary, develop a safe, secure, reliable, economical and efficient electricity transmission system.

# 2.14 SUBMISSION FS-13:

**Overview:** This submission seeks clarification of the information and facts that should be made available to both the public and impacted landowners.

#### Key points of the submission:

- 1. "Clarification in writing is required on the route selection methods employed by EirGrid in selecting the route section from Derryhallagh to Lemgare. The normal expectation would be that the shortest distance between two points is a straight line, however, in this instance there is a substantial kink or elbow formation which is out of context with the overall Northerly direction of the line. This kink has added in excess of 2.5 km to the length of the route requiring approximately seven more towers."
- Page 10 of EirGrid's Preliminary Re-evaluation Report sets out 'the route of the Interconnection Development shall be the shortest route that is technically and environmentally appropriate.' "The route passes over Cashel Bog, close to Tassan Lough NHA and Lemgare Rocks NHA".

- 3. "I disagree with the assertion that the height in Lemgare is lower than Crossmore".
- 4. "It is important to ensure full disclosure of all information and facts to both the public and landowners on why the line is going through their particular neighbourhood".

#### **RESPONSE TO KEY POINTS:**

1 "Clarification in writing is required on the route selection methods employed by EirGrid in selecting the route section from Derryhallagh to Lemgare. The normal expectation would be that the shortest distance between two points is a straight line, however, in this instance there is a substantial kink or elbow formation which is out of context with the overall Northerly direction of the line. This kink has added in excess of 2.5 km to the length of the route requiring approximately seven more towers."

**RESPONSE**: The route selection process in this area has had specific regard to balancing competing environmental and technical factors. Generally, in routing overhead lines, the key considerations are as follows:

- Distance to densely populated places;
- Visual impact;
- Protected or restricted ecological areas;
- Environmental impact;
- Technical standards;
- Topography;
- Cultural heritage;
- Road access;
- Geology and soils;
- Crossing with existing infrastructure; and
- Land use.

In terms of line routing, it is always an objective to achieve a relatively straight line between two defined connection points, taking into consideration environmental constraints and achieving the necessary technical standards. However, as a result of having to balance all the competing factors, OHLs often have to deviate from a straight line.

In this particular instance, the routing of the OHL in the area referred to in the submission is primarily designed to avoid the site identified as being the focal point of the Battle of Clontibret

(i.e. the area around where the monument/amenity area in Clontibret is situated). Whilst the battle site area is not defined in the County Development Plan or in historical publications, there is an amenity area at the crossroads west of Clontibret which provides a monument to the battle site and identifies this area as part of the site. The consequence of avoiding this historic site and associated public amenity area (which is considered an appropriate form of mitigation from an amenity and cultural heritage perspective) is the requirement for additional towers and a longer distance (i.e., the 'kink' rather than a straight line at this area of the route).

In terms of minimising potential impacts, in particular those associated with cultural heritage, the route section from Derryhallagh to Lemgare achieves this.

2. Page 10 of EirGrid's Preliminary Re-evaluation Report sets out "The route of the Interconnection Development shall be the shortest route that is technically and environmentally appropriate. The route passes over Cashel Bog, close to Tassan Lough NHA and Lemgare Rocks NHA".

**RESPONSE:** The key considerations when selecting an overhead line route are set out previously in point 1. Having regard to the balancing of all of the competing considerations, it is considered that the shortest route that is technically and environmentally appropriate is identified in the Preliminary Re-evaluation Report.

The specific locations referred to above are being considered in relation to the routing of the line, and in particular the location of towers, during the next stage of the project, and in the context of on-going technical and environmental studies.

#### 3. "I disagree with the assertion that the height in Lemgare is lower than Crossmore".

**RESPONSE**: When considered in the wider landscape context, the topography in the Lemgare and Crossmore areas appears to be similar in terms of elevation; however there are subtle differences when considered in a localised context and having regard to the routing criteria detailed in point 1 above.

Routing the OHL through Lemgare rather than Crossmore takes advantage of an area of lower ground along the Northern Ireland border between the townland of Lemgare and Coolartagh, thereby reducing visibility against the skyline. Having regard to the routing criteria detailed in point 1, if the OHL is routed through Crossmore it would be necessary to traverse an area of higher ground for a longer distance, thereby increasing its visibility against the skyline.

In summary, the route section from Derryhallagh to Lemgare is considered to minimise potential visual impacts by taking advantage of lower localised topography.

4. *"It is important to ensure full disclosure of all information and facts to both the public and landowners on why the line is going through their particular neighbourhood"* 

**RESPONSE:** EirGrid agrees. Indeed, the purpose of this re-evaluation process is to ensure that there is an understanding of, and confidence in, EirGrid's conclusions, and that is why this process provides for significant public and stakeholder input as well as an opportunity to provide inputs and suggestions on the routing of the line.

# 2.15 SUBMISSION FS-14:

**Overview:** This submission considers that EirGrid still have not gone far enough on the option to underground the proposal. It also raises concerns about a potential health hazard associated with overhead lines.

## Key points of the submission:

- 1. "We welcome that EirGrid have considered the public's opinion in this matter, they still have not gone far enough on the underground option".
- 2. "Living 80 metres from proposed overhead line would be a major health hazard...".

The submission concludes "We are not against progress, but we will continue to support NEPP, on the underground option".

## **RESPONSE TO KEY POINTS:**

1. "Living 80 metres from proposed overhead line would be a major health hazard as results of all studies done by NEPP show".

**RESPONSE:** EirGrid acknowledges the concerns that residents, living in proximity to the proposed overhead line, may have regarding the perception of negative health effects arising from human exposure to EMF. EirGrid's expert advice is that the 'studies' in question refer to a number of epidemiological studies that showed a weak link between certain cancers and EMF. The significance of these studies must however be understood in their proper context. Epidemiological studies with such weak statistical associations do not by their very nature provide proof of a real risk. All they can do is provide scientists with guidance on where they should direct their research.

Based on the findings of these epidemiological studies, extensive scientific research has been, and continues to be, carried out across the world in laboratories and in controlled experiments on live animals. Authoritative bodies such as the World Health Organisation, ICNIRP (International Commission on Non-Ionizing Radiation Protection) and the European Commission have reviewed the findings of this body of research and concluded that a link between the levels of EMF that would typically be emitted by an electricity transmission installation and negative health effects in humans and animals has not been established.

In addition the research has not been able to provide a biological explanation or identify a mechanism for how exposure to these low levels of EMF could cause damage to a living cell. Based on an analysis of this body of research the Chief Scientific Adviser to the Irish Government in his position paper "A Review of Recent Investigations into the Possible Health Effects of Exposure to Electromagnetic Fields (EMF) from Power Lines" (July 2010) concluded that it "is simply not possible for the level of energies associated with power lines to cause cancer".

EirGrid designs and operates the transmission network in accordance with all relevant health and safety guidelines. Based on all of the foregoing EirGrid can state with confidence that EMF from the proposed overhead line will not pose a health risk to the residents of existing dwellings in its proximity or to the wider community.

Further elaboration on this issue can be found at Section 3.5 of this document and **Section 4** of this document sets out the manner in which EirGrid and the Project Team has/will respond to particular general issues raised (including health) as part of the progression towards a planning application.

Additional information about electric and magnetic fields in Ireland can be found in "EMF and You", an EirGrid information brochure available from <u>www.eirgrid</u>projects.com.

2. "We welcome that EirGrid have considered the public's opinion in this matter, they still have not gone far enough on the underground option"

**RESPONSE:** Refer to **Section 2.2** and the response to FS-1 - Point no. 1 which addresses EirGrid's response to the underground alternative.

In conclusion, Chapter 3 of the Final Re-evaluation Report addresses this issue in the context of addressing the findings of the review of the International Expert Commission.

# 2.16 SUBMISSION FS-15:

**Overview:** This submission seeks clarity on the relationship between the proposed Interconnection Development, and the Government's strategic transmission infrastructure plans and wind development proposals and how they connect to the grid.

## Key points of the submission:

1. "... the interconnector is only part of Government plans which also include plans to install a total of 5,000 kilometres of cabling and 6,000 Mega watts of wind farms. Therefore the interconnector's stated purpose is to interlink Northern Ireland's electricity grid with that of the Republic's".

"Without knowing the stated aims and total plans I will be unable to make meaningful submissions to the interconnector planning application".

- 2. "I would like to know how the construction of the interconnector will impact on the wind development with regard to power lines from these wind farms to the point of connection to the grid. The planning application [for the windfarm] does not explain how the said windfarm [Corrinshigo/Raragh] will be connected to the Grid system or the direction that wind will take".
- 3. The submission concludes "I would ask that you engage with me on this and provide all relevant information. Aarhus convention refers".

## **RESPONSE TO KEY POINTS:**

1. "... the interconnector is only part of Government plans which also include plans to install a total of 5,000 kilometres of cabling and 6,000 Mega watts of wind farms. Therefore the interconnector's stated purpose is to interlink Northern Ireland's electricity grid with that of the Republic's".

"Without knowing the stated aims and total plans I will be unable to make meaningful submissions to the interconnector planning application".

**RESPONSE:** Chapter 2 of the Preliminary Re-evaluation Report records National policy that an additional high capacity electricity interconnector be established between the Republic of Ireland and Northern Ireland. This policy is specifically referenced in a number of policy documents as set out in the Report. The future application for approval of the proposed North-South 400 kV Interconnection Development will include a consideration of the relevant policy context for the development.

2. *"I would like to know how the construction of the interconnector will impact on the wind development with regard to power lines from these wind farms to the point of connection to the grid. The planning application* [for the windfarm] *does not explain how the said windfarm* [Corrinshigo/Raragh] *will be connected to the Grid system or the direction that wind will take"* 

**RESPONSE:** The Interconnection Development provides for the strategic transmission exchange of power flows over a large area of the island, and this will support the development of renewable power generation, primarily by providing increased capacity for transmission of renewable generation onto the grid. Wind farms primarily connect into the grid network at substation nodes – either existing or proposed. This occurs by way of connection agreements between EirGrid and the developer, which are outside the scope of this proposed development. The specific connection requirements for the Corrinshigo/Raragh windfarm will be to the distribution system and not the transmission system. Therefore EirGrid has no involvement and details of its connection are a matter for ESB Networks. It is also not of relevance for the North-South Interconnector. There are no windfarms directly to the proposed new North-South Interconnector.

3. "I would ask that you engage with me on this and provide all relevant information. Aarhus convention refers".

**RESPONSE:** All interested parties were invited, and continue to be invited, to participate in the consultation processes associated with this proposed Development. EirGrid is always willing to facilitate any engagement with the general public, landowners and all other stakeholders in respect of this, and all its projects, and will certainly accede to the request in this submission for continued engagement in respect of the proposed development.

The Aarhus Convention requires that the "public concerned shall be informed, either by public notice or individually as appropriate, early in an environmental decision-making procedure, and in an adequate, timely and effective manner..." and "The public participation procedures shall include reasonable time-frames for the different phases, allowing sufficient time for informing the public in accordance with paragraph 2 (The opportunities for the public to participate) above and for the public to prepare and participate effectively during the environmental decision-making."

Since the public launch of the project in October 2007, a lo-call phone line, email service, and postal service has been available to answer any questions or discuss concerns with the members of the public. This allows for optimum public participation, as addressed under the Convention. Moreover, there has been a statutory consultation process held in respect of the first application for approval and a subsequent consultation process in relation to the Preliminary Re-evaluation Report.

Furthermore there will be additional consultation opportunities in advance of the submission of the application for statutory approval to An Bord Pleanála.

## 2.17 SUBMISSION FS-16:

**Overview:** This submission by the Doohamlet District Community Development Association concludes that no changes are proposed to the route alignment that would address the concerns raised by the Association previously during the 2009/2010 application for approval (both written and oral). It also raises concerns in relation to the methodology for corridor evaluation used in the re-evaluation process.

#### Key points of the submission:

- 1. "The Re-evaluation Report does not allay any fears members of our community have in terms of the health implications, visual impact, impact on sustainable development and tourism development in our area, devaluation of property, the environmental impact, and impact on traffic and road safety in our locality".
- 2. "We note that further ecological studies have confirmed the importance of our locality for whooper swans and ..... yet the re-evaluation report gives no details as to how this species will be protected from the proposed development".

"... we believe that mitigation will include bird flight diverters which will be fitted to the power lines and will make the powerlines more intrusive in our landscape. We believe details of these measures should be included in any proposals to allow local people to make an informed decision in relation to the impact of the proposed development on our area".

- 3. "The fact that there are existing OH cables in the area does not justify the installation of new overhead cables".
- 4. "...although views in our area are not identified in the County Development Plan, it is not then appropriate or justified to run overhead cables through that landscape, particularly along the elevated sections of the landscape where pylons are proposed on top of drumlins".
- 5. "Para 7.3.2 [of the Re-evaluation Report] comparatively assesses route options with respect to impact on landscape. It states "Route Corridor Option A is the second longest route. It will have least visibility as it is located on less elevated underlying topography than Route Corridor Option B". We struggle to understand the meaning of this statement, as while the "underlying" topography of Option A may be lower lying, there are locations where the proposed pylons are greatly elevated, particularly along the proposed route west of our village".

"Further clarification and illustrated analysis is required in relation to the comparative route assessment and the selection of the preferred route in terms of landscape impacts".

"The DDCDA completely disagrees with an approach "based on professional experience and expertise" and without any quantitative or weighting system to route comparison, as there is no transparency to allow thirds parties review the final decision. Furthermore, it is not practical to consider all criteria examined as having the same importance, as some elements result in temporary impacts during the construction and reinstatement process, while others result in permanent and ongoing impacts which will not be mitigated against".

"We do not believe the comparative corridor evaluation is a robust or detailed enough analysis of all the issues and we [do] not believe the stated preferred route in [is] conclusively the preferred route".

6. It is submitted that "the Doohamlet District Community Development Association does not believe that EirGrid has illustrated that the proposed development is warranted in passing through our area and will not be detrimental to our area. We remain opposed to the proposed development of a 400 kV Interconnector through our locality".

#### **RESPONSE TO KEY POINTS:**

1. "The Re-evaluation Report does not allay any fears members of our community have in terms of the health implications, visual impact, impact on sustainable development and tourism development in our area, devaluation of property, the environmental impact, and impact on traffic and road safety in our locality".

**RESPONSE:** Section 4 of this document sets out the manner in which EirGrid and the Project Team has/will respond to particular general issues raised (including health, landscape and material assets (e.g., property)) as part of the progression towards a planning application.

2. "We note that further ecological studies have confirmed the importance of our locality for whooper swans and ..... yet the re-evaluation report gives no details as to how this species will be protected from the proposed development".

"... we believe that mitigation will include bird flight diverters which will be fitted to the power lines and will make the powerlines more intrusive in our landscape. We believe details of these measures should be included in any proposals to allow local people to make an informed decision in relation to the impact of the proposed development on our area". **RESPONSE:** The comments about further ecology studies and assertions that bird flight diverters may be fitted to the overhead line are also noted and will be taken into consideration during the preparation of the EIS that will accompany a future application for approval.

Where mitigation measures such as bird diverters are required, these will be developed in consultation with the National Parks and Wildlife Service (NPWS). Visual and any other impacts arising from bird flight diverters will be assessed in the EIS, thereby informing local people of the potential impacts.

3. "The fact that there are existing OH cables in the area does not justify the installation of new overhead cables".

**RESPONSE:** The Preliminary Re-evaluation Report's reference to the extent of existing OHL in the area was not intended as a justification for the installation of new lines; rather it is a statement of fact regarding the characteristics of the receiving environment within which the project will be located – new transmission infrastructure development must be considered in the context of the extent of existing transmission infrastructure, and other development, in an area.

4. "...although views in our area are not identified in the County Development Plan, it is not then appropriate or justified to run overhead cables through that landscape, particularly along the elevated sections of the landscape where pylons are proposed on top of drumlins"

and

5. "Para 7.3.2 [of the Re-evaluation Report] comparatively assesses route options with respect to impact on landscape. It states "Route Corridor Option A – is the second longest route. It will have least visibility as it is located on less elevated underlying topography than Route Corridor Option B". We struggle to understand the meaning of this statement, as while the "underlying" topography of Option A may be lower lying, there are locations where the proposed pylons are greatly elevated, particularly along the proposed route west of our village".

"Further clarification and illustrated analysis is required in relation to the comparative route assessment and the selection of the preferred route in terms of landscape impacts".

"The DDCDA completely disagrees with an approach "based on professional experience and expertise" and without any quantitative or weighting system to route comparison, as there is no transparency to allow thirds parties review the final decision. Furthermore, it is not practical to consider all criteria examined as having the same importance, as some elements result in temporary impacts during the construction and reinstatement process, while others result in permanent and ongoing impacts which will not be mitigated against".

"We do not believe the comparative corridor evaluation is a robust or detailed enough analysis of all the issues and we [do] not believe the stated preferred route in [is] conclusively the preferred route".

**RESPONSE:** Line routing requires consideration of often competing constraints. In considering routing options around the Doohamlet area the following competing constraints were identified:

- A requirement to avoid the high ground in Cornahoe and Carrickinare;
- A requirement to avoid Ballintra church and Lough Major;
- requirement to avoid Cremartin Village;
- A requirement to avoid Doohamlet Village;
- A need to optimize length of line straights (i.e. straight sections of the line);
- A need to minimise the number of road crossings; and
- Finding the optimal crossing point of the existing Lisdrum Louth 110 kV line.

In addition, it is noted that siting the line route in alternative locations in the area would raise other issues, for example:

- Siting the line route further west of Doohamlet would bring it closer to Ballintra Church and to Lough Major, as well as resulting in additional road crossings;
- Siting the line route in the area to the east of Doohmamlet would bring it closer to both Castleblayney and Muckno Lake; and
- Siting the line to avoid drumlins would introduce a considerable number of additional angle structures in the area (hence the line route crosses a more limited number of drumlins e.g., Terrygreehan and Cornaure).

Having regard to the views expressed in the submission, the following clarifies the meaning of the statements in the Preliminary Re-evaluation Report:

- The topography must be considered in conjunction with the potential for impacting on sensitive receptors which are detailed above.
- Whilst the submission outlines specific elevated areas in the vicinity of Doohamlet village and states that the OHL will traverse these areas, it should be noted that these areas are considered to be less visually sensitive when compared to those areas which are designated in the County Development Plan (CDP).
- The CDP sets out what a Planning Authority considers to be its most significant visually sensitive areas at a County level. Views not included in the County Development Plan are thereby not afforded any special or protected status. However, while the locations referred

to in the submission were not included as a specific constraint in the Preliminary Reevaluation Report, as they are not identified for protection in the CDP, the analysis of constraints for this project did incorporate a wider assessment of the landscape, and resulted in the most sensitive identified sensitive landscapes being avoided at corridor development and selection stages.

• The objective of OHL routing is to minimise visual impacts on those areas which are designated (i.e. considered by the CDP to be the most sensitive landscape areas) and Route Corridor A achieves this.

In light of the above, the identified indicative line route alignment is considered to comprise the most appropriate indicative alignment for the North-South 400 kV Interconnection Development. The subsequent process of route confirmation, including tower siting will be presented in a Preferred Project Solution Report, which will be published in due course, and will be the subject of a separate round of public consultation and engagement, in particular including landowner engagement.

In relation to the DDCDA disagreeing with the approach based on *"professional experience and expertise"* this has been previously addressed in detail under FS-2 Point 7.

In conclusion, greater clarity has been provided within the Final Re-evaluation Report as to the indicative line route presented in the Preliminary Re-evaluation Report.

The text relevant to paragraph 7.3.2 in the Preliminary Re-evaluation Report has been clarified in the final report regarding the evaluation process and outcome, and in particular the reasons as to why ecology and landscape became the focus when evaluating corridors. It is not considered that any amendments are required to the overall conclusions reached in the Preliminary Re-evaluation Report. The amended text is set out below:

"The study area generally consists of a uniform drumlin landscape overlain on a very gradual north-south ridge. There are scenic views and landscapes at a number of locations within the study area, the majority of which are associated with lakes, with the most significant views being in and around the Lough Muckno Primary Amenity Area, and views of Lough Egish from an upland area to the north-east. Additionally, there are views from upland areas including Lough an Lea Mountain, Mullyash Mountain and Kilkitt.

 Route Corridor Option A – Has the least potential to be visible and has the least potential for visibility from sensitive receptors, even though it passes close to two scenic routes near Lough Egish and Shantonagh Lough;

- Route Corridor Option B is located along the most elevated underlying topography of the three routes and will cause the most widespread visibility especially from portions of the N2, though it is the shortest route; and
- Route Corridor Option C passes closest to the most significant landscape resources i.e.
   Lough Muckno and the outskirts of Castleblayney".

### 2.18 SUBMISSION FS-17:

**Overview:** This submission objects to the proposal due to its proximity to residential properties. Particular concerns raised in the submission relate to health (EMF), visual impact and devaluation of property. It is submitted that EirGrid has adopted an intransigent policy with regards to undergrounding cables and that it is normal policy in other countries.

### Key points of the submission:

- 1. "The proposed power lines ... will be approximately 400 metres from our house and this is not acceptable for (a) health reasons, EMF and the studies outlining the dangerous health effects that have been conducted also (b) the visual impact that it will have on our home and (c) the devaluation of our property".
- 2. "These disgraceful pylons can be seen from our property, they can and should be put underground".

"EirGrid has adopted an intransigent policy with regards to under grounding these cables, yet in other countries it is normal policy".

"The people in Meath, Cavan and Monaghan do not want these power lines over ground...".

### **RESPONSE TO KEY POINTS:**

 "The proposed power lines ... will be approximately 400 metres from our house and this is not acceptable for (a) health reasons, EMF and the studies outlining the dangerous health effects that have been conducted also (b) the visual impact that it will have on our home and (c) the devaluation of our property".

**RESPONSE:** EirGrid's acknowledges that these issues are important to affected individuals (including landowners) and the public. **Section 4** of this document sets out the manner in which EirGrid and the Project Team has/will respond to particular general issues raised (including EMF

and visual impact) as part of the progression towards a planning application. Also refer to response provided in respect of FS-7 (point no. 2).

2. "These disgraceful pylons can be seen from our property, they can and should be put underground".

"EirGrid has adopted an intransigent policy with regards to under grounding these cables, yet in other countries it is normal policy".

"The people in Meath, Cavan and Monaghan do not want these power lines over ground...".

**RESPONSE:** Refer to **Section 2.2** and the response to FS-1, Point no. 1 which addresses EirGrid's full response to the underground alternative.

Furthermore, the Final Re-evaluation Report addresses this issue in the context of addressing the findings of the review of the International Expert Commission, the Report of the Joint Oireachtas Committee and the subsequent Government Policy Statement, in respect of the Meath-Tyrone 400 kV Interconnection Development.

### 2.19 SUBMISSION FS-18:

**Overview:** This submission includes a detailed critique of wind as a source of electrical power in Ireland and specifically argues that, while wind turbines provide a lot of energy, they provide very little power. It calls for a halt to further wind development pending an investigation by a panel comprising engineers, economists and experienced electrical distribution operatives.

### Key points of the submission:

- 1. "The Aarhus Convention is .... binding on Ireland with regard to projects which impact on the environment. This is such a project and the terms of the convention must be compiled with."
- 2. "There must be a study on the benefits of this project and alternatives must be specified ..... as the project is in part for the purpose of connecting windfarms, the expected contribution of them is relevant".
- 3. "A major issue is whether this project is necessary ..... there are several power stations in the midlands, yet there is no major industrial base in these areas".

### **RESPONSE TO KEY POINTS:**

1. "The Aarhus Convention is .... binding on Ireland with regard to projects which impact on the environment. This is such a project and the terms of the convention must be compiled with."

**RESPONSE:** EirGrid agrees. Refer to **Section 2.16** and the response to FS-15 - Point no. 3 which details EirGrid's response to matters relating to the Aarhus Convention.

2. "There must be a study on the benefits of this project and alternatives must be specified ..... as the project is in part for the purpose of connecting windfarms, the expected contribution of them is relevant".

**RESPONSE:** A summary of the strategic need, rationale and justification for the project is included in Chapter 2 of the Preliminary Re-evaluation Report. It must be understood that, in proposing a second North-South Interconnector, EirGrid is acting in accordance with its statutory obligations in implementing Government policy.

As outlined by the regulators in their joint report on the case for a second North-South Interconnector in 2004, the need / justification for the project is based on a number of factors including economic, technical and key stakeholder objectives. There is also a wide range of benefits associated with the interconnector that will ultimately benefit consumers and result in domestic savings. These include how investment in electricity infrastructure can reduce congestion on the network, improve productivity rates, increase economic growth rates, reduce long term maintenance and outage costs and facilitate renewable investment.

It should also be noted that Chapter 3 of the Preliminary Re-evaluation Report deals with the alternative technologies considered for the implementation of the development.

Furthermore, Chapter 2 of the Final Re-evaluation Report provides an update on the need and benefits of the project and Chapter 3 of the same report provides an update on the alternatives considered. These will also be matters to be addressed as part of the EIS associated with the new application for approval.

3. "A major issue is whether this project is necessary ..... there are several power stations in the midlands, yet there is no major industrial base in these areas".

**RESPONSE:** The need for the North-South Interconnector is set out in Chapter 2.0 of the Preliminary Re-evaluation Report. In this regard, the relevance of the reference to existing power stations in the Midlands is not clear.

### 3. RESPONSES TO LANDOWNER ENGAGEMENT AND PROPOSED AMENDMENTS ARISING

### 3.1 LANDOWNER FEEDBACK

As set out in **Section 1.2**, a specific programme of landowner engagement occurred in the context of the Preliminary Re-evaluation Report in May and June 2011. Feedback from this engagement primarily focused on site specific issues, including the project's potential impact on specific landholdings. However, during a number of the discussions between landowners and EirGrid's landowner agents, a number of queries and issues were raised that relate to this process of project re-evaluation. These are responded to below.

## 3.2 Issue 1 - Is there an actual need for the project given the economic downturn?

### **RESPONSE:**

The strategic 'all island' need for a second high capacity North-South 400 kV Interconnector is outlined in Chapter 2 of the Preliminary Re-evaluation Report. The Report confirms that the original justification for the second North-South 400 kV Interconnector was not based on forecasted growth in electricity consumption, which it is acknowledged has declined for the immediate short-term. Instead it was, and remains, driven by Government policy and certain EU Directives to facilitate strategic medium and longer-term growth. In addition, it must be understood that a relatively long time period is required to construct such transmission infrastructure – the envisaged timeframe for eventual operation of the proposed development is well beyond the considered period of short-term economic downturn. The imperative need to plan and construct the North-South 400 kV Interconnection Development to meet forecasted strategic need is immediate.

Chapter 2 of the Final Re-evaluation Report updates the strategic need, rationale, justification for and benefit of the proposed North-South 400 kV Interconnection Development.

### 3.3 Issue 2 - Could it run along a disused railway line

### **RESPONSE:**

Both EirGrid and its environmental consultants recognise the merits of utilising shared infrastructure corridors for linear developments (such as roads, railways, canals, pipelines and power lines, etc.).

The possibility of locating the proposed OHL development alongside the route of an existing disused railway in the Study Area was considered. However, it was ruled out after detailed study because *inter alia* it would direct the transmission infrastructure development into areas of population settlement, in particular Navan Town, as well as a number of villages and settlements.

Furthermore, at the time there was interest in re-establishing a rail link from Dublin to Navan and this was considered to most likely follow the route of the disused railway line from Clonsilla to Navan. It was an objective of the Meath County Development Plan 2007-2013 to keep "*the reservation of the former Dublin-Navan rail line free from development*" (Appendix A of the Meath County Development Plan 2007-2013).

The disused Navan railway line was subsequently formally selected as the preferred route alignment for the Dublin to Navan rail link by the Department of Transport. Phase I (providing a spur from the Maynooth line at Clonsilla to serve Dunboyne / Pace Interchange) was opened in September 2010. The preparation of the Railway Order application for Phase II (extending the service to Navan) was substantially completed but was deferred by the 'Infrastructure and Capital Investment 2012 – 2016 Medium Term Exchequer Framework' published in November 2011. Notwithstanding this, in the Meath County Development Plan 2013 – 2019, the National Transport Agency (NTA) *"indicated that it intends to formally request Meath County Council to include an objective in its Development Plan to protect and preserve the identified Navan Rail corridor once the NTA's draft transport strategy is adopted. Pending this, the NTA have requested that Meath County Council continue to protect the corridor free from development that might compromise the future delivery of the rail scheme to Navan."* 

### 3.4 Issue 3 - Why is the substation at Moyhill no longer deemed necessary?

### **RESPONSE:**

The rationale for why the substation in Moyhill is not included in the current application for planning approval is explained in Chapter 4 of the Preliminary Re-evaluation Report.

In summary, the report states that the 2009 application for approval proposed an intermediate substation (referred to in that application as Moyhill Substation) to reinforce the north-east for security of supply reasons. The need for this reinforcement was based on projected electricity demand in the region at the time. The latest revised demand forecasts published by EirGrid however indicate a longer and sustained depression of demand and a longer and slower recovery of growth than what

was previously estimated. As a result it is now envisaged that this intermediate substation will not be required within the next ten years. Consequently it would not be appropriate, in the context of proper planning and sustainable development, to include this element of the overall project in the new application for approval of the proposed North-South 400 kV Interconnection Development. At some stage thereafter electricity consumption in the north-east will however grow to a level that further reinforcement of the local transmission network will be required for security of supply reasons. At this point in time it is envisaged that such reinforcement will include the construction of the intermediate substation on the proposed Turleenan-Woodland 400 kV OHL that would connect it to the existing Flagford-Louth 220 kV OHL.

The fact that EirGrid is now of the opinion that the intermediate substation will not be required for at least ten years is significant as it is considered that it would not be appropriate, in the context of proper planning and sustainable development, for a developer to apply for planning permission for something which he does not expect to commence within ten years of receipt of planning approval. It is expected therefore that the intermediate substation will not be included in the planning application for the Interconnector but will instead be the subject of its own application (and environmental assessment) at a later date, when the need arises. However, given the possibility of this substation being proposed at some point in the future and the possibility that it may be in the vicinity of Kingscourt (but not necessarily at Moyhill) it is considered reasonable that an environmental impact assessment of the potential impacts arising from the possible future development of the intermediate substation should be included in the EIS as part of the consideration of potential impacts on the environment, including cumulative impacts, for the North-South Interconnector Development.

## 3.5 Issue 4 - Can EirGrid prove that no adverse health impacts will be associated with the project if it proceeds?

### **RESPONSE:**

EirGrid follows the guidance and instruction of international expertise and best practice. In this regard, an extensive worldwide risk assessment has been carried out by the World Health Organisation (WHO) and the International Commission on Non-Ionizing Radiation Protection (ICNIRP). The outcome of this risk assessment was the establishment, by ICNIRP in 1998 of *its 'Guidelines for limiting exposure to time-varying electric, magnetic and electromagnetic field (up to 300 GHz)*'. These Guidelines specify a 'reference level' of 100 microtesla for exposure of the general public to time-varying magnetic fields.

Both the WHO and the European Commission (EC) have endorsed these guidelines. The 1998 ICNIRP Guidelines form the basis of EU Council Recommendation 1999/510/EC which transcribes the EU Guidelines. The Irish Government has adopted the EU Guidelines without variation. EirGrid designs and operates the Irish Transmission network in accordance with the EU Guidelines. As with

all transmission infrastructure development in Ireland, the North-South 400 kV Interconnection Development will comply with these EU Guidelines.

In December 2010, ICNIRP published its new *Guidelines for Limiting Exposure to Time-Varying Electric and Magnetic Fields (1 – 100 kHz).* A Fact Sheet summarising the new Guidelines can be accessed on the ICNIRP website at <u>www.icnirp.de</u>. In the new Guidelines the specified 'reference level' for exposure of the general public to time-varying magnetic fields has been increased to 200 microtesla. In other words, this threshold has been raised.

The EU Guidelines have not been amended in accordance with the new ICNIRP Guidelines so they still refer to the lower reference level of 100 microtesla. EirGrid must still comply with these as they remain the official Guidelines in Ireland. The North-South 400 kV Interconnection Development will be designed accordingly in reference to this more conservative reference level.

Based on an analysis of the body of research into this matter by the European Commission, the Chief Scientific Adviser to the Irish Government in his position paper "A Review of Recent Investigations into the Possible Health Effects of Exposure to Electromagnetic Fields (EMF) from Power Lines" (July 2010) concluded that it "is simply not possible for the level of energies associated with power lines to cause cancer".

Dr William H Bailey, PH.D in his evidence to the oral hearing in respect of the previous application for approval for the North-South 400 kV Interconnection Development advised that *"The project EMF exposures from the proposed line are of low intensity and below reference levels recommended by ICNIRP and adopted throughout the European Union to protect public health where the public spend significant time"*. He concludes *"In conclusion, health and scientific agencies including the WHO and other agencies in Europe and Ireland have reviewed and evaluated research on the topic of EMF for the last 30 years. The conclusions of these assessments, which have followed a scientific process for the assessment of the research, are the same: the research does not support the conclusion that electric or magnetic fields are the cause of cancer, or any other long-term health effects."* 

In this regard, EirGrid will continue to follow the guidance and instruction of international expertise and best practice.

Additional information about electric and magnetic fields in Ireland can be found in "EMF and You", an EirGrid information brochure available from <u>www.eirgridprojects.com</u>.

### 3.6 Issue 5 - Why can the line not be put undergrounded?

### **RESPONSE:**

While an underground alternative may be the preference of many of the stakeholders who have engaged on the project to date; EirGrid has to be guided by its technical expertise and experience in this matter. Refer to **Section 2.2**, FS-1 – point no. 1 which sets out EirGrid's full response to this.

Furthermore, the Final Re-evaluation Report considers this issue in the context of addressing the findings of the review of the International Expert Commission and subsequent Government Policy Statement in respect of the Meath-Tyrone 400 kV Interconnection Development and the Government Policy Statement.

### 3.7 Issue 6 - Impacts on air space including flying aircraft?

#### **RESPONSE:**

There are two airfields in the study area: Trim Airfield located north-east of Trim, and Summerhill Airfield located north of Summerhill.

It is noted in respect of the previous application for approval for the North-South Interconnection Development, that the Irish Aviation Authority, in its submission to An Bord Pleanála, advised that it had "no observations on the proposals".

However, during the re-evaluation process a modification was made to the indicative line route near Trim Airfield that will provide an even greater extent of clearance margin outside of the approach surface which will allow a greater level of flexibility later on when siting towers along this stretch of the route.

# 3.8 Issue 7- Concerns for impact on agriculture, with a request that in order to minimise crop damage construction should only occur *"after the harvest*"?

### **RESPONSE:**

ESB, as the statutory body responsible for constructing the proposed development, will take every care during construction of the line to ensure that interference with farmers' operations and crop damage will be minimised or avoided altogether.

However, it must be acknowledged that ESB has considerable experience in the construction of electricity infrastructure over many decades, and fully understands the concerns of farmers and other directly affected landowners. All access for construction will be discussed and agreed with landowners in advance.

## 3.9 Issue 8 - Improvements on timing of landowner engagement, with a request for *"more time to review the information and literature"*

#### **RESPONSE:**

At all stages, EirGrid's objective has been to provide an accessible, meaningful, and accountable consultation process. In order to make the process as meaningful as possible for landowners, landowner agents generally seek to call to landowners as soon as possible after letters are sent out, in order to ensure that directly affected landowners have received the information and to answer queries. This was the strategy for landowner engagement which occurred in respect of the Preliminary Re-evaluation Report.

Landowner agents are available at all stages of the consultation to meet with landowners, so if landowners are unprepared when the landowner agent calls, they are available to reschedule and meet with them at another agreed time.

Further landowner engagement will occur during the next stage – Route Confirmation – of project development, and landowners will continue to have an opportunity to influence the siting of the alignment of the proposed development.

## 3.10 Issue 9 – Is the line route as indicated fixed, or is there an element of flexibility at this stage?

### **RESPONSE:**

There remains flexibility at this stage in the line route design process in terms of the location of towers.

EirGrid acknowledges landowner concerns in respect of the project's potential impact on specific landholdings; it continues to seek to allay concerns by reaching agreement with landowners on the specific location of towers, by seeking to proactively engage with landowners, to seek to site towers at locations which mitigate potential impacts on current farming practices and other land uses, while trying to balance other competing priorities such as environmental constraints and distance to dwellings.

As part of the detailed line design process, EirGrid will assess any suggested alternative localised amendments to determine the potential environmental impacts. Where these can be accommodated, without creating additional environmental impacts, they will be further considered. Where it is assessed that they would create additional avoidable significant environmental impacts, it is unlikely that they will be further considered or adopted. All localised assessments will form part of the ongoing EIA process.

### 4. RESPONSES TO OTHER ISSUES AND PROPOSED AMENDMENTS ARISING

### 4.1 OTHER ENGAGEMENT FEEDBACK

During, and subsequent to, the consultation on the Preliminary Re-evaluation Report, issues were raised by interested parties (collated from a variety of sources including written submissions, phone calls and meetings) which are not directly relevant to the Preliminary Re-evaluation Report. These issues however are of relevance to affected landowners and for the specific project design and Environmental Impact Assessment (EIA) stages in the project development process. A summary of the issues raised is set out in **Table 4.1.** The majority of these relate to the potential impact of the proposed development on environmental concerns.

Issue Reference	Issue	
l-1	Health	
I-2	Ecology	
I-3	Technology	
I-4	Material Assets	
I-5	Cultural Heritage	
1-6	Landscape	
I-7	Need	
I-8	Compensation	
I-9	Agriculture	
I-10	Noise	
I-11	Construction	
I-12	Water	
I-13	Geology	

 Table 4.1:
 Issues Raised During Other Engagement

It is evident from Chapters 5 – 9 of the Final Re-evaluation Report that environmental assessment work has informed the decision making process of the development of the project from an early stage. Further consideration of environmental issues is also a fundamental requirement of EIA. In this

regard, in accordance with European Union and Irish national law, it is considered that the North-South 400 kV Interconnection Development will require an EIA to be undertaken and, hence, an Environmental Impact Statement (EIS) will be required as part of the application for approval to An Bord Pleanála.

The particular focus of the route confirmation stage is a preferred line design; and the preferred line design for the North-South 400 kV Interconnection Development will be published in due course in a Preferred Project Solutions Report. With the identification of a preferred line design, the Project will be developed to a level of detail considered sufficient to allow EirGrid and its consultants to consider where significant impacts are likely to arise and those matters to be addressed / included in the EIS. Consultation with both statutory and non-statutory consultees, as well as the public during the reevaluation process, as well as knowledge gained from the previous planning application, means that this can be done with a reasonable degree of certainty.

The Preferred Project Solutions Report will therefore provide clarification on what EirGrid and its consultants determine to be the likely environment impacts arising from the proposed development. This will be set out under a series of environmental headings.

In respect to the other issues identified in **Table 4.1**, it is envisaged that the Preferred Project Solutions Report, will also provide a summary of the key construction works and activities associated with OHL in order to seek feedback from the public (and landowners in particular) on the proposed methodology, issues arising and construction related environmental considerations to be addressed in the EIS.

EirGrid would also refer interested parties to the Frequently Asked Questions (FAQ's) Sheets which have been developed for the North-South 400 kV Interconnection Development and which provide answers to a number of the most commonly asked questions on the Project.

### 5. CONCLUSIONS AND FEEDBACK

### 5.1 CONCLUSIONS

This report has set out a comprehensive summary of public, landowner and other stakeholder feedback arising from consultation that has occurred in respect of the Preliminary Re-evaluation Report (and other engagement) concerning the North-South 400 kV Interconnection Development. The Terms of Reference of this Report are set out at **Section 1.3** of this Report.

This Report sets out the response of EirGrid and its consultants to the consultation feedback received in respect of the Preliminary Re-Evaluation Report and otherwise. It also sets out any consequent amendments that have been made to the Final Re-evaluation Report. Of particular note, this Report has acknowledged that the International Expert Commission (IEC) review on a case for, and cost of, undergrounding all or part of the Meath-Tyrone 400 kV Interconnection Development, and the subsequent Joint Oireachtas Committee on Communications, Natural Resources and Agriculture report on its consideration of the IEC review, were both published outside the formal period of public consultation in respect of the Preliminary Re-evaluation Report. This is also the case with the subsequent Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure. The findings of the IEC review, the subsequent JOC report, and the Government Policy Statement, have been considered in the Final Re-evaluation Report.

A number of issues were raised and documented in this report which it was considered should be better clarified in the Final Re-evaluation Report by means of additional or revised explanatory text; this has occurred in the final Report. However, no issues were identified that would alter the recommendation of EirGrid and its consultants that the identified Route Corridor Options A and 3B remain the least constrained (and thereby preferred) options, from a technical, environmental and community perspective, for the North-South 400 kV Interconnection Development.

In addition, no issues were identified that would significantly alter the general alignment of the indicative line route within Route Corridor Options A and 3B as identified in the Preliminary Reevaluation Report. There have been a number of localised modifications to the indicative alignment, arising from *inter alia* the process of landowner engagement in respect of the Preliminary Reevaluation Report.

It needs to be understood, however, that this is only an indicative alignment, for the purposes of ongoing technical and environmental analysis, and public and landowner consultation and engagement. Issues relating to the specific alignment of the planned circuit, including potential local modifications to the alignment, are more appropriately associated with, and thereby addressed by, the process of route confirmation and environmental impact assessment which will occur subsequent to this re-evaluation process, in consultation with landowners and other stakeholders. The particular focus of this subsequent stage of route confirmation will comprise the preferred line design of the North-South 400 kV Interconnection Development which will be published in due course in a Preferred Project Solutions Report. As such, while these issues are of clear concern, both to EirGrid, directly affected landowners, and other parties, they are not matters that are most appropriately resolved in this re-evaluation process.

### APPENDIX D

Community Update Brochure (April 2013)



### North-South 400kV Interconnection Development

## **Community Update**

April 2013



Part Funded by the EU-TEN-E Initiative



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Re-evaluation of the North-South 400kV Interconnection Development concludes with the publication of the Final Re-evaluation Report



### **Overview**

EirGrid and Northern Ireland Electricity (NIE) are jointly planning a major cross-border electricity scheme. This scheme is a 400kV overhead line linking the existing 400kV substation in Woodland, County Meath with a planned substation in Turleenan, County Tyrone and will provide a second high capacity electricity transmission line between Ireland and Northern Ireland. The scheme consists of two separate but related and complementary projects. EirGrid will in due course apply for planning approval for that part of the scheme located in Ireland called the North-South 400kV Interconnection Development.

### **Project Drivers**

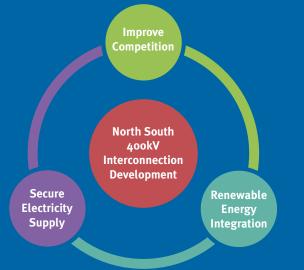
The key drivers for this project are to:

- Improve competition in the electricity market This project will improve the efficiency of the all-island electricity market
- Ensure a secure supply of electricity for the island of Ireland

This project will enhance the security of the electricity supply throughout the island of Ireland which is essential for economic growth, the creation of jobs and improving the standard of living and quality of life for all

• Help Ireland meet its 40% renewable electricity target

This project will allow more renewable energy to be connected to the network, reducing our production of greenhouse gases and our reliance on imported fossil fuels



While each of these key drivers on their own creates a definite need for the project, combined they create an overwhelming and urgent need.

### What has happened so far?

This project was first launched in autumn 2007 and an application for planning approval was submitted to An Bord Pleanála in December 2009. This application was withdrawn in July 2010.

Since the withdrawal of the application, EirGrid has been engaged in the process of undertaking a comprehensive re-evaluation of the project. This involved, among other things, a thorough re-examination of the previous application, including issues raised during the previous application process. In May 2011, EirGrid published its interim findings as set out in a Preliminary Re-evaluation Report, which was subject to consultation.

The consultation requested feedback on the content and findings of the Preliminary Re-evaluation Report and included engagement with the public and landowners on the indicative line route.

## The consultation on the Preliminary Re-evaluation Report included:

- The strategic need for the project.
- Technology options for the project.
- Project study area.
- Environmental and other constraints.
- Identification of corridor options.
- Identification of the preferred corridor.
- Identification of an indicative line route within the preferred corridor.

### **Government Review**

A separate review process was undertaken by the Department of Communications, Energy and Natural Resources (DCENR), whereby an International Expert Commission (IEC) reported on the case for, and cost of, undergrounding the North-South 400kV Interconnection Development.

This report was published in January 2012 and recommended the interconnector should not be undergrounded using Alternating Current (AC) cable. However, this report also stated that if undergrounding is to be used, the best technology option currently available is Direct Current (DC). The report estimated that using this technology would cost up to three times more than the standard overhead line solution.

Following a period of consultation, a Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure was published in July 2012. This policy statement recognised this project as one of a group of projects that are "vital developments for the regions and for the economy and society as a whole". It also emphasised the importance of early and ongoing consultation to help identify appropriate mitigation measures such as the reconfiguring or rationalising of existing networks, and the development of a community gain programme.

## Conclusion of EirGrid's project re-evaluation

EirGrid has completed its re-evaluation process and published the Final Re-evaluation Report. The re-evaluation process has considered and responded to the following:

- Stakeholder feedback from the previous planning application.
- Stakeholder feedback from the Preliminary Re-evaluation Report consultation.
- The outcome of the Government Review.

The key findings of the project re-evaluation are, that there remains an urgent strategic need for the project. Following EirGrid's consideration of the findings in the IEC report, using DC technology would be technically inferior for this project compared to a standard AC overhead line solution and EirGrid agrees with the IEC that this option would be vastly more expensive.

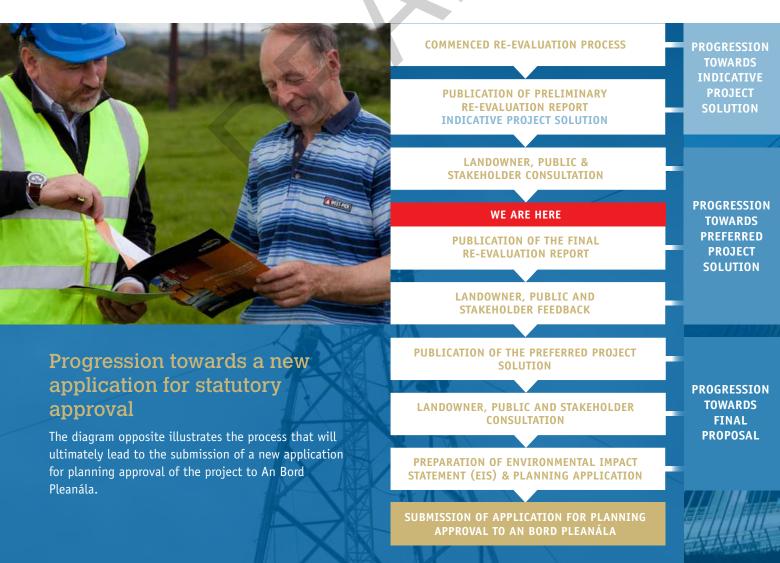
On this basis EirGrid is proposing that the new Interconnector circuit will generally take the form of a single circuit 400kV AC overhead line. The indicative line route for this overhead line is broadly similar to the previously proposed line route, but incorporates localised modifications as follows:

- Modifications to the line route in order to take account of the construction and granting of permission for new houses occurring since the preparation and submission of the previous application in December 2009.
- Modification arising as a result of the decision not to proceed with an intermediate substation (in the area to the west of Kingscourt) as part of this forthcoming application for approval of the Interconnection Development.
- Modifications arising from technical and environmental considerations during the re-evaluation process.

### EirGrid welcomes your views

EirGrid is fully committed to engaging extensively with landowners, members of the public and other interested parties on all aspects of the project at any time. It is vital that everyone has an opportunity to provide feedback on the information presented and decisions that are made as the project progresses towards a planning application.

We encourage you to participate by writing to us, calling us, dropping into one of our information centres



or attending a project open day in Meath, Cavan or Monaghan. We welcome your comments on the Final Re-evaluation Report and your views on whether all issues have been considered as part of the re-evaluation process. If not what other issues do you think EirGrid should consider?

All feedback and submissions will be reviewed and considered by the project team and where appropriate will be incorporated into later stages of the project. To enable this, all feedback should be received by Monday, May 27th 2013.

EirGrid is also seeking your feedback on how best to adopt community gain within transmission project developments and the Grid25 programme in general. You can give your views on community gain by contacting the project information service or using the dedicated feedback form attached to this brochure.

### What's happening now?

EirGrid is holding a series of information days on the project. We invite all interested members of the public and other stakeholders to attend these open days to meet with the project team, learn more about the project and give your feedback.

Date	Time	Location
Tuesday April 23rd 2013	1pm – 8pm	<b>Town Hall</b> Cavan Town Co. Cavan
Wednesday April 24th 2013	1pm – 8pm	<b>Town Hall</b> Cavan Town Co. Cavan
Thursday April 25th 2013	1pm – 8pm	The Workhouse Shercock Road Carrickmacross Co. Monaghan
Friday April 26th 2013	1pm – 8pm	The Workhouse Shercock Road Carrickmacross Co. Monaghan
Monday April 29th 2013	1pm – 8pm	<b>Navan Education Centre</b> Athlumney, Navan Co. Meath
Wednesday May 1st 2013	1pm – 8pm	Navan Education Centre Athlumney, Navan Co. Meath

### What happens next?

Following the completion of this period of consultation, EirGrid will consider all feedback received before finalising its preferred project solution. The preferred project solution will be published in the coming months, which will be the subject of a further period of public consultation.

This consultation will focus on the:

- Preferred line design, this will include the line route, preferred structure and tower locations.
- Methodology for siting and construction of towers.
- Environmental issues to be addressed in the Environmental Impact Statement (EIS).



## Feedback -Community Gain



The **Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure** published in July 2012 "underlines the imperative [...] and the appropriateness of building community gain consideration into project planning and budgeting and as an intrinsic part of the ongoing consultation with local communities and local authorities."

EirGrid is currently considering how best to adopt community gain within transmission project development and the Grid25 programme in general. EirGrid is seeking your views on the following:

Who Who should receive community gain?

Who should be included in the "community" on transmission projects?

What What initiatives should be eligible for community gain support ie. sports, arts, education?

What do you define as "gain" for your community e.g. mitigation measures such as compensatory undergrounding\* or a fund for local community groups?

- When At what point in a project should community gain be considered? At what point in a project should community gain be available?
- **How** How should community gain be managed?

How should community gain be distributed, what criteria should be used and who should define that criterion?

### **Submit Your Views**

You are welcome to submit your views on additional pages.

Return to : c/o Grid25 Manager, Block 2, Floor 2, West Pier Business Campus, Dún Laoghaire, Co. Dublin.

\* Compensatory undergrounding is the undergrounding of lower voltage lines in an area where an overhead high voltage circuit is planned.



### **About EirGrid**

EirGrid, a state-owned company, is the national operator of the electricity transmission grid.

The national transmission grid is an interconnected network of high voltage power lines and cables, comparable to the motorways, dual carriage ways and main roads of the national road network. It is operated at three voltage levels; 400kV, 220kV and 110kV and is approximately 6,400km in overall length within Ireland.

It is the backbone of Ireland's electricity system and is vital to ensuring that all industrial, commercial and residential customers from both rural and urban areas have a safe, secure, reliable, economic and efficient electricity supply.

### **Contact Details**

### Write: c/o EirGrid NS Project Manager,

Block 2, Floor 2, West Pier Business Campus, Dún Laoghaire, Co. Dublin, Ireland. Phone: Lo-call **1890 25 26 90** (9am to 5pm Monday to Friday)

### Email: northsouth@eirgrid.com

**Website:** http://www.eirgridprojects.com/projects/ northsouth400kvinterconnectiondevelopment

#### **Visit Information Centres:**

Navan Every Tuesday from 12 noon to 7pm 10a Kennedy House, Kennedy Road, Navan, Co. Meath.

#### Carrickmacross

Every Wednesday from 12 noon to 7pm Carrickmacross Workhouse, Shercock Road, Carrickmacross, Co. Monaghan.

#### Kingscourt

Every Thursday from 12 noon to 7pm Dun A Ri House Hotel, Station Road, Kingscourt, Co. Cavan.





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Grid25 is EirGrid's ongoing development plan to deliver a sustainable, competitive and secure electricity supply to homes, business and industries. Grid25 will also help us meet our target of 40% of our energy supply coming from sustainable Irish sources.

### APPENDIX E

Chapter 2 of the Preferred Project Solution Report

The Final Re-evaluation Public Engagement Report

### 2 PUBLIC AND STAKEHOLDER ENGAGEMENT

### 2.1 INTRODUCTION

The overarching purpose of stakeholder consultation and engagement is to ensure that all people who are likely to be affected by a project, potentially affected by a project, or consider themselves to be affected by a project have an opportunity to meaningfully feed into its development, as appropriate.

EirGrid is committed to open and transparent engagement with stakeholders on all of its infrastructure development projects, including the North-South 400 kV Interconnection Development. EirGrid welcomes feedback from interested parties on any aspect of the project and all submissions received are recorded and considered by the project team.

Following the withdrawal of the previous application for approval in respect of the North-South 400 kV Interconnection Development Project in July 2010, EirGrid undertook a comprehensive re-evaluation of the project. The re-evaluation process included an eight week period of public consultation on the content and findings of a Preliminary Re-evaluation Report in May 2011. Having allowed sufficient time for the Independent Expert Commission (IEC) review on the cost of undergrounding all or part of the North-South 400 kV Interconnection Development and the associated Joint Oireachtas Committee hearing, EirGrid concluded this review process in April 2013 with the publication of the *Final Re-evaluation Report*. Submissions received during the public consultation on the *Preliminary Re-evaluation Report* and observations and submissions in respect of the previous application for approval, along with the findings of the IEC Review, the Government Energy Policy statement and the Joint Oireachtas Committee consultation, were considered by the project team as part of the re-evaluation process.

It was deemed appropriate to allow for an additional period of structured engagement on the content and findings of the *Final Re-evaluation Report* before moving to the next stage of the project having consideration for:

- i) The time lapse between the *Preliminary* and *Final Re-evaluation Report*,
- ii) The addition of new information to the *Final Re-evaluation Report* in light of the IEC Review; and
- iii) Request from a representative group for additional engagement on the findings of the reevaluation process.

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This project has a unique planning context and has been the subject of extensive and comprehensive public and stakeholder consultation activities since it launched in autumn 2007. Submissions received as part of earlier consultations, including those received on the *Preliminary Re-evaluation Report* and during the previous application for planning approval, contained specific issues relating to the line design, including potential localised modifications to, or siting of, the alignment. The essential elements of these submissions are set out in **Section 2.3**.

### 2.2 PUBLIC ENGAGEMENT ON THE FINAL RE-EVALUATION REPORT

Following the publication of the *Final Re-evaluation Report*, EirGrid held a six-week period of public engagement (between 16<sup>th</sup> April 2013 and 27<sup>th</sup> May 2013) on the contents of that report.

The terms of reference for this engagement were:

- Comment on the content and findings of the Final Re-evaluation Report.
- Has EirGrid considered all relevant issues as part of the re-evaluation process? If not what other issues do you think EirGrid should consider?
- Provide feedback on how best to adopt community gain within transmission project developments and the North-South 400 kV Interconnection Development.

EirGrid is grateful to the parties and persons who took time to provide submissions in writing, via the project information service or by attending one of the nine open days held during this period of engagement on the contents and findings of the *Final Re-evaluation Report*. These submissions have been considered by the project team.

### 2.2.1 Overview of Communications Activities

A range of communication tools were used to facilitate as wide an engagement as possible. Interested parties were invited to participate via the project information centre network and service, at one of nine project information events, or at a pre-arranged project briefing.

### 2.2.1.1 Information Centre Network & Service

A comprehensive project information service has been in operation since autumn 2007 and facilitates all interested parties in contacting the project team to provide feedback or obtain information about any aspect of the project. This service can currently be availed of through the project phone line which is open between 9am and 5pm, Monday to Friday (Lo-call 1890 25 26 90); online at <u>northsouth@eirgrid.com</u> or via traditional mail at: C/O EirGrid NS Project Manager, Block 2, Floor 2, West Pier Business Campus, Dun Laoghaire, Co. Dublin.

Since 2008, EirGrid has had two established information centres, one in Navan, County Meath and one in Carrickmacross, County Monaghan. As part of this most recent round of engagement, EirGrid has expanded the information centre network with the addition of a new information centre in Kingscourt, County Cavan.

The information centres are staffed by project team members who are available to meet with anyone who wishes to visit the centre during the advertised opening hours (see **Table 2.1**). If any stakeholder requires a meeting with the team outside of these hours, every effort is made to accommodate that request.

Table 2.1	Information Centre Locations and Opening Hours
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Centre	Address	Opening Hours
Navan Information Centre	10a Kennedy House, Kennedy Road, Navan, Co. Meath	Tuesday 12 noon to 7pm
Carrickmacross Information Centre	Carrickmacross Workhouse, Shercock Road, Carrickmacross, Co. Monaghan	Wednesday 12 noon to 7pm
Kingscourt Information Centre	Dún a Rí House Hotel, Station Road, Kingscourt, Co. Cavan	Thursday 12 noon to 7pm

### 2.2.1.2 Open Days

In order to provide all interested parties with an opportunity to obtain information about the project and meet with a variety of technical experts from the project team, a series of six open days, as detailed in **Table 2.2**, were planned and held during the engagement period. Following a request from Monaghan Anti-Pylon Committee an additional three open evening events were held in County Monaghan (detailed in **Table 2.2**).

Members of the project team were available at each open day to engage with members of the public and answer any queries or questions that might arise. As far as possible the project team endeavoured to capture the views and feedback provided by stakeholders during these events.

At each event technical experts were available to provide stakeholders with information on the following topics:

- Technology options;
- Electric and magnetic fields (EMF);
- Planning;
- Environmental matters including ecology and archaeology; Line design; and
- Landowner engagement including compensation, impact on land use and farming practices.

Tailored information displays were prepared by the project team for these events. The displays focused on providing information on the key findings of the *Final Re-evaluation Report*.

Technical experts used detailed mapping of the indicative line route, available at a 1:10,000 and 1:25,000, to provide stakeholders with specific information on the proximity of the line route to their particular areas of interest.

The details of the open days are outlined below in Table 2.2.

Venue	Date and Time
Town Hall, Cavan Town	Tuesday, April 23 <sup>rd</sup> 2013, 1pm – 8pm
Town Hall, Cavan Town	Wednesday, April 24 <sup>th</sup> 2013,1pm – 8pm
The Workhouse, Shercock Road, Carrickmacross	Thursday, April 25 <sup>th</sup> 2013, 1pm – 8pm
The Workhouse, Shercock Road, Carrickmacross	Friday, April 26 <sup>th</sup> 2013, 1pm – 8pm
Navan Education Centre, Athlumney, Navan	Monday, April 29 <sup>th</sup> 2013, 1pm – 8pm
Navan Education Centre, Athlumney, Navan	Wednesday, May 1 <sup>st</sup> 2013, 1pm – 8pm
Cremartin GAA Centre, Castleblayney	Tuesday, May 22 <sup>nd</sup> 2013, 4.30pm – 8.30pm
Aughnamullen GAA Social Centre, Carrickmacross	Wednesday, May 23 <sup>rd</sup> 2013, 4.30pm – 8.30pm
Corduff-Raferagh Community Centre, Carrickmacross	Thursday, May 24 <sup>th</sup> 2013, 4.30pm – 8.30pm

### 2.2.2 Public Engagement Approach

To facilitate members of the public and other parties participating in this round of engagement the following information was made available to all interested parties at the commencement of this round of engagement:

- A Community Update brochure, containing details of the IEC review, key findings of the project reevaluation process, terms of reference for this engagement period and contact and event details. This was issued at the commencement of this stage of engagement as detailed in Section 2.2.2.1 and was made available at the project open days, project website and information service;
- 1:25,000 mapping showing the indicative line route in the CMSA and MSA was made available on the project website, at the project information centre network, at the project information days and

upon request via the project information service. Bespoke maps were prepared and provided to stakeholders upon request;

- The *Final Re-evaluation Report* and associated appendices was available for inspection at the project information centre network and information days. The report was available on the project website and copies were provided upon request. In addition copies of the report were provided to the County Librarian in Meath, Cavan and Monaghan for display in their branches; and
- A frequently asked questions document was produced and made available on the project website. Copies of this document were also available from the project information service.

### 2.2.2.1 Proactive Engagement

A letter inviting participation in this stage of engagement and enclosing a community update brochure was sent to all the following groups of stakeholders:

- Elected members;
- Statutory and prescribed bodies;
- National representative groups;
- County representative groups;
- Local, business and community groups within 5km of the indicative line route;
- Members of the public including observers in respect of the 2009 application; and
- Landowners along the line route.

In addition, where contact details were available organisations and elected members were proactively contacted by phone or email.

### 2.2.2.2 Publicising the Engagement Process

Every effort was made to ensure that as many people as possible were made aware of the project and had an opportunity to participate, this was achieved through a combination of news releases to national and local print, broadcast and electronic media, placing seven advertisements in local press and 80 advertisements on local radio stations, and on-line on the EirGrid website.

### 2.2.3 Submissions Received

The submissions received have been reviewed and considered by the project team. The number and nature of submissions are detailed in **Table 2.3**.

Table 2.3	Number and Nature of Submissions Received on Final Re-evaluation Report
l able 2.5	Number and Nature of Submissions Received on Final Re-evaluation Report

Method of Stakeholder Feedback	Number of Submissions
Project Briefing	18
Information Centres & Telephone Line	22
Written submissions (including email)	58
Open Days (Series 1) <sup>2</sup>	70
Open Evening Events (Monaghan) (Series 2) <sup>3</sup>	500
Total	668

For the purposes of this report the issues raised by stakeholders have been grouped as listed below:

- Submissions received from prescribed bodies on the Final Re-evaluation Report,
- Submissions relevant to the Final Re-evaluation Report,
- Submissions relevant to the Preferred Project Solution Report and subsequent stages;
- Submissions on other issues; and
- Submissions on community gain.

A detailed summary of submissions received is included in **Appendix C** and the high level summary and EirGrid's response to these is included, as appropriate, in the following sections.

### 2.2.4 Submissions Received from Prescribed Bodies on the Final Re-evaluation Report

Submissions from engagement with prescribed bodies on the *Final Re-evaluation Report* were collated from written submissions and meetings. The key points raised in written submissions are summarised in **Table 2.4**. It should be noted that engagement with prescribed bodies is on-going.

<sup>&</sup>lt;sup>2</sup> This number is based on the number of attendees who registered their presence at the events.

<sup>&</sup>lt;sup>3</sup> This number is based on the number of attendees who registered their presence at the events.

### Table 2.4 Key Points Raised by Prescribed Bodies on the Final Re-evaluation Report

Prescribed	Key Points Raised	Response
Body		
National Roads Authority (NRA)	The indicative route traverses a number of national roads (M3 as well as the N2) and national secondary roads (N51 and N52). It also traverses the line of the Leinster Orbital Route (LOR) which is currently at feasibility stage. The LOR is supported in the Meath CDP, the GDA RPGs 2010-2022 and the NTA's GDA Draft Transport Strategy 2011-2030. The NRA acknowledged that the previous application examined the inter-relationship of the proposed North-South 400 kV Interconnection	Consultations were undertaken with the NRA in relation to the preferred line route and possible crossings of the M3, N2, N51 and N52, in addition to the Leinster Orbital Route which is currently at feasibility stage. Further consultation was undertaken with the M3 Concession Company in relation to the M3. These roads were therefore taken into consideration for the preferred line design and engagement with both bodies will continue during the process of finalising the line design and preparation of the EIS.
	Development and the LOR. The NRA recommends that EirGrid re-examines the inter-relationship between the two infrastructure projects to take into account any alterations or modifications to the revised North-South 400 kV Interconnection Development for the LOR. The NRA also requests that EirGrid gives consideration to the following matters:	
	<ol> <li>Identify the methods/techniques employed in traversing the existing national road network to ensure that the safety and standards of the national road network is maintained through appropriate best practice construction methods.</li> <li>Ensure that proposed works do not impinge on</li> </ol>	(1) The stringing of conductors across the national road network will be carried out in accordance with IEEE Std 524-1992 Guide to the Installation of Overhead Transmission Line Conductors incorporating a proven work methodology, which ensures that there is no significant effect on the safe passage of traffic on these roads.
	the M3 Motorway and the Concession Operator; the NRA recommends that both the NRA and the M3 Concession Company are consulted during the development of the project concerning works proposed to be undertaken in proximity to the M3.	(2) and (3) As noted above, consultation will be undertaken with both the NRA and M3 Concession Company representatives during the process of finalising the line design and preparation of the EIS. Such consultation will address the satisfactory clearances between the finished surface of the M3 and the overhead
	(3) Ensure that the detailed scheme design provides sufficient clearance to facilitate the construction of the future LOR.	conductor, at the crossing point. As matters stand, the intersection point remains unchanged from that of the previous scheme.
Inland Fisheries Ireland	The Inland Fisheries Ireland (IFI) comment that the proposed powerline passes through a number of river catchments such as the River Tolka, Boyne, Dee, Glyde, Erne, Dromore, and Fane catchments many of which contain valuable fishery habitat with	EirGrid confirms that river catchments were considered as part of the re-evaluation process, and will continue to be a consideration in the preparation of an EIS.
	many of which contain valuable fishery habitat with stock of salmonid and coarse fish; noting that a number are protected under the Habitats Directive including Salmon and Lamprey.	<b>Chapter 6</b> of this report identifies, in general terms, the type of issues which will be considered in the EIS, the nature of the assessment of impacts in respect of those particular issues and
	The IFI observe that in the event that there will be works in or near watercourses that EirGrid is directed to the Guidelines entitled ' <i>Requirements for</i> <i>the Protection of Fisheries Habitat during</i>	the potential associated environmental effects. The potential impact on water quality and fisheries will be assessed as part of the EIS and the wider EIA process.

Prescribed Body	Key Points Raised	Response
	Construction and Development Works at River Sites.' [published by the Eastern Regional Fisheries Board]. The aim of which is to identify the likely impact on fisheries habitat in the course of construction and development work, and to outline practical measures for the avoidance and mitigation of damage. The IFI are seeking to be kept informed of the proposal and would welcome the opportunity to comment further when more details are available.	EirGrid and its consultants have endeavoured to identify a preferred alignment which avoids or minimises works in or near watercourses. However, in preparing the application for approval and EIS, EirGrid will incorporate the provisions of the guidance document ' <i>Requirements for the</i> <i>Protection of Fisheries Habitat during Construction</i> <i>and Development Works at River Sites</i> ' produced by the Eastern Fisheries Board.
		EirGrid will keep IFI informed at all stages of the project, and will consult with them prior to lodgement of the application.
Geological Survey of Ireland,	The Geological Survey of Ireland (GSI) notes some clarifications in relation to the designation of geological heritage sites:	EirGrid confirms that designation of geological heritage sites was considered as part of the re- evaluation process, and will continue to be a consideration in the preparation of an EIS.
	<i>'recommended for NHA designation'</i> as the GSI is in the process of compiling a list (which is not finalised) of sites proposed for designation as	In this regard, <b>Chapter 6</b> of this report identifies, in general terms, the type of issues which will be considered in the EIA, the nature of the assessment of impacts in respect of that particular
	The GSI note that they have also determined a secondary list of County Geological Sites (CGS) listed in Appendix 13b of the Meath CDP 2013-2019 and related chapter 9.7.7 (policy NH POL 12 refers).	issue and the potential associated environmental effects. The potential impact on soils, geology and hydrogeology will be comprehensively considered in the EIS and assessed as part of the EIA process, and this will include consideration
	Within the MSA the GSI identifies two CGS (Altmush stream CGS & Boyne River CGS) which Route 3B-MSA traverses. The GSI comments that the features of interest are unlikely to be affected by	and assessment of potential impacts on geological heritage sites (including those recommended for NHA designation).
	works. A further two sites of interest are noted (Galtrim Morraine CGS & Nobber CGS) by the GSI who consider that no impacts are anticipated.	EirGrid will keep the GSI informed at all stages of the project.
	The GSI recommend that they be contacted during the line design phase for mitigation measures, if applicable.	
Border Regional Authority	The Border Regional Authority draws the attention of EirGrid to Section 5.4.2.7 of the Regional Planning Guidelines and, in particular, the entire context and wording of policy INFP23, which states that Development Plans 'should facilitate the provision of energy networks in principle' subject to meeting a number of environmental and technical criteria.	It is noted that Policy INFP23 notes that Development Plans 'should facilitate the provision of energy networks in principle' subject to meeting a number of environmental and technical criteria. <b>Chapter 6</b> of this report identifies, in general terms, that planning policy issues (including regional planning guidelines) will be considered in the EIS.
	It is noted that the Sinn Fein members of the Border Regional Assembly also made a submission (dated the $20^{th}$ of May 2013). This is incorporated into the general feedback received in <b>Appendix C</b> .	Engagement with the regional authority will continue during the process of finalising the line design and preparation of the EIS.

### 2.2.5 Submissions from Other Stakeholders on the Final Re-evaluation Report

A number of submissions raised issues that were of relevance to, or in response to, the *Final Re-evaluation Report.* The issues are set out in **Appendix C** of this report and are grouped under three main headings as follows:

### 1. Project Need/Scope

A number of submissions made observations and provided feedback in respect of the need for the project. Examples of the issues raised are set out in **Appendix C (Section 2.1)**.

**Response:** Project need is adressed in Chapter 2 of *The Final Re-evaluation Report.* The chapter sets out why the proposed second north-south electricity interconnector (the "Scheme") is a critical and strategically urgent transmission reinforcement on the island of Ireland. The chapter provides a summary of the benefits the Scheme provides to consumers on the island of Ireland. Section 2.2 in particular describes these benefits with reference to security of supply, electricty market integration and facilitation of renewable energy. In addition, section 2.3 exclusively deals with the implication of the recent economic downturn on the need for the project. This section concludes that the key drivers for the project such as security of supply, electricty market integration and the longer term facilitation of renewable energy sources on the island are not signifiantly impacted by changes in short to medium term demand forecasts.

### 2. Alternatives (in particular Technical Alternatives)

Many of the submissions questioned the alternatives which have been considered for the project, in particular the technical options considered. The specific issues related to:

- Environmental and cost comparison of underground cables (UGC) versus overhead lines (OHL);
- Routing suggestions for UGC;
- Reference to international examples and advances in technology; and
- Other options to meet the needs of the project.

### Examples of issues raised are set out in Appendix C (Section 2.2).

**Response:** Technology options are addressed in Chapter 3 of the *Final Re-evaluation Report*. The chapter reviews latest studies on technology options available to the project and includes a comprehensive review of the findings of the International Expert Commission (IEC). Section 3.3 in particular provides a comparative assessment of the use of High Voltage Direct Current (HVDC) technology as an alternative to High Voltage Alternating Current (HVAC) technology and includes consideration of the findings of the IEC report. The results of this comparative assessment are

summarised in section 3.3.1 and highlight that the HVAC option is the preferred solution based on a range of criteria including cost, transmission network expansion and international best practice. In relation to the cost difference between HVDC and HVAC technology options in particular, the *Final Re-evaluation Report* noted that the IEC had confirmed that a HVDC UGC option would cost at least €333 million more than a comparable HVAC OHL option.

Since the publication of the *Final Re-evaluation Report*, EirGrid has also recently published a new study into the cost of undergrounding the proposed North-South 400 kV Interconnection Development. The study<sup>4</sup> by consultants Parsons Brinckerhoff follows from their recent study for the UK Government on *Electricity Transmission Costing*<sup>5</sup> and provides the most up-to-date information on the cost of a HVDC UGC solution for the project. In summary, the report further confirms that the cost of a HVDC UGC option would be significantly higher than that of a HVAC OHL solution and indicates that the range of cost difference for the Scheme (excluding the intermediate substation near Kingscourt) would be in the region of €670 million euro.

### 3. Study Area, Corridor Identification and Corridor Evaluation

Many of the submissions made observations and comments on the project study area and the corridor identification and evaluation processes. Examples of issues raised are set out in **Appendix C** (Section 2.3).

**Response:** The re-evaluation of the proposed study area is addressed in Chapter 4 of the *Final Re-Evaluation Report.* As noted under section 4.3 of this report, the re-evaluation included consideration of previously published material on the study area including an assessment of using the eastern coast as a boundary for the study area<sup>6</sup>. The chapter concludes in section 4.5 by stating that no new constraints information has arisen which would require the introduction of additional study area within which to route the proposed North-South 400 kV Interconnection Development. Section 4.4 of the *Final Re-evaluation Report* also outlines the rationale for the use of two study areas for the project and Appendix B of this report includes a specific response to a submission on this matter. In this regard, submission FS-2 contended that the two study areas "*should have been unified into one study area from Woodland to the border*"<sup>7</sup>. EirGrid's response to this contention clarifies that the continued division of the study area into two sections is provided primarily to "*facilitate review by the public and other parties of that portion of the scheme which is of most importance to them...*".

The re-evaluation of route corridor identification and comparative assessment is adressed in Chapter 6 and Chapter 7 of the *Final Re-evaluation Report* respectively. The aim of the corridor

<sup>&</sup>lt;sup>4</sup> Cavan-Tyrone & Meath-Cavan 400 kV Transmission Circuits – Technology and Costs Update, available at http://www.eirgridprojects.com

<sup>&</sup>lt;sup>5</sup> Available at http://www.theiet.org/factfiles/transmission.cfm

<sup>&</sup>lt;sup>6</sup> Available at http://www.eirgridprojects.com

<sup>&</sup>lt;sup>7</sup> Refer to Final Re-Evaluation Report – Appendix B, page B18, available at http://www.eirgridprojects.com

identification process is to identify feasible route corridors within the study area. This re-evaluation takes into consideration updates to the detailed constraints assessments previously undertaken and Chapter 6 concludes that no new significant information has arisen which would give rise to alternative route corridors being identified. The comparative corridor evaluation outlined in Chapter 7 then identifies the least constrained corridor option across both study areas between Woodland and Turleenan. This preferred route corridor is described in Chapter 7 as route corridor option A (CMSA) and route corridor option 3B (MSA). As described under section 4.2, the general location of the proposed intermediate substation is determined by the point of intersection of this least constrained route and the existing Flagford-Louth 220 kV OHL. This intersection guides the future siting of a substation in the vicinity of Kingscourt when the need arises.

In conclusion, in response to feedback received, the aim of the above summary is to provide further clarity on relevant conclusions reached within the *Final Re-evaluation Report*. Although a number of issues were raised in relation to the report itself and the conclusions reached, no new issues were identified during public and stakeholder engagement on the *Final Re-evaluation Report* which would alter, or cause reason to review, the conclusions of EirGrid and its consultants in respect of the technical nature of the proposed North-South 400 kV Interconnection Development location of the preferred line route.

It should be noted however, that as part of the Environmental Imapct Assessment (EIA) process, a number of key items adressed in the re-evaluation process such as technology alternatives and project need will be further addressed in documents to be submitted with the application for planning approval, including the EIS.

### 2.2.6 Submissions Relevant to the Preferred Project Solution Report

A number of submissions raised specific concerns or enquiries in respect of the alignment of the planned circuit, including potential localised modifications to, or siting of, the alignment as well as access during the construction phase. The issues raised are summarised below and set out in **Appendix C (Section 3)** of this report under the following headings:

### 1. Modifications

A number of submissions received from stakeholders related to the modifications made to the indicative line route since the last phase of landowner engagement in July 2011 and suggestions for further modifications to be made to the line route. General concerns in relation to the rationale for the modifications made, and how the modifications would impact specific landholdings or dwellings and farming activities, were raised by a number of stakeholders. Other concerns were more site specific. Examples of specific requests and issues raised in relation to the modifications are set out in **Appendix C (Section 3.1.1)** of this report.

**Response:** The line design process and the consequent modifications made to the indicative line route are addressed in detail in **Chapter 3** of this report. The line design process involves consideration of a

range of environmental and technical matters relevant to OHL design generally and others more specific to the particular project (including landowner feedback), in order to determine what constitutes the most suitable line design. Specific requests for modifications are currently being considered as per the process set out in **Section 2.4** and include the following:

- Some stakeholders felt that the modifications in the vicinity of Doohamlet as set out in **Table 3.2**, has resulted in a greater impact on their landholding or dwelling house and requested additional options are considered to make the required diversion;
- Some landowners advised of locations within their land that would either be unsuitable for locating structures or would significantly impact upon their farming practices or woodlands and requests for minor adjustments to the proposed alignment through their lands; and
- Request that partial undergrounding be considered from the intersection with the existing Oldstreet-Moneypoint line into Woodland substation.

In addition, this currently preferred alignment will be the subject of further landowner engagement, other public and stakeholder consultation and input, as well as on-going technical and environmental assessment and analysis. The final line design for the North–South 400 kV Interconnection Development to be submitted to ABP will be assessed and included in the EIS which will accompany the planning application for approval.

### 2. Information on the Line Route and Design and Location of Towers

Many submissions raised concerns regarding the proposed line route and the design and location of the tower structures. Queries included the location and footprint of towers, the distance between towers and the required clearance from the ground. Other specific requests and issues raised are set out in **Appendix C (Section 3.1.2)**.

**Response:** The line design process including the approach to siting towers and tower design is described in detail in **Chapter 3** of this report. It is intended to carry out further technical, environmental and other surveys and studies to confirm the specific siting of structures and inform the preparation of the EIS. Landowners, will therefore, have a further opportunity to influence the fixing of those tower structure positions which may directly affect them. The final line design for the North–South 400 kV Interconnection Development to be submitted to ABP for approval will identify fixed tower structure positions. EirGrid will not be seeking permission in its application to move tower positions post-planning (previously referred to as "micro-siting").

#### 3. Proximity to Dwellings and Other Receptors

Many submissions expressed concerns relating to the proximity of the line route to dwelling houses or other receptors, such as community facilities and schools. A large number of the attendees at the project information days also requested measurement of the exact distance of the indicative line route from their dwelling house or other receptors. The concerns were generally on the grounds of visual impact or health concerns. Specific requests and issues raised in relation to the proximity of the line route to dwelling houses or other receptors are set out in **Appendix C (Section 3.1.3)**.

**Response:** EirGrid acknowledges landowner and householder concerns in respect of the project's potential impact on specific landholdings and dwellings. EirGrid endeavours to provide stakeholders with appropriate and relevant information in respect of the project. The potential impact of the project on individual dwellings, landholdings and other receptors, such as community facilities and schools will be assessed and included in the EIS which will accompany the planning application for approval.

#### 4. Construction, Access to Lands

Construction methodology and land access were raised in a number of submissions. During the project information days a number of stakeholders also requested additional information on these topics. Queries included what steps EirGrid can take in the event of consent for access not being given by landowners. Some stakeholders also enquired whether EirGrid's rights extend to stringing towers over land without landowner consent and asked what rights the landowner maintained. Specific issues raised in relation to the construction process, land access and operational phase of the development, are set out in **Appendix C (Section 3.2)**.

**Response:** Observations received in respect of the proposed construction process, including access to land (during construction and operation), have been considered in the preparation of **Chapter 5** of this report. In addition, EirGrid confirms that an agricultural advisor will be made available to all landowners should they wish to discuss the project and jointly explore ways of minimising the impact of the project on their farming practices. Landowners who wish to avail of this can find the relevant details in their landowner packs. The potential impact of the construction and operational phases of the North–South 400 kV Interconnection Development on landholdings will also be assessed and included in the land-use/agronomy section of the EIS.

### 2.2.7 Responses Relevant to the Environmental Impact Assessment Process

As part of this stage of public engagement, issues of relevance for the EIA were raised. Details of specific observations, constraints and considerations raised by stakeholders and of potential relevance for the EIA stage are set out in **Appendix C (Section 4)**.

### 1. Agronomy

A number of landowners raised concerns about potential farming restrictions that will apply to their land following the construction of the project. These stakeholders were concerned that the project would result in the sterilisation of farmland beneath and adjacent to the tower structures and the OHL circuit. Other concerns included the potential impact on animal health and the proximity of the indicative line route to farm buildings. Specific concerns raised by stakeholders in relation to these issues are outlined in **Appendix C (Section 4.1)**.

#### 2. Community and Socio Economic Impact

A number of submissions raised concerns that the project will give rise to unrest within their communities with some advising that any landowner who allows a tower will be in opposition to their community and that the project will result in divisions amongst neighbours. A number of stakeholders felt that the receiving community would not benefit from the project. In addition they raised concerns that the project would negatively impact businesses in the vicinity of the line route and in particular those that depend on tourists. Specific concerns raised by stakeholders in relation to community and socio-economic impacts are outlined in **Appendix C (Section 4.2)**.

### 3. Cumulative Impact

A number of submissions raised concerns regarding the cumulative impact of future development in the vicinity of the project. In particular, the substation in Moyhill, the future development of lines in the area and the development and extension of wind farms in proximity to the line route. Specific concerns raised by stakeholders in relation to cumulative impact are outlined in **Appendix C (Section 4.3)**.

### 4. Cultural Heritage & Archaeology

Concerns were raised regarding the project's potential impact on cultural heritage and archaeological sites in proximity to the line route. Specific sites identified by stakeholders for consideration by the project team during the EIA process are listed in **Appendix C (Section 4.4)**. Other stakeholders queried the diversion around the site of the Battle of Clontibret, advising that as this does not attract tourists they felt that this diversion resulted in a greater environmental impact.

### 5. Ecology

Submissions outlined general concerns regarding wildlife in proximity to the line, in particular birds, bats and fisheries. Specific ecological sites and features identified by stakeholders for consideration by the project team during the EIA process are listed in **Appendix C (Section 4.5)**. Other concerns included noise impact on bats, the impact on a locally important brown trout fishery and spawning beds of Lough Mourne.

#### 6. Health

A number of submissions outlined general concerns about perceived health impacts due to the presence of overhead powerlines, specifically in relation to Electric and Magnetic Fields (EMF) including cancer, childhood leukaemia, and the impact on mental health including stress and depression, and human fertility. These concerns were typically raised in the context of the proximity of the proposed line route to the stakeholder's dwelling house or other receptors such as community facilities and schools. Specific queries and concerns raised about the potential health impacts associated with the project are outlined in **Appendix C (Section 4.6)**.

#### 7. Landscape & Visual Impact

General concerns regarding visual impact and how the project could impact upon the visual amenity of the landscape in proximity to the line were expressed by a number of stakeholders. Stakeholders feel the line and associated structures would be unsightly and impact on scenic views of the countryside. Specific concerns relating to landscape and visual impact are outlined in **Appendix C (Section 4.7)** of this report.

#### 8. Noise

Some stakeholders expressed concerns regarding the potential noise impact of the interconnection development particularly in relation to areas in close proximity to the line route and associated structures. Specific concerns raised in relation to potential noise impact associated with the North–South 400 kV Interconnection Development are outlined in **Appendix C (section 4.8)**.

**Response:** These topics have been considered in the preparation of **Chapter 6** of this *Preferred Project Solution Report* and will be further considered by the relevant specialists in preparing the EIS to accompany the planning application to ABP for approval of the North–South 400 kV Interconnection Development.

As detailed in **Section 2.2.1.2** of this report, EirGrid had a range of technical experts including an EMF specialist available at the project information days to provide all interested parties with information and to answer any queries. As part of the consultation on this report, EirGrid will hold a further series of open days where various technical experts will again be available to meet with stakeholders and answer their queries.

In addition to this, stakeholders with specific enquiries can also contact the project information service to request information or set up an appointment to meet with relevant members of the project team.

Furthermore, with the identification of the preferred line design, the North-South 400 kV Project has now been developed to a level of detail considered sufficient to allow EirGrid and its consultants to consider where significant impacts are likely to arise and the issues which need to be addressed in the Environmental Impact Statement (EIS). Therefore, in **Chapter 6** of this report, EirGrid has identified, in general terms, the range of issues which are likely to be considered in the EIS, the nature of the assessment of impacts in respect of that particular issue and the potential associated environmental effects.

### 2.2.8 Feedback on Other Issues

As part of this stage of public engagement, a number of submissions raised general issues relating to the project. These are detailed in **Appendix C** and are grouped under the following headings:

- Public Engagement;
- Planning;
- Compensation; and
- Property.

### 2.2.8.1 Response

EirGrid endeavours to provide stakeholders with appropriate and relevant information in respect of the project. Specific maps detailing the requested information were provided in response to requests from stakeholders. EirGrid is also committed to ensuring that all stakeholders are aware of the opportunities to participate. The feedback received in relation to the promotion of this round of engagement has been considered and, where appropriate, incorporated into future project activities.

The potential impact of the project development on property will be addressed within the EIS which will be prepared for the application in accordance with existing guidelines. It is proposed that consideration of this issue will be included within the EIS chapter on Material Assets. **Section 6.2.4.8** of this report provides a summary outline of the proposed scope of this chapter for consultation. EirGrid also endorses the approach to loss of development rights set out in the ESB/IFA Code of Practice.

In the event that the proposed development receives planning approval and proceeds to construction, landowners of holdings which are directly affected by the routing of the alignment, either by way of having structures located on, or wayleaves across their lands, are entitled to statutory compensation. While agreement regarding compensation is always sought by EirGrid with landowners, there is also a process of independent arbitration, in the event agreement cannot be reached. The statutory entitlement to compensation is considered to offer an appropriate mitigation to landowners in respect of the impact, if any, upon property directly arising from the development of strategic transmission infrastructure on their lands.

### 2.2.9 Feedback on Community Gain

A number of stakeholders provided feedback relating to community gain, this is detailed in **Appendix C**. All feedback relating to community gain, has been collated and will be issued to the relevant parties (e.g., Department of Environment, Community and Local Government (DOECLG) and Department of Communications Energy and Natural Resources (DCENR)) for consideration as part of the decision making process for determining a suitable community gain model in respect of transmission projects. In this latter regard, it should be noted that any future policy in respect of Community Gain is likely to be in respect of major transmission projects in general, rather than specifically for the North-South 400 kV Interconnection Development Project.

# 2.3 PREVIOUS SUBMISSIONS RELEVANT TO THIS STAGE OF PROJECT DEVELOPMENT

Due to the unique context of the North-South 400 kV Interconnection Development (in terms of the previous application for planning approval and feedback arising from the Preliminary and Final Re-evaluation Reports) there is a considerable volume of written and oral submissions by prescribed bodies, other stakeholders, landowners and the general public. These submissions contain information which was useful to EirGrid in undertaking its review of the nature and location of the new development as part of the re-evaluation process and, ultimately, in the identification of the preferred project solution. These submissions also included specific issues relating to line route, including potential localised modifications to the alignment or siting of structures. These were acknowledged in the *Final Re-evaluation Report* as matters more appropriately associated with, and thereby addressed by, the process of route confirmation and preparation of the EIS.

As part of the line design process, each issue was subject to detailed review and assessment in line with the approach outlined in **Section 2.4**. Where the recommendation or request to modify the line design was determined to be environmentally and technically feasible, modifications to the line design have resulted. A summary of the issues and specific modification requests is set out in **Table 3.1**, **Table 3.2** and **Table 3.3** of **Chapter 3**. In this regard, the report acknowledges issues and requests for modification of the line design by statutory bodies and other organisations that made submissions. However, in the context of EirGrid's legal obligations in respect of data protection, this report does not detail any requests which might reveal the identity of, or discussions or requests to modify the line route from, private individuals/landowners.

### 2.4 HOW SUBMISSIONS MAY INFORM THE LINE DESIGN PROCESS

It is EirGrid's experience of developing electricity transmission infrastructure, that individuals who live in close proximity to the line route, including landowners, will often make a request to maximise the distance from the proposed line to their dwelling. In addition, landowners will often express a preference as to where the line might cross their land; or request a change as to how or where a line is proposed to cross their land; and, in particular, where any structures might be located on their land (e.g. on field boundaries or in

hedgerows). In addition, other bodies and organisations (including prescribed bodies) often raise issues or concerns in respect of particular aspects of the proposed development, including tower positions.

Modification requests have and will continue to be dealt with as follows:

- From a technical perspective, the proposed tower position modification will be assessed using a Digital Terrain Model (DTM), Power Line Systems Computer Aided Design and Drafting (PLS CADD), aerial photography, aerial LiDAR<sup>8</sup> and Ordnance Survey mapping to determine its feasibility. Implications for tower spans, tower heights, conductor clearance levels, separation distances to dwellings, etc. will also be assessed; and
- From an environmental perspective, the proposed modification is assessed by the relevant specialists

   including ecologists, archaeologists, hydrologists, geologists, landscape architects, planners, agronomists and wayleave agents. Initially, a desk based assessment is undertaken which includes a review of environmental constraints using aerial photography, LiDAR and other environmental datasets. Field, vantage point and other site specific surveys are also carried out where applicable and, if possible, surveys are carried out on the lands with the consent of the landowner;

The guidelines for dealing with modification requests are set out below:

- All reasonable design change requests will be technically and environmentally assessed in accordance with the approach outlined above.
- In order to be acceptable, suggested design changes:
  - must meet general line design requirements<sup>9</sup> (this includes the environmental and technical considerations identified in Section 3.3.2);
  - must not result in an undue greater impact for nearby or adjoining dwellings/sensitive receptors;
  - o should minimise the number of macro<sup>10</sup> changes to the overall line design; and
  - proposed modifications should be confined, where possible, to the landowner's property, unless otherwise agreed with adjoining landowners.
- A balanced judgement will be made based on technical, environmental and other considerations.

<sup>&</sup>lt;sup>8</sup> LiDAR is a remote sensing technology that uses laser scanning to collect height and elevation data

<sup>&</sup>lt;sup>9</sup> Priority is given to modifications to ensure compliance with relevant legislation (Codified Environmental Impact Assessment (EIA) Directive 2011/92/EU) and Habitats Directive ((92/43/EEC)).

<sup>&</sup>lt;sup>10</sup> Representing a significant change over several hundred metres which has generally resulted in additional angle masts

The next phase of landowner engagement will provide a further opportunity for landowners to provide feedback on the proposed structure locations on their land. During this engagement, individual landowners may express a preference as to where structures might be relocated on their land. All reasonable design change requests will be technically and environmentally assessed (as detailed above). The appropriateness of further potential modifications to the line design will ultimately be confirmed in the application for approval in respect of the North-South 400 kV Interconnection Development. Where these can be accommodated, without creating additional impact, they will be further considered in dialogue with the landowner concerned, and may ultimately comprise part of the finalised proposal. Where it is assessed that they would create additional avoidable significant impact, it is likely that it will not be possible to include them as part of the final application for planning approval.

## **APPENDIX F**

Appendix C of the Preferred Project Solution Report

The Final Re-evaluation Public Engagement Report



North-South 400kV Interconnection Development

# Preferred Project Solution Report APPENDIX C

The Final Re-evaluation Public Engagement Report



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### 1. SUBMISSIONS RECEIVED

EirGrid is grateful to stakeholders who took the time to provide their feedback during the structured engagement period on the *Final Re-evaluation Report*.

This appendix sets out a summary of the views, opinions and issues raised by stakeholders. The opinions and views set out in the following sections are those expressed by stakeholders who provided feedback and do not necessarily reflect the opinions or views of EirGrid.

All submissions made by stakeholders either in writing, on-line, at the information centres, open days or over the phone have as far as possible been captured, logged and reviewed by the project team and are summarised in the following sections. Members of the project team, including technical, environmental and EMF experts were available at each open day to engage with members of the public and answer any queries or questions that arose. As far as possible the project team endeavoured to respond to and capture the views and feedback provided by stakeholders during these events. This report, together with the complete submissions, has been reviewed by the project team in the preparation of the *Preferred Project Solution Report*.

In the context of legal obligations in respect of data protection, the personal details of consultees and the submissions they have made to EirGrid have not been published.

The issues raised by stakeholders have been grouped having regard to the Terms of Reference for this engagement period, and as listed below:

- Submissions relevant to the Final Re-evaluation Report,
- Submissions relevant to the *Preferred Project Solution Report*;
- Submissions Relevant to the Environment Impact Statement (EIS);
- Submissions on Community Gain; and
- Feedback on Other Issues.

Where issues raised are relevant to the current stage of the project it is responded to in **Chapter 2** of the main report. Where feedback received is relevant to subsequent stages, for example during the Environmental Impact Assessment (EIA) stage, it will be considered and responded to at such future stage, as appropriate.

### 2. SUBMISSIONS RELEVANT TO THE FINAL RE-EVALUATION REPORT

A large proportion of submissions raised issues that were of relevance to, or in response to, the *Final Re-evaluation Report.* The issues are grouped under three main headings as follows:

- Project need/scope;
- Alternatives; and
- Study area, corridor identification and corridor evaluation.

### 2.1. PROJECT NEED/SCOPE

During this engagement period many stakeholders made observations and provided feedback in respect of the need for the project. Specific issues included:

- Some stakeholders welcomed the project, acknowledged the need and requested information on potential employment opportunities and socio-economic benefits arising for the area. Other stakeholders advised that while they appreciated the need for the project, they were objecting to the technology proposed for this project.
- Other stakeholders did not accept the principle of the project. They advised that they did not believe that demand existed in Ireland for this project given the economic downturn and high levels of unemployment.
- A number of stakeholders raised concerns that the need for this project was driven to benefit and meet demand in the United Kingdom (UK), with some stakeholders referencing the export of wind energy to the UK market.
- Other stakeholders felt that there was no requirement for power transfer to Northern Ireland and advised that in their view, the project was proposed to fulfil the needs of the Greater Dublin Area (GDA). Others however referenced the recent outages in Northern Ireland and enquired about security of supply issues in Northern Ireland.
- General enquires were received regarding the ability of the project to improve competition. Specific points included:
  - How the transfer of electricity between jurisdictions would improve competition given that EirGrid is the system operator in both jurisdictions.
  - The relationship of the project with electricity supply/generation, tariffs paid for electricity generation and the source of the power to be transmitted through the proposed interconnector.

- A number of stakeholders noted that they would like to see a reduction in electricity prices and enquired as to how these savings were calculated and would be passed on.
- Other stakeholders felt that the cost of undergrounding the line should be borne by all electricity consumers in Ireland.
- Expressions of support for renewable energy and the integration of renewable energy with the transmission network were received. Specifically support was shown for the generation of wind energy in Ireland. In addition, some stakeholders enquired as to how EirGrid plans to reduce its dependency on fossil fuels and how Ireland's plans to increase renewable energy are progressing.
- A number of stakeholders questioned why the substation at Kingscourt has been deferred and sought clarification of EirGrid's future plans in the area.
- Some stakeholders enquired what benefits the project would bring to their community and local businesses.

### 2.2. ALTERNATIVES

Many of the submissions received questioned the alternatives which have been considered for the project, in particular the technical options considered.

The specific issues related to:

- Environmental and cost comparison of underground cables (UGC) versus overhead lines (OHL);
- 2. Routing suggestions for UGC;
- 3. Reference to international examples and advance in technology; and
- 4. Other options to meet the need of the project.

### 2.2.1 ENVIRONMENTAL AND COST COMPARISON OF UGC VERSUS OHL

A number of stakeholders stated that it is their preference that the line be placed underground. In this regard, some stakeholders referenced the conclusion of the IEC review that undergrounding is technically feasible for the project. Some stakeholders questioned if EirGrid has not accepted the findings of this report and whether it has completely ruled out undergrounding, including the use of partial undergrounding, as an option for this project.

The benefits and disadvantages in respect of financial costs and environmental impacts for both UGC and OHL were raised by stakeholders. This included requests for further independent studies on the option of undergrounding.

### 1. Cost of Undergrounding

A number of stakeholders considered the key factor in deciding whether to propose OHL or UGC for this project is cost and suggested that the public would be willing to pay more for this project to be implemented using UGC. Some stakeholders advised that, as the project was funded by tax payer's money, they should have more input into the location and technology proposed for the project. Some stakeholders advised that, in their view, EirGrid would propose UGC if it was cheaper than OHL.

Other stakeholders referenced the different cost comparisons for OHL and UGC referred to by EirGrid since 2007 and suggested there was a lack of consistency. In doing so, stakeholders referenced continuing advances in technology and suggested that the cost differentials between the two technologies would likely decrease further in the future.

General enquires were received as to the basis of the cost comparison, including whether impacts on land value had been included in the comparison made, whether a detailed costing on UGC had been undertaken and how this compares with the projected cost savings to be achieved by the project.

Some stakeholders requested that the cost differential be provided in the context of an average projected increase on an electricity supply bill so they could establish the context.

### 2. Comparison of Environmental Impact

A number of stakeholders advised that they felt that placing the lines over ground would cost more in the long-term than undergrounding, due to its environmental impacts, community impact, health effects (particularly in respect of children) and/or property/land devaluation. Specific issues included:

- Stakeholders advised that unlike in the case of a road project, there is an alternative that they consider has a lower environmental impact, particularly in relation to visual impact and health.
- A number of landowners advised that they would have no concern with the construction of underground cabling through their land.
- Some stakeholders felt that the project was being progressed at the expense of their community, particularly in relation to health.
- Other stakeholders advised that, in their view, EirGrid has not adequately undertaken a comparative assessment of the impact of OHL versus UGC including the completion of an exhaustive study on the feasibility of an underground High Voltage Direct Current (HVDC) option.

### 2.2.2 UGC ROUTING SUGGESTIONS

A number of stakeholders suggested potential routing options for an UGC. The majority of these suggested co-location with existing infrastructure. Specific locations suggested include:

- Disused railway lines in Meath, Cavan and Monaghan.
- A 25m sterile corridor from Monaghan town to Aughnacloy along the N2. Stakeholders advised that landowners could provide additional land alongside the road.
- Investigation of an off-shore option or a route closer to the east coast.
- Existing linear corridors e.g. motorways or the route should have been combined with the recent gas pipeline project.

# 2.2.3 REFERENCE TO INTERNATIONAL EXAMPLES AND ADVANCES IN TECHNOLOGY

A number of stakeholders referenced international examples where UGC was used and referenced advances in UGC technology. Specific issues raised include:

- Some stakeholders made general enquiries regarding new electricity infrastructure in other countries and referenced recent projects in Spain, Denmark, Germany, the United Kingdom and Canada where UGC was selected as the technology of choice.
- Some stakeholders felt that EirGrid has and is continuing to ignore technological advances that would allow high capacity electrical infrastructure to be undergrounded with particular reference to VSC HVDC cable.
- General enquires were received as to why the United Kingdom can include longer sections of UGC than is feasible in Ireland and whether using lower voltage cables, e.g. 220 kV, rather than 400 kV would overcome any difficulties.

### 2.2.4 ALTERNATIVE OPTIONS TO MEET THE NEED OF THE PROJECT

A number of stakeholders questioned why other options such as the construction of new electricity generators between Dublin and Tyrone or additional wind farms along the west coast could not provide the same benefits of this project.

# 2.3. STUDY AREA, CORRIDOR IDENTIFICATION AND CORRIDOR EVALUATION

A number of submissions made observations and comments on the project study area and the corridor identification and evaluation processes.

With regard to the project study area, a number of stakeholders advised that in their view the reevaluation process should have looked at the broad area again. Others advised that the study area should have been extended to the east to include the option of co-location along the existing M1 corridor and the east coast.

A number of stakeholders made general enquiries regarding the removal of the proposed substation at Moyhill and how this affected the study area and resulting corridors.

A number of stakeholders had general enquires on the corridor identification and evaluation processes. This included suggestions for the co-location of the project along existing infrastructure corridors such as routing of the project along the N2. Other stakeholders advised how they considered there was a lack of transparency in route corridor and indicative line route selection and requested information on how constraints were evaluated including the determination of priority constraints during corridor evaluation.

Some stakeholders also felt that there was no significant difference between EirGrid's original findings as they relate to the CMSA and the findings detailed in the *Final Re-evaluation Report*.

# 3. SUBMISSIONS RELEVANT TO THE PREFERRED PROJECT SOLUTION REPORT

### 3.1. LINE DESIGN

A large number of submissions raised specific concerns or enquiries in respect of the alignment of the planned circuit, including potential localised modifications to, or siting of, the alignment as well as access during the construction phase.

The issues are grouped under the following headings:

- Modifications;
- Information on the structure design and locations;
- Proximity to dwellings and other receptors;
- Construction and access to lands; and
- Operation of the line.

### 3.1.1 MODIFICATIONS

A number of submissions received from stakeholders related to the modifications made to the indicative line route since the last phase of landowner engagement in July 2011 and proposed further modifications to the line route.

Specific requests and issues raised include:

- Information was requested on the modifications, including the rationale for modifications, made since the previous round of landowner engagement.
- Some stakeholders felt that these modifications had resulted in a greater impact on their landholding or dwelling house; others felt that their previous concerns had been taken into account; others raised concerns that the modifications meant that the line would no longer cross their land.
- In particular, some stakeholders felt that the modifications in the vicinity of Doohamlet as set out in **Table 3.2** of this report, has resulted in a greater impact on their landholding or dwelling house and requested additional options are considered to make the required diversion.
- Information was requested on whether any further details could be provided on the proposed location of towers at this stage and what future input stakeholders can have in the modification of tower locations.

- Concerns were raised about the potential impact on farming activities in particular where the line route traverses the centre of a field or a small field. Some landowners advised of locations within their land that would either be unsuitable for locating structures or would significantly impact upon their farming practices or woodlands.
- Requests for minor adjustments to the proposed alignment over specific landholdings.
- Request that partial undergrounding be considered from the intersection with the existing Oldstreet-Moneypoint line into Woodland substation.

# 3.1.2 INFORMATION ON THE LINE ROUTE AND LOCATION OF TOWER STRUCTURES

Many submissions raised concerns regarding the proposed line route and the location of the tower structures.

Queries from stakeholders in relation to line design included a number of site specific issues relating to the location and footprint of towers, the distance between towers, the required clearance from the ground and the route crossing agricultural landholdings.

A number of stakeholders had queries and concerns relating to the line route selection process. These included:

- Ecology and other environmental constraints have been prioritised over dwelling houses and impact on communities.
- EirGrid has kept the line away from houses and picked a route with the least number of houses so that there would be fewer objectors.
- Why the line route is not straighter and what is the rationale for changes in direction within the line.
- Whether the tower locations can be amended after planning is granted.

Stakeholders enquired as to how the proposed line design will compare with existing lines in the area citing the existing interconnector and the Flagford-Louth 220 kV line as examples.

Other stakeholders requested information on the proposed tower design and advised that monopole structures, wooden pole structures or twin pole structures would be preferable.

Queries regarding whether the proposed conductor would be insulated, the material it would be composed of and its proposed diameter.

A number of stakeholders questioned the rationale for the siting of angle structures away from field boundaries and requested information on how towers are located.

### 3.1.3 PROXIMITY TO DWELLINGS AND OTHER RECEPTORS

Many submissions expressed concerns relating to the proximity of the line route to dwelling houses or other receptors. A large number of the attendees at the project open days requested measurement of the exact distance from their dwelling house or other receptor to the indicative line route. A number of submissions received concerned the proximity of the line route to dwelling houses and other receptors, such as community facilities and schools. A number of stakeholders raised concerns regarding the proximity of these receptors to the line route on the basis of visual impact and stated their concern about health impacts.

Specific feedback included:

- The stakeholders most concerned about the proximity of their dwelling houses were typically within 500m of the indicative line route. These stakeholders stated that they were concerned about the visual impact of the project and raised concerns about the health impact on their communities, their families and their neighbours.
- Stakeholders referenced the distance from the line route advising that the 50m aspirational distance used by EirGrid was insufficient and referred to practices in other countries where greater distances were achieved citing examples in Scotland and Holland where they advised that a 100m separation distance is used.
- Some stakeholders expressed concern about the proximity of the line route to other receptors including:
  - Doohamlet National School concerns were raised that the school could see a reduction in numbers as a result of the proximity to the indicative line route;
  - Raferagh National School;
  - Annyalla National School;
  - Clontibret Goldmine;

- Clogher GAA pitch;
- Local alternative health clinic;
- Lough Egish Rod and Gun Club;
- Unmarked graveyard Corduff; and
- Flax mill in close proximity to the line route in Benagh.

### 3.2. CONSTRUCTION AND ACCESS TO LANDS

The construction process and land access were raised in a number of submissions and during the project information days a number of stakeholders requested additional information on these topics.

### 3.2.1 CONSTRUCTION ACCESS

A number of stakeholders made enquiries in respect of the legal rights of EirGrid to enter private lands. They queried what steps EirGrid can take in the event of consent for access not being granted by landowners. Some stakeholders enquired whether EirGrid's rights extend to stringing towers over land without landowner permission and asked what rights the landowner maintains.

A number of submissions by landowners advised that they did not want EirGrid to enter their land while others advised that they would only grant access if the project was undergrounded.

Specific queries and concerns raised include:

- Enquires regarding shared and private access tracks, how these will be utilised and how would owners be compensated;
- Concerns that the local roads were not suitable to support the construction traffic for this project;
- Enquires regarding the assessment of land damage during construction, how this would be undertaken and compensated;

- Concerns that a number of lanes and tracks in the vicinity of the line route currently experience difficulty with access for farm machinery and are not suitable for construction traffic;
- Enquiries relating to proposed traffic control measures to be implemented for the duration of the project and concerns about the impact of any additional traffic on local road users particularly cyclists and pedestrians; and
- Enquiries relating to the maintenance of the road network during the construction phase and reinstatement thereafter.

### 3.2.2 CONSTRUCTION PROCESS

A number of stakeholders requested information on the construction phase and provided feedback on this. Specific queries, feedback and requests for further information included:

- Requests for information on the cost of construction and how it would be funded;
- Requests for information on who is responsible for undertaking the construction, with some stakeholders advising of their negative experience with ESB during construction.
- Requests for information on the area required for construction (i.e., working area), and the approximate timeline for commencement and completion of the construction phase;
- The nature and extent of construction equipment and precautionary steps to avoid the spread of disease between farms;
- Concerns about damage to land during construction and requests for information regarding how tenants operating land will be compensated. Information was also requested on the timeline for land reinstatement following the construction phase;
- The storage of excavated soil and measures proposed to prevent contamination;
- The steps to be taken to prevent soil slippage;
- Details of the temporary construction site facilities that will be required and the number of construction workers on site at any one time; and
- The provision of security on site and details of insurance in the event an accident on site.

### 3.2.3 OPERATION

A number of submissions raised concerns about the operation and maintenance of the line following construction. Specific concerns included:

- Clearance from the ground:
  - A number of landowners raised concerns that the sag on the line would increase in wet weather and that this would lead to those working under the line being more susceptible to shocks; and
  - One stakeholder advised of being aware of persons receiving a "shock" from a disconnected electric fence and from a metal trailer which were close to an existing 400 kV overhead line. Also mentioned that it was possible to light a fluorescent tube by holding it up underneath a 400 kV line.
- The towers would attract lightning strikes;
- Safety concerns regarding the lines falling and in particular enquiries as to who is responsible if there is an accident due to a falling line;
- The health and safety of anglers using carbon fibre rods under the line;
- Whether there is heat generated from the line and how this would impact trees;
- Enquiry regarding the impact on radio frequency once the line is energised; and
- Enquiries as to how the pylons would be secured to prevent climbing on them.

### 4. SUBMISSIONS RELEVANT ENVIRONMENTAL IMPACT

Feedback of relevance to the Environmental Impact Assessment (EIA) stage in the project development process was received during this round of engagement. The majority of these relate to the potential impact of the proposed development on environmental concerns broadly covered by the following topics:-

- Agronomy;
- Community and Socio Economic Impact;
- Cumulative Impact;
- Cultural Heritage & Archaeology;
- Ecology;
- Health;
- Landscape & Visual Impact; and
- Noise;

### 4.1. AGRONOMY

A number of landowners raised concerns about potential farming restrictions that will apply to their land following the construction of the project. These stakeholders were concerned that the project would result in the sterilisation of farmland beneath and adjacent to the pylons and their lines.

Specific concerns included:

- Restrictions on slurry spreading under the line;
- Restrictions on the use of machinery in fields;
- Restrictions to growing crops and trees under the line and around the base of the structure, with one stakeholder referencing a study in England that found that an OHL influenced the quality of crops grown in proximity to them.
- Impact of the pylons and the line on grazing animals; and
- Restrictions on the construction of new farm buildings.

Other concerns included the potential impact on animal health. Specific concerns included:

- Impact on chicken houses a number of stakeholders advised they understood that chicken houses could not be built within a specified distance of a 400 kV line;
- Impact on cows from the noise of the line and EMF with some stakeholders expressing particular concerns that the line would impact the fertility of their dairy cattle;
- Impact on fertility of pedigree cattle using artificial insemination; and
- Impact on bloodstock arising from EMF and the noise from the line.

Other stakeholders raised concerns about the proximity of the line to farm buildings including hen houses, sheep houses and cattle sheds.

### 4.2. COMMUNITY AND SOCIO ECONOMIC IMPACT

A number of submissions raised concerns that the project will give rise to unrest within their communities with some advising that any landowner who allows a pylon will be in opposition to their community and that the project will result in divisions amongst neighbours.

Other stakeholders advised that the receiving community was not benefitting directly from the project. They raised specific concerns including the potential loss of students to schools in close proximity to the line and the impact on their communities during the construction phase, particularly referencing construction traffic.

A number of stakeholders expressed concerns that the project would negatively impact the businesses in the vicinity of the line route in particular those that depend on tourists. Furthermore, some stakeholders raised concerns about how the project could impact upon community and tourism amenities including fishing, clay shooting and camping.

Other stakeholders enquired how this project would benefit the local communities particularly during the construction phase and whether any employment arising from same would benefit their communities.

### 4.3. CUMULATIVE IMPACT

Stakeholders raised concerns regarding the substation in Moyhill and the future development of lines in the area.

Other stakeholders raised concerns regarding the development and extension of wind farms in proximity to the line route.

### 4.4. CULTURAL HERITAGE AND ARCHAEOLOGY

Concerns were raised regarding the project's potential impact on cultural heritage and archaeological sites in proximity to the line route. Specific sites that stakeholders felt should be considered by the project team included:

- 12<sup>th</sup> Century cemetery in Cruicetown;
- The Hill of Tara;
- Bective Abbey;
- Telltown;
- The Brittas Demesne;
- Archaeological sites in the vicinity of Muff;
- Local archaeological sites such as monuments and ringforts; and
- Sites of industrial heritage such as a flax mill.

Other stakeholders queried the diversion around the site of the Battle of Clontibret, advising that this does not attract tourists and that they felt that this diversion resulted in a greater environmental impact.

### 4.5. ECOLOGY

General concerns regarding wildlife in proximity to the line were expressed, in particular birds, bats and fisheries. Specific ecological sites and features that stakeholders felt should be considered by the project team included:

- The impact on hedgerows during the construction phase;
- The impact on birds, with stakeholders advising of their concerns for:
  - Whooper Swans and their flight patterns;
  - Impact on Curlew in the vicinity of the line;
  - Black Lake is a cormorant roosting site;
  - Swan flight paths from Borraghy to Lough Egish;
  - Lakelands including Lough Egish;
  - Claderagh Bog and associated Woodcock and its ability to attract birds given its high ecological value. The stakeholder advised that in their view this bog was of higher ecological value than the Cashel Bog, which the line route now avoids.
- Noise impacts on bats referencing the Nicholls and Racey (2007) paper on the impact of OHL on bats; and
- The impact on a locally important brown trout fishery and spawning beds of Lough Mourne.

### 4.6. HEALTH

General concerns about the health impacts due to the presence of overhead powerlines, specifically in relation to Electric and Magnetic Fields (EMF), cancer, childhood leukaemia, and the impact on mental health including stress and depression, and human fertility were expressed. These concerns were typically raised in the context of the proximity of the proposed line route to the stakeholder's dwelling house or other receptors such as community facilities and schools.

A number of stakeholders suggested that health impacts could be avoided by putting the project underground.

Specific queries and concerns raised include:

- Requests for information on the health impacts of the existing 400 kV with some stakeholders advising that they felt that EirGrid has not adequately assessed the health impact and that the receiving community has not been provided with any assurances as to the long term safety of living in proximity to a high voltage OHL.
- Concerns were raised by certain members of the public regarding studies which they understand to show an impact of power lines on the health of communities particularly in terms of cancer, dementia and the incidence of miscarriage.
- Advised that they understood that EirGrid staff and other workers in Ireland and the UK could only spend a limited amount of time working under a powerline for health and safety reasons.
- A number of stakeholders raised concerns about the impact of the project on children with autism, and suggested that the cumulative effects of EMF in areas should be taken into account.
- A number of stakeholders raised concerns about the impact of overhead powerlines on pacemakers and requested information on restrictions for individuals with pacemakers in place in the vicinity of the proposed project.
- Reference was made to a paper by Dr. Neil Cherry on the Impact of EMF on melatonin production in humans.
- Stakeholders living in the vicinity of the existing 400 kV line from Moneypoint to Woodland advised that they had observed an increased incidence of health issues, including miscarriages, increase in cancer, and mental health issues amongst their families and across the wider community.

### 4.7. LANDSCAPE & VISUAL IMPACT

General concerns regarding visual impact and how the project would impact upon visual receptors, views of the countyside and the landscape quality of areas in proximity to the line were expressed by a number of stakeholders.

Stakeholders felt the line and associated structures would be unsightly and spoil the scenic views of the countryside resulting in adverse impacts on their community.

Specific concerns relating to landscape and visual impact received included:

- Stakeholders advised how they believed opposition to the project was due to the visual intrusiveness of the lines;
- Enquiries regarding the height of the structures were made;
- Numerous stakeholders expressed their specific concern regarding the potential proximity of structures to their dwelling houses and some advised how the project will be visible to them from all viewpoints from their dwelling house and/or farm;
- Adverse impacts on stakeholders panoramic views of the countryside which they stated will be affected by the tower structures;
- Stakeholders felt that EirGrid should look at the viewpoints from their dwelling house and requested EirGrid to visit their property. Furthermore, some stakeholders requested that a photomontage be produced by EirGrid from their property;
- Visual impacts on properties in the area of Drumlane;
- Some stakeholders felt that Monaghan was not a suitable location for the project given its elevated position and presence of hilly areas;
- Concern was raised from some stakeholders that structures would be positioned on the highest viewpoints within their area, with the highest peak near Shanco provided as an example; and
- Stakeholders enquired why planning applications for dwelling houses within the area had to be well buried within the landscape yet the proposed structures would be situated on elevated areas.

### 4.8. NOISE

Stakeholders expressed concerns regarding to the potential noise they felt the project would introduce to the areas in proximity to the line and associated structures.

Specific feedback relating to the issue of noise included:

 Stakeholders advised that they currently experience adverse noise impacts from 110kV lines close to their dwelling house, in particular during periods of rainfall when buzzing sounds are audible from their dwelling house.

- A number of stakeholders raised concerns about the impact of the project on children with autism, advising that a number of autistic children live in close proximity to the line route. The key concern raised in relation to autism was the impact of noise with specific reference to the impact of existing powerlines in the area.
- Some stakeholders requested further information to be provided to them including:
  - The noise chapter of the EIS;
  - Details on the noise levels of the project;
  - Details of the corona affect with some stakeholders advising how they felt noise would be audible from distances as far away as over 1km from the line route; These stakeholders queried what distances the noise would potentially be audible from;
- A number of stakeholders expressed their concerns relating to potential adverse noise impacts on their family, particularly when combined with the noise they already experience from existing lines in proximity to their dwelling house. The impact on autistic children in this context was particularly raised as a concern.
- Some stakeholders were concerned about the potential noise impacts particularly during nighttime periods.
- One stakeholder who expressed concern regarding noise impacts also raised a concern relating to air quality issues.

### 5. SUBMISSIONS ON COMMUNITY GAIN

As set out in the *Final Re-evaluation Report*, EirGrid is actively considering how best to adopt community gain within transmission project development and the Grid25 programme in general. As part of this consideration, EirGrid is currently engaging with key stakeholders including the Department of Environment, Community and Local Government (DECLG), Department of Communications, Energy and Natural Resources (DCENR) and An Bord Pleanála (ABP).

A number of stakeholders provided feedback relating to community gain. In particular this feedback related to who should receive community gain and how it should be administered. Specific feedback received included:

- The community living in close proximity to the proposed line route should receive the community gain rather than large towns that are typically 10km away from the line route.
- The fund should not be managed by the local authorities; suggested alternative administrators of the fund included the Leader initiative, local community groups and the Heritage Council.
- The system of community gain in operation by another developer was suggested as a successful model for EirGrid to follow. Other community gain initiatives identified by stakeholders included restoration of monuments and funding of community publications.
- A community gain fund would not be required if the project was put underground
- It was suggested that all 110 kV lines should be undergrounded in compensation for this project

That community gain would lead to them accepting the project.

### 6. FEEDBACK ON OTHER ISSUES

### 6.1. PUBLIC ENGAGEMENT

A number of stakeholders requested additional information about the project and provided feedback on the participation process. The majority of project information requests related to mapping. In particular, a number of stakeholders requested specific maps detailing the indicative line and the distance from their dwelling house or other receptors.

A number of stakeholders also provided feedback relating to the public information events, the promotion of the engagement period, and the ability of stakeholders to influence the project development.

Specific points raised by stakeholders included:

- A request that EirGrid consider using text messages to provide updates on the project to stakeholders.
- A request that EirGrid hold additional events in local communities along the indicative line route. In addition Kingscourt, County Cavan was suggested as a more appropriate venue for future public information days in County Cavan.
- A number of stakeholders felt that EirGrid has already made its decisions, is undertaking a public relations exercise and is not interested in listening to the views of their community.
- A number of stakeholders advised that they were previously unaware of the project or had not been sent information on the project previously.
- Other stakeholders felt that the consultation undertaken to date was not valid as the indicative route is broadly similar to the previous application.
- Some stakeholders felt that communities affected by this project had not had the same opportunities to participate when compared with the other EirGrid projects (e.g., Grid Link and Grid West).

### 6.2. PLANNING

A number of stakeholders enquired as to the planning process and who would determine whether the application would be granted or refused. Feedback was also provided on the previous application. A number of stakeholders felt that if the community objects to the project, ABP should not grant planning permission. A number of stakeholders felt that it was unfair that they had paid the fee to make a submission to ABP and that this was not refunded by EirGrid following the withdrawal of that application. Enquiries were also made about the planning process in Northern Ireland with some stakeholders suggesting that this project should be put on hold until NIE secures planning for the northern section of the line.

### 6.3. COMPENSATION

A number of stakeholders enquired as to the amount of, and structure of, the compensation arrangements for this project. Some stakeholders considered that the current compensation arrangement - whereby only directly impacted landowners are compensated - was unfair and suggested that a compensation package should be available to residents in close proximity to the line. Other stakeholders suggested that an inconvenience payment be made to landowners to facilitate access to the lands. Enquiries were also made as to the compensation package on the Northern Ireland section of the line and it was also suggested that the compensation package for all landowners and residents on the entire project should be the same.

### 6.4. PROPERTY

Stakeholders expressed concerns regarding impact on property values, loss of development potential and future development restrictions which may arise as a result of the project. Specifically some stakeholders requested clarification as to whether the project would impact their ability (and that of their family members) to obtain planning permission in the future. A number of stakeholders advised that as they felt that their property would be devalued, EirGrid should provide compensation.

## **APPENDIX G**

Table 3.1, Table 3.2 and Table 3.3 of the *Preferred Project* Solution Report which show examples of how issues and modification requests related to potential modifications to the line route

#### Table 3.1 Issue/Suggested Modifications – Affecting the Overall Line Design

Issue/Suggested Locations for Modification		Submission Reference/Rationale for Modification	Summary Findings of Assessment
This affects the majority of towers	Article 10 considerations	Re-evaluation process (ecology); consultation with prescribed body (NPWS)	<ul> <li>The line design has been modified to minimise potential impact on sites of potential ecological importance (including hedgerows and wetlands). This has been achieved by siting towers away from sites of potential ecological importance (including hedgerows and wetlands) and into adjoining fields.</li> <li>The majority of the line design for the North-South 400 kV Interconnection Development occurs across fields, comprising improved/managed farmland – a modified habitat where the ecological sensitivity is low.</li> <li>Outcome: Modification incorporated as part of Preferred Project Solution.</li> </ul>
This affects several towers	Separation distances to dwellings	Re-evaluation process (amenity)	The line design has been modified in several locations to maximise the lateral clearance from the centre of the proposed line route to the nearest point of dwellings. Outcome: Modification incorporated as part of Preferred Project Solution.

Table 3.2	Issue/Suggested Modifications – A	Affecting the Line Design in the CMSA
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Issue / Suggested Locations for Modification		Submission Reference / Rationale for Modification	Summary Findings of Assessment
Note: tower numbers ha are indicated for clarity	ve been revised. Both		
This affects several towers and line straights at various locations.	Drumlin locations throughout County Monaghan	Monaghan County Council in a submission in relation to the 2009 application prepared a tower by tower assessment of the line from an environmental perspective. The general conclusion was that they were querying why towers were at specific locations, particularly where they crossed higher drumlins.	<ul> <li>The submission by Monaghan County Council has been reviewed in detail. In general, in siting towers within the landscape of County Monaghan, EirGrid has sought to (a) achieve a balance between technical and environmental constraints having particular regard to landscape issues and (b) minimise the number of structures.</li> <li>The CMSA is dominated by a drumlin landscape and any route corridor options and overhead line routes in this area will encounter this type of landscape. In the CMSA, towers are often placed on drumlins, more typically on the lower slopes, as a result of the routing conflicts that arise primarily as a result of seeking to maximise the distance from residential dwellings and occasionally to avoid small lakes.</li> <li>For example, this type of routing conflict occurs in the vicinity of Lough Egish between towers 157 and 166. More elevated drumlins occur in the townland of Brackly and Tullynahinnera with a contour height of approximately 225m. The line is routed on the lower slopes of drumlins in this area to avoid Lough Egish, the associated scenic route / viewpoint and Boraghy lake and the drumlin in the townland of Cooltrimegish which has a contour height of 205m.</li> <li>Whilst it would be possible to put towers on lower slopes, this would require a significant number of additional angle structures and increase the potential environmental impacts. Given the objective of minimising environmental impacts it is considered that the current design represents an appropriate balance between technical design and environmental issues.</li> <li>Further amendments would create additional environmental impacts and are not being proposed.</li> <li>Outcome: No modification incorporated as part of Preferred Project Solution.</li> </ul>

Issue / Suggeste Modification	d Locations for	Submission Reference / Rationale for Modification	Summary Findings of Assessment
Note: tower numbers ha are indicated for clarity	ve been revised. Both		
<b>2009</b> : 111-125 <b>2013</b> : 103-117	Lemgare and Tassan Areas	Monaghan County Council; Feedback from Preliminary Re-evaluation Report.	The main issue in these particular cases is why the indicative route does not proceed in a straight line to where it meets the proposed NIE line at Lemgare and as a result passes through the Tassan and Derryhallagh areas.
			The main routing constraints in this area relate to dispersed rural housing, the identified site associated with the Battle of Clontibret and the area of higher ground in the Crossmore area. Whilst the full extent of the area associated with the Battle of Clontibret is not defined or protected, there is an area identified west of Clontibret which has an information board and associated amenity area. Having regard to this, it is considered that this constitutes a focal point for the battle site as there are no
<b>2009</b> : 99-118 <b>2013:</b> 110-131	Derryhallagh to Lemgare	Feedback from Preliminary Re-evaluation Report	other identified sites. In this context it was considered that the line should avoid this area. Additionally, the area to the north around Crossmore has a marginally higher underlying elevation than the Tassan and Derryhallagh areas. Routing the line in these areas takes advantage of the slightly lower topography. As the line route in this area avoids potential impacts on a known cultural
			heritage/amenity area and minimises visual impacts in this area further amendments are not being proposed. <b>Outcome:</b> No modification incorporated as part of Preferred Project Solution.
<b>2009</b> : 107-110 <b>2013</b> : 119-123	Cashel Bog	Monaghan County Council. Feedback from 2009 application.	In County Monaghan, peatlands and fens were, in previous years, frequently found throughout the county. Over time these features became either worked out or drained resulting in their loss. As a result, there are a small number of remaining bogs and fens in the county. These are identified in the Monaghan Fen survey 2008.
			Whilst not formally designated for protection in a National context, Cashel Bog is identified as having the characteristics of a pNHA. It would be possible to span the most sensitive part of the bog area but to do so, it would be necessary to locate a tower within the less sensitive area of the bog. Based on its ecological characteristics, and also having regard to residential constraints, the line route in this area has been amended to locate the line outside the bog.
			<b>Outcome:</b> The line has been diverted around the bog area as part of Preferred Project Solution.

Issue / Suggested Locations for Modification		Submission Reference / Rationale for Modification	Summary Findings of Assessment
Note: tower numbers ha are indicated for clarity	ave been revised. Both		
<b>2009:</b> 15-18 <b>2013:</b> 216-219	Corlea Bog	Monaghan County Council. Feedback from 2009 application.	Corlea bog is a small remnant of bog which is traversed by the line, however no structures are proposed to be located within any area of the bog, therefore there are no potential impacts on the bog. Therefore no amendments are being proposed in this area. <b>Outcome:</b> No modification incorporated as part of the Preferred Project Solution.
<b>2009:</b> 80-90 <b>2013:</b> 140-150	Doohamlet	Feedback from Preliminary Re-evaluation Report (FS-16); re-evaluation process. Granting of planning permission in Nov 2011 for a dwelling in the townland of Terrygreeghan, which is in the general Doohamlet area.	<ul> <li>The main issue arising in this case is that the line route is more visible in this area as it crosses several drumlins. The considerations and conflicting constraints in routing the line through a drumlin landscape have been set out previously, such conflicts arise in routing the line in the Doohamlet area.</li> <li>Appendix B of the Final Re-evaluation Report outlines reasons why the indicative line route alignment in this area is considered to be most appropriate.</li> <li>As a result of balancing routing conflicts, it was considered that altering the route in this area would result in additional structures and increased visibility, therefore no significant line design modification is being proposed in this area.</li> <li>However, since the previous application in 2009, planning permission has been granted for a dwelling in the townland of Terrygreeghan which is in the general area around Doohamlet. In order to maximise the distance to this permitted dwelling it is proposed to amend the line to incorporate localised diversion.</li> <li>Outcome: A modification has been incorporated as part of the Preferred Project Solution</li> </ul>
<b>2009:</b> 69-74 <b>2013:</b> 156-161	Scenic Viewpoint at Lough Egish	Monaghan County Councillors. Feedback from a submission to the Oral Hearing 2010	The main issue arising in this case is that it was suggested that the proposed development would create visual impacts when seen from the scenic viewpoint at Lough Egish.
			The current line route does not interfere with views of Lough Egish from the designated scenic route which is named "Scenic Views of Lough Egish" as it is located at distance of over 0.5km from this route. Modifications are not therefore considered necessary in this area.
			Outcome: No modification incorporated as part of Preferred Project Solution.

Issue / Suggested Locations for Modification		Submission Reference / Rationale for Modification	Summary Findings of Assessment
Note: tower numbers ha are indicated for clarity	ve been revised. Both		
<b>2009</b> : 70-74 <b>2013</b> : 156-160	Townland of Brackley (by Cremorne) semi natural wetland complex (Tower 72)	Re-evaluation process (ecology)	As set out above in relation to Cashel Bog the semi-natural wetland is considered to be of ecological significance. Similarly, whilst it would be possible to span the most sensitive part of the wetland area it would be necessary to locate a tower within the less sensitive area. Based on its ecological characteristics the line route in this area has been amended to locate the line outside the wetland area. <b>Outcome:</b> A modification has been incorporated as part of the Preferred Project Solution
<b>2009</b> : 10-17 <b>2013</b> : 217-224	Lough an Leagh	Cavan County Council. Feedback from 2009 application.	The CCC submission requested that consideration be given to undergrounding in this area, having regard to the number of lines and the proposed substation.
			The scenic view point referred to in the submission, Lough an Leagh is approximately 2km west of the line route. It is an elevated area with extensive panoramic views. The visual assessment indicates that visibility of the line from this location would be confined long distance views of the upper portions of some towers, these would be difficult to discern against the background landscape. There is therefore no strong justification for undergrounding in the vicinity of Lough an Leagh.
<b>2009</b> : 15-22 <b>2013</b> : 212-219	Muff Cross Roads/Muff Fair	Cavan County Council; Dr Ciaran Parker. Feedback from 2009 application.	<b>Outcome:</b> No modification has been incorporated as part of Preferred Project Solution. A photomontage from this viewing point shall be included in the EIS. The location of Muff Fair, whilst of historical significance, is not designated for protection as there are no significant features of cultural heritage in this area. Notwithstanding this potential alternative options in this area were reviewed. Any alternative route would require additional structures. As dispersed residential dwellings are a significant constraint in this area, additional structures would make the line more visible in this area. Therefore no amendments are being proposed in this area.
			<b>Outcome:</b> No modification has been incorporated as part of Preferred Project Solution.

Issue / Suggested Locations for Modification		Submission Reference / Rationale for Modification	Review
Note: tower numbers h Both are indicated for			
<b>2009:</b> T.130 – 135 <b>2013:</b> T. 270 – 265	Brittas Estate	Meath County Council. Feedback from 2009 application.	<ul> <li>Realignment options have been investigated in proximity to Brittas Estate in order to reduce the impact on this demesne.</li> <li>On balance given the achievement of the slightly reduced impact on the setting of the designed landscape, parkland and setting of Brittas House and reduced potential ecological impacts, it is recommended that a modification is made to the line design and be incorporated in the Preferred Line Route.</li> <li>Outcome: Modification incorporated as part of Preferred Project Solution.</li> </ul>
<b>2009:</b> T. 135 – 144 <b>2013:</b> T. 265 – T. 256	Whitewood House	Meath County Council; Irish Georgian Society. Feedback from 2009 application.	<ul> <li>Potential alternative options in this area were reviewed. However, if the line route is moved further to the west, it will impact on the setting of Cruicetown National Monument and Cruicetown House and demesne landscape. Any move to the east would result in a major rerouting in order to avoid Whitewood Lough, demesne and Nobber town.</li> <li>Outcome: No modification incorporated as part of Preferred Project Solution.</li> </ul>
<b>2009:</b> T. 90 – 97 <b>2013:</b> T. 310 – 303	Teltown	Meath County Council. Feedback from 2009 application.	<ul> <li>The DAU stated that the archaeological landscape is not currently referred to or protected in Irish legislation and current National Monuments Legislation does not allow for the protection of landscapes. Therefore the Zone of Archaeological Amenity (ZAA) at Teltown has no legislative basis. Whilst the Teltown area was therefore not included in the RMP, individual sites within the area are however included.</li> <li>These individual sites have been considered in the preferred line design and will continue to be a consideration in the formulation of the EIS. There will also be ongoing consultation with the DAU on this matter in advance of finalising the EIS.</li> <li>Outcome: No modification incorporated as part of Preferred Project Solution.</li> </ul>

Table 3.3	Issue/Suggested Modifications -	- Affecting the Line Design in the MSA
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Issue / Suggested Locations for Modification		Submission Reference / Rationale for Modification	Review
Note: tower numbers I Both are indicated for			
2009: T. 88 2013: T. 312	Boyne Valley Drive	Failte Ireland. Feedback from 2009 application.	<ul> <li>Potential alternative options in this area were reviewed. However, there are other constraints in this area e.g., Trim Airfield and new planning applications for dwellings.</li> <li>Outcome: No modification incorporated as part of Preferred Project Solution.</li> </ul>
<b>2009:</b> T. 45A – 47 <b>2013:</b> T. 357 -354	River Blackwater Valley	Meath County Council. Feedback from 2009 application.	<ul> <li>The River Boyne and Blackwater are crossed at two locations by the preferred line route. Other possible route corridors (1 and 2) cross the River Boyne and Blackwater at three separate locations.</li> <li>A Screening for Appropriate Assessment Report was completed for the previous application. This Report confirmed that the proposed development would not adversely affect the integrity of the River Boyne &amp; Blackwater SAC.</li> <li>Outcome: No modification incorporated as part of Preferred Project Solution.</li> </ul>
2009: T. 58 & T. 59 2013: T. 343 -341	Dunderry	Feedback from 2009 application.	<ul> <li>This change was considered in light of the amenity value of the area and in particular that of the Shamanic Healing Centre. This change is technically possible and balances the impacts on the demesne landscape, the energy healing centre, the impacts on Dunderry Village, views from the public roads and the graveyard.</li> <li>Outcome: Modification incorporated as part of Preferred Project Solution.</li> </ul>
<b>2009:</b> T.45 – 51	Bective Abbey	Meath County Council and Failte Ireland. Feedback from 2009 application.	Potential alternative options in this area were reviewed. However, they are constrained as any movement to the east would impact the Draft Tara Skyrne LCA and any movement to the west is constrained by Trim Airfield.
<b>2013:</b> T. 358 – 350			In addition the River Boyne and River Blackwater cSAC also required consideration and towers have been located in this area to minimise the impact on the cSAC.
			Outcome: No modification incorporated as part of Preferred Project Solution.

## APPENDIX H

Community Update Brochure (July 2013)



## North-South 400kV Interconnection Development

## **Community Update**

July 2013



Part Funded by the EU-TEN-E Initiative



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EirGrid Publishes Preferred Project Solution Report for Stage 3 Consultation



## The Project

EirGrid and Northern Ireland Electricity (NIE) are jointly planning a major cross-border electricity transmission scheme.

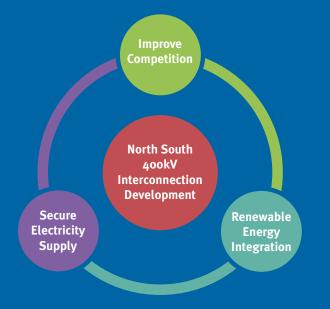
This scheme is a 400kV overhead line linking the existing 400kV substation in Woodland, County Meath with a planned substation in Turleenan, County Tyrone and will provide a second high capacity electricity transmission line between Ireland and Northern Ireland. EirGrid will in due course apply for planning approval for that part of the scheme located in Ireland called the North-South 400kV Interconnection Development.

## **Project Drivers**

The key drivers for this project are to:

- Improve competition This project will improve the efficiency of the all-island electricity market
- Ensure a secure supply of electricity This project will enhance the security of the electricity supply throughout the island of Ireland which is essential for economic growth, the creation of jobs and improving the standard of living and quality of life for all
- Help Ireland meet its 40% renewable electricity target

This project will allow more renewable energy to be connected to the network, reducing our production of greenhouse gases and our reliance on imported fossil fuels



NIE has already applied to the competent authority in Northern Ireland for approval for the part located in Northern Ireland.

## What has happened recently?

In April 2013, EirGrid published a Final Re-evaluation Report, which provided a comprehensive review of the project and was the subject of a six-week period of public engagement. Stakeholders, including members of the public and landowners, were invited to provide feedback on the content and findings of the report.

Stakeholders provided feedback on the Final Re-evaluation Report at nine open days in Meath, Cavan and Monaghan. Further feedback was received, through the project information service, which included telephone, email, post and face to face meetings with the project team during April and May 2013. This feedback has been considered and responded to by the project team and forms part of a new publication called the Preferred Project Solution Report.

## What is happening now?

The Preferred Project Solution Report for the North-South 400kV Interconnection Development documents the line design process and provides detailed information on the line route. An eight-week public consultation on the Report is underway from Tuesday 16th July to Monday 9th September 2013.

This is the final formal consultation period prior to the submission of an application for planning approval to An Bord Pleanála.

The preferred project solution is a 400kV overhead power line linking the existing 400kV substation in Woodland, County Meath with a planned substation in Turleenan, County Tyrone.

The Report provides detailed information on the line route, including

- Maps showing the preferred line route for the project and the proposed locations of the towers.
- Description of the methodologies for siting and constructing towers.
- An outline of the environmental issues to be addressed in the Environmental Impact Statement (EIS) which will accompany a future application for planning approval.

In developing the line design for this project, previously received landowner and stakeholder feedback has been considered.

EirGrid will not seek permission in its application to An Bord Pleanála to move tower positions post-planning. This was previously referred to as "micro-siting".



# EirGrid's Project Development & Consultation Roadmap

The North-South 400kV Interconnection Development has entered Stage Three: Confirm Design phase of the EirGrid Project Development & Consultation Roadmap.

The roadmap is a structured framework of project development that provides a clear and transparent process to all stakeholders.

During this phase feedback from stakeholders informs decisions made by EirGrid with regard to the specific nature, extent and location of the project.

EirGrid will seek to engage with landowners on the proposed route in order to ensure that any concerns

or matters regarding siting of the proposed towers are addressed.

Following the close of this 8-week consultation period, EirGrid will review and consider all stakeholder and landowner information received.

During this time, EirGrid will also undertake technical and environmental studies which will also inform the final project proposal.

EirGrid will then prepare a planning application, including EIS, for the proposed development, which will then be submitted to An Bord Pleanála for EIA and planning approval.



We are Here

#### **EIRGRID WELCOMES YOUR VIEWS**

EirGrid is seeking your views on the topics covered in the Preferred Project Solution Report, particularly on the following:

- Preferred line design.
- Construction methodology.
- Topics to be considered and/or addressed in the EIS.
- Any other feedback or comments on other issues relating to the project.

You can make a submission through the feedback form on the last page of this brochure, at the project open days or information centres, or through the project information service.

All feedback and submissions will be reviewed and considered by the project team and, where appropriate, will be incorporated into the proposed development which will be the subject of an application for planning approval to An Bord Pleanála. To facilitate this process all feedback should be received by 5pm on Monday 9th September 2013.

## Meet the Project Team

EirGrid extends an invitation to all interested members of the public and other stakeholders to attend information days on the project to meet the project team, learn more about the project and give feedback.

## **Information days**

Location	Date	Time
<b>Co Meath:</b> Education Centre Athlumney Navan	Tuesday 30th July 2013	1pm – 8pm
<b>Co. Monaghan:</b> The Workhouse Shercock Road Carrickmacross	Wednesday 31st July 2013	1pm – 8pm
<b>Co. Cavan:</b> Murtaghs Function Room, Main Street Kingscourt	Thursday 1st August 2013	1pm – 8pm

## The Environmental Impact Statement

## KEY ENVIRONMENTAL ISSUES THAT WILL BE CONSIDERED IN THE EIS

An Environmental Impact Assessment (EIA) will be conducted by An Bord Pleanála that will identify, describe and assess the direct and indirect effects of the proposed North-South 400kV Interconnection Development on the environment.

A key element of this EIA process will include the submission by EirGrid of an EIS with the application, for review by An Bord Pleanála.

Legislation and relevant guidelines require the potential impacts on the following environmental topics to be addressed in an EIS:

- Human Beings & Population.
- Flora & Fauna.
- Soil (Geology).
- Air.
- Water.
- Climatic factors.
- Landscape.
- Material Assets, including architectural, archaeological and cultural heritage.
- The inter-relationship between the above factors.

If you would like to identify issues and environmental topics that you feel should be addressed during this process, please participate in this consultation.

#### IN DETERMINING THE ISSUES TO BE ADDRESSED IN THE EIS, CONSIDERATION WILL BE GIVEN TO THE FOLLOWING:

- Legislative (EU and Irish) requirements and relevant guidelines.
- Issues of concern to the public and other stakeholders.
- Baseline studies and surveys.
- Alternatives considered.
- Likely significant impacts, e.g. visual impact of overhead power lines.

## **Feedback Form**



Return to:

Name	Return to:
	C/O EirGrid NS Project Manager,
Address	Block 2, Floor 2,
	West Pier Business Campus,
Telephone	Dún Laoghaire,
	Co. Dublin,
Email	Ireland.

## What are your views?



## **About EirGrid**

EirGrid, a state-owned company, is the national operator of the electricity transmission grid.

The national transmission grid is an interconnected network of high voltage power lines and cables, comparable to the motorways, dual carriageways and main roads of the national road network. It is operated at three voltage levels; 400kV, 220kV and 110kV and is approximately 6,400km in overall length within Ireland.

It is the backbone of Ireland's electricity system and is vital to ensuring that all industrial, commercial and residential customers from both rural and urban areas have a safe, secure, reliable, economic and efficient electricity supply.

### **Contact Details**

Write: C/O EirGrid NS Project Manager, Block 2, Floor 2, West Pier Business Campus, Dún Laoghaire, Co. Dublin, Ireland.

Phone: Lo-call 1890 25 26 90 (9am to 5pm Monday to Friday)

Email: northsouth@eirgrid.com

Website: http://www.eirgridprojects.com/projects/ northsouth400kvinterconnectiondevelopment

Visitor Information Centres open as follows until 5th September 2013 or by appointment:

#### Navan

Every Tuesday from 12 noon to 7pm 10a Kennedy House, Kennedy Road, Navan, Co. Meath.

#### Carrickmacross

Every Wednesday from 12 noon to 7pm Carrickmacross Workhouse, Shercock Road, Carrickmacross, Co. Monaghan.

#### Kingscourt

Every Thursday from 12 noon to 7pm Dun A Ri House Hotel, Station Road, Kingscourt, Co. Cavan.





www.eirgridprojects.com

Grid25 is EirGrid's ongoing development plan to deliver a sustainable, competitive and secure electricity supply to homes, business and industries. Grid25 will also help us meet our target of 40% of our energy supply coming from sustainable Irish sources.

## **APPENDIX I**

Samples of letters and related documents issued during landowner engagement

## **APPENDIX I**

## Samples of letters and related documents issued during landowner engagement

- I (i) Terms of Reference for Landowner Engagement
- I (ii) Phase 1 Landowner letter Landowner map Landowner Checklist
- I (iii) Phase 2 Landowner letter Landowner & Access maps Landowner Brochure Landowner Checklist
- I (iv) Phase 3 Landowner Modification Rejection Letter

## APPENDIX I(i)

Terms of Reference for Landowner Engagement



## Terms of Reference for Landowner Engagement

EirGrid is committed to providing an accessible, meaningful, and accountable consultation process.

With the publication of the Preliminary Re-Evaluation Report, EirGrid is now commencing public consultation, an important part of which is landowner consultation and engagement. This engagement will be carried out in accordance with EirGrid's Code of Practice in relation to Access to Land and/or Premises (see the accompanying letter from EirGrid).

EirGrid is seeking to engage with landowners with a view to ultimately identifying a final proposal that will be submitted to An Bord Pleanála for approval. Issues raised by landowners that relate to the project are important to EirGrid and will be documented and fed back to the project team for consideration.

This engagement process will have three phases:

#### **PHASE 1: INDICATIVE ROUTE**

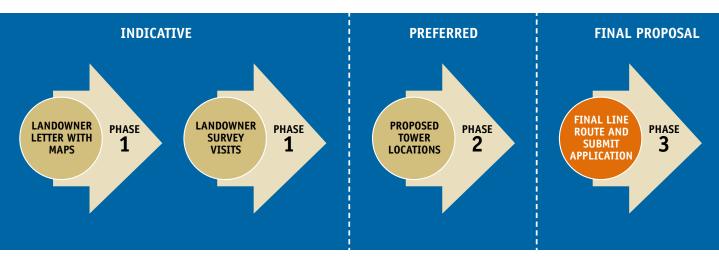
Phase 1 will be an opportunity to meet and discuss with landowners ownership of land, the line route and possible positioning of towers. It is also an opportunity to identify local constraints as well as any other issue the landowner may wish to raise, particularly those in relation to the Preliminary Reevaluation Report.

#### **PHASE 2: PREFERRED LINE ROUTE**

At the start of this phase landowners will receive updated maps of the preferred route and proposed tower locations. Landowners will then have an opportunity to comment on the tower locations and to participate further in the consultation process.

#### **PHASE 3: FINAL PROPOSAL**

In Phase 3 landowners will be informed of the final proposal that EirGrid is submitting to An Bord Pleanála for approval. Landowners will receive maps and information confirming the route and tower locations included in the application for approval as well as information on the statutory consultation phase.



## APPENDIX I (ii)

Phase 1 Landowner letter

Landowner map

Landowner checklist



Address 1 Address 2 Address 3 Address 4.

LMC/LCT

Date:

Dear M.....

#### **Re: North-South Interconnection Development**

You may be aware as a result of recent national and local consultations, that significant development of the national electricity transmission system is being proposed. This development is being carried out by EirGrid plc ("EirGrid").

It is part of EirGrid's role to plan the system, and in doing so, it has identified the need for a new North-South 400kV Electricity Interconnector. EirGrid has been in the process of carrying out research into the most appropriate route corridor for this project following on from which an indicative route has been identified that would, if adopted, affect lands which appear to be in your ownership.

The approximate position of the indicative route is shown in red on the attached map.

Since this process involves a visit to you and may involve a survey of your land, an information note setting out EirGrid's Policy Towards Landowners for Access and Survey of Land has been attached to this letter. The information note also contains a short statement setting out the legal basis on which EirGrid was established, its duties and functions, and its rights with respect to entry onto land to carry out surveys in support of its functions. Please be assured, consistent with EirGrid's attached policy every effort will be made to ensure that any survey that may be required is carried out with the minimum of inconvenience or disturbance to you or your property.

Yours sincerely,

[Company Secretary]

Carrickmacross Information Centre, Carrickmacross Workhouse, Shercock Road, Carrickmacross, Co. Monaghan. Tel: 1890 25 26 90 Email: cavantyroneinterconnector@eirgrid.com Web: www.eirgrid.com Directors

Bernie Gray CHAIRPERSON Dermot Byrne CHIEF EXECUTIVE Emer Daly William Egenton Cormac MacDonnchadha David Mackey Martina Moloney Dr Joan Smyth Richard Sterling Jane Williams

Registered Office The Oval 160 Shelbourne Road Ballsbridge Dublin 4 Ireland Registered in Ireland No. 338522 V.A.T. No. IE 6358522H Navan Information Centre, 10A Kennedy House, Kennedy Road, Navan, Co. Meath Tel: 1890 25 26 90 Email: meathcavanpower@eirgrid.com Web: www.eirgrid.com

#### Information regarding EirGrid's functions, powers and survey policy

#### Background to EirGrid plc

EirGrid plc (hereinafter referred to as 'EirGrid') of The Oval, 160 Shelbourne Road, Ballsbridge, Dublin 4 was established pursuant to Regulation 34 of the European Communities (Internal Market in Electricity) Regulations 2000 (S.I. No. 445/2000) and is the licensed Transmission System Operator for Ireland pursuant to Section 14 of the Electricity Regulation Act 1999. EirGrid is a state owned company.

EirGrid has the exclusive function to operate and ensure the maintenance of and, if necessary, develop a safe, secure, reliable, economical and efficient electricity transmission system with due regard for the environment. EirGrid is independent of the Electricity Supply Board.

The Electricity Supply Board (hereinafter referred to as the 'ESB') of 27 Lr Fitzwilliam St, Dublin 2, was constituted by the Electricity Supply Act, 1927. ESB is the licensed Transmission Asset Owner for Ireland pursuant to Section 14 of the Electricity Regulation Act 1999. In that role, ESB is responsible for building the transmission system. However, EirGrid will be responsible for making an application to An Bord Pleanála for planning approval.

#### Entering and Surveying Land

In accordance with established practice, EirGrid shall attempt to seek entry onto lands, for the purpose of surveying the route of an electric line across such lands, by agreement with the owners of those lands.

In the event that entry onto lands, for the purpose of surveying the route of an electric line across such lands, is not forthcoming on a voluntary basis, then EirGrid may require entry, pursuant to Section 20(4) of the Electricity (Supply) Act, 1927, as amended by Regulation 8 of S.I. 445/2000.

Whether entry onto lands, for the purpose of surveying the route of an electric line across such lands, is secured by way of agreement with the landowner or by exercising statutory powers, EirGrid shall ensure that "EirGrid Policy Towards Landowners for Access and Survey of Land" (Set out below) is adhered to.

#### EirGrid Policy Towards Landowners for Access and Survey of Land

- 1. EirGrid will ensure that staff and representatives acting for EirGrid will be suitably qualified and briefed on their responsibilities before entering private lands (or premises) or dealing with owners.
- 2. EirGrid will take reasonable steps to identify and contact the owner of the land (or premises) before entering private lands (or premises). The owners of land (or premises) will be dealt with honestly and fairly.
- 3. EirGrid will, where practicable, inform the landowner of what survey work is proposed and, as far as possible, a timetable for its completion.
- 4. Queries from the owner of the land will be dealt with promptly and courteously.
- 5. EirGrid staff and representatives will only enter lands or premises for legitimate purposes related to its activities and duties.
- 6. EirGrid staff and representatives will take reasonable steps to ensure that land (or premises) is left in as good a state as when EirGrid staff or representatives arrived.
- 7. EirGrid staff and representatives will endeavour to ensure that restrictions on the use of the land (or premises) during the survey stage are minimised.
- 8. EirGrid staff and representatives shall ensure due care and attention is taken to minimise the risk of spreading disease to or from farmland.
- 9. EirGrid staff and representatives shall take particular care to close all gates behind them and not to damage fences or hedges.
- 10. In the event of queries from the owner of the land (or premises) for further information, contact details for EirGrid will be advised to allow for such queries to be dealt with.



#### Consulting Engineers

Block 10-4. Blanchardstown Corporate Park. Dublin 15. Ireland. Tel: +353 (0)1 8030401 6 Fax: +353 (0)1 8030409 10

06/05/2011

### North-South 400 kV Interconnection Development

Dear

I am writing to you on behalf of EirGrid plc ("EirGrid"), the electricity Transmission System Operator.

As you may be aware, EirGrid has been engaged for some time in planning for the construction of a new North-South Electricity Interconnector. EirGrid submitted a planning application for a proposed 400kV overhead line Interconnector in December 2009. Unfortunately that application had subsequently to be withdrawn and EirGrid intends to submit a new application later this year.

EirGrid is currently in the process of carrying out a thorough re-evaluation of the overall project. The preliminary findings of the re-evaluation are that the new planning application should be based on a 400kV overhead line and that the route of the overhead line should follow substantially the same route as that of the previous application. The re-evaluation process will now enter a period of public consultation.

In the meantime EirGrid has instructed us to commence consultation with the landowners along the indicative line route that is emerging from the re-evaluation process. As I understand that you are one of these landowners, I enclose with this letter –

- a letter from EirGrid formally notifying you of the proposed development, which includes a map or map(s) showing the current indicative line route through your lands and
- a community update brochure for this project.

The map (or maps) show the indicative line route (in red) but do not indicate structure locations.

We have been appointed as a consultant to EirGrid on this nationally important electricity infrastructure project and over the coming weeks, representatives from our organisation will call to you. This is an important stage for all landowners; it will be an opportunity to confirm ownership; make comments and suggestions with respect to the project, the current indicative line route and to discuss your preference for the location of any structures on your land. You may for example have a preference for a structure to be placed in a particular field, or on a field boundary, and we would like to talk to you about this at the earliest opportunity as we may be able to advise EirGrid of ways to accommodate such requests subject to planning approval. The ability to do so will however be reduced over time as the application becomes more advanced. It may be necessary to arrange access to your lands for the purpose of surveying the area along the indicative route and this will also be discussed at the meeting.

I would encourage you to engage in the process at this early stage as it gives you the best opportunity to influence how the development will affect you, as a landowner, in the event that it does proceed to construction across your land. Please be assured that any discussions you have with us will not in anyway affect your right to participate in the planning process.

In the meantime should you have any queries please contact our information line on 1890.25.26.90 or visit one of the EirGrid Information Centres. The details of the opening hours and the location of the Information Centres can be found in the attached community update brochure.

Yours sincerely,

Mairead Hogan TOBIN Consulting Engineers





## North South 400kV Development CHECK LIST/RECORD FOR SURVEYOR'S PRELIMINARY VISIT

1) Line:	2) Landowner Ref
3) Name(s) of Occupier(s) or Owner(s)	
4) Telephone No.	Mobile No
5) Name(s) and relationship of person(s) interviewed	
6) Was Survey Letter dated and received?	Yes No
7) Was name and address correct on it?	Yes No
8) Is the named person owner 🗌 or occupier 🗌 ?	
9) Who else has any legal interest in the land as (joint) owner or	occupier, e.g. wife, partner, agent?
10) Is the extent of the holding (along the route) correct on map	Yes No
11) Is there bloodstock, bulls or need for special care, e.g. precau against the spread of Brucelloses and Bovine Tuberculosis?	cions Yes No 🗌
12) Is there restriction on access for survey:	Yes No 🗌
13) Is there restriction on the use of transport on lands during su	vey? Yes No
14) Are there any shelter belts, trees or shrubs of amenity value a	fected by the route? Yes No
If yes, give details	
15) Was any objection raised (a) to survey $\square$ (b) to route $\square$	
16) Was there mention of any particular spot(s) on the route when would be obstructive?	e a mast Yes No
17) Was there any query left without satisfactory answer?	Yes No
18) Is the landowner aware of the Code of Practice for Survey, Con and Maintenance of overhead lines in relation to the rights of as agreed between the ESB and the I.F.A.?	
Signed on Behalf of EirGrid:	Date
Signed on Behalf of Owner/Occupier:	Date
Notes:	
Block 10-4,	

## APPENDIX I (iii)

Phase 2 Landowner letter

Landowner and access maps

Landowner Information Brochure

Landowner checklist



Block 10-4, Blanchardstown Corporate Park, Dublin 15, Ireland Tel: + 353 (0)1 8030401/6 Fax: + 353 (0)1 8030409/10

Name Address Address Address Address

Landowner Ref:

15<sup>th</sup> July 2013

#### Re: North-South 400kV Interconnection Development

Dear

In April 2013, EirGrid wrote to you to invite you to participate in a public engagement programme in relation to its Final Re-evaluation Report for the North-South 400kV project. The period for public engagement on the Final Re-evaluation Report concluded on 27<sup>th</sup> May 2013. EirGrid has reviewed and considered the feedback received during that period and has now published its Preferred Project Solution Report. This new report identifies EirGrid's preferred route for the overhead line and the proposed locations for towers.

EirGrid now invites you to participate in a further period of public and landowner consultation associated with its Preferred Project Solution Report. During this stage you will have the opportunity to engage and influence how the development will affect you prior to EirGrid finalising the proposal and submitting it for planning approval. TOBIN have been appointed as a consultant to EirGrid on this important project and I would like to meet with you to discuss the proposal, and any modification requests or concerns that you may have. For your information, I enclose with this letter -

- an aerial map or map(s) showing the current preferred line route and any proposed tower locations on your lands;
- where applicable, an aerial map or map(s) detailing proposed indicative access routes for construction purposes;
- a community update brochure summarising the Preferred Project Solution Report, the project roadmap and details as to how you can participate in the public consultation process; and
- a landowner information brochure with additional information on construction methodologies and route selection.

Some farmers have expressed concern about the potential impact the project may have on their farming activities. If you have similar concerns, I can arrange for a professional agricultural adviser to meet with you to discuss the matter further and to jointly explore ways of minimising any impacts on your farm.

The preferred line design is in accordance with EirGrid guidelines for overhead line design and tower positioning, which takes into consideration farm and/or land management practices, technical and environmental constraints, some of which are outlined in the Landowner Brochure.

You may wish to express a preference as to where structures might be relocated on your land, and where reasonable, these design change requests will be technically and environmentally assessed. Where the change can be accommodated without creating additional impact, this will be further considered in dialogue with you. I would also ask that you would consider granting access for our specialists to survey the part of the route located on your lands.

Directors:	L.E. Waldron (Chairman) R.F. Tobin (Managing Director)	B.J. Downes	M.F. Garrick J.P. Kelly
	D. Grehan E. Connaughton (Company Secretary)		
	M. McDonnell C. McGovern B. Mulligan C. O'Keeffe		

Accordingly, please give me a call if you would like to propose a modification to one or more of the following:

- localised alignment of the route;
- location of any structure(s) on your land (such as repositioning onto a field boundary); and/or
- indicative access route(s) for construction traffic across your land;

Alternatively you can inform me of your proposed changes in writing by completing the change request form which can be found in the Landowner Brochure.

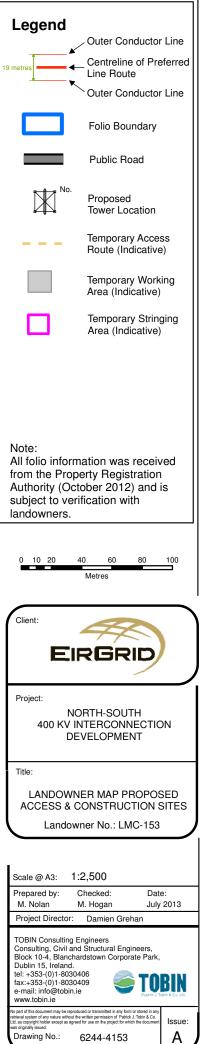
Please be assured that any discussions that you have with EirGrid or its agents during this or the previous consultation period will not in any way affect your right to participate in the planning process nor prejudice your right to make submissions or observations of whatever nature in relation to the overall project.

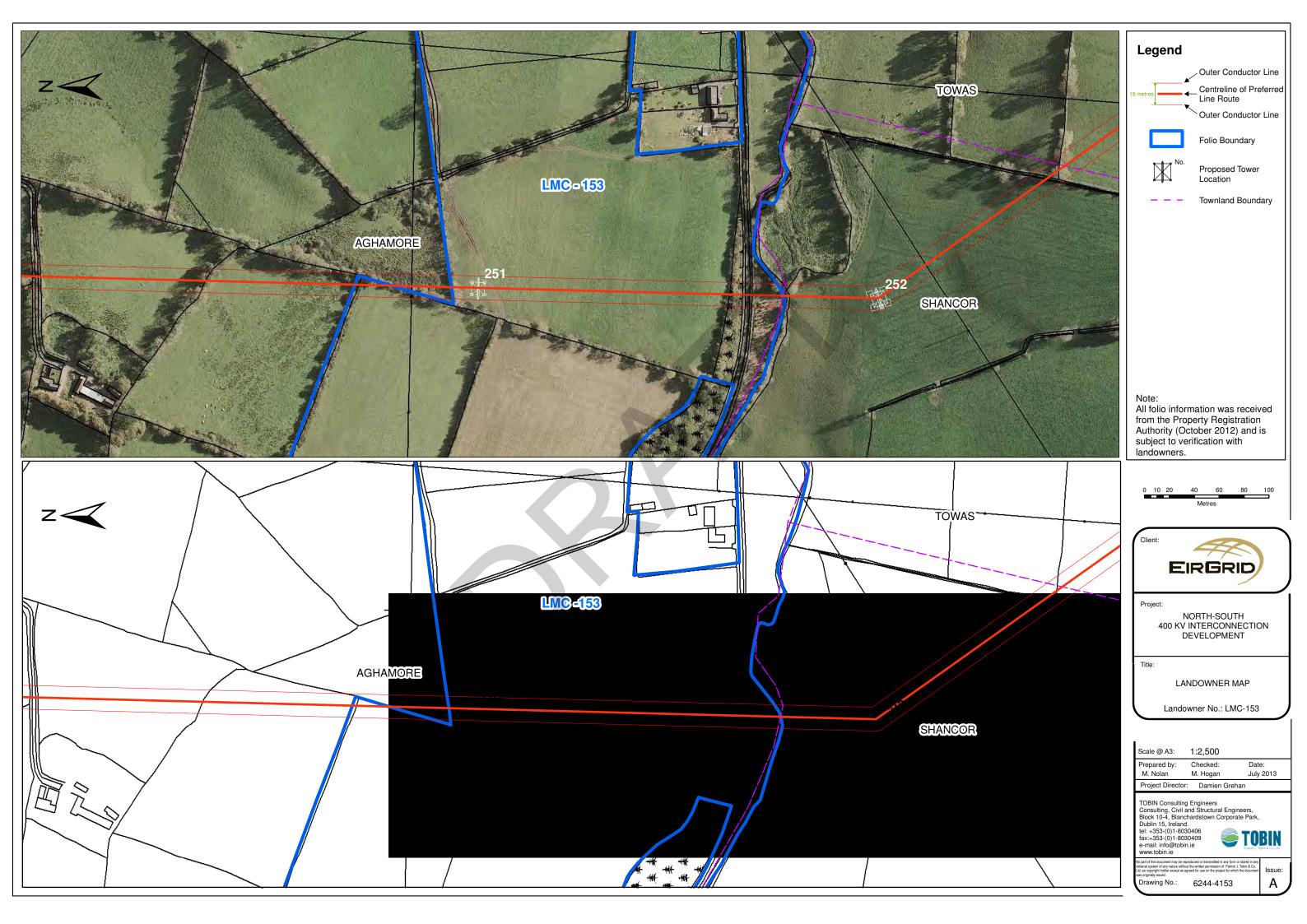
I would encourage you to engage in this consultation process as it is your opportunity to influence how the development will affect you prior to EirGrid finalising the proposal and submitting an application for planning approval. In the meantime, please feel free to contact me. My contact details are included below and details of the upcoming public information days can be found in the enclosed brochures.

Yours sincerely,

Mairead Hogan Tel: + 353 (0)1 8030401/6











## North-South 400kV Interconnection Development

# Landowner Information Brochure July 2013





Phase 2 of Landowner Consultation is now commencing



EirGrid and Northern Ireland Electricity are jointly planning a major cross-border electricity transmission scheme.

This scheme is a 400kV overhead line linking the existing 400kV substation in Woodland, County Meath with

a planned substation in Turleenan, County Tyrone and will provide a second high capacity electricity transmission line between Ireland and Northern Ireland. EirGrid will in due course apply for planning approval for that part of the scheme located in Ireland called the North-South 400kV Interconnection Development.

EirGrid is commencing the second phase of its landowner engagement strategy

## Landowner Engagement

EirGrid is committed to providing an accessible, meaningful and accountable consultation process. The engagement process has three phases:

## Phase 1- Indicative Route (Completed)

Phase 1 of the landowner engagement process took place from May to July 2011. In this phase, all landowners were issued with maps showing the **Indicative Route** of the line as then envisaged on their property. EirGrid agents also sought to meet with each landowner to obtain feedback, confirm ownership, discuss the possible positioning of towers and gain access for environmental and/or technical surveys, where applicable.





## Phase 2 - Preferred Line Route (Current Phase)

The second phase of landowner consultation is now commencing on the **Preferred Line Route**, **proposed tower locations**, **construction access routes**, and other matters related to the project. All affected landowners, have been issued with updated maps outlining the above information and they will have an opportunity to comment and suggest changes to certain aspects of the proposal.

The consultation period will run for a period of eight weeks, from Tuesday, 16th July 2013 to Monday, 9th September 2013. This is the final formal consultation period prior to the submission of an application for planning approval to An Bord Pleanála.

There are several ways for you to engage with EirGrid:

- Contact your dedicated landowner agent (contact details are provided in your landowner letter).
- A **Change Request Form** is provided with this brochure, see page seven for further details.
- EirGrid is hosting a series of **Open Days** for the general public and landowners to provide their feedback on the project. For details of the Open Days planned in your area, please refer to the Community Update Brochure.
- Our Navan Information Centre is open every Tuesday from 12 noon to 7pm, our Carrickmacross Information Centre every Wednesday from 12 noon to 7pm and our Kingscourt Information Centre every Thursday from 12 noon to 7pm.
- Feedback can also be provided by post to:
   C/O EirGrid NS Project Manager, West Pier Business
   Campus, Dún Laoghaire, Co. Dublin, by email
   to northsouth@eirgrid.com or by phone to
   1890 25 26 90 (Mon-Friday 9am to 5pm).

EirGrid will assess all feedback received during Phase 2 and, where possible, incorporate feedback into the proposal to be submitted to An Bord Pleanála for planning approval.

Note: EirGrid will not be seeking permission in its application to move tower positions post-planning (previously referred to as "micro-siting").

## Phase 3 - Final Proposal

In Phase 3 landowners will be informed of the final proposal that EirGrid is submitting to An Bord Pleanála for approval. Landowners will receive maps and information confirming the route and tower locations included in the application for approval as well as information on the statutory consultation phase.



### Compensation

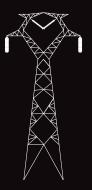
In the event that the proposed development receives planning approval and proceeds to construction, losses incurred by the owner of lands on which the line is constructed will be compensated by means of a statutory compensation process, where appropriate.

## **Preferred Project Solution**

EirGrid has now published the Preferred Project Solution Report for the project. The report is available on the project website: **www.eirgridprojects.com** or alternatively by contacting any member of the project team. Contact details are provided on the back page of this brochure.

## **Overhead Line Design**

As stated in the Preferred Project Solution Report, the new interconnector circuit shall generally take the form of a single circuit 400kV AC (alternating current) overhead line (OHL). An overhead transmission line is made up



#### Intermediate or Suspension Tower

These support the conductors (wires) on straight sections of the line route.

Typical Height: 27 - 43m

Footprint Range: **6.4 x 6.4m to 11 x 11m** 



### Angle/Tension Tower

These are used where the line route changes direction.

Typical Height: 24 - 37m

Footprint Range: **7.4 x 7.4m to 12 x 12m** 



#### Transposition Tower

Only two of these are proposed. They are required in order to improve the operating performance of the line.

Typical Height: **37 - 56m** 

Footprint Range: **5.5 x 5.5m to 8.5 x 8.5m**  of a number of elements, including conductors (wires), shieldwires, insulators and supporting structures. There are three types of towers proposed for this project. The height and footprint of each tower is dependent upon the tower type and the terrain over which the line passes. If you would like additional information on the size of the towers, if any, currently proposed for your land, please contact your dedicated landowner agent.

At 400kV, the conductors are required to be a minimum of 9 metres above ground. The distance between towers is known as the "span", and the length of the span is dependent on the terrain over which the line is to cross. The average span will be about 350 metres.

The preferred line route will also utilise nine existing double circuit towers on the approach to Woodland substation. These towers can carry two separate circuits and one side is currently unused and available for the North-South 400kV Interconnection Development.

## Guidelines for Overhead Line Design and Tower Positioning

The current preferred line route is designed in accordance with national and international standards and best practice.

In designing the preferred line route, landowner considerations, as well as technical and environmental constraints, have been considered. The guiding principles for positioning the towers are explained in detail in the Preferred Project Solution Report. Some of the considerations are outlined below. As part of this phase of landowner consultation, EirGrid is seeking your feedback on the line route and proposed tower locations.

#### Landowner Considerations

• Minimise disturbance to current land use, farm and land management practices.

#### **Technical Considerations**

- Meet the line design requirements and technical limits of the proposed tower, such as span length and clearance height.
- Avoid sharp changes in direction in the line and minimise the number of angle towers required where possible.

#### **Environmental Considerations**

- Avoid known ecologically sensitive areas where possible. (e.g. SAC/cSAC/pNHA/NHA/SPAs).
- Cause least disturbance and minimise impacts to natural heritage interests (including watercourses) and cultural heritage interests.
- Avoid sites of potential ecological importance, e.g. hedgerows and wetlands. Only site towers on hedgerows if the impact can be assessed by survey and appropriate mitigation measures identified.
- Integrate the line into the landscape where possible.
- Where possible, achieve a lateral clearance of 50m from the centre line to nearest dwelling and, on the grounds of general amenity, avoid routing close to residential areas.

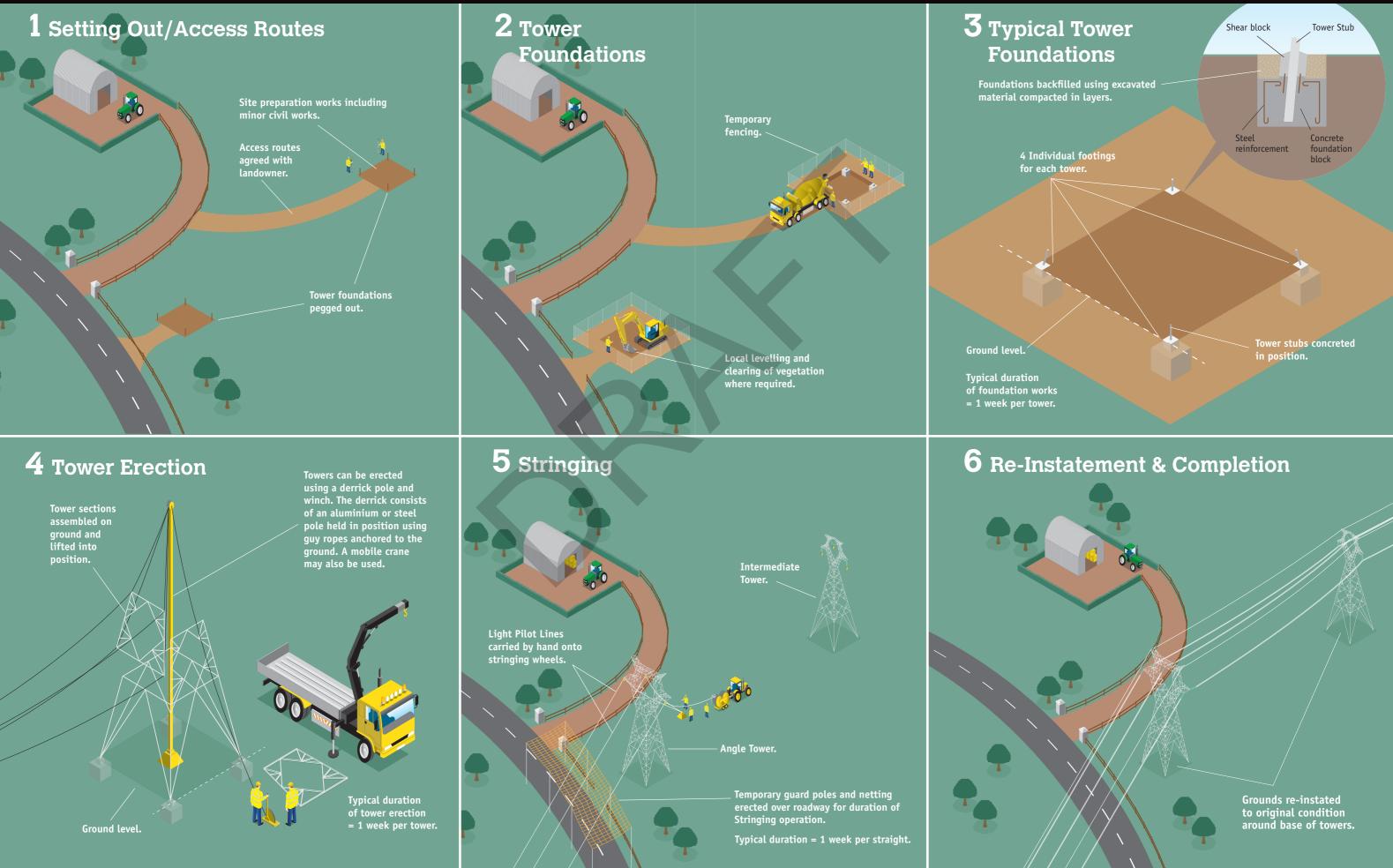


(For illustrative purposes only)

It should be noted that the construction methodology outlined below is indicative only and is based on EirGrid's and ESB Networks' experience of similar transmission line projects. Where there are site specific issues, for example poor ground conditions or unique planning conditions, then alternative methodologies are likely to be required.

In all cases, EirGrid will work with landowners to agree access routes and to minimise disruption.

Individual tower sites will be separated by an average of 350m and access to the sites will be required for short periods during each phase of construction.



## Guidelines for Identifying Construction Access Routes

In identifying indicative construction access routes EirGrid seeks to minimise the environmental impact and the impact on farm and land management practices. These indicative temporary access routes will be approximately 4 metres in width to cater for the construction vehicles. Where possible, landowner preferences will be accommodated and existing access routes will be utilised.

The guiding principles used in the identification of access routes are explained in detail in the **Preferred Project Solution Report** and a summary is provided below.

#### Landowner Considerations

- Minimise disturbance to current land use and farm and land management practices.
- Take appropriate precautions to protect animal welfare and crop fertility by avoiding the spreading of diseases and noxious and invasive plants between farms.

#### **Technical Considerations**

- Maximise use of existing farm entrances, farm tracks/ roads and bridges, where possible.
- The use of private accesses to residential properties should be avoided wherever possible for safety and amenity reasons.

#### **Environmental Considerations**

- Avoid sensitive areas where possible (e.g. SAC/cSAC/pNHA/NHA/SPAs).
- Cause least disturbance, and minimise impacts, to natural heritage interests (including watercourses) and cultural heritage interests.
- Minimise the amount of new temporary entrances, and access tracks/roads, where possible.
- Minimise intrusion and disturbance to the surrounding area and local communities.

Where applicable, an aerial map(s) detailing the proposed indicative access routes for construction purposes are included in your landowner pack. As part of this phase of landowner consultation we are seeking your feedback on the suitability of these indicative access routes.

### How You Can Influence the Line Design

EirGrid is seeking to minimise disturbance to current land use and farm management practices and is seeking your feedback. You can provide feedback to your designated landowner agent or by contacting our dedicated project information service or in writing using the Change Request Form provided on page seven of this brochure.

In addition, if you would like an agricultural advisor to meet with you in order to carry out an assessment of the impact that the proposal may have on your farm practice, please advise through one of the methods listed above.

In order for your proposed modification to be adopted it must:

- Meet general line design requirements.
- Not create greater impact for adjoining dwellings/ sensitive receptors, and
- Tower and line movements should be confined to the landowner property, where possible unless otherwise agreed with adjoining landowners.

All reasonable line route and tower movement requests will be considered and assessed. A balanced judgement will be made, based on technical and environmental considerations and the results of this assessment will be communicated to you.

Approved change requests will be incorporated into the final proposed development which will be submitted for planning approval to An Bord Pleanála. As indicated previously EirGrid will not be seeking flexibility in the application to move tower positions post-planning.

Please submit your feedback to the Project Team by 9th September 2013.



## Landowner Change Request Form



Reference Number:						(As Issued by EirGrid)
Name:						
Address:						·
Telephone:				Email:		
Preferred Method of C	ontact:	a) post	b) phone			
		c) email	d) visit			
1 Is the extent of vo	ur land holdi	ng (along the pr	oforrad line r	oute) corr	act on th	e maps you have received?
Yes						pace provided for feedback below)
2. Would you like to r	neet directly	with EirGrid?				
Yes		No				
3. Would you like an a	agricultural a	dvisor to carry o	ut an assess	ment of th	e impact	the proposal may have on your farm practices?
Yes		No				
-	ccess for an e		ld survey of	your prope	erty so th	at EirGrid can assess any change request made
Yes		No				
5. Do you have any fe	edback on th	ne proposed line	route, tower	locations	or indica	tive access routes detailed on the map?
Yes	(Please	e provide details	in the space	provided b	pelow)	
No						
Feedback/Details of P	roposed Char	nge(s):*				
		*				
Reason(s) for Request	ted Change(s)	):				

\* (Note – If you wish, please return the landowner map included with your pack, marked with your proposed modification. A copy of the map will be reissued to you upon receipt)

Return to : C/O EirGrid NS Project Manager, Block 2, Floor 2, West Pier Business Campus, Dún Laoghaire, Co. Dublin.

### **About EirGrid**

EirGrid, a state-owned company, is the national operator of the electricity transmission grid.

The national transmission grid is an interconnected network of high voltage power lines and cables, comparable to the motorways, dual carriageways and main roads of the national road network. It is operated at three voltage levels; 400kV, 220kV and 110kV and is approximately 6,400km in overall length within Ireland.

It is the backbone of Ireland's electricity system and is vital to ensuring that all industrial, commercial and residential customers from both rural and urban areas have a safe, secure, reliable, economic and efficient electricity supply.

#### **Contact Details**

Write: C/O EirGrid NS Project Manager, Block 2, Floor 2, West Pier Business Campus, Dún Laoghaire, Co. Dublin, Ireland.

Phone: Lo-call 1890 25 26 90 (9am to 5pm Monday to Friday)

Email: northsouth@eirgrid.com

Website: http://www.eirgridprojects.com/projects/ northsouth400kvinterconnectiondevelopment

Visitor Information Centres open as follows until 5th September 2013 or by appointment:

Navan Every Tuesday from 12 noon to 7pm 10a Kennedy House, Kennedy Road, Navan, Co. Meath.

Carrickmacross

Every Wednesday from 12 noon to 7pm Carrickmacross Workhouse, Shercock Road, Carrickmacross, Co. Monaghan.

**Kingscourt** Every Thursday from 12 noon to 7pm Dun A Ri House Hotel, Station Road, Kingscourt, Co. Cavan.



Part Funded by the EU-TEN-E Initiative



www.eirgridprojects.com

Grid25 is EirGrid's ongoing development plan to deliver a sustainable, competitive and secure electricity supply to homes, business and industries. Grid25 will also help us meet our target of 40% of our energy supply coming from sustainable Irish sources.

## North-South 400kV Development Check List/Record For Surveyor's Preliminary Visit



1) Line:	2) Landowner	2) Landowner No						
3) Name(s) and address of landowner(s)								
4) Telephone No	Mobile No							
Name(s) of person(s) interviewed (if not the person at (3) above)								
Relationship of interviewee to the landowner								
6) Was Survey Letter dated and received?		Yes	No 🗌					
7) Was the name and address correct on it?		Yes 🗌	No 🗌					
8) Who else has any legal interest in the land as (joint) owner or oc	cupier, e.g. wife,	partner, agent?						
9) Name and address of occupiers(s) if any;								
10) Is the extent of the holding (along the route) correct on map?		Yes 🗌	No 🗌					
11) Is there bloodstock, bulls or need for special care, e.g. precaution	-		nd Bovine Tuberculosis? No 🗌					
12) Is there restriction on access for survey, i.e. particular fields / an		_	No 🗌					
13) Is there restriction on the use of transport on lands during surve	ey?	Yes	No 🗌					
14) Are there any shelter belts, trees or shrubs of amenity value affe	cted by the route	e? Yes	No 🗌					
If yes, give details								
15) Is there any objection to; (a) to walkover surveys Yes (b) to line route Yes (c)	No 🗌							
16) (a) Is there any particular spot(s) on the route where a mast wo	uld be obstructive	e?						
Yes No No								
(b) Are there any comments in relation to the proposed construction access routes and works areas?								
(c) Were other construction related issues discussed e.g. drainage, services, soil disposal?								
17) Is the landowner aware of the Code of Practice for Survey, Construction rights of landowners as agreed between the ESB and the I.F.A.?	ruction and Maint	enance of overhea Yes 🗌	d lines in relation to the No 🗌					
18) Was there any query left without satisfactory answer?		Yes	No 🗌					
Signed on Behalf of EirGrid:								
Signed on Behalf of Owner/Occupier:		Dat	e					
Any further queries may be addressed to:	Notes:							
EirGrid NS Project Manager, Block 2, Floor 2,								
West Pier Business Campus, Dún Laoghaire, Co. Dublin.								

## APPENDIX I (iv)

Phase 3 Landowner modification rejection letter



ESB International, Stephen Court, 18–21 St. Stephen's Green, Dublin 2, Ireland. Tel: +353 (0) 1 703 8000 Fax: +353 (0) 1 703 8088 Email: marketing@esbi.ie Web: www.esbi.ie

Name Address Address Address

#### Landowner Ref:

Date: 12<sup>th</sup> December 2013

#### Re: North-South 400kV Interconnection Development

#### Dear Name

I refer to the change request that you submitted to EirGrid in respect of this development. EirGrid would like to thank you for participating in the public consultation process that commenced on the 16<sup>th</sup> July 2013 following publication of the Preferred Project Solution Report.

Your change request, along with the numerous other similar requests that were received, has been considered and assessed in accordance with the guidelines set out in the Landowner Information Brochure that was sent to you in July.

I regret to inform you that, having carefully considered the matter, it is not possible to accommodate your requested modification as it would result in the requirement for an additional tower which would create an overall increase in environmental impact. I would like to meet with you in order to explain in greater detail why it was not possible to accommodate your request and will endeavour to contact you in the coming days to arrange a meeting. In the meantime if you would like to contact me directly, my details are outlined below.

EirGrid has now published its Proposed Final Line Route which will form the basis of a planning application to be submitted to An Bord Pleanála in early 2014.

For your information, I enclose with this letter:-

- an aerial map or map(s) showing the proposed final line route and any proposed tower locations on your lands;
- where applicable, an aerial map or map(s) detailing proposed indicative access routes for construction purposes;
- information on the current status of the project;

Should you have any queries or require any further information please do not hesitate to contact me.

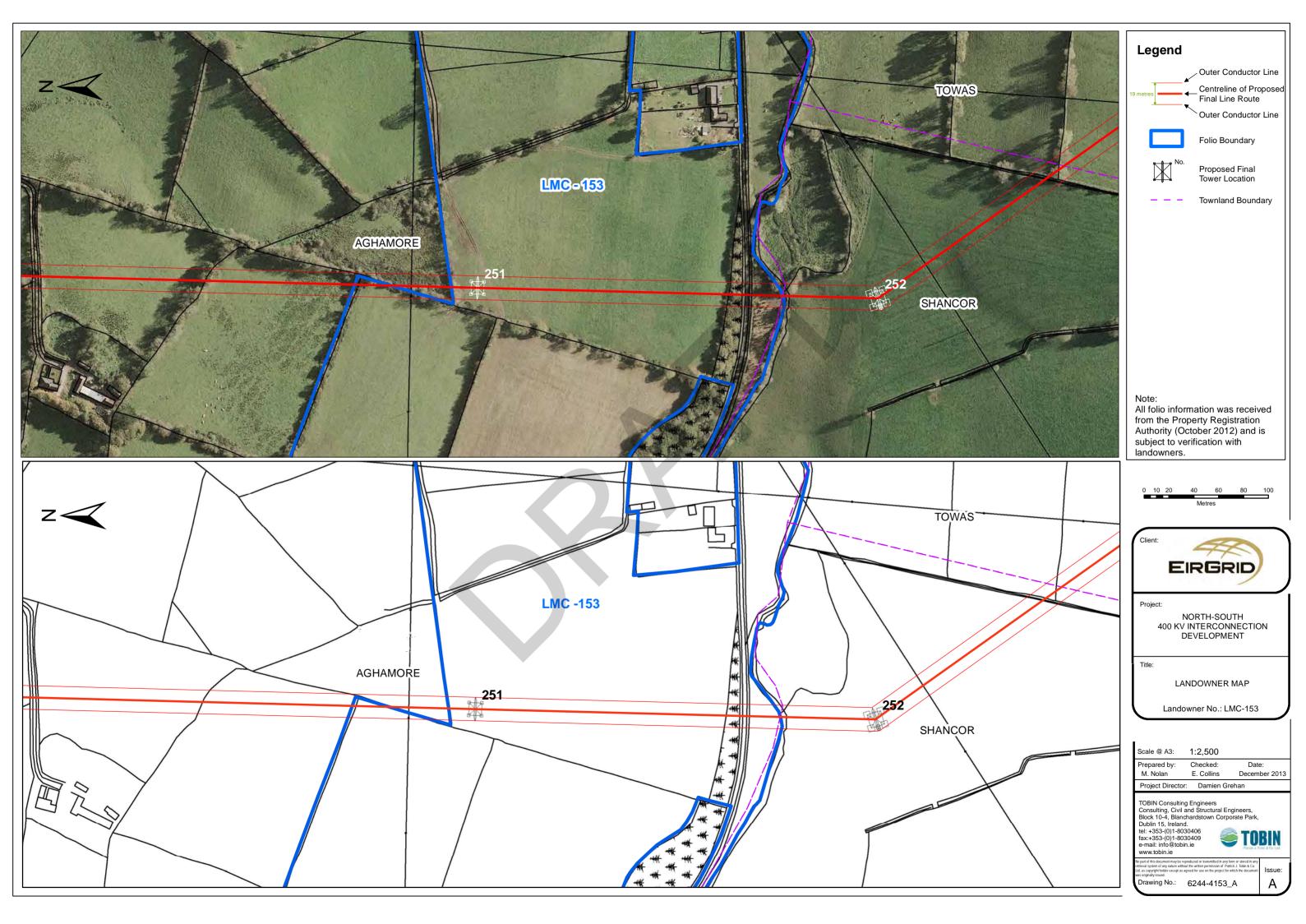
Yours sincerely,

Kevin Coffey ESB International 087 9370681

ESB International is a trading name of ESBI Engineering & Facility Management Limited.

Directors: Geny Tallon, John Redmond, Michael O'Brien, Oliver Brogan. Registered Office: Stephen Court, 18–21 St. Stephen's Green, Dublin 2, Ireland. Registered in Ireland No. 155249





## APPENDIX J

Community Update Newsletter (December 2013)

## North-South 400kV Interconnection Development Community Update Newsletter – December 2013



#### **The Project**

EirGrid and Northern Ireland Electricity (NIE) are jointly planning a major cross-border electricity transmission scheme. This scheme is a 400kV overhead line linking the 400kV substation in Woodland, County Meath with a planned substation in Turleenan, County Tyrone and will provide a second high-capacity electricity transmission line between Ireland and Northern Ireland. EirGrid will shortly apply for planning approval for that part of the scheme located in Ireland called the North-South 400kV Interconnection Development.

#### What has happened recently?

In July 2013 EirGrid published its "Preferred Project Solution Report". This was then followed by an eight-week period of public consultation during which time EirGrid invited stakeholders to provide feedback on the topics covered in the report and for their views on issues and environmental topics to be addressed in the Environmental Impact Statement (EIS) that will accompany the application for planning approval.

Numerous requests were received from stakeholders, mostly from landowners, for changes to the line design. These have been assessed in accordance with the criteria set out in the "Preferred Project Solution Report" and many have been accommodated. Where appropriate, this has resulted in a change to the line design.

#### What is happening now?

EirGrid has now published its proposed final line route which alignment will form the basis of an application for planning approval which will be submitted to An Bord Pleanála. This takes account of the changes arising from the modifications requests. Landowners will receive maps showing how the proposal affects their landholdings.

Maps showing the proposed final line route are also available for viewing by all stakeholders on the project website at **www.eirgridprojects.com/projects/NorthSouth400kVInterconnectionDevelopment** 

EirGrid has asked An Bord Pleanála to provide a scoping opinion on what topics should be addressed in the EIS. This is a formal process which requires An Bord Pleanála to review the proposal as set out in the Preferred Project Solution Report and to seek input from relevant prescribed bodies on what should be included in the EIS.

It is expected that following receipt of the EIS scoping opinion from An Bord Pleanála EirGrid will be in a position to submit the EIS and the application for planning approval in early 2014.

Before the application is submitted EirGrid will place planning notices in national and local newspapers to inform the public of its intention to do so. These notices will also advise of the locations and times when the application can be inspected. Members of the public and landowners may make submissions directly to An Bord Pleanála during this same period.

An Bord Pleanála is the competent authority that will complete the Environmental Impact Assessment and determine the outcome of the planning application.

#### For further information on the project, you may contact us in the following ways:

Write: c/o EirGrid NS Project Manager, Block 2, Floor, 2, West Pier Business Campus, Dun Laoghaire, Co. Dublin, Ireland

Phone: Lo-call 1890 25 26 90 Email: northsouth@eirgrid.com

Website: http://www.eirgridprojects.com/projects/northsouth400kVinterconnectiondevelopment

Make an appointment to visit us at our local information centres which are available by appointment:

NavanCarrickmacross10a Kennedy House, Kennedy Road,<br/>Navan, Co. Meath.Carrickmacross Workhouse, Shercock Road,<br/>Carrickmacross, Co. Monaghan.

Kingscourt

Dun A Ri House Hotel, Station Road, Kingscourt, Co. Cavan.



## APPENDIX K

Community Update Brochure (July 2014)







North-South 400kV Interconnection Development

# **Community Update**

July 2014





Part Funded by the EU-TEN-E Initiative



Update on recent developments and next steps for the project



### **Overview**

EirGrid and System Operator Northern Ireland (SONI) are jointly planning a major cross-border electricity transmission development. EirGrid is preparing a planning application for An Bord Pleanála (ABP) for the portion of the overall development within Ireland, which runs from a substation at Woodland, Meath to the border at Lemgare, Monaghan. The planning of that portion of the proposed interconnector within Northern Ireland was originally undertaken by Northern Ireland Electricity (NIE). The NIE planning function has since been transferred to SONI.

## **Project Drivers**

#### Improve competition

This project will improve the efficiency of the all-island electricity market.

#### Ensure a secure supply of electricity

This project will enhance the security of the electricity supply throughout the island of Ireland which is essential for economic growth, the creation of jobs and improving the standard of living and quality of life for all.

#### Help Ireland meet its 40% renewable electricity target

This project will allow more renewable energy to be connected to the network, reducing our production of greenhouse gasses and our reliance on imported fossil fuels.

## **Project Update**

#### An Bord Pleanála (ABP)

In August 2013, EirGrid requested ABP to provide a scoping opinion on the Environmental Impact Statement (EIS) for the development. ABP consulted with various parties, including the local and prescribed authorities, as well as statutory agencies in Northern Ireland, before providing its scoping opinion to EirGrid on 11th December 2013 - see http://www.pleanala.ie/casenum/VS0002.htm

Following meetings between EirGrid and ABP to determine whether the project is or is not strategic development, ABP published its decision on the 6th February 2014, finding that:

• the proposed development constitutes strategic infrastructure development,

- an EIS is required to accompany the application, and
- significant effects are likely on the environment in a trans-boundary state (Northern Ireland).

#### **Project of Common Interest**

In October 2013, the European Commission designated the overall cross-border development as a Project of Common Interest (PCI). The project is now subject to a new EU regulation that is designed, among other things, to facilitate a faster and more efficient permit granting process. ABP has been designated as the competent authority for managing the PCI process in Ireland and will draw up a schedule for the permit granting process in accordance with the regulation. The pre-application procedure associated with the PCI process commenced on July 2nd 2014 and EirGrid will in due course submit an application for planning approval to ABP.

#### The Environmental Impact Statement (EIS)

EirGrid is now preparing an EIS. This involves a large number of specialists evaluating how the proposed development would interact with the human and natural environment, including any issues of a cross-border nature. As part of this process, potential impacts across a wide range of environmental areas are identified.

The evaluation requires that in the case of each of the identified areas, the baseline conditions be recorded, potential impacts assessed and, where possible, mitigated against using best international practice. For example, the routing of any infrastructure is guided by the principle of mitigation by avoidance. The EIS is being prepared in accordance with the scoping opinion that was provided by ABP. It will also be informed by the feedback received during the public consultation of July to September 2013.

#### Independent Expert Panel

In January 2014 the Government appointed an Independent Expert Panel to review EirGrid's evaluation of underground routes for the Grid West and Grid Link projects. In addition, the panel was asked to provide an opinion on "the compatibility of the methodologies to be employed on the Grid Link and Grid West projects with what has already been done on the North South Transmission Line project." In July 2014 the panel provided its opinion which is that the work completed to date on the North-South 400kV Interconnection Development is compatible with the methodologies now being employed on the Grid West and Grid Link projects.





## **EirGrid's Project Development & Consultation Roadmap**

The North-South 400kV Interconnection Development is currently in Stage Four: Prepare Planning Application phase of the EirGrid roadmap.

### We are Here







### Grid25 – Overview of the National Grid Development Strategy

Grid25 is EirGrid's strategy to develop Ireland's electricity transmission system. The strategy aims to support economic growth and job creation.

It facilitates a reliable supply of electricity for all consumers, providing the infrastructure to enable Ireland to realise its renewable potential and achieve the challenging target of delivering 40% of electricity generated from renewable sources by 2020.

The Government policy statement on the *Strategic Importance of Transmission and Other Energy Infrastructure 2012* specifically endorses and supports the Grid25 development strategy. It reaffirms that Grid25 is Government policy and in the national interest.

#### The Development

The proposed interconnector is a 400kV overhead line linking a substation in Woodland, County Meath with a planned substation in Turleenan, County Tyrone. Given its location across two jurisdictions, the proposed interconnector consists of two related and complementary developments:

- 1) The SONI proposal for that portion of the project located in Northern Ireland
- 2) A development being proposed by EirGrid for that portion of the project located in Ireland.



#### In Ireland the development comprises

- A new single-circuit 400kV overhead transmission line in Monaghan, Cavan and Meath
- A new 400kV circuit along the unused northern side of the existing Oldstreet to Woodland 400kV double circuit line
- Associated works in and adjacent to the Woodland substation in Meath
- An associated temporary construction material storage yard in County Monaghan
- Associated permanent and temporary construction and excavation works





## Alternative Routes Considered

In December 2013 EirGrid published its final line route for the project that will form the basis of a planning application that will be submitted to ABP. The final route took account of requests from stakeholders - mostly landowners - for localised changes to the line design. These were evaluated in accordance with the criteria set out in the Preferred Project Solution Report, published in July 2013, and many were accommodated.

This was the final instalment in a process dating back to 2007, when EirGrid first published a number of route corridor options. Two years later, in April 2009, following a review of all project documentation, including consultants' studies, reports, and consultation feedback, EirGrid nominated one preferred route corridor for further study.

The preferred route corridor struck the best balance between the competing priorities of community concerns, environmental issues and the technical aspects of the project. The indicative line route in the preferred route corridor was then taken forward to the next phase of project development, involving discussions with landowners, further studies and stakeholder engagement.

Following the withdrawal of an earlier planning application in 2010, EirGrid commenced a comprehensive review of the project. The preliminary findings of the review were published in May 2011 in a Preliminary Re-Evaluation Report. The report included a review of key project documentation, including consultants' studies, reports and feedback from earlier public consultation - including submissions made to ABP. It identified an indicative project solution, which substantially followed the route which formed the basis of the original application.

#### **Underground Options**

Since the project commenced numerous studies have been undertaken regarding options for overhead lines and underground cables, including an International Expert Commission, appointed by the Government.

- Ecofys Study (2008)
- TEPCO Technical Study (2009)
- PB Power Report (2009)
- TransGrid Study (2009)
- International Expert Commission Report (2012)
- PB Power Technology and Costs Update Report (2013)

In July 2014, a Government-appointed Independent Expert Panel provided its opinion on whether EirGrid had adequately examined an underground option for the interconnector. The panel compared the work to date on the project with its recently formulated terms of reference for EirGrid's Grid West and Grid Link projects. It found that, in all material respects, the studies and work undertaken on the interconnector project is compatible with the methodologies now being employed on the Grid West and Grid Link projects.





## About EirGrid

EirGrid is a state-owned company and is the national operator of the electricity grid. The national grid is an interconnected network of high-voltage power lines and cables, comparable to the motorways, dual carriageways and main roads of the national road network. It is operated at three voltage levels; 400kV, 220kV and 110kV and is approximately 6,400km in overall length. It is the backbone of Ireland's power system and is vital to ensuring that all customers; industrial, commercial and residential from both rural and urban areas have a safe, secure, reliable, affordable and efficient electricity supply. EirGrid and SONI (System Operator for Northern Ireland) are jointly proposing this new high capacity electricity interconnector between the electricity networks of Ireland and Northern Ireland. Currently there is only a single such interconnector between the two networks and a second interconnector is now proposed.

EirGrid also owns SONI Limited (SONI), the System Operator of Northern Ireland. SONI is the applicant for planning approval for that part of the proposed interconnector within Northern Ireland. The Single Electricity Market Operator (SEMO) is the market operator of the all-island wholesale electricity trading system. SEMO is a joint venture between EirGrid and SONI. EirGrid operates and develops the national electricity grid power system, providing services to all users of the electricity transmission system. This includes all generators, suppliers, and high voltage customers.

### **Contact Details**

For further information on the project, you may contact us in the following ways:

Write: c/o EirGrid NS Project Manager, Block 2, Floor, 2, West Pier Business Campus, Dun Laoghaire, Co. Dublin, Ireland

Phone: Lo-call 1890 25 26 90 (9am to 5pm Monday to Friday)

Email: northsouth@eirgrid.com

Website: http://www.eirgridprojects.com/projects/ northsouth400kVinterconnectiondevelopment

Make an appointment to visit our information centres:

Navan: 10a Kennedy House, Kennedy Road, Navan, Co. Meath

**Carrickmacross:** Carrickmacross Workhouse, Shercock Road, Carrickmacross, Co. Monaghan

**Kingscourt:** Dun a Ri House Hotel. Station Road, Kingscourt, Co. Cavan

### **Information on the PCI Process**

An Bord Pleanála, the competent authority for managing the PCI process in Ireland, has published a Manual of Permit Granting Process Procedures which can be viewed at http://www.pleanala.ie/publications/index.htm The EU Commission PCI website can be accessed at http://ec.europa.eu/energy/infrastructure/pci/pci\_en.htm.

For information on the Regional Group Meetings please go to https://circabc.europa.eu. Then select (in sequence) Browse Categories, Energy, 13 Regional Group Meetings and Library.



Part Funded by the EU-TEN-E Initiative





#### www.eirgridprojects.com

Grid25 is EirGrid's ongoing development strategy to deliver a sustainable, competitive and secure electricity supply to homes, business and industries. Grid25 will also help us meet our target of 40% of our energy supply coming from sustainable Irish sources.

## APPENDIX L

PCI Public Information Leaflet

## APPENDIX M

Community Update Brochure