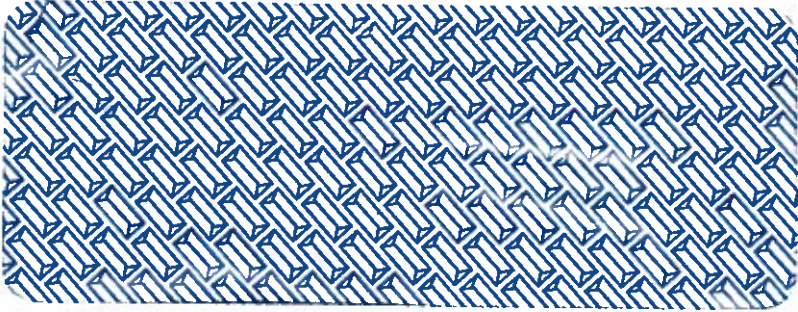


Des

Ser Kalkan

RECEIVED
16 DEC 2013



San Haval Piyembla
Ed Sulu Nambulu
Raha, Yaka, Chaka 1
Tel: 001 808 8198
Fax: 001 812 224
E-mail: 001 808 273 113
E-Post: 001 808 273 113
Ed Haval Piyembla
001 808 8198



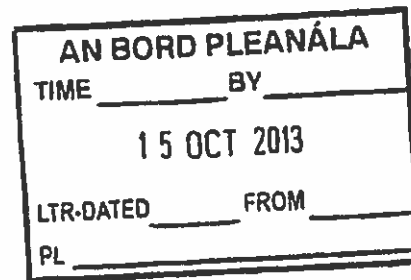
**An Roinn
Ealaíon, Oidhreachta agus Gaeltachta
Department of
Arts, Heritage and the Gaeltacht**



Our Ref: **G Pre00012/2013** (Please quote in all related correspondence)
Your Ref: **02.VS0002**

15 October 2013

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1



Re: **North-South 400kV Interconnector**

A Chara

On behalf of the Department of Arts, Heritage and the Gaeltacht, I refer to your recent correspondence – both hard copy and electronic - in relation to the above.

Outlined below are the observations of the Department in relation to nature conservation.

With regard to the scope of the Environmental Impact Statement for this proposed development an ecological survey should be carried out of the route to survey the habitats and species present. Where ex-situ impacts are possible survey work may be required outside of the development sites. Such surveys should be carried out by suitably qualified persons at an appropriate time of the year depending on the species being surveyed for. The EIS should include the results of the surveys. Inland Fisheries Ireland should be consulted with regard to fish species if applicable. With regard to any existing records the data of the National Parks and Wildlife Service (NPWS) should be consulted at www.npws.ie and the data of the National Biodiversity Data Centre at <http://www.biodiversityireland.ie/> . Reference should be made to the National Biodiversity Plan and any relevant County Biodiversity Plan. The EIS should also address the issue of invasive alien plant and animal species, such as Japanese Knotweed, and detail the methods required to ensure they are not accidentally introduced or spread during construction. Information on alien invasive species in Ireland can be found at <http://invasives.biodiversityireland.ie/> and at <http://invasivespeciesireland.com/> .

The impact of the development on the flora, fauna and habitats present should be assessed. In particular the impact of the proposed development should be assessed, where applicable, with regard to:

- Natura 2000 sites, i.e. Special Areas of Conservation (SAC) designated under the EC Habitats Directive (Council Directive 92/43/EEC) and Special Protection Areas designated under the EC Birds Directive (Directive 2009/147 EC);

- Other designated sites, or sites proposed for designation, such as Natural Heritage Areas, Nature Reserves and Refuges for Fauna or Flora, designated under the Wildlife Acts of 1976 and 2000;
- Habitats listed on annex I of the Habitats Directive;
- Species listed on Annexes II and IV of the Habitats Directive;
- Habitats important for birds;
- Birds listed on Annex I of the EC Birds Directive;
- Species protected under the Wildlife Acts including protected flora;
- Habitats that can be considered to be corridors or stepping stones for the purpose of article 10 of the Habitats Directive;
- Red data book species; and
- Biodiversity in general.

In order to assess the above impacts it may be necessary to obtain hydrological and/or geological data. In particular any impact on water table levels or groundwater flows may impact on wetland sites some distance away. The EIS should assess cumulative impacts with other plans or projects if applicable. Where negative impacts are identified suitable mitigation measures should be detailed if appropriate. As Ireland has to report every 6 years on the National resource of habitats and species listed under the Habitats Directive it is important that any impact on such habitats and species both inside and outside of Natura 2000 sites is recorded.

Where there are impacts on protected species and their habitats, resting or breeding places, licenses may be required under the Wildlife Acts or derogations under the Habitats Regulations. In particular bats and otters are strictly protected under Annex IV of the Habitats Directive and a copy of Circular Letter NPWS 2/07 entitled 'Guidance on Compliance with Regulation 23 of the Habitats Regulations 1997 – strict protection of certain species/applications for derogation licences' can be found on our web site at: <http://www.npws.ie/media/npws/publications/circulars/media.6686.en.pdf>. In addition licenses will be required if there are any impacts on other protected species or their resting or breeding places, such as on protected plants, badger setts or birds nests. Hedgerows should be maintained where possible. Where trees or hedges have to be removed there should be suitable planting of native species in mitigation. The EIS should estimate the length of hedgerow that will be lost, if any. Where possible hedges and trees should not be removed during the nesting season (i.e. March 1st to August 31st). Birds' nests can only be intentionally destroyed under licence issued under the Wildlife Acts of 1976 and 2000. In order to apply for any such licenses or derogations as mentioned above a detailed survey should be submitted to NPWS, which should have been carried out by appropriately qualified person/s.

An Bord Pleanála should note that this Department previously had concerns with the previous planning application of 2009 with regard to the apparent policy of placing towers in hedgerows and lack of complete surveys. Hedgerows form important wildlife corridors as envisaged under Article 10 of the Habitats Directive. They provide areas for birds to nest in and in addition badger setts may be present. If suitable trees are present bats may roost there and they can use hedgerows as flight routes. Hedges also provide a habitat for woodland flora. Where a hedgerow forms a townland or other historical boundary it generally is an old hedgerow and will contain more biodiversity than a younger hedge. While the hedgerow issue has not been clearly identified in section 4.5 of Appendix C of the EirGrid Preferred Project Solution Report July 2013 it has been addressed in table 3.1 of the report.

In addition there were also concerns re wetlands and birds, particularly Whooper Swan as identified in section 4.5 of Appendix C of the EirGrid Preferred Project Solution Report July 2013. Following consultation between EirGrid, their consultants, and members of the National Parks and Wildlife Service (NPWS) of this Dept. in 2012 there has been a commitment that these issues will be addressed.

Should the original survey work take place well before construction commences it is recommended that an ecological survey of the development site should take place immediately prior to construction to ensure no significant change in the baseline ecological survey has occurred. If there has been any significant change mitigation may require amendment and there may be a need for new licence applications with regard to protected species. In such a case NPWS should be consulted.

The applicant should refer to the various circular letters issued by the National Parks and Wildlife Service of this Dept. which can be found at: <http://www.npws.ie/planning/appropriateassessment/> In particular Circular Letter PD 2/07 and NPWS 1/07 on the use of compliance conditions is relevant. In order to allow for a complete assessment, it is essential that any mitigation measures detailed in the EIS and/or NIS form part of a construction management plan which must be implemented by the successful contractor at construction phase. This must be detailed in the EIS/NIS. It is not possible to adequately assess the impact of the project without knowing the minimum standards and mitigation measures that will be in any construction methodology or plans. In particular the methodology to protect water quality should be outlined when diverting field drains or when pumping groundwater which may impact on watercourses some distance away.

In accordance with article 6.3 of the Habitats Directive, this project should be subject to appropriate assessment screening and if necessary appropriate assessment. The applicant is referred to the Departmental guidance document on Appropriate Assessment, which is available on the NPWS web at:

<http://www.npws.ie/media/npws/publications/codesofpractice/AA%20Guidance%2010-12-09.pdf> .

The applicant is also referred to the EU Commission guidance entitled "*Assessment of plans and projects significantly affecting Natura 2000 sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC*"

which can be downloaded from:

http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/natura_2000_assess_en.pdf.

A rule of thumb often used is to include all Natura 2000 sites within a distance of 15km. It should be noted however that this will not always be appropriate. In some instances where there are hydrological connections a whole river catchment or a groundwater aquifer may need to be included.

In order to carry out the appropriate assessment screening and/or prepare a NIS the applicant will need to collect information about the relevant Natura 2000 sites including their conservation objectives. Details of designated sites and species and conservation objectives can be found on www.npws.ie . Detailed, as opposed to generic, conservation objectives are now available for some sites. Where these are not available for a site it is recommended that the applicant looks at the detailed conservation objectives for other sites which have the same qualifying interests. For example if a site without detailed

conservation objectives has Otters as a qualifying interest the applicant could refer to the River Barrow and River Nore SAC detailed conservation objectives to see how otters are treated. The applicant should also note that it is now advised, as per the notes and guidelines in the detailed conservation objectives, that any reports quoting conservation objectives should give the version number and date. This will allow statutory consultees and others assessing reports to be confident that the correct and most up to date version of the conservation objectives is used at the time of writing any report.

It is recommended that the applicant consults with the relevant Local Authorities to determine if there are any projects or plans which alone or in combination could impact on any Natura 2000 site.

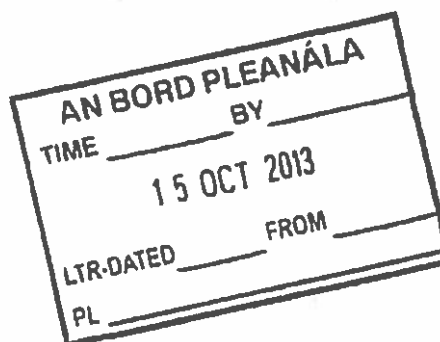
The above observations and recommendations are based on the papers submitted to this Department on a pre-planning basis and are made without prejudice to any observations the Minister may make in the context of any consultation arising on foot of any development application referred to the Minister, by the planning authority, in his role as statutory consultee under the Planning and Development Act, 2000, as amended.

The acknowledgement to this letter, any further information and An Bord Pleanála's decision should ideally be sent to manager.dau@ahg.gov.ie, if this is not possible, correspondence may alternatively be sent to:

The Manager
Development Applications Unit
Department of Arts, Heritage and the Gaeltacht
Newtown Road
Wexford

Is mise, le meas

Muiris Ó Conchúir
Development Applications Unit
Tel: 053-911 7387
e: manager.dau@ahg.gov.ie

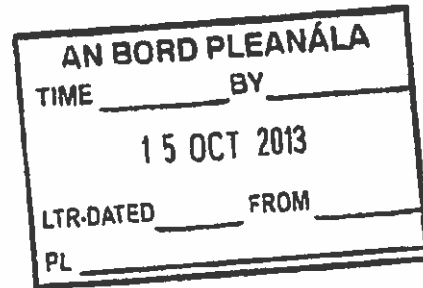


Kieran Doherty

From: Manager Dau <Manager.Dau@ahg.gov.ie>
Sent: 15 October 2013 15:33
To: Kieran Doherty
Subject: RE: Our Ref: G Pre00012/2013 - N-S Interconnector - ltr to ABP 11/10/2013
Attachments: G Pre00012-2013 N-S 400kV Interconnector ltr to ABP re-submitted 15-10-2013.pdf; ATT00001.txt; ATT00002.htm

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged



Our Ref: G Pre00012/2013

Kieran, a chara

Attached is re-submitted as per your email message below.

Le meas

Muiris

Muiris Ó Conchúir

Manager, Development Applications Unit (DAU)
Department of Arts, Heritage & the Gaeltacht
Newtown Road, Wexford
T: 053-911 7387 (direct)
T: 053-911 7500 (Dept main no.)
W: www.ahg.gov.ie

*An tAon
Falamh Oidhreachta agus Gaeltachta
Department of
Arts, Heritage and the Gaeltacht*

From: Kieran Doherty [<mailto:K.Doherty@pleanala.ie>]
Sent: 14 October 2013 16:08
To: Manager Dau
Subject: FW: Our Ref: G Pre00012/2013 - N-S Interconnector - ltr to ABP 11/10/2013
Importance: High

Hello Muiris,

An Bord Pleanála has received the attached submission from the Department of Arts, Heritage & the Gaeltacht. Please note that the last date for submissions was 1st October 2013. As your e-mail was received on 11th October 2013 it cannot be considered by the Board.

However, the Board is of the opinion that the Department's comments should be invited in regard to the scoping request. Therefore, in accordance with section 182E(3) of the Planning and Development Act, 2000, as amended you are invited to re-submit your submission within 4 weeks of this notice.

Thank you for your assistance.
Best regards,
Kieran Doherty
An Bord Pleanála
01 873-7248

From: Manager Dau [mailto:Manager.Dau@ahg.gov.ie]
Sent: 11 October 2013 16:17
To: Bord
Subject: Our Ref: G Pre00012/2013 - N-S Interconnector - ltr to ABP 11/10/2013
Importance: High

Your Ref: 02 VS0002

A Chara

Attached is a letter from this Department in relation to the above.

Le meas

Muiris Ó Conchúir

Manager, Development Applications Unit (DAU)
Department of Arts, Heritage & the Gaeltacht
Newtown Road, Wexford
T: 053-911 7387 (direct)
T: 053 911 7500 (Main Dept No.)
W: www.ahg.gov.ie

*An Boim
Láimh Aidhreachta agus Gaeltachta
Department of
Arts, Heritage and the Gaeltacht*

FÓGRA RUIN: Tá an ríomhphost seo agus aon chomhaid atá nasctha leis faoi rún agus dirthe amháin don seolai. Má bhfuair tú an ríomhphost seo trí earráid, déan teagmháil le bainisteoir an chórais.

Tabhair faoi deara le do thoil: aon tuairimí nochtaithe san ríomhphost seo is iad tuairimí an tseoltóra féin agus níl sé intuigthe gurb iad tuairimí An Bhoird Pleanála nó go gcloíonn siad le polasaithe raithe an Bhoird.

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Please note, any views expressed in this email are those of the individual sender and may not necessarily reflect the views or accord with the stated policies of An Bord Pleanála.

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Iascach Intire Éireann
Inland Fisheries Ireland

Kieran Doherty,
Executive Officer,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1.

AN BORD PLEANÁLA
TIME _____ BY _____
27 SEP 2013
LTR-DATED _____ FROM _____
PL _____

26th September, 2013

Re: North-South 400kV Interconnector

Dear Mr Doherty,

We refer to your letter dated the 3rd September last relating to the above-mentioned proposed development.

Inland Fisheries Ireland (IFI) is a Statutory Body established on the 1st July, 2010. Under Section 7(1) of the Inland fisheries Act 2010 (No. 10 of 2010) the principal function of IFI is the protection, management and conservation of the inland fisheries resource.

Having examined the Preferred Project Solution Report we have the following comments to make.

The preferred route crosses a number of river catchments (Table 1) and has the potential to impact on a wide range of important fisheries waters including areas designated as SACs, angling waters, adult holding areas, nursery and spawning areas, etc., forming parts of the Eastern, Neagh Bann and North Western International River Basin Districts. The potential impacts of the proposed development on fisheries relate largely to the construction of access roads and the towers. Many of the proposed tower sites are located adjacent to smaller watercourses, which act primarily as contributories to downstream habitat for juvenile salmonids, lamprey and other species as well as macrophytes, algae and macroinvertebrates, which as drift form a significant part of the food supply to the downstream fisheries. All of the waters referred to have, in the context of the proposed development, the potential to convey deleterious matter from the works such as silt, concrete, fuel, lubricating fuels and oils from construction plant and equipment downstream unless proper safeguards are in place.

Tower Numbers	RBD	Catchment	River
103-109	Neagh Bann	Monaghan Blackwater	Cor/Clontibret
110-130		Fane	Upper Fane
131-200	North West	Erne	Dromore Knappagh
201-224	Neagh Bann	Glyde	Main channel and tributaries
225-274	Neagh Bann	Dee	Tributaries
275-397	Eastern	Boyne	Main channel and tributaries
398-409	Eastern	Tolka	Tributaries

Table 1. Catchments crossed in proposed development.

27 SEP 2013

All of the above listed catchments contain valuable fisheries habitat with stocks of salmonid and coarse fish. Some of these catchments contain species protected under the Habitats Directive including Atlantic Salmon and Lamprey. The River Boyne and the Kells-Blackwater are proposed SACs with populations of Atlantic Salmon and lamprey.

All natural watercourses which have to be traversed during site development and road construction works should be effectively bridged prior to commencement. If temporary crossing structures are required; IFI approval will be necessary as regards specification and timing of installation. There is sometimes a misconception that in installing temporary crossing structures, the only issue is keeping water flowing from above a temporary crossing to below it. Design and choice of temporary crossing structures must provide for passage of fish and macroinvertebrates, the requirement to protect important fish habitats e.g. spawning and over-wintering areas, as well as preventing erosion and sedimentation.

No crossing (temporary or permanent) on any watercourse shall be installed without the approval of IFI as regards sizing, location, duration and timing. The preferred option is for clear span 'bridge type' structures on fisheries waters. The crossing of watercourses at natural fords is not permitted because of the amount of uncontrolled sedimentation that can be generated. The creation of fords on streams and rivers through the introduction of stone is prohibited.

There are significant variations in the timing and duration of spawning activity throughout the Republic of Ireland. To minimise adverse impacts on the fisheries resource works in rivers, streams and watercourses should normally (except in exceptional circumstances and with the agreement of IFI) be carried out during the period July -September. The appropriate 'window' for instream works can vary depending on the nature of the fishery resource concerned and the existence of other factors such as catchment or sub catchment specific Bye Laws and Regulations.

In terms of stability both during the construction and operational phases it is essential that the soil type and structure at the proposed tower locations and along the route of any proposed access track(s)/road(s) including areas where temporary or permanent stockpiling of excavated material takes place are assessed and critically reviewed. This is particularly important if the areas concerned contain peat soils.

One of the potential impacts of the proposed development is the discharge of silt-laden waters to fisheries streams from newly developed sites at which earth moving and excavation works are ongoing. Silt can clog salmonid spawning beds, and juvenile salmonids are particularly sensitive to siltation of gill structures. Similarly plant and macroinvertebrate communities can be blanketed over, and this can lead to loss or degradation of valuable habitat. It is important to incorporate best practices into construction methods and strategies to minimise discharges of silt/suspended solids to waters.

Uncured concrete can kill fish and macroinvertebrates by altering the pH of the water. Pre-cast concrete should be used whenever possible, to eliminate the risk to all forms of aquatic life. When cast-in-place concrete is required, all work must be done in the dry and effectively isolated from any water that may enter the drainage network for a period sufficient to cure the concrete. Concrete delivery vehicles should be precluded from washing out at locations which would result in a discharge to surface waters. Specific controlled and environmentally safe vehicle washout areas must be provided. If cement is stored on site during construction work, it should be held in a dry secure area when not in use.

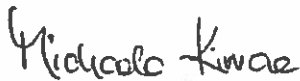
All oils and fuels should be stored in secure bunded areas and particular care and attention should be taken during refuelling and maintenance operations on plant and equipment. Bunding should be

designed to recommended standards. All plant and equipment should carry oil fuel spill kits. Where temporary diesel or petrol driven pumps are required, they should be sited within portable temporary bunded units. Where site works involve the discharge of drainage water to receiving rivers and streams, temporary oil interceptor facilities should be installed and maintained.

No instream works shall be carried out without the written approval of Inland Fisheries Ireland.

In the event of the project proceeding it is the responsibility of the developer and the contractors to ensure that works will not give rise to a discharge of deleterious or polluting matter to waters. At all times the precautionary principle should be applied throughout for the entire development. Particular attention should be paid to the various environmental directives including the Water Framework Directive, the Habitat and Birds Directives, the Fisheries Acts in particular, and the Local Government (Water Pollution) Acts. Other environmental legislation should be considered as appropriate.

Yours faithfully,



Michaela Kirrane
Senior Fisheries Environmental Officer

CC Cormac Goulding (NWIRBD)
Noel McGloin, Gretta Hannigan & Brian Beckett (ERBD)







Date: 6th December 2013

Your Ref: 02_VS0002
Our Ref: M/2013/0509/DETEIA



DOE

Department of
the Environment

(Please quote at all times)

Kieran Doherty
Executive Officer
An Bord Pleanála
64 Marlborough Street
Dublin

Strategic Planning Division
Millennium House
17 – 25 Great Victoria Street
Belfast
BT2 7BN

Contact: Ryan Nolan
Telephone: (028) 9041 6841

Dear Sir,

Response to An Bord Pleanála re: Eir Grid scoping request in relation to North-South interconnector project

I refer to your letter dated 8th November 2013 and accompanying information requesting an opinion as to the information provided in the Environmental Statement to be submitted with an application in respect of the above proposal in the Republic of Ireland.

The Department has consulted:

DRD: Roads Service

NIEA: Natural Heritage

NIEA: Landscape Architect Branch

NIEA: Protecting Historic Monuments

NIEA: Protecting Historic Buildings

NIEA: Land Resource Management

NIEA: Water Management Unit

Rivers Agency

Armagh City and District Council Environmental Health Department

Dungannon and South Tyrone Borough Council Environmental Health Department

To date the Department have received responses from Rivers Agency, NIEA: Protecting Historic Monuments, NIEA: Water Management Unit and NIEA: Landscape Architect Branch. In each instance the applicant should refer to the individual comments (enclosed) for their detailed requirements. If any clarification is required you should liaise with the consultees directly. Further responses will be forwarded in due course. The following information below summarises the responses received to date.

Rivers Agency No comments provided

NIEA Water Management Unit No comments provided

NIEA Protecting Historic Monuments have commented that any Environmental Statement which accompanies this application should include an archaeological

section, or if an ES is not required, they would request an archaeological assessment of the potential impacts of the proposal on the known archaeology and the potential for (and mitigation of) previously unrecorded below ground archaeological remains, as per Policy BH 3 of Planning Policy Statement 6. They have stated that the Cultural Heritage section mentioned in the "Preferred Project Solution Report" should include a comprehensive desk based assessment, field inspection, identification of potential physical and visual impacts upon the historic environment of N. Ireland and recommendations for archaeological mitigation ahead of development.

NIEA Landscape Architect Branch highlighted that the following guidance should be considered. The methodology advocated by "Guidelines for Landscape and Visual Impact Assessment", 3rd edition published April 2013, by the Landscape Institute and Institute of Environmental Management and Assessment. The Landscape Institute Advice Note 1/11: "Photography and Photomontage in Landscape and Visual Impact Assessment" should also be considered

You should also note that this opinion does not preclude the Department from requiring further information over and above that set out above.

Yours faithfully



Philip Stinson
Principal Planning Officer
Strategic Planning Division

NIEA: Historic Monuments Unit
Waterman House
5-33 Hill Street
Belfast
BT1 2LA

Planning Service Ref: M/2013/0509/DETEIA
NIEA: HMU ref: SM11/1 TYR 54, 55, 61, 62 & ARM 11, 15, 19
Site: Lands between the proposed new NIE substation at the rear of 152 Trewmount Road, Moy, Co. Tyrone in the townland of Turleenan to the townlands of Dooat or Crossreagh and Crossbane, Co. Armagh on the border with ROI
Date: 27/11/13

NIEA Historic Monuments Unit can only comment on the aspects of this proposal that affect recorded and previously unrecorded archaeological remains within Northern Ireland, we note that there may be some transboundary effects of this proposal on the historic environment of Northern Ireland

Consequently, NIEA Historic Monuments Unit expect that any Environmental Statement which accompanies this application should include an archaeological section, or if an ES is not required, we would request an archaeological assessment of the potential impacts of this proposal on the known archaeology and the potential for (and mitigation of) previously unrecorded below ground archaeological remains, as per **Policy BH 3 of PPS 6**.

We have noted "Section 6.2.4.9 Cultural Heritage" within the "Preferred Project Solution Report" and advise that this would form a sound basis for a cultural section within an ES or an archaeological impact assessment. This should include a comprehensive desk based assessment, field inspection, identification of potential physical and visual impacts upon the historic environment of Northern Ireland and recommendations for archaeological mitigation ahead of development.

Issued on behalf of
NIEA: Historic Monuments Unit



Northern Ireland Environment Agency
Natural Heritage
Landscape Architects
Klondyke Building
Cromac Avenue
Malone Lower
BELFAST
BT7 2JA

Western Area Planning Office
Local Planning Division
Department Of Environment
County Hall
Drumragh avenue
Lisnamallard
Omagh
BT79 7AF

Date: 2 December 2013
Telephone: 028 905 69613
Email: LandscapeArchitects@doeni.gov
Your Ref: M/2013/0509/DE/IEIA
Our Ref:

The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2012 (The "EIA Regulations")

Description of Proposal: North – South Interconnector

Location: Trewmount Road, Moy to Townland of Crossbane in Co Armagh

Eir Grid scoping request in relation to project

NIEA Landscape Architects does not hold any specific information on the site.

In considering the landscape and visual impact of the proposed development, the latest available guidance on Landscape and Visual Impact Assessment methodology should be employed. NIEA Landscape Architects would recommend the methodology advocated by "Guidelines for Landscape and Visual Impact Assessment": 3rd Edition, published April 2013, by the Landscape Institute and Institute of Environmental Management and Assessment.

The Landscape Institute Advice Note 1/11: "Photography and Photomontage in Landscape and Visual Impact Assessment" should also be considered.

I trust the above is of assistance and if you have queries please do not hesitate to contact me.

Issued on behalf of
Mr EJM Miller
Principal Landscape Architect

Ryan Nolan
Department of the Environment
Strategic Planning Division
Millenium House
2nd Floor
17-25 Great Victoria Street
Malone Lower
Belfast
BT2 7BN.

27 November 2013

Your Ref:
M/2013/0509/DETEIA
Our Ref: WMU/PC/ 21566-1

Dear Mr Nolan

Type: PS - EIA Deter.

RE: Eir Grid scoping request in relation to North-South interconnector project.

Location: Lands between the proposed new NIE substation at the rear of 152 Trewmount Road, Moy, Co Tyrone in the townland of Turleenan to the townlands of Doohat or Crossreagh and Crossbane, Co Armagh, on the border with the Republic of Ireland.

The Northern Ireland Environment Agency Water Management Unit (NIEA WMU) acknowledges receipt of a consultation dated 15 November 2013 regarding the above development.

NIEA WMU has no comments to make on the potential transboundary impact of this proposal.

Issued on behalf of
Water Management Unit
Northern Ireland Environment Agency



North-South Interconnector Project

2023-2024
2023-2024

2023-2024

Dear Sir/Madam,

RE: Grid Scoping request re North-South Interconnector Project

Thank you for your contribution regarding the latest stage of the NSI project.

This has been received and will be reviewed accordingly.

Yours faithfully,

Brian Duncan
Planning Advisory Unit





Kieran Doherty
Executive Officer
An Bord Pleanála
64 Marlborough St
Dublin 1



Regional Inspectorate in scarra
County Cork, Ireland
Cigireacht Réigiúnach Inis Cara
Contae Chiarraí Eise
T: +353 21 487 5540
F: +353 21 487 5545
E: info@epa.ie
W: www.epa.ie
LoCall 1890 33 55 99

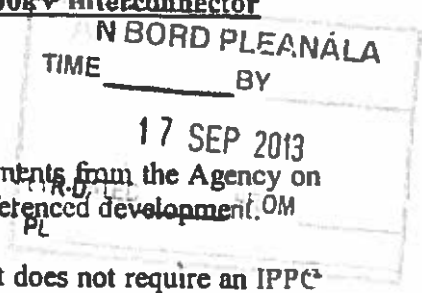
13 September 2013

Your Ref: 02.VS0002

EIS Scoping Request in relation to Eirgrid North-South 400kV Interconnector

Dear Mr. Doherty

I refer to your letter received 4th September 2013 requesting comments from the Agency on the information that should be included in the EIS for the above referenced development.



It is noted that based on the information provided the development does not require an IPPC licence from the Agency.

In relation to the matters which should be included in the EIS, regard should be had to the guidance given for Project Type 20 in the EPA's document *Advice Notes on Current Practice in the preparation of Environmental Impact Statements*, which is available at the following link: <http://www.epa.ie/downloads/advice/ea/guidelines/>

Yours sincerely,

Pamela McDonnell

Pamela McDonnell
Office of Climate, Licensing & Resource Use



16 DEC 2013

Comhairle Chontae na Mí
Halla an Chontae, An Uaimh, Contae na Mí
Fón: 046 – 9097000/Fax:046 – 9097001
R-phost: info@meathcoco.ie
Web: www.meath.ie



Meath County Council
County Hall, Navan, Co. Meath
Tel: 046 – 9097000/Fax: 046 – 9097001
E-mail: info@meathcoco.ie
Web: www.meath.ie

AN BORD PLEANÁLA
TIME _____ BY _____
01 OCT 2013
LTR-DATED _____ FROM _____
PL _____

PLANNING SECTION
30th September, 2013

Your Ref: 02.VS0002

An Bord Pleanála
64 Marlborough Street
Dublin 1

Re: North – South 400k V Interconnector

Dear Mr Doherty,

Please find set out below as brief synopsis of a recent meeting between Meath County Council and Eirgrid together with a number of issues which the Council would like to see addressed within the Environmental Impact Statement.

Eirgrid and their consultants met with officials from Meath County Council on Tuesday 3rd September 2013 and they gave an overview of the project.

An Bord Pleanála are now affording the Planning Authority under Section 182E(3) of the Planning & Development Act 2000 as amended an opportunity to make a submission in relation to matters that they consider should be contained within the Environmental Impact Statement (EIS) that will be submitted by Eirgrid as part of the imminent Strategic Infrastructure planning application.

A document outlining the proposed route has been submitted (including maps) and issues that were raised as part of the previous application area addressed.

In terms of baseline assessment for the EIS, the applicants were asked if they gained access to the necessary lands in order to carry out the baseline assessments. Details of baseline surveys should be included in terms of where they were conducted and at what time of year they were conducted?

Eirgrid have highlighted a number of minor modifications to the route (at Brittas, Nobber and Dunderry Park) that are proposed.

Meath Local Authorities are of the opinion that the following matters should be addressed in detail as part of the EIS to be submitted.

Consideration of alternatives-in terms of route location and in terms of undergrounding or over grounding or the possibility of undergrounding at certain locations where the landscape is particularly sensitive.

The benefit to the local and national economy, who will benefit from this development proposal, will the proposals result in additional power being made available to the National grid, or will it be exported, will it be similar to the east-west interconnector where there are possibilities to both import and export power?

Landscape, the Meath landscape is rich in character in terms of archaeology, protected structures and many sensitivities exist, how much capacity is available within the various landscape areas as identified with the landscape character assessment as contained within the Meath county Development Plan 2013-2019? The height of the towers may have a significant impact at particularly sensitive locations, would it be prudent to examine if undergrounding a section (s) at these sensitive locations is possible?

How will the visual impacts be assessed, have the applicants access to lands to carry out such assessments?

Interactions with landowners and affected third party's. This proposal will impact upon a significant element of the population of Meath, how have Eirgrid engaged with the affected persons? When and if the proposal is to be permitted, how will Eirgrid liaise with the locals, what impact will there be on locals?

A code of practice and construction management strategy should be devised whereby timescales for the project should be clearly set down and how it is envisaged the lines traversing from Woodland at Batterstown to Kingscourt would be erected, by what means will the towers be brought to the sites, similarly for the cables, will roads be closed off, how will this impact upon local residents, will there be detours? How will this impact upon farming in terms of the harvest seasons(s) when silage, hay, corn, wheat, vegetables are to be harvested? Is there a traffic management strategy in such situations?

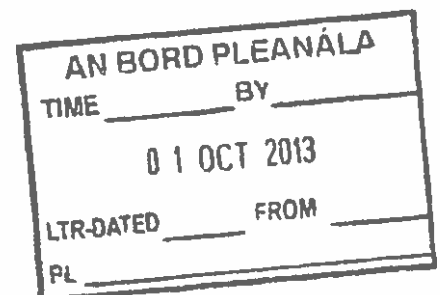
It is noted that the sub-station previously proposed in north Meath (adjacent to Kingscourt) is now not proposed as part of this proposals. However Eirgrid indicated that it may be necessary to construct this facility at a later date. Would it not be better to include it as part of the development proposal at this stage so that a full and proper assessment of the merits of same can be assessed?

In the event that there is a fault/failure in the system when constructed, again will this inconvenience local residents, can it be managed remotely?

The Planning Authority respectfully request that An Bord Pleanála seek to have the matters as highlighted above included within the Environmental Impact Statement in a comprehensive manner in order to assist

Yours faithfully,


M. Griffith
Senior Executive Officer



Kieran Doherty

From: Siobhan Mulligan <sdonohoe@cavancoco.ie>
Sent: 11 October 2013 10:01
To: Kieran Doherty
Subject: Scoping for EIS for North South Interconnector

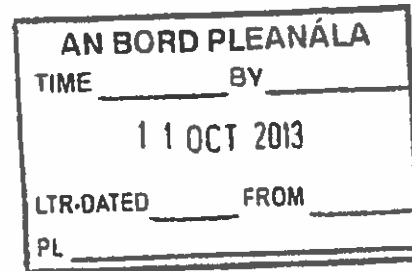


Kieran

Please find enclosed submission as discussed.

Please let me know you receive ok

Regards
Siobhan Mulligan
Planning Section
049-4378625
sdonohoe@cavancoco.ie



From: Kieran Doherty [<mailto:K.Doherty@pleanala.ie>]
Sent: 03 October 2013 14:29
To: Siobhan Mulligan
Subject: FW: Scoping for EIS for North South Interconnector

Hello Siobhan,

An Bord Pleanála has received the attached submission from Cavan County Council. Please note that the last date for submissions was 1st October 2013. As the e-mail from Cavan was received on 2nd October 2013 it cannot be considered by the Board.

However, the Board is of the opinion that Cavan's comments should be invited in regard to the scoping request. Therefore, in accordance with section 182E(3) of the Planning and Development Act, 2000, as amended you are invited to make your submission within 4 weeks of this notice.

Thank you for your assistance.
Best regards,
Kieran Doherty
An Bord Pleanála
01 873-7248

From: Marice Galligan [<mailto:mgalligan@cavancoco.ie>]
Sent: 02 October 2013 11:23
To: Kieran Doherty
Cc: Eve Harrison
Subject: Scoping for EIS for North South Interconnector

Kieran

As discussed
Marice Galligan
A/Senior Planner
Cavan County Council

Scoping for EIS for North South Interconnector

1. Cavan County Council have examined the Solution Report July 2013 in relation to the proposed development and in addition to the issues outlined in Chapter 6 of this document for inclusion in the EIA, Cavan County Council considers that Eirgrid include impacts of the proposed development on all local designations which can be sourced in the current Cavan County Development Plan 2008-2014 and also the draft Cavan County Development Plan 2014-2020 which is currently on public display. Particular emphasis should be placed on the noted shortcomings of the previous EIA, which were noted by the Planning Authority and include
 - Visual assessment in relation to Lough an Lea
 - Panoramic photomontages of existing and proposed lines and pylons in vicinity of Lough an Lea including views to and from.
 - Justification for not undergrounding in the vicinity of Lough of Lea.
 - Impact and visual impact report on Muff Crossroads which is location of annual Muff Fair.
 - Environmental carrying capacity of site in Co. Cavan.

2. The Planning Authority considers that precise construction details should be included of towers.

3. In relation to access to each site for tower construction, Cavan County Council recommends the inclusion of accesses-temporary and permanent, types of vehicles used for delivery and construction, trip generation and trip routes and type of loads.

AN BORD PLEANÁLA	
TIME _____	BY _____
11 OCT 2013	
LTR-DATED _____	FROM _____
PL _____	



Comhairle Contae Mhuineacháin Monaghan County Council

Acmhainní Daonna
Human Resources
047 30588

Airgeadas
Finance
047 30588

Na Bóithre
Roads
047 30597

Clár na dToghthóirí
Register of Electors
047 30547

Comhshaol
Environment
047 30593

Deontais Ardoideachais
Higher Education Grants
047 30550

Na hEalaíona
Arts
047 71114

asachtaí /Deontais Tithíochta
Housing Loans/Grants
047 30527

Leabharlann an Chontae
County Library
047 74700

Mótarcháin
Motor Tax
047 81175

Múseam an Chontae
County Museum
047 82928

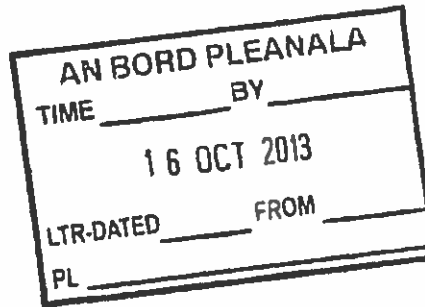
Pleanáil
Planning
047 30532

Pobal & Fiontar
Community & Enterprise
047 73719

Rialú Dóiteáin/Foirgniamh
Fire/Building Control
047 30521

Seirbhís Uisce
Water Services
047 30504

Kieran Doherty
An Bord Pleanála
64 Marlborough Street.
Dublin 1



14th October 2013

A Chara,

RE: EIS Scoping Request in Respect of North South 400kV Interconnector

I refer to your correspondence seeking observations in respect of the above and apologise for the delay in responding.

At this stage Monaghan County Council has nothing to add to the elements identified in the section "Matters to be Addressed in the EIS" as set out in Chapter 6 of Preferred Project Solution Report (July 2013).

I would be grateful if Monaghan County Council could be furnished with a copy of the written opinion of An Bord on this matter.

Is mise le meas,

Paul Clifford

Director of Services for Planning and Economic Development

Fáilteann an tUdarás Áitiúil roimh chomhfhreagras I nGaeilge.

Comhairle Contae Mhuineacháin, Oifigí an Chontae, An Gleann, Múineachán, Éire

Monaghan County Council, Council Offices, The Glen, Monaghan, Ireland

☎ 00353 47 30500 📠 00353 47 82739 🌐 www.monaghan.ie

✉ ccliff@monaghancc.ie info@monaghancc.ie





Mr. Kieran Doherty
Executive Officer
An Bord Pleanála
64 Marlborough Street
Dublin 1

Teach Naomh Máirtín / Bóthar Waterloo / Baile Átha Cliath 4
St. Martin's House / Waterloo Road / Dublin 4
Tel: / Tel: + 353 1 660 2511 Facs: / Fax: + 353 1 668 0009

Dáta | Date
13 September, 2013

Ár dTag. | Our Ref
NRA13-88570

Ehúd dTag. | Your Ref.

**Re.: North South 400kV Interconnector
Environmental Impact Statement Scoping (case reference PI 02.VS0002)**

Dear Mr. Doherty,

The Authority wishes to acknowledge receipt of notification relating to Environmental Impact Statement Scoping in relation to the above project.

The Authority has also previously corresponded directly with Eirgrid on this matter.

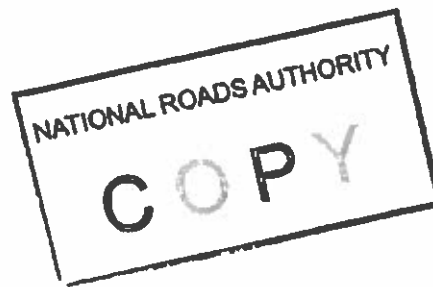
In the interests of consistency and clarity, please find attached a copy of the Authority's previous submissions to Eirgrid on this project and the Authority's correspondence on the earlier application.

In addition, please also find attached copies of the Authority's previous EIS Scoping submissions on the Cavan – Meath 400kV Project and the Cavan – Tyrone 400kV Project (July, 2009).

It is hoped that the foregoing and attached are of assistance to the Board in EIS Scoping.

Yours sincerely,

Michael McCormack
Policy Advisor (Planning)



Mr. Aidan Geoghegan
Eirgrid
The Oval
160 Shelbourne Road
Ballsbridge
Dublin 4

22 August, 2013

NRA13-88231

**Re.: North South Inter-connector
Strategic Infrastructure Application – public consultation**

Dear Mr. Geoghegan,

Thank you for your letter of 15 July advising of the next phase of public consultation that you are undertaking in relation to the above project.

I can confirm that the Authority's position as set out in our submission of 1 May, 2013, remains (NRA13-87532 refers). I acknowledge that Eirgrid's recent publication *Preferred Project Solution Report* responds to the contents of the Authority's earlier submission.

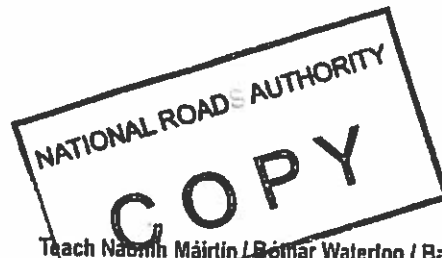
I also note the commitment to continue consultation with the Authority (and the M3 Concession Company) during the process of finalising the line design and preparation of the EIS which is outlined in the *Preferred Project Solution Report*.

The Authority anticipates further consultation on the interface of national roads and national road projects and the North - South 400kV Interconnector with Eirgrid as the project progresses.

The Authority trusts that the foregoing comments prove of assistance to you in further developing the project.

Yours sincerely,

Michael McCormack
Policy Advisor (Planning)



Mr. Aidan Geoghegan
Eirgrid
The Oval
160 Shelbourne Road
Ballsbridge
Dublin 4

Dáta | Date
1 May, 2013

Ár dTag. | Our Ref.
NRA13-87532

Bhur dTag | Your Ref

Re.: **North South Inter-connector
Strategic Infrastructure Application – public consultation**

Dear Mr. Geoghegan,

Thank you for your letter of 15 April in relation to the above project. The following outlines the Authority's observations on the initial phase of consultation for the proposed North South 400kV Interconnection Project:

The Authority considers that many of the issues which were outlined in NRA observations in relation to the previous Meath – Tyrone 400kV Interconnection Project remain applicable to the current Scheme; copy attached.

While Eirgrid will note that the former N3 has been re-classified to the R-147 since the last inter-connector project, the indicative line route for the inter-connection still traverses the N2, national primary road, and the N51 and N52, national secondary roads, in addition to the M3 which was under construction at the time of the consideration of the previous project.

In addition, the proposed 400kV Indicative Line Route (April, 2013) traverses the line of the Leinster Orbital Route (LOR), formerly known as the Outer Orbital Route, between Navan and Trim. The LOR remains a project at Feasibility Stage, however, the proposal to develop the LOR is included in the Meath County Development Plan, the Greater Dublin Area Regional Planning Guidelines, 2010 – 2022, and the NTA's Greater Dublin Area Draft Transport Strategy, 2011 – 2030.

While it is acknowledged that Eirgrid examined the inter-relationship of the proposed 400kV Interconnector and the LOR during the course of the assessment of the previous scheme, the Authority recommends that Eirgrid re-examines the inter-relationship of the two infrastructure projects to take into account any alterations or modifications to the revised North South Inter-Connector that may have implications for the LOR.

Having regard to the foregoing, the Authority requests that Eirgrid gives consideration to the following matters in the development of the project:

- 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,
- ensure that proposed works do not impinge on the M3 motorway and the Concession Operator, the Authority recommends that the NRA, the relevant planning authority and the M3 Concession Company are consulted during the development of the project concerning works proposed to be undertaken in proximity to the M3,

- ensure that the detailed scheme design provides sufficient clearance to facilitate the construction of the future Leinster Orbital Road.

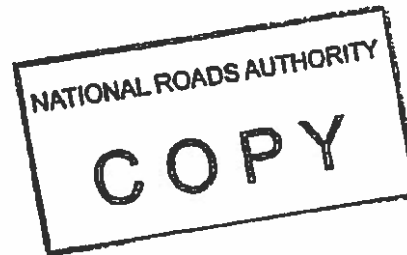
The Authority trusts that the foregoing comments prove of assistance to you in further developing the subject scheme.

Yours sincerely,



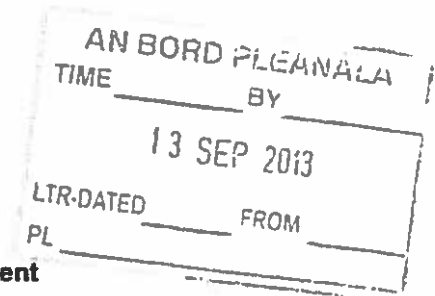
Michael McCormack
Policy Advisor (Planning)

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1



12 March, 2010

NRA09-76658



Re.: Meath – Tyrone 400kV Interconnection Development
Strategic Infrastructure Application

Dear Secretary,

The Authority has received referral of the above proposal and submits the following observations for the Boards consideration;

The Authority notes that the proposed route of the Meath – Tyrone 400kV line (Woodland to Moyhill Section) traverses the existing N51, south west of Navan, the N3, north west of Navan and the N52, north east of Kells.

The proposed route also traverses the M3 Motorway Scheme, currently under construction, north west of Navan.

In addition, the proposed 400kV route corridor traverses the line of the Leinster Orbital Route (LOR), formerly known as the Outer Orbital Route, between Navan and Trim as identified in the Leinster Orbital Route Feasibility Study Final Report issued by the Authority in March, 2009. The Feasibility Study Final Report is available on the NRA's website at www.nra.ie, please also find a copy attached.

The proposal to develop an Outer Orbital Route is included not only in the Meath County Development Plan but also in the National Development Plan and as a key objective of the *Regional Planning Guidelines for the Greater Dublin Area*.

It is noted that although the Authority brought the LOR to the attention of the project promoters through pre-consultation EIS scoping, the EIS submitted in support of the application does not appear to make reference to the LOR or how the interface between the proposed power line development and the LOR will be addressed.

The Moyhill to Border Section of the Meath – Tyrone 400kV line traverses the existing N2, north of Castleblayney. This section is also in proximity to, but outside, the constraints study area of the N2 Clontibret to Border Scheme.

Having regard to the foregoing, the Authority requests that the Board consider the following;

- While it is noted that the EIS submitted in support of the application does not appear to identify in detail the methods/techniques employed in traversing the existing national road network, the Authority requests that the safety and standards of the national road network is maintained through appropriate best practice construction methods.
- The Authority is concerned to ensure that the proposed works do not impinge on the M3 motorway and the Concession Operator; the Authority requests that the NRA, the relevant planning authority and the M3 Concession Company are consulted and their agreement sought in advance of works being undertaken in proximity to the M3, currently under construction.
- That the detailed scheme design provides sufficient clearance to facilitate the construction of the future Leinster Orbital Road. The Authority requests that the Board include a condition requiring the developer/scheme promoter to consult with the NRA and agree detailed design specifications for the proposed 400kV line in relation to the LOR in advance of any works in the vicinity of the LOR as identified in the Feasibility Study.

To further elaborate on the relationship of the LOR Scheme with the proposed 400kV power line, the Authority outlines the following points;

From an examination of the information referred, the Authority advises that the proposed 400kV power line route traverses the LOR route corridor as identified in the Leinster Orbital Route Feasibility Study Final Report.

The Authority has particular concerns in relation to the route of the LOR in the vicinity of Trim.

LOR Route Corridor East of Trim

a) The area of potential interface between the LOR and the proposed 400kV power line that would be of greatest concern to the Authority is in the vicinity of pylons no. 47 to 50 near the northern bank of the River Boyne at the townland of Balbrigh.

b) The LOR will cross the R161 Navan to Trim road in this vicinity if it is to pass east of Trim. Given the proximity of the R161 to the River Boyne at this location, it is possible that the LOR would pass over the R161 rather than underneath it so as to connect to a river bridge with suitable clearance for flood levels and river bank access tracks.

It is therefore possible that the LOR will be on an embankment across the generally level terrain in this vicinity so as to cater for the road and river crossings in the Boyne Valley.

The Authority requests that the proposed power cables, at this location, provide suitable vertical clearance to the LOR road which may be at a level of 7.5m above the general ground level.

c) In addition, the aerial photography shows two features that appear to be ring forts or other archaeological remains: one just east of Pylon No. 48 and one just west of Pylon No. 50. These features would constrain the LOR detailed route options

severely. There may be further archaeology in this area that is not visible on the surface, as is typical along a river valley where historic settlements would have concentrated.

As a detailed constraints study has yet to be developed for the LOR, it is the Authority's opinion that it would be preferable to avoid placing pylons in the strategic locations between such obvious features; for example, the location of Pylon No. 49 should be omitted as it would conflict with the LOR in seeking to avoid the visible archaeological features.

The pylons are shown at typical 370m spacings. The footprint of the LOR on embankment will be about 50m to 60m wide. Obviously it will be challenging to thread a 50m wide route corridor through a 370m wide gap while conforming with alignment design standards and avoiding other constraints on the approaches. The Authority has a concern about Pylon no. 49 being in the middle of the best gap through other constraints. The Authority respectfully requests that the pylon be moved at least 50m so as to afford reasonable space for a possible route for the LOR.

LOR Route Corridor West of Trim

a) If the LOR were to follow a route to pass west of Trim, it would cross the interconnector further north, in an area to the northwest of Robinstown, in the vicinity of Pylons No. 52 to 56. Ideally the LOR would seek to cross local roads at ground level with overbridges for the local roads. However, it appears that there is a lot of housing in this area along a local road at Cloncullen immediately west of the Eirgrid route. It may be difficult to lift this local road over the LOR because of the frontage development and accesses.

The Authority advises that it would be prudent, therefore, to provide for the LOR being on embankment in this area and to ensure that the power cables accordingly allow for a LOR being on a 7.5m embankment.

b) There are relatively few gaps in the existing housing along the Cloncullen Road which is visible on the Eirgrid map just west of the pylons. Unfortunately Pylons No.54 and 55 are located such they are aligned with the most obvious gaps through which the LOR might seek to pass. The Authority respectfully requests that these two pylons be moved 50m southward so as not to block the gaps for the LOR.

Conclusion

The Authority reiterates that the proposal to develop a (Leinster) Outer Orbital Route is included in the National Development Plan, as a key objective of the *Regional Planning Guidelines for the Greater Dublin Area* and within the Meath County Development Plan.

Having regard to the foregoing, the Authority respectfully requests that the Board gives consideration to the particular requirements of the LOR in relation to the areas where the proposed 400kV line and the LOR have an interface. Furthermore, the Authority requests that the Board include a specific condition requiring the developer/scheme promoter to consult with the NRA and agree detailed design specifications for the proposed 400kV line in relation to the LOR in advance of any works in the vicinity of the LOR taking place.

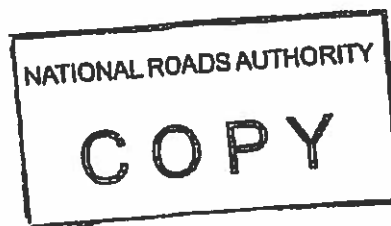
The Authority trusts that the foregoing comments prove of assistance to the Board in dealing with the matter.

Yours sincerely,

Tara Spain,
Senior Policy Adviser (Planning)

Cc Tomás Mahony, Project Manager, Eirgrid

Sinead McInerney
Executive Officer
An Bord Pleanála
64 Marlborough Street
Dublin 1



26 May, 2010

NRA10-78487

**Re.: Meath – Tyrone 400kV Interconnection Development
Strategic Infrastructure Application**

Dear Ms McInerney,

Further to the Authority's submission to An Bord Pleanála of 12th March, 2010, in relation to the above scheme and subsequent to notification received from the Board of 04th May, 2010, in relation to details concerning the commencement of an oral hearing into the proposed development, the Authority wishes to advise as follows:

Subsequent to the Authority's submission to An Bord Pleanála of 12th March, 2010, the Authority received correspondence from Tobin Consulting Engineers Ltd acting on behalf of Eirgrid, the scheme promoter, correspondence dated 15th April and 07th May, 2010 refers.

Further to an assessment of the information referred by Tobin Consulting Engineers on behalf of Eirgrid, the Authority wishes to advise, for the benefit of the Board, that the Authority is satisfied that issues raised in the Authority's submission to the Board of 12th March, 2010, in relation to potential impacts to the proposed LOR (Leinster Orbital Route), have been satisfactorily addressed by proposed mitigation.

In the context of the foregoing, the Authority has no objection to the proposed scheme.

The Authority trusts that the foregoing comments prove of assistance to the Board in dealing with the matter.

Yours sincerely,

Michael McCormack
Policy Advisor (Planning)

cc Tomás Mahony, Eirgrid
cc John K Colleran, Tobin Consulting Engineers



Consulting Engineers

www.tobin.ie

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Fax: +353 (0)91 565268

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Black Eagle Building,
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Fax: +353 (0)42 9231715

Our Ref: JKC/SG 5984-02-06

07th May 2010

Ms. Tara Spain,
National Roads Authority
St. Martin's House
Waterloo Road
Dublin 4

NATIONAL ROADS
AUTHORITY
10 MAY 2010
RECEIVED

RE: Meath – Tyrone 400kV Interconnector Development
Strategic Infrastructure Application

Dear Ms Spain,

I refer to your letter of March 12th concerning the above matter. ~~TOBIN is dealing with Traffic and Roads matters relating to the above project on behalf of Eirgrid and I am authorised to correspond with you in relation to the matters raised by you in your letter.~~

In order to advance discussion in relation to the items raised, I contacted Nigel O'Neill some time ago and was directed to discuss the potential interaction of the Interconnector project with the proposed LOR with Mr Seamus Mac Gearailt of Roughan O'Donovan, who had dealt with the route corridor constraints / selection for the LOR project in 2007

The results of this consultation are contained in the attached correspondence and in mapping, which have been forwarded to Mr. O'Neill for his consideration

I trust that these will be found to be satisfactory and will enable you to issue a letter of no objection to the proposal either to ourselves or to the An Bord Pleanála as you may see fit

Please contact me at any time should you require further clarification on the enclosed documentation

Yours sincerely,

John K Colleran
Director

087 9291518

Directors: D.A. Downes (Chairman) L.E. Waldron (Managing Director) M.F. Garrick R.F. Tobin J. Colleran B.J. Downes S. Finlay P.J. Fogarty D. Grehan J.P. Kelly B.M. Mulligan B. Murray C. O'Keeffe F. Rankema E. Connaughton (Company Secretary)

Associates: T. Cannon P. Cloonan D. Conneran M. Corroy T. Curran O. Downes B. Gaffney B. Gallagher B. Heaney **ENGINEERS**

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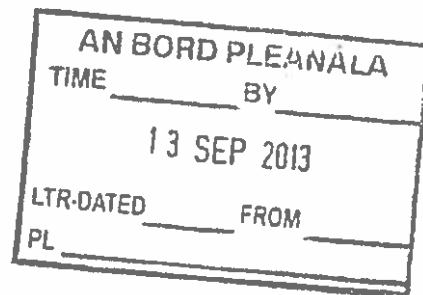
Market Square,
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Our Ref: JKC/SG 5984-02-06

15th April 2010

Mr. Nigel O'Neill
Senior Inspector
National Roads Authority
St. Martin's House
Waterloo Road
Dublin 4



**RE: Meath – Tyrone 400kV Interconnector Development
Strategic Infrastructure Application**

Dear Mr. O'Neill,

I refer to NRA letter dated 12th March, addressed to The Secretary, An Bord Pleanála in relation to the above matter.

As TOBIN Consulting Engineers are acting for the proposers of the Scheme, Eirgrid in relation to the Roads and Traffic related impacts of the project, I am authorized to correspond with you in relation to the items raised in your letter as follows:-

1. In as much as the proposed line will traverse a number of existing National Routes including the existing N2, N3, N51 and 52, it is envisaged that the traffic associated with the carriage of construction materials, equipment and construction operatives to the dispersed work locations in the environs of these roadways will have a negligible and transient impact on the structure, capacity and safety of these roads. It is submitted that this can be regarded as insignificant

The stringing of conductor across these roads will be carried out in accordance with IEEE Std 524-1992 "Guide to the Installation of Overhead Transmission Line Conductors" incorporating a tried and proven work methodology which again ensures that there is no significant impact on the safe passage of traffic on these roads.

Accordingly we would hold that no significant adverse impact to the existing National Route Network will be caused by the project construction or for that matter by its subsequent operation.

- 2 The position in relation to the proposed N2 Clonlibret to Border Scheme is noted in that the proposed Interconnector line does not conflict with the Constraints Study Area.
3. Positive consultations have taken place with a representative of the M3 Concession Company in relation to the proposed intersection point of the Interconnector line and the M3, and we are satisfied that no potential negative impact exists

We have issued a letter (copy attached) to the Concession Company setting out in detail the satisfactory clearance that will obtain between the finished surface of the M3 and the overhead conductor catenary at the crossing point, and it is agreed that the Concession Company will issue a letter of "no objection to us in return" A copy of this letter will also be forwarded to you for your information and attention.

- 4 Consultations have also taken place with Mr. Seamus Mac Gearailt of Roughan O'Donovan, Consulting Engineers, in relation to possible interactions between the line proposed for the Interconnector and the proposed Leinster Orbital Route corridor resulting in the following agreed positions:

- (a) The interconnector segment containing pylons 52 to 57 (see attached Figure 1 LOR) intersects the proposed L.O.R. Corridor at a point North East of Trim At this point there exist a discrete number of route options within the overall corridor width, which avoid the farmyards and dwellings that are dotted along the local road known as the Cloncullen Road (running from Cloncullen to Duntlough). A concern had arisen that the proposed locations for the pylons ranged across the L.O.R. corridor at this point might serve to "close off" some of the gaps existing between the properties through which the final L.O.R. line might pass.

A more detailed examination of the situation conducted jointly with Mr Mac Gearailt revealed however that given the predominantly South West / North East alignment of the L.O.R. Corridor at this point, the proposed pylon locations were optimally sited "in the shadow" of the existing dwellings and farms. It was agreed that further comfort for the L.O.R. project could be afforded by local movement within the 40m lateral "micrositing" corridor of flexibility in the event that a more precise evaluation of the L.O.R. route location at this point (if completed in advance of the construction of the Interconnector) might indicate its desirability

The vertical clearances at mid-span between the proposed catenary and the existing ground levels at this point, as shown on the attached Woodland - Moyhill 400kV Transmission Line Planning Drawings MT-005-006 and MT-005-007 are all comfortably in excess of the recommended minimum of 9 metres (refer to IEEE Std 524-1992 "Guide to the Installation of Overhead Transmission

Figure 1 is an extract of the relevant area taken from Woodland - Moyhill 400kV Transmission Line Planning Drawings No. MT-003-003 and MT-003-004 with the M3 Route overlaid Aerial photography was also overlaid for better orientation

Line Conductors"). The ground level is shown by a solid line on these long sections, and the 9m clearance height is shown by a dotted line.

- (b) The second point of intersection is East by North East of Trim where the Interconnector segment containing pylons 44 to 50 traverses a variant of the L.O.R. at a high angle of skew.

The attached Woodland - Moyhill 400kV Transmission Line Planning Drawings No. MT-005-006 and MT-005-007 set out the proposed catenary levels with regard to existing ground levels along the segment in question and it is noted that the minimum mid-point clearances over existing ground level along spans 48/49 and 49/50 are of the order of 15 to 17metres. This is sufficient to allow for the minimum required clearance of (9m) between catenary mid-points and the proposed L.O.R. allowing for this to be raised on a 5metre embankment at this point for the purpose of crossing the River Boyne and passing over the R161. The clearance over existing road and ground level at the midpoint of span 47/48 is of the order of 12metres. It is suggested that this section be kept under review pending any further developments in relation to the LOR route in advance of the Eirgrid project going to contract.

We would not anticipate any difficulty in informing the Board that we needed to raise pylons 47 and 48 by 2m in order to provide the necessary clearance, should this prove to be necessary.

Furthermore it was agreed that an increased level of comfort could be provided for the future L.O.R. by local movement of pylon No. 49 within the 40m lateral "microsiling" corridor of flexibility such that the potential difficulties associated with threading the L.C.R. between the two identified ring forts would not be exacerbated as a result of the presence of the pylons

On behalf of Eirgrid, I would request that you examine the content of this submission and if satisfied, that you would indicate by letter your satisfaction with the measures proposed by way of mitigation in relation to existing and proposed NRA assets.

If required, the substance of this letter can be forwarded officially by Eirgrid to An Bord Pleanála and copied to you such that your satisfaction with the proposed arrangements can be formally confirmed to An Bord Pleanála.

Yours sincerely,



John K. Colleran
Director

PP

FILE	30
13.5.2008	
LTR-DATED	FRD:
PL	



TOBIN
Patrick J. Tobin & Co. Ltd.

Consulting Engineers

1.2.2010

Enghave Road,
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Our Ref: 5984-02-08 JKC/SG

5th May 2010

Mr. Ende Tyrrell
M3 Concession Company
Site Offices
Dunshaughlin
Co Meath

**RE: Meath – Tyrone 400kV Interconnection Development
Strategic Infrastructure Application**


Dear Ende,

I refer to our meeting on Thursday 8th of April in relation to the above project. I now attach herewith Figure 1¹ which sets out the proposed location for pylons to be constructed in the vicinity of the M3 route at Ardbraccan / Grange

In addition I attach an extract from the long section of the proposed line with reference to the finished level of the M3 at this point, as shown on the attached Woodland – Moyhill 400kV Transmission Line Planning Drawing No. MT-005-009. You will see that there is adequate lateral separation between the proposed pylon locations and the project road (the fence lines of the motorway are just visible on the aerial photography between pylons 80 and 81). The vertical clearance between the road surface level of 62.5 AOD and the conductor catenary at mid-point between pylons 80 and 81 is of the order of 12 metres. This is comfortably in excess of the 9m required in accordance with IEEE Std. 524-1992 "Guide to the Installation of Overhead Transmission Line Conductors". This clearance level is shown as a dotted line on the long section, while the ground profile is shown as a solid line

I would be much obliged if you could confirm to me as agent of Eirgrid, that your company has no objection to the above named project as proposed in the vicinity of its crossing of the M3.

Yours sincerely,

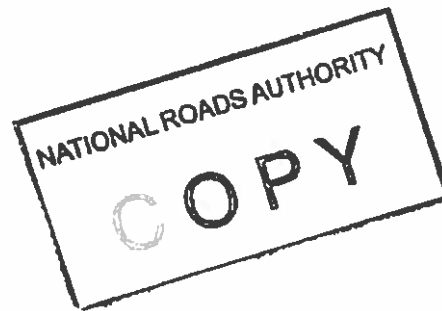

John K. Collieran
Director

¹ Figure 1 is an extract of the relevant area taken from Woodland – Moyhill 400kV Transmission Line Planning Drawing No. MT-003-005 with the M3 Route overlaid. Aerial photography was also overlaid for better orientation

Directors: L E Waldron (Chairman), R F Tobin (Managing Director), M F O'Riordan, J. Collieran, B J Downes, S Flaherty, P J Fogarty, D Gahan, J P Kelly, D M Milligan, C O'Riordan, E Connaughton (Company Secretary), D A Downes (Consultant)

Associates: T Cannon, P Cloonan, D Conneran, T Lutton, B. Gallagher, D. Heaney, B Hutchinson, D Kennedy, M McDermott, C McGovern

**Mr. Jarlath Doyle
Project Manager
Cavan - Tyrone 400kV Project
ESB International
Stephen Court
18/21 St. Stephen's Green
Dublin 2**



27th July 2009

NRA 09-73541

Re: EIS Scoping Request for the Development of the Cavan – Tyrone 400kV Project

Dear Mr. Doyle,

I wish to acknowledge receipt of your letter of 06th July regarding the above.

You may be aware that the Authority, in conjunction with local authorities, is undertaking a programme of major improvements to the network of national roads in line with policy set out by Government in Transport 21 (2006-2015) and the National Development Plan, 2007-2013. National roads fulfil a vital function in catering for the movement of people, freight and other goods throughout the country. The Authority's improvement programme involves substantial investment to address deficiencies in the network, improve the safety of road users and achieve a better level of service for users of the network through shorter journey times and greater predictability of journey time duration. The Authority has special interest in seeking to ensure that development will not prevent or compromise plans for new/existing national roads, including indicative, e.g. provision made in planning authority development plans, or approved routes for such roads, nor interfere with the future upgrade of existing national roads.

With regard to the above, it is noted that the preferred 400kV route corridor crosses the N2, national primary route, to the north west of Castleblayney. Also, the Authority advises that a constraints study area has been identified for the N2 Clontibert to Northern Ireland Border Scheme.

The EIS should consider impact and relationship of the proposed development with the existing and proposed national road network in the area with a view to safeguarding the public investment in the national road network and protecting the safety and capacity of existing national roads.

In regards to general scoping issues, your attention is directed to the Authority's *Policy Statement on Development Management and Access to National Roads* which provides comprehensive information for developers and decision makers on the principles guiding the NRA's approach towards proposed developments impacting upon national roads. The principles concerned, as well as the general content of the policy statement, will be informative for those engaged on the scoping of Environmental Impact Statements (EISs) and it is recommended that the document should be consulted. The statement highlights the key policies and issues concerning national roads such as the protection of the substantial investment being made in upgrading the network, maintaining efficiency/satisfactory levels of service, preserving high standards of road safety and avoiding the premature erosion of these

benefits, as well as preserving intact routes for planned future roads and road improvements. The policy statement is available to view/download on our website www.nra.ie.

The Authority has produced a number of other guidance documents intended primarily for the planning, construction and operation of national roads but which may also prove to be a useful reference source when scoping EISs for other development proposals. The guidelines concerned, which can also be viewed/downloaded from the Authority's website, include:

- Environmental Impact Assessment of National Road Schemes – A Practical Guide.
- Guidelines for the Treatment of Noise and Vibration in National Road Schemes.
- Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes.
- Road Safety Audit Guidelines (NRA HA 42/04) and Road Safety Audit (NRA HD 19/04).
- Traffic and Transport Assessment Guidelines (TTA),

The comments set out below on the scoping of EISs for proposed development that could impact on or have implications for the capacity, operation and safety of national roads, including proposed new roads or the upgrade of existing roads, are furnished as general guidance only and do not prejudice the Authority's statutory right to make observations, requests for further information, objections or appeals following the examination of any valid planning application which you make and which is subsequently referred to the Authority by the planning authority for consideration in line with the Authority's status as a statutory consultee under planning legislation. It will be a matter for promoters of development/their consultants to determine the relevance of the matters identified having regard to the nature, scale, location and particular characteristics of the proposed development and, based on conclusions reached, to decide the extent, if any, the matters concerned should be addressed in the scoping report/EIS.

In preparing the scoping report/EIS, it is recommended that the developer should:

- Establish the relationship between the location of the proposed development and the national road(s) in the area vis a vis:
 - existing national roads;
 - proposals to provide new national roads or improve existing national roads, and
 - means of access to/from the development to/from the national road(s).
- Establish the traffic carrying capacity of the existing/planned national road(s), traffic volumes currently being catered for, anticipated increase in traffic volumes based on current expectations (exclusive of traffic to be generated by the proposed development the subject of the EIS scoping request) and level of service provided by such roads. (Developers may wish to consult the local planning authority, road authority/County Council – City Council, or National Road Regional Design Office for the area for assistance on the foregoing matters.)
- Identify the trips/traffic generating potential of the proposed development and the manner in which this will be catered for/accommodated, e.g. modal split between roads (national and non-national), public transport, cycling, walking.

- Assess the implications of the trips/traffic generated that are to be accommodated on national roads, including associated junctions/interchanges, for the capacity, operation, level of service and safety of national roads. (Where appropriate, a Traffic and Transport Assessment, carried out in accordance with relevant guidelines and best practice procedures, should be undertaken in respect of the proposed development – the local planning authority can advise in relation to thresholds for TTAs.)
- Identify measures required to improve national roads/increase their capacity so as to cater for trips/traffic generated by the proposed development, including any appropriate traffic management measures. (The Authority, in considering any subsequent planning application in respect of the proposed development, may require submission of details of the private funding arrangements proposed so as to implement identified road improvement and management measures.)
- Quantify the vehicle exhaust emissions from traffic generated by the proposed development and the impacts on air quality along the national road(s) used by such traffic. Local air quality assessments should at minimum focus upon nitrogen dioxide and PM₁₀, as these are the pollutants of greatest concern with respect to road traffic emissions, i.e. they are the pollutants at greatest risk of exceeding the statutory air quality standards. Implications for public health in the area, including that of residents and any other sensitive receptors, should be assessed and indicated.
- Quantify the road traffic noise implications attributable to traffic generated by the proposed development which will use national roads in the area of influence. Impacts should be assessed in respect of the road traffic noise design goals specified in the Authority's Guidelines for the Treatment of Noise and Vibration in National Road Schemes. Impacts for sensitive receptors adjoining the national roads concerned and any new sensitive receptors to be created as part of the proposed development, e.g. new residential areas, should be determined and indicated. Noise mitigation measures should be identified, where appropriate, having regard to the Authority's design goals for road traffic noise on national roads. (The Authority will require the developer, as part of any subsequent planning application, to identify and implement noise mitigation measures, where warranted, where the additional traffic generated by the development results in a breach of the noise design goals on national roads. The Authority will require a similar approach, i.e. identification and implementation of mitigation measures by the developer, where development proposals are brought forward within the zone of influence of existing national roads or of planned new national roads, provision for the construction of which has been made in the planning authority's development plan, in circumstances where the proximity of the proposed development to the national road would result in the breach of the Authority's design goal for sensitive receptors exposed to road traffic noise.)
- Assess and indicate the potential for dust and other material deposition on national roads during the construction and operation of the proposed development, including the implications, if any, for the safety of road users. Potential impacts on national road drainage systems and the receiving environment should form part of the assessment. (Where appropriate, mitigation measures should be specified in the EIS/planning permission application.)

It should be noted that the foregoing matters are not intended to provide a comprehensive list of issues, which should be considered/addressed as part of the EIA insofar as proposed development may impact upon national roads. It remains the responsibility of the developer to ensure the adequacy of the EIA/EIS. As already indicated, the Authority, in offering the foregoing comments and suggestions on the scope of the EIS, retains its statutory right to make observations, objections or appeals in respect of any subsequent planning application.

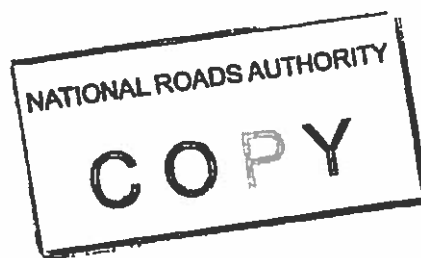
The contents of this letter should neither be interpreted as support for nor an objection to the proposed development that is the subject of the EIS scoping request.

Yours sincerely,

Michael McCormack
Policy Adviser (Planning)

AN BORD PLEANALA	
TIME _____	BY _____
13 SEP 2013	
LTR-DATED _____	FROM _____
PL _____	

Ms. Mairéad Hogan
Senior Scientist
Tobin Consulting Engineers
Block 10-4
Blanchardstown Corporate Park
Dublin 15



27th July 2009

NRA 09-73432

AN BORD PLEANÁLA	
TIME _____	BY _____
13 SEP 2013	
LTR-DATED _____	FROM _____
PL _____	

Re: EIS Scoping Request for the Development of the Cavan – Meath 400kV Project

Dear Ms. Hogan,

I wish to acknowledge receipt of your letter of 06th July regarding the above.

You may be aware that the Authority, in conjunction with local authorities, is undertaking a programme of major improvements to the network of national roads in line with policy set out by Government in Transport 21 (2006-2015) and the National Development Plan, 2007-2013. National roads fulfil a vital function in catering for the movement of people, freight and other goods throughout the country. The Authority's improvement programme involves substantial investment to address deficiencies in the network, improve the safety of road users and achieve a better level of service for users of the network through shorter journey times and greater predictability of journey time duration. The Authority has special interest in seeking to ensure that development will not prevent or compromise plans for new/existing national roads, including indicative, e.g. provision made in planning authority development plans, or approved routes for such roads, nor interfere with the future upgrade of existing national roads.

With regard to the above, it is noted that the preferred 400kV route corridor crosses the existing N3 and the M3, currently under construction, to the north west of Navan. The Authority also notes that the preferred 400kV route corridor crosses the N51 and N52, national secondary routes, to the south west of Navan and to the north east of Kells respectively.

In addition, the preferred 400kV route corridor traverses the line of the Leinster Orbital Route as identified in the Leinster Orbital Route Feasibility Study Final Report issued by the Authority in March, 2009, between Navan and Trim. The Feasibility Study Final Report is available on the NRA's website at www.nra.ie.

The proposal to develop an Outer Orbital Route is included not only in the Meath County Development Plan but also in the National Development Plan and as a key objective of the *Regional Planning Guidelines for the Greater Dublin Area*

The EIS should consider impact and relationship of the proposed development with the existing and proposed national road network in the area with a view to safeguarding the public investment in the national road network and protecting the safety and capacity of existing national roads.

In regards to general scoping issues, your attention is directed to the Authority's *Policy Statement on Development Management and Access to National Roads* which provides comprehensive information for developers and decision makers on the principles guiding the NRA's approach towards proposed developments impacting upon national roads. The principles concerned, as well as the general content of the policy statement, will be informative for those engaged on the scoping of Environmental Impact Statements (EISs) and it is recommended that the document should be consulted. The statement highlights the key policies and issues concerning national roads such as the protection of the substantial investment being made in upgrading the network, maintaining efficiency/satisfactory levels of service, preserving high standards of road safety and avoiding the premature erosion of these benefits, as well as preserving intact routes for planned future roads and road improvements. The policy statement is available to view/download on our website www.nra.ie.

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- Traffic and Transport Assessment Guidelines (TTA),

The comments set out below on the scoping of EISs for proposed development that could impact on or have implications for the capacity, operation and safety of national roads, including proposed new roads or the upgrade of existing roads, are furnished as general guidance only and do not prejudice the Authority's statutory right to make observations, requests for further information, objections or appeals following the examination of any valid planning application which you make and which is subsequently referred to the Authority by the planning authority for consideration in line with the Authority's status as a statutory consultee under planning legislation. It will be a matter for promoters of development/their consultants to determine the relevance of the matters identified having regard to the nature, scale, location and particular characteristics of the proposed development and, based on conclusions reached, to decide the extent, if any, the matters concerned should be addressed in the scoping report/EIS.

In preparing the scoping report/EIS, it is recommended that the developer should:

- Establish the relationship between the location of the proposed development and the national road(s) in the area vis a vis:
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 - proposals to provide new national roads or improve existing national roads, and
 - means of access to/from the development to/from the national road(s).
- Establish the traffic carrying capacity of the existing/planned national road(s), traffic volumes currently being catered for, anticipated increase in traffic volumes based on

current expectations (exclusive of traffic to be generated by the proposed development the subject of the EIS scoping request) and level of service provided by such roads. (Developers may wish to consult the local planning authority, road authority/County Council – City Council, or National Road Regional Design Office for the area for assistance on the foregoing matters.)

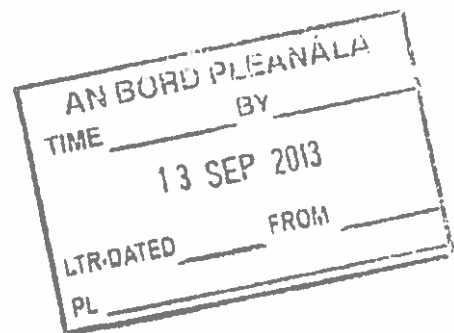
- Identify the trips/traffic generating potential of the proposed development and the manner in which this will be catered for/accommodated, e.g. modal split between roads (national and non-national), public transport, cycling, walking.
- Assess the implications of the trips/traffic generated that are to be accommodated on national roads, including associated junctions/interchanges, for the capacity, operation, level of service and safety of national roads. (Where appropriate, a Traffic and Transport Assessment, carried out in accordance with relevant guidelines and best practice procedures, should be undertaken in respect of the proposed development – the local planning authority can advise in relation to thresholds for TTAs.)
- Identify measures required to improve national roads/increase their capacity so as to cater for trips/traffic generated by the proposed development, including any appropriate traffic management measures. (The Authority, in considering any subsequent planning application in respect of the proposed development, may require submission of details of the private funding arrangements proposed so as to implement identified road improvement and management measures.)
- Quantify the vehicle exhaust emissions from traffic generated by the proposed development and the impacts on air quality along the national road(s) used by such traffic. Local air quality assessments should at minimum focus upon nitrogen dioxide and PM₁₀, as these are the pollutants of greatest concern with respect to road traffic emissions, i.e. they are the pollutants at greatest risk of exceeding the statutory air quality standards. Implications for public health in the area, including that of residents and any other sensitive receptors, should be assessed and indicated.
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- Assess and indicate the potential for dust and other material deposition on national roads during the construction and operation of the proposed development, including the implications, if any, for the safety of road users. Potential impacts on national road

drainage systems and the receiving environment should form part of the assessment. (Where appropriate, mitigation measures should be specified in the EIS/planning permission application.)

It should be noted that the foregoing matters are not intended to provide a comprehensive list of issues, which should be considered/addressed as part of the EIA insofar as proposed development may impact upon national roads. It remains the responsibility of the developer to ensure the adequacy of the EIA/EIS. As already indicated, the Authority, in offering the foregoing comments and suggestions on the scope of the EIS, retains its statutory right to make observations, objections or appeals in respect of any subsequent planning application. The contents of this letter should neither be interpreted as support for nor an objection to the proposed development that is the subject of the EIS scoping request.

Yours sincerely,

Michael McCormack
Policy Adviser (Planning)





Fáilte Ireland

National Tourism Development Authority

1st October 2013

The Secretary,
An Bord Pleanála
64 Marlborough Street
Dublin 1

AN BORD PLEANÁLA	
TIME _____	BY _____
- 1 OCT 2013	
LTR-DATED _____	FROM _____
PL _____	

Ref. 02.VS0002: North – South 400kV Interconnector

Dear Sir,

Fáilte Ireland, the National Tourism Development Authority gratefully acknowledges receipt of your letter of 3rd September 2013 and the invitation therein to provide a submission on the information to be contained in the Environmental Impact Statement for the North – South 400kV Interconnector.

As a prescribed body in the planning process, one of the main objectives of Fáilte Ireland is to advocate for the protection of key tourism assets and amenities. In respect of the proposed North – South Interconnector, it is considered that the character of the landscape and the various aspects of the cultural heritage of the area, within the vicinity of the proposed Interconnector line, are the main tourism amenities that are at risk from the proposed development.

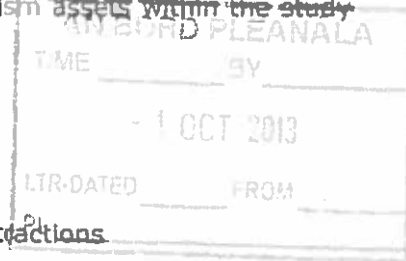
In relation to the provision of electricity transmission infrastructure in the Irish landscape, there are a number of general comments that should be made by way of context before referring to the information to be contained in the EIS:

- Ireland's tourism industry is a geographically dispersed sector which relies on the security and reliability of its electricity supply. It is the view of Fáilte Ireland, therefore, that the development of the 400kV project is necessary infrastructure to ensure the sustainable development of the tourism industry in the northeast.
- Ireland's scenery has been a cornerstone of international tourism marketing campaigns for decades and consistently international visitors to

Ireland rate scenery as an important reason for their trip, followed by the natural/ unspoilt environment. It is the view of Fáilte Ireland that as visitors to Ireland rate the scenic quality of the Irish landscape as one of the primary reasons for visiting, it is essential that the quality, character and distinctiveness of this valuable resource be protected. It is vital, therefore, that proper planning and consideration of the potential visual and landscape impacts be identified and mitigated where possible as part of the Environmental Impact Assessment.

In light of the above contextual points, Fáilte Ireland requests that the following be undertaken as part of the landscape and visual impact assessment of the proposed development.

1. It is considered from a preliminary analysis of the *Preferred Project Solution Report*, July 2013, that the main tourism assets within the study area comprise the following:
 - The Monaghan Way
 - Hill of Tara
 - Bective Abbey
 - Boyne Valley Drive and its associated attractions



Additional tourism amenities and assets in the area which may be potentially impacted upon should also be identified. This can be undertaken in consultation with Fáilte Ireland and data can be provided from our Tourism Content System in GIS format for mapping purposes.

2. The zone of visual influence from these key tourism amenities should be identified; and
3. High quality photomontages should be provided from tourism amenities and should represent the extent of the zone of visual influence identified (i.e. photomontages should be provided for the extent of the Interconnector which is visible). Fáilte Ireland would appreciate the opportunity to agree the location of these photomontages prior to the completion of the landscape assessment.

Please also find enclosed a copy of the Fáilte Ireland Guidelines for the treatment of tourism in an EIS, which we recommend should be taken into account in preparing the EIS for the North - South Interconnector.

Should you have any further queries or require clarification on anything enclosed please do not hesitate to contact me.

Yours faithfully,

Mary Stack
Environment and Planning.

AN BORD PLEANÁLA	
TIME _____	BY _____
- 1 OCT 2013	
LTR-DATED _____	FROM _____
PL _____	

Fáilte Ireland

National Tourism Development Authority

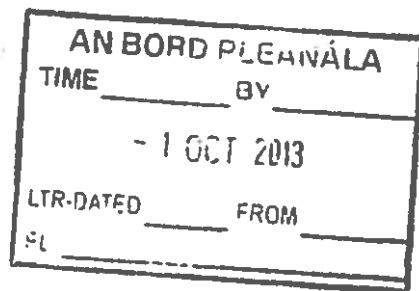
Guidelines on the treatment of tourism in an Environmental Impact Statement

1. Introduction

Tourism is a significant component of the Irish Economy – estimated to employ approximately 190,000 people – and contributing over €5.3 billion in spending to the economy in 2009. The environment is one of the main resources upon which this activity depends – so it is important that the EIS evaluates whether and how the interacting impacts of a project are likely to affect tourism resources.

The purpose of this short note is to provide guidance on how these impacts can be assessed through the existing EIA process. Undertaking an EIA is governed by the EIA Advice Notes published by the EPA. These Advice Notes contain detailed guidance on how to describe and evaluate the effects arising from a range of projects, including tourism projects.

These guidelines were written with the assistance of Conor Skehan, Head of Department of Environment and Planning, Dublin Institute of Technology.



2. Tourism and the Environment

There are two interactions between tourism and the environment.

1. Impacts caused by Tourism Projects
2. Impacts affecting Tourism (e.g. the quality of a destination or a tourism activity)

Impacts caused by Tourism Projects

Tourism projects can give rise to effects on the environment. These are specifically dealt with under a number of Project Types in the Advice Notes, specifically:

12 TOURISM AND LEISURE

- a. Ski-runs, ski-lifts and cable-cars where the length would exceed 500 metres and associated developments. Project Type 20
- b. Sea water marinas where the number of berths would exceed 300 and fresh water marinas where the number of berths would exceed 100. Project Type 10
- c. Holiday villages which would consist of more than 100 holiday homes outside built-up areas; hotel complexes outside built-up areas which would have an area of 20 hectares or more or an accommodation capacity exceeding 300 bedrooms. Project Type 28
- d. Permanent camp sites and caravan sites where the number of pitches would be greater than 100. Project Type 28
- e. Theme parks occupying an area greater than 5 hectares. Project Type 29

Figure 1 The Advice Notes contain detailed descriptions on how to describe and evaluate the effects arising from a range of tourism projects.

Impacts affecting Tourism

Environmental effects of other projects on tourism are not specifically addressed in the Advice Notes. Taking account of the significance of tourism to the Irish economy a specialist topic of 'Tourism' has been prepared to facilitate a systematic evaluation of effects on this sector within the format laid down for other parts of the Environmental Impact Statement.

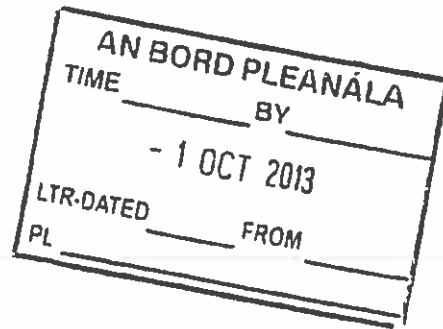
It is not intended that the assessment of effects on tourism should become a separate section of the Impact Statement, instead it is intended to become a specialist sub-section of the topic 'Human Beings' which is currently described in Section 2 of the Advice Notes

3. Tourism in the Existing Environment

Introduction

Visitor attitude surveys reveal that the following factors - in order of priority - are the reasons that tourists visit and enjoy Ireland:

- Beautiful scenery
- Friendly & hospitable people
- Safe & Secure
- Easy, relaxed pace of life
- Unspoilt environment
- Nature, wildlife, flora
- Interesting history & culture
- Plenty of things to see and do
- Good range of natural attractions



It is noteworthy that over half of the factors listed are environmental and that all others are related to the way of life of the people. The following describes how these factors are considered within an EIS, set out under EIA topic headings, and how they interact with tourism.

Beautiful scenery

This is covered in the 'Landscape' Section. Particular attention needs to be paid to effects on views from existing purpose-built tourism facilities, especially hotels, as well as views from touring routes and walking trails. It is important to note that there appears to be evidence that the visitor's expectations of 'beautiful' scenery does not exclude an admiration of new modern developments - such as windfarms - which appear to be seen as indicative of an modern, informed and responsible attitude to the environment.

Friendly & hospitable people

This is not an environmental factor though it is indirectly covered under the 'Human Beings' section of the EIS. The principal factor is the ratio of visitors to residents. This is of less significance in areas with long-established patterns of tourism.

Safe & Secure

This is not an environmental issue - though some of the factors that are sometimes covered under the heading of 'Human Beings' - such as social inclusion or poverty - can point to likely effects and interactions.

Easy, relaxed pace of life

This is not an environmental issue though it is partially covered under 'Human Beings' - see comments above.

Unspoilt environment

This is covered under the sections dealing with '*Landscape*', '*Flora*' and '*Fauna*' and to a lesser extent under emissions to '*Water*' and '*Air*'. In some instances traffic congestion, especially in rural areas, can be an issue, this is usually covered within '*Material Assets*'.

Nature, wildlife, flora

This is principally covered under the headings of '*Flora*' and '*Fauna*' and to a lesser extent by '*Landscape*', '*Water*' and '*Air*'. The principal issues being to avoid any effects that might reduce the health or extent of the habitats. This can occur either directly, by impinging on the site, or indirectly, through emission, that can affect the natural resources, like clean water, which the habitat depends on. It also considers effect on physical access to and visibility of these sites. Occasionally there are concerns about the disturbance or wear and tear of visitor numbers to such sites.

Interesting history & culture

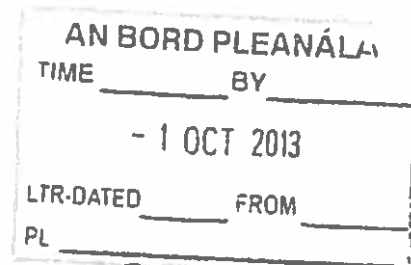
This is principally covered under '*Cultural Heritage*' and, to a lesser extent, under '*Human Beings*'. The principal issues being to avoid damage to sites and structures of cultural, historical, archaeological or architectural significance – and to their contexts or settings. It also considers effect on physical access to and visibility of these sites. Occasionally there are concerns about the wear and tear of visitor numbers to such sites.

Plenty of things to see and do.

This is not an environmental issue though it is partially covered by the '*Human Beings*' section, where the tourism resources of an area are described and assessed.

Good range of natural attractions

This is covered by the '*Landscape*', '*Flora*', '*Fauna*', and '*Cultural Heritage*' sections of the EIS.



4. Project factors affecting Tourism

Introduction

Tourism can be affected both by the structures or emissions of new developments as well as by interactions between new activities and tourism activities – for example the effects of high volumes of heavy goods vehicles passing through hitherto quiet, scenic, rural areas. Tourism can be affected by a number of the characteristics of the new project such as:

- New Developments
 - Social Considerations
 - Land-uses and Activities
- *New Developments* - will the development stimulate or suppress demand for additional tourism development in the area? If so, what type, how much and where? Marinas, golf courses, other major sporting facilities as well as theme parks and larger conference facilities can all stimulate the emergence of new accommodation, catering and leisure facilities often within an extensive area around a new primary visitor facility. Extensive urbanisation and large scale infrastructure as well as certain processing and extractive industries all have the potential to suppress demand for additional tourism – but usually only in the immediate locality of the new development. It should be noted however, that some types of new or improved large scale infrastructure – such as roads – can improve the visitor experience – by increasing safety and comfort or can convey a sense of environmental responsibility – such as wind turbines.
- *Social Consideration* - will the development change patterns and types of activity and land use? Will it affect the demographics, economy or social dynamics of the locality?
- *Land-use* - will there be severance, loss of rights of way or amenities, conflicts, or other changes likely to ultimately alter the character and use of the tourism resources in the surrounding area?

Existing Tourism

In the area likely to be affected by the proposed development, the following attributes of tourism, or the resources that sustain tourism, should be described under the following headings.

Note that the detailed description and analysis will usually be covered in the section dealing with the relevant environmental topic – such as 'Landscape'. Only the relevant finding as to the likely significance to, or effect on, tourism needs to be summarised in this section.

Context

Indicate the location of sensitive neighbouring tourism resources that are likely to be directly affected, and other premises which although located elsewhere, may be the subject of secondary impacts such as alteration of traffic flows or increased urban development. The following should be noted in particular:

- Hotels, conference centres, holiday accommodation – including holiday villages, holiday homes, and caravan parks.
- Visitor centres, Interpretive centres and theme parks
- Golf courses, adventure sport centres and other visitor sporting facilities
- Marinas and boating facilities
- Angling facilities
- Equestrian facilities
- Tourism-related specialist retailers and visitor facilities
- Historic and Cultural Sites
- Pedestrian, cycling, equestrian, vehicular and coach touring routes

Indicate the numbers of premises and visitors likely to be directly affected directly and indirectly.

Identify and quantify, where possible, their potential receptors of impacts, noting in particular transient populations, such as drivers, walkers, seasonal and other non-resident groups.

Describe any significant trends evident in the overall growth or decline of these numbers, or of any changes in the proportion of one type of activity relative to any other.

Indicate any commercial tourism activity which likely to be directly affected, with resultant environmental impacts.

Character

Indicate the occupations, activities or interests of principal types of tourism in the area. – Where relevant, describe the specific environmental resources or attributes in the existing environment which each group uses or values; where relevant, indicate the time, duration or seasonality of any of those activities. For example describe the number of guides, boats and anglers who use a salmon fishery and the duration of the salmon season as well as the quantity and type of local accommodation that is believed to be used by the anglers.

Significance

Indicate the significance of the principal tourism assets or activities likely to be affected. Refer to any existing formal or published designation or recognition of such significance. Where possible provide an estimate of the contribution of such tourism activities to the local economy. For instance refer to the number of annual visitors to a tourism attraction or to the grading of a hotel.

Sensitivity

Describe any significant concerns, fears or opposition to the development known to exist among tourism interests. Identify, where possible, the particular aspect of the development which is of concern, together with the part of the existing tourism resource which may be threatened. For instance describe the extent of a potential visual intrusion onto a site of historic significance which is the main local tourist attraction.

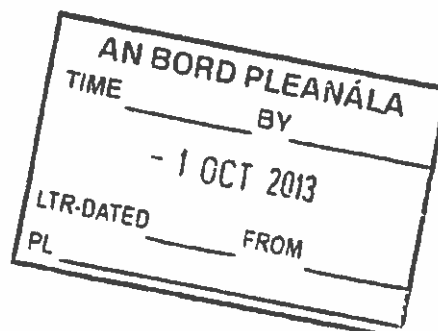
5. Impacts on Tourism

"Do Nothing" Impact;

Describe how trends evident in the existing environment will continue and how these trends will affect tourism.

Predicted impact;

- Describe the location, type, significance, magnitude/extent of the tourism activities or assets that are likely to be affected.
- Describe how the new development will affect the balance between long-established and new dwellers in an area and its affect on the cultural or linguistic distinctiveness of an area. For example describe the effect of a new multi-national population required for an international call-centre located in a Gaeltacht area.
- Describe how changes in patterns of employment, land use and economic activity arising from the proposed development will affect tourism, for example, illustrating how a new industrial development will diversify local employment opportunities thereby reducing the area's unsustainable over-reliance on seasonal tourism.
- Describe the consequences of change, referring to indirect, secondary and cumulative impacts on tourism; Examples can include describing how the new development may lead to a reduced assimilative capacity for traffic or water during the peak of the tourism season or how new urbanism combined with existing patterns of tourism may lead to unsustainable levels of pedestrian traffic through a sensitive habitat.
- Describe the potential for interaction between changes induced in tourism and other uses that may affect the environment - for instance increasing new tourism-related housing affecting water resources or structures
- Describe the worst case for tourism if all mitigation measures fail.



6. Mitigating adverse impact on Tourism

Describe the mitigation measures proposed to:

- *avoid* sensitive tourism resources – such as views, access, and amenity areas including habitats as well as historical or cultural sites and structures.
- *reduce* the exposure of sensitive resources to excessive environmental burdens arising from the development's emissions or volumes of traffic [pedestrian and vehicular], and/or losses of amenity arising from visually conspicuous elements of the development – for example by prioritizing visual screening of views from a hotel towards a quarry.
- *reduce* the adverse effects to tourism land uses and patterns of activities – especially through interactions arising from significant changes in the intensity of use or contrasts of character or appearance – for example by separating traffic routes for industrial and tourism traffic.
- *remedy* any unavoidable significant residual adverse effects on tourism resources or activities, for example by providing alternative access to tourism amenities – such as waterways or monuments.

Kieran Doherty

From: Mary Stack <Mary.Stack@failteireland.ie>
Sent: 01 October 2013 10:06
To: Kieran Doherty
Cc: Eoin McDonnell
Subject: Ref 02 VS0002 North South Interconnector
Attachments: An Bord Pleanála 01 10 13 pdf; ATT00001.txt; ATT00002.htm

Kieran,

As discussed please see attached Fáilte Ireland's submission in relation to the recent EIA scoping request on the North South 400kV Interconnector. A hard copy will follow in the post. I would appreciate it if you could confirm receipt by return email.

All the best,

Mary.

Mary Stack

Destination Development | Fáilte Ireland | 98-95 Amiens St | Dublin 1
T: + 353 1 8847201 | **M:** 086 1200403
W: www.failteireland.ie

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AN BORD PLEANÁLA	
TIME _____	BY _____
- 1 OCT 2013	
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PL _____	



20130927-ABP-VS0002

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

AN BORD PLEANÁLA	
TIME _____	BY _____
- 1 OCT 2013	
LTR-DATED _____	FROM _____
PL _____	

27.09.13

Re: North – South 400kV Interconnector
Ref: 02.VS0002

Dear Sir/Madam,

Thank you for referring information on the 3rd September regarding the above to An Taisce for comment. We note the covering letter from Mr Des Cox of Eirgrid and the *Preferred Project Solution Report*. This early consultation process is most welcomed.

The strategic argument for the interconnector to enhance the network is appreciated. However, the impact on the built and natural environment need to be fully considered, and the route designed and constructed in a manner sensitive to those environmental considerations. In this regard An Taisce is conscious of Natura 2000 sites, protected structures and national monuments in proximity and ask that due care is taken of these in the preparation of an Environmental Impact Statement.

In reviewing the *Preferred Project Solution Report*, it is wish to raise the following:

Landscape Character

The interconnector passes through the spine of County Monaghan, which has a landscape predominantly known for its drumlins features. An evaluation is required, with regard to Monaghan County Council Landscape Character Assessment (2008), to ensure that the landscape is not adversely impacted by the proposed. The Landscape Character Assessment can be used as a basis for informing the impact of the interconnector and in order that local character is recognised in the proposed scheme. The applicant should be aware of concern raised in the Landscape Character Assessment in relation to high voltage power lines:

The future upgrades of the National Transmission Network have the potential to significantly affect the physical landscape of Co. Monaghan which the County Development Plan seeks to protect. Every effort should be made to ensure that any future developments in this area do not have a negative impact on our drumlin landscape, the built environment or the quality of life or our people.

Further care should be taken with regard the landscape character of both Cavan and Meath. Some key components which landscape character consider include: landforms, land-covers; historical patterns; visual

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www.antaisce.org

Company Registration No. 12469 | Charity Reference No. CHY 4741

Directors: J Harnett | J Leahy | M Mahigan | D Murphy | B R. Wood (British) | P H. Wyley | C Stanley Smith (British) | A Uí Bhriain

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and sensory perceptions; historical associations; ecological integrity; and visual impact. Landscape has become an increasingly contentious topic as those who have ties to landscapes view and use it different ways. The term landscape has broad meaning and conjures up a range of expectations for different people.

Human Beings

Taking Monaghan as an example - the most recent census data (2011) reveals an increase in the population of Monaghan from 55,997 (2006) to 60,495 (2011) representing an overall increase of 7.4% similar to that between the periods of 2002 - 2006. The population is generally dispersed throughout rural areas with an estimated 30% being located in urban areas. Significant future population increases are not predicted in urban areas and with a common trend in applications for single rural housing.

Given the above case in Monaghahn and the intent of the County Development Plans in each county to protect quality of life of humans, a full assessment is required on the impact on human beings and residential amenity within the Environmental Impact Assessment.

It is noted that the preferred route, in order to mitigate the impacts have made efforts to avoid nucleated settlements and single rural houses, this is considered reasonable. However, the applicant should have considered alternatives when arriving at this route. Therefore, it is asked of the applicant, within the Environmental Impact Assessment, to provide information on alternative routes, including the impact of the most direct route, notwithstanding single rural houses. The cost of avoiding single-rural houses is considered to be significant for environmental, social and economical reasons and it is important to realise the adverse impacts involved given the scale of the project.

Material Assets, including the Architectural and Archaeological Heritage, and the Cultural Heritage

Tailtean and Donoughpatrick

The area of the Blackwater Valley between the R163 and Proposed Pylon 302 to the crossing with the R147 at Proposed Pylon 313 is a cultural heritage and archaeological landscape of national significance. Telltown is the centre of a Bronze Age / Iron Age complex of earthwork monuments and the location of the ancient Tailtean Games. Donaghpatrick is an early Christian ecclesiastical site associated with Saint Patrick. Any proposed routing in this area needs to address the significance of the layers of cultural heritage and the landscape setting of both the individual monuments and their relationship to one and other.

Boyne River Crossing

The Boyne River crossing at Proposed Pylon 353 to Proposed Pylon 357 includes . This is a point of major sensitivity because of the Special Area of Conservation, landscape quality and quality of riverine corridor. There is a particular impact on the landscape setting of the significant National Monument of Bective Abbey. Proposed Pylon 354 and Proposed Pylon 355 are on elevated ground less than 1 kilometre to the west of the monument. Ecological and archaeological screening is important at this location to mitigate and realise potential impacts.

Old Navan to Kingscourt Railway

Proposed Pylon 315 is in close proximity to the redundant Navan to Kingscourt Railway. An evaluation is required on the proximity of a pylon to the line in terms of future re-use of the line as a commercial or freight railway line or more probably the impact of the pylon on any proposals to develop a walking and cycling greenway along the disused line. An evaluation is required the economic impact on future potential for tourism in the area.



It is asked to consider all the above including their relationship with one another. Furthermore, the impacts of any future decommissioning should be taken into account given the constant changing technologies in this field.

Please acknowledge receipt of this submission and advise further of any outcomes.

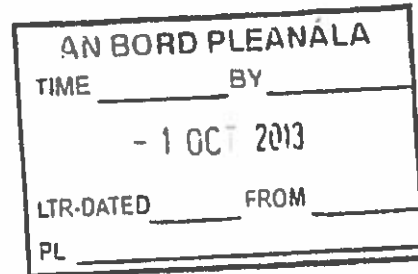
Yours sincerely,

Tomás Bradley
Planning & Environmental Policy Officer
tomás.bradley@antaisce.org

AN BORD PLEANÁLA	
TIME _____	BY _____
- 1 OCT 2013	
LTR-DATED _____	FROM _____
PL _____	

Kieran Doherty

From: SIDS
Sent: 01 October 2013 10:22
To: Kieran Doherty
Subject: FW: 02.VA0002 (North South 400kV Interconnector)
Attachments: 20130927-ABP-VS0002.docx



From: Bord
Sent: 01 October 2013 10:12
To: SIDS
Subject: FW: 02.VA0002 (North South 400kV Interconnector)

From: tomasbradley@gmail.com [<mailto:tomasbradley@gmail.com>] **On Behalf Of** Tomás Bradley
Sent: 01 October 2013 09:58
To: Bord
Subject: Ref: 02.VA0002 (North South 400kV Interconnector)

Sir/Madam,

Thank you for referring the above application to An Taisce for comment.

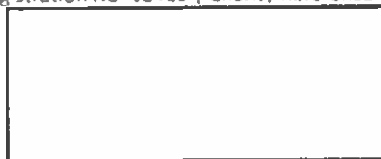
Please see attached submission.

Please acknowledge receipt of our submission and advise us of any outcomes.

Regards,

Tomás Bradley

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Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive



Environmental Health Service,
HSE West,
Civic Offices,
Limerick Road,
Nenagh,
Co. Tipperary.

Tel: 067-46601
Fax: 067-46620

Mr Kieran Doherty
Executive Officer
An Bord Pleanála
64 Marlborough Street
Dublin 1

27th September 2013

Your ref: 02.VS0002
Our ref: ID0043

Dear Sir,

AN BORD PLEANÁLA	
TIME _____	BY <i>103</i>
03 OCT 2013	
LTR-DATED _____	FROM <i>R</i>
PL _____	

**North South 400kV Interconnector
Scoping of EIA**

Reference is made to your letter dated 3rd September 2013 and your request for input into the scoping of the EIA for the North South 400kV Interconnector.

Your request was circulated to the following within the HSE:

Environmental Health Service

Estates

Emergency Planning

Health Protection

Regional Director of Performance and Integration

Responses were made from the Environmental Health Service. The contact within the Environmental Health Service (EHS) is Andrew Sulley (Andrew.sulley@hse.ie), 06746603. Enclosed is a submission from Ms Irene McCabe, Environmental Health Officer, Cavan and Monaghan.

Public Consultation

The EHS consider early public consultation and engagement an important aspect of the EIA process. The EHS have attended public information days and engaged directly with Eirgrid on this project. Section 2 of the Preferred Project Solution Report, July 2013, published by Eirgrid detail the public consultation undertaken and its outcomes.

The EHS are satisfied this accurately reflects the process undertaken and follows good practice models of public consultation and engagement. In particular the EHS requested that the results of the consultation could be identified in the final decision making. The EHS are satisfied that this request has been fulfilled.

Consideration of What Should be Included in the EIA

Chapter 6 of the Preferred Project Solution Report details what Eirgrid consider should be included in the EIA. The EHS has the following comments:

In section 6.2.4.4 details are given that the potential effects on water will be assessed. In the experience of the EHS there are instances in previous EIAs where private residential drinking water wells are not documented and sometimes not included in the EIA. It is therefore essential the EIA includes a process where all private and commercial drinking water sources are identified.

In section 6.2.4.5 consideration is given to inclusion of impacts on air in the EIA. In the experience of the EHS the setting of absolute limits for noise (for example 45 dB(A) night time and 55 dB(A) is not always acceptable in quiet rural areas.

Consideration should therefore be given to assessing the predicted increase in noise above background levels in the EIA and any potential for nuisance from this increase. Baseline must be representative.

Electro Magnetic Fields

The EIA should include assessment and comparison of impacts from the different options of above and below ground, as this has been identified as a significant concern of people during this type of development proposal.

Construction Management

The EIA should include an Environmental Construction Management Plan that considers noise emissions, dust emissions, protection of surface and ground water and waste disposal during the construction phase. Particularly the protection of surface and ground water from accidental spillages of chemicals and increase in suspended solids during excavation activity.

On Site Facilities for Construction Staff

The EIA should include details of site facilities for construction staff, including drinking water sources and disposal of foul waste water.

Yours Faithfully,


Andrew Sulley
Senior Environmental Health Officer

Environmental Health Service,
HSE Dublin/North East,
Cavan and Monaghan,
18 The Grange,
Plantation Walk,
Monaghan.

Tel No: +353 (0) 47-30906
Fax No: +353 (0) 47-62678

25th September, 2013

Ms. Claire O'Dwyer,
A/Principal Environmental Health Officer,
Environmental Health Office,
The Arcade,
Main Street,
Cavan.

Re: The North-South 400kV Electrical Transmission Interconnector.

Planning Ref: 02.VS0002 EHIS Ref: 0043

Type of consultation: Request for information to be contained in an EIA for the North-South 400kV Electrical Transmission Interconnector

Planning Authority: An Bord Pleanála

Dear Claire,

I refer to the correspondence from An Bord Pleanála, requesting the opinion of the Environmental Health Service on what information should be included in the EIA which Eirgrid will be conducting for the North-South 400kV Electrical Transmission Interconnector.

The proposed North-South 400kV Interconnection Development runs through counties Monaghan, Cavan and Meath.

This report is in relation to the development which is proposed to be located in the counties Cavan and Monaghan.

In Eirgrid's Preferred Project Solution Report in July 2013, it states in Chapter 6 "A single EIS will be prepared for the project but, for convenience of users and

legibility, at this stage it is likely that it will be divided into two parts. It is likely that Part A will provide details of the project primarily as it passes through County Meath and Part B will provide details of the project primarily as it passes through Counties Cavan and Monaghan. Chapter 6 also outlines the aspects that Eirgrid will consider in the EIA process.

In identifying the matters to be considered, the Eirgrid report has reiterated that the provisions of Annex IV of the Codified EIA Directive, Schedule 6 to the Planning and Development Regulations 2001 (as amended), and Project Type 20 in the EPA *Advice Notes on Current Practice in the preparation of Environmental Impact Statements* (September 2003) relating to OHLs have been used as a reference point. Recently issued guidance from the Department of Environment, Community and Local Government (DOECLG) – *Guidelines for Planning Authorities and An Bord Pleanála on carrying out EIA* (March 2013) and the European Commission – *Guidance on the Application of the Environmental Impact Assessment Procedure for Large-scale Transboundary Projects* (May 2013), have also been considerations. It also states that the assessment will include the following points;

Human Beings

Potential for Effects: There is potential for effects on amenities, settlement patterns and new land uses. Concerns have been raised in relation to a variety of other areas including tourism, economic activity, employment, property, agriculture and human and animal health.

Socio-Economic

Consideration: This section will take into account the statistical demographic profile of the study area, including population numbers, population change, age profile, employment and unemployment levels, and social class (which includes a study of the type of employment occurring).

Electric and Magnetic Fields (EMF)

Consideration: This will weigh up the potential for impacts from Electric and Magnetic Fields (EMF) arising from the proposed development. The study area for this assessment includes a distance of up to 100m either side of the line. The assessment will also address the nature of electro-magnetic fields (EMF).

Water

Potential for Effects: There is potential for effects on water arising from interference with water courses during construction and ground/surface water quality impairment due to leakages.

Consideration: This will comprise a desktop analysis supplemented by site visits to establish a baseline for ground and surface water in the study area, including water quality.

Air

Potential for Effects: There is potential for effects arising from noise (construction and/or operation) and dust (construction).

Consideration: This will consider the potential for impacts from noise and air quality dust arising from the proposed development.

Consultation

This will focus on how consultation was undertaken for the project and the identification of issues relevant to the EIA through the on-going consultation process.

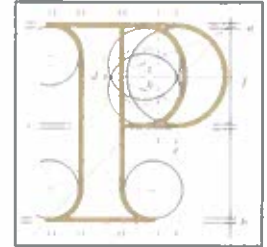
The Environmental Health service would agree that the above areas are covered during the EIA process. Also, it should be ensured that all concerns arising from the public consultations are dealt with in a thorough and transparent manner, using the most up to date expertise and research available.

Yours faithfully,



Irene McCabe
Environmental Health Officer

Your Ref:



Des Cox
EirGrid PLC.
The Oval
160 Shelbourne Road
Ballsbridge
Dublin 4

11th December 2013

Re: North - South 400kV Interconnector

Dear Sir,

In response to your request please now be advised that the following constitutes An Bord Pleanála's written opinion on the information to be contained in the environmental impact statement to be prepared in respect of the above-mentioned proposed development.

1. Introduction

The environmental impact statement for the project must contain the information specified in Paragraph 1 of Schedule 6 of the Planning and Development Regulations 2001 - 2013, and the information specified in Paragraph 2 of Schedule 6 to the extent that this information is relevant to the nature of the development in question and to the environmental features likely to be affected. This shall include details of the environmental impacts during the construction and operational phases of the development and provide precise, clear and unambiguous mitigation measures where such are proposed, including an indication as to who has responsibility for the implementation of such measures, and for the monitoring of the impacts of the development.

The environmental impact statement must contain a summary, in non-technical language of the information contained in the environmental impact statement. The summary should contain an objective statement of the environmental effects of the development and all significant effects and mitigation measures should be referred to therein. The description of the development to be contained in the non-technical summary should explain the proposals clearly and unambiguously in terms of their nature, scale and extent in order to allow the public to understand the EIA process and to make submissions in relation to the development.

Regard should be had to the guidance given for Type 20 projects outlined in the EPA document, Advice Notes on Current Practice in the preparation of Environmental Impact Statements. The environmental impact statement in this case should, in particular, contain information on, and address the issues referred to below. Contributors to the EIS should be identified while any difficulties encountered in compiling the statement should be set out.

The Board notes the previous application for a similar development under An Bord Pleanála ref. PL02.VA0006, which was the subject of an EIS. The applicants may wish to have regard to submissions made in relation to that application in preparing the subject EIS, insofar as they are relevant to effects on the environment.

2. Description of Development

- A full and detailed description of the nature, scale and extent of all aspects of the development, including development within Northern Ireland comprising part of this overall project.

- The description shall be provided in written form as well as by the provision of full and detailed scaled drawings, photographs and photomontages.
- The national / regional / local purpose or need for the proposed development should be identified, in conjunction with any relevant European, national, regional or local policies and/or objectives.
- The location of all proposed development between Woodlands, Co. Meath and Lemgare, Co. Monaghan should be clearly identified.
- The description of the construction phase should include a schedule of works, including timescales, and a construction methodology identifying any special work practices or application of specialised machinery/ equipment. This should also address decommissioning works.

3. Alternatives

An outline of the alternatives considered prior to the selection of the preferred development option. This should extend to each aspect of development, ranging from alternatives considered at national and regional levels, to design details at a local level, and should include:

- Alternative interconnection/ network reinforcement options.
- Alternative technologies, including the use of underground cables or partial undergrounding of the route.
- Alternative corridor options at national, regional and local level, including the most direct route option.
- Alternatives in terms of the design and scale of development/ structures.
- The requirement for the inclusion of a substation(s) along the route.
- Alternative construction methodologies.

The EIS should provide a justification for the preferred route corridor, taking into account the effects on the environment, including the criteria applied in assessing the various alternatives considered. In this context, the likely significant effects on the environment of the various alternative options shall be considered.

If reference is to be made to previous reports not forming part of the EIS, the findings should be summarised and these documents provided as an appendix to the statement.

4. Receiving Environment

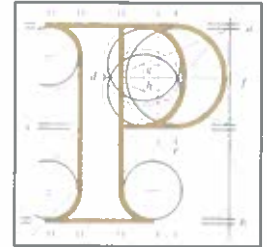
The receiving environment shall be defined to include all areas that would be impacted directly or indirectly by the proposed development. The information contained in the EIS should be based on comprehensive surveys of the area providing a thorough baseline assessment of the existing environment. The extent of baseline surveys undertaken should be identified, including the methodologies and practices applied.

5. Subject Areas

The following is not intended to be an exhaustive schedule of the information required to be contained within the EIS in accordance with the requirements of the Act. It highlights a range of issues that are considered necessary to be addressed to allow for the comprehensive assessment of the proposed development. The EIS should, in particular, cover the matters raised below:

5.1 Humans

- The identification of potential impacts on settlement patterns along the route, including the identification of existing dwellings, community facilities or other public buildings such as schools, health care facilities etc., and any extant planning permissions for such development.
- An assessment of the impact on residential amenities arising from the construction and siting of support structures and overhead lines.



- The identification and assessment of likely operational impacts on residential amenity and human health, including impacts from noise and electromagnetic fields, based on recognised international standards. The assessment should have regard to the most recent epidemiological studies carried out internationally.
- Assess and compare the effects of above and below ground development alternatives.
- An assessment of the likely impacts on the linguistic or cultural heritage of the Gaeltacht area through which the route passes, or on the promotion of Irish as the community language.
- Any implications for, or impacts on, the local, regional or national economy.

5.2 Flora and Fauna

- Baseline data should include an ecological survey of all works sites at an appropriate time of the year. Where ex-situ impacts are possible survey work may be required outside of the development sites.
- Assess the impacts on flora, fauna and habitats with particular regard to:
 - Natura 2000 sites and other (proposed) designated sites;
 - Habitats and species listed on Annexes I, II and IV of the Habitats Directive;
 - Birds listed on Annex I of the Birds Directive and important habitats for birds including nesting, feeding / wintering areas and flight corridors;
 - Habitats that can be considered to be corridors or stepping stones for the purpose of article 10 of the Habitats Directive;
 - Other species protected under the Wildlife Acts, Red Data Book species; and biodiversity in general;
 - The assessment should include the indirect effects of construction activity, including construction access, as well as long-term impacts in terms of fragmentation and severance.
- An assessment of potential impacts on the aquatic environment during construction and operation, including impacts on water table levels or groundwater flow which may impact on wetland sites some distance away.
- Any proposed mitigation measures should be identified in a construction management plan which must be included as part of the EIS / NIS.
- The EIS should address the issue of invasive alien plant and animal species, and methods to ensure they are not introduced or spread.
- An assessment of the extent and cumulative impact of hedgerow removal or linear woodland loss along the route. Mitigation should include suitable planting of native species and timing of works outside the nesting season.
- Identify any requirement for licenses or derogations arising.

5.3 Soil

- An assessment of potential soil erosion, particularly where it affects priority habitats, designated conservation areas, and in the vicinity of surface waterbodies.
- Submission of a construction method statement, identifying areas of particular sensitivity which require specific construction mitigation measures, including areas of peat.

- Identification and assessment of potential impacts on sites of geological heritage interest, including Altmush Stream and Galtrim Moraine.

5.4 Water

- Identification and assessment of the potential water quality impacts of excavation and construction activities proximate to or across watercourses along the route corridor, inclusive of the effects of nutrient release from site clearance or vegetation decomposition.
- An assessment of the potential hydrogeological impacts, including potential impacts on wetlands and drinking water sources.
- Submission of a construction method statement and management plan addressing potential impacts on water quality, including measures to protect water quality when diverting field drains or pumping groundwater which may impact on watercourses some distance away.

5.5 Air and Climate

- Air and Climate: Minor issues not requiring significant studies.
- Noise: Description and assessment of the noise environment at construction and operational phases, clearly measurable against the existing ambient noise environment.

5.6 Landscape

- An overview of defined landscape character areas affected, having regard to the landscape character assessments which inform the development plans for each county through which the route passes.
- Identify the area of visual influence of the development.
- Assess impacts on landscape character and visual amenities, having particular regard to designated landscapes and views of amenity value including protected views / scenic routes and on the setting of the main tourism assets.
- Regard should be had to the impacts of the development on the character and setting of sites of cultural and historic interest and on historic landscapes, including for example Bective Abbey, Donaghpatrick, Teltown.
- Identify historic demesne landscapes along the route and assess potential impacts thereon.
- The visual impacts of the development should be demonstrated by the submission of a series of scaled and accurate photomontages of all elements of the proposal, to include impacts on protected views / scenic routes.
- The potential for alternative routing or partial undergrounding in sensitive landscape areas should be addressed.
- Where separation between towers is reduced below average with resulting visual impacts, the rationale for the route / design approach adopted should be identified.
- Regard should be had to the cumulative visual and landscape impacts of the development with the existing and proposed 110kV and 220kV network in the area and other existing and permitted developments as appropriate.

5.7 Material Assets

- Identify the enhancements to existing electricity network infrastructure.
- Identify and assess public road crossings, including the construction methodology. Particular regard should be had to the relationship with the national primary and secondary road network and with the proposed Leinster Orbital Route, to include issues of clearance and separation.



- Information on the likely effects on public utilities and services along the route corridor, and in particular any proposed re-routing of overhead electricity lines.
- A construction traffic management plan will be required, which should address stringing operations, road closures / detours and impacts on railway infrastructure.
- Identify the means of access for construction and on-going maintenance and the treatment of new or widened construction entrances.
- Assess the likely land use impacts, including restrictions on existing uses such as agriculture or commercial forestry.
- An assessment of the likely effects on the amenity / tourism value of the area, including designated tourist routes (e.g. the Monaghan Way) and possible impacts on fishing and fisheries tourism.
- Address impacts on the potential future use of disused railways.
- Assessment of potential impacts on aviation transport, including impacts on Trim airfield.

5.8 Cultural Heritage

- Identification and assessment of potential impacts on archaeological heritage, including an appraisal of all recorded monuments potentially impacted on during construction activities and an assessment of the visual impact on listed sites. This should include impacts on the character and setting of features of interest as well as the relationship between sites.
- Particular areas of social, cultural and historic interest to be considered include Bective Abbey, Donaghpatrick, Teltown Zone of Archaeological Amenity, Muff Crossroads.
- Identify any pre-application archaeological excavations or site investigations undertaken. Describe the rationale for the approach adopted with regard to such pre-application investigations, particularly for areas of known archaeological potential.
- Identification and assessment of the effects on architectural heritage in the vicinity of the route corridor, including potential impacts on historic buildings or structures and their setting, and demesne landscapes. This should include Brittas House, where the line crosses the driveway, and views to and from Whitewood House.
- The indirect effects of construction activity, including construction access / routes, on structures and building should be considered.
- The impact on longer views from sites of national importance and significance should be considered and assessed.

5.9 Transboundary Effects

This written opinion refers to the scoping request submitted to the Board on 20th August 2013 in relation to that part of the overall project occurring within the Republic of Ireland.

The nature of the project, however, gives rise to a requirement to consider the issue of potential transboundary impacts. Regard should therefore be had to the provisions of the European Commission document, "Guidance on the Application of the Environmental Impact Assessment Procedure for Large-scale Transboundary Projects" (2013). In particular the prospective applicants are advised that while they are required to comply with national EIA requirements for each jurisdiction, they should also prepare a joint environmental report that covers the whole project and assesses its overall effects.

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in particular cumulative and significant adverse transboundary effects. This joint report should ensure the implementation of a common approach and methodology for the identification and assessment of impacts arising across the overall project.

Many of the comments contained in this written opinion are relevant to the assessment of the impacts of those sections of the project proposed within the jurisdiction of Northern Ireland. The prospective applicants are, however, advised to consult with the relevant authorities in Northern Ireland with regard to the information to be contained in the EIS. The EIS should identify and assess any relevant projects occurring in Northern Ireland which could give rise to likely cumulative impacts, including that section of the proposed 400kV interconnector which occurs within Northern Ireland.

Notwithstanding the above, the prospective applicants are referred to the attached correspondence from the Department of the Environment (Northern Ireland), with respect to the information to be contained in the environmental impact statement. This includes, in particular,

- The requirement for a comprehensive assessment of potential impacts on the historic environment of Northern Ireland, including impacts on known and previously unrecorded archaeology, and recommendations for mitigation measures.
- The methodology to be employed in the assessment of landscape and visual impacts of the proposed development.

6. Conclusion

In the event of significant effects on the environment being identified, particularly in relation to the topics referred to above, the EIS should contain a clear description of the measures envisaged in order to avoid, reduce and, if possible, remedy any significant adverse effects identified. Baseline surveys should be undertaken over appropriate periods to provide sufficient information on potential impacts arising from the proposed development.

A summary of all proposed mitigation measures should be prepared, as an appendix to the EIS, which should identify the party responsible for the implementation of each measure. In the event of monitoring being proposed as mitigation, the EIS should identify relevant trigger levels and associated actions to be taken when those levels are exceeded.

The Board notes that, as the Pre-Application Consultations have not concluded to date, other issues may arise at future meetings which may require consideration and which thereby may potentially affect the completeness of the Board's written opinion on the information to be contained in the environmental impact statement, as set out above.

For your information, please find enclosed copies of the submissions that were received by the Board from the following parties in relation to the matter:

- Minister for Arts, Heritage and the Gaeltacht, Development Applications Unit,
- The Environmental Protection Agency,
- Meath County Council,
- Cavan County Council
- Monaghan County Council,
- National Roads Authority,
- Fáilte Ireland,
- An Taisce - the National Trust for Ireland,
- Health Service Executive / Environmental Health Service,
- Inland Fisheries Ireland,
- Department of the Environment (Northern Ireland).



If you have any queries in relation to the matter please contact the undersigned officer of the Board. Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Kieran Doherty
Executive Officer
Direct Line:01-8737248

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