

Our Ref: PC10001

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

16th December, 2014.

Dear Mr. Geoghegan,

I refer to North-South Electricity Interconnector Project and to the draft application file submitted to An Bord Pleanála (Competent Authority) under the PCI Process on 7th November, 2014.

You are aware that by letter dated 13th October, An Bord Pleanála (Competent Authority) identified, on the basis of a proposal, the scope of material and level of detail of information to be submitted as part of the application file.

An Bord Pleanála in its role as competent authority under PCI has examined the draft application file under Article 10.4(c) of Regulation 347/2013 and lists hereunder missing information (addressing subjects identified under Article 10.4(a)) which is requested to be submitted.

Missing Information

- The description of the proposed development contained with the draft application file documentation and particularly the structure heights shall be such to ensure that these are consistent with the height of structures shown on the proposed Tower Outline Drawings specified on drawing numbers MT-008-001 to MT-008-007.
- Where addressing the matters set out below all the relevant Volumes of the EIS (including the Non-Technical Summary) should be reviewed. Where appropriate, the numbering used in the Scoping Opinion given by An Bord Pleanála (SID) of 11th December, 2013 is used.

- 2.1 Introduction

The authors of, and contributors to, relevant sections of the EIS should be identified.

- 2.2 Description of Development

Notwithstanding comments in the EIS, further detail should be provided with regard to the nature of works and likely impacts arising from any future decommissioning of the proposed development.

- 2.5 Subject Areas

- 2.5.1 Humans:

Documentation should confirm whether there are any relevant extant planning permissions, or current planning applications as appropriate, along the route of the proposed development.

- 2.5.2 Flora and Fauna:

Notwithstanding the current stage in the process, the draft Construction Environment Management Plan (CEMP) should be prepared based on the information available at this time. The CEMP should have regard to mitigation measures identified in Natura Impact Statement, as well as the Environmental Impact Statement and greater elaboration on the format, structure and content of the CEMP is required. Examples or extracts from previous similar CEMPs may also assist in this regard.

- In 6.5 of Volume 3D, clarification is required with regard to the last bullet point in section 6.1.2.

- 2.5.6 Landscape:

Where significant impacts on landscapes / demesne landscapes are identified, the EIS should address the potential for partial undergrounding of the line to mitigate those impacts.

- 2.5.7 Material Assets:

The indicative route of the proposed Leinster Orbital Route and relationship with the proposed development should be identified, based on best available information.

Confirm where, if any, re-routing of existing overhead lines will be required.

A preliminary construction traffic management plan should be submitted outlining how these matters will be addressed. In this respect Eirgrid's attention is drawn to the pre-application consultation discussions held with An Bord Pleanála (SID) in connection with file 02. VC0054 on the 23rd December 2013.

2.5.8 Cultural Heritage:

The EIS should confirm that consideration was given to potential impacts on the relationship between sites of archaeological, cultural and architectural interest as well as to impacts on individual sites and features.

Other Matters:

- Clarify reference under Item 4.30 on pages 11-14 of Volume 3B, to “See 4.34 below.” under monitoring.
- Correct reference to “Error! Reference Source not found.” in paragraph 1 of pages 14-21 of Vol. 3C
- The EIS should ensure that all figures and illustrations contained in Volumes 3A – 3D are fully legible. This relates in particular to the following:

Figure 2.1 on pages 2-4 of Volume 3B.

Figure 6.1 on pages 6-3 of Volume 3B.

Figure 7.10 on pages 7-22.

Figure 4.1 on pages 4-19 of Volume 3B.

- Ensure that each Volume of the EIS and Appendices is provided with a Table of Contents.
- Copies of all background reports and studies referenced in the EIS should be submitted with the application. These should include, in particular, the following documents:

Meath-Tyrone Report Review by the International Expert Commission August, November 2011 - January 2012;

Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure, July 2012;

Grid25 Implementation Programme (IP) 2011-2016 and accompanying Strategic Environmental Assessment (SEA) both May 2012;

EirGrid’s Project Development and Consultation Roadmap, 2012.

The PB Power Preliminary Briefing Note (Parsons Brinckerhoff, Power Division [PB Power], 2008) and subsequent PB Power Study (2009).

The TEPCO Study (TEPCO, 2009).

The TransGrid Study (TransGrid, 2009).

The Ecofys Study (Department of Communications, Energy and Natural Resources (DCENR) 2008). A Study on the Comparative Merits of Overhead Electricity Transmission Lines Versus Underground Cables.

The PB Power Technology and Costs Update (PB Power, April 2013 and Supplementary Note July 2013).

Europacable and ENTSO-E (Feasibility and Technical Aspects of Partial Undergrounding of Extra High Voltage Power Transmission Lines submitted to the European Commission (December 2010).

- The draft application file (Volume 4) is accompanied by a Joint Environmental Report (JER) as proposed in the EU document Guidance on the Application of the Environmental Impact Assessment Procedure for Large-scale Transboundary Projects (2013). This document makes reference to the consolidated Environmental Statement lodged in conjunction with planning applications for that section of the proposed development within Northern Ireland. This consolidated Environmental Statement should be provided and accompany the JER as an Appendix to that document.
- It is noted however that within the Volumes supplied there is missing information/documents reflecting the ongoing work by Eirgrid in preparing for the application submission and consultations being carried out/required e.g. within Volume 1A (Statutory Documents) and 2B (Public and Landowner Consultation Report and Appendices). Your attention is drawn to this missing information. In addition it is noted that the draft Public Notice contained within Volume 1A (Statutory Documents) omits reference to article 217 of the Planning and Development Regulations, 2001 requiring that any submission shall state the subject matter of the submission and the reasons, considerations and arguments on which it is based in full. The draft Notice also omits reference to the absolute discretion of An Bord Pleanála to determine whether or not an oral hearing should be held in any particular case and directing the public to the Guide on An Bord Pleanála's website. Note also that the notice should refer to likely effects on the environment of the proposed development.
- It is necessary to supply certain documentation in the Irish language. You are invited to submit such appropriate supporting public notices or documentation in the Irish language with the missing information requested.

In relation to the examination of the draft application file for any missing information we inform you as follows:

No merits based assessment of the draft application file was carried out. Nor was any conclusion reached on whether any issues addressed in the documentation provided had been adequately addressed for the purposes of a merits based review.

The proposed line of the project was not inspected.

The content of the draft public notice was examined in relation to the format and generic requirements pertaining to the type of application. The content relating to the development description is a matter for the project promoter subject to your attention being drawn to the first bullet point on page 1 of this letter.

The names and locations of townlands given in the draft public notice were not examined in relation to the proposed line of the project.

The strategic infrastructure application will involve the input of the public and prescribed bodies. The project promoter should be aware that the missing information identified in the PCI process does not preclude An Bord Pleanála (SID) from seeking additional or further information should this be deemed necessary in the interests of proper planning and sustainable development.

Yours sincerely,

Diarmuid Collins,

Senior Administrative Officer,

PCI Unit.