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Appendix 3

Review of public submissions

Review of public submissions

A key aspect of this review was to consider the specific feedback that the public, stakeholders, elected representatives and media provided in their comments on our consultation process for our major projects over the last number of years.

There are patterns that are common across all projects. Initially, the news of an investment in a grid project is generally well received and viewed positively. However this shifts to considerable concern and opposition when route corridors are identified.

This pattern was consistent across the major grid projects – such as the Grid West Project in the west of Ireland. However, when route corridors were published on the Grid Link Project (from Cork to south Kildare) the volume of public submissions was unprecedented.

Our approach to consultation is constantly revised and adapted according to the scale, location and stage of a project.

A number of focused periods of consultation take place during the five key stages of project development - four of which are undertaken prior to making a planning application. Through all stages of the process, we work to keep the public, and other stakeholders, informed about the project, providing opportunities for input and feedback.

We seek to engage with people who may be affected by the planned transmission infrastructure from the earliest stage of project development, through to project completion. When we first launch a project and identify the study area where a project may be located, a comprehensive consultation plan is developed. This is designed to ensure as many people as possible are made aware of a project.

Some of the methods used in the initial phase of the consultation could include: Opening up dedicated communications channels such as information lines, taking out print and broadcast advertising, organising meetings and briefings, and possibly opening information centres.

In the development of grid infrastructure projects EirGrid has developed a five stage process which outlines the stages involved in the development of a grid project, what steps are taken, what consultation will take place before applying for a planning application and finally the construction stage.

In assessing the consultation process, all stages of consultation that the projects have undertaken have been reviewed to reflect the change, if any, of the perception or experience of EirGrid's consultation process.

The following sections cover the feedback received in the last two years on the major grid projects.

5.1 Feedback from Grid Link Project Consultation Process

5.1.1 Background

There have been three phases of non-statutory public consultation on the Grid Link Project since April 2012.

The first consultation ran from 12th April – 8th June 2012. Members of the public were asked to comment on the proposed study area map, identify constraints that should be considered for further review, and provide feedback on how corridors should be developed.

The second consultation ran from 27th August – 22nd October 2012. Members of the public were asked to comment on the Constraints Report and provide feedback on how EirGrid should develop corridors for the Grid Link Project.

The latest, third consultation ran from 3rd September 2013 and closed after an extended 18 week period on 7th January 2014. As part of this consultation EirGrid published the Lead Consultant's Stage One Report, which outlined the work carried out to date and identified a number of feasible 1km wide route corridor options for a new 400 kV overhead power line. Members of the public were asked to comment primarily on the route corridor options and the evaluation criteria by which these corridors will be examined.

All three non-statutory consultations were publicised through national and local media advertising as part of an overall integrated communications campaign. Thirty three open days were held throughout the study area, five Grid Link Project information centres were opened within the project area in counties Kildare, Cork, Tipperary, Wexford and Carlow. The project team distributed project information at 120 public information events within the project area. Information was also distributed to thousands of individuals and groups through mailouts on four occasions using the EirGrid Central Stakeholder Communication System.

Regular briefings were carried out with local authorities and elected representatives. A series of regional stakeholder forums were held for sectoral organisations (tourism, academia, health, environment, business, sport, community groups) in Cork, Waterford and Carlow. In addition, the project team held meetings with dozens of community organisations and local interest groups in the project area both through initiation and by request.

527 submissions were made by members of the public during the first round of consultation. 278 submissions were made by members of the public during the second round of public consultation.

Over 38,000 submissions were received as part of the third consultation. These included a significant number from individual members of the public along with submissions from statutory bodies, farming organisations, industry groups, elected representatives and local community groups.

The following feedback has been received from members of the public on the consultation process undertaken to date:

5.1.2 Grid Link Consultation No. 1

(12th April - 8th June 2012)

There were many comments made on the public consultation process. With little exception all stakeholders who commented on public consultation recognise that it forms a crucial element of the development of the Grid Link Project. Stakeholders also stressed the importance of communicating the project message to the community.

Some stakeholders felt that the extensive media coverage around the time of the project launch has raised awareness of the project and that it has been well announced.

A number of stakeholders welcomed the opportunity to engage with the project and participate in consultation at this early stage.

There were also many comments on the locations for the Information Centres and the Open Days with some stakeholders concerned that there was no Information Centre in the northern part of the study area or that Open Days were not held in all counties.

With regards to the Open Days it was recognised that they are useful but one-to-one engagement is also needed as sometimes voices can get lost in a crowd. Suggestions were also made regarding potential locations where Open Days should be held in the future.

Specific local communications channels were also highlighted with recommendations made to use parish bulletins and/or parish emails.

Where possible, the project team requested feedback on which local stakeholders should be included in the consultation and many suggestions were made about local groups and other stakeholders who should be included on the project mailing list.

Some stakeholders believe that attention needs to be paid to the quality and nature of the mapping provided. Some felt the study area map was too vague and that the motorway network should have been highlighted better. Some felt that the line delineating the boundary of the study area was misleading as some believed this to mark a possible route for the project.

References to consultation activities on other projects were also made. In particular, the M9 public consultation, which some believed made no difference as they felt their comments were not taken on board. One stakeholder referenced the public consultation for the Shanganagh Bray Waste Water Treatment plant as a good example of how to do things.

Some stakeholders were concerned that the consultation was a meaningless exercise as, if the decision has already been made on undergrounding, then the consultation has no value.

One stakeholder requested that EirGrid avoid using the standard response regarding health and EMF(i.e. EirGrid adhere to all recognised national and international guidelines). The stakeholder stated that Ireland has no national guidelines and the international guidelines are insufficient and not based on the precautionary principal.

Others stated the importance of providing reassurance to the public advising that EirGrid needs to get the messages about health out to the public. Elected representatives requested regular briefings with a suggestion that EirGrid make use of the AV room in Dáil Éireann.

5.1.3 Grid Link Consultation 2

(27th August – 22nd October 2012)

There was mixed feedback in relation to the advertising for the project with some stakeholders advising that they heard the event on local radio or in the local paper, while others advised that they found out through word of mouth and could have missed the opportunity to participate in the consultation.

One stakeholder felt that there is a high level of concern regarding power lines due to misinformation from third parties. The stakeholder felt that EirGrid should do everything in their power to rectify the situation.

Other stakeholders felt that EirGrid needs to consider how the information for phase three of the project will be presented to communities to ensure everyone potentially affected by the project has an opportunity to participate in the consultation. Community workshops were suggested to achieve this.

It was also suggested that there should be open days in North Tipperary as it is still a separate local authority and part of the study area.

Another suggestion related to the use of parish bulletins to advise of the consultation, referring the team to the diocesan website for all necessary information.

The legitimacy of the consultation process was questioned by some stakeholders. Stakeholders advised that in their view a similar process undertaken for the N8, resulted in the most constrained corridor rather than the least constrained being selected. Stakeholders requested that the information on how corridors are identified and selected needs to be transparent.

While most consultees welcomed the opportunity to be informed and involved in the project at this point, some felt that as there is no line yet on the map the consultation was a waste of time. Stakeholders recommended that as soon as EirGrid are aware of their findings that they publish them straight away.

Stakeholders were also concerned that going from corridor options to the preferred corridor with a line was too big a step and it was also recommended that EirGrid should talk to local authorities in advance of publishing any corridor options.

5.1.4 Grid Link Consultation 3

(3rd September 2013 – 7th January 2014)

The below feedback does not represent all feedback received as the review of same is ongoing. The below is reflective of the key themes of feedback received by the project team.

A large amount of feedback was provided on how EirGrid has engaged with members of the public to date as part of the development of the Grid Link Project.

A key criticism by members of the public of the third consultation was in relation to the scope of the consultation with many members of the public questioning why an underground option had been ruled out at an earlier stage. Members of the public also queried why a large scale consultation was not undertaken for Grid25, when the strategy was launched in 2008.

Many members of the public advised that they had only become aware of the Grid Link Project and the route corridor options during the first month of the third consultation. Many submissions suggested that insufficient time and information was provided and

that more could have been done to generate awareness of the project in advance of the third consultation. One stakeholder questioned why a consultation had not taken place when the broad strategic corridors, outlined in the stage one report, were identified.

A recurring suggestion was that the project should have organised an information mail-out to all homes and businesses located within the route corridor options. Dissatisfaction that some local print outlets did not carry advertisements at the earlier stages of consultation was expressed.

Many members of the public advised the project team that they had only become aware of the Grid Link Project through word of mouth in their locality or through leafleting by local groups. Some said that they had seen/heard print/radio ads in the national and local media. Others felt that national television advertising should have been incorporated.

Members of the public expressed the belief that by publishing a number of route corridor options there was a deliberate intention to "divide and conquer' affected communities and some maintained that EirGrid has already chosen its preferred corridor.

A small number of stakeholders expressed a belief that EirGrid may be in breach of Aarhus convention in taking key decisions before the consultation process commenced.

There was a high level of criticism in relation to the absence of a project information centre in Co. Waterford with many members of the public and local representatives requesting that an office be opened in Dungarvan.

Criticism of EirGrid's EMF & You brochure was made by several elected representatives and members of the public. Some thought it was too text-heavy and that the scientific detail should be presented graphically. While others maintained that further information on EMF in relation to underground cables should be included. There was also some feedback on the third project information brochure with some stakeholders commenting that the word 'pylon' was not included although pictures of pylons were.

The impact of consultation feedback in the context of how the information would be used as part of the corridor evaluation process was also raised.

One national representative criticised the information provided to members of the public in relation to constraints. This representative requested that all constraints be clearly identified on maps with the corridor options visible so that each constraint within the corridor can be identified by members of the public.

Local opposition groups expressed disappointment at EirGrid's policy in relation to not attending large public meetings. Criticism was received relating to the length of time it took to respond to queries and submissions with some members of the public requesting quicker response times.

Frustration with the depth of information available to members of the public in relation to specific topics of concern was expressed. The availability of information with regard to detailed questions was highlighted.

Consistency of messaging from the project team was highlighted as an issue with many stakeholders stating that they received conflicting information on specific topics from different members of the project team and that messages provided by the team did not always appear consistent with what was represented by project spokespeople in the media.

Comment was received on the project team engaging with member of the public during the consultation period at information centres, open days and via the project phone line. Many stakeholders felt that the team had insufficient information or experience to answer questions while others felt there was an arrogant approach being adopted by the project team.

5.2 Feedback from Grid West Project Consultation Process

5.2.1. Background

There have been four phases of public consultation on the Grid West Project since May 2012.

The first consultation ran from 6th – 15th June 2012. Four open days were held across the region and were attended by 130 members of the public. Members of the public were asked to comment on the proposed study area map, identify constraints that should be considered for further review, and provide feedback on how corridors should be developed.

The second consultation ran from 21st August to 21st September 2012 with five open days held across the region which were attended by 345 members of the public. The public was asked to comment on the Constraints Report and provide feedback on how EirGrid should develop corridors for the Grid West project.

The third consultation ran from 5th March to 16th April 2013 with eight open days held across the region which were attended by 690 members of the public. As part of this consultation, EirGrid published the Stage One Report, which outlined the work carried out to date and identified 16 feasible 1km wide route corridor options for a new 400 kV overhead power line and identified a least constrained corridor. Members of the public were asked to comment primarily on the route corridor options and provide feedback on the project.

The fourth round of engagement took place in October 2013 when EirGrid confirmed the least constrained corridor for the Grid West project. Five open days were held along the corridor and were attended by 1,220 members of the public. Immediately following this, a process of consultation with landowners affected by the initial indicative line route was commenced.

All four consultations were publicised through local media (radio and press) advertising as part of an overall integrated communications campaign and 22 open days were held throughout the study area.

Regular briefings were carried out with local authorities and elected representatives. At the beginning of the third and fourth rounds of consultation, national and local public representatives were also briefed face to face by the project team, recognising their important role as a conduit to the general public.

The project team also held meetings with dozens of community organisations and local interest groups in the project area both through initiation and by request.

¹ At time of this review of submissions, the fifth round of consultation on the Grid West project had not taken place. In July 2014, following feedback from the public EirGrid carried out consultation on an emerging preferred underground corridor and sought input on proposed changes to the selected overheard corridor.

As part of on going engagement with the public, in January 2013, EirGrid wrote to over 200,000 homes in Counties Mayo, Galway, Roscommon, Sligo and Leitrim, to generate awareness of the project. Project Information was also disseminated at six outreach events within the project area during the summer 2013 and feedback from the public on this initiative was 80% positive. A project information office was opened in Castlebar in June 2012 and two additional information offices were opened in Ballina and Ballaghaderreen in January 2014.

The following feedback has been received from members of the public on the consultation process undertaken to date:

1.2.2 Grid West Project Consultation No. 1

6th June - 15th June 2012

The initial launch of the Grid West project focused on local media and was well received. While it generated a reasonable level of interest from media, it generated a low number of calls to the hotline or the Information Centre. While attendance levels at the first set of open days was relatively low (130), those who attended were generally appreciative of the effort made, positive towards the consultation process and supportive of the project.

Generally stakeholders welcomed the Roadmap and the commitment on EirGrid's behalf to engage in consultation at key stages of the process.

In the absence of more information on the project (e.g. lines on maps), the consultation process was a significant part of all conversations.

The most frequent points expressed were that:

- On-going consultation is essential, with communities in general and, in particular, with landowners and their representatives, e.g. IFA
- Information should be available on how landowner compensation would be determined

A number of stakeholders cited other infrastructure projects in the west as examples of the use of effective or ineffective consultation processes, reflecting a keen interest in, and knowledge of, previous consultation exercises in the region. A common comment was that a lack of or inadequate early consultation had severely hampered other infrastructural projects.

Other comments, observations and queries raised under this theme included:

- The project team should seek to engage with local schools;
- EirGrid should consider innovative forms of community gain which, with the delivery
 of the project, would benefit individuals and communities affected;
- Mayo County Council is developing a policy in which the implementation of community gain would be provided by infrastructure projects;
- There are significant 'legacy' issues especially around the Flagford area from previous line developments;
- County Community Forums provide a good facility for engaging with community groups;
- While early consultation is desirable, EirGrid may find that in-depth engagement only occurs after potential corridors/routes are published.

1.2.3 Grid West Project Consultation No. 2

21st August to 21st September 2012

The need for effective consultation was a strong feature of feedback from this round. Again this probably reflected the fact there was still no indication of corridor or line routes.

Whilst the extent of public consultation to date was appreciated, the need for extensive on-going consultation was highlighted in several submissions, especially with landowners and community groups.

There was broad support for the project and for the process of consultation, with recognition of the potential development benefits for a project of this nature for the western region.

For example, one typical submission emphasised the importance of courteous respect in explaining the project to individual farmers likely to be affected and in explaining the benefits in clear, simple terms.

A number of submissions highlighted the believed ineffectiveness of consultation processes previously carried out by other infrastructure projects in the region, noting how it was felt that developers had alienated local communities and created widespread opposition to individual projects. It was commented that this could potentially have an adverse effect on how communities engage with future infrastructural projects, and the importance of a transparent and genuine public consultation process.

Some submissions also made reference to the Flagford-Srananagh 220kV project, noting that there are legacy issues around the Boyle area resulting from this project. Two stakeholders who had been involved in a previous line development were critical of EirGrid for again seeking to bring lines through their area and cited concerns about property devaluation.

A significant number of stakeholders reflected positively on the detail contained in the constraints maps and the level of information gathered by the team. When offered the opportunity the majority of stakeholders expressed their wish to be kept informed of the project and progress as it moved forward.

There were some submissions relating to what is perceived as the slow development of the project. For example, one submission asked why EirGrid was not developing the project at a quicker pace, noting the importance of consultation and non-confrontation with the local community. A separate submission also noted that there was already a gas line routed through the stakeholders land and that he wished to see the electricity line being built quicker. Another submission queried why the development had not been built before now given the renewable energy projects already underway in the area.

Submissions were received highlighting the potential for engagement with schools in local areas. There was interest in particular in how details of the ongoing work could be brought to life for local schools demonstrating to pupils the mapping and environmental work associated with a large scale infrastructure project.

There was also particular interest in how the routes will be selected, and which are the most likely at this stage of the project.

1.2.4 Grid West Project Consultation No. 3

5th March to the 16th April 2013

The publication of maps with potential corridors resulted in a significant increase in awareness of the project and a rise in engagement. As a result the focus of conversation tended to move onto the potential routes.

Although there was a higher level of awareness at this stage, there were some stakeholders that had not heard about the project before and had not seen or heard of the advertisements in the local press and on radio.

Many stakeholders appreciated the level of detailed information available at the open days and the opportunity to speak to the project team with various areas of expertise.

The majority of people who attended the open days were complimentary of how the open days were promoted and managed.

The roadmap 'storyboard' was well received by the members of the public in attendance at open days to demonstrate the process by which route corridors had been identified and the timeline for the project. The key message around the level of public consultation prior to submission for planning and the length of time devoted to each phase was recognised by many visitors.

A number of stakeholders were critical of the detail available in the maps available at open days and initially on the project website. It was a feature of the open days that people sought more detailed mapping and were primarily interested in seeing how the project affected their local area in detail.

On the issue of undergrounding, it was raised in a number of submissions. The approach of most stakeholders was to ask why the line could not be undergrounded, rather than a request for further studies or criticism of the level of consultation on underground.

Some stakeholders advised the project team that they did not receive the mail drop which took place in January 2013. Following extensive investigation the team identified two postal zones in the area of Ballaghaderreen and Castlerea that had been missed by the mail provider.

A small number of stakeholders claimed that answers given at the latest set of open days were not consistent with answers previously given by EirGrid.

This period saw the emergence of members of the public who expressed open opposition to the project, initially at an individual level and then gradually in organised groups. One couple who engaged directly with the team was critical of EirGrid's failure to give convincing answers to specific health concerns (e.g. corona noise).

It also saw an emergence of elected representatives expressing opposition. This was reflected in a marked increase in submissions to the project. The themes of many submissions were common —concern about health, visual impact, property devaluation and noise.

In some cases, e.g. Kilmovee, approximately 130 identical submissions were received seeking the line not to be routed in their area. In other individual letters there were core paragraphs that contained identical content. In the case of Killasser, a petition was signed by over 100 local residents and submitted querying the constraints analysis undertaken.

Typically these submissions did not comment on the consultation process and in fact there were very little comments or queries raised in relation to the public consultation process specifically. Some public representatives argued that the use of the Strategic Infrastructure Board was a circumvention of the normal planning process and was denying local councillors and local people a say in the development of the project.

1.2.5 Grid West Project Consultation No. 4

7th October - 25th October 2013

By this stage the national debate surrounding grid infrastructure across Ireland had increased and the level of awareness of the project had risen further. As a consequence, public engagement with the consultation process increased.

A large protest took place at four of the five open days of this stage. The focus of opponents was very much on the reasons for their opposition to the overhead line for many reasons, rather than the consultation process.

Changes to the Least Constrained Corridor were made and the project team delivered a personal letter to all householders within the new Emerging Preferred Route Corridor. . Some stakeholders within the new corridor felt that they had not been consulted properly on the change. They had "disengaged" when they thought they were nearby but not in the Least Constrained Corridor, and were surprised to find a change had occurred.

One elected representative charged that changes to the Least Constrained Corridor had been made on the basis of political interference and not proper consultation.

Prior to the series of open days, a large number of opponents of the project came to a briefing initially arranged for public representatives. Many stakeholders at that meeting expressed criticism of EirGrid's consultation process.

They expressed the view that EirGrid was not engaged in genuine consultation because it had ignored their submissions which raised concerns about health issues.

Some stakeholders asserted that EirGrid was not genuine in its consultation because it had ignored those who opposed the project on grounds of health, property devaluation, visual impact etc.

Typically the issue of undergrounding arose from stakeholders asking why the line could not be undergrounded, rather than a request for further studies or criticism of the level of consultation on underground.

Many stakeholders said that they were not happy with EirGrid's response on the risk of property devaluation. Some stakeholders complained that EirGrid's written responses to submissions were "template" and had not adequately responded to their concerns on health etc.

At one open day, a group opposing the project asked that the event be turned into a public meeting. When this request was refused, they held an impromptu public meeting within the function room.

Public meetings which EirGrid did not attend mobilised opposition. Criticism of EirGrid for not attending public meetings was voiced very often by stakeholders.

When it was explained to one elected representative that public meetings did not work for EirGrid, he responded "they work for me".

Notwithstanding their opposition, many of the people who attended the open days were complimentary of how the open days were promoted and managed. However some stakeholders expressed concern that they had not heard about the project before and this was the first time that they had the opportunity to provide feedback. Many requested to be kept up to date on the project through various channels of communication and supplied their contact details.

It was not untypical for an encounter with an opponent at an open day to end with the stakeholder acknowledging the quality and accessibility of the information provided by EirGrid but nonetheless less repeating their opposition based on EMF, devaluation and visual impact.

There was notably less submissions following the announcement of the emerging preferred route corridor than the Stage One Report.

Increasingly EirGrid was being described in derogatory terms and references to the level of consultation which had occurred since the launch of the project were summarily dismissed.

5.3 Feedback from North South Interconnector Project Consultation Process

Following the withdrawal of an original planning application for the North South 400kV Interconnection Development in July 2010, consultation on a new application began in May 2011 with the launch of a Preliminary Re-Evaluation Report.

In April 2013, EirGrid published a Final Re-evaluation Report, which provided a comprehensive overview of the project - which was subject to a six-week period of public consultation. This feedback was considered by the project team and formed part of a Preferred Project Solution Report published two months later. This report documented the line design process and provided detailed information on the line route. There was then an eight-week period of public consultation.

The greatest criticism of the consultation carried out on the North South 400kV Interconnection Development was that participants believed the consultation was not meaningful. This was because they believed that EirGrid was totally focused on an overhead solution and was ignoring potential underground alternatives. While there was recognition of the consultation opportunities, stakeholders expressed the opinion that EirGrid did not listen to the views of the public when consulting with the community.

A number of stakeholders provided feedback relating to community gain during the consultation on the preferred project solution. This feedback predominantly related to enquiries on the principle of community gain, as well as suggestions and feedback on who should receive community gain, and who should manage any such fund.

It was felt by some stakeholders that the project is not in compliance with the Aarhus Convention. Some participants were of the view that the consultation was not meaningful and that it was simply a public relations exercise. A number of stakeholders expressed the opinion that EirGrid does not listen to the views and feedback of the people.

Monaghan Anti-Pylon Group considered that its facilitation of additional events in County Monaghan in May 2013, attended by over 500 people, would not have taken place had it known that the events were for the purposes of public engagement and not public consultation.

Monaghan Anti-Pylon considered EirGrid did not take on board the significant volume of concerns and feedback raised at the events. Having subsequently met with their members, it was stated that landowners had expressed disappointment regarding the events held in May 2013 and were unanimously of the opinion that any further consultation regarding pylon locations would be futile.

Many stakeholders who contacted the phone line and/or the open day events advised that EirGrid does not listen to the concern of the public citing that if EirGrid had done so, the project would be underground and would have been built by now.

Some stakeholders expressed concern about where the group NEPP obtain their information and felt that it was important to hear both sides of the argument. They explained that this was why they had attended the open day.

Some submissions requested information on what national consultation process has taken place to allow the proposal to be considered.

Some participants suggested that local parish bulletins should be used to advertise information on the open days while others commented that the Community Update Brochure did not provide information about the health issues of the project.

With reference to communication and engagement with landowners, many submissions were received which enquired as to how landowners were being contacted and whether they were providing access to EirGrid for surveys. Some stakeholders questioned why EirGrid had produced brochures for landowners but not for residents.

Some stakeholders considered that the mapping displayed and/or provided for the project gave the perception that the line was further away.

Some members of the public attended the open days as they had heard about the project on the radio and wanted to find out more about the project and what EirGrid does.

Some submissions expressed the view that it is pointless to talk to EirGrid and that EirGrid does not listen to people who have said all along that they want the project to be located underground.

A submission was received which considered that all publications relating to the development should be made publicly available in the Irish language and requested that all information made available henceforth by EirGrid, be it information published online, publicly or on the internet, be made available in Irish.

Submissions were received in relation to the locations of the information centres with some submissions questioning why the information centres had closed in September.

Concerns were raised by stakeholders in County Cavan during the consultation on the Final Re- evaluation Report (23 April and 24 April 2013) in relation to the location of the open day in Cavan, which had been held at the Town Hall in Cavan Town. Stakeholders considered that the event should have been held closer to the proposed line route.

In response to this, EirGrid sourced an alternative venue in Kingscourt in which a further open day event for the consultation on the Preferred Project Solution Report was held. This venue was located on the Main Street of Kingscourt in close proximity to shopping and community amenities with ample car parking available.

A number of stakeholders provided feedback relating to community gain during the consultation on the preferred project solution. This feedback predominantly related to enquiries on the principle of community gain, as well as suggestions and feedback on who should receive community gain, and who should manage any such fund.

5.4 Summary of criticism raised in the Oireachtas

During November and December 2013, there were three meetings of the Oireachtas Joint Committee on Transport and Communications with regard EirGrid.

- Firstly, on November 20th there was a meeting with regional anti-pylon community groups. A number of groups presented to the committee and references were made to EirGrid's consultation process. Questions and answers by TD and Senators followed with additional criticisms of the consultation process.
- On December 3rd there was a discussion with the then chairman designate John
 O'Connor to discuss his appointment as chairman to EirGrid board. Over the course
 of this meeting, TDs and Senators expressed criticisms regarding the consultation
 carried our in their constituencies.
- On December 4th Fintan Slye, chief executive, was asked to discuss EirGrid's work
 programme; the impact the construction of overhead power lines is having on or will
 have on communities; and the economics of the energy market in general. Much of
 the questions from TDs and Senators centered on criticisms of EirGrid's consultation.

In addition these meetings, on December 3rd there was a private members motion brought forward in the Dáil by Fianna Fail TD Michael Moynihan that called for an independent international assessment of EirGrid's proposals.

In summary, criticism of EirGrid's public consultation activities on its large grid projects was a common theme throughout the four separate sessions.

The criticisms that were raised over the course of the four meetings in Leinster House generally reflected the issues conveyed to EirGrid which are covered in the early sections.

Broadly speaking, deputies and opposition group accused EirGrid of being disingenuous in its dealings with the public. Criticisms also included claims that consultation activities were "tick box" exercises; failed to address the issues of concern to the public; failed to adequately consider the issue of an undergrounding option to bury power lines.

Some additional points were made with regard to the issue of undergrounding in so far as there was a need for a national policy, like in other countries, with regard to a preference to underground transmission power lines. Without this EirGrid's consultation process would remain flawed. Another point expressed by some was that communities affected by the North South

Interconnector project did not get the early consultation process that the Grid West and Grid Link projects have been afforded.

5.5 Note on media criticisms of EirGrid Consultation Process

The concerns of members of the public about the public consultation were reflected in media coverage of the project, primarily in local media but also featuring in national media also.

These concerns are reflected in the consultation feedback summary.

The key criticisms reported by the media tended to reflect feedback made directly to EirGrid or conveyed during the course of public and Oireachtas meetings.

The main topics on consultation that featured in the media can be summarised as follows:

- 1) Insufficient consultation on an underground option. The main criticism was that EirGrid had ruled out such an option early on in the project development process. Therefore, meaningful consultation with communities could not take place it was claimed.
- 2) Some members of the press criticised EirGrid for failing to provide a cost/benefit analysis specifically for Grid25 and specific projects. Media reports expressed the view that there was a lack of detailed information in relation to the project cost and its benefits for society.
- 3) There have been some references to criticism of EirGrid for not attending public meetings, the failure of An Post to deliver letters to some areas of the Grid West project and EirGrid seeking to bypass local authorities by utilising the strategic infrastructure board.
- 4) Some commentators cited a failure to communicate the need for grid projects in the current economic climate in the context of the on-going debate on Ireland's renewable energy policy and concern about the increase in wind farms.
- 5) There was criticism of what some commentators described as a 'divide and conquer' strategy referring to the process of publishing many route corridor options. Some commentators accused EirGrid of presenting the image of a significant consultation process while dividing communities and pitting them against each other.
- 6) Some columnists expressed the view that EirGrid had failed during its consultation to reassure communities in relation to health concerns stating that more needs to be done to convince communities that the infrastructure is safe.
- 7) There was criticism by the local media in Waterford that local newspapers in Dungarvan were not used to advertise Consultations No.1 & No. 2 for the Grid Link project. There was also some criticism that a project information centre was not opened in Co. Waterford.

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