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PLANNING

GRID IMPLEMENTATION PLAN 2023-2028 FOR THE ELECTRICITY TRANSMISSION SYSTEM IN IRELAND

Strategic Environmental Assessment Statement

Prepared for:

EirGrid



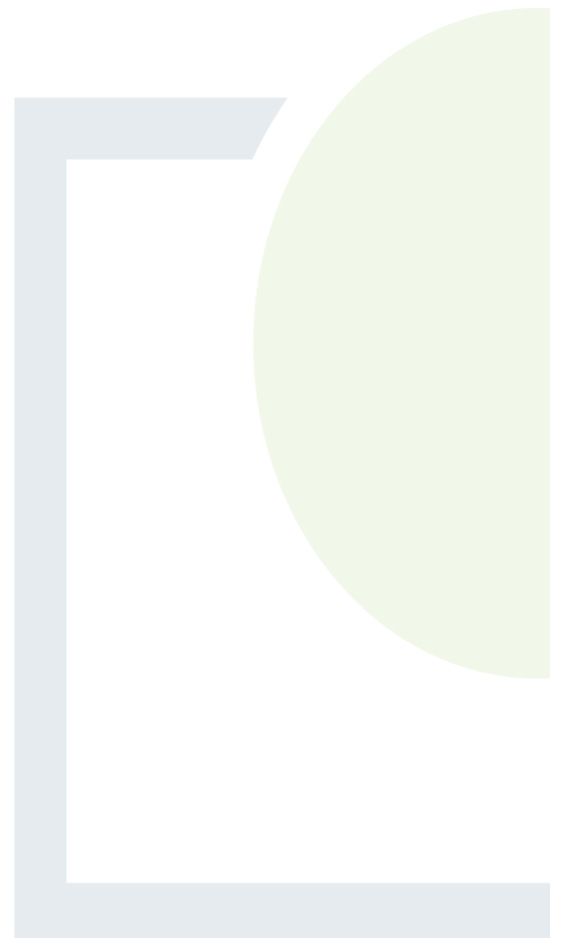
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Strategic Environmental Assessment Statement

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Abstract: Fehily Timoney and Company is pleased to submit this Strategic Environmental Assessment Statement for the Grid Implementation Plan 2023-2028 for the electricity transmission system in Ireland to EirGrid for publication alongside the Plan. This Statement provided information on the decision in accordance with Article 16 of S.I. No. 435/2004 - European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (as amended).

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1. INTRODUCTION

1.1 Background

EirGrid have adopted the Grid Implementation Plan (Grid IP) 2023 - 2028. This is the Strategic Environmental Assessment (SEA) Statement for the Grid IP. This SEA Statement provides information on the following:

1. How Environmental Considerations were integrated into the Grid IP.
2. How the SEA Environmental Report and consultation submissions and observations on it have been taken into account during the preparation of the Grid IP
3. The reasons for choosing the Grid IP as adopted, in the light of the other reasonable alternatives considered.
4. The measures decided concerning monitoring the significant environmental effects of implementation of the Grid IP.

The EPA in their Guidance on Strategic Environmental Assessment (SEA) Statements and Monitoring (2023) succinctly summarize the role SEA Statement have under the SEA process, as follows: *'SEA Statements have the potential to play a central role in summarising the effectiveness of the SEA process. They can capture how environmental considerations have shaped the plan/programme (e.g., through policy wordings, revisited zonings and other measures) and how the process has contributed to making the plan or programme more sustainable'*.

1.2 Legislative Context

SEA is required under the EU Council Directive 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment (the SEA Directive)¹. The SEA Directive requires that an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.

The overarching objective of the SEA Directive is *'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans....with a view to promoting sustainable development'*²

SEA is described within the Department of the Environment, Community and Local Government's (2004) Guidelines for Regional Authorities and Planning Authorities on the Implementation of SEA Directive (2001/42/EC) as the *'formal systematic evaluation of the likely significant environmental effects of implementing a plan or programme before a decision is made to adopt the plan or programme'*.

¹ Transposing Irish Regulations: S.I. No. 435 of 2004 (European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004, as amended by S.I. No. 200 of 2011 (European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011). S.I. No. 436 of 2004 (Planning and Development (Strategic Environmental Assessment) Regulations 2004, as amended by S.I. No. 201 of 2011 (Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011).

² Implementation of SEA Directive (2001/42/EC): Assessment of the Effects of Certain Plans and Programmes on the Environment – Guidelines for Regional Authorities and Planning Authorities (Department of the Environment, Community and Local Government, 2004)



Article 16 of S.I. No. 435/2004 - European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (as amended) requires that a competent authority provide information on the decision to approve a Plan that has been subject to SEA. Article 16(2)(b) requires that a statement is produced summarized, inter alia, how environmental considerations have been integrated into the plan or programme subject to SEA.

In accordance with the overall aim of the SEA Directive as set out in Article 1, an SEA of the Grid IP is required to:

“Provide for a high level of protection to the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development....”

Under Article 2 an environmental assessment:

“...shall be carried out for all plans and programmes, (a) which are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use and which set the framework for future development consent of projects listed in Annexes I and II to Directive 85/337/EEC4.”

The SEA process is undertaken in four stages. Stage 1 Screening (to determine whether SEA is required, or not) and Stage 2 Scoping (establishing the spatial and temporal scope of the SEA and a decision-making framework that can be used to evaluate impacts) have been completed for the Grid IP, with the outputs of both stages, the SEA Screening Statement (this report) and the SEA Scoping Report, available on the EirGrid website (www.EirGridgroup.com).



2. HOW ENVIRONMENTAL CONSIDERATIONS WERE INTEGRATED INTO GRID IMPLEMENTATION PLAN 2023-2028

2.1 SEA Scoping

The first stage of the SEA process was to carry out SEA Screening to determine the requirement for SEA of the Grid IP. It was determined the Grid IP was a statutory Plan and had the potential to give rise to likely significant environmental effects and therefore SEA is required for the Plan.

The second stage of the SEA process was carrying out SEA Scoping. The purpose of SEA Scoping is to establish the spatial and temporal scope of the SEA and a decision-making framework that can be used to evaluate impacts of the Grid IP. A SEA Scoping Report was produced to document the scoping process. The SEA Scoping Report outlined information on the emerging Grid IP, including the need for the Grid IP, its temporal and geographical area and overall objectives. It facilitated scoping the Environmental Components and understanding the environmental issues to be considered under the SEA process.

A copy of this report was made available to the statutory Environmental Authorities. Environmental Authorities made scoping submissions on the SEA Scoping Report. The SEA Scoping Report was finalized in light of these submissions. The SEA Scoping Report, along with SEA scoping consultation submissions and consideration of these submissions by the SEA process, helped communicate and define the scope of the environmental issues which are to be dealt with by the SEA, the methods which will be used to address these issues, and the level of detail required to address these issues, as per the SEA Guidelines³.

2.2 Environmental Assessment and Mitigation

Taking into account the scope detailed in the SEA Scoping Report which was produced for the initial draft version on the Grid IP, the environmental effects associated with the implementation of the Grid IP were identified, evaluated and described in a SEA Environmental Report.

This report defined mitigation measures to prevent adverse environmental effects due to the implementation of the Grid IP. The following forms of mitigation have been adopted to ameliorate the negative environments of the Grid IP and maximize potential positive effects of the plan:

- Mitigation through consideration of alternatives.
- Mitigation through integration of environmental considerations into the Grid IP.

2.2.1 Mitigation through consideration of alternatives

A number of alternatives were considered at an early stage in the process. The environmental effects of these alternatives were evaluated during the SEA process. Detail on how Plan alternatives and their environmental effects were considered during plan-making is provided in Section 3.

³ Implementation of SEA Directive (2001/42/EC): Assessment of the Effects of Certain Plans and Programmes on the Environment Guidelines for Regional Authorities and Planning Authorities (DEHLG, 2004), Page 18: "It is recommended that at the end of the scoping procedure, the plan-making authority should prepare a brief scoping report of its conclusions as to what information is to be included in the environmental report, taking account of any recommendations from the environmental authorities."



2.2.2 Mitigation through integration of environmental considerations into the Grid IP

The plan making process was carried out in parallel with the SEA and AA processes. Regular communication and interaction took place between the environmental assessment team and the plan making team. Environmental considerations that came to light during the SEA and AA processes, including consultation processes, were regularly communicated to the plan making team during the plan making process. As necessary, environmental mitigation measures to ameliorate the potential negative environmental effects of implementing the Grid IP were developed and then integrated into the Grid IP. Much of the environmental mitigation was embedded in the plan early on in the process as a result of this. This process was carried out in an iterative manner to ensure optimal plan making and environmental outcomes. Environmental considerations were also integrated into the plan so as to facilitate maximizing identified positive environmental effects of the Grid IP.

Mitigation measures were suggested that maximize the co-benefits of climate action for other environmental components such local air quality, human health, biodiversity, water quality and other interrelated areas (i.e., win-win solutions).

Additional text clarifying environmental protection related obligations and environmental enhancement opportunities has been attached to a variety of defined actions in the plan. This text has been shaped to ensure that environmental considerations are appropriately taken into account during plan implementation. This text has also been shaped to ensure plan implementation generates the minimum level of negative environmental effects and the maximum level of positive environmental effects. Examples of these text additions are presented in Table 2-1. All relevant policies and objectives that are viewed as mitigation measures for the purposes of the assessment can be seen in Table 2-2 and Table 2-3.

These environmental mitigation measures were integrated into the Grid IP and will prevent negative effects and maximize positive effects associated with the Grid IP.



Table 2-1: Proposed Environmental Mitigation Measures - Examples of Additional text included in Plan policies and objectives relating to environmental protection related obligations and environmental enhancement opportunities

Recommendation	Code	Policy or Objective
Amended Text	ENVP11	To avoid or minimise impacts on surface, ground, and marine water quality and support achieving objectives of the Marine Strategy Framework Directive and Water Framework Directive.
Policy Added	ENVP13	To protect the water environment, water quality and aquatic ecology in accordance with the EU Water Framework Directive, in the development of its transmission projects.
Policy Added	ENVP14	To contribute, as appropriate, to the protection of existing and potential water resources, and their use by humans and wildlife, including rivers, streams, wetlands, groundwater, coastal waters and associated habitats and species in accordance with the requirements and guidance in the EU Water Framework Directive 2000 (2000/60/EC), the European Union (Water Policy) Regulations 2003 (as amended), the European Communities Environmental Objectives (Surface Waters) Regulations 2009 (SI No. 272 of 2009), the Groundwater Directive 2006/118/EC and the European Communities Environmental Objectives (groundwater) Regulations, 2010 (S.I. No. 9 of 2010) and other relevant EU Directives, including associated national legislation and policy guidance (including any superseding versions of same).
Policy Added	ENVP15	To support the application and implementation of a catchment planning and management approach to development and conservation, including the implementation of Sustainable Drainage System techniques for new development.
Policy Added	ENVP16	To develop a robust and evidence-based methodology, leveraging Geographic Information technology to quantify losses of rural field boundaries on grid projects, having regard for updates to Environmental Impact Assessment legislation
Policy Added	ENVP17	Risk assess the potential to plant certain shallower-rooted woody species over High Voltage Underground Cables, informed by engagement with the ESB, and other Transmission System Operators, and through use of technological innovations to identify root extents.
Policy Added	ENVP18	To cooperate and knowledge share with government departments and other state bodies, to advance the preparation and implementation of government legislation and policy onshore and offshore, including on matters of renewable energy and associated grid development
Amended Text	BIODP2	To avoid or where unavoidable minimise the impact of grid development on existing trees and hedgerows, and all semi-natural habitats



Recomendation	Code	Policy or Objective
Amended Text	BIODP4	To design habitat creation, restoration and enhancement into project scopes wherever possible (except where constrained by external factors outside EirGrid’s control such as third party land ownership on linear infrastructure), in collaboration with ESB for onshore assets, while complying with relevant technical and safety standards.
Policy Added	BIODP4	To optimize use of the existing 6 Step framework for Grid Development for biodiversity protection and restoration, through use of best available field and desktop data including the Tailte Eireann National Land Cover and remotely sensed data to avoid sensitive features in the identification of the study area and technology (step 3), the identification of route options (Step 4), and development of the preferred route (Step 5).
Policy Added	BIODP6	To integrate into offshore grid projects risk-assessed Nature Inclusive Design measures with proven ecological performance. The performance of such measures will be monitored to inform adaptive management, and the results of this monitoring and details of any corrective actions will be openly shared to advance the common understanding of marine NID.
Policy Added	BIODP7	To share high quality biodiversity and other environmental data collected on EirGrid projects onshore and offshore, in support of the National Biodiversity Plan 2023-2030 and Irish government Open Data Strategy 2023-2027, and ensure this is readily accessible through the National Biodiversity Data Centre and open source portals (including the Irish Government data.gov.ie portal). EirGrid will also seek to make EirGrid’s open data purposeful, by engaging with relevant third parties in public authorities, academia, and industry to inform them of the scope of and any limitations to datasets.
Policy Added	BIODP8	To develop and implement marine biodiversity policy as Eirgrid develops offshore grid projects, to include considerations for Marine Protected Areas, Marine Nature Inclusive Design, monitoring of mitigation effectiveness, and providing open access to high quality environmental data, in line with European and national legislation and policy
Policy Added	CULTP3	To engage at an early stage, and iteratively, with local authority experts, and the National Monuments Service to identify the relevant scope of archaeological assessments and method statements on all grid projects onshore and offshore
Policy Added	PDP4	In selecting the proposed location or route of a new project, EirGrid will identify and explore all reasonable alternatives to identify the optimal solution/Best Performing Option. The selection of the location or route will be determined following a multi-criteria assessment of technical, economic, environmental, socio-economics, and deliverability, and will be publicly consulted upon.



Recommendation	Code	Policy or Objective
Policy Added	PDP5	To seek opportunities to co-locate grid projects with existing and proposed linear infrastructure where appropriate (e.g. greenways, blueways, utilities) in collaboration with other state authorities and other parties to minimise cost and environmental impacts when delivering grid projects.
Amended Text	PCP1	To comply with relevant legislation and have regard for relevant guidelines in planning and consenting of grid development projects and make provision for any policies for the provision of grid development set out in these documents. In particular, to have regard to the National Spatial Strategy, National Planning Framework, National Marine Planning Framework, Offshore Renewable Energy Development Plans, Regional Planning Guidelines, and Regional Spatial and Economic Strategies.
Policy Added	PCP5	To fulfil EirGrid’s role in the implementation of European legislation, policy and guidance on Accelerated permitting for renewables and associated grid infrastructure, onshore and offshore, having regard for environmental protections and eligibility criteria.
Amended Text	CEP1	To consult and engage on grid developments with statutory and non-statutory stakeholders, including communities, landowners, fishers, aquaculture operators, and the general public, at the earliest meaningful stage of a project’s development. Consultation will be transboundary where relevant, to include governments, statutory nature conservation bodies, and other agencies, including The Northern Ireland Environment Agency for cross-border matters
Amended Text	CEP2	To recognise and develop the essential role that communities, landowners, fishers and aquaculture operators and other stakeholders play in grid development, and to engage with different stakeholders as appropriate at all stages of a grid development project, and in plan-making.
Policy Added	HBS06	To assess and mitigate wherever possible the potential impact upon fisheries and aquaculture in the development of grid development projects particularly in areas of economic importance to the seafood sector
Amended Text	ENVO8:	To continually improve the effectiveness of project level mitigations, and fill knowledge gaps, by reviewing project-level environmental monitoring reports, and identifying any instances of mitigation failure, to inform remedial actions and/or revisions to future mitigation specifications
Amended Text	ENVO10:	To establish and maintain a Geographic Information System of existing and proposed EirGrid grid development projects onshore and offshore, to assist with the identification of cumulative and transboundary impacts, increase geospatial resources, and deepen application of GI technologies to optimise delivery of EirGrids functions, and environmental objectives generally



Recomendation	Code	Policy or Objective
Policy Added	ENV011:	<p>To insert in project environmental assessments for onshore and offshore projects, new requirements for Contractors to provide written environmental monitoring reports to the EirGrid Planning and Environmental Unit, in addition to any prescribed bodies.</p> <p>This will increase the flow of information between project and plan level assessments, to ensure mitigation efficacy is understood, and mitigation specifications are continually improved</p>
Amended Text	ENV012:	<p>To ensure that site selection and design of new overground infrastructure onshore and offshore considers views from existing purpose-built tourism facilities, as well as views from touring routes, walking trails, scenic viewing points, blueways, and greenways</p>
Policy Added	ENV013	<p>To identify the nature of fisheries and aquaculture in a project area; to consider the cumulative / in combination impact on fisheries and aquaculture of a project and to consider short term and long-term impacts of grid development projects on fisheries and aquaculture</p>
Policy Added	ENV014	<p>To consider the potential impact upon tourism in the development planning of transmission projects, and to protect tourism resources through the appropriate and sustainable planning and design of transmission infrastructure development</p>
Policy Added	ENV015	<p>To integrate Grid IP policies into lower-tier plans and programmes, and projects (so-called ‘tiering’ or transfer of mitigation from higher to lower levels), and monitor, report, and continually improve effectiveness of implementation via the SEA monitoring process .</p>
Policy Added	BIODO2	<p>Having regard to BIOD01, and applying the mitigation hierarchy, deliver No Net Loss of biodiversity, if not Net Biodiversity Gain, on all EirGrid projects (onshore and offshore), except where external factors beyond EirGrid control constrain this objective (e.g. third party land ownership on linear infrastructure). As a last resort in such cases where external factors constrain delivery of NNL or NBG, EirGrid will consider off-site habitat compensation. Such off-site compensation may be delivered by third party suppliers (e.g. not-for-profits) on third party lands, or on ESNB-owned lands, or (if and when established through appropriate governance) on lands acquired by EirGrid for biodiversity compensation.</p> <p>Where EirGrid concludes NNL or NBG has been achieved, this conclusion will be underpinned by objective, and scientifically rigorous data. The approach may involve use of a biodiversity metric or tool and qualitative assessment, but will have regard for, and keep step with guidance from Irish government, the Chartered Institute of Ecology Management, or other authoritative sources.</p>



Recomendation	Code	Policy or Objective
Amended Text	BIODO3	To continue the retrofitting of bird flight diverters on existing overhead lines (where the opportunity arises during line repairs), seek to establish a citizen science reporting portal for bird strikes to better understand likely high risk lines to birds, and collaborate with ESBN, eNGOs, and research institutes to continually review and improve the effectiveness of bird flight diverters
Policy Added	CLIM03	To develop site-specific measures to protect critical grid infrastructure from the effects of climate change
Policy Added	CULT02	To review and update EirGrid's 2009 Code of Practice, to include offshore archaeological features in consultation with relevant experts in the Department of Housing, Local Government and Heritage.

Table 2-2: All Environmental Mitigation Measures in the Plan policies relating to environmental protection

Environmental component	Code	Policy
Various	ENVP1	To uphold best environmental practice in the design and appraisal of onshore and offshore grid development, considering impacts onshore, offshore, cumulatively and across state boundaries where relevant.
Various	ENVP2	To continually improve EirGrid's approach to the protection of the onshore and marine environment from development impacts, by applying the findings from monitoring at plan and project level to improve existing processes and fund and resource new processes where required
Various	TP1	To promote and facilitate the sustainable development of a high-quality transmission grid to serve the existing and future needs of the country, in accordance with EirGrid's Grid Development Strategy, and the Shaping Our Electricity Future Transmission Network Analysis
Various	TP2	To consider all practical technology options in the development of its projects, including maximising use of the existing grid.
Various	TP3	To continue to be proactive in the development of emerging or innovative technical solutions for the development of the transmission grid.
Various	PDP1	To adhere to, and regularly review EirGrid's approach to developing the grid, and any associated guidelines, consenting precedents, policies and processes, to ensure the structured, consistent development of all its grid development projects.
Various	PDP2	To promote sustainable grid development by balancing complex and/or competing technical, economic, environmental, social and deliverability goals and priorities in decision-making.



Environmental component	Code	Policy
Various	PDP3	To continue to build staffing capacity to adequately resource onshore and offshore grid development and operation, across engineering, environmental, project management, administrative, legal and human resources
Various	PCP2	To have regard to precedent arising from decisions of the Competent Authorities, and of the High Court in Judicial Review of decisions, relating to the planning and consenting of grid development projects.
Various	PCP3	To promote sustainable grid development by balancing complex and/or competing technical, economic and environmental goals and priorities in decision-making.
Various	PCP4	To prepare and/or update internal policies and processes related to the planning and consenting of grid development projects, including the existing internal process for Screening of Exempted Development, and Screening for Appropriate Assessment
Various	CEP3	To ensure consultation and engagement feedback is appropriately considered in decision making.
Various	CEP4	To facilitate formal complaints and to resolve such complaints in a timely manner.
Various	HBSO4	To promote and deliver EirGrids Community Benefit Policy and Proximity Payments for certain categories of grid development projects, in accordance with established terms of reference.
Population and Human Health	HBSP01	To consider and address social impact and the impact on human beings in the development of grid development projects as appropriate.
Population and Human Health	HBSO2	To examine the social impact of grid developments on the receiving environment as appropriate and in accordance with EirGrid's methodology for Social Impact Assessment.
Population and Human Health	HBSO3	To ensure that all grid development projects are screened for the requirement for a Social Impact Assessment, and where so required, that such Assessment will accompany an application for statutory consent.
Biodiversity, Flora and Fauna	ENVP12	To deliver projects while ensuring natural resources in coastal and marine waters are exploited in a sustainable manner so that biodiversity is maintained or achieved and that European regional seas are clean, healthy and productive
Biodiversity, Flora and Fauna	BIODP1	To protect flora, fauna and habitats, and sites designated in the Habitats Directive, the Birds Directive, the Wildlife Act 1976 (as amended), the Flora Protection Order (S.I. no. 235 of 2022), and the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended)



Environmental component	Code	Policy
Biodiversity, Flora and Fauna	BIODP3	To protect and wherever possible enhance wooded, wetland and other habitats which function as wildlife corridors, in accordance with Article 10 of the EU Habitats Directive
Landscape, Seascape & Visual Amenity	ENVP9	To have regard to the objectives of the National Landscape Strategy and the Regional Seascape Character Assessment in onshore and offshore grid development projects, to protect landscapes and seascapes from grid development.
Cultural Heritage - Archaeology & Architectural	CULTP1	To conserve and protect designated and undesignated architectural assets and their settings (onshore) and archaeological heritage (onshore and offshore)
Cultural Heritage - Archaeology & Architectural	CULTP2	To protect known and unknown (potential) archaeological material in grid development, by avoidance, best practice mitigation measures, and by process improvements identified from review of project level environmental monitoring reports
Air Quality & Noise	ENVP6	To seek to preserve and maintain air quality in accordance with good practice and relevant legislation in the construction of grid development projects onshore, and offshore
Air Quality & Noise	ENVP7	To facilitate new technologies which minimise noise emissions on onshore and offshore grid development
Air Quality & Noise	ENVP8	To seek to preserve and maintain noise quality (including underwater noise) in accordance with good practice and relevant legislation.
Air Quality & Noise	ENVP10	To ensure appropriate dust suppression during construction works.
Water	CLIMP3	That there is no increase in flood risk as a result of grid development, and to ensure any flood risk to the development is appropriately managed.
Water	ENVP4	To require the use of sustainable urban drainage systems in all new grid developments where appropriate.
Water	ENVP5	To have regard to the statutory guidelines on the Planning System and Flood Risk Management, as may be revised/updated when devising grid development projects, and in the preparation of grid development strategies and plans.
Tourism	HBS05	To assess and mitigate wherever possible the potential impact upon tourism in the development of grid development projects onshore and offshore, particularly on natural and unspoilt attractions with identified tourism potential.



Environmental component	Code	Policy
Climate Change	ENVP3	To apply a strategic / programmatic approach to onshore and offshore grid development to optimize environmental assessment and public engagement at a regional / landscape scale. Through programmatic approaches, reduce timescales and resources, and increase project delivery rate to achieve the 2030 targets of up to 80% electricity from renewable sources.
Climate Change	TP4	To effectively manage renewable surplus by utilising Demand Flexibility in order to promote renewable generation
Climate Change	TP5	To ensure EirGrid and ESB Networks develop and implement an end-to-end TSO/TAO joint approach to optimise delivery of onshore and offshore grid infrastructure projects.
Climate Change	CLIMP1	To integrate measures to address climate change into grid development, through effective mitigation and adaptation responses, in accordance with available guidance and best practice.
Climate Change	CLIMP2	To support, through all activities, and in particular connection of low-carbon and renewable energy generation onshore and offshore, delivery of the Government's target of up to 80% electricity consumption generated from renewable energy sources by the year 2030.
Climate Change	CLIMO1:	To assist towards meeting national and EU climate targets, in particular the Government's Climate Action Plan 2023 (and future plans). Specific to grid development, EirGrid will deliver it's obligations under the Governments Sectoral Climate Change Adaptation Plan (Electricity and Gas Networks) in grid development plans and projects.
Climate Change	CLIMO2:	To mitigate the impacts of climate change through policies and processes that reduce energy consumption and energy loss/wastage. EirGrid will meet committed targets to reduce Green House Gas Emissions under the international Science Based Targets initiative, towards which progress will be reported publicly
Climate Change	CLIMP3	That there is no increase in flood risk as a result of grid development, and to ensure any flood risk to the development is appropriately managed.
Transboundary Effects	TP6	To promote Security of Supply in order to maximise access to generation and promote future interconnections with neighbouring countries



Table 2-3: All Environmental Mitigation Measures in the Plan objectives relating to environmental protection

Environmental component	Code	Objectives
Various	ENVO1	To ensure that grid development projects onshore and offshore follow standard approaches to environmental assessment of grid development projects including EirGrid topic specific guidelines on Electromagnetic Fields (EMF), Cultural Heritage, and Ecology and international best practice
Various	ENVO2	To continue to prepare and/or update EirGrid evidence-based environmental guidelines, to integrate updated evidence or assess new types of development including offshore
Various	ENVO3	To develop the environment space on the EirGrid website as a tool for sharing information on EirGrid's impacts on and actions for the environment
Various	ENVO5	That all grid development proposals, and in particular, transmission substation developments, shall carry out, to an appropriate level of detail, a site-specific Flood Risk Assessment that shall demonstrate compliance with all current Guidelines, standards and best practice. The Flood Risk Assessment shall pay particular emphasis to residual flood risks, site-specific mitigation measures, flood-resilient design and construction, and any necessary management measures.
Various	ENVO6	To identify the nature of tourism in a project area; to consider the cumulative / in combination impact on tourism of a project and to consider short term and long term impacts of grid development projects on tourism as appropriate.
Various	ENVO7	That development of new transmission substations will not occur on sites which are below estimated flood levels for CFRAM Zone A or Zone B, without the relevant justification test
Various	ENVO9:	To continually improve the effectiveness of plan level mitigations, and fill knowledge gaps, by regularly (where possibly annually) publishing SEA-related monitoring reports, and implementing recommendations for process improvements
Biodiversity, Flora & Fauna	BIODO1:	That any grid development project, either individually or in combination with other projects, that has the potential to give rise to significant effect on the integrity of any European (Natura) site(s) shall be subject to Appropriate Assessment (AA) in accordance with Article 6 of the EU Habitats Directive.
Biodiversity, Flora & Fauna	BIODO3	To continue the retrofitting of bird flight diverters on existing overhead lines (where the opportunity arises during line repairs), seek to establish a citizen science reporting portal for bird strikes to better understand likely high risk lines to birds, and collaborate with ESNB, eNGOs, and research institutes to continually review and improve the effectiveness of bird flight diverters



Environmental component	Code	Objectives
Biodiversity, Flora & Fauna	BIODO4	To standardize the reporting of residual biodiversity impacts (after mitigation) at a geographic frame of reference, and report on trends in the course of SEA-related monitoring
Biodiversity, Flora & Fauna	BIODO5	To establish the submission of ecological records to the National Biodiversity Data Centre as Business-as-Usual, by imposing as a contractual requirement at planning and where relevant operational phases of grid developments onshore and offshore
Landscape, Seascape & Visual Amenity	ENVO4	To have regard to any future National Landscape and/or Seascape Character Assessment in the development of its grid development projects.
Cultural Heritage - Archaeology & Architectural	CULTO1	To obtain summary archaeological monitoring reports for grid developments onshore and offshore in collaboration with ESB (where relevant), and share summary findings from the Database of Irish Excavation Reports on the EirGrid webpage
Tourism & Recreation	ENVO6	To identify the nature of tourism in a project area; to consider the cumulative / in combination impact on tourism of a project and to consider short term and long term impacts of grid development projects on tourism as appropriate.
Tourism & Recreation	ENV012	To ensure that site selection and design of new overground infrastructure onshore and offshore considers views from existing purpose-built tourism facilities, as well as views from touring routes, walking trails, scenic viewing points, blueways, and greenways.
Tourism & Recreation	ENVO14	To consider the potential impact upon tourism in the development planning of transmission projects, and to protect tourism resources through the appropriate and sustainable planning and design of transmission infrastructure development..
Climate Change	CLIMO1:	To assist towards meeting national and EU climate targets, in particular the Government's Climate Action Plan 2023 (and future plans). Specific to grid development, EirGrid will deliver it's obligations under the Governments Sectoral Climate Change Adaptation Plan (Electricity and Gas Networks) in grid development plans and projects.
Climate Change	CLIMO2:	To mitigate the impacts of climate change through policies and processes that reduce energy consumption and energy loss/wastage. EirGrid will meet committed targets to reduce Green House Gas Emissions under the international Science Based Targets initiative, towards which progress will be reported publicly



2.3 Appropriate Assessment

The environmental assessment for the Plan undertaken was carried out in accordance with an Integrated Biodiversity Impact Assessment based methodology in accordance with EPA's guidance document entitled 'Final Report: Integrated Biodiversity Impact Assessment, Streamlining AA, SEA and EIA Processes. Best Practice Guidance.' (2012).

The methodology employed facilitated the integration of SEA and Appropriate Assessment (AA) processes relating to biodiversity impact assessment to ensure the effective and streamlined assessment of biodiversity impacts. The plan-making, SEA and AA processes - including scoping, baseline evaluation, impact assessment and mitigation/monitoring measure development processes - were carried out concurrently to facilitate holistic and complete assessment of biodiversity impacts. The effective communication and integration of scientific knowledge and analysis between assessments took place. The SEA was suitably informed by the analysis and conclusions in AA.

2.4 Consultation on SEA Environmental Report

A draft version of the SEA Environmental Report accompanied a draft version of the Grid IP on public display as part of the statutory public consultation required under Article 13 of S.I. No. 435/2004 - European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004. A draft version of the Natura Impact Report (NIR) produced under the AA process for the Draft Grid IP also accompanied the Draft Grid IP on public display. Environmental Authorities, relevant interested stakeholder and members of the public were notified of the Draft Grid IP being placed on display and the opportunity to make consultation submissions in relation to the Draft Grid IP. Members of public were made aware of the Draft Grid IP and associated environmental reports through a notification published by the local authority on its website. Environmental Authorities and interested stakeholders were notified through notification correspondence.

Various parties made consultation submissions and observations on the Draft Grid IP and associated environmental reports. Detail on submissions received relevant to SEA and AA issues and documentation, responses to these submissions, and any changes made to SEA Environmental Report (ER) and NIR documents on foot of these submissions. Updates were made to the SEA and AA documentation where relevant following on from receipt and consideration of the consultation submissions (Table 2-4).



Table 2-4: Responses to Consultation Submissions

Submission Text	Detailed response	Changes to NIR	Changes to SEA ER			
Bord Iascaigh Mhara						
<p>Having reviewed the documents, it is clear the Fisheries and aquaculture have not been adequately considered in SEA. Commercial Fisheries and Aquaculture are not addressed in the baseline assessment of land use, and thus have been excluded from appropriate consideration in the SEA process. This is of particular concern in the current Grid Implementation Plan 2023 – 2028 which has an increased focus on offshore infrastructure.</p> <p>To address this imbalance, we request that Fisheries and aquaculture be considered in</p> <ul style="list-style-type: none"> • 1.6 Baseline Information -Current State of the Environment & Future Trend • 1.7 Other Plans and Projects • 1.9 Assessment of the Draft Grid IP • 1.10 SEA Mitigation and Recommendations • 1.11 SEA Monitoring 	<p>The SEA process focuses on the potential sources for effects to the environmental and provides baseline data on a range of areas. Fisheries and aquaculture are considered throughout with respect to vessel movement, fish stock, ecological functioning to support the industries etc. The reports however, will be updated to clarify these considerations.</p>	<p>Clarification text – as detailed below.</p>	<p>Clarification text – as detailed below.</p>			
<p>We further request the following amendments to the recommendations relating to policies, objectives, and Monitoring programme.</p> <p>EirGrid Policies – SEA Recommendations</p> <table border="0" style="width: 100%;"> <tr> <td style="width: 10%; text-align: left;">Number</td> <td style="width: 60%; text-align: left;">Original</td> <td style="width: 30%; text-align: left;">Proposed Amendment</td> </tr> </table>	Number	Original	Proposed Amendment	<p>Specifying the NMPF in PCP1 and fishers, aquaculture operators as named stakeholders does not change the environmental outcome in any way. However, This will be added for clarity.</p>	<p>Amend for clarification PCP1, CEP1 and CEP2 as suggested.</p>	<p>Amend for clarification PCP1, CEP1 and CEP2 as suggested.</p>
Number	Original	Proposed Amendment				



Submission Text		Detailed response	Changes to NIR	Changes to SEA ER
PCP1	To comply with relevant legislation and have regard for relevant guidelines in planning and consenting of grid development projects and make provision for any policies for the provision of grid development set out in these documents. In particular, to have regard to the National Spatial Strategy, National Planning Framework, Offshore Renewable Energy Development Plans, Regional Planning Guidelines, and Regional Spatial and Economic Strategies.	To comply with relevant legislation and have regard for relevant guidelines in planning and consenting of grid development projects and make provision for any policies for the provision of grid development set out in these documents. In particular, to have regard to the National Spatial Strategy, National Planning Framework, National Marine Planning Framework, Offshore Renewable Energy Development Plans, Regional Planning Guidelines, and Regional Spatial and Economic Strategies.		
CEP1	To consult and engage on grid developments with statutory and non-statutory stakeholders, including communities, landowners, and the general public, at the earliest meaningful stage	To consult and engage on grid developments with statutory and non-statutory stakeholders, including communities, landowners, fishers, aquaculture operators, and the general public, at the earliest meaningful		



Submission Text		Detailed response	Changes to NIR	Changes to SEA ER
CEP2	<p>of a project's development.</p> <p>To recognise and develop the essential role that communities, landowners and other stakeholders play in grid development, and to engage with different stakeholders as appropriate at all stages of a grid development project, and in plan-making.</p>	<p>stage of a project's development.</p> <p>To recognise and develop the essential role that communities, landowners, fishers and aquaculture operators and other stakeholders play in grid development, and to engage with different stakeholders as appropriate at all stages of a grid development project, and in plan-making.</p>		



Submission Text	Detailed response	Changes to NIR	Changes to SEA ER										
<p>As the SEA has not adequately considered fishers and aquaculture operators, it would be appropriate to include the following recommendation. This recommendation is in line with that proposed in HBS05 for tourism.</p> <table border="1" data-bbox="168 794 940 1013"> <thead> <tr> <th>Number</th> <th>Original</th> <th>Proposed Amendment</th> </tr> </thead> <tbody> <tr> <td>HBS06</td> <td>To assess and mitigate wherever possible the potential impact upon fisheries and aquaculture in the development of grid development projects particularly in areas of economic importance to the seafood sector.</td> <td></td> </tr> </tbody> </table>	Number	Original	Proposed Amendment	HBS06	To assess and mitigate wherever possible the potential impact upon fisheries and aquaculture in the development of grid development projects particularly in areas of economic importance to the seafood sector.		<p>The SEA considered all sectors and provided robust measures such as the route selection corridor process. This policy includes consideration relating to the assessment and mitigation for fisheries and aquaculture.</p> <p>A note will be added for clarity. In addition, this policy will be included to further strengthen the Plan process in this regard.</p>	<p>Update BIODP6 to include note.</p> <p>Note: The route selection process will include considerations related to potential conflicts with sectors including but not limited to agriculture, tourism, transport, fisheries and aquaculture.</p> <p>In addition, the following this policy will be included to further strengthen the Plan:</p> <table border="1" data-bbox="1384 842 1691 1383"> <tbody> <tr> <td>HBS06</td> <td>To assess and mitigate wherever possible the potential impact upon fisheries and aquaculture in the development of grid development projects particularly in areas of economic</td> </tr> </tbody> </table>	HBS06	To assess and mitigate wherever possible the potential impact upon fisheries and aquaculture in the development of grid development projects particularly in areas of economic	<p>Update BIODP6 to include note.</p> <p>Note: The route selection process will include considerations related to potential conflicts with sectors including but not limited to agriculture, tourism, transport, fisheries and aquaculture.</p> <p>In addition, the following this policy will be included to further strengthen the Plan:</p> <table border="1" data-bbox="1756 842 2063 1383"> <tbody> <tr> <td>HBS06</td> <td>To assess and mitigate wherever possible the potential impact upon fisheries and aquaculture in the development of grid development projects particularly in areas of economic</td> </tr> </tbody> </table>	HBS06	To assess and mitigate wherever possible the potential impact upon fisheries and aquaculture in the development of grid development projects particularly in areas of economic
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Submission Text	Detailed response	Changes to NIR	Changes to SEA ER						
<p>Would again query the exclusion of Fisheries and aquaculture from the objectives particularly when tourism is included. For balance we request the addition of the following objective.</p> <table border="1"> <thead> <tr> <th data-bbox="170 818 264 842">Number</th> <th data-bbox="309 818 398 842">Original</th> <th data-bbox="506 818 763 842">Proposed Amendment</th> </tr> </thead> <tbody> <tr> <td data-bbox="170 868 264 892">ENV013</td> <td data-bbox="376 868 947 1066">To identify the nature of fisheries and aquaculture in a project area; to consider the cumulative / in combination impact on fisheries and aquaculture of a project and to consider short term and long-term impacts of grid development projects on fisheries and aquaculture as appropriate.</td> <td data-bbox="506 868 763 892"></td> </tr> </tbody> </table>	Number	Original	Proposed Amendment	ENV013	To identify the nature of fisheries and aquaculture in a project area; to consider the cumulative / in combination impact on fisheries and aquaculture of a project and to consider short term and long-term impacts of grid development projects on fisheries and aquaculture as appropriate.		<p>The SEA considered all sectors and provided robust measures such as the route selection corridor process. This policy includes consideration relating to the assessment and mitigation for fisheries and aquaculture.</p> <p>A note will be added for clarity. In addition, this policy will be included to further strengthen the Plan process in this regard.</p>	<p>importance to the seafood sector.</p> <p>Update BIODP6 to include note (as above).</p> <p>In addition, the following this policy will be included to further strengthen the Plan:</p> <p>ENV013 To identify the nature of fisheries and aquaculture in a project area; to consider the cumulative / in combination impact on fisheries and aquaculture of a project and to consider short term and long-term impacts of grid development projects on</p>	<p>importance to the seafood sector.</p> <p>Update BIODP6 to include note (as above).</p> <p>In addition, the following this policy will be included to further strengthen the Plan:</p> <p>ENV013 To identify the nature of fisheries and aquaculture in a project area; to consider the cumulative / in combination impact on fisheries and aquaculture of a project and to consider short term and long-term impacts of grid development projects on</p>
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Submission Text	Detailed response	Changes to NIR	Changes to SEA ER						
		fisheries and aquaculture as appropriate.	fisheries and aquaculture as appropriate.						
<p>Monitoring Programme</p> <p>In addition, we request the strengthening of the fisheries and aquaculture sections in the SEA monitoring programme.</p> <table border="1" data-bbox="168 718 952 1037"> <thead> <tr> <th>Number</th> <th>Original</th> <th>Proposed Amendment</th> </tr> </thead> <tbody> <tr> <td>PHH1_I4</td> <td>GIS analysis: No. inshore fishing sites intersected by marine transmission infrastructure (Specific Datasets TBC following consultation with Fisheries groups)</td> <td>GIS analysis: No. fishing and aquaculture sites intersected by marine transmission infrastructure (Specific Datasets TBC following consultation with BIM, Marine Institute and Fisheries groups)</td> </tr> </tbody> </table>	Number	Original	Proposed Amendment	PHH1_I4	GIS analysis: No. inshore fishing sites intersected by marine transmission infrastructure (Specific Datasets TBC following consultation with Fisheries groups)	GIS analysis: No. fishing and aquaculture sites intersected by marine transmission infrastructure (Specific Datasets TBC following consultation with BIM, Marine Institute and Fisheries groups)	<p>The SEA process identified that the highest risk of significant impact was identified to be in the inshore zone due to the nature of the grid and the anticipated pinch points for conflict are likely to be at the landing or shallow shores areas.</p> <p>However, the suggested amendments would broaden the scope to ensure wider data capture and recording for future Grid IPs which may have a different environmental context.</p>	<p>The amendments to be made are to align with the suggestions to support future Grid IPs:</p> <p>PHH1_I4 GIS analysis: No. fishing and aquaculture sites intersected by marine transmission infrastructure (Specific Datasets TBC following consultation with BIM, Marine Institute and Fisheries groups)</p>	<p>The amendments to be made are to align with the suggestions to support future Grid IPs:</p> <p>PHH1_I4 GIS analysis: No. fishing and aquaculture sites intersected by marine transmission infrastructure (Specific Datasets TBC following consultation with BIM, Marine Institute and Fisheries groups)</p>
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EDF Renewables Ireland									
We welcome the Draft IP, and its inclusion of ORE Phases 1-3 (noting Department of the Environment, Climate and Communications (DECC) has recently communicated that Phase 3 will become part of the	Noted	None	None						



Submission Text	Detailed response	Changes to NIR	Changes to SEA ER
<p>Future Framework, previously known as the Enduring Regime), the Offshore Renewable Energy Development Plan II (ORED II) (now known as the National Spatial Strategy for Offshore Renewable Energy), and interconnector policy. EirGrid will play a pivotal role in the implementation of offshore wind, and we note that it will provide the offshore transmission infrastructure for the first stage of Phase 2 (ORESS 2.1 - an up to 900MW development off the southeast coast of Ireland)1;2;3;4. The details of EirGrid’s scope in later stages of Phase 2, such as potential additional development off the east coast, and the Future Framework are still to be determined.</p>			
<p>We welcome the commitment to building offshore staffing capacity via PDP3. This will be essential to meet the ambitious target of 20MW of offshore wind by 2040 set out by the Irish Government5. We note that the first 5GW is being delivered by 2030 via Phases 1 and 2, which are both grid led, the next 2GW will be via non grid tenders (previously known as Phase 3) and the route to market for the remainder of the Future Framework is still to be determined. DECC have noted in their recent announcement on the roadmap to 2040 that the full 20GW of offshore wind should be through the competitive process by 2030, therefore this should all be considered within EirGrid’s current Transmission Development Plan (TDP) 2023 and this IP:</p> <p>a. To date EirGrid have focused on the required 5GW by 2030 target, however, viable routes to market to achieve the 2040 targets and beyond are essential to ensure long term developer and investor confidence in the Irish market.</p> <p>b. A significant acceleration on the development of electrical grid infrastructure is critical. We would welcome a greater level of urgency in terms of the scale of the grid infrastructure that will need to be constructed ahead of 2030 to deliver on Ireland’s renewable energy targets.</p>	Noted	None	None



Submission Text	Detailed response	Changes to NIR	Changes to SEA ER
<p>c. In order to achieve the National target of 5 GW operation offshore wind by 2030, it is essential that EirGrid enables swift grid connections for the renewables pipeline and removes all barriers to this, as a matter of urgency. At present, limited availability and long timescales for grid connections are a significant constraint for renewable energy developments and leave Ireland at risk of missing its national renewables and carbon emissions targets. The construction of more grid infrastructure is critical for enabling enough renewable energy projects to connect to the grid to deliver a secure and sustainable energy supply.</p>			
<p>With regards to the consultation and engagement policies and objectives (provided in Section 8 of the Draft IP), we were disappointed that there was no industry specific event during the Shaping Our Offshore Energy Future¹ public engagement sessions in June 2023. We note that there will be further consultation on the south coast proposals in early 2024 and would encourage EirGrid to have an industry specific event. DECC have recently introduced such events as part of their South Coast Designated Maritime Area Plan (DMAP) consultation, including an ORESS 2.1 workshop held on 26 July 2023 and a DMAP workshop on 8 September 2023. Such events were introduced by DECC following feedback on there being no industry specific event during the OREDP II consultation. The engagement has been well received and allows the public engagement sessions to focus on the local community.</p>	Noted	None	None



Submission Text	Detailed response	Changes to NIR	Changes to SEA ER
<p>We welcome the Draft IP's policies and objectives to ensure appropriate protection of the environment and a sustainable approach to grid development, including in relation to offshore development. However, we have the following comments:</p> <p>a. The full scope of the SEA's proposed amendments, recommendations and/or additions to the Draft IP's policies and objectives is unclear. Table 12-3 of the SEA notes it provides "examples" of recommendations, not an exhaustive list, whilst no recommendations are provided in Table 12.1 or 12.2 of the Draft IP. We are, therefore, unable to fully review and respond to the Draft IP's policies and objectives.</p>	<p>A full list of environmental policies are provided in in Table 12.1 and 12.2. These were developed in collaboration with EirGrid. The full extent of the 12 month iterative process for development does not require a comprehensive list of all amendments therefore, table 12.3 is sufficiently detailed. All policies and objectives contained within the plan have been assessed with regard to the SEA and AA processes.</p>	<p>None</p>	<p>None</p>
<p>b. We agree with the addition of policy BIODP6 on corridor and route selection in Table 12-3. Currently the proposed new policy notes that site specific field data may be required. We would recommend updating to note that following option selection, site specific data will be required to inform environmental impact assessment (EIA) and cable design, routing, protection and installation methods.</p>	<p>This additional note would provide clarity.</p> <p>Note: The route selection process is in addition to the environmental impact assessment (EIA) data requirements and reporting.</p>	<p>Update BIODP6 to include note.</p> <p>Note: The route selection process is in addition to the environmental impact assessment (EIA) data requirements and reporting.</p>	<p>Update BIODP6 to include note.</p> <p>Note: The route selection process is in addition to the environmental impact assessment (EIA) data requirements and reporting.</p>
<p>We have reviewed the NIS and agree with the overall conclusion that, following mitigation, the Draft IP will not give rise to any adverse</p>	<p>Update errors in years.</p>	<p>Update Plan Timeline Errors.</p>	<p>Update Plan Timeline Errors.</p>



Submission Text	Detailed response	Changes to NIR	Changes to SEA ER
<p>effects on designated European sites, alone or in combination with other plans or projects. We welcome the acknowledgment that the Appropriate Assessment (AA) process is ongoing and will inform and be concluded at adoption of the IP. We note that the NIS document refers to the 2023-2027 plan, we are assuming that this is a typo? Similarly, there are instances of the plan being referred to as 2023-2029 in the main Draft IP. We have no further comments on the NIS or SEA at this time.</p>			
<p>As noted in Section 2.4 of the Draft IP, meeting the ORE targets requires simultaneous development of various policy, legislative and regulatory workstreams. Spatial planning requires input from various bodies, and we stress the importance of ongoing engagement between EirGrid and the Irish Government (including DECC who are leading the National Spatial Strategy and DMAP process) to ensure the grid and generation aspects of ORE designated area site selection, via the DMAP process, are aligned. Please see the following specific points, which were also included in our recent responses to DECC's ORESS 2 auction design consultation and the South Coast DMAP public engagement period:</p> <p>a. We note that EirGrid actively contributed to the OREDP II constraints mapping and encourage this to continue during the DMAP process, for Phase 2 and all subsequent phases.</p> <p>b. A clear and robust methodology to define DMAPs must be in place to ensure the most suitable sites are selected for each ORE development phase and associated auctions. Furthermore, it is essential that a single department leads the development of each ORE phase, including DMAP identification, grid proposals and linking to the wider industrial strategy, to ensure all of the policy objectives can be met. There are effective examples of this process from other markets, such as in UK where the Crown Estate leads the process, with detailed inputs from National Grid, Natural England, Natural Resources Wales etc. This ensures consistency of approach and a clear pathway to delivery of a fit for purpose offshore wind model.</p>	Noted	None	None



Submission Text	Detailed response	Changes to NIR	Changes to SEA ER
<p>c. We recognise the importance of ORE designated areas being geographically aligned with available onshore grid capacity, however, the offshore substation (OSS) site selection for ORESS 2.1 cannot happen in isolation from the South Coast DMAP process. Section 2.4 of the Draft IP notes that foreshore licences have been submitted to “inform the identification of suitable locations for offshore grid infrastructure” for ORESS 2.1. This implies that areas for locating offshore grid infrastructure have been chosen ahead of the ORESS 2.1 auction site, as the DMAP process is currently ongoing. Although landing sites are limited by onshore grid availability, we strongly caution against the OSS location being the driving factor for auction site selection. Standard practice is to select the site based on the most suitable location for generation to ensure optimisation. OSS siting and design would then be determined based on the generation location.</p> <p>d. We welcomed DECC’s clarification (during their ORE industry DMAP workshop) that the south coast DMAP process will be generation led. We note the confirmation from DECC that the study areas provided in EirGrid’s Shaping Our Offshore Energy Future1 and associated Foreshore Licence applications (FS007661 & FS007660) are initial areas only and do not signal that the location decision has already been made. We would, therefore, assume that surveys associated with EirGrid’s ORESS 2.1 scope will commence following DMAP finalisation, to ensure data is collected for the correct areas, with the site surveys referenced in Foreshore Licence applications FS007661 & FS007660 being amended / additional applications submitted, as required, to align with the chosen generation site (noting that an application to MARA would be required should there be transmission infrastructure beyond 12nm). It would be useful for the arrangements for site surveys to be confirmed as soon as possible.</p> <p>e. Clarity on EirGrid’s scope within Phase 2 is required: i. To date there has been mixed messaging on the grid capacity available for ORESS 2.1, with between 700 MW and 900 MW quoted by EirGrid and DECC.</p>			



Submission Text	Detailed response	Changes to NIR	Changes to SEA ER
<p>We welcome the clarification in Section 2.4 of the Draft IP that ORESS 2.1 will be up to 900MW off the south coast of Ireland. However, during the latest offshore wind task force meeting, DECC (9 November 2023) indicated a 900MW generation limit offshore, but an 800MW limit for the onshore transmission system. This presents risks to the ORESS auction, as it could lead to optimistic bids assuming there will be 900MW available versus more conservative bids assuming 800MW. Alignment with DECC and clarification on the available capacity for ORESS 2.1 is required.</p> <p>ii. For the South Coast will EirGrid be developing transmission infrastructure to support just 900MW associated with ORESS 2.1? Or is there scope for future projects to also connect to this hub? A relevant consideration is that DECC has confirmed that multiple ORE designated areas (in addition to ORESS 2.1) will be defined within the South Coast DMAP. As such, future proofing of the infrastructure should be considered when defining the IP’s policies and objectives.</p> <p>f. Finally, in terms of drafting policy, as part of our ORESS 2 consultation response to DECC we recommended that where EirGrid will be responsible for the planning and development of offshore transmission infrastructure (e.g., as proposed for ORESS 2.1), appropriate penalty schemes or compensation mechanisms and suitable liability clauses should be implemented. This will ensure third party risks to project delivery are appropriately mitigated (e.g., delays to grid connection resulting in generation aspects being fully commissioned with no grid connection available to commence operations).</p>			
Energy Cooperative Ireland Ltd.			
No SEA or AA related content within the submission.	N/A	None	None
Faillte Ireland			



Submission Text	Detailed response	Changes to NIR	Changes to SEA ER
<p>Tourism and the Economy</p> <p>Tourism is a significant component of the Irish Economy – as a revenue generator and economic driver, and also because it makes a special contribution to the Ireland’s sense of place and unique character. Overseas visitors contributed some €5.6 billion to the national economy in 2019. With a further €1.8 billion spent by overseas visitors on fares to Irish carriers. Domestic tourism expenditure amounted to €2.1 billion, making tourism a €9.5 billion industry. This total out-of-state and domestic tourism expenditure of €9.5 billion in 2019 represented 3.6% of modified GNI (gross national income) in revenue terms¹.</p>	<p>Noted</p>	<p>None</p>	<p>None</p>
<p>Tourism and the Environment</p> <p>There are two interactions between tourism and the environment - impacts caused by tourism projects and impacts affecting tourism. With regard to electricity transmission planning and development, it is anticipated that the majority of the interactions would occur as impacts affecting tourism.</p> <p>Fáilte Ireland carries out annual visitor attitude surveys. Fáilte Ireland’s Port Survey of Overseas Holiday makers 2019 identifies the following, in order of priority, as the reasons tourists visit and enjoy Ireland:</p> <ul style="list-style-type: none"> • Interesting history and culture (84%) • Plenty to see and do (89%) • Beautiful scenery (91%) • Natural, unspoilt environment (82%) • Good range of natural attractions (84%) <p>It is noteworthy that beautiful scenery, natural attractions and natural unspoilt environment all score highly as reasons for visiting Ireland. These factors are environmental and relate particularly to our</p>	<p>These insights are valuable. It is important to note that research has shown at a landscape scale windfarms do not have an adverse effect on visitor perception. Furthermore, the plan details the preference for sub terranean cabling where possible. So the comments related to the WAW and other landscape scale issues with regard to grid development need to be contextualised as such.</p>	<p>None</p>	<p>None</p>



Submission Text	Detailed response	Changes to NIR	Changes to SEA ER
<p>landscape and rural areas where electricity transmission infrastructure is likely to be developed.</p> <p>Beautiful scenery – Particular attention needs to be given to effects on views from existing purpose-built tourism facilities, as well as views from touring routes and walking trails. Initiatives such as the Wild Atlantic Way have the potential to be particularly affected by transmission infrastructure related developments which are located within viewing distance from the coast. Indeed, scale and sighting of individual and cumulative developments must also be taken into consideration.</p> <p>Natural attractions – It is important to avoid any effects that may negatively impact local attractions and experiences.</p> <p>Natural Unspoilt Environment, experiences and attractions – Tourism programmes (e.g. Wild Atlantic Way, Irelands Hidden Heartlands etc), are based upon the visitor exploring the natural, unspoilt landscapes of Ireland, including its waters. It is important that electricity transmission-related development and activities do not have a negative impact on our natural environmental assets with identified tourism potential.</p>			
<p>Tourism and Policy</p> <p>Over the last number of years, Fáilte Ireland has worked closely with Local Authorities and Government Departments throughout Ireland to promote the spatial management of tourism. This move away from the traditional objective-based approach has seen tourism increasingly thought of as a ‘land-use’ – one which must be considered and planned for in the context of a whole range of other uses all of which compete for resources, space and priority. Similarly, these principles must be applied to transmission planning and related activities.</p> <p>Ireland has made a significant move towards integrated spatial planning for land resources in recent years. Planning for tourism critically requires an understanding of the local market and then an</p>	Noted	None	None



Submission Text	Detailed response	Changes to NIR	Changes to SEA ER
<p>appreciation of the physical needs of the sector to meet those market needs, while balancing these in the wider context of sustainable planning and development.</p> <p>Transmission development presents opportunities for many businesses including tourism, especially within areas with poor transmission infrastructure. As such, the electricity transmission sector has huge opportunity to support the delivery and quality of the visitor experience particularly in rural areas.</p> <p>While the Authority is generally supportive of the development of transmission infrastructure, and is supportive of the economic benefits associated with its growth and development, potential impacts on landscape and the natural environment (including those on tourism) must be considered.</p>			



Submission Text	Detailed response	Changes to NIR	Changes to SEA ER
<p>Draft Grid Implementation Plan (2023-2028)</p> <p>As is outlined within section 6.1 of the Draft IP “A focus in the development of our projects is on matters of proper planning and sustainable development. This requires a careful balancing of the technical need and solutions for a project with appropriate and adequate opportunities for public participation in the project development process. It must also include significant emphasis and focus on the environmental impact of the project, primarily in reference to the EU Habitats Directive, Birds Directive and EIA Directive, but also in terms of social impact”.</p> <p>The SEA associated with the Draft IP notes that in respect of data gaps and limitations, “the lack of baseline data to cover all SEA aspects/ issues, such as landscape character assessment designations across some development areas”, limits the scope and content of the assessment.</p> <p>In section 4.3, EirGrid acknowledges the challenges that exist, but state however that they are “committed to ensuring continued compliance with governing law and practice...and avoiding and mitigating against adverse impact in topics such as biodiversity, cultural heritage, water, landscape, soils and noise”.</p> <p>Notwithstanding this statement, Fáilte Ireland consider that the policies relating to Landscape and Tourism, are not sufficiently strong to ensure same.</p>	<p>It is important to note that the plan and assessments focus on environmental compliance. The comments from Failte do not identify any specific fault but merely state the policies for landscape and tourism are not sufficiently strong – however, this is in the context of their industry in isolation without regard for other sector needs. The existing policies ensure there will be no significant impacts on tourism due to the implementation of the plan.</p>	<p>None</p>	<p>None</p>



Submission Text	Detailed response	Changes to NIR	Changes to SEA ER
<p>The Draft IP policies are therefore replicated hereunder, with amendments recommended by Fáilte Ireland indicated below (in red):</p> <p>Landscape</p> <p>It is the policy of EirGrid:</p> <p>ENVP09: To have regard to the objectives of the National Landscape Strategy and the Regional Seascape Character Assessment in onshore and offshore grid development projects, to protect landscapes and seascapes from grid development</p> <p>It is the objective of EirGrid:</p> <p>ENVO4: To have regard to any future National Landscape and/or Seascape Character Assessment in the development of its grid development projects.</p> <p>Tourism</p> <p>The absence of a tourism related policy of EirGrid is noted with suggested inclusion in below:</p> <p>“To consider the potential impact upon tourism in the development planning of transmission projects, and to protect tourism resources through the appropriate and sustainable planning and design of transmission infrastructure development. “</p> <p>It is the objective of Eir Grid to:</p> <p>ENVO6: To identify the nature of tourism in a project area; to explore how that landscape influences/ supports tourism in a project area; to consider the cumulative / in combination impact on tourism of a project and to consider short term and long term impacts of grid development projects on tourism as appropriate.</p> <p>ENVO12: To ensure that site selection and design of new overground infrastructure onshore and offshore considers views from existing purpose-built tourism facilities, as well as views from touring routes, walking trails, scenic viewing points, blueways and greenways</p>	<p>The suggested amendments places undue constraints on the grid development process which is not consistently implementable.</p> <p>There is no clear national registry or data source for ‘known’ tourism resources – nor is there a legal framework for their protection.</p> <p>The following suggestion however is well placed.</p> <p>“To consider the potential impact upon tourism in the development planning of transmission projects, and to protect tourism resources through the appropriate and sustainable planning and design of transmission infrastructure development.</p> <p>“</p> <p>As well as the addition of the word blueway in ENV012.</p>	<p>Update ENV012 to include the word blueway.</p> <p>Update to include new policy:</p> <p>“ENV014: To consider the potential impact upon tourism in the development planning of transmission projects, and to protect tourism resources through the appropriate and sustainable planning and design of transmission infrastructure development.</p> <p>“</p>	<p>Update ENV012 to include the word blueway.</p> <p>Update to include new policy:</p> <p>“ENV014: To consider the potential impact upon tourism in the development planning of transmission projects, and to protect tourism resources through the appropriate and sustainable planning and design of transmission infrastructure development.</p> <p>“</p>



Submission Text	Detailed response	Changes to NIR	Changes to SEA ER
<p>HBS05: To protect known tourism resources by avoidance initially and to robustly To assess and mitigate wherever possible the potential impact upon tourism in the development of grid development projects onshore and offshore, particularly on natural and unspoilt attractions with identified tourism potential</p>			
<p>Just Transition: Section 6.8.1 of the Environmental Report referencing the EU Just Transition fund is noted. Through this scheme Fáilte Ireland will invest in the sustainable development of tourism in the Midlands with the aim of diversifying the regional economy by creating jobs, supporting habitats and biodiversity and sustaining communities. It is anticipated that EirGrid’s sustainable grid development will include full consideration of this scheme under PDP2 in balancing complex and/or competing technical, economic, environmental, social and deliverability goals and priorities in the midlands.</p> <p>Social Impact Assessment: Fáilte Ireland welcomes the development of a framework for Social Impact Assessment (SIA) to provide a format in assessing the potential social impacts of grid development projects and to also address a range of tangible (measurable) considerations, but also intangible issues such as local knowledge, perceptions, vulnerabilities, language and beliefs for those individuals, community or network of communities that are most likely to be affected by a project.</p> <p>Fáilte Ireland would suggest inclusion of authentic locally based tourism enterprises in the assessment that provide a wide range of visitor experiences. These community enterprises and local experiences deliver a wide range of (sometimes intangible) economic, social, cultural and environmental benefits, together with ensuring a highly authentic experience for our visitors meriting inclusion in the Social Impact Assessment process.</p>	<p>Noted</p>	<p>None</p>	<p>None</p>



Submission Text	Detailed response	Changes to NIR	Changes to SEA ER
<p>Recommendations</p> <p>Fáilte Ireland recognises the value and necessity of strengthening, improving and expanding electricity transmission infrastructure in Ireland, and that this in turn supports the growth of the tourism sector.</p> <p>It is however imperative that the future framework in respect of electricity transmission infrastructure development, planning and provision, consider minimising any potential damage to the environment and industries dependent upon this. In particular for tourism which may be directly or indirectly affected, both positively and negatively, by its implementation.</p> <p>Fáilte Ireland believes that this can be achieved through the recommended amended policies and objectives as outlined earlier within this submission. Please do not hesitate to contact us if you have any further queries and we would be happy to meet with you at any time to discuss our submission and/ or provide further information.</p>	Noted	As above	As above
Meath County Council			
<p>Thank you for your recent consultation in relation to the Grid Implementation Plan (IP) 2023-2028 for the Electricity Transmission System in Ireland. Meath County Council welcomes the opportunity to comment on the Draft Plan and the associated Environmental Assessments.</p> <p>On the 30th of January 2023, Meath County Council made a submission to the Grid Implementation Plan 2023-2028 for the Electricity Transmission System in Ireland – Scoping Consultation. While this submission is acknowledged in Section 5.2 of the SEA Environmental Report, contrary to other submissions, details of this submission are not summarised in Appendix C of the Environmental Report. Accordingly, the Council wish to confirm that our previous</p>	It is confirmed that this submission was reviewed and considered by the assessment.	Update Appendix C to include consultation considerations.	Update Appendix C to include consultation considerations.



Submission Text	Detailed response	Changes to NIR	Changes to SEA ER
<p>submission was reviewed and considered as part of the previous consultation process.</p>			
<p>This Grid Implementation Plan and its associated Environmental Reports set out the objectives and policies to implement the overarching plans of Shaping our Energy Future and the Transmission Development Plan 2018-2027. A unique opportunity and challenge of this Plan is the role it will have in the generation of offshore wind in Irish coastal waters. The absence of previous supporting policy in this area has led to considerable developmental delays in this sector and the Implementation Plan must ensure it can facilitate such development whilst ensuring the environmental integrity of these waters.</p> <p>The Council has reviewed the Grid IP 2023-2028 and the SEA Environmental Report. The opinions and recommendations outlined below are broadly reflective of the previous views submitted as part of the scoping consultation process in January 2023. Accordingly, Meath County Council wish to make the following observations on the Draft Plan and accompanying environmental reports.</p>	<p>Noted</p>	<p>See below</p>	<p>See below</p>
<p>Policies and Objectives of the Implementation Plan</p> <p>The Council have reviewed the draft policies and objectives of the Draft Implementation Plan and wishes to commend EirGrid and Fehily Timoney on a comprehensive suite of policies and objectives within which they will work. The development of a Geographical Information System displaying existing and proposed grid development projects and the development of an environmental database will greatly assist in the transparency process (ENVO10) and baseline knowledge for EirGrid.</p> <p>As outlined in our previous submission, Meath County Council has found an annual increase in the number of solar farm planning applications lodged in the County. By October 2022, records reflected that 34 solar farms in County Meath had received full planning</p>	<p>The changes suggested are to be considered by EirGrid – there are no materials presented related to the SEA or AA processes except in relation to PDP1 (PDO1 is an error) which is a beneficial additional update.</p>	<p>Update PDP1 to include periodic reviews of the efficacy of the grid connection process for renewable energy projects.</p>	<p>Update PDP1 to include periodic reviews of the efficacy of the grid connection process for renewable energy projects.</p>



Submission Text	Detailed response	Changes to NIR	Changes to SEA ER
<p>permission. Notwithstanding this, only six of these permissions had commenced.</p> <p>Under current EirGrid policy, it is understood that projects are not able to formally apply for a grid connection offer until having firstly received planning permission. In the interest of expediting the delivery of renewable energy and their connection to the national grid, the Council suggested that our Electrical Transmission Operator, EirGrid, consider setting up an operation similar to the Irish Water Connection process. Such a process could optimise the benefits of early consultation with EirGrid through a pre-connection enquiry phase in the early stages of the project with a view to receiving a Confirmation of Feasibility which could be submitted with a planning application, the objective being to considerably reduce the timeline of a project from inception to completion.</p> <p>Given the strict timelines set out in the current Climate Action Plan (CAP) 2023 and the failure to achieve our targets to date, efficient implementation is critical to our compliance with the CAP and mechanisms that could expedite the delivery of renewable energy projects should be frequently reviewed. We note the current objective PD01 aims to undertake periodic reviews of the approach, policies and process to the development of grid development projects and ask that this policy is extended to include periodic reviews of the efficacy of the grid connection process for renewable energy projects.</p> <p>As previously recommended, the establishment of a Pre-Connection Enquiry process and Confirmation of Feasibility Process for Solar Farm Applications that are strategically located and immediately connectable to the national grid would be a key recommendation for incorporation into the next draft Implementation Plan or their Operational Pathway to 2030 Programme, whichever is deemed most appropriate.</p>			



Submission Text	Detailed response	Changes to NIR	Changes to SEA ER
<p>It is also suggested that EirGrid should be included as a Statutory Consultee Prescribed Body in Planning Application Referrals as part of the proposed above recommendation.</p>			
<p>List of Consultees The list of stakeholders that EirGrid propose to engage with was outlined in Page 6 of the previous Scoping Report and encompassed an extensive list of non-statutory bodies. The Council wishes to acknowledge EirGrid's comprehensive consultation proposals and note that SEA scoping was further extended to include numerous civil society participation networks, such as Friends of the Earth, Irish Environmental Network / Environment Pillar, and Public Participation Networks. While the previous submission from Meath County Council recommended that the Irish Solar Energy Authority (ISEA) be included in this list, it is not clear from the documentation provided whether this has been the case. Given the growth of solar energy in Ireland over recent years, we recommend that, as the key representative for solar development in Ireland, ISEA be consulted concerning any future Implementation Plan.</p>	<p>The consultation process is now closed – these non-statutory bodies have not been directly consulted, however all of the requisite efforts were made to publicise the Draft Plan and open access consultation.</p>	<p>None</p>	<p>None</p>
<p>Relevant Legislation, Plans & Programmes It is essential that measures within EirGrids Draft Implementation Plan do not impinge on the delivery of the objectives of the Marine Strategy Framework Directive (MSFD). We acknowledge that the Marine Strategy Framework Directive (MSFD) is now included in Appendix A outlining relevant Legislation, Plans and programmes and note the Draft Implementation Plans policy ENVP2 to improve EirGrid's approach to protecting the marine environment. However, in the absence of a Strategic Environmental Objective (SEO's) relating to marine waters in Table 13.2, the current SEOs are too narrow to adequately capture the environmental impacts of the Plan on coastal waters during the monitoring phase of the plan.</p>	<p>The SEOs detail the maintain water quality in accordance with the WFD which includes transitional coastal waters. Additionally the effects to biodiversity includes the marine species and habitats-however this will be made more clear.</p>	<p>Amend W1 and add W5 as follows:</p>	<p>Amend W1 and add W5 as follows:</p>



Submission Text	Detailed response	Changes to NIR	Changes to SEA ER
<p>To ensure that environmental effects on Irish coastal waters are captured during the monitoring phase, we recommend the incorporation of an additional Water SEO pertaining to the marine environment. As outlined in our previous recommendation, below is an example of such an objective;</p> <p>'Minimise impacts on water quality and support the achievement of the objectives of the Marine Strategy Framework Directive.</p>	<p>The suggested addition will be inserted as suggested. 'Minimise impacts on water quality and support the achievement of the objectives of the Marine Strategy Framework Directive.</p>	<p>W1: Maintain and/or improve, the quality and status of surface and marine waters, including supporting for the objectives for the Draft Third Cycle River Basin Management Plan (2022-2027) where relevant and appropriate.</p> <p>W5: Minimise impacts on water quality and support the achievement of the objectives of the Marine Strategy Framework Directive.</p>	<p>W1: Maintain and/or improve, the quality and status of surface and marine waters, including supporting for the objectives for the Draft Third Cycle River Basin Management Plan (2022-2027) where relevant and appropriate.</p> <p>W5: Minimise impacts on water quality and support the achievement of the objectives of the Marine Strategy Framework Directive.</p>



Submission Text	Detailed response	Changes to NIR	Changes to SEA ER
<p>Strategic Environmental Objectives (SEOs)</p> <p>As outlined in our previous submission, the SEO's have been reviewed and whilst the objectives broadly identify targets against which the environmental effects of the plan can be tested on land, the environmental objectives also need to set standards against which off-shore development can be measured. This includes expanding the scope of certain SEOs to incorporate biodiversity in Irelands seas, maritime heritage and water quality as it pertains to the Marine Strategy Framework Directive. Accordingly, the following suggestions in bold are offered to broaden the scope of the SEO's to encompass both onshore and offshore considerations;</p> <ul style="list-style-type: none"> • CH1: Avoid impacts upon archaeological heritage (including entries to the RMP), and architectural heritage (including entries to the RPS and NIAHs) and marine heritage. • B5: To avoid, or minimise damage to the biodiversity, flora and fauna in the Marine ecosystems of Irelands seas and transboundary waters. <p>It is hoped the above comments will be of assistance and if deemed appropriate, consider how best they could be incorporated into the Draft Plan and associated Environmental Reports. We look forward to the publication of the final Implementation Plan</p> <p>Should you have any queries, please do not hesitate to contact me.</p>	<p>Biodiversity flora and fauna is not restricted to terrestrial ecosystems and thus already encompasses the suggested changes. However, for clarity this will be updated.</p>	<p>Update Seo CH1 and add B5</p> <ul style="list-style-type: none"> • CH1: Avoid impacts upon archaeological heritage (including entries to the RMP), and architectural heritage (including entries to the RPS and NIAHs) and marine heritage. • B5: To avoid, or minimise damage to the biodiversity, flora and fauna in the Marine ecosystems of Irelands seas and transboundary waters. 	<p>Update Seo CH1 and add B5</p> <ul style="list-style-type: none"> • CH1: Avoid impacts upon archaeological heritage (including entries to the RMP), and architectural heritage (including entries to the RPS and NIAHs) and marine heritage. • B5: To avoid, or minimise damage to the biodiversity, flora and fauna in the Marine ecosystems of Irelands seas and transboundary waters.
<p>Marine Institute</p>			



Submission Text	Detailed response	Changes to NIR	Changes to SEA ER
<p>Draft Natura Impact Statement,</p> <p>This document outlines an approach to Appropriate Assessment (AA) for the Grid Implementation Plan 2023-2028, which includes a screening and Appropriate Assessment (Natura Impact Statement - NIS). The AA process is designed to identify, assess and mitigate potential impacts on European sites and their qualifying interests protected under the Habitats and Birds Directives.</p> <p>The approach takes into account various legislation and guidance, including the Appropriate Assessment of Plans and Projects in Ireland, European Commission notices, and methodological guidance on the provisions of the Habitats Directive. In summary, the approach appears to be thorough, considering ecological and hydrological expertise, a detailed review of scientific literature, and compliance with relevant legislation.</p> <p>The focus seems primarily on terrestrial and freshwater habitats although in terms of marine considerations, the text does acknowledge the national scope/geographic scale of the Draft Grid IP, covering all of the Republic of Ireland, including European sites in both Ireland and Northern Ireland, as well as marine areas. The assessment process includes consideration of hydrogeological processes and potential effects on groundwater-sensitive habitats and species and acknowledges that disturbance or displacement of QI species may occur. The AA, however, should also consider likely effects outside of Natura 200 sites, particularly as they relate to highly mobile or migratory species. This would have particular relevance to marine systems.</p> <p>The approach taken in Stage 2 Appropriate Assessment (AA) discusses various considerations related to the potential impact of the Draft Grid IP on European sites, with a particular focus on ecological integrity. In the context of marine considerations, the text does touch upon some aspects related to water quality, including surface and</p>	<p>With regard to the AA process, most of the habitats and species which relate are terrestrial or coastal; which is why the text focuses on these. A marine focused SEO is being added to ensure this is a clear focus of the Plan.</p>	<p>Add a marine focused SEO and update text to provide a clear assessment of marine impacts in the context of the assessment process.</p> <ul style="list-style-type: none"> • B5: To avoid, or minimise damage to the biodiversity, flora and fauna in the Marine ecosystems of Irelands seas and transboundary waters. 	<p>Add a marine focused SEO and update text to provide a clear assessment of marine impacts in the context of the assessment process.</p> <ul style="list-style-type: none"> • B5: To avoid, or minimise damage to the biodiversity, flora and fauna in the Marine ecosystems of Irelands seas and transboundary waters.



Submission Text	Detailed response	Changes to NIR	Changes to SEA ER
<p>ground water, and mentions policies and objectives to protect the water environment. Additionally, there is a reference to the Marine Strategy Framework Directive and Water Framework Directive to minimise impacts on marine water quality.</p> <p>However, a more direct and detailed consideration of marine aspects, such as the impact on marine habitats, species, or ecosystems, seems to be somewhat limited in the text. While the document mentions the protection of water resources, including rivers, streams, wetlands, and coastal waters, it would be important to ensure that all relevant marine aspects are adequately addressed.</p>			
<p>In the NIS Appendix section: “Relevant EU and National Legislation” the addition of CFP would be recommended under international Legislation</p> <p>Context REGULATION (EU) No 1380/2013 on the Common Fisheries Policy</p> <p>A healthy marine environment with healthy fish stocks and rich biodiversity is the only way to ensure a prosperous future for EU fisheries communities in the medium and long-term. The CFP should ensure that fishing and aquaculture activities contribute to long-term environmental, economic, and social sustainability.</p>	Noted.	Update Appendix to include CFP.	Update Appendix to include CFP.
<p>Strategic Environmental Assessment (SEA) for the EirGrid Grid Implementation Plan 2023-2028</p> <p>The Strategic Environmental Assessment (SEA) for the EirGrid Grid Implementation Plan 2023-2028 covers various environmental themes including marine considerations, landscape, cultural heritage, geology, land use, water quality, climate change, and more. Overall, the summary indicates that marine considerations are part of the comprehensive environmental assessment conducted for the EirGrid Grid Implementation Plan but the emphasis is on terrestrial systems.</p>	Noted. This is in-keeping with the existing considerations, however clarity will be provided in the text with respect to the marine environment.	Add a marine focused SEO and update text to provide a clear assessment of marine impacts in the context of the assessment process.	Add a marine focused SEO and update text to provide a clear assessment of marine impacts in the context of the assessment process.



Submission Text	Detailed response	Changes to NIR	Changes to SEA ER
<p>It should be remembered that our coastal and marine environments can begin up to 100 kilometres inland, extend to the continental shelf, and also includes ocean systems. It is recommended that throughout the SEA that increased emphasis is placed on the assessment of our marine ecosystem goods, services and cultural benefits.</p> <p>The document refers to the government's commitment to offshore wind development, raising the target from 5GW to 7GW. This focus on offshore renewable energy, may have implications for marine environments.</p> <p>The list of other plans and projects have been considered includes the National Marine Planning Framework, indicating consideration of marine planning in the context of the grid implementation. In addition, the Offshore Renewable Energy Development Plan (ORED P II) is mentioned, which will specify planning for the development of offshore renewable energy projects. The Seafood Operation Programme/ Strategic Aquaculture Programme (DAFM) and Harnessing Our Ocean Wealth (DAFM) were also considered. It would be important to include the DAFM (2022). National Strategic Plan for Sustainable Aquaculture Development 2030 and in particular that these are reflected in the EirGrid Policies in Table 11-3: Policy Assessment.</p> <p>A number of effects and measures are also included that have relevance to marine areas. The SEA takes into account potential transboundary environmental effects, with consultations conducted with relevant authorities in Northern Ireland, France, and Wales. The assessment also considers cumulative and in-combination effects between projects, and it concludes that, in general, there are no anticipated significant cumulative or in-combination effects. Inherent mitigation measures, statutory requirements, and EirGrid's in-house processes are highlighted as strategies to avoid or mitigate potential environmental effects. It is recommended that these are strengthened</p>		<ul style="list-style-type: none"> • B5: To avoid, or minimise damage to the biodiversity, flora and fauna in the Marine ecosystems of Irelands seas and transboundary waters. 	<ul style="list-style-type: none"> • B5: To avoid, or minimise damage to the biodiversity, flora and fauna in the Marine ecosystems of Irelands seas and transboundary waters.



Submission Text	Detailed response	Changes to NIR	Changes to SEA ER
<p>to account specifically for Marine environments and their goods, services and cultural benefits.</p> <p>The document acknowledges data gaps and limitations, including the undeveloped nature of specific project details. This suggests an awareness of the need for further data collection and assessment. A monitoring framework is proposed to manage and monitor potential significant negative effects and unforeseen effects of the Grid Implementation Plan, covering various environmental aspects, including marine considerations. It would be recommended that relevant regulatory government departments and their agencies are consulted on such implementations.</p>			
Environmental Protection Agency			
<p>Integration of environmental considerations</p> <p>We note the recognition that an essential component of grid development is to understand how developing the transmission system might affect the environment and that the consideration of the environment is central to EirGrid’s planning and implementation. We welcome the strong emphasis on public consultation and engagement in EirGrid’s approach to grid development and related decision making.</p> <p>We also welcome the extent to which the environmental assessments have been integrated into the Plan. We note the inclusion of specific environmental policies and objectives covering biodiversity, water, climate change, human health aspects. We acknowledge the inclusion of specific chapters related to environmental considerations.</p> <p>By integrating the SEA ER findings and recommendations into the Plan, maximises the potential for overall positive environmental outcomes. We acknowledge the inclusion of SEA mitigation measures in both the SEA ER and the Plan.</p>	Noted	None	None



Submission Text	Detailed response	Changes to NIR	Changes to SEA ER
<p>We welcome that consideration of environmental issues has become a core part of grid planning and development. We also note the various guidance documents prepared by EirGrid to help in the development of transmission-related projects. We suggest that project guidance documents continue to be reviewed at regular intervals, to ensure they reflect current environmental policy and associated good practices.</p> <p>It will be important that EirGrid’s approach continues to evolve alongside a greater understanding of the electricity transmission grid (both onshore and offshore) and how it interacts with the human, built and natural environment. These, along with related monitoring, will provide the basis for informed environmental planning and decision making for the on-going development of the grid over the lifetime of the Plan and beyond.</p>			
<p>Monitoring</p> <p>We welcome the extent to which the SEA monitoring for the Plan has been considered. We also acknowledge the reference to the EPA’s Guidance on SEA Statements and Monitoring (2020), which has been considered in preparing the SEA. An update of this guidance was published in 2023 and is available at: https://www.epa.ie/publications/monitoring--assessment/assessment/strategic-environmental-assessment/06695-EPA-SEA-Statements-and-Monitoring-Report.pdf</p> <p>The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and address the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. If monitoring identifies adverse impacts during the implementation of the Plan, EirGrid should ensure that suitable and effective remedial action is taken.</p>	Noted	Update recent reference.	Update recent reference.



3. CONSIDERATION OF ALTERNATIVES

3.1 Introduction

Article 5(1) of the SEA Directive states that: 'Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated.'

The SEA Directive requires that reasonable alternative means of achieving the strategic goals of the Grid IP (taking into account the objectives and the geographical scope of a plan or programme) are identified, described and evaluated for their likely significant effects on the environment. Such reasonable alternative must be realistic and capable of implementation.

Reasonable alternatives to the Grid IP were initially explored and examined during the SEA Scoping stage of the SEA process, having regard to the scope, function and strategic aims and main objectives of the Grid IP, as defined in the Grid IP. This process facilitated the accurate identification of reasonable alternatives to the Grid IP and also suitably informed the plan-making process, ensuring optimal environmental outcomes.

Reasonable alternatives were assessed against the Strategic Environmental Objectives (SEOs) established for the aspects of the baseline environment which are likely to be significantly affected by the Grid IP.

3.2 Approach to Developing Reasonable Alternatives

A range of alternatives to the Grid IP were considered during the plan-making process. The approach for identifying reasonable alternatives to the Grid IP is defined below:

1. Iterative communication was held between the plan-making and environmental assessment teams to identify the various alternative approaches and options being considered to achieve the vision of the plan. This communication commenced early on during the plan-making process.
2. Reasonable alternatives considered were identified. For an alternative to be considered reasonable, it must be practical/functional, realistic and implementable. An evaluation of whether each alternative was practical/functional, reasonable and implementable took place. This evaluation considered the following factors:
 - The vision of high-level objectives of the Grid IP.
 - The geographic scope of the Grid IP.
 - The actual powers and functions of the Local Authority.
 - The climate action merits of the alternative.
 - The genuine ability of the alternative to achieve the plan vision and high-level objectives.
 - The technical feasibility of the alternative.
 - The availability of resources, including financial resources to deliver the plan within the required timeframe.
 - The policy hierarchy and the parameters placed around the Grid IP by higher-level policy.
 - The legislative context and the parameters placed around the Grid IP by climate action and environmental related legislation.



The toolkit contained in the EPA's guidelines entitled 'Developing and Assessing Alternatives in Strategic Environmental Assessment Good Practice Guidance' (2015) was utilized when identifying reasonable alternatives. The 'Why? What? Where? When?' Model defined in the guidelines were used when framing reasonable alternatives, as shown in Figure 3-1.

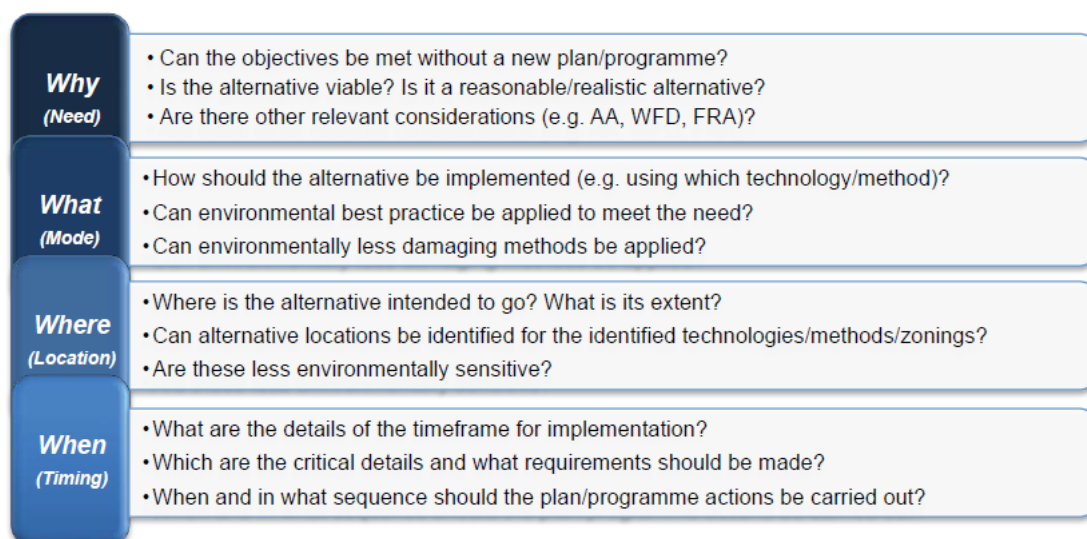


Figure 3-1: 'Why? What? Where? When?' Model for framing alternatives - Adapted from Figure 4.3 Developing and Assessing Alternatives in the Strategic Environmental Assessment Process (EPA, 2015).

3.3 Identification and Description of Reasonable Alternatives

Reasonable alternatives to the Grid IP were identified. A description of these reasonable alternatives and the reasons for selecting these reasonable alternatives are presented in Table 3-1.

Alternatives	Considerations
1) No Plan - With reliance on the Grid Development Strategy	<p>In the absence of the Grid IP grid development would still occur but it would not be framed by targeted policies and objectives designed to ensure sustainable grid development.</p> <p>This could result in a more ad hoc approach to grid development and there would be some uncertainty with regards to the achievement of the SEOs. There would be a mixture of positive and negative effects on the SEO's.</p> <p>Any development would be subject to planning/legal processes that would reduce potential environmental effects. However, this alternative does not take account of the environmental policies included in the Grid IP. These would have positive impacts in relation to protecting the environment with respect to future grid development.</p>
2) Continuation of Previous Plan- Grid 25 Implementation Programme	<p>This alternative would involve development of the projects identified in the Grid IP by applying the policies and objectives from the previous plan. Applying the previous plan policies would not take account of:</p> <ul style="list-style-type: none"> The strengthened policies developed through the SEA process and adopted in the Grid IP. The progress and commitments made by EirGrid with regard to Community Benefits Scheme and dedication to environmental record gathering. The role of EirGrid as TSA and TSO within the marine space. The provisions for emergency generation facilities. The recommendations and mitigation in the SEA ER for the Grid IP.



Alternatives	Considerations
	<p>The previous plan is recognized to include some policies and objectives for environmental protection and the planning/legal process would provide some basis for reducing environmental adverse effects. However, the development of proposed projects in the absence of updated policies and objectives would likely result in stronger negative effects or more protected project development timeframes.</p>
<p>3) New and updated Grid Implementation Plan incorporating Irelands Grid Strategy, updated and strengthened environmental policies and objectives and the TDP i.e. 2023-2028 Plan (Preferred Alternative)</p>	<p>The Grid IP outlines the current understanding of the grid development over the next six years. This grid development has been guided by defined and relevant protective policies aimed at meeting EirGrid 's legal, planning and licensing obligations.</p> <p>The fact that implementation of the Grid IP would have some adverse impacts is recognized as a negative.</p> <p>However, in general the implementation of the Grid IP in compliance with policies and objectives would likely result in stronger positive effects.</p>



Table 3-1: Reasonable Alternatives to the Grid IP

Alternatives	Likely to Improve status of SEOs	Likely to Improve status of SEOs to a lesser degree	Least Potential Conflict with status of SEOs- likely to be mitigated	Potential Conflict with status of SEOs- likely to be mitigated	Probable Conflict with status of SEOs- unlikely to be mitigated	No Likely interaction with status of SEOs
No Plan - With reliance on the Grid Development Strategy					In the absence of the Grid IP grid development would still occur but it would not be framed by targeted policies and objectives designed to ensure sustainable grid development.	
Continuation of Previous Plan- Grid 25 Implementation Programme		Policies: ENVP1, ENVP2, ENVP3, ENVP4, ENVP5, ENVP6, ENVP7, ENVP8, ENVP9, ENVP10, ENVP11, ENVP12, ENVP13, ENVP16, ENVP17, ENVP18, ENVP19, ENVP20 (MWQ), ENVP21 (MWQ), ENVP22 (GS), PDP2, PCP3		Policies: CEP1, CEP2, CEP3, CEP4, HBSP1, TP1 Objectives: HBSO1, HBSO2, HBSO3, TO1		



Alternatives	Likely to Improve status of SEOs	Likely to Improve status of SEOs to a lesser degree	Least Potential Conflict with status of SEOs- likely to be mitigated	Potential Conflict with status of SEOs- likely to be mitigated	Probable Conflict with status of SEOs- unlikely to be mitigated	No Likely interaction with status of SEOs
		Objectives: ENVO1, ENVO2, ENVO3, ENVO4, ENVO5, ENVO12, ENVO13, ENVO14, ENVO7, ENVO8, ENVO9, PDO2				
New and updated Grid Implementation Plan incorporating Irelands Grid Strategy, updated and strengthened environmental policies and objectives and the TDP i.e. 2023-2028 Plan (Preferred Alternative)	<p>Policies: ENVP1, ENVP2, ENVP3, ENVP5, ENVP6, ENVP7, ENVP8, ENVP9, ENVP10 , ENVP11, ENVP12, BIODP1, BIODP2, BIODP3, BIODP4, PDP2, PCP1, PCP2, PCP3, PCP4, PCP5, CEP1, CEP2, CEP3, CEP4, HBSO6</p> <p>Objectives: ENVO1, ENVO2, ENVO3, ENVO4, ENVO5, ENVO7, ENVO8, ENVO9,</p>		<p>Policies: ENVP4, CLIMP1, CLIMP2, CLIMP3, TP1, TP2, TP3, TP4, TP5, TP6, PDP1, PDP3, PDP4, PDP5, CEP1, CEP2, CEP3, CEP4, HBSO1, HBSO2, HBSO3, HBSO4</p> <p>Objectives: ENVO6, ENVO12, CLIMO1, CLIMO2, CLIMO3,</p>			



Alternatives	Likely to Improve status of SEOs	Likely to Improve status of SEOs to a lesser degree	Least Potential Conflict with status of SEOs- likely to be mitigated	Potential Conflict with status of SEOs- likely to be mitigated	Probable Conflict with status of SEOs- unlikely to be mitigated	No Likely interaction with status of SEOs
	ENVO10, ENVO11, ENVO13, ENVO14, ENVO15, BIOD01, BIOD02, BIOD03, BIOD04, BIOD05, CULT01, CULT01, PDO1, HBSO1					



3.4 Evaluation of Reasonable Alternatives and Reasons for Choosing the Preferred Plan

An evaluation of the potential effects of the reasonable alternatives on the baseline environment was carried out in accordance with the SEA Directive and best practice guidelines. This evaluation is documented in the SEA Environmental Report for the Grid IP. A summary of this evaluation and the reason for choosing the preferred Plan is presented below.

Grid IP 2017 – 2022 (Old Version)	Grid IP 2023 – 2028 (New Version)	Preferred Option to Take Forward
<p>A total of 34 new projects have been brought forward in Grid IP 2017 – 2022 including the Celtic Interconnector Project and the Regional Solution, both of which aim to strengthen the electricity grid in Ireland to meet future requirements.</p>	<p>Over 200 projects have been brought forward in Grid IP 2023 – 2028 including the Celtic Interconnector Project and the Regional Solution, both of which aim to strengthen the electricity grid in Ireland to meet future requirements.</p>	<p>Grid IP 2023- 2028 The new projects provide potential for long term customer benefits.</p>
<p>The Framework for Grid Development: The six-step process for all EirGrid grid development projects which integrates the technical development of a project with enhanced engagement (with stakeholders, communities and landowners), environmental assessment and social assessment. It also provides enhanced governance points throughout the process.</p>	<p>The same project development process will be followed. However the SEOs and general environmental protocols incorporated into the updated Grid IP have improved processes.</p>	<p>Grid IP 2023- 2028 with a more robust, detailed and inclusive framework likely to lead to improved project outcomes in relation to the SEOs.</p>
<p>Grid Strategy (2017): Irelands Grid Strategy This was developed with stakeholders and through public consultation and is based on the three broad strategy statements which differ significantly from the original Grid25 approach. It allows for a more inclusive consultation process with local communities and stakeholders. A new approach to engagement when developing the grid was developed. Consideration has been afforded to all practical technology options. EirGrid are committed to engaging with the public before identifying a preferred technology. This consultation will explain the transmission technology options,</p>	<p>The communication processes from the previous grid plan have been further refined and developed based on previous learnings.</p>	<p>Grid IP 2023-2028 provides a framework which can limit environmental effects with the emphasis on use of upgrading and also provide a basis for optimising individual scheme routes and design and technology use to minimise effects taking account of stakeholder views.</p>



Grid IP 2017 – 2022 (Old Version)	Grid IP 2023 – 2028 (New Version)	Preferred Option to Take Forward
<p>and then seek feedback from stakeholders.</p> <p>This will help EirGrid to determine the best transmission technology for future projects and ensure commitment to looking for alternative options that may avoid or reduce the need for new overhead lines.</p> <p>Allows for the continued maximisation of the use of the existing electricity grid with an aim to avoid constructing new lines or cables, where possible. This will be achieved by increasing the capacity of existing infrastructure, or by using new technologies. This strategy lowers costs and ensures that there will be potentially less impact on the environment and on local communities and is reflected in the greater reliance on existing infrastructure upgrading.</p>		
<p>Development of Energy Scenarios</p> <p>The Grid IP 2017- 2022 has examined potential future needs of the grid through developing four energy scenarios. The Grid IP provides a framework to respond to as different scenarios may evolve in the future.</p> <p>This also allows for reviews to be carried out to assess which scenario is developing as the most appropriate for future adaptation.</p>	<p>The new Grid IP can provide a better framework to respond to as different scenarios may evolve in the future.</p> <p>This also allows for reviews to be carried out to assess which scenario is developing as the most appropriate for future adaptation.</p>	<p>Grid IP 2023-2028 provides a framework for coping with a range of different scenarios</p>



4. SEA CONCLUSION

The reasonable alternative evaluation presented in the preceding section resulted in the development of a Grid IP that achieves the best environmental outcomes in comparison to other reasonable alternative considered.

The adoption of the mitigation measures to be integrated into the Grid IP, in combination with the continued adoption of all relevant processes within the existing National Planning Framework (where applicable) will prevent, reduce and as fully as possible offset any potential negative environmental effects due to the implementation of the Grid IP. No further mitigation measures are required for the Grid IP.

With the adoption of the defined mitigation measures, the implementation of the adopted Grid IP will not result in any likely, significant, adverse environmental effects.



5. SEA MONITORING

The SEA Directive requires that the environmental effects of the implementation of a plan are monitored in order 'to identify at an early stage unforeseen effects, and to be able to undertake appropriate remedial action.'

A series of indicators and targets were established for identified SEOs to enable ongoing monitoring and measurement of Grid IP implementation performance, the environmental effects of the implementation of the Grid IP and the efficacy of environmental mitigation measures. Such monitoring will be carried out regularly to support plan implementation.

SEO indicators are simple and effective quantifiable indicators used to measure the environmental effects of implementing the Grid IP and the progress of SEO objectives and targets. SEO targets set focussed, measurable aims and thresholds that the Grid IP can support the achievement of.

EirGrid are responsible for implementation of the SEA monitoring programme. The environmental effects (including positive, negative and cumulative effects) of Grid IP implementation will be monitored once every year over the course of the plan's five-year lifetime. This monitoring will be carried out by the Environment section of EirGrid who will report on progress and performance to the relevant SPC annually. A monitoring report will be prepared to document monitoring outcomes. This report shall be made available for public inspection.

Where monitoring identifies that the implementation of the Grid IP is having a significant negative environmental effect, an in-depth review of the Grid IP should take place and the Grid IP should be updated in a manner that satisfactorily mitigates these environmental effects (i.e., through the adoption of additional environmental mitigation measures.). Similarly, where monitoring indicates that potential positive environmental effects associated with Grid IP implementation are not being adequately realized, the Grid IP should be reviewed and updated in a manner that supports the realization of all potential positive environmental effects, having regard to the overall vision and high-level objectives of the plan.

The SEA Monitoring Programme established for the Grid IP is contained in Table 5-1. This monitoring programme has been developed in accordance with EPA guidelines entitled 'Guidance on SEA Statements and Monitoring' (2020). The monitoring programme includes detail on the indicators, targets and data sources used to monitor and measure progress.

A stand-alone monitoring report on the significant environmental effects of the implementation of the Plan will be prepared annually through the plan life cycle. EirGrid is responsible for the ongoing review of indicators and targets, collating existing relevant monitored data, the preparation of monitoring evaluation report(s), the publication of these reports and, if necessary, the carrying out of remedial action.

EirGrid will regularly review and update the monitoring framework, as data gaps are identified, new data sources become available, or improved GIS, or other methods become available to more effectively determine indicator values.



Table 5-1: SEA Monitoring Programme (Revision 0 - September 2024)

Please note that to retain flexibility in the monitoring programme, any aspect below may be refined over time throughout the plan cycle					
Theme	Objective	Target	Indicator (No = None; # = Number)	Frequency of Monitoring Reports on EirGrid Website	Automated GIS or other analyses
All	O1: Ensure, where appropriate, that lower level plans and projects implement SEA mitigation and Plan policies and contribute to overall environmental monitoring processes within EirGrid .	O1_T1: All projects and plans implement SEA mitigation and Plan policies	O1_I1 # written communications from EirGrid Planning and Environmental Unit to EirGrid Network Project Office and other relevant departments identifying need to implement SEA mitigation and Plan policies. Source: EirGrid Planning and Environmental Unit. O1_I2 # Lower Tier Plans complying with SEA mitigation and Plan Policies. Source: EirGrid Planning and Environmental Unit.	Annually starting 2024, with final report in 2029	No
Population, Human Health & the Economy	PHH1: Minimise the proximity of development to residences in order to reduce actual and/or perceived environmental effects.	PHH1_T1: Noise levels emanating from grid development following commissioning, when measured externally at a noise sensitive location shall not exceed noise levels specified in planning conditions	PHH1_I1: No exceedances in noise levels specified in planning conditions Source: Project-level noise monitoring reports (where available in response to a condition requesting monitoring be carried out).	Annually starting 2024, with final report in 2029	No
		PHH1_T2: Ensure compliance with all authoritative international and	PHH1_I2: # projects complying with all authoritative international and national guidelines, with reference where relevant to EPA EMF monitoring data	Annually starting 2024, with final report in 2029	No



Please note that to retain flexibility in the monitoring programme, any aspect below may be refined over time throughout the plan cycle

Theme	Objective	Target	Indicator (No = None; # = Number)	Frequency of Monitoring Reports on EirGrid Website	Automated GIS or other analyses
		national guidelines for Extremely Low Frequency (ELF) EMF exposure.	Source: Written confirmation from EirGrid Technical Authority.		
		PHH1_T3: Avoid where possible routing of new overhead transmission line within 50m of existing dwellings.	PHH1_I3: GIS analysis: # existing dwellings within 50m of new overhead transmission line development. Source: OSI Prime 2 data.	Annually starting 2024, with final report in 2029	Yes
		PHH1_T4: Intersection of marine transmission infrastructure with range of fishing activities	PHH1_I4: GIS analysis: # fishing and aquaculture sites intersected by marine transmission infrastructure. Source: GIS Datasets (TBC 2024) following consultation with BIM, Marine Institute, EirGrid Fisheries Liaison Officer, and Seafood ORE Working Group.	Annually starting 2024, with final report in 2029	Yes
		PHH1_T5: Intersection of marine transmission infrastructure with range of inshore fishing activities	PHH1_I5: Total Available € for community fund projects reported in EirGrid Annual Report: PHH1_I6: Total € awarded to successful community fund projects under biodiversity stream. Source: EirGrid Public Engagement Team.	Annually starting 2024, with final report in 2029	



Please note that to retain flexibility in the monitoring programme, any aspect below may be refined over time throughout the plan cycle

Theme	Objective	Target	Indicator (No = None; # = Number)	Frequency of Monitoring Reports on EirGrid Website	Automated GIS or other analyses
Biodiversity, Flora & Fauna	B1: Ensure compliance with Habitats and Birds Directives with regard to protection of designated European Sites	B1_T1: Maintenance of favourable conservation status for all habitats and species protected under the Habitat Directive potentially affected by the implementation of the Grid IP.	BI_I1: # projects subject to Imperative Reasons of Overriding Public Interest (IROPI). Source: Project Documents filed internally in EirGrid, and EirGrid Planning and Environmental Unit:	Annually starting 2024, with final report in 2029	No
			BI_I2: # projects screened in for Appropriate Assessment Source: Project Documents filed internally in EirGrid, and EirGrid Planning and Environmental Unit:	Annually starting 2024, with final report in 2029	No
			BI_I3: # projects with new overhead line or underground cable infrastructure within Special Areas of Conservation or Special Protection Areas (onshore and offshore) Source: EirGrid TPD mapping of Capital Projects overlain by NPWS European site data.	Annually starting 2024, with final report in 2029	Yes
			BI_I4: # projects (new or existing overhead lines) with bird diverters proposed to reduce bird strike risk Source: EirGrid Planning and Environmental Unit GIS data on committed diverter retrofits	Annually starting 2024, with final report in 2029	No



Please note that to retain flexibility in the monitoring programme, any aspect below may be refined over time throughout the plan cycle

Theme	Objective	Target	Indicator (No = None; # = Number)	Frequency of Monitoring Reports on EirGrid Website	Automated GIS or other analyses
			BI_I5 Bespoke EirGrid Database Total length of overhead line spans on which retrofitted bird diverters are committed by EirGrid and ESB in CPP documents Source: EirGrid Planning and Environmental Unit GIS data on committed diverter retrofits	Annually starting 2024, with final report in 2029	No
	B2: Support Article 10 of the Habitats Directive with regard to ecological networks	B2_T1: No significant loss to ecological networks resulting from development provided for by the Grid IP.	B2_I1: Length of hedges/treelines (km) permanently removed, resulting in breaks to wildlife corridors (notwithstanding compensatory planting in other areas) Source: EirGrid Planning and Environmental Unit database on habitat loss across projects	Annually starting 2024, with final report in 2029	No
			B2_I2: No of hedges/treelines permanently removed, which are Part of 2 or 3 ecological networks, in NPWS Ecosystem Services Data (MAES15) Source: EirGrid Planning and Environmental Unit database on habitat loss overlain with NPWS Ecosystem Services Data (MAES15)	Annually starting 2024, with final report in 2029	Yes



Please note that to retain flexibility in the monitoring programme, any aspect below may be refined over time throughout the plan cycle

Theme	Objective	Target	Indicator (No = None; # = Number)	Frequency of Monitoring Reports on EirGrid Website	Automated GIS or other analyses
	B3: Avoid significant impacts on protected habitats, or species, or nationally designated sites	B3_T1: Avoid significant impacts on habitats, species or nationally designated sites	B3_I1: # and length of projects with new overhead line or underground cable infrastructure within Natural Heritage Areas or proposed Natural Heritage Areas (pNHAs), onshore and offshore. Source: EirGrid TPD mapping of Capital Projects overlain by NPWS European site data.	Annually starting 2024, with final report in 2029	Yes
			B3_I2: # projects with residual effects (post mitigation) on Important Ecological Features at geographic scale of County or above. Source: EirGrid Planning and Environmental Unit Database	Annually starting 2024, with final report in 2029	No
			B3_I3: # projects requiring translocation of rare or protected plant species, or habitats Source: EirGrid Planning and Environmental Unit	Annually starting 2024, with final report in 2029	No
	B4 Restore or enhance nature (including net habitat gain)	B4_T1: Deliver measurable gain in biodiversity	B4_I1 Bespoke EirGrid Database # of projects* demonstrating measurable gain in habitat area** *Excluding uprates, refurbishments, and projects entirely within existing substations **Habitats of Local Importance (Higher value) and above only	Annually starting 2024, with final report in 2029	No



Please note that to retain flexibility in the monitoring programme, any aspect below may be refined over time throughout the plan cycle

Theme	Objective	Target	Indicator (No = None; # = Number)	Frequency of Monitoring Reports on EirGrid Website	Automated GIS or other analyses
			B4_I2 Bespoke EirGrid Database Cumulative total net change in habitat area from relevant projects*	Annually starting 2024, with final report in 2029	No
			B4_I3 Bespoke EirGrid Database # of offshore transmission projects with nature inclusive design features	Annually starting 2024, with final report in 2029	No
Landscape & Visual Amenity	L1: Avoid or, minimise impacts to statutory landscape and seascape designations,	L1_T1: No avoidable impacts on the landscape or seascape	L1_I1: GIS analysis # overhead line projects, or offshore substations with within 1km of a) scenic routes and b) scenic viewpoints	Annually starting 2024, with final report in 2029	Yes
			L1_I2: GIS analysis # offshore transmission projects interacting negatively with seascape character areas	Annually starting 2024, with final report in 2029	Yes
Cultural Heritage - Archaeology & Architectural	CH1: Avoid or minimise impacts upon archaeological heritage sites	CH1_T1: # projects resulting in significant long-term impacts to entries in the RMP	CH1_I1: GIS analysis # projects intersecting Zone of Notification for cultural heritage sites	Annually starting 2024, with final report in 2029	Yes
			CH1_I2: GIS analysis # marine transmission projects intersecting Recorded shipwrecks (including INFOMAR data)	Annually starting 2024, with final report in 2029	Yes



Please note that to retain flexibility in the monitoring programme, any aspect below may be refined over time throughout the plan cycle

Theme	Objective	Target	Indicator (No = None; # = Number)	Frequency of Monitoring Reports on EirGrid Website	Automated GIS or other analyses
Geology and Soils	GSL1: To avoid or minimise effects designated geological sites	GSL_T1: No significant long-term impacts on designated geological heritage sites	GSL1_I1: GIS analysis # projects intersecting designated Geological Heritage sites (geological Natural Heritage Areas, audited County Geological Sites)	Annually starting 2024, with final report in 2029	No
	GSL2: Implement relevant actions from the EU Soil Strategy for 2030	GSL2: No projects failing to Implement relevant actions from the EU Soil Strategy for 2030	GSL2_I1: # wetlands from Wetlands Surveys Ireland database lost to grid development projects GSL2_I2: # contaminated sites remediated in the course of developing grid development projects	Annually starting 2024, with final report in 2029	Yes No
Land use	LU1: To avoid or minimise effects on existing land and marine use.	LU1_T1: No avoidable impacts on the landuse resulting from development provided for by the Grid IP.	LU1_I1: Project Documents Area of land-use change predicted from substation development following mitigation	Annually starting 2024, with final report in 2029	No
Water	W1: Maintain and/or improve, the quality and status of surface waters, including supporting for the objectives for the Draft Third Cycle River	W1_T1: No deterioration in the status of any surface ground water or affect the ability of any surface ground to	W1_I1: Change in Overall WFD Status for surface and groundwater (comparison before Draft IP, and after Draft IP)	2029 only, when pre-IP WFD data (2016-2021; released 2022) can be compared with plan cycle data (2022-2027; released 2025)	Yes



Please note that to retain flexibility in the monitoring programme, any aspect below may be refined over time throughout the plan cycle

Theme	Objective	Target	Indicator (No = None; # = Number)	Frequency of Monitoring Reports on EirGrid Website	Automated GIS or other analyses
	Basin Management Plan (2022-2027) where relevant and appropriate	maintain or achieve 'good' status.	W1_I2: GIS analysis Area of new substation or underground cable development in areas of extreme or high groundwater vulnerability	Annually starting 2024, with final report in 2029	Yes
			W1_I3: GIS analysis Area of new substation or underground cable development intersecting GSI Groundwater wells and springs	Annually starting 2024, with final report in 2029	Yes
Material Assets & Infrastructure	MAI1: Avoid or minimise effects on built/amenity assets and infrastructure.	MAI1_T1: To minimise impacts on farming practices.	MAI1_I1: GIS analysis Area of Good Agricultural Land lost to permanent infrastructure	Annually starting 2024, with final report in 2029	Yes
			MAI1_I2: GIS analysis # of High Density Commercial and transport routes intersected by offshore transmission routes	Annually starting 2024, with final report in 2029	Yes
Tourism & Recreation	TR1: Minimise effects upon the tourism and recreation amenities.	TR1_T1: No significant impacts on tourism and recreation amenities.	TR1_I1: GIS analysis # tourist sites* within 500m of significant new infrastructure *Failte Ireland Tourism Designations and OPW Visitor Sites	Annually starting 2024, with final report in 2029	Yes



Please note that to retain flexibility in the monitoring programme, any aspect below may be refined over time throughout the plan cycle

Theme	Objective	Target	Indicator (No = None; # = Number)	Frequency of Monitoring Reports on EirGrid Website	Automated GIS or other analyses
			TR1_I2: GIS analysis # intersections of new infrastructure projects with designated walking trails		
			TR1_I3: GIS analysis # blue flag beaches intersected by marine transmission infrastructure	Annually starting 2024, with final report in 2029	Yes
Climate Change	CC1: Help to facilitate the achievement of higher level government targets for delivery of renewable energy in latest Climate Action Plan	CC_T1: Contribute towards an increase in electricity generation from renewable energy (ultimately up to 80% by 2030).	CC_I1: EirGrid Annual Report Percentage electricity generation from renewable energy reported in EirGrid Annual Report CC_I2: EirGrid Annual Report # of projects in Annual Transmission Development Plan CC_I3: EirGrid Annual Report MW Capacity Energized CC_I4 EirGrid Annual Report Connection Projects?	Annually starting 2024, with final report in 2029	Yes



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