

The Grid Link Project

Consultation Report No.1 (12th April – 8th June 2012)

Prepared for EirGrid by RPS Group
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1 EXECUTIVE SUMMARY

This report sets out the process for the first round of public consultation for the Grid Link Project.

EirGrid launched the project and the first phase of public consultation on the 12th of April 2012. The focus of the first consultation was the proposed study area and the identification of constraints. The consultation lasted for an eight week period and concluded on the 8th June 2012.

Section 1 of this report sets out the activities undertaken to ensure widespread awareness of the project. This was achieved through a combination of media (press releases, media interviews etc); advertising (both in print and on radio); direct communication with stakeholders (approximately 5,000 stakeholders / organisations were contacted directly about the project) and online via the EirGrid website (over 3,000 unique visitors during the public consultation period).

It also details the consultation activities including opening four information centres in the study area; hosting eight open days; specific stakeholder meetings and briefings; online information and consultation.

Section 2 of the report sets out the feedback raised by stakeholders during the consultation process. The issues are summarised under a series of topics that relate to constraints, developing project corridors, consultation and communications and other issues.

SECTION 1

PROJECT BACKGROUND AND PUBLIC CONSULTATION ACTIVITIES

2 INTRODUCTION

2.1 BACKGROUND

2.1.1 The Grid Link Project

The Grid Link Project represents a significant upgrade of the electricity grid and involves the construction of a new power line linking Leinster and Munster. Based on assessments to date, EirGrid has determined that in order to best meet the needs of the south and east, the optimum solution is the construction of a 400 kV Alternating Current (AC) overhead line linking Cork and Kildare via Wexford. In developing the Grid Link project EirGrid will review its technology assumptions at key stages throughout the project to ensure they remain valid.

The Grid Link Project is a vital development for these regions that will deliver a wide range of benefits, which include:

- Securing future electricity supply for homes, businesses, farms, factories and communities;
- Helping empower growth in the south and east of Ireland;
- Helping Ireland to meet its target of 40% electricity from renewable sources.

EirGrid has established a dedicated project team to develop a route and substation sites for the Grid Link Project. EirGrid does not expect to submit an application to An Bord Pleanála for planning approval before 2015 and public consultation will form an important part of all stages of the project over the coming years.

2.1.2 Project Development – Overview

EirGrid is open to engaging with the public and other interested parties on all aspects of the project at anytime. EirGrid has developed and published an Approach to the development of Electricity Transmission Infrastructure, which can be found in appendix A.

Figure 2.1 Road Map



Ongoing engagement is undertaken through the network of four information centres open throughout the study area. However, there are critical points in the development of any project where key decisions are made. In addition to the ongoing engagement, EirGrid has introduced structured consultation where feedback from the public is gathered and taken into account as part of the project decision-making process. These periods of consultation are described as follows:

Consultation 1 - EirGrid Project Development & Consultation Road Map – Stage 1- Identify Study Area



Consultation 1 involved identification of the study area, or the area within which the project will be located. The study area is indicated as the area enclosed by the red line on the map adjacent.

EirGrid asked the public and all interested parties to:

- Comment on the proposed study area map;
- Identify constraints that should be considered for further review;
- Provide feedback on how corridors should be developed.

Feedback gathered during Consultation 1 was reviewed and considered by the project team. The findings of this consultation are recorded in this document and were used to help establish the study area and develop the Constraints Report.

Consultation 2 - EirGrid Project Development & Consultation Road Map - Identify Environmental & Other Constraints



In consultation 2, the public and all interested parties will be asked to:

- Comment on the proposed Constraints Report;
- Provide feedback on how EirGrid should develop corridors for the project.

Feedback from this consultation will be recorded and used by the project team to compile a full list of constraints and enable the identification of corridors within the study area.

Consultation 3 - EirGrid Project Development & Consultation Road Map – Stage 1 Identify feasible options



In Consultation 3 EirGrid will outline the corridors for the Grid Link Project.

The public and all interested parties will be asked to:

- Comment on the corridors identified; and
- Provide feedback on the criteria that should be used to determine a least constrained corridor.

The feedback from Consultation 3 will be used by the project team to facilitate the evaluation of corridors and identify the least constrained corridor for further consideration.

Consultation 4- EirGrid Project Development & Consultation Road Map Stage 2 Identification of least constrained option



Consultation 4 will focus on the least constrained corridor and the indicative line route within it. The indicative line route is the proposed route for the project based on the information available at the time.

EirGrid will be asking the public and all interested parties to comment on the least constrained corridor and indicative line route.

Feedback from Consultation 4 will be used to finalise the route alignment.

Once the route alignment has been finalised, the project team will consult with landowners on the indicative line route and undertake an Environmental Impact Assessment (EIA), which will form the basis of a planning application that will be submitted to An Bord Pleanála for approval

The Grid Link Project: Public Consultation No. 1

2.2 TERMS OF REFERENCE

This first stage of public consultation focused on the proposed study area and on the identification of constraints. It was launched by the Minister for Communications, Energy and Natural Resources Pat Rabbitte, T.D. and ran for an eight week period, from Thursday 12th April to Friday 8th June, 2012.

Public Consultation No. 1 was a non-statutory¹ public consultation that provided all interested individuals and organisations with an opportunity to feed into the early development of the project.

Consultation 1: Terms of Reference

- Comment on the proposed study area map: Has EirGrid considered all relevant criteria when determining the study area? Should anything else have been considered?
- Identify constraints that should be considered for further review: Are you aware of any locally or regionally important features that you believe should be considered as the project develops?
- Provide feedback on how corridors should be developed: How should constraints or features in the landscape be taken into account when corridors are defined for the project?
- Any other issues? If you have any other issues that you think should be taken into account at this stage of the project EirGrid would welcome your input.
- How would you like to be involved or communicated with, as the project progresses?

The closing date for consultation 1 was 5:00 p.m. on Friday, 8th June 2012. However, submissions from interested parties on any aspect of the project are welcome at anytime. All views submitted to the project will be recorded and considered by the project team.

¹ Statutory consultation occurs when a project developer submits a planning application, in this case to An Bord Pleanála. All consultation that occurs outside of this period is non-statutory. There is no definition for non statutory consultation in Irish law but it is recognised as a key process in the delivery of projects.

Submissions and feedback, as well as all of the communications activities undertaken as part of the first public consultation have been summarised in this report. The feedback given to EirGrid during the consultation period is summarised in Section 2. The Grid Link project team have undertaken a full review of submissions.

2.2.1 Proposed Study Area

The following information was presented to the public and other interested parties at the start of the consultation:

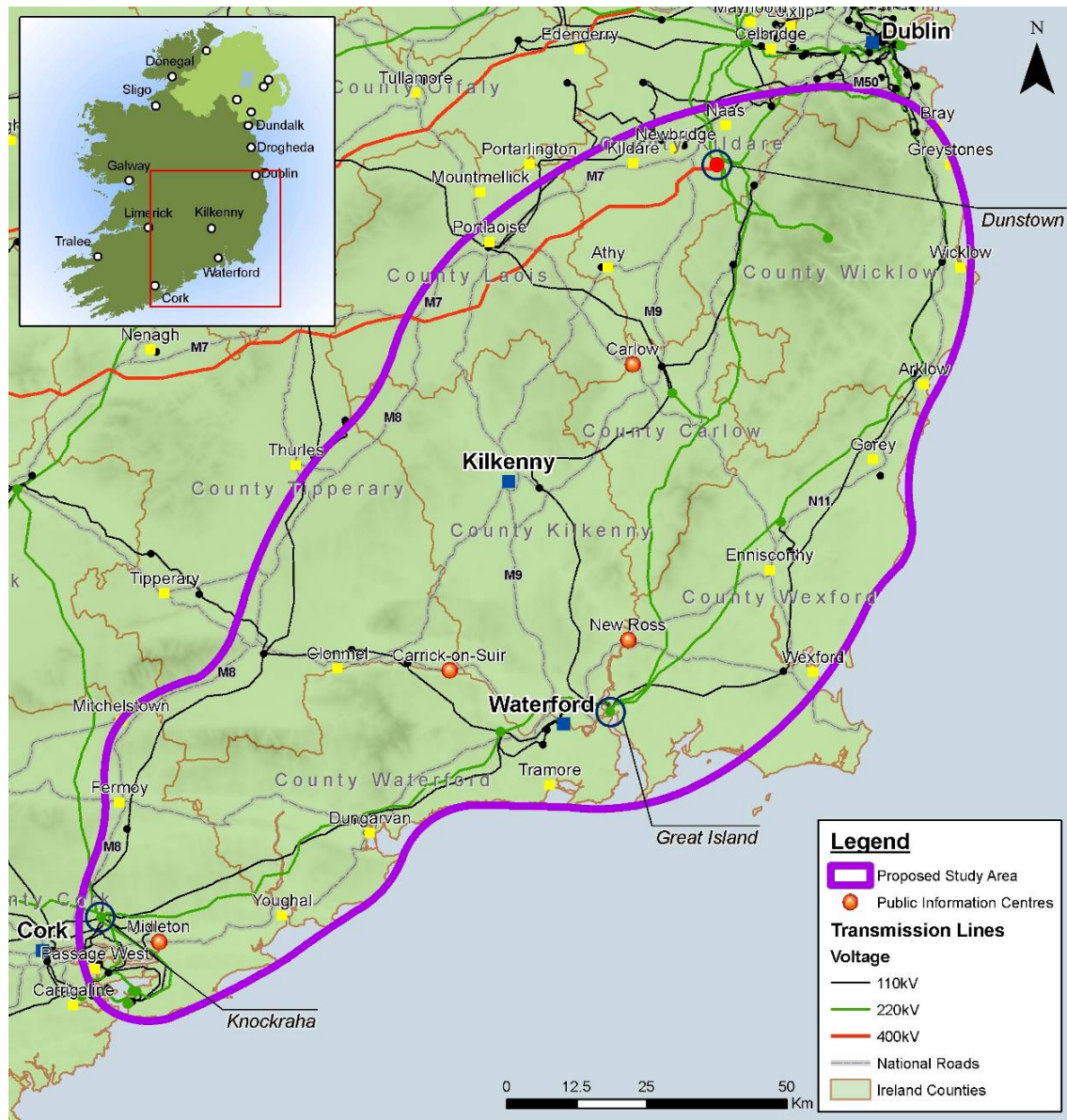
To identify the appropriate study area for the Grid Link Project it was necessary to start where the new link can connect to the existing grid. Based on EirGrid's assessments to date, the optimum connection points (i.e. transmission substations) on the grid have been identified as Knockraha in County Cork; Great Island in County Wexford; and Dunstown near Naas in County Kildare.

The connection points have been chosen because these substations are capable of integrating the electricity carried on the proposed new 400 kV link into the existing electricity grid. They are also geographically well-positioned to meet the strategic needs of the network development.

The study area needs to be large enough to encompass the strategic objectives and drivers of the project, including the three connecting points of Knockraha, Great Island and Dunstown. It broadly follows significant jurisdictional or physical boundaries (e.g. motorways, the coastline, or administrative boundaries).

For full details of the Proposed Study Area please see ***The Grid Link Project Study Area Paper*** (<http://www.eirgridprojects.com/media/April2012StudyAreaPaper.pdf>)

Figure 3.1 Proposed Study Area Map



2.3 CONSULTATION METHODOLOGY

A range of communications tools were used in an attempt to facilitate as many people as possible. This involved organising public events, a full time project team presence within the study area, special briefing meetings as well as a phone line and online / traditional postal opportunities.

2.3.1 Information Centres

As part of the public involvement process for The Grid Link Project, a network of four information centres was opened the week following the launch of the project. These centres were opened to:

- Enable the provision of information to project stakeholders throughout the project's proposed study area;
- Provide a local facility for meetings with stakeholders within the study area;
- Provide a 'drop-in' service for members of the public.

The locations for the centres were selected based on the need to provide the widest possible geographical spread throughout the proposed study area. Safe, easy access for the public, access to the road network and avoidance of the centre of major urban areas and large towns (owing to traffic congestion) were also considered.

The Grid Link information centres were opened in Midleton, Co. Cork, Carrick-on-Suir, Co. Tipperary, New Ross, Co. Wexford and Carlow Town, Co. Carlow during the first week of Consultation 1. The map in Appendix B shows the locations of each information centre. The centres were chosen to provide an evenly distributed geographic spread within the study area, allowing for equal access to stakeholders throughout the area.

The approach taken was to locate each information centre in a reasonably sized population centre, to facilitate access for members of the public and other interested parties. In addition, consideration was given to the quality of the road network and availability of parking at each centre and offices were chosen with this in mind.

In considering the location and facilities of each office, there was a need to ensure that the best balance was chosen across the study area from the options available to the project team.

As the project progresses, the locations of the centres will be reassessed to ensure the network is best serving the needs of the project's stakeholders.

The information centres are staffed by two appropriately qualified personnel who are available to meet with anyone who wishes to visit the centre during the advertised opening hours. If anyone wishes to meet the project team outside of these hours, every effort is made to accommodate that request.

The information centre locations and opening hours are set out in Table 3.1 below.

Table 3.1 Information Centre locations and opening hours

Centre	Address	Opening Hours
The EirGrid Middleton Information Centre	Oikoseen House, Castleredmond, Middleton, Co. Cork	Open every Monday from 12 noon to 6pm
The EirGrid Carrick-on-Suir Information Centre	Carrick Community Business Centre at the Nano Nagle Centre, Carrick-on-Suir, Co. Tipperary	Open every Tuesday from 12 noon to 6pm
The EirGrid New Ross Information Centre	The Coach House, Marsh Lane, New Ross, Co. Wexford	Open every Wednesday from 12 noon to 6pm
The EirGrid Carlow Information Centre	Enterprise House, O'Brien Road, Carlow, Co. Carlow	Open every Thursday from 12 noon to 6pm

* Note: Project Information Centres are closed on bank holidays,

2.3.2 Open Days

In order to provide a focus for engagement, a series of open days was hosted during the consultation period. Expertise from across the Grid Link Project team was available at each open day, including technical and environmental specialists, to engage with members of the public and answer any queries or questions that might arise.

A series of tailored information displays was prepared by the project team for the events. The displays focused on explaining:

- The role of EirGrid;
- The Irish national electricity grid;
- What the Grid Link Project involves;
- The process associated with route identification;
- The project's consultation process;
- The project time line;
- Constraints and;
- The study area.

The open day display materials are included in this report in Appendix C.



The format of the open day encouraged stakeholders to visit the venue from 1pm 8pm. Members of the project team explained the displays, answering any questions that arose and recording feedback as it was given. Experts in a number of fields including technical design, agronomy and ecology were available at all open days. Appendix D shows the form used by project team members to capture feedback at open days.

The details of each of the open days held during Consultation No. 1 are outlined below in Table 3.2. Appendix B shows on a map the locations of each open day held as part of the consultation.

Table 3.2 Public Consultation No. 1: Open Day venues, dates and times.

County	Venue	Date and Time
Cork	Midleton Park Hotel, Midleton	Wednesday, 2nd May 2012, 1:00 p.m. to 8:00 p.m.
Waterford	The Granville Hotel, Waterford	Tuesday, 8th May 2012, 1:00 p.m. to 8:00 p.m.
Kildare	Killashee House Hotel, Naas	Thursday, 10th May 2012, 1:00 p.m. to 8:00 p.m.
Tipperary	Clonmel Park Hotel, Clonmel	Friday, 11th May 2012, 1:00 p.m. to 8:00 p.m.
Kilkenny	Kilkenny Ormonde Hotel, Kilkenny	Tuesday, 15th May 2012, 1:00 p.m. to 8:00 p.m.
Cork ²	Knockraha Community Centre, Knockraha	Thursday 17 th May 2012, 8.30 p.m. – 11:00 p.m.
Wicklow	Druids Glen, Newtownmountkennedy	Tuesday, 22nd May 2012, 1:00 p.m. to 8:00 p.m.
Wexford	Talbot Hotel Wexford, Wexford	Wednesday, 23rd May 2012, 1:00 p.m. to 8:00 p.m.

2.3.3 Print Materials

Printed information materials were produced for Consultation No. 1 to ensure stakeholders had adequate access to project information. These materials were produced in addition to the existing body of EirGrid corporate printed materials that include information on what EirGrid is, how the national grid is operated and developed, the Grid25 programme and other EirGrid materials. A series of printed materials was produced for this stage of the Grid Link Project consultation as follows:

- Information Brochure 1;
- Consultation Brochure 1;
- Consultation No. 1 Poster.

² A series of seven open days was initially envisaged for Consultation No. 1 however, following engagement with members of the community at Knockraha, Co. Cork, EirGrid responded to requests from the local community to facilitate an information session at Knockraha Community Hall.

Information Brochure 1 contained information about EirGrid, the project background, the need and benefits of the project, the proposed study area (including full page map), how the project will be developed, the consultation process, contact details and means of communications with the project team and what EirGrid is consulting on during Consultation No. 1.

A second brochure, entitled Consultation 1, was produced as an insert to Information Brochure 1. This contained a full page feedback form to facilitate written submissions to the project team. This brochure also contained information on the Grid Link Project, the issues being consulted on and details for how stakeholders can get involved in the consultation process.

The poster produced for Consultation No. 1 included an outline of the project, a map of the study area and contact details of the project team. The focus of the poster was to promote the dates, times and venues of the planned open days to be held throughout Consultation No. 1.

Appendix E contains samples of all of the above printed materials.

2.3.4 Online

A dedicated page for the Grid Link Project was established on the 'Projects' section of the EirGrid corporate website and extensive information on the project was made live on the website on the day of the project launch. All relevant project information, including electronic versions of the project literature was made available online. The URL for the project website is www.eirgridprojects.com/projects/gridlink. Appendix F contains screen grabs of the information made available on-line during the consultation.

In addition to the project website, members of the public were invited to submit feedback to the project team via the project email address: gridlink@eirgrid.com

2.3.5 Information Service

A comprehensive information service was established to facilitate stakeholders making contact with the project team to ask questions or receive information about any aspect of the project. This service is managed by appropriately qualified personnel who respond in a timely manner to any information request from members of the public.

The information service (which includes the Information Centres for face to face meetings) can be availed of through the project phone line (Lo-call 1890 422 122); online at gridlink@eirgrid.com or via traditional mail at: The Grid Link Project Manager, EirGrid, P.O. Box 12 213, Glenageary, County Dublin, Ireland.

2.3.6 Specific Stakeholder Engagement

2.3.6.1 Senators, TDs and MEPs

In recognition of the mandate given to elected representatives and the critical role they play in representing the public and the public interest, Senators TDs and MEPs were identified as a priority.

On the day of the project launch all Senators, TDs and MEPs in the study area were issued with a briefing pack that contained:

- Brochure introducing the project;
- Brochure introducing the public consultation process;
- Poster advertising the planned public consultation events;
- Letter introducing the project and inviting them to attend a special one-to-one briefing.

A briefing for Senators, TDs and MEPs was held in Buswells Hotel, Dublin 2 on Wednesday 25th of April 2012. Members of the Oireachtas and European Parliament were sent written invitations offering one-to-one briefings on the project at a time of their choosing over the course of the day.

Each letter was followed up with phone calls encouraging attendance at the event. The event was held between 9 a m and 6 pm. In total this event was attended by 22 elected members and their representatives who raised a range of issues regarding all aspects of the project.

2.3.6.2 County & City Councils

As part of the project launch, all local elected representatives were issued with a briefing pack about the project by both email and by traditional mail. This briefing pack contained:

- Brochure introducing the project;
- Brochure introducing the public consultation process;
- Poster advertising the planned public consultation events;
- Letter introducing the project and inviting them to attend the Information Centres and/or the Open Days.

All Councils in the study area were also contacted and a request was made that the Grid Link Project team be placed on the agenda to make a presentation to each of the fifteen local authorities in the study area. These meetings are currently underway.

2.4 PUBLICISING THE CONSULTATION PROCESS

Raising awareness of the project and encouraging participation in the public consultation was a key aspect of the work undertaken by the Grid Link team in this phase. The definition of the study area and the mapping of constraints are critical activities that influence the selection of the corridors for the project. Therefore it was very important that every effort was made to ensure that as many people as possible were made aware of the project and had an opportunity to participate in the public consultation.

This was achieved through a combination issuing news releases to national and local print, broadcast and electronic media, placing advertisements in local and national press and local radio stations, directly to stakeholders and on-line on the EirGrid website;

2.4.1 Media

In order to maximise the opportunity for media coverage, the public consultation was launched at a high profile media event where Minister Pat Rabbitte, T.D. launched the project and encouraged people to participate in the consultation process. The event was very well attended by both national and local media and generated extensive coverage for a number of weeks following the event.

The media coverage of the public consultation is extensive and is summarised in Table 3.3 below. The media coverage (print, radio, TV and on-line) and advertisements for the consultation events are listed in Appendix G.

Following on from the launch EirGrid issued a series of news releases to local media promoting the project activity – see Appendix H for list of news releases.

Table 3.3 Summary of media coverage during the first public consultation period

Separate pieces of coverage	Media	Date (2012)
7	National Television news bulletins	12 th April
18	National Radio bulletins	12 th April
15	Local radio interviews	12 th April - 23 rd May
13	National newspaper articles	12 th April - 20 April
3	National newspaper advert	16 th April - 17 th May
64	Local print media articles	12 th April - 6 th of June
46	Local print media adverts	17 th April - 17 th May
147	30 second local radio adverts	23 rd April - 23 rd May
53	Online news articles	12 th April - 8 th June

2.4.2 Sectoral Stakeholders and Community Leaders

Media plays a crucial role in publicising the project and the consultation events; however efforts were made to directly contact stakeholders. Once the Proposed Study Area was identified, EirGrid sought to contact individuals or groups who might have an interest in making a submission or who might disseminate information about the project to their members / community.

Sectoral and Community stakeholders were issued with project information if they fell into one of the following categories:

- 1) Information about the project would be of interest to them;
- 2) Their participation in the public consultation was important;
- 3) They had the potential to disseminate project information to their own contacts locally.

Stakeholder groups and community leaders from the following sectors were identified:

- Agriculture;
- Environment;
- Elected Representatives;
- Community Organisations;
- Business Organisations;
- Statutory / Strategic Stakeholders.

Contact information for these groups was obtained from publicly available sources including websites and telephone directories. It is recognised that the stakeholder list compiled for this first consultation requires constant updating as the project progresses.

During the week of the project launch approximately 5,000 sectoral stakeholders and community leaders were issued with a letter, a project brochure, a consultation brochure and a project poster. These stakeholders included all elected representatives, schools, third level colleges, NGO's, sports clubs, community groups, County Librarians, EIA Guidance Consultees, Local Authorities, Local Groups, health centres, religious leaders, etc.

Following the launch of the project, County Librarians in each local authority within the project study area were contacted and asked to display printed information materials in each public library throughout the study area. Approximately 2,000 brochure sets (Information Brochure 1, Consultation Brochure 1, Consultation No. 1 Poster – see Section 3.2.3) were distributed throughout the public library networks of the 15 Local Authorities within the project study area in the first two weeks of the public consultation.

2.4.3 Information Centres

Every opportunity to publicise the consultation events was used by the team working in the Information Centres. Posters were displayed in each town advertising the open days and information centres locally and the project communications team discussed the project with staff in the post offices, newsagents, community centres and public libraries. The communications team also delivered information brochures to the local authority offices in each of the towns and informed the local authority staff about the project and asked that they would direct any queries to the Grid Link project information centres.

2.4.4 Website

The EirGrid website was updated on the day of the launch and all of the project information was made available online. During the eight week consultation period, over 3,000 unique visitors logged onto the project website to access information.

2.5 PARTICIPATION IN THE CONSULTATION

The number of submissions received from stakeholders who participated in this first round of the consultation process is detailed in Table 3.4 below.

Table 3.4 Participation Numbers

Methods of Stakeholder Feedback	Number of Submissions³
Information Centres	54
Telephone	71
Letter	17
Email	108
Open Days	255
Briefings	22
TOTAL	527

³ These figures represent the number of submissions made through each of the engagement methods. It does not reflect the total number of stakeholders who engaged during the process as some stakeholders engaged to gather information and made no submission (and are not counted above) while other stakeholders made more than one submission and they are counted individually.

SECTION 2

CONSULTATION FEEDBACK

3 CONSULTATION FEEDBACK

EirGrid is very grateful to stakeholders who took the time to make a submission at this early stage in the Grid Link Project. The Grid Link team have reviewed all feedback from stakeholders and this feedback will be used to establish the study area and develop the Constraints Report.

The following section sets out the views, opinions and issues raised by stakeholders who participated in the consultation. The opinions and views set out in the following sections are those expressed by stakeholders who participated in the consultation and do not necessarily reflect the opinions or views of EirGrid.

All submissions made by stakeholders either in writing, on-line, at the Information Centres, at the Open Days or over the phone have been recorded, logged and reviewed by the project team and are summarised in the following sections. This full report, together with the complete submissions, will be further reviewed by the wider Grid Link project team (including the relevant technical specialists).

As this is a non-statutory consultation the personal details of consultees and the submissions that they have made to EirGrid have not been published.

For the purposes of this report the issues have been grouped having regard to the Terms of Reference for the consultation (See Section 3.1). Each section below contains a summary of the broad issues raised and where appropriate, there is list of the specific constraints identified by stakeholders.

3.1 FEEDBACK FROM STAKEHOLDERS ON PROPOSED STUDY AREA

Some concerns were raised about the size and nature of the study area. Some stakeholders commented that the proposed study area appeared to be overly large given the fact that (in the opinion of that stakeholder) the proposed route is generally along the East Coast.

Questions were raised regarding why some counties were included at all. Some felt that County Laois should have been left out of the study area as it was too far west of where it was believed the project should be built.

Other stakeholders raised concerns that the study area is too restrictive and that it should also cater for offshore options for the development of the project. Concerns were raised that the study area was chosen to facilitate merging other grid development projects with Grid Link.

3.2 FEEDBACK FROM STAKEHOLDERS ON CONSTRAINTS

Stakeholders raised many issues regarding constraints. The feedback from stakeholders on constraints has been divided into the following categories which are in alphabetical order:

- Agriculture and Bloodstock;
- Archaeology, Architecture and Cultural Heritage;
- Biodiversity and Ecology;
- Community;
- Existing or Planned Infrastructure;
- Landscape and Visual Impacts;
- Strategic Constraints;
- Terrain;
- Tourism.

3.2.1 Feedback from Stakeholders on Agriculture and Bloodstock

The general point was made that prime agricultural land should not be spoilt. How the project might impact on livelihoods of farmers and a wide range of enterprises were highlighted including forestry, tillage, livestock and dairy farming.

A number of stakeholders raised concerns about the potential for loss and/or limitations of agricultural lands due to the locations of pylons. Their concerns included severance of farms where access is of key importance, in particular on dairy farms where cows need to be able to get to and from the farmyard on a daily basis. Stakeholders also raised the potential effects on tillage farming, in particular the implications for farmers no longer being able to use machinery under the pylon structures was raised as a concern.

A separate submission raised concerns over the impact to livestock and horses from noise and vibrations. Concern was expressed as to how the project would impact bloodstock at the Curragh in Co. Kildare throughout Co. Tipperary and in other places throughout the study area.

One submission requested that the impact of magnetic fields associated with pylons on crops of potatoes be investigated.

3.2.2 Feedback from Stakeholders on Archaeology, Architecture and Cultural Heritage

A number of submissions commented on the presence of archaeology, architecture and cultural heritage sites within the proposed study area (including high crosses, passage tombs, industrial archaeology, demesnes and gardens) and questioned whether the presence of such features would result in the transmission lines avoiding those areas.

The following are the specific constraints highlighted by stakeholders as being important:

The archaeological features and listed buildings that were protected during the development of the M9 motorway should be afforded the same level of protection for this project.

The land near Ahenny, Co. Tipperary was re-zoned to prevent wind turbines. This was done not just for reasons of visual impact but also because of local archaeology in the area e.g. passage tombs.

Detailed submissions were received regarding the Castletown area in Co. Carlow. Issues raised included architecture, tourism and ecology. In particular it includes a Dan Robertson Gothic Revival Tudor Castle; there is extensive wildlife including very rare and old tree specimens that are of interest

to the Tree Council and others. The entire area, for many reasons (cultural, historical, ecological) should be considered a constraint and avoided.

One stakeholder commented that behind the existing power line coming out of Great Island, Co. Wexford (towards Cork) – the woods adjacent to the line are protected and there is quite a lot of archaeology in that area.

The Slob Lands north of Wexford town contain the burial site for St. Ibar.

The Ahenny High Crosses, Co. Tipperary, Knockroe Passage Tombs, Co. Kilkenny and Sliabh na mBan, Co. Tipperary are all constraints to be avoided.

The range of historical monuments in the Glenasmole Valley have been protected by families and landowners for centuries and should be considered.

The rath (fort) located at the top of the hill at Mullaghreelan Forest Park, Co. Kildare; 9 counties are visible from the spot.

Kilcrea Castle, Co. Cork, the Heritage site at Graignamanagh, Co. Kilkenny, the archaeology at Ballyneaty, Co. Tipperary, were all identified as important by stakeholders.

Old Church, Sheepstown, Co. Kilkenny, a 12th century settlement, is located near the Knocktopher exit of the M9 but the motorway is located within 100m. This creates an over-burdening of the area.

Mount Leinster is now becoming an important place for religious worship with mass held there regularly.

Some submissions indicated that mapping of key constraints should include the Record of Protected Structures, NIAH Garden Survey, National Monuments and Architectural Conservation Areas.

One submission indicated that the guidance notes for appraisal of Historic Gardens, Demesnes, Estates and their setting published by Cork County Council should be referenced when the project team considers cultural heritage constraints.

3.2.3 Feedback from Stakeholders on Biodiversity and Ecology

A number of submissions indicated the requirement to avoid coastal areas, wetlands, designated sites and protected habitats and one submission in particular indicated the need to recognise the importance of near shore wetlands for birds, butterflies and bats (i.e. Bannow Bay cSAC). Another submission noted the importance of protecting the River Barrow and River Nore cSAC, noting that these may be crossed by the proposed transmission line in certain locations. The importance of Mount Brandon as a cSAC was also highlighted by stakeholders.

A number of individuals raised concerns regarding impacts to wildlife and in particular potential impacts to bats from the proposed transmission lines. One stakeholder stated that there is a need to use the most up-to-date information and research on bats when assessing biodiversity and ecology.

One submission indicated that bats and birds are known to breed in Castletown Castle in County Carlow. In addition to bats there are also numerous flora species in the vicinity of Castletown Castle in County Carlow. The importance of Castletown stream for birds including herons and kingfisher was also raised.

There are also 600 yr old trees in the vicinity of Castletown which are measured by the Tree Council of Ireland every two years. The trees are also sampled for DNA by Trinity College Dublin to investigate why they have survived so long. The trees are part of a working farm and contain important vistas and bird species (including Red Kites and Barn Owl's).

A number of submissions made comments on the inclusion of rivers containing Freshwater Pearl Mussel within the river catchment in the constraints study and raised the potential impacts on these during construction.

Stakeholders advised that the area between Tramore and Dungarvan, along the copper coast, which is already designated an SAC, is home to the Chuff bird. Wind farms were previously refused planning permission in this area as a result.

Another specific issue raised was two pairs of buzzards in the Foxborough area around Kilmacanogue, County Wicklow.

One submission requested confirmation that the project will be undertaken in compliance with the Habitats Directive and the requirement for Appropriate Assessment.

In addition it was requested that the following issues are addressed throughout the project programme: the potential impacts to Annex 1 habitats, potential impacts to protected flora and fauna (i.e. Marsh Fritillary Butterfly near Dunstown, Co. Kildare), potential impacts of EMF on salmon

migration and Sea Lamprey and possible impacts to sharks and elasmobranchs where estuary crossings maybe required, loss of hedgerows and potential impacts to bats and birds (including collision risks).

3.2.4 Feedback from Stakeholders on Community

From the community perspective a wide range of constraints and concerns were raised by stakeholders about the project.

A number of stakeholders identified densely populated areas as a key constraint in the study area that should be avoided at all times.

A number of stakeholders raised concerns about how the project will affect property and in particular, how this will be evaluated as part of the project. Others requested that one-off houses throughout the area should be considered a constraint and suggested that distance from dwelling houses should be maximised along the line. Other stakeholders noted that something should be done to compensate people who live directly adjacent to the project but do not have pylons on their land.

Stakeholders also suggested that community gain should be considered – especially around the substation sites.

Stakeholders raised a wide range of concerns about potential health impacts and this was a recurring issue throughout the public consultation.

Stakeholders requested that health impacts associated be fully assessed, including geopathic stress. Other stakeholders felt that health impact assessments should not be limited to physical health impacts but issues like depression should also be factored in.

Stakeholders also noted that the project and the process for developing the project, whereby it was felt the development will be 'imposed' on communities, was also a source of stress and anxiety for communities.

A number of submissions raised specific concerns over EMF levels associated with transmission lines and the potential health effects on people and animals. In particular stakeholders raised concerns about magnetic fields and possible links to cancer.

One stakeholder advised that in their experience some high voltage power lines in the study area interfere with radio signals.

The impact of substations on local communities was also raised as a concern by number stakeholders. Their concerns included noise impact, visual impact, property devaluation and cumulative impacts. Stakeholders advised that baseline studies should be taken to assess how existing infrastructure is impacting on local environment and that should be used to inform decisions as to how to proceed with Grid Link.

Some stakeholders advised that, in their experience, substations can attract anti-social behaviour that places neighbours of the substation at risk of theft, etc.

There was quite a lot of concern raised about landowners adjacent to the substations and how the project will affect them.

3.2.5 Feedback from Stakeholders on Existing or Planned Infrastructure

A number of stakeholders indicated that existing and planned infrastructure should be considered a constraint in the process of developing project corridors.

Many submissions discussed the pros and cons of using existing infrastructure corridors for the development of Grid Link and those submissions are detailed in section 4.3.

Many stakeholders commented on wind farms and some stakeholders made specific reference to areas in their knowledge where wind farms had been refused planning permission due to the impact on local visual amenities. A number of stakeholders also suggested that wind farms (or planned wind farms) be considered as project constraints as when wind farms are present in an area there is already an impact. One stakeholder suggested that the project avoid wind farm developments proposed by community groups. Stakeholders also suggested that more be done to support and facilitate micro-generation of power.

Other stakeholders suggested that energy infrastructure constraints for this project should include the gas transmission pipelines. They noted that the project developers for the M9 avoided certain areas due to the presence of a gas pipeline, i.e. it was a constraint and suggested there should be consistency of approach between the M9 and the Grid Link Project.

New or planned local and national roads were also highlighted as constraints. The new N25 road upgrade corridor has only been decided and stakeholders felt this should be factored in as a consideration. Stakeholders also suggested that the planned motorway from Wexford to Rosslare should be taken into account.

Stakeholders also highlighted other infrastructure that is in the development phase and could be in place during the lifetime of the project. This included a possible airport development in Arklow; the

Midleton-Youghal old railway line may potentially be opened up as a public amenity and these stakeholders felt these should be considered as constraints.

Another stakeholder highlighted the fact that at the Teagasc research station at Johnstown Castle some research has been ongoing for 40 years. There was a concern that if the project was developed near the research station that it might adversely impact this important work.

Another concern raised by one stakeholder referred to adding telecommunications equipment to masts and pylons without the need for planning permission. This stakeholder felt that the potential impact of this additional infrastructure should also be taken into account and that if there is a possibility that telecoms will be added, then the separation distance should be increased – particularly in relation to schools, hospitals, crèches, etc.

The potential for the project to impact on the road network and on road users was highlighted both in the context of road safety and road maintenance. Stakeholders highlighted the following concerns:

- Potential impacts on national roads drainage systems and the receiving environment and potential indirect impacts to water quality;
- Infrastructure should not be placed in such a way that it could pose a collision risk to road users;
- Crash mitigation measures should be put in place to reduce the risk in the event of road user collisions;
- Consideration needs to be given to the existing programme of national road development in particular in relation to location of infrastructure, how Grid Link Project might cross the road network; traffic management and environmental issues;
- Consideration should be given to the potential for dust and other material deposition on national roads during the construction and operation of the proposed development, including the implications, if any, for the safety of road users.

3.2.6 Feedback from Stakeholders on Landscape and Visual Impacts

A number of submissions queried how the proposed project will impact on visual receptors (visual amenity) and landscape character including the aesthetic values of the landscape and its vulnerability to change.

Stakeholders felt that areas of outstanding natural beauty should be prioritised and the project should avoid them. Landscapes of historical cultural or archaeological significance should be given priority and avoided. The cultural assessment process should look at visual impact, i.e. on the cultural environment.

The scenic beauty of the landscape of Bunclody, Co. Wexford and the surrounding areas should be considered a constraint. Consideration should be given to what the visual impact would be as it would detract hugely from the heritage and character of the town.

In the Copenagh area, Co. Kilkenny, the development of wind farms has been deemed 'not a likely prospect' by the Local Authority due to the vistas. Similar consideration should be given by the Grid Link Project to the scenic nature of the area.

The Glenasmole Valley is located in an area of outstanding natural beauty. The Council has already placed restrictions on the development of structures within the valley and it was the view of some stakeholders that these restrictions on development should also apply to power lines, particularly in terms of visual impacts.

It was recommended that the protected views at Thomastown, Co. Kilkenny and at the Linguan Valley should be listed as a constraint.

The height and colour of pylons and how they will impact on the landscape is also a key concern. One stakeholder added that less pylon structures would be better overall. In relation to the colour of the towers one submission requested that the colour is not grey/silver.

The visual impact of substations was also a recurring concern. It was suggested that any substation development should be in a wooded area for screening purposes and should not be on high exposed ground directly in the line of sight of communities.

Another stakeholder requested that the approach to Dunstown, Co. Kildare be tidied up by upgrading the 220 kV line to a 400 kV line thereby reducing the overall impact of the infrastructure.

A number of suggestions were put forward as to how landscape and visual impacts should be addressed throughout the project including the following:

- Mapping of areas of outstanding natural beauty and restricting the construction of transmission lines within these areas;
- Use of landscape character assessments and sensitivity mapping when identifying corridor options;
- Mapping of scenic routes and areas of high amenity value.

3.2.7 Feedback from Stakeholders on Strategic Constraints

Some of the constraints raised by stakeholders were strategic in nature and apply across the full study area. Key issues and recommendations made by stakeholders include:

- Stakeholders noted that large areas of the study area are designated as SACs, SPAs and NHAs and advised all designations need to be mapped and they need to be protected;
- Stakeholders also advised that climate change should to be considered – particularly the predicted impacts of climate change such as rising sea level; and
- Flood risks should be mapped and should be considered a major constraint.

3.2.8 Feedback from Stakeholders on Water

It was advised by stakeholders that consideration should be given to how the project crosses inland waterways such as canals and other water bodies such as the Blackwater, Barrow and Nore rivers.

Consideration should be given to the South Western River Basin District (SWRBD) Management Plan particularly:

- Section 4.2.3 of the SWRBD plan which refers to new modifications or sustainable development and this should be taken into account in the development of the Grid Link Project;
- Section 6.1.1 – Land use planning – Any potential impacts from future developments on waters can be mitigated by properly incorporating the objectives established in this (SWRBD) plan into development plans to ensure sustainable development;
- Refer to the EPA website for the latest updated status in order to establish the water body status.

Stakeholders recommended that the impacts from siltation during the construction stage should also be addressed including provision of method statements for ensuring prevention of suspended solids entering watercourses. It was further recommended that methodologies for siltation prevention for the Grid Link Project should refer to the CIRIA guidelines.

It was also recommended that the project should refer to the EPA website for the latest updated water quality status reports/maps in order to establish the water body status.

3.2.9 Feedback from Stakeholders on Terrain

Some stakeholders raised concerns about various features in the study area that would adversely impact the construction of the project and could possibly put the infrastructure at risk.

- For a half mile strip in the Barrow catchment (close to Kilkea Castle) there is sand on either side of the banks of the Barrow between Carlow and Athy and it should be avoided;
- The salt marshes at Bannow Bay, Co. Wexford should be avoided as they will place the infrastructure at risk;
- Croghan Mountain, Co. Wicklow would be unsuitable terrain from a construction perspective.

3.2.10 Feedback from Stakeholders on Tourism

A number of submissions raised concerns over the potential impacts to recreation areas including parks, trails, lakes or other areas where activities occur. One submission raised concerns over landscape and visual impacts to the South Leinster Way and a separate submission raised concerns over potential impacts to walkways within the Blackwater Valley.

Some stakeholders raised concerns about the effect the project will have on tourism and tourism businesses and specifically requested that hotels and mobile home sites, etc., need to be considered.

It was also raised by some that the visual impact of pylons will have an impact on the tourism potential of areas, as scenic views are part of what attracts visitors to the study area.

3.3 FEEDBACK FROM STAKEHOLDERS ON DEVELOPING CORRIDORS

There were many suggestions made regarding how corridors and lines should be routed – with some very specific recommendations made regarding where the corridors should be developed.

One submission outlined the process that should be adopted for addressing the planning constraints for the transmission line. The submission requested that the study team prepare an EIS in line with the provisions of the Irish Planning and Development Regulations (as amended) and Schedules 5, 6 and 7 contained therein and EU Directives in relation to EIA.

In particular the submission noted that the criteria for assessment make no allowance for economic or cost benefit considerations and should focus on the criteria listed below. The primary consideration in the development of corridors should be the characteristics of the proposed development – size, cumulating with other proposed developments, use of resources, etc.

Environmental sensitivities to be considered include:

- Existing land-use
- Natural resources
- Absorption capacity of the area particularly
 - Wetlands
 - Coastal zones
 - Mountains and forest areas
- Natural reserves and parks
- Areas classified and designated
- Areas in which the environmental quality standards laid down in legislation of the EU have already been exceeded.

A lot of suggestions were made regarding the use of the existing pylons on the 220 kV network or using existing infrastructure corridors. It was felt by some, but not all, that this would have less of an impact. However, landowners or people living in the vicinity of existing lines expressed concerns as they believe that having one set of pylons in an area is enough of a burden.

Another submission suggested that electricity transmission corridors should be developed that would use existing railway lines for the installation of transmission lines. This stakeholder felt that this has a number of advantages regarding the project development that this should be explored by the project team.

Stakeholders also recommended the use of the existing infrastructure corridors for gas pipelines and roads (motorways and national roads - M9, N30) and advised that consideration should also be given to how the M9 has divided / impacted people's land.

Other suggestions include:

- Appropriate Assessments should be undertaken in compliance with the applicable legislative requirements throughout the full area of any proposed corridor;
- Corridors and lines should be routed through Coillte owned lands to avoid impacting communities;
- A straight line would be cheaper and the best approach, environmentally. Every effort should be made to avoid using the longer route along the coast as Wexford is a habitat for wildlife;
- The project should not be developed as an overhead line; instead a route should be sought for an underground cable. Other stakeholders suggested that in areas of high population density the project should be underground.

Stakeholders felt that the precautionary principle should be applied to the design criteria. A number of stakeholders felt that there was not enough information available in the scientific community about the health risks of EMF exposure and it was suggested that corridors should be developed with sufficient safe guards in place to maximise the distance between the project and the population in order to keep EMF exposure below certain levels.

One stakeholder suggested that special consideration should be given to how the project is routed around homes and communities and requested that special consideration should be given to schools, crèches, nursing homes and hospitals to ensure that the vulnerable are not over exposed to EMF. It was also suggested that consideration be given to community infrastructure with one stakeholder suggesting that pylons should not be located near local playing pitches.

3.4 FEEDBACK FROM STAKEHOLDERS ON COMMUNICATIONS AND PUBLIC CONSULTATION

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

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

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

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

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

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

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

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

References to consultation activities on other projects were also made. In particular, the M9 public consultation, which some believed made no difference as they felt their comments were not taken on board. One stakeholder referenced the public consultation for the Shanganagh Bray Waste Water Treatment plant as a good example of how to do things. Some stakeholders were concerned that the consultation was a meaningless exercise as, if the decision has already been made on undergrounding, then the consultation has no value.

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

Others stated the importance of providing reassurance to the public advising that EirGrid needs to get the messages about health out to the public.

Elected representatives requested regular briefings with a suggestion that EirGrid make use of the AV room in Dáil Éireann.

3.5 ADDITIONAL FEEDBACK FROM STAKEHOLDERS

3.5.1 Feedback from Stakeholders on Project Need

A number of stakeholders welcomed the project and recognised the Grid Link Project as much needed infrastructure. In particular the value the project has in assisting the integration of renewable energy onto the transmission system, assisting Ireland reach its potential to become a renewable energy exporter and also to meet our agreed targets.

Several attendees at the public open days queried the need for the project.

3.5.2 Feedback from Stakeholders on Cumulative Impacts

Cumulative impacts associated with this project and other proposed developments and permitted projects within the study area including wind farms, existing electricity transmission lines and substations, and the Great Island Power Plant were all identified by stakeholders as being of concern from a cumulative impact perspective.

One stakeholder highlighted that the cumulative impacts of pylons and wind turbines should be assessed – and stated that birds, butterflies and bats travelling along the shore can be deterred by such structures and this should be considered when determining a route.

Some stakeholders felt that alternative locations should be sought for the substations rather than just expanding what is already there. This should involve doing a full search in the area and not necessarily expanding the footprint of the existing stations. Some suggestions were made regarding where the substations might be placed. There was also concern that if the development occurred at the existing nodes then the footprint of the new substation could result in an unacceptable level of additional land take.

The following specific feedback was received in relation to the existing substations:

- One stakeholder suggested that EirGrid should buy out Great Island as an energy hub as there will be so much energy infrastructure in the area;
- Stakeholders commented that Knockraha is a quiet rural residential area and it is not being treated as such by the ESB / EirGrid. They felt their area has become a piece of national infrastructure and has changed the nature of the area in an unacceptable way;
- Some stakeholders commented that to date there has been no accumulated examination of lines in the area of Great Island and that this should be assessed first, before any corridors are developed for the Grid Link Project;
- Stakeholders advised that they are concerned about extra traffic especially in Knockraha where the existing traffic management regime for the substation is not adhered to. The community are adversely affected by this at the moment - adding to the traffic going to the substation will make the situation worse.

3.5.3 Feedback from Stakeholders on Issues with Existing Electricity Infrastructure

Stakeholders gave specific feedback on the maintenance of existing lines as follows:

- Tree cutters involved in line maintenance should be properly trained.
- The insulators used in existing lines have not always been maintained in the experience of some stakeholders.

Stakeholders raised concerns about the noise levels in the vicinity of Knockraha. Particular concerns were raised about the addition of new infrastructure as it was felt it would intensify the already unacceptable noise levels from both the existing substation and overhead lines.

A number of stakeholders advised that they were impacted by corona noise from overhead lines near their property, particularly in damp weather conditions.

While not specifically relevant to the Grid Link project at this point, general comments were made about communications around wayleave agreements.

Some stakeholders raised issues with poor communication in the past with other utilities while others acknowledged that there has been an improvement in this regard in recent years.

Stakeholders also felt that there should be consistency in approach between this project and other EirGrid Projects

4 NEXT STEPS

The Constraints Report will be issued for comment as part of The Grid Link Project Consultation No.2.

The focus of Consultation No. 2 will be to confirm the constraints and seek feedback on how corridors should be developed.