Submission by Monaghan County Council to An Bord Pleanala in accordance with Section 182A of the Planning and Development (Strategic Infrastructure) Act 2006

Regarding the proposed single circuit 400kV overhead transmission line and associated structures (North South 400kV Interconnector)

Located in the townlands of Lemgare, Lisdrumgormly, Annaglogh, Latnakelly, Tassan, Cashel, Annagh (Cremorne Barony (By)), Carrickanure, Clarderry, Cornamucklagh North, Derryhallagh (Monaghan By), (Cremorne By), Brackly (Cremorne By), Tullynahinnera, Cooltrimegish, Boraghy, Aghmakerr, Drumillard (Cremorne By), Tooa, Tullyglass, Cornasassonagh, Corrinenty, Ummerafree, Sreenty, Ardragh, Corvally (Farney By), Raferagh, Cornalaragh, Doagh, Corlea Electoral District (ED) Drumcarrow), Scalkill and Ballaghnagearn. Drumroosk, Cargaghramer, Cornanure (Monaghan By), Rausker, Terrygreeghan, Cornamucklagh South, Crinkill, Clogher, Drumguillew Lower, Drumhawan, Greagh, Co. Monaghan

An Bord Pleanala Ref: 02.VA0017

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Contents

1.0 Preamble

This submission is made under Section 182A(4)(b) and comprises of the technical assessment of the Planning Section of Monaghan County Council and comments by the elected members of Monaghan County Council.

2.0 Technical Assessment

2.1 Principle of Proposal

Section 69 of the Local Government Act 2001 requires a local authority to have regard to "*the policies and objectives of the Government or any Minister of the Government in so far as they may affect or relate to its functions".*

2.1.1 National Spatial Strategy 2002-2020

The National Spatial Strategy (NSS) emphasises that "*a feature of the most mature and successful economies is that they possess highly developed, well integrated infrastructure that supports movement, i.e. public and private transport, and energy and communications networks*." This infrastructure converges at strategic points to drive dynamic and sustainable development.

Section 3.7 of the NSS states *"physical networks of infrastructure such as roads, public transport, energy and communications are of particular relevance to the NSS, since they themselves have a spatial impact and also influence the location, timing and extent of development"*.

The NSS sets out the prime considerations in terms of spatial policies relating to energy as:-

- Developing energy infrastructure on an all-island basis to the practical and mutual benefit of both the Republic and Northern Ireland.
- Strengthening energy network in the West, North West, Border and North Eastern areas in particular.
- Enhancing both the robustness and choice of energy supplies across the regions, through improvements to the national grids for electricity and gas.

2.1.2 Infrastructure and Capital Investment 2012 – 2020 (Medium Term Exchequer Framework)

The *National Development Plan 2007-2013* (NDP) provided support for the Government's Regional Development Strategic Policy Framework including proposals for capital expenditure on strategic infrastructure. In November 2011 the Department of Public Expenditure & Reform published a revised capital programme '*Infrastructure and Capital Investment 2012 – 2016 Medium Term Exchequer Framework*'. This revised Capital Investment Programme superseded the *2007-2013 National Development Plan* and seeks to address the changed fiscal and budgetary situation in the country resulting in reduced capital spending over the medium term.

The Framework identified four main investment strategy components including "*Economic infrastructure – encompassing transport networks, energy provision and telecommunications capacity.* In particular, energy is identified in Section 3.2 as a "*key input to economic activity and the economy must have a secure and reliable source of energy:*

- *To ensure a fully sustainable, secure and competitive energy market underpinned by diverse energy sources, energy efficiency and robust infrastructure, and*
- *To help address climate change by meeting our binding obligations in the reduction of energy related greenhouse gas emissions."*

In terms of investment in energy infrastructure, Section 3.2 of the Framework states that, "*the cost effective maintenance and continued development of the national energy infrastructure networks, and the electricity transmission system in particular, is strategically vital for Foreign Direct Investment and indigenous enterprise, for the economy and domestic consumers, and for regional economic development.*

2.1.3 Delivering a Sustainable Energy Future for Ireland – The Energy Policy Framework 2007-2020

The White Paper sets out the Government's Energy Policy Framework 2007-2020 to deliver a sustainable energy future for Ireland. The document emphasises the fact that "*security of energy supply is crucial for the economy and society*" and that the country "*needs robust electricity networks and electricity generating capacity to ensure consistent supply to consumers and all sectors of the economy*."

The White Paper indicates that the Government's over riding policy objective is "*to ensure that energy is consistently available at competitive prices with minimal risk of supply disruption*". The Paper also states that the underpinning strategic goals are detailed as follows:

- Ensuring that electricity supply consistently meets demand
- Delivering electricity and gas to homes and businesses over efficient, reliable and secure networks
- Being prepared for energy disruptions.

The Government's White Paper emphasises that "*the availability of reliable and secure and competitively priced electricity supply must be assured at all times*" and highlights the fact that electricity "*is a vital ingredient in the competitiveness of Irish industry and Ireland's long term economic and social development*". The Government indicates that to deliver a secure and uninterrupted energy supply at a competitive cost will be underpinned by the following actions:

- Ensuring the delivery of the second North South electricity interconnector by 2011 which will more than double the existing cross border electricity transfer capacity to over 680MW

- Ensuring that the strategic network development approach is underpinned by coordinated local, regional and national approaches to issues, which balance local interests with the national imperative to deliver strategic energy infrastructure.

2.1.4 Green Paper on Energy Policy in Ireland

In May 2014 the Minister for Communications, Energy and Natural Resources launched the consultation process on the *Green Paper on Energy Policy in Ireland* to stimulate a broad and informed debate on energy policy. The Green Paper focuses on Ireland's future energy path is informed by the three key pillars of security, sustainability and competitiveness. It identifies six policy priority areas one of which is 'Planning and Implementing Essential Energy Infrastructure'

The paper considers the structural changes to the energy market since 2007 including the introduction of the all-island Single Electricity Market in 2007 which established a single wholesale electricity market between Ireland and Northern Ireland. In section 3.2 specifically in relation to Electrical Infrastructure the Green Paper acknowledges that '*In the coming years, the Irish grid will need to meet growing demand for electricity, and incorporate higher penetration of renewable energy sources. This combination of requirements presents new network management challenges*.'

The Green Paper also makes reference to the proposed north south interconnector stating '*As part of the Grid25 strategy, EirGrid and ESB Networks continue to work in partnership with Northern Ireland Electricity (NIE) and the System Operator Northern Ireland (SONI) to strengthen cross-border transmission capability by way of the planned second North-South Interconnector, a high capacity transmission line that will run between Counties Meath and Tyrone. Implementation of this project is necessary to reduce transmission flow constraints between North and South, and improve overall system operating efficiency and market liquidity.'*

2.1.5 Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure 2012

In July 2012, the Department of Communications, Energy and Natural Resources published a *Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure*. The Policy Statement notes that '*starting now, over the coming years, Ireland needs to deliver a world class electricity transmission system in all the regions which meets the needs of Ireland into the 21st Century.'* The key strategic policy elements are the affirmation of the need for development and renewal of energy networks to meet both economic and social policy goals. The major investment underway in the high voltage electricity transmission system under the Grid25 programme is stated as being the most important such investment in Ireland's transmission system for several generations.

The concluding paragraph of the Government Policy Statement, which states '*While the Government does not seek to direct infrastructure developers to particular sites or routes or technologies, the Government endorses, supports and promotes the strategic programmes of the energy infrastructure providers, particularly EirGrid's Grid25 investment programme across the regions, and reaffirms that it is Government policy and in the national interest, not least in the current economic circumstances, that these investment programmes are delivered in the most cost efficient and timely way possible, on the basis of the best available knowledge and informed engagement on the impacts and the costs of different engineering solutions.'*

2.1.6 Border Regional Planning Guidelines 2010-2022

The Border Regional Planning Guidelines in Chapter Five identifies a north south interconnector as a key project critical to the future development of the Region and includes the following policy:-

INFP23 *Development plans should facilitate the provision of energy networks in principle, provided that it can be demonstrated that –*

- *the development is required in order to facilitate the provision or retention of significant economic or social infrastructure;*
- *the route proposed has been identified with due consideration for social, cultural and environmental impacts including Habitats Directive Assessment; where required;*
- *the design and type of infrastructure being considered will minimise environmental impacts (including impact upon human beings);*
- *the proposed development is consistent with international best practice with regard to materials and technologies that will ensure a safe, secure, reliable, economic and efficient and high quality network;*
- *in the case of electricity transmission, the undergrounding of lines is considered in the first instance, as part of a detailed consideration and evaluation of all options available in delivering and providing this type of infrastructure*
- *where impacts are inevitable mitigation features have been included*

2.1.7 Monaghan County Development Plan 2007-2013

The County Development Plan recognises that the development of secure and reliable energy infrastructure is a key factor for maintaining and promoting growth together with attracting investment to the County**.** It includes the following objective in Chapter 5**:-**

Objectives for Energy and Renewable Resources	
ERO 10	Facilitate electricity and gas infrastructure improvements/installations which will not result in adverse impacts on the natural or built heritage of the county.

It also includes the following policies in Chapter 15:-

Policies for Electricity and Gas Infrastructure	
EGP 2	Facilitate electricity and gas infrastructure improvements/installations which will not result in adverse impacts on the natural or built heritage of the county.
EGP 3	The undergrounding of electricity transmission lines shall be considered in the first, as part of a detailed consideration and evaluation of all options available in delivering and providing this type of infrastructure, The development shall be consistent with international best practice with regard to materials and technologies that will ensure a safe, secure, reliable, economic, efficient and high quality network, and mitigation measures shall be provided where impacts are inevitable.

2.1.8 Assessment and Conclusion

The objectives and policies of the National Spatial Strategy, the Infrastructure and Capital Investment 2012 – 2020, the Government's Energy Policy Framework 2007-2020 and Statement on the Strategic Importance of Transmission and Other Energy Infrastructure 2012, the Green Paper on Energy Policy in Ireland, the Border Regional Planning Guidelines 2010-2022, and the Monaghan County Development Plan 2013-2019 broadly support the proposed interconnector.

2.2 Consideration of Alternatives

Alternatives in terms of method of transmission, connection and routing were explored in the Environmental Impact Statement.

2.2.1 Transmission Alternatives

The two alternative methods of transmission technology were considered:-

1. High Voltage Alternating Current technology
2. High Voltage Direct Current technology

The planning authority notes that the Environmental Impact Statement concluded on the grounds of efficiency, grid integration, reliability and cost that High Voltage Alternating Current technology was the appropriate alternative.

The two alternative methods of transmission line were also considered:-

1. Alternating Current Overhead Line
2. Direct Current Underground Cable

The planning authority notes that the Environmental Impact Statement concluded on the grounds of reliability, grid integration, environmental impact, cost, fault identification and maintenance/repair reasons that Alternating Current Overhead Line was the appropriate alternative.

Partial undergrounding was also considered. It was considered that partial undergrounding would be feasible where the cumulative maximum length of undergrounding was less than 10 kilometres and that it is a cost effective way of addressing unavoidable environmental or technical constraints. However the Environmental Impact Statement concluded that there were no instances where partial undergrounding was a necessity to overcome the impact of overhead lines or as a preferable alternative.

2.2.3 Connection Alternatives

Initially four cross border connection alternatives were considered:-

Option 1. Development of three additional 110kV connections between Coolkeeragh, Co. Derry and Trillick, Co. Donegal; Louth, Co. Louth and Newry, Co. Down; Tandragee, Co. Armagh and Lisdrum, Co. Monaghan

Option 2. A new 275kV or 400kV connection between Tandragee, Co. Armagh and Louth, Co.Louth following the existing north south interconnector

Option 3. A new 275kV connection between Coolkeeragh, Co. Derry and Srananagh, Co. Sligo

Option 4. A new 275kV or 400kV connection between Drumkee, Co. Tyrone and Arva, Co. Cavan

Following rejection of cross border options 1 and 3 on the grounds of insufficient transfer capacity, further consideration was given to options 2 and 4. In relation to option 2, two alternatives involving extension of the 275kV interconnection between Tandragee, Co. Armagh and Louth, Co. Louth to North Dublin were considered:-

1. Development of new 220kV line
2. Upgrading of existing Corduff - Platin and Corduff - Drybridge 110kV lines

Following further consideration of these two options, it was decided to identify a connection which would provide cross border connection and reinforce the north east grid. Concerns regarding the proximity of Option 2 to built up areas, scenic areas and heritage areas emerged. Option 4 was given preference on the grounds that it would provide a strategic link to the 220kV Louth, Co. Louth to Flagford, Co. Sligo line at a separate geographical location than the existing Louth-Tandragee interconnector.
In relation to option 4, two alternatives for a cross border connection between Tyrone and Cavan were considered:-

a. New circuit between Drumkee, Co. Tyrone and Arva, Co. Cavan
b. New circuit between Drumkee, Co. Tyrone and Kingscourt, Co. Cavan

A connection between Drumkee, Co. Tyrone and Kingscourt, Co. Cavan was given preference on the grounds of it being a shorter route than the Drumkee to Arva route and avoided scenic areas. As a result the Cavan Monaghan Study Area emerged as the location of the interconnector.

2.2.3 Route Alternatives

Following selection by Eirgrid of a new connection between Drumkee, Co. Tyrone and Kingscourt, Co. Cavan and the identification of the Cavan Monaghan Study Area for the location of the interconnector three alternative routes were identified through County Monaghan:-

Corridor A – traverses areas of Magheracloone, Raferagh, Corduff, Shantonagh, Lough Egish, Doohamlet, Cremartin, Annyalla and Clontibret

Corridor B – traverses areas of Magheracloone, Lisdoonan, Laragh, Lough Egish, Castleblayney, Annyalla and Clontibret

Corridor C – traverses areas of Magheracloone, Lisdoonan, Donaghmoyne, Cullaville, Lough Muckno, Annyalla and Clontibret

Corridor A was identified by Eirgrid as the preferred route on the grounds that it avoided designated sites of bio diversity and scenic routes in the county, as it had lower proximity levels to dwellings, and thus had the lowest potential for creating long term significant residual impacts which cannot be mitigated. Eirgrid stated that the preferred route corridor struck the best balance between the often competing priorities of community concerns, environmental issues and the technical aspects of the projects.

2.2.4 Assessment and Conclusion

It is considered that there is limited information in the Environmental Impact Statement to justify the interconnector being taken through County Monaghan. This is based on the fact that the study area gave limited consideration to County Louth as possible route for the interconnector thus militating against an alternative route outside of County Monaghan being identified.

2.3 Impact Upon Landscape Heritage

2.3.1 County Development Plan Policies

In relation to landscape the County Development Plan states "*The unique character of the Monaghan landscape is its intimate quality with drumlins, interspersed with lakes, trees and woodlands. This landscape of small enclosed fields with foreshortened horizons is different and indeed unique from that of the more open landscape found in many other parts of Ireland. It is a landscape that has evolved over the centuries and has traditionally been moulded and protected by agricultural practices*."

There is one principal objective relating to landscape in the Monaghan County Development Plan 2013-2019 relevant to the proposed development:-

Objectives for Landscape Protection	
LPO 1	Sustain, conserve, manage and enhance the landscape diversity, character and quality of the County for the benefits of current and future generations.

There are also three principal policies relating to landscape in the Monaghan County Development Plan 2013-2019 relevant to the proposed development:-

Policies for Landscape Protection	
LPP 1	Ensure the preservation and uniqueness of the county's landscape by having regard to the character, value and sensitivity of landscape as identified in the County Monaghan Landscape Character Assessment, August 2008 (or any subsequent versions) when determining a planning application.
LPP 2	Protect the landscapes and natural environments of the county by ensuring that any new developments in designated sensitive rural landscapes do not detrimentally impact on the character, integrity, distinctiveness or scenic value of the area.
LPP 3	Development which fails to appropriately integrate into the landscape with due regard to visual impact, landscape amenity, the protection of skylines, amenities such as lakes, designated walkways, heritage sites and recreational and tourist facilities shall be resisted.

2.3.2 Landscape Character Assessment

In June 2008 the County Monaghan Landscape Character Assessment was adopted by the Council. This document contains a thorough assessment of the character of Monaghan's landscapes to provide the basis for policy formulation and informed decision-making regarding landscape management in the County.

All landscapes within the county were assessed and characterised. Fourteen Landscape Character Types (LCTs), which are categories of distinct types of landscape were identified in the assessment. The Assessment also identified nine Landscape Character Areas (LCAs), which are geographically specific parcels of landscape that share generic characteristics with other areas of the same type but which have characteristics unique to the area.

The route of the proposed overhead line passes through five LCTs:-
No. 3 – Drumlin Foothills
No. 4 – Farmed Foothills
No. 5 – Farmed Loughlands
No. 12 – Upland Farmland with Rock Outcrops
No. 13 – Upland Plateau

The County Monaghan Landscape Character Assessment only makes specific reference to over head power lines in relation to Upland Farmland with Rock Outcrops by stating "*Transmission masts and other antennae although not currently obvious in this area represent a force for change that could affect this landscape in the future."* Towers 160 to 162 are located within Upland Farmland with Rock Outcrops LCT.

The route of the proposed overhead line also passes through four LCAs:-
No. 5 - Monaghan Drumlin Uplands
No. 6 - Mullyash Uplands
No. 7 - Ballybay Castleblayney Lakelands
No. 8 - Drumlin and Upland Farmland of South Monaghan

In relation to Monaghan Drumlin Uplands the County Monaghan Landscape Character Assessment states "*Most of this landscape is in good condition. The summit or highest point along the ridgeline is likely to be highly sensitive to development because it is visually exposed for many kilometres. In general, this landscape would not be regarded as highly scenic and hence, the capacity to accommodate development without undue compromise to the farmed landscape pattern is good*." It also states "*Summit locations that afford panoramic views are deserving of special treatment in terms of restricting development*." It specifies that "*The summit of the ridgeline must be avoided as the negative visual impact of tall structures viewed on a hilltop against the skyline is substantially greater. Further downslope, these structures may be camouflaged against the backdrop of the landscape pattern and even judiciously placed wooded clumps*." Towers 129 to 136 are located within Monaghan Drumlin Uplands LCA.

In relation to Mullyash Uplands the County Monaghan Landscape Character Assessment states "*The upland flat areas together with the summit of Mullyash Mountain are highly sensitive to development owing to both their scenic quality and visual exposure*." It also states "*The upland flat areas of this landscape would be sensitive to most forms of development owing to the extent of visual exposure. These areas together with the summit of Mullyash should be avoided for any form of large scale development or indeed tall structures*." Towers 103 to 128 are located within Mullyash Uplands LCA

In relation to Ballybay Castleblayney Lakelands the County Monaghan Landscape Character Assessment states "*This is a highly scenic landscape. The farmland is generally in very good condition and the variable drumlin topography and inter drumlin hollows is a key contributing factor to character and high scenic quality. The lough and lough shore landscape settings comprising reeds and riparian vegetation are highly scenic and ecologically valuable. These would be highly sensitive to any form of development."* It asserts *"The lake and lakeshore habitats specifically ought to be protected from almost all forms of development. The visual catchment or geographic areas around each lake from which the lake and associated wetland can be seen would be regarded as highly sensitive to development. Further development on the immediate lakeshore is not recommended. Tall structures will be difficult to site in this 'almost valley' like landscape as these will be visible over a long range*." Towers 137 to 142 are located within Ballybay Castleblayney Lakelands LCA.

In relation to Drumlin and Upland Farmland of South Monaghan the County Monaghan Landscape Character Assessment states "*The lakes and lake environs in particular have a high scenic quality and carry statutory designations and are judged to be highly sensitive to any development changes. In terms of the higher rocky remote landscapes, these would be highly sensitive to any changes involving large*

developments or tall structures. The relative exposure and scarcity of vegetation is such that sizable developments cannot be easily accommodated here without generating negative visual impacts albeit this area is in somewhat poor condition in terms of quality." Towers 144 to 212 are located within Drumlin and Upland Farmland of South Monaghan LCA.

In Chapter 5 "Forces for Change" the Landscape Character Assessment specifically refers to the potential impact of electricity transmission lines. It states that potential for future changes to the County's landscape could be derived from High Voltage Power Lines. It asserts "*The future upgrades of the National Transmission Network have the potential to significantly affect the physical landscape of Co. Monaghan which the County Development Plan seeks to protect. Every effort should be made to ensure that any future developments in this area, do not have a negative impact on our drumlin landscape, the built environment or the quality of life or our people.*"

2.3.3 Assessment

Many of the towers are positioned on top of or near to the crown of drumlins and the line also traverses significant ridges. This has an obvious consequence in relation to the prominence of the proposed development over long range views. It also has the effect of increasing the dominance of the proposed structures in the landscape over short term views.

The assessment of the proposed development is structured using the following criteria:-

Sensitivity of Landscape	
Low	An area of landscape where its character, existing land use, pattern and scale are tolerant of the type of change envisaged and has the capacity to accommodate change.
Moderate	An area of landscape where its character, existing land use, pattern and scale may have the capacity to accommodate the change envisaged.
High	An area of landscape where its character, existing land use, pattern and scale has low capacity to accommodate the change envisaged.

Significance of visual impact	
Minor	Minor changes in views such as at long distances, or visible for a short duration, perhaps at an oblique angle, or which blends to an extent with the existing view
Moderate	Clearly perceptible changes in views such as at intermediate distances, resulting in either a distinct new element in the view, or a more wide ranging, less concentrate change across a wider area.
Major	Major changes in views such as at close distances, affecting a substantial part of the view, continuously visible for a long duration, or obstructing a substantial part or important elements of a view

The table in the following pages illustrates the location of each tower in relation to the Landscape Character Types and Landscape Character Areas within the county, the relevant comments in the Landscape Character Assessment, the sensitivity of the landscape at each location, the significance of the visual impact, and also the detailed consideration in relation to the positioning of the towers.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity Of Local Landscape	Significance of Visual Impact	Consideration
102	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Moderate	33.2m high tower located in N. Ireland on locally low lying ground close to Monaghan Way
103	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Moderate	31 m high tower located in Co. Monaghan on locally low lying ground close to Monaghan Way with line crossing border from tower 102 located in N. Ireland on locally low lying ground.
104	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Moderate	42m high tower located on locally low lying ground close to Monaghan Way with line crossing from tower 103 located on locally low lying ground.
105	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Moderate	34.2m high angle tower located on locally low lying ground close to Monaghan Way with line crossing from tower 104 located on locally low lying ground.
106	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Moderate	37m high tower located on locally low lying ground close to Monaghan Way with line crossing from tower 105 located on locally low lying ground.
107	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Moderate	38m high tower located on locally low lying ground on Lemgare Rocks close to Monaghan Way with line crossing from tower 106 located on locally low lying ground.
108	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	36m high tower located on elevated ground on Lemgare Rocks close to Monaghan Way with line crossing a local road from tower 107 located on locally low lying ground on Lemgare Rocks. The visual impact of this tower and part of the line upon the Monaghan Way and the landscape would be significantly reduced if relocated to lower ground and reduced in height.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
109	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	28.2m high angle tower located on top of a drumlin on elevated ground with line crossing Monaghan Way / public road Monaghan Way from tower 108 located on elevated ground on Lemgare Rocks. The visual impact of this tower and part of the line upon the Monaghan Way and the landscape would be significantly reduced if relocated to lower ground.
110	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Moderate	36m high tower located on falling ground in an elevated area with line crossing from tower 109 located on top of a drumlin.
111	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	32 high tower located in elevated area with line crossing from tower 110 located on falling ground in an elevated area. The visual impact of this tower and the line upon the landscape would be significantly reduced if relocated to lower ground.
112	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	26.2m high angle tower located on a line of mature trees on top of a drumlin in an elevated area with line crossing from tower 111 located in elevated area. The visual impact of this tower and part of the line upon the landscape would be significantly reduced and the loss of mature trees would be avoided if tower is relocated to lower ground.
113	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Moderate	43m high tower located on locally low lying ground with line crossing from tower 112 located on top of a drumlin.
114	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	39m high tower located on upper slope of a drumlin in an elevated area with line crossing a ridge from tower 115 located on upper slope of the ridge. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to lower ground.
115	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	39m high tower located in an elevated area close to Lough Nahinch, Lough Tassan and Cashel Bog with line crossing from tower 114 located on upper slope of a drumlin in an elevated area.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
116	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	29.2m high angle tower located in an elevated area close to Lough Nahinch, Lough Tassan and Cashel Bog with line crossing a public road from tower 115 located in an elevated area.
117	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	28m high tower located on edge of Cashel Bog close to Lough Nahinch and Lough Tassan with line crossing from tower 116 located in an elevated area.
118	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	36.2m high angle tower located on edge of Cashel Bog close to Lough Nahinch and Lough Tassan with line crossing part of Cashel Bog from tower 116 located in an elevated area.
119	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	46m high tower located in on edge of Cashel Bog close to Lough Nahinch and Lough Tassan with line crossing from tower 118 located on edge of Cashel Bog. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to lower ground andreduced in height.
120	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	51m high tower located on edge of Cashel Bog with line crossing from tower 119 located on edge of Cashel Bog. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to lower ground and reduced in height.
121	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	36.2m high angle tower located the upper slope of a drumlin ridge close to former N2 with line crossing a drumlin from tower 120 located on edge of Cashel Bog. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to lower ground.
122	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	Moderate	Major	39m high tower located on locally low lying ground close to N2 with line crossing former N2 from tower 121 located on the upper slope of a drumlin ridge close to N2. The visual impact of this tower and part of the line would be significantly reduced if relocated away from the N2 and reduced in height.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
123	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	Moderate	Major	41m high tower located on mid slope of a drumlin ridge with line crossing N2 from tower 122 located on locally low lying ground close to N2. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slopes of the ridge and reduced in height.
124	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	Moderate	Major	42m high tower located on mid slope of a drumlin ridge with line crossing a ridge from tower 123 located on mid slope of a drumlin ridge. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to lower slopes of the ridge and reduced in height.
125	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	Moderate	Major	32m high tower located on upper slope of a drumlin with line crossing a local road from tower 124 located on mid slope of a drumlin ridge The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to lower slopes of the drumlin.
126	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	Moderate	Moderate	36.2m high angle tower located on locally low lying ground with line crossing from tower 125 located on upper slope of a drumlin.
127	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	31m high tower located on upper slope of a drumlin with line crossing a local road from tower 126 located on locally low lying ground. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to lower slopes of the drumlin.
128	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Moderate	38m high tower located on locally low lying ground close to Clarderry Bog with line crossing from tower 127 located on upper slope of a drumlin.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
129	Drumlin Foothills	Monaghan Drumlin Uplands	Summit or highest point along the ridgeline visually exposed and likely to be highly sensitive to development, particularly tall structures	High	Moderate	40m high tower located on small drumlin close to Ghost Lough, Drumgristin Lough and Coogan's Lough with line crossing from tower 128 located on locally low lying ground. The visual impact of this tower and part of the line upon the setting of the loughs would be significantly reduced if relocated away from Ghost Lough, Drumgristin Lough and Coogan's Lough and reduced in height.
130	Drumlin Foothills	Monaghan Drumlin Uplands	Summit or highest point along the ridgeline visually exposed and likely to be highly sensitive to development, particularly tall structures	High	Moderate	36.2m high angle tower located on locally low lying ground close to Ghost Lough, Drumgristin Lough and Coogan's Lough with line crossing from tower 129 located on small drumlin. The visual impact of this tower and part of the line upon the setting of the loughs would be significantly reduced if relocated away from Ghost Lough, Drumgristin Lough and Coogan's Lough and reduced in height.
131	Drumlin Foothills	Monaghan Drumlin Uplands	Summit or highest point along the ridgeline visually exposed and likely to be highly sensitive to development, particularly tall structures	High	Major	43m high tower located on a locally elevated area close to Ghost Lough, Drumgristin Lough and Coogan's Lough with line crossing existing 110kV Lisdrum-Louth line from tower 130 located on locally low lying ground. The visual impact of this tower and part of the line upon the setting of the loughs would be significantly reduced if relocated away from Ghost Lough, Drumgristin Lough and Coogan's Lough and reduced in height.
132	Drumlin Foothills	Monaghan Drumlin Uplands	Summit or highest point along the ridgeline visually exposed and likely to be highly sensitive to development, particularly tall structures	Moderate	Moderate	36.2m high angle tower located on lower slope of a drumlin with line crossing a public road from tower 131 located on a locally elevated area.
133	Drumlin Foothills	Monaghan Drumlin Uplands	Summit or highest point along the ridgeline visually exposed and likely to be highly sensitive to development, particularly tall structures	Moderate	Major	42m high tower located on upper slope of a drumlin with line crossing from tower 132 located on lower slope of a drumlin. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slopes of the drumlin and reduced in height.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
134	Drumlin Foothills	Monaghan Drumlin Uplands	Summit or highest point along the ridgeline visually exposed and likely to be highly sensitive to development, particularly tall structures	Moderate	Moderate	34m high tower located on mid slope of a drumlin with line crossing from tower 133 located on upper slope of a drumlin. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slopes of the drumlin.
135	Drumlin Foothills	Monaghan Drumlin Uplands	Summit or highest point along the ridgeline visually exposed and likely to be highly sensitive to development, particularly tall structures	Moderate	Moderate	41m high tower located on lower slope of a drumlin with line crossing from tower 134 located on mid slope of a drumlin.
136	Drumlin Foothills	Monaghan Drumlin Uplands	Summit or highest point along the ridgeline visually exposed and likely to be highly sensitive to development, particularly tall structures	Moderate	Moderate	35.2m high angle tower located on relatively low lying ground with line crossing from tower 135 located on lower slope of a drumlin.
137	Farmed Loughlands	Ballybay Castleblayney Lakelands	Variable drumlin topography and inter drumlin hollows of high scenic quality. Tall structures would be visible over long ranges. Lough and lough shore landscape settings highly sensitive to development. Further development on lakeshore is not recommended.	Moderate	Major	33m high tower located on top of a drumlin with line crossing a public road from tower 136 located on relatively low lying ground. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slopes of the drumlin.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
138	Farmed Loughlands	Ballybay Castleblayney Lakelands	Variable drumlin topography and inter drumlin hollows of high scenic quality. Tall structures would be visible over long ranges.Lough and lough shore landscape settings highly sensitive to development. Further development on lakeshore is not recommended.	Moderate	Moderate	41m high tower located on locally low lying ground with line crossing from tower 137 located on top of a drumlin.
139	Farmed Loughlands	Ballybay Castleblayney Lakelands	Variable drumlin topography and inter drumlin hollows of high scenic quality. Tall structures would be visible over long ranges. Lough and lough shore landscape settings highly sensitive to development. Further development on lakeshore is not recommended.	Moderate	Major	27m high tower located on top of a drumlin with line crossing from tower 138 located on locally low lying ground. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slopes of the drumlin.
140	Farmed Foothills	Ballybay Castleblayney Lakelands	Variable drumlin topography and inter drumlin hollows of high scenic quality. Tall structures would be visible over long ranges. Lough and lough shore landscape settings highly sensitive to development. Further development on lakeshore is not recommended.	Moderate	Moderate	36.2m high angle tower located on mid slope of a drumlin with line crossing a former rail line from tower 139 located on top of a drumlin. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slopes of the drumlin.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
141	Farmed Foothills	Ballybay Castleblayney Lakelands	Variable drumlin topography and inter drumlin hollows of high scenic quality. Tall structures would be visible over long ranges. Lough and lough shore landscape settings highly sensitive to development. Further development on lakeshore is not recommended.	Moderate	Major	36m high tower located on upper slope of a drumlin with line crossing from tower 140 located mid slope of a drumlin. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slopes of the drumlin.
142	Farmed Foothills	Ballybay Castleblayney Lakelands	Variable drumlin topography and inter drumlin hollows of high scenic quality. Tall structures would be visible over long ranges. Lough and lough shore landscape settings highly sensitive to development. Further development on lakeshore is not recommended.	Moderate	Major	36.2m high angle tower located on relatively low lying ground close to regional road with line crossing from tower 141 located on upper slope of a drumlin.
143	Farmed Foothills	Ballybay Castleblayney Lakelands	Variable drumlin topography and inter drumlin hollows of high scenic quality. Tall structures would be visible over long ranges. Lough and lough shore landscape settings highly sensitive to development. Further development on lakeshore is not recommended.	Moderate	Major	36m high tower located on relatively low lying ground with line crossing a regional road from tower 142 located on relatively low lying ground close to regional road.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
144	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	40m high tower located on upper slope of a drumlin with line crossing a public road from tower 143 located on relatively low lying ground. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to lower slopes of the drumlin and reduced in height.
145	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	42m high tower located on mid slope of a drumlin with line crossing over drumlin from tower 144 located on upper slope of a drumlin.
146	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	41m high tower located on the mid slope of a drumlin close to Crinkill or Toome Lough with line crossing from tower 144 located on midslope of a drumlin. This tower should be directed away from Crinkill or Toome Lough to lessen visual impact of it and the line upon the setting of the lough.
147	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	38m high tower located on relatively low lying ground close to Crinkill or Toome Lough with line crossing from tower 146 located on mid slope of a drumlin. This tower should be directed away from Crinkill or Toome Lough to lessen visual impact of it and the line upon the setting of the lough.
148	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	38m high tower located on relatively low lying ground close to Crinkill or Toome Lough with line crossing from tower 147 located on upper slope of a drumlin. This tower should be directed away from Crinkill or Toome Lough to lessen visual impact of it and the line upon the setting of the lough.
149	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	34.2m high angle tower located on upper slope of a drumlin with line crossing from tower 82 located on relatively low lying ground. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slopes of the drumlin.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
150	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	43m high tower located lower slope of a drumlin close to a public road with line crossing from tower 149 located on upper slope of a drumlin. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slopes of the drumlin.
151	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Moderate	41m high tower located on mid slope of a drumlin with line crossing a public road from tower 150 located on lower slope of a drumlin.
152	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Moderate	43m high tower located in recess in rising ground with line crossing from tower 151 located on mid slope of a drumlin.
153	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	43m high tower located on elevated ground with line crossing from tower 152 located in recess in rising ground. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slopes of the ridge and reduced in height.
154	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	33.2m high angle tower located on elevated ground with line crossing from tower 153 located on elevated ground. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slopes of the ridge.
155	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	40m high tower located on upper slope of ridge in an elevated area with line crossing from tower 154 located on falling ground. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slopes of the ridge and reduced in height.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
156	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Moderate	31m high tower located on elevated open ground with line crossing a ridge from tower 155 located on upper slope of ridge. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated away from open and elevated landscape.
157	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	36.2m high angle tower located on elevated open ground with line crossing a ridge from tower 156 located on upper slope of ridge. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated away from open and elevated landscape.
158	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	33m high angle tower located on elevated open ground with line crossing local road from tower 157 located on flat open ground. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated away from open and elevated landscape.
159	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	38m high tower located on elevated open ground with line crossing from tower 158 located on flat open ground. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated away from open and elevated landscape and reduced in height..
160	Upland Farmland with Rock Outcrops	Drumlin and Upland Farmland of South Monaghan	Transmission masts could affect this landscape. Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Moderate	33m high tower located on locally low lying ground with line crossing from tower 159 located on flat open ground.
161	Upland Farmland with Rock Outcrops	Drumlin and Upland Farmland of South Monaghan	Transmission masts could affect this landscape. Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Moderate	36.2m high angle tower located on locally low lying ground with line crossing from tower 160 located on locally low lying ground.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
162	Upland Farmland with Rock Outcrops	Drumlin and Upland Farmland of South Monaghan	Transmission masts could affect this landscape. Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Moderate	43m high tower located on locally low lying ground with line crossing from tower 161 located on locally low lying ground.
163	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	42m high tower located on locally low lying ground close to a regional road with line crossing from tower 162 located on locally low lying ground.
164	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Moderate	29m high tower located on mid slope of drumlin ridge in an elevated area with line crossing a regional road from tower 163 located on locally low lying ground.
165	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Moderate	43m high tower located on mid slope of a drumlin ridge with line crossing a drumlin from tower 164 located on mid slope of an elevated drumlin ridge.
166	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	28.2m high angle tower located on top of a drumlin close to Lough Morne with line crossing a public road from tower 165 located on mid slope of a drumlin ridge. The visual impact of this tower and part of the line upon the landscape and Lough Morne would be significantly reduced if directed away from lough and relocated to the lower slopes of the ridge.
167	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	34m high tower located on top of a drumlin in an elevated area close to Lough Morne and crossing from tower 166 located on top of a drumlin. The visual impact of this tower and part of the line upon the landscape and Lough Morne would be significantly reduced if directed away from lough and relocated to the lower slopes of the ridge.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
168	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Moderate	42m high tower located on lower slope of a drumlin with line crossing from tower 167 located on top of a drumlin.
169	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	29.2m high tower located on lower slope of a drumlin with line crossing from tower 168 located on lower slope of a drumlin.
170	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Moderate	37m high tower located on lower slope of a drumlin with line crossing regional road from tower 169 located on lower slope of drumlin.
171	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	29m high tower located on upper slope of a drumlin close to a scenic route and a Historic Designed Garden and with line crossing from tower 170 located on lower slope of drumlin. The visual impact of this tower and part of the line upon the landscape and scenic route would be significantly reduced if directed away from the scenic route and Historic Designed Garden and relocated to the lower slopes of the drumlin.
172	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	43m high tower located on lower slope of a drumlin with line close to a scenic route and Historic Designed Garden from tower 171 located on upper slope of drumlin. The visual impact of this tower and part of the line upon the landscape and scenic route would be significantly reduced if directed away from the scenic route and Historic Designed Garden and relocated to the lower slopes of the drumlin.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
173	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	31m high tower located on upper slope of a drumlin with line close to a scenic route and Historic Designed Garden from tower 172 located on lower slope of drumlin. The visual impact of this tower and part of the line upon the landscape and scenic route would be significantly reduced if directed away from the scenic route and Historic Designed Garden and relocated to the lower slopes of the drumlin.
174	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	41m high tower located on upper slope of a drumlin with line close to a scenic route and Historic Designed Garden from tower 173 located on upper slope of drumlin. The visual impact of this tower and part of the line upon the landscape and scenic route would be significantly reduced if directed away from the scenic route and Historic Designed Garden and relocated to the lower slopes of the drumlin.
175	Farmed Loughlands	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	34m high tower located on upper slope of a drumlin close to Bocks Lough with line crossing public road from tower 174 located on upper slope of a drumlin The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slopes of the drumlin.
176	Farmed Loughlands	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	35.2m high angle tower located on mid slope of a drumlin with line passing by Bocks Lough from tower 175 located on upper slope of a drumlin. The visual impact of this tower and part of the line upon the landscape and Bocks Lough would be significantly reduced if directed away from the lough and relocated to the lower slopes of the drumlin.
177	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Moderate	32m high tower located mid slope of a drumlin with line crossing public road from tower 176 located on mid slope of a drumlin.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
178	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Moderate	38m high tower located on locally low lying ground with line crossing from tower 177 located mid slope of a drumlin.
179	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	35m high tower located on upper slope of a drumlin with line crossing public road from tower 178 located on falling ground. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slopes of the drumlin.
180	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Moderate	42m high angle tower located on lower slope of a drumlin with line crossing from tower 179 located on upper slope of a drumlin.
181	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Moderate	31.2m high angle tower located on relatively flat open ground with line crossing existing 110kV Louth-Shankill line from tower 180 located on upper slope of a drumlin.
182	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	39m high tower located on upper slope of a ridge with line crossing public road from tower 181 located on relatively flat open ground. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slopes of the ridge and reduced in height.
183	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	36m high tower located on elevated plateau with line crossing ridge from tower 182 located on upper slope of a ridge. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated away from the plateau.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
184	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Moderate	36.2m high angle tower located in locally low lying area with line crossing a public road from tower 183 located on elevated plateau.
185	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Moderate	43m high tower located on mid slope of a drumlin with line crossing ridge from tower 184 located in locally low lying area.
186	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	36.2m high angle tower located on upper slope of an elevated ridge with line crossing valley and a public road from tower 185 located on mid slope of a drumlin. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slopes of the ridge.
187	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	43m high tower located on lower slope of a drumlin close to a public road with line crossing ridge from tower 186 located on upper slope of ridge. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated further away from public road.
188	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	28.2m high angle tower located on upper slope of a large elevated ridge with line crossing ridge and a public road from tower 187 located on lower slope of a drumlin. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slopes of the ridge.
189	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	38m high tower located on upper slope of a large elevated ridge with line crossing smaller ridge from tower 188 located on upper slope of large ridge. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slopes of the ridge and reduced in height.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
190	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	37m high tower located on upper slope of a large elevated ridge with line crossing ridge from tower 189 located on upper slope of large ridge. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slopes of the ridge.
191	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	32m high tower located mid slope of large ridge with line crossing from tower 190 located on upper slope of large ridge. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slopes of the ridge and reduced in height.
192	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Moderate	39m high tower located on lower slope of large ridge with line crossing local road from tower 191 located mid slope of large ridge.
193	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	32m high tower located on upper slope of drumlin with line crossing a public road from tower 192 located on lower slope of large ridge. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slopes of the drumlin.
194	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	42m high tower located on upper slope of drumlin with line crossing regional road and passing Corvally Lough from tower 193 located on upper slope of drumlin. The visual impact of this tower and part of the line upon the landscape and Corvally Lough would be significantly reduced if directed away from the lough and relocated to the lower slopes of the drumlin and reduced in height.
195	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Moderate	42m high tower located on rising ground with line crossing drumlin from tower 194 located on upper slope of drumlin.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
196	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Moderate	36m high tower located on rising ground with line crossing from tower 195 located on rising ground.
197	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	29.2m high angle tower located on upper slope of an elevated drumlin with line crossing a public road from tower 196 located on rising ground. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slope of the drumlin.
198	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	43m high tower located on upper slope of a drumlin close to wetlands with line crossing from tower 197 located on upper slope of a drumlin. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slope of the drumlin and reduced in height.
199	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	40m high tower located on upper slope of a drumlin with line crossing ridge from tower 198 located on upper slope of a drumlin. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slope of the drumlin.
200	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	43m high tower located mid slope of a drumlin with line crossing two public roads from tower 199 located on upper slope of a drumlin. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slopes of the drumlin and reduced in height.
201	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	40m high tower located on upper slope of an elevated drumlin with line crossing drumlin from tower 200 located mid slope of drumlin. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slopes of the drumlin and reduced in height.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
202	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Moderate	34m high tower located on lower slope of a drumlin on a hedgerow with line crossing from tower 201 located on upper slope of drumlin.
203	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	26.2m high angle tower located on upper slope of a drumlin with line crossing from tower 202 located on lower slope of drumlin. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slopes of the drumlin.
204	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Moderate	30m high angle tower located on lower slope of a drumlin with line crossing from tower 203 located on lower slope of drumlin.
205	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Moderate	40m high tower located on undulating ground with line crossing local road from tower 204 located on lower slope of a drumlin.
206	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Moderate	43m high tower located on mid slope of a drumlin close to Corlea Bog with line crossing from tower 205 located undulating ground. The visual impact of this tower and part of the line upon the landscape and Corlea Bog would be significantly reduced if directed away from the bog.
207	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Moderate	33.2m high tower located on locally low lying ground with line crossing a public road and Corlea Bog from tower 206 located on mid slope of a drumlin. The visual impact of this tower and part of the line upon the landscape and Corlea Bog would be significantly reduced if directed away from the bog.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
208	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	27m high tower located on top of a drumlin with line crossing from tower 207 located on locally low lying ground. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slope of the drumlin.
209	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Moderate	39m high angle tower located on mid slope of a drumlin with line crossing from tower 208 located on top of a drumlin.
210	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	38m high tower located on top of a drumlin with line crossing a local road from tower 209 located on mid slope of a drumlin. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slopes of the drumlin and reduced in height.
211	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	43m high tower located on upper slope of a drumlin with line crossing a local road from tower 210 located on upper slope of a drumlin. The visual impact of this tower and part of the line upon the landscape would be significantly reduced if relocated to the lower slopes of the drumlin and reduced in height.
212	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	34.2m high tower located in Co. Cavan on mid slope of a drumlin with line crossing a regional road from tower 211 located on upper slope of a drumlin in Co. Monaghan

2.3.4 Conclusion

It is considered that insufficient consideration has been given to the visual impact of the development upon the landscape having regard to the relevant objectives and policies of the Monaghan County Development Plan and the County Monaghan Landscape Character Assessment. The route of the proposed line in places and the individual siting of some of the towers raises concern in respect of adverse impact upon the landscape in general as well as individual elements of the landscape, and alternative routing of the line and siting of towers does not appear to have been considered/discounted to mitigate against these concerns.

Of particular concern are 60 towers (107-109, 112, 114, 116-125, 127-131, 133, 134, 137, 139, 141, 144, 146,-150, 153-159, 164, 166, 167, 171-176, 179, 182, 183, 186-191, 193,194, 197-201, 203, 206-208, 210, 211). These towers are either located in elevated or exposed positions or are close to scenic landscapes or landscape features such as lakes and wetlands. The Environmental Impact Statement has failed to justify the positioning of the towers in particular locations in the local landscape that are considered visually obtrusive and has not given due regard to objective LPO1 and policies LPP2 and LPP3 of the Monaghan County Development Plan 2013-2019. Although it is necessary to balance visual impact of the proposed development with other issues such as proximity of the proposed development to existing and permitted dwellings, impact upon archaeological and architectural structures and impact upon sites of bio diversity, greater detail is required to justify the location of each tower on or near the upper reaches of drumlin and elevated ridges and the reason why these towers could not be relocated down slope or rerouted around drumlins or ridges to reduce their prominence in the landscape or upon particular elements of the landscape. The route of the proposed line and siting of the towers should be revised to lessen their visual impact.

There are also some concerns with the photomontages within the Environmental Impact Statement. Some of the identified critical views are not considered to represent points at that location where the proposed development will be clearly visible from or visible over a wide area. For example critical view 35 is taken from a low point where visibility of the landscape and the proposed development is restricted and critical view 19 is taken from the lower part of a scenic route where visibility of the landscape and the proposed development is restricted. In other instances critical view 9 is taken from a layby at a point where an earth embankment obscures the view of the development which would be possible of it when past the embankment, and critical view 10 is taken at a point along the road where an intervening roadside bush obscures the view of the proposed development which is not the case further along the road.

Other photomontages do not adequate portray the legibility of the towers in the landscape. For example the towers are not very legible in critical views 6, 19, 23 and 25 and it would be expected that the towers would be more noticeable than portrayed particularly on a clear or sunny day. In addition tower 147 is not very legible in critical view 18, tower 170 is not very legible in critical view 25 and towers 182 and 183 are not very legible in critical view 27. It is expected that these towers would be more legible in the landscape.

In additional there appears to be inaccuracies in the imposition of the towers in the photomontages. Tower 170 in view 26 appears to be in the wrong location.

2.4 Impact Upon Areas of Amenity

2.4.1 Assessment

A number of Areas of Amenity (both Primary and Secondary) have been identified in the Monaghan County Development Plan 2007-2013. In relation to Areas of Amenity the County Development Plan states "*These areas are important not only for their intrinsic value as places of natural beauty but because they provide a real asset for residents and visitors alike in terms of recreation, contemplation and tourism.*"

In respect of the designated Areas of Primary Amenity Value, the setting of Lough Muckno and Environs Area of Primary Amenity Value has potential to be affected by the proposed development. Although there is also the potential for views from Sliabh Beagh and Bragan Mountain Area of Primary Amenity Value to be affected, this would be very limited and would relate to the views south from this area.

In respect of the designated Areas of Secondary Amenity Value, the setting of Mullyash Mountain Area of Secondary Amenity Value has the greatest potential to be affected by the proposed development as well as Lough Major and Environs Area of Secondary Amenity Value, and to a lesser extent Castleshane Woods and Environs Area of Secondary Amenity Value.

2.4.2 Conclusion

It is considered that the Environmental Impact Statement has adequately assessed the potential for impact upon Areas of Primary and Secondary Amenity designated within the Monaghan County Development Plan 2013-2019.

2.5 Impact Upon Views and Prospects

2.5.1 County Development Plan Policies

There is one principal policy relating to views and prospects in the Monaghan County Development Plan 2013-2019 relevant to the proposed development:-

Policies for Areas of Visual Amenity	
AVP 1	Protect the views from scenic routes listed in Appendix 2, Scenic Routes. Development will be strictly controlled along these routes and no development will be permitted that will detrimentally impact on the visual character or amenity of these views. Particular emphasis will be placed on the preservation of views of lakes, rivers, unspoilt landscape or views of historical, heritage and/or cultural interest.

2.5.2 Assessment

The proposed development passes within range of the following scenic routes designated within the Monaghan County Development Plan 2013-2019:-

SV 12 – SV 14: Scenic drive and views of open countryside from Mullyash (Routes LS07631, LS03603, LS07650).
The proposed development although 6 kilometres away from the closest portion of these scenic routes will be visible from routes SV12 and SV14. Views of the northern and central portion of the development are possible from scenic route SV12. The central section of the development will be visible from scenic routes SV12 and SV14. The southern portion of the proposed development may also be visible from these scenic routes. There are concerns that the impact of the proposed development upon the views from these scenic routes has not been adequately portrayed in the environmental impact statement. Critical view 6 of the photomontage is taken from scenic route SV12, however it would be expected that the towers would be more noticeable than portrayed, particularly on a clear or sunny day.

SV 21: Scenic Views of Lough Egish (Route LP04121)
The central portion of the proposed development will be highly visible from this scenic route being approximately one kilometre away. There are concerns that the impact of the proposed development upon the view from this scenic route has not been adequately portrayed in the environmental impact statement. Critical view 19 of the photomontage is taken from the lower part of this scenic route where visibility of the landscape and the proposed development is restricted.

SV 22: Scenic drive at Beagh, Shantonagh and Corlat (Route LT 40431)
The sections of the southern portion of the proposed development will be highly visible from this scenic route being less than one kilometre away. There are concerns that the impact of the proposed development upon the view from this scenic route has not been adequately portrayed in the environmental impact statement. Critical views 26 and 27 of the photomontage are taken from this scenic route, but towers 178, 179 and 180 are not as legible as they should be in critical view 26 and towers 182 and 183 are not as legible as they should be in critical view 27.

SV 23: Views of Lough Bawn and County Cavan (Route LT 71111)
The southern portion of the proposed development will be visible from this scenic route given the lack of intervening landform. There are concerns that the impact of the proposed development upon the view from this scenic route has not been adequately portrayed in the environmental impact statement. Critical

view 24 of the photomontage is taken from this scenic route, but those towers that will be visible are not as legible as they should be.

2.5.3 Conclusion

It is considered that the environmental impact statement has adequately considered the visual impact of the proposed development upon the views from the scenic routes designated in the Monaghan County Development Plan 2013-2019. However, the proposed development will have significant visual impact upon the views from scenic routes SV22 and SV23 and moderate visual impact upon the views from scenic routes SV12-14 and SV21. The environmental impact statement does not indicate that any necessary mitigation measures such as relocation or reduction in height of towers have been included to lessen the visual impact of the proposed development upon these scenic routes.

2.6 Impact Upon Lakes and Their Environs

2.6.1 County Development Plan Policies

In the Monaghan County Development Plan 2013-2019 the following policy relates to lakes and their environs:-

Policies for Areas of Visual Amenity	
AVP 2	Protect the scenic quality of lakes by prohibiting development which is located between a public road and a lake, where the development would interrupt a view of the lake, or detrimentally impact on the setting of that lake. Development may be permitted between a road and a lakeshore where the development is screened from the lake by existing topography or vegetation. An exception to this policy may include short term let holiday accommodation or recreational development where a specific need has been established. The design, scale and setting of development granted under this exception should reflect the site's sensitive location. Such prohibition will also apply to high open landscape over looking lakes and waterways, where such development would detrimentally impact on the setting of that lake or waterway *For the purpose of this policy a lake is considered to be a permanent (i.e.non seasonal) water feature in excess of 1 hectare.*

2.6.2 Assessment

A number of non seasonal lakes lie within the immediate vicinity of the proposed development:-
Lough Nahinch
Tassan Lough
Ghost Lough
Drumgristin Lough
Coogan's Lough
Toome or Crinkill Lough
Lough Egish
Boraghy Lake
Lough Mourne
Bocks Lough
Shantonagh Lough
Comertagh Lough

The proposed development will directly and adversely affect the settings of these lakes and their environs in varying degrees. In addition, in a number of instances the proposed development will be located between the road and the lake specifically contravening policy AVP2 of the Monaghan County Development Plan 2013-2019.

2.6.3 Conclusion

The Environmental Impact Statement has failed to properly assess the visual impact of the proposed development upon the settings of the above lakes and their environs and consequent mitigation measures have not been included. Therefore the Environmental Impact Statement has failed to give due consideration to policy AVP2 of the Monaghan County Development Plan 2013-2019.

2.7 Impact Upon Trees and Hedgerows

In relation to trees and hedgerows the Monaghan County Development Plan 2013-2019 states "*Trees and hedgerows contribute significantly to biodiversity and landscape character in County Monaghan. Hedgerows have significant ecological importance as wildlife habitats and historical importance as town land and field boundaries as well as providing visual screening*. *Hedgerows are a valuable multi-functional resource in our countryside, benefiting agriculture, wildlife, the environment, tourism and the general community."*

2.7.1 County Development Plan Policies

There are three principal policies relating to trees and hedgerows in the Monaghan County Development Plan 2013-2019 relevant to the proposed development:-

Policies for Protection of Trees and Hedgerows	
THP 1	Protect trees and hedgerows from development that would impact adversely upon them. Development proposals which necessitate the removal of extensive amounts of trees and hedgerows should be avoided and transplanting of existing trees and hedgerows should be employed where appropriate.
THP 2	Preserve trees and/or groups of trees that form significant features in the landscape or have particular importance in setting the landscape character of an area or which contribute to the biodiversity of the area (Appendix 3, Trees of Special Amenity Value).
THP 3	Ensure that existing mature trees, woodlands and hedgerows are, as far as practicable, preserved and incorporated into any new developments or where removal is unavoidable, compensatory planting of at least equal amounts of native trees and shrubs should be undertaken.

2.7.2 Assessment

The proposed development is sufficiently removed from any Trees of Special Amenity Value designated within the Monaghan County Development Plan 2013-2019 so as not to have any impact upon their setting or integrity.

The proposed development has the potential to directly affect undesignated trees and hedgerows along its route as it crosses a substantial number of field boundaries and stands/groups of trees that may need to be topped, removed or cleared to facilitate the development. Hedgerows and tree lines are noted for their importance as ecological corridors (Article 10, Habitats Directive) and as habitats in their own right. They have been categorised as to their structure and diversity, and classified into relative importance in the Volume 3C of the Environmental Impact Statement. It is noted that efforts have been made to minimise the impacts of the development on these habitats by avoiding locating towers in hedgerows and through mitigation measures. Although the majority of towers are located a sufficient distance away from trees and hedgerows to ensure their preservation and Section 6.5 of Volume 3C of the Environmental Impact Statement has stated that only vegetation above six metres in height will be affected by topping/clearing, it is noted that mature trees and hedgerows will be removed at towers 112, 140, 143 and 202 due to the positioning of these towers directly on these hedgerows/tree lines. It is also noted that a clearance corridor width of up to 74 metres (ie. 37 metres either side of the centre of the over head line) is mentioned. There is no justification provided in the Environmental Impact Statement for such a wide clearance area,

particularly when the falling distance of most trees would be in the range of 8-14 metres. Further details of clearance areas is required.

Although hedgerows will be lopped during the operational lifetime of the over head line to maintain distances from wires, it is noted that this will only occur where hedgerows and treelines are above 6 metres and presumably only where the sag of the over head line is close to the top of the hedgerow. It is noted that approximately 92 hedgerows and 56 tree lines will be affected at most and that in most cases the base of the hedgerow will still remain. It is recommended that an ecological clerk of works should supervise these works on an on going basis.

There is limited specific information on field boundary hedgerow removal to facilitate the widening of existing laneways or the creation of new 4 metre wide access tracks to the towers and stringing locations in the construction period, although it is noted that replacement of removed hedgerows will be carried out. Examples of towers where access will necessitate hedgerow removal are towers 103, 104, 106, 109, 111, 114, 115, 118-120, 123, 137-139, 145, 148, 149, 151, 154, 155, 159, 164, 166, 172, 185, 188, 191, 196, 197, 200-203, 205, 207, 210, and 211.

2.7.3 Conclusion

It is considered that the Environmental Impact Statement has adequately assessed the impact of the proposed development upon trees and hedgerows along its route, however specific information on field boundary hedgerow removal to facilitate the widening of existing laneways or the creation of new 4 metre wide access tracks to the towers in the construction period is required, particularly in regard to cumulative impact.

2.8 Impact Upon Bio Diversity

In relation to bio diversity the County Development Plan states "*County Monaghan has a rich natural heritage, particularly in relation to its wide range of natural and semi-natural habitats including wetland, woodland, lake, river and upland habitats that support a wide range of plant and animal species. These areas are in the main extremely sensitive and are susceptible to any change that affects the ecological balance*."

2.8.1 County Development Plan Policies

There are five principal objectives relating to biodiversity in the Monaghan County Development Plan 2013-2019 relevant to the proposed development:-

Objectives for Biodiversity and Natural Heritage	
BDO 1	To protect, enhance and promote for current and future generations the rich biodiversity of County Monaghan.
BDO 3	Protect and enhance, plant and animal species and their habitats, which have been identified under the EU Habitats Directive, EU Birds Directive, the Wildlife Act and the Flora Protection Order.
BDO 4	Promote the retention, management and development of wildlife features such as hedgerows, riparian corridors, wetlands and other semi natural features that are essential for the migration, dispersal and genetic exchange of wild species. In exceptional circumstances, where it has been demonstrated to the satisfaction of the Planning Authority that the removal of habitats of local biodiversity value cannot be avoided, equal quantities of habitat must be reinstated. Details of which must be agreed with the planning authority.
BDO 6	Implement the actions of the Monaghan Biodiversity Action Plan 2009-2014 and any subsequent version.
BDO 7	Ensure that the Council, in the performance of its functions, takes account of the Ramsar Convention principle of conservation and wise use of wetlands as a contribution towards achieving sustainable development.

The following policy is also relevant:-

Policy for Biodiversity and Natural Heritage	
BDP 1	The Council will resist any development that may have a negative impact upon Biodiversity and Natural Heritage.

2.8.2 Natura 2000 Sites

There are two designated Natura 2000 sites within Monaghan:-
1. Kilroosky Lough Cluster Candidate Special Area of Conservation (cSAC)
2. Bragan Mountain Special Protection Area (SPA)

The following policies in the Monaghan County Development Plan are relevant to the proposed development:-

Policies for the Protection of Designated Sites	
DSP 1	Strictly protect areas designated or proposed to be designated as Natura 2000 sites (listed in Appendix 4). Development within or adjacent to these areas will only be permitted where it has been clearly demonstrated to the satisfaction of the planning authority that such development will have no significant adverse effects on the conservation objectives or integrity of these sites in accordance with the Habitats Directive.
DSP 2	Protect the NHA and pNHAs, listed in Appendix 4 by resisting development which would detrimentally impact on the conservation status or integrity of those sites. Development in these areas will only be permitted where it has been clearly demonstrated to the satisfaction of the Planning Authority that any such development will have no significant adverse effects on the integrity of these sites.

2.8.3 Proposed Natural Heritage Areas

The proposed development passes within close proximity of three proposed Natural Heritage Areas:-
1. Lemgare Rocks
2. Tassan Lough
3. Lough Egish

Lemgare Rocks pNHA (Between towers 107 and 108)
This site is a proposed Natural Heritage Area due to its geological interest.

Tassan Lough pNHA (South of towers 115, 116 and 117)
This small wetland site comprising a mesotrophic lake, reed swamp and transition mire covers an area of six hectares. This proposed Natural Heritage Area is of considerable conservation interest despite its small size, due to its diversity of habitats and vegetation and its fen habitat. This site is also part of the old lead mining complex and old spoil heaps are on site. The proposed development is routed away from Tassan Lough pNHA, so the impacts on site ecology will be neutral.

Lough Egish pNHA (South east of towers 161 to 163)
Lough Egish is primarily an area of ornithological scientific interest and it is a good over-wintering site for Whooper and Bewick's Swans and Goldeneye. Breeding birds recorded here include Black-headed Gull, Common Sandpiper, Lapwing, Coot, Great Crested Grebe, Little Grebe, Tufted Duck and Pochard. The lake has definite potential in terms of educational value, especially with regard to bird watching. The lake is easily accessible and there are no physical impediments to walking around the periphery of the lake.
Currently the proposed development is routed away from Lough Egish pNHA, so the impacts on site ecology will be limited.

2.8.4 Wetlands/Fens/Bog

Monaghan has experienced considerable loss of wetland and peatland habitats in the past, but now with an increased understanding of their importance for biodiversity and ecosystem services, and local obligations to contribute to the government commitment of "no net loss" of biodiversity, it is considered desirable to conserve these sites both by the local authority and nationally. The Monaghan County Biodiversity Action Plan stresses the particular importance of wetland habitats in the county, and the majority of actions in the plan focus on the understanding and conservation of these important habitats. Many of County Monaghan's important wildlife sites have no official designations, but survey work has shown that a high proportion of these undesignated sites are of national importance or B status.

The proposed development passes within close proximity of a number of wetlands:-

1. Cashel Bog / Lough Nahinch
2. Tassan Lough
3. Clarderry Bog
4. Ghost Lake,north of Coogan's Lough
5. Cornanure Fen
6. Lisduff Bog
7. Tullynahinera Bog
8. Tooa Bog
9. Bocks Lough
10. Raferagh Fen
11. Greaghlone Bog
12. Corlea Bog

These are a key group of habitats in County Monaghan for biodiversity, hydrology and landscape reasons and the proposed development has the potential to adversely affect their integrity.

Cashel Bog / Lough Nahinch (North of towers 119 and 120)
This site of 65.8 hectares consists of a complex of habitats including three lakes, extensive areas of poor fen and regenerating bog. It was surveyed in the Monaghan County Council Fen Survey (Foss and Crushell) and classified of B status or of national importance. It has been recommended for designation as a Natural Heritage Area.
The water table at this habitat complex is at the surface, as determined in the Monaghan Fen Survey. The site is extremely wet, with a surface water table and quaking vegetation of a high ecological quality.
This large site contains a complex of habitats including three lakes, extensive area of poor fen, regenerating bog, scrub, wet woodland and mixed broadleaf woodland. This large site is of ecological interest due to the diversity of habitats present accompanied by the undisturbed nature of the site. An extensive area of poor fen is of considerable interest. The site is deemed to be of high ecological value.
The line oversails the southern end of Cashel Bog (117-118), and the towers also avoids the adjacent species rich grasslands. Access routes for both towers avoid the wetlands and the species rich fields. (Habitat map 2).

Clarderry Bog (West of towers 127 and 128)
From 2005 aerial photography, it is apparent that this site contains a mosaic of wetland and peatland habitats, including some wet woodland. The OS 1836 map shows this site as being a much larger complex extending westwards to include six mile lakes, and northwards to include Little Lough, a lake which has now been completely drained. This site is avoided by the towers.

Ghost Lake,north of Coogan's Lough (West and southwest of tower 130)
The site known locally as Ghost Lake, is margined by rock outcrops, or moraines and very extensive undisturbed habitat with extensive areas of reed, rushes, and small areas of scrub. Swans, possibly mute use this site. The three lakes: Ghost, Drumgristin and Coogans and their associated habitats are avoided by the development.

Cornanure Fen (South of tower 138)
Tower 138 is on the northern edge of Cornanure, but neither the tower nor the access route impact on the site.

Lisduff Bog (Immediately south of tower 156)
The 1836 OS map shows that this site was part of the site at Tullynahinera. Although quite small in size, this remnant of an originally larger site merits an ecological survey. The proposed development will have no impact upon it.

Tullynahinera Bog (Within route corridor, between towers 158 and 159)
This is a large wetland / peatland complex, which although has had some drainage and has reduced in size in comparison to the 1836 map, still merits an ecological survey. Aerial photography shows that there is a mosaic of habitats present on site, which may include secondary fen habitats. Given the site size and information on other similar sites it is likely to be of C status or high value locally important. The towers are located away from this bog with only the line over sailing it.

Tooa Bog (ithin route corridor, north of tower 172)
This site of Ash-hazel woodland, is marked as woodland on the 1836 OS map, and is likely to be of at least county importance. The proposed location for the tower is at the southern margin of the site and has no impact.

Bocks Lough (East of tower 175)
Between towers 175-176 there will be a loss of 0.2 ha of wet woodland. This small spur joins to the wooded Bocks Lough to the west. An ecological assessment of this individual site should be undertaken to assess the impacts of the proposed development on it, and adjoining habitat at Bocks. It should be checked for protected and rare species and to determine the hydrological impacts of the alteration to the landscape.

Raferagh Fen (East of tower 198)
This is a large wetland complex with two small areas of open water and a mosaic of wetland habitats. The 1836 Ordnance Survey Map shows one continuous bog area with one area of open water. It is likely to have been cutover, and is now converting to secondary fen habitats. It as a fairly small lake of less than one hectare surrounded by fairly extensive wetland vegetation dominated by reed and tall sedge fen. This site is of national importance for dragonflies. It has a large population of the rare Irish Damselfly, and there is evidence that they are successfully breeding onsite.
This entire wetland site, comprising the two small water bodies and associated habitats, is just to the east of the proposed development. The corridor avoids the site completely and the impact remains neutral on the site ecology. Any proposed adjacent activities such as excavation or construction need to be assessed for their potential impacts on overall site hydrology and water quality, in light of the nationally important dragonfly population and the possible existence of EU habitats onsite.

*Corlea Bog (Within route corridor, between tower*s 206 and *207)*
Corlea is located 6.5 km west south west of Carrickmacross. The site is classified as of B status or of national importance and has been recommended in the report for designation as a Natural Heritage Area. This small site comprises an inter-drumlin wetland. The site is intersected by two secondary roads causing fragmentation of the habitats present. The roads split the site into three distinct sections; the eastern part, the central part and the southern part.
The eastern and southern parts contain a mosaic of disturbed habitats including wet willow scrub and wet grassland. These are very small wetland units that have been impacted by the adjacent road, infill and drainage. The central part of the site is a cutover raised bog with regenerating transition mire in the central part and poor fen / bog communities around the margin. There are a few remnants of raised Ling Heather (*Calluna vulgaris*) patches. Downy Birch (*Betula pubescens*) and Grey Willow (*Salix cinerea*) are scattered throughout this part of the site.
The transition mire is mainly dominated by Lesser Tussock Sedge (*Carex diandra*) with typical floating scragh species including Water Horsetail (*Equisetum fluviatile*), Bogbean (*Menyanthes trifoliata*), Greater

Spearwort (*Ranunculus lingua*) and Marsh Cinquefoil (*Potentilla palustris*). *Calliergon* spp. dominate the moss layer. Discrete patches of poor fen contain *Sphagnum fallax* and *Sphagnum squarrosum* carpets with Marsh Cinquefoil (*Potentilla palustris*), Common Cotton-grass (*Eriophorum angustifolium*), Marsh Violet (*Viola palustris*) and Wild Angelica (*Angelica sylvestris*). The transition mire and poor fen communities add to the ecological value of this small wetland site.
Corlea Bog (206-207) is oversailed from north to south across the site, but the towers are located outside the site. This site is of national importance. There may remain localised hydrological considerations/impacts for this site however.

2.8.5 Grasslands

As previously stated, 90% of towers are located on improved agricultural land. Potential impacts on biodiversity from the proposed development have been largely mitigated by route selection, avoidance of sensitive habitats including wetlands and by design. There will be 0.1 ha of loss at Annaglogh grassland (dry calcareous grassland) due to siting of towers 110 and 111. Although nationally important species rich grassland occurs at Cashel Bog, he towers 117 and 118 avoid the fields concerned and so do the access routes. No heavy machinery should be used in this area to trim or access trimming locations.

2.8.6 Birds

Whooper Swans
A major concern about the proposed development is the potential impacts of the development on the Whooper Swan populations that over-winter on the network of wetlands in the county. These birds over-winter in County Monaghan using a number of sites distributed over the county. They are listed on Annex I of the EU Birds Directive and are of conservation concern. It has been established that Whooper Swans are a susceptible species for collision risk with overhead power lines especially for juveniles and in poor light or misty/foggy conditions. Whooper Swans in Ireland overwinter from Iceland, and it is recorded in the Environmental Impact Statement that the JNCC consider the Icelandic population to be at a favourable conservation status. It is stated that the Irish population has increased between 2000 and 2005 by 11% and between 2005 and 2011 by 6%.
A Whooper Swan Survey was undertaken between 2007-2014 in respect of the impact of the proposed development. In relation to County Monaghan, the Whooper Swan Survey Census for 2010 states that there was a 16% increase in total swan numbers in the county between 2005 and 2010, and the mean brood size was 3.25%, well above the average for Ireland or Northern Ireland.

Flight lines between wetland sites and their regularity were examined as part of the assessment of the impact of the proposed development. It can be seen from the Environmental Impact Statement survey that the populations move around quite a bit in Monaghan, so even outside the three main areas of risk that were identified at Ballintra, Comertagh and Lough Mourne and Egish, birds use different sites depending on suitable feeding habitat becoming available. Birds flying between wetland sites for feeding or roosting tend to fly at lower heights.

Frost (2008) found that at a Special Protection Area reservoir in England in the spring of 2004, nine mute swans were killed through collision with the 132Kv power lines, while in spring 2006, 21 were killed. In the summer of 2006, over 500 red 'flight diverters' (320 mm long, 175 mm diameter) were installed at 5m intervals along a 1.5 km length of the power lines. In the spring of 2007 only one mute swan was killed through power line collision, while in spring 2008 none were killed. This study is used as justification for flight diverters in the Environmental Impact Statement for the proposed development. It is proposed that mitigation measures to reduce likelihood of collision risk will be designed into the scheme along the power lines at the three locations by using swan flight diverters of light grey PVC at 5m apart along each earth wire. The use of "grey" flight diverters in the respect of the proposed development is questionable, due to the prevalence of foggy conditions, and given that "red" diverters were used in the English study. Swan-

Flight™ diverters come in a range of colours, with grey being the standard colour. The US document 'Reducing Avian Collisions with Power Lines (Collision Manual)', updated in 2012, was used to inform the planning of the flight diverters for use in the proposed development. It is considered that other colours may be preferable (refer table 6.10 of the manual).

Swan Flight Diverters should be installed at the three main areas of risk, at 5m spacing as this appears to be appropriate spacing to reduce collision risk, but that the colour of the diverters is re-considered to ensure that they make the line visible at times of poor visibility.

Areas identified in the EIS for Swan-Flight Diverters are:-

Towers 196 to 203	Comertagh &Raferagh Loughs	2.5Km of earth wire to be marked
Towers 160 to 169	Lough Egish	3km of earth wire to be marked
Towers 139 to 147	Ballintra	2.8 km of earth wire to be marked

Due to the mobility of the species and the way in which they use wetlands in the area, it is also recommend that additional areas of the line are marked, even where there has been less swan traffic/flight lines noted in the past few years. It is noted that Whoopers were not tagged during the survey.

It is recognised that by marking the line to make it more visible to Whooper Swans and other birds that it also will become more visible to people, and stand out more in the landscape. However, reducing collision risk to Whooper Swans, a key ecological receptor, is of high importance.

Post construction monitoring for at least five years should be undertaken. Works should be undertaken outside over-wintering period close to the sensitive sites and tagging should be considered.

2.8.7 Conclusion

The Natura 2000 sites are located in the northeast of the County and therefore the proposed development is sufficiently removed from both the Kilroosky Loughs cSAC and Sliabh Beagh SPA so as not to have any impact upon their conservation objectives.
The Environmental Impact Statement has dealt with the sites individually to assess impacts, and tower locations are mapped on the habitat maps. It is noted that 90% of towers are located on improved agricultural land. Potential impacts on biodiversity from the proposed development have been largely mitigated by route selection, avoidance of sensitive habitats including wetlands and by design. Where a wetland is along the route, the towers are for the most part not on the wetland itself but on the adjoining agricultural land and the mapped access routes also avoid them. In a number of cases the line oversails a wetland. Where ecological sites are close to the alignment e.g. 60m away as in the case of Greaghlone Bog and Corvally, it is considered that it is not necessary to consider avoidance (as per table 6.8 of Volume 3C of the environmental impact statement). There may remain localised hydrological considerations/impacts for these sites however. The impact on wetland habitats in County Monaghan by the proposed development is localised, but a few outstanding issues remain as outlined above.
There are number of areas in the county where the environmental and heritage considerations combine to create particularly sensitive landscapes, and where impacts could combine to create a more significant impact than noted in the individual chapters. An Ecological Clerk of Works should liaise with the Archaeologist on site.
In respect of impact upon Whooper Swans, high visibility flight diverters should be used and monitoring should take place for a period of at least five years post construction for incidences of collisions, etc.

2.9 Impact Upon Architectural and Built Heritage

2.9.1 County Development Plan Policies

The three objectives relating to Architectural and Built Heritage in the Monaghan County Development Plan 2013-2019 relevant to the proposed development are:-

Objectives for Architectural and Built Heritage	
ABO 1	To secure the preservation of all sites and features of architectural and historical interest.
ABO 4	To protect historic demesnes and designed landscapes within the county from degradation and fragmentation.

Objectives for the Protection of Protected Structures	
PSO 1	Protect and/or conserve, as appropriate, all structures included in the Record of Protected Structures set out in Appendix 5.

The principal policy relating to Architectural and Built Heritage in the Monaghan County Development Plan 2013-2019 is as follows:-

Policies for the Protection of Protected Structures	
PSP 4	Resist development which is likely to adversely affect the setting of, designed landscape features of, or designed views or vistas to or from a protected structure, where the setting is considered of importance.

2.9.2 Assessment and Conclusion

Although the proposed development passes in the proximity of a number of protected structures and historic gardens, it is considered that it will have limited impact upon the integrity or setting of these structures.
The two main sites for consideration are Tully House and Shantonagh House, both to the south of the county. Towers 170-175 cross these two demesnes.

The EIS notes that "there will be a slight negative permanent impact on these historic demesnes" but it does not provide a breakdown on the rationale for this assessment. In assessing the previous application An Bord Pleanala specifically noted that the environmental impact statement should "Identify historic demesne landscapes along the route and assess potential impacts thereon".
Landscape maps should be provided showing the locations of the towers in these historic demesnes and rich areas of industrial heritage associated with milling; Reduff Mill is of particular note. The maps must clearly historic annotate the features potentially present in this area and analyse the impact of the OHL and towers on this landscape. This information should be supplemented with a topographical analysis and an understanding of this particular landscape, which differs from other areas in the county and for which impact assessment is not clearly outlined.

2.10 Impact Upon Archaeology

The modern County Monaghan is situated between the royal site at Tara and Emain Macha or Navan Fort in Armagh and thus Monaghan's archaeological resource has a regional context.

2.10.1 County Development Plan Policies

The principal objective relating to Archaeology in the Monaghan County Development Plan 2013-2019 relevant to the proposed development is:-

Objectives for the Protection of Archaeological Heritage	
AHO 1	Protect the monuments and places listed in Appendix 6 (and any additions by the National Monuments Service) to ensure that the importance of the setting of the monument or site, and its interrelationship with other archaeological sites is not materially injured, and that no development will impinge directly on any monument or site or on any associated archaeological material.

There are seven policies relating to Archaeology in the Monaghan County Development Plan 2013-2019:-

Policies for the Protection of Archaeological Heritage	
AHP 1	Safeguard the value of archaeological sites listed in the Record of Monuments and Places in Appendix 6 by strictly controlling any development that may prove injurious to the historical, archaeological, scientific, setting and/or educational value of any monument or place.
AHP 2	To ensure that development in the vicinity of a site of archaeological interest shall not be detrimental to the character of the archaeological site or its setting by reason of its location, scale, bulk, detailing or visual impact.
AHP 3	When considering development in the vicinity of archaeological monuments, the planning authority will aim to achieve a satisfactory buffer area between the development and the monument in order to ensure the preservation and enhancement of the amenity associated with the monument. This should be achieved in consultation with the Department of the Arts, Heritage and Gaeltacht. The areas of the monument and buffer areas should not be included within the required open space area of any development but should be in addition to such requirements.
AHP 5	When considering development in the vicinity of all archaeological monuments, the planning authority will require the preparation and submission of an archaeological assessment, detailing the potential impact of any development on both upstanding and buried structures and deposits. The report shall also include a visual assessment to ensure adequate consideration of any potential visual impact and should define the buffer area or area contiguous with the monument which will preserve the setting and visual amenity of the site. Where a monument or place included in the Record of Monument and Places lies within the open space requirement for a development, a conservation plan for that monument should be requested as part of the landscape plan for that proposed open space.

AHP 6	Require archaeological investigations at pre-approval stage where development is proposed on areas of archaeological potential.
AHP 7	Consider archaeological value when considering proposals for public service schemes, electricity, sewage, telecommunications, water supply and proposed road schemes where these impinge on or are in close proximity to Recorded Monuments and Places and/or Areas of Urban Archaeology. Where any subsurface archaeological features are discovered during the course of infrastructural/development works, these features should be preserved in-situ or preserved by record.
AHP 8	Have regard to Historic Landscape Character Assessments in assessing planning applications.

Recorded Archaeological sites

There is a strong band of recorded megalithic tombs running from north east to west across the county. There are 34 megalithic tombs recorded in County Monaghan indicating a similar concentration as adjacent counties of Cavan (59) and Louth (21). There are a further 16 possible megalithic tombs also listed on the Archaeological Inventory.

On the proposed route, there is a particular cluster of megalithic tombs in the area from Cornamucklagh South going northwards to Lennan. There may be added potential for archaeological evidence of Neolithic settlement or other monuments in this area. There is another cluster in the north east of the county in the few kilometres around Lemgare.

Black Pig's Dyke (Archaeological inventory 1230)

Monaghan County Council has been leading a regional Black Pig's Dyke project since 2014. This Bronze Age or Iron Age fortification is a recorded monument on the RMP (Fastry-Cornapaste) and there are obvious surface remains along some of its length in County Monaghan, at the east, south of Lough Muckno and to the west of the county south of Scotshouse. Discontinuous portions are visible in the following townlands:

- (MO016-012)-(MO021-011) Cornapaste, Annagheane, Killark, Drumavan, Skerrick West, Corrackan, Aghnaskew, Lattacrossan, Aghareagh West, Corrinary
- (MO022-022) Corrinary, Drumgrone, Corrinshigo
- (MO025-044) Maghernakill. Drumgristin

Although its location in this part of the county is not apparent in the present day, it should be noted that remains between the east and west portions may exist between the RMP squares 24 and 25.

Other Archaeological sites

There may be numerous other archaeological sites in close proximity to the development. Bronze Age Barrow cemeteries and cairns are less well represented in the county with only seven in Monaghan while there is 66 in Cavan and 41 in Louth. This may indicate that there are a lot of unrecorded bronze age archaeological sites in the county. Consequently, more information is required on the impact of the development upon them and a photographic analysis of the nature of these visual impacts should be provided, in order to assist in the assessment of impact. Impact on the monuments and their setting must be properly considered but no imagery suitable for assessing these impacts has been provided. Although copies of the LIDAR imagery that was used in the archaeological survey is referenced a number of times, no images are supplied for analysis and information. This LIDAR imagery would also be a useful tool for identifying previously unrecorded sites

2.10.2 Assessment and Conclusion

It is noted that the location of all towers avoid known archaeological sites but the potential remains that previously unrecorded items may come to light. There are a couple of instances where the over head line over sails a site on the Record of Monuments and Places, but these are very limited. Mitigation by

avoidance has been prioritised and any impacts are divided into construction impacts and operational impacts. Where there are operational impacts, and some of these are permanent and significant, it relates to the setting/visual and views from the monument rather than the removal or excavation of historic material. Potential construction impacts in relation to tower sites, stringing and guarding in proximity to known archaeological sites are dealt with by demarcation of the monument and pre-construction archaeological testing of the tower site under licence from the Department of Arts Heritage and the Gaeltachts.

Impact upon monuments and their setting should be properly considered. No imagery suitable for assessing the impact upon the monuments has been provided. In order to determine the nature and scale of these impacts, a photographic analysis of the nature of these visual impacts should be provided.

The archaeological information provided concentrates on sites, as distinct from archaeological landscapes. Additional information should be provided on significant historic landscapes, and the landscape setting of monuments, their Ordnance Datum, and the Ordnance Datum of the proposed towers.

MO027-077 at Corrinenty has the potential to be impacted due to the replacement of the pole set on the existing lines, which is 20m from the centre of the enclosure. This site is noted by the National Monument Service as sub-rectangular of 12.5 X 15.5 m, surrounded by a grass covered low stone wall with an entrance to the west side. This seems to be the most likely possibility for finding unrecorded archaeology.

The views from Lennan megalith(MO019-016) are particularly scenic and although the route will be 210 m to the east of the monument, this will have a significant and permanent impact on the monument. In addition, MO014-022 should be demarcated with a buffer during construction and access works.

A full photographic record of all archaeological sites which are assessed to have permanent operational impacts (Section 14.5.4.1 of Volume 3C of the environmental impact statement) should be undertaken by the applicant prior to the works commencing as part of the mitigation. This should concentrate on the monuments and their setting and include views to and from the monument and the landscape.

The impacts on the relationship between archaeological sites has not been addressed by the applicant.

2.11 Visual Assessment of Tower Design

2.11.1 Assessment

In Section 4.8.2 of Volume 3B of the Environmental Impact Statement four alternative types of tower were considered in the EIS based on a range of issues from extent of visual impact to electrical connections. The four alternatives were:-

1. Standard $NL-_{401}$
2. C-IVI-$_1$ tower
3. C-VVV-$_1$
4. Inverted Delta

2.11.2 Conclusion

The C-IVI-$_1$ has been selected by the developer on the basis of visual impact. It is concurred that of the four alternatives the C-IVI-$_1$ tower would have the least visual impact.

2.12 Impact Upon Public Roads

2.12.1 Assessment

The proposed development has impact upon the road system both during construction and in terms of maintenance. Consequently there is concern about the potential impact a project of this magnitude could have on a large number of local and regional roads in the County.

In particular there are concerns regarding the potential impact on the roads from the weight of construction traffic, the damaging effect that this will have, and the load bearing capacity of the roads to withstand this traffic. There are also concerns regarding the traffic and road safety capacity of the network to cater for the increased traffic during construction and the interaction of the construction traffic with other road users on the network.

2.12.2 Conclusion

The applicant has identified 117 temporary access points for the proposed development. A number of these access points are via narrow lane ways or field gates which are not capable of providing safe access to the public road or provide sufficient space to accommodate the off loading of construction materials. The applicant should submit details for the upgrading of these access points to accommodate delivery vehicles and submit proposals for the safe ingress/egress of traffic using these entrances.

The applicant has submitted estimated traffic generated per type of tower being constructed and indicated the potential increase of traffic on each of the haul roads. It would appear from Table 13.6 - Impact on Road Network that only one tower will be constructed on a particular haul route at any one time, the applicant should clarify that this is the intention and how it is proposed to monitor and enforce this scenario.

The applicant should be requested to submit distances from the edge of the public road to the base of proposed towers which are adjoining the roads network, in particular, Tower 142 which is adjoining Regional Road R183.

The applicant should clarify the position in relation to the responsibility for carrying out of road repairs required as a result of use of the public roads to construct the proposed development.

2.13 Impact Upon Surface and Ground Water

2.13.1 County Development Plan Policies

The three principal objectives relating to Surface and Ground Water in the Monaghan County Development Plan 2013-2019 relevant to the proposed development are:-

Objectives for Protection of Water	
WPO 1	Protect and improve County Monaghan's water resources.
WPO 2	All first order streams containing areas of stony/gravel bed and higher order streams are considered vulnerable and require protection in terms of water quality and physical structure. Such streams shall be identified and or the connectivity to such streams shall be identified in the water protection plan referred to in Policy WPP 5. All discharges to such streams should be assessed with a view to minimisation of risk to waters.
WPO 4	Protect rivers, streams and other water courses and maintain them in a state capable of providing and sustaining suitable habitats for flora and fauna, and where necessary designate riparian zone protection areas.
WPO 5	Achieve 'good status' in waterbodies and prevent deterioration of existing water quality status in all waterbodies in accordance with the Water Framework Directive.

There are also three principal policies relating to Surface and Ground Water in the Monaghan County Development Plan 2007-2013 relevant to the proposed development:-

Policies for Protection of Water	
WPP 1	In assessing applications for developments the Council will consider the impact on the quality of surface waters and will have regard to targets and measures set out in the Neagh Bann and North Western International River Basin Management Plans and where appropriate the Blackwater, Glyde, Fane, Woodford and Erne East Water Management Unit Action Plans.
WPP 2	In assessing applications for development, the planning authority shall ensure compliance with the European Communities Environmental Objectives (Surface Waters) Regulations, 2009 (S.I. No 272 of 2009) and the European Communities Environmental Objectives (Groundwater Regulations, 2010 (S.I. No. 9 of 2010).
WPP 3	Protect known and potential groundwater reserves in the county. In assessing applications for developments the planning authority will consider the impact on the quality of water reserves and will have regard to the recommended approach in the Groundwater Protection Scheme for County Monaghan. The employment of the methodology identified in the *Groundwater Protection Scheme for County Monaghan (*available at *www.gsi.ie)* and *Guidance on the Authorisation of Discharges to Groundwater (*available at www.epa.ie*)* will be required where appropriate.
WPP 5	Require submission of a water protection plan and detailed site drainage plans with all planning applications. Maps of sensitive areas and waters and a Water

	Protection Plan Checklist (Appendix 13) will assist in the preparation of plans at application stage.
WPP 6	Prevent further degradation of habitat by the promotion of riparian corridors and the prevention of any in stream works, or culverting of waterways unless in accordance with Inland Fisheries Ireland (IFI) guidance document *Requirements for the Protection of Fishery Habitat During Construction and Development Works at River Sites*. The IFI should be consulted prior to the submission of any plans involving works close to waterways.
WPP 7	No development shall be permitted within 200 metres of any lake that is the source of a water supply, where that development has the potential to pollute the lake.
WPP 11	Development which would have an unacceptable impact on the water environment, including surface water and groundwater quality and quantity, river corridors and associated wetlands will not be permitted.
WPP 12	Floodplains and riparian corridors will be maintained free from development to provide flood retention features within these areas.

2.13.2 Assessment

A project of this scale has potential to contaminate surface and to a lesser extent groundwater, therefore the additional information is required to assess the cumulative impact of the development.
A site specific (i.e. each tower or storage area) construction plan detailing the method to ensure the protection of all waters to the site is required. This plan should include existing surface water channels and groundwaters and any receptor that may be interfered with. Details such as silt traps, surface water management tools such as settlement ponds, bunded storage arrangements, pumping (dewatering) criteria and temporary pipework if necessary should be shown. Location of domestic wells should also be detailed. This site specific plan should detail access and egress arrangement that could potentially affect surface waters if site topography dictates. Additionally topsoil / subsoil storage layouts should be included and location of same should mitigate against runoff.
There is limited information regarding the phasing of the project. This will have a bearing on the duration of potential impact for each watercourse affected by the construction phase. A detailed construction programme specific to each tower or storage site should be submitted. This programme should identify the duration of the soil heaps, and open excavations exposed, which should be kept to a minimum to manage the risk of siltation of watercourses through runoff.

2.13.3 Conclusion

The Environmental Impact Statement (EIS) contains inadequate information in relation to the impact of the proposed development upon surface and ground water particularly at a specific site level.

2.14 Waste Generation and Disposal

2.14.1 County Development Plan Policies

There is one principal policy relating to Waste Generation and Disposal in the Monaghan County Development Plan 2013-2019 relevant to the proposed development:-

Policies for Waste Management	
WMP 4	Require all new developments to provide waste management facilities commensurate with their nature and scale.

2.14.2 Assessment

There will be significant amounts of material excavated to provide the foundations for the towers. The environmental impact statement contains inadequate information in relation to the scale of displaced material, the destination of disposal of displaced material, and the impact of the disposal of this material at these locations.
The applicant should identify specific permitted disposal sites relative to each site to minimise haulage and comply with regulations. The list included in the application is out dated as a number of the permitted sites mentioned are no longer opened. It is essential to identify all such sites in advance of any works taking place as large stockpiling of sub soils should not be permitted. All surplus material should be disposed of to permitted sites with permitted collectors and both categories of sites and collectors must be identified in each site specific plan.

2.14.3 Conclusion

The environmental impact statement has failed to properly address the consequences of waste generation and disposal.

2.15 Noise

2.15.1 County Development Plan Policies

There is one principal policy relating to Noise in the Monaghan County Development Plan 2013-2019 relevant to the proposed development:-

Policy for Noise Control	
NCP 1	The planning authority will seek to protect the amenity of individuals, dwellings, businesses, community facilities and other existing development, when assessing proposals for development that are likely to generate significant levels of noise.

2.15.2 Assessment and Conclusion

Noise from the proposed development can be divided between the impact at construction stage and the future operational impact of the proposed development.

Construction
The environmental impact statement has outlined detailed proposals that will be put in place at each construction site that will reduce the impact on the adjoining residents. It is accepted broadly that these proposals should reduce the said impact, however, it should be stipulate that the applicant would liaise with the local authorities prior to development at each site so as to ensure that the development would have the least possible adverse impact on the said residents. It should be noted that any works that would are proposed outside of normal working hours should be agreed with the planning authority prior to commencement of same.

Operational
Unlike the construction which is temporary, the operational impact of this development in relation to noise is permanent and can be categorised as the following:-

- Corona Discharge Noise
- Continuous Operational Noise
- Aeolian Noise
- Gap Sparking

These noise sources require specific technical assessment which are outside the normal noise complaint and enforcement scope of the local authority. A specialist consultant in this field should be employed to carry out a detailed report on the possible impact of this development on residents in relation to noise and other environmental issues.

2.16 Air Quality

2.16.1 County Development Plan Policies

There is one principal objective relating to Air Quality in the Monaghan County Development Plan 2013-2019 relevant to the proposed development:-

Objectives for Air Quality	
AQO 2	Promote the retention of trees, hedgerows and other vegetation, and encourage forestation and tree planting as a means of air purification and filtering.

There is one principal policy relating to Air Quality in the Monaghan County Development Plan 2013-2019 relevant to the proposed development:-

Policies for Air Quality	
AQP 1	In conjunction with the EPA, ensure that all existing and proposed developments are operated in a manner that does not permit them to contribute to any deterioration in air quality.

2.16.2 Assessment and Conclusion

The environmental impact statement has outlined proposals that will be put in place to reduce the impact of this development on air quality.

2.17 Impact Upon Tourism

2.17.1 County Development Plan Policies

The principal policy relating to Tourism in the Monaghan County Development Plan 2013-2019 relevant to the proposed development is:-

Policies for Tourism	
TOO 3	Resist development that would adversely affect the natural resources upon which tourism is based.

2.17.2 Context

Failte Ireland has long recognised that the future of Irish Tourism is inextricably linked to the quality of the environment. Our scenic landscapes, rivers and lakes, and cultural heritage are the bedrock upon which Irish Tourism has been built.

In the recently published policy document '**People, Place and Policy - Growing Tourism to 2025'** the importance of the landscape and the quality of our natural scenery and physical environment are acknowledged as key motivators for visitors. The report states that 'Developments which are clearly at odds with the prevailing quality of the natural environment and the rural or urban landscape are likely to damage the quality of the visitor experience'. Particular mention in the report is given to the significant infrastructural investments required for future energy needs and stresses the importance of ensuring that there is the right balance between meeting these needs and protecting our tourism assets.

The findings of the latest Visitor Attitudes Survey – Main Markets 2014 (Milward Brown for Failte Ireland) which recorded the views of 1,471 overseas holidaymakers to Ireland stress the importance of beautiful scenery (90%) and an unspoilt, natural environment (85%) both when visitors are considering Ireland for a holiday and also as a factor in helping to exceed their expectations when on holiday here (Beautiful scenery – 59%).

The importance of the landscape and environment in attracting tourists is especially true of County Monaghan. In the absence of flagship tourism attractions, the outdoor activity market – be it land-based or water-based, is one of the most important market segments for the county.

Product offerings in Co Monaghan under the outdoor activity market segment include activities such as:-

- Angling
- Forest parks
- Walking
- Cycling
- Golf
- Equestrian

The promotion of Monaghan as a destination for such activities may be impacted by the proposed development, particularly in terms of visual impact. A line of pylons constitutes a visual intrusion on the landscape and in a county which is invested in the promotion of its outdoor product, this may be significant.

2.17.3 Existing Tourism Products Directly Impacted

Angling

Angling is a hugely important product and tourist attractor for Co Monaghan. The towns of Ballybay and Castleblayney are key angling centres and many fishermen base themselves in this general lakelands area. There are a number of small lakes in this angling heartland and there is a concern that the proximity of the line of pylons to some of these lakes may impact on the angling amenity. Listed below are the important angling waters lakes which may be directly impacted visually by the proposed development:-

- Lough Egish - This 117 hectare lake is a valuable Pike Fishery.
- Lough Morne - This 45 hectare lake is a good game fishery and contains brown trout.

The general amenity value of the Castleblayney-Ballybay lakelands area may also be detrimentally impacted visually by the proposed development. Examples of lakes in the general vicinity of the proposed line include:-

- Corlatt Lake/Shantonagh Lake - These series of lakes drain into the Knappagh River and the River Annalee. It must be noted that the majority of these waters contain most of the coarse fish species with the exception of bream and tench but are regarded as very good pike fisheries.
- Tonyscallon Lake - This lake covers an area of approximately 3 hectares and contains very good bream.

Walking

The Monaghan Way is a long distance walking route from Monaghan to Inniskeen. It is a stimulating combination of quiet country roads, cross country trekking, riverside walkways and lakeside approaches. Reflecting the Monaghan countryside, the walk mixes gentle sloping hill gradients with flat stretches of open countryside. There are no long or steep climbs and the route reaches a maximum altitude of 317m at the summit of Mullyash.

The proposed development will have a negative visual impact on the section of the route in the Clontibret area.

2.17.4 Conclusion

Landscape and the natural environment are important in respect of tourism and the quality of these two elements are significant in attracting tourists to County Monaghan. The proposed development has the potential to adversely impact upon tourism in County Monaghan in general, due to the visual impact upon the landscape.

2.18 Impact Upon Existing and Permitted Development

2.18.1 Existing Development

The proposed development passes within close proximity of a number of farm complexes, dwellings and other businesses, and could have the potential to have a detrimental impact upon the extension/addition of buildings to these properties.

2.18.2 Permitted Development

The proposed development passes within close proximity to a number of permitted developments. The proposed development could have the potential to have a detrimental impact upon the extension/addition of buildings to these properties.

2.18.3 Conclusion

The environmental impact assessment has failed to properly consider the impact the proposed development will have upon the ability to extend/add to existing buildings in close proximity to it.

2.19 Temporary Storage Compound

2.19.1 Context

Although it has been stated in Paragraph 10 of Section 7.3.1 of Volume 3B and other documentation accompanying the application that the site of the proposed temporary storage compound had been previously in use as a storage compound during the construction of N2 By pass of Carrickmacross, this is incorrect. It is understood that the lands may have been used to dispose of some excavated material from the line of the by pass.

2.19.2 County Development Plan Policies

As the site is located in the open countryside outside any development envelope, the proposed development falls to be considered under the following specific policies:-

Policies for Landscaping	
LSP 1	Existing trees and hedgerows soften the visual impact of any new development, give shelter and maturity to the site, and should be retained. Development proposals which necessitate the removal of extensive amounts of trees and hedgerows will be resisted.
LSP 2	Proposed planting should use native, fast growing species such as ash, oak, hazel, blackthorn, holly, etc in preference to imported species such as Leylandii and Castlewellan Gold.
LSP 3	Careful consideration should be given to roadside boundary treatments and access. The disruption of existing boundary features should be avoided. Trees, hedgerows, stone walls and earthen embankments are an attractive part of the rural scene and should be retained. Where these have to be removed to provide the required sight distance, they should be reinstated behind the sight lines. The removal of excessive amounts of roadside vegetation should be avoided. Transplanting of existing trees and hedgerows should be employed where appropriate.
LSP 4	All planning applications for development should be accompanied by detailed proposals for site works and landscaping. These details should as a minimum include the following information; the number, species, location, height at planting, height at maturity, age to maturity and an implementation timescale for all proposed planting; a survey of all existing vegetation on site indicating their species, height and condition, together with detailed information on the number of plants to be removed/lopped/topped, etc.
LSP 5	The use of inappropriate or ornate boundary treatments, gates and piers which incorporate concrete balustrades, brickwork, blockwork, or other unsympathetic materials should be avoided.

Policies for Rural Accesses	
RAP 1	Access should be taken from existing lanes where practical.
RAP 2	New accesses should be positioned to minimise loss of hedgerow/trees.
RAP 3	New access lanes/roads should run alongside existing hedgerows/boundaries and should follow the natural contours of the site. Sweeping driveways should be avoided.

Policies for Parking	
PKP 1	New developments shall provide adequate provision within the site for servicing of the proposal and for the parking and manoeuvring of vehicles associated with it. New development proposals shall include parking and servicing arrangements in accordance with the minimum parking standards as set out in Table 15.2, Chapter 15, Development Management Guidelines, Monaghan County Development Plan 2013-2019.
PKP 3	Where the applicant cannot provide dedicated parking spaces, or can only provide the required number in part, the Council may accept a financial contribution in respect of the shortfall in the number of spaces. This will however, be at the discretion of the Council, and is likely only to apply to town centre locations where the Council has provided, or intends to provide additional public car parking spaces.
PKP 6	In exceptional circumstances, the Council may at their discretion accept a reduced parking requirement, where the applicant has clearly demonstrated that this would not impact on traffic safety, and where it is considered to be in the interests of the proper planning and sustainable development of the area.
PKP 7	Parking provision shall be located within or immediately adjacent to the site of the proposed development.
PKP 8	Planting and landscaping of all car parks shall be required.
PKP 9	In addition to the requirements of Table 15.2 in Chapter 15, Development Management Guidelines, Monaghan County Development Plan 2013-2019, all developments shall provide 1 no. additional parking space for people with disabilities, for every 25 no. spaces provided (in all instances this requirement should be rounded up). Each disabled space shall have minimum dimensions of 5.0 x 3.5 metres.
PKP 10	Where a retail/commercial or other development is proposed which requires the development of car parking facilities, provision will also be made for the secure parking of bicycles.

The appropriate car parking standard is as follows:-

Development type	Minimum parking space requirement^	Additional Requirements
Storage/Distribution	1 space per 200 sqm GFA*	Facilities are required for the parking and turning of vehicles servicing the development.

Section 15.23.2 of the County Development Plan specifies that sight distance for this type of development will be in accordance with NRA DMRB.

2.19.3 Assessment and Conclusion

It is considered that subject to retention of the vegetation on the boundaries of this site and additional landscaping where necessary, the temporary storage compound will be sufficiently integrated into the landscape.
In respect of the access no details of the visibility splays required by Monaghan County Development Plan have been indicated and no details of any loss of hedgerow to provide these visibility splays has been provided. There are also concerns that the existing vegetation will be lost to facilitate the erection of the fencing and sound barriers. Clarification is required in respect of this.
No plans in relation to the structures on site, such as temporary offices, portaloos and shelving/racks have been submitted. Details of numbers of staff attending and car parking is also required.
Given the proximity of the compound to an existing dwelling, there may be the potential for adverse impact upon the residential amenity of this dwelling.
A condition should be included within any grant of planning permission for restoration of the site to its original state following completion of the development.

2.20 General Comments

2.20.1 Micro Siting

It is noted in paragraph 54 of Section 2.3.4 of Volume 2A of the environmental impact statement that the applicant does not wish to avail of micro siting which permits the deviance of the permitted route of an electricity line within an 80 metres wide corridor (40 metres to either side of the permitted route) as provided for under Class 28 of Part 1 of Schedule 2 of the Planning and Development Regulations 2001. A condition withdrawing the provisions under Class 28 of Part 1 of Schedule 2 of the Planning and Development Regulations 2001 should be imposed on any planning permission granted.

2.20.2 Access Tracks and Facilitating Works

It is noted that in the majority of cases access tracks will not be constructed and any that are provided will be temporary mats or metal sheets. It is also noted that there will be larger working areas for towers 166 and 168. However no specific details have been provided within the environmental impact statement for each separate tower site including actual area on the ground and depth of excavation works. The precise locations of any access tracks that require extensive works has not been detailed either.

2.20.3 Flood Risk Assessment

Limited consideration has been given in the environmental impact statement in relation to flood risk, particularly in respect of the implications arising from the disposal of excavated material on adjoining lands.

2.20.4 Modifications to Existing 110kV Lines

It is noted that there are proposals to lower the existing 110kV over head electricity lines that pass under the proposed 400kV over head line to ensure adequate clearance between the two. Monaghan County Council has no objections to this part of the proposal.

2.20.5 Water Mains

As the proposed route of the development traverses existing water mains the developer shall take all necessary precautions to protect water mains from damage during construction. The developer should consult with Water Services Section of Monaghan County Council at least three months in advance of any work commencing.

2.21 General Development Contributions

Section 182D(5) of the Planning and Development (Strategic Infrastructure) Act 2006 permits An Bord Pleanala to attach to an approval such conditions as it considers appropriate. It is considered appropriate that the developer pays development contributions in accordance with this scheme. The current Monaghan County Council Development Contribution Scheme was adopted in 2013 and subsequently amended in 2014 under Section 48 of the Planning and Development Act 2000 (as amended).

The level of general development contribution (index linked) in respect of the provision of Community, Recreation and Amenity Infrastructure applicable to this proposed development is as follows:-

Category	**Development**	**Amount of Contribution**
5. Provision of Community, Recreation and Amenity Infrastructure	(n) The provision of overhead transmission or distribution lines for conducting electricity, or overhead telecommunication lines.	€20,020 per Tower €202,210 per Tower carrying power 400Kv or above

This position is supported by the decision by An Bord Pleanala under Section 37G of the Planning and Development (Strategic Infrastructure) Act 2006 in respect of the Gas Powered Electricity Generating Station at Toomes, Co. Louth (ref. PL 15.PA0001). In this decision An Bord Pleanala attached a condition (no.19) to the permission requiring that the developer pay general development contributions to both Monaghan County Council and Louth County Council in accordance with their respective development contribution schemes made under Section 48 of the Planning and Development Act, notwithstanding the fact that it was not granted under Section 38 of the Act.

2.22 Public Road Restoration Bond

Section 182D(5) of the Planning and Development (Strategic Infrastructure) Act 2006 permits An Bord Pleanala to attach to an approval such conditions as it considers appropriate.

The proposed development will use the public road network for the delivery, construction and maintenance of the development. The traffic associated with the construction and long term maintainence/renovation of the development may have a detrimental impact upon the public road network which has been provided by the local authority. Therefore, the developer should be obliged by condition imposed on any planning permission to lodge a bond of an appropriate amount with Monaghan County Council as surety for the restoration of damage caused to the public road network as a result of the construction, maintainence or renovation of the development. A condition should also be imposed upon any permission requiring the developer to carry out pre construction and post construction surveys of the public road network to be used for the construction of the development.

2.23 Community Gain Fund

Section 182D(6) of the Planning and Development (Strategic Infrastructure) Act 2006 permits An Bord Pleanala to attach to an approval a condition relating to "*the construction or the financing, in whole or in part, of the construction of a facility, or the provision or the financing, in whole or in part, of the provision of a service in the area in which the proposed development would be situated, being a facility or service that, in the opinion of the Board, would constitute a substantial gain to the community*."

It is stated in paragraph 61 in Section 5.5.3 of Volume 2A of the Planning Report that the applicant will contribute €40,000 per kilometre to a once off fund, to be administered with direct input from the relevant local authority and other relevant bodies or agencies, for the benefit of communities in proximity to the proposed over head lines.

It is considered reasonable that the developer should make a contribution to this fund which will be of benefit to the community in the area.

2.24 Major Incident Provisions

2.24.1 County Development Plan Policies

The two principal policies relating to Major Incident Provision in the Monaghan County Development Plan 2013-2019 relevant to the proposed development are:-

Policies for Major Accidents Directive	
MAP 1	Protect areas of particular natural sensitivity or interest in the vicinity of establishments covered by this Directive, through appropriate safety distances or other appropriate measures where necessary.
MAP 2	Facilitate the implementation of the "Seveso II and III" major accidents directives in respect of the siting of new establishments, modifications to existing establishments and major infrastructure projects including any proposed gas pipeline, rail links and major roads.

2.24.2 Assessment and Conclusion

The environmental impact statement has failed to make reference to any potential impacts or mitigation measures relating to structural failures in either the towers or the conductor lines and the resulting impact upon adjoining properties and sites of bio diversity.

3.0 Comments by Elected Members

3.1 Background

The comments below represent the views of the elected members of Monaghan County Council and have been collated following the discussion of the proposed development by the elected members at a special meeting of Monaghan County Council on 12th August 2015.

3.2 Inconsistent Application of Policy

- Government policy is being applied differently in different parts of the country in respect of undergrounding.
- Options were given to the public in regard to the Gridwest and Gridlink projects that have not been given to the people of County Monaghan.
- The rights and treatment afforded to people in other counties such as Mayo should be reflected in Monaghan.

3.3 Principle

- No extra electricity supply would be brought to Monaghan as a result of the interconnector and thus the development should not be imposed on the county.

3.4 Lack of Consideration of Undergrounding

- No opportunity has been given for the community to comment on undergrounding and the county had been treated quite differently in comparison to other EirGrid projects.
- The possibility of undergrounding the interconnector under sea, as with the Wales interconnector, should be investigated.
- Undergrounding would protect visual amenity.
- Overhead method of transmission is a significant concern and there is inadequate consideration of undergrounding.
- It is technically and financially possible to place the cables underground.

3.5 Inadequate Consideration of Alternative Routes

- The Environmental Impact Statement has not justified the interconnector going through Monaghan.
- The reasons why the project should go through Monaghan are not convincing and other options should be considered.

3.6 Impact Upon Human Health

- The World Health Organisation defines health as “a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity” and this is being totally ignored by EirGrid and is impacting on people’s lives.
- As the Department of the Environment, Community and Local Government Panel on Electromagnetic Fields had not yet reported, consideration of the application is inappropriate.
- The food chain could be affected as grass eaten by milk producing cows and cattle could be tainted by the overhead power lines and this milk and beef could then enter the food chain.
- Noise from the overhead lines could have a severe impact upon people with noise sensitivity issues.
- The health impacts of the development is the most important aspect and more information should be made available on the potential and perceived health impacts of the project.

3.7 Inadequate Application Details

- The application cannot contain accurate information as EirGrid has not gained access to most of the affected lands.
- The application should fail at the first hurdle of assessment.
- An Bord Pleanala should reject the application as it is not up to scrutiny and is fundamentally flawed.

3.8 Contrary to Monaghan County Development Plan 2013-2019

- The project is a complete violation of the objectives and policies of the Monaghan County Development Plan 2013-2019.
- Policy EGP3 of the Monaghan County Development Plan 2013-2019 states that "The undergrounding of electricity transmission lines shall be considered in the first, as part of a detailed consideration and evaluation of all options available in delivering and providing this type of infrastructure, "and undergrounding has never been given as an option.

3.9 Visual Impact

- The concerns regarding significant visual impact are such that if this was a conventional application it would result in planning permission being refused.
- Given the significant visual impact of the proposed development it should be refused.

3.10 Impact Upon Lakes

- Shantonagh Lake will be adversely affected by the development.
- Overgrounding has been imposed on the people of Monaghan and pylons will destroy the beauty of the county.
- An option of undergrounding should have been put to the people first.
- This application should be put on hold and options of undergrounding should be put wholly and honestly to all.

3.11 Impact Upon Tourism

- The development will adversely impact upon tourism in County Monaghan.

3.12 Impact Upon Heritage

- A tiled lake at Drumillard, Lough Egish which could be of heritage importance and two mills (Reduff Mill and Harrison's Mill) at Shantonagh will be adversely affected.
- The development will have significant impact on the landscape and wildlife.
- Paragraph 11.2.8, item 35, page 11-8, notes that photomontages do not show "the more permanent localised trimming or removal of taller vegetation within falling distance of any part of any overhead line support or conductor" Why is this not included in the photomontages?
- The statement that there will be no ecological impact on Tassan Lough is incorrect ,the locally known "blind lough area" about 6 acres of wetland which adjoins the lough extends to an area underneath the powerline - dragon flies, snipe, newts, etc
- The development passes close to Lemgare Rocks and Drumgallen bog pNHA close to Drumcarn ASSI. A report for Environment and Heritage Service by Brian Nelson (2000) states:-

"*5.2.2 Drumcarn/Drumnahavil*

Drumcarn/Drumnahavil is a large area of cutover bog, wet heath and fen on the Armagh/Monaghan border. The Armagh portion of the site consists of rocky outcrops covered in dry heath, dense gorse scrub and bracken, with numerous shallow peaty pools separated by narrow ramparts of uncut peat. Succisa was scarce, growing in small clumps or as single plants. Much of the site is unsuitable for Succisa and consequently the Marsh Fritillary, being either too wet or covered in dense scrub. The records do indicate that there is a colony in the area. However, as the Armagh portion of this site is considered unlikely to support a large colony in its present condition, the conclusion must be that this colony is maintained on the Monaghan side of the border."

3.13 Impact Upon Bats

- Inadequate surveys have been carried out in relation to bats.

3.14 Impact Upon Agriculture

- The food produced in Monaghan will not have the same status because of the overhead power lines.

- There will be an impact on future agricultural payments to farmers as they must declare if development has taken place on their lands, adding if farmers did have structures on set a side land they would lose compensation.
- There could be an issue in relation to farm safety as some wires were coming as close as 20 metres in some instances.
- As farm accidents are on the increase it is important that consideration is given to health and safety on farms.

3.15 Damage to Public Road Network

- The proposed development will result in damage to the public roads network and Monaghan County Council should not be expected to fund the repairs.

3.16 Inadequate Access Arrangements

- A lot of the roads and lanes that are proposed to be used were not designed for large vehicles such as 35 tonne lorries.
- The access lanes proposed to deliver materials to the tower sites were inadequate and are no more than horse and cart tracks.
- There are no site distances / visibility splays provided for access in and out of tower sites and this will lead to a health and safety issue.

3.17 Impact Upon Property

- There will be a loss of development rights where the line crosses land and near the pylons.
- There will be obvious devaluation of property.
- There should be compensation given to those landowners where no structures were on their lands but the line crossed their lands and compensation should recompense them for the development sterilising their land.

3.18 Noise Impact

- An independent specialist with regard to noise pollution should be engaged.

3.19 General

- There will be enormous social, economic and health impacts from the proposal.
- It is important to consider the legacy of this project will leave including the impact on the landscape, economic development and health.
- The project will have a negative impact on jobs and if it went ahead, there would be no economic development in the vicinity of the structures.
- The project is causing conflict between neighbours and within communities.
- The Chairman of Eirgrid Mr. John O'Connor has previously stated at an Oireachtas Committee meeting that he would not like to live beside a pylon. The Chief Executive of Eirgrid, Mr. Fintan Slye has stated to the same Oireachtas Committee that an underground option is feasible, can be engineered and Eirgrid have never conducted any consultation in this regard. If it is feasible, then the lines should be placed underground.