Statement of evidence from Monaghan County Council to the Oral Hearing in the matter of the proposed single circuit 400kV overhead transmission line and associated structures (Cavan-Tyrone 400kV Interconnector)

An Bord Pleanala Ref: 02.VA0006

14<sup>th</sup> May 2010

Toirleach Gourley Senior Executive Planner

- 1. This presentation is delivered on the basis that the written submission by Monaghan County Council to An Bord Pleanala in respect of the proposed interconnector development is taken as read and will be included in the record of the oral hearing. Consequently, this presentation does not comprise a reiteration of that submission, but rather highlights the key issues contained within it.
- 2. For the purpose of clarity I would explain that the written submission was structured into two parts. The first part contained a technical assessment of the proposed development by the executive of the Council. The second part contained the comments of the elected members of the Council.
- 3. For the benefit of the hearing I would advise that the technical assessment was carried out by six different authors, all with particular specialisms. The authors are:-
  - Toirleach Gourley, Senior Executive Planner
  - Shirley Clerkin, Heritage Officer
  - John McGrath, Senior Engineer, Roads Section
  - Martin Murray, Senior Engineer, Environment Section
  - Dympna Condra, Tourism and Marketing Executive
  - Dermot McCague, Environmental Health Officer
- 4. The attached appendix details the various contributors to the technical assessment and the relevant sections prepared by them. Each of these contributors will be available for cross examination if requested to do so.
- 5. This presentation does not take cognisance of any new evidence/information presented at the oral hearing to date or other evidence/information yet to be presented. Consequently, Monaghan County Council wishes to reserve the right to make further comment on the evidence/information presented during the oral hearing at the closing submissions stage of the hearing if deemed necessary.
- 6. In respect of the second part of the written submission, it should be noted the elected members will present their comments in association with individual/party presentations to the oral hearing.
- Monaghan County Council acknowledges that the delivery of the proposed electricity interconnector is in accordance with Government policy. Notwithstanding this Monaghan County Council have outlined a number of concerns that are pertinent to the consideration of the proposal.

## 8. Consideration of Alternatives

The executive of Monaghan County Council having considered the submitted EIS was of the opinion that there is limited justification within the EIS for routing of the interconnector through County Monaghan.

#### 9. Impact upon Landscape Heritage

The executive of Monaghan County Council having considered the submitted EIS was of the opinion that there was an inadequate assessment of the impact upon landscape heritage in the EIS. No reference has been made within the EIS to the adopted County Monaghan Landscape Character Assessment and no Zone of Visual Influence (ZVI) Assessment has been included within the EIS to assist in the determination of the visual impact of the proposed development. No justification has been given within the EIS for the positioning of towers on upper slopes of drumlins along the proposed route. The photomontage within the EIS is inadequate and the resultant impact of 'micro-siting' of towers during construction is not considered within the EIS.

# 10. Impact upon Areas of Primary and Secondary Amenity

The executive of Monaghan County Council having considered the submitted EIS was of the opinion that there is an inadequate assessment of the impact upon areas of primary and secondary amenity by the proposed development and concluded that the EIS has failed to properly assess the potential for impact with no ZVI assessment having been carried out to assist with this assessment of impact.

#### 11. Impact upon Views and Prospects

The executive of Monaghan County Council having considered the submitted EIS was of the opinion that there is an inadequate assessment of the impact upon views and prospects of the proposed development and concluded that the EIS has failed to properly assess the potential for impact with no ZVI assessment to assist in this process. Reference was also made to the misidentification of scenic routes.

#### 12. Impact upon Lakes and their environs

The executive of Monaghan County Council having considered the submitted EIS was of the opinion that there is an inadequate assessment of the impact upon lakes and their environs by the development and concluded that the EIS has failed to properly assess the impact nor propose any mitigation measures.

## 13. Impact upon trees and hedgerows

The executive of Monaghan County Council having considered the submitted EIS was of the opinion that there is an inadequate assessment of the impact upon trees and hedgerows by the proposed development and concluded that the EIS has failed to properly assess the impact nor propose any mitigation measures.

## 14. Impact upon Bio Diversity

The executive of Monaghan County Council having considered the submitted EIS was of the opinion that there is an inadequate assessment of the impact upon bio diversity and concluded that the EIS has failed to properly assess the impact nor propose any mitigation measures. Impact of 'micro-siting' of towers was not considered, and it was determined that there will be significant negative impact upon Cashel Bog and Corlea Bog. It is also considered that the ecological impact assessment is required where development passes through wetlands. The information provided in the EIS with regard to birds was considered inadequate. The Whooper Swans survey was deemed to be inaccurate and the development is considered to pose a collision risk. No botanical surveys were undertaken on the ground and detailed habitat surveys and ecological impact assessments are deemed necessary. Flora and fauna classifications were considered limited and no detail on protected flora was provided. The status of sites was incorrectly transcribed into EIS and a constraints map showing all features of natural and cultural heritage is deemed necessary.

## 15. Impact upon Architectural and Built Heritage

The executive of Monaghan County Council having considered the submitted EIS was of the opinion that there is limited impact upon the integrity or setting of these structures.

## 16. Impact upon Archaeology

The executive of Monaghan County Council having considered the submitted EIS was of the opinion that there will be significant visual impact on a number of sites of archaeological interest. It is considered that photographic analysis and photomontages are necessary to ascertain impact. Information on significant historic landscapes, the landscape setting of monuments, their Ordnance Datum (OD), and the OD of the proposed towers is also required. It is considered that there is moderate negative visual impact upon four sites and significant negative visual impact upon four sites. There is also no consideration of potential archaeological sites.

# 17. Visual Impact of Towers

The executive of Monaghan County Council having considered the submitted EIS was of the opinion that the tower type selected has least visual impact of four options proposed but that the EIS contained limited information on impact at each location, particularly in respect of micro-siting.

#### 18. Noise

The executive of Monaghan County Council having considered the submitted EIS was of the opinion that there is an inadequate assessment of the impact of noise upon sensitive receptors in the vicinity of the development.

## 19. Impact upon existing and permitted development

The executive of Monaghan County Council having considered the submitted EIS was of the opinion that there is an inadequate assessment of the impact upon existing and permitted development, particularly in respect of micro-siting. It is also considered that the EIS has not addressed devaluation of property.

## 20. Impact upon Roads

The executive of Monaghan County Council having considered the submitted EIS was of the opinion that there is an inadequate assessment of the damaging effect that the weight of construction traffic will have on local roads, and the load bearing capacity of the roads to withstand this traffic. The executive of Monaghan County Council was of the opinion that there is an inadequate assessment of the traffic and road safety capacity of the network to cater for the increased traffic during construction, and. also the interaction of the construction traffic with other road users on the network. It is considered that the EIS has not addressed potential for any facilitating/improvement works necessary and that no detail has been given on any entrances/accesses from the public road and proposals for visibility splay provision. It was deemed that control of storm water flowing from entrances onto the public road has not been considered. There was limited information regarding the phasing of the project and there was no detail regarding traffic management. It was considered that the EIS has not detailed current structural conditions of roads nor provided any proposals to protect the integrity of these roads. No detail has been given in terms of haulage of excavated/waste material to disposal sites. It was also considered that there was no detail of roads maintenance during the construction phase, nor was there any proposals for repairs/re-instatement.

## 21. Waste Generation and Disposal

The executive of Monaghan County Council having considered the submitted EIS was of the opinion that there was inadequate detail in relation to the scale of displaced material, the destination of disposal of displaced material, the impact of the disposal of this material at these locations, and the impact of the proposed development upon the local road network in relation to disposal of waste.

## 22. Impact upon Surface and Ground Water

The executive of Monaghan County Council having considered the submitted EIS was of the opinion that no proposals had been included in EIS to ensure the protection of all water bodies from contamination. It was also considered that there is limited information regarding the phasing of the project particularly in respect of storage of spoil.

#### 23. Impact upon Tourism

The executive of Monaghan County Council having considered the submitted EIS was of the opinion that there was inadequate assessment of the impact of the proposed development upon the character of the County's landscape and the natural environment given its importance to tourism in the County. It was considered that the proposed development has potential to impact adversely upon the Monaghan Way, a number of fishing attractions, a shooting range, a riding school, and a health spa. It was also considered that the development has potential to adversely impact upon future tourism developments in the-County such as Lough Muckno Leisure Park, which rely on quality of landscape as an attraction.

## 24. General Development Contributions

The executive of Monaghan County Council was of the opinion that general development contributions should be levied on the development in line with An Bord Pleanala decision PL 15.PA0001. (Quinn Power Station at Toomes, Co. Louth)

## 25. Special Development Contributions

The executive of Monaghan County Council was of the opinion that special development contributions should be levied on the development in line with An Bord Pleanala decision PL 15.PA0001.

#### 26. Community Gain Fund

The executive of Monaghan County Council was of the opinion that a community gain fund should be levied on the development in accordance with Section 182D(6) of the Planning and Development (Strategic Infrastructure) Act 2006 and in line with An Bord Pleanala decision PL 15.PA0001.

# 27. Major Incident Provisions

The executive of Monaghan County Council was of the opinion that the EIS has failed to make reference to any potential impacts relating to structural failures in either the towers or the conductor lines and has failed to include any mitigation measures.

## 28. General Comments

Micro siting - The executive of Monaghan County Council having considered the submitted EIS was of the opinion that inadequate consideration has been given of the impact of the construction of the line any where within this corridor.

Temporary Works - The executive of Monaghan County Council having considered the submitted EIS was of the opinion that limited information was provided in relation to location and extent of temporary access tracks.

Flood Risk Assessment - The executive of Monaghan County Council having considered the submitted EIS was of the opinion that limited consideration has been given to flood risk in the EIS.

Transboundary Implications - The executive of Monaghan County Council was of the opinion that the EIS made inadequate reference to this fact and the impacts of micro-siting in this regard.

# **Appendix 1 - Details of Contributors to Technical Assessment**

Section	Topic	Author
2.1	Principle of Proposal	Toirleach Gourley
		Senior Executive Planner
2.2	Consideration of Alternatives	Toirleach Gourley
		Senior Executive Planner
2.3	Impact upon Landscape Heritage	Toirleach Gourley
		Senior Executive Planner
2.4	Impact upon Areas of Primary and Secondary Amenity	Toirleach Gourley
		Senior Executive Planner
2.5	Impact upon Views and Prospects	Toirleach Gourley
		Senior Executive Planner
2.6	Impact upon Lakes and their environs	Toirleach Gourley
		Senior Executive Planner
2.7	Impact upon trees and hedgerows	Toirleach Gourley
		Senior Executive Planner
2.8	Impact upon Bio Diversity	Shirley Clerkin
		Heritage Officer
2.9	Impact upon Architectural and Built Heritage	Toirleach Gourley
		Senior Executive Planner
2.10	Impact upon Archaeology	Shirley Clerkin
		Heritage Officer
2.11	Visual Impact of Towers	Toirleach Gourley
	·	Senior Executive Planner
2.12	Noise	Dermot McCague
		Environmental Health Officer
2.13	Impact upon existing and permitted development	Toirleach Gourley
		Senior Executive Planner
2.14	Impact upon Roads	John McGrath
		Senior Enqineer
2.15	Waste Generation and Disposal	Martin Murray
		Senior Enqineer
2.16	Impact upon Surface and Ground Water	Martin Murray
		Senior Enqineer
2.17	Impact upon Tourism	Dympna Condra
		Tourism and Marketing Executive
2.18	General Development Contributions	Toirleach Gourley
		Senior Executive Planner
2.19	Special Development Contributions	Toirleach Gourley
	·	Senior Executive Planner
2.20	Community Gain Fund	Toirleach Gourley
	·	Senior Executive Planner
2.21	Major Incident Provisions	Toirleach Gourley
		Senior Executive Planner
2.22	General Comments	Toirleach Gourley
		Senior Executive Planner