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14th May 2026

Re: Planning Compliance Submission for Condition 3 of ABP Reference 02.VA0017 – North-South 400 kV Interconnector Project

Dear Sir,

I refer to the letter dated 18th February 2026 on the North-South 400 kV Interconnector project 02.VA0017. Please find below ESB's comprehensive response to the matters raised therein.

Following consideration of the queries raised in your letter, ESB has updated the Construction Environmental Management Plan (CEMP), Traffic Management Plan (TMP) and Resource Waste Management Plan (RWMP). These updated documents are submitted herewith in response.

Responses to the matters raised are contained in the attached tables, which identify where information relevant to each point can be found within the submitted documents.

We would like to request a meeting with Monaghan County Council to discuss the management plans that are being submitted as this may assist in their review.

I look forward to your response and if you have any queries please contact the undersigned at brendan.allen@esb.ie or 086 8336990.

Yours sincerely,



Brendan Allen FIPI

Planning and Environmental Group Manager

Construction Environmental Management Plan (CEMP)		
No.	**MCC Comments - Feb 2026**	**ESB Response - May 2026**
1	It is stated in the cover letter submitted that addendum documents for each work package will be submitted in due course to Local Authorities for agreement prior to construction works commencing at the specific work package areas, as detailed in the CEMP. A CEMP for all work packages is required to be agreed with Inland Fisheries Ireland. Due to seasonal restrictions and other considerations Inland Fisheries Ireland should be consulted well in advance in relation to works in or near watercourses. The CEMP is required to be updated accordingly following consultation with Inland Fisheries Ireland in respect of all work packages and resubmitted.	The updated CEMP now includes a Surface Water Monitoring Protocol for all watercourses in proximity to proposed works including those in County Monaghan. There are no instream works proposed related to construction work in County Monaghan. There are four watercourses in Monaghan that will be within 50m of tower locations (or 20m from the 30m x 30m working area). A list of these watercourses along with the Surface Water Monitoring Protocol are outlined in Section 4.3.2 and Table 4.1 of the updated CEMP. Consultation with IFI in relation to the Surface Water Monitoring Protocol has commenced and the CEMP will be updated accordingly following any changes.
2	It is stated in Table 1.1 within the CEMP that in relation to the material storage yard temporary stockpiles will be created for offsite disposal or onsite storage for reuse. However, there are no details provided in relation to the amount of material to be stored on site and the amount of material for off site disposal. These details should be submitted.	Site Investigations will be carried out at the MSY to determine the volumes of material for onsite storage or offsite disposal. Material up to 7,000m^3 can be removed offsite as waste, as noted in Section 5.6 of the Inspector's Report. Section 4.1 of the CEMP has been updated to reflect this.
3	It is noted in Table 1.1 that there is no methodology provided for the overhead line construction. These details should be entered into Table 1.1 and submitted.	Table 1.1 has been updated with relevant reference information. - Section 3.4.2 of the CEMP contains the methodology for the overhead line construction. - Volume 3B Chapter 6 Description of the Development - Volume 3B Chapter 7 Construction - Also, please refer to Appendix 6 - *400 kV North South Interconnector Constructability Report* of the CEMP for a description of tower construction methodology from a trial conducted.
4	In relation to the details of appropriate geophysical surveys of construction sites in the vicinity of towers 103 to 118, it is noted that Ground Penetrating Radar (GPR) surveys have only been undertaken at four tower locations to date (Towers Nos. 106, 111, 112 and 113) and no details have been provided of these surveys. Details of appropriate geophysical surveys for all of towers 103 to 118 should be submitted.	The results of the four completed GPR surveys are contained in Appendix 5 of the CEMP (106, 111, 112 & 113). The remaining 12 sites will be surveyed on appointment of contractor - once reports are complete, they will be issued to MCC. Section 3.2.3 has been updated in the CEMP with this reference.

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5	In respect of the details of site specific arrangements for each temporary access route, it is noted that only two examples have been provided for four tower locations (Towers 111, 112, 113 and 144) out of 109 towers, and that these examples lack site specific details in respect of stepping down vehicle size, offloading of materials, short term road closures, the phasing of construction works, transfer and management of concrete, including wash out facilities, particularly where public road widths are severely restricted. It is also noted in one of the examples provided that the indicated existing access opening onto the public road for tower 144 does not appear to exist. Details of site specific arrangements for each temporary access route, to include, where necessary, arrangements for stepping down vehicle size, arrangements for off-loading of materials, short term road closures, the phasing of construction works which are accessed by single lane carriageways, and the arrangements for the transfer and management of concrete, including wash out facilities should be submitted.	Access Route Maps and Temporary Traffic Management drawings have been created for County Monaghan tower locations. The Access Route Maps (for all 109 towers) are included in Appendix 3 of the CEMP while the Temporary Traffic Management drawings are located in Appendix 1 of the TMP. Additional commentary relating to construction methodologies, tower site layouts, concrete wash out, and transport of plant and material to tower sites is provided in the Constructability Report in Appendix 6 of the CEMP. Section 3.2.2 - Stepping Down and Section 3.2.3 - Off Loading Construction Vehicles of the TMP has also been updated. Access Map 144 has been updated to reflect the proposed access location. This is indicated by the orange dot on the map, refer to Appendix 3 of the CEMP drawing reference PE687-D422-042-022. ESB will arrange a meeting with Monaghan County Council Municipal District Engineering Staff, with anticipation to meet over the coming weeks to discuss traffic related details.
6	It is noted that no arrangements in respect of pre and post-construction road surveys have been provided. Details of these surveys are required to be agreed with Monaghan County Council Municipal District Engineering staff and submitted for agreement by the planning authority.	ESB will complete all necessary pre and post construction road surveys. Section 3.2.2 of the CEMP has been updated to provide more information on pre and post construction road surveys. ESB will arrange a meeting with Monaghan County Council Municipal District Engineering Staff, with anticipation to meet over the coming weeks to discuss the arrangements of pre and post construction road surveys.

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7	It is noted that details of the locations for water quality monitoring and the proposed water quality monitoring protocols in respect of surface water bodies have only been provided for the material storage yard and these details are insufficient. Details of all of the locations for water quality monitoring and the proposed water quality monitoring protocols in respect of surface water bodies should be submitted	There are no EPA mapped watercourses within 1km of the material storage yard. There is currently a drainage ditch located to the east of the site, which has been dry on previous site visits. As stated in the CEMP, visual inspections will be carried out on the adjacent drainage channel checking siltation, discolouration, slicks, visible oils and grease etc. Updates to the CEMP now include full details of the proposed Surface Water Monitoring Protocol and list watercourses that will be monitored. There are four watercourses in County Monaghan that will be within 50m of tower locations, these watercourses along with the Surface Water Monitoring Protocol are outlined in Section 4.3.2 and Table 4.1 of the updated CEMP.
8	Although some details have been provided in respect of monitoring of water levels and water quality in wells within 100 metres of the proposed alignment no specific details of the location of such wells have been provided and no specific mitigation measures have been provided. Details of monitoring of water levels and water quality in all wells within 100 metres of the proposed alignment should be submitted.	Section 4.3.3 of the CEMP has been updated in response to this comment. A GIS exercise was carried out using the latest GSI data to identify wells in proximity of the works. As a precautionary measure, wells within 130m of tower locations and 110m of the OHL alignment were identified. Four wells were found to be within the buffer zones in County Monaghan - 2 wells at Tower 155, 1 at Tower 168 and 1 at Tower 178. The presence of these wells will have to be confirmed with landowners. In addition to this, ESB representatives will confirm with all landowners whether there is a well located in the vicinity of the sites, prior to construction commencing and Access Route Maps will be updated accordingly (Appendix 3 of the CEMP). Section 7.5 of the EIS states that well monitoring is required where dewatering of excavations takes place. At this stage of the CEMP, it is not possible to confirm whether dewatering will be required, as this is dependent on rainfall conditions and underlying groundwater levels at the time of construction. Once the identification of wells within the defined buffer areas has been confirmed, ESB proposes to undertake baseline water quality monitoring and monitor water levels at each well prior to commencement of construction works, in accordance with the European Union (Drinking Water) Regulations. Where dewatering occurs at tower locations, appropriate post-construction monitoring will also be undertaken. Results of water monitoring will be issued to the Local Authority.

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9	Although standard details of dust control have been provided such as the use of water bowsers, these details do not address specific issues at tower locations where access is severely restricted and requires stepping down of loads. Details of site specific arrangements for dust control at tower locations where access is severely restricted should be submitted.	Dust suppression equipment suitable for the 30 m × 30 m working area will be available during periods of dry weather and deployed as required on site. A range of appropriate dust control measures will be available, including:- Mobile water bowser units, which can be towed by 4×4 vehicles or vans or transported by trailer. These units typically are of a size to allow them to be parked within the working area and used as required.- IBC water containers fitted with spray hoses, which provide a compact and flexible dust suppression solution.- Tractor-mounted water bowsers, which may be used on site access tracks and, where necessary, on public roads.- Road sweepers, which may be deployed on access roads and public roads to remove deposited material and prevent the generation of dust nuisance.Section 4.6 *Air Quality & Dust Management* of th CEMP has been updated accordingly. In addition, reference is made to the *Constructability Repor*t in Appendix 6 of the CEMP.
10	It is considered that the details of liaison procedures to resolve any issues or community concerns is lacking in detail in respect of situations where agreement cannot be achieved with the landowner or addressed to the satisfaction of the community, as no details or mechanisms have been provided for dispute resolution. Details of specific mechanisms for dispute resolution should be submitted.	Section 3.1 of the CEMP *Stakeholder Management* and Section 5.1.1.2 on *Roles & Responsibilities* have been updated to reflect this matter. The main addition to this section is the following: - ESB, as Transmission Asset Owner (TAO), has responsibility for the construction of the project. Accordingly, ESB will appoint project-specific Construction Supervisor(s) with responsibility for supervising ESB-appointed contractors. - ESB Construction Supervisors will also be responsible for liaison with landowners and will maintain communication with affected landowners prior to, during, and following completion of construction works. Construction Supervisors will ensure that any landowner concerns or issues are identified, recorded, and addressed in a timely manner.

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11	It is noted that the CEMP relies on Whooper Swan Surveys conducted in the years from winter 2007 / 2008 to 2013 / 2014 inclusive. The planning authority has concerns that these surveys were carried out a considerable number of years ago and that the flight path and stopping areas of the swans to feed may have altered. Consequently, the planning authority has concerns regarding the appropriateness of relying upon these surveys. It is also noted that a protocol for pre-construction verification surveys is required to be agreed with the relevant planning authorities, following consultation with the National Parks and Wildlife Service and that in the event of these surveys identifying species of conservation interest, measures for their protection shall be incorporated into the construction environmental management plan. Consequently, up to date surveys and any adjusted mitigations should be submitted. Furthermore, reference is made to Section 4.7.2.2 on Ecological Management of Whooper Swans but no section 4.7.2.2 exists in the CEMP. Clarification is required in respect of this matter	Table 2.1 of the CEMP has been updated with the correct reference of Section 4.8.3.2 Whooper Swan (Cygnus cygnus). Consultation with the NPWS in relation to the Whooper Swan Protocol is currently underway. This protocol includes the provision of pre-construction monitoring in the form of Vantage Point Surveys and IWeBs surveys, which will be carried out on wetlands within the vicinity of the project route. These surveys along with consultation with NPWS will help to identify any new potential Whooper Swan flightpaths (in addition to the existing flightpaths), which will then be monitored throughout the pre-construction, construction and operational phases of the project. The Whooper Swan Monitoring Protocol is directly related to Condition 6 of the Planning Conditions. After consultations are completed details of this protocol will be issued to Monaghan County Council for discharge.
12	It is stated in Section 2.3.2.2 of the CEMP that a main badger sett was recorded approximately 100 metres north-east of tower 114, featuring at least 20 holes, a badger hole was noted 45 metres from proposed tower 13, and a badger sett recorded 35 m from tower 140 between November 2021 and February 2022. It is further stated that the respective areas will be further inspected prior to construction to verify ecological conditions and features. These inspections should be carried out and the details of same with any mitigations submitted.	Section 2.3.2.2, Table 2.4 contains findings from Ecology walkover surveys which occurred between November 2021 and February 2022. Further inspections will be carried out prior to construction to verify all ecology present onsite, including badger setts. Section 4.8.2.2 of the CEMP contains mitigation measures if badger setts are identified. Pre-confirmatory surveys will report on existing setts and any new setts within the vicinity of the towers. Details of all Pre confirmatory surveys have been issued and agreed with NPWS, in line with Condition 4. Condition 4 will be issued to Monaghan County Council, Cavan County Council and Meath County Council for discharge in due course. Section 3.2.1 of the CEMP states *It is vital that surveys are carried out close to the date of commencement of works. This will better inform mitigation measures as it will allow for more accurate depiction of current habitat conditions and mammal movements.* Surveys will be scheduled to occur in advance of construction works. All findings from surveys will be added to each Access Route Map, with specific mitigation added where relevant. In addition to this, as the CEMP is a live document, all survey results will be included and linked to relevant mitigation.

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13	It is stated in Section 3.2 that pre confirmatory surveys are to be agreed with the relevant planning authority and the pre-construction survey shall be completed three months prior to the commencement of the development. Sections 4.7.1 & 4.7.2 are referred to for further details, however, these sections relate to noise and vibration. Details of these surveys are required.	The section references are now updated in Section 3.2 of the CEMP. The correct references are *Section 4.8.2 Mammal Surveys* and *Section 4.8.3 Avian Surveys*. NPWS were consulted on the pre-verification survey protocol and received agreement of same in April 2026. The Condition 4 protocol will be issued to Monaghan County Council, Cavan County Council and Meath County Council for discharge.
14	There is insufficient detail on access to tower sites. It is stated within the CEMP that temporary access will be via existing routes and access points as far as possible. Details of these temporary accesses for each tower should be provided particularly in regard to determining construction traffic movements and suitability of proposed haul routes	Access routes, temporary access routes and traffic movements were included in the EIS, as part of the Environmental Impact Assessment: - Volume 3B Figures - *Key Constraints and Ancillary Works* - Volume 3C Figures - *Haul Rout*e Figures are included in Figure 13.09 - Figure 13.13 and in further information submitted on Alternative Haul Routes in Appendix 18.1 - Volume 3C Figures - Temporary access routes are included in Figure 13.14 - Figure 13.17 - Volume 3C Chapter 13 *Material Assets Traffic* Access Route Maps have been developed for all 109 tower structures in County Monaghan. See Appendix 3 of the CEMP. Traffic Route Maps have also been developed and are contained as appendices to the TMP.
15	There is insufficient detail on access to guarding locations. The information provided assumes that the guarding locations will typically be accessed by 4x4 vehicle and excavator through existing access routes. However, no information is provided where these accesses and guarding locations are at. Details of guarding locations and specific access routes are required.	Guarding locations and access to guarding locations were included in the EIS, as part of the Environmental Impact Assessment: - Volume 3B Figures - *Key Constraints and Ancillary Works* contains aerial imagery maps of the entire alignment showing key construction elements as well as constraints and ancillary works. - Access Route Maps have been developed for all 109 structures and included in the CEMP showing guarding locations and associated access routes, stringing locations and associated access routes, access entrance points, temporary access, towers etc. See Appendix 3 of the CEMP .
16	No details have been provided in relation to the various elements of surface water drainage system at the construction material storage yard such as the type and capacity of hydrocarbon interceptor and silt trap. In addition, it is noted that these elements are unacceptably located in the centre of the site. Additional details of these elements and a revised site layout indicating these elements located just before the swale / discharge point should be submitted. Furthermore, there are no details	Drawing No. 24051-MWP-ZZ-ZZ-DR-C-0112 showing site details is contained in Appendix 2 of the CEMP. This drawing shows details of the various elements of the surface water drainage system, for example, type and capacity of oil interceptor and silt trap.The oil interceptor has been relocated to the east of the site, located upstream of the settlement pond as shown in drawing 24051-MWP-ZZ-ZZ-DR-C-0102.Flow control device has been positioned between the settlement pond and

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	of how it is proposed to limit runoff from site to greenfield runoff rates and details of same should be submitted.	swale to limit runoff. Temporary storage for the attenuated flow will be provided for in the pond and in the pipe network.
17	It is noted that the CEMP makes reference to CEMP (Addendum 1) providing all relevant details on the construction and environmental management of the material storage yard. This Addendum 1 does not appear to have been submitted and should be submitted.	The structure of the CEMP, TMP & RWMP issued in July 2025 was originally based on the preparation of individual Addendums to accompany specific construction packages. In this context, the Addendum relating to the Material Storage Yard was submitted to Monaghan County Council (MCC) in August 2025. However, on foot of the matters raised by MCC in February 2026, the use of Addendums no longer applies. All queries raised by MCC have been addressed and the CEMP, TMP & RWMP have been updated accordingly.

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18	The CEMP states that concrete trucks shall be brought as close as possible to the excavation to pour directly into the excavation and pulling of the lines may be accomplished by attaching them to a specialised stringing vehicle, known as a puller-tensioner. However, no details have been provided for circumstances where access to tower locations is severely restricted / limited. Details of how it is proposed to transport concrete to the tower locations and how pulling of the lines may be accomplished where access to tower locations is severely restricted / limited should be submitted.	**Concrete** Concrete is typically delivered to site using 6 m^3 or 8 m^3 concrete trucks. Where temporary access arrangements do not permit delivery by trucks of this size, the concrete truck will travel as close as practicable to the site entrance. Concrete will then be transferred from the truck to a dumper vehicle, which will deliver the concrete to the foundation excavation via concrete hopper. Section 4.4 of the CEMP has been updated to reflect this. See also EIS Chapter 7 - *Construction* Section 7.3.4.2.2 which states '*Concrete trucks will be brought as close as possible to the excavation to pour directly into the excavation. In the event of this not being possible concrete will be transported in six tonne dumpers fitted with concrete chutes.*' This methodology was successfully demonstrated during a trial carried out by ESB to replicate the construction of North–South Interconnector (NSIC) towers. Further details of this trial are provided in Appendix 6 - *400 kV North–South Interconnector Constructability Report.* **Stringing** The stringing methodology, including the use of puller–tensioner equipment, is described in EIS Volume 3B, Chapter 7 - *Construction*, Section 7.3. The puller–tensioner equipment does not enter the 30 m × 30 m tower working area. This equipment is set up only at angle mast towers, at a short distance from the tower location, to allow conductors to be pulled and installed on the towers. Figure 7.12 in Chapter 7 of the Monaghan–Cavan Study Area (MCSA) illustrates a puller–tensioner machine, while Figure 7.15 demonstrates the typical separation distance between the equipment and the 30 m × 30 m tower working area. Puller–tensioner machines are typically transported to site by low loader and then towed into position using a tractor.
19	In section 3.7 it is stated that site development and building works will generally be carried out during normal working hours, but that in exceptional circumstances works may be required outside of these hours. Details of normal working hours and details of what constitutes exceptional circumstances and the working hours envisaged should be submitted.	Section 3.7 of the CEMP has been updated with the following text: *Site development and building works will generally be carried out during normal working hours - 07:00 to 18:00 Monday to Friday and 08:00 to 14:00 Saturdays. No site development works shall take place outside of these hours, or on Sundays or Public Holidays. Any alterations to these times shall be subject to the prior written agreement of the Planning Authority.*

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20	It is noted that the CEMP states that *all stockpiles will be temporarily stored at each construction site prior to removal by a licensed haulier.* It is further noted that reference is made elsewhere to utilisation of excavated soil and other material within the site. Details should be submitted in relation the amount of material being stored on site, the amount that will be taken off site for each tower location, and how it is proposed to do this at tower locations where access is severely restricted / limited.	Alternative construction methodologies will be employed at tower locations to minimise the formation of large stockpiles within the defined 30 m × 30 m working area. Under this approach, two tower leg foundations will be excavated and constructed initially, resulting in a temporary stockpile from two, rather than four, foundation excavations. Once the foundations for the first two tower legs are completed, the excavated material will be utilised to backfill excavations or remain within the working area. The remaining two tower leg foundations will then be excavated, and similarly reinstated upon completion of the remaining foundations. Where site investigations identify the need for removal of additional material from site, it will be transferred to a dumper truck and removed from site by a licensed waste haulier or transferred to Flexible Intermediate Bulk Container (FIBC or one tonne bags) and removed by van & trailer. These alternative construction methodologies have been demonstrated through a construction trial carried out in support of the North–South Interconnector project. Further details on the management of excavated materials and stockpiles are provided in Appendix 6 – *400 kV North–South Interconnector Constructability Report.* Section 4.1 *Earthworks Management* of the CEMP has been updated to clarify this approach in alternative foundation construction methodology.
21	It is stated in Section 4.3.2 that baseline water quality monitoring will be undertaken by the Ecological Clerk of Works prior to the commencement of construction to confirm baseline data. Details of these monitoring proposals should be submitted.	CEMP has been updated to include full details on the Surface Water Monitoring Protocol, including a list of watercourses that will be monitored and water monitoring locations. There are four watercourses in County Monaghan that will be within 50m of tower locations, these watercourses along with the Surface Water Monitoring Protocol are outlined in Section 4.3.2 and Table 4.1 of the updated CEMP. Monitoring locations are included in the Access Route Maps for Towers 105, 106, 124, 163 and 180.

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22	It is further stated in Section 4.3.2 that water quality monitoring will be targeted on watercourses considered to be at a higher risk of pollution (i.e. towers where there are watercourses within 20m of the construction works) and that these locations will be identified following further consultation with the Ecological Clerk of Works and local Inland Fisheries Ireland personnel. These locations should be identified and provided for and the finalised monitoring regime submitted.	CEMP has been updated to include full details on the Surface Water Monitoring Protocol, including a list of watercourses that will be monitored and water monitoring locations. There are four watercourses in County Monaghan that will be within 50m of tower locations, these watercourses along with the Surface Water Monitoring Protocol are outlined in Section 4.3.2 and Table 4.1 of the updated CEMP. Monitoring locations are included in the Access Route Maps for Towers 105, 106, 124, 163 and 180. Consultation with IFI in relation to the Surface Water Monitoring Protocol has commenced and the CEMP will be updated accordingly following any changes.
23	In Section 4.3.3 it is stated that any wells identified within 100 metres of the overhead line (OHL) will be noted. Details of all wells within 100 metres of the overhead line (OHL) should be provided.	Section 4.3.3 of the CEMP has been updated in response to this comment.A GIS exercise was carried out using the latest GSI data to identify wells in proximity of the works. As a precautionary measure, wells within 130m of tower locations and 110m of the OHL alignment were identified. Four wells were found to be within the buffer zones in County Monaghan - 2 wells at Tower 155, 1 at Tower 168 and 1 at Tower 178. The presence of these wells will have to be confirmed with landowners. In addition to this, ESB representatives will confirm with all landowners whether there is a well located in the vicinity of the sites, prior to construction commencing and Access Route Maps will be updated accordingly (Appendix 3 of the CEMP). Section 7.5 of the EIS states that well monitoring is required where dewatering of excavations takes place. At this stage of the CEMP, it is not possible to confirm whether dewatering will be required, as this is dependent on rainfall conditions and underlying groundwater levels at the time of construction. Once the identification of wells within the defined buffer areas has been confirmed, ESB proposes to undertake baseline water quality monitoring and monitor water levels at each well prior to commencement of construction works, in accordance with the European Union (Drinking Water) Regulations. Where dewatering occurs at tower locations, appropriate post-construction monitoring will also be undertaken. Results of water monitoring will be issued to the Local Authority.

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24	It is stated in Section 4.4 that all concrete will be brought on site by truck. Details of how it is proposed to do this particularly at tower locations where access is severely restricted / limited should be provided.	Concrete is typically delivered to site using 6 m^3 or 8 m^3 concrete trucks. Where temporary access arrangements do not permit delivery by trucks of this size, the concrete truck will travel as close as practicable to the site entrance. Concrete will then be transferred from the truck to a dumper vehicle, which will deliver the concrete to the foundation excavation via concrete hopper. Section 4.4 of the CEMP has been updated to reflect this. This methodology was demonstrated during a trial carried out by ESB to replicate the construction of North–South Interconnector (NSIC) towers. Further details of this trial are provided in Appendix 6 of the *400 kV North–South Interconnector Constructability Report.*
25	In Section 4.5 it is stated that the TMP Addendums will detail the above items for each work package, that the TMP Addendum for the material storage yard addresses each item, and that subsequent Addendums will in turn address all items for the overhead line tower construction. No Addendums appear to have been submitted. All addendums should be submitted.	The structure of the CEMP, TMP & RWMP issued in July 2025 was originally based on the preparation of individual Addendums to accompany specific construction packages. In this context, the Addendum relating to the Material Storage Yard was submitted to Monaghan County Council (MCC) in August 2025. However, on foot of the matters raised by MCC in February 2026, the use of Addendums no longer applies. All queries raised by MCC have been addressed and the CEMP, TMP & RWMP have been updated accordingly.
26	In relation to site traffic control measures it is stated within the CEMP that *parking on public roads is strictly prohibited*, and *traffic control measures will be implemented at all site locations once access agreements are finalised*. In addition to details of access agreements, details in respect of site traffic control measures are required.	Access Route Maps have been developed for all 109 structures and included in the CEMP showing guarding locations and associated access routes, stringing locations and associated access routes, access entrance points, temporary access, towers etc. See Appendix 3 of the CEMP. Section 4.5 of the CEMP and also Section 4.10 has been added to the TMP to expand on details in respect of site traffic control measures.
27	It is noted in Section 4.7 that *the use of mechanical tools, general construction activities, and the movement of vehicles servicing the sites has the potential to generate noise and vibration during the construction works but that no significant impacts are anticipated during construction activities.* Rationale is required to be provided for this assertion, particularly where towers are in close proximity to residential properties.	The rationale for this assertion comes from the EIS for the project. The conclusion of Chapter 9 on Air, Noise and Vibration states: *'An evaluation of the potential for noise and vibration impact to sensitive receptors from the proposed development has been carried out. It is predicted that the proposed development as designed, inclusive of the mitigation measures described in this evaluation, will not have a significant noise and vibration impact on sensitive receptors. '*

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28	It is stated in Section 4.8.3.2 of the CEMP that a suitable monitoring programme will be devised to be agreed with the relevant planning authority, and within 4.25 and 13.2 of the mitigation table in Appendix 4 it is stated that clearly defined monitoring programme will be implemented for Whooper Swans to assess the effectiveness of line marking. A suitable monitoring programme should be submitted. It is also stated in Section 4.8.3.2 that all locations where flightlines were identified will be surveyed during the preconstruction stage, construction and operation stages. It is further stated in Section 4.8.3.2 that confirmatory surveys will be conducted at all sites identified, monthly between October and April when Whooper Swans are present in the area, and that the monitoring methodology and regime will be clearly defined with details and included in the live CEMP and respective future Addendums for the overhead line route. Details of these pre-construction stage surveys/ confirmatory surveys have not been submitted and should be submitted.	The Whooper Swan Monitoring Protocol is directly related to Condition 6 of the Planning Conditions and consultation with the NPWS in relation to the Whooper Swan Protocol is currently underway and coming to a close. After consultations are completed details of this protocol will be issued to Monaghan County Council for discharge. This protocol includes the provision of pre-construction monitoring in the form of Vantage Point Surveys and IWeBs surveys, which will be carried out on wetlands within the vicinity of the project route. In addition to this, as the CEMP is a live document, all survey results will be included and linked to relevant mitigation.
29	In the Environmental Route Maps (Appendix 3 of CEMP) watercourses or other sensitive water features (e.g. but not limited to drains, rivers, lakes, karst features, drinking water sources) are required to be clearly shown on the Environmental Maps for each tower location. The CEMP is also required to clearly reference/outline additional measures required for the protection of watercourses or other sensitive water features if relevant. The details should be submitted.	Section 2.3.1 *Hydrology* has been updated - existing watercourse for all counties is included. Section 4.3.2 has also been updated to include details of water quality monitoring. Access Route Maps have been developed for all 109 tower structures in County Monaghan. Where watercourses are present in the vicinity of towers, water quality monitoring points have been added as well as relevant site specific mitigation measures. See Appendix 3 of the CEMP for Access Route Maps.
30	The proposed monitoring points in respect of watercourses or other sensitive water features for the duration of the works should be clearly marked on the Environmental Route Maps for each tower location.	Access Route Maps have been developed for all 109 tower structures in County Monaghan. Where watercourses are present in the vicinity of towers, water quality monitoring locations have been added as well as relevant site specific mitigation measures (silt traps etc). See Appendix 3 of the CEMP for Access Route Maps.

Traffic Management Plan (TMP)		
No.	**MCC Comments - Feb 2026**	**ESB Response - May 2026**
1	There is insufficient detail on access to tower sites. It is stated that temporary access will be via existing routes and access points as far as possible. Details of these temporary accesses for each tower should be provided particularly in regard to determining construction traffic movements and suitability of proposed haul routes	The following additional information is provided on temporary access routes and haul routes: - Access Route Maps have been developed for all 109 structures and included in the CEMP showing guarding locations and associated access routes, stringing locations and associated access routes, access entrance points, temporary access, towers etc. See Appendix 4 of the TMP. - Temporary Traffic Management Drawings illustrate an indicative routing plan along the local road network, with sequencing arrangements proposed to manage construction traffic. Drawings are included in Appendix 1 of the TMP. ESB will arrange a meeting with Monaghan County Council Municipal District Engineering Staff, with anticipation to meet over the coming weeks to discuss traffic related details.
2	There is insufficient detail on access to stringing locations. The information provided assumes it will be from the nearby proposed angle tower to the stringing location, where the two points are in the same field and there are no obstructions. However, no information is provided where the towers are in different fields or indeed different land ownership and in cases where there are obstructions. Details of proposals to string each of the towers are required, particularly where towers are in different fields and/or different land ownership and in cases where there are obstructions.	Access Route Maps showing stringing locations and access route to stringing locations have been created for all angle masts in County Monaghan, refer to Appendix 4 of the TMP. Additionally, the stringing methodology, including the use of puller–tensioner equipment, is described in EIS Volume 3B, Chapter 7 - Construction, Section 7.3. The puller–tensioner equipment does not enter the 30 m × 30 m tower working area. This equipment is set up only at angle mast towers, at a short distance from the tower location, to allow conductors to be pulled and installed on the towers. Figure 7.12 in Chapter 7 of the Monaghan–Cavan Study Area (MCSA) illustrates a puller–tensioner machine, while Figure 7.15 demonstrates the typical separation distance between the equipment and the 30 m × 30 m tower working area. Puller–tensioner machines are typically transported to site by low loader and then towed into position using a tractor.

Traffic Management Plan (TMP)		
No.	**MCC Comments - Feb 2026**	**ESB Response - May 2026**
3	There is insufficient detail on access to guarding locations. The information provided assumes that the guarding locations will typically be accessed by 4x4 vehicle and excavator through existing access routes. However, no information is provided where these accesses and guarding locations are at. Details of guarding locations and access to these guarding locations is required.	Guarding locations and access to guarding locations were included in the EIS, as part of the Environmental Impact Assessment: - Volume 3B Figures - *Key Constraints and Ancillary Works* contains aerial imagery maps of the entire alignment showing key construction elements as well as constraints and ancillary works. - Access Route Maps have been developed for all 109 structures and included in the CEMP showing guarding locations and associated access routes, stringing locations and associated access routes, access entrance points, temporary access, towers etc. See Appendix 4 of the TMP.
4	In Section 3.2.2 of the TMP it is stated that a step-down arrangement will be put in place where access points become a limiting point relative to vehicles widths and the most basic of equipment similar to standard agricultural vehicles currently accessing such locations will be utilised. No details of the specific towers where this will be required have been provided, and no measures have been provided in relation to how it is proposed to achieve this at locations where the stepping down of loads, etc will take place. These details are required.	The intention for the NSIC is for plant and materials to be transported to tower sites from the storage yard using the required vehicle to access the relevant tower site. In this way, transferring of materials or plant from one transport type to another will be removed. Refer to the North South Interconnector Constructability Report contained in Appendix 5 of the TMP for the estimated construction type at each tower location in Monaghan. Section 3.2.2 and Section 3.2.3 have been updated to reflect this.
5	It is stated in Section 4.1 that a detailed set of preliminary access maps were prepared and submitted as part of the planning application for the proposed development and reference is made to EIS Volume 3B Figures 1 to 34. However, as these were refined during the An Bord Pleanála hearing in respect of the project the refined proposals should be included within the TMP.	Access Route Maps have been created for all tower sites in County Monaghan, refer to Appendix 4 of the TMP. The access routes included in these maps include alterations which arose during the hearing.

Traffic Management Plan (TMP)		
No.	**MCC Comments - Feb 2026**	**ESB Response - May 2026**
6	It is stated that Appendix 1 of the TMP provides examples of Environmental Route Maps for intermediate and angle mast foundation structures along the overhead line route, that these maps will be completed for each tower location showing finalised access routes and all civil and environmental measures that need to be implemented prior to work commencing, and that further details on access routes maps for the overhead line development will be provided in future addendums to tower work packages. The provision of examples of accesses is insufficient. Details for the tower locations showing finalised access routes and all civil and environmental measures that need to be implemented prior to work commencing are required.	Access Route Maps have been developed for all 109 structures and included in the CEMP showing guarding locations and associated access routes, stringing locations and associated access routes, access entrance points, temporary access, towers etc. See Appendix 4 of the TMP.
7	It is stated in the TMP that *a safe system of traffic management will be utilised, including the use of Traffic Management Operatives (TMOs) where required, for the control of traffic during access/egress operation at the site access location during peak activities*. Further details are required.	Section 4.10 of the TMP has been updated, detailing the use of TMO's under Site Traffic Control Measures. Temporary Traffic Management drawings including proposing TMO locations have been created for County Monaghan tower locations and are located in the Appendix 1 of the TMP.
8	In Section 4.2 it is stated that the contractor(s) shall provide advanced warning signs, on the approach to proposed site access locations a minimum of one week prior to construction works commencing at the site. It is considered that two weeks would be a more appropriate period and a revised TMP should be submitted stating same	Section 4.2 of the TMP has been updated to note two-week period.
9	It is stated in the TMP that *a series of sequenced plans have been devised to service each of the tower sites with associated traffic signage*. These details should be submitted.	Section 4.2 and Section 4.3 have been expanded on in the TMP and link directly to the Temporary Traffic Management Drawings in Appendix 1 of the TMP. Temporary Traffic Management Drawings illustrate an indicative routing plan along the local road network, with sequencing arrangements proposed to manage construction traffic.

Traffic Management Plan (TMP)		
No.	**MCC Comments - Feb 2026**	**ESB Response - May 2026**
		ESB will arrange a meeting with Monaghan County Council Municipal District Engineering Staff, with anticipation to meet over the coming weeks to discuss construction traffic and sequencing.
10	It is stated in the TMP that Temporary Signage Drawings for all access routes for each site will be included in all TMP addendums for that specific work package. These details should be submitted.	TMP Addendums no longer apply. Temporary Traffic Management drawings have been created for County Monaghan tower locations and are located in Appendix 1 of the TMP. ESB will arrange a meeting with Monaghan County Council Municipal District Engineering Staff, with anticipation to meet over the coming weeks to discuss construction traffic and sequencing. Additional consultation with the appointed contractor will be required prior to works commencing onsite.
11	In Section 4.3 it is stated that a series of sequencing arrangements will be developed primarily demonstrating a routing plan along the local road network and that *the plan will be developed in sequences such that where works are progressing under for example sequence 1, sequence 2 shall not progress in tandem, where this could delay and affect the local detour arrangements, to ensure that combined construction and local traffic movements are not adversely affected*. Reference is also made to TMP addendums having more specific information on traffic routes. These addendums should be submitted.	Section 4.2 and Section 4.3 have been expanded on in the TMP and link directly to the Temporary Traffic Management Drawings in Appendix 1 of the TMP. Temporary Traffic Management Drawings illustrate an indicative routing plan along the local road network, with sequencing arrangements proposed to manage construction traffic. ESB will arrange a meeting with Monaghan County Council Municipal District Engineering Staff, with anticipation to meet over the coming weeks to discuss construction traffic and sequencing.
12	It is stated in Section 4.4 that a construction phase programme of works shall be developed in liaison with the relevant local authorities, taking into account potential road repair works that are included in the local authorities' road works schedule. These details should be submitted.	A meeting will be arranged with Monaghan County Council Municipal District engineering staff in the coming weeks. Items to be discussed with the Area Engineers will include road closures, road maintenance and repairs. Proposed routing plans and access routes will also be discussed. The live Traffic Management Plan (TMP) will be updated to incorporate any additional details or traffic-related mitigation measures arising from these discussions.

Traffic Management Plan (TMP)		
No.	**MCC Comments - Feb 2026**	**ESB Response - May 2026**
13	It is stated in the TMP that construction activities will be undertaken during normal working hours for all construction stages and that it is not anticipated that construction works will be carried out on Sunday, or Bank Holidays or that any construction works will be carried out in hours of darkness. Details of these working hours, particularly having regard to limited daylight hours in winter months, should be submitted.	Section 4.12 has been updated with the following: *Site development and building works will generally be carried out during normal working hours - 07:00 to 18:00 Monday to Friday and 08:00 to 14:00 Saturdays. No site development works shall take place outside of these hours, or on Sundays or Public Holidays. Any alterations to these times shall be subject to the prior written agreement of the Planning Authority.*
14	In Section 4.7 it is stated that wheel washing will be utilised where required, and any other necessary measures to remove mud and organic material from vehicles exiting tower sites. Clarification on how this is going to be achieved particularly at tower locations where access is severely restricted / limited should be submitted.	Mobile water bowser units, which can be towed by 4×4 vehicles or vans or transported by trailer. These units are typically of a size allowing them to be parked within the working area and used as required. IBC water containers fitted with spray hoses may also be used, which provide a compact and flexible solution. Tractor-mounted water bowsers, which may be used on site access tracks and, where necessary, on public roads. Section 4.7 of the TMP has been updated to include this information.
15	It is stated in Section 4.8 that pre-condition surveys of public roads will be carried out at all sites prior to construction commencing and post condition surveys will be carried out on completion of works. Details of these surveys should be submitted for agreement with Monaghan County Council Municipal District Engineering staff.	Section 4.8 of the TMP has been updated. ESB will arrange a meeting with Monaghan County Council Municipal District Engineering Staff, with anticipation to meet over the coming weeks to discuss the arrangements of pre and post construction road surveys.
16	In Section 4.9 it is stated that further site-specific details for short term road closures will be included in TMP addendums for each overhead line work package. These addendums should be submitted.	TMP Addendums no longer apply. A meeting will be arranged with Monaghan County Council Municipal District engineering staff in the coming weeks. Items to be discussed with the Area Engineers will include road closures, road maintenance and repairs. Proposed routing plans and access routes will also be discussed. The live Traffic Management Plan (TMP) will be updated to incorporate any additional details or traffic-related mitigation measures arising from these discussions.

Traffic Management Plan (TMP)		
No.	**MCC Comments - Feb 2026**	**ESB Response - May 2026**
17	It is stated in Section 4.10 that monitoring measures will be implemented to confirm the effectiveness of the TMP and compliance by all contractor staff and material suppliers. Details of these monitoring measures should be submitted.	Section 4.11 (previously 4.10) of the TMP has been updated. Details include the responsibilities of ESB and Contractors in their roles in the implementation and monitoring of the TMP. - ESB, as Transmission Asset Owner (TAO), has responsibility for the construction of the project. Accordingly, ESB will appoint project-specific Construction Supervisor(s) with responsibility for supervising ESB-appointed contractors. - ESB Construction Supervisors will also be responsible for liaison with appointed Contractor(s) and landowners and will maintain communication with affected landowners prior to, during, and following completion of construction works. Construction Supervisors, together with the appointed Contractor's Supervisor(s), will ensure that Traffic Mitigation Measures are being implemented. The effectiveness of the TMP will be demonstrated through regular audits and inspections by the Construction Supervisor and adherence to agreed mitigation measures (routing, signage, speed controls, and programming) will ensure compliance. Pre- and post-road condition surveys will provide measurable evidence that the TMP has minimised disruption and maintained road safety. The TMP will operate as a live document, allowing for continuous improvement where monitoring identifies the need for corrective actions.

Traffic Management Plan (TMP)		
No.	**MCC Comments - Feb 2026**	**ESB Response - May 2026**
18	In Section 4.12 it is stated that unobstructed access will be provided to all emergency vehicles along all routes and site accesses. Details on how this is going to be achieved particularly at tower locations where access is severely restricted / limited is required.	Unobstructed access for emergency vehicles will be safeguarded through the implementation of the TMP which includes provisions for traffic control, temporary road closures and the use of TMO's - all of which will be coordinated with Monaghan County Council to ensure that roads remain passable or can be rapidly cleared if required. The use of stepping-down of vehicles and confinement of HGV's to suitable roads further reduces the likelihood of blockage on narrow routes. Advance planning, liaison with local authorities and affected landowners and controlled access arrangements at each work location will ensure that emergency services can maintain access at all times. Temporary Traffic Management Drawings illustrate an indicative routing plan along the local road network, with sequencing arrangements proposed to manage construction traffic. Drawings are included in Appendix 1 of the TMP. Section 4.13 (previously 4.12) has been updated with this text and Section 4.10 has been added on Site Traffic Control Measures
19	Although details of dust control have been provided including use of a water bowser, these details do not address specific issues at tower locations where access is severely restricted and requires stepping down of loads. Details of site specific arrangements for dust control at tower locations where access is severely restricted should be submitted.	Dust suppression equipment suitable for the 30 m × 30 m working area will be available during periods of dry weather and deployed as required on site. A range of appropriate dust control measures will be available, including: - Mobile water bowser units, which can be towed by 4×4 vehicles or vans or transported by trailer. These units typically are of a size to allow them to be parked within the working area and used as required. - IBC water containers fitted with spray hoses, which provide a compact and flexible dust suppression solution. - Tractor-mounted water bowsers, which may be used on site access tracks and, where necessary, on public roads. - Road sweepers, which may be deployed on access roads and public roads to remove deposited material and prevent the generation of dust nuisance. Section 4.6 Air Quality & Dust Management of the CEMP has been updated accordingly. In addition, reference is made to the Constructability Report in Appendix 5 of the TMP.

Traffic Management Plan (TMP)		
No.	**MCC Comments - Feb 2026**	**ESB Response - May 2026**
20	In respect of the details of site specific arrangements for each temporary access route, it is noted that only two examples have been provided for four tower locations (Towers 111, 112, 113 and 144) out of 109 towers and that these examples lack site specific details in respect of stepping down vehicle size, offloading of materials, short term road closures, the phasing of construction works, transfer and management of concrete, including wash out facilities, particularly where public road widths are severely restricted. It is also noted in one of the examples provided that the indicated existing access opening onto the public road for tower 144 does not appear to exist. Details of site specific arrangements for each temporary access route, to include, where necessary, arrangements for stepping down vehicle size, arrangements for off-loading of materials, short term road closures, the phasing of construction works which are accessed by single lane carriageways, and the arrangements for the transfer and management of concrete, including wash out facilities should be submitted.	Access Route Maps and Temporary Traffic Management drawings have been created for County Monaghan tower locations. The Access Route Maps are included in Appendix 4 of the TMP while the Temporary Traffic Management drawings are located in Appendix 1 of the TMP. Additional commentary relating to construction methodologies, tower site layouts, concrete wash out, and transport of plant and material to tower sites is provided in the Constructability Report in Appendix 5 of the TMP. Access Map 144 has been updated to reflect the proposed access location. This is indicated by the orange dot on the map, refer to Appendix 4 of the TMP, drawing reference PE687-D422-042-022.

Resource Waste Management Plan (RWMP)		
No.	**MCC Comments - Feb 2026**	**ESB Response - May 2026**
1	Reference is made to the Monaghan County Development Plan 2019-2025. This should be the Monaghan County Development Plan 2025-2031	Section 2.7 of the RWMP has been updated to the Monaghan County Development Plan 2025 - 2031.
2	It is noted in Section 1.1 that it is stated that all addendums will be submitted to the relevant local authority for agreement prior to the commencement of work packages. These addendums should be submitted.	The structure of the CEMP, TMP & RWMP issued in July 2025 was originally based on the preparation of individual Addendums to accompany specific construction packages. In this context, the Addendum relating to the Material Storage Yard was submitted to Monaghan County Council (MCC) in August 2025. However, on foot of the matters raised by MCC in February 2026, the use of Addendums no longer applies. All queries raised by MCC have been addressed and the CEMP, TMP & RWMP have been updated accordingly.
3	In relation to the Material Storage Yard an Article 11 request must be submitted to the EPA in relation to storage of waste at this development in order to determine if further consent is needed. The RWMP should be updated accordingly upon determination of the Article 11 by the EPA and submitted.	An Article 11 determination is not required, as all waste will be generated and temporarily stored at the site, and no Third or Fourth Schedule activities (as defined in the Waste Management Act 1996) will be undertaken on-site. Waste generated at the site is limited to low volumes of non-hazardous waste i.e. C&D waste, office & canteen waste and packaging of materials. All waste will be segregated and stored temporarily on site prior to collection for off-site disposal by an authorised waste contractor. For clarity, waste streams arising from overhead line (OHL) tower construction locations will not be transported to the Material Storage Yard (MSY) for storage or collection. The MSY will not function as a waste management or consolidation hub from any waste arising from OHL tower sites. The MSY will be used solely for the storage of overhead line (OHL) tower equipment and associated materials. Only waste generated directly from activities carried out within the MSY will be managed at the MSY site. Section 6 of the RWMP has been updated to reflect this information.

Resource Waste Management Plan (RWMP)		
No.	**MCC Comments - Feb 2026**	**ESB Response - May 2026**
4	It is stated in Section 5.1 that any residual mixed construction and demolition waste (including excavated soils not to be reused on site) will be collected in containers or skips specifically for mixed construction and demolition waste and removed offsite for subsequent offsite separation and recycled at a waste disposal / recovery facility in accordance with all relevant waste management legislation. Details on how this is going to be achieved at tower locations where access is severely restricted / limited should be submitted.	The volume of mixed construction and demolition (C&D) waste anticipated at each tower location is low and non-hazardous. The intended approach for managing all waste streams within the defined 30 m × 30 m working area is to utilise segregated containers or skips to store C&D waste during the construction works. Upon completion of tower construction, one of the following options will apply: - Where waste exceeds 2 tonnes, the C&D waste containers or skips will be removed off-site by a licensed waste contractor; or - Where waste is less than 2 tonnes, the C&D waste will be removed by the contractor directly to a licensed waste facility (as per Article 30 (1) (b) of the Waste Collection Permit Regulations 2007 (as amended). The receptacles used to temporarily hold waste in the 30m x 30m working areas and then used to remove the waste from the site will be appropriately sized small enough to allow ease of removal, especially in cases where access is restricted or limited. Section 5.1 of the RWMP has been updated to reflect this information. Further details on waste management within the 30 m × 30 m working area are provided in Appendix 2 of the RWMP – *400 kV North–South Interconnector Constructability Report*.
5	In Sections 5.1.1, 5.1.2 and 5.1.3 it is stated that excavated soils and bedrock not to be reused on site shall be removed from site by a licensed haulier and transported to a suitable licensed waste disposal facility or waste transfer station. Details on how this is going to be achieved at tower locations where access is severely restricted / limited should be submitted.	It is anticipated that, in most cases, excavated soil will be suitable for reinstatement around the base of the tower foundations. Where site investigations identify that additional material must be excavated and a residual quantity of material remains that cannot be reinstated on site, this material will be removed off-site by a suitably licensed waste haulier. This material will be transported off-site: - The material is transferred to a dumper truck and removed from site or - The material is transferred to Flexible Intermediate Bulk Container (FIBC or one tonne bags) and removed by van & trailer.

Resource Waste Management Plan (RWMP)		
No.	**MCC Comments - Feb 2026**	**ESB Response - May 2026**
6	In Section 5.1.2 there is reference to the use of subsoil waste subject to landowner agreement. As subsoil can only be used on the site where it was produced, details on how this is going to be achieved should be submitted.	Section 5.1.2 of the RWMP has been updated. Excess subsoil that cannot be reinstated onsite will be recovered/disposed off-site by a licenced waste haulier.
7	It is stated in Section 5.1.4 that concrete waste shall be removed from site by a licensed haulier and transported to a suitable licensed waste disposal facility or waste transfer station. Details on how this is going to be achieved at tower locations where access is severely restricted / limited should be submitted.	The volume of concrete waste anticipated at each tower location is low and non-hazardous. The intended approach for managing all waste streams within the defined 30 m × 30 m working area is to utilise segregated containers or skips to store concrete waste during the construction works. Concrete waste is considered a type of C&D waste. Upon completion of tower construction, one of the following options will apply: - Where waste exceeds 2 tonnes, the concrete waste containers or skips will be removed off-site by a licensed waste contractor or - Where waste is less than 2 tonnes, the concrete waste will be removed by the contractor directly to a licensed waste facility (as per Article 30 (1) (b) of the Waste Collection Permit Regulations 2007 (as amended). The receptacles used to temporarily hold waste in the 30m x 30m working areas and then used to remove the waste from the site will be appropriately sized small enough to allow ease of removal, especially in cases where access is restricted or limited Further details on waste management within the 30 m × 30 m working area are provided in Appendix 2 of the RWMP– *400 kV North–South Interconnector Constructability Report*.
8	In Sections 5.1.5, 5.1.6 and 5.1.7 it is stated that metal, plastic and cardboard waste generated on site shall be removed from site by a licensed haulier and transported to a suitable licensed waste disposal facility. Details on how this is going to be achieved at tower locations where access is severely restricted / limited should be submitted.	The volume of metal, plastic and cardboard waste anticipated at each tower location is low. The intended approach for managing all waste streams within the defined 30 m × 30 m working area is to utilise a small number of containers or skips to store waste during the construction works. Upon completion of tower construction, one of the following options will apply: - The waste container or skip will be removed off-site by a licensed waste contractor or - Where waste is less than 2 tonnes, the concrete waste will be removed by the contractor directly to a licensed waste facility (as per Article 30 (1) (b) of the Waste

Resource Waste Management Plan (RWMP)		
No.	**MCC Comments - Feb 2026**	**ESB Response - May 2026**
		Collection Permit Regulations 2007 (as amended). The receptacle used to temporarily hold waste in the 30m x 30m working areas and then used to remove the waste from the site will be appropriately sized small enough to allow ease of removal, especially in cases where access is restricted or limited Further details on waste management within the 30 m × 30 m working area are provided in Appendix 2 of the RWMP – *400 kV North–South Interconnector Constructability Report*.
9	It is stated in Sections 5.1.8 that timber waste such as cleared vegetation and timber conductor drums shall be removed from site by a licensed haulier and transported to a suitable licensed waste disposal facility. Details on how this is going to be achieved at tower locations where access is severely restricted / limited should be submitted.	The volume of timber waste anticipated at each tower location is low. The intended approach for managing all waste streams within the defined 30 m × 30 m working area is to utilise a small number of containers or skips to store waste during the construction works. Upon completion of tower construction, one of the following options will apply: - The waste container or skip will be removed off-site by a licensed waste contractor Or - Where waste is less than 2 tonnes, the concrete waste will be removed by the contractor directly to a licensed waste facility (as per Article 30 (1) (b) of the Waste Collection Permit Regulations 2007 (as amended). The receptacle used to temporarily hold waste in the 30m x 30m working areas and then used to remove the waste from the site will be appropriately sized small enough to allow ease of removal, especially in cases where access is restricted or limitedFurther details on waste management within the 30 m × 30 m working area are provided in Appendix 2 of the RWMP – *400 kV North–South Interconnector Constructability Report*.

Resource Waste Management Plan (RWMP)		
No.	**MCC Comments - Feb 2026**	**ESB Response - May 2026**
10	It is noted in Section 5.2.1 that no servicing or refuelling of vehicles will be carried out within 50 metres of water courses or 20 metres of a drainage ditch. Details on how this will be complied with where tower locations are located within 50 metres of a water course and/or 20 metres of a drainage ditch should be submitted.	Where towers are located within 50 m of watercourses or within 20 m of a drainage ditch, servicing or refuelling of vehicles will not take place. Vehicles will be subject to regular inspection to ensure they are maintained in good working order and all refuelling will be undertaken off-site prior to vehicles arriving at the tower locations. There are five tower locations within 50 m of watercourse - these can be seen on Access Route Maps (Appendix 3 of the CEMP) for Towers 105, 106, 124, 163 and 180 stating that '*No Servicing or Refuelling of vehicles*' will be carried out.
11	It is stated in Section 5.2.3 that temporary facilities will be provided for construction works at tower locations and there will be regular collection by a licensed company for discharge to the nearest local authority sewage treatment plant. Details on how this is going to be achieved at tower locations where access is severely restricted / limited should be submitted.	It is intended to use a mobile welfare unit - typically a van with kitchen and use port-a-loo cabins for toilet facilities. This approach was demonstrated during a trial carried out by ESB to replicate the construction of North–South Interconnector (NSIC) towers. Further details of this trial are provided in Appendix 2 of the TMP - *400 kV North–South Interconnector Constructability Report*.