Comhairle Contae Mhuineacháin
Monaghan County Council

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22nd October 2026

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A Chara,

Re: Compliance with Condition 3 of the order issued by An Bord Pleanala under Reference 02.VA0017
Development: North South 400kV Electricity Interconnector

I refer to the information and details submitted to the Planning Authority on 15th May 2026 regarding compliance with condition 3 of the above.

Monaghan County Council has reviewed the roads-related elements of the Construction Environmental Management Plan (CEMP) and Traffic Management Plan (TMP) and considers that insufficient information has been provided to enable the planning authority to agree to the discharge of Condition 3 at this juncture. A further written response regarding compliance with the environmental matters (water protection and waste management) and any other matters to be addressed under condition 3 will issue separately.

Having regard to the above, this correspondence formally outlines the principal matters identified during the review which the planning authority requires further information / clarification on.

The current submission does not provide sufficient site-specific detail to enable a comprehensive assessment of compliance with Condition 3 and associated roads-related requirements. In particular, the submission does not adequately demonstrate the proposed site-specific arrangements for each temporary access route, where necessary, for:

a) Stepping down vehicle size.
b) Off-loading of materials, including concrete.
c) Traffic management measures and road closures.
d) Construction phasing on single-lane carriageways.

e) Pre and post construction road condition surveys.
f) Liaison and community engagement procedures.

Site Visits

During the Planning Compliance Meeting held on 7 October 2026 between representatives of Meath County Council, Monaghan County Council, Cavan County Council and ESB, ESB confirmed that the CEMP and TMP were primarily prepared using desktop information and that site visits had not been undertaken at all proposed access locations prior to preparation of the current submission. Detailed site inspections of all temporary access routes should be carried out to inform a revised compliance submission.

Step Down / Offloading / Concrete Delivery – Condition 3(c)(i/ii/v)

Monaghan County Council notes that several proposed access locations shown on the submitted drawings do not reflect existing access arrangements from the public road on the ground. A revised submission should therefore include site-specific proposals for every temporary access route together with supporting documentation, demonstrating arrangements for stepping down vehicle size, arrangements for off-loading of materials and arrangements for the transfer and management of concrete. Details for all temporary access routes related to tower, guarding and stringing locations, is required to be addressed in a revised CEMP and TMP and specifically how these temporary access routes affect the adjacent public road network for each site.

TTM / Road Closures – Condition 3(c)(iii)

In relation to traffic management, there are significant concerns regarding the extent of the proposed one-way systems, the potential impact on the wider road network, the proposed stepping-down methodology and the off-loading of materials from public roads. Monaghan County Council considers that more localised road closures and diversion arrangements may be a more appropriate approach. Accordingly, ESB is required to review and revise the TMP accordingly. A revised submission shall include details of all temporary road closures and associated traffic management arrangements for each temporary access route.

For temporary access routes where traffic management measures are not proposed, adequate visibility splays and vehicle tracking analysis shall be provided to demonstrate safe access for the proposed construction vehicles. A revised CEMP and TMP shall also include construction vehicle numbers to enable a full assessment of the traffic management proposals.

It is noted that the current TMP omits traffic management details for several sections of the NSI development. The revised TMP shall clearly identify all locations where works interact with all public roads including local, regional and national routes, provide details of temporary traffic management measures, diversion routes and any proposed road closures for all tower, guarding and stringing locations.

Phasing of Construction Works – Condition 3(c)(iv)

It is noted that Table 1.1 within the CEMP provides a preliminary construction programme. This table provides no details on the timeframe or phasing of the development, but provides a list of phase types, activities, descriptions and methodology. Similarly, Section 4.3 of the TMP provides details on Routing of Construction Traffic, but provides no timeframe related to the associated activities. Condition 3(c)(iv) requires details on the phasing of construction works which are accessed by single lane carriageways. The current submission fails to address the requirements of condition 3(c)(iv). A revised compliance submission shall include details of the phasing and timeframe of construction works which are accessed by single lane carriageways.

Pre and Post Surveys – Condition 3(d)

For the purposes of Condition 3(d), Monaghan County Council requires the CEMP to include specific details of the proposed pre-construction and post-construction road condition survey methodology and the extent of all roads to be surveyed to be shown on associated maps. The extents of the routes to be surveyed must include all proposed haul routes and associated roads within the extent of the proposed traffic management plan. These details, including survey methodology and mapped survey routes shall be provided to the Planning Authority for review and agreement.

Liaison Procedures – Condition 3(d)

The CEMP states that liaison will take place but provides limited detail on how community concerns will be managed, investigated, escalated and resolved in practice. For the purposes of Condition 3(h), Monaghan County Council considers that additional details are required regarding liaison procedures to resolve any issues or community concerns, including the mechanisms that will be used to receive, investigate, escalate and resolve complaints and development-related concerns. These details shall be provided to the Planning Authority for review and agreement.

General Comments

The compliance submission received on 15th May 2025 also contains several references indicating that key elements of the CEMP and TMP would be agreed with Local Authority Roads Departments during construction. Monaghan County Council considers that this approach is inconsistent with the requirements of the planning conditions, which require the relevant details to be submitted, reviewed and agreed in advance of commencement of works.

Section 4.5 of the TMP titled "Recommended Traffic Management Speed Limits" states "Speed limit restricted of 30km/hr in sensitive locations on public roads." This sentence appears incomplete and therefore the proposal is not clear. Full details shall be provided to the Planning Authority for review and agreement.

The submitted CEMP and TMP require extensive cross-referencing between each other and previous submissions provided during the planning process to establish the site-specific proposals and associated impacts. Monaghan County Council requests revised standalone documents incorporating all relevant details to facilitate a clear assessment of the proposed temporary access routes.

The CEMP and TMP do not explicitly identify the appointed Project Supervisor for the Design Process (PSDP) or Project Supervisor for the Construction Stage (PSCS) governed by the Safety, Health and Welfare at Work (Construction) Regulations 2013 (S.I. No. 291/2013). While both documents identify various project management and construction supervision roles, including ESB Construction Supervisors, they do not confirm that these personnel fulfil the statutory PSDP or PSCS roles or provide details of the relevant appointments. Monaghan County Council requires details of these appointments and how they will be coordinated across multiple teams and contractors over the duration of the development.

Condition 8 - Surveys

During the Planning Compliance Meeting held on 7 October 2026, Condition 8, which relates to the protection of road surfaces, culverts, watercourses, verges and public lands during construction, was raised. To date, Monaghan County Council has received no details from ESB in relation to compliance with, or discharge of, this condition. Given that some aspects of this condition overlap with condition 3(d), Monaghan County Council requires that the revised CEMP and TMP address the requirements of Condition 8.

Conclusion

Having regard to the information required to demonstrate compliance with Condition 3, the Planning Authority considers that the information submitted to date is insufficient to enable the discharge of the condition. Accordingly, the condition cannot be discharged at this time.

Consequently, Monaghan County Council requests the submission of a revised CEMP and TMP, together with accompanying supporting documentation addressing the matters outlined above and incorporating site-specific information for all temporary access routes and associated construction activities in accordance with the requirements of the planning condition.

Mise le meas,

T. Gourley

Toirleach Gourley
Senior Executive Planner