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FAO Kieran Doherty,
Executive Officer,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1.

PL 11.VA0015

15th August 2013

Re: Laois Kilkenny Reinforcement Project

Dear Kieran,

I refer to correspondence received from An Bord Pleanála dated 29th April and 27th June 2013 in relation to the application in respect of the Laois – Kilkenny Reinforcement Project.

In the letter dated 29th April 2013 the Board requested EirGrid to furnish an Environmental Impact Statement (EIS) for the proposed development within 12 weeks of date of the letter (i.e. no later than 5.30pm on 22nd July 2013).

In the subsequent letter dated 27th June 2013, the Board provided clarifications in relation to this request as follows:

- Following a request from EirGrid, the Board permitted an extension to the time period for submitting the EIS to the Board, and advised that it should be received no later than 30th August 2013.
- The number of copies of the EIS to be submitted is as follows:
 - 3 hard copies and 7 electronic copies to the Board.
 - 5 hard copies and 2 electronic copies to each of the planning authorities.

It is noted from the Board's correspondence, dated 29th April 2013, that following submission of the EIS, the Board will advise of any further actions, including the publication of public notices and amendments to the website.

Notwithstanding the Board's request for submission of an EIS, and its stated reason for same as per its letter dated 29th April 2013, the Board will note that the general scope and content of this EIS was previously submitted with the original application to An Bord Pleanála, in January 2013. In particular, this was contained in the Planning Report (Volume 2) and Environmental Report (ER – Volume 3) of the application submission. Whilst there have been amendments to the text within each chapter of the EIS now being submitted, having regard to the provisions of Schedule 6 of the

Planning and Development Regulations 2001 (as amended), the content and structure of the EIS is broadly consistent with that of the previously submitted Planning Report and ER.

In this regard, some topics originally contained in the Planning Report submitted with the application – for example Project Need and Consideration of Alternatives – have now been re-located into the EIS. However, their general content has not altered to any material extent from that originally contained in the application submission.

The preparation of the EIS has followed a period of structured engagement with the public and other stakeholders, whereby EirGrid invited input into the content and structure of the EIS (also known as "Scoping"). This process is set out in Chapter 3 of the EIS.

As recorded in Chapter 3 of the EIS, the public invitation to participate in informing the scope and content of the EIS was primarily by way of public newspaper notice; in addition, EirGrid and its consultants wrote to a number of Statutory and non-Statutory consultees seeking their input in this regard. This has proved to be a useful means of obtaining input, and reflects current best practice in the preparation of Environmental Impact Statements.

The Board will be aware that its request for submission of an EIS follows receipt of a number of third party submissions in respect of the original application submission, received during the Statutory seven-week period advertised for the making of such submissions. Such submissions were received both from designated Prescribed Bodies, including both Laois and Kilkenny County Councils, environmental agencies, and the general public. It was considered prudent and appropriate to review the content of these submissions in the context of the process of scoping the EIS, to identify topics which should be addressed therein.

Two topics in particular have been identified from a review of the third party submissions to An Bord Pleanála which are now addressed in the EIS; these are the existing aquifer in the vicinity of the proposed substation, which is now addressed in the Water Section (Chapter 10) of the EIS, and agricultural land use, now addressed in the Material Assets Section (Chapter 11) of the EIS. Other environmental topics previously addressed in the Environmental Report submitted with the original application have been reviewed and/or updated to take account of issues raised in these public submissions. This has resulted, in EirGrid's consideration, in an extremely robust EIS now being submitted to An Bord Pleanála.

There are other issues raised in a number of the third party submissions which are not actually environmental matters, and therefore which do not belong within the EIS. Of particular note is the issue of alleged property devaluation arising from the proposed development. Whilst a stated matter of concern to some third parties, EirGrid has had regard to the provisions of the EPA *Advice Notes on Current Practice (in the preparation of Environmental Impact Statements) 2003*, wherein it is clearly stated in respect of *Common Problems* (Section 5) that the topic of *Human Beings* can "rapidly expand to include many topics (such as property prices, employment creation or commercial competition) outside the scope of an Environmental Impact Statement" (page 131).

EirGrid has also had regard to Section 2.2.3 – *Maintain Environmental Focus and Scope* – of the *EPA Guidelines on the Information to be Contained in Environmental Impact Statements (2002)*; this section notes that

“Effectiveness and efficiency in EIA are most easily achieved where all parties ensure that documentation and analysis is confined to those topics and issues which are explicitly described in the relevant legislation. It is important for all parties to maintain a vigilance against the use of EIA to evaluate a wide range of related, but not directly, environmental topics - no matter how well-intentioned or seemingly convenient”.

The EIS therefore does not address the issue of property value or potential devaluation. However, this should not be taken to suggest that EirGrid does not consider this to be an issue that should be addressed by An Bord Pleanála in its determination of the merit of the proposed development. Clearly, An Bord Pleanála is the Competent Authority in deciding what should be taken into consideration in determining an application for statutory consent, having regard to matters of proper planning and sustainable development.

In this specific regard, certain environmental pathways, for example visual impact and noise (as addressed in the EIS), might be assessed to have potential impacts on property, of course depending upon the specific nature of a transmission infrastructure development and its receiving environment. Such potential impact may not necessarily be restricted to the landholding over which a line traverses. The significance of such environmental impact must always be considered against the nature of, necessity for, and strategic benefit of a project. It should also be considered in the context of the route selection process undertaken by EirGrid and its consultants (as addressed in this EIS in respect of Consideration of Alternatives).

On the grounds of general amenity, where possible EirGrid will avoid routing overhead transmission lines close to residential areas. With respect to individual houses, the aim at route selection stage will be to achieve the maximum separation distance between existing dwellings and a planned line route, while also seeking to avoid, or minimise impact upon, other identified technical (from a routing perspective) and environmental constraints. In this context, EirGrid will seek, where possible, to achieve a lateral clearance of 50 metres from the centre of the proposed route to the nearest point of a dwelling. It should be noted that the 50 metre distance is only a routing aim and is not associated with distances that are required for electrical clearance.

With specific reference to the Laois – Kilkenny Reinforcement Project the following is a general outline of the area through which the proposed project passes:

- The route passes through approximately 150 agricultural holdings.
- The northern end of the route consists of mainly good quality tillage land. There is also a portion of tillage land south of Ballyragget on the Ballyragget to Kilkenny section.
- The majority of the land is in grass with the main enterprise being cattle with some dairy farming.
- There is a significant extent of overhead transmission line infrastructure already in the area.
- There is an existing 400 kV line at the northern end of the route area.
- The area of the development also includes existing (and long-established) 110 kV infrastructure, such as is proposed between the planned Coolnabacky substation, and the

existing Ballyragget substation; the proposed 110 kV line between Ballyragget and Kilkenny substations comprises an existing overhead line which is to be upgraded but which will remain as an 110 kV line.

- All of the existing 110 kV infrastructure which is to be upgraded has been previously permitted as 110kV infrastructure.
- A number of houses occur along the area of the proposed development, particularly in the north, in influence of the commercial centre of Portlaoise, and in the south, under the influence of Kilkenny City.
- There has been a considerable amount of residential (and other) property constructed in the vicinity of existing transmission infrastructure in the area of the proposed development, SUBSEQUENT TO the construction of that existing infrastructure. It should be noted that this is the experience throughout the country, and indeed internationally – that the presence of transmission infrastructure in an area does not result in an effective sterilisation of areas from subsequent development.

Table 1 below summarises the dispersion of houses within 150 metres of the proposed overhead transmission lines for the Laois – Kilkenny Reinforcement Project.

Distance from lines (metres)	New 400kV line	New Ballyragget – Coolnabacky 110kV line	Existing Ballyragget – Coolnabacky 110kV line	Existing Athy – Portlaoise 110kV line	Totals
Within 50m	0	0	6	3	9
Between 50m and 100m	0	0	13	4	17
Between 100m and 150m	0	16	30	2	48
Total	0	16	49	9	74

Table 1. Dispersion of Houses within 150 metres of Proposed Lines for the Laois-Kilkenny Project. (source Geodirectory 2012)

There is a multitude of factors that can affect property prices, both in terms of dwellings, and of agricultural land. Given the extent of property development that has occurred in the area of the proposed development, subsequent to the construction and operation of a significant extent of transmission infrastructure in this area, and including the largest forms of such infrastructure (400 kV overhead transmission lines), it can be reasonably concluded that, whilst there may be perceived short-term negative impacts (essentially during planning and construction), the existence of transmission infrastructure, by itself does not unduly influence property values.

Such a conclusion is consistent with other international research on this subject carried out over a number of decades in relation to property values, and potential devaluation as a result of the construction of transmission lines which, have typically failed to show any statistically significant negative impact on property values.

Having regard to the above in the context of the proposed Laois – Kilkenny Reinforcement Project, it is considered that there will be no likely significant impact upon property and property values.

The EIS being submitted in response to the request of the Board comprises the following additional folders which were not included in the ER originally submitted with the application:

- **EIS Main Text (including Non Technical Summary)**

- Chapter 2 – Addition of A1 drawings relating to EIS. These drawings show the full nature and extent of the proposed development including permanent (tower, poleset and conductor locations) and temporary (construction working areas, guarding locations, stringing areas and indicative temporary access routes).
- Chapter 3 Screening and Scoping
- Chapter 4 Alternatives (originally in Volume 2 of the application submission).
- It should also be noted that each environmental chapter of the EIS includes a new section "Interrelationships Between Environmental Factors".

- **EIS Appendices**

The presentation and structure of the appendices is similar to the ER. However, there are a number of additional appendices in the EIS which were not included in the ER as follows:

- Appendix 3.1 – Sample Scoping Letter, Newspaper Advertisement and Summary of Responses
- Appendix 6.2 – Detailed Study of Relevant Kilkenny County Development Plan Visual Designations
- Appendix 6.3 – Winter and Summer Views
- Appendix 10.1 – Site Investigation and Hydrogeological Assessment Proposed Coolnabacky 400/110 kV GIS Substation
- Appendix 11.6 – AECOM Transportation: Haulage Route Assessment

Appendices 6.1 & 6.2 are presented in a separate A3 folder as this facilitates the presentation of the photomontages associated with these appendices.

It should be noted that the NIS (see Appendix 6.2 of the ER) previously submitted in January 2013 remains the same. The original NIS included an appendix (Appendix 8.1 of the ER - Desktop Hydrogeological Assessment for the Proposed Coolnabacky 400/110kV GIS Substation). In preparing the EIS, additional Hydrogeological Site Investigations for the Proposed Coolnabacky 400/110 kV GIS Substation have been undertaken as detailed in Appendix 10.1 above. This appendix should be read in conjunction with the previously submitted NIS.

In conclusion, it is envisaged that this EIS (and this accompanying cover letter) will combine with the particulars of the original application submission to ensure a robust proposal now before An

Bord Pleanála. Any issues arising therein can, if required by An Bord, be expanded upon by way of Further Information or, at its absolute discretion, an Oral Hearing.

Enclosed with this letter are 3 hard copies and 7 electronic copies of the EIS. We will await further instructions from the Board in relation to any further actions.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ray Niland', with a long horizontal flourish extending to the right.

Ray Niland

**Senior Lead Engineer
Transmission Asset Management
Grid Development
EirGrid**