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An Bord Pleanála
Strategic Infrastructure Division
64-67 Marlborough Street
Dublin 1
D01 V902

Re: Proposed 400 kV electricity transmission cables, extension to the existing Kilpaddoge Electrical Substation (approx. 5,500 metres square) and associated works (known as the 'Cross Shannon Project') between the existing Moneypoint 400 kV Electricity Substation in the townland of Carrowdotia South Co. Clare and existing Kilpaddoge 220/110 kV Electricity Substation in the townland of Kilpaddoge Co. Kerry. The development includes work in the foreshore for which a Foreshore Licence is required.

Thursday 30th July 2020

Dear Sir,

In accordance with Section 182A of the *Planning and Development Act 2000 (as amended)*, please find enclosed 3 no. hard copies and 7 no. electronic copies of an application for Approval in respect of the proposed development outlined above.

Written correspondence received from An Bord Pleanála (ABP), dated 11th May 2020, has confirmed the proposed development to be Strategic Infrastructure Development (SID). This correspondence is included with the application.

The plans and particulars accompanying this application comprise:

- Fee Receipt in the sum of €100,000;
- Application Form;
- Statutory Notices – newspaper and site notices; ·
- Drawings – as per a Drawing Schedule; ·
- Natura Impact Statement (NIS); and ·
- Planning and Environmental Considerations Report (PECR)



In particular, we note the Direction of ABP, as included in its correspondence of 7th May 2020 that the application for approval should be accompanied by a NIS.

Also for the convenience of the Board, we enclose an electronic file of the boundary of the application area for use in its GIS software.

The Board's attention is also drawn to the site notices, all of which are printed in indelible ink on a yellow background in accordance with Article 19(4) of the *Planning and Development Regulations 2001* (as amended). This application is being made within 6 months from the date of the making of another application (Clare County Council Reference: 20/318) in respect of land consisting of part of the site to which this application relates. All yellow background site notices have been affixed on rigid, durable material and be secured against damage from bad weather and other causes.

As set out in more detail in Chapter 1 of the PECR, EirGrid is the state-owned independent Transmission System Operator (TSO) with the Statutory function:-

"To operate and ensure the maintenance of and, if necessary, develop a safe, secure, reliable, economical, and efficient electricity transmission system, and to explore and develop opportunities for interconnection of its system with other systems, in all cases with a view to ensuring that all reasonable demands for electricity are met having due regard for the environment."

EirGrid is satisfied that the proposed development of an additional high voltage electricity connection between Moneypoint 400 kV Electricity Station and Kilpaddoge 220 kV / 110 kV is required to comply with, and to implement, its obligations as the statutory Transmission System Operator (TSO) in Ireland.

As set out in Chapter 2 of the PECR with regard to Planning and Land Use Considerations, it is EirGrid's consideration that the proposed development, of itself comprising Strategic Infrastructure Development, is entirely in accordance with, or otherwise supports, key strategic policies and objectives set out within national, regional and local development plans. These include both land use and environmental policies, but also wider policies and objectives relating to economic development and investment, and ensuring energy security.

Overall, the PECR concludes that the proposed development will contribute to the continued growth of the region while maintaining the integrity of the surrounding built and amenity of the natural

environment. The proposed development has considered the cumulative impacts and in-combination effects.

As set out at Chapter 1 of the PECR, EirGrid generally follows a six-step approach when developing and implementing the Best Performing Option (BPO) to any identified transmission network capital project. The proposed development is now at Step 5 which involves the preparation and submission of this application for approval. The previous Step – Step 4 – identified the planning and environmental context and constraints for the transmission infrastructure development, and identified and evaluated a longlist of potential options to meet the need of the project; this led to an identified shortlist, and subsequently, through further multi-criteria evaluation, to a BPO – which forms the basis of this proposed development.

It is considered beneficial for the purposes of the environmental appraisal in respect of the proposed development to include the Step 4 report in this application, as an Appendix to the PECR, notwithstanding the fact that there may be some duplication between information contained in the Step 4 report and information contained in this PECR. In this regard, it should be noted that the Step 4 report was prepared in October 2019, and information and details therein may have been superseded by the information now contained in the PECR, primarily on account of subsequent studies or analysis having been undertaken, additional landowner and public engagement having occurred, etc. Where any discrepancy occurs between information contained in the Step 4 report and that contained in the PECR, the information contained in the PECR should take precedence.

As set out at Chapter 5 of the PECR, the evolution of the proposed development has occurred in the context of a structured process for public participation. This has included engagement with directly affected landowners, with residents and other landowners in the immediate vicinity of the area of the proposed development, the general public, as well as Statutory and non-Statutory stakeholders including the relevant officers of Clare and Kerry County Councils. In addition, EirGrid engaged in the Statutory pre-application consultation process with the Board, per the provisions of Section 182E of the *Planning and Development Act 2000 (as amended)*.

The public participation process has ensured that the proposed development comprises the Best Performing Option in terms of balancing the needs of the network, the obligations of EirGrid as Transmission System Operator, the issues of interest to statutory and non-statutory authorities and agencies, landowners, residents and the general public.

The overall conclusion of the PECR and NIS accompanying this application for Approval is that, subject to the implementation of appropriate mitigation measures, the proposed development will

have no likely significant impact upon its receiving natural, built and human environment, either of itself or in cumulation/interaction with other proposed or permitted development in the area.

Overall, EirGrid is satisfied that the proposed development is a necessary strategic transmission infrastructure development that will facilitate its operation in a safe, secure, reliable, economical, and efficient manner. The consideration of reasonable alternatives, including in respect of transmission infrastructure technologies, construction methodologies, and siting location options, has ensured that the proposed development is entirely in accordance with the proper planning and sustainable development of the area.

We trust the above is in order and look forward to the Board's decision in due course

Yours sincerely,

A handwritten signature in black ink, appearing to be "Tomás Bradley". The signature is fluid and cursive, with a long, sweeping tail.

Tomás Bradley,
Senior Lead Planner