



COMHAIRLE | CLARE
CONTAE AN CHLÁIR | COUNTY COUNCIL

Executive Officer
An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

25th September 2020

A Chara,

Your Ref: ABP 307798-20

AN BORD PLEANÁLA

25 SEP 2020

LTR DATED _____ FROM _____

LDG- _____

ABP- 307798-20

I refer to your correspondence as received by the Planning Authority on the 18th August last with respect to the Cross Shannon 400kV Cable Project.

In response to same please find attached the Planning Report, Road Design Report and Kilrush Municipal District Report of Clare County Council.

Kindly acknowledge receipt of same.

Mise le meas.

Planning Department

An Roinn Pleanála

An Stiúrthóireacht Forbairt Gheilleagrach

Áras Contae an Chláir, Bóthar Nua, Inis, Co. an Chláir, V95 DXP2

Planning Department

Economic Development Directorate

Áras Contae an Chláir, New Road, Ennis, Co. Clare, V95 DXP2



CLARE COUNTY COUNCIL PLANNING REPORT

File Case No:	ABP-307798-20
Applicant:	Eirgrid PLC
Nature & Extent of Development	Cross Shannon 400 kV Cable Project
Location	Carrowdotia South, Co. Clare

Introduction

This report has been prepared following receipt of the above planning file, Natura Impact Statement and associated documents from An Bord Pleanála, as received on the 18th August 2020. The details below set out the response of the Planning Authority to the criteria as set out in the Boards Correspondence.

Development Plan Provisions

The Clare County Development Plan 2017-2023, as varied, is the current operating plan within the county. The main provisions of the plan are set out as follows:

Development Plan Objective CDP6.10: Moneypoint Power Plant

It is an objective of Clare County Council:

To facilitate the diversification and expansion of Moneypoint Power Station and to work with all relevant stakeholders to identify and secure alternative future uses for the Strategic Development Location, that complement and are compatible with the existing energy use, in accordance with the findings and recommendations in the SIFP, in order to ensure on-going employment and support economic growth in the West Clare area.

Development Plan Objective CDP 6.17 Energy Supply

It is an objective of the Development Plan:

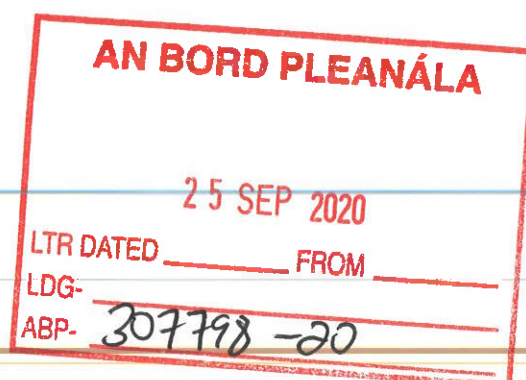
To contribute to the economic development and enhanced employment opportunities in the County by:

- a) Facilitating the development of a self sustaining, secure, reliable and efficient renewable energy supply and storage for the County;
- b) Enabling the County to become a leader in the production of sustainable and renewable energy for national and international consumption through research, technology development and innovation.

Development Plan Objective: CDP 8.37 Energy Security

It is an objective of development plan:

To promote and facilitate the achievement of secure and efficient energy supply, storage and distribution for County Clare.



Development Plan Objective: CDP 8.38 Electricity Networks

It is an objective of Clare County Council:

- a) To facilitate improvements in energy infrastructure and encourage the expansion of the infrastructure within the county;
- b) To facilitate future alternative renewable energy developments and associated utility infrastructure throughout the county;
- c) To collaborate with Eirgrid to facilitate the delivery of quality connection, transmission and market services to electricity generators, suppliers and customers utilising the high voltage electricity system in County Clare;
- d) To collaborate with Eirgrid over the lifetime of the plan to ensure that the county's minimum target of 966MW renewable energy generation is achieved and can be accommodated on the electricity network in County Clare;
- e) To have regard to environmental and visual considerations in the assessment of developments of this nature.

Development Plan Objective CDP11.6 Strategic Development Location B–Moneypoint

It is an objective of Clare County Council:

- a) To safeguard the role and function of Strategic Development Location B –Moneypoint (as per Map 11B) as a key strategic driver of economic growth in the country, facilitating its sustainable growth, operational expansion and diversification, in accordance with national and regional energy objectives – ensuring in particular that all such developments shall not adversely affect species and habitats designated by the Habitats Directive;
- b) To support and facilitate the development of marine-related industry on lands adjacent to Moneypoint which is compatible with the primary use of the SDL as a Strategic Energy Location. All proposed developments shall be in accordance with the Birds and Habitats Directive, Water Framework Directive and all other relevant EU Directives. All proposed development at SDL B shall incorporate the Mitigation Measures as contained in the SIFP – Volume 7 of this Plan - for ensuring the integrity of the Natura 2000 Network.

Development Plan Objective CDP13.4 Shannon Estuary Working Landscape

It is an objective of the Development Plan:

- a) To permit development in these areas that will sustain economic activity of regional and national significance – especially through the protection of resources to sustain largescale energy projects, logistics, large-scale manufacturing and associated infrastructure. All such developments shall be required to conform to relevant management and conservation objectives for designated and protected habitats and species within the estuary;
- b) That selection of appropriate sites in the first instance within this landscape, together with consideration of the details of siting and design, are directed towards reducing visual impact and that residual visual impacts are minimised;
- c) That particular regard should be given to avoiding intrusions on scenic routes and on ridges or shorelines. Developments in these areas will be required to demonstrate:

- i That sites have been selected to avoid visually prominent locations wherever feasible;
- ii That site layouts avail of existing topography and vegetation to reduce visibility from scenic routes, walking trails, public amenities and roads;
- iii That design for buildings and structures reduce visual impact through careful choice of form, finish and colours and that any site works seek to reduce visual impact of the development.

CDP14.8 Natural Heritage and Infrastructure Schemes

It is an objective of the development plan:

To ensure the protection of natural heritage when considering proposed services, infrastructure and roadworks (both realignments and new roads) located in close proximity to, or nearby, protected ecological sites or sites of importance in terms of biodiversity.

Shannon Integrated Framework Plan for the Shannon Estuary

Volume 7 of the Development Plan contains the above framework plan which is an inter-jurisdictional land and marine based framework plan to guide the future development and management of the Shannon Estuary. Key objectives of the plan include:

SIFP MRI 1.2.2 Moneypoint Strategic Energy Location

To safeguard the role and function of ESB Moneypoint as a key strategic driver of economic growth in the Region, encouraging its sustainable growth, operational expansion and diversification in accordance with national and regional energy objectives.

SIFP ERG 1.2: Safeguarding the role & function of energy sites

To safeguard the role and function of the strategic energy infrastructure existing within and adjacent to the Shannon Estuary, and encourage the further sustainable development of energy, enterprise and industry within these identified strategic energy locations, subject to the requirements of the Habitats & Birds Directive, Water Framework Directive, and all other relevant EU Directives.

SIFP ERG 1.3: Facilitating energy development

To facilitate the further development of the energy infrastructure at identified strategic energy sites and encourage appropriate diversification projects subject to compliance with sustainable planning, and the requirements of the Habitats & Birds Directive, Water Framework Directive and all other relevant EC Directives.

SIFP ERG 1.5: Electricity Network

To support and facilitate the sustainable development, upgrade and expansion of the electricity network, transmission, storage and distribution infrastructure ensuring that all such developments comply with the requirements of the Habitats & Birds Directives, Water Framework Directive, and all other EC Directives.

SIFP RE 1.8: Renewable energy development

To support and facilitate the sustainable development of renewable energy developments within and along Shannon Estuary, in support of Ireland's legally binding obligations under EU Directives. All such developments will be required to demonstrate that they do not compromise identified strategic shipping and navigation interests or adversely affect species and habitats designated by the Habitats & Birds Directives, Water Framework Directive and all other relevant EC Directives, and comply with all other planning and environmental considerations.

SIFP RE 1.9: Exploring potential for tidal energy

To explore the potential of tidal energy, as a viable renewable energy resource within the Estuary, in support of Ireland's legally binding obligations under EU Directives, at appropriate locations including the identified Areas of Opportunity. All proposals will be required to demonstrate that such developments or activities are balanced with planning and environmental considerations, and in particular that all such developments shall not compromise identified strategic shipping and navigation interests and comply with the Habitats & Birds Directives, Water Framework Directive and all other relevant EC Directives

Planning History

20/318: Permission granted for the development of a 400 MVA (electrical rating) synchronous condenser which shares the existing 400 KV/17 kV transformer and 400kV underground cable belonging to the existing coal fired unit 2. Granted subject to 7 no. conditions.

19/746: Permission granted for a 1.8 ha site with a 300 to 400 MVA synchronous condenser – including a generator and flywheel building and associated works. 10 year permission granted subject to 6 no. conditions.

18/520: Permission granted for a c.7.5 MW capacity battery storage facility including: (a) up to 3 No. battery storage units (b) a 28 sq. m single storey substation control building; (c) a 28 sq. m single-storey switchgear building; (d) ancillary electrical plant including a transformer and var support unit; (e) a c. 15.6m high lightning mast and c. 18m high SCADA communications mast; (f) a 2.6m high chainlink fence and vehicular access gates via the existing station road to the south of the site; (g) ancillary site works including site clearance.

17/809: PERMISSION granted for development which will consist of two water storage tanks above ground level and an underground pump chamber that will collect the rainwater from two existing runoff lines, to facilitate the retainment of surface water from the site prior to discharge from licensed facility discharge point already on the site.

16/1011: Permission granted for refurbishment of the existing Moneypoint - Oldstreet 400 kV overhead line, partly within Moneypoint complex.

16-616 – GRANTED - to extend the Appropriate Period of Planning Permission P11-457 for the development of electrical transmission infrastructure and associated works

15/81: Permission Granted for a 10-year planning permission for development at Moneypoint Generating Station. The development will comprise an electrical transformer station consisting of two single-storey buildings with associated outdoor electrical equipment, including transformers, lightning protection masts, effluent holding tank, internal roads, boundary fencing around the perimeter of the compound and all associated site development works above and below ground. The proposed development is an amendment to the previously approved electrical transformer station at Moneypoint Wind Farm (CCC Ref: 12-74 APB Ref: PL03.241624).

14-190 – GRANTED - for development at the existing 400 kV substation site, which consists of : A new indoor Gas Insulated Switchgear (GIS) 400 kV substation building (3463m²), 17m high, Two new 400/220 kV transformers with associated Switchgear, Three new 30 meter high lightning masts, and associated drainage and site works. The application relates to previous grant of planning permission reg. ref. P11-457

11-457 – GRANTED - for the development of electrical transmission infrastructure and associated works at and adjacent to the site of an existing 400kV substation site at Moneypoint Power Station complex. The proposed development comprises the following elements: A new indoor Gas Insulated Switchgear (GIS) 400kV substation; A new indoor Gas Insulated Switchgear (GIS) 220kV substation; A new indoor Gas Insulated Switchgear (GIS) 110kV substation; Two new 400/220kV transformers with associated switchgear and connections to new indoor 400kV and 220kV substations; A new 220/110kV transformer with associated switchgear and connections to new indoor 220kV and 110kV substations; Transfer of existing 400kV, 220kV and 110kV connections from the existing substation to the new 400kV, 220kV and 110kV substations, De-commissioning of existing 220kV and 110kV switchgear and 400kV/220kV Transformer; and Relocation of the existing waste segregation area to an area South West of the proposed development within the Moneypoint complex.

06-935 – GRANTED - for the construction of a new canteen building at Moneypoint Generating Station, Carrowdotia South, Kilrush, Co. Clare.

01-1538 – GRANTED (at appeal) - Wind Energy Project. - 9 wind turbines, each having a rated electrical output of up to 2,500 kilo watts. Each wind turbine will comprise a tower about 68 metres high, with a diameter of about 4 metres at the base and 3 metres at the top.

Relevant National, Local and Regional Policies

The following objectives are outlined in the Southern Regional Spatial & Economic Strategy (RSES):

RPO 219 New Energy Infrastructure

It is an objective to support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers (subject to appropriate environmental assessment and the planning process) to ensure the energy needs of future population and economic expansion within designated growth areas and across the Region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs.

RPO 222 Electricity Infrastructure

It is an objective to support the development of a safe, secure and reliable supply of electricity and to support and facilitate the development of enhanced electricity networks and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this plan under EirGrid's (2017) Grid Development Strategy (subject to appropriate environmental assessment and the planning process) to serve the existing and future needs of the region and strengthen all-island interconnection capacity.

Special Area Amenity Order

There are no Special Area Amenity orders which affect the proposed development.

European Sites/NHA's

The subject site is located within the Lower River Shannon SAC (Site Code 002165) and within the River Shannon and River Fergus Estuaries SPA (Site Code 004077). The content of the NIS is noted and it is considered that all mitigation measures should be implemented in full.

Protected Structures/ACA's

There are no protected structures within the subject site, nor is the site located within an ACA.

Drainage/Flooding

It is noted that no changes to the existing drainage network are proposed within the Moneypoint site and that any culverts will be designed to allow the 1% AEP (1 in 100 year) flood flow to pass. The Moneypoint site is not located within a flood risk zone as per the provisions of the Development Plan and having regard to the nature of the development as proposed it is not considered that significant flooding or surface waters issues will arise subject to the mitigation measures as proposed.

Visual Impact

The site of the proposed development is within an area which functions as a power generating station, with an ancillary windfarm already within the complex. It is not considered that the proposal would impact on the visual amenities of the area.

Road Network

Access to the subject site is off the N67 National Secondary Road. Attached to this report are the reports from the Kilrush Municipal District Office and the Council's Road Design Section. It is not considered that the proposal would have a significant impact on the carrying capacity of the national road network, however it is respectfully suggested that the conditions as set out in the attached reports are included in the event of a grant of permission for this development.

Environmental Carrying Capacity of Surrounding Area

It is not considered that the proposal would impact on the amenities of the area having regard to the established use of the site for power generation purposes. The reports submitted with the application have been noted and all mitigation measures as set out in the NIS should be complied with.

Planning Authority's view of the subject development

Clare County Council is fully supportive of the 'Regional Solution' in facilitating the high levels of renewable wind energy output which is expected in the South and West of Ireland onto the existing 400kV network through the construction of the Cross Shannon 400kV Cables. This will assist in contributing to Ireland's national renewable energy and green house gas reduction targets. County Clare has a proud heritage of serving Ireland's energy needs through engineering innovation and harnessing our renewable resources in such a sustainable manner. As outlined above there is significant policy support for the subject development, and having regard to the established use of the site for power generation the principle of development is considered acceptable.

However it should be noted that the Strategic Integrated Framework Plan (SIFP) for the Shannon Estuary has identified the proposed location of the Cross Shannon Cable within an *Area of Opportunity for Tidal Energy (Area of Opportunity J – Moneypoint)*, as set out in Volume 1 of the SIFP (pg. 100) and Volume 3 (pg. 2 and 28).

This opportunity site has been identified at a strategic level in terms of its acceptance and ability to provide the required depth of water to undertake testing for tidal energy. It also provides potential developers with the confidence that such a site has already passed a certain level of assessment from a Planning and Environmental perspective and therefore is more favourable in terms of development. A key factor in the selection of this particular site was the proximity to deep water directly adjacent to the northern shore of the Shannon Estuary thereby providing a unique opportunity for the testing of tidal energy devices which require the depths of water which are afforded at this location ranging between 20 – 40m.

While the Planning and Environmental Report which accompanies the application acknowledges the SIFP, the conclusions are based in terms of acceptability of the loss of between a quarter to a half of this Area of Opportunity (taking the Route Corridor into consideration) on the fact that the SIFP acknowledges that this framework needs to *"provide sufficient flexibility to accommodate projects of potentially national and regional significance that cannot be developed at the proposed Strategic Development locations"*. The Planning Authority were co-authors of the SIFP, and whilst this was indeed the intention, it was not the intention that development associated with a Marine Related Industry site would be located within an Area of Opportunity thereby potentially prejudicing the development of the site for the testing of tidal devices.

While Clare County Council fully appreciates the strategic importance of bringing the wind energy captured in the southwest onto the transmission system, this should be balanced with the needs of other renewable technologies such as tidal devices, seeking to utilise the Shannon Estuary particularly where such sites have been identified at a strategic, plan-led stage. The testing of such devices is also important for economic development as it will attract other industries, create jobs locally and attract an international audience which will ultimately lead to further economic benefit.

Community Gain, Development and Special Development Contributions

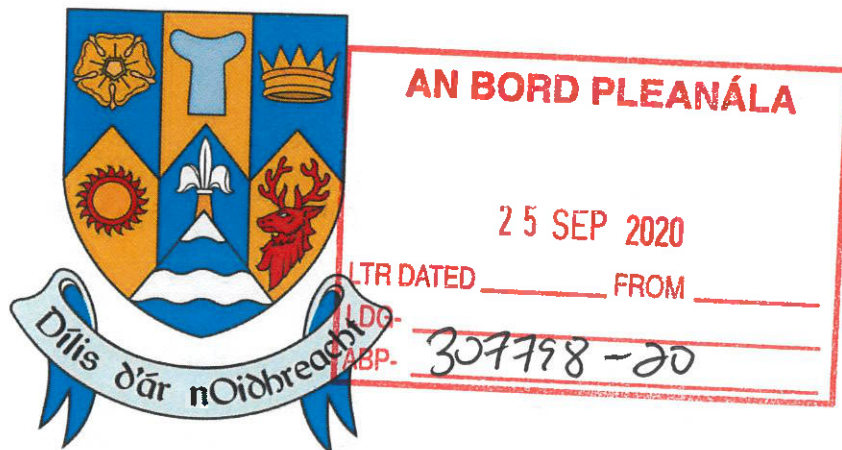
It is considered that development contributions may be applicable under the Councils prevailing Development Contribution Scheme ('Open Development on all land - €23,000 per ha – equivalent rate to be applied). The scheme also caters for renewable energy installations. There are exemptions in the scheme (Table 2) but these are for Marine related industries only. It is not considered that a special development contribution is warranted in this instance.

Conclusion

It is respectfully requested that the Board take the above points into consideration when assessing this application. The Planning Authority has no objection in principle to this development having regard to the established use of the Moneypoint site and noting the strategic benefit of the development for the transmission of renewable energy. However as outlined above, there is a concern that the proposal may potentially prejudice the development of the opportunity site for tidal testing as identified in the SIFP. Where any measures or proposals can put in place to address same the Planning Authority would welcome the opportunity to comment further.



A/Senior Executive Planner
25/09/2020



TO:

██████████ SEP,
Planning Section,
Áras Contae an Chláir,
New Road,
Ennis,
Co.Clare.

21/09/2020

FROM:

West Clare Municipal District (Kilrush);
Kilrush Town Hall,
The Square,
Kilrush,
Co.Clare.

Planning Register Ref.:

ABP 307798 20.

Applicant:

Eirgrid PLC.

Development address:

Moneypoint,
County Clare.

REPORT:

Hi [REDACTED]

I would agree with all the comments made by [REDACTED] SEE, Transportation & Road Design Office, in relation to this application.

I would add –

- Eirgrid should clarify the location of their waste storage facility (*Authorised under the Waste Management Act*) as soon as practicable.
- This will allow the onshore construction traffic management plan (*referred to in table 4.7 of the Outline Construction and Environmental Management Plan*) be prepared and agreed in a timely fashion. This traffic management plan will have to cater for all traffic impacted by the project, and not just the 30 HGV movements per day referred to in the Outline CEMP.
- Prior to the commencement of construction works on site, a full road condition survey must be carried out and submitted to Clare County Council. This road condition survey must include full documentary evidence – including video and photographs – of the road condition prior to construction works commencing.
- Once construction works have been completed on site, a full post-project road condition survey must be carried out and submitted to Clare County Council. This road condition survey must include full documentary evidence – including video and photographs – of the road condition after ad construction works have been completed.
- Any damage to the public road shall be made good to the satisfaction of the Municipal District Roads Engineer (*Clare County Council, West Clare MD, Kilrush Area*).

My primary concern is that the onshore construction works will not damage the public road network, and in particular the N67 National secondary Route.

Please contact me with any queries.

Signed: [REDACTED]

Senior Executive Engineer,
West Clare Municipal District (*Kilrush*).

AN BORD PLEANÁLA

25 SEP 2020

LTR DATED _____ FROM _____

LDG-

ABP- 307798-20

Road Design Planning Report

Date: 18-09-2020

REF: ABP-307798-20

Applicant: EirGrid plc, with the consent and approval of the Electricity Supply Board (ESB)

Project Address: Moneypoint, Co. Clare

OUR REF: ABP-307798-20/JG/OUT/7141

To: Garreth Ruane, Planning

A Chara,

The proposed development will consist of a up to 400 MVA (electrical rating) synchronous condenser which shares the existing 400 KV/17 kV transformer and 400kV underground cable belonging to the existing coal fired unit 2. PERMISSION is also sought to continue the use of the existing underground cable grid connection, including the 400kV/17kV transformer and 400 kV underground cable belonging to the existing coal fired Unit 2 for use by the synchronous condenser into the future. Planning PERMISSION is being sought for a duration of 10 years. This application represents a relocation within Moneypoint of a similar application permitted by Clare County Council under Reg. Ref. P19/746. A Natura Impact Statement (NIS) has been prepared and accompanies this planning application.

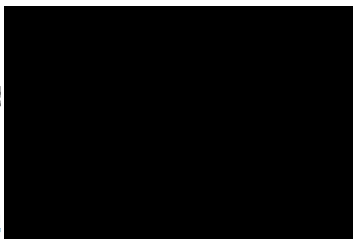
My comments on the above application are as follows:

1. Clarification is sought on the number of HGV movements on or through public roads, their duration, versus the volumetric movement of all materials (imported and exported) to and from the site. It is noted that in the Outline Construction and Environmental Management Plan (CEMP) that it is expected that a maximum of approximately 30 Heavy Good Vehicles (HGV) movements per day will be required during the construction phase at either side of the Shannon Estuary.
2. For public roads the applicant is to complete a road safety audit/assessment, of all construction traffic routes, in accordance with TII road safety audit guidelines before the commencement of any construction activities. The outcomes of which are to be incorporated into the detail design and adopted into the construction traffic management plan (CTMP)/ Construction and Environmental Management Plan (CEMP) .
3. The applicant is to provide details, to be agreed with the Municipal District Engineer's Office, on the mitigation measures to be put in place (at the site access and exit areas)

ensuring that there will not be queuing on the N67 before the commencement of any construction activities.

4. A pre, during and post road, bridges and culverts condition survey is to be completed by the applicant (along the HGV transportation route(s)). This is to be agreed in advance with the Municipal District Engineer's Office before the commencement of any construction activities.
5. A Construction Traffic Management Plan will be required and this is to be coordinated and agreed with the Municipal District Engineer's Office before the commencement of any construction activities.
6. The long term damage impacts of the roads infrastructure, recoverable by the Local Authority/TII, is to be assessed once the Construction Traffic Management Plan has been agreed with the Municipal District Engineer's Office.
7. Advanced construction warning signage including any temporary road marking are to comply with the Traffic Signs Manual current version.
8. Any additions or changes to the existing surface drainage infrastructure (whether temporary or otherwise) are to be agreed with the Municipal District Engineer's Office before the commencement of any construction activities.
9. A Construction Waste Management Plan is to be prepared and agreed with the Local Authority before the commencement of any construction activities.
10. All waste generated and transported off site during the construction and operational phases shall be managed in accordance with the relevant provisions of the Waste Management Act 1996 and associated amendments and regulations thereof.
11. Only appropriately permitted waste contractors and destinations for waste materials shall be used.

Signed



Date: 18/ Sept / 2020


Senior Executive Engineer,
Transportation & Road Design Office