

EirGrid

## Cross Shannon 400 kV Cable Project (Capital Project 0970)

ABP – 307798-20

|                         |                     |
|-------------------------|---------------------|
| <b>AN BORD PLEANÁLA</b> |                     |
| LDG-                    | _____               |
| ABP-                    | <u>307798-20</u>    |
| 02 OCT 2020             |                     |
| Fee: €                  | _____ Type: _____   |
| Time: _____             | By: <u>Rep PofA</u> |

**Submission to An Bord Pleanála by the Planning Department of Kerry County Council in response to this application**

This Submission has been prepared in accordance with the provisions of Section 182A of the Planning and Development Act 2000

**Development Description.**

The proposed development consists of 400kV electricity transmission cables between the existing Moneypoint 400kV electrical Substation in County Clare and the existing Kilpaddoge 220/110kV Substation on site, extension to the existing Kilpaddoge Electrical Substation and associated works.

**Development Location.**

The proposed development is located within the existing 220/110kV Substation site in the town land of Kilpaddoge, County Kerry situated between Ballylongford and Tarbert on the southern shore of the Shannon Estuary. Tarbert Village is located circa 1.5km south east along the L-1010 local road from the site with Ballylongford Village being circa 8km south west of the site. The proposed development will be located to the north of the Eirgrid 220/110kV Substation and adjacent to the shoreline of the River Shannon. A Peaker Plant and a development consisting of Rotating Stabilizers and battery storage containers is under construction on the lands to east of proposed site. The site is accessed via the shared service road serving the Substation which runs north from the L-1010 local road between Tarbert and Ballylongford villages. The proposed site consists of grazing land that falls in ground levels down to the River Shannon. The site is undulating in parts.

**Relevant National, Regional and Local Policies**National Planning Framework: Ireland 2040. (NPF)

The NPF seeks to guide the future development of Ireland, taking into account a projected 1 million increase in the population, the need to create 660,000 additional jobs to achieve full employment and a need for 550,000 more homes by 2040.

The NPF contains 10 National Strategic Outcomes (NSO's) and 75 National Policy Objectives (NPO's). National Strategic Outcome 8, *Transition to Sustainable Energy* seeks to;

*Strengthen energy security and resilience to support an island population of 8 million people through effective north-south electricity grid interconnection as well as exploring other EU interconnection options in the longer term to 2040.*

In particular, the National Planning Framework recognizes the Shannon Estuary and the Shannon Integrated Framework Plan (SIFP) as a Case Study.

Regional Spatial & Economic Strategy for the Southern Region. (RSES)

The RSES sets out the strategic regional development framework for the Region. The primary aim of the RSES is to implement Project Ireland 2040 - the National Planning Framework, at the regional tier of Government and to support NPF policy for achieving balanced regional development.

Regional Policy Objectives's 219 (New Energy Infrastructure) and 222 (Electricity Infrastructure) support proposed development:

**RPO 219:**

*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:

*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 energy infrastructure and interconnection capacity.*

In addition the RSES highlights the Tarbert/Ballylongford landbank as an *Energy Case study* (Section 8.3) and the associated Shannon Integrated Framework Plan as a *Good Practice Example* (Section 4.9.1).

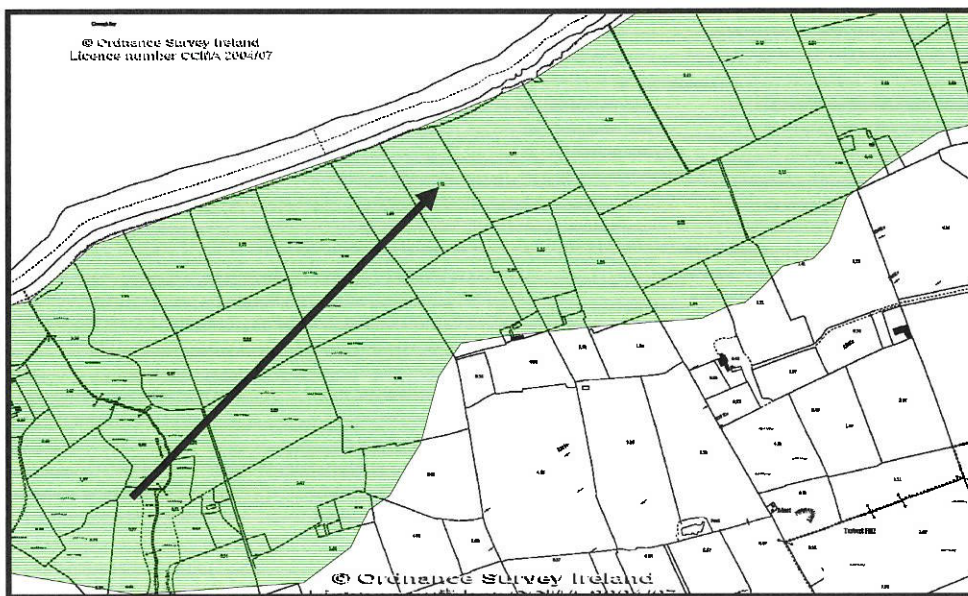
Strategic Integrated Framework Plan for the Shannon Estuary 2013-2020

The Strategic Integrated Framework Plan (SIFP) for the Shannon Estuary is a land and marine based framework plan to guide the future development and management of the Shannon Estuary. It has identified an additional 1,200 hectares for marine related development (9 no. strategic development locations) by building on existing industry connectivity and synergy as well as the existing infrastructure to create a more sustainable and attractive network for further investment.

The Ballylongford development lands are identified in the Plan as one of these 'Strategic Development Locations'. The Kerry County Development Plan 2015-2021 references the SIFP. The proposal complies with the Strategic Integrated Framework Plan for the Shannon Estuary 2013-2020.

Kerry County Development Plan (KCDP) 2015-2021

The proposed development is located on land zoned *Industry* under Kerry County Development Plan 2015-2021.



Site location – area hatched in green represents the Industrial zoning in the area.

Relevant policy in relation to the proposed development is contained in *Chapter 7, Transport and Infrastructure*, and in particular section 7.6 *Energy / Power provision* of the Kerry County Development Plan 2015 – 2021.

Section 7.6.1 states:

*The availability of energy is of critical importance to the continued development and expansion of employment in County Kerry. It is vital that Kerry has sufficient capacity to meet current and future needs. Kerry County Council recognises the essential requirement for energy production and distribution.*

*The development of secure and reliable electricity transmission infrastructure is recognised as a key factor for supporting economic development and attracting investment to the County. Kerry County Council supports the sustainable provision for new high voltage electrical infrastructure, including high voltage transformer stations and new overhead transmission power lines further to no significant adverse effects on the environment or Natura 2000 sites.*

*With increased residential development in the County and a drive for more industrial, commercial and employment generating uses, it will be important to ensure that the capacity of the energy networks is sufficient to meet these demands in a sustainable manner.*

*The Council will continue to support the infrastructural renewal and sustainable development of electricity and gas networks.*

Relevant objectives in support of the proposed development include Objectives EP-1, EP-2, EP-3, EP-4, EP-5, EP-6, EP-7, EP-8, EP-9 and EP-10. The Council would however like to draw the Board attention to the following objectives which are directly relevant to and supportive of the project;

- EP-3** *Facilitate sustainable energy infrastructure provision, so as to provide for the further physical and economic development of the County.*
- EP-4** *Support and facilitate the sustainable development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the County.*
- EP-9** *Support the sustainable implementation of EirGrid's Grid 25 Investment Programme, subject to landscape, residential, amenity and environmental considerations.*

Listowel Municipal District Local Area Plan 2019-2025.

Section 2.2.2 of the recently adopted Local Area Plan for the Listowel Municipal District states that Kerry County Council:

*...recognises the on-going potential of the Tarbert/Ballylongford landbank to be sustainably developed for industry in compliance with the EIA and Habitats Directives.*

In particular, it is an objective of the Council under OS-08 to:

*Support the sustainable development of the land zoned within the Tarbert/Ballylongford area in accordance with the policies and objectives of the Shannon Strategic Integrated Framework Plan and the Kerry County Development Plan.*

**Relevant Planning History Relating to the Subject Site and the Surrounding Area.**

Pl. Ref: 15/5.

Kilpaddoge Energy Limited.

Alterations to the existing station consisting of 1 no. 110/220 kV transformer, 3 no. 110 kV surge arrestors, 3 no. 110 kV cable sealing ends, 1 no. neutral earth resistor, 1 no. lightning mast, new retaining wall with handrail, new single story mv switchgear building and associated drainage and site works.

Permission granted.

PL08.VA0007 (Section 182A, An Bord Pleanála)

Development of a new 220/110kV substation with associated works including the removal of 220/110kV overhead lines and their replacement by a reduced number of lines plus underground cabling.

Permission granted.

Pl Ref: 19/115

Glencloosagh Energy Limited.

A grid stabilisation facility comprising of: the construction up to 4 no. rotating stabilisers, 5 no. battery storage containers, 1 no. control room, 2 transformers and ancillary equipment.

Permission granted.

Pl. Ref: 18/878

Shannon Cleantech Ltd.

A battery energy storage system (bess) facility on a total site area of up to 0.6ha to include up to 26 no. self-contained battery container units with associated heating ventilation and air conditioning systems (hvac), power conversion systems (pcs), step-up transformers, control systems and ancillary electrical components, 1 no. single – storey electricity control building, 1 no. 110kv esb substation, single storey substation control building and associated electrical infrastructure, 1 no. 110 kv generator transformer.

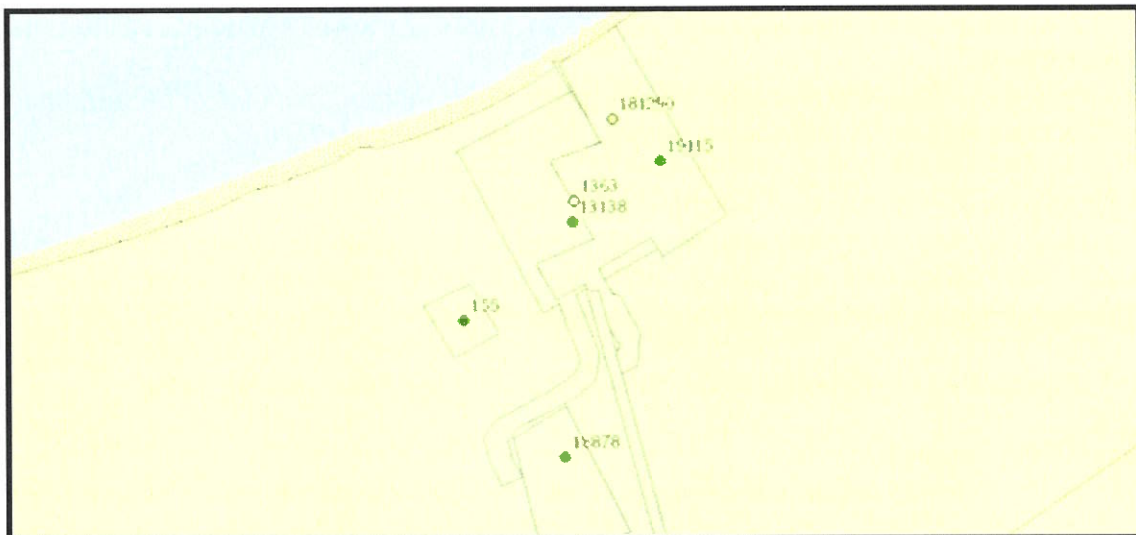
Permission granted.

Pl. Ref: 13/138

Kilpaddoge energy limited.

Construct an electricity peaker power generating plant

Permission granted.



**Map of planning applications in vicinity of proposed development.**

**Special Amenity Area Order.**

There are no Special Amenity Area Orders associated with the proposed site or affected by the proposed development.

**European Designations, National Heritage Area.**

The River Shannon is designated as a Special Protection Area (SPA) and a Special Area of Conservation (SAC), specifically the River Shannon & River Fergus Estuaries SPA and Lower River Shannon SAC.

The Biodiversity Officer, KCC reviewed Section C of the application: Biodiversity, the AA Screening Statement/NIS and the Construction and Environmental Management Plan (CEMP) submitted and stated:

*'In relation to the AA screening Report/NIS, I note that the European sites deemed likely to be significantly affected are the Lower Shannon cSAC and the River Fergus and River Shannon Estuaries SPA. I would concur that other European sites within a 15km radius are unlikely to be affected. This is due to the lack of connectivity; distance from the development and/or lack of supporting and/or functionally linked habitat for the qualifying interests of those European sites. I believe the applicant has provided adequate information on the potential of the development to significantly affect European sites and I would agree that an appropriate assessment is required. I concur with the submission of a NIS to allow the consent authority to appropriately assess the development. I also note the NIS includes an assessment of the project in its entirety ie the consent for a Foreshore Licence as well as the requirement for planning permission. The NIS notes that adverse effects may occur from the terrestrial component of the works and the marine element of the works. This is further assessed in the NIS where impacts that could adversely affect site integrity are identified. They relate to potential impacts on water quality; annexed habitats and species and birds of SCI at construction; operation and decommissioning. I note that a comprehensive list of mitigation measures is again proposed and outlined in the documents including the outline CEMP.*

*In relation to Section C: Biodiversity I believe the section provides a comprehensive overview of the aquatic ecology of the cable route connection. Ultimately, I note the cable will be laid within habitats that exist in a highly dynamic marine environment. Fluctuations in sedimentation would be a normal occurrence for these habitat types. The information provided with the application goes on to assess possible impacts on intertidal habitats and terrestrial habitats. In relation to the latter it is noted that the cable will tie into infrastructure at Moneypoint within habitat type not identified as annexed habitat. At Kilpaddoge the habitat at the shoreline is similarly not annexed habitat with the remainder of the route being within agricultural grassland and/or the existing built infrastructure at this location. Overall possible impacts (direct and indirect) are outlined in the report and assessed with a range of measures that will mitigate impacts identified.*

*Finally, in-combination/accumulative impacts are outlined and assessed in the NIS including the recently granted energy infrastructure in the area of North Kerry and south Clare'.*

#### **Protected Structures, Architectural Conservation Areas & Archaeology.**

There are no Protected Structures or Architectural Conservation Areas on site or affected by the proposed development. Kerry County Council's Archaeologist has examined the proposal and states:

*'Following liaison with the National Monuments Service Underwater Archaeology Unit, Kerry County Council concurs with the recommendations of the NMS in relation to the potential underwater archaeology.*



*Kerry County Council note that no mention is made within the assessment of the significant archaeological material uncovered during previous works within the Kilpaddoge site under excavation/monitoring licences 13E0350, 13E0465, 14E0039, 14E0233, 14E0234, 14E0240 and 14E0241. Particularly relevant are the archaeological features excavated under licence 14E0039 which comprise 6 Neolithic houses/structures and 13E0465 which recent analysis has shown to include evidence for probable Mesolithic occupation. These excavated structures and features were located only 3m above the high-water mark and indicate significant early prehistoric archaeological potential both within and immediately above the intertidal area.*

*Clearly, a comprehensive programme of archaeological testing of all areas of proposed ground disturbance, both within the intertidal zone and along the cable routes to and around the substation at Kilpaddoge is essential to fully assess the potential impact of the proposed development. It is noted that testing is suggested within the archaeological assessment though the density and location of the trenches that will be excavated is not provided and it is proposed that any test excavations would be carried out post planning submission but pre-construction. It would be preferable if these test excavations were carried out sooner rather than later so that preservation in situ would be an option or that sufficient time and scope would be allowed to fully investigate any identified archaeological features.*

*It is also noted that archaeological monitoring is suggested as the 'principal archaeological mitigation during construction' and Kerry County Council would suggest that a comprehensive programme of archaeological testing at an early stage would be more appropriate given the known archaeological potential of the area. Monitoring would not be an appropriate mitigation measure in this instance'.*

#### **Public Surface Water Drainage Facilities and History of Flooding.**

In relation surface water drainage the Listowel Municipal District Engineer has stated:

*'All drainage arising from the proposed development at Kilpaddoge both during construction and the permanent operations phase should be catered for within the site. Outfalls to appropriate discharge points and any necessary consents or landowner agreement will be the responsibility of the applicant. Furthermore, there is no availability and capacity for discharge of surface water or otherwise from the site to public surface water drainage facilities.*

*Listowel Municipal District Office have no records of flooding at the location but the applicants shall satisfy themselves to the risk of flooding at the location and consult with the OPW regarding same'.*

#### **Landscape Status & Visual Impact Assessment.**

The land at this location is zoned Industry as per the Kerry County Development Plan 2015-2021. The site is adjacent to the River Shannon. The site is on sloping ground which falls steeply downhill to the River Shannon. The local road serving the site, the L-1010 is located south of the site. The land rises



from the junction of the access road to the site with the L-1010, rising to a peak before falling downhill towards the Substation site and the River Shannon. The site is therefore not visible from the L-1010 local road and surrounding area.

The main visual impact is from the River Shannon and from across the Shannon in County Clare. However, this is an industrialised landscape with the Kilpaddoge Substation situated at a lower contour level directly south of the proposal and a Peaker Plant and associated Stabilizer Plant under construction to the east of the proposed site. Therefore, when viewed from the Shannon and across the Shannon the proposal will have the existing Substation as a backdrop. It is considered that the proposed development is commensurate with the existing development on site and is considered an extension to the existing established development in the area. The visual impact is considered acceptable having regard to the industrial zoning of the land and the existing and permitted development in the vicinity.

### **Carrying Capacity and Safety of Road Network.**

It is considered that the proposed development will not have a negative impact on the carrying capacity and safety of the road network in the area subject to compliance with the mitigation measures outlined in the planning application documentation submitted and subject to compliance with the suggested conditions attached hereunder. Kerry County Council recognises that the attachment of these and or any alternative / additional conditions is a matter for the Board.

1. *Surface water runoff from the access road and entrance area shall be controlled to the satisfaction of the planning authority to prevent any discharge onto the public roadway.*
2. *The splayed entrance and the area between the entrance and the public road shall not interfere with roadside drainage which shall be maintained, repaired or made good by providing a dished water channel constructed of concrete or piped culvert to the satisfaction of the Area Engineer.*
3. *The splayed entrance shall not cause surface water or seepage water to flow onto the road surface. No water from the proposed development shall be allowed to flow onto the public road.*
4. *The applicant shall make good any damage to the public road or existing drainage that may result from the proposed development to the satisfaction of the Area Engineer.*
5. *The applicant or operator shall institute appropriate measures to prevent material being drawn from the site onto the public road. No concrete, earth, soil or other material from this site shall be drawn or deposited onto the public road.*
6. *The applicant shall provide sightlines of 160m in both directions of the proposed site access road from a point 2.0m back along the centerline of the direct access measured from the line of the nearside edge of the paved surface.*
7. *Pre and post construction phase surveys shall be undertaken by the applicant in conjunction with Kerry County Council to assess but not limited to the condition of the L-1010 roadway pre and post construction phase. Pre and post construction phase surveys shall be undertaken on other roads to be utilised for haulage during construction and agreed with the Area Engineer in advance.*
8. *Pre and post construction phase principal inspections of structures and culverts within the road network shall be undertaken at locations to be agreed with the Area Engineer in advance.*

9. *A bond shall be provided by the applicant in respect of the section of public roads to be used as haul routes for construction. This is to be agreed with Kerry County Council prior to any construction works commencing.*
10. *In the event abnormal loads are required to access the site any required amendments to the road network shall be agreed in advance with the Road Authority and reinstated thereafter to the satisfaction of the Area Engineer. Any land acquisition or temporary access required for the conveyance of abnormal loads will be incumbent on the applicant to agree and provide with the appropriate landowner.*
11. *Traffic Management arrangements for the works shall be in accordance Chapter 8 of the 'Traffic Signs Manual'.*
12. *Adequate provision shall be made within the site for storage of materials, marshalling of incoming and outgoing deliveries and on-site parking of staff involved in the construction phase of the works.*
13. *Consultation with Kerry County Council's Capital Project office will be required in advance of the commencement of construction works to coordinate construction activities with the L-1010 Road Improvement Project.*

**Environmental Carrying Capacity of the subject site.**

It is considered that the development is not likely to have a negative impact on the receiving environment in the area subject to adhering to all mitigation measures outlined in the application documentation submitted and subject to compliance with the recommendations outlined in this report from Kerry County Council.

**Community Gain Condition.**

The attachment of a community gain condition is a matter for An Bord Pleanála, however the Council is mindful to remind the Board that significant energy developments have taken place in the County recently which have involved significant construction vehicle movements and wind energy developments. These developments have included a community gain condition as part of the decision to grant permission.

**Relevant Section 48 Development Contribution Scheme Condition.**

Kerry County Councils present Development Contribution Scheme was adopted in July 2017. The following rates may be of relevance to the Board:

Substations on the 110/220kV transmission network

Roads & Transport - €13.30 per sqm + €2500 per ha.

Community & Amenity - €6.70 per sqm + €2500 per ha.

**Special Contribution Conditions.**

There are no special contribution conditions recommended to be attached to this proposal.

**Planning Authority view in relation to the proposed development.**

The proposed development is located on part of the Tarbert/Ballylongford Land Bank. These lands are land zoned *Industry* under Kerry County Development Plan 2015-2021. In addition, the Shannon Integrated Framework Plan has designated these lands as a *Strategic Development location* and has

zoned the lands for *Marine Related Industry*. Both the Tarbert/Ballylongford landbank and the SIFP are recognised in both the National Planning Framework and the Regional Spatial and Economic Strategy.

Kerry County Council submit to the Board that the proposed development complies with National, Regional and Local Planning Policy.

The visual impact is considered acceptable having regard to the zoning of the land at this location, the topography of the landscape, the existing 220/110kV Substation on site and Peaker Plant and Rotating Stabilisers site under construction adjacent to the proposed development site.

The proposal is to use the existing service road serving the Eirgrid Substation site and Peaker Plant and Rotating Stabilisers site under construction, therefore additional roads infrastructure is not necessary. Having regard to the completed development, and development under construction on site it is considered that the proposed development will not result in an increase in vehicular movements post construction.

The proposed development is not likely to impact negatively on residential amenities in the area owing to the significant distance of the site from residential properties.

The proposed infrastructure will link the Tarbert/Ballylongford landbank to the 400kV network thereby further positioning this regionally recognised strategically important landbank and energy hub for future development.

It is considered that the proposed development will lead to significant grid strengthening and the connection of Kerry to the 400kV network. The presence of a strengthened grid infrastructure is essential to ensure the ongoing economic development of the County and will greatly strengthen Kerry's ability to attract external investment.

A grant of permission is recommended subject to conditions.

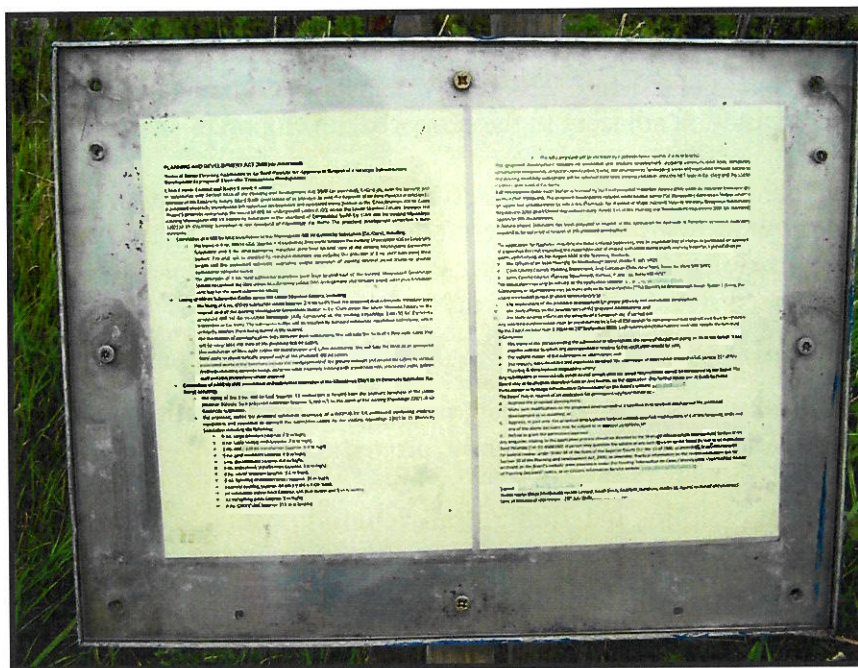
*Signed*

  
\_\_\_\_\_  
**Director of Job Creation/Sustainable Economic Development**  
**Kerry County Council**

Date:

*1/10/2020*

# 1.0 Photographs



Site notice on site



Site notice on site





**Shared access road to site from L-1010 local road to south**



**View northwards over site**



**Existing Kilpaddoge 220kV Substation site**



**Existing Kilpaddoge 220kV Substation site**





**View to Peaker Plant and Slabilizer facility under constrection to east of site**



**View west over proposed site**





**Views west over proposed site**



**River Shannon and Moneypoint Station across from site**

## **2.0 Reports from other Council Departments**

## MEMORANDUM

Date/Dáta: 3<sup>rd</sup> September 2020.

To/Chuig: [REDACTED]

From/O: [REDACTED]

**Re/Lc: Proposed 400kV Electricity Transmission Cables, Extension to the existing Kilpaddoge Electrical Substation (approx. 5,500 square metres) and Associated Works (known as the Cross Shannon Project) between the existing Moneypoint 400kV Substation in the townland of Carrowdotia South, Co. Clare and existing Kilpaddoge 220/110kV Electricity Substation in the townland of Kilpaddoge, Co. Kerry**

The documentation submitted in relation to the above application to An Bord Pleanála includes an underwater and terrestrial archaeological assessment of the route options with suggested mitigation in relation to the identified archaeological constraints. Following liaison with the National Monuments Service Underwater Archaeology Unit, Kerry County Council concurs with the recommendations of the NMS in relation to the potential underwater archaeology.

In relation to the terrestrial archaeological assessment of the proposed works at and around the preferred/chosen southern landfall at S2 in the townland of Kilpaddoge Kerry County Council note that no mention is made within the assessment of the significant archaeological material uncovered during previous works within the Kilpaddoge site under excavation/monitoring licences 13E0350, 13E0465, 14E0039, 14E0233, 14E0234, 14E0240 and 14E0241. Particularly relevant are the archaeological features excavated under licence 14E0039 which comprise 6 Neolithic houses/structures and 13E0465 which recent analysis has shown to include evidence for probable Mesolithic occupation. These excavated structures and features were located only 3m above the high-water mark and indicate significant early prehistoric archaeological potential both within and immediately above the intertidal area.

Clearly, a comprehensive programme of archaeological testing of all areas of proposed ground disturbance, both within the intertidal zone and along the cable routes to and around the substation at Kilpaddoge is essential to fully assess the potential impact of the proposed development. It is noted that testing is suggested within the archaeological assessment though the density and location of the trenches that will be excavated is not provided and it is proposed that any test excavations would be carried out post planning submission but pre-construction. It would be preferable if these test excavations were carried out sooner rather than later so that preservation *in situ* would be an option or that sufficient time and scope would be allowed to fully investigate any identified archaeological features.

It is also noted that archaeological monitoring is suggested as the 'principal archaeological mitigation during construction' and Kerry County Council would suggest that a comprehensive programme of archaeological testing at an early stage would be more appropriate given the known archaeological potential of the area. Monitoring would not be an appropriate mitigation measure in this instance.

Regards,

[REDACTED]  
County Archaeologist

**Memo****Date/Dáta:** September 22nd, 2020**To/Chuig:** [REDACTED] Planning**From/O:** [REDACTED]**Re/Le:** Report on the Cross Shannon 400KV SI application at Kilpaddoge Co Kerry and Carrowdotia South, Co Clare

In reference to the above strategic infrastructure project and its various components as outlined in the Planning Application Documentation (PAD) and other information submitted with the application, I would note the following.

I have reviewed the reports submitted with the application specifically Section C: Biodiversity and the AA Screening Statement/NIS. An outline CEMP was also included with documentation which I have also reviewed.

In relation to the AA screening Report/NIS, I note that the European sites deemed likely to be significantly affected are the Lower Shannon cSAC and the River Fergus and River Shannon Estuaries SPA. I would concur that other European sites within a 15km radius are unlikely to be affected. This is due to the lack of connectivity; distance from the development and/or lack of supporting and/or functionally linked habitat for the qualifying interests of those European sites. I believe the applicant has provided adequate information on the potential of the development to significantly affect European sites and I would agree that an appropriate assessment is required. I concur with the submission of a NIS to allow the consent authority to appropriately assess the development. I also note the NIS includes an assessment of the project in its entirety ie the consent for a Foreshore Licence as well as the requirement for planning permission. The NIS notes that adverse effects may occur from the terrestrial component of the works and the marine element of the works. This is further assessed in the NIS where impacts that could adversely affect site integrity are identified. They relate to potential impacts on water quality; annexed habitats and species and birds of SCI at construction; operation and decommissioning. I note that a comprehensive list of mitigation measures is again proposed and outlined in the documents including the outline CEMP.

In relation to Section C: Biodiversity I believe the section provides a comprehensive overview of the aquatic ecology of the cable route connection. Ultimately, I note the cable will be laid within habitats that exist in a highly dynamic marine environment. Fluctuations in sedimentation would be a normal occurrence for these habitat types. The information provided with the application goes on to assess possible impacts on intertidal habitats and terrestrial habitats. In relation to the latter it is noted that the cable will tie into infrastructure at Moneypoint within habitat type not identified as annexed habitat. At Kilpaddoge the habitat at the shoreline is similarly not annexed habitat with the remainder of the route being within agricultural grassland and/or the existing built infrastructure at this location. Overall possible impacts (direct and indirect) are outlined in the report and assessed with a range of measures that will mitigate impacts identified.

Finally, in-combination/accumulative impacts are outlined and assessed in the NIS including the recently granted energy infrastructure in the area of North Kerry and south Clare.

Mise le Meas

[REDACTED] Biodiversity Officer, Kerry County Council, County Buildings,

Tralee, Co Kerry. Ph [REDACTED]

[REDACTED]  
Wed 9/23/2020 3:06 PM

To: [REDACTED]

Hi [REDACTED]

Please find hereunder a response in regard to the query of the Board relating to **the availability and capacity of public surface water drainage facilities and any history of flooding relevant to the site**

*All drainage arising from the proposed development at Kilpaddoge both during construction and the permanent operations phase should be catered for within the site. Outfalls to appropriate discharge points and any necessary consents or landowner agreement will be the responsibility of the applicant. Furthermore, there is no availability and capacity for discharge of surface water or otherwise from the site to public surface water drainage facilities.*

*Listowel Municipal District Office have no records of flooding at the location but the applicants shall satisfy themselves to the risk of flooding at the location and consult with the OPW regarding same.*

Don't hesitate to contact me if you require further information.

Thanks and regards,

[REDACTED]

[REDACTED]

A/Senior Executive Engineer | Listowel Municipal District Engineer |  
Roads, Transportation & Marine | Kerry County Council |

Listowel Municipal District Office | Kerry County Council | Arás an Phiarsaigh | Listowel |

Tel: [REDACTED] | e-mail: [REDACTED]

**MEMORANDUM**

To: [REDACTED] Executive Planner, Planning Department, Kerry County Council  
From: [REDACTED], A/Senior Executive Engineer, Listowel MD  
Date: 22<sup>nd</sup> September 2020 Re: SID - EirGrid Cross Shannon 400 kV Cable Project

Please find hereunder recommendations regarding the proposed EirGrid Cross Shannon 400 kV Cable Project in the context of connection to the Kilpaddoge Substation and roads on behalf of Listowel Municipal District. Construction access and permanent operations access is proposed via the existing access to the Kilpaddoge Substation from the L1010 Tarbert Coast Road. Section 2.3 and 3.5 of the 'Outline Construction and Environmental Management Plan' also proposes a new internal access track. 1. Surface water runoff from the access road and entrance area shall be controlled to the satisfaction of the planning authority to prevent any discharge onto the public roadway. 2. The splayed entrance and the area between the entrance and the public road shall not interfere with roadside drainage which shall be maintained, repaired or made good by providing a dished water channel constructed of concrete or piped culvert to the satisfaction of the Area Engineer. 3. The splayed entrance shall not cause surface water or seepage water to flow onto the road surface. No water from the proposed development shall be allowed to flow onto the public road. 4. The applicant shall make good any damage to the public road or existing drainage that may result from the proposed development to the satisfaction of the Area Engineer. 5. The applicant or operator shall institute appropriate measures to prevent material being drawn from the site onto the public road. No concrete, earth, soil or other material from this site shall be drawn or deposited onto the public road. 6. The applicant shall provide sightlines of 160m in both directions of the proposed site access road from a point 2.0m back along the centreline of the direct access measured from the line of the nearside edge of the paved surface. 7. Pre and post construction phase surveys shall be undertaken by the applicant in conjunction with Kerry County Council to assess but not limited to the condition of the L-1010 roadway pre and post construction phase. Pre and post construction phase surveys shall be undertaken on other roads to be utilised for haulage during construction and agreed with the Area Engineer in advance. 8. Pre and post construction phase principal inspections of structures and culverts within the road network shall be undertaken at locations to be agreed with the Area Engineer in advance. 9. A bond shall be provided by the applicant in respect of the section of public roads to be used as haul routes for construction. This is to be agreed with Kerry County Council prior to any construction works commencing. 10. In the event abnormal loads are required to access the site any required amendments to the road network shall be agreed in advance with the Road Authority and reinstated thereafter to the satisfaction of the Area Engineer. Any land acquisition or temporary access required for the conveyance of abnormal loads will be incumbent on the applicant to agree and provide with the appropriate landowner. 11. Traffic Management arrangements for the works shall be in accordance Chapter 8 of the 'Traffic Signs Manual'. 12. Adequate provision must be made within the site for storage of materials, marshalling of incoming and outgoing deliveries and on-site parking of staff involved in the construction phase of the works. 13. Consultation with Kerry County Council's Capital Project office will be required in advance of the commencement of construction works to coordinate construction activities with the L1010 Road Improvement Project.

Yours sincerely,

[REDACTED]  
A/SEE,  
Listowel Municipal District Engineer,  
Kerry County Council

