Consolidate Prescribed Bodies Observations

Eirgrid Cross Shannon Cable - FS 007083

Contents

Marine Survey Office (MSO)

18/02/2021

After careful consideration the Marine Survey Office has no objection to the above referenced application from a navigational safety perspective. However the following points shall be of note;

- The applicant shall engage with Shannon Foynes Port company throughout the construction phase of the subsea cables to ensure the safety of navigation is maintained for all mariners within the sea area covered by the application.
- An appropriate Marine Notice detailing the works and vessels engaged in said works shall be published for the information of all marine users in the Shannon Estuary.
- The applicant shall ensure the information regarding the final location, depth and shore markings of submarine cables is submitted to the UKHO for inclusion on relevant navigation charts.

Department of Defence (DOD)

24/02/2021

In response to your e-mail seeking feedback on the Eirgrid Cross Shannon Cable, based on the information supplied and following consultations with our Naval Service colleagues, the Department of Defence would like to make the following observations:

A Temporary Notice to Mariners (NTM) should be issued during the cable laying operation to inform vessels transiting through the area that the operation is taking place.

In addition, a NTM will should be issued once the work is complete clearly indicating the cables location on the river bed to indicate that vessels should not anchor in the location of the cable.

Geological Survey Ireland (GSI)

03/03/2021

With reference to your email received on the 15 February 2021, concerning the Foreshore Application for Eirgrid Cross Shannon 400 kV Electricity Cable, Geological Survey Ireland (a division of the Department of the Environment, Climate and Communications) would like to make the following comments.

Geoheritage

Geological Survey Ireland is in partnership with the National Parks and Wildlife Service (NPWS, Department of Housing, Local Government and Heritage), to identify and select important geological and geomorphological sites throughout the country for designation as geological NHAs (Natural Heritage Areas). This is addressed by the Geoheritage Programme of Geological Survey Ireland, under 16 different geological themes, in which the minimum number of scientifically significant sites that best represent the theme are rigorously selected by a panel of theme experts.

County Geological Sites (CGSs), as adopted under the National Heritage Plan, include additional sites that may also be of national importance, but which were not selected as the very best examples for NHA designation. All geological heritage sites identified by Geological Survey Ireland are categorised as CGS pending any further NHA designation by NPWS. CGSs are now routinely included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system. CGSs can be viewed online under the Geological Heritage tab on the online Map Viewer.

The CGSs for Kerry remain unaudited and as such there is limited detailed information on each site available publicly. The sites are listed in a master list of unaudited sites and are presented on Geological Survey Ireland's

Map Viewer as sites with buffer zones but no specific site boundary. The audit for Co. Clare was completed in 2005. The full report details can be found here. **Our records show that there are no CGSs in the vicinity of the Cross Shannon Electricity Cable.**

Groundwater

Groundwater is important as a source of drinking water, and it supports river flows, lake levels and ecosystems. It contains natural substances dissolved from the soils and rocks that it flows through, and can also be contaminated by human actions on the land surface. As a clean, but vulnerable, resource, groundwater needs to be understood, managed and protected.

Geological Survey Ireland's Groundwater and Geothermal Unit, provides advice, data and maps relating to groundwater distribution, quality and use, which is especially relevant for safe and secure drinking water supplies and healthy ecosystems.

Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. We recommend using the groundwater maps on our Map viewer. which should include: wells; drinking water source protection areas; the national map suite - aquifer, groundwater vulnerability, groundwater recharge and subsoil permeability maps. For areas underlain by limestone, please refer to the karst specific data layers (karst features, tracer test database; turlough water levels (gwlevel.ie). Background information is also provided in the Groundwater Body Descriptions. Please read all disclaimers carefully when using Geological Survey Ireland data.

Groundwater flooding maps (historic & predictive) are available through our web viewers. The historic flood maps provide information of historic flooding, both surface water and groundwater. The predictive groundwater flood map provides information on the probability of future karst groundwater flooding (where available). For information on the development and limitations of these flood maps, please check the user guidance notes on our website.

Geological Mapping

Geological Survey Ireland maintains online datasets of bedrock and subsoils geological mapping that is reliable and accessible including depth to bedrock and physiographic maps. These datasets include bedrock data and subsoil classifications. We would encourage you to use these data which can be found here, in your future assessments.

Geological Survey Ireland is continually developing new 3D models and improving upon existing models, as new geological data and software tools emerge. Our 3D models are accessible on our model viewer, where they can be interrogated, faults and stratigraphic units examined, virtual cross-sections and boreholes created.
Depending on their intended application and audience, models are developed at different scales and to different depths below the ground surface. Our 3D models offer a key element of geotechnical risk management by identifying areas requiring more site investigation.

Geohazards

Geohazards can cause widespread damage to landscapes, wildlife, human property and human life. In Ireland, landslides, flooding and coastal erosion are the most prevalent of these hazards. We recommend that geohazards be taken into consideration, especially when developing areas where these risks are prevalent, and we encourage the use of our data when doing so.

Geological Survey Ireland also engaged in a national project on Groundwater Flooding. The data from this project may be useful in relation to Flood Risk Assessment (FRA) and management plans, and is described in more detail under 'Groundwater' above.

Coastal Vulnerability while seen as a potential geohazard, is discussed in more detail under our marine and coastal unit information below.

Natural Resources (Minerals/Aggregates)

Geological Survey Ireland provides data, maps, interpretations and advice on matters related to minerals, their use and their development in our Minerals section of the website. The Active Quarries, Mineral Localities and the Aggregate Potential maps are available on our Map Viewer. We would recommend use of the Aggregate Potential Mapping viewer to identify areas of High to Very High source aggregate potential within the area.

In keeping with a sustainable approach we would recommend use of our data and mapping viewers to identify and ensure that natural resources used in the proposed development are sustainably sourced from properly recognised and licensed facilities, and that consideration of future resource sterilization is considered.

Geotechnical Database Resources

Geological Survey Ireland continues to populate and develop our national geotechnical database and viewer with site investigation data submitted voluntarily by industry. The current database holding is over 7500 reports with 134,000 boreholes; 31,000 of which are digitised which can be accessed through downloads from our Geotechnical Map Viewer. We would encourage the use of this database as part of any baseline geological assessment of the proposed development as it can provide invaluable baseline data for the region or vicinity of proposed development areas. This information may be beneficial and cost saving for any site-specific investigations that may be designed as part of the project.

Marine and Coastal Unit

Our marine environment is hugely important to our bio-economy, transport, tourism and recreational sectors. It is also an important indicator of the health of our planet. Geological Survey Ireland's Marine and Coastal Unit in partnership with the Marine Institute, jointly manages INFOMAR, Ireland's national marine mapping programme; providing key baseline data for Ireland's marine sector. The programme delivers a wide range of benefits to multi-sectoral end-users across the national blue economy with an emphasis on enabling our stakeholders. Demonstrated applications for the use of INFOMAR's suite of mapping products include Shipping & Navigation, Fisheries Management, Aquaculture, Off-shore Renewable Energies, Marine Leisure & Tourism and Coastal Behaviour.

INFOMAR also produces a wide variety of seabed mapping products that enable public and stakeholders to visualize Ireland's seafloor environment https://www.infomar.ie/maps/downloadable-maps/maps. Story maps have also been developed providing a different perspective of some of the bays and harbors of the Irish coastline https://www.infomar.ie/maps/story-maps/exploring-dingle-bay-different-perspective. We would therefore recommend use of our Marine and Coastal Unit datasets available on our website and Map Viewer.

The Marine and Coastal Unit also participate in coastal change projects such as CHERISH (Climate, Heritage and Environments of Reefs, Islands, and Headlands) and are undertaking mapping in areas such as coastal vulnerability and coastal erosion. Further information on these projects can be found at **here**.

Other Comments

Should development go ahead, all other factors considered, Geological Survey Ireland would much appreciate a copy of reports detailing any site investigations carried out. Should any significant bedrock cuttings be created, we would ask that they will be designed to remain visible as rock exposure rather than covered with soil and vegetated, in accordance with safety guidelines and engineering constraints. In areas where natural exposures are few, or deeply weathered, this measure would permit on-going improvement of geological knowledge of the subsurface and could be included as additional sites of the geoheritage dataset, if appropriate. Alternatively, we ask that a digital photographic record of significant new excavations could be provided. Potential visits from Geological Survey Ireland to personally document exposures could also be arranged.

The data would be added to Geological Survey Ireland's national database of site investigation boreholes, implemented to provide a better service to the civil engineering sector. Data can be sent to [redacted], Land Mapping Unit, at [redacted].

Geological Survey of Ireland (GSI) Observation 2

21/04/2021

Having reviewed ABPs further information request and the subsequent information submitted by [redacted], please note that Geological Survey Ireland has no further response or submission

to make in light of this information and our original comments and observations remain unchanged.

Observations from the Geological Survey of Ireland (GSI) received through the Department of Environment, Climate and Communications (DECC).

15/06/2021

Please note that Geological Survey of Ireland has no specific comment or observations to make on this matter at this time since our response to the DHLGH of 21 April 2021.

Marine Institute (MI)

07/03/2021

A foreshore application has been submitted for the Cross Shannon Subsea Cable project development by EirGrid Plc. The development comprises the installation of a 400kV circa 5km AC (alternating current) underground cable between the existing Moneypoint 400kV GIS substation in County Clare and the existing Kilpaddoge 220kV substation.

Laying of 400 kV Submarine Cables across the Lower Shannon Estuary, including:

- The laying of 4 no. 400 kV submarine cables (approx. 2.8 km each) from the proposed land-submarine transition bays located east of the existing Moneypoint Generation Station in Co. Clare across the Lower Shannon Estuary to the proposed 400 kV Air Insulated Switchgear (AIS) Compound at the existing Kilpaddoge 220/110 kV Electricity Substation in Co. Kerry. The submarine cables will be installed by standard submarine installation techniques, which primarily involves them being buried in the seabed.
- The installation of communication links between both substations, this will take the form of a fibre optic cable that will be integrated into each of the proposed 400 kV cables.
- The installation of fibre optic cables for maintenance and cable monitoring, this will take the form of an armoured fibre cable wrapped helically around each of the proposed 400 kV cables.
- Associated works in the foreshore include the reinforcement of the ground beneath and around the cables by various methods including concrete ramps, concrete cable channels, infilling with gravel/concrete, articulated pipes, gabion wall and rock protections where required.

A Planning and Environmental Considerations Report and Natura Impact Statement (NIS) were prepared and submitted with the application. These documents consider both the onshore and foreshore aspects of the overall project.

The NIS identifies the likely interactions between the proposed project and the conservation features of all Natura 2000 sites in the vicinity. With certain mitigation measures, the interactions identified during construction conclude that the construction phase of the development is unlikely to impact on the integrity of the conservation sites. What does not appear to have been considered in the NIS is the operational aspects of the development and if this may have an impact on certain conservation features. In particular, no consideration is given to the likely impact of the operation of 400 kV DC transmission line and if this will be any different to the current configuration that uses 220 kV. In particular, the impact that magnetic fields may have on designated fish species (Salmon, lamprey) and marine mammals (Bottlenose dolphin) should have been considered.

The closest licenced aquaculture site (T06/233) to the proposed development is approximately 4km. On the basis of the information provided in the planning report, the development is unlikely to impact on any licenced aquaculture activities. There are no known fisheries in the area. It should be noted the closest aquaculture site indicated in the Planning and Environmental Considerations Report is identified as T08/004BO and while this is correctly identified as a fishery order area, it should be noted that this is not a licenced aquaculture site and is not governed by DAFM aquaculture licencing legislation (Fisheries Act 1997).

Marine Institute (MI) Observation 2 in light of applicant's response of 08 June 2021

08/07/2021

Having reviewed the response from [redacted] (on behalf of EIRGRID) the Marine Institute has a number of observations:

1. The NIS is supposed to be a stand-alone document and should not have to rely on information derived from a communication during a separate licencing process.

2. Furthermore, it is important to note that in relation to the submission as it related to aquatic species, that the lack of evidence of impact is not evidence of no impact. While the Marine Institute accepts that, for some species, magnetic fields as navigational aids may be replaced by olfactory cues in riverine situations, this does not mean that the sensitivity to magnetic fields is disabled.

3. The Marine Institute suggests that the operators, if licenced, engage in research to address the issues raised in the attached (see Appendix 1) reprint which have direct relevance to the issues highlighted. The recommendations therein will help identify (and model) specific interactions and behavioural modification (if any) between aquatic species and EMF.

Notwithstanding and specifically in relation to the Foreshore licencing process, the Marine Institute is broadly satisfied with the response and have no further observations.

Marine Institute (MI) Observation 2 in light of applicant's response of 23 August 2021

26/08/2021

The Marine Institute welcomes the commitment for future research with regard to EMF and will engage where relevant.

The Marine Institute has no more observations on this application

Environmental Protection Agency (EPA)

15/03/2021

I refer to your correspondence received 15th February 2021 requesting observations from the Agency on the above application and accompanying Natura Impact Statement, and to further information pertaining to EirGrid's planning application to An Bord Pleanála received, as per your email dated 9th March 2021.

In accordance with the requirement as set out the Foreshore Regulations 2011 (S.I. No. 353 of 2011), the Agency advises as follows:

1. The Agency notes from the Planning and Environmental Considerations Report (30th July 2020) submitted with the Foreshore application (page 6) that - *"There are no planned dredging and/or 'Dumping at Sea' activities associated with the project. A Dumping at Sea permit is not required."* Furthermore, the Natura Impact Statement (July 2020) notes on page 93 *that "for the construction phase of the proposed project there will be no marine dredging or 'Dumping at Sea'"* and has ruled out the potential for significant effects from the proposed project in combination with ongoing maintenance dredging activities in the Shannon estuary.

2. Shannon Foynes Port Company was granted a Dumping at Sea Permit, Reg. No. S0009-03, on 21st December 2020 for dumping at sea activities associated with maintenance dredging in the Shannon Estuary over the period 2020 - 2026. This permit authorises the loading of dredged material at Ted Russell Dock and approaches, Limerick and at Foynes Harbour and the dumping of the dredged material at three established dumping sites in the upper and lower Shannon Estuary.

3. L&M Keating Maritime Limited was granted a Dumping at Sea Permit, Reg. No S0020-02, on 5th December 2017. This permit authorises plough dredging at Kilrush marina approach channel until 30th September 2024 to maintain sufficient draft for vessels using the marina.

4. Aughinish Alumina Limited was granted a Dumping at Sea Permit, Reg. No S0026-01, on 28th July 2016, which authorises plough dredging activities adjacent to the jetty at Aughinish until 31st August 2024 to maintain navigational depths and berthing access for ships.

5. All three permits and all associated application and enforcement documentation, including Annual Environmental Reports, are available to view on the Agency's website at the following web link: http://www.epa.ie/terminalfour/DaS/index.jsp.

The Agency would further advise:

- That the proposed activity shall not result in a contravention of the Water Framework Directive 2000/60/EC, Habitats Directive 92/43/EEC, Bathing Water Directive 73/160/EEC or Environmental Liabilities Directive 2004/35/EC.

Commissioners of Irish Lights (CIL)

26/03/2021

Irish Lights has reviewed the application for the above development and has the following observations:

- In relation to mitigation aspects with respect to marine traffic, it is stated in the Planning and Environmental Considerations Report (PECR) Section 15 Summary of Mitigation Measures' (Material Aspects, Including Traffic, P255) that "Navigational impacts will be minimised through consultation with the Shannon Foynes Port Company (SFPC) and other stakeholders as part of the Foreshore Licence process. These will be stipulated in the granted Foreshore Licence process". No specific mention is made of any possible installation of aids to navigation, or consideration if this may be required. Irish Lights recommends that SFPC as the Local Lighthouse Authority be consulted specifically on any requirements for installation of aids to navigation which will require Statutory Sanction from Irish Lights.

- In relation to marine traffic movements in the estuary, the application and PECR note (section 14.2.2.1) approximately 1800 vessel movements annually, the majority of which are bulk carriers, cargo ships or chemical/oil tankers. The report notes that SFPC confirmed that there is "no defined navigational channel" and that the largest vessels tend to use the centre and northern parts of the estuary. Given the relatively narrow operational channel area for deep-draught vessels in this section of approximately 0.5NM/900m (due to the shallows to the west of Tarbert) and the requirement for vessels to maintain a safe distance of 500m from installation vessels, it will be important to manage and account for traffic movements during construction, particularly deep-draught vessels, so that safety of navigation is maintained. Irish Lights recommends that mitigation measures to account for traffic movements be agreed with SFPC in advance.

- The PECR notes that the Shannon Estuary is "predominantly a commercial estuary, with little recreational boats accessing the estuary". Nevertheless the applicant should be cognisant of the charted anchorage areas for smaller vessels at Glencloosagh Bay close to the existing 220kV cables immediately to the west of the southern landfall and how availability of this anchorage location for smaller vessels might be impacted by the works, particularly during the construction phase."

Commission for the Regulation of Utilities (CRU)

26/03/3021

The CRU is aware of the project and it is present in the latest version of Eirgrid's transmission development plan (project no. CP0970). However, regarding EirGrid's foreshore application itself, we don't have any comments.

Inland Fisheries Ireland (IFI)

06/04/2021

Overview:

The proposed works involves the laying of 400kV underground cables across the Lower Shannon Estuary between the existing Moneypoint 400kV Electricity Substation in the townland of Carrowdotia

South Co. Clare and the existing Kilpaddoge 220/110 kV Electricity Substation in the townland of Kilpaddoge, Co. Kerry.

IFI comment:

IFI notes the correspondence received to date in regard to this work. This application has a detailed mitigation measures for pollution and for the construction works. Section 3.6.2 of NIS details mitigation measures in terms of pollutants, sediment and biosecurity. If all mitigations measures are put in place this should reduce the risk of any incident affecting the estuarine environment.

In terms of noise, while the NIS details no significant adverse effects of the noise to the diadromous species (salmon or lamprey) as species will move out of the vicinity. These species are migratory and will potentially need to pass through the site on the migrations either upstream or downstream. The NIS document does not mention the European Eel which is protected under Eel Regulation 1100/2007 and should be taken into account, glass eels will be arriving in December-February, but a cohort of the population will remain in the estuary for the duration of the continental phase of lifecycle, while silver eels will be migrating out to sea from August to January.

While the reference to the Habitats Annex II species is noted there are other fish species inhabiting the vicinity of the works sites and IFI would point out that the mitigation measures and guidance of NPWS in regard to marine mammals are not transferrable to fish species. The fish remain invisible to any shore or boat-based observer. Mitigation measures should aim to reduce the sound generated, in intensity and duration. The use of soft-start and ramp-up procedures for any sound generating surveys undertaken – both on a day-to-day basis and on re-start after any stoppages within any day should be undertaken. This measure should be a condition of the foreshore licence. The comments of IFI in this regard relate to fish species of conservation significance and of leisure angling significance all of which constitute part of IFI's brief.

It is recommended to contact the Sea Fisheries Protection Agency (SFPA) to seek advice regarding the timing of survey works to avoid clashing with spawning periods of commercial fish in the area. This will reduce any potential for noise damage to larval and juvenile life stages of fish when they are more susceptible to noise damage than adults.

The timings of the work should be cognisant of the migratory window of diadromous species. We would like to clarify how the construction works will progress across the channel. It will be important to ensure that there is free passage for fish species along one bank to allow species migrating up and downstream. While some works will take place during the 7am - 7pm time period 0thers will be over 24 h0urs which could interfere with fish migrations.

We note the additional information supplied to An Bord Pleanala in relation to the electromagnetic field and the documented effects on different fish species.

The local IFI office in Limerick should be notified one (1) week in advance of the commencement of works.

Observations received from Inland Fisheries Ireland (IFI) through the Department of Environment, Climate and Communications (DECC)

07/05/2021

In respect of the above-named foreshore licence application, Inland Fisheries Ireland (IFI) has considered the application and has the following further observations and recommendations to

make. IFI acknowledge that considerable pre-planning consultation has taken place between the project proponents and Inland Fisheries Ireland and that the outcome of this consultation is reflected throughout the CEMP and NIS.

During construction, IFI require that:

- All discharges to and through the surface water collection and disposal system to groundwater and thence to surface water shall not be of environmental significance.

- All mitigation measures identified in the CEMP and NIS are implemented in full.

- IFI recommend that all marine activities begin with a ramp-up or 'soft-start' procedure to more fully mitigate the impact of any noise on the movement of fish species through the works area.

- There shall be no permitted discharges to surface water resources of contaminated water or surface water run-off from the development.

- Servicing including refuelling of plant and equipment shall only be undertaken on impermeable hard standing areas.

- All plant and equipment used within the subject site shall carry spill clean-up kits and not be used or operated if there is evidence of leakage or damaged oil seals.

- There shall be no discharge during the construction period of cementitious materials or residues thereof to the surface water or drainage network.

- When cast-in-place concrete is required, all works shall be undertaken in the dry and effectively isolated from entering any receiving surface or foul sewers for a period sufficient to cure the concrete.

- Concrete delivery vehicles shall be precluded from washing out at locations that could result in a discharge to the surface or foul sewers.

- Where cement or lime is stored on site, it shall be held in a dry secure area.

- All oils and fuels used on or within the site shall be stored in secure bunded areas and servicing including refuelling of plant and equipment shall only be undertaken on impermeable hard standing areas.

- Where temporary diesel or petrol driven pumps are used within the site, they shall be positioned within portable bunded units.

- Any silt curtains to be deployed should comply with the relevant European Standard CE 1137-CPR-0613/29.

In relation to the Emergency Response Plan, IFI suggest that all staff working in the vicinity of watercourses are aware of procedures to prevent silt or other pollutants from reaching watercourses. Sufficient materials to aid in diversion/containment on any such spillage should be

readily available and stored at close distance. Contact details for local IFI staff can be supplied to the contractor once appointed to be added to the Emergency Response Manual.

IFI will require consultation on the final CEMP, EOP and specific works method statements with the contractor as appointed.

Inland Fisheries Ireland (IFI) Observation 2 in light of applicants response of 08 June.

16/06/2021

IFI are happy with the response and have no further comments to make.

Department of Housing, Local Government and Heritage Water and Marine Advisor (WMA).

12/04/2021

Project Description:

As part of the Cross Shannon Cable Project Eirgrid propose laying 4 no. 2.8km long 400kV Electricity Subsea Cables across the Shannon Estuary between Moneypoint Co. Clare and Kilpaddoge, Co Kerry. The cables will be installed by standard installation techniques, which in the most part involves them being buried in the seabed. Two (2) no fibre optic cables will be included with each of the 400 kV cables, 1 of the fibre optic cables for communication links between both substations which will be integrated into the 400 kV cables and the second fibre optic cable for maintenance and cable monitoring which will be an armoured cable wrapped around the 400 kV cable. The associated works will include the reinforcement of the ground beneath and around the cables by various methods including concrete ramps, infilling with gravel/concrete, articulated pipes and rock armour protection.

Site Inspection:

The site of the southern landfall was inspected on 15 October 2020 and the site of the northern landfall on 03 December 2020. The northern landfall is directly adjacent to the Moneypoint Power station and an existing cable crossing landfall similar to the one now proposed. The foreshore at this location is very inaccessible and rocky. The southern landfall is at Kilpaddoge north of the under construction Electricity Substation. The shore and foreshore at Kilpaddoge is a cobble beach and is accessible to public from a public road 1km to the east.

Assessment:

The foreshore of the Shannon Estuary is Stated owned and the works as proposed are part of Eirgrid's development of the national electricity transmission infrastructure and so are in the public interest. Considering the shore and foreshore on the southern landfall is a cobble beach and assessable to the public it is important that when completed the proposed works do not impede access along the shore or foreshore and following the works the foreshore should be restored to a natural like condition. The works if completed as proposed and in compliance with the conditions set out below will not have significant adverse impacts on navigation, fisheries or the environment.

Recommendation:

The Water and Marine Advisory Unit (WMAU) recommends approval of the application for a foreshore licence for 4 no. 400kV Electricity Subsea Cables across the Shannon Estuary between Moneypoint Co. Clare and Kilpaddoge, Co Kerry subject to the following conditions:

- The Drawing Titled "Foreshore Licence Map", Drawing No: 379408-MMD-XX-00-GIS-N-1009 Rev. 2 Dated: 01/07/2020 should be attached to and referenced in the licence document

- Following burial of the cables on the foreshore at the southern landfall the foreshore shall be back filled with native beach material at pre works beach grade level and foreshore restored to natural like condition so as to not impede public access along the foreshore and to reduce the visual impact of the works.

- The works shall be conducted in accordance with documents and drawings submitted with the application.

The Department shall be notified 2 weeks prior to any works proceeding.

Underwater Archaeology Unit (UAU)

22/04/2021

We note the response from EirGrid and FI as submitted to ABP. The submission made as FI in response to the National Monuments Service's (NMS) requirements is confusing and contradictory.

Dive Survey/Archaeological Assessment: SS12:

It is unclear how the recommended exclusion zone of 100m can be narrowed to 60m until the archaeological assessment has been undertaken to inform on whether the potential anomaly SS12 is cultural in nature or not. EirGrid suggests that the depth of the water in the area precludes diving as it is at the safety limits and propose further remote sensing survey (without specifying what type of remote sensing will be employed). However, at the end of the paragraph, the submission states that a hand-held metal detection survey will accompany the dive survey. It is therefore unclear if an archaeological dive survey will be carried out or not. While remote sensing can be undertaken again to more closely assess this area, our previous recommendations (see below) as issued remain unchanged, i.e. for visual survey of SS12.

Dive Survey and Archaeological Testing: M10 & S1:

The response as submitted as FI by EirGrid suggests that archaeological testing can be done via remote sensing survey – which is an impossibility as both activities are completely different. It refers to the proposed survey methodology for SSI2, as recommended by EirGrid. This is contradictory as remote sensing is, as the name suggests – remote, non-invasive assessment, while archaeological testing requires physical excavation by the archaeologist to assess and interpret directly the area under question. It is therefore also unclear as stated by EirGrid whether archaeological testing will be carried out, though there is reference to '…proposed test trenches for both sites will be in included in a licence Application Report' to NMS. As above, if further

geophysical survey is considered then that is fine, but our requirements for archaeological testing remains unchanged (see below).

To reiterate NMS's and Kerry County Council's Archaeologist's observations, as issued previously: this is an area of extremely high archaeological potential and therefore requires more detailed archaeological assessment in the form of further archaeological assessment and testing.

Archaeological dive survey & Archaeological Testing:

It is stated that the report on the results of further archaeological assessment and testing will be submitted 'in advance of any proposed works taking place'. As previously recommended by NMS: It is strongly advised that the archaeological dive survey and archaeological testing is carried out in advance of the works contractor being engaged, to ensure that results inform final details for cable placement/completion, particularly if significant archaeological remains are identified, and thus prevent any risk of delays to works when plant and machinery are on site.

It should be borne in mind that should significant archaeological remains be identified, further archaeological mitigation may be required by way or preservation in situ/avoidance or full archaeological excavation.

As previously stated the National Monuments Service has no objections to the foreshore licence being granted once the following is included as conditions of any grant of permission:

Dive Survey and Archaeological Testing: M10 & S1:

- A 100m exclusion zone shall remain in place until such time as SS12 has been fully and more closely assessed. Based on the results submitted to and consideration by the NMS of the results, the exclusion zone may remain in place (i.e. 100m), may be reduced (to 60m) or indeed prove to be unnecessary should the anomaly not be of cultural significance.

- If, on safety grounds, there cannot be an archaeological dive survey, then an ROV survey should be undertaken to ensure the anomaly is visualised and can be fully assessed in real time by the archaeologist engaged for the project. The ROV survey shall assess the wider area around SS12 to ensure there is no associated material in the immediate area.

- The archaeologist should be on board the vessel when the ROV survey is being undertaken to ensure they can assess the results in real time.

Dive Survey and Archaeological Testing: M10 & S1:

- A detailed plan for the archaeological testing in the area of the south landing S1 is to form part of the licence application and shall follow the route of the cables to the existing substation.

- The area where the localised magnetometer anomalies M10 are located on the nearshore/onshore area at Moneypoint for the northern landing N2 to be the subject to archaeological testing.

- The location, nature and extent of all test trenches should be provided and sufficient trenches should be put in place to assess fully the area from the foreshore (at low water) and inshore for N2 to identify what the magnetometer anomalies are on the foreshore (at low water) to the green field areas and on to the substation for S2 to ensure the line of the cables are fully archaeologically tested.

- The methodology submitted should include a detailed finds retrieval strategy.

Archaeological Dive and Testing Report:

Once all surveys and testing have been completed, the full information should be compiled into a Report submitted to the Underwater Archaeology Unit, National Monuments Service for review and further comment in advance of any works taking place. The applicant shall be prepared to be advised by the Department in this regard.

Department of Agriculture, Food and the Marine (DAFM).

30/04/2021

There are no specific conditions to be included.

BIM have expressed concern as it appears the proposed activity may cut through the eastern end of the oyster fishery order T08/004BOFO, which is owned by Atlantic Shellfish Ltd. This needs to be brought to the attention of Eirgrid and BIM suggest that the EIRGRID Project Liaison Officer make contact with local stakeholders in this regard.

Irish Coast Guard (ICG)

11/05/2021

The Irish Coast Guard would like to draw attention to the provisions of the National Maritime Oil/HNS Spill Contingency Plan (and its suite of standard operation procedures), June 2021 and the associated national legislation articulated in the Plan.

Specifically in terms of contingency preparedness and planning for emergency response and environmental protection for offshore/at sea operations.

The National Maritime Oil/HNS Spill Contingency Plan is available at the following location.

https://www.gov.ie/en/publication/79e5d-national-maritime-oilhns-spill-contingency-plan-nmoscp/#:~:text=The%20National%20Maritime%20Oil%20%26%20HNS,facilities%20and%20land%2Dbased%20sources.

Sea Fisheries Protection Authority (SFPA)

25/05/2021

Project Description:

Proposed electricity transmission cables (Cross Shannon Cable Project), which includes the laying of 400kV underground cables across the lower Shannon estuary from Moneypoint, Co. Clare and Kilpaddoge, Co. Kerry. Three (3) elements make up the proposed project, connection of the cable at Moneypoint, laying the cable and connection to Kilpaddoge.

Within Part 4 (pre-application process) of the application form submitted it is recorded that the SFPA advised that the area is not within their remit and directed the project to IFI for comment.

The location of the proposed development is in the lower Shannon Estuary and therefore unlikely to disrupt any wild fisheries in the immediate area.

There is a presumed dormant, licenced aquaculture site for oysters on the Clare side of the development (Licence number T08/004BO). The applicant has stated that they are investigating the oyster fishery order and if any plans for developing the aquaculture site.

The shellfish production area of Ballylongford is outside and seaward of the proposed development area and should not be affected by the cable laying.

All spillages and pollution events at the development sites which may cause potential contamination of seafood are to be immediately reported to the Dingle SFPA office.

Met Eireann (ME)

25/05/2021

After studying the application, it is not envisaged that this project would have any negative impact on the Met Eireann observational infrastructure.

Health and Safety Authority (HSA)

28/05/2021

The Health and Safety Authority, in its role as the Central Competent Authority under the Chemicals Act (Control of Major Accident Hazards Involving Dangerous Substances) Regulations 2015, has advised An Bord Pleanala that it does not advise against the granting of planning permission.

Bord Iascaigh Mhara (BIM)

16/06/2021

BIM, Ireland's Seafood development Agency wish to use this opportunity to ensure that the current and future needs and concerns of the seafood sector are appropriately considered.

We note that fisheries and aquaculture interests have already been identified. The proposed route of the cable intersects with the corner of an oyster fishery order and the proposed route is approximately 5.5km from the nearest aquaculture licence.

BIM would request that consultation is carried out with the aquaculture operators in the area and that operators are made aware of construction works and timings in advance of their commencement. It is noted that consultation has been held with Atlantic Shellfish ltd, who hold the oyster fishery order. Should you require assistance with any further engagement, BIM can provide assistance.

Construction and excavation works associated with laying the cables and reinforcement of the ground beneath and around the cables may have the potential for suspension of sediments which together with any pollutants within them, could have a negative impact on filter feeding oysters.

Sustainable Energy Authority of Ireland (SEAI)

16/06/2021

With regards to this application which is for the installation of 4 x 400 KV submarine cables across the Shannon Estuary from Moneypoint to Killpaddoge in Co Kerry, we support this development as it will allow for improved export capability from wind generation projects in South West Kerry into the existing 400KV network. Such work is of benefit to the South West and will ensure more efficient transmission of renewable generation and prevent local constraints on the system.

National Parks and Wildlife Service (NPWS)

07/07/2021

The NPWS have no comment to make on this application.