

TDPNI Consultation  
SONI Ltd.  
12 Manse Road,  
Belfast  
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Northern Ireland

30<sup>th</sup> January 2019

Our Ref: SCP180405.2

**Re. Draft Transmission Development Plan for Northern Ireland 2018–2027 and SEA Environmental Report**

Dear Mr Davison-Kernan,

We refer to your invitation, dated 27<sup>th</sup> November 2018, to provide comments on the Draft Transmission Development Plan for Northern Ireland 2018–2027 (the ‘Plan’) and associated SEA Environmental Report.

In our role as an environmental authority under Irish SEA Regulations, we focus on promoting the full and transparent integration of the findings of the Environmental Assessment into plans and programmes, and advocating that the key environmental challenges are addressed.

This submission is not part of a formal transboundary consultation process under the SEA Directive. Our comments and observations are provided in the context of ongoing cooperation and discussion between the EPA and plan making authorities in Northern Ireland.

*Integration of the SEA*

We acknowledge that the recommendations in the SEA Environmental Report have been clearly integrated into the Plan. The Plan includes specific chapters related to the SEA (and other environmental assessments), and includes tables describing the SEA mitigation measures and SEA monitoring proposed to be carried out over the lifetime of the Plan.

*All-Island Grid Support*

We note the coordinated all-island approach to transmission planning between SONI and Eirgrid. This should help to ensure the continued security and stability of an all-island grid network, capable of supporting both jurisdictions over the Plan’s lifetime, in conjunction with Eirgrid’s Grid 25 Implementation Plan 2017-2022.



The general commitment in Policy PDP2 to promote the development of a sustainable grid by balancing technical, economic, environmental, social and delivery goals and priorities is acknowledged.

#### *Project Development*

We welcome the inclusion of *Table 9.1 Proposed SEA Mitigation Measures* in the Plan, which clearly shows what mitigation measures will be required, and further developed upon, at design and project stage.

The Plan acknowledges that SEA-related monitoring could be used to inform annual environmental reporting. This will provide a mechanism to assess the implementation and effectiveness of the relevant SEA mitigation measures. This monitoring should also assist in assessing potential cumulative effects that may arise in implementing projects arising from the Plan over its lifetime.

#### **EPA's Remit in relation to Public Exposure to Electromagnetic Fields (EMF)**

Our remit is being expanded to include public exposure to EMF. While our specific functions have yet to be set out, we anticipate that our role will include some degree of measurement or monitoring of public exposure to EMF, as well as providing information and advice on EMF to the Irish Government and the public.

In their plan '*Grid 25 Implementation Plan 2017-2022*', Eirgrid have committed to independent EMF monitoring and compliance as well as compliance with relevant international guidelines. In finalising the Plan, it may be useful for SONI to consider EMF related monitoring in a transboundary capacity, as appropriate.

#### **Landscape**

The Regional Spatial and Economic Strategies (RSES), which implement the National Planning Framework – Ireland 2040 at the regional level, and which are currently at Draft Plan stage, include provisions for the protection of landscape and the carrying out of landscape characterisation assessments. They will assist in assessing the potential for transboundary landscape impacts of grid-related planning and development in the border region.

It would be useful to consider supporting a joint approach, with Eirgrid, regarding protecting areas of high landscape amenity in the border region, as appropriate.

#### **Biodiversity**

We acknowledge the policies and objectives included to protect biodiversity. It would be useful to consider amending Policy ENV4 to also include the protection for key ecological linkages / corridors.

## Environmental Report Comments

### *Existing Environment*

In *Section 5 – Baseline and Relevant Environmental Issues*, there is merit in providing relevant maps showing the location of both environmental sensitivities (fisheries/shellfisheries, designated habitats and species, water quality etc.) within and adjacent to the Plan area (including RoI). This is relevant in the context of assessing potential for transboundary environmental effects.

### *Other Key Plans / Programmes to consider*

Our earlier comments, made during the SEA scoping stage, included some suggested key plans which may be useful to consider from a transboundary perspective. These include the National Planning Framework, Draft Regional Spatial and Economic Strategies (for the Northern and Western Region and the Midland and Eastern Region), National Adaptation Framework, National Mitigation Plan and National River Basin Management Plan for Ireland 2018-2021.

Additional key national plans currently being prepared, which may be useful to consider, include the Draft National Energy and Climate Plan and the Renewable Electricity Policy Development Framework. Ireland's national Marine Spatial Plan is also currently being prepared and may be useful to consider over the lifetime of the Plan, in terms of potential opportunities and synergies relating to marine related grid connectivity.

If you have any queries or need further information in relation to this submission, please contact me directly. I would be grateful if you could send an email confirming receipt of this submission to: [sea@epa.ie](mailto:sea@epa.ie).

Yours Sincerely,



Tadhg O'Mahony  
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SEA Section  
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