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1 General

1.1 Executive Summary

1. Some of the points raised by third parties in their Statements of Case do not easily fit within the structure of the Rebuttal Technical Reports. This “General” Rebuttal Technical Report is intended to capture such issues.
2. The general issues raised include: Name of the Project; Reliance on ROI application; EIA specialists; Consultation; Transboundary effects; Alleged Deficiencies in the ES; issues with the Routeing assessment and “Damage to the Environment”.
3. Both the Consolidated ES and Consolidated ES Addendum deal with all these issues and detailed responses to each of these concerns are outlined within this Rebuttal Technical Report.
4. The name of the project is clearly defined in the Consolidated ES Addendum and the planning application documents make clear what the application is and where it is proposed.
5. The EIA process has been co-ordinated by AECOM, a multi-national engineering and environmental consultancy and founder member of the Institute of Environmental Management and Assessment’s (IEMA) EIA Quality Mark. All the EIA specialists are appropriately qualified and have been listed in the SONI Statement of Case for the project (December 2016). There are no deficiencies in the Consolidated ES and its Addendum. The application in Northern Ireland does not “rely” upon the application made in Ireland¹, and of course preceded that application. While that application now has planning approval (consented by An Bord Pleanála 21 December 2016), separate applications were required because of the separate jurisdictions. SONI and EirGrid (the applicants) have closely co-ordinated and cumulative and transboundary effects have been appropriately addressed. However the application in Northern Ireland is robust and self-contained.
6. In terms of “damage to the environment”, as identified in the Planning Statement of Case for the project:

¹ Also called the Republic of Ireland.

“...it is accepted that the proposed Tyrone-Cavan Interconnector produces some environmental impacts that are unavoidable. However, none are of such significance that they would either individually or cumulatively outweigh the overriding national and regional need for the proposed Tyrone-Cavan Interconnector and the benefits to be gained. The proposed Tyrone-Cavan Interconnector is clearly acceptable in planning terms.”

7. A robust consultation process has been undertaken for the project both by the applicant and the statutory authorities. This includes transboundary consultation.
8. The aviation authorities in both jurisdictions have confirmed that there will be no aviation issues resulting from the project. SONI and EirGrid will be responsible for all sections of the proposed Interconnector in Northern Ireland and Ireland respectively.
9. An extensive routeing assessment has been undertaken for the project. This did not take the form of a quantification approach (ranking environmental receptors and selected routes). This suggested approach from the third party is not considered to be as robust or logical as the approach that was undertaken and presented in the Consolidated ES and its Addendum.

1.2 About the Authors

10. This Rebuttal Technical Report is intended to capture issues raised by third parties that do not directly correspond to the other Rebuttal Technical Reports. Accordingly, the report has been prepared by multiple authors including SONI legal representatives and Mr Fay Lagan.
11. Mr Lagan is a chartered environmentalist with a wide ranging experience in the environmental field. He has over 15 years' experience in major environmental projects including Environmental Impact Assessment (EIA). He is a graduate of Queen's University with a Masters in Applied Environmental Sciences. His principal experience is in the EIA of projects in the UK and Ireland in the energy and highways sectors but has also worked on water sector developments and mixed used development projects.

1.3 Policy

12. No Policy issues have been raised by third parties or the Department that require rebuttal in this Rebuttal Technical Report.

1.4 Guidance

13. No Guidance issues have been raised by third parties or the Department that require rebuttal in this Rebuttal Technical Report.

1.5 Further Environmental Information for the Purposes of the Inquiry

14. In this Rebuttal Technical Report, it is not necessary to introduce new information to address any point made by third parties or the Department and its consultees.

1.6 Name of the Project

15. In the SEAT Statement of Case, Page 2, Paragraph 3, sub section a states:

“a)The SONI planning application, by being out of date, is in contradiction with many aspects of the actual North-South Interconnector Application submitted by EirGrid in the Republic of Ireland on 9 June 2015. The simple description of the project as the ‘Tyrone-Cavan’ interconnector is factually incorrect and misleading. The ROI submission by EirGrid clearly states that the ‘Tyrone-Cavan interconnector’ no longer exists, rather it is now called the ‘North-South Interconnector’. More importantly, the EirGrid planning application of 9 June 2015 has removed the originally proposed substation at Kingscourt and hence there is no physical structure designated to be located at Kingscourt anymore, making any reference to a ‘Tyrone-Cavan Interconnector, both incorrect and misleading. This has consequences in terms of inaccurate public consultation, especially for those communities in the border area.”

Response

16. SONI has clearly set out what the name of project refers to in the Consolidated ES, its Addendum, the planning forms and drawings. The Department for Infrastructure has clearly advertised the project in-line with statutory requirements with lists of townlands, post codes and adjacent road names online and in local media. The name of the project is specifically

addressed in Chapter 1 of the Consolidated ES Addendum (Volume 2, Page 3 Paragraph 9):

“As the project has developed and evolved over a number of years, the names used to describe the proposed interconnector have also developed. For clarity, the following terms have been used:

- The proposed interconnector: The overall project from Turleenan to Woodland (i.e. both the SONI and EirGrid sections), including all proposed works;*
- The Tyrone – Cavan Interconnector: That portion of the proposed interconnector located in Northern Ireland being proposed by SONI; and,*
- The North-South 400 kV Interconnection Development: That portion of the proposed interconnector located in the Republic of Ireland being proposed by EirGrid, and which comprises an application for Statutory Approval to the relevant authority in Ireland, An Bord Pleanála.”*

1.7 EIA Specialists

17. In the SEAT Statement of Case, Page 2, Paragraph 3, sub section c states:

The ES contains 20 chapters, each making bald statements and alleged expert analysis and opinion. Yet there is not a single mention, other than Aecom periodically and in a general sense, of who specifically is responsible for each topic, have any experts been employed or is the ES simply a literature research approach to each topic? For example, chapter 7 on EMF – a very important topic of concern for the public. The executive summary (p174) states that: “The Proposed Development will fully comply with the Government policy on exposure of the general public to EMFs, which is based on numerical exposure guidelines. The exposure guidelines in place in the UK as a result of Government policy, formulated in 2004 and reiterated in 2009, are those published in 1998 by the International Commission on Nonionizing Radiation Protection (ICNIRP), applied in the terms of the 1999 European Union Recommendation. These guidelines take account of all the relevant scientific evidence.

This statement is unattributed, is an opinion not a fact and one which SEAT vehemently is in disagreement with. Likewise the next paragraph of the summary states:

“Such compliance..... No interference is expected with implanted medical devices”. Again the obvious question is what expert, if any, has made this assertion?

It is the view of SEAT that all of the statements and conclusions drawn in each chapter of the ES cannot be evaluated as they are made without reference to any expertise used.

Response

18. Technical specialists, with appropriate academic and professional qualifications, and the required skills and experience, were appointed to undertake the specific subject matter assessments and author the corresponding Technical Reports. The background of the authors is set out in each Technical Report addressing the specific subject matter, as appended to SONI's Statement of Case.
19. Technical Report 5 (paragraph eight on page three) details the background of Dr John Swanson who is the specialist for EMFs and compliance of lines with EMF restrictions and guidelines. Dr John Swanson holds the degrees of M.A. and D.Phil. in Physics at the University of Oxford. He has been a Research Officer and subsequently Scientific Advisor with the Central Electricity Generating Board and its successor companies The National Grid Company plc and National Grid Transco plc since 1989. He has been specifically involved with power-frequency electric and magnetic fields and their possible environmental and health effects. He currently holds the position of EMF Scientific Advisor to both National Grid and the Energy Networks Association. He has authored or co-authored a number of scientific papers in this area and served on a number of national and international working groups or committees. He is a Fellow of the Institute of Physics and a Chartered Physicist; a Fellow of the Institution of Engineering and Technology and a Chartered Engineer; and a Fellow of the Society for Radiological Protection and a Chartered Radiation Professional.

1.8 Reliance on ROI application

20. The SEAT Statement of Case, Page 2, Paragraph 3, sub section d states:

It is clear that the SONI application contains no original science or specific analysis, but instead falls back on all of the ROI application made by EirGrid. This needs to be borne in mind by the Department in all of its deliberations. To this end SEAT has included in the Appendices a significant number of documents from NEPPC, including its written submission in ROI, as it directly addresses many of the same statements made throughout the SONI application.

Response

21. The Consolidated ES and its Addendum present, where appropriate, the findings of assessments specifically undertaken for the proposed Tyrone–Cavan Interconnector project. The Consolidated ES and its Addendum has been produced in accordance with the 2015 NI EIA Regulations and is robust and thorough.
22. The EIA of the proposed Tyrone – Cavan Interconnector has been undertaken by a team of experts with appropriate qualifications in their fields.
23. The EIA does not “rely” upon the application made in Ireland², and of course it preceded that application. The Consolidated ES was submitted in Northern Ireland in 2013 and the EIS in Ireland was submitted in 2015. While the EirGrid application now has planning approval (consented by An Bord Pleanála on 21 December 2016), separate applications were required because of the separate jurisdictions. SONI and EirGrid (the applicants) have closely co-ordinated and cumulative and transboundary effects have been appropriately addressed. However the application in Northern Ireland is robust and self-contained.
24. The SONI submission has included submissions that were made by NEPPC for the Oral Hearing in Ireland. These points were addressed by EirGrid, the applicant in Ireland in written rebuttals and at the oral hearing. The proposed Interconnector in Ireland obtained planning approval on 21st December 2016. For information SONI has appended to the Main Rebuttal Technical Report the Order from An Bord Pleanála, the Inspector’s Report and the EirGrid Consultation Response Document.

1.9 Consultation

25. In the SEAT Statement of Case, Page 7, Paragraph 22 and pages 22-22, Paragraphs 130-143 SEAT raise the issue of whether the application process has followed the “Gunning” principles of consultation. In paragraph 132 of the SEAT submission, it is stated that:

(i) consultation must take place when the proposal is still at a formative stage;

² Also called the Republic of Ireland.

(ii) sufficient reasons must be put forward for the proposal to allow for intelligent consideration and response;

(iii) adequate time must be given for consideration and response; and,

(iv) the product of consultation must be conscientiously taken into account.

26. Paragraphs 131-143 consider these principles, however the objections raised by SEAT are largely based on EirGrid's and not SONI's approach to the consultation process.
27. In his submission Mr McNally states that "effective public consultation" has not been undertaken by SONI.
28. On page 15 of Mr Lennon's submission, points are made on the alleged lack of consultations, cancelled public events and lack of advertisements.

Response

29. In relation to the proposed Tyrone-Cavan Interconnector project SONI undertook extensive consultation between 2006 and 2016 and have involved members of the public, affected landowners, elected representatives, statutory bodies and other key stakeholders. The full details of the consultation process are set out in the Consolidated Environmental Statement, Chapter 6, Section 6.4, pages 156-173.
30. Statutory and stakeholder consultation took place to obtain baseline information and obtain comments on environmental aspects of the proposed development from 2006. This process continued through Pre-Application Discussions in 2008-9 before further consultation occurred in respect of the planning applications between 2010 and 2013.
31. Community consultation was conducted on behalf of the applicant, pre-application, through a three-phased approach from March 2007 to December 2008. These consultations were supplemented by ongoing consultation with public representatives such as MLAs and MPs.
32. In the first phase, all affected landowners were contacted in March 2007 and using land registry maps; those affected were identified and invited by letter to a meeting where details and maps of the proposed development were

available. Three separate landowner meetings were scheduled for different sections of the proposed overhead line route. As a result of the local media broadcasting a general invitation, the third meeting was cancelled, as due to the large numbers expected to attend it was not anticipated that a meaningful dialogue could take place. Individual meetings were therefore rearranged with the landowners concerned.

33. The second phase involved information packs being delivered in September 2007 to every house within a 1km corridor either side of the proposed line route. The covering letter invited attendance at an information week. A public exhibition took place between Monday 8th and Saturday 13th October 2007 at the Market Place Theatre and Arts Centre, Armagh. the applicant also met a group of concerned landowners that week, as facilitated by a local MLA.
34. The third phase of pre-application consultation took place in December 2008, which involved sending out letters and maps of the preferred route to MLAs/Councillors, landowners, those known to be living 1km either side of the route and those known to have lodged planning applications within 300m each side of the route.
35. As the Consolidated Environmental Statement records, in the context of Alternatives (Chapter 4, page 108, paragraphs 320-1):

“Consultations were also undertaken with local authorities and with statutory and other stakeholders as well as with a wide range of individuals, public representatives and other stakeholders. Where potential impacts were identified the proposed location of tower(s) was changed if possible. This entailed an extensive, ongoing and sometimes circular process of technical design, specialist assessment and consultations with landowners.

Whilst there were a number of suggestions and proposals made by individuals and consultees for minor and short-run deviations in NIE’s proposed overhead line route, NIE did not receive, at any stage in the line-routeing process, any submission or suggestion that an alternative route corridor should be considered or that there was a more desirable or

appropriate method (other than undergrounding) for delivering the proposed Interconnector”.

36. Statutory consultation with landowners and the public then took place in relation to the Environmental Statement, published in December 2009, the First Addendum, published in January 2011 and the Second Addendum, published in October 2011. Further statutory consultation took place after the 2012 adjournment of the inquiry, following the submission of the associated works application in 2013 and the Consolidated Environmental Statement in 2013 (which also addressed refinements to the proposed design); and then following the submission of an addendum to the Consolidated Environmental Statement in June 2015. Further details are provided in the Department for Infrastructure’s Statement of Case of December 2016 (Annex B)
37. It is clear therefore that extensive public consultation has taken place both in before the submission of any finalised planning application, when there was an opportunity to comment on the emerging proposals, and at every stage where relevant environmental information or changes to the overall proposals have been sought. This has involved a range of approaches:
- brochures to inform landowners and the general public in the vicinity of the project about progress with the Tyrone - Cavan Interconnector;
 - a project website where all key project materials, including reports, maps and project videos, could be accessed;
 - Information days or consultation events that were open to landowners, the public and other key stakeholders;
 - Advertisements in the local media – both those required by statutory process and those informing people of key development (e.g. upcoming information days).
 - Press releases notifying the public of project milestones and consultation events; further supported by social media;
 - Briefings and presentations with elected representatives – including information stands at various party conferences;
 - Statutory consultation on planning applications and environmental impact assessment. SONI has made the documents available to view to public

locations such as libraries or through its website, made them available to purchase in paper copy or available for free on CD/DVDs;

- Project Information Centres – since 2015, SONI has maintained an information office in Armagh and has opened a permanent office in the city since March 2016. A Mobile Consultation Unit was launched in June 2016, to engage with public and ‘hard to reach’ stakeholders.

38. It is noted that during the Stage 1 hearings of the reconvened hearing in 2016, Leading Counsel for SEAT remarked that if anything there had been excessive consultation in this case. SONI disagrees but in any event it is clear that SEAT and other interested parties have had extensive opportunities to comment on the proposed development, dating back to prior to the submission of the 2009 application, when the applicant openly invited comments on its preferred proposals at that time. Since then any member of the public interested in the scheme has been able to comment on the proposals and participate in public hearings, including the forthcoming hearing.
39. The Gunning principles themselves are not in dispute, however it is important to appreciate the context in which they were formulated. They related to a challenge by way of judicial review to a decision of a public authority, which was vitiated by the failure of the authority in question (a local education authority) to properly consult under statute those affected before it reached its decision (on school re-organisation) as a matter of public law. They apply generally to public bodies in relation to a prospective decision that that body will be taking.
40. They do not therefore apply in the present case, because when NIE, as it was, submitted its proposals in 2009 it was a private company (as owned by Viridian Group PLC and purchased by ESB in 2010). In any event, it was in the position of a developer submitting proposals for determination by a different (public) body, the Department for the Environment (now the Department for Infrastructure). It was that body on which relevant statutory consultation duties were placed, and followed, in relation to the decision in question.

41. Notwithstanding these points on the inapplicability of the Gunning principles, it is clear that SONI and its consultants have undertaken extensive consultation on the project since 2006 and in particular:
- prior to the submission of the planning application in 2009, NIE and its consultants publicly consulted upon its preferred option;
 - the information provided by NIE and its consultants explained the nature of the proposals through a variety of means; and during consultation events and meetings, SONI sought to explain how the effects of the Tyrone - Cavan Interconnector would impact the receiving environment and provide more information regarding the project need and selection of an overhead line route;
 - NIE and its consultants openly invited comments on all aspects of its emerging proposals;
 - consultation took place (in the case of public consultation from 2007), well before the submission of the planning application in 2009 and has continued in accordance with statutory requirements; and
 - NIE and its consultants took into account representations resulting from consultation before submitting its proposals in 2009;
 - NIE and now SONI have continued to explain the nature of the project, through the Environmental Statement submitted with the 2009 application and then through its addenda and the Consolidated Environmental Statement and addendum, as well as the its Statement of Case for the project (December 2016).
42. It is not therefore accepted that consultation has been inadequate. As for the specific complaint of Mr Lennon regarding cancelled public events, it is acknowledged that a landowners meeting was cancelled in 2007, however as is set out above, the meeting was rearranged and should be seen in the light of the other extensive consultation which has occurred in relation to the proposals.

1.10 Transboundary Effects and Consultation

43. In the SEAT Statement of Case, Page 24, Paragraph 144 states:

The SONI application is totally out of line with the EirGrid application in ROI. This raises serious issues in relation to transboundary considerations. Importantly for those landowners and communities living on either side of the border it is impossible for them to have an accurate analysis of what is actually planned for this interconnector project.

44. On page 5 and 6 of his submission, Mr McNally identifies concerns with the Espoo Convention and Transboundary Consultation.

Response

45. The EirGrid and SONI proposed Interconnector Joint Environmental Report 2015 (Consolidated ES Appendix 2.1) provides detail of the proposed interconnector and its key components in Northern Ireland and Ireland. The EIA Regulations require an assessment of likely transboundary impacts and this has been carried out as part of the EIA. Chapter 6 of the Consolidated ES Addendum summarises and outlines the Transboundary impacts. Each of the assessment studies detailed in the technical chapters of the Consolidated ES and its Addendum also deal with transboundary effects (where appropriate). Chapter 6 (Transboundary Impact Assessment) of the Consolidated ES Addendum specifically deals with this issue.
46. The 1991 UNECE Convention on Environmental Impact Assessment in a Transboundary Context, known as the Espoo Convention, has been ratified by both the UK and the EU and has been incorporated in amendments to the EIA Directive - Directive 97/11/EC brought the EIA Directive (85/337/EEC) in line with the Espoo Convention. Specifically, Article 7 of the EIA Directive gives effect to the Espoo Convention. The details of how to implement Article 7 are left up to the Member States. The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 1999 ("1999 EIA Regulations") apply to planning application reference O/2009/0792/F and the Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2015 apply to planning application O/2013/0214/F. Regulation 18 of the 1999 EIA Regulations and Regulation 27 of the 2015 EIA Regulations transpose the

requirements of Article 7 of the EIA Directive into domestic legislation. The Department has carried out extensive consultation in accordance with the requirements in Regulation 18 of the 1999 EIA Regulations and Regulation 27 of the 2015 EIA Regulations.

1.11 TEN-E Regulation and Consultation

47. On page 6 of his submission, Mr McNally refers to the Regulation on guidelines for trans-European energy infrastructure EU 347/2013 (TEN-E Regulation) and suggests that SONI has failed to carry out effective public participation as required by that Regulation.
48. The TEN-E Regulation lays down rules for the timely development and interoperability of energy networks in European Union Member States and the European Economic Area. It has direct application in Member States and sets out guidelines for streamlining the permitting processes for major energy infrastructure projects that contribute to trans-European energy networks. These infrastructure projects are referred to as "Projects of Common Interest" ("PCI").
49. As the Consolidated Environmental Statement explains (Chapter 2, page 13 paragraphs 40-2):

“The Regulation notes that the Commission has identified 12 strategic trans-European energy infrastructure priority corridors, the implementation of which by 2020 is essential for the achievement of the EU’s energy and climate change priorities. Under the Regulations [PCIs] will be recognised in a Union List and such projects will be given priority status at national level to ensure rapid administrative treatment. The Regulation directs that these [PCIs] should be considered by competent authorities as being in the public interest”.
50. North-South electricity interconnections in Western Europe (“NSI West Electricity”) were one of the priority electricity corridors identified in the TEN-E Regulation.

51. The addendum to the Consolidated Environmental Statement later explained (Chapter 3, page 16 paragraphs 8-9) that the proposed Interconnector was designated as a PCI in the Union List. Commission Delegated Regulation 1391/2013 included in a list of identified PCIs “2.13.1. Ireland – United Kingdom interconnection between Woodland (IE) and Turleenan (UK – Northern Ireland)”
52. The TEN-E Regulation requires PCI project promoters to undertake certain activities (see Chapter III in particular) including prescribed public participation requirements as part of the overall consent process. However for PCIs in the permit granting process for which a project promoter has submitted an application file before 16th November 2013, the provisions of Chapter III do not apply (Article 19).
53. A Manual of Procedures dated May 2014 and prepared by the UK Government sets out practical guidance on the requirements of the Regulation. It advises (at paragraph 8.2) that “those PCIs for which a formal application for one or more of the consents required for construction of the PCI was submitted before 16 November 2013 will benefit from the transitional provisions of Article 19”; and that “this exemption therefore applies to the following UK PCIs on the first Union List only: PCI 1.1.1; PCI 1.1.3; PCI 1.10; PCI 1.12; PCI 21.13.1; PCI 2.13.2” (footnote). There is no PCI 21.13.1 on the Union List and the reference to 21.13.1 is clearly a reference to the proposed Interconnector (2.13.1).
54. Therefore, whilst the Eirgrid proposals were submitted after this date, the SONI proposals which were submitted beforehand and are exempt from the specific public participation requirements of the Regulation. This was confirmed by a letter dated 3rd April 2014 from the Minister of the Environment to the Chief Executive of Armagh City and District Council, in which it was stated that the Regulations were not considered to have any implications for the SONI element of the Interconnector project, as the SONI applications were submitted prior to the Regulations. It is noted that SEAT could have judicially reviewed the Minister’s confirmation of exemption, but did not do so, and that any such challenge is now massively out of time.

55. It is not necessary therefore to consider public participation specifically pursuant to the Regulations. As explained above, however, statutory consultation in relation to the planning applications and associated environment assessment has taken place in this case.

1.12 Transboundary Ownership and Aviation

56. In the submission from Mr James McNally, points are raised with regard to Transboundary and Aviation issues:

Who is actually legally responsible for this section of the powerline in Crossbane? Soni in NI or Eirgrid in ROI? Which jurisdiction is responsible for this section of overhanging line which is positionally placed in Northern Ireland (NI)? What would happen if either a private, utility or border security helicopter comes in to contact with this section of the line endangering people in the ROI? The potential for helicopter accidents due to poor visibility in drumlin topography as a result of the erection of up to 50 metre high pylons and powerlines is a serious transboundary aviation risk that must be considered by the Planning Appeals Commission (PAC).

Response

57. The operation and maintenance of the border oversail section in the townland of Crossbane will entirely be the responsibility of NIE Networks.
58. Chapter 20 of the Consolidated ES deals with Transboundary impacts as well as Chapter 6 of the Consolidated ES Addendum. Chapter 16 of the Consolidated ES Telecommunications and Aviation Assets Section 16.3.2 Paragraph 18 Table 16.2 Telecommunications and Aviation Consultation Summary summarises the response from the Directorate of Airspace Policy:

'The overhead line and supporting structures would not constitute aviation en-route obstructions for civil aviation purposes. The Defence Geographic Agency (DGA) should be informed of the line route so that updates to aviation documentation can be initiated'.

1.13 Alleged ES Deficiencies

59. In the submission from Mr Jim Lennon, on pages 1 and 2, points are raised on alleged deficiencies in the Environmental Statement, in particularly on hedges and trees to be removed, location of temporary roads, construction compounds and 1000 square metre winching area locations. Comments

were also made on incomplete surveys and the suggested difficulty of fully understanding the impacts that may arise.

Response

60. It appears that Mr Lennon is making reference to the 2009 Environmental Statement for the project, which was superseded by the 2013 Consolidated ES. The Consolidated ES was updated to include more details on the points raised by Mr Lennon, following submissions made by third parties at the 2012 Public Inquiry.
61. The extent of hedges and trees that will be affected, location of temporary roads, construction compounds and stringing locations are described in Chapter 5 of the Consolidated ES. These areas are included with the planning application boundaries for the project and are fully assessed in the specialist chapters of the Consolidated ES and its Addendum.
62. With regard to “incomplete surveys”, SONI and its consultants have extensively surveyed the affected area for many years and the details of all the surveys are presented in the Consolidated ES, its Addendum and the supporting documents of the Statement of Case. This includes extensive bat and badger surveys.
63. The Consolidated ES and its Addendum have been undertaken by SONI, AECOM and sub-consultants. AECOM co-ordinated the production of the ES and undertook many of the specialist assessment chapters. AECOM is a founder member of the Institute of Environmental Management and Assessment (IEMA) EIA Quality Mark, which provided peer review of Environmental Statements to ensure quality and readability. This member is reviewed and audited on an annual basis by IEMA and AECOM's membership has just again been approved for 2017. The presented assessment is robust and considered to be of a high quality and is sufficient for the Department for Infrastructure to consider the likely significant effects in determine planning approval for the project. The latter has been confirmed in the recent Statement of Case for the Department (December 2016).

64. In-line with the requirements of the EIA Regulations, a Non-Technical Summary has been produced to help interpret the technical information present in the Consolidated ES and its Addendum.

1.14 Routeing Assessment

65. In the submission from Mr Jim Lennon, on page 11, it is stated that “there is not evidence presented to support the route or alternatives examined; they are neither scored nor ranked”. Reference is made to “Appendix 2”.

Response

66. It appears that Mr Lennon is making reference to the 2009 Environmental Statement for the project, which was superseded by the 2013 Consolidated ES. Mr Lennon’s reference to “Appendix 2” is likely to be to “Appendix B – Alternatives” of the 2009 ES, which has also been superseded.
67. The approach taken to the assessment of alternatives (technology, routeing and siting) is fully outlined in Chapter 4 of the Consolidated ES and Chapter 10 of the Consolidated ES Addendum. These chapters outline in detail the process that was undertaken to determine the best available design, route and location of the proposed Tyrone – Cavan Interconnector taking into account all factors. No ranking or scoring was undertaken as that quantification approach would not have allowed the same detailed consideration as was undertaken. In addition, the quantification approach of scoring would not be possible as it is not considered possible or desirable to assigning numerical value to environmental receptors. The detailed chapters outline how the chosen design and location were arrived at.

1.15 “Damage to the environment”

68. In his submission, Mr. Hughes states that he objects to the project “because of the damage it will cause environmentally to this area”.

Response

69. A robust Environmental Impact Assessment has been undertaken for the proposed Tyrone – Cavan Interconnector. The environment has been taken

into account from the outset of the project through the careful routeing and siting of the project. Environmental surveys and assessment have helped to inform the mitigation measures to eliminate or minimise as far as possible the environmental impacts. As identified in the Planning Statement of Case for the project:

“The evidence demonstrates that there are overriding national and regional reasons for the proposed Tyrone-Cavan Interconnector, as required by policy. It has also been established that there are imperative reasons of overriding public interest. The proposal benefits from widespread policy support deserving of very substantial and determining weight. When considering the site specific circumstances of the proposed Tyrone-Cavan Interconnector it is accepted that the proposed Tyrone-Cavan Interconnector produces some environmental impacts that are unavoidable. However, none are of such significance that they would either individually or cumulatively outweigh the overriding national and regional need for the proposed Tyrone-Cavan Interconnector and the benefits to be gained. The proposed Tyrone-Cavan Interconnector is clearly acceptable in planning terms.”

1.16 Conclusions

70. In conclusion, nothing in the objectors' Statements of Case and representations serves to undermine the conclusions set out in the SONI Statement of Case and supporting Technical Reports. As stated in SONI's Main Rebuttal Document, the proposed Tyrone - Cavan Interconnector remains clearly acceptable in planning terms.