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12 Socio-Economics

12.1 Executive Summary

1. Third parties have made written submissions which include objections to the proposed Tyrone-Cavan Interconnector on Socio – Economics grounds, including tourism.
2. The nature of tourism based objections are:
 - Perceived effects of the proposed Tyrone-Cavan Interconnector on visitors to the St Mochua's Holy Well and sacred site of the Church, including the future tourism development potential of the site;
 - Perceived impact of the proposed Tyrone-Cavan Interconnector in deterring visitors to visit (an undefined) geographic area;
 - Perceived transboundary visual impact of the proposed Tyrone-Cavan Interconnector on users of the Monaghan Way National Waymarked Walking Trail and whether Fáilte Ireland and the Local Authorities in the Republic of Ireland had been contacted by SONI regarding the revised planning application.
3. Detailed responses to each of the tourism based objections made are set out in Sections 12.6 - 12.9 of this Rebuttal Technical Report respectively.
4. These responses demonstrate that:
 - The positioning of the proposed Tyrone-Cavan Interconnector pylons and overhead power lines would have no significant impact on the baseline peace, tranquillity or spirituality conditions of the Holy Well and Sacred site of the Church, nor the tourism development potential of the site.
 - None of the visitor attractions and amenities around the undefined area that the Objector appears to refer to, would be physically impacted by the proposed Tyrone-Cavan Interconnector; and none of these resources would encounter significant visual impacts for visitors. In addition, there would be no significant change to the baseline visitor access, use and enjoyment of these resources once the proposed Tyrone-Cavan Interconnector becomes operational. Furthermore, none of the organisations with an interest in promoting visitors to come to the area, or

visitor attractions near where the Objector resides, have made any submissions identifying tourism issues with regards to the proposed Tyrone-Cavan Interconnector.

- Whilst it is acknowledged that the transboundary visual impact of the proposed Tyrone-Cavan Interconnector would have a significant visual effect where the Monaghan Way passes through one study area Viewpoint location (No. 31 – Crossagh Road), this would occur on an on-road section of the Monaghan Way, and would form only a very small part of the 64km long distance walking trail. When considering the entire section of the Monaghan Way that lies within the proposed Tyrone-Cavan Interconnector study area, there would be no significant transboundary visual effects on the Monaghan Way created by the proposed Tyrone-Cavan Interconnector.
- For both the proposed Tyrone-Cavan Interconnector and the North-South 400kV Interconnection Development, SONI and EirGrid co-ordinated statutory consultee consultation activities, and any relevant information was exchanged. This consultation included Fáilte Ireland, Monaghan County Council, Meath County Council and Cavan County Council. None of these bodies have raised any objections to the proposed Tyrone-Cavan Interconnector on tourism grounds.
- Both Fáilte Ireland and Monaghan County Council specifically identified the Monaghan Way in submissions related to the proposed North-South 400kV Interconnection Development. At the Oral Hearing for the proposed North-South 400kV Interconnection Development which was held in 2016 in front of An Bord Pleanála, the visual impact of that proposed project on the Monaghan Way - including the transboundary area - was a topic of discussion facilitated by the Inspector. The Inspector's conclusions and judgements on the transboundary impacts of the proposed North-South 400kV Interconnection Development are included in her Inspector's Report (VA0017 – published 21st December 2016). She accepted that significant landscape and visual effects are likely to arise in the transboundary area where the proposed North-South 400kV Interconnection Development *"is viewed at close quarters (c.600-800m) in Northern Ireland"* (Page 577). The Inspector concluded that the

transboundary impacts, likely to occur within Northern Ireland as a consequence of the proposed North-South 400kV Interconnection Development “*are confined to landscape and visual effects of the development and impacts on cultural heritage in the vicinity of Towers 102 to 110*” (Page 578).

5. The nature of other socio – economics based objections are:

- Impacts to the Willow Bioremediation Area associated with the Linwoods facility;
- Impacts to the Dandy’s Fuel Business; and,
- The perceived lack of socio – economic assessment.

6. These responses demonstrate that:

- With mitigation measures, there will be no impact to the running of the Linwoods facility. The effluent that is produced by the facility can be discharged to the remaining area of the bioremediation area (less than 1 ha out of 13 ha affected) and any excess effluent can be tankered off and reasonable compensation agreed. In this way, operations at the Linwoods facility will be unaffected.
- The Dandys Fuel Business is located 200m from the centre line and 274m SW of Tower 94. There will be no likely significant effects to the business.
- In terms of socio-economic assessment, a Socio-economics chapter is presented in the Consolidated ES (Chapter 15). A cost-benefit analysis is presented in outlined in Chapter 4 of the Consolidated ES and Chapter 10 of the Consolidated ES Addendum.

7. Our detailed responses to each of the socio-economic-based objections made are set out in Sections 12.10 - 12.12 of this Rebuttal Technical Report respectively.

12.2 About the Authors

8. The socio-economics assessment of the proposed Tyrone-Cavan Interconnector was undertaken by Fay Lagan, an Associate Director with AECOM.

9. 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.
10. Mr Lagan is supported at the Public Inquiry by Mr Ken Glass, a Principal with AECOM and an expert in tourism. Mr Glass has over 20 years' experience in Tourism projects and during his career he has also been responsible for undertaking a number of tourism, recreation and community assets impact assessments as part of EIA/ES reports for power, renewables, road, rail, and flood prevention scheme projects in the UK. Mr Glass recently was an expert witness in consideration of the Tourism & Amenity aspects of the North-South 400kV Interconnection Development proposed by EirGrid at the Oral Hearing in front of An Bord Pleanála.

12.3 Policy

11. No Policy issues have been raised in relation to socio – economics.

12.4 Guidance

12. No Guidance issues have been raised in relation to socio – economics.

12.5 Further Environmental Information for the Purposes of the Inquiry

13. It is not necessary to introduce new information to address any point made by third parties or the Department and its consultees in relation to socio – economics.

12.6 Potential Effects on Visitors to St Mochua's Holy Well and Sacred site of the Church

14. On Page 2 of Mr Tom McNally's letter (SEAT Appendix 18) he states his "*great concern*" that the St Mochua's Holy Well and Sacred site of the Church will become an area where those who need help in their lives will be afraid to visit due to the proximity of the proposed Tyrone-Cavan Interconnector. He further states that the positioning of the pylons and the OHL would not be conducive in any way to enhancing "*this place of Prayer, Quiet and Solitude*" and the surrounding area, and would hamper the tourism development potential of the site.

Response

15. St Mochua's Holy Well and Sacred Site of the Church is located directly adjacent to, and bisected by, the B3 Fergort Road between Derrynoose and Keady. It is located within 500m east of the proposed Tyrone-Cavan Interconnector which over-sails Fergort Road between Towers 94 and 95. Existing utility infrastructure (electricity poles and overhead cabling) are located running across agricultural land directly to the north of the Holy Well site and also over-sail (telephone wire) the B3 Fergort Road less than 50m north-west of the site.
16. St Mochua's (also known as the Blest Well or St Malachy's Well) was one of two Holy Wells within the study area identified in Chapter 12 of the Consolidated Environmental Statement (Volume 2, Page 399, Paragraph 59 – Ref No.69). Chapter 12 also references the Church (Volume 2, Page 397, Paragraph 45 – Ref No.70) – "*the immediate study area contains the remains of a former church and graveyard*". Both the St Mochua's Well and the former church and graveyard are heritage sites which were identified as not requiring assessment as their heritage asset value and significance, location or setting would not be affected by the construction of the proposed Tyrone-Cavan Interconnector. (Consolidated Environmental Statement (Volume 2, Chapter 12, Page 402, Paragraph 93).
17. Mr Tom McNally refers to St Mochua's as a place "*of Prayer, Quiet and Solitude*" and this is reflected on the St Mochua's Well website (www.stmochuaswell.com).

holywellderrynoose.com) where the site is described as “a *place of Healing and Peace*”. However, the location of the site directly adjacent to, and bisected by the B3 Fergort Road means that existing Holy Well visitors are already exposed to factors which potentially already impact on their feelings of peace, tranquillity and spirituality e.g. passing vehicle movements and associated noise and vibration effects. Increasing the tourism potential of the site is a stated aim in Mr Tom McNally’s letter. By implication, this would involve more visitors coming to the site, which would add to the adjacent site traffic activity and associated impacts.

18. Mr Tom McNally states his concern that some potential site visitors would be “*afraid to visit*” due to the proximity of the proposed Tyrone-Cavan Interconnector overhead power lines. However, he does not define or explain the specific factors that could raise such feelings of fear or anxiety. Both the proposed Tyrone-Cavan Interconnector Consolidated Environmental Statement (Volume 2) and the Consolidated Environmental Statement Addendum (Volume 2) have included assessments of topics which may relate to Mr Tom McNally’s concern.

Visibility of the Overhead Power Line

19. Chapter 13 of the Consolidated Environmental Statement (Volume 2, Page 459, Paragraphs 342-351) assesses the physical landscape impacts of the section of the proposed Tyrone-Cavan Interconnector between Towers 93 and 102 which includes Towers 94 and 95 which are closest to the St Mochua’s Holy Well and Sacred site of the Church. The assessment concludes that the physical landscape effect would be significant during construction and in the winter year of commissioning reducing to a not significant effect by Year 15 once replacement planting matures.
20. However, the towers closest to the Holy Well and Sacred site of the Church (Towers 94 & 95) are set within the Armagh drumlins landscape with roadside vegetation, field boundary trees and hedgerows, utility infrastructure and buildings also contained within the landscape. Screening of the towers and connecting overhead lines from the Holy Well site location, by topography and roadside vegetation, would therefore not create a significant effect for visitors to the site. Whilst the towers and overhead lines

in the wider area could potentially be visible to visitors travelling to/from the Holy Well site, visitors would be moving through a drumlin landscape where hedges and trees are common features along roadsides and field boundaries and which would contribute to restricting potential views of the proposed Tyrone-Cavan Interconnector.

21. Therefore the proposed Tyrone-Cavan Interconnector would not have a significant visual effect on visitors travelling to/from, or at, the St Mochua's Holy Well and Sacred site of the Church, where in essence, it is "the place" itself which is the visitor draw (as shown in paragraph 17 above), not the surrounding views.
22. The following information is presented to the inquiry for the purposes of the inquiry. In a recent Appeal Decision (11th April 2016) by the Planning Appeals Commission (Appeal Reference: 2014/A0089) for a proposed six turbine Wind Farm development in the townland of Cloghinarey in Co. Antrim, one of the appeal issues was the visual impact effect of the development proposal on the visual amenity of the area – including its impact on Slemish Mountain. From the southern part of the summit of Slemish Mountain there would be views looking down on the proposed wind farm which would be seen within a wide panoramic landscape. Slemish Mountain is identified in the Commissioner's Report (Appeal Decision, Page 7, Paragraph 34) as being "*an iconic visitor attraction*" with visitors including those who come for "*historic reasons including its [Slemish Mountain] associations with St Patrick*". Christian Heritage/Saint Patrick was one of five major capital Signature Projects identified by the Northern Ireland Tourist Board as having the potential to have a major impact on developing Northern Ireland's tourism performance.
23. The Commissioner further states that "*there is no doubt that Slemish Mountain has a high tourism value*", but the Commissioner concluded that she had "*not been persuaded that a significant number of visitors would be deterred from visiting Slemish Mountain and that its tourist value would be significantly compromised if the proposed wind farm proposal was in place*". She stated that "*the concerns expressed about...effects on tourism....are not determining*". Accordingly, whilst the Commissioner did not sustain the

Tourism issue appeal (Appeal Decision, Page 7, Paragraph 35), the Appeal did ultimately fail on other grounds - “*unacceptable*” landscape character and residential amenity impacts.

Noise and/or Vibration Impacts from the Overhead Power line

24. As reported in the proposed Tyrone-Cavan Interconnector Technical Report No.9 (Noise) Paragraph 128, the updated (2016) assessment of the proposed Tyrone-Cavan Interconnector noise and vibration effects has concluded that there would be no significant noise or vibration effects during either the construction or operational phases. The same Technical Report No.9 (Paragraph 118) also states that the predicted corona noise condition levels would meet both the British Standards and World Health Organisation guidelines. Therefore the proposed Tyrone-Cavan Interconnector would have no significant noise or vibration impacts for visitors to the St Mochua’s Holy Well and Sacred site of the Church.

Exposure to Electric and Magnetic Fields (EMFs)

25. Chapter 7 of the Consolidated Environmental Statement (Volume 2, page 211, Paragraph 246) reports that the proposed Tyrone-Cavan Interconnector will comply with the UK Government policy on exposure of the general public to EMFs. In addition, the proposed Tyrone-Cavan Interconnector Technical Report No.5 (EMFs) states that it complies with the public exposure limits at all places underneath the line, “*not just beyond some specified minimum distance*” (Paragraph 75).
26. In relation to the effect of EMFs on pacemakers, other active implanted medical devices and hearing aids, Page 212, Paragraph 251 states that “*These devices are almost entirely immune from any interference at the levels of EMFs produced by the overhead line, and overhead lines are not regarded as a source of interference by the relevant regulatory body, who have no record of any patient coming to harm as a result of an overhead line*”.
27. Therefore the proposed Tyrone-Cavan Interconnector would have no significant EMF impacts for visitors to the St Mochua’s Holy Well and Sacred site of the Church.

28. The responses set out above - to the summary of Mr Tom McNally's points made in paragraph 14 – demonstrate that the positioning of the proposed Tyrone-Cavan Interconnector pylons and overhead power lines would have no significant impact on the baseline peace, tranquillity or spirituality conditions of the Holy Well and Sacred site of the Church, nor the tourism development potential of the site.

12.7 Consultation with Tourism Bodies

29. On Page 2 of Mr Tom McNally's letter, it is stated that the local Holy Well committee has had consultations with NITB in relation to "*cooperative working*" on the St Patrick/Christian Heritage theme product development including a "*forthcoming*" island of Ireland East Border Region Expression of Interest (EOI) to the European Union (EU) INTERREG Atlantic Area funding programme which will include the development and linkage of pilgrimage routes.

Response

30. The submission points summarised in paragraph 29 above are narrative statements and do not raise, or identify, any specific tourism concerns in specific to the proposed Tyrone-Cavan Interconnector.
31. Christian Heritage/Saint Patrick was one of five major capital Signature Projects identified by NITB as having the potential to have a major impact on developing Northern Ireland's tourism performance. The Saint Patrick's Trail signed driving Route between Armagh city and Bangor is an integral part of the Christian Heritage/Saint Patrick Signature Project.
32. Page 2 of Mr Tom McNally's letter provides a quotation from Sara McGeary of NITB which makes reference to "*your application*" but no further information is provided about this – including when the quotation from NITB was made. In addition, Mr Tom McNally does not indicate either the timings, or the current status of, the Holy Well committee's consultations with NITB.
33. East Border Region (EBR) is a cross-border network of six local authorities (which includes Armagh city, Banbridge and Craigavon Borough Council). In seeking funding support from the EU INTERREG Atlantic Area Programme

(2014-2020), EBR proposed a thematic approach which covered a number of key strategic tourism project priorities for the region. One theme was Celtic Saints and Cultural Heritage and EBR identified the Development of Pilgrimage trails, meditation trails and/or heritage trails as potential activities as part of this Theme.

34. To address this reference to a “*forthcoming*” EBR application made in Mr Tom McNally’s submission, the following information is presented to the inquiry for the purposes of the inquiry. Following a telephone conversation on the 16th December 2016 with the EBR INTERREG IVA Programme Manager (Ms Dette Hughes), she confirmed that EBR did submit an Expression of Interest to the Atlantic Area Programme in 2016 but that the Expression of Interest had been unsuccessful. Accordingly, EBR was therefore not short-listed to make a full application submission to the European Union (EU) INTERREG Atlantic Area funding programme.
35. On Page 5 of another third party written submission from Mr James McNally, he asks if Fáilte Ireland and the Local Authorities in the Republic of Ireland had been contacted by SONI regarding the revised planning application and his contention of the “*severe negative*” transboundary impact that the application would have on the Monaghan Way.

Response

36. SONI and EirGrid have co-ordinated very closely in the approach to the Environmental Impact Assessment. This has included the approach to consultation. Prior to writing the ES/EIS for the respective proposed Tyrone-Cavan Interconnector and North South 400kV Interconnection Development, SONI and its consultants contacted the statutory consultees in Northern Ireland to collect data and any comments those bodies had on the project whilst EirGrid contacted those in the Republic of Ireland and any relevant information was exchanged. The planning authorities in both jurisdictions are responsible for consultee consultation after the submission of the ES/EIS and are responsible for the transboundary consultation. This has been undertaken by the planning authorities. Neither Fáilte Ireland nor local authorities in the Republic of Ireland have raised any objection to the proposed Tyrone-Cavan Interconnector on tourism grounds – the same

position as the Northern Ireland Tourist Board and local authorities in Northern Ireland.

37. In addition to Fáilte Ireland, Monaghan County Council, Meath County Council and Cavan County Council were all contacted during the planning application process and the preparation of the Environmental Impact Statement (EIS) for the proposed North-South 400kV Interconnection Development.
38. The Monaghan Way was specifically identified in submissions made by both Fáilte Ireland and Monaghan County Council.
39. The following information is presented to the inquiry:
 - At the proposed North-South 400kV Interconnection Development project scoping stage carried out by An Bord Pleanála in 2013, Fáilte Ireland identified the Monaghan Way as one of the main tourism assets in the proposed North-South 400kV Interconnection Development study area. In its submission letter of 24th August 2015 to An Bord Pleanála commenting on the proposed North-South 400kV Interconnection Development planning application, Fáilte Ireland highlighted a number of tourism considerations – but made no specific reference to, or specific concerns about, the potential impact of the proposed North-South 400kV Interconnection Development on any part of the Monaghan Way.
 - In its submission response to An Bord Pleanála commenting on the proposed North-South 400kV Interconnection Development planning application, Monaghan County Council contended that the proposed project would have a negative impact on the section of the Monaghan Way in the Clontibret area. This area does not form part of the proposed Tyrone-Cavan Interconnector transboundary area.
 - At the Oral Hearing for the proposed North-South 400kV Interconnection Development which was held in 2016 in front of An Bord Pleanála, the visual impact of that proposed project on the Monaghan Way - including the transboundary area - was a topic of discussion facilitated by the Inspector, and involving representation from Monaghan County Council

(Tourism and Planning officers). Fáilte Ireland did not participate, or make any further submission to, the Oral Hearing proceedings.

- The An Bord Pleanála Inspector's Report (VA0017 – published 21st December 2016) noted that significant landscape and visual effects are likely to arise in the transboundary area where the proposed North-South 400kV Interconnection Development "*is viewed at close quarters (c.600-800m) in Northern Ireland*" (Page 577). The Inspector concluded that the transboundary impacts, likely to occur within Northern Ireland as a consequence of the proposed North-South 400kV Interconnection Development "*are confined to landscape and visual effects of the development and impacts on cultural heritage in the vicinity of Towers 102 to 110*" (Page 578).

12.8 Potential Deterrence of Visitors

40. In Mr Paul Huges's letter (SEAT Appendix 18), Point Number 7 states that his land has the Ulster Canal through it and that the pylons will stop visitors coming to "*this area*".

Response

41. The 74km, nineteenth century built, Ulster Canal between Charlemont on the River Blackwater and Wattle Bridge on the River Finn is now disused following its abandonment in 1929 as reported in Chapter 12 of the Consolidated Environmental Statement (Volume 2, Page 403, Paragraph 99). Restoration and re-opening of the Ulster Canal for visitor and recreational use would create the potential for a navigable waterway link from the Shannon-Erne Waterway to Lough Neagh and connecting to the River Bann to the north Antrim Coast. Currently, the only section of the Ulster Canal which has a restoration commitment (with funding from Waterways Ireland) is a 2.5km section connecting Castle Saunderson in Co. Cavan to the Erne Basin.
42. If the full route of the Ulster Canal were to be restored, the proposed Tyrone-Cavan Interconnector would not directly affect the disused route of the Canal

and passage of boats and barrages under the overhead line would not be affected.

43. Mr Huges does not define the geographic area which he contends that the proposed Tyrone-Cavan Interconnector project will stop future visitors from coming to visit - but simply states "*this area*".
44. Chapter 15 of the Consolidated Environmental Statement (Volume 2) assessed the potential impacts of the proposed Tyrone-Cavan Interconnector on all visitor attractions, sites, amenities/trails and accommodation establishments within a 5km study area from the substation site boundary and the centreline of the overhead line. These included visitor resources around the area that Mr Huges resides such as:
 - The River Blackwater Canoe Trail where Trail users are already exposed to human impacts e.g.
 - The River is oversailed by an existing OHL (the Magherafelt to Tandragee 275kV OHL) between Moy and the Argory;
 - The River passes built-up areas such as Blackwatertown and Moy;
 - The River passes under bridges carrying traffic (Maydown Bridge, the A29 bridge at Moy, at Blackwatertown and Bond's Bridge).
 - Benburb (Priory, Castle and Valley Park);
 - Regional Cycle Route 11 (the Route section between the Argory and Benburb forms part of the 77km on-road Ulster Canal Cycle Trail between Maghery, Co. Armagh and Clones in Co. Monaghan) and National Cycle Route 91 (a Route section runs west from Armagh city and forms part of an on-road section of the Ulster Way Long Distance Walking Route);
 - The Argory; and
 - Navan Fort.

45. As reported in Chapter 15 of the Consolidated Environmental Statement (Volume 2, page 567, Paragraph 117) no tourist sites would be physically impacted by the proposed Tyrone-Cavan Interconnector, whilst the visual impacts of the proposed Tyrone-Cavan Interconnector on visitors to the resources detailed in the previous paragraph (44) are assessed as not being significant as set out in the Tyrone-Cavan Interconnector Technical Report No.14 (Socio-Economics) Paragraphs 73-76.
46. Following the proposed Tyrone-Cavan Interconnector construction, there would be no significant change to the baseline access, and the use and enjoyment of all the visitor resources detailed in paragraph 44 above.
47. Following the publication of both the Consolidated Environmental Statement (2013) and the Consolidated Environmental Statement Addendum (2015), none of the organisations with an interest in promoting visitors to come to the area, and the attractions of visitor interest around where Mr Hughes resides (e.g. Northern Ireland Tourist Board; the National Trust; Armagh City, Banbridge & Craigavon Borough Council; Mid Ulster District Council; The Order of Mary Servite Trust; Sustrans) have made any submissions identifying tourism issues with regards to the proposed Tyrone-Cavan Interconnector.

12.9 Impact on the Monaghan Way

48. On Page 5 of Mr James McNally's letter, he states that the Monaghan Way Walk "*will be highly impacted by the powerline and crossover at Crossbane*" and that the Monaghan Way brings tourists close to Lemgare Rocks affording views of the Armagh countryside and "*on a clear day*" views from Castleblaney, to Keady and in "*the far distance*" to North Monaghan to Tyrone. It is therefore the perceived visual impact of the proposed Tyrone-Cavan Interconnector on the Monaghan Way and its users that is a concern to Mr James McNally.

Response

49. The Monaghan Way is a predominantly on-road, 64km National Waymarked Walking Trail, between Clontibret and Inishkeen. Although virtually entirely located within Co. Monaghan, a small section of the Monaghan Way is

located within Co. Armagh in Northern Ireland. There are no published visitor numbers for the Monaghan Way and the proposed Tyrone-Cavan Interconnector does not over-sail the Monaghan Way. The Monaghan Way is however over-sailed by the proposed North-South 400kV Interconnection Development near Lemgare Rocks (between Towers 109 and 110) as reported in the North-South 400kV Interconnection Development EIS Volume 3C Chapter 4 (Human Beings – Tourism and Amenity), Page 14, Paragraph 52, and in Chapter 11 (Landscape), Page 43.

50. On Page 5 of his letter, Mr James McNally refers to two specific sections of the Monaghan Way as being impacted by the proposed Tyrone-Cavan Interconnector:-

“The Powerline and Crossover at Crossbane”

51. This section of the proposed Tyrone-Cavan Interconnector is located within the transboundary area (between pylons 106 and 107) as illustrated in the Consolidated Environmental Statement Addendum (Figure 3.2 Viewpoint Location Plan - Transboundary Only) and on Page 8 (Appendix 1: Crossbane Cross-Over) of Mr James McNally's letter.
52. The assessment of the transboundary visual impacts of the proposed Tyrone-Cavan Interconnector on transboundary receptors in the Republic of Ireland included the Monaghan Way and was reported in Chapter 6 of the Consolidated Environmental Statement Addendum (Page 84, Paragraphs 36-37). This assessment concluded that *“when considering the entire section of the route [the Monaghan Way] that lies within the study area [the proposed Tyrone-Cavan Interconnector]”* there would be no significant transboundary visual impacts on the Monaghan Way during either the construction or operation of the proposed Tyrone-Cavan Interconnector.
53. The Monaghan Way Passes through Viewpoint 31: Crossagh Road, which has been assessed as having a *“Moderate Adverse”* visual effect as reported in Chapter 13 of the Consolidated Environmental Statement (Page 514-515, paras 809-810) (i.e. a significant visual effect as a result of the proposed Tyrone - Cavan Interconnector). However, passing through this Viewpoint 31 location, the Monaghan Way is on-road, and forms only a very small part of

the long distance walking trail. Accordingly, the visual effect in this location affects only a very small part of the Monaghan Way walking experience.

54. Therefore, whilst the proposed Tyrone-Cavan Interconnector would be visible to users of the Monaghan Way within the transboundary section, the overall assessed transboundary visual impact when considering the entire section of the Monaghan Way that lies within the proposed Tyrone-Cavan Interconnector study area is not significant, and therefore the proposed Tyrone-Cavan Interconnector would not have *“the severe negative transboundary impact”* on the Monaghan Way that Mr James McNally contends would occur.

“Close to Lemgare Rocks”

55. Mr James McNally does not define the geographic extent of his statement that the Monaghan Way brings tourists *“close to Lemgare Rocks”*. Lemgare Rocks are located between pylons 107 and 109 as illustrated in the Consolidated Environmental Statement Addendum (Figure 3.2 Viewpoint Location Plan - Transboundary Only) and the proposed North-South 400kV Interconnection Development over-sails the Monaghan Way between Towers 109 and 110 as reported in the North-South 400kV Interconnection Development EIS Volume 3C Chapter 4 (Human Beings – Tourism and Amenity), Page 14, Paragraph 52, and in Chapter 11 (Landscape), Page 43.
56. It should also be noted that the Lemgare Rocks are located on private land and are without public access. The Monaghan Way bypasses Lemgare Rocks and associated potential long distance panoramic views. No views from this area are protected or designated in the Monaghan County Development Plan 2013-2019.
57. In considering the undefined area *“close to Lemgare Rocks”* that Mr James McNally refers to the following points are relevant:
- As already stated in Paragraphs 52 and 54 above, the assessment of the transboundary visual impacts of the proposed Tyrone-Cavan Interconnector on transboundary receptors within the Republic of Ireland included the Monaghan Way. Whilst the proposed Tyrone-Cavan Interconnector would be visible to users of the Monaghan Way within the

transboundary section, the overall assessed transboundary visual impact when considering the entire section of the Monaghan Way that lies within the proposed Tyrone-Cavan Interconnector study area is not significant.

- The area between Towers 107 and 110 is located entirely in the Republic of Ireland and does not form part of the proposed Tyrone-Cavan Interconnector planning application but formed part of the proposed North-South 400kV Interconnection Development planning application.
- Consideration of the visual effects of the proposed North-South 400kV Interconnection Development and the Monaghan Way (including the section at, and around Lemgare Rocks) were reported in the North-South 400kV Interconnection Development EIS Volume 3C Chapter 4 (Human Beings: Tourism & Amenity (Page 14, Paragraphs 52, 53, & 60) and in the North-South 400kV Interconnection Development EIS Volume 3C Chapter 11 (Landscape) Page 43.
- The following information is presented to the inquiry for the purposes of the inquiry. At the Oral Hearing for the proposed North-South 400kV Interconnection Development which was held in 2016 in front of An Bord Pleanála, the visual impact of that proposed project on the Monaghan Way - including the area around Lemgare Rocks - was a topic of discussion facilitated by the Inspector and involving representation from Monaghan County Council (Tourism and Planning officers).
- The An Bord Pleanála Inspector's Report (VA0017 – published 21st December 2016) noted that:-
 - Significant landscape and visual effects are likely to arise in the transboundary area where the proposed North-South 400kV Interconnection Development “*is viewed at close quarters (c.600-800m) in Northern Ireland*” (Page 577). The Inspector concluded that the transboundary impacts, likely to occur within Northern Ireland as a consequence of the proposed North-South 400kV Interconnection Development “*are confined to landscape and visual effects of the development and impacts on cultural heritage in the vicinity of Towers 102 to 110*” (Page 578).
 - Whilst the proposed North-South 400kV Interconnection Development had been routed away from the main tourist

attractions it would still give rise to residual landscape and visual effects for a number of visitor attractions including *“a short section of the Monaghan Way, near Lemgare, Co. Monaghan”* (Page 318). The Inspector accepted that the proposed North-South 400kV Interconnection Development *“is likely to impact on the visual amenity”* of the attractions listed (including the short section of the Monaghan Way, near Lemgare, Co. Monaghan), *“detracting from its setting or view(s) and visitor experience”* (Page 318). However, notwithstanding this, the Inspector considered that the proposed North-South 400kV Interconnection Development *“would have a very modest impact on the extent and quality of tourist attractions on offer within Cavan, Monaghan and Meath region as a whole”* (Page 319).

- Accordingly, in the undefined area *“close to Lemgare Rocks”*, it is the proposed North-South 400kV Interconnection Development – and not the proposed Tyrone-Cavan Interconnector - which is the more relevant scheme proposal when considering the significance of visual impacts on users of the Monaghan Way.

12.10 Willow Bioremediation Area

58. In the submission from Mr Fergal Woods, points are raised with regard to the Linwoods willow bioremediation area.

Response

59. The Linwoods bioremediation area was a key consideration in the routing of the proposed overhead line and in the assessment. The bioremediation area was assessed in the Consolidated ES in Chapter 8 (Water Environment), Chapter 14 (Community Amenity and Land Use) and principally in Chapter 15 (Socio-economics).
60. In routing the overhead line and selecting the location of individual towers, all engineering, economic and environmental considerations were taken into account. The extensive alternative assessment process that was completed is outlined in Chapter 4 of the Consolidated ES. The location of proposed tower and overhead line on and over the bioremediation area was selected

after careful consideration of all factors. It would not be possible to avoid the bioremediation area without relocating the proposed tower closer to residential properties in the area or other receptors such as cultural features or the Linwoods facility itself. While a significant impact to the bioremediation area has been identified, the alternative routeing and siting options would have represented more significant effects and so were ruled out.

61. Full and partial undergrounding were also considered and ruled out – see Chapter 4 of the Consolidated ES and Chapter 10 of the Consolidated ES Addendum.
62. In attempting to assess the impacts to the bioremediation area, the applicant has attempted to gain permission to survey the area in question. This was refused by the landowner – the bioremediation area is part of the 3% of land where access was refused by the relevant landowner during the course of the preparation of the Consolidated ES. The remaining 97% of the application sites in respect of which access has been granted by landowners is shown on Figure 10.1 of Volume 4 of the Consolidated ES. It is a requirement of the Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2015 (and previous iterations) that “an indication of any difficulties” encountered in preparing the EIA be included in the Environmental Statement (Schedule 4, Part 1). The denial of land access was acknowledged as a difficulty in the Consolidated ES. Additionally, the information required to fully inform the assessment of the impacts on the bioremediation area was outlined in Chapter 15 of Volume 2 of the Consolidated ES. This information includes “the nature of the effluent material, the rate of production from the facility, rate of discharge and the current condition of the treatment system” (page 566, Section 15.5 Mitigation Measures, paragraph 104).
63. Whilst land access has not been provided by the owner/ operator, it is known that the bioremediation area is operated under Consent to Discharge Effluent (No. 344/07). This Consent controls the volume of discharge per day and per hectare per year. The Consent also specifies weather conditions when there may be no discharge and specifies water quality

standards for the waterway downstream of the area. It is known from the Consent that the maximum rate of discharge is 120m³ per day over the entire 12.9 ha of the bioremediation area. The loss of land within the bioremediation area will be circa just 1 ha during construction.

64. Given the owner/operator's failure to allow land access, the Applicant now proposes as part of this application and by way of mitigation to tanker off the effluent and agree reasonable compensation with the landowner accordingly. Any entitlement of the landowner / operator to compensation will be determined in accordance with the general legal principles of compensation in Northern Ireland and in accordance with the Electricity (Northern Ireland) Order 1992 (as amended). The residual effect of the proposal to use tankers as a mitigation measure has been assessed as being of major adverse significance. This level of significance has been determined to be appropriate because of the uncertainty arising from the inability to gain access to the bioremediation area and in such circumstances it was determined that a conservative assessment should be applied.
65. With these mitigation measures, there will be no impact to the running of the Linwoods facility. The effluent that is produced by the facility can be discharged to the remaining area of the bioremediation area (less than 1 ha out of 13 ha affected) and any excess effluent can be tankered off and reasonable compensation agreed as detailed above. In this way, operations at the Linwoods facility will be unaffected.

12.11 Impacts to the Dandys Fuel Business

66. In the submission from Mr Tom McNally, points are raised with regard to potential impacts on the Dandy Fuel Business.

Response

67. The Dandys Fuel Business is located 200m from the centre line and 274m SW of Tower 94. There will be no likely significant effects to the business. The issue of potential EMF is dealt with in the Consolidated ES and its Addendum. The proposed Tyrone – Cavan Interconnector 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 Non-Ionizing Radiation Protection (ICNIRP), applied in the terms of the 1999 European Union Recommendation. These guidelines take account of all the relevant scientific evidence. The proposed overhead line complies with the public exposure limits at all places underneath it, not just beyond some specified minimum distance. A person standing directly under the overhead line would be within the exposure guidelines (Consolidated ES, Volume 2, Chapter 7 and Consolidated ES Addendum, Volume 2, Chapter 1).

12.12 “Lack of Socio-Economic Assessment”

68. In the submission from Mr Jim Lennon, on page 11, points are raised on potential socio-economics impacts and he states that “no effective, convincing or relevant socio-economic analysis has been completed”. In addition Mr Lennon states that no cost-benefit analysis was undertaken.

Response

69. In terms of socio-economics, a Socio-economics chapter is presented in the Consolidated ES (Chapter 15). A cost-benefit analysis is presented in outlined in Chapter 4 of the Consolidated ES and Chapter 10 of the Consolidated ES Addendum. The costs of an underground cable compared to an overhead line are presented.

12.13 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.