Submission from Monaghan County Council to An Bord Pleanala in accordance with Section 182A of the Planning and Development (Strategic Infrastructure) Act 2006

Regarding the proposed single circuit 400kV overhead transmission line and associated structures (Cavan-Tyrone 400kV Interconnector)

Located in the townlands of Scalkill, Ballaghnagearn, Corlea (ED Magheracloone), Greaghlone, Doagh, Cornalaragh, Raferagh, Corvally (Farney By), Ardragh, Sreenty, Ummerafree, Corrinenty, Cornasassonagh, Tullyglass, Tooa, Drumillard (Cremorne By), Aghmakerr, Boraghy, Brackly (Cremorne By), Cooltrimegish, Tullynahinnera, Greagh (Cremorne By), Drumhawan, Drumguillew Lower, Clogher, Crinkill, Cornamucklagh South, Terrygreeghan, Rausker, Cornanure (Monaghan By), Cargaghramer, Drumroosk, Lennan, Derryhallagh, (Monaghan By), Clarderry, Cornamucklagh North, Annagh (Cremorne By), Carrickanure, Cashel, Tassan, Latnakelly, Annaglogh, Lisdrumgormly, Lemgare, Coolartragh, Co. Monaghan

An Bord Pleanala Ref: 02.VA0006

Contents

1.0 Preamble

This submission is made under Section 182A(4)(b) and comprises of the technical assessment of the Planning Section of Monaghan County Council and comments by the elected members of Monaghan County Council.

2.0 Technical Assessment

2.1 Principle of Proposal

Section 69 of the Local Government Act 2001 requires a local authority to have regard to "*the policies and objectives of the Government or any Minister of the Government in so far as they may affect or relate to its functions".*

2.1.1 National Spatial Strategy (NSS)

The National Spatial Strategy (NSS) emphasises that "*a feature of the most mature and successful economies is that they possess highly developed, well integrated infrastructure that supports movement, i.e. public and private transport, and energy and communications networks*." This infrastructure converges at strategic points to drive dynamic and sustainable development.

The NSS sets out the prime considerations in terms of spatial policies relating to energy as:-

- Developing energy infrastructure on an all-island basis to the practical and mutual benefit of both the Republic and Northern Ireland.
- Strengthening energy network in the West, North West, Border and North Eastern areas in particular.
- Enhancing both the robustness and choice of energy supplies across the regions, through improvements to the national grids for electricity and gas.

2.1.2 National Development Plan 2007-2013

The National Development Plan 2007-2013 has a strong focus on value for money in public investment and seeks to ensure the most cost effective and efficient provision of infrastructure.

2.1.3 Delivering a Sustainable Energy Future for Ireland – The Energy Policy Framework 2007-2020

The White Paper sets out the Government's Energy Policy Framework 2007-2020 to deliver a sustainable energy future for Ireland. The document emphasises the fact that "*security of energy supply is crucial for the economy and society*" and that the country "*needs robust electricity networks and electricity generating capacity to ensure consistent supply to consumers and all sectors of the economy*."

The White Paper indicates that the Government's over riding policy objective is "*to ensure that energy is consistently available at competitive prices with minimal risk of supply disruption*". The Paper also states that the underpinning strategic goals are detailed as follows:

- Ensuring that electricity supply consistently meets demand
- Delivering electricity and gas to homes and businesses over efficient, reliable and secure networks
- Being prepared for energy disruptions.

The Government's White Paper emphasises that "*the availability of reliable and secure and competitively priced electricity supply must be assured at all times*" and highlights the fact that electricity "*is a vital ingredient in the competitiveness of Irish industry and Ireland's long term economic and social development*". The Government indicates that to deliver a secure and uninterrupted energy supply at a competitive cost will be underpinned by the following actions:

- Ensuring the delivery of the second North South electricity interconnector by 2011 which will more than double the existing cross border electricity transfer capacity to over 680MW

- Ensuring that the strategic network development approach is underpinned by coordinated local, regional and national approaches to issues, which balance local interests with the national imperative to deliver strategic energy infrastructure.

2.1.4 Border Regional Planning Guidelines 2004

Under Section 1.2 of the Border Regional Planning Guidelines, one of the strategic goals is "*to identify, prioritise and assist in achieving the delivery of a network of physical, social and economic infrastructure which have an inter regional dimension such as energy*."

Prime considerations relevant to the Border Region are "*the development of energy infrastructure on an all-island basis and the strengthening of energy networks in the West, North West, Border and North Eastern areas in particular*."

In addition, under Chapter 6, it is a stated objective, of the Border Regional Authority to "*Initiate the establishment of Strategic Infrastructure Corridors throughout the Region through co-operative action by the member planning authorities*."

The Regional Planning Guidelines are currently under review. In relation to energy, the issues paper published in respect to the ongoing review of these guidelines states "*The development of more sustainable, competitive, diverse and secure supplies of electricity to support economic and social development, is a key challenge for the Region. Extending the network into Northern Ireland and the UK through interconnectors will provide the Region, and the Country, with a secure and reliable electricity supply into the 21st Century."*

2.1.5 Monaghan County Development Plan 2007-2013

The County Development Plan recognises that the development of secure and reliable energy infrastructure is a key factor for maintaining and promoting growth together with attracting investment to the County. The County Development Plan under section 5.4 reiterates and affirms the policies and objectives of the National Spatial Strategy and the Border Regional Planning Guidelines.

2.1.6 Assessment and Conclusion

The objectives and policies of the National Spatial Strategy, the National Development Plan 2007-2013, the Government's Energy Policy Framework 2007-2020, the Border Regional Planning Guidelines 2004 and the Monaghan County Development Plan 2007-2013 broadly support the proposed development.

2.2 Consideration of Alternatives

Alternatives in terms of method of transmission, connection and routing were explored in the Environmental Impact Statement.

2.2.1 Transmission Alternatives

Six alternative methods of transmission were considered:-

1. Alternating Current Overhead Line
2. Alternating Current Underground Cable
3. Alternating Current Undersea
4. Direct Current Overhead Line
5. Direct Current Underground Cable
6. Direct Current Undersea

The EIS concluded on the grounds of reliability, grid integration, environmental impact and cost that Alternating Current Overhead Line was the appropriate alternative.

2.2.3 Connection Alternatives

Four cross border connection alternatives were considered:-

Option 1. Development of three additional 110kV connections between Coolkeeragh, Co. Derry and Trillick, Co. Donegal; Louth, Co. Louth and Newry, Co. Down; Tandragee, Co. Armagh and Lisdrum, Co. Monaghan

Option 2. A new 275kV or 400kV connection between Tandragee, Co. Armagh and Louth, Co.Louth following the existing north south interconnector

Option 3. A new 275kV connection between Coolkeeragh, Co. Derry and Srananagh, Co. Sligo

Option 4. A new 275kV or 400kV connection between Drumkee, Co. Tyrone and Arva, Co. Cavan

Following rejection of cross border options 1 and 3 on the grounds of insufficient transfer capacity, further consideration was given to options 2 and 4. In relation to option 2, two alternatives involving extension of the 275kV interconnection between Tandragee, Co. Armagh and Louth, Co. Louth to North Dublin were considered:-

1. Development of new 220kV line
2. Upgrading of existing Corduff - Platin and Corduff - Drybridge 110kV lines

Following further consideration of these two options, it was decided to identify a connection which would provide cross border connection and reinforce the north east grid. Concerns regarding the proximity of Option 2 to built up areas, scenic areas and heritage areas emerged. Option 4 was given preference on the grounds that it would provide a strategic link to the 220kV Louth, Co. Louth to Flagford, Co. Sligo line at a searate geographical location than the existing Louth-Tandragee interconnector. In relation to option 4, two alternatives for a cross border connection between Tyrone and Cavan were considered:-

1. New circuit between Drumkee, Co. Tyrone and Arva, Co. Cavan
2. New circuit between Drumkee, Co. Tyrone and Kingscourt, Co. Cavan

A connection between Drumkee, Co. Tyrone and Kingscourt, Co. Cavan was given preference on the grounds of it being a shorter route than the Drumkee to Arva route and avoided scenic areas.

2.2.3 Route Alternatives

Following selection by Eirgrid of a new connection between Drumkee, Co. Tyrone and Kingscourt, Co. Cavan three alternative routes were identified through County Monaghan:-

Corridor A – traverses areas of Magheracloone, Raferagh, Corduff, Shantonagh, Lough Egish, Doohamlet, Cremartin, Annyalla and Clontibret

Corridor B – traverses areas of Magheracloone, Lisdoonan, Laragh, Lough Egish, Castleblayney, Annyalla and Clontibret

Corridor C – traverses areas of Magheracloone, Lisdoonan, Donaghmoyne, Cullaville, Lough Muckno,

Corridor A was identified by Eirgrid as the preferred route on the grounds that it avoided designated sites of bio diversity and scenic routes in the county, and as it had lower proximity levels to dwellings. Eirgrid stated that the preferred route corridor struck the best balance between the often competing priorities of community concerns, environmental issues and the technical aspects of the projects.

2.2.4 Conclusion

It is considered that there is limited information in the Environmental Impact Statement (EIS) to justify the interconnector being taken through County Monaghan.

2.3 Impact upon Landscape Heritage

2.3.1 County Development Plan Policies

In relation to landscape the County Development Plan states "*The unique character of the Monaghan landscape is its intimate quality with drumlins, interspersed with lakes, trees and woodlands. This landscape of small enclosed fields with foreshortened horizons is different and indeed unique from that of the more open landscape found in many other parts of Ireland. It is a landscape that has evolved over the centuries and has traditionally been moulded and protected by agricultural practices*."

There are three principal policies relating to landscape in the Monaghan County Development Plan 2007-2013 relevant to the proposed development:-

ENV 1 - Prepare a County Landscape Character Assessment in accordance with the requirements of Landscape and Landscape Assessment Consultation Draft Guidelines for Planning Authorities, DOELG, June 2000.

ENV 2 - Protect the landscapes and natural environments of the county by ensuring that any new developments in designated sensitive rural landscapes do not detrimentally impact on the character, integrity, distinctiveness or scenic value of the area.

ENV 3 - Sustain, conserve, manage and enhance the landscape diversity, character and quality of the County for the benefits of current and future generations.

2.3.2 Landscape Character Assessment

Policy ENV1 of the Monaghan County Development Plan 2007-2013 required that a County Landscape Character Assessment be carried out, and in June 2008 the County Monaghan Landscape Character Assessment was adopted by the Council. This document contains a thorough assessment of the character of Monaghan's landscapes to provide the basis for policy formulation and informed decision-making regarding landscape management in the County.

All landscapes within the county were assessed and characterised. Fourteen Landscape Character Types (LCTs), which are categories of distinct types of landscape were identified in the assessment. The Assessment also identified nine Landscape Character Areas (LCAs), which are geographically specific parcels of landscape that share generic characteristics with other areas of the same type but which have characteristics unique to the area.

The route of the proposed overhead line passes through five LCTs:-
No. 3 – Drumlin Foothills
No. 4 – Farmed Foothills
No. 5 – Farmed Loughlands
No. 12 – Upland Farmland with Rock Outcrops
No. 13 – Upland Plateau

The County Monaghan Landscape Character Assessment only makes specific reference to over head power lines in relation to Upland Farmland with Rock Outcrops by stating "*Transmission masts and other antennae although not currently obvious in this area represent a force for change that could affect this landscape in the future."* Towers 69 to 71 are located within Upland Farmland with Rock Outcrops LCT.

The route of the proposed overhead line also passes through four LCAs:-
No. 5 - Monaghan Drumlin Uplands
No. 6 - Mullyash Uplands
No. 7 - Ballybay Castleblayney Lakelands
No. 8 - Drumlin and Upland Farmland of South Monaghan

In relation to Monaghan Drumlin Uplands the County Monaghan Landscape Character Assessment states "*Most of this landscape is in good condition. The summit or highest point along the ridgeline is likely to be highly sensitive to development because it is visually exposed for many kilometres. In general, this landscape would not be regarded as highly scenic and hence, the capacity to accommodate development without undue compromise to the farmed landscape pattern is good*." It also states "*Summit locations that afford panoramic views are deserving of special treatment in terms of restricting development*." It specifies that "*The summit of the ridgeline must be avoided as the negative visual impact of tall structures viewed on a hilltop against the skyline is substantially greater. Further downslope, these structures may be camouflaged against the backdrop of the landscape pattern and even judiciously placed wooded clumps*." Towers 93 to 100 are located within Monaghan Drumlin Uplands LCA.

In relation to Mullyash Uplands the County Monaghan Landscape Character Assessment states "*The upland flat areas together with the summit of Mullyash Mountain are highly sensitive to development owing to both their scenic quality and visual exposure*." It also states "*The upland flat areas of this landscape would be sensitive to most forms of development owing to the extent of visual exposure. These areas together with the summit of Mullyash should be avoided for any form of large scale development or indeed tall structures*." Towers 101 to 125 are located within Mullyash Uplands LCA

In relation to Ballybay Castleblayney Lakelands the County Monaghan Landscape Character Assessment states "*This is a highly scenic landscape. The farmland is generally in very good condition and the variable drumlin topography and inter drumlin hollows is a key contributing factor to character and high scenic quality. The lough and lough shore landscape settings comprising reeds and riparian vegetation are highly scenic and ecologically valuable. These would be highly sensitive to any form of development."* It asserts *"The lake and lakeshore habitats specifically ought to be protected from almost all forms of development. The visual catchment or geographic areas around each lake from which the lake and associated wetland can be seen would be regarded as highly sensitive to development. Further development on the immediate lakeshore is not recommended. Tall structures will be difficult to site in this 'almost valley' like landscape as these will be visible over a long range*." Towers 87 to 92 are located within Ballybay Castleblayney Lakelands LCA.

In relation to Drumlin and Upland Farmland of South Monaghan the County Monaghan Landscape Character Assessment states "*The lakes and lake environs in particular have a high scenic quality and carry statutory designations and are judged to be highly sensitive to any development changes. In terms of the higher rocky remote landscapes, these would be highly sensitive to any changes involving large developments or tall structures. The relative exposure and scarcity of vegetation is such that sizable developments cannot be easily accommodated here without generating negative visual impacts albeit this area is in somewhat poor condition in terms of quality*." Towers 22 to 86 are located within Drumlin and Upland Farmland of South Monaghan LCA.

In Chapter 5 "Forces for Change" the Landscape Character Assessment specifically refers to the potential impact of electricity transmission lines. It states that potential for future changes to the County's landscape could be derived from High Voltage Power Lines. It asserts "*The future upgrades of the National Transmission Network have the potential to significantly affect the physical landscape of Co. Monaghan which the County Development Plan seeks to protect. Every effort should be made to ensure that any future developments in this area, do not have a negative impact on our drumlin landscape, the built environment or the quality of life or our people.*"

2.3.3 Assessment

Many of the towers are positioned on top of or near to the crown of drumlins and the line also traverses significant ridges. This has an obvious consequence in relation to the prominence of the proposed development over long range views. It also has the effect of increasing the dominance of the proposed structures in the landscape over short term views.

The assessment of the proposed development is structured using the following criteria:-

Sensitivity of Landscape	
Low	An area of landscape where its character, existing land use, pattern and scale are tolerant of the type of change envisaged and has the capacity to accommodate change.
Moderate	An area of landscape where its character, existing land use, pattern and scale may have the capacity to accommodate the change envisaged.
High	An area of landscape where its character, existing land use, pattern and scale has low capacity to accommodate the change envisaged.

Significance of visual impact	
Minor	Minor changes in views such as at long distances, or visible for a short duration, perhaps at an oblique angle, or which blends to an extent with the existing view
Moderate	Clearly perceptible changes in views such as at intermediate distances, resulting in either a distinct new element in the view, or a more wide ranging, less concentrate change across a wider area.
Major	Major changes in views such as at close distances, affecting a substantial part of the view, continuously visible for a long duration, or obstructing a substantial part or important elements of a view

The table in the following pages illustrates the location of each tower in relation to the Landscape Character Types and Landscape Character Areas within the county, the relevant comments in the Landscape Character Assessment, the sensitivity of the landscape at each location, the significance of the visual impact, and also the detailed consideration in relation to the positioning of the towers.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
22	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	33.2m high tower located in Co. Cavan on mid slope of a drumlin with line crossing a regional road into Co. Monaghan to tower 23 located on upper slope of a drumlin. EIS has failed to demonstrate why tower 22 could not be relocated to the lower slope of the drumlin to lessen visual impact of it and the line.
23	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	42m high tower located on upper slope of a drumlin with line crossing a local road and crest to tower 24 located on upper slope of a drumlin. EIS has failed to demonstrate why tower 23 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
24	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	36m high tower located on upper slope of a drumlin with line crossing a local road to tower 25 located on upper slope of a drumlin. EIS has failed to demonstrate why tower 24 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
25	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	42m high tower located on upper slope of a drumlin with line crossing crest to tower 26 located on mid slope of a drumlin. EIS has failed to demonstrate why tower 25 could not be relocated to the lower slope of the drumlin to lessen visual impact of it and the line.
26	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	33.2m high tower located on mid slope of a drumlin with line crossing a local road and Corlea Bog to tower 27 located on upper slope of a drumlin. EIS has failed to demonstrate why tower 26 could not be directed away from Corlea Bog and relocated to the lower slopes of the drumlin line to lessen visual impact of it and the line.
27	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	31m high tower located on upper slope of a drumlin with line crossing to tower 28 located in locally lowlying area. EIS has failed to demonstrate why tower 27 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
28	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	34m high tower located in locally lowlying area with line crossing local road to tower 29 located on upper slope of a drumlin.
29	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	34.2m high tower located on upper slope of a drumlin with line crossing to tower 30 located on lower slope of drumlin. EIS has failed to demonstrate why tower 29 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
30	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	40m high tower located on lower slope of a drumlin with line crossing to tower 31 located on upper slope of drumlin.
31	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	36m high tower located on upper slope of a drumlin with line crossing drumlin to tower 32 located mid slope of drumlin. EIS has failed to demonstrate why tower 31 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
32	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	40m high tower located mid slope of a drumlin with line crossing two local roads to tower 33 located on ridge. EIS has failed to demonstrate why tower 32 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
33	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	34m high tower located on upper slope of a drumlin with line crossing ridge to tower 34 located on upper slope of a drumlin. EIS has failed to demonstrate why tower 33 could not be relocated to the lower slope of the drumlin to lessen visual impact of it and the line.
34	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	42m high tower located on upper slope of a drumlin close to wetlands with line crossing to tower 35 located on upper slope of a drumlin. EIS has failed to demonstrate why tower 34 could not be directed away from wetlands and relocated to the lower slope of the drumlin to lessen visual impact of it and the line.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
35	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	33.2m high tower located on upper slope of a drumlin with line crossing a local road to tower 36 located on falling ground. EIS has failed to demonstrate why tower 35 could not be relocated to the lower slope of the drumlin to lessen visual impact of it and the line.
36	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Moderate	36m high tower located on falling ground with line crossing to tower 37 located on falling ground.
37	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	42m high tower located on falling ground with line crossing drumlin to tower 38 located on upper slope of drumlin.
38	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	42m high tower located on upper slope of drumlin with line crossing regional road and passing Corvally Lough to tower 39 located on upper slope of drumlin. EIS has failed to demonstrate why tower 38 could not be directed away from Corvally Lough and relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
39	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	28m high tower located on upper slope of drumlin with line crossing local road to tower 40 located on lower slope of large ridge. EIS has failed to demonstrate why tower 39 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
40	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	38m high tower located on lower slope of large ridge with line crossing local road to tower 41 located mid slope of large ridge.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
41	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	36m high tower located mid slope of large ridge with line crossing to tower 42 located on upper slope of large ridge. EIS has failed to demonstrate why tower 41 could not be relocated to the lower slopes of the ridge to lessen visual impact of it and the line.
42	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	38m high tower located on upper slope of large ridge with line crossing ridge to tower 43 located on upper slope of large ridge. EIS has failed to demonstrate why tower 42 could not be relocated to the lower slopes of the ridge to lessen visual impact of it and the line.
43	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	36m high tower located on upper slope of large ridge with line crossing smaller ridge to tower 43 located on upper slope of large ridge. EIS has failed to demonstrate why tower 43 could not be relocated to the lower slopes of the ridge to lessen visual impact of it and the line.
44	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	27.2m high tower located on upper slope of ridge with line crossing ridge and local road to tower 45 located mid slope of a drumlin. EIS has failed to demonstrate why tower 44 could not be relocated to the lower slopes of the ridge to lessen visual impact of it and the line.
45	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	43m high tower located mid slope of a drumlin with line crossing ridge to tower 46 located on upper slope of ridge. EIS has failed to demonstrate why tower 45 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
46	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	34.2m high tower located on upper slope of ridge with line crossing valley and local road to tower 47 located on upper slope of a drumlin. EIS has failed to demonstrate why tower 46 could not be relocated to the lower slopes of the ridge to lessen visual impact of it and the line.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
47	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	43m high tower located on upper slope of a drumlin with line crossing ridge to tower 48 located in locally lowlying area. EIS has failed to demonstrate why tower 47 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
48	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	34.2m high tower located in locally lowlying area with line crossing local road to tower 49 located on elevated plateau.
49	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	41m high tower located on elevated plateau with line crossing ridge to tower 50 located on upper slope of a ridge. EIS has failed to demonstrate why tower 49 could not be relocated away from the plateau to lessen visual impact of it and the line.
50	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	41m high tower located on upper slope of a ridge with line crossing local road to tower 51 located on relatively flat open ground. EIS has failed to demonstrate why tower 50 could not be relocated to the lower slopes of the ridge to lessen visual impact of it and the line.
51	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Moderate	34.2m high tower located on relatively flat open ground with line crossing existing 110kV Louth-Shankill line to tower 52 located on upper slope of a drumlin.
52	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	28m high tower located on upper slope of a drumlin with line crossing local road to tower 53 located on falling ground. EIS has failed to demonstrate why tower 52 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
53	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Moderate	38m high tower located on falling ground with line crossing to tower 54 located mid slope of a drumlin. EIS has failed to demonstrate why tower 53 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
54	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Moderate	40m high tower located mid slope of a drumlin with line crossing local road to tower 55 located on upper slope of a drumlin. EIS has failed to demonstrate why tower 54 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
55	Farmed Loughlands	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	31.2m high tower located on upper slope of a drumlin with line passing by Bocks Lough to tower 56 located on upper slope of a drumlin. EIS has failed to demonstrate why tower 54 could not be directed away from Bocks Lough and relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
56	Farmed Loughlands	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	38m high tower located on upper slope of a drumlin with line crossing local road to tower 57 located on upper slope of a drumlin. EIS has failed to demonstrate why tower 56 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
57	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	40m high tower located on upper slope of a drumlin with line passing a scenic route and Historic Designed Garden to tower 58 located on upper slope of drumlin. EIS has failed to demonstrate why tower 57 could not be directed away from the scenic route and Historic Designed Garden and relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
58	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	40m high tower located on upper slope of a drumlin with line passing a scenic route and Historic Designed Garden to tower 59 located on lower slope of drumlin. EIS has failed to demonstrate why tower 58 could not be directed away from the scenic route and Historic Designed Garden and relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
59	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	40m high tower located on lower slope of a drumlin with line passing a scenic route and Historic Designed Garden to tower 60 located on upper slope of drumlin. EIS has failed to demonstrate why tower 59 could not be directed away from the scenic route and Historic Designed Garden and relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
60	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	34m high tower located on upper slope of a drumlin close to a scenic route and a Historic Designed Garden and with line crossing to tower 61 located on lower slope of drumlin. EIS has failed to demonstrate why tower 60 could not be directed away from the scenic route and Historic Designed Garden and relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
61	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	36m high tower located on lower slope of a drumlin with line crossing regional road to tower 62 located on lower slope of drumlin. EIS has failed to demonstrate why tower 61 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
62	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	29.2m high tower located on lower slope of a drumlin with line crossing a ridge to tower 63 located on upper slope of the ridge. EIS has failed to demonstrate why tower 62 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
63	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	42m high tower located on upper slope of a ridge with line crossing a ridge to tower 64 located on upper slope of a ridge. EIS has failed to demonstrate why tower 63 could not be relocated to the lower slopes of the ridge to lessen visual impact of it and the line.
64	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	36m high tower located on upper slope of a ridge with line passing Lough Morne and crossing a drumlin to tower 65 located on upper slope of the drumlin. EIS has failed to demonstrate why tower 64 could not be directed away from Lough Morne and relocated to the lower slopes of the ridge to lessen visual impact of it and the line.
65	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	27.2m high tower located on upper slope of a ridge close to Lough Morne with line crossing a local road to tower 66 located on upper slope of the drumlin. EIS has failed to demonstrate why tower 65 could not be directed away from Lough Morne and relocated to the lower slopes of the ridge to lessen visual impact of it and the line.
66	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	37m high tower located on upper slope of a ridge with line crossing a drumlin to tower 67 located on upper slope of the drumlin. EIS has failed to demonstrate why tower 66 could not be relocated to the lower slopes of the ridge to lessen visual impact of it and the line.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
67	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	42m high tower located on lower slope of drumlin with line crossing a regional road to tower 68 located on locally low lying ground.
68	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	38m high tower located on locally low lying ground with line crossing to tower 69 located on mid slope of a drumlin.
69	Upland Farmland with Rock Outcrops	Drumlin and Upland Farmland of South Monaghan	Transmission masts could affect this landscape. Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	40m high tower located on mid slope of a drumlin with line crossing to tower 70 located on elevated open ground. EIS has failed to demonstrate why tower 69 could not be relocated to the lower slopes of the ridge to lessen visual impact of it and the line.
70	Upland Farmland with Rock Outcrops	Drumlin and Upland Farmland of South Monaghan	Transmission masts could affect this landscape. Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	34.2m high tower located on elevated open ground with line crossing to tower 71 located on flat open ground. EIS has failed to demonstrate why tower 70 could not be relocated away from open and elevated landscape to lessen visual impact of it and the line.
71	Upland Farmland with Rock Outcrops	Drumlin and Upland Farmland of South Monaghan	Transmission masts could affect this landscape. Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	38m high tower located on elevated open ground with line crossing to tower 72 located on flat open ground. EIS has failed to demonstrate why tower 71 could not be relocated away from open and elevated landscape to lessen visual impact of it and the line.
72	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	33m high tower located on elevated open ground with line crossing to tower 73 located on flat open ground. EIS has failed to demonstrate why tower 72 could not be relocated away from open and elevated landscape to lessen visual impact of it and the line.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
73	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	40m high tower located on elevated open ground with line crossing local road to tower 74 located on flat open ground. EIS has failed to demonstrate why tower 73 could not be relocated away from open and elevated landscape to lessen visual impact of it and the line.
74	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	41m high tower located on elevated open ground with line crossing a ridge to tower 75 located on upper slope of ridge. EIS has failed to demonstrate why tower 74 could not be relocated away from open and elevated landscape to lessen visual impact of it and the line.
75	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	40m high tower located on upper slope of ridge with line crossing to tower 76 located on falling ground. EIS has failed to demonstrate why tower 75 could not be relocated to the lower slopes of the ridge to lessen visual impact of it and the line.
76	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	33.2m high tower located on falling ground with line crossing to tower 77 located on falling ground.
77	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	42m high tower located on falling ground with line crossing to tower 78 located on lower slopes of a drumlin.
78	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Moderate	42m high tower located on falling ground with line crossing to tower 79 located on mid slope of a drumlin.
79	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	42m high tower located on mid slope of a drumlin with line crossing to tower 80 located on mid slope of a drumlin. EIS has failed to demonstrate why tower 79 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
80	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	43m high tower located mid slope of a drumlin with line crossing to tower 81 located on upper slope of a drumlin. EIS has failed to demonstrate why tower 80 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
81	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	34.2m high tower located on upper slope of a drumlin with line crossing to tower 82 located on relatively low lying ground. EIS has failed to demonstrate why tower 79 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
82	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	42m high tower located on relatively low lying ground close to Crinkill or Toome Lough with line crossing to tower 83 located on upper slope of a drumlin. EIS has failed to demonstrate why tower 82 could not be directed away from Crinkill or Toome Lough to lessen visual impact of it and the line.
83	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	40m high tower located on upper slope of a drumlin close to Crinkill or Toome Lough with line crossing to tower 84 located on lower slope of a drumlin. EIS has failed to demonstrate why tower 83 could not be directed away from Crinkill or Toome Lough and relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
84	Drumlin Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	40m high tower located on lower slope of a drumlin close to Crinkill or Toome Lough with line crossing to tower 85 located on upper slope of a drumlin. EIS has failed to demonstrate why tower 84 could not be directed away from Crinkill or Toome Lough and relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
85	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	High	Major	43m high tower located on upper slope of a drumlin with line crossing over drumlin to tower 86 located mid slope of a drumlin. EIS has failed to demonstrate why tower 85 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
86	Farmed Foothills	Drumlin and Upland Farmland of South Monaghan	Higher rocky parts of this landscape are highly sensitive to any changes involving tall structures.	Moderate	Major	43m high tower located on mid slope of a drumlin with line crossing a local road to tower 87 located on relatively low lying ground. EIS has failed to demonstrate why tower 86 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
87	Farmed Foothills	Ballybay Castleblayney Lakelands	Variable drumlin topography and inter drumlin hollows of high scenic quality. Tall structures would be visible over long ranges. Lough and lough shore landscape settings highly sensitive to development. Further development on lakeshore is not recommended.	High	Major	34.2m high tower located on relatively low lying ground with line crossing a regional road to tower 88 located on upper slope of a drumlin.
88	Farmed Foothills	Ballybay Castleblayney Lakelands	Variable drumlin topography and inter drumlin hollows of high scenic quality. Tall structures would be visible over long ranges. Lough and lough shore landscape settings highly sensitive to development. Further development on lakeshore is not recommended.	High	Major	43m high tower located on upper slope of a drumlin with line crossing to tower 89 located mid slope of a drumlin. EIS has failed to demonstrate why tower 88 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
89	Farmed Foothills	Ballybay Castleblayney Lakelands	Variable drumlin topography and inter drumlin hollows of high scenic quality. Tall structures would be visible over long ranges. Lough and lough shore landscape settings highly sensitive to development. Further development on lakeshore is not recommended.	High	Major	43m high tower located on mid slope of a drumlin with line crossing a former rail line to tower 90 located on top of a drumlin. EIS has failed to demonstrate why tower 89 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
90	Farmed Loughlands	Ballybay Castleblayney Lakelands	Variable drumlin topography and inter drumlin hollows of high scenic quality. Tall structures would be visible over long ranges. Lough and lough shore landscape settings highly sensitive to development. Further development on lakeshore is not recommended.	High	Major	28m high tower located on top of a drumlin with line crossing to tower 91 located on locally low lying ground. EIS has failed to demonstrate why tower 90 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
91	Farmed Loughlands	Ballybay Castleblayney Lakelands	Variable drumlin topography and inter drumlin hollows of high scenic quality. Tall structures would be visible over long ranges. Lough and lough shore landscape settings highly sensitive to development. Further development on lakeshore is not recommended.	Moderate	Major	41m high tower located on locally low lying ground with line crossing to tower 92 located on top of a drumlin.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
92	Farmed Loughlands	Ballybay Castleblayney Lakelands	Variable drumlin topography and inter drumlin hollows of high scenic quality. Tall structures would be visible over long ranges. Lough and lough shore landscape settings highly sensitive to development. Further development on lakeshore is not recommended.	High	Major	36m high tower located on top of a drumlin with line crossing a local road to tower 93 located on relatively low lying ground. EIS has failed to demonstrate why tower 92 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
93	Drumlin Foothills	Monaghan Drumlin Uplands	Summit or highest point along the ridgeline visually exposed and likely to be highly sensitive to development, particularly tall structures	High	Major	33.2m high tower located on relatively low lying ground with line crossing to tower 94 located on relatively low lying ground.
94	Drumlin Foothills	Monaghan Drumlin Uplands	Summit or highest point along the ridgeline visually exposed and likely to be highly sensitive to development, particularly tall structures	Moderate	Moderate	41m high tower located on relatively low lying ground with line crossing to tower 95 located on mid slope of a drumlin.
95	Drumlin Foothills	Monaghan Drumlin Uplands	Summit or highest point along the ridgeline visually exposed and likely to be highly sensitive to development, particularly tall structures	High	Major	28m high tower located on mid slope of a drumlin with line crossing to tower 96 located on upper slope of a drumlin. EIS has failed to demonstrate why tower 95 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
96	Drumlin Foothills	Monaghan Drumlin Uplands	Summit or highest point along the ridgeline visually exposed and likely to be highly sensitive to development, particularly tall structures	High	Major	34m high tower located on upper slope of a drumlin with line crossing to tower 97 located on lower slope of a drumlin. EIS has failed to demonstrate why tower 96 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
97	Drumlin Foothills	Monaghan Drumlin Uplands	Summit or highest point along the ridgeline visually exposed and likely to be highly sensitive to development, particularly tall structures	High	Major	34.2m high tower located on lower slope of a drumlin with line crossing a local road to tower 98 located on lower slope of a drumlin.
98	Drumlin Foothills	Monaghan Drumlin Uplands	Summit or highest point along the ridgeline visually exposed and likely to be highly sensitive to development, particularly tall structures	High	Major	43m high tower located on lower slope of a drumlin close to Ghost Lough, Drumgristin Lough and Coogan's Lough with line crossing existing 110kV Lisdrum-Louth line to tower 99 located on locally low lying ground. EIS has failed to demonstrate why tower 98 could not be directed away from Ghost Lough, Drumgristin Lough and Coogan's Lough to lessen visual impact of it and the line.
99	Drumlin Foothills	Monaghan Drumlin Uplands	Summit or highest point along the ridgeline visually exposed and likely to be highly sensitive to development, particularly tall structures	High	Major	34.2m high tower located locally low lying ground close to Ghost Lough, Drumgristin Lough and Coogan's Lough with line crossing to tower 100 located on small drumlin. EIS has failed to demonstrate why tower 99 could not be directed away from Ghost Lough, Drumgristin Lough and Coogan's Lough to lessen visual impact of it and the line.
100	Drumlin Foothills	Monaghan Drumlin Uplands	Summit or highest point along the ridgeline visually exposed and likely to be highly sensitive to development, particularly tall structures	High	Major	38m high tower located on small drumlin close to Ghost Lough, Drumgristin Lough and Coogan's Lough with line crossing to tower 101 located on locally low lying ground. EIS has failed to demonstrate why tower 100 could not be directed away from Ghost Lough, Drumgristin Lough and Coogan's Lough to lessen visual impact of it and the line.
101	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	38m high tower located on locally low lying ground close to Clarderry Bog with line crossing to tower 102 located on upper slope of a drumlin. EIS has failed to demonstrate why tower 101 could not be directed away from Clarderry Bog to lessen the impact of it and the line upon Clarderry Bog.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
102	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	32m high tower located on upper slope of a drumlin with line crossing a local road to tower 103 located on locally low lying ground. EIS has failed to demonstrate why tower 102 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
103	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	31.2m high tower located on locally low lying ground with line crossing to tower 104 located on upper slope of a drumlin .
104	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	31m high tower located on upper slope of a drumlin with line crossing a local road to tower 105 located on relatively flat ground. EIS has failed to demonstrate why tower 104 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
105	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	42m high tower located on mid slope of a ridge with line crossing a ridge to tower 106 located on mid slope of a ridge. EIS has failed to demonstrate why tower 105 could not be relocated to the lower slopes of the ridge to lessen visual impact of it and the line.
106	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	42m high tower located on mid slope of a ridge with line crossing a ridge and N2 to tower 107 located on relatively flat ground close to N2. EIS has failed to demonstrate why tower 106 could not be relocated to the lower slopes of the ridge to lessen visual impact of it and the line.
107	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	36m high tower located on relatively flat ground close to N2 with line crossing former N2 to tower 108 located on the upper slope of a ridge close to N2. EIS has failed to demonstrate why tower 107 could not be relocated away from the N2 to lessen visual impact of it and the line.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
108	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	38m high tower located the upper slope of a ridge close to N2 with line crossing the ridge to tower 109 located in Cashel Bog. EIS has failed to demonstrate why tower 108 could not be relocated to the lower slope of the ridge to lessen visual impact of it and the line.
109	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	36m high tower located in Cashel Bog with line crossing to tower 110 located in Cashel Bog. EIS has failed to demonstrate why tower 109 could not be directed away from Cashel Bog to lessen the impact of it and the line upon Cashel Bog.
110	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	34m high tower located in Cashel Bog close to Lough Nahinch and Lough Tassan with line crossing to tower 111 located on edge of Cashel Bog. EIS has failed to demonstrate why tower 110 could not be directed away from Cashel Bog, Lough Nahinch and Lough Tassan to lessen the impact of it and the line upon Cashel Bog, Lough Nahinch and Lough Tassan.
111	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	40m high tower located on edge of Cashel Bog close to Lough Nahinch and Lough Tassan with line crossing a local road to tower 112 located along a ridge. EIS has failed to demonstrate why tower 111 could not be directed away from Cashel Bog, Lough Nahinch and Lough Tassan to lessen the impact of it and the line upon Cashel Bog, Lough Nahinch and Lough Tassan.
112	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	42m high tower located along a ridge close to Lough Nahinch and Lough Tassan with line crossing a small ridge to tower 113 located on lower slope of a ridge. EIS has failed to demonstrate why tower 112 could not be relocated away from Lough Nahinch and Lough Tassan to the lower slopes of the ridge to lessen visual impact of it and the line upon Lough Nahinch and Lough Tassan

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
113	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Moderate	42m high tower located on lower slope of a ridge with line crossing a ridge to tower 114 located on upper slope of the ridge.
114	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	43m high tower located mid slope of a ridge with line crossing to tower 115 located on top of a drumlin. EIS has failed to demonstrate why tower 114 could not be relocated to the lower slopes of the ridge to lessen visual impact of it and the line.
115	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	29.2m high tower located on top of a drumlin with line crossing to tower 116 located on lower slope of the drumlin. EIS has failed to demonstrate why tower 115 could not be relocated to the lower slopes of the drumlin to lessen visual impact of it and the line.
116	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	38 high tower located on lower slope of a drumlin with line crossing to tower 117 located close to a local road.
117	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	36m high tower located close to a local road with line crossing to tower 118 located on top of a drumlin. EIS has failed to demonstrate why tower 117 could not be relocated away from the local road to lessen visual impact of it and the line.
118	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	32.2m high tower located on top of a drumlin with line crossing Monaghan Way to tower 119 located on elevated ground on Lemgare Rocks. EIS has failed to demonstrate why tower 118 could not be relocated away from Lemgare Rocks and Monaghan Way to lessen visual impact of it and the line upon Lemgare Rocks, the Monaghan Way and the landscape.
119	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	37m high tower located on elevated ground on Lemgare Rocks with line crossing to tower 120 located on falling ground on Lemgare Rocks. EIS has failed to demonstrate why tower 119 could not be relocated away from Lemgare Rocks to lessen visual impact of it and the line upon Lemgare Rocks and the landscape.

Tower No.	Landscape Character Type	Landscape Character Area	Relevant Comments in Landscape Character Assessment	Sensitivity of Local Landscape	Significance of Visual Impact	Consideration
120	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Major	38m high tower located on falling ground on Lemgare Rocks with line crossing a local road to tower 121 located on locally low lying ground. EIS has failed to demonstrate why tower 121 could not be relocated away from Lemgare Rocks to lessen visual impact of it and the line upon Lemgare Rocks and the landscape.
121	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Moderate	36m high tower located on locally low lying ground close to a local road with line crossing to tower 122 located on locally low lying ground.
122	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Moderate	34m high tower located on locally low lying ground with line crossing to tower 123 located on locally low lying ground.
123	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Moderate	34.2m high tower located on locally low lying ground with line crossing to tower 124 located on locally low lying ground.
124	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Moderate	43m high tower located on locally low lying ground with line crossing to tower 125 located on locally low lying ground.
125	Upland Plateau	Mullyash Uplands	Tall structures should avoid upland flat areas as they are highly sensitive to development	High	Moderate	31m high tower located on locally low lying ground with line crossing to tower 126 located on locally low lying ground in Northern Ireland.

2.3.4 Conclusion

The Environmental Impact Statement (EIS) states that the publication of County Monaghan Landscape Character Assessment is pending and in the absence of it landscape zones have been devised to assist in the assessment of impact on the landscape. However the County Monaghan Landscape Character Assessment was adopted in June 2008 and is readily available. Therefore the assessment of landscape impact in the EIS is inappropriate and inadequate in assessing the impact of the proposed development on the landscape of County Monaghan as set out in the Landscape Character Assessment. The reference to the landscape of Monaghan in section 12.4.2.1 of volume 2B of the EIS as being "relatively homogeneous" was clearly made in the absence of consideration of the Landscape Character Assessment.

The EIS has failed to take cognisance of the County Monaghan Landscape Character Assessment, and should be revised to assess the impact of the siting of the towers in the various Landscape Character Types and Landscape Character Areas and consequent mitigation measures included.

The EIS has also failed to justify the positioning of the towers in particular locations in the local landscape and has not given due regard to policies ENV 2 and ENV3 of the Monaghan County Development Plan 2007-2013. Although it is necessary to balance visual impact of the proposed development with other issues such as proximity of the proposed development to existing and permitted dwellings, impact upon archaeological and architectural structures and impact upon sites of bio diversity, greater detail is required to justify the location of each tower.

The photomontage within the EIS is wholly inadequate as it only identifies a selection of critical views which are not considered to represent locations where the proposed development will be clearly visible from or visible over a wide area. The "worst case scenarios" selected are relatively benign views. For example critical view 14 is taken from a low point where visibility of the landscape and the proposed development is restricted. Critical view 9 is taken from the lower part of a scenic route where visibility of the landscape and the proposed development is restricted. Other locations where there are significant views over the countryside and of the proposed development, such as from the descent south along the public road from the water tower at Kilkitt, from the descent northwest along the public road from the water tower at Corduff, and looking south from the Regional Road R180 at Brackly have been omitted. In additional there appears to be inaccuracies in the imposition of the towers in the photomontages. Tower 61 in view 10 appears to be in the wrong location. The photomontages should also take account of not only the proposed line but also the potential for the line to deviate 40 metres either side of the proposed line.

No Zone of Visual Influence (ZVI) Assessment has been submitted. This assessment is essential both to identify the extent of visual impact of the proposed development and also in terms of identifying critical views. The ZVI assessment should take account of not only the proposed line but also the potential for the line to deviate 40 metres either side of the proposed line.

Photo taken uphill from View 14 – Landscape is more readily visible at this point

View from public road on descent south from Kilkitt Water Tower –
Proposed development will be visible crossing the ridge line in the background

2.4 Impact upon Areas of Primary and Secondary Amenity

In relation to Areas of Primary and Secondary Amenity the County Development Plan states "*Areas of Primary Amenity Value have outstanding landscape quality and Areas of Secondary Amenity Value have landscape quality and potential for recreation. These areas are important not only for their intrinsic value as places of natural beauty but because they provide a real asset for residents and visitors alike in terms of recreation, contemplation and tourism.*"

2.4.1 County Development Plan Policies

There are two principal policies relating to Primary and Secondary Areas of Amenity in the Monaghan County Development Plan 2007-2013 relevant to the proposed development:-

ENV 8 - Limit development in Areas of Primary Amenity Value to those where the applicant has proven to the satisfaction of the Planning Authority that the proposed development would not threaten that the proposed development would not threaten the integrity of these areas.

ENV 10 - Limit development within Areas of Secondary Amenity Value to compatible amenity developments on unobtrusive sites.

2.4.2 Assessment and Conclusion

The Environmental Impact Statement (EIS) has failed to properly assess the potential for impact upon Areas of Primary and Secondary Amenity designated within the Monaghan County Development Plan 2007-2013. In the absence of a Zone of Visual Influence Assessment it would appear that the proposed development is sufficiently removed from the Areas of Primary and Secondary Amenity so as not to have any significant detrimental impact upon their setting or integrity. However, a ZVI assessment included within the EIS would ascertain whether this position is correct or not, particularly in respect to Lough Major and Environs Area of Secondary Amenity.

View of Lough Major from Lough Mor Avenue to immediate south west – Proposed development has the potential to be visible in the background

2.5 Impact upon Views and Prospects

2.5.1 County Development Plan Policies

There is one principal policy relating to views and prospects in the Monaghan County Development Plan 2007-2013 relevant to the proposed development:-

ENV 14 - Protect the views from scenic routes listed in Appendix 2, Scenic Routes. Development will be strictly controlled along these routes and no development will be permitted that will be detrimentally impact on the visual character or amenity of these views. Particular emphasis will be placed on the preservation of views of lakes, rivers, unspoilt landscape or views of historical, heritage and/or cultural interest.

2.5.2 Assessment

The proposed development passes within range of the following scenic routes designated within the Monaghan County Development Plan 2007-2013.

SV 12 – SV 14: Scenic drive and views of open countryside from Mullyash (Routes LS07631, LS03603, LS07650).
The proposed development although 6 kilometres away from the closest portion of these scenic routes will be visible from routes SV12 and SV14. Views of the northern and central portion of the development are possible from scenic route SV12. The central section of the development will be visible from scenic routes SV12 and SV14. The southern portion of the proposed development may also be visible from these scenic routes. The EIS does not appear to have given proper consideration of the impact of the proposed development on the views from these scenic routes.

SV 21: Scenic Views of Lough Egish (Route LP04121)
The central portion of the proposed development will be highly visible from this scenic route and the EIS does not appear to have given proper consideration of the impact of the proposed development on the views from this scenic route.

SV 22: Scenic drive at Beagh, Shantonagh and Corlat (Route LT 40431)
The sections of the southern portion of the proposed development will be visible from this scenic route and the EIS does not appear to have given proper consideration of the impact of the proposed development on the views from this scenic route.

SV 23: Views of Lough Bawn and County Cavan (Route LT 71111)
The southern portion of the proposed development will be visible from this scenic route and the EIS does not appear to have given proper consideration of the impact of the proposed development on the views from this scenic route.

2.5.3 Conclusion

The Environmental Impact Statement (EIS) has failed to properly assess the visual impact of the proposed development upon the views from the scenic routes designated in the Monaghan County Development Plan 2007-2013 and any necessary mitigation measures have not been included. A Zone of Visual Influence Assessment included within the EIS would be seminal in this regard. It also appears that the EIS has not correctly identified the scenic routes in the county as designated in the County Development Plan 2007-2013.

SV 23: Views of Lough Bawn and County Cavan (Route LT 71111) – Proposed development will be visible as it crosses the ridge in the background

2.6 Impact Upon Lakes and Their Environs

2.6.1 County Development Plan Policies

Under the Monaghan County Development Plan 2007-2013 adopted in 2007 there were two policies relating to lakes and their environs:-

ENV 15 - Conserve the scenic and ecological quality of lakes by maintaining their environs free from intrusive development.

ENV 16 - Protect the areas between the public road and lakeshores by restricting development to essential buildings on unobtrusive sites. Such prohibition will also apply to high open landscape overlooking lakes and waterways.

Under variation No.13 to the County Development Plan adopted in July 2009 policies ENV15 and ENV16 were replaced by a single policy known as policy ENV15.

ENV 15 - Protect the scenic quality of lakes by prohibiting development which is located between a public road and a lake, where the development would interrupt a view of the lake, or detrimentally impact on the setting of that lake. Development may be permitted between a road and a lakeshore where the development is screened from the lake by existing topography or vegetation.
An exception to this policy may include short term let holiday accommodation or recreational development where a specific need has been established. The design, scale and setting of development granted under this exception should reflect the site's sensitive location.
For the purpose of this policy a lake is considered to be a permanent (i.e. non seasonal) water feature in excess of 1 hectare.

2.6.2 Assessment

A number of non seasonal lakes lie within the immediate vicinity of the proposed development:-
Lough Nahinch
Tassan Lough
Ghost Lough
Drumgristin Lough
Coogan's Lough
Tome or Crinkill Lough
Lough Egish
Boraghy Lake
Lough Mourne
Bocks Lough
Comertagh Lough

The proposed development will directly and adversely affect the settings of these lakes and their environs in varying degrees. In addition, in a number of instances the proposed development will be located between the road and the lake specifically contravening policy ENV 15 of the Monaghan County Development Plan 2007-2013.

2.6.3 Conclusion

The Environmental Impact Statement (EIS) has failed to assess and mitigate the visual impact of the proposed development upon the settings of these lakes and their environs and consequent mitigation measures have not been included. The EIS has also failed to give due consideration to policy ENV 15 of the Monaghan County Development Plan 2007-2013.

View of Lough Morne from adjoining public road to immediate north - Proposed development will be visible crossing the drumlins in the foreground and background and will be detrimental to the setting of the lake. (Note presence of probable Whooper Swans)

2.7 Impact Upon Trees and Hedgerows

In relation to trees and hedgerows the County Development Plan states "*Trees and hedgerows contribute significantly to biodiversity and landscape character in County Monaghan. Hedgerows have significant ecological importance as wildlife habitats and historical importance as town land and field boundaries as well as providing visual screening."*

2.7.1 County Development Plan Policies

There are three principal policies relating to trees and hedgerows in the Monaghan County Development Plan 2007-2013 relevant to the proposed development:-

ENV 17 - Protect trees and hedgerows from development that would impact adversely upon them.

ENV 18 - Preserve trees and/or groups of trees that form significant features in the landscape or have particular importance in setting the landscape character of an area or which contribute to the biodiversity of the area (Appendix 3, Trees of Special Amenity Value)

ENV 24 - Promote the management and development of wildlife features such as hedgerows, riparian corridors and wetlands that are essential for the migration, dispersal and genetic exchange of wild species

2.7.2 Assessment

The proposed development is sufficiently removed from any Trees of Special Amenity Value designated within the Monaghan County Development Plan 2007-2013 so as not to have any impact upon their setting or integrity.

The proposed development has the potential to directly affect undesignated trees and hedgerows along its route as the route crosses a substantial number of field boundaries and stands of trees that may need to felled/removed to facilitate the development.

2.7.3 Conclusion

The Environmental Impact Statement (EIS) has failed to assess the impact of the proposed development upon trees and hedgerows along its route, particularly as the proposed line only has a ground clearance of nine metres This low level clearance has the potential to significantly affect almost every hedgerow that the proposed development crosses and consequent mitigation measures have not been included. The proposed development may also necessitate the creation of access tracks between towers in the construction period which could result in hedgerow removal.

2.8 Impact upon Bio Diversity

In relation to bio diversity the County Development Plan states "*County Monaghan has a rich natural heritage, particularly in relation to its wide range of natural and semi-natural habitats including wetland, woodland, lake, river and upland habitats that support a wide range of plant and animal species. These areas are in the main extremely sensitive and are susceptible to any change that affects the ecological balance*."

2.8.1 County Development Plan Policies

There are three principal policies relating to biodiversity in the Monaghan County Development Plan 2007-2013 relevant to the proposed development:-

ENV 22 - To protect, enhance and promote for current and future generations the rich biodiversity of County Monaghan.

ENV 23 - Protect and enhance, plant and animal species and their habitats, which have been identified under the EU Habitats Directive, EU Birds Directive, the Wildlife Act and the Flora Protection Order.

ENV 25 - Protect the cSACs, SPA and pNHAs, listed in Appendix 4 by resisting development which would detrimentally impact on the conservation status of those sites. Development in these areas will only be permitted where it has been clearly demonstrated to the satisfaction of the Planning Authority that any such development will have no significant adverse effects.

2.8.2 Natura 2000 Sites

There are two designated Natura 2000 sites within Monaghan:-
1. Kilrooksy Lough Cluster Candidate Special Area of Conservation (cSAC)
2. Bragan Mountain Special Protection Area (SPA)

2.8.3 Proposed Natural Heritage Areas

The proposed development passes within close proximity of three proposed Natural Heritage Areas:-
1. Lemgare Rocks
2. Tassan Lough
3. Lough Egish

Lemgare Rocks pNHA (Between towers 119 and 120)
This site is a proposed Natural Heritage Area due to its geological interest. This designation is referred to in the Soils and Geology section of the EIS, but not in the flora and fauna section. No map showing the pNHA extent is provided in the EIS. The EIS should show the boundaries of the pNHA on the habitat map. Tower 119 or 120 may be within boundary of pNHA. Impact would then have to be assessed accordingly. In order to fully assess the impacts, a map of Lemgare Rocks pNHA is required to be submitted showing proposed tower locations and access work routes.

Tassan Lough pNHA (South of towers 112 and 111)
This small wetland site comprising a mesotrophic lake, reed swamp and transition mire covers an area of 6 hectares. This proposed Natural Heritage Area is of considerable conservation interest despite its small size, due to its diversity of habitats and vegetation and its fen habitat. This site is also part of the old lead mining complex and old spoil heaps are onsite. This site was surveyed as

part of the Monaghan Fen Survey (2008, Foss and Crushell), and its "B" or national status was reaffirmed.
Tassan Lough was surveyed for dragonflies in the 2009 Monaghan Irish Damselfly and water beetle survey (Woodrow and Nelson). Six species of dragonflies were recorded on 15 June 2009:

- Variable damselfly 3
- Common blue tailed damselfly 60+
- Common blue-tailed damselfly 1
- Large red damselfly 8
- Hairy dragonfly 3
- Four spotted chaser 13

Currently the proposed development is routed away from Tassan Lough pNHA, so the impacts on site ecology will be neutral. If the towers are routed closer to the site through micro siting provisions, or onsite then negative impacts may occur. Due to the importance of the site in ecological terms, if the towers are routed closer an ecological impact assessment of the consequences for the ecological integrity and conservation status of the site will be required.
As the site is of national importance the impacts are likely to be negative moderate to significant.

Lough Egish pNHA (South east of towers 67 and 70)
Lough Egish is primarily an area of ornithological scientific interest and it is a good over-wintering site for Whooper and Bewick's Swans and Goldeneye. Breeding birds recorded here include Black-headed Gull, Common Sandpiper, Lapwing, Coot, Great Crested Grebe, Little Grebe, Tufted Duck and Pochard. The lake has definite potential in terms of educational value, especially with regard to bird watching. The lake is easily accessible and there are no physical impediments to walking around the periphery of the lake.

Currently the proposed development is routed away from Lough Egish pNHA, so the impacts on site ecology will be limited. If the towers are routed closer to the site through micro siting provisions then an ecological impact assessment of the consequences for the ecological integrity and conservation status of the site may be required.

2.8.4 Wetlands/Fens/Bog

The proposed development also passes through a number of wetlands and has the potential to adversely affect their integrity. In 2009 Monaghan County Council and the County Monaghan Heritage Forum agreed a Biodiversity Action Plan for the county. The LBAP stresses the particular importance of wetland habitats in the county, and the majority of actions in the plan focus on the understanding and conservation of these important habitats.

As part of the implementation of the County Monaghan Heritage Plan 2006-2010 and the County Monaghan Biodiversity Plan, Monaghan County Council has undertaken several studies to improve knowledge of biodiversity in the county.

Monaghan Wetland Survey	BEC (2006)	Monaghan County Council, jointly funded by the Heritage Council
Monaghan Fen Survey	Foss and Crushell (2007)	Monaghan County Council, National Parks and Wildlife, Environmental Protection Agency, Heritage Council
Monaghan Fen Survey	Foss and Crushell (2008)	Monaghan County Council, National Parks and Wildlife, Environmental Protection Agency, Heritage Council
Monaghan Dragonfly Survey	Woodrow et al (2008)	Monaghan County Council, jointly funded by the Heritage Council
Monaghan Irish Damselfly and Water beetle survey	Woodrow and Nelson (2009)	Monaghan County Council, jointly funded by the Heritage Council

Monaghan County Council has also undertaken awareness raising work on the value and benefits of conserving our biodiversity:

Wonderful Wetlands book and poster series	2007
Wise Use of Wetlands conference	2008
Vote for Monaghan's favourite wild thing	2009

Many of County Monaghan's important wildlife sites have no official designations, but survey work has shown that a high proportion of these undesignated sites are of national importance or B status. Monaghan has experienced considerable loss of wetland and peatland habitats in the past, but now with an increased understanding of their importance for biodiversity and ecosystem services, and local obligations to contribute to the government commitment of "no net loss" of biodiversity it is considered desirable to conserve these sites both by the local authority and nationally.

Drumgallen Bog/Fen (west of tower 118)
The large site with 34.3Ha in County Monaghan and a similar area in County Armagh (Drumcarn) is of national importance. This site was surveyed in 2007 as part of the Monaghan Fen Survey (Foss and Crushell). This former acid peat bog was hand cut out in the past and has developed an extensive area of transition mire vegetation (11.8 Ha) with small upstanding areas of residual peat with ling heather and gorse vegetation. Marsh Fritillary, an EU Habitats Directive species of butterfly has been recorded in Drumcarn and is likely to be found in County Monaghan as well, as it is one contiguous site. If Marsh Fritillary is discovered then it should be considered for SAC status and of international importance.

The Monaghan Dragonfly Survey (2008, Woodrow Sustainable Solutions) recorded 10 species of dragonflies and damselfies at the site. The Monaghan Irish Damselfly and Water Beetle Survey (2009, Woodrow and Nelson) found 15 species of water beetles in one of the areas of transition mire, three of which are classified as "near threatened" in the Water Beetles Red Data List. The dragonfly population is classified as nationally important; the water beetle population is also classified as nationally important.

As long as the towers remain routed away and are not disturbing the hydrological regime of Drumgallen / Drumcarn then the impacts on the site ecology will be neutral. If the towers are routed closer to the site through micro siting provisions, or onsite then negative ecological impacts may occur. Due to the importance of the site in ecological terms, if the towers are routed closer an ecological impact assessment of the consequences for the ecological integrity and conservation status of the site will be required.

Cashel or Lough Nahinch (Towers 109 and 110 on site)
This site is given a PB4 cutover bog classification on the EIS habitat map, although there is clearly a mosaic of habitat types present. This site is a very important habitat complex which is unrecognised as such in the EIS.

This site of 65.8 hectares consists of a complex of habitats including 3 lakes, extensive areas of poor fen and regenerating bog. It was surveyed in the Monaghan County Council Fen Survey (Foss and Crushell) and classified of B status or of national importance. It has been recommended for designation as a Natural Heritage Area.

The water table at this habitat complex is at the surface, as determined in the Monaghan Fen Survey. Construction impacts on the hydrology of this site has not been assessed in the EIS. The EIS also fails to address how construction machinery will access this site and the associated impacts. The site is extremely wet, with a surface water table and quaking vegetation of a high ecological quality.

This large site contains a complex of habitats including three lakes, extensive area of poor fen, regenerating bog, scrub, wet woodland and mixed broadleaf woodland. This large site is of ecological interest due to the diversity of habitats present accompanied by the undisturbed nature of the site. An extensive area of poor fen is of considerable interest. The site is deemed to be of high ecological value.

The bog, scrub and wet woodland communities occur on an area of cutover bog / heath upslope of the lakes. The scrub / woodland have developed on raised mineral ridges while bog communities are regenerating in the intervening depressions. Much of the scrub is dominated by a Gorse (*Ulex europaeus*) thicket, making access into much of the site difficult.

The regenerating bog areas have extensive interlocking hollows and pools with intervening hummocks. A full compliment of typical bog flora occurs in these discrete areas with some poor fen species also represented.
The main area of fen comprises an extensive quaking scragh of poor fen adjacent to the most southern of the three lakes.
The vegetation here is dominated by *Sphagnum fallax* in the complete ground layer with Bottle Sedge (*Carex rostrata*), Marsh Cinquefoil (*Potentilla palustris*) abundant in the herb layer.

Some infilling and dumping occurs adjacent to the road transecting the northern part of the site but elsewhere there is no evidence of recent damaging activities and little land-use activities.

Also recorded on the site are ringlet butterflies (4), newt, frogs, brown hawker, common blue damselflies (65), common blue-tailed damselfly (1) and Four spotted chaser dragonfly (26).

The location, construction and access to the site to build towers will create a significant negative impact on this largely undisturbed site. Direct habitat removal will result from Eirgrid proposal due to the footprint of the towers and the access tracks that will have to be constructed through the wetland.

The EIS on p118 considers the impact level to be imperceptible negative on this important site. It is considered that this analysis to be highly misleading. Using the impact significance table provided in figure 7.8 of the EIS, the impact will be “significant negative” due to the status of the site as nationally important and as the towers will have permanent impacts on a small part of the site. The towers should be routed away from this site.

Clarderry (Within route corridor, just west of tower 101)
From 2005 aerial photography, it is apparent that this site contains a mosaic of wetland and peatland habitats, including some wet woodland. The OS 1836 map shows this site as being a much larger complex extending westwards to include six mile lakes, and northwards to include Little Lough, a lake which has now been completely drained. Nonetheless should any towers be proposed for location on the site, an ecological survey would be required.

This site should continue to be avoided by the towers to ensure no impacts.

Ghost Lake,north of Coogan’s Lough (Within route corridor, west of tower 99)
This site is marked on the EIS Habitat Map as FL5 or lake. No cognisance has been taken of the extensive wetland habitat which surrounds this lake, which is clearly identifiable on the aerial photographs. The site is known locally as Ghost Lake, is margined by rock outcrops, or moraines and very extensive undisturbed habitat with extensive areas of reed, rushes, and small areas of scrub. Swans, possibly mute use this site.

Based on photographs of the site Dr. Peter Foss, peatland and wetland ecologist, who has undertaken wetland surveys in the county provided information on the classification of Ghost Lake as FL5 in the EIS. From an examination of the photographs he is of the opinion that the site contains the following habitats (after Fossitt 2000):

- FL - Lake habitat (this may be a eutrophic lake FL5, due to the proximity of adjacent farmland and pasture. It is difficult to be certain of the lakes status (possibly site may be a mesotrophic lake FL 4) without further examination of the emergent plants present in the lake during the growing season - this would allow definitive characterisation.
- FS1 - Reed bed and large sedge swamp, which appears to be the dominant habitat after the open water of the lake
- WN6 - Wet willow alder ash woodland, indicated by a number of small stands of what appears to be willow scrub
- GS4 - wet grassland which can be seen on the lake side of the fence in image DSC 0451
- PB4 - Cutover Bog remnant, indicated by a small stand of heather at the base of the ridge, running down to the reed bed directly above the pump house seen in image DSC 0451 The ridges visible in the distance appear to be covered by semi- improved grassland (possibly GS or GA)

Ghost lake with surrounding habitat.

These three lakes: Ghost, Drumgristin and Coogans and their associated habitats should continue to be avoided.

Tullynahinera (Within route corridor between tower 72 on site and tower 73 adjacent)
The EIS Habitat map does not show full extent of this site, marked as PB4 or cutover bog. The full extent of the site includes the proposed location of tower 72. It is a large wetland / peatland complex, which although has had some drainage and has reduced in size in comparison to the 1836 map, still merits an ecological survey. Aerial photography shows that there is a mosaic of habitats present on site, which may include secondary fen habitats, and tower 72 is located within these habitats.

No ecological survey has been undertaken of this site. However, given the site size and information on other similar sites it is likely to be of C status or high value locally important. The location of tower 72 within the site will have permanent impacts on a small part of the site, and likely therefore to have moderate negative impacts.

Site access requirements are likely to increase impact size. The line should be routed away from this bog.

Lisduff (Within route corridor, tower 74 within site)
The 1836 OS map shows that this site was part of the site at Tullynahinera. Although quite small in size, this remnant of an originally larger site merits an ecological survey.

No ecological survey has been undertaken of this site. This site is likely to be of at least "D" status, or moderate value locally important. A tower onsite will have permanent impacts on a small part of the site and likely to have moderate negative impacts.

Tooa (Within route corridor, tower 59 on margins)
This site of Ash-hazel woodland, is marked as woodland on the 1836 OS map, and is likely to be of at least county importance.

The proposed location for the tower is at the southern margin of the site. If the location does not extend further into the site through micro siting provisions then the impact should be slight negative. Any proposal to directly remove woodland habitat should require a full ecological assessment.

Raferagh (Within route corridor, east of towers 34 and 35)
This site is shown on the EIS Habitat map as a lake only (FL5). However, this is a large wetland complex with two small areas of open water and a mosaic of wetland habitats. The 1836 Ordnance Survey Map shows one continuous bog area with one area of open water. It is likely to have been cutover, and is now converting to secondary fen habitats. The Monaghan Dragonfly Survey (2008) site record describes it as a fairly small lake of less than 1 hectare surrounded by fairly extensive wetland vegetation dominated by reed and tall sedge fen. This site is of national importance for dragonflies. It has a large population of the rare Irish Damselfly, and there is evidence that they are successfully breeding onsite.

	2008 Records	**2009 Records**
Emerald Damselfly	8	-
Azure Damselfy	8	-
Variable Damselfy	55	25
Irish Damselfy	32	58+
Common Blue-tailed damselfly	6	-
Large Red Damselfly	200	200+
Hairy Dargonfly	1	1
Common Darter	6	-
Four Spotted Chaser	3	5

The small area to the east of the main area of open water was also surveyed for dragonflies in 2009. 68+ Irish damselflies were recorded at this end of the site in 2009, and it was determined that probable successful breeding occurred onsite. These figures demonstrate the importance of the entire site for dragonflies.

This entire wetland site, comprising the two small water bodies and associated habitats, is just to the east of the 80m corridor. As long as the corridor avoids the site completely then the impact should remain neutral on the site ecology. Any proposed adjacent activities such as excavation or construction need to be assessed for their potential impacts on overall site hydrology and water quality, in light of the nationally important dragonfly population and the possible existence of EU habitats onsite.

If the route is brought closer to the site through micro siting provisions, an ecological impact survey will be required to determine the impacts of the proposal for site integrity and conservation status. Any works which will change water quality status will also require a full assessment.

Corlea Bog (Within route corridor, tower 26 located adjacent)
This site was surveyed as part of the Monaghan Fen Survey 2008. The site is classified as of B status or of national importance and has been recommended in the report for designation as a Natural Heritage Area.

Corlea is located 6.5 km west south west of Carrickmacross.
This small site comprises an inter-drumlin wetland. The site is intersected by two secondary roads causing fragmentation of the habitats present. The roads split the site into three distinct sections; the eastern part, the central part and the southern part.

The eastern and southern parts contain a mosaic of disturbed habitats including wet willow scrub and wet grassland. These are very small wetland units that have been impacted by the adjacent road, infill and drainage.

The central part of the site is a cutover raised bog with regenerating transition mire in the central part and poor fen / bog communities around the margin. There are a few remnants of raised Ling Heather (*Calluna vulgaris*) patches. Downy Birch (*Betula pubescens*) and Grey Willow (*Salix cinerea*) are scattered throughout this part of the site.
The transition mire is mainly dominated by Lesser Tussock Sedge (*Carex diandra*) with typical floating scragh species including Water Horsetail (*Equisetum fluviatile*), Bogbean (*Menyanthes trifoliata*), Greater Spearwort (*Ranunculus lingua*) and Marsh Cinquefoil (*Potentilla palustris*). *Calliergon* spp. dominate the moss layer.
Discrete patches of poor fen contain *Sphagnum fallax* and *Sphagnum squarrosum* carpets with Marsh Cinquefoil (*Potentilla palustris*), Common Cotton-grass (*Eriophorum angustifolium*), Marsh Violet (*Viola palustris*) and Wild Angelica (*Angelica sylvestris*).
The transition mire and poor fen communities add to the ecological value of this small wetland site.

The EIS considers the impact of the development to be imperceptible negative.
However, as the site is of national importance, and the wires will cross the site, with tower 26 located just on the margins, the impact on the ecology will be significant negative, as permanent impacts on a small part of the site will occur.

An ecological impact assessment is required. Recommend avoiding this bog.

2.8.5 Birds

The environmental information provided in the EIS with regard to birds is inadequate. The EIS has a section entitled Breeding Bird Survey, but no site lists or bird counts are provided. No historical data from bird atlases is provided.

In order to make a judgement on the significance of impacts, information is needed on species, numbers, trends and distribution. Information is also required in order to assess hazards such as avoidance behaviour, habitat change or collision risk.

Information is provided on conservation status of individual species, but there is no information provided on sensitivity of species and supporting habitats, or any special ecological functions provided by any sites in the county.

Whooper Swans

These birds over-winter in County Monaghan using a number of sites distributed over the county. They are listed on Annex I of the EU Birds Directive and are of conservation concern. Their numbers appear to be dropping in the county over the last decade. In 2000 Colhoun reports that there are 19 flocks totalling 385 Whooper Swans. In 2005 Colhoun reports that there are 12 flocks totalling 357 whooper swans. If numbers are dropping in the county, then maintaining the current population is of even more importance.

Hierarchy of sites importance for Whooper Swans

The EIS combines the Whooper Swan site data for route corridor options A,B and C to determine a site hierarchy. As corridor A is the main focus of the EIS, the information relating to sites on route corridor A only has been extracted and ranked in the table below below.

Site	Approx distance (km)	No. of counts	Max birds	Mean	Index of relative importance
L. Namachree	1.5	6	65	32	21.6
L. Creeve	3	10	25	11	10
Ballintra	0.5	10	45	12	7.5
L.Lisnakillewbane	4	10	56	12	4.9
L.Tonyscallan	1	10	32	6	2.3
L.Derrynaloobinagh	4	10	31	4	0.8
L.Comertagh	<0.5	10	10	2	0.3
L.Egish	2.5 (max), lake shore within 1km.	10	8	1	0.2
L.Milltown	5	10	5	1	0.2
L.Annaghlen	6	10	2	0	0

According to the EIS, Whooper swans were not recorded at the following sites: Lough Bawn, Lough Major, Lough Morne, L. Sillan and L. Crinkell. However, the EIS notes that Crinkill is a roost site for birds at Ballintra. It should therefore be rated alongside Ballintra on the hierarchy of important sites, and not placed at the end of table 4-3 as of zero relative importance.

Ballintra, L.Crinkell and L.Tonyscallan form an important site cluster.

A flock of 12 whooper swans were recorded at Lough Morne on the 17th February 2009 (photograph available). No birds were recorded here by the Eirgrid survey. The EIS states that no flightlines were found between these two lakes.

However, based on this new information and due to the proximity of this site to the proposed route, and the proximity of this lake to Lough Egish, further investigations are required in this area.

Whooper Swans have been recorded by the local community using fields along the Ballintra River (see picture below).

The EIS acknowledges that there still may be a significant risk of collision by Whooper Swans in the area around Ballintra. The EIS also states that the route will maintain a minimum of approximately 400m from any lake utilised by Whooper Swans and foraging area, specifically in the Ballintra area. The fields in use by a flock of appoximatley 25 birds, in the photograph above may be within 400m of the proposed route, west of towers 89 and 88. This photograph was taken in February 2009.

Repositioning of the route may be required as a result.

Other areas where a similar risk of collision by Whooper Swans include:

Comertagh Lough. A flock of 20 Whoopers were recorded in the fields to the north-east of this lake on the 17th February 2009 (photograph available). No dawn and dusk watches were conducted at this site as part of the EIA to determine flight lines. The maximum number of Whoopers recorded here in the EIS is 10.
Whooper Swans were recorded here in the EIS on 6.12.07 and 08.01.08, but not for the following eight counts. The EIS has failed to establish what other site(s) this flock uses. Comertagh Lough is within 500m of the proposed development. Due to the concentration of small lakes in this area, and the increase in size of this flock, it must be studied to understand their behaviour and movements. It is possible that they use a flightline which crosses the proposed route.

It seems clear that the swans utilise a number of sites in the vicinity of route A, and some of these sites may be unrecorded in the EIS. The EIS states that Monaghan and Cavan provide an abundance of alternative sites for Whooper Swans leading to a dispersed population. It would be useful to identify further clusters of sites and in order to assess these sites, habitat surveys for quality and species needs are required, particularly if there is a risk of displacement due to the proposal. The habitats in Monaghan tend to be of a smaller scale than elsewhere in the country, so the cumulative benefit of a number of sites together for the Whooper Swans needs to be assessed as well as the individual sites.

Further discussion and analysis of the success of line marking to reduce risk of bird collisions with the lines is required. One survey from Scotland is mentioned in the EIS, but no detail on the findings is discussed to determine if it is comparable with the situation in Monaghan.
On the basis of the information provided the nature and scale of the impact of the proposed development upon the Whooper Swan population in the region cannot be ascertained. Additional survey work is required to ensure that Monaghan maintains its Whooper Swan and other swan populations. The approximate distances provided are too vague. Maps are required showing the route, tower locations and whooper swans sites at a large scale are also required. Additional information on impacts upon Whooper Swans, identification of alternative sites and information on study referred to from Scotland is necessary.

2.8.6 Conclusion

The Natura 2000 sites are located in the northeast of the County and therefore the proposed development is sufficiently removed from both the cSAC and SPA so as not to have any impact upon their conservation objectives.

The Environmental Impact Statement (EIS) has failed to properly assess the impact of the proposed development upon bio diversity in the vicinity of the proposed development and consequent mitigation measures have not been included. It is apparent from the lack of detail provided, in particular for flora and ecology, that no botanical surveys were undertaken on the ground. Access restrictions are blamed for lack of detail in the EIS at all times, but it should be noted that more detailed information could have been provided by careful analysis of aerial photography, historic mapping and other sources. Detailed habitat surveys and ecological impact assessments for any site to be directly or indirectly impacted by the proposed development is necessary.

The habitat classifications provided on the maps and in the flora and fauna sections have not been elaborated upon, and are at a very general level. Cutover bog is often used as a broad term, although most of these sites are mosaic habitats with transition mire and secondary fen vegetation which should be recorded. Lakes are recorded as simply lakes with no reference to their fringing and surrounding habitats.

No species lists for any site are provided. No detail on protected flora is provided.

Some of the detail regarding “status” of sites has been incorrectly transcribed from Monaghan County Council reports, to give a lower importance to sites. For example Corlea Bog, page 99 vol 2B, is stated to have been identified in the Fen Survey of Monaghan “….as a diverse site of high local value. This is a C status.” The Monaghan Fen Survey actually rated this site to be of National Importance, of B status. This cutover bog site (7.7ha) has 3.4ha of transition mire, and a species protected by the Flora Protection Order.

Contour / topographical maps showing each tower, its elevation and its relationship to surrounding area should be submitted. New photomontage pictures should be developed, showing visual impact on the proposed tower locations. A constraints map showing all features of natural and cultural heritage, so that the interrelationships between environmental factors can be analysed is necessary.

2.9 Impact upon Architectural and Built Heritage

2.9.1 County Development Plan Policies

There are two principal policies relating to Architectural and Built Heritage in the Monaghan County Development Plan 2007-2013:-

ENV 27 - Protect and / or conserve, as appropriate, all structures included in the Register of Protected Structures set out in Appendix 5

ENV 28 - Resist development which is likely to adversely affect the setting of a structure included in the RPS, where the setting is considered of importance.

2.9.2 Assessment and Conclusion

Although the proposed development passes in the proximity of a number of protected structures and historic gardens, it is considered that it will have limited impact upon the integrity or setting of these structures. A Zone of Visual Influence Assessment included within the Environmental Impact Statement (EIS) would be seminal in making a full assessment in this regard.

View over NIAH Garden and Landscape at Shantonagh House from Scenic drive **SV 22** at Shantonagh (Route LT 40431) – Proposed development will be visible passing along drumlins in the background

2.10 Impact upon Archaeology

2.10.1 County Development Plan Policies

There are five principal policies relating to Archeology in the Monaghan County Development Plan 2007-2013:-

ENV 34 - Safeguard the value of archaeological sites listed in the RMP, Appendix 6 by strictly controlling any development that may prove injurious to the historical, archaeological, scientific and/or educational value of any monument or place.

ENV 35 - Protect the monuments and places listed in Appendix 6 to ensure that the importance of the setting of the monument or site, and its interrelationship with other archaeological sites is not materially injured, and that no development will impinge directly on any monument or site or on any associated archaeological material.

ENV 36 - Co-operate with the Department of the Environment, Heritage and Local Government and all other relevant bodies in providing maximum protection to any monument or place of archaeological importance not listed in Appendix 6 and discovered within the lifetime of this plan.

ENV 37 - Encourage archaeological investigations at pre-approval stage where development is proposed on areas of archaeological potential.

ENV 38 - Consider archaeological value when considering proposals for public service schemes, electricity, sewage, telecommunications, water supply and proposed road schemes where these impinge on or are in close proximity to Recorded Monuments and Places and/or Areas of Urban Archaeology.

2.10.2 Assessment and Conclusion

The proposed route runs from the south-west of County Monaghan to the north-east of the county.

The modern County Monaghan is situated between the royal site at Tara and Emain Macha or Navan Fort in Armagh. Monaghan's archaeological resource needs to be considered in terms of its regional context.

There is a strong band of recorded megalithic tombs running from north east to west across the county. There are 34 megalithic tombs recorded in County Monaghan indicating a similar concentration as adjacent counties of Cavan (59) and Louth (21). There are a further 16 possible megalithic tombs also listed on the Archaeological Inventory.

On the proposed route, there is a particular cluster of megalithic tombs in the area from Cornamucklagh South going northwards to Lennan. There may be added potential for archaeological evidence of Neolithic settlement or other monuments in this area. There is another cluster in the north east of the county in the few kilometres around Lemgare.

During the Bronze Age, County Monaghan was situated between the important centres of Emain Macha and Tara. Bronze Age Barrow cemeteries and cairns are less well represented in the county with only 7 in Monaghan and 66 in Cavan and 41 in Louth. This may indicate that there are a lot of unrecorded bronze age archaeological sites in the county.

Similar comparisions can be done for other types of monuments in the three counties, which depending on results can point to the need for particular care when proposing development works.

Although there is no intention to directly impact on any known archaeology, but there will be significant visual impact on a number of sites according to section 14.4.3.1 of the EIS.

In order to determine the nature and scale of these impacts, a photographic analysis of the nature of these visual impacts should be provided. No imagery suitable for assessing these impacts has been provided. Impact on the monuments and their setting must be properly considered.

The archaeological information provided concentrates on sites, as distinct from archaeological landscapes. It is recommended that additional information be provided on significant historic landscapes, and the landscape setting of monuments, their OD, and the OD of the proposed towers.

Black Pigs Dyke (Archaeological inventory 1230)
This Bronze Age or Iron Age fortification is a recorded monument on the RMP (Fastry-Cornapaste) and there are obvious surface remains along some of its length in County Monaghan, at the east, south of Lough Muckno and to the west of the county south of Scotshouse. Discontinuous portions are visible in the following townlands:
(MO016-012)- (MO021-011) Cornapaste, Annagheane, Killark, Drumavan, Skerrick West, Corrackan, Aghnaskew, Lattacrossan, Aghareagh West, Corrinary
(MO022-022) Corrinary, Drumgrone, Corrinshigo
(MO025-044) Maghernakill. Drumgristin

Aidan Walsh, former Curator of the Monaghan County Museum undertook excavation on the Black Pigs Dyke in 1982, and findings are published in the Clogher Record (1991).

Although its location in part of the county is not apparent in the present day, it should be noted that remains between the east and west portions may exist between the RMP squares 22 and RMP 25.

Recorded Monuments within Corridor
Quite a number of recorded monuments are within the corridor and these are listed below. Those immediately beside (within 100m) transmission line are in **bold.** Their distance from line is given in brackets.

Mo030-037	**Skalkill**	**Ringfort**
MO030-021	**Cornalaragh**	**Ringfort Commanding views(D54m)**
MO027-096	Corvally	Earthwork, fort
MO027-097	Ardragh	Ringfort, panoramic views
MO27-074	Sreenty	Ringfort. Bulldozed in 1996.
MO027-110	Sreenty	Earthwork
MO027-072	Sreenty	Earthwork
MO027-076	Ummerafree	Earthwork and hut site
MO027-075	Ummerafree	Earthwork
MO027-077	**Corrinenty**	**Enclosure (D83m)**
MO027-037	Corrnasassonagh	Earthwork, fort
MO027-034	Beagh	Crannog in Bocks Lough
MO027-031	Tullyglass	Ringfort. Commanding views.
MO027-32	Tullyglass	Enclosure
MO027-008	Tooa	Earthwork on ridge running EW
MO027-007	Tooa	Ringfort and hut site
MO027-009	Reduff	Barrow
MO024-032	**Aghmakerr**	**Ringfort (D84m)**
MO024-022	Tullynahinnera	Earthwork
MO024-10	Carrickanure	Earthwork Rathrim Fort
MO024-003	Drumguillew Lr	Meaglithic tomb Court tomb Giants Grave
MO019-038	**Cornamucklagh South**	**Ringfort, magnificient views. (D20m)**
MO019-037	**Cornamucklagh South**	**wedge gallery grave. Locally known as “cashel”. (D25m)**

MO019-025	Ruasker	Megalithic tomb wedge tomb
MO019-020	Drumlongfield	Earthwork
MO019-024	Rausker	Rath panoramic views
MO019-023	Cordevlis	Rath
MO019-16	Lennan	Megalithic tomb. Mass rock in adjacent field.
MO019-17	Drumroosk	Earthwork
MO019-004	Lennan	was classified as megalithic tomb but since reclassified.
MO014-033	Carraickanure	Burial ground, associated with clachan settlement
MO014-032	Carrickanure	Ringfort
MO014-034	Croaghan	Crannog on old shoreline of Tassan Lough
MO014-035	Latnakelly	Ringfort
MO014-027	Tassan	Ringfort
MO014-028	Lisdrumgormley	Ringfort
MO015-003	Annaglogh	Rath and other enclosures
MO015-002	Annaglogh	Ringfort
MO015-001001/MO015-001005	Annaglogh	Rath, souterrain and hut sites
MO014-022	**Lemgare**	**Megalithic court tomb (D84m)**
MO014-021001	**Lemgare**	**Ringfort and building (D40m)**
MO014-39	Lemgare	Souterrain
MO014-020	Coolartragh	Rath

Sites which the EIS state will be moderately or significantly impacted are listed below.

A moderate impact is defined in the EIS as an impact which alters the character of the environment in a manner that is consistent with existing and emerging trends.

A significant impact is defined in the EIS as an impact which by its character, magnitude, duration or intensity alters a sensitive aspect of the environment.

More information is required on these impacts. A photographic analysis of the nature of these visual impacts should be provided, in order to assist in the assessment of impact. No imagery suitable for assessing these impacts has been provided. Impact on the monuments and their setting must be properly considered.

Moderate negative visual impact

MO014-022	**Lemgare**	**Megalithic court tomb (D84m)**
MO014-021001	**Lemgare**	**Ringfort and building (D40m)**
MO024-032	**Aghmakerr**	**Ringfort (D84m)**
MO027-077	**Corrinenty**	**Enclosure (D83m)**

Significant negative visual impact

MO019-038	**Cornamucklagh South**	**Ringfort, magnificient views. (D20m)**
MO019-037	**Cornamucklagh South**	**wedge gallery grave. Locally known as "cashel". (D25m)**
MO030-021	**Cornalaragh**	**Ringfort Commanding views(D54m)**
MO030-037	**Skalkill**	**Ringfort**

The corridor width should be shown on maps illustrating RMP sites and the tower numbers and the locations need to be shown on maps showing RMP sites. Photomontage or other similar means to show nature and scale of impacts on archaeological monuments is also required.

Copies of the Lidar imagery that was used in the archaeological survey is referenced a number of times, but no images ave supplied for analysis and information.

Contour / topographical maps showing each pylon, its elevation and relationship to surrounding area should be submitted. New photomontage pictures should be developed, showing visual impact on the proposed tower locations. A constraints map showing all features of natural and cultural heritage, so that the interrelationships between environmental factors can be analysed in necessary

Unrecorded Archaeological sites
Three additional potential archaeological sites are within the corridor:-

Tassan, Lackey's Brae (North of tower 111) - Mass rock is recorded here at a low place off a private lane.

Two sites are in Derryhallagh. There are no recorded monuments in Derryhallagh, or the adjoining townlands of Clarderry or Dunfelimy. The megalithic portal tomb at Lennan is to the west.

Derryhallagh (*Close to tower 99)* - In field to west of Ghost Lake, nine large stone, recently cleared of overgrown vegetation. Landowner recalls stories from his childhood that it was called a grave, and he was warned by his father never to remove it. Also recalls story of a body being waked on the stones, and a person falling asleep with the corpse only to wake with the ground spinning.

National Monuments Service have advised as follows:

The stones could be grouped together as a result of past field clearance. No definitive formation or alignment seems to be very evident. However, the location of the site is interesting, the local folklore cannot be ignored and there is also a megalithic tomb noted in the adjacent townland. Therefore, the archaeological significance of this site cannot be dismissed too quickly without further investigation. There are no recorded monuments in the townland of Derryhallagh which is also unusual.

Potential archaeological site at Derryhallagh.

Derryhallagh (*Adjacent to tower 100)* - A circular flatish enclosure, with large flat stones. Legend that there was a cave opening here that was filled in. Family always called it an old grave. This site can be picked out on the aerial photographs as immediately beside the tower.

Potential archaeological site at Derryhallagh.

2.11 Visual Impact of Towers

2.11.1 Assessment

Four alternative types of tower were considered in the EIS based on extent of visual impact.:-
1. Standard $NL-_{401}$
2. $C-IVI-_{1}$ tower
3. $C-VVV-_{1}$
4. Inverted Delta

2.11.2 Conclusion

The $C-IVI-_{1}$ has been selected by the developer on the basis of visual impact. It is concurred that of the four alternatives the $C-IVI-_{1}$ tower would have the least visual impact. However, given the difference of up 16 metres between tower heights more information on the visual impact of the height of each tower at each location is required, particularly in regard to the provisions under Class 28 of Part 1 of Schedule 2 of the Planning and Development Regulations 2001 which permits the deviance of the permitted route of an electricity line within an 80 metres wide corridor (40 metres to either side of the permitted route). Greater details on the tower base level should also be provided in each instance given the potential for significant change in ground levels within an 80 metres wide corridor.

2.12 Noise

2.12.1 County Development Plan Policies

There is one principal policy relating to Noise in the Monaghan County Development Plan 2007-2013 relevant to the proposed development:-

ENV 47 - The Planning Authority will seek to protect the amenity of individuals, dwellings, businesses, community facilities and other existing development, when assessing proposals for development that are likely to generate significant levels of noise.

2.12.2 Assessment

There are concerns regarding the noise impact on residents, particularly of Corona Noise in wet weather conditions. The results of night time noise readings taken at rural locations are quite high ranging between 45-48dBA where typical night time values would range from 25-35dBA. There is also a risk of Noise Nuisance at certain locations during construction particularly where it would be necessary to operate generators, pumps or equivalent machinery during night time hours.

2.12.3 Conclusion

The Environmental Impact Statement (EIS) has failed to adequately assess the impact of noise upon sensitive receptors in the vicinity of the development both during construction and operation.

2.13 Impact upon existing and permitted development

2.13.1 Existing Development

The proposed development passes within close proximity to a number of farm complexes, dwellings and other businesses, and would have the potential to have a detrimental impact upon the extension/addition of buildings to these properties. This potential for adverse impact is significantly increased as the provisions under Class 28 of Part 1 of Schedule 2 of the Planning and Development Regulations 2001 permits the deviance of the permitted route of an electricity line within an 80 metres wide corridor (40 metres to either side of the permitted route). The assessment of the potential adverse impacts in this regard is inadequate in the EIS.

2.13.2 Permitted Development

The proposed development passes within close proximity to / directly over a number of permitted developments such as permissions ref. 08/906, 08/907 & 08/1151 and also permitted development which has been recently constructed such as 06/527. The proposed development would also have the potential to have a detrimental impact upon the extension/addition of buildings to these properties. This potential for adverse impact is significantly increased as the provisions under Class 28 of Part 1 of Schedule 2 of the Planning and Development Regulations 2001 permits the deviance of the permitted route of an electricity line within an 80 metres wide corridor (40 metres to either side of the permitted route). The assessment of the potential adverse impacts in this regard is inadequate in the EIS.

2.13.3 Devaluation of property

As a result of the proximity of the proposed development to existing and permitted development there is the potential for the development to devalue property. The EIS has not addressed this issue.

2.13.4 Conclusion

The Environmental Impact Statement (EIS) has failed to adequately assess the impact of the development as proposed and also in respect of the repositioning of the proposed development under the provisions of Class 28 of Part 1 of Schedule 2 of the Planning and Development Regulations 2001 upon existing and permitted development.

2.14 Impact upon Roads

2.14.1 Assessment

The proposed development has impact upon the road system both during construction and in terms of maintenance. Consequently there is concern about the potential impact a project of this magnitude could have on a large number of local and regional roads in the County.

In particular there are concerns regarding the potential impact on the roads from the weight of construction traffic, the damaging effect that this will have, and the load bearing capacity of the roads to withstand this traffic. There are also concerns regarding the traffic and road safety capacity of the network to cater for the increased traffic during construction and the interaction of the construction traffic with other road users on the network.

In this regard, the submitted information is not sufficient to determine the impact of the development on the road network or to road safety in respect of the following;

- There are no details dealing specifically with the impact on local road network. The E.I.S outlined the construction traffic associated with the various national and regional road routes but does not provide any information on the impact of this additional traffic on local roads. It is considered likely that the increased volumes of HGV and construction traffic on these local roads during the construction phase that will have a significant impact on the operational safety of the road network and also on the current and residual structural capacity of these routes.
- There are no details or proposals for any potential road improvement works such as road widening, bend improvements or strengthening that will be needed to facilitate HGV and Construction traffic along any of the local road network or identified haulage routes.
- There are no details on any entrances/accesses from the public road that will be required for the erection of the towers, cables and associated works.
- There is limited information regarding the phasing of the project. This will have a bearing on the duration of impact for each public road affected by the construction phase.
- There are no details regarding Traffic Management for the construction phase.
- There are no details regarding current structural conditions of any roads that will be impacted upon by the project or any proposals to protect the integrity of these roads.
- There are no details of the traffic movements that will be needed for the haulage of spoil from the various sites or the haulage of materials for construction of temporary access routes and hard-standing or storage areas. No waste sites have been identified so additional roads other that those referred to in the EIS may be required and there fore will need to be considered in any current roads condition survey, which should include traffic impact and risk assessment and proposals to protect the integrity of the road structure.
- Some of the local roads identified on the proposed access routes will be incapable of taking construction traffic and in particular two way traffic. It is considered likely that alternative routes may be required in addition to those identified in the EIS
- No specific traffic management plans or method statements have been submitted for the stringing phase of the project or what impact this phase have on road users?
- There are no details outlining how the roads will be maintained during the construction phase.
- There are no details of how roads damaged as a result of the construction phase will be repaired and re-instated.

2.14.2 Conclusion

The Environmental Impact Statement (EIS) has inadequate detail in relation to routes used by construction traffic, facilitating works to allow construction traffic access, traffic management and reinstatement works.

The following information is required to fully consider the road safety aspects, capacity, maintenance, and capital cost for repair and reinstatement of roads affected by the proposed development;

1. The applicant should submit details of each local road that will be affected by the construction phase in a similar format to Table 13.4 of Volume 2B of the submitted EIS. The details should include Road Number, AADT, No. of Towers affecting each road, estimated duration of impact, estimated additional daily HGVs, estimated Daily light vehicles and percentage increase in traffic. From the information submitted it appears that the construction traffic volumes do not include additional of HGV movements that may be required for the construction of temporary works such as access and haul routes, hard-standing and storage areas.

Reason
The local road network will be severely affected during the construction element of the project. The local authority will need detailed information regarding the road network that will be affected by this development. There is ambiguity in the information submitted, for example it is proposed to construct 6 intermediary towers and 1 angle tower between towers 80 and 86. There are no details of how both LS07200 and LS07211 will be affected (eg are the towers to be constructed from one or the other or both?) This information will allow the local authority to assess impacts on the existing roads and identify the roads that will require a road condition survey that will have to be carried out by the applicant prior to the construction phase. It will also allow the local authority to examine the impact on the annual road restoration programme.

2. Applicant to submit a Preliminary Traffic Management Plan and associated risk assessment for all of the access routes along or adjacent to public roads that are associated with this project.

Reason
Section 13.4 of Volume 2b. Mitigation Measures states that a traffic management plan will be submitted by the contractor. However as the client under Health & Safety, the applicant will need to develop preliminary traffic management plans for the contractor. It is considered necessary to assess the preliminary plans at this stage so as to examine any impacts or risks that may be identified for road users.

3. Applicant should submit proposals of how the existing road network will be maintained/ protected during the construction phase of the project and what proposals the applicant has for long term restoration of the damage that may be caused to the road network by the proposed construction works required for the development.

Reason
The proposed volumes of heavy goods vehicles serving this development will cause damage to the existing road network. The local authority are of the opinion that details of how these roads will be maintained and protected from significant damage during the proposed 3 year construction phase should be submitted. The Planning Authority requires to know the applicants proposals for long term restoration of damaged roads after the scheme is completed as it is anticipated that significant road maintenance will be required during the construction phase of the development and that capital expenditure will be required for structural restoration of the road network on completion of the construction phase of the proposed development

4 (a) The applicant should submit site layout plans indicating how it is proposed to provide the minimum required clear and unobstructed visibility splays in each direction along associated public roads at the proposed entrance/access to the tower locations. The Monaghan County Development Plan 2007 – 2013, Section 8.12 sets out the minimum sight distance requirements for new access to public roads.

The required visibility splays should be measured in each direction along the public roads from a point 4.5 or 3 metres from the road edge at centre of proposed entrance at an eye height of 1.05 metre above ground level to a point measured to the nearside edge of the road at an object height of 1.05 metres above ground level. This information should be submitted on site layout plans at a scale of 1:500. The applicant should illustrate on site layout plans all necessary site works, including the extent of the front boundary hedgerow and trees proposed to be removed or cut/trimmed, or proposed removal/re-grading of side banks, proposed removal/relocation/lowering of fencelines/piers/walls etc to achieve these sight distances. Any pole, column, sign or other obstruction materially affecting visibility must also be highlighted as requiring removal or relocation behind the required sightlines. The area within the visibility splays shall be cleared to provide a level surface no higher than 250 mm above the level of the adjoining carriageway and shall be retained and kept clear thereafter.

4 (b) Where the required sight distances to the nearside road edge from proposed entrance locations are not achievable within the applicant's site area and land ownership, the applicant should submit appropriate legal agreements with the adjoining landowners. The legal agreements with adjoining landowners giving their consent to allow removal/relocation/lowering of their walls/piers/fenclines, removal/re-grading of their side banks, removal of their hedgerows/trees, regular cutting and trimming of their hedgerows/trees and maintenance of these hedgerows at all times in the future to provide the required sight distances shall be submitted to the Planning Authority. The legal agreement should be accompanied by an appropriate ordinance survey map on which the lengths of side banks to be removed/regarded, hedgerows/trees/walls/fencelines to be removed, hedgerows/trees to be cut and trimmed regularly and maintained at all times in the future should be marked. Both the legal agreements and accompanying maps should accompanied by a written legal agreement between the parties as required by paragraph 8.12 of the Monaghan County Development Plan 2007 - 2013.

4 (c) Applicant should submit a longitudinal section along the required sight lines in each direction from the proposed entrance locations onto the public roads to ensure that the required sight distances at an eye height of 1.05m to an object height of 1.05m above ground level are available along the entire existing vertical profile of the public road in each direction. Levels should to be taken at 5m intervals for the entire length of the associated sight lines.

4 (d) Applicant should submit drainage proposals for each proposed entrance location to prevent any surface water flowing from the access site on to the public road and similarly measures to prevent road surface water from flowing onto the entrance. This is to discharge to the nearest watercourse.

Reason
Details on traffic are covered in Chapter 13 Volume 2B of the EIS. In subsection 13.3.5 it is indicated that access to tower locations is proposed to be achieved by use of existing access tracks and field entrances no other details have been provided. A well designed access is important for the safety and convenience of all road users i.e. those proceeding along the public road and those using the entrance/access. When the Planning Authority considers proposals for a new access or the intensification of use of an existing access, it will normally have a number of requirements to promote safety and avoid excessive delays for capacity operation. These requirements are outlined above.

5. The applicant should submit details of all proposed road improvement works that may be required on the roads identified in point 1 above for the purpose of the construction phase. Proposed improvements may include road widening, removal of bends, passing bays or road strengthening. Where road improvements are proposed and where the required lands/property do not belong to the applicant, legal agreements with adjoining landowners giving their consent to allow the widening, removal of their fencelines/ hedgerows/trees to provide the required road improvement should be submitted. The legal agreement should be accompanied by an appropriate ordinance survey map on which the length of fenceline/hedgerows/trees to be removed and should be marked. It is recommended that both the legal agreements and accompanying maps should be signed by the applicant and landowner concerned and should be witnessed and signed/stamped by a solicitor.

Reason
The local authority will need to be aware of any proposed works that will impact on the public road network and the legal agreements will clarify that the applicant has the authority and consent to do work on third party lands.

6. Applicant to submit a detailed method statement of the stringing process that will take place traversing the public roads (including national as well a regional and local roads). The method statement shall take in to account the road to be crossed, length of time it will take, impact on existing traffic movements and road closures.

Reason
The local authority will require information on the potential impact the stringing process will have on existing traffic.

2.15 Waste Generation and Disposal

2.15.1 County Development Plan Policies

There is one principal policy relating to Waste Generation and Disposal in the Monaghan County Development Plan 2007-2013 relevant to the proposed development:-

WM 6 - Require all new developments to provide waste management facilities commensurate with their nature and scale.

2.15.2 Assessment

There will be significant amounts of material excavated to provide the foundations for the towers. No provision or assessment has been made in the Environmental Impact Statement (EIS) of the consequences of soil and sub-soil removal from each of the proposed tower sites. In addition, limited consideration has been given to the impact on the road network from the transport and disposal of this material. It is not adequate to leave this issue solely to waste permitting legislation when the excavation and disposal of large amounts of material is a fundamental part of the development. Project splitting will result if separate waste permit applications are the only consent system used for this large development. Consequently, the full nature and scale of the environmental impacts of the proposed Eirgrid development will not be assessed. The total impact of the excavations and consequent infilling / disposal elsewhere must be subject to the EIA Directive and included in the EIS.

The specific permitted disposal sites (under waste management act) relative to each site should be identified to minimise haulage and comply with regulations. All surplus material should be disposed of to permitted sites with permitted collectors. Both categories sites and collectors should be identified in each site specific plan.

2.15.3 Conclusion

The EIS contains inadequate information in relation to the scale of displaced material, the destination of disposal of displaced material, the impact of the disposal of this material at these locations, and the impact of the proposed development upon the local road network in relation to disposal of waste.

2.16 Impact upon Surface and Ground Water

2.16.1 County Development Plan Policies

There are three principal policies relating to Surface and Ground Water in the Monaghan County Development Plan 2007-2013 relevant to the proposed development:-

ENV 42 - Require best practice in the design, construction and operation of expanding and new developments to ensure minimum effects on the aquatic environment.

WM 7 - Adopt and use the Groundwater Protection Scheme as a planning tool.

WM 8 - Protect and improve water quality.

2.16.2 Assessment

Given the scale of the proposed development, it has significant potential to contaminate surface and to a lesser extent groundwater. The information submitted is insufficient to fully consider the impacts of the proposed development and the following information is required:-

1. The applicant should submit a site specific (i.e. each tower or storage area) construction plan detailing the method to ensure the protection of all waters to the site. This plan should include existing surface water channels and groundwaters and any receptor that may be interfered with. Details such as silt traps, surface water management tools such as settlement ponds, bunded storage arrangements, pumping (dewatering) criteria and temporary pipework if necessary should be shown. Location of domestic wells should be detailed. This plan should also detail access arrangement outside the proposed 80m corridor that potentially affect surface waters if site topography dictates. Additionally topsoil / subsoil storage layouts should be included and location of same shall mitigate against runoff.

2. There is limited information regarding the phasing of the project. This will have a bearing on the duration of potential impact for each watercourse affected by the construction phase. A detailed construction programme specific to each tower or storage site should be submitted. This programme should identify the duration the soil heaps, open excavations are exposed. It is recommended that they should be kept to a minimum to manage the risk of siltation of watercourses through runoff.

2.16.3 Conclusion

The Environmental Impact Statement (EIS) contains inadequate information in relation to the impact of the proposed development upon surface and ground water.

2.17 Impact on Tourism

2.17.1 County Development Plan Policies

There is one principal policy relating to Tourism in the Monaghan County Development Plan 2007-2013 relevant to the proposed development:-

TOU 8 - Protect the natural resources upon which tourism is based through the enforcement of policies in relation to resource protection (ENV8-25); Landscape Character Assessment (ENV1); Architectural Conservation Areas (ENV31); water quality (WM7-10 and ENV39-46); biodiversity (ENV22-24); rural housing (SP6, RH8/9, RD1-6) and holiday home development.

2.17.2 Context

Failte Ireland has long recognised that the future of Irish Tourism is inextricably linked to the quality of the environment. Our scenic landscapes, rivers and lakes, and cultural heritage are the bedrock upon which Irish Tourism has been built.

A recent survey conducted by Failte Ireland (September 2009) entitled 'Exploring the attitudes of holidaymakers towards the landscape and natural environment' highlighted the importance of the landscape in the decision-making process when choosing a holiday destination. The results show that:

67% of holidaymakers surveyed indicated that Cost/Value for money is one of the top factors when choosing a holiday destination.

50% surveyed stated that the next factor in terms of importance is landscape and the natural environment.

The importance of the landscape and environment in attracting tourists is especially true of County Monaghan. In the absence of flagship tourism attractions, the outdoor activity market – be it land-based or water-based, is one of the most important market segments for the county.

Product offerings in Co Monaghan under the outdoor activity market segment include activities such as:

- Angling
- Forest parks
- Walking
- Cycling
- Golf
- Equestrian

The promotion of Monaghan as a destination for such activities will be severely impacted by the proposed development, both in terms of visual impact and direct impact on certain activity providers, angling waters and way-marked walks.

Most recently, the unique character of the Monaghan landscape and its rural nature was highlighted in The Lonely Planet guide to Ireland which recommended counties Cavan and Monaghan for the following reason: *'Much of the attraction here is outdoors, making it a perfect place for visitors seeking an unspoilt corner of Ireland'.*

2.17.3 Existing tourism products directly impacted

Angling
Angling is a hugely important product and tourist attractor for Co Monaghan. The towns of Ballybay and Castleblayney are Centres of Excellence for angling and many fishermen base themselves in this general lakelands area. Listed below are the important angling waters lakes which will be directly impacted by the proposed development:

Lough Egish This 117 hectare lake is a valuable Pike Fishery.
Lough Morne This 45 hectare lake is a good game fishery and contains brown trout.

The general amenity value of the Castleblayney-Ballybay lakelands area may also be detrimentally impacted by the proposed development.

Examples of lakes in the general vicinity of the proposed line include:

Corlatt Lake/Shantonagh Lake
These series of lakes drain into the Knappagh River and the River Annalee. It must be noted that the majority of these waters contain most of the coarse fish species with the exception of bream and tench but are regarded as very good pike fisheries.

Tonyscallon Lake
This lake covers an area of approximately 3 hectares and contains very good bream.

Walking
The Monaghan Way is a long distance walking route from Monaghan to Inniskeen. It is a stimulating combination of quiet country roads, cross country trekking, riverside walkways and lakeside approaches. Reflecting the Monaghan countryside, the walk mixes gentle sloping hill gradients with flat stretches of open countryside. There are no long or steep climbs and the route reaches a maximum altitude of 317m at the summit of Mullyash.

The proposed development will directly impact on a large section of this route.

Tourism Providers
Examples of tourism providers directly impacted by the proposals include:

Mourne Clay Pigeon Shooting
Shenandoah Stables
A Healthy Choice Spa & Clinic

2.17.4 Potential impact on future tourism developments

A number of tourism development projects for Co Monaghan have recently been worked up and submitted for funding to several implementing agents. These project proposals include the development of Lough Muckno Leisure Park as a major Eco-Tourism Centre, the development of amenity infrastructure along the Ulster Canal in Clones, the provision of walking trails in Dartrey Forest, habitat restoration, improvement of access and enhancement of infrastructure at angling waters throughout the county etc.

The rationale for all these proposals and the overall strategic aim for tourism development in County Monaghan is to exploit and showcase the County's environmental and rural culture assets. This is the county's key strength.

2.17.5 Conclusion

Landscape and the natural environment are important in respect of tourism and the quality of these two elements are significant in attracting tourists to County Monaghan. The proposed development has the potential to severely impact upon tourism in County Monaghan in general, but also in respect of individual tourist attractions in close proximity to the proposed development. The EIS has failed to properly take account of the impact of the proposed development upon tourism.

2.18 General Development Contributions

It is asserted in Section 2.9.1 of Volume 1 of the Environmental Impact Statement that general development contributions levied under Section 48 of the Planning and Development Act 2000 are not applicable as this Section 48 refers only to instances where a development is being granted permission by planning authorities under Section 34 of the Act. However, Section 182D(5) of the Planning and Development (Strategic Infrastructure) Act 2006 permits An Bord Pleanala to attach to an approval such conditions as it considers appropriate.

The appropriateness of levying general development contributions on the proposed development is also questioned in Section 2.9.1 of Volume 1 of the Environmental Impact Statement. In 2008 the Planning Authority produced a development contribution scheme under Section 48 of the Act. It is considered appropriate that the developer pays development contributions in accordance with this scheme.

This position is supported by the recent decision by An Bord Pleanala under Section 37G of the Planning and Development (Strategic Infrastructure) Act 2006 in respect of the Gas Powered Electricity Generating Station at Toomes, Co. Louth (ref. PL 15.PA0001). In this decision An Bord Pleanala attached a condition (no.19) to the permission requiring that the developer pay general development contributions to both Monaghan County Council and Louth County Council in accordance with their respective development contribution schemes made under Section 48 of the Planning and Development Act, notwithstanding the fact that it was not granted under Section 38 of the Act.

The level of general development contribution in respect of the provision of Community, Recreation and Amenity Infrastructure applicable to this proposed development is as follows:-

Category	**Development**	**Amount of Contribution**
5. Provision of Community, Recreation and Amenity Infrastructure	(n) The provision of overhead transmission or distribution lines for conducting electricity, or overhead telecommunication lines.	€20,050 per Tower €200,510 per Tower carrying power 400Kv or above

2.19 Special Development Contributions

As stated in 2.14 above, it is asserted in Section 2.9.1 of Volume 1 of the Environmental Impact Statement that development contributions levied under Section 48 of the Planning and Development Act 2000 are not applicable as the development is not being granted permission by a planning authority under Section 34 of the Act. However, Section 182D(5) of the Planning and Development (Strategic Infrastructure) Act 2006 permits An Bord Pleanala to attach to an approval such conditions as it considers appropriate.

In this instance the proposed development will use the public road network for the delivery, construction and maintenance of the development. The traffic associated with the construction and long term maintainence/renovation of the development will have a detrimental impact upon the public road network which has been provided by the local authority. Therefore, the developer is obliged under Section 48 of the Act to pay a special development contribution in respect to the provision of public infrastructure.

This position is supported by the recent decision by An Bord Pleanala under Section 37G of the Planning and Development (Strategic Infrastructure) Act 2006 in respect of the Gas Powered Electricity Generating Station at Toomes, Co. Louth (ref. PL 15.PA0001). In this decision An Bord Pleanala attached a condition (no.20) to the permission requiring that the developer pay special development contributions to both Monaghan County Council and Louth County Council under Section 48(2)(c) of the Planning and Development Act in respect of local road improvements and re-instatement associated with the construction of the proposed development.

In the absence of details of requested in section 2.14.2 of this submission, the amount of special development contributions cannot be calculated at present.

2.20 Community Gain Fund

Section 182D(6) of the Planning and Development (Strategic Infrastructure) Act 2006 permits An Bord Pleanala to attach to an approval a condition relating to "*the construction or the financing, in whole or in part, of the construction of a facility, or the provision or the financing, in whole or in part, of the provision of a service in the area in which the proposed development would be situated, being a facility or service that, in the opinion of the Board, would constitute a substantial gain to the community*."

This position is supported by the recent decision by An Bord Pleanala under Section 37G of the Planning and Development (Strategic Infrastructure) Act 2006 in respect of the Gas Powered Electricity Generating Station at Toomes, Co. Louth (ref. PL 15.PA0001). In this decision An Bord Pleanala attached a condition (no.22) to the permission requiring that the developer pay special development contributions to both Monaghan County Council and Louth County Council under Section 48(2)(c) of the Planning and Development Act in respect of local road improvements and re-instatement associated with the construction of the proposed development.

It is considered reasonable that the operators of the facility should contribute towards the cost of environmental, recreational or community facilities which will be of benefit to the community in the area.

2.21 Major Incident Provisions

2.21.1 County Development Plan Policies

There is one principal policy relating to Major Incident Provision in the Monaghan County Development Plan 2007-2013 relevant to the proposed development:-

MAD 1 - Facilitate the implementation of the “Seveso II” major accidents directive and in doing so the Council will have regard to major infrastructure projects

2.21.2 Assessment and Conclusion

The Environmental Impact Statement (EIS) has failed to make reference to any potential impacts or mitigation measures relating to structural failures in either the towers or the conductor lines and the resulting impact upon adjoining properties and sites of bio diversity.

2.22 General Comments

2.22.1 Micro Siting

It is noted that reference is made to “Micro siting” which is based on the provisions of Class 28 of Part 1 of Schedule 2 of the Planning and Development Regulations 2001 which permits the deviance of the permitted route of an electricity line within an 80 metres wide corridor (40 metres to either side of the permitted route). It is considered that inadequate consideration has been given of the impact of the construction of the line any where within this corridor, particularly as a deviation of 40 metres in any direction could represent a significant change in both base level and height of the towers.

2.22.2 Temporary Works

There is very limited information provided in relation to location and extent of temporary access tracks, particularly in proximity to sites of biodiversity and scenic routes.

2.22.3 Flood Risk Assessment

Limited consideration has been given in the Environmental Impact Statement (EIS) in relation to flood risk, particularly in respect of the disposal of excavated material.

2.22.4 Transboundary Implications

Between towers 120 and 121 the line crosses into Northern Ireland and thus would require permission in that jurisdiction. However, the Environmental Impact Statement (EIS) has not made any reference to this fact. In addition, the micro siting of the line has the potential to result in the crossing of the border into Northern Ireland at further locations and no consideration has been given to this fact. The proposed development is likely to have cross border impact and therefore should be considered as a transboundary development. The EIS has failed to fully consider the impacts of the proposed development in this regard.

3.0 Comments by Elected Members

3.1 Background

The comments below represent the views of the elected members of Monaghan County Council and have been collated following the discussion of the proposed development by both the elected members of Monaghan County Council and a sub committee of the elected members.

3.2 Impacts Upon Health

The Draper Report (source: British Medical Journal 4 June 2005) in its study of incidents of childhood leukaemia in Britain, found that there was a 50 greater chance of a child developing leukaemia if they were living within 100 metres of overhead high voltage power lines.
The 2007 Health Services Executive Report into the effects of electro magnetic fields has yet to be published. The findings of this study needs to be placed in the public domain and debated prior to the determination of this application. An Bord Pleanala should insist that the report is accessible displayed in public, debated and its findings implemented prior to the determination of this application. The European Union has specified an accepted limit of 100 micro tesla, but some European countries have limits as low as 10 micro tesla or lower. The proposed development will have and electro magnetic field strength in the region of 70 micro tesla.
The Bio Initiative Report – A Rationale for a Biologically based Public Exposure Standard for Electromagnetic Fields (ELF and RF) (source: www.bioinitiative.org) examined issues such as standards regarding magnetic fields, causes of childhood cancers, reactions to magnetic fields, and the precautionary principle. This report concludes that it is no longer acceptable to place power lines in certain areas.
The HSE submission to Eirgrid at pre application stage should be addressed in the Environmental Impact Statement (EIS). Eirgrid have not carried out any research into the matter apart from considering the reports carried out by the World Health Organisation. Eirgrid has not conducted any research of its own into the effects on health.
The protection of health and well being of the people of County Monaghan is the primary concern of the electorate and thus is a major consideration for the elected members of the Council. However, there are grave doubts that the proposed development will have an adverse affect on health.
The precautionary approach should be taken and therefore the proposed development should be refused.

3.3 Social Impacts

The proposed development will result in the devaluation of land, adverse impact on property, the taking of land, the sterilisation of an 80 metre corridor, the division of land, and the creation of a physical barrier. In respect of small farms the 80 metre corridor could incorporate the entire landholding.
The proposed development will also restrict the development of sites for dwellings for family members of land owners.

3.4 Monaghan County Development Plan 2007-2013

The County Development Plan 2007-2013 contains a number of specific policies which are relevant to the proposed development:-

ENV 1 - Prepare a County Landscape Character Assessment in accordance with the requirements of Landscape and Landscape Assessment Consultation Draft Guidelines for Planning Authorities, DOELG, June 2000.

ENV 2 - Protect the landscapes and natural environments of the county by ensuring that any new developments in designated sensitive rural landscapes do not detrimentally impact on the character, integrity, distinctiveness or scenic value of the area.

ENV 3 - Sustain, conserve, manage and enhance the landscape diversity, character and quality of the County for the benefits of current and future generations.

ENV 8 - Limit development in Areas of Primary Amenity Value to those where the applicant has proven to the satisfaction of the Planning Authority that the proposed development would not threaten that the proposed development would not threaten the integrity of these areas.

ENV 10 - Limit development within Areas of Secondary Amenity Value to compatible amenity developments on unobtrusive sites.

ENV 14 - Protect the views from scenic routes listed in Appendix 2, Scenic Routes. Development will be strictly controlled along these routes and no development will be permitted that will be detrimentally impact on the visual character or amenity of these views. Particular emphasis will be placed on the preservation of views of lakes, rivers, unspoilt landscape or views of historical, heritage and/or cultural interest.

ENV 15 - Protect the scenic quality of lakes by prohibiting development which is located between a public road and a lake, where the development would interrupt a view of the lake, or detrimentally impact on the setting of that lake. Development may be permitted between a road and a lakeshore where the development is screened from the lake by existing topography or vegetation.
An exception to this policy may include short term let holiday accommodation or recreational development where a specific need has been established. The design, scale and setting of development granted under this exception should reflect the site's sensitive location.
For the purpose of this policy a lake is considered to be a permanent (i.e. non seasonal) water feature in excess of 1 hectare.

ENV 17 - Protect trees and hedgerows from development that would impact adversely upon them.

ENV 18 - Preserve trees and/or groups of trees that form significant features in the landscape or have particular importance in setting the landscape character of an area or which contribute to the biodiversity of the area (Appendix 3, Trees of Special Amenity Value)

ENV 22 - To protect, enhance and promote for current and future generations the rich biodiversity of County Monaghan.

ENV 23 - Protect and enhance, plant and animal species and their habitats, which have been identified under the EU Habitats Directive, EU Birds Directive, the Wildlife Act and the Flora Protection Order.

ENV 24 - Promote the management and development of wildlife features such as hedgerows, riparian corridors and wetlands that are essential for the migration, dispersal and genetic exchange of wild species

ENV 27 - Protect and / or conserve, as appropriate, all structures included in the Register of Protected Structures set out in Appendix 5

ENV 28 - Resist development which is likely to adversely affect the setting of a structure included in the RPS, where the setting is considered of importance.

ENV 34 - Safeguard the value of archaeological sites listed in the RMP, Appendix 6 by strictly controlling any development that may prove injurious to the historical, archaeological, scientific and/or educational value of any monument or place.

ENV 35 - Protect the monuments and places listed in Appendix 6 to ensure that the importance of the setting of the monument or site, and its interrelationship with other archaeological sites is not materially injured, and that no development will impinge directly on any monument or site or on any associated archaeological material.

ENV 36 - Co-operate with the Department of the Environment, Heritage and Local Government and all other relevant bodies in providing maximum protection to any monument or place of archaeological importance not listed in Appendix 6 and discovered within the lifetime of this plan.

ENV 37 - Encourage archaeological investigations at pre-approval stage where development is proposed on areas of archaeological potential.

ENV 38 - Consider archaeological value when considering proposals for public service schemes, electricity, sewage, telecommunications, water supply and proposed road schemes where these impinge on or are in close proximity to Recorded Monuments and Places and/or Areas of Urban Archaeology.

ENV 42 - Require best practice in the design, construction and operation of expanding and new developments to ensure minimum effects on the aquatic environment.

ENV 47 - The Planning Authority will seek to protect the amenity of individuals, dwellings, businesses, community facilities and other existing development, when assessing proposals for development that are likely to generate significant levels of noise.

WM 6 - Require all new developments to provide waste management facilities commensurate with their nature and scale.

WM 7 - Adopt and use the Groundwater Protection Scheme as a planning tool.

WM 8 - Protect and improve water quality.

TOU 8 - Protect the natural resources upon which tourism is based through the enforcement of policies in relation to resource protection (ENV8-25); Landscape Character Assessment (ENV1); Architectural Conservation Areas (ENV31); water quality (WM7-10 and ENV39-46); biodiversity (ENV22-24); rural housing (SP6, RH8/9, RD1-6) and holiday home development.

TOU 14 - Support agri-tourism in the form of on-farm visitor accommodation and supplementary activities such as health farms, heritage and nature trails, pony trekking and boating; ensuring that all built elements are appropriately designed and satisfactorily assimilated into the landscape (AG5).

The proposed development contravenes a number of specific policies in Monaghan County Development Plan and will have an unacceptable detrimental impact on the county.

3.5 Incomplete Environmental Impact Statement

The EIS is incomplete / sub-standard and the application should be refused on this basis. The technical assessment incorporated within this submission demonstrates that the EIS is insufficient and inadequate.
The documentation submitted with the application states that access to lands to carry out the study was prevented. However, Eirgrid were not refused access when preparing the Constraints Report. Eirgrid had the opportunity to carry out an Environmental Impact Assessment on the three corridors, but never asked for any access to the lands.There was limited access to land to conduct the Environmental Impact Assessment, but there was no significant change from the preliminary EIS Constraints Report published in April 2008. Eirgrid's comments that access to the lands was restricted demonstrates that a full and proper on site assessment in relation to the EIS could not have been carried out.

3.6 Balance Between National And Local Issues

The application for the proposed development makes no mention of the need to balance strategic issues with local impacts as required by the Government's White Paper on Energy.

3.7 Visual Impact

No Zone of Visual Impact has been included within the EIS. The lack of a ZVI is sufficient basis to refuse the application. This omission highlights a lack of any concern that this application is going to be taken seriously by An Bord Pleanala.
The photomontages included within the EIS are inadequate and misleading. The photograph taken of Lough Major which is an Area of Secondary Amenity, does not demonstrate the full visual impact of the proposed development. There is concern that trees have been superimposed on photographs at views 18, 19 and 21.

3.8 Impact Upon Lakes

Insufficient information has been included within the EIS in relation to the impact upon lakes, specifically a number of lakes which have been identified as being fishing lakes and tourist attractions. The impact of the proposed development on these lakes has not been properly considered. Fishing is a popular pastime, and angling is a significant tourist attraction to Monaghan. Lakes are also an important amenity. In addition the areas along the edge of lakes has an abundance of flora and fauna, and the impact of the development upon this has not been considered.

3.9 Impact Upon Places of Employment and Habitation

Places of employment have not been included in the assessment of the proposed development. The HSE submission to Eirgrid, mentions the need to consider places of habitation and employment. Places of employment close to the lines have not been considered and planning permissions after 2005 or new buildings have not been referred to.

3.10 Impact on Tourism

The proposed development will pass in close proximity to a number of tourist attractions/destinations within County Monaghan such as the site of the Battle of Clontibret, a number of ring forts, a number of lakes/fisheries, riding centres and a shooting range. This has not been considered in the EIS.

3.11 Consideration of Alternatives

The Ecofys Report commissioned by the Minister of Energy, Communications and Natural Resources, stated that it was technically possible to provide underground transmission of electricity. Underground technology is rapidly developing and what is currently emerging is the most advanced method of electricity transmission at the moment. However it cannot be monitored until the development is in place. Questions over reliability of undergrounding are based only on assumptions. The report stated "*At the very least, this technology should be used in part of this project in order for the technology to be research and monitored*." The undergrounding of the proposed development would promote the green image of Ireland. The undergrounding of the development is also an opportunity for Ireland to be a world leader in research and could attract research/development funding from Europe. Underground electricity transmission technology will advance significantly in the next two years prior to the anticipated construction of the development. The proposed development should be placed underground. In addition, the EIS does not provide a coherent justification as to why route has to go through County Monaghan.

3.12 Impact on Forestry and Agriculture

The proposed development will place constraints on the afforestation of land. Policy AG2 of Monaghan County Development Plan 2007-2013 specifically requires the protection of high quality agricultural land. The proposed development will also limit the ability of farmers to diversify.

3.13 Devaluation

The value of land and houses alongside the corridor will be decimated. While it is less costly to construct the transmission line overground, this method fails to take account of the loss to property owners and the community. Ultimately the net cost of the development is being shifted from Eirgrid to landowners and the community as a result of the proposal to place the development overground as opposed to underground.
The Government's White Paper on Energy refers to a balance between strategic issues and local interest. Although the owners of property where the pylons are to be located will be compensated, those property owners over which the line passes and adjoining property owners will not be compensated. There should be compensation for property owners within the vicinity of the proposed development. There is devaluation of property that is not directly affected by the proposed development.

3.14 Transboundary Impacts

The proposed development will have cross border impact and therefore should be considered as a transboundary development.

3.15 Micro Siting

The principle of micro siting necessitates the extension of Environmental Impact Assessment to an 80 metres corridor. The scale and shear mass of the pylons means that to have the ability to locate them 40 metres either side of the proposed line could have a major impact on all of the issues considered in the EIS. This ability to deviate the line of the proposed development to this extent is not acceptable in this type of large scale project.

3.16 Impact Upon Heritage

The heritage of the county must be protected. The impact of the proposed development has not been fully assessed in respect of ecology, habitats, archaeology, and architectural heritage.

3.17 General Comments

At a pre-application meeting between Eirgrid and An Bord Pleanala on 11th July 2007 it was stated that route A was the preferred option. However, at every public discussion until Spring 2009 Eirgrid led the public to believe that three routes were still being given consideration.

3.18 Conclusion of Elected Members

The elected members of Monaghan County Council are not against progress or the improvement of infrastructure. However, the elected members consider that the proposed development will have a profound adverse effect on the county. The EIS submitted with the application is considered to be wholly inadequate and inaccurate, and has failed to fully and properly assess the impact of the proposed development upon the county. It is accepted that this is an important project, but the elected members consider the proposal in its current format to contravene the policies of the Monaghan County Development Plan 2007 - 2013. As a consequence the elected members of Monaghan County Council submit that the development as proposed be refused.