

Cullenagh
Portlaoise
Co Laois
15th March 2013

An Bord Pleanála,
64 Marlborough Street,
Dublin 1

Case reference: PL11.VA0015



Dear Sir/ Madam,

I wish to make a submission on Eirgrid's planning application for Laois-Kilkenny Reinforcement project with case reference PL11.VA0015. In summary, the planning report does not outline a compelling justification for this project or a strong reason for why the project is required in this location. It does not demonstrate that alternative options have been given any serious consideration. The consultation process has been opaque and details of this development have been masked throughout the process with the full extent of the scale of the project only becoming apparent on publication of the planning report. Impacted local residents have been drip fed information throughout this project in a partial and incremental manner and as a result have not been permitted to participate in the environmental decision making process.

Most concerning, is the unexplained significant redundant capacity that is contained in the application. Utilisation or future potential plans for this spare capacity have not been disclosed, have not been shared with the public and have not been part of the consultation process.

In particular, I would like to raise the following concerns:

Project Justification and location of substation

1. Project Justification: In the Stage 1 consultant's report from ESBI the project is justified on the basis of a) quality of supply to the Kilkenny region and b) security of supply to Kilkenny city. The Development report in section 2.3 changes b) to quality of supply to the wider Kildare, Carlow and Kilkenny region.
 - Why does the planning report not support the consultant's report for the justification of the project?
 - There is a clear inconsistency here regarding the overall justification for the project.
2. Security of Supply justification: The planning report states that due to fluctuations in demand that security of supply to Kilkenny is not a key driver but that security of supply will become an issue at some stage in the next 10 to 20 years although this is difficult to predict. Page 9 states "Based on the uncertainty of when the third circuit would be required, this driver does not now present the same urgency

as before; however it is important to understand that it will still emerge in time.” This is hardly a sound basis for planning a development of this scale. Also, the costs of maintaining this redundant capacity until it is required given that security of supply is not an immediate concern does not appear to have been taken into consideration in the reasoning for deciding on option 1 as the preferred approach in section 2.5.

3. Section 2.5 states that “Option 1 is preferred to Option 2 as it involves the least new circuit length and adds the greatest amount of spare network capacity for future growth.” There is no cost-benefit analysis or other assessment of option 1 v option 2 in the planning report nor in the consultant’s stage 1 report.
4. Justification for location of substation in Coolnabacky, Timahoe: The geographic location of the substation is based around three anchors; the Moneypoint-Dunstown 400KV line, Portlaoise-Athy 110KV line and the Ballyragget substation for onward connection to Kilkenny City. In section 2.4 there are four options outlined for Kilkenny security supply, with Option 1: connection from Coolnabacky being chosen over Option 2: 220/110 kV injection at the existing Dunstown 400/220 kV station. This is on the basis of lower capital costs and shorter cabling distance.

In section 3.4, it states that “During this Stage 3, it was confirmed that the majority of existing structures along the Ballyragget-Kilkenny Overhead Line would have to be replaced to upgrade the line to 110 kV technical standards.”

- Were the options in section 2.4 revisited when this information came to light?
 - The planning report contains no evidence that this new requirements was taken into consideration when option 1 was chosen above option 2. A significant assumption at the outset of this project has been proved wrong and there is no evidence that the decisions driven by this assumption have been re-considered.
5. Option 1 was chosen as it required only 30Km of 110kV cabling compared to 59km for option 2. There was no difference in network efficiency between option 1 and option 2. So a brief overview of what is required in the two options after you include the upgrade of the Ballyragget –Kilkenny line are outlined below

	Option 1	Option 2
New Line	30Km	59Km
Replacement of majority of structures on Ballyragget-Kilkenny line	34Km	N/A
New Substation	Significant new build of a substation at Coolnabacky, Timahoe	N/A
Upgrade of existing substations	Ballyragget: development of a new 110/38kV/MV substation in Ballyragget, Co. Kilkenny, adjacent to the existing 38 kV/MV substation; New Bay in Kilkenny substation	New 110 kV busbar and the addition of a 220/110 kV transformer in Dunstown substation
Decommissioning work	Decommission the	N/A

	Ballyragget 38Kv/MV substation	
--	-----------------------------------	--

Just a very basic analysis would suggest that option 2 would be more cost effective. However, the report states "Option 1 is preferred to Option 2 as it involves the least new circuit length and adds the greatest amount of spare network capacity for future growth."

So the real justification for this project seems to be to add spare network capacity for future growth. However, it does not state anywhere in the planning report why spare capacity would be required. On the contrary, it states that:

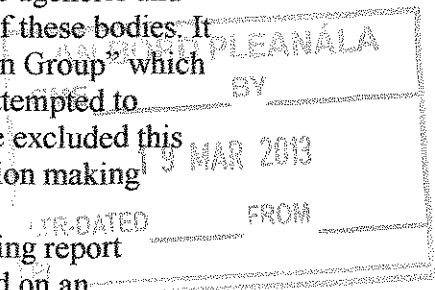
- Quality of supply issues would be equally addressed by option 1 and 2.
- Security of supply in Kilkenny will not be a concern for 20 odd years without this development and by inference for a much longer period with either option 1 or 2.
- The stage 1 consultant report states that "concerns relating to security of supply primarily affects Kilkenny substation and are not a direct issue for Portlaoise substation". So spare capacity is not required in Portlaoise.

Option 1 has been chosen because it adds extra network capacity however the report clearly states that extra network capacity is not required on the transmission network in this region for the foreseeable future.

6. The most significant concern is the redundant capacity that is planned for the substation at Coolnabacky. There are connections for another 2 x 400kv and 3 x 110kV in the Coolnabacky substation as well as enough space to build additional capacity. This would facilitate major new line infrastructure in this region and this should be clearly outlined in the planning report. However, this is not in this planning report and it is not acceptable that strategic infrastructure projects are disclosed in an incremental basis as this application is attempting.
7. The two spare 400KV connections in the Coolnabacky substation will require a new 400KV line to another 400KV substation. This would necessitate a 400kv line of greater than 15km in length. A line of this length requires an Environmental Impact Assessment as outlined in annex 1 of EU Directive 2011/92/EU. It is not reasonable to state that the impact can be assessed when this new line is planned, as the impact of this project needs to be considered in its full entirety and not just on an incremental basis.
8. There are strong indications that this extra capacity is to facilitate new wind generation capacity in this region. This is not part of the planning report and has not been part of the consultation process. The justification for this project does not site connection to new generating capacity as a driver or indeed identify any need for new generation capacity in this project.

Consultation

9. The consultation section of the reports carefully outlines the state agencies and other bodies that it has met and how it addresses the concerns of these bodies. It does not mention the "Ratheniska, Timahoe and Spink Substation Group" which represent the concerned public in these areas. Eirgrid have not attempted to address the concerns of this group through consultation and have excluded this group, which represent the public, from the environmental decision making process.
10. Similarly, the public consultation meetings outlined in the planning report disclosed only very high level information and this was disclosed on an



- incremental basis meaning that members of the public had to attend many meetings in order to have any understanding of the impacts of this project on them.
11. There is no assessment or survey of the impact on people impacted by the decision to choose option 1 over option 2 and no public participation in this decision.
 12. The new lines connections that will be possible due to the spare capacity have not been outlined in the consultant's report, planning report or in the consultation process. The public have not been involved in the decision making process for the lines connecting to this spare capacity.
 13. Underground consideration: Underground cabling has been ruled out as they do not meet Eirgrid's policy criteria.
 - Has a Strategic Environmental Assessment been undertaken on this policy?
 - Have the public been involved in the decision making process?
 - How does this policy comply with the Aarhus Convention?
 14. No serious consideration has been given in the report to undergrounding the connections from the existing 400kv line to the substation despite being suggested by local residents. Again the public have not been allowed participate in this decision making process.


Other Concerns

15. Suitability of the site at Coolnabacky, Timahoe. This site is in a completely rural location and an industrial development of this scale should be restricted to an industrial area. Permitting industrial scale developments in rural areas has a significant visual impact on our rural landscape.
16. A development of this scale in a rural and environmentally sensitive area, close to historic eskers and watercourses should be subject to an Environmental Impact Assessment and meets most of the criteria for an EIA.
17. Planning Report: The basis for option decisions on costs is not transparent in the report and does not outline how it accounts for social costs nor downstream economic opportunity costs.

Overall, this project is based on a weak and inconsistent justification that lacks robust analysis. The report contains a number of inconsistencies and the justification of the project appears to be primarily based on adding extra network capacity. However one can clearly conclude from the planning report and the consultant's report that extra capacity is not needed for transmission for the foreseeable future. The significant redundant capacity in the substation means that future unplanned lines or generation will connect to this site. The lack of transparency and completeness in this application makes it impossible to understand the full impact of this development and impossible for me as a member of the public to understand what this project means. This application attempts to justify significant extra capacity in an area where this capacity by the reports own admission is not and will not be required.

I call on An Bord Plaenala to reject this application outright.

Yours sincerely



Seamus Fingleton



Cullenagh,

Portlaoise

Co Laois

13/03/2013

Ref: PL1 .VA0015

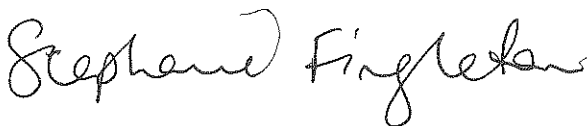
Dear Sir/Madam,

I wish to make a submission on Eirgrid's planning application with ref: PL11 .VA0015. I was born and grew up in rural New South Wales and moved to Laois with my Irish husband approximately 2 years ago. We hoped to raise our children in a peaceful rural surrounding similar to the one I grew up in. The sense of community is also important to me.

I am extremely distressed to suddenly learn that there are plans for a gigantic industrial scale electricity substation a few kilometres from our home. I have concerns that this will cause a proliferation of new power lines in our area and will destroy the tranquillity that we moved to the country for. I am concerned that this development will facilitate massive wind turbines in this area and that we will not be able to live in our home. I am distressed by the sense of fear and distrust felt in the community in relation to the broader development.

I have not been consulted on this project to date and don't feel like I have had any say in this process. I have actively sought information about the broader energy project and the purpose of the sub station, the response has been evasive. This is an industrial scale development and needs to be situated in an industrial area. I am concerned with the size of this development.

Yours sincerely



Stephanie Fingleton

