

Villierstown Education & Culture Project Ltd
Villierstown
Cappoquin
Co. Waterford

The Grid Link Project Manager
EirGrid
PO Box 12213
Glenageary
Co. Dublin

November 20th 2013

Re: Grid Link - Proposed 400 kV Leinster - Munster Connector

Dear Sir / Madam,

I write on behalf of the Villierstown Education & Culture Project Ltd (VECP). The VECP objects to the possible routing of the Grid Link connector over the Blackwater River SAC, the Blackwater Estuary or Blackwater Callows SPAs. This objection includes, but is not limited to, proposed corridors K11, K16, K21 and K22.

We would like to make the following specific points with regard to the proposed routes K11, K16, K21, and K22:

- 1. EirGrid's inclusion of these routes contravenes both EU and national environmental legislation (namely the EU Habitats Directive 92/42/EEC which was transposed into Irish Law by the Natural Habitats Regulations, 1996).**

The site of the proposed routes would cross the river Blackwater within a Special Area of Conservation and between two Special Protection Areas. Under the regulations governing the management of such areas:

"Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives...national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned, ..."

Given the nature of the proposed development, we do not believe that EirGrid has yet met, or will in future be able to meet, the requirement that "it will not adversely affect the integrity of the site"

- 2. The proposed routes K11, K16, K21 & K22 would have serious negative impact on several species classed as “qualifying interests” of the Blackwater SAC and the Blackwater Estuary and Blackwater Callows SPAs.**

The possible proposed crossing points (K11, K16, K21 & K22) have high potential for negative impacts on the conservation objectives of the Natura 2000 sites (SAC and SPAs) in the Lower Blackwater Valley. Section K21 has the greatest potential for damaging impacts on the Blackwater SAC, which it crosses in four separate locations and on the nearby SPAs.

- 3. There has been inadequate public consultation leading up to the selection of the current proposed route corridors. This contradicts EirGrid’s claim that public consultation had a vital role to play in the Grid Link route selection process.**

An examination of Grid Link’s Stage 1 and Constraints Reports indicates:

- EirGrid has acknowledged that it did not advertise in local papers in Dungarvan, County Waterford – the town closest to the relevant Blackwater SAC and SPAs.
- In part because of this inadequate public consultation, route corridor alternatives have been identified with insufficient information on constraints.
- Route corridor options have not been adequately explained and there is a general lack of transparency in the Stage One Consultation documents on the route corridor identification process.

As a result of EirGrid’s failure to place advertisements in the Dungarvan Leader and Dungarvan Observer a large portion of the affected community were deprived of the opportunity to participate at an early stage, “*when all options were open.*” EirGrid thus narrowed its choice of preferred routes without the benefit of “*effective public participation*”.

4. The proposed Grid Link routes would violate Waterford's County Development Plan.

The Waterford County Development Plan 2011-2017 makes clear that the proposed route corridors K11, K16, K21 & K22 fall in areas designated as either "Vulnerable" or "Sensitive" in terms of their capacity to absorb development. Areas designated as "Vulnerable" include the banks of the Bride and Blackwater Rivers.

The Plan concludes that such vulnerable areas "have an extremely low potential to absorb new development without causing disproportionate visual impacts."

Of the four alternative routes, K16, K21 & K22, would have the greatest "impact on high amenity areas." "Impact on high amenity areas" are deemed by EirGrid itself (in its Constraints Report) to constitute a '*primary*' constraint to route corridor selection, and therefore these are route corridors that should be avoided.

The above points demonstrate the validity of our objection to the proposed Grid Link route corridors across the Lower Blackwater at K11, K16, K21, and K22.

We would sincerely hope that you will take these factors into consideration before proceeding any further with this Project.

Please confirm receipt of this submission to the address at the top of the first page of this letter.

Yours sincerely,

John Lombard
Villierstown Education & Culture Project Ltd