



Strategic Infrastructure Section
An Bord Pleanála
64 Marlborough Street
Dublin 1

Via email sids@pleanala.ie

6th September, 2021

Dear Sir/Madam

Re. Proposed Celtic Interconnector Project – EirGrid and RTE (France)

The Heritage Council welcomes the opportunity to provide an observation on the proposed development as submitted by EirGrid plc. working in partnership with RTE in France. The Heritage Council acknowledges that the proposed interconnector has been designated as a Project of Common Interest (PCI) by the European Parliament and the European Commission.

We would wish the following matters to be considered as part of the overall assessment and decision-making process:

1. Landscape and Landscape Visual Impact Assessment (LVIA)

Whilst it is commended that the EIAR focuses on the County Cork Landscape Character Assessment (LCA), it is noted that the proposal is unable to use the national landscape character assessment (NLCA) or regional character assessment (RLCA) maps as they do not exist despite the National Landscape Strategy being launched back in 2015. As per previous Heritage Council submissions to the Board, it is recommended that An Bord Pleanála highlights this significant policy gap to the Department of Housing, Local Government and Heritage.

In the meantime, we would recommend that the application and assessment process make reference to Transport Infrastructure Ireland's recently published guidance from December 2020, entitled, *Landscape Character Assessment (LCA) and Landscape and Visual Impact Assessment (LVIA) of Specified Infrastructure Projects - Overarching Technical Document*.

<https://www.tii-publications.ie/library/PE-ENV-01101-01.pdf>.

In addition, it is recommended that the proposal references the recently published draft Regional Seascape Character Assessment for Ireland Report and the relevant seascape character types and character areas for the landfall area, which is part of the emerging Maritime Spatial Planning (MSP) framework in Ireland - part of the EU Directive 2014/81/EU.

In relation to the proposed colour of the main converter station, the Heritage Council acknowledges the proposed earthy colour tone pattern. We would further recommend that the proposed colour links to the dominant features and components of the relevant landscape character area and type in which the station is located, and we would further recommend that the LA Heritage Officer, Conor Nelligan, is consulted in this regard.

2. pNHA – Natural Heritage Area

The EIAR states that the proposed development will go through a section of the Ballyvergan Marsh, which encompasses the coastal marsh surrounding that surrounds Summerhill Holiday Park. It is recommended that a method statement is prepared prior to commencement of the development to ensure that this portion of the development is managed appropriately. The Heritage Council would highlight the comprehensive submission made by the NPWS and associated comments from Cork County Council's Ecological Unit, the solution driven approach is a worthy endeavour to seek positive outcomes for a range of fauna and flora and particularly the habitats that support them.

3. Removal of Hedgerows

It is noted from the EIAR that the proposed development includes the removal of hedgerow along parts of the planned route of the underground cable (UGC). The Heritage Council would recommend that these hedgerows are reinstated following the construction phase and their species composition reflect the native hedgerow composition of the landscape character. We would recommend contacting the LA Heritage Officer in this regard to ensure that the local biodiversity knowledge and expertise is core to any proposal works.

4. Archaeology and Cultural Heritage

We recommend that special attention is taken with regard to any works adjacent to riverine, coastal, wetland (and reclaimed ground) locations given the high likelihood for the presence of archaeological features and objects in such areas and that archaeological mitigation is a central part of the project from the very beginning (including checking National Museum of Ireland Topographical files, cartographic evidence, modern and historic aerial photographic and archival research). Indirect impacts on the setting of monuments, their place in the landscape and views into and outwards from monuments should also be considered. Aspects of intangible heritage e.g. traditions, folklore and more recent forms of heritage are also worthy of consideration and interpretation. Aspects of the intangible heritage of the river e.g. boating traditions and folklore associated with it is also worthy of consideration and interpretation.

We note that the reclaimed wetland at Summerfield has a number of cultural heritage features including a rifle range, a disused railway line and unusual field divisions indicative of past human activity.

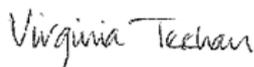
The Youghal Town Strand Architectural Conservation Area (ACA) is near the site of land fall for this proposal. It is shown in the north-eastern corner of map E-1130. The impact of any temporary works and any structures to accommodate the land fall of the interconnector should take into account the protective status of this area. Views and prospects to and from the terrace originally known as 'Claycastle', now as 'Front Strand' are a material consideration in the planning policy for this area.

5. Environmental Manager and Communications (Prescribed Bodies)

The Heritage Council would recommend that an Environmental Manager is employed to ensure that the EIAR is implemented in its entirety. Stakeholders and prescribed bodies should receive regular updates on EIAR implementation and core environmental and heritage management matters associated with the proposed scheme.

On behalf of the Heritage Council, I hope that you find the above a useful contribution.

Yours faithfully,



Virginia Teehan
Chief Executive