



Tionscadail Innealtóireachta agus Mórthionscadail,
Aon Lárcheantar Aerfort Bhaile Átha Cliath,
Clochrán, Co. Bhaile Átha Cliath, K67 XF72, Éire
Fón +353 1 703 8000

Engineering and Major Projects,
One Dublin Airport Central, Dublin Airport,
Cloghran, Co. Dublin, K67 XF72, Ireland
Phone +353 1 703 8000

**Laois County Council,
Planning Department,
County Hall,
JFL Avenue,
Portlaoise,
Co. Laois,
R32 EHP9.**

18th September 2023

FAO: Evelyn Brownrigg Administrative Officer – by hand

**Re: Discharge of Planning Permission Conditions for Unit 1 of Laois Kilkenny
Electricity Reinforcement Project – ABP Reg. Refs. VA0015.**

Dear Ms Brownrigg,

I refer to your letter dated 3rd July 2023 in which you state that *“Having reviewed the documentation submitted, the Planning Authority is not satisfied that condition 11 of ABP Reg Reference VA.0015 for unit 1 has been complied with.”*

Having regard to the feedback provided in your letter of 3rd July 2023, ESB has undertaken to revise the CEMP documentation accordingly and are providing a copy of the CEMP to the Planning Department as per Condition 11. We include herein a table referencing each numbered item in the letter to the appropriate section of the CEMP documentation submitted where the item is addressed.



LCC Correspondence Ref. 3 rd July 2023		ESB Submission Ref. 18 th Sep 2023
Intro	CEMP in comparison to Previous Submissions	This updated CEMP should be referenced only.
1.	General- Lack of Detail on Overall Development	Updated in various places through the CEMP. Overall Development discussed in Introduction and in Section 2.4 on the Preliminary Development Programme
1a.	Development Plan	CEMP – A Preliminary Development Programme and Project Gantt Chart are included in the CEMP Section 2.4 - Figure 2 & Appendix 7, Section 3.1 & 3.2
2.	Section 1- Introduction	
2a.	Clarification on phases	CEMP - Section 2.4 - Figure 2 & Appendix 7, Section 3.1 & 3.2
2b.	Overall Programme	CEMP – A Preliminary Development Programme and Project Gantt Chart are included in the CEMP. Section 2.4 - Figure 2 & Appendix 7, Section 3.1 & 3.2
3.	Section 2.2 (Lack of Hydrogeological Details)	
	Section 2.2 (lack of Hydrogeological Details)	CEMP – Groundwater in the sand and gravel deposits, (i.e. the shallow aquifer) <u>is not</u> in hydraulic continuity with the bedrock aquifer underlying the site. This is demonstrated in Section 3 of the CEMP. Section 3 is an assessment carried out by IE Consulting - Hydrogeological experts on this project.
4.	Section 3- Construction Works	
4a.	Programme of Works	CEMP - A Preliminary Development Programme and Project Gantt Chart are included in the CEMP Section 2.4 - Figure 2 & Appendix 7
4b.	Section 3.2.2 <i>Foundation formation will involve a 2.6m deep excavation....it is not envisaged groundwater will be encountered...</i>	CEMP – This item has been corrected in the CEMP. It is introduced in Section 3 where it states that from site investigations, groundwater strikes range from 0.80m in the shallow aquifer. The rest of the CEMP follows on from this assertion, which leads to the development of a Dewatering Procedure in Section 5.1.1 and references this throughout Section 4. IE Consulting reports are also included in appendices.
4c.	Section 3.2.3- Settlement Ponds	CEMP – Section 4.1.4.2 <i>Drainage Pond Infrastructure</i> contains updated text on the settlement pond construction. Drainage Drawings also include impermeable liner. Settlement pond design drawing in Appendix 6 shows instructions on how to install ponds. Section 4.1.4.2 also refers to the construction of settlement ponds in a perched water table.
4d.	Section 3.2.5- Management and Monitoring of Site Drainage	CEMP – There will be 3 No. Full Retention Oil Separators installed for the development. 2 No. will be installed within the transformer bunds and 1 No installed underground

LCC Correspondence Ref. 3 rd July 2023		ESB Submission Ref. 18 th Sep 2023
		outside of the bunded area. The term 'Oil Separator' is used in the CEMP, however the term 'oil interceptor' has the same function. Details are included in <i>Section 4.1.6.3 Klargester Full Retention Oil Separator</i> and <i>Section 4.2.4 Transformer Bunds</i> and <i>Section 4.2.5 Oil Sensitive Pumps</i> . Only 1 No. Oil Separator is designed for the substation. The rationale for this is included in the above referenced <i>Section 4.1.6.3</i> .
4e.	Section 3.3.2- Transformer Bunds, Foundations & Fire Walls	CEMP- Section 4.2.4 provides details on transformer bunds. Foundations are discussed under 110kV at <i>Section 4.1.6.2 110kV Foundations</i> and <i>Section 4.2.2 400kV Foundations – Fire Walls</i> are described in <i>Section 4.2.6</i> . Appendix 18 also contains a copy of ESB's Bund Test Report Template as described in the sections above.
5a.	Section 4.2.1- Air Quality and Dust Management	Section 5 <i>Environmental Management</i> and Appendix 2 - <i>Site Logistics Plan</i> details location of wheel wash
6.	Surface Water & Groundwater Monitoring.	
6a.	Water monitoring Programme.	CEMP – Water Monitoring Programme discussed in <i>Section 8 Monitoring Measures</i> and also included as Appendix 15
6b.	Water monitoring Locations	CEMP – Appendix 16- <i>Hydrological Mitigation and Monitoring During Construction Map</i> depicts ground surface water monitoring locations as well as mitigation measures at downstream locations.
6c.	Water monitoring Programme Sampling & Analysis	CEMP , Table 9 – Monitoring Measures 'Suspended Solids' will be included in IE Consulting and Kilwex Environmental Monitoring parameter sampling set.
6d.	Decommissioning & Protection of Groundwater wells.	CEMP – Included in IE Consulting Report, <i>Section 3.2.1.2 Decommissioning of BH04 and BH05</i> and relevant also is <i>Appendix 9G Draft RAMS for Decommissioning and Installation of Boreholes 2023</i> . CEMP – <i>Section 4.1.1.4 – Protection of Boreholes</i>
6e.	Baseline groundwater & surface water monitoring	All water quality monitoring results will be measured and interpreted against the following standards: <i>EQS standards for water quality - SI272/2009 as amended by SI372/2012; SI386/2015; SI77/2019; SI659/2021</i> <i>European standards for groundwater quality SI366/2016 Groundwater Regulations</i> See CEMP Appendix 10 . Water quality results recorded thus far compared with above quality standards

LCC Correspondence Ref. 3 rd July 2023		ESB Submission Ref. 18 th Sep 2023
		Interpretation and comparative analysis of results will be produced by Kilwex and IE Consulting in their respective monitoring reports.
7	Consistency with Previous Information Provided	<p>The previous CEMP only contained work activities that would be undertaken by the main Civil Contractor, Kilwex. The information on the decommissioning of and installation of boreholes was omitted from CEMP as this did not form part of their scope of work. This CEMP now includes this information and details clearly in Section 3 that IE Consulting have carried out a thorough assessment of all historic boreholes that took place previously. Section 3 contains all the information required here. Appendix 9G also contains the <i>Draft RAMS for decommissioning and installing boreholes</i></p> <p>Section 2 – Table 2 also contains the Preliminary Development Programme which includes the decommissioning and installation of boreholes and also the fencing of boreholes onsite.</p> <p>CEMP – Section 4.1.1.4 – Protection of Boreholes CEMP Appendix 16 – Depicts location of boreholes - active, proposed and proposed for decommissioning</p>
8	Drainage Details	The drainage drawings included in Appendix 6 reflects the drainage network for the permitted design.

Following consideration of the information by LCC we are keen to meet with you to review in detail and discuss any additional queries/feedback that you may have. In the event any aspect of the compliance documentation is unclear or if additional copies of previous submissions are required, these can be provided. If you have any queries please contact me on 086 8336990 or Brendan.allen@esb.ie.

Yours sincerely,



Brendan Allen FIPI
Planning Team Leader