



To: D Collins, SAO, PCI Unit.

CC: Director of Planning

From: Seamus Grant, EO, PCI Unit.

Subject: Reg. 347/2013, Annex VI, Paragraph 6 (Project Website)

Date: 26th August 2014

Introduction

Article 9.7 of Regulation (EU) 347/2013 requires that a project promoter shall establish and regularly update a website with relevant information about the project of common interest, which shall be linked to the commission website and which shall meet the requirements specified in Annex VI.6.

Regulation (EU) 347/2013, Annex VI

I have examined the EirGrid N/S Interconnector Project website and the following is my analysis with a view to establishing the satisfaction of the requirements of Regulation (EU) 347/2013. Annex VI, Paragraph 6 of the regulation requires that the project website should make available the following:

1. Paragraph 6(a) requires an information leaflet of no more than 15 pages (re: Annex VI, Paragraph 5), giving, in a clear and concise manner, an overview of the purpose and preliminary timetable of the project, the national grid development plan, alternative routes considered, expected impacts, including of cross-border nature, and possible mitigation measures, which shall be published prior to the start of the consultation; The information leaflet shall furthermore list the web addresses of the transparency platform referred to in article 18 of the manual of procedures referred to in point (1). The information required is available in various documents to be found on the website, such as the "Grid 25" document and the "North-South Project Summary Report" document. Information regarding alternative routes, impacts, mitigation etc., can be found on the "Preferred Project Solution Report" of July 2013. This document (including appendices) runs to 137 pages. Absent is a bespoke information leaflet on the website. EirGrid has stated that the multiple brochures produced, including "community update" and "landowner" brochures (available on the website), covers this requirement. The information leaflet is the first requirement of both

Annex VI.5 and Annex VI.6. It is my opinion that the regulation in this case should be followed to the letter. There is no reason why a single information leaflet cannot be published.

2. **Paragraph 6(b) requires a non-technical and regularly updated summary of no more than 50 pages reflecting the current status of the project and clearly indicating, in case of updates, changes to previous versions.** EirGrid has provided an easily accessible, non-technical five webpage project summary report based on five sections; Overview, Health & Safety, FAQs, Benefits and Project Activities. The final section, Project Activities, has a link to activities carries out every year between 2002 and 2014. The activities are date stamped and clearly chronicle updates.
3. **Paragraph 6(c) requires the availability of the project and public consultation planning, clearly indicating dates and locations for public consultations and hearings and the envisaged subject matters relevant for those hearings.** Though details of open centres of which the public may avail have been provided, EirGrid has stated that all pre-application consultations and hearings of this nature have already taken place. The publication of dates and locations of these consultations and hearings is therefore not applicable due to the mature stage of the project. The retrospective nature of this process is a major consideration in this case.
4. **Paragraph 6(d) requires contact details in view of obtaining the full set of application documents.** These have been provided. In addition to a phone number, email address and a web site address, the project website states that EirGrid "will place planning notices in national and local newspapers to inform the public of its intention to [submit the application]. These notices will also advise of the locations and times when the application can be inspected".
5. **Paragraph 6(e) requires contact details in view of conveying comments and objections during public consultations.** In addition to the details provided (noted re: Paragraph 6(d), see above), the website also states that "public and landowners may make submissions directly to An Bord Pleanála during this same period". A link to the ABP website is provided in the same section.

Conclusion

The information provided on the project website largely satisfies the requirements of the regulation. One exception is the 15 page information leaflet required by Paragraph 6(a). The other notable feature is that the website contains a very large amount of information (including 13 years of details of project activities) and as a result, despite a search feature, can be rather time consuming to use. In my opinion this may reinforce the view that the Board should consider modifying the concept and that the publication of the required 15 page information leaflet should be integral to the public participation concept and be subsequently made available on the dedicated website.



Seamus Grant
Executive Officer,
PCI Unit