

GREENLINK - REPORT SUMMARISING THE CHANGES BETWEEN DRAFT AND FINAL APPLICATION FILES

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Greenlink Interconnector
- connecting the power markets
in Ireland and Great Britain

Greenlink
INTERCONNECTOR



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1 Introduction

The Greenlink interconnector project is a project of common interest (PCI), reference number 1.9.1 (TENTec Number 27099275). The developer of the project is Greenlink Interconnector Ltd.

The PCI Unit of An Bord Pleanála provided guidance on the procedure to be followed for consent applications for PCI projects in the Project of Common Interest Manual of Permit Granting Procedures. In accordance with the guidance, Arup submitted a draft application file to the PCI Unit on 12 June 2020. The PCI Unit consulted consent authorities with regard to the draft application file. The Strategic Infrastructure Development (SID) Unit of An Bord Pleanála and the Commission for the Regulation of Utilities (CRU) identified the information which was required to complete the application file. The PCI Unit conveyed the requirements of these consent authorities, in relation to missing information, to Arup by letter dated 13 August 2020. Arup submitted additional information on 3 September 2020, on behalf of Greenlink Interconnector Ltd.

The PCI Unit's response to that submission, dated 24 November 2020, included further matters to be addressed in the final application file, which had been identified by SID Unit of An Bord Pleanála.

As per Section 4.2.3 of Manual of Permit Granting Process Procedures 'Given that there may be a passage of time since the original draft application file was submitted any changes or amendments if not material in nature may be accepted if accompanied by a covering letter detailing the changes'. This report presents a summary of the response to the identification of missing information and to the further matters to be addressed in the final application file. It also presents any other additional changes (none material in nature) undertaken by Greenlink Interconnector Ltd following the submission of the draft application file.

2 Summary of Missing Information and GIL Responses

2.1 Missing Information Identified by SID Unit

The information identified as missing by the SID Unit of An Bord Pleanála, notified to Greenlink Interconnector Ltd in the PCI Unit's letter of 13 August 2020, and the response from Greenlink Interconnector Ltd (GIL) is summarised in Table 1.

Table 1 Missing Information Identified by SID Unit and GIL Response of 3 September 2020

An Bord Pleanála SID Missing Information (PCI letter of 13 August 2020)		GIL Response submitted on 3 September 2020
3.4.1	<p>Schedule of permits/consents required to realise the project</p> <ul style="list-style-type: none"> • Outlined in Section 1.7 of EIAR for jurisdiction of the Irish State. • Consents in the jurisdiction of the United Kingdom should be provided. • It would be useful to include in separate planning report. 	<p>A <i>Planning Report</i> was provided as part of this Missing Information Pack.</p> <p>Section 6, Schedule of Permits Required and Status of Each, of the <i>Planning Report</i> provided a schedule of permits/consents in both the Irish State and United Kingdom.</p>
	<p>Letter confirming that the project promoter has included details of all permits/consents that are required to realise the project in the Schedule.</p> <ul style="list-style-type: none"> • Should be provided. 	<p><i>ABP permits and consent confirmation letter dated 01.09.20</i> was provided as part of the Missing Information Pack.</p>

An Bord Pleanála SID Missing Information (PCI letter of 13 August 2020)		GIL Response submitted on 3 September 2020
<p>Provision of contact details for each of the relevant consenting authorities</p> <ul style="list-style-type: none"> Should be provided. 	<p>A <i>Planning Report</i> was provided as part of the Missing Information Pack.</p> <p>Section 6.4, Contact details for the relevant Consent Authorities, of the <i>Planning Report</i> provided the information for the permits/consents in both the Irish Sate and United Kingdom.</p>	
<p>Document detailing all the information and plans and particulars that are required for each separate application or consent required to issue the comprehensive decision.</p> <ul style="list-style-type: none"> Should be provided. 	<p>A document titled <i>Greenlink - Consent Applications Overview</i> was provided as part of the Missing Information Pack.</p>	
<p>Details of any documents such as reports or surveys that are incomplete together with an estimated timeline for completion.</p> <ul style="list-style-type: none"> Details are included where relevant in the documents. 	<p>In the cover letter to the Missing Information Pack, Arup confirmed that all reports and surveys required are complete. Details of such were included in EIAR and NIS as appropriate.</p>	
<p>A schedule of the intended dates for lodgement of all the relevant applications for consent required.</p> <ul style="list-style-type: none"> Should be provided. 	<p>A <i>Planning Report</i> was provided as part of the Missing Information Pack.</p> <p>Section 6, Schedule of Permits Required and Status of Each, of the <i>Planning Report</i> provided the information on the status and/or intended dates of lodgement of relevant applications for consent.</p>	

An Bord Pleanála SID Missing Information (PCI letter of 13 August 2020)		GIL Response submitted on 3 September 2020
	Contact details for the project promoter.	This information was provided in the application form.
3.4.2.3	<p>Draft Environmental Impact Assessment Report - Ireland Onshore</p> <p>The draft application is accompanied by an EIAR in 2 volumes. The non-technical summary is included in the first Volume (part 1 of 2) with the Main Chapters. The following provides and outline of matters which are considered to constitute missing information or require clarification. Only chapters where such missing information exists or clarification is required are referenced.</p>	
	Contents - Separate Table of Contents from Non-Technical Summary within first section of Volume and indicate in Table of Contents that Appendices are included in separate Volume.	In the revised <i>EIAR</i> , provided as part of the Missing Information Pack (which replaced <i>draft EIAR</i> previously submitted), the Table of Contents was revised to indicate that the appendices and the Non-Technical Summary were in separate volumes.
	<p>Introduction and Background - Section 1.7 - Consents in the jurisdiction of the United Kingdom should be provided and the up to date status of consents within the Republic of Ireland and the United Kingdom should be provided.</p> <p>Section 1.6.2 - update details on pre-application stage.</p>	<p>A <i>Planning Report</i> was provided as part of the Missing Information Pack.</p> <p>Section 6, Schedule of Permits Required and Status of Each, of the <i>Planning Report</i> provided a schedule of permits/consents in both the Irish Sate and United Kingdom.</p>

An Bord Pleanála SID Missing Information (PCI letter of 13 August 2020)		GIL Response submitted on 3 September 2020
	It would be useful to include all of the consents/schedules in a section within a separate planning report with an up to date status on same.	
	Construction Strategy - Figure 4.11 - provide in colour	In the revised <i>EIAR</i> , provided as part of the Missing Information Pack, (which replaced the <i>draft EIAR</i> previously submitted) - Figure 4.11 was provided in colour.
	<p>Population and Human Health - This chapter should be the first environmental factor to be considered in the <i>EIAR</i> rather than being one of the last.</p> <p>Documentation should confirm whether there are any relevant extant planning permissions, or current planning applications as appropriate, along the route of the proposed development.</p>	<p>A revised <i>EIAR</i> was provided as part of the Missing Information Pack (to replace the draft report previously submitted).</p> <p>Population and Human Health chapter remains as Chapter 15. All environmental chapters have been given equal analysis and weighting regardless of the ordering within the report.</p> <p>Information on the receiving environmental with regard to air, noise and water quality, which has the potential to have effects on human health are provided in preceding chapters (Chapters 7, 8 and 13 respectively).</p> <p>Details on planning permissions are included in the <i>EIAR</i> Chapter 15, the Planning Report and Q7 of the Application Form for Permission in respect of SID.</p>
	Other Matter	In revising the <i>EIAR</i> , which was provided as part of the Missing Information Pack (to replace the <i>draft EIAR</i> previously

An Bord Pleanála SID Missing Information (PCI letter of 13 August 2020)		GIL Response submitted on 3 September 2020
	A complete review of the document should be undertaken for typographical errors.	submitted), a complete review of the document was undertaken for typographical errors.
	<p>Appendices</p> <p>A table of contents at the start of the document indicating the location of each of the reports within the document is recommended.</p> <p>A review of the contents of each of the Appendices document should be undertaken as a number of dividers did not contain any document, and therefore it is not clear if information is missing, and other sections appeared to have multiple documents but with no table of contents</p> <p>The draft Construction Environment Management Plan (CEMP) should be prepared based on the most up to date information available at the time of making the application.</p>	<p>In the revised <i>EIAR</i>, provided as part of the Missing Information Pack (replaced the draft report previously submitted), a Table of Contents was provided for <i>Volume 2</i>. The <i>EIAR Volume 2</i> was reviewed, prior to submitting it as part of the Missing Information Pack, to ensure documentation was included within the correct sections.</p> <p>The CEMP has been prepared based on the most up to date information available at the current time. The CEMP will be reviewed and revised (as required) prior to final application submission.</p>
3.4.2.4	<p>Joint Environmental Report</p> <p>It is noted that the European Commission document <i>Guidance on the Application of the Environmental Impact Assessment Procedure for Large Scale Trans-boundary Projects (2013)</i> is referenced in Section 1.9.2 of the <i>EIAR</i>. This requires that the entirety of environmental effects of</p>	<p><i>A Joint Environmental Report - Greenlink Summary of Offshore and Onshore Environmental Effects</i> was provided as Appendix 1.6 of the revised <i>EIAR</i>, as part of the Missing Information Pack</p>

An Bord Pleanála SID Missing Information (PCI letter of 13 August 2020)		GIL Response submitted on 3 September 2020
	the Interconnector project is assessed and dealt with in the application documentation and requires the production of a Joint Environmental Report. A Joint Environmental Report does not form part of the information that I have been forwarded and the applicant is advised to consult the Guidance in this regard and to submit a Joint Environmental Report.	
3.4.2.5	<p>Presentation</p> <p>Each volume of the EIAR is provided with a Table of Contents.</p> <p>A complete review of the document should be undertaken for typographical errors.</p>	In revising <i>EIAR</i> , which was provided as part of the Missing Information Pack (to replace the draft report previously submitted), a complete review of the document was undertaken for typographical errors.
3.4.3	<p>Draft Natura Impact Statement</p> <p>No comment</p>	
3.4.4	<p>Draft Application Drawings including A3 pack</p> <p>It is noted that only 4 site notices are proposed along the route of the proposed development. It is considered that additional notices should be included at road junctions and within Ramsgrange village.</p>	<p>Additional site notices were proposed. The revised drawings, listed below, which showed the additional site notices, were provided as part of the Missing Information Pack:</p> <ul style="list-style-type: none"> • C-RM-002_PL3 • C-RM-003_PL3

An Bord Pleanála SID Missing Information (PCI letter of 13 August 2020)		GIL Response submitted on 3 September 2020
		<ul style="list-style-type: none"> C-RM-004_PL3.
3.4.5	<p>Schedule of pre-application consultations.</p> <p>It is recommended that the meetings held with the SID and PCI units of An Bord Pleanála should be detailed separately as they relate to two separate processes.</p>	<p>A <i>Planning Report</i> was provided as part of the Missing Information Pack.</p> <p>Section 1.7, Pre-Application Consultation of the <i>Planning Report</i> provided details of SID and PCI consultations separately.</p>
3.4.6	<p>Planning Report</p> <p>While the information is contained within the EIAR, it is recommended that the application is accompanied by a comprehensive planning report, under separate cover, which brings together the development description, planning history, policy and planning policy context, need and justification for the proposal, schedule of permits required and an outline of the status of same. Reports on public consultation undertaken and community gain proposals could be attached as appendices to this report.</p>	<p>A <i>Planning Report</i> was provided as part of the Missing Information Pack. The <i>Planning Report</i> provided the information specified.</p>
	<p>Report on Electromagnetic Fields</p> <p>While addressed at Section 15.4.3.5 of the EIAR and Appendix 15.1 it is considered that a separate report on potential effects on the local environment from</p>	<p>The amended Appendix 15.1 of the revised <i>EIAR</i> provided, as part of the Missing Information Pack, included a non-technical summary of the report on electromagnetic fields.</p>

An Bord Pleanála SID Missing Information (PCI letter of 13 August 2020)		GIL Response submitted on 3 September 2020
	Electromagnetic Fields would be useful for the public and should be submitted.	
	Offshore Documents It is also considered that copies of the Offshore documents - EIAR & NIS - should be submitted for ease of reference	The <i>Greenlink Marine EIAR Ireland</i> and <i>Greenlink Marine NIS Ireland</i> were provided as part of the Missing Information Pack.
	Documents related to United Kingdom While outside the Irish State, an outline and review of the documents submitted for that part of the development within the jurisdiction of the United Kingdom should also be submitted.	The <i>Greenlink - Consent Applications Overview</i> was provided as part of the Missing Information Pack.

2.2 Matters to be Addressed identified by SID Unit

The matters to be addressed, identified by the SID Unit of An Bord Pleanála and notified to Greenlink Interconnector Ltd in the PCI Unit's letter of 24 November 2020, and the response from Greenlink Interconnector Ltd (GIL) is summarised in Table 2.

Table 2 SID Unit Matters to be Addressed (November 2020) and GIL Response in Final Application File

An Bord Pleanála SID Missing Information (PCI letter of 13 August 2020)	GIL Response in planning application

<p>3.2.1.4</p>	<p>Population and Human Health</p> <p>SID Unit Request - First a point of clarification was requested. It was stated that the Population and Human Health chapter should be the first environmental factor to be considered in the EIAR rather than being one of the last.</p> <p>Project Promoter Response - in relation to population and human health, it is stated that it remains as Chapter 15, with all environmental chapters have been given equal analysis and weighting regardless of the order in the report. Information on the receiving environmental with regard to air, noise and water quality, which has the potential to have effects on human health are provided in preceding chapters. While I acknowledge the response, <u>I consider that the consideration of population and human health as the first environmental factor is best practice.</u></p>	<p>Population and Human Health chapter remains as Chapter 15. Information on the receiving environmental with regard to air, noise and water quality, which has the potential to have effects on human health are provided in preceding chapters (Chapters 7, 8 and 13 respectively).</p>
<p>3.2.2.2</p>	<p>Presentation</p> <p>SID Unit Request - It was requested that each volume of the EIAR was provided with a Table of Contents and that a complete review of the document should be undertaken for typographical errors is addressed above in Section 3.2.1.5. <u>The project promoter should be advised to undertake a further review in advance of submission of the application.</u></p>	<p>A complete review of the document was undertaken for typographical errors.</p>

<p>3.2.5.2</p>	<p>Report on Electromagnetic Fields</p> <p>While addressed at Section 15.4.3.5 of the EIAR and Appendix 15.1 it is considered that a separate report on potential effects on the local environment from Electromagnetic Fields would be useful for the public and should be submitted.</p> <p>The response provided refers to Appendix 15.1 of the EIAR which they state now includes a non-technical summary. While this is useful, I consider that it would be more user friendly if this document was submitted as a standalone document for ease of access for the public who may not be aware that it is contained in a volume of the EIAR. <u>I would advise that the project promoter be informed of this advice.</u></p>	<p>The <i>Greenlink EMF Environmental Report</i> will be submitted as a separate report in addition to being included as Appendix 15.1 of the <i>EIAR</i>.</p>
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2.3 Missing Information Identified by CRU

2.3.1 Application for Authorisation to Construct an Interconnector

The information, identified as missing by the CRU in relation to the application for an Authorisation to Construct an Interconnector and notified to Greenlink Interconnector Ltd in the PCI Unit’s letter of 13 August 2020, and the response from Greenlink Interconnector Ltd (GIL) is summarised in Table 3.

Table 3 Missing Information Identified by CRU and GIL Response of 3 September 2020

CRU Response on Authorisation to Construct an Interconnector (Section 16 of Electricity Regulation Act, 1999) Missing Information (PCI letter of 13 August 2020)	GIL Response submitted on 3 September 2020
<p>Financial history of the applicant/company</p> <p>Applicants are required to submit statements of the accounts of the last two years, together with copies of the latest audited accounts. If more than three months have elapsed since the end of the accounting year covered by the accounts submitted, the applicant must confirm that no material adverse change has occurred. The GIL draft application does not include accounts for the required dates.</p>	<p>The audited financial statements for the years ending 31 December 2017 and 2018 were provided by GIL in its letter responding to the missing information identified by the CRU. The audited financial statement for the year ending 31 December 2019 was not available when the response was submitted. The response also contained a draft certificate in relation to material adverse change for the period following 31 December 2018. The letter also included shareholder accounts for the GIL shareholders and draft statements in relation to their shareholdings.</p>
<p>Project timelines and financial feasibility</p> <p>Applicants are required to submit detailed financial forecasts for the project in order to demonstrate financial security and feasibility, including the source of finance and confirmation from lenders, where relevant. Such information has not been included in the GIL draft application.</p>	<p>The paper <i>CRU Project Planning Feasibility</i> was provided by GIL in its letter responding to the missing information identified by the CRU.</p>
<p>Details of current or future planning applications or consents</p>	<p>In its letter responding to the missing information identified by the CRU, GIL stated that a draft Application File had been</p>

CRU Response on Authorisation to Construct an Interconnector (Section 16 of Electricity Regulation Act, 1999) Missing Information (PCI letter of 13 August 2020)	GIL Response submitted on 3 September 2020
<p>In order to issue an Authorisation to Construct an Interconnector, the CRU required evidence of planning consent under the existing form. This has not been included in the draft application. CRU has previously stated it may allow for future applications to be made prior to the relevant planning consents being received. In this situation, once the relevant planning consents have been granted and made available to the CRU, and provided the remainder of the application meets the necessary requirements, the CRU could then issue the Authorisation.</p>	<p>submitted to SID via PCI on 12 June 2020. It was expected that the final application file would be submitted to SID in October 2020 and GIL expected to obtain planning permission in Q1/2 2021, a copy of which would then be forwarded to CRU.</p>

2.3.2 Application for Authorisation to Lay Cables

The information, identified as missing by the CRU in relation to the application for Authorisation to Lay Cables and notified to Greenlink Interconnector Ltd in the PCI Unit’s letter of 13 August 2020, and the response from Greenlink Interconnector Ltd (GIL) is summarised in Table 4.

Table 4 Missing Information Identified by CRU and GIL Response of 3 September 2020

CRU Response on Authorisation to Lay Cables (Section 48/49 of Electricity Regulation Act, 1999) Missing Information	GIL Response submitted on 3 September 2020
<p>The CRU has previously indicated to GIL that it may be possible to consider a Section 48 and Section 49 application in parallel with an application for an <i>Authorisation to Construct an Interconnector</i>. However, consent may not be granted to an applicant prior to receiving an authorisation from the CRU. It is understood from the draft application that the applicant does not yet have this authorisation but intends to apply for it.</p>	
<p>It is further understood from the draft application that the applicant does not have planning permission for the development in question. An applicant for consent under Section 48 and Section 49 must possess planning permission. Details of the planning permission must be provided within an application for consent.</p>	<p>In its letter responding to the missing information identified by the CRU, GIL stated that a draft Application File had been submitted to SID via PCI on 12 June 2020. It was expected that the final application file would be submitted to SID in October 2020 and GIL expected to obtain planning permission in Q1/2 2021, a copy of which would then be forwarded to CRU.</p>
<p>Further, applicants for consent under Section 48 and Section 49 are required to provide evidence that the authority responsible for the public road or railway in which lines will be laid has given permission for the works to take place. This has not been provided in the draft application.</p>	<p>In its letter responding to the missing information identified by the CRU, GIL explained that road opening licences will be sought from Wexford County Council prior to work commencing. GIL gave the timeline for these.</p>

<p>CRU Response on Authorisation to Lay Cables (Section 48/49 of Electricity Regulation Act, 1999) Missing Information</p>	<p>GIL Response submitted on 3 September 2020</p>
<p>Similarly, under Section 49 applicants are asked to provide evidence of landowner agreements. It is understood that engagement with some landowners are ongoing, but no evidence of landowner agreement was provided in the draft application.,</p>	<p>GIL explained that the DC cable will be installed in the road under two railway bridges of the disused railway, that GIL was in discussions with CIE group property with regard to obtaining a licence for the installation, that commercial discussions were ongoing and that GIL had received a letter of consent from CIE to submit the planning application.</p> <p>In connection with the CRU’s section 48 ad 49 consents, GIL stated that it requires 13 wayleave option agreements to install cable across private property where, for technical reasons, installation in the public road is not an option. For each of these landowners (except one where discussions were ongoing) GIL had signed planning consent letters to submit with the planning application. GIL expected to submit all landowner planning consent letters with the planning application.</p>
<p>An application for consent can only be considered where the above information is provided. Supporting documents should be provided alongside any application for consent. Further information and details of supporting information is available in the Section 48 and Section 49 Guidance Note for applicants which is published on the CRU website.</p>	<p>In its letter responding to the missing information identified by the CRU, GIL stated that the information listed in the Section 48 and Section 49 Guidance Note would be provided in the application for consent.</p>

3 Additional Changes undertaken by Greenlink Interconnector Ltd

Following the submission of the draft application file to the PCI Unit on 12 June 2020, Greenlink Interconnector Ltd (GIL) undertook other non-material changes to the application file documentation (in addition to those identified by the PCI Unit’s letters of 13 August 2020 and 24 November 2020). These are summarised in Table 5 below.

Table 5 Additional Changes undertaken by Greenlink Interconnector Ltd between the draft application file and final application file

Change
Application Form for Permission/Approval in respect of a Strategic Infrastructure Development was finalised with letters of Consent and EIA Portal confirmation notice attached
Any conflicting information in relation to the scope of works (building heights and dimensions etc.) were modified across the final application documents.
The construction programme has been modified in all documents (including the Environmental Impact Assessment Report, Natura Impact Statement and Joint Environmental Report) to note the development construction will commence in May 2021 - previously it was noted as 2020.
The redline boundary at Baginbun landfall has been modified to match the property boundary of the landowner.
The Electromagnetic Field (EMF) Environmental Report was edited to include additional references for further clarity.
Drawings have been modified to improve clarity of the proposed development across all drawings. Modifications include: <ul style="list-style-type: none">• A revised tailstation layout and MV Substation location,

Change

- Addition of existing wayleave to layout plans,
- Modification to line colours
- Modification of red line boundary at Campile Estuary crossing
- Addition of blue line boundary of the existing landowners at the converter station site,
- Addition of contiguous sections through the convertor station,
- Addition of key plans to plan drawings.