

An
Bord
Pleanála

Memorandum PCI Celtic Interconnector

To: Diarmuid Collins, SAO, PCI Unit
From: Rachel Kenny, Director of Planning Operations, ABP
Re: PCI Process: Celtic Interconnector
Date: 15th March 2018

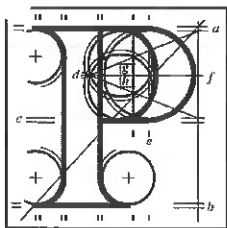
Further to your letter of 4th January, 2018 and Report of Una Crosse, SPI (prepared on foot of SI pre-app meeting with Eirgrid), I would comment as follows:

Having regard to the proposal submitted to date, the summary findings of prospective applicant, in respect of land studies and Marine Route Investigation, the applicant's completion of Step 2 Pre-Consultation and initiation of Step 3 Pre-Consultation, and the level of engagement and details available to the SI team and reported on by the SPI for this case (at pre-app stage), and on foot of EirGrid and RTE's request to commence the PCI pre-application procedure, this matter has now been formally considered.

Recommendation

Having regard to the documentation on file, and the report of Una Cross (SPI), I am satisfied that there is no substantive reason which would not allow the PCI process to formally commence, and that the applicant may be so advised.

Rachel Kenny
Director of Planning



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Inspector's Report PCI0003/ABP-302725-18

To: Director of Planning.

Report prepared further to instruction from Director of Planning dated 6 March 2019

**Regulation (EU) No. 347/2013 of the European Parliament and of the Council
of 17 April 2013 on guidelines for trans-european energy infrastructure**

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Planning and Development Act, 2000 (as amended)

PCI 0003 / ABP-302725

Project promoter:

EirGrid PLC

Issue:

Project of Common Interest (PCI)/ Strategic Infrastructure (S.I.) application – Notification submitted by Eirgrid PLC seeking 'Acknowledgement' of the project constituting that section of the project falling within the Irish State

Nature of Development:

Proposed Celtic Interconnector to facilitate an electrical link enabling the movement of electricity between Ireland and France via a connection point from East Cork.

Inspector:

Una Crosse

1.0 INTRODUCTION/BACKGROUND

- 1.1. I note An Bord Pleanála's PCI Unit has requested a recommendation as to whether the EirGrid PLC Notification, dated 24th December 2018, should be acknowledged or rejected on the basis of its 'maturity'. I note that Regulation, Article 10.1(a) provides that if the project is rejected as not mature enough to enter the permit granting process that a justification be provided.
- 1.2. I would also note that one meeting relating to the project has been held, on 7th March 2019, in respect of the pre-application consultation request lodged with the Board on 10 October 2018 under the separate strategic infrastructure process. This strategic infrastructure process is ongoing and not yet concluded.

2.0 EirGrid Submission

In the documentation submitted with correspondence dated December 2018 EirGrid makes the following case:

- The project is introduced and notes that the Celtic Interconnector is a proposed electrical link enabling the movement of electricity between Ireland and France being the first direct energy link between the two counties;
- EirGrid has an obligation under its TSO licence to explore and develop opportunities for interconnection with other power systems with East West Interconnector delivered in 2012;
- Celtic Interconnector designated as a Project of Common Interest (PCI) in 2012 under Regulation for the trans-European energy infrastructure (EU 347/2013 – TEN-E Regulation) with PCI status retained during reviews in 2015 & 2017;
- Project been supported by grants from the Connecting Europe Facility (CEF);
- Document outlines the Project Promoters, National Competent Authorities, Irish Consenting Authorities:
- Reference is made to letter from ABP SID Unit, 12th October 2018, which states that the project was not defined enough for the purposes of entering into pre-application consultation with specific reference to the landfall points and proposed sites for the converter station not being sufficiently defined noting that a

defined landfall point and site for the converter station will be defined within 12 months of date of lodgement of notification;

- After this EirGrid propose to re-submit an application to the SID unit for the purposes of pre-application consultation for the SID application which will further enable the completion of the pre-application process within the remaining first year of the 2-year time period allowed for completion of the pre-application stage of the PCI process;
- The proposed project is outlined in respect of its support of the achievement of Europe's energy ambitions including the provision of Ireland's only energy connection to an EU Member State when the UK leaves the EU in addition to improving telecommunications between Ireland and Europe by providing a direct fibre optic link;
- The project elements are outlined which can be summarised as a submarine circuit of c.500km placed on or beneath the seabed between France and Ireland, landfall points in both States, high voltage direct current land circuit between the landfall point and a converter station in each State which converts the electricity from HVDC to HVAC into an existing substation with a fibre optic cable laid along the route;
- The six step consultation and engagement process is outlined noting that to date Step 2 has been completed which included a detailed Project Update Brochure for Step 2 with the proposed Step 3 provisions ongoing with Project Update Brochure 2018 outlined;
- The document outlines the project development to date including an outline of the studies and analyses undertaken, the timing of consents and construction are outlined as second half of 2020 and start of 2022 respectively with completion envisaged for 2025;
- Connection point analysis shows that the Knockraha substation in East Cork could accommodate additional power flows associated with the Interconnector better than the Great Island connection point;

- Ten potential landfall points (5 in East Cork) identified with 6 feasible marine routes identified and following a detailed constraints analysis a route alignment was selected which although not the shortest was considered the best performing (Figure 10) with the nearest approach route options for each of the three landfall options detailed;
- It is stated that the landfall point will be fully re-instated following completion of works and the route between landfall and the converter station will be underground cable installed in ducts under the road network for c. 30-40km;
- Step 3 involves the development of the locations of the various project elements as outlined in Figure 11 refining the options with EirGrid nearing completion (December 2018) of a detailed constraints assessment of the study area for the converter station with most feasible location options to be brought forward;
- Analysis being completed of marine survey data and associated onshore constraints assessment and in process of shortlisting options for the landfall point;
- It is proposed to confirm preferred options in early 2019 so as to carry out public consultation with feedback from same informing Step 4 shortlisted options will be studied in further detail to determine preferred solution for each element;
- For the onshore aspect high level social and environmental impact assessment baseline reports have been prepared and noted that elements of the project in France are subject to mandatory EIA and in interests of consistency intend to subject a voluntary EIAR;

3.0 CONSIDERATIONS

- 3.1. The single matter to be dealt with in this report as set out in your request dated 24th December 2018 is to provide a recommendation to the Board's PCI Unit as to whether the Notification of PCI development consisting of that part of the proposed interconnector project falling within the Irish State should be acknowledged or rejected. Article 10 of Regulation (EU) No. 347/2013 entitled 'duration and implementation of the permit granting process' states at Article 10.1(a) that "*no later*

than three months following the receipt of the notification, the competent authority shall, including on behalf of other authorities concerned, acknowledge or, if it considers the project as not mature enough to enter the permit granting process, reject the notification in written form. In the event of a rejection, the competent authority shall justify its decision, including on behalf of other authorities concerned".

I would note that the Regulation does not define what is meant by not 'mature enough'.

- 3.2. The request from the Board's PCI Unit results from the fact that the proposed development requires a separate consent from the Board given its statutory role under the State's planning (strategic infrastructure) legislation. In making this recommendation I have had regard to the specific statutory role, function and established procedures of the Board in determining strategic infrastructure planning matters under the Strategic Infrastructure provisions of the Planning and Development Act, 2000 as amended.
- 3.3. The decision to be made in this case is influenced by the fact that EirGrid have already entered into the statutory requirements for pre application consultations under the strategic infrastructure provisions of the Planning and Development Act 2000 as amended. Reference ABP-302873-18 refers in this instance. The documents provided with the Notification include material lodged as part of the S.I. pre-application consultation process under reference ABP-302873-18. Given the commencement of the SI pre-application process, I would find it somewhat difficult to conclude at this stage that the Notification should be rejected on basis of the project not being mature enough to enter the permit granting process.
- 3.4. I would note that the Board has not yet provided substantive advice on issues that may have a bearing on its decision under the SID process. The documentation provided requires further development to reasonably define the project for the purposes of the pre-application stage of that process. The documentation submitted with the PCI provides five options for the proposed landfall on the East Cork coast (figure 11). I would note that the documentation outlined in the documentation submitted from EirGrid to the Board dated 15th February 2019 under the SID process outlines that the indicative landfall point is now refined to a location at Claycastle/Redbarn a beach shoreline south of Youghal c.2 km in extent. The

converter station site has been the subject of a constraints assessment and a defined zone around the Knockraha substation site has now been identified.

- 3.5. I would note that it is proposed to undertake a further public consultation process in the next number of months (March – May 2019) to assist in the final determination of the proposed converter station site, the landfall option and the underground land cable route between the two. Therefore, there are currently two landfall options, a number of potential converter station sites within a limited area of the Knockraha substation and a proposed route along public roads running east west from landfall to Knockraha which arguably cannot be finalised until the converter station site is determined.
- 3.6. I note that the PCI process allows for a 2 year period to complete the pre-application stage once the project has been deemed mature enough to commence the permit granting process. While I consider that, under the S.I. provisions there still remains some fundamental questions as to the nature, scope and extent of the project and the associated administrative and regulatory requirements, provision exists within the process itself to address same. As I note above, the emerging preferred landfall options are located within 2km of each other and the land cable route to access either landfall option would arguably be the same for the majority of the route with any divergence localised. The further details outlined in correspondence to the Board and at the pre-application meeting indicate further refinement can be achieved within c. 3 months.

4.0 CONCLUSION

- 4.1. In light of the above I recommend that the Board's PCI Unit be advised of the conclusion that there would appear to be no substantive reason why the Notification lodged with the Board's PCI Unit on the 24th December 2018 pursuant to the provisions of Article 10(1)(a) of Regulation (EU) No. 347/2013 for that part of the proposed Celtic Interconnector Project of Common Interest falling within the Irish State should be rejected.
- 4.2. In reaching this conclusion regard was had to the ongoing consultations for that part of the proposed Celtic Interconnector project falling within the Irish State under the SI provisions of the Planning and Development Act, 2000 as amended and particularly

that (1) pre application consultations are ongoing for the proposed development under An Bord Pleanála pre application consultation reference ABP-302873-18 and (2) that a defined project is close to being finalised with a further refinement of the location of the converter station, route option and landfall option to be determined following a public consultation process to be undertaken forthwith.

Una Crosse

Una Crosse

Senior Planning Inspector

15th March 2019

Noted & agreed
Rachel Kenny
Director of Planning
15.3.2019.