5 Planning and Policy

5.1 Introduction

This chapter examines the proposed development in the context of relevant European and Irish policies and planning frameworks.

The competent authority, in making its decision on a planning application, is required to have regard to the proper planning and sustainable development of the area or region, in which the proposed development is located. The national, regional, county and local development plans, strategies and policies provide the framework for the proper planning and sustainable development of the area or region. They also form part of the context for assessing the population and societal effects of a project.

The purpose of this chapter is to set out the relevant strategic and statutory land use and planning policy context for the proposed development.

This chapter has been prepared by Simon Grennan and Dan Garvey of Arup. A description of the authors' qualifications and experience is presented in **Appendix 1.1**.

5.2 Energy Policy

This section summarises the energy and planning policies that support the delivery of the proposed development.

Greenlink has been awarded Project of Common Interest (PCI) status by the European Commission, making it one of Europe's most important energy infrastructure projects. Under the EU TEN-E Regulations 347/2013, Member States should consider granting PCI projects the status of 'highest national significance' possible. **Chapter 1** *Introduction and Background* provides more information on PCI status.

5.2.1 European Policy on Interconnectors

The 'Energy Union' launched by the European Commission in February 2015, and endorsed by Member States in October 2015, is driving a fundamental transition towards more innovative ways to produce, transport and consume energy, and to address different approaches to design, implement and, where needed, enforce energy policy. A range of actions will be required to make this happen, including improvements to the physical interconnectedness of energy grids (both gas and electricity) to meet a 10% interconnection target by 2020 and to possibly reach 15% by 2030. As of November 2017, 17 European Union Member States have reached the 10% target, with a further 7 on the path to reach the target by 2020. Ireland's level of electricity interconnection in 2017 was 7.4% and the expected level of interconnection in 2020 is 10% (European Commission 2017).

The interconnectivity level is calculated as a ratio between import interconnection and net generation capacities of the country (i.e. the 2017 value is the ratio between simultaneous import interconnection capacity [GW] and net generating capacity [GW] in the country at 11 January 2017, 19:00 pm as resulted from ENTSO-E Winter Outlook 2016/2017).

Subject to receiving planning permission and other consents, Greenlink will commence operation in 2023 and will double the 2017 interconnection percentage.

An interconnected European energy grid is vital for Europe's energy security, for more competition in the internal market resulting in more competitive prices, and for better achieving the decarbonisation and climate policy targets, to which the EU has committed. An interconnected grid will help to deliver the goal of the Energy Union, i.e. to ensure affordable, secure and sustainable energy, as well as growth and jobs across the EU.

There is broad consensus that, in a post-Brexit world, the efficient cross-border trade in electricity between the United Kingdom and the EU should continue. The United Kingdom government has stated its commitment to mechanisms to achieve this (BEIS 2019). The Commission for Regulation of Utilities (CRU) 2018 assessment of the benefits of Greenlink on the economy, post Brexit, is outlined below.

5.2.2 Irish Policy on Interconnection

On 6 July 2018 the Irish Department of Communications, Climate Action and Environment (DCCAE) published its National Policy on Electricity Interconnection in Ireland. The Policy sets out the strategic importance of interconnection to Ireland and the three pillars of its energy policy – sustainability, security of supply and competitiveness. The policy recognises the benefits to the consumer "*including lower long-term costs of electricity*". (DCCAE 2018).

Following public consultation in relation to the initial project assessment of Greenlink, the CRU determined that Greenlink passes the public interest test in Ireland (CRU 2018), i.e. Greenlink has the potential to provide a net benefit to Irish consumers and Ireland a whole.

Whether there is a '*hard*' or '*soft*' Brexit, Greenlink will not only remain economically viable, but will continue to offer benefits to both Ireland and the United Kingdom in the shape of increased energy security, decarbonisation and downward pressure on consumer bills (CRU 2018).

The CRU's modelling included a sensitivity analysis of the impact of Brexit on the benefit of Greenlink to Irish consumers. CRU concluded that under Brexit "*introducing a new interconnector may unlock more benefits to Irish consumers compared to a no Brexit scenario where no trading frictions are present*". The CRU explained: "*this is because the addition of Greenlink in a market with trading frictions provides an additional link to an import/export route and hence consumers are better off than without the addition of a new interconnector.*" (CRU 2018).

Regardless of the outcome of Brexit, Greenlink will be an example of how Ireland and United Kingdom can continue to work positively and profitably together to meet their energy and economic objectives.

5.2.3 Irish Policy on Carbon Emission Reduction

5.2.3.1 National Mitigation Plan 2017

The National Mitigation Plan was published in July 2017. This is the first Irish Government publication with the primary objective to set out a plan to reduce Ireland's carbon emissions. The Plan includes over 100 individual actions for various Ministers and public bodies to take forward. The role of interconnectors in supporting decarbonisation of electricity generation is recognised in the plan. Section 3.1 of the Plan outlines the vision for decarbonising electricity generation, including:

"By the end of the decade, further interconnection with Great Britain and mainland Europe will have enhanced stability of the grid, facilitated further development of our indigenous renewable electricity resources and allow trading of renewables in an integrated electricity market."

Annex 1 lists the actions proposed as part of the Plan. Actions 21 and 22 relate to interconnectors:

Action 21- "*Commission and complete economic and technical research on the merits of further interconnection for Ireland.*" This action was due to be completed by 2017.

Action 22 – "*Develop a regulatory policy for electricity interconnectors for Ireland.*" This action is due to be completed by 2020.

The National Mitigation Plan is underpinned by environmental analysis undertaken through the Strategic Environmental Assessment (SEA) and Appropriate Assessment processes. Annex 2 of the Plan sets out the mitigating measures presented in the SEA Environmental Report and Natura Impact Statement and the sectoral responses to these measures. Interconnection is included as a mitigation measure in the SEA. The reference is on page 170 of Annex 2 as follows:

"Reference	Amendment	Sector Response and Proposed Action
RE7	*It is recommended that the DCCAE commission research on future demand for interconnection requirements, including the technical, regulatory and economic aspects.*	*Electricity Generation: The Department intends to commission research in 2017 into the merits of further electricity interconnection for Ireland. The study is proposed as a means to provide evidence for the further development of national policy on electricity interconnection. The study will embrace economic and technical aspects. In parallel with this national policy initiative, the CER has commenced a process that will see the development of a regulatory policy for electricity interconnectors. "*

Greenlink will further the objectives of the Plan by supporting renewable energy generation and facilitating the trading of renewable energy.

5.2.3.2 The Energy White Paper 2015

The White Paper "Ireland's Transition to a Low Carbon Energy Future 2015 – 2030" is the Government's most recent energy policy update. The framework acts to guide policy and the actions that the Government intends to take in the energy sector up to 2030. The White Paper does not set out detailed proposals or work packages but outlines high level government actions to support an energy transition to a low carbon energy system.

The White Paper addresses energy security in chapter 6.

"177. *The main energy security policy objective is to maintain the security of Ireland's energy system in the most cost effective manner.*

178 *This requires adequate infrastructure and diversity of energy supply that avoids over-dependency on any particular fuel, supplier, route or region.*

179 *A range of potential oil, gas and electricity infrastructure projects could enhance our energy security, in some cases with EU support as Projects of Common Interest (PCIs). Such projects would help to address interconnection and enhance security of supply, market integration and sustainability.*

180 *Achieving our sustainable energy goals and having fully integrated and well-functioning markets that promote investment will also impact positively on energy security.*

183 *Ireland will, therefore, work with its European partners to further develop a coordinated energy security policy, which will enhance Europe's collective strength in negotiations with energy suppliers. Through Ireland's membership of the EU and IEA, we will support policies that encourage diversification of energy supplies and facilitate more integrated energy markets."*

Section 6.7 presents a list of actions which include:

"*209….*

- *promoting and facilitating interconnection with other countries and regions (§240-243)"*

Chapter 7 of the White Paper is titled "*Enabling the Transition: Regulation, Markets and Infrastructure*". Interconnection is addressed in section 7.3.

"242 *The 2009 All Island Grid Study [31] showed that the current transmission network could safely absorb a level of renewable production generation of up to 42% of total electricity generated without affecting security of supply. Higher penetration levels would require significant additional interconnection or energy storage (§160-161). This continues to be the case and, given the Commission will report regularly to the European Council with the objective of arriving at a 15% target by 2030, further interconnection will be necessary. In addition to the proposed North-South transmission line, there are*

several initiatives underway which will lay solid analytical foundations for further interconnection:

- *a feasibility study on an interconnector with France [58]. The technical analysis commissioned to inform the development of the White Paper [16] suggests that this would enable the reduction of GHG emissions*
- *the North Seas Countries' Offshore Grid Initiative (NSCOGI) [59]*
- *the Irish-Scottish Links on Energy Study (ISLES) [60], which explored the potential for cross-border offshore renewable energy production between Northern Ireland, Scotland and Ireland*
- *decisions on further interconnection would be preceded by a full evaluation, including cost-benefit analysis."*

5.2.3.3 Climate Action Plan 2019 to Tackle Climate Breakdown

The Government published the Climate Action Plan 2019 to Tackle Climate Breakdown. The Plan sets out the actions the Government intends to take to address climate breakdown across sectors such as electricity, transport, built environment, industry and agriculture. Chapter 7 addresses electricity. In Section 7.2, the Plan sets out a target of 70% renewable electricity generation by 2030. The plan acknowledges that to achieve this will require greater interconnection with other countries, in addition to other measures.

"Achieving 70% renewable electricity by 2030 will involve phasing out coal- and peat-fired electricity generation plants, increasing our renewable electricity, reinforcing our grid (including greater interconnection to allow electricity to flow between Ireland and other countries), and putting systems in place to manage intermittent sources of power, especially from wind. This will require Obligated Energy Suppliers to work more closely with community and enterprise to ensure wider community gain."

The measures to deliver the 70% renewable electricity target are set out in Section 7.3, and in relation to harnessing renewable energy, include:

"Enhanced interconnection is planned, including the Celtic Interconnector to France and further interconnection to the UK. We will strengthen the policy framework to incentivise electricity storage and interconnection. Increased levels of storage and interconnection will be critical to absorbing high levels of renewable generation on to the system, as renewables require back-up which will have to be provided by quick response plant, storage or interconnection."

Greenlink will support the objectives of the Climate Action Plan because it will provide 500MW of interconnector capacity, which will support greatly increased renewable electricity generation.

5.3 Planning Framework

5.3.1 National Planning Framework Project Ireland 2040 (February 2018)

The Department of Housing, Planning and Local Government, on behalf of the Government, has prepared and published the National Planning Framework (NPF) under Project Ireland 2040, the overarching policy and planning framework for the social, economic and cultural development of our country.

One of the primary objectives of the NPF is to improve resource efficiency and promote the movement towards a low carbon economy. The aim is to achieve this by:

- **Sustainable Land Management and Resource Efficiency**

  Adopting the principles of the circular economy to enable more sustainable planning and land use management of our natural resources and assets

- **Low Carbon Economy**

  Accelerating action on climate change

- **Renewable Energy**

  Transition to a low carbon energy future.

National Policy Objective 52

"*The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the requirements of all relevant environmental legislation and the sustainable management of our natural capita*"'.

The proposed development supports this objective as it supports the growth of and integration of low carbon and renewable energy. This EIAR documents how the development will occur within environmental limits and have regard to the requirements of all relevant environmental legislation.

5.3.2 National Development Plan 2018 – 2027

The Department of Public Expenditure and Reform published the most recent National Development Plan 2018 - 2027 (NDP) in February 2018. In its introduction, the objective of the NDP is stated as follows:

"*A fundamental underlying objective of the National Development Plan is, therefore, to focus on continued investment to yield a public infrastructure that facilitates priorities such as high-speed broadband and public transport in better cities and in better communities. The public goods generated through investment in physical infrastructure will be critical to strengthening Ireland's human capital and to fostering the development of clusters in important growth areas in order to attract new investment.*"

The NDP sets out the strategic investment priorities to address the deficits in public capital infrastructure, which will underpin the implementation of the National Planning Framework.

The NDP identifies 10 national strategic outcomes which the Government intends to achieve in the lifetime of the plan. National strategic outcome 8 is the "*Transition to a Low-Carbon and Climate-Resilient Society*". To achieve this outcome the plan identifies various strategic investment priorities and investment actions. Under the sub-heading 2 "Decarbonising Energy", the plan states:

"Decarbonising Energy

Ireland's energy system requires a radical transformation in order to achieve its 2030 and 2050 energy and climate objectives. This means that how we generate energy, and how we use it, has to fundamentally change. This change is already underway with the increasing share of renewables in our energy mix and the progress we are making on energy efficiency.

Investment in renewable energy sources, ongoing capacity renewal, and future technology affords Ireland the opportunity to comprehensively decarbonise our energy generation. By 2030, peat and coal will no longer have a role in electricity generation in Ireland. The use of peat will be progressively eliminated by 2030 by converting peat power plants to more sustainable low-carbon technologies.

Investment in renewable energy must be complemented by wider measures to moderate growth in energy demand, diversify supply sources by greater interconnection to international energy networks, and increase adoption and utilisation of electricity storage and smart meters.

This will significantly increase our capacity to electrify heat and transport and promote less energy intensive/low-carbon heating solutions, including biomass and biogas.

Measures required to decarbonise energy generation and enhance energy efficiency include those listed below.

- *Decarbonising electricity generation.*
- *Develop further interconnection to increase energy security and facilitate more variable electricity generation on the grid…."*

5.3.3 Regional Spatial and Economic Strategy for the Southern Region 2020

The Regional Spatial and Economic Strategy came into effect on 31st January 2020. The Southern Region comprises counties Cork, Clare, Kerry, Limerick, Tipperary, Waterford, Carlow, Kilkenny and Wexford. The Southern Regional Spatial and Economic Strategy sets out a 12-year strategic development framework for the Southern Region, with chapters dealing with Strategic Vision, Economy, Environment including responding to climate change, Connectivity, Quality of Life, Water and Energy Utilities and implementation, Monitoring and Evaluation. The Strategy establishes a broad framework for development and the way in which the Region's society, environment, economy and the use of land should evolve.

The overarching purpose of the Strategy is to support the programme for change set out in Project Ireland 2040, the National Planning Framework, and the National Development Plan (NDP 2018-2027) and Government Economic policies, and to ensure coordination between city a county development plans and local enterprise and community plans.

The Strategy is to build a strong, resilient, sustainable region through "*safeguarding and enhancing our environment through sustainable development, transitioning to a low carbon and climate resilient society*" and "*provision of infrastructure and services in a sustainable, plan and infrastructure led manner to ensure the sustainable management of wastewater and other environmental resources*".

The policies in the Strategy are structured under Regional Policy Objectives (RPOs) and MASP (Metropolitan Strategic Area Plan) Objectives.

Greenlink aligns with several objectives of the Strategy's RPOs.

Overall Strategy no. 8 is stated on page 27 as follows:
"*Safeguarding and enhancing our environment through sustainable development, prioritising action on climate change across the region, driving the transition to a low carbon and climate resilient society.*"

The sector specific RPOs relating to action on climate change and supporting low carbon energy development include:

RPO 87 – Low Carbon Energy Future

"The RSES is committed to the implementation of the Government's policy under Ireland's Transition to a Low Carbon Energy Future 2015-30 and Climate Action Plan 2019. It is an objective to promote change across business, public and residential sectors to achieve reduced GHG emissions in accordance with current and future national targets, improve energy efficiency and increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport and agriculture."

RPO 95 - Sustainable Renewable Energy Generation

"*It is an objective to support implementation of the National Renewable Energy Action Plan (NREAP), and the Offshore Renewable Energy Plan and the implementation of mitigation measures outlined in their respective SEA and AA and leverage the Region as a leader and innovator in sustainable renewable energy generation.*"

RPO 96 – Integrating Renewable Energy Sources

"It is an objective to support the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure to integrate a renewable energy sources and ensure our national and regional energy system remains safe, secure and ready to meet increased demand as the regional economy grow."

RPO 99 - Renewable Wind Energy

"*It is an objective to support the sustainable development of renewable wind energy (on shore and off shore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.*"

RPO 103 – Interconnection Infrastructure

"*It is an objective to support the sustainable development of interconnection infrastructure, in particular the potential for the sustainable development of an international connection between Ireland and France in the Region.*"

Greenlink will further these objectives of the Strategy as it will support the growth and integration of low carbon energy and renewable energy generation. Greenlink will be sustainable interconnector i between Ireland and the United Kingdom.

5.3.4 Wexford County Council Development Plan 2013 - 2019

There are several objectives in the Wexford County Development Plan 2013 – 2019, the current plan, which are supported by the proposed development, and in particular, Objective EN04:

Objective EN04

"To facilitate the provision of and improvements to energy networks in principle, provided it can be demonstrated that:

- *The development is required to facilitate the provision or retention of significant economic or social infrastructure;*
- *The route proposed has been identified with due consideration for social, environmental and cultural impacts;*
- *The design is such that will achieve least environmental impact consistent with not incurring excessive cost;*
- *Where impacts are inevitable, mitigation features have been included;*
- *Proposals for energy infrastructure should be assessed in accordance with the requirements of Article 6 of the Habitats Directive.*"

Greenlink complies with the objective of the County Development Plan. Greenlink will improve the energy network in Ireland and will support significant low carbon generation development. Greenlink has been designed and will be constructed with due consideration for social, environmental and cultural impacts. As described elsewhere in the EIAR, possible social, environmental and cultural effects have been identified and will be mitigated, where feasible. The proposed development will cause the least environmental impact consistent with not incurring excessive costs.

5.3.5 National Marine Planning Framework Consultation Draft

In November 2019 the Department of Housing, Planning and Local Government issued the National Marine Planning Framework (NMPF) Consultation Draft. The NMPF has been prepared in response to EU Directive 2014/89/EU establishing a framework for maritime spatial planning, (MSP Directive), which was adopted in July 2014. The Directive obliges all coastal Member States to establish maritime spatial plans by 2021.

The expected date for adoption of the NMPF is late 2020.

Once finalised, the NMPF will be at the top of a hierarchy of plans and policies for the marine area. It will be equivalent to, and sit alongside, the National Planning Framework and National Development Plan on land.

The NMPF covers all of Ireland's maritime area, including:

- Internal waters
- Territorial sea
- Exclusive economic zone (EEZ)
- Continental Shelf.

The area covered is 490,000 km^2 from high water mark seaward to over 200km in parts.

In the first round of preparation of the NMPF, there will be a single plan for entire Irish marine area. It is envisaged that sub-national (regional and local) plans will be part of future iterations. Three regions are currently envisaged.

Once the NMPF has been adopted, it will apply to all projects located in the marine area or which could have an impact on the marine area. Consent authorities and regulators will have to have regard to the objectives of the NMPF in decision making.

The draft NMPF has one overarching objective and 36 overarching policies. The 36 overarching marine planning policies are grouped into 10 environmental – ocean health topics, seven social – engagement with the sea topics and two economic – thriving marine economy topics. In addition to the overarching objective and policies, the draft NMPF has policies for the individual economic sectors. There are policies for five energy sectors and 11 other sectors.

The purpose of the overarching objective and policies is explained in paragraph 3.1.

"3.1 The Overarching Marine Planning Policies (OMPPs) presented in this chapter apply to all proposals capable of having impacts in the maritime

area. They apply equally to proposals that would be located in the maritime area, and to proposals that would be located outside of the maritime area but capable of having an impact in the maritime area. An example of the latter would be land-based development in a port that would support an offshore activity such as renewable energy."

The overarching marine planning policies are not stand alone. For any project, the overarching marine planning policies, the project specific sectoral policies and other relevant sectoral policies should be considered together.

Energy – transmission is one of the key sectors/activities, for which plan has specific policies. Four objectives and four planning policies in relation to energy transmission are stated in Chapter 9.

Objectives

- Support Ireland's decarbonisation journey through diversification of supply options increased. (sic)
- Strengthen the policy framework to incentivise interconnection.
- Provide enhanced security of energy supply for Ireland in the short and medium term, in accordance with the Government White Paper on Energy and Government Action Plan to Tackle Climate Disruption.
- Ensure good regulatory practices in the provision of gas and electricity transmission infrastructure, according to international best practice.

Transmission Policy 1: Gas or electricity transmission proposals that maintain or improve the security and diversity of Ireland's energy supply, including interconnectors, should be supported.

Transmission Policy 2: Proposals for activities that are in or could affect energy transmission proposals in sites held under a permission or that are subject to an ongoing permitting or consenting process for energy transmission proposals should demonstrate that they will in order of preference:

a) avoid,

b) minimise,

c) mitigate adverse impacts,

d) if it is not possible to mitigate significant adverse impacts, proposals should state the case for proceeding.

Transmission Policy 3: Decisions on transmission developments should be informed by consideration of space required for other activities of national importance described in the NMPF.

Transmission Policy 4: Where possible, opportunities for land-based, coastal infrastructure that is critical to and supports energy transmission should be prioritised in plans and policies.

By providing additional power supply options, Greenlink will support Ireland's decarbonisation journey and will enhance the security of power supply in the short and medium term, thus furthering the objectives of the draft NMPF.

5.4 Conclusion on Planning and Policies

EU and Irish national energy policy and climate action plans, discussed above, identify greater interconnection of the Irish electricity grid with other countries as a key requirement to facilitate increased renewable electricity generation. Greenlink will provide significant new interconnection capacity, which will support the objectives of these plans and policies.

By providing additional interconnection for the Irish electricity grid, Greenlink will also further the objectives of the National Planning Framework, the National Development Plan, the Regional Spatial and Economic Strategy for the Southern Region and the Wexford County Development Plan. Greenlink will enhance the security of the energy supply, underpin the decarbonising of energy generation in Ireland and bring economic benefits by increasing competition in the Irish electricity market.

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