

GREENLINK

GREENLINK INTERCONNECTOR

CONCEPT OF PUBLIC PARTICIPATION (IRELAND)



GREENLINK CPP IRELAND REV1 | 07/10/19

GREENLINK

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## 0. DOCUMENT RELEASE FORM

# Greenlink

Greenlink CPP IRELAND Rev 1

*Greenlink Interconnector*

CONCEPT OF PUBLIC PARTICIPATION (IRELAND)

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Rev No	Date	Reason	Author	Checker	Authoriser
Rev0	12/03/18	Initial document	Tom Brinicombe		
Rev1	7/10/2019	Update on project	Rónán ÓhÓgartaigh	Tom Brinicombe	Angus Norman

## 1. INTRODUCTION

The Greenlink Interconnector project has been designated as a Project of Common Interest (PCI) under European Regulation 347/2013 and as such the application has to be accompanied by a Concept of Public Participation to ensure that consultation with the public is of an appropriate standard, and is meaningful and central to the development of the PCI project.

The relevant European, Irish and UK guidelines can be found in Appendices 1, 2 and 3.

This document will provide an introduction to the Greenlink Interconnector project and outline the public consultation strategy to be undertaken during the development process in Ireland.

The public consultation strategy aims to ensure that the public has visibility of the Greenlink proposal as it develops and input into the project as it evolves.

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### 1.1 PROJECT OVERVIEW

Greenlink is a proposed electricity interconnector with a nominal capacity of 500MW linking the existing electricity grids in Ireland and Great Britain (Fig 1-1). It will consist of two converter stations, one close to the existing substation at Great Island in County Wexford (Ireland) and one close to the existing Pembroke substation in Pembrokeshire (Wales), connected by electricity cables running underground (onshore) and under the sea (offshore).

The onshore project elements in Ireland will consist of a landfall site at Baginbun Beach in County Wexford, a converter station close to the existing power station at Great Island in County Wexford and high voltage direct current (HVDC) electricity cables with a fibre optic cable for control and communication purposes running underground from the landfall site to this converter station.

The onshore project elements in Wales will consist of a landfall site at Freshwater West, a converter station close to the existing Pembroke power station in Pembrokeshire (and an associated permanent



access road) and HVDC electricity cables running underground from the landfall site to this converter station.

The offshore project element will consist of HVDC electricity cables and a fibre optic cable running under the sea between the landfall sites in Ireland and Wales.

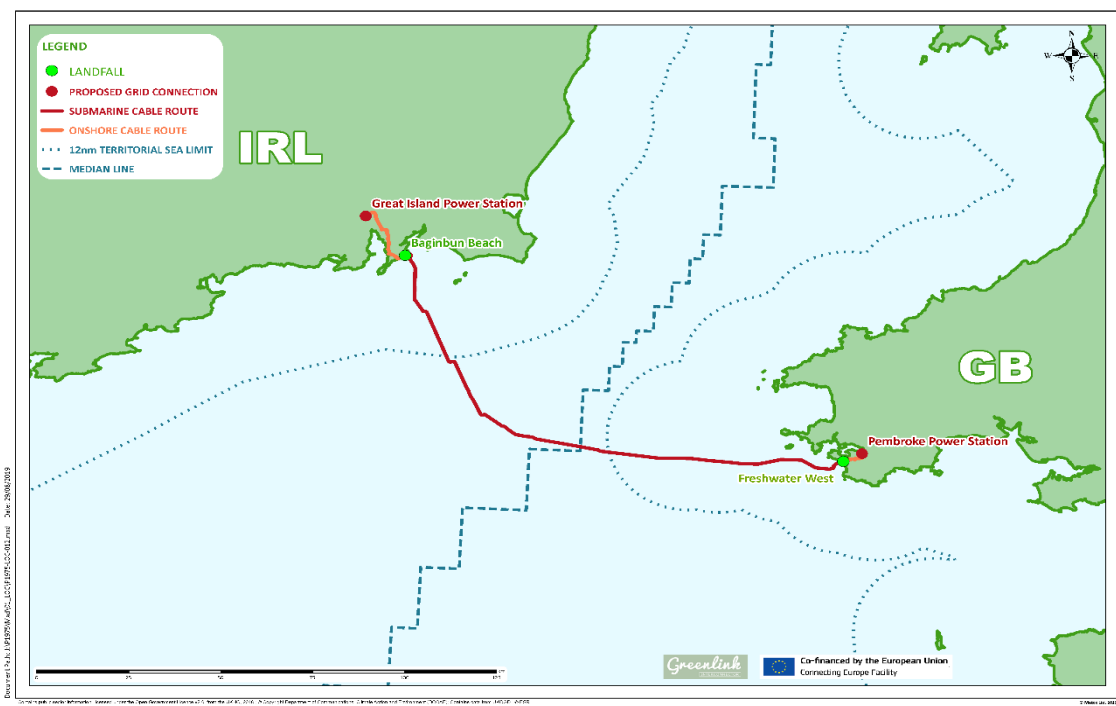
The Greenlink interconnector will link the Irish and Welsh/GB electricity networks and the markets that they serve. The project is independent from the power generation sources that will generate the power to be transmitted through the interconnector; the interconnector will utilise whatever sources of power are supplied to those networks from time to time. The interconnector will facilitate power transfer in both directions.

The design of the project has evolved to date through constraints assessments, options appraisal, environmental and technical surveys and consultation with relevant stakeholders.

Greenlink will be of key strategic importance providing significant additional interconnection between Ireland, Great Britain and onwards to mainland Europe. It will provide additional transmission network capacity, reinforcing the existing electricity grids in south-east Ireland and southern Wales and contributing to each country’s strategic interconnection objectives. The development and construction of Greenlink will deliver increased security of supply, facilitate fuel diversity and greater competition and will ultimately provide significant benefits to consumers in Ireland, Wales, Great Britain as a whole and mainland Europe. It is recognised that there are significant benefits to be accrued both in Ireland and Great Britain from the provision of additional interconnection of the two national electricity grids.

In Wales, a connection agreement has been signed with National Grid for a grid connection at the Pembroke substation, and Greenlink is listed on the EirGrid application queue as TG288 for a grid connection at the Great Island substation.

Figure 1-1 Greenlink Overview



## 1.2 THE DEVELOPER

The Greenlink project is being developed by Greenlink Interconnector Limited, which is owned jointly by Element Power Holdings, part of Hudson Sustainable Investment, and Partners Group on behalf of its clients. Hudson Sustainable Investment is an independent investment management firm with a strong track record and expertise in investing in and developing sustainable energy infrastructure projects in Ireland, the UK and internationally. Partners Group is a global private markets investment management firm with €73 billion in investment programs under management in private equity, private real estate, private infrastructure and private debt.

## 1.3 PROJECT NEED

Ireland is currently connected to the UK by two 'two-way' electricity interconnectors, which provide a means of transferring electricity between the two countries – the East West Interconnector (EWIC), which connects County Dublin to North Wales, and an interconnector between Moyle, County Antrim, Northern Ireland and Ayrshire, Scotland. However, the challenges faced by the British, Irish and wider European energy systems are driving the need for additional interconnectors between Ireland and the UK and within Europe as a whole. There is strong support within Europe for additional interconnection.

The 'Energy Union' is a strategy launched by the European Commission on 25th February 2015 with the aim of ensuring that European countries have access to secure, affordable and climate-friendly energy. This strategy is driving a fundamental transition towards more innovative ways to produce, transport and consume energy, and towards different approaches in the design and implementation of energy policy.

A key aim of the strategy is to increase the physical interconnectedness of the energy grids (both gas and electricity) of European and neighbouring countries. This includes building more energy interconnectors between European countries, with the target of meeting 10% interconnectedness by 2020 and to reach 15% by 2030.

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

Greenlink has been given the status of a European Union 'Project of Common Interest' (PCI), making it one of Europe's priority energy infrastructure projects.

Greenlink will have key strategic importance providing significant additional interconnection between the electricity grids of Ireland, the UK and mainland Europe. As well as at the European level, Greenlink is also expected to provide benefits at the national level. For both Ireland and the UK, it will provide additional transmission network capacities, reinforcing the existing electricity grids in south-east Ireland and south Wales by creating an increasingly meshed network, and thus improving security of supply, as well as contributing to each country's strategic interconnection objectives.

The construction of Greenlink will also deliver increased security of supply by diversifying energy sources in both Ireland and the UK, and greater competition in the provision of electricity, ultimately providing significant benefits to consumers in Ireland, the UK and mainland Europe.

Greenlink's location in respect of the existing EWIC and Moyle interconnectors will also enable EirGrid and National Grid to increase the use of these connections to manage power flows on their networks, reduce network constraints and hence reduce costs of operating their transmission systems, benefiting consumers both in Ireland and the UK.

Greenlink is privately financed and will provide significant capital for a large infrastructure project that will generate jobs and wider economic benefits along the local and regional supply chains. In Co. Wexford there will be around 250 jobs during construction and around 20 permanent jobs once the project is operational. Knock-on benefits to the region will be through contracts for a range of services and products and we will be looking to maximise the benefits to the local supply chain (see section 2.3.2 below).

The Greenlink interconnector will support the achievement of the Government's goals on decarbonisation and green growth, which offer significant economic and environmental benefits to Ireland. While the interconnector is technology agnostic, greater interconnection will be valuable in facilitating the build-out of renewable energy generation on both sides, particularly the growth of offshore wind, as it will allow surplus renewable power to be exported between Ireland and Great Britain. Infrastructure like Greenlink is therefore essential to facilitate the growth of the low carbon economy and attract green investment.

Greenlink will therefore support the Irish government's Climate Action Plan and its target to achieve 70% of electricity from renewable sources by 2030.

In summary, the main benefits from the Greenlink Interconnector are expected to be:

- Strategically placed to reinforce the transmission grid in the south of Ireland by its connection to Wales, creating synergy with existing EWIC and Moyle interconnectors, and by connecting the centre and north of Ireland to the UK;
- Providing reinforcement to transmission boundaries in south Wales;
- Providing additional import and export capacity for the island of Ireland and the UK;
- Greater market integration;
- Greater sharing of reserve, generation capacity and ancillary services between the UK and the island of Ireland;
- Jobs and regional economic benefits from private investment in a large infrastructure project; and
- Reduction of carbon emissions and integration of high levels of renewable energy generation.

## 2. CONSULTATION

Consultation is the process by which the input of various stakeholders is sought on matters affecting them. It is an important part of the development process. In the context of infrastructure development, its key goals are to increase transparency and a wider involvement in large-scale projects, by creating a dialogue with key stakeholders with the aim of improving these projects with stakeholder input.

Developers are responsible for ensuring public consultation forms a core part of their development projects and that the public has access to relevant information and can influence the decision-making process as appropriate. They must proactively engage the public in order to facilitate a meaningful and genuine consultation.

The Greenlink project team wants to ensure that the local community is consulted and involved throughout the development process of the Greenlink project. The consultation process will be tailored to the specific needs of the local community and delivered in a relevant and accessible manner.

## 2.1 OUR APPROACH

Greenlink recognises that any type of development can have varying degrees of impact and interest for local communities and is committed to promoting an open and honest dialogue with the local community throughout the development process.

Greenlink has sought to commence a public dialogue during the early stages of development, before detailed environmental work has been carried out. This will enable the local community to watch the project evolve and understand the various complexities and detailed studies involved in developing and constructing a subsea interconnector.

By involving the local community throughout the development process and providing information as it becomes available, Greenlink will work to ensure that the local community is part of the development process.

## 2.2 IDENTIFICATION OF STAKEHOLDERS

A key part of planning any consultation is to identify the relevant key stakeholders. Key stakeholders can include community groups, local residents, local interest groups, constituency politicians, councillors and local media.

It is expected that the list of stakeholders will grow throughout the consultation process, as more groups and stakeholders become aware of the project. We will ensure that project information is provided to these groups in a timely and transparent manner.

Due to the Concept of Public Participation (CPP) concentrating on public consultation, the considerable consultation to be undertaken with statutory consultees will not be included in this document. Input from statutory consultees will be captured within the documentation forming the final planning application.



Greenlink recognises that different stakeholders will have varying levels of interest in the project. To assist in developing a meaningful consultation strategy, stakeholders will be assigned a different ‘consultation level’, based on expected/perceived impacts and levels of interest in the project. Consultation levels are explained below:

- **Consultation Level 1** – must be informed and proactively engaged throughout, high level of interest expected
- **Consultation Level 2** – must be kept informed and engaged as per responses, medium level of interest expected
- **Consultation Level 3** – must be kept informed and engaged as per responses, low level of interest expected

### 2.2.1 ELECTED REPRESENTATIVES

A number of elected representatives have been and will continue to be consulted as part of the Greenlink consultation programme in Ireland.

Relevant county councils and county councillors from the local planning authority are key local stakeholders, directly representing local communities at the local political level, including:

- Local authority – county councillors; and
- Nationally elected representatives – TDs.

#### 2.2.1.1 LOCAL AUTHORITY - COUNTY COUNCILLORS

The local authority for the region is Wexford County Council. Greenlink believes that it is important that county councillors from relevant districts have access to accurate project information and a clear point of contact within the project team to raise queries and make suggestions regarding the development of the project.

The councillors within the New Ross Municipal District will be proactively and directly consulted.

**Table 2-1 Priority district councillors within Wexford County Council for consultation**

District	Consultation Level	Notes
New Ross Municipal District	1	Relevant district for landfall, cable route and converter station
Gorey Municipal District	3	Not expected to be affected but will have an interest in a major project taking place in the area



District	Consultation Level	Notes
Enniscorthy Municipal District	3	Not expected to be affected but will have an interest in a major project taking place in the area
Borough District of Wexford	3	Not expected to be affected but will have an interest in a major project taking place in the area

Figure 2-1 New Ross Municipal District



Source: Wexford County Council website

2.2.1.2 NATIONALLY ELECTED REPRESENTATIVES

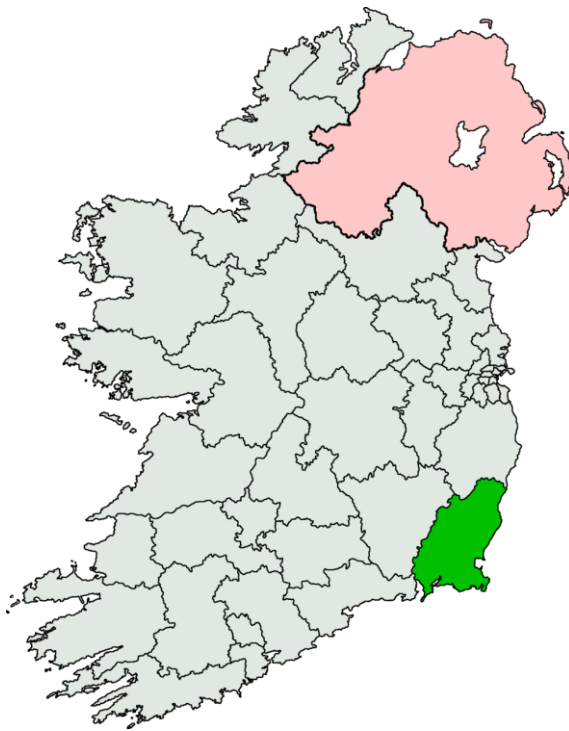
Greenlink is a major project offering national as well as regional and local benefits and constituents will regularly look to their nationally elected representatives for guidance, support and advice. With

this in mind elected representatives at the national level will also be consulted, with representatives from the Wexford constituency being included in the Greenlink consultation programme:

**Table 2-2 National elected representatives for consultation**

TD	Consultation Level	Notes
Paul Kehoe	2	Fine Gael
Michael W. D’Arcy	2	Fine Gael
Brendan Howlin	2	Labour
Mick Wallace	2	Independents 4 Change Elected MEP. By-election for TD to take place.
James Browne	2	Fine Fail

**Figure 2-2 Wexford constituency**



Source: Wikipedia

### 2.2.2 NEIGHBOURING RESIDENTS

The input of neighbouring residents is considered by Greenlink to be vitally important. Residents living in the vicinity of the proposed converter station location, the landfall site and those living along the underground cable route (between the landfall site and the converter station site) will be consulted. Consultation will be carried out in the local area with information being made available to all residents along the potential routes, landfall and converter station sites.

### 2.2.3 COMMERCIAL AND RECREATIONAL USERS

Greenlink recognises that there are numerous members of the local community who are commercial and/or recreational users of the area in which Greenlink is looking to install the cables and converter station. Greenlink is keen to understand any concerns and opportunities arising from the project in respect of these users. In order to fully assess potential impacts Greenlink will seek views from local commercial and recreational users to understand the current baseline and identify the assessment and development work required to ensure that the project is designed to incorporate the interests of existing users.

Commercial/recreational users include:

- tourism interest;
- farmers;
- fishermen;
- anglers; and
- walkers.

This list is not exhaustive and further users are likely to be identified and consulted as the consultation progresses.

## 2.3 SUBJECT AREAS

Greenlink will seek input into several key subject areas to incorporate into the development process moving forward and ensure that the Greenlink proposal is being developed to the highest standard.

Subject areas to be consulted on will include:

- environmental;
- local supply chain;
- logistics and construction programme; and
- existing land use.

Further subject areas will be included as they arise during the consultation process.

### 2.3.1 ENVIRONMENTAL

As part of the project development process Environmental Scoping Reports have been sent out to relevant stakeholders for the Marine and Onshore components of the project. These reports outline the proposed scope and methodology of assessment and survey work to be carried out during the

development of the project. The feedback from stakeholders is then incorporated into the survey and assessment programme.

Local stakeholders are included within the circulation of the report and Greenlink will seek an ongoing dialogue with all stakeholders throughout the development process. Greenlink will also seek to identify additional local environmental interest groups and additional specific environmental issues throughout the public consultation. Greenlink will seek to continually engage with these groups to ensure that the environmental work carried alongside the application is as robust as possible and considers all environmental issues and concerns raised.

As the design evolves, Greenlink will be seeking feedback from the public on relevant changes, including the visual appearance of the converter station and the proposed landscaping and screening planting.

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### 2.3.2 LOCAL SUPPLY CHAIN

The development of significant infrastructure projects entails substantial capital outlay from developers and their investors, the majority of which is spent during the construction period. Most of this outlay is spent on purchasing equipment and materials (e.g. converter stations and subsea cables) with the rest mainly spent on contractors for the construction of the infrastructure. The construction works will be coordinated by one main contractor who will sub-contract various components to specialist companies, e.g. cable laying, pouring foundations etc.

Construction work on the Greenlink Interconnector is expected to lead to notable expenditure in Ireland. A significant amount of work due to take place at the landfall, cable and converter station sites will require skills and experience available from contractors found in the local area.

The types of services that could be locally sourced include:

- transportation – equipment and personnel;
- materials, e.g. supplying and pouring concrete;
- electrical connection;
- civil engineering activities and earthworks, e.g. tracks and hard-standing, foundations, trench digging for cables etc;
- hospitality and catering;
- office and cleaning supplies;
- site services, e.g. portacabins and portaloos;
- site security;
- fencing; and
- waste disposal.



Greenlink is committed to maximising the use of locally based contractors and personnel during the construction and operational phases of the project. In order to deliver this, Greenlink will develop a Local Business Support Scheme, which will be aimed at maximising the potential for local business involvement during the construction and operation of the project. As a part of this we will work to engage with local suppliers during the consultation programme and liaise with local economic bodies to ensure that a dialogue is established with local businesses.

### 2.3.3 LOGISTICS AND CONSTRUCTION PROGRAMME

The construction phase of a major project includes numerous vehicle movements including workers travelling to site and equipment and material deliveries. A transport impact assessment will be completed as part of the planning application and Greenlink will seek input on potential issues of road safety and traffic disruption with the aim of minimising local impacts.

Installation of the underground cables also has the potential to cause disruption and Greenlink will work with the local community to develop a programme to minimise any impacts.

As part of the planning application process, an outline Traffic Management Plan (TMP) will be put together that will outline measures for managing and mitigating the construction traffic caused by Greenlink. We will consult the local community on a draft TMP to ensure that all considerations of local amenity have been incorporated and that members of the local communities are satisfied with the mitigation measures being proposed.

### 2.3.4 EXISTING LAND USE

Greenlink will seek to build a thorough understanding of the current commercial and recreational users of the sites and develop and maintain a dialogue with them to ensure that their interests are incorporated into the design and construction programme as the development progresses.

## 2.4 CONSULTATION TOOLS

Greenlink will use a variety of consultation tools throughout the consultation programme. The precise deployment of the tools will reflect the requirements of stakeholders and feedback as the consultation progresses.

Consultation tools will include:

- project brochure;
- project website;
- community email;
- public exhibitions;
- one-to-one engagement;
- roundtable meetings and presentations;



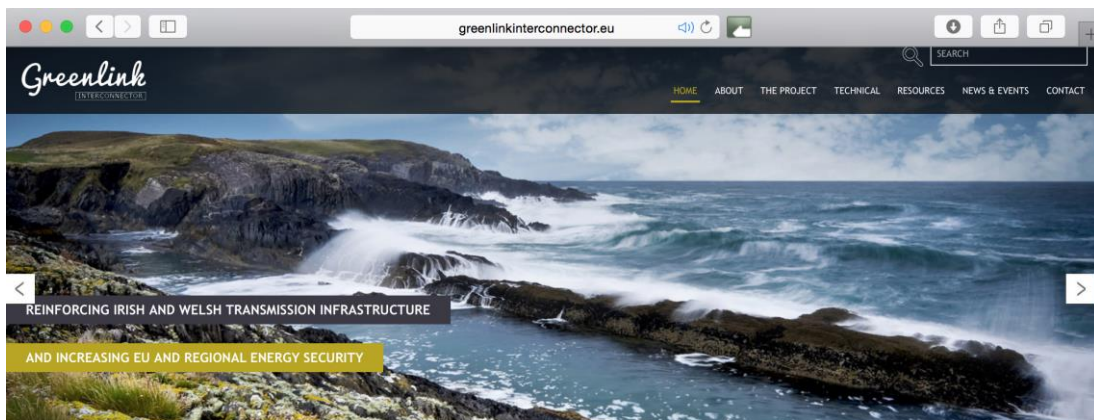
- house visits;
- newsletters;
- field trips; and
- local and social media.

### 2.4.1 PROJECT BROCHURE

In accordance with PCI guidance Greenlink will produce a brochure of less than 15 pages to provide a summary of the project timetable, studies, route options, opportunities, project evolution and possible project mitigation measures. This will be made available to all stakeholders in hard format and also published on the project website in a downloadable format. It will be updated at regular intervals to coincide with key phases of the development.

### 2.4.2 PROJECT WEBSITE

A dedicated project website has been published [www.greenlink.ie](http://www.greenlink.ie). The website offers stakeholders key project information and the latest development news, including details of consultation events and opportunities. It also includes full contact details, including an online contact form, and a comprehensive set of Frequently Asked Questions (FAQs). The website will play a central role in the consultation plan, as it provides all key project information in one accessible location and creates a basis for discussion between different stakeholders. Regular communication via the project website will help boost awareness and transparency among stakeholders.



#### GREENLINK INTERCONNECTOR

Greenlink is a proposed interconnector linking the power markets in Great Britain and Ireland.

**TECHNOLOGY:** Greenlink will employ high voltage direct current voltage source converter (HVDC VSC) technology to link the two power systems. HVDC has been selected over an alternating current (AC) connection, because AC is technically difficult over this distance. HVDC has lower unit costs, can be much more easily controlled according to trading and market requirements, and has much lower losses. In addition the Irish and GB grid systems are not synchronised and therefore can only be connected via HVDC. The VSC technology (as compared to older current source converters) requires less reinforcement to the AC grid at the connection points, as well as allowing very rapid change of flow direction and reactive power.

This flexibility is highly valued by system operators when managing grid stability and in providing ancillary system services. The connection between the new converter stations will all be underground and subsea cables with no new overhead lines.

**PRE PLANNING:** The development team is currently carrying out initial feasibility work for the Greenlink interconnector between Pembroke, Pembrokeshire, in Wales, and Great Island, County Wexford in Ireland. Throughout the pre planning phase of the project we will be consulting all key stakeholders to ensure that they can input into the development process. The project will require planning permission.





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### 2.4.3 COMMUNITY EMAIL AND PHONE LINE

It is important for members of the community to have a direct communication route to channel their queries, comments and concerns. To facilitate this, Greenlink will ensure that contact details are clearly shown on all consultation literature and the website, and that an email and phone number is provided to local stakeholders for the relevant contact in each jurisdiction.

All email and phone calls will be responded to in a prompt and professional manner.

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### 2.4.4 PUBLIC EXHIBITIONS

Public exhibitions will take place at key stages of the development programme to present the latest details of the project and enable members of the local community to meet the project team in person. Project information will be provided via a range of media at these consultation events – exhibition boards, leaflets and third-party materials.

Events will be held in public locations convenient for the local community and publicised locally with posters, letters to targeted stakeholders, press releases, adverts in the local media and through social media.

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### 2.4.5 ONE-TO-ONE ENGAGEMENT

One-to-one engagement will be used to discuss specific areas of concern with participating parties. These meetings will be particularly useful for focused discussions with leaders of local stakeholder groups in the planning and permitting stages of development. It will also be used to address individual residents' concerns when requested.

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### 2.4.6 ROUNDTABLE MEETINGS AND PRESENTATIONS

Roundtable meetings will allow formal discourse among a number of representatives from various stakeholder groups to discuss specific areas of the project and gain varied inputs. We will present information on the project and its development (using visual tools such as slides and plans) where appropriate and deemed useful.

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### 2.4.7 HOUSE VISITS

Residents living near a proposed project often have a number of concerns pertaining to issues of residential amenity and other areas such as perceived impacts on health and house prices. Specific households may require additional consultation care due to perceived high impacts from a proposal.

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Directly engaging with stakeholders via house visits is an ideal opportunity for both informational and participatory communication.

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#### 2.4.8 SITE VISITS

Site (or ‘field’) visits are explorative in nature and can help familiarise local stakeholders with the technical details of the project and to envisage the proposals in situ. We will routinely offer these to stakeholders such as local political representatives.

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#### 2.4.9 SOCIAL MEDIA

We use our Twitter account @Greenlink\_IC to provide regular updates on the project, including news of milestones, policy developments and details of upcoming public consultation events.

We use LinkedIn to provide news of the project for a more commercial stakeholder audience, such as potential contractors.

### 2.5 CONSULTATION TO DATE

Greenlink is currently in the development phase. Consultation to date has been extensive and has covered:

- Statutory consultees and key users. The aim of this work has been to understand the existing constraints and develop a broad design to form the basis of a high-value public consultation.
  
- Local and nationally elected representatives. We have provided regular written updates on the project and offered one-to-one and group meetings to brief them on progress. We have invited them to the local public exhibitions.

Roundtable meetings and presentations have taken place to date with Wexford County Council’s New Ross District Councillors on the following dates:

- 20<sup>th</sup> June 2018
  - 11<sup>th</sup> September 2019
- 
- Neighbouring residents and commercial and recreational users. We have held five public exhibitions in County Wexford to date:
    - June / July 2018: Fethard and Duncannon
    - January 2019: Fethard and Duncannon
    - March 2019: Ramsgrange



The full list, including dates, location and materials provided at the event, can be found on our website [here](#). These were advertised in the local media, on social media and in local locations.

We have contacted all residents along the onshore cable route, including a letter inviting them to their local exhibition and offering meetings to address any questions. We have responded to a number of enquiries from the public received through our website or directly to our local representative.

- Consultation materials produced so far include:
  - three issues of the project [brochure](#);
  - information [boards](#) for the public exhibitions,;
  - printed maps and diagrams;
  - event adverts;
  - articles and updates in the media (including social media);
  - website content; and
  - a detailed set of FAQs.

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### 2.5.1 WEBSITE

The [www.greenlink.ie](http://www.greenlink.ie) website (then named [www.greenlinkinterconnector.eu](http://www.greenlinkinterconnector.eu)) was published on 21<sup>st</sup> April 2016. The website is outlined in 2.4.2. The website has resulted in a small number of enquiries.

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### 2.5.2 COMMERCIAL/RECREATIONAL USERS

A dialogue has been established with the Port of Waterford to ensure that the project takes shipping and ongoing activity in the Port into consideration as the project evolves.

Greenlink appreciates that there are a number of users that are yet to be consulted and will seek to establish a dialogue with all stakeholders as the formal public consultation and scoping phases commence.

## 2.6 RESOURCING

Members of the Greenlink development team have the expertise to engage and communicate with a variety of stakeholders on a range of development issues.

We have designated local and regional representatives in the two jurisdictions: a Planning and Permitting Manager for Ireland and a Planning and Permitting Manager for Wales. This allows local, regional and national stakeholders to have a clear point of contact with the requisite local knowledge.

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## 2.7 CONSULTATION PROGRAMME

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**Table 2-3 Details of full project life consultation activity**

Stage	Development Details	Consultation Details
Site development	A variety of technical and environmental assessments; commencement of the planning process: screening, scoping and assessment.	With the commencement of the official planning process, community consultation kicks off, consultation on-going over the development period.
Planning applications	Planning applications submitted for the various components of the Greenlink project. In Ireland, applications are submitted to An Bord Pleanála for the converter station and cable route and to the Department of Housing, Planning and Local Government for the Irish marine elements of the project.	Stakeholders are fully aware of the content of the planning applications due to thorough consultation taking place prior to submission.
Determination	Planning applications are determined. In Ireland the application will be determined by An Bord Pleanála	Stakeholders are informed of the planning decisions.
Post-planning	Pre-commencement planning conditions are discharged. Construction preparation takes place.	Community is engaged on key practical issues, such as traffic management plans and timing of works.
Construction	Construction and installation works take place as per the agreed construction programme.	Community is kept informed of progress; project team responds to construction-related queries and issues.
Operational	The Greenlink project becomes operational.	Stakeholders are informed of the successful completion of the project and its operational status.

### 3. APPENDICES

#### 3.1 APPENDIX 1 – EUROPEAN GUIDELINES

*Source*

REGULATION (EU) No 347/2013 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL  
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:115:0039:0075:en:PDF>

**Article 9**

**Transparency and public participation**

1. By 16 May 2014, the Member State or competent authority shall, where applicable in collaboration with other authorities concerned, publish a manual of procedures for the permit granting process applicable to projects of common interest. The manual shall be updated as necessary and made available to the public. The manual shall at least include the information specified in Annex VI.1. The manual shall not be legally binding, but it may refer to or quote relevant legal provisions.
  
1. Without prejudice to any requirements under the Aarhus and Espoo Conventions and relevant Union law, all parties involved in the permit granting process shall follow the principles for public participation set out in of Annex VI.3.
  
1. The project promoter shall, within an indicative period of three months of the start of the permit granting process pursuant to Article 10(1)(a), draw up and submit a concept for public participation to the competent authority, following the process outlined in the manual referred to in paragraph 1 and in line with the guidelines set out in Annex VI. The competent authority shall request modifications or approve the concept for public participation within three months; in so doing, the competent authority shall take into consideration any form of public participation and consultation that took place before the start of the permit granting process, to the extent that such public participation and consultation has fulfilled the requirements of this Article.  
(SEP:SEP) Where the project promoter intends to make significant changes to an approved concept, it shall inform the competent authority thereof. In that case the competent authority may request modifications.
  
1. At least one public consultation shall be carried out by the project promoter, or, where required by national law, by the competent authority, before submission of the final and complete application file to the competent authority pursuant to Article 10(1)(a). This shall be without prejudice to any public consultation to be carried out after submission of the request for development consent according to Article 6(2) of Directive 2011/92/EU. The public consultation shall inform stakeholders referred to in Annex VI.3(a) about the project at an early stage and shall help to identify the most suitable location or trajectory and the relevant issues to be addressed in the application file. The minimum requirements applicable to this public consultation are specified in Annex VI.5.  
(SEP:SEP) The project promoter shall prepare a report summarising the results of activities related to the participation of the public prior to the submission of the application file, including those activities that took place before the start of the permit granting process. The project promoter shall submit that report together with the application file to the competent authority. Due account shall be taken of these results in the comprehensive decision.
  
1. For projects crossing the border of two or more Member States, the public consultations pursuant to paragraph 4 in each of the Member States concerned shall take place within a period of no more than two months from the date on which the first public consultation started.
  - For projects likely to have significant adverse cross-border impacts in one or more neighbouring Member States, where Article 7 of Directive 2011/92/EU and the Espoo Convention are applicable, the relevant information shall be made available to the competent authority of the neighbouring Member States. The competent authority of the neighbouring Member States shall indicate, in the notification process where appropriate, whether it, or any other authority concerned, wishes to participate in the relevant public consultation procedures.
  - The project promoter, or, where national law so provides, the competent authority, 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. Commercially sensitive information shall be kept confidential.  
(SEP:SEP) Project promoters shall also publish relevant information by other appropriate information means to which the public has open access.

ANNEX VI

**GUIDELINES FOR TRANSPARENCY AND PUBLIC PARTICIPATION**

The manual of procedures referred to in Article 9(1) shall at least specify:

- the relevant law upon which decisions and opinions are based for the different types of relevant projects of common interest, including environmental law;
- the relevant decisions and opinions to be obtained;
- the names and contact details of the Competent Authority, other authorities and major stakeholders concerned;
- the work flow, outlining each stage in the process, including an indicative time frame and a concise overview of the decision-making process;
- information about the scope, structure and level of detail of documents to be submitted with the application for decisions, including a checklist;
- the stages and means for the general public to participate in the process.

The detailed schedule referred to in Article 10(4)(b) shall specify as a minimum the following:

the decisions and opinions to be obtained;  
 the authorities, stakeholders, and the public likely to be concerned;  
 the individual stages of the procedure and their duration;  
 major milestones to be accomplished and their deadlines in view of the comprehensive decision to be taken;  
 the resources planned by the authorities and possible additional resource needs.

- To increase public participation in the permit granting process and ensure in advance information and dialogue with the public, the following principles shall be applied:

The stakeholders affected by a project of common interest, including relevant national, regional and local authorities, landowners and citizens living in the vicinity of the project, the general public and their associations, organisations or groups, shall be extensively informed and consulted at an early stage, when potential concerns by the public can still be taken into account and in an open and transparent manner. Where relevant, the competent authority shall actively support the activities undertaken by the project promoter.

Competent authorities shall ensure that public consultation procedures for projects of common interest are grouped together where possible. Each public consultation shall cover all subject matters relevant to the particular stage of the procedure, and one subject matter relevant to the particular stage of the procedure shall not be addressed in more than one public consultation; however, one public consultation may take place in more than one geographical location. The subject matters addressed by a public consultation shall be clearly indicated in the notification of the public consultation.

Comments and objections shall be admissible from the beginning of the public consultation until the expiry of the deadline only.

- The concept for public participation shall at least include information about:

the stakeholders concerned and addressed;  
 the measures envisaged, including proposed general locations and dates of dedicated meetings;  
 the timeline;  
 the human resources allocated to the respective tasks.

- In the context of the public consultation to be carried out before submission of the application



file, the relevant parties shall at least:

publish an information leaflet of no more than 15 pages, 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 and of the manual of procedures referred to in point (1);

inform all stakeholders affected about the project through the website referred to in Article 9(7) and other appropriate information means;

invite in written form relevant affected stakeholders to dedicated meetings, during which concerns shall be discussed.

- The project website shall make available as a minimum the following:

the information leaflet referred to in point (5);

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;

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;

contact details in view of obtaining the full set of application documents;

contact details in view of conveying comments and objections during public consultations.

## 3.2 APPENDIX 2 – IRISH GUIDELINES

### AN BORD PLEANÁLA GUIDELINES

#### **5. Public Participation: The Regulation**

##### **5.1 Article 9 of Regulation 347/2013**

Article 9 provides that, without prejudice to any requirements under the Aarhus and Espoo Conventions and relevant EU law, all parties involved in the permit granting process shall follow the principles for public participation set out in Annex V1.3.

Those principles are listed below:

The stakeholders affected by a project of common interest, including relevant national, regional and local authorities, landowners and citizens living in the vicinity of the project, the general public and their associations, organisations or groups, shall be extensively informed and consulted at an early stage, when potential concerns by the public can still be taken into account and in an open and transparent manner. Where relevant, the Competent Authority shall actively support the activities undertaken by the project promoter.

Competent authorities shall ensure that public consultation procedures for Projects of Common Interest are grouped together where possible. Each public consultation shall cover all subject matters relevant to the particular stage of the procedure, and one subject matter relevant to the particular stage of the procedure shall not be addressed in more than one public consultation; however, one public consultation may take place in more than one geographical location. The subject matters addressed by a public consultation shall be clearly indicated in the notification of the public consultation.

Comments and objections shall be admissible from the beginning of the public consultation until the expiry of the deadline only.

An Bord Pleanála as Competent Authority for Projects of Common Interest shall operate by those principles.

## **5.2 The Pre-Application Procedure and Public Participation**

The project promoter has an indicative period of 3 months from the start of the permit granting process to submit a public participation concept to An Bord Pleanála (Competent Authority). An Bord Pleanála (Competent Authority) must either modify or approve the concept within 3 months.

The modification or approval will be done following consultation with the other relevant authorities, as considered appropriate.

To give effect to the public participation principle that the general public, stakeholders and landowners should be extensively informed, An Bord Pleanála (Competent Authority) will be requesting project promoters to inform and consult with the general public at the earliest possible time which may include the time prior to the project promoter formally notifying An Bord Pleanála (Competent Authority) about the project under Article 10(1)(a) of the Regulation. An Bord Pleanála (Competent Authority) draws the attention of project promoters to the provisions of Article 9(3) of the Regulation which provides that An Bord Pleanála (Competent Authority) shall take into consideration any form of public participation and consultation that took place before the start of the permit granting process in arriving at any decision in relation to the public participation concept.

## **5.3 Public Participation Before Submission of the Application File**

Annex VI (5) of the Regulation sets out what, at least, the relevant parties shall provide. These details are:

- publish an information leaflet of no more than 15 pages, 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 and of the manual of procedures;
- inform all stakeholders affected about the project through the website referred to in Article 9(7) of the Regulation and other appropriate information means;
- invite in written form relevant affected stakeholders to dedicated meetings, during which concerns shall be discussed.

An Bord Pleanála (Competent Authority), during the pre-application procedure stage will expect the project promoter to provide details of having complied with the foregoing.

## **5.4 The Public Participation Concept**

Article 9.3 of Regulation 347/2013 provides that a project promoter shall, within an indicative period of three months of the start of the permit granting process under Article 10(1)(a) draw up and submit a concept for public participation to An Bord Pleanála (Competent Authority). Within three months of receipt of the concept An Bord Pleanála (Competent Authority) shall request modifications or approve the concept. An Bord Pleanála (Competent Authority) will seek the opinion of other relevant authorities concerned on the concept.

Annex VI (4) of the Regulation provides details of what the concept shall at least include. These details are:



- the stakeholders concerned and addressed;
- the measures envisaged, including proposed general locations and dates of dedicated meetings;
- the timeline;
- the human resources allocated to the respective tasks.

An Bord Pleanála (Competent Authority) draws the attention of the project promoters to the requirements of the Data Protection Acts 1988 and 2003 and citizens' fundamental right to privacy in relation to any material concerning identifiable stakeholders published in a public participation concept.

Generally, An Bord Pleanála (Competent Authority) intends, where it has approved a public participation concept for a specific project, to require the project promoter to publish the approved public participation concept on the project website as a further means of enhancing transparency and public participation.

In addition, An Bord Pleanála (Competent Authority) considers that all submissions received as part of the public consultation process should be published on the project website unless the submitter has provided reasonable reasons for the consideration of An Bord Pleanála, as Competent Authority, for wishing that their submission be received in confidence. Project promoters should be aware of their responsibilities under the Data Protection Acts 1988 and 2003 in relation to personal information such as addresses and contact details.

### 5.5 The Project Website and Public Participation

Annex VI (6) of the Regulation sets out the information that projects websites shall make available as a minimum. The information is:

- the information leaflet referred to in 8.4(a) above;
- 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; promoters of PCIs are free to make additional information available on their websites. However the information leaflet and the current status summary documents must be stand-alone documents which provide a complete and not misleading view of the project and its current status;
- 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;
- contact details in view of obtaining the full set of application documents;
- contact details in view of convening comments and objections during public consultations.

An Bord Pleanála (Competent Authority) will expect that the website is maintained by the project promoter concerned and that all changes to the website content are documented so that An Bord Pleanála (Competent Authority) can trace what information was made available to the general public at specific times.

### 5.6 The Statutory Permit Granting Procedure and Public Participation

As the Competent Authority under the Collaborative Scheme, the role of An Bord Pleanála is mainly to co-ordinate the issuing of the comprehensive decision and to ensure that it is made within the period set out in the Regulation. The comprehensive decision being the decision or set of decisions not including courts or tribunals that determines whether or not a project promoter is to be granted authorisation to build the energy infrastructure to realise a project.

Public participation within the individual consent granting processes operated by other authorities in the Republic of Ireland, therefore, remains within the competence of these authorities at this statutory permit granting stage. Insofar as a project comes before An Bord Pleanála as a planning application,

An Bord Pleanála will follow its own public participation procedures.

**5.6.1 Public Participation and An Bord Pleanála**

A Guide to Public Participation in Strategic Infrastructure Development is available [here](#).

**5.6.2 Public Participation and the EPA**

Information relating to EPA statutory public participation in the licensing and permitting process may be found [here](#).

**5.6.3 Public Participation and Foreshore Applications**

The Department of Environment, Community and Local Government (DECLG) places a high priority on public participation during the assessment of foreshore applications.

Information relating to DECLG public participation in relation to foreshore applications may be found [here](#).

Source

Projects of Common Interest: Manual of Permit Granting Process Procedures  
<http://www.pleanala.ie/publications/2014/pocimanual.pdf>

**3.3 APPENDIX 3 – UK GUIDELINES**

4.23. Within 3 months of the written notification to the NCA, the developer is required to submit a “concept for public participation” according to the principles in Annex VI (4). This is to ensure that the developer carries out proper public consultation on the project. In approving a concept for public participation, the NCA may take into consideration any form of public participation and consultation that took place before the start of the consenting process, to the extent that it fulfils the requirements of Article 9 of the TEN-E Regulation. Although it enumerates principles for consultations in Annex VI(3) the TEN-E Regulation does not prescribe rigid rules.

4.24. The “concept for public consultation” must include, as a minimum, the following information:

- the stakeholders concerned and addressed;
- the measures envisaged, including proposed general locations and dates of dedicated meetings;
- the timeline;
- the human resources allocated to the respective tasks.

4.25. It may be that the overall concept would be for consultation on a specific route for a linear PCI or specific location for the site of a sub- station, but because the specific site will be subject to more detailed assessments, it is not possible to specify exact dates or locations for any dedicated meetings. In such circumstances, it may be acceptable for the concept to set out in general terms what is proposed and use an indicative timescale in which consultations would be undertaken. It should be noted however, that for PCIs that are in more than one MS, consultations on the PCI in each MS must

be held within two months of the first consultation.

4.26. The TEN-E Regulation sets out the minimum requirements for “public participation” that would meet the consultation requirements in Article 9(3) and Annex VI (3). Annex VI(5) also specifies that for the required public consultation, the relevant parties shall at least:

publish an information leaflet of no more than 15 pages, 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 and of the manual of procedures referred to in point (1);  
 inform all stakeholders affected about the project through the website referred to in Article 9(7) and other appropriate information means;  
 invite in written form relevant affected stakeholders to dedicated meetings, during which concerns shall be discussed.”

4.27. The concept for public participation should be proportionate to the nature of the infrastructure proposed, but must include at least one public consultation. Developers should consider how best to engage with the public, considering the likely stakeholders and issues that might be of concern. A “concept for public participation” could follow the pattern of a stakeholder engagement plan that developers often prepare as part of project planning for a proposal that requires an EIA<sup>4</sup>. It should include some indication of where in the project timetable any proposed information events might occur. It is not expected, however, that all concepts for public participation would be able to state the precise day, hour or location of any putative information event.

4.28. In indicating the “human resources” to be allocated to specific consultation tasks, it may not be possible to state explicitly the number of persons allocated to each part of a consultation process, nor the precise timing of potential consultation events. Further, some developers may use professional public relations consultants to manage public information and consultation on a project. However developers will be expected to indicate the type of resources expected to be committed to consultation tasks (for example a project engineer and environmental specialist to explain the project and any potential significant effects) and an indication of the timing of consultations to demonstrate that the TEN- E obligations and any UK obligations will have been met before an application is submitted.

4.29. Some UK consenting regimes set out specific requirements for consultation. For example, the Planning Act 2008 and its implementing regulations have statutory obligations to consult statutory bodies, including environmental bodies such as Natural England and local authorities before submitting an application. Prospective applicants for a DCO must prepare a “Statement of Community Consultation” (SOCC), having first consulted relevant local authorities on a draft of this and carry out consultations as set out in the SOCC. The developer is required to submit a report on all the statutory consultation and publicity they have undertaken with an application for an order granting development consent and show how the outcome of the consultation has been taken account.

4.30. There is a process for consultation on applications for a Marine Licence that takes place during the examination period and the concept for public participation would take into this into account. There are also consultation requirements in regulations implementing the environmental impact assessment (EIA) directive in the UK.

4.31. Under the Town and Country Planning Act 1990, local planning authorities are required to carry out consultations as prescribed in Article 13 of The Town and Country Planning (Development Management Procedure) (England) Order 2010. In considering a proportionate concept for public participation for PCIs that may only require TCPA planning permission, developers should ensure that the concept takes account of the statutory obligations on local authorities. It should be noted that

such consultations will take place after the formal application file has been accepted, i.e. in the 18 month examination and determination period. It is recommended that developers have discussions with the NCA and relevant local authorities on the timing of such consultations, which may also be reflected in the schedule of permit-granting process. Guidance on consultations under the TCPA is available on the Planning Portal at:

<http://planningguidance.planningportal.gov.uk/blog/guidance/consultation-and-pre-decision-matters/>

4.32. In drafting a concept for public participation, developers should include any statutory requirements for consultation and how they will comply with these requirements. Note, however, that any statutory consultations required by UK consenting regimes during the examination of an application do not over-ride or substitute for the requirement in the TEN-E Regulation to hold at least one public consultation before submission of the “draft application file” – which should be accompanied by a report on the consultation. It is recommended that developers discuss any proposed “concept for public participation” with the NCA at an early stage. This would avoid rejection of an inadequate plan later.

#### **Submission of a “draft application file”**

4.33. Article 10(4)(c) of the TEN-E Regulation requires the NCA to review the developer’s “draft application file” and request any missing information. In the UK, there is no requirement to submit draft applications for approval by consenting authorities before a formal application is made for consent of an infrastructure project. Moreover, in respect of an application for a DCO under the Planning Act 2008, there is no provision during the acceptance period under section 55 of the Act to require or allow submission of additional information once an application has been made. The application must be accepted or rejected within 28 days.

4.34. However, it is normal for developers to have informal discussions with consenting or examining authorities prior to submitting an application. In the context of the TEN-E Regulation, the developer may ask the NCA to co-ordinate these discussions and the “draft application file” could be the compendium of information compiled from such discussions on formal consent applications identified in the schedule of consents drawn up in the pre-application procedure. For DCOs, such discussions should take place with PINS within two months of the intended formal application, as set out in the developer’s implementation plan.

4.35. The NCA must consider whether any information is missing according to the details identified in the pre-application stage and, if so, request it from the applicant. Under the TEN-E Regulation, the NCA has 3 months in which to confirm whether the application is accepted for examination. To avoid unnecessary duplication of material, if consenting authorities require missing information, they should consult the NCA so that the NCA can make a co-ordinated request to the developer.

#### Source

THE TEN- E REGULATION EU347/2013 Manual of Procedures: The permitting process for Projects of Common Interest in the UK  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/311184/uk\\_manual\\_procedures\\_ten\\_e\\_regulation.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/311184/uk_manual_procedures_ten_e_regulation.pdf)



