


To: Deputy Chairperson.

From:  Diarmuid Collins, Senior Administrative Officer, PCI Unit.

Re: Greenlink Interconnector/Concept for Public Participation.

Date: 25th November, 2019.

The Project

1. The Greenlink electricity interconnector project involves linking the electricity grids in Ireland and Great Britain and will consist of two converter stations: one close to the existing substation at Great Island, County Wexford and one close to the existing substation at Pembrokeshire, Wales. It is proposed to run the electricity cables underground and under sea. In Ireland, the landfall site will be at Baginbun Beach in County Wexford. High voltage direct current (HVDC) electricity cables with a fibre optic cable for control communications purposes will run underground from the landfall site to the converter station. The offshore elements will consist of HVDC electricity cables and a fibre optic cable running under the sea between the landfall sites in Ireland and Wales.

The PCI Process

2. The Greenlink project was admitted into the PCI permit granting process on 16th July, 2019. In line with Article 9.3 of E.U. Regulation 347/2013, Greenlink Interconnector Limited (the project promoter) had to submit a concept for public participation to ABP (Competent Authority) within an indicative period of three months of the start of the permit granting process.
3. A concept for public participation is not defined in the Regulation but the information that a concept shall at least include is given in Annex VI to the Regulation.

4. The consideration of a concept by ABP (Competent Authority) does not involve any consideration or assessment of the merits or otherwise of the project. ABP (Competent Authority) is only considering how the project promoter will address public participation in the context of the Regulation.
5. In drawing up and submitting a concept for public participation, a project promoter is guided by the process outlined in the Manual of Permit Granting Process Procedures (published by An Bord Pleanála in its role as Competent Authority) and must comply with the Regulation which sets out Guidelines for Transparency and Public Participation in Annex VI.
6. Greenlink submitted a concept for public participation (Concept) on 7th October, 2019.
7. Article 9.3 of the Regulation provides that the competent authority shall request modifications or approve the Concept within 3 months i.e. by 6th January, 2020. Note that the Regulation does not confer any power to refuse to approve a Concept.

Next Part of PCI Process

8. Following the modifications or approval by An Bord Pleanála (Competent Authority), the Concept will be made available to the public on Greenlink's project website. This is in accordance with our Manual of Permit Granting Process Procedures (page 15).
9. The PCI process emphasis will then focus on the scope of material and level of detail of information to be submitted and in drawing up a detailed schedule for permit granting.

The PCI Regulation and Concept for Public Participation

10. In considering the Concept, it is important to note that Article 9.3 of the Regulation provides that the competent authority shall take into consideration any form of public participation and consultation that took place before Greenlink entered the permit granting process.
11. Article 9.3 of the Regulation provides that a concept for public participation shall be in line with the Guidelines set out in Annex VI.

12. Paragraph (3) of Annex VI gives principles to be applied to increase public participation and dialogue with the public.

Greenlink's Concept for Public Participation

13. Greenlink identified the consents it considered necessary in its the letter of 21st May, 2019. Following receipt of the Concept from Greenlink, the PCI Unit circulated the Concept to the named consenting authorities: the Commission for Regulation of Utilities, Department of Housing, Planning and Local Government and An Bord Pleanála. The DoHPLG stated it had no comment on the Concept and noted that the period for public comment on the foreshore consent aspect of the project was due to commence. No other comments were received.
14. The actual Concept document is 28 pages (counting the cover page and 2 blank pages) with includes just over 8 pages of Appendices being extracts from the PCI Regulation, ABP(CA) Manual of Permit Granting Process Procedures and UK Guidelines.
15. In the Concept (page 5), Greenlink states that it has concentrated on public consultation and the considerable consultation to be undertaken with statutory consultees will not be included. Such consultation, it states, will be captured within the documentation forming the final planning application.
16. The approach taken to consultation with stakeholders by Greenlink (page 6) is that it has assigned the following consultation levels to different stakeholders based on what it states is the expected/perceived impacts and levels of interest in the project:
- 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.

For instance, the councillors in the New Ross electoral area are regarded as Consultation Level 1 with other councillors regarded as Consultation Level 3.

17. The Concept (page 9) identifies commercial and recreational users as including: tourism interest, farmers, fishermen, anglers and walkers.
18. The Concept (page 11) outlines the various consultation tools it will deploy in the consultation processes and gives detail on pages 12 to 14 of how these tools will be used in the project.
19. Greenlink gives details of consultation to date on pages 14 and 15. Greenlink gives further details and dates on its website of previous public consultation in Ramsgrange, Duncannon and Fethard-on-Sea in County Wexford.
20. No timeline for consultation is given in the Concept. A timeline is given in the information leaflet but this timetable is not a consultation timeline, it is a timetable of the project.
21. The information leaflet referred to in Annex VI of the Regulation is available on its website and it appears that 3 issues have been made available in Ireland and Wales. The June 2019 issue counting the back-cover page is 16 pages long. It should be modified to meet the Regulation requirement of being no more than 15 pages.
22. Overall, I am of the opinion that the Concept is somewhat generic, limited in actual detail and fails to adequately address certain requirements of the Regulation. For instance, while it has identified the types of commercial/recreational users in the project area, it has not demonstrated that it has actually identified by name or location the relevant affected stakeholders or how those stakeholders will actually be consulted. The Regulation Guidelines refer to the public being "extensively informed and consulted at an early stage" and I do not consider that this level of consultation is demonstrated by the Concept. While it is not open to ABP (CA) to refuse to approve the Concept, I consider it should be modified.
23. The Guidelines in Annex VI list the information the Concept shall at least include. I list these requirements with comments:

Annex VI
Guidelines for Transparency and Public Participation

Concept for Public Participation Information Inclusions

Required Item	Concept: reference pages	Comment
The stakeholders concerned and addressed;	9	Done in a generic manner by referring to farmers, fishermen etc. There is no evidence that it has identified actual stakeholder groups or that it has addresses to contact any groups as part of the consultation. I consider that the Concept should be modified in this regard.
The measures envisaged, including proposed general locations and dates of dedicated meetings;	13	It states that events will be held in public locations convenient for the local community. It has not identified locations or dates of meetings. Locations for past consultation have been given.
The timeline;		This is not given in the document.
The human resources allocated to the respective tasks.	15	It refers to having designated local and regional representatives. More detail would be desirable.

Public Consultation before submission of the Application file

Information leaflet of no more than 15 pages giving: overview and preliminary timetable of the project, national grid development plan, alternative routes considered, expected impacts (including cross-border), and possible mitigation measures.	The June 2019 issue is a 16-page information leaflet. An overview and grid details are given. The alternative landfalls are shown on a map on page 9. Page 5 states that "no adverse cross-border impacts are expected". Mitigation measures are referred to in pages 6 and 7.
List the web addresses of transparency platform and PCI	Web addresses are given on page 15.

Manual.	
Inform all stakeholders through a website and other appropriate means.	The website is set up. I consider Greenlink has met this requirement.
Invite in written form all affected stakeholders to dedicated meetings.	The reference to letters on page 13 of the Concept could be regarded as fulfilling this requirement.

Project Website

The Information Leaflet.	Is available on the website.
Non-technical and regularly updated summary of the project.	Not evident.
Indicate dates and locations for public consultations and hearings and envisaged relevant subject matters.	There is a calendar which gives details of December 2019 venues but does not state the subject matters.
Contact details for obtaining full set of application documents.	Not evident.
Contact details for comments and objections during public consultations.	Email contact availability. Phone number given for media contacts.

24. As the project is a significant project, I consider it should be made known outside of the areas where development might be located and that publication of the details in national newspapers would be a worthwhile exercise and should increase public awareness and participation.
25. In summary, my recommendation is that the Concept should be modified and the information leaflet modified to explicitly address all the items referred to in the Guidelines I attach a table of recommended modifications.

Modifications	
1.	The Concept shall be modified to include all of the requirements listed in Annex VI. Greater detail shall be provided. The relevant affected stakeholders concerned shall be identified and named while having regard to data protection issues.
2.	The events envisaged for consultation shall be detailed. The proposed general locations, townlands and, where possible, venues such as hotels or community halls shall be named. Indicative dates of dedicated meetings shall be stated.

3.	A timeline for consultation shall be given.
4.	More detailed information on the human resources allocated to the respective tasks shall be given.
5.	The information leaflet shall be modified so that it is no more than 15 pages (including the back cover).
6.	The information leaflet shall be more prominent on the project website and be placed (or a link available) on the home page of the site for ease of public access.
7.	A non-technical and regularly updated summary of the project shall be made clearly available on the project website.
8.	Indicate dates and locations for public consultations and hearings and envisaged relevant subject matters shall be made available on the project website.
9.	The project website shall be modified to more clearly display the contact details and to provide a named individual(s) that might be contacted in relation to the project/application documents.
10.	Publish brief details in two national newspapers of the PCI project (giving the project website) within 3 months.

