

21 May 2019

Mr Diarmuid Collins

PCI Unit

An Bord Pleanála

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Dear Mr Collins,

Pre-Application Notification - Project of Common Interest – Greenlink (TENTec Number 27099275)

Greenlink Interconnector Limited is the project promoter for the ‘Greenlink’ project. This project is listed as a Project of Common Interest (PCI), and as such, this letter is being submitted to An Bord Pleanála, the Competent Authority (CA) for PCIs in Ireland, as a pre-application notification to satisfy the requirements of the Regulation on guidelines for Trans-European Energy Infrastructure EU 347/2013 (the PCI Regulation). A reasonably detailed outline of the proposed project is provided herewith to enable An Bord Pleanála to acknowledge that this project is sufficiently mature to enter the permit granting process.

We note that both the Department of Housing, Planning and Local Government (Marine Environment and Foreshore), and the Commission for Regulation of Utilities have indicated that they consider that the project is mature enough to enter the PCI process. On the basis of our ongoing pre-application consultation with the Strategic Infrastructure Unit of An Bord Pleanála, we consider that they now have sufficient information on the project to provide their opinion on project maturity within a significantly shorter timescale than the three months allowed for this process. We therefore request that this determination be provided as soon as possible.

1.0 Principal Developer for the Project

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.

Greenlink Interconnector Limited is bringing private capital to the project and will assume the majority of the project risks.

Greenlink is a proposed 500MW electricity interconnector linking the existing electricity grids in Ireland and Great Britain. 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 subsea (offshore). Please refer to the attached EIA Scoping Report accompanying this letter for an overview of the project.

The location of the proposed development in Ireland is shown in Figure 2.1 of the Scoping Report; and the wider project components, including the offshore cable and the onshore elements in Wales are described in Section 2.2 of the Report.

The onshore project elements in Ireland will consist of a landfall site at Baginbun Beach, the converter station close to the existing Great Island substation and high voltage direct current (HVDC) electricity cables with a fibre optic cable for control and communication purposes running underground to this converter station. Alternating current (AC) cables will connect the converter station to the substation. This PCI pre-application notification to An Bord Pleanála relates to the project elements in Ireland. The Competent Authority in Wales, the Welsh Government, wrote to Greenlink on the 26th of October 2018 to confirm that the information provided is sufficient to enable them to acknowledge the notification and therefore the project can enter the permit granting process.

A description of the main elements of the project: in Ireland is set out in Section 2.1 of the Scoping Report; in Wales and offshore is set out at Section 2.2 of the Report.

The approach to assessing potential impacts on nature conservation sites, including Special Areas of Conservation and Special Protection Areas are described in Section 4.12 of the Report.

3.0 Consents Required

Details on the consents deemed necessary for consideration for this project are included as Schedule 1 to this letter. This information has been provided to assist An Bord Pleanála finalise the Permit Granting Schedule.

Projects of Common Interest

The European Union identified 248 energy infrastructure projects in the first PCI list. These PCI projects encompassed a range of network development, smart grids, energy storage and interconnector projects involving two or more EU Member-states. To ensure effective and efficient implementation of the projects, the European Commission is focusing on improving regional cooperation between Member States as part of the implementation of the PCI Regulation. Greenlink has been designated as a European Union Project of Common Interest (PCI project number 1.9.1) under these regulations.

Primary Consents

The project will be an interconnector project, for which consent will be required as Strategic Infrastructure under Section 182B of the Planning and Development Act 2000, as amended.

In addition, Authorisation to Construct an interconnector under Section 16 of the Electricity Regulation Act 1999, Consent to Lay Electricity Lines Across Lands under Section 49 of the Electricity Regulation Act 1999, Consent to Lay Electricity Lines Under the Public Road under Section 48 of the Electricity Regulation Act 1999, and (if required) a Special Order for the Compulsory Acquisition of Lands for the Converter Station site under Section 45 of the Electricity (Supply) Act 1927, as amended by Section 47 of the Electricity Regulation Act 1999, will required to be issued by the Commission for the Regulation of Utilities.

For the offshore elements of the project, a Foreshore Licence under Section 3(1) of the Foreshore Act 1933, as amended will be required to be issued by the Department of Housing, Planning and Local Government (Foreshore Unit).

Environmental Impact Assessment (EIA)

Greenlink is not EIA development within Ireland and the component parts of Greenlink (such as the converter station and underground cables) are not EIA development, for the purposes of the Directive 2011/92/EU as amended by 2014/52/EU (the EIA Directive).

In spite of the position under the EIA Directive and EIA Regulations, Greenlink Interconnector Limited has decided to submit an EIAR on the basis that the Irish Courts' interpretation of the EIA Directive is evolving and may go beyond Greenlink Interconnector Limited's interpretation of the EIA Directive. Greenlink Interconnector Limited is keen to ensure that Greenlink is not exposed to any challenge risk in either Ireland or Wales, and that actions taken in Wales do not undermine the Irish consenting process.

When assessing a Foreshore Licence application, the Foreshore Unit requires that the applicant has met all legal requirements under European Union Directives.

Ecological Consents

A screening report for Appropriate Assessment (AA), and if necessary, a Natura Impact Statement (NIS) will be prepared.

Other Consents Required

The elements of Greenlink in Wales and from the median line to the Welsh coast will also require consents from the relevant authorities. Refer to the Implementation Plan in Schedule 2 for details of the consents required for the full project.

4.0 Consultation

An extensive consultation process is being undertaken by Greenlink and the environmental assessment team. Organisations consulted to date include:

- An Bord Pleanála;
- Foreshore Unit, Department of Housing, Planning and Local Government;
- Wexford County Council;
- The Development Applications Unit, Department of Culture, Heritage and the Gaeltacht;
- The National Parks and Wildlife Service;
- The National Monuments Service;
- The Commission for the Regulation of Utilities.

A first round of public consultation was undertaken in Ireland in June and August 2018, and a second round was undertaken in January and March 2019.

As part of the PCI process, Greenlink is preparing a Concept for Public Participation (CPP) that will set out its proposed strategy for public participation in the project consent process. This will be a comprehensive document and will detail how the public will be consulted appropriately throughout the project.

Greenlink has set up a project specific website which provides regular updates with respect to the project (<http://www.greenlink.ie>).

A marine scoping report has been prepared, and this has been sent to all relevant statutory and non-statutory consultees.

The attached onshore EIA scoping report has also been prepared and issued to all relevant statutory and non-statutory consultees.

5.0 Ongoing and Completed Project Activities

Baseline environmental and engineering surveys are ongoing in relation to the converter station sites, the onshore routing, landfall, and the offshore routing.

In addition to the consultations outlined above, work that has been completed to date includes:

- Archaeological desktop reviews and field surveys;
- Ecology surveys;
- Engineering site walk-overs;
- Landowner engagement;
- Marine licence applications for survey work;
- Geotechnical reviews of converter station sites;
- Geotechnical reviews of landfall sites;
- Geotechnical investigation;
- Supply chain engagement with contractors and manufacturers;
- Desk-based assessment of unexploded ordnance (UXO); and
- Desk based assessment of fisheries activity.

6.0 Implementation Plan

Please refer to Schedule 2 to this letter, which presents key milestones for the proposed project, including the target date for the project to commence operation. This schedule constitutes the implementation plan for the purposes of Regulation 5(1) of the PCI Regulation.

7.0 Contact Details

Greenlink Interconnector Ltd., trading as Greenlink, is the principal developer for this project. The primary contact details for Greenlink are as follows:

Simon Ludlam
Project Director
Greenlink Interconnector Limited
South Bank House
Barrow Street
Grand Canal Dock
Dublin 4
Ireland

Email: simon.ludlam@greenlink.ie

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The Welsh Government is the CA for the project elements in Wales and has allowed it to enter into the PCI process. The contact details for the appropriate individuals in the Welsh Government relating to the Greenlink PCI in Wales are as follows:

Ms Heledd Cressey, and
Mr Prys Davies
Division for Decarbonisation of Energy Department
for Energy, Planning and Rural Affairs Welsh
Government
Cathays Park
Cardiff
CF10 3NQ

Please accept this letter and associated attachments as written notification of the proposed project as a PCI and as a pre-application notification to allow the project to enter the permit granting process. The contents of this letter are deemed to represent a 'reasonably detailed outline' of the proposed project, and we request that you determine that this is the case as soon as possible.

Yours sincerely,



Simon Ludlam (Project Director)
Greenlink Interconnector Ltd.

Attachments:

EIA Scoping Report (Ireland Onshore)
Schedule 1: Consents Required
Schedule 2: Implementation Plan