Celtic Interconnector

Volume 2A
Planning Report

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1 Introduction

Report Context

This report has been prepared to accompany an application for Statutory Approval made by EirGrid plc (hereinafter referred to as EirGrid) to An Bord Pleanála (ABP), in respect of that portion of the overall planned Celtic Interconnector project located onshore in Ireland (hereinafter referred to as the proposed development). The term "onshore" is used to refer to the area above the High Water Mark (HWM) – see also Section 6.7 of this report.

The proposed development has been designated by ABP as Strategic Infrastructure Development (SID) following pre-application consultation between EirGrid and the SID Division of ABP undertaken in accordance with the provisions of Section 182E of the Planning and Development Act 2000, as amended – ABP Ref. PL.04 302725. The written correspondence from ABP confirming the proposed development to be SID is enclosed as **Appendix A** of this Report.

As outlined in more detail in Section 2.1 below, the overall planned Celtic Interconnector project is a joint initiative between EirGrid – the Irish electricity Transmission System Operator (TSO) - and Réseau de Transport d'Électricité (RTE) the French TSO. The overall project extends between County Cork in Ireland and Brittany in North-Western France.

Separate consent applications are also being made to the relevant Competent Authorities for the remainder of the overall planned interconnector project – Ireland Offshore, UK Offshore and France Offshore and Onshore.

The overall Celtic Interconnector project has been designated a Project of Common Interest (PCI – see Section 3 of this report and elsewhere). An Application File in respect of those elements of the overall Celtic Interconnector project in Ireland is therefore concurrently being submitted to the PCI Unit of ABP.

Given its multi-consent nature, in accordance with Article 10(4)(a) of *Regulation (EU) No. 347/2013 of the European Parliament and of the Council of 17 April 2013 on guidelines for trans-European energy infrastructure and repealing Decision No. 1364/2006/EC and amending Regulations (EC) No 713/2009, (EC) No 714/2009 and (EC) No 715/2009* (hereafter 'the TEN-E Regulation'), the scope of the overall PCI Application File in Ireland has been identified by the ABP PCI Unit – in close cooperation with the other authorities concerned, and on the basis of a proposal by EirGrid plc as project promoter - as a multi-volume format, as summarised in Table 1.1. The PCI file itself contains the entire contents of Table 1.1 in addition to a Volume 0: PCI Process Overview Report.

Table 1.1: Structure of PCI Application Documentation

Consents	Volumes	No.	Contents
1. Strategic Infrastructure Development (SID) Application:	**Volume 1**	1A	Statutory Particulars
		1B	Planning Drawings
	Volume 2	2A	Planning Report
		2B	Public and Landowner Consultation Report
	Volume 3	3A	Non-Technical Summary (NTS) for Ireland Onshore**
		3C	Environmental Impact Assessment Report (EIAR) for Ireland Onshore**
	Volume 4		Environmental Report for UK Offshore*[and] **
	Volume 5		Joint Environmental Report (JER)
	Volume 6	6A	Onshore Natura Impact Statement (NIS) for Ireland (including in-combination effects) **
2. Foreshore Licence Application:	**Volume 3**	3B	NTS for Ireland Offshore*
		3D	EIAR for Ireland Offshore*
	Volume 4		Environmental Report for UK Offshore*[and] **
	Volume 5		JER
	Volume 6	6B	Offshore NIS for Ireland (including in-combination effects)*
	Volume 7	7A	Statutory Particulars
		7B	Foreshore Licence Drawings
	Volume 8	8A	Planning and Consultation Report
		8B	Marine Strategy Framework Directive Assessment
		8C	Water Framework Directive Assessment
3. CRU Consent Applications:	**Volume 9**	9A	Draft Application Form under Section 16(1)(b) of the 1999 Act for Authorisation to Construct an Interconnector
		9B	Draft Application under Section 48 of the 1999 Act for Consent to Lay Electric Cables Applications
			Draft Application under Section 49 of the 1999 Act for Consent to Lay Electric Cables Applications
Notes: * This is proposed to be submitted as part of the SID Application for information purposes. ** This is proposed to be submitted as part of the Foreshore Licence Application for information purposes.			

The structure of the SID application for the proposed development is summarised in Table 1.2. The application particulars for this SID application comprise the following:

- Statutory particulars including planning drawings **(Volumes 1A and 1B)**;
- This Planning Report **(Volume 2A)**;
- A Public and Landowner Consultation Report **(Volume 2B)**;
- An Environmental Impact Assessment Report (EIAR), including Non-Technical Summary, prepared in respect of the proposed development **(Volumes 3A and 3C)**, and for information, the EIAR, including Non-Technical Summary prepared in respect of the separate Ireland Offshore proposal **(Volumes 3B and 3D)**;

- An Environmental Report prepared for the UK Offshore proposal, also included for information purposes **(Volume 4)**;
- A Joint Environmental Report (JER) prepared by RTÉ and EirGrid in respect of the overall planned Celtic Interconnector project **(Volume 5)**;
- A Natura Impact Statement (NIS) in respect of the proposed development **(Volume 6A)**, and for information, the NIS prepared in respect of the separate Ireland Offshore proposal **(Volume 6B)**.

Table 1.2: Structure of SID Application Documentation

Consents	Volumes	No.	Contents
1. SID Application - Main Particulars:	**Volume 1**	1A	Statutory Particulars
		1B	Planning Drawings
	Volume 2	2A	Planning Report
		2B	Public and Landowner Consultation Report
	Volume 3	3A	NTS for Ireland Onshore
		3C	EIAR for Ireland Onshore
	Volume 5		JER
	Volume 6	6A	Onshore NIS (including in-combination effects)
- Reference Particulars:	**Volume 3**	3B	NTS for Ireland Offshore (for information)
		3D	EIAR for Ireland Offshore (for information)
	Volume 4		Environmental Report for UK Offshore (for information)
	Volume 6	6B	Offshore NIS (for information)

The Applicant for this SID Application for Approval

With the enactment and coming into force[1] of the *Electricity Regulation Act, 1999* ('the 1999 Act'), the liberalisation of the electricity sector commenced. This liberalisation has been driven in large part by European directives – in particular Directives 96/92/EC[2], 2003/54/EC[3] and 2009/72/EC. The 1999 Act established the Commission of Electricity Regulation (now the Commission for Regulation of Utilities (CRU)) as the independent regulator of the electricity industry in Ireland.

The liberalisation of the electricity industry has involved the separating of, or unbundling of, various functions which were once concentrated in the Electricity Supply Board (ESB). The function of Transmission System Operator (TSO) has been conveyed to EirGrid plc[4] (EirGrid), whilst the function of Distribution System Operator has been conveyed to ESB Networks Limited (ESBNL). The Transmission System Owner (or the Transmission Asset Owner / TAO) is the ESB[5].

On 29 June 2006, the CER issued a TSO Licence to EirGrid pursuant to Section 14(1)(e) of the 1999 Act, as inserted by Regulation 32 of the European Communities S.I. No. 445/2000 (Internal Market in Electricity) Regulations, 2000 ('the 2000 Regulations'). Thus, from 1 July 2006, EirGrid has assumed the role of TSO.

Regulation 8(1)(a) of S.I. No. 445/2000 provides that EirGrid, as TSO, has the exclusive function:

"To operate and ensure the maintenance of and, if necessary, develop a safe, secure, reliable, economical and efficient electricity transmission system, and to explore ***and develop opportunities for interconnection of its system with other systems****, in all cases with a view to ensuring that all reasonable demands for electricity are met and having due regard for the environment".* (Emphasis added in bold)

EirGrid operates and develops the national electricity grid power system, providing services to all users of the electricity transmission system[6]. This includes all generators, suppliers, and high voltage customers. EirGrid also owns SONI Limited (SONI), the System Operator of Northern Ireland. The Single Electricity Market Operator (SEMO) is the market operator of the all-island wholesale electricity trading system. SEMO is a joint venture between EirGrid and SONI.

[1] The *Electricity Regulation Act, 1999* came into force in February 2000.
[2] The 1999 Act and the *European (Internal Market in Electricity) Regulations*, 2000; The *European (Internal Market in Electricity) (Amendment) Regulations,* 2002; The *European (Internal Market in Electricity) (Amendment) Regulations*, 2003 were amongst the measures enacted / passed to give effect to this directive.
[3] The *European (Internal Market in Electricity) Regulations*, 2005, The *European (Internal Market in Electricity) Regulations*, 2006 and The *European (Internal Market in Electricity) (Electricity Supply Board) Regulations*, 2008 were amongst the measures enacted / passed to give effect to this directive.
[4] EirGrid is a public limited company established pursuant to Regulation 34 of the European Communities (Internal Market in Electricity) Regulations 2000 (S.I. No. 445/2000) and the licensed Transmission System Operator for Ireland pursuant to Section 14 of the Electricity Regulation Act 1999.
[5] ESB is the licensed Transmission System Owner (TAO) for Ireland pursuant to Section 14 of the Electricity Regulation Act 1999.
[6] The transmission network essentially refers to the higher voltage grid of 400 kV, 220 kV and 110 kV. The lower voltage distribution network is primarily developed as 38 kV, 20 kV or 10 kV infrastructure.

EirGrid is separately applying to the Commission for the Regulation of Utilities (CRU) under Sections 16, 48 and 49 of the Electricity Regulation Act 1999 (as amended), for Authorisation to construct the proposed interconnector and consent to exercise the powers conferred on the ESB under Section 51, Section 52(1), Section 53(1) to (5) and (9) of the Electricity (Supply) Act 1927.

It is in this capacity, and as the 'undertaker' referred to in Section 182A of the Planning and Development Act 2000, as amended, that EirGrid is proposing to develop that part of the overall planned Celtic Interconnector project located onshore in Ireland (refer to Section 2 of this report, and also Chapter 2 of Volume 3C (Part 2) for a detailed description of the proposed development). As noted in Section 1.1 above, this will form part of a suite of applications being submitted by EirGrid with its development partner RTE.

Purpose and Structure of this Report

The purpose of this planning report is to present an overview of the planning issues associated with the proposed development. It is intended to assist ABP in determining whether the proposed development is in accordance with principles of proper planning and sustainable development, and accordingly whether Statutory Approval should be granted for the proposed development.

The structure of this planning report is as follows:

- **Chapter 1: Introduction**
- **Chapter 2: The Proposed Development**
- **Chapter 3: Legislative Context for the Irish Onshore Proposal**
- **Chapter 4: Planning Policy Context**
- **Chapter 5: Social and Community**
- **Chapter 6: Planning Appraisal**
- **Chapter 7: Conclusions**
- **Appendices**

Need for the Project

The overall planned Celtic Interconnector project will create an electrical interconnection between Ireland and France to allow the exchange of electricity between the two countries.

The overall project is being developed in response to European challenges such as the energy transition and the management of climate change. Identified as a PCI by the European Union (see Section 3 of this report), the overall project meets the criteria detailed in Article 4 of the TEN-E Regulation - i.e. it contributes significantly to at least one of the following specific criteria:

- **Market integration**, *inter alia*, through lifting the isolation of at least one Member State and reducing energy infrastructure bottlenecks; competition and system flexibility;
- **Sustainability**, *inter alia*, through integration of renewable energy into the grid and the transmission of renewable generation to major consumption centres and storage sites;
- **Security of supply**, *inter alia*, through interoperability, appropriate connections and secure and reliable system operation.

The overall planned Celtic Interconnector project will:

- **Facilitate an increase in the use of renewable energy**: An interconnection between Ireland and the continent will increase the integration of renewable energy at the European level and enable France and Ireland to move forward in terms of the energy transition (in line with national policies in respect of the development of renewables);
- **Provide security of supply**: pooling resources will enable both countries to better cope with contingencies and spikes in electricity consumption. Interconnection will promote mutual assistance between both countries and will work in both directions;
- **Improve European solidarity on energy**: the overall planned Celtic Interconnector project will be a benchmark project in terms of European Solidarity on energy. It will enable Ireland to benefit directly from the European integrated electricity market. The project will be Ireland's only direct transmission link with another Member State of the European Union;
- **Promote the movement of electricity flows at a European level**: by promoting the movement of electricity in Ireland, in France and throughout all of continental Europe, the overall planned Celtic Interconnector project will enable European consumers to benefit from a more open electricity market;
- **Support the development of a more sustainable electricity mix in France and in Ireland**: The overall planned Celtic Interconnector project will contribute to European objectives of a low-carbon energy future, promoting the development of other renewable energy sources and their integration into the European electricity system.

In this context, the overall planned Celtic Interconnector project enjoys strong support from both the French and Irish governments, as well as from the European Commission. Of particular note in this regard, the completion of the overall planned project is specifically included in the current Programme for Government, as follows:-

- In respect of Mission: A Green New Deal, the Programme states: "*We will take the necessary action to deliver at least 70% renewable electricity by 2030. To achieve this, we will:…Complete the Celtic Interconnector to connect Ireland's electricity grid to France"* (p35);

- In respect of Mission: At the Heart of Europe and Global Citizenship, and in particular respect of Ireland at the Heart of Europe, the Programme states: "*We will:…Support work on the Celtic Interconnector, which will link Ireland to Europe's energy grid, increase competition in electricity prices, and help Ireland to switch to at least 70% renewable electricity"* (p111).

The overall planned Celtic Interconnector project is also specifically included in Project 2040: The National Development Plan 2018-2027. In particular respect of Strategic Outcome 8: Transition to a Low-Carbon and Climate-Resilient Society, the overall planned project is identified as a commercial state sector investment (p 78-79 and Figure 1.1 below).

Figure 1.1: Extract from Project Ireland 2040 (Source: National Development Plan 2018-2027 p79)

2 The Proposed Development

Project Overview

The overall planned Celtic Interconnector project is a subsea link that will enable the exchange of electricity between the transmission grids in Ireland and France. The link will have the capacity to carry up to 700 MW of electrical energy between the two systems.

The transmission grids in both Ireland and France are operated at High Voltage Alternating Current (HVAC). High Voltage Direct Current (HVDC) is used for the transmission of electrical power over large distances where HVAC is not technically or economically feasible. Converter stations are therefore required in both France and Ireland to convert the HVDC power to HVAC and vice versa.

The main elements of the overall Celtic Interconnector project are (see Figures 2.1 and 2.2):

- A High Voltage Direct Current (HVDC) submarine cable of approximately 500 km in length laid between the coast of Brittany in France, and the Cork coast in Ireland;
- A landfall location in Ireland and France, where the HVDC submarine circuit will come onshore and terminate at a transition joint bay;
- An underground HVDC cable in both countries between the landfall location and a converter station compound; the converter station will convert the electricity from HVDC to HVAC and vice versa;
- An underground HVAC cable in both countries between the converter station compound and the connection point to the National Grid;
- A connection to the National grid; and,
- A fibre optic link, with associated power supply, will also be laid along the entire route for operational control, communication and telemetry purposes.

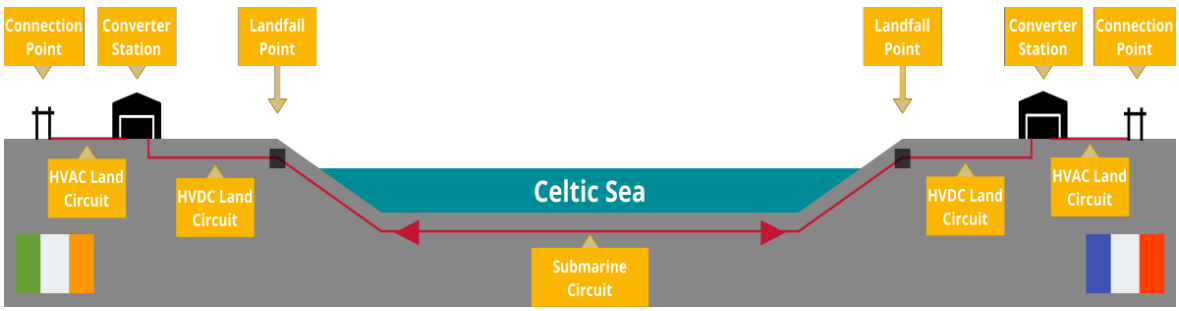


Figure 2.1: Celtic Interconnector Overview of Project Elements (Source: EirGrid)

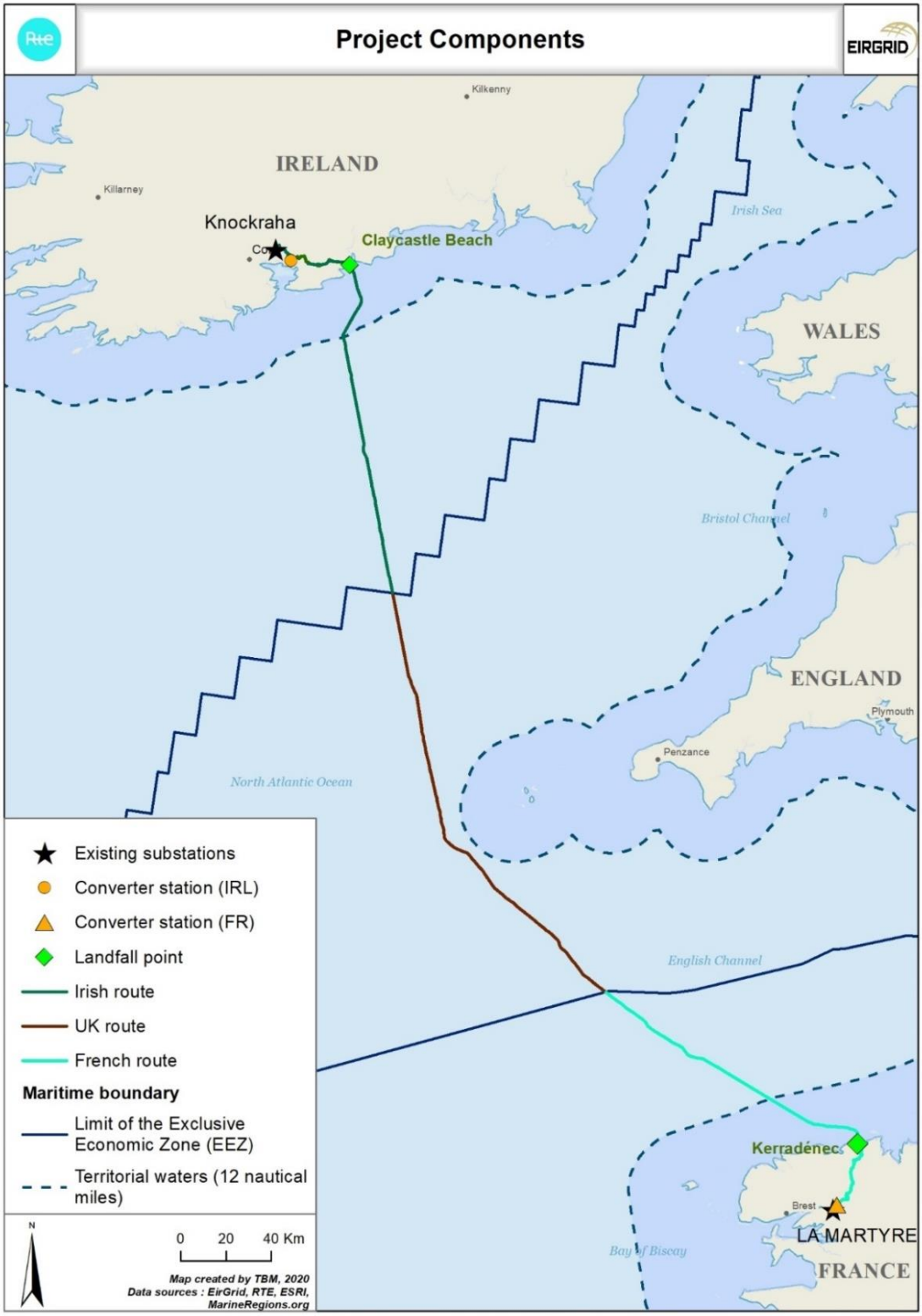


Figure 2.2: Overview of the Entire Route of the overall Celtic Interconnector project (Source: TBM Consulting Group)

In summary, the main elements of the proposed development – comprising the subject of this application for Approval by the Strategic Infrastructure Division (SID) of ABP, comprise:

- A landfall location at Claycastle Beach, Youghal, County Cork, where the HVDC submarine cable comes onshore and into a Transition Joint Bay (TJB);
- A HVDC onshore underground cable (UGC) circuit between the TJB and a converter station, located at the existing IDA landholding at Ballyadam, east of Carrigtwohill, East Cork;
- The converter station, and associated electricity infrastructure, will convert the electricity from HVDC to High Voltage Alternating Current (HVAC), which is used on the Irish transmission grid;
- A HVAC UGC circuit between the Ballyadam converter station and the connection point on the transmission grid, at the existing ESB Knockraha substation, near Watergrasshill, in County Cork; and,
- Associated electrical infrastructure and apparatus at the existing Knockraha substation to connect the interconnector to the National Grid.

A detailed description of the proposed development is set out in Chapter 2 of Volume 3C (Part 2) of the EIAR of the application submission.

Project Development

The overall planned Celtic Interconnector project has been in development for some ten years; a significant portion of this time has involved investigating, and ultimately confirming, the feasibility of the overall project.

The Irish onshore elements of the overall project have been developed in accordance with EirGrid's six-step Framework for Grid Development, as summarised in Figure 2.3. The Framework ensures that project development occurs in a consistent and structured manner, with adequate and appropriate opportunities for public and stakeholder participation in project decision-making.

Figure 2.3: EirGrid Six-Step Framework for Grid Development (Source: EirGrid)

The Framework approach, in summary, is that each "Step" concludes with outcomes (such as decisions, next steps etc.) that build upon each other. Deliverables within the Steps, such as reports, brochures etc., are available on the project website at www.eirgridgroup.com,

and are addressed in Volume 2B – a Public and Landowner Consultation Report – and Volume 3C – the EIAR for the proposed development - submitted with this application.

With particular regard to the identification of siting and routing options for the proposed development, EirGrid, together with its onshore Consultants Mott MacDonald, have undertaken Steps 3 and 4 of the Framework, with associated deliverables including:

- **Step 3:** *Onshore Constraints Report April 2019*, identifying multiple options for converter station sites and landfall locations. This report did not identify route options;

- **Step 3:** *Preferred Options Report August 2019*, identifying a shortlist of converter station sites and landfall locations. Again this report does not identify route options; however it confirms (Section 1.3 of the Step 3 report) that connections will be by way of UGC, and that (Section 3.3.2 of the Step 3 report) it is EirGrid's preference to install the UGC within existing public roads;

- **Step 4A:** *Consultant's Development Options Report November 2019*, identifying an "Emerging Best Performing Option" (EBPO) for the project in Ireland, and identifying project route options (Section 3 of the Step 4A report). While route sections had been initially identified to inform consideration of the Step 3 site/landfall options, these were considered in more detail in this report in respect of each shortlisted converter station site and landfall location. Appendix C of the Step 4A report identifies the various route sections considered. Section 3.2.3 of the Step 4A report specifically notes that various potential options had a common convergence in the area of Churchtown, such that the report considered potential HVDC routes from the Churchtown area to each Landfall Location, and HVDC routes from the Churchtown area to each Converter Station Site;

- **Step 4B:** *Consultant's Development Options Report November 2020*, identifying the "Best Performing Option" (BPO) for the proposed onshore development in Ireland, mapped at Appendix B of the Step 4B report, and reproduced at Figure 1.2 below. Of note, the Step 4B report concludes (Section 5.1) that *"this identified BPO is subject to change as studies and assessments are ongoing... however, it will form the basis for ongoing design and assessment up to presentation of a proposal for consenting…"*.

In Step 5 of the Framework process, the BPO formed the focus for technical and environmental assessment (see Figure 2.3). This culminated in a proposed development, the subject of submission of applications for Statutory consent – in Ireland consents are being sought from the Strategic Infrastructure Division (SID) of An Bord Pleanála (onshore element), and from the Foreshore Unit of the Department of Housing, Local Government and Heritage (offshore element).

The various documents listed above are contained as appendices to Chapter 1 of Volume 3C (Part 2) of this application.

Relevant Planning History

This discussion of relevant planning history is not intended to be exhaustive, but rather is intended to be relevant in terms of considering the proposed development having regard to principles of proper planning and sustainable development. This relates to interconnection, the laying of underground cables (UGC), development at the proposed converter station at the IDA Ballyadam landholding, and development at the existing Knockraha Substation.

East West Interconnector (EWIC)

The SID East West HVDC Interconnector between Ireland and Wales (ABP Ref. PL17.VA0002) was Granted Approval subject to 17 Conditions by ABP in September 2009. EWIC bears many similarities to the Celtic Interconnector in so far as it comprises:

- A HVDC submarine cable within Irish territorial waters and its Exclusive Economic Zone (EEZ);
- A landfall location in Ireland and Wales, where the HVDC submarine circuit comes onshore and terminates at a transition joint bay. In Ireland, the transition joint bay is located at North Beach, Rush, County Dublin;
- An underground onshore HVDC cable (UGC) between the landfall location and a converter station. For EWIC this UGC runs primarily along public roads, including the Main Street and built-up area of Rush in County Dublin. The HVDC route includes some off-road sections between Rush and Woodland in County Meath;
- A converter station and associated electrical infrastructure, on a site of approximately 7ha. located in proximity to the existing Woodland 400kV substation; and,
- A fibre optic link for operational control, communication and telemetry purposes.

In Granting Approval, the Board concluded that:

> *"…the proposed development would not adversely affect the integrity of a European site, seriously injure the amenities of the area or of property in the vicinity of the proposed development or be prejudicial to public health or safety, and would be acceptable in terms of traffic safety and convenience. The proposed development would, therefore, not have adverse significant effects on the environment and would be in accordance with the proper planning and sustainable development of the area".*

North-South Interconnector (NSIC)

The North-South 400kV Interconnector between Ireland and Northern Ireland is a designated PCI. In Ireland, the SID 400 kV overhead line (OHL) (ABP Ref. PL02 .VA0017) was Granted Approval in Ireland, subject to 9 Conditions, by ABP in December 2016.

In granting Approval, the Board concluded that *"…the proposed development would be in accordance with the proper planning and sustainable development of the area".*

In February 2017, applications for judicial review (JR) were submitted to the High Court, one of which was subsequently withdrawn by the applicant. In August 2017 the High Court upheld planning approval for the Irish element of the NSIC.

In February 2019, the Supreme Court dismissed an appeal and unanimously upheld the decision to grant planning consent. This brought the legal challenges to ABPs planning consent to a conclusion in Ireland.

Kilpaddoge to Knockanure 220kV Underground Cable Project, County Kerry

The Kilpaddoge to Knockanure 220kV UGC project concerns an approximately 21km long HVAC circuit between two existing 220kV substations in County Kerry. Insofar as this project concerns the civil construction of long lengths of high voltage UGC, primarily along the public road, it bears many similarities to the proposed development – see Chapter 3 of the Ireland Onshore EIAR for more detail on the construction of a UGC.

More specifically, the UGC element of the project involves:

- The laying of underground cables in trench of approximately 1.2m in depth and approximately 1.2m in width, primarily along the public road. This includes the built up area of Moyvane Village, Co. Kerry; and,
- The development of numerous joint bays at intervals of approximately 600m – 800m. The joint bays measured approximately 6m by 2.5m by 2.5m in depth and these were surrounded by temporary passing bays, required to realise the joint bay works without requirement for lengthy road closures.

Having regard to the provisions contained in Class 26 and Class 16 of the Planning Regulations 2001 (as amended), Kerry County Council made a Statutory Declaration of Exempted Development in June 2015 in accordance with Section 5 of the Planning and Development Act 2000, as amended - (Kerry County Council Reg. Ref. EX371).

The project is now in a mature stage of construction. All ducts and joint bays are now laid in the public road and the road has been reinstated (Figures 2.4 and 2.5). Passing bays have been created and are either in operation where jointing of cable lengths in the public road is now ongoing, or are in place for when such jointing occurs.

Traffic management in the form of sensor-controlled traffic lights are in place at joint bay locations (Figures 2.6 and 2.7).

Otherwise, there is effectively no above ground visibility of the UGC project.

It is the case that this will comprise the same scenario for the construction of the UGC elements of the proposed development, such that there will arise a modest and temporary local impact arising from the proposed UGC development.

Figure 2.4: Kilpaddoge-Knockanure 220 kV UGC project: Reinstated public road at a joint bay location (darker tarmac on road), with associated fibre optic link box (brown metal surface), and passing bay currently dormant and bermed with stone prior to jointing works at the joint bay

Figure 2.5: Kilpaddoge-Knockanure 220 kV UGC project: Reinstated local public road following the laying of UGC.

Figure 2.6: Kilpaddoge-Knockanure 220 kV UGC project: Sensor controlled traffic management at operational joint bay and passing bay location

Figure 2.7: Kilpaddoge-Knockanure 220 kV UGC project: Operational joint bay location comprising temporary welfare facilities, generator (blue cabinet), and jointing bay (white container over). A passing bay allows traffic flow around the joint bay – note natural revegetation of the edge of the passing bay

Amgen Technology Ireland Ltd. (IDA Ballyadam Landholding)

In July 2007, ABP Granted Permission, subject to 23 Conditions, to Amgen Technology Ireland Ltd. for a major pharmaceutical development on the overall approximately 56ha IDA Ballyadam landholding (ABP Ref. PL04.222364).

In summary, key elements of the development included:

- A 6 level multi-storey car park with 1,152 car park spaces;
- A 3-storey bulk manufacturing building and a 2-storey bulk warehouse;
- A 2-storey utilities building, with a single boiler exhaust stack 35m high;
- A utilities yard including a softened water storage / processing area, a fuel storage area, a chemical storage area, a gas storage area, and 12 cooling towers;
- A wastewater treatment plant including a 2-storey wastewater treatment building, tank farm area, and an effluent storage tank;
- Internal access roads, a truck parking area for 20 trucks, and gravelled areas for future buildings; and,
- The development also consisted of amendments to previously permitted site development works under Planning Ref. 06/8898. These included an increase of up to 400mm to the finished ground level of the development area of the site, and amendments to the layout of internal site roads, associated services and landscaping, and to a permitted attenuation / retention pond in the south-west corner of the site.

In granting permission for the site, the Board concluded that:

> *"…Subject to compliance with the conditions set out below, the proposed development would not seriously injure the amenities of the area or of property in the vicinity, would not be prejudicial to public health, would not give rise to an increased risk of flooding at Slatty Pond and would be acceptable in terms of traffic safety and convenience. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area".*

The Inspector's Report, which recommended that the planning authority's decision to grant permission for the development be upheld, noted, *inter alia,* that:

> *"Groundwater vulnerability beneath the site ranges from extreme, where the rock is close to the surface in the southeast portion of the site, to moderate in the western portion of the site. Groundwater levels, encountered in five boreholes in the course of groundwater sampling, suggest that the groundwater flow is from north / northeast to south / southwest...The predicted impacts from the operation of the facility are not considered to be significant, owing to the high level of secondary containment proposed in areas where potentially polluting materials would be stored, e.g. bunds, the fact that process effluent pipelines would be maintained over ground and the high degree of wastewater treatment on site" (p14).*

Following this Grant of Permission, the proposed converter station site, and other parts of the overall IDA landholding at Ballyadam, have been the subject of significant site development activities, including major site clearance and grading and other ground works, and the development of internal roads, water, wastewater, and surface water drainage works.

Permitted development to the east of the proposed converter station site also included construction of an enclosed 110kV indoor substation and boundary fence in 2007 (Planning Ref: 06/10555), to provide electricity to the Amgen Development. This site is now the subject of pre-application consultation between ESB and ABP in respect of a new 110 kV electricity substation (ABP Ref. VC04. 309585). It should be noted that the proposed ESB substation is entirely separate to, and unrelated to, the proposed interconnector development.

However, in November 2009, Amgen Technology Ireland Ltd. announced that the project was on hold indefinitely following global restructuring of its operations. Works ceased on site, which has subsequently contributed to its brownfield appearance.

Knockraha Substation

The proposed connection point is at the eastern end of the existing Knockraha 220kV station. There have been various permissions since at the substation, including:-

- installation of a waste treatment system (Planning Ref: 03/397);
- 36m high communication structures, antennae, equipment cabins and fencing (Planning Ref: 03/1528);
- installation of a 220kV / 110 kV transformer with associated bund wall and noise attenuation barriers, including 4 no. gantry structures, voltage transformers, circuit breakers, 2 no. control cabins and associated site works (Planning Ref: 08/7684).
- In October 2014, EirGrid were granted permission for an extension to the 220kV substation busbar including the installation of electrical apparatus and 6 no 24m lighting masts (Cork County Council Planning Ref. 13/6402 / An Bord Pleanála Ref. PL04.244030). This includes the area of the planned connection works to facilitate connection of the proposed development to the Irish grid.

Youghal to Midleton Greenway

The Youghal to Midleton Greenway[7] secured Part 8 consent in January 2019. The proposed development crosses the Greenway at 3 locations, namely in the townland of Dysart near Ballyvergan East (Youghal), in the townland of Moanlahan at Killeagh, and in the townland of Roxborough, north-west of Churchtown.

The Greenway, currently under construction by Cork County Council, will extend between Midleton Train Station and the disused Youghal Train Station predominantly along the

[7] Greenways are off-road routes for walkers, cyclists and other non-motorised transport which are often created in Ireland from disused Irish rail networks. In this case, the Greenway occurs on the disused Midleton-Youghal railway line.

corridor of the disused railway over a distance of approximately 23km. The route of the Greenway is provided in Figure 2.8. It is planned that the Greenway will be open for public use by the early months of 2023.

This development is also addressed in respect of Consideration of Alternatives at Chapter 1 of Volume 3C (Part 2) of the Ireland Onshore EIAR.

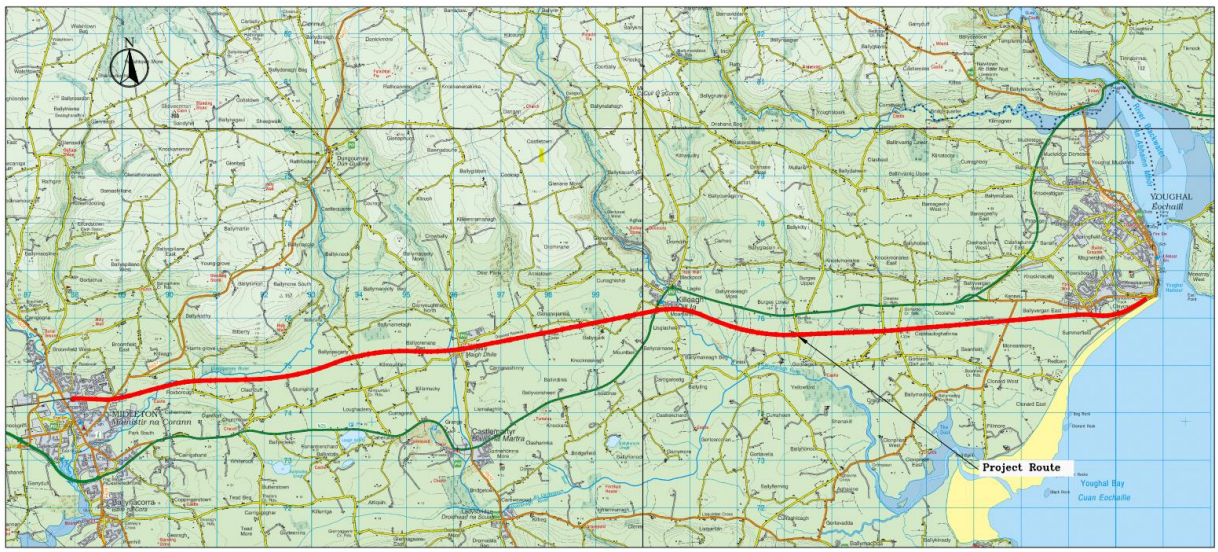


Figure 2.8: Route of Midleton to Youghal Greenway (Source: Extract from Location Map Drawing No.SC-17-075-01 https://www.corkcoco.ie/sites/default/files/2018-09/Scheme%20Drawings.pdf)

Relevant Planned Developments

The following developments are understood to be planned in the short to medium-term; however, they are currently at an optioneering or preliminary design phase. In all instances, EirGrid has engaged with the relevant developers insofar as these developments may have relevance to the proposed development.

Future Neighbouring Development at IDA's Landholding at Ballyadam

The converter station element of the proposed development is located within the north-eastern portion of IDA's overall landholding at Ballyadam. The development potential of the site is promoted in accordance with its industrial zoning under the Cobh Municipal District Local Area Plan 2017 (see Section 4 of this report).

As noted in Section 2.3.4 above, the site immediately east of the converter station site has been separately identified for development by ESB Networks as an electricity substation, unrelated to the Celtic Interconnector project. As such in the future, this portion of the overall landholding is planned to comprise a concentration of strategic electricity infrastructure, with the remainder of the landholding planned for other industrial and employment generating development.

EirGrid continues to engage with ESB Networks to ensure consistency between the proposed development and the separate planned ESB substation. At the time of making this application for Approval, it is the case that there are likely to be parallel construction timelines between the proposed EirGrid converter station, and the planned ESB substation. Such topics of engagement therefore include matters such as the location and layout of construction access routes and permanent vehicular access routes, provision of utilities and services to serve the two electricity infrastructure developments, location of separate construction compounds etc.

The cumulative environmental impact of the proposed converter station with the planned ESB electricity substation is addressed in the EIAR submitted for the proposed development.

EirGrid also continues to engage with the IDA in relation to the future development of the wider IDA landholding, particularly with regard to the provision of essential infrastructure across the landholding. In particular, this includes the planned upgrading of vehicular access to the overall landholding from the existing “Hedgy Boreen” local road which runs along the western boundary of the overall IDA landholding.

In this regard, it is the case that the proposed development has been designed to integrate into the existing road and drainage network on the site and in its immediate vicinity; however, should this existing network evolve over time to serve new occupiers on the overall IDA landholding, the specific layout of proposed infrastructure serving the proposed development might require to be modified. However, any such modification would be subject to separate consents processes as required or as appropriate. This matter cannot be confirmed at this point in time.

N25 Carrigtwohill to Midleton Infrastructure Improvement Scheme

The N25 Carrigtwohill to Midleton Infrastructure Improvement Scheme has been planned for several years by Cork County Council in conjunction with Transport Infrastructure Ireland (TII). A route protection corridor is provided for this development within the current Cork County Development Plan 2014. The project is included in Project Ireland 2040 and the National Development Plan 2018 – 2027. The purpose of the scheme is to provide an improved transport infrastructure on the N25 between Carrigtwohill and Midleton.

The existing 5km dual carriageway section of the N25 from Carrigtwohill to Midleton is of a lower standard than the rest of the N25 from Cork to Carrigtwohill. There are numerous at grade junctions, median crossing points and direct access points. The benefits of the scheme will include reduced congestion, quicker journey times, improved journey reliability and comfort and significantly higher levels of road safety on the route.

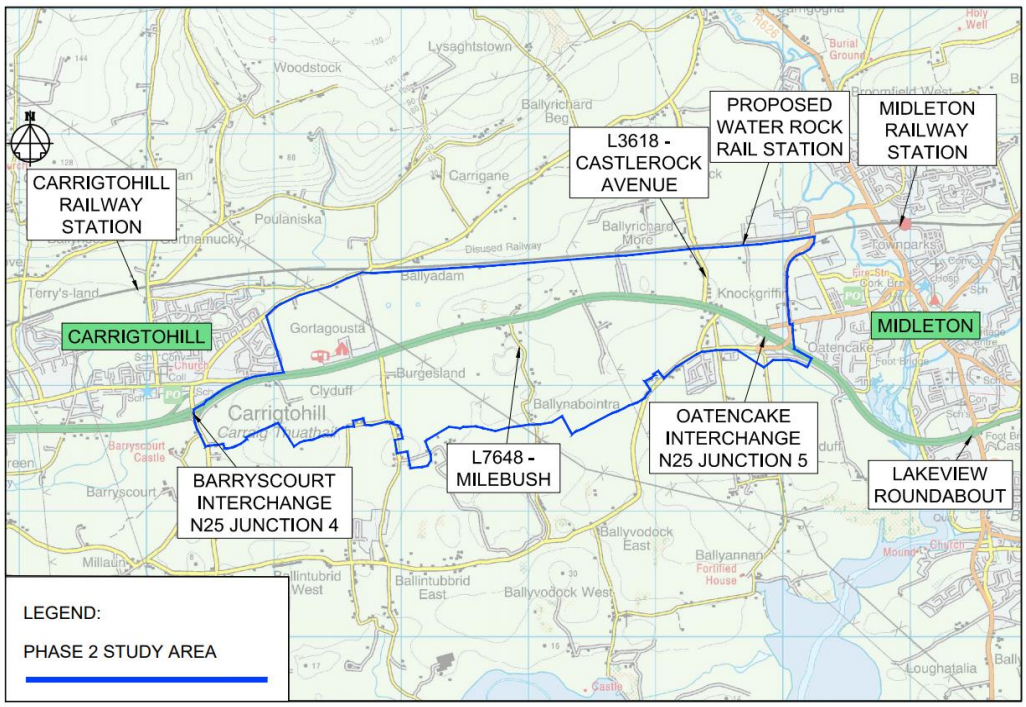


Figure 2.9: N25 Improvement Scheme – Phase 2 Study Area (Source: Public Consultation Brochure - October 2020)

The project is currently at Phase 2 - Option Selection, with four route options provided for the initial public consultation, including the provision of a full dumb-bell interchange at Ballyadam, with associated slip roads, which would require to be constructed on the southern portion of the overall landholding. The Phase 2 Study Area (Ref. Figure 2.6) overlaps with the proposed development.

The preferred route option will be selected at the completion of this phase. Detailed design will follow during Phase 3 of this road improvement project, including detailed environmental evaluation prior to lodging an application to An Bord Pleanála.

In the meantime, EirGrid is in regular engagement with the Roads Design Office (RDO) of Cork County Council to provide and receive updates on the separate interconnector and road upgrade development projects.

This planned development is also addressed in respect of Consideration of Alternatives at Chapter 1 of Volume 3C (Part 2) of the Ireland Onshore EIAR.

Water Rock Urban Expansion Area, West of Midleton

Water Rock Urban Expansion Area is identified within Cork County Development Plan 2014 as an area of targeted residential and economic growth within Midleton, which will facilitate a quantum housing capacity of approximately 2,500 residential units upon completion. There is a requirement for Irish Water to provide water and wastewater services to facilitate this planned expansion of Midleton.

At present the Midleton Wastewater Treatment Plant (WWTP) is operating at capacity and is unable to accept addition wastewater flows. In order to address the capacity issues at Midleton WWTP, it is proposed to upgrade the treatment processes at the WWTP while also reducing hydraulic loading through the transfer of foul flows to Carrigtwohill WWTP. This will require rising main sewer connection between each WWTP.

It is understood that public roads will be utilised where possible for the sewer connections, with a sewer connection running north of the Ballyadam converter station site. EirGrid continues to engage with both Irish Water and Cork County Council in relation to the proximity of these works to a portion of the HVDC UGC route.

Midleton Flood Relief Scheme

Cork County Council in conjunction with the Office of Public Works is developing the Midleton Flood Relief Scheme, which is currently at the options appraisal stage. The scheme seeks to address all four sources of flood risk - fluvial, tidal, groundwater and pluvial flooding while minimising risks to the existing community, social amenity, environment and landscape character.

The only planned element of the Flood Relief Scheme which is in close proximity to the proposed development is the potential bridge replacement proposed for Area 1: Tír Cluain to Willowbank Options. Under Option 1A: Conveyance Improvements and Direct Defences, a small road bridge which crosses the Glenathonacash stream will be replaced, north of the junction of the R626 and the L7822 to the northeast of Tír Cluain. The UGC route runs approximately 10m north of this road bridge. It is noted that construction commencement for the Flood Relief Scheme is programmed for 2023.

Conclusion

The proposed development has a number of similarities to other significant electricity projects such as EWIC and the Kilpaddoge-Knockanure 220 kV UGC project in North Kerry. Both of these projects concern underground electrical transmission infrastructure over long lengths of UGC. In addition, EWIC included provision of a converter station site.

The Kilpaddoge to Knockanure UGC – of 21km in length - was Declared to constitute exempted development The EWIC project was Granted Approval, following the conclusion of ABP that it would not seriously injure the amenities of the area or of property in the vicinity of the proposed development, nor would be prejudicial to public health or safety, nor would have adverse significant effects on the environment, and that it would be in accordance with the proper planning and sustainable development of the area.

The most significant planning history pertaining to the converter station site at Ballyadam is the permission Granted by ABP to Amgen Technology Ireland Ltd. for a significant development on the overall landholding (including the site of the proposed converter station) which included a 6 level multi-story car park, a 3-storey bulk manufacturing building and 35m high boiler exhaust stack. Thus, development of large and visually prominent buildings and structures on the landholding has previously been permitted. It is noted that the proposed converter station constitutes the only large building of the proposed development.

The proposed development has the potential to interface with other planned infrastructure developments in the future, most notably the future development of the overall IDA landholding, the N25 Carrigtwohill to Midleton Infrastructure Improvement Scheme – potentially including a major grade-separated interchange on the southern portion of the overall landholding.

Furthermore, as addressed at Section 4.5.3 of this report, Cork County Council is currently developing plans for the major expansion of the urban development area of Carrigtwohill, primarily including lands to the north-west of the IDA landholding. Overall, therefore, from a context of proper planning and sustainable development, the proposed development must be understood as occurring within an evolving major development area, notwithstanding the current general rural, or otherwise undeveloped, nature of the receiving environment including the brownfield IDA Ballyadam landholding.

In this context, the interface of the proposed development with other proposed wastewater, electricity, and housing infrastructure projects, and in particular within or using the same public road network, will ensure ongoing coordination between EirGrid, ESB, TII, Irish Water, IDA and Cork County Council. These State Authorities are already well progressed in terms of collaboration and engagement.

3 Legislative Context for the Irish Onshore Proposal

Introduction

This report has been prepared as part of the consent application for the proposed development. As such, this section relates to the Ireland onshore elements of the project.

PCI and TEN-E Regulations Context

The TEN-E Regulation lays down rules for the timely development and interoperability of energy networks in European Union Member States and the European Economic Area. A Project of Common Interest or PCI is a project that is necessary to implement the energy infrastructure priority corridors and areas set out in Annex I of the TEN-E Regulation and which is part of the Union list of projects of common interest referred to in Article 3 of the TEN-E Regulation. Such projects must have a significant impact on energy markets and market integration in at least two EU countries, boost competition on energy markets and help the EU's energy security by diversifying sources and integrating more renewables into the market to decarbonise the economy. This designation also recognises a project's national and European importance.

The overall planned Celtic Interconnector project was recognised as a PCI by the European Union in the first list of PCIs published on 13 October 2013 under Delegated Regulation 1391/2013. This list contained 248 projects, which were listed as stand-alone PCIs or clusters of PCIs because of their interdependencies or competing nature. The project is listed within Annex to Delegated Regulation 1391/2013 as Priority Corridor Northern Seas Offshore Grid ("NSOG") - *"Project No. 1.6: PCI France – Ireland interconnection between La Martyre (FR) and Great Island or Knockraha (IE)".* The technical information on PCIs accompanying the Delegated Regulation (EU) 2016/89 provides details of the project as per Table 3.1.

Table 3 Error! No text of specified style in document.**.1: Technical information on Celtic Interconnector PCI**

Definition in Delegated Act	Details on Location	Promotors	Type / Technology Employed
1.6 France — Ireland interconnection between La Martyre (FR) and Great Island or Knockraha (IE) [currently known as "Celtic Interconnector"]	*Brittany, most probably La Martyre (FR) to future 400 kV substation at Knockraha (IE)*	*EirGrid plc (IE) Réseau de Transport d'Electricité / RTE (FR)*	*A new 320 kV – 500 kV (depending on the technology, to be fixed at a later stage in detailed design studies) HVDC (VSC) subsea connection of approximately 600 km and with a capacity of around 700 MW between Ireland and France (offshore).*

Table 3.1: Technical information on Celtic Interconnector PCI (Source: https://ec.europa.eu/energy/sites/ener/files/technical_document_3rd_list_with_subheadings.pdf)

The status of the overall planned Celtic Interconnector project as a PCI was reconfirmed in each subsequent list; the latest list (fourth publication) was published in October 2019. As a PCI, the overall project also has access to financial support from the Connecting Europe Facility (CEF) – a fund to develop Europe's energy, transport and digital networks.

PCI Permit Granting Procedure

To implement the permit granting process, the Irish State has chosen the 'Collaborative' model as the mechanism for issuing of a Comprehensive Decision – as required under the TEN-E Regulation - by the Competent Authority. ABP was designated the Competent Authority (CA) for PCI in December 2013, and is responsible for facilitating and co-ordinating the permit granting process for PCIs.

Figure 3.1 sets out the permit granting process according to the PCI Manual of Procedures in Ireland dated July 2019.

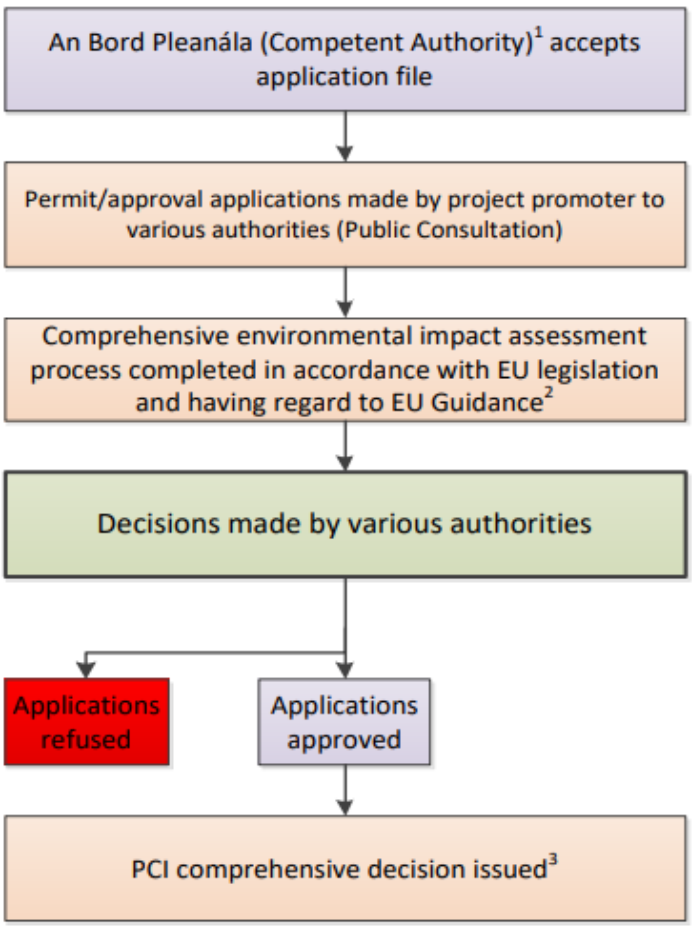


Figure 3.1: PCI Granting Process Procedural Overview. Source: PCI Manual of Permit Granting Process Procedures, An Bord Pleanála, 15 July 2019

The permit granting process as stated under Article 10 of the TEN-E Regulation consists of two procedures:

1. The pre-application procedure; and,
2. The statutory permit granting procedure.

The statutory permit granting procedure covers the period from the date of acceptance of the submitted application file until the comprehensive decision is taken. Article 10.1(b) of the Regulation provides that the period shall not exceed one year and six months. While the combined duration of the pre-application and permit granting procedures should not exceed a period of three years and six months, the TEN-E Regulation does provide that where An Bord Pleanála (PCI CA) considers that one or both of the two procedures (pre-application procedure and statutory permit granting procedure) will not be completed before the set time limits, it may decide before their expiry and on a case by case basis, to extend one or both of these time limits by a maximum of nine months for both procedures combined.

PCI Notification and Acknowledgment

The permit granting process commences on the date of signature of the acknowledgement of the notification by ABP (PCI CA). EirGrid wrote to ABP on 24 December 2018, requesting to enter the Celtic Interconnector into the Permit Granting Process of the TEN-E Regulation. In accordance with Article 10(1)(a) of the TEN-E Regulation, ABP notified EirGrid that the project was considered mature enough to enter the Permit Granting Process on 21 March 2019 – see **Appendix B** of this Report[8].

However, where two or more Member States are concerned, the start date will be the date of acknowledgement of the last notification to a Member State's National CA. In this case the Marine Management Organisation (MMO) in its role as the National Competent Authority (NCA) in the UK was the last PCI CA to give its acceptance and therefore 31 January 2020 is the start date of the permit granting process for the purposes of PCI.

Pre-Application Procedures

A number of pre-application requirements that concern this PCI Project have been completed in accordance with the requirements of the TEN-E Regulation. In summary, these comprise:

- Article 9(7): Establish and update a website linked to the Commission website. This is available at https://www.celticinterconnector.eu.

- Article 9(3): Within 3 months of Article 10(1)(a), submit Concept of Public Participation (CPP) to 3 CAs in line with Annex VI. This is available at: https://www.eirgridgroup.com/the-grid/projects/celtic-interconnector/related-documents/index.xml and appended to Volume 2B (Public and Landowner Consultation Report) of the application submission.

[8] http://www.eirgridgroup.com/site-files/library/EirGrid/Celtic-Interconnector-Project-Letter-from-Competent-Authority-to-EirGrid-Acknowledge-Project-of-Common-Interest-Notification.pdf

- Article 9(4) and 9(5): Carry out at least 1 public consultation within no more than 2 months in each Member State concerned. In addition to other public consultation undertaken by EirGrid in respect of the development of the project, this public consultation occurred in June and August 2020; in the UK this occurred in June and July 2020 and in France this occurred in July 2020 (See Volume 2B).

- Article 10(1)(a): Submit Notification Document to all 3 Competent Authorities (CAs). The pre-application notification that was sent to the Irish CA is available at: http://www.eirgridgroup.com/site-files/library/EirGrid/Celtic-Interconnector-Project-Pre-Application-Notification-from-EirGrid-to-Competent-Authority.pdf and is included as **Appendix C** of this Report.

- Article 10(4)(a): The CA shall identify, in close cooperation with other CAs, the scope of material and level of detail to be submitted. By email correspondence dated 29 March 2021, PCI Unit of ABP confirmed this requirement was completed – please refer to **Appendix D** of this Report.

- Article 10(4)(b): The CA shall draw up, in close cooperation with the project promoters and other authorities concerned, a detailed schedule for the permit granting process in line with Annex VI.(2). By email correspondence dated 22 April 2021, the PCI Unit of ABP confirmed that this requirement was completed - please refer to **Appendix E** of this Report.

- Article 10(4)(b): For projects crossing the border between two or more Member States, the CAs of the Member States concerned shall prepare a joint schedule, in which they endeavor to align their timetables. By email correspondence dated 28 April 2021, the PCI Unit of ABP confirmed that this requirement was completed and invited the submission of the Draft Application File - please refer to **Appendix F** of this Report.

- Article 10(4)(c): The requirement that the Draft Application File (DAF) shall be submitted to the relevant CAs. The Irish DAF was submitted to the PCI Unit of ABP on 29 April 2021. On 22 June 2021, the PCI Unit of ABP confirmed that no information was missing from the DAF, thereby paving the way for submission of the Application File, and consequent closure of the PCI pre-application process - please refer to **Appendix G** of this Report which contains a copy of this correspondence.

Statutory Permit Granting Phase

The Statutory Permit Granting Phase commenced once the Pre-Application Phase has been completed. It is currently anticipated that the PCI Comprehensive Decision will be issued by August 2022.

Strategic Infrastructure Development (SID) Context

Where a PCI is also a type of development specified in the Planning and Development Act 2000, as amended as Strategic Infrastructure Development (SID), the project promoter must enter into separate pre-application consultations with the Strategic Infrastructure Division of ABP to ascertain if the proposed development is deemed to be SID.

During pre-application consultation in accordance with Section 182E of the Act, EirGrid requested the view of ABP as to whether the proposed development comprises SID. As noted above, on 3 June 2021, ABP confirmed that the development was considered to fall under Section 182A of the Act – see **Appendix A.**

In keeping with the *'General Guidance Note'* at the end of the SID application form, the range and format of material required to be submitted with the application, where practicable, generally accord with the requirements for a planning application as per the Planning and Development Regulations 2001, as amended.

The preparation of the planning application drawings and other particulars has been informed by pre-application discussions held with ABP. This includes the inclusion of an Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) in respect of the proposed development, the separate (for information) EIAR and NIS in respect of the Foreshore Licence application relating to the Ireland Offshore element.

In addition, a Joint Environmental Report (JER) covering the overall planned Celtic Interconnector project is being submitted with the application for approval (see also Section 1 of this report). The European Commission (EC) *Guidance on the Application of the Environmental Impact Assessment Procedure for Large-scale Transboundary Projects* states that: *"For large-scale transboundary projects, the developer must comply with the requirements of the national EIA requirements of each country in which the project will be implemented. The developer should prepare individual national EIA reports and a joint environmental report that covers the whole project and assesses its overall effects, in particular cumulative and significant adverse transboundary effects."*

The JER, prepared in reference to the *Guidance* above, is intended to provide an assessment of the overall Celtic Interconnector project's effects. It presents the main issues and descriptions of the significant adverse effects, including cumulative effects, of the overall Celtic Interconnector project. It provides the reader with an overview of the significant effects likely to arise from one country to the other (transboundary effects), as well as those which the project is capable of generating on a global basis.

The environmental reports and assessments carried out for each country provide a detailed understanding of the territories crossed and the effects of the project. In this regard, the JER was originally prepared in November 2020 to comply with French permitting obligations. This therefore reflects a period in the evolution of the proposed development when surveys and appraisals were being undertaken. These are all now complete and form part of the content of the EIAR and NIS being submitted with the application for approval of SID. However, there is no inherent conflict between the content of the JER, and the content of either the EIAR or NIS. In addition, the JER refers to the Step 4 Best Performing Option (BPO) of the

Ireland Onshore development; this has now evolved to form the (Step 5) proposed development now the subject of this application for statutory approval.

Finally, while not specifically related to this proposed development, in the context of the JER, the Department of Environment. Climate and Communications (DECC) has confirmed that no Ministerial Consent is required for the overall planned development within the Irish Exclusive Economic Zone (EEZ) under UN Convention on the Law of the Sea.

Pre-Application Phase

Section 182E of the Planning and Development Act 2000, as amended requires that a prospective applicant shall, prior to making an application for approval for electricity transmission development, enter into consultations with ABP in relation to the proposed development. Accordingly, EirGrid lodged a pre-application request with ABP on 10 October 2018 (ABP Ref: PL04.302725). A total of seven pre-application consultations were held with ABP. A summary of the key issues discussed at each consultation are listed in Table 3.2.

Table 3.2: Pre-application Consultations undertaken with An Bord Pleanála

No.	Date	Key Matters Discussed
1	07 March 2019	The meeting focused on introducing ABP to the project. EirGrid also outlined the nature of the proposed development and highlighted any matters it wished to receive advice on from the Board.
2	29 April 2019	EirGrid provided ABP with an update on the progress of the project and discussed the grant application to the European Commission.
3	13 September 2019	EirGrid provided ABP with an update on the progress of the project, discussed the possible locations that were being considered for the converter station and the approach to the Environmental Impact Assessment Report.
4	08 September 2020	EirGrid provided ABP with an update on the progress of the project, discussed the possible location options for the converter station and discussed the scope of the SID application.
5	03 November 2020	EirGrid provided ABP with an update on the progress of the project, discussed updated ABP on the Step 4 process.
6	23 February 2021	EirGrid provided ABP with an update on the progress of the project, discussed the contents of the application files and the timelines in the Irish jurisdiction.
7	15 April 2021	EirGrid provided ABP with an update on the progress of the project, the contents of the application files and timelines in the Irish jurisdiction. The meeting focused primarily on certain procedures and process matters.

4 Planning Policy Context

Introduction

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

As noted in Section 3, this project has been identified as a Project of Common Interest (PCI) by the European Commission in 2013, with status reaffirmed in 2019.

Strategic Need for the Project – EU Law and Policy

Energy Union Package COM(2015) 80 Final

The energy union framework strategy (COM/2015/080) aims to give European Union (EU) consumers, households and businesses, secure, sustainable, competitive and affordable energy. The strategy has five mutually reinforcing and interrelated dimensions, designed to bring greater energy security, sustainability and competitiveness, as outlined below.

- **Energy security, solidarity and trust:** Diversifying Europe's sources of energy and making better, more efficient use of energy produced within the EU;
- **A fully integrated internal energy market:** Using interconnectors which enable energy to flow freely across the EU, without any technical or regulatory barriers. Only then can energy providers freely compete and provide best energy prices;
- **Energy efficiency contributing to moderation of demand**: Consuming less energy in order to reduce pollution and preserve domestic energy sources. This will reduce the EU's need for energy imports;
- **Decarbonising the economy**: Pushing for a global deal for climate change and encouraging private investment in new infrastructure and technologies
- **Research, innovation and competitiveness**: Supporting breakthroughs in low-carbon technologies by coordinating research and helping to finance projects in partnership with the private sector.

The strategy includes a specific minimum interconnection target for electricity at 10% of installed electricity production capacity of the Member States, to be achieved by 2020. However, the subsequent *State of the Energy Union* report[9], published in October 2020, looks at the energy union's contribution to EU's long-term climate goals and takes stock of the progress made on the energy union. The report states that eight EU member states, including Ireland, have failed to me the 10% interconnection target for 2020.

[9] Available at https://ec.europa.eu/energy/topics/energy-strategy/energy-union/fifth-report-state-energy-union_en

TEN-E Regulation (EU No. 347/2013) - Trans-European Networks for Energy

The Treaty on the Functioning of the European Union (TFEU) maintains the trans-European networks (TENs) in order to connect all the regions of the European Union (EU) in the areas of transport, energy and telecommunications. These networks are tools intended to contribute to the growth of the internal market and to employment, while pursuing environmental and sustainable development goals.

The Trans-European Networks for Energy (TEN-E) is a policy that is focused on linking the energy infrastructure of EU countries, identifying Projects of Common Interest (PCIs). PCIs benefit from:-

- Accelerated planning and permit granting
- A single national authority for obtaining permits
- Improved regulatory conditions
- Lower administrative costs due to streamlined environmental assessment processes
- Increased public participation via consultations
- Increased visibility to investors
- The right to apply for funding from the Connecting Europe Facility (CEF)

Interconnection is viewed as critical infrastructure by the EU. As a PCI, the overall planned Celtic Interconnector project will:

- Promote the movement of electricity flows at a European level: By promoting the movement of electricity in Ireland, in France and throughout all of continental Europe, the Celtic Interconnector will enable European consumers to benefit from a more open electricity market;
- Strengthen the security of supply between countries: The Celtic Interconnector project will strengthen the security of electricity supply between the two countries enabling them to rely on one another in case of unexpected events (technical incidents, spikes in consumption); and
- Support the development of a more sustainable electricity mix in France and in Ireland: The Celtic Interconnector will contribute to the European objectives of a low-carbon energy future, promoting the development of other renewable energy sources and their integration into the European electricity system.

On 2 October 2019, the European Commission (EC) announced the allocation of a €530.7 million grant from the CEF for the overall planned Celtic Interconnector project. As stated by the Irish Commission of Regulation of Utilities (CRU):- *"this grant reflects the project's value in terms of solidarity and security of supply, as well as its contribution to achieving the EU's energy policy objectives. The Celtic Interconnector could help to lower electricity prices, reduce greenhouse gas emissions and provide greater energy security which is of benefit to consumers and stakeholders. The CRU and the French Commission de Régulation de*

l'Énergie (CRE) welcome the grant decision and confirm their support for the project, as expressed in the joint decision of 25 April 2019."

As detailed in Ireland's *National Policy Statement on Electricity Interconnection*[10] (see Section 4.3.1 below), EU energy policy contains a core principle of increasing interconnection to complete the Internal Energy Market. The Market is to be completed by harmonised cross border trading rules and more interconnection. The overall planned Celtic Interconnector project aligns with this objective.

The project continues to be listed within the European network Ten Year Development Plan (TYNDP) portfolio projects. The TYNDP is a long-term plan on how the electricity transmission grid should evolve in Europe to implement the Energy Union strategy. It is based on extensive data collection and analysis, and is flexible enough to accommodate shifting policy landscapes, macroeconomic trends, and technological evolutions.

Compliance with EU Policy

EU energy policy contains a core principle of increasing interconnection to complete the Internal Energy Market. The Market is to be completed by harmonised cross-border trading rules and more interconnection. The overall planned Celtic Interconnector project helps to achieve the main aims of a borderless electricity market within the EU. Having been identified as a PCI since 2013, the project is a key project aimed at driving this change.

Strategic Policy Context – National Level

National Policy Statement on Electricity Interconnection (2018)

This Policy Statement, issued in July 2018, details that, although limited interconnections exist, beneficial outcomes have still resulted, particularly with ensuring that wind generation has not been curtailed. The Policy Statement seeks to ensure that Ireland seeks to continue to benefit from the strategic and economic benefits of electricity interconnection while aligning with EU energy targets on interconnection and decarbonisation.

The Policy Statement points to the energy policies which have already been embedded within the national planning policy under the National Planning Framework – Project Ireland 2040[11] (see Section 4.3.2 below). It confirms the importance of interconnectors to support the aims of the National Planning Framework, including the transition to a decarbonised economy, and reports that evidence suggests that savings of €20-€30 million could be achieved within the electricity transmission system.

The Policy Statement acknowledges the need to provide wider benefit to the public in terms of energy cost competitiveness. A diversified energy supply through electricity interconnection can serve as a key enabler of economic growth and competitiveness of Irish business.

[10] Available at https://www.gov.ie/en/publication/3e988-national-policy-statement-on-electricity-interconnection/
[11] See https://www.gov.ie/en/campaigns/09022006-project-ireland-2040/

As an island nation, Ireland has obvious energy challenges, and it is desirable to diversify electricity sources and supplies. Ireland's import dependency remains high at 69% in 2016.

The balance between the need for interconnector infrastructure and the development of electricity generation within Ireland is discussed. Such projects as the planned Celtic Interconnector project will help Ireland to achieve its EU interconnection target. It is also recognised that interconnectors can alleviate congestion on the transmission system; in this regard, it is noted that the EU's Third Energy Package requires that cross border capacity is not discriminated against in favour of national generation.

Project Ireland 2040 - Our Plan (National Planning Framework)

Project Ireland 2040 – also referred to as the National Planning Framework (hereafter referred to as the NPF), published in February 2018, is a 20-year framework designed to guide public and private investment, to create and promote opportunities for Irish citizens, and to protect and enhance Ireland's built and natural environment. The NPF sets out five strategic actions required to achieve this vision:

- Developing a new region-focused strategy for managing growth;
- Linking this to a new 10-year investment plan, the Project Ireland 2040 National Development Plan 2018-2027;
- Using state lands for certain strategic purposes;
- Supporting this with strengthened, more environmentally focused planning at local level; and
- Backing the framework up in law with an Independent Office of the Planning Regulator.

The NPF notes that the population of Ireland is projected to increase by approximately 1 million people by 2040 to a population of approximately 5.7 million. This growth will place further demand on both the built and natural environment as well as the social and economic fabric of the country. In order to strengthen and facilitate more environmentally focused planning at the local level, the NPF states that future planning and development will need to "*tackle Ireland's higher than average carbon-intensity per capita and enable a national transition to a competitive low carbon, climate resilient and environmentally sustainable economy by 2050, through harnessing our country's prodigious renewable energy potential."*

As also summarized in Section 1.4 of this report, the NPF states that Ireland's National Energy Policy is focused on three pillars: Sustainability; Security of Supply; and Competitiveness. In line with these principles, the National Strategic Outcome 8 (Transition to Sustainable Energy), notes that in creating Ireland's future energy landscape, new energy systems and transmission grids will be necessary to enable a more distributed energy generation which connects established and emerging energy sources, i.e. renewables, to the major sources of demand.

EirGrid's Generation Capacity Statement 2019-2028 states that a key driver for electricity demand in Ireland for the next number of years is the connection of new large energy users, such as data centres. This growing energy demand is recognised within the NPF as it states that improving energy sustainability be a key future growth enabler with regard to population and employment.

To facilitate this, the NPF acknowledges the need to 'Reinforce the distribution and transmission network to facilitate planned growth and distribution of a more renewables focused source of energy across the major demand centres.'

Government White Paper - Ireland's Transition to a Low Carbon Energy Future 2015-2030

The Government White Paper entitled *Ireland's Transition to a Low Carbon Energy Future 2015-2030*[12] sets out a framework to guide Ireland's energy policy development. The White Paper sets out a framework to guide policy and actions that the Irish Government intends to take in the energy sector up to 2030 and also reaching out to 2050. The framework has been developed in the context of the significant role played by European institutions in determining energy policy, markets and regulation. It also takes account of European and international climate change objectives, in particular the Renewable Energy Directive.

The Energy Vision 2050 established in the White Paper describes a '*radical transformation'* of Ireland's energy system which it is hoped will result in GHG emissions from the energy sector reducing by between 80% and 95%, compared to 1990 levels. This means that the diversification of energy supply during the national transition to a renewable energy system will need to shift away from carbon-intensive fuels such as peat and coal in favour of lower carbon fuels like natural gas.

The White Paper notes that Renewable energy will also play a central role in the transition to low carbon energy. No single renewable energy technology – existing or emerging – will alone enable Ireland to overcome the low carbon challenge. Rather, a diverse range of technologies will be required along the supply chains for electricity, heat and transport.

Onshore wind continues to be the main contributor (18.2% of total generation and 81% of RES-E in 2014). It is a proven technology and Ireland's abundant wind resource means that a wind generator in Ireland generates more electricity than similar installations in other countries. This results in a lower cost of support. Due to the variability of wind conditions, wind generation poses challenges to the operation of electricity grids. In Ireland, these challenges are being addressed by the electricity system operators under their DS3 programme.

In addition to this, of direct relevance to the proposed development, the White Paper acknowledges that an uninterrupted supply of energy is vital to the functioning of Irish

[12] Available at https://www.gov.ie/en/publication/550df-the-white-paper-irelands-transition-to-a-low-carbon-energy-future-2015-2030/

society and economy. Thus, adequate infrastructure and the diversification of energy supply which avoids over-dependency on any particular fuel, supplier, route or region is necessary.

EirGrid Strategy 2020-2025 Transform the Power System for Future Generations

EirGrid published a five-year Strategy[13] in September 2019, outlining a strategic response to the transition of electricity generation to a sustainable low-carbon future.

EirGrid has a unique role in leading the transformation of the All-Ireland electricity system as the operator and developer of the transmission grid on an all-island basis.

The primary goal of the strategy is to support the continued decarbonisation of electricity generation within Ireland in response to the climate crisis. As coal, peat and oil-burning electricity generation is phased out during the period up to 2030 the generation of renewable energy will be pivotal in the significant transformation of the All-Ireland electricity system.

The future operation of the electricity system will be required to be more dynamic and responsive; consequently, improvements to infrastructure are required to consolidate the strength and flexibility of the transmission grid to accommodate for an additional 10,000 megawatts of renewable generation to the electricity system. EirGrid aims to achieve this through using both innovative and proven technologies to ensure the reliability of the electricity system.

The primary goal of the Strategy is supplemented by supporting goals, summarised below:

- Operate, develop and enhance the all-island grid and market.
- The all-island Single Electricity Market is central to ensuring a reliable and competitively priced market for consumers. Over the period of the Strategy continued focus on the optimum operation of the Single Electricity Market to meet predicted demand growth across the island of Ireland will be strengthened.
- Planning for a system which is able to take advantage of future interconnectors from EirGrid and third parties through the preparedness of grid infrastructure, optimising existing assets and development of new infrastructure.
- New infrastructure developments will require comprehensive consultation and engagement with key stakeholders, local communities and landowners.
- Work with partners for positive change.
- A major collaborative programme with ESB networks, NIE networks and neighbouring transmission systems using interconnectors is needed for successful and productive partnerships.
- Developing strategic global partnerships which will enable the delivery of new technology to meet system challenges and the most cost-effective solutions.
- Engage for better outcomes for all.

[13] Available at https://www.eirgridgroup.com/about/strategy-2025/

- EirGrid have identified that the investment in communications to explain the changes and benefits of the transition to carbon-free electricity is a crucial initial step to ensure key stakeholders are invested in the transformation journey.
- Deepen and broaden consultation, and to respond in meaningful and persuasive ways to fears and concerns on new infrastructure.

4.1.5 EirGrid Transmission Development Plan 2019-2028

The Transmission Development Plan (TDP)[14] fulfils EirGrid's statutory obligation to deliver a plan for the development of the Irish transmission network and interconnections in line with the European Network of Transmission System Operators for Electricity. The TDP covers a total of 104 active projects which require funding over the period of the development plan and beyond to address the future needs of the Irish transmission network. The TDP introduces EirGrid's six-step process to determine whether and how the grid is developed.

The TDP outlines the:

- Drivers of network development;
- Network investment needs; and,
- Projects required to address these needs.

The main drivers for transmission network development are EU policy which seeks continual investment and maintenance of the electricity transmission network. European policy seeks market integration, with any disparity in production and demand areas addressed through the promotion of interconnection between European transmission systems and the enhancement of the network's security of supply. In line with European and national emission targets, renewable energy sources (RES) must be integrated thus the transmission network must be developed to provide for increased RES. The technical drivers for transmission network investment are based upon the changes in demand and generation, changes in the inter-regional power flows and asset conditions.

The Celtic Interconnector is listed as one of four Irish Projects of Common Interest within the TDP aimed at ensuring the security and reliability of electricity supply.

Réseau de Transport d'Electricité (RTE) French Transmission Network Development Plan 2019

While not of direct relevance to the planning policy context for the proposed development, at a whole of project level it is noted that Réseau de Transport d'Electricité (RTE), the joint Project Promoter, is statutorily responsible for producing a ten-year network development plan for France - Schéma Décennal de Développement du Réseau (SDDR). The SDDR sets out the strategic aims of decisions required to guide infrastructure development over the

[14] Available at http://www.eirgridgroup.com/TDP-2019-2028-Final-For-Publication.pdf. The latest TDP is the 2019-2028 Plan which was published in July 2020. The Draft TDP 2020-2029 is currently on public display by the Commission for Regulation of Utilities (CRU) and available at www.cru.ie

next 15 years in order to meet customer demand, carbon targets, highlighting the challenges and investment commitments and justifications.

The SDDR is based upon a comparable time frame used in the multi-annual energy programme and sets out the delivery requirements for network.

The SDDR 2019[15] acknowledges that the Europeanisation of the power system is required to allow all countries security of supply, and France's historical and current role as an electricity exporter is likely to continue.

The SDDR references the importance of telecommunications to maintain the system's balance and guarantee the reliability of the system's installations, the increase of renewables requires greater accuracy of control to manage variability of production. This rationale has been applied to the Celtic Interconnector with the inclusion of fibre optic cable as an element of the Ireland Onshore and Ireland Offshore elements of the overall project.

One of the public targets which derived from the multi-annual energy programme and the national low-carbon strategy is the doubling of interconnection capacity over the lifetime of the SDDR, increasing from 15GW to 30GW by 2035). This will help to deliver a more diverse power mix within the network that is balanced and sustainable from an economic perspective and which is mostly based on renewables and nuclear power by 2035. The achievement of this target is stated as creating interconnectors at all French borders. These interconnector projects have been prioritised and structured into a coherent industrial and economic programme. The Celtic Interconnector has been included in Batch 2 which seeks to generate a total of 5GW across four interconnector projects.

Regional Level Policy Framework

Southern Regional Assembly Regional Spatial and Economic Strategy

The Regional Spatial and Economic Strategy for the Southern Region[16] (hereafter referred to as the RSES) came into effect on 31 January 2020. The RSES sets out a 12-year strategic regional development framework for the Southern Region and includes Metropolitan Area Strategic Plans (MASPs) to guide the future development of the Region's three main cities and metropolitan areas – Cork, Limerick-Shannon and Waterford.

The primary aim of the RSES is to support and implement the NPF, and National Development Plan 2018-2027. As the regional tier of the national planning process the RSES seeks to achieve coordination, cohesive and balanced regional development.

[15] Available in English at https://assets.rte-france.com/prod/public/2020-07/Sch%C3%A9ma%20d%C3%A9cennal%20de%20d%C3%A9veloppement%20de%20r%C3%A9seau%202019%20-%20Synth%C3%A8se%20%E2%80%93%20English%20version.pdf
[16] Available at https://www.southernassembly.ie/regional-planning/regional-spatial-and-economic-strategy

The strategic vision of the RSES is as follows:

- Nurture all our places to realise their full potential
- Protect and enhance our environment
- Successfully combat climate change
- Achieve economic prosperity and improved quality of life for all our citizens
- Accommodate expanded growth and development in suitable locations
- Make the Southern Region one of Europe's most creative, innovative, greenest and liveable regions

The RSES acknowledges the region's significant energy generation infrastructure which is of national and regional importance. The Celtic Interconnector is specifically referenced in Chapter 8.2 – Strategic Energy Grid, and notes that the delivery of the project will help facilitate Ireland' transition to a low carbon energy future, and will include fibre optic cable providing the first direct telecommunications link between Ireland and continental Europe.

The Celtic Interconnector is specifically supported by Regional Policy Objective (RPO) 223 – International Energy Interconnection Infrastructure.

*"**RPO223** - It is an objective to support the sustainable development of international energy interconnection infrastructure and support the sustainable development (subject to appropriate environmental assessment and the planning process) of the Celtic Interconnector project between Ireland and France from a location in the Region".*

The transboundary nature of the overall planned Celtic Interconnector project is also supported in RPO220 – Integrated Single Electricity Market (I-SEM) as a project which will ultimately reinforce the energy grid for the region and country as a whole.

***RP0220** – It is an objective to support the Integrated Single Electricity Market (I-SEM) as a key priority for the Region and seeks the sustainable development and reinforcement of the energy grid including grid connection, transboundary networks into and through the Region and between all adjacent Regions subject to appropriate environmental assessment and planning processes.*

In relation to the Cork Metropolitan Area Strategic Plan (MASP), which includes the area of Carrigtwohill, the RSES identifies the IDA Ballyadam landholding (including the proposed site of the Irish Converter Station) as an asset for strategic employment locations with strong foreign direct investment and indigenous enterprises. Cork MASP objectives include:

- To strengthen the role of the Cork Metropolitan Area as an international location of scale, a complement to Dublin and a primary driver of economic and population growth in the Southern Region
- To promote the Cork Metropolitan Area as a cohesive metropolitan employment and property market where population and employment growth is integrated with: (i) the city centre as the primary location at the heart of the metropolitan area and region

reinforced by (ii) the continued regeneration, consolidation and infrastructure led growth of the city centre, Cork City Docklands, Tivoli and suburban areas (iii) active land management initiatives to enable future infrastructure led expansion of the city and suburbs (to be assessed by Core Strategy initiatives) and (iv) the regeneration, consolidation and infrastructure led growth of metropolitan towns and other strategic employment locations in a sustainable manner.

- Any reference to support for all plans, projects, activities and development in the MASP should be considered to refer to 'sustainable development' that shall be subject to appropriate feasibility studies, best practice site/route selection (to consider environmental constraints), environmental assessment including EcIA to support development management and where required, the completion of statutory SEA, EIA and AA processes as appropriate.

Local Level Policy Framework

Local planning policies are relevant considerations in determining the SID application, particularly in providing an understanding of the local issues and helped to define the scope of appropriate mitigation. The subsequent subsections identify relevant local policies adopted by Cork County Council in relation to energy infrastructure policies and land use zoning.

Cork County Development Plan 2014, as extended (including Variation No.1 and No.2)

The statutory development plan for the county supports the upgrade and expansion of the electricity transmission grid. This is outlined in Objective ED 6-1: *Electricity Network*, which states as follows:

- Support and facilitate the sustainable development, upgrade and expansion of the electricity transmission grid, storage and distribution network infrastructure;

- Support the sustainable development of the grid including strategic energy corridors and distribution networks in the region to international standards;

- Facilitate where practical and feasible infrastructure connections to wind farms and other renewable energy sources subject to normal proper planning considerations;

- Proposals for development which would be likely to have a significant effect on nature conservation sites and/or habitats or species of high conservation value will only be approved if it can be ascertained, by means of an Appropriate Assessment or other ecological assessment, that the integrity of these sites will not be adversely affected.

Draft Cork County Development Plan 2022-2028

The Draft Cork County Development Plan 2022-2028 continues to zone the overall IDA Ballyadam landholding for Industrial use.

In addition to a number of general references to the promotion of interconnection, the Draft Plan includes a specific supportive policy regarding the Celtic Interconnector: Policy ET 13.23 states that it is a policy to "*Support the development of the Celtic Interconnector project linking the electricity transmission networks between Ireland and France as identified as a key project under Project Ireland 2040 for security of electricity supply, enhanced competition, and direct access to the EU Internal Energy Market"*. There is also a section devoted to the Celtic Interconnector – specific extracts are set out in Table 4.1.

Table 4.1: Extract from Draft Cork County Development Plan 2022-2028 regarding the Celtic Interconnector

Celtic Interconnector

13.16.4 The Celtic Interconnector is a proposed electrical link, which if built will enable the movement of power between Ireland and France. The Interconnector is supported at Government level under Project Ireland 2040 and in the Regional Spatial & Economic Strategy for the Southern Region. The €1 billion project will connect Ireland's electricity network to France and the EU's Internal Energy Market (post Brexit) via an underwater connection. Once built, its 700 megawatts capacity will power 450,000 households, and help Ireland to switch to 70% renewable energy as set out in the Government's Climate Action Plan.

13.16.5 As part of the feasibility study, the route between the south coast of Ireland (East Cork) and the north-west coast of France have been proposed for the Celtic Interconnector. EirGrid have noted the subsea cables will make landfall at Claycastle Beach close to Youghal. While the Converter station infrastructure is proposed to be located at the IDA site at Ballyadam, near Carrigtohill. The length of the subsea cable would be approximately 500 km. The total length of the interconnector between the two countries would be approximately 575 km and expected to be completed by 2026.

13.16.6 The potential benefits of this large-scale infrastructure project include:

- Ability to import and export 700 MW (megawatts) of electricity, the equivalent of supplying power to around 450,000 homes;
- Enhanced security of supply for Irish electricity users. It will provide Ireland's only direct energy connection to an EU Member State once the United Kingdom leaves the EU.
- Apply downward pressure on the cost of electricity to consumers in Ireland;
- Help facilitate Ireland's transition to a low carbon energy future;
- Provide a direct fibre optic communications link between Ireland and France.

Local Area Plans

The proposed development occurs within the administrative boundaries of two municipal districts - East Cork and Cobh, each with respective Local Area Plans (LAPs), which are discussed herein.

East Cork Municipal District Local Area Plan 2017

The LAP took effect in August 2017. It sets out a vision of developments for the main towns and villages of the Municipal District including Midleton, Youghal, Castlemartyr and Killeagh. It also sets out a planning strategy and land use zoning for the towns and villages of the Municipal District, with the exception of Midleton and Youghal (their respective Town Development Plans remain the statutory plans until the adoption of the Cork County

Development Plan 2022-2028). For clarity, the proposed development does not fall within the boundary of Midleton or Youghal Town Development Plans.

The scope for development within the identified villages seeks to ensure that their rural character is maintained, enhanced and not compromised. As the proposed UGC route will be primarily laid within public roads outside the core area of these villages, there is no impact arising in terms of the achievement of this objective of the LAP.

Cobh Municipal District Local Area Plan 2017 (including Amendment No.1)

The LAP for Cobh Municipal District also took effect in August 2017. It sets out the detailed planning strategy and land use zoning for the towns and villages of the Municipal District. The existing Knockraha substation site and proposed Ballyadam convertor station sites are both located within the statutory boundary of the Cobh Municipal District Local Area Plan.

The proposed convertor station site is located within an overall 56-hectare IDA landholding at Ballyadam. This landholding is referenced under specific development objective CT-I-03 and categorised as "Industrial" development (see Figure 4.1 below). As stated within Section 3.6.62 of the LAP, the zoned industrial lands at Ballyadam have been identified for industrial uses since the 1996 County Development Plan. The lands are described as a continuing important asset to Carrigtwohill, and it is the intention of Cork County Council to allow for a wider range of industrial uses on the site.

A significant area of lands have been zoned within the LAP for new residential and associated uses to the north and east of Carrigtwohill. The alignment of the HVAC UGC will extend from the IDA Ballyadam landholding along local roads which form the northern and eastern boundaries of this urban expansion area. This proposed alignment has been identified and discussed with Cork County Council who are leading the planning and development of this urban expansion area. In this regard, specific objectives of the LAP relate both to the development of the urban expansion area, as well as a planned Greenway running parallel to the railway line, and road links serving the development lands:

- CT-U-02: Provision of new link roads to access development lands.
- CT-U-03: Provision of a Greenway to comprise a cycleway and pedestrian pathway.
- CT-U-08: Upgrading of Ballyadam Bridge to accommodate pedestrian and cycling facilities.

The proposed development will not affect the realisation of these local objectives, nor the development of the urban expansion area.

As shown in Figure 4.2, a route protection corridor has been mapped in the LAP in conjunction with Transport Infrastructure Ireland for the N25 Carrigtwohill to Midleton Infrastructure Improvement Scheme, which occurs to the south of the Ballyadam convertor station site. The N25 Scheme is currently at the optioneering stage.

As addressed in the Consideration of Alternatives section of the Ireland Onshore EIAR (Chapter *1 of Volume 3C), the use of this corridor to access the proposed converter station within the IDA Ballyadam landholding was considered but is not proposed, given the planned construction of that separate road improvement project.*

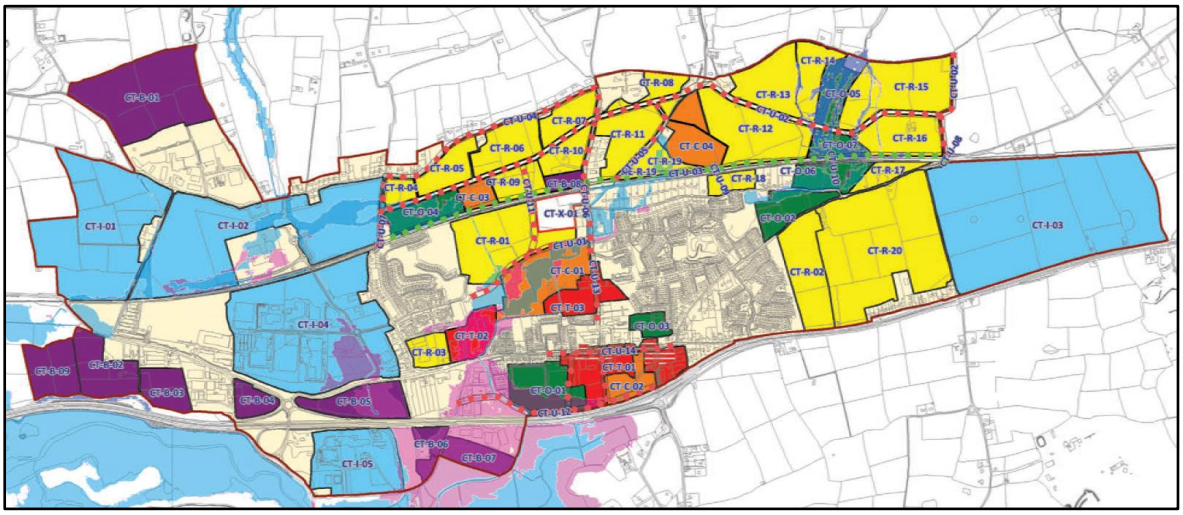


Figure 4.1: Carrigtwohill Land Use Zoning from Cobh Municipal District Local Area Plan 2017 (existing IDA landholding in blue at right centre of image)

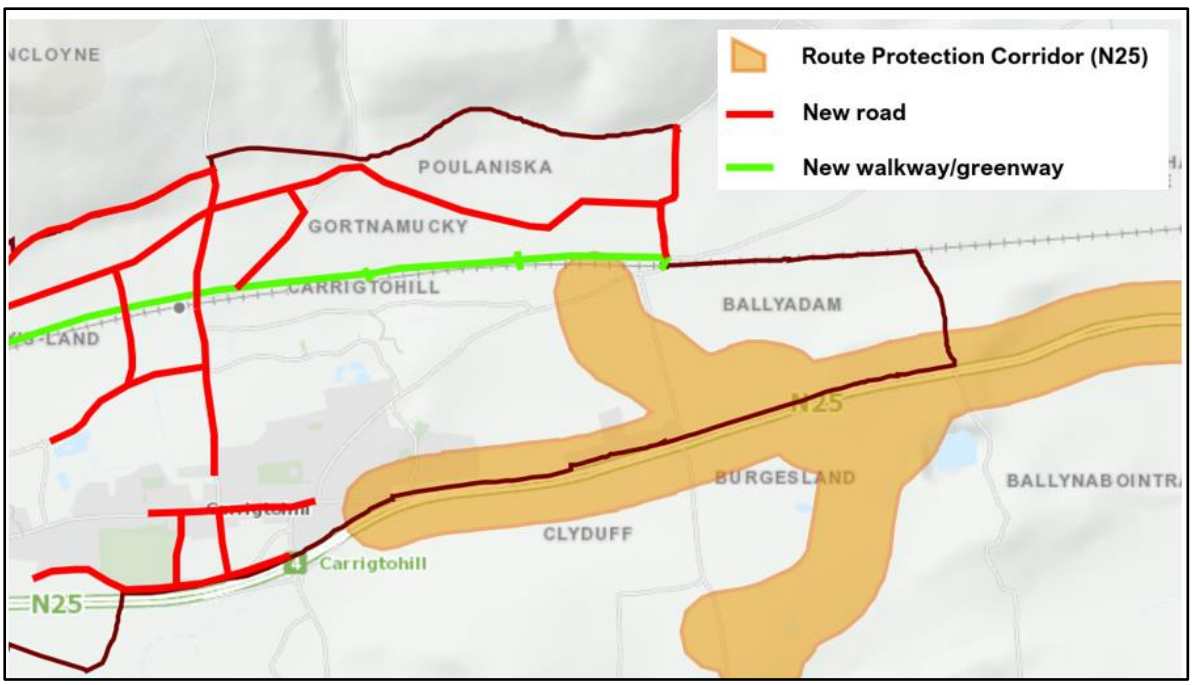


Figure 4.1: N25 Route Protection Corridor from Cobh Municipal District Local Area Plan Map Browser

Conclusion

Having regard to all of the above, It is considered that the proposed development is in accordance with, and indeed will assist in the delivery of, key strategic energy objectives and land use development policies, set out in European, National, regional, and local documents, statements, policies and plans.

5 Social and Community

Government and EirGrid Policy on Community Gain since 2012

In 2012, the then Department of Communications, Energy and Natural Resources (DCENR[17]) published a *"Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure*". The Policy Statement provided clear direction on incorporating community gain considerations into major energy infrastructure projects. In particular, the Policy Statement stated that:

"The Government would like to see enhanced co-operation with local authorities on the potential for delivering landscape, biodiversity and civic amenity benefits as part of Grid 25 and other energy infrastructure development. Delivering long lasting benefits to communities is an important way of achieving public acceptability for infrastructure… The Government therefore underlines the appropriateness for the State Companies and energy project developers to examine appropriate means of building community gain considerations into their project budgeting and planning. The Government is therefore fully supportive of a community gain approach in the delivery of energy infrastructure."

In the period following the publication of the Policy Statement, EirGrid engaged with the then DCENR, the then Commission for Energy Regulation (CER[18]), the then Department of Environment, Community and Local Government (DECLG[19]) as well as other key stakeholders focusing on the development of a suitable EirGrid community gain strategy. This strategy resulted in the establishment and implementation of a community gain policy from January 2014.

In 2019, EirGrid updated its Community Gain policy to incorporate considerations for underground cables and the phasing of community fund payments which allowed for a community fund to be activated across three phases of a project. The provisions of proximity payments were also amended.

In 2020, a further review of Community Benefit was undertaken in EirGrid to ensure alignment with its new Strategy and wider policy framework.

[17] DCENR is now the Department of Environment, Climate and Communications.(DECC)
[18] The CER is now the Commission for Regulation of Utilities (CRU)
[19] The DECLG is now the Department of Housing, Local Government and Heritage (DHLGH)

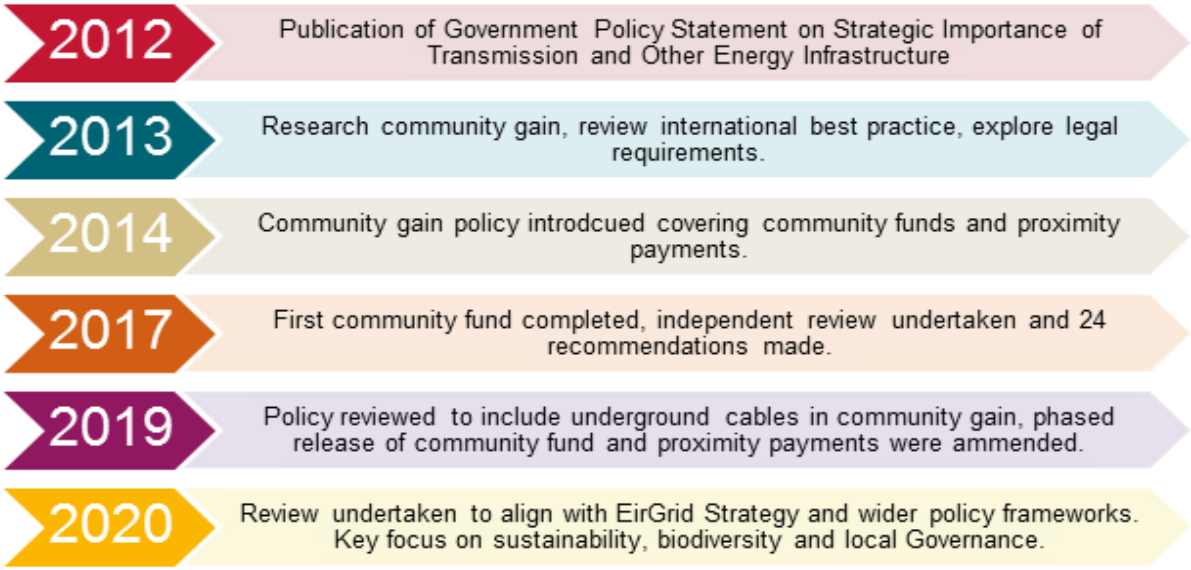


Figure 5.1: Evolution of EirGrid's Approach to Community Benefit, 2012-2020

An Enhanced Approach to Community Benefit

When EirGrid chooses routes for its linear projects, it tries to create as little disturbance as possible. However, it is acknowledged that this work has an impact on landowners and neighbouring communities, and that the provision of new infrastructure requires local support, co-operation and knowledge. That is why EirGrid will compensates landowners who are directly affected by a project – i.e. accommodating new infrastructure – as well as providing a benefit to local communities when developing new infrastructure.

For the Celtic Interconnector, this means that a community benefit fund scheme of in excess of €2 million will be established if the project goes ahead. Communities across the entire UGC route, landfall location and converter station location will benefit from this. This will ensure that the proposed development will leave a positive legacy on the communities who will facilitate its realisation.

The fund will be distributed in 3 phases – once construction begins, in the middle of construction and once the project is fully energised. EirGrid will work with a local Celtic Community Forum of stakeholders and partners to do this - this is currently being set up.

The fund will focus on 3 priority themes – Community, Sustainability and Biodiversity, in recognition of Ireland's Climate Action Plan and the communities' role in achieving this. Where previously a fund was determined for a project and delivered through a community grants process, the new fund will provide that fund value for each of the 3 priority themes.

The Celtic Interconnector Community Forum

The Celtic Interconnector Community Forum is an initiative which brings together representatives from community, social and sporting organisations in the project area, ensuring community views can be discussed, understood and properly considered prior to and during project delivery.

The frequency of meetings and items for discussion at the forum is led by the forum members which also includes local elected representatives. Irish Rural Link (IRL), a non-profit national network of organisations and individuals campaigning for sustainable rural development in Ireland and Europe has been appointed as the community forum's independent facilitator.

In addition to providing a forum for dialogue between stakeholders with interests in the project and the project team, the Community Forum will also be invited to input on the design and implementation of the Celtic Interconnector Community Benefit Fund.

6 Planning Appraisal

Introduction

This section provides the applicant's appraisal of the proposed development in the context of proper planning and sustainable development.

Need for the Proposed Development

The need for the project has been outlined in Section 1 of this report. In summary, the proposed development, and the overall planning Celtic Interconnector project, will facilitate the movement of electricity between Ireland and France by means of allowing the import and export of electricity via a subsea link. The overall planned Celtic Interconnector project is being developed in response to European challenges such as the energy transition and the role of energy in the management of climate change.

Identified as a PCI by the European Union since 2013, the overall project meets the criteria detailed in Article 4 of the TEN-E Regulation on guidelines for trans-European energy infrastructure. The Celtic Interconnector project will provide the first direct link between the electricity systems of Ireland and Continental Europe.

As a PCI (listed as Project Number 1.6 within the Priority corridor for Northern Seas Offshore Grid), the overall planned Celtic Interconnector project has had continual endorsement at EU level of its strategic importance in order to realise the programme to enhance the energy market across the continent. The proposed development thereby assists in ensuring the implementation of obligations under the various EU statements of law and policy referred to in Section 3 and 4 of this report.

Evaluation of the Proposed Development having regard to Planning Policies

The National Policy Statement on Electricity Interconnection (2018) seeks to ensure that Ireland seeks to continue to benefit from the strategic and economic benefits of electricity interconnection while aligning with EU energy targets on interconnection and decarbonisation. The Policy Statement points to the energy policies which have already been embedded within the national planning policy under the National Planning Framework.

The National Planning Framework supports the development of the electricity network to facilitate planned growth and distribution of renewable energy. The Celtic Interconnector project is specifically included in Project 2040: The National Development Plan 2018-2027 in respect of Strategic Outcome 8: Transition to a Low-Carbon and Climate-Resilient Society. It is also included within the current Programme for Government.

The RSES acknowledges the Celtic Interconnector as a significant energy generation infrastructure project of national and regional importance.

The Cork County Development Plan supports the sustainable development, upgrade and expansion of the electricity transmission grid, storage and distribution network infrastructure. Specifically, the proposed converter station – the only substantial above-ground element of the overall proposed development – will be located on lands zoned for industrial use. The proposed development is therefore supported by national, regional and local planning policy and objectives, as set out in Section 4 of this Report.

Consideration of Alternatives

The proposed development has been developed in accordance with EirGrid's six-step Framework for Grid Development. This Framework reflects EirGrid's values and approach to grid development. In accordance with the Framework, a detailed analysis of feedback has been central to the process informing the identification of the proposed development.

As set out in considerable detail in Chapter 1 of Volume 3C (Part 2) i.e. Ireland Onshore of the EIAR for the proposed development, the project development process has considered a range of alternatives. These include coastal landfall locations, converter station locations, connection point locations and cable routing alternatives. Decisions made in the context of consideration of these alternatives ultimately identified the Best Performing Option (Step 4), and subsequently the proposed development now before An Bord Pleanála (Step 5).

In particular, within Step 5, subsequent to announcement of the Best Performing Option, following engagement with the communities of Killeagh and Castlemartyr, EirGrid confirmed off-road local routing options for the HVDC cable at these villages, in preference to laying the UGC within their main street areas. In addition, in response to engagement with the community at Churchtown, west of Castlemartyr, EirGrid undertook a Review of Routing Options in the vicinity of Churchtown, including a multi-criteria comparative evaluation of those various options. This Review concluded that the on-road option in this locality comprises the Best Performing Option for the proposed development.

Overall, the design and location of the proposed development is considered by EirGrid to comprise the best balance between Technical, Environmental, Economic, Socio-Economic and Deliverability criteria, having regard to the nature, extent and strategic need for the overall planned Celtic Interconnector project.

The Do-Nothing scenario has also been considered for each technical chapter of the EIAR. Non-implementation of the proposed development would mean foregoing the benefits of interconnection with France and continental Europe, and slowing down the development of renewable energy required to combat climate change and reduced security of supply and isolating Ireland from the EU energy market.

Environmental Impact Assessment Report (EIAR)

This application for Approval includes an EIAR prepared in accordance with the requirements of EU and Irish national law, policy and practice, including Annex IV of the codified EIA Directive, and Schedule 6 of the Planning and Development Regulations 2001 as amended. Full details and a Non-Technical Summary are provided in Volume 3 of the application documentation. However, it is noted that the Environmental Impact Assessment will be undertaken by ABP as Competent Authority.

This project is to be realised via an Engineering, Procurement and Construction (EPC) contract. EPC contracts, which are sometimes called turnkey construction contracts, require the contractor to coordinate all detailed design, procurement and construction work and to ensure that the whole project is completed as required and in time.

Arising from this, the planning process facilitates EirGrid in adopting a general arrangement / project design envelope approach to securing consent for the proposed development. In so doing, all environmental assessments that have informed the proposal represent a reasonable worst-case scenario. This approach ensures that a worst-case scenario is assessed from an environmental perspective but that innovation and value engineering is possible within this parameter. It also ensures that the approach to the overall development is a precautionary one but with some allowance being possible if a lesser impact option is possible when the project is going through the detailed design phase.

In this context, EirGrid invites ABP to Grant Approval with Conditions requiring specific details of the development to be agreed with Cork County Council, as Planning Authority for the administrative area of the proposed development. This would include matters such as landscaping and planting, materials and colours, details of infrastructural layout, construction and associated management etc.

Natura Impact Statement (NIS)

This application for approval includes a Natura Impact Statement (NIS) prepared in accordance with the requirements of EU and Irish national law, policy and practice. Full details are provided in Volume 6A of the application documentation.

In summary, the mitigation measures detailed in Section 3.5 of the Onshore NIS will ensure that no adverse effects on the integrity of any European sites in light of the site's conservation objectives. Based on the assessment of the proposed development alone and in combination with other projects and plans, including the implementation of mitigation measures, it has been concluded by EirGrid that no adverse effects on the integrity of any European sites will arise, in view of the site's conservation objectives. However, it is noted that the Appropriate Assessment will be undertaken by ABP as Competent Authority.

Other Matters

Laying of Underground Cables

The laying of underground cables (UGC) is a standard construction technique undertaken by a range of utility and other services providers. This is addressed in some detail in Chapter 3 of the Ireland Onshore EIAR, comprising Volume 3C of the consent application submission.

On public roads, traffic control measures will be implemented as appropriate, including road diversions, closures and stop / go traffic management. Joint bays (underground chambers) are used to pull various lengths of UGC through pre-installed ducts and to connect ("joint") together those lengths of UGC into a single overall circuit. Off-road passing bays, constructed adjacent to a joint bay, facilitates the through movement of traffic. The road will be fully reinstated following the laying of the UGC and associated infrastructure.

Section 2 of this report, in respect of Planning History, also discusses matters of construction and reinstatement of the current EirGrid / ESB Networks UGC project between Kilpaddoge and Knockanure substations in North Kerry. The accompanying images in that Section confirm the relatively modest extent of development involved in construction, the successful routine implementation of traffic management measures in particular at joint bays, and the standard of road reinstatement. This approach and standard is entirely similar to that which will occur with the proposed development.

Both EirGrid and the appointed cable laying contractor will have dedicated land and community liaison officers to provide advance notice of works to affected communities and landowners, and to address any queries or concerns arising.

Other Construction

Chapters 2 and 3 of the EIAR Volume 3C (Part 2) describe the proposed development in some detail. In addition to the laying of UGC, there are three primary areas of construction – the landfall area at Claycastle Beach, the converter station at Ballyadam, and the connection point at the existing ESB Knockraha 220 kV substation. These will comprise construction sites for the purposes of health and safety and construction management.

Of these three sites, Claycastle Beach is the only one that currently has public access. The proposed subsea/onshore cable Transition Joint Bay (TJB) is to be located on lands to the north and north-west of the existing public car park, and thus can be appropriately fenced off. The trenching of the subsea cable up to the TJB will require temporary exclusion of public access to parts of the beach and the car park; two options for such works are proposed, with the considered worst-case option addressed in the EIAR. The extent and duration of such exclusion is dependent upon the cable laying option selected; however, this will be appropriately managed through the provision of temporary and localised pedestrian access and diversion routes above the beach, associated signage, as well as adequate and appropriate community liaison. Overall, it is considered that such necessary temporary impact is proportionate to the provision of this SID project.

Moreover in this context, while the proposed cable laying on Claycastle Beach might have a temporary impact in terms of use of a local portion of the existing beach, it is considered, on the basis of the experience of cable laying at Rush North beach associated with the East West Interconnector, that this activity could have a positive impact in terms of generating local interest, as well as interest from people involved in construction and engineering, given its relatively uncommon occurrence in Ireland. The construction, as set out in detail in Volume 3C of the application submission, involves the use of offshore cable laying vessels, and potentially large ploughs and winches, which are an unusual form of construction.

At Ballyadam, the proposed converter station site is located entirely within a larger landholding zoned for industrial development, though currently undeveloped. There is no public access into or across the site, although a number of dwellings sited on public roads in proximity to the landholding face into the site. Construction management and access will be carefully controlled on this site, in liaison with the IDA, and other future occupiers.

From a planning perspective, this element of the proposed development involves the construction of a large industrial-style building (and associated development) on the zoned industrial lands, within an area that is planned to evolve into a major industrial and employment center. In addition, major new support infrastructure is also planned within this landholding, including a separate (unrelated) ESB substation adjacent to the converter station site, a grade-separated interchange at the southern boundary of the landholding as part of a major upgrade of the N25 road corridor, and a new and/or upgraded local road network within and at the western boundary of the landholding. As such, the converter station will form one element of a planned major evolution of this overall landholding.

At the existing ESB Knockraha Substation, the connection of the proposed development onto the grid network will require new equipment and apparatus within and/or adjacent to the existing substation. From a visual and other environmental perspective, this will have the appearance and function of other long-established form and function at the substation. The planned development occurs at the eastern part of the recently extended substation, such that it is at a furthest point from Knockraha Village to the north-west of the substation, as well as the various dwellings that occur along the local road to the west of the substation. The planned new equipment will not be visible from these dwellings or from Knockraha Village. Moreover, a current separate programme of screen planting and other environmental measures at the existing substation will also mitigate any potential impact of the planned new equipment on sensitive receptors in the area.

Electromagnetic Fields (EMF)

The issue of EMF arising from the proposed electrical infrastructure is addressed in detail at Chapter 4 of the Ireland Onshore EIAR – Volume 3C.

In summary, to avoid any potential public risk in close proximity to electrical infrastructure, national and international health and regulatory authorities have recommended exposure limits for EMF. It is EirGrid's policy to design and operate the electricity transmission system

such that these limits are not exceeded. This will also be the case in respect of the proposed development.

Transboundary Impact

EirGrid is of the view that the proposed development, as part of the overall Celtic Interconnector project, will have a positive impact on the environment of the United Kingdom of Great Britain and Northern Ireland (the UK) and France by means of facilitating an increased level of renewable energy into the National fuel mix. This is substantiated by the fact that the interconnector is a PCI, by reason of the trans-European nature of this energy infrastructure and that the project crosses the border of two Member States. Such positive effects arise therefore not only in the Irish State but also in the transboundary States concerned.

For this reason, EirGrid submits that Sections 182A(4)(a)(i)(III) and 182A(4)(c) of the Planning and Development Act 2000, as amended apply, so has included reference to the development being likely to have significant effects on the environment of a transboundary State in public notices of this application for approval. More specifically on France which is a Member State of the European Union and the UK which is a party to the Transboundary Convention (the United Nations Economic Commission for Europe Convention on Environmental Impact Assessment in a Transboundary Context, done at Espoo (Finland), on 25 February 1991).

We note for the Board's information that in accordance with Section 182A(4)(c), a copy of this application for approval has been submitted to the relevant transboundary consultees in the UK and France.

The Jurisdictional Boundary of the Proposed Development

The jurisdiction of An Bord Pleanála SID in respect of the proposed development is to the Mean High Water Mark (HWM).

As per Figure 6.1 below, a HWM, based on OSI 25" series mapping (1888-1913) is shown as a yellow line that currently extends over the existing car park at Claycastle Beach, suggesting that there may have been some subsequent historic land reclamation. The pink line comprises a HWM using OSI data from 2020.

From a Legal perspective, a HWM can only be amended by a Maritime Order. No such Maritime Order(s) have been identified which amend the HWM in this area. As such, the HWM based on the OSI 25" series mapping (1888-1913) remains the Legal delineation of the jurisdictional boundary.

Notwithstanding the Board's jurisdiction for the purposes of deciding on this SID application for Approval, the extent of the red line boundary on the planning drawings extends to the 2020 HWM, given that development in this area, below the HWM is also addressed in the application particulars, including the EIAR and NIS. In particular, given the peculiar circumstances of the Legal HWM in this area, the existing Claycastle Beach car park – a

portion of which is proposed to be used temporarily as a construction compound for the proposed landfall area development – is located both above and below the HWM. The area bounded within the red line boundary at the landfall area is thus *"the land or structure to which the application relates"* as per the provisions of Article 22 (2)(b)(i) of the Planning and Development Regulations 2001 (as amended).

Separately the application for a Foreshore Licence being submitted in parallel to the Foreshore Unit of the Department of Housing Local Government and Heritage (DHLGH) extends to the HWM as denoted on the OSI 25" series mapping (yellow line).

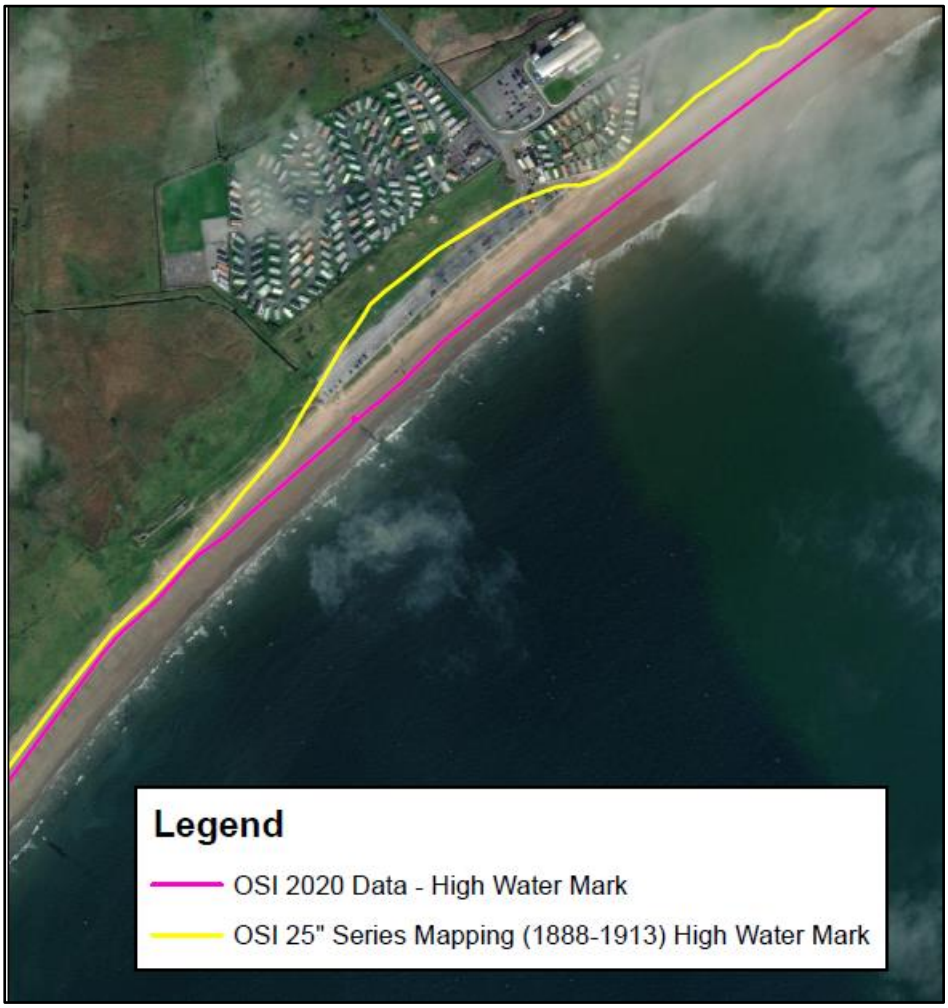


Figure 6.1: Aerial view of the area of Claycastle Beach identifying OSI High Water Marks (HWMs)

Confidentiality of Sites of Protected Species

While seeking to ensure a comprehensive survey and appraisal of environmental impact, including surveys of protected birds to accompany the NIS, EirGrid is also aware of, and in agreement with, best practice to retain confidentiality of sites where such protected species may be present. As such, ABP will note that in Appendix 8.6 of Volume 3C (Ireland onshore EIAR) and Appendix D of Volume 6A (Ireland onshore NIS), certain information contained in

supporting Winter Bird surveys has been redacted where it could give information relating to the site of nesting hen harriers. Such redaction does not diminish the comprehensive surveys undertaken, which have assisted in informing the appraisal and conclusions of both the EIAR and NIS.

7 Conclusion

Having regard to the following:

- The requirements of EU energy law and energy policy, and in particular the designation of the overall planned Celtic Interconnector Project as a Project of Common Interest pursuant to EC Regulation No. 347/2013 (the TEN-E Regulation);
- The provisions of Project Ireland 2040 – the National Planning Framework;
- The provisions of the National Policy Statement on Electricity Interconnection (2018);
- The provisions of the Government White Paper - Ireland's Transition to a Low Carbon Energy Future 2015-2030;
- The provisions of the Southern Regional Assembly Regional Spatial and Economic Strategy (RSES) in respect of electricity infrastructure and in specific respect of the Celtic Interconnector project (2020);
- The provisions of the Cork County Development Plan 2014 as varied, and the Draft Cork County Development Plan 2022-2028;
- The provisions of the Cobh and Midleton Municipal District Local Area Plans;
- The stated need for, and benefits of, the proposed development, namely:
  - Provide competition to the electricity market to the benefit of the Irish consumer,
  - Help Ireland to transition to a low carbon energy future,
  - Facilitate increased levels of renewable energy within the Irish and European electricity system,
  - Enhance the security of supply to Ireland,
  - Provide a direct telecommunication link to the European continent,
- The nature, scale and location of the proposed development, primarily as an underground cable (UGC) and associated infrastructure development, and including the provision of industrial-style building and infrastructure on lands zoned for industrial development;
- The nature of the receiving environment, including the nature of the public road network along which the UGC is proposed to be laid, the pattern of development in the area, and the nature of the landscape including any specific conservation and amenity designations along or in proximity to the proposed development;
- The consideration of alternatives for the design and routing/siting of the proposed development;
- Submissions and other input and advices received from statutory and non-statutory stakeholders during the project development process including the Strategic Infrastructure Division (SID) of An Bord Pleanála and Cork County Council, as well as from the general public, communities and landowners;
- The documentation prepared for the application for Statutory Approval, including the Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS);

It is considered by EirGrid that, subject to compliance with the mitigation measures set out in the NIS and the EIAR, the proposed development:

- Would be in accordance with National policies and guidelines and with regional and local development plan policy;
- Would not seriously injure the amenities of the area or of property in the vicinity;
- Would not seriously injure the visual or recreational amenities of the area;
- Would not be prejudicial to public health or safety;
- Would not detract from the character or setting of features of architectural or archaeological heritage or the cultural heritage of the area;
- Would not seriously injure the biodiversity in the area; and,
- Would be acceptable in terms of traffic safety and convenience.

Having regard to the above, it is concluded by EirGrid that the proposed development would, therefore be in accordance with the proper planning and sustainable development of the area.

Appendices

Appendix A: Notification Letter from the Board confirming SID status of project

Our Case Number: ABP-302725-18

An Bord Pleanála

Tomas Bradley
Eirgrid Plc
The Oval
160 Shelbourne Road,
Ballsbridge
D04 FW28

Date: 3rd June 2021

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

Dear Sir,

Please be advised that following consultations under section 182E of the Planning and Development Act, 2000, as amended, the Board hereby serves notice that it is of the opinion that the proposed development falls within the scope of section 182A of the Planning and Development Act, 2000 as amended. Accordingly, the Board has decided that the proposed development would be strategic infrastructure within the meaning of section 182A of the Planning and Development Act, 2000, as amended. Any application for approval for the proposed development must therefore be made directly to An Bord Pleanála under section 182A(1) of the Act.

Please also be informed that the Board considers that the pre-application consultation process in respect of this proposed development is now closed.

Attached is a list of prescribed bodies to be notified of the application for the proposed development.

In accordance with section 146(5) of the Planning and Development Act, 2000, as amended, the Board will make available for inspection and purchase at its offices the documents relating to the decision within 3 working days following its decision. This information is normally made available on the list of decided cases on the website on the Wednesday following the week in which the decision is made.

The attachment contains information in relation to challenges to the validity of a decision of An Bord Pleanála under the provisions of the Planning and Development Act, 2000, as amended.

If you have any queries in relation to the matter please contact the undersigned officer of the Board.

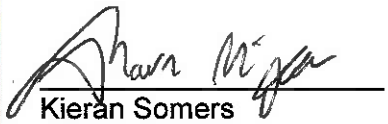
Teil	**Tel**	(01) 858 8100
Glao Áitiúil	**LoCall**	1890 275 175
Facs	**Fax**	(01) 872 2684
Láithreán Gréasáin	**Website**	www.pleanala.ie
Ríomhphost	**Email**	bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,



Kieran Somers
Executive Officer
Direct Line: 01-873 7250

VC11

Teil	**Tel**	(01) 858 8100
Glao Áitiúil	**LoCall**	1890 275 175
Facs	**Fax**	(01) 872 2684
Láithreán Gréasáin	**Website**	www.pleanala.ie
Ríomhphost	**Email**	bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Judicial Review Notice

Judicial review of An Bord Pleanála decisions under the provisions of the Planning and Development Acts (as amended).

A person wishing to challenge the validity of a Board decision may do so by way of judicial review only. Sections 50, 50A and 50B of the Planning and Development Act 2000 (as substituted by section 13 of the Planning and Development (Strategic Infrastructure) Act 2006, as amended/substituted by sections 32 and 33 of the Planning and Development (Amendment) Act 2010 and as amended by sections 20 and 21 of the Environment (Miscellaneous Provisions) Act 2011) contain provisions in relation to challenges to the validity of a decision of the Board.

The validity of a decision taken by the Board may only be questioned by making an application for judicial review under Order 84 of The Rules of the Superior Courts (S.I. No. 15 of 1986). Sub-section 50(6) of the Planning and Development Act 2000 requires that subject to any extension to the time period which may be allowed by the High Court in accordance with subsection 50(8), any application for judicial review must be made within 8 weeks of the decision of the Board. It should be noted that any challenge taken under section 50 may question only the validity of the decision and the Courts do not adjudicate on the merits of the development from the perspectives of the proper planning and sustainable development of the area and/or effects on the environment. Section 50A states that leave for judicial review shall not be granted unless the Court is satisfied that there are substantial grounds for contending that the decision is invalid or ought to be quashed and that the applicant has a sufficient interest in the matter which is the subject of the application or in cases involving environmental impact assessment is a body complying with specified criteria.

Section 50B contains provisions in relation to the cost of judicial review proceedings in the High Court relating to specified types of development (including proceedings relating to decisions or actions pursuant to a law of the state that gives effect to the public participation and access to justice provisions of Council Directive 85/337/EEC i.e. the EIA Directive and to the provisions of Directive 2001/12/EC i.e. Directive on the assessment of the effects on the environment of certain plans and programmes). The

general provision contained in section 50B is that in such cases each party shall bear its own costs. The Court however may award costs against any party in specified circumstances. There is also provision for the Court to award the costs of proceedings or a portion of such costs to an applicant against a respondent or notice party where relief is obtained to the extent that the action or omission of the respondent or notice party contributed to the relief being obtained.

General information on judicial review procedures is contained on the following website, www.citizensinformation.ie.

Disclaimer: The above is intended for information purposes. It does not purport to be a legally binding interpretation of the relevant provisions and it would be advisable for persons contemplating legal action to seek legal advice.

ABP-302725-18

The following is a schedule of prescribed bodies considered relevant by the Board:

- Cork County Council
- Minister for Housing, Local Government and Heritage
- Minister for Environment, Climate and Communications
- Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media
- Minister for Agriculture, Food and the Marine
- Minister for Transport
- Transport Infrastructure Ireland
- Environmental Protection Agency
- Irish Water
- Commission for Regulation of Utilities
- Fáilte Ireland
- An Taisce
- The Heritage Council
- An Chomhairle Ealaion
- Inland Fisheries Ireland
- Coras Iompair Eireann
- Commission for Railway Regulation
- Railway Safety Commission
- Irish Aviation Authority
- Health and Safety Executive
- The Southern Regional Assembly

Appendix B: Notification Letter from the Board under Article 10(1)(a) of the TEN-E Regulation confirming PCI status of project

Our Ref: PCI Project 1.6

An Bord Pleanála

Mr. Eoghan Tuite,
Senior Lead Engineer,
EirGrid,
The Oval, 160 Shelbourne Road,
Ballsbridge,
Dublin D04 FW28

21st March, 2019.

Dear Mr. Tuite,

I refer further to your letter of 24th December, 2018 concerning the request for the project known as the Celtic Interconnector Project (France – Ireland interconnection between La Martyre (FR) and Great Island or Knockraha, (IE) 1.6 on Union List) to enter the Permit Granting Process of Regulation (EU) No. 347/2013.

Under Article 10.1(a) of Regulation (EU) No. 347/2013, not later than three months following the receipt of the notification, An Bord Pleanála, as Competent Authority, shall, including on behalf of other authorities concerned, acknowledge or reject the notification. This letter is the response pursuant to Article 10.1(a).

Accordingly, as Competent Authority we inform you, on behalf of the authorities concerned, that the project is considered mature enough to enter the Permit Granting Process under Chapter III of EU Regulation No. 347/2013 (see Appendix I).

Please note that the date of signature of this acknowledgement of the notification by the competent authority shall serve as the start of the permit granting process. Where two or more Member States are concerned, the date of acceptance of the last notification by the competent authority concerned shall serve as the date of the start of the permit granting process.

You will be aware that as per Article 9(3) of the regulation the project promoter shall, within an indicative period of three months to 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.

Teil Tel (01) 858 8100
Glao Áitiúil LoCall 1890 275 175
Facs Fax (01) 872 2684
Láithreán Gréasáin Website www.pleanala.ie
Ríomhphost Email bord@pleanala.ie

64 Sráid Maoilbhride
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

We shall inform the French competent authority of the issuing of the acknowledgement of your notification by us as Competent Authority for Ireland.

Yours sincerely,

Seamus Grant,
Executive Officer,
PCI Unit.

Appendix I – Responses by Authorities

Authority Concerned	Consent / Licence	Response from Authority
An Bord Pleanála (Strategic Infrastructure)	Planning Approval	The project is mature enough to enter the process.
Commission for Regulation of Utilities	Authorisation to construct an interconnector	The project is mature enough to enter the process.
Commission for Regulation of Utilities	Electricity Interconnector Operator Licence	The project is mature enough to enter the process.
Cork County Council Building Control	Commencement Notice	The project is mature enough to enter the process.
Cork County Council	Road Opening Licence	The project is mature enough to enter the process.
Department of Agriculture	Tree Felling Licence	The project is mature enough to enter the process.
Minister for Culture, Heritage & Gaeltacht	Excavation Licence	The project is mature enough to enter the process.
Minister for Culture, Heritage & Gaeltacht	National Monuments	The project is mature enough to enter the process.
Minister for Culture, Heritage & Gaeltacht	Detection Device Consent	The project is mature enough to enter the process.
Cork County Council	Trade Effluent Discharge Licence	The project is mature enough to enter the process.
Cork County Council	Certificate of Registration	The project is mature enough to enter the

		process.
Cork County Council Building Control	Fire Safety Cert	The project is mature enough to enter the process.
Cork County Council	DAC	The project is mature enough to enter the process.
Environmental Protection Agency	Waste Disposal	The project is mature enough to enter the process.
Minister for Housing, Planning & Local Government	Foreshore Lease	The project is mature enough to enter the process.
Environmental Protection Agency	Dumping at Sea Permit	The project is mature enough to enter the process.
Department of Communications, Climate Action and Environment	Consent for works under the Continental Shelf Act	The project is mature enough to enter the process.
Minister for Culture, Heritage & Gaeltacht	Excavation Licence (Archaeological)	The project is mature enough to enter the process.
Minister for Culture, Heritage & Gaeltacht	Dive Survey Licence	The project is mature enough to enter the process.
Minister for Culture, Heritage & Gaeltacht	National Monuments	The project is mature enough to enter the process.

Appendix C: Pre-Application Notification issued to the Irish CA for the Celtic Interconnector Project

Celtic Interconnector

TEN-E Regulation

Pre-Application Notification

December 2018

EIRGRID GROUP

Co-financed by the European Union
Connecting Europe Facility

Table of Contents

Introduction

The Celtic Interconnector is a proposed electrical link which will enable the movement of electricity between Ireland and France and will be the first direct energy link between the two countries, running from the south coast of Ireland to the north-west coast of France. The project promoters are EirGrid plc and Réseau de Transport d'Électricité (RTE), the Transmission System Operators (TSOs) in Ireland and France.

EirGrid has an obligation under its TSO licence to explore and develop opportunities for interconnection of the Irish power system with other systems and has previously fulfilled this obligation by developing the East West Interconnector between Ireland and Wales which was delivered in 2012.

The European Commission sees increased interconnection as a key step towards achieving a more integrated electricity system and considers the Celtic Interconnector to be an important move towards achieving such integration.

The Celtic Interconnector was designated in 2013 as a Project of Common Interest (PCI) under the Regulation for the trans-European energy infrastructure (EU 347/2013) (hereafter referred to as the TEN-E Regulation). The Regulation seeks to modernise and expand Europe's energy infrastructure and to interconnect networks across borders to meet the Union's core energy policy objectives of competitiveness, sustainability and security of supply. The project has retained its PCI designation during subsequent reviews in 2015 and 2017.

PCI projects can benefit from accelerated planning and permit granting and also have access to financial support from the Connecting Europe Facility (CEF). The Celtic Interconnector has already been supported with over €3.5m provided for the Feasibility Phase of the project and a further €4m allocated for the current phase of the project.

This document provides formal notification under Article 10(1)(a) of the TEN-E Regulation to An Bord Pleanála, in its role as the delegated National Competent Authority (NCA) in Ireland, that EirGrid intends to commence the permit granting process for PCI 1.6, the Celtic Interconnector project. In France notification has already been submitted by RTE to the Ministère de la Transition Écologique et Solidaire, in its role as the delegated NCA in France, in July 2018 and it was accepted in September 2018.

This document sets out the necessary information to satisfy the pre-application requirements outlined in Article 10(1)(a) of the TEN-E Regulation and in Section 4 of An Bord Pleanála's Project of Common Interest Manual of Permit Granting Process Procedures (March 2018)[1].

Further information about the project can be found on the project websites at:

http://www.eirgridgroup.com/the-grid/projects/celtic-interconnector/the-project/

http://www.rte-france.com/en/project/celtic-interconnector-interconnection-project-between-france-and-ireland/

[1] http://www.pleanala.ie/PCI/Projects%20of%20Common%20Interest%20-%20Manual%20of%20Procedures%20%2020March2018.pdf

Project Information

Project Promoters

The Celtic Interconnector is being jointly developed by EirGrid plc and Réseau de Transport d'Électricité (RTE).

EirGrid plc
EirGrid plc is a wholly owned subsidiary of EirGrid Group and holds licences as independent electricity Transmission System Operator (TSO) and Market Operator (MO) in the wholesale trading system in Ireland, and is the owner of the System Operator Northern Ireland (SONI Ltd), the licensed TSO and market operator in Northern Ireland. EirGrid plc previously developed and delivered the East West Interconnector between Ireland and Wales, which has been in operation since 2012.

Réseau de Transport d'Électricité
Réseau de Transport d'Électricité (RTE) is the French TSO; it owns, operates and develops the French Electricity Transmission System with the primary objectives of balancing electricity generation with consumption, guaranteeing the secure operation of the power system.

Contact Details

The primary contact details for the project promoters are provided in Table 1 below.

Table 1 - Celtic Interconnector project promoter primary contact details

EirGrid	**RTE**
The Oval, 160 Shelbourne Road, Ballsbridge, Dublin, D04 FW28, Ireland. Tel: +353 (0)1 677 1700 Company No.: 338 522	Immeuble WINDOW, 7C, Place du Dôme, 92073 PARIS LA DEFENSE CEDEX, France. Tel: +33 (0)1 79 24 80 00 Company No.: 444 619 258

National Competent Authorities

The National Competent Authorities (NCAs) for each jurisdiction relating to the Celtic Interconnector are listed in Table 2 below.

Table 2 - National Competent Authorities for the Celtic Interconnector Project

Country	National Competent Authority	Contact Details
Ireland	An Bord Pleanála	Seamus Grant, Executive Officer, An Bord Pleanála, Projects of Common Interest Unit, 64 Marlborough Street, Dublin 1. Tel: +353 (0)1 858 8100 Email: s.grant@pleanala.ie
France	Ministère de la Transition Écologique et Solidaire	Sidonie BLANCHARD Chargée de mission infrastructures de transport d'électricité, Direction Générale de l'Energie et du Climat, Ministère de la Transition Écologique et Solidaire, 246 Boulevard Saint-Germain, Paris 75007, France. Tel: +33 (0)1 40 81 85 90 Email: sidonie.blanchard@ecologique-solidaire.gouv.fr

Irish Consenting Authorities

Significant public infrastructure projects such as the Celtic Interconnector require a wide range of consents to commence construction and to operate. This section of the notification identifies the consents which are anticipated to be required for the onshore and offshore aspects of the development in Ireland.

In line with Section 4.1 of the Manual of Permit Granting Procedures EirGrid has contacted all of the relevant consenting authorities and has commenced the necessary pre-application processes.

Table 3 - Onshore Consents to be submitted by mid-2020 (required as part of statutory consenting process)

Consent Type & area of project required for	Consenting Authority	Legislation under which consent is required / granted	Contact Details
Planning Approval *(required for the onshore elements of the interconnector)*	An Bord Pleanála	• Sections 182A of the Planning and Development Acts, 2000 (as amended) • Part 18 of the Planning and Development Regulations 2001 (as amended)	Philip Green SIDS@pleanala.ie
Authorisation to Construct an Interconnector *(required for the entire interconnector)*	Commission for Regulation of Utilities	Section 16 of the Electricity Regulation Act 1999 (as amended)	Roisin Cullinan rcullinan@cru.ie
Electricity Interconnector Operator Licence *(required for the entire interconnector)*	Commission for Regulation of Utilities	Energy (Miscellaneous Provisions) Act 2006	Stuart Coleman scoleman@cru.ie

With regard to the principal onshore consent, EirGrid has engaged with the Strategic Infrastructure Development (SID) unit of An Bord Pleanála for the purposes of a pre-application consultation for the intended SID application. By letter dated 12th October 2018, the SID unit of An Bord Pleanála stated that the project was not defined enough for the purposes of entering into such pre-application consultation. This related to the landfall points and proposed sites of the converter station not being sufficiently defined.

As further outlined within this notification EirGrid will have defined the landfall point and proposed site of the converter station within a timeframe of 12 months from the date

lodgement of this notification. EirGrid will thereafter re-submit an application to the SID unit of An Bord Pleanála for the purposes of pre-application consultation for the SID application. This will further enable the completion of the pre-application consultation of the SID unit within the remaining one year period of the two year time period allowed for the completion of the pre-application stage of the PCI process under Article 10(1) of the TEN-E Regulation. This is further in accordance with Section 4.1 of the Manual of Permit Granting Procedures which says in relation to the notification stage:

> "Any such report, plan or specification accompanying the notification need not be complete at this stage of the process. However, the level of detail supplied must be sufficient to assure a relevant authority that the complexity and detail required is fully understood by the project promoter. *Where any such detail supplied is not complete a timescale for completion should be given and this timescale should be linked to a timescale for submission of any application to the relevant authority."*

EirGrid have therefore provided (a) a timescale for completion of any incomplete specifications relating to the landfall points and sites for converter station and (b) linked this with a timescale for submission of the pre-application consultation of An Bord Pleanála. EirGrid therefore submits that the proposed project is mature enough to enter the permit granting process in accordance with Article 10(1) of the TEN-E Regulation.

Table 4 - Onshore Consents to be applied for post 2022 during project implementation (required post statutory consenting decisions)

Consent Type & area of project potentially required for	Consenting Authority	Legislation under which consent is required / granted	Contact Details
Commencement Notice / 7 Day Notice *(required for the onshore elements of the interconnector)*	Building Control Authority in relevant area	Building Control Act 1990 (as amended) and Building Control Regulations 1997 (as amended)	***Overall Contact:*** Michael Lynch, Director of Services (Planning). MichaelW.Lynch@CorkCoCo.ie ***Consent Contact:*** John Sheehan, Assistant Chief Fire Officer, Midleton Fire Station. JohnM.Sheehan@CorkCoCo.ie
Road Opening Licence *(required for the DC and AC circuit routes onshore elements of the interconnector)*	Cork County Council	Section 13 of the Roads Act 1993 (as amended)	***Overall Contact:*** Michael Lynch, Director of Services (Planning). MichaelW.Lynch@CorkCoCo.ie ***Consent Contact:*** Aidan Weir, Roads and Transportation Directorate. Aidan.Weir@CorkCoCo.ie
Tree Felling Licence *(potentially required for converter station onshore element of the interconnector)*	Department of Agriculture, Food and the Marine	Sections 37 and 40 of the Forestry Act 1946 (as amended)	Ann Cunningham, Forestry Division, Department of Agriculture, Food and the Marine. ann.cunningham@agriculture.gov.ie
Excavation Licence (Archaeological) *(potentially required for some of the onshore elements of the interconnector)*	Minister for Culture, Heritage and the Gaeltacht (licence issued by the Archaeological Licensing Unit of the National Monuments Service)	Section 26 of the National Monuments Act 1930 (as amended)	Joanne Lyons, Development Applications Unit, Department of Culture, Heritage and the Gaeltacht. manager.dau@chg.gov.ie
Ministerial Consent for works at / near a National Monument *(potentially required for some of the onshore elements of the interconnector)*	Minister for Culture, Heritage and the Gaeltacht	Section 14 of the National Monuments Act 1930 (as amended)	Joanne Lyons, Development Applications Unit, Department of Culture, Heritage and the Gaeltacht. manager.dau@chg.gov.ie

Detection Device Consent (Archaeological) *(potentially required for some of the onshore elements of the interconnector)*	Minister for Culture, Heritage and the Gaeltacht	Section 2 of the National Monuments Act 1987 (as amended)	Joanne Lyons, Development Applications Unit, Department of Culture, Heritage and the Gaeltacht. manager.dau@chg.gov.ie
Trade Effluent Discharge Licence *(potentially required for converter station onshore element of the interconnector)*	Cork County Council	Local Government (Water Pollution Acts), 1977 and 1990	***Overall Contact:*** Michael Lynch, Director of Services (Planning). MichaelW.Lynch@CorkCoCo.ie ***Consent Contact:*** Ted O'Leary, SEO Environment Directorate. Ted.OLeary@CorkCoCo.ie
Certificate of Registration *(potentially required for converter station onshore element of the interconnector)*	Cork County Council	Article 27 European Communities (Waste Directive) Regulations, 2011	***Overall Contact:*** Michael Lynch, Director of Services (Planning). MichaelW.Lynch@CorkCoCo.ie ***Consent Contact:*** Pauline Falvey, Staff Officer. Pauline.Falvey@CorkCoCo.ie
Fire Safety Certificate *(potentially required for converter station onshore element of the interconnector)*	Building Control Authority in relevant area	Building Control Act 1990 (as amended) and Building Control Regulations 1997 (as amended)	***Overall Contact:*** Michael Lynch, Director of Services (Planning). MichaelW.Lynch@CorkCoCo.ie ***Consent Contact:*** John Sheehan, Assistant Chief Fire Officer, Midleton Fire Station. JohnM.Sheehan@CorkCoCo.ie
Disability Access Certificate *(potentially required for converter station onshore element of the interconnector)*	Cork County Council	Article 20D of the Building Control Regulations, 1997 to 2009	***Overall Contact:*** Michael Lynch, Director of Services (Planning). MichaelW.Lynch@CorkCoCo.ie ***Consent Contact:*** Paul Cunningham, Building Control Officer, Midleton Fire Station. Paul.Cunningham@CorkCoCo.ie
Waste Disposal Licence / Permit *(potentially required for converter station onshore element of the interconnector)*	Environmental Protection Agency	Waste Management Act 1996 (as amended)	Ciara Maxwell, Office of Environmental Sustainability, Environmental Protection Agency. c.maxwell@epa.ie

Table 5 - Offshore Consents to be submitted by mid-2020 (required as part of statutory consenting process)

Consent Type & area of project potentially required for	Consenting Authority	Legislation under which consent is required / granted	Contact Details
Foreshore Lease *(required for the offshore elements of the interconnector)*	Minister for Housing, Planning and Local Government	• Foreshore Acts 1933 to 2011 • Foreshore and Dumping at Sea (Amendment) Act 2009 • Section 10 (2) of the Foreshore Act regulates privately owned Foreshore. • Habitats Directive	Ms. Jeanine Dunne / Mr. Pat O'Neill, Marine Planning - Foreshore Section (MPFS), Department of Housing, Planning and Local Government. jeanine.dunne@housing.gov.ie pat.oneill@housing.gov.ie
Dumping at Sea Permit *(potentially required for the offshore elements of the interconnector)*	Environmental Protection Agency (EPA) (The Foreshore and Dumping at Sea (Amendment) Act 2009 transferred certain functions relating to dumping at sea from Minister for Agriculture, Fisheries and Food to the EPA in 2010)	Dumping at Sea Acts, 1996 to 2010 (implements OSPAR convention requirements for disposal of dredged material at sea)	Ciara Maxwell, Office of Environmental Sustainability, Environmental Protection Agency. c.maxwell@epa.ie
Ministerial Consent for works under the Continental Shelf Act *(potentially required for the offshore elements of the interconnector)*	Minister for Communications, Climate Action and Environment	Section 5, Continental Shelf Act, 1968	Bill Morrissey, Principal Officer, Petroleum Affairs Division, Department of Communications, Climate Action and Environment. bill.morrissey@dccae.gov.ie

Table 6 - Offshore Consents to be applied for post 2022 during project implementation (required post statutory consenting decisions)

Consent Type & area of project potentially required for	**Consenting Authority**	**Legislation under which consent is required / granted**	**Contact Details**
Excavation Licence (Archaeological) *(potentially required for the offshore elements of the interconnector)*	Minister for Culture, Heritage and the Gaeltacht (Licence issued by the Archaeological Licensing Unit of the National Monuments Service)	Section 26 of the National Monuments Act 1930 (as amended)	Joanne Lyons, Development Applications Unit, Department of Culture, Heritage and the Gaeltacht. manager.dau@chg.gov.ie
Dive Survey Licence *(potentially required for the offshore elements of the interconnector)*	Minister for Culture, Heritage and the Gaeltacht (licence issued by the Archaeological Licensing Unit of the National Monuments Service)	Section 3(5) of the National Monuments Act 1987	Joanne Lyons, Development Applications Unit, Department of Culture, Heritage and the Gaeltacht. manager.dau@chg.gov.ie
Ministerial Consent for works at / near a National Monument *(potentially required for the offshore elements of the interconnector)*	Minister for Culture, Heritage and the Gaeltacht	Section 14 of the National Monuments Act 1930 (as amended)	Joanne Lyons, Development Applications Unit, Department of Culture, Heritage and the Gaeltacht. manager.dau@chg.gov.ie

Project Description

The proposed Celtic Interconnector, which will enable the movement of electricity between France and Ireland, will support Europe's transition to the Energy Union by applying downward pressure on the cost of electricity to consumers in Ireland and France, by strengthening energy security between the two countries and by facilitating the growth of renewables and the transition to a low carbon energy future.

The Celtic Interconnector is well aligned to support the achievement of Europe's energy ambitions:

- It will enable the movement of electricity across Ireland, France and continental Europe, increasing competition in the electricity market and applying downward pressure on cost to the benefit of consumers;
- It will enhance the security of supply for both Irish and French electricity consumers;
- It will support Europe's transition to a low carbon energy future by increasing the market available for renewable electricity and supporting the development of the renewable energy sector;
- It will provide Ireland's only energy connection to an EU Member State once the United Kingdom leaves the EU; and
- It will help to improve telecommunications between Ireland and continental Europe by providing a direct fibre optic link between both countries.

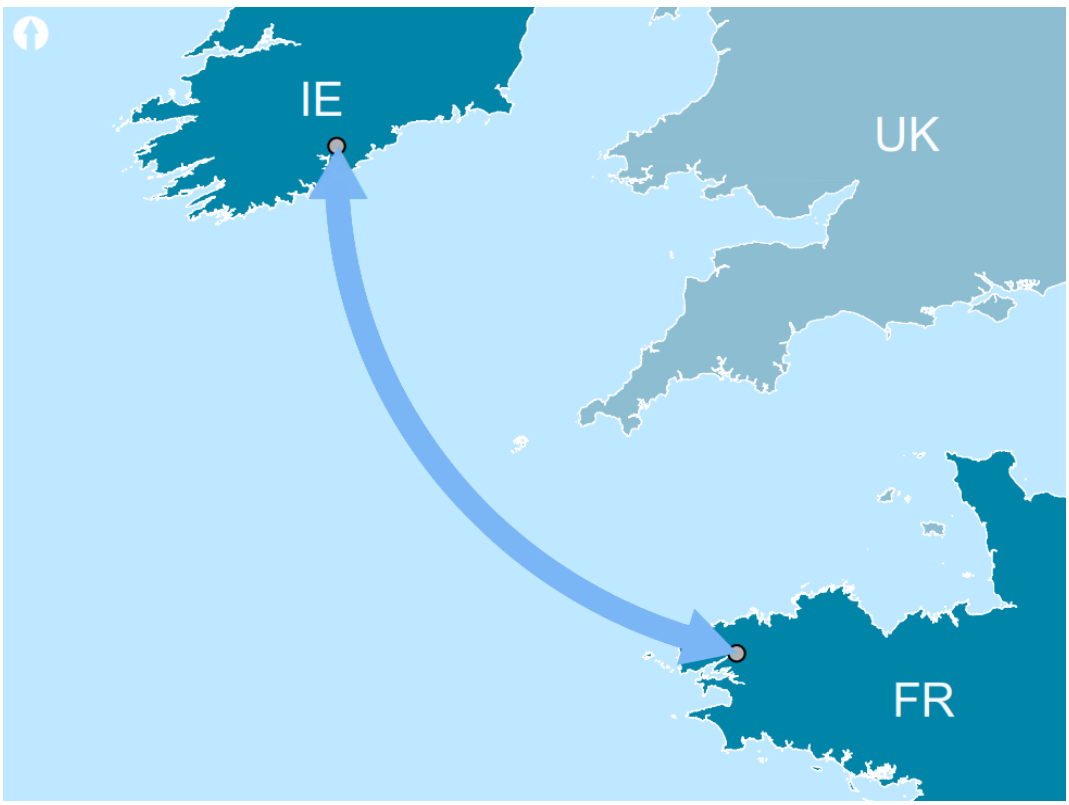


Figure 1 - Celtic Interconnector - proposed electricity interconnector between Ireland and France

Project Elements

The Celtic Interconnector project involves the construction of an electrical circuit between Ireland and France using High Voltage Direct Current (DC) technology, the global standard for the transfer of electricity over long distances using underground technology. The interconnector would have a capacity of 700 MW (equivalent to the power used by 450,000 homes) and measure approximately 575 km in length. The longest spatial element of the Celtic Interconnector would be the submarine circuit which would measure approximately 500 km out of the total 575 km. The interconnector would form a link between the south coast of Ireland and the coast of Brittany in North West France (Nord-Finistère).

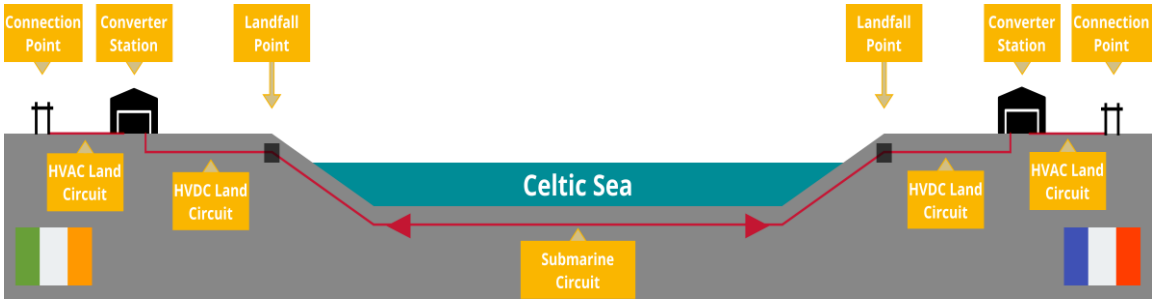


Figure 2 - Celtic Interconnector Project Elements

The main elements of the interconnector are illustrated in Figure 2 above and consist of:

- A submarine circuit, approximately 500km in length placed on or beneath the seabed between France and Ireland. The submarine circuit will pass though the territorial waters of Ireland and France and through the Exclusive Economic Zones (EEZs) of Ireland, the United Kingdom (UK) and France.

In addition to the submarine circuit the infrastructure in both Ireland and France will include:

- A landfall point where the submarine circuit comes onshore;
- A High Voltage Direct Current (HVDC) land circuit between the landfall point and a converter station. This circuit is proposed using underground technology and consists of a pair of cables. There are currently two types of HVDC cable available, either Cross Linked Poly-Ethylene insulation (XLPE) or Mass Impregnated Non-Draining (MIND) insulation technology. Typically these cables are each 150mm in diameter and will operate at an expected voltage of 320kV;
- A converter station, to convert the electricity from HVDC to High Voltage Alternating Current (HVAC), which is used on the respective transmission grids in each country. The converter stations will use Voltage Source Conversion (VSC) technology and will operate at an expected voltage of 320kV and typically include a range of technical equipment some of which must be located indoors in a series of large buildings, potentially up to 25m in height. A typical converter station also includes:

    - Control Room;
    - Converter Power Electronics and associated DC equipment;
    - Alternating Switchgear;
    - Transformers and other associated AC equipment;
    - Ancillary equipment and spares building.
- A relatively short HVAC land circuit between the converter station and the connection point to the grid. This circuit is proposed using underground technology; and
- A connection point to an existing substation on the transmission grid.

A fibre optic cable would also be laid along the entire route for operational control, communication and telemetry purposes. There would be additional capacity available on the fibre optic cable which could be made available to the market. This model was previously established with the East West Interconnector.

At present there is no direct telecommunications connectivity between Ireland and France, all existing traffic between Ireland, France and the rest of mainland Europe must first pass through the UK land bridge.

A direct telecommunications connection between Ireland and France would provide improved latency performance between the island of Ireland and continental Europe. As well as improved latency, a direct fibre connection between Ireland and France would yield additional strategic benefits for Ireland, including:

- Increased resilience and security of supply;
- Single point of failure reduction;
- Cost reductions for local businesses;
- Increased competitiveness of the region;
- Providing a marketing tool;
- Potential to attract new competition.

EirGrid has produced a detailed infographic, as shown in Figure 3 overleaf, to illustrate in further detail the various elements of the interconnector and how they would be installed.

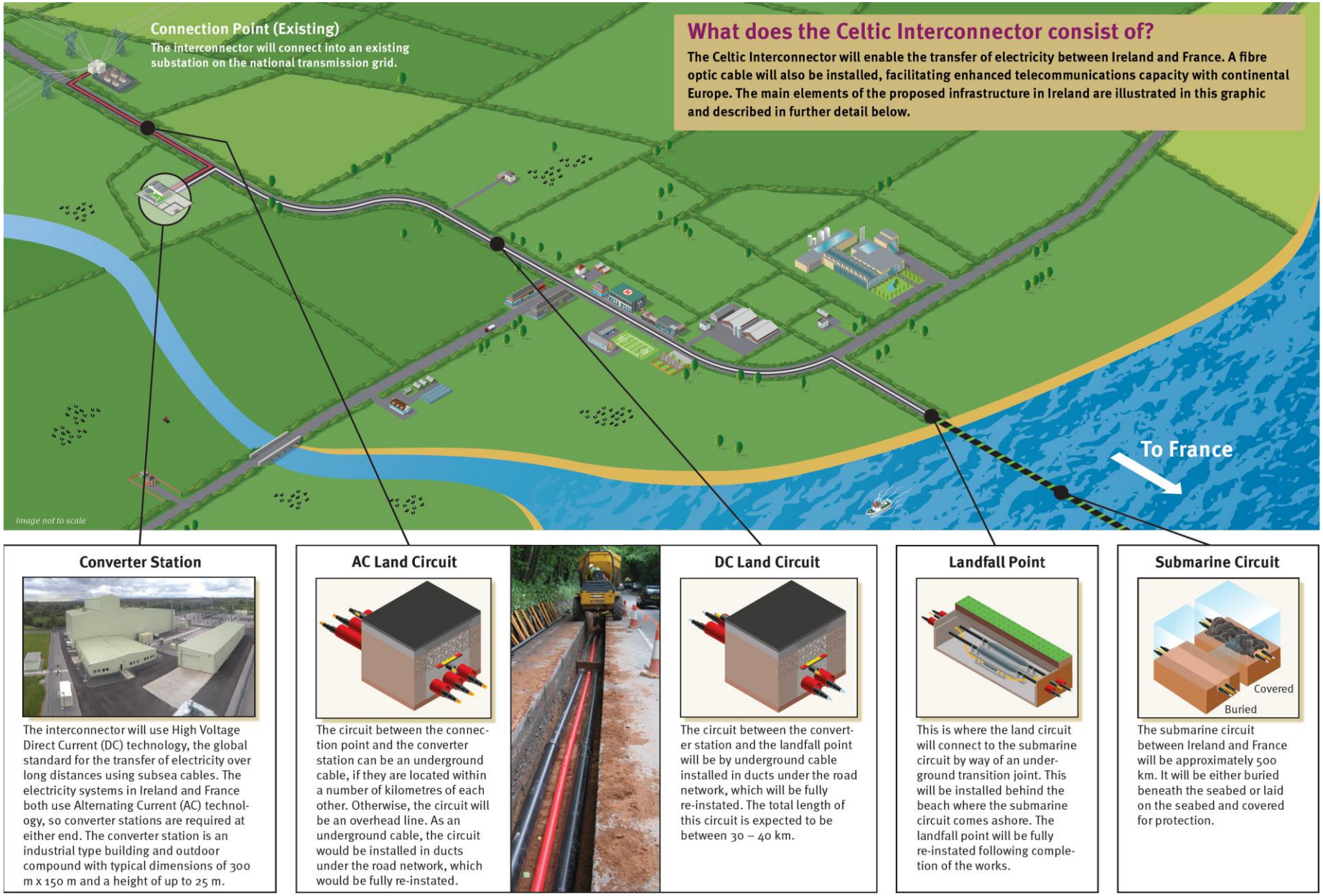


Figure 3 - What does the Celtic Interconnector consist of?

Consultation and Engagement

As a Project of Common Interest (PCI) the Celtic Interconnector is a key cross border infrastructure project that links the energy systems of EU countries. Its benefits include the furthering of European energy policy in regard to achieving the community's climate objectives. In turn this achievement will provide affordable, secure and sustainable energy, and the long-term decarbonisation of the economy to the benefit of all citizens.

To integrate and involve citizens in the PCI process the project requirements include a distinct obligation for considerable public stakeholder participation via communication, engagement and consultation. At EirGrid we are committed to stakeholder engagement and consultation and operate a bespoke *Framework for Grid Development* approach to all projects as outlined in the *Have your Say document*[2]. This step by step approach to planning the grid facilitates engagement and consultation with our stakeholders and the public which helps us to explore options fully and make more informed decisions.

Figure 4 - EirGrid Framework for Grid Development Steps

Step 1 of the process was completed as part of the preliminary feasibility studies carried out on the project which resulted in establishing the benefits of the project and promoting further studies. EirGrid's new Framework for Grid Development was launched in 2016 and at that stage the Celtic Interconnector was aligned to Step 2.

To date we have completed Step 2 consultation and engagement which has included:

- Publication of a Project Information page on the EirGrid website;
- Publication of a detailed Project Update Brochure for Step 2[3] (2017);

[2] http://www.eirgridgroup.com/__uuid/7d658280-91a2-4dbb-b438-ef005a857761/EirGrid-Have-Your-Say_May-2017.pdf
[3] http://www.eirgridgroup.com/site-files/library/EirGrid/Celtic-Interconnector-Project-Update-Brochure.pdf

- Engagement in stakeholder outreach with elected representatives, municipal districts, local businesses, industry reps, community and environmental groups, fisheries groups;
- Specific public consultation on the 2017 marine survey foreshore licence.

Step 3 consultation and engagement is ongoing and includes:

- Publication of a detailed Project Update Brochure for Step 3[4] (2018);
- Community Information Sessions in project landfall point communities and communities potentially impacted by the onshore elements of the project;
- Engagement in stakeholder outreach with elected representatives, municipal districts, local businesses, industry reps, community and environmental groups, fisheries groups;
- Specific public consultation on the 2018 marine survey foreshore licence;
- Planned ongoing consultation with stakeholders in line with project development.

EirGrid is committed to meeting all interested parties on the project and will endeavour to maximise all opportunities available for persons and organisations to engage with the project. In 2018 a dedicated, locally based, Community Liaison Officer was appointed to the Celtic Interconnector project. Based in Cork the officer is tasked with ensuring the highest levels of community engagement are met in line with EirGrid and PCI requirements.

Further to EirGrid's commitment to stakeholder consultation and engagement the PCI designation under the TEN-E Regulation brings a number of distinct requirements which will also be met. These include:

- Production of a PCI brochure informing citizens of both partner countries as to the project specifics and benefits;
- Publication and curation of a joint project website;
- A dedicated PCI public consultation event.

Ongoing close cooperation with our project partners is a critical part of the project development process, thereby ensuring clear and correct information on the project is available to all European citizens and that all obligations with regard to public consultation and engagement are being met.

For each specific consultation held on the project materials are prepared in order to enhance and support the consultation process with a view to securing effective engagement and enabling it to influence the location and form of the development. This collateral is delivered through various project specific means including public advertisements, information brochures, project specific web-site, consultation events and community outreach meetings.

[4] http://www.eirgridgroup.com/site-files/library/EirGrid/Celtic-Interconnector-Project-Update-Brochure-2018.pdf

Project Development

The Celtic Interconnector project has been in development since 2011 and is now at a mature stage. EirGrid and RTE studied the high level benefits, technology and costs of the project during the Preliminary Feasibility Phase. After this phase was completed in 2014, EirGrid and RTE agreed to proceed to the Feasibility Phase of the project. A detailed suite of activities were carried out to confirm the project's feasibility including:

- Desktop study of marine route options;
- Marine survey along best performing route between Ireland and France;
- Onshore studies of connection options and associated grid assessment;
- Economic and financial analysis; and
- Cost assessment based on findings of technical studies.

Following the completion of the Feasibility Phase in 2016, EirGrid and RTE were satisfied as to the feasibility of the project and agreed to proceed to the current phase of Initial Design and Pre-Consultation. This phase has focused on:

- Initial design of the project, including refinement of marine route options;
- Technical studies associated with the project's onshore development;
- Public consultation on the general location and configuration of the project;
- Pre-application consultation activities with various Consenting Authorities;
- Submission of an Investment Request[5] to the National Regulatory Authorities; and
- Preparation of an application for CEF funding for remaining phases of the project.

The current phase of the project is now nearing its conclusion and preparation is underway for the commencement of the Detailed Design, EPC Procurement and Consenting Workstreams, which will be key components of the next phase. The submission of formal consenting applications in both jurisdictions is planned for the second half of 2020, with overall consent expected to be achieved before the end of 2021. The Construction Phase is expected to start in 2022 with practical completion in 2025 and the interconnector would be operational in early 2026. The overall joint EirGrid and RTE project roadmap is shown below in Figure 5.

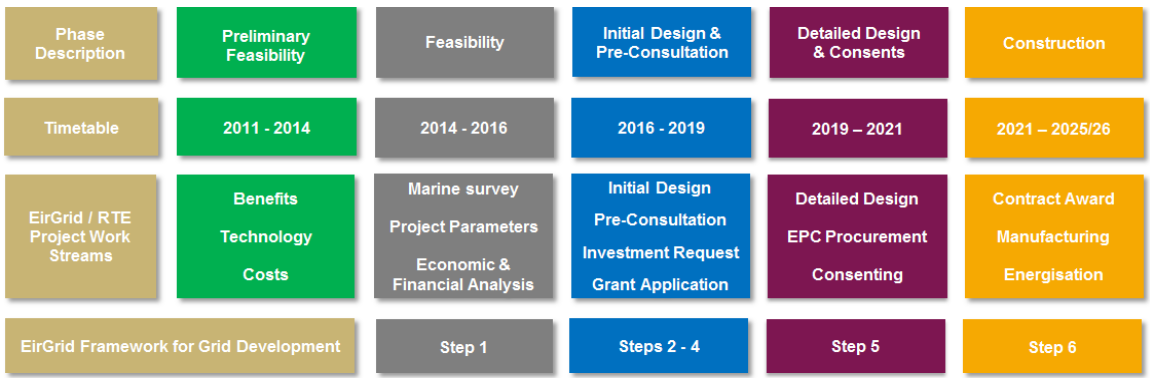


Figure 5 - Celtic Interconnector Project Roadmap

[5] https://www.cru.ie/wp-content/uploads/2018/12/CRU18265a-Celtic-Investment-Request.pdf

For the development of the project specifically in Ireland EirGrid is following its six-step Framework for Grid Development. The timeline for each of the steps is shown in further detail in Figure 6 below.

Figure 6 - Timeline of Framework for Grid Development Steps - Celtic Interconnector Project

Several studies have been undertaken as part of the initial steps of the project to confirm the availability of feasible offshore and onshore routes between Ireland and France for the installation of a HVDC interconnector. These studies, which are outlined in further detail in the following sections, were carried out following the initial identification of connection points in Ireland and France that had the potential to accommodate the import and export of 700MW between both countries.

Connection Point

Analysis of the capability of the Irish and French transmission systems to accommodate the expected power flows from the Celtic Interconnector found that both systems can reasonably accommodate the expected flows.

For the Irish side of the project, EirGrid undertook a study to identify feasible connection points on the Irish transmission grid which were capable of accommodating the export and import of 700 MW of power to and from France. The study identified:

- The Knockraha substation (East Cork), and
- The Great Island substation (West Wexford).

These points were selected based on their strong connectivity in the Irish transmission grid and their location along the south coast of Ireland, as shown in Figure 7 overleaf.

Further analysis of these two connection points showed that the Knockraha connection point could accommodate the additional power flows associated with the interconnector significantly better than the Great Island connection point[6].

[6] http://www.eirgridgroup.com/site-files/library/EirGrid/Celtic-Interconnector-Feasibility-Phase-Network-Analysis.pdf

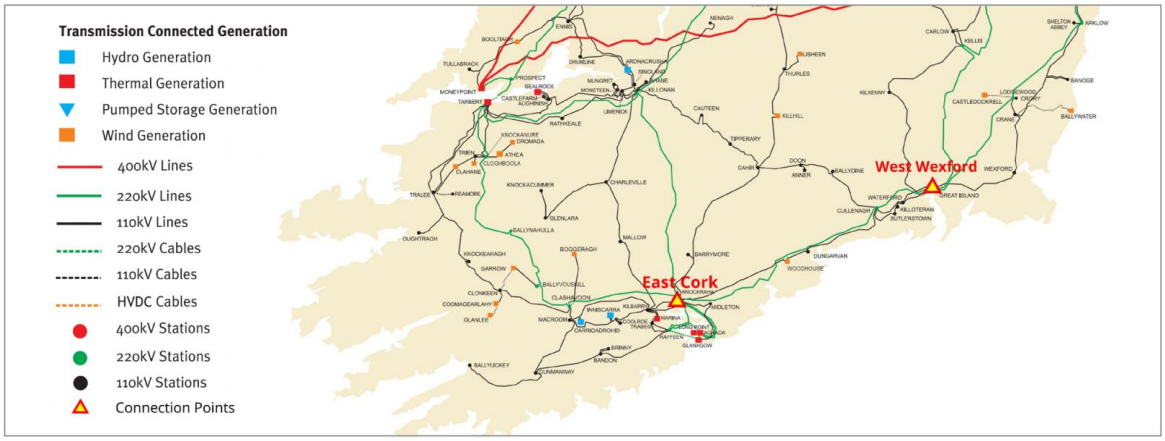


Figure 7 - Connection points identified in Ireland

Landfall Point

Following the identification of feasible connection points EirGrid undertook studies to identify feasible landfall points in both East Cork and West Wexford where an interconnector could be brought ashore. The study[7] identified five landfall points in each East Cork and West Wexford, as shown below in Figure 8 below, and which concluded that all ten locations were feasible with the landfalls in the East Cork study area performing better than those in the West Wexford study area.

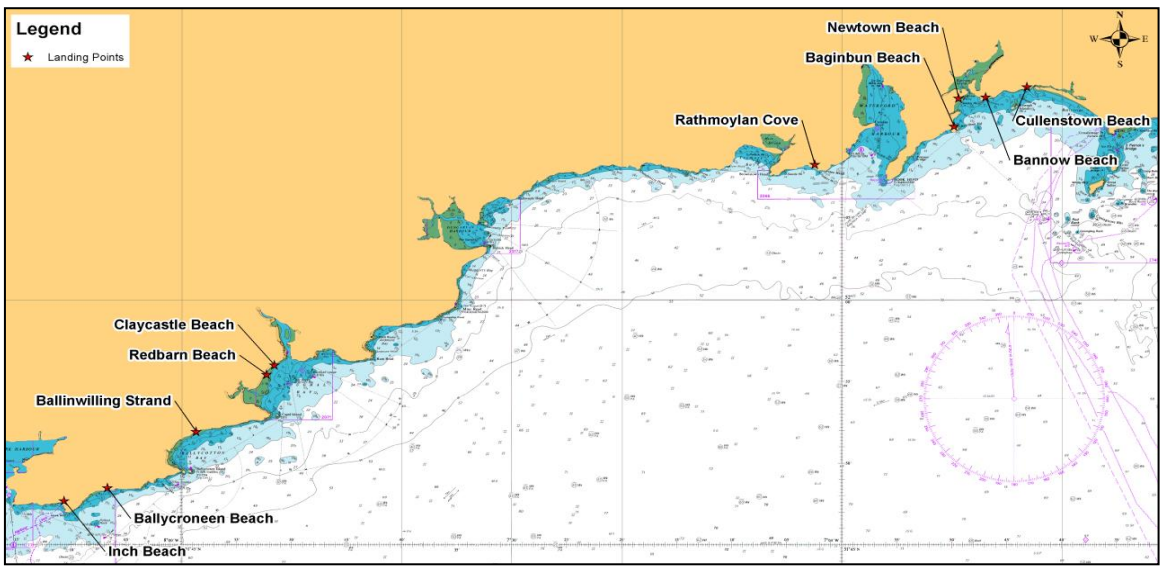


Figure 8 - Landfall points identified in East Cork and West Wexford

Marine Route

A desktop route investigation study[8] was carried out to identify potential marine routes between the south coast of Ireland and the North West coast of France. The study considered factors including the shortest reasonable route and potential engineering and environmental constraints. Six feasible offshore marine route options were identified as shown in Figure 9 overleaf.

[7] http://www.eirgridgroup.com/site-files/library/EirGrid/Celtic-Interconnector-Land-Study-Report-2.pdf
[8] http://www.eirgridgroup.com/site-files/library/EirGrid/Celtic-Interconnector-Marine-Route-Investigation.pdf

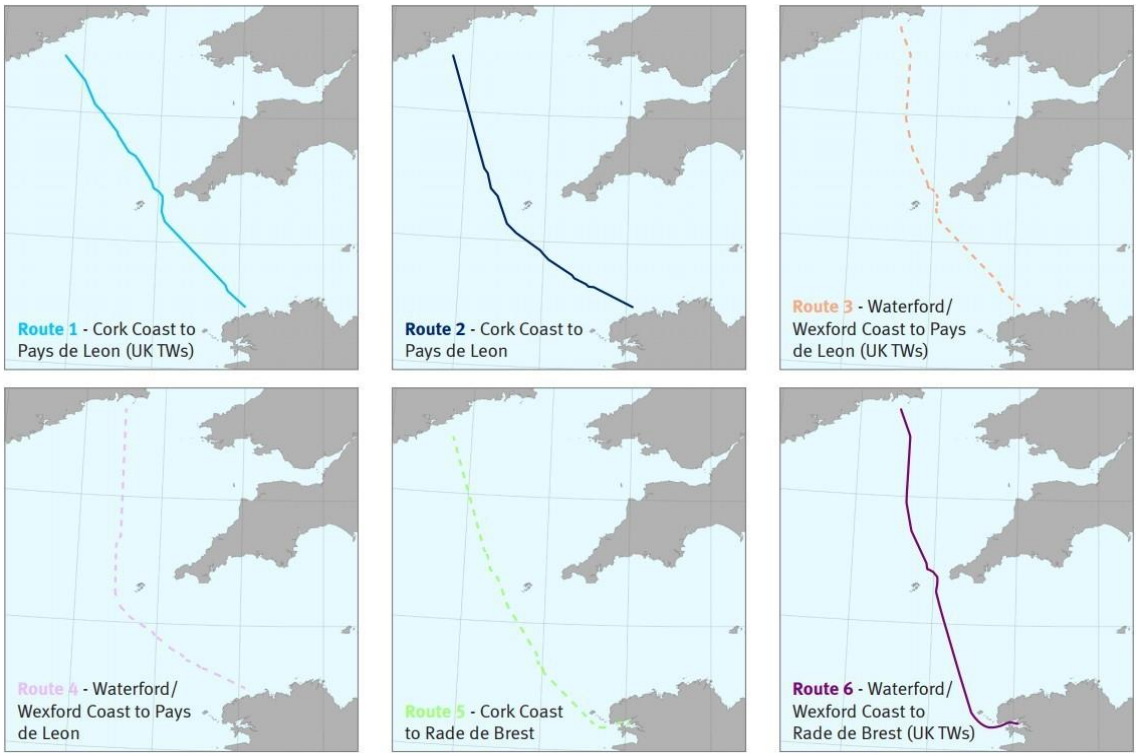


Figure 9 – Feasible offshore marine routes identified

Following a detailed constraints analysis a route alignment was selected which, although not the shortest route option, was considered the best performing route. Route 2 from East Cork, as shown in further detail in Figure 10 overleaf, avoids more technical and environmental constraints when compared to other routes and also avoids UK territorial waters, which would introduce unnecessary additional consenting to the project and enduring cost to the project.

A detailed marine survey of the best performing offshore route along with nearshore approach routes into two East Cork landfall points (Ballycroneen Beach and Ballinwilling Strand) was undertaken, in 2014 and 2015, in order to:

- Develop the offshore and nearshore routes,
- Assess seabed conditions and any technical constraints associated with cable laying, and
- Provide a robust basis for cost estimation.

The marine survey concluded that the offshore route was feasible with no major constraints identified and largely favourable water depths of between 100 and 110 metres pertain for the majority of the route. The marine survey identified challenging areas of geology on the nearshore approach routes in Ireland and therefore additional nearshore marine surveys were undertaken in 2017 and 2018 to investigate alternative approaches into Ballinwilling Strand and also to Redbarn and Claycastle Beaches.

The marine surveys were complemented by shipping, fishing and burial assessment studies to identify the density of maritime traffic along the cable route and determine the optimal burial depth for the cable beneath the seabed. These studies used the results of all of the previous marine studies along with evaluation of the risk using risk based quantification for the entire route.

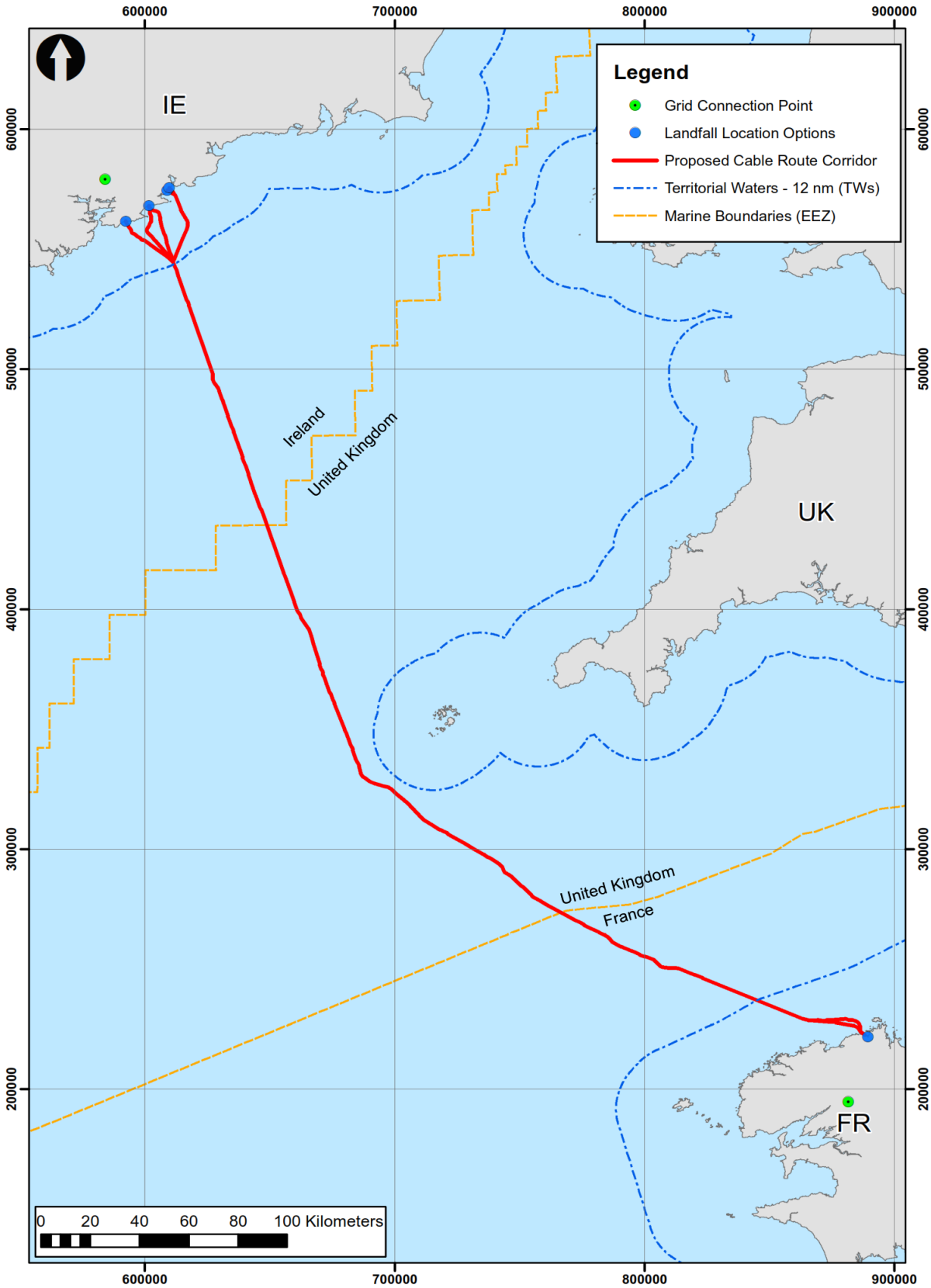


Figure 10 - Celtic Interconnector Marine Route Map

Figure 10 above gives an overview of the entire offshore route, and also shows the nearshore approach route options which are currently being considered into the Irish coast for each of the landfall points that have been identified.

Converter Station and Onshore Route

Onshore investigations considering technical, environmental and planning constraints have concluded that there are a number of feasible options for the onshore elements of the interconnector in France and Ireland. EirGrid is in the process of further developing and refining these options to identify the best performing option for each project element in Ireland with project stakeholders being consulted throughout the development process.

In Ireland, a high-level project scoping study[9] including a high-level environmental appraisal of the converter station, onshore routing and landfall point options was carried out during the Feasibility Phase of the project.

The report concluded that there were a number of feasible AC and DC circuit routes for each of the project elements in both the East Cork and West Wexford study areas, and provided an outline design of a proposed converter station and the identification of feasible converter station location areas and associated constraints analysis.

The land circuit and the submarine circuit will connect at an underground transition joint. This will be installed behind the beach where the submarine circuit comes ashore. The landfall point will be fully re-instated following completion of the works. The circuit between the converter station and the landfall point will be by underground cable installed in ducts typically under the road network, which will be fully re-instated. The total length of this circuit is expected to be between 30 – 40 km.

Project Development Summary

During Step 2 of the project EirGrid published detailed reports carried out on the project during the Feasibility Phase and the main findings as follows:

- Connection Point – *best performing location in East Cork*
- Marine Route – *best performing route from East Cork*
- Landfall Point – *East Cork performed better than West Wexford*

Following a consultation with stakeholders during the second half of 2017, the Knockraha substation in East Cork was confirmed as the preferred connection point in Ireland for the Celtic Interconnector along with a short list of five landfall points in East Cork. EirGrid announced this in February 2018 at the launch of Step 3 of the project. Therefore, the Celtic Interconnector will connect into the Irish transmission system at the existing Knockraha substation in East Cork and into the French transmission system at the existing La Martyre substation in Brittany.

During Step 3 the locations of the various project elements, as shown in Figure 11 overleaf, are being further developed with the aim of refining the options and providing an optimal solution that considers social, environmental, technical and economic factors.

[9] http://www.eirgridgroup.com/site-files/library/EirGrid/PE424-F0000-R000-038-001.pdf

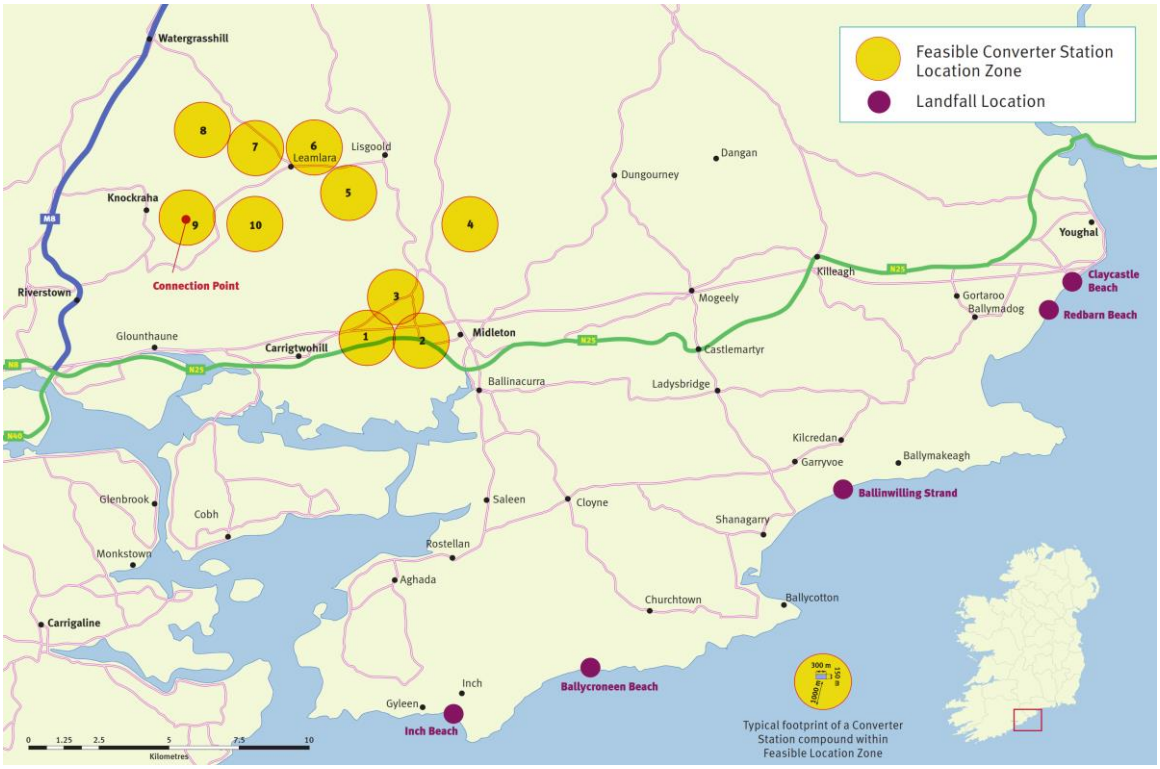


Figure 11 - Onshore element project options in Ireland

As of December 2018, EirGrid is nearing completion of a detailed constraints assessment of the study area for the converter station locations taking account of a wide range of constraints. This follows a period of consultation and engagement events with project stakeholders on the range of options.

Once the constraints assessments have been completed EirGrid will carry out a shortlisting process, by way of an enhanced performance matrix, in order to determine the most feasible converter station location options to bring forward to the next step of the project's development.

With regard to the current shortlist of landfall point options, EirGrid is currently completing its analysis of the marine survey data from the suite of marine surveys undertaken and associated onshore constraints assessment and is in the process of shortlisting the options for the landfall point and associated nearshore approach route, by way of an enhanced performance matrix.

In early 2019, EirGrid plans to confirm the preferred options and carry out public consultation. Feedback received from stakeholders in response to the consultation will inform the decision to confirm a final short list of both landfall points and converter station location zones before commencing Step 4.

In Step 4, which will be carried out during 2019, the short listed options will be studied in further detail in order to determine the preferred solution for where each element of the interconnector should be located. Following this the project will enter Step 5 in 2020 which involves making formal applications for each of the required project consents as part of the planning process, which is expected to be completed by the end of 2021.

Social and Environmental Impact

For the onshore aspects of the project, high level social and environmental impact assessment baseline reports have been prepared examining issues like:

- The geographical setting,
- Environmental constraints, and
- Communities and amenities of the project study area.

Feasible options for each of the elements of the proposed project have been identified and given that the majority of the onshore circuit route would be installed underground and would follow the existing road network it can be reasonably concluded that the social impact would be minimal and restricted to the Construction Phase of the project. While further detailed social and environmental impact assessments are required and planned to be carried out during Step 4 in 2019, in advance of the formal consenting process in Ireland and France, assessments carried out at this stage do not foresee any major impacts from the proposed project.

For the offshore aspects of the project, a detailed benthic (environmental) investigation has been carried out as an integral part of the marine surveys. A large variance of habitats was encountered along the project's offshore route. However, no evidence of any particularly sensitive habitats was identified. The investigations that were carried out and the samples recovered provided an excellent quality basis for the offshore environmental impact assessment which will be carried out in parallel with the onshore assessment. Engagement with fisheries interests in both Ireland and France has been a feature of this stage and this will continue throughout the project to ensure minimal impact on these and other marine users.

The elements of the project within France are subject to a mandatory requirement for Environmental Impact Assessment (EIA) according to the *'Code de l'environnement'* as follows:

- *'Construction of a substation or extension of a substation (if the surface of the substation is increased)'*. The construction of a new converter station and the extension to the substation at La Martyre therefore both require EIA.
- *'Construction of an underground cable longer than 15km and a voltage higher than 225 kV'*. As the French onshore HVDC cable route is greater than 15km long and the subsea cable route is greater than 15km in French waters, both the land and subsea cables also require EIA.

Recognising the requirements for EIA in France, as noted above, and in the interests of consistency across the project EirGrid intends to submit a voluntary Environmental Impact Assessment Report (EIAR). This would involve submission of an EIAR to An Bord Pleanála covering the onshore elements under the Planning and Development (Strategic Infrastructure) Act 2006 and to the Department of Housing, Planning and Local Government covering the marine elements under the Foreshore Act 1933 (as amended).

Environmental Designations

Within the wider study area for the converter station, landfall points and circuit routes in Ireland there are a range of designated environmental sites which are protected by national and European legislation. These sites are described in Table 7 Environmental Designations Onshore and Table 8 Environmental Designations Offshore. It should be noted that some sites are both onshore and offshore and have been included in both tables for completeness.

Table 7 - Environmental Designations Onshore

Type	Name	Reason for Designation
Special Area of Conservation and proposed National Heritage Area	Great Island Channel	Annex I habitats that are a primary reason for selection of this site: Estuaries Mudflats and sandflats not covered by seawater at low tide Perennial vegetation of stony banks Salicornia and other annuals colonizing mud and sand Atlantic salt meadows (Glauco-Puccinellietalia maritimae) Otter (Lutra lutra) Mediterranean salt meadows (Juncetalia maritimi) Killarney fern (Trichomanes speciosum) Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation Old sessile oak woods with Ilex and Blechnum in Islands of the North Atlantic Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) Taxus baccata woods of the Islands of the North Atlantic Annex II species that are a primary reason for selection of this site: Freshwater pearl mussel (Margaritifera margaritifera), White-clawed crayfish (Austropotamobius pallipes), Sea lamprey (Petromyzon marinus), Brook lamprey (Lampetra planeri), River lamprey (Lampetra fluviatilis), Allis shad (Alosa alosa), Twaite shad (Alosa fallax fallax), Salmon (Salmo salar)
Special Protection Area	Cork Harbour	Cork Harbour is a large, sheltered bay system, which stretches from the two main estuaries of the River Lee, near Cork City in the northwest, and the Owenacurra River, near Midleton, in the northeast, southwards as far as Roches Point. It is a complex site and encompasses many other estuaries and inlets Owing to the sheltered conditions, the intertidal flats are often muddy in character but described principally as 'mixed sediment to sandy mud with polychaetes and oligochaetes' (NPWS, 2014a). These muds support a range of macro-invertebrates, notably Macoma balthica, Scrobicularia plana, Peringia (Hydrobia) ulvae, Nepthys hombergi, Nereis diversicolor and Corophium volutator. Green algae are a common occurrence on the mudflats while Common Cordgrass (Spartina spp.) has colonised the intertidal flats in places, and is particularly prevalent at Rossleague and Belvelly in the North Channel. Salt marshes are scattered through the site and these provide high tide roosts for waterbirds. Cork Harbour is an internationally important wetland site, regularly supporting in excess of 20,000 wintering waterfowl, for which it is amongst the top ten sites in the country. Of particular note is that the site supports internationally important populations of Black-tailed Godwit and Redshank, while a further 20 non-breeding waterbird species occur in numbers of national importance. The Annex I species Common Tern has a breeding population at the site.
Geological Heritage Site	Baneshane Quarry	The bedrock is limestone with karst features. A spring and a cave are located within the townland of Water Rock. According to the Geological Survey of Ireland data, the spring is 'apparently fed by castle rock stream sink,' and the cave has three openings in the north face of the limestone crag. The most easterly cave has a stream permanently flowing into it. Water enters the other two caves at times of high flow. Fluvial cobbles and pebbles are found on the cave floor.
Proposed National Heritage Area	Leamlara Woods	Woodland
Special Area of Conservation	Blackwater River	Annex I habitats that are a primary reason for selection of this site: Estuaries Mudflats and sandflats not covered by seawater at low tide Perennial vegetation of stony banks Salicornia and other annuals colonizing mud and sand Atlantic salt meadows (Glauco-Puccinellietalia maritimae) Otter (Lutra lutra) Mediterranean salt meadows (Juncetalia maritimi) Killarney fern (Trichomanes speciosum) Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation Old sessile oak woods with Ilex and Blechnum in Islands of the North Atlantic Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) Taxus baccata woods of the Islands of the North Atlantic Annex II species that are a

Type	Name	Reason for Designation
		primary reason for selection of this site: Freshwater pearl mussel (Margaritifera margaritifera), White-clawed crayfish (Austropotamobius pallipes), Sea lamprey (Petromyzon marinus), Brook lamprey (Lampetra planeri), River lamprey (Lampetra fluviatilis), Allis shad (Alosa alosa), Twaite shad (Alosa fallax fallax), Salmon (Salmo salar)
Special Area of Conservation	Ballymacoda (Clonpriest and Phillmore)	This coastal site stretches north-east from Ballymacoda to within about 6 km of Youghal, Co. Cork. Though moderate in size, it has a good diversity of coastal habitats, including several listed on Annex I of the E.U. Habitats Directive. The site is a Special Area of Conservation (SAC) selected for the following habitats and/or species listed on Annex I / II of the E.U. Habitats Directive-Estuaries, Tidal Mudflats and Sandflats, Salicornia Mud Atlantic Salt Meadows, Mediterranean salt meadows (Juncetalia maritime).
Special Protection Area and RAMSAR site	Ballycotton Bay	Supporting European important populations of Annex II listed species: Bar-tailed Godwit (Limosa lapponica) Golden Plover (Pluvialis apricaria) Supporting nationally important wintering populations of 9 bird species: Teal (Anas crecca), Ringed Plover (Charadrius hiaticula), Golden Plover (Pluvialis apricaria), Grey Plover (Pluvialis squatarola), Lapwing (Vanellus vanellus), Black-tailed Godwit (Limosa limosa), Bar-tailed Godwit (Limosa lapponica), Curlew (Numenius arquata), Turnstone (Arenaria interpres), Common Gull (Larus canus) and Lesser Black-backed Gull (Larus fuscus). Internationally important wetland
Proposed National Heritage Area	Ballycotton, Ballynamona and Shanagarry	This is a composite coastal site stretching northwards from Ballycotton towards Garryvoe. The site is important for its wetlands, which have, however, been damaged by drainage, land reclamation and a breach in the shingle bar in recent years. Wetlands on the site include reedswamp with Common Reed (Phragmites australis) and marshes near Garryvoe with Greater Pond-sedge (Carex riparia), Water Dock (Rumex hydrolapathum) and Pink Water-speedwell (Veronica catenata), amongst others. The shingle beach on the site is mobile and is influenced by storms, which create open conditions that favour a particular suite of species. Species found here include Grass-leaved Orache (Atriplex littoralis), Black Mustard (Brassica nigra), Sea Radish (Raphanus raphanistrum subsp. maritimum), Sand Couch (Elymus farctus) and Lyme-grass (Leymus arenarius). Also growing on the shingle beach is Sea-kale (Crambe maritima), a rare species listed in the Red Data Book. The site is also of ornithological importance. It contains nationally important numbers of waterfowl, including. Bewick's Swan, Gadwall, Shoveler, Coot, Ringed Plover, Grey Plover, Sanderling and Turnstone. The site is also notable for its use by rare migrant species. Reed Warblers, rare in Ireland, breed in the Common Reed beds.
Proposed National Heritage Area	Capel Island and Knockadoon Head	The site is of importance for its migrant birds which has included a number of rare migrants, including Pied Wheatear and Sardinian Warble. Scarce migrants have included Hoopoe, Lapland Bunting, Yellow-browed Warbler, Pied Flycatcher, Black Redstart (the latter occasionally in large numbers). The island hosts Chough, Peregrine and a colony of Cormorants
Proposed National Heritage Area	Ballyvergan Marsh	The marsh is of particular importance as it is the largest freshwater coastal marsh in County Cork, and accommodates important plant and bird species.

Table 8 - Environmental Designations Offshore

Type	Name	Reason for Designation
Special Area of Conservation	Blackwater River	Annex I habitats that are a primary reason for selection of this site: Estuaries Mudflats and sandflats not covered by seawater at low tide Perennial vegetation of stony banks Salicornia and other annuals colonizing mud and sand Atlantic salt meadows (Glauco-Puccinellietalia maritimae) Otter (Lutra lutra) Mediterranean salt meadows (Juncetalia maritimi) Killarney fern (Trichomanes speciosum) Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation Old sessile oak woods with Ilex and Blechnum in Islands of the North Atlantic Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) Taxus baccata woods of the Islands of the North Atlantic Annex II species that are a primary reason for selection of this site: Freshwater pearl mussel (Margaritifera margaritifera), White-clawed crayfish (Austropotamobius pallipes), Sea lamprey (Petromyzon marinus), Brook lamprey (Lampetra planeri), River lamprey (Lampetra fluviatilis), Allis shad (Alosa alosa), Twaite shad (Alosa fallax fallax), Salmon (Salmo salar)
Special Protection Area and RAMSAR site	Blackwater Estuary	Supporting important winter populations of Annex II listed species: Black-tailed Godwit (Limosa limosa) Curlew (Numenius arquata) Supporting nationally important wintering populations of 6 bird species: Wigeon (Anas penelope), Golden Plover (Pluvialis apricaria), Lapwing (Vanellus vanellus), Dunlin (Calidris alpina), Bar-tailed Godwit (Limosa lapponica), Redshank (Tringa totanus) Internationally important wetland of conservation importance for overwintering bird species.
Proposed National Heritage Area	Blackwater River and Estuary	Riparian vegetation, marshes and reedbeds and dry woodlands and nationally important wintering bird species
Special Protection Area and RAMSAR site	Ballymacoda Bay	Supporting important European populations of Annex II listed species: Black-tailed Godwit (Limosa limosa) Regularly supporting at least 20,000 waterfowl: Overwinter, the area regularly supports 22,000 individual waterfowl. Supporting nationally important wintering populations of 15 bird species Internationally important wetland
Special Protection Area and RAMSAR site	Ballycotton Bay	Supporting European important populations of Annex II listed species: Bar-tailed Godwit (Limosa lapponica) Golden Plover (Pluvialis apricaria) Supporting nationally important wintering populations of 9 bird species: Teal (Anas crecca), Ringed Plover (Charadrius hiaticula), Golden Plover (Pluvialis apricaria), Grey Plover (Pluvialis squatarola), Lapwing (Vanellus vanellus), Black-tailed Godwit (Limosa limosa), Bar-tailed Godwit (Limosa lapponica), Curlew (Numenius arquata), Turnstone (Arenaria interpres), Common Gull (Larus canus) and Lesser Black-backed Gull (Larus fuscus). Internationally important wetland
Special Area of Conservation and Proposed National Heritage Area	Ballymacoda (Clonpriest and Phillmore)	Estuaries Mudflats and sandflats not covered by seawater at low tide Salicornia and other annuals colonizing mud and sand Atlantic salt meadows (Glauco-Puccinellietalia maritimae)
Proposed National Heritage Area	Ballycotton, Ballynamona and Shanagarry	Coastal vegetation and bird species
Proposed National Heritage Area	Capel Island and Knockadoon Head	Coastal vegetated cliffs. Capel Island is important for nesting Cormorants, gulls, fulmar and black guillemot
Proposed National Heritage Area	Ballyvergan Marsh	Coastal sand & clay cliffs and fresh water marsh Supports a diversity of bird species including Annex I Species - Hen Harrier Important as a pre-migration stop-over point for various passerine species on their way to wintering grounds further south and as a breeding site for Reed Warbler.
Geological Heritage Area	Ballycroneen Bay Geological Heritage Area	Ballycroneen Bay designated for its widely occurring till deposited by the Irish Sea glacier.

Key Milestones and Implementation Plan

The Celtic Interconnector has already achieved and is aiming at a number of key milestones, progressing towards a Final Investment Decision (FID) in 2021 with a target to commence trial operations in 2026. Table 9 below outlines the key milestones achieved to date and those planned in future.

Table 9 - Key Project Milestones

Milestone	Status	Date	Comment
ENTSO-E TYNDP Listing	In place	2012	The Celtic Interconnector was recognised as an important project of pan European significance in ENTSO-E's 2012 Ten Year Network Development Plan (TYNDP) and has retained this listing during each 2 year review.
Project of Common Interest (PCI) Status	In place	2013	The Celtic Interconnector was included in the first Union List of PCIs under the TEN-E Regulation in 2013 and has remained on the list since.
e-Highway 2050 Status	In Place	2015	The Celtic Interconnector was designated as an Electrical Highway under the EU supported e-Highway 2050 project. This identifies the project as part of developments on the European grid needed to meet the EU's 2050 low carbon economy goals.
Project Feasibility Confirmed	Complete	2014 - 2016	The Feasibility Phase of the project was completed with approval from both Irish and French governments to proceed to next phase of the project.
Marine Surveys Completed	Complete	2014 - 2018	Extensive geophysical, geotechnical, unexploded ordnance and benthic surveys completed across entire offshore route and for a number of nearshore approach route options.
Submission of Investment Request	Complete	2018	EirGrid and RTE submitted a joint investment request to the National Regulatory Authorities under Article 12 of the TEN-E Regulation which included a detailed cost-benefit analysis of the project.
Submission of Grant Application	Expected	2019	EirGrid and RTE intend to submit an EU grant application to the Connecting Europe Facility to support the detailed design and construction of the project.
Submission of Consents Applications	Expected	2020	The submission of formal consenting applications in both jurisdictions is planned for the second half of 2020.
PCI Comprehensive Decision	Expected	2021	The PCI Comprehensive Decision is expected to be achieved before the end of 2021.
Final Investment Decision	Expected	2021	The Final Investment Decision on the project is expected to be made once all necessary milestones have been achieved.
Commence Trial Operations	Expected	2026	The Celtic Interconnector is expected to be under construction from 2022 – 2025 and to commence trial operations in 2026.

A high level indicative project timeline is provided in Figure 12 overleaf which includes the key consenting activities planned for the Celtic Interconnector project.

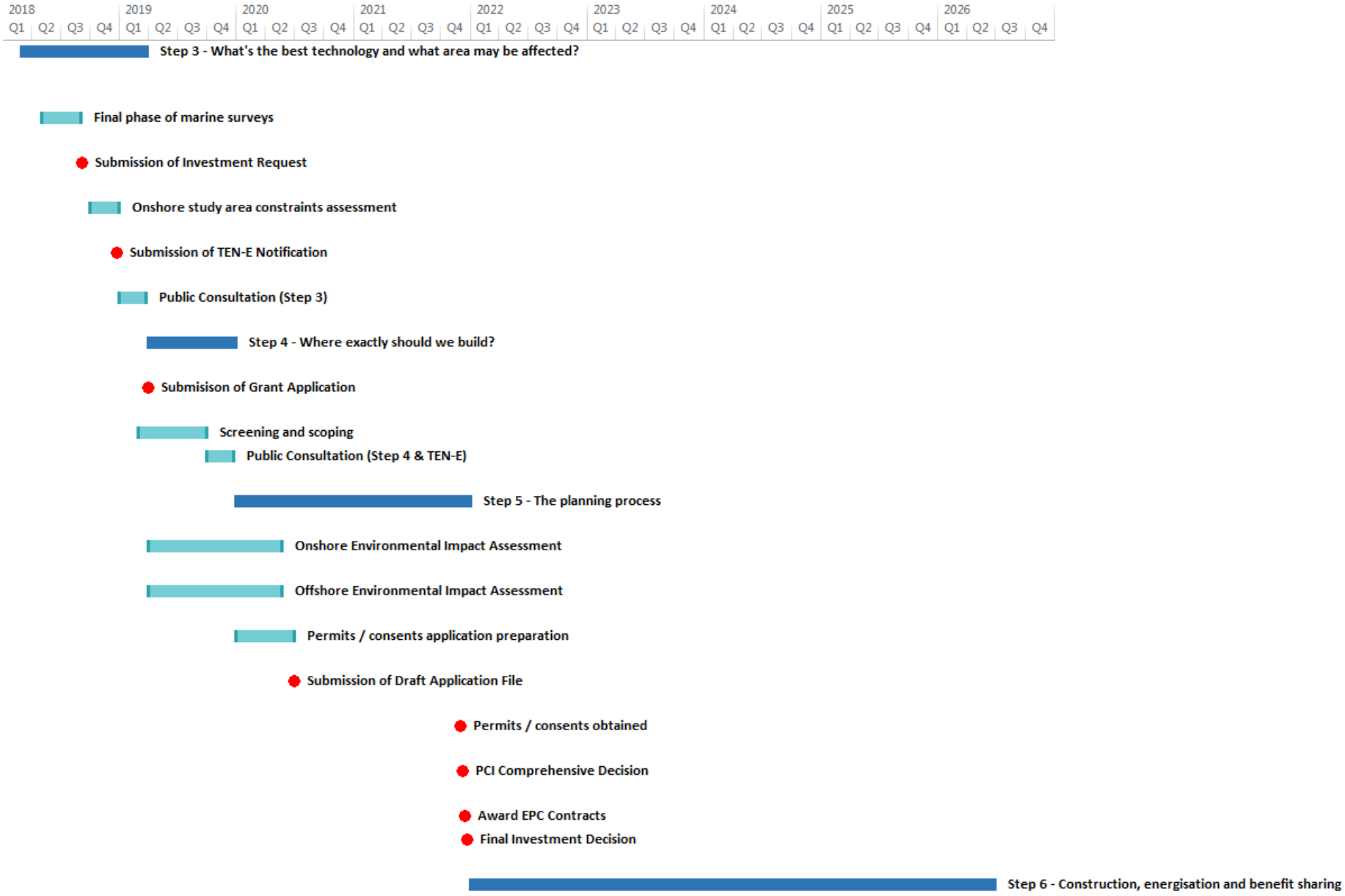


Figure 12 - Indicative project timeline

Appendix D: Confirmation from the Irish CA that the requirements of Article 10(4)(a) of the TEN-E Regulation are satisfied

From: Diarmuid Collins <D.Collins@pleanala.ie>
Sent: 29 March 2021 16:00
To: Brennan, Valerie (EXT)
Cc: Cox, Des
Subject: Celtic Interconnector Project
Attachments: CRU letter 23 March 2021.pdf; Dept AFM Response to ABP Re PCI 1.6 Celtic Interconnector Project 14012021.pdf; ABP (SID) Document.docx

Good Afternoon Valerie,

I refer to the scoping proposal submitted by EirGrid, under Article 10.4. (a) of Regulation (EU) No. 347/2013 in relation to the scope of material and level of detail of information to be submitted as part of the application file. I attach a copy of correspondence dated 23rd March, 2021 received from the CRU in response to your letter and appendices of 12th March. With the circulation of this letter to you, you have now received copies of all the replies received from other authorities concerned. These replies were from: CRU, An Bord Pleanála(SID) and the Dept AFM. It should be noted that not all authorities concerned replied. Having regard to the content of the responses, An Bord Pleanála (Competent Authority) acting in close co-operation with the other authorities concerned informs you that the scope of material and level of detail of information proposed is acceptable and satisfies the requirements of the Article.

In relation to Article 10. 4 (b) and the detailed schedule for the permit granting process, which is to be drawn up in close co-operation with you and the other authorities concerned, I refer to the information submitted by you on 18th March. Your Proposed Schedule relating to the National process refers on page 5 to the structure of the document and the document addresses the consents required for SID, Foreshore and CRU consenting. Apart from listing other consents required in Table 1.2, I do not see any details for those consents, which should be in in line with the guidelines set out in Annex V1(2) to the Regulation. Also, in relation to Table 1.2, your letter of 27th November, 2020 which gave an updated list of possible consents required referred on page 4 to a Ministerial consent in relation to the 1982 UN Convention on the Law of the Sea. That consent is not listed in the Table. Please address the matter of detail for all consents required and clarify the position in relation to a possible consent concerning the UN Convention on the Law of the Sea.

When the above matters have been addressed we, as Competent Authority, will be able to further progress the detailed schedule for the permit granting process in close co-operation with the authorities concerned.

In your email of 26th March, Eirgrid stated that it is ready to submit the DAF. Please refer to page 24 of the Manual of Permit Granting Process Procedures for a flowchart of the Pre-Application Procedure Overview in this regard. Pending finalisation of the detailed schedule for the permit granting process, any submission of the draft application file would be pre-mature.

Regards,
Diarmuid Collins,
PCI Unit.

Diarmuid Collins
Senior Administrative Officer
Management Committee
An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902
Teil: 01-8737256
Facs: 01-8722684

Appendix E: Confirmation from the Irish CA that the requirements of Article 10(4) of the TEN-E Regulation are complete

From: Diarmuid Collins <D.Collins@pleanala.ie>
Sent: 22 April 2021 15:46
To: Brennan, Valerie (EXT)
Cc: Cox, Des
Subject: Celtic Interconnector Project
Attachments: CRU response dated 20 April, 2021.pdf; Foreshore Unit response.pdf; An Bord Pleanála (SID) response.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Good Afternoon Valerie,

I refer to your email dated 18th March, 2021 and email of 16th April, 2021 enclosing a proposed schedule for the permit granting process. As Competent Authority we have been in contact with the other authorities concerned to ensure close co-operation in drawing up the schedule. For your information, I attach the responses received from those authorities: CRU, Foreshore Unit and An Bord Pleanála (SID).

In relation indicative timelines, as Competent Authority, we note that Table 2.1:TEN-E Regulation Progress to Date and Indicative Timelines, as updated by your email of 16th April 2021, provides for the DAF being submitted to the Irish Competent Authority in April 2021, any "additional" information that is required having an indicative timeline of June 2021 and the acceptance of the submitted application file having an indicative timeline of June 2021. If we understand those indicative timelines as intending the process of the DAF being submitted, examined by the other authorities concerned for any missing information, any missing information being submitted, and any missing information being checked all being completed within that period, we are of the view that the project promoter may not be allowing enough time for that process. However, we note that the schedule is to be in line with the guidelines set out in Annex VI which refers to the deadlines being seen in the view of the comprehensive decision to be taken.

As Competent Authority we consider that the proposed schedule submitted by you, taken with the responses from the other authorities concerned and our comment on any possible missing information process completes the requirements of Article 10.4 of the Regulation in relation to the schedule.

We will shortly be in contact with you in relation to the joint schedule, referred to in Article 10.4 which will endeavour to align the timetables of the competent authorities of the Member States.

Regards,

Diarmuid Collins,
PCI Unit.

Diarmuid Collins
Senior Administrative Officer
Procurment Internal Audit & PCI
An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902
Teil: 01-8737256
Facs: 01-8722684

Appendix F: Invitation from the Irish CA to submit Draft Application File

From: Diarmuid Collins <D.Collins@pleanala.ie>
Sent: 28 April 2021 14:13
To: Brennan, Valerie (EXT)
Cc: Cox, Des; Nichola Meehan
Subject: Celtic Interconnector Project

Good Afternoon Valerie,

I refer to my email of 22nd April. An Bord Pleanála, as competent authority under Article 10. 4 of Regulation (EU) 347/2013, has been in contact with the French competent authority in relation to the joint schedule in which we shall endeavour to align our timetables. We have also been in contact with the UK competent authority. Following those contacts, we now regard the permit granting process for this project to have reached the stage where you as project promoter may wish to proceed to submit the draft application file.

Regards,
Diarmuid Collins,
PCI Unit.

From: Diarmuid Collins
Sent: Thursday 22 April 2021 15:46
To: Valerie.Brennan@Eirgrid.com
Cc: Des Cox (Des.Cox@Eirgrid.com) <des.cox@eirgrid.com>
Subject: Celtic Interconnector Project

Good Afternoon Valerie,

I refer to your email dated 18th March, 2021 and email of 16th April, 2021 enclosing a proposed schedule for the permit granting process. As Competent Authority we have been in contact with the other authorities concerned to ensure close co-operation in drawing up the schedule. For your information, I attach the responses received from those authorities: CRU, Foreshore Unit and An Bord Pleanála (SID).

In relation indicative timelines, as Competent Authority, we note that Table 2.1:TEN-E Regulation Progress to Date and Indicative Timelines, as updated by your email of 16th April 2021, provides for the DAF being submitted to the Irish Competent Authority in April 2021, any ”additional” information that is required having an indicative timeline of June 2021 and the acceptance of the submitted application

file having an indicative timeline of June 2021. If we understand those indicative timelines as intending the process of the DAF being submitted, examined by the other authorities concerned for any missing information, any missing information being submitted, and any missing information being checked all being completed within that period, we are of the view that the project promoter may not be allowing enough time for that process. However, we note that the schedule is to be in line with the guidelines set out in Annex VI which refers to the deadlines being seen in the view of the comprehensive decision to be taken.

As Competent Authority we consider that the proposed schedule submitted by you, taken with the responses from the other authorities concerned and our comment on any possible missing information process completes the requirements of Article 10.4 of the Regulation in relation to the schedule.

We will shortly be in contact with you in relation to the joint schedule, referred to in Article 10.4 which will endeavour to align the timetables of the competent authorities of the Member States.

Regards,
Diarmuid Collins,
PCI Unit.

Diarmuid Collins
Senior Administrative Officer
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Appendix G: Letter from Irish CA confirming that no missing information is being sought in accordance with Article 10 of the TEN-E Regulation

An Bord Pleanála

Mr. Des Cox
Consents and Planning Lead
EirGrid,
The Oval,
160 Shelbourne Road,
Ballsbridge,
Dublin D04 FW28.

Date: 22nd June, 2021

Re: Celtic Interconnector Project (PCI Number 1.6)

Dear Mr. Cox,

I refer to the draft application file (DAF) submitted by Eirgrid on 29th April, 2021 under Article 10 of Regulation (EU) No 347/2013.

The DAF was circulated for examination for any missing information. Responses have been received and are attached as follows:

- Foreshore Unit (Department of Housing, Local Government and Heritage),
- Strategic Infrastructure Division (An Bord Pleanála), and
- Commission for Regulation of Utilities (2 letters).

Please note that the statement on page 2 of the letter relating to consent under section 48 and 49 of the Electricity Regulation Act, 1999 has been clarified by the CRU that it is not intended as a request for missing information to be supplied under Article 10 of EU Regulations 347/2013.

As no missing information is being sought under Article 10, subject to you submitting a hard copy and a soft copy of the DAF to us, the pre-application procedure will close.

The statutory permit granting procedure, which covers the period of the date of acceptance of the submitted application file until the comprehensive decision is taken, shall commence on the date we, as PCI unit, acknowledge acceptance of the hard copy application file.

Yours Sincerely,

Nichola Meehan
Executive Officer

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Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
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