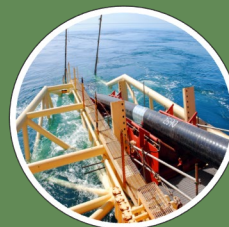


GREENLINK MARINE ENVIRONMENTAL STATEMENT- WALES

APPENDIX A

Compliance with Draft Welsh National Marine Plan

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Greenlink Interconnector
- connecting the power markets
in Ireland and Great Britain

Greenlink
INTERCONNECTOR



A.1 APPENDIX A - COMPLIANCE WITH DRAFT WELSH NATIONAL MARINE PLAN

The draft Welsh National Marine Plan (Welsh Government 2018b) contains thirteen objectives which will be delivered through 55 policies. The policies cover a wide range of topics including activities and users, economic, social and environmental considerations and cross-cutting issues such as the join up between decision-making on land and at sea and opportunities for coexistence. The key policies relevant to the Proposed Development and how the policy objectives have been addressed are presented in Table A-1 below.

Figure A-1 Compliance with Draft Welsh National Marine Plan

Policy Code	Policy	Applicable	Reasoning
Subsea Cabling			
CAB_01	Subsea Cabling (Supporting): Proposals that facilitate the growth of digital communications networks and/or the optimal distribution of electricity are encouraged.	✓	Greenlink will facilitate the optimal distribution of electricity providing significant interconnection between Ireland, the UK and mainland Europe. It will also provide additional transmission network capacities, reinforcing the existing electricity grids in south-east Ireland and south Wales.
CAB_02	Subsea Cabling (Safeguarding): Proposals potentially affecting existing and planned subsea cables and their landfall sites where a consent or authorisation or lease has been granted or formally applied for should not be authorised unless compatibility with the existing, authorised or proposed subsea cable activity can be satisfactorily demonstrated or there are exceptional circumstances. Compatibility should be achieved, in order of preference, through: a. Avoiding adverse impacts on those activities; and/or b. Minimising impacts where they cannot be avoided; and/or c. Mitigating impacts where they cannot be minimised. If adequate compatibility cannot be achieved, proposals should present a clear and convincing justification for proceeding.	✓	The Proposed Development crosses one live telecommunications cable in Welsh offshore waters. GIL is in discussion with the asset owner and will enter into a formal Crossing Agreement (see Chapter 14). GIL is aware that Bombora Wave Power are also considering using Freshwater West as a landfall. GIL and Bombora have developed a cooperative relationship to ensure compatibility of the two projects.
General cross-cutting policy			
GEN_01	Overarching planning policy: There is a presumption in favour of the sustainable development of the plan area in order to contribute to Wales' well-being goals.	✓	The development of Greenlink supports sustainable development and will help to reduce electricity prices in Wales.
GEN_02	Overarching planning policy: Relevant public authorities should take a proportionate, risk-based approach to application of relevant marine planning policies in decision making.	X	Not applicable

Policy Code	Policy	Applicable	Reasoning
ECON_01	Blue growth: Proposals for economically sustainable activities are encouraged.	✓	Greenlink will provide jobs and tax revenues to the Welsh economy.
ECON_02	Coexistence: Proposals that consider opportunities for coexistence with other compatible sectors are encouraged in order to optimise the value and use of the marine area and marine natural resources	✓	GIL considered other sea users within the decision-making process. Mitigation has been proposed to ensure co-existence is possible (Chapters 12-14).
SOC_01	Access to the marine environment: Proposals should maintain or enhance access to the marine environment.	✓	GIL considered how installation activities will affect access to the sea and mitigation will be in place to ensure access is maintained (Chapter 14).
SOC_02	Well-being of coastal communities: Proposals that contribute to the well-being of coastal communities are encouraged.	✓	Greenlink will contribute to the well-being of coastal communities by reducing the cost of energy supply.
SOC_03	Marine pollution incidents: Proposals should minimise their risk of marine pollution incidents.	✓	All Greenlink vessels will have control measures and shipboard oil pollution emergency plans (SOPEP) in place and will adhere to MARPOL Annex I requirements (see Embedded Mitigation, Chapter 4).
SOC_04	Welsh language and culture: Proposals that contribute to the promotion and facilitation of the use of the Welsh language and culture are encouraged.	X	Not applicable
SOC_05	Historic assets: Proposals should demonstrate how potential impacts on historic assets and their settings have been taken into consideration at an early stage.	✓	An archaeological expert (Cotswold Archaeology) was commissioned to undertake a Marine Archaeological Technical Report. This has been used to inform Chapter 15 and is provided as Technical Appendix G.
SOC_06	Designated landscapes: Proposals that demonstrate that they are compatible with the purposes and special qualities for which National Parks or Areas of Outstanding Natural Beauty have been designated are encouraged.	✓	An assessment of how the Greenlink will affect seascape and landscape has been assessed in Chapter 15.

Policy Code	Policy	Applicable	Reasoning
SOC_07	Seascapes: Proposals should demonstrate how potential impacts on seascapes have been taken into consideration at an early stage.		
SOC_08	Resilience to coastal change and flooding: Proposals should demonstrate how they are resilient to coastal change and flooding over their lifetime.	✓	The landfall will use horizontal directional drilling to ensure that the dune system at Freshwater West is not affected. Cable burial depth will be sufficient to ensure cables remain buried during coastal changes.
SOC_09	Effects on coastal change and flooding: Proposals are encouraged that: - demonstrate that they have no significant adverse impact upon coastal processes; - minimise the risk of coastal change and flooding; and - align with the relevant Shoreline Management Plan.	✓	An assessment of how the Greenlink will affect coastal processes and the Shoreline Management Plan is provided in Chapter 7.
SOC_10	Minimising climate change: Proposals should, in order of preference: - avoid the emission of greenhouse gases; and/or - minimise them where they cannot be avoided; and/or - mitigate them where they cannot be minimised. Where significant emission of greenhouse gases cannot be adequately addressed, proposals for regulated activities should present a clear and convincing justification for proceeding.	✓	Greenlink will not significantly contribute to climate change. Greenlink will help to reduce CO ₂ emissions and meet climate policy targets in the long-term by allowing the exchange of electricity.
SOC_11	Resilience to climate change: Proposals should demonstrate that they have considered the impacts of climate change and have incorporated appropriate adaption measures, taking into account Climate Change Risk Assessments for Wales.	✓	An interconnected European energy grid is vital for achieving the decarbonization and climate policy targets which the European Union has committed to. Greenlink is part of this energy grid.
SOC_12	Support for wider resilience to climate change: Relevant public authorities should support opportunities that contribute towards climate change adaptation and/or mitigation.	X	Not applicable

Policy Code	Policy	Applicable	Reasoning
ENV_01	Resilient marine ecosystems: Proposals should demonstrate how they contribute to the protection, restoration and/or enhancement of marine ecosystems	✓	An assessment of effects on marine ecosystems has been provided in Chapters 7-12 and appropriate mitigation will be applied.
ENV_02	Marine Protected Areas: Proposals should demonstrate how they: ▪ avoid adverse impacts on individual Marine Protected Areas (MPAs) and the coherence of the network as a whole; ▪ have regard to the measures to manage MPAs; and ▪ avoid adverse impacts on non-marine designated sites	✓	An assessment of effects on MPAs has been provided in Chapter 11 and in Technical Appendix C - Greenlink Marine HRA and appropriate mitigation has been applied.
ENV_03	Invasive non-native species: Proposals should include biosecurity measures to reduce the risk of introducing and spreading invasive non-native species.	✓	All vessels will follow International Convention for the Control and Management of Ships' Ballast Water and Sediments 2004 requirements (see Embedded Mitigation, Chapter 4).
ENV_04	Marine litter: Proposals should demonstrate that they: ▪ avoid the deliberate introduction of litter into the marine plan area; and ▪ minimise the risk of accidental release.	✓	All vessels are equipped to meet the requirements under the Merchant Shipping Act 2015. Vessels will also comply with The International Convention for the Prevention of Pollution from Ships 1973 (MARPOL 73/78) (see Embedded Mitigation, Chapter 4).
ENV_05	Underwater noise: Proposals should demonstrate that they have considered man-made noise impacts on the marine environment.	✓	A noise assessment has been undertaken (Technical Appendix D), presented in Chapters 8 and 10, and appropriate mitigation measures proposed.
ENV_06	Air and water quality: Proposals should demonstrate that they have considered their potential air and water quality impacts.	✓	The Proposed Development will not result in deterioration of water quality and air quality (Chapter 6).
GOV_01	Cumulative effects: Proposals should demonstrate that they have assessed potential cumulative effects. Proposals that contribute to positive cumulative effects are encouraged.	✓	Cumulative effects have been assessed in Chapter 16.

Policy Code	Policy	Applicable	Reasoning
GOV_02	Wales' well-being goals: Relevant public authorities should seek to maximise the contribution to the achievement of the seven well-being goals for Wales and make their decisions in accordance with the sustainable development principle.	X	Not applicable
SCI_01	Risk-based decision making: Relevant public authorities should make decisions using sound evidence and a risk-based approach. Where appropriate they should apply the precautionary principle and consider opportunities to apply adaptive management.	X	Not applicable
Aggregates			
AGG_02, 03 & 04	Aggregates (safeguarding): Proposals potentially affecting areas where a: ▪ marine licence and production agreement, ▪ exploration or option agreement and ▪ Strategic Resource Areas for aggregate extraction has been granted or formally applied for should not be authorised unless compatibility with the existing, authorised or proposed aggregate activity can be satisfactorily demonstrated or there are exceptional circumstances. Compatibility should be achieved, in order of preference, through: a. avoiding adverse impacts on those activities; and/or b. minimising impacts where they cannot be avoided; and/or c. mitigating impacts where they cannot be minimised. If adequate compatibility cannot be achieved, proposals should present a clear and convincing justification for proceeding.	✓	Not applicable - No aggregate extraction areas along the Proposed Development.
Aquaculture			
AQU_02 & 03	Aquaculture (safeguarding): Proposals potentially affecting areas where: ▪ an application for a Several Order or production rights for aquaculture has been granted or formally applied for,	✓	Not applicable - No aquaculture sites along the Proposed Development.

Policy Code	Policy	Applicable	Reasoning
	- a documented formal agreement is in place between the sea-bed owner and an aquaculture operator, - or an Aquaculture Production Business registration is in place or has been applied for and Strategic Resource Areas should not be authorised unless compatibility with the existing, authorised or proposed aquaculture activity can be satisfactorily demonstrated or there are exceptional circumstances. Compatibility should be achieved, in order of preference, through: - avoiding adverse impacts on those activities; and/or - minimising impacts where they cannot be avoided; and/or - mitigating impacts where they cannot be minimised. If adequate compatibility cannot be achieved, proposals should present a clear and convincing justification for proceeding.		
DEF_01	Defence (safeguarding): Proposals that: - potentially affect Ministry of Defence (MoD) Danger Areas, Exercise Areas or strategic defence interests; and/or - potentially interfere with communication, surveillance and navigation facilities necessary for defence and national security; - should only be authorised with the agreement of MoD.	✓	Impacts on defence have been assessed in Chapter 14. GIL is in ongoing consultation with the MoD to ensure co-existence.
D&D_02	Dredging and disposal (safeguarding): Proposals potentially affecting areas where a consent or authorisation for: navigation dredging; or at-sea disposal of dredged material has been granted or formally applied for should not be authorised unless compatibility with the existing, authorised or proposed dredging or disposal activity can be satisfactorily demonstrated or there are exceptional circumstances. Compatibility should be achieved, in order of preference, through: - avoiding adverse impacts on those activities; and/or - minimising impacts where they cannot be avoided; and/or	✓	The Proposed Development has been routed to avoid dredging and disposal areas. See Chapter 14.

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Policy Code	Policy	Applicable	Reasoning
	c. mitigating impacts where they cannot be minimised. If adequate compatibility cannot be achieved, proposals should present a clear and convincing justification for proceeding.		
D&D_03	Dredging and disposal (safeguarding): Proposals potentially affecting areas undergoing investigation for capital dredging or disposal site characterisation should not be authorised unless compatibility with the existing, authorised or proposed aggregate activity can be satisfactorily demonstrated. Compatibility should be achieved, in order of preference, through: a. avoiding adverse impacts on the areas undergoing investigation; and/or b. minimising impacts where they cannot be avoided; and/or c. mitigating impacts where they cannot be minimised. If adequate compatibility cannot be achieved, proposals should present a clear and convincing justification for proceeding.	✓	
ELC_02, 03 & 04	Low carbon energy (safeguarding): Proposals potentially affecting areas where: - consent or authorisation for renewable energy generation has been granted or formally applied - - an exploration or option agreement has been offered or is in place for renewable energy generation, including for demonstration areas, - Strategic Resource Areas for renewable energy (including those within the UK Offshore Energy SEA process), should not be authorised unless compatibility with the existing, authorised or proposed renewable energy activity can be satisfactorily demonstrated or there are exceptional circumstances. Compatibility should be achieved, in order of preference, through: a. avoiding adverse impacts on those activities; and/or b. minimising impacts where they cannot be avoided; and/or c. mitigating impacts where they cannot be minimised.	✓	Impacts on sites for the development of low carbon energy have been assessed in Chapter 14. GIL is in ongoing consultation with Marine Energy Wales and Bombora Wave Power to ensure co-existence.

Policy Code	Policy	Applicable	Reasoning
	If adequate compatibility cannot be achieved, proposals should present a clear and convincing justification for proceeding.		
O&G_03	Oil and gas (safeguarding): Proposals in areas where approval for oil and gas infrastructure has been granted or formally applied for should only be authorised where compatibility with the existing, authorised or proposed activity can be satisfactorily demonstrated or there are exceptional circumstances. Compatibility should be achieved, in order of preference, through: a. avoiding adverse impacts on those activities; and/or b. minimising impacts where they cannot be avoided; and/or c. mitigating impacts where they cannot be minimised. In exceptional circumstances, if adequate compatibility cannot be achieved, proposals should present a clear and convincing justification for proceeding.	✓	There are no oil and gas proposals or projects in the region - see Chapter 14.
O&G_04	Oil and gas (safeguarding): Proposals potentially affecting future potential activity in areas (blocks) offered for oil and gas licensing should avoid sterilisation of that area for future oil and gas extraction and demonstrate how they, in order of preference: a. avoid potential adverse impacts on those activities; and/or b. minimise potential impacts where they cannot be avoided; and/or c. mitigate potential impacts where they cannot be minimised; and should present a clear and convincing justification for proceeding where (a-c) are not possible.	✓	The Proposed Development will not sterilise an area for future oil and gas exploration.
FIS_02	Fisheries (safeguarding): Proposals potentially displacing commercial fishing activities should demonstrate how they, in order of preference: a. avoid displacing those activities; and/or b. minimise impacts where they cannot be avoided; and/or c. mitigate impacts where they cannot be minimised; and	✓	Impacts on commercial fisheries have been assessed in Chapter 12. The Proposed Development will have a Fisheries Liaison Officer in place throughout installation.

Policy Code	Policy	Applicable	Reasoning
	should present a clear and convincing justification for proceeding where (a-c) are not possible.		
FIS_03	Fisheries (safeguarding): Proposals potentially affecting important feeding, breeding (including spawning & nursery) and migration areas or habitats for key species of commercial or ecological importance should demonstrate how they, in order of preference: a. avoid adverse impacts on those areas; and/or b. minimise impacts where they cannot be avoided; and/or c. mitigate impacts where they cannot be minimised; and should present a clear and convincing justification for proceeding where (a-c) are not possible.	✓	Impacts on important feeding, breeding (including spawning & nursery) and migration areas have been assessed in Chapter 8. Where necessary appropriate mitigation is proposed.
P&S_03	Ports and shipping (safeguarding): Proposals potentially affecting Strategic Resource Areas for: ▪ established commercial navigation routes; ▪ pilot boarding areas and commercial anchorages; or ▪ existing port, harbour and marina activities and their potential for future expansion; including where a consent or authorisation has been granted or formally applied for, should not be authorised except where compatibility with the existing, authorised or proposed activity can be satisfactorily demonstrated or there are exceptional circumstances. Compatibility should be achieved, in order of preference, through: a. avoiding adverse impacts on those activities; and/or b. minimising impacts where they cannot be avoided; and/or c. mitigating impacts where they cannot be minimised. If adequate compatibility cannot be achieved, proposals should present a clear and convincing justification for proceeding.	✓	A Navigation Risk Assessment has been undertaken; the results of which are presented in Chapter 13. Milford Haven Port Authority has been consulted throughout route development.

Policy Code	Policy	Applicable	Reasoning
SWW_01	Surface water runoff and waste water treatment and disposal (safeguarding): Proposals potentially affecting existing and planned wastewater management and treatment infrastructure where a consent or authorisation or lease has been granted or formally applied for should not be authorised unless compatibility with the existing, authorised or proposed activity can be satisfactorily demonstrated or there are exceptional circumstances. Compatibility should be achieved, in order of preference, through: a. avoiding adverse impacts on those activities; and/or b. minimising impacts where they cannot be avoided; and/or c. mitigating impacts where they cannot be minimised. If adequate compatibility cannot be achieved, proposals should present a clear and convincing justification for proceeding.	x	The Proposed Development will not affect existing and planned wastewater management and treatment infrastructure.
T&R_02	Tourism and recreation (safeguarding): Proposals should demonstrate that they have taken appropriate measures to avoid, minimise or mitigate adverse effects on existing and known planned tourism and recreation activities. Proposals that would have a significant adverse effect on Welsh Government's recreation, sport and tourism objectives should not be authorised unless there are exceptional circumstances.	✓	An assessment of the affects the Proposed Development will have on recreation is presented in Chapter 14. Where necessary appropriate mitigation is proposed.