



FAB Link Ltd

Concept for Public Participation

October 2014

<b>RESPONSIBILITY</b>	<b>NAME</b>	<b>DATE</b>
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<b>REVISION NUMBER</b>	<b>DESCRIPTION</b>	<b>DATE</b>
Issue 1	First Issue for pre-submission comments	17 October 2014
Issue 2	For submission to authorities	30 October 2014

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Front cover: the site of one of the proposed cable landfalls on Alderney.

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## **1. INTRODUCTION**

FAB Link Ltd<sup>1</sup>, along with its French partner Réseau de Transport d'Électricité (RTE), is proposing the construction of an interconnector between Manuel 400kV substation on the Contentin peninsula in France and Exeter 400kV substation in Devon. This is known as the France-Alderney-Britain (or "FAB") project.

Because of its contribution to the European energy policy objectives of competitiveness, sustainability and security of supply, the FAB project has been adopted by the European Union as a Project of Common Interest (PCI).

As a result of the FAB project being designated as a Project of Common Interest, the requirements set out in EU Regulation 347/2013 ("The Regulation on Guidelines for Trans-European Energy Infrastructure") apply. This includes a requirement to submit a Concept for Public Participation to the relevant national authorities. This document fulfils that requirement for the parts of the project in the UK; an equivalent document in French fulfils the requirement for the parts of the project in France.

## **2. PROJECT OVERVIEW**

This section describes the key features of the FAB project. More detailed information will be available in the project brochure that will be available through the forthcoming project website (see section 3.5), and other consultation documents.

### **2.1 Project Elements**

It is envisaged that the FAB project will comprise the following elements:

- i) AC cables between the existing 400kV AC substation at Exeter and the proposed UK AC/DC converter station.
- ii) An AC/DC converter station in the UK.
- iii) An onshore DC cable to the proposed UK landfall point.
- iv) A landfall point for the proposed offshore DC cable in the UK.
- v) An offshore DC cable between the UK and the Channel Island of Alderney.
- vi) An onshore DC cable across Alderney, with landfall points on either side of Alderney.
- vii) An offshore DC cable between Alderney and the proposed French landfall point.
- viii) A landfall point for the proposed offshore DC cable in France.

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<sup>1</sup> Project ownership is discussed further in section 2.2 below.

- ix) An onshore DC cable from the landfall point to the French converter station.
- x) An AC/DC converter station in France
- xi) AC cables between the French converter station and the existing 400kV substation at Menuel.

## 2.2 Project Ownership

The FAB project is being developed by three companies, based in the UK, Alderney and France respectively.

- i) Transmission Investment ([www.transmissioninvestment.com](http://www.transmissioninvestment.com)) is a UK-based firm that specialises in the development, acquisition, financing and management of electricity transmission assets. Transmission Investment is a partner in Transmission Capital Partners (for more information see: [www.transmissioncapital.com](http://www.transmissioncapital.com)) and through this it runs – or has been selected to run – the connections to 850MW of offshore wind generation. Transmission Investment is the lead entity for UK consenting activities.
- ii) Alderney Renewable Energy (ARE, [www.are.gg](http://www.are.gg)) is developing tidal power generation in the waters around Alderney under a licence issued by The States of Alderney and the Alderney Commission for Renewable Energy. Alderney is one of the best locations in Europe for tidal power generation, and ARE intends to use the FAB project to export renewable energy from Alderney to the UK and/or France.
- iii) RTE Réseau de Transport d'Electricité ([www.rte-france.com](http://www.rte-france.com)) is the French company responsible for developing, maintaining and operating all electricity transmission assets in France, and for ensuring the secure supply of power. RTE is the owner of all transmission assets in France, including the French ends of the existing interconnectors to Belgium, Germany, Switzerland, Italy, Spain and the UK. RTE is the lead entity for French consenting activities.

A joint venture company known as “FAB Link Ltd” acts as a vehicle for the delivery of the project outside of France. Ofgem (the British national regulatory authority for the electricity and gas industries) has issued an Interconnector Licence under section 6(1)(e) of the Electricity Act 1989 to FAB Link Ltd, which entitles it to “participate in the operation of the FAB Link interconnector”. FAB Link Ltd is the originator of this Concept for Public Participation.

### **3. CONCEPT FOR PUBLIC PARTICIPATION**

This section describes how the requirement for public participation is to be implemented on the UK side of the FAB project. It has been prepared in line with Article 9 and Annex VI of EU Regulation 347/2013 and the UK Manual of Procedures<sup>2</sup>.

#### **3.1 Principles**

FAB Link Ltd will adopt the following principles when implementing public participation:

- i) The stakeholders affected by the FAB project shall be extensively informed and consulted.
- ii) Such consultations are to be undertaken at the earliest stage where sufficient information is available to adequately inform the stakeholder(s) in question and at a time where the project is still at a formative stage and permit applications have not been submitted. It is noted that, since the necessary information will not become available at a single point in time, the timing of consultation activities may vary between stakeholders and that for some stakeholders there may be multiple stages in the project development at which their opinion is sought. (Further information on timing is contained in section 3.6 below)
- iii) We shall have regard to the information and representations provided through these consultations to help us to identify the most suitable sites and routes for the project.
- iv) Within two months of the commencement of public consultation in either the UK or France, we will establish a vehicle for cross-channel public consultation through a shared website (see below). This website will provide information to all stakeholders, including interested members of the public, along with a mechanism to provide feedback on the project proposals. This will be in addition to other mechanisms of public consultation.

As there are no other Projects of Common Interest (PCIs) in the vicinity of the FAB project, common consultation arrangements are not necessary and the FAB project will undertake its public participation activities on a standalone basis.

#### **3.2 The Stakeholders to be Consulted**

The Regulation requires that the stakeholders to be consulted must include “relevant national, regional and local authorities, landowners and citizens living in the vicinity of the project, the general

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<sup>2</sup> The document “Manual of Procedures: The permitting process for projects of Common Interest in the UK”, published by DECC in May 2014.

public and their associations, organisations or groups". Specific stakeholders identified and to be consulted on the FAB project include:

- i) East Devon District Council (EDDC), as the decision making authority for the planning application.
- ii) The Marine Management Organisation (MMO), as the decision making authority for the Marine Licence application.
- iii) Entities that are statutory consultees for the planning application. Consultation may be direct or via EDDC depending on the circumstances. Examples of such entities are Natural England, English Heritage, and the Environment Agency.
- iv) Entities that are statutory consultees for the Marine Licence application. Consultation may be direct or via MMO depending on the circumstances. Examples of such entities are the Joint Nature Conservation council, the Maritime and Coastguard Agency and Trinity House.
- v) The relevant highways authorities.
- vi) Onshore cable easement grantors (public and private land owners).
- vii) Public representatives other than those for EDDC (e.g. parish councils, MPs).
- viii) The national bodies responsible for the legislative and economic regulatory frameworks for interconnectors. These are DECC (the Department of Energy and Climate Change) and Ofgem (the Office of Gas and Electricity Markets).
- ix) The Crown Estate (seabed owner).
- x) Other users of the sea in the vicinity of the cable route through their relevant representative associations. In order to determine which users of the sea (e.g. shell fishing, angling, yachting, shipping, etc) could be affected, and the appropriate associations to approach, the project will make use of work that will be undertaken as part of the marine licence application, namely mapping the activities of other users of the sea along the cable route, and mapping any marine habitats along the route that are relevant for commercial or recreational fisheries.
- xi) People living in the vicinity of the AC/DC converter station site, and occupiers of business premises in the vicinity of this land.

- xii) People living in the vicinity of any cable route option, and occupiers of business premises in the vicinity of such routes.
- xiii) Occupiers of domestic or business premises at locations where road closures for cable laying may have a disproportionate impact on travel, or where special measures may be required for vehicular access during construction of the project.
- xiv) Any other relevant stakeholder identified by the relevant authorities.
- xv) The general public and their associations, organisations or groups.

Stakeholder consultation prior to the issuing of this document comprised discussions with EDDC, MMO, certain statutory consultees (through EDDC) and selected land owners. The local Member of Parliament has been informed of the project and has asked to be kept informed as the project progresses.

### 3.3 The Measures Envisaged

The mechanisms for informing and consulting the stakeholders prior to the submission of consent applications for the FAB project include the following:

Consultee	Mechanisms for informing and consulting
<b>EDDC</b>	Face-to-face meetings supplemented by electronic communications. These meetings have already commenced and are expected to continue through all stages of project definition and analysis.  In addition to discussions with EDDC officers, a pre-planning-permission-application presentation to EDDC elected members will be arranged if requested.
<b>MMO</b>	Face-to-face meetings supplemented by electronic communications. These meetings have already commenced and are expected to continue through all stages of project definition and analysis.
<b>Statutory Consultees (planning application)</b>	May be indirect via EDDC at the option of EDDC. Where necessary face-to-face meetings and/or direct electronic communications may be used.



<b>Statutory Consultees (marine licence application)</b>	May be indirect via MMO at the option of MMO. Where necessary face-to-face meetings and/or direct electronic communications may be used.
<b>Highways Authorities</b>	Face-to-face meetings supplemented by electronic communications.
<b>Onshore cable easement grantors</b>	Face-to-face meetings, supplemented by electronic communications if necessary, undertaken by FAB Link's land agents and (if desired by the land owner) the landowner's land agent.
<b>The Crown Estate</b>	Face-to-face meetings supplemented by electronic communications.
<b>Public representatives other than EDDC</b>	Face-to-face presentations to parish councils at the converter station site, along the onshore cable route, and at the cable landfall. Other public representatives are to be contacted electronically and, in addition to their right to make representations regarding the project, they will be offered the opportunity to be briefed on the project by the project team.
<b>DECC and Ofgem</b>	Face-to-face presentations to discuss project progress and issues of relevance to the project's economics and regulation. Ofgem will undertake project assessments to confirm that project economics remain attractive.
<b>Other users of the sea</b>	Face-to-face meetings with representative associations where necessary.
<b>People living in the vicinity of any cable route option, and occupiers of business premises in the vicinity of such routes.</b>	<p>Invitations delivered "through the letterbox" to attend a dedicated project meeting arranged in an exhibition format (see below).</p> <p>The project website will provide further opportunities to learn about the project, and to make representations on it.</p> <p>Project website provides access to written documents regarding the project.</p>
<b>Other stakeholders identified by consenting authority</b>	As agreed with consenting authority, but likely to be based on one of the other mechanisms set out above.
<b>General public</b>	Via the project website. The website will include details of the dedicated project meetings and an open invitation to attend these.

### **3.4 Dedicated Project Exhibitions**

FAB Link Ltd will arrange a series of public meetings (arranged in an “exhibition” format) that will describe the project and give attendees the opportunity to resolve questions, offer advice and register comments. These events will include:

- i) Information on the project in the form of, for instance, descriptive boards showing full details of the proposed cable route(s), information on installation methods, pictures from other projects, photomontages, and a description of the environmental analysis undertaken by the project.
- ii) Distribution of information leaflets which will comply with the requirements of Regulation 347/2013 (e.g. maximum 15 pages, describing alternatives considered and expected impacts). The leaflets will include a clear and concise overview of the project, a description of the project’s purpose and benefit, a description of possible mitigation measures, and a preliminary timetable for the project.
- iii) An opportunity to meet project managers and specialists who can describe the project, including details of particular interest to the person in question.
- iv) An opportunity to provide direct feedback on the proposals to project staff.
- v) Contact / website details and response forms to allow more information to be sought or further feedback to be provided outside of the exhibition.

Locations for exhibitions will be selected in order to ensure a reasonable level of accessibility.

Feedback and questions raised by persons attending these meetings will to be recorded, along with feedback provided through the project website, and other source through which representations may be received. All representations will be taken into account in formulating the proposals, and a report on the findings of the consultation process will be submitted with applications for planning permission and the marine licence.

### **3.5 Project Website**

A project website is to be established at the domain name Fablink.net. This is to be a single site that will serve all the jurisdictions through which the cable passes, with separate English-language and French-language areas.

To ensure co-ordination between the UK and French public participation activities, the shared website is to become operational at the sooner-to-occur of the following:

- i) The start of public consultation activities in the UK.
- ii) No more than two months after the start of public consultation activities in France.

The website will contain all information required by Regulation 347/2013, including:

- i) The information leaflet referred to above, in electronic form.
- ii) A non-technical and regularly updated summary of no more than 50 pages reflecting the current status of the project and clearly indicating, in case of updates, changes to previous versions.
- iii) The project and public consultation planning, clearly indicating dates and locations for public exhibitions and hearings and the envisaged subject matters relevant for those hearings.
- iv) Contact details in view of obtaining the full set of application documents
- v) Contact details in view of conveying comments and objections during public consultations.

### **3.6 Timeline**

The UK Manual of Procedures notes that for many projects “it is not possible to specify exact dates or locations for any dedicated meetings [for FAB this means the public exhibitions described above]”. It continues that “in such circumstances, it may be acceptable for the concept to set out in general terms what is proposed and use an indicative timescale in which consultations would be undertaken”, and this is what has been done below.

The indicative timescale in which consultations will be undertaken is as follows:

- i) The shared project website will go live within two months of the approval of this document and the commencement of consultations work in GB and/or France. This is expected to occur in late 2014 or early 2015.
- ii) Over the period from late 2014 to late 2015 we expect to undertake consultations with relevant stakeholders (likely to include those listed as items (i) to (vii) in section 3.2

above) to allow us to define the project to the level of detail necessary for public consultation. There may be a requirement for more than one consultation meeting with certain of these consultees.

- iii) In late 2015, over a period of at least 3-4 weeks, we would undertake the project exhibitions referred to above.
- iv) Following the public exhibitions, the representations received will be analysed and considered as part of the project design process before consent applications are formulated.

### **3.7 Resources**

Of the three companies involved in the development of the FAB project, it is Transmission Investment that is taking the lead in relation to activities in the UK and the UK-side public participation process. The French-side public participation process is being led by RTE.

Transmission Investment already manages in-service high voltage offshore and onshore cables with a circuit length of over 200km, along with several high-voltage onshore facilities, and as such employs staff with considerable technical experience with similar projects. Transmission Investment also employs staff who have managed the development and environmental permitting of major new international interconnector cables and converter stations of the same type and scale as FAB.

It is envisaged that the number of persons within Transmission Investment working on the UK-side design and consenting issues (including informing and consulting with stakeholders) will be on the order of 1-2 full time equivalents from late 2014 to late 2015. This will be supplemented by a similar or greater level of external resource provided by a planning and environmental consultancy.

For the project exhibitions referred to above, it is expected that the following resources will be used:

- i) The FAB project director.
- ii) The FAB consents manager.
- iii) Two or more engineers with experience of high-voltage cables, converter stations and other power-transmission equipment.
- iv) At least two planning & environmental specialists provided by our planning advisor.

- v) Such other specialist advisors that may be required depending on the issues raised in the consultation process
  
- vi) A public relations consultancy to manage the logistics of events, invitations, presentation materials, etc.