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Re: Strategic Issues Paper, Leitrim County Development Plan 2022 - 2028

EirGrid plc welcomes the opportunity to make a submission to the Strategic Issues Paper for Leitrim County Development Plan 2022 – 2028 and requests that this submission is taken into consideration in the development of the Plan.

EirGrid is a Prescribed Authority for the purposes of Section 11 (2) of the Planning and Development Act 2000, as amended, and has been involved in the making of Project Ireland 2040 (National Planning Framework) and the North and West Regional Spatial and Economic Strategy (RSES).

EirGrid's Function

EirGrid is responsible for the safe, secure and reliable transmission of electricity – now and in the future. EirGrid develops, manages and operates the electricity transmission grid. This brings power from where it is generated to where it is needed throughout Ireland. The grid also supplies power to industry and businesses that use large amounts of electricity and powers the distribution network. The distribution network in turn supplies electricity to homes, businesses, schools, hospitals, and farms.

EirGrid's function as the national electricity Transmission System Operator (TSO) is set out in the European Communities (Internal Market in Energy) Regulations, 2000 - SI 445/2000. Article 8(1) (a) gives EirGrid as TSO, the exclusive statutory 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 having due regard for the environment.”

The transmission system on the island of Ireland refers to the higher capacity electricity network and primarily comprises substations and circuits at 400 kV, 220 kV, and 110 kV (in Northern Ireland, transmission infrastructure also occurs at 275 kV). EirGrid’s (2016) Transmission System Map is illustrated below.



Figure 1 – EirGrid transmission network

Regional Context

The Regional Spatial and Economic Strategy (RSES) for the Northern and Western Region recognises (p. 162) that energy is needed for economic growth, and access to affordable and reliable energy is an essential development objective. Decarbonisation can and needs to happen and it is an objective of the National Planning Framework that Ireland becomes a Low Carbon Economy by 2050. This reflects the Governments 2014 *National Policy Position on Climate Action and Low Carbon Development* and is also a binding EU requirement. Ireland's national energy policy is focused on three pillars: sustainability, security of supply and competitiveness.

The Northern and Western Region is particularly well placed to lead the way in the efficient use of resources and developing a low carbon economy, and many of the companies involved in supplying the enabling advice or technologies operate from within this region.

The Belmullet – Erris energy test hub is an example. New renewable energy technology progresses from the test facilities at the Lir National Test facility in Cork, to a quarter scale test bed in Galway Bay, and to a full test facility at the Atlantic Marine Energy Test Site (AMETS) near Belmullet, County Mayo. This is part of an international Regime of test sites including Hawaii, Ireland and Scotland. This international chain of test sites brings devices through the various technology readiness levels which ensures investment in the technology is made on a sound and standardised footing. It also illustrates the unique strategic position Ireland and the Northern and Western Region has in relation to offshore renewable energy.

The Sustainable Energy Authority of Ireland is developing the Atlantic Marine Energy Test Site (AMETS) to facilitate the testing of full scale ocean energy converters both wind and wave, in an open ocean environment. It is located off Annagh head, west of Belmullet in Co Mayo and will be connected to the national grid. AMETS is an integral component of Irelands ocean energy strategy and test facilities and is being developed in accordance with the national Offshore Renewable Energy Plan (OREDPA). AMETS will provide for full scale test opportunities in extreme Atlantic conditions and is intended as the ultimate test site for pre commercial stage devices.

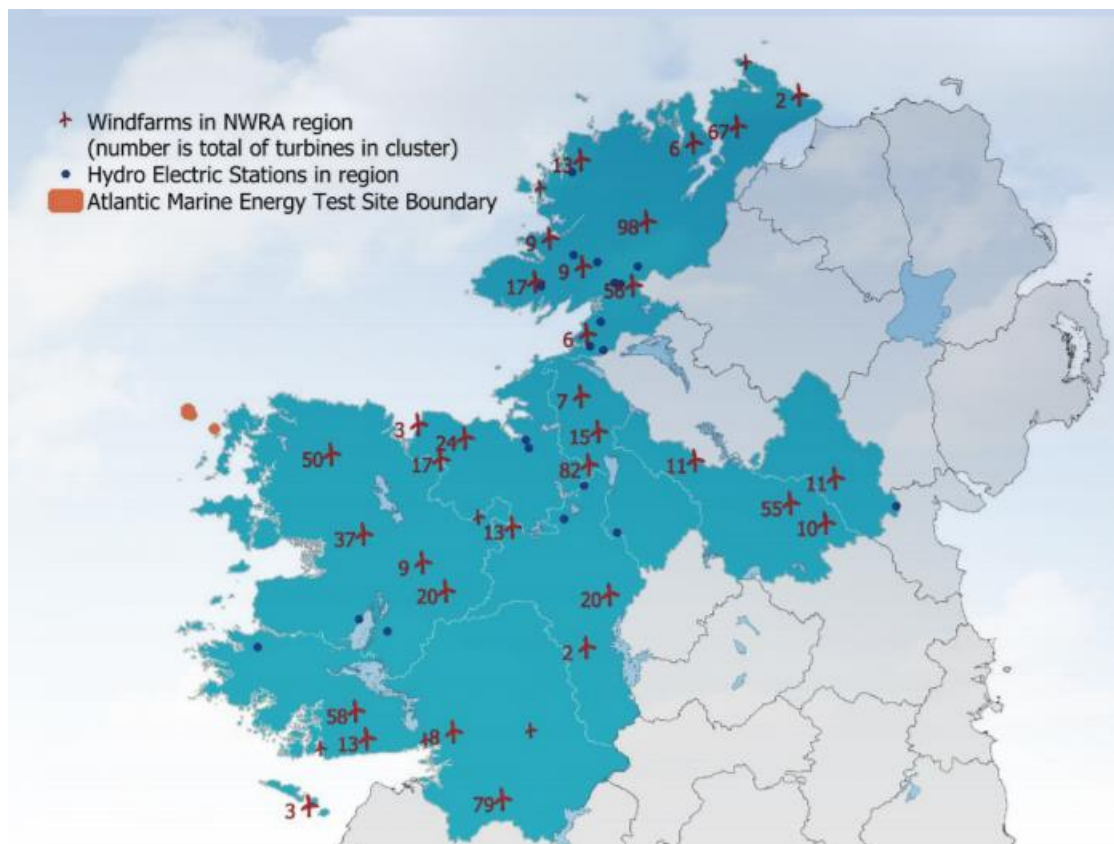


Figure 2 - Wind Farms and Hydro-Stations in the Region (RSES, p. 163)

An understanding of locations of the higher voltage electricity infrastructure is useful when seeking to identify regional opportunities that may attract industries (e.g. data centres, renewables, etc.). As detailed previously, the Northern and Western Region is particularly rich in renewable energy resources. These generation sources are dispersed across the region but particularly concentrated along the western coastline. There is also a large conventional thermal generator located at Tynagh substation, Co. Galway

EirGrid has a number of proposed infrastructure upgrades in the Region set out below in Table 1 and the RSES gives full support to the delivery of these projects in its Regional Policy Objectives RPO 4.16 to RPO 4.22 and RPO 8.1 to RPO 8.4

The total improvements to grid infrastructure in the Region will comprise 200km of a new transmission network and line upgrades of 700km. The delivery of these projects will ensure that the population growth projections outlined in the RSES will have sufficient electricity infrastructure to service them. The infrastructure improvements will also facilitate the incorporation of known renewable energy generated power into the transmission network.

Project Name	Location
North Connacht Project	Roscommon, Sligo, Mayo
Regional Solution Project (series compensation on 400 kV network)	Galway
North South 400 kV Interconnector	Meath, Cavan, Monaghan, Armagh, Tyrone
Bellacorick – Castlebar 110 kV Line update	Mayo
North West Project (study area)	Donegal, Leitrim, Sligo
Bellacorick – Moy 110 kV Line update	Mayo
Cashla – Salthill 110 kV Line update	Galway
Galway 110 kV Station Redevelopment	Galway

Table 1 – EirGrid projects within the NWRA region

North West Project

As set out in Table 1 above EirGrid’s project of most relevance to County Leitrim is the North West Project – this project is now known as the Renewable Integration Development Project (RIDP).

Northern Ireland Electricity (NIE), EirGrid and the System Operator for Northern Ireland (SONI) have responsibility for developing and operating the electricity network in Northern Ireland and the Republic of Ireland. The three organisations are jointly developing RIDP the aim of which is to identify the optimum reinforcement of the electricity transmission grid in the north and the north-west of the island to cater for expected power output from renewable energy sources. This will require new power lines to be built.

RIDP will help both Governments achieve their renewable energy generation targets of 40 percent of electricity consumption by 2020. As well as ensuring that demands from renewable generators for connection to the transmission network can be met, RIDP will also considerably strengthen the existing grid – significantly increasing the transmission grid in Northern Ireland, while enhancing the capabilities of the grid in the Republic of Ireland. This is required to make the grid fit for purpose. The project will create highly skilled jobs in the planning and construction phase and will facilitate the attraction of investment to the island of Ireland.

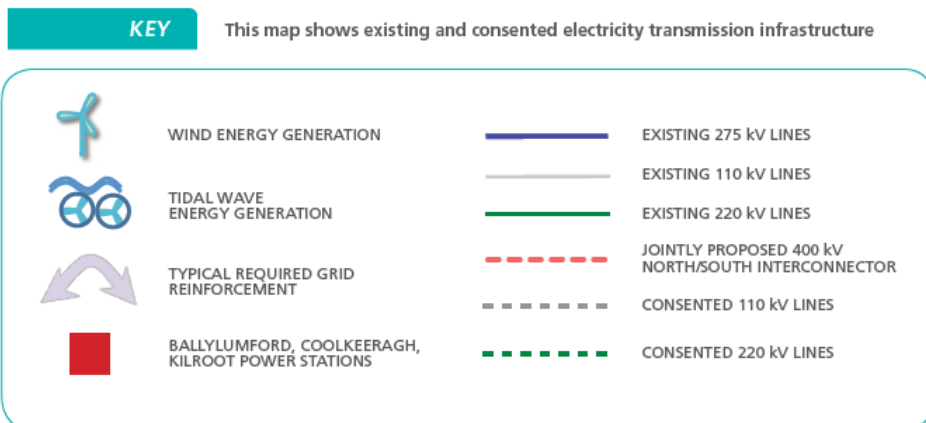
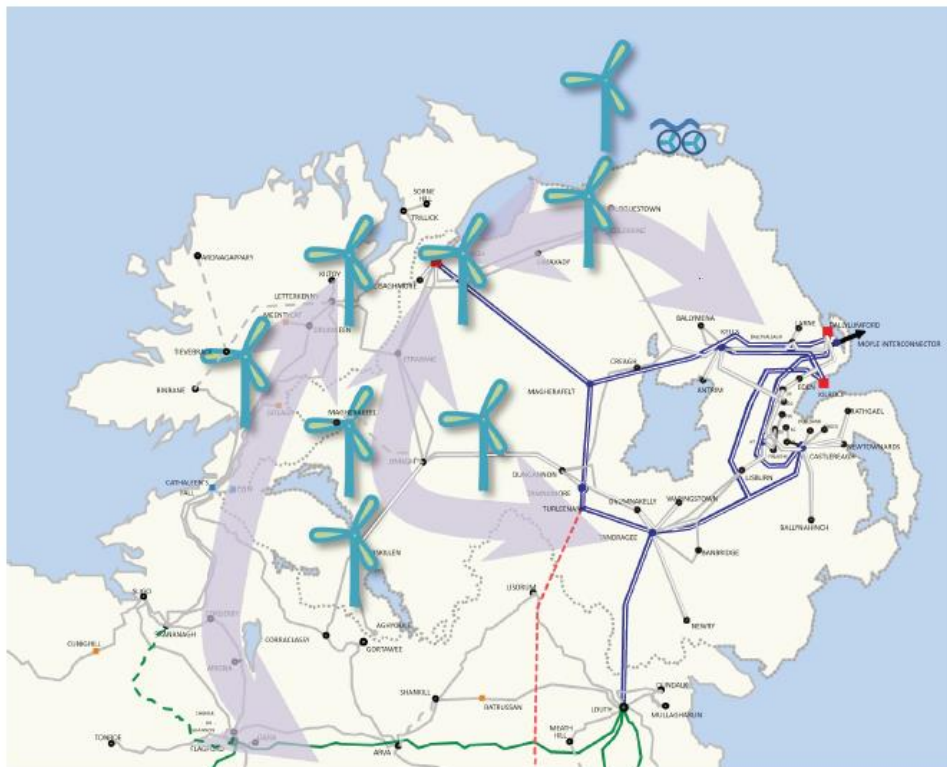


Figure 3 – RIDP information brochure extract

Currently, just 30% of the electricity that we use comes from renewable energy. The Government’s Climate Action Plan 2019 has set the target of achieving 70% of electricity consumption via renewable energy sources by 2030. The vast majority of this renewable energy will come from wind farms and EirGrid is required by law to connect them to the national grid.

EirGrid requests the forthcoming Draft Development Plan explicitly supports the reinforcement and strengthening of the electricity transmission network with particular reference to the regionally important projects such as RIDP.

Policy-Led Strategy

The electricity transmission grid's importance in supporting our environment, society and economy should not be understated in the forthcoming Draft Development Plan. EirGrid notes and welcomes reference and emphasis in the Strategic Issues Paper on climate action and the forthcoming Renewable Energy Strategy. EirGrid considers that policies and objectives which support a safe, secure and reliable supply of electricity need to be explicit in the Draft Development Plan in order to assist EirGrid in the successful implementation of its *Grid Development Strategy - Your Grid, Your Tomorrow* (2017) (ENCL1). This is imperative to meeting national targets for electricity generation, climate change targets, and security of energy supplies.

In this context the policies and objectives in the adopted Regional Spatial and Economic Strategy (Section 8.2) should be reviewed and considered as an example of robust and sustainable policies and objectives. The planning authority may consider these adequate for inclusion in the forthcoming Draft Development Plan.

EirGrid also requests the Draft Plan be explicit as to how the various Government and State Agency policy documents have been considered, and how they have informed the policy and objectives. A section should be included setting out how these policy documents have been considered in a holistic and integrated way to inform subsequent Plan policy. This gives a clear policy-led foundation to the Plan, which will prove invaluable as it subsequently informs the strategies, policies and objectives of local authority plans and public and private projects.

In terms of electricity transmission there are a number of important Government Policy documents namely:

- Department of Communications, Energy and Natural Resources (2012) *Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure*
- Department of Communications, Energy and Natural Resources (2015) *White Paper On Energy: Ireland's Transition to a Low Carbon Energy Future 2015-2030;*
- Department of Communications, Energy and Natural Resources (2019) *Climate Action Plan;*
- EirGrid's (2017) *Grid Development Strategy - Your Grid, Your Tomorrow;*
- EirGrid (2017) *Tomorrow's Energy Scenarios 2017: Planning our Energy Future.*
- Department of Housing, Planning and Local Government (2019) *National Planning Framework*
- Department of Housing, Planning and Local Government (2019) *Draft National Marine Planning Framework*

In this regard, the Department of Communications, Energy and Natural Resources (2015) White Paper on Energy titled *Ireland's Transition to a Low Carbon Energy Future 2015-2030* reaffirms the Government's position on energy matters. The White Paper acknowledges that developing, maintaining, and upgrading the grid is essential to meeting its short, medium and longer-term objectives. It also has considerable regard to wider emerging EU Policy which promotes smart low-carbon economies centred on energy efficiency.

The *Climate Action Plan 2019* sets out a roadmap to achieve a net zero carbon energy system by 2050. The plan acknowledges that Ireland has to date been very successful in deploying renewable electricity with 30.1% of electricity produced from renewable sources in 2017. The Irish government has confirmed that Ireland will now aim for at least 70% of Ireland's electricity supply to be generated from renewables by 2030. This aim is increased from the target for 2030 which was 55% (RES-E) in Project Ireland 2040.

In order to achieve the target of 70% in the context of rising energy demand, significant progress in renewable electricity deployment will need to continue, with an increased deployment rate of all renewable electricity technologies. The Climate Action Plan states that increased levels of renewable generation will require very substantial new infrastructure, including grid infrastructure.

It is important that the Draft Development Plan reflects EirGrid's need for robust policies to develop the electricity grid in a safe and secure way. This is necessary to meet projected demand levels; to meet Government Policy; and to ensure a long-term, sustainable and competitive energy future for Ireland. The Plan should facilitate the development of grid reinforcements including grid connections and a transboundary network into and through the county and between all adjacent counties and to support the development of international connections.

Conclusion

The development of the transmission grid as summarised above and outlined in detail in EirGrid's *Grid Development Strategy - Your Grid, Your Tomorrow* (2017) and associated Technical Report (2017) (ENCL3), is of critical importance to support the environment, economy and society, as well as to realise the transformation of Ireland's energy system to meet climate change and energy obligations. Electricity infrastructure is critical to balanced regional and local economic and spatial development.

To ensure Ireland's sustainable development and growth, EirGrid requires appropriate and robust policies and objectives for planning the national grid infrastructure and prioritising it appropriately in

order to deliver national, regional and local benefit. In this regard, EirGrid requests that the importance of the grid is acknowledged as a strategic issue.

EirGrid is available to collaborate with the planning authority and to provide expert and focused input into the preparation of the Draft Development Plan, particularly from a strategic energy policy perspective. Should you have any comments in regard of this submission please contact the undersigned. EirGrid once more welcomes the opportunity to participate in the making of the plan and looks forward to further engagement.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Lisa English".

Lisa English

Public Planner

lisa.english@EirGrid.com

Enclosures (links to website)

ENCL 1: [Grid Development Strategy - Your Grid, Your Tomorrow](#)

ENCL 2: [Grid Development Strategy - Your Grid, Your Tomorrow – Technical Report](#)

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