



[www.eirgrid.com](http://www.eirgrid.com)

The Oval, 160 Shelbourne Road  
Ballsbridge, Dublin D04 FW28, Ireland

**Telephone** +353 1 677 1700

**Email** [info@eirgrid.com](mailto:info@eirgrid.com)

Administration Officer  
Planning Department  
Roscommon County Council  
Áras an Chontae  
Roscommon  
County Roscommon  
F42 VR98

31 July 2020

**Re: Submission on Issues Paper, Roscommon County Development Plan 2021 - 2027**

EirGrid plc welcomes the opportunity to make a submission to the Issues Paper for Roscommon County Development Plan 2021 – 2027 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 in which the strategic issue of the future development of Ireland’s electricity transmission grid was highlighted and extensively addressed in Section 8.2. It is requested that the Plan is, in so far as is practicable, consistent with such national plans, policies or strategies as the Minister determines relate to proper planning and sustainable development.

### **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 (i.e. 400,000 Volts), 220 kV, and 110 kV (in Northern Ireland, transmission infrastructure also occurs at 275 kV). EirGrid's (2016) Transmission System Map (ENCL1) is enclosed.

## **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 this region has in relation to offshore renewable energy. SEAI is developing the Atlantic Marine Energy Test Site (AMETS) to facilitate the testing of full scale ocean energy converters



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**

The total improvements will comprise 200km of a new transmission network and line upgrade of 700km. The delivery of the above projects will ensure that the population growth projections outlined elsewhere in our strategy 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.

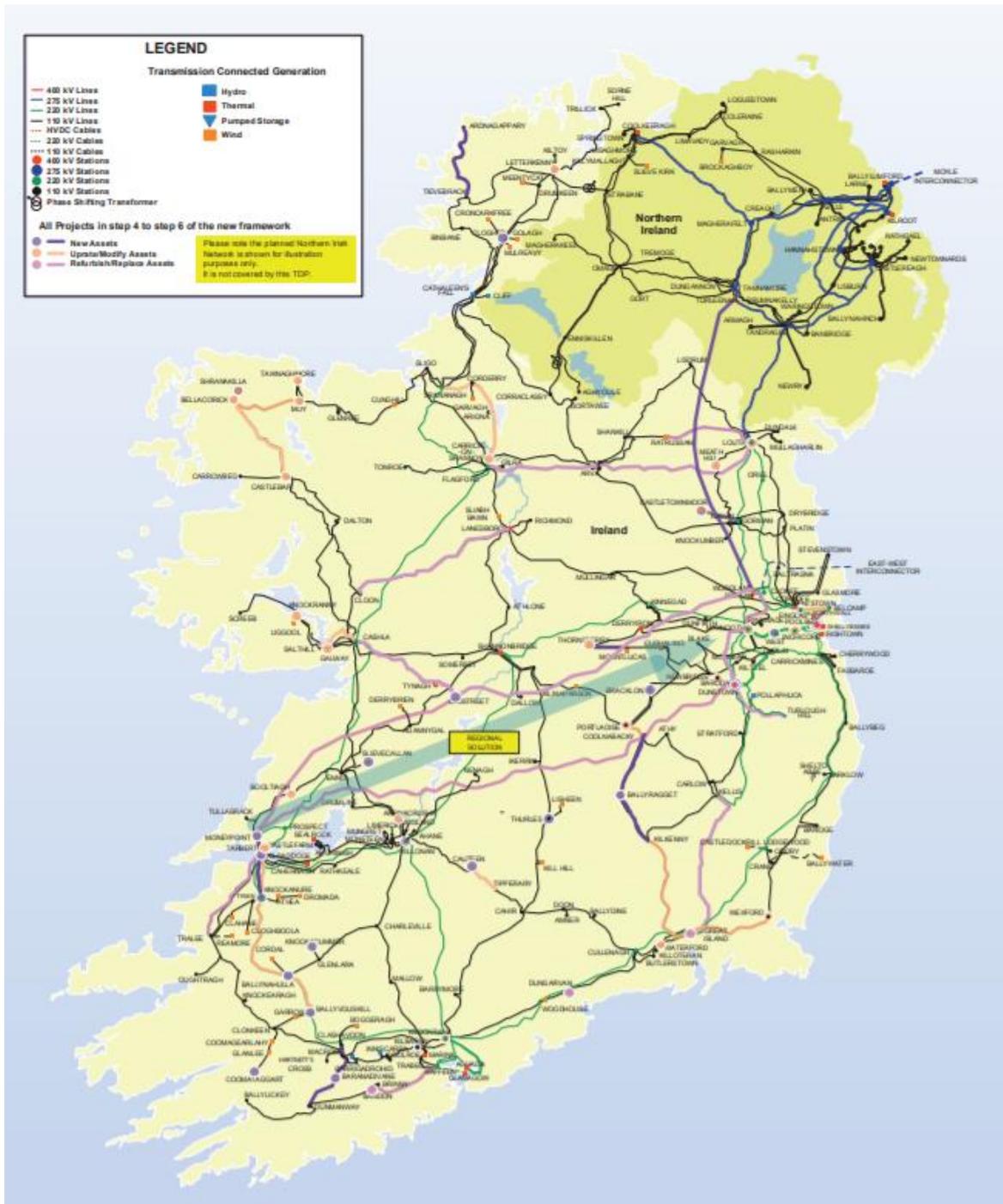


Figure 2 – EirGrid transmission network

The RSES contains a number of Regional Policy Objectives that support the transmission network improvements and facilitation of renewable energy development in the Region. These are RPO 4.16 to RPO 4.22 and RPO 8.1 to RPO 8.4

### North Connaught 110 kV Project

In 2008 a significant amount of renewable electricity generators were seeking connection to the electricity network to the substation adjacent to Bellacorick (Bellacorick 110 kV station) and Ballina (Moy 110 kV station) in Co. Mayo. In 2012 EirGrid proposed the large-scale Grid West project to connect these large amounts of renewable generation via a new substation in the north Connacht area. To facilitate the demand from renewable energy generators EirGrid proposed the Grid West project in 2012, a large scale development to facilitate the level of renewable generation planned at that time.

By June 2017, half of the renewable generators of 2008 decided not to proceed with their projects. Following this reduction in the level of renewable generation, the Grid West project at the scale originally proposed could no longer be justified. In September 2017, EirGrid issued an announcement to replace the Grid West project with a smaller-scale development due to this significant change.

This new project (the North Connacht 110kV Project) involves the development of 110 kV electricity infrastructure; not the 220 kV or 400 kV infrastructure previously proposed under the Grid West project. EirGrid is progressing the North Connacht 110kV project and it is now at Stage 4 of our 6 Step Development Framework.



**Figure 3 – EirGrid’s 6 Step Development Framework**

The start point for the North Connacht 110 kV project will be at Moy substation near Ballina, Co. Mayo. The end point will be at Tonroe substation near Ballaghaderreen, Co. Roscommon. The North Connacht project is supported in the RSES under RPO 8.2.



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 North Connacht 110 kV Project.

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.

The North Connacht project will facilitate the transport of this energy across the country. It will also ensure security of supply for customers and provide the robust electricity infrastructure required by industry across North Connacht. This project supports plans to boost business and investment in the region.

### **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 placed on climate action and energy in the Issues Paper. EirGrid considers that policies and objectives which support a safe, secure and reliable supply of electricity need to be explicit in the Plan in order to assist EirGrid in the successful implementation of its Grid Development Strategy - Your Grid, Your Tomorrow (2017) (ENCL2). 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 and should be relied upon as a source for policy formulation for energy in the Plan. 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. This policy in turn acknowledges the role of sustainable development of individual country's transmission grids to assist in their delivery.

The Climate Action Plan 2019, published on June 17th 2019 by the Department of Communications, Climate Action and Environment, sets out a 'roadmap' to achieve a net zero carbon energy system by 2050. This Plan builds on the policy framework, measures and actions set out in the National Mitigation Plan, Project Ireland 2040 and the Draft National Energy and Climate Plan in order to create a resilient, vibrant and sustainable country. 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. As of the 28th of March, 2019, 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 current target for 2030 which was 55% (RES-E) in Project Ireland 2040.

The plan notes that demand for electricity is forecasted to increase by 50% above existing capacity in the next decade. Therefore, 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.

- At least 3.5 GW of offshore renewable energy;
- Up to 1.5 GW of grid-scale solar energy; and
- Up to 8.2 GW total of increased onshore wind capacity

The Climate Action Plan states that increased levels of renewable generation will require very substantial new infrastructure, including grid infrastructure.

EirGrid's (2017) Grid Development Strategy - *Your Grid, Your Tomorrow* is consistent with the Government White Paper on Energy and Climate Action 2019 and should also be incorporated/referenced in the Plan. The Grid Development Strategy is also set in the context of Government Policy, in particular the Department of Business, Enterprise and Innovations (2017) Action Plan for Jobs 2017 and the Irish Development Authority's (IDA) (2015), *Winning: Foreign Direct Investment 2015-2019*. The Grid Development Strategy acknowledges the need to achieve a balance between social, environmental and economic factors.

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,**

**Lisa English**

**Public Planner**

[lisa.english@eirgrid.com](mailto:lisa.english@eirgrid.com)

**Enclosures (links to website)**

ENCL 1: [Transmission System Map;](#)

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

ENCL 3: [Grid Development Strategy - Your Grid, Your Tomorrow – Technical Report](#)

**References**

Department of Business, Enterprise and Innovations (2017). Action Plan for Jobs 2017. Dublin: DBEI. Available Online.

Department of Business, Enterprise and Innovations (2018). Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy. Dublin: DBEI. Available Online.

Department of Communications, Energy and Natural Resources (2012). *Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure*. Dublin: DCENR. Available Online.

Department of Communications, Energy and Natural Resources (2014). *Offshore Renewable Energy Development Plan*. Dublin: DCENR. Available Online.



Department of Communications, Energy and Natural Resources (2015). *Ireland's Transition to a Low Carbon Energy Future 2015-2030*. Dublin: DCENR. Available Online.

Department of Communications, Energy and Natural Resources (2019). *Climate Action Plan 2019*. Dublin: DCENR. Available Online.

Department of Communications, Climate Action and Environment and Natural Resources (2017). *National Mitigation Plan*. Dublin: DCCAE. Available Online.

Department of Housing, Planning and Local Government (2019) Draft National Marine Planning Framework. Dublin: DHPLG. Available Online.

EirGrid (2016). Transmission System Map. Dublin: EirGrid. Available Online.

EirGrid (2017). *Grid Development Strategy - Your Grid, Your Tomorrow*. Dublin: EirGrid. Available Online.

EirGrid (2017). *Grid Development Strategy - Your Grid, Your Tomorrow [Technical Report]*. Dublin: EirGrid. Available Online.

EirGrid (2020). *Tomorrow's Energy Scenario: Planning Ireland's Energy Future*. Dublin: EirGrid. Available Online.

European Council (2008). *Marine Strategy Framework Directive (2008/56/EC)*. Brussels: EU. Available Online

Government of Ireland (2000). *Planning and Development Act 2000, as amended*. Dublin: The Stationary Office. Available Online.

Government of Ireland (2000). *European Communities (Internal Market in Electricity) Regulations 2000*. Dublin: The Stationary Office. Available Online.

Government of Ireland (2018). *Draft National Energy & Climate Plan (NECP) 2021-2030*. Dublin: Government of Ireland. Available Online.



Government of Ireland (2019). Project Ireland 2040 - National Planning Framework. Dublin: Government of Ireland. Available Online.

Irish Development Authority (2015) Winning: Foreign Direct Investment 2015-2019. Dublin: IDA. Available Online.

North and West Regional Assembly (2020). *North and West Regional Spatial and Economic Strategy*. Ballaghaderreen. NWRA. Available Online.