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

EirGrid plc welcomes the opportunity to make a submission to the Strategic Issues Paper for Clare 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 Southern 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 Transmission System Map is illustrated below.

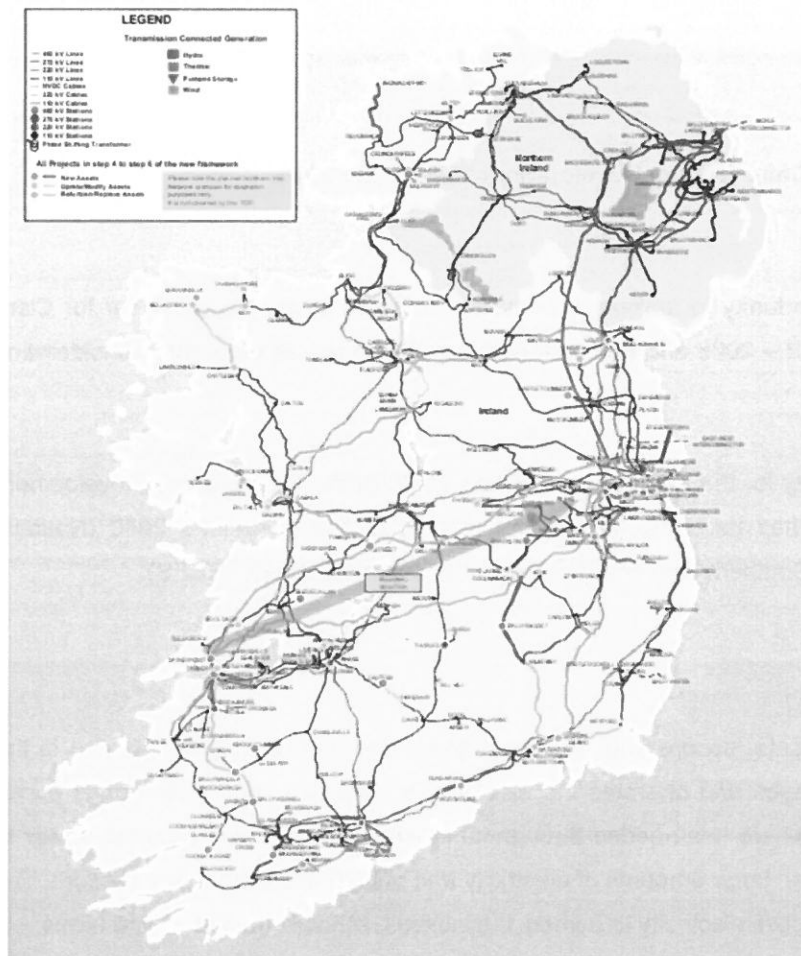


Figure 1 – EirGrid transmission network

Regional Context

Co Clare is located within The Mid-West Planning Area as defined in EirGrid's Transmission Development Plan (TDP) 2020 – 2029. The area has a wide variety of dispersed generation sources including wind, hydro, gas, and coal burning power stations.

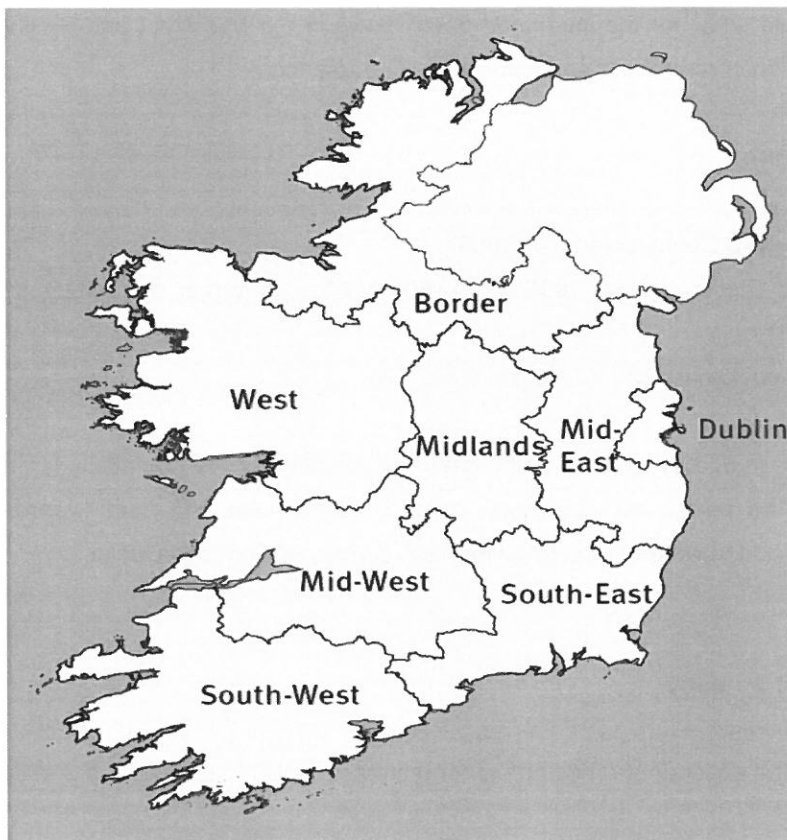


Figure 2 – EirGrid Transmission Planning Areas, TDP 2020 - 2029

The existing transmission network is composed of 110 kV, 220 kV and 400 kV infrastructure. The high capacity 220 kV and 400 kV circuits facilitate high inter-regional power flows. The development of the transmission network in the area is characterised by the connection of high levels of wind generation in Co. Cork and Co. Kerry. These high levels of generation result in transmission network constraints as power is exported from the area towards the Moneypoint and Knockraha transmission stations. Generation levels in the area are set to increase in the coming years. The level of generation is greater than the capacity of the network resulting in local constraints related to power-transfer needs. These large transfers of power create voltage support needs.

The Cross Shannon Project is a critical project that will enable the transmission system to safely accommodate more diverse power flows from surplus regional generation and also to facilitate growth

in electricity demand across the region. The project connects Moneypoint 400 kV Station in Co. Clare and Kilpaddoge 220 kV Station in Co. Kerry. It is currently in the planning application process.

The need for network reinforcement arises due to the large amounts of wind generation connecting to transmission and distribution networks in the west and south-west of Ireland. Without network reinforcement, this would give rise to a risk of overloads on the existing transmission system. The project will relieve constraints and allow for the increased power flows in the Mid-West and South-West that arise from the connection of renewable and conventional generation.

Other critical projects in the area are:

- Moneypoint 400/ 220/ 110 kV GIS Development (CP0688)
- Moneypoint 400/220/110 kV Station - New 400/220 kV 500 MVA transformer to replace an existing transformer (CP1091)
- Moneypoint – Kilpaddoge - Knockanure 220 kV Project (CP0726)

These projects along are part of an overall strategy to increase the capacity for the potentially large power flows from the area. The power will flow north towards Moneypoint and east towards Knockraha transmission stations and onwards to the large demand centres of Cork and Dublin.

Regional Spatial and Economic Strategy

The RSES gives full support to the delivery of renewable energy infrastructure in its Regional Policy Objectives in particular:

- RPO 85 – Renewable Offshore Energy
- RPO 95 – Sustainable Renewable Energy Generation
- RPO 97 – Power Stations and Renewable Energy
- RPO 98 – Regional Renewable Energy
- RPO 99 – Renewable Wind Energy
- RPO 100 – Indigenous Renewable Energy Production and Grid Injection
- RPO 101 – International Hub for Energy Innovation
- RPO 103 – Interconnection Infrastructure
- RPO 104 – Energy Storage and Carbon Capture
- RPO 219 – New Energy Infrastructure
- RPO 220 – Integrated Single Electricity Market (I-SEM)

- RPO 221 – Renewable Energy Generation and Transmission
- RPO 222 – Electricity Infrastructure
- RPO 223 – International Energy Interconnection Infrastructure
- RPO 224 – Delivery of Energy Network.

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

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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