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Forward Planning Section,
Offaly County Council,
Áras an Chontae,
Charleville Road,
Tullamore,
Co. Offaly.

06 October 2020

Re: Submission to the Review of the Offaly County Development Plan 2021 - 2027

Dear Sir/Madam,

EirGrid Group welcomes the opportunity to make a submission on the *Draft Offaly County Development Plan 2021 - 2027* and requests that this submission is taken into consideration in the drafting of the new County Development 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 *Eastern and Midlands 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. It is requested the future development plan is in so far as is practicable is consistent with such national plans, policies or strategies as the Minister determines relate to proper planning and sustainable development.

Climate Action and Energy

The electricity transmission grid's importance in supporting our society and economy should not be understated in the County Development Plan. EirGrid notes and welcomes inclusion in Chapter 3 - Climate Action and Energy reference to its policy documents - *Grid Development Strategy - Your Grid, Your Tomorrow; Tomorrow's Energy Scenarios 2017 – Planning our Energy Future* and *Tomorrow's Energy Scenarios 2019 – System Needs Assessment* - as part of the legislative and policy background to Development Plan Energy policy.

DIRECTORS: John O'Connor *Chairman* • Dr Theresa Donaldson *Deputy Chair* • Mark Foley *Chief Executive*
Shane Brennan, Tom Coughlan, Lynne Crowther, Michael Hand, Eileen Maher, Liam O'Halloran, John Trethowan • Michael Behan *Company Secretary*

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The Draft Development Plan contains two policies on Electricity Transmission and Distribution – CAEP-01 and CAEP-02.

- CAEP-01 – *It is Council policy to support the development, reinforcement, renewal and expansion of the electricity transmission and distribution grid, including the development of new line, pylons and substations as required to provide for the future physical and economic development of Co. Offaly.*

EirGrid considers the policy could be strengthened by inclusion of Regional Policy Objective 10.20 of the RSES that contains the following:

- *It is Council policy to support and facilitate the development, reinforcement, renewal and expansion of the electricity transmission and distribution grid, including the development of new line, pylons and substations as required to provide for the future physical and economic development of Co. Offaly.*

EirGrid does not support a blanket requirement for underground electricity cables and sharing of ducting and access covers in all new development as stated in CAEP-02:

- CAEP-02 – *It is Council policy to require that in all new developments, local services such as electricity shall be underground, multiple services are accommodated in shared strips underground, and that access covers are shared, whenever possible.*

While not supportive of this policy statement, EirGrid can appreciate that the Council is seeking to streamline services provision and avoid visual clutter in new developments. However such a requirement may not always be compatible with electricity infrastructure provision – particularly higher voltage transmission circuits. Therefore, EirGrid request that CAEP-02 is removed as a policy statement. Instead, the Council might consider a more nuanced approach to cables as part of its Development Management Standards.

The midlands regional transmission network is pivotal in transporting power over considerable distances to a widely dispersed range of demand centres. The region has dispersed generation, mainly composed of peat-burning power stations at Lanesboro, Shannonbridge and Cushaling stations, and renewable energy. The existing Midlands transmission network is comprised of 400 kV, 220 kV and 110 kV infrastructure.

In line with comments made by EirGrid on the Strategic Issues Paper, we request that consideration is given to inclusion of the following extracts from the Regional Policy Objectives:

RPO 10:23 – Support EirGrid’s Implementation Plan 2017 -2022 and Transmission Development Plan 2019 and any subsequent plans that facilitate the timely delivery of major investment projects subject to appropriate environmental assessment and the outcome of the planning process.

RPO 10:22 – Support the reinforcement and strengthening of the electricity transmission and distribution network to facilitate planned growth and transmission/ distribution of a renewable energy focused generation across the major demand centres. This includes:

- Facilitating trans-boundary networks into and through the County and Region to ensure the RSES can be delivered in a sustainable and timely manner;*
- Facilitate the delivery of the necessary integration of transmission network requirements to allow linkages of renewable energy proposals to the electricity transmission grid in a sustainable and timely manner;*
- Support the safeguarding of strategic energy corridors from encroachment by other developments that could compromise the delivery of energy networks.*

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 target for 2030 which was 55% (RES-E) in Project Ireland 2040.

Decarbonisation of electricity is at the heart of the Climate Action Plan 2019. The Plan notes that demand for electricity is forecasted to increase by 50% above 2019 capacity levels over the next decade. EirGrid has forecast that by 2027 as much as 31% of electricity generated could be powering data centres. 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. EirGrid has forecast the following electricity generation requirement to meet 2050 renewable energy targets:

- 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. It is imperative that every Local Authority

and County Development Plan supports and facilitates EirGrid's strategy of decarbonising the electricity network to meet our Climate Action Plan targets for 2050

Conclusion

The development of the transmission grid as outlined in detail in EirGrid's Grid Development Strategy - Your Grid, Your Tomorrow (2017) and associated Technical Report (2017) is of critical importance to support the economy and society, as well as to realise the transformation of Ireland's energy system to meet climate change and energy obligations.

EirGrid considers that policies and objectives which support a safe, secure and reliable supply of electricity need to be explicit in the Development Plan in order to assist EirGrid in the successful implementation of its Grid Development Strategy. 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 should be reviewed and considered as an example of robust and sustainable policies and objectives.

Electricity infrastructure is critical for regional and local economic and spatial development. To ensure Ireland's sustainable development and growth, EirGrid requires appropriate and robust policy 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 reflected in strengthened policy statements.

EirGrid is available to collaborate with the planning authority and to provide expert and focused input into the revision of the Draft 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.