

Forward Planning Unit,
Development Plan Review,
Louth County Council,
Town Hall,
Crowe Street,
Dundalk,
Co. Louth
A91 W20C.

22 December 2020

Re: Submission on Draft County Development Plan

Dear Sir/Madam,

EirGrid Group welcomes the opportunity to make a submission to the Draft Development Plan and requests that this submission is taken into consideration in the drafting of the 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 Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Region. The Strategic Energy Grid is dealt with in Chapter 10 of the RSES and a number of Regional Policy Objectives are set out relating to electricity infrastructure in the Region.

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.

EirGrid Comments

EirGrid welcomes the commitment in the Draft Development Plan to preparation of a Sustainable Energy Action Plan for the county. In addition, EirGrid supports Policy Objectives IU44 to IU50 regarding energy efficiency, reduction of greenhouse gases and support for renewable energy sources.

EirGrid submits the following observations related to specific Policy Objectives of the Draft Development Plan.

Chapter 10 – Utilities

Consideration of energy policy is set out in section 10.5 of the Draft Plan.

- **Policy Objective IU 69**

To ensure that development proposals for energy transmission and distribution infrastructure follow best practice with regard to siting and design. Proposed high voltage overhead lines shall as far as possible seek to avoid areas of sensitivity. Where avoidance is not possible, full consideration shall be given to undergrounding the lines where technically feasible, economically viable and environmentally appropriate.

- **Policy Objective IU 70**

To require the under-grounding of electrical cables within new residential, commercial or civic developments. Where existing, and proposed high voltage lines traverse new residential, commercial or civic developments, these should be re-located under-ground where technically feasible.

Any planning application for renewable energy development whether by EirGrid or otherwise, will be subject to the planning process including detailed consideration of potential impacts on environmental, visual, cultural, residential and any other relevant issues.

With regard to the removal and under-grounding of overhead power lines in urban areas, EirGrid considers that this objective is overly restrictive on its operations as it is not always possible to place cables underground for a variety of reasons. EirGrid requests therefore that Policy Objectives IU69 and IU70 are removed.

EirGrid carefully plans its options and sites for new transmission grid infrastructure based on a careful consideration of a wide range of issues. The final option for any line is a carefully considered balance of technical, environmental and landowner considerations. Where it is not possible to avoid using overhead lines EirGrid will always document the reasons why.

EirGrid suggests that the following Regional Policy Objective from the Regional Spatial and Economic Strategy for the Eastern and Midlands Region is inserted into the Draft Development Plan:

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.*

Conclusion

The development of the transmission grid 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. 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.

EirGrid is available to collaborate with the planning authority and to provide expert and focused input into the finalisation 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 Draft Development Plan and looks forward to further engagement.

Enclosures (links to website)

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