Our Case Number: ABP-314724-22

Planning Authority Reference Number:

An Bord Pleanála

Eirgrid
The Oval
160 Shelbourne Road
Ballsbridge
Dublin 4
D04FW28

Date: 13 December 2022

Re: Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order [2022]
Metrolink. Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed Railway Order and will take it into consideration in its determination of the matter.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions/observations received in relation to the application will be made available for public inspection at the offices of the relevant County Council(s) and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime, please contact the undersigned. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

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Niamh Thornton
Executive Officer
Direct Line: 01-8737247

Teil	**Tel**	(01) 858 8100
Glao Áitiúil	**LoCall**	1890 275 175
Facs	**Fax**	(01) 872 2684
Láithreán Gréasáin	**Website**	www.pleanala.ie
Ríomhphost	**Email**	bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

www.eirgrid.com
An tUbhchruth, 160 Bóthar Shíol Bhroin
Droichead na Dothra, Baile Átha Cliath 4, D04 FW28, Éire
The Oval, 160 Shelbourne Road
Ballsbridge, Dublin D04 FW28, Ireland
Fón / Telephone +353 1 677 1700
R-phost / Email info@eirgrid.com

The Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902.

25 November 2022

Re: Application by the National Roads Authority (operating as Transport Infrastructure Ireland) for the Railway (Metrolink–Estuary to Charlemont via Dublin Airport) Order [2022]
Ref: ABP-302010-18

Dear Sir/Madam,

EirGrid plc., notes referral of application under Section 37(1) of the Transport (Railway Infrastructure) Act 2001 (as amended and substituted) ("the 2001 Act") for the Railway (Metrolink–Estuary to Charlemont via Dublin Airport) Order [2022].

EirGrid, plc. also notes its identification as prescribed body specified by An Bord Pleanála and a Designated Body specified by the Minister for Transport under Section 39A of the 2001 Act and wish to make a submission in respect of the Railway Order.

EirGrid acknowledges that the proposed scheme is a key objective of Government to create a sustainable public transport system which is identified as assisting Ireland in meeting its climate change commitments of reducing its greenhouse gas (GHG) emissions by 51% by 2030 and reaching net zero no later than the year 2050 in line with Climate Action Plan 2021.

As such, EirGrid acknowledges the objectives of the scheme and the rationale for the proposed development design. EirGrid also advises An Bord Pleanála that it has been involved with the project from a power system planning perspective prior to submission of the Railway Order application.

EirGrid's Statutory Function

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 grid 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, as TSO, 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, bringing power from where it is generated to where it is needed throughout Ireland. The transmission grid feeds the lower voltage distribution network, which supplies electricity to homes, businesses, schools, hospitals, and farms. The transmission grid also supplies power directly to large energy users around the country where the amount of power required is too large to be supplied via the distribution network. .

Shaping our Electricity Future

EirGrid's publication 'Shaping our Electricity Future - A Roadmap to achieve our Renewable Ambition'[1] provides an outline of the key developments from a networks, engagement, operations and market perspective needed to support a sustainable transition to at least 70% renewables on the electricity grid by 2030 – an important step on the journey to 80% and to net zero by 2050.

Of particular note in respect of the proposed Metrolink development, the Roadmap has identified significant additional capacity needs in the electricity infrastructure in the Dublin City area and in North County Dublin area to accommodate forecasted growth of electricity demand and generation.
The projected demand growth in these areas are driven by a number of factors including new planned residential and commercial developments, electrification of heat and transport and connection of large energy users.

[1] https://www.eirgridgroup.com/site-files/library/EirGrid/Shaping_Our_Electricity_Future_Roadmap.pdf

In addition to the demand growth, the Dublin City area and the North County Dublin area have seen a significant interest in connection of substantial amounts of new renewable generation, both offshore wind generation and solar generation. Both the demand growth and the increase in generation connections drives the requirements of additional capacity needs in the electricity infrastructure for these areas.

Long-term demand for electricity in Ireland is forecast to increase significantly due to the anticipated expansion of large energy users and the electrification of heat and transport, in support of government ambitions for low carbon heat and transport. The Metrolink Project, which entails the electrification of transport, is one example of demand growth in this area. This results in a requirement for significant expansion, reinforcement and upgrading of the existing electricity transmission grid in the Dublin City and the North County Dublin area . The requirement for new electricity infrastructure will include both electricity stations and circuits.

Collaboration with ESB Networks and Distribution Customers

EirGrid, as the Transmission System Operator of Ireland, and ESB Networks, as the Distribution System Operator of Ireland, work collaboratively to ensure that needs of existing and future transmission and distribution customers such as Metrolink are met. This includes planning the development of transmission interface stations, and associated circuit connections. A transmission interface station is a point of connection between the transmission and distribution system or directly connected transmission customers. A primary function of these stations is to facilitate power flows between the transmission and distribution systems.

As part of feedback to the consultation to Shaping our Electricity Future, the DSO has highlighted EirGrid emerging needs for additional transformer capacity at new transmission interface stations in the Dublin area. This capacity is needed to accommodate forecast growth of electricity demand in the distribution network. In addition to the new transmission interface stations, EirGrid has identified approximately major strategic electricity infrastructure projects that will require to be undertaken in the greater Dublin area by 2030. These projects are currently at different stages of project development and they all represent an integral requirement of delivering a secure and sustainable transition to a low carbon electricity future.

Interaction with Planned and Proposed Transmission Projects

The proposed scheme has significant interaction with the existing and planned transmission grid developments in the project area. The existing and planned electricity infrastructure are strategically

important for the safe, secure and reliable supply of electricity to customers in the both the Dublin City area and the North County Dublin area.

It is inevitable that there will be a degree of impact on the transmission grid as a result of the construction and operation on the Metrolink Project. EirGrid seeks to ensure that such impacts are addressed and mitigated to the greatest extent feasible in order to ensure that Government national and regional transportation objectives for the transmission grid can be met.

There may be substantial construction and operational impacts on the existing and planned transmission grid which need to be addressed and mitigated. Therefore, it is imperative to ensure that the provisions of Government policy and objectives as they relate to the existing and planned transmission grid are upheld and protected, to ensure continuing high standards of safety, security and reliability for electricity users and to protect the investment being made in the development of the transmission grid.

TII has engaged with EirGrid in relation to its proposals and its likely impact on the transmission grid. More broadly, TII and EirGrid have engaged at a national level in order to ensure the development of both transmission and transport infrastructure development occurs in a manner that avoids impacting negatively on the other, giving effect to Government objectives related to both transport and electricity infrastructure.

EirGrid acknowledges that many of the issues that are of concern to EirGrid, as Transmission System Operator, are of a technical or engineering nature that are most appropriately addressed and resolved ahead of the detailed design process. Therefore, EirGrid would welcome consideration by the Board of the application of appropriate, robust conditions, where such an approach is considered acceptable to the Board, in the event that the Board authorise the Railway Order.

Conclusion

As outlined above, EirGrid is cognisant of the strategic national importance of the Metrolink scheme in the context of Government policy and objectives. However, EirGrid expect that the construction and operation of the Metrolink project could, at a design level, impact or interact with the existing and planned transmission grid, the expansion of which is also a key Government policy.

EirGrid therefore requests An Bord Pleanála to ensure that the proposed development can proceed complementary to safeguarding the strategic function, safety and continued efficient operation of the

transmission grid, including planning for future national improvements in accordance with separate but interconnected Government objectives.

EirGrid considers that the issues identified can be best addressed and resolved through adequate and appropriate engagement between EirGrid and TII, and agreement of detailed design and methodologies in the post-consent phase. It is of imperative importance, however, that such engagement occurs, prior to the commencement of any development. EirGrid therefore requests that this is ensured by way of the provision of adequate and robust Condition(s) of Approval by An Bord Pleanála, should it be minded to approve the proposal.

EirGrid trusts that the foregoing comments prove of assistance to the Board in dealing with this matter. Should you have any further queries in respect of this submission please contact the undersigned.

Yours sincerely

Tomás Bradley
Senior Lead Planner
tomas.bradley@eirgrid.com