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Topic Infrastructure - Sustainable Movement – Transportation **Submission**

Thank you for this opportunity to make a submission to the Pre-Draft Local Area Plan for Arklow.

EirGrid is the Irish electricity Transmission System Operator (TSO), with a statutory mandate to ensure a secure and reliable transmission grid, now and in the future. The transmission grid refers to the higher-voltage grid that serves as a backbone to the lower-voltage distribution grid operated by ESB Networks.

This submission relates to existing and planned grid infrastructure within and extending from the LAP area, in particular focussed on the existing Arklow 220 kV Substation, as highlighted in light blue on the LAP zoning map.

EirGrid has identified a need for the electricity network in the Arklow area – and indeed the Wicklow area and wider region - to be reinforced and strengthened to facilitate a range of demands over the lifetime of the forthcoming Local Area Plan. This forecasted demand relates to new residential and commercial loads, to facilitate the electrification of the heat and transport sectors, and to facilitate the planned connection of renewable energy onto the grid network from both onshore and offshore sources. These strategic needs arise from the Government's Climate Action Plans 2023 and 2024.

Outlined in more detail below, two key proposed developments occur within or in the vicinity of the LAP area:-

Arklow Station Redevelopment

Arklow 220 kV Substation is nearing its end of life and requires comprehensive redevelopment. In addition, it requires expansion as it has insufficient capacity for known future connection needs, which include projects that enable offshore wind development. The solution, which is currently being explored by EirGrid, will cater for all current and known future transmission needs at the planned expanded Arklow substation. A consent application is expected to be submitted in 2025 and the delivery of the project will be over multiple subsequent years. Given the stated need for the project, EirGrid considers that the planning, consenting and construction of the Arklow Station Redevelopment will occur in whole or in part within the area and lifetime of the forthcoming LAP.

The lands of the existing Arklow 220 kV Substation are currently zoned "Public Utility" under the Arklow & Environs Local Area Plan 2018-2024. The zoning objective is "To maintain lands providing services infrastructure" with the provision "to allow for lands to be designated for public utilities such as waste water treatment plants, large ESB substations, gasworks etc". Also in the current LAP, the Public Utility zoning denotes "the provision of necessary infrastructure", and EirGrid would endorse the use of the term "necessary" – the provision of grid infrastructure by EirGrid is not speculative nor profit-led.

In this regard, EirGrid also notes the provisions of Section 16.2.1.7 of the Wicklow County Development Plan 2022-

2028 which addresses "Electricity Transmission and Distribution". This acknowledges that "In order to facilitate the expansion in electricity generation installation, particularly wind farms, the grid itself will require development and expansion". The Plan makes reference to the 3 existing transmission circuits in the county, noting that these are strategic pieces of infrastructure which require to be protected from inappropriate development in their immediate environs, "and that their scope for development is maintained". EirGrid respectfully submits that this protection and provision for development and expansion should also extend to substation infrastructure, particularly in this case including Arklow 220 kV Substation.

While no specific option for the expansion of the substation has been confirmed by EirGrid, given that the existing substation is constrained to the east by the public road, and to the west by a belt of mature vegetation, an obvious area for expansion is into undeveloped lands located immediately to the south of the existing substation. Those lands, though undeveloped, are currently zoned "RE Existing Residential". The zoning objective of the current LAP, and indeed the provisions for Existing Residential within the County Development Plan (Objectives CPO 6.21-6.25), clearly provide for sustainable development on such zoned lands; this includes both residential development and non-residential uses including utility installations (our emphasis in bold).

Having regard to all the above, it is EirGrid's submission that it is critical that the lands currently zoned RE immediately to the south of Arklow 220 kV Substation are specifically endorsed for redevelopment and expansion of the electricity transmission utility installation. This might in EirGrid's view best occur by way of a Specific Objective of the LAP for the redevelopment and expansion of the existing substation, rather than solely by way of zoning objective(s).

Arklow-Ballybeg-Carrickmines Capacity Needs Project

This project involves the upgrading of the existing Arklow-Ballybeg-Carrickmines 110kV circuit to 220kV operation; this will also involve the construction of a new 220kV/110kV substation in Ballybeg (situated to the west of Wicklow Town and the M11) to accommodate future capacity in the area (noting this is outside the Arklow LAP area). A consent application is expected to be submitted in 2025 and the delivery of the project will be over multiple subsequent years. EirGrid notes that the existing circuit, and its potential for development, is specifically referenced in Section 16.2.1.7 of the Wicklow County Development Plan, as referred to above – termed in the Plan as "Strategic Infrastructure Corridors". EirGrid considers it entirely beneficial for those provisions of the County Development Plan to be reiterated in the forthcoming LAP insofar as it concerns existing and planned linear grid infrastructure circuits in the LAP area and immediate vicinity.

Having regard to all the above, as part of this plan-making process, or indeed outside of this process, EirGrid advises Wicklow County Council that it would be delighted to meet and discuss any matters that the Council might wish regarding the planned enhancement of electricity transmission infrastructure, both in or proximate to the LAP area, and within County Wicklow and surrounding areas as whole.

For the purposes of the LAP, and having regard to Objective CPO 16.18 of the Wicklow County Development Plan 2022-2028, EirGrid requests the provision of a specific Objective in the forthcoming LAP as follows: "To support the development and expansion of the electricity transmission and distribution grid in the Arklow area, and in particular having regard to EirGrid's Arklow Station Redevelopment project and Arklow-Ballybeg-Carrickmines Needs project, including the development of new lines, pylons and substations as required".

EirGrid again thanks Wicklow County Council for taking this submission into consideration at this early step in the plan-making process, and we reiterate that we will make ourselves available at any time of the convenience of the Council and its officials to discuss any matter of grid infrastructure development in the LAP area, and the County as a whole.