Chambers Ireland
Advancing business together



Consultation on the Draft Transmission Development Plan 2026-2035

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About Chambers Ireland

Chambers Ireland is an all-island business organisation with a unique geographical reach. Our members are the Chambers of Commerce in the cities and towns throughout the country – active in every constituency. Each of our member Chambers is central to their local business community and all seek to promote thriving local economies that can support sustainable cities and communities.

Key Points

- It is critical that the scale of investment in the transmission system translates into a secure and reliable electricity supply at a cost that supports business competitiveness.
- For major projects, a concise explanation should be provided of the system need being addressed and the expected benefit to the transmission system.
- The significant regional presentation in the draft TDP should be built on by explaining how planned investment is expected to support changing demand and generation requirements over the life of the TDP.
- Continued capex and opex investment in the transmission network will be essential to meeting the State's climate targets, while ensuring that access to electricity does not constrain economic growth across the regions.
- For offshore development, a clear link should be indicated between offshore connections, associated onshore works and the wider transmission infrastructure required.
- Where several projects contribute to the same system need, these investments should be explained in terms of how they interact and the wider system benefit they are expected to provide.
- The interactive map and supporting material should be developed to make the purpose, location and expected timing of planned investment readily understood.
- Where flexibility, storage, or other alternatives have informed the preferred approach, a proportionate explanation should be provided of how these have been considered.
- Delivery and energisation timeframes should continue to be provided with clear information on and significant dependencies within the respective roles of all stakeholders.
- Where delivery depends on planning, consenting or other State infrastructure, these dependencies should be clearly identified, alongside the relevant public bodies where appropriate.

Our Perspective

A transmission network that is delivered effectively will support businesses and encourage balanced regional development by enabling housing and ensuring security of supply across the country. Tied to this is affordability[1]; all factors are increasingly becoming practical determinants of where businesses can locate and where planned development can proceed. Taken together, they have a direct bearing on the competitiveness of businesses and the viability of new investment.

Consistent with international trends showing ever-increasing digitalisation and consequent demand for electricity, the State's transmission system will be required to absorb more renewable generation while transport, heating and energy-intensive industries become increasingly electrified. The draft Transmission Development Plan (TDP) will be critical in providing sufficient usable capacity and system capability, in the right locations, while maintaining security of supply and containing costs for consumers and businesses. Accordingly, the programme should be interpreted as a statement about the economic and spatial capacity it requires to deliver over the next decade. These are significant challenges that underline the importance of planning beyond immediate requirements and making best use of the investment that is now available.

The necessary and significant investment provided through Price Review 6[2] reflects the demands that will be placed on the electricity system over the coming years.[3] This level of investment will

[1] As exemplified by energy security being a top challenge in our latest business sentiment survey:https://chambers.ie/wp-content/uploads/2026/11/EES2027-Report-1.pdf; infographic showing the Irish results: https://mcusercontent.com/84fe1c4253882df868c3a6781/images/a873aa8b-f71b-0d40-5344-0f7dfe7c310a.png.

[2] http://cruie-live-96ca64acab2247eca8a850a7e54b-5b34f62.divio-media.com/documents/CRU2025193_-_Price_Review_Six_-_Final_Determination_-_Summary_Paper.pdf; and https://cruie-live-96ca64acab2247eca8a850a7e54b-5b34f62.divio-media.com/documents/CRU2025197_-_Price_Review_Six_-_Final_Determination_-_Regulatory_Framework_Paper.pdf.

[3] The final framework provides baseline expenditure of €13.8 billion for EirGrid and ESB Networks for 2026–2030, with scope for investment of up to €18.9 billion.

be required to accommodate the additional housing and wider economic development that will need to increase consistent with the expected trends in population growth[4]. Such requirements will continue to grow as the National Planning Framework[5] and National Development Plan[6] are implemented and if facilitated effectively, such investment will translate into additional usable capacity in the locations where that future growth is planned.

Furthermore, the grid will be fundamental to the State's ability to decarbonise and meet its binding climate targets. With 80%[7] of electricity demand targeted to come from renewable sources by 2030, generating renewable electricity is only part of the equation. Realising the considerable opportunity off our coasts in terms of offshore development will depend on a network that can efficiently bring that electricity from where it is generated to where it is needed across the country. This is in part dependent on the bottlenecks in the planning system which - despite reform[8] – still exist.

Decisions on transmission infrastructure taken now will shape what the electricity system can accommodate for decades to come and the draft TDP should therefore provide sufficient headroom for needs that will continue to evolve. Network planning must therefore keep pace with, and support, the State's wider plans for growth.

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[4] Recently available data from the Central Statistics Office indicates population growth under all three migration scenarios, from 5.184 million in 2022 to between 5.734 million and 7.005 million by 2057: https://www.cso.ie/en/releasesandpublications/ep/p-plfp/populationandlabourforceprojections2023-2057/

[5] https://assets.gov.ie/static/documents/18ffa1a7/1_National-Planning-Framework-First-Revision-April-2025.pdf

[6] https://assets.gov.ie/static/documents/NDP_Review_document_-_updated_in_use.pdf

[7] https://www.gov.ie/en/department-of-climate-energy-and-the-environment/policy-information/electricity/

[8] The Planning and Development Act 2024 introduced wide-ranging reforms to the State's planning system, including statutory decision-making timelines, reform of judicial review, stronger alignment between national and local planning policy, and the establishment of An Coimisiún Pleanála. Key policy reforms are listed here: https://www.gov.ie/en/department-of-housing-local-government-and-heritage/publications/key-policy-reforms-planning-and-development-act-2024/

Questions

Do the transmission investments and timelines outlined in Appendix E and Section 5 of the TDP 2026-2035 adequately meet future system needs including in the North-West? Is the information clear and transparent enough to assess investment distribution?

The project list is substantial and demonstrates the scale and breadth of investment being delivered on a regional basis. The regional totals are a useful entry point and could be complemented by a clearer explanation of the principal system needs being addressed and the capability expected from the relevant projects. Given that the TID is updated on a quarterly basis, it is positive that updates to the project delivery timeframes will be actioned so that transparency is accommodated.

The context within which the programme is being planned is also changing. This is apparent when taking into account the adopted spatial plans, the location and associated requirements of housing and the credible employment growth that can form part of the evidence used to anticipate future demand across the transmission network.

This is highlighted in the revised National Planning Framework which anticipates approximately one million additional people over the next 14 years and targets housing delivery of approximately 50,000 additional homes per year in the same period. The subsequent national housing-growth guidelines translate that national requirement into planning figures applicable at the local authority level. Additionally, the updated National Development Plan commits €275.4 billion between 2026 and 2035 which includes the investment intended to support housing and energy infrastructure. It would therefore be helpful for the final TDP to explain how plan-led demand arising from adopted national, regional and local policy is reflected in the planning assumptions stipulated in the TID. Making that relationship more visible would support coordination between planning throughout the grid and the growth the State is projected to accommodate.

The regional analysis usefully explains that different parts of the system face different combinations of demand growth, renewable connections, changing power flows, security

requirements and ageing assets. The final plan could build on this by indicating for each region the principal needs expected over the ten-year horizon and the extent to which projects are anticipated to address them.

This is particularly relevant in regions with strong renewable resources and comparatively lower existing demand. Planning at the national level can consider both the transfer of electricity towards areas with established demand and the potential for suitable new demand to locate closer to generation. Presenting this in terms of system capability would further provide transparency while retaining EirGrid's evidence-based approach to network development

Does the TDP 2026-2035 provide sufficient evidence that the proposed transmission investments align with the NECP as required by S.I. 227/2022? Should any additional information or analysis be included particularly on NECP climate targets?

The draft plan establishes the policy direction with references to the NECP and EirGrid's scenario and system-needs work, and explains how demand and generation forecasts influence development within the network. An additional explanation linking those assumptions to the principal transmission needs and project groupings would make the alignment easier for non-technical stakeholders to follow.

The additional assessment would not need to constitute extensive modelling or be too complex. It could summarise the central planning scenario, the principal sensitivities and the implications of material changes in assumptions where they arise. It would also be useful to distinguish infrastructure associated with 2030 targets from the reinforcement likely to be required later in the 2035 horizon and to show where offshore connections rely on related works onshore.

Communicating the relationship between the work being undertaken and advancing the State's progress regarding the Climate Action Plan should be a core focus area. Initiatives such as the following could help towards that aim: a regularly updated climate-and-capacity statement setting out the relevant policy targets; the generation, demand and electrification assumptions used; the transmission needs as identified under those assumptions; the projects/groups of

projects intended to address them; and the main residual dependencies. This would complement the plan's existing policy references and help stakeholders understand that relationship.

Does the revised format of the TDP 2026-2035 including the interactive map and stakeholder-focused changes present the plan in a clear and accessible way? Are there any further improvements you would like to see to the TDP's format or presentation?

The interactive map will be useful as a way of effectively providing information regarding local projects to businesses. This is easier to follow than a single national project schedule and is detailed enough for consumers and businesses to understand. Linking the statutory plan with the more frequently updated Transmission Infrastructure Delivery (TID) report is also positive as it enables the TDP to set the overarching framework and direction while updating it on a quarterly basis will help ensure movement through the project lifecycle. This will be important in terms of disseminating information to businesses regarding local projects in a transparent manner.

To help provide greater transparency, changes to forecast dates should retain a brief explanation and the previous baseline so that the direction of travel remains visible.

TDP 2026-2035 introduces a new approach to presenting offshore transmission projects in Section 4. Does the new section provide sufficient clarity and transparency regarding offshore transmission development?

The new section is effective at distinguishing the unique arrangements involved with offshore development compared with onshore development, as well as the interaction it has with several interdependent areas[9].

[9] E.g a non-exhaustive list includes consenting and the sequencing of generation projects.

A central question for stakeholders is how offshore electricity will be connected and transported through the onshore system when it becomes available. Section 4 could therefore include an integrated offshore-to-onshore dependency map with a short explanation of how offshore scenarios are reflected in the wider transmission portfolio. This would build on the new section and help stakeholders assess how offshore and onshore development are being planned together.

The section could show the relationship between each offshore phase, its grid connection, the onshore nodes involved and any wider reinforcements required to move electricity beyond the landing point. Where dates depend on policy, procurement or consenting decisions, identifying those dependencies would provide useful context for the indicative transmission milestones.

A simple programme view would further improve transparency. It could identify the principal offshore and onshore components, the body responsible for each component, the next key decision or consent, and the current expected energisation range. This would show how EirGrid's offshore and onshore planning fits within a wider programme in which each stakeholder has separate distinct responsibilities.

Does Section 2 of the TDP 2026-2035 sufficiently demonstrate how demand response energy storage and other alternatives to network expansion have been considered in line with S.I. 227/2022? Is any additional information required?

The role of flexible solutions - including storage in addition to demand response measures - should be considered in the wider context of the energy transition and achieving our climate targets. The electricity system will increasingly be required to integrate significantly higher levels of renewable generation while supporting the electrification of traditionally carbon-intensive sectors such as heating and transport. Accordingly, effective use of flexibility and storage will be an increasingly strategic part of how the system is planned and operated, alongside the continued development of the transmission network.

This is particularly important as the share of variable renewable generation increases. A range of flexibility measures will be necessary to help the system make better use of renewable electricity when it is available, along with managing periods of higher demand which will increasingly vary over time. Their importance should therefore extend beyond consideration simply as alternatives to individual investments within the network.

Section 2 provides a useful account of the role of these measures and recognises that they form part of a wider suite of options available to EirGrid. The TDP could build on this by providing a strategic account of how flexibility, demand response and storage are expected to contribute to the development of the transmission system over the ten-year period and how their role interacts with planned network investment.

Furthermore, the objective should be to develop the network and make greater use of these measures in a complementary way to existing and new infrastructure, so that they can be used efficiently. This will be critical to maintaining security of supply and integrating renewables onto the grid in all regions of the State.

In that context, greater visibility on how these options inform major investment decisions would be useful. Where appropriate, the TDP should identify the system need being addressed, the flexible options considered, and whether those measures can address the need directly or operate alongside a longer-term network solution.

Do you have any other suggestions to improve the TDP?

The final TDP should identify material external dependencies for major projects, such as statutory consent, access to land, coordinated outages, or project sequencing. Naming the responsible category of body where appropriate would help the CRU and stakeholders distinguish decisions made regarding transmission planning from dependencies managed elsewhere.

The wider State apparatus should ensure that planning and consenting bodies have the resources, expertise and coordination arrangements required to assess infrastructure properly within predictable processes. This does not imply any reduction in consultation, environmental

assessment, or regulatory scrutiny. Instead it should acknowledge that the State's own arrangements need to support the infrastructure requirements arising from the objectives of the NDP, the NPF and their importance in terms of actioning national housing and economic policy in addition to meeting our climate targets.

Security of Supply and affordability

The programme's contribution to a secure and economically sustainable system is an important part of its value.[10] A portfolio-level statement could build on this by explaining how the programme is expected to reduce material network risks and improve its overall resilience.

Affordability can be addressed in the same way, even though the TDP is not the tariff-setting instrument and network expenditure is assessed through the CRU's regulatory process. Nevertheless it can explain where solutions reduce whole-system costs and excessive renewable curtailment or improve the use of existing assets. This would aid public understanding of the long-term value of the programme without extending the TDP beyond its proper role.

[10] The TDP already describes security, resilience and renewable integration as project drivers.