

# Report on Public Consultation on Transmission Development Plan Northern Ireland 2023-2032

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## Table of Contents

|   |    |
|---|----|
| Introduction .....                                  | 3  |
| Purpose of the Transmission Development Plan.....   | 6  |
| Responses to the Consultation .....                 | 7  |
| Summary of feedback – TDPNI 2023-2032 .....         | 8  |
| Public Engagement .....                             | 8  |
| Strategic Planning/Plan-led Approach .....          | 9  |
| Interconnection.....                                | 10 |
| Delivery of Projects for Renewable Integration..... | 13 |
| Innovation .....                                    | 14 |
| Tomorrow’s Energy Scenarios .....                   | 15 |
| Grid Delivery .....                                 | 17 |
| Dispatch Down .....                                 | 22 |
| Project Websites .....                              | 24 |
| Co-ordination with the Gas Network.....             | 25 |
| Projects Not Included in TDPNI 2023-2032 .....      | 25 |
| Contestability .....                                | 26 |
| Offshore Policy.....                                | 27 |
| Connecting Future Renewable Generation .....        | 27 |
| SONI Resourcing.....                                | 28 |
| Shaping Our Electricity Future .....                | 29 |
| Planning .....                                      | 29 |
| Community Benefit .....                             | 31 |
| Compensation.....                                   | 31 |
| Summary of feedback – SEA and HRA .....             | 33 |
| Abbreviations.....                                  | 51 |
| Glossary.....                                       | 52 |

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## Introduction

SONI is the electricity transmission system operator for Northern Ireland.

Our role is to operate the transmission system, or the electricity grid as it's better known, every minute of every day to ensure electricity can flow from where it is generated to where it is needed at the lowest price possible for the Northern Ireland consumer.

The transmission grid safely brings power from generators and sends it to NIE Networks' distribution system. They then supply electricity to every home, farm, community, and business in Northern Ireland.

However, SONI also has the crucial responsibility of planning and delivering a transformation of the power system to enable a cleaner energy future. This includes interconnection to neighbouring grids and running the wholesale electricity market.

In this respect, SONI has a crucial role to play in the implementation of Northern Ireland's Energy Strategy and climate change legislation which sets a target of an average of at least 80% of our electricity coming from renewable sources by 2030.

The transmission grid and its infrastructure need to be made stronger and more flexible to transport the increases in clean energy generation which we expect to see this decade to support this target.

This infrastructure upgrade is the most significant in its scale and impact since rural electrification and it is a mission-critical step on the journey to net-zero carbon emissions by 2050.

Delivering this transformation to enable a cleaner energy future is our defining mission.

The projects outlined in our Draft Transmission Development Plan will ensure that the transmission grid is fit for the future, providing for Northern Ireland's environmental, societal and economic aspirations. They are critical enabling infrastructure in the realisation of the Northern Ireland Energy Strategy and Climate Change Act (Northern Ireland) 2022.

This document includes the views and feedback received from the energy industry and other key stakeholders during the consultation process and our responses to them.

## Context

Electricity systems across the world are changing. At SONI, we plan the grid for the benefit of future generations. The Northern Ireland Energy Strategy ‘Path to Net Zero Energy’ and Climate Change Act (Northern Ireland) 2022 set an ambitious and challenging legal target that 80% of all electricity consumed in Northern Ireland must come from renewable sources by 2030.

In Northern Ireland, we have made significant progress so far. The all-island transmission system was among the first regions in the world to have 75% of electricity flowing through the grid from non-synchronous sources i.e. renewable generation and interconnector imports at any one point in time. In 2023, approximately 50% of our electricity in Northern Ireland came from renewable sources.

SONI is committed to delivering the transformation required to make the electricity grid stronger and more flexible to transport the increases in clean energy generation which we expect to see this decade.

SONI has a licence as Transmission System Operator which governs what we do and how we do it<sup>1</sup>. We are regulated by the Utility Regulator (UR), and every single network development project is subject to a funding decision by the UR before it can proceed. This process requires us to clearly demonstrate the need for any network development, in response to forecast changes in demand and planned changes in generation, as well as the condition and suitability of existing infrastructure.

SONI does not own any electrical infrastructure – the transmission system is owned by NIE Networks, who are responsible for constructing the network development projects led by SONI. Project timelines are determined by our own network development process and design work with NIE Networks as well as planning consents, procurement of equipment, and regulatory approvals.

The electricity system is complex and has a wide-ranging stakeholder landscape. While there is a strong consensus on the importance of decarbonising our society and economy, it is important to recognise there are different, overlapping and sometimes competing priorities.

As the Transmission System Operator, SONI has to work with our stakeholders to find balanced solutions to the opportunities and challenges presented by the energy transition.

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<sup>1</sup> <https://www.uregni.gov.uk/files/uregni/media-files/SONI%20TSO%20Consolidated%20Feb%202019.pdf>

In this respect, it is vitally important that we acknowledge that our electricity system is largely funded by consumers through their bills. As such, it is imperative that we deliver this transformation as quickly as possible while ensuring consumers have the high quality and reliable electricity supply at the least possible cost.

The projects outlined in this document will ensure the transmission grid is fit for the future, to help reach our ambitious energy targets and provide for Northern Ireland's environmental, societal, and economic aspirations.

Whether it's local communities, businesses, landowners, civic society organisations or our partners in the electricity industry, we understand that our stakeholders must be at the heart of our plans; we cannot deliver these plans alone. We are grateful for those consultees who responded to the draft Transmission Development Plan and associated Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA).

### **Putting communities at the heart of the energy transition: SONI's Engagement Model**

Before we develop or add to the grid, we work with those who may be affected by our plans. Grid development is a consultative process, and we aim to work alongside local communities, landowners and businesses to deliver this.

SONI have a 3-Part Process for Grid Development process which puts public engagement and consultation at the heart of how we upgrade and improve the transmission grid. On each project, we want to engage with the community, elected representatives and other stakeholders with a goal of finding the best possible solution, and key to this is understanding local concerns and working to enhance public acceptance of increased transmission infrastructure.

Our 3-Part Process means we often engage with local communities years before a planning application is submitted, offering multiple opportunities to shape our plans. While our existing model goes far beyond what is required by statutory planning requirements for Pre-application Community Consultation, we want to redouble our efforts to ensure local communities are at the heart of the energy transition. That is why we engaged and consulted on an enhanced Public Engagement Model which was published in 2024.

In order to provide a balanced solution, we aim to ensure that our approach minimises costs to the consumer while also contributing to Northern Ireland's clean energy targets and supporting security of supply. By working with these principles at our core, we can transform the power system to deliver for consumers and our economy, while keeping Northern Ireland's switch to clean energy on track.

Before the Transmission Development Plan (TDPNI) can be approved, SONI is required to consult on the draft TDPNI in order to capture the inputs from stakeholders.<sup>2</sup> Based on the responses to the consultation we then update the draft TDPNI where necessary and submit a consultation report alongside the updated TDPNI to the UR.

Following this, the UR is obliged to hold a further public consultation on the draft TDPNI.

This document is the report on SONI's consultation on the draft TDPNI 2023-2032. It describes the consultation process and provides an overview of the submissions received and our responses to the issues raised.

## Purpose of the Transmission Development Plan

Local and UK strategic energy policy objectives set the context for investment in the Northern Ireland transmission system to ensure security of electricity supply, competitiveness of the economy, and long-term decarbonisation of electricity supply. To achieve these strategic objectives, it is necessary to invest in the development and maintenance of the electricity transmission system.

The primary objective of the TDPNI is to describe the transmission network developments planned for the next ten years. The TDPNI explains:

- Our approach to network development;
- The drivers for investment, both policy drivers and technical drivers;
- The identified needs of the transmission network; and
- The planned network developments with expected project completion dates.

In so doing, the TDPNI raises awareness of planned network reinforcements. It is important to note that the TDPNI is neither a strategy-forming nor a policy-forming document.

## Description of SONI's Consultation Process

The draft TDPNI was posted for public consultation on the SONI website ([soni.ltd.uk](http://soni.ltd.uk)) and SONI's consultation portal ([consult.soni.ltd.uk](http://consult.soni.ltd.uk)) on 29 September 2023 enabling stakeholders to access all relevant material and make a submission in the same place.

A notification of SONI's consultation was also sent, via email, to SONI stakeholders subscribed to the [info@soni.ltd.uk](mailto:info@soni.ltd.uk) mailing list. Notification of the consultation was also publicised on SONI's social media channels. Throughout the consultation period, SONI social media channels posted several notifications in order to remind stakeholders of the submission timeline.

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<sup>2</sup> EU Directive 2019/944 (Article 51)

SONI engaged with a number of key stakeholders in advance of the draft TDPNI publication and during the consultation process through in-person briefings, email correspondence and the dissemination of a stakeholder toolkit. A number of specific engagements were delivered with industry partners, local planners, and the business community.

The consultation closed on 12 January 2024.

## Responses to the Consultation

SONI received 13 responses to the TDPNI and SEA & HRA consultations. These were from:

1. Armagh City, Banbridge & Craigavon Borough Council
2. Causeway Coast and Glens Borough Council
3. Department for Agriculture, Environment and Rural Affairs
4. Department for Communities
5. Fermanagh and Omagh District Council
6. Energia
7. ESB Generation and Trading
8. Foyle Port
9. Mutual Energy
10. North Channel Wind
11. RenewableNI
12. RES Ltd
13. National Trust

We would like to thank all parties for their responses. The rest of this report deals with the issues raised in these submissions. We have attached the 13 responses with this report. These responses are also publicly available on the SONI consultation portal at [consult.soni.ltd.uk](https://consult.soni.ltd.uk)<sup>3</sup>.

In the following sections, we summarise and respond to the submissions.

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<sup>3</sup> <https://consult.soni.ltd.uk/consultation/draft-transmission-development-plan-northern-ireland-2021-2030>

## Summary of feedback – TDPNI 2023-2032

Feedback is grouped and summarised by theme, where possible, with SONI responses to each theme included.

### Public Engagement

#### Ulster Farmers Union

*As stated, 'delivery of the six projects is possible by 2030 but is dependent on continues enabling government policy, an efficient and robust planning policy and system and both SONI and NIE Networks having sufficient resources to complete projects in a timely manner.' This viewpoint ignores the burden that will be placed on landowners and the true amount of time needed to be spent on landowner engagement has not been taken into consideration. It also does not factor in the seasonality of the farming calendar, weather or ground conditions instead suggests that work can and should be completed all year round despite impact this may have on farm businesses to complete delivery of the proposed newbuilds.*

*When SONI identify the need to commence a transmission project and are considering how best to deliver it, the impact on those living and working in the local area must be of higher priority that has been previously for the recent North South Interconnector.*

*SONI's strategy for planning the development of the grid is discussed under 5 headings:*

- *Our approach to the environment*
- *Our approach to technology*
- *Our approach to project development*
- *Our approach to planning and consenting of projects*
- *Our approach to consultation and engagement*

*UFU suggest more robust inclusion of consultation and engagement feedback under heading 5, rather than appropriate consideration.*

#### Our Response

SONI go above and beyond the minimum public engagement threshold that is set by the Planning Act (Northern Ireland) 2011. Before completing statutory Pre-Application Community Consultation (PACC), SONI's Communications and Landowner Engagement teams have already laid the groundwork within communities where a project need has been identified, often years in advance of submitting a planning application. We do this by engaging key stakeholders, landowners, and local communities through various methods of engagement activity, where we explain the needs and benefits of a project and afford the public an opportunity, where appropriate, to input into our plans.



Each of the projects in the draft Transmission Development Plan will have a communications and engagement plan that is underpinned by our 3-Part Process for Developing the Grid – each of these plans will place public engagement at the heart of transmission development. SONI is acutely aware that grid infrastructure development can be unbalanced toward rural communities and landowners, and we are consistently looking for opportunities to enhance our public engagement processes within those communities where possible. That is why we recently reviewed our Public Engagement Model through a ‘call for views’ exercise to ensure our model can make an effective and efficient contribution toward the progress of NI’s energy transition by affording stakeholders the opportunity to feed into our plans at the earliest opportunity.<sup>4</sup> We would encourage stakeholders to respond to this exercise where areas of enhancement can be identified.

## **Strategic Planning/Plan-led Approach**

### **Causeway Coast & Glens Borough Council**

*The impact of the TDPNI on the landscape of the northwest will likely be significant. Given the scale of the infrastructure upgrades proposed, and the level of energy generation development required to meet Northern Ireland's energy ambitions, the Plan could significantly alter the landscape character of the area. It would therefore be appropriate for the energy industry to undertake a robust landscape assessment and sensitivity analysis, to determine if the northwest has the capacity to absorb this level of development, prior to the adoption of the plan for the enabling infrastructure.*

*The absence of a strategic energy plan which clearly defines the implications of the [draft] TDPNI limits the conversation. There is perhaps a need for a clear discussion as to whether it is appropriate and fair for the northwest planning area to accommodate the energy generating development to serve the southeast area and beyond, given the potential for visual and general amenity impacts.*

### **Our Response**

We acknowledge the concerns of local communities, elected representatives, and local government in relation to the burden of hosting infrastructure of all types in their area. That is why we work closely with these stakeholders when developing our plans to minimise any impacts.

It is important to be clear about our role and the legal, licence and regulatory parameters within which we operate.

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<sup>4</sup> Call for Views: Public Engagement Model, SONI Consultations, URL:  
<https://consult.soni.ltd.uk/consultation/call-views-public-engagement-model>

SONI's role as the TSO is to develop the transmission infrastructure where it is needed in response to the expected development of generation and demand. As System Operator, we are obligated to offer a connection to any generator which applies to the transmission system (Licence condition 25), and we are also obliged to develop the system in order to make sure there is sufficient capacity to transmit this power (Licence condition 20). These obligations mean we have a critical role to play in facilitating the delivery of statutory decarbonisation targets. SONI does not have a role in deciding where generation or demand is situated; rather this is a matter of energy policy.

Existing energy policy has incentivised the delivery of generation where it is practical for the developers to do so. The nature of the landscape and population density in Northern Ireland means that in particular wind generation is located in the west and northwest, in rural areas. By contrast, demand and higher population density is found in the east. This means our role is to transport that energy from where it is generated to where it is used, which tends to be from the north and west towards the south and east.

We agree with the councils view that a more strategic plan for NI's energy transition would be beneficial and we are engaging with industry partners, the Department for the Economy (DfE) and the UR on this matter specifically.

New network development is absolutely critical to achieving Northern Ireland's energy targets as there is not sufficient network capacity or suitable connection points to integrate the necessary generation infrastructure. All of SONI's projects are individually subject to multicriteria assessment and a robust cost-benefit analysis, as ultimately the cost is borne by the Northern Ireland consumer, and all reinforcements must deliver value to the consumer. The preferred options for each project in the TDPNI which are being brought forward by SONI represent the best balance of cost, environmental and social impact, technical performance, and deliverability.

## Interconnection

### Mutual Energy

*The key aspect of note for MEL in the TDPNI 2023-32 is that it indicates a later completion date of 2028 for the Moyle capacity increase compared to the 2021-30 iteration of the TDP which had a 2024 completion date. We also note that the SONI Forward Work Plan 2023-24 ("FWP") refers to a completion date of 2026 but for the purposes of this response assume that the TDPNI is based on the most up-to-date information. The FWP highlights that the socio-economic welfare benefits of the project are £5.6m. We do not know the detail around how this figure was arrived at or the number of years over which these benefits accrue, but it*

*does appear to be a conservative estimate. Our own modelling suggests that a two-year delay to the project (and the associated increase to Moyle's export capability) would result in the loss of the equivalent of over £10m worth of socio-economic welfare benefits to Northern Ireland consumers...*

*...Given Moyle's position as a TSO in Northern Ireland we would be keen to work with SONI and NIE to consider the feasibility of delivery options to complete the project earlier or minimise the risk of delay. For example, completion of the project will require Moyle to engage its own expert contractors to complete 'tie in' works at its own site. Given Moyle's existing relationships and potential access to resources and the infrequency with which NIE will have undertaken this sort of new 275 kV cable project, we suggest it may be worth considering whether it could be optimal for Moyle to actually deliver this project itself. Whilst we recognise that such a non-standard approach may present its own regulatory and commercial challenges, innovative and collaborative approaches to delivery are likely to be of great benefit and necessary in meeting 2030 targets.*

### **RenewableNI**

*RNI fully supports the development of the second North-South interconnector. While it is disappointing that the delivery date had slipped by two years since the previous estimation of Winter 2023, we are aware of the planning difficulties that the project has faced. We understand this has now slipped again and is due to be completed in 2027. As this is a key project in allowing NI to achieve its 80 by 30 targets, it is crucial that this is delivered as soon as possible. A substantial proportion of current constraints of renewable generation in Northern Ireland would be removed when the North-South interconnector is complete and we therefore look forward to its construction. In our response to the last TDPNI consultation, RNI welcomed the new target date of 2024 for completion of works to allow the full integration of the 500MW export capacity of the Moyle Interconnector. Since the TDPNI 2021-2030, we are disappointed to note that this has been delayed by 4 years, and is now expected to be completed in 2028.*

### **Our Response**

Interconnection is key to minimising electricity costs, long term security of supply in Northern Ireland and to increasing our utilisation of renewable energy.

We welcome the response from Mutual Energy regarding the Moyle Capacity Increase. This project received Transmission Network Preconstruction (TNPP) approval from the Utility Regulator in March 2024 and has moved into Part 2 of our Grid development process. We will engage very closely with Mutual on this project and look forward to exploring options to expedite project delivery as much as possible along with NIE Networks.

The North South Interconnector (NSI) is a critical project for the power system across the island of Ireland and will be instrumental in ensuring Northern Ireland fulfils its energy ambitions. As the project has full planning permission, it has moved to the next phase of development. In relation to the Northern element of the NSI, SONI is engaging with the DfE to secure necessary wayleaves for the outstanding land access required for construction to commence.

To date, ESB Networks and NIE Networks have carried out site investigation boreholes, environmental and technical surveys at a number of tower locations along the route to gather information for the construction phase, to ensure compliance with the approved planning permission. At this stage, NIE Networks has nearly completed all procurement for construction and materials and should be able to commence construction in early 2025 at the latest. SONI continues to engage with landowners, local communities, and key stakeholders as the project progresses.

In considering delays in relation to specific projects, such as the North South Interconnector, it is important to understand the external dependencies, for example the granting of planning permission and the utilisation of the statutory necessary wayleave process/vesting/compulsory purchase processes, in meeting project timescales. In the case of the North South Interconnector, the project experienced significant delays in this respect.

Given the scale of new infrastructure that is required to meet Northern Ireland's renewable energy and decarbonisation goals, SONI is concerned about future timely deliverability in the absence of meaningful reform and resourcing in these critical external areas.

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## Delivery of Projects for Renewable Integration

### **Energia**

*NI is already late in developing the types of policies and supports that attract not only developers but companies active in the renewable energy supply chain. There is a considerable risk that NI remains unattractive to developers to the detriment of our 2030 climate targets and beyond. NI has developed only 70MW of large-scale renewables in the past four years at a time when at least 400MW per year needs to be delivered each year until 2030, in order to achieve the government's legislated 2030 targets. Only in one prior year (2016) has NI developed 400MW, demonstrating that with the right policies in place, NI is capable of deliver the scale of capacity needed to achieve climate goals...*

*...It's imperative therefore that a sizeable uptick in the delivery of grid capacity occurs in the coming years, to not only promote efficient project delivery in the future, but also maximise the output of existing sites (thus reducing the amount of new capacity that customers are required to fund)*

### **Our Response**

SONI recognises the challenge we face collectively as an industry in meeting the 80 by 30 target. We acknowledge the role that we play as TSO in supporting the delivery of this target and that "business as usual" will not deliver for us. Transmission grid is critical as well as the connection of new renewable generation and system service projects.

SONI has obligations under Licence Condition 20 to plan the transmission system in an efficient, co-ordinated and economical manner. We also have obligations under Licence Condition 25 to issue a connection offer to any person that applies. In recent years, we have experienced increased tension between these two obligations as a result of the "developer led" approach and the increased demand for transmission connections.

This results in a more reactive approach to connections and grid development. In SONI's assessment, this is inefficient and contributes to increased costs and timescales. By shifting posture to more of a plan-led approach working with industry, government and regulatory partners, collectively we can increase grid capacity in a proactive and more timely manner through more anticipatory investment while reducing costs and timescales for grid connections. We have reviewed and considered the changes in network development processes in Great Britain that allow for a more co-ordinated, plan-led approach to network

development and have been engaging with NIE Networks, DfE and the UR on implementation of a similar approach, suitable in the Northern Ireland context.<sup>5</sup>

SONI is also working closely with industry to identify the pipeline of renewable generation projects at as early a stage as possible. It is clear that not only is significant new renewable generation expected to apply to connect to the grid in the coming years but that most of this is of a scale that would require a direct transmission connection, as wind turbine technology has advanced to allow larger turbines with consequently larger outputs. Most of the existing wind generation in Northern Ireland is currently connected to the distribution system – and some older wind farms are expected to repower with new turbines, meaning that these may also require transmission connections.

110/33 kV Cluster substations have proven an effective method of connecting distribution-scale generation in Northern Ireland. SONI is developing an equivalent transmission cluster policy to enable a similar approach on a larger scale. We plan to engage with NIE Networks, the UR, DfE and industry on the development of this policy which we hope to consult on in 2024 prior to seeking UR approval and final implementation.

## **Innovation**

### **Energia**

*In addition to the major reinforcement works outlined in the TDPNI, it is vital that the existing network infrastructure can be leveraged to the greatest extent possible. Efforts must therefore be expedited as a matter of urgency to facilitate hybrid connections, strategically located storage, and the co-location of renewable units with storage or other technologies that can absorb surplus electricity, such as hydrogen electrolyzers. It's likewise important that the requisite market systems are put in place as soon as possible to remove existing barriers to such connections.*

### **Our Response**

The projects detailed in the TDPNI will deliver the physical infrastructure needed to modernise and decarbonise the electricity transmission system – but we recognise that this work is not enough on its own. Operational and market changes are also key to enabling an efficient, co-ordinated and clean energy system. Dynamic line rating, for example, is a technology which has the potential to increase network capacity in real-time, and with NIE

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<sup>5</sup> Winser, N. (2023) Electricity Networks Commissioner – Companion Report Findings and Recommendations. [access: <https://assets.publishing.service.gov.uk/media/64c8e85219f5622360f3c0ee/electricity-networks-commissioner-companion-report.pdf>]

Networks we plan to test this on the Magherakeel – Omagh 110 kV circuit in the near term, as discussed in our *Shaping Our Electricity Future (SOEF) Roadmap*.<sup>6</sup>

Under SOEF we have developed an Operational Policy Roadmap, which shows the operational changes we anticipate that are needed out to 2030 and we look forward to engaging with all stakeholders over the coming years on this work.<sup>7</sup>

We have worked closely with NIE Networks to remove the restriction on overinstallation of generation, paving the way for hybrid connections, which we are currently developing policy for. NIE Networks also recently consulted on connecting load to cluster substations, and we responded supporting allowing connection of batteries, electrolyzers and other such demand key to enabling the energy transition.

## Tomorrow's Energy Scenarios

### Energia

*Energia notes that the TES model 'Accelerated Model' scenario is being used to inform future needs from a grid development standpoint. Planning the grid based on scenarios in TES which are very unlikely to occur, based on the current trajectory, runs the risk of diverting grid resources and schedules from projects which are substantially more feasible in the near-term (solar, onshore etc.) in favour of offshore projects that have a high risk of delay, and in some cases no contracted route to market...*

*... Energia is of the view that a paradigm shift in grid resourcing and scheduling is required to accelerate renewable connections, and that this should be called out in the TES, as government needs to understand the scale of the challenge and the resourcing required to achieve the targets.*

### ESB GT

*ESB GT believes that there would be benefit in providing greater transparency within how the TDP is developed. Within the TDP, there is little information provided surrounding the needs case and justification for each project, in particular the use of Tomorrow's Energy Scenarios (TES), and the underlying Cost Benefit Analysis mechanism.*

*ESB GT has would appreciate further information around the use of TES within this TDP.*

*Areas where greater levels of transparency may be valuable include:*

- *The TDP was published prior to the publication of the TES. As the TES aids to inform the needs case for network investment, it would be beneficial to understand what*

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<sup>6</sup> [https://www.soni.ltd.uk/media/documents/Shaping-Our-Electricity-Future-Roadmap\\_Version-1.1\\_07.23.pdf](https://www.soni.ltd.uk/media/documents/Shaping-Our-Electricity-Future-Roadmap_Version-1.1_07.23.pdf)

<sup>7</sup> <https://www.eirgridgroup.com/site-files/library/EirGrid/Operational-Policy-Roadmap-2023-to-2030.pdf>



*information from the November TES consultation was used, or due to timing, what other information sources were used to underpin investment decisions.*

- *If the increase from three to four scenarios had any impact on the needs case for investment, for example the potential for the additional scenario to dilute investment signals.*
- *The TES outlines that a net zero energy system will happen by 2040 at the earliest. However, this does not align with [UK] 2035 decarbonised electricity network targets. Further information on how the TDP will support 2035 ambitions would enable greater stakeholder certainty.*

### **Our Response**

We are currently preparing a new Tomorrow's Energy Scenarios (TES) Needs Assessment and this will be used to inform future versions of the TDPNI.

As the TDPNI is based on the TES2020 System Needs Assessment (rather than TES itself) the recent November 2023 publication of the TES consultation has not influenced this TDPNI. However, the responses to this consultation will inform the next System Needs Assessment (SNA), which will influence future TDPNIs. All scenarios in TES NI are modelled in the SNA and the needs arising across multiple scenarios are used to inform new projects in the TDPNI. Needs arising in a single scenario only are less of a priority; if energy policy and delivery develops along the trajectory of that single scenario, such needs may be revisited, and projects developed.

The scope of the work in the TDPNI itself (and arising from TESNA2020) has informed NIE Networks' RP7 Price Control submission and will also be part of the basis of the upcoming SONI Price Control submission.

The TDPNI is a 10-year plan and does not cover 2035, although TES does and the next TESNA will consider the future of the system beyond 2030. There is currently no specific policy in place on 2035 decarbonised energy targets for Northern Ireland beyond the UK-wide decarbonisation target. The Northern Ireland Energy Strategy seeks a 56% reduction in energy related emissions by 2030, and the Climate Change Act (Northern Ireland) 2022 requires a 48% reduction in total Green House Gas (GHG) emissions in NI by 2030 and net-zero by 2050.

We are working with the DfE and UR to develop the most efficient plans to meet 80% renewable generation by 2030 and this will be reflected in future TDPNI documents.



## Grid Delivery

### Energia

*Energia notes the Renewable NI response in providing a comparison of estimated completion dates from the last two TDPs for the six key projects highlighted in this TDP. Besides the sliding scale of delivery dates, two of the projects are scheduled to be completed for 2030. Given the history of delays in the total list of Asset Replacement Projects and Network Development Projects, Energia is concerned that any further delays will jeopardise the 2030 goals and inhibit the level of renewables that can be utilised. In a scenario where one or more of these key projects are delayed or an accumulation of other delayed projects, NI constraints will continue to be an inhibitor of renewable investment and also add considerable cost to the consumer.*

### ESB GT

*ESB GT believes that the TDP, in its current form, may create a risk to NI in meeting its 2030, 2035 and 2050 climate ambitions. The level of investment planned presents a potentially reactive approach towards network reinforcement. Within this, the TDP presents only five new projects and a range of existing projects which have been delayed between 1-6 years. ESB GT believes that the TDP could be enhanced if the following considerations were taken into account:*

- The future Renewable Energy Support Scheme (RESS) which is anticipated to draw large levels of new investment within NI, as represented by the successes of the RESS and Offshore RESS schemes within Ireland and Contracts for Difference programme within Great Britain (GB).*
- The need to consider repowering of existing windfarms and the potential for existing sites to expand capacity, requiring additional investment in the transmission system over the coming years...*

*... ESB GT welcomes NIE Networks and the Utility Regulators recent work on reforming the Cluster methodology to ease efficiency and better enable anticipatory investment in NI. However, there may be benefit if a similar methodology was introduced in the transmission network in order to future proof the energy system for future need and encourage investment. Anticipatory investment will be a key output of GB's Centralised Strategic Network Plan (CSNP) led by the Future System Operator, looking forward to future ET network need; enabling the safe connection of new generation on the ET network and proactive identification of future network need to reduce/prevent constraints. The importance of this was also recently highlighted by the UK Government and the European Commission whereby regulatory frameworks are being altered to support the energy transition, focusing on an approach of enabling strategic investment ahead of need. NIE Networks and the UR should consider, and consult upon, a similar approach towards anticipatory investment being undertaken by SONI.*

## **Foyle Port**

*We are however concerned that the timescales set out in the TDP are protracted and of an indicative nature only. It would be helpful to investors and other interested parties if SONI could provide a high-level schedule for each transmission project, to enable tracking of projects from one year to the next. In addition, it would also be helpful if SONI could explain how they prioritize transmission projects and what factors have been taken into consideration in relation to prioritization. Critically, we would ask that SONI engage with relevant stakeholders to manage to delivery of transmission projects at Coolkeeragh as expeditiously as possible particularly taking into consideration wider economic and system benefits that will arise through the connection of new demand and generation customers to the transmission system.*

## **RES**

*...we feel this plan is lacking detail in how it will deliver on the decarbonisation targets for Northern Ireland, as well as alleviating the significant power system constraints that are active on the power system today. The renewable industry is experiencing increasing levels of dispatch down by the continued delays in project development and construction, and even though this plan addresses some of these issues, we feel it doesn't go far enough...*

*... RES appreciates the challenges faced by both NIEN and SONI to deliver network projects and carry out maintenance work whilst maintaining a stable power system, but the piece meal approach to network development is only going to delay the decarbonisation targets due to a lack of 'big thinking'. More ambitious projects should be considered as part of this plan, including a further expansion of the 275 kV network to areas with high levels of installed renewable generation...*

*...RES considers that a more proactive strategic approach needs to be taken with network development, that future proofs the transmission system and continues the world class deployment of renewable energy in Northern Ireland. We think that steps being taken in the GB market to accelerate delivery of essential new electricity transmission infrastructure merit consideration for adoption in Northern Ireland. In GB, Ofgem has introduced the Accelerated Strategic Transmission Infrastructure (ASTI) framework, which will introduce a more anticipatory approach to transmission network investment as well as introduce other measures to streamline the process overall. The UK Government has committed to introducing a Strategic Spatial Energy Plan that will help to pave the way for consenting and delivery of optimised new infrastructure. Overall, the new measures are aimed at cutting the time required to deliver new infrastructure by 50%. We think it is time for the regulatory framework in Northern Ireland to adopt the same level of urgency...*

*... With advances in wind turbine technology, projects that RES are now developing are generally no longer suitable for connection to distribution networks. More and more, future projects will require transmission connections. It is vitally important to the delivery of decarbonisation targets that future transmission network development considers the*

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*possibility that projects will be connecting at 110 kV and the impact this will have on early-stage development and proposed substation layouts. RES is of the view that SONI should be considering how these connections can be facilitated in the future.*

*RES is of the view that SONI should be considering how these connections can be facilitated in the future... Such measures could include the extension of the existing Cluster Development Policy to allow for transmission connections and /or constructing new 110 kV substations that allows for future expansion.*

### **RenewableNI**

*RNI welcomes the publication of the SONI SOEF V1.1 which sets out the necessary upgrades required to reach 80% renewable electricity 2030. SONI's TES 2020 which was published in July 2020 noted in its opening key message 'The context of climate change is well understood and the question now is how fast society can respond to limit the damage, protecting our planet for current and future generations.' SONI identified an Accelerated Ambition scenario in TES 2020 which is now the adopted position of the NI government, i.e. 80% of electricity from renewables by 2030. This accelerated ambition needs to be reflected in the draft TDPNI. The ambition for 80% renewables is there, however, with completion dates for key network infrastructure continually being pushed back, the impression is one of slowing down rather than accelerating projects...*

*... The draft TDPNI also identifies six new build projects as key enablers for 80% by 2030, and that completion of these projects is critical to meeting and then exceeding the 2030 targets... Given the historic trends with delivery of all these projects, RNI have significant concerns with respect to the ability to deliver these key enabler projects in a timely manner. While renewable developers will share with SONI frustrations with delays in the NI planning system, SONI must be accountable for delivery against its own timelines. It is unacceptable that expected completion dates are continually pushed back without sufficient explanation. The impact of not delivering these transmission projects is fewer renewable energy projects connecting, with greater levels of dispatch down resulting in lost revenue, higher costs to consumers, and increased carbon emissions. Accelerated ambition cannot be said to be being met...*

*... We recognise that there can be inevitable delays to projects e.g. relating to planning, but we would urge that every effort be made to avoid delays to projects and we would suggest that clear reasons be given to every project that is being delayed in future.*

### **Fermanagh and Omagh District Council**

*The Council is also concerned that transmission development in NI continues to lag significantly behind the build out of renewable generation, particularly in the North West region. The largest project in the Fermanagh Omagh District, the "Mid-Tyrone" project (previously named the Omagh - Dromore third circuit), is not due for completion until 2030 and was pushed back from the previous completion date of 2029 (as detailed in the SONI*

*TDP 2020-2030). It is vital that transmission system developments keep pace with the connection of new renewable generation, otherwise constraint levels will almost certainly make future renewable investments less viable and therefore the potential carbon savings will not be realised. Due to the high proportion of distribution network (as opposed to transmission) infrastructure (particularly in the Fermanagh Omagh region), renewable energy generation is highly decentralised, small-scale and connected at distribution voltage, which limits investment in large scale, (and potentially more efficient/ cost effective/ specially beneficial) solutions.*

### **Our Response**

As explained previously in this paper, SONI recognises the role that we play as TSO in supporting the delivery of this target and that "business as usual" will not deliver for us. Transmission grid is critical in delivering the 80 by 30 target and reducing network constraints, and through our licence obligations, we are accountable for the part that we play in grid delivery.

The changes we need to make to the power system for the energy transition are unprecedented and of a similar scale to the original programme of electrification. This is a challenge for everyone involved and we are actively determining what we can do to accelerate grid delivery in Northern Ireland, learning what we can from the changes being made in GB. We are currently working through an "Acceleration Programme" internally where we are challenging our Grid Development process to determine what we could do differently to allow for more efficient grid delivery. We are working very closely with NIE Networks through the TDPNI Joint Working Group to establish a joint programme of works for all transmission development and asset replacement projects, again challenging ourselves on what could be done differently to support accelerated grid delivery.

We agree with industry responses of the requirement to move to a more pro-active and anticipatory approach to network development to reduce network constraints in a timely manner and deliver on renewable energy targets.

For example, the current process for transmission network project development requires project-by-project Needs and Options assessment to identify the preliminary preferred option before submitting a Transmission Network Preconstruction Project (TNPP) to the UR for approval before continuing with preconstruction works for that project. The UR aims to review each TNPP submission within four months. Following regulatory approval, a project begins preconstruction.

After completion of preconstruction, a project is handed over to NIE Networks for construction, who submit a Construction Approval to the UR. The review of this takes 6 months.

A significant amount of work and time goes into the preparation and review of both of these submissions by SONI, NIE Networks and the Utility Regulator.

In this respect, we note that Ofgem and National Grid Electricity System Operator (ESO) in GB have moved to approving works at a strategic plan level (rather than individual projects) and we believe that there are efficiencies and time savings from adopting this approach. Many of the recommendations on accelerated grid delivery in GB are just as relevant for NI and could be adopted with the correct governmental and regulatory support. We look forward to engaging with the UR and stakeholders on this.

Recognising the urgency of delivery of the plan, the increased scale of transmission reinforcement, and interrelationships between projects, since 2022 SONI and NIE Networks have been engaging regularly in reviewing the overall programme of transmission works as a whole. We have held workshops through the TDPNI Joint Working Group and this work has highlighted dependencies and critical path works that have led to a reappraisal of project dates. While it may appear that project delivery dates have slipped, we consider our more holistic approach to be resulting in more accurate and realistic delivery dates in which we can have a high level of confidence, applying the “business as usual” approach. This will help us identify any inefficiencies and barriers to timely project delivery. The outcome of this will be communicated in future TDPNI publications.

In the last year, we have submitted 4 projects to the UR for preconstruction approval, and we plan to submit a further 4 in the remainder of 2024. This is a significant increase – between 2020 and 2023 we submitted 4 projects for preconstruction approval, in that respect we believe the pace of grid development is stepping up.

Transmission network projects have considerable lead times and increasing network capacity is of critical importance. We have an obligation to plan the system in an efficient, economic and co-ordinated manner and we recognise the importance of incentivising generation connections where capacity already exists or can be delivered in a timely and economic way. We will engage with DfE, the UR and stakeholders on the proposed RESS scheme and other appropriate ways of providing these incentives – as well as ways we can co-ordinate connections and deliver capacity efficiently, such as transmission clusters. While the industry’s current focus is on reaching 80% of renewable generation by 2030, this is a stepping stone to the overall objective of a net zero power system and full decarbonisation of the economy by 2050. Tomorrow’s Energy Scenarios, which we have

recently consulted on, looks out to 2040 and 2050 and will be followed up this year by the TES Needs Assessment, which will consider the impact on the network on this timescale. This will be used to develop the next Transmission Development Plan to ensure that it is fit for 2050. Nonetheless, the projects which are currently planned are key steps on the way to 2050 targets and we will continue to develop them.

## Dispatch Down

### Fermanagh and Omagh District Council

*Reducing output from wind turbines when generation exceeds SNSP limits, or when local transmission bottlenecks occur, is currently the primary tool used to manage high wind generation during periods of low demand. The levels of wind turn down in the all-island system are a significant and growing problem. This is partly caused by grid constraints due to network capacity limits. According to the SONI/Eirgrid Annual Constraint and Curtailment Report and System and Renewable Data 2020, a total of 465 GWh of available wind energy was turned down in Northern Ireland, representing around 15% of available wind energy, worth approx. £15million in lost revenue and 0.688MtCO<sub>2</sub>. Rural western areas see the highest levels of constrained wind and typically have higher levels of social need, including fuel poverty. The map above highlights the shows in brown the 1,820 (of 4,537) most socially deprived areas of NI by small area postcode. The green overlays represent constraint groups, areas which see high levels of wind turn down due to network bottlenecks. Note that three constraint groups and higher levels of social deprivation are concentrated in the west and north-west, suggesting that these areas have the highest potential for using currently wasted wind energy to address social need (Keatley, P. 2020).*

### ESB GT

*... there doesn't appear to be a clear plan to address all of the constraint issues present within the Northwest of NI. Further work is required in order to effectively manage and mitigate the significant levels of curtailment that generators are facing due to insufficient levels of investment within this area. ESB GT notes that there are no projects being considered which will improve inter-regional flows. This is vital in facilitating an increase in renewables to the area, aiding national climate targets to be obtained.*

### North Channel Wind

*The high levels of dispatch down identified in the SOEF 1.1 scenario analysis for 2030 are of particular concern and present a significant risk to project viability. The grid operating conditions and other assumptions used in this scenario are acknowledged as aspirational, for example, 95% SNSP levels, demand flexibility of 20%, long duration energy storage of 2.8GW*



*(all Island). We encourage SONI to continue to act towards achieving and surpassing these challenging operating conditions, namely through:*

- *Continuation and expansion of DS3*
- *Reducing minimum conventional generation requirements*
- *Adoption of smart grid technologies such as Power flow controllers and Dynamic line rating*
- *Facilitation of the integration of storage, including long duration storage*
- *Facilitation of price responsive tariffs*
- *Continued identification and progression of required network improvements*

### **RenewableNI**

*The projects outlined in the TDPNI will be vital in reducing constraint levels in NI which have been rising significantly since 2018. NI curtailment generally remained materially higher than corresponding figures from RoI in 2020 and 2021, and to the analysis date in 2023. SONI's recent NI Constraints Report shows a continuation of this trend as we increase renewables penetration. Curtailment levels in NI have also followed a similar trend with SNSP increases failing to have a significant impact. Mullan Grid assess minimum generation levels of conventional plant (min gen) as being the predominant driver of curtailment. It is vital that transmission system developments keep pace with the connection of new renewable generation, and we see a corresponding ramping down of min gen, otherwise total dispatch down levels will make future renewable investments unfinanceable and potential carbon savings will not be realised.*

### **Our Response**

Reducing both current and future constraint levels are key to maximising the potential from renewable generation in Northern Ireland. The six grid development projects we have identified as critical to renewable integration will all improve inter-regional power flows:

- The Mid Antrim Upgrade will alleviate the existing bottleneck between Rasharkin and Kells;
- The Mid Tyrone Project will improve capacity between Omagh and the 275 kV system at Tamnamore;
- The North Sperrin Generation Substation will allow us to efficiently connect generation directly onto the 275 kV system, bypassing much of the need for constraint;
- The Moyle Interconnector Upgrade Project will allow us to make full use of the interconnector's capacity;
- The Northwest Reinforcement will prevent the area between Limavady and Rasharkin from becoming a bottleneck in future; and
- The North South Interconnector will reduce our need to run large conventional generators and provide more capacity for power to flow out of Northern Ireland.

Note that a total of 12 projects have been identified in the plan as improving inter-regional power flows.

Increasing the flexibility of the power system and adoption of smart grid technologies are also important for maximising efficient use of the network. Our Low Carbon Inertia Services project has, for the first time, tendered for inertia from synchronous compensators, which will allow us to reduce our dependence on large, conventional generating stations. The increasing levels of battery energy storage on the system are enhancing the responsiveness and flexibility of the system. In 2023 we launched a Call for Evidence on Long Duration Energy Storage (LDES) with EirGrid, which will be critical to ensuring security of supply during periods of low renewable availability, and also for utilising renewable generation during periods of oversupply. With NIE Networks, we are also investigating the potential of Dynamic Line Rating for maximising network capacity and intend to implement it on the Magherakeel – Omagh 110 kV circuit as a trial.

It should be noted that across 2023 we have observed an increase in imports from GB even at times of high renewables in Northern Ireland. This has had an adverse effect on dispatch down. These flows are set by market prices and outside the control of SONI. While SONI will seek to maximise renewable generation by trading on the interconnectors to increase exports, it requires agreement with National Grid Electricity System Operator (NGESO). Operational experience is that at times of high renewables in Northern Ireland there are high renewables in GB and hence these trades are not agreed.

## Project Websites

### Renewable NI

*RNI would encourage SONI to provide more frequent updates to the Projects page of the SONI website. It currently appears that only four of the six key enabler projects have dedicated pages, with updates on both Mid Tyrone and Moyle Interconnector due to be added.*

### Our Response

SONI is currently doing an audit of our website and project webpages. We are working to ensure that all project webpages are updated to provide our stakeholders and partners with timely and relevant information. We intend to have dedicated webpages for all strategic projects listed in the TDPNI in the coming months.



## Co-ordination with the Gas Network

### ESB GT

*It may also be beneficial to consider joint, or co-developed, investment plans between electricity and gas transmission. An example of this could be SONI collaborating with InvestNI with regards to the proposed Industrial Decarbonisation Zones, supported by the Industrial Energy Transformation Fund. Therefore, moving towards an approach of co-optimised, multi-energy vector planning which efficiently assesses network investment needs across electricity, gas and hydrogen. Under this approach, excess generation of electricity could also be utilised through electrolysis – enabling NI’s hydrogen ambitions to be realised, encouraging innovation, reducing the requirement for investment in the network and preventing constraint costs. Thus, enabling a low cost, low risk transition to Net Zero.*

### Our Response

Northern Ireland is a relatively small geographic area, but has the availability of salt cavern storage which would potentially be useful for storing gases for the purpose of energy storage, and it has an internationally recognised track record of innovative engineering and manufacturing capabilities. SONI recognises that, as the energy transition progresses, it becomes increasingly important to co-ordinate the planning of different energy vectors such as electricity and gas in order to deliver the most efficient, sustainable, and reliable energy system to customers Northern Ireland. We are exploring hydrogen as part of broader studies within decarbonisation technologies, for example Tomorrow’s Energy Scenarios.

We believe there is a need for an NI energy-system level plan, equivalent to the GB Strategic Spatial Energy Plan. This could be developed on a similar basis to the regional plans for GB, led by SONI working in cooperation with other relevant parties, including the gas network operators. We included this in our recent response to the DfE’s Smart System and Flexibility Plan consultation.

## Projects Not Included in TDPNI 2023-2032

### North Channel Wind

*We note that several potentially beneficial upgrades (and market alignments for high RES) identified in the 2021 SOEF [Shaping Our Electricity Future], and subsequent 2023 revision, have not been included in the draft TDP;*

- *New Substation in the Southeast*
- *Upgraded circuits (e.g. between Lisburn and Tandragee)*
- *Two dynamic line rating projects*

*We encourage SONI to consider inclusion of these projects, or to add context to the TDP around reasons for omission.*

## RES

*RES notes several projects from previous Network Development Plans are no longer active and have been removed from this document. Industry uses this document as a means of identifying potential new sites, as well as assessing project viability including potential dispatch down, N-1 overload issues and ability to connect. There needs to be more transparency in the development of these plans with industry, to help industry understand the status of projects and the investment challenges associated with projects. The information published by SONI is an important source of information and gives developers like RES the signal to engage in development work in the areas identified for new projects. RES would ask SONI to take this into account when finalising this document as well as producing new plans in the future. It may be prudent to include details of what stage the projects detailed within this plan are at, to inform stakeholders of the status or importance of all projects included within the plan.*

## Our Response

The inclusion of projects named in the plan is constantly under review. We know that the likelihood exists for a need for further upgrades of existing lines beyond those listed in the plan and are in the process of confirming the need for this work. Additionally, the output of the upcoming TES Needs Assessment will confirm the need for any additional projects will be necessary beyond 2030.

We are planning to take forward a Dynamic Line Rating (DLR) project on the Magherakeel – Omagh 110 kV line. We are working on the scope of this project with NIE Networks. This will be reflected in future TDPNI publications. The other previously proposed DLR scheme (Drumquin – Dromore 110 kV) has been ruled out for now as there is a cable section on this circuit which would not be suitable for a dynamic rating.

With regard to the progress of projects – the tables in Appendix B show which stage of the SONI Grid Development Process each project is at. We will give consideration to what extent we can improve upon the detail of this in future TDPNI publications.

## Contestability

### North Channel Wind

*Contestable network connections are currently available for generation and demand at the distribution level. At present, there is no process by which third parties can bid to deliver transmission system infrastructure. At transmission level, the option of contestable connections will provide the opportunity for accelerated timelines and perhaps more cost-effective connections.*

## **Our Response**

While it is currently possible for a generator to request a contestable transmission connection, there is currently no policy for the practical implementation of contestability at transmission in place to enable this. We are working with NIE Networks to progress this project as we recognise that it has the potential to support expedited delivery of connection assets.

## **Offshore Policy**

### **North Channel Wind**

*North Channel Wind understand that offshore connection policy (to determine who will own and operate offshore assets and how these are paid for) are being considered by the OREAP working group for the Electricity Network. We feel that resolution of this issue should be time limited and note that there has already been significant work completed in other jurisdictions (Ireland and GB) which have well developed and understood offshore transmission connections policies, accepted Grid Code standards and offshore wind connection strategies and that these may be amended as appropriate to Northern Ireland and replicated to suit. Timely resolution and clarity on this issue will provide good visibility to developers and improve the risk profile of developing offshore projects in the region.*

## **Our Response**

SONI is a member of the DfE's Offshore Renewable Action Plan (OREAP) Steering Group and the OREAP Transmission Working Group and have been working with the other members on the issue regarding connection point, offshore asset ownership and operation.

We agree that timely decision making on all aspects of offshore policy is vital to enable Northern Ireland's energy transition and has noted this issue in SOEF v1.1.

## **Connecting Future Renewable Generation**

### **RenewableNI**

*RNI is concerned that the necessary transmission developments will not be delivered in time to meet the obligations of the NI Climate Act. At a time when the 80% renewable electricity by 2030 (80 by 30) obligation will require us to connect new renewables at a pace not previously seen, the lack of a Firm Access policy will act as a significant barrier to new connections. The Non Firm Access policy was intended as an interim solution to allow new connections in the absence of a wider energy policy. Now that the Energy Strategy has been published it is vital that progress is made on a Firm Access Policy. We note that this was recently consulted on by the SEMC, with a firm access policy introduced for ROI. This is another example of a lack of cohesion within the SEM, and a clear example of how ROI is progressing policy at a much quicker rate than NI, with NI lagging behind...*

### **Ulster Farmers Union**

*Due to the remote location of the majority of our members, a considerable number of RES projects are located in rural areas where the transmission network is less developed, placing pressure on the electricity transmission network in these areas. Significant challenges will arise in extending and reinforcing the network to connect new RES and the UFU are optimistic that TDPNI will go a long way to addressing this. Landowners aspire to be involved in many RES-related projects in advance of 2030 and beyond and the TDPNI will enable this, however, there a number of barriers which need to be addressed and dealt with.*

### **Our Response**

SONI looks forward to working with developers, landowners and all key stakeholders to ensure projects are delivered in a timely manner and in an equitable manner. We would like to thank both RenewableNI and the Ulster Farmers Union for their continued productive engagement with the TDPNI process.

SONI is reviewing the Firm Access Quantity (FAQ) process in 2024 with a view to updating it to ensure that it is fit for purpose for the generation seeking to connect to the grid in the future. We will engage further with industry on this later this year.

The provision of the projected pipeline of future connections by RenewableNI has been extremely useful in informing the TDPNI and is important to allowing us to develop the network in a proactive manner.

As discussed in more detail in the Compensation and Community Benefit sections below, we are working closely with the UR to review our approach to landowners and communities and help ensure that those who host infrastructure are fairly remunerated for doing so.

## **SONI Resourcing**

### **RenewableNI**

*We are concerned that SONI does not currently have sufficient resources to complete the required modelling studies, compete designs, manage and deliver, ARP's and NDP's on time (ideally ahead of time) and provide the timely connection offers needed to meet the very pressing timescales for the noted transmission system upgrades and new connections. NIE Networks' Networks for Net Zero study shows that due to downward pressure increased renewable generation has on the wholesale price of electricity, that achieving 70% renewable generation, will result in a net consumer saving of 1% after taking account of all the necessary grid investments. RNI's Achieving Zero study estimates that going from 70% to 80% will result in an additional consumer saving of £50m. It is important that the Utility Regulator (UR)*

*recognises that the investments needed to incorporate a greater penetration of renewables will save the consumer money. RNI is concerned that the UR takes a narrow view of network costs when the earlier we can make these investments, the better the return will be for the consumer. RNI is keen to work with SONI to help make this case.*

### **Our Response**

Although SONI resourcing is not in scope in this consultation, all responses received here will be shared with the Utility Regulator, and there will be a further opportunity to respond to the UR's upcoming consultation on the TDPNI.

SONI is actively increasing its resourcing in what is a challenging area in terms of skills availability. We are also starting to develop our 5-year business plan (which we need to submit to the UR in early 2025) and we intend to engage with all stakeholders later this year. We are happy to meet with RNI to discuss this further as part of that process.

## **Shaping Our Electricity Future**

### **Ulster Farmers Union**

*The UFU response to the Shaping Our Electricity Future Roadmap was submitted on 11 June 2021. We focused on the role of Distributed Generation in the drive to energy transition/decarbonisation. Responding to the proposal for a 'generation-led' approach we made our scepticism clear in terms of any reliance upon offshore wind. Instead, the UFU urged for weighting to be reconsidered towards other proposed solutions. Focus should be on 'technology-led' and 'demand-led' approaches as these would serve better to pursue the interests of our members.*

### **Our Response**

SOEF v1.1. outlines necessary projects for delivering the 80% RES-E target for 2030 in NI. SONI does not prioritise any form of renewable generation over another, but it should be noted that, as per SOEF v1.1, we anticipate the majority of the new renewable generation capacity in Northern Ireland being onshore wind and PV. We believe that there is a need for an NI-wide energy system-level plan, comparable to the GB Strategic Spatial Energy Plan, and we are engaging with policy makers on this.

## **Planning**

### **Ulster Farmers Union**

*The UFU want to see a revised planning policy which provides greater certainty to facilitate the delivery of the 80% by 2030 renewable energy target. We have concerns that the current (and proposed revised) policy will not facilitate this overarching objective.*

*Timescale for planning decisions (including repowering) needs to be addressed as the time taken to obtain planning approval for an identified project has been increasing.*

*With time running out to meet 2030 targets, we are concerned that planning policy could restrict both current and future development of small-scale renewables development across Northern Ireland.*

#### **Armagh, Banbridge and Craigavon Borough Council**

*A number of the planned development projects will fall within the Armagh City, Banbridge and Craigavon Borough Council Area. Depending on the scale and nature of the project, planning permission may be required. Any project which is not a regionally significant project (as defined in Section 26 of the Planning Act (NI) 2011) will be processed by the Council. The Council would encourage early pre application engagement with the Council to ensure issues are identified as early as possible in the planning application process.*

#### **Fermanagh & Omagh District Council**

*The Council would encourage SONI to undertake early pre application discussions with relevant planning authorities to ensure that key issues are identified as early as possible and this will ensure a better quality of application, which will avoid delays in the processing of the applications. In this regard, the Council welcomes the commitment under CEP1: To consult and engage with statutory and non-statutory stakeholders including communities, landowners, and the general public, at the earliest appropriate stage of a project's development.*

*SONI should have regard not only to relevant planning legislation and guidelines but also to planning policies and in particular new recently adopted Plan Strategies. SONI should also be aware of likely future changes to regional policy and legislation arising from the regional planning improvement work programme and most recently the Department for Infrastructure's Call for Evidence on 'A Future Focused Review of the SPPS on the Issue of Climate Change'.*

#### **Our response**

Central to SONI's 3-Part Process Grid Development is stakeholder and community engagement that goes above and beyond what is required by planning legislation. Our robust engagement model requires our teams to engage with statutory and non-statutory stakeholders often years in advance of a planning application being submitted. This early engagement includes liaising with local planning authorities to ensure any potential delay can be mitigated where possible at the earliest stage. Pre-Application Discussions (PAD) are utilised by SONI to ensure planning applications are of high-quality and meet the requirements of the local planning authority before submitting a Proposal of Application Notice (PAN) and carrying out Pre-Application Community Consultation (PACC).

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## Community Benefit

### Ulster Farmers Union

*Rural Community projects which host infrastructure do not always see a direct benefit for doing so. Communities may not see a direct link between connecting low carbon generation and local decarbonisation outcomes and local residents may respond by strongly opposing renewable projects. Guidance on community benefits should be delivered and adopted quickly by the Transmission Operator setting out what they are able to offer.*

*Residents of properties close to new overhead lines could receive a defined direct payment. Communities could receive a set amount of money for new visible infrastructure they host. The benefit could be a defined value per kilometre of overhead line (OHL) or an appropriate amount for other visible infrastructure. This benefit would only be available for hosting OHL or other visible infrastructure (e.g. substations). An example could be where providing a community benefit (set per kilometre of OHL) could be less expensive than using an underground cable and will have a lower environmental impact.*

*The six new build project represent significant changes to the landscapes in the areas where they are planned to be and will have a major effect on the local communities. UFU represent farmers and rural dweller, who are set to experience a greater impact than the urban population, due to the locations of the proposed six newbuilds, yet they will enjoy no more benefit from the project compared to rural dwellers.*

### Our response

Grid operators in both Ireland and Great Britain operate a community benefit model which works to enhance engagement with local communities who host grid infrastructure. The absence of any such model or fund in Northern Ireland renders SONI an outlier across these islands. We are currently reviewing best practice in this field and intend to work with the UR in the time ahead to develop a bespoke model that brings Northern Ireland into alignment with our neighbouring jurisdictions, helping to secure goodwill in communities set to host grid infrastructure.

## Compensation

### Ulster Farmers Union

*UFU suggest improvement in how compensation packages are created by SONI and the Utility Regulator. Compensation should be fair, move with inflation and be reflective of the economy at the time of build. UFU stress the importance of the value of compensation at the time of build, it is not right to agree compensation years prior to beginning building works. As SONI desire to make the UK, ROI and NI electricity markets more integrated, there is need to improve the process for compensated landowners for the same scheme in different*



*jurisdictions. This will require Utility Regulators, governments and planning authorities to co-design compensation that is fair in all nations.*

### **Our response**

SONI is acutely aware that the topic of compensation is a key area of concern for landowners in terms of the roll out of proposed transmission projects across Northern Ireland. Following feedback, SONI worked with the UR, the Ulster Farmers Union and others to develop a generous and appropriate compensation package for the North South Interconnector project.

However, we note that Northern Ireland is an outlier in Great Britain and Ireland in relation to a standardised compensation package beyond what is currently available through annual wayleave payments from NIE Networks.

We understand that compensation should be fair and reflective of the actual loss, and we are acutely aware of the strength of feeling among current rural stakeholders that the current approach is insufficient.

Recently, we have been engaging with the Utility Regulator to recommend a change in approach to compensation to a more generous and standardised package for all future transmission network projects in line with best practice elsewhere.

Noting the UR's role in the approval of costs associated with transmission network projects, we await a decision on whether SONI can proceed with a revised approach.

In the event the UR approves a new approach, SONI will engage with key stakeholders on our proposals for a revised, standardised package of compensation which reflects best practice elsewhere and acknowledges the cost to the consumer.



## Summary of feedback – SEA and HRA

The table below details the consultation responses received in relation to the SEA and HRA, and our responses and actions taken.

| No. | Respondent       | Document             | Comment   | Action  |
|-----|------------------|----------------------|---|---|
| 1   | DAERA - SEA Team | Environmental Report | The layout and content of the Environmental Report is well laid out and easy to follow. DAERA SEA Team is content that the environmental report and the process of consultation follow the SEA Directive.   | Comment noted. No action needed.  |
| 2   | DAERA - SEA Team | Environmental Report | A description of the current state of the environment and how this relates to the proposed Framework is included within the environmental report. Appropriate environmental objectives / targets / indicators for each of the likely environmental receptors is addressed including consideration of alternatives, an assessment of significant impact and complemented with mitigation measures and monitoring programme.  | Comment noted. No action needed.  |
| 3   | DAERA - SEA Team | Environmental Report | We note the mitigation measures that are proposed to ensure that environmental effects are minimised by any development occurring from the plan. We also note that 21 specific projects have been identified that may be progressed as part of the plan and that these have not been finalised, at time of writing. The mitigation measures proposed within the ER are quite detailed and may carry over in part to project level assessment which may be included as part of environmental impact assessment (EIA) or other environmental assessments.   | Comment noted. No action needed.  |
| 4   | DAERA - SEA Team | Environmental Report | We note the mitigation section includes the following: 'The principal mitigation recommendation is that the predicted negative effects should be considered further during the next stage of detailed planning and design, when the specifics of the development infrastructure options can be optimised through detailed feasibility studies and design in order to limit identified impacts on sensitive receptors (p273). While we welcome further environmental consideration during the next phase of development, we would assume that appropriate further environmental assessments are completed such as EIA for projects that are taken forward from the plan. EIA would encompass further environmental studies in conjunction with detailed plans of proposed development and would offer detailed mitigation options based on the specific issues arising from any proposal. Provided that appropriate environmental assessment is carried out on any project arising from the plan we are content with the mitigation and monitoring contained within the ER. Engagement with appropriate authorities should be undertaken at the earliest time during these assessments to ensure robust assessment and mitigation is undertaken. | We note the planning and environmental considerations as set out in Section 3-5 of the draft TDPNI, and the requirement for EIA for certain projects, including sub-threshold developments where the planning authority has identified likely significant effects on the environment. Text has been added to p.277 of the SEA ER to reflect the following feedback from SONI: Where a project is identified to be sub-threshold and not requiring an EIA, SONI will still prepare an assessment of the environmental and social effects of the project. This report will be scoped in consultation with the local council and other key stakeholders to ensure that any concerns are addressed. This assessment will address the environmental and social effects of the project and include an assessment of the cumulative effects with other projects.". SONI have updated Section 10 of the TDPNI to reflect amendments to Section 8 of the SEA ER. |

| No. | Respondent                    | Document             | Comment   | Action                           |
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| 5   | DAERA - NED                   | Environmental Report | NED notes and welcomes that our comments provided at the scoping stage have been taken into account during the preparation of the environmental report. We note that the baseline assessment is a general assessment for the entire country, the geographical scope of the plan, and are in agreement with the ER regarding the pressures faced by biodiversity and the potential effects that the plan may have. We are also in agreement with the baselines as reported for the specific projects that have been screened into the SEA and note that not all projects have yet been agreed or progressed to the next stage. We would expect at the next stage that projects arising should be screened for EIA as appropriate to ensure that mitigation measures can be specific to each project. NED welcomes the mitigation measures contained within the ER and notes that they are highly detailed measures. Should these measures be used for the appropriate project, as defined by further environmental assessment (such as EIA) then we are content that harms to the environment should be minimised. NED welcomes the objective of no loss of biodiversity and promotion of gains in biodiversity as a result of implementation of the plan. | Comment noted. No action needed. |
| 6   | DAERA - NED                   | HRA                  | NED notes that there are a number of projects arising from the plan which may impact upon designated sites, through habitat loss, water quality and habitat deterioration or disturbance and displacement if they are to proceed to the project phase. NED notes from p108, that the TDPNI is strategic and does not define the precise location or route of any potential project that may arise from it and that mitigation measures, such as avoidance, will be incorporated and carried out at the earliest opportunity. NED welcomes the statement 'In developing future projects SONI will seek to find options that avoid impacts on European sites' and that Constraints Studies and Route or Site Selection Studies will also be carried out. NED also welcomes that screening for and / or appropriate assessment will be carried out on all relevant projects to identify the environmental effects that a project may have on designated sites which will include mitigation measures designed to deal with these effects.  | Comment noted. No action needed. |
| 7   | DAERA - Landscape Team        | Environmental Report | The Landscape Team welcomes Landscape and Visual objectives have been included within the SEA and the comments provided at the scoping stage have been considered. The landscape team is content with the Landscape/Visual outcomes of the assessment. Project specific impacts will have to be examined at EIA depending on the transmission development type and the potential for cumulative impacts assessed at this stage. The Landscape Team have no further comments to add to the SEA Environmental Report.   | Comment noted. No action needed. |
| 8   | DAERA - Water Management Unit | Environmental Report | Water Management Unit welcomes that our comments made in response to the scoping exercise have been considered and where appropriate, incorporated into the SEA report. Water Management Unit notes and welcomes the contents of the Environmental Report relating to the potential for impacts to the aquatic environment that may arise from implementation of SONI Transmission Development Plan for Northern Ireland 2023-2032 (TDPNI).   | Comment noted. No action needed. |
| 9   | DAERA - Water Management Unit | Environmental Report | Water Management Unit considers the baseline information provided in relation to the topic of the water environment appropriate. Water Management Unit also concurs with the identification of current pressures to that environment and the identification of potential impacts that may arise from implementation of the plan.  | Comment noted. No action needed. |
| 10  | DAERA - Water Management Unit | Environmental Report | Water Management welcomes that the SEA report has considered, and subsequently explored the potential for transboundary impacts to the Republic of Ireland aquatic environment that could arise from implementation of the plan.  | Comment noted. No action needed. |

| No. | Respondent                                | Document                          | Comment   | Action   |
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| 11  | DAERA - Water Management Unit             | Environmental Report - Mitigation | Water Management Unit notes and welcomes the inclusion of mitigation measures where the potential for adverse impacts on the aquatic environment have been identified. Water Management Unit is supportive of these measures and consider it essential that all of those identified are fully implemented. It should be noted that the mitigation measures identified should not be considered as definitive but should be reviewed throughout the life of the TDPNI and considering the data obtained from the monitoring proposed to ensure the effectiveness of those measures.  | We have noted in Section 8.1.3 of the SEA ER 'These mitigation measures should not be considered as definitive, and should be reviewed, and current best practice measures applied, throughout the life of the TDPNI. SONI have updated the mitigation in Section 10.2 of the TDPNI to reflect this amendment.               |
| 12  | DAERA - Water Management Unit             | Environmental Report - Monitoring | Water Management Unit notes and is broadly supportive of the monitoring regimes proposed in relation to the aquatic environment. Monitoring must be subject to review at each reporting stage to reflect new data obtained. It essential that interventions (including additional mitigation measures or plan revisions where required) are undertaken if any unforeseen or adverse environmental effects to the aquatic environment are identified during the monitoring regime.   | We note that the SEA monitoring regime, as set out in the SEA Environmental Report, is considered prior to the next cycle i.e., the TDPNI for 2028-2037. We have added further information on monitoring to p.288 of the SEA ER. SONI have updated Section 10 of the TDPNI to reflect amendments to Section 8 of the SEA ER. |
| 13  | DAERA - Water Management Unit             | Environmental Report - Monitoring | Water Management Unit would be supportive of the identification of any positive impacts to the aquatic environment identified as a result monitoring also being reported as this will assist in determining successful environmental actions and therefore may be of use informing future iterations of this or other similar plans.  | We have added specific reference to the identification of positive impacts through monitoring to p. 288, Section 8.3 of the SEA ER. SONI have updated Section 10 of the TDPNI to reflect amendments to Section 8 of the SEA ER.  |
| 14  | DAERA - Drinking Water Inspectorate       | Environmental Report              | Thank you for consulting with the Drinking Water Inspectorate (DWI) on the Transmission Development Plan for Northern Ireland - SEA & HRA reports. Upon review, DWI welcome the acknowledgement of Drinking Water Protected Areas and associated legislation. We note the minor discussion on private water supplies (Appendix B) including the statement that the draft TDPNI should have regard for the environmental protection objectives included in the Private Water Supplies Regulations (Northern Ireland) 2017. Development and operation of electrical transmission infrastructure should not negatively impact on designated drinking water. DWI believe the report lacks detail or awareness of private water supplies across Northern Ireland | We have added further information on public and private water supplies to the baseline, Section 3.3.4.1 of the SEA ER.   |
| 15  | DAERA - Drinking Water Inspectorate       | Environmental Report              | It is noted that maintaining good working practices during the restring and cabling works should avoid risks to drinking water sources  | Comment noted. No action needed.   |
| 16  | DAERA - Air Quality and Biodiversity Unit | Environmental Report              | AQBU suggests that consideration should be given to construction and traffic related activities associated with the delivery of projects within the Draft Transmission Development Plan and if they might trigger a significant air quality effect on nearby sensitive habitats or species. Activities within 200m of sensitive habitats to air pollution should be assessed for potential effects from NOx and dust. For further information on the impacts of aerial pollutants on sensitive habitats, please contact AQBU@daera-ni.gov.uk  | We have referenced the potential for air quality effects on sensitive habitats or species within the mitigation Section 8, Table 8-1, no. 19 for further consideration during project implementation. SONI have updated Section 10 of the TDPNI to reflect amendments to Section 8 of the SEA ER.                            |
| 17  | DAERA - Marine Conservation Branch        | Plan                              | In Section 4.1.4 for ENVP2 we recommend also including the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended) and The Wildlife (Northern Ireland) Order 1985 (as amended).  | SONI has amended ENVP2 as suggested by the consultee. We has updated the SEA ER and HRA to reflect this amendment.   |
| 18  | DAERA - Marine                            | Plan                              | In section 4.1.4, for ENVP3, where relevant we also advise considering MCZs.  | SONI has amended ENVP3 as suggested by the consultee. We has updated the SEA ER and HRA to reflect this amendment.   |

| No. | Respondent                         | Document             | Comment   | Action  |
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|     | Conservation Branch                |                      |   |   |
| 19  | DAERA - Marine Conservation Branch | Plan                 | In section 10.1, regarding CEMPS, we recommend that mitigation such as marine mammal observers should be considered as well as standing advice to prevent pollution, marine litter and the potential for introduction and/or spread of invasive non-native species.   | Although no marine works are proposed in this iteration, they are possible within the TDP framework. We have added this information to Section 8 of the SEA ER, noting that no marine works are proposed in this TDP and a caveat of 'where applicable' has been added to any marine mitigation in Table 8.1. SONI have updated Section 10 of the TDPNI to reflect amendments to Section 8 of the SEA ER. |
| 20  | DAERA - Marine Conservation Branch | Plan                 | Table 10-1 for point 3, we advise where cables will be in the marine environment to consider the potential impact of EM on marine species.  | Although no marine works are proposed in this iteration, they are possible within the TDP framework. We have added this information to Section 8 of the SEA ER, noting that no marine works are proposed in this TDP and a caveat of 'where applicable' has been added to any marine mitigation in Table 8.1. SONI have updated Section 10 of the TDPNI to reflect amendments to Section 8 of the SEA ER. |
| 21  | DAERA - Marine Conservation Branch | Plan                 | Table 10-1 for point 8 we advise the updated screening distances for marine mammals:- all SACs within 100km of the project should be screened for Grey seals ( <i>Halichoerus grypus</i> ) - all SACs within 50km should be screened for Harbour seals ( <i>Phoca vitulina</i> ) - all SACs within 100km should be screened for Harbour porpoise ( <i>Phocoena phocoena</i> ) | Although no marine works are proposed in this iteration, they are possible within the TDP framework. We have added this information to Section 8 of the SEA ER, noting that no marine works are proposed in this TDP and a caveat of 'where applicable' has been added to any marine mitigation in Table 8.1. SONI have updated Section 10 of the TDPNI to reflect amendments to Section 8 of the SEA ER. |
| 22  | DAERA - Marine Conservation Branch | Plan                 | Table 10-1, for point 29 and 30, we advise considering seascape.  | Although no marine works are proposed in this iteration, they are possible within the TDP framework. We have added this information to Section 8 of the SEA ER, noting that no marine works are proposed in this TDP and a caveat of 'where applicable' has been added to any marine mitigation in Table 8.1. SONI have updated Section 10 of the TDPNI to reflect amendments to Section 8 of the SEA ER. |
| 23  | DAERA - Marine Conservation Branch | Plan                 | Table 10-1, in general we recommend considering any potential impacts to coastal processes and the subsequent potential impact to associated habitats and species.  | No action needed. We note that there are no proposed projects within the TDPNI that identify any requirement for marine cabling. All projects are situated onshore, and no potential impacts have been identified for coastal processes, therefore no mitigation is currently proposed for this iteration of the plan.  |
| 24  | DAERA - Marine Conservation Branch | Environmental Report | On Page xi under Environmental Baseline, we advise there are 18 not 16 SPAs as the East Coast Marine pSPA and the Carlingford Marine pSPA need to be considered.  | We have amended this figure in the non-technical summary and the baseline for Biodiversity, Flora & Fauna in the SEA ER.  |
| 25  | DAERA - Marine                     | Environmental Report | In Table 0-2 for BFF we recommend also considering MCZs and ASSIs.  | We note that national designated sites in the SEOs include these designations. We have amended Table 0-   |

| No. | Respondent                         | Document             | Comment  | Action  |
|-----|------------------------------------|----------------------|--|---|
|     | Conservation Branch                |                      |  | 2 and Table 5-2 of the SEA ER to include specific reference to MCZs, ASSIs and SLNCIs.  |
| 26  | DAERA - Marine Conservation Branch | Environmental Report | In Table 0-2 for Landscape/Seascape and visual amenity we advise reference to the Regional Seascape Character Areas: Northern Ireland Regional Seascape Character Assessment   | We have amended Table 0-2 and Table 5-2 to include reference to LCAs and RSCAs. We note that seascape character is referenced in the SEOs, however there is no sensitivity assessment for Regional SCAs.  |
| 27  | DAERA - Marine Conservation Branch | Environmental Report | For Plan Proposal Assessment where habitat loss is envisaged, we advise that there is likely to be long term negative impacts to BFF and to landscape/visual amenity.  | We have reviewed the assessment text to ensure that habitat loss is identified as a long-term effect for any new developments, excluding urban areas.   |
| 28  | DAERA - Marine Conservation Branch | Environmental Report | For Coolkeeragh 110kV extension we advise considering priority species and protected species outside of designated sites as well.  | We have amended the SEA assessment of this project to reference the potential for disturbance effects on protected species.   |
| 29  | DAERA - Marine Conservation Branch | Environmental Report | Table 1-2 for BFF we advise also considering the potential for introduction and/or spread of invasive non-native species and the potential impacts of EM from cables.  | We note that invasive, non-native species are already included in this table. We have added information on EMF impacts to Table 1-2 of the SEA ER.  |
| 30  | DAERA - Marine Conservation Branch | Environmental Report | In Table 2-1 for ENVP2 we recommend also including the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended) and The Wildlife (Northern Ireland) Order 1985 (as amended).   | Note that these are Plan Objectives and Policies. SONI have amended this policy. We have included this amendment in the SEA ER.   |
| 31  | DAERA - Marine Conservation Branch | Environmental Report | In Table 2-1 for ENVP3, where relevant we also advise considering MCZs.  | Note that these are Plan Objectives and Policies. SONI have amended this policy. We have included this amendment in the SEA ER.   |
| 32  | DAERA - Marine Conservation Branch | Environmental Report | In Table 2-1 for ENVO4 we advise including Regional Seascape Character Areas.  | Note that these are Plan Objectives and Policies. SONI have amended this objective. We have included this amendment in the SEA ER.  |
| 33  | DAERA - Marine Conservation Branch | Environmental Report | In Table 2-1 under Noise we recommend considering construction noise for marine mammals and to consider the impacts of EMF on species.   | Note that these are Plan Objectives and Policies. SONI have amended ENVO2.  |
| 34  | DAERA - Marine Conservation Branch | Environmental Report | In Section 2.5.1.2.2, we recommend that marine mammal disturbance needs to be taken into consideration as seal species are protected by the Wildlife (Northern Ireland) Order 1985 (as amended). Please see the below screening distances: - all SACs within 100km of the project should be screened for Grey seals ( <i>Halichoerus grypus</i> ) - all SACs within 50km should be screened for Harbour seals ( <i>Phoca vitulina</i> ) - all SACs within 100km should be screened for Harbour porpoise ( <i>Phocoena phocoena</i> ) | We have added this information to Section 2.5.1.2.2 of the SEA ER.  |
| 35  | DAERA - Marine Conservation Branch | Environmental Report | Furthermore, we recommend considering pollution standing advice (Standing advice for development that may have an effect on the water environment (including groundwater and fisheries)) as well as invasive non-native species biosecurity measures (Marine Non Native Species)   | We have added this information to Section 2.5.1.2.2 of the SEA ER.  |
| 36  | DAERA - Marine Conservation Branch | Environmental Report | In Table 3-1 we recommend the Landscape section also considers the 24 Regional Seascape Character Areas.   | Note that Table 3-1 is a summary of the information available in the State of the Environment report for NI, however RSCAs have been described in the baseline characteristics for the area in Section 3.3.9 of the SEA ER. We have added a note to Table 3-1 to highlight that RSCAs are not referred to in the current SoE report for NI, but are described in Section 3.3.9. |
| 37  | DAERA - Marine Conservation Branch | Environmental Report | In Section 3.3.1.1.1, we advise there are 18 not 16 SPAs as the East Coast Marine pSPA and the Carlingford Marine pSPA need to be considered.  | We have amended this figure in the baseline of the SEA ER.  |

| No. | Respondent                         | Document                   | Comment  | Action  |
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|     | Conservation Branch                |                            |  |   |
| 38  | DAERA - Marine Conservation Branch | Environmental Report       | In Section 3.3.1.1.1, please note that SPAs and SACs are designated under the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended).  | We have added reference to this legislation in the baseline of the SEA ER.  |
| 39  | DAERA - Marine Conservation Branch | Environmental Report       | In section 3.3.1.3, we recommend considering marine invasive non-native species where relevant.  | We have added information relevant to marine invasive non-native species to Section 3.3.1.3 of the baseline of the SEA ER.  |
| 40  | DAERA - Marine Conservation Branch | Environmental Report       | In section 3.3.1.3, we advise considering the potential impacts of EM from cables on marine species, where relevant.   | We have added information on EMF to Section 3.3.1.2 of the baseline of the SEA ER as, although no marine works are proposed in this iteration, they are possible within the TDP framework.  |
| 41  | DAERA - Marine Conservation Branch | Environmental Report       | In Table 5-2, for BFF we advise considering MCZs and ASSIs.  | We have amended Table 0-2 and Table 5-2 of the SEA ER to include specific reference to MCZs, ASSIs and SLNCIs.  |
| 42  | DAERA - Marine Conservation Branch | Environmental Report       | In Table 5-4, ENVP3 we advise considering MCZs.  | Note that these are Plan Objectives and Policies, and the SEA is considering their compatibility with the SEOs. SONI have amended this policy. We have included this amendment in the SEA ER.   |
| 43  | DAERA - Marine Conservation Branch | Environmental Report       | In Table 5-4, for ENVO2, we advise also considering sensitive receptors to EM from cables.   | Note that these are Plan Objectives and Policies, and the SEA is considering their compatibility with the SEOs. SONI have amended ENVO2. We have included this amendment in the SEA ER.   |
| 44  | DAERA - Marine Conservation Branch | Environmental Report       | In table 5-4 for ENVP2 we recommend also including the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended) and The Wildlife (Northern Ireland) Order 1985 (as amended).                 | Note that these are Plan Objectives and Policies, and the SEA is considering their compatibility with the SEOs. SONI have amended ENVP2. We have included this amendment in the SEA ER.   |
| 45  | DAERA - Marine Conservation Branch | Environmental Report       | Table 5-5, we advise that SACs and SPAs are designated under the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended)  | We have amended Table 5-5 of the SEA ER, as recommended.  |
| 46  | DAERA - Marine Conservation Branch | Environmental Report       | In Table 7-1, consideration of the potential marine mammal disturbance for infrastructure near or in the marine environment. Furthermore, we advise considering the potential impacts of EM from cables on marine species. | We have added the suggested information to Table 7.1 of the SEA ER.   |
| 47  | DAERA - Marine Conservation Branch | HRA / Environmental Report | For Section 7.2.1, due to the marine mammal screening distances provided above, the following MPAs will also need to be considered in the HRA: North Channel SAC, The Maidens SAC and The Skerries and Causeway SAC.       | As there are no marine projects proposed by the Plan and as there are no intended or reasonably foreseeable marine works, the potential impact pathway of underwater (subsea) noise capable of causing injury or disturbance to marine mammals is not considered further. As such, marine mammal qualifying interests of the Strangford Lough SAC, North Channel SAC, The Maidens SAC, Murlough SAC and Skerries and Causeway SAC are not considered further in the HRA |
| 48  | DAERA - Marine Conservation Branch | Environmental Report       | For Section 7.2.1, Larne Lough Regional Seascape Character Area needs to be considered.  | The SEA ER has been amended to reference potential temporary impacts on Larne Lough RSCA in Section 7.2.1 and Appendix D F1. Note that this has not changed the assessment outcome.   |
| 49  | DAERA - Marine Conservation Branch | Environmental Report       | For Section 7.2.1, as the HRA has identified that habitat loss is a potential negative impact we advise the bar graph needs to show long-term negative impacts.  | Text in Section 5.2.1 of HRA (under 'Area 2 (Larne)') has been edited as the habitat loss in-combination pathway was included in error. Only in-combination water quality deterioration impact pathway remains.   |

| No. | Respondent                         | Document                   | Comment   | Action  |
|-----|------------------------------------|----------------------------|---|---|
| 50  | DAERA - Marine Conservation Branch | HRA / Environmental Report | For Section 7.2.5, due to the marine mammal screening distances provided above the following MPA will also need to be considered in the HRA: the Skerries and Causeway SAC.   | As there are no marine projects proposed by the Plan and as there are no intended or reasonably foreseeable marine works, the potential impact pathway of underwater (subsea) noise capable of causing injury or disturbance to marine mammals is not considered further. As such, marine mammal qualifying interests of the Strangford Lough SAC, North Channel SAC, The Maidens SAC, Murlough SAC and Skerries and Causeway SAC are not considered further in the HRA   |
| 51  | DAERA - Marine Conservation Branch | Environmental Report       | For Section 7.2.5, the following Regional Seascape Character Areas need to be considered: Foyle Estuary and Lough Foyle.  | The SEA ER has been amended to reference potential temporary impacts on Foyle Estuary and Lough Foyle SCAs in Section 7.2.5 and Appendix D F5. Note that this has not changed the assessment outcome.   |
| 52  | DAERA - Marine Conservation Branch | HRA / Environmental Report | For Section 7.2.7, the East Coast Marine pSPA also needs to be considered. In addition, due to the marine mammal screening distances provided above the following MPAs will also need to be considered in the HRA: The Maidens SAC and The Skerries and Causeway SAC. | East Coast (Northern Ireland) Marine SPA considered in HRA. As there are no marine projects proposed by the Plan and as there are no intended or reasonably foreseeable marine works, the potential impact pathway of underwater (subsea) noise capable of causing injury or disturbance to marine mammals is not considered further. As such, marine mammal qualifying interests of the Strangford Lough SAC, North Channel SAC, The Maidens SAC, Murlough SAC and Skerries and Causeway SAC are not considered further in the HRA |
| 53  | DAERA - Marine Conservation Branch | Environmental Report       | In Section 7.2.7, Larne Lough Regional Seascape Character Area needs to be considered.  | The SEA ER has been amended to reference potential temporary impacts on Larne Lough SCA in Section 7.2.7 and Appendix D F7.   |
| 54  | DAERA - Marine Conservation Branch | HRA / Environmental Report | For Section 7.2.9, due to the marine mammal screening distances provided above the following MPA will also need to be considered in the HRA: The Skerries and Causeway SAC.   | As there are no marine projects proposed by the Plan and as there are no intended or reasonably foreseeable marine works, the potential impact pathway of underwater (subsea) noise capable of causing injury or disturbance to marine mammals is not considered further. As such, marine mammal qualifying interests of the Strangford Lough SAC, North Channel SAC, The Maidens SAC, Murlough SAC and Skerries and Causeway SAC are not considered further in the HRA   |
| 55  | DAERA - Marine Conservation Branch | Environmental Report       | For Section 7.2.9, the following Regional Seascape Character Areas need to be considered: Foyle Estuary and Lough Foyle   | The SEA ER has been amended to reference potential impacts on Foyle Estuary and Lough Foyle SCAs in Section 7.2.9 and Appendix D F9.  |
| 56  | DAERA - Marine Conservation Branch | HRA / Environmental Report | For Section 7.2.10, due to the marine mammal screening distances provided above the following MPAs will also need to be considered in the HRA: North Channel SAC, The Maidens SAC and The Skerries and Causeway SAC.  | As there are no marine projects proposed by the Plan and as there are no intended or reasonably foreseeable marine works, the potential impact pathway of underwater (subsea) noise capable of causing injury or disturbance to marine mammals is not considered further. As such, marine mammal qualifying interests of the Strangford Lough SAC, North Channel SAC, The Maidens SAC, Murlough SAC and Skerries and Causeway SAC are not considered further in the HRA   |
| 57  | DAERA - Marine Conservation Branch | Environmental Report       | For Section 7.2.10, the following Regional Seascape Character Areas need to be considered: Belfast Harbour and Belfast Lough.   | The SEA ER has been amended to reference potential impacts on Belfast Harbour and Lough SCAs in Section 7.2.10 and Appendix D F10.  |



| No. | Respondent                         | Document                   | Comment   | Action  |
|-----|------------------------------------|----------------------------|---|---|
| 58  | DAERA - Marine Conservation Branch | HRA / Environmental Report | For Section 7.2.12, due to the marine mammal screening distances provided above the following MPAs will also need to be considered in the HRA: The Skerries and Causeway SAC.   | As there are no marine projects proposed by the Plan and as there are no intended or reasonably foreseeable marine works, the potential impact pathway of underwater (subsea) noise capable of causing injury or disturbance to marine mammals is not considered further. As such, marine mammal qualifying interests of the Strangford Lough SAC, North Channel SAC, The Maidens SAC, Murlough SAC and Skerries and Causeway SAC are not considered further in the HRA |
| 59  | DAERA - Marine Conservation Branch | Environmental Report       | For Section 7.1.12, the following Regional Seascape Character Areas need to be considered: Foyle Estuary and Lough Foyle.   | The SEA ER has been amended to reference potential impacts on Foyle Estuary and Lough Foyle SCAs in Section 7.2.9 and Appendix D F9.  |
| 60  | DAERA - Marine Conservation Branch | HRA / Environmental Report | For Section 7.2.21, due to the marine mammal screening distances provided above the following MPA will also need to be considered in the HRA: The Skerries and Causeway SAC.  | As there are no marine projects proposed by the Plan and as there are no intended or reasonably foreseeable marine works, the potential impact pathway of underwater (subsea) noise capable of causing injury or disturbance to marine mammals is not considered further. As such, marine mammal qualifying interests of the Strangford Lough SAC, North Channel SAC, The Maidens SAC, Murlough SAC and Skerries and Causeway SAC are not considered further in the HRA |
| 61  | DAERA - Marine Conservation Branch | Environmental Report       | For Section 7.2.21, the following Regional Seascape Character Areas need to be considered: Foyle Estuary and Lough Foyle  | The SEA ER has been amended to reference potential impacts on Foyle Estuary and Lough Foyle SCAs in Section 7.2.21 and Appendix D F21.  |
| 62  | DAERA - Marine Conservation Branch | Environmental Report       | In Section 8.1.2, we advise that depending on the presence of seal haul-outs, and the potential for disturbance to marine mammals, a marine mammal observer may be required.  | We have amended Section 8.1.2, as recommended, in the SEA ER. Note that no marine works are proposed in this TDP and a caveat of 'where applicable' has been added to any marine mitigation in Table 8.1. SONI have updated Section 10 of the TDPNI to reflect amendments to Section 8 of the SEA ER.   |
| 63  | DAERA - Marine Conservation Branch | Environmental Report       | In Table 8-1, For 1, we advise that depending on the presence of seal haul-outs, and the potential for disturbance to marine mammals, a marine mammal observer might be required.   | We have amended Table 8-1, as recommended, in the SEA ER. Note that no marine works are proposed in this TDP and a caveat of 'where applicable' has been added to any marine mitigation in Table 8.1. SONI have updated Section 10 of the TDPNI to reflect amendments to Section 8 of the SEA ER.   |
| 64  | DAERA - Marine Conservation Branch | Environmental Report       | In Table 8-1, For 4, we advise also considering the potential for introducing and/or spreading of marine invasive non-native species.   | We have amended Table 8-1, as recommended, in the SEA ER. Note that no marine works are proposed in this TDP and a caveat of 'where applicable' has been added to any marine mitigation in Table 8.1. SONI have updated Section 10 of the TDPNI to reflect amendments to Section 8 of the SEA ER.   |
| 65  | DAERA - Marine Conservation Branch | Environmental Report       | In Table 8-1, For 5, we advise irrelevant of whether invasive non-native species are present on site a biosecurity protocol should be created and implement to prevent the introduction and/or spread of invasive non-native species. | We have amended Table 8-1, as recommended, in the SEA ER. Note that no marine works are proposed in this TDP and a caveat of 'where applicable' has been added to any marine mitigation in Table 8.1. SONI have updated Section 10 of the TDPNI to reflect amendments to Section 8 of the SEA ER.   |



| No. | Respondent                         | Document             | Comment   | Action  |
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| 66  | DAERA - Marine Conservation Branch | Environmental Report | In Table 8-1, For 8, we advise the following updated screening distances: - all SACs within 100km of the project should be screened for Grey seals ( <i>Halichoerus grypus</i> ) - all SACs within 50km should be screened for Harbour seals ( <i>Phoca vitulina</i> ) - all SACs within 100km should be screened for Harbour porpoise ( <i>Phocoena phocoena</i> ) | We have amended Table 8-1, as recommended, in the SEA ER. Note that no marine works are proposed in this TDP and a caveat of 'where applicable' has been added to any marine mitigation in Table 8.1. SONI have updated Section 10 of the TDPNI to reflect amendments to Section 8 of the SEA ER.   |
| 67  | DAERA - Marine Conservation Branch | HRA                  | In Section 2.3, we recommend also using the DAERA Marine Map Viewer as a source.  | Comment noted. No action required.  |
| 68  | DAERA - Marine Conservation Branch | HRA                  | In Section 3.2, for ENVP2 we recommend also including the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended) and The Wildlife (Northern Ireland) Order 1985 (as amended)  | Note that these are Plan Objectives and Policies, and the SEA is considering their compatibility with the SEOs. SONI have amended this policy. We have included this amendment in the SEA ER.   |
| 69  | DAERA - Marine Conservation Branch | HRA                  | In Section 3.2, for ENVP3, where relevant we also advise considering MCZs   | Note that these are Plan Objectives and Policies, and the SEA is considering their compatibility with the SEOs. SONI have amended this policy. We have included this amendment in the SEA ER.   |
| 70  | DAERA - Marine Conservation Branch | HRA                  | In Section 3.2, for ENVO4 we advise including Regional Seascape Character Areas.  | Note that these are Plan Objectives and Policies, and the SEA is considering their compatibility with the SEOs. SONI have amended this objective. We have included this amendment in the SEA ER.  |
| 71  | DAERA - Marine Conservation Branch | HRA                  | In Section 3.2 under Noise, we recommend considering construction noise for marine mammals and also consider the impacts of EM on species.  | As there are no marine projects proposed by the Plan and as there are no intended or reasonably foreseeable marine works, the potential impact pathway of underwater (subsea) noise capable of causing injury or disturbance to marine mammals is not considered further. As such, marine mammal qualifying interests of the Strangford Lough SAC, North Channel SAC, The Maidens SAC, Murlough SAC and Skerries and Causeway SAC are not considered further in the HRA |
| 72  | DAERA - Marine Conservation Branch | HRA                  | In table 4-1, the East Coast Marine pSPA and Carlingford Marine pSPA should be considered.  | East Coast Marine pSPA and Carlingford Marine pSPA already considered and shown with correct boundaries in HRA  |
| 73  | DAERA - Marine Conservation Branch | HRA                  | Section 4.4.3, we advise that disturbance could potentially be caused to some species of elasmobranch from the EM cables while in operation   | Comment noted, however as Elasmobranchs are not a designation feature, they have not been included in the HRA   |
| 74  | DAERA - Marine Conservation Branch | HRA                  | Table 4.4, for the North Antrim Coast SAC, the qualifying interest feature Vegetated sea cliffs of the Atlantic and Baltic coasts should be included.   | Table 4.1 of HRA updated  |
| 75  | DAERA - Marine Conservation Branch | HRA                  | In Table 4.4, for Strangford Lough SAC we advise the consideration of the following qualifying interest needs to be considered: Annual vegetation of drift lines, Perennial vegetation of stony banks, Salicornia and other annuals colonizing mud and sand and Atlantic salt meadows ( <i>Glauco-Puccinellietalia maritime</i> ).                                  | Table 4.1 of HRA updated  |
| 76  | DAERA - Marine Conservation Branch | HRA                  | In Table 4.4, we advise that the North Channel cSAC needs to be updated to its full conservation status of North Channel SAC.   | HRA amended to refer to SAC and not cSAC  |
| 77  | DAERA - Marine Conservation Branch | HRA                  | In Table 4.4, the East Coast Marine SPA is still a pSPA   | HRA amended to refer to SPA and not pSPA  |

| No. | Respondent                         | Document | Comment   | Action  |
|-----|------------------------------------|----------|---|---|
| 78  | DAERA - Marine Conservation Branch | HRA      | In Table 4.6 we refer back to the aforementioned screening ranges for marine mammals and that consequently the following should be amended:                           | As there are no marine projects proposed by the Plan and as there are no intended or reasonably foreseeable marine works, the potential impact pathway of underwater (subsea) noise capable of causing injury or disturbance to marine mammals is not considered further. As such, marine mammal qualifying interests of the Strangford Lough SAC, North Channel SAC, The Maidens SAC, Murlough SAC and Skerries and Causeway SAC are not considered further in the HRA |
| 79  | DAERA - Marine Conservation Branch | HRA      | Ballylumford – Eden circuit update, also needs to consider the North Channel SAC, the Maidens SAC and the Skerries and Causeway SAC for disturbance to marine mammals | As there are no marine projects proposed by the Plan and as there are no intended or reasonably foreseeable marine works, the potential impact pathway of underwater (subsea) noise capable of causing injury or disturbance to marine mammals is not considered further. As such, marine mammal qualifying interests of the Strangford Lough SAC, North Channel SAC, The Maidens SAC, Murlough SAC and Skerries and Causeway SAC are not considered further in the HRA |
| 80  | DAERA - Marine Conservation Branch | HRA      | Coolkeeragh-Magherafelt also needs to consider the Skerries and Causeway SAC for disturbance to marine mammals.   | As there are no marine projects proposed by the Plan and as there are no intended or reasonably foreseeable marine works, the potential impact pathway of underwater (subsea) noise capable of causing injury or disturbance to marine mammals is not considered further. As such, marine mammal qualifying interests of the Strangford Lough SAC, North Channel SAC, The Maidens SAC, Murlough SAC and Skerries and Causeway SAC are not considered further in the HRA |
| 81  | DAERA - Marine Conservation Branch | HRA      | RP6 110kV tower, also needs to consider the North Channel SAC, the Maidens SAC and the Skerries and Causeway SAC for disturbance to marine mammals                    | As there are no marine projects proposed by the Plan and as there are no intended or reasonably foreseeable marine works, the potential impact pathway of underwater (subsea) noise capable of causing injury or disturbance to marine mammals is not considered further. As such, marine mammal qualifying interests of the Strangford Lough SAC, North Channel SAC, The Maidens SAC, Murlough SAC and Skerries and Causeway SAC are not considered further in the HRA |
| 82  | DAERA - Marine Conservation Branch | HRA      | Castlereagh – Rosebank Tower line also needs to consider the North Channel SAC, the Maidens SAC and the Skerries and Causeway SAC for disturbance to marine mammals.  | As there are no marine projects proposed by the Plan and as there are no intended or reasonably foreseeable marine works, the potential impact pathway of underwater (subsea) noise capable of causing injury or disturbance to marine mammals is not considered further. As such, marine mammal qualifying interests of the Strangford Lough SAC, North Channel SAC, The Maidens SAC, Murlough SAC and Skerries and Causeway SAC are not considered further in the HRA |
| 83  | DAERA - Marine Conservation Branch | HRA      | Coolkeeragh-Strabane also needs to consider the Skerries and Causeway SAC for disturbance to marine mammals.  | As there are no marine projects proposed by the Plan and as there are no intended or reasonably foreseeable marine works, the potential impact pathway of underwater (subsea) noise capable of causing injury or disturbance to marine mammals is not considered further. As such, marine mammal qualifying interests of the Strangford Lough SAC, North Channel SAC, The Maidens SAC, Murlough SAC and Skerries and Causeway SAC are not considered further in the HRA |

| No. | Respondent                         | Document | Comment   | Action  |
|-----|------------------------------------|----------|---|---|
| 84  | DAERA - Marine Conservation Branch | HRA      | Coolkeeragh-Limavady also needs to consider the Skerries and Causeway SAC for disturbance to marine mammals.  | As there are no marine projects proposed by the Plan and as there are no intended or reasonably foreseeable marine works, the potential impact pathway of underwater (subsea) noise capable of causing injury or disturbance to marine mammals is not considered further. As such, marine mammal qualifying interests of the Strangford Lough SAC, North Channel SAC, The Maidens SAC, Murlough SAC and Skerries and Causeway SAC are not considered further in the HRA |
| 85  | DAERA - Marine Conservation Branch | HRA      | Ballylumford- Ballyvallyagh, also needs to consider the North Channel SAC, the Maidens SAC and the Skerries and Causeway SAC for disturbance to marine mammals. | As there are no marine projects proposed by the Plan and as there are no intended or reasonably foreseeable marine works, the potential impact pathway of underwater (subsea) noise capable of causing injury or disturbance to marine mammals is not considered further. As such, marine mammal qualifying interests of the Strangford Lough SAC, North Channel SAC, The Maidens SAC, Murlough SAC and Skerries and Causeway SAC are not considered further in the HRA |
| 86  | DAERA - Marine Conservation Branch | HRA      | New North West 110kv also needs to consider the Skerries and Causeway SAC for disturbance to marine mammals.  | As there are no marine projects proposed by the Plan and as there are no intended or reasonably foreseeable marine works, the potential impact pathway of underwater (subsea) noise capable of causing injury or disturbance to marine mammals is not considered further. As such, marine mammal qualifying interests of the Strangford Lough SAC, North Channel SAC, The Maidens SAC, Murlough SAC and Skerries and Causeway SAC are not considered further in the HRA |
| 87  | DAERA - Marine Conservation Branch | HRA      | Energising Belfast, also needs to consider the North Channel SAC, the Maidens SAC and the Skerries and Causeway SAC for disturbance to marine mammals           | As there are no marine projects proposed by the Plan and as there are no intended or reasonably foreseeable marine works, the potential impact pathway of underwater (subsea) noise capable of causing injury or disturbance to marine mammals is not considered further. As such, marine mammal qualifying interests of the Strangford Lough SAC, North Channel SAC, The Maidens SAC, Murlough SAC and Skerries and Causeway SAC are not considered further in the HRA |
| 88  | DAERA - Marine Conservation Branch | HRA      | Carnmoney Eden Reinforcement, also needs to consider the North Channel SAC, the Maidens SAC and the Skerries and Causeway SAC for disturbance to marine mammals | As there are no marine projects proposed by the Plan and as there are no intended or reasonably foreseeable marine works, the potential impact pathway of underwater (subsea) noise capable of causing injury or disturbance to marine mammals is not considered further. As such, marine mammal qualifying interests of the Strangford Lough SAC, North Channel SAC, The Maidens SAC, Murlough SAC and Skerries and Causeway SAC are not considered further in the HRA |
| 89  | DAERA - Marine Conservation Branch | HRA      | Moyle Interconnector, also needs to consider the North Channel SAC, the Maidens SAC and the Skerries and Causeway SAC for disturbance to marine mammals.        | As there are no marine projects proposed by the Plan and as there are no intended or reasonably foreseeable marine works, the potential impact pathway of underwater (subsea) noise capable of causing injury or disturbance to marine mammals is not considered further. As such, marine mammal qualifying interests of the Strangford Lough SAC, North Channel SAC, The Maidens SAC, Murlough SAC and Skerries and Causeway SAC are not considered further in the HRA |
| 90  | DAERA - Marine Conservation Branch | HRA      | In Section 5.1.1.3, we advise also considering the introduction of marine invasive non-native species, where relevant   | Section 5.1.1.3 of HRA reworded to include possibility of spread of invasive species by sea.  |

| No. | Respondent                               | Document             | Comment  | Action  |
|-----|--|----------------------|--|---|
| 91  | DAERA - Marine Conservation Branch       | HRA                  | In Section 5.1.2.1, we advise that changes in sedimentation along the coast could have potential impacts on Annex I habitats through smothering such as 'Reefs' as well as have the potential to impact coastal processes and therefore affect the associated habitats and species such as 'sandbanks'   | Section 5.1.2.1 of HRA reworded to include this possibility.  |
| 92  | DAERA - Marine Conservation Branch       | HRA                  | In Section 5.1.2.2, we advise pollution standing advice is adhered to: standing advice for development that may have an effect on the water environment (including groundwater and fisheries)  | HRA includes this in mitigation section   |
| 93  | DAERA - Marine Conservation Branch       | HRA                  | In Section 5.1.3, where relevant we advise the potential impact of construction disturbance is considered for marine mammals. In addition, we advise the potential impact of EM from cables is considered  | As there are no marine projects proposed by the Plan and as there are no intended or reasonably foreseeable marine works, the potential impact pathway of underwater (subsea) noise capable of causing injury or disturbance to marine mammals is not considered further. As such, marine mammal qualifying interests of the Strangford Lough SAC, North Channel SAC, The Maidens SAC, Murlough SAC and Skerries and Causeway SAC are not considered further in the HRA |
| 94  | DAERA - Marine Conservation Branch       | HRA                  | In table 5-1, we recommend also considering the Climate Change Act (Northern Ireland) 2022.  | In combination effects of legislation not part of scope of HRA or settled case law relating to HRA.   |
| 95  | DAERA - Marine Conservation Branch       | HRA                  | In Table 5.3, we recommend considering: o Local development plans o The All Ireland Rail Review o Living with Water Programme o Strategic Planning Policy Statement 2015   | We are content with the broad scope of the in combination assessment of plans already included in HRA   |
| 96  | DAERA - Marine Conservation Branch       | HRA                  | In Section 6.2.1.1, we advise that a biosecurity protocol should be created and adhered to regardless of whether invasive non-native species have been recorded on site  | Section 6.2.1 of HRA amended to include this  |
| 97  | DAERA - Marine Conservation Branch       | HRA                  | In Section 6.2.3.3, we welcome the adhered to the JNCC protocol. In addition, advise that the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 should be considered   | Section 6.2.3.3 amended to reflect this.  |
| 98  | DAERA - Marine Historic Environment Team | Environmental Report | Page xiii - Cultural, Architectural & Archaeological Heritage – The historic wreck numbers have recently been updated (August of this year); there are 382 identified aircraft wrecks and shipwrecks. There are also 12 protected wrecks; 3 shipwrecks which are scheduled under the HMAOO NI 1995 (HMS Drake, Lochgarry and Devereux), 1 Shipwreck (La Girona) which is protected under the Protection of Wrecks Act 1973 and 8 military aircraft protected under the Protection of Military Remains Act. This section should be amended accordingly and the current GIS datasets obtained from the Department for Communities Historic Environment Division - heroni@communities-ni.gov.uk | We have amended this in the Non-technical Summary and Section 3.3.8.1 of the baseline in the SEA ER.  |
| 99  | DAERA - Marine Historic Environment Team | Environmental Report | The plans presented have limited interaction with the marine area and as such the SEA is sufficiently robust in respect of marine cultural heritage assets. Please refer to the DfC Historic Environment Divisions detailed response in respect of terrestrial Cultural Heritage.  | Comment noted. No action needed   |
| 100 | DAERA - Marine Planning Team             | Environmental Report | Many of the projects indicate 'there are unlikely to be any impacts on water status'. It is unclear if this assessment conclusion includes coastal and marine waters from a UK Marine Strategy perspective and the achievement of good environmental status; as often the corresponding baseline only refers to WFD status with regard to transitional and coastal waters. This highlights a disconnect between the environmental baseline and conclusions of the assessment, with the Strategic Environmental Objectives, sub-objectives and targets (which   | We have referenced MS status in the assessments, where relevant.  |

| No. | Respondent                          | Document             | Comment   | Action  |
|-----|-------------------------------------|----------------------|---|---|
|     |                                     |                      | the various projects within the Draft Transmission Development Plan are being assessed against in the Environmental Report) and the monitoring outlined in relation to the Water theme. Whilst there is overlap between WFD and the UK Marine Strategy, not all elements of the UK Marine Strategy are covered by WFD.  |   |
| 101 | DfC - Historic Environment Division | Environmental Report | HED welcomes where our comments provided at the scoping stage have been taken into account and considers the report provides a thorough assessment of the potential effects of the plan on the historic environment, including transboundary considerations. We defer comment on the project specific impacts outlined in the appendices, for consideration through the EIA process at the project specific stage but offer the following advice to further inform the strategic environmental assessment in relation to cultural heritage.   | Comment noted. No action needed   |
| 102 | DfC - Historic Environment Division | Environmental Report | Table 3.1 - Statistics in relation to heritage assets continue to evolve as new designations are taken forward and as new records are added or as existing records are augmented. HED therefore highlights the importance utilizing our historic environment evidence bases to provide an accurate assessment of potential effects of the plan on the historic environment. Our digital datasets which include recorded designated and non-designated heritage assets, are available to download at: <a href="https://www.communities-ni.gov.uk/publications/historic-environment-digitaldatasets">https://www.communities-ni.gov.uk/publications/historic-environment-digitaldatasets</a> . This data can also be accessed via our Historic Environment Map Viewer <a href="https://www.communities-ni.gov.uk/services/historic-environment-map-viewer">https://www.communities-ni.gov.uk/services/historic-environment-map-viewer</a> . We would highlight the value of our excavations layers going forward to project specific stage as further indicators of locations where there is a high potential to encounter previously unidentified archaeological remains -e.g. along Island Magee. We also highlight that the number of Areas of Significant Archaeological Interest now sits at 11, and there is a high likelihood of further designations of these assets or extensions to existing designations as the Local Development Plan process progresses. These assets will normally have bespoke local policies to protect their historic characteristics. | We note that this is a summary of the State of the Environment report for NI. Further, more up to date, information has been provided in Section 3.3.8. We have updated the ASAI to 11 in the baseline Section 3.3.8.   |
| 103 | DfC - Historic Environment Division | Environmental Report | Table 3.2 HED consider it would be useful to have cultural heritage or landscape in this table, both of which would have transboundary relevance with respect to the Transmission Development Plan, as is well articulated in 3.3.8.  | We note that Table 3.2 is a summary taken from the State of the Environment report for RoI. We have reviewed this report - there is some information available on landscape, which we have added to Table 3.2 of the SEA ER. There is no reference to cultural heritage in this report. |
| 104 | DfC - Historic Environment Division | Environmental Report | Para 3.3.8 The key issues table should be updated to reflect the potential effects of the plan on cultural heritage, whilst also acknowledging the interrelationship between the historic environment and landscape and the potential for shared impacts. At present these appear to iterate the key issues specific to landscape alone.  | We have amended this text in the baseline section of the SEA ER.  |
| 105 | DfC - Historic Environment Division | Environmental Report | 3.3.8.1 HED highlights that Gracehill is currently on the WHS tentative list as part of a transnational bid of Moravian Church Settlements. If the nomination is successful, Gracehill would be Northern Ireland's first cultural heritage World Heritage Site and therefore potential impacts of the plan on the site would require review in accordance with planning policy requirements   | We have referenced this site in the baseline Section 3.3.8.1 and in the assessment for project 14 Mid Antrim Upgrade of the SEA ER.   |

| No. | Respondent                          | Document             | Comment  | Action   |
|-----|-------------------------------------|----------------------|--|--|
| 106 | DfC - Historic Environment Division | Environmental Report | 3.3.8.1 We welcome the consideration of the potential of impact on previously unidentified below ground remains through groundworks, particularly for cabling. HED reiterate the importance of considering this potential at project specific stage. Assets such as historic graveyards with early origins are often physically defined by relatively late boundary walls which may not encompass their full extent, and HED have at various times in the past had to attend to circumstances where remains have been uncovered in the environs or streetscapes of such sites.   | We have added specific reference to this in Table 8-1, mitigation 28 of the SEA ER. SONI have updated Section 10 of the TDPNI to reflect amendments to Section 8 of the SEA ER.  |
| 107 | DfC - Historic Environment Division | Environmental Report | Table 5.3 This table helpfully sets out the compatibility between the SEA Objectives and the Transmission Development Plan NI (TDPNI) objectives. It would however also be beneficial to illustrate by way of a table, the interrelationships between the SEA topics, outlining the common natural and historic environment synergies, for example in relation to biodiversity and landscape character, which should be duly reflected in the assessment of potential effects of the plan.   | We have added the table of interrelationships between SEA topics to the SEA ER, as Table 5-5. We note that this table was included in the SEA Scoping report.  |
| 108 | DfC - Historic Environment Division | Plan and SEA         | Table 5.4 Sets out the TDPNI objectives aligned to Cultural Heritage SEA Objectives, though HED considers that the cited ENVP8 test of 'reasonable measures' will not provide appropriate protection for listed assets against potential effects of the plan. HED therefore advise that ENVP8 should be revised to outline that '...appropriate measures.' will be taken to ensure the protection of assets of special architectural and historic interest when considering site or route options. We also advise that the word sites should be included after protected as well (i.e. "protected sites and structures" so that due cognizance is afforded to scheduled or state care monuments which may not always have above ground elements.   | SONI have amended this policy. We have included this amendment in the SEA ER.  |
| 109 | DfC - Historic Environment Division | Plan and SEA         | Table 5.4 We further advise that account should also be taken of the setting of archaeological remains under the wording of ENVP9 in this table. (**NB. HED consider that correction is required to this table - the cultural heritage ENVP nos. in Table 5.4 (EVNP 8 & 9) do not appear to align with the numbers afforded in Table 2-1 where the wording for cultural heritage objectives is outlined under ENVP 9 and 10)   | SONI have amended this policy. We have included this amendment in the SEA ER. We have amended the numbering in Table 5.4 of the SEA ER.  |
| 110 | DfC - Historic Environment Division | Plan and SEA         | Table 5.4 HED considers ENVO4 in respect of historic landscape character, particularly in relation to ASAI's and the setting of heritage assets, will also be relevant in relation to cultural heritage. HED also considers that the environmental objectives of the plan should demonstrate appropriate consideration of impacts for non-designated heritage assets aligned with the hierarchy of planning policy protection.   | SONI have amended this objective. We have included this amendment in the SEA ER. We have included ENVO4 in the discussion for cultural heritage in Table 5.4 of the SEA ER.  |
| 111 | DfC - Historic Environment Division | Environmental Report | Table 5-5 - HED requests that Conservation Areas of special architectural and historic interest are included in the constraints model with a score reflective of the statutory designation. As previously advised in our scoping comments, HED consider that the constraint scoring for scheduled monuments and listed buildings as statutorily designated assets with specific consenting regimes (in the case of scheduled monuments wholly separate to planning approvals) should be higher and the modelling should consider the tiered policy approaches to assets as articulated in regional planning policy within the SPPS, PPS6 and Council Plan Strategies, where these have been adopted. ASAI should also be scored appropriately given the policy weight afforded to these specific designations. | We have searched for available data on Conservation Areas. This data does not exist currently as a nationally available dataset. We have included as a recommendation for future working in Section 5.4 Difficulties and Data Gaps, as LAPs are not available digitally. |

| No. | Respondent                             | Document             | Comment   | Action  |
|-----|--|----------------------|---|---|
| 112 | DfC - Historic Environment Division    | Environmental Report | Table 7-1 HED considers that the potential negative effects for Cultural Heritage during the Operational Phase should recognize the potential for long term effects on 'heritage assets' in line with cultural heritage monitoring indicators in Table 8.3. The term 'local' infers impacts relate to assets of local interest, when the implementation of the plan has the potential to effect, assets of national, regional and local significance  | We have amended the text in Table 7-1 of the SEA ER, as suggested.  |
| 113 | DfC - Historic Environment Division    | Environmental Report | Table 8-1 In respect of mitigation measures for potential effects No. 26 and No. 27, utilization of the historic environment evidence bases will help inform how the potential effects can be avoided, or where following consideration of alternative options they cannot be avoided, are appropriately mitigated against as outlined in the report.   | We have amended the text in the mitigation section of the SEA ER, as suggested. SONI have updated Section 10 of the TDPNI to reflect amendments to Section 8 of the SEA ER.   |
| 114 | Causeway Coast & Glens Borough Council | Plan and SEA         | We would have some concern that the strategic direction of the Plan will result in a disproportionate level of development being focused within the northwest Planning Area. The projects outlined in the Plan will support and promote significant growth in the renewables sector, with most of the renewable infrastructure located within the northwest planning area. Section 7 of the Plan describes the northwest planning area as "characterised by a significant amount of wind generation, with more generation than demand". It goes on to state: "Significant further generation is expected in this area over the coming years, most, if not all, of which is expected to be renewable in order to meet the 80% target. To cater for the high levels of generation described above network reinforcement is necessary. This will enable the efficient export of generation from this area towards areas with high load, such as the South-East". There is no evidence to support the assumption that significant further generation is expected in this area over the coming years. Yet justification for the projects outlined in the plan are repeatedly described as, "As a result of increasing growth in renewable generation in the northwest of NI there will be a need to....". Given that the area has more generation than demand, it is highly unlikely that the area will see increased generation without the infrastructure projects outlined in the dTDPNI. | SONI is seeking to facilitate the NI Executive's target of up to 80% renewable energy by 2030. The Transmission Development Plan (TDP) does seek to facilitate the connection of more renewable energy to the grid, as well as strengthening supply to all areas in Northern Ireland, and helping to lower electricity prices. The locating and approval of new generation projects are outside of SONI's area of responsibility and will be subject to normal planning requirements and should be prepared in-line with Regional Strategies, Local Area Plans, and other requirements. The TDP will not be directly responsible for the development of more generation in the area. The TDP has been prepared to take account of existing areas of generation and those that are planned, as well as other technical issue (e.g. strengthening supply). SONI recognises that a coordinated approach is required and will be happy to continue to discuss this matter further with the Council. |



| No. | Respondent                             | Document     | Comment   | Action  |
|-----|--|--------------|---|---|
| 115 | Causeway Coast & Glens Borough Council | Plan and SEA | Paragraph 3.5.2 describes the statutory environmental consideration of the Plan and the need for appropriate assessments. The approach focuses on the impact of individual projects. These often fall outside the thresholds outlined in the EIA regulations, with many of the proposed projects being 110kV lines, with the threshold set at 220kV. It is important to consider that subsequent applications for renewable energy will be a direct result of the dTDPNI and should be assessed within the SEA.   | In-line with The Environmental Assessment of Plans and Programmes Regulations (Northern Ireland) 2004 legislation, the Transmission Development Plan has been subject to a Strategic Environmental Assessment (SEA). The SEA seeks to outline the environmental and social effects of the Plan (both positive and negative) and propose mitigation measures to minimise or avoid the negative effects. As with all SEAs, it would not be possible to assess all individual projects within the Plan as there is separate planning and environmental legislation to address individual projects. In addition, the strategic level of the Plan will mean that not all point of details of individual projects are available for assessment within the SEA. Individual projects will be assessed through the planning requirements applicable to each project. Where a project is sub-threshold EIA, there will be an assessment of the suitability of the project and the developer will work with the planning authority to scope that assessment. On grid development projects (e.g. 110 kV and 275 kV projects), where SONI has developed and is responsible for the planning of the project, SONI will screen the projects for the requirement for EIA. Where a project is identified to be sub-threshold and not requiring an EIA, SONI will still prepare an assessment of the environmental and social effects of the project. This report will be scoped in consultation with the local council and other key stakeholders to ensure that any concerns are addressed. This assessment will address the environmental and social effects of the project and include an assessment of the cumulative effects with other projects. |
| 116 | Causeway Coast & Glens Borough Council | Plan and SEA | The general location of renewable energy development will largely be predetermined by the availability of infrastructure to transport and deliver the generated electricity to areas with high load, such as the southeast or beyond via the Moyle interconnector. The fragmented nature of the renewable energy industry and the way the Plan will be implemented, effectively commits the northwest to the delivery of large-scale energy production, without appropriate assessment of the environmental impacts. This is comparable to assessing the environmental impact of a power station, solely on the impacts of the associated energy transportation infrastructure. | The assessment of all large scale renewable generation will be subject to planning and assessment. The location and approval of renewable generation projects is outside of SONI's area of responsibility but will be a balance of a number of factors including but not limited to: wind/solar levels, availability of land, planning requirements (e.g. Local Area Plans), environmental and social considerations, and connection to the grid.   |
| 117 | Causeway Coast & Glens Borough Council | Plan and SEA | Section 4.1 is entitled, Our Approach to the Environment. It lists SONI's policies and objectives in relation to environmental issues, including Biodiversity, Climate Change and Cultural Heritage. The scope of the impacts is limited to the transmission infrastructure and makes no reference to the development that the infrastructure enables.  | The Plan will not be directly responsible for the development and approval of any infrastructure projects. As identified above, all projects, generation and grid development, will be subject to separate planning processes outside of the TDP. The individual projects will assess any cumulative effects as appropriate and in consultation with the planning authority   |
| 118 | Causeway Coast & Glens Borough Council | Plan and SEA | Paragraph 4.1.7 outlines the policy and objectives of SONI with regards consideration of landscape. The approach again focuses on the appraisal of transmission development in isolation, with no consideration of the associated development over the plan period, and the resulting cumulative impact on the landscape of the northwest.  | The Plan will not be directly responsible for the development and approval of any infrastructure projects. As identified above, all projects, generation and grid development, will be subject to separate planning processes outside of the TDP. The individual projects will assess any cumulative effects as appropriate and in consultation with the planning authority.  |

| No. | Respondent                             | Document     | Comment  | Action   |
|-----|--|--------------|--|--|
| 119 | Causeway Coast & Glens Borough Council | Plan and SEA | In the context of the dTDPNI, the continued relevance of the NI Landscape Character Assessment 2000 as an appropriate evidence base is questionable. The NILCA 2000 and the evidence which supports it were developed over 25 years ago, prior to significant growth in renewable energy infrastructure in the northwest.  | We note that this is the only national assessment of landscape character currently available for NI. We have included as a recommendation for future working in Section 5.4 Difficulties and Data Gaps, as LAPs are not available digitally.   |
| 120 | Causeway Coast & Glens Borough Council | Plan and SEA | The impact of the dTDPNI on the landscape of the northwest will likely be significant. Given the scale of the infrastructure upgrades proposed, and the level of energy generation development required to meet Northern Ireland's energy ambitions, the Plan could significantly alter the landscape character of the area. It would therefore be appropriate for the energy industry to undertake a robust landscape assessment and sensitivity analysis, to determine if the northwest has the capacity to absorb this level of development, prior to the adoption of the plan for the enabling infrastructure.             | The landscape character area assessment have assessed the sensitivity of the LCAs to development. The Plan will operate in the context of local and regional policy with regard to suitability of development. As will the separate generation projects.   |
| 121 | Causeway Coast & Glens Borough Council | Plan and HRA | It is noted that the HRA also looks at projects in isolation, and fails to consider the cumulative impact of associated energy generating development. Given the correlation between the areas of upland often favoured for wind energy development and areas of active peatland, it would be appropriate to undertake a detailed assessment of potential development. A failure to appropriately assess the capacity of the landscape to absorb the levels of energy development required could undermine the objectives of the Climate Change Act, such is the importance of active peatland in sequestering carbon dioxide. | Point noted, but opening paragraphs of Section 6.2 of the HRA point to the project level assessment that will follow on from plan level assessment, and be required in every case. At the project level assessment, a much more focused in-combination assessment will be undertaken by the competent authority, bespoke to that project and will include energy generating development that is already operating, under construction, has received consent and /or is in the consenting system pipeline at that time. Such an assessment will take into account the potential for in combination effects on active peatland in the area of the relevant project under consideration at that time. |
| 122 | Causeway Coast & Glens Borough Council | Plan and SEA | The dTDPNI responds to the oversupply of renewable energy development in the northwest, which has largely been dictated by energy companies seeking to maximise productivity. Given the implications of the plan for the landscape across the northwest this would not appear to be a sound basis for the development of an energy strategy.   | SONI is seeking to facilitate the NI Executive's target of up to 80% renewable energy by 2030. The Transmission Development Plan (TDP) does seek to facilitate the connection of more renewable energy to the grid, as well as strengthening supply to all areas in Northern Ireland, and helping to lower electricity prices. The locating and approval of new generation projects are outside of SONI's area of responsibility and will be subject to normal planning requirements and should be prepared in-line with Regional Strategies, Local Area Plans, and other requirements.  |
| 123 | Causeway Coast & Glens Borough Council | Plan and SEA | There is also no evidence to support the role of the northwest as the focal point of wind energy generation. Available data on wind speed and power reflects a relatively even distribution across Northern Ireland. Whilst the northwest may experience optimal conditions, the data indicates that within the southeast there are comparable conditions which would more than support commercial energy generation.  | This is not an area within SONI's area of responsibility.  |

| No. | Respondent                             | Document     | Comment   | Action  |
|-----|--|--------------|---|---|
| 124 | Causeway Coast & Glens Borough Council | Plan and SEA | Clearly it is more cost effective to concentrate infrastructure in one region as opposed to a balanced distribution which would require additional network infrastructure. However, the long-term implications for both the natural environment and tourism economy have not been fully explored. An even distribution of infrastructure would develop a more secure and robust network, better equipped to absorb potential outages and avoiding overreliance on a particular region or connector. | The Energy Strategy for Northern Ireland – The Path to Net Zero Energy is one such plan that helps to address these concerns. However, there are a number of other plans and development frameworks that are required for a strategic overview as suggested by the Council. While it is outside of the scope of Transmission Development Plan, SONI is happy to play its role and work with the Council and other key stakeholders to address these concerns. |
| 125 | Causeway Coast & Glens Borough Council | Plan and SEA | It is accepted that the targets outlined in the Climate Act place significant pressure on the energy industry to work towards decarbonisation. However, it is worth taking the time to ensure that the measures introduced are achievable without causing lasting detrimental impact.   | SONI agrees with this point and will seek to minimise negative effects as far as possible.  |
| 126 | Causeway Coast & Glens Borough Council | Plan and SEA | Given the importance of this plan in meeting Northern Ireland's energy and climate change ambitions there is perhaps a lack of transparency in relation to the aims and objectives of the Plan. Renewable energy has a critical role to play in the journey to net-zero carbon emissions. However, renewable energy development can be contentious and public opinion on visual impact remains guarded, as was evident during public consultation on the Council's Preferred Options Paper.         | SONI is happy to meet with the Council to discuss further. It is hoped that the responses given have clarified the intent and scope of the Plan.  |
| 127 | Causeway Coast & Glens Borough Council | Plan and SEA | The absence of a strategic energy plan which clearly defines the implications of the dTDPNI limits the conversation. There is perhaps a need for a clear discussion as to whether it is appropriate and fair for the northwest planning area to accommodate the energy generating development to serve the southeast area and beyond, given the potential for visual and general amenity impacts.   | SONI is happy to discuss this with the Council and other key stakeholders.  |

## Abbreviations

|       |   |
|-------|---|
| ATR   | Associated Transmission Reinforcement               |
| DSO   | Distribution System Operator                        |
| EC    | European Commission                                 |
| FAQ   | Firm Access Quantity                                |
| SOEF  | Shaping Our Electricity Future                      |
| SONI  | System Operator Northern Ireland                    |
| TAO   | Transmission Asset Owner                            |
| TDPNI | Transmission Development Plan Northern Ireland      |
| TES   | Tomorrow's Energy Scenarios                         |
| TESNA | Tomorrow's Energy Scenarios Needs Assessment        |
| TIA   | Transmission Interface Arrangements                 |
| TSO   | Transmission System Operator                        |
| TSSPS | Transmission System Security and Planning Standards |
| UR    | Utility Regulator                                   |

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## Glossary

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| Associated Transmission Reinforcement (ATR) | ATRs are the transmission reinforcements that must be completed in order for a generator to be allocated Firm Access Quantity (FAQ). ATRs include reinforcements such as line and busbar upratings, new stations and new lines.  |
| EirGrid                                     | The Transmission System Operator in the Republic of Ireland.   |
| Firm Access Quantity (FAQ)                  | The level of firm financial access available in the transmission network for a generator is that generator's FAQ. Firm financial access means that if the power produced by a generator is constrained up or down, it is eligible for compensation in the manner set out in the Trading and Settlement code. |
| NIE Networks                                | Northern Ireland Electricity Networks, the Transmission Asset Owner, Distribution Asset Owner and Distribution System Operator in Northern Ireland.  |