



Energy for
generations

DCDP 77

ESB Group Property

Longford County Council Draft Development Plan 2021 - 2027

Submission on behalf of ESB to the Longford Draft County Development Plan 2021–2027.
18/01/2021





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1. INTRODUCTION

Electricity Supply Board (ESB) welcomes this opportunity to make a submission to the Longford Draft County Development Plan (CDP) 2021 – 2027. ESB is a landowner and employer in Longford with property and infrastructural assets throughout the County. As a strong, diversified, vertically integrated utility, ESB operates right across the electricity market; from generation, through transmission and distribution to supply of customers. In addition, ESB uses its networks to carry fibre for telecommunications and to provide charging infrastructure for electric vehicles. ESB is Ireland's leading electricity utility with approximately 3.2 million customers throughout the island of Ireland.

ESB has been involved in generation from peat in the Midlands for more than 60 years. In recent years, climate change has come to the fore of public policy, both internationally and nationally and it has been recognised that peat could not continue indefinitely as a fuel for electricity generation. As a result, ESB's Lough Ree Power station at Lanesborough ceased operations and will now be de-commissioned.

ESB supports a 'Just Transition' that includes assistance to regions that are transitioning away from fossil-based industries or other high carbon emitting industries. In recognition of our long-standing engagement with the region, ESB is contributing €5 million to the Just Transition Fund for the Midlands. We recognise that the 'Just Transition' forms a critical element of the Draft CDP and that Longford County Council has a strong reputation in placing climate action at the heart of all policies and strategies. There continues to be significant advancement in renewables technology and outlined below are observations regarding strategic issues that should be taken into consideration in the preparation of the final Longford CDP 2021 - 2027.

1.1 Overview of ESB Strategy

ESB is Ireland's foremost energy company and the largest supplier of renewable electricity in Ireland. Through innovation, expertise and investment, ESB is leading the way in developing a modern, efficient electricity system that is capable of delivering sustainable and competitive energy supplies to customers in the 'all-islands market' (Republic of Ireland, Northern Ireland, England, Wales and Scotland). ESB operates a renewable energy portfolio that has the capacity to supply over 830 MW of green energy to the homes, farms, hospitals, schools and businesses of Ireland and the United Kingdom.

ESB is embracing new technologies that are revolutionising the energy industry, including smarter electricity networks. We are investing in sustainable energy solutions that harnesses the power of solar, wind, wave and storage to provide a cleaner future. Our goal is to reduce ESB's carbon emissions 40% by 2030 and move towards becoming carbon-neutral by 2050. By the end of 2020, ESB will be delivering one-third of its electricity from renewable generation as it progresses towards achieving carbon net-zero operations which is consistent with the objectives of the National Planning Framework (NPF) and Regional Spatial & Economic Strategy (RSES) for the Eastern & Midland Region.

1.2 Generation, Transmission & Distribution

To meet ESB's strategic objective of supporting the decarbonisation of the electricity sector, we are investing in renewable energy assets across a range of technologies including networks, solar energy, onshore & offshore wind energy.

It is our ambition that ESB will generate 40% of our electricity generation from renewable assets by 2030 with 3.5GW of offshore wind, 8.3GW of onshore wind and 1.5GW of solar. We remain committed to completely transforming our generation portfolio, replacing old plant with a mixture of renewables and high efficiency gas.



To support the transition of the National Grid to a low-carbon future ESB is developing assets such as battery storage assets and flexible gas fired units that respond quickly to system demand, which will be key to facilitating large scale renewables in the future.

ESB is the asset owner of the Transmission System and Distribution System and ESB Networks provides the essential service of building, managing and maintaining the electricity networks in Longford and throughout Ireland. ESB Networks is unique in that it is in direct contact with all electricity users. The electricity network extends to over 180,000km across the Republic of Ireland and in 2018 over 26,900 new residential and business connections were completed. The focus of recent investment in the network was on continuing the reinforcement of the system to facilitate the connection of new renewable electricity generation.

1.3 ESB Roll-out of EV Infrastructure & Hydrogen Projects

ESB, has developed a network of almost 1,100 electric vehicle charge points across the Island of Ireland. In the Climate Action Plan (2019) the Irish Government has set stretching targets for EV adoption in Ireland in order to address energy demand and emissions from transport. To help meet this increase in electric vehicles, ESB, with the support of the Government's Climate Action Fund, is rolling out high power charging hubs across the country. These hubs will be capable of quickly charging between two and eight vehicles simultaneously and will facilitate vehicles travelling longer distances across Ireland's National and Motorway routes.

In line with ESB Strategy, we are examining the role ESB could play in a hydrogen economy. This could include the development of Hydrogen projects that are fully aligned with the "EU strategy on energy sector integration" launched in 2020. This prioritises a more 'circular' energy system, with energy efficiency at its core, greater direct electrification of end-use sectors like transport and buildings and using a renewable fuel like hydrogen for end-use applications where direct electrification is not feasible such as heavy goods transport, high temperature industrial heat and the cement/oil industries.

1.4 ESB Telecoms & Telecommunications Infrastructure

ESB Telecoms has grown from its original function of providing a communications system for ESB to become one of Ireland's leading independent telecommunications infrastructure providers with over 400 locations nationwide. ESB Telecoms now provides network solutions for a wide variety of mobile network operators, wireless broadband providers and public sector business activities. All sites developed by ESB Telecoms are made available to third party mobile phone and wireless broadband operators as points for co-location. Our open policy of sharing infrastructure limits the overall number of telecoms structures appearing in urban and rural landscapes.

Our telecoms fibre network wrapped on our 110kV electricity network provides an extensive network throughout Ireland with international connectivity to the UK. In addition, SIRO (a joint venture between ESB and Vodafone) is bringing 100% fibre-to-the-building to 50 towns across Ireland enabling speeds of 1 Gigabit per second. SIRO will continue to accelerate this roll-out in 2021.

2. PLANNING POLICY & THE DRAFT CDP

In reviewing the Draft CDP, ESB has a number of observations in relation to the key issues identified that may set the framework for the future development of the County. ESB acknowledges that the process of preparing a new CDP shall be informed by the hierarchy of planning policy in Ireland. Both the National Planning Framework (NPF) and the Regional Spatial Economic Strategy (RSES) contain policies in relation to Energy Infrastructure.



In addition, we welcome the recognition that the CDP will play an important role in influencing a reduction in Green House Gas (GHG) Emissions by guiding the sustainable growth of the county. ESB is working towards the delivery of Ireland's target (part of the pledged EU target) of at least 40% reduction in domestic GHG emissions by 2030 compared to 1990 levels.

The Draft National Energy and Climate Plan envisages a target of at least 55% renewable energy in electricity by 2030. In 2019, the Minister of Communications, Climate Action and Environment committed to raise the amount of electricity generated from renewable sources to 70% by 2030 with no generation from peat and coal in the Climate Action Plan. This ambition is needed to honour the Paris Agreement. It represents a significant change for the electricity industry and ESB is committed to doing its part in supporting and delivering on the Government's energy policy. We acknowledge the Longford Climate Change Adaptation Strategy 2019-2024 the recognition in the Draft CDP that it is a County Policy Objective (CPO 3.3) of Longford County Council, to;

"Support the implementation and adoption of the Longford County Council Climate Change Adaptation Strategy and promote the County as a key driver of the transition to a low carbon economy within the Region."

ESB supports a new CDP which will include policies and objectives that support the delivery of infrastructure to meet future energy needs.

2.1 Electricity Transmission & Distribution

Both the NPF and the RSES contain promoting policies in relation to Energy Infrastructure and ESB fully supports the reinforcement of those policies at a local level. Policy Objective CPO 5.119, set out in Chapter 5 – *Transport, Infrastructure, Energy and Communications* states;

"Support and promote the sustainable improvement and expansion of the electricity transmission and distribution network that supply the County, subject to landscape, residential, amenity, environmental and other planning considerations."

The NPF and RSES for the Eastern & Midland Region supports the enhancement and upgrading of existing infrastructure and the safeguarding of strategic energy corridors from encroachment by other developments that would compromise the delivery of energy networks. The new County Development Plan 2021 – 2027 must continue to ensure that the long-term operational requirements of existing utilities are protected.

The Draft CDP, deals with Energy Networks Infrastructure under Section 5.7 and it supports development of a secure and reliable transmission network, ensuring that Longford has the necessary infrastructure to accommodate and promote economic growth, attract investment to the area and facilitate the development of the County in line with the Core and Settlement Strategies. Given the role of former Lough Ree Power Station, the County is well served with transmission infrastructure, However, there is an acknowledgement that the upgrading of the transmission network will facilitate power flows from both renewable and conventional sources to maximise the use of existing power corridors. It also seeks to support the safeguarding of strategic route corridors, where appropriate. In this regard, we support the Draft County Plan Objective 5.121 set out in Chapter 5.

CPO 5.121

"Support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the county and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this Strategy, including the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity and gas transmission grid in a sustainable and timely manner subject to appropriate environmental assessment and planning merits."



However, CPO 5.123 gives rise to concern as it restricts the consideration of all options before the details and specific circumstances of individual projects have been evaluated and therefore may prevent implementation of the optimum solution.

CPO 5.123

“Require that the location of local energy services such as electricity, be undergrounded, where appropriate. Where undergrounding of cables is being pursued, proposals should demonstrate that environmental impacts;

- *Habitat loss as a result of removal of field boundaries and hedgerows (right of way preparation) followed by topsoil stripping (to ensure machinery does not destroy soil structure and drainage properties);*
- *Short to medium term impacts on the landscape where, for example, hedgerows are encountered;*
- *Impacts on underground archaeology;*
- *Impacts on soil structure and drainage;*
- *Impacts on surface waters as a result of sedimentation.”*

It is recognised that concerns about visual, amenity, health and safety need to be mitigated through the consultation process. The national planning framework of the NPF, RSES, Local Development Plans and the Strategic Infrastructure Act provides the necessary framework for ensuring that all necessary standards are met, and that extensive statutory and non-statutory consultation is an intrinsic part of the planning process. This ensures that there is ongoing consultation with local communities and local authorities regarding the construction of new networks.

The Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure (July 2012) emphasises the strategic and economic importance of investment in networks and energy infrastructure. Under this policy the Government has mandated the State-owned Networks Companies *“to deliver the State’s network investment programmes in the most cost efficient and timely way possible in the interests of all energy consumers who need the investment and who also pay for it.”*

Restrictive policies which outline the preferred option, as in the case above, in advance of the required analysis and planning process are not consistent with the policies and objectives of the Government which require *“that these investment programmes are delivered in the most cost efficient and timely way possible, on the basis of the best available knowledge and informed engagement on the impacts and the costs of different engineering solutions.”*

In addition, Government policy recognises that public acceptability is required for the delivery of key networks projects and that to achieve public confidence project proposals must adhere to the highest international standards of safety, health and environmental and visual impact, and technology choice. The Government affirms that ESB Networks are obligated to adhere to all relevant guidelines and standards and they act in the national interest, and on behalf of all electricity consumers.

2.2 Generation & Renewables

To achieve a transition to a low carbon, climate resilient and environmentally sustainable economy and in line with the Government’s response to the Climate Change Crisis, ESB is committed to leading the delivery of a low carbon energy sector. We are implementing programmes supporting the Government strategies to reach Ireland’s 2030 reduced emissions targets and increasing renewables in our power system from 30% to at least 55% with a broader range of technologies likely to be deployed, e.g. offshore wind, solar, biomass.



Section 5.8 of the Draft CDP recognises that There is a need for a move from traditional energy generation methods based on the burning of carbon-based fossil fuels, towards a more sustainable, low-carbon based energy generation and overall economy through renewable energy technologies. In this regard, ESB welcome CPO 5.126, which states a commitment to;

“Co-operate and liaise with statutory and other energy providers in relation to power generation, in order to ensure adequate power capacity for the existing and future needs of the county.”

As recognised in the Draft CDP, given the legacy of power generation in the county a move to renewable energy such as wind, solar and biomass will assist in managing the transition of the local economies of such areas in gaining the economic benefits of greener energy. In order to further this aim the development of a Renewable Energy Strategy is an important objective. Therefore, ESB welcome the commitment set out in CPO 5.129 which aims to;

“Prepare a Renewable Energy Strategy for the County over the lifetime of this plan and subject to the availability of resources. This strategy will support the development of renewable energy infrastructure to deliver government objectives in relation to energy efficiency and the transition to a low carbon future.”

The development of a comprehensive Renewable Energy Strategy will provide an opportunity to reinforce the supportive Policy Objectives in the Draft CDP in relation to renewable energy and ensure full alignment with the objectives of the NPF, RSES and national guidelines. However, ESB wish to make some comments in relation to the renewable technologies set out below.

2.2.1 Wind Energy

Based on SEAI analysis, February 2020 provided a record-breaking month with 56% of energy demand met by wind energy, the highest monthly total since records began. In the 12 months to end of January 2020, wind and other renewable sources, hydro, solar and biomass accounted for 37% of demand. This is an encouraging trend, but further acceleration of deployment is necessary to achieve the Government's target for electricity of 70% from renewables by 2030.

Section 5.8.1 – *Wind Energy* recognises the significant contribution that wind energy can make as a clean sustainable solution to energy requirements and its vital role in helping achieve national targets in relation to fossil fuel reductions and consequently greenhouse gas emissions.

Map titled *Areas of Wind Farm Potential* in Appendix 2 of the Draft CDP provides details of the locations in the County suitable for wind energy development. In addition, the Development Management Standards highlight that any application for wind energy development shall be prepared in accordance with the requirements of the Wind Energy Guidelines 2006 and any subsequent Guidelines. This reinforces CPO 5.135 that states;

“Have regard to the principles and planning guidance set out in Department of Housing, Planning and Local Government publications relating to ‘Wind Energy Development’ and the DCCA Code of Practice for Wind Energy Development in Ireland and any other relevant guidance which may be issued in relation to sustainable energy provisions.”

A review of the Wind Energy Development Guidelines 2006 has been underway since 2013. In June 2017 a “preferred draft approach” was jointly announced between the Dept. of Housing, Planning, Community & Local Government (DHPCLG) and the Department of Communications, Climate Action and Environment (DCCA). The recently published Draft Revised Wind Energy Development Guidelines (2019) confirm the “preferred draft approach” which should inform the



planning authority policy for wind energy development. Therefore, it is appropriate that planning policy and development management standards for sustainable wind energy developments are updated where required to reflect the revised guidelines.

ESB also wish to highlight that there is merit in assessing the County Development Plans and Wind Energy Strategies of adjoining counties. It is noted that there is good consistency across County Development Plan's and the Wind Energy Strategies of some counties. However, there is scope to improve on this consistency further in order to facilitate the development of windfarms across county boundaries. Implementation of Regional Policy Objectives (RPO 10.19 - RPO 10.24) of the RSES would help ensure consistency across the region. Unless this is achieved, a windfarm development on one side of a county boundary may not have scale to compete in future Renewable Electricity Support Scheme auctions and therefore may never get built – thereby reducing opportunity for both counties for job creation, commercial rates and community benefit schemes associated with the windfarm development.

2.2.2 Solar

Photovoltaic (PV) systems which produce electricity directly from solar radiation are becoming more widespread as their advantages become apparent and as costs fall. Given County Longford is well endowed by vast tracts of cutaway peatland the county is well placed to exploit the benefits of the sun through the installation of large solar farms.

Solar projects will play a critical role in diversifying our renewable generation portfolio for the period out to 2030. Ireland is in a great position to take advantage of the significant reduction in the cost of solar energy over the past few years as the technology has advanced with the potential to provide a clean, diversified renewable electricity source for decades to come. Solar energy is suited to Ireland's climate and we expect to follow the trend of other European countries and see increasing deployment of rooftop and grid scale solar energy. There is a strong correlation between wind and changing weather systems. In times of low wind there are often good solar conditions.

As highlighted in Section 5.8.2 of the Draft CDP, commercially operated solar farms, comprising of ground mounted PV installations have emerged in recent years. In this regard, we welcome CPO 5.143 and the support for associated transmission & distribution infrastructure.

“Encourage the development of solar energy in suitable locations in an environmentally sustainable manner and in accordance with Government policy and any forthcoming Renewable Energy Strategy for County Longford.”

Section DMS 16.181 in the Development Management Standards of the Draft CDP highlights, in the absence of national guidance, the criteria that should be considered when preparing an application for renewable energy projects, including solar farms.

ESB wish to highlight that currently Solar PV developments can take in excess of 5 years to develop to construction phase. Securing a grid connection, relevant support tariff or corporate power purchase agreement and securing project finance has introduced significant delays for developers. Therefore, notwithstanding the provisions of Section 42 of the Planning & Development Act 2000 (as amended), the Planning Authority should retain the option to grant permission for a longer period, than the standard 5 years, if requested by the developer, in appropriate circumstances.

In addition, it should be noted that the lifetime of solar developments is extending with most technologies now suitable for a minimum of 30 years operation. Investment decisions for projects



are being made on project lifetimes of up to 40 years. In this regard, ESB request that permissions are granted with a lifetime up to a maximum of 40 years. Concerns regarding the deterioration of the infrastructure can be addressed by the lodgement of a financial security in the form of a bond and the requirement to provide a Decommissioning Plan, as specified. This will ensure that the development is maintained until decommissioned and appropriately restored to agricultural use.

2.2.3 Energy Storage

Storage systems such as battery storage, liquid air storage and synchronous condensers are some of the storage technologies being explored that will be essential to smoothing out the natural variability that occurs in renewable energy sources and to provide electricity at times of peak demand.

CPO 5.133 as laid out in Section 5.8 of the Draft CDP, supports the development of energy storage technologies in the County.

“Support and facilitate the development of secure, appropriately-scaled energy storage facilities at suitable locations throughout the county”.

ESB wish to highlight, that Green Hydrogen, which is produced from renewable energy sources, offers potential for large scale seasonal storage of variable renewable energy. This enables zero carbon backup to the power system when intermittent renewables such as wind and solar are not available. Large scale Green Hydrogen production and storage could leverage the continental scale of Ireland’s renewable energy potential to enhance Ireland’s energy security and to make Ireland a net exporter of energy.

In addition to the Objective included in Section 5.8, we would welcome the inclusion of specific policies supporting these new technologies.

2.2.4 Hybrid Renewables

Hybrid sites and hybrid units present an opportunity to provide more flexible plant with improved capacity factors with potential for optimising use of existing infrastructure. To this end, Eirgrid already allows an increase in the installed capacity of existing connections without increasing the Maximum Export Capacity (MEC). By developing hybrid renewables plant consisting of wind, solar and battery exporting from common point of connection, but at different times, the need for transmission infrastructure associated with new generation is minimised and grid stability can be improved on.

Additionally, repowering with hybrid renewables can grant a new lease of life to existing windfarms and other generation sites. As recognised in the Draft CDP, County Longford is exceptionally well served by the grid with existing 110kV transmission lines providing a high capacity path for power to the midlands of Ireland. For these reasons, there is a strong argument for giving hybrid renewables plant favourable consideration in suitable locations in County Longford.

2.3 Regeneration of Brownfield Sites

ESB are committed to an orderly closure of the Lough Ree Plant and support the view that there is significant potential to develop a Green Energy Hub on these lands due to its extensive area of peatlands and its long history of power generation. Brownfield sites, particularly those relating to industrial or employment generating development offer significant opportunities to efficiently and sustainably contribute to the county’s stock of available economic assets. Brownfield lands will have supported employment use in the past and already have in place a range of services, hard standings



and access that could support new energy uses, industry, infrastructure and other job-creating activities into the future. Locating industrial and infrastructural development on brownfield sites make better use of existing infrastructure, services and transport links, prevents sprawl and preserves productive or environmentally significant greenfield land.

ESB supports the view that the given its substantial policy and financial support, both nationally and at EU level, 'Just Transition' offers a significant opportunity for economic and social change in the midlands. In addition to the financial support provided by ESB, we acknowledge the objectives set out in Chapter 8 - *Economic Development*, of the Draft CDP, seeking engagement from all stakeholders in relation to supporting alternative sustainable development at Lough Ree and the associated peatlands including;

CPO 8.84

"Engage with all relevant government stakeholders, sectoral representatives, ESB and Bord na Móna in developing and supporting sustainable alternative economic development, guided by the principles of 'Just Transition', for those employees and communities affected by the closure of the ESB Lough Ree Power Station and associated Bord na Móna peat harvesting practices."

CPO 8.85

"Identify, in collaboration with all relevant government stakeholders, sectoral representatives, ESB and Bord na Móna, potential uses for the ESB Lough Ree Power Station site as part of an overall regeneration programme for the site underpinned by the principles of 'Just Transition'."

CPO 8.86

"Support the use of the former Lough Ree Power Station site in Lanesborough for energy generation and transmission, tourism, industrial, commercial or other suitable alternative use, subject to other planning considerations and the proper planning and sustainable development of the area"

2.4 Telecommunications

A high quality and competitive telecommunications service is considered essential in order to promote industrial and commercial development and to improve personal security, enhance social inclusion and mobility. This view is reinforced in the Draft CDP, in Chapter 5, where it highlights, under section 5.9.1 that;

"Fast, reliable and cost-effective telecommunications can encourage economic development in an area and can enhance quality of life in a number of areas by offering new choices in education, entertainment and communications."

Draft Development Plan Policy Objectives CPO 5.156 – CPO 5.160 set out the requirements for a proposal for planning permission for telecoms infrastructure. ESB supports the continuance of these Objectives and the view of Longford County Council to facilitate the provision of telecommunications services at appropriate locations within the County;

"Promote orderly development of telecommunications infrastructure throughout the County in accordance with the requirements of the following; Telecommunications Antennae and Support Structures, Guidelines for Planning Authorities, DECLG, 1996, except where they conflict with Circular Letter PI07/12 which shall take precedence, and any subsequent guidelines 'Guidance on the potential location of over ground telecommunications infrastructure on public roads', (Dept of Communications, Energy & Natural Resources, 2015)."

ESB's telecoms infrastructure in the county continues to assist in delivering enhanced communications networks through the provision of backhaul fibre and shared telecommunications towers. The updated Guidelines and the development management standards set out in Section DMS 16.183 facilitate the improved development of telecommunications infrastructure and promotion of a policy of co-location. All ESB Telecoms Mast sites are open for co-location and duplication of infrastructure is reduced as a result. ESB supports the Telecommunications policy that promotes co-location.

ESB encourages policies consistent with the Department Circular to allow for the improved development of telecommunications infrastructure, particularly broadband capability in the area.

2.5 Sustainable Transport & Electric Vehicles

With Ireland's natural advantages in terms of wind and other renewables a large proportion of the power used by electric cars will be carbon free in the future. The Irish Government's Climate Action Plan 2019 has set stretching targets for EV adoption in Ireland in order to address energy demand and reduce emissions from Transport including achieving:

- 840,000 passenger vehicles by 2030.
- 95,000 electric vans and trucks by 2030.
- Procuring 1,200 low-emissions buses for public transport in cities.
- Building the EV charging network to support the growth of EVs at the rate required and develop our fast-charging infrastructure to stay ahead of demand.

The above targets demonstrate that EV's (incl. plug-in hybrid electric vehicles PHEV's) are central to Government targets for zero carbon emissions transportation systems. The establishment of EV infrastructure by ESB and the associated EV usage aligns with the key principles and benefits of sustainability and the National Climate Change Strategy on reduction of emissions.

ESB welcome the support for Electric Vehicles as set out in Section 5.2.6 of the Draft CDP – *Electric Vehicles*, where it states;

"The Council will seek to promote the use of EVs and the development of associated infrastructure, such as public charging points and in respect of car parking provisions."

This is reinforced in Section 5.2.4 *Parking*, and through a comprehensive set of Policy Objectives, that include, CPO 5.34 to CPO 5.38 and CPO 5.52 to CPO 5.54. The Climate Actions for the Transport Section also underpin this support for EV infrastructure by outlining a range of locations and standards for the provision of charge points.

ESB are of the view that the above objectives and standards will ensure that policy in this area is consistent with National and Regional Policy in relation to the provision of electric vehicle infrastructure. The above standards or similar have been implemented in the latest review of development plans by planning authorities in Ireland. Promoting policies and objectives are facilitating growth in charge point infrastructure, to become a comprehensive network of public and domestic charge points with open systems and platforms accessible to all supply companies and all types of electric cars.



As the use of electric vehicles continues to increase the Council may increase the number of parking spaces to be equipped with fully functional charge points in either of the above cases.

2.5.1 Other Sustainable Transport

Green renewable hydrogen enables the further electrification of transport, allowing the full decarbonisation of the transport sector, as well as improved air quality as the technology replaces diesel buses and diesel HGV across Ireland. ESB is currently part of a new, in-service, trial of a fuel cell electric bus in the Dublin area. These buses are powered by hydrogen produced from renewable electricity from ESB's Ardnacrusha hydro-electric power station. ESB has been actively engaging with Hydrogen Mobility Ireland, a partnership of businesses from across many sectors, together with public sector and academic stakeholders, with all-Island cooperation, joining together to deliver a coordinated approach to the introduction of this cutting-edge technology. This will ensure that Ireland can benefit from being an early starter in this solution to further decarbonise transport using renewable energy.

3. CONCLUSION

Investment in infrastructure is crucial to the economic and social well-being of our country. Such investment creates jobs, stimulates economic activity and provides modern, efficient facilities to provide the services that people need including healthcare, education and community services amongst others. There is a significant multiplier effect from investment in infrastructure which means that it stimulates growth in the local economy. This investment in infrastructure is also necessary to support EU and national policy on Climate Change adaptation and mitigation.

ESB, Ireland's leading electricity utility, is building a truly sustainable company by investing in smart networks, renewable energy and modernising the generation portfolio. Sustainability, both within the company and in the services we provide, is integral to our corporate strategy. We are committed to reducing carbon emissions and addressing long-term concerns over future fuel supplies. ESB is implementing energy strategies that support the transition of Ireland to a low-carbon and ultimately post-carbon economy to become a competitive, resilient and sustainable region. We request that due consideration is given to the issues raised in this submission, most particularly, that the final County Development Plan includes clear policies in relation to:

- Ensuring that the long-term operational requirements of existing utilities are protected. The importance of existing infrastructure and the associated Power Generation, Transmission and Distribution operations are strategic and national in nature.
- ESB is concerned that policies that are too restrictive may prevent the development of the optimum design for energy networks infrastructure where all the technical, environmental and economic factors are fully considered. Restrictive policies, such as CPO 5.123, which outline the preferred option in advance of the required analysis and planning process are not consistent with the policies and objectives of the Government which require *"that these investment programmes are delivered in the most cost efficient and timely way possible, on the basis of the best available knowledge and informed engagement on the impacts and the costs of different engineering solutions."*
- The final Plan should maintain the planning policies which protect the county's future capacity for the development of energy infrastructure whilst encouraging the sustainable development of renewable energy resources, including energy storage systems. This will enable ESB to develop and maintain *a safe, secure, reliable, economical and efficient electricity Generation, Transmission and Distribution System with a view to ensuring that all reasonable demands for electricity are met having due regard for the environment.*



- For the development of wind projects, the recently published Draft Revised Wind Energy Development Guidelines (2019) should inform the planning authority policy.
- It is appropriate that permissions for Solar PV are granted with a lifetime up to a maximum of 40 years which reflects the operational life and financial modelling for current solar technologies. Concerns regarding the deterioration of the infrastructure can be addressed by the lodgement of a financial security in the form of a bond and the requirement to provide a Decommissioning Plan, as specified. This will ensure that the development is maintained until decommissioned and appropriately restored to agricultural use.
- ESB are committed to an orderly closure of the Lough Ree Power Plant and support the view that there is significant potential to develop a Green Energy Hub on the lands due to its extensive area of peatlands and its long history of power generation. Brownfield sites, particularly those relating to industrial or employment generating development offer significant opportunities to efficiently and sustainably contribute to the county's stock of available economic assets.
- Facilitating expansion and improvement in telecommunications infrastructure and to help position the county to attract intellectual & physical capital and to act as a mechanism to improve virtual connectivity.
- Promoting, encouraging and facilitating the use of sustainable modes and patterns of transport, including electric vehicles, with appropriate Parking Standards that will set minimum levels of parking provision for EVs.

If we can be of any further assistance, or if you wish to clarify any of the points raised, please do not hesitate in contacting the undersigned.

Yours sincerely,

Gerard Crowley

Gerard Crowley | Planning and Asset Manager | Group Property and Security, 42 Merrion Sq., Dublin 2.
| T: +353 1 702 7163 / +353 87 237 4107 | www.esb.ie

