

Administrative Officer,
Draft County Development Plan,
Forward Planning Unit,
Longford County Council,
Áras An Chontae,
Great Water Street,
Longford,
N39 NH56.

10th August 2021

Re: Material Alterations to the Draft Longford County Development Plan 2021-2027

Dear Sir/Madam,

This submission by Electricity Supply Board, 27 Lower Fitzwilliam Street, Dublin 2, is in response to an invitation by Longford County Council for submissions to the Longford Draft County Development Plan 2021–2027 Proposed Material Alterations.

While this submission is confined to the Proposed Material Alterations, its content is in the context of our earlier submission to the Longford County Development Plan 2021-2027. ESB welcome the proposed amendments that aim to reinforce climate change policies and we wish to highlight opportunities to further strengthen the final plan as a result of advancements in renewable technologies.

Proposed Material Alterations

Section 5.7 – Energy Networks Infrastructure

Proposed Amendment CH 5.30 & CH 5.31

Both the NPF and the RSES contain promoting policies in relation to Energy Infrastructure. ESB fully supports the reinforcement of those policies at a local level which will accommodate the ongoing generation, transmission and distribution of electricity. It is recognised that the development of a secure and reliable transmission network, will ensure 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. Therefore, we welcome the insertion of the new Policy Objective before CPO 5.123 that provides clarity in this regard.

“Support the development, reinforcement, renewal and expansion of the electricity transmission and distribution grid, including the development of new lines, pylons and substations as required to provide for the future physical and economic development of County Longford.”

We note the amendment to the wording of Policy Objective CPO 5.123 that highlights that the objective relates to the undergrounding of local energy services where appropriate and that it relates to developments only.

ESB wish to highlight, that 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, Planning Acts and Planning Guidelines provides the necessary assurance 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.*

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 EirGrid and ESB Networks and Bord Gáis are obligated to adhere to all relevant guidelines and standards and they act in the national interest, and on behalf of all electricity consumers.*

Section 5.8 & 16.4.17 - Renewable Energy

Proposed Amendment CH 5.33 & CH 16.14

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 in the Climate Action Plan with no generation from peat and coal. 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. In this regard, we welcome the amendments to the text in the above sections of the Draft Plan and the acknowledgement from the Council that it has an important role to play in realising national targets through the inclusion of supporting policy objectives for renewable energy. We support the amendment that specifically states that a Wind Energy Strategy will form part of the Renewable Energy Strategy that will be prepared over the lifetime of the Draft Plan.

Section 5.8.1 – Wind Energy

Proposed Amendment CH 5.36 & CH 5.38

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.

In this regard, we welcome the alteration text in section 5.8.1 to Policy Objective CPO 5.139 that will ensure that proposals for wind energy developments will be considered having regard to the Draft Wind Energy Development Guidelines (2019).

Section 5.8 – Wind Energy

Proposed Amendment CH 5.35 & CH 16.15

Repowering can grant a new lease of life to existing renewable energy projects. This entails extending the planning lifetime of existing windfarm or solar farm with no or minimal new development. Well-maintained renewable energy projects and associated plant can operate safely after a planning expiry date of 20-30 years. Existing developments have the benefit of acceptance by local communities and contribute economically to the County through the payment of rates and community benefit funds. Therefore, we support the insertion of a new policy Objective after CPO 5.134 and the updating of DMS 16.182.

“The Council shall give consideration to extending the length of the Planning Permission and the life of renewable energy projects on a case-by-case basis given the nature of the proposed development and the type of renewable energy project.”

ESB supports the promotion of energy infrastructure objectives and submit that they must continue to protect the County's future capacity for the development of energy generating, processing, transmission and transportation infrastructure whilst encouraging the sustainable development of the County's renewable energy resources.

Section 16.4.9 – Car Parking – Table 16.1

Proposed Amendment CH 16.9

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 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 wish to highlight that, the EU Energy Performance of Buildings Directive comes into force soon. The new Directive calls for an **increase to 20%** for the number of parking spaces which should have provision for electric vehicle charging infrastructure. ESB welcome the broad support for EV infrastructure across the Draft Plan, however, in preparing the final County Development Plan, an opportunity exists to ensure availability is expanded. Under Table 16.1, DMS 16.132 can be updated in line with the new directive so that the County is consistent with National and Regional Policy in relation to the provision of electric vehicle infrastructure over the lifetime of the new plan. Therefore, to ensure that the Longford County Plan increases the usage of electric vehicles to the levels required, the standards outlined in DMS 16.132 should be updated to 20%. The implementation of the 20% standard will facilitate growth in charge point infrastructure, to ensure it becomes 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.

Conclusion

ESB, Ireland's leading electricity utility, is building a truly sustainable company by investing in smart networks, renewable energy and modernising the generation portfolio. 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.

- 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.
- We support the amendment that specifically states that a Wind Energy Strategy will form part of the Renewable Energy Strategy that will be prepared over the lifetime of the Draft Plan.
- Repowering can grant a new lease of life to existing renewable energy projects This entails extending the planning lifetime of existing projects with no or minimal new development. We welcome, the insertion of a Policy Objective to support the repowering/life extension of renewable energy developments.
- The insertion of the new Policy Objective before CPO 5.123 to support the development, reinforcement, renewal and expansion of the electricity transmission and distribution grid is welcomed as proposed. However, amendments proposed relating to undergrounding networks are



Energy for
generations

not appropriate. The optimum engineering solution, including underground and taking account of all factors should be determined on a project-by-project basis. 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 is obligated to adhere to all relevant guidelines and standards and it acts in the national interest, and on behalf of all electricity consumers.

- The EU Energy Performance of Buildings Directive comes into force soon. Recently, new regulations (ref: S.I. No. 393/2021 - European Union (Energy Performance of Buildings) Regulations 2021) require the implementation of appropriate infrastructure, to enable the installation at a later stage of recharging points for Electric Vehicles, for new buildings and existing buildings undergoing major renovation, with more than ten car parking spaces. They also require the installation of a minimum number of recharging points for all non-residential buildings with more than twenty car parking spaces by 1st January 2025. With this review of the Draft Plan, an opportunity exists to ensure that the new County Development Plan can be updated and consistent with electric vehicle infrastructure standards over the lifetime of the new plan.

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,

A handwritten signature in blue ink that reads "Gerard Crowley".

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