



Energy for  
generations

ESB Group Property

# Offaly County Council Draft Development Plan 2021-2027

Submission on behalf of ESB to the Offaly Draft County Development Plan  
07/10/2020



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## 1. INTRODUCTION

Electricity Supply Board (ESB) welcomes this opportunity to make a submission to the Offaly Draft County Development Plan 2017 – 2027. ESB is a landowner and employer in Offaly 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.

As set out in the Draft Development Plan, Offaly has a long history of energy production, related predominately to the commercial exploitation of peatlands. However, national environmental policies are dictating the withdrawal from traditional fossil fuel powered stations and a diversification of energy production towards green energy such as wind, solar and bioenergy. In this context and in recognition of the potential economic benefit of a transition to green energy production and the promotion of the green enterprise sector, ESB broadly support the overall vision of the Draft Development Plan. Outlined below are observations with regard to policies and objectives that should be taken into consideration in the preparation of the final plan.

### 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 National Planning Framework (NPF) and Regional Spatial & Economic Strategy (RSES) for the Eastern & Midlands Region.

### 1.2 Generation, Transmission & Distribution of Electricity

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 Offaly 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**

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 Irelands National and Motorway routes.

### **1.4 ESB Telecommunications Infrastructure**

ESB Telecoms has grown from its original function of providing a communications system for ESB to become Ireland's leading independent telecommunications infrastructure provider 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.

In addition, a joint venture between ESB and Vodafone called SIRO - 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 2020.

## **2. PLANNING POLICY & DRAFT CDP**

In reviewing the draft plan, ESB is supportive of policies that will set the framework for the future development of the County. We acknowledge that the process of preparing the new County Development Plan was informed by the National hierarchy of spatial plans. Both the National Planning Framework (NPF) and the Regional Spatial Economic Strategy (RSES) contain policies in relation to Energy Infrastructure.

In the context of a transition to a low carbon and climate resilient County, ESB support the aim to provide for the development of indigenous energy resources, with an emphasis on renewable energy supplies. The policy and objectives of the County in relation to Climate Action and Energy are set out in Chapter 3 of the written statement. In addition, the draft Wind Energy Strategy and Chapter 13 Development Management Standards, contain the draft development management standards that will be applied by the Council to ensure sustainable development of energy related infrastructure.

### **2.1 Transmission, Distribution & Generation**

ESB supports the National Planning Framework in the context that Regional Planning Guidelines, Local Development Plans and the Strategic Infrastructure Act provides a robust framework for ensuring that all necessary standards are met, and that extensive statutory and non-statutory consultation continues to be an intrinsic part of the planning process for the development of electricity

infrastructure. This ensures that there is ongoing consultation with local communities and local authorities regarding the construction of renewable generation and new networks.

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, 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.

### 2.1.1 Transmission & Distribution

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 that will accommodate the ongoing generation, transmission and distribution of electricity. 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. ESB is investing in programmes aimed at ensuring a secure supply of electricity using increasing amounts of intermittent and variable renewable generation. We are also investing heavily in the transmission and distribution systems to provide the infrastructure and operational requirements needed to facilitate an even greater reliance on renewable electricity.

The new County Development Plan 2021 – 2027 must continue to ensure that the long-term operational requirements of existing utilities are protected. In this regard, ESB support draft Policy CAEP-01 in Chapter 3 of the Draft Development Plan, where it states;

*"It is council policy to 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 Offaly."*

### 2.1.2 Generation - Renewables & Energy Storage

The draft plan recognises that transitioning to a low carbon economy, future diversification and adaptation to new energy sources is vital and that new energy systems and transmission grids will be necessary for a more distributed, renewables-focused energy generation system.

In Chapter 3.1.6 of the draft plan, it is acknowledged that traditional fossil fuelled energy sources are being phased out as we move towards a diversification of green energy production such as wind, solar and bioenergy.

In this regard, ESB support policies CAEP-07 & CEAP-08 which state;

#### **CEAP-07**

*"It is Council policy to support, local, regional, national and international initiatives for climate adaptation and mitigation and to limit emissions of greenhouse gases through energy efficiency and the development of renewable energy sources which make use of all-natural resources, including publicly owned lands, in an environmentally acceptable manner."*

#### **CEAP-08**

*"It is Council policy to support the transition to a competitive, low carbon, climate resilient and environmentally sustainable economy by 2050, by way of reducing greenhouse gases, increasing renewable energy, and improving energy efficiency."*

ESB continues to invest in programmes aimed at ensuring a secure supply of electricity using increasing amounts of intermittent and variable renewable generation. We are also investing heavily in the transmission and distribution systems to provide the infrastructure and operational requirements needed to facilitate an even greater reliance on renewable electricity. 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.

In this regard we support the inclusion of policy CAEP-03 which promotes the use of efficient energy storage systems, stating;

*“It is Council policy to promote the use of efficient energy storage systems and infrastructure that supports energy efficiency and reusable energy system optimization, in accordance with proper planning and sustainable development.”*

### 2.1.3 Solar

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 expected to follow the trend of other European countries and see increasing deployment of rooftop and grid scale solar energy. Solar enhance the range of weather conditions that will deliver renewable power. There is a strong correlation between wind and changing weather systems. In times of low wind there are often good solar conditions.

Due to the tradition of energy production in the midlands, Offaly is well placed to exploit the benefits of the sun through the installation of large solar farms. As highlighted in the plan, accessibility and proximity to existing electricity networks is a distinct advantage as it is not viable to locate solar farms over 1km from network infrastructure. We support policy CAEP-32 that seeks to ensure appropriate site selection for large solar farms;

*“site selection, by focusing in the first instance on developing solar farms on previously developed and non-agriculture land, provided that it is not of high environmental value.”*

In 2017 ESB announced a co-development agreement with Bord na Mona to develop solar energy projects in four locations in Offaly, Roscommon and Kildare. The joint venture, known as Sundew Solar, will access part of Bord na Móna's land bank in strategic locations across the Midlands that are suitable for large scale solar energy projects. The joint venture brings together the expertise of two leading commercial semi-state companies in significant renewable energy projects that will help deliver Ireland's energy transition policies.

### 2.1.4 Draft Wind Energy Policy & County Wind Energy Strategy

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.

Policy CAEP-34 in the draft plan highlights the recognition by Offaly County Council of the importance of wind energy by stating;

*"It is Council policy to recognise the importance of wind energy as a renewable energy source which can play a vital role in achieving national targets in relation to reductions in fossil fuel dependency and therefore greenhouse gas emissions."*

The County Wind Energy Strategy recognises that Offaly has an excellent electricity transmission network and in order to facilitate the expansion in electricity generation installation from wind farms and other sources, the grid in the midlands may itself need require development and expansion. ESB support the view set out on page 9 of the Strategy where it states;

*"It is therefore prudent for the future development of electricity and wind farms in County Offaly that these strategic pieces of infrastructure are protected from inappropriate development in their immediate environs and that their scope for development is maintained."*

ESB support the Wind Energy Development Policy set out in Section 8 of the County Wind Energy Strategy, including the policy of the Council to assess proposals for new wind energy developments in accordance with Map. No. 10 'Wind Energy Strategy Designations', Climate Action Energy Objective 03 and subject to the Development Management Standard 109 contained in Chapter 13 of the Written Statement along with Section 28 Wind Energy Development Guidelines or any update made thereto.

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 (DCCAE). The recently published Draft Revised Wind Energy Development Guidelines (2019) confirm the "preferred draft approach" which should inform the planning authority planning for wind energy development.

### 2.1.5 Brownfield Sites

ESB supports the view that there is significant potential to develop a Green Energy Hub in County Offaly due to its extensive area of peatlands, its long history of power generation and its proactive position in relation to renewable energy developments over the past decade. In addition, the view that these lands should be considered for future energy storage such as data centres and efficient energy storage is welcome. ESB wish to highlight that the technology in relation to energy storage is evolving. Technologies such as liquid air storage, that provide more scalable storage systems than batteries and synchronous condensers for additional grid support may form future developments in this area and would be suitably located on the site of former generation stations.

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 structures that could support new industry, infrastructure and other job-creating activities into the future.

In this regard, we support policy CAEP-13 that calls for the preparation of a comprehensive after use framework plan for the industrial peatlands and associated workshops, office buildings and industrial sites in the midlands.



## 2.2 Telecommunications

The provision of high-quality telecommunications infrastructure is recognised by Offaly County Council as critical to the development of a knowledge economy and will help attract inward investment in hi-tech, knowledge-based industries. 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.

ESB encourages policies consistent with the Department Circular PL/12 to allow for the improved development of telecommunications infrastructure as set out in policy ENTP-32 contained in Chapter 5, *Economic Development*. In addition, ESB support the development management standards set out under DMS-111 in Chapter 13 that provides the requirements for planning applications for telecommunications infrastructure.

## 2.3 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.
- Build 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.

The RSES for the Eastern & Midlands Regions contains the following Objective RPO. 7.42;

*"Local Authorities shall include proposals in statutory lands use plans to facilitate and encourage an increase in electric vehicle use, including measures for more recharging facilities and prioritisation of parking for EV's in central locations."*

In this regard we welcome Chapter 3.6 'Electric Vehicles, Fuel Cell Vehicles and Autonomous Vehicles' in the draft plan and associated supportive policy CAEP-48.

*"It is council policy to support the growth of Electric Vehicles, E-Bikes, Fuel Cell Vehicles and Autonomous Vehicles with support facilities, through a roll-out of additional electric charging points and refuelling infrastructure in collaboration with relevant agencies..."*

DMS-104 in Chapter 13, *Development Management Standards* also provides clear guidance for parking standards associated with electric charging points to allow for functional vehicle charging. These policies and standards support the roll-out of battery charging infrastructure at a range of locations and will facilitate growth in charge point infrastructure, to become a comprehensive network of public and domestic charge points.



### 3. CONCLUSION

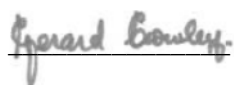
Investment in infrastructure is crucial to the economic and social well-being of our country. Such investment creates jobs, stimulates economic activity and provides modern, efficient facilities to provide the services that people need including healthcare, education and community services amongst others. There is a significant multiplier effect from investment in infrastructure which means that it stimulates growth in the local economy. It is also necessary to support EU and national policy on Climate Change adaptation and mitigation. Europe's emissions reduction commitment to the 2015 Paris Agreement and its long-term objective of a 2050 decarbonised economy means that both the European Union and its Member States (including Ireland) will be subject to increasingly constrained emissions limits.

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 Development Plan must ensure 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.
- The 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.*
- ESB welcomes policies which support the redevelopment and re-use of brownfield development sites the recognition of their potential as economic assets which can provide additional employment in the County.
- For the development of wind projects, ESB submit that development policies should be consistent with Government Guidelines and any updates thereto.
- ESB generally supports the policies & objectives set out in the draft plan which can facilitate an improvement in telecommunications infrastructure and help position the County to attract intellectual and physical capital.
- The final Development Plan should retain the Parking Standards that will set minimum levels of parking provision for EVs at a range of locations.

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 | 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](http://www.esb.ie)