



Energy for
generations

ESB Group Property

Issues Stage - Offaly County Development Plan 2021-2027

Submission on behalf of Electricity Supply Board to the Issues Paper.
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1. INTRODUCTION

Electricity Supply Board (ESB), 42 Merrion Square, Dublin 2, welcomes this opportunity to make a submission to the review of the existing Offaly County Development Plan 2014 – 2020 and the preparation of a new County Development Plan 2021 – 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, we extract further value from our assets through supplying gas, using our 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 Issues Paper, under the heading of '*Climate Action & Energy*'; it is a stated aim to achieve transition to a competitive, low carbon, climate resilient and environmentally sustainable economy by reducing our carbon dioxide emissions across the electricity generation, built environment and transport sectors. ESB fully supports policies which align with meeting Government targets for emissions reduction, energy efficiency and increased use of renewable energy.

Outlined below are a number of observations with regard to strategic issues that should be taken into consideration in the preparation of the draft Offaly County Development Plan 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-island 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.

Our goal is to reduce ESB's carbon emissions 40% by 2030, and towards becoming carbon-neutral by 2050. ESB aims to achieve this through expanding its wind & solar portfolio, and continually investing in other renewable energy technologies that take advantage of the natural resources available to us. By 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. ESB is embracing new technologies that are revolutionising the energy industry, including smarter electricity networks. We are investing in exciting energy solutions that harnesses the power of solar, wind, wave and storage to provide a cleaner future.

1.2 Generation

ESB has a rich legacy of electricity generation in the midlands and at one time owned and operated four peat powered stations in County Offaly. As a result, ESB remains a significant landowner in the County and owns and operates Transmission and Distribution infrastructure throughout Offaly.

The West Offaly Generating Station, at Shannonbridge is a milled peat generation station with an electrical output of 150MW. The station uses modern fluidised bed technology to burn peat (to produce steam for the turbine/generator) in an environmentally friendly and efficient manner. Due to higher efficiency the plant produces 30% more electricity for the same fuel input than the older plant which has been replaced. The power station was constructed as a replacement for the ageing 125MW Shannonbridge Power Station and has a contract to burn peat supplied by Bord na Mona. ESB is currently reviewing the recent decision to refuse permission to transition the station to a renewable biomass firing station.

1.3 Transmission and Distribution

ESB Networks builds, manages and maintains a transmission and distribution network of over 180,000 km across the Republic of Ireland. It is responsible for constructing all the sub-transmission, medium and low voltage electricity network infrastructure in the country and for managing this infrastructure which is owned by ESB. The focus on recent investment in the network was on continuing the reinforcement of the system to facilitate the connection of new renewable electricity generation. ESB Networks is unique in that all electricity users are in contact with ESB Networks and in 2018 over 26,900 new residential and business connections were completed.

1.4 ESB Telecoms & 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. ESB Telecoms now provides network solutions for the 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. Powered by Light, SIRO is the only network in Ireland that uses the existing electricity network to provide 100% fibre broadband directly to the home or business, enabling speeds of 1 Gigabit per second. SIRO will continue to accelerate this roll-out in 2019.

1.5 ESB roll-out of EV infrastructure

ESB, as the owner/operator of the electricity Distribution System, is responsible for providing the EV charging infrastructure in Ireland.

To date, ESB has rolled out a strong network of publicly accessible charge points, including fast chargers along all major inter urban routes. Currently, the charge point infrastructure is building 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.

The Irish Government has set stretching targets for EV adoption in Ireland in order to address energy demand and emissions from Transport. The Climate Action Plan 2019 sets out ambitious targets in relation to EV development, including a target of 840,000 passenger EV's on Irish roads by 2030.

2. PLANNING POLICY & PROPOSED DRAFT CDP

ESB welcomes the view set out in in the Climate Action & Energy section of the Issues Paper in relation to climate action;

“Climate action will continue to be driven by the need to limit global temperatures, improve energy efficiency, increase energy consumption from renewable sources, and reduce greenhouse gas emissions...There are a range of renewable energy technologies available such as wind turbines and solar farms all of which contribute to a reduction in non-renewable energy demand.”

Notwithstanding the above, ESB has a number of observations with regard to strategic issues, as set out below which should be taken into consideration in the preparation of the draft plan.

2.1 Areas with Antecedent Uses & Brownfield Lands

ESB would strongly welcome the retention of Policies and Objectives in Areas with Antecedent Uses and Brownfield Lands in the Draft Plan. Policy EntP – 07 and Objective Ento – 06 in the existing plan

give recognition in principle to the redevelopment and re-use of brownfield development sites within the county and their potential for additional employment in Offaly.

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, often in the recent past, and already have in place the range of services, hard standing and structures that could support new industry, infrastructure and other job-creating activities into the future.

2.2 Generation, Transmission & Distribution

ESB is investing in exciting energy solutions that harnesses the power of solar, wind, wave and storage to provide a cleaner future. In this regard, we welcome the continuation of specific Policy Objectives for renewable energy, renewable energy resource development and the associated strengthening and improvement of the transmission network.

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 that will accommodate the ongoing generation, transmission and distribution of electricity. The new County Development Plan 2021 – 2027 must continue to ensure that the long-term operational requirements of existing utilities are protected. The ongoing need for curtilage management and the restriction of lands uses, which might affect the ability to consolidate and/or expand operations, is essential.

In recognition of County Offaly's long history of energy production, we would welcome the continuance of Energy Policy EP – 08 which supports the ongoing generation of electricity in the county;

“Having regard to the county's long tradition in power generation, it is Council policy to facilitate the continuance of power generation stations within the county, as appropriate including the consideration of co-fuelling and in line with National Policy Guidelines.”

In addition, Offaly County Council's commitment to respond to government policy on renewable energy is outlined in sections 3.4 and 3.5 of the existing Plan and Wind Energy Strategy Document for County Offaly. The importance of renewables is recognised in the existing Plan under Objectives EP – 01 to EP – 05 as outlined in the following statements;

“It is Council policy to support national and international initiatives for limiting emissions of greenhouse gases and to encourage the development of renewable energy sources”.

“It is Council policy to encourage the development of wind energy in suitable locations, within the wind energy development areas.”

In an effort to further diversify energy sources and building on an established tradition of energy production in the midlands, ESB, in partnership with Bord na Móna aim to deliver a portfolio of solar farms up to 600MW in capacity on cutaway bogs in the Midlands. In this regard, ESB would welcome the inclusion of promoting policies in relation to the development of solar renewables in Co. Offaly. Similar to other renewable projects, these solar proposals are strategically located and geographically focused to maximise the use of existing grid infrastructure associated with traditional fossil fuel plants.

The history of peat stations has left a valuable legacy for Offaly in the existing transmission infrastructure that traverses the County. The existing plan recognises that the current distribution network can be used for the sustainable development of new generation capacity. 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.

2.3 Telecommunications

The provision of high-quality telecommunications infrastructure is recognised by Offaly County Council a prerequisite for a successful economy and important in removing the peripheral barrier that parts of the County experiences. ESB's collection of telecoms infrastructure in the county continues to assist in delivering enhanced communications networks through the provision of backhaul fibre and shared telecommunications towers.

ESB generally supports the Telecommunications policy that promotes a policy of co-location. All ESB Telecoms Mast sites are open for co-location and duplication of infrastructure is reduced as a result.

2.4 Transport & Electric Vehicles

The European Commission Proposal (January 2013) for a Directive of European Parliament and of the Council on the development of alternative fuels infrastructure proposes a minimum of 2200 publicly accessible EV charging points in Ireland by 2020. 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 establishment of EV infrastructure by ESB and the associated EV usage both nationally and internationally aligns with the key principles and benefits of sustainability and the National Climate Change Strategy on reduction of emissions. The Irish Governments has set stretching targets for EV adoption in Ireland in order to address energy demand and emissions from Transport. The Climate Action Plan 2019 sets out the following:

- Increasing the no. of passenger EVs on the road to 840,000 by 2030 from 500,000 in the NDP
- Reaching 95,000 electric vans and trucks by 2030, compared with 19,000 in the NDP
- 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 both nationally and internationally 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.”

Current Offaly Co. Co. policy STAP-02 supports the roll-out of battery charging infrastructure where considered appropriate. However, S.I. No. 325 of 2014 ROAD TRAFFIC (TRAFFIC AND PARKING) (CAR CLUBS AND ELECTRICALLY POWERED VEHICLES) REGULATIONS 2014 makes provision for EV parking in public areas. Therefore, in order to meet the targets of the Governments Electric Transport Programme, we respectfully submit that Offaly County Council should strengthen their support for the roll-out of EV infrastructure with the inclusion of following updated parking standards:

2.4.1 Proposed parking standards for Draft CDP

1. **For Developments with Private Car Spaces (residential and non-residential) including visitor car parking spaces e.g. office –spaces**

- a. *At least one parking space should be equipped with one fully functional EV charging point in accordance with IEC 61851 Standard for Electric Vehicle Conductive Charging Systems. This should be capable of supplying 32A 230V single phase AC electricity and be equipped with Mode 3 protection. It should be fitted with a Type 2 socket as defined by IEC 62196.*
- b. *It should be possible to expand the charging system at a future date (e.g. by installing appropriate ducting now) so that up to 10% of all spaces can be fitted with a similar charging point.*

2. For Developments with Publicly Accessible Spaces (e.g. supermarket car park, cinema etc.)

- a. *At least one parking space should be equipped with one fully functional EV charging point in accordance with IEC 61851 Standard for Electric Vehicle Conductive Charging Systems. This should be capable of supplying 32A 230V single phase AC electricity and be equipped with Mode 3 protection. It should be fitted with a Type 2 socket as defined by IEC 62196.*
- b. *It should be possible to expand the charging system at a future date (e.g. by installing appropriate ducting now) so that up to 10% of all spaces can be fitted with a similar charging point.*
- c. *The Charge Point Parking space(s) should be clearly marked as being designated for EV charging.*
- d. *Appropriate signage indicating the presence of a charge point or points should also be erected.*
- e. *All charge points fitted in publicly accessible areas should be capable of communicating usage data with the national charge point management system and use the latest version of the Open Charge Point Protocol (OCPP). They should also support a user identification system such as RFID.*

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.

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.

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 are 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 draft County Development Plan retains its clear policies in relation to:

- Backing the delivery and continuation of a secure and resilient supply of energy.
- Harnessing the potential of renewables in the Region, focus in particular on the extensive tracts of publicly owned peat extraction areas in order to enable a managed transition of the local economies of such areas in gaining the economic benefits of greener energy.
- The continuation of a clear policy of encouraging the redevelopment of brownfield sites in rural areas would assist in permitting employment generating development.
- ESB welcome planning policies and objectives which will facilitate an improvement in telecommunications infrastructure and help position the county to attract intellectual and physical capital.
- To promote, encourage and facilitate the use of sustainable modes and patterns of transport including electric vehicles.

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,



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