

Forward Planning Section,  
Offaly County Council,  
Áras an Chontae,  
Charleville Road,  
Tullamore,  
County Offaly

16<sup>th</sup> July 2021

## Re: Proposed Material Alterations to the Draft Offaly 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 Offaly County Council for submissions to the Offaly 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 Offaly County Development Plan 2021-2027. ESB welcome the proposed amendments that aim to reinforce climate change policies and wish to highlight opportunities to further strengthen the final plan, as a result of advancements in renewable technologies.

## Proposed Material Alterations

### ENERGY INFRASTRUCTURE

#### *Proposed Material Alteration MA60*

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. We support the addition of MA60 into the final plan as it further reinforces the importance of energy infrastructure as outlined in section 3.4 of the Draft Plan.

#### **MA60**

*It is Council policy to support the reinforcement and strengthening of the electricity transmission and distribution network to facilitate planned growth and transmission/distribution of a renewable energy focused generation across the major demand centres. This includes:*

- *Facilitating trans-boundary networks into and through the County and Region to ensure the Regional Spatial and Economic Strategy can be delivered in a sustainable and timely manner;*
- *Facilitate the delivery of the necessary integration of transmission network requirements to allow linkages of renewable energy proposals to the electricity transmission grid in a sustainable and timely manner; and*
- *Support the safeguarding of strategic energy corridors from encroachment by other developments that could compromise the delivery of energy networks.*

We welcome the promotion of energy infrastructure objectives that protect the County's future capacity for the development of energy generating, processing and transmission infrastructure that are necessary for the sustainable development of the County's renewable energy resources. In addition, we welcome that the ongoing need for curtilage management and the restriction of lands uses, which might affect the ability to consolidate and/or expand operations, is recognised through this alteration. The support for the facilitation of trans-boundary networks into and through the County is aligned with Regional Policy objections and the delivery of plans for regional development.

The provision of a secure and reliable electricity transmission infrastructure and transmission grid is essential to meet the growth in demand and ensure that a reliable electricity supply is available. Offaly has a very strong electrical grid and substation network and this network will be instrumental in supporting the development of the renewable energy industry in the county.

## WIND ENERGY

### Proposed Material Alterations MA65 & MA256

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.

Based on SEAI analysis, February 2020 provided a record-breaking month with 56% of electricity 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 proposed alteration MA65 that amends CAEP-35 and MA256 amending Development Management Standard 109. The proposal to remove the text that states; "*require a 2 km separation distance from turbines to town and village settlement boundaries in the county*" is supported in the context of the '*preferred draft approach*' as confirmed in the Draft Revised Wind Energy Development Guidelines (2019).

The "*preferred draft approach*" for visual amenity comprises a setback distance **of 4 times the tip height between a wind turbine and the nearest point of the curtilage of any residential property, subject to a mandatory minimum setback of 500 metres**. Setback requirements would also be subject to compliance with noise limits. Extensive setbacks, inconsistent with National Policy have the effect of seriously diminishing the land area potentially available for wind energy projects as a result of prevailing development patterns, with consequent implications for the non-attainment of binding national obligations in relation reducing emissions.

Therefore, ESB supports MA65 & MA256, as they amend policy to ensure planning applications for wind farms are assessed having regard to the latest National Guidelines.

## ECONOMIC DEVELOPMENT

### Proposed Material Alterations MA64 & MA125

ESB are committed to an orderly closure of the West Offaly Power Station (Shannonbridge). We acknowledge proposed Material Alteration MA64 and recognise that the closure of power stations and associated cessation of peat harvesting in some areas of the County has economic and social impacts. ESB support Offaly County Council initiatives to implement appropriate responses through application of the 'Just Transition' concept to assist the affected communities.

Due to its proximity to the electricity transmission and distribution network, the lands associated with the West Offaly Power Station have the potential to provide for a number of future uses, such as electricity peaking plant, a location for hybrid renewables or other compatible uses. In this regard we welcome the identification of hybrid renewables as strategic opportunity in Material Alteration MA125. Hybrid renewables consists of two or more renewable energy sources used together to provide increased system efficiency as well as greater balance in energy supply, whilst optimising use of existing infrastructure. 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.

ESB note, detailed proposed material alterations to section 5.5.6 'Green Energy' of the Draft Plan as set out in proposed alteration MA125. The strategic opportunities identified for Rhode Green Energy Park (GEP) under MA125, demonstrate the role former generation station lands with existing connections to transmission and distribution networks can play in the diversification of energy production toward green energy. This planned approach offers the potential for increased efficiencies through the co-location of related technologies that the opportunity to export renewable energy onto existing grid infrastructure to help the transition to a low-carbon and climate resilient economy.

## ELECTRIC VEHICLES

### Proposed Material Alteration MA68 & MA259

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.

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.

In line with ESB Strategy, we are also 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.

In this regard we welcome the proposed alterations MA68 & MA259 that reinforce support for EV's along with the development of alternative methods to fuel the transport sector. 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, diesel HGV and potentially some diesel trains across Ireland.

In relation to proposed amendments to the Development Management Standards and in the context of the above supporting objectives in relation to sustainable transportation, 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.

In this regard, in the preparation of the final County Development Plan, an opportunity exists to ensure availability is expanded, 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 Development Standard Objective DMS-104 as set out in Chapter 13 and also in proposed Appendix 1 *Transport Modal Shift* align with the new Directive, ESB propose that the Objective be amended as follows.

**DMS-104**

*“A minimum of ~~40%~~ 20% of the proposed car parking spaces required for the category of development listed in car parking standards contained in DMO-102 shall be provided with electrical connection points, to allow for functional electric vehicle charging. The remaining car parking spaces shall be fitted with ducting for electrical connection points to allow for the future fit out of charging points.*

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.

## 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.
- For the development of wind projects, ESB support development policies that are consistent with Government Guidelines and the “preferred approach” as outlined by Government Departments, DHPCLG and DCCAE, in June 2017 and recently published Draft Guidelines. In this regard we support Material Alterations MA65 & MA256.
- ESB is committed to an orderly closure of West Offaly Power Plant and support the view that there is significant potential to develop renewables due to the existing electricity networks, extensive area of peatlands and the long history of power generation.
- 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. By updating DMS-104, an opportunity exists to ensure that the new County Development Plan will be consistent with National and Regional Policy in relation to the provision of electric vehicle infrastructure 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,



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